

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

In the Matter of Kansas City Power & Light)
Company's Submission of Its 2015 Renewable) File No. EO-2016-0280
Energy Standard Compliance Report)

In the Matter of KCP&L Greater Missouri)
Operations Company's Submission of Its 2015) File No. EO-2016-0281
Renewable Energy Standard Compliance Report)

In the Matter of Kansas City Power & Light)
Company's Submission of Its 2016 Renewable) File No. EO-2016-0282
Energy Standard Compliance Plan)

In the Matter of KCP&L Greater Missouri)
Operations Company's Submission of Its 2016) File No. EO-2016-0283
Renewable Energy Standard Compliance Plan)

**RESPONSE OF KANSAS CITY POWER & LIGHT COMPANY AND KCP&L
GREATER MISSOURI OPERATIONS COMPANY TO RENEW MISSOURI'S
AND UNITED FOR MISSOURI, INC.'S COMMENTS**

COME NOW Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (collectively, "KCP&L") and provides their response to the comments of Earth Island Institute d/b/a Renew Missouri ("Renew Missouri") and United for Missouri, Inc. ("UFM") filed with the Missouri Public Service Commission ("Commission") on May 27, 2016, and states as follows:

I. RESPONSE TO COMMENTS OF RENEW MISSOURI

1. KCP&L has complied with the 1% Retail Rate Impact ("RRI") calculation requirements using the Retail Rate Impact (RRI) calculation as prescribed in 4 CSR 240-20.100(5). Per 4 CSR 240-20.100(5)(B)1 the non-renewable generation and purchased power portfolio shall be determined by adding to the utility's existing generation and purchased power resource portfolio, excluding all renewable resources, additional non-renewable resources sufficient to meet the utility's needs on a least-cost basis for the next ten (10) years. Contrary to

Renew Missouri's assertion, KCP&L's Compliance Report and Plan contained a non-renewable portfolio described per the Rule above. With the removal of the existing renewable resources from the non-renewable portfolio and SPP's change to reserve margin requirements, KCP&L has sufficient capacity to meet the utility's resource requirements for the next ten years. Therefore, no fossil fuel resources are required to be added to the non-renewable portfolio to replace the excluded renewable resources.

2. As KCP&L correctly made its RRI calculation, it does not believe that a workshop is necessary as suggested by Renew Missouri.

II. RESPONSE TO COMMENTS OF UFM

2. The Company disagrees that its 2016 Renewable Energy Standard Compliance Plan ("RES Plan") is deficient as alleged by UFM. Section 2.1.2 of KCP&L's RES Plan provides that SRECs will be acquired from KCP&L retail customers that have received rebates for solar facility installations. Thus, this is the least cost option, since KCP&L obtained the SRECs as a condition of providing the customer a solar rebate. 4 CSR 240 20.100(8)(B) provides that KCP&L's plan provide this SREC compliance information "at a minimum." KCP&L also provided information regarding other potential ways that it could obtain SRECs such as through its own solar installations while at the same time gaining experience with solar station technologies and their impact on the distribution grid. The rule does not prohibit KCP&L from listing these alternatives in its RES Plan and the Commission has approved of KCP&L Greater Missouri Operation's application for a certificate of convenience and necessity to construct a solar generating plant to give it hands-on experience with building and operating solar facilities.¹ Thus, KCP&L's plan, which relies on SRECs that have already

¹ See Report and Order, EA-2015-0256, March 12, 2016.

been purchased from existing customers as well as construction of small utility scale solar facilities is the least cost, prudent way to achieve compliance with the RES. UFM's allegations are without merit.

WHEREFORE, KCP&L requests the Commission consider the above responses by KCP&L to the comments of Renew Missouri and UFM and to find that KCP&L's RES Compliance Plan and Report meet the Commission's requirements.

Respectfully submitted,

/s/ Roger W. Steiner

Robert J. Hack, MBN 36496

Phone: (816) 556-2791

E-mail: rob.hack@kcpl.com

Roger W. Steiner, MBN 39586

Phone: (816) 556-2314

E-mail: roger.steiner@kcpl.com

Kansas City Power & Light Company

1200 Main – 19th Floor

Kansas City, Missouri 64105

Fax: (816) 556-2110

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 13th day of June, 2016, to all parties of record.

/s/ Roger W. Steiner

Roger W. Steiner