

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

In the Matter of Kansas City Power & Light Company )  
And KCP&L Greater Missouri Operations Company's ) **File No. EO-2014-0189**  
Application for Approval of Cost Allocation Manual )

**STAFF RESPONSE TO COMMISSION ORDER DIRECTING FILING**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), by and through Staff Counsel's Office, and responds to the November 30, 2018, Order Directing Filing of the Missouri Public Service Commission suggesting that this file respecting Kansas City Power & Light Company ("KCP&L") can be closed. In support thereof, Staff states as follows:

1. In its November 30, 2018, Order Directing Filing, the Commission ordered its Staff to state whether this file can be closed.

2. In File No. ER-2016-0285, a Non-Unanimous Partial Stipulation And Agreement was filed on February 10, 2017, signed by KCP&L, Staff, Office of the Public Counsel ("Public Counsel"), and Midwest Energy Consumers Group. Among the specific issues listed and addressed as settled was the Cost Allocation Manual ("CAM"), which was addressed as follows at page 4 of the Non-Unanimous Partial Stipulation And Agreement:

10. **CAM** The Signatories agree that the CAM attached as Exhibit B to this Stipulation should be approved by the Commission with the effective date of rates in this case. After approval, the Signatories agree that the Commission should close Docket No. EO-2014-0189.

3. On March 8, 2017, the Commission issued an Order Approving Stipulation And Agreement Regarding Certain Issues, including the CAM issue. No party objected to the Non-Unanimous Partial Stipulation And Agreement filed on February 10, 2017,

so the Commission treated it as a unanimous stipulation and agreement. The signatory parties were directed to comply with the terms of the stipulation and agreement. The Commission did not address the matter of closing File No. EO-2014-0189.

4. In the Commission's May 3, 2017, Report and Order in File No. ER-2016-0285, the Commission on pages 4 - 5 noted that on February 10, 2017, KCP&L, Staff, Public Counsel, and MCEG filed a Non-Unanimous Partial Stipulation and Agreement which became a unanimous stipulation and agreement resolving certain accounting and revenue issues and that on March 8, 2017, the Commission approved the stipulation and agreement. The Commission did not address the matter of closing File No. EO-2014-0189.

**WHEREFORE** Staff suggests to the Commission that it close File No. EO-2014-0189.

Respectfully submitted,

**/s/ Steven Dottheim**

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#### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing Staff Response To Commission Order Directing Filing has been transmitted electronically to all counsel of record this 14th day of December, 2018.

**/s/ Steven Dottheim**