

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

In the Matter of the Application of Kansas)
City Power & Light Company for Authority to)
Extend the Transfer of Functional Control of) **File No. EO-2012-0135 et al.**
Certain Transmission Assets to the Southwest)
Power Pool, Inc.)

ORDER DIRECTING RESPONSE

Issue Date: October 11, 2019

Effective Date: October 11, 2019

Kansas City Power & Light Company (KCP&L) and KCP&L Greater Missouri Operations Company (GMO) (jointly, “the Company”) filed a motion on August 23, 2019, asking the Commission to modify some of the terms of the stipulation and agreement regarding KCP&L and GMO’s participation in the Southwest Power Pool (SPP), which the Commission approved in a June 19, 2013 order.

The motion explains that KCP&L, GMO, the Staff of the Commission, and Public Counsel have recently met to discuss the prudence of performing a cost/benefit analysis regarding KCP&L and GMO’s continued participation in the SPP. As a result of those discussions, the parties agreed, given the substantial cost of performing such a study and the large exit fee obligations that would be incurred by the Company if they were to exit the SPP, the cost/benefit study should not be performed at this time. KCP&L and GMO would still be required to file their next application regarding participation in the SPP no later than June 30, 2020, but that application would not include the 2020 interim report regarding the cost/benefit analysis.

However, the Commission continues to have questions about the cost/benefit study and the Interim Report, and would like more information from the parties before deciding

whether to approve the motion to modify. And while the Commission recognizes that the \$600,000 estimated cost of performing that study, not including internal labor, is certainly a substantial barrier to the performance of the study, the Commission would like the parties to evaluate ways in which the cost to perform the cost/benefit study required by the stipulation and agreement could be reduced, while still providing a study that would be useful. In particular, the Commission is concerned that this cost/benefit study may be necessary to allow the Commission to fully consider the June 2020 applications regarding continued participation in SPP.

In accordance with the previous order of the Commission in EO-2012-0135, and taking into account the high cost estimate(s) of doing a full study to measure the benefits of the Company remaining in SPP, the Company and the other parties should produce, using cost-efficient methods, methodologies of calculating an estimate of the benefits of the Company remaining in SPP versus the next best option. Parties may evaluate alternative methodologies, and cost estimates of such methodologies, of estimating the benefits and costs of the Company remaining in SPP, including the possibility of one of the alternatives being a load ration share approximation methodology and/or updating the inputs from the original benefit cost study of 2013 justifying the Company's participation in SPP. For example, could such a study be done internally at the Company at a lower cost? Could the study be done at a lower cost if it only evaluated the option of becoming a member of the Midcontinent Independent System Operator (MISO) instead of SPP, rather than evaluating the option of operating under an ICT? Should the study be postponed until a future date certain? Could a less extensive method be used to evaluate whether the benefits of remaining in SPP outweigh potential exit fees? Do any

other alternatives exist that would reduce the cost of performing the study, while still providing useful information for the Commission's consideration?

The Commission will direct the parties to discuss these questions and to jointly or separately file suggestions in response.

THE COMMISSION ORDERS THAT:

1. No later than October 24, 2019, the parties shall jointly or separately file suggestions in response to the questions identified above in the body of this order regarding the reduction of the cost to perform a cost/benefit study.

2. This order shall be effective when issued.

BY THE COMMISSION



A handwritten signature in black ink that reads "Morris L. Woodruff".

Morris L. Woodruff
Secretary

Morris L. Woodruff, Chief Regulatory
Law Judge, by delegation of authority
pursuant to Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 11th day of October, 2019.

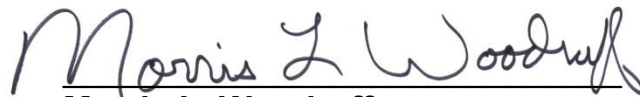
STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission,
at Jefferson City, Missouri, this 11th day of October 2019.




Morris L. Woodruff
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

October 11, 2019

File/Case No. EO-2012-0135

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
Marc Poston
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@opc.mo.gov

Dogwood Energy, LLC
Carl J Lumley
130 S. Bemiston, Ste. 200
St. Louis, MO 63105
clumley@lawfirmemail.com

Empire District Electric Company, The
Dean L Cooper
312 East Capitol
P.O. Box 456
Jefferson City, MO 65102
dcooper@brydonlaw.com

Evergy Missouri Metro
James M Fischer
101 Madison Street, Suite 400
Jefferson City, MO 65101
jfisherpc@aol.com

Evergy Missouri Metro
Robert Hack
1200 Main, 19th Floor
P.O. Box 418679
Kansas City, MO 64141-9679
rob.hack@evergy.com

Evergy Missouri Metro
Roger W Steiner
1200 Main Street, 16th Floor
P.O. Box 418679
Kansas City, MO 64105-9679
roger.steiner@evergy.com

Evergy Missouri West
James M Fischer
101 Madison Street, Suite 400
Jefferson City, MO 65101
jfisherpc@aol.com

Evergy Missouri West
Robert Hack
1200 Main, 19th Floor
P.O. Box 418679
Kansas City, MO 64141-9679
rob.hack@evergy.com

Evergy Missouri West
Roger W Steiner
1200 Main Street, 16th Floor
P.O. Box 418679
Kansas City, MO 64105-9679
roger.steiner@evergy.com

Missouri Public Service Commission
Nathan Williams
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
nathan.williams@psc.mo.gov

Southwest Power Pool, Inc.
Mark W Comley
601 Monroe Street., Suite 301
Jefferson City, MO 65102-0537
comleym@ncrpc.com

Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,

A handwritten signature in black ink that reads "Morris L. Woodruff". The signature is written in a cursive style with a large, prominent "M" and "W".

**Morris L. Woodruff
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.