

Roger W. Steiner

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July 31, 2019

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 Kansas City Power & Light Company

Dear Mr. Woodruff:

Pursuant to 4 C.S.R. 240-20.090(8) of the regulations of the Missouri Public Service Commission ("Commission"), Kansas City Power & Light Company ("KCP&L" 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 July 31, 2019, and an effective date of October 1, 2019.

FAC net includable costs for the eighth accumulation period, or six-month period covering January 2019 through June 2019, were lower than the base energy costs included in base rates by approximately \$2.2 million for KCP&L. In addition, the true-up filing for the fifth accumulation period, or six-month accumulation period covering July 2017 through December 2017, is being made in conjunction with this tariff filing and reflects an over-collection of approximately \$839K.

In accordance with the FAC for KCP&L approved by the Commission, the proposed rate schedules are designed to recover from customers 95 percent of those net cost increases/decreases. The proposed residential FAC charge will be \$0.00073 per kWh. Based on usage of 1,000 kWh per month, a KCP&L residential customer will see a monthly charge of \$0.73. This represents a decrease of approximately \$3.36 to a KCP&L residential customer's bill.

Earlier this year, in Case No. EO-2019-0047, KCP&L provided notice of its election, effective January 1, 2019, to make the plant in service accounting ("PISA") deferrals permitted under section 393.1400 RSMo. Due to the rate cap provisions of section 393.1655 RSMo., KCP&L performed the calculations to determine if this semi-annual FAR filing exceeded the compound annual growth rate (CAGR) limitations. KCP&L used 2.46% for the average overall rate cap and 1.64% for the class average overall rate cap in this filing. As shown in the KCP&L

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PISA Calculation that is provided as support with this filing, there is no PISA impact resulting from this FAR filing.

Direct Testimony and supporting schedules of Lisa A. Starkebaum are submitted concurrently herewith along with schedules containing the information required by 4 C.S.R. 240-20.090(8), including all work papers 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 Staff Counsel, the Office of Public Counsel, and each party to Case No. ER-2018-0145.

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 – 19<sup>th</sup> Floor Kansas City, Missouri 64105

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Respectfully submitted,

|s| Roger W. Steiner

Roger W. Steiner Corporate Counsel for KCP&L

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