BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)

)

)

)

)

In the Matter of Kansas City Power & Light Company's Application for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism.

Case No. EO-2014-0095

<u>THE EMPIRE DISTRICT ELECTRIC COMPANY'S</u> <u>STATEMENT OF POSITIONS</u>

COMES NOW The Empire District Electric Company ("Empire"), by counsel, and respectfully files its Statement of Positions in the above-captioned case. In this regard, Empire states as follows to the Missouri Public Service Commission ("Commission"):

1. The Commission's *Order Modifying Procedural Schedule and Granting Variance* issued herein on February 26, 2014, provides for the filing of position statements by April 22, 2014.

2. Kansas City Power & Light Company ("KCPL") filed its application herein seeking approval of demand-side programs and the establishment of a demand-side programs investment mechanism pursuant to the Missouri Energy Efficiency Investment Act ("MEEIA"). Empire, as an investor-owned electric utility with a MEEIA filing pending before this Commission (Case No. EO-2014-0030), has a direct and specific interest in the issues involved in this case, including the Commission's interpretation and application of MEEIA.

3. Empire has not filed testimony in this case, and, at this time, Empire takes no position on the issues set forth in the issue lists filed herein. Empire reserves its right to assert its positions on various issues when evidence is presented during the evidentiary hearings in this case, to file post-hearing briefs, and to otherwise participate fully in further proceedings in this case.

1

WHEREFORE, The Empire District Electric Company respectfully submits this Statement of Positions. Empire requests such relief as is just and proper under the circumstances.

BRYDON, SWEARENGEN & ENGLAND P.C.

By: <u>/s/ Diana C. Carter</u> Diana C. Carter MBE #50527 312 East Capitol Avenue P.O. Box 456 Jefferson City, MO 65102 Telephone: (573) 635-7166 Facsimile: (573) 634-7431 E-mail: DCarter@BrydonLaw.com

ATTORNEYS FOR THE EMPIRE DISTRICT ELECTRIC COMPANY

<u>Certificate of Service</u>

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail on this 21^{st} day of April, 2014, to all counsel of record.

/s/ Diana C. Carter_____