

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

In the Matter of the Staff Investigation of Solar)
Rebate Payments Pursuant to the Renewable)
Energy Standard and the Commission's Rules)

File No. EO-2014-_____

STAFF MOTION TO OPEN AN INVESTIGATION

COMES NOW, Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and moves the Commission to order Staff to investigate Kansas City Power & Light Company's, KCP&L Greater Missouri Operations Company's and Union Electric Company's d/b/a Ameren Missouri compliance with Rule 4 CSR 240-20.100(4) regarding solar rebate payments to their retail account holders and to open a file for purposes of receiving Staff's report of its investigation. In support thereof, Staff states:

1. Staff has been engaged in responding to informal complaints and email correspondence made by retail account holders and solar generation installers for some time now regarding the 30-day requirement for solar rebate payments that is part of Rule 4 CSR 240-20.100(4)(K).

2. In general, Chapters 386 and 393 empower the Commission to authorize the Staff to conduct investigations as to any matter of which complaint may be made with a view to the public welfare, efficient utility facilities, and substantial justice between customers and public utilities.¹

¹ See *generally* Sections 386.040, 386.250(7), 386.240, 393.130.1 and 393.270.1, RSMo. See also Commission Rule 4 CSR 240-2.070(1).

3. Section 386.420.2, RSMo (2000) provides, in pertinent part, that whenever an investigation is made, a report shall be made and "...shall state the conclusions of the commission, together with its decision, order or requirement in the premises...."

4. Opening a file for receiving Staff's report will also provide an avenue to address discovery disputes that may arise during Staff's investigation.

5. Staff plans to request information not only from the electrical corporations, but also from retail account holders that have installed solar generation systems interconnected with the electric systems of Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company and Union Electric Company d/b/a Ameren Missouri, as well as the related solar generation installers.

WHEREFORE, Staff moves the Commission to order Staff to investigate Kansas City Power & Light Company's, KCP&L Greater Missouri Operations Company's and Union Electric Company's d/b/a Ameren Missouri compliance with Rule 4 CSR 240-20.100(4) regarding solar rebate payments to their retail account holders, to order Staff to prepare a report of its investigation where Staff states its conclusions and recommendation(s), and to open a file for purposes of receiving Staff's report.

Respectfully submitted,

/s/ Kevin A. Thompson

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Public Service Commission

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been transmitted electronically to Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, Union Electric Company d/b/a Ameren Missouri, and the Office of the Public Counsel this 16th day of June, 2014.

/s/ Kevin A. Thompson