

1. KCP&L appreciates the opportunity to continue the dialog concerning the use of short-term lenders as authorized pay stations. As noted in our prior comments, the Company believes authorized pay stations are a valuable customer service bill-payment option for our customers. The Company utilizes a third party to contract and retain utility pay stations/agents to provide geographical coverage; maintain an environment and business standard that reflects positively on KCP&L; and most importantly provides this needed customer service option for customers. KCP&L has utilized short-term lenders as authorized pay stations in a limited fashion, mainly when other options cannot be found. As authorized pay stations are engaged via contract, the Company has placed certain requirements on all its pay station agents to ensure customers are not placed at any disadvantage. Pay station agents are not permitted to require a “store purchase” for KCP&L customers to make a payment. The Company has specific language included in its pay station contract that the number of payday loan and check cashing locations shall be limited, and has the right to refuse any proposed agent.

2. KCP&L has reviewed the comments offered on this case and has heard the comments made during the July 10th workshop. There is no question that parties feel strongly about short-term lenders and their lending practices. However, concerning bill payment activity, no predatory behavior on the part of the short-term lenders has ever been reported to KCP&L. KCP&L has no knowledge of any written or verbal customer complaint specific to the check cashing services and/or payday loan services provided at authorized pay stations.

3. KCP&L wishes to note that its primary concern under this case is with the formation of additional rule language that does not provide any change or benefit to any of the parties. The issues raised by the parties will not be eliminated by prohibiting short-term lenders as authorized pay stations. If new rules are enacted, short-term lenders could continue to receive utility payments, acting instead as unauthorized pay stations and would then exist outside of any control by the utilities. Unfortunately, these efforts to enact rules before the Commission appear to be largely a symbolic effort to influence change to the principal statutes (Chapter 367) and regulations (20 CSR 1140, Chapter 5) covering the short-term lending industry and regulated by the Department of Insurance, Financial Institutions and Professional Registration through the Division of Finance.

4. KCP&L believes that new rules concerning the use of short-term lenders will not achieve the results many of the parties are seeking. Proposed rule language alternatives offered to this point do not appropriately address the mechanics of pay stations and exposes the utility to uncertainty, and risk of non-compliance. Additionally, any new rule creates a new burden of enforcement on the Commission and utilities; a burden requiring oversight of a pay agent's business practices, beyond the contracted function of accepting payments. However, the Company understands the issues offered and is sympathetic to the concerns. As a result of this

discussion, the Company will review its limited use of short-term lenders as authorized pay stations and verify that other alternatives are not available and to the extent possible relocate them to alternative sites.

WHEREFORE, the Company submits its comments in response to the Staff's July 10, 2014 request for additional comments following the workshop held on that same day.

Respectfully submitted,

/s/ Roger W. Steiner

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to all parties of record this 8th day of August, 2014.

/s/ Roger W. Steiner

Roger W. Steiner