

**STATE OF MISSOURI
PUBLIC SERVICE COMMISSION**

At a session of the Public Service Commission held at its office in Jefferson City on the 28th day of September, 2016.

In the Matter of KCP&L Greater Missouri Operations) File No. ER-2016-0156
Company's Request for Authority to Implement a) Tracking Nos. YE-2016-0223
General Rate Increase for Electric Service) and JE-2017-0007

**ORDER APPROVING STIPULATIONS AND AGREEMENTS,
REJECTING TARIFFS, CANCELLING TRUE-UP HEARING,
AND ORDERING FILING OF COMPLIANCE TARIFFS**

Issue Date: September 28, 2016

Effective Date: October 8, 2016

The Commission is rejecting the tariff sheets ("tariffs")¹ as originally proposed by KCP&L Greater Missouri Operations Company ("GMO") and ordering GMO to file new tariffs in compliance with this order ("compliance tariffs"). The estimated comparison of the proposed tariffs and the compliance tariffs as ordered is as follows.

Tariffs	Return on Equity	Annual Revenue Increase
Proposed	9.9%	\$59.3 million
Ordered	9.5% to 9.75%	\$3.0 million

The estimated comparison of the effect of the proposed tariffs and the compliance tariffs as ordered on typical residential customers is as follows.

Current			Consolidated			
Service Area	Classifications	Monthly	Proposed		Ordered	
			%	Monthly	%	Monthly
MPS 900kWh	General Use	\$104.09	+8.1%	+\$9.00	+0.567%	+\$0.59
	Space Heating	\$130.65			+0.436%	+\$0.57
L&P 1,300kWh	General Use	\$104.12			+0.538%	+\$0.56
	Space Heating	\$131.35			-0.099%	-\$0.13

¹ As used in Commission practice, a tariff is a schedule governing rates and other terms of service. It may mean the whole set of such documents, or the subset for one subject matter, or a single page.

The Commission states its conclusions as follows.²

A. Procedure

The Commission has jurisdiction over GMO because GMO sells electricity at retail in Missouri. That activity brings GMO within the definition of a public utility³ and an electric corporation,⁴ which may conduct such business only as provided in tariffs on file with the Commission.⁵ The Commission has authority to determine the content of GMO's tariffs.⁶

On February 27, 2016, GMO filed tariffs bearing a proposed effective date of March 24, 2016, with an application⁷ that included a request to increase GMO's rates for service so as to generate \$59.3 million more in revenue—an 8.17% increase. Because GMO seeks an increase in rates, GMO has the burden of proof.⁸ The quantum of proof necessary is a preponderance of the evidence.⁹ Preponderance means greater weight in persuasive value:¹⁰ GMO must show that the evidence, and reasonable

² Section 386.420.2, RSMo Supp. 2013. The estimated numbers constitute projections, not rulings, based on the parties' on-the-record presentation and filings: Electronic Filing Information System ("EFIS") No. 305 (September 20, 2016) *Non-Unanimous Stipulation and Agreement*; EFIS No. 311 (September 26, 2016) *Typical Residential Customer Impact*; EFIS No. 312 (September 26, 2016) *Response of KCP&L Greater Missouri Operations Company*; EFIS No. 307 (September 21, 2016) *Notice and Order Scheduling an On-The-Record Presentation*.

³ Section 386.020(43), RSMo Supp. 2013.

⁴ Section 386.020(15), RSMo Supp. 2013.

⁵ Section 393.130.1, RSMo 2000 RSMo Supp. 2013.

⁶ Section 393.150, RSMo 2000. A tariff filed with the Commission may also take effect if the Commission makes no determination on it. Section 393.140(11), RSMo 2000.

⁷ EFIS No. 7.

⁸ Section 393.150, RSMo 2000.

⁹ *State Board of Nursing v. Berry*, 32 S.W.3d 638, 642 (Mo. App., W.D. 2000).

¹⁰ *State v. Davis*, 422 S.W.3d 458, 464 (Mo. App., E.D. 2014).

inferences from the evidence,¹¹ weighs more in favor¹² of GMO's position than against GMO's position.¹³

The statutes authorize the Commission to suspend the tariffs for the purpose of a "full" hearing before determining the provisions that will govern how GMO conducts business.¹⁴ The Commission suspended the tariffs until December 22, 2016,¹⁵ so that the Commission could conduct a hearing on the propriety of the tariffs. The Commission convened local public hearings in GMO's service territories.¹⁶ Staff filed a list of issues on behalf of all parties,¹⁷ and the parties filed position statements.¹⁸ The parties now seek the Commission's order in accordance with their stipulations and agreed settlements as follows.¹⁹

The Commission established the periods of time from which to draw the costs most probative to the tariffs' propriety from among the parties' suggestions as follows. An historic test year of the 12 months shows the amount that GMO spends to provide

¹¹ *Farnham v. Boone*, 431 S.W.2d 154 (Mo. 1968).

¹² *State Board of Nursing v. Berry*, 32 S.W.3d 638, 642 (Mo. App., W.D. 2000).

¹³ *Hager v. Director of Revenue*, 284 S.W.3d 192, 197 (Mo. App., S.D. 2009).

¹⁴ Section 393.150, RSMo 2000. A tariff filed with the Commission may also take effect if the Commission makes no determination on it. Section 393.140(11), RSMo 2000.

¹⁵ EFIS No. 33, (March 2, 2016) *Order Suspending Tariff, Notice of Contested Case, and Order Delegating Authority*.

¹⁶ EFIS No. 119 (May 11, 2016) *Notice and Order Setting Local Public Hearings*.

¹⁷ EFIS No. 277 (September 8, 2016) *List of Issues, Order of Witnesses, Order of Cross-Examination and Order of Opening Statements*.

¹⁸ The issues list and position statements set forth the parties' claims and defenses, like pleadings, to define the issues for hearing. The issues list and position statements appear late in the process because the parties cannot know any sooner which of the innumerable tariff provisions will be at issue until after extensive discovery and intensive discussion.

¹⁹ The requirement to determine GMO's rates and other terms of service by a pre-decision hearing signifies a contested case, which ordinarily requires the Commission to separately state the findings of fact on which its conclusions stand. But separately stated findings of fact are unnecessary in a contested case disposed of by stipulation, consent order, or agreed settlement. Section 536.090, RSMo 2000; *State ex rel. Aquila, Inc. v. Public Service Comm'n of State*, 326 S.W.3d 20, 28–29 (Mo. App., W.D. 2010).

safe and adequate service at just and reasonable rates. Those amounts are subject to change over time, so an update period shows the known and measurable changes to those amounts. Other items, which significantly affect rates but occurred after the test year within a “true-up,” bring the amount as up to date as reasonably possible.²⁰ The Commission also ordered any rate increase allocated evenly among customer classes as requested by the parties.²¹

The parties filed two documents proposing dispositions of the remaining issues: *Non-Unanimous Stipulation and Agreement Regarding Pensions and Other Post-Employment Benefits*²² and *Non-Unanimous Stipulation and Agreement*,²³ which they supplemented with supporting data²⁴ (collectively, the “settlement”). The Commission heard the parties’ evidence and argument describing the settlement on the record.²⁵ At that on-the-record presentation, no party objected to the Commission’s request that GMO file its report on time-of-use rates²⁶ when that report is complete.²⁷ Because no

²⁰ EFIS No. 57 (March 16, 2016) *Order Determining Test Year, Update, and True-Up; Order Regarding Schedule*.

²¹ EFIS No. 219 (August 19, 2016) *Order Approving Stipulation and Agreement, and Supplement, Related to Allocation of any Rate Increase*.

²² EFIS No. 306 (September 20, 2016).

²³ EFIS No. 308 (September 22, 2016) *Non-Unanimous Stipulation and Agreement Billing Determinants Incorporated by Reference*.

²⁴ EFIS No. 305 (September 20, 2016) *Non-Unanimous Stipulation and Agreement*; EFIS No. 311 (September 26, 2016) *Typical Residential Customer Impact*; EFIS No. 312 (September 26, 2016) *Response of KCP&L Greater Missouri Operations Company*.

²⁵ EFIS No. 307 (September 21, 2016) *Notice and Order Scheduling an On-The-Record Presentation*.

²⁶ EFIS No. 305 (September 20, 2016) *Non-Unanimous Stipulation and Agreement*, Section 12, page 10.

²⁷ The on-the-record presentation is available for viewing at <https://psc.mo.gov/Archive.aspx>. See 2:18:40 to 2:43:28; particularly 2:29:10 to 2:29:55, and 2:41:36 to 2:43:28.

party filed any opposition to the settlement within seven days, the settlement is deemed unanimous.²⁸

B. Standards of Law and Policy

The Commission's regulations describe this case as a general rate action.²⁹ At issue is the propriety of GMO's tariffs,³⁰ which means that the tariffs must provide safe and adequate service³¹ at just and reasonable rates.³² The General Assembly has instructed the Commission to construe the statutes "liberally . . . with a view to the public welfare, efficient facilities and substantial justice between patrons and public utilities."³³

The "just and reasonable" standard stands on constitutional provisions that protect the property interests of GMO.³⁴ The Commission must set rates that will pay enough to attract capital in the forms of debt and equity ("capital components"). All parties' expert witnesses on rates employed a collection of financial, accounting, or economic analyses known as cost-of-service rate-making, which the Commission is using in its determinations.

Cost-of-service rate-making determines GMO's rates by calculating GMO's revenue requirement.³⁵ The revenue requirement is how much it costs GMO, both capital items and expenses, to provide safe and adequate service plus returns sufficient

²⁸ 4 CSR 240-2.115(2)(B) and (C).

²⁹ 4 CSR 240-2.065(1).

³⁰ Section 393.150.1, RSMo 2000.

³¹ Section 393.130.1, RSMo Supp. 2013.

³² Section 393.130.1, RSMo Supp. 2013; and Section 393.150.2, RSMo 2000.

³³ Section 386.610, RSMo 2000.

³⁴ Bluefield Water Works & Improvement Co. v. Public Serv. Comm'n of the State of West Virginia, 262 U.S. 679, 690 (1923).

³⁵ Hope Natural Gas Co., 320 U.S. at 603 (1944).

to service debt and equity and continue attracting capital.³⁶ Revenue requirement includes operating expenses, and capital assets (“rate base”) and returns. The returns must be enough to continue attracting capital.³⁷ To help define just and reasonable rates, the Commission’s regulations incorporate the federal Uniform System of Accounts.³⁸

GMO’s rates must also be as “just and reasonable” to consumers as they are to the utility.³⁹ The balance of investor interests and consumer interests does not appear in any single judicial formula,⁴⁰ nor in any one statute, but in the pragmatic adjustments that are the Commission’s means to a just and reasonable end.⁴¹ The Commission must decide this action on consideration of “all facts which in its judgment have any bearing”⁴² (“all relevant factors”).⁴³ The Commission has made its determinations on consideration of all applicable arguments and relevant allegations.

C. Determinations

In the settlement, the signatories stipulate to entering the prepared testimony of the parties’ witnesses, which is already in the file, into the record. The Commission is entering those documents into the record. Based on that record, the Commission independently finds and concludes that the settlement’s substantive provisions support

³⁶ *Hope Natural Gas Co.*, 320 U.S. at 603 (1944).

³⁷ *Hope Natural Gas Co.*, 320 U.S. at 603 (1944).

³⁸ 4 CSR 240-20.030.

³⁹ *Valley Sewage Co. v. Public Service Comm’n*, 515 S.W.2d 845, 851 (Mo. App., K.C.D. 1974).

⁴⁰ *Hope Natural Gas Co.*, 320 U.S. at 586.

⁴¹ *Bluefield*, 262 U.S. at 692; *State ex rel. Associated Natural Gas Co. v. Public Serv. Comm’n*, 706 S.W.2d 870, 873 (Mo. App., W.D. 1985) (citing *Hope Natural Gas Co.*, 320 U.S. at 602-03).

⁴² Section 393.270.4, RSMo 2000.

⁴³ *State ex rel. Util. Consumers’ Council of Missouri, Inc. v. Pub. Serv. Comm’n*, 585 S.W.2d 41, 56 (Mo. banc 1979).

safe and adequate service at just and reasonable rates.⁴⁴ Therefore, the Commission incorporates the substantive provisions of the settlement into this order as if fully set forth. GMO shall file compliance tariffs that implement the provisions of the settlement.

In addition to complying with the provisions of the settlement, GMO shall file the report on time-of-use rates mentioned in the settlement as soon as it is completed, preferably no later than six months before GMO's next rate case is filed.

THE COMMISSION ORDERS THAT:

1. The parties' hearing exhibits are entered into the record.
2. The *Non-Unanimous Stipulation and Agreement Regarding Pensions and Other Post-Employment Benefits* and *Non-Unanimous Stipulation and Agreement* are approved.
3. The report on time-of-use rates, as described in the body of this order, shall be filed when completed.
4. The tariff sheets assigned Tracking Nos. YE-2016-0223 and JE-2017-0007 are rejected. The specific tariff sheets rejected are set forth in Appendix 1.
5. No later than November 8, 2016, KCP&L Greater Missouri Operations Company shall file new tariff sheets in compliance with this order.

⁴⁴ It was not clear from the "black box" settlement whether the parties reconciled their differences as to rate case expense. The Commission notes it continues to believe it is appropriate, in cases such as this one, for utility shareholders to share with customers the utility's cost of litigating rate cases. See *In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service and Midwest Energy Consumers' Group vs. Missouri Public Service Commission*, WD79125, (Mo. App. W.D. 2016),

6. This order shall be effective on October 8, 2016.



BY THE COMMISSION

A handwritten signature in black ink that reads "Morris L. Woodruff".

Morris L. Woodruff
Secretary

Hall, Chm., Stoll, Kenney, Rupp, and
Coleman, CC., concur;
and certify compliance with
Section 536.080, RSMo 2000.

Dated at Jefferson City, Missouri,
On this 28th day of September, 2016.

Appendix 1: Tariff Sheets Rejected

The tariff sheets rejected are:

P.S.C. MO. No. 1

6th	Revised Sheet No.	1	Canceling	5th	Revised Sheet No.	1
10th	Revised Sheet No.	2	Canceling	9th	Revised Sheet No.	2
7th	Revised Sheet No.	18	Canceling	6th	Revised Sheet No.	18
7th	Revised Sheet No.	19	Canceling	6th	Revised Sheet No.	19
7th	Revised Sheet No.	21	Canceling	6th	Revised Sheet No.	21
7th	Revised Sheet No.	22	Canceling	6th	Revised Sheet No.	22
7th	Revised Sheet No.	23	Canceling	6th	Revised Sheet No.	23
7th	Revised Sheet No.	24	Canceling	6th	Revised Sheet No.	24
7th	Revised Sheet No.	25	Canceling	6th	Revised Sheet No.	25
7th	Revised Sheet No.	28	Canceling	6th	Revised Sheet No.	28
7th	Revised Sheet No.	29	Canceling	6th	Revised Sheet No.	29
3rd	Revised Sheet No.	30	Canceling	2nd	Revised Sheet No.	30
7th	Revised Sheet No.	31	Canceling	6th	Revised Sheet No.	31
2nd	Revised Sheet No.	32	Canceling	1st	Revised Sheet No.	32
4th	Revised Sheet No.	33	Canceling	3rd	Revised Sheet No.	33
7th	Revised Sheet No.	34	Canceling	6th	Revised Sheet No.	34
7th	Revised Sheet No.	35	Canceling	6th	Revised Sheet No.	35
2nd	Revised Sheet No.	36	Canceling	1st	Revised Sheet No.	36
7th	Revised Sheet No.	43	Canceling	6th	Revised Sheet No.	43
7th	Revised Sheet No.	44	Canceling	6th	Revised Sheet No.	44
7th	Revised Sheet No.	50	Canceling	6th	Revised Sheet No.	50
6th	Revised Sheet No.	51	Canceling	5th	Revised Sheet No.	51
6th	Revised Sheet No.	52	Canceling	5th	Revised Sheet No.	52
6th	Revised Sheet No.	53	Canceling	5th	Revised Sheet No.	53
6th	Revised Sheet No.	54	Canceling	5th	Revised Sheet No.	54
4th	Revised Sheet No.	55	Canceling	3rd	Revised Sheet No.	55
6th	Revised Sheet No.	56	Canceling	5th	Revised Sheet No.	56
6th	Revised Sheet No.	57	Canceling	5th	Revised Sheet No.	57
2nd	Revised Sheet No.	58	Canceling	1st	Revised Sheet No.	58
6th	Revised Sheet No.	59	Canceling	5th	Revised Sheet No.	59
7th	Revised Sheet No.	60	Canceling	6th	Revised Sheet No.	60
7th	Revised Sheet No.	61	Canceling	6th	Revised Sheet No.	61
6th	Revised Sheet No.	66	Canceling	5th	Revised Sheet No.	66
6th	Revised Sheet No.	67	Canceling	5th	Revised Sheet No.	67
6th	Revised Sheet No.	68	Canceling	5th	Revised Sheet No.	68
3rd	Revised Sheet No.	69	Canceling	2nd	Revised Sheet No.	69
6th	Revised Sheet No.	70	Canceling	5th	Revised Sheet No.	70
6th	Revised Sheet No.	71	Canceling	5th	Revised Sheet No.	71
1 st	Revised Sheet No.	73	Canceling		Original Sheet No.	73
6th	Revised Sheet No.	74	Canceling	5th	Revised Sheet No.	74
1 st	Revised Sheet No.	75	Canceling		Original Sheet No.	75
6th	Revised Sheet No.	76	Canceling	5th	Revised Sheet No.	76
1 st	Revised Sheet No.	77	Canceling		Original Sheet No.	77
1st	Revised Sheet No.	78	Canceling		Original Sheet No.	78
6th	Revised Sheet No.	79	Canceling	5th	Revised Sheet No.	79
6th	Revised Sheet No.	80	Canceling	5th	Revised Sheet No.	80
1st	Revised Sheet No.	81	Canceling		Original Sheet No.	81
2nd	Revised Sheet No.	82	Canceling	1st	Revised Sheet No.	82
1st	Revised Sheet No.	96	Canceling		Original Sheet No.	96
5th	Revised Sheet No.	97	Canceling	4th	Revised Sheet No.	97
1st	Revised Sheet No.	97.1	Canceling		Original Sheet No.	97.1
1st	Revised Sheet No.	98	Canceling		Original Sheet No.	98
4th	Revised Sheet No.	99	Canceling	3rd	Revised Sheet No.	99

4th	Revised Sheet No.	100	Canceling	3rd	Revised Sheet No.	100
1st	Revised Sheet No.	101	Canceling		Original Sheet No.	101
7th	Revised Sheet No.	102	Canceling	6th	Revised Sheet No.	102
6th	Revised Sheet No.	103	Canceling	5th	Revised Sheet No.	103
6th	Revised Sheet No.	104	Canceling	5th	Revised Sheet No.	104
1st	Revised Sheet No.	105	Canceling		Original Sheet No.	105
1 st	Revised Sheet No.	106	Canceling		Original Sheet No.	106
1st	Revised Sheet No.	107	Canceling		Original Sheet No.	107
1st	Revised Sheet No.	108	Canceling		Original Sheet No.	108
6th	Revised Sheet No.	110	Canceling	5th	Revised Sheet No.	110
2 nd	Revised Sheet No.	110.1	Canceling	1 st	Revised Sheet No.	110.1
6th	Revised Sheet No.	111	Canceling	5th	Revised Sheet No.	111
5th	Revised Sheet No.	112	Canceling	4th	Revised Sheet No.	112
6th	Revised Sheet No.	113	Canceling	5th	Revised Sheet No.	113
5th	Revised Sheet No.	114	Canceling	4th	Revised Sheet No.	114
5th	Revised Sheet No.	115	Canceling	4th	Revised Sheet No.	115
3rd	Revised Sheet No.	116	Canceling	2nd	Revised Sheet No.	116
5th	Revised Sheet No.	117	Canceling	4th	Revised Sheet No.	117
3 rd	Revised Sheet No.	124	Canceling	2nd	Revised Sheet No.	124
3 rd	Revised Sheet No.	125	Canceling	2nd	Revised Sheet No.	125
3 rd	Revised Sheet No.	126	Canceling	2 nd	Revised Sheet No.	126
1st	Revised Sheet No.	126.1	Canceling		Original Sheet No.	126.1
1st	Revised Sheet No.	126.2	Canceling		Original Sheet No.	126.2
2 nd	Revised Sheet No.	127.1	Canceling	1st	Revised Sheet No.	127.1
2 nd	Revised Sheet No.	127.2	Canceling	1st	Revised Sheet No.	127.2
2 nd	Revised Sheet No.	127.3	Canceling	1 st	Revised Sheet No.	127.3
2 nd	Revised Sheet No.	127.4	Canceling	1 st	Revised Sheet No.	127.4
6 th	Revised Sheet No.	127.5	Canceling	5 th	Revised Sheet No.	127.5
2 nd	Revised Sheet No.	127.6	Canceling	1st	Revised Sheet No.	127.6
2 nd	Revised Sheet No.	127.7	Canceling	1 st	Revised Sheet No.	127.7
2 nd	Revised Sheet No.	127.8	Canceling	1st	Revised Sheet No.	127.8
2 nd	Revised Sheet No.	127.9	Canceling	1st	Revised Sheet No.	127.9
4 th	Revised Sheet No.	127.10	Canceling	3rd	Revised Sheet No.	127.10
	Original Sheet No.	140				
	Original Sheet No.	141				
	Original Sheet No.	142				
	Original Sheet No.	143				
	Original Sheet No.	144				
	Original Sheet No.	145				
	Original Sheet No.	146				
	Original Sheet No.	146.1				
	Original Sheet No.	146.2				
	Original Sheet No.	146.3				
	Original Sheet No.	146.4				
	Original Sheet No.	147				
	Original Sheet No.	147.1				
	Original Sheet No.	147.2				
	Original Sheet No.	147.3				
	Original Sheet No.	147.4				
	Original Sheet No.	147.5				
	Original Sheet No.	148				
	Original Sheet No.	148.1				
	Original Sheet No.	148.2				
	Original Sheet No.	148.3				
	Original Sheet No.	148.4				

Original Sheet No. 149
 Original Sheet No. 149.1
 Original Sheet No. 149.2
 Original Sheet No. 149.3
 Original Sheet No. 149.4
 Original Sheet No. 149.5
 Original Sheet No. 149.6

2nd	Revised Sheet No.	R-1	canceling	1 st	Revised Sheet No.	R-1
3rd	Revised Sheet No.	R-4	canceling	2 nd	Revised Sheet No.	R-4
3rd	Revised Sheet No.	R-5	canceling	2 nd	Revised Sheet No.	R-5
1st	Revised Sheet No.	R-6	canceling		Original Sheet No.	R-6
1st	Revised Sheet No.	R-7	canceling		Original Sheet No.	R-7
1st	Revised Sheet No.	R-10	canceling		Original Sheet No.	R-10
1st	Revised Sheet No.	R-13	canceling		Original Sheet No.	R-13
2nd	Revised Sheet No.	R-20	canceling	1 st	Revised Sheet No.	R-20
1st	Revised Sheet No.	R-21	canceling		Original Sheet No.	R-21
1st	Revised Sheet No.	R-32	canceling		Original Sheet No.	R-32
1st	Revised Sheet No.	R-33	canceling		Original Sheet No.	R-33
1st	Revised Sheet No.	R-35	canceling		Original Sheet No.	R-35
1st	Revised Sheet No.	R-38	canceling		Original Sheet No.	R-38
1st	Revised Sheet No.	R-47	canceling		Original Sheet No.	R-47
1st	Revised Sheet No.	R-49	canceling		Original Sheet No.	R-49
1st	Revised Sheet No.	R-50	canceling		Original Sheet No.	R-50
1st	Revised Sheet No.	R-51	canceling		Original Sheet No.	R-51
1st	Revised Sheet No.	R-52	canceling		Original Sheet No.	R-52
1st	Revised Sheet No.	R-53	canceling		Original Sheet No.	R-53
2nd	Revised Sheet No.	R-54	canceling	1 st	Revised Sheet No.	R-54
3rd	Revised Sheet No.	R-62.15	canceling	2 nd	Revised Sheet No.	R-62.15
1 st	Revised Sheet No.	R-62.16	canceling		Original Sheet No.	R-62.16
1st	Revised Sheet No.	R-62.17	canceling		Revised Sheet No.	R-62.17
1st	Revised Sheet No.	R-62.18	canceling		Original Sheet No.	R-62.18
3rd	Revised Sheet No.	R-66	canceling	2 nd	Revised Sheet No.	R-66
1st	Revised Sheet No.	R-67	canceling		Original Sheet No.	R-67

Original Sheet No. R-32.1
 Original Sheet No. R-33.1

Appendix 2: Appearances

For:	Appearing:
KCP&L Greater Missouri Operations Company	James M Fischer Larry W Dority 101 Madison Street, Suite 400 Jefferson City MO 35101
	Karl Zobrist Joshua Harden 4520 Main Street, Suite 1100 Kansas City MO 64111
	Robert Hack Roger W Steiner P.O. Box 418679 1200 Main, 19th Floor Kansas City MO 64141-9679
Staff of the Missouri Public Service Commission	Kevin A. Thompson Nathan Williams Bob Berlin Mark Johnson Nicole Mers Marcie Forck Whitney Payne Casi Aslin P.O. Box 360 200 Madison Street, Suite 800 Jefferson City MO 65102
Office of the Public Counsel	James Owen Cydney Mayfield 200 Madison Street, Suite 650 Jefferson City MO 65102
Brightergy, LLC	Andrew Zellers 1712 Main Street, 6th Floor Kansas City MO 64108
City of Kansas City, Missouri	Mark W Comley 601 Monroe Street, Suite 301 Jefferson City MO 65102-0537
City of St. Joseph, Missouri	William D Steinmeier P.O. Box 104595 2031 Tower Drive Jefferson City MO 65110-4595
Dogwood Energy, LLC	Carl J Lumley 130 S. Bemiston, Ste 200 St. Louis MO 63105

IBEW Local Union 1464 IBEW Local Union 1613 IBEW Local Union 412	Michael E Amash Jon R Dedon 753 State Ave, Suite 475 Kansas City KS 66101
Midwest Energy Consumers Group	David Woodsmall 807 Winston Court Jefferson City MO 65101
Missouri Division of Energy	Alexander Antal P.O. Box 1157 301 West High St. Jefferson City MO 65102
Missouri Industrial Energy Consumers	Edward F Downey 221 Bolivar Street, Suite 101 Jefferson City MO 65101
	Diana M Vuylsteke 211 N. Broadway, Suite 3600 St. Louis MO 63102
Earth Island Institute d/b/a Renew Missouri	Henry B Robertson 319 N. Fourth St., Suite 800 St. Louis MO 63102
	Andrew J Linhares 1200 Rogers St, Ste B Columbia MO 65201-4744
Union Electric Company	James B Lowery P.O. Box 918 111 South Ninth St., Suite 200 Columbia MO 65205-0918
	Wendy Tatro 1901 Chouteau Avenue St. Louis MO 63103-6149

Daniel Jordan, Senior Regulatory Law Judge