

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

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

**STATEMENT OF POSITION OF
KANSAS ELECTRIC POWER COOPERATIVE, INC.**

COMES NOW the Kansas Electric Power Cooperative, Inc. (“KEPCo”) and, pursuant to the Commission’s October 19, 2017 Order Setting Procedural Schedule, files this statement of position on the list of issues filed on February 28, 2018 in the above-captioned docket.

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

The Commission should only approve the merger upon imposition of the conditions discussed under Issue II.

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

Yes. The Commission should condition its approval of the merger on measures that better protect customers from future adverse impacts of the merger. KEPCo believes that additional ring-fencing measures and alterations to the commitments in Exhibit A to the January 12, 2018 Stipulation and Agreement are needed to protect the customers of the Joint Applicants’ regulated utilities. Additionally, the Commission should condition its approval of the merger on a requirement that Joint Applicants cannot retire any generating capacity without first obtaining approval from the Commission. Prior to applying for approval of the retirement of any generating capacity, the Commission should require Joint Applicants to file a comprehensive, rigorous and transparent integrated resource plan, including market-tested pricing observed from competitive Request for Proposal processes.

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

KEPCo takes no position on this issue.

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

KEPCo takes no position on this issue.

Respectfully Submitted,

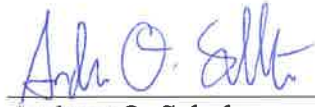


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ATTORNEYS FOR KANSAS ELECTRIC
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the secretary of the commission.



Andrew O. Schulte

Dated: March 5, 2018