

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

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|--|---|-----------------------|
| In the Matter of Kansas City Power & Light | ) |                       |
| Company's 2013 Annual Renewable Energy     | ) | File No. EO-2013-0504 |
| 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 filed its 2013 Annual Renewable Energy Standard Compliance Plan.
2. The Commission granted MDNR's Application for Intervention on July 11. In response to a Data Request, on July 8, MDNR obtained from KCP&L excel worksheets for the calculation of the RES Retail Rate Impact. MDNR staff has worked diligently to review the calculation, but has found that the summary worksheet cannot be fully understood without further explanation which, due to the press of other matters, and staff scheduling issues, was not clearly determined in time to seek a call or meeting with the Company or to seek an extension of time to file comments 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 KCPL's calculation warrants additional time for study and explanation. MDNR requests additional time to obtain information and explanation from KCPL, either individually or with other interested parties, and will make every effort to accomplish this by July 30, 2013. This date is the same as MDNR has requested

for filing its comments in response to the KCP&L GMO's RES compliance plan (EO-2013-0505) and solar rebate tariff cases (YE-2014-0011 and EO-2013-0505). MDNR's initial review indicates that the Ameren, KCPL and GMO calculations appear to have many similarities and may garner similar comments upon closer review. In the Ameren RES compliance plan case, the Commission has granted an extension to the Missouri Industrial Energy Consumers group (MIEC) until August 2, 2013 to permit full review of Ameren's rate impact calculation (EO-2013-0503, Order issued July 11, 2013). Thus, granting MDNR's request will keep the deadlines for comments in these three cases in relative proximity to each other, which is appropriate. 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 KCPL'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<sup>th</sup> day of July 2013.

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