

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2015-0241, Tariff Tracking No. YE-2017-0171
KCP&L Greater Missouri Operations Company

FROM: Brad J. Fortson, Regulatory Economist III

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

SUBJECT: Staff Recommendation Regarding Revised Tariff Sheets.

DATE: March 20, 2017

On March 8, 2017, KCP&L Greater Missouri Operations Company (“GMO”) filed with the Commission revised tariff sheets, as requested by Commission Staff (“Staff”), to remove incorrect references to Commission Rule 4 CSR 240-20.094(4). Upon review, and as further requested by Staff, on March 9, 2017, GMO filed substitute tariff sheets correcting the effective dates of the revised tariff sheets. The revised tariff sheets carry an effective date of April 7, 2017.

Staff Review and Recommendation

GMO’s Original Sheet Nos. R-77 and R-100 include:

KCP&L Greater Missouri Operations Company may offer the Measures contained in the Company’s filing approved by the Commission in Case No. EO-2015-0241. The offering of Measures not contained within the aforesaid filing must be approved by the Commission pursuant to 4 CSR 240-20.094(4).

GMO is proposing to delete “pursuant to 4 CSR 240-20.094(4)” on its 1st Revised Sheet Nos. R-77 and R-100. 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* approved the modification of measures listed in GMO'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:

P.S.C. MO. No. 1 Sheet No. R-77

First Revised Sheet No. R-77 Canceling Original Sheet No. R-77

P.S.C. MO. No. 1 Sheet No. R-100

First Revised Sheet No. R-100 Canceling Original Sheet No. R-100

Staff has verified that GMO 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.