

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of KCP&L)
Greater Missouri Operations') File No. ER-2016-0156
Request for Authority to Implement)
a General Rate Increase for Electric Service)

STATEMENT OF POSITION OF RENEW MISSOURI

Renew Missouri takes positions only on the rate design issues designated XXIV.B. b, j and l on pages 5–6 of the List of Issues:

“b) *What is an appropriate residential customer charge under the appropriate rate design?*”

Position: GMO has failed to substantiate its need for a customer charge of \$14.50, an approximately 45% increase over the average current residential customer charges for the MPS (\$10.43) and L&P (\$9.54) territories. Renew Missouri is not in a position to say exactly what a consolidated charge should be.

“j) *Should the Commission order GMO to file a proposal to make TOU rates available to all customers including a study of applicable TOU determinants?*”

Position: Yes. In the process, the company should investigate a range of time-differentiated rates including real-time pricing and time-of-use rates. TOU rates are valuable for reducing peak demands and sending price signals that promote energy efficiency.

“l) *Should the Commission order a working group be formed to evaluate the impacts, for residential and small general service class, of transitioning to inclining block rates on lower income and electric space heating and cooling users and to consider the merits of more extensive block rate modifications?*”

Position: Renew Missouri supports inclining block rates because they motivate customers to conserve energy and serve better than flat or declining block rates to allocate costs between customers based on the demands they make on the utility system. The Commission should order GMO to implement residential and SGS inclining block rates. However, if the Commission regards such a step as premature, we support the formation of a working group to establish the proper framework for IBR.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was sent by email on this 9th day of September, 2016, to all counsel of record:

/s/ Henry B. Robertson
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