

**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)

**JOINT POSITION STATEMENT OF THE NATIONAL
HOUSING TRUST AND WEST SIDE HOUSING ORGANIZATION**

Comes now the National Housing Trust (“NHT”) and West Side Housing Organization (“West Side”) (collectively “the Housing Parties”) and state their position on the issues in the above-styled 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 Non-Unanimous Stipulation and Agreement filed in this case resulted from many rounds of negotiations and represents meaningful compromises between the parties. Its approval will significantly advance energy efficiency in the service territories of Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”), in particular for tenants and owners of affordable multifamily housing.

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

Yes. NHT and West Side do not believe a lower minimum incentive level should preclude the Commission from approving the Companies' plans as reflected in the Stipulation and Agreement. Moreover, it is the position of the Housing Parties that the Companies retain the flexibility to raise incentive levels should it later determine them to be insufficient for achieving desired participation. Accordingly, rejection of the MEEIA plan on the grounds of Brightergy's objection is not justified.

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

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

Respectfully Submitted,

/s/ Andrew J. Linhares

Andrew J. Linhares, # 63973

910 E. Broadway, Ste. 205

Columbia, MO 65201

(314) 471-9973 (T)

(314) 558-8450 (F)

Andrew@renewmo.org

ATTORNEY FOR THE NATIONAL
HOUSING TRUST AND WEST SIDE
HOUSING ORGANIZATION

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/ Andrew J. Linhares

Andrew J. Linhares