OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light Company's Request for Authority to Implement A General Rate Increase for Electric Service))	Case No. ER-2018-0145
In the Matter of KCP&L Greater Missouri Operations Company's Request for Authorization to Implement A General Rate Increase for Electric Service))	Case No. ER-2018-0146

MOTION FOR SUPPLEMENTAL DIRECT TESTIMONY IN FURTHERANCE OF STAFF'S REPORT ON DISTRIBUTED ENERGY RESOURCES

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), by and through counsel, and states the following:

- 1. On April 5, 2018, in File No. EW-2017-0245, Staff submitted its *Report on Distributed Energy Resources* ("Staff Report") summarizing the information received from stakeholders responding to a series of Commission questions, and provided Staff's analysis and recommendations.
- 2. Under Subsection VI of the Staff Report, which provides for "Retail aggregation and the Indiana Model", Staff recommended the Commission encourage the electric utilities to submit tariffs similar to the Indiana Model. Specific to Kansas City Power and Light Company ("KCPL") and KCP&L Greater Missouri Operations Company ("GMO"), Staff recommended the Commission direct the Companies to submit supplemental direct testimony responding to this recommendation in their pending rate cases.
- 3. On April 18, 2018, the Commission issued its *Response to Staff Report*Regarding Distributed Energy Resources ("Response") in EW-2017-0245. In its

Response, the Commission ordered acceptance of the recommendations offered by Staff in the April 5, 2018, Staff Report.

4. Therefore, in furtherance of the Commission's April 18, 2018, Order, Staff respectfully requests that the Commission direct KCPL and GMO to submit supplemental direct testimony responding to the recommendations contained in Staff's Report in the above captioned cases, no later than June 19, 2018. Specifically, Staff requests the Commission direct KCPL and GMO to respond to the recommendations and submit exemplary tariffs, if applicable, related to demand response and the Indiana Model, explain whether those issues should be addressed in the rate cases or in MEEIA Cycle III cases, and more generally, provide any additional information on the companies' plans related to distributed energy resources not already provided in their January 30, 2018, direct testimony.

WHEREFORE, Staff requests the Commission order KCP&L and GMO to file the supplemental direct testimony identified herein; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Mark Johnson

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 23rd day of April, 2018.

Isl Mark Johnson