

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

In the Matter of Renew Missouri's	)	
Petition for Amendment of Commission	)	File No. EX-2019-0378
Rule 4 CSR 240-20.060	)	

**COMMENTS OF KANSAS CITY POWER & LIGHT COMPANY AND  
KCP&L GREATER MISSOURI OPERATIONS COMPANY**

Kansas City Power & Light Company ("KCP&L-MO") and KCP&L Greater Missouri Operations Company ("GMO") (collectively, "KCP&L" or "the Company") hereby submit these comments to the filed comments received in this working case as ordered by the Missouri Public Service Commission's ("Commission") *Order Directing Staff Investigation and Recommendation* issued on June 4, 2019.

**BACKGROUND**

1. On May 31, 2019, Renew Missouri Advocates a/b/a Renew Missouri filed a petition asking the Commission to amend its cogeneration rule, 4 CSR 240-20.060. On June 4, 2019, the Commission issued its Order Directing Staff Investigation and Recommendation requesting that Staff investigate Renew Missouri's Rulemaking Petition and recommend whether the Commission should proceed with a rulemaking by July 9, 2019. The Commission also invited written comments from any other person or entity wishing to make a recommendation by July 9, 2019. KCP&L hereby submits comments in response to the Commission's Order Directing Staff Investigation and Recommendation issued in this docket on June 4, 2019.

2. The issues raised by Renew Missouri in its proposed amendment are redundant to the working file (file number EW-2018-0078) that the Commission opened on September 27, 2017, to focus on cogeneration and net metering rules. In that docket, the Company filed

comments on October 16, 2017. Other parties also filed comments, and the Company filed additional amended responsive comments on November 16, 2017.

3. Based on comments received from the Company and other numerous diverse stakeholders, Staff filed a Notice of Draft Rule for Comment on May 22, 2018. On June 15, the Company submitted comments in response to Staff's draft rule. Other parties also submitted comments on June 15, 2018, including joint comments filed by Cypress Creek Renewables and Renew Missouri. On July 26, 2018, the Company, Ameren Missouri, and Empire District Electric Company filed joint comments addressing some of the specific claims and recommendations by Cypress Creek Renewables and Renew Missouri on June 15, 2018. In addition, in response to a Commission Order issued on July 25, 2018, for utilities to evaluate the impacts of standard offer contracts, the Company submitted its response on August 24, 2018.

### **PROPOSED RULEMAKING**

4. Renew Missouri's proposed rulemaking is unnecessary and should be rejected. The suggestions put forth by Renew Missouri in this docket are essentially the same arguments made in the EW-2018-0078 docket where extensive stakeholder comments were filed. The suggested changes put forth by Renew Missouri, originally co-authored by Cypress Creek Renewables, clearly represents the most extreme of the proposals put forth by the various stakeholders and as designed would serve to optimize the self-interest of renewable companies such as the co-author Cypress Creek Renewables.

5. As it stated in its comments filed in EW-2018-0078, the Company believes that the Commission's current rules are working as the Missouri legislature intended when the respective legislation surrounding cogeneration and PURPA was passed. The Company will not restate those arguments again as to why a change in the rules is not needed or why the changes advocated by

Renew Missouri are not appropriate, and refers the Commission to the extensive comments filed in the EW-2018-0078 docket.

6. In the event the Commission is inclined to move forward with a rulemaking to amend 4 CSR 240-20.060 Cogeneration and 4 CSR 240.065 Net Metering rules, the Company suggests the appropriate place to start is with Staff's proposed amendments and rescissions submitted with the Staff Recommendation filed on June 14, 2019. While it does not incorporate all the proposed suggestions submitted by the Company in response to the initial proposed changes issued by Staff on May 22, 2018, the Company believes that Staff's proposal represents a balanced approach resulting from an extensive stakeholder process with several rounds of comments and workshops.

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, postage prepaid, this 9<sup>th</sup> day of July 2019, to all counsel of record.

*/s/ Roger W. Steiner*

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Roger W. Steiner

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