

**THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Received
on

Before Commissioners: Chairman Mark Sievers
Thomas E. Wright
Shari Feist Albrecht

NOV 16 2012

by
State Corporation Commission
of Kansas

In the Matter of Annual Compliance Filings by)
Electric Utilities for the Kansas Generation)
Planning Survey, Pursuant to K.S.A. 2011 Supp.)
66-1282, and as Required by Commission Order)
In Docket No. 99-GIME-321-GIE)

Docket No. 13-GIME-256-CPL

PETITION FOR RECONSIDERATION

COMES NOW the Kansas City Kansas Board of Public Utilities (“KCK BPU”) and submits this Petition for Reconsideration of that portion of the Order Assessing Costs in the above docket that assesses costs against KCK BPU. In support of the Petition for Reconsideration, KCK BPU states:


1. KCK BPU is an administrative agency of the Unified Government of Wyandotte County/Kansas City, Kansas (the “Unified Government”) charged with the responsibility for the daily management, operation, maintenance and control of the Unified Government’s water and electric facilities. KCK BPU provides electric service within the corporate limits of the City of Kansas City, Kansas, not beyond the corporate limits of the City of Kansas City, Kansas. KCK BPU does not provide electric service more than three (3) miles from the corporate limits of the City of Kansas City, Kansas. KCK BPU is not a public utility within the meaning of K.S.A. 66-104(b).

2. KCK BPU has received the Commission’s Order Assessing Costs in the above docket for the investigation regarding electric supply and demand for all electric utilities in

Kansas, pursuant to the Commission Order dated October 25, 2012 in Docket No. 99-GIME-321-GIE.

3. The Order Assessing Costs in the above docket noted that K.S.A. 66-1502 authorizes the Commission to assess the expenses of an investigation against public utilities (emphasis supplied). K.S.A. 66-1502 does not authorize the Commission to assess costs against entities that are not public utilities in such matters such as the investigation described in Docket 99-GIME-321-GIE. Inasmuch as KCK BPU is not a public utility, K.S.A. 66-1502 does not authorize the Commission to assess costs against KCK BPU in the above docket in connection with the investigation described in Docket 99-GIME-321-GIE. (KCK BPU does not object to providing information to the Commission pursuant to the Commission Order dated October 25, 2012 in Docket No. 99-GIME-321-GIE, only to the assessment of costs against KCK BPU in the above docket.)

WHEREFORE, the Kansas City, Kansas Board of Public Utilities requests the Commission reconsider the portion of the Order Assessing Costs that assesses costs against the Kansas City, Kansas Board of Public Utilities and that the Commission determine that the costs of the proceeding should not be assessed against the Kansas City, Kansas Board of Public Utilities, and for such other relief as the Commission may deem appropriate.



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CERTIFICATE OF SERVICE

13-GIME-256-CPL

I hereby certify that a true and correct copy of the foregoing Petition for Reconsideration was deposited in the United States Mail, postage prepaid, this 16th day of November, 2012, addressed to:

Kelly S. Walters, Regulatory & General Services
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Kansas City Board of Public Utilities
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(Note substitution of Joseph Jarsulic rather than Blake Elliott for service to KCK BPU)

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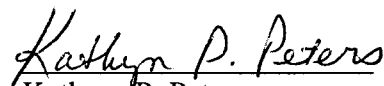
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NOV 19 2012

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November 16, 2012

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Kansas Corporation Commission
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by
State Corporation Commission
of Kansas

**Re: Petition for Reconsideration/Kansas City, Kansas Board of Public
Utilities/Docket No. 13-GIME-256-CPL**

Dear Sir or Madam:

Enclosed please find originally executed Petition for Reconsideration, along with seven copies of said Petition.

If you have any questions, please don't hesitate to call me.

Sincerely,


Kathryn P. Peters

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Enclosures