

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of )  
Kansas City Power & Light Company's ) File No. ER-2012-0174  
Request for Authority to Implement )  
a General Rate Increase for Electric Service )

**SIERRA CLUB STATEMENT OF POSITION**

Comes now Sierra Club and provides the following Statement of Position. Sierra Club takes a position only on Issue 9.

9. **Resource Planning—La Cygne and Montrose:** (GMO: Rush, Crawford; Sierra Club: Biewald) Should the Sierra Club's recommendations regarding the La Cygne and Montrose investments be adopted?

**SIERRA CLUB POSITION:**

Yes. KCP&L has an obligation to conduct prudent planning with regard to the La Cygne and Montrose investments, and that obligation is ongoing during the construction period. The La Cygne and Montrose investments warrant scrutiny, especially in light of significantly changed conditions in natural gas prices and energy markets in the last one to two years. The Commission should indicate in this proceeding that it intends to take a close look at the prudence of KCP&L emission control investments and begin to define what will be required in order for it to make an appropriately informed decision about prudence and rate recovery in the eventual rate case proceeding in which the Company requests inclusion of the investments in rates. This would assist the Company and

interested stakeholders in ensuring that KCP&L does not create a situation where either ratepayers or company shareholders would be unnecessarily at risk for uneconomic investments in aging coal unit

/s/ Henry B. Robertson

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**Certificate of Service**

I certify that the foregoing was served electronically on all parties of record this 12th day of October, 2012.

/s/ Henry B. Robertson  
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