



April 19, 2017

Secretary of the Commission
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

RE: Request Commission Approval of:

- Revised Tariff Sheet No. 1 (Table of Contents)
- Revised Tariff Sheet No. 2 (Table of Contents)
- Revised Tariff Sheets No. 41 and 42 (Municipal Street Lighting Service)
- Revised Tariff Sheets No. 45 and 46 (Street Lighting and Traffic Signals)
- Revised Tariff Sheets No. 88, 89, and 90 (Municipal Street Lighting Service)
- Revised Tariff Sheet No. 94 (Municipal Street Lighting and Private Area Lighting Service)
- Revised Tariff Sheet No. 95 (Non-Standard Street and Area Light Facilities)
- Original Tariff Sheets No. 150, 150.1, and 150.2 (Municipal Street Lighting Service)
- Original Tariff Sheet No. 151 (Off-Peak Lighting Service)

Dear Secretary:

KCP&L-Greater Missouri Operations Company ("GMO") seeks approval from the Missouri Public Service Commission of the enclosed tariffs.

This filing is made to incorporate Light Emitting Diode ("LED") alternatives into the tariff. GMO has been researching the suitability and practicality of deploying LED based lighting for roadway uses and believes LED lighting is a viable option for lighting of public roadways.

GMO seeks approval of tariffs which will allow it to pursue a structured conversion of all roadway lighting (non-decorative, pole mounted, over road lighting) to LED fixtures. Over an approximately ten-month period, GMO proposes to convert the approximately 39,000 lights using a combination of five LED fixture sizes. This filing proposes to limit the availability of Mercury Vapor and High Pressure Sodium lighting made obsolete by the LED technology.

Also as part of this filing, GMO proposes to:

- Consolidate the former L&P and MPS area Municipal Street Lighting tariffs into a single GMO tariff. This will bring the Municipal Street Lighting tariffs consistent with the consolidation of the other retail rates ordered under ER-2016-0156. Existing, separate tariffs will be frozen to allow the current lighting fixtures to persist while the conversion is underway.
- Introduce two decorative LED luminaires to the Municipal Street Lighting tariff. These decorative options will be available for new installations only.
- Consolidate the separate L&P and MPS rates for customer-owned municipal roadway lighting.
- Freeze availability of the L&P outdoor night lighting tariff. New customers requiring service for outdoor night lighting would be served under a generally available commercial rate, likely one of the small general service rates.



- Freeze Municipal Traffic Signals rates. New customers requiring service to traffic signals would be served under a generally available commercial rate, likely one of the small general service rates.

This filing represents a continuation of the LED implementation approved for KCP&L under JE-2016-0344. The details of the filing are consistent with the KCP&L filing and build off of the lessons learned through that effort.

Thank you for your consideration of these revised tariff sheets. Please contact me directly at (816) 654-1689 or brad.lutz@kcpl.com if you require any additional information.

Sincerely,

A handwritten signature in black ink that reads 'Brad Lutz'. The signature is written in a cursive, slightly slanted style.

Brad Lutz
Manager Regulatory Affairs

Enclosure:
Letter of Transmittal
Proposed tariff sheets (with red-line versions)

cc:
T Rush
L Liechti
Office of Public Counsel