

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

In the Matter of KCP&L Greater Missouri)	
Operations Company's Request for Variance)	<u>File No. ET-2014-0028</u>
from Portions of 4 CSR 240-20.065)	Tracking No. YE-2014-0214

**STAFF RECOMMENDATION TO APPROVE KCP&L GREATER MISSOURI
OPERATIONS COMPANY'S TARIFF SHEETS FILED TO COMPLY WITH THE
COMMISSION'S ORDER APPROVING STIPULATION AND AGREEMENT AND TO
GRANT MOTION FOR EXPEDITED TREATMENT**

COMES NOW Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and submits this Staff Recommendation to the Missouri Public Service Commission ("Commission"). In support of its Recommendation, Staff respectfully states the following:

1. KCP&L Greater Missouri Operations Company ("GMO") filed tariff sheets on November 8, 2013, to comply with the Commission's October 30, 2013 *Report and Order* approving a Non-Unanimous Stipulation and Agreement ("Stipulation") that addressed changes in ownership of solar renewable energy credits and changes to GMO's net metering interconnection tariff sheets required under House Bill 142.

2. The Commission's Energy Unit – Tariffs/Rate Design, Economic Analysis and Energy Resource Analysis Staff ("Staff") has reviewed the tariff sheets filed on November 8, 2013, and is of the opinion that these tariff sheets accord with the specimen tariff sheets contained in the Stipulation and approved by the Commission's *Report and Order* as explained in Staff's Memorandum, attached hereto as Appendix A.

3. With the November 8th filing of its compliance tariffs, GMO also filed a Motion For Expedited Treatment. As agreed upon under the Stipulation and approved by the Commission, the Staff does not oppose GMO's request for expedited approval. In addition, good cause exists for approval of these tariff sheets under Section 393.140(11) RSMo 2000 because they bring the company into compliance with the provisions of HB 142 which were effective August 28, 2013.

4. Staff has verified GMO has filed its calendar year 2012 Annual Report and is not delinquent on any assessment.

WHEREFORE, Staff prays the Commission accept its Recommendation and issue an order approving the following tariff sheets as filed on November 8, 2013, to become effective on November 18, 2013, the requested effective date:

P.S.C. MO. No. 1

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- 5th Revised Sheet No. 110, Canceling 4th Revised Sheet No. 110
 - 1st Revised Sheet No. 110.1, Canceling Original Sheet No. 110.1
 - 5th Revised Sheet No. 111, Canceling 4th Revised Sheet No. 111
 - 4th Revised Sheet No. 112, Canceling 3rd Revised Sheet No. 112
 - 5th Revised Sheet No. 113, Canceling 4th Revised Sheet No. 113
 - 4th Revised Sheet No. 114, Canceling 3rd Revised Sheet No. 114
 - 4th Revised Sheet No. 115, Canceling 3rd Revised Sheet No. 115
 - 2nd Revised Sheet No. 116, Canceling 1st Revised Sheet No. 116
 - 4th Revised Sheet No. 117, Canceling 3rd Revised Sheet No. 117
 - 4th Revised Sheet No. 118, Canceling 3rd Revised Sheet No. 118
 - 1st Revised Sheet No. 119.2, Canceling Original Sheet No. 119.2
 - 1st Revised Sheet No. 119.4, Canceling Original Sheet No. 119.4
 - 1st Revised Sheet No. 119.6, Canceling Original Sheet No. 119.6
 - 1st Revised Sheet No. 119.7, Canceling Original Sheet No. 119.7
 - 1st Revised Sheet No. 119.8, Canceling Original Sheet No. 119.8
 - 1st Revised Sheet No. 119.9, Canceling Original Sheet No. 119.9
 - 2nd Revised Sheet No. R-62.20, Canceling 1st Revised Sheet No. R-62.20
 - 1st Revised Sheet No. R-62.21, Canceling Original Sheet No. R-62.21

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin

Senior Counsel

Missouri Bar No. 51709

Attorney for the Staff of the

Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically on this 13th day of November, 2013 to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. ET-2014-0028 / File No. YE-2014-0214 – KCP&L Greater Missouri
Operations Company

FROM: Thomas M. Imhoff, Tariffs/Rate Design - Energy

/s/ Thomas M. Imhoff 11/13/13
Energy Unit / Date

/s/ Robert S. Berlin 11/13/13
Staff Counsel's Office / Date

SUBJECT: Staff Recommendation to Approve KCP&L Greater Missouri Operations' Tariff
Sheets Filed to Comply with the Commission's Order Approving Stipulation and
Agreement And A Motion For Expedited Treatment

DATE: November 13, 2013

On October 30, 2013, the Missouri Public Service Commission ("Commission") issued its Report and Order ("Order") in Case No. ET-2014-0028, approving KCP&L Greater Missouri Operations Company's ("GMO") Non-Unanimous Stipulation and Agreement ("Stipulation"). GMO's Stipulation addressed changes in the ownership of solar renewable energy credits and changes to GMO's net metering interconnection tariff sheets required by the passage of House Bill 142. GMO also filed a Motion for Expedited Treatment ("Motion") for its tariff sheets to become effective on November 18, 2013.

GMO filed tariff sheets on November 8, 2013, to comply with the Order. In an accompanying motion, GMO requested the Commission to act on an expedited basis to approve the tariff sheets to become effective on November 18, 2013, which is less than the statutory standard 30-day period. GMO's Motion is based in part "... since all of the parties have already reviewed and approved the tariff sheets.", and that no harm will come to the general public if this motion is granted. In addition, the Staff and the signatories to the Stipulation agreed to not oppose GMO's request for expedited approval.

The Commission's Energy Unit – Tariffs/Rate Design, Economic Analysis and Energy Resource Analysis Staff ("Staff") has reviewed the tariff sheets filed on November 8, 2013, and is of the opinion that they comply with the Commission's Order. Staff is also of the opinion that good cause exists for the Commission to approve these tariff sheets on less than thirty days' notice because all signatories to the case have had the opportunity to review and approve these tariff sheets for compliance with the specimen tariff sheets contained in the Stipulation and have agreed to not oppose expedited approval. Therefore, Staff recommends the Commission issue an order approving the following tariff sheets as filed on November 8, 2013, to become effective on November 18, 2013, the requested effective date:

P.S.C. MO. No. 1

5th Revised Sheet No. 110, Canceling 4th Revised Sheet No. 110

1st Revised Sheet No. 110.1, Canceling Original Sheet No. 110.1

5th Revised Sheet No. 111, Canceling 4th Revised Sheet No. 111

Appendix A

OFFICIAL CASE FILE MEMORANDUM

PAGE 2 OF 2

4th Revised Sheet No. 112, Canceling 3rd Revised Sheet No. 112
5th Revised Sheet No. 113, Canceling 4th Revised Sheet No. 113
4th Revised Sheet No. 114, Canceling 3rd Revised Sheet No. 114
4th Revised Sheet No. 115, Canceling 3rd Revised Sheet No. 115
2nd Revised Sheet No. 116, Canceling 1st Revised Sheet No. 116
4th Revised Sheet No. 117, Canceling 3rd Revised Sheet No. 117
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1st Revised Sheet No. 119.9, Canceling Original Sheet No. 119.9
2nd Revised Sheet No. R-62.20, Canceling 1st Revised Sheet No. R-62.20
1st Revised Sheet No. R-62.21, Canceling Original Sheet No. R-62.21

The Staff has verified that GMO has filed its annual report and is not delinquent on any assessment. The 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

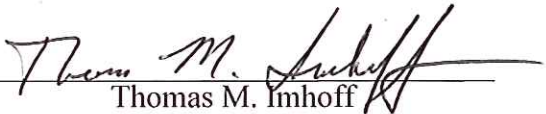
In the Matter of KCP&L Greater Missouri)
Operations Company's Request for Variance)
from Portions of 4 CSR 240-20.065)

File No. ET-2014-0028

AFFIDAVIT OF THOMAS M. IMHOFF

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Thomas M. Imhoff, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.


Thomas M. Imhoff

Subscribed and sworn to before me this 13th day of November, 2013.




Notary Public