

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

In the Matter of the Application of Kansas City        )  
Power & Light Company for Approval to Make        )  
Certain Changes in its Charges for Electric Service    )  
to Continue the Implementation of its Regulatory       )  
Plan.    )

**Case No. ER-2010-0355**  
Tariff Nos. YE-2011-0523  
and YE-2011-0524

**STAFF RECOMMENDATION TO APPROVE TARIFF SHEETS**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its recommendation states:

1. In its *Report and Order* issued April 12, 2011, on page 182 in ordered paragraph 3, the Commission directed “Kansas City Power & Light Company shall file tariffs that comport with this Report and Order no later than April 18, 2011. On April 19, 2011 the Commission clarified its *Report and Order* regarding fuel expense.

2. In ordered paragraph 4 appearing on page 182 of its *Report and Order* the Commission directed, “The Staff of the Commission shall file a recommendation regarding the tariffs ordered in paragraph 3 no later than April 22, 2011.”

3. On April 18, 2011, Kansas City Power & Light Company (“KCPL”) filed fifty-two (52) tariff sheets—fifty sheets of rate schedules and two sheets of rules and regulations—each bearing an issuance date of April 18, 2011 and effective date of May 18, 2011, that KCPL asserted comport with the *Report and Order*. Concurrently, KCPL filed a motion seeking an expedited decision by the Commission that the tariff sheets become effective on May 4, 2011 with less than thirty days’ notice for good cause shown; that good cause being they comport with the Commission’s *Report and Order*.

4. At Staff's request, on April 19, 2011, KCPL substituted one of the tariff sheets filed April 18, 2011, to correct a rate and on April 20, 2011, KCPL substituted two other of the tariff sheets to correct another rate and a typographical error.

5. On April 20, 2011, Staff responded to KPCL's assertion in its motion for expedited treatment that the Commission would violate Section 393.150.1, RSMo., if it did not make the tariff sheets effective by May 4, 2011, because the Commission has never suspended the tariff sheets KPCL filed June 4, 2010 bearing effective dates of May 4, 2011, and with ordered paragraph 2 on page 182 of its *Report and Order* explicitly rejected those tariff sheets as follows:

**2. *The proposed tariff sheets filed by Kansas City Power & Light Company on June 4, 2010, Tariff No. JE-2010-0692, are rejected.***

However, Staff did not oppose KCPL's request for an expedited decision on the motion or early effective date for the tariff sheets. Staff agrees that tariff sheets that comply with the Commission's *Report and Order*, as clarified, constitute sufficient "good cause" for purposes of section 393.140(11), RSMo., to allow the tariff sheets to become effective on less than thirty days' notice. Section 393.140(11), RSMo., provides: "The commission for good cause shown may allow changes without requiring the thirty days' notice under such conditions as it may prescribe."

6. In the attached Memorandum (Appendix A), as directed by the Commission in ordered paragraph 4 appearing on page 182 of its *Report and Order*, the Missouri Public Service Commission Energy Department Staff (Staff) recommends that the Commission issue an Order that, for good cause shown, approves the following proposed tariff sheets, as filed on April 18,

2011, and substituted on April 19, 2011 and April 20, 2011, to become effective on May 4, 2011,  
as KCPL requests:

P.S.C. MO. No. 7 (Rates)

Ninth	Revised Sheet No. TOC-1	Cancelling Eighth	Revised Sheet No. TOC-1
Sixth	Revised Sheet No. 5A	Cancelling Fifth	Revised Sheet No. 5A
Sixth	Revised Sheet No. 5B	Cancelling Fifth	Revised Sheet No. 5B
First	Revised Sheet No. 6	Cancelling	Original Sheet No. 6
Sixth	Revised Sheet No. 8	Cancelling Fifth	Revised Sheet No. 8
Fifth	Revised Sheet No. 8A	Cancelling Fourth	Revised Sheet No. 8A
Sixth	Revised Sheet No. 9A	Cancelling Fifth	Revised Sheet No. 9A
Sixth	Revised Sheet No. 9B	Cancelling Fifth	Revised Sheet No. 9B
Sixth	Revised Sheet No. 10A	Cancelling Fifth	Revised Sheet No. 10A
Sixth	Revised Sheet No. 10B	Cancelling Fifth	Revised Sheet No. 10B
Sixth	Revised Sheet No. 10C	Cancelling Fifth	Revised Sheet No. 10C
Sixth	Revised Sheet No. 11A	Cancelling Fifth	Revised Sheet No. 11A
Sixth	Revised Sheet No. 11B	Cancelling Fifth	Revised Sheet No. 11B
Sixth	Revised Sheet No. 11C	Cancelling Fifth	Revised Sheet No. 11C
Sixth	Revised Sheet No. 14A	Cancelling Fifth	Revised Sheet No. 14A
Sixth	Revised Sheet No. 14B	Cancelling Fifth	Revised Sheet No. 14B
Sixth	Revised Sheet No. 14C	Cancelling Fifth	Revised Sheet No. 14C
Sixth	Revised Sheet No. 17A	Cancelling Fifth	Revised Sheet No. 17A
Sixth	Revised Sheet No. 18A	Cancelling Fifth	Revised Sheet No. 18A
Sixth	Revised Sheet No. 18B	Cancelling Fifth	Revised Sheet No. 18B
Sixth	Revised Sheet No. 18C	Cancelling Fifth	Revised Sheet No. 18C
Sixth	Revised Sheet No. 19A	Cancelling Fifth	Revised Sheet No. 19A
Sixth	Revised Sheet No. 19B	Cancelling Fifth	Revised Sheet No. 19B
Sixth	Revised Sheet No. 19C	Cancelling Fifth	Revised Sheet No. 19C
Sixth	Revised Sheet No. 20C	Cancelling Fifth	Revised Sheet No. 20C
First	Revised Sheet No. 24	Cancelling	Original Sheet No. 24
Eleventh	Revised Sheet No. 24A	Cancelling Tenth	Revised Sheet No. 24A
First	Revised Sheet No. 24B	Cancelling	Original Sheet No. 24B
Fifth	Revised Sheet No. 28B	Cancelling Fourth	Revised Sheet No. 28B
Sixth	Revised Sheet No. 30	Cancelling Fifth	Revised Sheet No. 30
Sixth	Revised Sheet No. 33	Cancelling Fifth	Revised Sheet No. 33
Second	Revised Sheet No. 33A	Cancelling First	Revised Sheet No. 33A
Second	Revised Sheet No. 33B	Cancelling First	Revised Sheet No. 33B
Sixth	Revised Sheet No. 35	Cancelling Fifth	Revised Sheet No. 35
Sixth	Revised Sheet No. 35A	Cancelling Fifth	Revised Sheet No. 35A
Sixth	Revised Sheet No. 35B	Cancelling Fifth	Revised Sheet No. 35B
Sixth	Revised Sheet No. 35C	Cancelling Fifth	Revised Sheet No. 35C
Sixth	Revised Sheet No. 36	Cancelling Fifth	Revised Sheet No. 36
Sixth	Revised Sheet No. 36A	Cancelling Fifth	Revised Sheet No. 36A
Sixth	Revised Sheet No. 36B	Cancelling Fifth	Revised Sheet No. 36B
Sixth	Revised Sheet No. 37	Cancelling Fifth	Revised Sheet No. 37

Sixth	Revised Sheet No. 37A	Cancelling Fifth	Revised Sheet No. 37A
Sixth	Revised Sheet No. 37B	Cancelling Fifth	Revised Sheet No. 37B
Sixth	Revised Sheet No. 37C	Cancelling Fifth	Revised Sheet No. 37C
Sixth	Revised Sheet No. 37D	Cancelling Fifth	Revised Sheet No. 37D
Sixth	Revised Sheet No. 37E	Cancelling Fifth	Revised Sheet No. 37E
Sixth	Revised Sheet No. 37F	Cancelling Fifth	Revised Sheet No. 37F
Sixth	Revised Sheet No. 37G	Cancelling Fifth	Revised Sheet No. 37G
Sixth	Revised Sheet No. 45	Cancelling Fifth	Revised Sheet No. 45
Sixth	Revised Sheet No. 45A	Cancelling Fifth	Revised Sheet No. 45A

P.S.C. MO. No. 2 (Rules)

Second	Revised Sheet No. 1.17	Cancelling First	Revised Sheet No. 1.17
Third	Revised Sheet No. 1.28	Cancelling Second	Revised Sheet No. 1.28

7. The Staff has verified that KCPL is not delinquent in filing its 2010 annual report—it has a filing extension to May 15, 2011—and that KCPL is not delinquent on its assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

8. **WHEREFORE**, Staff requests the Commission issue an Order that finds (1) good cause shown for complying with the Commission’s Report and Order, as clarified, to make them effective on less than thirty days’ notice and (2) approves the following proposed tariff sheets, as filed on April 18, 2011, and substituted on April 19, 2011 and April 20, 2011, to become effective on May 4, 2011, as KCPL requests:

P.S.C. MO. No. 7 (Rates)

Ninth	Revised Sheet No. TOC-1	Cancelling Eighth	Revised Sheet No. TOC-1
Sixth	Revised Sheet No. 5A	Cancelling Fifth	Revised Sheet No. 5A
Sixth	Revised Sheet No. 5B	Cancelling Fifth	Revised Sheet No. 5B
First	Revised Sheet No. 6	Cancelling	Original Sheet No. 6
Sixth	Revised Sheet No. 8	Cancelling Fifth	Revised Sheet No. 8
Fifth	Revised Sheet No. 8A	Cancelling Fourth	Revised Sheet No. 8A
Sixth	Revised Sheet No. 9A	Cancelling Fifth	Revised Sheet No. 9A
Sixth	Revised Sheet No. 9B	Cancelling Fifth	Revised Sheet No. 9B
Sixth	Revised Sheet No. 10A	Cancelling Fifth	Revised Sheet No. 10A
Sixth	Revised Sheet No. 10B	Cancelling Fifth	Revised Sheet No. 10B
Sixth	Revised Sheet No. 10C	Cancelling Fifth	Revised Sheet No. 10C
Sixth	Revised Sheet No. 11A	Cancelling Fifth	Revised Sheet No. 11A
Sixth	Revised Sheet No. 11B	Cancelling Fifth	Revised Sheet No. 11B

Sixth	Revised Sheet No. 11C	Cancelling Fifth	Revised Sheet No. 11C
Sixth	Revised Sheet No. 14A	Cancelling Fifth	Revised Sheet No. 14A
Sixth	Revised Sheet No. 14B	Cancelling Fifth	Revised Sheet No. 14B
Sixth	Revised Sheet No. 14C	Cancelling Fifth	Revised Sheet No. 14C
Sixth	Revised Sheet No. 17A	Cancelling Fifth	Revised Sheet No. 17A
Sixth	Revised Sheet No. 18A	Cancelling Fifth	Revised Sheet No. 18A
Sixth	Revised Sheet No. 18B	Cancelling Fifth	Revised Sheet No. 18B
Sixth	Revised Sheet No. 18C	Cancelling Fifth	Revised Sheet No. 18C
Sixth	Revised Sheet No. 19A	Cancelling Fifth	Revised Sheet No. 19A
Sixth	Revised Sheet No. 19B	Cancelling Fifth	Revised Sheet No. 19B
Sixth	Revised Sheet No. 19C	Cancelling Fifth	Revised Sheet No. 19C
Sixth	Revised Sheet No. 20C	Cancelling Fifth	Revised Sheet No. 20C
First	Revised Sheet No. 24	Cancelling	Original Sheet No. 24
Eleventh	Revised Sheet No. 24A	Cancelling Tenth	Revised Sheet No. 24A
First	Revised Sheet No. 24B	Cancelling	Original Sheet No. 24B
Fifth	Revised Sheet No. 28B	Cancelling Fourth	Revised Sheet No. 28B
Sixth	Revised Sheet No. 30	Cancelling Fifth	Revised Sheet No. 30
Sixth	Revised Sheet No. 33	Cancelling Fifth	Revised Sheet No. 33
Second	Revised Sheet No. 33A	Cancelling First	Revised Sheet No. 33A
Second	Revised Sheet No. 33B	Cancelling First	Revised Sheet No. 33B
Sixth	Revised Sheet No. 35	Cancelling Fifth	Revised Sheet No. 35
Sixth	Revised Sheet No. 35A	Cancelling Fifth	Revised Sheet No. 35A
Sixth	Revised Sheet No. 35B	Cancelling Fifth	Revised Sheet No. 35B
Sixth	Revised Sheet No. 35C	Cancelling Fifth	Revised Sheet No. 35C
Sixth	Revised Sheet No. 36	Cancelling Fifth	Revised Sheet No. 36
Sixth	Revised Sheet No. 36A	Cancelling Fifth	Revised Sheet No. 36A
Sixth	Revised Sheet No. 36B	Cancelling Fifth	Revised Sheet No. 36B
Sixth	Revised Sheet No. 37	Cancelling Fifth	Revised Sheet No. 37
Sixth	Revised Sheet No. 37A	Cancelling Fifth	Revised Sheet No. 37A
Sixth	Revised Sheet No. 37B	Cancelling Fifth	Revised Sheet No. 37B
Sixth	Revised Sheet No. 37C	Cancelling Fifth	Revised Sheet No. 37C
Sixth	Revised Sheet No. 37D	Cancelling Fifth	Revised Sheet No. 37D
Sixth	Revised Sheet No. 37E	Cancelling Fifth	Revised Sheet No. 37E
Sixth	Revised Sheet No. 37F	Cancelling Fifth	Revised Sheet No. 37F
Sixth	Revised Sheet No. 37G	Cancelling Fifth	Revised Sheet No. 37G
Sixth	Revised Sheet No. 45	Cancelling Fifth	Revised Sheet No. 45
Sixth	Revised Sheet No. 45A	Cancelling Fifth	Revised Sheet No. 45A

P.S.C. MO. No. 2 (Rules)

Second	Revised Sheet No. 1.17	Cancelling First	Revised Sheet No. 1.17
Third	Revised Sheet No. 1.28	Cancelling Second	Revised Sheet No. 1.28

Respectfully submitted,

**/s/ Nathan Williams**

Nathan Williams  
Deputy Staff Counsel  
Missouri Bar No. 35512

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Missouri Public Service Commission  
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**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 22<sup>nd</sup> day of April 2011.

**/s/ Nathan Williams**

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
Case No. ER-2010-0355 Tariff Filing Nos. YE-2011-0523 & YE-2011-0524  
Kansas City Power & Light Company

FROM: Mike Scheperle, Manager, Economic Analysis  
Mack McDuffey, Rate & Tariff Examiner II

/s/ Curt Wells 4/22/11  
Co-Case Coordinator / Date

/s/ Nathan Williams 4/22/11  
Staff Counsel Division / Date

SUBJECT: Staff Recommendation For **Approval** Of Tariff Sheets Filed To Comply With  
The Commission's April 12, 2011 Report And Order Approving Non-Unanimous  
Stipulations and Agreements and Authorizing Tariff Filing.

DATE: April 22, 2011

On April 18, 2011, Kansas City Power & Light Company (KCPL) filed with the Commission fifty (50) rates tariff sheets, P.S.C. MO. No. 7 (YE-2011-0523) and two (2) rules and regulations tariff sheets, P.S.C. MO. No. 2 (YE-2011-0524) with an issue date of April 18, 2011, and a proposed effective date of May 18, 2011. KCPL also filed Motion For Expedited Consideration And Approval Of Tariff Sheets Filed In Compliance With Commission Order On Less Than Thirty Days' Notice (Motion) seeking for the tariff sheets to become effective May 4, 2011. On April 19, 2011, KCPL filed a substitute tariff sheet to correct a rate as requested by the Commission's Energy Department Staff (Staff). On April 20, 2011, KCPL filed two (2) substitute tariff sheets to correct a rate and correct a typographical error as requested by the Staff.

These tariff sheets are designed to comply with Ordered Paragraphs 3 and 4 of the Commission's April 12, 2011 Report And Order Approving Non-Unanimous Stipulations and Agreements and Authorizing Tariff Filing (Order). Ordered Paragraphs 1, 3 and 4 of the Order state:

1. The seven Nonunanimous Stipulations and Agreements referenced in this Report and Order are approved, and the signatories thereto are ordered to comply with those Nonunanimous Stipulations and Agreements.

\* \* \* \*

3. Kansas City Power & Light Company shall file tariffs that comport with this Report and Order no later than April 18, 2011.

4. The Staff of the Commission shall file a recommendation regarding the tariffs ordered in paragraph 3 no later than April 22, 2011. Any party that wishes to object to the tariffs ordered in paragraph 3 shall do so no later than April 22, 2011.

### Revenue Requirement and Rate Design

The revenue requirement increase for KCPL is \$34,817,199 or 5.25%. Rate Design tariff sheets filed by KCPL comply with approved: 1) Non-Unanimous Stipulation and Agreement As to Class Cost of Service / Rate Design, 2) Non-Unanimous Stipulation and Agreement As to MGE

Rate Design Issue and 3) Non-Unanimous Stipulation and Agreement As to Outdoor Lighting Issues.

Low-Income Weatherization

The Commission determines that KCPL shall continue their low-income weatherization program at its present level of funding; continue working with local community action agencies; and evaluate transition of the funds to the Environmental Improvement and Energy Resources Authority (EI ERA) and administration of the program to the Department of Natural Resources (DNR) and present that evaluation to the Collaborative Planning Advisory Group (CPAG) for consideration.

Staff Recommendation

The Staff has reviewed the filed tariff sheets, and is of the opinion that they are in compliance with the Commission's Order. Staff therefore recommends that the Commission issue an order approving the following proposed tariff sheets, as filed on April 18, 2011, and substituted on April 19, 2011 and April 20, 2011, to become effective on May 4, 2011 as requested in KCPL's Motion with less than 30 day's notice for good cause shown pursuant to Section 393.140(11) RSMo 2000 and agreed to by the signatory parties in the Non-Unanimous Stipulations and Agreements:

P.S.C. MO. No. 7 (Rates)

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Sixth	Revised Sheet No. 14A	Cancelling Fifth	Revised Sheet No. 14A
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Sixth	Revised Sheet No. 14C	Cancelling Fifth	Revised Sheet No. 14C
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Sixth	Revised Sheet No. 20C	Cancelling Fifth	Revised Sheet No. 20C
First	Revised Sheet No. 24	Cancelling	Original Sheet No. 24



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Sixth	Revised Sheet No. 35B	Cancelling Fifth	Revised Sheet No. 35B
Sixth	Revised Sheet No. 35C	Cancelling Fifth	Revised Sheet No. 35C
Sixth	Revised Sheet No. 36	Cancelling Fifth	Revised Sheet No. 36
Sixth	Revised Sheet No. 36A	Cancelling Fifth	Revised Sheet No. 36A
Sixth	Revised Sheet No. 36B	Cancelling Fifth	Revised Sheet No. 36B
Sixth	Revised Sheet No. 37	Cancelling Fifth	Revised Sheet No. 37
Sixth	Revised Sheet No. 37A	Cancelling Fifth	Revised Sheet No. 37A
Sixth	Revised Sheet No. 37B	Cancelling Fifth	Revised Sheet No. 37B
Sixth	Revised Sheet No. 37C	Cancelling Fifth	Revised Sheet No. 37C
Sixth	Revised Sheet No. 37D	Cancelling Fifth	Revised Sheet No. 37D
Sixth	Revised Sheet No. 37E	Cancelling Fifth	Revised Sheet No. 37E
Sixth	Revised Sheet No. 37F	Cancelling Fifth	Revised Sheet No. 37F
Sixth	Revised Sheet No. 37G	Cancelling Fifth	Revised Sheet No. 37G
Sixth	Revised Sheet No. 45	Cancelling Fifth	Revised Sheet No. 45
Sixth	Revised Sheet No. 45A	Cancelling Fifth	Revised Sheet No. 45A

P.S.C. MO. No. 2 (Rules)

Second	Revised Sheet No. 1.17	Cancelling First	Revised Sheet No. 1.17
Third	Revised Sheet No. 1.28	Cancelling Second	Revised Sheet No. 1.28

The Staff has verified that KCPL has not filed its 2010 annual report but has a filing extension to May 15th and is not delinquent on its assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.