

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

In the Matter of KCP&L Greater Missouri)
Operations Company's Application for) **File No. EO-2014-0151**
Authority to Establish a Renewable)
Energy Standard Rate Adjustment Mechanism)

**STAFF'S REPLY TO RENEW MISSOURI'S BRIEF
REGARDING COMMISSION'S AUTHORITY TO GRANT RELIEF**

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and for its *Staff's Reply to Renew Missouri's Brief Regarding Commission's Authority to Grant Relief*, states that the Staff joins in KCP&L Greater Missouri Operations Company's ("GMO") Reply Brief to Renew Missouri, concurring with the legal arguments set forth therein, and joining GMO's Motion For Expedited Decision. Further in support, Staff states:

While the Staff is cognizant of the issues raised by Renew Missouri in this proceeding, it is apparent that Renew Missouri is seeking an impermissible advisory opinion from the Commission on factual issues not related to the relief GMO was granted by the Commission when it approved the Non-Unanimous Partial Stipulation And Agreement ("Agreement") in which the signatory parties, including Renew Missouri, agreed that the Commission should approve a Renewable Energy Standard Rate Adjustment Mechanism ("RESRAM") pursuant to Section 393.1030 and 4 CSR 240-20.100(6). Staff suggests that the issues carved out by Renew Missouri in paragraph 6 of the Agreement are more appropriately addressed in either a rulemaking proceeding or in the next general rate case proceeding when all relevant factors regarding RES

costs and savings may be reviewed and addressed in the setting of new base rates and charges.

WHEREFORE, Staff prays the Commission accept its *Staff's Reply to Renew Missouri's Brief Regarding Commission's Authority to Grant Relief* joining with the rationale set forth by GMO in its Reply, and respectfully requests that the Commission decline Renew Missouri's request for relief, cancel the remainder of the procedural schedule, including evidentiary hearings, and close this file.

Respectfully submitted,

/s/ Robert S. Berlin

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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 12th day of December, 2014.

/s/ Robert S. Berlin