

KANSAS CITY POWER & LIGHT COMPANY

1330 BALTIMORE AVENUE

P.O. BOX 679

KANSAS CITY, MISSOURI 64141

LAW DEPARTMENT  
(816) 556-2785

January 26, 1987

Mr. Harvey G. Hubbs, Secretary  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, Missouri 65102

RE: Case No. AO-87-48

Dear Mr. Hubbs:

Please find enclosed the original and fourteen copies of the Limited Response of Kansas City Power & Light Company to Comments of Staff. Please file.

All parties of record have been served with a copy of this document.

Very truly yours,

  
Mark G. English

MGE:cb  
Enc.

cc: All Parties of Record

RECEIVED

JAN 28 1987

MO. PUBLIC SERVICE COMM.

FILED

JAN 28 1987

PUBLIC SERVICE COMMISSION



STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION

FILED

JAN 28 1987

PUBLIC SERVICE COMMISSION

In the matter of the investigation of )  
the revenue effects upon Missouri ) Case No. AO-87-48  
utilities of the Tax Reform Act of 1986 )

LIMITED RESPONSE OF  
KANSAS CITY POWER & LIGHT COMPANY  
TO COMMENTS OF STAFF

Comes now Kansas City Power & Light Company (KCPL), and makes the following limited response to the January 9, 1987 Comments of Staff in this matter.

1. In its Comments, Staff has proposed the concept that the Commission require all jurisdictional utilities to file a tariff or schedule which would have the effect of making all their rates and charges as of July 1, 1987, interim and subject to refund. Alternatively, Staff has proposed that the Commission require the filing of tariffs or schedules which would make such rates and charges interim and subject to refund "only to the extent that there has been a reduction in revenue requirement due to the TRA." Staff has requested that the Commission order the jurisdictional utilities to file comments (a) as to the appropriateness and lawfulness of these alternatives, and (b) detailing "the offsetting cost increases or other factors which cause the companies to believe that their rates are not excessive in spite of the impact of the TRA" by February 15, 1987.

2. This response of KCPL is not directed to the substantive aspects of Staff's comments, or to whether the Commission should issue the requested Order. Rather, the response is limited to the

question of an appropriate filing date for the utilities' comments, should such be ordered by the Commission.

3. In its Order dated November 3, 1987, the Commission required utilities to file on or before February 28, 1987, certain schedules showing, among other things, the revenue requirement of the federal tax changes on the utilities' 1986 Missouri jurisdictional operations. This required filing will certainly show if "cost increases or other factors" offset the effects of the Tax Reform Act of 1986. Staff's requested February 15 filing in essence accelerates the scheduled February 28 filing by two weeks. This acceleration would put unreasonable and unnecessary burdens on the utilities.

4. KCPL thus suggests that, should the Commission issue an Order requiring the comments suggested by the Staff, the Commission set February 28, 1987 as the earliest filing date for such comments. This single filing date will allow the utilities to present one comprehensive filing on this matter, according to the schedule on which they have been progressing since November 3, 1986.

WHEREFORE, KCPL respectfully suggests that, should the Commission order jurisdictional utilities to file the comments requested in Staff's January 9, 1987 Comments, that the filing date be fixed as February 28, 1987.

Respectfully submitted,



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Mark G. English  
1330 Baltimore Avenue  
Kansas City, Missouri 64105  
(816)556-2784

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was mailed, postage prepaid, this 26 day of January, 1987, to:

Robert C. Johnson  
720 Olive Street  
24th Floor  
St. Louis, Missouri 63101

J. B. Schnapp  
Robin E. Fulton  
135 E. Main Street  
Fredericktown, Missouri 63645

Robert Lehr  
1100 Main  
Suite 1405  
Kansas City, Missouri 64105

Donald Johnstone  
Drazen-Brubaker & Assoc.  
605 Old Ballas Road  
Suite 100  
P. O. Box 12710  
St. Louis, Missouri 63141

Paul W. Phillips  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Room 6D-033  
Washington, D.C. 20585

Stuart Conrad  
2600 Mutual benefit Life Building  
2345 Grand Avenue  
Kansas City, Missouri 64108

Paul Agathen  
Union Electric Company  
P. O. Box 149  
St. Louis, Missouri 63166

Francis J. Hruby  
Anheuser-Busch, Inc.  
One Busch Place  
St. Louis, Missouri 63118

Steven L. Kitchen  
Vice President - Finance  
The Kansas Power & Light Company  
818 Kansas Avenue  
P. O. Box 889  
Topeka, Kansas 66601

Joseph P. Cowin  
United Telephone Company of Misosuri  
6666 West 110th Street  
Overland Park, Kansas 66211

H. Edward Skinner  
Ivester, Henry, Skinner & Camp  
212 Center Street, Suite 900  
Little Rock, Arkansas 72201

Gary W. Duffy  
P. O. Box 456  
Jefferson City, Missouri 65102

J. E. Harrison  
Missouri-American Water Co.  
2707 Pembroke Lane  
St. Joseph, Missouri 64505

John Eckert  
Consolidated Water Services, Inc.  
1000 N. Madison  
P. O. Box 329  
Greenwood, Indiana 46142

L. D. Abbott  
General Telephone Company of Midwest  
11 Eleventh Avenue  
Grinnell, Iowa 50112

Michael A. Meyer  
Southwestern Bell Telephone Company  
100 N. Tucker Boulevard  
St. Louis, Missouri 63101

R. C. Jaudes  
Laclede Gas Company  
720 Olive Street  
St. Louis, Missouri 63101

Richard T. Ciottone  
St. Louis County Water Company  
535 N. New Ballas Road  
St. Louis, Missouri 63141

W. R. England  
P. O. Box 456  
Jefferson City, Missouri 65102

James Swearengen  
P. O. Box 456  
Jefferson City, Missouri 65102

Bob Perkins  
Tel Central of Jefferson City  
130 E. High Street  
Jefferson City, Missouri 65101

Richard W. French  
P. O. Box 7800  
Jefferson City, Missouri 65102

Gerald Hill  
General Waterworks Management & Service Co.  
950 Havenford Road  
Bryn Mawr, Pennsylvania 19010

Gerald T. McNeive, Jr.  
Laclede Gas Company  
720 Olive  
St. Louis, Missouri 63101

E. L. McKenzie  
Assoc. Natural Gas Company  
P. O. Box 628  
Blytheville, Arizona 72316

Douglas Walther  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, Missouri 65102

John Low  
ASARCO, Inc.  
P. O. Box 116  
Bunker, Missouri 63629

Richard Wrench  
Great River Gas Company  
P. O. Box 967  
Kiokuk, Iowa 62632

Timothy M. Rush  
St. Joseph Light and Power Company  
520 Francis Street  
St. Joseph, Missouri 64502

Jack Krokroskie  
Doe Run Company  
Box 500  
Viburnum, Missouri 65566

Mark G. English