

**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) Case No. ER-2012-0174
a General Rate Increase for Electric Service.)

**KANSAS CITY POWER & LIGHT COMPANY'S RESPONSE TO MECG'S MOTION
FOR CLARIFICATION AND MOTION FOR EXPEDITED TREATMENT, AND TO
PUBLIC COUNSEL'S RESPONSE TO MECG'S MOTION FOR CLARIFICATION**

Kansas City Power & Light Company ("KCP&L" or "Company") hereby responds to the Motion For Clarification And Motion For Expedited Treatment filed by the Midwest Energy Consumers' Group ("MECG") and to Public Counsel's Response To Motion For Clarification And Motion For Expedited Treatment which were both filed on January 10, 2013.¹ In support of its response, KCP&L states as follows:

1. On January 10, 2013, MECG filed its Motion For Clarification And Motion For Expedited Treatment requesting that the Commission grant expedited treatment and issue its order clarifying the Report and Order. For the reasons stated herein, KCP&L supports MECG's motion for clarification, and recommends that the Commission approve the rate design proposal contained in the Direct Testimony of Maurice Brubaker (Ex No. 406, pp. 32-33) in a clarification order. This LG/LP rate design proposal was supported by KCP&L, Staff, MECG and MIEC in the Non-Unanimous Stipulation and Agreement Regarding Class Cost of Service / Rate Design filed on October 29, 2012. It was also supported by KCP&L in the Rebuttal Testimony of Tim M. Rush. (Rush Rebuttal, Ex No. KCPL-42, pp. 12-13; See also Rush Surrebuttal, Ex No. KCPL-43, p. 13))

2. As Public Counsel noted in his response, the Non-Unanimous Stipulation and Agreement Regarding Class Cost of Service / Rate Design was objected to by Public Counsel.

¹ On January 10, 2013, the Commission also issued an order which directed that any responses to MECG's motion should be filed by noon on January 11, 2013.

Therefore, the Commission should resolve this LG/LP rate design issue based upon the competent and substantial evidence in the record. See 4 CSR 240-2.115(2)(D). While the Company continues to support all of the terms and provisions of the Non-Unanimous Stipulation and Agreement, KCP&L also believes that the Direct Testimony of Maurice Brubaker on pages 32-33 and the Rebuttal Testimony of Tim M. Rush support Mr. Brubaker's proposal related to the LG/LP rate design issue and is a reasonable resolution of this issue. (Brubaker Direct, Ex No. 406, pp. 32-33) In the Rebuttal Testimony of Tim M. Rush, Mr. Rush also testified that Mr. Brubaker's proposal on this issue made sense, and he "is not proposing a radical change in rate design, but is addressing the significance that the current rates places on energy and recommending that more of the rate design should reflect demand costs on the demand portion of the rates, rather than on the tail energy block." (Rush Rebuttal, Ex No. KCPL-42, pp. 12-13; See also Rush Surrebuttal, Ex No. KCPL-43, p. 13)

3. Public Counsel also noted "Public Counsel takes no position on whether the Commission can or should find some other basis in the record to implement changes to the design of the Large General Service and Large Power rates." (Public Counsel Response, p. 3)

WHEREFORE, Kansas City Power & Light Company respectfully files this response to MECG's Motion and Public Counsel's Response filed on January 10, 2013, and recommends that the Commission approve the LG/LP rate design proposal contained in the Direct Testimony of Maurice Brubaker and discussed in the Rebuttal and Surrebuttal Testimony of Tim M. Rush.

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 11th day of January, 2013.

/s/ James M. Fischer
Attorney for Kansas City Power & Light
Company