



Law Department

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July 24, 2015

Ms. Natelle Dietrich
Director-Tariff, Safety, Economic, and Engineering Analysis
Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65101

Re: *Missouri Energy Efficiency Investment Act ("MEEIA") Rule Review*
Case No. EW-2015-0105

Dear Natelle:

Thank you for the opportunity to comment upon the draft of the MEEIA rules. Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (collectively, the "Company") have participated in the review process and note that the comments in your draft reflect that participation. The Company has no comments for Staff's July 24, 2015 comment deadline but may have additional comments in the future. The Company does not believe that the draft rules are ready for Commission review and submission as a formal rulemaking as evidenced by Staff's extensive list of unresolved issues and items where no consensus has been reached.

In addition, the Company has not had an opportunity to comment on the Office of the Public Counsel's ("OPC") rule suggestions. The Company does not agree with OPC's changes and they should not be included in the rule.

The MEEIA rules as they are currently structured and administered are not conducive to long term sustainable investment in energy efficiency and demand side management initiatives because these expenditures do not generate earnings and lost revenue recovery is uncertain at best. The Company does not believe that these issues are being addressed by the draft rule. To address these concerns the Company and other utilities may propose their own draft rule.

Sincerely,

/s/ Roger W. Steiner

Roger W. Steiner

RWS/naw