

APR 10 2014

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Missouri Solar Energy Industries)
 Association's Informal Complaint for KCP&L's) File No.
 Failure to Conform to Solar Rebate Process)

Missouri Public
Service CommissionINFORMAL COMPLAINT

COMES NOW Missouri Solar Energy Industries Association ("MOSEIA"), pursuant to 4 CSR 240-2.070, and for its Informal Complaint for KCP&L's Failure to Conform to Solar Rebate Process, states as follows:

PARTIES

1. MOSEIA has its principal place of business at P.O. Box 434040, St. Louis, MO 63143. MOSEIA is a not for profit corporation that represents solar industry stakeholders supporting policy issues focused on solar job creation and sustainable economic growth in Missouri. MOSEIA was formed in large part due to the passage of Proposition C, or the Missouri Renewable Energy Standard ("RES"). Proposition C mandated 15% of the electricity produced by Missouri investor owned utilities comes from renewable sources by 2021, 2% of which must come from solar photovoltaics. MOSEIA and its members have an interest in the full implementation and enforcement of the Missouri RES, as well as the solar rebate program, in that the organization's mission is to strengthen and expand the Missouri solar industry and establish a sustainable energy future for all Missourians. MOSEIA's interest is different than that of the general public.

2. The signature, telephone number, facsimile number and email address of MOSEIA are those of their legal representatives and can be found in the signature block at the end of this pleading.

3. Kansas City Power & Light Company ("KCP&L"), 1200 Main Street, Kansas City, MO 64105, is an electrical corporation and public utility as defined in Section 386.020, RSMo engaged in the business of manufacture, transmission, and distribution of electricity subject to the regulatory authority of the Commission pursuant to Chapters 386 and 393, RSMo.

COMPLAINT

4. MOSEIA, on behalf of itself and its members, are aggrieved by KCP&L's failure to conform to the Solar Rebate Process due to KCP&L's failure to comply with the procedures in an agreement entered into with industry stakeholders to update the program spend chart on KCP&L's website.

5. That on or about October 3, 2013, KCP&L entered into a Non-Unanimous Stipulation and Agreement with several signatories, including MOSEIA, in case No. ET-2014-0071, and Section 7.c. of that agreement states "All solar rebates, subject to this Agreement, will be paid according to applicable statutes, rules and tariffs. The Signatories also agree to cooperate in the development of all aspects of an order process to cease or conclude the solar rebate payments to solar customers, including updating KCP&L's website for applied for applications, the level of solar rebate payments, and approved applications for both KCP&L and GMO." The Commission issued an Order on October 30, 2013 approving the Stipulation and Agreement, with an effective date of November 10, 2013.

6. Following approval of the Stipulation and Agreement, the Solar Rebate Processes Agreement that KCP&L entered into stated "Once the application has passed administrative review and funds are NOT available, customer will be placed in queue and notified via a letter that they will continue down the net metering path, but will not have a commitment for solar rebate. A customer will be entitled to the corresponding rebate if their project is completed prior

to June 30 of the following year and funds become available under the new cap amount. If funds become available, a notice will be sent to additional customers, based on the amount available and the customer's order in the queue, informing them of the rebate availability. These additional rebate offers will be paid subject to the terms and timing established by the Net Metering and Solar Rebate tariffs. This cycle will continue for any funds becoming available until all funds are paid out."

7. Further, the Agreement stated that "KCP&L will provide transparent weekly updates to demonstrate the make-up of the queue. A chart and spreadsheet will be made available to detail the projects in the queue. The spreadsheet will include Date of Application, Tracking Number, Service Territory, and System Size for Applications Received and Pre-Approved Applications and totals for the System Size and counts for Applications Received and Pre-Approved Applications categories. If due to some website limitation a spreadsheet cannot be posted to the website, a copy of the spreadsheet will be emailed separately to each of the parties."

8. That KCP&L has not updated the program spend chart on their website since February 7, 2014, nor have they sent out by email a copy of the spreadsheet to each party.

9. That the information contained in the chart and spreadsheet detailing the projects in the queue is critical to businesses in the solar industry in order for said businesses to effectively communicate with clients and to effectively manage the projects currently pending.

10. That many MOSEIA members are concerned they may be committing to projects that are unfunded because, unbeknownst to them, the funding cap for rebates has already been reached.

11. That MOSEIA members have contacted KCP&L Kristin Riggins, the KCP&L employee responsible for updating the program spend chart on the website, several times in an attempt to get an update from the company, but have had no success in getting an updated make-up of the queue.

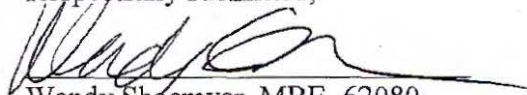
12. That MOSEIA understands that Kristin Riggins has recently started in her current position, and is sympathetic to the fact that updates may be delayed because of the job transition, but MOSEIA and its members cannot afford to wait any longer for an update regarding the make-up of the queue.

13. That MOSEIA would request that KCP&L be ordered to immediately post the updated information regarding the make-up of the queue on their website, in accordance with the Commission approved Stipulation and Agreement in case number ET-2014-0071.

CONCLUSION

Wherefore, for the reasons set forth herein, MOSEIA respectfully requests the Commission order KCP&L to immediately post the updated information regarding the make-up of the queue to their program spend chart on their website, and award all such further relief the Commission deems appropriate.

Respectfully submitted,



Wendy Shoemyer, MBE 62080

Joe Maxwell, MBE 37999

Hagan-Maxwell, LLC

210 East Love Street

Mexico, MO 65265

(573) 581-8373 - Telephone

(573) 581-8486 - Fax

E-mail: jmaxwell@hagan-maxwell.com

E-mail: wshoemyer@hagan-maxwell.com

ATTORNEYS FOR MOSEIA