

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

In the Matter of KCP&L Greater Missouri)	
Operations Company's Tariffs Changing the)	<u>File No. HT-2018-0293</u>
Steam QCA For Service Provided to)	Tariff Tracking No. YH-2019-000
Customers in its Service Territory)	

STAFF RECOMMENDATION TO APPROVE TARIFF SHEET

COMES NOW the Staff of the Public Service Commission of Missouri and, for its Staff Recommendation to Approve Tariff Sheet, states:

1. On July 16, 2018, KCP&L Greater Missouri Operations Company (“GMO”) filed with the Commission one tariff sheet, 37th Revised Sheet No. 6.10 bearing an effective date of September 1, 2018, to add the quarterly cost adjustment (“QCA”) for steam service customers for the second quarter of calendar year 2018.

2. GMO's filing includes the proposed tariff sheet and supporting workpapers consisting of electronic worksheets showing its calculation of the QCA. The proposed tariff sheet reflects a customer credit per million British Thermal Units (“BTU”) of \$(1.7550)¹ as compared to a customer credit of \$(1.6972) per million BTU reflected on the previous 36th Revised Sheet No. 6.10. The change resulting from this filing causes more of a customer credit in the QCA Rider rate and is the result of the net effect of:

- 1) a \$115,783 decrease in the quarterly adjusted fuel costs when compared to the same quarter last year, and
- 2) an increase of the Reconciliation Rate (R Factor) component of \$37,759.

¹ A “(bracketed amount)” represents a credit to the customer. The credit is also sometimes referred to as a “negative charge” as reflected by the brackets. In this instance, the customer will receive a credit in the amount of \$1.7550 per million BTU.

3. For a steam service customer, this would mean a decrease of approximately \$57.80 for every thousand MMBTUs used. As more fully explained in its Memorandum, attached hereto as Appendix A, the Staff has reviewed the data and calculations provided by GMO related to its proposed tariff sheet and has determined that it is correct and satisfies the standards set forth in GMO's Tariff Sheet Nos. 6.6 through 6.10.

4. Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing. Staff's recommendation for approval of the QCA change in this case is solely based on the accuracy of GMO's calculations and is not indicative of the prudence of the fuel costs included in the QCA.

WHEREFORE, for the reasons discussed above and in Staff's Memorandum, the Staff recommends the Commission either issue an order approving the proposed tariff sheet as filed by GMO on July 16, 2018, to go into effect September 1, 2018, or to allow it to go into effect by operation of law that same date:

P.S.C. MO. No. 1

37th Revised Sheet No. 6.10 Canceling 36th Revised Sheet No. 6.10

Respectfully Submitted,

/s/ Robert S. Berlin

Robert S. Berlin

Deputy Staff Counsel

Missouri Bar No. 51709

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 7th day of August, 2018.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. HT-2018-0293, Tariff Tracking No. YH-2019-0003
KCP&L Greater Missouri Operations Company

FROM: Michael Stahlman, Regulatory Economist III

/s/ Robin Kliethermes 8/7/2018 /s/ Bob Berlin 8/7/2018
Mngr. Tariff and Rate Design Dept. / Date Staff Counsel Department / Date

SUBJECT: Staff Recommendation to Approve the Tariff Sheet Filed to Add the Quarterly Cost Adjustment for the Second Quarter of 2018 to the Quarterly Cost Adjustment Rider – Steam of KCP&L Greater Missouri Operations Company to go into effect on September 1, 2018, or to go into effect by operation of law that same date.

DATE: August 7, 2018

On July 16, 2018, KCP&L Greater Missouri Operations Company (“GMO”) filed with the Commission one (1) tariff sheet for steam service to add the quarterly cost adjustment (“QCA”) for the second quarter of 2018. The adjustment is required by GMO’s Quarterly Cost Adjustment Rider, which the Commission approved in Case No. HR-2005-0450, and modified in Case Nos. HR-2009-0092 and HR-2010-0028.

GMO’s filing included the proposed tariff sheet and supporting workpapers consisting of electronic worksheets showing GMO’s calculation of the QCA for the second quarter of 2018.

On July 18, 2018, the Commission directed Staff to file a recommendation on the pending tariff no later than August 7, 2018.

The procedure for the calculation of the QCA for steam service sales is set out in GMO’s Tariff Sheet Nos. 6.6 through 6.10, which are titled “Quarterly Cost Adjustment Rider – Steam.” The QCA calculation components as described in Tariff Sheet Nos. 6.6 and 6.7 include the Current Quarterly Cost Adjustment (“CQCA”), the Reconciliation Rate (“R factor”) plus any applicable reconciling adjustments. Additionally, Tariff Sheet 6.8 includes Coal Performance Standards.

The QCA Rider for this 37th revision of Tariff Sheet No. 6.10 reflects a negative charge per million British Thermal Units (“BTU”) of (\$1.7550) as compared to a negative charge per million BTU of (\$1. 6972) that was reflected on the previous revision of Tariff Sheet No. 6.10. For a steam service customer, this would mean a decrease of approximately \$57.80 for every thousand MMBTUs used. The QCA Rider negative charge is a reduction to customer bills’ to reflect the customer share of the variation in fuel cost for the most recent quarter. The QCA Rider rate reflects a decrease of \$115,783 in the quarterly adjusted fuel costs when compared to the same quarter last year. The R factor component reflects an increase of \$37,759 when compared to the same quarter last year.

Staff reviewed the data and mathematical calculations GMO provided in its worksheets and found GMO’s calculations related to the filed tariff sheet to be correct, and that the calculations

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satisfy the standards set forth in GMO's Tariff Sheet Nos. 6.6 through 6.10. The calculations are also consistent with previous GMO QCA filings.

Staff Recommendation

Staff has reviewed the filed tariff sheet and recommends approval of the following tariff sheet to go into effect for service on and after September 1, 2018, the requested effective date:

P.S.C. MO. No. 1

37th Revised Sheet No. 6.10 Canceling 36th Revised Sheet No. 6.10

Staff has verified that GMO is not delinquent on any assessment and has filed its Annual Report. 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). Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing. Staff's recommendation for approval of the QCA change in this case is solely based on the accuracy of GMO's calculations, R factor adjustments, and an adjustment for Coal Performance Standards outlined and is not indicative of the prudence of the fuel costs included in the QCA.

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

In the Matter of KCP&L Greater Missouri Operations)
Company's Tariffs Changing The Steam QCA For)
Service Provided to Customers in Its Service Territory)
Case No. HT-2017-0293
Tracking No. JH-2017-0201

AFFIDAVIT OF MICHAEL L. STAHLMAN

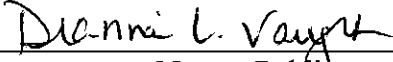
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW, Michael L. Stahlman, 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.


_____ Michael L. Stahlman

Subscribed and sworn to be this 7th day of August, 2018.


_____ Notary Public

