

**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)

**SURREPLY TO RESPONSE IN OPPOSITION
TO MOTION FOR RECONSIDERATION OF PROCEDURAL SCHEDULE**

COMES NOW Kansas City Power & Light Company (“KCP&L” or “Company”) and respectfully files this Surreply to the *Response In Opposition To Motion for Reconsideration of Procedural Schedule* filed by the Missouri Office of the Public Counsel (“Public Counsel”) on December 24, 2014. In support, KCP&L states as follows:

1. In opposing its *Motion for Reconsideration of Procedural Schedule* Public Counsel argues that KCP&L’s request for relief should be denied because 1) KCP&L “. . . agrees that the issues raised [in its *Motion for Reconsideration of Procedural Schedule*] are not ripe for Commission determination” ; and 2) “KCPL wants to manipulate the procedural schedule so that only costs associated with a plant which was not in service either during the test year or the true-up period, are included in rates and, in so doing, preclude the availability of any offsets to those costs.” Both of these Public Counsel arguments are wrong.

2. In its *Motion for Reconsideration of Procedural Schedule*, KCP&L asked the Commission to put in place a deadline for KCP&L to request a 30- or 60-day extension of the procedural schedule in the event delays are experienced in placing the La Cygne Environmental Project in-service. Putting such a deadline in place would serve to facilitate an orderly process for the handling of this case which is precisely the purpose of a procedural schedule. KCP&L has not asked the Commission to decide anything that is not yet ripe for determination, and Public Counsel’s arguments otherwise overstate the relief KCP&L has requested.

3. Public Counsel's continued reliance on *Southwestern Bell* is similarly misplaced. Unlike the telecommunications facilities in *Southwestern Bell*, the La Cygne Environmental Project will not enable KCP&L to serve additional load or new customers. To be clear, there are no new or additional revenue sources that the La Cygne Environmental Project will enable KCP&L to serve upon its completion. Consequently, Public Counsel is simply wrong in stating that: "[I]f the La Cygne upgrades are not in service by May 31, 2015, no revenues from the use of that facility or potential offsets to expenses from operation would be reflected in the test year or true-up period. Instead only the costs would be considered."

WHEREFORE, KCP&L respectfully requests that the Commission grant its *Motion for Reconsideration of Procedural Schedule*.

Respectfully submitted,

/s/ Robert J. Hack

Robert J. Hack, MBN 36496
Phone: (816) 556-2791
E-mail: rob.hack@kcpl.com
Roger W. Steiner, MBN 39586
Phone: (816) 556-2314
E-mail: roger.steiner@kcpl.com
Kansas City Power & Light Company
1200 Main – 16th Floor
Kansas City, Missouri 64105
Fax: (816) 556-2787

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, this 2nd day of January, 2015, to all parties of record.

/s/ Robert J. Hack

Robert J. Hack