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- Side Programs Investment Mechanism)))	File No. EO-2015-0240
In the Matter of KCP&L Greater Missouri Operations Company's Notice of Intent to File an Application for Authority to Establish a Demand- Side Programs Investment Mechanism)))	File No. EO-2015-0241

POSITION STATEMENT OF RENEW MISSOURI

Comes now Earth Island Institute d/b/a Renew Missouri ("Renew Missouri"), and states its 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").

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

Yes. Renew Missouri is sensitive to Brightergy's concern for ensuring that the incentive level is sufficient to achieve high enough participation. However, we 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 Renew Missouri's position 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

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ATTORNEY FOR EARTH ISLAND INSTITUTE d/b/a RENEW MISSOURI

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 <u>6th</u> day of January, 2016, to all counsel of record:

/s/ Andrew J. Linhares Andrew J. Linhares