

VOLUME 8:

**FILING SCHEDULE, FILING
REQUIREMENTS, AND
STAKEHOLDER PROCESS**

**KCP&L GREATER MISSOURI
OPERATIONS COMPANY (GMO)**

INTEGRATED RESOURCE PLAN

4 CSR 240-22.080

CASE NO. EO-2012-0324

APRIL, 2012



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VOLUME 8: FILING SCHEDULE, FILING REQUIREMENTS, AND STAKEHOLDER PROCESS

This rule specifies the requirements for electric utility filings to demonstrate compliance with the provisions of this chapter. The purpose of the compliance review required by this chapter is not commission approval of the substantive findings, determinations, or analyses contained in the filing. The purpose of the compliance review required by this chapter is to determine whether the utility's resource acquisition strategy meets the requirements of Chapter 22. However, if the commission determines that the filing substantially meets these requirements, the commission may further acknowledge that the preferred resource plan or resource acquisition strategy is reasonable in whole or in part at the time of the finding. This rule also establishes a mechanism for the utility to solicit and receive stakeholder input to its resource planning process.

SECTION 1: IRP REQUIREMENTS

(1) Each electric utility which sold more than one (1) million megawatt-hours to Missouri retail electric customers for calendar year 2009 shall make a filing with the commission every three (3) years on April 1. The electric utilities shall submit their triennial compliance filings on the following schedule:

(A) Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company, or their successors, on April 1, 2012, and every third year thereafter;

GMO will file the required triennial compliance filing by April 9, 2012 per Commission Order received on March 30, 2012 for Case EO-2012-0324.

22.080 (1)

SECTION 2: TRIENNIAL COMPLIANCE REQUIREMENTS

(2) The utility's triennial compliance filings shall demonstrate compliance with the provisions of this chapter and shall include at least the following items:

(A) Letter of transmittal expressing commitment to the approved preferred resource plan and resource acquisition strategy and signed by an officer of the utility having the authority to bind and commit the utility to the resource acquisition strategy;

A Corporate Approval Statement signed by officers of GMO has been included in Volume 7, Resource Acquisition Strategy Selection per Rule 4 CSR 240-22.070(7).

(B) If the preferred resource plan is inconsistent with the utility's business plan, an explanation of the differences and why the differences exist;

The Preferred Resource Plan is not inconsistent with GMO's business plan.

(C) Technical volume(s) that fully describe and document the utility's analysis and decisions in selecting its preferred resource plan and resource acquisition strategy.

Volume 7, "Resource Strategy Selection Strategy" is included in this filing pursuant to 4 CSR 240-22.070.

1. The technical volume(s) shall include all documentation and information specified in 4 CSR 240-22.030–4 CSR 240-22.070 and any other information considered by the utility to analyze and select its resource acquisition strategy.

2. The technical volume(s) shall be organized by chapters corresponding to 4 CSR 240-22.030–4 CSR 240-22.070.

Volumes 3 through Volumes 8 correspond to 4 CSR 240-22.030 through 4 CSR 240-22.080.

3. A separate chapter shall be designated in the technical volume(s) to address special contemporary issues pursuant to 4 CSR 240-22.080(4) and input from the stakeholder group pursuant to 4 CSR 240-22.080(5). The chapter shall identify the issues raised, how the utility addressed them, and where in the technical volume(s) the reports, analyses, and all resulting actions are presented.

Volume 8 herein, addresses the special contemporary issues pursuant to rule 4 CSR 240-22.080(4).

A Brief was filed by Dogwood Energy, LLC (Dogwood) subsequent to the Stakeholder meeting held December 19, 2011. Dogwood stated that it “remains concerned that its 650 MW combined cycle generation plant has not been given full and fair consideration in GMO’s various IRP analyses”. In Volume 6, Integrated Resource Plan and Risk Analysis, an alternative resource plan, ACCG7, was developed which included a generation addition of “existing CC”. This existing CC refers to the Dogwood combined cycle plant. It should be noted that 650 MW could not be included in the alternative resource plan, as it is public knowledge that a portion of the plant has previously been sold to other utilities. Alternative resource plan, ACCG7 includes a purchase of 310 MW of Dogwood in 2013. Details of this plan can be found in Volume 6. The capital assumptions utilized for this plan are based upon a RFP response received from Dogwood on September 15, 2011. A Midas data input template representing the Dogwood plant can be viewed in Appendix 4I of this filing. It should be noted that operating data (fixed and variable O&M, planned and unplanned outage rates, and other parameters) for Dogwood was not provided as part of Dogwood’s RFP response, therefore the equivalent operating data assumed for new combined cycle units was applied to Dogwood as well. The NPVRR of alternative resource plan can be reviewed in Volume 6, Rule 060(4)(A).

(D) The forecast of capacity balance spreadsheet completed in the specified form, included herein, for the preferred resource plan and each candidate resource plan considered by the utility.

The capacity balance spreadsheet for the preferred resource plan and each candidate resource plan has been included in Volume 6 Rule (4)(B)9.

(E) An executive summary, separately bound and suitable for distribution to the public in paper and electronic formats. The executive summary shall be an informative non-technical description of the preferred resource plan and resource acquisition strategy. This document shall summarize the contents of the technical volume(s) and shall be organized by chapters corresponding to 4 CSR 240-22.030–4 CSR 240-22.070. The executive summary shall include:

- 1. A brief introduction describing the utility, its existing facilities, existing purchase power arrangements, existing demand-side programs, existing demand-side rates, and the purpose of the resource acquisition strategy;***
- 2. For each major class and for the total of all major classes, the base load forecasts for peak demand and for energy for the planning horizon, with and without utility demand-side resources, and a listing of the economic and demographic assumptions associated with each base load forecast;***
- 3. A summary of the preferred resource plan to meet expected energy service needs for the planning horizon, clearly showing the demand-side resources and supply-side resources (both renewable and non-renewable resources), including additions and retirements for each resource type;***
- 4. Identification of critical uncertain factors affecting the preferred resource plan;***

5. For existing legal mandates and approved cost recovery mechanisms, the following performance measures of the preferred resource plan for each year of the planning horizon:

A. Estimated annual revenue requirement;

B. Estimated level of average retail rates and percentage of change from the prior year; and

C. Estimated company financial ratios;

6. If the estimated company financial ratios in subparagraph (2)(E)5.C. of this rule are below investment grade in any year of the planning horizon, a description of any changes in legal mandates and cost recovery mechanisms necessary for the utility to maintain an investment grade credit rating in each year of the planning horizon and the resulting performance measures of the preferred resource plan;

7. Actions and initiatives to implement the resource acquisition strategy prior to the next triennial compliance filing; and

8. A description of the major research projects and programs the utility will continue or commence during the implementation period; and

(F) Such other information or format as the commission may determine.

An Executive Summary has been included in this compliance filing and is entitled Volume 1 “Executive Summary”.

22.080 (2)

SECTION 3: ANNUAL UPDATE WORKSHOP

(3) Beginning in 2012, on or about April 1 of every year in which the utility is not required to submit a triennial compliance filing, each electric utility shall host an annual update workshop with the stakeholder group. The

utility at its discretion may host additional update workshops when conditions warrant. Any additional update workshops shall follow the same procedures as the annual update workshop.

(A) The purpose of the annual update workshop is to ensure that members of the stakeholder group have the opportunity to provide input and to stay informed regarding the—

- 1. Utility's current preferred resource plan;***
- 2. Status of the identified critical uncertain factors;***
- 3. Utility's progress in implementing the resource acquisition strategy;***
- 4. Analyses and conclusions regarding any special contemporary issues that may have been identified pursuant to 4 CSR 240-22.080(4);***
- 5. Resolution of any deficiencies or concerns pursuant to 4 CSR 240-22.080(16); and***
- 6. Changing conditions generally.***

GMO will host an annual workshop with the Stakeholders in the years a triennial filing is not due.

(B) The utility shall prepare an annual update report with both a public version and a highly-confidential version to document the information presented at the annual update workshop and shall file the annual update reports with the commission no less than twenty (20) days prior to the annual update workshop. The depth and detail of the annual update report shall generally be commensurate with the magnitude and significance of the changing conditions since the last filed triennial compliance filing or annual update filing. If the current resource acquisition strategy has changed from that contained in the most-recently-filed triennial compliance filing or annual update filing, the annual update report shall describe the

changes and provide updated capacity balance spreadsheets required pursuant to 4 CSR 240-22.080(2)(D). If the current resource acquisition strategy has not changed, the annual update report shall explicitly verify that the current resource acquisition strategy is the same as that contained in the most-recently filed triennial compliance filing or annual update filing.

GMO will prepare a public and highly confidential annual update report documenting the information presented at the annual update workshop.

(C) The utility shall prepare a summary report that shall list and describe any action items resulting from the workshop to be undertaken by the utility prior to next triennial compliance filing or annual update filing. The summary shall be filed within ten (10) days following the workshop. If there are no changes as a result of the workshop, the utility is required to file a notice that it will not be making any changes to its annual update report.

GMO will prepare a summary report listing and describing any action items resulting from the annual update workshop.

(D) Stakeholders may file comments with the commission concerning the utility's annual update report and summary report within thirty (30) days of the utility's filing of the summary report.

22.080 (3)

SECTION 4: SPECIAL CONTEMPORARY ISSUES

(4) It is the responsibility of each utility to keep abreast of evolving electric resource planning issues and to consider and analyze these issues in a timely manner in the triennial compliance filings and annual update reports. An order containing a list of special contemporary issues shall be issued by the commission for each utility to analyze and document in its next triennial compliance filing or next annual update report. The purpose of the special contemporary issues lists is to ensure that evolving regulatory, economic, financial, environmental, energy, technical, or customer issues are adequately addressed by each utility in its electric resource planning. Each special contemporary issues list will identify new and evolving issues but may also include other issues such as unresolved deficiencies or concerns from the preceding triennial compliance filing. To develop the list of special contemporary issues—

(A) No later than September 15, staff, public counsel, and parties to the last triennial compliance filing of each utility may file suggested special contemporary issues for each utility to consider;

(B) Not later than October 1, the utilities, staff, public counsel, and parties to the last triennial compliance filings may file comments regarding the special contemporary issues filed on September 15; and

(C) No later than November 1, an order containing a list of special contemporary issues shall be issued by the commission for each utility to analyze and document in its next triennial compliance filing or annual update report. The commission shall not be limited to only the filed suggested special contemporary issues. If the commission determines that there are no special contemporary issues for a utility to analyze, an order shall be issued by the commission stating that there are no special contemporary issues.

Order EO-2012-0042 was received by GMO with an effective date of October 29, 2011 providing a list of special contemporary issues to be analyzed and documented: The following submittal is the list of issues provided in the Order and GMO's responses:

a. Investigate and document the impacts on KCPL-GMO's preferred resource plan and contingency plans of aggressive regulations by the FERC, regional transmission organizations (RTOs) or Missouri statutes or regulations to allow aggregators of retail customers (ARCs) to operate and market demand response services in Missouri;

The company is participating in the workshops under Case Number EW-2010-0187. This process has yet to develop an analytical framework to measure the impact of aggregators of retail demand (ARCs) on the performance of the IRP alternative resource plans. In addition, Southwest Power Pool (SPP) has been granted an extension by the Federal Energy Regulatory Commission (FERC) of implementation of SPP's demand response baseline calculation, measurement, and verification processes. These measures will not be implemented until the SPP Integrated Marketplace is established in 2014. The FERC also has required SPP to make a filing in compliance with its requirements under Order 745 to implement a net benefits test for demand response deployment and to articulate another cost allocation proposal for market-related demand response costs. This compliance filing is has not yet been filed. Due to the uncertainty resulting from these ongoing proceedings and pending matters in both the state and federal regulatory arenas, the company has not been able to specifically demonstrate the impact of ARCs on Preferred Plan performance.

The company can demonstrate the impact of what may be a similar scenario to the formation of ARCs in the results of the study looking into the impact of a Federal Energy Efficiency Standard on the Preferred Plan. These results are detailed in Volume 6 Section 5 of this filing.

b. Investigate and document the impacts on KCPL-GMO's preferred resource plan and contingency plans of a new much more aggressive renewable energy standard (e.g., at least double the current standard for Missouri) with no rate cap;

Alternative Resource Plan ACCG6 complies with this section.

c. Investigate and document the impacts on KCPL-GMO's preferred resource plan and contingency plans of a very aggressive energy efficiency resource standard (e.g., annual energy savings of 1.5% each year for 20 years and annual demand savings of 1.0% each year for 20 years from electric utility demand-side programs) with no rate cap in Missouri;

Alternative Resource Plan ECCG1 complies with this section.

d. Investigate and document the impacts on KCPL-GMO's preferred resource plan and contingency plans of a loss of significant load for the short term and potentially for the long term that may be the result of a prolonged double-dip recession or a large customer or group of customers no longer taking service from KCPL-GMO.

GMO constructed a significant loss of load forecast scenario by subtracting the energy and peak demand from the largest customer for both SJLP and MPS from the results for the base case scenario. The most recent 12 billing records from each customer were used and the energy and peak from each month was used for that particular month in the forecast. Losses were added to the energy and peak demands. This scenario is described in Volume 3 in the section for rule 22.030 (8) (A).

e. Investigate and document the impacts of aggressive environmental regulations on KCPL-GMO's preferred resource plan and contingency plans.

The Preferred Plan, contingency plans, as well as all Alternative Resource Plans developed for the IRP assumed aggressive environmental regulations. These

potential regulations and assumed commencement dates are provided in Table 1 below:

Table 1: Aggressive Environmental Regulations Assumptions

Environmental Regulation	Year	Assumed Requirement
Mercury and Air Toxics Standards Rule	2015	Activated Carbon Injection
SO ₂ National Ambient Air Quality Standards	2017	Scrubber
Ozone National Ambient Air Quality Standards	2018	Selective Catalyst Reduction
PM National Ambient Air Quality Standards	2020	Baghouse
Clean Water Act Section 316(b)	2018	Fish-Friendly Screens
Clean Water Act Section 316(a) - River Units	2019	Cooling Towers
Clean Water Act Section 316(a) - Lake Units	2021	Cooling Towers
Effluent Guidelines	2017	Cease Wet Sluicing
Coal Combustion Residuals Rule	2018	Close Ash Ponds

The assumed action or equipment listed in the table above was included for each coal unit where applicable.

f. Analyze and document relationships between uncertain factors when making a determination of whether uncertain factors are entirely independent or if they should be analyzed with covariant risk analysis.

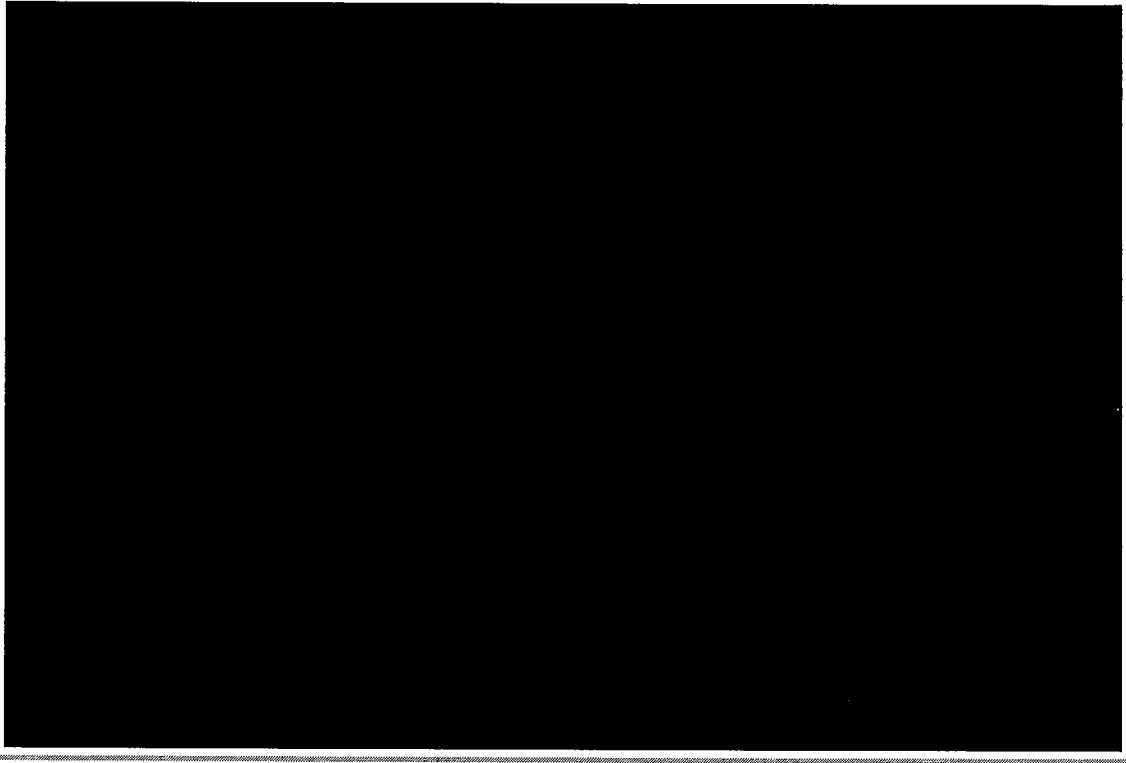
The Company has used all combinations of identified risk drivers in its analysis. This includes scenarios that exhibited both strong positive and strong negative correlations among risk drivers. By using regression methods, the Company tested the effects of all extreme risk drivers and the cases of strong positive and strong negative correlations. The results of the regression studies are conclusive. Even if strong correlations existed in the long run [either positive or negative], they have no statistically significant impact on plan performance results.

Results of the company correlation study are given in Volume 6, Section 6 of this filing.

g. Analyze, rank, and document existing coal plant fleet as retirement candidates.

Ranking of GMO's existing coal fleet with respect to retirement was generally based upon existing dispatch cost plus assumed O&M costs associated with

Figure 1: GMO Existing Coal Fleet Ranking ** Highly Confidential **



h. Analyze and document aggressive DSM portfolios without constraints. Include analysis and documentation of demand-side investment mechanisms necessary to implement each DSM portfolio.

Alternative Resource Plan DCCG1 complies with this section.

The necessary demand-side investment mechanism is described in case number EO-2012-0009 for Kansas City Power & Light's Greater Missouri Operations.

i. Analyze and document the impacts of opportunities to implement distributed generation, DSM programs, and combined heat and power projects in collaboration with municipal water treatment plants and other local waste or 6 agricultural/industrial processes with on-site electrical and thermal load requirements, especially in targeted areas where there may be transmission or distribution line constraints.

GMO has engaged Navigant Consulting to conduct a Demand-Side Management Potential study in the utility's control area. This requirement is included in the

HC

GMO has engaged Navigant Consulting to conduct a Demand-Side Management Potential study in the utility's control area. This requirement is included in the scope of work and project schedule which are contained in the "Appendix 5A Navigant_SOW_Signed_01162012.pdf". The scope of the potential study was developed by the company. The Original RFP and the proposal was reviewed by stakeholders to the IRP process during July and August of 2011 and quarterly meetings on scope and progress were held with the DSM advisory group

j. Analyze and document analysis of DSM programs targeted to achieve energy efficiency savings in the agricultural sector.

GMO has engaged Navigant Consulting to conduct a Demand-Side Management Potential study in the utility's control area. This requirement is included in the scope of work and project schedule which are contained in the "Appendix 5A Navigant_SOW_Signed_01162012.pdf". The scope of the potential study was developed by the company. The Original RFP and the proposal was reviewed by stakeholders to the IRP process during July and August of 2011 and quarterly meetings on scope and progress were held with the DSM advisory group

k. Analyze and document alternative customer information/behavior modification program options to increase customer awareness and encourage more efficient use of energy.

GMO has filed a tariff for a Residential Energy Reports Pilot Program. The behavioral modification program will provide residential customers with an energy report that provides a comparison of household energy usage information with similar type customers or neighbors. The intention of the energy report is to provide information that will influence customers' behavior in such a way that they lower their energy usage.

Additional pilot programs aimed at behavior modification are described in Appendix 5G 2011-01-5 KCPL_SmG_DOE_ProjKickOff_.ppt

l. Analyze potential or proposed changes in state or federal environmental or renewable energy standards and report how those changes would affect KCPL-GMO's plans for compliance with those standards.

Alternative Resource Plan ACCG6 complies with this section.

m. Analyze the levelized cost of energy needed to comply with the current Renewable Energy Standards law compared to the cost of energy resulting from a portfolio comprised solely of existing resources with no additional renewable resources.

The Company has analyzed the Preferred Plan with and without future RES wind and solar builds. Existing renewable assets were assumed to remain in operation. A rate comparison of these two alternatives is given below.

Table 2: Levelized Annual Rates - RES Impact

Levelized Annual Rates (\$/KWh)		
Preferred	w/o RES	Delta
\$ 0.095	\$ 0.095	\$ -
\$ 0.097	\$ 0.097	\$ -
\$ 0.103	\$ 0.103	\$ -
\$ 0.102	\$ 0.102	\$ -
\$ 0.103	\$ 0.103	\$ 0.000
\$ 0.112	\$ 0.112	\$ 0.000
\$ 0.126	\$ 0.119	\$ 0.007
\$ 0.126	\$ 0.122	\$ 0.004
\$ 0.130	\$ 0.127	\$ 0.003
\$ 0.142	\$ 0.136	\$ 0.005
\$ 0.145	\$ 0.141	\$ 0.004
\$ 0.151	\$ 0.143	\$ 0.008
\$ 0.151	\$ 0.147	\$ 0.004
\$ 0.150	\$ 0.148	\$ 0.003
\$ 0.152	\$ 0.151	\$ 0.001
\$ 0.154	\$ 0.153	\$ 0.000
\$ 0.158	\$ 0.158	\$ (0.000)
\$ 0.161	\$ 0.162	\$ (0.001)
\$ 0.163	\$ 0.165	\$ (0.002)
\$ 0.165	\$ 0.167	\$ (0.003)

n. Disclose and discuss the amount and impact of every state or federal subsidy KCPL-GMO expects to receive with regard to any or all fuel sources it intends to use during the IRP study period.

GMO does not expect to receive any state or federal subsidies for fuel resources.

22.080 (4)

SECTION 5: STAKEHOLDER GROUP MEETINGS

(5) Each electric utility shall convene a stakeholder group to provide the opportunity for public input into electric utility resource planning in a timely manner that may affect the outcome of the utility resource planning efforts. The utility may choose to not incorporate some, or all, of the stakeholder group input in its analysis and decision-making for the triennial compliance filing.

(A) The utility shall convene at least one (1) meeting of the stakeholder group prior to the triennial compliance plan filing to present a draft of the triennial compliance filing corresponding to 4 CSR 240-22.030–4 CSR 240-22.050 and to present an overview of its proposed alternative resource plans and intended procedures and analyses to meet the requirements of 4 CSR 240-22.060 and 4 CSR 240-22.070. The stakeholders shall make a good faith effort to provide comments on the information provided by the utility, to identify additional alternative resource plans, and to identify where the utility’s analyses and intended approaches may not meet the objectives of the rules.

GMO presented draft information corresponding to Rules 4 CSR 240-22.030 through 4 CSR 240-22.050 on December 19, 2011 at the Missouri Public Service Commission, 200 Madison, Room 130, Jefferson City, Missouri. The material presented at the stakeholder meeting is attached as Appendix 8A. Because all topics were able to be not presented during the allotted meeting time, a telephone conference was held on January 13, 2012 to review Transmission and Distribution topics.

(B) Within thirty (30) days of the last stakeholder group meeting pursuant to subsection (5)(A) of this rule, any stakeholder may provide the utility and other stakeholders with a written statement summarizing any potential

deficiencies in or concerns with the utility's proposed compliance with the electric resource planning rules. The utility has the opportunity to address the potential deficiencies or concerns identified by any stakeholder in its preparation of the triennial compliance filing.

(C) Any stakeholder input through the process described in section (5) of this rule does not preclude the stakeholder from filing reports in accordance with section (7) or (8) of this rule.

22.080 (5)

SECTION 6: COMMISSION DOCKETS

(6) The commission will establish dockets for the purpose of receiving the triennial compliance filings. Unless the commission specifies otherwise, the docket of the triennial compliance filing of each affected utility shall remain open to receive annual update reports including workshop summary reports, notifications of changes to the preferred plan, and other relevant documents submitted between triennial compliance filings. The commission will issue orders that establish an intervention deadline and provide for notice.

22.080 (6)

SECTION 7: TRIENNIAL COMPLIANCE FILING - STAFF REVIEW

(7) The staff shall conduct a limited review of each triennial compliance filing required by this rule and shall file a report not later than one hundred fifty (150) days after each utility's scheduled triennial compliance filing date. The report shall identify any deficiencies in the electric utility's compliance with the provisions of this chapter, any major deficiencies in the methodologies or analyses required to be performed by this chapter, and any other deficiencies and shall provide at least one (1) suggested remedy for each identified deficiency. Staff may also identify concerns with the utility's triennial compliance filing, may identify concerns related to the substantive reasonableness of the preferred resource plan or resource acquisition strategy, and shall provide at least one (1) suggested remedy for each identified concern. Staff shall provide its workpapers related to each deficiency or concern to all parties within ten (10) days of the date its report is filed. If the staff's limited review finds no deficiencies or no concerns, the staff shall state that in the report. A staff report that finds that an electric utility's filing is in compliance with this chapter shall not be construed as acceptance or agreement with the substantive findings, determinations, or analysis contained in the electric utility's filing.

22.080 (7)

SECTION 8: TRIENNIAL COMPLIANCE FILING - OTHER PARTIES REVIEW

(8) Also within one hundred fifty (150) days after an electric utility's triennial compliance filing pursuant to this rule, the public counsel and any intervenor may file a report or comments. The report or comments, based on a limited review, may identify any deficiencies in the electric utility's compliance with the provisions of this chapter, any major deficiencies in the methodologies or analyses required to be performed by this chapter, and any other deficiencies. The report may also identify concerns with the utility's triennial compliance filing and may identify concerns related to the substantive reasonableness of the preferred resource plan or resource acquisition strategy. Public counsel or intervenors shall make a good faith effort to provide at least one (1) suggested remedy for each identified deficiency or concern. Public counsel or any intervenor shall provide its workpapers, if any, related to each deficiency or concern to all parties within ten (10) days of the date its report is filed.

22.080 (8)

SECTION 9: JOINT AGREEMENT TIMELINE

(9) If the staff, public counsel, or any intervenor finds deficiencies in or concerns with a triennial compliance filing, it shall work with the electric utility and the other parties to reach, within sixty (60) days of the date that the report or comments were submitted, a joint agreement on a plan to remedy the identified deficiencies and concerns. If full agreement cannot be reached, this should be reported to the commission through a joint filing as soon as possible but no later than sixty (60) days after the date on which the report or comments were submitted. The joint filing should set out in a brief narrative description those areas on which agreement cannot

be reached. The resolution of any deficiencies and concerns shall also be noted in the joint filing.

22.080 (9)

SECTION 10: ESTABLISHMENT OF HEARING

(10) If full agreement on remedying deficiencies or concerns is not reached, then, within sixty (60) days from the date on which the staff, public counsel, or any intervenor submitted a report or comments relating to the electric utility's triennial compliance filing, the electric utility may file a response and the staff, public counsel, and any intervenor may file comments in response to each other. The commission will issue an order which indicates on what items, if any, a hearing will be held and which establishes a procedural schedule.

22.080 (10)

SECTION 11: SUBMISSION OF DOCUMENTATION

(11) All workpapers, documents, reports, data, computer model documentation, analysis, letters, memoranda, notes, test results, studies, recordings, transcriptions, and any other supporting information relating to the filed resource acquisition strategy within the electric utility's or its contractors' possession, custody, or control shall be preserved and submitted within two (2) days of its triennial compliance or annual update filings in accordance with any protective order to the staff and public counsel, and to any intervenor within two (2) days of the intervenor signing and filing a confidentiality agreement, for use in its review of the periodic filings required by this rule. All information shall be labeled to reference the sections of the technical volume(s) to which it is related, and all spreadsheets shall have all formulas intact. Each electric utility shall retain at least one (1) readable copy of the officially adopted resource acquisition

strategy and all supporting information for at least the prior three (3) triennial compliance filings.

GMO will submit workpapers, documents, reports, data, computer model documentation, analysis, letters, memoranda, notes, test results, studies, recordings, transcriptions, and any other supporting information within two days of submitting the triennial filing.

22.080 (11)

SECTION 12: NOTICE OF CHANGE TO PREFERRED PLAN

(12) If, between triennial compliance filings, the utility's business plan or acquisition strategy becomes materially inconsistent with the preferred resource plan, or if the utility determines that the preferred resource plan or acquisition strategy is no longer appropriate, either due to the limits identified pursuant to 4 CSR 240-22.070(2) being exceeded or for other reasons, the utility, in writing, shall notify the commission within sixty (60) days of the utility's determination and shall serve notice on all parties to the most recent triennial compliance filing. The notification shall include a description of all changes to the preferred plan and acquisition strategy, the impact of each change on the present value of revenue requirement, and all other performance measures specified in the last filing pursuant to 4 CSR 240-22.080 and the rationale for each change.

(A) If the utility decides to implement any of the contingency resource plans identified pursuant to 4 CSR 240-22.070(4), the utility shall file for review a revised resource acquisition strategy. In this filing, the utility shall specify the ranges or combinations of outcomes for the critical uncertain factors that define the limits within which the new alternative resource plan remains appropriate.

(B) If the utility decides to implement a resource plan not identified pursuant to 4 CSR 240-22.070(4) or changes its acquisition strategy, it shall

give a detailed description of the revised resource plan or acquisition strategy and why none of the contingency resource plans identified in 4 CSR 240-22.070(4) were chosen. In this filing, the utility shall specify the ranges or combinations of outcomes for the critical uncertain factors that define the limits within which the new alternative resource plan remains appropriate.

22.080 (12)

SECTION 13: GRANTING OF WAIVER OR VARIANCE

(13) Upon written application made at least twelve (12) months prior to a triennial compliance filing, and after notice and an opportunity for hearing, the commission may waive or grant a variance from a provision of 4 CSR240-22.030–4 CSR 240-22.080 for good cause shown. The commission may grant an application for waiver or variance filed less than twelve (12) months prior to the triennial compliance filing upon a showing of good cause for the delay in filing the application for waiver or variance.

KCP&L did not request any requests for waivers for the triennial filing.

(A) The granting of a variance to one (1) electric utility which waives or otherwise affects the required compliance with a provision of this chapter does not constitute a waiver respecting, or otherwise affect, the required compliance of any other electric utility with a provision of these rules.

(B) The commission will not waive or grant a variance from this chapter in total.

22.080 (13)

SECTION 14: WAIVER FOR ANNUAL UPDATE WORKSHOP

(14) An electric utility which sells less than seven (7) million megawatt-hours to Missouri retail electric customers for the previous calendar year

may apply for a waiver allowing it to conduct an annual update workshop pursuant to section (3) of this rule in place of its scheduled triennial compliance filing pursuant to section (1) of this rule, if the utility has no unresolved deficiencies or concerns from its prior triennial plan filing or annual update filing that materially affect its resource acquisition strategy. Upon written application made at least twelve (12) months prior to a triennial compliance filing, and after notice and an opportunity for hearing, the commission may allow the utility to conduct the annual update workshop process in lieu of submitting its triennial compliance filing. No more than one (1) such waiver may be granted consecutively between triennial compliance filings.

22.080 (14)

SECTION 15: EXTENDING OR REDCUING TIME PERIODS

(15) The commission may extend or reduce any of the time periods specified in this rule for good cause shown.

22.080 (15)

SECTION 16: COMMISSION ISSUED ORDER

(16) The commission will issue an order which contains its findings regarding at least one (1) of the following options:

(A) That the electric utility's filing pursuant to this rule either does or does not demonstrate compliance with the requirements of this chapter, and that the utility's resource acquisition strategy either does or does not meet the requirements stated in 4CSR 240-22.

(B) That the commission approves or disapproves the joint filing on the remedies to the plan deficiencies or concerns developed pursuant to section (9) of this rule;

(C) That the commission understands that full agreement on remedying deficiencies or concerns is not reached and pursuant to section (10) of this rule, the commission will issue an order which indicates on what items, if any, a hearing(s) will be held and which establishes a procedural schedule; and

(D) That the commission establishes a procedural schedule for filings and a hearing(s), if necessary, to remedy deficiencies or concerns as specified by the commission.

22.080 (16)

SECTION 17: COMMISSION ACKNOWLEDGEMENT OF PREFERRED RESOURCE PLAN

(17) If the commission finds that the filing achieves substantial compliance with the requirements outlined in section (16), the commission may acknowledge the utility's preferred resource plan or resource acquisition strategy as reasonable at a specific date. The commission may acknowledge the preferred resource plan or resource acquisition strategy in whole, in part, with exceptions, or not at all. Acknowledgment shall not be construed to mean or constitute a finding as to the prudence, pre-approval, or prior commission authorization of any specific project or group of projects. In proceedings where the reasonableness of resource acquisitions are considered, consistency with an acknowledged preferred resource plan or resource acquisition strategy may be used as supporting evidence but shall not be considered any more or less relevant than any other piece of evidence in the case. Consistency with an acknowledged preferred resource plan or resource acquisition strategy does not create a

rebuttable presumption of prudence and shall not be considered to be dispositive of the issue. Furthermore, in such proceedings, the utility bears the burden of proof that past or proposed actions are consistent with an acknowledged preferred resource plan or resource acquisition strategy and must explain and justify why it took any actions inconsistent with an acknowledged preferred resource plan or resource acquisition strategy.

(A) The utility shall notify the commission pursuant to 4 CSR 240-22.080(12) in the event there is material reason why any plan acknowledged by the commission is no longer viable.

(B) Any interested stakeholder group may file a notice in the utility's most recent Chapter 22 compliance file with the commission if a substantial change in circumstances has occurred that it believes may result in the invalidation of any aspect of a preferred resource plan or portion of a resource acquisition strategy previously acknowledged by the commission.

(C) The utility about which a stakeholder group files a notice described in the previous section may file its response within fifteen (15) working days of the date the notice is filed.

GMO requests Commission acknowledgement that it is reasonable for GMO and KCP&L to perform resource planning on a joint company basis as evidenced by the significant savings to retail customers from such planning. The results of resource analysis assuming a combined-company basis is that GMO benefitted by +\$140 Million on a 20-year NPVRR basis in savings in comparison to the plan that would be selected for GMO on a stand-alone basis. This savings is due to GMO being able to delay building new capacity by seven years and the opportunity to share with KCP&L a smaller portion of a new combined cycle facility that would be built in 2021 under a combined-company scenario.

GMO also requests that the Commission find that GMO's Preferred Resource Plan is reasonable as of its filing.

22.080 (17)

SECTION 18: CERTIFICATION OF CONSISTANCY OF PREFERRED PLAN TO FUTURE CASE

(18) In all future cases before the commission which involve a requested action that is affected by electric utility resources, preferred resource plan, or resource acquisition strategy, the utility must certify that the requested action is substantially consistent with the preferred resource plan specified in the most recent triennial compliance filing or annual update report. If the requested action is not substantially consistent with the preferred resource plan, the utility shall provide a detailed explanation.

22.080 (18)