

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of KCP&L Greater Mis-)
souri Operations Company's Submis-) File No. EO-2014-0290
sion of its 2013 Renewable Energy)
Standard Compliance Report)

**MOTION TO COMPEL RESPONSES TO DATA REQUESTS
OF AG PROCESSING INC A COOPERATIVE**

1. On April 15, 2014 KCP&L Greater Missouri Operations Company ("GMO") submitted its 2013 Annual Renewable Energy Standard Compliance Report purportedly pursuant to Commission Rule 4 CSR 240-20.100.

2. On May 2, 2014 AG Processing Inc a Cooperative ("AGP") filed an Application to Intervene. No response was filed and AGP's intervention was granted on May 13, 2014. On May 6, 2014 intervention was also granted to Missouri Solar Energy Industries Association "MOSEIA"), Earth Island Institute d/b/a Renew Missouri ("Renew"), and to Missouri Industrial Energy Consumers ("MIEC").

3. Comments are due per Commission Order on June 30, 2014.

4. On May 27, 2014 AGP submitted data requests Nos. 1-20 inclusive to GMO pertinent to its Report. A copy of these data requests is attached.

5. Pursuant to Commission Rule 4 CSR 240-2.090 GMO was obligated to object within ten days to the data requests or

seek additional time within which to respond beyond the 20 days allowed by the same Rule.


6. No objection to any of the data requests has been received. No responses been received.

7. AGP seeks an order from the Commission compelling GMO to respond. AGP stands ready to engage in the golden rule and other processes referenced in Rule 4 CSR 240-2.090. Given, however, GMO's failure to timely advise AGP of any objection or dispute regarding the data requests, such processes likely would have been unproductive. Moreover, the shortage of time suggests that this matter be brought before the Commission.

WHEREFORE an order is respectfully sought compelling GMO to respond.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



Stuart W. Conrad Mo. Bar #23966
3100 Broadway, Suite 1209
Kansas City, Missouri 64111
(816) 753-1122
Facsimile (816)756-0373
Internet: stucon@fcplaw.com

ATTORNEYS FOR AG PROCESSING INC.

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing on the designated attorneys or representatives of each party in accord with Commission Orders and the service list maintained in this proceeding by the Secretary of the Commission on EFIS.

Dated: June 27, 2014

A handwritten signature in black ink, appearing to read "Stuart W. Conrad", written over a horizontal line.

Stuart W. Conrad, an attorney for
within applicant

KCP&L GREATER MISSOURI OPERATIONS CO.

EO-2014-0290

Data Request
of
Ag Processing Inc a Cooperative
to

KCP&L GMO

May 27, 2014

<u>Item No.</u>	<u>Description</u>
1.	Please provide a copy of the GMO responses to the data requests of all other parties, including the data requests themselves and including but not limited to all initial responses and all updates, corrections, or supplements thereto.

The attached or above information provided to the requesting party or parties in response to this data or information request is accurate and complete and contains no material misrepresentations or omissions, based upon present facts to the best of the knowledge, information or belief of the undersigned. The undersigned agrees to immediately inform the requesting party or parties if during the pendency of this case any matters are discovered which would materially affect the accuracy or completeness of the attached information and agrees to regard this as a continuing data request.

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<u>Item No.</u>	<u>Description</u>
2.	Please provide a copy of the GMO workpapers associated with the Report.

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<u>Item No.</u>	<u>Description</u>
3.	Please explain in detail the method used to value the St. Joe Landfill Gas at \$349,827 as reported in Section 2.4.

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<u>Item No.</u>	<u>Description</u>
4.	For the St. Joe Landfill Gas facility, please identify all costs and benefits that went into the fuel adjustment mechanism.

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<u>Item No.</u>	<u>Description</u>
5.	For the St. Joe Landfill Gas facility, what was the plant in service and accumulated depreciation as of 12/31/2012 and as of 12/31/2013

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<u>Item No.</u>	<u>Description</u>
6.	For the St. Joe Landfill Gas facility, what were the operating expenses during 2013.

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<u>Item No.</u>	<u>Description</u>
7.	Please identify and provide each other per books balance sheet amount and expense amount associated with the St. Joe Landfill Gas facility during 2013.

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<u>Item No.</u>	<u>Description</u>
8.	Please identify each element of cost recovery associated with the St. Joe Landfill Gas facility that is included in the present rates of GMO and provide either that actual amount or the best available estimate of amount of rate recover of each for 2013.

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<u>Item No.</u>	<u>Description</u>
9.	Regarding Report Section 2.5, please state separately the cost of RECs and S-RECs Acquired , Sold, and Re-tired including price paid/received and administrative costs, if any.

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<u>Item No.</u>	<u>Description</u>
10.	Please explain how the price was determined for each REC and S-REC book entry.

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<u>Item No.</u>	<u>Description</u>
11.	Regarding Report Section 2.12, what are the S-RECs expected to be received i) during 2014, ii) during 2015, and iii) during 2016 for each contract? At what cost for each facility, per year.

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<u>Item No.</u>	<u>Description</u>
12.	Regarding Report Section 2.13, Please explain fully the statement: "Compliance for 2013 was under the 1% cap."

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<u>Item No.</u>	<u>Description</u>
13.	Regarding Report Section 2.13, Please provide workpapers.

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<u>Item No.</u>	<u>Description</u>
14.	Regarding Report Section 2.13, Please reconcile the compliance statement with Schedule TMR-3 submitted in Docket EO-2014-0151 that appears to show cost of \$27,772,754.34, a 1% cap of \$7,582,117.18, and the cost set forth in Report Section 2.13 of \$24,245,607, \$21,427, \$38,858, and \$876,013.

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<u>Item No.</u>	<u>Description</u>
15.	Regarding Report Section 2.13, please define each cost included in "compliance costs."

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<u>Item No.</u>	<u>Description</u>
16.	Are any costs associated with net metering included in compliance costs? Please explain why or why not.

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<u>Item No.</u>	<u>Description</u>
17.	Regarding Report Section 2.13, is it the contention of GMO that only "compliance costs" are recoverable from ratepayers? Please explain why or why not.

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<u>Item No.</u>	<u>Description</u>
18.	Regarding Report Section 2.13, please reconcile the statement: "Compliance for 2013 was under the 1% cap." with the statement "Full cost recovery would greatly exceed the 1% cap" that appears on Schedule TMR-3 in Docket EC-2014-0151. Please explain fully.

The attached or above information provided to the requesting party or parties in response to this data or information request is accurate and complete and contains no material misrepresentations or omissions, based upon present facts to the best of the knowledge, information or belief of the undersigned. The undersigned agrees to immediately inform the requesting party or parties if during the pendency of this case any matters are discovered which would materially affect the accuracy or completeness of the attached information and agrees to regard this as a continuing data request.

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<u>Item No.</u>	<u>Description</u>
19.	Assuming that the RESRAM is approved as proposed, please provide an estimate of the year end RES recoverable cost balances as of yearend 2014 through 2025. Please provide workpapers and state relevant assumptions.

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<u>Item No.</u>	<u>Description</u>
20.	Please identify each cost of compliance that was being recovered in rates during some or all of 2013 and please provide the actual cost, and if that is not available, an estimate of the actual cost for the year 2013.

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