

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) File No. EO-2019-0132
Application for Authority to Establish a Demand-)
Side Programs Investment Mechanism)

NRDC'S POSITION STATEMENT

Comes now the Natural Resources Defense Council ("NRDC"), and states:

1. Should the Commission approve, reject, or modify the Company's MEEIA Cycle 3 Plans ("MEEIA 3"), along with the waivers in the Company's application intended to enable its implementation?

POSITION: The Commission should approve the Application and waivers.

- a. If MEEIA 3 should be modified, how should the plans be modified?

POSITION: The Commission should order the Company to add to its portfolios the Income Eligible Multi-Family program outlined by NRDC and National Housing Trust, and the discontinued Income Eligible Single Family program as proposed by NRDC witness Mosenthal.

2. When it developed MEEIA 3, did the Company value demand-side investments equal to traditional investments in supply and delivery infrastructure?

POSITION: Yes. The Portfolios' TRC scores show that the marginal cost to run existing power plants would be almost twice as much as achieving the same results through MEEIA Cycle 3. Staff erroneously believes that equal valuation can only mean comparison to a new supply-side capital investment. This ignores the benefits of avoided generation costs, the displacement of high-cost generation,

and earlier retirement of non-economical generating units.

3. Is the proposed MEEIA 3, as designed by the Company, expected to provide benefits to all customers in the customer class in which the programs are proposed, regardless of whether the programs are utilized by all customers?

POSITION: Yes. Cost-effective efficiency lowers costs for non-participant customers even with excess capacity. Efficiency is the least-cost resource and will displace more expensive supply-side alternatives if the TRC test is met.

4. If the Commission approves or modifies MEEIA 3, what DSIM provisions should be approved to align recovery with the MEEIA statute?

NRDC takes no position on this issue.

5. Should Opt-Out Customers be eligible to participate in Business Demand Response programs?

- a. MECG sub issue: “Should GMO be required to publish in its tariff the participation payment to customers that participate in the Business Demand Response programs?”

NRDC takes no position on these issues.

/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 18th day of September, 2019, to all counsel of record.

/s/ Henry B. Robertson
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