

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

In the Matter of Kansas City Power & Light Company's Filing for Approval of Changes to Certain MEEIA Cycle 1 Demand-Side Programs	)	<b><u>File No. ET-2016-0145</u></b>
	)	Tariff No. JE-2016-0151
In the Matter of KCP&L Greater Missouri Operations Company's Filing for Approval of Changes to Certain MEEIA Cycle 1 Demand-Side Programs	)	<b><u>File No. ET-2016-0146</u></b>
	)	Tariff No. JE-2016-0152

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and hereby files its Staff Recommendation recommending approval of the above-captioned tariff filings and motions for expedited approval by Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") (collectively "Companies"). In support thereof, the Staff states:

1. On December 11, 2015, KCP&L and GMO filed revised tariff sheets to extend certain MEEIA<sup>1</sup> Cycle 1 programs<sup>2</sup> beyond the programs' current term of December 31, 2015 in order to allow maintenance of those programs and to prevent any gaps in availability of those programs before the same MEEIA Cycle 2 programs go into effect as anticipated April 1. The purpose of these tariff sheet filings is to freeze the programs so that the Companies can maintain them and not have to stop programs and then restart them a few months later for Cycle 2. As of this filing no party has objected to any of these programs as a result of the *Non-Unanimous Stipulation and*

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<sup>1</sup> Missouri Energy Efficiency Investment Act ("MEEIA"), Sect. 393.1075 RSMo 2013 as supplemented.

<sup>2</sup> KCP&L programs include: Business Energy Analyzer, Home Energy Report-Pilot, Income-Eligible Home Energy Report-Pilot, Programmable Thermostat, and Home Energy Analyzer. GMO programs include: Energy Optimizer, Home Energy Analyzer, Business Energy Analyzer, and Residential Energy Reports.

*Agreement Resolving MEEIA Cycle 1 Transition* filed in Case No's EO-2014-0095 (KCP&L MEEIA Cycle 1) and EO-2012-0009 (GMO MEEIA Cycle 1)<sup>3</sup>. No party has objected to these programs continuing in Cycle 2 as a result of the *Non-Unanimous Stipulation And Agreement Resolving MEEIA Filings* agreed to and filed by the signatories on November 23, 2015 in Case No.'s EO-2015-0240 (KCP&L MEEIA Cycle 2) and EO-2015-0241 (GMO MEEIA Cycle 2).

2. In addition to the above-captioned tariff sheet filings, the Companies filed motions for expedited approval so that the tariff sheets may go into effect on less than thirty days' notice on January 1, 2016 instead of a thirty day effective date of January 11, 2016. Staff has reviewed the tariff sheet filings and motions for expedited approval and, for reasons explained in Staff's Memorandum attached as Appendix A, recommends the Commission approve the tariff sheet filings to become effective on January 1, 2016. Staff agrees that good cause exists for the Commission to expedite approval of these tariff sheets in the interest of administrative efficiency and because their approval would allow the programs to be maintained without the disruption of stopping and then restarting them.

**WHEREFORE**, for the reasons discussed above and further explained in Staff's Memorandum, Staff respectfully requests that the Commission approve Tariff Filing No.'s JE-2016-0151 and JE-2016-0152 as those tariff sheets are listed on page 2 of Staff's Memorandum and grant the Companies' motions for expedited approval so that these tariff sheets may become effective January 1, 2016.

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<sup>3</sup> Paragraph 7 in both filed stipulations states: Recovery of all Cycle 1 program costs for the above listed programs will be achieved through the Cycle 1 DSIM [Demand-Side Investment Mechanism] subject to prudence review for Cycle 1 DSIM costs.

Respectfully submitted,

**/s/ Robert S. Berlin**

Robert S. Berlin

Deputy Counsel

Missouri Bar No. 51709

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

Phone (573) 526-7779

Facsimile (573) 751-9285

[bob.berlin@psc.mo.gov](mailto:bob.berlin@psc.mo.gov)

### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 17<sup>th</sup> day of December, 2015 to all counsel of record in this proceeding.

**/s/ Robert S. Berlin**

## MEMORANDUM

TO: Missouri Public Service Commission Official Case Files  
File No. ET-2016-0145, Tariff Tracking No. JE-2016-0151  
Kansas City Power & Light Company  
File No. ET-2016-0146, Tariff Tracking No. JE-2016-0152  
KCP&L Greater Missouri Operations Company

FROM: Brad J. Fortson, Regulatory Economist III

/s/John A. Rogers 12/17/2016                      /s/Robert S. Berlin 12/17/2016  
Manager Energy Resources Department      Staff Counsel Department

SUBJECT: Expedited consideration and approval of tariff sheets on less than thirty days' notice.

DATE: December 17, 2015

On December 11, 2015, Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") (collectively "Companies"), filed with the Commission revised tariff sheets to extend certain of their MEEIA Cycle 1 programs<sup>1</sup> beyond the programs' current term of December 31, 2015 in order to prevent any gaps in availability of those programs before the same MEEIA Cycle 2 programs go into effect.<sup>2</sup> The revised tariff sheets carry an effective date of January 10, 2016, but the Companies filed motions for expedited treatment asking the Commission to approve the revised tariff sheets to take effect, on less than thirty (30) days' notice, on January 1, 2016.

The Companies' recovery of program costs after December 31, 2015 for the effected programs is dependent upon approval of the Non-Unanimous Stipulation and Agreement Resolving MEEIA Cycle 1 Transition Period filed on December 11, 2015 in Case Nos. EO-2014-0095<sup>3</sup> and EO-2012-0009<sup>4</sup> or other authorization by the Commission.

### **Staff Recommendation**

The Commission Staff ("Staff") has reviewed the filed tariff sheet revisions of KCP&L and GMO and recommends the Commission approve the following revised tariff sheets as filed on December 11, 2015 to go into effect for service, on less than thirty days' notice, on the requested

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1 Programs for KCP&L include: Business Energy Analyzer, Home Energy Report – Pilot, Income-Eligible Home Energy Report – Pilot, Programmable Thermostat, and Home Energy Analyzer. Programs for GMO include: Energy Optimizer, Home Energy Analyzer, Business Energy Analyzer, and Residential Energy Reports.

2 KCP&L's MEEIA Cycle 2 is in File No. EO-2015-0240. GMO's MEEIA Cycle 2 is in File No. EO-2015-0241.

3 Paragraph 7 of the KCP&L Non-Unanimous Stipulation and Agreement Resolving MEEIA Cycle 1 Transition Period filed on December 11, 2015 in Case No. EO-2014-0095 states: Recovery of all Cycle 1 program costs for the above listed programs will be achieved through the Cycle 1 DSIM subject to prudence review for Cycle 1 DSIM costs.

4 Paragraph 7 of the GMO Non-Unanimous Stipulation and Agreement Resolving MEEIA Cycle 1 Transition Period filed on December 11, 2015 in Case No. EO-2012-0009 states: Recovery of all Cycle 1 program costs for the above listed programs will be achieved through the Cycle 1 DSIM subject to prudence review for Cycle 1 DSIM costs.

effective date January 1, 2016:

**KCP&L**

P.S.C. MO. No. 2 Sheet No. 1.78

First Revised Sheet No. 1.78 Cancelling Original Sheet No. 1.78

P.S.C. MO. No. 2 Sheet Nos. 1.88 – 1.89

First Revised Sheet No. 1.88 Cancelling Original Sheet No. 1.88

First Revised Sheet No. 1.89 Cancelling Original Sheet No. 1.89

P.S.C. MO. No. 2 Sheet Nos. 1.93 – 1.95

First Revised Sheet No. 1.93 Cancelling Original Sheet No. 1.93

First Revised Sheet No. 1.94 Cancelling Original Sheet No. 1.94

First Revised Sheet No. 1.95 Cancelling Original Sheet No. 1.95

**GMO**

P.S.C. MO. No. 1 Sheet Nos. R-63.09 – R-63.11

First Revised Sheet No. R-63.09 Cancelling Original Sheet No. R-63.09

First Revised Sheet No. R-63.10 Cancelling Original Sheet No. R-63.10

First Revised Sheet No. R-63.11 Cancelling Original Sheet No. R-63.11

P.S.C. MO. No. 1 Sheet Nos. R-63.15 – R-63.16

First Revised Sheet No. R-63.15 Cancelling Original Sheet No. R-63.15

First Revised Sheet No. R-63.16 Cancelling Original Sheet No. R-63.16

P.S.C. MO. No. 1 Sheet Nos. R-64.03 – R-64.04

Third Revised Sheet No. R-64.03 Cancelling Second Revised Sheet No. R-64.03

Third Revised Sheet No. R-64.04 Cancelling Second Revised Sheet No. R-64.04

Because this filing was made on less than thirty days' notice, an order by the Commission is necessary to approve the Companies' tariff sheet revisions to be effective on January 1, 2016. Staff agrees with the Companies' motions for expedited approval that good cause exists to make these tariff sheets effective on less than thirty days' notice since doing so will allow the Companies to maintain certain MEEIA Cycle 1 programs until the Cycle 2 programs begin, which is expected to be on April 1, 2016.

Staff has verified that the Companies have filed their annual report and are 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**

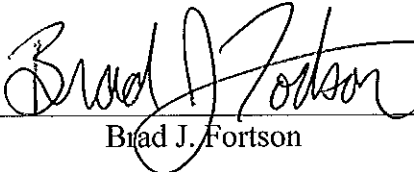
In the Matter of Kansas City Power & Light )  
Company's Filing for Approval of ) Case No. ET-2016-0145  
Changes to Certain MEEIA Cycle 1 )  
Demand-Side Programs )

In the Matter of KCP&L Greater Missouri )  
Operations Company's Filing for Approval of ) Case No. ET-2016-0146  
Changes to Certain MEEIA Cycle 1 )  
Demand-Side Programs )

**AFFIDAVIT OF BRAD J. FORTSON**


STATE OF MISSOURI     )  
  ) ss  
COUNTY OF COLE     )

Brad J. Fortson, 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.

  
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Brad J. Fortson

Subscribed and sworn to before me this 17<sup>th</sup> day of December, 2015.

DIANNA L. VAUGHT  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: June 28, 2019  
Commission Number: 15207377

  
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Notary Public