

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

In the Matter of the Joint Application from )  
Kansas City Power & Light Company and )  
KCP&L Greater Missouri Operations )  
Company for a Variance from Selected )  
Provisions of the Commission's Rules )  
Regarding Net Metering )

**Case No. EE-2019-0056**

**STAFF'S RECOMMENDATIONS REGARDING  
KANSAS CITY POWER & LIGHT COMPANY'S AND  
KCP&L GREATER MISSOURI OPERATIONS COMPANY'S  
REQUESTED VARIANCES**

**COMES NOW** the Staff of the Public Service Commission of the State of Missouri and states to the Commission that it recommends the tariff sheets filed by Kansas City Power & Light Company and KCP&L Greater Missouri Operations ("KCPL and GMO") on August 27, 2018 be approved to become effective October 15, 2018.

1. On August 27, 2018, KCPL and GMO filed their Joint Application for a variance from selected provisions of 4 CSR 240-20.065 ("Request for Variances"). On August 28, 2018, the Commission ordered Staff to file its Recommendation no later than September 24, 2018.

2. Staff has reviewed KCPL and GMO's Joint Application and as a result of its review states that it supports the variance request. Details of the variance requests are discussed in Staff's Memorandum.

**WHEREFORE**, for reasons stated above and in Staff's Memorandum, Staff recommends to the Commission that it:

- Approve the following tariff sheets filed on August 27, 2018, bearing an effective date of October 15, 2018:

**P.S.C. MO. No. 7**

Seventh Revised Sheet No. 34 canceling Sixth Revised Sheet No. 34  
Fifth Revised Sheet No. 34A canceling Fourth Revised Sheet No. 34A  
Sixth Revised Sheet No. 34B canceling Fifth Revised Sheet No. 34B  
Sixth Revised Sheet No. 34E canceling Fifth Revised Sheet No. 34E  
Fourth Revised Sheet No. 34F canceling Third Revised Sheet No. 34F  
Third Revised Sheet No. 34G canceling Second Revised Sheet No. 34G  
Third Revised Sheet No. 34H canceling Second Revised Sheet No. 34H  
Third Revised Sheet No. 34I canceling Second Revised Sheet No. 34I  
Third Revised Sheet No. 34J canceling Second Revised Sheet No. 34J  
Third Revised Sheet No. 34Q canceling Second Revised Sheet No. 34Q  
Second Revised Sheet No. 34R canceling First Revised Sheet No. 34R  
Second Revised Sheet No. 34S canceling First Revised Sheet No. 34S  
Fourth Revised Sheet No. 46 canceling Third Revised Sheet No. 46  
Fifth Revised Sheet No. 46A canceling Fourth Revised Sheet No. 46A  
Second Revised Sheet No. 46B canceling First Revised Sheet No. 46B  
PSC Mo. No. 7 Original Sheet 46C  
PSC Mo. No. 7 Original Sheet 46D  
PSC Mo. No. 7 Original Sheet 46E

**P.S.C. MO. No. 1**

Eighth Revised Sheet No. 110 canceling Seventh Revised Sheet No. 110  
Fourth Revised Sheet No. 110.1 canceling Third Revised Sheet No. 110.1  
Eighth Revised Sheet No. 111 canceling Seventh Revised Sheet No. 111  
Seventh Revised Sheet No. 114 canceling Sixth Revised Sheet No. 114  
Seventh Revised Sheet No. 115 canceling Sixth Revised Sheet No. 115  
Fifth Revised Sheet No. 116 canceling Fourth Revised Sheet No. 116  
Seventh Revised Sheet No. 117 canceling Sixth Revised Sheet No. 117  
Seventh Revised Sheet No. 118 canceling Sixth Revised Sheet No. 118  
Seventh Revised Sheet No. 119 canceling Sixth Revised Sheet No. 119  
Fourth Revised Sheet No. 119.2 canceling Third Revised Sheet No. 119.2  
Fourth Revised Sheet No. 119.7 canceling Third Revised Sheet No. 119.7  
Third Revised Sheet No. 119.8 canceling Second Revised Sheet No. 119.8  
Third Revised Sheet No. 119.9 canceling Second Revised Sheet No. 119.9  
Fourth Revised Sheet No. R-62.19 canceling Third Revised Sheet No. R-62.19  
Third Revised Sheet No. R-62.20 canceling Third Revised Sheet No. R-62.20  
First Revised Sheet No. R-62.21 canceling Third Revised Sheet No. R-62.21  
First Revised Sheet No. R-62.22 canceling Third Revised Sheet No. R-62.22  
Original Sheet No. R-62.23  
Original Sheet No. R-62.24  
Original Sheet No. R-62.25

Respectfully Submitted,

**/s/ Casi Aslin**

Casi Aslin

Missouri Bar No. 67934

Attorney for the Staff of the

Missouri Public Service Commission

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Attorney for Staff of the

Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all counsel of record this 24<sup>th</sup> day of September, 2018.

**/s/ Casi Aslin**

## **MEMORANDUM**

**TO:** Missouri Public Service Commission Official Case File  
Case No. EE-2019-0056, File No. JE-2019-0027 and JE-2019-0028  
Kansas City Power & Light Company and KCPL Greater Missouri Operations  
Joint Application for a Variance from the Provisions of 4 CSR 240-20.065  
Regarding Net Metering and associated Tariff Sheets

**FROM:** Claire M. Eubanks, PE, Engineering Analysis

/s/ Daniel I. Beck, PE Date 09-24-18  
Engineering Analysis / Date

/s/ Nicole Mers Date 09-24-18  
Staff Counsel's Office / Date

**SUBJECT:** Staff Recommendation to approve Joint Application for a Variance from the Provisions of 4 CSR 240-20.065 Regarding Net Metering and associated tariff Sheets

**DATE:** September 24, 2018

### **OVERVIEW**

Staff has reviewed the Kansas City Power & Light Company (“KCP&L”) and KCPL Greater Missouri Operations Company (“GMO”) (collectively “Applicants”) Joint Application for a Variance from the Provisions of 4 CSR 240-20.065 Regarding Net Metering and associated tariff sheets filed on August 27, 2018. As a result of passage of Section 393.1670 RSMo, KCP&L and GMO have requested to remove the solar rebate application sections from the “Interconnection Application/Agreement for Net Metering Systems with Capacity of 100 kW or Less.” The solar rebate tariff sheets related to Section 393.1670 RSMo. were also filed in JE-2019-0027 and JE-2019-0028.

### **DISCUSSION**

**Variance:**

The Applicants request a variance from 4 CSR 240-20.065 to remove the solar rebate application (Section H and I of the Interconnection Application/ Agreement for Net Metering Systems with Capacity of 100 kW or Less) from the net-metering application. Staff supports the variance request for the following reasons:

- Customers receiving a solar rebate under Section 393.1670 may interconnect under the Net Metering tariff or the Company's Qualifying Facility tariff. This is related to the size limitation for offering solar rebates to non-residential customers under Section 393.1670 RSMo (150 kW) in comparison to the size limitation of the Net Metering and Easy Connection Act in Section 386.890 RSMo (100 kW).
- There are potential efficiencies to be gained, in terms of the Applicants' administration of the programs, from separating the solar rebate application from the net metering application.

**Net Metering Interconnection Application Agreement:**

The primary revision to the Net Metering Interconnection Application Agreement is to separate the Solar Rebate application from the Net Metering application; as discussed above, Staff is supportive of the revision to improve the administration of these programs. Other revisions to the Net Metering Interconnection Application Agreement include clarifying that kilowatt sizing is in reference to DC rather than AC, requiring grid support inverters, and allowing customers to apply via an online portal.

Staff has reviewed the Company's online application portal. Commission rule 4 CSR 240-20.065(9)(A)1A. requires the interconnection application on the utility's website to be substantially the same as the interconnection form included in the rule. Staff will note that the net metering tariff (including application) is linked to the online portal such that the customer can easily review the effective tariff. The fields on the online portal are generally the same as the rule form, though some items were not included such as additional contact fields (mailing, service address, emergency contact).

**Solar Rebate Tariff:**

The proposed changes to the solar rebate tariffs incorporates tariff sheets<sup>1</sup> allowing for the Applicants to accept solar rebate applications related to Senate Bill 564 (Section 393.1670 RSMo). The Applicants have completed payments of solar rebates under Section 393.1030; therefore, the proposed tariff sheets replace the previous solar rebate program.

KCP&L's tariff titled "Solar Photovoltaic Rebate Program – Schedule SR 393.1670 RSMo (2019-2023)" and GMO's tariff titled "Rules and Regulations Electric 9.18 Solar Photovoltaic Rebate Program" include an open pool of funding up to \$8 million per company rather than a yearly cap.

Additionally, each company has reserved \$500,000 for customers who qualify under the Business Social Service Program. The Business Social Service Program is for non-profit businesses that receive general electric service and are primarily used for low-income public social services<sup>2</sup>. Any funds reserved for the Business Social Service Program will be made available to all customers after June 30, 2020.

The availability requirements of the new tariff are similar to the previously offered solar rebates (Section 393.1030), except that there is a requirement that customers install a grid support inverter.

**Tariff:**

Staff recommends that the Commission approve the following tariff sheets, as filed on August 27, 2018, to go into effect for service on and after October 15, 2018, the requested effective date:

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<sup>1</sup> PSC MO. No. 7 Sheets 46 through 46E for Kansas City Power and Light Company; PSC MO. No. 1 Sheets R-62.19 through R-62.25 for KCP&L Greater Missouri Operations.

<sup>2</sup> Such as food banks, food pantries, soup kitchens, homeless shelters, employment services, worker training, job banks, and child care or otherwise determined by the Company.

P.S.C. MO. No. 7

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First Revised Sheet No. R-62.22 canceling Third Revised Sheet No. R-62.22  
Original Sheet No. R-62.23  
Original Sheet No. R-62.24  
Original Sheet No. R-62.25

Staff has verified that KCP&L and GMO have filed their annual reports and are not delinquent on any assessments.

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**OF THE STATE OF MISSOURI**

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From Kansas City Power & Light Company        )  
and KCP&L Greater Missouri Operations         )  
Company For A Variance From Selected            )  
Provisions Of The Commission's Rules            )  
Regarding Net Metering                                )

Case No. EE-2019-0056

**AFFIDAVIT OF CLAIRE M. EUBANKS, PE**

STATE OF MISSOURI        )  
                                      )  
COUNTY OF COLE         )        ss.

COMES NOW CLAIRE M. EUBANKS, PE 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.

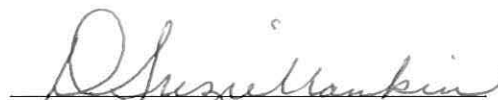
Further the Affiant sayeth not.

  
CLAIRE M. EUBANKS, PE

**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 24<sup>th</sup> day of September 2018.

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: December 12, 2020  
Commission Number: 12412070

  
Notary Public