

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

In the Matter of the Application of)	
KCP&L Greater Missouri Operations)	
Company for Permission and Approval of)	
a Certificate of Public Convenience and)	Case No. EA-2015-0256
Necessity Authorizing It to Construct,)	
Install, Own, Operate, Maintain and)	
Otherwise Control and Manage Solar)	
Generation Facilities in Western Missouri)	

JOINT STATEMENT OF CONTESTED ISSUES

COMES NOW the Office of the Public Counsel (“Public Counsel”), Staff of the Missouri Public Service Commission (“Staff”), United for Missouri, Brightergy, LLC, and KCP&L Greater Missouri Operations Company (“GMO” or “Company”), and submits their proposed *Statement of Contested Issues* and states as follows:

This joint filing does not indicate that the Parties agree with the statement of every issue, or that each issue on the following List of Issues is appropriate for Commission decision, and the Parties reserve the right to comment in their Position Statements on whether a listed issue is properly before the Commission.

Issue 1: *Does the evidence establish that the Solar Generation project as described in GMO’s applications in this docket and for which GMO is seeking a certificate of convenience and necessity (“CCN”), is “necessary or convenient for the public service” within the meaning of section 303.170, RSMo?*

Issue 1a: *Does the evidence establish that there is a need for the project?*

Issue 1b: *Is GMO qualified to provide the proposed project services?*

Issue 1c.: *Does GMO have the financial ability to provide the project services?*

Issue 1d: *Is GMO’s proposed project economically feasible?*

Issue 1e: *Does GMO’s proposed project promote the public interest?*

- Issue 2: *If GMO's CCN Application does not meet the criteria set forth by Tartan, is there an exception that would still permit the Commission to grant the CCN?*
- Issue 3: *Should the impact on rate payers be considered by the Commission when weighing GMO's CCN application?*
- Issue 3a: *If so, does the evidence establish that the project will have an impact on rate payers?*
- Issue 3b: *If rate payer impact is an appropriate issue, does the effect violate the public interest?*
- Issue 4: *Who will benefit from any tax credits extended by the U.S. government should the project be approved?*
- Issue 5: *If the Commission approves the CCN, should it impose any conditions?*

WHEREFORE, undersigned counsel submits their *Joint Statement of Contested Issues*.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 4th day of February 2016:

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