

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

In the Matter of Staff’s Review of Commission)
Rules 4 CSR 240-20.060 (Cogeneration),)
4 CSR 240-3.155 (Filing Requirements for Electric) File No. EW-2018-0078
Utility Cogeneration Tariff Filing), and)
4 CSR 240-20.065 (Net Metering))

**RESPONSE OF KANSAS CITY POWER & LIGHT COMPANY AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY
TO COMMISSION ORDER**

Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) hereby submit comments in response to the Missouri Public Service Commission’s (“Commission”) *Order Inviting Responses to Draft Rules* issued in this docket on May 22, 2018, and state as follows:

4 CSR 240-20.060 – Cogeneration

1. General. It appears that some of the internal references in the draft rule have not been updated. For example, (3)(B) Obligation to Sell to Qualifying Facilities references section (5) of the draft rule. However, the section referred to in the current rule, Rates for Sales has become section (6) in the draft rule. The draft rule also contains two sections labeled (5)(E). All references should be reviewed and updated, as necessary, prior to the commencement of a formal rulemaking.

2. 4 CSR 240-20.060(1) (C). KCP&L and GMO suggest that the word “capital” be removed from the definition of capacity costs as purchased power agreements do not have capital costs and can be used to provide capacity.

3. 4 CSR 240-20.060(2)(C) 4. The draft rule removes the following sentence: “The customer shall notify the utility prior to the initial testing of the customer’s generating system and the utility shall have the right to have a representative present during the testing.” This sentence is not covered by any other rules and KCP&L and GMO believe that this protection needs to be

retained in the rule in order to properly identify and accommodate testing activity within our operations and ensure the customer generating systems are prepared to become part of the utility systems.

4. 4 CSR 240-20.060(4)(c)1. KCP&L and GMO believe it is unnecessary to include a reference to the net metering standard contract in this regulation, particularly since the rule revisions suggest a separate process for the creation and approval of both net metering and cogeneration standard contracts.

5. 4 CSR 240-20.060(6)(B)1. KCP&L and GMO suggest that the words, “or as required by the utility” be added after the phrase “Upon request of a qualifying facility” that begins this rule sentence. In this way, the utility has a way to apply its stand-by rate should a customer not request a stand-by rate even though the customer is taking stand-by services from the utility.

6. 4 CSR 240-20.060(7)(A). The draft rule properly addresses the customer's obligation to reimburse the utility for interconnection costs. KCP&L and GMO believe that additional language should be added that indicates that the customer may be responsible for regional transmission organization costs as well if the customer is connecting to, or impacting, transmission facilities.

4 CSR 240-20.065 – Net Metering

7. 4 CSR 240-20.065(5)(A). The draft rule provides that customer-generators can waive the liability insurance minimum policy requirements "for good cause shown." KCP&L and GMO are unclear how this provision would be implemented and believe that there could be differing interpretations of what constitutes good cause which could lead to Commission complaints. For this reason, KCP&L and GMO request that the “good cause” language be removed.

8. 4 CSR 240-20.065(6). KCP&L and GMO believe that a new section (C) needs to be added to give the utility the ability to require certain equipment be included in the customer-generator's system to allow better coordination and operation within the Company's distribution system. This equipment can be used to help synchronize the operation of the net metered systems to better support the distribution system and reduce any negative impacts. The following language is proposed.

- (C) The electric utility may require that a customer-generator's system contain additional equipment, as needed by the electric utility, to monitor, integrate, and influence the operation of the net metered system, improving the function within the electric utility's distribution system.

WHEREFORE, KCP&L and GMO submit their comments for consideration by the Commission and appreciate the opportunity to participate in this Working Case.

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 15th day of June 2018, to all counsel of record.

/s/ Roger W. Steiner

Roger W. Steiner

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