

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

In the Matter of KCP&L Greater Missouri Operations)
Company's Submission of Its 2015 Renewable Energy) **File No. EO-2016-0281**
Standard Compliance Report)

In the Matter of KCP&L Greater Missouri Operations)
Company's Submission of Its 2016 Renewable Energy) **File No. EO-2016-0283**
Standard Compliance Plan)

**MISSOURI DIVISION OF ENERGY'S RESPONSE TO THE COMMENTS OF RENEW
MISSOURI**

COMES NOW the Missouri Division of Energy ("DE"), by and through the undersigned counsel, and for its response to the *Comments of Renew Missouri* ("Renew MO") on the 2016 Renewable Energy Standard Compliance Plans ("RES Plans") of the above-captioned utility, states:

1. On April 15, 2016, KCP&L Greater Missouri Operations Company ("GMO") filed its RES Plan. Renew MO filed comments on the RES Plan on May 27. On June 1, the Public Service Commission ("Commission") established time for parties to respond to comments filed by parties on the RES Plan. DE is responding to the comments of Renew MO in this filing.

2. Broadly, Renew MO raised two issues in its comments: 1) that the retail rate impact ("RRI") calculations were not consistent with the Commission's rules at 4 CSR 240-20.100, and 2) the RRI calculation methodologies were not consistent among the various electric utilities. DE is responding to the latter issue.

3. Renew MO states, "While Ameren and KCP&L [including GMO] have limited themselves to 1% of their current revenue requirement, Empire has attempted to perform the comparison spelled out in Section (5) of the Commission's rule. Given these differing approaches, the Commission should step in to clarify what exactly is required by its rule at 4

CSR 240-20.100(5)(B).” DE concurs with Renew MO that additional guidance from the Commission is warranted on the methodology and format to be used for calculating the 1% RRI. Additional guidance from the Commission will save utilities and stakeholders significant time and money by avoiding costly complaint processes and by standardizing procedures for future compliance years.

WHEREFORE, DE recommends that the Commission provide additional guidance to clarify what exactly is required by its rule at 4 CSR 240-20.100(5)(B) in terms of the methodology and format to be used for calculating the 1% RRI.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been emailed to the certified service list this 13th day of June, 2016.

/s/ Alexander Antal