

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

In the Matter of Kansas City Power & Light Company's)
Request for Authority to Implement a General Rate) Case No. ER-2018-0145
Increase for Electric Service)

In the Matter of KCP&L Greater Missouri Operations)
Company's Request for Authority to Implement a) Case No. ER-2018-0146
General Rate Increase for Electric Service)

**STATEMENT OF POSITION ON THE ISSUES OF
THE MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION**

The Missouri Joint Municipal Electric Utility Commission (MJMEUC), pursuant to the Commission's March 13, 2018 Order Granting Motion to Consolidate and Order Setting Procedural Schedule, hereby respectfully submits its Statement of Position on the Issues as follows:

III.c.i – Rate Design/Class Cost of Service, Non-Residential Rate Design: What Rate Designs should be ordered for each utility's non-residential classes?

MJMEUC's Position: MJMEUC does not currently take a position on this issue, but reserves the right to take a position at any time prior to the close of the record in these matters.

IV.c – Tariffs, Real Time Pricing: Should the Commission eliminate or unfreeze each utility's Real Time Pricing Tariffs?

MJMEUC's Position: MJMEUC is one of the six current owners of the Dogwood Energy Facility located in Pleasant Hill, Cass County, Missouri. The January 30, 2018 direct testimony submitted by the Companies' witness Marisol Miller erroneously claimed that no customers are served under this Real Time Pricing (RTP) Tariff. In truth, Dogwood is both a KCP&L-GMO customer and supplier of wholesale power served under this RTP Tariff. Therefore, MJMEUC

accepts the September 14, 2018 surrebuttal testimony of the Companies’ witness Marisol Miller as evidence that the Companies have now withdrawn their initial request for authority to eliminate this RTP Tariff. Ms. Miller now states specifically, “GMO will include in its direct filing in its next rate case or rate design case a study of ...Real Time Pricing...GMO will propose rates based on this study no later than its next rate case or rate design case.” MJMEUC states that it is in the public interest for this Tariff to remain active and unaltered.

V.a – Riders, Renewable Energy Rider: Should the Commission order implementation of a renewable energy rider for each utility? If so, should the unsubscribed energy flow through each utility’s FAC, or should any other recommendations made by parties be adopted?

MJMEUC’s Position: MJMEUC does not currently take a position on this issue, but reserves the right to take a position at any time prior to the close of the record in these matters.

With regard to Issues **I.a and b; II; III.a.i, b.i – iv; IV.a – b, d – e; V.b – c; VI; VII.a – b; and VIII: MJMEUC takes no position.**

WHEREFORE, MJMEUC prays that the Commission will accept its Statement of Position on the Issues.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for these cases on this 19th day of September, 2018.

/s/ Peggy A. Whipple
Peggy A. Whipple