

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

In the Matter of Kansas City Power & Light Company's Notice of Intent to File an Application for Authority to Establish a Demand-Side Programs Investment Mechanism)	
)	
)	<u>File No. EO-2015-0240</u>
)	YE-2016-0230
)	YE-2016-0231

In the Matter of KCP&L Greater Missouri Operations Company's Notice of Intent to File an Application for Authority to Establish a Demand-Side Programs Investment Mechanism)	
)	
)	<u>File No. EO-2015-0241</u>
)	YE-2016-0232

**STAFF RECOMMENDATION FOR APPROVAL OF COMPLIANCE TARIFF SHEETS
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and for its Recommendation For Approval of Compliance Tariff Sheets and Motion For Expedited Treatment states as follows:

1. On March 16, 2016 Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO")(collectively the "Company") filed their Missouri Energy Efficiency Investment Act ("MEEIA") programs and demand-side programs investment mechanism compliance tariff sheets along with a motion for expedited approval on less than thirty days' notice to become effective April 1, 2016, when the Company will begin implementing its energy efficiency programs. On March 21, 2016, the Company filed three substitute tariff sheets to make a non-substantive correction to revision numbers on the tariff sheets.

2. On March 17, 2016, the Commission issued its *Order Directing Filing Of Staff Recommendation Regarding Compliance Tariffs* directing Staff to file its

recommendation no later than March 22, 2016, regarding the Company's tariff sheets and its motion for expedited treatment.

3. The Staff has reviewed the tariff sheets filed by the Company, as substituted, and for the reasons stated in its Memorandum attached as Appendix A and incorporated herein, recommends that the Commission approve the tariff sheets listed on pages 1-2 of the Memorandum to go into effect on less than thirty days' notice on April 1, 2016, the requested effective date.

4. The Company's *Motion for Expedited Treatment* ("Motion") filed with its compliance tariff sheets comports with Commission rule 4 CSR 240-2.080(14). Staff recommends the Commission grant the Company's *Motion* and approve the tariff sheets to become effective April 1, 2016, because to do so would eliminate confusion or further delay in making the Company's MEEIA Cycle 2 energy-efficiency programs available to its customers.

WHEREFORE, for the reasons stated above, the Staff respectfully requests the Commission approve the MEEIA tariff sheets of KCP&L and GMO as listed in the attached Memorandum to become effective on April 1, 2016.

Respectfully submitted,

/s/ Robert S. Berlin

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Missouri Public Service Commission
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 22nd day of March, 2016 to all counsel of record in this proceeding.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case Files
Case No. EO-2015-0240, Tariff Tracking Nos. YE-2016-0230 and YE-2016-0231
Kansas City Power & Light Company
Case No. EO-2015-0241, Tariff Tracking No. YE-2016-0232
KCP&L Greater Missouri Operations Company

FROM: Brad J. Fortson, Regulatory Economist III
Michael L. Stahlman, Regulatory Economist III
Tammy Huber, Utility Policy Analyst II

/s/John A. Rogers 3/22/2016
Manager Energy Resources Department

/s/Robert S. Berlin 3/22/2016
Staff Counsel Department

/s/Michael S. Scheperle 3/22/2016
Manager Economic Analysis Unit

SUBJECT: Recommendation for Approval of Compliance Tariff Sheets on Less Than Thirty Days’ Notice.

DATE: March 22, 2016

On March 16, 2016, Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively “Company”), filed with the Commission its MEEIA Cycle 2 compliance tariff sheets and a *Motion for Expedited Treatment*. The compliance tariff sheets carry an effective date of April 15, 2016, but the Company filed motions for expedited treatment asking the Commission to approve the tariff sheets to take effect, on less than thirty (30) days’ notice, on April 1, 2016 when the Company will begin implementation of its MEEIA Cycle 2 programs. On March 21, 2016, the Company filed three substitute tariff sheets to correct only the revision numbers on the tariff sheets.

Staff Recommendation

The Commission Staff (“Staff”) has reviewed the filed and substituted compliance tariff sheets of KCP&L and GMO and recommends the Commission approve the following compliance tariff sheets as filed on March 16, 2016 or substituted on March 21, 2016 to go into effect for service, on less than thirty days’ notice, on the requested effective date April 1, 2016:

KCP&L

P.S.C. MO. No. 2 Sheet No. 1.04B
Eighth Revised Sheet No. 1.04B Cancelling Seventh Revised Sheet No. 1.04B

P.S.C. MO. No. 2 Sheet No. 1.04C
Original Sheet No. 1.04C

P.S.C. MO. No. 2 Sheet Nos. 1.96 – 2.34
Original Sheet Nos. 1.96 – 2.34

P.S.C. MO. No. 7 Sheet No. 49
Third Revised Sheet No. 49 Cancelling Second Revised Sheet No. 49

P.S.C. MO. No. 7 Sheet No. 49A
First Revised Sheet No. 49A Cancelling Original Sheet No. 49A

P.S.C. MO. No. 7 Sheet No. 49E
Fourth Revised Sheet No. 49E Cancelling Third Revised Sheet No. 49E

P.S.C. MO. No. 7 Sheet No. 49F – 49P
Original Sheet Nos. 49F – 49P

GMO

P.S.C. MO. No. 1 Sheet No. R-3
Thirteenth Revised Sheet No. R-3 Cancelling Twelfth Revised Sheet No. R-3

P.S.C. MO. No. 1 Sheet No. R-3.01
First Revised Sheet No R-3.01 Cancelling Original Sheet No. R-3.01

P.S.C. MO. No. 1 Sheet Nos. R-63.22 – R-63.25
First Revised Sheet Nos. R-63.22 – R-63.25 Cancelling Original Sheet Nos. R-63.22 – R63.25

P.S.C. MO. No. 1 Sheet No. R-63.26
Second Revised Sheet No. R-63.26 Cancelling First Revised Sheet No. R-63.26

P.S.C. MO. No. 1 Sheet No. R-68
Fourth Revised Sheet No. R-68 Cancelling Third Revised Sheet No. R-68

P.S.C. MO. No. 1 Sheet Nos. R-73 – R-109
Original Sheet Nos. R-73 – R-109

P.S.C. MO. No. 1 Sheet Nos. 138 – 138.8
Original Sheet Nos. 138 – 138.8

Because this filing was made on less than thirty days' notice, an order by the Commission is necessary to approve the Company's compliance tariff sheets to be effective on April 1, 2016. Staff agrees with the Company's motions for expedited approval that good cause exists to make these tariff sheets effective on less than thirty days' notice because doing so will allow the Company to begin implementing MEEIA Cycle 2 programs on April 1, 2016.

Staff's recommendation for approval of the change in DSIM rates for KCP&L and GMO is solely based on the accuracy of Company's calculations outlined above and is not indicative of the prudence of costs included in the DSIM rates.

Staff has verified that KCPL and GMO have filed their annual reports and are not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI


In the Matter of Kansas City Power & Light Company's Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism))	Case No. EO-2015-0240
))	
In the Matter of KCP&L Greater Missouri Operations Company's Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism))	Case No. EO-2015-0241
))	

AFFIDAVIT OF BRAD J. FORTSON

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW Brad J. Fortson and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Memorandum and that the same is true and correct according to his best knowledge and belief.

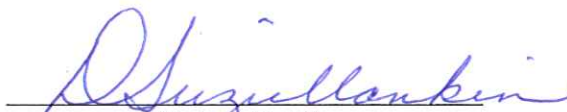
Further the Affiant sayeth not.


BRAD J. FORTSON

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 21 day of March, 2016.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: December 12, 2016 Commission Number: 12412070
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Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

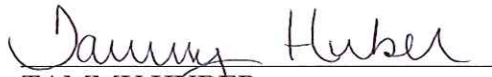
In the Matter of Kansas City Power & Light Company's Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism))	Case No. EO-2015-0240
))	
In the Matter of KCP&L Greater Missouri Operations Company's Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism))	Case No. EO-2015-0241
))	

AFFIDAVIT OF TAMMY HUBER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW Tammy Huber and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Memorandum; and that the same is true and correct according to her best knowledge and belief.

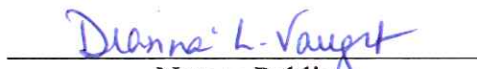
Further the Affiant sayeth not.


TAMMY HUBER

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 22nd day of March, 2016.

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 28, 2019 Commission Number: 15207377


Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light)
Company's Filing for Approval of Demand-) Case No. EO-2015-0240
Side Programs and for Authority to Establish)
a Demand-Side Programs Investment)
Mechanism)

In the Matter of KCP&L Greater Missouri)
Operations Company's Filing for Approval) Case No. EO-2015-0241
of Demand-Side Programs and for Authority)
to Establish a Demand-Side Programs)
Investment Mechanism)

AFFIDAVIT OF MICHAEL L. STAHLMAN

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

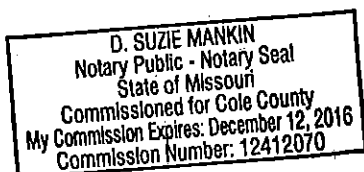
COMES NOW Michael L. Stahlman and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Memorandum and that the same is true and correct according to his best knowledge and belief.

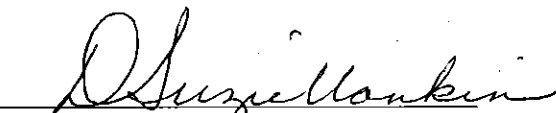
Further the Affiant sayeth not.


MICHAEL L. STAHLMAN

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 22nd day of March, 2016.




Notary Public