

**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 a General Rate Increase for Electric Service)	File No. ER-2018-0145
)	
In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority To Implement a General Rate Increase for Electric Service)	File No. ER-2018-0146
)	

**ADVANCED ENERGY MANAGEMENT ALLIANCE'S
STATEMENT OF POSITION**

Comes now the Advanced Energy Management Alliance ("AEMA"), by and through counsel, and submits this statement of position on the revised list of issues filed in this case on September 18, 2018:

Issue:

VI. Indiana Model – Should the Commission order each utility's Demand Response Incentive Tariff be modified to incorporate the Indiana Model, as proposed by AEMA.

Position:

Yes. The Indiana Model, which derives its name from Indiana Michigan Power Company's D.R.S. 1 tariff, facilitates the growth of cost-effective demand response. The best practices of the Indiana Model should be incorporated into Kansas City Power & Light Company's (KCP&L) and KCP&L Greater Missouri Operation Company's (KCP&L GMO) Demand Response Incentive tariffs. Incorporating these best practices would help increase participation in the tariffs and drive more cost-effective demand-side savings. A draft of a tariff with revisions reflecting the provisions of the Indiana Model is attached to Mr. Nicholas J. Papanastassiou's rebuttal testimony. Both KCP&L and KCP&L GMO should file such a tariff in this proceeding and in the companies' respective MEEIA Cycle 3 submissions.

AEMA takes no position on the other listed issues without impairment of its right to brief and argue those issues to the Commission as the evidence may unfold at hearing.

Respectfully submitted,

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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 19th day of September, 2018 to:

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