

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

In the Matter of Kansas City Power & Light)
Company's Request for Authority to Implement) File No. ER-2018-0145
a General Rate Increase for Electric Service)

In the Matter of KCP&L Greater Missouri)
Operations Company's Request for Authority) File No. ER-2018-0146
To Implement a General Rate Increase for)
Electric Service)

**RESPONSE OF THE ADVANCED ENERGY MANAGEMENT ALLIANCE TO THE
OPPOSITION OF ITS INTERVENTION BY KANSAS CITY POWER AND LIGHT AND
KCP&L GREATER MISSOURI OPERATIONS**

COMES NOW the Advanced Energy Management Alliance ("AEMA") and, pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission's ("Commission") Rules of Practice and Procedure, files its Response to the Opposition of its Intervention by Kansas City Power and Light and KCP&L Greater Missouri Operations, and respectfully states as follows:

1. On July 30, 2018, Kansas City Power and Light and KCP&L Greater Missouri Operations (collectively, "KCP&L") filed a response ("Response") in opposition to AEMA's July 24, 2018 application to intervene out-of-time.

2. KCP&L disputes AEMA's out-of-time intervention on the grounds that "AEMA has not demonstrated good cause to intervene five months beyond the intervention deadline." (Response ¶ 3). KCP&L posits that other parties are suitably positioned to address their supplemental direct testimony, that AEMA's intervention would be disruptive, and that the issues of interest to AEMA would be better addressed in KCP&L's MEEIA III filing. (Response ¶¶ 5-6).

3. KCP&L's Response has no merit.

4. First, while current parties to the case have an opportunity to address KCP&L's supplement direct testimony ("Testimony"), AEMA was an active participant in the proceeding (File No. EW-2017-0245) that led to the Commission's May 4, 2018 Order ("Order") directing the Testimony at issue and was the primary advocate of the Indiana Model that is central to the Testimony. Furthermore, AEMA has first-hand experience with the Indiana Model and as such, has an ability to comment on its best practices and respond to KCP&L's testimony with a perspective that other parties lack.

5. Second, whether AEMA's intervention at this point in the proceeding would be "disruptive" is hardly the standard to apply. Clearly, AEMA's intervention now **would not be prejudicial** to KCP&L or the other parties. AEMA accepts the record and the procedural schedule as it is. Time is sufficient for AEMA to meet the August 7, 2018 deadline for the filing of rebuttal to the Testimony, and it intends to do so. AEMA understands that the Commission Staff's rebuttal to the Testimony will be submitted the same day. In surrebuttal testimony, which is due on September 4, 2018, KCP&L, Staff and all other parties at their option will have time enough to address AEMA's positions.

6. Third, when the Commission issued its Order in this case, the Commission established that this is the appropriate proceeding to discuss these issues. While KCP&L proposes to further address these issues in its upcoming MEEIA filing, KCP&L has failed to deliver a compelling reason why AEMA should be voiceless in this docket where the issue of the Indiana Model has been raised by Commission directive.

7. Given that the original intervention deadline passed prior to the Commission's Order, and that AEMA's intervention is directly tied to the issues outlined in the Order, an order

which materially expanded the subject matter scope of this rate case, AEMA's request to intervene should be treated as timely and procedurally regular. AEMA has good cause to intervene out-of-time and add its unique perspective, knowledge, and expertise to the case, without impairing other parties' rights to address AEMA's positions. All of this will serve to develop a complete record for the benefit of the public.

WHEREFORE, AEMA respectfully submits its response to KCP&L's opposition of its intervention, and restates its request that the Commission grant its Application to Intervene Out-Of-Time.

Respectfully submitted,

/s/ Mark W. Comley

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 31st day of July, 2018 to:

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/s/ Mark W. Comley _____