

**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)

POSITION STATEMENT OF NRDC

Comes now the Natural Resources Defense Council ("NRDC"), and states its position on the issues in these cases 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")?

Yes. The stipulation and agreement was the result of extensive negotiation between the parties and should not be derailed because of a single objection by one party to the narrow issue of the incentive level for a single program.

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

Yes. Even if Brightergy's position has some merit, the incentive in the non-unanimous stipulation and agreement is supported by the Navigant potential study and the company's IRP,

as detailed in testimony of Staff and the company. Rejection of the MEEIA plan on this ground alone is not justified.

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

The Commission should approve this as a term of the MEEIA Program Cycle 2 plan.

/s/ Henry B. Robertson
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 6th day of January, 2016, to all counsel of record:

/s/ Henry B. Robertson
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