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

| In the Matter of An Application for a     | ) |         |
|-------------------------------------------|---|---------|
| Variance from CSR 240-20.093(9) Regarding | ) | Case No |
| A DSIM Surveillance Monitoring Report     | ) |         |

## APPLICATION FOR A VARIANCE CONCERNING THE DSIM ANNUAL SURVEILANCE MONITORING REPORT REQUIREMENT OF KCP&L GREATER MISSOURI OPERATIONS COMPANY

Pursuant to 4 C.S.R. 240-2.060, 4 C.S.R. 240-2.015 and 4 C.S.R. 240-20.093(13), KCP&L Greater Missouri Operations Company ("GMO" or "Company") hereby respectfully submits to the Missouri Public Service Commission ("Commission") an application ("Application") for variance concerning the annual surveillance filing requirement of the Commission's Demand-Side Programs Investment Mechanism rule as set forth in 4 CSR 240-20.093 (9). Good cause exists for this variance. In support of its Application, GMO offers as follows:

- 1. GMO is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. GMO is primarily engaged in the business of generating, transmitting, distributing, and selling electric energy in portions of northwestern Missouri. GMO is an electrical corporation and public utility as defined in Mo. Rev. Stat. § 386.020 (2000). GMO provided its certificate authorizing it to do business in Missouri as a foreign corporation in Case No. EN-2009-0164. That certificate is incorporated herein by reference pursuant to 4 CSR 240-2.060(G).
- 2. GMO holds Certificates of Convenience and Necessity from the Commission to transact business as an electric public utility in certain areas of the State of Missouri and is principally engaged in the generation, transmission, distribution and sale of electric power and

energy. GMO has one pending action against it from any state or federal agency or court that

involve customer service or rates, which has occurred within three years of the date of this

Application. In addition, no annual report or assessment fees are overdue.

5. In addition to undersigned counsel, pleadings, notices, orders and other

correspondence and communications concerning this Application should be addressed to:

Tim M. Rush

Director, Regulatory Affairs

Kansas City Power & Light Company

1200 Main Street, 19<sup>th</sup> Floor

Kansas City, Missouri 64105

Phone: (816) 556-2344

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E-mail: Tim.Rush@KCPL.com

6. 4 C.S.R. 240-20.093(9) provides that each electric utility with an approved

Demand-Side Investment Mechanism ("DSIM") shall submit a surveillance monitoring report

within fifteen days of the electric utility's next scheduled United States Securities and Exchange

Commission 10-Q or 10-K filing. Section B of the rule provides that if the electric utility has an

approved fuel cost adjustment mechanism, the electric utility shall submit a single surveillance

monitoring report for all mechanisms.

7. GMO's fuel cost adjustment mechanism surveillance report is due on March 13,

2014. While the fuel cost adjustment mechanism report will be filed on that date, GMO is

requesting that the DSIM portion of the surveillance monitoring report be filed on April 7, 2014.

8. GMO hereby requests a variance until April 7, 2014 to file its DSIM surveillance

monitoring report.

<sup>1</sup> Ag Processing, Inc. a Cooperative v. KCP&L Greater Missouri Operations Company, Mo. P.S.C. File No. HC-

2012-0259.

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9. Good cause exists for the variance requested herein. This will be the first annual surveillance monitoring report for the DSIM information. GMO needs extra time to ensure that the annual information is consistent with the Demand-Side Program Annual Report which will be filed on March 31, 2014. Because the DSIM information is oriented by program, extra analysis is required to make sure the information is correct.

10. For the foregoing reasons, the Company respectfully requests that the Commission grant a variance from 4 C.S.R. 240-20.093(9) so that GMO can file its DSIM surveillance monitoring report on April 7, 2014.

Respectfully submitted,

|s| Roger W. Steiner\_

Roger W. Steiner, MBN 39586
Corporate Counsel

Korpora City Payer & Light Corporate Counsel

Kansas City Power & Light Company 1200 Main Street, 16<sup>th</sup> Floor Kansas City, MO 64105

Telephone: (816) 556-2314 Facsimile: (816) 556-2787 email: roger.steiner@kcpl.com

Counsel for KCP&L Greater Missouri Operations Company

## AFFIDAVIT

| State of Missouri | )    |
|-------------------|------|
|                   | ) ss |
| County of Jackson | )    |

I, Tim Rush, having been duly sworn upon my oath, state that I am the Director, Regulatory Affairs of Kansas City Power & Light Company ("KCP&L"), that I am duly authorized to make this affidavit on behalf of KCP&L Greater Missouri Operations Company, and that the matters and things stated in the foregoing application are true and correct to the best of my information, knowledge and belief.

Tim Rush

Subscribed and sworn before me this 10th day of March, 2014.

Notary Public

LINDA A. KIRBY
Notary Public - Notary Seal
STATE OF MISSOURI
Jackson County
My Commission Expires July 26, 2017
Commission # 13746918

## **CERTIFICATE OF SERVICE**

| I her        | eby certify that | at a copy of the | foregoing Ap    | oplication was se | erved on all | counsel of | f     |
|--------------|------------------|------------------|-----------------|-------------------|--------------|------------|-------|
| record eithe | r by electronic  | mail or by first | t class mail, p | oostage prepaid,  | on this 10th | h day of M | arch, |
| 2014.        |                  |                  |                 |                   |              |            |       |

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Roger W. Steiner