

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

In the Matter of the Application of Kansas City)
Power & Light Company for Authority to)
Encumber Certain Clean Cities Equipment.)

Case No. EO-2011-0090

STAFF RECOMMENDATION TO APPROVE APPLICATION, WITH CONDITION

COMES NOW, the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”) and for its *Recommendation to Approve Application, with Condition* (“*Recommendation*”) states as follows:

1. On September 24, 2010 Kansas City Power & Light Company filed its *Application* requesting authority from the Missouri Public Service Commission Authority to encumber certain alternative fuel infrastructure equipment used for charging electric vehicles (“Clean Cities Equipment”).

2. The total amount of equipment to be subject to the encumbrance is *approximately* \$40,000.00 to \$90,000.00.

3. The requested encumbrance would allow KCP&L to receive up to \$14,999,905.00 from the Department of Energy in conjunction with the DOE’s Midwest Regional Alternative Fuels Project. According to KCPL’s Assistance Agreement with the DOE, KCP&L’s monetary contribution to the project is expected to be \$16,744,883.00.

4. Staff has reviewed KCP&L’s September 24, 2010 *Application* and finds the information in the *Application* to be consistent with the information KCP&L presented and discussed in previous stakeholder meetings.

5. Staff recommends that the Commission approve KCP&L’s request to encumber the Clean Cities equipment, subject to the condition in the following proposed ordered paragraph:

That nothing in the Commission's order shall be considered a finding by the Commission of the value of this transaction for rate making purposes, and that the Commission reserves the right to consider the rate making treatment to be afforded this transaction in any future proceedings.

WHEREFORE, Staff respectfully requests that the Commission grant KCP&L the authority to encumber certain Clean Cities equipment, conditioned as specified above.

Respectfully submitted,

/s/ Meghan McClowry
Meghan E. McClowry
Legal Counsel
Missouri Bar No. 63070

Attorney for the Staff of the
Missouri Public Service Commission
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Jefferson City, MO 65102
(573) 751-6651 (Telephone)
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 15th day of October, 2010.

/s/ Meghan McClowry

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EO-2011-0090, Kansas City Power & Light Company

FROM: David Murray, Acting Utility Regulatory Manager
John Rogers, Utility Regulatory Manager

David Murray 10/15/10
Financial Analysis Department / Date

John Rogers 10/15/10
Energy Department / Date

Meghan McClowry 10/15/10
Staff Counsel's Office / Date

SUBJECT: Staff's Recommendation to Approve the Kansas City Power & Light Company's Request
for Commission Authority to Encumber Certain Clean Cities Equipment

DATE: October 15, 2010

On September 24, 2010, Kansas City Power & Light Company ("KCPL") filed an Application to request authority from the Missouri Public Service Commission to encumber certain alternative fuel infrastructure equipment used for charging electric vehicles ("Clean Cities Equipment"). The Application indicates the amount of the lien that the Department of Energy ("DOE") will have on this equipment will be in the range of \$40,000 to \$90,000. This application is not a request to issue financing in conjunction with the proposed encumbrance of the Clean Cities Equipment.

Although, KCPL's requested encumbrance is for a nominal amount, it is important to note that the requested encumbrance only covers the specific Clean Cities Equipment assets and not a request for encumbrance of KCPL's general plant and equipment used to provide service to all customers. Consequently, Staff recommends the Commission conditionally approve KCPL's requested encumbrance.

During 2010, members of the Commission's Staff, the Office of Public Counsel and the Department of Natural Resources participated in a series of stakeholder meetings with KCPL to review and to provide advice on KCPL's plans for the Project. Staff has reviewed KCPL's September 24, 2010 Application and finds information in the Application to be consistent with the information KCPL presented and discussed in previous stakeholder meetings.

Staff recommends that the Commission, with the condition following presented as a proposed ordered paragraph, authorize KCPL to encumber the Clean Cities Equipment described in its Application, as requested by KCPL in its application:

1. That nothing in the Commission's order shall be considered a finding by the Commission of the value of this transaction for rate making purposes, and that the Commission reserves the right to consider the rate making treatment to be afforded this transaction in any future proceeding.

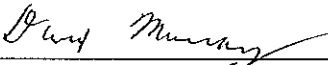
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas City)
Power & Light Company for Authority to)
Encumber certain Clean Cities Equipment) Case No. EO-2011-0090

AFFIDAVIT OF DAVID MURRAY

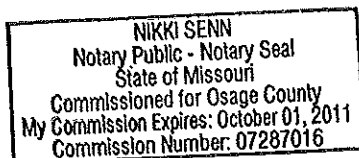
STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

David Murray, of lawful age, on his oath states: that he has participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was developed by him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true and correct to the best of his knowledge and belief.



David Murray

Subscribed and sworn to before me this 14th day of October, 2010.





Notary Public


BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of)	
Kansas City Power & Light Company)	
for Authority to Encumber certain Clean)	Case No. EO-2011-0090
Cities Equipment)	

AFFIDAVIT OF JOHN A. ROGERS

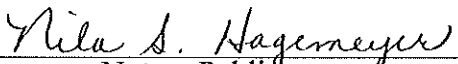
STATE OF MISSOURI)	
)	ss
COUNTY OF COLE)	

John A. Rogers, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



John A. Rogers

Subscribed and sworn to before me this 15th day of October, 2010.



Notary Public

