

b. What generation resources are included in the Renewable Energy Standard (“RES”) -compliant portfolio when completing the retail rate impact calculation under Rule 4 CSR-20.100(5)(B)?

c. Are both the non-renewable and RES-compliant portfolios averaged over ten years when completing the retail rate impact calculation under Rule 4 CSR 240-20.100 (5)(B)?

d. Must an electric utility’s most current adopted preferred resource plan be used for determining the renewable energy resource additions to the RES-compliant portfolio when completing the retail rate impact calculation under Rule 4 CSR 240-20.100(5)(B)?

e. What cost of solar rebates paid in a calendar year must an electric utility include (i.e. total cost, 1/10 of cost) in determining the retail rate impact calculation under Rule 4 CSR 240-20.100(5)(B)?

f. Does Rule 4 CSR 240-20.100 (5)(B) require an incremental or a cumulative approach be used when determining the retail rate impact calculation, or does it allow either to be used?

g. Does Rule 4 CSR 240-20.100 (5)(B) require an annual or average (multi-year) approach be used when determining the retail rate impact calculation, or does it allow either to be used?

2. What is the one percent retail rate impact (1%) amount when calculated by the method the Commission determines in Issue one (1) is the correct method ?

3. Are the sums of solar rebate payments GMO has made and those it projects to pay by the end of 2013, greater than the one percent (1%) retail rate impact amount determined in Issue two (2) above?

4. Do the RES statute, Section 393.1030 et seq., or the RES Rule, 4 CSR 240-20.100, create a preference for paying solar rebates or for complying with the renewable portfolio requirements?

5. Should the Commission authorize GMO to stop making solar rebate payments beginning by no later than November 3, 2013, in order to comply with Section 393.1030.2(1) and .3 RSMo (Cum. Supp.2013) and 4 CSR 240-20.100(5)?

6. Should payment of solar rebates be “front-loaded,” and any payments above the 1% RRI cap be deferred through the establishment of a regulatory asset and recovery of carrying costs, as suggested by Brightergy and MOSEIA?

7. If solar rebate payments are suspended, what pending solar rebates will be paid, and when will these payments occur?

8. Should the Commission order GMO and its affiliates to retain all documents pertaining to solar rebate payments and the calculation of the cap so the documents will be available for use in future ratemaking proceedings that address possible recovery of GMO expenditures related to compliance with §393.1030 RSMo and 4CSR 240-20.100?

9. Should the Commission make a determination in this case of whether GMO’s prudently-incurred expenditures on solar rebate payments be expensed or amortized? If yes, what determination should the Commission make?

10. Should the Commission make a determination in this case of the appropriate amortization period for GMO’s prudently-incurred expenditures on solar rebate payments? If yes, what determination should the Commission make?

II. Suggested Order of Opening Statements

1. GMO
2. Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”)
3. Staff
4. Public Counsel (“OPC”)
5. Missouri Division of Energy (“MDE”)
6. Renew Missouri
7. Missouri Solar Energy Industry Association (“MOSEIA”)
8. Brightergy, LLC (“Brightergy”)
9. Missouri Industrial Energy Consumers (“MIEC”)
10. Wind on Wires

III. Witness List And Order of Witnesses

Thursday, October 3, 2013

A. GMO

1. Tim M. Rush
2. Burton Crawford

B. Ameren Missouri

1. Matt Michels

C. Staff

1. Claire Eubanks
2. Mark Oligschlaeger
3. Dan Beck

D. OPC witness

1. Ryan Kind

E. MDE

1. Brenda Wilbers

F. Renew Missouri

1. P.J. Wilson

G. MOSEIA

1. Ezra D. Hausman

H. Brightergy

1. Adam Blake

I. MIEC

1. Maurice Brubaker

Friday, October 4, 2013

(Complete remaining witnesses, if necessary)

IV. ORDER OF CROSS-EXAMINATION

The order of cross-examination, based generally on adversity, is the following:

GMO witnesses

Ameren Missouri, MIEC, MDE, Renew Missouri, Wind on Wires, OPC, Staff, Brightergy, MOSEIA

Ameren Missouri witness

GMO, MIEC, MDE, Renew Missouri, Wind on Wires, OPC, Staff, Brightergy, MOSEIA

Staff witnesses

MIEC, MDE, Renew Missouri, Wind on Wires, OPC, Brightergy, MOSEIA. Ameren Missouri, GMO.

Public Counsel witness

MIEC, MDE, Renew Missouri, Wind on Wires, Staff, Brightergy, MOSEIA. Ameren Missouri, GMO.

MDE witness

Renew Missouri, MIEC, Wind on Wires, OPC, Staff, Brightergy, MOSEIA. Ameren Missouri, GMO.

Renew Missouri witness

Brightergy, MOSEIA, MIEC, MDE, Wind on Wires, OPC, Staff, Ameren Missouri, GMO.

MOSEIA

Brightergy, Renew Missouri, MIEC, MDE, Wind on Wires, OPC, Staff, Ameren Missouri, GMO.

Brightergy witnesses

MOSEIA, Renew Missouri, MIEC, MDE, Wind on Wires, OPC, Staff, Ameren Missouri, GMO.

MIEC witness

MDE, OPC, Staff, Renew Missouri, Wind on Wires, Brightergy, MOSEIA, Ameren Missouri, GMO.

WHEREFORE, GMO, on behalf of itself and other parties, hereby submits the List of Issues, Order of Opening Statements, Order of Witnesses, and Order of Cross-Examination for consideration by the Commission.

Respectfully submitted,

/s/ James M. Fischer

James M. Fischer, MBN 27543

Fischer & Dority, P.C.

101 Madison—Suite 400

Jefferson City, MO 65101

Phone: (573) 636-6758 ext. 1

Email: jfischerpc@aol.com

Roger W. Steiner, MBN 39586

Kansas City Power & Light Company

1200 Main—16th Floor

Kansas City, Missouri 64105

Phone: (816) 556-2314

Fax: (816) 556-2110

Email: roger.steiner@kcpl.com

Attorneys for KCP&L Greater Missouri Operations
Company

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 27th day of September, 2013.

/s/ James M. Fischer
James M. Fischer