

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

In The Matter of a Determination of Special)	
Contemporary Resource Planning Issues to be)	
Addressed by Kansas City Power & Light)	File No. EO-2019-0063
Company in its Next Triennial Compliance)	
Filing or Next Annual Update Report)	

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**KANSAS CITY POWER & LIGHT COMPANY’S
AND KCP&L GREATER MISSOURI OPERATIONS COMPANY’S
RESPONSE TO SUGGESTED SPECIAL CONTEMPORARY ISSUES**

Pursuant to Missouri Public Service Commission (“Commission”) Rule 4 CSR 240-22.080(4)(B), Kansas City Power & Light Company (“KCP&L” or “Company”) and KCP&L Greater Missouri Operations Company (“GMO” or “Company” hereby respectfully submits its Response to the lists of special contemporary issues suggested by Missouri Public Service Commission Staff (“Staff”), Office of Public Counsel (“OPC”), Natural Resources Defense Council (“NRDC”), Missouri Department of Economic Development - Division of Energy (“Division of Energy”) and the Sierra Club. The suggestions by the parties for special contemporary issues are identical for both KCP&L and GMO, except where noted in one instance by the Sierra Club; therefore, the Company hereby submits one response for both special contemporary issue dockets.

I. Introduction

In Rule 4 CSR 240-22.080(4)(A) parties to the Integrated Resource Plan (“IRP”) process may file a list of suggested Special Contemporary Issues.

The definition of “Special Contemporary Issue” is found at 4 CSR 240-22.020(55):

(55) Special contemporary issues means a written list of issues contained in a commission order with input from staff, public counsel, and intervenors that are evolving new issues, which may not otherwise have been addressed by the utility or are continuations of unresolved issues from the preceding triennial compliance filing or annual update filing. Each utility shall evaluate and incorporate special contemporary issues in its next triennial compliance filing or annual update filing.

4 CSR 240-22.080(4) characterizes special contemporary issues generally as, “evolving regulatory, economic, financial, environmental, energy, technical, or customer issues,” that utilities must adequately address in their resource planning. The Commission has provided additional guidance on the assessment of proposed special contemporary issues in its order in File No. EO-2012-0039.

The Company has an opportunity to respond to the lists provided in accordance with Rule 4 CSR 240-22.080(4)(A) by October 1, according to Rule 4 CSR 240-22.080(4)(B).

II. Staff List of Contemporary Issues

On September 14, 2018, Staff filed four suggestions for special contemporary issues.

A. When complying with 4 CSR 240-22.060(5)(M), include the following as uncertain factors that may be critical to the performance of alternative resource plans:

(i) Foreseeable demand response technologies, including, but not limited to, integrated energy management control systems, linking smart thermostats, lighting controls, and other load-control technologies with smart end-use devices;

(ii) Foreseeable energy storage technologies; and

(iii) Foreseeable distributed energy resources, including, but not limited to distributed solar generation, distributed wind generation, combined heat and power (CHP), and microgrid formation. Develop and provide a database of information on distributed

generation (both utility owned and customer owned) and distributed energy storage (both utility owned and customer owned) for purposes of evaluating current penetration and planning for future increases in the levels of distributed generation and energy storage.

RESPONSE: The Company is unable to comply with this suggestion as it does not meet the definition of “special contemporary issue.” Item (i) is not an evolving new issue, which may not otherwise have been addressed by the Company, but rather an item that would be addressed in demand-side management (DSM) potential studies and/or MEEIA filings. Item (ii) and (iii) are overly broad and speculative. For example, many different technologies can be used for storage. With respect to item (iii), the Company already has a database on known distributed energy resources (DER). However, it would be a large undertaking to incorporate this high-level database into a database that could be utilized for planning purposes. Additionally, penetration is only known to a degree as the Company cannot account for systems that it isn’t aware of. The Company would be unable to complete this in a few months. Additionally, Staff proposed resource planning rules for DER in File No. EW-2017-0245 and it is premature to include such an analysis in an IRP annual update. It is not appropriate to include this suggestion as a special contemporary issue and the Commission should exclude this proposed issue from the final list of such issues.

B. When complying with 4 CSR 240-22.060(5)(A), analyze and document the impact of electric vehicle usage for the 20-year planning period upon the low-case, base-case and high-case load forecasts.

RESPONSE: The Company can comply with this suggestion.

C. Analyze and document the cost of any transmission grid upgrades or additions needed to address transmission grid reliability, stability, or voltage support impacts that could result from the retirement of any existing coal-fired generating unit in the time period established in the IRP process.

RESPONSE: Retirement of any of the larger KCP&L coal fired generators would necessitate the replacement of that supply with some other resource. It is not possible to identify all the necessary transmission upgrades that might be associated with retirement of a specific generating unit without knowing the specific location of the replacement generation. From the transmission perspective, the most advantageous location for replacement generation is the site of the retired generation where the transmission capacity utilized by the retired generation would be available for new resources. It is not appropriate to include this suggestion as a special contemporary issue and the Commission should exclude this proposed issue from the final list of such issues.

D. Provide the most recent analysis of the costs and benefits of KCP&L's system-wide implementation of AMI meters. Provide projected implementation dates and annual budget for AMI implementation and – if KCP&L is performing integrated resource analysis - include the capital and operating cost impacts in the integrated resource analysis. If an analysis of AMI costs and benefits does not exist, please provide a detailed explanation of why it does not exist.

RESPONSE: The Company can comply with this suggestion.

III. OPC List of Contemporary Issues

On September 14, 2018, OPC filed three suggestions for special contemporary issues. OPC requests the Company address the following topics: (1) Additive Manufacturing (“AM” or “3D Printing”), (2) Stacking Concrete Blocks with Cranes; and, (3) Crossroads.

(A) OPC requests the following regarding Additive Manufacturing (“AM” or “3D Printing”):

1.) Analyze and document the feasibility and cost saving implications (if any) in adopting AM technology to maintain present-day and future supply-side investments.

2.) Analyze and document the feasibility and cost saving implications (if any) in adopting AM technology to maintain present-day and future transmission system investments.

3.) Analyze and document the feasibility and cost saving implications (if any) in adopting AM technology to maintain present-day and future distribution system investments.

OPC does not presently recommend modeling a high-AM adoption scenario in the IOU’s load forecasts but would not be opposed to such modeling considerations either.

RESPONSE: The Company does not believe at this point that 3D printing would have a significant impact on resource planning in the near future; however, if the Commission thinks this should be considered a special contemporary issue, the Company can comply with this suggestion.

(B) OPC requests the following regarding Stacking Concrete Blocks with Cranes:

1.) Analyze and document the feasibility and cost saving implications (if any) in utilizing concrete blocks and cranes as a battery storage option for resource needs.

a. Given the specific nature of this topic, OPC would not be opposed to a singular response/investigation on this topic from all of the IOUs as opposed to four separate responses.

RESPONSE: The Company does not believe at this point that stacking concrete blocks with cranes as a battery storage option would have a significant impact on resource planning in the near future; however, if the Commission thinks this should be considered a special contemporary issue, the Company can comply with this suggestion.

(C) OPC requests the following regarding Crossroads:

1.) Model a scenario that does not include Crossroads ownership in 2029.

RESPONSE: The Company can comply with this suggestion.

IV. NRDC List of Contemporary Issues

On September 14, 2018 NRDC filed three suggestions for special contemporary issues.

1. In addition to the exercise prescribed in 4 CSR 240-22.045, KCP&L should analyze integrated distribution planning as a way to manage the distribution grid in a manner that reduces peaks and fills valleys in load profiles and lowers overall system costs with a combination of energy efficiency, demand response, electric vehicles, distributed generation, storage, advanced metering, and pricing strategies such as time-of-use rates (TOU) and inclining block rates (IBR).

RESPONSE: A comprehensive integrated distribution planning as described is not feasible for the next annual update, which is due on March 2019. There is a current workshop docket (File No. EW-2017-0245), which proposes rules that would move utilities in this direction

and help look for opportunities to address distribution system needs in non-traditional ways. This is a developing area and it is premature and unreasonable to expect meaningful results in such a short time from an attempted analysis; therefore, this should not be considered a special contemporary issue.

2. Analyze and assess the use of mechanisms such as green tariffs and community solar to increase the availability of distributed generation for large and small customers.

RESPONSE: The Company can comply with this suggestion.

3. Analyze and document the prospects for using securitization to advance the retirement of coal generation assets and channel the savings into more economical investments such as demand-side management, building wind and solar generation, and satisfying corporate renewable energy goals to attract new business to the service territory. Securitization is essentially a lower cost, long-term loan that ratepayers take out and pledge to repay using a portion of their future electricity bills using a long-term, lower-cost bond that will save customers money, some of which can be used as new capital.

RESPONSE: The Company will respond to this issue in the 2019 Annual updates.

V. Division of Energy List of Contemporary Issues

On September 14, 2018 the Division of Energy filed eighteen suggestions for special contemporary issues.

1. Evaluate the need to upgrade and enhance the utility's delivery infrastructure in order to ensure and advance system resiliency, reliability, and sustainability. In this evaluation, describe and document the potential job growth that utility investments in delivery infrastructure could create.

RESPONSE: This has been included in the 2018 triennial IRP filing and is very unlikely to have near-term implications for resource planning. Moreover, passage of SB 564 addresses the need for such investments in delivery infrastructure; therefore, this should not be considered a special contemporary issue.

2. Describe and document how the utility investments in grid modernization, DSM, and distributed energy resources can improve customer energy service options and substitute for supply-side investments under the utility's contingency plan.

RESPONSE: Grid modernization, DSM and distributed energy resources have all been discussed in the triennial IRP filing. There is nothing that indicates conditions changed so much since the last IRP that would change the results. Therefore, this should not be considered a special contemporary issue.

3. Describe and document how the utility's standby service rates, cogeneration tariffs, and interconnection standards facilitate or impede the development of customer-owned distributed generation resources and microgrids. If the utility's standby service rates impede the development of customer-owned generation and microgrids, address plans the utility has for the review of standby service rates and their revision. Document customer and potential customer inquiries and complaints received by the Company through all forms of customer communication, including but not limited to, call center communications, e-mail, social media and others.

RESPONSE: The Company can comply with this suggestion but suggests that any documentation of customer and potential customer inquiries not begin until the outcome of the Company's current rate proceedings.

4. Describe and document how the utility's investments in grid modernization, DSM, and renewable energy will ensure that the public interest is adequately served and that other policy objectives of the state are met (see 4 CSR 240-22.010). For example, please describe and document the potential for job creation and economic development.

RESPONSE: As evidenced by the Division of Energy's citation of the IRP rules, utilities are already required as a basic element of IRP analysis to conduct resource planning that ensures the public interest is met, including the consideration of state policy objectives. Lastly, SB 564 has specific provisions related to grid modernization. As a result, the Company does not believe this should be considered a special contemporary issue.

5. Describe and document the benefits and detriments for integrated resource planning to requiring achievement of targets under MEEIA, either based on those targets found in the MEEIA rules or other targets determined feasible by the utility. If the utility chooses to use targets other than those found in the MEEIA rule, state why the utility chose such targets and why those found in the rule are infeasible.

RESPONSE: This suggestion does not meet the definition of “special contemporary issue.” It is not an evolving new issue, which may not otherwise have been addressed by the Company. The Company is already required by 4 CSR 240-20.094(3)(A)2. to conduct a market potential study no less than every three years. As required by the IRP rules, the market potential study identifies levels of energy efficiency potential that are realistic and what the maximum level of energy efficiency potential is possible (4 CSR 240-22.020(49) and 4 CSR 240-22.020(40)). The goals under MEEIA are unrealistic and arbitrary and not specific to either the KCP&L or GMO jurisdictions and would not support the “goal of achieving all cost-effective demand-side savings” (4 CSR 240-20.094(4)(E)). As noted in the Company’s response to this same Special Contemporary Issue in the 2018 Triennial IRP filing, when viewed through the lens of a rigorous market potential study, the goals under MEEIA are found to be not just unrealistic, but technically impossible. To further analyze additional scenarios already identified by the potential study to be unrealistic and impossible would add additional and costly analysis to the potential study and would serve no purpose.

Division of Energy has not provided any evidence or explanation as to a need to evaluate arbitrary and unrealistic targets. Therefore, it is not appropriate to include this suggestion as a special contemporary issue and the Commission should exclude this proposed issue from the final list of such issues.

6. Identify and evaluate the quantifiable non-energy benefits (“NEBs”) which could be included in the utility’s demand-side management (“DSM”) portfolio planning process. This should be done for the purposes of IRP planning under the Commission’s recently revised Missouri Energy Efficiency Investment Act (“MEEIA”) rules and with reference to either primary or secondary research conducted by the utility. Additionally, evaluate the impact of a NEBs percentage “add” on the utility’s DSM portfolio planning process for the purposes of IRP planning. Discuss the utility’s preference for either a study to determine NEBs or the use of a NEBs percentage adder.

RESPONSE: This suggestion does not meet the definition of “special contemporary issue.” It is not an evolving new issue, which may not otherwise have been addressed by the Company. The IRP rules already clearly define the TRC test and NEBs, and how they are to be quantified, calculated, and used. No additional NEB percentage adder is permitted under the rules.

4 CSR 240-22.050(5)(B) stipulates that “The total resource cost test shall be used to evaluate cost effectiveness...” where the total resource cost test is defined by 4 CSR 240-22.020(60) and the benefits of the TRC are defined as the “sum of avoided utility costs plus avoided probable environmental costs.” Thus, the IRP rules clearly specify that the TRC test is the test that is to be used to determine cost effectiveness. Further, in 4 CSR 240-20.092(1)(II)4. the MEEIA rules, stipulate that “Non-Energy Benefits may be included in the total resource cost test (TRC) only if they result in avoided utility costs that may be calculated with a reasonable degree of confidence.” Therefore, additional analysis of NEBs would not contribute to the “goal of achieving all cost-effective demand-side savings” (4 CSR 240-20.094(4)(E)).

Division of Energy has not provided any evidence or explanation as to a need to go beyond what is already required and analyzed in compliance with the current IRP rules. Therefore, it is

not appropriate to include this suggestion as a special contemporary issue and the Commission should exclude this proposed issue from the final list of such issues.

7. Describe and document the roles that energy storage, conservation voltage reduction, and customer generation could play in the utility's system planning, particularly with regards to extreme weather situations, DSM, and distributed energy resources.

RESPONSE: The Company can comply with this suggestion.

8. Describe, document, and evaluate potential DSM programs which could address the needs of customers that have or might otherwise "opt out" of participation in MEEIA. In this evaluation, describe and document potential participation and savings (both energy and demand), as well as program costs and cost-effectiveness. Additionally, please describe and document the impacts of additional customer "opt-outs" on the MEEIA charges to customer classes and the ability to achieve estimated savings targets.

RESPONSE: The Company can comply with this suggestion.

9. Evaluate, describe, and document the feasibility, cost-reduction potential, and potential benefits of joint DSM programs, marketing, and outreach with water utilities.

RESPONSE: This suggestion does not meet the definition of "special contemporary issue." It is not an evolving new issue, which may not otherwise have been addressed by the Company. 4 CSR 240-22.020(13) defines a demand-side resource as "a demand side program or a demand-side rate conducted by the utility **to modify the net consumption of electricity** on the retail customer's side of the meter." [Emphasis added.] It is not appropriate to include this suggestion as a special contemporary issue and the Commission should exclude this proposed issue from the final list of such issues.

10. Evaluate the potential demand and energy load associated with electric vehicles within the utility's service territory, discuss how the preferred plan addresses the additional demand and energy load requirements, and evaluate potential means for shifting the additional demand and energy load to off-peak periods. Describe all current and planned electric vehicle initiatives undertaken by the utility, including how such initiatives have been affected by the Western District Court of Appeals' ruling in WD80911.

RESPONSE: The Company can comply with this suggestion.

11. Describe and document the utility's current distribution system planning process. Additionally, evaluate the benefits of requiring distribution system planning that facilitates customer usage of distributed energy resources.

RESPONSE: The Company has included its current distribution planning process in its 2018 triennial IRP filing. There is also a working docket (File No. EW-2017-0245) to look into distributed energy resources and how it can impact distribution planning. Since there are ongoing efforts around this issue already, this should not be considered a special contemporary issue.

12. Describe and document the utility's coordination with the State Emergency Management Agency to ensure readiness for physical and cyber security threats.

RESPONSE: The Company has previously participated in workshops and filed comments with the Commission related to physical and cybersecurity (File No. AW-2015-0206). The Company does not believe an IRP filing is the right forum for this discussion; therefore, this should not be considered a special contemporary issue.

13. Describe and document the extent to which federal investment, production, and other tax credits reduce the costs for utility plant.

RESPONSE: The Company can comply with this suggestion.

14. Describe and document the extent to which each of the utility's generating assets is or is not competitive within the utility's applicable Regional Transmission Organization or Independent System Operator.

RESPONSE: The Company can comply with this suggestion.

15. Describe and document the utility's plans regarding the authorities and requirements contained in Senate Bill 564 (2018), including, but not limited to, the following sections of the legislation:

a. Section 386.266, RSMo. (Rate Adjustments Outside of General Rate Proceedings, Surveillance Monitoring Report);

b. Section 393.170, RSMo. (Certificate of Convenience and Necessity);

c. Sections 393.1400 and 393.1655, RSMo. (Plant-in-Service Accounting, Capital Investment Plan, Rate Base Increase Regulatory Liability and Limitations);

d. Section 393.1610, RSMo. (Investments in Small Scale and Pilot Projects);

e. Section 393.1640, RSMo. (Discounted Electric Rates); and,

f. Section 393.1665, RSMo. (Utility-Owned Solar Facilities).

RESPONSE: All items except (d) and (f) are ratemaking items and should not be addressed in special contemporary issues as they are not resource planning issues.

16. Describe and document the utility's efforts to address the corporate social responsibility and/or renewable energy purchasing goals of commercial, industrial, institutional, and public sector customers for increased access to renewable energy and distributed generation resources.

RESPONSE: The Company can comply with this suggestion.

17. Describe and document the potential impacts of the U.S. District Court of Appeals for the District of Columbia Circuit’s decision in Utility Solid Waste Activities Group, et al., v. Environmental Protection Agency (“EPA”) regarding rules pertaining to coal combustion residuals. Additionally, include the utility’s assessment of the potential impacts of this ruling when considered in conjunction with the federal Water Infrastructure Improvements for the Nation Act and state Senate Bill 659 (2018). In so doing, identify all landfills and ponds currently or previously used by the utility or its predecessors for the disposal of coal combustion residuals and include information such as, but not limited to, disposal site age, usage status, liner type, hazard assessments, and ground and surface water monitoring results.

RESPONSE: As part of its ongoing resource planning process, the Company assesses the need for mitigation for environmental regulation compliance and includes its assessment and any updates to costs of mitigation in the triennial and annual IRP filings. It should also be noted that the CCR rules requires the Company to post compliance information on a publicly available website and all of the required information is posted to the website in compliance with the regulation. This issue does not warrant any special treatment; therefore, it should not be considered a special contemporary issue.

18. Describe and document the potential impacts on the utility of the EPA's proposed federal Affordable Clean Energy rule, including, but not limited to, the following aspects of the rule:

a. The use of on-site efficiency upgrades as the best system of emission reduction for reducing carbon dioxide emissions;

b. Changes to the New Source Review permitting program; and,

c. Changes to the implementation of Section 111(d) of the Clean Air Act regarding EPA's emission guideline issuance and state plan development and submission.

RESPONSE: The Company can comply with this suggestion.

VI. Sierra Club List of Contemporary Issues

On September 14, 2018, Sierra Club filed nine suggestions for KCP&L and eight suggestions for GMO for special contemporary issues.

1. Analyze and screen electric vehicle charging infrastructure as a candidate resource option in light of the Court of Appeals Western District's decision in KCP&L v. PSC, No. WD80911 (Aug. 7, 2018), that such an investment may be recoverable in rate base.

RESPONSE: The Company can comply with this suggestion.

2. Analyze, document and screen renewable energy + battery storage as an alternative to existing coal-fired generation, comparable to Xcel Energy's proposed Colorado Clean Energy Plan in Colorado PUC docket No. 16A-0396E.

RESPONSE: The Company can comply with this suggestion.

3. Analyze and develop as candidate resource options the satisfaction of municipal and corporate renewable energy goals, particularly the plan of the City of Kansas City which, when enacted into law by ordinance may become a legal mandate within the meaning of 4 CSR 240-22.060(3)(A).

RESPONSE: This item applies to KCP&L only. KCP&L can comply with this suggestion. However, it should be noted that this is a Resolution, rather than a mandate or law, which states that the City will look to evaluate the potential to become 100% renewable.

4. Analyzing and documenting the future capital and operating costs faced by each GMO coal-fired generating unit in order to comply with all existing, pending, or potential environmental standards, including:

- a. Clean Air Act New Source Review provisions;*
- b. 1-hour Sulfur Dioxide National Ambient Air Quality Standard;*
- c. National Ambient Air Quality Standards for ozone and fine particulate matter;*
- d. Cross-State Air Pollution Rule, including the anticipated 2016 update to the rule to incorporate interstate transport requirements for the 2008 ozone National Ambient Air Quality Standard;*
- e. Mercury and Air Toxics Standards;*
- f. Clean Water Act Section 316(b) Cooling Water Intake Standards;*
- g. Clean Water Act Steam Electric Effluent Limitation Guidelines;*
- h. Coal Combustion Waste rules;*
- i. Clean Air Act Section 111(d) Greenhouse Gas standards for existing sources; and*
- j. Clean Air Act Regional Haze requirements.*

RESPONSE: The Company can comply with this suggestion.

5. Analyzing and documenting the cost of any transmission grid upgrades or additions needed to address transmission grid reliability, stability, or voltage support impacts that could result from the retirement of any existing GMO coal-fired generating unit;

RESPONSE: Retirement of any of the larger GMO coal fired generators would necessitate the replacement of that supply with some other resource. It is not possible to identify all the necessary transmission upgrades that might be associated with retirement of a specific generating unit without knowing the specific location of the replacement generation. From the transmission perspective, the most advantageous location for replacement generation is the site of the retired generation where the transmission capacity utilized by the retired generation would be available for new resources. It is not appropriate to include this suggestion as a special contemporary issue and the Commission should exclude this proposed issue from the final list of such issues.

6. Analyzing and documenting on a unit-by-unit basis the net present value revenue requirement of the relative economics of continuing to operate each GMO coal-fired generating unit versus retiring and replacing each such unit in light of all of the environmental, capital, fuel, and O&M expenses needed to keep each such unit operating as compared to the cost of other demand-side and supply side resources;

RESPONSE: The Company disagrees with this issue and the Commission should exclude this proposed issue from the final list of suggested issues. The IRP is not a process by which individual assets are analyzed. The Company shall test for the benefit of coal unit retirements in an integrated manner as specified by Chapter 22 rules. This same request by Sierra Club was rejected by the Commission for inclusion in the 2016 IRP Annual update.

7. Analyzing and documenting the technical, maximum achievable, and realistic achievable energy and demand savings from demand-side management, and incorporating each level of savings into GMO's resource planning process;

RESPONSE: This suggestion does not meet the definition of “special contemporary issue.” It is not an evolving new issue, which may not otherwise have been addressed by the Company.

Except for the inclusion of the Technical Potential in the “resource planning process”, everything suggested in this Special Contemporary Issue is already required under 4CSR 240-22.050. Inclusion of the Technical Potential in the “resource planning process” is non-sensical because it is a purely theoretical construct that includes the entire universe of measures “disregarding all non-engineering constraints such as cost-effectiveness and the willingness of end-users to adopt the efficiency measures”¹. It does not reflect a level of savings that could ever be achieved.

The request first asks that three levels of DSM be analyzed and documented. These levels are the 1) Technical Potential, 2) Maximum Achievable Potential (MAP), and 3) Realistic Achievable Potential (RAP). These levels of DSM are already documented in the Company's most recent DSM potential study as required by 4 CSR 240-22.050(2) and provided in the 2017 annual IRP update. As required by 4 CSR 240.20(3)(A)2., the Company performs a DSM potential study at least every three years. No further documentation is needed.

Second, the request asks that these three levels be incorporated into the resource planning process, presumably referring to the integrated analysis under 4 CSR 240.22.060. As required by 4 CSR 240.22.050 and 240-22.060 the Company already includes the MAP and RAP levels of

¹ National Action Plan for Energy Efficiency, Guide for Conducting Energy Efficiency Potential Studies, pg. 2-4

DSM in the integrated analysis. As defined in 4 CSR 240-22.010(59) the Technical Potential is “...a theoretical construct that assumes all feasible measures are adopted by customers of the utility regardless of cost or customer preference.” The Technical Potential step in a DSM potential study is used for establishing the list of all possible end-use measures prior to screening for cost effectiveness. Inclusion of the Technical Potential, however, would produce a meaningless result. It has no value for incorporation in the integrated analysis. Furthermore, the Company does not have all of the data that would be necessary for incorporation of the Technical Potential into the integrated analysis for the current market potential study. To produce this data would require that the Company to reengage the consultant who conducted the potential study, Applied Energy Group for an additional cost.

Sierra Club has provided no evidence or explanation as to a need to go beyond what is currently required or analyzed. Therefore, it is not appropriate to include this suggestion as a special contemporary issue and the Commission should exclude this proposed issue from the final list of such issues.

8. Analyzing and documenting cost and performance information sufficient to fairly analyze and compare utility scale wind and solar resources, including distributed generation, to other supply side alternatives; and

RESPONSE: The Company can comply with this suggestion.

9. Analyzing the impact of emerging energy efficiency technologies throughout the planning period.

RESPONSE: The Company can comply with this suggestion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 2nd day of October, 2018.

/s/ Roger W. Steiner