

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

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| In the Matter of the Application of KCP&L Greater |) | |
| Missouri Operations Company Containing Its Annual |) | File No. ER-2011-0417 |
| Fuel Adjustment Clause Mechanism. |) | |

STAFF RECOMMENDATION

Comes now the Staff of the Missouri Public Service Commission (Staff), by and through Staff Counsel's Office, and files its analysis of and recommendation concerning KCP&L Greater Missouri Operations Company's (GMO) fifth Fuel Adjustment Cause (FAC) true-up filing under the provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5). In support thereof, the Staff states as follows:

1. On June 29, 2011, GMO filed with the Missouri Public service Commission (Commission) an Application containing its fifth true-up respecting its FAC, and supporting direct testimony and schedules. The purpose of this true-up filing is to identify the amount of over- or under-recovery from the fifth 12-month recovery period under GMO's FAC. GMO reported that it had over-recovered \$683,699 from its customers for the GMO territory served as the MPS area, and over-recovered \$251,837 from its customers for the GMO territory served as the L&P area. GMO requested that pursuant to GMO's FAC, the Commission approve these amounts to be included in the next accumulation period which will cover the six months ended May 31, 2011.

2. On July 1, 2011, the Commission issued *Order Directing Notice, Acknowledging Automatic Parties, And Establishing Intervention Date* in which it ordered the Staff to file its recommendation no later than July 29, 2011.

3. Attached as Appendix A is the Staff Memorandum recommending that the Commission approve GMO's FAC true-up filing for Recovery Period 5. The Staff Memorandum notes that over-recovered amounts, \$683,699 for the MPS area and \$251,837 for the L&P area, are included in GMO's current period Cost Adjustment Factors (CAFs) in its semi-annual FAC filing in File No. ER-2011-0419 made on June 29, 2011 for Accumulation Period 8 (December 1, 2010 through May 31, 2011).

Wherefore the Staff files its analysis of and recommendation that the Commission approve GMO's fifth FAC true-up filing under the provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

Respectfully submitted,

/s/ Steven Dottheim

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Certificate of Service

I hereby certify that copies of the foregoing Staff Recommendation have been electronically mailed to all counsel of record this 29th day of July 2011.

/s/ Steven Dottheim