

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

In the Matter of the KCP&L Greater Missouri Operations )	
Company Request for Authority to Implement Rate )	<b><u>Case No. ER-2019-0413</u></b>
Adjustments Required by 4 CSR 240-20.090(8) <sup>1</sup> )	<b><u>Tariff No. YE-2020-0033</u></b>
And the Company’s Approved Fuel and Purchased )	
Power Cost Recovery Mechanism )	
)	
In the Matter of the Application of KCP&L )	<b><u>Case No. ER-2019-0414</u></b>
Greater Missouri Operations Company, Containing )	
Its Semi-Annual Fuel Adjustment Clause True-Up )	

**STAFF RECOMMENDATION**

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

1. On September 12, 2019, KCP&L Greater Missouri Operations Company (“GMO”), following discussions with Staff and the Office of Public Counsel, filed a *Response to Order Directing Filing* in which it informed the Commission that the Parties had reached a resolution, and that it would be unnecessary to establish a procedural schedule.

2. On September 23, 2019, Staff filed a recommendation concerning the disposition of ER-2019-0413 and ER-2019-0414, as well as addressing the status of Tariff Revision YE-2020-0033. Staff recommended that the Commission issue an order approving the agreement disposing of the issue in the above-captioned cases as well as recommending that Tariff Revision YE-2020-0033 remain in effect.

3. On September 26, 2019, the Commission issued an order asking for Staff’s advice as to the specific true-up amounts contained in Case No. ER-2019-0414 and the dollar-amount of

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<sup>1</sup> Staff would like to note that the rule is now found at 20 CSR 4240-20.090(8) now the Commission rules fall under the Department of Commerce and Insurance.

the effect on GMO's Fuel Adjustment Clause rates per kilowatt hour, as well as any other changes that have resulted from the filing of the revised tariff and the agreement of the Parties.

4. As to the true-up over-recovery amount from Case No. ER-2019-0414, it remains the same. The true-up filing is the Recovery Period of Accumulation Period 21 ("AP21"), which encompasses an over-collection from its customers. The time period of AP21 is not the same accumulation period months as the months included in Case No. ER-2019-0413, which covers Accumulation Period 24 ("AP24"). AP21 covered the accumulation months of June 2017 through November 2017, prior to the retirement of Sibley generation facility. AP24 covers the accumulation months of December 2018 through May 2019, after the retirement of Sibley generation facility.

5. The true-up amounts for AP21 are correct as filed by GMO on June 28, 2019.

6. As for Revised Tariff No. YE-2020-0033, the total amount of \$497,238 which was excluded by the Company, per Commission order, on August 21, 2019, is the correct amount pursuant to Commission order, and the agreement of the Parties.

7. The amount consists of \$311,381 related to auxiliary power used by GMO for steam operations at Lake Road station and \$185,857 related to the cost of removal of coal and propane at the retired Sibley generation facility.

8. Staff would also like to again note that this only resolves the issues in AP21 and AP24. Staff has concerns over amounts in Accumulation Period 23 that Staff will be addressing in a later docket.

**WHEREFORE**, the Staff respectfully requests that the Commission issue an order accepting the agreement filed by KCP&L Greater Missouri Operations Company on September 12, 2019, maintain Tariff Revision YE-2020-0033, and to grant any such further relief that is deemed just in these circumstances.

Respectfully submitted,

**/s/ Travis J. Pringle**

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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 parties and/or counsel of record on this 30th day of September, 2019.

**/s/ Travis J. Pringle**