

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

In the Matter of Kansas City Power & Light Company's)
Submission of Its 2017 Renewable Energy Standard) **File No. EO-2017-0271**
Compliance Plan)

**STAFF REPORT ON KANSAS CITY POWER & LIGHT COMPANY'S
2017 – 2019 RENEWABLE ENERGY STANDARD COMPLIANCE PLAN**

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and submits its *Staff Report On Kansas City Power & Light Company's 2017 - 2019 Renewable Energy Standard Compliance Plan* to the Missouri Public Service Commission (Commission). In further support, Staff states:

1. On April 13, 2017, Kansas City Power & Light Company (“KCP&L” or “Company”) filed its 2017 Renewable Energy Standard (RES) Compliance Plan (Plan) for calendar years 2017 through 2019 as required by rule.¹

2. Commission rule 4 CSR 240-20.100(8) states:

...Each electric utility shall file an RES compliance report no later than April 15 to report on the status of both its compliance with the RES [renewable energy standard] and its compliance plan as described in this section for the most recently completed calendar year...

3. Rule 4 CSR 240-20.100(8)(A) specifies what information the utility must provide in its annual RES Compliance Report.

4. Rule 4 CSR 240-20.100(8)(D) provides that:

The staff of the commission shall examine each electric utility's annual RES compliance report and RES compliance plan and file a report of its review with the commission within forty-five (45) days of the filing of the annual RES compliance report and RES compliance plan with the commission. The staff's report shall identify any deficiencies in the electric utility's compliance with the RES.

¹ That same day KCP&L also filed its 2016 Renewable Energy Standard Compliance Report for calendar year 2016 in docket EO-2017-0269.

5. On April 13, 2017, the Commission issued its *Order Directing Notice And Setting Filing Deadline*, directing the Staff to file a report of its review of KCP&L's 2017 RES Compliance Plan no later than May 30, 2017.

6. Staff has conducted its review of KCP&L's 2017 RES Compliance Plan and has identified no deficiencies regarding the Company's minimum filing requirements of 4 CSR 240-20.100(8)(B) for the Company's 2017 RES Compliance Plan for calendar years 2017 - 2019. However, KCP&L has made an error in the calculation of its retail rate impact (RRI), specifically the carry-forward amount from previous years. 4 CSR 240-20.100(5)(G) states: "The initial cumulative carry-forward amount shall be equal to the sum of the annual carry-forward amounts for the period January 1, 2015, through December 31, 2015." The result of this error does not significantly alter the RRI calculation and therefore Staff recommends the Commission order KCP&L to make this correction in its 2018 Plan rather than requiring a revised RRI calculation for 2017. Staff's report is contained in its *Memorandum*, attached hereto as Appendix A (in both Highly Confidential and Public formats) and incorporated herein.

7. Staff notes the Commission has granted intervention in this matter to Missouri Industrial Energy Consumers, Missouri Department of Economic Development – Division of Energy, and Renew Missouri Advocates.

8. The Staff is unaware of any other case currently pending before the Commission that will affect or be affected by a decision in this file other than File No. EO-2017-0269 opened by KCP&L when it filed its 2016 RES Compliance Report.

WHEREFORE, the Staff submits its report for the Commission's information and consideration regarding KCP&L's 2017 RES Compliance Plan for calendar years

2017 – 2019 and recommends that the Commission issue an order directing KCP&L to correct its carry-forward error in calculating its RRI when it files its 2018 Plan.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 25th day of May, 2017, to all counsel of record.

/s/ Robert S. Berlin