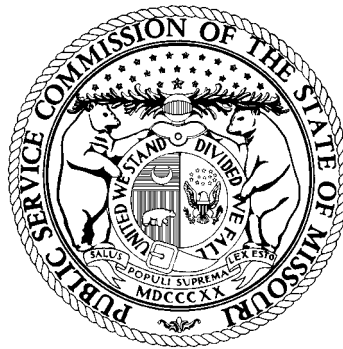


MISSOURI PUBLIC SERVICE COMMISSION

STAFF REPORT

CLASS COST OF SERVICE and RATE DESIGN



KCP&L GREATER MISSOURI OPERATIONS COMPANY

CASE NO. ER-2009-0090

*Jefferson City, Missouri
February 27, 2009*

**STAFF REPORT
CLASS COST-OF-SERVICE
and RATE DESIGN**

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STAFF CLASS COST-OF-SERVICE & RATE DESIGN REPORT

I. STAFF RATE DESIGN RECOMMENDATION

The Staff recommends that any overall revenue increase granted to KCP&L Greater Missouri Operations Company (GMO) be accomplished by an equal percentage increase to each customer class and within each class to each rate component of each rate schedule. GMO is the new name of Aquila, Inc., which provided electric service in two service territories in Missouri doing business as Aquila Networks-MPS (MPS) and Aquila Networks-L&P (L&P).

The latest comprehensive class cost-of-service and rate design review for GMO began in February 2002 in Case EO-2002-384. However, due to the large amount of data needed and the amount of analysis necessary to conduct a comprehensive class cost-of-service study, direct testimony was not filed until September 2005. The rate design case was settled by the stipulation and agreement that the Commission approved in Case No. ER-2005-0436. This rate design approved by the Commission was maintained by equal percentage increases to the customer classes in GMO's most recent rate case (Case No. ER-2007-0004). In this case equal percentage increases to each customer class and within each class to each rate component of each rate schedule for any increase in revenue requirement ordered in this case will also maintain the inter- and intra-class rate design from Case No. ER-2005-0436.

Staff intends to reexamine class cost-of-service and rate design subsequent to Iatan 2 being put into service because GMO will incur a large increase in capital costs associated with Iatan 2 and those costs will impact the GMO class revenue requirements.

Staff expert: Walt Cecil

II. FAC Expansion Factors

Staff updated system losses for GMO's operational areas L&P and MPS. This update included losses for metered secondary voltage, and metered primary voltage and above. In general, the estimated losses represent a slight reduction from previously documented losses.

These system losses are the basis for calculating the FAC expansion factors. The expansion factors account for the energy losses incurred in the transmission and distribution of energy from the generator to the customer. They are used in the FAC calculations to convert the cost per kWh, at the system input voltage, to the cost per kWh at the customer's metered voltage. Tables 1 and 2 provide the FAC expansion factors.

Table 1: L&P	
Voltage Level	Expansion Factor
Primary	1.0444
Secondary	1.0700

Table 2: MPS	
Voltage Level	Expansion Factor
Primary	1.0444
Secondary	1.0679

Staff Expert: David Roos

III. Fuel Adjustment Clause Tariff

Staff is recommending changes to the GMO fuel adjustment clause (FAC) tariff sheets in order to clarify some components in the formulas, to simplify some of the formulas, and to make the formulas more consistent with those of the FAC tariff provisions of other Missouri electric utilities. Staff is providing an example GMO FAC tariff as Attachment 1 (as initially provided by Tim Rush of KCP&L) to illustrate recommended changes to the current approved GMO FAC tariff. Attachment 2 (as initially provided by Tim Rush of KCP&L) is the example GMO FAC tariff with all the recommended changes incorporated.

Staff recommends that the GMO FAC tariff explicitly state the cost and revenue components that will be included in calculating the cost adjustment factor (CAF), and that those components include:

1. Actual cost of fuel in FERC Accounts 501 and 547;
2. Actual cost of purchased energy in FERC Account 555;
3. Actual emissions allowance cost in FERC Account 509;
4. Actual cost of participation in the Southwest Power Pool (SPP), specifically regarding SPP variable cost associated with energy imbalance market settlements and revenue neutrality uplift charges;
5. Revenue from off-system energy sales margin and any emission allowance sales; and
6. Actual cost of interest for deferred electric energy costs

Further, as regards the CAF formula, Staff recommends use of total net system input in kWh (NSI), as opposed to the use of billing sales found in the current CAF formula, as a way to simplify the CAF formula and to make it more consistent with the CAF formulas found in the FAC tariff provisions of other Missouri electric utilities . Other, less significant changes, are also reflected in the attached specimen tariff, and are recommended with the objective of making the entire FAC process more transparent and efficient.

Attachments 1 and 2 include base energy costs for GMO-L&P and for GMO-MPS and reflect Staff's estimates of direct base fuel and purchased power costs. These base energy costs and any future updated base energy costs should be allocated to GMO-L&P and GMO-MPS using the allocation methodology described in Staff's Cost of Service Report.

Staff Witness/Expert: John A. Rogers

STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 1 1st
 Canceling P.S.C. MO. No. _____

Original Sheet No. 124
 Sheet No. 124

Aquila, Inc., dba**KCP&L Greater Missouri Operations Company**

For Territory Formerly Served by

KANSAS CITY, MO 64106Aquila Networks - L&P and Aquila Networks ~~—~~ MPS (L&P and MPS)

FUEL ADJUSTMENT CLAUSE
ELECTRIC

DEFINITIONSACCUMULATION PERIODS, FILING DATES AND RECOVERY PERIODS:

The two six-month accumulation periods each year through August 5, 2013, the two corresponding twelve-month recovery periods and the filing dates will be as shown below. Each filing shall include detailed work papers in electronic format to support the filing, follows:

Accumulation Periods

June – November
December – May

Filing Dates

By January 1
By July 1

Recovery Periods

March – February
September – August

RECOVERY PERIOD:

The billing months during which the Cost Adjustment Factor (CAF) for each of the respective accumulation periods are applied to retail customer billings on a per kilowatt-hour (kWh) basis.

COSTS:

Costs eligible for Fuel Adjustment Clause (FAC) will be the Company's allocated variable Missouri Jurisdictional costs for the fuel component of the Company's generating units, including costs associated with the Company's fuel hedging program; purchased power energy charges, including applicable transmission fees; Southwest Power Pool (SPP) variable costs and emission allowance costs — all as incurred during the Accumulation Period. These costs will be offset by off-system sales margin and any emission allowance revenues collected during the Accumulation Period. Eligible costs do not include the purchased power demand costs associated with purchased power contracts.

APPLICABILITY

The price per kWh of electricity sold to retail customers will be adjusted (up or down) periodically subject to application of the FAC mechanism and approval by the Missouri Public Service Commission. ~~The price will reflect accumulation period Missouri Jurisdictional costs above or below base costs for:~~

- ~~1.variable fuel components related to the Company's electric generating plants;~~
- ~~2.purchased power energy charges;~~
- ~~3.emission allowance costs;~~
- ~~4.an adjustment for recovery period sales variation. This is based on the difference between the values of the FAC as adjusted minus actual FAC revenue during the recovery period. This amount will be collected or refunded during a succeeding recovery period;~~
- ~~5.interest on deferred electric energy costs, which shall be determined monthly. Interest shall be calculated at a rate equal to the weighted average interest rate paid on short term debt, applied to the month end balance of deferred electric energy costs. The accumulated interest shall be included in the determination of the CAF.~~

~~The FAC will be the aggregation of (1), (2), (3), minus the base cost of fuel, all times 95%, plus or minus (4), plus (5), above.~~

The ~~Cost Adjustment Factor CAF~~ is the result of dividing the FAC by forecasted net system input (NSI) estimated kWh sales during the recovery period, rounded to the nearest \$.0001, and aggregating over two accumulation periods. A CAF will appear on a separate line on retail customers' bills.~~The formula and components are displayed below.~~

Issued: September 5, 2008

Effective: August 5, 2009

Issued by: Chris B. Giles, Vice-President

STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 1 1st
 Canceling P.S.C. MO. No. _____

Original Sheet No. 125
 Sheet No. 125

Aquila, Inc., dba**KCP&L Greater Missouri Operations Company**

For Territory Formerly Served by

KANSAS CITY, MO 64106Aquila Networks - L&P and Aquila Networks — MPS (L&P and MPS)

FUEL ADJUSTMENT CLAUSE (CONTINUED)
 ELECTRIC

FORMULAS AND DEFINITIONS OF COMPONENTS

$$FAC_{Sec} = \{[95\% * (F + P + E - B)] * [(S_{ASec} * L_{Sec}) / ((S_{ASec} * L_{Sec}) + (S_{APrim} * L_{Prim}))]\} + C_{Sec}$$

$$FAC_{Prim} = \{[95\% * (F + P + E - B)] * [(S_{APrim} * L_{Prim}) / ((S_{ASec} * L_{Sec}) + (S_{APrim} * L_{Prim}))]\} + C_{Prim}$$

$$FAC = 95\% * ((TEC * J) - B) + C + I$$

$$CAF = FAC/NSI$$

The Cost Adjustment Factor (CAF) is as follows:

$$\text{Single Accumulation Period Secondary Voltage CAF}_{Sec} = \frac{CAF * XF_{Sec} * FAC_{Sec}}{S_{RSec}}$$

$$\text{Single Accumulation Period Primary Voltage CAF}_{Prim} = \frac{CAF * XF_{Prim} * FAC_{Prim}}{S_{RPrim}}$$

Annual Secondary Voltage CAF =

Aggregation of the Single Accumulation Period Secondary Voltage CAFs still to be recovered

Annual Primary Voltage CAF =

Aggregation of the Single Accumulation Period Primary Voltage CAFs still to be recovered

Where:

~~FAC_{Sec} = Secondary Voltage FAC~~

~~FAC_{Prim} = Primary Voltage FAC~~

~~95% = Customer responsibility for fuel variance from base level~~

~~TEC = Total energy cost, which consists of the sum of:~~

- ~~• F = Actual variable cost of fuel in FERC Accounts 501 & 547~~
- ~~• P = Actual cost of purchased energy in FERC Account 555~~
- ~~• E = Actual emission allowance cost in FERC Account 509~~
- ~~• SPP variable costs associated with energy imbalance market settlements and revenue neutrality uplift charges~~

~~Less:~~

- ~~• Off-system sales margin revenue and any emission allowance sales revenue~~

~~J = Missouri energy retail ratio = Missouri retail kWh sales/total system kWh sales~~

~~B = Base energy costs including variable fuel costs, purchased energy, transportation costs and emission allowances less off-system sales are calculated as shown below:~~

~~Aquila Networks — L&P S_A x Applicable Base Energy Cost~~

~~Aquila Networks — MPS S_A x Applicable Base Energy Cost~~

~~C = Under / Over recovery determined in the true-up of prior recovery period cost, including accumulated interest, and modifications due to prudence reviews~~

~~C_{Sec} = Lower than Primary Voltage Customers~~

~~C_{Prim} = Primary and Higher Voltage Customers~~

~~I = Interest on deferred electric energy costs calculated at a rate equal to the weighted average interest paid on short-term debt applied to the month-end balance of deferred electric energy costs~~

~~NSI = Forecasted Missouri net system input in kWh for the Recovery Period~~

~~XF = Expansion factor by voltage level~~

~~XF_{Sec} = Expansion factor for lower than primary voltage customers~~

~~XF_{Prim} = Expansion factor for primary and higher voltage customers~~

~~S_A = Actual sales (kWh) for the accumulation period~~

~~S_{ASec} = Lower than Primary Voltage Customers~~

~~S_{APrim} = Primary and Higher Voltage Customers~~

~~S_R = Estimated sales (kWh) for the recovery period~~

~~S_{RSec} = Lower than Primary Voltage Customers~~

~~S_{RPrim} = Primary and Higher Voltage Customers~~

~~L = Loss factor by voltage level~~

~~L_{Sec} = Lower than Primary Customers~~

~~L_{Prim} = Primary and Higher Customers~~

STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 1 1st Original Sheet No. 126
Canceling P.S.C. MO. No. _____ Sheet No. 126

Aquila, Inc., dba

KCP&L Greater Missouri Operations Company

For Territory Formerly Served by

KANSAS CITY, MO 64106

Aquila Networks - L&P and Aquila Networks — MPS (L&P and MPS)

FUEL ADJUSTMENT CLAUSE (CONTINUED)
ELECTRIC

The FAC will be calculated separately for L&P and MPS, Aquila Networks — L&P and Aquila Networks — MPS and by voltage level, and the resultant CAF's will be applied to customers in the respective divisions and voltage levels.

APPLICABLE BASE ENERGY COST

Company base energy cost per kWh sold:

\$0.01540-01799 for Aquila Networks — L&P for October through May until effective date of this tariff.

\$0.01600-02429 for Aquila Networks — L&P for June through September beginning with the effective date of this tariff.

\$0.02400-02538 for Aquila Networks — MPS for October through May until effective date of this tariff.

\$0.02880-03578 for Aquila Networks — MPS for June through September beginning with the effective date of this tariff.

TRUE-UPS AND PRUDENCE REVIEWS

There shall be prudence reviews of costs and the true-up of revenues collected with costs intended for collection. FAC costs collected in rates will be refundable based on true-up results and findings in regard to prudence. Adjustments, if any, necessary by Commission order pursuant to any prudence review shall also be placed in the FAC for collection unless a separate refund is ordered by the Commission. True-ups occur at the end of each recovery period. Prudence reviews shall occur no less frequently than at 18 month intervals.

Issued: September 5, 2008
Issued by: Chris B. Giles, Vice-President

Effective: August 5, 2009

STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No.	1	1 st	Original Sheet No.	127
Canceled P.S.C. MO. No.			Sheet No.	127

KCP&L Greater Missouri Operations Company
for all territories formerly served by Aquila Networks, Inc. – L&P and Aquila Networks, Inc. MPS
(L&P and MPS)
KANSAS CITY, MO 64106

FUEL ADJUSTMENT CLAUSE (CONTINUED)
ELECTRIC

COST ADJUSTMENT FACTOR

		<u>MPS</u>	<u>L&P</u>
<u>Accumulation Period Ending</u>		<u>11/30/08</u>	<u>11/30/08</u>
<u>1 Total Energy Cost (TEC)</u>			
<u>2 Jurisdictional Factor (J)</u>	*		
<u>3 First Interim Total</u>			
<u>4 Base energy cost (B)</u>	=		
<u>5 Second Interim Total</u>			
<u>6 Customer Responsibility</u>	*	<u>95%</u>	<u>95%</u>
<u>7 Third Interim Total</u>			
<u>8 Adjustment for Under / Over recovery for prior periods and Modifications due to prudence reviews (C)</u>	+		
<u>9 Interest (I)</u>	+		
<u>10 Fuel Adjustment Clause (FAC)</u>			
<u>11 NSI</u>	±		
<u>12 Fourth Interim Total</u>			
<u>13 Current period CAF_{Prim} (= Line 12 * XF_{Prim})</u>			
<u>14 Previous period CAF_{Prim}</u>	+		
<u>15 Current annual CAF_{Prim}</u>			
<u>16 Current period CAF_{Sec} (= Line 12 * XF_{Sec})</u>			
<u>17 Previous period CAF_{Sec}</u>	+		
<u>18 Current annual CAF_{Sec}</u>			

Expansion Factors (XF):

<u>Network:</u>	<u>Primary</u>	<u>Secondary</u>
MPS	1.0444	1.0679
L&P	1.0444	1.0700

Issued: December 30, 2008 Effective: March 1, 2009
Issued by: Tim Rush, Regulatory Affairs

STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 1 1st
 Canceling P.S.C. MO. No. _____

Original Sheet No. 124
 Sheet No. 124

KCP&L Greater Missouri Operations Company

For Territory Formerly Served by

KANSAS CITY, MO 64106

Aquila Networks - L&P and Aquila Networks – MPS (L&P and MPS)

FUEL ADJUSTMENT CLAUSE ELECTRIC

DEFINITIONS

ACCUMULATION PERIODS, FILING DATES AND RECOVERY PERIODS:

The two six-month accumulation periods each year through August 5, 2013, the two corresponding twelve-month recovery periods and the filing dates will be as shown below. Each filing shall include detailed work papers in electronic format to support the filing.

Accumulation Periods

June – November
 December – May

Filing Dates

By January 1
 By July 1

Recovery Periods

March – February
 September – August

RECOVERY PERIOD:

The billing months during which the Cost Adjustment Factor (CAF) for each of the respective accumulation periods are applied to retail customer billings on a per kilowatt-hour (kWh) basis.

COSTS:

Costs eligible for Fuel Adjustment Clause (FAC) will be the Company's allocated variable Missouri Jurisdictional costs for the fuel component of the Company's generating units, including costs associated with the Company's fuel hedging program; purchased power energy charges, including applicable transmission fees; Southwest Power Pool (SPP) variable costs and emission allowance costs – all as incurred during the Accumulation Period. These costs will be offset by off-system sales margin and any emission allowance revenues collected during the Accumulation Period. Eligible costs do not include the purchased power demand costs associated with purchased power contracts.

APPLICABILITY

The price per kWh of electricity sold to retail customers will be adjusted (up or down) periodically subject to application of the FAC mechanism and approval by the Missouri Public Service Commission.

The CAF is the result of dividing the FAC by forecasted net system input (NSI) during the recovery period, rounded to the nearest \$.0001, and aggregating over two accumulation periods. A CAF will appear on a separate line on retail customers' bills.

Issued: September 5, 2008
 Issued by: Chris B. Giles, Vice-President

Effective: August 5, 2009

KCP&L Greater Missouri Operations Company

For Territory Formerly Served by

KANSAS CITY, MO 64106

Aquila Networks - L&P and Aquila Networks – MPS (L&P and MPS)

FUEL ADJUSTMENT CLAUSE (CONTINUED)
ELECTRICFORMULAS AND DEFINITIONS OF COMPONENTS

$$FAC = 95\% * ((TEC * J) - B) + C + I$$

$$CAF = FAC/NSI$$

$$\text{Single Accumulation Period Secondary Voltage } CAF_{Sec} = CAF * XF_{Sec}$$

$$\text{Single Accumulation Period Primary Voltage } CAF_{Prim} = CAF * XF_{Prim}$$

$$\text{Annual Secondary Voltage } CAF =$$

Aggregation of the Single Accumulation Period Secondary Voltage CAFs still to be recovered

$$\text{Annual Primary Voltage } CAF =$$

Aggregation of the Single Accumulation Period Primary Voltage CAFs still to be recovered

Where:

95% = Customer responsibility for fuel variance from base level

TEC = Total energy cost, which consists of the sum of:

- Actual variable cost of fuel in FERC Accounts 501 & 547
- Actual cost of purchased energy in FERC Account 555
- Actual emission allowance cost in FERC Account 509
- SPP variable costs associated with energy imbalance market settlements and revenue neutrality uplift charges

Less:

- Off-system sales margin revenue and any emission allowance sales revenue

J = Missouri energy retail ratio = Missouri retail kWh sales/total system kWh sales

B = Base energy costs including variable fuel costs, purchased energy, transportation costs and emission allowances less off-system sales are calculated as shown below:

L&P S_A x Applicable Base Energy CostMPS S_A x Applicable Base Energy Cost

C = Under / Over recovery determined in the true-up of prior recovery period cost, including accumulated interest, and modifications due to prudence reviews

I = Interest on deferred electric energy costs calculated at a rate equal to the weighted average interest paid on short-term debt applied to the month-end balance of deferred electric energy costs

NSI = Forecasted Missouri net system input in kWh for the Recovery Period

XF = Expansion factor by voltage level

 XF_{Sec} = Expansion factor for lower than primary voltage customers XF_{Prim} = Expansion factor for primary and higher voltage customers S_A = Actual sales (kWh) for the accumulation period

STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 1 1st
Canceling P.S.C. MO. No.

Original Sheet No. 126
Sheet No. 126

KCP&L Greater Missouri Operations Company

For Territory Formerly Served by

KANSAS CITY, MO 64106

Aquila Networks - L&P and Aquila Networks – MPS (L&P and MPS)

FUEL ADJUSTMENT CLAUSE (CONTINUED)
ELECTRIC

The FAC will be calculated separately for L&P and MPS, and by voltage level, and the resultant CAF's will be applied to customers in the respective divisions and voltage levels.

APPLICABLE BASE ENERGY COST

Company base energy cost per kWh sold:

\$0.0154 for L&P for October through May

\$0.0160 for L&P for June through September

\$0.0240 for MPS for October through May

\$0.0288 for MPS for June through September

TRUE-UPS AND PRUDENCE REVIEWS

There shall be prudence reviews of costs and the true-up of revenues collected with costs intended for collection. FAC costs collected in rates will be refundable based on true-up results and findings in regard to prudence. Adjustments, if any, necessary by Commission order pursuant to any prudence review shall also be placed in the FAC for collection unless a separate refund is ordered by the Commission. True-ups occur at the end of each recovery period. Prudence reviews shall occur no less frequently than at 18 month intervals.

STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 1 1st
 Canceling P.S.C. MO. No. _____

Original Sheet No. 127
 Sheet No. 127

KCP&L Greater Missouri Operations Company
for all territories formerly served by Aquila Networks, Inc. – L&P and Aquila Networks, Inc. MPS
(L&P and MPS)
KANSAS CITY, MO 64106

FUEL ADJUSTMENT CLAUSE (CONTINUED)
 ELECTRIC

COST ADJUSTMENT FACTOR

		MPS	L&P
Accumulation Period Ending		11/30/08	11/30/08
1 Total Energy Cost (TEC)			
2 Jurisdictional Factor (J)	*		
3 First Interim Total			
4 Base energy cost (B)	-		
5 Second Interim Total			
6 Customer Responsibility	*	95%	95%
7 Third Interim Total			
8 Adjustment for Under / Over recovery for prior periods and Modifications due to prudence reviews (C)	+		
9 Interest (I)	+		
10 Fuel Adjustment Clause (FAC)			
11 NSI	÷		
12 Fourth Interim Total			
13 Current period CAF _{Prim} (= Line 12 * XF _{Prim})			
14 Previous period CAF _{Prim}	+		
15 Current annual CAF _{Prim}			
16 Current period CAF _{Sec} (= Line 12 * XF _{Sec})			
17 Previous period CAF _{Sec}	+		
18 Current annual CAF _{Sec}			

Expansion Factors (XF):

<u>Network:</u>	<u>Primary</u>	<u>Secondary</u>
MPS	1.0444	1.0679
L&P	1.0444	1.0700

Issued: December 30, 2008
 Issued by: Tim Rush, Regulatory Affairs

Effective: March 1, 2009

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

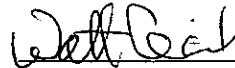
In the Matter of the Application of)
KCP&L Greater Missouri Operations)
Company for Approval to Make Certain)
Changes in its charges for Electric Service)

Case No. ER-2009-0090

AFFIDAVIT OF WALT CECIL

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Walt Cecil, employee of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that he has participated in preparing the accompanying Staff Report in pages 1 - 1, and that the facts therein are true and correct to the best of his knowledge and belief.




Walt Cecil

Subscribed and sworn to before me this 27 day of February, 2009.



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086


Notary Public

**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-2009-0090

AFFIDAVIT OF DAVID C. ROOS

STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

David C. Roos, employee of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that he has participated in preparing the accompanying Staff Report in pages 2-2, and that the facts therein are true and correct to the best of his knowledge and belief.



DAVID C. ROOS

Subscribed and affirmed before me this 26 day of February 2009.



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086



NOTARY PUBLIC

**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-2009-0090

AFFIDAVIT OF JOHN A. ROGERS

STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

John A. Rogers, employee of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that he has participated in preparing the accompanying Staff Report in pages 2-3, and that the facts therein are true and correct to the best of his knowledge and belief.



JOHN A. ROGERS

Subscribed and affirmed before me this 27 day of February 2009.



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086



NOTARY PUBLIC


STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 15th day of June 2012.





Steven C. Reed
Secretary