

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

In the Matter of the KCP&L Greater Missouri Operations)	
Company Request for Authority to Implement Rate)	<u>Case No. ER-2019-0413</u>
Adjustments Required by 4 CSR 240-20.090(8) ¹)	
And the Company's Approved Fuel and Purchased)	
Power Cost Recovery Mechanism)	
)	
In the Matter of the Application of KCP&L)	<u>Case No. ER-2019-0414</u>
Greater Missouri Operations Company, Containing)	
Its Semi-Annual Fuel Adjustment Clause True-Up)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its *Staff Recommendation*, respectfully states as follows:

1. On August 15, 2019, the Missouri Public Service Commission ("Commission") issued its *Order Rejecting Fuel Adjustment Clause Tariff, Scheduling a Procedural Conference, and Directing the Filing of a Revised Tariff*. Staff, KCP&L Greater Missouri Operations Company ("GMO"), and the Office of the Public Counsel ("OPC")(collectively, "the Parties") were ordered to hold a procedural conference on September 5, 2019, and to file a proposed procedural schedule by September 12, 2019.

2. On September 12, 2019, GMO, following discussions with Staff and OPC, filed a *Response to Order Directing Filing* in which it informed the Commission that the Parties had reached a resolution, and that it would be unnecessary to establish a procedural schedule.

3. On September 13, 2019, the Commission issued its Order Directing Filing, instructing Staff to file a recommendation concerning the disposition of ER-2019-0413 and ER-2019-0414, as well as address the status of Tariff Revision YE-2020-0033, by September 23, 2019.

¹ Staff would like to note that the rule is now found at 20 CSR 4240-20.090(8) now the Commission rules fall under the Department of Commerce and Insurance.

DISPOSITION OF ER-2019-0413 AND ER-2019-0414

4. As a result of discussions among GMO, Staff, and OPC, the Parties have reached the following agreements concerning the Auxiliary Power issues which, if adopted, would not make it necessary to hear at this time. The Parties have reached the following agreement:

a. The Parties agree that it is unnecessary to try the issues related to Auxiliary Power in this proceeding since this issue has been tried as a part of Case No. ER-2019-0067. The Company will use the allocation method established in the order in that case when it becomes final and unappealable and will make an adjustment to the next accumulation period accordingly.

5. As for the remaining issue concerning the proposed adjustments to the Sibley fuel transfers and sales issues, the Parties have agreed that GMO will not seek to recover the \$185,857 at issue in Accumulation Period 24 or any other future accumulation period of its Fuel Adjustment Clause.

6. This agreement resolves only the limited issue for Accumulation Period 24 as presented by this case.

7. It is Staff's recommendation that the Commission issue an order approving the agreement disposing of the issues in the above-captioned cases.

STATUS OF TARIFF REVISION YE-2020-0033

8. GMO filed Tariff Revision YE-2020-0033 to implement interim adjusted fuel adjustment rates, removing the cost of auxiliary power GMO used for its steam operations at Lake Road station, and removing the costs of coal and propane at the retired Sibley generation facility, on August 21, 2019.

9. On August 23, 2019 Staff reviewed Tariff Revision YE-2020-0033 and the accompanying workpapers, verifying that the disputed amounts were removed, and recommended that the Commission issue an order that allowed Tariff Revision YE-2020-0033 to take effect by operation of law on September 1, 2019.

10. The Commission issued an order approving Tariff Revision YE-2020-0033 on August 26, 2019, and took effect by operation of law on September 1, 2019.

11. With the amounts at issue removed and resolved in the above captioned cases, Staff stands by its recommendation and has no changes to Tariff Revision YE-2020-0033.

WHEREFORE, the Staff respectfully requests that the Commission issue an order accepting the agreement filed by KCP&L Greater Missouri Operations Company on September 12, 2019, maintain Tariff Revision YE-2020-0033, and to grant any such further relief that is deemed just in these circumstances.

Respectfully submitted,

/s/ Travis J. Pringle

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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 parties and/or counsel of record on this 23rd day of September, 2019.

/s/ Travis J. Pringle