

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

In the matter of KCP&L Greater Missouri Operations)	<u>File No. HT-2011-0343</u>
Company, for Authority to File Tariffs Changing the)	YH-2012-0159
Steam QCA for Service Provided to Customers in its)	
Service Territory)	

INFORMATIONAL PLEADING AND SUGGESTION

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and, for this *Informational Pleading and Suggestion*, respectfully states:

1. On September 28, 2011, the Commission entered its *Report and Order* in File No. HC-2010-0235 in which it ordered that:

KCP&L Greater Missouri Operations Company shall refund to its steam customers, through operation of the Quarterly Cost Adjustment, the net cost of operating its natural gas price hedging program for steam production in the amount of \$931,968 for 2006 and \$1,953,488 for 2007.

2. On October 17, 2011, KCP&L Greater Missouri Operations Company (GMO) filed its *Application for Rehearing* in File No. HC-2010-0235, in which it sought rehearing of *inter alia* (1) the Commission's finding of GMO's imprudence which was the basis for ordering any refunds; (2) the Commission's calculation of damages; and (3) the Commission's inclusion of all steam customers – as opposed to only the named complainant – in its decision.

3. In File No. HT-2011-0343, on October 14, 2011, GMO filed its tariff sheet to make a quarterly cost adjustment required by GMO's Quarterly Cost Adjustment Rider.¹ The Quarterly Cost Adjustment Rider requires quarterly rate adjustments.

4. Staff has performed a preliminary review of that tariff sheet and determined that the tariff sheet does not implement the refund ordered by the Commission in File No. HC-2010-0235.

¹ The Commission approved GMO's Quarterly Cost Adjustment Rider in Case No. HR-2005-0450, and modified it in Case Nos. HR-2009-0092 and HR-2010-0028.

5. In light of the pending *Application for Rehearing* in File No. HC-2010-0235, Staff is not inclined to recommend rejection of the tariff sheet GMO filed File No. HT-2011-0343, on October 14, 2011, on the basis that it does not incorporate the refund ordered in File No. HC-2010-0235.

6. In order to facilitate timely implementation of adjustments under GMO's Quarterly Cost Adjustment Rider, Staff respectfully suggests that the Commission timely enter an order informing the parties as to whether it intends this particular rate adjustment pursuant to GMO's Quarterly Cost Adjustment Rider to implement the refund as ordered in File No. HC-2010-0235. Such order would allow adequate time for (1) GMO – if GMO so chooses – to withdraw the tariff sheet it filed on October 14, 2011, and submit a new tariff sheet, and (2) for Staff review of any such new tariff sheet.

WHEREFORE, the Staff of the Missouri Public Service Commission respectfully submits this *Informational Pleading and Suggestion*.

Respectfully submitted,

/s/ Sarah Kliethermes

Sarah L. Kliethermes
Senior Counsel
Missouri Bar No. 60024

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-6726 (Telephone)
(573) 751-9285 (Fax)
sarah.kliethermes@psc.mo.gov

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 21st day of October, 2011.

/s/ Sarah Kliethermes