

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

In the Matter of Kansas City Power & Light )  
Company's Request for Authority to ) **Docket No. ER-2014-0370**  
Implement a General Rate Increase for )  
Electric Service )

**BRIGHTERGY, LLC STATEMENT OF POSITION**

COMES NOW Brightergy, LLC ("Brightergy") and by and through its attorney states the following as its Statement of Position:

On June 9, 2015, the Staff of the Missouri Public Service Commission filed its List of Issues, Order of Witnesses, Order of Cross-Examination and Order of Opening Statements. Brightergy states its position as follows in regard to the Clean Charge Network issues in this docket, but reserves the right to modify, change or add to its Statement as further evidence is presented. Regarding those issues for which Brightergy does not state a position, it reserves the right to declare a position at a later date.

**Clean Charge Network A. Should all issues associated with KCPL's Clean Charge Network be considered in a separate case, and not considered in this case?**

Brightergy's position is that this is an appropriate docket for the Commission to consider and permit the costs of the Clean Charge Network to be recovered in rate base. There is ample evidence to support a Commission decision to allow KCP&L to recover the costs of the pilot program. However, as Adam Blake noted in his Surrebuttal Testimony, Brightergy does support the opening of a workshop to investigate electric vehicle policy in the State of Missouri.

**B. Is the Clean Charge Network a public utility service?**

Yes, the Network is a public service, but that is not the end of the inquiry. Brightergy supports KCP&L's recovery of costs for this pilot program, but the Commission should continue to study the issues raised in Brightergy's Surrebuttal Testimony, including how to utilize rate structures to encourage charging at off-peak hours, line extension policies for EV stations, interaction between utilities and third parties that own charging stations, utilization of EV's as energy storage, EV's role in demand response, and the development of safety standards.

**C. If so, who pays for it?**

As it relates to the pilot program, it should be paid for through specific cost-based rates. Brightergy supports KCP&L's request that Nissan and the host sites with which the utility partners shall pay for the electricity consumed by the end-use charging station users at standard tariff rates.

The Commission can use the broader workshop as an opportunity to examine how the electricity will be paid for, and what entities will be allowed to sell power through the charging stations.

WHEREFORE, Brightergy respectfully submits its Statement of Position in this matter.

Dated June 9, 2015

Respectfully submitted,

/s/ Andrew J. Zellers

Andrew J. Zellers #57884

General Counsel/Vice President for Regulatory Affairs

Brightergy, LLC

1712 Main Street, 6th Floor

Kansas City, MO, 64108

(816) 866-0555 Telephone

(816) 511-0822 Fax

Email: [andy.zellers@brightergy.com](mailto:andy.zellers@brightergy.com)