

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File, Case No. EO-2008-0415, KCP&L Greater Missouri Operations Company

FROM: Matthew Barnes, Utility Regulatory Auditor IV

DATE: /s/ John Rogers 1-22-2010                      /s/ Sarah Kliethermes 1-22-2010  
Energy Department / Date                      Staff Counsel's Office / Date

SUBJECT: Staff's Analysis and Recommendation in Response to KCP&L Greater Missouri Operations Company's Second Annual Fuel Adjustment Clause True-up Filing under the provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: January 22, 2010

On December 23, 2009, KCP&L Greater Missouri Operations Company (GMO) filed with the Commission in the form of direct testimony and supporting schedules by Tim M. Rush, its second annual true-up filing under the provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5). According to GMO's true-up filing, GMO under-collected \$988,989 from its customers in the former Aquila Networks-MPS territory (MPS) and under-collected \$175,393 from its customers in the former Aquila Networks-L&P territory (L&P) during the second recovery period (September 1, 2008 through August 31, 2009) that followed its second accumulation period (December 1, 2007 through May 31, 2008).

The Missouri Public Service Commission Staff (Staff) examined the analysis GMO provided with its application in this case, the monthly information GMO provided to Staff, and the GMO responses to data requests in this case and in the prudence audit case (Case No. EO-2009-0115). Staff also reviewed GMO's calculation of the first true-up period corrections (Case No. EO-2009-0431) (March 1, 2008 through February 28, 2009) that GMO completed to correct the prior accumulated amounts (June 1, 2007 through November 30, 2007) that were not properly rolled into the outstanding balance to calculate interest and the reduction of expense related to a prior period billing and agrees that these corrections are correct.

Based on its examination and analysis of information filed by GMO, the Staff recommends the Commission approve GMO's second true-up filing for the second recovery period (September 1, 2008 through August 31, 2009) where GMO under-collected \$988,989 from its customers in MPS and under-collected \$175,393 from its customers in L&P. The under-collected amounts are included in GMO's current semi-annual Fuel Adjustment Clause filing Case No. EO-2010-0191 made on December 23, 2009 for the fifth accumulation period (June 1, 2009 through November 30, 2009).

Staff has verified that GMO has filed its 2008 annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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

In the Matter of Aquila, Inc., d/b/a     )  
Aquila Networks - MPS and Aquila     )  
Networks - L&P for Authority to     )  
Implement Rate Adjustments Required     )  
by 4 CSR 240-20.090(4) and the     )  
Company's Approved Fuel and     )  
Purchased Power Cost Recovery     )  
Mechanism     )

Case No. EO-2008-0415

**AFFIDAVIT OF MATTHEW J. BARNES**

STATE OF MISSOURI     )  
                                   ) ss  
COUNTY OF COLE     )


Matthew J. Barnes, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.

  
Matthew J. Barnes

Subscribed and sworn to before me this 21<sup>st</sup> day of January, 2010.



SUSAN L. SUNDERMEYER  
My Commission Expires  
September 21, 2010  
Callaway County  
Commission #06942086

  
Notary Public