

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

In the Matter of the Second Prudence Review )  
of Costs Subject to the Commission-Approved ) Case No. EO-2019-0068  
Fuel Adjustment Clause of Kansas City Power )  
and Light Company )

**STAFF'S RESPONSE TO ORDER DIRECTING NOTICE,  
ACKNOWLEDGING AUTOMATIC PARTIES, AND ESTABLISHING DEADLINES FOR  
INTERVENTION AND REQUESTING A HEARING**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its response to the Commission's *Order Directing Notice, Acknowledging Automatic Parties, And Establishing Deadlines For Intervention And Requesting A Hearing* ("Order"), states as follows:

1. On September 11, 2018, the Commission issued its Order directing that "*Staff counsel shall identify and file the names of all persons and entities described in 4 CSR 240.3.161(10)(A) who must be made parties to this case, no later than September 25, 2018.*"

2. In a recent similar case initiating the 7<sup>th</sup> prudence review of The Empire District Electric Company's fuel adjustment clause, File No. EO-2018-0244, the Commission stated in its *Order Directing Notice, Acknowledging Automatic Parties, Establishing Deadlines For Intervention And For Requesting A Hearing*:

"The Commission will give notice of the commencement of Staff's audit to potentially interested entities and will set a date for the filing of applications to intervene. Commission Rule 4 CSR 240-3.161(10) provides that parties to the rate case in which the Commission established the fuel adjustment clause are automatically parties to this prudence audit case. The Commission acknowledges the parties to ER-2014-0351 as parties to this case without the need to apply to intervene. The Data Center shall add these parties to the service list."

3. Staff counsel understands the meaning of 4 CSR 240-3.161(10) given by the Commission in File No. EO-2018-0244. Thus for Kansas City Power & Light Company (“KCPL”), the last general rate case proceeding was Case No. ER-2014-0370.

4. Attached is a copy of the certified service list for KCPL’s last general rate Case No. ER-2014-0370. The certified service list is taken from the Commission’s Electronic Data Information Filing System (“EFIS”).

**WHEREFORE**, Staff counsel prays the Commission accept this Response to its Order.

Respectfully submitted,

**/s/ Robert S. Berlin**

Robert S. Berlin  
Deputy Staff Counsel  
Missouri Bar No. 51709

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 526-7779 (Telephone)  
(573) 751-9285 (Fax)  
bob.berlin@psc.mo.gov (e-mail)

**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 12<sup>th</sup> day of September, 2018.

**/s/ Robert S. Berlin**

**Missouri Public Service Commission**Service List for Case No. **ER-2014-0370** Last Updated: **3/1/2017**

**Missouri Public Service Commission**  
Staff Counsel Department  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
staffcounsel@psc.mo.gov

**Office of the Public Counsel**  
Hampton Williams  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
opcservice@ded.mo.gov

**Brightergy, LLC**  
Andrew Zellers  
P.O. Box 412034  
Kansas City, MO 6  
andyzellers@bright

**City of Kansas City, Missouri**  
Mark W Comley  
601 Monroe Street., Suite 301  
Jefferson City, MO 65102-0537  
comleym@ncrpc.com

**Consumers Council of Missouri**  
John B Coffman  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
john@johncoffman.net

**Federal Executive**  
Robert E Sauls  
625 East 26th St  
Kansas City, MO 6

**Federal Executive Agencies**  
Sean Tshikororo  
1000 Independence Ave SW  
Washington, DC 20585

**IBEW Local Union 1464**  
Michael E Amash  
753 State Ave, Suite 475  
Kansas City, KS 66101  
mea@blake-uhlig.com

**IBEW Local Union**  
Michael E Amash  
753 State Ave, Suit  
Kansas City, KS 66  
mea@blake-uhlig.c

**IBEW Local Union 412**  
Michael E Amash  
753 State Ave, Suite 475  
Kansas City, KS 66101  
mea@blake-uhlig.com

**Kansas City Power & Light Company**  
James M Fischer  
101 Madison Street, Suite 400  
Jefferson City, MO 65101  
jfischerpc@aol.com

**Kansas City Power & Light Company**  
Lisa A Gilbreath  
254 Commercial St  
Portland, ME 6411  
lgilbreath@pierc

**Kansas City Power & Light Company**  
Robert Hack  
1200 Main, 19th Floor  
P.O. Box 418679  
Kansas City, MO 64141-9679  
rob.hack@kcpl.com

**Kansas City Power & Light Company**  
Roger W Steiner  
1200 Main Street, 16th Floor  
P.O. Box 418679  
Kansas City, MO 64105-9679  
roger.steiner@kcpl.com

**Kansas City Power & Light Company**  
Karl Zobrist  
4520 Main Street, S  
Kansas City, MO 6  
karl.zobrist@dentor

**Midwest Energy Consumers Group**  
David Woodsmall  
308 E. High Street, Suite 204  
Jefferson City, MO 65101  
david.woodsmall@woodsmalllaw.com

**Missouri Division of Energy**  
Brian T Bear  
301 W. High St., Room 680  
P.O. Box 1766  
Jefferson City, MO 65102  
bbear.deenergycases@ded.mo.gov

**Missouri Gas Energy**  
Rick E Zucker  
14412 White Pine F  
Chesterfield, MO 6  
zuckerlaw21@gma

**Missouri Industrial Energy Consumers (MIEC)**

Edward F Downey  
221 Bolivar Street, Suite 101  
Jefferson City, MO 65101  
efdowney@bclplaw.com

**Missouri Industrial Energy Consumers (MIEC)**

Diana M Vuylsteke  
211 N. Broadway, Suite 3600  
St. Louis, MO 63102  
dmvuylsteke@bclplaw.com

**Missouri Public Service Commission**

Nathan Williams  
200 Madison Street  
P.O. Box 360  
Jefferson City, MO  
nathan.williams@psc.mo.gov

**Sierra Club**

Sunil Bector  
2101 Webster Street, Suite 1300  
Oakland, CA 94612  
sunil.bector@sierraclub.org

**Sierra Club**

Thomas Cmar  
1101 Lake Street, Ste. 405B  
Oak Park, IL 60301  
tcmar@earthjustice.org

**Sierra Club**

Lisa K Perfetto  
48 Wall Street, 19th Floor  
New York, NY 10005  
lperfetto@earthjustice.org

**Sierra Club**

Henry B Robertson  
319 N. Fourth St., Suite 800  
St. Louis, MO 63102  
hrobertson@greatriverslaw.org

**Union Electric Company**

James B Lowery  
111 South Ninth St., Suite 200  
P.O. Box 918  
Columbia, MO 65205-0918  
lowery@smithlewis.com

**Union Electric Company**

Wendy Tatro  
1901 Chouteau Ave  
St. Louis, MO 63103  
AmerenMOService@scs.com

**United States Department of Energy**

Robert E Sauls  
625 East 26th St  
Kansas City, MO 64108

**United States Department of Energy**

Sean Tshikororo  
1000 Independence Ave SW  
Washington, DC 20585

