

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

In the Matter of Kansas City Power & Light)
Company’s Notice of Intent to File an)
Application for Authority to Establish a Demand-) File No. EO-2015-0240
Side Programs Investment Mechanism)

In the Matter of KCP&L Greater Missouri Operations)
Company’s Notice of Intent to File an)
Application for Authority to Establish a Demand-) File No. EO-2015-0241
Side Programs Investment Mechanism)

**KANSAS CITY POWER & LIGHT COMPANY AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY’S
POSITION STATEMENT**

COME NOW Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (collectively, the “Company”), by and through undersigned counsel, and hereby files the Company’s Position Statement, stating as follows:

- A. Should the Missouri Public Service Commission (“Commission”) approve the Missouri Energy Efficiency Investment Act (“MEEIA”) Cycle 2 programs and demand-side programs investment mechanism as agreed on in the joint position and articulated in the Non-Unanimous Stipulation and Agreement Resolving MEEIA Filings filed November 23, 2015 (“Stipulation”)?

Company position: Yes. The Company requests the Commission approve the Stipulation so that the Cycle 2 programs and the demand-side investment mechanism (“DSIM”) can be put into place by the Company. The Cycle 2 programs and DSIM aligns the interests of the Company and its customers in advancing beneficial demand-side programs. Retrospective evaluation measurement and verification (EM&V) will be used to determine energy savings that actually occurred. The Company’s Cycle 1 programs have expired and the Stipulation should be approved so that all customers can benefit from the Cycle 2 programs.

- B. Should the Commission approve the Commercial and Industrial (“C & I”) Custom Rebate program in the Stipulation over the objection of Brightergy, LLC (“Brightergy”)?

Company position: Yes. The Company has proposed a flat rate incentive and a cap for the C&I Custom Rebate program. These changes to the Cycle 2 Custom Rebate program were carefully evaluated by the Company and reviewed by stakeholders. The Company believes that these changes allow incentives to be applied in a more equitable manner and keeps the rebates in line with those of neighboring utilities. The C & I Custom Rebate program also provides for flexibility which allows the Company to change the rebate if participation needs to be further incented.

- C. Should the Commission approve the regulatory flexibility provisions in the Stipulation over the objection of Brightergy?

Company position: Yes. The regulatory flexibility provisions recognize that MEEIA programs are voluntary on the part of the Company. The provisions also recognize the uncertainty surrounding the MEEIA recovery process and energy efficiency investments. Under the Stipulation, the Company is permitted, upon 30 days' notice, to discontinue all MEEIA programs if it determines that circumstances have materially negatively impacted the economic viability of the programs. Additionally, if the Company exercises the regulatory flexibility provisions and terminates all MEEIA programs, the Company will forego all earnings opportunities in connection with those programs. This condition ensures that the Company will carefully evaluate any decision to exercise the regulatory flexibility provisions and cannot terminate all MEEIA programs for a non-material reason.

Respectfully submitted,

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Kansas City Power & Light Company and
KCP&L Greater Missouri Operations Company

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 6th day of January, 2016 to all counsel of record in this proceeding.

/s/ Roger W. Steiner

Roger W. Steiner