

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

In the Matter of Kansas City Power & Light Company’s     )  
Submission of its 2015 Renewable Energy Standard     )     **File No. EO-2016-0280**  
Compliance Report     )

In the Matter of Kansas City Power & Light Company’s     )  
Submission of Its 2016 Renewable Energy Standard     )     **File No. EO-2016-0282**  
Compliance Plan     )

**MISSOURI DIVISION OF ENERGY’S RESPONSE TO THE COMMENTS OF RENEW  
MISSOURI**

**COMES NOW** the Missouri Division of Energy (“DE”), by and through the undersigned counsel, and for its response to the *Comments of Renew Missouri* (“Renew MO”) on the 2016 Renewable Energy Standard Compliance Plan (“RES Plan”) of the above-captioned utility, states:

1. On April 15, 2016, Kansas City Power & Light Company (“KCP&L”) filed its RES Plan. Renew MO filed comments on the RES Plan on May 27. On June 1, the Public Service Commission (“Commission”) established time for parties to respond to comments filed by parties on the RES Plan. DE is responding to the comments of Renew MO in this filing.

2. Broadly, Renew MO raised two issues in its comments: 1) that the retail rate impact (“RRI”) calculations were not consistent with the Commission’s rules at 4 CSR 240-20.100, and 2) the RRI calculation methodologies were not consistent among the various electric utilities. DE is responding to the latter issue.

3. Renew MO states, “While Ameren and KCP&L have limited themselves to 1% of their current revenue requirement, Empire has attempted to perform the comparison spelled out in Section (5) of the Commission’s rule. Given these differing approaches, the Commission should step in to clarify what exactly is required by its rule at 4 CSR 240-20.100(5)(B).” DE

concurr with Renew MO that additional guidance from the Commission is warranted on the methodology and format to be used for calculating the 1% RRI. Additional guidance from the Commission will save utilities and stakeholders significant time and money by avoiding costly complaint processes and by standardizing procedures for future compliance years.

**WHEREFORE**, DE recommends that the Commission provide additional guidance to clarify what exactly is required by its rule at 4 CSR 240-20.100(5)(B) in terms of the methodology and format to be used for calculating the 1% RRI.

Respectfully submitted,

/s/ Alexander Antal

Alexander Antal

Associate General Counsel

Missouri Bar No. 65487

Department of Economic Development

P.O. Box 1157

Jefferson City, MO 65102

Phone: 573-522-3304

Fax: 573-526-7700

alexander.antal@ded.mo.gov

**Attorney for Missouri Division of Energy**

#### **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been emailed to the certified service list this 13<sup>th</sup> day of June, 2016.

/s/ Alexander Antal