

In the Matter of the 2013 KCP&L Greater Missouri Operations Company Annual Update Report)
) **File No. EO-2013-0538**
)

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 KCP&L Greater Missouri Operations (GMO) Integrated Resource Plan Annual Update Report.

GMO submitted its 2013 Annual Update report in File No. EO-2013-0538 on June 20, 2013. KCP&L-GMO followed up its report with an update meeting on July 11, 2013 and submitted its report summary on July 22, 2013.

GMO 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 GMO'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 80 of KCP&L's June 2013 IRP Annual Update). This approach fails to address contingency resource planning for GMO's response should KCP&L-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 GMO's request to "acknowledge" combined analysis on page 80 of the KCP&L June 20, 2013 IRP Annual Update (see MDNR Deficiency13).

Summary

GMO 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. GMO 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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**Attorney for Missouri Department
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was
emailed, on August 21, 2013, to:

Mary Ann Young-DNR/EGY

/s/ Timothy A. Blackwell

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