

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

In the Matter of Kansas City Power & Light)
Company's Notice of Intent to File an)
Application for Authority to Establish a) **File No. EO-2015-0240**
Demand-Side Programs Investment Mechanism)

In the Matter of KCP&L Greater Missouri Operations)
Company's Notice of Intent to File an)
Application for Authority to Establish a) **File No. EO-2015-0241**
Demand-Side Programs Investment Mechanism)

PUBLIC COUNSEL'S STATEMENT OF POSITIONS

COMES NOW the Office of the Public Counsel ("Public Counsel" or "OPC") and submits its statement of positions:

List of Issues

Issue 1: Should the Missouri Public Service Commission ("Commission") approve the Missouri Energy Efficiency Investment Act ("MEEIA") Cycle 2 programs and demand-side programs investment mechanism as agreed on in the joint position and articulated in the Non-Unanimous Stipulation and Agreement Resolving MEEIA Filings filed November 23, 2015 ("Stipulation")?

OPC Position:

The Commission should approve the terms of the Non-unanimous Stipulation and Agreement Resolving MEEIA Filings filed on November 23, 2015.

Issue 2: Should the Commission approve the Commercial and Industrial ("C & I") Custom Rebate program in the Stipulation over the objection of Brightergy?

OPC Position:

The Commission should approve the terms of the Non-unanimous Stipulation and Agreement Resolving MEEIA Filings filed on November 23, 2015.

Issue 3: Should the Commission approve the regulatory flexibility provisions in the Stipulation over the objection of Brightergy?

OPC Position:

The Commission should approve the terms of the Non-unanimous Stipulation and Agreement Resolving MEEIA Filings filed on November 23, 2015.

WHEREFORE, the Office of the Public Counsel submits the foregoing statement of positions.

Respectfully,
OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 6th day of January 2016:

Missouri Public Service Commission

Service List for Case No. **EO-2015-0240** Last Updated: **12/18/2015**

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