

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

In the Matter of KCP&L Greater Missouri)	
Operations Company's Submission of Its 2017)	File No. EO-2018-0289
Renewable Energy Standard Compliance Report)	

In the Matter of KCP&L Greater Missouri)	
Operations Company's Submission of Its 2018)	File No. EO-2018-0291
Renewable Energy Standard Compliance Plan)	

**KCP&L GREATER MISSOURI OPERATIONS COMPANY'S RESPONSES TO
COMMENTS OF MISSOURI DIVISION OF ENERGY ON RENEWABLE ENERGY
STANDARDS COMPLIANCE FILINGS**

COME NOW KCP&L Greater Missouri Operations Company ("GMO" or the "Company") and, for its response to the Missouri Department of Economic Development – Division of Energy ("DE") comments on GMO's Renewable Energy Standards ("RES") compliance filings, states as follows:

I. BACKGROUND

1. On April 13, 2018, GMO filed its *2017 Renewable Energy Standard Compliance Report and Request for Waiver* ("GMO Report") with the Missouri Public Service Commission ("Commission") to open Docket No. EO-2018-0289 ("289 Docket"), as well as its *2018 Renewable Energy Standard Compliance Plan* ("GMO Plan") to open Docket No. EO-2018-0291 ("291 Docket").

2. On May 3, 2018, DE filed an *Application to Intervene* in both the 289 Docket and 291 Docket, both of which were granted by Commission Order issued on May 14, 2018.

3. On May 29, 2018, DE filed its *Comments Regarding Renewable Energy Standard Compliance Filings* ("Comments") in both the 289 Docket and 291 Docket. DE suggests that Senate Bill 564 (2018)("SB 564") may warrant changes in the Company's methods of compliance and revisions to its RES compliance plan.

II. RESPONSE TO DE COMMENTS

4. GMO is evaluating the impact of SB 564, which was signed into law on June 1, 2018 and becomes effective on August 28, 2018.

5. 4 CSR 240-20.100 (8)(B) requires the Company to provide a RES Compliance Plan. RES is defined within the rule as meaning sections 393.1025 and 393.1030 RSMo. The elements required under section (8)(B)(1) A-G do not need to be updated due to the passage of SB 564, as the requirements set forth in 393.1025 and 393.1030 RSMo are separate and apart from those set forth in SB 564.

6. As SB 564 was only recently signed and is not yet effective, the Company is currently evaluating the requirements as set forth in the Bill, and how best to meet them. Nevertheless, GMO will keep the Commission aware of its compliance with the requirements of SB 564 through various filings in the future.

WHEREFORE, KCP&L Greater Missouri Operations Company requests the Commission consider its response to DE's Comments.

Respectfully submitted,

/s/ Roger W. Steiner

Robert J. Hack, MBN 36496
Phone: (816) 556-2791
E-mail: rob.hack@kcpl.com
Roger W. Steiner, MBN 39586
Phone: (816) 556-2314
E-mail: roger.steiner@kcpl.com
Kansas City Power & Light Company
1200 Main – 16th Floor
Kansas City, Missouri 64105
Fax: (816) 556-2787

**Attorney for KCP&L Greater Missouri
Operations Company**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, this 8th day of June, 2018, to all parties of record.

/s/ Roger W. Steiner

Roger W. Steiner