

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

In the Matter of the Application of)	
Kansas City Power & Light Company for)	
a Modification of Order Granting)	File No. EA-2014-
Variance in Case No. EO-91-224 for Good)	
Cause Shown)	

**APPLICATION OF KANSAS CITY POWER & LIGHT COMPANY FOR
MODIFICATION OF ORDER**

COMES NOW Kansas City Power & Light Company (“KCP&L” or “Company”) and, pursuant to 4 CSR 240-2.060 requests the Commission modify its Order in Case No. EO-91-224, a copy of which is attached hereto as Exhibit A, for good cause shown as follows:

1. KCP&L is a Missouri corporation duly organized and existing under the laws of the State of Missouri, with its principal place of business located at 1200 Main Street, Kansas City, Missouri, 64105. It is engaged in the business of supplying electricity in parts of Missouri and Kansas pursuant to certificates of authority granted by the Commission. KCP&L’s Certificate of Good Standing was filed in Case No. EM-2000-753 and is incorporated herein by reference as allowed by 4 CSR 240-2.060(1)(G).

2. KCP&L has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or rates, which has occurred within three years of the date of this Application other than the following pending action: *SunSmart Technologies, LLC v. Kansas City Power & Light Company*, Case No. EC-2014-0039. In addition, no annual report or assessment fees are overdue.

3. In addition to serving counsel named below, all correspondence, pleadings, notices, orders, decisions, and communications regarding this proceeding should be sent to:

Lois J. Liechti
Senior Manager, Regulatory Affairs
Kansas City Power & Light Company
1200 Main Street
Kansas City, MO 64105
Phone: (816) 556-2612
lois.liechti@kcpl.com

4. KCP&L files this Application for a modification from the provision of the “Order Granting Variance” in Case No. EO-91-224 for the calendar years 2014-2016. The basis for the Application is described generally in the paragraphs which follow.

5. On December 3, 1990, KCP&L filed a verified application requesting a variance from 4 CSR 240-10.030(28). Under the resulting final order, KCP&L was permitted to use statistical procedures to establish the accuracy of its induction-type meters in lieu of strictly complying with 4 CSR 240-10.030(28). On May 7, 1991, the Commission granted the requested variance and required that KCP&L categorize the meters into homogeneous groups and randomly select a ten percent (10%) sample of each of the groups for testing. The Order set out procedures to be followed upon meeting or failing the prescribed criteria for accuracy.

6. As explained below, except for a period of approximately three years from August 1996 to January 2000, KCP&L has complied with the Order Granting Variance by carrying out its sampling plan for periodic testing of electric service watt-hour meters and by maintaining adequate and complete records of the meters tested in each homogeneous group, the test results of each homogeneous group, a summary of meters retired in each calendar year and any proposed retirements.

7. Similar to this request, on May 14, 1996, KCP&L filed an application in Case No. EO-96-386, requesting a variance from the testing requirements set out in the Commission’s

Order Granting Variance in Case No. EO-91-224. At that time, KCP&L was engaged in a project to implement an automated meter reading system referred to as “Cellnet”. As part of the Cellnet project, virtually all of KCP&L’s meters in the Kansas City metropolitan area were tested and changed out during the life of the project (1996-2000), making it unnecessary to conduct the testing set out in Case No. EO-91-224. The Commission approved that request on August 16, 1996. The Company resumed meter testing upon completion of the Cellnet project in early 2000 per the requirements set out in Case No. EO-91-224.

8. KCP&L finds itself in a similar situation today. The Cellnet meters are nearing the end of their useful life, and the Company has embarked on a project to replace the existing Cellnet meters. KCP&L is working with Landis+Gyr to replace KCP&L’s existing Cellnet meters in the metropolitan Kansas City area. New meters will utilize Landis+Gyr’s GridStream Advanced Metering Infrastructure (“AMI”) Network. The project is referred to as the “AMI Refresh”.

9. As part of the AMI Refresh project, virtually all of KCP&L’s meters in the Kansas City metropolitan area are being changed out during 2014-2016. The test parameters for all new meters are described in the following two paragraphs.

10. All new meters (light load and heavy load for single-phase meters, light load, heavy load and inductive load for polyphase meters) are to be calibrated as near to 100% as possible.

11. All new meters must be within the range of $\pm .2\%$ of 100%, or 99.8% to 100.2%.

12. In summary, KCP&L seeks to be relieved from complying with the requirements of the Order Granting Variance in Case No. EO-91-224 in 2014-2016, because virtually all

meters in service in the KCP&L Kansas City metropolitan area will be replaced within the period of 2014-2016.

13. If this requested modification is approved, KCP&L will return to compliance with the Order Granting Variance in Case No. EO-91-224 in 2017 and beyond.

14. In addition, throughout 2014-2016, KCP&L will comply with the other applicable portions of 4 CSR 240-10.030, including 4 CSR 240.10.030(29), requiring the testing of meters free of charge upon request of a consumer regardless of whether the modification is approved. KCP&L will continue to comply with the “Order Granting Variance” in Case No. EO-91-224 in all areas not included in the AMI Refresh Project.

15. KCP&L proposes to implement the change in testing procedures for the calendar years 2014-2016, and therefore requests the Commission approve this Application for modification effective as of January 1, 2014 through December 31, 2016.

16. While the Company does not know whether this filing is likely to become a contested case subject to the notice of filing requirement of 4 CSR 240-4.020(2), it requests a waiver of the notice requirement if applicable so that it may begin the AMI Refresh Project on January 1, 2014. Accordingly, should the Commission conclude that the filing of this Application is likely to be a contested case and subject to the notice of filing requirement of 4 CSR 240-4.020(2), the Company requests a waiver of the sixty day notice requirement for good cause shown pursuant to 4 CSR 240-4.020(2)(B).

WHEREFORE, for the reasons hereinabove stated, KCP&L requests that the Commission grant the modification herein described and requested and specify that the modification is effective as of January 1, 2014 through December 31, 2016.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MBN 39586
Kansas City Power & Light Company
1200 Main Street, 16th Floor
Kansas City, MO 64105
Telephone: (816) 556-2314
Facsimile: (816) 556-2787
email: roger.steiner@kcpl.com

ATTORNEY FOR
KANSAS CITY POWER & LIGHT COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on this 4th day of November, 2013 to the following:

General Counsel
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102-0360

Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102-2230

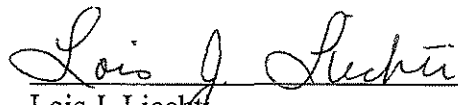
/s/ Roger W. Steiner

Roger W. Steiner

VERIFICATION

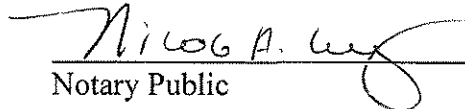
STATE OF MISSOURI)
)
COUNTY OF JACKSON) SS.

I, Lois J. Liechti, having been duly sworn upon my oath, state that I am Senior Manager, Regulatory Affairs of Kansas City Power & Light Company ("KCP&L"), that I am authorized to make this verification on behalf of KCP&L, and that the matters stated in the foregoing Application are true and correct to the best of my information, knowledge, and belief.



Lois J. Liechti
Senior Manager, Regulatory Affairs
Kansas City Power & Light Company

SUBSCRIBED AND SWORN TO before me this 4th day of November, 2013.



Notary Public

My Commission Expires: Feb 4 2015

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held at its office
in Jefferson City on the 26th
day of April, 1991.

In the matter of the application of Kansas City Power &)
Light Company for approval of alternative methodology) CASE NO. EO-91-224
for testing induction-type watthour meters.)

ORDER GRANTING VARIANCE

On December 3, 1990, Kansas City Power & Light Company (KCPL) filed a verified application requesting a variance from the Commission's rule, 4 CSR 240-10.030(28). On March 19, 1991, the Commission's Staff (Staff) filed a memorandum in this case recommending approval of the request for variance. The Commission determines that a hearing is unnecessary to determine the matters at issue in this case and will make a decision based upon KCPL's verified application and the recommendation of Staff.

The Commission's rule, 4 CSR 240-10.030(28) requires the periodic testing of each electric service watthour meter unless otherwise ordered by the Commission. This rule requires that induction-type meters manufactured during and since 1937 be tested at least once every 240 months (20 years) and older meters be tested more frequently. KCPL requests approval of a plan which would use statistical procedures to establish the accuracy of these meters.

Under this plan KCPL would categorize the meters into homogeneous groups and randomly select a ten percent sample of each of these groups for testing. If a sample should meet the prescribed criteria for accuracy KCPL would be able to infer at a 95 percent confidence level that no meter within that group would deviate more than two percent plus or minus from 100 percent accuracy. If a sample should fail to meet the prescribed criteria for accuracy, then the group from which that sample is selected would be tested in its entirety and adjusted or returned to the

manufacturer. These methods for testing accuracy are established by the American National Standards Institute in their code on electric metering.

In recommending approval of this request, Staff states that this sampling approach would allow KCPL to save money since less personnel would be needed to remove and test meters. Staff notes that KCPL presently tests 15,000 meters in Missouri annually and that the sampling approach would reduce the number of meters tested annually in Missouri to 3500. Staff further notes that other regulated utilities have used these sampling techniques for testing electric meters for a number of years. Staff recommends that the Commission require KCPL to maintain adequate and complete records of the meters tested in each homogeneous group, the number of meters making up the sample from each homogeneous group, the test results for each homogeneous group, a summary of meters retired in each calendar year and any proposed retirements.

Pursuant to the Commission's rule, 4 CSR 240-10.030(28) and based upon KCPL's verified application and the recommendation of Staff, the Commission finds that KCPL should be granted a variance as requested to establish the sampling plan outlined in this order. The Commission will adopt the recommendation of its Staff that KCPL be required to maintain records setting forth the information Staff suggests.

IT IS THEREFORE ORDERED:

1. That Kansas City Power & Light Company be granted hereby a variance from the provisions of the Commission's rule, 4 CSR 240-10.030(28), in order to carry out the sampling plan set forth herein to be used in the periodic testing of electric service watthour meters.

2. That Kansas City Power & Light Company be required hereby to maintain adequate and complete records of the meters tested in each homogeneous group, the number of meters making up the sample from each homogeneous group, the test results for each homogeneous group, a summary of meters retired in each calendar year and any proposed retirements.

3. That . hing in this order shall be coi dered as a finding by the Commission or the reasonableness of the expenditures herein involved. Furthermore, the Commission reserves the right to consider the ratemaking treatment to be afforded this program and its costs in any later proceeding.

4. That this order shall become effective on the 7th day of May, 1991.

BY THE COMMISSION

Brent Stewart

Brent Stewart
Executive Secretary

(S E A L)

Steinmeier, Chm., Mueller, Rauch,
McClure and Perkins, CC., Concur.

STATE OF MISSOURI .
OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original
on file in this office and I do hereby certify the same to
be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service
Commission, at Jefferson City, Missouri, this 26th
day of April, 1991.

Brent Stewart
Brent Stewart
Executive Secretary

EXHIBIT A