

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light)
Company's Submission of Its 2018 Renewable) **File No. EO-2019-0315**
Energy Standard Compliance Report)

In the Matter of KCP&L Greater Missouri Operations)
Company's Submission of Its 2018 Renewable) **File No. EO-2019-0316**
Energy Standard Compliance Report)

ORDER DIRECTING COMPANY FILING

Issue Date: June 24, 2019

Effective Date: June 24, 2019

On April 15, 2019, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (jointly "the Company") filed the above-captioned pleadings. The Staff of the Commission found no deficiencies in the Reports. The Office of the Public Counsel, however, believes the Reports fail to comply with the pertinent Commission rules.

To assist the Commission in how to proceed, the Commission will order the Company to respond to the following questions¹:

1. Does the Company agree or disagree that the RES Report is required to include all costs associate with its renewable generation? If the Company disagrees, please detail why.
2. Why is it appropriate to include the retail electric sales supplied by the "favorable economic" PPAs in the total sales from renewable energy resources in Commission Rule 4 CSR 240-20.100(8)(A)(1)C and exclude costs associated with the "favorable economics" PPAs from the actual calendar year retail rate impact calculation?

¹ If parties believe their responses contain confidential material, they shall file both confidential and public versions of their responses.

3. Cite to any statute, rule or Commission order authorizing the exclusion of “favorable economic” renewable energy resources from the actual calendar year retail rate impact calculation.
4. Is it appropriate to calculate the actual calendar year retail rate impact from Commission Rule 4 CSR 240-20.100(8)(A)(1)P based on RES “compliance costs” divided by total retail revenue dollars? If so, please provide the reasoning.
5. Cite to a statute, rule, or a Commission order that authorizes the calculation or any understanding of the Company that supports the calculation reported by the Company to be responsive to Commission Rule 4 CSR 240-20.100(8)(A)(1)P.
6. Please provide details to support the assertion that the RES Retail Rate Impact calculation does not present an accurate or complete picture of the investments that the Company has made in renewable energy.
7. Provide support for the statement that the rate impact of RES spending is at or above 1% as asserted on page 10 in the Company’s Report in File No. EO-2019-0315 and page 8 of the Company’s Report in File No. EO-2019-0316.
8. The Company’s Report on page 10 in File No. EO-2019-0315 and on page 9 in File No. EO-2019-0316 asserts that the RES Retail Rate Impact calculation does not present an accurate or complete picture of the investments that it has made in renewable energy. Please quantify the investment to renewable energy that the Company believes should be included in the RES Retail Rate Impact calculation.
9. Provide a calculation that includes all 2018 Company renewable energy revenue requirement components (return on renewable rate base + depreciation + O&M + A&G + taxes + fuel, purchase power and transmission related costs recovered in the FAC) divided by total retail kWh. Provide a workpaper (may be treated as confidential if warranted) that separates out each component of the revenue requirement.

THE COMMISSION ORDERS THAT:

1. The Company shall answer the above-listed questions no later than June 28, 2019.
2. Any other party who wishes to respond shall do so no later than July 3, 2019.



BY THE COMMISSION

A handwritten signature in black ink that reads "Morris L. Woodruff". The signature is written in a cursive style.

Morris L. Woodruff
Secretary

Ronald D. Pridgin, Deputy Chief
Regulatory Law Judge,
by delegation of authority pursuant to
Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 24th day of June, 2019.

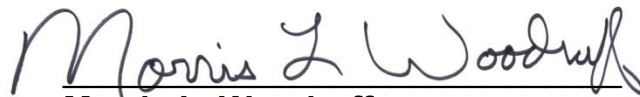
STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission,
at Jefferson City, Missouri, this 24th day of June 2019.




Morris L. Woodruff
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

June 24, 2019

File/Case No. EO-2019-0315 and EO-2019-0316

Missouri Public Service Commission

Staff Counsel Department
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel

Marc Poston
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov

Kansas City Power & Light Company

Robert Hack
1200 Main, 19th Floor
P.O. Box 418679
Kansas City, MO 64141-9679
rob.hack@kcpl.com

Kansas City Power & Light Company

Roger W Steiner
1200 Main Street, 16th Floor
P.O. Box 418679
Kansas City, MO 64105-9679
roger.steiner@kcpl.com

KCP&L Greater Missouri Operations Company

Robert Hack
1200 Main, 19th Floor
P.O. Box 418679
Kansas City, MO 64141-9679
rob.hack@kcpl.com

KCP&L Greater Missouri Operations Company

Roger W Steiner
1200 Main Street, 16th Floor
P.O. Box 418679
Kansas City, MO 64105-9679
roger.steiner@kcpl.com

Missouri Division of Energy

Rochelle Reeves
301 W. High St.
P.O. Box 1157
Jefferson City, MO 65102-1157
rreeves.deenergycases@ded.mo.gov

Missouri Public Service Commission

Jeff Keevil
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
jeff.keevil@psc.mo.gov

Renew Missouri

Tim Opitz
409 Vandiver Dr Building 5, Suite 205
Columbia, MO 65202
tim@renewmo.org

Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,



**Morris L. Woodruff
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.