

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

**In the Matter of the 2013 Kansas City)
Power & Light Company Annual IRP) File No. EO-2013-0537
Update Report)**

**MISSOURI DEPARTMENT OF NATURAL RESOURCES'
COMMENTS ON KANSAS CITY POWER AND LIGHT COMPANY'S
INTEGRATED RESOURCE PLAN ANNUAL UPDATE FILING**

COMES NOW the Missouri Department of Natural Resources (MDNR), by and through counsel and pursuant to 4 CSR 240-22.080(3)(D) and submits its comments on Kansas City Power & Light Company's (KCP&L) 2013 Integrated Resource Plan Annual Update Report.

Kansas City Power & Light Company submitted its 2013 Annual Update report in File No. EO-2013-0537 on June 20, 2013. Kansas City Power & Light Company followed up its report with an update meeting on July 11, 2013 and submitted its report summary on July 22, 2013.

Kansas City Power & Light Company has done an adequate job in updating their 2013 IRP. The analysis provided by the Navigant report was both thorough and helpful.

However, MDNR still has reservations with KCP&L's continued adherence to the jointly determined resource acquisition strategy as an

uncertain factor, even though GMO's actions are outside KCP&L's control and even though a number of readily conceivable circumstances could lead GMO to conclude that the resource acquisition strategy is no longer appropriate (as mentioned on page 85 of KCP&L's June 2013 IRP Annual Update, see MDNR Deficiency 13). This approach fails to address contingency resource planning for KCP&L's response should GMO take actions that would render the jointly determined preferred plan obsolete. In 4 CSR 240-22.020 (7), contingency resource plan is defined as "an alternative resource plan designed to enhance the utility's ability to respond quickly and appropriately to events or circumstances that would render the preferred resource plan obsolete."

These considerations suggest that combined analysis is a risk factor (see CSR 240-22.060). The Commission may wish to consider this when responding to KCP&L's request to "acknowledge" combined analysis on page 81 of the KCP&L June 20, 2013 IRP Annual Update (see MDNR Deficiency 13).

Summary

Kansas City Power & Light Company has provided an update report and update session that communicated the major changes that have taken place in the utility's preferred plan and resource acquisition strategy since its last triennial compliance filing. Kansas City Power & Light Company

identified the key issues and changes it has been considering and provided the information at a level of depth and detail that was appropriate to these changes and issues.

WHEREFORE, the Missouri Department of Natural Resources respectfully provides these comments.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted electronically to all counsel of record this 21st day of August, 2013.

/s/ Timothy A. Blackwell
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