

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

In the Matter of An Application for a)	<u>Case No. EE-2013-0125</u>
Variance from 4 CSR 240-20.065)	<u>Tariff Tracking No. YE-2013-0273</u>
Regarding Net Metering Tariffs)	<u>Tariff Tracking No. YE-2013-0274</u>

STAFF RECOMMENDATIONS TO APPROVE TARIFF SHEETS

COMES NOW the Staff (Staff) of the Missouri Public Service Commission (Commission), by and through counsel, and for its recommendations respectfully states:

1. Kansas City Power and Light Company (KCPL) and KCP&L Greater Missouri Operations Company (GMO) initiated this case by filing their application for a variance from the Commission's net metering Rule 4 CSR 240-20.065 until December 1, 2012, in response to Staff's filed notice (Case No. EO-2013-0124) that their tariffs no longer conformed to Rule 4 CSR 240-20.065 after it was revised effective August 30, 2012. Those revisions were primarily to make that rule consistent with Commission Rule 4 CSR 240-20.100 *Electric Utility Renewable Energy Standard Requirements*.

2. In response to Staff's recommendation on that application and the resulting Commission October 31, 2012 order directing them to revise their tariffs by December 1, 2012, to incorporate the changes required by the revised Rule 4 CSR 240-20.065, KCPL and GMO filed tariff sheets on November 30, 2012. The Commission ordered Staff to file its recommendations on them by December 18, 2012.

3. After discussions with Staff, KCPL and GMO withdrew their November 30 tariff sheets and filed new ones on December 18—Tracking Nos. YE-2013-0273 and YE-2013-0274, respectively. Each sheet bears an effective date of January 17, 2013.

The Commission ordered Staff to file its recommendations on them by no later than January 4, 2013. On January 3, 2013, to correct clerical errors, KCPL filed one substitute tariff sheet, and GMO filed two substitute tariff sheets.

4. Staff has reviewed the tariff sheets KCPL and GMO filed on December 18, 2012, as substituted on January 3, 2013, and found that they comply with Section 386.890, RSMo Supp. 2011, and the currently effective Rule 4 CSR 240-20.065. Staff's *Memorandum* recommending approval of KCPL's tariff sheets is attached hereto as Appendix A and incorporated herein by reference. Staff's *Memorandum* recommending approval of GMO's tariff sheets is attached hereto as Appendix B and incorporated herein by reference.

5. Staff has verified that the KCPL and GMO have filed their annual reports and are not delinquent on any assessment. 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 approving the following tariff sheets, as filed on December 18, 2012, and as substituted on January 3, 2013, for service on and after January 17, 2013, the requested effective date, or by allowing them to go into effect that date:

Kansas City Power & Light Company P.S.C. MO. No. 7

Eleventh Revised Sheet No. TOC-1, Cancelling Tenth Revised Sheet No. TOC-1

Fourth Revised Sheet No. 34, Cancelling Third Revised Sheet No. 34

Second Revised Sheet No. 34A, Cancelling First Revised Sheet No. 34A

Third Revised Sheet No. 34B, Cancelling Second Revised Sheet No. 34B

Second Revised Sheet No. 34C, Cancelling First Revised Sheet No. 34C

Second Revised Sheet No. 34D, Cancelling First Revised Sheet No. 34D

Third Revised Sheet No. 34E, Cancelling Second Revised Sheet No. 34E

First Revised Sheet No. 34F, Cancelling Original Sheet No. 34F

Original Sheet No. 34G

Original Sheet No. 34H

Original Sheet No. 34I

Original Sheet No. 34J
Original Sheet No. 34K
Original Sheet No. 34L
Original Sheet No. 34M
Original Sheet No. 34N
Original Sheet No. 34O
Original Sheet No. 34P
Original Sheet No. 34Q
Third Revised Sheet No. 40, Cancelling Second Revised Sheet No. 40
Fifth Revised Sheet No. 40A, Cancelling Fourth Revised Sheet No. 40A
Third Revised Sheet No. 40B, Cancelling Second Revised Sheet No. 40B;

and

KCP&L Greater Missouri Operations Company P.S.C. MO. No. 1

4th Revised Sheet No. 110, Canceling 3rd Revised Sheet No. 110
Original Sheet No. 110.1
4th Revised Sheet No. 111, Canceling 3rd Revised Sheet No. 111
3rd Revised Sheet No. 110, Canceling 2nd Revised Sheet No. 112
4th Revised Sheet No. 113, Canceling 3rd Revised Sheet No. 113
3rd Revised Sheet No. 114, Canceling 2nd Revised Sheet No. 114
3rd Revised Sheet No. 115, Canceling 2nd Revised Sheet No. 115
1st Revised Sheet No. 116, Canceling Original Sheet No. 116
3rd Revised Sheet No. 117, Canceling 2nd Revised Sheet No. 117
3rd Revised Sheet No. 118, Canceling 2nd Revised Sheet No. 118
3rd Revised Sheet No. 119, Canceling 2nd Revised Sheet No. 119
Original Sheet No. 119.1
Original Sheet No. 119.2
Original Sheet No. 119.3
Original Sheet No. 119.4
Original Sheet No. 119.5
Original Sheet No. 119.6
Original Sheet No. 119.7

Respectfully Submitted,

**STAFF OF THE MISSOURI
PUBLIC SERVICE COMMISSION**

/s/ John D. Borgmeyer

John D. Borgmeyer
Legal Counsel
Missouri Bar No. 61992

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Missouri Public Service Commission
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Jefferson City, Missouri 65102
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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 4th day of January, 2013.

/s/ John D. Borgmeyer

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EE-2013-0125 / File No. YE-2013-0273 – Kansas City Power & Light Company

FROM: Thomas M. Imhoff, Tariffs/Rate Design - Energy

<u>/s/ Tom Imhoff 1/04/13</u> Project Coordinator / Date	<u>/s/ John Borgmeyer 1/04/13</u> General Counsel's Office / Date
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SUBJECT: Staff Recommendation to Approve Kansas City Power & Light Company's Tariff Sheets for Net Metering Service.

DATE: January 4, 2013

On November 30, 2012 Kansas City Power & Light Company ("KCPL") filed revised net metering tariff sheets with the Missouri Public Service Commission ("Commission") in an effort to bring them into compliance with the Commission's revised net metering rule. KCPL and Staff had discussions relating to the revised net metering tariff sheets, which prompted KCPL to withdraw them, and file new ones on December 18, 2012, with changes based on those discussions. On January 3, 2013, KCPL filed a substitute tariff sheet to reflect language that was compliant with the rule.

Commission Rule 4 CSR 240-20.065 *Net Metering* (Rule) implements the "Net Metering and Easy Connection Act," which is codified at § 386.890, RSMo Supp. 2011. They apply to customer-owned generating systems of 100 kilowatts (kW) or less that are powered by renewable energy resources. For such systems the rule requires a simple application process which employs an all-in-one standard contract with a simple interconnection request, simple procedures, and a brief set of terms and conditions.

Effective August 30, 2012, the Commission updated its net metering rule for consistency with Rule 4 CSR 240-20.100 *Electric Utility Renewable Energy Standard Requirements*. KCPL actively worked with the Staff in proposing revisions to the Commission's net metering rule and, offering changes, most of which were adopted, to improve the standard contract. KCPL participated in the Commission's rulemaking hearing in Case No. EX-2012-0193 that resulted in these revisions to the Commission's net metering rule.

With these tariff sheets, KCPL is updating its net metering rider to conform with the Commission's revised net metering rule and to update the rates KCPL will credit energy from qualifying systems. After reviewing them, Staff recommends the Commission issue an order approving the following tariff sheets, as filed on December 18, 2012, and as substituted on January 3, 2013, for service on and after January 17, 2013, the requested effective date, or by allowing them to go into effect that date:

P.S.C. MO. No. 7

Eleventh Revised Sheet No. TOC-1, Cancelling Tenth Revised Sheet No. TOC-1
Fourth Revised Sheet No. 34, Cancelling Third Revised Sheet No. 34
Second Revised Sheet No. 34A, Cancelling First Revised Sheet No. 34A

Appendix A

Third Revised Sheet No. 34B, Cancelling Second Revised Sheet No. 34B
Second Revised Sheet No. 34C, Cancelling First Revised Sheet No. 34C
Second Revised Sheet No. 34D, Cancelling First Revised Sheet No. 34D
Third Revised Sheet No. 34E, Cancelling Second Revised Sheet No. 34E
First Revised Sheet No. 34F, Cancelling Original Sheet No. 34F
Original Sheet No. 34G
Original Sheet No. 34H
Original Sheet No. 34I
Original Sheet No. 34J
Original Sheet No. 34K
Original Sheet No. 34L
Original Sheet No. 34M
Original Sheet No. 34N
Original Sheet No. 34O
Original Sheet No. 34P
Original Sheet No. 34Q
Third Revised Sheet No. 40, Cancelling Second Revised Sheet No. 40
Fifth Revised Sheet No. 40A, Cancelling Fourth Revised Sheet No. 40A
Third Revised Sheet No. 40B, Cancelling Second Revised Sheet No. 40B

The Staff has verified that KCPL has filed its annual report and is not delinquent on any assessment. The Staff is not aware of any other matter before the Commission that affects or is affected by this filing.


Notary Public

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EE-2013-0125 / File No. YE-2013-0274 – KCP&L Greater Missouri
Operations Company

FROM: Thomas M. Imhoff, Tariffs/Rate Design - Energy

/s/ Tom Imhoff 1/04/13 /s/ John Borgmeyer 1/04/13
Project Coordinator / Date Staff Counsel's Office / Date

SUBJECT: Staff Recommendation to Approve KCP&L Greater Missouri Operations Company's
Tariff Sheets for Net Metering Service.

DATE: January 4, 2013

On November 30, 2012 KCPL&L Greater Missouri Operations Company ("GMO") filed revised net metering tariff sheets with the Missouri Public Service Commission ("Commission") in an effort to bring them into compliance with the Commission's revised net metering rule. GMO and Staff had discussions relating to the revised net metering tariff sheets, which prompted GMO to withdraw them, and file new ones on December 18, 2012, with changes based on those discussions. On January 3, 2013, GMO filed substitute tariff sheets to reflect language that was compliant with the rule and to correct typos.

Commission Rule 4 CSR 240-20.065 *Net Metering* (Rule) implements the *Net Metering and Easy Connection Act*, which is codified at § 386.890, RSMo Supp. 2011. They apply to customer-owned generating systems of 100 kilowatts (kW) or less that are powered by renewable energy resources. For such systems the rule requires a simple application process which employs an all-in-one standard contract with a simple interconnection request, simple procedures, and a brief set of terms and conditions.

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With these tariff sheets, GMO is updating its net metering rider to conform with the Commission's revised net metering rule and to update the rates GMO will credit energy from qualifying systems. After reviewing them, Staff recommends the Commission issue an order approving the following tariff sheets, as filed on December 18, 2012, and as substituted on January 3, 2013, for service on and after January 17, 2013, the requested effective date, or by allowing them to go into effect that date:

P.S.C. MO. No. 1

4th Revised Sheet No. 110, Canceling 3rd Revised Sheet No. 110
Original Sheet No. 110.1

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3rd Revised Sheet No. 119, Canceling 2nd Revised Sheet No. 119
Original Sheet No. 119.1
Original Sheet No. 119.2
Original Sheet No. 119.3
Original Sheet No. 119.4
Original Sheet No. 119.5
Original Sheet No. 119.6
Original Sheet No. 119.7

The Staff has verified that GMO has filed its annual report and is not delinquent on any assessment. The Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

