

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

In the Matter of an Investigation of Missouri)	
Jurisdictional Generator Self-Commitments into)	File No. EW-2019-0370
SPP and MISO Day-Ahead Energy Markets)	

**KANSAS CITY POWER & LIGHT COMPANY AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY’S RESPONSE
TO SIERRA CLUB’S COMMENTS ON STAFF REPORT**

COME NOW Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively “KCP&L/GMO”) and, for their *Response to Sierra Club’s Comments on Staff Report* filed with the Missouri Public Service Commission (“Commission”) on September 6, 2019 in this docket, state as follows:

1. KCP&L/GMO disagree with *Sierra Club’s Comments* because they rely on an overly simplistic view of an inherently complex function and recommend the imposition of substantial additional reporting burdens on utilities without identifying resulting benefits that would justify such additional reporting and cost.

2. Staff appropriately recognized this complexity by announcing its intent to monitor the utilities’ self-commitment practices during fuel adjustment clause (“FAC”) prudence reviews. This forum provides ample time for review of data on self-commitment practices provided by each individual utility for a specific time period so that Staff and intervenors can assess the conduct of that utility and its impact on that utility’s customers. Sierra Club’s suggestion that “intervenors have only 10 days to supplement or respond to Staff’s assessment [made as a result of its prudence review]”¹ merits little credence given current practice where a brief response to Staff’s prudence review accompanied by a request for hearing routinely results in the establishment of an extended

¹ *Sierra Club’s Comments on Staff Report*, p. 14.

procedural schedule for the adjudication of allegations of imprudence on the part of the subject utility.

3. Even more unreasonable is Sierra Club's suggestion that utility self-commitment practices should be reviewed in the context of filings to adjust fuel adjustment rates ("FARs").² The review process and scope for these filings is intentionally abbreviated in recognition of the potential volatility and magnitude of changes in FAC-related costs and revenues as well as the fact that a comprehensive prudence review and true-up audit will be undertaken after the fact. Consequently, Sierra Club's suggestion that utility self-commitment practices should be reviewed in the context of fuel adjustment rate filings should be rejected as inconsistent with the purpose and function of the FAC.

WHEREFORE, KCP&L and GMO request that the Commission take notice of this *Response to Sierra Club's Comments on Staff Report*.

Respectfully submitted,

/s/Robert J. Hack

Robert J. Hack, MBN 36496
Roger W. Steiner, MBN 39586
Kansas City Power & Light Company
1200 Main Street, 16th Floor
Kansas City, MO 64105
(816) 556-2785 (Phone)
(816) 556-2787 (Fax)
rob.hack@kcpl.com
roger.steiner@kcpl.com

**ATTORNEYS FOR KANSAS CITY POWER &
LIGHT COMPANY AND KCP&L GREATER
MISSOURI OPERATIONS COMPANY**

² *Sierra Club's Comments on Staff Report*, p. 14.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed or mailed, postage prepaid, this 16th day of September 2019, to all counsel of record.

/s/ Robert J. Hack

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