

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

In the Matter of the 2017 Integrated Resource Plan)	
Annual Update for Kansas City Power & Light)	File No. EO-2017-0229
Company)	

In the Matter of the 2017 Integrated Resource Plan)	
Annual Update for KCP&L Greater Missouri)	File No. EO-2017-0230
Operations Company)	

**NOTIFICATION OF CHANGE IN
PREFERRED RESOURCE PLAN AND REQUESTS FOR VARIANCE**

NOW COMES Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”)(collectively the “Company”), by and through its counsel, and for its *Notification of Change in Preferred Resource Plan and Request for Variance* (“Notice”) to the Missouri Public Service Commission (“Commission”), states as follows:

1. Pursuant to 4 CSR 240-22.080(12), the Company is hereby providing notification of events that will produce a change in the preferred resource plans submitted in the annual update above-referenced dockets.

2. Specifically, the Company has recently executed power purchase agreements for 100% of the output from two new wind facilities totaling 444 MW of nameplate capacity. The projects are:

- a. Pratt Wind, owned by NextEra Resources, 244 MW located in Pratt County, KS, with an expected online date by December 31, 2018. This agreement was signed October 12, 2017.
- b. Prairie Queen, owned by EDP Renewables, 200 MW in Allen County, KS, with an expected online date by June 1, 2019. This agreement was signed November 17, 2017.

3. The Company is requesting a variance from that portion of 4 CSR 240-22.080(12) that requires, in part that the Company provide written notice to the commission within sixty days of the determination that the preferred resource plan or acquisition strategy is no longer

appropriate, should the Commission believe such a variance is necessary. Good cause exists for this request in that the possibility of significant changes to the federal Production Tax Credit (“PTC”) made the execution of the above referenced agreements uncertain. Should the PTC have been significantly changed, it was the Company’s belief that these wind projects may not have been built or would require a significant unacceptable change in contract pricing terms. The federal tax law that preserved the PTC became effective on December 22, 2017. It was at that time that the Company considered these wind projects viable, resulting in a determination by the Company that the preferred resource plans were no longer appropriate. Based on the December 22nd tax law effective date, this notification falls within the 60-day requirement of 4 CSR 240-22.080(12). To the extent the Commission believes a variance is required based on the wind facilities contract dates, the Company requests a variance from the 60-day notification requirement in 4 CSR 240-22.080(12) given the good cause stated.

4. The Company is also requesting a variance from that portion of 4 CSR 240-22.080(12) that requires, in part, an analysis of the impact of each change on the net present value of revenue requirements and other performance measures specified in the last filing. Instead, the impact of the two new wind facilities will be addressed in the 2018 Triennial compliance filing due on or before April 2, 2018. The Triennial filing will include an analysis that provides the impact of the change on the present value of revenue requirement and all other performance measures. The Company will also specify the ranges or combinations of outcomes for the critical uncertain factors that define the limits within which the new alternative resource plan remains appropriate. Because the Company will provide this information on or before April 2, 2018, good cause exists for a variance from 4 CSR 240-22.080(12).

WHEREFORE, the Company requests that the Commission consider this Notice and Requests for Variance.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MBN 39586

Corporate Counsel

Kansas City Power & Light Company

1200 Main Street, 19th Floor

Kansas City, MO 64105

Telephone: (816) 556-2314

Facsimile: (816) 556-2110

E-mail: roger.steiner@kcpl.com

**Attorney for Kansas City Power & Light
Company and KCP&L Greater Missouri
Operations Company**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document have been hand-delivered, emailed or mailed, postage prepaid, this 2nd day February, 2018 to all counsel of record in these dockets.

/s/ Roger W. Steiner

Roger W. Steiner