

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

In the Matter of Great Plains Energy Incorporated for) Case No. EM-2017-0226
Approval of its Acquisition of Westar Energy, Inc.)

POSITION STATEMENTS OF THE CONSUMERS COUNCIL OF MISSOURI

COMES NOW the Consumers Council of Missouri ("Consumers Council" or "CCM"), and provides its position statements on the list of issues, as follows:

I. Should the Commission find that GPE's acquisition of Westar is not detrimental to the public interest, and approve the transaction?

Consumers Council Position:

No. The Applicants have failed to met the burden to proof to show that the proposed acquisition would lack detriments for residential ratepayers in Missouri or detriments for the overall Missouri economy.

II. Should the Commission condition its approval of GPE's acquisition of Westar and, if so, how?

Consumers Council Position:

Yes. The Commission should not approve the GPE's proposed acquisition of Westar without sufficient conditions and ratepayer protections. The conditions contained in the Stipulation and Agreements filed in the affiliate transactions case (EE-2017-0113) are not sufficient to ensure that the proposed transaction would be free of detriments.

III. Should the Commission address matters such as transmission and power supply services and, if so, how?

Consumers Council Position:

Consumers Council does not take a position on this issue, but reserves the right to base a final position on the testimony provided at hearing.

IV. Should the Commission grant the limited request for variance of the affiliate transaction rule requested by GPE, KCP&L and GMO?

Consumers Council Position:

If the Commission can otherwise approve sufficient conditions to sufficient to ensure that the proposed transaction is free of detriments, then the Commission should grant the limited request for variance of the affiliate transaction rule, provided it is subject to the conditions and protections contained in the Stipulation and Agreement filed by GPE, KCPL, GMO, and Public Counsel on October 26, 2016 in docket No. EE-2017-0113 and the conditions contained in the Stipulation and Agreement filed by GPE, KCPL, GMO, and Staff on October 12, 2016 in docket No. EE-2017-0113.

V. Should the Commission condition its approval of GPE's limited request for variance of the affiliate transaction rule requested by GPE, KCP&L and GMO and if so, how?

Consumers Council Position:

See the position above in Issue IV.

Respectfully submitted,

/s/ John B. Coffman

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Dated: March 31, 2017

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 31st day of March, 2017.

/s/ John B. Coffman
