

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

In the Matter of the Resource Plan of)
KCP&L Greater Missouri Operations Company)

File No. EO-2012-0324

**STAFF REPORT ON KCP&L GREATER MISSOURI OPERATIONS 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 KCP&L Greater Missouri Operations Company Electric Utility Resource Planning Compliance Filing*, attached hereto as Appendix A. With respect thereto, Staff states as follows:

1. On April 9, 2012, KCP&L Greater Missouri Operations Company (“GMO” or “Company”) submitted its Chapter 22 Electric Resource Planning triennial compliance filing to the Missouri Public Service Commission (“Commission”) in File No. EO-2012-0324.

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; City of Kansas City; the Missouri Department of Natural Resources; the Missouri Joint Municipal Electric Utility Commission; Southern Union Company, d/b/a Missouri Gas Energy; and Midwest Energy Users’ Association.

3. Per Rule 4 CSR 240-22.080(7), Staff has conducted a limited review of GMO’s Chapter 22 triennial compliance filing and identified ten (10) deficiencies and seven (7) 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 GMO's transmittal filing letter and Volume 8, page 25 of GMO's filing, GMO requests that the Commission acknowledge it is reasonable for GMO and Kansas City Power & Light Company ("KCPL") 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 GMO's request for reasons addressed by Staff in its *Report*.

5. Staff also opposes GMO's request in Volume 8, page 26 of its filing that the Commission find GMO'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 KCP&L Greater Missouri Operations 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 GMO and KCPL to perform resource planning on a joint company basis and deny GMO's request that its Preferred Resource Plan be found reasonable as filed. Further recommendations are included in Staff's *Report*.

/s/ Amy E. Moore

Amy E. Moore
Legal Counsel
Missouri Bar No. 61759

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-4140 (Telephone)
(573) 751-9285 (Fax)
amy.moore@psc.mo.gov

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