

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Received
on

MAY 02 2012

In the Matter of the Application of Kansas)
City Power and Light Company for an Order)
Authorizing Its Plan to Reorganize Itself)
into a Holding Company Structure)

by
State Corporation Commission
of Kansas

Docket No. 01-KCPE-708-MIS

MOTION OF KANSAS CITY POWER & LIGHT COMPANY

COMES NOW Kansas City Power & Light Company ("KCP&L" or the "Company") and hereby requests an Order from the Kansas Corporation Commission ("Commission") terminating certain financial reporting requirements defined in paragraph 1 below.

1. In Docket No. 01-KCPE-708-MIS, *In the Matter of the Application of Kansas City Power & Light Company for an Order Authorizing Its Plan to Reorganize Itself into a Holding Company Structure*, (the "708 Docket"), the following financial reporting requirements were established in a Unanimous Stipulation and Agreement for KCP&L:

Reports:

KCPL shall submit quarterly to the Staff of the Commission certain key financial ratios as defined by Standard and Poor's Credit Rating Service, as follows:

- (a) Pre-tax interest coverage;
- (b) After-tax coverage of interest and preferred dividends;
- (c) Funds flow interest coverage;
- (d) Funds from operations to total debt;
- (e) Total debt to total capital (including preferred); and
- (f) Total common equity to total capital.¹

The Commission approved the Stipulation and Agreement in the 708 Docket by Order issued August 7, 2001.² KCP&L began filing the required financial information on April 3, 2002.³

2. These financial reporting requirements were redefined in Docket No. 04-KCPE-1025-GIE, *In the Matter of the Future Supply, Delivery and Pricing of the Electric Service Provided by Kansas City Power & Light*, (the “1025 Docket”) as follows:

- (1) Total Debt to Total Capitalization;
- (2) Funds From Operations Interest Coverage; and
- (3) Funds From Operations as a % of Average Total Debt.⁴

The Commission approved the Stipulation and Agreement in the 1025 Docket (the “1025 S&A”) by Order issued August 5, 2005.⁵

3. In December 2005, KCP&L began submitting its key financial ratios on a quarterly basis in both the 708 Docket and the 1025 Docket. KCP&L recently discontinued submission of these quarterly reports in the 1025 Docket when the Commission closed this docket after the 1025 S&A expired. KCP&L has continued quarterly submission of these reports to date in the 708 Docket.

4. In December 2010, in Docket No. 06-GIMX-181-GIV, *In the Matter of the Investigation of Affiliate and Ring-Fencing Rules Applicable to all Kansas Electric and Gas Public Utilities*, (the “181 Docket”), the Commission issued an Order adopting the procedure developed by Staff in conjunction with the utilities for reporting certain financial information.

¹ See Docket No. 01-KCPE-708-MIS, Unanimous Stipulation & Agreement, at pp. 11-12, Section II(B)(7)(F)(5), filed April 30, 2001, and Amended Stipulation & Agreement, at pp. 11-12, Section(B)(7)(F)(5), filed August 21, 2001.

² See Docket No. 01-KCPE-708-MIS, Order Approving Unanimous Stipulation and Agreement and Authorizing Reorganization issued August 7, 2001.

³ See Docket No. 01-KCPE-708-MIS, KCPL’s Key Financial Ratios for the Periods Ended September 30, 2001 and December 31, 2001 as Required by First Amended Stipulation and Agreement and Commission Order Dated August 8, 2001 filed April 3, 2002.

⁴ See Docket No. 04-KCPE-1025-GIE, KCPL’s, KCC Staff’s, Sprint’s and Kansas Hospital Assn.’s Joint Motion to Approve Stipulation and Agreement, at pp. 7-8 and Appendix E, filed April 27, 2005.

⁵ See Docket No. 04-KCPE-1025-GIE, Order Approving Stipulation and Agreement, issued August 5, 2005.

The financial reporting requirements established in the 181 Docket are comprehensive.⁶ KCP&L will continue to comply with the reporting requirements under the 181 Docket.

5. After an inquiry from KCP&L, regarding the upcoming quarterly submission, Staff notified KCP&L on March 27, 2012 that it believed these quarterly reporting requirements in the 708 Docket were duplicative of the reporting requirements outlined in the 181 Docket and thus were no longer needed.

WHEREFORE, KCP&L respectfully requests the Commission issue an Order in this docket terminating the quarterly key financial reporting requirements established in the 708 Docket for the reasons set forth above.

Respectfully submitted,



Denise M. Buffington (#24850)
Corporate Counsel
Kansas City Power & Light Company
1200 Main Street – 16th Floor
Kansas City, Missouri 64105
Telephone: (816) 556-2683
Facsimile: (816) 556-2787
Denise.Buffington@kcpl.com

COUNSEL FOR
KANSAS CITY POWER & LIGHT COMPANY

⁶ See Docket No. 06-GIMX-181-GIV, Order Adopting Report of the Commission Staff and Active Participating Utilities issued December 3, 2010 and Report of the Commission Staff and the Active Participating Utilities, filed October 27, 2010 also in the 181 Docket.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing has been mailed, First Class mail, postage prepaid, this 19th day of May, 2012 to all counsel of record.



Denise M. Buffington



WRITER'S DIRECT DIAL:

☎ (816) 556-2683

Facsimile: (816) 556-2787

May 1, 2012

Received
on

MAY 02 2012

Ms. Patti Petersen-Klein
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604

by
State Corporation Commission
of Kansas

*Re: In the Matter of the Application of Kansas City Power & Light Company for an
Order Authorizing Its Plan to Reorganize Itself into a Holding Company
Structure
Docket No. 01-KCPE-708-MIS*

Dear Ms. Petersen-Klein:

Please accept for filing the original and eight (8) copies of Kansas City Power & Light Company's Motion in the above-captioned matter. Please file-stamp the extra copy of the aforementioned included for that purpose, then return in the enclosed self-addressed, stamped envelope. Thank you for your assistance and attention to this matter.

Respectfully submitted,

Denise M. Buffington
Corporate Counsel

DMB/naw/enclosures