

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

Filed
August 17, 2011
Data Center
Missouri Public
Service Commission

In the Matter of the 2009 Resource Plan of)
KCP&L Greater Missouri Operations Company)
Pursuant to 4 CSR 240-22)

Case No. EE-2009-0237

NONUNANIMOUS STIPULATION AND AGREEMENT

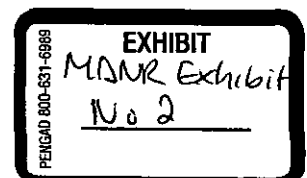
Pursuant to 4 CSR 240-22.080(8), KCP&L Greater Missouri Operations Company ("GMO"), the Staff of the Missouri Public Service Commission ("Staff"), the Office of Public Counsel ("OPC"), the Missouri Department of Natural Resources ("MDNR"), and Dogwood Energy, LLC ("Dogwood") (collectively, the "Signatories") hereby submit to the Missouri Public Service Commission ("Commission") this stipulation and agreement (the "Agreement") to remedy all alleged deficiencies and concerns expressed by the signatories of this agreement regarding the compliance filing GMO submitted in this proceeding on August 5, 2009, as supplemented. Sedalia Industrial Energy Users' Association ("SIEUA"), the City of Kansas City, Missouri ("KCMO"), and the Missouri Joint Municipal Electric Utility Commission ("MJMEUC") intervened in this case but they are not signatories to this agreement.

In support hereof, the Signatories offer as follows:

BACKGROUND

1. On August 5, 2009, GMO submitted its compliance filing with Chapter 22 of the Commission's regulations concerning GMO's resource planning. GMO submitted a supplemental filing on November 2, 2009 to provide additional information and clarify certain aspects of its original filing (collectively, "2009 IRP"). GMO will submit a revised IRP filing in this case on or before December 17, 2010 ("the revised filing") and will complete its next

DNR Exhibit No. 1
Date 8-1-11 Reporter SL
File No. EE-2009-



Chapter 22 compliance filing in August 2012 (“the next Chapter 22 compliance filing”) unless new Chapter 22 rules alter the compliance date.

2. On December 10, 2009, Staff, OPC, MDNR, and Dogwood submitted reports identifying concerns and in some cases alleging certain deficiencies regarding GMO’s 2009 IRP. Although SIEUA, KCMO, and MJMEUC intervened in the case, they did not submit a report.

3. The Commission’s resource planning regulations provide that if the Staff, Public Counsel or any intervenor finds deficiencies, they shall work with the electric utility and the other parties in an attempt to reach a joint agreement on a plan to remedy the identified deficiencies. 4 CSR 240-22.080(8). The Signatories have worked together to develop such a joint plan. This Agreement represents the fruits of those efforts.

DOCUMENT ORGANIZATION

4. The order of items contained within this document is as follows:

I. Agreed Upon Remedies to Concerns and Alleged Deficiencies

Load Analysis – Page 3

Supply-Side Resources Analysis – Page 3

Demand-Side Resource Analysis – Page 7

Integrated Resource Analysis - Page 11

Risk Analysis and Strategy Selection – Page 14

Filing Schedule and Requirements - Page 16

II. Effect of Nonunanimous Stipulation and Agreement – Page 17

III. Commission Approval of Nonunanimous Stipulation and Agreement – Page 19

IV. Issues Unresolved by Nonunanimous Stipulation and Agreement – Page 20

AGREED UPON REMEDIES TO CONCERNS AND ALLEGED DEFICIENCIES

4 CSR 240-22.030 Load Analysis and Forecasting

5. Staff's Concern A states: GMO's energy and demand forecasts do not properly account for changing economic conditions -- 4 CSR240-22.030(5). This concern is resolved in the agreement to a stakeholder process and revised filing contained in Appendix 1 which by this reference is incorporated herein. It is addressed in the "Load Analysis and Forecasting" section of Appendix 1.

6. Staff's Concern B states: GMO only consulted one expert when determining the subjective probabilities assigned to its high-case, base-case and low-case load forecasts. This concern is resolved in the agreement to a stakeholder process and revised filing contained in Appendix 1. It is addressed in the "Load Analysis and Forecasting" section of Appendix 1. Further, GMO agrees to use three or more decision-makers when assigning probabilities to the high-case, base-case and low-case load forecasts for the next Chapter 22 compliance filing.

7. Staff's Concern C states: The subjective probabilities GMO assigned to its high-case, base-case and low-case load forecasts do not properly account for the increasing probability and the impact of future federal and/or state legislation regarding energy efficiency resource standards (EERS) -- 4 CSR 240-22.030(7). After clarification with GMO in post Staff Report discussions, Staff agrees that GMO adequately addressed this concern in its 2009 IRP filing.

4 CSR 240-22.040 Supply-Side Resources Analysis

8. In what MDNR labels as "MDNR Deficiency #2," MDNR, citing 4 CSR 240-22.040(1), states that "the Company fails to identify and analyze retirement of Sibley 3 and/or Lake Road 4-6 as supply-side options." This issue is resolved by the agreement to a stakeholder process and revised filing contained in Appendix 1, paragraphs 9 through 12.

9. In what MDNR labels as "MDNR Deficiency #3," MDNR, citing 4 CSR 240-22.040(1)(E), states that "GMO's analysis relies on capital costs for the wind resource options that were out of date at the time the IRP filing was made, makes no accommodation for the effect of fundamental economic supply/demand forces on the prices for a wind resource, and fails to account for predicted declines in real cost trends for wind resources." This issue is resolved by the agreement to a stakeholder process and revised filing contained in Appendix 1, paragraph 13.

10. In what MDNR labels as "MDNR Deficiency #4," MDNR, citing 4 CSR 240-22.040(1)(E) and 4 CSR 240-22.050(1), states that "GMO's analysis relies on inappropriately high costs for residential solar photovoltaic (PV) resource options." As resolution, GMO agrees to submit in a supplemental filing: the report, "A Renewable Energy System Performance Report", dated June 01, 2009, prepared by Bob Solgar, with The Energy Savings Store (TESS). GMO agrees to continue monitoring changes in costs for residential solar photovoltaic (PV) resource options for its next regularly scheduled IRP filing.

11. In what MDNR labels as "MDNR Deficiency #5," MDNR, citing 4 CSR 240-22.040(2)(B)1-2, states that "GMO failed to identify and analyze the potential impact of two levels of NOx and SO2 mitigation requirements. GMO is inconsistent in its assessment of potential NOx and SO2 regulatory regimes that would affect the cost of compliance." MDNR notes that the issues of regulatory uncertainty raised in its December comments will probably be rendered moot if, as expected, USEPA announces a proposed replacement for the Clean Air Interstate Rule (CAIR) in April or May 2010. This issue is resolved by the agreement to a stakeholder process and revised filing contained in Appendix 1, paragraph 14.

12. In what MDNR labels as "MDNR Deficiency #6," MDNR, citing 4 CSR 240-22.040(8)(D)2, states that "GMO's methodology for estimating the probability distribution for

NOx allowance prices appears to be substantively deficient as well as divergent from rule requirements. The divergence from rule requirements is not supported by the language in Waiver #11." This issue is resolved by the agreement to a stakeholder process and revised filing contained in Appendix 1, paragraphs 15 and 16.

13. In what MDNR labels as "MDNR Deficiency #7," MDNR, citing 4 CSR 240-22.040(8), states that "GMO failed to consider uncertainties inherent in the Company's proposed program of emission retrofits and refurbishment at these facilities." MDNR now considers this a concern rather than a deficiency. This issue is resolved by the agreement to a stakeholder process and revised filing contained in Appendix 1, paragraph 11.

14. Dogwood Energy, LLC asserts that GMO fails to distinguish between adequate capacity margin and reliable integration of wind generation into its supply portfolio, or "firming" of wind generation. An adequate capacity margin by today's standards does not guarantee reliable integration of wind generation, particularly as the energy absorbed from such wind generation increases to upwards of 10% to 15% of a utility's total generation production. More specifically, for purposes of an IRP evaluation, a demonstration of adequacy in the following areas is required to demonstrate adequate "firming" of wind resources, at a minimum:

- Availability of adequate amounts of regulation service to accommodate anticipated wind generation output forecast error. This is measured by both available capacity and ramp rate (MW/minute) of such service for both up and down regulation. This requirement could include the need to replace substantially all wind generation output if a high wind event forces the rapid shut-down of all such wind-driven resources.

- Availability of adequate amounts of resource / reserve capacity (spinning and non-spinning) and flexible, rapid-start and shut-down capacity (from 0-4 hours starting and stopping) to accommodate the regular, daily morning decrease and evening increase of wind generation output. This is measured by both available capacity and ramp rate (MW/minute) of such capacity for both up and down load-following requirements, including minimum loading capability of baseload generation for overnight turn-down, as needed to accommodate maximum wind generation output during overnight low demand conditions.

15. Dogwood states that generally, such requirements can be met by uncommitted peaking and intermediate capacity resources equal to at least the capacity of wind resource capacity in the supply portfolio (for regulation purposes), or up to the capacity differential between daily peak demand and the total capacity represented by baseload resources available after meeting overnight minimum generation output limitations. It does not appear that GMO has adequately addressed these wind integration and reliability issues in its IRP in order to guard against blackouts, brownouts and penalties for NERC reliability standards violations.

16. Dogwood believes that risk mitigation procedures and monitoring by the Staff and stakeholders are required to provide greater assurance that GMO will maintain adequate firm capacity reserves on an annual or seasonal basis that will better enable it to meet reliability standards. In order to address this deficiency, GMO should include in its IRP a commitment to develop short-term, annual and peak season capacity supply assessment and procurement plans to be monitored by the Staff and reviewed and commented upon by stakeholders.

17. Additionally, Dogwood asserts that GMO has not addressed potential “adverse rate treatment for the Crossroads units”, meaning a lawful and reasonable Commission decision to

exclude the units from ratebase. GMO has indicated that base and intermediate load capacity would be required if the Crossroads units are excluded, but there is no apparent plan of action. Additionally, potential plant retirements have not been adequately considered, which could result in capacity requirements.

18. Dogwood is willing to allow the foregoing issues to be resolved in the stakeholder process as described in Appendix 1 "Supply-Side Resources Analysis" section.

4 CSR 240-22.050 Demand-Side Resources Analysis

19. Staff's Concern D states: Marketing work done for KCP&L was also used for GMO, with no research done into whether the service areas of the two utilities have different needs - 4 CSR 240-050(5). GMO agrees to analyze and report to the stakeholder group whether this deficiency will be corrected in the revised filing or in the next Chapter 22 compliance filing. GMO further agrees to perform a GMO service territory demand-side market potential study for use in its next Chapter 22 compliance filing. This agreement resolves this concern.

20. Staff's Concern E states: GMO does not discuss the MPower and Energy Optimizer moratoria, program designs or delivery processes - 4 CSR 240-22.050(6). GMO agrees to include a discussion of MPower and Energy Optimizer in conjunction with the agreement to a Stakeholder process and revised filing contained in Appendix 1. This agreement resolves this concern.

21. Staff's Concern F states: The Change-A-Light program in GMO's preferred resource plan is not the same program as the revised Change-A-Light program discussed by the Customer Program Advisory Group - 4 CSR 240-22(6)(D). GMO agrees to provide Change-A-Light information as part of agreement to a stakeholder process and revised filing contained in Appendix 1. This agreement resolves this concern.

22. Staff's Deficiency 1 states: Insufficient and untimely analysis of 'rate structures,' 'demand response research,' multifamily research, and 'energy efficient street lighting' within end-use measure menu creation – 4 CSR 240-22.050(1); 22.020(17) and (18); 22.050(5). GMO agrees to analyze and report to the stakeholder group as described in Appendix 1 whether this deficiency will be corrected in the revised filing or in the next Chapter 22 compliance filing.

23. Staff's Deficiency 2 states: No identification of, development of or screening, of the technical potential of end-use measures for the Energy Optimizer program or for the MPower program – 4 CSR 240-22.050(1), 22.050(3), 22.050(6)(C), and 22.050(4). GMO agrees to identify, develop or screen the technical potential of end-use measures for the Energy Optimizer program and for the MPower program and to report to the stakeholder group as described in Appendix 1 whether this deficiency will be corrected in the revised filing or in the next Chapter 22 compliance filing.

24. Staff's Deficiency 3 states: Lack of analysis of residential 'plug load' items – 4 CSR 22.050(1) and 22.050(5). GMO agrees to analyze and report to the stakeholder group as described in Appendix 1 whether this deficiency will be corrected in the revised filing or in the next Chapter 22 compliance filing.

25. Staff's Deficiency 4 states: DSM programs only last for the first five years of the twenty year planning horizon – 4 CSR 240-22.050(11). GMO agrees to provide the DSM twenty-year information in the revised filing.

26. OPC's Deficiency 1 4 CSR 240-22.050 (3) and (7) – GMO failed to analyze street lighting (and other outdoor lighting) retrofits, alternative rate structures and combined heat and power (CH&P) on the customer side of the meter as end use measures and as Demand-Side programs. GMO agrees to analyze street lighting and CH&P as potential demand-side resources

in its the next full compliance filing. GMO agrees to include alternative rate structures, including, but not limited to, time-of-use (TOU) and peak pricing (critical peak pricing and/or peak time rebates) rates for small and medium sized customers, as demand-side resources in the revised filing.

27. OPC's Deficiency 2. 4 CSR 240-22.050 (6) – GMO failed to comply with the requirement in the rule for it to "develop a set of potential demand-side programs that are designed to deliver an appropriate selection of end-use measures to each market segment." GMO agrees to discuss this topic including the provision of financing as an alternative or supplement to rebates in the stakeholder group as described in Appendix 1. GMO also agrees to provide to stakeholders its research on evaluation of financing efficiency programs referenced in Figure 2 on page 29 of its 2009 IRP Supplemental Filing by June 30, 2010.

28. In what MDNR labels as "MDNR Deficiency #1," MDNR, citing 4 CSR 22.010(2), states that "the filing fails to treat demand-side management resources on an equivalent basis and fails to use minimization of long-run costs as the primary selection criteria." This issue is resolved by the combination of agreements set forth in paragraphs 27 and 31 of this Stipulation and Agreement and paragraphs 14-16, and 21 in the agreement to a stakeholder process and revised filing contained in Appendix 1. Collectively, these agreements address the issues with respect to equivalent treatment that are set forth on pages 2-4 and the issue of minimum NPVRR (net present value of revenue requirements) set forth on pages 4-12 of Optimal Energy's Final Report on the Analysis of Demand Side Management filed on December 10, 2009 as an appendix to MDNR's comments in this case. For its next Chapter 22 compliance filing, GMO agrees to model and fully analyze at least one alternative DSM portfolio that annually achieves incremental electric energy and demand savings equivalent to 1% by 2015 and 2% by 2020

reductions in annual sales and peak requirements, respectively. "Fully analyze" means that the alternative portfolio(s) will be treated as resources that are available for selection in the determination of critical uncertain factors and in the identification of alternative resource plans and that at least one of the alternative portfolios will be included in an alternative resource plan that is included in the integration analysis. The demand-side resources included in these alternative portfolios will fully conform to the definition of "demand side resource" in 4 CSR 240-22.020(11). The alternative portfolio(s) will include energy efficiency programs to achieve energy savings from end-use measure that are not included in the DSM portfolio in GMO's current preferred resource plan. The alternative DSM portfolio(s) will also include energy efficiency programs to achieve increased energy savings from end-use measures that are already included in the DSM portfolio in its current preferred resource plan. For its next Chapter 22 compliance filing, GMO further agrees to perform a GMO service territory demand-side market potential study, to consult with stakeholders on the design of the study and to incorporate the results of the potential study when developing the alternative DSM portfolios.

29. In what MDNR labels as "MDNR Deficiency #8," MDNR, citing 4 CSR 240-22.050(1)C, (1)D and (6)C, states that "GMO failed to include combined heat and power (CHP) and a variety of end-use measures in the menu of demand-side measures that were screened." This issue is resolved by the agreement to a stakeholder process and revised filing contained in Appendix 1, paragraph 18.

30. In what MDNR labels as "MDNR Deficiency #9," MDNR, citing 4 CSR 240-22.050(6)(C), states that "GMO's screening of solar hot water resources may be flawed." GMO agrees to submit in a supplemental filing: the report "A Renewable Energy System Performance Report", dated June 01, 2009, prepared by Bob Solgar, with The Energy Savings Store (TESS).

GMO agrees to continue monitoring changes in costs for solar hot water resources for its next regularly scheduled IRP filing.

31. In what MDNR labels as "MDNR Deficiency #10," MDNR, citing 4 CSR 240-22.050(4), states that "the Company's filing presents multiple estimates of market potential for demand-side resources in its service territory that are internally inconsistent and inconsistent with recommendations of consultants retained by the Company." The company agrees to include in a supplemental filing its revised estimate and an explanation why the revised estimate differs from the estimates discussed in the MDNR December 10, 2009 comments.

32. In what MDNR labels as "MDNR Deficiency #11," MDNR, citing 4 CSR 240-22.050(5), states that "the research that GMO cites to demonstrate its compliance with 4 CSR 240-22.050(5) is not sufficient to develop the information necessary to design and implement cost-effective demand-side programs at a level that meets Company and state policy goals." As resolution, GMO agrees, in consultation with the Signatories to develop a comprehensive research plan that complements its evaluation plan and is targeted at gathering information required to design and implement cost-effective demand-side programs at a level that meets Company and state policy goals. This plan will be filed in a supplemental filing on or before December 17, 2010.

4 CSR 240-22.060 Integrated Resource Analysis

33. Staff's Deficiency 5 states: GMO did not meet the requirements of 4 CSR240-22.060(1), because GMO did not design its alternative resource plans to satisfy at least the objectives and priorities identified in 4 CSR 240-22.010(2). Specifically, the requirement of 4 CSR 240-22.010(2)(A) to consider and analyze demand-side efficiency and energy management measures on an equivalent basis with supply-side alternatives in the resource planning process is

not satisfied – 4 CSR 240-22.060(1). This deficiency is resolved with GMO's agreement to work within the stakeholder process as described in Appendix 1, to expand the DSM portfolio in incremental steps to account for the development of new technologies not currently known or defined.

34. In what MDNR labels as "MDNR Deficiency #12(A)," MDNR, citing 4 CSR 240-22.060(3)(A), states that "the set of alternative resource plans developed for the filing do not meet the requirements of paragraph 33 in the Stipulation and Agreement." (In the Matter of the Resource Plan of Aquila, Inc. d/b/a Aquila Networks-MPS and Aquila Networks L&P, Case No. EO-2007-0298, Non-Unanimous Stipulation and Agreement, November 1, 2007). This issue is resolved by the agreement to a stakeholder process and revised filing contained in Appendix 1, paragraph 21.

35. In what MDNR labels as "MDNR Deficiency #12(B)," MDNR, citing 4 CSR 240-22.060(3), states that "the set of alternative resource plans developed for the filing is not sufficient to adequately review the Company's resource options and identify the optimal alternative for meeting planning objectives." This issue is resolved by the combination of agreements set forth in paragraphs 1 and 23 of this Stipulation and Agreement and paragraph 26 in the agreement to a stakeholder process and revised filing contained in Appendix 1.

36. In what MDNR labels as "MDNR Deficiency #13," MDNR, citing 4 CSR 240-22.060(4)', states that "the filing uses a planning horizon of only 5 years for demand-side resources except for its demand response offerings, Optimizer and MPower. Its modeling shows only five years of implementation budget for DSM programs." In its initial response to this issue, GMO provided 20-year DSM program data in Appendix A of a document titled "GMO RESPONSE TO PARTIES SUMMARY REPORTS OF DEFICIENCIES AND CONCERNS."

The document was circulated among the parties to this case, but not filed. To resolve this deficiency, GMO agrees to comply with paragraphs 22 and 23 in the agreement to a stakeholder process and revised filing contained in Appendix 1; and in addition agrees:

- To provide a supplemental filing that includes Appendix A from the aforementioned document and attests that the program cost data provided in Appendix A was used for all aspects of the integrated analysis of alternative resource plans contained GMO's "all DSM" portfolio"; and
- To provide DSM program data across a 20-year planning horizon in its next regularly scheduled IRP filing.

37. In what MDNR labels as "MDNR Deficiency #14," MDNR, citing 4 CSR 240-22.060(6)(A), states that "Tables 1-24 do not indicate the schedule for resource retirements." The context of MDNR's statement is that the GMO filing cites Volume 6, Tables 1-24 as fulfilling the reporting requirement of 4 CSR 240-22.060(6)(A) to list "the sequence and schedule for retiring existing resources." GMO responded that "Plans 7 through 11 include retiring Sibley Units 1&2 by 2015." (Volume 6, Section 3, page 3) This issue is therefore resolved.

38. In what MDNR labels as "MDNR Deficiency #15," MDNR states that Volume 6, Section 6.2, p. 21 lists the provisions of 4 CSR 240-22.060(6)(B) but "does not provide the tabulation required by the rule." GMO responded that "the tabulation is provided in Volume 7, Table 2, on page 12 to meet the requirements of Rule 240-22.070(5)(A)." This issue is therefore resolved.

39. In what MDNR labels as "MDNR Deficiency #16," MDNR, citing 4 CSR 240-22.060(6)(B), states that the charts provided to comply with this rule are not readable, and the

Company did not provide the underlying data used to generate the charts." MDNR now considers this a concern rather than a deficiency. To resolve this concern, GMO agrees:

- GMO, in consultation with the Signatories, will consider user-friendly methods for complying with the requirements of 4 CSR 240-22.070(5)(A) in its next regularly scheduled IRP filing; and
- GMO will make a supplemental filing that lists the source for the data underlying its Tables 1-24. These tables were circulated among the parties to this case, but not filed in "GMO RESPONSE TO PARTIES SUMMARY REPORTS OF DEFICIENCIES AND CONCERNS."

4 CSR 240-22.070 Risk Analysis and Strategy Selection

40. Staff's Concern G states: GMO did not treat the list of uncertain factors contained in 4 CSR 240-22.070(2) as a "minimum requirement" and did not add any additional uncertain factors that are "special contemporary issues," issues including Smart Grid and EERS – 4 CSR 240-22.070(2). This concern is resolved by GMO's agreement to add smart grid technology and EERS legislation to its list of uncertain factors and to screen these uncertain factors to determine whether each is a critical uncertain factor. GMO agrees to do the screening of the smart grid and EERS uncertain factors taking into account the results of the stakeholder meetings and supplemental filings described in Appendix 1, "Risk Analysis and Strategy Selection". If smart grid and EERS are both determined to not be critical uncertain factors, Staff's Concern G is resolved. However, if the smart grid uncertain factor or the EERS uncertain factor is determined to be a critical uncertain factor, and GMO does not change its MIDAS model to include the smart grid and/or EERS determined to be a critical uncertain factors during the integration analysis used for the revised filing in this case, then Staff's Concern G is not resolved.

41. Staff's Concern H states: GMO eliminated Plan 16 from consideration as its preferred resource plan simply because GMO considered Plan 16 to be an unachievable resource plan – 4 CSR 240-22.070(6). The resolutions of Staff deficiencies 5 and 6 resolve this concern.

42. Staff's Deficiency 6 states: GMO has failed to meet the requirements of 4 CSR 240-22.070(6)(A) in that the preferred resource plan does not "strike an appropriate balance between the various planning objectives specified in 4 CSR 240-22.010(2), more specifically 4 CSR 240-22.010(2)(A). This deficiency is resolved by GMO's agreement to work within the stakeholder process as described in Appendix 1, to expand the DSM portfolio in incremental steps to account for the development of new technologies not currently known or defined.

43. OPC's Deficiency 3. 4 CSR 240-22.070(11)(F) - Failure to include a discussion of the process used to select the preferred plan. This deficiency is resolved by GMO's agreement to include an expanded discussion of the process used to select the preferred plan that meets the requirements of 4 CSR 240-22.070(11)(F) in the revised IRP filing.

44. OPC's Deficiency 4. 4 CSR 240-22.070(10) and 4 CSR 240-22.080(1)(D) - Failure to officially adopt and approve a resource acquisition strategy. This deficiency is resolved by the revised resource acquisition strategy corporate approval statement contained in Appendix 2 which by this reference is incorporated herein. The revised resource acquisition strategy corporate approval statement will be signed and filed as a supplement to the August 2009 IRP filing. The revised resource acquisition strategy corporate approval statement will be signed and included as part of the revised IRP filing.

45. In what MDNR labels as "MDNR Deficiency #17," MDNR, citing 4 CSR 240-22.070(2)(A), states that "(A) The methodology used by KCP&L-GMO to identify critical uncertain factors relies on inappropriately specified alternative resource plans and the validity of

the Company's estimates of "high" and "low" values for the uncertain factor. (B) MDNR questions whether the methodology used by KCP&L-GMO to identify critical uncertain factors is appropriate." After discussion, MDNR agrees with GMO that GMO's method for identifying critical uncertain factors does not rely on the specification of alternative resource plans. The remaining issue concerning validity of the Company's estimates of "high" and "low" values for the uncertain factor is resolved through the agreement to a stakeholder process and revised filing contained in Appendix 1, paragraph 15.

46. In what MDNR labels as "MDNR Deficiency #18," MDNR, citing 4 CSR 240-22.070(10), states that "the statements on Volume 7A, page 4... does not meet the requirement in 4 CSR 240-22.070(10) because it does not state unambiguously that the Company has committed to the course of action specified in the resource acquisition strategy." This issue is resolved by Appendix 2.

47. Dogwood Energy, LLC asserts that GMO has not adequately addressed covariant risks. Dogwood is willing to allow the foregoing issue to be resolved in the stakeholder process as described in Appendix 1 "Risk Analysis and Strategic Selection" section.

4 CSR 240-22.080 Filing Schedule and Requirements

48. OPC's Deficiency 5. 4 CSR 240-22.080(2) - GMO's request for non-traditional accounting procedures for DSM expenses does not fully comply with the modeling requirements of this section of the rule and the filing raises additional concerns due to new issues that are raised and yet to be resolved by the new energy efficiency legislation, SB 376 that was passed this year by the Missouri Legislature. The modeling requirements issue will be discussed and possibly resolved by agreeing to use the stakeholder process as described in Appendix 1 "DSM Cost Recovery Modeling" section. GMO agrees to withdraw the request for non-traditional

accounting procedures that it made pursuant to 4 CSR 240-22.080(2) in its August 2009 IRP compliance filing and reserves the right to make a new request for non-traditional accounting procedures in its revised IRP filing in December 2010.

49. In what MDNR labels as "MDNR Deficiency #20," MDNR, citing 4 CSR 240-22.080(2), states that "KCP&L-GMO has not complied with the requirement to submit its proposal "in the utility's compliance filing pursuant to this rule and not at some subsequent time." MDNR does not question that GMO's proposal included in Volume 8, section 2 of the Company's filing is consistent with 4 CSR 240-22.080(2). The deficiency cited here refers to an alternative, substantively different proposal that GMO submitted to MDNR on November 10, 2009 in response to MDNR's Data Request 45. This issue has been resolved by agreeing to use the stakeholder process as described in Appendix 1 "DSM Cost Recovery Modeling" section. GMO agrees to withdraw the request for non-traditional accounting procedures that it made pursuant to 4 CSR 240-22.080(2) in its August 2009 IRP compliance filing and reserves the right to make a new request for non-traditional accounting procedures in its revised IRP filing in December 2010.

Effect of Nonunanimous Stipulation and Agreement

50. None of the Signatories shall be deemed to have approved or acquiesced in any question of Commission authority, accounting authority order principle, cost of capital methodology, capital structure, decommissioning methodology, ratemaking or procedural principle, valuation methodology, cost of service methodology or determination, depreciation principle or method, rate design methodology, jurisdictional allocation methodology, cost allocation, cost recovery, or question of prudence, that may underlie this Nonunanimous

Stipulation and Agreement, or for which provision is made in this Nonunanimous Stipulation and Agreement.

51. This Nonunanimous Stipulation and Agreement represents a negotiated settlement. Except as specified herein, the Signatories to this Nonunanimous Stipulation and Agreement shall not be prejudiced, bound by, or in any way affected by the terms of this Nonunanimous Stipulation and Agreement: (i) in any future proceeding; (ii) in any proceeding currently pending under a separate docket; and/or (iii) in this proceeding should the Commission decide not to approve this Nonunanimous Stipulation and Agreement, or in any way condition its approval of same.

52. The provisions of this Nonunanimous Stipulation and Agreement have resulted from extensive negotiations among the Signatories and the provisions are interdependent. In the event that the Commission does not approve and adopt the terms of this Nonunanimous Stipulation and Agreement in total, or approves this Nonunanimous Stipulation and Agreement with modifications or conditions that a Signatory objects to, it shall be void and no Signatory shall be bound, prejudiced, or in any way affected by any of the agreements or provisions hereof.

53. When approved and adopted by the Commission, this Nonunanimous Stipulation and Agreement shall constitute a binding agreement between the Signatories hereto. The Signatories shall cooperate in defending the validity and enforceability of this Nonunanimous Stipulation and Agreement and the operation of this Nonunanimous Stipulation and Agreement according to its terms. Nothing in this Nonunanimous Stipulation and Agreement is intended to impinge, restrict or limit in any way any party's discovery powers, including the right to access information and investigate matters related to GMO.

54. This Nonunanimous Stipulation and Agreement does not constitute a contract with the Commission. Acceptance of this Nonunanimous Stipulation and Agreement by the Commission shall not be deemed as constituting an agreement on the part of the Commission to forego, during the term of this Nonunanimous Stipulation and Agreement, the use of any discovery, investigative or other power of the Commission. Thus, nothing in this Nonunanimous Stipulation and Agreement is intended to impinge or restrict in any manner the exercise by the Commission, or of any Signatory, of any statutory right, including the right to access information, or any statutory obligation.

Commission Approval of Nonunanimous Stipulation and Agreement

55. If the Commission has questions for the Signatories, the Signatories will make available, at any on-the-record session, their experts/witnesses and attorneys so long as all Signatories have had adequate notice of that session. The Signatories agree to cooperate in presenting this Nonunanimous Stipulation and Agreement to the Commission for approval, and will take no action, direct or indirect, in opposition to the request for approval of this Nonunanimous Stipulation and Agreement.

56. If the Commission does not unconditionally approve this Nonunanimous Stipulation and Agreement without modification, and notwithstanding its provision that it shall become void thereon, neither this Nonunanimous Stipulation and Agreement, nor any matters associated with its consideration by the Commission, shall be considered or argued to be a waiver of the rights that any Signatory has to a hearing on the issues presented by the Nonunanimous Stipulation and Agreement, for cross-examination, or for a decision in accordance with Section 536.080 RSMo 2000 or Article V, Section 18 of the Missouri Constitution, and the Signatories shall retain all procedural and due process rights as fully as though this Nonunanimous Stipulation and

Agreement had not been presented for approval, and any suggestions or memoranda, testimony or exhibits that have been offered or received in support of this Nonunanimous Stipulation and Agreement shall thereupon become privileged as reflecting the substantive content of settlement discussions and shall be stricken from and not be considered as part of the administrative or evidentiary record before the Commission for any further purpose whatsoever.

57. In the event the Commission accepts the specific terms of this Nonunanimous Stipulation and Agreement, the Signatories waive their respective rights to call, examine and cross-examine witnesses, pursuant to Section 536.070(2) RSMo 2000; their respective rights to present oral argument and written briefs pursuant to Section 536.080.1 RSMo 2000; their respective rights to the reading of the transcript by the Commission pursuant to Section 536.080.2 RSMo 2000; their respective rights to seek rehearing, pursuant to Section 386.500 RSMo 2000; and their respective rights to judicial review pursuant to Section 386.510 RSMo 2000. This waiver applies only to a Commission Report and Order respecting this Nonunanimous Stipulation and Agreement issued in this proceeding, and does not apply to any matters raised in any subsequent Commission proceeding, or any matters not explicitly addressed by this Nonunanimous Stipulation and Agreement.

Issues Unresolved by Nonunanimous Stipulation and Agreement

58. In what MDNR labels as "MDNR Deficiency #19," MDNR, citing 4 CSR 240-22.070(10)(D), states that "the methodology adopted by KCP&L-GMO for compliance with the requirements of 4 CSR 240-22.070(10)(D) does not account for the volatile and continuous nature of these critical prices and interest rates. Additionally, this methodology does not fully capture the interaction of different factors in creating circumstances that will warrant a change in resource plan." GMO will provide supporting documentation showing the calculation of

"Conditional Probability" values listed in the Risk Tree provided in Figure 1, Volume 7, Page 10 of the initial GMO filing. On April 6, 2010 GMO provided MDNR some supplementary information regarding the probabilities assigned to each scenario listed in the Risk Tree. This information did not resolve MDNR's concerns about the calculation of the probabilities associated with the scenarios listed in the Risk Tree figures.

59. In what MDNR labels as "MDNR Deficiency #21," MDNR, citing 4 CSR 240-22.080(2), states that " KCP&L-GMO's proposed performance incentive mechanism would provide excessive returns compared to normal regulatory practice. In MDNR's view, the goals for demand-side program savings included in KCP&L-GMO's preferred resource plan do not achieve meaningful levels of savings. KCP&L-GMO's proposed performance incentives are not appropriate relative to its level of proposed DSM investments and risk." GMO agrees to withdraw the request for non-traditional accounting procedures that it made pursuant to 4 CSR 240-22.080(2) in its August 2009 IRP compliance filing and reserves the right to make a new request for non-traditional accounting procedures in its revised IRP filing in December 2010. The issue of non-traditional accounting procedures will be discussed and may be resolved, in the stakeholder process described in the "DSM Cost Recovery Modeling" section of Appendix 1.

60. In what MDNR labels as "MDNR Deficiency #22," MDNR, citing 4 CSR 240-22.080(2), states that " KCP&L-GMO's proposed performance incentive mechanism would provide excessive returns compared to normal regulatory practice. In MDNR's view, the goals for demand-side program savings included in KCP&L-GMO's preferred resource plan do not achieve meaningful levels of savings. KCP&L-GMO's proposed performance incentives are not appropriate relative to its level of proposed DSM investments and risk." GMO agrees to withdraw the request for non-traditional accounting procedures that it made pursuant to 4 CSR

240-22.080(2) in its August 2009 IRP compliance filing and reserves the right to make a new request for non-traditional accounting procedures in its revised IRP filing in December 2010. The issue of non-traditional accounting procedures will be discussed and may be resolved, in the stakeholder process described in the "DSM Cost Recovery Modeling" section of Appendix 1.

Respectfully submitted,

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Counsel for Dogwood Energy, LLC
Dated: April 12, 2010

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all counsel of record either by electronic mail or by first class mail, postage prepaid, on this 12th day of April, 2010.

/s/ James M. Fischer
James M. Fischer

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

In the Matter of the 2009 Resource Plan of)	
KCP&L Greater Missouri Operations Company)	Case No. EE-2009-0237
Pursuant to 4 CSR 240-22)	

KCP&L Greater Missouri Operations Company

2009 Integrated Resource Plan

STAKEHOLDER PROCESS AGREEMENT

Appendix 1

to Nonunanimous Stipulation and Agreement

STAKEHOLDERS PROCESS AGREEMENT

1. KCP&L Greater Missouri Operations Company ("GMO"), the Staff of the Missouri Public Service Commission ("Staff"), the Office of Public Counsel ("OPC"), the Missouri Department of Natural Resources ("MDNR"), and Dogwood Energy, LLC ("Dogwood") (collectively, the "Parties") hereby agree to the following process for a series of stakeholder meetings, supplemental filings and a revised integrated resource plan ("revised IRP") designed to remedy certain, but not all, alleged deficiencies and concerns expressed by the signatories of the Nonunanimous Stipulation and Agreement to which this Agreement is appended regarding the compliance filing GMO submitted in this proceeding on August 5, 2009. Sedalia Industrial Energy Users' Association ("SIEUA"), the City of Kansas City, Missouri ("KCMO"), and the Missouri Joint Municipal Electric Utility Commission ("MJMEUC") intervened in this case but are not signatories to the Nonunanimous Stipulation and Agreement to which this Agreement is appended. SIEUA, KCMO, and MJMEUC are not expected to participate in the stakeholder process, but the parties hereto do not oppose their participation.

BACKGROUND

2. On August 5, 2009, GMO submitted its compliance filing with Chapter 22 of the Commission's regulations concerning GMO's resource planning. GMO submitted a supplemental filing on November 2, 2009 to provide additional information and clarify certain aspects of its original filing (collectively, "2009 IRP").

3. On December 10, 2009, Staff, OPC, MDNR, and Dogwood submitted reports identifying concerns and in some cases alleging certain deficiencies regarding GMO's 2009 IRP. Although SIEUA, KCMO, and MJMEUC intervened in the case, they did not submit any reports.

4. The Commission's resource planning regulations provide that if the Staff, Public Counsel or any intervenor finds deficiencies, they shall work with the electric utility and the other parties in an attempt to reach a joint agreement on a plan to remedy the identified deficiencies. 4 CSR 240-22.080(8). The Parties have worked together to develop a joint agreement on a plan. The Parties agree that a stakeholder process will serve as a productive means of planning and implementing remedies for certain identified deficiencies. This Stakeholder Process Agreement Appendix represents the fruits of those efforts.

5. The terms of this agreement provide unequivocally for GMO to make supplemental filings and to file a revised IRP, and GMO agrees to file supplements and a revised IRP consistent with the terms of and schedule outlined in this agreement. The parties agree that one of the objectives of the meetings described and scheduled herein is to discuss and attempt to come to terms regarding specific action items and elements to be addressed in the supplements and revised IRP to be filed by GMO.

6. The parties reserve the right to take any disputes concerning implementation or action items related to GMO's IRP, revised IRP or supplemental filings to the Commission for resolution, and parties do not otherwise waive their rights under 4 CSR 240-22.

SCOPE, TERMS AND TIMELINE OF STAKEHOLDERS PROCESS

TO REMEDY CONCERNS AND ALLEGED DEFICIENCIES

4 CSR 240-22.030 Load Analysis and Forecasting:

7. GMO commits to provide in a presentation to a stakeholder meeting a comparison of the new budget forecast and the forecast underlying the 2009 IRP on a total company basis (i.e. roll up both forecasts to the total company in order to see and

compare differences). GMO further commits to use the work that examined the critical uncertain factors in the 2009 IRP to determine if the change in the load forecast is significant enough to warrant using the budget forecast for a revised IRP filing. This determination will take into account the interaction of the revised load forecast with revision of other demand- and supply-side resources and uncertain factors that are included in integrated analysis. If production of a new load forecast is warranted, the new load forecast will be included in the revised IRP scheduled to be filed on December 17, 2010.

8. GMO will include in a supplemental filing this presentation with the comparison and the resulting action to be taken, if any.

Timeline: Stakeholder meeting and presentation: April, 2010

Supplemental filing: 30 days after meeting

Revised IRP filing: December 17, 2010

4 CSR 240-22.040 Supply-Side Resource Analysis:

Retirements, Wind Integration and Contingency Planning

9. GMO commits that retirement of specific units will be discussed at a Stakeholder meeting. The Parties agree that this discussion will include consideration of Sibley 3 and will extend over at least two meetings beginning May 2010.

10. As the starting point of the discussion, GMO will provide (a) its load and capacity table; and (b) a tabulation of all supply-side and demand-side resources that were considered in developing alternative resource plans for the August 2009 filing.

11. GMO and the other Parties agree to discuss combinations of demand and supply side resources that would be sufficient to replace the energy and capacity

currently provided by the Sibley 3 unit and that would be sufficient to replace the energy and capacity that Sibley 3 is projected to provide in future years if the unit undergoes the program of environmental retrofits that is proposed by the company. This discussion may include resources that do not appear on the tabulation of resources provided by GMO. The expected impact of proposed retrofits on the unit's heat rate and capacity factor will also be discussed. Through this discussion, GMO and the other Parties will work to define one or several combinations of resources that appear most likely to provide the least cost replacement for the Sibley 3 unit if that unit is retired. Based on this discussion, GMO agrees to develop at least one alternative resource plan that includes retirement of Sibley 3 and to include this alternative resource plan in the revised integration analysis for the filing due December 17, 2010.

12. In addition to retirements, these meetings will also include discussions regarding reliable wind integration and contingency supply planning.

Cost of Wind Generation

13. GMO commits to present the results of the most recent request for proposal responses received in February, 2010 for new wind construction compared to the wind resource cost utilized in the IRP. GMO also commits that the change in costing to the newest information will be examined in light of the construction cost critical uncertainty factor. Should the change in construction cost for wind resources including associated transmission costs exceed the threshold for reconsideration due to the critical uncertainty factor, GMO will incorporate the new wind cost in a revised IRP filing. GMO

will include in a supplemental filing this presentation and comparison and the resulting action taken if any.

Distribution of Future Values of Uncertain Factors that Affect Supply Side Resource Costs

14. At the May 2010 stakeholder meeting, GMO and the parties will discuss factors that should be considered and methodologies that should be used to estimate the range of values for uncertain factors affecting supply side resources - specifically, future natural gas prices and the future cost of complying with regulatory requirements related to NOx and SO2 emissions. MDNR notes that by the end of May 2010, EPA is expected to publicly announce its proposal for replacing the CAIR rule.

15. If Monte-Carlo analysis of future SO2 and NOx allowance prices is determined to be appropriate, GMO will determine "low", "mid" and "high" forecast values for NOx and SO2 allowances using this method.

16. If a revised analysis of these uncertain factors is determined to be appropriate, GMO will include the results of a revised analysis in its identification of critical uncertain factors and its integration analysis due December 17, 2010.

17. GMO commits to include discussions regarding reliable wind integration and contingency supply planning.

Timeline: Stakeholder meetings and presentation: May, 2010 and June, 2010

Supplemental filing: 30 days after last meeting

Revised IRP filing: December 17, 2010

4 CSR 240-22.050 Demand-Side Resource Analysis:

Menu of End Uses:

18. GMO commits to discussion of the appropriate menu of DSM end-use measures at stakeholder meetings in April and May. The other Parties will provide their proposed list of additional end-uses measures to be included in GMO's next IRP filing. In addition to the lists, the same Parties will provide a methodology to identify and estimate the technical potential, cost, and energy/demand impact of those measures not currently in the 2009 IRP and the economic and achievable potential of programs containing those measures that would be acceptable to them. The proposal needs to consider any new measures in terms of weather-sensitivity. Parties may also propose methods for ongoing identification of "pockets of opportunity" for new DSM measures and programs that may not be evident or achievable at this time. GMO commits to work with the other Parties to reach agreement on the end-use issue.

19. Upon agreement to the list of end-uses to be evaluated and agreement with the methodology to estimate technical potential, cost, and energy/demand impact, GMO will include in a supplemental filing the agreed to end-use list and agreed-to methodology to be used. The supplemental filing will identify which of the agreed-to additional end-use measures will be included in GMO's next IRP filing. The Supplemental Filing will include a schedule for any specific studies needed and reporting back to the parties.

Alternative Levels of DSM Program Implementation

20. At the April 2010 stakeholder meeting, GMO will present its estimate of market potential for DSM savings based on the programs included in the "All-DSM"

portfolio. This information will be included in a supplemental filing. The presentation and supplemental filing are intended to resolve inconsistencies in the estimates included in the August, 2009 IRP filing.

* 21. GMO agrees to include one or more portfolios of new DSM programs in addition to the all-DSM portfolio in the revised IRP scheduled to be filed December 17, 2010. At least one of these additional portfolio(s) of DSM programs will incorporate a more aggressive level of DSM implementation than the "all-DSM" portfolio. These additional portfolios will be treated as resources that are available for selection of alternative resource plans that are included in the integrated analysis. Agreement on criteria to be met by the additional, alternative portfolio will be discussed at the April and May 2010 stakeholder meetings and decided prior to the June 2010 stakeholder meeting.

DSM Programs/20 Year Plan

22. GMO states that it modeled DSM programs for the entire 20 year planning horizon. However, GMO's DSM programs in this IRP filing:

1. Were developed under the assumptions that there will be no future impact from: 1) smart grid technology, and/or 2) legislation to impose a federal or state EERS; and
2. Take credit for energy and demand reductions annually over the measure life, but takes no credit for energy and demand reductions annually as a result of either market transformation and/or replacement of measures with more efficient measures as a result of DSM program enhancements.

23. At the April 2010 stakeholder meeting, GMO will respond to the following two questions with respect to the 20-year DSM planning that is presented in Tables 73

through 147 in Appendix A of GMO's February 5 response to parties. For the programs that are shown in these tables to have impacts that extend over a 20-year time horizon:

- a. Did the integrated resource modeling for the filing include more than five years of implementation budget?
- b. Do the implementation plans in GMO's officially adopted resource acquisition strategy include expenditure of funds to acquire new demand-side resources for more than the first five years of the planning horizon?

24. It is noted that the uncertain factors of high carbon costs and high development of smart grid technology, when taken together, creates a scenario which is similar to the "High Infrastructure Costs" scenario in the AmerenUE DSM Market Potential Study. GMO is not aware of DSM resource planning best practices to deal with these uncertain factors, but will evaluate information in the AmerenUE DSM Market Potential Study. GMO agrees that its next compliance filing will include completion and use of a GMO service territory demand-side market potential study. GMO agrees to provide updates on the progress of performing the GMO service territory demand-side market potential study as part of at all stakeholder meetings beginning with the September 2010 stakeholder meeting.

25. The Parties recognize that GMO will likely have to take a "top-down and bottom-up" approach to developing DSM resources for its next IRP filing. The Parties agree that should a "top-down and bottom-up" approach be necessary and desired by GMO, that the other Parties will support approval of such a waiver request by GMO for use in the revised IRP.

Timeline: Stakeholder meetings and presentation: April and May, 2010

Supplemental filing: 30 days after last meeting

Revised IRP filing: December 17, 2010

4 CSR 240-22.070 Risk Analysis and Strategy Selection:

26. GMO agrees to add smart grid technology and EERS legislation to its list of uncertain factors and to screen these uncertain factors to determine whether each is a critical uncertain factor. GMO agrees to do the screening of the smart grid and EERS uncertain factors taking into account the results of the stakeholder meetings and supplemental filings described in this document regarding:

1. Load forecast;
2. End-use measures;
3. DSM programs/20-year plan;
4. Retirements, wind integration and contingency planning; and
5. Cost of wind generation

27. GMO believes it is appropriate to use the results of the Risk Analysis to examine any change that would impact a critical uncertain factor to evaluate the need to conduct further analysis. To the extent any fact, condition, cost, or forecast mentioned previously causes a critical uncertain factor to be exceeded, GMO commits to produce a revised IRP with the critical uncertain factor modified.

28. GMO commits that the stakeholder meetings will include discussion and evaluation of best practices for integration analysis and risk analysis, including practices for addressing covariant risks. The involved group would consist of the four IOUs

(AmerenUE, Empire District, KCP&L, GMO), Staff, OPC, MDNR and Dogwood Energy, to the extent such entities are willing to participate.

29. GMO will work with the stakeholders to understand and evaluate the creation of future scenarios for use in its integration analysis of alternative resource plans.

4 CSR 240-22.080 Filing Schedule and Requirements:

DSM Cost Recovery Modeling

30. Some aspects of DSM cost recovery (cost, lost revenue and incentives) can not be treated as an uncertain factor as part of modeling required by the IRP rule and modeled using the MIDAS model by GMO. However, GMO and the other Parties agree that at the completion of the revised integration analysis (through MIDAS modeling) GMO will use a spreadsheet analysis approach to quantify the impact on company revenues and earnings resulting from the preferred resource plan selected by GMO in its revised IRP filing, both with and without the non-traditional accounting procedures requested in GMO's 2010 revised IRP filing and any associated ratemaking treatment to be sought by GMO for demand-side resources. GMO's revised filing will include discussion and identification of an alternative resource plan as a contingency option should GMO determine there to be inadequate DSM cost recovery available to it and an alternative resource acquisition strategy is thus preferred. This stakeholder process agreement does not limit the rights of stakeholders to respond to GMO's assessment of the adequacy of DSM cost recovery or to GMO's proposals for contingency options related to DSM cost recovery that are made in its revised IRP filing.

Timeline: Stakeholder meeting and presentation: June, 2010

Supplemental filing: 30 days after last meeting

Revised IRP filing: December 17, 2010

31. GMO agrees to continue working with the Parties to develop appropriate methodologies to calculate the financial impacts of DSM cost recovery, including GMO's proposals for recovering its DSM expenditures and receiving any additional revenues associated with DSM programs related to financial incentives, or decoupling, or recovery of lost revenues. The results of GMO's work to develop these appropriate methodologies will be shared with stakeholders in order to obtain their feedback prior to finalizing these methodologies and using them as described above in the revised IRP filing.

Workpapers

32. GMO commits that the filing of workpapers in a supplemental filing will be discussed at a Stakeholder meeting. Workpapers were provided to the other Parties, but were not filed due to the volume of files and information. Should the Parties decide that they all want all workpapers previously provided via CD filed, GMO will begin filing all workpapers beginning with the next IRP.

33. Regarding the 2009 IRP filing, GMO will provide a complete copy of all workpaper CDs to any and all other Parties upon request. If there is a need to discuss the content and organization of the CDs and files, GMO will make itself available to any and all other Parties upon request to provide guidance and assistance.

Summary Schedule of Meetings and Actions

1. April 2010 stakeholder meeting

- a. Load Forecasting
 - b. DSM Programs/20-year plan
 - c. Menu of End-Use Measures
 - d. Alternative Levels of DSM Program Implementation
- 2. May 2010 stakeholder meeting
 - a. Cost of Wind Generation
 - b. Menu of End-Use Measures
 - c. Alternative Levels of DSM Program Implementation
 - d. Alternative Rate Structures
 - e. DSM cost recovery proposals and modeling
 - f. Retirements, Wind Integration and Contingency Planning
 - g. Distribution of Future Values of Uncertain Factors
- 3. May 2010 Supplemental Filing (within 30 days of April meeting)
 - a. Load Forecasting
 - b. Cost of Wind Generation
- 4. June 2010 Stakeholder Meeting
 - a. Integration Analysis discussion of inputs and process
 - b. Distribution of Future Values of Uncertain Factors
 - c. Risk Analysis
- 5. June 2010 Supplemental Filing – Supply/Retirements and Menu of End-Use Measures (within 30 days of May meeting)
- 6. July 2010 Supplemental Filing – Integration and Risk Analysis (within 30 days of June meeting)
- 7. September 2010 Stakeholder Meeting
 - a. Market Potential Study Update
- 8. October, 2010 Stakeholder Meeting
 - a. Review DSM Cost Recovery Analysis (early November)
 - b. Review of results prior to drafting revised IRP documents for filing by December 17, 2010
 - c. Market Potential Study Update
- 9. Additional Supplemental Filings within 30 days of agreement on specific topics:
 - a. Menu of End Uses
 - b. Alternative Levels of DSM Program Implementation
- 10. Revised IRP Filing December 17, 2010

Dated: April 12, 2010

**In the Matter of the 2009 Resource Plan of
KCP&L Greater Missouri Operations Company
Pursuant to 4 CSR 240-22**

)
) Case No. EE-2009-0237
)

2009 Integrated Resource Plan

Appendix 2

To Nonunanimous Stipulation and Agreement

**KCP&L GREATER MISSOURI OPERATIONS COMPANY
2009 INTEGRATED RESOURCE PLAN
CORPORATE APPROVAL STATEMENT FOR
RESOURCE ACQUISITION STRATEGY**

The 2009 Integrated Resource Plan ("IRP") of KCP&L-Greater Missouri Operations Company ("GMO") was prepared under our direction and control. This includes eight (8) Volumes that comprise the IRP. To the best of our knowledge, information, and belief, the methods used and the procedures followed by GMO in formulating the resource acquisition strategy contained in the IRP comply with the provisions of Chapter 22 of the regulations of the Missouri Public Service Commission ("Commission") subject to waivers previously granted by the Commission. GMO has approved the Resource Acquisition Strategy shown as Appendix 7A.

As required by 4 CSR 240-22.080(10) the referenced resource acquisition strategy includes: 1) the Preferred Resource Plan, 2) an implementation plan for the new resource additions included in the Preferred Resource Plan, 3) ranges of the critical uncertain factors, 4) contingency options, and 5) monitoring and reporting processes of the critical uncertain factors. Pursuant to the requirements of the Commission's regulations, GMO will notify the Commission if GMO determines that circumstances have changed so that the Preferred Resource Plan identified in GMO's 2009 Integrated Resource Plan is no longer appropriate.

William H. Downey
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KCP&L Greater Missouri Operations Company

Todd Kobayashi
Vice President, Strategy and Risk Management
KCP&L Greater Missouri Operations Company