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

In the Matter of the Application of KCP&L ) Greater Missouri Operations Company for ) Permission and Approval of a Certificate of ) Public Convenience and Necessity Authorizing ) It to Construct, Install, Own, Operate, Maintain ) and Otherwise Control and Manage Solar ) Generation Facilities in Western Missouri. )

Case No. EA-2015-0256

## KCP&L GREATER MISSOURI OPERATIONS COMPANY'S COMPLIANCE FILING

COMES NOW KCP&L Greater Missouri Operations Company ("GMO" or the "Company") and states as follows:

1. On March 2, 2016, the Commission issued its Report and Order in the above-

captioned proceedings, to be effective on March 12, 2016. Pursuant to ordered paragraphs 2(a)

through 2(f) of the Commission's March 2, 2016 Report and Order, GMO hereby submits the

following:

2(a) File with the Commission a list of all electric and telephone lines of regulated and nonregulated utilities, railroad tracks, or any underground facility the proposed construction will cross as required by 4 CSR 240-3.105(1)(B)1, or a statement that there are no electric and telephone lines, railroad tracks, or underground facilities on the project site.

**RESPONSE:** The site of the Greenwood solar facility has historically been farm land.

There are no electric and telephone lines, railroad tracks, or underground facilities on the project

site.

2(b) File the complete plans and specifications for construction of the proposed Greenwood Solar Facility with the Commission as required by 4 CSR 240-3.105(1)(B)2. **RESPONSE:** On December 15, 2015, the Company filed plans and specifications for construction in this docket, "KCP&L Greater Missouri Operations Company's Late-Filed Attachments to Its November 12, 2015 Application" (see Document No. 20).

Since that filing on December 15, 2015, the information in the files named "13-16101-00\_KCPL Solar Array Progress\_151120-Part 1\_HIGHLY CONFIDENTIAL" and "13-16101-00\_KCPL Solar Array Progress\_151120-Part 2\_HIGHLY CONFIDENTIAL" has been updated. The updated information issued for construction is attached here as files "Appendix A KCPL Solar IFC\_DWGs HC\_Part1" and "Appendix A KCPL Solar IFC\_DWGs HC\_Part2".

The Company's response to MPSC data request 0028S, contained additional information regarding the plans and specifications. That response is attached here in Appendix B.

At the time the Company responded to MPSC 0028S the Company had not chosen the brand and location of the Meteorological Station stating, "5.3.20 - Meteorological Stations – Discussion on brand and location still ongoing." The Company has since chosen a Lufft WS-500-UMB weather station, located at the Greenwood Solar Site.

Also, at the time the Company responded to MPSC 0028S, the Company had not completed an ArcFlash Study and Labels, stating, "5.3.24 – Arc Flash Study and Labels - Study is contingent upon equipment & relay protection settings. Items to be coordinated with electrical contractor & KCPL. Study will be produced following that coordination process." That Highly Confidential study is now completed and is attached as file "Appendix B 5 KCPL Greenwood Solar\_Arc Flash Study\_160422 HC" in Appendix B.

2(c) File with the Commission all required approvals as required by 4 CSR 240-3.105(1)(D), or seek an appropriate waiver, as provided by 4 CSR 240-3.105(2).

**RESPONSE:** See Exhibit No. 23, which was offered and admitted into evidence at the evidentiary hearing in this case on February 11, 2016, and originally filed in this docket on

February 16, 2016 (see Document No. 77). This is the Company's responses to MPSC Data Request 0012 in this docket. It consists of the Jackson County letter stating no zoning changes are necessary, and the Highly Confidential Missouri State Operating Permit which authorizes land disturbance issued by the Missouri Department of Natural Resources.

Also see Appendix C, the Company's response to MPSC data request 0025. It is the Erosion and Sediment Control Permit issued by Jackson County, MO.

2(d) Perform and file with the Commission an Interconnection Study demonstrating the project will not cause an adverse impact to the company's distribution system before commencing construction. The major components of this study should include: an executive summary, description of the Solar PV equipment and point of interconnection, the projected distribution system conditions, load flow analysis, and fault analysis.

**RESPONSE:** See Highly Confidential Attachment A in the Company's compliance

filing made in this docket on March 3, 2016 (see Document No. 87).

2(e) Develop and file with the Commission a plan outlining its learning objectives for the Greenwood Solar Facility and a description of how the company will evaluate those objectives before commencing construction.

**RESPONSE:** See Attachment B in the Company's compliance filing made in this

docket on March 3, 2016 (see Document No. 87).

2(f) File with the Commission an evaluation of the Plan required by e) after the Greenwood Solar Facility has operated for a period of five years before the company's application for a certificate of convenience and necessity for its next utility-scale solar facility.

**RESPONSE:** No response necessary at this time.

Respectfully submitted,

## [s] Roger W. Steiner

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## **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  $6^{th}$  day of May, 2016, to all counsel of record.

[s] Roger W. Steiner

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