

**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-2014-0372**

**STAFF RECOMMENDATION**

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

1. On June 30, 2014, KCP&L Greater Missouri Operations Company (“GMO”) filed an application containing its eleventh Fuel Adjustment Clause (“FAC”) true-up filing to identify the amounts of over or under-recovery of the FAC for its most recently completed 12-month recovery period, Recovery Period 11,<sup>1</sup> as required by Commission Rules 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

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 July 30, 2014.

3. As explained in Staff’s *Memorandum*, attached hereto as Appendix A and incorporated herein by reference, Staff recommends the Commission approve GMO’s eleventh true-up filing for Recovery Period 11, during which GMO under-recovered \$60,894 from customers in its MPS rate district, and over-recovered \$94,476 from customers in its L&P rate district.

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<sup>1</sup> March 1, 2013 through February 28, 2014



4. Staff reviewed and analyzed the direct testimony, supporting schedules and workpapers of GMO witness Linda J. Nunn. Staff has determined that GMO's calculations for the true-up amounts, including interest, for Recovery Period 11 are correct. The under-recovered amount for the MPS rate district and the over-recovered amount for the L&P rate district, including accumulated interest for the MPS and L&P rate districts, are included in GMO's calculation of its proposed current annual Fuel Adjustment Rates in its semi-annual FAC adjustment filing in File No. ER-2014-0373.<sup>2</sup>

5. Staff has verified that GMO has filed its 2013 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 changes to its current annual Fuel Adjustment Rates in its semi-annual FAC filing in File No. ER-2014-0373, 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 eleventh true-up amounts, \$60,894 from customers in its MPS rate district, and (\$94,476) from customers in its L&P rate district, for Recovery Period 11 under the provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

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<sup>2</sup> *In the Matter of the Application of KCP&L Greater Missouri Operations Company's FAC Tariff Revision* filed on June 30, 2014. In this case, GMO requested Commission approval of a revised tariff sheet to adjust rates for the FAC includable costs experienced during the six-month accumulation period (Accumulation Period 14) December 1, 2013 through May 31, 2014.



Respectfully Submitted,

**/s/ Robert S. Berlin**

Robert S. Berlin

Deputy Counsel

Missouri Bar No. 51709

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Missouri Public Service Commission

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### **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 25<sup>th</sup> day of July, 2014.

**/s/ Robert S. Berlin**



## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
File No. ER-2014-0372  
KCP&L Greater Missouri Operations Company

FROM: David Roos, Regulatory Economist III  
Matthew J. Barnes, Utility Regulatory Auditor IV

DATE: /s/ John Rogers 07-25-2014 /s/ Robert S. Berlin 07-25-2014  
Energy Resource Analysis Unit / Date Staff Counsel's Office / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning KCP&L Greater Missouri Operations Company's Eleventh Fuel Adjustment Clause True-up Filing Under the Provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: July 25, 2014

### Recommendation

Staff recommends the Commission approve KCP&L Greater Missouri Operations Company's ("GMO") eleventh true-up filing for Recovery Period 11 during which GMO under-recovered \$60,894 from customers in its MPS rate district, and over-recovered \$94,476 from customers in its L&P rate district.

### Discussion

On June 30, 2014, GMO filed with the Commission, in the form of direct testimony and supporting schedules by GMO witness Linda J. Nunn, its eleventh fuel adjustment clause ("FAC") true-up filing under the provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5). According to GMO's true-up filing, in the aggregate, GMO under-recovered from its customers in its MPS rate district \$60,894<sup>1</sup>, and over-recovered from its customers in its L&P rate district \$94,476, during Recovery Period 11 (March 1, 2013 through February 28, 2014) which followed its Accumulation Period 11 (June 1, 2012 through November 30, 2012).

The Missouri Public Service Commission Staff ("Staff") reviewed the direct testimony of GMO witness Linda J. Nunn, the supporting schedules GMO provided with GMO's application in this case, and the monthly information GMO submitted to the Commission in accordance with 4 CSR 240-3.161(5).

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<sup>1</sup> As defined on KCP&L Greater Missouri Operations Company, P.S.C.MO. No. 1, Original Sheet No. 126.2 the term T = The true-up amount shall be the difference between the revenues billed and the revenues authorized for collection during the RP as well as any corrections identified to be included in the current Fuel Adjustment Rate filing. Any corrections included will be discussed in the testimony accompanying the true-up filing.



Based on its review and analysis of the information GMO filed and submitted for Recovery Period 11, Staff has determined that GMO's calculations for the true-up amounts for Recovery Period 11, including the calculation of monthly interest, are correct. Staff recommends the Commission approve GMO's eleventh true-up filing for Recovery Period 11 during which GMO under-recovered \$60,894 from its customers in its MPS rate district, and over-recovered \$94,476 from its customers in its L&P rate district. The under-recovered amount for the MPS rate district and over-recovered amount for the L&P rate district, including accumulated interest, are included in GMO's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2014-0373 filed on June 30, 2014 for Accumulation Period 14 (December 1, 2013 through May 31, 2014).

Staff has verified that GMO has filed its 2013 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 changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2014-0373, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.



**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                                 )

Case No. ER-2014-0372

**AFFIDAVIT OF DAVID C. ROOS**

STATE OF MISSOURI     )  
                                   ) ss  
COUNTY OF COLE       )

David C. Roos, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.

  
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David C. Roos

Subscribed and sworn to before me this 25<sup>th</sup> day of July, 2014.



  
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Notary Public



