

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

In the Matter of the Application of)	
Kansas City Power & Light Company)	
for Permission and Approval and a)	
Certificate of Public Convenience and Necessity)	
Authorizing it to Acquire, Construct, Install, Own,)	
Operate, Maintain and Otherwise Control and)	Case No. EA-2011-0368
Manage Electrical Production and Related)	
Facilities in the Smart Grid Project Area Of)	
Jackson County, Missouri)	
)	

**MISSOURI DEPARTMENT OF NATURAL RESOURCES'
RECOMMENDATION TO APPROVE APPLICATION**

COMES NOW Missouri Department of Natural Resources (MDNR) and submits this Recommendation to Approve Application in response to the Commission's May 11, 2011 *Order Establishing Intervention Date and Directing Staff to File Recommendation (May 11 Order)*.

1. On May 6, 2011, Kansas City Power & Light (KCP&L) filed an application for a certificate of public convenience and necessity to acquire, construct, install, own, operate, maintain, control and manage electrical production and related facilities in the SmartGrid Project Area of Jackson County, Missouri. MDNR filed its timely Application to Intervene in this matter on May 23, 2011. The Commission's *May 11 Order* provided that "Any other party wishing to file a recommendation . . . shall do so no later than May 27, 2011." On May 27, 2011, KCP&L filed an amended application indicating the locations of two of the solar panel projects.

2. MDNR, as stated in its Application to Intervene, supports development and use of Missouri's clean indigenous energy resources, including solar energy, as a matter of sound energy policy. The solar panel installation project (the Project) proposed by KCP&L is consistent with Missouri's Renewable Energy Standard (Section 393.1030, RSMo). It will also help reduce emissions of pollutants by reducing consumption of fossil fuels. KCP&L's Project in the SmartGrid Demonstration Area will be a visible demonstration of the technology. Placement

of the rooftop solar units on a diverse selection of buildings (schools, commercial facilities and residences) distributed throughout the SmartGrid Demonstration Area will increase exposure of the public to this renewable energy alternative. The Project also serves as an example of distributed generation, which contributes to energy security benefits and less stress on the transmission and distribution systems associated with centrally generated electricity.

3. MDNR requests to be served with more specific plans for the Project when KCPL submits them to the Commission, and looks forward to seeing the final Project and its results.

4. MDNR recommends that approval of this application by the date requested by KCP&L is appropriate for the reasons stated in KCP&L's Application. MDNR does not take a position on KCP&L's request for the Commission to disclaim jurisdiction.

WHEREFORE, the Missouri Department of Natural Resources respectfully recommends that the Commission approve the KCP&L's Application.

Respectfully submitted,

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Resources**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 27th day of May, 2011.

/s/ Jennifer S. Frazier