

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

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

POSITION STATEMENTS OF THE CONSUMERS COUNCIL OF MISSOURI

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

Consumers Council: No, absent appropriate conditions, the Commission should find that GPE's proposed merger with Westar to be detrimental to the public interest and reject the merger.

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

Consumers Council: Any approval of GPE's merger with Westar should include appropriate conditions in order to protect ratepayers from detrimental impacts of the proposed transaction. Consumers Council hereby adopts the five conditions proposed by the Missouri Energy Consumers Group (MCEG) and recommends that those conditions [II. (a)-(e) on pp. 1-2 of the March 5, 2018 MCEG Statements of Position] be adopted if the merger is approved.

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

Consumers Council: No.

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

Consumers Council: Missouri ratepayers should receive an equitable amount of any bill credits, and the Commission should adopt a method of allocating bill credits that ensures that Missouri residential consumers receive the greatest share of such bill credits.

Respectfully submitted,

/s/ John B. Coffman

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Dated: March 6, 2018

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 6th day of March 2018.

/s/ John B. Coffman
