

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

In the Matter of the Determination of Carrying)
Costs for the Phase-In Tariffs of KCP&L Greater) **Case No. ER-2012-0024**
Missouri Operations Company)

PUBLIC COUNSEL’S STATEMENT OF POSITIONS

COMES NOW the Office of the Public Counsel and for its Statement of Positions states as follows:

1. Does the Commission have jurisdiction in this case?

Public Counsel’s Position: Yes.

2. Does the Commission decision consider all relevant factors?

Public Counsel’s Position: Public Counsel does not understand this issue, and thus takes no position on it at this time.

3. Should GMO’s carrying costs in the phase-in tariff schedules filed in this proceeding be 3.25% per year?

Public Counsel’s Position: Yes.

***4. Should the Commission order that the tariff schedules filed with the Non-
Unanimous Stipulation And Agreement on September 2, 2011, for the second, third and
fourth year of the phase-in plan be allowed to become effective automatically in each
subsequent year on June 25 without further order of the Commission, unless suspended by
the Commission for good cause shown?***

Public Counsel’s Position: No, the Commission should reject those tariffs and order KCP&L to file tariff sheets in conformance with those attached to the Non-unanimous Stipulation and Agreement filed on September 2, 2011.

WHEREFORE, Public Counsel respectfully submits its Statement of Positions.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 23rd day of December, 2011.

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