

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

In the Matter of Kansas City Power & Light)
Company's Request for Authority to)
Implement a General Rate Increase for)
Electric Service)

Case No. ER-2014-0370

STAFF'S RESPONSE TO MECG'S OBJECTIONS

COMES NOW the Staff of the Missouri Public Service Commission and responds to the Midwest Energy Consumers Group's objections and request for hearing filed on September 15, 2015, as follows:

1. The Midwest Energy Consumers Group "objects to KCPL's compliance tariffs, objects to KCPL's request to expedite approval of the KCPL tariffs, objects to Staff's affidavits and requests an evidentiary hearing."

2. The Midwest Energy Consumers Group argues insufficient notice and lack of evidence, and with regard to evidence states: "Specifically, there is no evidence to support: (1) KCPL's calculation of the revenue requirement implied by the Report and Order; (2) KCPL's allocation of that revenue requirement to the various customer classes; or (3) KCPL's determination of rates to collect the individual class revenue requirements."

3. On September 3, 2015, Staff filed accounting schedules based on the Commission's September 2, 2015, Report and Order which reflect an annual customer rate revenue requirement of \$852,027,644, an increase of \$89,671,644 (11.76%), and Staff's calculation of Kansas City Power & Light Company's rate case expense for recovery in rates—\$713,907 over three years (\$237,969 per year). No one objected to Staff's filing.

4. Since it is the Commission that issued its Report and Order, no one is better positioned than the Commission to determine whether the tariff sheets Kansas City Power & Light Company filed comply with its order, and it needs no additional evidence to do so. The Midwest Energy Consumers Group's argument that more evidence is required is without merit.

5. Moreover, the Commission's decisions on the rate increase and fuel adjustment clause in its Report and Order, as amended, constitute the § 393.140(11), RSMo, good cause required for purposes of allowing tariff sheets that implement them to go into effect on less than thirty days' notice.

6. Although the Midwest Energy Consumers Group was afforded the opportunity to provide input into the development of the substitutions and replacements to the tariff sheets Kansas City Power & Light Company filed on September 8, 2015, in Tariff Tracking No. YE-2016-0077, even if it had not, because the Commission made both its order that approved the tariff sheets filed in Tariff Tracking No. YE-2016-0077 as substituted by tariff sheets in Tariff Tracking No. YE-2016-0078 and replaced by tariff sheets in Tariff Tracking No. YE-2016-0090 and the tariff sheets themselves effective on September 29, 2105, the Commission has afforded the Midwest Energy Consumers Group all the process the law requires—time to exercise the right § 386.500.1, RSMo, gives to apply for rehearing before the order takes effect.

WHEREFORE, the Staff of the Missouri Public Service Commission responds to Midwest Energy Consumers Group's objections and request for hearing as set forth above.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
Deputy Staff Counsel
Missouri Bar No. 35512

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8702 (Telephone)
(573) 751-9285 (Fax)
nathan.williams@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 23rd day of September, 2015.

/s/ Nathan Williams