

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

In the Matter of the Application of Kansas)
City Power & Light Company for the)
Issuance of an Depreciation Authority) File No.: EO-2015-
Order Relating to Its Electrical Operations)

**APPLICATION OF KANSAS CITY POWER & LIGHT COMPANY
FOR A DEPRECIATION AUTHORITY ORDER**

Pursuant to Mo. Rev. Stat. 386.250 and 393.140¹ and 4 CSR 240-2.060, Kansas City Power & Light Company (“KCP&L” or “Applicant”) hereby requests that the Missouri Public Service Commission (“Commission”) issue a Depreciation Authority Order (“DAO”) authorizing KCP&L to depreciate certain accounts with a specific depreciation rate.

1. Applicant’s legal name is Kansas City Power & Light Company. KCP&L is a Missouri corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. KCP&L is primarily engaged in generation, transmission, distribution and sale of electricity in western Missouri and eastern Kansas. KCP&L is an “electrical corporation” and a “public utility” subject to the jurisdiction, supervision, and control of the Commission under Chapters 386 and 393.

2. KCP&L’s Certificate of Good Standing was filed in Case No. EF-2002-315 and is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G).

3. KCP&L has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court, which involve customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of the Application. KCP&L has no annual reports or regulatory assessment fees that are overdue in Missouri.

¹ Unless otherwise noted, all citations are to the Revised Statutes of Missouri (2010), as amended.

4. In addition to serving counsel named below, all correspondence, pleadings, notices, orders, decisions, and communications regarding this proceeding should be sent to:

Tim M. Rush
Director, Regulatory Affairs
Kansas City Power & Light Company
1200 Main Street
Kansas City, MO 64105
Phone: (816) 556-2344
tim.rush@kcpl.com

5. Data requests concerning this Application should be addressed to Regulatory.Affairs@kcpl.com.

6. KCP&L requests the authorization of a depreciation rate for the following: (a) a separate depreciation rate for utility owned solar equipment currently included in its “Other Production – Generators” Plant account; (b) a new Other Production Plant account for miscellaneous wind assets which do not have a Commission established depreciation rate; (c) a new Distribution Plant account that was created by the Federal Energy Regulatory Commission (“FERC”) for energy storage equipment for which there is no Commission established depreciation rate.

7. KCP&L currently records utility owned solar equipment into Account 34400 entitled “Other Production – Generators”. KCP&L anticipates setting up a new sub-account 34401 entitled “Other Production – Solar” and requests that a new depreciation rate be authorized for solar equipment. Based on a recent depreciation study conducted by Gannett Fleming, KCP&L requests that the depreciation rate for Account 34401 be authorized at 4.82%. The rate is based on a 20 year life span, a 45-R2 interim survivor curve and 0 percent net salvage.

8. KCP&L Account 34602 is entitled “Other Production – Miscellaneous Power Plant Equip - Wind”. Equipment in this account includes miscellaneous equipment devoted to

the power generating wind turbines not properly includible in any other accounts. Based on a recent depreciation study conducted by Gannett Fleming, KCP&L requests that the depreciation rate for Account 34602 be authorized at 7.15%. The rate is based on a 20 year life span, a 35-S2.5 interim survivor curve and 17 percent negative net salvage.

9. KCP&L Account 36300 is entitled “Distribution – Energy Storage Equipment”. FERC created the new account in response to changes in energy storage methods for the electric utility industry. Such equipment includes batteries used to store energy from solar panels. Based on a recent depreciation study conducted by Gannett Fleming, KCP&L requests that the depreciation rate for Account 36300 be authorized at 11.76%. The rate is based on a 10-L3 survivor curve and 0 percent net salvage.

10. Applicant presumes that Accounts 34401, 34602 and 36300 depreciation rates established in this case would be reviewed when the Applicant submits its next depreciation study and the associated depreciation rates are authorized by the Commission.

11. Granting the DAO requested herein will not impact customer rates. Although a DAO puts the Applicant in a position where it can, in future rate proceedings, request depreciation expense recovery in rates, a Commission order authorizing a DAO carries with it no guarantee that such rate recovery will be allowed. Applicant will seek recovery of these costs in general rate case proceedings.

12. Applicant does not believe that a request for a DAO should be considered a contested case subject to the notice requirement of 4 CSR 240-4.020(2). Applicant filed this application as soon as practicable so that the Commission can establish depreciation rates for these assets. Applicant requests that the Commission issue an Order approving the depreciation rates by December 31, 2014 in order to record book depreciation in calendar year 2014. Should the Commission conclude that the filing of this Application is likely to be

contested case and subject to the notice of filing requirement of 4 CSR 240-4.020(2), Applicant request a waiver for good cause shown pursuant to 4 CSR 240-4.020(2)(B).

13. WHEREFORE, for the reasons stated above, Applicant requests that the Commission grant Applicant's application and:

a) issue a DAO to Applicant authorizing it to utilize a 4.82% depreciation rate for Account 34401 Other Production – Solar;

b) issue a DAO to Applicant authorizing it to utilize a 7.15% depreciation rate for the assets recorded in Account 34602 Other Production – Miscellaneous Power Plant Equip - Wind;

c) issue a DAO to Applicant authorizing it to utilize a 11.76% depreciation rate for the assets recorded in Account 36300 Distribution – Energy Storage Equipment; and

d) provide the Applicant such other relief that the Commission believes is necessary and appropriate and that is not inconsistent with the DAOs requested in this application.

Respectfully submitted,

/s/ Roger W. Steiner


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ATTORNEY FOR KANSAS CITY POWER &
LIGHT COMPANY

VERIFICATION

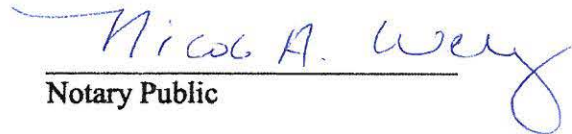
STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

Tim M. Rush, being first duly sworn, on his oath and in his capacity as Director, Regulatory Affairs, states that he is authorized to execute this Application on behalf of Kansas City Power & Light Company, and has knowledge of the matters stated in this Application, and that said matters are true and correct to the best of his knowledge, information and belief.



Tim M. Rush

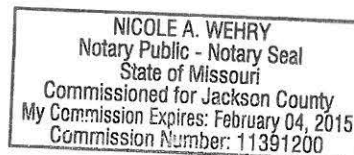
Subscribed and sworn to before me this 3rd day of October, 2014.



Notary Public

My commission expires:

Feb. 4 2015



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application was served either by electronic mail or by first class mail, postage prepaid, on this 3rd October, 2014, upon:

General Counsel
Missouri Public Service Commission
P.O. Box 360
200 Madison St., Suite 800
Jefferson City, MO 65102

Office of the Public Counsel
P.O. Box 2230
200 Madison St., Suite 650
Jefferson City, MO 65102

/s/ Roger W. Steiner

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