

4. As described in greater detail below, the Company believes *Staff's Response a)* ignores the fact that KCP&L has proposed the Clean Charge Network as a pilot and as a result erroneously assumes that a Commission decision in KCP&L's pending rate case regarding the Clean Charge Network pilot will establish policy on a going forward basis, and at the same time

b) adopts an unduly restrictive stance on activities the Commission may undertake during the pendency of general rate proceedings.

5. In paragraphs 3 – 6 of *Staff's Response*, an assortment of issues are discussed that Staff suggests could potentially arise in the rate case and, if so, would present real ex parte issues between the rate case and this working docket, according to Staff. Staff seems to assume that the Commission will be making permanent policy decisions regarding electric vehicle charging stations in the rate case. This assumption is incorrect and ignores the fact that KCP&L has proposed the Clean Charge Network as a pilot for the purpose of gathering real data on the opportunities presented by electric vehicles and electric vehicle charging stations. As a pilot, the program will enable evaluation of the effectiveness of the Clean Charge Network and its impact on the Company and customers. At the end of the pilot program, the Commission will be able to evaluate the program using data. Stakeholders will be able to participate in the working docket, with the opportunity to actively shape the data to be gathered and issues to be assessed and, ultimately, take positions on the basis of actual data. The Commission has a history of looking favorably on properly crafted pilot programs which demonstrate benefits to utilities and energy users.¹

6. In paragraph 7 of *Staff's Response*, Staff states that “[T]he steps KCPL and GMO have suggested . . . while substantive, do not resolve the potential problem of the Commission relying on information in this case when deciding the rate case, when that information is not in the rate case record.” The Company respectfully disagrees. By their nature, rate cases cover the full range of utilities’ costs and activities. At the same time, each rate case must be decided on the basis of a discrete record of competent and substantial evidence before the Commission in

¹ In the matter of Union Electric Company’s tariff filing to implement an experimental residential new construction pilot program, Case No. ET-95-209, November 1, 1995, p. 4.

that proceeding. The electric utility industry is currently in a cycle of increasing revenue requirements; three of the State's four investor-owned electric utilities have general rate cases currently before the Commission. GMO must file a rate case before the end of February 2016. When might an electric utility rate case *not* be pending before the Commission such that a working docket regarding electric vehicles and electric vehicle charging stations could proceed without ex parte concerns as suggested by Staff? Adopting the restrictive approach suggested by Staff would effectively impose on the Commission, contrary to Section 386.210 RSMo., a limitation on the free exchange of ideas, views, and information relating to matters of general regulatory policy. The Company does not believe such a restrictive approach is beneficial or necessary and urges the Commission to adopt a common sense approach that recognizes and protects the interests of all stakeholders in the regulatory process while permitting healthy exchange of information and ideas on topics of current general regulatory and public interest while rate cases are pending.

WHEREFORE, the Company respectfully requests that the Commission establish this matter as a working case.

Respectfully submitted,

/s/ Robert J. Hack

Robert J. Hack, MBN 36496

Phone: (816) 556-2791

E-mail: rob.hack@kcpl.com

Roger W. Steiner, MBN 39586

Phone: (816) 556-2314

E-mail: roger.steiner@kcpl.com

Kansas City Power & Light Company

1200 Main – 16th Floor

Kansas City, Missouri 64105

Fax: (816) 556-2787

Attorneys for Kansas City Power & Light Company
and KCP&L Greater Missouri Operations Company

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, this 3rd day of March, 2015, to all parties of record.

/s/ Robert J. Hack _____

Robert J. Hack