

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

In the Matter of the Verified Joint)	
Application of Kansas City Power & Light)	File No. EE-2019-_____
Company and KCP&L Greater Missouri)	
Operations Company for a Variance from)	
Commission Rule 4 CSR 240-20.065 (C))	

**VERIFIED APPLICATION OF KANSAS CITY POWER & LIGHT COMPANY AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY FOR A VARIANCE FROM
THE COMMISSION’S RULE 4 CSR 240-20.065(7)(C) and 4 CSR 240-4.017**

COME NOW Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, “Joint Applicants”) and, pursuant to 4 CSR 240-2.060(4) respectfully request that the Missouri Public Service Commission (“Commission”) grant a limited variance from Commission Rule 4 CSR 240-20.065(7)(C) as well as the 60-day notice requirement of 4 CSR 240-4.017(1), as specifically set forth herein. In support thereof, Joint Applicants state as follows:

I. COMPANY INFORMATION

A. KANSAS CITY POWER & LIGHT COMPANY

1. KCP&L is a Missouri corporation with its principal office and place of business at 1200 Main, Kansas City, Missouri 64105. KCP&L is primarily engaged in the generation, transmission, distribution, and sale of electricity in western Missouri and eastern Kansas, operating primarily in the Kansas City metropolitan area. KCP&L is an “electrical corporation” and “public utility” as those terms are defined in Mo. Rev. Stat. §386.020 (2000) and, as such, is subject to the jurisdiction of the Commission as provided by law. KCP&L provided its Certificate of Good Standing in Case No. EF-2017-0242, which is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G). KCP&L is a wholly owned subsidiary of Evergy, Inc. (“Evergy”).

B. KCP&L GREATER MISSOURI OPERATIONS COMPANY

2. GMO is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. GMO is primarily engaged in the business of providing electric and steam utility service in Missouri to the public in its certificated areas. GMO is an electrical corporation and public utility as defined in Section 386.020 RSMo. A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing the GMO's authority under the law to conduct business in the State of Missouri, was filed with the Commission in Case No. EU-2002-1053 and is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G). GMO's fictitious name registration was filed in Case No. EN-2009-0015 and is incorporated herein by reference. GMO is also a wholly owned subsidiary of Evergy.

3. In addition to the undersigned counsel, all correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

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10. Neither KCP&L nor GMO have any pending actions or final unsatisfied judgments or decisions against them from any state or federal agency or court, which involve customer service or rates, which action, judgment, or decision has occurred within three years of the date of the Application, except for:

1. *KC Emergency Communications Services, Inc. v. Kansas City Power & Light Company*, Docket No. EC-2019-0321.

KCP&L and GMO have no annual reports or regulatory assessment fees that are overdue in Missouri.

II. BACKGROUND

11. The Commission's net metering rule (4 CSR 240-20.065(7)) establishes the process for the application of billing credits to customer bills for electricity generated by a customer-generator that exceeds the electricity supplied by the electric utility during a billing period. Section 7 (C) of the rule provides that credits for excess generation are to be provided in the following billing period. Joint Applicants have been providing net metering credits pursuant to this rule for several years. Recently, the Joint Applicants' billing system changed and the new billing system is configured to provide the excess generation billing credit during the current month instead of the following month.

III. REQUEST FOR VARIANCE-4 CSR 240-20.065(7)(C)

13. Joint Applicants seek a variance of section 4 CSR 240-20.065(7)(C) which requires billing credits to be provided in a later billing period so that Joint Applicants can continue to provide the net metering credits in the current billing period.

14. Joint Applicants believe that the variance is in the public interest as customers receive more timely credits under the Company's current method than they would under the rule.

In light of the more timely credits that are currently provided, Joint Applicants do not believe that it should expend time and effort at changing its billing system to that the credits appear on the following month's bill. As such, pursuant to the provisions of 4 CSR 240-20.060(4), KCP&L and GMO request that the Commission grant a variance from the Commission's Rule 4 CSR 240-20.065(7)(C). Specifically, Joint Applicants request the following:

- a. That they be permitted to continue its practice of issuing net metering bill credits in the month that the credits are earned.
- b. Joint Applicants request that the variance become effective as soon as practicable.

15. Joint Applicants are not aware of any public utility that will be impacted by the granting of this application.

IV. REQUEST FOR VARIANCE-4 CSR 240-4.017(1)

16. Joint Applicants seek a waiver of the notice requirement in 4 CSR 240-4.017(1) which requires notice be filed with the Commission a minimum of 60 days prior to the filing of a case. Section D of the rule permits a party to request a waiver of this section for good cause which may include a verified declaration that the Company has had no communication with the office of the Commission within 150 days of the case filing regarding any substantive issues likely to arise in the case. The attached verification contains this declaration.

WHEREFORE, Joint Applicants respectfully request that the Commission grant a limited variance from Commission Rule 4 CSR 240-20.065 (7)(C) and 4 CSR 240-4.017(1), as described above, for good cause and to be effective as soon as reasonably practicable.

Respectfully submitted,

/s/ Roger W. Steiner

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Attorneys 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 has been hand-delivered, emailed or mailed, First Class, postage prepaid, this 23rd day of May 2019 to:

Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

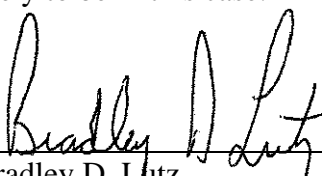
/s/ Roger W. Steiner

Roger W. Steiner

VERIFICATION

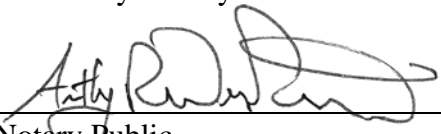
STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

Bradley D. Lutz, being first duly sworn, on his oath and in his capacity as Senior Manager—Regulatory Affairs, states that he is authorized to execute on behalf of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (collectively (“Applicant”), this Application, and has knowledge of the matters stated in this application, and that said matters are true and correct to the best of his knowledge and belief. Applicant has had no communication with the office of the Commission within 150 days before the filing of this Application regarding any substantive issue likely to be in this case.



Bradley D. Lutz

Subscribed and sworn to before me this 23rd day of May 2019.



Notary Public

My Commission Expires: 4/26/2021

