

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

In the Matter of the Application of)	
Kansas City Power & Light Company)	
For a Modification of Order Granting Variance in)	<u>File No. EO-2014-0128</u>
Case No. EO-91-224 for Good Cause Shown)	

RESPONSE TO KCP&L'S CLARIFICATION OF STAFF RECOMENDATION

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), by and through counsel, and in response to Kansas City Power & Light Company's ("KCP&L") *Clarification of Staff Recommendation* filed December 10, 2013, respectfully states:

1. In Case No. EO-91-224, the Commission issued an Order granting KCP&L a variance from Commission Rule 4 CSR 240-10.030(28) so that it could use statistical sampling as a method to determine the accuracy of meter operation rather than testing each meter.¹ On November 4, 2013, KCP&L filed the Application that initiated this case. In that Application, it requests that the Commission modify the Order in Case No. EO-91-224 to allow KCP&L to not test meters in its AMI Refresh project area in metropolitan Kansas City, Missouri, from January 1, 2014 through December 31, 2016. KCP&L explains in its Application that the project will take place in calendar years 2014, 2015 and 2016, and will entail replacing its existing meters, equipped with a Cellnet module, with new AMI meters that will be tested by the manufacturer and again by KCP&L before they are installed.

2. In response to KCP&L's Application, on December 4, 2013, Staff filed its *Staff Recommendation to Approve Modification of Order Granting Variance*, in which it recommends that the Commission approve the application of KCP&L requesting a

¹ Commission Rule 4 CSR 240-10.030(28) requires periodic testing of all induction-type meters manufactured during or after 1937, unless otherwise ordered by the Commission. In Case No. EO-91-224, KCP&L was granted a variance from the requirement to periodically test every meter and allowed to implement a method of statistical sampling techniques to measure meter accuracy.

modification from the provisions contained in the Commission's Order Granting Variance issued in Case No. EO-91-224 for "newly installed meters."

3. After discussion between Staff and KCP&L, KCP&L filed its *Clarification* stating that KCP&L's request was intended to "include all existing meters that are being replaced in addition to the newly installed meters."

4. Staff has no issue with the meters being replaced not being tested, and hereby modifies its recommendation to reflect that in addition to the newly installed meters, all existing meters that are being replaced should be exempt from testing during the three-year period in which the new AMI enabled meters are installed as a part of KCP&L's AMI Refresh project. KCP&L will continue to comply with the procedures contained in the Commission's Order Granting Variance in Case No. EO-91-224 in the remainder of its service area not part of the AMI Refresh project. Upon the completion of the project, KCP&L will resume compliance with the procedures contained in the Commission's Order Granting Variance issued in Case No. EO-91-224 for all of its meters.

WHEREFORE, Staff files its *Response* to KCP&L's *Clarification*, and recommends that the Commission approve KCP&L's request to modify its order to exempt from sample testing for meter accuracy all existing meters that are being replaced as well as newly installed meters during January 1, 2014 through December 31, 2016, in the AMI Refresh Project Area.

Respectfully Submitted,

/s/ Tim Opitz

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 11th day of December, 2013.

/s/ Tim Opitz