

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

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company) **File No. ER-2018-0401**
Containing Its Semi-Annual Fuel Adjustment)
Clause True-Up.)

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its recommendation respectfully states:

1. On June 29, 2018, KCP&L Greater Missouri Operations Company (“GMO”) filed an application with the Missouri Public Service Commission (“Commission”) containing its nineteenth Fuel Adjustment Clause (“FAC”) true-up filing to identify the amounts of over- or under-recovery of the FAC for its most recently completed 12-month recovery period, Recovery Period 19,¹ as required by Commission Rules 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

2. Rule 4 CSR 240-20.090(5)(D) requires Staff to examine and analyze the information GMO has submitted and to submit a recommendation to the Commission not later than 30 days after GMO made its filing, which in this case is not later than July 30, 2018.

3. As explained in Staff’s *Memorandum*, attached hereto as Appendix A and incorporated herein by reference, Staff recommends the Commission approve GMO’s nineteenth true-up filing for Recovery Period 19, during which GMO under-recovered from its customers \$136,957 which followed its Accumulation Period 19 (June 1, 2016 through November 30, 2016).

¹ March 1, 2017 through February 28, 2018.

4. Staff reviewed and analyzed the direct testimony, supporting schedules, and workpapers of GMO witness Lisa A. Starkebaum and the monthly information GMO submitted to the Commission as required by 4 CSR 240-3.161(5).

5. Staff has verified that GMO has filed its 2017 annual report and is not delinquent on any assessment. GMO is current on its submission of its Surveillance Monitoring reports as required in 4 CSR 240-20.090(10), and its monthly reports as required by 4 CSR 240-3.161(5). With the exception of GMO's proposed changes to its current annual Fuel Adjustment Rate in its semi-annual FAC filing in File No. ER-2018-0400, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, Staff prays the Commission accept the results of its analysis and recommends that the Commission approve GMO's nineteenth true-up filing amount of \$136,957 resulting from GMO's under-recovery of \$136,957 from customers during Recovery Period 19 which will be collected from customers as a part of GMO's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2018-0400.

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin
Deputy Staff Counsel
Missouri Bar No. 51709
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 526-7779 (Telephone)
(573) 751-9285 (Fax)
bob.berlin@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 30th day of July, 2018, to all counsel of record.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2018-0401
KCP&L Greater Missouri Operations Company

FROM: Brooke Richter, Utility Regulatory Auditor IV
Lisa Wildhaber, Utility Regulatory Auditor III

DATE: /s/ John A. Rogers 07/30/2018 /s/ Robert S. Berlin 07/30/2018
Energy Resources Department / Date Staff Counsel Department / Date

SUBJECT: Staff's Analysis Of and Recommendation Concerning KCP&L Greater Missouri Operations Company's Nineteenth Fuel Adjustment Clause True-up Filing Under the Provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: July 30, 2018

Recommendation

Staff recommends the Commission approve KCP&L Greater Missouri Operations Company's ("GMO") nineteenth true-up filing for Recovery Period 19 ("RP19") during which GMO under-recovered \$136,957 from its customers.

Discussion

On June 29, 2018, GMO filed with the Commission, along with direct testimony and supporting schedules of GMO witness Lisa A. Starkebaum, its nineteenth fuel adjustment clause ("FAC") true-up filing under the provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5). According to GMO's true-up filing, in the aggregate for RP19 (March 1, 2017 through February 28, 2018), GMO under-recovered from its customers \$136,957 which followed its Accumulation Period 19 (June 1, 2016 through November 30, 2016).

The Missouri Public Service Commission Staff ("Staff") reviewed the direct testimony of GMO witness Lisa A. Starkebaum, the supporting schedules GMO provided with GMO's application in this case, and the monthly information GMO submitted to the Commission in accordance with 4 CSR 240-3.161(5).

Staff Review

Based on its review and analysis of the information GMO filed and submitted for RP19, Staff has determined that GMO's calculations for the true-up amounts for RP19, including the calculation of monthly interest, are correct.

Therefore, Staff recommends the Commission approve GMO's nineteenth true-up filing for RP19 during which GMO under-recovered \$136,957 from its customers. The under-recovered amount will be collected from customers as it will be included in GMO's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2018-0400, filed on June 29, 2018, for AP22 (December 1, 2017 through May 31, 2018).

Staff has verified that GMO has filed its 2017 Annual Report and is not delinquent on any assessment. GMO is current on its submission of its Surveillance Monitoring reports as required by 4 CSR 240-20.090(10), and its monthly reports as required by 4 CSR 240-3.161(5). With the exception of GMO's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2018-0401, 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

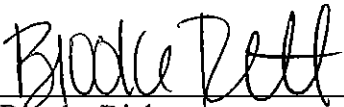
In the Matter of the Application of KCP&L)
Greater Missouri Operations Company)
Containing Its Semi-Annual Fuel Adjustment)
Clause True-Up)
File No. ER-2018-0401

AFFIDAVIT OF BROOKE RICHTER

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW, Brooke Richter and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached Staff Recommendation in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

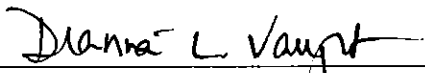
Further the Affiant sayeth not.



Brooke Richter

Subscribed and sworn to be this 26th day of July, 2018.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 28, 2019
Commission Number: 15207377



Notary Public

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In the Matter of the Application of KCP&L)
Greater Missouri Operations Company) File No. ER-2018-0401
Containing Its Semi-Annual Fuel Adjustment)
Clause True-Up)

AFFIDAVIT OF LISA WILDHABER

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

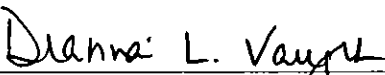
COMES NOW, Lisa Wildhaber and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached Staff Recommendation in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.



Lisa Wildhaber

Subscribed and sworn to be this 30th day of July, 2018.



Notary Public