

**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 Electric)
Service.)

Case No. ER-2006-0314
Tariff No. YE-2006-0594

AARP's RESPONSE IN SUPPORT OF APPLICATIONS FOR REHEARING

COMES NOW the AARP, and submits its support of the applications for rehearing submitted by Jackson County, Missouri on December 29, 2006, by the Office of the Public Counsel on December 29, 2006, and by the US Department of Energy/National Nuclear Security (DOE/NNSA) on December 29, 2006. The Commission's December 21, 2006 Report and Order is clearly unlawful, unjust, unreasonable, and not based on competent and substantial evidence on the whole record with regard to each of the points raised by these three parties.

The Commission's December 21, 2006 Report and Order is particularly erroneous with regard to the "additional amortizations" it approved in direct violation of Section 393.130 RSMo. 2000. These substantial amortizations were added on top of what the evidence in this shows a just and reasonable cost of service to be—purportedly applying the terms of a "Regulatory Plan" (to which AARP was not a signatory). Either the Commission misapplied the terms of that Regulatory Plan by blindly deferring its regulatory authority to Standard & Poor (S&P) or the Regulatory Plan itself is unlawful.

The Commission's Report and Order is also particularly erroneous with regard to the arbitrary and capricious manner in which the Commission adopted a return on equity. The Commission's application of its so-called "zone of reasonableness" is patently unreasonable and arbitrary and explained by the applications for rehearing referenced above. Among the several blatant errors in the Commission's decision on this issue, was the decision to ignore the testimony of DOE/NNSA witness Dr. Wooldridge. It was patently unlawful and unreasonable to refuse to even consider the cost of capital analysis of Dr. Wooldridge simply because the Commission did not like where the result of his analysis fell.

Respectfully submitted,

/s/ John B. Coffman

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties of record on this 12th day of December 2007:

/s/ John B. Coffman
