

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

In the Matter of Kansas City Power & Light)
Company’s Request for Authority to Implement) Case No. ER-2014-0370
A General Rate Increase for Electric Service)

**PUBLIC COUNSEL’S OBJECTION
TO NON-UNANIMOUS STIPULATION**

COMES NOW the Office of the Public Counsel (“Public Counsel”) and objects to the Non-Unanimous Stipulation and Agreement Regarding Class Kilowatt-Hours, Revenues and Billing Determinants, and Rate Switcher Revenue Adjustments (“Stipulation”) filed by Kansas City Power & Light Company and the Commission’s Staff on August 3, 2015, as follows:

Public Counsel hereby objects to the portion of the Stipulation that includes a \$500,000 rate switcher revenue adjustment that is speculative and that would occur outside the test year and true-up period. Public Counsel also objects to the delayed notification to customers for 90 days after rates are effective. As explained in Public Counsel’s reply brief:

Public Counsel objects to the proposed adjustment. First, it represents significant speculation and seeks to include potential revenue changes that *may* occur outside of the test year and true-up periods (Ex. 253, p.5). As Mr. Rush testified in the true-up hearing, the \$500,000 adjustment presumes that *all* customers that would benefit from a rate change actually make the change (Tr. 2036). Second, to the extent the Commission allows this out-of-period adjustment to revenues, it should only be allowed so long as customers that could benefit from a rate switch are *all* notified of that fact prior to new rates or at the same time that the new rates take effect. KCPL should not be allowed to assume the \$500,000 adjustment into rates before customers are even made aware of the benefits of switching rates. To do otherwise, KCPL would have no basis for including the amounts in rates during the period between the effective date of rates and when customers switch rates. If there is a delay between when new rates go into effect and when customers are notified, which will impact when customers will likely switch, the \$500,000 adjustment should be prorated to account for this delay in possible rate switching.

WHEREFORE, the Office of the Public Counsel respectfully objects to the Non-
Unanimous Stipulation and Agreement Regarding Class Kilowatt-Hours, Revenues and Billing
Determinants, and Rate Switcher Revenue Adjustments.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all
counsel of record this 7th day of August 2015.

/s/ Marc Poston
