

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE 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) **Case No. ER-2012-0174**
Electric Service to Implement its Regulatory) **Tariff No YE-2012-0404**
Plan.)

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for) **Case No. ER-2012-0175**
Approval to Make Certain Changes in its) **Tariff No. YE-2012-0405**
Charges for Electric Service.)

**NON-UNANIMOUS STIPULATION AND
AGREEMENT AS TO CERTAIN ISSUES**

COME NOW the Staff of the Missouri Public Service Commission (“Staff”), Kansas City Power & Light Company (“KCPL”) and KCP&L Greater Missouri Operations Company (“GMO”), collectively “Signatories,” and, in consideration of both (1) making the adjustments shown in the table below to Staff’s models to reflect increases to the revenue requirements for KCPL and the MPS and L&P rate districts of GMO in the true-up of the above-referenced cases, and (2) the other agreements that follow, the Signatories have resolved the issues listed below as described in the list of issues Staff filed on October 11, 2012, and other matters addressed in this Stipulation, as follows:

Revenue Requirement Increase

KCPL: \$6.14 million

MPS (GMO): \$6.39 million

L&P (GMO): \$1.58 million

As recited in the General Provisions below, except as explicitly provided herein, none of the Signatories shall be prejudiced or bound in any manner by the terms of this Stipulation in this

or any other proceeding, regardless of whether the Commission approves this Stipulation. Where an issue listed in the list of issues Staff filed October 11, 2012, has a resolution that is specific to it, that resolution is stated following the statement of the issue. Any agreements in a resolution to a stated issue that are to have a binding effect in other proceedings are explicitly stated to do so following the statement of that issue.

KCPL Only Issues

Issue I.3. **Hawthorn Selective Catalytic Reduction System (SCR)**: (KCPL: Hensley & Crawford; Staff: Lyons & Featherstone) (KCPL descriptions of these issues are in the appendix.)

- a. Should KCPL's rate base and expense be adjusted to reflect underperformance of the Hawthorn SCR as Staff proposes?
- b. Should KCPL's ongoing fuel expense be adjusted to reflect Staff's outage adjustment based on underperformance of the Hawthorn SCR?

Resolution: The value Staff will include in its August 31, 2012, true-up revenue model run for KCPL is a rate base reduction of \$788,803 for Hawthorn SCR catalyst, which will reduce Staff's revenue requirement for KCPL by \$63,267.

Issue I.4. **Income Tax**: (KCPL: Hardesty; Staff: Hyneman) Should the amount included in revenue requirement for Iatan 2 Advanced Coal Tax Credit be based on the amount utilized for federal income tax purposes on a separate income tax return basis or on a consolidated tax return basis?

Issue I.5. **Kansas City Missouri Earnings Tax**: (KCPL: Hardesty; Staff: Hyneman)

- a. What amount should be included in KCPL's revenue requirement for earnings tax?
 - i. If an amount for earnings tax is included in KCPL's revenue requirement should that amount be determined after allocation of a portion of KCPL's Kansas City earnings tax to GMO and to KCPL's Kansas jurisdiction?
 - ii. Should KCMO earnings tax be included in revenue requirement as an income tax applied to adjusted Missouri jurisdictional taxable income consistent with taxable income calculated for ratemaking?

- b. Should the effective income tax rate used to gross up the authorized revenue requirement include a component for the KCMO earnings tax as well as federal and state income taxes?

Resolution: No specific adjustment shall be made to Staff’s revenue requirement for KCPL based on Kansas City, Missouri, earnings tax; henceforth KCPL *shall* treat the Kansas City, Missouri, earnings tax as a general corporate tax subject to typical normalization adjustments applied to other utility expenses for KCPL’s revenue requirement in Missouri, and *not* as a component of income tax expense.

Issue I.7. **Fuel and Purchased Power Expense:** (KCPL: Crawford; Staff: Harris & Lange; KCPL Industrials: Phillips)

- c. Should margins from non-asset based wholesale transaction, also referred to as “Q” sales, be excluded from KCPL’s cost service?
- e. What is the proper treatment of equivalent forced outage rate at Hawthorn Unit 5? (Hawthorn 5 transformer)

Issue I.11. **Arbitration Expenses and Settlement:** (KCPL: Weisensee, Staff: Majors)

- a. Should the expenses KCPL incurred in arbitrating with Empire over access to Schiff-Hardin legal invoices be included in revenue requirement?
- b. Should the settlement of the arbitration with Empire over access to Schiff-Hardin legal invoices charged to plant-in-service be included in rate base?

KCPL – GMO Common Issues

Issue II.2. **Economic Relief Pilot Program (“ERPP”):** (KCPL/GMO: Heidtbrink: Staff: Poole-King & Lyons)

- a. Should the Economic Relief Pilot Program be expanded as a permanent ratepayer funded program or should it remain a pilot program, maintaining current program terms including participation levels, and program funding remain 50% ratepayer/50% company?
- b. Should a separate advisory group who is familiar with low-income customers, issues and rate programs be developed for all future collaborative discussions regarding the ERPP?
- c. Should KCPL and GMO be ordered to provide an ERPP report to the advisory group described above on a monthly basis?

Resolution: KCPL and GMO shall continue to fund the ERPP at \$315,000 each, with total program funding remaining 50% ratepayers and 50% company. The ERPP shall continue as a pilot program with existing program terms and participation levels. Meetings relating to the ERPP shall be conducted as breakout sessions of the DSM Advisory Groups, and KCPL and GMO will make reasonable effort to ensure proper Staff are notified of the scheduling of such breakout sessions.

The recommendations of the Salvation Army for improvements to the program shall be considered in the first meeting after this Stipulation is approved by the Commission.

Issue II.4. **Payroll:** (KCPL/GMO: Weisensee; Staff: Majors; KCPL Industrials GMO Industrials: Meyer).

a. What amount should be included in cost of service for overtime?

Issue II.5. **Pensions, OPEBs, SERP Costs:** (KCPL/GMO: Foltz; Staff: Hyneman) (KCPL/GMO descriptions of these issues are in the appendix.)

a. What amount should be included in cost of service for pension, OPEB and SERP costs?

b. Should the Company's salary assumption of 4.0% for management and 4.25% for bargaining unit employees based on Company-specific historical data be used to determine pension cost or should Staff's salary assumption of 3.5% based on a current Missouri utility average be used?

c. Should, in addition to annuity payments, Supplemental Executive Retirement Plan ("SERP") pension costs paid by KCPL as a lump-sum be included in revenue requirement based on a multi-year average of actual amounts paid or should SERP costs be based only on annual annuity payments to former KCPL executives?

d. Should SERP pension costs paid by the Wolf Creek Nuclear Operating Company ("WCNOC") for the Wolf Creek Generating Station as monthly annuities be included in revenue requirement based on actual amounts paid or should these amounts be subject to the Staff's reasonableness tests?

e. Should GMO SERP costs be included in revenue requirement at the amount proposed in the Company's rebuttal testimony without recognition of a \$50,000 reasonableness test as proposed by Staff?

f. Should SERP costs attributable to past non-regulated GMO (Aquila) operations be included in deriving the allocation factor used to assign SERP costs to GMO?

g. Should WCNOC OPEB expense be based on the actual dollar amount of OPEB expense paid by KCPL to WCNOC or a FAS 106 accrual amount?

h. If it is appropriate to include FAS106, including WCNOC, in revenue requirement, then should KCPL be required to contribute amounts collected in rates for WCNOC employees to a segregated WCNOC OPEB fund or should amounts in excess of amounts paid by KCPL to WCNOC be deposited in a KCP&L OPEB fund?

Resolution: The Signatories will continue to abide by the terms of the *Non-unanimous Stipulation and Agreement regarding Pensions and Other Post-Employment Benefits* filed in Case No. ER-2010-0355 on March 22, 2011, the Commission

approved in its April 12, 2011, *Report and Order* in Case No. ER-2010-0355, and the *Non-unanimous Stipulation and Agreement regarding Pensions and Other Post-Employment Benefits* and *Second Non-unanimous Stipulation and Agreement regarding Pensions and Other Post-Employment Benefits* filed in Case No. ER-2010-0356 on March 23, and May 13, 2011, respectively, the Commission approved in its May 4, 2011, *Report and Order* and its May 27, 2011, *Order of Clarification and Modification*, including the pension and OPEB trackers established pursuant to them. The Signatories will review them again in KCPL’s and GMO’s next general rate cases. The levels of FAS 87 pension expense and FAS 106 OPEB expense to be reflected in the trackers on a going forward basis when rates take effect in these cases are shown on Attachment No. 1

Issue II.7. **Acquisition Transition Costs:** (KCPL/GMO: Ives; Staff: Majors)

- a. Should recovery of the amortized acquisition transition costs end?
 - i. If not, what amount should be included in revenue requirement for the acquisition transition cost amortization?

Resolution: The five-year amortization of acquisition transition costs (KCPL annual amount of \$3.8 million, GMO amount of \$4.3 million—MPS \$3.5 million and L&P \$0.8 million) shall continue; however, KCPL and GMO shall not seek recovery of acquisition transition costs in any general electric rate case filed after January 1, 2015. Total Missouri jurisdictional transition costs related to the 2008 acquisition of Aquila are capped at the December 31, 2010 amount of \$41.5 million. No other transition costs related to the 2008 acquisition of Aquila will be deferred for recovery in any general electric rate case.

	KCPL-MO	MPS	L&P
Total	\$19,344,018	\$17,727,367	\$4,452,471
Remaining to be recovered at True-up	\$14,185,613	\$13,531,890	\$3,398,720
Already Recovered at True-Up	\$5,158,405	\$4,195,477	\$1,053,751
Annual Amount	\$3,868,804	\$3,545,473	\$890,494

Issue II.8. **Depreciation:** (KCPL/GMO: Spanos, Weisensee & Ives; Staff: Rice)

- a. Have KCPL and GMO complied with the provisions of the 2010 Depreciation Stipulation entered into in the last rate cases?
- b. Should KCPL and GMO continue to utilize the General Plant Amortization method?
- c. Should KCPL and GMO conduct an inventory of property in the General Plant Accounts?
- d. Should Staff's depreciation adjustments be adopted?

Resolution: Staff agrees not to pursue a complaint concerning compliance with the provisions of the *Non-Unanimous Stipulation and Agreement Regarding Depreciation and Accumulated Additional Amortizations* in Case Nos. ER-2010-0355 and ER-2010-0356 regarding a study of the causes of certain reserve balances, as set out in Staff recommendation number six at page 179 of the KCPL Staff Cost of Service Report and in Staff recommendation number six at page 190 of the GMO Staff Cost of Service Report.

KCPL and GMO will continue to utilize General Plant amortization method as set out in Case Nos. ER-2010-0355 and ER-2010-0356. KCPL and GMO will record vintage retirements. KCPL and GMO will make the plant account transfers included as Attachment Nos. 2 and 3. Staff, KCPL and GMO will reflect these adjustments and general plant amortization rates in the revenue requirement models for purposes of true-up in this case.

KCPL and GMO are not required to conduct an inventory of property in the General Plant Accounts at this time.

An adjustment of \$4,221,178 for stopped depreciation under Aquila will be recorded to increase accumulated depreciation reserves in GMO ECORP account 391.04 (Computer Software), as described in Attachment No. 3.

Issue II.9. **Bad Debt Expense/Forfeited Discount Revenue:** (KCPL/GMO: Weisensee; Staff: Lyons; KCPL Industrials & GMO Industrials: Meyer)

- a. Should bad debt expense and forfeited discount revenue included in rates in this case include a provision for the respective impacts resulting from the revenue increase in this case?
- b. How should normalized bad debt expense be determined?

Issue II.14 **Low Income Weatherization:** (KCPL/GMO: Rush; Staff: Warren; Kansas City: Bossert; MDNR: Bickford)

- a. At what level should low-income weatherization be funded and included in revenue requirement?
- b. Are the Companies distributing to agencies the weatherization funds collected from their ratepayers?
 - i. If not, why not?
- c. Should any weatherization funds which are collected during a year (plus any interest or return earned thereon) which are not distributed be available for distribution in subsequent years?
- d. Should the Companies consult the DSM Advisory Group (“DSMAG”) on the allocation and distribution of funds?
- e. Should the Companies provide quarterly reports to the DSMAG on the allocation and distribution of funds?
- f. Should the Companies file revised tariff sheets regarding their low-income weatherization program?

Resolution: In regard to GMO, if the Commission approves a MEEIA low-income weatherization program for GMO, then that MEEIA program should be funded and included in revenue requirement to the extent the Commission determines under MEEIA it is appropriate to do so. Otherwise, GMO’s low-income weatherization program should be funded (included in cost of service) at \$150,000 annually. (Both programs are not funded at the same time and they are mutually exclusive.)

In regard to KCPL, KCPL’s low-income weatherization program should be funded (included in cost of service) at \$573,888 annually; however, this low-income weatherization program should not be funded in rates at the same time KCPL’s retail customers are funding a low-income weatherization program the Commission approves under the MEEIA, if any. (Both programs are not funded at the same time and they are mutually exclusive.)

Any low-income weatherization funds which KCPL collects through its rates during a year which are not distributed to the low-income weatherization agencies during that year will be available for distribution in subsequent years. This will also apply to GMO’s low-income weatherization funds if the Commission does not approve a MEEIA low-income weatherization program for GMO.

KCPL and GMO will consult the DSM Advisory Group (DSMAG) regarding the allocation and distribution of the low-income weatherization funds. KCPL and GMO will also provide quarterly reports to the DSMAG on the allocation and distribution of these funds.

KCPL and GMO will file revised tariff sheets regarding their low-income weatherization program as reflected herein as part of their compliance tariffs in these rate cases, which must include provisions that incorporate the obligations of the preceding paragraphs.

Issue II.15. **Joint Resource Planning**: (KCPL/GMO: Rush; Staff: Mantle; MDNR: Bickford)

- a. Should KCPL and GMO be allowed to conduct joint resource planning?
 - i. If yes, should the Commission require KCPL and GMO to file with the Commission for approval a detailed proposal for allocating capacity and energy between them?
 - ii. If yes, should the Commission require KCPL and GMO to file a definitive plan for merging KCPL and GMO into one electrical corporation?

Resolution: KCPL and GMO will withdraw their requests for Commission acknowledgement of their joint resource planning in these cases and will address engaging in joint resource planning in their IRP filings currently before the Commission in Case Nos. EO-2012-0323 and EO-2012-0324.

Issue II.17. **Advanced Coal Tax Credit**: (KCPL/GMO: Hardesty & Montalbano; Staff: Featherstone)

- a. Should KCPL's advanced coal investment federal income tax credit for Iatan 2 be reduced to reflect a redistribution of a portion of that credit to GMO based on GMO's ownership interest in Iatan 2 and, concurrently, should GMO be treated as getting the benefit of that credit redistribution?
 - i. Should the Commission order KCPL, GMO, and Great Plains Energy jointly to seek IRS agreement to reallocate a portion of the credit to GMO based on GMO's ownership interest in Iatan 2?
 - 1) If the IRS does not agree to reallocate these Iatan 2 coal credits to GMO based on its ownership share of Iatan 2, then should the Commission order KCPL to pay the monetary equivalent to GMO of the value of the coal credits that should be allocated to GMO, or alternatively, should the Commission impute the value of the coal credits to GMO based on its ownership share of Iatan 2?
 - ii. In the alternative, should the Commission disallow certain Great Plains Energy and KCPL officers' salaries and benefits allocated to GMO?
 - iii. Or, in the alternative, should the Commission consider the Coal Credit issue when it determines the proper rate of return to use in the KCPL and GMO rate cases?

Resolution: KCPL will use the allocated share (\$80,725,000) of the Advanced Coal Tax Credit for ratemaking purposes in Missouri. The Signatories will not raise these issues again in any future Missouri Commission proceedings.

Issue II.18. **Inventory Management:** (KCPL/GMO: Wolf) Should Great Plains Energy Services be permitted to purchase KCPL's and GMO's current material and supply inventories and then become their source of materials and supplies?

Resolution: The Commission, pursuant to § 393.190, RSMo., should authorize KCPL and GMO to sell certain current common material and supply inventories to Great Plains Energy Services and the Commission should grant KCPL, GMO and Great Plains Energy Services variances from the Commission's affiliate transactions rule 4 CSR 240-20.015 as permitted by subsection (10) of that rule sufficient to allow them to effectuate a plan to consolidate certain common material and supply inventories of KCPL and GMO by having Great Plains Energy Services acquire and hold in inventory for KCPL and GMO such materials and supplies needed for their Commission-regulated utility operations. The transactions between KCPL, GMO and Great Plains Energy Services to transfer inventory to effectuate this plan shall be at cost.

Issue II.21. **Revenues:** (KCPL/GMO: Rush; Staff: Lyons, Won (KCPL case), Wells (GMO case), Schepeler)

- a. Should company revenues be tied to the company General Ledger?
- b. Should the difference in the General Ledger and the recalculation of revenues (i.e., tie amount used to verify the recalculation process) be carried forward and included in the normalized and annualized test year revenues?

GMO Only Issues

Issue III.2. **Capacity allocation (MPS vs. L&P):** (GMO: Crawford; Staff: Mantle) For determining revenue requirement, including fuel costs, how should GMO's Ralph Green generating facility and short-term purchased power agreements be assigned between MPS and L&P?

Resolution: GMO's Ralph Green generating facility shall be assigned to its L&P rate district for purposes of revenue requirement in this case and henceforth in rate cases, including fuel adjustment clause cases. If GMO reinstates its KCI generating facility on its regulated books and records, for purposes of revenue requirement in future cases, KCI shall be reinstated on the regulated books and records at net book value plus any reasonable and prudent capital expenditures required to return the KCI generating facility to operation.

Issue III.5. **L&P Ice Storm AAO**: (GMO: Weisensee; Staff: Lyons; OPC: Robertson)

- a. Should the amortization level of the L&P Ice Storm be reduced?
- b. Should recovery of that amortization be tracked, and any over-recovery addressed in GMO's next rate case?

Resolution: GMO's recovery of its five-year amortization for the L&P Ice Storm in December 2007 shall end on October 1, 2013, and to the extent GMO's L&P rate district rates from this case continue beyond that date, GMO shall "track" as a single issue the over-recovery of that amortization and adjust its revenue requirement for L&P in the following general electric rate case to return that "over-recovery" to its retail customers in its L&P rate district.

The total ice storm cost remaining to be recovered is \$1,721,890. The total amount of ice storm cost is \$7,947,180 and the annual amount reflected in true-up in this case is \$1,589,436.

Issue III.6. **Sibley AAO**: (GMO: Weisensee Staff: Lyons; OPC: Robertson)

- a. Should the Sibley AAO be discontinued?
- b. Should the Sibley AAO be rebased?
- c. Should the recovery of the Sibley AAO be tracked and any over-recovery addressed in GMO's next rate case?

Resolution: Staff and GMO will exclude \$121,095 from their August 31, 2012 true-up model runs for GMO, and GMO will not seek any further recovery based on the two Sibley AAOs now or in the future.

Issue III.7. **Rate Design/Class Cost of Service Study**: (GMO: Rush, Normand; Staff: Scheperle; GMO Industrials: Brubaker; OPC: Meisenheimer; DOE: Goins; MGE: Cummings)

- a. Should GMO be required to conduct a comprehensive study on the impacts of its retail customers of eliminating the MPS and L&P rate districts and implementing company-wide uniform rate classes?
- b. Should GMO be required to conduct a class cost of service study to determine the differences in its cost of service for each of the classes of MPS and L&P customers?

Resolution: GMO will perform, prepare and file in its general electric rate case the results of a comprehensive study on the impacts on its retail customers of eliminating the MPS and L&P rate districts and implementing company-wide uniform rate classes, and rates and rate elements for each rate class, taking into account the

potential future consolidation of GMO rates with those of KCPL. In this study, GMO will provide a distribution of rate impact on each of its customers of moving from MPS to L&P rate structures, and rate elements, and likewise, from L&P to MPS rate structures, and rate elements. If GMO would prefer a class rate structure that is different from a current MPS or L&P class rate structure, then individual customer impacts should be provided for the rate structure that GMO proposes.

GMO will conduct a class cost of service study to determine the differences in its costs to serve each of the customer classes in both the MPS and the L&P rate districts. Staff and GMO will develop the study schedule.

Issue III.8. **L&P Phase In:** (GMO: Rush; Staff: Wells & Lyons) Should the rate changes addressed in the Commission's Report and Order in GMO's last rate case to phase-in rates in the L&P district be ended early and, instead, should the annual amount of a three-year amortization of the unrecovered phase-in amount be included in the L&P revenue requirement?

Resolution: The phase-in of the rate increase in the L&P rate district that was the subject of Case Nos. ER-2012-0024 and ER-2010-0356 shall be terminated early and the unrecovered portion of the remaining increase plus carrying costs the Commission ordered be recovered shall be included in the revenue requirement for the L&P rate district in this case at the annual amount of \$1,870,245. The annual amount of \$1,870,245 is based on a three-year amortization of the unrecovered portion of the remaining increase plus carrying costs. To the extent that GMO's general rates that include this annual amount for more than three years, GMO shall pro rate the annual amount by the time period beyond three years and shall reduce the revenue requirement upon which it bases its subsequent general electric rate increase to return that amount to its retail customers in its L&P rate district.

Issue III.9. **ADIT – FAC:** (GMO: Hardesty; Staff: Hyneman) Should GMO's rate base be reduced by the accumulated deferred income taxes related to GMO's Fuel Adjustment Clause ("FAC")?

Additionally, the following matters are resolved:

1. **Jurisdictional Allocations:** The demand allocation factor shall be 52.70% for purposes of allocations to the KCPL Missouri retail jurisdiction using the 4-CP methodology to be reflected in Staff's and Company's models for the true-up in this cases.
2. **Hedging Costs:** A normalized level of hedging costs for hedging spot market electricity purchases with natural gas futures shall be included in GMO's revenue requirements for its MPS and L&P rate districts.

3. **Transmission and Distribution Plant:** Upon Commission approval of this Stipulation GMO will reduce its transmission and distribution plant rate base by a total of \$8.0 million, 65% for MPS and 35% for L&P, to be reflected in Staff’s and Company’s models for the true-up in this cases. GMO agrees it will not request recovery of this reduction by any means, directly or indirectly, in the future. GMO will provide to Staff plant accounting records that identify exclusion of these amounts from future rate base consideration.

<u>Transmission & Distribution Plant</u>				
FERC USOA Account Number				
		MPS	L&P	Total
355	Transmission - Poles & Fixtures	\$626,874	\$775,306	\$1,402,180
356	Transmission - Cond & Devices	\$1,196,710	\$2,024,694	\$3,221,405
365	Distribution - OH Conductor	\$3,055,085		\$3,055,085
366	Distribution - UG Circuit	\$321,331		\$321,331
	Total	\$5,200,000	\$2,800,000	\$8,000,000

4. **Tariff consolidation:** KCPL will consolidate its tariff sheets into a single tariff. KCPL will provide to Staff proposed tariff sheets to do so within 90 days of the effective date of new rates in Case No. ER-2012-0174 and will use its best efforts to have in effect a single tariff schedule within six months of the effective date of new rates in Case No. ER-2012-0174.
5. **Miscellaneous Tariff issues:** The following changes will be made to KCPL tariff sheets:
- Small, Medium, Large General Service: add (Frozen) to the three General Service All Electric classes and Standby or Breakdown Service;
 - Rate Schedule “1-SA”: delete “1-”;
 - Municipal Street Lighting Service (Urban Area) - Rate Schedule “1-ML”: delete “1-”;
 - Municipal Traffic Control Signal Service – Rate Schedule “1-TR”: delete “1-”;
 - Sheet Nos. 35, 35A, 35B, 35C: delete “-1” these sheets from “1-ML”;
 - Sheet Nos. 37, 37A – 37G - Rate Schedule “1-TR”: delete the “1-”;
 - Municipal Street Lighting Service (Suburban Area) - Rate Schedule “3-ML”: delete “-3”;
 - Sheet Nos. 36, 36A, 36B: change these sheets from “3-ML” to “ML”;

- Municipal Street Lighting Service – LED Pilot GMO tariff sheet No. 134: remove the reference to Peculiar, Missouri;
- Sheet No. 43Z.1 – Header, Cancelling line, Sheet No. “43.Z1”: change to “43Z.1”;
- Municipal Street Lighting Service – LED Pilot: tariff sheets Nos. 48, 49, 50 will be renumbered to 48, 48A, 48B;

The following changes will be made to GMO tariff sheets:

- Tariff sheet 134 will include a reference to Peculiar, Missouri;
- Tariff Sheet No. 29, LARGE GENERAL SERVICE ELECTRIC: the tariff language heading will be changed to BASE RATE, MO938 (Primary), MO939 (Substation), MO940 (Secondary);
- Tariff Sheet No. 31, LARGE POWER SERVICE ELECTRIC: the tariff language heading will be changed to BASE RATE, MO944 (Secondary), MO945 (Primary), MO946 (Substation), MO947 (Transmission);
- Tariff Sheet No. 34, PRIMARY DISCOUNT RIDER ELECTRIC, under the AVAILABILITY section: the tariff language will read “Available to customers served under Large General Service or Large Power rate schedules who receive three phase alternating-current electric service at a primary voltage level or above, and who provide and maintain all necessary transformation and distribution equipment beyond the point of Company metering”. This will replace the current tariff language, “Available to customers served under rate schedules MO940 or MO944 who receive three-phase alternating-current electric service at a primary voltage level and who provide and maintain all necessary transformation and distribution equipment beyond the point of Company metering.”

GENERAL PROVISIONS

1. Contingent upon Commission approval of this Stipulation without modification, the Signatories hereby stipulate to the admission into the evidentiary record of the testimony of their witnesses on the issues that are resolved by this Stipulation.

2. This Stipulation is being entered into solely for the purpose of settling the issues/adjustments in these cases explicitly set forth above. Unless otherwise explicitly provided herein, none of the Signatories to this Stipulation shall be deemed to have approved or acquiesced in any ratemaking or procedural principle, including, without limitation, any cost of

service methodology or determination, depreciation principle or method, method of cost determination or cost allocation or revenue-related methodology. Except as explicitly provided herein, none of the Signatories shall be prejudiced or bound in any manner by the terms of this Stipulation in this or any other proceeding, regardless of whether this Stipulation is approved.

3. This Stipulation is a negotiated settlement. Except as specified herein, the Signatories to this Stipulation shall not be prejudiced, bound by, or in any way affected by the terms of this Stipulation: (a) in any future proceeding; (b) in any proceeding currently pending under a separate docket; and/or (c) in this proceeding should the Commission decide not to approve this Stipulation, or in any way condition its approval of same.

4. This Stipulation has resulted from extensive negotiations among the Signatories, and the terms hereof are interdependent. If the Commission does not approve this Stipulation unconditionally and without modification, then this Stipulation shall be void and no Signatory shall be bound by any of the agreements or provisions hereof.

5. This Stipulation embodies the entirety of the agreements between the Signatories in this case on the issues addressed herein, and may be modified by the Signatories only by a written amendment executed by all of the Signatories.

6. If approved and adopted by the Commission, this Stipulation shall constitute a binding agreement among the Signatories. The Signatories shall cooperate in defending the validity and enforceability of this Stipulation and the operation of this Stipulation according to its terms.

7. If the Commission does not approve this Stipulation without condition or modification, and notwithstanding the provision herein that it shall become void, (1) neither this Stipulation nor any matters associated with its consideration by the Commission shall be

considered or argued to be a waiver of the rights that any Signatory has for a decision in accordance with RSMo. §536.080 or Article V, Section 18 of the Missouri Constitution, and (2) the Signatories shall retain all procedural and due process rights as fully as though this Stipulation had not been presented for approval, and any suggestions, memoranda, testimony, or exhibits that have been offered or received in support of this Stipulation shall become privileged as reflecting the substantive content of settlement discussions and shall be stricken from and not be considered as part of the administrative or evidentiary record before the Commission for any purpose whatsoever.

8. If the Commission accepts the specific terms of this Stipulation without condition or modification, only as to the issues in these cases explicitly set forth above, the Signatories each waive their respective rights to present oral argument and written briefs pursuant to RSMo. §536.080.1, their respective rights to the reading of the transcript by the Commission pursuant to §536.080.2, their respective rights to seek rehearing pursuant to §536.500, and their respective rights to judicial review pursuant to §386.510. This waiver applies only to a Commission order approving this Stipulation without condition or modification issued in this proceeding and only to the issues that are resolved hereby. It does not apply to any matters raised in any prior or subsequent Commission proceeding nor any matters not explicitly addressed by this Stipulation.

REPRESENTATIONS REGARDING NON-SIGNATORIES

1. The Office of the Public Counsel has authorized the Signatories to represent in this Stipulation that that Public Counsel does not oppose this Stipulation; they hereby do so.

WHEREFORE, for the foregoing reasons, the Signatories respectfully request that the Commission issue an Order approving the terms and conditions of this Non-Unanimous Stipulation and Agreement.

Respectfully submitted,

STAFF OF THE MISSOURI PUBLIC
SERVICE COMMISSION

KANSAS CITY POWER & LIGHT
COMPANY and KCP&L GREATER
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 19th day of October 2012.

/s/ Nathan Williams

Pension and OPEB – Stipulated Amounts – ER-2012-0174 and ER-2012-0175

Kansas City Power & Light – ER-2012-0174

Pensions

- KCP&L's Missouri jurisdictional rates established in this case, ER-2012-0174 effective January 27, 2013, are based on \$41,125,866, (total Company) for annual pension cost expensed under FAS 87, after removal of capitalized amounts and the portion of KCP&L's annual pension cost which is allocated to KCP&L's joint owners in the Iatan and La Cygne generating units/stations, but before inclusion of allowable SERP pension costs and amortization of pension-related regulatory assets/liabilities.
- KCP&L's Prepaid Pension Asset balance included in rate base, exclusive of the joint owners' shares, is \$34,504,775 (total Company) (\$18,448,218 Missouri jurisdictional) at March 31, 2012.
- KCP&L's FAS 87 Regulatory Asset included in rate base for the cumulative difference between pension cost recognized in its prior rates and its actual pension costs under FAS 87 is \$22,525,908 (total Company) (\$12,043,633 Missouri jurisdictional at March 31, 2012, exclusive of any amount allocated to KCP&L's joint owners.
- KCP&L's rates reflect the 5-year amortization of the \$22,525,908 FAS 87 Regulatory Asset identified in the prior paragraph at an annual rate before capitalization of \$4,505,182 (total Company). KCP&L will amortize \$3,550,534 (total Company), after capitalization, to pension expense annually beginning with the effective date of rates established in this case, File No. ER-2012-0174.
- KCP&L's rates reflect the 5-year amortization of the \$11,195,684 (total Company) FAS 88 Regulatory Asset (2011 Vintage) at an annual rate before capitalization of \$2,239,137 (total Company). KCP&L will amortize \$1,679,129 (total Company), after capitalization, to pension expense annually beginning with the effective date of rates established in this case, File No. ER-2012-0174.
- KCP&L's rates reflect the continuation of the 5-year amortization of FAS 158 deferred regulatory asset established in ER-2009-0089 at the annual level of \$1,121,527 (total Company) after capitalization.

OPEB'S

- KCP&L's Missouri jurisdictional rate established in this case, ER-2012-0174 effective January 27, 2013, is based on \$6,874,177, (total Company) for annual OPEB cost expensed under FAS 106, after removal of capitalized amounts, amounts pertaining to the Wolf Creek Generating Station and the portion of KCP&L's annual OPEB cost which is allocated to KCP&L's joint owners in the Iatan and La Cygne generating units/stations. OPEB costs for Wolf Creek Generating Station are included based on the \$369,128 amount paid to the Wolf Creek Nuclear Operating Corporation.

- KCP&L's Prepaid OPEB Asset balance included in rate base, exclusive of the joint owners' shares, is \$0 (total Company) at March 31, 2012.
- KCP&L's FAS 106 Regulatory Asset included in rate base for the cumulative difference between pension cost recognized in its prior rates and its actual OPEB costs under FAS 106 is (\$951,254) (total Company) ((\$508,595) Missouri jurisdictional) at March 31, 2012, exclusive of any amount allocated to KCP&L's joint owners.
- KCP&L's rates reflect the 5-year amortization of the (\$951,254) FAS 106 Regulatory Asset identified in the prior paragraph at an annual rate before capitalization of \$(190,251) (total Company). KCP&L will amortize \$(149,937) (total Company), after capitalization, to pension expense annually beginning with the effective date of rates established in this case, File No. ER-2012-0174.
- KCP&L's rates reflect the continuation of the 5-year amortization of FAS 158 deferred regulatory asset established in ER-2009-0089 at the annual level of \$305,003 (total Company) after capitalization.

KCPL Greater Missouri Operations – ER-2012-0175

Pensions

- MPS and L&P Missouri jurisdictional rates established in this case, ER-2012-0175 effective January 27, 2013, are based on \$7,349,684 and \$1,934,673, respectively, (total Company) for annual pension cost expensed under FAS 87, after removal of capitalized amounts and including the MPS and L&P portions of KCP&L's annual pension cost which is allocated to KCP&L's joint owners in the Iatan and La Cygne generating units/stations, but before inclusion of allowable SERP pension costs and amortization of pension-related regulatory assets/liabilities.
- MPS and L&P Prepaid Pension Asset balances included in rate base are \$13,849,256 and \$4,017,115, respectively (total Company), at March 31, 2012. (MPS retail jurisdictional of \$13,776,409; L&P electric of \$3,684,792.)
- MPS and L&P FAS 87 Regulatory Assets included in rate base for the cumulative difference between pension cost recognized in its prior rates and its actual pension costs under FAS 87 is \$5,036,054 and \$367,835, respectively (total Company), at March 31, 2012. (MPS retail jurisdictional of \$5,009,564; L&P electric of \$337,405.)
- MPS and L&P rates reflect the 5-year amortization of the \$5,036,054 and \$367,835, respectively, FAS 87 Regulatory Assets identified in the prior paragraph at an annual rate before capitalization of \$1,007,211 and \$73,567, respectively (total Company). MPS and L&P will amortize \$718,242 and \$52,961, respectively (total Company), after capitalization, to pension expense annually beginning with the effective date of rates established in this case, File No. ER-2012-0175.
- MPS and L&P rates reflect the 5-year amortization of the \$4,114,085 and \$1,564,462, respectively, FAS 88 Regulatory Asset (2011 Vintage) at an annual

rate before capitalization of \$822,817 and \$312,892, respectively (total Company). MPS and L&P will amortize \$586,751 and \$225,251, respectively (total Company), after capitalization, to pension expense annually beginning with the effective date of rates established in this case, File No. ER-2012-0175.

Amortization of Prior Regulatory Asset

- ERISA Tracker (Prior Method) – Deferred amounts as of March 31, 2012 for MPS and L&P-Electric respectively, are \$10,987,776 (\$10,929,980 retail) and \$1,675,535 including amounts capitalized. The annual amortization included in cost of service with the effective date of new rates in this case is \$1,609,050 and \$252,671, respectively, excluding amounts capitalized.
- L&P Prepaid Pension Asset (Prior Method) - The customer rates established in this case for L&P will include a \$3,352,742 annual provision prior to capitalization (\$2,527,967 excluding amounts capitalized) for electric jurisdictional prepaid pension amortization. The unamortized balance of the regulatory asset established as result of this ratemaking treatment is included in the L&P-Electric rate base. The unamortized balance at March 31, 2012 is \$4,386,504 (electric).

OPEB'S

- MPS and L&P Missouri jurisdictional rates established in this case, ER-2012-0175 effective January 27, 2013, are based on \$3,496,533 and \$1,157,989, respectively (total Company), for annual OPEB cost expensed under FAS 106, after removal of capitalized amounts and including its portion of KCP&L's annual OPEB cost which is allocated to KCP&L's joint owners in the Iatan and La Cygne generating units/stations.
- MPS and L&P Prepaid OPEB Asset balances included in rate base are \$0 and \$0, respectively (total Company) at August 31, 2012.
- MPS and L&P FAS 106 Regulatory Assets included in rate base for the cumulative difference between pension cost recognized in its prior rates and its actual OPEB costs under FAS 106 are (\$173,495) and (\$170,406), respectively (total Company) at March 31, 2012. (MPS retail of (\$172,582; L&P electric of (\$156,309)).
- MPS and L&P rates reflect the 5-year amortization of the (\$173,495) and (\$170,406), respectively, FAS 106 Regulatory Asset identified in the prior paragraph at an annual rate before capitalization of (\$34,699) and (\$34,081), respectively (total Company). MPS and L&P will amortize (\$24,744) and (\$24,535), respectively (total Company), after capitalization, to OPEB expense annually beginning with the effective date of rates established in this case, File No. ER-2012-0175.

**KCPL - REALLOCATION OF GENERAL PLANT UNRECOVERED RESERVE
MISSOURI JURSDICITIONAL AMOUNTS BASED ON KCPL DEPRECIATION STUDY
AS OF DECEMBER 31, 2011**

Account	Book Reserve	Transfer Unrecovered Reserve	Book Reserve Reallocated	General Plant Retirements
35300	\$27,213,634	(\$8,863,678)	\$18,349,956	\$0
38900	\$0	\$0	\$0	\$0
39000	\$11,985,721	(\$2,000,000)	\$9,985,721	\$0
39100	\$3,630,920	\$221,054	\$3,851,974	\$1,886,974
39101	\$907,739	(\$64,739)	\$843,000	\$0
39102	\$268,505	\$304,897	\$573,402	\$161,402
39200	\$244,754	\$0	\$244,754	\$0
39201	\$872,550	(\$0)	\$872,550	\$0
39202	\$2,426,546	(\$0)	\$2,426,546	\$0
39203	\$136,097	(\$0)	\$136,097	\$0
39204	\$409,305	\$0	\$409,305	\$0
39300	\$320,862	(\$37,578)	\$283,284	\$98,184
39400	\$1,216,719	\$15,422	\$1,232,141	\$420,141
39500	\$1,722,414	(\$155,429)	\$1,566,985	\$172,985
39600	\$2,544,388	\$0	\$2,544,388	\$0
39700	\$6,316,619	\$10,547,544	\$16,864,163	\$558,368
39701	\$41,418	\$0	\$41,418	\$0
39702	\$2,787	\$0	\$2,787	\$0
39800	\$59,477	\$32,507	\$91,984	\$20,184
Total	\$60,320,453	\$0	\$60,320,453	\$3,318,238

Note:

Transfer of \$ 10,863,678 unrecovered reserve will be transferred to account 35300 and 39000.
Assets in the general plant retirement column will be retired by the end of 2012.

KCPL - COMPUTATION OF GENERAL PLANT RETIREMENTS - MISSOURI JURSDICTION
 BASED ON PLANT BALANCES AS OF DECEMBER 31, 2011
 FOR THE YEAR 2012

Utility Account	Eng in Svc Year	Assets to Retire	Allocation Factor	Missouri Jurisdiction	
39100	1974	\$0.00	53.7720%	\$0.00	
	1976	\$22,979.92	53.7720%	\$12,356.76	
	1977	\$4,560.60	53.7720%	\$2,452.33	
	1978	\$5,810.24	53.7720%	\$3,016.74	
	1979	\$21,876.97	53.7720%	\$11,656.14	
	1980	\$45,577.62	53.7720%	\$24,508.00	
	1981	\$7,005.27	53.7720%	\$3,766.87	
	1982	\$37,918.96	53.7720%	\$20,389.78	
	1983	\$42,096.67	53.7720%	\$22,635.88	
	1984	\$231,497.35	53.7720%	\$124,480.76	
	1985	\$149,694.47	53.7720%	\$80,493.71	
	1986	\$113,097.59	53.7720%	\$60,814.84	
	1987	\$11,486.86	53.7720%	\$6,176.71	
39100 Total	1988	\$25,017.73	53.7720%	\$13,452.53	
	1989	\$179,074.14	53.7720%	\$96,291.75	
	1990	\$38,709.93	53.7720%	\$20,815.10	
	1991	\$2,573,209.19	53.7720%	\$1,383,666.05	
		<u>\$3,509,212.51</u>		<u>\$1,886,973.75</u>	
	39102	2000	\$253,083.33	53.7720%	\$136,087.97
		2003	\$47,076.46	53.7720%	\$25,313.95
	39102 Total		<u>\$300,159.79</u>		<u>\$161,401.92</u>
	39300	1967	\$7,190.99	53.7720%	\$3,866.74
		1969	\$3,797.52	53.7720%	\$2,042.00
		1970	\$2,442.70	53.7720%	\$1,313.49
		1971	\$4,409.76	53.7720%	\$2,371.22
		1972	\$6,884.71	53.7720%	\$3,702.05
1973		\$789.34	53.7720%	\$424.44	
1974		\$2,883.96	53.7720%	\$1,550.76	
1975		\$6,804.86	53.7720%	\$3,659.11	
1976		\$3,046.81	53.7720%	\$1,638.33	
1977		\$16,940.30	53.7720%	\$9,109.14	
1978		\$23,718.20	53.7720%	\$12,753.75	
1979		\$1,046.51	53.7720%	\$562.73	
1980		\$4,115.14	53.7720%	\$2,212.79	
1981		\$6,052.04	53.7720%	\$3,254.30	
1982		\$31,234.11	53.7720%	\$16,795.21	
1983		\$38,661.17	53.7720%	\$20,788.88	
1984		\$7,259.29	53.7720%	\$3,903.47	
39300 Total		1985	\$12,765.11	53.7720%	\$6,864.05
	1986	\$2,550.00	53.7720%	\$1,371.19	
		<u>\$182,592.52</u>		<u>\$98,183.65</u>	
	1956	\$38,117.32	53.7720%	\$20,496.45	
	1957	\$7,024.94	53.7720%	\$3,777.45	
	1958	\$1,770.06	53.7720%	\$951.80	
	1959	\$145,691.82	53.7720%	\$78,341.41	
	1960	\$13,608.99	53.7720%	\$7,317.83	
	1961	\$7,574.12	53.7720%	\$4,072.76	
	1962	\$8,237.21	53.7720%	\$4,429.31	
	1963	\$44,051.15	53.7720%	\$23,687.18	
	1964	\$11,507.25	53.7720%	\$6,187.68	
	1965	\$68,797.75	53.7720%	\$36,993.93	
	1966	\$21,453.16	53.7720%	\$11,535.79	
	1967	\$11,208.88	53.7720%	\$6,027.24	
	1968	\$12,774.07	53.7720%	\$6,868.87	
	1969	\$38,757.45	53.7720%	\$20,840.66	
	1970	\$70,364.45	53.7720%	\$37,836.37	
1971	\$38,469.28	53.7720%	\$20,685.70		
1972	\$24,525.81	53.7720%	\$13,188.02		
1973	\$21,717.01	53.7720%	\$11,677.67		
1974	\$11,568.93	53.7720%	\$6,220.85		
1975	\$6,361.28	53.7720%	\$3,420.59		
1976	\$31,428.68	53.7720%	\$16,898.75		
1977	\$25,866.85	53.7720%	\$13,909.12		
1978	\$21,068.00	53.7720%	\$11,328.68		
1979	\$36,780.55	53.7720%	\$19,777.64		
1980	\$28,425.85	53.7720%	\$15,285.15		
1981	\$34,189.44	53.7720%	\$18,384.35		
39400 Total		<u>\$781,338.30</u>		<u>\$420,141.23</u>	
39500	1965	\$4,605.98	53.7720%	\$2,476.73	
	1966	\$14,045.23	53.7720%	\$7,552.40	
	1967	\$9,809.54	53.7720%	\$5,274.79	
	1968	\$5,337.94	53.7720%	\$2,870.32	
	1969	\$15,084.70	53.7720%	\$8,111.34	
	1970	\$19,633.01	53.7720%	\$10,557.06	
	1971	\$17,578.92	53.7720%	\$9,452.54	
	1972	\$12,165.19	53.7720%	\$6,541.47	
1973	\$46,271.47	53.7720%	\$24,881.09		

KCPL - COMPUTATION OF GENERAL PLANT RETIREMENTS - MISSOURI JURSDICTION
 BASED ON PLANT BALANCES AS OF DECEMBER 31, 2011
 FOR THE YEAR 2012

Utility Account	Eng In Svc Year	Assets to Retire	Allocation Factor	Missouri Jurisdiction
	1974	\$4,314.97	53.7720%	\$2,320.25
	1975	\$16,282.71	53.7720%	\$8,755.54
	1976	\$40,344.21	53.7720%	\$21,693.89
	1977	\$68,519.47	53.7720%	\$36,844.29
	1978	\$5,673.87	53.7720%	\$3,050.95
	1979	\$9,645.35	53.7720%	\$5,186.50
	1980	\$8,957.16	53.7720%	\$4,816.44
	1981	\$23,431.46	53.7720%	\$12,599.56
39500 Total		<u>\$321,701.18</u>		<u>\$172,985.16</u>
39700	1923	\$901.76	53.7720%	\$484.89
	1924	\$567.83	53.7720%	\$305.33
	1927	\$1,477.83	53.7720%	\$794.66
	1929	\$1,597.67	53.7720%	\$859.10
	1945	\$2,034.27	53.7720%	\$1,093.87
	1948	\$0.00	53.7720%	\$0.00
	1949	\$0.00	53.7720%	\$0.00
	1951	\$0.00	53.7720%	\$0.00
	1952	\$0.00	53.7720%	\$0.00
	1953	\$0.00	53.7720%	\$0.00
	1954	\$0.00	53.7720%	\$0.00
	1955	\$16,798.37	53.7720%	\$9,032.82
	1956	\$3,087.88	53.7720%	\$1,660.41
	1957	\$204.63	53.7720%	\$110.03
	1958	\$1,590.19	53.7720%	\$855.08
	1959	\$73,294.99	53.7720%	\$39,412.18
	1960	\$0.00	53.7720%	\$0.00
	1961	\$1,545.87	53.7720%	\$831.25
	1962	\$1,563.00	53.7720%	\$840.46
	1963	\$24,248.84	53.7720%	\$13,039.09
	1964	\$80,409.48	53.7720%	\$43,237.79
	1965	\$51,398.17	53.7720%	\$27,637.82
	1966	\$11,002.62	53.7720%	\$5,916.33
	1967	\$22,805.75	53.7720%	\$12,283.11
	1968	\$36,237.86	53.7720%	\$19,485.82
	1969	\$9,944.83	53.7720%	\$5,347.53
	1970	\$39,482.64	53.7720%	\$21,230.61
	1971	\$6,601.67	53.7720%	\$3,549.85
	1972	\$15,363.75	53.7720%	\$8,261.40
	1973	\$570,288.34	53.7720%	\$306,655.45
	1974	\$2,993.40	53.7720%	\$1,609.61
	1975	\$23,011.69	53.7720%	\$12,373.85
	1976	\$39,946.28	53.7720%	\$21,479.91
39700 Total		<u>\$1,038,399.61</u>		<u>\$558,368.24</u>
39800	1963	\$5,412.38	53.7720%	\$2,910.34
	1968	\$1,007.85	53.7720%	\$541.94
	1969	\$307.26	53.7720%	\$165.22
	1970	\$4,275.25	53.7720%	\$2,298.89
	1971	\$205.60	53.7720%	\$110.56
	1972	\$0.00	53.7720%	\$0.00
	1973	\$273.13	53.7720%	\$146.87
	1974	\$621.93	53.7720%	\$334.42
	1975	\$2,838.53	53.7720%	\$1,526.33
	1976	\$4,958.34	53.7720%	\$2,666.20
	1977	\$3,416.78	53.7720%	\$1,837.27
	1979	\$7,016.14	53.7720%	\$3,772.72
	1980	\$2,600.18	53.7720%	\$1,398.17
	1981	\$4,603.60	53.7720%	\$2,475.45
39800 Total		<u>\$37,536.97</u>		<u>\$20,184.38</u>
Grand Total		<u>\$6,170,940.88</u>		<u>\$3,318,238.33</u>

KCP&L - GREATER MISSOURI OPERATIONS
MPS JURISDICTION
BOOK RESERVE ALLOCATION FOR SETTLEMENT
AS OF DECEMBER 31, 2011

		BOOK	ACCOUNT 119300 TRANSFERRED	RESERVE	ADJUSTED	
ACCOUNT	RESERVE Per Depreciation Study	FROM ECORP	TRANSFER	BOOK RESERVE	General Plant Retirements	
(1)	(2)	(3)	(4)	(5)		
GENERAL PLANT						
390.00	STRUCTURES AND IMPROVEMENTS	3,419,158	(45,180)		3,373,978	0
OFFICE FURNITURE AND EQUIPMENT						
391.01	OFFICE FURNITURE AND EQUIPMENT					
	FULLY ACCRUED	870,534			870,534	870,534
	AMORTIZED	1,370,000			1,370,000	0
	TOTAL OFFICE FURNITURE AND EQUIPMENT	2,240,534			2,240,534	870,534
391.02	COMPUTERS					
	FULLY ACCRUED	991,870			991,870	991,870
	AMORTIZED	836,700			836,700	0
	TOTAL COMPUTERS	1,628,570			1,628,570	991,870
391.04	SOFTWARE					
	FULLY ACCRUED	183,463			183,463	183,463
	AMORTIZED	159,500			159,500	0
	TOTAL SOFTWARE	342,963			342,963	183,463
	TOTAL OFFICE FURNITURE AND EQUIPMENT	4,212,067			4,212,067	2,045,867
TRANSPORTATION EQUIPMENT						
392.00	AUTOS	157,336			157,336	0
392.01	LIGHT TRUCKS	621,510			621,510	0
392.02	HEAVY TRUCKS	2,448,138			2,448,138	0
392.03	TRACTORS	193,639			193,639	0
392.04	TRAILERS	786,827			786,827	0
392.05	MEDIUM TRUCKS	1,490,161	(1,561)		1,488,600	0
	TOTAL TRANSPORTATION EQUIPMENT	5,697,611			5,696,050	0
393.00	STORES EQUIPMENT					
	FULLY ACCRUED	67,205			67,205	67,205
	AMORTIZED	12,700			12,700	0
	TOTAL STORES EQUIPMENT	79,905			79,905	67,205
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT					
	FULLY ACCRUED	921,229			921,229	921,229
	AMORTIZED	1,682,000			1,682,000	0
	TOTAL TOOLS, SHOP AND GARAGE EQUIPMENT	2,603,229			2,603,229	921,229
395.00	LABORATORY EQUIPMENT					
	FULLY ACCRUED	242,414			242,414	242,414
	AMORTIZED	1,092,000			1,092,000	0
	TOTAL LABORATORY EQUIPMENT	1,334,414			1,334,414	242,414
396.00	POWER OPERATED EQUIPMENT	1,875,826			1,875,826	0
397.00	COMMUNICATION EQUIPMENT					
	FULLY ACCRUED	130,431			130,431	130,431
	AMORTIZED	5,430,000			5,430,000	0
	TOTAL COMMUNICATION EQUIPMENT	5,560,431			5,560,431	130,431
398.00	MISCELLANEOUS EQUIPMENT					
	FULLY ACCRUED	40,761			40,761	40,761
	AMORTIZED	87,170			87,170	0
	TOTAL MISCELLANEOUS EQUIPMENT	127,931			127,931	40,761
	TOTAL GENERAL PLANT	24,910,572	(46,740)	0	24,863,832	3,447,907
UNRECOVERED RESERVE ADJUSTMENT FOR AMORTIZATION						
OFFICE FURNITURE AND EQUIPMENT						
391.01	OFFICE FURNITURE AND EQUIPMENT	(123,390)	(228,633)	352,023	0	0
391.02	COMPUTERS	(679,132)	(5,248,745)	5,927,877	0	0
391.04	SOFTWARE	(94,010)	(6,942,136)	7,036,146	0	0
393.00	STORES EQUIPMENT	1,664		(1,664)	0	0
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	886,515	(15,220)	(871,295)	0	0
395.00	LABORATORY EQUIPMENT	311,621	(10,810)	(300,811)	0	0
397.00	COMMUNICATION EQUIPMENT	889,214	(1,511,306)	622,092	0	0
398.00	MISCELLANEOUS EQUIPMENT	(197,805)	(72,431)	270,236	0	0
	TOTAL UNRECOVERED RESERVE ADJUSTMENT FOR AMORTIZATION	994,677	(14,029,280)	13,034,603	0	0
STEAM AND TRANSMISSION						
311.00	STRUCTURES AND IMPROVEMENTS			(5,928,595)		
352.00	STRUCTURES AND IMPROVEMENTS			(81,148)		
353.00	STATION EQUIPMENT			(6,448,577)		
354.00	TOWERS AND FIXTURES			(22,692)		
358.00	OVERHEAD CONDUCTORS AND DEVICES			(550,323)		
358.00	UNDERGROUND CONDUCTORS AND DEVICES			(3,268)		
	TOTAL STEAM AND TRANSMISSION			(13,034,603)		
	TOTAL ELECTRIC PLANT	25,905,249	(14,076,020)	0	24,863,832	3,447,907

KCP&L - GREATER MISSOURI OPERATIONS
L&P JURISDICTION
BOOK RESERVE ALLOCATION FOR SETTLEMENT
AS OF DECEMBER 31, 2011

	ACCOUNT (1)	BOOK	ACCOUNT 119300 TRANSFERRED	RESERVE	ADJUSTED	General Plant Retirements
		RESERVE Per Depreciation Study (2)	FROM ECORP (3)	TRANSFER (4)	BOOK RESERVE (5)	
GENERAL PLANT						
390.00	STRUCTURES AND IMPROVEMENTS	2,040,268	(14,936)		2,025,332	0
391.01	OFFICE FURNITURE AND EQUIPMENT					
	FULLY ACCRUED	261,016			261,016	261,016
	AMORTIZED	364,900			364,900	0
	TOTAL OFFICE FURNITURE AND EQUIPMENT	625,916			625,916	261,016
391.02	COMPUTERS					
	FULLY ACCRUED	964,650			964,650	964,650
	AMORTIZED	321,300			321,300	0
	TOTAL COMPUTERS	1,285,950			1,285,950	964,650
391.04	SOFTWARE					
	FULLY ACCRUED	167,573			167,573	167,573
	AMORTIZED	98,700			98,700	0
	TOTAL SOFTWARE	266,273			266,273	167,573
	TOTAL OFFICE FURNITURE AND EQUIPMENT	2,178,139			2,178,139	1,393,239
	TRANSPORTATION EQUIPMENT					
392.00	AUTOS	1,972			1,972	0
392.01	LIGHT TRUCKS	206,136			206,136	0
392.02	HEAVY TRUCKS	1,488,002			1,488,002	0
392.04	TRAILERS	175,792			175,792	0
392.05	MEDIUM TRUCKS	466,142	(546)		465,596	0
	TOTAL TRANSPORTATION EQUIPMENT	2,338,044			2,337,498	0
393.00	STORES EQUIPMENT					
	FULLY ACCRUED	193,644			193,644	193,644
	AMORTIZED	10,625			10,625	0
	TOTAL STORES EQUIPMENT	204,269			204,269	193,644
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT					
	FULLY ACCRUED	313,947			313,947	313,947
	AMORTIZED	986,000			986,000	0
	TOTAL TOOLS, SHOP AND GARAGE EQUIPMENT	1,299,947			1,299,947	313,947
395.00	LABORATORY EQUIPMENT					
	FULLY ACCRUED	66,857			66,857	66,857
	AMORTIZED	391,000			391,000	0
	TOTAL LABORATORY EQUIPMENT	457,857			457,857	66,857
396.00	POWER OPERATED EQUIPMENT	296,552			296,552	0
397.00	COMMUNICATION EQUIPMENT					
	FULLY ACCRUED	370,683			370,683	370,683
	AMORTIZED	968,000			968,000	0
	TOTAL COMMUNICATION EQUIPMENT	1,338,683			1,338,683	370,683
398.00	MISCELLANEOUS EQUIPMENT					
	FULLY ACCRUED	10,736			10,736	10,736
	AMORTIZED	23,640			23,640	0
	TOTAL MISCELLANEOUS EQUIPMENT	34,376			34,376	10,736
	TOTAL GENERAL PLANT	10,188,135	(15,482)	0	10,172,653	2,349,106
UNRECOVERED RESERVE ADJUSTMENT FOR AMORTIZATION						
391.01	OFFICE FURNITURE AND EQUIPMENT	(443,972)	(66,320)	510,292	0	0
391.02	COMPUTERS	(122,030)	(1,652,394)	1,774,424	0	0
391.04	SOFTWARE	108,194	(2,451,507)	2,343,313	0	0
393.00	STORES EQUIPMENT	11,864		(11,864)	0	0
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	61,720	(5,196)	(46,524)	0	0
395.00	LABORATORY EQUIPMENT	114,906	(3,467)	(111,439)	0	0
397.00	COMMUNICATION EQUIPMENT	(727,846)	(526,602)	1,254,448	0	0
398.00	MISCELLANEOUS EQUIPMENT	10,602	(23,513)	12,911	0	0
	TOTAL UNRECOVERED RESERVE ADJUSTMENT FOR AMORTIZATION	(996,562)	(4,728,999)	5,725,561	0	0
TRANSMISSION						
352.00	STRUCTURES AND IMPROVEMENTS			(14,312)		
353.00	STATION EQUIPMENT			(159,073)		
355.00	POLES AND FIXTURES			(3,327,869)		
356.00	OVERHEAD CONDUCTORS AND DEVICES			(2,218,580)		
358.00	UNDERGROUND CONDUCTORS AND DEVICES			(5,227)		
	TOTAL TRANSMISSION			(5,725,561)		
	TOTAL ELECTRIC PLANT	9,191,573	(4,744,481)	0	10,172,653	2,349,106

KCP&L - GREATER MISSOURI OPERATIONS
ECORP

BOOK RESERVE ALLOCATION FOR SETTLEMENT
AS OF DECEMBER 31, 2011

ACCOUNT (1)	BOOK RESERVE Per Depreciation Study (2)	POSITION STATEMENT D. (3)	REALLOCATION (4)	ACCOUNT 119300		ADJUSTED BOOK RESERVE (7)	General Plant Retirements
				TRANSFERRED TO MOPUB (6)	TRANSFERRED TO SJLP (8)		
GENERAL PLANT							
390.00	STRUCTURES AND IMPROVEMENTS	(597,615)	721,096	45,180	14,936	213,587	0
391.01	OFFICE FURNITURE AND EQUIPMENT						
	OFFICE FURNITURE AND EQUIPMENT						
	FULLY ACCRUED	24,046				24,046	24,046
	AMORTIZED	2,885,000				2,885,000	0
	TOTAL OFFICE FURNITURE AND EQUIPMENT	2,609,046				2,609,046	24,046
391.02	COMPUTERS						
	FULLY ACCRUED	761,619				761,619	761,619
	AMORTIZED	4,264,000				4,264,000	0
	TOTAL COMPUTERS	5,025,619				5,025,619	761,619
391.04	SOFTWARE						
	FULLY ACCRUED	9,877,746				9,877,746	9,877,746
	AMORTIZED	6,200,000				6,200,000	0
	TOTAL SOFTWARE	16,077,746				16,077,746	9,877,746
	TOTAL OFFICE FURNITURE AND EQUIPMENT	23,688,365				23,688,365	10,630,365
392.05	TRANSPORTATION EQUIPMENT - MEDIUM TRUCKS	7,136		1,561	546	9,241	0
393.00	STORES EQUIPMENT	4,930				4,930	0
394.00	TOOLS, SHOPS AND GARAGE EQUIPMENT	17,930				17,930	0
395.00	POWER OPERATED EQUIPMENT	23,832				23,832	0
397.00	COMMUNICATION EQUIPMENT	279,000				279,000	0
398.00	MISCELLANEOUS EQUIPMENT	26,400				26,400	0
	TOTAL GENERAL PLANT	23,603,823	0	721,096	46,740	24,287,142	10,663,411
UNRECOVERED RESERVE ADJUSTMENT FOR AMORTIZATION							
391.01	OFFICE FURNITURE AND EQUIPMENT						
	OFFICE FURNITURE AND EQUIPMENT	(2,087,204)	1,702,251	228,033	69,320	0	0
391.02	COMPUTERS	(6,260,331)	(640,607)	5,248,745	1,652,394	0	0
391.04	SOFTWARE	(12,975,359)	4,221,178	(639,462)	6,942,136	2,461,607	0
393.00	STORES EQUIPMENT	6,148	(6,148)			0	0
394.00	TOOLS, SHOPS AND GARAGE EQUIPMENT	(27,119)	6,702	15,220	5,196	0	0
395.00	LABORATORY EQUIPMENT	0	(14,277)	10,810	3,487	0	0
397.00	COMMUNICATION EQUIPMENT	(923,892)	(1,114,246)	1,511,306	526,602	0	0
398.00	MISCELLANEOUS EQUIPMENT	9,166	(105,110)	72,431	23,513	0	0
	TOTAL UNRECOVERED RESERVE ADJUSTMENT FOR AMORTIZATION	(22,259,361)	4,221,178	(721,096)	14,029,280	4,728,969	0
	TOTAL ELECTRIC PLANT	1,245,462	4,221,178	0	14,076,020	4,744,461	10,663,411

Note:

A) Depreciation adjustment of \$ 4,221,178 is a credit to account 119003 and a debit to account 426500.

MOPUB - COMPUTATION OF GENERAL PLANT RETIREMENTS
 BASED ON PLANT BALANCES AS OF DECEMBER 31, 2011
 FOR THE YEAR 2012

Utility Account	Eng In Svc Year	Assets to Retire
39100	1980	\$8,262.39
	1981	\$6,286.91
	1982	\$18,494.53
	1983	\$37,675.83
	1984	\$79,839.58
	1985	\$9,106.70
	1986	\$12,605.87
	1987	\$12,118.53
	1988	\$37,128.36
	1989	\$598,636.98
	1990	\$19,535.34
1991	\$30,842.76	
39100 Total		\$870,533.78
39102	1984	\$0.00
	1985	\$0.00
	1986	\$0.00
	1987	\$0.00
	1988	\$0.00
	1989	\$0.00
	1990	\$0.00
	1991	\$0.00
	1992	\$0.00
	1993	\$0.00
	1994	\$0.00
	1995	\$0.00
	1996	\$10,000.00
	1997	\$260,101.83
	1998	\$314,894.47
1999	\$178,952.39	
2000	\$57,590.72	
2001	\$60,520.18	
2002	\$107,648.45	
2003	\$2,162.30	
39102 Total		\$991,870.34
39104	1995	\$23,510.97
	1996	\$32,436.13
	1997	\$65,215.27
	1998	\$0.00
	2000	\$33,336.39
	2001	\$1,690.96
	2002	\$27,273.75
39104 Total		\$183,463.47
39300	1967	\$4,970.48
	1974	\$12,114.72
	1976	\$10,251.45
	1977	\$2,263.46
	1980	\$4,055.79
	1985	\$33,548.70
39300 Total		\$67,204.60
39400	1947	\$547.31
	1951	\$2,537.97
	1952	\$559.71
	1953	\$682.95
	1954	\$1,325.67
	1955	\$1,906.11
	1956	\$756.09
	1957	\$1,592.60
	1958	\$1,217.70
	1959	\$0.00
	1960	\$10,429.09
	1961	\$9,696.51
	1962	\$10,670.10
1963	\$590.75	
1964	\$5,909.52	

MOPUB - COMPUTATION OF GENERAL PLANT RETIREMENTS
 BASED ON PLANT BALANCES AS OF DECEMBER 31, 2011
 FOR THE YEAR 2012

Utility Account	Eng In Svc Year	Assets to Retire
	1965	\$2,824.25
	1966	\$12,405.08
	1967	\$12,972.14
	1968	\$10,922.85
	1969	\$58,681.29
	1970	\$7,804.16
	1971	\$4,665.33
	1972	\$19,595.33
	1973	\$5,035.60
	1974	\$20,111.25
	1975	\$9,086.82
	1976	\$30,998.55
	1977	\$15,786.48
	1978	\$39,456.44
	1979	\$155,642.66
	1980	\$49,617.62
	1981	\$37,409.23
	1982	\$23,061.66
	1983	\$88,808.14
	1984	\$79,006.95
	1985	\$137,676.80
	1986	\$51,238.66
39400 Total		\$921,229.37
39500	1951	\$539.00
	1954	\$712.79
	1955	\$566.76
	1958	\$3,787.46
	1960	\$0.00
	1961	\$1,276.47
	1962	\$1,895.67
	1966	\$2,401.19
	1968	\$1,159.46
	1969	\$2,607.26
	1970	\$0.00
	1971	\$803.23
	1972	\$8,218.93
	1973	\$695.17
	1974	\$31,520.93
	1975	\$1,690.77
	1976	\$2,764.27
	1977	\$35,803.46
	1978	\$13,532.14
	1979	\$8,817.69
	1980	\$117,675.06
	1981	\$5,945.94
39500 Total		\$242,413.65
39700	1953	\$1,104.29
	1957	\$2,254.77
	1958	\$1,649.95
	1960	\$2,767.31
	1964	\$485.63
	1968	\$0.00
	1971	\$993.41
	1972	\$2,052.72
	1973	\$0.00
	1974	\$38,891.32
	1975	\$997.00
	1976	\$37,756.97
	1977	\$9,499.15
	1978	\$21,205.00
	1980	\$2,195.92
	1981	\$3,169.23
	1982	\$1,409.95
	1983	\$3,998.80
39700 Total		\$130,431.42

**MOPUB - COMPUTATION OF GENERAL PLANT RETIREMENTS
 BASED ON PLANT BALANCES AS OF DECEMBER 31, 2011
 FOR THE YEAR 2012**

Utility Account	Eng In Svc Year	Assets to Retire
39800	1961	\$0.00
	1963	\$734.68
	1964	\$720.33
	1965	\$643.37
	1968	\$4,314.86
	1969	\$1,170.27
	1971	\$753.99
	1972	\$739.03
	1975	\$4,904.84
	1976	\$0.00
	1977	\$5,276.60
	1978	\$1,085.13
	1979	\$2,232.98
	1980	\$3,076.01
	1981	\$2,532.32
	1983	\$1,096.21
	1986	\$11,480.44
39800 Total		\$40,761.06
Grand Total		\$3,447,907.69

**SJLP - COMPUTATION OF GENERAL PLANT RETIREMENTS
 BASED ON PLANT BALANCES AS OF DECEMBER 31, 2011
 FOR THE YEAR 2012**

Utility Account	Eng In Svc Year	Assets to Retire
39100	1974	\$2,106.00
	1975	\$6,131.34
	1976	\$4,109.34
	1977	\$0.00
	1978	\$0.00
	1979	\$0.00
	1980	\$5,647.60
	1981	\$10,740.17
	1982	\$9,237.84
	1983	\$5,607.35
	1984	\$1,955.00
	1985	\$4,807.24
	1986	\$167.81
	1987	\$8,627.18
1988	\$18,691.13	
1989	\$86,011.97	
1990	\$14,913.22	
1991	\$82,262.99	
39100 Total		\$261,016.18
39102	1994	\$21,427.64
	1995	\$15,594.47
	1996	\$7,353.52
	1997	\$7,835.24
	1998	\$115,574.56
	1999	\$26,409.24
	2000	\$35,035.93
	2001	\$22,933.79
	2002	\$712,486.09
	39102 Total	
39104	1997	\$136,668.62
	1998	\$9,811.39
	1999	\$14,577.27
	2000	\$6,515.92
39104 Total		\$167,573.20
39300	1982	\$28,897.82
	1983	\$14,144.66
	1984	\$116,280.12
	1986	\$34,321.20
39300 Total		\$193,643.80
39400	1954	\$584.24
	1960	\$1,063.72
	1965	\$4,700.91
	1967	\$1,372.20
	1969	\$1,688.51
	1970	\$685.94
	1971	\$579.19
	1972	\$11,830.71
	1973	\$1,565.24
	1974	\$9,891.70
	1975	\$19,372.65
	1976	\$5,714.48
	1977	\$2,545.88
	1978	\$12,497.87
	1979	\$12,605.78
	1980	\$10,710.70
	1981	\$22,378.70
	1982	\$25,760.12
1983	\$47,936.92	
1984	\$26,305.17	
1985	\$55,189.01	
1986	\$38,967.05	
39400 Total		\$313,946.69

SJLP - COMPUTATION OF GENERAL PLANT RETIREMENTS
 BASED ON PLANT BALANCES AS OF DECEMBER 31, 2011
 FOR THE YEAR 2012

Utility Account	Eng In Svc Year	Assets to Retire	
39500	1957	\$4,512.71	
	1960	\$1,393.91	
	1963	\$520.09	
	1964	\$1,057.59	
	1966	\$821.92	
	1969	\$1,267.94	
	1970	\$1,400.42	
	1971	\$568.61	
	1972	\$1,640.29	
	1975	\$8,010.62	
	1977	\$828.82	
	1978	\$14,729.88	
39500 Total	1979	\$24,806.77	
	1980	\$534.71	
	1981	\$4,762.28	
		\$66,856.56	
	39700	1948	\$4,233.95
		1962	\$595.40
		1965	\$475.24
		1966	\$1,394.39
		1967	\$3,829.06
		1968	\$1,594.47
		1969	\$17,785.33
		1970	\$4,985.48
1971		\$5,046.91	
1972		\$3,546.37	
1973		\$12,330.08	
1974		\$7,272.24	
1975		\$11,514.36	
1976		\$17,623.03	
1977		\$7,973.88	
1978		\$18,597.50	
1979		\$28,737.97	
1980		\$30,012.88	
1981	\$87,301.91		
1982	\$63,415.42		
1983	\$34,916.01		
1984	\$7,500.74		
39700 Total		\$370,682.62	
39800	1971	\$885.95	
	1978	\$1,053.89	
	1981	\$1,351.08	
	1983	\$3,842.94	
	1985	\$3,601.74	
39800 Total		\$10,735.60	
Grand Total		\$2,349,105.13	

**ECORP - COMPUTATION OF GENERAL PLANT RETIREMENTS
 BASED ON PLANT BALANCES AS OF DECEMBER 31, 2011
 FOR THE YEAR 2012**

Utility Account	Eng In Svc Year	Assets to Retire
39100	1990	\$24,046.00
39100 Total		\$24,046.00
39102	1995	\$7,587.12
	1998	\$9,058.03
	2000	\$10,600.56
	2001	\$26,798.73
	2002	\$525,527.29
	2003	\$182,047.25
39102 Total		\$761,618.98
39104	1996	\$268,855.47
	1997	\$577,644.75
	1998	\$398,286.33
	1999	\$4,048,472.84
	2000	\$208,859.35
	2001	\$2,217,128.46
	2002	\$2,158,498.66
39104 Total		\$9,877,745.86
Grand Total		\$10,663,410.84