

Exhibit No.:
Issue: Fuel Adjustment Clause
Witness: Lisa A. Starkebaum
Type of Exhibit: Direct Testimony
Sponsoring Party: Kansas City Power & Light
Case No.: EO-2019-0222
Date Testimony Prepared: January 31, 2019

MISSOURI PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

LISA A. STARKEBAUM


In the Matter of the Application of Kansas City)
Power & Light Company Containing Its Semi-) Case No. EO-2019-0222
Annual Fuel Adjustment Clause True-Up)

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

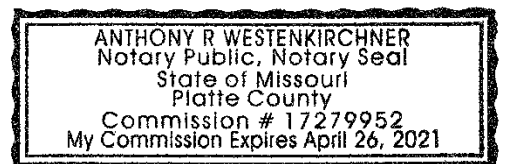
1. My name is Lisa A. Starkebaum. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Manager - Regulatory Affairs.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Lisa A. Starkebaum
Lisa A. Starkebaum


Notary Public

My commission expires: 4/26/2021



DIRECT TESTIMONY

OF

LISA A. STARKEBAUM

Case No. ER-2019-0222

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, most recently as a Lead Regulatory
6 Analyst. As a Lead Analyst, 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 compliance reporting and was later
10 promoted to Manager, Regulatory Affairs effective June 2018. In my current
11 position, I am responsible for overseeing various reporting requirements to ensure
12 Westar, KCP&L and GMO are compliant with its jurisdictional rules and
13 regulations, in addition to the implementation of new reporting or commitments
14 resulting from various rate case orders and other regulatory filings. In addition, I
15 oversee the coordination, review and filing of the various rider mechanisms
16 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. In addition, I have worked closely with
23 both MPSC and KCC Staff on numerous filings and rate case matters.

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

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

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

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

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

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

1 Rate (“FAR”). The FAR is the rate that will be charged to customers over the
2 recovery period. The time between the accumulation period and the beginning of
3 the recovery period is three months. The recovery period for KCP&L is 12
4 months. After the recovery period, a true-up is filed which reflects all the
5 activities and summarizes the balances of the FAC. The balances will then be
6 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 fourth accumulation period consists of six months of fuel and purchased
10 power expenses net of off system sales revenues, or January 2017 through June
11 2017. The recovery period for this accumulation was October 2017 through
12 September 2018.

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’s billed. This
18 difference will be “trued-up” in the next FAC filing.

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

21 A: For this fourth accumulation period, the KCP&L FAC was over-recovered by
22 \$511,952.

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

1 A: The proposed true-up in this filing will be included in the next semi-annual FAC
2 rate schedule filing that is being made concurrent with this true-up filing. The
3 Company's fourth FAC recovery period ended September 30, 2018; therefore, the
4 over-recovery of \$511,952 will be included in the seventh accumulation period
5 semi-annual filing and covers the accumulation period of July 2018 through
6 December 2018.

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 with
18 this true-up 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 the True-Ups of RAMs as provided in 4 CSR
22 240-20.090(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 seventh accumulation period which will
7 cover the six months ended December 2018.

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**

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

None

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

| | Jan-17 | Feb-17 | Mar-17 | Apr-17 | May-17 | Jun-17 | Jul-17 | Aug-17 | Sep-17 | Oct-17 | Nov-17 | Dec-17 |
|--|-----------------|--------------|-------------------------|--------------|--------------|--------------|---------------------|--------------|-------------------------|---------------|---------------|---------------|
| | ← Jan-17 Feb-17 | | 4th Accumulation period | | | → Jun-17 | Filing and Approval | | → Sep-17 | ← Oct-17 | Nov-17 | Dec-17 |
| 4th Accumulation | Jan-17 | Feb-17 | Mar-17 | Apr-17 | May-17 | Jun-17 | Jul-17 | Aug-17 | Sep-17 | Oct-17 | Nov-17 | Dec-17 |
| (Over)/Under Adjustment from 1st Accum | | | 560,544 | | | 10,411 | | | | | | |
| C/M (Over)/Under Accrued | 3,866,898.57 | 3,662,985.24 | 4,045,750.07 | 2,513,343.81 | 1,179,478.47 | 4,678,702.81 | | | | | | |
| C/M (Over)/Under Recovery | | | | | | | | | | 1,658,051.14 | 1,471,675.92 | 1,657,346.15 |
| CUMM (Over)/Under Balance | 3,866,899 | 7,529,884 | 12,136,178 | 14,649,522 | 15,829,000 | 20,124,803 | 20,761,237 | 20,761,237 | 20,761,237 | 19,103,186 | 17,631,510 | 15,974,164 |
| Corrections (Property Tax & Dep and Interest adjustment) | | | | | (382,900) | 1,840 | | | | | | |
| Monthly STD rate | 0.17% | 0.17% | 0.18% | 0.19% | 0.19% | 0.20% | | | | | | |
| C/M Accrued interest (P/M Bal) | 90,288.37 | 94,055.98 | 103,961.82 | 110,922.62 | 111,530.04 | 113,424.37 | | | | | | |
| CUMM Accrued Interest Balance | 90,288 | 184,344 | 288,306 | 399,229 | 510,759 | 624,183 | | | | | | |
| | | | | | | | ← Jul-17 Aug-17 | | 5th Accumulation period | | | → Dec-17 |
| 5th Accumulation | | | | | | | Jul-17 | Aug-17 | Sep-17 | Oct-17 | Nov-17 | Dec-17 |
| (Over)/Under Adjustment from 2nd Accum | | | | | | | | | 1,353,862 | | | |
| C/M (Over)/Under Accrued | | | | | | | 2,919,866.00 | 2,470,949.54 | 3,155,611.76 | 3,604,610.35 | 3,565,710.20 | 3,121,556.65 |
| C/M (Over)/Under Recovery | | | | | | | | | | | | |
| CUMM (Over)/Under Balance | | | | | | | 2,919,866.00 | 5,362,080.54 | 9,871,553.90 | 13,476,164.25 | 17,041,874.45 | 20,163,431.10 |
| 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 | | | | | | | | | | | | |
| C/M (Over)/Under Recovery | | | | | | | | | | | | |
| CUMM (Over)/Under Balance | | | | | | | | | | | | |
| Correction (Dec 2017 Base) | | | | | | | | | | | | |
| Monthly STD rate | | | | | | | | | | | | |
| C/M Accrued interest (P/M Bal) | | | | | | | | | | | | |
| CUMM Accrued Interest Balance | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| 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 | | | | | | | | | | | | |

Kansas City Power & Light Company - Missouri 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

| | Jan-18 | Feb-18 | Mar-18 | Apr-18 | May-18 | Jun-18 | Jul-18 | Aug-18 | Sep-18 | Oct-18 | Nov-18 | Dec-18 |
|--|---------------|---------------------------------------|---|---------------|---------------|---------------|---------------------------------------|-----------------------------------|---|---------------|-----------------------------------|---------------|
| 4th Accumulation | Jan-18 | Recovery Period Feb-18 | Mar-18 | Apr-18 | May-18 | Jun-18 | Jul-18 | Aug-18 | Sep-18 | | | |
| (Over)/Under Adjustment from 1st Accum | | | | | | | | | | | | |
| C/M (Over)/Under Accrued | | | | | | | | | | | | |
| C/M (Over)/Under Recovery | 1,934,712.06 | 1,740,829.88 | 1,594,870.71 | 1,745,274.89 | 1,561,975.76 | 1,854,756.25 | 2,127,578.51 | 2,003,937.44 | 1,922,180.32 | | | |
| CUMM (Over)/Under Balance | 14,039,452 | 12,298,622 | 10,703,752 | 8,958,477 | 7,396,501 | 5,541,745 | 3,414,166 | 1,410,229 | (511,952) | | | |
| Corrections (Property Tax & Dep and Interest adjustment) | | | | | | | | | | | | |
| Monthly STD rate | | | | | | | | | | | | |
| C/M Accrued interest (P/M Bal) | | | | | | | | | | | | |
| CUMM Accrued Interest Balance | | | | | | | | | | | | |
| 5th Accumulation | Jan-18 | Filing and Approval Feb-18 | Mar-18 | Apr-18 | May-18 | Jun-18 | Jul-18 | Recovery Period Aug-18 | Sep-18 | Oct-18 | Nov-18 | Dec-18 |
| (Over)/Under Adjustment from 2nd Accum | | | | | | | | | | | | |
| C/M (Over)/Under Accrued | | | | | | | | | | | | |
| C/M (Over)/Under Recovery | | | | 1,768,889.22 | 1,581,946.54 | 1,879,426.17 | 2,155,619.68 | 2,030,447.48 | 1,947,681.26 | 1,677,231.17 | 1,414,131.58 | 1,773,130.29 |
| CUMM (Over)/Under Balance | 20,822,566 | 20,822,566 | 20,822,566 | 19,053,676 | 17,471,730 | 15,592,304 | 13,436,684 | 11,406,236 | 9,458,555 | 7,781,324 | 6,367,192 | 4,594,062 |
| Correction (Transmission & Interest) | | | | | | | | | | | | |
| Monthly STD rate | | | | | | | | | | | | |
| C/M Accrued interest (P/M Bal) | | | | | | | | | | | | |
| CUMM Accrued Interest Balance | | | | | | | | | | | | |
| 6th Accumulation | Jan-18 | Feb-18 | 6th Accumulation period Mar-18 | Apr-18 | May-18 | Jun-18 | Filing and Approval Jul-18 | Aug-18 | Sep-18 | Oct-18 | Recovery Period Nov-18 | Dec-18 |
| (Over)/Under Adjustment from 3rd Accum | | | 1,955,524 | | | | | | | | | |
| C/M (Over)/Under Accrued | 4,035,205.70 | 1,861,349.90 | 5,630,652.81 | 5,791,718.26 | 1,584,294.77 | 4,154,290.60 | | | | 2,059,649.76 | 1,736,944.15 | 2,177,823.04 |
| C/M (Over)/Under Recovery | | | | | | | | | | 23,667,415 | 21,930,471 | 19,752,648 |
| CUMM (Over)/Under Balance | 4,035,205.70 | 5,906,188.30 | 13,492,365.12 | 19,284,083.38 | 20,868,378.16 | 25,022,668.75 | 25,727,065 | 25,727,065 | 25,727,065 | | | |
| 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 | | | | | | | Jul-18 | Aug-18 | 7th Accumulation period Sep-18 | Oct-18 | Nov-18 | Dec-18 |
| (Over)/Under Adjustment from 4th Accum | | | | | | | | | (511,952) | | | |
| C/M (Over)/Under Accrued | | | | | | | 1,708,938.28 | 1,666,211.15 | 1,993,430.15 | 831,897.87 | 2,055,723.93 | 303,087.38 |
| C/M (Over)/Under Recovery | | | | | | | | | | | | |
| CUMM (Over)/Under Balance | | | | | | | 1,708,938.28 | 3,375,149.43 | 4,856,627.95 | 5,688,525.82 | 7,744,249.75 | 8,047,337.13 |
| Monthly STD rate | | | | | | | 0.28% | 0.28% | 0.29% | 0.30% | 0.30% | 0.31% |
| C/M Accrued interest (P/M Bal) | | | | | | | 128,084.89 | 122,526.96 | 119,817.56 | 116,614.38 | 110,483.36 | 111,129.23 |
| CUMM Accrued Interest Balance | | | | | | | 128,085 | 250,612 | 370,429 | 487,044 | 597,527 | 708,656 |

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 January 2017 through September 18, 2018, 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.

| 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 | A |
| Commercial Paper | P-2 | A-2 | P-2 | A-2 | 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 | | |
|-----------|-------------------|-----------------|-------------------|--------------|------------|----------------|---------------------|
| Sunday | January 1, 2017 | 0.7717% | 1.2500% | | 2.0217% | | |
| Monday | January 2, 2017 | 0.7717% | 1.2500% | | 2.0217% | | |
| Tuesday | January 3, 2017 | 0.7733% | 1.2500% | | 2.0233% | | |
| Wednesday | January 4, 2017 | 0.7656% | 1.2500% | | 2.0156% | | |
| Thursday | January 5, 2017 | 0.7656% | 1.2500% | | 2.0156% | | |
| Friday | January 6, 2017 | 0.7633% | 1.2500% | | 2.0133% | | |
| Saturday | January 7, 2017 | 0.7633% | 1.2500% | | 2.0133% | | |
| Sunday | January 8, 2017 | 0.7633% | 1.2500% | | 2.0133% | | |
| Monday | January 9, 2017 | 0.7633% | 1.2500% | | 2.0133% | | |
| Tuesday | January 10, 2017 | 0.7650% | 1.2500% | | 2.0150% | | |
| Wednesday | January 11, 2017 | 0.7672% | 1.2500% | | 2.0172% | | |
| Thursday | January 12, 2017 | 0.7672% | 1.2500% | | 2.0172% | | |
| Friday | January 13, 2017 | 0.7683% | 1.2500% | | 2.0183% | | |
| Saturday | January 14, 2017 | 0.7683% | 1.2500% | | 2.0183% | | |
| Sunday | January 15, 2017 | 0.7683% | 1.2500% | | 2.0183% | | |
| Monday | January 16, 2017 | 0.7678% | 1.2500% | | 2.0178% | | |
| Tuesday | January 17, 2017 | 0.7694% | 1.2500% | | 2.0194% | | |
| Wednesday | January 18, 2017 | 0.7767% | 1.2500% | | 2.0267% | | |
| Thursday | January 19, 2017 | 0.7764% | 1.2500% | | 2.0264% | | |
| Friday | January 20, 2017 | 0.7753% | 1.2500% | | 2.0253% | | |
| Saturday | January 21, 2017 | 0.7753% | 1.2500% | | 2.0253% | | |
| Sunday | January 22, 2017 | 0.7753% | 1.2500% | | 2.0253% | | |
| Monday | January 23, 2017 | 0.7711% | 1.2500% | | 2.0211% | | |
| Tuesday | January 24, 2017 | 0.7733% | 1.2500% | | 2.0233% | | |
| Wednesday | January 25, 2017 | 0.7761% | 1.2500% | | 2.0261% | | |
| Thursday | January 26, 2017 | 0.7761% | 1.2500% | | 2.0261% | | |
| Friday | January 27, 2017 | 0.7783% | 1.2500% | | 2.0283% | | |
| Saturday | January 28, 2017 | 0.7783% | 1.2500% | | 2.0283% | | |
| Sunday | January 29, 2017 | 0.7783% | 1.2500% | | 2.0283% | | |
| Monday | January 30, 2017 | 0.7800% | 1.2500% | | 2.0300% | Average | Monthly Rate |
| Tuesday | January 31, 2017 | 0.7794% | 1.2500% | | 2.0294% | 2.02% | 0.17% |
| Wednesday | February 1, 2017 | 0.7800% | 1.2500% | | 2.0300% | | |
| Thursday | February 2, 2017 | 0.7767% | 1.2500% | | 2.0267% | | |
| Friday | February 3, 2017 | 0.7756% | 1.2500% | | 2.0256% | | |
| Saturday | February 4, 2017 | 0.7756% | 1.2500% | | 2.0256% | | |
| Sunday | February 5, 2017 | 0.7756% | 1.2500% | | 2.0256% | | |
| Monday | February 6, 2017 | 0.7753% | 1.2500% | | 2.0253% | | |
| Tuesday | February 7, 2017 | 0.7728% | 1.2500% | | 2.0228% | | |
| Wednesday | February 8, 2017 | 0.7717% | 1.2500% | | 2.0217% | | |
| Thursday | February 9, 2017 | 0.7706% | 1.2500% | | 2.0206% | | |
| Friday | February 10, 2017 | 0.7711% | 1.2500% | | 2.0211% | | |
| Saturday | February 11, 2017 | 0.7711% | 1.2500% | | 2.0211% | | |
| Sunday | February 12, 2017 | 0.7711% | 1.2500% | | 2.0211% | | |
| Monday | February 13, 2017 | 0.7700% | 1.2500% | | 2.0200% | | |
| Tuesday | February 14, 2017 | 0.7700% | 1.2500% | | 2.0200% | | |
| Wednesday | February 15, 2017 | 0.7722% | 1.2500% | | 2.0222% | | |
| Thursday | February 16, 2017 | 0.7806% | 1.2500% | | 2.0306% | | |
| Friday | February 17, 2017 | 0.7794% | 1.2500% | | 2.0294% | | |
| Saturday | February 18, 2017 | 0.7794% | 1.2500% | | 2.0294% | | |
| Sunday | February 19, 2017 | 0.7794% | 1.2500% | | 2.0294% | | |
| Monday | February 20, 2017 | 0.7772% | 1.2500% | | 2.0272% | | |
| Tuesday | February 21, 2017 | 0.7794% | 1.2500% | | 2.0294% | | |
| Wednesday | February 22, 2017 | 0.7794% | 1.2500% | | 2.0294% | | |
| Thursday | February 23, 2017 | 0.7783% | 1.2500% | | 2.0283% | | |
| Friday | February 24, 2017 | 0.7806% | 1.2500% | | 2.0306% | | |
| Saturday | February 25, 2017 | 0.7806% | 1.2500% | | 2.0306% | | |
| Sunday | February 26, 2017 | 0.7806% | 1.2500% | | 2.0306% | | |
| Monday | February 27, 2017 | 0.7844% | 1.2500% | | 2.0344% | Average | Monthly Rate |
| Tuesday | February 28, 2017 | 0.7889% | 1.2500% | | 2.0389% | 2.03% | 0.17% |

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 | March 1, 2017 | 0.8106% | 1.2500% | | 2.0606% | | |
| Thursday | March 2, 2017 | 0.8300% | 1.2500% | | 2.0800% | | |
| Friday | March 3, 2017 | 0.8344% | 1.2500% | | 2.0844% | | |
| Saturday | March 4, 2017 | 0.8344% | 1.2500% | | 2.0844% | | |
| Sunday | March 5, 2017 | 0.8344% | 1.2500% | | 2.0844% | | |
| Monday | March 6, 2017 | 0.8467% | 1.2500% | | 2.0967% | | |
| Tuesday | March 7, 2017 | 0.8544% | 1.2500% | | 2.1044% | | |
| Wednesday | March 8, 2017 | 0.8578% | 1.2500% | | 2.1078% | | |
| Thursday | March 9, 2017 | 0.8814% | 1.2500% | | 2.1314% | | |
| Friday | March 10, 2017 | 0.8906% | 1.2500% | | 2.1406% | | |
| Saturday | March 11, 2017 | 0.8906% | 1.2500% | | 2.1406% | | |
| Sunday | March 12, 2017 | 0.8906% | 1.2500% | | 2.1406% | | |
| Monday | March 13, 2017 | 0.9122% | 1.2500% | | 2.1622% | | |
| Tuesday | March 14, 2017 | 0.9283% | 1.2500% | | 2.1783% | | |
| Wednesday | March 15, 2017 | 0.9428% | 1.2500% | | 2.1928% | | |
| Thursday | March 16, 2017 | 0.9783% | 1.2500% | | 2.2283% | | |
| Friday | March 17, 2017 | 0.9761% | 1.2500% | | 2.2261% | | |
| Saturday | March 18, 2017 | 0.9761% | 1.2500% | | 2.2261% | | |
| Sunday | March 19, 2017 | 0.9761% | 1.2500% | | 2.2261% | | |
| Monday | March 20, 2017 | 0.9772% | 1.2500% | | 2.2272% | | |
| Tuesday | March 21, 2017 | 0.9772% | 1.2500% | | 2.2272% | | |
| Wednesday | March 22, 2017 | 0.9839% | 1.2500% | | 2.2339% | | |
| Thursday | March 23, 2017 | 0.9817% | 1.2500% | | 2.2317% | | |
| Friday | March 24, 2017 | 0.9828% | 1.2500% | | 2.2328% | | |
| Saturday | March 25, 2017 | 0.9828% | 1.2500% | | 2.2328% | | |
| Sunday | March 26, 2017 | 0.9828% | 1.2500% | | 2.2328% | | |
| Monday | March 27, 2017 | 0.9822% | 1.2500% | | 2.2322% | | |
| Tuesday | March 28, 2017 | 0.9822% | 1.2500% | | 2.2322% | | |
| Wednesday | March 29, 2017 | 0.9822% | 1.2500% | | 2.2322% | | |
| Thursday | March 30, 2017 | 0.9828% | 1.2500% | | 2.2328% | Average | Monthly Rate |
| Friday | March 31, 2017 | 0.9828% | 1.2500% | | 2.2328% | 2.18% | 0.18% |
| Saturday | April 1, 2017 | 0.9828% | 1.2500% | | 2.2328% | | |
| Sunday | April 2, 2017 | 0.9828% | 1.2500% | | 2.2328% | | |
| Monday | April 3, 2017 | 0.9833% | 1.2500% | | 2.2333% | | |
| Tuesday | April 4, 2017 | 0.9861% | 1.2500% | | 2.2361% | | |
| Wednesday | April 5, 2017 | 0.9856% | 1.2500% | | 2.2356% | | |
| Thursday | April 6, 2017 | 0.9894% | 1.2500% | | 2.2394% | | |
| Friday | April 7, 2017 | 0.9900% | 1.2500% | | 2.2400% | | |
| Saturday | April 8, 2017 | 0.9900% | 1.2500% | | 2.2400% | | |
| Sunday | April 9, 2017 | 0.9900% | 1.2500% | | 2.2400% | | |
| Monday | April 10, 2017 | 0.9883% | 1.2500% | | 2.2383% | | |
| Tuesday | April 11, 2017 | 0.9900% | 1.2500% | | 2.2400% | | |
| Wednesday | April 12, 2017 | 0.9939% | 1.2500% | | 2.2439% | | |
| Thursday | April 13, 2017 | 0.9944% | 1.2500% | | 2.2444% | | |
| Friday | April 14, 2017 | 0.9944% | 1.2500% | | 2.2444% | | |
| Saturday | April 15, 2017 | 0.9944% | 1.2500% | | 2.2444% | | |
| Sunday | April 16, 2017 | 0.9944% | 1.2500% | | 2.2444% | | |
| Monday | April 17, 2017 | 0.9944% | 1.2500% | | 2.2444% | | |
| Tuesday | April 18, 2017 | 0.9928% | 1.2500% | | 2.2428% | | |
| Wednesday | April 19, 2017 | 0.9911% | 1.2500% | | 2.2411% | | |
| Thursday | April 20, 2017 | 0.9883% | 1.2500% | | 2.2383% | | |
| Friday | April 21, 2017 | 0.9906% | 1.2500% | | 2.2406% | | |
| Saturday | April 22, 2017 | 0.9906% | 1.2500% | | 2.2406% | | |
| Sunday | April 23, 2017 | 0.9906% | 1.2500% | | 2.2406% | | |
| Monday | April 24, 2017 | 0.9911% | 1.2500% | | 2.2411% | | |
| Tuesday | April 25, 2017 | 0.9922% | 1.2500% | | 2.2422% | | |
| Wednesday | April 26, 2017 | 0.9928% | 1.2500% | | 2.2428% | | |
| Thursday | April 27, 2017 | 0.9950% | 1.2500% | | 2.2450% | | |
| Friday | April 28, 2017 | 0.9950% | 1.2500% | | 2.2450% | | |
| Saturday | April 29, 2017 | 0.9950% | 1.2500% | | 2.2450% | Average | Monthly Rate |
| Sunday | April 30, 2017 | 0.9950% | 1.2500% | | 2.2450% | 2.24% | 0.19% |

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 | | |
|-----------|---------------|-----------------|-------------------|--------------|------------|----------------|---------------------|
| Monday | May 1, 2017 | 0.9828% | 1.2500% | | 2.2328% | | |
| Tuesday | May 2, 2017 | 0.9928% | 1.2500% | | 2.2428% | | |
| Wednesday | May 3, 2017 | 0.9917% | 1.2500% | | 2.2417% | | |
| Thursday | May 4, 2017 | 0.9928% | 1.2500% | | 2.2428% | | |
| Friday | May 5, 2017 | 0.9944% | 1.2500% | | 2.2444% | | |
| Saturday | May 6, 2017 | 0.9944% | 1.2500% | | 2.2444% | | |
| Sunday | May 7, 2017 | 0.9944% | 1.2500% | | 2.2444% | | |
| Monday | May 8, 2017 | 0.9941% | 1.2500% | | 2.2441% | | |
| Tuesday | May 9, 2017 | 0.9886% | 1.2500% | | 2.2386% | | |
| Wednesday | May 10, 2017 | 0.9886% | 1.2500% | | 2.2386% | | |
| Thursday | May 11, 2017 | 0.9891% | 1.2500% | | 2.2391% | | |
| Friday | May 12, 2017 | 0.9924% | 1.2500% | | 2.2424% | | |
| Saturday | May 13, 2017 | 0.9924% | 1.2500% | | 2.2424% | | |
| Sunday | May 14, 2017 | 0.9924% | 1.2500% | | 2.2424% | | |
| Monday | May 15, 2017 | 1.0008% | 1.2500% | | 2.2508% | | |
| Tuesday | May 16, 2017 | 0.9991% | 1.2500% | | 2.2491% | | |
| Wednesday | May 17, 2017 | 1.0036% | 1.2500% | | 2.2536% | | |
| Thursday | May 18, 2017 | 1.0099% | 1.2500% | | 2.2599% | | |
| Friday | May 19, 2017 | 1.0171% | 1.2500% | | 2.2671% | | |
| Saturday | May 20, 2017 | 1.0171% | 1.2500% | | 2.2671% | | |
| Sunday | May 21, 2017 | 1.0171% | 1.2500% | | 2.2671% | | |
| Monday | May 22, 2017 | 1.0294% | 1.2500% | | 2.2794% | | |
| Tuesday | May 23, 2017 | 1.0236% | 1.2500% | | 2.2736% | | |
| Wednesday | May 24, 2017 | 1.0327% | 1.2500% | | 2.2827% | | |
| Thursday | May 25, 2017 | 1.0438% | 1.2500% | | 2.2938% | | |
| Friday | May 26, 2017 | 1.0447% | 1.2500% | | 2.2947% | | |
| Saturday | May 27, 2017 | 1.0447% | 1.2500% | | 2.2947% | | |
| Sunday | May 28, 2017 | 1.0447% | 1.2500% | | 2.2947% | | |
| Monday | May 29, 2017 | 1.0447% | 1.2500% | | 2.2947% | | |
| Tuesday | May 30, 2017 | 1.0505% | 1.2500% | | 2.3005% | Average | Monthly Rate |
| Wednesday | May 31, 2017 | 1.0603% | 1.2500% | | 2.3103% | 2.26% | 0.19% |
| 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% |

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

4th Accumulation

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

Recovery Period: October 1, 2017 through September 30, 2018

| | KCPL | |
|--|----------------------|------------------------------------|
| 4th Accumulation | \$ 19,947,159 | ER-2018-0036 |
| True-Up Amount (T) | 195,397 | ER-2018-0036 |
| Interest (I) | 618,681 | ER-2018-0036 |
| Prudence Adjustment Amount (P) | - | ER-2018-0036 |
| Fuel and Purchased Power Adjustment (FPA) | 20,761,237 | ER-2018-0036 |
| 4th Accumulation Recovery | (21,273,189) | |
| Proposed Adjustment for (Over)/Under Recovery | \$ (511,952) | |
| Adjustment/Correction to Current Accumulation - 7th Accumulation | - | correction, see 9 (A) 2.B |
| Adjustment/Correction to Current Accumulation - 7th Accumulation | - | correction interest, see 9 (A) 2.B |
| Total Proposed True-Up Amount (T) for 7th Accumulation | \$ (511,952) | |

KCP&L Missouri FAC Accumulation

| | Residential | Commercial | Industrial | Streetlights | Total |
|--------|--------------|--------------|--------------|--------------|----------------------|
| Jan-17 | \$ 1,473,259 | \$ 1,661,412 | \$ 712,328 | \$ 19,900 | \$ 3,866,899 |
| Feb-17 | 1,233,232 | 1,662,170 | 747,180 | 20,403 | 3,662,985 |
| Mar-17 | 1,156,503 | 1,909,694 | 955,179 | 24,374 | 4,045,750 |
| Apr-17 | 757,881 | 1,158,250 | 581,422 | 15,791 | 2,513,344 |
| May-17 | 371,590 | 527,566 | 273,882 | 6,440 | 1,179,478 |
| Jun-17 | 1,851,159 | 1,970,076 | 835,447 | 22,021 | 4,678,703 |
| Total | \$ 6,843,624 | \$ 8,889,167 | \$ 4,105,440 | \$ 108,928 | \$ 19,947,159 |

KCP&L Missouri FAC Recovery

| | Recovery | | | | | | | | | | | | Total |
|--------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|------------|
| Total | Oct-17 | Nov-17 | Dec-17 | Jan-18 | Feb-18 | Mar-18 | Apr-18 | May-18 | Jun-18 | Jul-18 | Aug-18 | Sep-18 | Recovered |
| Residential | 460,007 | 385,868 | 496,642 | 689,822 | 588,239 | 496,441 | 536,288 | 434,052 | 607,446 | 773,764 | 685,755 | 633,917 | 6,788,243 |
| Commercial | 880,832 | 760,498 | 859,149 | 947,937 | 871,225 | 850,164 | 814,267 | 1,004,767 | 917,279 | 1,027,761 | 996,860 | 952,181 | 10,882,922 |
| Industrial | 303,287 | 311,225 | 287,460 | 282,981 | 267,159 | 234,163 | 378,983 | 113,206 | 311,643 | 311,868 | 306,791 | 321,572 | 3,430,338 |
| Streetlights | 13,925 | 14,084 | 14,095 | 13,972 | 14,207 | 14,102 | 15,737 | 9,950 | 18,388 | 14,186 | 14,531 | 14,511 | 171,687 |
| Total | 1,658,051 | 1,471,676 | 1,657,346 | 1,934,712 | 1,740,830 | 1,594,871 | 1,745,275 | 1,561,976 | 1,854,756 | 2,127,579 | 2,003,937 | 1,922,180 | 21,273,189 |

Primary voltage

| | | | | | | | | | | | | | |
|--------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|------------------|
| Commercial | 172,631 | 146,510 | 159,932 | 169,526 | 158,866 | 149,285 | 192,084 | 142,083 | 176,670 | 196,768 | 193,927 | 177,548 | 2,035,830 |
| Industrial | 125,074 | 121,654 | 122,754 | 123,574 | 114,433 | 122,386 | 263,390 | 53,738 | 137,682 | 129,677 | 132,374 | 131,498 | 1,578,235 |
| Total | 297,705 | 268,164 | 282,685 | 293,100 | 273,298 | 271,672 | 455,474 | 195,822 | 314,352 | 326,445 | 326,301 | 309,047 | 3,614,065 |

| | | | | | |
|----------------------|---------|-------|-----------------------|---------|-------|
| Current Period CAF | 0.00240 | 36.1% | Current Period CAF | 0.00244 | 50.4% |
| Previous Period CAF | 0.00425 | 63.9% | Previous Period CAF | 0.00240 | 49.6% |
| Annual CAF | 0.00665 | | Annual CAF | 0.00484 | |
| Current Period CAF % | 36.090% | | Previous Period CAF % | 49.587% | |

Trans/Sub voltage

| | | | | | | | | | | | | | |
|--------------|----------------|----------------|----------------|----------------|----------------|---------------|---------------|--------------|----------------|----------------|----------------|----------------|------------------|
| Commercial | 5,208 | 4,681 | 4,545 | 5,734 | 4,552 | 3,993 | 5,925 | - | 11,327 | 6,262 | 5,626 | 5,255 | 63,108 |
| Industrial | 123,869 | 138,478 | 110,885 | 108,455 | 102,046 | 57,984 | 54,053 | 9,526 | 120,398 | 123,436 | 119,445 | 133,103 | 1,201,677 |
| Total | 129,077 | 143,159 | 115,429 | 114,189 | 106,597 | 61,977 | 59,978 | 9,526 | 131,725 | 129,697 | 125,071 | 138,358 | 1,264,785 |

| | | | | | |
|----------------------|---------|-------|-----------------------|---------|-------|
| Current Period CAF | 0.00234 | 35.5% | Current Period CAF | 0.00238 | 50.4% |
| Previous Period CAF | 0.00425 | 64.5% | Previous Period CAF | 0.00234 | 49.6% |
| Annual CAF | 0.00659 | | Annual CAF | 0.00472 | |
| Current Period CAF % | 35.508% | | Previous Period CAF % | 49.576% | |

Secondary voltage

| | | | | | | | | | | | | | |
|--------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|-------------------|
| Residential | 460,007 | 385,868 | 496,642 | 689,822 | 588,239 | 496,441 | 536,288 | 434,052 | 607,446 | 773,764 | 685,755 | 633,917 | 6,788,243 |
| Commercial | 702,993 | 609,308 | 694,673 | 772,676 | 707,808 | 696,886 | 616,258 | 862,684 | 729,282 | 824,731 | 797,308 | 769,378 | 8,783,984 |
| Industrial | 54,344 | 51,093 | 53,822 | 50,952 | 50,681 | 53,793 | 61,540 | 49,942 | 53,562 | 58,756 | 54,971 | 56,970 | 650,426 |
| Streetlights | 13,925 | 14,084 | 14,095 | 13,972 | 14,207 | 14,102 | 15,737 | 9,950 | 18,388 | 14,186 | 14,531 | 14,511 | 171,687 |
| Total | 1,231,269 | 1,060,353 | 1,259,232 | 1,527,423 | 1,360,934 | 1,261,222 | 1,229,823 | 1,356,628 | 1,408,679 | 1,671,436 | 1,552,565 | 1,474,775 | 16,394,339 |

| | | | | | |
|----------------------|---------|-------|-----------------------|---------|-------|
| Current Period CAF | 0.00246 | 36.1% | Current Period CAF | 0.00249 | 50.3% |
| Previous Period CAF | 0.00436 | 63.9% | Previous Period CAF | 0.00246 | 49.7% |
| Annual CAF | 0.00682 | | Annual CAF | 0.00495 | |
| Current Period CAF % | 36.070% | | Previous Period CAF % | 49.697% | |