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

In the Matter of the Application of KCP&L	)	
Greater Missouri Operations Company for	)	Case No. ER-2010-0356
Approval to Make Certain Changes in its	)	
Charges for Electric Service.	)	

## REPLY OF KCP&L GREATER MISSOURI OPERATIONS COMPANY TO CLARIFICATION OF STAFF RESPONSE TO ORDER SUSPENDING TARIFF SHEETS AND DIRECTING FILING

KCP&L Greater Missouri Operations Company ("GMO" or "Company"), pursuant to 4 CSR 240-2.080, files its *Reply to the Clarification Of Staff Response To Order Suspending Tariff Sheets And Directing Filing* ("Staff's Clarification") filed on the evening of June 9, 2011. In support of its reply, the Company states as follows:

- 1. On June 9, 2011, the undersigned counsel received an EFIS notification of a filing of a "Clarification Of Staff Response To Order Suspending Tariff Sheets And Directing Filing." Counsel was able to obtain a copy of the Highly Confidential filing by accessing EFIS. Staff's Clarification indicates that "Based on what it currently know, Staff is unable to explain the 4.473% short-term borrowing rate GMO reported." (Staff's Clarification, p. 3)
- 2. On June 8, 2011, GMO provided to the Staff accountants located in Jefferson City a copy of the attached workpapers which support the Company's calculation of 4.473% short-term borrowing rate in its June 8, 2011 Response to Order Directing Filing. (Attachment No. 1) Staff did not contact the Company with any concerns or questions regarding the workpapers. Therefore, the Company does not understand Staff's statement that it currently does not know the basis of Company's calculation.
  - 3. The primary difference between the Company's calculation of the 4.473% short-

<sup>&</sup>lt;sup>1</sup> As of the time of the filing of the reply, counsel for GMO had not received any service from Staff of this pleading.

term borrowing costs and the Staff's recommended short-term rate relates to the differing time periods used in the weighted average calculation. The Staff used data throughout December 2010 while the Company used data through May 2011. The Company's weighted average includes an amortization of up front revolver fees and commitment fees necessary for borrowing capacity. These costs should be included because they are components of the total short-term borrowing costs.

**WHEREFORE**, KCP&L Greater Missouri Operations Company respectfully requests that the Commission accept this filing in reply to the *Staff's Clarification* which as filed on the evening of June 9, 2010.

Respectfully submitted,

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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, this 10th day of June, 2011, to all counsel of record.

/s/ James M. Fischer
James M. Fischer