

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

In the Matter of a Proposed Experimental Regulatory)
Plan of Kansas City Power & Light Company) Case No. EO-2005-0329

**STAFF’S CLARIFICATION OF APPENDIX A FILED ON AUGUST 12, 2005
RESPECTING PROPOSED AMENDMENT OF KANSAS CITY POWER
& LIGHT COMPANY’S MISSOURI EXPERIMENTAL REGULATORY PLAN**

Comes now the Staff of the Missouri Public Service Commission (Staff) and files the instant clarification of Appendix A which was submitted by the Staff on August 12, 2005, on behalf of the Staff, the Office of the Public Counsel (Public Counsel), the Missouri Department of Natural Resources (MDNR) and Praxair, Inc. (Praxair). In support thereof, the Staff states as follows:

1. The explanation of Appendix A contained in the Staff’s filing on August 12, 2005 is not as clear as undersigned counsel for the Staff thought it was when the filing was made. Undersigned counsel for the Staff has been contacted for clarification of Appendix A and undersigned counsel for Staff as a consequence believes that all would be served by a clarification of Appendix A being filed. Therefore, the Staff is making the instant filing.

2. Appendix A filed on August 12, 2005 is based on Attachment 2 to the Staff’s Suggestions In Support Of Stipulation And Agreement filed on May 10, 2005. Attachment 2 filed on May 10, 2005 was an effort by the Staff to identify for the Commission and the parties, by the use of Microsoft Word software’s “Track Changes” features of contrasting color, underlining and strikeouts, the differences between the KCPL Experimental Regulatory Plan as proposed in Kansas compared to the KCPL Experimental Regulatory Plan as proposed in Missouri. Undersigned Staff counsel thought that such a document would anticipate a request

for a comparison and also would provide an indication of the universe of the provisions, then known as being different in Kansas, respecting which the non-KCPL Signatory Parties in Missouri might propose adoption by this Commission for the Missouri KCPL Experimental Regulatory Plan. On August 5, 2005, the Kansas Corporation Commission (KCC) adopted the KCPL Experimental Regulatory Plan as filed by various parties in Kansas, without variation.

Appendix A filed by the Staff on August 12, 2005 was an effort on the part of the Staff to show, by further use of a contrasting color, the language proposed by the Staff, Public Counsel, MDNR and Praxair for adoption by this Commission as comparable to the language adopted by the KCC, which the Staff, Public Counsel, MDNR and Praxair desire to be reflected in the KCPL Experimental Regulatory Plan in Missouri.

3. Kansas City Power & Light Company (KCPL) evidently recognized that a more simple presentation of the language being proposed by the Staff, Public Counsel, MDNR and Praxair would be helpful, and sought to accomplish such a presentation in its responsive filing on August 16, 2005. KCPL, at pages 2 through 6 of Kansas City Power & Light Company's Response To Staff's, Public Counsel's, Missouri Department Of Natural Resources' And Praxair's Proposed Amendment Of The KCPL Experimental Regulatory Plan, lists the amendments proposed on August 12, 2005 in the filing made by the Staff on the behalf of itself, Public Counsel, MDNR and Praxair.¹

The Staff would offer a correction that it had not identified for KCPL, and, as a consequence, is not reflected in KCPL's August 16, 2005 filing: the reference to "paragraph III.B.5" regarding item "m" at the bottom of page 5 and regarding item "n" at the top of page 6

¹ The Staff in its August 12, 2005 filing also commented, for the purpose of clarification, that the chart entitled "Proposed Capital Expenditure Level Increases (excluding demand response programs)" that appears in both the Missouri Stipulation And Agreement in Appendix D, page D-5, and in the Kansas Stipulation And Agreement in Appendix A, page A-1, shows total company dollars.

of KCPL's filing on August 16, 2005, instead should make reference to "paragraph III.B.3". Thus, the location for the placement of the amendment noted in item "m" should be at "page 29, new paragraph to be added after first full paragraph in **III.B.3**", and the location for the placement of the amendment noted in item "n" should be at "page 29, second new paragraph to be added after the first full paragraph in **III.B.3**".

Wherefore the Staff submits the clarification related in detail above of Appendix A which was filed by the Staff on August 12, 2005, on the behalf of itself, Public Counsel, MDNR and Praxair.

Respectfully submitted,

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/s/Steven Dottheim
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 18th day of August 2005.

/s/ Steven Dottheim