

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

In the Matter of the Eighth Prudence Review)
of Costs Subject to the Commission-Approved)
Fuel Adjustment Clause of KCP&L Greater)
Missouri Operations Company)

Case No. EO-2019-

STAFF’S NOTICE OF START OF EIGHTH PRUDENCE REVIEW

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its Notice of Start of Eighth Prudence Review, respectfully states to the Missouri Public Service Commission (“Commission”):

1. The tariff of KCP&L Greater Missouri Operations Company (“GMO”)¹ provides that as part of its fuel adjustment clause (“FAC”) there “shall be prudence reviews of costs” that “shall occur no less frequently than at 18-month intervals.”² This tracks the language of both Commission Rule 4 CSR 240-20.090(7) and § 386.266.4(4) RSMo as supplemented.

2. Staff has conducted seven previous prudence reviews of GMO’s FAC as summarized below:

¹ Formerly Aquila, Inc.

² KCP&L Greater Missouri Operations Company Tariff P.S.C. MO. No. 1, 1st Revised Sheet No. 126.2 (Applicable to Service Provided November 8, 2016 through February 21, 2017) and Original Tariff Sheet 127.11 (Applicable to Service Provided February 22, 2017 and Thereafter).

Review Number	File Number	Review Period
1	EO-2009-0115	June 1, 2007 through May 31, 2008
2	EO-2010-0167	June 1, 2008 through May 31, 2009
3	EO-2011-0390	June 1, 2009 through November 30, 2010
4	EO-2013-0325	December 1, 2010 through May 31, 2012
5	EO-2014-0242	June 1, 2012 through November 30, 2013
6	EO-2016-0053	December 1, 2013 through May 31, 2015
7	EO-2017-0232	June 1, 2015 through November 30, 2016

3. In each of GMO's general electric rate cases where the Commission has approved GMO to have or continue to have a FAC, the accumulation periods have remained the same—two six-month accumulation periods each year, June-November and December-May.

4. Staff plans to conduct a prudence review of the costs and revenues associated with GMO's FAC for the period December 1, 2016 through May 31, 2018.

5. The following table identifies GMO's Commission-approved FAC tariff sheets which were applicable for electric service provided to its customers during the review period December 1, 2016 through May 31, 2018:

December 1, 2016 through February 21, 2017	February 22, 2017 through May 31, 2018
3 rd Revised Sheet No. 124 3 rd Revised Sheet No. 125 3 rd Revised Sheet No. 126 1 st Revised Sheet No. 126.1 1 st Revised Sheet No. 126.2 14 th Revised Sheet No. 127	2nd Revised Sheet No. 127.1 2nd Revised Sheet No. 127.2 2nd Revised Sheet No. 127.3 2nd Revised Sheet No. 127.4 6th Revised Sheet No. 127.5 2nd Revised Sheet No. 127.6 2nd Revised Sheet No. 127.7 2nd Revised Sheet No. 127.8 2nd Revised Sheet No. 127.9 4th Revised Sheet No. 127.10 Original Sheet No. 127.11 3rd Revised Sheet No. 127.12

6. Rule 4 CSR 240-20.090(7)(B), in part, provides: “The Staff shall file notice within ten (10) days of starting its prudence audit.” It also establishes the following schedule by which certain events are to take place based on the date the Staff starts its prudence review:

Time from start of Staff prudence review to event	Event
Within 180 days	Submission of Staff recommendation to Commission regarding Staff’s examination and analysis
Within 190 days	Request for hearing
Within 210 days	Commission Order, if no hearing requested

7. Staff initiated its eighth prudence review of the costs and revenues associated with GMO’s Commission-approved FAC on September 4, 2018. Staff plans to file its recommendation to the Commission regarding the Staff’s examination and analysis in this case by February 28, 2019.

8. Staff may change its examination approach during this review, and in future prudence reviews as well, based on the particular circumstances existing at the time of the review. The Staff's Energy Resources Department is responsible for this prudence review. The Staff plans to include in its recommendation the following:

Section 1 - Standard of Prudence

A. The standard requires documentation and includes other Commission principles as appropriate, such as the Commission's Affiliate Transactions Rules, which also require documentation.

Section - 2 Review Scope

- A. Presently Known Areas To Review
 - 1. GMO's Total Book Costs of Fuel Consumed in GMO's Generating Units
 - 2. Costs Associated with GMO's Fuel Hedging Program
 - 3. Purchased Power Energy Charges, Including Applicable Transmission Fees
 - 4. Southwest Power Pool Variable Costs
 - 5. Emission Allowance Costs and Revenues
 - 6. Off System Sales
- B. Tests/Investigations to Address/Discover Other Significant Items Impacting Fuel and Purchased Power Cost Recovery Amount
 - 1. Comparison of Base Fuel Components and Amounts to Claimed Cost Components and Amounts
 - 2. Plant Outages

3. Fuel, Freight and Transportation / Purchase Power
Contracts

WHEREFORE, the Staff of the Missouri Public Service Commission hereby provides notice that it started its eighth prudence review of the costs and revenues associated with GMO's Commission-approved fuel adjustment clause on September 4, 2018, for the review period of December 1, 2016, through May 31, 2018, and that it plans to file its recommendation regarding the Staff's examination and analysis in this case by February 28, 2019.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 7th day of September, 2018.

/s/ Robert S. Berlin