

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

In the Matter of an Investigation of Missouri	)	
Jurisdictional Generator Self-Commitments into	)	File No. EW-2019-0370
SPP and MISO Day-Ahead Energy Markets	)	

**JOINT RESPONSE TO  
SIERRA CLUB’S INITIAL COMMENTS**

COME NOW Kansas City Power & Light Company (“KCP&L”), KCP&L Greater Missouri Operations Company (“GMO”), and Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”)(collectively “Joint Respondents”) and, for their *Joint Response to Sierra Club’s Initial Comments* filed with the Missouri Public Service Commission (“Commission”) on June 28, 2019 in this docket, state as follows:

1. In its June 5, 2019, *Order Opening an Investigation of Missouri Jurisdictional Generator Self-Commitments and Self-Scheduling*, the Commission directed its Staff to begin an investigation into the self-commit and self-scheduling practices of Missouri’s investor owned electric utilities. The Commission requested that the electric utilities submit information to Staff for its report and to consult with Staff if additional information is needed by Staff. KCP&L, GMO, and Ameren Missouri have provided information to Staff, both as a result of the June 5 Order and/or after discussions with Staff. The Commission also established this file as a repository for documents and comments.

2. Joint Respondents do not believe that Sierra Club’s request for additional information on p. 5 of Sierra Club’s initial comments should be ordered by the Commission. For the majority of the information requested by Sierra Club, Joint Respondents are already providing this information to Staff so that it can complete its investigation. The Sierra Club’s request is basically a request for two additional years of information. Joint Respondents do not believe that this additional information is needed and it has not been requested by Staff.

3. Moreover, Sierra Club's request goes beyond the scope outlined by the Commission in its June 5, 2019 Order. On p. 2 of its Order, the Commission indicated that anyone with an interest in this matter may submit responsive comments or documents. Sierra Club's request for additional information goes beyond the role established by the Commission for interested parties in this case.

WHEREFORE, KCP&L, GMO, and Ameren Missouri request that the Commission take notice of this *Joint Response to Sierra Club's Initial Comments*.

Respectfully submitted,

/s/ Robert J. Hack

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**ATTORNEYS FOR UNION ELECTRIC  
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### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed or mailed, postage prepaid, this 17<sup>th</sup> day of July 2019, to all counsel of record.

/s/ Robert J. Hack

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