

**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)
a General Rate Increase for Electric Service) Case No. ER-2012-0174

In the Matter of KCP&L Greater Missouri)
Operations Company’s Request for Authority to)
Implement General Rate Increase for Electric)
Service.) Case No. ER-2012-0175

MOTION TO APPROVE RECONCILIATION

COMES NOW Missouri Energy Consumers’ Group (“MECG”) and the Office of the Public Counsel (“OPC”), by and through counsel, and pursuant to Section 386.420.4, hereby filed this *Motion to Approve Reconciliation*. In support thereof, MECG and OPC respectfully state as follows:

1. On January 9, 2013, the Commission issued its Report and Order in this proceeding. On January 23, 2013, the Commission issued its Order Granting Expedited Treatment, Overruling Objection and Approving Compliance Tariffs. As set forth in numerous pleadings and Applications for Rehearing, the Commission’s order is unlawful, unreasonable, based upon improper procedure and is an abuse of discretion.

2. Pursuant to certain provisions of Section 386.420.4, 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. MECG and OPC have prepared a reconciliation, which is attached hereto, which it believes satisfies the requirements of Section 386.420.4.

WHEREFORE, MECG and OPC respectfully request that after providing the other parties a reasonable opportunity to provide input, the Commission approve this reconciliation.

Respectfully submitted,



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OFFICE OF THE PUBLIC COUNSEL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

A handwritten signature in black ink, appearing to read "David L. Woodsmall". The signature is written in a cursive style with a large initial "D".

David L. Woodsmall

Dated: February 6, 2013

RECONCILIATION

1. Failure to segregate KCPL energy efficiency costs to avoid charging energy efficiency costs to opt out customers:

Value: \$0.001 / kwh for each opt out customer

2. Approval of compliance tariffs on an unlawful procedure and without providing reasonable time for parties to review tariffs and prepare and file an application for rehearing:

Value :

▶ KCPL: $\$67,390,893 / 365 \text{ days} = \$184,633$ per day for each day after January 23, 2013 (the day on which tariffs were unlawfully approved)

▶ GMO-MPS: $\$26,245,608 / 365 \text{ days} = \$71,906$ per day for each day after January 23, 2013 (the day on which tariffs were unlawfully approved)

▶ GMO-L&P: $\$21,696,437 / 365 \text{ days} = \$59,442$ per day for each day after January 23, 2013 (the day on which tariffs were unlawfully approved)