## **MEMORANDUM**

TO: Missouri Public Service Commission Official Case File File No. EO-2015-0240, Tariff Tracking No. YE-2017-0172 Kansas City Power & Light Company

FROM: Brad J. Fortson, Regulatory Economist III

/s/John A. Rogers 3/20/2017/s/ Robert S. Berlin 3/20/2017Energy Resources Department / DateStaff Counsel Department / Date

SUBJECT: Staff Recommendation Regarding Revised Tariff Sheets.

DATE: March 20, 2017

On March 8, 2017, Kansas City Power & Light Company ("KCP&L") filed with the Commission revised tariff sheets, as requested by Commission Staff ("Staff"), to correct a typographical error and remove incorrect references to Commission Rule 4 CSR 240-20.094(4). Upon review, and as further requested by Staff, on March 9, 2017, KCP&L filed substitute tariff sheets correcting the effective dates of the revised tariff sheets and on March 14, 2017, KCP&L filed a substitute tariff sheet to remove an incorrect reference to Commission Rule 4 CSR 240-20.094(4) that was overlooked in the original filing of revised tariff sheets and subsequent filing of substitute tariff sheets. The revised tariff sheets carry an effective date of April 7, 2017.

## **Staff Review and Recommendation**

KCP&L's Original Sheet Nos. 2 and 2.24 include:

KCP&L may offer the Measures contained in the Company's filing approved by the Commission in Case No. EO-2015-0240. The offering of Measures not contained within the aforesaid filing must be approved by the Commission pursuant to 4 CSR 240-20.094(4).

KCP&L is proposing to delete "pursuant to 4 CSR 240-20.094(4)" on its 1<sup>st</sup> Revised Sheet Nos. 2 and 2.24. Commission Rule 4 CSR 240-20.094(4) states:

Pursuant to the provisions of this rule, 4 CSR 240-2.060, and section 393.1075, RSMo, an electric utility shall file an application with the commission for modification of demand-side programs by filing information and documentation required by 4 CSR 240-3.164(4) when there is a variance of twenty percent (20%) or more in the approved demand-side plan three (3)-year

budget and/or any program design modification which is no longer covered by the approved tariff sheets for the program.

Staff agrees with the deletions because the addition of measures that are not previously approved by the Commission does not change the program budgets and does not involve program design modifications that would require changes to the approved tariff sheets for the program. For example, the Commission's March 8, 2017, *Order Approving Application to Modify Demand-Side Programs* in Case No. EO-2015-0240 and EO-2015-0241approved the modification of measures listed in KCP&L's Commission-approved technical reference manual (TRM).

Staff has reviewed the filed revised tariff sheets and recommends the Commission approve the following revised tariff sheets as filed on March 8, 2017, and as substituted on March 9, 2017, and March 14, 2017:

P.S.C. MO. No. 2 Sheet No. 1.97 First Revised Sheet No. 1.97 Cancelling Original Sheet No. 1.97

P.S.C. MO. No. 2 Sheet No. 2 First Revised Sheet No. 2 Cancelling Original Sheet No. 2

P.S.C. MO. No. 2 Sheet No. 2.24 First Revised Sheet No. 2.24 Cancelling Original Sheet No. 2.24

Staff has verified that KCP&L has filed its 2015 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.