BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Lig	ght)	
Company and KCP&L Greater Missouri)	
Operations Company's Application for)	File No. EA-2014-
Approval of Cost Allocation Manual)	

APPLICATION FOR APPROVAL OF COST ALLOCATION MANUAL

COMES NOW Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") (collectively, the "Company"), by and through counsel, and files this Application for approval of its Cost Allocation Manual ("CAM"). In support thereof, the Company respectfully states to the Missouri Public Service Commission ("Commission"):

- 1. KCP&L and GMO are corporations duly organized and existing under the laws of the State of Missouri and the State of Delaware, respectively. Applicants are duly authorized to transact business in the State of Missouri. Their principal office and place of business is located at 1200 Main Street, Kansas City, Missouri 64105. Under operating authority granted by the Commission, the Applicants provide service in Missouri as electric utilities and also as a heating company (GMO only). Certified copies of KCP&L's Certificate of Good Standing were filed in Case No. EM-2000-753 and GMO's Certificate of Authority to do business as a foreign corporation was filed in Case No. EU-2002-1053, and those documents are incorporated herein by reference, as allowed by 4 CSR 240-2.060(1)(G).
- 2. KCP&L has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or rates, which has occurred within three years of the date of this Application other than the following pending

action: *Mike Layton v. Kansas City Power & Light Company*, Case No. EC-2014-0122. In addition, no annual report or assessment fees are overdue.

- 3. GMO has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or rates, which has occurred within three years of the date of this Application other than the following pending action: *Ag Processing, Inc. a Cooperative v. KCP&L Greater Missouri Operations Company*, Case No. HC-2012-0259. In addition, no annual report or assessment fees are overdue.
- 4. In addition to serving counsel named below, all correspondence, pleadings, notices, orders, decisions, and communications regarding this proceeding should be sent to:

Ronald A. Klote Senior Manager – Regulatory Accounting Kansas City Power & Light Company 1200 Main Street, 19th Floor Kansas City, MO 64105 Telephone: (816) 701-7875

Facsimile: (816) 556-2110

E-mail: Ronald.Klote@kcpl.com

- 5. Data requests concerning this Application should be addressed to Regulatory.Affairs@kcpl.com.
- 6. By this Application, the Company seeks Commission approval of its CAM. The Company agreed to file for Commission approval of its CAM in the Non-Unanimous Stipulation and Agreement ("Stipulation") filed in File No. EA-2013-0098 and EO-2012-0367. That Stipulation was approved by the Commission by its Report and Order issued August 7, 2013. The CAM is attached as Schedule RAK-1 to the Direct Testimony of Ronald A. Klote which is being filed with this Application.
- 7. The CAM identifies how balance sheet and income statements items may be assigned, allocated or applied to the various Great Plains Energy Incorporated companies and

explains the cost assignment methods, allocation policies and related procedures that serve as guidelines in producing separate affiliate company financial statements in accordance with applicable rules. The cost assignment methods, allocation policies and fair market pricing are designed to meet the rules and regulations of the Federal Energy Regulatory Commission, the Securities and Exchange Commission, applicable state regulatory commissions and Missouri's Affiliate Transaction Rules found in 4 CSR 240-20.015.

- 8. The Company requests that the Commission establish a January prehearing conference so that the Missouri Public Service Commission Staff, the Office of the Public Counsel and other interested parties may discuss a schedule for the review of the CAM. The Company proposes the schedule below for the processing of this Application.
- 9. The Company respectfully request that the Regulatory Law Judge, the Staff of the Commission, the Office of the Public Counsel, and any intervening parties consider the following timeline as a procedural schedule is developed for this case:

January 30, 2014 Prehearing/Settlement Conference

February 27, 2014 Settlement Conference

March 27, 2014 Staff and Intervenor Rebuttal Testimony

April 25, 2014 Surrebuttal Testimony

May 22 and 23, 2013 Evidentiary Hearings

WHEREFORE, the Company respectfully requests approval of the CAM and that the

Commission establish a prehearing conference and other such other relief as it deems necessary.

|s| Roger W. Steiner

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Attorneys for Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing Application has been hand-delivered, emailed or mailed, postage prepaid, this 16th day of December, 2013 to the Office of the General Counsel and the Office of the Public Counsel.

s Roger W. Steiner

Roger W. Steiner

VERIFICATION

STATE OF MISSOURI)	
)	SS
COUNTY OF JACKSON)	

I, Ronald A. Klote, having been duly sworn upon my oath, state that I am Senior Manager, Regulatory Accounting of Kansas City Power & Light Company ("KCP&L"), that I am authorized to make this verification on behalf of KCP&L and KCP&L Greater Missouri Operations Company, and that the matters stated in the foregoing Application are true and correct to the best of my information, knowledge, and belief.

Ronald A. Klote

Senior Manager, Regulatory Accounting Kansas City Power & Light Company

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SUBSCRIBED AND SWORN TO before me this 16th day of December, 2013.

Notary Public

My Commission Expires: T-lb. 42015

MICOLE A. WEHRY
Notary Fublic - Notary Seal
State of Missouri
Commissioned for Jackson County
My Commission Expires: February 04, 2015
Commission Technology 11391200