

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

In the Matter of Kansas City Power & Light Company's Submission of Its 2013 Renewable Energy Standard Compliance Report)
)
) **File No. EO-2014-0289**
)

In the Matter of KCP&L Greater Missouri Operations Company's Submission of Its 2013 Renewable Energy Standard Compliance Report)
)
) **File No. EO-2014-0290**
)

STAFF'S RESPONSE TO ORDER DIRECTING FILING

COMES NOW Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and submits this response to the Missouri Public Service Commission. In support, Staff respectfully states the following:

1. On April 15, 2014, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company ("Companies") each filed its *2014 Annual Renewable Energy Standard Compliance Plan*, as well as its *2013 Renewable Energy Standard Compliance Report* ("*Compliance Report*") that contained requests for waivers from providing meter readings from renewable resources not owned by the Companies.

2. On April 16, 2014, the Commission issued an *Order Directing Notice and Setting Filing Deadlines*, in which it directed Staff to file a response to the Companies' request for waivers by April 25, 2014. This response complies with the Commission's Order.

3. Rule 4 CSR 240-20.100(7) states, "Each electric utility shall file an RES compliance report no later than April 15 to report on the status of the utility's compliance with the renewable energy standard and the electric utility's compliance plan as described in this section for the most recently completed calendar year."

Subparagraphs (7)(A)1.A. through N. of the Rule provide the minimum requirements for the *Compliance Report*.

4. The Companies requested waivers of subparagraph (7)(A)1.I.(V) that requires the utility to provide all meter readings used to calculate the payments made by the electric utility to any owner of a renewable energy resource for the purchase of energy and/or Renewable Energy Credits (“RECs”). In its requests for waivers, the Companies state that they cannot provide the meter readings because the “...meter reading information is not provided by the vendors that the Companies purchase Renewable Energy Credits from.”

5. Meter readings provide the energy output of the renewable resource that is then used to calculate the amount of payment due from the electric utility to the owner of the facility. Reporting meter reading information is necessary because it ensures that Missouri customers are receiving the energy and/or Renewable Energy Credits (RECs) they pay for in rates, but also verifies the number of RECs produced from the use of the renewable energy resource.

6. As part of the Companies’ *2012 Annual Renewable Energy Standard Compliance Report*, the Companies provided the “total metering” amounts used to calculate the amount of payments made from the electric utility to the owner of the renewable energy resource. Missouri’s other regulated electric utilities have historically filed similar information to comply with this provision of the Commission’s Rule, or have been granted limited waivers in regard to reporting customer-generator and REC aggregator information.

7. Staff understands that the Companies are willing to supplement in each of the above-stated cases its *2013 Compliance Report* with invoices, or other similar

documentation, showing the amount of energy output purchased--along with the rate paid for the output--for each renewable energy resource not owned by the Companies.

8. Staff also requests that when the Companies file the supplemental information that they also specify whether they still seek a waiver of Rule 4 CSR 240-20.100(7) (A)1.I.(V), and if so, include the type of energy/REC purchases the waiver is to address and the good cause to support any Commission decision to grant the waiver.

9. Once the Companies file the requested information, Staff will be able to fully review, and provide the Commission with a recommendation on, the Companies' request.

WHEREFORE, Staff files this response to the Companies' requests for waivers and respectfully requests that the Commission allow Staff to supplement this response with a recommendation when the Companies supplement each *Compliance Report*, but no later than May 30, 2014.

Respectfully submitted,

/s/ Akayla J Jones
Akayla J. Jones
Legal Counsel
Missouri Bar No. 64941

Jennifer Hernandez
Senior Staff Counsel
Missouri Bar No. 59814

Attorneys for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 526- 6036 (Telephone)
(573) 751-9285 (Fax)
akayla.jones@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically on this 25th day of April 2014, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Akayla J. Jones