

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

In the Matter of Kansas City Power & Light)
Company’s Request for Authority to) **Case No. ER-2012-0174**
Implement a General Rate Increase for)
Electric Service.)

In the Matter of KCP&L Greater Missouri)
Operations Company’s Request for Authority) **Case No. ER-2012-0175**
to Implement a General Rate Increase for)
Electric Service.)

STAFF’S MOTION FOR CLARIFICATION

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), and requests clarification of the Commission’s Report and Order as follows:

1. In its *Report and Order* issued January 9, 2013, at page 33, the Commission states that it “[i]s increasing KCPL’s first blocks of the residential space heating rates **and winter All-Electric General Services rates**, and GMO’s non-residential and residential rates, as Staff proposes.” [Emphasis added].

2. On pages 39-40 of its *Report and Order*, the Commission states Conclusions of Law under the heading “Increase Space Heating and All-Electric Rates.” There the Commission discusses Staff’s recommendations for the KCPL RESB and RESC rate schedules, but does not mention Staff’s similar recommendations for KCPL’s Small General Service (SGS), Medium General Service (MGS), and Large General Service (LGS)¹ rate schedules.

¹ See discussion, below of effect of rejection of *Non-Unanimous Stipulation and Agreement Regarding Class Cost of Service / Rate Design* (“*Stipulation*”)

3. Following that discussion of KCPL's RESB and RESC rate schedules the Commission states, "As to all Staff's proposed increases, the Commission concludes that safe and adequate service at just and reasonable rates finds the most support in the shifts that Staff proposes for KCPL. Therefore, the Commission will order those increase as Staff recommends."

4. As discussed in the Staff's *Response to MEEG's Motion for Clarification*, because the Commission did not adopt all the positions set out in the *Non-Unanimous Stipulation and Agreement Regarding Class Cost of Service / Rate Design* ("*Stipulation*"), Staff is not bound to the positions it took in that *Stipulation*.

5. In that *Stipulation*, Staff agreed, *inter alia*, to abandon its recommendation to increase the first block of the KCPL winter all electric LGS rate schedule.

6. However, since the Commission varied from the terms of the *Stipulation*—inconsistent with the *Stipulation* it did not "increase residential true-up revenues by 1.00% in addition to any other increase implemented by the commission," by the terms of the *Stipulation*, Staff reverted to its initial position of recommending increases to the first block of the KCPL winter all electric LGS rate schedule.

7. Staff seeks clarification that the Commission intended to order, and did order (1) Staff's recommended increases to the first block of the KCPL winter all electric SGS and MGS rate schedules, and (2) Staff's recommended increase to the first block of the KCPL winter all electric LGS schedule.

WHEREFORE, Staff respectfully requests the Commission clarify its Report and Order as to whether the Commission intended to order, and did order (1) Staff's recommended increases to the first block of the KCPL winter all electric SGS and MGS rate schedules, and (2) Staff's recommended increase to the first block of the KCPL winter all electric LGS schedule.

Respectfully submitted,

/s/ Sarah L. Kliethermes

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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 11th day of January, 2013.

/s/ Sarah L. Kliethermes