

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

In the Matter of the Application of KCP&L )	
Greater Missouri Operations Company for )	
Permission and Approval of a Certificate of )	
Public Convenience and Necessity Authorizing )	Case No. EA-2015-0256
It to Construct, Install, Own, Operate, Maintain )	
and Otherwise Control and Manage Solar )	
Generation Facilities in Western Missouri. )	

**PROPOSED PROCEDURAL SCHEDULE**

COMES NOW KCP&L Greater Missouri Operations Company (“GMO” or “Company”) and respectfully submits the following proposed Procedural Schedule.

1. On November 12, 2015 GMO filed an Application with the Missouri Public Service Commission (“Commission”) requesting a Certificate of Convenience and Necessity (“CCN”) as authorized by Section 393.170, RSMo 2000. The CCN would authorize GMO to construct, install, own, operate, maintain and otherwise control and manage a solar electrical production facility (“the Project”) in Jackson County, Missouri. GMO asked the Commission to approve its Application by January 31, 2016.

2. The Office of the Public Counsel (“OPC”) filed a motion on December 28, 2015, asking the Commission to schedule a procedural conference at which the parties could discuss a proposed procedural schedule for this case.

3. The Commission issued an Order Scheduling a Procedural Conference on January 6, 2016 ordering that a procedural conference be held on January 14, 2016 at 2:00 p.m.

4. The parties have not been able to agree to a proposed procedural schedule. GMO does not believe that its request for a CCN in this case lends itself to several rounds of testimony. Instead, the Company believes that the best use of the Company’s and the parties’ resources

would be for the Commission to require the parties to stipulate facts so that it can make a determination whether the Company should build a 3 MW AC solar electrical production facility in Jackson County, Missouri.

5. The Commission Staff and OPC have conducted discovery through data requests in this case and the Company believes that they have several issues related to the cost of the Project. The Company believes that these cost issues will not be decided in this proceeding but will be decided in a rate case when the plant is put into rates. The Company desires that the Commission make a policy decision on whether it will allow the Company to move forward to build the Project.

6. In order to have a factual basis to reach its policy decision on the need for the Project, the Company proposes that the Commission order the parties to provide a list of stipulated facts. These stipulated facts should include:

- a. The Project is not the least cost option at this time.
- b. The Project is not needed at this time to provide Solar Renewable Energy Certificates (“SRECs”) for compliance with the current Missouri Renewable Energy Standard (“RES”).
- c. The Company reflected the addition of a small scale solar generation system in its most recent Integrated Resource Plan, and its Preferred Plan.
- d. The Project will provide the Company with valuable hands on experience in operating a solar electrical production facility which the Company believes will assist it in evaluating the potential of future large scale solar installations.
- e. The Commission granted a CCN to Ameren for a small solar project (5.7 MW DC) in Case No. EA-2014-0136 on April 8, 2014.

- f. GMO is qualified to control and manage the Project.
- g. GMO has the financial ability to build the Project.
- h. The state of Missouri has not yet developed and submitted its state plan as required under the Clean Power Plan.
- i. The IRC Section 48 Energy Credit that applies to solar facilities was extended by Congress on December 18, 2015. The credit will continue at the level of 30% of qualifying costs through tax year 2019.
- j. The Company will be filing a rate case on or before February 25, 2016, as required under the guidelines for electric utilities that utilize a fuel adjustment clause (“FAC”). Under the rules governing the FAC, a utility is required to file a rate case at least every four years.

7. With the above facts stipulated, the Commission will be able to hold a hearing, if requested by a party, to determine if the application should be granted and whether the Project is highly important to the public convenience and desirable for the public welfare. Several rounds of testimony would be an inefficient use of resources for all parties, especially for a plant of this size and where the contested issues can be stipulated. The Commission will need to determine if the benefit of the Company gaining solar experience while providing renewable, zero emission energy to customers outweighs the fact that the Project is not the least cost option, is not needed for RES compliance, and is not needed to meet the immediate energy needs of GMO’s customers.

8. The Company suggests a hearing on February 10, 2016. One round of briefs to be filed on February 17, 2016. The Company would also request an order date of February 29, 2016.

9. Should the Commission determine that it must have a procedural schedule with direct, rebuttal and surrebuttal testimony followed by a hearing, the Company will need to re-evaluate its application and possibly withdraw its application and not pursue the Project at this time. The primary reason for requesting a hearing and decision as proposed above is to coordinate the construction of the Project with GMO's planned rate case filing. If the Project cannot be completed in coordination with the rate case true-up period, it would be detrimental to the Company's shareholders to move forward at this time.

10. Brightergy, LLC and the Missouri Department of Economic Development – Division of Energy support GMO's Proposed Procedural Schedule.

**WHEREFORE**, GMO requests that the Proposed Procedural Schedule set forth above be adopted by the Commission.

Respectfully submitted,

/s/ Roger W. Steiner

Robert J. Hack, MBN 36496

Phone: (816) 556-2791

E-mail: [rob.hack@kcpl.com](mailto:rob.hack@kcpl.com)

Roger W. Steiner, MBN 39586

Phone: (816) 556-2314

E-mail: [roger.steiner@kcpl.com](mailto:roger.steiner@kcpl.com)

Kansas City Power & Light Company

1200 Main – 16<sup>th</sup> Floor

Kansas City, Missouri 64105

Fax: (816) 556-2787

**Counsel for KCP&L Greater Missouri  
Operations Company**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was served upon all counsel of record on this 19<sup>th</sup> day of January 2016, by either e-mail or U.S. Mail, postage prepaid.

/s/ *Roger W. Steiner*

Roger W. Steiner