

attendant to electric vehicles and electric vehicle charging stations would be explored on a collaborative basis in the working docket.

4. For example, many issues related to electric vehicles and electric vehicle charging stations are not implicated in KCP&L's rate case and do not constitute ex parte communications under the "general regulatory policy" exception in the Commission's rules and Section 386.210(4) RSMo. By establishing a working docket, the Commission can receive information from, and provide guidance to, all interested stakeholders on important general regulatory policy issues such as:

- Should non-utilities be able to charge for the use of electric vehicle charging stations and, if so, would such charges be subject to regulation by the Commission?
- Can electric vehicles and electric vehicle charging stations enhance efficiency and utilization of the grid and, if so, how should such impacts be assessed, optimized and recognized?
- Do electric vehicles and electric vehicle charging stations present demand response opportunities and, if so, how should such opportunities be assessed, optimized and implemented?
- Does the regulatory process need more flexibility to permit real-time exploration of costs and benefits associated with evolving markets such as that associated with electric vehicles and, if so, what approaches to increase regulatory flexibility should be pursued or adopted?

5. KCP&L believes that the Rate Case issues regarding the revenue requirement impact of the Clean Charge Network pilot can be effectively "roped off" from the broader general regulatory and public policy issues related to electric vehicles and electric vehicle

charging stations. The Company believes that this approach is consistent with the provisions of the Ex Parte Rule, 4 CSR 240-4.020 because discussions of “general regulatory policy” under Subsection (1)(J) would be addressed in the working docket and not be considered ex parte communications under Subsection (1)(G).

6. Other steps could be taken to insure that all parties to the Rate Case are made aware of the proceedings in the working case, such as:

- Post notice twenty four hours in advance of all sessions of the working docket and ensure that the sessions are transcribed. Transcripts and other written communications made in the course of the working docket should be served on all parties to the Rate Case. This would allow the exploration of broader electric vehicle and charging station policy issues in a collaborative working docket by all stakeholders in the regulatory process while enabling all parties to the Rate Case to be served with all information from the working docket that is available to the Commissioners, technical advisory staff and the presiding officer. This would be a reasonable approach if the Commission believes other steps should be taken.

7. The Company strongly believes that the Commission (including technical advisory staff and presiding officers) can and will fairly and lawfully undertake its responsibilities in ongoing rate cases while at the same time participating in and learning from working dockets opened to explore general regulatory policy issues that may have some relationship to revenue requirement issues to be determined in those rate cases. The Company also strongly believes that whether this or any other working docket is opened, it is not reasonable to expect that the Commission will be shielded from exposure to information on general regulatory and public policy issues that may relate to issues to be determined in rate cases. In this regard, the Company 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 19th day of February, 2015, to all parties of record.

/s/ Robert J. Hack

Robert J. Hack