

**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)	<u>Case No. EO-2015-0240</u>
Programs and for Authority to Establish a Demand)	YE-2018-0149
Side Programs Investment Mechanism)	YE-2018-0155

In the Matter of KCP&L Greater Missouri Operations)	
Company's Filing for Approval of Demand-Side)	<u>Case No. EO-2015-0241</u>
Programs and for Authority to Establish a Demand-)	YE-2018-0150
Side Programs Investment Mechanism)	

STAFF RECOMMENDATION FOR APPROVAL OF TARIFF SHEETS

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its recommendation for approval of tariff sheets states:

1. On May 4, 2018 Kansas City Power & Light Company ("KCPL") and KCP&L Greater Missouri Operations Company ("GMO")(collectively the "Companies") filed original and revised tariff sheets¹ reflecting modifications to certain Missouri Energy Efficiency Investment Act ("MEEIA") Cycle 2 programs: the Business and Residential Programmable Thermostat, Demand Response Incentive, Whole House Efficiency, and Income-Eligible Multi-Family programs. On May 7th, the Commission ordered the Staff to file its recommendation regarding the filed tariff sheets.

2. The Staff has reviewed the original and revised tariff sheets filed by the Companies. For the reasons more fully explained in Staff's Memorandum, attached hereto as "Appendix A" and incorporated herein, the Staff recommends the Commission either approve the filed tariff sheets or allow them to go into effect for service on the requested effective date of June 3, 2018.

¹ KCPL P.S.C. MO. No. 2 Original Sheet No. 2.14 was unintentionally excluded from the May 4, 2018 filing and was filed on May 10, 2018 in Tariff Tracking No. YE-2018-0155.

WHEREFORE, for the reasons stated above and in Staff's Memorandum, the Staff respectfully requests the Commission either approve the following tariff sheets or allow them to go into effect for service on June 3, 2018:

KCPL

P.S.C. MO. No. 2 Sheet No. 2.07

First Revised Sheet No. 2.07 Cancelling Original Sheet No. 2.07

P.S.C. MO. No. 2 Sheet No. 2.09 – 2.13

First Revised Sheet No. 2.09 Cancelling Original Sheet No. 2.09

First Revised Sheet No. 2.10 Cancelling Original Sheet No. 2.10

First Revised Sheet No. 2.11 Cancelling Original Sheet No. 2.11

First Revised Sheet No. 2.12 Cancelling Original Sheet No. 2.12

First Revised Sheet No. 2.13 Cancelling Original Sheet No. 2.13

P.S.C. MO. No. 2 Sheet No. 2.14

Original Sheet No. 2.14

P.S.C. MO. No. 2 Sheet No. 2.26

Second Revised Sheet No. 2.26 Cancelling First Revised Sheet No. 2.26

P.S.C. MO. No. 2 Sheet No. 2.30

First Revised Sheet No. 2.30 Cancelling Original Sheet No. 2.30

P.S.C. MO. No. 2 Sheet No. 2.31

Original Sheet No. 2.31

P.S.C. MO. No. 2 Sheet No. 2.32

First Revised Sheet No. 2.32 Cancelling Original Sheet No. 2.32

GMO

P.S.C. MO. No. 1 Sheet No. R-84

First Revised Sheet No. R-84 Canceling Original Sheet No. R-84

P.S.C. MO. No. 1 Sheet No. R-86 – R90

1st Revised Sheet No. R-86 Canceling Original Sheet No. R-86

1st Revised Sheet No. R-87 Canceling Original Sheet No. R-87

1st Revised Sheet No. R-88 Canceling Original Sheet No. R-88

1st Revised Sheet No. R-89 Canceling Original Sheet No. R-89
1st Revised Sheet No. R-90 Canceling Original Sheet No. R-90

P.S.C. MO. No. 1 Sheet No. R-102

Second Revised Sheet No. R-102 Canceling First Revised Sheet No. R-102

P.S.C. MO. No. 1 Sheet No. R-105

1st Revised Sheet No. R-105 Canceling Original Sheet No. R-105

P.S.C. MO. No. 1 Sheet No. R-105.1

Original Sheet No. R-105.1

P.S.C. MO. No. 1 Sheet No. R-107

First Revised Sheet No. R-107 Canceling Original Sheet No. R-107

Respectfully submitted,

/s/ Robert S. Berlin

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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 16th day of May, 2018 to all counsel of record in this proceeding.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case Files
File No. EO-2015-0240, Tariff Tracking Nos. YE-2018-0149
and YE-2018-0155
Kansas City Power & Light Company
File No. EO-2015-0241, Tariff Tracking No. YE-2018-0150
KCP&L Greater Missouri Operations Company

FROM: Brad J. Fortson, Regulatory Economist III

DATE: /s/ John Rogers 5/16/2018 /s/ Bob Berlin 5/16/2018
Energy Resources Department / Date Staff Counsel Department / Date

SUBJECT: Staff Recommendation for Approval of Original and Revised Tariff Sheets for
Kansas City Power & Light Company and KCP&L Greater Missouri Operations
Company

DATE: May 16, 2018

On May 4, 2018, Kansas City Power & Light Company (“KCPL”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively “Companies”), filed with the Commission original and/or revised tariff sheets reflecting modifications to the Business and Residential Programmable Thermostat (“Thermostat”), Demand Response Incentive (“DRI”), Whole House Efficiency, and Income-Eligible Multi-Family (“IEMF”) programs. On May 7, 2018, the Commission ordered Staff to file a recommendation regarding the revised tariff sheets no later than May 16, 2018.

For the Thermostat programs tariff sheets,¹ the Companies have added language to the tariff sheets to give the Companies the right to limit programs participation. The Companies are in the final program year of their Missouri Energy Efficiency Investment Act (“MEEIA”) Cycle 2. The Thermostat programs have met and exceeded their energy and demand savings targets. The language being added to the tariff sheets would allow the Companies to limit participation in the Thermostat programs and shift any remaining Thermostat programs budget to other programs to help those programs reach their savings targets in the final MEEIA Cycle 2 program year.

The DRI tariff sheets² are being modified to add Automated Demand Side Management (“ADSM”) as a DRI option in addition to the option for traditional DRI. Under ADSM, a participant with load curtailment potential during the curtailment season and designated curtailment hours enrolls directly with the Companies or one of the Companies-approved ADSM aggregators. The Companies then remotely interact with the participant’s building energy

¹ KCPL – P.S.C. MO. No. 2 First Revised Sheet No. 2.07 and P.S.C. MO. No. 2 First Revised Sheet No. 2.32; GMO – P.S.C. MO. No. 1 First Revised Sheet No. R-84 and P.S.C. MO. No. 1 First Revised Sheet No. R-107.

² KCPL – P.S.C. MO. No. 2 First Revised Sheet Nos. 2.09 – 2.13 and Original Sheet No. 2.14; GMO – P.S.C. MO. No. 1 1st Revised Sheet No. R-86 – R-90.

management system to measure, analyze, and report near real time curtailable load capacity. This two-way communication system creates a near real-time bridge between the Companies and the participant's curtailable equipment. The participant or their aggregator receives the curtailment event notice from the Companies and then sends the signal to the energy management system to control individual equipment loads to meet necessary kW load reduction. Traditional DRI participants receive financial incentives through the curtailment season for DRI program participation and payments for successful hourly event performance. ADSM participants will receive a financial incentive for participation, but no per event payment.

The Whole House Efficiency and IEMF programs tariff sheets³ are being revised by the Companies to add language to joint deliver these programs with Spire Missouri, Inc. d/b/a Spire ("Spire"). The Companies will joint deliver these programs with Spire so that eligible customers utilizing the Companies' and Spire's services may receive energy savings from each respective utility.

STAFF RECOMMENDATION

Staff has reviewed the filed original tariff sheets and revised tariff sheets and recommends the Commission approve the following tariff sheets as filed on May 4, 2018,⁴ to go into effect for service on the requested effective date of June 3, 2018.

KCPL

P.S.C. MO. No. 2 Sheet No. 2.07

First Revised Sheet No. 2.07 Cancelling Original Sheet No. 2.07

P.S.C. MO. No. 2 Sheet No. 2.09 – 2.13

First Revised Sheet No. 2.09 Cancelling Original Sheet No. 2.09

First Revised Sheet No. 2.10 Cancelling Original Sheet No. 2.10

First Revised Sheet No. 2.11 Cancelling Original Sheet No. 2.11

First Revised Sheet No. 2.12 Cancelling Original Sheet No. 2.12

First Revised Sheet No. 2.13 Cancelling Original Sheet No. 2.13

P.S.C. MO. No. 2 Sheet No. 2.14

Original Sheet No. 2.14

³ KCPL – P.S.C. MO. No. 2 Second Revised Sheet No. 2.26 and P.S.C. MO. No. 2 First Revised Sheet No. 2.30 and Original Sheet No. 2.31; GMO – P.S.C. MO. No. 1 Second Revised Sheet No. R-102 and P.S.C. MO. No. 1 1st Revised Sheet No. R-105 and Original Sheet No. R-105.1.

⁴ KCPL P.S.C. MO. No. 2 Original Sheet No. 2.14 was unintentionally excluded from the May 4, 2018, filing and was filed May 10, 2018, in Tariff Tracking No. YE-2018-0155.

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P.S.C. MO. No. 2 Sheet No. 2.26

Second Revised Sheet No. 2.26 Cancelling First Revised Sheet No. 2.26

P.S.C. MO. No. 2 Sheet No. 2.30

First Revised Sheet No. 2.30 Cancelling Original Sheet No. 2.30

P.S.C. MO. No. 2 Sheet No. 2.31

Original Sheet No. 2.31

P.S.C. MO. No. 2 Sheet No. 2.32

First Revised Sheet No. 2.32 Cancelling Original Sheet No. 2.32

GMO

P.S.C. MO. No. 1 Sheet No. R-84

First Revised Sheet No. R-84 Canceling Original Sheet No. R-84

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1st Revised Sheet No. R-86 Canceling Original Sheet No. R-86

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P.S.C. MO. No. 1 Sheet No. R-102

Second Revised Sheet No. R-102 Canceling First Revised Sheet No. R-102

P.S.C. MO. No. 1 Sheet No. R-105

1st Revised Sheet No. R-105 Canceling Original Sheet No. R-105

P.S.C. MO. No. 1 Sheet No. R-105.1

Original Sheet No. R-105.1

P.S.C. MO. No. 1 Sheet No. R-107

First Revised Sheet No. R-107 Canceling Original Sheet No. R-107

Staff also recommends that – in the future - GMO be consistent in its numbering of revised tariff sheets, e. g., First vs. 1st, etc.

Staff has verified that the Companies are current on their annual report filings 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 Notice of Intent to File)
Application for Authority to Establish a Demand-) File No. EO-2015-0240
Side Programs Investment Mechanism)

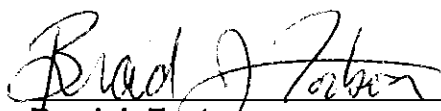
In the Matter of KCP&L Greater Missouri Operations)
Company's Notice of Intent to File an)
Application for Authority to Establish a Demand-) File No. EO-2015-0241
Side Programs Investment Mechanism)

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 attached Staff 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 16th day of May, 2018.



NOTARY PUBLIC

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