

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-2019-0199  
Date Testimony Prepared: December 31, 2018

**MISSOURI PUBLIC SERVICE COMMISSION**

**DIRECT TESTIMONY**

**OF**

**LISA A. STARKEBAUM**



**DIRECT TESTIMONY**

**OF**

**LISA A. STARKEBAUM**

**Case No. ER-2019-0199**

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 KCP&L, GMO and Westar 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 KCP&L, GMO and Westar.

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

1 both MPSC and KCC Staff on numerous filings involving rate case matters and  
2 rider mechanisms.

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

4 A: The purpose of my testimony is to support the 20th true-up filing being made by  
5 GMO under the provisions in 4 CSR 240-20.090(4) and (5) 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: GMO'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 20th 12-month recovery period.

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 current rates is the amount to be recovered  
22 or returned to customers over the recovery period. After the accumulation period,  
23 GMO files with the Commission the Fuel Adjustment Rate ("FAR"). The FAR is

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

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

8 A: The 20<sup>th</sup> accumulation period went from December 2016 through May 2017. The  
9 recovery period for this accumulation was September 2017 through August 2018.  
10 In Schedule LAS-1, you will notice that there are accumulation amounts for MPS  
11 and L&P, but only recovery amounts for GMO. Accumulation amounts were  
12 accounted for under the previous FAC tariffs effective per Case No. ER-2012-  
13 0175, tariff Sheet No's 124-127 through February 21, 2017. Effective February  
14 22, 2017, per Case No. ER-2016-0156, the MPS and L&P rate jurisdictions were  
15 combined into one consolidated GMO rate structure. Therefore, the GMO  
16 recovery amounts cover the 20<sup>th</sup> recovery period of September 2017 through  
17 August 2018. In this filing, individual MPS and L&P designations have been  
18 removed from Schedule LAS-1, the "GMO FAC Balance and Interest" worksheet  
19 as the information is now reflected in total.

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

22 A: The FAR is calculated based upon projected kWh sales for the recovery period.  
23 Since the FAR is based on a projected number, once actual sales are recorded, a

1 difference exists between the estimate and the actual kWh billed. This difference  
2 will be “trued-up” in the next FAC filing.

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

5 A: For this 20<sup>th</sup> accumulation, GMO FAC was over-collected by \$55,005. However;  
6 GMO has identified one correction amounting to \$219,495 which offsets this  
7 amount resulting in a total proposed true-up under-collection of \$164,490. This  
8 correction will be discussed in more detail later in my testimony.

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

10 A: The true-up amount identified in this true-up filing will be included in the next  
11 semi-annual FAC rate schedule filing. Since the Company’s 20th FAC recovery  
12 period ended August 2018, the above under-recovery will be included in the 23rd  
13 accumulation period semi-annual filing to be made on December 31, 2018  
14 covering the accumulation period of June 2018 through November 2018.

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

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

23 **Q: Please summarize the correction included in this filing.**

1 A: In GMO's last semi-annual FAC filing, Case No. ER-2018-0400, an entry was  
2 recorded in the general ledger for steam auxiliary power and was reflected in the  
3 22<sup>nd</sup> accumulation period Actual Net Energy Costs as a reduction to electric fuel  
4 expense. This adjustment was intended to coincide with the allocation  
5 methodology proposed by the Company in GMO's most recent electric rate case,  
6 Case No. ER-2018-0146. However, following discussions with Staff and resulting  
7 settlement negotiations in that case, the Company believes that no additional entry  
8 is necessary for the allocation of auxiliary power. The Company agreed to  
9 continue to utilize the 2016 electric/steam jurisdictional allocation factors from  
10 GMO's previous rate case as proposed by Staff and believes that the allocation of  
11 steam auxiliary power is appropriately handled through the use of these general  
12 allocators used in setting base rates. Therefore, no adjustment for auxiliary power  
13 should be reflected in the FAR filings and as such the Company reversed the  
14 steam auxiliary power entry in August 2018. This correction results in an  
15 increase to electric fuel expense of \$217,687 plus additional interest of \$1,809.

16 **Q: How will this corrected be corrected?**

17 A: The correction as well as the associated interest has been included in this true-up  
18 calculation and will be included in the 23<sup>rd</sup> accumulation period semi-annual  
19 filing made concurrent with this filing. Schedule LAS-1 includes the detail for the  
20 correction and interest amount.

21 **Q: Are there any additional adjustments included in this true-up filing?**

22 A: No.



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(5), a true-up filing is required at least  
4 annually. Pursuant to the Company's FAC tariff, the amount of the true-up will  
5 be included in the next accumulation period. The Company requests that the  
6 Commission approve the amount to be included in the 23<sup>rd</sup> accumulation period  
7 which will cover the six months ended November 2018.

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

9 A: Yes, it does.

**Information Required By  
4 CSR 240-3.161 (8)  
Annual True-up of FAC for KCP&L GMO  
Summary**

**20th Accumulation**

**Accumulation Period: December 1, 2016 through May 31, 2017**

**Recovery Period: September 1, 2017 through August 31, 2018**

	<u>MPS</u>	<u>L&amp;P</u>	<u>GMO</u>	<u>Total</u>	
<b>20th Accumulation</b>	\$ 1,320,237	\$ (524,134)	\$ 1,248,128	\$ 2,044,231	
Interest Filed			(67,140)	(67,140)	
17th True-up (T) Amount			(57,081)	(57,081)	
Adj/Corr included in 20th Accumulation				-	
20th Accumulation Recovery			(1,975,016)	(1,975,016)	
Proposed Adjustment for (Over)/Under Recovery				\$ (55,005)	
Adjustment/Correction to Current Accumulation - 23rd Accumulation				217,687	correction
Adjustment/Correction to Current Accumulation - 23rd Accumulation				1,809	correction interest
<b>Total Proposed True-Up Amount (T) for 23rd Accumulation</b>				<b>\$ 164,490</b>	

**Short-Term Borrowing Rate:**

	Annual	Monthly
Dec-16	1.9638%	0.16%
Jan-17	2.0214%	0.17%
Feb-17	2.0267%	0.17%
Mar-17	2.1767%	0.18%
Apr-17	2.2408%	0.19%
May-17	2.2618%	0.19%

**MPS Accumulation**

	<b>Residential</b>	<b>Commercial</b>	<b>Industrial</b>	<b>Streetlights</b>	<b>Gov't-Other</b>	<b>Total Retail</b>	<b>Wholesale</b>	<b>Total</b>
<b>Dec-16</b>	604,580	387,397	113,306	3,960	66,973	1,176,216	4,978	1,181,193
<b>Jan-17</b>	89,475	58,783	19,317	553	10,361	178,489	1,305	179,794
<b>Feb-17</b>	(15,431)	(12,338)	(4,272)	(157)	(2,270)	(34,469)	(235)	(34,703)
*								0
*								0
*								0
<b>Total</b>	<b>\$ 678,624</b>	<b>\$ 433,842</b>	<b>\$ 128,351</b>	<b>\$ 4,356</b>	<b>\$ 75,064</b>	<b>\$ 1,320,237</b>	<b>\$ 6,048</b>	<b>\$ 1,326,285</b>

\*The consolidation of the MPS and L&P rate districts was established as ordered by the Commission in Rate Case No. ER-2016-0156, effective February 22,2017.

		<b>Secondary</b>	<b>Primary</b>	
NSI by Voltage	1,475,052,250	1,291,677,981	183,374,269	
Secondary/Primary Distribution		87.57%	12.43%	
Accumulation by Voltage		\$ 1,161,404.67	\$ 164,879.90	<b>\$ 1,326,285</b>

Base Energy by Voltage Level :

CIS+ Secondary Customers	1,212,511,032
CIS+ Primary Customers - MO716	110,640
CIS+ Primary Customers - MO725	9,850,060
CIS+ Primary Customers - MO735	147,597,788
CIS+ Primary Customers - MO737	<u>4,814,695</u>
<b>Total CIS+</b>	<b>1,374,884,215</b>
Total Wholesale Billings (Primary)	8,254,913
Other kWh (unbilled, co use, losses)	<u>91,913,122</u>
<b>Total kWh</b>	<b>1,475,052,250</b>

**L&P Accumulation**

	<b>Residential</b>	<b>Commercial</b>	<b>Industrial</b>	<b>Streetlights</b>	<b>Gov't-Other</b>	<b>Total Retail</b>
<b>Dec-16</b>	\$ (10,913)	\$ (7,651)	\$ (5,817)	\$ (119)	-	\$ (24,501)
<b>Jan-17</b>	(175,941)	(135,622)	(101,648)	(1,939)	-	(415,151)
<b>Feb-17</b>	(30,974)	(29,537)	(23,529)	(443)	-	(84,482)
*						-
*						-
*						-
<b>Total</b>	<b>\$ (217,829)</b>	<b>\$ (172,810)</b>	<b>\$ (130,993)</b>	<b>\$ (2,501)</b>	<b>-</b>	<b>\$ (524,134)</b>

\*The consolidation of the MPS and L&P rate districts was established as ordered by the Commission in Rate Case No. ER-2016-0156, effective February 22,2017.

	<b>Secondary</b>	<b>Primary</b>	
NSI by Voltage	560,451,000	504,187,726	56,263,274
Secondary/Primary Distribution		89.96%	10.04%
Accumulation by Voltage	(471,516)	(52,617)	<b>(524,134)</b>

Base Energy by Voltage Level:

CIS+ Secondary Customers	466,169,038
CIS+ Primary Customers - MO938	2,528,798
CIS+ Primary Customers - MO939	14,040
CIS+ Primary Customers - MO945	23,078,644
CIS+ Primary Customers - MO946	18,922,497
CIS+ Primary Customers - MO947	<u>9,066,788</u>
<b>Total CIS+ (CS5005Y)</b>	<b>519,779,805</b>
Other kWh (unbilled, co use, losses)	<u>40,671,195</u>
<b>Total kwh</b>	<b>560,451,000</b>

**GMO Accumulation**

	Residential	Commercial	Industrial	Streetlights	Gov't-Other	Total Retail	Wholesale	Total
* *								
<b>Feb-17</b>	\$ 175,884	\$ 147,123	\$ 69,063	\$ 1,963	\$ 19,667	\$ 413,700	\$ 2,032	\$ 415,732
<b>Mar-17</b>	43,803	40,977	21,224	468	4,936	111,408	267	111,675
<b>Apr-17</b>	681,655	736,414	377,365	9,154	94,899	1,899,486	7,954	1,907,440
<b>May-17</b>	(443,719)	(461,521)	(200,949)	(5,014)	(65,263)	(1,176,466)	(3,373)	(1,179,839)
<b>Total</b>	<b>\$ 457,623</b>	<b>\$ 462,993</b>	<b>\$ 266,703</b>	<b>\$ 6,571</b>	<b>\$ 54,238</b>	<b>\$ 1,248,128</b>	<b>\$ 6,880</b>	<b>\$ 1,255,008</b>

\*The consolidation of the MPS and L&P rate districts was established as ordered by the Commission in Rate Case No. ER-2016-0156, effective February 22,2017.

		Secondary	Primary	
NSI by Voltage	2,015,060,750	1,726,896,483	288,164,267	
Secondary/Primary Distribution		85.70%	14.30%	
Accumulation by Voltage		\$ 1,075,535.23	\$ 179,472.73	\$ <b>1,255,008</b>

Base Energy by Voltage Level :

CIS+ Secondary Customers	1,584,678,150
CIS+ Primary Customers - MO737	7,090,050
CIS+ Primary Customers - MO938	354,503
CIS+ Primary Customers - MO945	3,120,362
CIS+ Primary Customers - MO947	(23,316)
CIS+ Primary Customers - MOLGP	38,008,491
CIS+ Primary Customers - MOLNP	554,400
CIS+ Primary Customers - MOPGP	208,510,153
CIS+ Primary Customers - MOPNP	-
CIS+ Primary Customers - MOSGP	493,922
CIS+ Primary Customers - MOSNP	-
<b>Total CIS+</b>	<b>1,842,786,715</b>
Total Wholesale Billings (Primary)	6,137,555
Other kWh (unbilled, co use, losses)	166,136,480
<b>Total kwh</b>	<b>2,015,060,750</b>

**KCP&L GMO Recovery**

<b>Total</b>	<b>Recovery</b>												<b>Total Recovered</b>
	<b>Sep-17</b>	<b>Oct-17</b>	<b>Nov-17</b>	<b>Dec-17</b>	<b>Jan-18</b>	<b>Feb-18</b>	<b>Mar-18</b>	<b>Apr-18</b>	<b>May-18</b>	<b>Jun-18</b>	<b>Jul-18</b>	<b>Aug-18</b>	
Residential	(68,252)	(61,553)	(55,368)	(64,018)	(99,151)	(79,845)	(68,295)	(67,349)	(55,201)	(81,094)	(97,172)	(86,715)	(884,014)
Commercial	(61,325)	(61,693)	(52,246)	(54,362)	(65,608)	(53,559)	(60,351)	(62,297)	(62,254)	(71,774)	(76,650)	(76,682)	(758,800)
Industrial	(20,457)	(27,621)	(23,632)	(22,480)	(24,773)	(21,336)	(23,166)	(24,395)	(26,262)	(25,843)	(27,083)	(27,020)	(294,069)
Gov't-Other	(6,942)	(7,068)	(5,798)	(5,925)	(6,493)	(5,917)	5	5	1	-	-	-	(38,133)
<b>Total</b>	<b>(156,976)</b>	<b>(157,935)</b>	<b>(137,044)</b>	<b>(146,785)</b>	<b>(196,024)</b>	<b>(160,658)</b>	<b>(151,808)</b>	<b>(154,035)</b>	<b>(143,716)</b>	<b>(178,712)</b>	<b>(200,905)</b>	<b>(190,418)</b>	<b>(1,975,016)</b>

**Primary voltage**

Commercial	(9,405)	(9,833)	(8,041)	(8,790)	(9,555)	(7,504)	(8,231)	(8,650)	(9,601)	(10,697)	(11,664)	(11,940)	(113,911)
Industrial	(11,210)	(10,696)	(10,547)	(9,682)	(10,013)	(9,275)	(9,458)	(10,402)	(11,432)	(10,795)	(11,259)	(12,022)	(126,791)
Gov't-Other	(896)	(839)	(572)	(478)	(506)	(474)	(451)	(497)	(81)	-	-	-	(4,794)
<b>Total</b>	<b>(21,511)</b>	<b>(21,367)</b>	<b>(19,160)</b>	<b>(18,950)</b>	<b>(20,074)</b>	<b>(17,253)</b>	<b>(18,140)</b>	<b>(19,548)</b>	<b>(21,115)</b>	<b>(21,492)</b>	<b>(22,923)</b>	<b>(23,962)</b>	<b>(245,496)</b>

Current Period CAF	0.00023	51.11%	Current Period CAF	0.00099	81.1%
Previous Period CAF	0.00022	48.89%	Previous Period CAF	0.00023	18.9%
Annual CAF	0.00045		Annual CAF	0.00122	
Previous Period CAF %	51.11%		Previous Period CAF %	18.85%	

**Secondary voltage**

Residential	(68,252)	(61,553)	(55,368)	(64,018)	(99,151)	(79,845)	(68,295)	(67,349)	(55,201)	(81,094)	(97,172)	(86,715)	(884,014)
Commercial	(51,920)	(51,860)	(44,205)	(45,572)	(56,053)	(46,055)	(52,120)	(53,647)	(52,652)	(61,077)	(64,986)	(64,742)	(644,889)
Industrial	(9,247)	(16,925)	(13,085)	(12,798)	(14,759)	(12,061)	(13,708)	(13,993)	(14,830)	(15,048)	(15,824)	(14,999)	(167,278)
Gov't-Other	(6,046)	(6,229)	(5,226)	(5,447)	(5,987)	(5,443)	455	502	82	-	-	-	(33,340)
<b>Total</b>	<b>(135,465)</b>	<b>(136,568)</b>	<b>(117,884)</b>	<b>(127,835)</b>	<b>(175,950)</b>	<b>(143,404)</b>	<b>(133,668)</b>	<b>(134,487)</b>	<b>(122,601)</b>	<b>(157,219)</b>	<b>(177,982)</b>	<b>(166,456)</b>	<b>(1,729,520)</b>

Current Period CAF	0.00024	52.17%	Current Period CAF	0.00102	81.0%
Previous Period CAF	0.00022	47.83%	Previous Period CAF	0.00024	19.0%
Annual CAF	0.00046		Annual CAF	0.00126	
Previous Period CAF %	52.17%		Previous Period CAF %	19.05%	

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

KCP&L GMO FAC BALANCE BY RECOVERY PERIOD WITH INTEREST CALCULATION	Dec-16	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17
	←		<b>20th Accumulation period</b>			→		<b>Filing and Approval</b>		←		
<b>20th Accumulation</b>	<b>Dec-16</b>	<b>Jan-17</b>	<b>Feb-17</b>	<b>Mar-17</b>	<b>Apr-17</b>	<b>May-17</b>	<b>Jun-17</b>	<b>Jul-17</b>	<b>Aug-17</b>	<b>Sep-17</b>	<b>Oct-17</b>	<b>Nov-17</b>
(Over)/Under Adjustment from 17th Accum			<b>(57,080.65)</b>									
C/M (Over)/Under Accrued	1,151,715.11	(236,661.27)	294,749.02	111,408.18	1,899,486.19	(1,176,466.42)				156,976.29	157,935.03	137,044.16
C/M (Over)/Under Recovery	-	-	-	-	-	-						
CUMM (Over)/Under Balance	1,151,715	915,054	1,152,722	1,264,130	3,163,617	1,987,150	1,920,010	1,920,010	1,920,010	1,763,034	1,605,099	1,468,055
Monthly Short Term Debt Rate rate	<b>0.16%</b>	<b>0.17%</b>	<b>0.17%</b>	<b>0.18%</b>	<b>0.19%</b>	<b>0.19%</b>						
C/M Accrued interest (P/M Bal)	(18,157.70)	(14,929.04)	(12,533.99)	(10,372.16)	(8,303.94)	(2,843.13)						
CUMM Accrued Interest Balance	(18,158)	(33,087)	(45,621)	(55,993)	(64,297)	(67,140)						
							←		<b>21st Accumulation period</b>			→
<b>21st Accumulation</b>							<b>Jun-17</b>	<b>Jul-17</b>	<b>Aug-17</b>	<b>Sep-17</b>	<b>Oct-17</b>	<b>Nov-17</b>
(Over)/Under Adjustment from 18th Accum									<b>(546,582.91)</b>			
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
C/M (Over)/Under Recovery							-	-	-	-	-	-
CUMM (Over)/Under Balance							1,309,250	4,872,098	5,676,385	7,136,049	7,273,426	8,246,583
Monthly Short Term Debt Rate rate							<b>0.20%</b>	<b>0.21%</b>	<b>0.21%</b>	<b>0.21%</b>	<b>0.21%</b>	<b>0.21%</b>
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
<b>22nd Accumulation</b>												
(Over)/Under Adjustment from 19th 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												
<b>23rd Accumulation</b>												
(Over)/Under Adjustment from 20th Accum												
C/M (Over)/Under Accrued												
C/M (Over)/Under Recovery												
CUMM (Over)/Under Balance												
Correction Steam Aux reversal												
Monthly Short Term Debt Rate rate												
C/M Accrued interest (P/M Bal)												
CUMM Accrued Interest Balance												

**KCP&L GMO  
FAC BALANCE BY RECOVERY PERIOD  
WITH INTEREST CALCULATION**

	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	
<b>20th Accumulation</b>			<b>Recovery Period</b> →										
(Over)/Under Adjustment from 17th Accum	<b>Dec-17</b>	<b>Jan-18</b>	<b>Feb-18</b>	<b>Mar-18</b>	<b>Apr-18</b>	<b>May-18</b>	<b>Jun-18</b>	<b>Jul-18</b>	<b>Aug-18</b>				
C/M (Over)/Under Accrued													
C/M (Over)/Under Recovery	146,785.18	196,023.81	160,657.60	151,808.00	154,035.27	143,715.79	178,711.55	200,905.36	190,417.62				
CUMM (Over)/Under Balance	1,321,270	1,125,246	964,588	812,780	658,745	515,029	336,318	135,412	(55,005)				
Monthly Short Term Debt Rate rate													
C/M Accrued interest (P/M Bal)													
CUMM Accrued Interest Balance													
<b>21st Accumulation</b>	<b>Filing and Approval</b>				<b>Recovery Period</b> →								
(Over)/Under Adjustment from 18th Accum	<b>Dec-17</b>	<b>Jan-18</b>	<b>Feb-18</b>	<b>Mar-18</b>	<b>Apr-18</b>	<b>May-18</b>	<b>Jun-18</b>	<b>Jul-18</b>	<b>Aug-18</b>	<b>Sep-18</b>	<b>Oct-18</b>	<b>Nov-18</b>	
C/M (Over)/Under Accrued													
C/M (Over)/Under Recovery				646,169.83	655,712.31	611,939.63	760,692.16	855,093.61	810,577.18	751,975.39	641,685.15	612,890.19	
CUMM (Over)/Under Balance	8,315,398	8,315,398	8,315,398	7,669,228	7,013,516	6,401,576	5,640,884	4,785,791	3,975,214	3,223,238	2,581,553	1,968,663	
Monthly Short Term Debt Rate rate													
C/M Accrued interest (P/M Bal)													
CUMM Accrued Interest Balance													
<b>22nd Accumulation</b>			<b>22nd Accumulation period</b>				<b>Filing and Approval</b>		<b>Recovery Period</b> →				
(Over)/Under Adjustment from 19th Accum	<b>Dec-17</b>	<b>Jan-18</b>	<b>Feb-18</b>	<b>Mar-18</b>	<b>Apr-18</b>	<b>May-18</b>	<b>Jun-18</b>	<b>Jul-18</b>	<b>Aug-18</b>	<b>Sep-18</b>	<b>Oct-18</b>	<b>Nov-18</b>	
C/M (Over)/Under Accrued			<b>136,956.99</b>										
C/M (Over)/Under Recovery	1,894,246.88	3,753,713.17	1,287,281.40	957,373.18	2,466,342.34	649,398.06							
CUMM (Over)/Under Balance	1,894,247	5,647,960	7,072,198	8,029,572	10,495,914	11,145,312	11,366,822	11,366,822	11,366,822	1,017,429.79	868,217.56	829,254.92	
Monthly Short Term Debt Rate rate	<b>0.23%</b>	<b>0.23%</b>	<b>0.24%</b>	<b>0.25%</b>	<b>0.26%</b>	<b>0.27%</b>							
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							
<b>23rd Accumulation</b>							<b>23rd Accumulation period</b>						
(Over)/Under Adjustment from 20th Accum							<b>Jun-18</b>	<b>Jul-18</b>	<b>Aug-18</b>	<b>Sep-18</b>	<b>Oct-18</b>	<b>Nov-18</b>	
C/M (Over)/Under Accrued									<b>(55,005.47)</b>				
C/M (Over)/Under Recovery							6,609,264.17	5,371,272.67	2,143,448.20	1,285,549.99	4,348,592.70	9,457,585.96	
CUMM (Over)/Under Balance							6,609,264	11,980,537	14,288,475	15,574,025	19,922,617	29,380,203	
Correction Steam Aux reversal									219,495				
Monthly Short Term Debt Rate rate							<b>0.28%</b>	<b>0.28%</b>	<b>0.28%</b>	<b>0.29%</b>	<b>0.30%</b>	<b>0.30%</b>	
C/M Accrued interest (P/M Bal)							49,971.31	66,470.37	78,209.69	84,693.88	85,982.63	95,156.40	
CUMM Accrued Interest Balance							49,971	116,442	194,651	279,345	365,328	460,484	



**KCP&L GMO**  
**Correction for Steam Aux reversal**

Steam Aux credit included in the 22nd Accumulation, ER-2018-0400

Included as credit in May 2018		\$	(229,811.78)
Less 5%		\$	11,490.59
Less Muni from May 2018	0.29%	\$	634.60
		\$	<u>(217,686.59)</u>

**Reversed in August 2018** **\$ 217,686.59**

Interest calculated on previous month balance			
June 2018 interest	0.28%	\$	602.27
July 2018 interest	0.28%	\$	604.08
August 2018 interest	0.28%	\$	602.27
Correction interest total		\$	<u>1,808.61</u>

**Total Correction for Steam Aux reversal** **\$ 219,495.20**

**Kansas City Power & Light Company - GMO**  
**Short Term Debt Rate**

Day	Date	One Month LIBOR	Applicable Margin	Upfront Fees	Daily Rate		
Thursday	December 1, 2016	0.6345%	1.2500%		1.8845%		
Friday	December 2, 2016	0.6467%	1.2500%		1.8967%		
Saturday	December 3, 2016	0.6467%	1.2500%		1.8967%		
Sunday	December 4, 2016	0.6467%	1.2500%		1.8967%		
Monday	December 5, 2016	0.6519%	1.2500%		1.9019%		
Tuesday	December 6, 2016	0.6489%	1.2500%		1.8989%		
Wednesday	December 7, 2016	0.6542%	1.2500%		1.9042%		
Thursday	December 8, 2016	0.6639%	1.2500%		1.9139%		
Friday	December 9, 2016	0.6800%	1.2500%		1.9300%		
Saturday	December 10, 2016	0.6800%	1.2500%		1.9300%		
Sunday	December 11, 2016	0.6800%	1.2500%		1.9300%		
Monday	December 12, 2016	0.6947%	1.2500%		1.9447%		
Tuesday	December 13, 2016	0.7039%	1.2500%		1.9539%		
Wednesday	December 14, 2016	0.7073%	1.2500%		1.9573%		
Thursday	December 15, 2016	0.7362%	1.2500%		1.9862%		
Friday	December 16, 2016	0.7390%	1.2500%		1.9890%		
Saturday	December 17, 2016	0.7390%	1.2500%		1.9890%		
Sunday	December 18, 2016	0.7390%	1.2500%		1.9890%		
Monday	December 19, 2016	0.7440%	1.2500%		1.9940%		
Tuesday	December 20, 2016	0.7490%	1.2500%		1.9990%		
Wednesday	December 21, 2016	0.7550%	1.2500%		2.0050%		
Thursday	December 22, 2016	0.7561%	1.2500%		2.0061%		
Friday	December 23, 2016	0.7611%	1.2500%		2.0111%		
Saturday	December 24, 2016	0.7611%	1.2500%		2.0111%		
Sunday	December 25, 2016	0.7611%	1.2500%		2.0111%		
Monday	December 26, 2016	0.7611%	1.2500%		2.0111%		
Tuesday	December 27, 2016	0.7611%	1.2500%		2.0111%		
Wednesday	December 28, 2016	0.7700%	1.2500%		2.0200%		
Thursday	December 29, 2016	0.7111%	1.2500%		1.9611%		
Friday	December 30, 2016	0.7717%	1.2500%		2.0217%	<b>Average</b>	<b>Monthly Rate</b>
Saturday	December 31, 2016	0.7717%	1.2500%		2.0217%	1.9638%	0.16%
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%	<b>Average</b>	<b>Monthly Rate</b>
Tuesday	January 31, 2017	0.7794%	1.2500%		2.0294%	2.0214%	0.17%

**Kansas City Power & Light Company - GMO**  
**Short Term Debt Rate**

Day	Date	One Month LIBOR	Applicable Margin	Upfront Fees	Daily Rate		
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%	<b>Average</b>	<b>Monthly Rate</b>
Tuesday	February 28, 2017	0.7889%	1.2500%		2.0389%	2.0267%	0.17%
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%	<b>Average</b>	<b>Monthly Rate</b>
Friday	March 31, 2017	0.9828%	1.2500%		2.2328%	2.1767%	0.18%

**Kansas City Power & Light Company - GMO**  
**Short Term Debt Rate**

Day	Date	One Month LIBOR	Applicable Margin	Upfront Fees	Daily Rate		
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%	<b>Average</b>	<b>Monthly Rate</b>
Sunday	April 30, 2017	0.9950%	1.2500%		2.2450%	2.2408%	0.19%
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%	<b>Average</b>	<b>Monthly Rate</b>
Wednesday	May 31, 2017	1.0603%	1.2500%		2.3103%	2.2618%	0.19%