BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power &)	
Light Company's Request for Authority to)	Case No. ER-2014-0370
Implement a General Rate Increase for)	
Electric Service.)	

OFFICE OF THE PUBLIC COUNSEL'S OBJECTION AND RESPONSE TO KCPL'S RATE CASE EXPENSE UPDATE

COMES NOW the Office of the Public Counsel (OPC or Public Counsel) and for its objection to Kansas City Power & Light Company's (KCPL or Company) Rate Case Expense Update states as follows:

- 1. On August 12th, 2015, KCPL filed a two-page document which wrongly reargues its substantive positions regarding resolution of the rate case expense issues. In support of its "update," KCPL provides a one-page document consisting solely of a table of highly generalized information purporting to show rate case expenses incurred through August 12, 2015.
- 2. The Midwest Energy Consumers Group (MECG) has provided its response to KCPL's update (Doc. No. 567). OPC concurs with the substance of MECG's response and adopts the positions articulated therein as its own.
- 3. To the extent necessary, OPC reasserts its positions with respect to rate case expenses in this case as previously set forth in its statement of positions, at hearing, at true-up, and in the post-hearing briefing.
- 4. Consistent with OPC's positions, which include:
 - disallowances for duplicative and unnecessary services,
 - reductions in excessive attorney hourly rates,
 - disallowance for a recently-disclosed over-budget contract for services, and

- 50/50 expense sharing,

OPC offers the attached highly confidential accounting schedule created by OPC witness William Addo. Exhibit A.

5. OPC concludes that the total normalized amount of rate case expense to be included into rates in this case should be \$104,655.15.

WHEREFORE, OPC offers the foregoing Objection and Response to KCPL's Rate Case Expense Update.

Respectfully submitted,

By: /s/ Dustin Allison

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 14th day of August 2015.

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/s/ Dustin Allison

ER-2014-0370

Exhibit A
has been deemed
"Highly Confidential"
in its entirety.

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AFFIDAVIT OF WILLIAM ADDO

STATE OF MISSOURI)	
)	SS
COUNTY OF COLE)	

William Addo, of lawful age and being first duly sworn, deposed and states:

- 1. My name is William Addo. I am a Public Utility Accountant I for the Office of the Public Counsel.
- 2. I hereby swear and affirm that the statements contained in the attached report are true and correct to the best of my knowledge and belief.

William Addo

Public Utility Accountant II

Subscribed and sworn to me this 14th day of August 2015.

NOTARY SEAL STOP MISS

JERENE A. BUCKMAN My Commission Expires August 23, 2017 Cole County Commission #13754037

Jerene A. Buckman Notary Public

My Commission expires August 23, 2017.