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EX-2014-0352 COMMENTS

Missouri Public  
Service Commission

June 11, 2015

Good Morning. Thank you for this opportunity to comment concerning the proposed amendment of the Chapter 20 Net Metering and Renewable Energy Standard regulations. My name is Brad Lutz. I am a Manager in Regulatory Affairs representing Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company. I offer the following Comments to the Commission's Proposed Amendments as well as to comments offered by other parties in this case. I will refer to the companies collectively as "KCP&L" and should note that KCP&L's absence of comment does not necessarily mean that KCP&L agrees with the positions offered by others on this matter.

Generally, KCP&L agrees with the Commission's Proposed Amendments to the rules with a small number of exceptions. Additionally, KCP&L is in overall agreement with the Comments provided by Staff and by Ameren Missouri.

Beginning with Chapter 20.065 – Net Metering, KCP&L agrees with the revision to Section (1)(G) clarifying the definition of "Operational." KCP&L believes this definition describes a critical point in the interconnection process and establishing how the system becomes operational must be maintained by the electric utilities to ensure safe operation and clear administration of the net metering and solar rebate programs. Multiple parties represent that the operational date should be determined by others to prevent potential delays or manipulations of the system by the utilities to avoid paying customers rebates earned. As the utility receives no benefit from delaying payment, these representations are misplaced and should not be used to undermine this key point of control within the interconnection process. KCP&L has gone to great lengths to improve the interconnection and solar rebate processes and insure customers receive their rebates as intended. In File Numbers ET-2014-0059 and ET-2104-0071, the

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1 Company worked with the parties, including representatives of the solar industry, to define  
2 customer-controlled requirements for establishing when solar systems are installed and ready for  
3 rebate. Further, customer protections have already been added to the KCP&L process. In the  
4 November 2013 revision to our Solar Photovoltaic Rebate Program tariff, KCP&L added  
5 specific language committing the Company to pay rebates if the operational deadlines are missed  
6 due to our actions. The definition of "Operational" is correct as noted in the proposed rules.

7 In review of other comments offered, Renew Missouri objects to the addition of a  
8 requirement to have the customer show the permit number and approval certification provided by  
9 the local "Authority Having Jurisdiction" prior to interconnection. I would note that in areas  
10 with an "Authority Having Jurisdiction, KCP&L requires evidence of clearance before it can set  
11 a meter. This is consistent for all installations, not just net metering interconnections. Although  
12 we do not necessarily need a permit number, some evidence of clearance is needed.

13 KCP&L agrees with the "minimum bill" language used in Section 5)(c) Energy Pricing  
14 and Billing, of the Interconnection Application. Within the rates for KCP&L-Greater Missouri  
15 Operations Company we have retail rates that do not have a customer charge but instead have a  
16 defined minimum bill amount. Additionally, all of the KCP&L retail rate tariffs have minimum  
17 charges defined. The proposed changing of the language to "minimum bill" would help make  
18 the rule more applicable to our retail rates.

19 Next, as a general concern, KCP&L urges the Commission to fully consider the impact of  
20 the Commission Reports and Orders in File Nos. ET-2014-0059, ET-2014-0071 and ET-2014-  
21 0085. This consideration is important to ensure the new rules do not somehow change what the  
22 Company and other parties agreed to do in those cases.

Turning to Chapter 20.100 – Electric Utility Renewable Energy Standard Requirements, KCP&L reiterates its agreement with the definition of “Operational” as it is proposed in Section (1)(J). KCP&L also reiterates its request that the Commission fully consider the impact of the Commission Reports and Orders in File Nos. ET-2014-0059, ET-2014-0071 and ET-2014-0085 for this rule.

Moving to Section 5), the Retail Rate Impact (RRI), KCP&L has been supportive of calculating the Retail Rate Impact and has participated in each effort to define and apply the calculation. With that, KCP&L offers its objection concerning Renew Missouri’s characterization of the utilities as having avoided performing the calculation. KCP&L has regularly performed the RRI calculation. KCP&L is supportive of the “carry-forward” language within the proposed rule and suggests the proposed rule define the starting point for the carry forward calculation. KCP&L would support a date early in the RES implementation to incorporate activity from those periods into current calculations.

In review of the comments offered by the Office of Public Counsel (OPC) and Missouri Industrial Energy Consumers (MIEC) concerning Section 5), the parties propose incorporating language to account for the effect of lost billing units attributable to Renewable Energy Standard (RES) compliance on determining the RRI. KCP&L believes incorporating language for lost billing units may not achieve any material change to the RRI and could unnecessarily complicate the process. However, Ameren has previewed with us proposed rule language that they are sharing today that the Company would support. The language sets out a clear process to adjust the RRI and seems reasonable. In regards to their comments on Section 5)(B) concerning fuel and environmental costs, OPC/MIEC are correct that these are already being captured when the incremental non-renewable portfolio is subtracted from the incremental RES-compliant portfolio.

1 As performed by KCP&L, the calculation has not double counted these costs. KCP&L would  
2 however be supportive of the alternate language offered by MIEC to avoid any potential for  
3 double counting.

4 Finally, OPC, Renew Missouri and Wind on the Wires recommend the Commission add  
5 language requiring the Commission to establish a procedural schedule, allow for a hearing, and  
6 issue a final order concerning the report and plan. KCP&L supports the current RES compliance  
7 rule language and process. The current processes provide the parties with the opportunity to  
8 allege deficiencies before the Commission. As deficiencies are generally a matter of  
9 interpretation, the Complaint process is appropriate for exploring and ruling on these concerns.  
10 Further, those claims that the burden of RES enforcement falls on non-governmental parties,  
11 ignore the role of Commission Staff and the OPC. The current oversight of RES compliance is  
12 reasonable and effective and the proposed change, beyond the topics addressed in House Bill  
13 142, should be rejected.

14 Thank you again for this opportunity to comment.