

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

In the Matter of the Application of Kansas City )  
Power & Light Company for Approval to )  
Make Certain Changes in its Charges for )  
Electric Service to Implement its Regulatory )  
Plan. )

**File No. ER-2012-0174**  
Tariff No YE-2012-0404

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. )

**File No. ER-2012-0175**  
Tariff No. YE-2012-0405

**CITY OF KANSAS CITY'S  
STATEMENT OF POSITION**

Comes now the City of Kansas City (the City), by and through counsel, and submits this statement of position on the list of issues to be filed by the parties in this case on October 11, 2012:

**KCP&L Only Issues**

**ISSUE 10.<sup>1</sup> Charles B. Wheeler Airport and Kansas City Water Department:**

- a. What actions has KCPL taken, or what actions should KCPL be taking, to address the quality and reliability of service at Charles B. Wheeler Airport (Downtown Airport)**
  - i. Should the Commission order KCPL to conduct an investigation into the cause of power fluctuations and interruptions at Downtown Airport.**

Downtown Airport has experienced multiple incidents of power fluctuation in addition to power interruptions of a momentary or sustained duration, and both undervoltage (brownout) and

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<sup>1</sup> At the time this position statement was prepared the form of the list of issues was not available. The issue numbers used in this position statement are derived from the current draft of the list of issues circulated by the Commission staff, and may be subject to change.

overvoltage situations. Some power interruptions are momentary such that they disable computers and electronic equipment. Other interruptions have lasted several hours. The City is aware that KCPL is undertaking a voluntary investigation of the causes of these quality of service problems. It is the City's position that an order of the Commission should be entered with clear direction to KCPL to find the root of these problems and restore reliable and adequate service to the facility.

**b. What actions has KCPL taken, or what actions should KCPL be taking, to address the quality and reliability of service at pumping stations and other installations operated and managed by the Kansas City Water Department.**

Much like Downtown Airport, facilities operated by the City Water Department have experienced repeated voltage fluctuations and power interruptions. These facilities demand steady current at high voltages and if power varies or is interrupted there is a direct adverse consequence to the provision of water services to City residents. Although a KCPL investigation and study is now underway, the City recommends that KCPL 1) exclusively dedicate more feed lines to water services facilities; 2) move to underground more of KCPL's serving overhead lines; 3) provide contingent power supplies, such as optional feeder lines that could be switched over; and 4) install anti-surge or anti-power fluctuation devices.

**KCP&L – GMO Common Issues**

**ISSUE 14. Low Income Weatherization:**

- a. At what level should low-income weatherization be funded and included in revenue requirement?**
- b. Are the Companies distributing to agencies the weatherization funds collected from their ratepayers? If not, why not?**
- c. Should any weatherization funds which are collected during a year (plus any interest or return earned thereon) which are not distributed be available for distribution in subsequent years?**

- d. Should the Companies consult the DSM Advisory Group (“DSMAG”) on the allocation and distribution of funds?**
- e. Should the Companies provide quarterly reports to the DSMAG on the allocation and distribution of funds?**
- f. Should the Companies file revised tariff sheets regarding their low-income weatherization program?**

In the past three years the City’s Low Income Weatherization Assistance Program (LIWAP) completed over 2,000 weatherization projects relying extensively upon funding from The American Recovery and Reinvestment Act of 2009 (ARRA). There is still a waiting list for assistance and ARRA funds are diminishing. ARRA funds will be insufficient to meet demand. The City recommends that KCPL’s allocation of LIWAP funding be increased as set out in testimony.

Regarding the other subissues, the City endorses the recommendations made by Dr. Henry Warren and Dr. Adam Bickford, witnesses for the Staff and Missouri Department of Natural Resources, respectively.

The City further recommends that to facilitate entry into the LIWAP program, KCPL (and affiliated companies) should establish a web based client approval system which would allow weatherization providers to quickly confirm that weatherization clients are eligible.

### **GMO Only Issues**

#### **ISSUE 16. Kansas City International Airport**

- a. What actions has GMO taken to date to address quality and reliability of service at Kansas City International Airport (KCI)?**
- b. What actions should GMO be taking to address the quality and reliability of service at KCI in anticipation of changes in the layout of the airport terminals?**

Although quality of electric service at KCI is relatively adequate and reliable, the electric infrastructure includes facilities that have exceeded, or soon will exceed, their useful life. The City recommends that GMO evaluate and review the facilities in service at KCI to determine their remaining usefulness, and implement a prompt upgrade or replacement policy. Additionally, GMO should begin a process, in concert with the City, to plan for changes in demand or energy requirements that are due to the expected modifications to KCI's terminal configuration.

Kansas City takes no position on the other issues set out by the parties without impairment of its right to brief and argue those issues to the Commission as the evidence may unfold at hearing.

Respectfully submitted,

/s/ Mark W. Comley

Mark W. Comley #28847  
NEWMAN, COMLEY & RUTH P.C.  
601 Monroe Street, Suite 301  
P.O. Box 537  
Jefferson City, MO 65102-0537  
(573) 634-2266  
(573) 636-3306 (FAX)

Attorneys for City of Kansas City, Missouri

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 11<sup>th</sup> day of October, 2012, to all parties of record

/s/ Mark W. Comley