

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

In the Matter of the Application of KCP&L Greater	)	
Missouri Operations Company for Permission and	)	File No. EA-2015-0256
Approval of a Certification of Public Convenience and	)	
Authorizing it to Construct, Install, Own, Operate,	)	
Maintain and Otherwise Control and Manage Solar	)	
Generation Facilities in Western Missouri.	)	

**STATEMENT OF POSITION OF RENEW MISSOURI  
AND MOTION TO LATE FILE**

COMES NOW, Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”),  
pursuant to the Commission’s January 27, 2016 Order, and for its Statement of Position in this  
case, states the following:

Issue 1: *Does the evidence establish that the Solar Generation project as described in GMO’s applications in this docket and for which GMO is seeking a certificate of convenience and necessity (“CCN”), is “necessary or convenient for the public service” within the meaning of section 303.170, RSMo?*

Although evidence is somewhat limited in this case, Renew Missouri believes the evidence is sufficient to establish that the project described in GMO’s application is “necessary or convenient for the public service,” within the meaning of section 303.170, RSMo. In addition, the substantial and growing demand for solar energy in GMO’s service territory and the state of Missouri demonstrates that GMO’s project is an attempt to meet the demands and preferences of the utility’s customers.

Issue 1a: *Does the evidence establish that there is a need for the project?*

Renew Missouri believes that the need for this project is established by the existence of a number of clean energy requirements with which GMO is obligated to comply, including but not limited to 1) federal emissions requirements due to the EPA’s Clean Power Plan, and 2)

Missouri's Renewable Energy Standard, requiring investor-owned utilities to achieve 15% renewable energy by 2021.

Issue 1b: *Is GMO qualified to provide the proposed project services?*

GMO is qualified to provide the proposed services. The Company has substantial experience in integrating distributed solar generation owned by its customers into its distribution and transmission infrastructure. Moreover, investor-owned utilities, municipal utilities, and rural electric cooperative utilities have all proved able to seamlessly install and operate utility-scale solar facilities in the state of Missouri. There is no reason to conclude that KCP&L-Greater Missouri Operations Company – a large Midwestern investor-owned utility with experienced and knowledgeable staff – should have any less ability to operate a large solar facility and integrate it into its generation portfolio.

Issue 1c.: *Does GMO have the financial ability to provide the project services?*

Renew Missouri takes no position on this issue.

Issue 1d: *Is GMO's proposed project economically feasible?*

Renew Missouri takes no position on this issue.

Issue 1e: *Does GMO's proposed project promote the public interest?*

GMO's proposed project does promote the public interest, in that it diversifies GMO's portfolio, eases the utility's federal and state environmental compliance burdens, responds to the expressed preference for solar energy of many of the utility's customers, reduces the need of the utility to purchase fossil fuels, and promotes a transition to cleaner sources of electricity that will produce better health outcomes for GMO's customers and the surrounding Missouri public.

*Issue 2: If GMO's CCN Application does not meet the criteria set forth by Tartan, is there an exception that would still permit the Commission to grant the CCN?*

Renew Missouri takes no position on this issue.

*Issue 3: Should the impact on rate payers be considered by the Commission when weighing GMO's CCN application?*

Renew Missouri takes no position on this issue.

*Issue 3a: If so, does the evidence establish that the project will have an impact on rate payers?*

Renew Missouri takes no position on this issue.

*Issue 3b: If rate payer impact is an appropriate issue, does the effect violate the public interest?*

Renew Missouri takes no position on this issue.

*Issue 4: Who will benefit from any tax credits extended by the U.S. government should the project be approved?*

Renew Missouri takes no position on this issue.

*Issue 5: If the Commission approves the CCN, should it impose any conditions?*

Renew Missouri takes no position on this issue.

#### Motion to Late File

1. Renew Missouri recognizes that the Commission's January 27, 2016 Order established February 8, 2016 as the deadline for filing Statements of Position. Counsel for Renew Missouri was unable to meet this deadline as a result of other obligations.

2. Granting Renew Missouri leave to late file the above Statement of Position will benefit the public interest by assisting the Commission's record for decision in this case, and no other parties will be harmed by the lateness of this pleading.

WHEREFORE, Renew Missouri respectfully submits its Statement of Position and requests that it be permitted to file the pleading beyond the established deadline for the reasons stated above.

Respectfully Submitted,

*/s/ Andrew J. Linhares*

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ATTORNEY FOR RENEW MISSOURI

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was either mailed, faxed or emailed to all counsel of record on this 9th day of February, 2016.

*/s/ Andrew J. Linhares*

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Andrew J. Linhares