

**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. EO-2014-0128
Variance in Case No. EO-91-224 for Good	)	
Cause Shown	)	

**KANSAS CITY POWER & LIGHT COMPANYS  
CLARIFICATION OF STAFF RECOMMENDATION**

COMES NOW Kansas City Power & Light Company (“KCP&L” or “Company”) and in response to the *Staff Recommendation to Approve Modification of Order Granting Variance* (“*Recommendation*”) filed December 4, 2013 states:

1. On November 4, 2013, KCP&L filed an *Application* in the captioned matter requesting a modification to the Commission *Order Granting Variance* in Case No. EO-91-224. This 1991 order set the parameters for testing meters by KCP&L. KCP&L seeks a variance from complying with this *Order Granting Variance* as it undertakes its AMI Refresh<sup>1</sup> project. As part of the AMI Refresh project, virtually all of KCP&L’s existing Cellnet meters in the metropolitan Kansas City area are being changed out during the 2014-2016 timeframe.

2. KCP&L appreciates the work of Staff in its *Recommendation* and agrees that the *Application* should be approved by the Commission. However, there are two statements in Staff’s counsel’s pleading which the Company believes need clarification. Page one of the *Recommendation*, numbered paragraph 1., states: “In this case KCP&L seeks to exempt **newly installed meters** from inclusion in the sampling during the three-year period in which they are installed, since the new meters are tested by the manufacturer and again by KCP&L before

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<sup>1</sup> New meters will utilize Landis+Gyr’s GridStream Advanced Metering Infrastructure (“AMI”) Network. The project is referred to as the “AMI Refresh”.

installation.” Also, on page two of the *Recommendation*, numbered paragraph 4., the *Recommendation* states: “During that time, from January 1, 2014 to December 31, 2016, KCP&L requests to be relieved from complying with the requirements of the Order in Case No. EO-91-224 **for those new meters.**” (emphasis added) Appendix A attached to Staff’s *Recommendation* does not limit the variance to new meters.

3. KCP&L’s *Application* request was intended to include all existing meters that are being replaced as well as newly installed meters. As stated in the November 6, 2013 *Order Directing Filing and Setting Intervention Deadline*, KCP&L “is requesting a two-year (later corrected to state “three-year”) suspension of the meter testing requirement in the Commission’s May 7, 1991 Order.”

4. Since the Company is seeking relief from complying with the requirements of the Order in Case No. EO-91-224 for all meters, it requests that the Commission adopt Staff’s *Recommendation* as outlined in Appendix A and state that the variance applies to all meters.

5. As it indicated in its *Application*, KCP&L will return to compliance with the Order Granting Variance in Case no. EO-91-224 in 2017 and beyond. KCP&L is not seeking a variance in any area of its service territory that is not included in the AMI Refresh project. In addition, throughout 2014-2016, KCP&L will continue to test meters free of charge upon the request of a customer.

WHEREFORE, KCP&L requests the Commission issue an order granting a variance from testing for all meters from January 1, 2014 through December 31, 2016 in the AMI Refresh project area.

Respectfully submitted,

/s/ Roger W. Steiner

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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 10<sup>th</sup> day of December, 2013 to the following:

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/s/ Roger W. Steiner

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