

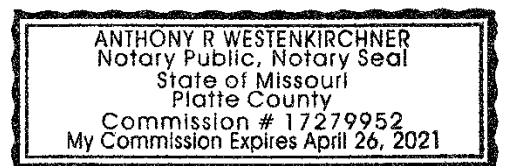
Exhibit No.:
Issue: Fuel Adjustment Clause
Witness: Lisa A. Starkebaum
Type of Exhibit: Direct Testimony
Sponsoring Party: Kansas City Power & Light Company
Case No.: EO-2020-0026
Date Testimony Prepared: July 31, 2019

MISSOURI PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

LISA A. STARKEBAUM



DIRECT TESTIMONY

OF

LISA A. STARKEBAUM

Case No. EO-2020-0026

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 Regulatory Analyst in
6 the 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 GMO.

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

20 A: Yes, I have testified before the MPSC, the Kansas Corporation Commission
21 (“KCC” or “Commission”), and have provided written testimony before the
22 Public Utilities Commission of Colorado. I have sponsored testimony in Missouri
23 related to various tariff filings involving rider mechanisms utilized by the

1 Company. In addition, I have worked closely with both MPSC and KCC Staff on
2 numerous filings and rate case matters.

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

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

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

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

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

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

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

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

11 A: The fifth accumulation period consists of six months of fuel and purchased power
12 expenses net of off system sales revenues, or July 2017 through December 2017.
13 The recovery period for this accumulation was April 2018 through March 2019.

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

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

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

1 A: For this fifth accumulation period, the KCP&L FAC was over-collected by
2 \$839,014, which includes a correction of \$248,698 plus interest on that correction
3 of \$6,685 as well as an offsetting interest correction of \$1,510.

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

5 A: The proposed true-up in this filing will be included in the next semi-annual FAC
6 rate schedule filing that is being made concurrent with this true-up filing. The
7 Company's fifth FAC recovery period ended March 31, 2019; therefore, the over-
8 recovery of \$839,014 will be included in the eighth accumulation period semi-
9 annual filing to be made on July 31, 2019 covering the accumulation period of
10 January 2019 through June 2019.

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

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

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

21 A: Yes, this filing includes two corrections. The first correction relates to an error in
22 the true-up of the third accumulation period, Case No. ER-2019-0032. The third
23 accumulation period true-up, Case No. ER-2019-0032 should have tied to the

1 third accumulation period filing, Case No. ER-2017-0204; however, the true-up
2 calculation erroneously excluded a credit of \$248,698. Schedule LAS-1, tab 9
3 (A) 2.B 1 has a worksheet illustrating this error. Interest of \$6,685 has been
4 calculated on this error from October 1, 2018, the effective date of rates in Case
5 No. ER-2019-0031, through June 30, 2019.

6 The second correction of \$1,510 relates to the seventh accumulation filing,
7 Case No. ER-2019-0223 in which interest was not calculated correctly for the
8 month of September 2018 because the remaining balance of the fourth
9 accumulation period was included twice. Schedule LAS-1, tab 9 (A) 2.B 2 has a
10 worksheet showing the interest calculation details.

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

13 A: As provided by 4 C.S.R. 240-20.090, a true-up filing is required at least annually.
14 Pursuant to the Company's FAC tariff, the amount of the true-up will be included
15 in the next accumulation period. The Company requests that the Commission
16 approve the amount to be included in the eighth accumulation period which will
17 cover the six months ended June 2019.

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

19 A: Yes, it does.

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

Kansas City Power & Light Company - Missouri Fuel Adjustment Clause (FAC)
Information below for KCP&L - Missouri
9 (A) 2.A - Any revision to the calculation of the net base energy cost

None

Kansas City Power & Light Company - Missouri Fuel Adjustment Clause (FAC)

Information below for KCP&L - Missouri

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

Correction needed for 3rd Accumulation Period True-Up error included in 6th Accumulation Period Filing, rates effective October 2018

Reconciliation between Filing and True-Up (before recovery and corrections)

	<u>1st AP</u>		<u>2nd AP</u>		<u>3rd AP</u>		<u>4th AP</u>	
Filing								
Accumulation	6,807,145	ER-2016-0198	18,436,184	ER-2017-0033	36,915,735	ER-2017-0204	19,947,159	ER-2018-0036
True-Up Amount (T)	-	ER-2016-0198	-	ER-2017-0033	(235,964)	ER-2017-0204	195,397	ER-2018-0036
Interest (I)	6,937	ER-2016-0198	124,572	ER-2017-0033	323,299	ER-2017-0204	618,681	ER-2018-0036
Prudence Adj (P)	-	ER-2016-0198	-	ER-2017-0033	-	ER-2017-0204	-	ER-2018-0036
Filing Total	6,814,082	ER-2016-0198	18,560,756	ER-2017-0033	37,003,070	ER-2017-0204	20,761,237	ER-2018-0036
True-Up								
Accumulation	6,807,145	ER-2018-0037	18,436,184	ER-2018-0207	36,915,735	ER-2019-0032	19,947,159	EO-2019-0222
True-Up Amount (T)	-	ER-2018-0037	-	ER-2018-0207	12,734	ER-2019-0032	195,397	EO-2019-0222
Interest (I)	6,937	ER-2018-0037	124,572	ER-2018-0207	323,299	ER-2019-0032	618,681	EO-2019-0222
Prudence Adj (P)	-	ER-2018-0037	-	ER-2018-0207	-	ER-2019-0032	-	EO-2019-0222
True-Up Subtotal	6,814,082	ER-2018-0037	18,560,756	ER-2018-0207	37,251,768	ER-2019-0032	20,761,237	EO-2019-0222
Recovery	(6,243,127)	ER-2018-0037	(16,958,166)	ER-2018-0207	(35,296,263)	ER-2019-0032	(21,273,189)	EO-2019-0222
(Over)/Under	570,955	ER-2018-0037	1,602,590	ER-2018-0207	1,955,505	ER-2019-0032	(511,952)	EO-2019-0222
Correction	(382,900)	ER-2018-0037	(31)	ER-2018-0207	9,610	ER-2019-0032		EO-2019-0222
Correction	1,840	ER-2018-0037	(28,735)	ER-2018-0207	23	ER-2019-0032		EO-2019-0222
Correction	-	ER-2018-0037	-	ER-2018-0207	20	ER-2019-0032		EO-2019-0222
Total True-Up	189,895	ER-2018-0037	1,573,824	ER-2018-0207	1,965,157	ER-2019-0032	(511,952)	EO-2019-0222
Difference								
Filing Total	6,814,082		18,560,756		37,003,070		20,761,237	
True-Up Subtotal	6,814,082		18,560,756		37,251,768		20,761,237	
	-		-		(248,698)		-	

Correction needed in current 8th Accumulation Period Filing (with 5th AP True-Up)

	\$	(248,698)	Interest
October-18	(734)	0.30%	
November-18	(736)	0.30%	
December-18	(738)	0.31%	
January-19	(740)	0.31%	
February-19	(743)	0.31%	
March-19	(745)	0.31%	
April-19	(747)	0.31%	
May-19	(750)	0.31%	
June-19	(752)	0.30%	
Interest Total	\$	(6,685)	

Kansas City Power & Light Company - Missouri Fuel Adjustment Clause (FAC)

Information below for KCP&L - Missouri

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

Correction needed for 7th Accumulation Period interest calculation

Interest calculation for 7th Accumulation Period included 4th Accumulation balance twice in September 2018

Correct Interest Calculation	\$ 710,166.64
Interest Calculation included in ER-2019-0223	<u>708,656.38</u>
	<u>\$ 1,510.26</u>

Interest Calculation included in ER-2019-0223	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18
7th Accumulation Accumulation by month		1,708,938	1,666,211	1,993,430	831,898	2,055,724	303,087
4th Accumulation (Over)/Under added to 7th				(511,952)			
7th Accumulation balance		1,708,938	3,375,149	4,856,628	5,688,526	7,744,250	8,047,337
4th Accumulation balance	5,541,745	3,414,166	1,410,229	(511,952)			
5th Accumulation balance	15,592,304	13,436,684	11,406,236	9,458,555	7,781,324	6,367,192	4,594,062
6th Accumulation balance	25,022,669	25,727,065	25,727,065	25,727,065	23,667,415	21,930,471	19,752,648
Previous month's balance	46,156,717	44,286,854	41,918,680	39,530,297	37,137,265	36,041,913	
Monthly interest rate		0.28%	0.28%	0.29%	0.30%	0.30%	0.31%
Interest on previous month's balance		128,084.89	122,526.96	119,817.56	116,614.38	110,483.36	111,129.23 \$ 708,656.38

Correct Interest Calculation	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18
7th Accumulation Accumulation by month		1,708,938	1,666,211	1,993,430	831,898	2,055,724	303,087
4th Accumulation (Over)/Under added to 7th				(511,952)			
7th Accumulation balance		1,708,938	3,375,149	4,856,628	5,688,526	7,744,250	8,047,337
4th Accumulation balance	5,541,745	3,414,166	1,410,229				
5th Accumulation balance	15,592,304	13,436,684	11,406,236	9,458,555	7,781,324	6,367,192	4,594,062
6th Accumulation balance	25,022,669	25,727,065	25,727,065	25,727,065	23,667,415	21,930,471	19,752,648
Previous month's balance	46,156,717	44,286,854	41,918,680	40,042,248	37,137,265	36,041,913	
Monthly interest rate		0.28%	0.28%	0.29%	0.30%	0.30%	0.31%
Interest on previous month's balance		128,084.89	122,526.96	119,817.56	118,124.63	110,483.36	111,129.23 \$ 710,166.64

Kansas City Power & Light Company - Missouri Fuel Adjustment Clause (FAC)
Information below for KCP&L - Missouri

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

	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18
5th Accumulation												
(Over)/Under Adjustment from 2nd Accum												
C/M (Over)/Under Accrued	2,919,866.00	2,470,949.54	1,353,862	3,604,610.35	3,565,710.20	3,121,556.65				1,768,889.22	1,581,946.54	1,879,426.17
C/M (Over)/Under Recovery												
CUMM (Over)/Under Balance	2,919,866	5,362,081	9,871,554	13,476,164	17,041,874	20,163,431	20,822,566	20,822,566	20,822,566	19,053,676	17,471,730	15,592,304
Correction (Transmission & Interest)	(28,735)					(1)						
Monthly STD rate	0.21%	0.21%	0.21%	0.21%	0.21%	0.23%						
C/M Accrued interest (P/M Bal)	117,115.71	113,170.35	107,822.18	104,664.30	104,655.02	111,707.84						
CUMM Accrued Interest Balance	117,116	230,286	338,108	442,773	547,428	659,135						
6th Accumulation												
(Over)/Under Adjustment from 3rd Accum												
C/M (Over)/Under Accrued							4,035,205.70	1,861,349.90	1,955,524	5,791,718.26	1,584,294.77	4,154,290.60
C/M (Over)/Under Recovery												
CUMM (Over)/Under Balance							4,035,206	5,906,188	13,492,365	19,284,083	20,868,378	25,022,669
Correction (Dec 2017 Base)							9,633					
Monthly STD rate							0.23%	0.24%	0.25%	0.26%	0.27%	0.28%
C/M Accrued interest (P/M Bal)							111,101.09	111,104.88	111,355.21	118,174.04	126,123.30	126,537.95
CUMM Accrued Interest Balance							111,101	222,206	333,561	451,735	577,859	704,396
7th Accumulation												
(Over)/Under Adjustment from 4th Accum												
C/M (Over)/Under Accrued												
C/M (Over)/Under Recovery												
CUMM (Over)/Under Balance												
Monthly STD rate												
C/M Accrued interest (P/M Bal)												
CUMM Accrued Interest Balance												
8th Accumulation												
(Over)/Under Adjustment from 5th Accum												
C/M (Over)/Under Accrued												
C/M (Over)/Under Recovery												
CUMM (Over)/Under Balance												
Correction (2nd AP TU filing error interest)												
Monthly STD rate												
C/M Accrued interest (P/M Bal)												
CUMM Accrued Interest Balance												

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

Page 6 of 16 Schedule LAS-1

Kansas City Power & Light Company - Missouri Fuel Adjustment Clause (FAC)

Information below for KCP&L Total Company

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.

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

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

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

Kansas City Power & Light Company - Missouri Fuel Adjustment Clause (FAC)

Information below for KCP&L Total Company

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

Day	Date	One Month LIBOR	Applicable Margin	Upfront Fees	Daily Rate		
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%
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%

Kansas City Power & Light Company - Missouri Fuel Adjustment Clause (FAC)

Information below for KCP&L Total Company

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

Day	Date	One Month LIBOR	Applicable Margin	Upfront Fees	Daily Rate		
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%
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%

Kansas City Power & Light Company - Missouri Fuel Adjustment Clause (FAC)

Information below for KCP&L Total Company

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

Day	Date	One Month LIBOR	Applicable Margin	Upfront Fees	Daily Rate		
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%
Friday	December 1, 2017	1.3794%	1.2500%		2.6294%		
Saturday	December 2, 2017	1.3794%	1.2500%		2.6294%		
Sunday	December 3, 2017	1.3794%	1.2500%		2.6294%		
Monday	December 4, 2017	1.3918%	1.2500%		2.6418%		
Tuesday	December 5, 2017	1.4032%	1.2500%		2.6532%		
Wednesday	December 6, 2017	1.4069%	1.2500%		2.6569%		
Thursday	December 7, 2017	1.4319%	1.2500%		2.6819%		
Friday	December 8, 2017	1.4444%	1.2500%		2.6944%		
Saturday	December 9, 2017	1.4444%	1.2500%		2.6944%		
Sunday	December 10, 2017	1.4444%	1.2500%		2.6944%		
Monday	December 11, 2017	1.4595%	1.2500%		2.7095%		
Tuesday	December 12, 2017	1.4720%	1.2500%		2.7220%		
Wednesday	December 13, 2017	1.4770%	1.2500%		2.7270%		
Thursday	December 14, 2017	1.4908%	1.2500%		2.7408%		
Friday	December 15, 2017	1.4950%	1.2500%		2.7450%		
Saturday	December 16, 2017	1.4950%	1.2500%		2.7450%		
Sunday	December 17, 2017	1.4950%	1.2500%		2.7450%		
Monday	December 18, 2017	1.5011%	1.2500%		2.7511%		
Tuesday	December 19, 2017	1.5111%	1.2500%		2.7611%		
Wednesday	December 20, 2017	1.5349%	1.2500%		2.7849%		
Thursday	December 21, 2017	1.5521%	1.2500%		2.8021%		
Friday	December 22, 2017	1.5638%	1.2500%		2.8138%		
Saturday	December 23, 2017	1.5638%	1.2500%		2.8138%		
Sunday	December 24, 2017	1.5638%	1.2500%		2.8138%		
Monday	December 25, 2017	1.5638%	1.2500%		2.8138%		
Tuesday	December 26, 2017	1.5638%	1.2500%		2.8138%		
Wednesday	December 27, 2017	1.5690%	1.2500%		2.8190%		
Thursday	December 28, 2017	1.5678%	1.2500%		2.8178%		
Friday	December 29, 2017	1.5643%	1.2500%		2.8143%		
Saturday	December 30, 2017	1.5643%	1.2500%		2.8143%	Average	Monthly Rate
Sunday	December 31, 2017	1.5643%	1.2500%		2.8143%	2.74%	0.23%

Kansas City Power & Light Company - Missouri Fuel Adjustment Clause (FAC)

Information below for KCP&L Total Company

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

Kansas City Power & Light Company - Missouri Fuel Adjustment Clause (FAC)
Information below for KCP&L - Missouri
9 (A) 2.E - Any additional information that the commission has ordered

None

9 (A) 3
Workpapers

Kansas City Power & Light Company - Missouri Fuel Adjustment Clause (FAC)
Section 9 True-Ups of RAMs

Summary

5th Accumulation

Accumulation Period: July 1, 2017 through December 31, 2017

Recovery Period: April 1, 2018 through March 31, 2019

5th Accumulation

True-Up Amount (T)

Interest (I)

Prudence Adjustment Amount (P)

Fuel and Purchased Power Adjustment (FPA)

5th Accumulation Recovery

Proposed Adjustment for (Over)/Under Recovery

Adjustment/Correction to Current Accumulation - 8th Accumulation

Adjustment/Correction to Current Accumulation - 8th Accumulation

Adjustment/Correction to Current Accumulation - 8th Accumulation

Total Proposed True-Up Amount (T) for 8th Accumulation

KCPL	
\$ 18,838,305	ER-2018-0208
1,574,675	ER-2018-0208
658,284	ER-2018-0208
-	ER-2018-0208
21,071,264	ER-2018-0208
(21,656,406)	
\$ (585,142)	
(248,698)	correction, see 9 (A) 2.B 1
(6,685)	correction interest, see 9 (A) 2.B 1
1,510	correction interest, see 9 (A) 2.B 2
\$ (839,014)	

KCP&L Missouri FAC Accumulation

	Residential	Commercial	Industrial	Streetlights	Total
Jan-17	\$ 1,244,580	\$ 1,165,913	\$ 498,113	\$ 11,260	\$ 2,919,866
Feb-17	877,092	1,082,914	505,623	5,321	2,470,950
Mar-17	1,184,787	1,340,690	614,542	15,593	3,155,612
Apr-17	1,031,903	1,702,786	848,293	21,628	3,604,610
May-17	1,179,162	1,425,302	940,188	21,059	3,565,710
Jun-17	1,215,844	1,317,955	572,288	15,470	3,121,557
Total	\$ 6,733,368	\$ 8,035,559	\$ 3,979,046	\$ 90,331	\$ 18,838,305

KCP&L Missouri FAC Recovery

Total	Recovery												Total Recovered
	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	
Residential	542,828	439,346	614,854	783,200	694,118	641,648	430,899	410,835	572,698	561,890	649,072	608,570	6,949,957
Commercial	825,085	1,017,656	929,311	1,041,205	1,009,912	964,613	861,807	794,946	896,483	856,964	971,160	902,568	11,071,710
Industrial	385,047	114,874	316,649	316,856	311,709	326,733	370,717	193,657	289,772	296,434	438,204	100,294	3,460,945
Streetlights	15,929	10,071	18,612	14,359	14,708	14,688	13,809	14,694	14,178	14,794	14,636	13,317	173,794
Total	1,768,889	1,581,947	1,879,426	2,155,620	2,030,447	1,947,681	1,677,231	1,414,132	1,773,130	1,730,082	2,073,071	1,624,749	21,656,406

Primary voltage

Commercial	195,286	144,452	179,615	200,047	197,159	180,508	179,823	148,500	151,341	157,247	192,358	157,675	2,084,010
Industrial	267,780	54,634	139,977	131,838	134,581	133,690	168,187	53,688	122,569	137,642	163,568	52,812	1,560,967
Total	463,066	199,085	319,592	331,886	331,739	314,197	348,011	202,189	273,910	294,889	355,926	210,487	3,644,977

Current Period CAF	0.00244	50.4%	Current Period CAF	0.00299	55.1%
Previous Period CAF	0.00240	49.6%	Previous Period CAF	0.00244	44.9%
Annual CAF	0.00484		Annual CAF	0.00543	
Current Period CAF %	50.413%		Previous Period CAF %	44.936%	

Trans/Sub voltage

Commercial	6,026	-	11,521	6,369	5,722	5,345	5,080	4,894	4,700	4,659	4,623	-	58,940
Industrial	54,977	9,689	122,456	125,546	121,487	135,378	145,951	91,638	115,924	111,688	217,436	(1,632)	1,250,538
Total	61,003	9,689	133,977	131,914	127,209	140,724	151,031	96,532	120,624	116,347	222,059	(1,632)	1,309,477

Current Period CAF	0.00238	50.4%	Current Period CAF	0.00292	55.1%
Previous Period CAF	0.00234	49.6%	Previous Period CAF	0.00238	44.9%
Annual CAF	0.00472		Annual CAF	0.00530	
Current Period CAF %	50.424%		Previous Period CAF %	44.906%	

Secondary voltage

Residential	542,828	439,346	614,854	783,200	694,118	641,648	430,899	410,835	572,698	561,890	649,072	608,570	6,949,957
Commercial	623,773	873,204	738,175	834,789	807,031	778,760	676,903	641,552	740,441	695,058	774,179	744,893	8,928,760
Industrial	62,291	50,551	54,216	59,472	55,642	57,665	56,579	48,331	51,278	47,104	57,199	49,114	649,441
Streetlights	15,929	10,071	18,612	14,359	14,708	14,688	13,809	14,694	14,178	14,794	14,636	13,317	173,794
Total	1,244,821	1,373,172	1,425,858	1,691,820	1,571,499	1,492,760	1,178,189	1,115,411	1,378,596	1,318,846	1,495,086	1,415,894	16,701,952

Current Period CAF	0.00249	50.3%	Current Period CAF	0.00306	55.1%
Previous Period CAF	0.00246	49.7%	Previous Period CAF	0.00249	44.9%
Annual CAF	0.00495		Annual CAF	0.00555	
Current Period CAF %	50.303%		Previous Period CAF %	44.865%	