

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

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

In the Matter of KCP&L Greater Missouri Operations)
Company’s Submission of Its 2016 Renewable Energy) **File No. EO-2016-0283**
Standard Compliance Plan)

**COMMENTS
OF UNITED FOR MISSOURI, INC.**

COMES NOW United for Missouri, Inc. (“UFM”), by and through its counsel, pursuant to Commission Rule 4 CSR 240-20.100(8)(E), and comments on the 2016 Renewable Energy Standard Compliance Plans (“Compliance Plans”) of Kansas City Power & Light Company (“KCPL”) and KCP&L Greater Missouri Operation Company (“GMO”):

1. On April 15, 2016, KCPL and GMO filed their respective Compliance Plans.
2. Commission Rule 4 CSR 240-20.100(8)(B)1.E. requires, among other things, the utility to provide, “A detailed analysis providing information necessary to verify that the RES compliance plan is the least cost, prudent methodology to achieve compliance with the RES.”
3. In answer to the above referenced requirement, KCPL and GMO provided identical answers. Each stated that each company, “believes it will not require any additional third party SRECs for the foreseeable future, based on the inclusion of SRECs transferred from qualified customer-generator’s operational solar electric systems as a condition of receiving solar rebates, along with future solar installations to be owned by” the company. See Section 2.5.1 in each Compliance Report.
4. This answer fails to respond to the rule’s required verification that the compliance plan is the least cost, prudent methodology to achieve compliance with the RES. To state that no

further SRECs will be required fails to consider whether the plan achieves compliance with the RES in the least cost, prudent manner.

5. The GMO Compliance Plan includes 5 MW of solar resources consisting of 2 MW Commercial and Industrial rooftop installations and 3 MW of a central station solar facility located at Greenwood, Missouri. The KCPL Compliance Plan includes additional SmartGrid projects and a 3 MW Commercial and Industrial rooftop installations. See Section 2.1.2 in each Compliance Plan

6. Both Compliance Plans recognize that SRECs from retail customers that have received rebates for solar facility installations will be sufficient for compliance with the requirements for the 2016 to 2018 RES Compliance Plan period. See Section 2.1.2 of each Compliance Plan. The Commission is well aware that GMO does not need additional SRECs in order to comply with the RES in the near term. In its *Report and Order* in Case No. EA-2016-0256, at page 7, the Commission explicitly found that the 3 MW Greenwood plant was not needed for GMO to comply with its current RES obligations even though the Commission granted the proposed plant a certificate of public convenience and necessity.¹

7. The Commission is also aware that solar generation is not a least cost alternative form of generation. As the Commission found in Case No. EA-2016-0256, “Witnesses for Staff and Public Counsel meticulously established that GMO’s plan to build a utility-scale solar plant is not the least-cost alternative for obtaining an additional three megawatts of energy. Wind energy and fossil fuel generation would be less costly, even when taking into account the cost to comply with environmental regulations.”² The Commission in its *Report and Order* did not just

¹ See also the KCPL Response to Eubanks Claire Interrogatories – MSC_20160421. The data request response was designated as Highly Confidential, so no further discussion will be included in these comments.

² See *Report and Order*, p. 8.

find Staff and Public Counsel contended but found that they “established” the fact that solar is not least-cost. UFM must conclude, therefore, that this finding is an established fact for the Commission.

8. If the solar plant is not needed and utility-scale solar is not the least-cost alternative for source of energy, it is hard to conceive of a rationale in which the GMO’s Greenwood Plant and KCPL’s other planned solar resources are part of a least cost, prudent plan. And the Compliance Plans certainly do not provide an adequate analysis for such a conclusion. The companies should supply one.

WHEREFORE, for the foregoing reasons, United for Missouri, respectfully requests the Commission direct KCPL and GMO to provide a reasoned analysis why the compliance plan is the least cost, prudent methodology to achieve compliance with the RES as required in its rule.

Respectfully submitted,

By: /s/ David C. Linton

David C. Linton, #32198
314 Romaine Spring View
Fenton, MO 63026
Telephone: 314-341-5769
Email: jdinton@reagan.com

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Application to Intervene was sent to all parties of record via electronic transmission this 28th day of May, 2016.

/s/ David C. Linton