

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

In the Matter of the Application of Great)
Plains Energy Incorporated for Approval) File No. EM-2018-0012
of its Merger with Westar Energy, Inc.)

**RENEW MISSOURI’S OBJECTION TO STIPULATION AND AGREEMENT
AND RESPONSE TO COMMISSION ORDER DIRECTING FILING**

COMES NOW Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”) and, pursuant to Commission Rule 4 CSR 240-2.115(2)(B), files its objection to the Stipulation and Agreement filed on March 8, 2018 by Great Plains Energy Incorporated (“GPE”), Kansas City Power & Light Company (“KCP&L”), KCP&L Greater Missouri Operations Company (“GMO”), and Westar Energy, Inc. (“Westar”) (collectively, the “Applicants”), the Staff of the Missouri Public Service Commission (“Staff”), Brightergy, LLC (“Brightergy”), Missouri Joint Municipal Electric Utility Commission (“MJMEUC”), the Office of the Public Counsel (“OPC”), and Midwest Energy Consumers Group (“MECG”). In addition to filing this objection, Renew Missouri responds to the Commission’s Order Directing Filing.

Objection

1. To gain Commission approval of their proposed merger, the Applicants must demonstrate the merger is not detrimental to the public interest (Commission Rule 4 CSR 240-3.115; Report and Order, Case No. EC-2017-0107 at p. 22).
2. For its part, Renew Missouri pre-filed the testimony of Karl R. Rábago who discussed his concern whether the proposed merger would have a detrimental impact on the progress of clean energy development and utilization, the retirement of older fossil-fuel generation, efficient use of energy, grid modernization, and customer opportunities for investing in and benefitting from

distributed energy resources, including distributed generation, green power, energy efficiency, energy management, energy storage, and other technologies and services (Doc. No. 52).

3. The Stipulation and Agreement filed by the Applicants today fails to address any of the foregoing concerns related to clean energy development and resource utilization raised by Renew Missouri, and so, Renew Missouri files this objection.

4. Commission Rule 4 CSR 240-2.115(2)(D) requires that “[a] non-unanimous stipulation and agreement to which a timely objection has been filed shall be considered to be merely a position of the signatory parties to the stipulated position, except that no party shall be bound by it. All issues shall remain for determination after hearing.”

Response to Commission Order Directing Filing

5. The Commission’s March 8, 2018 Order directed parties to comment on the issues remaining for hearing. Renew Missouri has objected to the Stipulation and Agreement filed by the Applicants and so all issues remain for determination by rule. However, Renew Missouri did not take a position on Issue IV on the joint list of issues. Therefore, Renew Missouri believes the remaining issues for Commission determination are:

- I. Should the Commission find that GPE’s merger with Westar is not detrimental to the public interest, and approve the merger?
- II. Should the Commission condition its approval of GPE’s merger with Westar and, if so, how?
- III. Should the Commission grant the limited request for variance of the affiliate transaction rule requested by Applicants?

WHEREFORE, Renew Missouri respectfully files its objection to the Stipulation and Agreement filed on March 8, 2018 and offers its response to the Commission’s Order Directing Filing.

Respectfully Submitted,

/s/ Tim Opitz

Tim Opitz, Mo. Bar No. 65082
409 Vandiver Drive, Building 5, Ste. 205
Columbia, MO 65202
T: (402) 943-7938
F: (573) 303-5633
tim@renewmo.org

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 8th day of March 2018:

/s/ Tim Opitz
