

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

In the Matter of the Application of KCP&L)	
Greater Missouri Operations Company)	<u>File No. ER-2019-0414</u>
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 recommendation respectfully states:

1. On June 28, 2019, KCP&L Greater Missouri Operations Company (“GMO”) filed an application concerning its twenty-first true-up filing for Recovery Period 21(“RP21”),¹ as allowed by Commission Rule 4 CSR 240-20.090(9), in order to remedy an over-collection of \$197,557 from its customers.

2. Rule 4 CSR 240-20.090(9)(D) requires the Commission’s Staff to examine and analyze the information GMO has submitted and to submit a recommendation to the Commission not later than 30 days after GMO made its filing—in this case, no later than July 28, 2019.

3. As explained in Staff’s *Memorandum*, attached hereto as Appendix A and incorporated herein by reference, Staff recommends the Commission approve GMO’s twenty-first true-up filing for RP21, during which GMO over-collected \$197,557 from its customers.

4. Staff reviewed and analyzed the direct testimony, supporting schedules and work papers of GMO witness Lisa A. Starkebaum. Staff has determined that

¹ March 1, 2018 through February 28, 2019.

GMO's calculations for the true-up amount for RP21 are correct. The over-collected amount will be returned to the customers as it will be included in GMO's proposed changes to its current period fuel adjustment rates in its semi-annual Fuel Adjustment Clause ("FAC") filing in File No. ER-2019-0413 for Accumulation Period 24.²

5. Staff has verified that GMO has filed its 2018 annual report and is not delinquent on any assessment. GMO is current on its submission of its Surveillance Monitoring reports as required in 4 CSR 240-20.090(6), and its periodic reports as required by 4 CSR 240-20.090(5). With the exception of GMO's proposed changes to its current annual fuel adjustment rates in its semi-annual FAC filing in File No. ER-2019-0413, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, Staff submits its analysis and recommends that the Commission approve GMO's twenty-first true-up filing for RP21 during which GMO over-collected \$197,557 from its customers.

Respectfully Submitted,

/s/ Travis J. Pringle

Travis J. Pringle
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Missouri Public Service Commission
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² December 1, 2018 through May 31, 2019.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 26th day of July, 2019, to all counsel of record.

/s/ Travis J. Pringle

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. ER-2019-0414
KCP&L Greater Missouri Operations Company

FROM: Brooke Mastrogiannis, Utility Regulatory Auditor IV
Lisa Wildhaber, Utility Regulatory Auditor III
Cynthia M. Tandy, Utility Regulatory Auditor I

DATE: /s/ Brad J. Fortson 07/26/2019 /s/ Travis Pringle 7/26/2019
Energy Resources Department / Date Staff Counsel Department / Date

SUBJECT: Staff's Analysis Of and Recommendation Concerning KCP&L Greater Missouri Operations Company's Twenty-First Fuel Adjustment Clause True-up Filing Under the Provisions in 4 CSR 240-20.090(9).

DATE: July 26, 2019

Recommendation

Staff recommends the Commission approve KCP&L Greater Missouri Operations Company's ("GMO") twenty-first true-up filing for Recovery Period 21 ("RP21") during which GMO over-collected \$197,557 from its customers.

Discussion

On June 28, 2019, GMO filed with the Commission, along with direct testimony and supporting schedules of GMO witness Lisa A. Starkebaum, its twenty-first fuel adjustment clause ("FAC") true-up filing under the provisions in 4 CSR 240-20.090(9). According to GMO's true-up filing, in the aggregate for RP21 (March 1, 2018 through February 28, 2019), GMO over-collected from its customers \$197,557 which followed its Accumulation Period 21 (June 1, 2017 through November 30, 2017).

The Missouri Public Service Commission Staff ("Staff") reviewed the direct testimony of GMO witness Lisa A. Starkebaum, the supporting schedules GMO provided with GMO's application in this case, and the monthly information GMO submitted to the Commission in accordance with 4 CSR 240-20.090(9).

Staff Review

Based on its review and analysis of the information GMO filed and submitted for RP21, Staff has determined that GMO's calculations for the true-up amounts for RP21, including the calculation of monthly interest, are correct.

Therefore, Staff recommends the Commission approve GMO's twenty-first true-up filing for RP21 during which GMO over-collected \$197,557 from its customers. The over-collected amount will be returned to the customers as it will be included in GMO's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2019-0413, filed on June 28, 2019, for Accumulation Period 24 (December 1, 2018 through May 31, 2019).

Staff has verified that GMO has filed its 2018 Annual Report and is not delinquent on any assessment. GMO is current on its submission of its Surveillance Monitoring reports as required by 4 CSR 240-20.090(6), and its monthly reports as required by 4 CSR 240-20.090(5). With the exception of GMO's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2019-0413, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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In the Matter of the Application of KCP&L)
Greater Missouri Operations Company) Case No. ER-2019-0414
Containing Its Semi-Annual Fuel Adjustment)
Clause True-Up)

AFFIDAVIT OF BROOKE MASTROGIANNIS

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

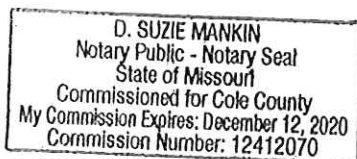
COMES NOW BROOKE MASTROGIANNIS and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation* in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

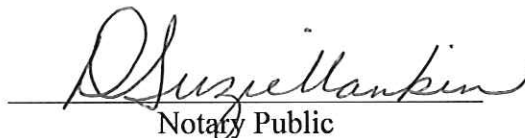
Further the Affiant sayeth not.


BROOKE MASTROGIANNIS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 26th day of July 2019.




Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company)
Containing Its Semi-Annual Fuel Adjustment)
Clause True-Up)


Case No. ER-2019-0414

AFFIDAVIT OF LISA WILDHABER

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

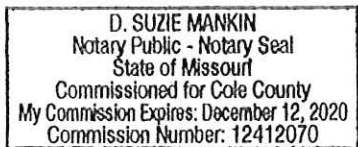
COMES NOW LISA WILDHABER and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation* in Memorandum form; and that the same is true and correct according to her best knowledge and belief.


Further the Affiant sayeth not.


LISA WILDHABER

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 26th day of July 2019.




Notary Public

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OF THE STATE OF MISSOURI

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company) Case No. ER-2019-0414
Containing Its Semi-Annual Fuel Adjustment)
Clause True-Up)

AFFIDAVIT OF CYNTHIA M. TANDY

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

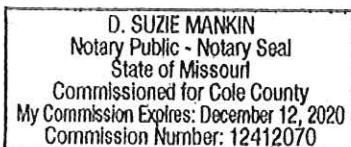
COMES NOW CYNTHIA M. TANDY and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation* in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

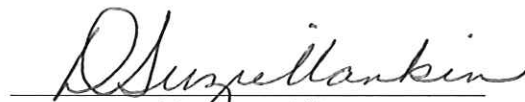
Further the Affiant sayeth not.


CYNTHIA M. TANDY

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 26th day of July 2019.




Notary Public