



Roger W. Steiner
Corporate Counsel
Telephone: 816-556-2314
Fax: 816-556-2787
roger.steiner@kcpl.com

June 17, 2019

Mr. Morris Woodruff
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65102

**Re: Tariff Schedule to Adjust Demand Side Investment Mechanism Rider Rate of
KCP&L Greater Missouri Operations Company**

Dear Mr. Woodruff:

Pursuant to 4 C.S.R. 240-20.093(4) of the regulations of the Missouri Public Service Commission (“Commission”), KCP&L Greater Missouri Operations Company (“GMO” or the “Company”) hereby submits a proposed rate schedule to adjust charges related to the Company’s approved Demand Side Investment Mechanism Rider (“DSIM rate”). The proposed rate schedule bears an issue date of June 17, 2019, and an effective date of August 1, 2019.

As the Commission is aware, the Company filed a Motion to Correct Tariff and Request for Expedited Treatment in Case No. EO-2019-0132; Tracking No. YE-2019-0215 on May 30, 2019 to restore Tariff Sheet 138.7 to the tariff that both the Company and the Commission intended to be in effect. Therefore, GMO requests the Commission grant a variance of the 60-day approval requirement found in 4 CSR 240-20.093(4) and approve this tariff by August 1, 2019 (less than 60 days after filing).

Please provide a copy of all correspondence, notices, orders, and other communications that relate to this filing to the following as well as undersigned counsel:

Lisa A. Starkebaum
Manager – Regulatory Affairs
Kansas City Power & Light Company
1200 Main Street – 19th Floor
Kansas City, Missouri 64105
Phone: (816) 556-2209

Fax: (816) 556-2110

Email: lisa.starkebaum@kcpl.com

The DSIM rate components consist of projected Program Costs and projected Throughput Disincentive (TD) associated with the Missouri Energy Efficiency Investments Act (“MEEIA”) Cycle 2 for May 2019 through December 2019 and the reconciliation of actual and expected Program Costs and actual and expected TD/TD-NSB for both Cycles 1 and 2 through April 2019. The performance incentive from Cycle 1 was included for recovery over a two-year period ending January 2019. So, the performance incentive is reflected in the DSIM rate in this filing only as it relates to certain under-recovered balances. These amounts are divided by the projected retail sales, excluding opt-out sales from customers, for August 2019 through January 2020 to develop a rate to be used in the DSIM rate.

At this time, based on actual performance experienced through April 2019 and forecasts through December 2019, the proposed residential DSIM rate will be higher than the current rate of \$0.00019 per kWh and will become \$0.00387 per kWh. For a residential customer using 1,000 kWh’s, this would mean an increase of \$3.68 per month. The proposed DSIM rate will also increase for the non-residential class from \$0.00258 per kWh to \$0.00451 per kWh. For a non-residential customer using 1,000 kWh’s, this would mean an increase of \$1.93. This increase is primarily the result of an increase in program costs due to the extension of MEEIA Cycle 2 programs previously scheduled to expire effective March 31, 2019.

As explained in the Direct Testimony and supporting schedules of Lisa A. Starkebaum, which are submitted concurrently herewith, the overall DSIM rate reflects progress towards achievement of energy and demand savings originally established in the MEEIA filing made in File No. EO-2012-0009 and updated in File No. EO-2015-0241. Also provided herewith are schedules containing the information required by 4 C.S.R. 240-20.093(4) including all work papers that support the proposed rate schedule.

Copies of the proposed DSIM rate schedule and all supporting materials described in this letter will be served electronically, this date, on the Commission’s General Counsel, Staff Counsel, the Office of Public Counsel, and each party to File No. EO-2012-0009 and EO-2015-0241.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner
Corporate Counsel for
Kansas City Power & Light Company

cc: Office of the General Counsel
Office of Staff Counsel
Office of the Public Counsel