

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

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for)
Approval to Make Certain Changes in its Charges) Case No. ER-2010-0356
For Electric Service)

MOTION FOR CLARIFICATION

COME NOW Ag Processing, Inc. a cooperative, and the Sedalia Industrial Energy Users' Association (collectively referred to herein as "Industrial Intervenors") by and through undersigned counsel, and for its Motion for Clarification of the Commission's May 4, 2011 Report and Order respectfully state as follows:

1. On May 4, 2011, the Commission issued its Report and Order in the above-captioned matter. At pages 91-100 of that Order, the Commission addressed the fair value for the Crossroads Energy Center located in Clarksdale, Mississippi. In that Order, the Commission held that the fair value of the Crossroads units was \$61.8 million as of July 14, 2008.¹

2. Later, the Commission held that "given the subsequent 32 months, the fair market value of Crossroads for purposes of establishing rate base in this case should also reflect 32 months of depreciation on that unit."² As such, the Commission was capturing depreciation through March of 2011. Recognizing that the Commission ordered a true-up of items through December of 2010, the Commission's order captured three months of depreciation beyond the ordered true-up date.

¹ *Report and Order*, at pages 96 and 99.

² *Id.* at page 100.

3. Undersigned counsel takes full responsibility for this need for clarification. In its Proposed Findings of Fact, counsel made its request for the additional depreciation realized after July of 2008. Counsel, however, failed to account for the true-up date and instead counted all the months through the date that the proposed findings were filed. As such, counsel included three months of depreciation that occurred after the true-up date. In order to properly match all revenues, expenses and rate base items as of the same date, counsel should have only sought 29 months of depreciation (July 2008 through December 2010).

WHEREFORE, Industrial Intervenors respectfully request that the Commission clarify the Decision section found at page 100 to state: “Given the subsequent 29 months through the ordered true-up date, the fair market value of Crossroads for purposes of establishing rate base in this case should also reflect 29 months of depreciation on that unit.

Respectfully submitted,



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ATTORNEYS FOR THE INDUSTRIAL
INTERVENORS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

A handwritten signature in black ink, appearing to read "David L. Woodsmall". The signature is written in a cursive style with a large initial "D" and "W".

David L. Woodsmall

Dated: May 13, 2011