

MEMORANDUM

TO: Missouri Public Service Commission Official Case Files

Case No. ER-2018-0145, Tariff Tracking Nos. YE-2019-0084 and YE-2019-0083, In the Matter of the Application of Kansas City Power & Light Company’s Request for Authority to Implement a General Rate Increase for Electric Service;

and

Case No. ER-2018-0146, Tariff Tracking No. YE-2019-0085, In the Matter of KCP&L Greater Missouri Operations Company’s Request for Authority to Implement a General Rate Increase for Electric Service

FROM: Claire M. Eubanks, Engineering Analysis
Cedric Cunigan, Engineering Analysis
Sarah L.K. Lange, Tariff & Rate Design
Robin Kliethermes, Tariff & Rate Design
Brooke Mastrogiannis, Energy Resource Analysis

/s/ Natelle Dietrich / November 16, 2018 /s/ Nicole Mers / November 16, 2018
Director, Commission Staff Division Deputy Staff Counsel

SUBJECT: Recommendation to Accept Tariff Sheets as Compliant, and to Approve Tariff Sheets Not Inconsistent with Order

DATE: November 16, 2018

DISCUSSION

On September 19, 2018, Kansas City Power & Light Company (“KCP&L”), KCP&L Greater Missouri Operations Company (“GMO”), the Staff of the Commission (“Staff”), Missouri Energy Consumers Group (“MECG”), The Missouri Department of Economic Development – Division of Energy (“DE”), Missouri Industrial Energy Consumers (“MIEC”), Missouri Joint Municipal Electric Utility Cooperatives (“MJMEUC”), and Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”) filed a Non-Unanimous Partial Stipulation and Agreement

resolving revenue requirement issues (“First Stipulation”). The First Stipulation established the revenue requirements and billing determinants upon which rates would be based.

On September 25, KCP&L, GMO, Staff, the Office of the Public Counsel (“OPC”), Advanced Energy Management Alliance (“AEMA”), DE, MJMEUC, and Renew Missouri filed a Non-Unanimous Stipulation and Agreement Concerning Rate Design Issues (“Third Stipulation”). The Third Stipulation resolved issues related to residential rate design, the proposed restoration charge, the special contract tariff, the real time pricing and two part time of use tariff, the underutilized infrastructure tariff, the renewable energy rider, the solar subscription rider, the standby service rider, the GMO large power off peak rider, the GMO primary discount rider, and GMO and KCPL lighting schedules. The Third Stipulation also included, as attachments, specimen tariff sheets for the Underutilized Infrastructure Rider, Renewable Energy Rider, Solar Subscription Pilot Rider, and Standby Service Rider. The Third Stipulation included a provision stating, in pertinent part,

Effective October 1, 2019, KCP&L and GMO will offer a residential Time of Use Service, originally proposed^[fn] as pilot by the Company in this case, as an opt-in rate that would be available as an alternative to standard residential rates, which shall continue to be available.

[fn] The Signatories use the phrase, ‘originally proposed,’ for the purpose of identifying the residential TOU pilot; however, the use of this phrase does not include, and specifically excludes, the KCP&L and GMO’s proposals relating to combining TOU with MEEIA.

On September 27, KCP&L, GMO, Staff, OPC, MECG, DE, MIEC, MJMEUC, and Renew Missouri filed a Non-Unanimous Stipulation and Agreement Regarding Class Revenue Shifts (“Fourth Stipulation”). The Fourth Stipulation also reduced the KCPL revenue requirement established by the First Stipulation.

On October 31, the Commission issued its Order Approving Stipulations and Agreements, with an effective date of November 10, in which it (1) approved four stipulations and agreements,¹ (2) rejected the tariff sheets assigned tariff tracking numbers YE-2018-0095, YE-2019-0096, and YE-2018-0097, (3) ordered KCPL and GMO to file compliance tariffs no later than November 6, 2018, and (4) directed the Staff to file its recommendation concerning the compliance tariff filings no later than November 9, 2018.

On November 6, 2018, KCPL filed 114 tariff sheets in tariff tracking number YE-2019-0084, and 11 tariff sheets in tariff tracking number YE-2019-0083, and GMO filed 122 tariff sheets in tariff tracking number YE-2019-0085. On November 9, KPCL substituted 45 sheets in tariff tracking number YE-2019-0084, and withdrew 4 sheets previously submitted in tariff tracking number YE-2019-0083, and GMO substituted 23 sheets in tariff tracking number YE-2019-0085, and withdrew one tariff sheet previously submitted in tariff tracking number YE-2019-0085. On November 16, KCPL substituted 47 sheets in tariff tracking number YE-2019-0084 and GMO substituted 26 sheets in tariff tracking number YE-2019-0085.

KCPL and GMO also filed tariff sheets to update the MEEIA margin rates to reflect the changes in rates effectuated by these cases.

Certain tariff sheets submitted in the compliance filing vary from those referenced in the Third Stipulation or attached to the Third Stipulation as specimen tariffs, however, Staff recommends

¹ A Non-Unanimous Stipulation and Agreement Regarding Pensions and Other Post-Employment Benefits was filed on September 21, 2018.

the Commission accept as compliant the tariff sheets submitted to effectuate the agreements contained in the body of the Third Stipulation, or allow them to take effect by operation of law.

The tariff sheets filed to effectuate the Underutilized Infrastructure Rider, Renewable Energy Rider, and Solar Subscription Pilot Rider differ from the specimen tariffs attached to the Third Stipulation in certain respects. The compliance Underutilized Infrastructure Rider sheets include additional areas specific to each utility, as was contemplated by the Third Stipulation. The compliance Renewable Energy Rider and Solar Subscription Pilot Rider tariff sheets comply with the Third Stipulation, however, there were certain inconsistencies and omissions between the agreements contained in the body of the Third Stipulation and the provisions of the specimen tariff sheets attached to the Third Stipulation. For clarity and transparency, each of these items is noted below.

Renewable Energy Rider

- KCPL Sheet 40 and GMO Sheet 139, language in the availability section was changed to include the enrollment process described in the direct testimony of MECCG witness Steve Chriss. Third Stipulation paragraph 10.h. regarding program changes.
- KCPL Sheet 40F and GMO Sheet 139.6, item 10 under Program Provisions and Special Terms is deleted to remove general ratepayer obligations for unsubscribed portions of the renewable resource. Third Stipulation paragraph 10.d. regarding ownership of unsubscribed capacity.
- KCPL Sheet 40C and GMO Sheet 139.2, language is changed to limit the maximum capacity of the renewable resource to 200 MW. Third Stipulation paragraph 10.a. regarding PPA limits.

Solar Subscription Pilot Rider

- KCPL Sheet 39 and GMO Sheet 109, paragraph 2 under the Purpose section clarifies that a maximum of approximately 10,000 solar blocks will be available for subscription. Third Stipulation Paragraph 11.f. regarding updates to add new jurisdictional terms.
- KCPL Sheet 39 and GMO Sheet 109, paragraph 3 under the Purpose section adds the sentence “KCP&L-Missouri and GMO will combine the subscription requirements in

sizing the solar resource.” Third Stipulation Paragraph 11.f. regarding updates to add new jurisdictional terms.

- KCPL Sheet 39 and GMO Sheet 109, paragraph 2 under the Availability section adds the language “Service under this Rider will be limited to the Solar Blocks available to the jurisdiction, as described in the Purpose section.” Third Stipulation Paragraph 11.f. regarding updates to add new jurisdictional terms.
- KCPL Sheet 39A and GMO Sheet 109.1, updated the rate, notes the rate is based on an engineering estimate, and includes a not to exceed amount per kWh. Third Stipulation Paragraph 11.f. regarding removing the Levelized Cost of Energy, update to block charge, not to exceed value, and the project to be selected through a competitive RFP process.
- KCPL Sheet 39A and GMO Sheet 109.1, paragraph 2 under subscription level is an addition regarding the monthly recalculation of subscription levels. Third Stipulation Paragraph 11.f. regarding updates to add new jurisdictional terms.
- KCPL Sheet 39D and GMO Sheet 109.4, item number 2 under Program Provisions and Special Terms revised to include that the Company will retain RECs associated with unsubscribed allocations. Third Stipulation Paragraph 11.f. regarding updates to add new jurisdictional terms.

Certain tariff sheets submitted in the compliance filing vary from those attached to the Third Stipulation as specimen tariffs or referenced in the Third Stipulation, however, Staff recommends the Commission approve these tariff sheets as not inconsistent with the Third Stipulation and the Commission Order, or allow them to take effect by operation of law.

Residential Time of Use Rates

- KCPL Sheet 7A and GMO Sheet 146.6 define the names of time periods for purposes of the time of use rate.
 - The pricing periods contained in the referenced tariff sheet originally proposed as a pilot by the Company are as follows:

PRICING PERIODS

Pricing periods are established in Central Standard Time annually, and by season, for weekdays and weekends. The hours of the pricing periods for each season are as follows:

On-Peak: 4pm-8pm
Off-Peak: 8pm-12am
Super Off-Peak: 12am-6am

- The pricing periods contained in the compliance tariff filing, as substituted, are as follows:

PRICING PERIODS

Pricing periods are established in Central Time year-round. The hours of the pricing period for each season are as follows:

On-Peak: 4pm-8pm, Monday through Friday
Super Off-Peak: 12am-6am every day
Off-Peak: All other hours

- These originally proposed time periods do not define a name for the time period of 6am – 4pm. The Company has represented to Staff that it was an oversight not to include this Off-Peak time period in the Company’s originally proposed pilot language.
- The introductory sentence as contained in the tariff as originally proposed by the Company references that the pricing periods are for “weekdays and weekends,” but the tariff as originally proposed by the Company did not identify separate pricing applicable to weekdays and weekends, although it did identify separate pricing applicable to each season. The Company has represented that it was an oversight not to include the weekend evening hours as Off-Peak in its originally proposed pilot language.²
- While the tariff as originally proposed by the Company did not define a separate time period applicable to weekends from weekdays, and did not define a time period applicable to the hours of 6am-4pm on weekdays, the Company represents that the intent of the tariff as originally proposed by the Company was to define Off-Peak as to include daytime hours and evening weekend hours. Staff does not dispute that result as unreasonable within the context of the Company’s original tariff proposal. Because the Company represents that the omission of those terms from the tariff as originally proposed by the Company was inadvertent, Staff does not object to the revision of the tariff as originally proposed by the Company to reflect the resulting Off-Peak definition as contained in the compliance tariff sheets KCPL 7A and GMO 146.6.

Standby Service Rider

- KCPL Sheet 28 and GMO Sheet 128 relocated and modified the language of a sentence concerning the eligibility of customers with net metering interconnection agreements, and

² The reading of the “and” in the phrase “weekdays and weekends” in the conjunctive in the tariff originally proposed by the Company is not an unreasonable interpretation. However, the Company has represented that its intent was to define the Off-Peak period to include evening weekend hours, reading “and” in the phrase “weekdays and weekends” in the disjunctive.

- KCPL Sheet 28B and GMO 128.2 have been modified to incorporate language relocated from KCPL Sheet 28 and GMO Sheet 128 concerning the exclusion of SGS participants from minimum billing demand requirements.
- GMO Sheet 128.2 also has been modified to adjust the kW minimum demands applicable to each class to the level specified in the otherwise applicable GMO rate schedule.
- Labels of unit values have been inserted and minor typographical changes have been made in both GMO and KCPL tariff sheets.
- KCPL personnel have represented that these modifications were made with input and consent from DE personnel. Staff does not understand these modifications to distort the intent of the provisions contained in the specimen tariff sheets.

RECOMMENDATION

Staff has reviewed the tariff sheets as filed by KCPL and GMO on November 6, as substituted and withdrawn, in part, on November 9, and as further substituted November 16, and is of the opinion that these tariff sheets are in compliance with the MEEIA provisions related to margin rates, and the Commission Order Approving Stipulations and Agreements, or are not inconsistent with the Order as described above. Therefore, Staff recommends the following tariff sheets be allowed to take effect December 6, 2018:

YE-2019-0083

PSC Mo. No. 2, Rules and Regulations

First Revised Sheet No. 1.04C, canceling Original Sheet No. 1.04C
Second Revised Sheet No. 1.24B, canceling First Revised Sheet No. 1.24B
First Revised Sheet No. 1.24C, canceling Original Sheet No. 1.24C
Seventh Revised Sheet No. 1.28, canceling Sixth Revised Sheet No. 1.28
Sixth Revised Sheet No. 1.42, canceling Fifth Revised Sheet No. 1.42
Second Revised Sheet No. 2, canceling First Revised Sheet No. 2
Second Revised Sheet No. 2.24, canceling First Revised Sheet No. 2.24

YE-2019-0084

PSC Mo. No. 7, Electric Rates

Tenth Revised Sheet No. 5A, canceling Ninth Revised Sheet No. 5A
Tenth Revised Sheet No. 5B, canceling Ninth Revised Sheet No. 5B
Sixth Revised Sheet No. 6, canceling Fifth Revised Sheet No. 6
First Revised Sheet No. 7, canceling Original Sheet No. 7
Original Sheet No. 7A

Tenth Revised Sheet No. 8, canceling Ninth Revised Sheet No. 8
Ninth Revised Sheet No. 8A, canceling Eighth Revised Sheet No. 8A
Tenth Revised Sheet No. 9A, canceling Ninth Revised Sheet No. 9A
Tenth Revised Sheet No. 9B, canceling Ninth Revised Sheet No. 9B
Tenth Revised Sheet No. 10A, canceling Ninth Revised Sheet No. 10A
Tenth Revised Sheet No. 10B, canceling Ninth Revised Sheet No. 10B
Tenth Revised Sheet No. 10C, canceling Ninth Revised Sheet No. 10C
Tenth Revised Sheet No. 11A, canceling Ninth Revised Sheet No. 11A
Tenth Revised Sheet No. 11B, canceling Ninth Revised Sheet No. 11B
Tenth Revised Sheet No. 14A, canceling Ninth Revised Sheet No. 14A
Tenth Revised Sheet No. 14B, canceling Ninth Revised Sheet No. 14B
First Revised Sheet No. 16, canceling Original Sheet No. 16
Original Sheet No. 16A
Original Sheet No. 16B

Tenth Revised Sheet No. 17A, canceling Ninth Revised Sheet No. 17A
Tenth Revised Sheet No. 18A, canceling Ninth Revised Sheet No. 18A
Tenth Revised Sheet No. 18B, canceling Ninth Revised Sheet No. 18B
Tenth Revised Sheet No. 18C, canceling Ninth Revised Sheet No. 18C
Tenth Revised Sheet No. 19A, canceling Ninth Revised Sheet No. 19A
Tenth Revised Sheet No. 19B, canceling Ninth Revised Sheet No. 19B
Tenth Revised Sheet No. 20C, canceling Ninth Revised Sheet No. 20C
Fifth Revised Sheet No. 20D, cancelling Fourth Revised Sheet No. 20D
Ninth Revised Sheet No. 21, canceling Eighth Revised Sheet No. 21
Eighth Revised Sheet No. 21A, canceling Seventh Revised Sheet No. 21A
Eighth Revised Sheet No. 21B, canceling Seventh Revised Sheet No. 21B
Seventh Revised Sheet No. 21C, canceling Sixth Revised Sheet No. 21C
Seventh Revised Sheet No. 21D, canceling Sixth Revised Sheet No. 21D
Second Revised Sheet No. 22, canceling First Revised Sheet No. 22
Second Revised Sheet No. 24, canceling First Revised Sheet No. 24
Twelfth Revised Sheet No. 24A, canceling Eleventh Revised Sheet No. 24A
Fifth Revised Sheet No. 26, canceling Fourth Revised Sheet No. 26
Fifth Revised Sheet No. 26A, canceling Fourth Revised Sheet No. 26A
Fourth Revised Sheet No. 26B, canceling Third Revised Sheet No. 26B
Sixth Revised Sheet No. 26C, canceling Fifth Revised Sheet No. 26C
Fourth Revised Sheet No. 26D, canceling Third Revised Sheet No. 26D
Second Revised Sheet No. 28, canceling First Revised Sheet No. 28
First Revised Sheet No. 28A, canceling Original Sheet No. 28A

Ninth Revised Sheet No. 28B, canceling Eighth Revised Sheet No. 28B
First Revised Sheet No. 28C, canceling Original Sheet No. 28C
Third Revised Sheet No. 28D, canceling Second Revised Sheet No. 28D
Original Sheet No. 28E
Original Sheet No. 28F
Original Sheet No. 28G
Third Revised Sheet No. 29, canceling Second Revised Sheet No. 29
Second Revised Sheet No. 29A, canceling First Revised Sheet No. 29A
Second Revised Sheet No. 29B, canceling First Revised Sheet No. 29B
Second Revised Sheet No. 29C, canceling First Revised Sheet No. 29C
Second Revised Sheet No. 29D, canceling First Revised Sheet No. 29D
Tenth Revised Sheet No. 30, canceling Ninth Revised Sheet No. 30
Second Revised Sheet No. 30A, canceling First Revised Sheet No. 30A
Tenth Revised Sheet No. 33, canceling Ninth Revised Sheet No. 33
Third Revised Sheet No. 33A, canceling Second Revised Sheet No. 33A
Fourth Revised Sheet No. 33B, canceling Third Revised Sheet No. 33B
Eleventh Revised Sheet No. 35, canceling Tenth Revised Sheet No. 35
Eleventh Revised Sheet No. 35A, canceling Tenth Revised Sheet No. 35A
Eleventh Revised Sheet No. 35B, canceling Tenth Revised Sheet No. 35B
Eleventh Revised Sheet No. 36, canceling Tenth Revised Sheet No. 36
Eleventh Revised Sheet No. 36A, canceling Tenth Revised Sheet No. 36A
Eleventh Revised Sheet No. 36B, canceling Tenth Revised Sheet No. 36B
Tenth Revised Sheet No. 37, canceling Ninth Revised Sheet No. 37
Tenth Revised Sheet No. 37A, canceling Ninth Revised Sheet No. 37A
Tenth Revised Sheet No. 37B, canceling Ninth Revised Sheet No. 37B
Tenth Revised Sheet No. 37C, canceling Ninth Revised Sheet No. 37C
Fourth Revised Sheet No. 39, canceling Third Revised Sheet No. 39
Second Revised Sheet No. 39A, canceling First Revised Sheet No. 39A
Second Revised Sheet No. 39B, canceling First Revised Sheet No. 39B
Second Revised Sheet No. 39C, canceling First Revised Sheet No. 39C
Third Revised Sheet No. 39D, canceling Second Revised Sheet No. 39D
Second Revised Sheet No. 39E, canceling First Revised Sheet No. 39E
Fourth Revised Sheet No. 40, canceling Third Revised Sheet No. 40
Sixth Revised Sheet No. 40A, canceling Fifth Revised Sheet No. 40A
Fourth Revised Sheet No. 40B, canceling Third Revised Sheet No. 40B
Second Revised Sheet No. 40C, canceling First Revised Sheet No. 40C
Second Revised Sheet No. 40D, canceling First Revised Sheet No. 40D
Second Revised Sheet No. 40E, canceling First Revised Sheet No. 40E
Second Revised Sheet No. 40F, canceling First Revised Sheet No. 40F
Second Revised Sheet No. 40G, canceling First Revised Sheet No. 40G
Second Revised Sheet No. 40H, canceling First Revised Sheet No. 40H
Second Revised Sheet No. 44, canceling First Revised Sheet No. 44
Original Sheet No. 44A
Original Sheet No. 44B
Tenth Revised Sheet No. 45, canceling Ninth Revised Sheet No. 45

Tenth Revised Sheet No. 45A, canceling Ninth Revised Sheet No. 45A
Third Revised Sheet No. 48A, canceling Second Revised Sheet No. 48A
Second Revised Sheet No. 49P, canceling First Revised Sheet No. 49P
Second Revised Sheet No. 50.11, canceling First Revised Sheet No. 50.11
Second Revised Sheet No. 50.12, canceling First Revised Sheet No. 50.12
Second Revised Sheet No. 50.13, canceling First Revised Sheet No. 50.13
Second Revised Sheet No. 50.14, canceling First Revised Sheet No. 50.14
Second Revised Sheet No. 50.15, canceling First Revised Sheet No. 50.15
Second Revised Sheet No. 50.16, canceling First Revised Sheet No. 50.16
Second Revised Sheet No. 50.17, canceling First Revised Sheet No. 50.17
Second Revised Sheet No. 50.18, canceling First Revised Sheet No. 50.18
Second Revised Sheet No. 50.19, canceling First Revised Sheet No. 50.19
Original Sheet No. 50.21
Original Sheet No. 50.22
Original Sheet No. 50.23
Original Sheet No. 50.24
Original Sheet No. 50.25
Original Sheet No. 50.26
Original Sheet No. 50.27
Original Sheet No. 50.28
Original Sheet No. 50.29
Original Sheet No. 50.30
Original Sheet No. 50.31

Sixteenth Revised Sheet No. TOC-1, canceling Fifteenth Revised Sheet No. TOC-1
Original Sheet No. TOC-1A

First Revised Sheet No. TOC-2, canceling Original Sheet No. TOC-2
Second Revised Sheet No. TOC-2A, canceling First Revised Sheet No. TOC-2A

YE-2019-0085

PSC Mo. No. 1, Rates Electric

9th Revised Sheet No. 1, canceling 8th Revised Sheet No. 1
Original Sheet No. 1.1
13th Revised Sheet No. 2, canceling 12th Revised Sheet No. 2
Original Sheet 2.1
8th Revised Sheet No. 41, canceling 7th Revised Sheet No. 41
9th Revised Sheet No. 42, canceling 8th Revised Sheet No. 42
8th Revised Sheet No. 43, canceling 7th Revised Sheet No. 43
8th Revised Sheet No. 44, canceling 7th Revised Sheet No. 44
7th Revised Sheet No. 47, canceling 6th Revised Sheet No. 47
7th Revised Sheet No. 48, canceling 6th Revised Sheet No. 48
3rd Revised Sheet No. 49, canceling 2nd Revised Sheet No. 49
9th Revised Sheet No. 50, canceling 8th Revised Sheet No. 50
1st Revised Sheet No. 50.1, canceling Original Sheet No. 50.1

8th Revised Sheet No. 66, canceling 7th Revised Sheet No. 66
7th Revised Sheet No. 67, canceling 6th Revised Sheet No. 67
7th Revised Sheet No. 68, canceling 6th Revised Sheet No. 68
7th Revised Sheet No. 70, canceling 6th Revised Sheet No. 70
8th Revised Sheet No. 71, canceling 7th Revised Sheet No. 71
8th Revised Sheet No. 88, canceling 7th Revised Sheet No. 88
8th Revised Sheet No. 89, canceling 7th Revised Sheet No. 89
7th Revised Sheet No. 90, canceling 6th Revised Sheet No. 90
7th Revised Sheet No. 91, canceling 6th Revised Sheet No. 91
7th Revised Sheet No. 92, canceling 6th Revised Sheet No. 92
5th Revised Sheet No. 93, canceling 4th Revised Sheet No. 93
4th Revised Sheet No. 94, canceling 3rd Revised Sheet No. 94
9th Revised Sheet No. 95, canceling 8th Revised Sheet No. 95
1st Revised Sheet No. 95.1, canceling Original Sheet No. 95.1
9th Revised Sheet No. 102, canceling 8th Revised Sheet No. 102
Original Sheet 102.1
Original Sheet 102.2
8th Revised Sheet No. 103, canceling 7th Revised Sheet No. 103
8th Revised Sheet No. 104, canceling 7th Revised Sheet No. 104
2nd Revised Sheet No. 109, canceling 1st Revised Sheet No. 109
Original Sheet No. 109.1
Original Sheet No. 109.2
Original Sheet No. 109.3
Original Sheet No. 109.4
Original Sheet No. 109.5
3rd Revised Sheet No. 127.1, canceling 2nd Revised Sheet No. 127.1
3rd Revised Sheet No. 127.2, canceling 2nd Revised Sheet No. 127.2
3rd Revised Sheet No. 127.3, canceling 2nd Revised Sheet No. 127.3
3rd Revised Sheet No. 127.4, canceling 2nd Revised Sheet No. 127.4
7th Revised Sheet No. 127.5, canceling 6th Revised Sheet No. 127.5
3rd Revised Sheet No. 127.6, canceling 2nd Revised Sheet No. 127.6
3rd Revised Sheet No. 127.7, canceling 2nd Revised Sheet No. 127.7
3rd Revised Sheet No. 127.8, canceling 2nd Revised Sheet No. 127.8
3rd Revised Sheet No. 127.9, canceling 2nd Revised Sheet No. 127.9
5th Revised Sheet No. 127.10, canceling 4th Revised Sheet No. 127.10
1st Revised Sheet No. 127.11, canceling Original Sheet No. 127.11
Original Sheet No. 127.13
Original Sheet No. 127.14
Original Sheet No. 127.15
Original Sheet No. 127.16
Original Sheet No. 127.17
Original Sheet No. 127.18
Original Sheet No. 127.19
Original Sheet No. 127.20
Original Sheet No. 127.21

Original Sheet No. 127.22
Original Sheet No. 127.23
2nd Revised Sheet No. 128, canceling 1st Revised Sheet No. 128
Original Sheet No. 128.1
Original Sheet No. 128.2
Original Sheet No. 128.3
Original Sheet No. 128.4
Original Sheet No. 128.5
Original Sheet No. 128.6
2nd Revised Sheet No. 135, canceling 1st Revised Sheet No. 135
3rd Revised Sheet No. 138.8, canceling 2nd Revised Sheet No. 138.8
Original Sheet No. 139
Original Sheet No. 139.1
Original Sheet No. 139.2
Original Sheet No. 139.3
Original Sheet No. 139.4
Original Sheet No. 139.5
Original Sheet No. 139.6
Original Sheet No. 139.7
1st Revised Sheet No. 140, canceling Original Sheet No. 140
1st Revised Sheet No. 141, canceling Original Sheet No. 141
1st Revised Sheet No. 142, canceling Original Sheet No. 142
1st Revised Sheet No. 143, canceling Original Sheet No. 143
1st Revised Sheet No. 144, canceling Original Sheet No. 144
1st Revised Sheet No. 145, canceling Original Sheet No. 145
1st Revised Sheet No. 146.1, canceling Original Sheet No. 146.1
1st Revised Sheet No. 146.3, canceling Original Sheet No. 146.3
Original Sheet No. 146.5
Original Sheet No. 146.6
1st Revised Sheet No. 147.1, canceling Original Sheet No. 147.1
1st Revised Sheet No. 147.2, canceling Original Sheet No. 147.2
1st Revised Sheet No. 147.3, canceling Original Sheet No. 147.3
1st Revised Sheet No. 148.1, canceling Original Sheet No. 148.1
1st Revised Sheet No. 148.2, canceling Original Sheet No. 148.2
1st Revised Sheet No. 149, canceling Original Sheet No. 149
1st Revised Sheet No. 149.1, canceling Original Sheet No. 149.1
1st Revised Sheet No. 149.2, canceling Original Sheet No. 149.2
1st Revised Sheet No. 149.3, canceling Original Sheet No. 149.3
1st Revised Sheet No. 149.4, canceling Original Sheet No. 149.4
1st Revised Sheet No. 150, canceling Original Sheet No. 150
1st Revised Sheet No. 150.1, canceling Original Sheet No. 150.1
1st Revised Sheet No. 150.2, canceling Original Sheet No. 150.2
1st Revised Sheet No. 151, canceling Original Sheet No. 151
Original Sheet No. 152
Original Sheet No. 152.1

Original Sheet No. 152.2
Original Sheet No. 153
Original Sheet No. 153.1
Original Sheet No. 154
Original Sheet No. 154.1
Original Sheet No. 156
Original Sheet No. 156.1
Original Sheet No. 156.2
Original Sheet No. 156.3

PSC Mo. No. 1, Rules and Regulations Electric

3rd Revised Sheet No. R-1, canceling 2nd Revised Sheet No. R-1
Original Sheet No. R-33.2
1st Revised Sheet No. R-33.3, canceling Original Sheet No. R-33.3
5th Revised Sheet No. R-63, canceling 4th Revised Sheet No. R-63
2nd Revised Sheet No. R-63.01.1, canceling 1st Revised Sheet No. R-63.01.1
2nd Revised Sheet No. R-63.22, canceling 1st Revised Sheet No. R-63.22
2nd Revised Sheet No. R-63.23, canceling 1st Revised Sheet No. R-63.23
2nd Revised Sheet No. R-63.24, canceling 1st Revised Sheet No. R-63.24
2nd Revised Sheet No. R-63.25, canceling 1st Revised Sheet No. R-63.25
3rd Revised Sheet No. R-63.26, canceling 2nd Revised Sheet No. R-63.26

Staff is not aware of any pending actions or unsatisfied judgments against KCPL or GMO concerning customer service or rates occurring within three years of this filing.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In The Matter of KCP&L Greater Missouri Operations)
Company's Request for Authority to Implement a)
General Rate Increase for Electric Service)

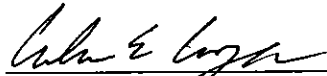
Case No. ER-2018-0146

AFFIDAVIT OF CEDRIC E. CUNIGAN

State of Missouri)
) ss
County of Cole)

COMES NOW Cedric E. Cunigan, and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached *Staff's Recommendation Regarding Revised Tariffs*; and that the same is true and correct according to his best knowledge and belief.

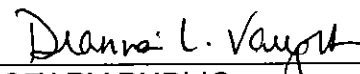
Further the Affiant sayeth not.



Cedric E. Cunigan

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16th day of November, 2018.



NOTARY PUBLIC

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 28, 2019 Commission Number: 15207377

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In The Matter of KCP&L Greater Missouri Operations)
 Company's Request for Authority to Implement a) Case No. ER-2018-0146
 General Rate Increase for Electric Service)

AFFIDAVIT OF CLAIRE M. EUBANKS, PE

State of Missouri)
) ss
 County of Cole)

COMES NOW Claire M. Eubanks, PE, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Staff's Recommendation Regarding Revised Tariffs*; and that the same is true and correct according to her best knowledge and belief.

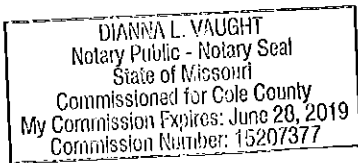
Further the Affiant sayeth not.

Claire M. Eubanks
 Claire M. Eubanks, PE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16th day of November, 2018.

Dianna L. Vaughn
 NOTARY PUBLIC



**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In The Matter of KCP&L Greater Missouri Operations)
Company's Request for Authority to Implement a)
General Rate Increase for Electric Service)

Case No. ER-2018-0146

AFFIDAVIT OF ROBIN KLIETHERMES

State of Missouri)
) ss
County of Cole)

COMES NOW Robin Kliethermes, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Staff's Recommendation Regarding Revised Tariffs*; and that the same is true and correct according to her best knowledge and belief.


Further the Affiant sayeth not.



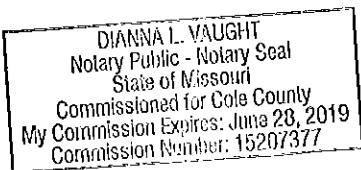
Robin Kliethermes

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16th day of November, 2018.



NOTARY PUBLIC



**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In The Matter of KCP&L Greater Missouri Operations)
Company's Request for Authority to Implement a)
General Rate Increase for Electric Service)

Case No. ER-2018-0146

AFFIDAVIT OF SARAH L.K. LANGE

State of Missouri)
) ss
County of Cole)

COMES NOW Sarah L.K. Lange, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Staff's Recommendation Regarding Revised Tariffs*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Sarah L.K. Lange

Sarah L.K. Lange

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16th day of November, 2018.

Dianna L. Vaughn

NOTARY PUBLIC

