



Roger W. Steiner
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February 21, 2019

Mr. Morris Woodruff
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65102

**Re: Third Substitute Tariff Schedule to Adjust FAC Rate of
KCP&L Greater Missouri Operations Company – Case No. ER-2019-0198**

Dear Mr. Woodruff:

KCP&L Greater Missouri Operations Company (“GMO” or the “Company”) hereby submits a substitute proposed rate schedule to adjust charges related to the Company’s approved Fuel Adjustment Clause (“FAC”) pursuant to 4 C.S.R. 240-20.090(4) of the regulations of the Missouri Public Service Commission (“Commission”). The proposed rate schedules bear an issue date of December 31, 2018, and an effective date of March 1, 2019.

Company is submitting this third revised substitute tariff sheet based on its understanding of discussions by the Commission during its agenda meeting on February 20, 2019. Specifically, GMO understands that the Commission would like the amounts disputed by Office of Public Counsel (“OPC”) to be removed from the current filing so that (1) recovery of the amounts in the filing that are not in dispute can commence as soon as reasonably practicable, and (2) the amounts in dispute can be presented to the Commission for decision, if necessary, in an orderly fashion. Based on that understanding, the Company has revised the GMO Fuel Adjustment Rate (“FAR”) calculations to remove the disputed amounts raised by OPC related to steam auxiliary power. The amounts disputed total \$482,557 which is comprised of two components: 1) \$219,496 previously included in the true-up for the 20th Accumulation Period in Case No. ER-2019-0199 and 2) \$263,061 that the Company has reduced its current 23rd Accumulation Period Fuel and Purchased Power Adjustment (“FPA”) for setting FAR rates in Case No. ER-2019-0198. This is reflected on revised tariff sheet 127.12. The revised calculations were provided to both Staff and the OPC for review in advance of this substitute filing. Both Staff and OPC have indicated to GMO their agreement that GMO has calculated the amounts in dispute accurately. GMO has also been authorized to indicate that OPC and Staff

support the Commission taking such action as is appropriate to permit this third revised substitute tariff sheet to take effect on March 1, 2019 by operation of law.

In addition, GMO, Staff and OPC understand that the Commission will schedule a procedural conference so that the parties may develop an appropriate procedural schedule to propose to the Commission for orderly resolution of the amounts in dispute.

While the amounts disputed by OPC have been removed from the rates proposed in this semi-annual FAR filing based on GMO's understanding of the Commission's February 20, 2019 agenda discussion set forth above, the amounts in dispute will be deferred on the Company's books, with interest in accordance with GMO's FAC tariff, pending resolution of the dispute.

GMO has provided this cover letter and substitute tariff sheet to OPC and Staff in advance of submission to the Commission and neither OPC nor Staff has expressed objection to its contents.

Copies of the revised FAC-related rate schedules and all supporting materials described in this letter will be served electronically, this date, on the Commission's General Counsel, Staff Counsel, the Office of Public Counsel, and each party to Case No. ER-2016-0156.

Please provide a copy of all correspondence, notices, orders, and other communications that relate to this filing to the following as well as undersigned counsel:

Lisa A. Starkebaum
Manager - Regulatory Affairs
Kansas City Power & Light Company
1200 Main Street – 19th Floor
Kansas City, Missouri 64105
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Email: lisa.starkebaum@kcpl.com

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner
Corporate Counsel for
KCP&L Greater Missouri Operations Company

cc: Office of the General Counsel
Office of Staff Counsel
Office of the Public Counsel



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February 7, 2019

Mr. Morris Woodruff
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65102

**Re: Second Substitute Tariff Schedule to Adjust FAC Rate of
KCP&L Greater Missouri Operations Company – Case No. ER-2019-0198**

Dear Mr. Woodruff:

KCP&L Greater Missouri Operations Company (“KCP&L-GMO” or the “Company”) hereby submits a substitute proposed rate schedule to adjust charges related to the Company’s approved Fuel Adjustment Clause (“FAC”) pursuant to 4 C.S.R. 240-20.090(4) of the regulations of the Missouri Public Service Commission (“Commission”). The proposed rate schedules bear an issue date of December 31, 2018, and an effective date of March 1, 2019.

Company is making this second revised substitute tariff filing resulting from discussions held between Commission Staff and the Company. This substitute tariff supersedes the Company’s first substitute filing made on January 23, 2019. Based on discussions with Commission Staff, for this first FAC filing impacted by Section 393.1655.6, the Non-LP FAR has been adjusted to exclude the amount in excess of the 2% cap on the LP customer class amounting to \$2,638,572. This amount will remain deferred for recovery through a subsequent filing. This is reflected on revised tariff sheet 127.12, lines 11-13.

Copies of the revised FAC-related rate schedules and all supporting materials described in this letter will be served electronically, this date, on the Commission’s General Counsel, the Office of Public Counsel, and each party to Case No. ER-2016-0156.

Please provide a copy of all correspondence, notices, orders, and other communications that relate to this filing to the following as well as undersigned counsel:

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Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner
Corporate Counsel for
KCP&L Greater Missouri Operations Company

cc: Office of the General Counsel
Office of the Public Counsel



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January 23, 2019

Mr. Morris Woodruff
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65102

**Re: Substitute Tariff Schedule to Adjust FAC Rate of
KCP&L Greater Missouri Operations Company – Case No. ER-2019-0198**

Dear Mr. Woodruff:

KCP&L Greater Missouri Operations Company (“KCP&L-GMO” or the “Company”) hereby submits a substitute proposed rate schedule to adjust charges related to the Company’s approved Fuel Adjustment Clause (“FAC”) pursuant to 4 C.S.R. 240-20.090(4) of the regulations of the Missouri Public Service Commission (“Commission”). The proposed rate schedules bear an issue date of December 31, 2018, and an effective date of March 1, 2019.

Subsequent to the Company’s filing on December 31, 2018 in Case No. ER-2019-0198, the Company discovered an error in the revenue amounts included in the GMO FAC PISA calculation for the Average Overall Rate and the Class Average Overall Rate. The first correction made to the base revenue component used in the calculation of the Average Overall Rate effective at December 6, 2018 did not result in any changes to the Average Overall Rate or the 3% test. This change was made so that the rate case amounts included in the PISA calculation ties to the settlement amounts and supporting worksheet in Case No. ER-2018-0146. However, the second correction made to base revenues for Large Power customers used in the calculation of the Class Average Overall Rate effective December 6, 2018 did change. As a result, this error impacted the 2% Large Power cap resulting in a projected rate change of 3.75% rather than the 3.78% as originally filed, and amounts to an increase of \$22,944 charged to the Large Power customer class for recovery. This correction is reflected on revised tariff sheet 127.12, lines 11-13.

Copies of the revised FAC-related rate schedules and all supporting materials described in this letter will be served electronically, this date, on the Commission’s General Counsel, the Office of Public Counsel, and each party to Case No. ER-2016-0156.

Please provide a copy of all correspondence, notices, orders, and other communications that relate to this filing to the following as well as undersigned counsel:

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Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner
Corporate Counsel for
KCP&L Greater Missouri Operations Company

cc: Office of the General Counsel
Office of the Public Counsel



Roger W. Steiner
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December 31, 2018

Mr. Morris Woodruff
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65102

**Re: Tariff Schedule to Adjust FAC Rate of
KCP&L Greater Missouri Operations Company**

Dear Mr. Woodruff:

Pursuant to 4 C.S.R. 240-20.090(4) of the regulations of the Missouri Public Service Commission (“Commission”), KCP&L Greater Missouri Operations Company (“KCP&L-GMO” or the “Company”) hereby submits proposed rate schedules to adjust charges related to the Company’s approved Fuel Adjustment Clause (“FAC”). The proposed rate schedules bear an issue date of December 31, 2018, and an effective date of March 1, 2019.

FAC net includable costs for the 23rd accumulation period, or six-month period covering June 2018 through November 2018, exceeded the base energy costs included in base rates by approximately \$31 million for KCP&L-GMO. In addition, the true-up filing for the 20th accumulation period, or six-month accumulation period from December 2016 through May 2017, is being made in conjunction with this tariff filing and reflects an under-collection of approximately \$164K.

In accordance with the FAC for KCP&L-GMO approved by the Commission, the proposed rate schedules are designed to recover 95 percent of those net cost increases. The proposed residential FAC charge will be \$0.00541 per kWh. Based on usage of 1,000 kWh per month, the customer will see a monthly charge of \$5.41. This represents an increase of \$3.01 to a GMO residential customer’s monthly bill above the prior FAC.

Through a filing made concurrently herewith in Case No. EO-2019-0045, GMO has provided notice of its election, effective January 1, 2019, to make the plant in service accounting deferrals permitted under section 393.1400 RSMo. As a result, the rate cap provisions of section 393.1655 RSMo. will apply to this FAC charge filing. The change in the FAC charge proposed

in this filing does not increase the average overall rate for GMO by more than 3% and, as such, the provisions of section 393.1655.5 do not affect this FAC charge filing. However, in accordance with section 393.1655.6 RSMo., GMO has limited the increase in the FAC charge applicable to Large Power customers to 2% of the class average overall rate for that rate class, with the reduced revenues arising from limiting the large power service class average overall rate increase allocated to all other GMO classes through a uniform percentage adjustment to the revenue requirement responsibility of all the other customer classes.

Direct Testimony and supporting schedules of Lisa Starkebaum are submitted concurrently herewith along with schedules containing the information required by 4 C.S.R. 240-3.161(7), including all workpapers that support the proposed rate schedules.

Copies of the proposed FAC-related rate schedules and all supporting materials described in this letter will be served electronically, this date, on the Commission's General Counsel, the Office of Public Counsel, and each party to Case No. ER-2016-0156.

Please provide a copy of all correspondence, notices, orders, and other communications that relate to this filing to the following as well as undersigned counsel:

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Respectfully submitted,

/s/ Roger W. Steiner

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