

In the Matter of An Application for a )  
Variance from CSR 240-20.065 Regarding ) Case No \_\_\_\_\_  
Net Metering Tariffs )

Pursuant to 4 C.S.R. 240-2.060 and -2.015, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (“KCP&L” or “Company”) hereby respectfully submit to the Missouri Public Service Commission (“Commission”) an application (“Application”) for variance concerning the tariff filing requirement of the Commission’s net metering rule as set forth in 4 CSR 240-20.065(B). Good cause exists for this variance. In support of its Application, KCP&L offers as follows:

1. KCP&L is a Missouri corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. KCP&L is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of eastern Kansas and western Missouri. KCP&L is an electrical corporation and public utility as defined in Section 386.020, Mo. Rev. Stat. (2000), as amended.<sup>1</sup> KCP&L provided its Certificate of Good Standing in Case No. EF-2002-315 which is incorporated herein by reference.

2. KCP&L-GMO is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. KCP&L-GMO is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of northwestern Missouri. KCP&L-GMO is an electrical corporation and public utility as defined

<sup>1</sup> All statutory references are to the Missouri Revised Statutes (2000), as amended to date.

in Mo. Rev. Stat. § 386.020 (2000). KCP&L-GMO provided its certificate authorizing it to do business in Missouri as a foreign corporation in Case No. EN-2009-0164. That certificate is incorporated herein by reference pursuant to 4 CSR 240-2.060(G).

3. KCP&L holds Certificates of Convenience and Necessity from the Commission to transact business as an electric public utility in certain areas of the State of Missouri and is principally engaged in the generation, transmission, distribution and sale of electric power and energy. KCP&L has one pending action<sup>2</sup> against it from any state or federal agency or court that involve customer service or rates, which has occurred within three years of the date of this Application. In addition, no annual report or assessment fees are overdue.

4. KCP&L-GMO holds Certificates of Convenience and Necessity from the Commission to transact business as an electric public utility in certain areas of the State of Missouri and is principally engaged in the generation, transmission, distribution and sale of electric power and energy. KCP&L-GMO has one pending action<sup>3</sup> against it from any state or federal agency or court that involve customer service or rates, which has occurred within three years of the date of this Application. In addition, no annual report or assessment fees are overdue.

5. In addition to undersigned counsel, pleadings, notices, orders and other correspondence and communications concerning this Application should be addressed to:

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<sup>2</sup> *Emma J. McFarlin and Rebecca Shepherd v. Kansas City Power and Light Company*, Mo. P.S.C. Case No. EC-2013-0024.

<sup>3</sup> *Ag Processing, Inc. a Cooperative v. KCP&L Greater Missouri Operations Company*, Mo. P.S.C. File No. HC-2012-0259.

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E-mail: Tim.Rush@KCPL.com

6. Data requests should be sent to:

Brad Lutz  
Manager, Regulatory Affairs  
Kansas City Power & Light Company  
1200 Main Street, 19<sup>th</sup> Floor  
Kansas City, Missouri 64105  
Phone: 816 654-1689  
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E-mail: Regulatory.Affairs@KCPL.com

7. On August 30, 2012, amendments to the Commission's net metering rule went into effect. The stated purpose of the amendment is to eliminate various inconsistencies between rule 4 CSR 24020.065 Net Metering and rule 4 CSR 240-20.100 Electric Utility Renewable Energy Standard Requirements and defines the rate that at which the electric utilities must credit customer-generators for the electric energy they generate which exceeds their needs.

8. KCP&L hereby requests a variance until December 1, 2012 to file revisions to its net metering tariff to incorporate these amendments. KCP&L currently credits its customer-generators in accordance with the amendment. As such, no customer-generator will be harmed due to this variance request.

9. Good cause exists for the variance requested herein. Due to the press of other business, KCP&L has not completed its review of the amendments in order to incorporate them in its tariff and file for subsequent approval by the Commission.

10. KCP&L hereby requests a variance until December 1, 2012 to file the necessary revisions to its net metering tariff.

11. For the foregoing reasons, the Company respectfully requests that the Commission grant a variance from 4 CSR 240-20.065(B) so that KCP&L can file its net metering tariffs on December 1, 2012.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MBN 39586

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**Counsel for Kansas City Power & Light  
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Operations Company**

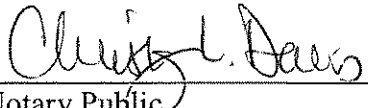
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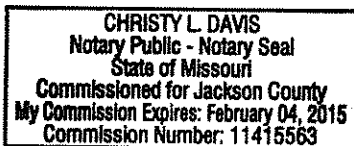
State of Missouri     )  
                                  ) ss  
County of Jackson    )

I, Tim Rush, having been duly sworn upon my oath, state that I am the Director, Regulatory Affairs of Kansas City Power & Light Company ("KCP&L"), that I am duly authorized to make this affidavit on behalf of KCP&L and KCP&L Greater Missouri Operations Company, and that the matters and things stated in the foregoing application are true and correct to the best of my information, knowledge and belief.

  
\_\_\_\_\_  
Tim Rush

Subscribed and sworn before me this 3 day of October, 2012.

  
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Notary Public



## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application was served on all counsel of record either by electronic mail or by first class mail, postage prepaid, on this 3rd day of October, 2012.

/s/ Roger W. Steiner

Roger W. Steiner