

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

In the Matter of Kansas City Power & Light Company's Application for Authorization To Suspend Payment of Certain Solar Rebates))))	<u>File No. ET-2016-0185</u> Tracking No. JE-2016-0184
--------------------------------------------------------------------------------------------------------------------------------	------------------	------------------------------------------------------------------

STAFF RECOMMENDATION TO APPROVE REVISED TARIFF SHEETS

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 January 18, 2016, Kansas City Power & Light Company (“KCPL”) filed with the Commission its *Tariff Revision*¹, *Application for Authority to Suspend Payment of Solar Rebates*, and *Direct Testimony of Tim M. Rush*, wherein KCPL seeks to revise its tariffs to suspend its solar rebate program.

2. On January 19, 2016, the Commission directed Staff to review KCPL’s filings and file a recommendation to the Commission. At the request of Staff, the Commission extended the date of submission for Staff’s report to March 1, 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, marked Highly Confidential.

4. Based on its investigation, Staff has determined that KCPL had complied with the Stipulation and Agreement approved by the Commission in Case No. ET-2014-0071, wherein the parties set a limit for solar rebate payments of

¹ KCPL submitted into the case file a *Substitute Tariff* on February 3, 2016, that represents the final approved version.

\$36.5 million incurred subsequent to August 31, 2012.² Staff determined that at the time of the application, KCPL has not yet paid out the full stipulated amount; however, Staff acknowledges that KCPL has received rebate applications which, if completed, would satisfy the solar rebate payment limit established in ET-2014-0071. Staff recommends the Commission affirm Staff's investigation.

5. Staff recommends the Commission find that KCP&L will reach the 1% average retail rate impact limit after completing solar rebate payments totaling \$36.5 million based on the calculations presented in Case No. ET-2014-0071, and recommends approval of KCPL's submitted revised tariff sheets identified as 3rd Revised Sheet No. 46 Cancelling 2nd Revised Sheet No. 46, 4th Revised Sheet No. 46A Cancelling 3rd Revised Sheet No. 46A, and 1st Revised Sheet No. 46B Cancelling Original Sheet No. 46B, to be effective March 18, 2016.

WHEREFORE, the Staff respectfully requests that the Commission accept this report for its consideration and recommends the Commission affirm Staff's investigation and approve of KCPL's application for authority to suspend payment of solar rebates.

² *Order Approving Stipulation and Agreement*, Case No. ET-2014-0071 (EFIS Item No. 35). See Exhibit A, Non-Unanimous Stipulation and Agreement, para. 7 a. Signatories are Staff, the Office of Public Counsel, KCPL, KCP&L Greater Missouri Operations Company, Missouri Industrial Energy Consumers, Missouri Solar Energy Industry Association, Brightergy, LLC, Earth Island Institute d/b/a Renew Missouri, and Missouri Division of Energy.

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

P.O. Box 360

Jefferson City, MO 65102

(573) 751-8517 (Telephone)

Hampton.Williams@psc.mo.gov

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 1st day of March, 2016.

/s/ Hampton Williams