

**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) File No. ER-2014-0370
A General Rate Increase for Electric Service)

**KANSAS CITY POWER & LIGHT COMPANY'S REPLY
TO (1) PUBLIC COUNSEL'S RESPONSE TO ORDER DIRECTING FILING
REGARDING REVENUE REQUIREMENT ESTIMATE; AND
(2) MECG RESPONSE TO ORDER DIRECTING FILING REGARDING REVENUE
REQUIREMENT ESTIMATE**

COMES NOW Kansas City Power & Light Company ("Company" or KCP&L") and hereby submits to the Missouri Public Service Commission ("Commission") its Reply to (1) Public Counsel's Response to Order Directing Filing Regarding Revenue Requirement Estimate; AND (2) MECG Response to Order Directing Filing Regarding Revenue Requirement Estimate.

Reply to OPC

1. On August 21, 2015, Public Counsel ("OPC") filed its Response to Order Directing Filing Regarding Revenue Requirement Estimate ("OPC's August 21 Filing"). The Commission should disregard paragraphs 2 and 3 of OPC's August 21 Filing because those paragraphs (a) do not comply with the request made by the Commission in its August 19, 2015, Order Directing Filing Regarding Revenue Requirement Estimate ("August 19 Order"); (b) add new arguments that could and should have been raised during the testimony and hearing phases of the case; and (c) are wholly unsupported by any record evidence.

2. In its August 19 Order, the Commission stated "[A]t their agenda meeting on August 19, 2015, the Commissioners requested additional information from Staff to provide an estimated total revenue requirement based on hypothetical rulings on disputed issues in the case. The Commission will direct Staff to prepare and file such an estimate assuming the Commission were to issue a report and order with the following hypothetical rulings: . . .". (August 19 Order,

p. 1) The Commission went on in the order, stating that “[A]ny other party wishing to respond to the above request shall do so no later than August 21, 2015.” While paragraphs 1 and 4 of OPC’s August 21 Filing are responsive to the request made by the Commission in its August 19 Order, paragraphs 2 and 3 of OPC’s August 21 Filing go well beyond that Commission Request by adding new arguments that are unsupported by any record evidence.

3. The rate case expense alternative based on the ratio of revenue requirement awarded to revenue requirement requested, while not a position supported by OPC or the Company, was proposed as an alternative in the rebuttal testimony of Staff witness Oligschlaeger. See Ex. 236 at 10-11. To the extent OPC disagreed with that alternative, OPC should have challenged it by way of cross-examination or discussed it in the briefs, the last of which were filed on August 3. OPC chose not to contest this Staff testimony in accordance with the procedural schedule and it is inappropriate for OPC to offer new arguments now.

4. Moreover, the arguments in paragraphs 2 and 3 of OPC’s August 21 Filing are utterly devoid of any citation to record evidence, and should be disregarded by the Commission for that reason as well.

Reply to MECG

5. On August 21, 2015, the Midwest Energy Consumers Group (“MECG”) filed its Response to Order Directing Filing Regarding Revenue Requirement Estimate (“MECG’s August 21 Filing”). The Commission should disregard the entirety of MECG’s August 21 Filing because it (a) does not comply with the request made by the Commission in its August 19, 2015, Order Directing Filing Regarding Revenue Requirement Estimate (“August 19 Order”); (b) adds new arguments that could and should have been raised during the testimony and hearing phases of the case; and (c) is essentially another round of briefing by MECG that is clearly beyond the

procedural schedule and is wholly unsupported by any record evidence.

6. In its August 19 Order, the Commission stated “[A]t their agenda meeting on August 19, 2015, the Commissioners requested additional information from Staff to provide an estimated total revenue requirement based on hypothetical rulings on disputed issues in the case. The Commission will direct Staff to prepare and file such an estimate assuming the Commission were to issue a report and order with the following hypothetical rulings: . . .”. (August 19 Order, p. 1) The Commission went on the order that “[A]ny other party wishing to respond to the above request shall do so no later than August 21, 2015.” The entirety of MECG’s August 21 Filing goes well beyond that Commission Request by re-arguing matters, adding new arguments and utterly failing to provide any citations to record evidence. It is clear that MECG does not address the information specifically requested by the Commission.

WHEREFORE, KCP&L respectfully submits this Reply and asks that the Commission disregard paragraphs 2 and 3 of OPC’s August 21 Filing and the entirety of MECG’s August 21 Filing.

Respectfully submitted,

/s/ Robert J. Hack

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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, this 28th day of August, 2015, to all parties of record.

/s/ Robert J. Hack _____

Robert J. Hack