

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

In the Matter of KCP&L Greater Missouri	)	
Operations Company's 2013 Annual Renewable	)	File No. EO-2013-0505
Energy Standard (RES) Compliance Plan	)	

**MISSOURI DEPARTMENT OF NATURAL RESOURCES'  
RESPONSE AND REQUEST FOR ADDITIONAL TIME**

COMES NOW Missouri Department of Natural Resources (MDNR) and, pursuant to the Commission's Order Directing Notice and Setting Filing Deadline, files this Response and Request for Additional Time.

1. On May 28, 2013, KCP&L Greater Missouri Operations (GMO) filed its 2013 Annual Renewable Energy Standard Compliance Plan.
2. The Commission granted MDNR's Application for Intervention on July 8. In response to a Data Request, on July 8, MDNR obtained from GMO excel worksheets for the calculation of the RES Retail Rate Impact. MDNR staff immediately commenced review of the calculation, but has found that the summary worksheet cannot be fully understood without further explanation which, due to the press of other matters, staff turnover and availability issues, was not clearly determined in time to seek an extension ahead of the filing deadline set by the Commission.
3. The Retail Rate Impact calculation is an important element of the RES Compliance Plan, and the complexity of the supporting documentation for GMO's calculation warrants additional time for study and explanation. MDNR requests additional time to obtain information and explanation from GMO either individually, or in a meeting for all interested parties.

4. Complicating this matter is the fact that GMO has filed in this docket its Motion to Approve a tariff which would suspend payment of solar rebates for 2013 beginning September 1, 2013, due to GMO's calculation that the 1% retail rate impact would be exceeded in July. This development makes it even more essential for the rate impact calculation to be rigorously examined by as many parties as possible. The Commission has ordered responses to the tariff filing by no later than July 30. MDNR requests that additional time be given to it and other interested parties to address GMO's retail rate impact calculation on the same schedule as the responses to the tariffs; that is, no later than July 30. This request is being filed as timely as possible.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that the Commission grant it until July 30, 2013 to file its Comments on GMO's RES Compliance Plan.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 12 day of July 2013.

/s/Jessica L. Blome \_\_\_\_\_  
Jessica L. Blome