

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

In the Matter of KCP&L Greater Missouri)	
Operations Company's Annual RESRAM)	<u>File No. ET-2017-0097</u>
Tariff Filing)	Tariff No. YE-2017-0067

**STAFF RECOMMENDATION TO APPROVE REVISED TARIFF SHEETS
AND TO GRANT MOTION FOR EXPEDITED TREATMENT**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, files this *Staff Report and Recommendation to Approve Revised Tariff Sheets* (“Report”) with the Missouri Public Service Commission (“Commission”), and respectfully states:

1. On September 30, 2016, KCP&L Greater Missouri Operations Company (“GMO”) filed with the Commission its *Revised Tariff*, wherein GMO seeks to revise its tariffs to adjust its Renewable Energy Standard Rate Adjustment Mechanism (RESRAM) revenue requirement and rate.

2. On October 19, 2016, the Commission directed Staff to review GMO’s filings and file a recommendation to the Commission no later than November 9, 2016.

3. Staff reviewed all the information submitted in this case file to date and conducted an investigation. The *Staff Recommendation* is attached hereto as Appendix A.

4. As a result of discussions with Staff concerning the rates contained therein, GMO withdrew its tariff sheet and submitted a new tariff sheet on November 8, 2016. GMO also filed a motion for expedited treatment, such that the tariff sheet may take effect December 1, 2016, consistent with the operative tariff dates

contemplated in Case No. EO-2014-0151, establishing GMO's RESRAM.

5. Staff recommends the Commission approval of GMO's tariff sheet to be effective December 1, 2016.

6. If GMO's motion to make the proposed tariff sheet effective on less than thirty days' notice is granted, GMO's proposed tariff sheet would have an effective date of December 1, 2016, which is less than 30 days from November 8, 2016, the date GMO filed it. Section 393.140(11), RSMo, requires good cause for purposes of allowing tariff sheets to take effect on less than thirty days' notice. The proposed tariff sheet would take effect on December 1, 2016, which is consistent with the operative tariff dates contemplated in Case No. EO-2014-0151 wherein the Commission authorized GMO's RESRAM. GMO originally filed a tariff sheet on September 30, 2016, to change its RESRAM charge effective December 1, 2016; however, in response to Staff input GMO withdrew that tariff sheet and on November 8, 2016, filed the tariff sheet that is now before the Commission. GMO's November 8, 2016, filing provides 23 days' notice. In Staff's opinion these circumstances constitute "good cause" to make GMO's proposed tariff sheet effective on less than thirty days' notice; therefore, Staff supports GMO's motion for expedited treatment.

WHEREFORE, Staff requests the Commission issue an Order that finds (1) good cause shown to make it effective on less than thirty days' notice and (2) approves the following proposed tariff sheet, issued November 8, 2016, to become effective on December 8, 2016, as KCP&L Greater Missouri Operations Company request:

P.S.C. MO. No. 1

2nd Revised Sheet No. 137.3, Canceling 1st Revised Sheet No. 137.3

Respectfully submitted,

/s/ Hampton Williams

Wm. Hampton Williams

Assistant Staff Counsel

Missouri Bar No. 65633

Attorney for the Staff of the

Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record on this 9th day of November, 2016.

/s/ Hampton Williams

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. ET-2017-0097 and Tariff Tracking No. YE-2017-0067

FROM: Sarah Kliethermes, Regulatory Economist III

/s/ Robin Kliethermes / 11-9-2016
Manager, Tariff and Rate Design/ Date

/s/ Hampton Williams / 11-9-2016
Staff Counsel's Office / Date

SUBJECT: Staff Recommendation to Enter an Order Approving to Take Effect on Less Than 30 Days' Notice Tariff Sheet Filed to Adjust the Renewable Energy Standard Rate Adjustment Mechanism of KCP&L Greater Missouri Operations Company

DATE: November 9, 2016

BACKGROUND

On September 30, 2016, KCP&L Greater Missouri Operations Company ("GMO") submitted a letter and tariff designed to adjust its renewable energy standard rate adjustment mechanism ("RESRAM") pursuant to Commission Rule 4 CSR 240-20.100. The submitted tariff bore an effective date of December 1, 2016 and was filed in Tariff Tracking No. JE-2017-0049.

On November 8, 2016, following discussions with Staff concerning the rates contained therein, GMO withdrew its tariff in Tracking No. JE-2017-0049 and submitted a tariff sheet in Tracking No. YE-2017-0067 bearing an issue date of November 8, 2016, and an effective date of December 8, 2016. GMO also filed a motion for expedited treatment, such that the tariff sheet may take effect December 1, 2016, consistent with the operative tariff dates contemplated in Case No. EO-2014-0151, establishing GMO's RESRAM.

STAFF RECOMMENDATION

Staff has reviewed the corrected tariff sheet and GMO's allegation of good cause for this tariff sheet to take effect on less than 30 days' notice, and recommends the Commission enter an order that the following tariff sheet take effect December 1, 2016:

P.S.C. MO. No. 1

2nd Revised Sheet No. 137.3, canceling 1st Revised Sheet No. 137.3

Staff has verified that GMO has filed its 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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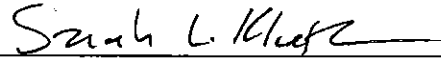
In The Matter of KCP&L Greater Missouri)
Operations Company's Annual RESRAM) **File No. ET-2017-0097**
Tariff Filing)

AFFIDAVIT

State of Missouri)
) ss.
County of Cole)

COMES NOW Sarah L. Kliethermes and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached Staff Memorandum; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.



Sarah L. Kliethermes

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 9th day of November, 2016.

JESSICA LUEBBERT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: February 19, 2019
Commission Number: 15633434



NOTARY PUBLIC