

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

In the Matter of Kansas City Power & Light )  
Company's Submission of Its 2018 Renewable ) File No. EO-2019-0315  
Energy Standard Compliance Report )

In the Matter of KCP&L Greater Missouri )  
Operations Company's Submission of Its 2018 ) File No. EO-2019-0316  
Renewable Energy Standard Compliance Report )

In the Matter of Kansas City Power & Light )  
Company's Submission of Its 2019 Renewable ) File No. EO-2019-0317  
Energy Standard Compliance Plan )

In the Matter of KCP&L Greater Missouri )  
Operations Company's Submission of Its 2019 ) File No. EO-2019-0318  
Renewable Energy Standard Compliance Plan )

**KANSAS CITY POWER & LIGHT COMPANY'S AND KCP&L GREATER MISSOURI  
OPERATIONS COMPANY'S RESPONSE TO COMMENTS OF PUBLIC COUNSEL**

COME NOW Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") (collectively the "Company"), and for their response to *Comments of the Missouri Office of the Public Counsel* ("OPC"), state as follows:

1. On May 30, 2019, OPC filed its initial comments. On June 12, 2019, OPC filed its updated comments.

2. The Company disagrees with OPC's contention that it is not in compliance with Rules 4 CSR 240-20.100(8)(A)1.P and 4 CSR 240-20.100(8)(B)1.F. These rules require the calculation of the renewable energy standard ("RES") retail rate impact. The Company has accurately provided the retail rate impact in its RES Reports and Plans already filed and did not include the costs of wind purchase power agreements ("PPAs") in its calculations as they are costs not directly attributable to RES compliance.

3. The RES retail rate impact limit calculation requires that it, "...may not exceed one percent (1%) for prudent costs of renewable energy resources directly attributable to RES compliance."<sup>1</sup> As the Company stated in its RES Plan:

KCP&L executed 20-year PPAs for wind facilities in-service[...]...[T]hese wind contracts were entered because of favorable economics to take advantage of low-cost energy prices and not directly attributable to RES compliance. These PPAs will also be used to meet future KCP&L non-solar RES requirements.<sup>2</sup>

A similar statement was made in the GMO RES Plan.

4. The Company has stated the same (or similar) in plan years 2018, 2017, and 2016.

5. Staff ("Staff") for the Missouri Public Service Commission ("Commission") agrees that the Company's RES Reports and Plans are in compliance with the rule and specifically noted that, the Company "does not consider the wind PPAs as directly attributable to RES compliance due to their favorable economics."<sup>3</sup>

6. The Company believes that the retail rate impact information presented is accurate, complies with the Commission rules and does not need to be updated.

WHEREFORE, the Company respectfully submits this response to the Commission and requests that this docket be closed.

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<sup>1</sup> 4 CSR 240-20.100(5)(A).

<sup>2</sup> See, *KCP&L 2019 Annual Renewable Energy Standard Compliance Plan*, Section 2.5, p. 8, dated April 15, 2019 and *GMO 2019 Annual Renewable Energy Standard Compliance Plan*, Section 2.5, p. 7, dated April 15, 2019.

<sup>3</sup> See, *Staff Memorandum* p. 7, File No. EO-2019-0317, dated May 30, 2019 and *Staff Memorandum* p. 6, File No. EO-2019-0318, dated May 30, 2019.

Respectfully submitted,

*/s/ Roger W. Steiner*

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**Attorney 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 14<sup>th</sup> day of June 2019, to all parties of record.

*/s/ Roger W. Steiner*

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Roger W. Steiner