

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

Joint Application of Kansas City Power &            )  
Light Company and KCP&L Greater Missouri        )  
Operations Company for A Variance from the        )        Case No. EE-2019-\_\_\_\_\_  
Provisions of 4 CSR 240-20.065 Regarding Net     )  
Metering.    )

**JOINT APPLICATION**

Comes Now Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively “Applicants”), pursuant to 4 CSR 240-2.060(4), hereby respectfully submit to the Missouri Public Service Commission (“Commission”) a joint application (“Application”) for a variance from the provisions of 4 CSR 240-20.065, to allow the Applicants to remove the “solar rebate application” information from the Net Metering Tariff. In support of their Application, Applicants state as follows:

**I.     APPLICANTS**

1.       KCP&L is a Missouri corporation with its principal office and place of business at One Kansas City Place, 1200 Main, Kansas City, Missouri 64105. KCP&L is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of eastern Kansas and western Missouri. KCP&L is an electrical corporation and public utility as defined in Mo. Rev. Stat. § 386.020 (2016). KCP&L provided its Certificate of Good Standing in Case No. EF-2018-0314, which is incorporated herein by reference.

2.       GMO is a Delaware corporation with its principal office and place of business at One Kansas City Place, 1200 Main, 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 certificate areas. GMO is an electrical corporation and public utility as defined in Mo. Rev. Stat.

§ 386.020 (2016). A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing 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.

3. Applicants have no pending action or final unsatisfied judgments or decisions against them from any state or federal agency or court that involves customer service or rates, which has occurred within three years of the date of this Application except as provided in Attachment No.

1. No annual report or assessment fees are overdue.

4. Pleadings, notices, orders and other correspondence and communications concerning this Application should be addressed to the undersigned counsel and:

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## **II. REQUEST FOR VARIANCE**

5. On August 28, 2018, Section 393.1670 RSMo<sup>1</sup> —which provides that electric utilities shall “make solar rebates available in the amounts specified in this section” - will become effective. The Applicants are submitting revised tariffs intended to implement the requirements of

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<sup>1</sup> Section 393.1670 RSMo was signed into law on June 1, 2018, as part of SB 564.

Section 393.1670 RSMo, including the NET METERING INTERCONNECTION APPLICATION AGREEMENT Tariff (“Net Metering Tariff”) that is the subject of this variance request.<sup>2</sup>

6. As a result of the passage of Section 393.1670 RSMO, the Applicants are requesting a variance to remove the “solar rebate application” information from the Net Metering Tariff. This information is currently required by Sections H. & I. of the “Interconnection Application/Agreement for Net Metering Systems With Capacity of 100 KW or Less” contained in 4 CSR 240-20.065. The Applicants request this variance because it will create a single, online solar rebate application for use by all prospective solar rebate customers irrespective of the method of interconnection that they select (Net Metering or QF). This is both beneficial to customers and administratively necessary for the following reasons:

A. Section 393.1670 RSMo makes solar rebates available for up to 150 KW of capacity, whereas the Net Metering And Easy Connection statute is limited to generation systems not exceeding 100 KW. See Section 386.890(2)(3)(B).

B. Eligibility for Net Metering is also limited by the customer's annual energy consumption. Some customers may “oversize” their system relative to this Net Metering tariff limit and choose to interconnect under the QF tariff.

C. It would be confusing to customers to have unique solar rebate applications and methods for Net Metering and QF interconnections. The Applicants anticipate that customers will not know their maximum allowable system size under Net Metering until they begin the application process. It would be unnecessarily burdensome to customers to make them reapply for a solar rebate through a separate process if it is determined that they do not qualify for Net Metering.

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<sup>2</sup> Concurrent with this Request for Variance, but under a unique tariff tracking file number, the Applicants are also submitting their revised Solar Photovoltaic Rebate Program Schedule SR, as well as Net Metering Interconnection Application Agreement..

D. It would be administratively inefficient to duplicate the solar rebate applications and process for QF customers.

E. Customers and developers will be directed, by the Solar Rebate tariff or other communication channels to access the solar rebate application through kcpl.com. Having the solar rebate application continue to be part of the Net Metering tariff could very well mislead customers into inferring that is an appropriate way to apply for a solar rebate. While paper solar rebate applications will be allowed, they will be discouraged and will result in a delay in receiving a “Qualification Date” which establishes their position in the solar rebate queue.

**WHEREFORE**, for the foregoing reasons, KCP&L and GMO respectfully request that the Commission grant them a variance from 4 CSR 240-20.065 to permit them to remove the “solar rebate application” information from the Net Metering Tariffs described herein.

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 27<sup>th</sup> day of August 2018, to:

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

Office of the Public Counsel  
200 Madison Street, Suite 650  
Jefferson City, MO 65102

*/s/ Roger W. Steiner*

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Roger W. Steiner

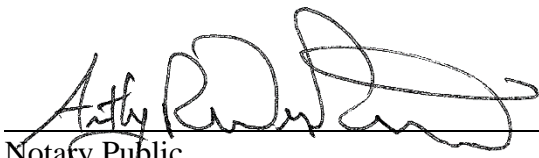
**AFFIDAVIT**

State of Missouri     )  
                                  ) ss  
County of Jackson    )

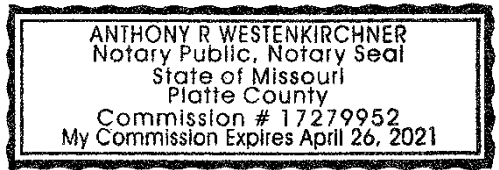
I, Lois J. Liechti, having been duly sworn upon my oath, state that I am the Director, Regulatory Affairs of Kansas City Power & Light Company (“KCP&L”), that I am duly authorized to make this affidavit on behalf of KCP&L and GMO, and that the matters and things stated in the foregoing joint application are true and correct to the best of my information, knowledge and belief.

  
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Lois J. Liechti

Subscribed and sworn before me this 27<sup>th</sup> day of August 2018.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 4/26/2021



**ATTACHMENT NO. 1 – CUSTOMER COMPLAINTS IN MISSOURI**

Kansas City Power & Light Company

None.

KCP&L Greater Missouri Operations Company

*James Dickson and Angela Dickson v. KCP&L Greater Missouri Operations Company*, File No. EC-2016-0230. Please note that the Commission issued its *Report and Order* in this docket on August 22, 2018 denying the Complaint. The effective date of the *Report and Order* is September 21, 2018 and the file will close on September 22, 2018.