

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

In the Matter of the Eighth Prudence Review)
of Costs Subject to the Commission-Approved)
Fuel Adjustment Clause of KCP&L Greater)
Missouri Operations Company)

File No. EO-2019-0067

STAFF'S EIGHTH PRUDENCE REVIEW REPORT

COMES NOW Staff of the Missouri Public Service Commission and submits Staff's Eighth Prudence Review Report (incorporated by reference) of costs related to the Fuel Adjustment Clause ("FAC") for the electric operations of KCP&L Greater Missouri Operations Company ("Company" or "GMO"). In support thereof, Staff states as follows:

1. On September 7, 2018, Staff filed *Staff's Notice of Start of Eighth Prudence Review* ("Notice") informing the Commission that it had begun its review of the costs subject to GMO's FAC. On September 11th, 2018, the Commission issued its *Order Directing Notice, Acknowledging Automatic Parties, and Establishing Deadlines for Intervention and Requesting a Hearing* ("Order").

2. The Notice described Staff's plan to conduct a prudence review of the costs and revenues associated with GMO's FAC for the period December 1, 2016 through May 31, 2018. This Review Period corresponds to the twentieth, twenty-first, and twenty-second sequential FAC accumulation periods (each accumulation period is 6 months) of GMO's FAC.

3. Staff has completed its prudence review and provides a detailed discussion of its findings in Staff's *Eighth Prudence Review of Costs Related To The Fuel Adjustment Clause For The Electric Operations Of Kansas City Power & Light Greater Missouri Operations Company* ("Prudence Review Report") submitted concurrently herewith in

Confidential and Public formats. As a result of its prudence review, and as more fully explained in the Prudence Review Report, Staff found no evidence of imprudence for the items it examined for the period of December 1, 2016, through May 31, 2018; however, on February 27, 2019, the Commission issued its *Order Suspending True-Up Timeline and Directing the Parties to File a Proposed Procedural Schedule* in Case No. ER-2019-0198 to allow the Commission to address the Office of the Public Counsel's challenge regarding allocation of charges for the auxiliary electric power used by GMO for its steam operations.

WHEREFORE, Staff requests the Commission accept its Prudence Review Report of GMO's FAC and that the Commission issue such further orders herein as the Commission deems proper.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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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 counsel of record this 28th day of February, 2019.

/s/ Jeffrey A. Keevil