

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

|                                                |   |                                     |
|------------------------------------------------|---|-------------------------------------|
| In the Matter of the 2015 Triennial Integrated | ) |                                     |
| Resource Plan of KCP&L Greater Missouri        | ) | <b><u>File No. EE-2014-0328</u></b> |
| Operations Company Pursuant to 4 CSR 240-22    | ) |                                     |

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), by and through the Staff Counsel's Office, and files its Recommendation in response to the April 30, 2014 KCP&L Greater Missouri Operations Company ("GMO") Application For Variance Concerning The 2015 Triennial Integrated Resource Plan<sup>1</sup> to be filed by GMO. In response to GMO's variance request, the Staff states as follows:

1. GMO on April 30, 2014 requested, pursuant to Rule 4 CSR 240-22.080(13), a variance from Rule 4 CSR 240-22.045(3)(B)2 and Rule 4 CSR 240-22.045(3)(B)3 requiring Regional Transmission Organizations ("RTO") expansion plan analysis specific to its Missouri customers. Rule 4 CSR 240-22.045(3)(B)2 and Rule 4 CSR 240-22.045(3)(B)3 state as follows:

22.045(3)(B)2. The utility reviews the RTO transmission overall expansion plans each year to assess whether the RTO transmission expansion plans, in the judgment of the utility decision-makers, are in the interests of the utility's Missouri customers;

22.045(3)(B)3. The utility reviews the portion of RTO transmission expansion plans each year within its service territory to assess whether the RTO transmission expansion plans pertaining to projects that are partially- or fully-driven by economic considerations (i.e., projects that are not solely or primarily based on reliability considerations), in the judgment of the utility decision-makers, are in the interests of the utility's Missouri customers;

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<sup>1</sup> The Triennial Integrated Resource Plan is also referred to as the Triennial Chapter 22 Electric Resource Plan.

GMO asserts that good cause exists for the variance request because the data required by GMO to perform the Missouri specific analysis is not available. GMO says regional transmission plans are evaluated on utility/transmission owner costs and benefits, and results are not broken down by or identified on a state-by-state level.

2. On May 1, 2014, the Missouri Public Service Commission ("Commission") issued an Order Providing Notice, Establishing Time For Response And Order Directing Staff Recommendation in File No. EE-2014-0328. Therein the Commission directed the Staff to file a Recommendation, or in the alternative, a Status Report stating when it plans to file its Recommendation no later than May 22, 2014.

3. The Staff filed on May 22, 2014, a Motion For Extension Of Time to file the Staff Recommendation to May 23, 2014 due to the press of other Commission business. On May 23, 2014, the Commission issued an Order Extending The Deadline For Filing Staff Recommendation to May 23, 2014.

4. The Staff has no objection to the variance requested by GMO in its filing on April 30, 2014.

**WHEREFORE** the Staff files the instant Staff Recommendation that it has no objection to GMO's April 30, 2014 Application For Variance concerning its impending 2015 Triennial Integrated Resource Plan submission.

Respectfully submitted,

**/s/ Steven Dottheim**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing *Staff Recommendation* have been transmitted electronically to all counsel of record this 23<sup>rd</sup> day of May, 2014.

**/s/ Steven Dottheim**