

**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 Merger with) File No. EM-2018-0012
Westar Energy, Inc.)

INITIAL BRIEF OF MECG

I. Should the Commission find that GPE’s merger with Westar is not detrimental to the public interest, and approve the merger?

Position: Yes, subject to the conditions set forth in the testimony of the Joint Applicants, as well as those agreed to in the January 12, 2018 and March 8, 2018 Stipulation and Agreements, the Commission should find that the merger is not detrimental to the public interest.

II. Should the Commission condition its approval of GPE’s merger with Westar and, if so, how?

Position: In its rebuttal testimony, MECG suggested several conditions which would alleviate the detrimental nature of the GPE / Westar merger. Several of those conditions have been reflected in the March 8, 2018 Stipulation and Agreement. Specifically, that Stipulation provides limitations on the amount of transition costs to be recovered from ratepayers. Furthermore, consistent with the Commission’s findings in Case No. EC-2017-0107, the Joint Applicants have agreed to seek Commission approval of any future mergers and acquisitions. Additionally, in the event that the names of KCPL and GMO are changed in the future, the Joint Applicants have agreed to clearly label customer bills so that customers may understand the identity of their service provider. Finally, consistent with the condition offered by MECG, KCPL and GMO have proposed programs, in the context of the pending rate cases, for non-residential access to renewable energy. The Commission should approve these conditions as well as other conditions contained in the Joint Applicants’ testimony and the January 12, 2018 and March 8, 2018 Stipulation and Agreements.

III. Should the Commission grant the limited request for variance of the affiliate transaction rule requested by Applicants?

Position: Yes, subject to all of the conditions identified in the January 12, 2018 and March 8, 2018 Stipulation and Agreements, the Commission should grant the limited request for variance of the affiliate transaction rule.

IV. How should the bill credits proposed by Applicants be allocated between and within the various KCP&L and GMO rate classes?

Position: The Commission should allocate bill credits between and within the KCPL and GMO rate classes in a manner provided in the March 8, 2018 Stipulation and Agreement.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.



David L. Woodsmall

Dated: March 30, 2018