

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

In The Matter of KCP&L Greater Missouri)	
Operations Company's Residential Lighting and)	<u>File No. ET-2015-0076</u>
Appliance Program Tariff)	Tariff No. JE-2015-0125

**STAFF'S RECOMMENDATION REGARDING EXPEDITED TREATMENT
OF GMO'S REVISED TARIFF SHEET**

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and hereby submits this *Staff's Recommendation Regarding Expedited Treatment of GMO's Revised Tariff Sheet* recommending denial of GMO's request for expedited treatment of its revised tariff sheet (Tariff Tracking No. JE-2015-0125). In support hereof, Staff states the following:

1. On September 22, 2014¹, KCP&L Greater Missouri Operations Company ("GMO") filed with the Commission a revised tariff sheet (Tariff Tracking No. JE-2015-0125), which proposed a change to the existing Residential Lighting and Appliance Program. That same day, GMO filed a *Motion for Expedited Treatment* requesting that the effective date of the revised tariff sheet be October 2 instead of October 22.

2. On September 23, the Commission in its *Order Establishing Time To Respond To Motion For Expedited Approval Of Tariff* ordered that any party wishing to respond to GMO's motion do so by September 29.

3. In its September 22 *Motion for Expedited Treatment*, GMO stated: "The tariff revision consists of the removal of two measures from the "Eligible Lighting and Appliance Measures" section: (1) Purchase Energy Star Labeled Refrigerator and

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

(2) Install Programmable Thermostat. These two measures didn't pass the Total Resource Cost screening in the 2013 Evaluation, Measurement and Verification Report prepared by Navigant Consulting, Inc.” However, Staff verified with GMO that the Navigant report does not contain any total resource cost (“TRC”) test calculations for the two measures and the Navigant report does not contain any recommendations concerning the two measures. Thus, on September 29, Staff filed its *Motion for Extension of Time to File Staff Response* and on that same date the Commission issued its *Order Extending Time To Respond To Motion For Expedited Approval Of Tariff*, granting Staff until October 8 to provide its response.

4. GMO has not yet provided Staff with acceptable TRC test calculations for the two measures and due to the absence of key GMO personnel, is not expected to do so before October 8. Because Staff is unable to prepare its recommendation at this time, Staff is unable to support GMO's request for expedited treatment.

5. Staff continues to work with GMO to understand the cost effectiveness of the two measures so that Staff can make an informed recommendation concerning the revised tariff sheet, which has an effective date of October 22. Staff plans to file its recommendation not later than October 14.

WHEREFORE, Staff files *Staff's Recommendation Regarding Expedited Treatment of GMO's Revised Tariff Sheet* for the Commission's information and consideration and respectfully recommends the Commission issue an order in this case denying GMO's request for expedited treatment of its revised tariff sheet filed in Tariff Tracking No. JE-2015-0125.

Respectfully submitted,

/s/ Akayla J. Jones

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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 7th day of October, 2014.

/s/ Akayla J. Jones