

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

In the Matter of the Application of KCP&L Greater)
Missouri Operations Company Containing Its Annual)
Fuel Adjustment Clause True-Up.)

File No. ER-2013-0340

STAFF RECOMMENDATION

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), by and through counsel, and for its recommendation respectfully states:

1. On December 19, 2012, KCP&L Greater Missouri Operations Company ("GMO") filed an application containing its Fuel Adjustment Clause ("FAC") true-up filing to identify the amount of over- or under-recovery of the FAC for a previous 12-month recovery period, as required by Commission Rules 4 CSR 240-3.161 and 4 CSR 240-20.090.

2. Rule 4 CSR 240-20.090(5)(D) requires the Commission's Staff to examine and analyze the information GMO has submitted and to submit a recommendation to the Commission not later than 30 days after GMO made its filing—in this case, no later than January 18, 2013.

3. As explained in Staff's *Memorandum*, attached hereto as Appendix A and incorporated herein by reference, Staff recommends the Commission approve GMO's eighth true-up filing for Recovery Period 8, during which GMO under-recovered \$102,750 from customers in its MPS rate district, and under-recovered \$2,070 from customers in its L&P rate district.

4. Staff reviewed and analyzed the direct testimony and supporting schedules of GMO witness Linda J. Nunn. Staff found that GMO's calculations for the

true-up amounts, including interest, for Recovery Period 8 (September 1, 2011 through August 31, 2012) are correct. The under-recovered amounts, including accumulated interest, for the MPS and L&P rate districts are included in GMO's calculation of its proposed current period Cost Adjustment Factors in its semi-annual FAC adjustment filing in File No. ER-2013-0341.¹

5. Staff has verified that GMO has filed its 2011 annual report and is not delinquent on any assessment. GMO is current on its submission of its Surveillance Monitoring reports as required in 4 CSR 240-20.090(10), and its monthly reports as required by 4 CSR 240-3.161(5). With the exception of GMO's proposed current period Cost Adjustment Factors in its semi-annual FAC filing in File No. ER-2013-0341, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, Staff submits its analysis and recommends that the Commission approve GMO's eighth true-up filing for Recovery Period 8 under the provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

¹ *In the Matter of the Application of KCP&L Greater Missouri Operations Company for Authority to Implement Rate Adjustments Required by 4 CSR 240-20.090(4) and the Company's Approved Fuel Adjustment Clause*, filed on December 19, 2012. In this case, GMO requested Commission approval a tariff sheet to adjust rates for the FAC includable costs experienced during the six-month accumulation period June through November 2012.

Respectfully Submitted,

**STAFF OF THE MISSOURI
PUBLIC SERVICE COMMISSION**

/s/ John D. Borgmeyer

John D. Borgmeyer
Legal Counsel
Missouri Bar No. 61992

Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
Telephone: (573) 751-5472
Fax: (573) 751-9285
Email: john.borgmeyer@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered or transmitted by facsimile or electronic mail to all counsel of record this 18th day of January, 2013.

/s/ John D. Borgmeyer