

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

In the Matter of KCP&L Greater Missouri)	
Operations Company's Application for)	<u>File No. EO-2014-0151</u>
Authority to Establish a Renewable)	Tariff Tracking No. YE-2015-0204
Energy Standard Rate Adjustment Mechanism)	

STAFF RECOMMENDATION TO APPROVE TARIFF SHEETS

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and hereby submits Staff's recommendation for the Commission to approve the tariff sheets filed on November 6, 2014¹ by Kansas City Power & Light Greater Missouri Operations Company ("GMO") in accordance with the Commission's November 5th *Order Approving Partial Stipulation and Agreement, Rejecting Tariff, and Establishing Procedural Schedule*. In support thereof, Staff states as follows:

1. On October 20, GMO, the Office of Public Counsel, Earth Island Institute d/b/a Renew Missouri, and Staff filed a *Non-Unanimous Partial Stipulation and Agreement* with the Commission.

2. On November 5, the Commission issued its *Order Approving Partial Stipulation and Agreement, Rejecting Tariff, and Establishing Procedural Schedule* in which it authorized GMO to file tariff sheets in compliance with the order and a motion for expedited treatment.

3. On November 6, GMO filed a *Motion for Expedited Treatment and Approval of Compliance Tariff Filing* requesting that the Commission accept the tariff

¹All dates herein refer to calendar year 2014 unless otherwise stated.

sheets filed with its motion (P.S.C. MO. No. 1, assigned Tariff Tracking No. YE-2015-0204) as the tariff sheets complying with the Commission's Order.

4. On November 7, the Commission issued its *Order Directing Filing of Staff Recommendation Regarding Compliance Tariff* directing Staff to file a recommendation as to whether the tariff sheets are in compliance with the Order and whether the motion for expedited treatment should be granted no later than November 17.

5. Accordingly, Staff files this recommendation, and the attached *Memorandum* prepared by Ms. Sarah Kliethermes, Regulatory Economist III within the Economic Analysis Unit of the Commission. Staff has reviewed the tariff sheets filed by GMO with its November 6th Motion. It is Staff's opinion that the tariff sheets filed by GMO are in compliance with the Commission's *Order Approving Partial Stipulation and Agreement, Rejecting Tariff, and Establishing Procedural Schedule*, and therefore should be approved. It must be noted, and as furthered explained in the attached *Memorandum*, during review of the compliance tariffs Staff discovered certain minor typographical errors on both the currently effective tariff sheets and the compliance tariff sheets. These errors do not change Staff's recommendation for approval as they are not substantive, however Staff recommends that these errors be corrected in a separate filing made by GMO after December 7th, 2014, but before January 7, 2015.

6. Staff believes that good cause exists for the Commission to approve these tariff sheets on less than thirty days' notice because the requested December 1, 2014 effective date of the tariff sheets complies with the effective date permitted in the Commission's Order.

7. Staff has verified that GMO has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, for the reasons stated above, Staff recommends the Commission issue an Order approving the tariff sheets as listed in Staff's *Memorandum* and assigned Tracking No. YE-2015-0204, to become effective on December 1, 2014.

Respectfully submitted,

/s/ Akayla J. Jones

Akayla J. Jones
Legal Counsel
Missouri Bar No. 64941

Attorney 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 copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 17th day of November, 2014.

/s/ Akayla J. Jones

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EO-2014-0151

FROM: Sarah Kliethermes, Regulatory Economist III

/s/ Michael Scheperle 11/17/14
Manager, Economic Analysis / Date

/s/ Akayla J. Jones 11/17/14
Staff Counsel's Office / Date

SUBJECT: Staff Recommendation to Enter an Order Approving to Take Effect on Less Than 30 Days' Notice Tariff Sheets Filed to Comply with the Commission's *Order Approving Partial Stipulation and Agreement, Rejecting Tariff and Approval of Compliance Tariff Filing*, and Suggestion to File Additional Tariff Sheets to Correct Certain Typographical Errors in Currently Effective Tariff

DATE: November 14, 2014

BACKGROUND

On October 20, 2014, KCP&L Greater Missouri Operations Company ("GMO"), the Office of Public Counsel, Earth Island Institute d/b/a Renew Missouri, and Staff filed a Non-Unanimous Partial Stipulation and Agreement ("Agreement"). After reviewing the Agreement, the Commission independently found and concluded that the Agreement is a reasonable resolution of the issues addressed, and the Commission approved the Agreement by its *Order Approving Partial Stipulation and Agreement, Rejecting Tariff and Approval of Compliance Tariff Filing*, effective November 15, 2014.

The Agreement stated that the signatories agreed that the Commission should approve the RESRAM tariff appended to the Agreement in exemplar form as Exhibit 1 as soon as reasonably practicable, but in any event no later than December 1, 2014.

On November 6, 2014, GMO submitted a Letter of Transmittal concerning the issuance of tariff sheets contained in Tracking Number YE-2015-0204. Concurrent with this compliance tariff sheet filing, GMO filed its *Motion for Expedited Treatment and Approval of Compliance Tariff Filing*, requesting "that the Commission take action to approve these compliance tariff sheets effective December 1, 2014." GMO further stated that there was good cause for approval of those tariff sheets on less than 30 days' notice in that those compliance tariff sheets serve to implement an agreement among most of the parties to this proceeding that was opposed by no party to this proceeding, has been approved by the Commission and which will enable GMO to begin recovering a portion of the substantial costs it has expended to comply with Missouri's renewable energy standard.

STAFF RECOMMENDATION

Staff has reviewed these compliance tariff sheets and GMO's allegation of good cause for these tariff sheets to take effect on less than 30 days' notice, and recommends the Commission enter an order that

the following tariff sheets take effect December 1, 2014:

P.S.C. MO. No. 1

7th Revised Sheet No. 18, canceling 6th Revised Sheet No. 18
7th Revised Sheet No. 19, canceling 6th Revised Sheet No. 19
7th Revised Sheet No. 21, canceling 6th Revised Sheet No. 21
7th Revised Sheet No. 22, canceling 6th Revised Sheet No. 22
7th Revised Sheet No. 23, canceling 6th Revised Sheet No. 23
7th Revised Sheet No. 24, canceling 6th Revised Sheet No. 24
7th Revised Sheet No. 25, canceling 6th Revised Sheet No. 25
7th Revised Sheet No. 28, canceling 6th Revised Sheet No. 28
3rd Revised Sheet No. 30, canceling 2nd Revised Sheet No. 30
4th Revised Sheet No. 33, canceling 3rd Revised Sheet No. 33
2nd Revised Sheet No. 36, canceling 1st Revised Sheet No. 36
7th Revised Sheet No. 42, canceling 6th Revised Sheet No. 42
2nd Revised Sheet No. 46, canceling 1st Revised Sheet No. 46
2nd Revised Sheet No. 49, canceling 1st Revised Sheet No. 49
7th Revised Sheet No. 50, canceling 6th Revised Sheet No. 50
6th Revised Sheet No. 52, canceling 5th Revised Sheet No. 52
4th Revised Sheet No. 55, canceling 3rd Revised Sheet No. 55
2nd Revised Sheet No. 58, canceling 1st Revised Sheet No. 58
7th Revised Sheet No. 61, canceling 6th Revised Sheet No. 61
6th Revised Sheet No. 66, canceling 5th Revised Sheet No. 66
3rd Revised Sheet No. 69, canceling 2nd Revised Sheet No. 69
6th Revised Sheet No. 71, canceling 5th Revised Sheet No. 71
2nd Revised Sheet No. 94, canceling 1st Revised Sheet No. 94
7th Revised Sheet No. 95, canceling 6th Revised Sheet No. 95
6th Revised Sheet No. 103, canceling 5th Revised Sheet No. 103
6th Revised Sheet No. 104, canceling 5th Revised Sheet No. 104
1st Revised Sheet No. R-63.26, canceling Original Sheet No. R-63.26
Original Sheet No. 137
Original Sheet No. 137.1
Original Sheet No. 137.2
Original Sheet No. 137.3

SUGGESTIONS CONCERNING TYPOGRAPHICAL ERRORS

In its review of these compliance tariff sheets, Staff observed the existence of certain typographical errors on both the currently effective tariff sheets and the compliance tariff sheets. Staff provides recommendations to address these typographical errors, if the Commission determines it is appropriate to address these errors at this time.

Both the currently effective Large Power Service P.S.C. MO. No. 1, 6th Revised Sheet No. 61, and the filed sheet, P.S.C. MO. No. 1, 7th Revised Sheet No. 61 contain an apparent typographical error

under the heading “Web Usage Service,” indicating on this tariff sheet applicable to MPS territory that “Customers served under this LPS rate schedule are eligible for basic monthly web usage service....” Staff recommends that this error referring to the LPS rate schedule in an MPS tariff sheet be corrected in a separate filing made after December 7th, 2014, but before January 7, 2015.

Neither the currently effective MPS General Service Time-of-Day P.S.C. MO. No. 1, 2nd Revised Sheet No. 69, and the filed sheet, P.S.C. MO. No. 1, 3rd Revised Sheet No. 69 state that the “Demand-Side Program Investment Mechanism Rider” is applicable to that schedule’s service, although the “MEEIA DSIM Charge is plainly included as a rate element on the immediately preceding MPS General Service Time-of-Day P.S.C. MO. No. 1, 5th Revised Sheet No. 68. Staff recommends that this error excluding the MEEIA DSIM Charge from the applicable riders and charges listed be corrected in a separate filing made after December 7th, 2014, but before January 7, 2015.

Both the currently effective MPS Thermal Energy Storage Pilot Program P.S.C. MO. No. 1, 5th Revised Sheet No. 71, and the filed sheet, P.S.C. MO. No. 1, 6th Revised Sheet No. 71 contain an apparent typographical error, in that the punctuation associated with the first sentence under the heading “Rules and Regulations” appears on a subsequent typeline. Staff recommends that this error be corrected in a separate filing made after December 7th, 2014, but before January 7, 2015.

Staff has verified that GMO has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

