BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of KCP&L Greater Missouri Operations Company Containing Its Semi-Annual Fuel Adjustment Clause True-Up

Case No. ER-2019-____

APPLICATION OF KCP&L GREATER MISSOURI OPERATIONS COMPANY CONTAINING ITS FUEL ADJUSTMENT CLAUSE TRUE-UP

Pursuant to 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5), KCP&L Greater Missouri Operations Company ("GMO") hereby respectfully submits to the Missouri Public Service Commission ("Commission") an application ("Application") containing its true up concerning its fuel adjustment clause ("FAC") to remedy an under-collection of \$164,490. GMO respectfully requests that the Commission approve the undercollection amount as calculated by GMO and authorize GMO to include that amount in the next accumulation period and, in support, states as follows:

1. GMO is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. GMO is primarily engaged in the business of providing electric and steam utility service in Missouri to the public in its certificated areas. GMO is an electrical corporation and public utility as defined in Section 386.020 (2000), as amended. *Id.* A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing the GMO's authority under the law to conduct business in the State of Missouri, was filed with the Commission in Case No. EU-2002-1053 and is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G). GMO's fictitious name registration was filed in Case No. EN-2009-0015 and is incorporated herein by reference.

2. GMO holds Certificates of Convenience and Necessity from the Commission to transact business as an electric public utility in certain areas of the State of Missouri and is principally engaged in the generation, transmission, distribution and sale of electric power and energy. GMO has one pending action¹ against it from any state or federal agency or court that involve customer service or rates, which has occurred within three years of the date of this Application. In addition, no annual report or assessment fees are overdue.

3. In addition to undersigned counsel, pleadings, notices, orders and other correspondence and communications concerning this Application should be addressed to:

Lisa A. Starkebaum Manager - Regulatory Affairs Kansas City Power & Light Company 1200 Main – 19th Floor Kansas City, Missouri 64105 Phone: (816) 556-2209 Fax: (816) 556-2110 Email: <u>lisa.starkebaum@kcpl.com</u>

Anthony R. Westenkirchner Senior Paralegal - Regulatory Affairs Kansas City Power & Light Company 1200 Main – 16th Floor Kansas City, Missouri 64105 Phone: (816) 556-2668 Fax: (816) 556-2787 Email: <u>anthony.westenkirchner@kcpl.com</u>

4. In its Report and Order issued May 17, 2007, in Case No. ER-2007-0004, the Commission approved GMO's use of a FAC pursuant to 4 CSR 240-3.161 and 4 CSR 240-20.090. The consolidation of the MPS and L&P rate districts was established as ordered by the Commission in Rate Case No. ER-2016-0156, effective February 22, 2017.

5. As explained in the Direct Testimony of Lisa Starkebaum, being submitted herewith, during GMO's 20th recovery period, GMO under-collected \$164,490.

6. In support of its Application and pursuant to 4 CSR 240-3.161(8)(A), GMO is filing the following information herewith: "1. Amount of costs that it has over-collected or under-collected through the RAM by rate class and voltage level; 2. Proposed

¹ Dana Heffner v. Kansas City Power & Light Company, File No. EC-2019-0109. Please note, Complainant's filing initiating this docket incorrectly identifies Kansas City Power & Light Company as its electric service provider. Complainant is actually served by GMO.

adjustments or refunds by rate class and voltage level; [and] 3. Electric utility's short-term borrowing rate." Moreover, in further support of its Application and pursuant to 4 CSR 240-3.161(8)(B), GMO is submitting the following information to the Commission and serving it upon the parties: "1. Workpapers detailing how the determination of the over-collection or under-collection of costs through the RAM was made including any model inputs and outputs and the derivation of any model inputs; 2. Workpapers detailing the proposed adjustments or refunds; [and] 3. Basis for the electric utility's short-term borrowing rate."

7. Based on the information contained in this Application and provided herewith, GMO respectfully requests that the Commission approve the under-collection amount as calculated by GMO and authorize GMO to include that amount in its next accumulation period.

Respectfully submitted,

s Roger W. Steiner

Robert J. Hack, MBN 36496 Phone: (816) 556-2791 E-mail: rob.hack@kcpl.com Roger W. Steiner, MBN 39586 Phone: (816) 556-2314 E-mail: roger.steiner@kcpl.com Kansas City Power & Light Company 1200 Main – 16th Floor Kansas City, Missouri 64105 Fax: (816) 556-2787

Attorneys for KCP&L Greater Missouri Operations Company

AFFIDAVIT

State of Missouri)) SS County of Jackson)

I, Darrin R. Ives, having been duly sworn upon my oath, state that I am Vice President, Regulatory Affairs of Kansas City Power & Light Company, that I am duly authorized to make this affidavit on behalf of KCP&L Greater Missouri Operations Company, and that the matters and things stated in the foregoing application and appendices thereto are true and correct to the best of my information, knowledge and belief.

Darrin R. Ives

Subscribed and sworn before me this 31st day of December 2018.

Notary Public

My Commission expires: $\frac{4}{24}$



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application was served on all counsel of record either by electronic mail or by first class mail, postage prepaid, on this 31^{st} day of December 2018.

[s] Roger W. Steiner Roger W. Steiner