

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

In the Matter of KCP&L Great Missouri Operations            )  
Company’s Submission of its 2013 Renewable                )  
Energy Standard Compliance Report                            )        Case No. EO-2014-0290

In the Matter of KCP&L Greater Missouri Operations        )  
Company’s Submission of its 2014 Renewable                )  
Energy Standard Compliance Plan                                )        Case No. EO-2014-0288

**COMMENTS OF KARL R. RÁBAGO  
ON BEHALF OF MOSEIA**

COMES NOW the Missouri Solar Energy Industries Association (MOSEIA), pursuant to 4 CSR 240-2.080, and offers these Comments from its expert Karl R. Rábago concerning KCP&L Greater Missouri Operations Company’s (KCP&L-GMO’s) 2013 Renewable Energy Standard Compliance Report and 2014-2016 Renewable Energy Standard Compliance Plan. Mr. Rábago is the principal of Rábago Energy, LLC. Mr. Rábago has 24 years experience in electric utility regulation and policy, having served as a public utility commissioner in Texas, a federal energy executive, and a utility executive. After reviewing the confidential workpapers distributed by the Company in this case, Mr. Rábago offers the following observations on behalf of MOSEIA:

1. KCP&L-GMO does not appear to have attempted to perform the one percent retail rate impact calculation appearing in section (5) of the Commission’s rule at 4 CSR 240-20.100. Instead, the Company apparently has chosen to simply use 1% of its expected revenue requirement for the years 2014-2023. This may be a result of the confusion surrounding the proper way to perform the section (5) calculation, perhaps intended as a mere placeholder until the Commission provides guidance through its ongoing rulemaking to implement the provisions

of House Bill 142 (HB142)(2013). Assuming the section (5) calculation were performed according to the rule, the RES budget over the 2014-2021 term could be significantly larger.

2. However, even accepting KCP&L-GMO's simplified "1% of future revenue requirement" calculation, the Company appears to have ample funds available under the 1% limit each year from 2014-2021.

3. KCP&L-GMO plans to collect \*\*\*\*\* billion from customers as non-RES revenue requirement during the term 2014-2021; 1% of the \*\*\*\*\* billion amount is \*\*\*\*\* million. This is the "budget" for RES compliance over the 8 year report term, using KCP&L-GMO's simplified 1% calculation.

4. KCP&L-GMO is currently committed to spend \*\*\*\*\* million on RES compliance during the report term.

5. KCP&L-GMO's uncommitted RES budget over the report term is \*\*\*\*\* million. KCP&L-GMO's uncommitted annual RES budget is an average of \*\*\*\*\* million per year of the report term.

6. This analysis does not include future and unapproved resources.

WHEREFORE, MOSEIA respectfully files these Comments of its expert Karl R. Rábago concerning KCP&L-GMO's 2013 Renewable Energy Standard Compliance Report and 2014-2016 Renewable Energy Standard Compliance Plan.

Respectfully Submitted,

/s/ Wendy Shoemyer  
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ATTORNEYS FOR MISSOURI SOLAR  
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all  
counsel of record this 29<sup>th</sup> of May, 2014.

/s/ Wendy Shoemyer  
Wendy Shoemyer