

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

In the Matter of Kansas City Power & Light            )  
Company's Submission of Its 2014 Renewable        )        File No. EO-2015-0263  
Energy Standard Compliance Report                )

In the Matter of KCP&L Greater Missouri            )  
Operations Company's Submission of Its 2014        )        File No. EO-2015-0264  
Renewable Energy Standard Compliance Report    )

**KANSAS CITY POWER & LIGHT COMPANY AND  
KCP&L GREATER MISSOURI OPERATIONS COMPANY'S RESPONSE  
TO STAFF REPORTS ON 2014 RES COMPLIANCE REPORTS**

COME NOW Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") (collectively, the "Company") and provides their response to the June 5, 2015 report of the Missouri Public Service Commission ("Commission") Staff ("Staff") which outlines deficiencies associated with S-RECs.

1. On April 15, 2015 the Company requested, and the Commission granted, an extension of the deadline to file its 2014 Annual Renewable Energy Standard Compliance Report to April 22, 2015.

2. On April 22, 2015, KCP&L and GMO filed their 2014 Renewable Energy Standard ("RES") Compliance Reports and Request for Waivers ("RES Report").

3. On May 20, 2015, the Commission issued its Order and Notice, directing the Staff to file a report of its review of the Company's RES Reports on or before June 5, 2015.

4. On June 5, 2015 the Staff filed: 1) Staff Report on Kansas City Power & Light Company's 2014 RES Compliance Report and 2) Staff Report on KCP&L Greater Missouri Operations' 2014 RES Compliance Report. Both reports outlined the following deficiencies:

14. Rule 4 CSR 240-20.100(7)(A)1.E. requires that an Annual RES Compliance Report account for "[t]he number of RECs acquired, sold, transferred, or retired by the utility during the calendar year." KCP&L [GMO] has failed to account for S-RECs acquired from customer-generators through its rebate program as identified in its tariff, and therefore has failed to comply with this requirement.

15. Rule 4 CSR 240-20.100(7)(A)1.F. requires that an Annual RES Compliance Report disclose “[t]he source of all RECs acquired during the calendar year.” KCP&L [GMO] has failed to identify the source for S-RECs purchased from customer-generators through its rebate program as identified in its tariff, and therefore has failed to comply with this requirement.
16. Rule 4 CSR 240-20.100(7)(A)1.G. requires that an Annual RES Compliance Report disclose “[t]he identification, by source and serial number, of any RECs that have been carried forward to a future calendar year.” KCP&L [GMO] has failed to identify the source and serial number for S-RECs purchased from customer-generators through its rebate program as identified in its tariff that it is carrying forward to a future calendar year, and therefore has failed to comply with this requirement.

Additionally, the Staff requested that the Commission order the Company to file with the Commission a complete report that includes the information required by 4 CSR 240-20.100(7)(A)1.E, F, and G no later than August 31, 2015.

5. On June 16, 2015 the Commission issued an Order Granting Staff Motions ordering KCP&L and GMO to respond as requested by Staff no later than August 31, 2015.

6. KCP&L and GMO file herewith updated 2014 Annual Renewable Energy Standard Compliance Reports.

WHEREFORE, the Company requests the Missouri Public Service Commission accept the aforementioned updated reports.

*/s/ Roger W. Steiner*

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**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 31<sup>st</sup> day of August, 2015, to all parties of record.

*/s/ Roger W. Steiner*

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Roger W. Steiner