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

KANSAS CITY POWER & LIGHT COMPANY'S MOTION TO APPROVE RECONCILIATION

COMES NOW Kansas City Power & Light Company ("KCP&L" or the "Company"), by and through counsel and, pursuant to Section 386.420.4, RSMo. (Cum. Supp. 2011), hereby files this Motion to Approve Reconciliation. In support thereof, the Company states as follows:

- 1. On September 2, 2015, the Commission issued its Report and Order in this proceeding authorizing KCP&L to increase rates to permit it to collect an additional amount of approximately \$89.7 million from its Missouri electric customers.
- 2. Pursuant to certain provisions of Section 386.420.4 RSMo., the Commission is required as part of a rate case such as this one to approve a reconciliation, "sufficient to permit a reviewing court and the commission on remand from a reviewing court to determine how the public utility's rates and charges, including the rates and charges for each customer class, would need to be temporarily and, if applicable, permanently adjusted to provide customers or the public utility with any monetary relief that may be due" The Commission is required to afford the parties to the case a reasonable opportunity to provide written input prior to approving the reconciliation.
- 3. In consultation with other parties, the Company has prepared a reconciliation addressing the monetary impact of issues raised in the various applications for rehearing, attached hereto as Exhibit A, which it believes satisfies the requirements of Section 386.420.4 RSMo.

4. KCP&L notes that in preparing and proposing the attached reconciliation for the Commission's approval, neither KCP&L nor any other party nor the Commission itself should be deemed as taking any position regarding what monetary relief may be due upon the issuance of a final non-appealable order resolving this proceeding. KCP&L therefore suggests that in its order approving the attached reconciliation, the Commission so indicate.

5. Counsel for the Midwest Energy Consumers Group ("MECG") has authorized undersigned counsel to represent that MECG has no objection to the contents of this pleading.

WHEREFORE, KCP&L respectfully requests that after providing the other parties a reasonable opportunity to provide input, the Commission approve this reconciliation.

Respectfully submitted,

|s| Robert J. Hack

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 8th day of October, 2015.

|s| Robert J. Hack

Robert J. Hack

Kansas City Power & Light MPSC Case No. ER-2014-0370 Reconciliation of Issues Decided by the Commission Revenue Requirement Impact

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ROE:	Revenue Requirement Change From Order
9.50% Per order	From Order
9.10% Per MIEC/MECG	(\$8,400,218)
10.30% Per KCP&L	\$16,713,621
(Note: A 10 basis point change in ROE equates to \$2.1M in RR)	Ψ10,710,021
Rate Case Expense:	
Per OPC	(\$145,891)
Per KCP&L	\$90,888
Net Operating Losses:	_
Per MECG	(\$726,938)
Expiring KMEA Contracts:	_
Per MECG	(\$814,083)
SPP Transmission Expense Including IPL - Forecast:	_
Per KCP&L	\$5,000,000 (1)
CIP/Cybersecurity O&M Expense - Forecast:	
Per KCP&L	\$3,500,000 (2)
Property Tax Expense - Forecast:	
Per KCP&L	\$5,600,000 (3)

- (1) Although approval of a Fuel Adjustment Clause (FAC) for 95% of Southwest Power Pool (SPP) transmission expenses or a tracker for such expenses would not have impacted the level of rates set by the Report and Order, such approval would have affected future rates. Because KCP&L will record the level of SPP transmission expenses actually incurred during the period when the rates set by the Report and Order are in effect, and pending Commission decision on other aspects of this tracker/FAC issue, the impact of this aspect of the Report and Order will be available in the future.
- (2) Although approval of a tracker for Critical Infrastructure Protection (CIP) and Cyber-security Operations & Maintenance (O&M) expenses would not have impacted the level of rates set by the Report and Order, such approval would have affected future rates. Because KCP&L will record the level of CIP/Cyber-security O&M expenses actually incurred during the period when the rates set by the Report and Order are in effect, and pending Commission decision on other aspects of this tracker issue, the impact of this aspect of the Report and Order will be available in the future.
- (3) Although approval of a tracker for property tax expenses would not have impacted the level of rates set by the Report and Order, such approval would have affected future rates. Because KCP&L will record the level of property tax expenses actually incurred during the period when the rates set by the Report and Order are in effect, and pending Commission decision on other aspects of this tracker issue, the impact of this aspect of the Report and Order will be available in the future.

<u>Fuel Adjustment Clause:</u> Although approval of a FAC did not impact the level of rates set by the Report and Order, such approval will affect future rates. KCP&L will track and record (a) amounts billed to customers under the FAC and (b) amounts credited to customers under the FAC. The impact of this aspect of the Report and Order will therefore be available in the future.

<u>Commission's Order Regarding Compliance Tariff Sheets:</u> Although the Order Regarding Compliance Tariff Sheets did not impact the level of rates set by the Report and Order, the Commission's Order Regarding Compliance Tariff Sheets implemented an annual rate increase of \$89,671,644 (approximately \$245,676 per day on average) for service rendered on and after September 29, 2015.

Kansas City Power & Light MPSC Case No. ER-2014-0370 Reconciliation of Issues Decided by the Commission **Revenue Requirement Impact**

Issue: ROE - 9.10% Per MIEC/MECG Value: (\$8.400.218)

Value: (\$8,400,218)	Impact		
	 Amount		
LARGE POWER TOTAL	\$ (1,488,394)	-0.985%	
LARGE GEN SVC TOTAL	\$ (1,952,929)	-0.985%	
MEDIUM GEN SVC TOTAL	\$ (1,138,493)	-0.986%	
SMALL GEN SVC TOTAL	\$ (543,718)	-0.986%	
RESIDENTIAL TOTAL	\$ (3,169,639)	-0.986%	
LIGHTING TOTAL:	\$ (107,046)	-0.986%	
TOTAL	\$ (8.400.218)	-0.986%	

Issue: ROE - 10.30% Per KCP&L

Value: \$16,713,621

LARGE POWER TOTAL
LARGE GEN SVC TOTAL
MEDIUM GEN SVC TOTAL
SMALL GEN SVC TOTAL
RESIDENTIAL TOTAL
LIGHTING TOTAL:
TOTAL

Issue: OPC Rate Case Expense

LARGE POWER TOTAL LARGE GEN SVC TOTAL MEDIUM GEN SVC TOTAL SMALL GEN SVC TOTAL **RESIDENTIAL TOTAL** LIGHTING TOTAL:

TOTAL

Value: (\$145,891)

Issue:	KCP&I	Rate	Case	Expense
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Value: \$90,888

LARGE POWER TOTAL LARGE GEN SVC TOTAL MEDIUM GEN SVC TOTAL SMALL GEN SVC TOTAL RESIDENTIAL TOTAL LIGHTING TOTAL: **TOTAL**

Issue: MECG Net Operating Losses

Value: (\$726,938)

LARGE POWER TOTAL LARGE GEN SVC TOTAL MEDIUM GEN SVC TOTAL SMALL GEN SVC TOTAL **RESIDENTIAL TOTAL** LIGHTING TOTAL:

Impact			
	Amount	Percent	
\$	(25,850)	-0.017%	
\$	(33,918)	-0.017%	
\$	(19,773)	-0.017%	
\$	(9,443)	-0.017%	
\$	(55,049)	-0.017%	
\$	(1,859)	-0.017%	
\$	(145,891)	-0.017%	

Impact

Percent

1.960%

1.960%

1.963%

1.963%

1.963%

1.963%

1.962%

Amount

2,961,405

3,885,674

2,265,219

1,081,816

6,306,521

16,713,621

212,985

\$

\$

\$

\$

\$

	Impact		
Amount		Amount	Percent
	\$	16,104	0.011%
	\$	21,130	0.011%
	\$	12,318	0.011%
	\$	5,883	0.011%
	\$	34,295	0.011%
	\$	1,158	0.011%
	\$	90,888	0.011%

 Amount	Percent
\$ 16,104	0.011%
\$ 21,130	0.011%
\$ 12,318	0.011%
\$ 5,883	0.011%
\$ 34,295	0.011%
\$ 1,158	0.011%
\$ 90,888	0.011%

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Amount		Percent	
\$	(128,803)	-0.085%	
\$	(169,003)	-0.085%	
\$	(98,523)	-0.085%	
\$	(47,052)	-0.085%	
\$	(274,294)	-0.085%	
\$	(9,264)	-0.085%	

Impact

Kansas City Power & Light MPSC Case No. ER-2014-0370

Reconciliation of Issues Decided by the Commission Revenue Requirement Impact

TOTAL \$ (726,938) -0.085%

Issue: MECG Expiring KMEA Contracts

Value: (\$814,083) Impact Amount Percent LARGE POWER TOTAL (144,243)-0.095% LARGE GEN SVC TOTAL \$ (189, 262)-0.095% \$ MEDIUM GEN SVC TOTAL (110,334)-0.096% SMALL GEN SVC TOTAL \$ (52,693)-0.096% **RESIDENTIAL TOTAL** \$ (307,177)-0.096% LIGHTING TOTAL: (10,374)-0.096% \$

 $\textbf{Issue:} \ \mathsf{KCP\&L} \ \mathsf{SPP} \ \mathsf{Transmission} \ \mathsf{Expense} \ \mathsf{Including} \ \mathsf{IPL-FAC/Tracker/Forecast}$

\$

(814,083)

-0.096%

Value: \$5,000,000

TOTAL

	Amount	Percent
LARGE POWER TOTAL	\$ 885,926	0.586%
LARGE GEN SVC TOTAL	\$ 1,162,427	0.586%
MEDIUM GEN SVC TOTAL	\$ 677,657	0.587%
SMALL GEN SVC TOTAL	\$ 323,633	0.587%
RESIDENTIAL TOTAL	\$ 1,886,641	0.587%
LIGHTING TOTAL:	\$ 63,716	0.587%
TOTAL	\$ 5,000,000	0.587%

Issue: KCP&L CIP/Cybersecurity O&M Expense - Tracker/Forecast

Value: \$3,500,000 Impact

	 Amount	Percent
LARGE POWER TOTAL	\$ 620,148	0.410%
LARGE GEN SVC TOTAL	\$ 813,699	0.410%
MEDIUM GEN SVC TOTAL	\$ 474,360	0.411%
SMALL GEN SVC TOTAL	\$ 226,543	0.411%
RESIDENTIAL TOTAL	\$ 1,320,649	0.411%
LIGHTING TOTAL:	\$ 44,601	0.411%
TOTAL	\$ 3.500.000	0.411%

Issue: KCP&L Property Tax Expense - Tracker/Forecast

Value: \$5,600,000 Impact

	Amount	Percent
LARGE POWER TOTAL	\$ 992,237	0.657%
LARGE GEN SVC TOTAL	\$ 1,301,919	0.657%
MEDIUM GEN SVC TOTAL	\$ 758,975	0.658%
SMALL GEN SVC TOTAL	\$ 362,469	0.658%
RESIDENTIAL TOTAL	\$ 2,113,038	0.658%
LIGHTING TOTAL:	\$ 71,362	0.658%
TOTAL	\$ 5,600,000	0.657%