

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

In the Matter of the Application of)
KCP&L Greater Missouri Operations Company)
For Approval of a Special Rate for a Facility) File No. EO-2019-0244
Whose Primary Industry is the Production or)
Fabrication of Steel in or Around Sedalia, Missouri.)

PUBLIC COUNSEL’S POSITION STATEMENT

COMES NOW, the Office of the Public Counsel (OPC), to present its Position Statement as to the List of Issues as follows:

Issue 1: Must the proposed special incremental load tariff and Nucor special contract be approved pursuant to Section 393.355, RSMo? If not, under what statutory authority is the Commission approving the terms of the SIL tariff and the Nucor special contract?

The OPC does not take a position on this issue at this time, but reserves the right to take a position based on the evidence and arguments presented.

Issue 2: Should the Commission approve the SIL tariff proposed by GMO and the special contract rate proposed for Nucor subject to the customer protections and monitoring and reporting requirements by Staff, Nucor and GMO?

The OPC does not take a position on this issue at this time, but reserves the right to take a position based on the evidence and arguments presented.

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 15th Day of October, 2019, with notice of the same being sent to all counsel of record.

/s/ Caleb Hall