

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

In the Matter of the 2013 Kansas City Power & Light Company Annual IRP Update Report) **File No. EO-2013-0537**
)

**STAFF FILING OF STAFF REPORT ON KCP&L's CHAPTER 22
ELECTRIC UTILITY RESOURCE PLANNING 2013 ANNUAL UPDATE FILING**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through undersigned counsel of the Staff Counsel’s Office, and files in File No. EO-2013-0537 Staff Report On Kansas City Power & Light Company’s (“KCP&L’s”) Chapter 22 Electric Utility Resource Planning 2013 Annual Update Filing, pursuant to 4CSR 240-22.080(3)(D) of the Missouri Public Service Commission’s (“Commission’s”) rules. In support thereof, the Staff states as follows:

1. On June 20, 2013 (“KCP&L”) filed an annual update report pursuant to 4 CSR 240-22.080(3)(B) and corporate approval statement of commitment of a new preferred plan. Pursuant to 4 CSR 240-22.080(3)(B), KCP&L is required to file an annual update report with the Commission no less than 20 days prior to the annual update workshop. On July 11, 2013, KCP&L held its annual update workshop with its stakeholder group as required by 4 CSR 240-22.080(3)(B). On July 22, 2013, KCP&L filed its summary report as required by 4 CSR 240-22.080(3)(C).

2. The Staff's filing is limited to three areas where the Staff identifies instances in particular when the Company has not complied with applicable Chapter 22 rules, the Signatories' November 19, 2012 Joint Filing¹ or the Commission's December 19, 2012 *Order Regarding 2012 Integrated Resource Plan* in File No. EO-2012-0323. These instances are

¹ On November 19, 2012, KCPL, the Staff, the Office of the Public Counsel (“OPC”), the Missouri Department of Natural Resources (“MDNR”), the Natural Resources Defense Council (“NRDC”), and the Sierra Club (collectively, the “Signatories”) filed a joint filing (“Signatories’ Joint Filing”) in File No. EO-2012-0323.

(a) “acknowledgment” regarding joint Company (KCP&L and KCP&L Greater Missouri Operations Company (“GMO”)) planning, (b) joint Company planning, and (c) resource acquisition strategy selection process.

3. The Staff notes that in the Commission’s Order of Rulemaking in Case No. EX-2010-0254,² March 3, 2011, 4 CSR 240-22.080, 36 Mo.Reg. 10, pp. 1378-82, (May 16, 2011), the Commission stated in part as follows:

COMMENT #7: Clarification of Section 4 CSR 240-22080(1). Staff proposes to delete a portion of this section to clarify that Kansas City Power and Light Company (KCP&L) and Greater Missouri Operations Company (GMO), even though they are affiliated utilities, will be required to file separate Integrated Resource Plans (IRPs). The Rule will allow the utilities to file those IRPs at the same time in the same case file. Public counsel supports staff’s interpretation and modification of the section. KCP&L and GMO responded at the hearing by pointing out that requiring separate IRPs from the two (2) affiliated utilities may result in individual company plans that do not exactly coincide with the corporate strategy of the holding company that controls both utilities.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with its staff. So long as KCPL and GMO are operated as separate utilities, they should be required to file separate IRPs. The commission will modify the rule as staff requests.

WHEREFORE the Staff submits *Staff Filing Of Staff Report On KCP&L’s Chapter 22 Electric Utility Resource Planning 2013 Annual Update Filing*.

Respectfully submitted,
/s/ Steven Dottheim
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² *In the Matter of a Proposed Rulemaking Regarding Revision of the Commission’s Chapter 22 Electric Utility Resource Planning Rules.*

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Staff Filing Of Staff Report On KCP&L's Chapter 22 Electric Utility Resource Planning 2013 Annual Update Filing* have been transmitted electronically to all counsel of record this 20th day of August 2013.

/s/ Steven Dottheim