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September 15, 2014

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: *Kansas City Power & Light and KCP&L Greater Missouri Operations*
Docket No. ER14- -000
Compliance Filing Revising Formula Rate Protocols in Response to
Docket Nos. EL14-74-000 & EL14-75-000

Dear Secretary Bose:

Pursuant to the Federal Energy Regulatory Commission's ("Commission" or "FERC") July 17, 2014 Order on Formula Rate Protocols,¹ Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO"), referenced together as KCP&L/GMO, hereby submit revisions to their formula rate protocols addressing (1) the scope of participation in Information Exchanges surrounding annual rate updates; (2) the transparency of the information exchanged; and (3) the ability to challenge a Transmission Owner's implementation of its formula rate. KCP&L/GMO request an effective date of March 1, 2015, for the revisions proposed in this filing.

I. COMPLIANCE FILING

A. Overview of Filing

KCP&L/GMO are submitting revised formula rate protocols to comply with the requirements imposed in the July 17 Order. The revised protocols contained in today's filing provide detailed and enhanced procedures for participation by Interested Parties,² transparency and information exchange, and modified Informal Challenge procedures that comply with the requirements of the July 17 Order. KCP&L/GMO have developed the revised protocols based

¹ *Kansas City Power & Light Co. and KCP&L Greater Missouri Operations Co.*, 148 FERC ¶ 61,034 (2014) ("July 17 Order").

² Capitalized terms not defined herein are defined in the revised protocols begin submitted herein or in the Tariff.

on language taken directly from the July 17 Order or from the MISO Transmission Owners protocols, which have been conditionally accepted by the Commission and are referenced in the July 17 Order, with one exception. As explained in more detail below, the requirement to hold joint meetings with other SPP Transmission Owners to discuss transmission projects that utilize regional cost allocation is not feasible at this time as SPP Transmission Owners are not similarly situated with the MISO Transmission Owners because they do not share a uniform formula rate or protocols.

Both KCP&L's and GMO's formula rate protocols are part of the Southwest Power Pool, Inc.'s ("SPP") Open Access Transmission Tariff ("SPP Tariff"). Notably, GMO's formula rate protocols also are part of GMO's Open Access Transmission Tariff ("GMO Tariff").³ As part of this filing GMO will be submitting the required eTariff revisions. SPP, however, will make a companion filing to incorporate the revised protocols for KCP&L/GMO into the SPP Tariff upon Commission approval of this compliance filing.

A detailed description and explanation of the revised protocols follows.

B. Scope of Participation

In the July 17 Order, the Commission directed KCP&L/GMO "to revise their formula rate protocols to provide all interested parties and the Commission access to information regarding annual updates as provided by the MISO Investigation Order and the MISO Compliance Order."⁴ The Commission expresses concern that the KCP&L/GMO protocols limit participation to "only KCP&L/GMO's transmission customers and 'designated' Missouri Commission and Kansas Commission staff."⁵ Further, the Commission stated that while "interested parties" are allowed to submit information requests and participate in the challenge procedures, KCP&L/GMO protocols "do not define the term 'interested parties' to identify what parties can participate."⁶ To address this concern, KCP&L/GMO have adopted the definition of "Interested Parties" accepted by the Commission in the MISO Compliance Order.⁷ Specifically, the term "Interested Party" "includes, but is not limited to, customers under the OATT, state utility regulatory commissions, consumer advocacy agencies, and state attorneys general."⁸ As described below, Interested Parties have the right to participate in the open Annual Update and

³ Specifically, KCP&L's formula rate and formula rate protocols are only included in the SPP Tariff, GMO's formula rate and formula rate protocols are included in the GMO Tariff and the SPP Tariff. Notably, the protocols for both entities, in both tariffs, are identical, thus we cite generically to the protocol provisions without identifying the entity or the tariff.

⁴ July 17 Order at P 16 (citing *Midwest Independent Transmission System Operator, Inc.*, 146 FERC ¶ 61,212 at P 18) (2014) ("MISO Compliance Order").

⁵ *Id.* at P 15.

⁶ *Id.*

⁷ MISO Compliance Order at P 18 (finding MISO's definition of interested parties as "all interested parties in information exchange and review processes, including but not exclusive to customers under the [MISO] Tariff, state utility regulatory commissions, consumer advocacy agencies, and state attorney[s] general" just and reasonable).

⁸ KCP&L/GMO Revised Protocols § I.3.f

True-Up Adjustment Customer Meetings, submit information requests, and make Informal and Formal Challenges.

C. Transparency

In the July 17 Order, the Commission directed KCP&L/GMO “to provide interested parties the information necessary to understand and evaluate the implementation of the formula rate for both the correctness of inputs and calculations, and the reasonableness and prudence of the costs to be recovered in the formula rate, as provided by the MISO Investigation Order and MISO Compliance Order.”⁹ The Commission noted that KCP&L/GMO currently post their Annual Updates and True-Up Adjustments in an accessible location on KCP&L/GMO’s and SPP’s OASIS websites. The Commission recently revised its standard, however, to require transmission owners “to post their revenue requirements and relevant information on both the RTO’s website and OASIS to ensure accessibility to all interested parties.”¹⁰ To address this concern, the revised protocols require KCP&L/GMO to post their annual updates and true-up adjustments on the SPP website and OASIS.¹¹ SPP provides a link to the OASIS site on the top of its homepage. This link goes directly to the OASIS site where the KCP&L and GMO information is located.

Also, in an effort to be consistent with the Commission’s directive in its MISO Compliance Order, KCP&L/GMO have revised their protocols to provide that “any delay in the publication date should result in an equivalent extension of time for submission of information requests.”¹²

In addition, the Commission directed KCP&L/GMO to “propose, in their compliance filing, a process for KCP&L/GMO to endeavor to coordinate with other transmission owners that use a regional cost sharing mechanism and hold joint meetings to enable all interested parties to understand how KCP&L/GMO and the other transmission owners are implementing their formula rates to recover the costs of projects subject to such regional cost sharing.”¹³ The Commission acknowledges that “other SPP transmission owners’ formula rate protocols may not require such efforts. In such instances, cooperation of such SPP transmission owners would be necessary” to provide for joint meetings.¹⁴ Nevertheless, the Commission finds that “this type of process will ease the burden of both transmission customers and owners by limiting the number of annual meetings necessary” and directed KCP&L/GMO to insert similar protocol language consistent with its findings in the MISO Compliance Order.¹⁵

⁹ July 17 Order at P 25.

¹⁰ *Midwest Independent Transmission System Operator, Inc.*, 143 FERC ¶ 61,149 at P 21 (2013) (“MISO Investigation Order”).

¹¹ KCP&L/GMO Revised Protocols § I.3.e.

¹² *Id.*

¹³ July 17 Order at P 22.

¹⁴ *Id.* at n.40.

¹⁵ *Id.* at P 22.

The SPP transmission owners, such as KCP&L/GMO, however, do not have a standard formula rate template and protocols like the MISO Transmission Owners. Rather, each SPP transmission owner has its own unique formula rate template and protocols, including distinct times for postings, customer meetings and review periods. Based on our review of other SPP transmission owners' protocols, none of them require a joint meeting. Consequently, there currently is no common provision that would allow KCP&L/GMO to coordinate holding such joint meetings without engaging each transmission owner in establishing a new process. KCP&L/GMO therefore submit this requirement should not be included in its revised protocols at this time.

Further, the Commission required "KCP&L/GMO to notify any interested party, through an email distribution list, of its postings related to the annual updates and, if appropriate, true-up adjustments."¹⁶ The Commission referenced "an email 'exploder' list" it directed MISO to utilize to accomplish this notification in its MISO Compliance Order.¹⁷ Consistent with these requirements, KCP&L/GMO will notify any Interested Party, through an email distribution list, of its posting related to the Annual Updates and True-Up Adjustments.¹⁸ Such distribution will utilize the SPP Service List so any Interested Party can sign up for to receive notice of related postings and meetings. The SPP Service List includes all Members, Customers and Market Participants on the SPP exploder Service List.

Lastly, the Commission stated that "information such as the annual updates, true-up adjustments, and data and workpapers sufficiently detailed to support such information must be filed [by KCPL/GMO] with the Commission in the form of an annual informational filing."¹⁹ In describing what was required for MISO Transmission Owners, the Commission found that "the MISO formula rate protocols must specifically provide that the informational filing include the information that is reasonably necessary to determine: (1) that input data under the formula rate is properly recorded in any underlying workpapers; (2) that the transmission owner has properly applied the formula rate and the procedures in the protocols; (3) the accuracy of data and the consistency with the formula rate of the actual revenue requirement and rates (including any true-up adjustment) under review; (4) the extent of accounting changes that affect formula rate inputs; and (5) the reasonableness of projected costs included in the projected capital addition expenditures (for forward-looking formula rates)."²⁰

Section IV of the revised protocols adopts informational filing procedures consistent with the Commission's annual informational filing directive. The revised protocols state the Informational Filing will be submitted in separate dockets by KCP&L and GMO by March 15 of the year after the end of the period allowed for Informal and Formal Challenges.²¹ The KCP&L/GMO revised protocols also adopt language referenced in the July 17 Order requiring

¹⁶ *Id.* at P 23.

¹⁷ *Id.*

¹⁸ KCP&L/GMO Revised Protocols § I.3.f.

¹⁹ July 17 Order at P 24.

²⁰ *Id.* at P 19 (citing MISO Investigation Order, 143 FERC ¶ 61,149 at P 92).

²¹ KCP&L/GMO Revised Protocols § IV.1.

KCP&L/GMO to describe all aspects of the formula rate or its inputs as described above.²² Consistent with the Commission's prior orders, these updates will not be noticed, and any challenges to the implementation of the formula rate must be made through the applicable challenge procedures or in a separate complaint proceeding, and not in response to an informational filing.²³

D. Challenge Procedures

The Commission also directed KCP&L/GMO to "revise their formula rate protocols to provide specific procedures for challenges, ... sufficient to ensure that transmission customers pay just and reasonable rates as provided by the MISO Investigation Order and MISO Compliance Order."²⁴ Specifically, the Commission identified that the "informal challenge provisions within the KCP&L/GMO formula rate protocols appear to be applicable only to disputes related to true-up adjustments, and therefore may not be sufficient to allow interested parties to resolve any other disputes related to the implementation of the KCP&L/GMO formula rates as provided by the MISO Investigation Order."²⁵

Section II and Section III of the KCP&L/GMO protocols have been revised to comply with this directive by clarifying that the challenge procedures apply to both the Annual Update as well as the True-Up Adjustment process.²⁶ In addition, the revised protocols remove language that requires formal challenges to be complaints filed pursuant to section 206 or 306 of the FPA.²⁷ These provisions are consistent with the purpose of the protocols, which is to allow challenges to implementation of the formula rate rather than to the formula rate itself, which is the filed rate.²⁸

Additionally, the word "Issues" used in Sections II and III of the Protocols has been changed to the phrase "Informal Challenges" to help clarify the process set forth for Informal Challenges.

The revised protocols also specify the manner and procedures for submitting information requests, based on Commission-approved protocols in other regions. Specifically, the protocol language has been modified to allow Interested Parties to raise all issues that may be necessary to determine (1) the extent or effect of an Accounting Change; (2) whether the Annual Update or Annual True-Up fails to include data properly recorded in accordance with the protocols; (3) the proper application of the formula rate and

²² *Id.*

²³ MISO Investigation Order at P 120 n.200; *see also id.* at PP 85, 92 n.142.

²⁴ July 17 Order at P 29.

²⁵ *Id.* at P 28.

²⁶ KCP&L/GMO Revised Protocols §§ II and III.

²⁷ *Id.* at § III.2.a.

²⁸ *See* MISO Investigation Order at P 82; *see also id.* at P 120 n.198 (stating that when the Commission approves a formula rate, it becomes the filed rate).

procedures in the protocols; (4) the accuracy of data and consistency with the formula rate of the charges shown in the Annual Update; (5) the prudence of actual costs and expenditures; and (6) the effect of any change to the underlying Uniform System of Accounts or the Applicable Form; and any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the formula.²⁹ These provisions will allow an Interested Party to challenge the inputs to the Annual Update or True-Up Adjustment, including the supporting material, without unnecessarily requiring KCP&L/GMO to provide information that is not relevant to the Annual Update or True-Up Adjustment. Thus, these provisions establish a robust procedure for Interested Parties to have information requests and challenge the Annual Update or True-Up Adjustment and are consistent with the July 17 Order.³⁰

II. REQUESTED EFFECTIVE DATE AND REQUEST FOR WAIVER

Pursuant to Section 35.11³¹ of the Commission's regulations, KCP&L/GMO respectfully request waiver of the notice requirements in Section 35.3 to allow the revised protocols to become effective March 1, 2015. If the Commission issues an order on this filing within sixty days of this filing, the Posting Date for KCP&L/GMO's next Annual Update under the revised protocols [September 24, 2014], would have already passed. Because the procedural schedules in the revised protocols are tied to the Posting Date (i.e., the date on which KCP&L/GMO post their Annual Updates), the procedural time periods and deadlines under the revised protocols would be curtailed and difficult to implement. A March 1, 2015 effective date will allow the revised protocols to be applicable to the first subsequent Informational Filing, which will be made on March 15, 2015.

III. MATERIAL INCLUDED WITH FILING

In addition to the transmittal letter, the following material is included in this filing:

Exhibit I – revised GMO protocols in clean format;

Exhibit II – revised GMO protocols in redline format;

Exhibit III – revised KCP&L protocols in clean format; and

Exhibit IV – revised KCP&L protocols in redline format.

²⁹ KCP&L/GMO Revised Protocols § II.3; *see also* July 17 Order at n.49.

³⁰ July 17 Order at P 28.

³¹ 18 C.F.R. § 35.11.

IV. COMMUNICATIONS

KCP&L/GMO request that all communications regarding this filing be directed to the following:

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V. SERVICE

KCP&L/GMO have served a copy of this filing electronically, including attachments, upon all parties listed on the Commission's service list for Dockets No. EL14-74-000 and EL14-75-000, as well as the existing notification listing currently utilized for the KCP&L and GMO transmission formula rate communications. In addition, this filing has been posted electronically on SPP's website and OASIS.

VI. CONCLUSION

For the reasons stated above, KCP&L/GMO request that the Commission accept these revised formula rate protocols as being in compliance with the July 17 Order, to be effective March 1, 2015, without modification or condition.

Respectfully submitted,

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Counsel for KCP&L/GMO

Exhibit I
(GMO Clean Protocols)

KCP&L Greater Missouri Operations Company
Formula Rate Implementation Protocols

I. Annual Update

1. The formula rate template contained in Attachment H of the Southwest Power Pool, Inc. ("SPP") Open Access Transmission Tariff ("OATT"), Federal Energy Regulatory Commission ("FERC") Electric Tariff, Sixth Revised Volume No. 1 ("Formula") and these Formula Rate Implementation Protocols ("Protocols") together comprise the KCP&L Greater Missouri Operations ("GMO") filed rate (collectively, the "Formula Rate") for transmission service under the SPP OATT or the GMO OATT, as applicable. GMO will follow the instructions specified in the Formula Rate to calculate annually its Annual Transmission Revenue Requirements ("ATRR") for Network Integration Transmission Service, rates for Point-to-Point transmission service, its ATRR associated with transmission upgrade projects having cost recovery under Schedule 11 of the SPP OATT, and rates for Ancillary Services Schedule 1 - Scheduling System Control and Dispatch Services, for posting by GMO and SPP, as applicable.
2. The Formula Rate shall be applicable to service on and after January 1 of each calendar year through December 31 of the same calendar year ("Rate Year"), subject to review, challenge and refunds or surcharges with interest, as provided herein.
3. Each calendar year, GMO shall:
 - (a) Calculate the ATRR by September 24 (or the next business day if September 24 is not a business day) for the next Rate Year in accordance with the Formula Rate ("Annual Update"). The Formula Rate specifies in detail the manner in which
 - i. the most recent Form No. 1 data shall be used as inputs and the limited projections of transmission plant and associated transmission depreciation expense, transmission O&M expense, A&G expense, revenue credits, and load will be forecast for the next Rate Year in the Annual Update; and
 - ii. any true-up calculated in accordance with the Formula Rate, including interest, ("True-Up Adjustment") for the prior Rate Year shall be incorporated into the Annual Update for the next Rate Year;
 - (b) Interest on any over-recovery or under-recovery of the net revenue requirements shall be calculated in accordance with the Formula true-up worksheet (Worksheet TU(True-Up)). Interest on an over-recovery or under-recovery of a revenue requirement shall be determined according to the Formula;

- (c) Calculate the True-Up Adjustment for a given Rate Year and post it by June 1 (or the next business day if June 1 is not a business day) of the year following that Rate Year in accordance with the Formula Rate, which adjustment will be reflected in the next Annual Update. The True-Up Adjustment shall include a Formula template with the actual data for the prior Rate Year compared to the previously projected data for the same period;
- (d) Calculate the ATRR values for transmission service for the next Rate Year which shall be the Annual Update for such Rate Year, plus or minus the True-up Adjustment from the previous Rate Year;
- (e) Post such Annual Update (each September 24) and True-Up Adjustment (each June 1), as well as a populated Formula template in fully functional spreadsheets showing the calculation of such Annual Update and True-Up Adjustment with documentation supporting such calculation as provided in Section I.4, below, and, with respect to the Annual Update, information supporting the limited projections described in Section I.3.a.i., above, (which information shall include, but is not limited to, the following information for all transmission facilities included in the expected plant additions: (i) expected date of completion; (ii) percent completion status as of the date of the Annual Update; (iii) a one-line diagram of facilities exceeding \$5 million in cost; (iv) the total installed cost of the facility; (v) the reason for the facility addition; and (vi) upgrade costs paid by a generator or paid by a transmission customer directly to GMO) in an accessible location on the SPP's website and OASIS (the date of such posting is referred to herein as the "Posting Date") . Any delay in the Posting Date will result in an equivalent extension of time for the submission of information requests discussed in Section II of these protocols;
- (f) On the Posting Date, notify Interested Parties, on the SPP email exploder list titled "Service List", of the website address of the Annual Update and True-Up Adjustment postings. For purposes of these procedures, the term Interested Party includes, but is not limited to, customers under the OATT, state utility regulatory commissions, consumer advocacy agencies, and state attorneys general ("Interested Parties"). Interested Parties can contact SPP to subscribe to the SPP Service List;
- (g) Make a good faith effort to respond within ten (10) business days to reasonable information requests submitted by Interested Parties for information and work papers supporting the Annual Update. Any such information request must be submitted within thirty (30) days of the Posting Date of the Annual Update and shall be limited to that which is appropriate to determine if GMO has properly calculated the Annual

Update and whether the costs included in the Annual Update are appropriately recovered under the terms of the Formula Rate and the Formula Rate has been applied according to its terms; and

- (h) Provide its Interested Parties, via e-mail based on the SPP Service List, at least thirty (30) days (all references herein to days shall be calendar days unless specified otherwise) advance notice of a public meeting (which shall include, at GMO's option, video conferencing, webinar or internet conference) to be held no sooner than ten (10) days after the Posting Date of the Annual Update and no later than October 16 each year, to explain and answer questions regarding the Annual Update for the next calendar year. GMO shall modify the Annual Update to reflect any changes that it and the participating transmission customers all agree upon by no later than November 20 and shall cause the revised Annual Update to be posted in the same manner as the original Annual Update.

4. The True-Up Adjustment for the prior Rate Year shall:

- (a) Be based upon GMO's FERC Form No. 1 for that Rate Year, and, to the extent specified in the Formula Rate, upon the books and records of GMO (GMO's FERC Form No. 1, books, and records all to be maintained consistently with FERC's Uniform System of Accounts ("USoA") and FERC accounting policies and practices);
- (b) Be calculated pro rata based on the months during the Rate Year when the ATRR was in effect by multiplying the Annual True-Up Adjustment by the number of months that the ATRR was in effect divided by 12;
- (c) Include a variance analysis of, at minimum, actual revenue requirement components of rate base, operating and maintenance expenses, depreciation expense, taxes, return on rate base, and revenue credits as compared to the corresponding components in the projected revenue requirement that was calculated for the prior Rate Year with an explanation of material changes.
- (d) As and to the extent specified in the Formula Rate, provide sufficiently detailed supporting documentation for data (and all adjustments thereto or allocations thereof) that are used to develop the actual ATRR for the applicable Rate Year and are not otherwise available directly from the FERC Form No. 1;
- (e) Include an identification of (i) any changes in GMO accounting policies, practices, and procedures (including changes resulting from revisions to FERC's Uniform System of Accounts and/or Form No. 1 reporting requirements) from those in effect during the calendar year upon which the most recent ATRR was based and that, in GMO's reasonable

judgment, could impact the Formula Rate or the calculations under the Formula Rate within the next three years; (ii) any changes in the SPP OATT from the provisions of the SPP OATT in effect during the calendar year upon which the most recent ATRR was based and that, in GMO's reasonable judgment, could impact the Formula Rate or the calculations under the Formula Rate within the next three years; and (iii) any change, and the dollar value of the change, in the classification of any transmission facility under Attachment AI of the SPP OATT (including the costs of any reclassified facility) that GMO has made in the applicable True-Up Adjustment or Annual Update; and

- (f) Be subject to review and challenge in accordance with the procedures set forth in these Formula Rate Implementation Protocols.
5. A change to the Formula Rate inputs related to extraordinary property losses, return on equity, depreciation rates for each regulatory jurisdiction that are used to calculate the composite rates applied in the Formula Rate, or Post Employment Benefits Other than Pensions may not be made absent an appropriate Federal Power Act Section 205 or 206 filing with the FERC.
 6. If GMO files any corrections or modifications to its FERC Form No. 1 prior to the Posting Date of its Annual Update and such corrections or modifications would affect the True-Up Adjustment for a prior Rate Year, the True-Up Adjustment for each Rate Year(s) affected by the corrections or modifications shall be updated to reflect the corrected or modified FERC Form No. 1 and the Annual Update shall incorporate the change in such True-Up Adjustment(s), with interest. Corrections or modifications to a FERC Form No. 1 filed after the Posting Date of an Annual Update and not included in a revised Annual Update by November 20 shall be incorporated in the next True-Up Adjustment or Annual Update, as applicable. GMO shall report in a timely manner to the FERC, the applicable state commissions, and all parties required by FERC regulations any corrections or modifications to its FERC Form No. 1, that affect materially the past or present implementation of the Formula Rate, whether such corrections or modifications have the effect of increasing or decreasing the resulting transmission rates.

II. Review Procedures for Annual Update and True-Up Adjustment

Each Annual Update and True-Up Adjustment for the prior Rate Year shall be subject to the following review procedures ("Annual Review Procedures") (if any of the dates provided for herein fall on a Saturday, Sunday or Federal bank holiday, then the due date shall be the first business day thereafter):

1. Review procedures specific to the Annual Update are stated in Sections I.3(e) through (h).
2. Each year, GMO will, with at least thirty (30) days' notice utilizing the SPP

Service List, convene a meeting (including video conferencing, webinar or internet conferencing, at GMO's option) of its Interested Parties, no sooner than ten (10) days after the Posting Date of the True-Up Adjustment and no later than July 8, at GMO's offices in Kansas City, Missouri, to discuss the True-Up Adjustment ("Customer Meeting").

3. Interested Parties may begin submitting information requests immediately following the Posting Date of the True-Up Adjustment and will have one-hundred five (105) days after June 1 to serve reasonable information requests on GMO for information and work papers supporting the True-Up Adjustment for the prior Rate Year. Such information and document requests shall be limited to what is necessary to determine:
 - (a) the extent or effect of an Accounting Change;
 - (b) whether the Annual True-Up or projected net revenue requirement fails to include data properly recorded in accordance with these Protocols;
 - (c) the proper application of the formula rate and procedures in these Protocols;
 - (d) the accuracy of data and consistency with the formula rate of the calculations shown in the Annual True-Up or projected net revenue requirement;
 - (e) the prudence of actual costs and expenditures;
 - (f) the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or
 - (g) any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the formula.

Without limiting the generality of the foregoing, such information requests may include questions related to the data described in Sections I.4(a) and (c) and Section I.6 above.

4. GMO shall make a good faith effort to respond to information requests pertaining to a True-Up Adjustment within ten (10) business days of receipt of such requests. Information requests received after 4 p.m. Central Prevailing Time shall be considered received the next business day.
5. To the extent GMO and any Interested Party(ies) are unable to resolve disputes related to information requests for the Annual Update or True-up Adjustment submitted in accordance with these Formula Rate Implementation Protocols, GMO or any Interested Party may petition the FERC to appoint an Administrative

Law Judge as a discovery master. The discovery master shall have the power to issue binding orders to resolve discovery disputes and compel the production of discovery, as appropriate, in accordance with the Formula Rate Implementation Protocols and consistent with the FERC's discovery rules.

6. Any Interested Party shall have until the later of one-hundred fifty (150) days after June 1 or thirty (30) days after GMO's last response to reasonable information requests submitted pursuant to Section II.2 above to notify GMO in writing of any specific challenges to the Annual Update or True-Up Adjustment ("Informal Challenges"). Challenges to the Formula Rate itself shall not be considered Informal Challenges for purposes of these Annual Review Procedures.

III. Resolution of Challenges

1. If GMO and any Interested Party(ies) have not resolved all Informal Challenges identified pursuant to Section II.6 above within sixty (60) days after the deadline in Section II.6 for written notification of Issues, senior management of the Interested Party(ies) and GMO shall make a good faith effort to resolve any outstanding Informal Challenges ("Senior Management Review").
2.
 - (a) If GMO's and any Interested Party's(ies)' senior management are unable to resolve all Informal Challenges within thirty (30) days after the Senior Management Review commences, the Interested Party(ies) may file a complaint challenging the Annual Update or True-Up Adjustment ("Formal Challenge"). Challenges to the Formula Rate itself shall not be considered "Formal Challenges" for purposes of these Annual Review Procedures.
 - (b) All information produced pursuant to these Protocols may be included in any Formal Challenge, in any other proceeding concerning the Formula Rate initiated at FERC pursuant to the Federal Power Act, or in any proceeding before the U.S. Court of Appeals to review a FERC decision involving the Formula Rate. GMO may, however, designate any response to an information request as confidential if the information conveyed is not publicly available. Interested Parties' representatives shall treat such response as confidential in connection with any of the proceedings discussed in this section; provided, however, that when so used, such response shall initially be filed under seal (unless the claim of confidentiality is waived by GMO), subject to a later determination by the presiding authority that the material is, in whole or in part, not entitled to confidential treatment.
3. In any proceeding ordered by the FERC in response to a Formal Challenge, GMO will bear the burden of proof in accordance with applicable FERC precedent as it may be modified by the FERC.

4. Any refunds or surcharges resulting from an Informal Challenge or Formal Challenge not resolved by November 20 shall be calculated, with interest, from the effective date of the challenged True-Up Adjustment, and shall be reflected in the True-Up Adjustment and Annual Update for the next Rate Year.
5. In the event that GMO identifies an error in an Annual Update or True-Up Adjustment (or a FERC Form No. 1 or successor form which is used as an input to the Formula Rate), or is required by applicable law or a court or regulatory body to correct an error, GMO shall correct such error in good faith and without regard to whether the correction increases or decreases GMO's revenue requirements. There will be no mid-year rate adjustments. Any such correction will be implemented in the True-Up Adjustment and Annual Update for the next Rate Year, with interest. Nothing in these Protocols should or may be construed as preventing an Interested Party or the FERC from contesting such correction.

IV. Informational Filing

1. By March 15 of each year, GMO shall submit to FERC an informational filing ("Informational Filing") of its projected net revenue requirement for the Rate Year, including its Annual Update and True-Up Adjustment. This Informational Filing must include the information that is reasonably necessary to determine: (1) that input data under the formula rate are properly recorded in any underlying workpapers; (2) that GMO has properly applied the formula rate and these procedures; (3) the accuracy of data and the consistency with the formula rate of the Transmission Revenue Requirement and rates under review; (4) the extent of accounting changes that affect formula rate inputs; and (5) the reasonableness of projected costs. The Informational Filing must also describe any corrections or adjustments made during that period, and must describe all aspects of the formula rate or its inputs that are the subject of an ongoing dispute under the Informal or Formal Challenge procedures. Within five (5) days of such Informational Filing, GMO shall provide notice of the Informational Filing via an email exploder list and by posting the docket number assigned to GMO's Informational Filing on the SPP website and OASIS.
2. Any challenges to the implementation of the Attachment H-GMO Formula Rate must be made through the Challenge Procedures described in Section III of these Protocols or in a separate complaint proceeding, and not in response to the Informational Filing.

V. Miscellaneous

1. Nothing in these Protocols limits or deprives GMO, the FERC or any Interested Party of any rights it may otherwise have under any applicable provision of the Federal Power Act. The provisions of these Protocols addressing review and challenge of the Annual Update or True-Up Adjustment are not intended to nor

shall be construed as limiting GMO's, FERC's or any party's rights under any applicable provision of the Federal Power Act.

2. Notwithstanding the provisions of Section V.1, before GMO or any Interested Party may bring any new action at the FERC involving the Formula Rate, senior management of such Interested Party(ies) and GMO shall make a good faith effort to resolve any outstanding issues. If GMO's and any Interested Party's(ies') senior management are unable to resolve all issues within thirty (30) days, then GMO or the Interested Party(ies) may bring such action. For the avoidance of doubt, the advance notice and negotiation requirement in this Section V.2 shall not apply to Formal Challenges (as to which the Senior Management Review provisions in Section III apply) nor shall the requirement bar an Interested Party from intervening in, filing a protest under FPA § 206 in, or fully participating in any proceeding initiated by the FERC *sua sponte* or otherwise properly initiated before the FERC.

Exhibit II
(GMO Redline Protocols)

KCP&L Greater Missouri Operations Company
Formula Rate Implementation Protocols

I. Annual Update

1. The formula rate template contained in Attachment H of the Southwest Power Pool, Inc. ("SPP") Open Access Transmission Tariff ("OATT"), Federal Energy Regulatory Commission ("FERC") Electric Tariff, Sixth Revised Volume No. 1 ("Formula") and these Formula Rate Implementation Protocols ("Protocols") together comprise the KCP&L Greater Missouri Operations ("GMO") filed rate (collectively, the "Formula Rate") for transmission service under the SPP OATT or the GMO OATT, as applicable. GMO will follow the instructions specified in the Formula Rate to calculate annually its Annual Transmission Revenue Requirements ("ATRR") for Network Integration Transmission Service, rates for Point-to-Point transmission service, its ATRR associated with transmission upgrade projects having cost recovery under Schedule 11 of the SPP OATT, and rates for Ancillary Services Schedule 1 - Scheduling System Control and Dispatch Services, for posting by GMO and SPP, as applicable.
2. The Formula Rate shall be applicable to service on and after January 1 of each calendar year through December 31 of the same calendar year ("Rate Year"), subject to review, challenge and refunds or surcharges with interest, as provided herein.
3. Each calendar year, GMO shall:
 - (a) Calculate the ATRR by September 24 (or the next business day if September 24 is not a business day) for the next Rate Year in accordance with the Formula Rate ("Annual Update"). The Formula Rate specifies in detail the manner in which
 - i. the most recent Form No. 1 data shall be used as inputs and the limited projections of transmission plant and associated transmission depreciation expense, transmission O&M expense, A&G expense, revenue credits, and load will be forecast for the next Rate Year in the Annual Update; and
 - ii. any true-up calculated in accordance with the Formula Rate, including interest, ("True-Up Adjustment") for the prior Rate Year shall be incorporated into the Annual Update for the next Rate Year;
 - (b) Interest on any over-recovery or under-recovery of the net revenue requirements shall be calculated in accordance with the Formula true-up worksheet (Worksheet TU(True-Up)). Interest on an over-recovery or under-recovery of a revenue requirement shall be determined according to the Formula;

- (c) Calculate the True-Up Adjustment for a given Rate Year and post it by June 1 (or the next business day if June 1 is not a business day) of the year following that Rate Year in accordance with the Formula Rate, which adjustment will be reflected in the next Annual Update. The True-Up Adjustment shall include a Formula template with the actual data for the prior Rate Year compared to the previously projected data for the same period;
- (d) Calculate the ATRR values for transmission service for the next Rate Year which shall be the Annual Update for such Rate Year, plus or minus the True-up Adjustment from the previous Rate Year;
- (e) Post such Annual Update (each September 24) and True-Up Adjustment (each June 1), as well as a populated Formula template in fully functional spreadsheets showing the calculation of such Annual Update and True-Up Adjustment with documentation supporting such calculation as provided in Section I.4, below, and, with respect to the Annual Update, information supporting the limited projections described in Section I.3.a.i., above, (which information shall include, but is not limited to, the following information for all transmission facilities included in the expected plant additions: (i) expected date of completion; (ii) percent completion status as of the date of the Annual Update; (iii) a one-line diagram of facilities exceeding \$5 million in cost; (iv) the total installed cost of the facility; (v) the reason for the facility addition; and (vi) upgrade costs paid by a generator or paid by a transmission customer directly to GMO) in an accessible location on the SPP's website~~GMO's and the SPP's and~~ OASIS website (the date of such posting is referred to herein as the "Posting Date"). Any delay in the Posting Date will result in an equivalent extension of time for the submission of information requests discussed in Section II of these protocols;
- (f) On the Posting Date, notify Interested Parties, on the SPP email exploder list titled "Service List"~~, its transmission customers, as well as any designated staff for the Missouri Public Service Commission ("MPSC") and the Kansas Corporation Commission ("KCC"), by e-mail using the most recent e-mail addresses provided to GMO,~~ of the website address of the Annual Update and True-Up Adjustment postings. For purposes of these procedures, the term Interested Party includes, but is not limited to, customers under the OATT, state utility regulatory commissions, consumer advocacy agencies, and state attorneys general ("Interested Parties"). Interested Parties can contact SPP to subscribe to the SPP Service List;
- (g) Make a good faith effort to respond within ten (10) business days to reasonable information requests submitted by interested Parties for information and work papers supporting the Annual Update. Any such

information request must be submitted within thirty (30) days of the Posting Date [of the Annual Update](#) and shall be limited to that which is appropriate to determine if GMO has properly calculated the Annual Update and whether the costs included in the Annual Update are appropriately recovered under the terms of the Formula Rate and the Formula Rate has been applied according to its terms; and

- (h) Provide its [Interested Parties](#)~~transmission customers and any MPSC or KCC designated staff~~, via e-mail [based on the SPP Service List](#)~~to the most recent e-mail addresses provided to GMO~~, at least thirty (30) days (all references herein to days shall be calendar days unless specified otherwise) advance notice of a public meeting (which shall include, at GMO's option, video conferencing, webinar or internet conference) to be held no sooner than ten (10) days after the Posting Date of the Annual Update and no later than October 16 each year, to explain and answer questions regarding the Annual Update for the next calendar year. GMO shall modify the Annual Update to reflect any changes that it and the participating transmission customers all agree upon by no later than November 20 and shall cause the revised Annual Update to be posted in the same manner as the original Annual Update.

4. The True-Up Adjustment for the prior Rate Year shall:

- (a) Be based upon GMO's FERC Form No. 1 for that Rate Year, and, to the extent specified in the Formula Rate, upon the books and records of GMO (GMO's FERC Form No. 1, books, and records all to be maintained consistently with FERC's Uniform System of Accounts ("USoA") and FERC accounting policies and practices);
- (b) Be calculated pro rata based on the months during the Rate Year when the ATRR was in effect by multiplying the Annual True-Up Adjustment by the number of months that the ATRR was in effect divided by 12;
- (c) Include a variance analysis of, at minimum, actual revenue requirement components of rate base, operating and maintenance expenses, depreciation expense, taxes, return on rate base, and revenue credits as compared to the corresponding components in the projected revenue requirement that was calculated for the prior Rate Year with an explanation of material changes.
- (d) As and to the extent specified in the Formula Rate, provide sufficiently detailed supporting documentation for data (and all adjustments thereto or allocations thereof) that are used to develop the actual ATRR for the applicable Rate Year and are not otherwise available directly from the FERC Form No. 1;

- (e) Include an identification of (i) any changes in GMO accounting policies, practices, and procedures (including changes resulting from revisions to FERC's Uniform System of Accounts and/or Form No. 1 reporting requirements) from those in effect during the calendar year upon which the most recent ATRR was based and that, in GMO's reasonable judgment, could impact the Formula Rate or the calculations under the Formula Rate within the next three years; (ii) any changes in the SPP OATT from the provisions of the SPP OATT in effect during the calendar year upon which the most recent ATRR was based and that, in GMO's reasonable judgment, could impact the Formula Rate or the calculations under the Formula Rate within the next three years; and (iii) any change, and the dollar value of the change, in the classification of any transmission facility under Attachment AI of the SPP OATT (including the costs of any reclassified facility) that GMO has made in the applicable True-Up Adjustment or Annual Update; and
 - (f) Be subject to review and challenge in accordance with the procedures set forth in these Formula Rate Implementation Protocols.
- 5. A change to the Formula Rate inputs related to extraordinary property losses, return on equity, depreciation rates for each regulatory jurisdiction that are used to calculate the composite rates applied in the Formula Rate, or Post Employment Benefits Other than Pensions may not be made absent an appropriate Federal Power Act Section 205 or 206 filing with the FERC.
 - 6. If GMO files any corrections or modifications to its FERC Form No. 1 prior to the Posting Date of its Annual Update and such corrections or modifications would affect the True-Up Adjustment for a prior Rate Year, the True-Up Adjustment for each Rate Year(s) affected by the corrections or modifications shall be updated to reflect the corrected or modified FERC Form No. 1 and the Annual Update shall incorporate the change in such True-Up Adjustment(s), with interest. Corrections or modifications to a FERC Form No. 1 filed after the Posting Date of an Annual Update and not included in a revised Annual Update by November 20 shall be incorporated in the next True-Up Adjustment or Annual Update, as applicable. GMO shall report in a timely manner to the FERC, the applicable state commissions, and all parties required by FERC regulations any corrections or modifications to its FERC Form No. 1, that affect materially the past or present implementation of the Formula Rate, whether such corrections or modifications have the effect of increasing or decreasing the resulting transmission rates.

II. Review Procedures for [Annual Update and True-Up Adjustment](#)

Each [Annual Update and True-Up Adjustment](#) for the prior Rate Year shall be subject to the following review procedures (“Annual Review Procedures”) (if any of the dates provided for herein fall on a Saturday, Sunday or Federal bank holiday, then the due date shall be the first business day thereafter):

1. [Review procedures specific to the Annual Update are stated in Sections I.3\(e\) through \(h\).](#)
- 1.2. ~~1.~~ Each year, GMO will, with at least thirty (30) days’ notice [utilizing the SPP Service List](#), convene a meeting (including video conferencing, webinar or internet conferencing, at GMO’s option) of its [Interested Parties](#) ~~Transmission-Customers and any designated staff of the MPSC~~, no sooner than ten (10) days after the Posting Date of the True-Up Adjustment and no later than July 8, at GMO’s offices in Kansas City, Missouri, to discuss the True-Up Adjustment (“Customer Meeting”).
3. ~~2.~~ Interested [Parties](#) may begin submitting information requests immediately following the Posting Date of the True-Up Adjustment and will have one-hundred five (105) days after June 1 to serve reasonable information requests on GMO for information and work papers supporting the True-Up Adjustment for the prior Rate Year. ~~Such information requests shall be limited to that which is appropriate to determine if GMO has properly calculated the True-Up Adjustment under review (including any corrections pursuant to Section I.6) and whether the costs included in the True-Up Adjustment are properly recorded, prudently incurred, and appropriately recovered under the terms of the Formula Rate and the Formula Rate has been applied according to its terms.~~ [Such information and document requests shall be limited to what is necessary to determine:](#)
 - [\(a\) the extent or effect of an Accounting Change;](#)
 - [\(b\) whether the Annual True-Up or projected net revenue requirement fails to include data properly recorded in accordance with these Protocols;](#)
 - [\(c\) the proper application of the formula rate and procedures in these Protocols;](#)
 - [\(d\) the accuracy of data and consistency with the formula rate of the calculations shown in the Annual True-Up or projected net revenue requirement;](#)
 - [\(e\) the prudence of actual costs and expenditures;](#)
 - [\(f\) the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or](#)

(g) any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the formula.

Without limiting the generality of the foregoing, such information requests may include questions related to the data described in Sections I.4(a) and (c) and Section I.6 above.

~~2.4.~~ ~~3.~~—GMO shall make a good faith effort to respond to information requests pertaining to a True-Up Adjustment within ten (10) business days of receipt of such requests. Information requests received after 4 p.m. Central Prevailing Time shall be considered received the next business day.

~~3.5.~~ ~~4.~~—To the extent GMO and any Interested Party(ies) are unable to resolve disputes related to information requests for the Annual Update or True-up Adjustment submitted in accordance with these Formula Rate Implementation Protocols, GMO or any Interested Party may petition the FERC to appoint an Administrative Law Judge as a discovery master. The discovery master shall have the power to issue binding orders to resolve discovery disputes and compel the production of discovery, as appropriate, in accordance with the Formula Rate Implementation Protocols and consistent with the FERC's discovery rules.

~~4.6.~~ ~~5.~~—Any Interested Party shall have until the later of one-hundred fifty (150) days after June 1 or thirty (30) days after GMO's last response to reasonable information requests submitted pursuant to Section II.2 above to notify GMO in writing of any specific challenges to the Annual Update or True-Up Adjustment ("Informal Challenges~~Issues~~"). Challenges to the Formula Rate itself shall not be considered Informal Challenges~~Issues~~" for purposes of these Annual Review Procedures.

III. Resolution of Challenges

~~For each True-Up Adjustment:~~

1. If GMO and any Interested Party(ies) have not resolved all Informal Challenges~~Issues~~ identified pursuant to Section II.~~65~~ above within sixty (60) days after the deadline in Section II.~~65~~ for written notification of Issues, senior management of the Interested Party(ies) and GMO shall make a good faith effort to resolve any outstanding Informal Challenges~~Issues~~ ("Senior Management Review").
2. (a) If GMO's and any Interested Party's(ies') senior management are unable to resolve all Informal Challenges~~Issues~~ within thirty (30) days after the Senior Management Review commences, the Interested Party(ies) may file a complaint ~~pursuant to Sections 206 or 306 of the Federal Power Act~~ challenging the Annual Update or True-Up Adjustment ("Formal

Challenge”). Challenges to the Formula Rate itself shall not be considered “Formal Challenges” for purposes of these Annual Review Procedures.

- (b) All information produced pursuant to these Protocols may be included in any Formal Challenge, in any other proceeding concerning the Formula Rate initiated at FERC pursuant to the Federal Power Act, or in any proceeding before the U.S. Court of Appeals to review a FERC decision involving the Formula Rate. GMO may, however, designate any response to an information request as confidential if the information conveyed is not publicly available. Interested Parties’ representatives shall treat such response as confidential in connection with any of the proceedings discussed in this section; provided, however, that when so used, such response shall initially be filed under seal (unless the claim of confidentiality is waived by GMO), subject to a later determination by the presiding authority that the material is, in whole or in part, not entitled to confidential treatment.
3. In any proceeding ordered by the FERC in response to a Formal Challenge, GMO will bear the burden of proof in accordance with applicable FERC precedent as it may be modified by the FERC.
4. Any refunds or surcharges resulting from an [Informal Challenge or Formal Challenge not resolved by November 20](#) shall be calculated, with interest, from the effective date of the challenged True-Up Adjustment, and shall be reflected in the True-Up Adjustment and Annual Update for the next Rate Year.
5. In the event that GMO identifies an error in an [Annual Update or True-Up Adjustment](#) (or a FERC Form No. 1 or successor form which is used as an input to the Formula Rate), or is required by applicable law or a court or regulatory body to correct an error, GMO shall correct such error in good faith and without regard to whether the correction increases or decreases GMO’s revenue requirements. There will be no mid-year rate adjustments. Any such correction will be implemented in the True-Up Adjustment and Annual Update for the next Rate Year, with interest. Nothing in these Protocols should or may be construed as preventing an Interested Party or the FERC from contesting such correction.

IV. Informational Filing

1. By March 15 of each year, GMO shall submit to FERC an informational filing (“Informational Filing”) of its projected net revenue requirement for the Rate Year, including its Annual Update and True-Up Adjustment. This Informational Filing must include the information that is reasonably necessary to determine: (1) that input data under the formula rate are properly recorded in any underlying workpapers; (2) that GMO has properly applied the formula rate and these procedures; (3) the accuracy of data and the consistency with the formula rate of

the Transmission Revenue Requirement and rates under review; (4) the extent of accounting changes that affect formula rate inputs; and (5) the reasonableness of projected costs. The Informational Filing must also describe any corrections or adjustments made during that period, and must describe all aspects of the formula rate or its inputs that are the subject of an ongoing dispute under the Informal or Formal Challenge procedures. Within five (5) days of such Informational Filing, GMO shall provide notice of the Informational Filing via an email exploder list and by posting the docket number assigned to GMO's Informational Filing on the SPP website and OASIS.

2. Any challenges to the implementation of the Attachment H-GMO Formula Rate must be made through the Challenge Procedures described in Section III of these Protocols or in a separate complaint proceeding, and not in response to the Informational Filing.

IV. Miscellaneous

1. Nothing in these Protocols limits or deprives GMO, the FERC or any Interested Party of any rights it may otherwise have under any applicable provision of the Federal Power Act. The provisions of these Protocols addressing review and challenge of the Annual Update or True-Up Adjustment are not intended to nor shall be construed as limiting GMO's, FERC's or any party's rights under any applicable provision of the Federal Power Act.
2. Notwithstanding the provisions of Section IV.1, before GMO or any Interested Party may bring any new action at the FERC involving the Formula Rate, senior management of such Interested Party(ies) and GMO shall make a good faith effort to resolve any outstanding issues. If GMO's and any Interested Party's(ies') senior management are unable to resolve all issues within thirty (30) days, then GMO or the Interested Party(ies) may bring such action. For the avoidance of doubt, the advance notice and negotiation requirement in this Section IV.2 shall not apply to Formal Challenges (as to which the Senior Management Review provisions in Section III apply) nor shall the requirement bar an Interested Party from intervening in, filing a protest under FPA § 206 in, or fully participating in any proceeding initiated by the FERC *sua sponte* or otherwise properly initiated before the FERC.

Exhibit III
(KCP&L Clean Protocols)

Kansas City Power & Light Company
Formula Rate Implementation Protocols

I. Annual Update

1. The formula rate template contained in Attachment H of the Southwest Power Pool, Inc. ("SPP") Open Access Transmission Tariff ("OATT"), Federal Energy Regulatory Commission ("FERC") Electric Tariff, Sixth Revised Volume No. 1 ("Formula") and these Formula Rate Implementation Protocols ("Protocols") together comprise the Kansas City Power & Light Company ("KCP&L") filed rate (collectively, the "Formula Rate") for transmission service under the SPP OATT. KCP&L will follow the instructions specified in the Formula Rate to calculate annually its Annual Transmission Revenue Requirements ("ATRR") for Network Integration Transmission Service, rates for Point-to-Point transmission service, its ATRR associated with transmission upgrade projects having cost recovery under Schedule 11 of the SPP OATT, and rates for Ancillary Services Schedule 1 - Scheduling System Control and Dispatch Services, for posting by KCP&L and SPP, as applicable.
2. The Formula Rate shall be applicable to service on and after January 1 of each calendar year through December 31 of the same calendar year ("Rate Year"), subject to review, challenge and refunds or surcharges with interest, as provided herein.
3. Each calendar year, KCP&L shall:
 - (a) Calculate the ATRR by September 24 (or the next business day if September 24 is not a business day) for the next Rate Year in accordance with the Formula Rate ("Annual Update"). The Formula Rate specifies in detail the manner in which
 - i. the most recent Form No. 1 data shall be used as inputs and the limited projections of transmission plant and associated transmission depreciation expense, transmission O&M expense, A&G expense, revenue credits, and load will be forecast for the next Rate Year in the Annual Update; and
 - ii. any true-up calculated in accordance with the Formula Rate, including interest, ("True-Up Adjustment") for the prior Rate Year shall be incorporated into the Annual Update for the next Rate Year;
 - (b) Interest on any over-recovery or under-recovery of the net revenue requirements shall be calculated in accordance with the Formula true-up worksheet (Worksheet TU(True-Up)). Interest on an over-recovery or under-recovery of a revenue requirement shall be determined according to the Formula;

- (c) Calculate the True-Up Adjustment for a given Rate Year and post it by June 1 (or the next business day if June 1 is not a business day) of the year following that Rate Year in accordance with the Formula Rate, which adjustment will be reflected in the next Annual Update. The True-Up Adjustment shall include a Formula template with the actual data for the prior Rate Year compared to the previously projected data for the same period;
- (d) Calculate the ATRR values for transmission service for the next Rate Year which shall be the Annual Update for such Rate Year, plus or minus the True-up Adjustment from the previous Rate Year;
- (e) Post such Annual Update (each September 24) and True-Up Adjustment (each June 1), as well as a populated Formula template in fully functional spreadsheets showing the calculation of such Annual Update and True-Up Adjustment with documentation supporting such calculation as provided in Section I.4, below, and, with respect to the Annual Update, information supporting the limited projections described in Section I.3.a.i., above, (which information shall include, but is not limited to, the following information for all transmission facilities included in the expected plant additions: (i) expected date of completion; (ii) percent completion status as of the date of the Annual Update; (iii) a one-line diagram of facilities exceeding \$5 million in cost; (iv) the total installed cost of the facility; (v) the reason for the facility addition; and (vi) upgrade costs paid by a generator or paid by a transmission customer directly to KCP&L) in an accessible location on the SPP's website and OASIS (the date of such posting is referred to herein as the "Posting Date"). Any delay in the Posting Date will result in an equivalent extension of time for the submission of information requests discussed in Section II of these protocols;
- (f) On the Posting Date, notify Interested Parties, on the SPP email exploder list titled "Service List", of the website address of the Annual Update and True-Up Adjustment postings. For purposes of these procedures, the term Interested Party includes, but is not limited to, customers under the OATT, state utility regulatory commissions, consumer advocacy agencies, and state attorneys general ("Interested Parties"). Interested Parties can contact SPP to subscribe to the SPP Service List;
- (g) Make a good faith effort to respond within ten (10) business days to reasonable information requests submitted by Interested Parties for information and work papers supporting the Annual Update. Any such information request must be submitted within thirty (30) days of the Posting Date of the Annual Update and shall be limited to that which is appropriate to determine if KCP&L has properly calculated the Annual Update and whether the costs included in the Annual Update are

appropriately recovered under the terms of the Formula Rate and the Formula Rate has been applied according to its terms; and

- (h) Provide its Interested Parties, via e-mail based on the SPP Service List, at least thirty (30) days (all references herein to days shall be calendar days unless specified otherwise) advance notice of a public meeting (which shall include, at KCP&L's option, video conferencing, webinar or internet conference) to be held no sooner than ten (10) days after the Posting Date of the Annual Update and no later than October 16 each year, to explain and answer questions regarding the Annual Update for the next calendar year. KCP&L shall modify the Annual Update to reflect any changes that it and the participating transmission customers all agree upon by no later than November 20 and shall cause the revised Annual Update to be posted in the same manner as the original Annual Update.

4. The True-Up Adjustment for the prior Rate Year shall:

- (a) Be based upon KCP&L's FERC Form No. 1 for that Rate Year, and, to the extent specified in the Formula Rate, upon the books and records of KCP&L (KCP&L's FERC Form No. 1, books, and records all to be maintained consistently with FERC's Uniform System of Accounts ("USoA") and FERC accounting policies and practices);
- (b) Be calculated pro rata based on the months during the Rate Year when the ATRR was in effect by multiplying the Annual True-Up Adjustment by the number of months that the ATRR was in effect divided by 12;
- (c) Include a variance analysis of, at minimum, actual revenue requirement components of rate base, operating and maintenance expenses, depreciation expense, taxes, return on rate base, and revenue credits as compared to the corresponding components in the projected revenue requirement that was calculated for the prior Rate Year with an explanation of material changes.
- (d) As and to the extent specified in the Formula Rate, provide sufficiently detailed supporting documentation for data (and all adjustments thereto or allocations thereof) that are used to develop the actual ATRR for the applicable Rate Year and are not otherwise available directly from the FERC Form No. 1;
- (e) Include an identification of (i) any changes in KCP&L accounting policies, practices, and procedures (including changes resulting from revisions to FERC's Uniform System of Accounts and/or Form No. 1 reporting requirements) from those in effect during the calendar year upon which the most recent ATRR was based and that, in KCP&L's reasonable judgment, could impact the Formula Rate or the calculations under the

Formula Rate within the next three years; (ii) any changes in the SPP OATT from the provisions of the SPP OATT in effect during the calendar year upon which the most recent ATRR was based and that, in KCP&L's reasonable judgment, could impact the Formula Rate or the calculations under the Formula Rate within the next three years; and (iii) any change, and the dollar value of the change, in the classification of any transmission facility under Attachment AI of the SPP OATT (including the costs of any reclassified facility) that KCP&L has made in the applicable True-Up Adjustment or Annual Update; and

- (f) Be subject to review and challenge in accordance with the procedures set forth in these Formula Rate Implementation Protocols.
5. A change to the Formula Rate inputs related to extraordinary property losses, return on equity, depreciation rates for each regulatory jurisdiction that are used to calculate the composite rates applied in the Formula Rate, or Post Employment Benefits Other than Pensions may not be made absent an appropriate Federal Power Act Section 205 or 206 filing with the FERC.
 6. If KCP&L files any corrections or modifications to its FERC Form No. 1 prior to the Posting Date of its Annual Update and such corrections or modifications would affect the True-Up Adjustment for a prior Rate Year, the True-Up Adjustment for each Rate Year(s) affected by the corrections or modifications shall be updated to reflect the corrected or modified FERC Form No. 1 and the Annual Update shall incorporate the change in such True-Up Adjustment(s), with interest. Corrections or modifications to a FERC Form No. 1 filed after the Posting Date of an Annual Update and not included in a revised Annual Update by November 20 shall be incorporated in the next True-Up Adjustment or Annual Update, as applicable. KCP&L shall report in a timely manner to the FERC, the applicable state commissions, and all parties required by FERC regulations any corrections or modifications to its FERC Form No. 1, that affect materially the past or present implementation of the Formula Rate, whether such corrections or modifications have the effect of increasing or decreasing the resulting transmission rates.

II. Review Procedures for Annual Update and True-Up Adjustment

Each Annual Update and True-Up Adjustment for the prior Rate Year shall be subject to the following review procedures ("Annual Review Procedures") (if any of the dates provided for herein fall on a Saturday, Sunday or Federal bank holiday, then the due date shall be the first business day thereafter):

1. Review procedures specific to the Annual Update are stated in Sections I.3(e) through (h).
2. Each year, KCP&L will, with at least thirty (30) days' notice utilizing the SPP

Service List, convene a meeting (including video conferencing, webinar or internet conferencing, at KCP&L's option) of its Interested Parties, no sooner than ten (10) days after the Posting Date of the True-Up Adjustment and no later than July 8, at KCP&L's offices in Kansas City, Missouri, to discuss the True-Up Adjustment ("Customer Meeting").

3. Interested Parties may begin submitting information requests immediately following the Posting Date of the True-Up Adjustment and will have one-hundred five (105) days after June 1 to serve reasonable information requests on KCP&L for information and work papers supporting the True-Up Adjustment for the prior Rate Year. Such information and document requests shall be limited to what is necessary to determine:
 - (a) the extent or effect of an Accounting Change;
 - (b) whether the Annual True-Up or projected net revenue requirement fails to include data properly recorded in accordance with these Protocols;
 - (c) the proper application of the formula rate and procedures in these Protocols;
 - (d) the accuracy of data and consistency with the formula rate of the calculations shown in the Annual True-Up or projected net revenue requirement;
 - (e) the prudence of actual costs and expenditures;
 - (f) the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or
 - (g) any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the formula.

Without limiting the generality of the foregoing, such information requests may include questions related to the data described in Sections I.4(a) and (c) and Section I.6 above.

4. KCP&L shall make a good faith effort to respond to information requests pertaining to a True-Up Adjustment within ten (10) business days of receipt of such requests. Information requests received after 4 p.m. Central Prevailing Time shall be considered received the next business day.
5. To the extent KCP&L and any Interested Party(ies) are unable to resolve disputes related to information requests for the Annual Update or True-up Adjustment submitted in accordance with these Formula Rate Implementation Protocols, KCP&L or any Interested Party may petition the FERC to appoint an

Administrative Law Judge as a discovery master. The discovery master shall have the power to issue binding orders to resolve discovery disputes and compel the production of discovery, as appropriate, in accordance with the Formula Rate Implementation Protocols and consistent with the FERC's discovery rules.

6. Any Interested Party shall have until the later of one-hundred fifty (150) days after June 1 or thirty (30) days after KCP&L's last response to reasonable information requests submitted pursuant to Section II.2 above to notify KCP&L in writing of any specific challenges to the Annual Update or True-Up Adjustment ("Informal Challenges"). Challenges to the Formula Rate itself shall not be considered Informal Challenges for purposes of these Annual Review Procedures.

III. Resolution of Challenges

1. If KCP&L and any Interested Party(ies) have not resolved all Informal Challenges identified pursuant to Section II.6 above within sixty (60) days after the deadline in Section II.6 for written notification of Issues, senior management of the Interested Party(ies) and KCP&L shall make a good faith effort to resolve any outstanding Informal Challenges ("Senior Management Review").
2.
 - (a) If KCP&L's and any Interested Party's(ies') senior management are unable to resolve all Informal Challenges within thirty (30) days after the Senior Management Review commences, the Interested Party(ies) may file a complaint challenging the Annual Update or True-Up Adjustment ("Formal Challenge"). Challenges to the Formula Rate itself shall not be considered "Formal Challenges" for purposes of these Annual Review Procedures.
 - (b) All information produced pursuant to these Protocols may be included in any Formal Challenge, in any other proceeding concerning the Formula Rate initiated at FERC pursuant to the Federal Power Act, or in any proceeding before the U.S. Court of Appeals to review a FERC decision involving the Formula Rate. KCP&L may, however, designate any response to an information request as confidential if the information conveyed is not publicly available. Interested Parties' representatives shall treat such response as confidential in connection with any of the proceedings discussed in this section; provided, however, that when so used, such response shall initially be filed under seal (unless the claim of confidentiality is waived by KCP&L), subject to a later determination by the presiding authority that the material is, in whole or in part, not entitled to confidential treatment.
3. In any proceeding ordered by the FERC in response to a Formal Challenge, KCP&L will bear the burden of proof in accordance with applicable FERC precedent as it may be modified by the FERC.

4. Any refunds or surcharges resulting from an Informal Challenge or Formal Challenge not resolved by November 20 shall be calculated, with interest, from the effective date of the challenged True-Up Adjustment, and shall be reflected in the True-Up Adjustment and Annual Update for the next Rate Year.
5. In the event that KCP&L identifies an error in an Annual Update or True-Up Adjustment (or a FERC Form No. 1 or successor form which is used as an input to the Formula Rate), or is required by applicable law or a court or regulatory body to correct an error, KCP&L shall correct such error in good faith and without regard to whether the correction increases or decreases KCP&L's revenue requirements. There will be no mid-year rate adjustments. Any such correction will be implemented in the True-Up Adjustment and Annual Update for the next Rate Year, with interest. Nothing in these Protocols should or may be construed as preventing an Interested Party or the FERC from contesting such correction.

IV. Informational Filing

1. By March 15 of each year, KCP&L shall submit to FERC an informational filing ("Informational Filing") of its projected net revenue requirement for the Rate Year, including its Annual Update and True-Up Adjustment. This Informational Filing must include the information that is reasonably necessary to determine: (1) that input data under the formula rate are properly recorded in any underlying workpapers; (2) that KCP&L has properly applied the formula rate and these procedures; (3) the accuracy of data and the consistency with the formula rate of the Transmission Revenue Requirement and rates under review; (4) the extent of accounting changes that affect formula rate inputs; and (5) the reasonableness of projected costs. The Informational Filing must also describe any corrections or adjustments made during that period, and must describe all aspects of the formula rate or its inputs that are the subject of an ongoing dispute under the Informal or Formal Challenge procedures. Within five (5) days of such Informational Filing, KCP&L shall provide notice of the Informational Filing via an email exploder list and by posting the docket number assigned to KCP&L's Informational Filing on the SPP website and OASIS.
2. Any challenges to the implementation of the Attachment H-KCP&L Formula Rate must be made through the Challenge Procedures described in Section III of these Protocols or in a separate complaint proceeding, and not in response to the Informational Filing.

V. Miscellaneous

1. Nothing in these Protocols limits or deprives KCP&L, the FERC or any Interested Party of any rights it may otherwise have under any applicable provision of the Federal Power Act. The provisions of these Protocols addressing review and

challenge of the Annual Update or True-Up Adjustment are not intended to nor shall be construed as limiting KCP&L's, FERC's or any party's rights under any applicable provision of the Federal Power Act.

2. Notwithstanding the provisions of Section V.1, before KCP&L or any Interested Party may bring any new action at the FERC involving the Formula Rate, senior management of such Interested Party(ies) and KCP&L shall make a good faith effort to resolve any outstanding issues. If KCP&L's and any Interested Party's(ies') senior management are unable to resolve all issues within thirty (30) days, then KCP&L or the Interested Party(ies) may bring such action. For the avoidance of doubt, the advance notice and negotiation requirement in this Section V.2 shall not apply to Formal Challenges (as to which the Senior Management Review provisions in Section III apply) nor shall the requirement bar an Interested Party from intervening in, filing a protest under FPA § 206 in, or fully participating in any proceeding initiated by the FERC *sua sponte* or otherwise properly initiated before the FERC.

Exhibit IV
(KCP&L Redline Protocols)

Kansas City Power & Light Company
Formula Rate Implementation Protocols

I. Annual Update

1. The formula rate template contained in Attachment H of the Southwest Power Pool, Inc. ("SPP") Open Access Transmission Tariff ("OATT"), Federal Energy Regulatory Commission ("FERC") Electric Tariff, Sixth Revised Volume No. 1 ("Formula") and these Formula Rate Implementation Protocols ("Protocols") together comprise the Kansas City Power & Light Company ("KCP&L") filed rate (collectively, the "Formula Rate") for transmission service under the SPP OATT. KCP&L will follow the instructions specified in the Formula Rate to calculate annually its Annual Transmission Revenue Requirements ("ATRR") for Network Integration Transmission Service, rates for Point-to-Point transmission service, its ATRR associated with transmission upgrade projects having cost recovery under Schedule 11 of the SPP OATT, and rates for Ancillary Services Schedule 1 - Scheduling System Control and Dispatch Services, for posting by KCP&L and SPP, as applicable.
2. The Formula Rate shall be applicable to service on and after January 1 of each calendar year through December 31 of the same calendar year ("Rate Year"), subject to review, challenge and refunds or surcharges with interest, as provided herein.
3. Each calendar year, KCP&L shall:
 - (a) Calculate the ATRR by September 24 (or the next business day if September 24 is not a business day) for the next Rate Year in accordance with the Formula Rate ("Annual Update"). The Formula Rate specifies in detail the manner in which
 - i. the most recent Form No. 1 data shall be used as inputs and the limited projections of transmission plant and associated transmission depreciation expense, transmission O&M expense, A&G expense, revenue credits, and load will be forecast for the next Rate Year in the Annual Update; and
 - ii. any true-up calculated in accordance with the Formula Rate, including interest, ("True-Up Adjustment") for the prior Rate Year shall be incorporated into the Annual Update for the next Rate Year;
 - (b) Interest on any over-recovery or under-recovery of the net revenue requirements shall be calculated in accordance with the Formula true-up worksheet (Worksheet TU(True-Up)). Interest on an over-recovery or under-recovery of a revenue requirement shall be determined according to the Formula;

- (c) Calculate the True-Up Adjustment for a given Rate Year and post it by June 1 (or the next business day if June 1 is not a business day) of the year following that Rate Year in accordance with the Formula Rate, which adjustment will be reflected in the next Annual Update. The True-Up Adjustment shall include a Formula template with the actual data for the prior Rate Year compared to the previously projected data for the same period;
- (d) Calculate the ATRR values for transmission service for the next Rate Year which shall be the Annual Update for such Rate Year, plus or minus the True-up Adjustment from the previous Rate Year;
- (e) Post such Annual Update (each September 24) and True-Up Adjustment (each June 1), as well as a populated Formula template in fully functional spreadsheets showing the calculation of such Annual Update and True-Up Adjustment with documentation supporting such calculation as provided in Section I.4, below, and, with respect to the Annual Update, information supporting the limited projections described in Section I.3.a.i., above, (which information shall include, but is not limited to, the following information for all transmission facilities included in the expected plant additions: (i) expected date of completion; (ii) percent completion status as of the date of the Annual Update; (iii) a one-line diagram of facilities exceeding \$5 million in cost; (iv) the total installed cost of the facility; (v) the reason for the facility addition; and (vi) upgrade costs paid by a generator or paid by a transmission customer directly to KCP&L) in an accessible location on ~~the SPP's website~~ KCP&L's and the SPP's and OASIS website (the date of such posting is referred to herein as the "Posting Date"). Any delay in the Posting Date will result in an equivalent extension of time for the submission of information requests discussed in Section II of these protocols;
- (f) On the Posting Date, notify Interested Parties, on the SPP email exploder list titled "Service List", ~~its transmission customers, as well as any designated staff for the Missouri Public Service Commission ("MPSC") and the Kansas Corporation Commission ("KCC"), by e-mail using the most recent e-mail addresses provided to KCP&L,~~ of the website address of the Annual Update and True-Up Adjustment postings. For purposes of these procedures, the term Interested Party includes, but is not limited to, customers under the OATT, state utility regulatory commissions, consumer advocacy agencies, and state attorneys general ("Interested Parties"). Interested Parties can contact SPP to subscribe to the SPP Service List;
- (g) Make a good faith effort to respond within ten (10) business days to reasonable information requests submitted by interested Parties for information and work papers supporting the Annual Update. Any such

information request must be submitted within thirty (30) days of the Posting Date [of the Annual Update](#) and shall be limited to that which is appropriate to determine if KCP&L has properly calculated the Annual Update and whether the costs included in the Annual Update are appropriately recovered under the terms of the Formula Rate and the Formula Rate has been applied according to its terms; and

- (h) Provide its [Interested Parties](#)~~transmission customers and any MPSC or KCC designated staff~~, via e-mail [based on the SPP Service List](#)~~to the most recent e-mail addresses provided to KCP&L~~, at least thirty (30) days (all references herein to days shall be calendar days unless specified otherwise) advance notice of a public meeting (which shall include, at KCP&L's option, video conferencing, webinar or internet conference) to be held no sooner than ten (10) days after the Posting Date of the Annual Update and no later than October 16 each year, to explain and answer questions regarding the Annual Update for the next calendar year. KCP&L shall modify the Annual Update to reflect any changes that it and the participating transmission customers all agree upon by no later than November 20 and shall cause the revised Annual Update to be posted in the same manner as the original Annual Update.

4. The True-Up Adjustment for the prior Rate Year shall:

- (a) Be based upon KCP&L's FERC Form No. 1 for that Rate Year, and, to the extent specified in the Formula Rate, upon the books and records of KCP&L (KCP&L's FERC Form No. 1, books, and records all to be maintained consistently with FERC's Uniform System of Accounts ("USoA") and FERC accounting policies and practices);
- (b) Be calculated pro rata based on the months during the Rate Year when the ATRR was in effect by multiplying the Annual True-Up Adjustment by the number of months that the ATRR was in effect divided by 12;
- (c) Include a variance analysis of, at minimum, actual revenue requirement components of rate base, operating and maintenance expenses, depreciation expense, taxes, return on rate base, and revenue credits as compared to the corresponding components in the projected revenue requirement that was calculated for the prior Rate Year with an explanation of material changes.
- (d) As and to the extent specified in the Formula Rate, provide sufficiently detailed supporting documentation for data (and all adjustments thereto or allocations thereof) that are used to develop the actual ATRR for the applicable Rate Year and are not otherwise available directly from the FERC Form No. 1;

- (e) Include an identification of (i) any changes in KCP&L accounting policies, practices, and procedures (including changes resulting from revisions to FERC's Uniform System of Accounts and/or Form No. 1 reporting requirements) from those in effect during the calendar year upon which the most recent ATRR was based and that, in KCP&L's reasonable judgment, could impact the Formula Rate or the calculations under the Formula Rate within the next three years; (ii) any changes in the SPP OATT from the provisions of the SPP OATT in effect during the calendar year upon which the most recent ATRR was based and that, in KCP&L's reasonable judgment, could impact the Formula Rate or the calculations under the Formula Rate within the next three years; and (iii) any change, and the dollar value of the change, in the classification of any transmission facility under Attachment AI of the SPP OATT (including the costs of any reclassified facility) that KCP&L has made in the applicable True-Up Adjustment or Annual Update; and
 - (f) Be subject to review and challenge in accordance with the procedures set forth in these Formula Rate Implementation Protocols.
5. A change to the Formula Rate inputs related to extraordinary property losses, return on equity, depreciation rates for each regulatory jurisdiction that are used to calculate the composite rates applied in the Formula Rate, or Post Employment Benefits Other than Pensions may not be made absent an appropriate Federal Power Act Section 205 or 206 filing with the FERC.
6. If KCP&L files any corrections or modifications to its FERC Form No. 1 prior to the Posting Date of its Annual Update and such corrections or modifications would affect the True-Up Adjustment for a prior Rate Year, the True-Up Adjustment for each Rate Year(s) affected by the corrections or modifications shall be updated to reflect the corrected or modified FERC Form No. 1 and the Annual Update shall incorporate the change in such True-Up Adjustment(s), with interest. Corrections or modifications to a FERC Form No. 1 filed after the Posting Date of an Annual Update and not included in a revised Annual Update by November 20 shall be incorporated in the next True-Up Adjustment or Annual Update, as applicable. KCP&L shall report in a timely manner to the FERC, the applicable state commissions, and all parties required by FERC regulations any corrections or modifications to its FERC Form No. 1, that affect materially the past or present implementation of the Formula Rate, whether such corrections or modifications have the effect of increasing or decreasing the resulting transmission rates.

II. Review Procedures for [Annual Update and True-Up Adjustment](#)

Each [Annual Update and True-Up Adjustment](#) for the prior Rate Year shall be subject to the following review procedures ("Annual Review Procedures") (if any of the dates provided for herein fall on a Saturday, Sunday or Federal bank holiday, then the due

date shall be the first business day thereafter):

1. Review procedures specific to the Annual Update are stated in Sections I.3(e) through (h).
- 1.2. ~~1.~~ 1.—Each year, KCP&L will, with at least thirty (30) days' notice utilizing the SPP Service List, convene a meeting (including video conferencing, webinar or internet conferencing, at KCP&L's option) of its Interested Parties ~~Transmission Customers and any designated staff of the MPSC and KCC~~, no sooner than ten (10) days after the Posting Date of the True-Up Adjustment and no later than July 8, at KCP&L's offices in Kansas City, Missouri, to discuss the True-Up Adjustment ("Customer Meeting").
3. ~~2.~~ 2.—Interested Parties may begin submitting information requests immediately following the Posting Date of the True-Up Adjustment and will have one-hundred five (105) days after June 1 to serve reasonable information requests on KCP&L for information and work papers supporting the True-Up Adjustment for the prior Rate Year. ~~Such information requests shall be limited to that which is appropriate to determine if KCP&L has properly calculated the True-Up Adjustment under review (including any corrections pursuant to Section I.6) and whether the costs included in the True-Up Adjustment are properly recorded, prudently incurred, and appropriately recovered under the terms of the Formula Rate and the Formula Rate has been applied according to its terms.~~ Such information and document requests shall be limited to what is necessary to determine:
 - (a) the extent or effect of an Accounting Change;
 - (b) whether the Annual True-Up or projected net revenue requirement fails to include data properly recorded in accordance with these Protocols;
 - (c) the proper application of the formula rate and procedures in these Protocols;
 - (d) the accuracy of data and consistency with the formula rate of the calculations shown in the Annual True-Up or projected net revenue requirement;
 - (e) the prudence of actual costs and expenditures;
 - (f) the effect of any change to the underlying Uniform System of Accounts or FERC Form No. 1; or
 - (g) any other information that may reasonably have substantive effect on the calculation of the charge pursuant to the formula.

Without limiting the generality of the foregoing, such information requests may include questions related to the data described in Sections I.4(a) and (c) and Section I.6 above.

~~2.4.~~ ~~3.~~ KCP&L shall make a good faith effort to respond to information requests pertaining to a True-Up Adjustment within ten (10) business days of receipt of such requests. Information requests received after 4 p.m. Central Prevailing Time shall be considered received the next business day.

~~3.5.~~ ~~4.~~ To the extent KCP&L and any interested Party(ies) are unable to resolve disputes related to information requests for the Annual Update or True-up Adjustment submitted in accordance with these Formula Rate Implementation Protocols, KCP&L or any interested Party may petition the FERC to appoint an Administrative Law Judge as a discovery master. The discovery master shall have the power to issue binding orders to resolve discovery disputes and compel the production of discovery, as appropriate, in accordance with the Formula Rate Implementation Protocols and consistent with the FERC's discovery rules.

~~4.6.~~ ~~5.~~ Any interested Party shall have until the later of one-hundred fifty (150) days after June 1 or thirty (30) days after KCP&L's last response to reasonable information requests submitted pursuant to Section II.2 above to notify KCP&L in writing of any specific challenges to the Annual Update or True-Up Adjustment ("Informal Challenges~~Issues~~"). Challenges to the Formula Rate itself shall not be considered Informal Challenges~~Issues~~" for purposes of these Annual Review Procedures.

III. Resolution of Challenges

~~For each True-Up Adjustment:~~

1. If KCP&L and any interested Party(ies) have not resolved all Informal Challenges~~Issues~~ identified pursuant to Section II.~~65~~ above within sixty (60) days after the deadline in Section II.~~65~~ for written notification of Issues, senior management of the interested Party(ies) and KCP&L shall make a good faith effort to resolve any outstanding Informal Challenges~~Issues~~ ("Senior Management Review").
2. (a) If KCP&L's and any interested Party's(ies)' senior management are unable to resolve all Informal Challenges~~Issues~~ within thirty (30) days after the Senior Management Review commences, the interested Party(ies) may file a complaint ~~pursuant to Sections 206 or 306 of the Federal Power Act~~ challenging the Annual Update or True-Up Adjustment ("Formal Challenge"). Challenges to the Formula Rate itself shall not be considered "Formal Challenges" for purposes of these Annual Review Procedures.

- (b) All information produced pursuant to these Protocols may be included in any Formal Challenge, in any other proceeding concerning the Formula Rate initiated at FERC pursuant to the Federal Power Act, or in any proceeding before the U.S. Court of Appeals to review a FERC decision involving the Formula Rate. KCP&L may, however, designate any response to an information request as confidential if the information conveyed is not publicly available. Interested Parties' representatives shall treat such response as confidential in connection with any of the proceedings discussed in this section; provided, however, that when so used, such response shall initially be filed under seal (unless the claim of confidentiality is waived by KCP&L), subject to a later determination by the presiding authority that the material is, in whole or in part, not entitled to confidential treatment.
3. In any proceeding ordered by the FERC in response to a Formal Challenge, KCP&L will bear the burden of proof in accordance with applicable FERC precedent as it may be modified by the FERC.
 4. Any refunds or surcharges resulting from an [Informal Challenge](#) or Formal Challenge [not resolved by November 20](#) shall be calculated, with interest, from the effective date of the challenged True-Up Adjustment, and shall be reflected in the True-Up Adjustment and Annual Update for the next Rate Year.
 5. In the event that KCP&L identifies an error in an [Annual Update](#) or True-Up Adjustment (or a FERC Form No. 1 or successor form which is used as an input to the Formula Rate), or is required by applicable law or a court or regulatory body to correct an error, KCP&L shall correct such error in good faith and without regard to whether the correction increases or decreases KCP&L's revenue requirements. There will be no mid-year rate adjustments. Any such correction will be implemented in the True-Up Adjustment and Annual Update for the next Rate Year, with interest. Nothing in these Protocols should or may be construed as preventing an Interested Party or the FERC from contesting such correction.

IV. Informational Filing

1. By March 15 of each year, KCP&L shall submit to FERC an informational filing ("Informational Filing") of its projected net revenue requirement for the Rate Year, including its Annual Update and True-Up Adjustment. This Informational Filing must include the information that is reasonably necessary to determine: (1) that input data under the formula rate are properly recorded in any underlying workpapers; (2) that KCP&L has properly applied the formula rate and these procedures; (3) the accuracy of data and the consistency with the formula rate of the Transmission Revenue Requirement and rates under review; (4) the extent of accounting changes that affect formula rate inputs; and (5) the reasonableness of projected costs. The Informational Filing must also describe any corrections or adjustments made during that period, and must describe all aspects of the

formula rate or its inputs that are the subject of an ongoing dispute under the Informal or Formal Challenge procedures. Within five (5) days of such Informational Filing, KCP&L shall provide notice of the Informational Filing via an email exploder list and by posting the docket number assigned to KCP&L's Informational Filing on the SPP website and OASIS.

2. Any challenges to the implementation of the Attachment H-KCP&L Formula Rate must be made through the Challenge Procedures described in Section III of these Protocols or in a separate complaint proceeding, and not in response to the Informational Filing.

IV. Miscellaneous

1. Nothing in these Protocols limits or deprives KCP&L, the FERC or any Interested Party of any rights it may otherwise have under any applicable provision of the Federal Power Act. The provisions of these Protocols addressing review and challenge of the Annual Update or True-Up Adjustment are not intended to nor shall be construed as limiting KCP&L's, FERC's or any party's rights under any applicable provision of the Federal Power Act.
2. Notwithstanding the provisions of Section IV.1, before KCP&L or any Interested Party may bring any new action at the FERC involving the Formula Rate, senior management of such Interested Party(ies) and KCP&L shall make a good faith effort to resolve any outstanding issues. If KCP&L's and any Interested Party's(ies') senior management are unable to resolve all issues within thirty (30) days, then KCP&L or the Interested Party(ies) may bring such action. For the avoidance of doubt, the advance notice and negotiation requirement in this Section IV.2 shall not apply to Formal Challenges (as to which the Senior Management Review provisions in Section III apply) nor shall the requirement bar an Interested Party from intervening in, filing a protest under FPA § 206 in, or fully participating in any proceeding initiated by the FERC *sua sponte* or otherwise properly initiated before the FERC.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding, as well as the existing notification listing currently utilized for the KCP&L and GMO transmission formula rate communications.

Dated at Washington, D.C., this 15th day of September, 2014.

/s/ Cynthia A. Lewis

Cynthia A. Lewis

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