

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

In the Matter of Kansas City Power & Light)
Company's Application for Approval of)
Demand-Side Programs and for Authority to) **File No. EO-2014-0095**
Establish a Demand-Side Programs)
Investment Mechanism

STAFF RECOMMENDATION TO APPROVE TARIFF SHEETS

COMES NOW Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and hereby submits Staff's recommendation for the Commission to approve the tariff sheets issued by Kansas City Power & Light Company ("KCP&L") on June 6, 2014,¹ with an effective date of July 6, and assigned Tariff Tracking Nos. YE-2014-0532 and YE-2014-0533. In support hereof, Staff states as follows:

1. On May 27, KCP&L, along with other parties to this case, filed a *Non-Unanimous Stipulation and Agreement Resolving Kansas City Power & Light Company's MEEIA Filing* ("*Stipulation and Agreement*"). The *Stipulation and Agreement* requested the Commission's approval of 12 demand-side programs pursuant to the Missouri Energy Efficiency Investment Act ("MEEIA"). The *Stipulation and Agreement* also requested the Commission authorize KCP&L to establish a demand-side programs investment mechanism ("DSIM") to recover MEEIA Programs' costs, KCP&L's Throughput Disincentive Net Shared Benefits ("TD-NSB") Share that is intended to recover estimated lost margin revenues, and any earned Performance Incentive Award.

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

Staff and KCP&L also agreed in the *Stipulation and Agreement* to support the use of a rider for MEEIA purposes only.

2. On June 5, the Commission issued its *Order Approving Stipulation and Agreement* and ordered that KCP&L may file new tariff sheets consistent with the approved *Stipulation and Agreement*.

3. On June 6, KCP&L issued tariff sheets for its Commission approved MEEIA programs and approved DSIM with the effective date of July 6. After discussion with Staff, KCP&L filed a substitute tariff sheet for Sheet No. TOC-1 on June 26.

4. Although not specifically ordered to do so, Staff files this recommendation, and the attached *Memorandum* prepared by Ms. Tammy Huber, Utility Policy Analyst II within the Energy Resource Analysis Unit of the Commission. It is Staff's opinion that the tariff sheets listed in Staff's *Memorandum* are in compliance with the Commission's *Order Approving Stipulation and Agreement*.

WHEREFORE, Staff recommends the Commission issue an Order approving the compliance tariff sheets as listed in Staff's *Memorandum* and assigned Tracking Nos. YE-2014-0532 and YE-2014-0533, to become effective on July 6, 2014.

Respectfully submitted,

/s/ Jennifer Hernandez

Jennifer Hernandez
Senior Staff Counsel
Missouri Bar No. 59814

Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
Phone (573) 751-8706
Facsimile (573) 751-9285
jennifer.hernandez@psc.mo.gov

Attorney for Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 27th day of June, 2014 to all counsel of record in this proceeding.

/s/ Jennifer Hernandez

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EO-2014-0095, Tariff Tracking Nos. YE-2014-0532 and YE-2014-0533
Kansas City Power & Light Company

FROM: Tammy Huber, Utility Policy Analyst II

/s/ John Rogers 06/27/2014

Energy Resource Analysis Unit / Date

/s/ Jennifer Hernandez 06/27/2014

Staff Counsel's Office / Date

SUBJECT: Staff Recommendation to Approve Kansas City Power & Light Company's Tariff Sheets Filed to Comply with the Commission's Order Approving Stipulation and Agreement

DATE: June 27, 2014

Summary

On May 27, 2014, Kansas City Power & Light Company ("KCP&L") along with other parties to Case No. EO-2014-0095, Kansas City Power & Light Company's Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand Side Programs Investment Mechanism, filed a *Non-Unanimous Stipulation and Agreement Resolving Kansas City Power & Light Company's MEEIA Filing* ("*Stipulation and Agreement*"). The *Stipulation and Agreement* resolved all issues in the case amongst the signatories and requested the Commission's approval of 12 demand-side programs pursuant to the Missouri Energy Efficiency Investment Act ("MEEIA"). The *Stipulation and Agreement* also requested the Commission authorize KCP&L to establish a demand-side programs investment mechanism ("DSIM") to recover MEEIA Programs' costs, KCP&L's Throughput Disincentive Net Shared Benefits ("TD-NSB") Share that is intended to recover lost margin revenues, and any earned Performance Incentive Award. Staff and KCP&L agreed to support the use of a rider for MEEIA purposes only. On June 5, 2014, the Missouri Public Service Commission ("Commission") issued its *Order Approving Stipulation and Agreement*.

On June 6, 2014, KCP&L filed tariff sheets for its approved demand-side programs and approved DSIM to comply with the *Order Approving Stipulation and Agreement*. The filed tariff sheets were assigned Tariff Tracking Nos. YE-2014-0532 and YE-2014-0533, and all filed tariff sheets have an issue date of June 6, 2014 and an effective date of July 6, 2014. At Staff's

request, KCP&L filed a substitute tariff sheet on June 26, 2014, to correct information on the Table of Contents, Thirteenth Revised Sheet NO. TOC-1, Cancelling Twelfth Revised Sheet No. TOC-1.

In response to paragraph 6 of the *Stipulation and Agreement* the Company will begin recovery through a DSIM Rider in the August 2014 billing or as soon as practical thereafter.

Thirteenth Revised Sheet No. TOC-1

The Thirteenth Revised Sheet No. TOC-1, Canceling Twelfth Revised Sheet No. TOC-1, as submitted on June 6, 2014, omitted several sheet numbers with the schedule title of "Reserved for Future Use". On June 26, 2014 Staff advised KCP&L personnel to file a substitute tariff sheet to include all sheet numbers including the DSIM sheet number on the table of contents tariff sheet. KCP&L submitted its substitute tariff sheet P.S.C. MO. No. 7 Thirteenth Revised Sheet No. TOC-1, Cancelling Twelfth Revised Sheet No. TOC-1 on June 26, 2014.

Staff Recommendation

MPSC Staff reviewed the tariff sheets KCP&L filed on June 6, 2014, and as substituted on June 26, 2014, and has determined that KCP&L tariff sheets comply with the Non-Unanimous Stipulation and Agreement in Case No. EO-2014-0095. Accordingly, staff recommends that the Commission approve the following tariff sheets, so that each tariff sheet becomes effective July 6, 2014.

P.S.C. MO. No. 7

Thirteenth Revised Sheet NO. TOC-1, Cancelling Twelfth Revised Sheet No. TOC-1
Second Revised Sheet No. 5C, Cancelling First Revised Sheet No. 5C
Third Revised Sheet No. 6, Cancelling Second Revised Sheet No. 6
Sixth Revised Sheet No. 8A, Cancelling Fifth Revised Sheet No. 8A
Third Revised Sheet No. 9E, Cancelling Second Revised Sheet No. 9E
Third Revised Sheet No. 10E, Cancelling Second Revised Sheet No. 10E
Third Revised Sheet No. 11E, Cancelling Second Revised Sheet No. 11E
Third Revised Sheet No. 14E, Cancelling Second Revised Sheet No. 14E
Fourth Revised Sheet No. 17D, Cancelling Third Revised Sheet No. 17D
Fourth Revised Sheet No. 18E, Cancelling Third Revised Sheet No. 18E
Fourth Revised Sheet No. 19D, Cancelling Third Revised Sheet No. 19D
First Revised Sheet No. 43, Cancelling Original Sheet No. 43
First Revised Sheet No. 43A, Cancelling Original Sheet No. 43A
Second Revised Sheet No. 43D, Cancelling First Revised Sheet No. 43D
Fifth Revised Sheet No. 43E, Cancelling Fourth Revised Sheet No. 43E

Second Revised Sheet No. 43E.1, Cancelling First Revised Sheet No. 43E.1
Second Revised Sheet No. 43F, Cancelling First Revised Sheet No. 43F
Second Revised Sheet No. 43G, Cancelling First Revised Sheet No. 43G
Fifth Revised Sheet No. 43H, Cancelling Fourth Revised Sheet No. 43H
Fifth Revised Sheet No. 43I, Cancelling Fourth Revised Sheet No. 43I
Third Revised Sheet No. 43I.1, Cancelling Second Revised Sheet No. 43I.1
First Revised Sheet No. 43J, Cancelling Original Sheet No. 43J
First Revised Sheet No. 43K, Cancelling Original Sheet No. 43K
Second Revised Sheet No. 43L, Cancelling First Revised Sheet No. 43L
Second Revised Sheet No. 43M, Cancelling First Revised Sheet No. 43M
First Revised Sheet No. 43N, Cancelling Original Sheet No. 43N
First Revised Sheet No. 43O, Cancelling Original Sheet No. 43O
Second Revised Sheet No. 43P, Cancelling First Revised Sheet No. 43P
First Revised Sheet No. 43Q, Cancelling Original Sheet No. 43Q
First Revised Sheet No. 43R, Cancelling Original Sheet No. 43R
First Revised Sheet No. 43S, Cancelling Original Sheet No. 43S
Second Revised Sheet No. 43T, Cancelling First Revised Sheet No. 43T
Second Revised Sheet No. 43U, Cancelling First Revised Sheet No. 43U
Second Revised Sheet No. 43V, Cancelling First Revised Sheet No. 43V
Second Revised Sheet No. 43W, Cancelling First Revised Sheet No. 43W
Second Revised Sheet No. 43X, Cancelling First Revised Sheet No. 43X
Second Revised Sheet No. 43Y, Cancelling First Revised Sheet No. 43Y
First Revised Sheet No. 43AI, Cancelling Original Sheet No. 43AI
First Revised Sheet No. 43AJ, Cancelling Original Sheet No. 43AJ
Second Revised Sheet No. 49, Cancelling First Revised Sheet No. 49
Original Sheet No. 49A
Original Sheet No. 49B
Original Sheet No. 49C
Original Sheet No. 49D
Original Sheet No. 49E
Sixth Revised Sheet No. 1.04B, Cancelling Fifth Revised Sheet No. 1.04B
Original Sheet No. 1.72
Original Sheet No. 1.73
Original Sheet No. 1.74
Original Sheet No. 1.75
Original Sheet No. 1.76
Original Sheet No. 1.77
Original Sheet No. 1.78
Original Sheet No. 1.79
Original Sheet No. 1.80

Original Sheet No. 1.81
Original Sheet No. 1.82
Original Sheet No. 1.83
Original Sheet No. 1.84
Original Sheet No. 1.85
Original Sheet No. 1.86
Original Sheet No. 1.87
Original Sheet No. 1.88
Original Sheet No. 1.89
Original Sheet No. 1.90
Original Sheet No. 1.91
Original Sheet No. 1.92
Original Sheet No. 1.93
Original Sheet No. 1.94
Original Sheet No. 1.95

Staff has verified that KCP&L has filed its 2013 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.

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Case No. EO-2014-0095

AFFIDAVIT OF TAMMY HUBER

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Tammy Huber of lawful age, on oath states: that she 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 her; that she has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of her knowledge and belief.



Tammy Huber

Subscribed and sworn to before me this 27th day of June, 2014.

LAURA BLOCH
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 21, 2015
Commission Number: 11203914



Notary Public