

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

In the Matter of the Application of KCP&L)	
Greater Missouri Operations Company)	<u>File No. ER-2017-0359</u>
Containing Its Semi-Annual Fuel Adjustment)	
Clause True-Up)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through the undersigned counsel, and for its recommendation respectfully states:

1. On June 30, 2017, KCP&L Greater Missouri Operations Company ("GMO") filed an application with the Missouri Public Service Commission ("Commission") containing its seventeenth Fuel Adjustment Clause ("FAC") true-up filing to identify the amounts of over or under-recovery of the FAC for its most recently completed 12-month recovery period, Recovery Period 17,¹ as required by Commission Rules 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

2. Rule 4 CSR 240-20.090(5)(D) requires Staff to examine and analyze the information GMO has submitted and to submit a recommendation to the Commission not later than 30 days after GMO made its filing, which in this case is not later than July 31, 2017.

3. As explained in Staff's *Memorandum*, attached hereto as Appendix A and incorporated herein by reference, Staff recommends the Commission approve GMO's seventeenth true-up filing for Recovery Period 17, during which GMO over-recovered from its customers \$57,081 which followed its Accumulation Period 17 (June 1, 2015 through November 30, 2015).

¹ March 1, 2016 through February 28, 2017.

4. Staff reviewed and analyzed the direct testimony, supporting schedules, and workpapers of GMO witness Lisa A. Starkebaum and the monthly information GMO submitted to the Commission as required by 4 CSR 240-3.161(5).

5. Staff has verified that GMO has filed its 2016 annual report and is not delinquent on any assessment. GMO is current on its submission of its Surveillance Monitoring reports as required in 4 CSR 240-20.090(10), and its monthly reports as required by 4 CSR 240-3.161(5). With the exception of GMO's proposed changes to its current annual Fuel Adjustment Rate in its semi-annual FAC filing in File No. ER-2017-0357, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, Staff prays the Commission accept the results of its analysis and recommends that the Commission approve GMO's seventeenth true-up filing amount of (\$57,081) resulting from GMO's over-recovery of \$57,081 from customers during Recovery Period 17 which will be returned to customers as a part of GMO's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2017-0357.

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin
Deputy Staff Counsel
Missouri Bar No. 51709

Attorney for the Staff of the
Missouri Public Service Commission
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 31st day of July, 2017, to all counsel of record.

/s/ Robert S. Berlin

M E M O R A N D U M

TO: Missouri Public Service Commission Official Case File
File No. ER-2017-0359
KCP&L Greater Missouri Operations Company

FROM: David C. Roos, Regulatory Economist III
Ron Irving, Utility Regulatory Auditor I

/s/ John A. Rogers 07/31/2017 /s/ Robert S. Berlin 07/31/2017
Energy Resources Department / Date Staff Counsel Department / Date

SUBJECT: Staff's Analysis Of and Recommendation Concerning KCP&L Greater Missouri Operations Company's Sixteenth Fuel Adjustment Clause True-up Filing Under the Provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: July 31, 2017

Recommendation

Staff recommends the Commission approve KCP&L Greater Missouri Operations Company's ("GMO") seventeenth true-up filing for Recovery Period 17 ("RP17") during which GMO over-recovered \$57,081 from its customers.

Discussion

On June 30, 2017, GMO filed with the Commission, along with direct testimony and supporting schedules of GMO witness Lisa A. Starkebaum, its seventeenth fuel adjustment clause ("FAC") true-up filing under the provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5). According to GMO's true-up filing, in the aggregate for RP17 (March 1, 2016 through February 28, 2017), GMO over-recovered from its customers \$57,081 which followed its Accumulation Period 17 (June 1, 2015 through November 30, 2015).

The Missouri Public Service Commission Staff ("Staff") reviewed the direct testimony of GMO witness Lisa A. Starkebaum, the supporting schedules GMO provided with GMO's

application in this case, and the monthly information GMO submitted to the Commission in accordance with 4 CSR 240-3.161(5).

Staff Review

Based on its review and analysis of the information GMO filed and submitted for RP17, Staff has determined that GMO's calculations for the true-up amounts for RP17, including the calculation of monthly interest, are correct

Therefore, Staff recommends the Commission approve GMO's seventeenth true-up filing for RP17 during which GMO over-recovered \$57,081 from its customers. The over-recovered amount will be returned to customers as it will be included in GMO's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2017-0357 filed on June 30, 2017, for AP20 (December 1, 2016 through May 31, 2017).

Staff has verified that GMO has filed its 2016 Annual Report and is not delinquent on any assessment. GMO is current on its submission of its Surveillance Monitoring reports as required by 4 CSR 240-20.090(10), and its monthly reports as required by 4 CSR 240-3.161(5). With the exception of GMO's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2017-0357 Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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In the Matter of the Application of KCP&L)
Greater Missouri Operations Company) Case No. ER-2017-0359
Containing Its Semi-Annual Fuel Adjustment)
Clause True-up)

AFFIDAVIT OF RON IRVING

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW RON IRVING and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Staff Recommendation in Memorandum form; and that the same is true and correct according to his best knowledge and belief.

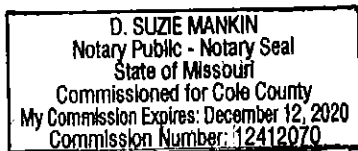
Further the Affiant sayeth not.

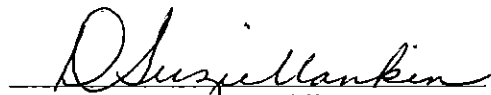


RON IRVING

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 31st day of July, 2017.





Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company) Case No. ER-2017-0359
Containing Its Semi-Annual Fuel Adjustment)
Clause True-up)

AFFIDAVIT OF DAVID C. ROOS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW DAVID C. ROOS and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Staff Recommendation in Memorandum form; and that the same is true and correct according to his best knowledge and belief.

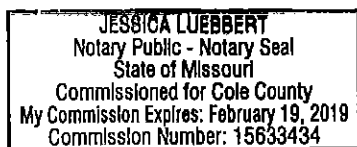
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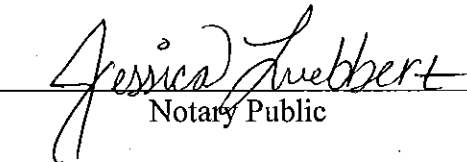


DAVID C. ROOS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 31st day of July, 2017.





Notary Public