

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

In the Matter of the Application of KCP&L)	
Greater Missouri Operations Company for)	File No. ER-2016-0156
Authority to Implement a General Rate)	Tariff No. YE-2016-0223
Increase for Electric Service)	

MIEC STATEMENT OF POSITION

COMES NOW the Missouri Industrial Energy Consumers (“MIEC”)

and, for its Statement of Position on the following issues, states:

VI. Lake Road Plant electric/steam allocation factors - What factors should the Commission use to allocate GMO’s total rate base, expenses and revenues of its Lake Road Plant to its electric customers to account for GMO contemporaneously using the Lake Road Plant to serve its steam customers?

MIEC Position: The Commission should adopt the same allocation factors that GMO is currently using.

XXIV. Class cost of service, rate design, tariff rules and regulations

- A. Should the Commission eliminate the MPS and L&P rate districts, and order GMO-wide rates?
- B. Rate design
 - a) What is an appropriate residential rate design?
 - b) What is an appropriate residential customer charge under the appropriate rate design?
 - c) What customer impact mitigation measures, if any, should be used for the LPS, LGS, and SGS classes?
 - d) What billing determinants should be used for determining the rates to collect GMO’s cost of service?
 - e) What adjustment should be made to account for any changes in retail revenue attributable to customers being placed on their most advantageous rate as a result of the rate design approved in this case?
 - f) When should GMO revise its load research to account for the elimination of the MPS and L&P rate districts?
 - g) Should the Commission order GMO to file a rate design case once a year of hourly data is available under the new classes and implemented rates?
 - h) Should the Commission order GMO to file a Class Cost of Service Study with supporting data in its next rate case?

- i) Should the Commission allow GMO to freeze its time differentiated rates, including Time of Use (“TOU”)?
- 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?
- k) Should the Commission order GMO specifically to study time of use rates and summer/shoulder/winter rates, and to include its proposals for such rates in its next rate filing?
- l) Should the Commission order a working group be formed to “evaluate the impacts 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?”

MIEC Position: Subissue c. If the Commission does order GMO-wide rates, it should incorporate gradualism as recommended in the testimony of Maurice Brubaker so that the undue and harsh impacts to some customers in the MPS district can be mitigated by lowering the decreases in rates to customers receiving decreases and increasing the rates to those receiving below average increases.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 9th day of September, 2016, to all parties on the Commission's service list in this case.

/s/ Edward F. Downey