

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

In the Matter of Kansas City Power & Light)
Company’s Request for Authority to)
Implement a General Rate Increase for)
Electric Service) ER-2016-0285

**STATEMENT OF POSITION
OF RENEW MISSOURI**

COMES NOW, Renew Missouri Advocates (“Renew Missouri”), by and through its undersigned counsel, and for its Statement of Position in this case states the following:

Issue I: Commission Raised Issues

Sub-issue A: Installation of AMI smart meters for residential and commercial customers

Position: Renew Missouri generally supports the installation of AMI smart meters for residential and commercial customers. AMI meters have the potential to enable usage of customer data in ways that benefit the grid, such as reducing peak demand, allowing time-of-use rates, accurately measures energy savings, and reducing utility administrative costs. If the benefits of AMI meter deployment outweigh the costs, Renew Missouri supports their widespread installation and utilization.

Sub-issue B: Plug-In Electric Vehicle Rate

Position: Renew Missouri generally supports efforts to develop and propose rates to encourage the purchase of Electric Vehicles (EVs), as well as rates that encourage EV owners to charge their vehicles during off-peak hours in order to decrease load factor and reduce peak demand.

Sub-issue C: Operational Residential Time-of Use rates (hourly) and Time-of-Day rates.

Position: Per our witness Douglas Jester, Renew Missouri supports the implementation of optional Residential Time-of Use rates (hourly) and Time-of-Day rates in the near future in Missouri. Time-of-use rates follow the principal of cost causation ratemaking. Additionally, time of use rates may incentivize reductions in peak usage thereby reducing overall costs and increasing customer welfare.

Sub-issue D: PACE-Property Assessed Clean Energy Programs

Position: Renew Missouri generally supports the proliferation of PACE financing programs by Missouri municipalities and counties, and we support their integration with utility-sponsored energy efficiency and demand-side management programs. PACE presents a unique method of financing cashflow-positive energy efficiency improvements for both the residential and C&I sectors that benefits the property owner, the lender, and all utility customers.

Sub-issue E: PAYS-Pay As You Save Programs

Position: Renew Missouri generally supports the PAYS model, along with other on-bill financing models as a method of increasing investment in energy efficiency for homeowners and businesses.

Sub-issue F: Infrastructure Efficiency Tariff

Position: Renew Missouri takes no position on this issue at this time.

Issues II through XX:

Position: Renew Missouri takes no position on issues II through XX at this time.

Issue 21: Rate Design/Class Cost of Service

Sub-issue A: What interclass shifts in revenue responsibility, if any should the Commission order in this case?

Position: Renew Missouri takes no position on this issue at this time.

Sub-issue B: How should any increase ordered in this case be applied to each class?

Position: Renew Missouri takes no position on this issue at this time.

Sub-issue C: Should KCPL be permitted to increase the fixed customer charge on residential customers?

Position: Per our witness Douglas Jester, Renew Missouri opposes any increase in the fixed charge. Increases in the fixed charges reduce the ability of consumers to control their bills through conservation and investment in distributed generation and demand-side management measures. Additionally, higher fixed customer charges disproportionately affect lower income customers and apartment dwellers.

Sub-issue D: Should KCPL be required to implement the block rate structure proposed by Division of Energy for residential customers?

Position: Per our witness Douglas Jester, Renew Missouri supports the proposal of the Division of Energy for a residential Inclining Block Rate structure, as seen in witness Martin Hyman's Direct Testimony. Our witness Douglas Jester explains how inclining block rates are superior to flat or declining block rates because they better reflect cost causation and incentivize energy efficiency. Additionally, declining block rates unfairly shift the burden of higher marginal cost electricity onto lower income and lower use customers. Renew Missouri seeks a Commission Order in this case requiring KCP&L to implement a flat rate in the winter and an inclining block rate in the summer for its residential customers.

Sub-issue E: Should KCPL be required to propose time-varying rate offerings for residential customers in future cases?

Position: Per our witness Douglas Jester, we would support the implementation of Optional Residential Time-of Use rates (hourly) and Time-of-Day rates. Time of use rates follow the principal of cost causation ratemaking. Additionally, time of use rates incentivize reductions in peak usage thereby reducing overall costs and increasing customer welfare.

Sub-issue F: How should any increases to Rates LGS and LPS be distributed?

Position: Renew Missouri takes no position on this issue at this time.

Issues XXII through XXVII:

Position: Renew Missouri takes no position on these issues at this time.

Respectfully Submitted,

/s/ Andrew J. Linhares

Andrew J. Linhares, # 63973

1200 Rodgers Dr, Suite B

Columbia, MO 65201

T: (314) 471-9973

F: (314) 558-8450

Andrew@renewmo.org

ATTORNEY FOR RENEW MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was mailed, faxed, or emailed to all counsel of record on this 2nd day of February 2017.

/s/ Andrew J. Linhares _____
Andrew J. Linhares