

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

In the Matter of the Resource Plan of
Kansas City Power & Light Company

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File No. EO-2012-0323

**STAFF REPORT ON KCPL'S ELECTRIC UTILITY RESOURCE PLANNING
TRIENNIAL COMPLIANCE FILING**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through Staff Counsel Office, and pursuant to 4 CSR 240-22.080(7) files its *Staff Report on Kansas City Power & Light Company Electric Utility Resource Planning Compliance Filing*, attached hereto as Appendix A. With respect thereto, Staff states as follows:

1. On April 9, 2012, Kansas City Power & Light Company ("KCPL" or "Company") submitted its Chapter 22 Electric Resource Planning triennial compliance filing to the Missouri Public Service Commission ("Commission") in File No. EO-2012-0323.

2. On April 12, 2012, the Commission issued an Order Directing Notice and Setting Date for Submission of Intervention Requests, which directed all intervenors to file an application to do so no later than May 3, 2012.

3. On May 16, 2012, the Commission issued an Order Granting Applications to Intervene for The Midwest Energy Consumers Group; Dogwood Energy, LLC; Missouri Industrial Energy Consumers; Sierra Club, Earth Island Institute, d/b/a Renew Missouri, and the Natural Resources Defense Council; the Missouri Department of Natural Resources; the Missouri Joint Municipal Electric Utility Commission; and Southern Union Company, d/b/a Missouri Gas Energy.

3. Per Rule 4 CSR 240-22.080(7), Staff has conducted a limited review of KCPL's Chapter 22 triennial compliance filing and identified eleven (11) deficiencies and six (6)

concerns. Staff recommends remedies for each of these identified deficiencies and concerns and recommends that many of the deficiencies and concerns be addressed during the Company's April 1, 2013 annual update filing.

4. Staff notes that in KCPL's transmittal filing letter and Volume 8, page 25 of KCPL's filing, KCPL requests that the Commission acknowledge it is reasonable for KCPL and KCP&L Greater Missouri Operations Company ("GMO") to perform resource planning on a joint company basis, i.e., as a merged company rather than on a stand-alone company basis. Staff is opposed to KCPL's request for reasons addressed by Staff in its *Report*.

5. Staff also opposes KCPL's request in Volume 8, page 25 of its filing that the Commission find KCPL's Preferred Resource Plan reasonable as of its filing. Staff is opposed to this request for reasons addressed by Staff in its *Report*.

WHEREFORE, Staff files its *Staff Report on Kansas City Power & Light Company Electric Utility Resource Planning Compliance Filing*, attached hereto as Appendix A, recommends, among other things, the Commission deny KCPL's request for acknowledgment that it is reasonable for KCPL and GMO to perform resource planning on a joint company basis and deny KCPL's request that its Preferred Resource Plan be found reasonable as filed. Further recommendations are included in Staff's *Report*.

/s/ Amy E. Moore

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted electronically to all counsel of record this 6th day of September, 2012.

/s/ Amy E. Moore