

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

In the Matter of the Application)	
Of Union Electric Company)	Case No. ET-2016-0246
d/b/a Ameren Missouri for Approval)	
of a Tariff Setting a Rate for)	Tracking No. YE-2017-0030
Electric Vehicle Charging Stations)	

**POSITION STATEMENT OF KANSAS CITY POWER
& LIGHT COMPANY AND KCP&L GREATER
MISSOURI OPERATIONS COMPANY**

COMES NOW Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (collectively, “KCP&L”), and pursuant to 4 CSR 240-2.080 and *Order Setting Procedural Schedule And Other Procedural Requirements* issued on November 9, 2016, provides the Commission with its Position Statement on the issues in this case.

LIST OF ISSUES

1. Commission Jurisdiction

Does the Commission have jurisdiction to regulate utility-owned and operated electric vehicle charging stations operated in a utility’s service area?

KCP&L Position: Yes, the Commission has jurisdiction to regulate utility-owned and operated electric vehicle charging stations operated in a utility’s service area.

2. Public Policy

Are there public benefits realized from the installation of electric vehicle charging stations, specifically if the Commission were to approve Ameren Missouri’s

proposed pilot project?

KCP&L Position: Yes. KCP&L supports the position of Ameren Missouri on this issue.

3. Rates

Does Ameren Missouri's proposed tariff represent the proper rate design for its EV charging station pilot project?

KCP&L Position: KCP&L takes no position on this issue.¹

WHEREFORE, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company request that the Commission adopt their position on the issues in this case.

Respectfully submitted,

/s/ James M. Fischer

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¹ KCP&L reserves the right to assert any position related to its own rates, and the accounting treatment for the costs and revenues associated with its Electric Vehicle ("EV") Charging Station Tariff in Case No. ER-2016-0284 and/or any future proceeding involving KCP&L's EV charging station services.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 6th day of January, 2017, to all counsel of record.

/s/James M. Fischer

James M. Fischer