

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

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Approval to Make Certain Changes in its)
Charges for Electric Service.)
Case No. ER-2010-0356

**RESPONSE OF KCP&L GREATER MISSOURI OPERATIONS COMPANY
TO SUGGESTIONS REGARDING FUEL ADJUSTMENT CLAUSE
COMPLIANCE TARIFFS**

KCP&L Greater Missouri Operations Company (“GMO” or the “Company”) states the following in response to Staff Suggestions Regarding Order of Clarification and Modification; Ag Processing, Inc. and the Sedalia Industrial Energy Users’ Association (“Industrial Intervenors”) Response to Staff’s Suggestions Regarding Effective Date of FAC Tariffs; and, Staff Reply to Response of Industrial Intervenors:

1. On May 31, 2011, the Staff filed “Suggestions Regarding Order of Clarification and Modification.” These suggestions related to the proper date for the effective date of GMO’s Fuel Adjustment Clause (FAC) tariffs. On June 1, Ag Processing and the Sedalia Industrial Energy Users Association filed a response to Staff. Also on June 1, Staff filed a response to the Industrials’ pleading.

2. GMO agrees with the Staff’s position that the FAC tariffs should be effective on June 4, 2011. With a July 1, 2011 effective date for the GMO FAC tariffs, there will be a mismatch in the base energy costs in the FAC and the revenue requirements for setting new general rates for MPS and L&P.

3. GMO also agrees that the Commission has made fuel adjustment tariff sheets effective on dates other than the first of the month in other cases as noted by Staff in paragraph 6 of its June 1 reply.

4. If the Commission determines that it wants to reverse its previous Order issued on May 27th and have the FAC tariffs go into effect on June 4, 2011, then minor tariff changes must be ordered by the Commission. Besides changing the effective dates at the bottom of the tariff sheets, the phrase at the top of the FAC tariff sheets must be changed to reflect the applicable period covered by the tariffs. Specifically, for tariff sheets 127.1 through 127.5, the phrase at the top of the tariff sheets: “Applicable to Service Provided September 1, 2009 through June 30, 2011” will need to be replaced with the phrase: “Applicable to Service Provided September 1, 2009 through June 3, 2011.” On tariff sheets 127.6 through 127.10, the phrase: “Applicable to Service Provided July 1, 2011 and Thereafter” will need to be replaced with the phrase: “Applicable to Service Provided June 4, 2011 and Thereafter.”

5. However, the Commission has already determined this issue in its May 27, 2011 Order of Clarification and Modification. GMO is willing to accept either date as the effective date for the FAC tariffs so long as the June 4, 2011 effective date for GMO’s non-FAC tariffs is not impacted. Any delay in the effective date of GMO’s non-FAC tariffs will cost the Company about \$200,000 per day.

WHEREFORE, GMO respectfully submit these comments in response to the Staff and the Industrial Intervenors.

Respectfully submitted,

/s/ Roger W. Steiner

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Attorneys for KCP&L Greater Missouri Operations
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing was served upon counsel of record on this 2nd day of June, 2011.

/s/ Roger W. Steiner

Roger W. Steiner