

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

In the Matter of KCP&L Greater Missouri)	
Operations Company Request for Authority)	<u>File No. ER-2019-0198</u>
to Implement Rate Adjustments Required by)	Tracking No. JE-2019-0136
4 CSR 240-20.090(4) and the Company's)	
Approved Fuel and Purchased Power Cost)	
Recovery Mechanism)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and submits its Recommendation as follows:

1. On December 31, 2018, KCP&L Greater Missouri Operations Company ("GMO" or "Company") submitted direct testimony and a tariff designed to implement an adjustment to its Fuel and Purchased Power Adjustment Clause ("FAC"). The submitted tariff bears an effective date of March 1, 2019.

2. Concurrently on December 31, 2018, GMO submitted a true-up filing in File No. ER-2019-0199 to identify the net fuel costs it over- or under-charged customers during the 20th Recovery Period prescribed by its FAC. This amount is used when calculating the new FARs in this case.

3. On January 2, 2019, the Commission ordered Staff to examine and analyze GMO's filings in this case, and to file its recommendation no later than January 30, 2019, as required by Rule 4 CSR 240-20.090(4). The Commission also directed that notice of the order be served on parties to File No. ER-2018-0146 (the file in which GMO's FAC was most recently re-approved).

4. Any party wishing to intervene was given a deadline of January 21, 2019 to file an application with the Commission.

5. No parties have filed to intervene in this matter.

6. On January 30, 2019, Staff filed a Motion for Extension of Time, in order to better review and discuss the Substitute Tariff filed by GMO on January 30, 2019. The Commission granted the order on January 31, 2019, and ordered Staff to file a recommendation no later than February 8, 2019.

7. Staff's Memorandum, attached hereto as Appendix A and incorporated by reference, recommends the Commission issue an order indicating the proposed revised tariff sheet GMO filed on February 7, 2019, become effective on March 1, 2019, by operation of law. Further, Staff's recommendation comes with the acknowledgment that GMO's FAC allows for retrospective adjustments in subsequent FAR filings, at which time there is expected to be a more comprehensive understanding of the methodology and framework of 393.1655, RSMo., and its impact on adjustments for GMO in the future.

8. Commission Rule 4 CSR 240-20.090(4) states: "An electric utility with a FAC shall file one (1) mandatory adjustment to its FAC in each true-up year coinciding with the true-up of its FAC." The rule requires Staff to "determine if the proposed adjustment to the FAC is in accordance with the provisions of this rule, section 386.266 RSMo and the FAC mechanism established in the most recent general rate proceeding." If so, "the commission shall either issue an interim rate adjustment order approving the tariff schedules and the FAC rate adjustments within sixty (60) days of the electric utility's filing or...the tariff schedules and the FAC rate adjustments shall take effect sixty (60) days after the tariff schedules were filed."

9. GMO's filing in this case requests Commission approval of one tariff sheet bearing an effective date of March 1, 2019, that revises the current Fuel Adjustment Rates

("FARs") in its FAC. The filing includes testimony and workpapers of GMO witness Lisa A. Starkebaum supporting the Company's calculation of the Fuel and Purchased Power Adjustment ("FPA").

10. The FPA amount is \$29,840,688. This represents the total requested increase in the amount sought to be collected in customer FAC charges over the applicable recovery period. The FPA amount includes the difference between Annual Net Energy Costs ("ANEC") and Net Base Energy Cost ("B") the Company experienced during the 23rd Accumulation Period, plus application of the Commission approved 95 percent sharing ratio, plus the amount from the true-up for the 20th Recovery Period in File No. ER-2019-0199, and applicable interest.

11. As explained in Staff's Memorandum, this is the first filing where Section 393.1655 provisions have been applied to this, or any other, rate adjustment, as a result of the election of 393.1400.5 – Plant in Service Accounting ("PISA") by a utility.

12. Due to Section 393.1655, RSMo, Large Power Service class customers are limited to a 2% compound annual growth rate limitation. As a result of Section 393.1655, RSMo., GMO's FAR filing proposed implementation of separate rates for Large Power Service customers and Non-Large Power Service customers.

13. GMO's proposed bifurcation of the FAC in this FAR filing represents one way – but not the only way – to perform such implementation. Again, Staff's recommendation comes with the understanding that GMO's FAC allows for retrospective adjustments in subsequent FAR filings as more data regarding the growth rate limitations and methodologies under 393.1655 RSMo. is collected and more experience with the statute refines the approaches taken

14. 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 periodic reports as required by 4 CSR 240-3.161(5). With the exception of the true-up filing in File No. ER-2019-0198, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, Staff recommends the Commission issue an order indicating the 4th Revised Sheet No. 127.12 of the Fuel Adjustment Clause of KCP&L Greater Missouri Operations Company, as substituted on February 7, 2019, become effective on March 1, 2019 by operation of law.

Respectfully Submitted,

/s/ Travis J. Pringle

Travis J. Pringle
Missouri Bar No. 71128
Legal Counsel for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo 65102-0360
(573) 751-4140 (Telephone)
(573) 751-9285 (Facsimile)
(Email) travis.pringle@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all counsel of record this 8th day of February, 2019.

/s/ Travis J. Pringle

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2019-0198, Tariff Tracking No. JE-2019-0136
KCP&L Greater Missouri Operations Company

FROM: Brooke Mastrogiannis, Utility Regulatory Auditor IV
Lisa Wildhaber, Utility Regulatory Auditor III
Cyndi Tandy, Utility Regulatory Auditor I
Curt Gateley, Utility Policy Analyst II

DATE: /s/ Natelle Dietrich 2/8/2019 /s/ Travis Pringle 2/8/2019
Commission Staff Division / Date Staff Counsel Department / Date

SUBJECT: Staff Recommendation for Approval of Tariff Sheet Filed to Change Rates
Related to KCP&L Greater Missouri Operations Company's Fuel
Adjustment Clause Pursuant to the Commission's Report and Order in
Case No. ER-2016-0156

DATE: February 8, 2019

Staff Recommendation

Missouri Public Service Commission Staff ("Staff"), as more fully explained below, recommends the Commission issue an order indicating proposed 4th Revised Sheet No. 127.12 of the Fuel Adjustment Clause ("FAC") of KCP&L Greater Missouri Operations Company ("GMO" or "Company"), as substituted January 23, 2019 and February 7, 2019, will become effective on March 1, 2019, by operation of law. Staff further recommends the Commission direct GMO to maintain detailed accounting of amounts associated with implementing recently enacted legislation as it relates to the FAC, in particular to provide class-level projected kWh for future regulatory mechanism filings.

On December 31, 2018, GMO filed Notice that it elects to make the deferrals set forth in Section 393.1400.5 RSMo - Plant in Service Accounting ("PISA") effective January 1, 2019 through, at least, December 31, 2023. This is the first filing where Sections 393.1400.5 and 393.1655 provisions have been applied to this, or any other, rate adjustment. Therefore, Staff recommends the Commission allow GMO's proposed 4th Revised Sheet No. 127.12, as substituted, to become effective by operation of law date recognizing that Staff and the Company will continue to work on issues related to the implementation of the new statutory provisions. Further, Staff's recommendation comes with the acknowledgment that GMO's FAC allows for retrospective adjustments in subsequent FAR filings, at which time there is expected to be a more comprehensive

understanding of the methodology and framework of 393.1655, RSMo., and its impact on adjustments for GMO in the future.

Discussion

On December 31, 2018, GMO filed one (1) tariff sheet, 4th Revised Sheet No. 127.12 Canceling 3rd Revised Sheet No. 127.12, as substituted January 23, 2019 and February 7, 2019, bearing a proposed effective date of March 1, 2019, to revise GMO's current annual Fuel Adjustment Rates ("FARs") (lines 16 and 19 on 4th Revised Sheet No. 127.12) of its FAC. GMO filed direct testimony of its witness Lisa A. Starkebaum on December 31, 2018, and submitted to Staff work papers in support of the direct testimony and filed tariff sheet. The Commission assigned the tariff sheet to Tariff Tracking No. JE-2019-0136 and ordered Staff to file its recommendation concerning the tariff sheet no later than January 30, 2019. On January 23, 2019, GMO filed substitute tariff sheet and work papers to correct an error in the Large Power revenue amounts for the Class Average Overall Rate calculation. On January 31, 2019, the Commission granted Staff's motion for an extension of time until February 8, 2019 to file a recommendation. Following discussions with Staff, on February 7, 2019, GMO filed a substitute tariff sheet and work papers to further modify its work papers and to remove any allocation of fuel and purchased power adjustment costs from Large Power Service class to the non-Large Power Service classes, while still maintaining the 2% compound annual growth rate limitation required by Section 393.1655, RSMo.¹

Plant in Service Accounting (PISA) Deferrals Permitted Under Section 393.1400, RSMo, And Limitations On Rate Modifications Permitted Under Section 393.1655, RSMo

As stated in Lisa A. Starkebaum's testimony,

...GMO has provided notice of its election, effective January 1, 2019, to make the plant in service accounting ("PISA") deferrals permitted under section 393.1400 RSMo. As a result, the rate cap provisions of section 393.1655 RSMo., will apply to this FAC filing. The change in the FAC charge proposed in this filing does not increase the average overall rate for GMO by more than 3% and, as such, the provisions of section 393.1655.5 do not affect this FAC charge filing. However, in accordance with section 393.1655.6 RSMo., GMO has limited the increase in the FAC charge applicable to Large Power customers to 2% of the class average overall rate for that rate class, with the reduced revenues arising from limiting the large power service class average overall rate increase allocated to all other GMO classes

¹ Section 393.1655 outlines the compound annual growth rates applicable to Section 393.1400 election.

through a uniform percentage adjustment to the revenue requirement responsibility of all the other customer classes.²

As a result of section 393.1655 RSMo., GMO's FAR filing proposed separate rates for Large Power Service customers and Non-Large Power Service customers. GMO witness Lisa A. Starkebaum also provided Staff with workpapers to support the separate rates for customers, in addition to explaining the new compounded annual growth rate calculations, resulting from GMO's election of PISA, in person to Staff on January 15.

Accumulation Period 23 FARs

The testimony and work papers include information supporting GMO's calculation of the Fuel and Purchased Power Adjustment ("FPA") amount of \$29,840,688 (line 11 of 4th Revised Sheet No. 127.12) for Accumulation Period 23 ("AP23") (June 1, 2018 through November 30, 2018) reflecting the sum of:

1. The amount of \$29,215,714 on line 7 of 4th Revised Sheet No. 127.12, as substituted January 23, 2019 and February 7, 2019, which is equal to 95% of the difference between a) GMO's Missouri jurisdiction³ Actual Net Energy Costs (ANEC) (fuel costs plus net emission costs plus purchased power costs plus transmission costs less off-system sales revenue less renewable energy credit revenue) and b) GMO's Missouri jurisdiction Net Base Energy Cost;
2. The true-up amount⁴ reflected on line 8 of 4th Revised Sheet No. 127.12, as substituted January 23, 2019 and February 7, 2019, of \$162,681; and
3. The interest amount reflected on line 9 of 4th Revised Sheet No. 127.12, as substituted January 23, 2019 and February 7, 2019, of \$462,293.

The Current Period GMO FAR of \$0.00222 per kWh for Large Power Service rate class (line 13 of 4th Revised Sheet No. 127.12) is equal to GMO's Large Power Service rate class FPA amount of \$5,093,592 divided by the Estimate Recovery Period 23 ("RP23")⁵ Retail Net System

² GMO Witness Lisa A. Starkebaum's direct testimony: page 7 line 5 through line 16.

³ See line 4 of 4th Revised Sheet No. 127.12 and definition of J on 4th Revised Sheet No. 127.10.

⁴ The true-up amount was requested by GMO in its December 31, 2018 filing in File No. ER-2019-0199.

⁵ RP23 includes March 1, 2019 through February 28, 2020.

Input (“RNSI”) at the generator level⁶ (“S_{RP}”) of 2,294,410,822 kWh (line 12 of 4th Revised Sheet No. 127.12), as substituted January 23, 2019 and February 7, 2019.

The Current Period GMO FAR of \$0.00337 per kWh for Non-Large Power Service rate classes (Line 13 of 4th Revised Sheet No. 127.12) is equal to GMO’s Non-Large Power Service rate class FPA amount of \$22,108,524 divided by the Estimate Recovery Period 23 (“RP23”)³ RNSI at the generator level⁵ (“S_{RP}”) of 6,567,739,901 kWh (line 12 of 4th Revised Sheet No. 127.12), as substituted January 23, 2019 and February 7, 2019.

Because of differences in line losses of both primary and secondary voltage service levels,⁷ the tariff sheet reflects different current period FARs for service taken at primary and secondary voltages. The GMO Current Period FARs of \$0.00231 per kWh for Large Power Service and \$0.00351 per kWh for Non-Large Power Service taken at primary voltage service are included on line 14 of 4th Revised Sheet No. 127.12, as substituted January 23, 2019 and February 7, 2019. The GMO Current Period FARs of \$0.00238 per kWh for Large Power Service and \$0.00361 per kWh for Non-Large Power Service taken at secondary voltage service are included on line 17 of 4th Revised Sheet No. 127.12, as substituted January 23, 2019 and February 7, 2019.

For AP23, the Current Annual FARs are the sum of the Current Period FARs and the Prior Period FARs for GMO,⁸ and are \$0.00365 per kWh for Large Power Service and \$0.00485 per kWh for Non-Large Power Service primary voltage service; and \$0.00376 per kWh for Large Power Service and \$0.00499 per kWh for Non-Large Power Service secondary voltage service reflected on lines 16 and 19, respectively, of 4th Revised Sheet No. 127.12, as substituted January 23, 2019 and February 7, 2019.

The Accumulation Periods, Recovery Periods, and other specifications of GMO’s FAC for AP23 are set out in its tariff sheets identified in the following table:

⁶ See definition of S_{RP} on Original Sheet No. 127.11.

⁷ The voltage adjustment factors (VAFs) for GMO for both primary and secondary voltage service levels are included near the bottom of 4th Revised Sheet No. 127.12.

⁸ The Prior Period FARs for GMO on lines 15 and 18 of 4th Revised Sheet No. 127.12 are the same as those contained on lines 14 and 17 of 3rd Revised Sheet No. 127.12.

For Service Provided February 22, 2017 and Thereafter
3rd Revised Sheet No. 127.1
3rd Revised Sheet No. 127.2
3rd Revised Sheet No. 127.3
3rd Revised Sheet No. 127.4
7th Revised Sheet No. 127.5
3rd Revised Sheet No. 127.6
3rd Revised Sheet No. 127.7
3rd Revised Sheet No. 127.8
3rd Revised Sheet No. 127.9
5th Revised Sheet No. 127.10
1st Revised Sheet No. 127.11
3rd Revised Sheet No. 127.12

Listed below are GMO’s proposed Current Annual FARs on 4th Revised Sheet No. 127.12, as substituted on January 23, 2019 and February 7, 2019, and the GMO Current Annual FARs on 3rd Revised Sheet No. 127.12 together with the changes between them for primary and secondary voltage service levels.

GMO Current Annual Fuel Adjustment Rates \$ per kWh			
Service	Proposed 4th Revised Sheet No. 127.12	Now Effective 3rd Revised Sheet No. 127.12	Difference
Primary-Large Power Service	\$0.00365	\$0.00233	\$0.00132 Increase
Primary-Non-Large Power Service	\$0.00485	\$0.00233	\$0.00252 Increase
Secondary-Large Power Service	\$0.00376	\$0.00240	\$0.00136 Increase
Secondary-Non-Large Power Service	\$0.00499	\$0.00240	\$0.00259 Increase

The proposed changes to FARs will result in an increase to the typical GMO residential non-large customer's monthly bill (1,000 kWh) before taxes of \$2.59, i. e., from \$2.40 to \$4.99, which is within the 3% compound annual growth rate limitation as established in Section 393.1655 RSMo.

In her direct testimony Ms. Starkebaum states:

GMO's actual FAC includable costs that exceed the base energy costs are higher in this accumulation period than in the previous accumulation period by roughly \$19.2 million. There are a couple factors contributing to this increase. First, the ANEC in the 23rd accumulation period of June 2018 through November 2018 are higher than the ANEC in the previous 22nd accumulation period of December 2017 through May 2018 primarily due to 14% warmer than normal summer weather, especially during the months of June and September, followed by 54% colder than normal weather in October and November. Base energy costs also increased by approximately \$6 million as retail load requirements reflected in the Accumulation period NSI are naturally affected by weather. In addition, purchased power requirements increased due to weather and scheduled maintenance outages that started in March and were extended into July for both Iatan 2 and the Jeffrey Energy Center. These same units, as well as Iatan 1, had additional daily outages between August and November. These factors, as well as adjustments amounting to approximately \$1 million related to the retirement of the Sibley Generating Station during the month of November 2018, resulted in an increase to the proposed FAC charge for this 23rd accumulation period.⁹

Impact Of Section 393.1655, RSMo On This Rate Filing

Listed below are the rates currently proposed by GMO compared to Staff's calculation of the rates without the 2% compound annual growth rate limitation for Large Power Service under Section 393.1655, RSMo:

⁹ GMO witness Lisa A. Starkebaum's direct testimony; page 5 line 9 through page 6 line 12.

GMO Proposed FARs vs. FARs without 2% Compound Annual Growth Rate Limitation for Large Power Service \$ per kWh			
Service	Proposed FARs 4th Revised Sheet No. 127.12	FARs without 2% Compound Annual Growth Rate Limitation for Large Power Service	Difference
Primary-Large Power Service	\$0.00365	\$0.00485	\$0.00120 Decrease
Primary-Non-Large Power Service	\$0.00485	\$0.00485	\$0.00000 Increase
Secondary-Large Power Service	\$0.00376	\$0.00499	\$0.00123 Decrease
Secondary-Non-Large Power Service	\$0.00499	\$0.00499	\$0.00000 Increase

For this fuel adjustment rate filing, the 2% compound annual growth rate limitation resulted in \$2,638,572 of the FPA for the Large Power Service rate class being reallocated from the Large Power Service rate class. Based on discussions between the Company and Staff, for this first FAC filing impacted by Section 393.1655.6, the LP FAR has been limited to the 2% compound annual growth rate. To allow time for additional discussions on the interpretation of Section 393.1655, and the re-allocation to Non-LP FAR, \$2,638,572 has not been reallocated to non-LP classes at this time. The current period FAR for Large Power Service decreased from \$0.00337 per kWh to \$0.00222 per kWh, but the current period FAR for Non-Large Power Service remained at the previous calculation amount of \$0.00337 per kWh, since the February 7, 2019 substitute tariff sheet temporarily defers, with interest, any additional allocations to the non-Large Power Service classes to be adjusted as necessary in a future true-up filing.

Staff Review

Staff reviewed GMO's proposed 4th Revised Sheet No. 127.12 Canceling 3rd Revised Sheet No. 127.12, as substituted January 23, 2019 and February 7, 2019, the direct testimony of GMO witness Lisa A. Starkebaum and the work papers in this filing, in addition to GMO's monthly

information reports filed in compliance with 4 CSR 240-3.161(5) for AP23, and verified that the actual fuel and purchased power costs less off-system sales revenues match the fuel and purchased power costs less off-system sales revenues in GMO's proposed 4th Revised Tariff Sheet No. 127.12, as substituted January 23, 2019 and February 7, 2019. Staff reviewed GMO's monthly interest rates that are applied to 95% of the jurisdictional monthly cumulative under-/over- recovery of base fuel and purchased power costs for AP23 and verified that the monthly interest rates and calculations of monthly interest amounts are correct. Staff also reviewed GMO's additional calculations supporting the limitation of the FAC rate increase applicable to Large Power Service rate class customers, and all other customers, as a result of Section 393.1655 RSMo.

The information filed with the proposed tariff sheet, as substituted January 23, 2019 and February 7, 2019, and work papers include sufficient data to calculate GMO's FARs based on the actual fuel, purchased power, emission allowance and transmission costs net of off-system sales revenue and renewable energy credit revenue provided by GMO for AP23.

Attachment A includes three charts which provide a summary of GMO's twenty-three (23) FAC rate adjustment filings. Chart 1 illustrates a) GMO's actual net energy cost, net base energy cost and under- (over-) recovery amounts for each accumulation period, and b) that there have been nineteen (19) accumulation periods with under-recovered amounts and four (4) accumulation periods with over-recovered amounts (AP10, AP16, AP17 and AP18). Chart 2 illustrates GMO's FAC cumulative under-recovered amount at the end of each accumulation period with the cumulative under-recovered amount through AP23 of approximately \$295 million. Chart 3 illustrates GMO's FAC cumulative under-recovered percentage at the end of each accumulation period with the cumulative under-recovered percentage through AP23 of approximately 12%.

Lake Road Steam Allocation of Auxiliary Power

Lisa A. Starkebaum's testimony states: "included in this accumulation period is a correction of \$217,687 plus additional interest of \$1,809 due to the reversal of the steam auxiliary credit previously included in the 22nd accumulation period Actual Net Energy Cost."¹⁰ The original entry was the result of GMO allocating a portion of the Lake Road Generating Station's auxiliary power

¹⁰ Direct Testimony of Lisa Starkebaum at page 6 line 16 and page 7 lines 1 through 3.

for the production of industrial steam delivered to GMO's steam customers. GMO originally reflected this allocation of auxiliary power as a reduction in total fuel expense charged to electric retail customers through the FAC. The entry of (\$229,812) to Account 504100 was recorded in May 2018 for the allocation of auxiliary power costs that were incurred for the period January 2018 through May 2018. GMO's reversal of the steam auxiliary credit previously included in the 22nd accumulation period's Actual Net Energy Cost is made in AP23 to comply with paragraph 10¹¹ in the Non-Unanimous Partial Stipulation and Agreement filed on September 19, 2018 in Case No. ER-2018-0146 and approved by the Commission in its October 31, 2018 *Order Approving Stipulations and Agreements*. GMO witness Lisa A. Starkebaum also provided Staff with workpapers in support of this adjustment.

Staff Recommendation

Staff is of the opinion that the tariff sheet filed on December 31, 2018, as substituted January 23, 2019 and February 7, 2019, complies with the Commission's *Report and Order* in Case No. ER-2016-0156, Commission Rule 4 CSR 240-3.161 (Electric Utility Fuel and Purchased Power Cost Recovery Mechanisms Filing and Submission Requirements), and GMO's FAC embodied in its tariff.

Commission Rule 4 CSR 240-20.090(4) provides in part:

[T]he commission shall either issue an interim rate adjustment order approving the tariff schedules and the FAC rate adjustments within sixty (60) days of the electric utility's filing or, if no such order is issued, the tariff schedules and the FAC rate adjustments shall take effect sixty (60) days after the tariff schedules were filed.

GMO requested that the 4th Revised Tariff Sheet No. 127.12 Canceling 3rd Revised Tariff Sheet No. 127.12, filed December 31, 2018 and substituted January 23, 2019 and February 7, 2019, become effective on March 1, 2019. Staff, based on its examination and analysis of the information GMO filed and submitted in this case, recommends the Commission issue an order indicating the following proposed revised tariff sheet, will take effect by operation of law on March 1, 2019:

¹¹ 10. **GMO STEAM ALLOCATIONS** GMO will use the allocation numbers used in Staff's model filed in Case No. ER-2016-0156. These allocation numbers shall be used by GMO in its FAC, QCA and surveillance reporting. GMO agrees to work with Staff, OPC and MECG to develop new steam allocation procedures prior to GMO's next electric general rate case.

P.S.C. Mo. No. 1

4th Revised Sheet No. 127.12 Canceling 3rd Revised Sheet No. 127.12

Staff has verified that GMO is not delinquent on any assessment and has filed its 2017 Annual Report. 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). Except for GMO's RP20 true-up filing in File No. ER-2019-0199 (also filed on December 31, 2018), Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing. Staff's recommendation for the Current Period FARs is solely based on the accuracy of GMO's calculations, and is not indicative of the prudence of the fuel costs during AP23.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company Request) File No. ER-2019-0198
For Authority to Implement Rate Adjustments)
Required by 4 CSR 240-20.090(4) and the)
Company's Approved Fuel and Purchased Power
Cost Recovery Mechanism

AFFIDAVIT OF BROOKE MASTROGIANNIS

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

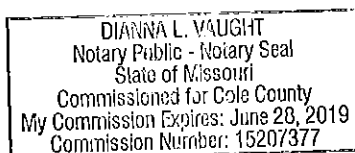
COMES NOW, Brooke Mastrogiannis, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Staff Recommendation* in Memorandum form; and that the same is true and correct according to her best knowledge and belief.


Further the Affiant sayeth not.



Brooke Mastrogiannis

Subscribed and sworn to be this 7th day of February, 2019.





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 Request) **File No. ER-2019-0198**
For Authority to Implement Rate Adjustments)
Required by 4 CSR 240-20.090(4) and the)
Company's Approved Fuel and Purchased Power
Cost Recovery Mechanism

AFFIDAVIT OF CYNTHIA M. TANDY

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

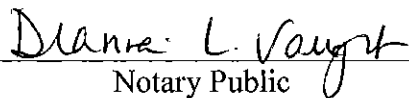
COMES NOW, Cynthia M. Tandy, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Staff Recommendation* in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.


Cynthia M. Tandy

Subscribed and sworn to be this 7th day of February, 2019.

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

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of KCP&L)
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For Authority to Implement Rate Adjustments)
Required by 4 CSR 240-20.090(4) and the)
Company's Approved Fuel and Purchased Power
Cost Recovery Mechanism

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 7th day of February, 2019.

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

