

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

|                                                |   |                                |
|------------------------------------------------|---|--------------------------------|
| In the Matter of a Determination of Special    | ) |                                |
| Contemporary Resource Planning Issues to be    | ) |                                |
| Addressed by KCP&L-Greater Missouri            | ) | <b>Docket No. EO-2017-0075</b> |
| Operations Company in its Next Triennial       | ) |                                |
| Compliance Filing or Next Annual Update Report | ) |                                |

**JOINT SUGGESTIONS FOR SPECIAL CONTEMPORARY PLANNING ISSUES  
OF BRIGHTERGY, LLC AND THE NATURAL RESOURCES DEFENCE COUNCIL**

COMES NOW Brightergy, LLC (“Brightergy”) and the Natural Resources Defense Council (“NRDC”) and for their Joint Suggestions in response to the Commission’s September 9, 2016 *Order Opening a File Regarding Special Contemporary Resource Planning Issues and Offering an Opportunity to File Suggestions*, regarding KCP&L-Greater Missouri Operations Company (“GMO”) respectfully states the following:

1. Brightergy is a limited liability company organized under the laws of the State of Missouri with its principal place of business at 1712 Main Street, 6th Floor, Kansas City, MO, 64108.
2. NRDC is a nonprofit corporation organized under the laws of New York with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL, 60606. NRDC has more than 4,800 members in Missouri as of this date.
3. NRDC and Brightergy share common interests in this docket that are reflected in this Joint Response.
4. The purpose of the special contemporary issues lists is to ensure that evolving regulatory, economic, financial, environmental, energy, technical, or customer issues are adequately addressed by each utility in its electric resource planning.<sup>1</sup>
5. Pursuant to Commission Rule 4 CSR 240-22.080(4), Brightergy and NRDC suggest the following special contemporary issues:

---

<sup>1</sup> 4 CSR 240-22.080(4)

- a. Review the effectiveness of the MEEIA Cycle II program thus far.
- b. Analyze GMO's ability to achieve energy efficiency savings of at least 1.5% annually.
- c. Study feasibility of providing all customers with interval meter data. Review the options available to provide customers with real-time, building level data, sub-meter, line and device level data.
- d. Review plans to make Time of Use rates available to all customers.
- e. Analyze GMO's plans to reduce reliance on coal as a fuel source.
- f. Discuss plans to increase deployment of distributed generation resources, including, but not limited to, net metering limitations, interconnection procedures, and billing practices for solar customers.
- g. Describe any studies or other investigations of the value of solar used by GMO.

**WHEREFORE**, Brightergy and NRDC suggest that in its November 1, 2016 Order, the Commission specifies each of the issues above for GMO to address in its next annual update report.

Respectfully submitted,  
/s/ Andrew Zellers  
Andrew Zellers MO. Bar No. 57884  
General Counsel and Vice President for Regulatory Affairs  
Brightergy, LLC  
1712 Main Street, 6th Floor, Kansas City, MO 64108  
andy.zellers@brightergy.com  
office: +1.816.866.0555  
fax: +1.888.511.0822

**Attorney for Brightergy, LLC**

/s/ Henry B. Robertson  
Henry B. Robertson  
Great Rivers Environmental Law Center  
319 N. Fourth Street, Suite 800  
St. Louis, MO, 63102  
(314) 231-4181  
(314) 231-4184 (facsimile)  
hrobertson@greatriverslaw.org

**Attorney for the Natural Resources Defense Council**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically this 15th day of September, 2016, to all parties on the Commission's service list in this case.

/s/ Andrew Zellers