

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

In the Matter of the Application of)
Great Plains Energy Incorporated for Approval) File No. EM-2018-0012
of its Merger with Westar Energy, Inc.)

**STATEMENT OF POSITION ON THE ISSUES
OF THE MISSOURI JOINT MUNICIPAL
ELECTRIC UTILITY COMMISSION**

The Missouri Joint Municipal Electric Utility Commission (“MJMEUC”), pursuant to this Commission’s October 19, 2017 Order Setting Procedural Schedule and Other Procedural Requirements, hereby respectfully submits its Statement of Position on the Issues as follows:

I. Should the Commission find that GPE’s merger with Westar is not detrimental to the public interest, and approve the merger?

Yes, the Commission should find that GPE’s merger with Westar is not detrimental to the public interest and approve the merger, subject to all conditions contained in the Stipulation and Agreement filed herein on January 12, 2018 by Great Plains Energy Incorporated, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, Westar Energy, Inc. (collectively “the Applicants”), the Staff of the Missouri Public Service Commission (“Staff”), Brightergy, LLC (“Brightergy”), and MJMEUC.

II. Should the Commission condition its approval of GPE’s merger with Westar and, if so, how?

Yes, the Commission should condition its approval of GPE’s merger with Westar by incorporating into its approval all conditions contained in the Stipulation and Agreement filed herein on January 12, 2018 by the Applicants, Staff, Brightergy, and MJMEUC.

III. Should the Commission grant the limited request for variance of the affiliate transaction rule requested by Applicants?

Yes, the Commission should grant the limited request for variance of the affiliate transaction rule requested by Applicants, pursuant to all conditions contained in the Stipulation and Agreement filed herein on January 12, 2018 by the Applicants, Staff, Brightergy, and MJMEUC.

IV. How should the bill credits proposed by Applicants be allocated between and within the various KCP&L and GMO rate classes?

The bill credits should be allocated to each retail electric customer based upon a methodology to be approved by the Commission.

WHEREFORE, MJMEUC prays that the Commission will accept its Statement of Position on the Issues.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail, this 5th day of March, 2018, addressed to:

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