

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

In the Matter of KCP&L Greater Missouri )  
Operations Company's Request for Authority )  
to Implement a General Rate Increase for )  
Electric Service )

**Case No. ER-2016-0156**  
Tracking No. YE-2016-0223

**STAFF'S RESPONSE TO ORDER DIRECTING FILING**

**COMES NOW** the Staff of the Missouri Public Service Commission and responds to the Commission's order directing responses to the Commission's contemplation of approving tariff sheets complying with its decisions on KCP&L Greater Missouri Operations Company's ("GMO's") application in this case on a ten-month timeline that it will perform its work within whatever timeframe the Commission orders, but suggests the Commission consider the following when determining that timeframe:

1. GMO typically takes three to four weeks from the true-up cutoff date to provide to Staff all material needed for it to complete the true-up;
2. One way to make a less than 11-month timeframe work is to not have a true-up period, although GMO witness Klote has already identified the following as true-up items:<sup>1</sup>
  - a. Plant, Reserve, Depreciation (Includes Greenwood solar project and meters);
  - b. Revenues;
  - c. Payroll and benefits;
  - d. DSM costs;

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<sup>1</sup> Staff does not agree that Mr. Klote has necessarily listed all items that should be trued-up.

- e. Rate Case Expense;
- f. Trackers (Iatan 2, L&P phase-in, L&P Ice storm);
- g. Leases;
- h. Meter reading O&M; and
- i. Common Use Billing.

3. GMO's application is not typical because it is proposing to eliminate its MPS and L&P district specific pricing and implement uniform pricing throughout its service territory;

4. Although GMO has been working on its proposal since it entered into an agreement to explore doing so in October of 2012, when it filed this case on February 23, 2016, it did not have the impacts of its proposal on an individual customer basis and does not estimate when it will have them<sup>2</sup>;

5. Regardless of GMO's proposal to move to uniform pricing throughout its service territory, Staff must design rates for each of GMO's rate districts; and

6. If the Commission orders a shortened timeframe, it should also direct parties to develop an expedited discovery process.

**WHEREFORE**, Staff suggests that the Commission consider the above when determining the timeframe it orders for processing this case and, regardless of what timeframe it orders, Staff recommends that the Commission order a procedural conference to allow the parties to develop a proposed procedural schedule.

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<sup>2</sup> GMO witness Bradley D. Lutz direct, p. 9, ll. 8-11.

Respectfully submitted,

**/s/ Nathan Williams**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 1<sup>st</sup> day of March, 2016.

**/s/ Nathan Williams**