

Deficiency 5 – The only requirements of Rule 4 CSR 240-22.060 Integrated Resource Plan and Risk Analysis that are satisfied, and described, and documented for each of KCPL’s eight (8) combined/joint candidate resource plans are for integrated resource analysis and the calculation of PVRR for each plan.

Joint Filing November 23rd Resolution

This deficiency is resolved. The Companies will provide all documentation cited in Rule 4 CSR 240-22.060 for GMO and KCP&L candidate resource plans in the next triennial compliance filings. Staff agrees that based on the Companies' current planning process and the use of combined/joint analysis as an additional consideration in the choice of the individual preferred plans, full Rule 4 CSR 240-22.060 documentation of the combined/joint candidate resource plans is not required.

MPSC Staff August 31st GMO Report

Deficiency 8 – All of the filing requirements of rules 4 CSR 240-22.070(2) and 4 CSR 240-22.070(3) were not described and documented for any of the GMO candidate resource plans.

MPSC Staff August 31st KCP&L Report

Deficiency 8 – All of the filing requirements of rules 4 CSR 240-22.070(2) and 4 CSR 240-22.070(3) were not described and documented for any of the fifteen (15) KCPL candidate resource plans.

Joint Filing November 23rd Resolution

This deficiency is resolved. The Companies will provide the documentation cited in Rule 4 CSR 240-22.070(2) and 4 CSR 240-22.070(3) for the GMO and KCP&L preferred plans in the next triennial compliance filings.

MPSC Staff August 31st GMO Report

Deficiency 9 – The only requirements of rule 4 CSR 240-22.070 Resource Acquisition Strategy Selection that were satisfied and described and documented for each of the eight (8) combined/joint candidate resource plans are: 1) analysis and specification of ranges for critical

uncertain factors, and 2) the expected value of better information related to the critical uncertain factors (CO2, load forecast and natural gas prices).

MPSC Staff August 31st KCP&L Report

Deficiency 9 - The only requirements of rule 4 CSR 240-22.070 Resource Acquisition Strategy Selection that were satisfied and described and documented for each of the eight (8) combined/joint candidate resource plans are: 1) analysis and specification of ranges for critical uncertain factors, and 2) the expected value of better information related to the critical uncertain factors (CO2, load forecast and natural gas prices).

Joint Filing November 23rd Resolution

This deficiency is resolved. The Companies will provide all documentation cited in Rule 4 CSR 240-22.070 for GMO and KCP&L preferred resource plans in the next triennial compliance filings. Staff agrees that based on the Companies' current planning process and the use of combined/joint analysis as an additional consideration in the choice of the individual preferred plans, full Rule 4 CSR 240-22.070 documentation of the combined/joint candidate resource plans is not required.

MPSC Staff August 31st GMO Report

Deficiency 10 – GMO's resource acquisition strategy selection process used to select Plan GBBEG as its adopted preferred resource plan does not comply with the minimum requirements of: a) rule 4 CSR 240-22.010(2)(C), because it does not *explicitly identify and, where possible, quantitatively analyze any other considerations which are critical to meeting the fundamental objective of the resource planning process, but which may constrain or limit the minimization of the present worth of expected utility costs*, and b) rule 4 CSR 240-22.070(1), because it does not *describe and document the process used to select the preferred resource plan, including the*

relative weights given to the various performance measures and the rationale used by utility decision-makers to judge the appropriate tradeoffs between competing planning objectives and between expected performance and risk. [Emphasis added]

MPSC Staff August 31st KCP&L Report

Deficiency 10 – KCPL’s resource acquisition strategy selection process used to select Plan KAACA as its adopted preferred resource plan does not comply with the minimum requirements of: a) rule 4 CSR 240-22.010(2)(C), because it does not *explicitly identify and, where possible, quantitatively analyze any other considerations which are critical to meeting the fundamental objective of the resource planning process, but which may constrain or limit the minimization of the present worth of expected utility costs*, and b) rule 4 CSR 240-22.070(1), because it does not *describe and document the process used to select the preferred resource plan, including the relative weights given to the various performance measures and the rationale used by utility decision-makers to judge the appropriate tradeoffs between competing planning objectives and between expected performance and risk.*[Emphasis added]

Joint Filing November 23rd Resolution

This deficiency is resolved. The Companies will provide the documentation cited in Rule 4 CSR 240-22.010(2)(C) and 4 CSR 240-22.070(1) for the GMO and KCP&L preferred plans in the next triennial compliance filings. The Companies will use a scorecard or some other means of compliance should the adopted preferred resource plan not be the low cost plan as defined by the present worth of long-run utility costs.

WHEREFORE, the Staff and the Companies request that the Commission accept this joint filing.

Respectfully submitted,

/s/ Nicole Mers

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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, transmitted by e-mail, or mailed, First Class, postage prepaid, this 24th day of November 2015, to counsel for all parties on the Commission's service list in this case.

/s/ Roger W. Steiner

Roger W. Steiner