

**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	)	Case No. ER-2014-0370
Rate Increase for Electric Service	)	

**ERRATA TO PUBLIC COUNSEL'S  
STATEMENT OF POSITIONS**

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

1. Public Counsel's Statement of Positions filed on June 9, 2015 included two errors that Public Counsel corrects with these Errata.

2. First, Public Counsel's position statement on issue XVII (C) incorrectly referred to "policyholders" when it should have referred to "policymakers." The same position statement also included a minor typo. Both are corrected in the following, which is an accurate statement of Public Counsel's position on this issue:

C. ISSUE: If the Clean Charge Network is a public utility service, who pays for it?

**OPC Position:** There is not enough supporting detail to substantiate any ratepayer burden. All costs submitted in this case should be rejected and borne by shareholders. If/when it is appropriate for ratepayers to bear the costs of the CCN - after policymakers have weighed-in during an appropriate proceeding – only the cost causers/end users should pay for the costs.

3. Second, Public Counsel inadvertently failed to provide a position

statement regarding what was identified in the Issues List as issue XXVII, Economic Relief Pilot Program. This issue did not appear in an earlier version of the issue list circulated to the parties, and its addition to the issue list was not noticed. Public Counsel's position on that issue is as follows:

**XXVII: Economic Relief Pilot Program** – Should the program be expanded to serve additional customers as proposed by KCPL?

**OPC Position:** No. KCPL's proposed expansion of the program is contingent on the 177% residential customer charge increase as stated in the rebuttal testimony of KCPL witness Mr. Tim M. Rush, where he states "I would say the ERPP expansion is contingent on the increased residential customer charge...Absent approval of an increased customer charge, this expansion is not warranted" (Rush Rebuttal, pp. 5, 13-14, 21). Since Public Counsel is strongly opposed to increasing the customer charge, Public Counsel must also oppose any increase to the ERPP that is contingent upon increasing the customer charge (Marke Direct, p. 5).

WHEREFORE, the Office of the Public Counsel respectfully offers these Errata.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By: /s/ Marc D. Poston

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 11<sup>th</sup> day of June 2015.

**/s/ Marc Poston**