

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

AG PROCESSING INC A COOPERATIVE,	)	
Complainant,	)	
	)	
vs.	)	HC-2010-0235
	)	
KCP&L GREATER MISSOURI OPERATIONS	)	
COMPANY,	)	
Respondent.	)	

**AG PROCESSING INC A COOPERATIVE  
MOTION FOR APPROVAL OF RECONCILIATION**

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COMES NOW AG PROCESSING INC A COOPERATIVE ("AGP") and moves that the following reconciliation be approved and in support thereof states:

1. AGP incorporates herein as fully as though set out its Application for Rehearing and its Motion for Stay filed herein on even date.

2. Section 386.420.4 in relevant part provides:

In any proceeding resulting in the establishment of new rates for a public utility that is not classified as a price-cap or competitive company, the commission shall cause to be prepared, with the assistance of the parties to such proceeding, and shall approve, after allowing the parties a reasonable opportunity to provide written input, a detailed reconciliation containing the dollar value and rate or charge impact of each contested issue decided by the commission, and the customer class billing determinants used by the commission to calculate the rates and charges approved by the commission in such proceeding. Such information shall be sufficient to permit a reviewing court and the commission on remand from a reviewing court to determine how the public utility's rates and charges, including the rates and charges for each customer class, would need to be

temporarily and, if applicable, permanently adjusted to provide customers or the public utility with any monetary relief that may be due in accordance with the procedures set forth in section 386.520. In the event there is any dispute over the value of a particular issue or the correctness of a billing determinant, the commission shall also include in the reconciliation a quantification of the dollar value and rate or charge impact associated with the dispute.

3. Without prejudice to AGP's other contentions in the aforesaid Application for Rehearing and its Motion for Stay, AGP states that the Commission's Order Regarding Remand of February 27, 2013 would establish new rates for the GMO steam utility in the St. Joseph service territory. Accordingly, a reconciliation in the form that follows is submitted for approval pursuant to said statute.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

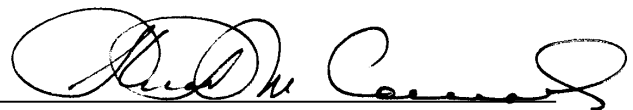


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ATTORNEYS FOR AG PROCESSING INC.

#### **SERVICE CERTIFICATE**

I certify that I have served a copy of the foregoing pleading upon identified representatives of the parties hereto per the EFIS listing maintained by the Secretary of the Commission by electronic means as an attachment to e-mail, all on the date shown below.



Stuart W. Conrad, an attorney for  
Ag Processing Inc a Cooperative

March 4, 2013

### **Suggested Reconciliation for Purposes of RSMO 386.420**

Costs Earlier Refunded to Steam Customers

For 2006           \$936,968

For 2007           \$1,953,488

Billing Determinants:

Billing determinants are not presently known.

Rate:

Also presently unknown based on the absence of billing determinants.

Note:

AGP files this Suggested Reconciliation solely to comply with Section 386.420 RSMo., for the purpose of filing a notice of appeal if needed, and to preserve its rights with respect to potential implementation of the Commission's order in this matter that was issued February, 27, 2013 and is made without prejudice to AGP's position that such charges should not be implemented and are, themselves, in excess of the mandate of the reviewing court and are unlawful.