

**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-2018-0181

STAFF RECOMMENDATION

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

1. On December 29, 2017, KCP&L Greater Missouri Operations Company ("GMO") filed an application with the Missouri Public Service Commission ("Commission") containing its eighteenth 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 18,¹ 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 January 29, 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 eighteenth true-up filing for Recovery Period 18, during which GMO over-recovered

¹ September 1, 2016 through August 31, 2017.

from its customers \$546,583 which followed its Accumulation Period 18 (December 1, 2015 through May 31, 2016).

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 2016 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-2018-0180, 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 eighteenth true-up filing amount of (\$546,583) resulting from GMO's over-recovery of \$546,583 from customers during Recovery Period 18 which will be returned to 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-2018-0180.

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

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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 29th day of January, 2018, to all counsel of record.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2018-0181
KCP&L Greater Missouri Operations Company

FROM: Brooke Richter, Utility Regulatory Auditor IV
Catherine Lucia, Utility Regulatory Auditor IV

DATE: /s/ John A. Rogers 01/29/2018 /s/ Robert S. Berlin 01/29/2018
Energy Resources Department / Date Staff Counsel Department / Date

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

DATE: January 29, 2018

Recommendation

Staff recommends the Commission approve KCP&L Greater Missouri Operations Company's ("GMO") eighteenth true-up filing for Recovery Period 18 ("RP18") during which GMO over-recovered \$546,583 from its customers.

Discussion

On December 29, 2017, GMO filed with the Commission, along with direct testimony and supporting schedules of GMO witness Lisa A. Starkebaum, its eighteenth 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 RP18 (September 1, 2016 through August 31, 2017), GMO over-recovered from its customers \$546,583 which followed its Accumulation Period 18 (December 1, 2015 through May 31, 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 RP18, Staff has determined that GMO's calculations for the true-up amounts for RP18, including the calculation of monthly interest, are correct.

Therefore, Staff recommends the Commission approve GMO's eighteenth true-up filing for RP18 during which GMO over-recovered \$546,583 from its customers. The over-recovered amount will be returned to 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-2018-0180, filed on December 29, 2017, for AP21 (June 1, 2017 through November 30, 2017).

Staff has verified that GMO has filed its 2016 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-2018-0181, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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In the Matter of the Application of KCP&L)
Greater Missouri Operations Company) File No. ER-2018-0181
Containing Its Semi-Annual Fuel Adjustment)
Clause True-Up)

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 foregoing Staff Recommendation in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

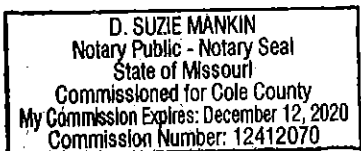
Further the Affiant sayeth not.

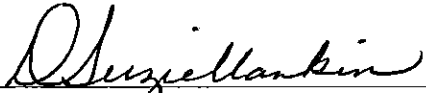


BROOKE RICHTER

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 29th day of January 2018.





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) File No. ER-2018-0181
Containing Its Semi-Annual Fuel Adjustment)
Clause True-Up)

AFFIDAVIT OF CATHERINE LUCIA

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

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

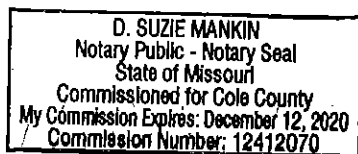
Further the Affiant sayeth not.

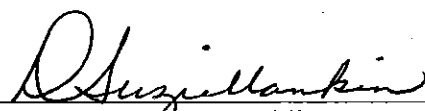


CATHERINE LUCIA

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 29th day of January 2018.





Notary Public