

The Office of the Public Counsel and
The Midwest Energy Consumers Group,

Complainants,

v.

KCP&L Greater Missouri Operations Company

Respondent.

V.

KCP&L Greater Missouri Operations Company
Respondent.

COMES NOW the Staff of the Public Service Commission and presents its position statements for the evidentiary hearing scheduled for August 7-8, 2019, in this case.

1. Does the retirement of Sibley Units 1, 2, and 3 and common plant constitute an extraordinary event as interpreted by the Commission justifying the imposition of an AAO or other deferral mechanism to record a Regulatory Liability under the Uniform System of Accounts ("USoA") in connection with GMO's retirement of Sibley Units 1, 2, and 3 and common plant?

No, decisions to retire plant-in-service are not extraordinary in nature absent very unusual and unique circumstances that are not present with the Sibley Unit 1, 2 and 3 and common plant retirements.¹

2. If the Commission determines that an AAO or other deferral accounting mechanism should be ordered in connection with GMO's retirement of Sibley Units 1, 2, and 3 and common plant how should amounts be recorded to the Regulatory Liability be quantified?

Staff has not taken a position on this issue at this time.

¹ Oligschlaeger Cross-Rebuttal, p. 2-4.

Respectfully Submitted,

/s/ Casi Aslin

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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 22nd day of July, 2019.

/s/ Casi Aslin