

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

In the Matter of the Application of)	
Great Plains Energy Incorporated for)	
Approval of its Acquisition of)	<u>File No. EM-2017-0226, et al.</u>
Westar Energy, Inc.)	

**POSITION STATEMENT OF GREAT PLAINS ENERGY, KANSAS CITY POWER &
LIGHT COMPANY AND KCP&L GREATER MISSOURI OPERATIONS COMPANY**

COME NOW Great Plains Energy Incorporated (“GPE”), Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) and in accordance with the procedural schedule adopted by the Commission hereby offer their position statement on the issues in this proceeding:

- I. Should the Commission find that GPE’s acquisition of Westar is not detrimental to the public interest, and approve the transaction?

GPE/KCP&L/GMO Position: Yes, GPE has met its burden of establishing that there is no detriment to the public interest if the Commission approves GPE’s acquisition of Westar, subject to the terms, conditions and commitments identified in Issue II below. The competent and substantial evidence supports a finding by the Commission that the benefits attendant to the acquisition outweigh any possible detriments, particularly given that the terms, conditions and commitments identified in Issue II below mitigate any possible risks that the transaction would diminish the provision of safe and adequate service or that would tend to make retail rates paid by Missouri customers less just or less reasonable.

- II. Should the Commission condition its approval of GPE's acquisition of Westar and, if so, how?

GPE/KCP&L/GMO Position: Yes, the Commission should approve the acquisition subject to the terms, conditions and commitments set forth in the Stipulation and Agreement between GPE, KCP&L, GMO and Staff and in the Stipulation and Agreement between GPE, KCP&L, GMO and OPC as well as the additional commitments proposed by GPE, KCP&L and GMO that are found in Schedule DRI-4 to Mr. Ives' surrebuttal testimony.

- III. Should the Commission address matters such as transmission and power supply services and, if so, how?

GPE/KCP&L/GMO Position: No, wholesale transmission and power supply services are FERC jurisdictional and outside the jurisdiction and authority of this Commission.

- IV. Should the Commission grant the limited request for variance of the affiliate transaction rule requested by GPE, KCP&L and GMO?

GPE/KCP&L/GMO Position: Yes, the Commission should grant the limited request for variance of the affiliate transaction rule because the competent and substantial evidence establishes good cause in that the variance is needed to enable the attainment of savings post-acquisition that will ultimately benefit customers of GPE's utility companies in Missouri and Kansas and that the acquisition will not be detrimental to the public interest in Missouri given the level of acquisition-related savings and the terms, conditions and commitments proposed by GPE, KCP&L and GMO, as well as Staff and OPC, as discussed in issue II above.

- V. Should the Commission condition its approval of GPE's limited request for variance of the affiliate transaction rule requested by GPE, KCP&L and GMO and if so, how?

GPE/KCP&L/GMO Position: Yes, the Commission should approve the limited request for variance of the affiliate transaction rule subject to the terms, conditions and commitments proposed by GPE, KCP&L and GMO, as well as Staff and OPC, as discussed in issue II above.

WHEREFORE, GPE, KCP&L and GMO submit their position statement.

Respectfully submitted,

/s/ Robert J. Hack

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**Counsel for Great Plains Energy Incorporated,
Kansas City Power & Light Company, and
KCP&L Greater Missouri Operations Company**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served upon all counsel of record on this 30th day of March 2017, by either e-mail or U.S. Mail, postage prepaid.

/s/ Robert J. Hack
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