

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

In the Matter of the Application of Kansas City)
Power and Light Company for Approval to)
Make Certain Changes in its Charges for)
Electric Service to Implement its Regulatory)
Plan.)

Case No. ER-2007-0291

STAFF RECOMMENDATION TO APPROVE TARIFF SHEETS

Comes now the Staff of the Missouri Public Service Commission, by counsel, and for its recommendation to approve tariff sheets, to become effective January 1, 2008, for good cause shown pursuant to §393.140(11) RSMo, states:

1. On December 6, 2007, the Commission issued its Report and Order in this case in which it both addressed two separate nonunanimous stipulations and agreements and resolved contested issues. The two separate nonunanimous stipulations and agreements addressed separate issues and, after no party objected to them, the Commission treated them as unanimous agreements as permitted by Commission Rule 4 CSR 240-2.115(2).

2. In ordered paragraph 5 of its Report and Order the Commission stated, “Kansas City Power & Light Company shall file tariffs that comport with this Report and Order no later than December 13, 2007.”

3. In response, on December 13, 2007, Kansas City Power & Light Company filed tariff sheets.

4. The Staff has reviewed the filed tariff sheets to determine if they comport with the Commission’s Report and Order. The Staff concludes they do. In the attached Memorandum (Appendix A), the Staff recommends the Commission issue an Order that both (1) approves the electric tariff sheets listed in Appendix A, as filed on December 13, 2007, and substituted on

December 18, 2007, to become effective January 1, 2008 and (2) cancels Kansas City Power & Light Company's present electric tariff sheets listed to be canceled in Appendix A.

5. With regard to the revenue requirement Kansas City Power & Light Company presented in this case, the Commission's Report and Order in this case, and the operation of the amortization that is part of Kansas City Power & Light Company's Experimental Regulatory Plan approved and ordered by the Commission in Case No. EO-2005-0329, the Staff notes the following:

KCPL's filed case revenue requirement electric rate schedules were designed to increase KCPL's annual electric revenues by		\$45.4 million
Additional traditional revenue requirement per 12/6/07 Report and Order		\$ 24,585,087
Amortization resulting from KCPL's Experimental Regulatory Plan – total amortization		\$ 10,723,827
Total additional revenue requirement per 12/6/07 Report and Order, which will be reflected in rates		\$35,308,914

The Staff recommends the Commission specifically include in its Order approving KCPL's tariff sheets the above analysis and that KCPL's additional traditional revenue requirement per the Commission's December 6, 2007 Report and Order is \$24,585,087 and additional revenue requirement per the KCPL Experimental Regulatory Plan amortization is \$10,723,827.

6. Section 393.140(11) RSMo 2000 requires proposed changes to tariffs not go into effect with less than thirty (30) days' notice, unless the Commission determines otherwise for "good cause shown." Given that the Commission's Report and Order inescapably leads to the conclusion the Commission has found Kansas City Power & Light Company's existing tariff does not generate sufficient revenues and the Commission has authorized Kansas City Power & Light Company to file tariff sheets that "comport with [the Commission's] Report and Order," the purpose of the thirty (30) days' notice requirement of section 393.140(11) RSMo 2000 has

been accomplished. The Staff recommends the Commission grant Kansas City Power & Light Company's motion for expedited treatment and order the tariff sheets to become effective January 1, 2008.

WHEREFORE, the Staff recommends that the Commission issue an order that (1) grants Kansas City Power & Light Company's motion for expedited treatment to permit the tariff sheets filed December 13, 2007, and substituted on December 18, 2007 to go into effect January 1, 2008, (2) approves the electric tariff sheets listed in Appendix A, as filed on December 13, 2007, and substituted on December 18, 2007 to become effective January 1, 2008 and (3) cancels Kansas City Power & Light Company's present electric tariff sheets listed to be canceled in Appendix A.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
Deputy General Counsel
Missouri Bar No. 35512

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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 18th day of December 2007.

/s/ Nathan Williams

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. ER-2007-0291
File No. YE-2008-0369
Kansas City Power & Light Company

FROM: James Watkins, Project Coordinator
Mack McDuffey, Rate & Tariff Examiner II

/s/ James Watkins 12/18/07 /s/ Nathan Williams 12/18/07
Project Coordinator/Date General Counsel's Office/Date

SUBJECT: Staff Recommendation For **Approval** Of Tariff Sheets Filed To Comply With
The Commission's December 6, 2007 Report And Order

DATE: December 18, 2007

On December 13, 2007, Kansas City Power & Light Company (KCPL) filed with the Commission fifty-six (56) rates tariff sheets with an issue date of December 13, 2007, and a proposed effective date of January 12, 2008. KCPL also filed its Motion For Expedited Consideration And Approval Of Tariff Sheets Filed In Compliance With Commission Order On Less Than Thirty Days' Notice (Motion) dated December 13, 2007. These tariff sheets are designed to comply with Ordered Paragraph 5 of the Commission's December 6, 2007 Report And Order (Order), which states, "Kansas City Power & Light Company shall file tariffs that comport with this Report And Order no later than December 13, 2007." On December 18, 2007, KCPL, at the request of the Missouri Public Service Commission Energy Department Staff (Staff), filed five (5) substitute tariff sheets, then re-filed those five (5) substitute tariff sheets, then filed six (6) substitute tariff sheets to correct errors and address some of Trigen's concerns.

The Staff has reviewed the filed tariff sheets and is of the opinion that, based on an authorized increase in revenues of \$35,308,914 and the Staff's understanding of the Commission's decisions regarding Class Cost of Service and Rate Design, they are in compliance with the Commission's Order. Staff therefore recommends that the Commission **approve** the following proposed tariff sheets, as filed on December 13, 2007, and substituted on December 18, 2007, to become effective on January 1, 2008 as requested in KCPL's Motion, with less than 30 day's notice for good cause shown pursuant to Section 393.140(11) RSMo 2000.

Kansas City Power & Light Company, PSC Mo. No. 7, Electric Rates

4th Revised Sheet No. 5A, canceling 3rd Revised Sheet No. 5A
4th Revised Sheet No. 5B, canceling 3rd Revised Sheet No. 5B
4th Revised Sheet No. 8, canceling 3rd Revised Sheet No. 8
3rd Revised Sheet No. 8A, canceling 2nd Revised Sheet No. 8A
3rd Revised Sheet No. 9, canceling 2nd Revised Sheet No. 9
4th Revised Sheet No. 9A, canceling 3rd Revised Sheet No. 9A
4th Revised Sheet No. 9B, canceling 3rd Revised Sheet No. 9B
3rd Revised Sheet No. 10, canceling 2nd Revised Sheet No. 10
4th Revised Sheet No. 10A, canceling 3rd Revised Sheet No. 10A

4th Revised Sheet No. 10B, canceling 3rd Revised Sheet No. 10B
4th Revised Sheet No. 10C, canceling 3rd Revised Sheet No. 10C
3rd Revised Sheet No. 11, canceling 2nd Revised Sheet No. 11
4th Revised Sheet No. 11A, canceling 3rd Revised Sheet No. 11A
4th Revised Sheet No. 11B, canceling 3rd Revised Sheet No. 11B
4th Revised Sheet No. 11C, canceling 3rd Revised Sheet No. 11C
4th Revised Sheet No. 14A, canceling 3rd Revised Sheet No. 14A
4th Revised Sheet No. 14B, canceling 3rd Revised Sheet No. 14B
4th Revised Sheet No. 14C, canceling 3rd Revised Sheet No. 14C
3rd Revised Sheet No. 17, canceling 2nd Revised Sheet No. 17
4th Revised Sheet No. 17A, canceling 3rd Revised Sheet No. 17A
2nd Revised Sheet No. 17B, canceling 1st Revised Sheet No. 17B
2nd Revised Sheet No. 17C, canceling 1st Revised Sheet No. 17C
2nd Revised Sheet No. 17D, canceling 1st Revised Sheet No. 17D
3rd Revised Sheet No. 18, canceling 2nd Revised Sheet No. 18
4th Revised Sheet No. 18A, canceling 3rd Revised Sheet No. 18A
4th Revised Sheet No. 18B, canceling 3rd Revised Sheet No. 18B
4th Revised Sheet No. 18C, canceling 3rd Revised Sheet No. 18C
2nd Revised Sheet No. 18D, canceling 1st Revised Sheet No. 18D
2nd Revised Sheet No. 18E, canceling 1st Revised Sheet No. 18E
3rd Revised Sheet No. 19, canceling 2nd Revised Sheet No. 19
4th Revised Sheet No. 19A, canceling 3rd Revised Sheet No. 19A
4th Revised Sheet No. 19B, canceling 3rd Revised Sheet No. 19B
4th Revised Sheet No. 19C, canceling 3rd Revised Sheet No. 19C
2nd Revised Sheet No. 19D, canceling 1st Revised Sheet No. 19D
4th Revised Sheet No. 20C, canceling 3rd Revised Sheet No. 20C
3rd Revised Sheet No. 28B, canceling 2nd Revised Sheet No. 28B
4th Revised Sheet No. 30, canceling 3rd Revised Sheet No. 30
4th Revised Sheet No. 33, canceling 3rd Revised Sheet No. 33
4th Revised Sheet No. 35, canceling 3rd Revised Sheet No. 35
4th Revised Sheet No. 35A, canceling 3rd Revised Sheet No. 35A
4th Revised Sheet No. 35B, canceling 3rd Revised Sheet No. 35B
4th Revised Sheet No. 35C, canceling 3rd Revised Sheet No. 35C
4th Revised Sheet No. 35D, canceling 3rd Revised Sheet No. 35D
4th Revised Sheet No. 36, canceling 3rd Revised Sheet No. 36
4th Revised Sheet No. 36A, canceling 3rd Revised Sheet No. 36A
4th Revised Sheet No. 36B, canceling 3rd Revised Sheet No. 36B
4th Revised Sheet No. 37, canceling 3rd Revised Sheet No. 37
4th Revised Sheet No. 37A, canceling 3rd Revised Sheet No. 37A
4th Revised Sheet No. 37B, canceling 3rd Revised Sheet No. 37B
4th Revised Sheet No. 37C, canceling 3rd Revised Sheet No. 37C
4th Revised Sheet No. 37D, canceling 3rd Revised Sheet No. 37D
4th Revised Sheet No. 37E, canceling 3rd Revised Sheet No. 37E
4th Revised Sheet No. 37F, canceling 3rd Revised Sheet No. 37F
4th Revised Sheet No. 37G, canceling 3rd Revised Sheet No. 37G
4th Revised Sheet No. 45, canceling 3rd Revised Sheet No. 45
4th Revised Sheet No. 45A, canceling 3rd Revised Sheet No. 45A

The Staff has verified that KCPL has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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

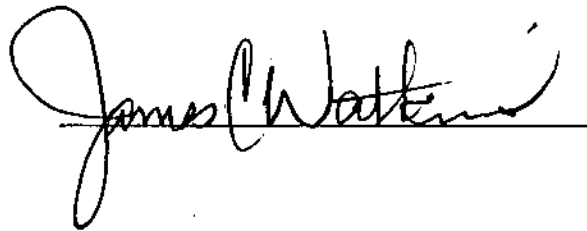
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Case No. ER-2007-0291
Tariff No. YE-2008-0369

AFFIDAVIT OF JAMES C. WATKINS

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

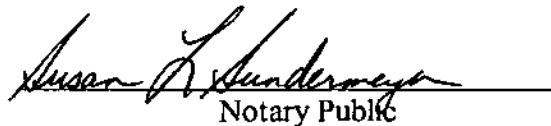
James C. Watkins, of lawful age, on oath states: that he has participated in the preparation of the foregoing Staff Recommendation; that he has knowledge of the matters set forth in such recommendation; and that such matters are true to the best of his knowledge and belief.



Subscribed and sworn to before me this 18th day of December, 2007.



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Caldway County
Commission #06942086


Notary Public

My commission expires 9-21-10