

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

In the Matter of the Application of KCP&L)	<u>File No. ER-2010-0356</u>
Greater Missouri Operations Company for)	Tariff Nos. YE-2011-0606
Approval to Make Certain Changes in its)	and YE-2011-0607
Charges for Electric Service.)	

STAFF RECOMMENDATION TO APPROVE TARIFF SHEETS

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its recommendation to approve tariff sheets states:

1. On May 27, 2011, the Commission issued its *Order of Clarification and Modification* with which it approved the *Second Nonunanimous Stipulation and Agreement Regarding Pensions and Other Post-Employment Benefits*, and clarified and modified its May 4, 2011 *Report and Order*.

2. With its May 27th Order the Commission corrected the number of months of depreciation of the Crossroads generating facility to be used in rate base to 29 months, clarified that Staff’s model is to be used for determining fuel costs, clarified that energy production-related costs such as fly ash and start up fuel costs Staff omitted when determining cost of service were to be included in the cost of service of KCP&L Greater Missouri Operations Company (“GMO”) upon which rates are set, and modified its *Report and Order* to include a phase-in of the rate increase in the L&P rate district. The Commission ordered that rates be phased-in over two years, and that GMO’s rates initially be set based on its request for the L&P district of \$22.1 million and that it recover during the phase-in period, in two equal parts, the revenues it would have been allowed absent the phase-in of rates plus carrying costs. The Commission also ordered GMO to file fuel adjustment clause tariff sheets bearing effective

dates of July 1, 2011 to modify its fuel adjustment clause.

3. Because of the correction, clarification and modifications in its May 27th Order, the Commission rejected the tariff sheets GMO filed on May 12, 2011, to comply with the Commission's *Report and Order*.

4. In response to the Commission's May 27th Order GMO filed groups of tariff sheets under different tracking numbers as described in the table following:

Tariff Tracking Number	Proposed Effective Date of Tariff Sheets	Description
YE-2011-0606	June 4, 2011	Initial general rate increase and rules changes
YE-2011-0607	July 1, 2011	Fuel Adjustment Clause
YE-2011-0608	June 4, 2012	1 st Phase-in rate change (L&P)
YE-2011-0609	June 4, 2013	2 nd Phase-in rate change (L&P)
YE-2011-0610	June 4, 2014	3 rd Phase-in rate change (L&P)

5. In the attached Memorandum (Appendix A), the Staff recommends that the Commission issue an Order that approves the following proposed initial general rate increase and rules changes tariff sheets (Tracking No. YE-2011-0606), as filed on May 31, 2011, and substituted on June 1, 2011, to wit:

P.S.C. MO. No. 1 (Table of Contents)

7th Revised Sheet No. 2 Canceling 6th Revised Sheet No. 2

P.S.C. MO. No. 1 (Rates – L&P)

4th Revised Sheet No. 18 Canceling 3rd Revised Sheet No. 18
 4th Revised Sheet No. 19 Canceling 3rd Revised Sheet No. 19
 4th Revised Sheet No. 21 Canceling 3rd Revised Sheet No. 21
 4th Revised Sheet No. 22 Canceling 3rd Revised Sheet No. 22
 4th Revised Sheet No. 23 Canceling 3rd Revised Sheet No. 23
 4th Revised Sheet No. 24 Canceling 3rd Revised Sheet No. 24
 4th Revised Sheet No. 25 Canceling 3rd Revised Sheet No. 25
 4th Revised Sheet No. 28 Canceling 3rd Revised Sheet No. 28
 4th Revised Sheet No. 29 Canceling 3rd Revised Sheet No. 29
 4th Revised Sheet No. 31 Canceling 3rd Revised Sheet No. 31

4 th	Revised Sheet No. 34 Canceling 3 rd	Revised Sheet No. 34
4 th	Revised Sheet No. 35 Canceling 3 rd	Revised Sheet No. 35
4 th	Revised Sheet No. 41 Canceling 3 rd	Revised Sheet No. 41
4 th	Revised Sheet No. 42 Canceling 3 rd	Revised Sheet No. 42
4 th	Revised Sheet No. 43 Canceling 3 rd	Revised Sheet No. 43
4 th	Revised Sheet No. 44 Canceling 3 rd	Revised Sheet No. 44
4 th	Revised Sheet No. 47 Canceling 3 rd	Revised Sheet No. 47
4 th	Revised Sheet No. 48 Canceling 3 rd	Revised Sheet No. 48
4 th	Revised Sheet No. 50 Canceling 3 rd	Revised Sheet No. 50

P.S.C. MO. No. 1 (Rates – MPS)

4 th	Revised Sheet No. 51 Canceling 3 rd	Revised Sheet No. 51
4 th	Revised Sheet No. 52 Canceling 3 rd	Revised Sheet No. 52
4 th	Revised Sheet No. 53 Canceling 3 rd	Revised Sheet No. 53
4 th	Revised Sheet No. 54 Canceling 3 rd	Revised Sheet No. 54
4 th	Revised Sheet No. 56 Canceling 3 rd	Revised Sheet No. 56
4 th	Revised Sheet No. 57 Canceling 3 rd	Revised Sheet No. 57
4 th	Revised Sheet No. 59 Canceling 3 rd	Revised Sheet No. 59
4 th	Revised Sheet No. 60 Canceling 3 rd	Revised Sheet No. 60
4 th	Revised Sheet No. 61 Canceling 3 rd	Revised Sheet No. 61
4 th	Revised Sheet No. 66 Canceling 3 rd	Revised Sheet No. 66
4 th	Revised Sheet No. 67 Canceling 3 rd	Revised Sheet No. 67
4 th	Revised Sheet No. 68 Canceling 3 rd	Revised Sheet No. 68
4 th	Revised Sheet No. 70 Canceling 3 rd	Revised Sheet No. 70
4 th	Revised Sheet No. 71 Canceling 3 rd	Revised Sheet No. 71
4 th	Revised Sheet No. 74 Canceling 3 rd	Revised Sheet No. 74
4 th	Revised Sheet No. 76 Canceling 3 rd	Revised Sheet No. 76
4 th	Revised Sheet No. 79 Canceling 3 rd	Revised Sheet No. 79
4 th	Revised Sheet No. 80 Canceling 3 rd	Revised Sheet No. 80
5 th	Revised Sheet No. 88 Canceling 4 th	Revised Sheet No. 88
5 th	Revised Sheet No. 89 Canceling 4 th	Revised Sheet No. 89
4 th	Revised Sheet No. 90 Canceling 3 rd	Revised Sheet No. 90
5 th	Revised Sheet No. 91 Canceling 4 th	Revised Sheet No. 91
5 th	Revised Sheet No. 92 Canceling 4 th	Revised Sheet No. 92
3 rd	Revised Sheet No. 93 Canceling 2 nd	Revised Sheet No. 93
5 th	Revised Sheet No. 95 Canceling 4 th	Revised Sheet No. 95

P.S.C. MO. No. 1 (Rates – L&P and MPS)

4 th	Revised Sheet No. 103	Canceling 3 rd	Revised Sheet No. 103
4 th	Revised Sheet No. 104	Canceling 3 rd	Revised Sheet No. 104
	Original Sheet No. 133		

P.S.C. MO. No. 1 (Rules – L&P and MPS)

1 st	Revised Sheet No. R-1	Canceling	Original Sheet No. R-1
	Original Sheet No. R-5.01		
1 st	Revised Sheet No. R-20	Canceling	Original Sheet No. R-20

1 st	Revised Sheet No. R-27	Canceling	Original Sheet No. R-27
1 st	Revised Sheet No. R-34	Canceling	Original Sheet No. R-34
2 nd	Revised Sheet No. R-66	Canceling	1 st Revised Sheet No. R-66

and makes them effective on June 4, 2011, as the Commission ordered in its May 27, 2011 *Order of Clarification and Modification* for good cause as authorized by section 393.140(11), RSMo., and that approves the following proposed fuel adjustment clause tariff sheets (Tracking No. YE-2011-0607), as filed on May 31, 2011, and substituted on June 1, 2011, to wit:

P.S.C. MO. No. 1, filed effective July 1, 2011

1 st	Revised Sheet No. 127.1	Canceling	Original Sheet No. 127.1
1 st	Revised Sheet No. 127.2	Canceling	Original Sheet No. 127.2
1 st	Revised Sheet No. 127.3	Canceling	Original Sheet No. 127.3
1 st	Revised Sheet No. 127.4	Canceling	Original Sheet No. 127.4
4 th	Revised Sheet No. 127.5	Canceling	3 rd Revised Sheet No. 127.5
	Original Sheet No. 127.6		
	Original Sheet No. 127.7		
	Original Sheet No. 127.8		
	Original Sheet No. 127.9		
	Original Sheet No. 127.10		

and makes them effective July 1, 2011, as the Commission ordered in its May 27, 2011 *Order of Clarification and Modification* for good cause as authorized by section 393.140(11), RSMo..

6. GMO also filed tariff sheets designed to implement the ordered phase-in of the L&P rate district's revenue increase that have effective dates of June 4, 2012 (Tracking No. YE-2011-0608), June 4, 2013 (Tracking No. YE-2011-0609), and June 4, 2014 (Tracking No. YE-2011-0610). Staff has reviewed the Company's proposed revenue increases/decreases for these out-year revenue requirements as contained in its transmittal letter to the Commission's Secretary, and determined they satisfy the Commission's May 27th Order. Staff is still reviewing these tariff sheets to determine if the individual billing rates will generate those future revenue requirements, and Staff will make its recommendation to the Commission for these tariff sheets as soon as practicable.

7. As stated in its Memorandum, Staff has verified that GMO has filed its 2010

annual report and is not delinquent on its assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, the Staff recommends that the Commission issue an order that approves the proposed tariff sheets specifically identified above and makes them effective, for good cause, on June 4, 2011, and July 1, 2011, respectively.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
Deputy Counsel
Missouri Bar No. 35512

Attorney for the Staff of the
Missouri Public Service Commission
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 2nd day of June 2011.

/s/ Nathan Williams

M E M O R A N D U M

TO: Missouri Public Service Commission Official Case File
File No. ER-2010-0356
Tariff Tracking Nos. YE-2011-0606 and YE-2011-0607
KCP&L Greater Missouri Operations Company

FROM: John Rogers, Utility Regulatory Manager
Mike Scheperle, Manager, Economic Analysis
Mack McDuffey, Rate & Tariff Examiner II

/s/ Curt Wells 6/2/11
Co-Case Coordinator / Date

/s/ Nathan Williams 6/2/11
Staff Counsel Division / Date

SUBJECT: Staff Recommendation For **Approval** Of Tariff Sheets Filed To Comply With The Commission's May 4, 2011 Report And Order as revised by its May 27, 2011, Order of Clarification and Modification. This recommendation does not include the tariff sheets designed to phase-in general rates on June 4 of 2012, 2013, and 2014.

DATE: June 1, 2011

On Tuesday, May 31, 2011, KCP&L Greater Missouri Operations Company ("GMO") filed with the Commission forty-eight (48) rates tariff sheets and six (6) rules and regulations tariff sheets each bearing an issue date of May 31, 2011, and a proposed effective date of June 4, 2011, and ten (10) Fuel Adjustment Clause tariff sheets with an issue date of May 31, 2011, and a proposed effective date of July 1, 2011. GMO also filed tariff sheets for the L&P rate district with issue dates of May 31, 2011, and effective dates of June 4 of 2012, 2013, and 2014. GMO has asserted all these tariff sheets comply with the Commission's May 4, 2011 Report and Order as revised by its May 27, 2011, Order of Clarification and Modification. The tariff tracking numbers and proposed effective dates and a brief description of each tariff filing are presented in the table that follows:

Tariff Tracking Number	Proposed Effective Date of Tariff Sheets	Description
YE-2011-0606	June 4, 2011	Initial general rate increase and rules changes
YE-2011-0607	July 1, 2011	Fuel Adjustment Clause
YE-2011-0608	June 4, 2012	1 st Phase-in rate change (L&P)
YE-2011-0609	June 4, 2013	2 nd Phase-in rate change (L&P)
YE-2011-0610	June 4, 2014	3 rd Phase-in rate change (L&P)

This recommendation is limited to the initial general rate increase and rules change tariff sheets with a proposed effective date of June 4, 2011 (YE-2011-0606) and the fuel adjustment clause tariff sheets with a proposed effective date of July 1, 2011 (YE-2011-0607). On June 1, 2011, GMO filed three (3) substitute tariff sheets in YE-2011-0607 and filed one (1) substitute tariff sheet in YE-2011-0606 to correct typographical errors as requested by the Staff.

These tariff sheets are designed to comply with Ordered Paragraph 1 of the Commission's May 4, 2011 Report and Order as revised by the Commission's May 27th Order of Clarification and Modification. Ordered Paragraph 1 of the Report and Order states:

1. The seven Nonunanimous Stipulations and Agreements referenced in this Report and Order are approved, and the signatories thereto are ordered to comply with those Nonunanimous Stipulations and Agreements.

Ordered Paragraphs 1, 2, 8, 10, 11, 12 and 13 of the May 27th Order of Clarification and Modification state:

1. The Second Nonunanimous Stipulation and Agreement Regarding Pensions and Other Post-Employment Benefits is approved. The signatories of that agreement are ordered to comply with its terms.

2. The Motion for Clarification filed by Ag Processing, Inc. a cooperative, and the Sedalia Industrial Energy Users' Association and similar request made by KCP&L Greater Missouri Operations Company to correct the number of months of depreciation for the Crossroads facility is granted. Page 100 of the Report and Order is corrected to read:

Given the subsequent 29 months through the ordered true-up date, the fair market value of Crossroads for purposes of establishing rate base in this case should also reflect 29 months of depreciation on that unit.

8. With regard to the allocation of Iatan 2 between the MPS and L&P service areas, the Report and Order is modified as stated in the body of this order.

10. The fuel adjustment clause (FAC) tariff sheets, Tariff No. YE-2011-0577, are rejected, and KCP&L Greater Missouri Operations Company is authorized to refile those tariff sheets in compliance with this order including an effective date of July 1, 2011.

11. The remaining compliance tariff sheets, Tariff No. YE-2011-0567, are rejected and KCP&L Greater Missouri Operations Company is authorized to refile those tariff sheets in compliance with this order and may file those tariff sheets with an effective date of June 4, 2011, without the need for filing an additional motion for expedited treatment.

12. KCP&L Greater Missouri Operations Company shall file any revisions necessary to comply with the correction and clarifications set out in this order no later than May 31, 2011, at 1:00 p.m.

13. Any objections to the compliance tariffs containing a June 4, 2011 tariff effective date shall be filed no later than June 2, 2011, at 9:00 a.m.

Revenue Requirement and Rate Design

The total revenue requirement increase for GMO is \$65,494,168 or 10.25% (L&P is \$29,772,796 or 21.3% and MPS is \$35,721,372 or 7.15%). However, the Commission, in its May 27th Order of Clarification and Modification, determined that the increase to customers in the L&P rate district reflected in the initial general rate increase and rules change tariff sheets should not exceed the Company's requested amount of \$22,101,088 (15.8%), and that the additional revenue requirement should be phased-in in equal parts over two years. Therefore, the total increase for GMO under the tariff sheets filed in YE-2011-0606 is \$57,822,460 (9.0%).

Low-Income Weatherization

The Commission determined that GMO shall continue its low-income weatherization program at its present level of funding; continue working with local community action agencies; and evaluate transition of the funds to the Environmental Improvement and Energy Resources Authority (EI ERA) and administration of the program to the Department of Natural Resources (DNR) and present that evaluation to the Greater Missouri Operations Advisory Group (GMOAG) for consideration.

Fuel Adjustment Clause

In its May 4, 2011 Report and Order in a section headed **Decision – FAC Other Issues** that starts on page 219 of the Report and Order, the Commission stated:

The Commission did not find in favor of Staff's prudence disallowance and imputed costs for two additional turbines at South Harper. Therefore, the Commission will not add the Crossroads Generating Station Factor in the FAC.

GMO's FAC shall be modified so that the factor RNSI (forecasted retail net system input) is redefined to clarify that it is based on net system input *at the generator* as set out in Exhibit GMO 211, Staff Rate Design and Class Cost-of-Service Report, at page 33, Schedule JAR-2-16.

GMO's FAC shall be modified to clarify that only sales to Missouri municipalities are excluded from off-system sales revenues (GMO FAC factor "OSSR") as set out in Exhibit GMO 241, Surrebuttal Testimony of John Rogers, Schedule JAR-2-15 Revised.

GMO's FAC tariff sheets shall be modified to clarify and improve them as shown in the example tariff sheets attached to Staff's Rate Design and Class Cost-of-Service Report, as revised in schedules attached to the Surrebuttal Testimony of John A. Rogers to the extent that Staff's proposed changes match changes proposed by GMO in the Direct Testimony of Tim M. Rush.

The Commission determines that transmission costs for OSS are appropriately included in the FAC under the Commission's rule 4 CSR 240-20.090(1)(B). All other transmission costs are not appropriate and shall not be included. In addition, because the Commission has determined that transmission costs from the Crossroads facility shall not be borne by the ratepayers, those costs shall also be excluded from the FAC mechanism.

Staff Recommendation

The Staff has reviewed the initial general rate increase and rules change tariff sheets (YE-2011-0606) filed on May 31, 2011, as substituted on June 1, 2011, and is of the opinion that they are in compliance with the Commission's Report and Order as revised by its Order of Clarification and Modification. Staff therefore recommends that the Commission issue an Order approving the following proposed tariff sheets, as filed on May 31, 2011, and substituted on June 1, 2011, to become effective on June 4, 2011, with less than 30 days' notice for good cause shown pursuant to Section 393.140(11) RSMo 2000, as the Commission found in its May 27th Order of Clarification and Modification and directed the Company:

P.S.C. MO. No. 1 (Table of Contents)

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P.S.C. MO. No. 1 (Rates – L&P)

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P.S.C. MO. No. 1 (Rates – MPS)

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5 th	Revised Sheet No. 88	Canceling 4 th	Revised Sheet No. 88
5 th	Revised Sheet No. 89	Canceling 4 th	Revised Sheet No. 89
4 th	Revised Sheet No. 90	Canceling 3 rd	Revised Sheet No. 90
5 th	Revised Sheet No. 91	Canceling 4 th	Revised Sheet No. 91
5 th	Revised Sheet No. 92	Canceling 4 th	Revised Sheet No. 92
3 rd	Revised Sheet No. 93	Canceling 2 nd	Revised Sheet No. 93
5 th	Revised Sheet No. 95	Canceling 4 th	Revised Sheet No. 95

P.S.C. MO. No. 1 (Rates – L&P and MPS)

4 th	Revised Sheet No. 103	Canceling 3 rd	Revised Sheet No. 103
4 th	Revised Sheet No. 104	Canceling 3 rd	Revised Sheet No. 104
	Original Sheet No. 133		

P.S.C. MO. No. 1 (Rules – L&P and MPS)

1 st	Revised Sheet No. R-1	Canceling	Original Sheet No. R-1
	Original Sheet No. R-5.01		
1 st	Revised Sheet No. R-20	Canceling	Original Sheet No. R-20
1 st	Revised Sheet No. R-27	Canceling	Original Sheet No. R-27
1 st	Revised Sheet No. R-34	Canceling	Original Sheet No. R-34
2 nd	Revised Sheet No. R-66	Canceling 1 st	Revised Sheet No. R-66

Staff also recommends that the Commission, in the same Order with which it approves the foregoing proposed tariff sheets, also approve the following proposed fuel adjustment clause tariff sheets, as filed on May 31, 2011, and substituted on June 1, 2011, to become effective on July 1, 2011, as ordered by the Commission:

P.S.C. MO. No. 1, filed effective July 1, 2011

1 st	Revised Sheet No. 127.1	Canceling	Original Sheet No. 127.1
1 st	Revised Sheet No. 127.2	Canceling	Original Sheet No. 127.2
1 st	Revised Sheet No. 127.3	Canceling	Original Sheet No. 127.3
1 st	Revised Sheet No. 127.4	Canceling	Original Sheet No. 127.4
4 th	Revised Sheet No. 127.5	Canceling 3 rd	Revised Sheet No. 127.5
	Original Sheet No. 127.6		
	Original Sheet No. 127.7		
	Original Sheet No. 127.8		
	Original Sheet No. 127.9		
	Original Sheet No. 127.10		

The Company has submitted tariff sheets designed to implement the ordered phase-in of the L&P rate district's revenue increase that have effective dates of June 4, 2012, June 4, 2013, and June 4, 2014. Staff has reviewed the Company's proposed revenue increases/decreases for these

revenue requirements as contained in its transmittal letter to the Commission's Secretary, and has determined they will satisfy the Commission's Order. Staff is reviewing the individual tariff sheets to determine if they comply with the Commission's Order, and Staff will provide the Commission with Staff's recommendation on these tariff sheets as soon as practicable.

Staff has verified that GMO has filed its 2010 annual report and is not delinquent on its assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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

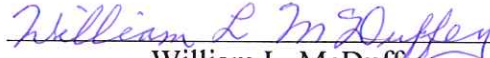
In the Matter of the Application of)
KCP&L Greater Missouri Operations)
Company for Approval to Make Certain)
Changes in its Charges for Electric)
Service)

Case No. ER-2010-0356
File Nos. YE-2011-0606 and
YE-2011-0607

AFFIDAVIT OF WILLIAM L. MCDUFFEY

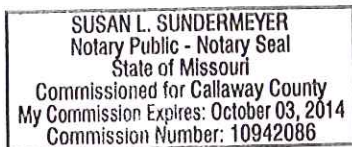
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

William L. McDuffey, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was given by him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



William L. McDuffey

Subscribed and sworn to before me this 2nd day of June, 2011.





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-2010-0356
File Nos. YE-2011-0606 and
YE-2011-0607

AFFIDAVIT OF JOHN A. ROGERS

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

John A. Rogers, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was given by him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



John A. Rogers

Subscribed and sworn to before me this 2nd day of June, 2011.



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-2010-0356
File Nos. YE-2011-0606 and
YE-2011-0607

AFFIDAVIT OF MICHAEL S. SCHEPERLE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Michael S. Scheperle, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was given by him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Michael S. Scheperle

Subscribed and sworn to before me this 2nd day of June, 2011.





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-2010-0356
File Nos. YE-2011-0606 and
YE-2011-0607

AFFIDAVIT OF CURT WELLS

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Curt Wells, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was given by him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Curt Wells

Subscribed and sworn to before me this 2nd day of June, 2011.





Notary Public