

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of KCP&L Greater Missouri Operations Company's Submission of its 2014 Renewable Energy Standard Compliance Plan)
)
) File No. EO-2014-0288
)

**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 2014 Annual Renewable Energy Standard Compliance Plan 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 30, 2014 MOSEIA submitted comments on GMO's filing.

5. On June 3, 2014 AGP submitted data requests Nos. 32-40 inclusive to MOSEIA pertinent to the comments that had been submitted. A copy of these data requests is attached.

6. Pursuant to Commission Rule 4 CSR 240-2.090 MOSEIA 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.

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

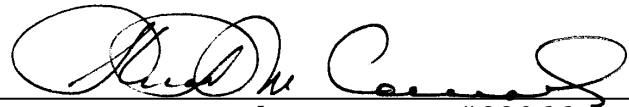
8. AGP seeks an order from the Commission compelling MOSEIA to respond to its data requests.

9. Shortly after submitting the data requests, Counsel for AGP received a telephone call from counsel for Renew Missouri claiming representation of MOSEIA regarding the data requests. AGP Counsel was advised that they would not be answered citing financial reasons. This matter is therefore brought before the Commission.

WHEREFORE an order is respectfully sought compelling MOSEIA to respond.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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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-2014-0288

Data Request
of
Ag Processing Inc a Cooperative
to

Missouri Solar Energy Industries Association (MOSEIA)

June 3, 2014

<u>Item No.</u>	<u>Description</u>
32.	Please provide the citation for the revenue requirement amount referenced in paragraph 3 of MOSEIA's comments.

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.

As used in this request the term "document" includes publications in any format, work papers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data recordings, transcriptions and printer, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to the party to whom this request is tendered and named above and includes its employees, contractors, agents or others employed by or acting in its behalf.

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EO-2014-0288

Data Request
of
Ag Processing Inc a Cooperative
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Missouri Solar Energy Industries Association (MOSEIA)

June 3, 2014

<u>Item No.</u>	<u>Description</u>
33.	How much has been spent to date on RES compliance by GMO? Please provide a copy of any workpapers supporting your calculation.

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June 3, 2014

<u>Item No.</u>	<u>Description</u>
34.	If MOSEIA has an estimate of the amount spent to date on RES compliance what is the estimated amount? Please provide a copy of workpapers. If MOSEIA has no such estimate please so state.

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<u>Item No.</u>	<u>Description</u>
35.	Please state how the amounts spent on RES compliance to date should be considered when evaluating the impact of the 1% rate impact calculation in the current RES Plan. If amounts spent to date should not be considered, please explain why not.

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June 3, 2014

<u>Item No.</u>	<u>Description</u>
36.	Is it MOSEIA's position that an additional amount should be spent by GMO on RES compliance during the 2014-2016 plan period, regardless of whether or not customer rates would increase by more than 1% above what they would have been if GMO continued to generate or purchase electricity from entirely nonrenewable sources, taking into proper account future environmental regulatory risk including the risk of greenhouse gas regulation? Please explain fully.

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June 3, 2014

<u>Item No.</u>	<u>Description</u>
37.	Please provide MOSEIA's estimate by year of GMO revenues assuming GMO continued to generate or purchase electricity from entirely nonrenewable sources, taking into proper account future environmental regulatory risk including the risk of greenhouse gas regulation? Please provide a copy of workpapers. Please explain fully.

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<u>Item No.</u>	<u>Description</u>
38.	Assuming that GMO were to spend the additional as referenced in MOSEIA's comments paragraph 5, what is the MOSEIA recommendation as to how and when these monies would be recovered from ratepayers? Please provide a copy of workpapers and explain fully.

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<u>Item No.</u>	<u>Description</u>
39.	Does MOSEIA recommend that these additional costs be amortized for collection from ratepayers over a period of time? If so, what time period? If so, what carrying costs should be charged to customers, if any?

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<u>Item No.</u>	<u>Description</u>
40.	Assuming that GMO were to spend the additional amount referenced in MOSEIA's comments paragraph 5, and assuming recovery of monies as recommended by MOSEIA, please provide by year the amounts to be recovered from customers. Please include recovery of all costs in your response and separately include any carrying costs MOSEIA proposes.

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