

**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 Semi-Annual Fuel Adjustment Clause True-Up)
) **File No. ER-2016-0164**
)

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 December 30, 2015, KCP&L Greater Missouri Operations Company (“GMO”) filed an application containing its fourteenth Fuel Adjustment Clause (“FAC”) true-up filing to identify the amounts of over or under-recovery of the FAC for its most recently completed 12-month recovery period, Recovery Period 14,¹ 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 January 29, 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 fourteenth true-up filing for Recovery Period 14, during which GMO under-recovered \$867,009 from customers in its MPS rate district, and under-recovered \$138,762 from customers in its L&P rate district.

¹ September 1, 2014 through August 31, 2015.

4. Staff reviewed and analyzed the direct testimony, supporting schedules and workpapers of GMO witness Linda J. Nunn. Staff has determined that GMO's calculations for the true-up amounts for Recovery Period 14 are correct. The under-recovered amounts for the MPS and the L&P rate districts, including accumulated interest, are to be included in GMO's calculation of its proposed current period Fuel Adjustment Rates in its semi-annual FAC adjustment filing in File No. ER-2016-0165.²

5. Staff has verified that GMO has filed its 2015 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 annual Fuel Adjustment Rates in its semi-annual FAC filing in File No. ER-2016-0165, 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 fourteenth true-up amounts, \$867,009 from customers in its MPS rate district, and \$138,762 from customers in its L&P rate district, for Recovery Period 14 under the provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

² *In the Matter of KCP&L Greater Missouri Operations Company for Authority to Implement Rate Adjustments Required by 4 CSR 240-20.090(4) and the Company's Approved Fuel and Purchased Power Cost Recovery Mechanism* filed on December 30, 2015. In this case, GMO requested Commission approval of a revised tariff sheet to adjust rates for the FAC includable costs experienced during the six-month accumulation period (Accumulation Period 17) June 1, 2015 through November 30, 2015.

Respectfully Submitted,

/s/ Jacob Westen

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 29th day of January, 2016, to all counsel of record.

/s/ Jacob Westen

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2016-0164
KCP&L Greater Missouri Operations Company

FROM: Matthew J. Barnes, Utility Regulatory Auditor IV
David C. Roos, Regulatory Economist III

DATE: /s/ John A. Rogers 01/29/2016 /s/ Jacob Westen 01/29/2016
Energy Resources Department/Date Staff Counsel Department / Date

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

DATE: January 29, 2016

Recommendation

Staff recommends the Commission approve KCP&L Greater Missouri Operations Company's ("GMO") fourteenth true-up filing for Recovery Period 14 during which GMO under-recovered \$867,009 from customers in its MPS rate district, and under-recovered \$138,762 from customers in its L&P rate district.

Discussion

On December 30, 2015, GMO filed with the Commission, along with direct testimony and supporting schedules of GMO witness Linda J. Nunn, its fourteenth 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 \$867,009¹ and under-recovered from its customers in its L&P rate district \$138,762, during Recovery Period 14 (September 1, 2014 through August 31, 2015) which followed its Accumulation Period 14 (December 1, 2013 through May 31, 2014).

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

¹ 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.

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 14, Staff has determined that GMO's calculations for the true-up amounts for Recovery Period 14, including the calculation of monthly interest, are correct. Staff recommends the Commission approve GMO's fourteenth true-up filing for Recovery Period 14 during which GMO under-recovered \$867,009 from its customers in its MPS rate district and under-recovered \$138,762 from its customers in its L&P rate district. The under-recovered amounts for the MPS and L&P rate districts 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-2016-0165 filed on December 30, 2015, for Accumulation Period 17 (June 1, 2015 through November 30, 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-2016-0165, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.


Notary Public

**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	)	File No. ER-2016-0164
Semi-Annual Fuel Adjustment	)	
Clause True-Up	)	

AFFIDAVIT OF DAVID C. ROOS

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

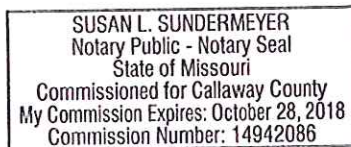
COMES NOW David C. Roos and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Staff Recommendation in Memorandum form; and that the same is true and correct according to his best knowledge and belief.

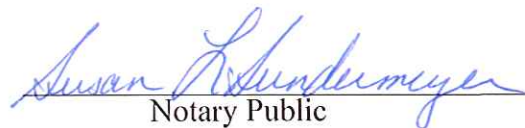
Further the Affiant sayeth not.



David C. Roos

Subscribed and sworn to before me this 29th day of January, 2016.





Notary Public