

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

)  
In the Matter of the Application of KCP&L Greater )  
Missouri Operations Company Containing Its )  
Semi-Annual Fuel Adjustment Clause True-Up. )  
)

**File No. ER-2015-0153**

**STAFF RECOMMENDATION**

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

1. On December 30, 2014, KCP&L Greater Missouri Operations Company ("GMO") filed an application containing its twelfth 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 12,<sup>1</sup> 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 the Commission's 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—in this case, no later than January 29, 2015.

3. As explained in Staff's *Memorandum*, attached hereto as Appendix A and incorporated herein by reference, Staff recommends the Commission approve GMO's twelfth true-up filing for Recovery Period 12, during which GMO over-recovered \$36,639

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<sup>1</sup> September 1, 2013 through August 31, 2014.

from customers in its MPS rate district, and over-recovered \$89,760 from customers in its L&P rate district.

4. Staff reviewed and analyzed the direct testimony, supporting schedules and workpapers of GMO witness Linda J. Nunn. Staff has determined that GMO's calculations for the true-up amounts for Recovery Period 12 are correct. The over-recovered amounts for the MPS and the L&P rate districts, including accumulated interest, are to be returned to customers by their inclusion in GMO's calculation of its proposed current period Fuel Adjustment Rates in its semi-annual FAC adjustment filing in File No. ER-2015-0154.<sup>2</sup>

5. Staff has verified that GMO has filed its 2013 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 Rates in its semi-annual FAC filing in File No. ER-2015-0154, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

**WHEREFORE**, Staff submits its analysis and recommends that the Commission approve GMO's twelfth true-up amounts, \$36,639 from customers in its MPS rate district, and \$89,760 from customers in its L&P rate district, for Recovery Period 12 under the provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

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<sup>2</sup> *In the Matter of KCP&L Greater Missouri Operations Company for Authority to Implement Rate Adjustments Required by 4 CSR 240-20.090(4) and the Company's Approved Fuel and Purchased Power Cost Recovery Mechanism* filed on December 30, 2014. In this case, GMO requested Commission approval of a revised tariff sheet to adjust rates for the FAC includable costs experienced during the six-month accumulation period (Accumulation Period 15) May 1, 2014 through November 30, 2014.

Respectfully Submitted,

**/s/ Whitney Payne**

Whitney Payne

Legal Counsel

Missouri Bar No. 64078

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-8706 (Telephone)

(573) 751-9285 (Fax)

[whitney.payne@psc.mo.gov](mailto:whitney.payne@psc.mo.gov)

### **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 29<sup>th</sup> day of January, 2015, to all counsel of record.

**/s/ Whitney Payne**

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
File No. ER-2015-0153  
KCP&L Greater Missouri Operations Company

FROM: Matthew J. Barnes, Utility Regulatory Auditor IV  
David Roos, Regulatory Economist III

DATE: /s/ John Rogers 01/29/2015                      /s/ Whitney Payne 01/29/2015  
Energy Resource Analysis Unit / Date      Staff Counsel's Office / Date

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

DATE: January 29, 2015

### Recommendation

Staff recommends the Commission approve KCP&L Greater Missouri Operations Company's ("GMO") twelfth true-up filing for Recovery Period 12 during which GMO over-recovered \$36,639 from customers in its MPS rate district, and over-recovered \$89,760 from customers in its L&P rate district.

### Discussion

On December 30, 2014, GMO filed with the Commission, along with direct testimony and supporting schedules by GMO witness Linda J. Nunn, its twelfth 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, GMO over-recovered from its customers in its MPS rate district \$36,639,<sup>1</sup> and over-recovered from its customers in its L&P rate district \$89,760, during Recovery Period 12 (September 1, 2013 through August 31, 2014) which followed its Accumulation Period 12 (December 1, 2012 through May 31, 2013).

The Missouri Public Service Commission Staff ("Staff") reviewed the direct testimony of GMO witness Linda J. Nunn, 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).

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<sup>1</sup> As defined on KCP&L Greater Missouri Operations Company, P.S.C.MO. No. 1, Original Sheet No. 126.2 the term T = The true-up amount shall be the difference between the revenues billed and the revenues authorized for collection during the RP as well as any corrections identified to be included in the current Fuel Adjustment Rate filing. Any corrections included will be discussed in the testimony accompanying the true-up filing.

Based on its review and analysis of the information GMO filed and submitted for Recovery Period 12, Staff has determined that GMO's calculations for the true-up amounts for Recovery Period 12, including the calculation of monthly interest, are correct. Staff recommends the Commission approve GMO's twelfth true-up filing for Recovery Period 12 during which GMO over-recovered \$36,639 from its customers in its MPS rate district, and over-recovered \$89,760 from its customers in its L&P rate district. The over-recovered amounts for the MPS and L&P rate districts, including accumulated interest, are to be returned to customers and are included in GMO's proposed changes to its current period fuel adjustment rates in its semi-annual FAC filing in File No. ER-2015-0154 filed on December 30, 2014 for Accumulation Period 15 (June 1, 2014 through November 30, 2014).

Staff has verified that GMO has filed its 2013 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-2015-0154, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.



