BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of KCP&L Greater Missouri Operations |) | |
|--|---|-----------------------|
| Company's Submission of Its 2018 Renewable |) | File No. EO-2018-0291 |
| Energy Standard Compliance Plan |) | |

STAFF REPORT ON KCP&L GREATER MISSOURI OPERATIONS COMPANY'S 2018 RENEWABLE ENERGY STANDARD COMPLIANCE PLAN

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and submits its *Staff Report On KCP&L Greater Missouri Energy Company's 2018 Renewable Energy Standard Compliance Plan* to the Missouri Public Service Commission (Commission). In further support, Staff states:

- 1. On April 13, 2018, KCP&L Greater Missouri Operations Company ("GMO" or "Company") filed its 2018 Renewable Energy Standard (RES) Compliance Plan (Plan) for calendar years 2018 through 2020 as required by rule.¹
 - 2. Commission rule 4 CSR 240-20.100(8) states:

...Each electric utility shall file an RES compliance report no later than April 15 to report on the status of both its compliance with the RES [renewable energy standard] and its compliance plan as described in this section for the most recently completed calendar year...

- 3. Rule 4 CSR 240-20.100(8)(B) specifies what information the utility must provide in its annual RES Compliance Plan.
 - 4. Rule 4 CSR 240-20.100(8)(D) provides that:

The staff of the commission shall examine each electric utility's annual RES compliance report and RES compliance plan and file a report of its review with the commission within forty-five (45) days of the filing of the annual RES compliance report and RES compliance plan with the

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¹ That same day GMO also filed its 2017 Renewable Energy Standard Compliance Report for calendar year 2017 in docket EO-2018-0289.

commission. The staff's report shall identify any deficiencies in the electric utility's compliance with the RES.

- 5. On April 16, 2018, the Commission issued its *Order Directing Notice* directing the Staff to file a report of its review of GMO's 2018 RES Compliance Plan, and any interested parties to file comments, no later than May 29, 2018.
- 6. Staff has conducted its review of GMO's 2018 RES Compliance Plan for calendar years 2018-2020and is of the opinion GMO has met the minimum requirements of 4 CSR 240-20.100(8)(B). Staff's report is contained in its *Memorandum*, attached hereto as Attachment A and incorporated herein.
- 7. Staff notes the Commission has granted intervention in this matter to Missouri Division of Energy.
- 8. The Staff is unaware of any other case currently pending before the Commission that will affect or be affected by a decision in this file other than File No. EO-2018-0289 opened by GMO when it filed its 2017 RES Compliance Report.

WHEREFORE, the Staff submits its report for the Commission's information and consideration regarding GMO's 2018 RES Compliance Plan for calendar years 2018 - 2020.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

| | I hereby | certify | that | а | true | and | correct | copy | of | the | foregoing | was | serve | d by |
|--------|--------------|----------|-------|-----|--------------|--------|----------|--------|------|------|------------|--------|----------------------|------|
| electi | onic mail, | or First | Clas | s l | Jnite | d Stat | tes Post | al Mai | l, p | osta | ge prepaid | , on t | his 29 th | day |
| of Ma | ıy, 2018, to | all cou | ınsel | of | recor | d. | | | | | | | | |

/s/ Robert S. Berlin