

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

In the Matter Application of KCP&L)	
Greater Missouri Operations Company's)	
Request for Authority to Implement a General)	Docket No. ER-2016-0156
Rate Increase for Electric Service)	

STATEMENT OF POSITION OF BRIGHTERGY, LLC

COMES NOW Brightergy, LLC ("Brightergy") and for its Statement of Position states the following:

1. Brightergy takes the position that so-called Time of Use ("TOU") rates should not be frozen, and should remain an option for eligible customers. TOU tariffs encourage customers to shift their electrical usage to off-peak hours at a lower rate.
2. As noted in Jessica Oakley's Direct Testimony in this docket, permitting TOU rates should have no impact on rates in other customer classes, leaving no disadvantages to allowing the tariffs to stay in place.
3. By shifting usage to off-peak hours, all ratepayers will benefit by reducing load during peak demand, with a corresponding reduction in need for peak generation. Further, TOU rates will encourage ratepayers to invest in energy management solutions, such as programmable thermostats and other smart technologies.
4. In consideration of the potential benefits and lack of disadvantages, the Commission should require all utilities to offer TOU tariffs.

Respectfully submitted,

/s/ Andrew Zellers

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served electronically this 9th day of September, 2016, to all parties on the Commission's service list in this case.

/s/ Andrew Zellers