

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

In the Matter of the Eighth Prudence Review of)
Costs Subject to the Commission-Approved) **File: EO-2019-0067**
Fuel Adjustment Clause of KCP&L Greater)
Missouri Operations Company)

In the Matter of the Second Prudence Review)
of Costs Subject to the Commission-Approved) **File: EO-2019-0068**
Fuel Adjustment Clause of Kansas City Power)
and Light Company)

In the Matter of the Application of KCP&L Greater)
Missouri Operations Company Containing Its) **File: ER-2019-0199**
Semi-Annual Fuel Adjustment Clause True-Up)

**LIST OF ISSUES, ORDER OF WITNESSES,
OPENING STATEMENTS AND CROSS-EXAMINATION**

COMES NOW Staff of the Missouri Public Service Commission (“Staff”), on behalf of itself and Kansas City Power & Light Company (“KCPL”), KCP&L Greater Missouri Operations Company (“GMO”), and the Office of the Public Counsel (“OPC”) (collectively “Parties”), pursuant to the Commission’s *Order Granting Consolidation, Setting Procedural Schedule, and Further Suspending True-up Timeline* (“Order”) issued on March 21, 2019, and submits the following List of Issues, Order of Witnesses, Opening Statements and Cross-Examination, and in support thereof states as follows:

1. File No. EO-2019-0067, captioned *In the Matter of the Eighth Prudence Review of Costs Subject to the Commission-Approved Fuel Adjustment Clause of KCP&L Greater Missouri Operations Company*, was opened to provide a prudence review of the costs and revenues associated with GMO’s fuel adjustment clause (“FAC”) as required by law for the period December 1, 2016 through May 31, 2018. This Review Period

corresponds to the twentieth, twenty-first, and twenty-second sequential FAC accumulation periods (each accumulation period is 6 months) of GMO's FAC.

2. File No. EO-2019-0068, captioned *In the Matter of the Second Prudence Review of Costs Subject to the Commission-Approved Fuel Adjustment Clause of Kansas City Power and Light Company*, was opened to provide a prudence review of the costs and revenues associated with KCPL's FAC as required by law for the period January 1, 2017 through June 30, 2018. This Review Period corresponds to the fourth, fifth, and sixth FAC accumulation periods (each accumulation period is 6 months) of KCPL's FAC.

3. File No. ER-2019-0199, captioned *In the Matter of the Application of KCP&L Greater Missouri Operations Company Containing Its Semi-Annual Fuel Adjustment Clause True-Up*, involved GMO's application containing its 20th FAC true-up filing to identify the amounts of over or under-recovery of the FAC for Recovery Period 20 (September 1, 2017 through August 31, 2018) as provided by law.

4. On March 21, 2019, the Commission issued its *Order Granting Consolidation, Setting Procedural Schedule, and Further Suspending True-up Timeline* in which it consolidated File Nos. ER-2019-0199 and EO-2019-0068 into File No. EO-2019-0067 for all purposes, due to the cases sharing common questions of law and fact. The Order also provided for a List of Issues, Order of Witnesses, Opening Statements and Cross-Examination to be filed August 9, 2019.

List of Issues

Issue (1) A. Was it imprudent, or in violation of its Rider FAC tariff, for KCPL to allow 722,628 renewable energy credits ("RECs") to expire during the review period of

File EO-2019-0068 rather than take action which would have allowed KCPL to generate revenues from those RECs? B. If it was, what if any adjustment should the Commission order?

Witnesses Issue 1

KCPL/GMO: Jeff Martin

Staff: Kory Boustead

OPC: Geoff Marke, Lena M. Mantle

Additional KCPL/GMO – OPC Issues

Issue (2) A. Has GMO appropriately allocated the costs associated with auxiliary power between the electric operations and the steam operations at GMO's Lake Road plant? B. If not, what if any adjustment should the Commission order for the review period of File EO-2019-0067? C. Should the Commission order GMO to calculate the fuel cost of the steam operations auxiliary power that was recovered through the FAC since July 1, 2011, and return that amount plus interest at its short-term borrowing rate back to GMO's customers? D. Should the Commission Order GMO to make adjustments to the method by which it allocates auxiliary power between the electric operations and the steam operations at GMO's Lake Road plant for the 23rd Accumulation Period and/or any future FAC rate change cases?

Witnesses Issue 2

KCPL/GMO: Linda Nunn

Staff: (Staff has no witness on this specific issue; however, if the Commission has questions for Staff, Staff will make necessary witnesses available)

OPC: Lena M. Mantle

Issue (3) A. Was it prudent for GMO to have entered into Purchase Power Agreements with the Rock Creek and Osborn Wind Projects under the terms of the contracts as executed? B. If it was not prudent, what if any adjustment should the Commission order?

Witnesses Issue 3

KCPL/GMO: Burton L. Crawford

Staff: (Staff has no witness on this specific issue; however, if the Commission has questions for Staff, Staff will make necessary witnesses available)

OPC: Lena M. Mantle

Order of Cross-Examination

Issue 1:

KCPL/GMO witnesses: Intervenors, OPC, Staff

Staff witnesses: Intervenors, OPC, KCPL/GMO

OPC witnesses: Intervenors, Staff, KCPL/GMO

Issues 2 and 3:

KCPL/GMO witnesses: Intervenors, Staff, OPC

Staff witnesses: Intervenors, KCPL/GMO, OPC

OPC witnesses: Intervenors, Staff, KCPL/GMO

Order of Opening Statements

KCPL/GMO

Staff

OPC

Intervenors (if any)

WHEREFORE, Staff, on behalf of the Parties, submits this List of Issues, Order of Witnesses, Opening Statements and Cross-Examination as ordered by the Commission.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 9th day of August, 2019.

/s/ Jeffrey A. Keevil