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 a General Rate Increase for Electric Service.

Case No. ER-2012-0174

REFORMATTED RECONCILIATION

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), and states as follows:

1. Per the request of Regulatory Law Judge Jordan at this morning's Discovery Conference, Staff has reformatted its Reconciliation document, which is attached hereto as Appendix A in Staff's Reconciliation for this case.

2. In addition to manipulating the document's borders, Staff has included in Line 2, headings indicating whether various columns indicate a "sub-total," a "sub-sub-total," or a sub-sub-total." Staff has also included in Line 2, headings indicating the

columns containing "Instructions," and "Explanations."

3. "Sub-totals," refer to aggregated amounts of many line items, applicable to the following areas:

- a. Rate of Return and Capital Structure Issues
- b. Rate Base Issues
- c. Revenue Issues
- d. Expense Issues

4. "Sub-sub-totals," refer to groups of line items that are aggregated into Sub-totals, such as the following examples that aggregate into the Rate Base Issues Subtotal:

a. Plant in Service

1

- b. Depreciation Reserve
- c. Additions to Net Plant
- d. Subtractions to Net Plant

5. "Sub-sub-totals" refer to the difference between the Company and the Staff on a given line item. Examples include:

- a. Fuel Inventory Coal
- b. Fuel Inventory Oil
- c. 365 day Adjustment
- d. Annualization of Large Power Service

6. Often, a given line item is specifically related to a question posed as an issue or a sub-issue on the issues list. However, many issues are interrelated, and frequently the dollar value associated with a particular issue on the issues list is dependent on how any number of other issues are resolved. In particular, the resolution of certain Rate of Return, Allocation, and Tax issues have a substantial impact on the valuation of other issues.

7. Staff works with the Company and with intervening parties to present as detailed and meaningful of a Reconciliation as is possible, but a given Reconciliation is a snapshot of a point in time. From time to time, the parties will fully anticipate a given line item to significantly decrease in magnitude pending one party or another updating its numbers. On such line items, Staff denotes "timing," in the Explanation column, to indicate that the issue is anticipated – though not guaranteed – to significantly decrease in magnitude.

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8. Staff auditors Karen Lyons, Keith Majors, and Cary Featherstone compile and maintain the Reconciliations, in coordination with John Weisensee and Christine Davidson with the Companies, as well as various experts on behalf of other intervening parties. Many of these auditors are scheduled to testify frequently throughout the hearing, and Staff would invite the Commission to freely discuss any questions concerning the information contained in the Reconciliations with these witnesses as they take the stand throughout the hearing.

WHEREFORE, Staff respectfully submits its Reformatted Reconciliation.

Respectfully submitted,

<u>/s/ Sarah Kliethermes</u>

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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 12th day of October, 2012.

/s/ Sarah Kliethermes

No. 1 Kansas City Power & Light Revenue Requirement Total Difference			86,430,011	·			112,547,915	
2	Sub-Sub-Sub Total	Sub-Sub-Total	<u>Sub-Total</u>	Instruction	Sub-Sub-Sub Total	Sub-Sub-Total	<u>Sub-Total</u>	Explanatio
Rate of Return & Capital Structure				mstruction				
4 Value of Capital Structure Issue - Staff / Company		3,706,266				(7,005,171)		timing
5 Capital Structure impact on Interest Expense Deduction		7,746,240				2,244,713		
6 Return on Equity Issue - KCPL-10.4%, Staff - 9.00%		(24,561,635)				(24,393,607)		
 Sub-Total Rate of Return and Capital Structure Differences 		(24,301,033)	(13,109,128)			(24,000,007)	(29,154,065)	
3			(13,109,120)				(23,134,003)	<u></u>
Rate Base Issues :								1
0 Plant in Service:								
3 Retirement of General Plant not in Company's March case	(265,961)				146,337			
4 Distribution Field Intelligence Support	(205,901)				(56,705)			
7 Plant not at Issue (Allocation Issue)	(3,328,641)				(8,882,596)			
8 Sub-Total - Plant in Service	(3,320,041)	(3,594,601)			(0,002,090)	(8,792,963)		
9		(0,004,001)				(0,792,903)		
Depreciation Reserve								
2 Acquisition detriment-premature retirements	(602,322)				(602,322)			
8 Retirement of General Plant not in Company's March case	265,951				(146,347)			
5 Depreciation Reserve (Allocation)	1,098,625				5,648,524			
6 Sub-Total - Depreciation Reserve	, ,	762,254				4,899,854		
7						· · ·		
Add to Net Plant								
O Cash Working Capital	1,680,836			Net with line 30,31 and 32	1,546,744			
) Federal Tax Offset	(164,300)			Net with line 29	(164,300)			
State Tax Offset	(34,682)			Net with line 29	(34,682)			
2 Interest Expense Offset	(1,229,690)			Net with line 29	(1,229,690)			
4 Sub-Total - Cash Working Capital		252,163		Net - lines 29 to 32		118,071		timing
5 Materials and Supplies		(2,784)				(2,705)		allocation
6 Prepayments		2,843				2,853		allocation
7 Prepaid Pension Asset		0				616,064		timing
8 Regulatory Asset Excess Act FAS 87 vs Rate Recovery		0				(137,634)		timing
 Regulatory Asset Demand Side Management 		0				(462,173)		timing
Regulatory Asset (Liab) - OPEB's		0				30,978		timing
Regulatory Asset - latan 1, 2 & Common Plant		0				41,513		timing
2 Fuel Inventory - Coal	(42,001)				55,019			<u>U</u>
3 Fuel Inventory - Oil	(9,844)				18,032			
4 Fuel Inventory Lime/Limestone/Ammonia	(11,395)				(14,928)			
5 Powder Activated Carbon (PAC)	11,509				11,509			
Sub-Total - Fossil Fuel Inventory		(51,731)				69,632		
Nuclear Fuel		10,690				(208,415)		timing
8 Renewable Energy Standards -100 % MO		0				(902,964)		
Renewable Energy Standards -Allocated		(474,301)				(25,687)		
Subtract from Net Plant								
2 Deferred Gain on SO2 Emissions-100% MO		0				(119,275)		timing
B Deferred Gain on SO2 Emissions-Allocated		(143)				2,434		timing
6 Accumulated Deferred Income Tax		(1,125,542)				2,424,792		
								4
) Sub Total - Rate Base Issues			(4,221,153)				(2,440,575)	4
Income Statement - Revenue Issues								
3 Booked Revenue - Unadjusted		78,501				78,501		allocation

Appendix A

CE.	Retail KWH Sales Revenue				1				
						(500.050)			
	Billing Adjustments	(568,858)				(568,858)			
	Weather Adjustment	279,655				279,655			
	Annualize Rate Change	88,774				88,774			
	Annualize Large Power Service	(102,064)				(102,064)			
	365 day Adjustment	(1,191,669)				(1,191,669)			
	Growth Adjustment	(3,554,706)				(3,554,706)			
	Eliminate test year tie to Revenue Rpt 1 - Note (b)	0	(= 0.40,000)			0	(= 0 (0 000)		
77	Sub-Total - Retail KWH Sales Revenue		(5,048,868)				(5,048,868)		
78			(4.0.45.000)				(4.0.45.000)		
	To annualize firm Bulk Sales-Energy		(1,045,800)				(1,045,800)		
	Firm Bulk Sales Capacity & Fixed		(37,967)				(37,967)		
	Return bulk margins-excess of 25th %, incl interest, over 10 yrs- (MO only)	(400.000)	(9,873)			(100.000)	(8,049)		immaterial
	Non Firm Off System Sales - Unadjusted Margins	(166,006)				(166,006)			· · · · · · · · · · · · · · · · · · ·
	Non Firm OSS for SPP off-system line losses	562,114			net with line 84	562,114			net with line 82
	Non firm OSS for Purchases for resale	(1,048,618)			net with line 84	(1,048,618)			net with line 82
	Non-Firm OSS for Revenue neutrality uplift charges	518,237			net with line 84	518,237			net with line 82
	Normalize Nonfirm Sales Margin	(11,904,793)			net w lines 81-85	(5,502,701)			net w lines 79-81
	Eliminate Cost of Bulk Power Sales	54,775	(44.004.000)			54,775			
88	Sub-Total - Non-Firm OSS	├ ──── ├	(11,984,292)				(5,582,199)		(**
	To adjust Late Payment Fees	├ ──── ├	(100,921)				(100,921)		timing
	Other Misc. & Adjustments	┨─────┤	1,890,339				1,718,124		(**
	Rent from Property -MO -latan Site Lease		0				22,548		timing
	Sales recorded below the line on KCPL's books		(328,262)				(328,262)	((,,,,,,,,,,,,,,,,,,,))	
	Sub Total - Revenue Issues			(16,587,143)				(10,332,894)	
100		· · · · · · · · · · · · · · · · · · ·			•				
101	Income Statement - Expense Issues								
102	Total Oper.& Maint. Expense - Unadjusted, excluding depreciation		(1,305,649)				(1,302,919)		allocation
103	Annualize Fuel Expense	12,103,378				14,575,186			
104	Annualize Purchased Power Energy Charges	(18,433,973)				(17,682,970)			
	Fuel and Purchase Power-Energy and Demand Costs		(6,330,594)				(3,107,784)		
	Annualize KCREC Bank Fees		(10)				(3,552)		timing
	Normalize Severence Costs (ORVS)		(969,796)				(969,796)		
	Normalize 401k costs		(42,907)				(42,907)		timing
110	Adjust FAS 87 and FAS 88 and FAS 158 pension expense		(1,110,755)				(1,339,232)		
	Adjust SERP pension expense		(181,169)				(244,709)		
	Adjust OPEB's		(177,761)				(138,399)		
114	latan 2 Common O&M - Ongoing level		(949,626)				(949,626)		timing
115	latan 2/Common O&M - Amortization of Tracker		(4,182)				(136,204)		timing
	Annualize Customer Accts expense for credit card payment costs		(82,815)				(14,970)		timing
	CS-11 Adjustment Incl Equity Compensation		13,836				17,858		allocation
	Annualized amount for injuires and damages		4,559				4,559		allocation
	Annualize Injuries and Damages Insurance		797				(4,430)		timing
	Annualized Property Insurance Electric and latan 2		61,099				(188,908)		timing
	Property Tax Annualization		(137,723)				(563,891)		timing
	Annualize Renewable Energy Standards (100% MO)		332,625				(1,935,784)		
	2011 Flood Amortization		(1,272,809)				(3,374,753)		
	Adjust Outside Services A/C 923		(156,359)				(156,359)		timing
	Amortization of latan 1, 2, & Common Regulatory Assets		705				1,274		timing
	Missouri Economic Relief Pilot Program (ERPP) (MO only)		(462,030)				(1,403,067)		
	Transmission of Electricity by Others		35,569				(8,556,739)		
	Advertising - Institutional and Image, Excluding DSM	┥───┤	(78)			┥┠────┼	(78)		allocation
	Adj (Staff) or Reverse (KCPL) test year gen tax exp for KCMO Earnings Tax		-		Footnote (a)		-		Footnote (a)
	NORMALIZE BAD DEBT-Rate & Weather normalized revenues	46,399				109,096			timing
	Add Incremental Bad Debt - Revenue Requirement	(784,163)				(1,011,179)	(000.000)		
142	Sub-Total - Bad Debt Expense	 	(737,764)				(902,083)		
	Amortization of SO2 Proceeds		(1)				4,144		timing
	Amortization of Merger Transition Costs	+ +	(3,868,803)				(3,868,803)		

146 Misc. Disallowances (excl dues/donations/advertising) 147 Payroll Annualization 148 Incentive Comp-Value Link (See CS-11 for Equity Comp) 152 Amortize DSM Deferral (excl DSM advertising)	(53,68) (1,353,43) (454,23)	2			(53,686)		timing
148Incentive Comp-Value Link (See CS-11 for Equity Comp)152Amortize DSM Deferral (excl DSM advertising)		5)					
152 Amortize DSM Deferral (excl DSM advertising)					(1,353,435)		
	(154,33	D)			(154,330)		timing
	-				(860,636)		timing
153 SPP Schedule 1 Admin Fees	(2,99				(899,109)		
154 Other Miscellanous Benefits	(1,042,75	4)			(1,042,754)		timing
155 Wolf Creek Refueling Outage	(265,84	1)			(265,841)		timing
156 Distribution Field Intelligence Support	-				(547,190)		
158 Annualize Commission Assessment	(22,76	5)			(225,038)		timing
160 REGULATORY EXPENSES-Rate Case Expense	117,71	3			(423,429)		
164 Annualize Depreciation Expense	1,489,550			563,321			
	(1,634,801)			(1,640,725)			
166 Total Oper.& Maint. Expense - Unadjusted Depreciation	(94,659)			(97,369)			
168 Sub-Total - Depreciation Expense	(239,91	2)		(01,000)	(1,174,772)		timing
170 O&M Maintenance Expense Adjustments - Nuclear	(715,86	,			(715,868)		timing
171 O&M Maintenance Expense Adjustments - Transmission	29,55	/			29,556		timing
172 O&M Maintenance Expense Adjustments - Distribution	(286,57				(286,573)		timing
		í l					Ŭ
173 Amortization - Limited Term Plant	2,56			├ ───┤	(1,096,835)		timing timing
174 Annualize Payroll Tax	(76,28	í l		┣────┤	(76,285)		timing
175 To Normalize lease expense	(11,06	<i>,</i>		├ ──── ├	(18,013)		timing
176 Adjust Dues & Donations	(28,63	<i>i</i>		┣────┤	(28,633)		timing
178 Reconcilement Error - O&M Expense	10		4		44		
179 Sub Total - Operations & Maintenance Expense Issues		(21,445,839)				(38,369,985)	
180							1
181 Income Tax Issues - Income Statement							
183 Annualized Depreciation Expense (Book)	869,12	3	Net with 184		290,324		timing
184 Depreciation on Vehicles/Unit Trains cleared to O&M	(818,67		Net with 183		(822,252)		timing
185 Book Amortization - Intangible Plant / Leaseholds	(29,13	/			(713,887)		timing
186 Meals & Entertainment	(234,84	/			(173,790)		timing
188 Nuclear Fuel Amortization - Add Back Book	178,23				178,233		timing
191 IRS Deduction - Amortization - Intangible Plant		<u>ן</u>			525,091		timing
192 IRS Deduction - Nuclear Fuel	(14,81	1)			(14,814)		timing
193 Production Income Deduction)			0		linnig
194 Employee 401-K ESOP deduction	(940,21	-	1		(940,211)		timing
195 Impact of Wind/R&D Credits	(66,88	/			(398,056)		timing
		/					timing
	(81,25	<i>′</i>	-		(81,256)		0
197 Tax Depreciation in Excess of S/L - Regular	(703,71	/	4		(2,283,784)		timing
198 Tax Amortization - Intangible Plant - Excess over S/L Amortization	23,24				182,954		timing
199 Tax Amortization-Nuclear Fuel - Excess over S/L Nuclear	(147,79	· · · · · · · · · · · · · · · · · · ·	4		(147,793)		timing
201 Tax Straight Line Depreciation IRS Deduct-Tax Depreciation)	4		2,033,336		timing
202 Amortization of Excess Deferred Tax)	4	·	18,753		timing
203 Investment Tax Credit	(1,144,36		4	ļ	(1,144,422)		
204 Amortization of Prior Deferred Taxes)	4		(654,380)		timing
210			4				
211 Total Income Tax Differences		(\$3,111,091)	1			(\$4,145,954)	
212							
213 Difference in Tax Gross Up Factor		(565,977)	Footnote (a)			(734,496)	Footnote (a)
214		`					
215 Total Value of All Issues		(\$59,040,331)	1	+		(\$85,183,019)	1
216			4	+		(\$30,100,010)	1
			┪ │	┟────┼		(000.070)	
217 Unreconciled Difference/Rounding		(225,157)		ļ		(200,373)	
218			EMS	├ ────			EMS
219 Staff Revenue Requirement at March 31, 2012		\$27,164,523				\$27,164,523	27,164,523
221 Unreconciled Difference/Rounding			(\$0)				(0)
222			diff from EMS				diff from EMS

223	Footnotes			
224				
225	a) There are multiple components of the Kansas City MO Earnings Tax is because Staff treated this as a general tax and KCPL treated it as an inc revenue requirement than KCP&L's by \$ 566,000 at 3-31-12 and \$734,00 Company's requested revenue requirement in this case and as reduced I ROR. If the authorized revenue requirement is different from that propose also change.	ome tax. When looked at in total, Staf 00 at Projected 8-31-12, including cons by the impact of the difference betweer	if's direct filing res sideration of earni n Staff and Comp	ults in a lower ngs tax on the any rate base and
226	b) Through discussions with the Company both Staff and Company realize filed surrebuttal testimony. The value of the issue is not yet quantified.	zed there is an issue with General Led	lger Revenues. T	he Company has
227	 c) Staff's adjustment for the arbitration settlement referenced in Staff's re schedules. 	buttal testimony was not included in St	taff's March 31, 20	012 accounting
228	Office of the Public Counsel			
229	Return on Equity - 9.1%		\$ 1,499,721	
230	Value of Capital Structure Issue - OPC/Staff		\$ (699,870)	
231	Capital Structure impact on Interest Expense Deduction		\$ (7,011,011)	
232	Rate Case Expense		\$ (473,893)	
233				
234	Office of the Public Counsel - Revenue Requirement		\$ (6,685,053)	20,479,470
235				
236	United States Department of Energy			
237	Return on Equity - 9.5%		\$ 8,765,034	
238	Value of Capital Structure Issue - DOE/Staff		\$ 6,598,771	
239	Capital Structure impact on Interest Expense Deduction		\$ (1,803,928)	
240				
241	United States Department of Energy - Revenue Requirement		\$ 13,559,876	40,724,399
242				
243	Missouri Industrial Energy Consumers			
244	Renewable Energy Standard Costs		\$ (2,072,871)	
245	OVRS		\$ (1,004,885)	
246	Bad Debt Expense		\$ (2,843,757)	
247	Overtime		\$ (809,807)	
248	SPP Line Loss Charges		\$ (775,347)	
249	Adjustment for purchase for resale		\$ (520,903)	
250	SPP RNU charges		Note 2	
251	Flood Cost Amortization-Lost OSS revenues		Note 1	
252	Mutual Assistance		\$ (468,000)	
253	Fuel Costs		\$ (812,000)	
254	Off System Sales Revenues		\$ (17,710,000)	
255	Transmission Revenues		Note 1	
256	Interim Energy Charge		Note 2	
257	Renewable Energy Standard Cost Tracker		Note 2	
258	Property Tax Tracker		Note 2	
259	Missouri Industrial Energy Consumers- Revenue Requirement		\$ (27,017,570)	146,953

Note 1: Annualization and identification of the amount performed at True-Up	
Note 2: No Revenue Requirement Value in the current case.	