

**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 a General Rate Increase for Electric Service.)	Case No. ER-2012-0175
)	

**REPLY TO PUBLIC COUNSEL'S RESPONSE
TO THE COMPANIES' MOTION TO STRIKE
TRUE-UP DIRECT TESTIMONY OF MICHAEL P. GORMAN**

Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") (collectively, "Companies") state the following brief reply to the Response of the Office of the Public Counsel ("OPC") to the Companies' Motion to Strike the True-up Direct Testimony of Mr. Gorman ("Motion to Strike"):

1. In OPC's Response at Paragraph 7, it quotes a passage from the Companies' Motion to Strike (Paragraph 9) in an effort to argue that Mr. Gorman is providing "more timely and accurate figures that were not available during the case-in-chief."

2. What the Companies stated in Paragraph 9 was that the purpose of true-up testimony and the true-up hearing is to present and review more timely and accurate information. It did not intend to suggest that Mr. Gorman's True-Up Direct Testimony met this requirement. To the contrary, Mr. Gorman clearly does not offer more timely, more accurate or otherwise trued-up figures or data.

3. Proof of the fact that Mr. Gorman does not provide new or more accurate information in his true-up testimony is found on pages 3 and 4, where he quotes figures contained in his surrebuttal testimony filed in early October regarding the Companies' debt maturities and issuances. Compare Gorman True-Up Direct at 3:23 - 4:5 with Gorman

Surrebuttal at 3:5-8. The figures cited in the True-Up Direct Testimony are the same figures he cited in his surrebuttal. He provides no new information that was not available during the case-in-chief.

4. Mr. Gorman then makes certain assumptions and arguments that lead to his proposal to make an arbitrary adjustment to the Companies' capital structure. See Gorman True-Up Direct Testimony at 5. None of the information quoted on page 5 of Mr. Gorman's True-Up Direct Testimony contains updated information, more accurate information, or other data what was not available during the case-in-chief.

5. Because OPC has provided no new information, and does not dispute the definitions or case law authority that the Companies cite in their Motion to Strike, Mr. Gorman's True-Up Direct Testimony is improper under 4 CSR 240-2.130(10), and is simply an effort to provide supplemental argument and testimony to the Commission disguised as true-up testimony.

WHEREFORE, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company request that their Motion to Strike be granted.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing was served upon counsel of record on this 16th day of November, 2012.

/s/ Karl Zobrist
Attorney for Kansas City Power & Light
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