

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of KCP&L Greater	)	
Missouri Operations Company Containing Its	)	<b><u>File No. ER-2016-0007</u></b>
Semi-Annual Fuel Adjustment Clause True-Up	)	

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Commission”), by and through counsel, and for its recommendation respectfully states:

1. On July 1, 2015, KCP&L Greater Missouri Operations Company (“GMO”) filed an application containing its thirteenth Fuel Adjustment Clause (“FAC”) true-up filing to identify the amounts of over or under-recovery of the FAC during its Recovery Period 13,<sup>1</sup> which followed its Accumulation Period 13,<sup>2</sup> as required by Commission Rules 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

2. Rule 4 CSR 240-20.090(5)(D) requires the Commission’s Staff to examine and analyze the information GMO has submitted and to submit a recommendation to the Commission not later than 30 days after GMO made its filing – in this case, no later than July 31, 2015.

3. As explained in Staff’s *Memorandum*, attached hereto as Appendix A and incorporated herein by reference, Staff recommends the Commission approve GMO’s thirteenth true-up filing for Recovery Period 13 (“RP13”), during which GMO under-

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<sup>1</sup> March 1, 2014 through February 28, 2015.

<sup>2</sup> June 1, 2013 through November 30, 2013.

recovered \$6,326<sup>3</sup> from customers in its MPS rate district, and over-recovered \$332 from customers in its L&P rate district.

4. Staff reviewed and analyzed the direct testimony of GMO witness Linda J. Nunn, the supporting schedules provided by GMO, and the monthly information GMO submitted to the Commission in accordance with 4 CSR 240-3.161(5). Staff has determined that GMO's calculations for the true-up amounts for Recovery Period 13, including the calculation of monthly interest, are correct. The under/over-recovered amounts for the MPS and the L&P rate districts, including accumulated interest, are to be included in GMO's proposed changes to its current period Fuel Adjustment Rates in its semi-annual FAC adjustment filing in File No. ER-2016-0005, which was also filed on July 1, 2015.

5. Staff has verified that GMO has filed its 2014 Annual Report and is not delinquent on any assessment. GMO is current on its submission of its Surveillance Monitoring reports as required in 4 CSR 240-20.090(10), and its monthly reports as required by 4 CSR 240-3.161(5). With the exception of GMO's proposed changes to its current period Fuel Adjustment Rates in its semi-annual FAC filing in File No. ER-2016-0005, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

**WHEREFORE**, Staff submits its analysis and recommends that the Commission approve GMO's thirteenth true-up filing for Recovery Period 13, during which GMO

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<sup>3</sup> In Case No. ER-2016-0005, GMO witness Linda J. Nunn reports a RP13 under-recovery amount of \$6,327 for MPS. In this case, the GMO FAC True Up of RP13, Case No. ER-2016-0007, GMO witness Linda J. Nunn reports an under-recovery of \$6,326 for MPS. GMO used the amount of \$6,326.632 for the RP13 under-recovery for MPS in the current FAR calculation in Case No. ER-2016-0005. Staff has reviewed the testimonies in both cases and the FAR calculation, and recommends no changes to the MPS FAR calculation provided by GMO in Case No. ER-2016-0005.

under-recovered \$6,326 from customers in its MPS rate district and over-recovered \$332 from customers in its L&P rate district, under the provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

Jeffrey A. Keevil  
Deputy Legal Counsel  
Missouri Bar No. 33825

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 526-4887 (Telephone)  
(573) 751-9285 (Fax)  
Email: jeff.keevil@psc.mo.gov

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 31st day of July 2015.

**/s/ Jeffrey A. Keevil**

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
File No. ER-2016-0007  
KCP&L Greater Missouri Operations Company

FROM: David Roos, Regulatory Economist III  
Randy Gross, Utility Regulatory Engineer I

DATE: /s/ John Rogers 07/31/2015                      /s/ Jeffrey A. Keevil 07/31/2015  
Energy Resource Analysis Unit / Date              Staff Counsel's Office / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning KCP&L Greater Missouri Operations Company's Thirteenth Fuel Adjustment Clause True-up Filing Under the Provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: July 31, 2015

### Recommendation

Staff recommends the Commission approve KCP&L Greater Missouri Operations Company's ("GMO") thirteenth true-up filing for Recovery Period 13 during which GMO under-recovered \$6,326 from customers in its MPS rate district, and over-recovered \$332 from customers in its L&P rate district.

### Discussion

On July 1, 2015, GMO filed with the Commission, along with direct testimony and supporting schedules of GMO witness Linda J. Nunn, its thirteenth fuel adjustment clause ("FAC") true-up filing under the provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5). According to GMO's true-up filing, in the aggregate, GMO under-recovered from its customers in its MPS rate district \$6,326<sup>1,2</sup> and over-recovered from its customers in its L&P rate district \$332, during Recovery Period 13

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<sup>1</sup> As defined on KCP&L Greater Missouri Operations Company, P.S.C.MO. No. 1, Original Sheet No. 126.2 the term T = The true-up amount shall be the difference between the revenues billed and the revenues authorized for collection during the RP as well as any corrections identified to be included in the current Fuel Adjustment Rate filing. Any corrections included will be discussed in the testimony accompanying the true-up filing.

<sup>2</sup> In Case No. ER-2016-0005, GMO witness Linda J. Nunn reports a RP13 under-recovery amount of \$6,327 for MPS. In the GMO FAC True Up of RP 13, Case No. ER-2016-0007, GMO witness Linda J. Nunn reports an under-recovery of \$6,326 for MPS. GMO used the amount of \$6,326.632 for the RP13 under-recovery for MPS in the current FAR calculation in Case No. ER-2016-0005. Staff has reviewed the testimonies in both cases and the FAR calculation, and recommends no changes to the MPS FAR calculation provided by GMO in Case No. ER-2016-0005.

(March 1, 2014 through February 28, 2015) which followed its Accumulation Period 13 (June 1, 2013 through November 30, 2013).

The Missouri Public Service Commission Staff (“Staff”) reviewed the direct testimony of GMO witness Linda J. Nunn, the supporting schedules GMO provided with GMO’s application in this case, and the monthly information GMO submitted to the Commission in accordance with 4 CSR 240-3.161(5).

Based on its review and analysis of the information GMO filed and submitted for Recovery Period 13, Staff has determined that GMO’s calculations for the true-up amounts for Recovery Period 13, including the calculation of monthly interest, are correct. Staff recommends the Commission approve GMO’s thirteenth true-up filing for Recovery Period 13 during which GMO under-recovered \$6,326 from its customers in its MPS rate district and over-recovered \$332 from its customers in its L&P rate district. The under/over-recovered amounts for the MPS and L&P rate districts, respectively, including accumulated interest, are to be included in GMO’s proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2016-0005 filed on July 1, 2015, for Accumulation Period 16 (December 1, 2014 through May 31, 2015).

Staff has verified that GMO has filed its 2014 Annual Report and is not delinquent on any assessment. GMO is current on its submission of its Surveillance Monitoring reports as required by 4 CSR 240-20.090(10), and its monthly reports as required by 4 CSR 240-3.161(5). With the exception of GMO’s proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2016-0005, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.



**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of	)	
KCP&L Greater Missouri Operations	)	File No. ER-2016-0007
Company Containing Its Semi-Annual	)	
Fuel Adjustment Clause True-Up	)	

**AFFIDAVIT OF DAVIC C. ROOS**

**STATE OF MISSOURI**     )  
                                      ) ss  
**COUNTY OF COLE**     )

COMES NOW David C. Roos and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Staff Recommendation in Memorandum Form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
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David C. Roos

Subscribed and sworn to before me this 31<sup>st</sup> day of July, 2015.

SUSAN L. SUNDERMEYER  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Callaway County  
My Commission Expires: October 28, 2018  
Commission Number: 14942086

  
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Notary Public