

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

AUG 01 2013

by  
State Corporation Commission  
of Kansas

In the Matter of Kansas City Power & Light )  
Company's Compliance with the Commission's ) Docket No. 13-KCPE-463-CPL  
Order in Docket No. 13-GIME-391-GIE. )  
)

**KANSAS CITY POWER & LIGHT COMPANY'S AUGUST 2013 RES REPORT**

Kansas City Power & Light Company ("KCP&L"), pursuant to the order of the State Corporation Commission of the State of Kansas ("Commission"), hereby files its annual Renewable Energy Standards Act report attached hereto as **Exhibit A**.

1. On December 13, 2012, the Commission initiated Docket No. 13-GIME-391-GIE ("the 391 Docket") in response to the passing of Senate Substitute for HB 2526 amending K.S.A. 66-1260 requiring, in part, the Commission to provide before March 1 of each year, an annual report on the statewide retail rate impact related to the Renewable Energy Standards ("RES").

2. In an attempt to gather the necessary information to meet its legislative mandate, the Commission, as part of the 391 Docket, directed Kansas utilities to include in all future annual RES filings a retail rate impact calculation. The Commission also directed the utilities to file in the 391 Docket updated versions of the previously submitted August 2012 RES filings. Prior to the initiation of the 391 Docket, utilities had been submitting the annual RES reports directly to Commission Staff, as the filing of the reports in a specific docket was not required.

3. On January 16, 2013, KCP&L filed in the 391 Docket its updated August 2012 RES report. Commission Staff then caused the initiation of this compliance proceeding as a mechanism to house KCP&L's confidential updated August 2012 RES report by filing in this proceeding the updated August 2012 RES report that KCP&L filed in the 391 Docket.

4. Two parties petitioned for intervention in this proceeding. The Commission denied one petition to intervene and granted limited intervention to the Citizens' Utility Ratepayer Board ("CURB"). As part of its petition to intervene, CURB included a motion for a protective order. The Commission denied CURB's request for a protective order and CURB's subsequent petition for reconsideration on the matter finding:

"The 391 Docket was opened to comply with legislative requirements that the Commission submit a report to the legislature regarding the statewide impact on retail rates of the renewable energy standard. A series of compliance dockets were opened to simply receive information submitted to the Commission for purposes of complying with this legislative requirement. For ease of administration, the Commission is adapting the compliance docket tool it has used in quasi-judicial proceedings to fulfill its reporting obligation to the legislature."<sup>1</sup>

The Commission further found that "the information filed in this docket should not be made accessible to the parties and the public but should remain confidential"<sup>2</sup>, and "public disclosure of that information as CURB advocates could retard the normal operation of markets (e.g., knowing what everyone else charges, no vendor would accept a price lower than another vendor so public disclosure could facilitate price fixing) and could also violate confidentiality agreements that utilities may have entered into with their vendors"<sup>3</sup>

5. KCP&L's 2013 RES report contains sensitive commercial information that is not available to the general public and, as such, it is being filed under seal in accordance with the provisions of K.S.A. 66-1220a and K.A.R. 82-1-221a.

Respectfully submitted,

Roger W. Steiner (MO #39586)

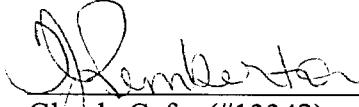
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<sup>1</sup> *Order Denying CURB's Petition for Reconsideration of the Commission's February 13, 2013 Order*, ¶12, issued Mar. 28, 2013.

<sup>2</sup> *Id.* at ¶ 11.

<sup>3</sup> *Id.* at ¶ 13.

Kansas City Power & Light Company  
1200 Main Street, 16th Floor  
Kansas City, MO 64105  
Telephone: (816) 556-2314  
Facsimile: (816) 556-2787  
[Roger.Steiner@kcpl.com](mailto:Roger.Steiner@kcpl.com)



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Glenda Cafer (#13342)  
Telephone: (785) 271-9991  
Terri Pemberton (#23297)  
Telephone: (785) 232-2123  
CAFER LAW OFFICE, L.L.C.  
3321 SW 6th Avenue  
Topeka, Kansas 66606  
Facsimile: (785) 233-3040  
[glenda@caferlaw.com](mailto:glenda@caferlaw.com)  
[terri@caferlaw.com](mailto:terri@caferlaw.com)

**COUNSEL FOR  
KANSAS CITY POWER & LIGHT COMPANY**

VERIFICATION

STATE OF MISSOURI     )  
  )  
COUNTY OF JACKSON    )

I, Carol L. Sivils, being duly sworn, on oath state that I am Regulatory Lead Analyst of Kansas City Power & Light Company, that I have read the foregoing Annual Renewable Energy Standards Act Report and know the contents thereof, and that the facts set forth therein are true and correct to the best of my knowledge and belief.

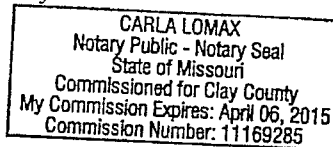
KANSAS CITY POWER & LIGHT COMPANY

By: Carol L. Sivils  
Carol L. Sivils

The foregoing Verification was subscribed and sworn to before me this 1<sup>st</sup> day of August, 2013.

Carla Lomax

Notary Public



My Commission Expires:

April 6, 2015

## CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above *RES Report* filing was served electronically by e-mail, hand-delivered or mailed, postage prepaid, this 1st day of August, 2013 to:

DAVID SPRINGE, CONSUMER COUNSEL  
NIKI CHRISTOPHER, ATTORNEY  
C. STEVEN RARRICK, ATTORNEY  
DELLA SMITH  
SHONDA SMITH  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604

JAY VAN BLARICUM, ADVISORY COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604-4027

  
\_\_\_\_\_  
GLENDIA CAFER  
TERRI PEMBERTON

**EXHIBIT A  
CONFIDENTIAL AND  
REDACTED**

The information contained in this exhibit is confidential commercial information not subject to public dissemination by order of the State Corporation Commission of the State of Kansas

# CAFER LAW OFFICE, L.L.C.

3321 SW Sixth Avenue  
Topeka, Kansas 66606  
caferlaw.com

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Glenda Cafer  
(785) 271-9991  
(785) 233-3040 fax  
glenda@caferlaw.com

Terri Pemberton  
(785) 232-2123  
(785) 233-3040 fax  
terri@caferlaw.com

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August 1, 2013

Ms. Kim Christiansen  
Executive Director  
Kansas Corporation Commission  
1500 S.W. Arrowhead Drive  
Topeka, Kansas 66604

Re: Kansas City Power & Light Company (KCP&L)  
Submittal Pursuant to K.A.R. 82-16-2(b)  
Electric Renewable Energy Standards

Received  
on

AUG 01 2013

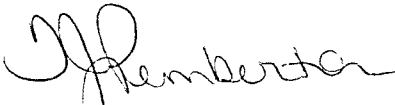
by  
State Corporation Commission  
of Kansas

Dear Ms. Christiansen:

Pursuant to the requirements of K.A.R. 82-16-2(b), KCP&L hereby submits its annual report to the Commission detailing KCP&L's compliance with the portfolio standards established by the Renewable Energy Standards Act.

Please note that this report is marked "Confidential," as it contains sensitive commercial information that is not available to the general public. Please handle accordingly.

Sincerely,



Terri Pemberton  
Counsel for KCP&L

Enc.

cc: Mary Turner