

Exhibit No.:
Issue: Fuel Adjustment Clause
Witness: Lisa A. Starkebaum
Type of Exhibit: Direct Testimony
Sponsoring Party: KCP&L Greater Missouri Operations Company
Case No.: ER-2019-0414
Date Testimony Prepared: June 28, 2019

MISSOURI PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

LISA A. STARKEBAUM

DIRECT TESTIMONY

OF

LISA A. STARKEBAUM

Case No. ER-2019-0414

1 **Q: Please state your name and business address.**

2 A: My name is Lisa A. Starkebaum. My business address is 1200 Main, Kansas
3 City, Missouri 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Kansas City Power & Light Company (“KCP&L”) as Manager
6 - Regulatory Affairs.

7 **Q: What are your responsibilities?**

8 A: My responsibilities include the coordination, preparation and review of financial
9 information and schedules associated with the Company’s compliance filings for
10 Westar, KCP&L and KCP&L Greater Missouri Operations Company
11 (“Company” or “GMO”).

12 **Q: Please describe your education.**

13 A: In 1994, I received a Bachelor of Science Degree in Finance from Northwest
14 Missouri State University in Maryville, Missouri.

15 **Q: Please provide your work experience.**

16 A: In 1995, I joined Cerner Corporation as an Accountant in the Finance Department
17 assisting with month-end close and reporting responsibilities. In 1997, I joined
18 Aquila, Inc. (“Aquila”) where I worked in the Financial and Regulatory Reporting
19 group as an Accountant, until joining Regulatory Accounting Services as a

1 Regulatory Analyst in 1999. I was employed by Aquila for a total of 11 years
2 prior to beginning my employment with KCP&L in July 2008 as a part of the
3 acquisition of Aquila, Inc., by Great Plains Energy Incorporated. Since that time,
4 I have held various positions with increasing responsibilities within Regulatory
5 Accounting Services and Regulatory Affairs. As a Lead Analyst in the
6 Regulatory Affairs department, my main areas of responsibility included the
7 preparation of FERC and jurisdictional reporting, and the preparation of rate cases
8 and rate case support for both KCP&L and GMO. In December 2015, I became a
9 Supervisor, Regulatory Affairs responsible for overseeing a team dedicated to
10 compliance reporting and was later promoted to Manager, Regulatory Affairs
11 effective June 2018. In my current position, I am responsible for overseeing
12 various reporting requirements to ensure Westar, KCP&L, and GMO are
13 compliant with its jurisdictional rules and regulations, in addition to the
14 implementation of new reporting or commitments resulting from various rate case
15 orders and other regulatory filings. In addition, I oversee the coordination, review
16 and filing of the various rider mechanisms utilized by Westar, KCP&L, and
17 GMO.

18 **Q: Have you previously testified in a proceeding before the Missouri Public**
19 **Service Commission (“MPSC” or “Commission”) or before any other utility**
20 **regulatory agency?**

21 A: Yes, I have testified before the MPSC, the Kansas Corporation Commission
22 (“KCC” or “Commission”), and have provided written testimony before the
23 Public Utilities Commission of Colorado. I have sponsored testimony in Missouri

1 related to various tariff filings involving rider mechanisms utilized by the
2 Company. In addition, I have worked closely with both MPSC and KCC Staff on
3 numerous filings and rate case matters.

4 **Q: What is the purpose of your testimony?**

5 A: The purpose of my testimony is to support the 21st true-up filing being made by
6 GMO under the provisions in 4 CSR 240-20.090(9) and the Company's approved
7 fuel and purchased power cost recovery mechanism or FAC.

8 **Q: What is the purpose of the true-up filing?**

9 A: GMO's FAC tariff requires a true-up filing by the filing date of its Fuel
10 Adjustment Rate ("FAR") filing following the completion of each recovery
11 period. Per the tariff, the true-up amount shall be the difference between the
12 revenues billed and the revenues authorized for collection during the recovery
13 period as well as any corrections identified to be included in the current FAR
14 filing. The purpose of this true-up filing is to identify the amount over or under-
15 recovered from the 21st 12-month recovery period.

16 **Q: Please explain the FAC process, including the accumulation, filing, recovery**
17 **and true-up periods.**

18 A: Each FAC begins with an accumulation period which covers a six-month period
19 in which the costs of the fuel and purchased power components net of off system
20 sales revenues contained in the FAC are accumulated and compared to the base
21 energy costs that are in rates over that same time frame. The net of the costs
22 compared to the base energy costs in current rates is the amount to be recovered
23 or returned to customers over the recovery period. After the accumulation period,

1 GMO files with the Commission the Fuel Adjustment Rate (“FAR”). The FAR is
2 the rate that will be charged to customers over the recovery period. The time
3 between the accumulation period and the beginning of the recovery period is three
4 months. The recovery period for GMO is 12 months. After the recovery period, a
5 true-up is filed which reflects all the activities and summarizes the balances of the
6 FAC. The balances will then be included in the next FAR filing.

7 **Q: What was the timing of the accumulation and recovery relating to this true-**
8 **up?**

9 A: The 21st accumulation period consists of six months of fuel and purchased power
10 expenses net of off system sales revenues, or June 2017 through November 2017.
11 The recovery period for this accumulation was March 2018 through February
12 2019.

13 **Q: Why would there be a difference between the accumulated over or under-**
14 **recovery and the amount billed during the recovery period?**

15 A: The FAR is calculated based upon projected kWh sales for the recovery period.
16 Since the FAR is based on a projected number, once actual sales are recorded, a
17 difference exists between the estimate and the actual kWh billed. This difference
18 will be “trued-up” in the next FAC filing.

19 **Q: What was the difference between what was accumulated, along with interest,**
20 **and the amount billed through the recovery mechanism?**

21 A: For this 21st accumulation period, the GMO FAC was over-collected by \$197,557.

22 **Q: What impact will this have on future FAC adjustment rate schedules filed?**

1 A: The proposed true-up amount in this filing will be included in the next semi-
2 annual FAC rate schedule filing that is being made concurrent with this true-up
3 filing. The Company's 21st FAC recovery period ended February 2019;
4 therefore, the over-recovery of \$197,557 will be included in the 24th
5 accumulation period semi-annual filing to be made on June 28, 2019 covering the
6 accumulation period of December 2018 through May 2019.

7 **Q: How did you develop the proposed true-up amount that is being requested in**
8 **this filing?**

9 A: As indicated above, the true-up amount is the net of the accumulated expenditures
10 over or under the base FAC costs as set in rates during the accumulation period
11 plus interest and any adjustments, and the amount billed during the recovery
12 period. The details associated with this calculation are filed along with this
13 testimony in Schedule LAS-1. This schedule contains a summary and all
14 supporting work papers for the calculation.

15 **Q: Is there anything additional impacting this true-up filing that should be**
16 **mentioned?**

17 A: Yes, the presentation of materials and supporting documentation provided in this
18 semi-annual FAC filing has been updated to comply with the Final Order of
19 Rulemaking to amend 4 CSR 240-20.090 Fuel and Purchased Power Rate
20 Adjustment Mechanism that became effective on January 30, 2019. This true-up
21 filing follows the guidelines for True-Ups of RAMs as provided in 4 CSR 240-
22 20.090(9).

1 **Q: What action is the Company requesting from the Commission with respect to**
2 **this true-up filing?**

3 A: As provided by 4 C.S.R. 240-20.090, a true-up filing is required at least annually.
4 Pursuant to the Company's FAC tariff, the amount of the true-up will be included
5 in the next accumulation period. The Company requests that the Commission
6 approve the amount to be included in the 24th accumulation period which will
7 cover the six months ended May 2019.

8 **Q: Does this conclude your testimony?**

9 A: Yes, it does.

**Information Required By
4 CSR 240-20.090 (9)
True-Ups of RAMs**

KCP&L Greater Missouri Operations Company

9 (A) 2.A - Any revision to the calculation of the net base energy cost

None





KCP&L Greater Missouri Operations Company

9 (A) 2.B - Any other proposed adjustments or refunds not related to the calculation of the net base energy cost

None

KCP&L Greater Missouri Operations Company

9 (A) 2.C - Calculation of the monthly amount
that was over-billed or under-billed through
its RAM

	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18
			21st Accumulation period						Filing and Approval			
21st Accumulation	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18
(Over)/Under Adjustment from 18th Accum			(546,582.91)									
C/M (Over)/Under Accrued	1,309,249.69	3,562,848.60	1,350,869.89	1,459,664.04	137,376.82	973,157.00				646,169.83	655,712.31	611,939.63
C/M (Over)/Under Recovery	-	-	-	-	-	-				7,669,228	7,013,516	6,401,576
CUMM (Over)/Under Balance	1,309,250	4,872,098	5,676,385	7,136,049	7,273,426	8,246,583	8,315,398	8,315,398	8,315,398			
Monthly Short Term Debt Rate rate	0.20%	0.21%	0.21%	0.21%	0.21%	0.21%						
C/M Accrued interest (P/M Bal)	(3,442.34)	1,714.12	12,061.16	17,873.78	20,276.50	20,331.90						
CUMM Accrued Interest Balance	(3,442)	(1,728)	10,333	28,207	48,483	68,815						
									22nd Accumulation period			
22nd Accumulation							Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18
(Over)/Under Adjustment from 19th Accum									136,956.99			
C/M (Over)/Under Accrued							1,894,246.88	3,753,713.17	1,287,281.40	957,373.18	2,466,342.34	649,398.06
C/M (Over)/Under Recovery							-	-	-	-	-	-
CUMM (Over)/Under Balance							1,894,247	5,647,960	7,072,198	8,029,572	10,495,914	11,145,312
Monthly Short Term Debt Rate rate							0.23%	0.23%	0.24%	0.25%	0.26%	0.27%
C/M Accrued interest (P/M Bal)							23,553.38	28,091.38	36,512.11	41,561.80	43,342.90	48,448.47
CUMM Accrued Interest Balance							23,553	51,645	88,157	129,719	173,062	221,510
23rd Accumulation												
(Over)/Under Adjustment from 20th Accum												
C/M (Over)/Under Accrued												
C/M (Over)/Under Recovery												
CUMM (Over)/Under Balance												
Monthly Short Term Debt Rate rate												
C/M Accrued interest (P/M Bal)												
CUMM Accrued Interest Balance												
24th Accumulation												
(Over)/Under Adjustment from 21st Accum												
C/M (Over)/Under Accrued												
C/M (Over)/Under Recovery												
CUMM (Over)/Under Balance												
Monthly Short Term Debt Rate rate												
C/M Accrued interest (P/M Bal)												
CUMM Accrued Interest Balance												

KCP&L Greater Missouri Operations Company

9 (A) 2.C - Calculation of the monthly amount
that was over-billed or under-billed through
its RAM

	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19
21st Accumulation	Jun-18	Jul-18	Recovery Period		Oct-18	Nov-18	Dec-18	Jan-19	Feb-19			
(Over)/Under Adjustment from 18th Accum			Aug-18	Sep-18								
C/M (Over)/Under Accrued												
C/M (Over)/Under Recovery	760,692.16	855,093.61	810,577.18	751,975.39	641,685.15	612,890.19	678,579.44	726,336.59	761,303.62			
CUMM (Over)/Under Balance	5,640,884	4,785,791	3,975,214	3,223,238	2,581,553	1,968,663	1,290,083	563,747	(197,557)			
Monthly Short Term Debt Rate rate												
C/M Accrued interest (P/M Bal)												
CUMM Accrued Interest Balance												
22nd Accumulation	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19
(Over)/Under Adjustment from 19th Accum												
C/M (Over)/Under Accrued												
C/M (Over)/Under Recovery				1,017,429.79	868,217.56	829,254.92	918,121.35	982,746.26	1,030,045.64	969,856.46	766,271.73	790,343.01
CUMM (Over)/Under Balance	11,366,822	11,366,822	11,366,822	10,349,392	9,481,175	8,651,920	7,733,798	6,751,052	5,721,007	4,751,150	3,984,878	3,194,535
Monthly Short Term Debt Rate rate												
C/M Accrued interest (P/M Bal)												
CUMM Accrued Interest Balance												
23rd Accumulation	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19
(Over)/Under Adjustment from 20th Accum			(55,005.47)									
C/M (Over)/Under Accrued	6,609,264.17	5,371,272.67	2,143,448.20	1,285,549.99	4,348,592.70	9,196,452.72						
C/M (Over)/Under Recovery	-	-	-	-	-	-						
CUMM (Over)/Under Balance	6,609,264	11,980,537	14,068,980	15,354,530	19,703,122	28,899,575	29,358,131	29,358,131	29,358,131	2,328,296.51	1,788,344.88	1,800,971.69
Monthly Short Term Debt Rate rate	0.28%	0.28%	0.28%	0.29%	0.30%	0.30%						
C/M Accrued interest (P/M Bal)	49,971.31	66,470.37	78,209.69	84,066.49	85,335.12	94,503.40						
CUMM Accrued Interest Balance	49,971	116,442	194,651	278,718	364,053	458,556						
24th Accumulation							Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19
(Over)/Under Adjustment from 21st Accum									(197,556.82)			
C/M (Over)/Under Accrued							3,437,105.77	2,030,109.46	2,963,285.99	4,535,052.73	1,587,058.03	(97,851.85)
C/M (Over)/Under Recovery							-	-	-	-	-	-
CUMM (Over)/Under Balance							3,437,106	5,467,215	8,232,944	12,767,997	14,355,055	14,257,203
Monthly Short Term Debt Rate rate							0.31%	0.31%	0.31%	0.31%	0.31%	0.31%
C/M Accrued interest (P/M Bal)							121,853.82	131,033.24	131,336.79	134,989.32	138,473.09	134,012.88
CUMM Accrued Interest Balance							121,854	252,887	384,224	519,213	657,686	791,699

9 (A) 2.D (I) - Explanation of how short-term borrowing rate was determined

Interest rates for borrowings under the revolving credit facility for Kansas City Power & Light Company (KCPL) were priced according to the below pricing schedule effective December 17, 2014, the date the credit facility was renegotiated. Specific rates are set based upon the type of borrowing requested (Eurodollar advance or Floating Rate Advance), the credit rating and the term of the borrowing.

Pricing	≥A-/A3 Level I Status	BBB+/Baa1 Level II Status	BBB/Baa2 Level III Status	BBB-/Baa3 Level IV Status	BB+/Ba1 Level V Status	≤BB/Ba2 Level VI Status
<i>Applicable Margin for Eurodollar Advances and Letter of Credit Fee Rate</i>	1.13%	1.25%	1.50%	1.75%	2.00%	2.25%
<i>Commitment Fee Rate</i>	0.13%	0.18%	0.23%	0.28%	0.38%	0.50%
<i>Applicable Margin for Floating Rate Advances</i>	0.13%	0.25%	0.50%	0.75%	1.00%	1.25%

KCPL utilizes a commercial paper program as its primary source of short term funding as opposed to borrowing under its revolving credit facility. KCPL issues commercial paper on virtually a daily basis through three independent dealers and interest rates are determined by the financial markets based upon market rates, KCPL's Commercial Paper rating, the amount of funding requested and the term.

Credit ratings during the review period January 1, 2017 through June 30, 2018 are shown below.

	Q4 2016		Q1 2017		Q2 2017	
	Moody's	Standard & Poors	Moody's	Standard & Poors	Moody's	Standard & Poors
KCPL						
Senior Secured Debt	A2	A	A2	A	A2	A
Commercial Paper	P-2	A-2	P-2	A-2	P-2	A-2

	Q3 2017		Q4 2017		Q1 2018	
	Moody's	Standard & Poors	Moody's	Standard & Poors	Moody's	Standard & Poors
KCPL						
Senior Secured Debt	A2	A	A2	A	A2	A
Commercial Paper	P-2	A-2	P-2	A-2	P-2	A-2

	Q2 2018	
	Moody's	Standard & Poors
KCPL		
Senior Secured Debt	A2	A-
Commercial Paper	P-2	A-2

KCP&L Greater Missouri Operations Company

9 (A) 2.D (II) - Calculation of the short-term borrowing rate

Day	Date	One Month LIBOR	Applicable Margin	Upfront Fees	Daily Rate		
Thursday	June 1, 2017	1.0759%	1.2500%		2.3259%		
Friday	June 2, 2017	1.0862%	1.2500%		2.3362%		
Saturday	June 3, 2017	1.0862%	1.2500%		2.3362%		
Sunday	June 4, 2017	1.0862%	1.2500%		2.3362%		
Monday	June 5, 2017	1.0842%	1.2500%		2.3342%		
Tuesday	June 6, 2017	1.0887%	1.2500%		2.3387%		
Wednesday	June 7, 2017	1.0960%	1.2500%		2.3460%		
Thursday	June 8, 2017	1.1171%	1.2500%		2.3671%		
Friday	June 9, 2017	1.1271%	1.2500%		2.3771%		
Saturday	June 10, 2017	1.1271%	1.2500%		2.3771%		
Sunday	June 11, 2017	1.1271%	1.2500%		2.3771%		
Monday	June 12, 2017	1.1393%	1.2500%		2.3893%		
Tuesday	June 13, 2017	1.1589%	1.2500%		2.4089%		
Wednesday	June 14, 2017	1.1717%	1.2500%		2.4217%		
Thursday	June 15, 2017	1.2094%	1.2500%		2.4594%		
Friday	June 16, 2017	1.2122%	1.2500%		2.4622%		
Saturday	June 17, 2017	1.2122%	1.2500%		2.4622%		
Sunday	June 18, 2017	1.2122%	1.2500%		2.4622%		
Monday	June 19, 2017	1.2139%	1.2500%		2.4639%		
Tuesday	June 20, 2017	1.2156%	1.2500%		2.4656%		
Wednesday	June 21, 2017	1.2156%	1.2500%		2.4656%		
Thursday	June 22, 2017	1.2161%	1.2500%		2.4661%		
Friday	June 23, 2017	1.2200%	1.2500%		2.4700%		
Saturday	June 24, 2017	1.2200%	1.2500%		2.4700%		
Sunday	June 25, 2017	1.2200%	1.2500%		2.4700%		
Monday	June 26, 2017	1.2221%	1.2500%		2.4721%		
Tuesday	June 27, 2017	1.2238%	1.2500%		2.4738%		
Wednesday	June 28, 2017	1.2261%	1.2500%		2.4761%		
Thursday	June 29, 2017	1.2272%	1.2500%		2.4772%	Average	Monthly Rate
Friday	June 30, 2017	1.2239%	1.2500%		2.4739%	2.42%	0.20%
Saturday	July 1, 2017	1.2239%	1.2500%		2.4739%		
Sunday	July 2, 2017	1.2239%	1.2500%		2.4739%		
Monday	July 3, 2017	1.2269%	1.2500%		2.4769%		
Tuesday	July 4, 2017	1.2233%	1.2500%		2.4733%		
Wednesday	July 5, 2017	1.2233%	1.2500%		2.4733%		
Thursday	July 6, 2017	1.2244%	1.2500%		2.4744%		
Friday	July 7, 2017	1.2263%	1.2500%		2.4763%		
Saturday	July 8, 2017	1.2263%	1.2500%		2.4763%		
Sunday	July 9, 2017	1.2263%	1.2500%		2.4763%		
Monday	July 10, 2017	1.2239%	1.2500%		2.4739%		
Tuesday	July 11, 2017	1.2239%	1.2500%		2.4739%		
Wednesday	July 12, 2017	1.2244%	1.2500%		2.4744%		
Thursday	July 13, 2017	1.2256%	1.2500%		2.4756%		
Friday	July 14, 2017	1.2261%	1.2500%		2.4761%		
Saturday	July 15, 2017	1.2261%	1.2500%		2.4761%		
Sunday	July 16, 2017	1.2261%	1.2500%		2.4761%		
Monday	July 17, 2017	1.2283%	1.2500%		2.4783%		
Tuesday	July 18, 2017	1.2278%	1.2500%		2.4778%		
Wednesday	July 19, 2017	1.2289%	1.2500%		2.4789%		
Thursday	July 20, 2017	1.2272%	1.2500%		2.4772%		
Friday	July 21, 2017	1.2322%	1.2500%		2.4822%		
Saturday	July 22, 2017	1.2322%	1.2500%		2.4822%		
Sunday	July 23, 2017	1.2322%	1.2500%		2.4822%		
Monday	July 24, 2017	1.2328%	1.2500%		2.4828%		
Tuesday	July 25, 2017	1.2328%	1.2500%		2.4828%		
Wednesday	July 26, 2017	1.2333%	1.2500%		2.4833%		
Thursday	July 27, 2017	1.2339%	1.2500%		2.4839%		
Friday	July 28, 2017	1.2317%	1.2500%		2.4817%		
Saturday	July 29, 2017	1.2317%	1.2500%		2.4817%		
Sunday	July 30, 2017	1.2317%	1.2500%		2.4817%	Average	Monthly Rate
Monday	July 31, 2017	1.2317%	1.2500%		2.4817%	2.48%	0.21%

KCP&L Greater Missouri Operations Company

9 (A) 2.D (II) - Calculation of the short-term borrowing rate

Day	Date	One Month LIBOR	Applicable Margin	Upfront Fees	Daily Rate		
Tuesday	August 1, 2017	1.2317%	1.2500%		2.4817%		
Wednesday	August 2, 2017	1.2306%	1.2500%		2.4806%		
Thursday	August 3, 2017	1.2306%	1.2500%		2.4806%		
Friday	August 4, 2017	1.2289%	1.2500%		2.4789%		
Saturday	August 5, 2017	1.2289%	1.2500%		2.4789%		
Sunday	August 6, 2017	1.2289%	1.2500%		2.4789%		
Monday	August 7, 2017	1.2289%	1.2500%		2.4789%		
Tuesday	August 8, 2017	1.2306%	1.2500%		2.4806%		
Wednesday	August 9, 2017	1.2289%	1.2500%		2.4789%		
Thursday	August 10, 2017	1.2289%	1.2500%		2.4789%		
Friday	August 11, 2017	1.2267%	1.2500%		2.4767%		
Saturday	August 12, 2017	1.2267%	1.2500%		2.4767%		
Sunday	August 13, 2017	1.2267%	1.2500%		2.4767%		
Monday	August 14, 2017	1.2278%	1.2500%		2.4778%		
Tuesday	August 15, 2017	1.2283%	1.2500%		2.4783%		
Wednesday	August 16, 2017	1.2283%	1.2500%		2.4783%		
Thursday	August 17, 2017	1.2306%	1.2500%		2.4806%		
Friday	August 18, 2017	1.2350%	1.2500%		2.4850%		
Saturday	August 19, 2017	1.2350%	1.2500%		2.4850%		
Sunday	August 20, 2017	1.2350%	1.2500%		2.4850%		
Monday	August 21, 2017	1.2356%	1.2500%		2.4856%		
Tuesday	August 22, 2017	1.2361%	1.2500%		2.4861%		
Wednesday	August 23, 2017	1.2344%	1.2500%		2.4844%		
Thursday	August 24, 2017	1.2339%	1.2500%		2.4839%		
Friday	August 25, 2017	1.2356%	1.2500%		2.4856%		
Saturday	August 26, 2017	1.2356%	1.2500%		2.4856%		
Sunday	August 27, 2017	1.2356%	1.2500%		2.4856%		
Monday	August 28, 2017	1.2356%	1.2500%		2.4856%		
Tuesday	August 29, 2017	1.2389%	1.2500%		2.4889%		
Wednesday	August 30, 2017	1.2372%	1.2500%		2.4872%	Average	Monthly Rate
Thursday	August 31, 2017	1.2317%	1.2500%		2.4817%	2.48%	0.21%
Friday	September 1, 2017	1.2306%	1.2500%		2.4806%		
Saturday	September 2, 2017	1.2306%	1.2500%		2.4806%		
Sunday	September 3, 2017	1.2306%	1.2500%		2.4806%		
Monday	September 4, 2017	1.2317%	1.2500%		2.4817%		
Tuesday	September 5, 2017	1.2311%	1.2500%		2.4811%		
Wednesday	September 6, 2017	1.2322%	1.2500%		2.4822%		
Thursday	September 7, 2017	1.2350%	1.2500%		2.4850%		
Friday	September 8, 2017	1.2361%	1.2500%		2.4861%		
Saturday	September 9, 2017	1.2361%	1.2500%		2.4861%		
Sunday	September 10, 2017	1.2361%	1.2500%		2.4861%		
Monday	September 11, 2017	1.2361%	1.2500%		2.4861%		
Tuesday	September 12, 2017	1.2367%	1.2500%		2.4867%		
Wednesday	September 13, 2017	1.2344%	1.2500%		2.4844%		
Thursday	September 14, 2017	1.2344%	1.2500%		2.4844%		
Friday	September 15, 2017	1.2372%	1.2500%		2.4872%		
Saturday	September 16, 2017	1.2372%	1.2500%		2.4872%		
Sunday	September 17, 2017	1.2372%	1.2500%		2.4872%		
Monday	September 18, 2017	1.2361%	1.2500%		2.4861%		
Tuesday	September 19, 2017	1.2372%	1.2500%		2.4872%		
Wednesday	September 20, 2017	1.2356%	1.2500%		2.4856%		
Thursday	September 21, 2017	1.2372%	1.2500%		2.4872%		
Friday	September 22, 2017	1.2383%	1.2500%		2.4883%		
Saturday	September 23, 2017	1.2383%	1.2500%		2.4883%		
Sunday	September 24, 2017	1.2383%	1.2500%		2.4883%		
Monday	September 25, 2017	1.2367%	1.2500%		2.4867%		
Tuesday	September 26, 2017	1.2344%	1.2500%		2.4844%		
Wednesday	September 27, 2017	1.2350%	1.2500%		2.4850%		
Thursday	September 28, 2017	1.2350%	1.2500%		2.4850%		
Friday	September 29, 2017	1.2322%	1.2500%		2.4822%	Average	Monthly Rate
Saturday	September 30, 2017	1.2322%	1.2500%		2.4822%	2.48%	0.21%

KCP&L Greater Missouri Operations Company

9 (A) 2.D (II) - Calculation of the short-term borrowing rate

Day	Date	One Month LIBOR	Applicable Margin	Upfront Fees	Daily Rate		
Sunday	October 1, 2017	1.2322%	1.2500%		2.4822%		
Monday	October 2, 2017	1.2333%	1.2500%		2.4833%		
Tuesday	October 3, 2017	1.2378%	1.2500%		2.4878%		
Wednesday	October 4, 2017	1.2378%	1.2500%		2.4878%		
Thursday	October 5, 2017	1.2378%	1.2500%		2.4878%		
Friday	October 6, 2017	1.2350%	1.2500%		2.4850%		
Saturday	October 7, 2017	1.2350%	1.2500%		2.4850%		
Sunday	October 8, 2017	1.2350%	1.2500%		2.4850%		
Monday	October 9, 2017	1.2372%	1.2500%		2.4872%		
Tuesday	October 10, 2017	1.2378%	1.2500%		2.4878%		
Wednesday	October 11, 2017	1.2389%	1.2500%		2.4889%		
Thursday	October 12, 2017	1.2389%	1.2500%		2.4889%		
Friday	October 13, 2017	1.2367%	1.2500%		2.4867%		
Saturday	October 14, 2017	1.2367%	1.2500%		2.4867%		
Sunday	October 15, 2017	1.2367%	1.2500%		2.4867%		
Monday	October 16, 2017	1.2367%	1.2500%		2.4867%		
Tuesday	October 17, 2017	1.2378%	1.2500%		2.4878%		
Wednesday	October 18, 2017	1.2389%	1.2500%		2.4889%		
Thursday	October 19, 2017	1.2389%	1.2500%		2.4889%		
Friday	October 20, 2017	1.2379%	1.2500%		2.4879%		
Saturday	October 21, 2017	1.2379%	1.2500%		2.4879%		
Sunday	October 22, 2017	1.2379%	1.2500%		2.4879%		
Monday	October 23, 2017	1.2379%	1.2500%		2.4879%		
Tuesday	October 24, 2017	1.2396%	1.2500%		2.4896%		
Wednesday	October 25, 2017	1.2400%	1.2500%		2.4900%		
Thursday	October 26, 2017	1.2417%	1.2500%		2.4917%		
Friday	October 27, 2017	1.2423%	1.2500%		2.4923%		
Saturday	October 28, 2017	1.2423%	1.2500%		2.4923%		
Sunday	October 29, 2017	1.2423%	1.2500%		2.4923%		
Monday	October 30, 2017	1.2421%	1.2500%		2.4921%	Average	Monthly Rate
Tuesday	October 31, 2017	1.2433%	1.2500%		2.4933%	2.49%	0.21%
Wednesday	November 1, 2017	1.2433%	1.2500%		2.4933%		
Thursday	November 2, 2017	1.2421%	1.2500%		2.4921%		
Friday	November 3, 2017	1.2432%	1.2500%		2.4932%		
Saturday	November 4, 2017	1.2432%	1.2500%		2.4932%		
Sunday	November 5, 2017	1.2432%	1.2500%		2.4932%		
Monday	November 6, 2017	1.2442%	1.2500%		2.4942%		
Tuesday	November 7, 2017	1.2439%	1.2500%		2.4939%		
Wednesday	November 8, 2017	1.2461%	1.2500%		2.4961%		
Thursday	November 9, 2017	1.2449%	1.2500%		2.4949%		
Friday	November 10, 2017	1.2461%	1.2500%		2.4961%		
Saturday	November 11, 2017	1.2461%	1.2500%		2.4961%		
Sunday	November 12, 2017	1.2461%	1.2500%		2.4961%		
Monday	November 13, 2017	1.2503%	1.2500%		2.5003%		
Tuesday	November 14, 2017	1.2635%	1.2500%		2.5135%		
Wednesday	November 15, 2017	1.2660%	1.2500%		2.5160%		
Thursday	November 16, 2017	1.2827%	1.2500%		2.5327%		
Friday	November 17, 2017	1.2872%	1.2500%		2.5372%		
Saturday	November 18, 2017	1.2872%	1.2500%		2.5372%		
Sunday	November 19, 2017	1.2872%	1.2500%		2.5372%		
Monday	November 20, 2017	1.2942%	1.2500%		2.5442%		
Tuesday	November 21, 2017	1.3129%	1.2500%		2.5629%		
Wednesday	November 22, 2017	1.3275%	1.2500%		2.5775%		
Thursday	November 23, 2017	1.3286%	1.2500%		2.5786%		
Friday	November 24, 2017	1.3376%	1.2500%		2.5876%		
Saturday	November 25, 2017	1.3376%	1.2500%		2.5876%		
Sunday	November 26, 2017	1.3376%	1.2500%		2.5876%		
Monday	November 27, 2017	1.3468%	1.2500%		2.5968%		
Tuesday	November 28, 2017	1.3498%	1.2500%		2.5998%		
Wednesday	November 29, 2017	1.3607%	1.2500%		2.6107%	Average	Monthly Rate
Thursday	November 30, 2017	1.3719%	1.2500%		2.6219%	2.54%	0.21%

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9 (A) 2.D (III) - Identification of any changes in the basis used for determining the short-term borrowing rate

9 (A) 2.D (IV) - If change, copies of the changed basis or identification of where it may be reviewed

None

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9 (A) 2.E - Any additional information that the commission has ordered

None

9 (A) 3
Workpapers

KCP&L Greater Missouri Operations Company
Section 9 True-Ups of RAMs

Summary

21st Accumulation

Accumulation Period: June 1, 2017 through November 30, 2017

Recovery Period: March 1, 2018 through February 28, 2019

	GMO	
21st Accumulation	\$ 8,793,166	ER-2018-0180
True-Up Amount (T)	(546,583)	ER-2018-0180
Interest (I)	68,815	ER-2018-0180
Prudence Adjustment Amount (P)	-	ER-2018-0180
Fuel and Purchased Power Adjustment (FPA)	8,315,398	ER-2018-0180
21st Accumulation Recovery	(8,512,955)	
Proposed Adjustment for (Over)/Under Recovery	\$ (197,557)	
Adjustment/Correction to Current Accumulation - 24th Accumulation	-	correction, see 9 (A) 2.B
Adjustment/Correction to Current Accumulation - 24th Accumulation	-	correction interest, see 9 (A) 2.B
Total Proposed True-Up Amount (T) for 24th Accumulation	\$ (197,557)	

GMO Missouri FAC Accumulation

	Residential	Commercial	Industrial	Streetlights	Gov't-Other	Total Retail	Wholesale	Total
Jun-17	\$ 581,744	\$ 526,436	\$ 200,805	\$ 4,512	\$ (4,248)	\$ 1,309,250	\$ 3,953	\$ 1,313,203
Jul-17	1,708,033	1,175,357	501,845	11,016	166,597	3,562,849	12,333	3,575,182
Aug-17	574,929	505,754	213,428	4,930	51,829	1,350,870	7,006	1,357,876
Sep-17	607,252	553,727	238,180	3,715	56,791	1,459,664	4,143	1,463,807
Oct-17	49,028	57,223	24,654	846	5,626	137,377	498	137,875
Nov-17	392,697	370,105	174,101	3,509	32,744	973,157	3,201	976,357
Total	\$ 3,913,683	\$ 3,188,603	\$ 1,353,013	\$ 28,528	\$ 309,339	\$ 8,793,166	\$ 31,133	\$ 8,824,299

GMO Missouri FAC Recovery

Total	Recovery												Total Recovered
	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	
Residential	290,255	286,232	234,604	344,652	412,980	368,540	342,161	254,614	244,304	330,568	342,311	393,442	3,844,662
Commercial	232,467	242,090	260,637	305,621	326,397	326,547	298,233	282,840	264,508	265,618	271,276	288,342	3,364,576
Industrial	98,970	104,243	112,235	110,419	115,716	115,490	111,581	104,232	104,079	82,393	112,750	79,520	1,251,629
Gov't-Other	24,478	23,147	4,463	-	-	-	-	-	-	-	-	-	52,088
Total	646,170	655,712	611,940	760,692	855,094	810,577	751,975	641,685	612,890	678,579	726,337	761,304	8,512,955

Primary voltage

Commercial	35,430	37,232	41,327	46,044	50,205	51,395	41,802	46,960	39,493	41,356	40,797	43,545	515,586
Industrial	40,709	44,773	49,209	46,465	48,464	51,746	44,568	46,106	45,575	31,503	52,750	34,935	536,803
Gov't-Other	1,941	2,138	348	-	-	-	-	-	-	-	-	-	4,427
Total	78,079	84,143	90,885	92,509	98,669	103,141	86,370	93,067	85,068	72,858	93,547	78,481	1,056,817

Current Period CAF	0.00099	81.1%	Current Period CAF	0.00134	57.5%
Previous Period CAF	0.00023	18.9%	Previous Period CAF	0.00099	42.5%
Annual CAF	0.00122		Annual CAF	0.00233	
Current Period CAF %	81.148%		Previous Period CAF %	42.489%	

Secondary voltage

Residential	290,255	286,232	234,604	344,652	412,980	368,540	342,161	254,614	244,304	330,568	342,311	393,442	3,844,662
Commercial	197,037	204,858	219,311	259,577	276,192	275,152	256,431	235,879	225,015	224,262	230,479	244,797	2,848,990
Industrial	58,261	59,471	63,026	63,954	67,253	63,744	67,013	58,125	58,504	50,891	60,000	44,585	714,825
Gov't-Other	22,538	21,009	4,115	-	-	-	-	-	-	-	-	-	47,661
Total	568,091	571,569	521,055	668,183	756,425	707,436	665,605	548,619	527,822	605,721	632,790	682,823	7,456,138

Current Period CAF	0.00102	81.0%	Current Period CAF	0.00138	57.5%
Previous Period CAF	0.00024	19.0%	Previous Period CAF	0.00102	42.5%
Annual CAF	0.00126		Annual CAF	0.00240	
Current Period CAF %	80.952%		Previous Period CAF %	42.500%	

*Gov't-Other included in Commercial & Industrial due to new revenue class within CCB billing system effective May 2018