

**BEFORE THE PUBLIC SERVICE
COMMISSION OF THE STATE OF
MISSOURI**

In the Matter of Kansas City Power & Light Company’s)
Request for Authority to Implement A General) Case No. ER-2016-0285
Rate Increase for Electric Service)

**KANSAS CITY POWER & LIGHT COMPANY’S
REPLY TO PUBLIC COUNSEL’S RESPONSE
AND PARTIAL OBJECTION TO KCPL
EXHIBIT 169 AND 169 HC**

COMES NOW Kansas City Power & Light Company (the “Company”) and hereby files its reply to the Public Counsel’s Response And Partial Objection To KCPL Exhibit 169 and 169 HC (“Partial Objection”) filed on March 17, 2017, and in support states as follows:

1. At the evidentiary hearings held in this docket before the Missouri Public Service Commission (“Commission”) on February 23, 2017, Chairman Daniel Hall (“Chairman Hall”) requested additional information regarding the cost breakdown in regard to Electric Vehicle (“EV”) charging stations versus the distribution infrastructure related to them.

2. On March 7, 2017, the Company filed its Motion To Late-File Exhibit 169 with an attached Exhibit 169 (HC) which contains the information requested by Chairman Hall.

3. On March 17, 2017, Public Counsel filed its Partial Objection which “does not object to the portions of Exhibit 169 relating to the numbers of the charging stations, the table containing the values for each of KCPL’s categories, the assertion of the value associated with distribution, or the depreciation rate applied.” However, the Public Counsel objected to some explanatory information in the exhibit which the Company believes is necessary to fully understand the numbers related to the cost of the EV charging stations. (Partial Objection p.

2) For reasons stated herein, the Public Counsel’s Partial Objection should be denied.

4. The portion of the exhibit to which Public Counsel objected contains explanatory information regarding the Service Provider Plan under which KCP&L purchased the EV charging stations at issue in this case. It explains the additional capabilities and features of the EV charging equipment purchased under the Service Provider Plan which are enhancements (and therefore add to the cost of the EV charging stations) above the features that could be purchased under the Commercial Plan. These features (i.e., peak load monitoring, energy and demand management, and real-time power output control) are not available under the less expensive Commercial Plan. These enhancements explain the reasons the cost of the Service Provider Plan is above the Commercial Plan and the reasons it provides substantial benefits to the Company which would not necessarily be of interest to non-utility third-party providers.

WHEREFORE, Kansas City Power & Light Company respectfully requests that the Commission deny Public Counsel's Partial Objection and instead admit Exhibit 169 into the record of this case.

Respectfully submitted,

/s/ Roger W. Steiner

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**ATTORNEYS FOR KANSAS CITY
POWER & LIGHT COMPANY**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, to all counsel of record in this case on this 22nd day of March, 2017.

/s/ Roger W. Steiner

Roger W. Steiner