

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

In the Matter of the Consideration of Adoption)
Of the PURPA Section 111(d)(15) Interconnection) Case No. EO-2006-0497
Standard as Required by Section 1254 of the)
Energy Policy Act of 2005)

**POSITION STATEMENT OF
KANSAS CITY POWER & LIGHT COMPANY'S
EXPERT WITNESS**

Pursuant to 4 CSR 240-2.080 and the order issued by the Missouri Public Service Commission ("Commission") on March 15, 2007 in the above-captioned proceeding, Kansas City Power & Light Company ("KCPL") hereby provides the Position Statement of Harold Wyble to the threshold question of the applicability of the prior state action exemption to the adoption of the PURPA noted in this proceeding. In support thereof, KCPL states as follows:

1. In compliance with the Energy Policy Act of 2005 (the "Act"), the Commission established this case to consider the implementation of certain standards under the Public Utility Regulatory Policies Act ("PURPA").

2. In the order issued by the Commission in this proceeding on March 15, 2007, the Commission ordered that the parties file with the Commission position statements from their identified experts, outlining the expert's position on the applicability of the prior state action exemption to the adoption of the PURPA standards noted in each respective case caption, and articulating the reasons for supporting those positions.

3. The Commission directed the parties to this case to submit a response to the questions quoted above by no later than April 13, 2006.

4. In response to the Commission's Order, KCPL states its position (as will be articulated by Harold Wyble) that this proceeding can be closed based on prior state actions. As

required by Section 1254(b)(3) of the Act, KCPL believes that the Commission has adequately considered and implemented interconnection standards through its promulgation of 4 CSR 240-20.060 (Cogeneration). Section 386.887 RSMO 2005 (the "Consumer Clean Energy Act") and the Commission's implementing rule (4 CSR 240-20.065) govern interconnection of customer-owned renewable generation sources less than 100 kW.

5. To comply with this regulation, KCPL filed a "Parallel Generation Contract Service" (schedule PG) as part of its Missouri Retail Service Area tariff. KCPL maintains that the interconnection standards set forth in the Southwest Power Pool (SPP) and Federal Energy Regulatory Commission (FERC) procedures, which KCPL references in its Connection Standards, adequately and comprehensively address the interconnection of generation facilities with KCPL's system. Although the FERC's Small Generator Interconnection Agreement ("SGIA") and Small Generator Interconnection Procedures ("SGIP") only applies to facilities subject to the FERC's jurisdiction, KCPL believes that adoption by the MPSC of separate standards will likely lead to confusion and inconsistency.

6. KCPL has developed a "Facility Connection Standards" document that is available to the public on its website. This document complies with NERC Reliability Standard FAC-001-0 by providing technical information and diagrams about the equipment required to interconnect customer generation to the KCPL distribution or transmission system. It also includes information for interconnection of transmission and distribution facilities to KCPL. The Connection Standards cover three different scenarios in which a generation facility may seek to interconnect with KCPL's system—

- (i) a facility with more than 20 MW of generation capacity that will be used to sell power at wholesale;
- (ii) a facility with 20 MW or less of generation capacity that will be used to sell power at wholesale; and
- (iii) a facility that will operate in parallel with KCPL's facilities.

7. Specifically, the Connection Standards provide as follows:

"For Owners connecting generators larger than 20 MW and desiring to sell electricity at wholesale, this agreement shall comply with the form and provisions of the SPP Standard Large Generator Interconnection Agreement. For Owners connecting generators 20 MW or smaller, and desiring to sell electricity at wholesale, the agreement shall comply with the form and provisions of the small generator interconnection agreement as established by the FERC. Owners connecting generators to operate in parallel with KCPL facilities to supply all or part of Owner's electric load may take service under the "Parallel Generation Contract Service" (schedule PG) filed as part of KCPL's Missouri Retail Service Area tariff.

8. Although KCPL believes that this case can be closed based on prior state actions, if the Commission determines that it is necessary to continue the proceeding, KCPL believes that the Commission should undertake a notice and comment rulemaking proceeding. Such rulemaking proceedings should be limited to mandating that interconnection services shall be offered based upon the standards developed by the Institute of Electrical and Electronics Engineers: IEEE Standard 1547 for Interconnecting Distributed Resources with Electric Power Systems, as they may be amended from time to time, as discussed in Section 111(d)(15) or 16 U.S.C. § 2621(d)(15).

WHEREFORE, KCPL respectfully provides its Position Statement in response to the Commission's March 15, 2007 Order in the above-captioned matter.

Respectfully submitted,

/s/ James M. Fischer

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing Position Statement was served to all persons on the official service lists in the above-referenced cases via electronic filing and electronic mail (e-mail) on this 13th day of April, 2007.

/s/ James M. Fischer

James M. Fischer