

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

In the Matter of the Application of KCP&L)	<u>File No. ER-2010-0356</u>
Greater Missouri Operations Company for)	Tariff Nos. YE-2011-0567
Approval to Make Certain Changes in its)	and YE-2011-0577
Charges for Electric Service.)	

STAFF RECOMMENDATION TO APPROVE TARIFF SHEETS

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its recommendation to approve tariff sheets states:

1. In ordered paragraph 4 of its May 4, 2011 *Report and Order* the Commission directed Staff to file by May 16, 2011, its recommendation on the tariff sheets KCP&L Greater Missouri Operations Company was to file on May 12, 2011, to comply with the Commission’s *Report and Order*.

2. KCP&L Greater Missouri Operations Company filed tariff sheets on May 12, 2011, at about 5:42 p.m. that it asserted comply with the Commission’s *Report and Order* and moved the Commission to make them effective on June 4, 2011.¹ The following day, Friday, May 13, 2011, Staff advised KCP&L Greater Missouri Operations Company that Staff viewed certain tariff sheets designed to implement KCP&L Greater Missouri Operations Company’s fuel adjustment clause did not comply with the Commission’s *Report and Order*, and that if KCP&L Greater Missouri Operations Company did not want Staff to recommend to the Commission they be rejected, KCP&L Greater Missouri Operations Company needed to withdraw them and file new compliant tariff sheets.

3. While Staff and KCP&L Greater Missouri Operations Company continued to

¹ Among other thing, KCP&L Greater Missouri Operations Company asserted in its motion it would be unlawful for the Commission not to make the tariff sheets effective on June 4, 2011. Staff disagrees with that assertion, but because Staff is recommending the tariff sheets become effective on June 4, 2011, it is not arguing the point.

discuss on Monday, May 16, 2011 how various tariff sheets needed to be changed to comply with the Commission's *Report and Order* it was not until after 5:00 p.m. on Monday May 16, 2011, that KCP&L Greater Missouri Operations Company filed additional fuel adjustment tariff sheets and it did not withdraw the noncompliant sheets until the afternoon of May 17, 2011. While Staff informally advised KCP&L Greater Missouri Operations Company it would need to withdraw certain fuel adjustment clause tariff sheets if it did not want Staff to recommend to the Commission those tariff sheets did not comply with the Commission's *Report and Order*, it was KCP&L Greater Missouri Operations Company who chose to file new tariff sheets on May 16, 2011 and withdraw others on May 17, 2011.

4. In the attached Memorandum (Appendix A), the Staff recommends that the Commission issue an Order that approves the following proposed tariff sheets, as filed on May 12, 2011, to wit:

P.S.C. MO. No. 1 (Table of Contents)

7th Revised Sheet No. 2 Canceling 6th Revised Sheet No. 2

P.S.C. MO. No. 1 (Rates – L&P)

4th Revised Sheet No. 18 Canceling 3rd Revised Sheet No. 18
 4th Revised Sheet No. 19 Canceling 3rd Revised Sheet No. 19
 4th Revised Sheet No. 21 Canceling 3rd Revised Sheet No. 21
 4th Revised Sheet No. 22 Canceling 3rd Revised Sheet No. 22
 4th Revised Sheet No. 23 Canceling 3rd Revised Sheet No. 23
 4th Revised Sheet No. 24 Canceling 3rd Revised Sheet No. 24
 4th Revised Sheet No. 25 Canceling 3rd Revised Sheet No. 25
 4th Revised Sheet No. 28 Canceling 3rd Revised Sheet No. 28
 4th Revised Sheet No. 29 Canceling 3rd Revised Sheet No. 29
 4th Revised Sheet No. 31 Canceling 3rd Revised Sheet No. 31
 4th Revised Sheet No. 34 Canceling 3rd Revised Sheet No. 34
 4th Revised Sheet No. 35 Canceling 3rd Revised Sheet No. 35
 4th Revised Sheet No. 41 Canceling 3rd Revised Sheet No. 41
 4th Revised Sheet No. 42 Canceling 3rd Revised Sheet No. 42
 4th Revised Sheet No. 43 Canceling 3rd Revised Sheet No. 43
 4th Revised Sheet No. 44 Canceling 3rd Revised Sheet No. 44
 4th Revised Sheet No. 47 Canceling 3rd Revised Sheet No. 47

4 th	Revised Sheet No. 48 Canceling 3 rd	Revised Sheet No. 48
4 th	Revised Sheet No. 50 Canceling 3 rd	Revised Sheet No. 50

P.S.C. MO. No. 1 (Rates – MPS)

4 th	Revised Sheet No. 51 Canceling 3 rd	Revised Sheet No. 51
4 th	Revised Sheet No. 52 Canceling 3 rd	Revised Sheet No. 52
4 th	Revised Sheet No. 53 Canceling 3 rd	Revised Sheet No. 53
4 th	Revised Sheet No. 54 Canceling 3 rd	Revised Sheet No. 54
4 th	Revised Sheet No. 56 Canceling 3 rd	Revised Sheet No. 56
4 th	Revised Sheet No. 57 Canceling 3 rd	Revised Sheet No. 57
4 th	Revised Sheet No. 59 Canceling 3 rd	Revised Sheet No. 59
4 th	Revised Sheet No. 60 Canceling 3 rd	Revised Sheet No. 60
4 th	Revised Sheet No. 61 Canceling 3 rd	Revised Sheet No. 61
4 th	Revised Sheet No. 66 Canceling 3 rd	Revised Sheet No. 66
4 th	Revised Sheet No. 67 Canceling 3 rd	Revised Sheet No. 67
4 th	Revised Sheet No. 68 Canceling 3 rd	Revised Sheet No. 68
4 th	Revised Sheet No. 70 Canceling 3 rd	Revised Sheet No. 70
4 th	Revised Sheet No. 71 Canceling 3 rd	Revised Sheet No. 71
4 th	Revised Sheet No. 74 Canceling 3 rd	Revised Sheet No. 74
4 th	Revised Sheet No. 76 Canceling 3 rd	Revised Sheet No. 76
4 th	Revised Sheet No. 79 Canceling 3 rd	Revised Sheet No. 79
4 th	Revised Sheet No. 80 Canceling 3 rd	Revised Sheet No. 80
5 th	Revised Sheet No. 88 Canceling 4 th	Revised Sheet No. 88
5 th	Revised Sheet No. 89 Canceling 4 th	Revised Sheet No. 89
4 th	Revised Sheet No. 90 Canceling 3 rd	Revised Sheet No. 90
5 th	Revised Sheet No. 91 Canceling 4 th	Revised Sheet No. 91
5 th	Revised Sheet No. 92 Canceling 4 th	Revised Sheet No. 92
3 rd	Revised Sheet No. 93 Canceling 2 nd	Revised Sheet No. 93
5 th	Revised Sheet No. 95 Canceling 4 th	Revised Sheet No. 95

P.S.C. MO. No. 1 (Rates – L&P and MPS)

4 th	Revised Sheet No. 103	Canceling 3 rd	Revised Sheet No. 103
4 th	Revised Sheet No. 104	Canceling 3 rd	Revised Sheet No. 104
1 st	Revised Sheet No. 127.1	Canceling	Original Sheet No. 127.1
1 st	Revised Sheet No. 127.2	Canceling	Original Sheet No. 127.2
1 st	Revised Sheet No. 127.3	Canceling	Original Sheet No. 127.3
1 st	Revised Sheet No. 127.4	Canceling	Original Sheet No. 127.4
4 th	Revised Sheet No. 127.5	Canceling 3 rd	Revised Sheet No. 127.5

Original Sheet No. 133

P.S.C. MO. No. 1 (Rules – L&P and MPS)

1 st	Revised Sheet No. R-1	Canceling	Original Sheet No. R-1
	Original Sheet No. R-5A		
1 st	Revised Sheet No. R-20	Canceling	Original Sheet No. R-20
1 st	Revised Sheet No. R-27	Canceling	Original Sheet No. R-27
1 st	Revised Sheet No. R-34	Canceling	Original Sheet No. R-34

and that approves the following proposed tariff sheets, as filed on May 16, 2011, to wit:

P.S.C. MO. No. 1, filed effective June 15, 2011

Original Sheet No. 127.6

Original Sheet No. 127.7

Original Sheet No. 127.8

Original Sheet No. 127.9

Original Sheet No. 127.10

and makes them effective on the requested effective date of June 4, 2011, for good cause as authorized by section 393.140(11), RSMo.—said good cause being their compliance with the Commission’s May 4, 2011, *Report and Order*.

5. As stated in its Memorandum, Staff has verified that KCP&L Greater Missouri Operations Company has filed its 2010 annual report and is not delinquent on its assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, the Staff recommends that the Commission issue an order that approves the proposed tariff sheets specifically identified above and makes them effective, for good cause, on June 4, 2011.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
Deputy Counsel
Missouri Bar No. 35512

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8702 (Telephone)
(573) 751-9285 (Fax)
nathan.williams@psc.mo.gov

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 17th day of May, 2011.

/s/ Nathan Williams

KCP&L-GMO

File No. ER-2010-0356

The new rates per kWh per customer class after the increase

MPS

Sources of Rate Revenue	Energy (kWh)	Total Revenue	New Rate per kWh
RESIDENTIAL	2,769,593,472	\$287,688,417	\$0.10387
SMALL GENERAL SERVICE	798,714,058	\$77,885,003	\$0.09751
LARGE GENERAL SERVICE	942,500,241	\$69,891,586	\$0.07416
LARGE POWER SERVICE	1,386,586,387	\$84,663,666	\$0.06106
SPECIAL THERMAL	7,190,603	\$453,836	\$0.06312
LIGHTING	46,449,844	\$9,070,053	\$0.19527
TOTALS	5,951,034,606	\$529,652,561	\$0.08900

L&P

Sources of Rate Revenue	Energy (kWh)	Total Revenue	New Rate per kWh
RESIDENTIAL	791,740,502	\$74,050,280	\$0.09353
SMALL GENERAL SERVICE	105,716,147	\$12,635,332	\$0.11952
LARGE GENERAL SERVICE	382,945,834	\$29,997,135	\$0.07833
LARGE POWER SERVICE	810,019,714	\$48,198,962	\$0.05950
LIGHTING	22,206,275	\$3,912,082	\$0.17617
TOTALS	2,112,628,473	\$168,793,790	\$0.07990

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2010-0356, Tariff Tracking Nos. YE-2011-0567 and YE-2011-0577
KCP&L Greater Missouri Operations Company

FROM: John Rogers, Utility Regulatory Manager
Mike Scheperle, Manager, Economic Analysis
Mack McDuffey, Rate & Tariff Examiner II

/s/ Curt Wells 05/17/11
Co-Case Coordinator / Date

/s/ Nathan Williams 05/17/11
Staff Counsel Division / Date

SUBJECT: Staff Recommendation For **Approval** Of Tariff Sheets Filed To Comply With
The Commission's May 4, 2011 Report And Order.

DATE: May 17, 2011

On Thursday, May 12, 2011, at 5:42PM, KCP&L Greater Missouri Operations Company ("GMO") filed with the Commission fifty eight (58) rates tariff sheets and six (6) rules and regulations tariff sheets each bearing an issue date of May 12, 2011, and a proposed effective date of June 11, 2011, which the Commission assigned Tracking No. YE-2011-0567, and which GMO asserted complied with the Commission's May 4, 2011 Report and Order. With these tariff sheets GMO filed a motion (Motion For Expedited Consideration And Approval Of Tariff Sheets Filed In Compliance With Commission Order On Less Than Thirty Days' Notice) seeking for the tariff sheets to become effective June 4, 2011.

Staff reviewed the tariff sheets on Friday, May 13th and found that certain tariff sheets pertaining to GMO's Fuel Adjustment Clause did not comply with the Commission's Report and Order. Late in the afternoon of May 13th Staff informed GMO that GMO needed to withdraw the non-compliant Fuel Adjustment Clause tariff sheets and file compliant ones, if it wanted Staff to recommend the Commission approve Fuel Adjustment Clause tariff sheets. On May 16th Staff and GMO continued to discuss what GMO needed to do to develop compliant tariff sheets.

On May 16, 2011, at 5:04PM, without withdrawing the Fuel Adjustment Clause tariff Sheet Nos. 127.6 through 127.10 it filed on May 12, 2011, GMO filed new Fuel Adjustment Clause Electric, tariff Sheet Nos. 127.6 through 127.10 each bearing issue dates of May 16, 2011 and proposed effective dates of June 15, 2011, which the Commission assigned Tracking No. YE-2011-0577. With these tariff sheets GMO filed a second motion (Motion For Expedited Consideration And Approval Of Tariff Sheets Filed In Compliance With Commission Order On Less Than Thirty Days' Notice) seeking for these tariff sheets to become effective June 4, 2011.

On May 17, 2011, GMO filed five (5) substitute tariff sheets to correct typographical errors as requested by the Staff, and GMO withdrew the Fuel Adjustment Clause tariff Sheet Nos. 127.6 through 127.10 it filed on May 12, 2011, which were included in Tracking No. YE-2011-0567.

These tariff sheets are designed to comply with Ordered Paragraphs 1 and 3 of the Commission's May 4, 2011 Report And Order (Order). Ordered Paragraphs 1, 3 and 4 of the Order state:

1. The seven Nonunanimous Stipulations and Agreements referenced in this Report and Order are approved, and the signatories thereto are ordered to comply with those Nonunanimous Stipulations and Agreements.
3. KCP&L Greater Missouri Operations Company shall file tariffs that comport with this Report and Order no later than May 12, 2011.
4. The Staff of the Commission shall file a recommendation regarding the tariffs ordered in paragraph 3 no later than May 16, 2011. Any party that wishes to object to the tariffs ordered in paragraph 3 shall do so no later than May 16, 2011.

Revenue Requirement and Rate Design

The revenue requirement increase for Total GMO is \$59,436,131 or 9.30% (L&P of \$29,293,182 or 20.99% and MPS of \$30,142,949 or 6.03%). Rate Design tariff sheets filed by GMO comply with approved: 1) Non-unanimous Stipulation and Agreement as to Class Cost of Service / Rate Design, 2) Non-unanimous Stipulation and Agreement as to MGE Rate Design Issue and 3) Non-unanimous Stipulation and Agreement as to Outdoor Lighting Issues.

Low-Income Weatherization

The Commission determined that GMO shall continue its low-income weatherization program at its present level of funding; continue working with local community action agencies; and evaluate transition of the funds to the Environmental Improvement and Energy Resources Authority (EI ERA) and administration of the program to the Department of Natural Resources (DNR) and present that evaluation to the Greater Missouri Operations Advisory Group (GMOAG) for consideration.

Fuel Adjustment Clause

In its May 4, 2011 Report and Order in a section headed **Decision – FAC Other Issues** that starts on page 219 of the Report and Order, the Commission stated:

The Commission did not find in favor of Staff's prudence disallowance and imputed costs for two additional turbines at South Harper. Therefore, the Commission will not add the Crossroads Generating Station Factor in the FAC.

GMO's FAC shall be modified so that the factor RNSI (forecasted retail net system input) is redefined to clarify that it is based on net system input *at the generator* as set out in Exhibit GMO 211, Staff Rate Design and Class Cost-of-Service Report, at page 33, Schedule JAR-2-16.

GMO's FAC shall be modified to clarify that only sales to Missouri municipalities are excluded from off-system sales revenues (GMO FAC factor "OSSR") as set out in Exhibit GMO 241, Surrebuttal Testimony of John Rogers, Schedule JAR-2-15 Revised.

GMO's FAC tariff sheets shall be modified to clarify and improve them as shown

in the example tariff sheets attached to Staff's Rate Design and Class Cost-of-Service Report, as revised in schedules attached to the Surrebuttal Testimony of John A. Rogers to the extent that Staff's proposed changes match changes proposed by GMO in the Direct Testimony of Tim M. Rush.

The Commission determines that transmission costs for OSS are appropriately included in the FAC under the Commission's rule 4 CSR 240-20.090(1)(B). All other transmission costs are not appropriate and shall not be included. In addition, because the Commission has determined that transmission costs from the Crossroads facility shall not be borne by the ratepayers, those costs shall also be excluded from the FAC mechanism.

Staff Recommendation

The Staff has reviewed the tariff sheets filed on May 12, 2011, after substitution and withdrawal of tariff Sheets Nos. 127.6, 127.7, 127.8, 127.9 and 127.10 on May 17, 2011, as well as the tariff Sheets Nos. 127.6, 127.7, 127.8, 127.9 and 127.10 filed on May 16, 2011, and is of the opinion that they are in compliance with the Commission's Report and Order. Staff therefore recommends that the Commission issue an Order approving the following proposed tariff sheets, as filed on May 12, 2011, and substituted on May 17, 2011, to become effective on June 4, 2011 as requested in GMO's Motion with less than 30 day's notice for good cause shown pursuant to Section 393.140(11) RSMo 2000 and agreed to by the signatory parties in the Non-Unanimous Stipulations and Agreements:

P.S.C. MO. No. 1 (Table of Contents)

7 th	Revised Sheet No. 2	Canceling	6 th	Revised Sheet No. 2
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P.S.C. MO. No. 1 (Rates – MPS)

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5 th	Revised Sheet No. 92	Canceling 4 th	Revised Sheet No. 92
3 rd	Revised Sheet No. 93	Canceling 2 nd	Revised Sheet No. 93
5 th	Revised Sheet No. 95	Canceling 4 th	Revised Sheet No. 95

P.S.C. MO. No. 1 (Rates – L&P and MPS)

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1 st	Revised Sheet No. 127.1	Canceling	Original Sheet No. 127.1
1 st	Revised Sheet No. 127.2	Canceling	Original Sheet No. 127.2
1 st	Revised Sheet No. 127.3	Canceling	Original Sheet No. 127.3
1 st	Revised Sheet No. 127.4	Canceling	Original Sheet No. 127.4
4 th	Revised Sheet No. 127.5	Canceling 3 rd	Revised Sheet No. 127.5
	Original Sheet No. 133		

P.S.C. MO. No. 1 (Rules – L&P and MPS)

1 st	Revised Sheet No. R-1	Canceling	Original Sheet No. R-1
	Original Sheet No. R-5A		
1 st	Revised Sheet No. R-20	Canceling	Original Sheet No. R-20
1 st	Revised Sheet No. R-27	Canceling	Original Sheet No. R-27
1 st	Revised Sheet No. R-34	Canceling	Original Sheet No. R-34
2 nd	Revised Sheet No. R-66	Canceling 1 st	Revised Sheet No. R-66

Staff therefore recommends that the Commission, in the same Order with which it approves the foregoing proposed tariff sheets, also approve the following proposed new tariff sheets, as filed

on May 16, 2011, to become effective on June 4, 2011 as requested by GMO in its second motion, with less than 30 days' notice:

P.S.C. MO. No. 1, filed effective June 15, 2011

Original Sheet No. 127.6

Original Sheet No. 127.7

Original Sheet No. 127.8

Original Sheet No. 127.9

Original Sheet No. 127.10

Staff has verified that GMO has filed its 2010 annual report and is not delinquent on its assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.


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

In the Matter of the Application of)	
KCP&L Greater Missouri Operations)	Case No. ER-2010-0356
Company for Approval to Make Certain)	File Nos. YE-2011-0567 and
Changes in its Charges for Electric)	YE-2011-0577
Service)	

AFFIDAVIT OF WILLIAM L. MCDUFFEY

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

William L. McDuffey, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was given by him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



William L. McDuffey

Subscribed and sworn to before me this 17th day of May 2011.

SUSAN L. SUNDERMEYER Notary Public - Notary Seal State of Missouri Commissioned for Callaway County My Commission Expires: October 03, 2014 Commission Number: 10942086
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Notary Public

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

In the Matter of the Application of)
KCP&L Greater Missouri Operations)
Company for Approval to Make Certain)
Changes in its Charges for Electric)
Service)

Case No. ER-2010-0356
File Nos. YE-2011-0567 and
YE-2011-0577

AFFIDAVIT OF JOHN A. ROGERS

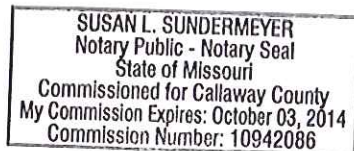
STATE OF MISSOURI)
) ss
COUNTY OF COLE)


John A. Rogers, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was given by him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



John A. Rogers

Subscribed and sworn to before me this 17th day of May 2011.





Notary Public

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

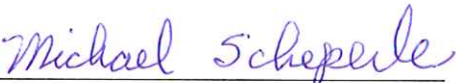
In the Matter of the Application of)
KCP&L Greater Missouri Operations)
Company for Approval to Make Certain)
Changes in its Charges for Electric)
Service)

Case No. ER-2010-0356
File Nos. YE-2011-0567 and
YE-2011-0577

AFFIDAVIT OF MICHAEL S. SCHEPERLE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)


Michael S. Scheperle, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was given by him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Michael S. Scheperle

Subscribed and sworn to before me this 17th day of May 2011.





Notary Public

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

In the Matter of the Application of)
KCP&L Greater Missouri Operations)
Company for Approval to Make Certain)
Changes in its Charges for Electric)
Service)

Case No. ER-2010-0356
File Nos. YE-2011-0567 and
YE-2011-0577

AFFIDAVIT OF CURT WELLS

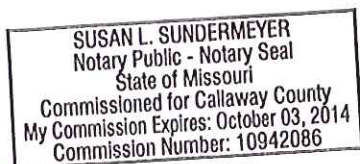
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Curt Wells, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was given by him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Curt Wells

Subscribed and sworn to before me this 17th day of May 2011.



Notary Public