

FINAL TRANSCRIPT

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GXP - Q3 2011 Great Plains Energy Inc Earnings Conference Call

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PRESENTATION

Operator

Good morning, my name is Darla, and I will be your operator today. At this time, I would like to welcome everyone to the Third Quarter 2011 Earnings Conference Call. All lines have been placed on mute to prevent any background noise. After the speakers' remarks, there will be a question-and-answer session.

(Operator Instructions)

It is my pleasure to turn the call over to Kevin Bryant, Vice President of Investor Relations and Treasurer. Please go ahead, sir.

Kevin Bryant - *Great Plains Energy Inc - VP, Investor Relations and Treasurer*

Thank you and good morning. Welcome to Great Plains Energy's Third Quarter 2011 Earnings Conference Call. Joining me this morning to present this quarter's results are Mike Chesser, Chairman and Chief Executive Officer, Terry Bassham, President and Chief Operating Officer, and Jim Shay, Senior Vice President and Chief Financial Officer.

As we get today's call started, I must remind you of the inherent uncertainties in any forward-looking statement in our discussion this morning. Slide 2 and the disclosure in our SEC filings contain a list of some of the factors that could cause future results to differ materially from our expectations. I want to remind everyone that we issued our earnings release and third quarter 2011 10-Q after the market closed yesterday. I would also mention that we filed an 8-K describing our pursuit of additional wind generation earlier this morning. These items are available along with today's webcast slides and supplemental financial information regarding the quarter on the main page of our website at www.greatplainsenergy.com. With that I will now hand the call to Mike Chesser.

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Mike Chesser - *Great Plains Energy Inc - Chairman, CEO*

Thanks very much, Kevin. Good morning, everyone. I know there's a great deal of earnings-related activity in the industry this week, so as we approach the annual EEI conference, we appreciate you joining us for our morning call this morning.

During our August Analyst Day presentation we discussed a number of key drivers of long-term success. As summarized on the slide, our business plan is centered around the ability to deliver safe, low-cost electricity to our customers, while providing competitive shareholder returns. Our focus on delivery of improved total shareholder returns will be through earnings growth and a competitive dividend. We're executing the strategy outlined in August and are excited to share with you the progress to date.

I'd like to start with the 2011 earnings. Jim will provide the details in his comments, but I wanted to highlight our improved earnings outlook for 2011. As a result of warmer-than-normal weather, and favorable commercial sector demand during the quarter, we are increasing and narrowing our 2011 guidance range to \$1.22 to \$1.32 per share, from the previous \$1.10 to \$1.25. We will continue to monitor local and national economic conditions and plan our business conservatively.

We're also pleased to announce that our Board of Directors approved an increase in our quarterly common stock dividend, raising it from \$0.2075 to \$0.2125 cents per share on a quarterly basis, or from \$0.83 to \$0.85 per share on an annual basis. The completion of the comprehensive energy plan and solid execution for the first 9 months of 2011 has positioned the Company for this dividend action. Some key year-to-date accomplishments include the achievement of fair regulatory returns, strong cash management that allowed us to offset the impacts of Missouri River flooding, and successful financing activities that reinforce a stable credit profile. We've established a platform for growth that makes this dividend increase possible, and we're excited about this dividend action and continue to vow a competitive sustainable and increasing dividend to be an important driver for shareholder returns.

In our Analyst Day presentation we also provided an overview of our strategy with respect to renewables, including wind generation. We communicated that we had in service or contracted for 280 megawatt's of wind, and we also indicated we had an RFP out for another 220 megawatt's of wind that could be in service by the end of 2012. The RFP process yielded very attractive prices for new wind projects, and we're pleased to announce that we've entered into 2 power purchase agreements for a total of 200 megawatt's of wind. Up to 100 megawatt's may be converted to Company ownership. Jim is going to discuss the potential financial implications of these options in more detail, but we will only pursue wind ownership consistent with the parameters that we outlined during our Analyst Day presentation.

We believe the positive conditions for wind development may provide a unique opportunity for rate-based growth that is in the best interest of both our customers and our shareholders. In addition to these new wind opportunities, we've entered into a hydroelectric PPA with Central Nebraska Public Power and Irrigation District. The 10-year agreement commences in 2014 and will provide up to 63 megawatt's of power towards our Kansas renewable energy standards. So in total, these additions would increase our portfolio to approximately 600 megawatt's of clean, renewable generation, all added in just the last 6 years.

There's also a great deal of discussion in the industry over their cross-state air pollution rule, or CSAPR. The rule will require substantial near-term emission reductions in Missouri and Kansas to address air quality standards. While we support the goal of improving air quality, we advocate a sensible approach to achieving this goal. Due to the short timeline for CSAPR implementation, the industry has expressed concern about the timing for meeting the requirements. So in response, we have joined a coalition of Kansas utilities who jointly submitted a request for a stay and a request for a reconsideration of the federal implementation plans for CSAPR. As you are aware, many other utilities, states, and interested organizations have submitted similar requests.

Regardless of the outcome of the challenges, KCP&L is well positioned to meet the requirements of the new rules without having to involuntarily shut down any units. Any shortfall in allocated allowances is anticipated to be addressed through a combination of permissible allowance trading, installation of nominal emission control equipment, changes in plant processes, or purchases



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of additional power in the wholesale mark. Any compliance costs would also be covered in the \$1 billion estimate we provided during our Analyst Day presentation.

As you can see, we continue to make progress on the key elements of our strategic plan. The actions that we have taken position us well to deliver safe, reliable, and low-cost electricity to customers, while providing competitive shareholder returns. We'll continue this precise focus on execution while also maximizing opportunities as they arise. With that, I'd like to turn the call over to Terry, who will provide a more comprehensive operations and regulatory update.

Terry Bassham - *Great Plains Energy Inc - President, COO*

Thanks, Mike, and good morning, everyone. I have several operational and regulatory topics to cover with you this morning. Those are listed on page 9, slide 9. Beginning with LaCygne on slide 10, in August we received an order from the Kansas Commission on our request for pre-determination. The KCC deemed the cost estimate of \$1.23 billion excluding AFUDC and property tax, to be reasonable. KCP&L and Westar are each 50% owners of LaCygne, and as a result, KCP&L's estimated share is \$615 million, and the Kansas jurisdictional portion is about \$281 million. As a result of receiving the favorable ruling, we are proceeding with the environmental upgrades at LaCygne, which need to be in place to comply with the Kansas Department of Health and Environment's consent decree to achieve BART compliance by June 2015.

On slide 11 is an artist rendering of the environmental control equipment we plan to install at LaCygne. The project includes a wet scrubber and bag house for LaCygne 1, and what we call a full back end at LaCygne 2, consisting of a selective catalytic reduction system, or SCR, wet scrubber, bag house, and low-nox burners. We've entered into an engineering, procurement, and construction, or EPC, firm, fixed-price contract with LaCygne Environmental Partners, a joint venture of key wind power contractors company Sargent and Lundy, and have received all required air permits for initial construction. We've broken ground on the project, and construction is underway. Last month, we began preparing the foundation and expect to be in construction of the new dual-flue chimney in early 2012. As always, we will keep you posted as construction progresses.

Moving on to plant performance on slide 12, our combined fleet's overall equivalent availability factor improved 2% for the quarter compared to last year, led by our coal fleet, which was 3 percent points above the 2010 comparable period. The capacity factor for our coal units declined during the period, primarily due to coal conservation efforts undertaken during the quarter. As indicated in an 8-K filed in July, several of our coal units were impacted by Missouri River flooding. We took actions to conserve coal, given delays in deliveries at Hawthorne and LaCygne, and a suspension of deliveries at Iatan due to the flooding.

Specifically, we ran the impacted units at lower capacity levels. I'm proud of the way our employees diligently managed the impact of the flood and our coal conservation efforts during the peak summer months. In October, we ended our coal conservation efforts and the plants have resumed normal operations, and we're working to build coal inventories to normal levels, which we anticipate will happen sometime in 2012.

Wolf Creek delivered a third quarter 2011 EAF of 96%, a 4% decline from the same period in 2010. The unit came back online July 8 after the completion of an extended refueling outage. Wolf Creek's next refueling outage is scheduled to begin in the third quarter of 2012. In October, LaCygne 2 concluded a 28-day planned plan outage for maintenance inspection and Iatan 2 is currently in a planned outage that began in mid-October, and is expected to conclude around the middle of November.

Moving on to customer consumption for the quarter on slide 13, we provide detail on retail demand for the quarter. Total retail megawatt hour sales were flat, while weather-normalized sales increased 0.9% on the back of a 3.4% increase in the commercial sector, which is the best result we've seen for this customer group in several quarters. Cooling-degree days for the quarter were 11% above normal, but 7% below the comparable 2010 period. Compared to normal, the positive impact of the warm weather in 2011 quarter was about \$0.06 per share. Year-to-date, total retail megawatt hour sales have decreased 1.5% while weather-normalized sales have declined 0.9% compared to last year. However, weather has been favorable year-to-date compared to normal, resulting in a positive impact of approximately \$0.14 per share.

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On slide 14 you can see a little more detail broken down by customer sector. While we are encouraged by the weather-normalized demand for the quarter, we see signs of a still-unsettled economy and reasons for caution. There continues to be a somewhat mixed story across our 3 customer key sectors, which supports our continued view of the economy in our region as stabilizing and slowly improving.

Turning now to regulatory, as we previously indicated, our plan is to focus on reducing regulatory lag through diligent cost management by pursuing cost-recovery mechanisms when possible. As a result, we plan to file for a property tax rider in Kansas by year end with an effective date in February 2012. The property tax rider, if approved, will improve the recovery of incremental property tax costs over the next 12-month period. Also this quarter, we expect to make filings in Missouri under the Missouri Energy Efficiency Investment Act, or MEEIA. Our proposal would expand our energy efficiency efforts while providing a mechanism for fair recovery and the opportunity to earn a return on our investments. This is the next step in stabilizing and advancing energy efficiency in the state.

We continue to evaluate the best time to file our generate cases, and the decision will be made independently for each jurisdiction. As we outlined in our Analyst Day presentation, there are several factors to consider when filing a case. Our current view is we expect to file in early 2012 as needed to support our Analyst Day discussion of reducing lag to 50 basis points in 2013. Recent actions taken by the Missouri Commission signal the desire to continue working collaboratively with the state's electric utilities. Earlier this year, the commission opened a docket to look into lag created by differences in how certain elements of our business are treated in Missouri and Kansas also in late August the commission issued an order opening a case to investigate the cost of complying with federal environmental regulations. The commission's focus is on the potential impact of current and future EPA rules on Missouri's electric utilities, and specifically want to determine the potential impact on reliability and cost. They've directed the commission staff to lead a working group that will include the Office of Public Counsel, the state's Board of Utilities, investor-owned electric utilities, to investigate these impacts. The report is due no later than May 1, 2012.

Finally, before I hand the call over to Jim, I would like to briefly address transmission. We received questions recently regarding the impact of FERC Order 1000 on 2 major transmission projects in our service territory. FERC Order 1000 removes an incumbent's first right of refusal provision in transmission tariffs. While this will affect future transmission opportunities, the order does not apply to our previously approved projects. Our plan is to continue the development of our current projects, while evaluating all other options. We'll evaluate additional opportunities, but will only act if other options produce greater opportunity for our shareholders.

With that, I will now turn the call over to Jim, who will provide an update on our financials.

Jim Shay - *Great Plains Energy Inc - SVP, CFO*

Thank you Terry, and good morning, everyone. I will begin with slide 17 which provides current-year comparisons to prior year. For the quarter, Great Plains Energy's consolidated earnings were \$0.91 per share, compared with \$0.96 per share in the prior year. The \$0.05 per share decline is due to first, a negative impact of about \$0.09 per share from special factors representing costs associated with Missouri River flooding. Second, a \$0.05 per share benefit resulting from favorable weather-normalized demand, led by the commercial sector. Third, an unfavorable variance of \$0.03 per share due to weather compared to last year. Fourth, a negative impact of \$0.03 per share from regulatory lag related to higher general taxes driven by property taxes. And finally, a net favorable \$0.05 per share from other items due to new retail rates which became effective in Kansas in December 2010 and Missouri during May and June 2011, and reduced depreciation and amortization. These factors were partially offset by increased O&M expense and interest expense, plus the resolution of certain general tax-related matters.

Year-to-date earnings per share are \$1.24 compared to \$1.57 per share in the prior year. The \$0.33 year over year decline includes \$0.22 in special factors comprised of \$0.09 related to Missouri River flooding in the third quarter, \$0.13 in the first 6 months of the year, including an extended Wolf Creek outage, severance related to the organizational realignment and voluntary separation

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program, and costs associated with rate-case outcomes. The \$0.22 per share and special factors are outlined in more detail in the Appendix.

Slide 18 provides an income statement view of our third-quarter results, including \$126.1 million in net income, or \$0.91 per share, compared to \$131.6 million, or \$0.96 per share just discussed. You can see that for the quarter, the electric utility segment earned \$0.97 per share, compared to \$0.99 per share in the prior year. The \$0.02 decline is the net income impact of the key drivers that are listed on next slide. For the quarter, the Other category had a loss of \$0.06 per share, compared to a \$0.03 per share loss last year. The primary contributor to the \$0.03 increased loss was the resolution of certain general tax-related matters.

As just discussed, quarterly earnings for the electric utility segment were approximately \$2.3 million, or about \$0.02 per share lower than the prior year. I provided an overview of the main drivers impacting this segment in my earlier comments when detailing the overall \$0.05 per share decline in consolidated earnings. As shown on slide 20 for the first 9 months of 2011, Great Plains Energy's consolidated earnings were roughly \$171 million, or \$1.24 per share. This compares with the earnings of about \$215 million, or \$1.57 per share for the same period in 2010. The decline of \$0.33 in earnings per share for Great Plains Energy is in line with the decline for the electric utilities segment, from \$1.70 to \$1.37, also shown on this slide.

Slide 21 provides more details on the \$43 million, or \$0.33 per share, decline in current-year net earnings, including first, a negative impact of about \$0.22 from special factors, as previously discussed and outlined in the Appendix. Second, an estimated negative variance of \$0.04 per share from less favorable weather. Third, roughly \$0.09 of regulatory lag from new KCP&L coal transportation contract and higher property taxes. These items were partially offset by about \$0.01 per share from favorable weather-normalized demand, and \$0.01 per share from Other items, which includes new retail rates, reduced depreciation and amortization, which was offset in part by lower AFUDC equity, higher O&M expense, and higher interest expense.

Turning now to slide 22, we ended the quarter with a strong liquidity position, including approximately \$1.2 billion of available capacity on our credit lines. This compares favorably with approximately \$600 million of available capacity at the end of the third quarter. We continue to make progress in refinancing our near-term maturities and lengthening the overall duration of our long-term debt portfolio. In September, KCP&L issued \$400 million of 30-year senior notes at a coupon rate of 5.3%. Proceeds were used to repay outstanding commercial paper and will be used in part to satisfy a \$150 million maturity for 6.5% senior notes due this month. As the maturity profile at the bottom of the chart shows, we have extensive debt refinancing requirements at GMO in 2012, which is comprised of \$500 million GMO senior notes, with a coupon of 11.875% that mature in July 2012. The notes are expected to be refinanced through the re-marketing of \$287.5 million in equity units, and an estimated \$250 million long-term debt issuance by GMO or GPE.

Slide 23 contains a historical perspective of 3 key credit ratios, including the trailing 12 months ending September 30, 2011. The special factors previously discussed have impacted our earnings per share. They've also impacted our credit metrics, including FFO to adjusted debt, which is 13.3% for the last 12 months ended September 30. Although below our internal targets, it does represent a sequential improvement compared to the 12.7% reported last quarter. We are pleased to report that we met with the rating agencies in the third quarter and gave them an update on our short- and long-term outlook. While we can't comment on specifics, the overall tone of the meetings was constructive, and the agencies recognize our continued focus on credit quality.

As Mike discussed, we have entered into PPAs for 200 megawatt's of wind generation to be in service by the end of 2012. This compares to the 220 megawatt's we discussed in August. Mike also indicated the potential exists to convert up to 100 megawatt's to Company ownership. In evaluating and negotiating wind alternatives, we have maintained flexibility to allow for some level of ownership if it could be completed on attractive terms.

Any conversion to wind ownership would not change our 2012 earnings guidance range, nor our 2013 target of 50 basis points of lag from regulated operations. Any equity financing would be undertaken only if expected to be accretive within 12 to 24 months consistent with our Analyst Day discussion. Conversion to wind ownership may provide an opportunity to increase assets and rate base for the benefit of our customers to support our renewable energy initiatives.

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Finally, I wanted to wrap up with a few comments on the increase in our 2011 guidance, and the re-affirmation of our 2012 guidance and 2013 drivers. As discussed earlier, we announced year-to-date earnings that is near the top end of the \$1.10 to \$1.25 earnings guidance range we provided in August. The new range is \$1.22 to \$1.32 per share, with the main drivers of the increase being third-quarter weather that was warmer than normal, or about \$0.06 per share, and an increase in weather-normalized demand of about \$0.05 per share.

As you recall, we experienced a 2% decline in weather-normalized demand through the first 6 months of 2011. Our previous guidance assumed no load growth the last 6 months, so we were forecasting an overall decline of 1% for the year. With the 0.9% growth we saw for the third quarter, we are now forecasting a decline in weather-normalized demand for the year of 50 to 75 basis points.

One additional item regarding 2011, we estimate our 2011 actual capital expenditures will be approximately \$50 million less than the \$503 million included in our 2010 10-K. We targeted these savings to offset the cash impacts of the extended Wolf Creek outage and Missouri River flooding. We have not changed our views about 2012, and are affirming guidance of \$1.35 to \$1.55 per share. This guidance range assumes an early view of 50 to 100 basis points of growth in weather-normalized demand for 2012. We also remain focused on our 2013 target of 50 basis points of lag in regulated operations.

That concludes my comments. Thank you for your participation this morning. I will now hand the call back to Mike.

Mike Chesser - *Great Plains Energy Inc - Chairman, CEO*

Thanks, Jim. So to conclude, we hope that you can see that we've established a strong platform for delivering value to customers and shareholders. We view a competitive, sustainable, and increasing dividend as a key driver of improved shareholder returns. We have attractive investment opportunities within our service territory, and are well-positioned for growth. Finally, we have achieved constructive outcomes and have confidence in our regulatory approach, moving forward. So thank you for your attention this morning. Terry, Jim, and I at this point would be happy to answer any questions that you may have.

QUESTIONS AND ANSWERS

Operator

(Operator Instructions)

Your first question comes from the line of Erica Piserchia with Wunderlich Securities.

Erica Piserchia - *Wunderlich Securities - Analyst*

Couple questions -- I just want to make sure I'm clear on what you said with regard to your 2012 guidance, which I understand you're reiterating. So I'm trying to put that together with the comments that you mentioned on some of the wind, potentially. I think what I heard was that if you decide to go ahead with actual ownership of this, up to 100 megawatts, that would not change that guidance. Is that to say that you had something in the guidance previously for wind ownership, or --?

Mike Chesser - *Great Plains Energy Inc - Chairman, CEO*

We didn't have anything in, but it really has a de minimis impact on 2012.

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Erica Piserchia - Wunderlich Securities - Analyst

Okay. Then, with regard to your sales expectations for 2012 -- it seems like you're still kind of thinking the 50- to 150-basis-points. What is that, can you remind me what that equates in terms of a percentage volume increase?

Jim Shay - Great Plains Energy Inc - SVP, CFO

When we went into Analyst Day, we were down 2%, and so we've forecasted we'd be flat for the rest of the year and we would be down 1%. So in establishing our initial guidance range we said we thought we might get that 1% growth back. So we've seen a little bit of growth to improve our current year estimate, so we're kind of still in that same view for 2013. We'll work through our planning process, obviously, during the quarter, and tighten up the range for next year. But 1% on our retail revenue would be about \$20 million; and so 50 basis points would be about \$10 million in volume.

Mike Chesser - Great Plains Energy Inc - Chairman, CEO

To give you a little color, Erica, there has been some pickup in commercial activity in the region. I mean, we were really excited to see that Ford has decided to add a second line to their automotive plant. Cerner is a big customer that has continued to expand in the medical records area. There's increasing activity in the animal health and life sciences area, and Honeywell has a nuclear manufacturing plant south of the city that is expanding. These kinds of things we expect will ultimately lead to job growth, and as you know, residential growth typically trails commercial growth.

Erica Piserchia - Wunderlich Securities - Analyst

Sure. Just to understand that -- you had down 1% at Analyst Day, and now you're expecting some growth in that number. Is that right?

Jim Shay - Great Plains Energy Inc - SVP, CFO

Well, 1% in Analyst Day is now 50 to 100 basis points of growth. So basically, the same range of growth. We've picked up a little bit the second half of this year. We're basically kind of holding to the view we had at Analyst Day, in terms of 2012.

Erica Piserchia - Wunderlich Securities - Analyst

In terms of 2012. So there's no offset? It's not like you're expecting better growth in sales in 2012 and that there's some offset somewhere to that?

Jim Shay - Great Plains Energy Inc - SVP, CFO

Not at this point.

Mike Chesser - Great Plains Energy Inc - Chairman, CEO

We're maintaining a fairly conservative outlook.



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Erica Piserchia - *Wunderlich Securities - Analyst*

Got it. All right, thank you. Second question -- just quickly on the LaCygne order that you received in Kansas -- can you just talk us through -- I know you mentioned \$281 million of jurisdictional allocation there. Do you feel as though you're booking, I think -- CWIP there, but there's a cash impact. Are you comfortable with that cash impact relative to your expectations at Analyst Day in terms of financing and coverage ratios and all of that going forward?

Terry Bassham - *Great Plains Energy Inc - President, COO*

Absolutely, Erica. This is Terry. We had certainly been hopeful to get the rider, but are comfortable with the CWIP process. A little more lag in recovery if we have to file cases to get the CWIP treatment, but we've baked all in that in, and we're confident with our metrics, even without the rider.

Erica Piserchia - *Wunderlich Securities - Analyst*

Okay. And a last question -- on the corporate and other, you mentioned this general tax issue. Can we get a little bit more detail on what that was?

Jim Shay - *Great Plains Energy Inc - SVP, CFO*

Yes, that was a tax receivable on the books at the time of the Aquila acquisition, which has been essentially resolved or written off. So it's a non-recurring item.

Erica Piserchia - *Wunderlich Securities - Analyst*

Okay. Great, thank you very much.

Mike Chesser - *Great Plains Energy Inc - Chairman, CEO*

Thank you.

Operator

(Operator Instructions)

Your next question comes from the line of Andy Levi with Caris.

Andy Levi - *Caris & Company - Analyst*

On the wind generation, when do you think we'll hear a decision on that?

Mike Chesser - *Great Plains Energy Inc - Chairman, CEO*

We hope to have that fairly soon. We're actively pursuing that. It's just not finalized at this point in time.



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Andy Levi - Caris & Company - Analyst

Can you give us some type of range as far as what the capital investment would be?

Terry Bassham - Great Plains Energy Inc - President, COO

Well, we'd rather not. In general, we're going to be -- we'll be coming out with a press release around terms as soon as we complete the negotiations. I could give a range, but it's market, is what I would say, and we need to finalize our negotiations with them before we make a formal announcement about our vendors and our project and the final cost. So we'll be doing that quickly, though, as Mike said.

Andy Levi - Caris & Company - Analyst

And that would be financed 50% equity, 50% debt? Is that how to look at it? Or would it be a little bit different ratios?

Jim Shay - Great Plains Energy Inc - SVP, CFO

We really need to talk in terms consistent with our current capital structure. But I think the numbers should make sense.

Andy Levi - Caris & Company - Analyst

Okay. Let me see what else I got here. I think that's really it. Erica asked a bunch of good questions so I think I'm all set. Thank you very much.

Mike Chesser - Great Plains Energy Inc - Chairman, CEO

Thank you.

Operator

Your next question comes from the line of John Alli with Decade Capital.

John Alli - Decade Capital - Analyst

Great quarter. I apologize if I missed this; there's quite a bit going on this morning. Just to be clear -- load for 2012 -- what's your expectation now, in terms of growth?

Jim Shay - Great Plains Energy Inc - SVP, CFO

0.5% to 1% for next year.

John Alli - Decade Capital - Analyst

Positive. And what about 2013? Same?

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Jim Shay - Great Plains Energy Inc - SVP, CFO

No additional comments on 2013 at this point. We really don't have a range out there. As we indicated in Analyst Day, we're going to try and manage cost of service to expected volumes, and still targeting 50 basis points of regulatory lag, so we don't really have a 2013 number out there yet.

John Alli - Decade Capital - Analyst

Got you. Residential looks to be down quite a bit on a weather-normalized basis for the year. What are some of the trends that you're seeing there? Is that just energy efficiency, or is there something else?

Mike Chesser - Great Plains Energy Inc - Chairman, CEO

There's 2 things. It was down significantly in the first quarter because of a raise in the electric heat rate that was required by the Kansas commission, where we have a lot of electric heat customers. So we thought that was an aberrant quarter. The rest of the quarters have been down, I guess, somewhere around 1%, 1.5%, something like that. But as I indicated, the rise in the commercial activity that we're seeing typically precedes any rise in residential growth. So the numbers we have are conservative. There is some potential upside to them.

John Alli - Decade Capital - Analyst

Excellent. As far as the wind PPA goes, you would get a purchase pre-approved by the commission, correct?

Terry Bassham - Great Plains Energy Inc - President, COO

No, in this instance, we wouldn't necessarily go through a pre-approval process. We're executing at market terms consistent with RPS requirements, renewable requirements in those states, so I think we're confident moving forward without a pre-approval.

John Alli - Decade Capital - Analyst

Okay, great. Thanks a lot, guys.

Terry Bassham - Great Plains Energy Inc - President, COO

Thank you.

Operator

Your next question is a follow-up from the line of Andy Levy with Caris.

Andy Levi - Caris & Company - Analyst

Yes, I did actually have 1 more question. On the property tax rider that you plan to file fairly shortly, how long is the regulatory process on that?

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Terry Bassham - *Great Plains Energy Inc - President, COO*

A few months. It's a pretty straightforward process. As we've said before, we're looking at riders which were already pre-approved in form of the states, so it will take a few months to get it processed, and should be effective -- I don't know -- probably February of 2012.

Andy Levi - *Caris & Company - Analyst*

How much do you think the benefit of something like that would be to earnings?

Terry Bassham - *Great Plains Energy Inc - President, COO*

I think the delta there is a little over \$4 million.

Andy Levi - *Caris & Company - Analyst*

\$4 million. So that's, I guess, after tax. Okay, great, thank you very much.

Terry Bassham - *Great Plains Energy Inc - President, COO*

Thank you.

Operator

At this time there are no further questions, and I would like to turn the call back over to Mike Chesser for any closing remarks.

Mike Chesser - *Great Plains Energy Inc - Chairman, CEO*

Okay. Once again, thanks for your time this morning. We look forward to visiting with many of you at the EEI conference next week. I hope you have a good weekend, and go Chiefs.

Operator

This concludes today's Great Plains Energy Third Quarter 2011 Earnings Call.

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