

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

In the Matter of Seventh Prudence Review)	
Of Costs Subject to the Commission-Approved)	Case No. EO-2017-0232
Fuel Adjustment Clause of KCP&L Greater)	
Missouri Operations Company)	

**KCP&L GREATER MISSOURI OPERATIONS COMPANY’S REPLY
TO THE OFFICE OF PUBLIC COUNSEL’S RESPONSE
TO STAFF PRUDENCE REVIEW REPORT**

COMES NOW KCP&L Greater Missouri Operations Company (“GMO” or “Company”), and for its reply to the Office of Public Counsel’s (“OPC”) *Response to Staff’s Prudence Review Report and Results of OPC’s Limited Fuel and Purchased Power Adjustment Clause Prudence Review* (“OPC Response”), states as follows:

1. On March 8, 2017, the Commission Staff (“Staff”) filed a plan for examining and analyzing the costs and revenues associated with GMO’s Commission approved fuel adjustment clause (“FAC”) for the period June 1, 2015 to November 30, 2016 (the “Review Period”). In a March 10, 2017 Order, the Commission established an August 28, 2017 due date for the Staff’s FAC audit report and a September 7, 2017 deadline for a hearing request on Staff’s FAC audit. The Commission also established a procedure for discovery by auditing parties which included a procedure for suspending or extending the audit process should an auditing party file a motion to compel with the Commission that asserted that GMO failed to timely provide required information. The Company timely responded to all Staff and OPC data requests. No motion to compel discovery responses was filed by any auditing party.

2. On August 28, 2017, the Staff filed its report finding no evidence of imprudence in the Review Period. The OPC Response does not contest Staff’s finding and OPC agrees that during the Review Period, customers were not harmed by GMO’s actions. Yet OPC asks the

Commission to hold the docket open for additional filings by OPC examining GMO's level of reliance on the Southwest Power Pool Integrated Market ("SPP IM") since March 2014. OPC did not request a hearing from the Commission.

3. The Commission should deny OPC's request. The Staff's analysis of the Review Period is complete and OPC has not contested Staff's findings nor requested a hearing. OPC has other forums available, including the next FAC audit, to raise any issues regarding the Company's participation in the SPP IM and the Company's plans to retire generation units. In fact, OPC has indicated that it intends to raise its issue as a "special contemporary issue" in docket EO-2018-0045. The special contemporary issues are due to be filed on September 15, 2017. Therefore, the Commission should close this docket.

WHEREFORE, GMO requests the Commission consider its Reply to the OPC Response.

Respectfully submitted,

/s/ Roger W. Steiner

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 14th day of September, 2017.

/s/ Roger W. Steiner

Roger W. Steiner