

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

In the Matter of a Working Case to Explore)
Emerging Issues in Utility Regulation) Case No. EW-2017-0245

**KANSAS CITY POWER & LIGHT COMPANY’S AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY’S
RESPONSE TO STAFF REPORT ON DISTRIBUTED ENERGY RESOURCES**

Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, “KCP&L” or “the Company”) hereby submits its response to Staff (“Staff”) of the Missouri Public Service Commission (“Commission”) *Report on Distributed Energy Resources* (“Staff Report”), filed in this docket on April 5, 2018. For its response, the Company states as follows:

1. The Company is still reviewing Staff’s Report. While it understands that it will be afforded the opportunity to provide comments in later rulemakings and Commission ordered filings, there were several sections of the report which the Company did not fully understand or that requested information that the Company believes it will be unable to provide. The Company raises the following clarification points that it discovered in its initial review.

A. Staff recommends on p. 10 of the Staff Report that the electric utilities be directed to maintain the following information:

- Aggregate information characterizing the distribution circuits where retail-scale DER are connected
- Aggregate capacity of retail-scale DER for each feeder or load
- Relevant interconnection standard requirements that specify DER performance of legacy and modern DER (such as the vintage of IEEE 1547).

Read plainly these recommendations do not create concern, but when considered with the accepted definition of DER, concerns arise. The definition of DER cited on page 4 of the Staff report includes electric vehicles and energy efficiency. The Company questions whether Staff intended that energy efficiency data be collected at the circuit level. Due to the many forms energy efficiency may take, the utility's ability to track this information at the circuit level is doubtful. NARUC, in its discussion of the definition, notes that energy efficiency was included but only with respect to dispatchable forms of energy efficiency. The Company seeks clarification of the intent of the expectation for energy efficiency.

Concerning electric vehicles ("EV") the Company has similar concerns. There are no requirements that the customer shall notify the Company when an EV is purchased. Further, since EVs by their nature are mobile and charging can occur at numerous locations on the grid, the intent of tracking these items is unclear. However, some EV charging stations are networked and have the ability to be dispatchable demand response resources. For the purpose of planning and the details of this section, the Company does not believe that EVs themselves are DER resources, but an EV charging station participating in a DER program would be a DER resource.

B. Staff recommends on p. 22 of the Report that the Commission direct KCP&L and GMO to submit supplemental direct testimony in their pending rate cases that includes tariffs similar to the Indiana model and encourage Ameren to submit model tariffs similar to the Indiana model in its MEEIA Cycle III filing. The Company believes that the Indiana model of third party aggregation has the potential to work in Missouri after the model is reconciled with SPP tariffs. The Company understands that provisions to support aggregation are part of the SPP tariff, but that there are currently no companies that utilize these provisions. The Company will work with SPP to work through how the provisions in the SPP tariff might be implemented in conjunction with a new Company tariff filing. The Company also believes that the third party aggregation

programs are MEEIA programs and asks that it, like Ameren, be allowed to introduce its tariffs in its MEEIA Cycle 3 filing, expected later this year.

C. The Company agrees with Staff's statement on p. 17 of the Report that there are several policy and practical issues to consider before implementing distributed generation and storage measures as part of a demand response or interruptible service program. The Company believes that future rulemakings and workshops are the appropriate forums to address these issues and looks forward to presenting its positions to the Commission.

The Company appreciates the work of Staff in developing recommendations for next steps on these important issues and the opportunity to actively participate in this docket as well as any potential future rulemaking proceedings or other proceedings to address any of the recommendations.

WHEREFORE, the Company request the Commission accept its initial response to Staff's Report.

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 16th day of April 2018, to all counsel of record.

/s/ Roger W. Steiner

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