# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas City Power &	)	
Light Company and KCP&L Greater Missouri Operations	)	
Company for the Issuance of an Accounting Authority Order	)	File No. EU-2014-0077
Relating to their Electrical Operations and for a Contingent	)	
Waiver of the Notice Requirement of 4 CSR 240-4 020(2)	)	

#### KANSAS CITY POWER & LIGHT COMPANY'S REPLY TO STAFF'S RESPONSE

COMES NOW Kansas City Power & Light Company ("KCP&L" or "Company") and hereby files its Reply to Missouri Public Service Commission ("Commission") Staff's ("Staff") Response to KCP&L's Application for Clarification.

#### I. The Company is not requesting an advisory opinion.

- 1. Staff alleges that the Company is requesting an advisory opinion, but fails to cite any language to support this claim. On the contrary, the Company requests that the Commission clarify that it was not deciding in this case the issue of when a request for a fuel adjustment clause ("FAC") can be filed. Paragraph 4 of KCP&L's Application for Clarification requests that the Commission clarify that it did not mean to limit in its Report and Order when KCP&L can file a rate case requesting an FAC that includes recovery of transmission costs.
- 2. The Company agrees with Staff that the issue is not yet ripe and the issue will almost certainly arise<sup>1</sup> in KCP&L's upcoming rate case. By providing the clarification that the Company is requesting, the issue will be decided at the proper time in the Company's upcoming rate case.

WHEREFORE, KCP&L renews its request for clarification as outlined above and in its original application for clarification.

<sup>&</sup>lt;sup>1</sup> The issue did arise in KCP&L's recent Missouri Energy Efficiency Investment Act case (File No. EO-2014-0095) in which the Commission approved on June 15, 2014, a Stipulation and Agreement that included a demand-side investment mechanism rider which provides for recovery of certain energy efficiency and demand-side programs outside of a rate 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 the certified service list in this proceeding this 14<sup>th</sup> day of October, 2014.

|s| Roger W. Steiner

Roger W. Steiner