

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

In the Matter of the Determination of Carrying)
Costs for the Phase-In Tariffs of KCP&L Greater) **File No. ER-2012-0024**
Missouri Operations Company.)

STAFF'S POSITION STATEMENTS

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and states its positions on the issues listed in the *Issues List* filed December 21, 2011, as follows:

I. Issues List

1. Does the Commission have jurisdiction in this case?

Staff's Position: Yes.

2. Does the Commission decision consider all relevant factors?

Staff's Position: This is an issue posited by Ag Processing, Inc. a Cooperative and the Sedalia Industrial Energy Users' Association ("Industrial Intervenors") that Staff does not understand as the decision in question is unidentified; therefore, Staff has no position on this issue at this time.

3. Should GMO's carrying costs in the phase-in tariff schedules filed in this proceeding be 3.25% per year?

Staff's position: Yes, as supported by the testimony of Staff witness David Murray and KCP&L Greater Missouri Operations Company witness Kevin E. Bryant.

4. Should the Commission order that the tariff schedules filed with the Non-Unanimous Stipulation And Agreement on September 2, 2011, for the second, third and fourth year of the phase-in plan be allowed to become effective automatically in each

subsequent year on June 25 without further order of the Commission, unless suspended by the Commission for good cause shown?

Staff's position: The Commission should reject the phase-in tariff sheets filed May 31, 2011, in File No. ER-2010-0356 (Tracking No. YE-2010-0610) that bear effective dates of June 4, 2012, 2013, and 2014, respectively, specifically:

P.S.C. MO. No. 1

Effective June 04, 2012

- 5th Revised Sheet No. 18, canceling 4th Revised Sheet No. 18
- 5th Revised Sheet No. 19, canceling 4th Revised Sheet No. 19
- 5th Revised Sheet No. 21, canceling 4th Revised Sheet No. 21
- 5th Revised Sheet No. 22, canceling 4th Revised Sheet No. 22
- 5th Revised Sheet No. 23, canceling 4th Revised Sheet No. 23
- 5th Revised Sheet No. 24, canceling 4th Revised Sheet No. 24
- 5th Revised Sheet No. 25, canceling 4th Revised Sheet No. 25
- 5th Revised Sheet No. 28, canceling 4th Revised Sheet No. 28
- 5th Revised Sheet No. 29, canceling 4th Revised Sheet No. 29
- 5th Revised Sheet No. 31, canceling 4th Revised Sheet No. 31
- 5th Revised Sheet No. 34, canceling 4th Revised Sheet No. 34
- 5th Revised Sheet No. 35, canceling 4th Revised Sheet No. 35
- 5th Revised Sheet No. 41, canceling 4th Revised Sheet No. 41
- 5th Revised Sheet No. 42, canceling 4th Revised Sheet No. 42
- 5th Revised Sheet No. 43, canceling 4th Revised Sheet No. 43
- 5th Revised Sheet No. 44, canceling 4th Revised Sheet No. 44
- 5th Revised Sheet No. 47, canceling 4th Revised Sheet No. 47
- 5th Revised Sheet No. 48, canceling 4th Revised Sheet No. 48
- 5th Revised Sheet No. 50, canceling 4th Revised Sheet No. 50

Effective June 04, 2013

6th Revised Sheet No. 18, canceling 5th Revised Sheet No. 18
6th Revised Sheet No. 19, canceling 5th Revised Sheet No. 19
6th Revised Sheet No. 21, canceling 5th Revised Sheet No. 21
6th Revised Sheet No. 22, canceling 5th Revised Sheet No. 22
6th Revised Sheet No. 23, canceling 5th Revised Sheet No. 23
6th Revised Sheet No. 24, canceling 5th Revised Sheet No. 24
6th Revised Sheet No. 25, canceling 5th Revised Sheet No. 25
6th Revised Sheet No. 28, canceling 5th Revised Sheet No. 28
6th Revised Sheet No. 29, canceling 5th Revised Sheet No. 29
6th Revised Sheet No. 31, canceling 5th Revised Sheet No. 31
6th Revised Sheet No. 35, canceling 5th Revised Sheet No. 35
6th Revised Sheet No. 41, canceling 5th Revised Sheet No. 41
6th Revised Sheet No. 42, canceling 5th Revised Sheet No. 42
6th Revised Sheet No. 43, canceling 5th Revised Sheet No. 43
6th Revised Sheet No. 44, canceling 5th Revised Sheet No. 44
6th Revised Sheet No. 47, canceling 5th Revised Sheet No. 47
6th Revised Sheet No. 48, canceling 5th Revised Sheet No. 48
6th Revised Sheet No. 50, canceling 5th Revised Sheet No. 50

Effective June 04, 2014

7th Revised Sheet No. 18, canceling 6th Revised Sheet No. 18
7th Revised Sheet No. 19, canceling 6th Revised Sheet No. 19
7th Revised Sheet No. 21, canceling 6th Revised Sheet No. 21
7th Revised Sheet No. 22, canceling 6th Revised Sheet No. 22
7th Revised Sheet No. 23, canceling 6th Revised Sheet No. 23
7th Revised Sheet No. 24, canceling 6th Revised Sheet No. 24
7th Revised Sheet No. 25, canceling 6th Revised Sheet No. 25
7th Revised Sheet No. 28, canceling 6th Revised Sheet No. 28
7th Revised Sheet No. 29, canceling 6th Revised Sheet No. 29
7th Revised Sheet No. 31, canceling 6th Revised Sheet No. 31

6th Revised Sheet No. 34, canceling 5th Revised Sheet No. 34
7th Revised Sheet No. 35, canceling 6th Revised Sheet No. 35
7th Revised Sheet No. 41, canceling 6th Revised Sheet No. 41
7th Revised Sheet No. 42, canceling 6th Revised Sheet No. 42
7th Revised Sheet No. 43, canceling 6th Revised Sheet No. 43
7th Revised Sheet No. 44, canceling 6th Revised Sheet No. 44
7th Revised Sheet No. 47, canceling 6th Revised Sheet No. 47
7th Revised Sheet No. 48, canceling 6th Revised Sheet No. 48
7th Revised Sheet No. 50, canceling 6th Revised Sheet No. 50

Instead, the Commission should approve the exemplar tariff sheets marked as Exhibit A of the Non-unanimous Stipulation and Agreement filed September 2, 2011, in this case, and order KCP&L Greater Missouri Operations Company to file compliance tariff sheets that conform to them to take effect on the respective June 25th of 2012, 2013 and 2014 effective dates the exemplar tariff sheets bear. Specifically the exemplar tariff sheets, which do not have a tracking number, are:

P.S.C. MO. No. 1

Effective June 25, 2012

5th Revised Sheet No. 18, canceling 4th Revised Sheet No. 18
5th Revised Sheet No. 19, canceling 4th Revised Sheet No. 19
5th Revised Sheet No. 21, canceling 4th Revised Sheet No. 21
5th Revised Sheet No. 22, canceling 4th Revised Sheet No. 22
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5th Revised Sheet No. 44, canceling 4th Revised Sheet No. 44
5th Revised Sheet No. 47, canceling 4th Revised Sheet No. 47
5th Revised Sheet No. 48, canceling 4th Revised Sheet No. 48
5th Revised Sheet No. 50, canceling 4th Revised Sheet No. 50

Effective June 25, 2013

6th Revised Sheet No. 18, canceling 5th Revised Sheet No. 18
6th Revised Sheet No. 19, canceling 5th Revised Sheet No. 19
6th Revised Sheet No. 21, canceling 5th Revised Sheet No. 21
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6th Revised Sheet No. 47, canceling 5th Revised Sheet No. 47
6th Revised Sheet No. 48, canceling 5th Revised Sheet No. 48
6th Revised Sheet No. 50, canceling 5th Revised Sheet No. 50

Effective June 25, 2014

7th Revised Sheet No. 18, canceling 6th Revised Sheet No. 18

7th Revised Sheet No. 19, canceling 6th Revised Sheet No. 19
7th Revised Sheet No. 21, canceling 6th Revised Sheet No. 21
7th Revised Sheet No. 22, canceling 6th Revised Sheet No. 22
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7th Revised Sheet No. 48, canceling 6th Revised Sheet No. 48
7th Revised Sheet No. 50, canceling 6th Revised Sheet No. 50

WHEREFORE, the Staff of the Missouri Public Service Commission states the above positions on the issues listed in the *Issues List* filed December 21, 2011.

Respectfully submitted,

/s/ Nathan Williams
Nathan Williams
Deputy Staff Counsel
Missouri Bar No. 35512

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 23rd day of December, 2011.

/s/ Nathan Williams _____