

**THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of Westar Energy, Inc. and)
Kansas Gas and Electric Company Seeking) Docket No. 15-WSEE-021-TAR
Commission Approval for Tariff Revisions to)
the Energy Efficiency Rider.)

**CURB's Response to Westar Energy, Inc. and Kansas Gas and Electric Company's
Response to CURB's Reply to Staff's Report and Recommendation and the Commission
Staff's Reply to CURB's Reply and Westar' Response**

The Citizen's Utility Ratepayer Board ("CURB") submits its Response to responsive comments filed by Westar Energy, Inc. and Kansas Gas and Electric Company ("Westar") and the Staff of the Kansas Corporation Commission ("Staff") which were filed in the above-captioned docket on October 7, 2014 and October 9, 2014, respectively.

I. BACKGROUND

1. On July 15, 2014, Westar filed proposed tariff revisions relating to its Energy Efficiency Rider ("EER"). The revisions made by Westar would allow Westar to recover \$5,543,112 from ratepayers through its EER. On September 18, 2014, Staff recommended the Commission approve Westar's application in its entirety:

2. On September 29, 2014, CURB filed the response of Ms. Stacey Harden to Staff's Report and Recommendation recommending the Commission:

- (1) disallow \$27,964 in expenses for notebooks, sponsorships, cash awards, baseball caps, and flashlights;
- (2) allow Westar to recover \$5,515,148 from ratepayers through its EER;

- (3) require Westar to file a petition for new operating budgets for each of its energy-efficiency programs;
- (4) order Westar to conduct evaluation, measurement and verifications (“EM&V”) for each of its energy-efficiency programs, as defined by Docket 08-GIMX-442-GIV (“442 Docket”); and
- (5) require an EM&V of Westar’s Simple Savings program as ordered in Docket No. 10-WSEE-775-TAR.

3. On October 7, 2014, Westar filed a response to CURB’s reply comments. In its response, Westar did not object to CURB’s adjustment removing \$27,964 from its EER. Westar also recommend the Commission disregard CURB’s additional recommendations requiring budgets and EM&Vs, because those recommendations are outside the scope of the EER docket.

4. On October 9, 2014, Staff filed a reply to both CURB’s reply and Westar’s response. Staff disagreed that expenses for flashlights, ball caps, and notebooks should be disallowed by the Commission, but because Westar does not oppose the exclusion, Staff will simply not address the issue further. Staff also agrees with Westar that CURB’s recommendations regarding budgets and EM&V should not be considered in the context of an EER application. However, Staff notes that CURB has raised legitimate concerns that are appropriate for the Commission to consider.

II. EER FILINGS

5. In its reply to CURB, Westar states that the Commission should not consider CURB’s suggestions regarding program budgets and EM&V because CURB’s suggestions are outside the scope of this docket. Westar misinterprets CURB’s recommendations to the Commission. CURB is not recommending the Commission make a determination on appropriate

budgets in the EER proceeding. Similarly, CURB is not recommending that EM&Vs be conducted as part of the EER proceeding.

6. CURB recommends approval of \$5,515,148 in energy-efficiency expenses to be recovered through the EER. However, because the Commission has previously indicated that EERs should be implemented in a “manner that maintains the Commission’s responsibility to review costs for prudence,”¹ CURB’s response evaluated not only Westar’s expenditures, but also the current status of Westar’s programs, as well as the status of Westar’s EM&Vs. CURB’s suggestions are not out of place in this proceeding, as CURB’s suggestions further the Commission’s ability to review costs for prudence.

7. Staff seems to agree that CURB’s suggestions need consideration of the Commission, by stating “CURB has raised legitimate concerns that are appropriate for the Commission to consider.”² Accordingly, CURB maintains the original recommendations made in Ms. Harden’s initial reply and as stated above.

III. PROGRAM BUDGETS

8. Westar disagrees with CURB’s statement that if Commission-approved budgets are required for a utility to implement an energy-efficiency program and later seek recovery of costs, the lack of a Commission-approved budget would terminate the utility’s ability to offer the program and later recover costs associated with the program. Westar points out that none of its programs were approved in a limited time frame and states that a Commission order requiring

¹ KCC Docket No. 08-GIMX-441-GIV, November 14, 2008, *Final Order*, at ¶38.

² Docket No. 15-WSEE-021-TAR, Commission Staff’s *Reply to CURB’s Reply and Westar’s Response*, at ¶17.

Westar to come back with a full-blown application and docketed proceeding every five years would be a “waste” of resources.³

9. Westar misses the point of Commission-approved budgets entirely. A budget is spending authority. In the case of energy-efficiency programs, a Commission-approved budget is paramount to a pre-approval. Requiring a utility to receive Commission approval to spend over \$44 million for energy-efficiency programs is not a “waste” of resources. Alternatively, without a Commission-approved budget, a utility would be allowed to spend and seek recovery of an unlimited amount of ratepayer dollars on programs. This lack of budget authority could certainly result in a “waste” of consumer dollars.

10. CURB agrees that the Commission’s orders in Docket No. 08-GIMX-441-GIV (“441 Docket”) and the 442 docket do not include specific language requiring a utility to seek re-approval of Commission budgets upon expiration of its existing budgets. However the necessity of Commission-approved budgets is clearly recognized throughout both the 441 ad 442 Dockets. Specifically, the Commission established:

- EM&V expenses should not exceed 5% of a utility’s budget for its energy-efficiency programs;⁴
- Education spending should not exceed 5% of the utility’s total energy-efficiency portfolio budget;⁵ and
- That utility’s must seek Commission approval to adjust a program’s budget over 10%.⁶

³ Docket No. 15-WSEE-021-TAR, Westar’s *Response to CURB’s Reply to Staff’s Report and Recommendation*, at ¶11.

⁴ KCC Docket No. 08-GIMX-442-GIV, April 13, 2009, *Order Following Collaborative on Benefit Cost Testing and Evaluation, Measurement, and Verification*, at ¶50.

⁵ *Id.*, at ¶ 32.

⁶ *Id.*, at ¶ 181.

11. While some of Westar's Commission-approved programs do not include program termination dates, the program budgets were approved by the Commission for a limited time of five years. When the Commission approved Westar's energy-efficiency programs, it did not approve six or seven-year budgets, nor did it provide Westar unlimited spending authority. The Commission approved Westar's requested budgets in both dollars and time.

12. During 2014, the five-year budgets approved by the Commission expire. Accordingly, so does Westar's spending authority. Because Westar's programs were not approved on a limited-time basis, it may be true that Westar can continue to operate its energy-efficiency programs. However, without a Commission-approved budget, Westar has no assurance that it will be allowed recovery of the energy-efficiency expenses incurred after the program's budget expiration.

13. Staff agrees that Westar's energy-efficiency program budgets will expire in 2014.⁷ But Staff states that it is uncertain what the legal effect of the expiration of budgets may be and recommends that a generic investigation be opened to determine the effect of expired budgets. Staff is over complicating a relatively simple concept: a budget is the utility's authority to spend a level of ratepayer dollars for a Commission approved venture. Without a budget, there will no longer be a threshold, a limit or any other mechanism that will allow for Staff to evaluate, and for the Commission to implement, an EER that allows recovery of expenses in a manner that "...maintains the Commission's responsibility to review costs for prudence."⁸ The need for a generic proceeding as recommended by Staff is unnecessary.

⁷ Docket No. 15-WSEE-021-TAR, Commission Staff's *Reply to CURB's Reply and Westar's Response*, at ¶18.

⁸ KCC Docket No. 08-GIMX-441-GIV, November 14, 2008, *Final Order*, at ¶38.

14. Staff recommends the Commission approve all expiring Westar energy efficiency program budgets on an interim basis at their 2014 budgeted levels. While CURB understands the rationale behind Staff's recommendation, the implementation of Staff's vague recommendation is problematic.

15. First, as recommended by CURB, argued by Westar, and concurred by Staff, this EER docket is not the appropriate proceeding for the Commission to determine the ongoing budgets for Westar's energy-efficiency programs. As previously stated, CURB is not recommending the Commission make a determination on appropriate budgets – whether interim or longer – in this proceeding. A separate proceeding should be established for the Commission to determine the appropriate amount of energy-efficiency budgets for Westar.

16. Second, it is inappropriate for Staff to make a recommendation to extend program budgets for Westar. The burden to request an extension of an expired budget falls squarely upon Westar. If Westar intends to incur expenses for its energy-efficiency programs beyond the budget expirations in 2014, Westar should formally request Commission approval to do so. It is Westar – not Staff – that should provide evidence to support the appropriate level of spending for its energy-efficiency programs.

17. Third, Staff's recommendation to approve an interim budget does not include any data regarding what the interim budgets may be. Westar's programs were approved with five-year budgets that were not prorated on a year-by-year basis. Unlike Kansas City Power & Light's energy-efficiency programs, which have individual program budgets for each year that the program is offered, Westar's programs were approved with broad, sweeping language that set a five year spending level, and did not establish a yearly budget.

18. Further, the level of spending annually for Westar's programs has fluctuated. For example, in Westar's 2012 EER, Westar reported that it incurred \$11,647,519 in expenses associated with its energy-efficiency programs.⁹ Westar's current EER reports that it incurred \$5,543,384 in program expenses – over 50% less. Even if the Commission determined that an interim budget should be approved in this proceeding, no party provides a recommendation as to what interim budget should be approved.

19. According to Westar's responses to CURB Data Requests 9-11, Westar has internally developed budgets for its programs beyond 2014, but has not sought Commission approval of these budgets. It seems fairly straightforward that Westar could file a request seeking Commission approval of these budgets that have already been prepared internally by Westar. CURB does not anticipate that Westar's application to extend its program budgets would be an adversarial proceeding and does not understand the reluctance of Westar to seek Commission approval for new operating budgets.

20. CURB continues to recommend that the Commission order Westar make a filing requesting approval of new operating budgets for each of its energy-efficiency programs. As part of its application, Westar can request the Commission approve an interim budget at a specified level to allow continuation of Westar's energy-efficiency programs until such time as the Commission reaches a final decision on the application.

IV. EM&V

21. CURB recommends that the Commission order an EM&V of Westar's energy-efficiency programs, as defined by the 442 Docket. Westar argues that CURB's

⁹ Docket No. 13-WSEE-033-TAR

recommendations are without merit. CURB disagrees with Westar's assertions. When the Commission approved each of Westar's energy-efficiency programs, it specifically included language regarding EM&V in each order as detailed below:

- Building Operator Certification Program: "Westar Energy, Inc.'s application for approval of the Building Operator Certification program is granted, conditioned on ... future EM&V analyses for this program being consistent with forthcoming determinations by the Commission."¹⁰
- WattSaver Program: "Evaluation, Measurement and Verification (EM&V) of the WattSaver program should be consistent with the Commission's determinations on this issue in Docket No. 08-GIMX-442-GIV."¹¹
- Energy Efficiency Demand Response Rider: "Evaluation, measurement and verification (EM&V) review of this program be conducted in a manner consistent with forthcoming determinations by the Commission in Docket No. 10-GIMX-013-GIV."¹²
- Simple Savings Program: "The Commission finds an initial evaluation, measurement, and verification (EM&V) should be conducted after Simple Savings has been in place for two years, as recommended by the Commission in its Final Order in the 442 Docket. The Commission finds that six months is a reasonable timeframe for completion of an initial EM&V review and that it should be conducted through the EM&V process as laid out in Docket No. 10-GIMX-013-GIV by a third-party provider selected through the request for proposal (RFP) process that is currently being implemented at the Commission."¹³

22. CURB's reply comments identify that Westar has not complied with the Commission orders requiring EM&V of its programs. In its response, Westar attempted to suggest that it has conducted EM&Vs or that it was not required to conduct such evaluations. As

¹⁰ KCC Docket No. 09-WSEE-738-MIS, June 15, 2009, *Order Approving Building Operator Certification Program*, at page 7, A.

¹¹ KCC Docket No. 09-WSEE-636-TAR, May 27, 2009, *Order Approving Application and WattSaver Rider*, at ¶6(a).

¹² KCC Docket No. 10-WSEE-141-TAR, December 9, 2009, *Order Approving Energy Efficiency Demand Response Program Rider*, at ¶7(a).

¹³ KCC Docket No. 10-WSEE-775-TAR, January 31, 2011, *Order Approving Partnership Between Efficiency Kansas and Westar's Simple Savings Program*, at page 20, E.

evidence to its arguments, Westar provided explanations of its responses to CURB's data requests that seem to suggest that EM&V has either been conducted or was not required. CURB has attached copies of these data request responses as Exhibit A to this pleading.

23. In its response to CURB Data Request 7, Westar indicated that it had completed EM&V of its WattSaver program and provided copies of the EM&V reports. The EM&V reports provided by Westar consist of three Power Point presentations, each of which contains seven slides. Westar's response incorrectly suggests that Power Point presentations meet the Commission's EM&V requirements established in the 442 Docket for a program that has cost ratepayers \$23,641,030 over a five year period.

24. The Commission's order in the 442 Docket explained that there are three types of evaluation: impact evaluation, market effect evaluation, and process evaluation. According to the Commission's order, EM&V begins with verifying that an energy-efficiency program is doing what it is supposed to do. Then the program effect and cost are measured. The final step, evaluation, involves taking the measurements and comparing them to the baseline or the goals set for the program.¹⁴

25. While Westar's Power Point presentations provide some useful summary data, these Power Point presentations fail to meet the EM&V standards as established by the Commission in the 442 Docket. These Power Point presentations do not provide any verification of the program meeting established goals; they do not provide any cost data or measurement of

¹⁴ Docket No. 08-GIMX-442-GIV, June 2, 2008, *Order Setting Energy Efficiency Policy Goals, Determining a Benefit-Cost Test Framework, and Engaging a Collaborative Process to Develop Benefit-Cost Test Technical Matters and an Evaluation, Measurement, and Verification Scheme*, at ¶46 and 48.

cost versus benefit; they do not provide any measurement of savings per cycling event that can be compared to a baseline or goals for the program.

26. Westar's suggestion that Power Point presentations clearly comply "with its obligations to conduct EM&V in accordance with the guidance that has been provided by the Commission"¹⁵ is disingenuous. Westar should be required, at minimum, to prepare and present EM&V reports that meet the definitions established by the Commission in the 442 Docket.

27. In Staff's Reply, Staff recommends the Commission direct Staff to evaluate the need to open an evaluation docket for Westar's energy-efficiency programs. CURB contends that this recommendation is unnecessary because the Commission has already determined that an EM&V of Westar's programs needs to be completed.

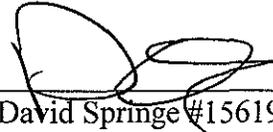
28. In Westar's 2013 EER, the Commission agreed that an "EM&V review on the prudence of Westar's energy-efficiency and demand response programs should be done."¹⁶ It is unnecessary for the Commission to direct Staff to evaluate the need for an evaluation. CURB continues to recommend that the Commission order Westar to conduct an EM&V of its energy-efficiency programs, as established by the 442 Docket.

29. CURB continues to recommend the Commission approve each of the recommendations offered in Ms. Stacey Harden's September 29, 2014, *Reply to Staff's Report and Recommendation*.

¹⁵ Docket No. 15-WSEE-021-TAR, Westar's *Response to CURB's Reply to Staff's Report and Recommendation*, at ¶18.

¹⁶ Docket No. 14-WSEE-030-TAR. October 15, 2013, *Order Approving Westar's Energy Efficiency Rider*, at ¶7.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "David Springe", is written over a horizontal line.

David Springe #15619

Niki Christopher #19311

Citizens' Utility Ratepayer Board

1500 SW Arrowhead Road

Topeka, KS 66604

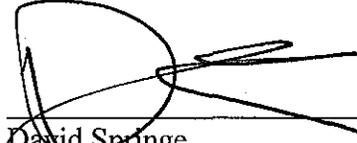
(785) 271-3200

(785) 271-3116 Fax

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I, David Springe, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.



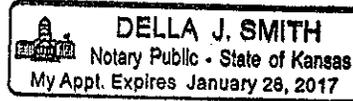
David Springe

SUBSCRIBED AND SWORN to before me this 17th day of October, 2014.



Notary Public

My Commission expires: 01-26-2017.



Appendix A

Referenced Data Requests

CURB 5

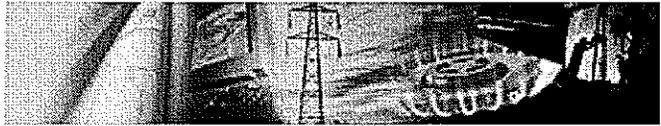
CURB 6

CURB 7

CURB 9

CURB 10

CURB 11



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Thursday, August 28, 2014
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Docket: [15-WSEE-021-TAR] Energy Efficiency Rider - 2014
Requestor: [CURB] [David Springe]
Data Request: CURB-5 :: Building Operator's Cert. Program
Date: 0000-00-00

Question 1 (Prepared by Gelene Tiller)

In Westar's application in KCC Docket No. 09-WSEE-738-MIS (Building Operator Certification Program), Appendix A, Westar indicated that "EM&V will be conducted internally for the program's first year using a combination of completed project information provided by program participants and a case study conducted by MEEA. An external vendor will be selected to conduct EM&V for subsequent years." a. Did Westar complete the internal EM&V as stated in the application? If yes, please provide a copy of the internal EM&V report and analysis. b. Did Westar conduct an internal EM&V for subsequent years? If yes, please provide a copy of the internal EM&V report and analysis. c. Has Westar contracted with an external vendor to conduct EM&V for subsequent years? d. If an external vendor has completed an EM&V of this program, please provide a copy of the EM&V report and analysis.

Response:

a. In the Order Adopting Energy Efficiency Program EM&V RFP and Procedures in Docket No. 10-GIMX-013-GIV, it stated in the RFP "The Commission determined that the educational programs will not be subject to impact evaluations, but shall initially undergo process evaluations used to determine whether the program is being implemented in an efficient manner." (at pg. 22). Westar completed an initial internal evaluation of the BOC program as stated in this Order. See the attached Powerpoint for the summary outcome and the Excel spreadsheet for the questions. b. Evaluations were not completed, or required for subsequent years. c. No d. N/A

Attachment File Name	Attachment Note
2012 boc satisfaction survey revised 010313.pptx	
BOC Survey Analytics Original 122012.xlsx	

Original: 12/21/2012



2012 BUILDING OPERATOR CERTIFICATION (BOC) PROGRAM EVALUATION SURVEY

December 2012

OBJECTIVES

- Measure & track customer satisfaction using the BOC Program Evaluation survey
- Identify and measure the effects of various drivers on overall satisfaction
- Solicit recommendations to improve the program

DATA

- Survey participants (N = 72)
- Questions on a scale of 1 (poor) to 5 (excellent)
- 5-point Likert scale converted to percent scale

CUSTOMER SATISFACTION & DRIVERS

- Overall Satisfaction Score
 - Comparison with other training programs
 - Overall quality of class
 - Recommend BOC to others
- Customer Satisfaction Drivers
 - Value
 - Program Support
 - Classes
 - Projects

CUSTOMER SATISFACTION DRIVERS

<ul style="list-style-type: none"> ▪ Value <ul style="list-style-type: none"> • Improve job performance • Add value to career ▪ Classes <ul style="list-style-type: none"> • Facility & room setup • Class size • Frequency of classes 	<ul style="list-style-type: none"> ▪ Program Support <ul style="list-style-type: none"> • Food & drink • Communication & coordination ▪ Projects <ul style="list-style-type: none"> • In-facility projects • Project feedback
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BOC SATISFACTION MODEL

Adjusted R-Square = 0.47

#2012
 #2011
 #2010
 #2008

TALE OF THE TAPE

	Westar	Salina I	Wichita I	Topeka I	Parsons II	Wichita II
Overall Satisfaction	84	86	84	81	84	89
Value	82	82	81	78	82	89
Program Support	90	96	90	88	89	91
Clarity	83	87	86	82	85	85
Projects	80	77	81	76	83	84

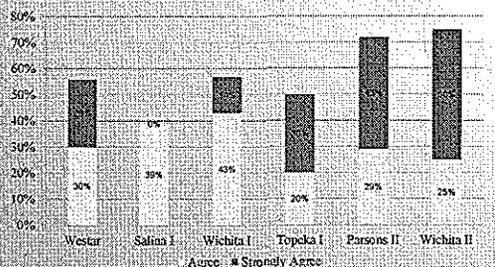
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PROJECTS & FEEDBACK

	Westar	Salina I	Wichita I	Topeka I	Parsons II	Wichita II
In-Facility projects	80	80	78	78	79	85
Project feedback	79	78	83	78	85	82

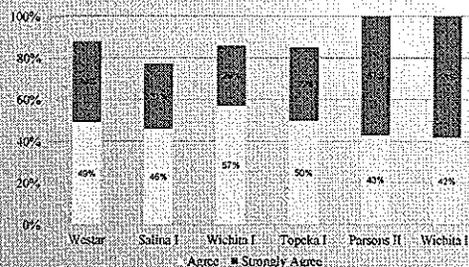
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ELECTRONIC VERSION OF PROJECT WORKBOOK



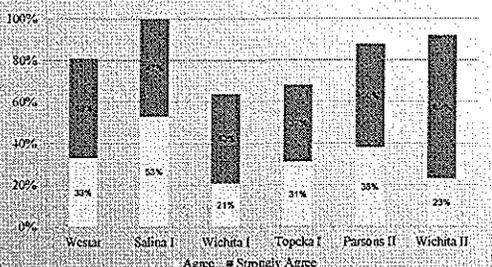
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MAINTAIN BOC CERTIFICATION



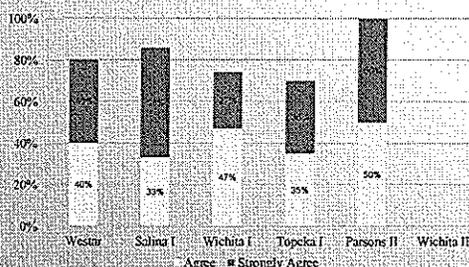
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LUNCH & LEARN

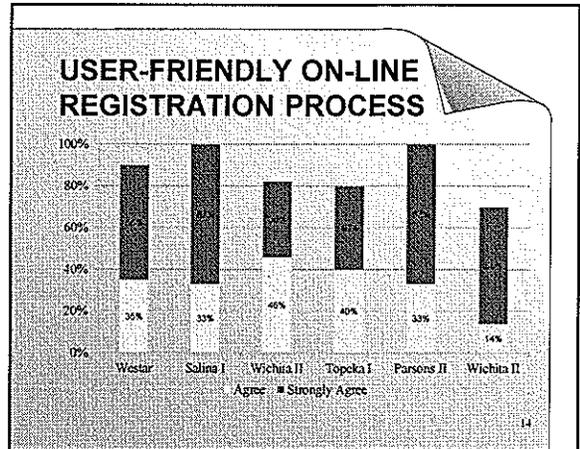
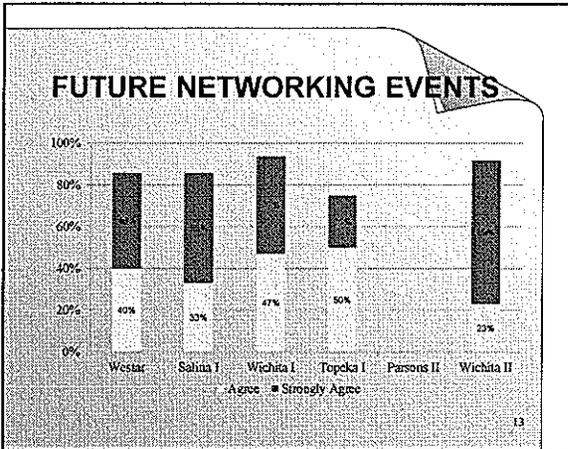


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BOC LEVEL II



12



- ### COMMENTS & SUGGESTIONS
- Keep curriculum up to date with tech developments
 - Facility too cold (Salina)
 - Class size a little too large (Topeka)
 - Shorter class times; less breaks would allow quicker finish on class day
 - Reimbursement required extensive documentation & time spent as the Wichita Workforce Center
 - Would like to review workbook material before class
 - Drop homework in favor of class project
 - More hands on & less theory (BOC Level II)
- 15



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Docket: [15-WSEE-021-TAR] Energy Efficiency Rider - 2014
Requestor: [CURB] [David Springe]
Data Request: CURB-6 :: EEDR
Date: 0000-00-00

Question 1 (Prepared by Rebecca Fowler)
In Westar's application in KCC Docket No. 10-WSEE-141-TAR (Energy Efficiency Demand Response Program Rider), Appendix B, Westar indicated that "Evaluation, measurement and verification will be conducted internally using personnel and equipment (MV-90 load research meters) that are already in place, so no additional costs are anticipated." a. Did Westar complete the internal EM&V as stated in the application? If yes, please provide a copy of the internal EM&V report and analyses conducted for this program.
Response:
No formal evaluation has been done; however, we have asked and Occidental has responded and curtailed or cogenerated when requested.
No Digital Attachments Found.

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Docket: [15-WSEE-021-TAR] Energy Efficiency Rider - 2014
Requestor: [CURB] [David Springe]
Data Request: CURB-7 :: WattSaver
Date: 0000-00-00

Question 1 (Prepared by Rebecca Fowler)

In Westar's application in KCC Docket No. 09-WSEE-636-TAR (WattSaver), Appendix A, Westar indicated that it will "EM&V will be conducted internally for the program's first year using interval data from 60 MV-90 meters plus information downloads from 150 additional thermostats. An external vendor will be selected to conduct EM&V for subsequent years." a. Did Westar complete the internal EM&V as stated in the application? If yes, please provide a copy of the internal EM&V report and analysis. b. Did Westar conduct an internal EM&V for subsequent years? If yes, please provide a copy of the internal EM&V report and analysis. c. Has Westar contracted with an external vendor to conduct EM&V for subsequent years? d. If an external vendor has completed an EM&V of this program, please provide a copy of the EM&V report and analysis

Response:

a) Yes, see attached b) Yes, see attached files for EM&V reports for 2010, 2011, 2012. An EM&V study was not conducted for 2013 because it was not required by the orders in Dockets No. 08-GIMX-442-GIV and 09-WSEE-636-TAR. c) No, all evaluations have been done with internal resources. d) N/A

Attachment File Name	Attachment Note
WattSaver Program M&V 2010.pptx	
WattSaver Program M&V 2011.pptx	
WattSaver Program M&V 2012.pptx	

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WATTS AVER PROGRAM: POST CYCLING M&V

December 2010



GOALS

- Estimate per capita avoided capacity (kW) savings for the 2010 cycling season
- Recommend measures to expedite data generation process for future M&V activities

THEORETICAL MODEL

$$kW = f(\text{temperature, group dummy,}$$

$$\text{employee (cross-section) dummies,}$$

$$\text{event (time-series) dummies)}$$

METHODOLOGY

- Pooled data (cross-section & time series)
 - 216 customers (test=43 & control=173)
 - 18 hours (June 17, July 14, 19, 22 & 23)
- Data Variables
 - Average hourly kW during cycling event
 - Peak Temperature (Wichita, Topeka, Salina, Manhattan, Lawrence, Leavenworth, Olathe, Hutchinson, Emporia, Pittsburg)
 - Pilot Group Dummy (Test=1; Control=0)

METHODOLOGY (continued)

- Data Adjustments
 - Honeywell Sample (Test Group) – invalid address – non-response to load management commands; thermostats installed after cycling season
 - Load Research Sample (Control Group) – excluded RACs & apartments
- Fixed Effects vs. Random Effects Model

RESULTS

▪ Capacity Savings (kW) Model

$$kW = -2.857 + 0.071 * \text{Temp} - 0.858 * \text{Group} \\ + \{\text{Cross-Section Dummy Results}\} \\ + \{\text{Time Series Dummy Results}\}$$

- Per Capita kW Savings Adjusted for Transmission Line Loss = $0.858/0.93 = 0.923$

RECOMMENDATIONS

- Uniform data format -- Westar & Honeywell IT collaboration
- Automate temperature data generation from external weather source
- Test remote application to correct invalid addressing -- roughly 20 percent of WattSaver customers

**WATTS AVER PROGRAM:
POST CYCLING M&V**

June 2012



GOALS

- Estimate per capita avoided capacity (kW) savings for the 2011 cycling season
- Implement initiatives to enhance data generation process for future M&V activities

THEORETICAL MODEL

$$kW = f(\overset{+}{\text{temperature}}, \overset{-}{\text{group dummy}},$$

 employee (cross-section) dummies,
 event (time-series) dummies)

METHODOLOGY

- Pooled data (cross-section & time series)
 - 412 customers (test=240 & control=172)
 - 21 hours (June 6, 7 & 30, Aug. 2, Sept. 1 & 2)
- Data Variables
 - Average hourly kW during cycling event
 - Peak Temperature (Wichita, Topeka, Salina, Manhattan, Lawrence, Leavenworth, Olathe, Hutchinson, Emporia, Pittsburg)
 - Pilot Group Dummy (Test=1; Control=0)

METHODOLOGY (continued)

- Data Adjustments
 - Honeywell Sample (Test Group) – excluded thermostats installed after cycling season
 - Load Research Sample (Control Group) – excluded RACs & unoccupied premises
- Fixed Effects vs. Random Effects Model

RESULTS

- Capacity Savings (kW) Model

$$kW = 3.552 + 0.007 * \text{Temp} - 0.890 * \text{Group}$$

+ {Cross-Section Dummy Results}
+ {Time Series Dummy Results}
- Per Capita kW Savings Adjusted for Transmission Line Loss = $0.890/0.93 = 0.957$

ENHANCEMENTS

- ✓Uniform data format – collaborative work on a SIR to automate data download process
- XAutomate temperature data generation from external weather source
- ✓Automate data reformats -- developed a VBA macro to stack data

WATTSAVER PROGRAM: POST CYCLING M&V

September 2013



1

GOALS

- Estimate per customer peak load (kW) reduction for single family, multi-family & small commercial customers
- Calculate a composite per-customer & total peak load reduction directly attributable to the program

2

THEORETICAL MODEL

$$kW = f(\text{temperature}, \text{group dummy}, \text{employee (cross-section) dummies}, \text{event (time-series) dummies})$$

3

METHODOLOGY

- Pooled data (cross-section & time series)
 - 578 customers (test=384 & control=194)
 - Single-Family, Multi-Family & Small Commercial customers
 - 8 hours (July 19 & 26)
- Data Variables
 - Average hourly kW during cycling events
 - Peak Temperature (Wichita, Topeka, Salina, Manhattan, Lawrence, Leavenworth, Olathe, Hutchinson, Emporia, Pittsburg)
 - Group Dummy (WattSaver Sample Test=1; Load Research Sample Control=0)

4

METHODOLOGY (continued)

- Data Adjustments
 - WattSaver Sample (Test Group) – excluded thermostats installed after cycling season
 - Load Research Sample (Control Group) -- excluded RACs, No ACs & unoccupied premises
- Random Effects Models
 - Single-Family, Multi-Family & Small Commercial Models
 - SAS – TSCSREG Procedure

5

RESULTS

Customer Type	Per Customer Load Reduction (kW)*	Number of Participants**	Total Peak Reduction (MW)
Single-Family	0.84	48,018	40
Multi-Family	0.43	7,002	3
Small Commercial	3.98	1,609	6
Composite	0.88	56,629	50

* Adjusted for 7% transmission line loss
 ** As of September 6, 2013

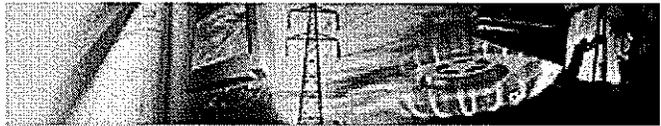
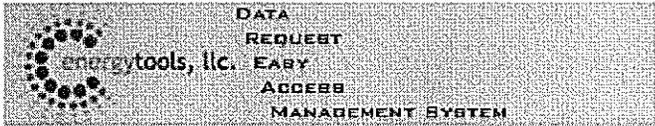
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BENCHMARKS

- **Average per-customer load reduction of 0.8 to 1.5 kW for residential DLC programs; range from 0.2 to 1.7 kW**
- **Average per-customer impact of 2.0 to 4.0 kW for small C&I DLC programs; range from 0.4 to 8.6 kW**

Source: The Brattle Group, "Direct Load Control of Residential Air Conditioners in Texas", October 25, 2012

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Thursday, August 28, 2014
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Docket: [15-WSEE-021-TAR] Energy Efficiency Rider - 2014
Requestor: [CURB] [David Springe]
Data Request: CURB-8 :: Simple Savings
Date: 0000-00-00

Question 1 (Prepared by Gelene Tiller)

In Westar's application in KCC Docket No. 10-WSEE-775-TAR (Simple Savings), Appendix A, Westar indicated that it will "rely on the State Energy Office to perform EM&V as it deems necessary." a. Has the State Energy Office conducted an EM&V of the Westar Simple Savings Program? If yes, please provide a copy of the EM&V report and analysis.

Response:

We are unsure if the State Energy Office conducted an EM&V. You will need to contact the State Energy Office. We believe they conducted some cost effectiveness studies, but you will need to contact them for the information and results.

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Thursday, September 04, 2014
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Docket: [15-WSEE-021-TAR] Energy Efficiency Rider - 2014
Requestor: [CURB] [David Springe]
Data Request: CURB-9 :: Wattsaver Budget
Date: 0000-00-00

Question 1 (Prepared by n/a)

The WattSaver program was approved in May 2009 using a 5-year budget estimate of \$26,034,005. More than 5 years have passed since the WattSaver program was initially approved. Please answer the following questions pertaining to the WattSaver program: a. Has Westar completed a new operating budget for the WattSaver program? b. If yes, please provide the new operating budget for the WattSaver program. Please include estimated participation levels, contractor costs, and any additional marketing or program incentive costs. c. If no, is Westar proposing to terminate this program or to continue offering the WattSaver program?

Response:

a) Yes b) Westar has a contract with Honeywell through July 31, 2015 for an estimated \$1.5M annually for new installations and on-going monitoring services. Current participation levels are at 58,128 through July, 2014. An average of 50 new installations a month are expected through July 31, 2015. There is no anticipated additional marketing or program incentive costs for the WattSaver program. Contractor costs, including customer satisfaction surveys, are estimated to be around \$1M through July 31, 2015. c)N/A

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Docket: [15-WSEE-021-TAR] Energy Efficiency Rider - 2014
Requestor: [CURB] [David Springe]
Data Request: CURB-10 :: Building Operator Cert Budget
Date: 0000-00-00

Question 1 (Prepared by Rebecca Fowler)

The Building Operator Certification program was approved in August 2009 using a 5-year budget estimate of \$832,589. Please answer the following questions pertaining to the Building Operator Certification program: a. Has Westar completed a new operating budget for the Building Operator Certification program? b. If yes, please provide the new operating budget for the Building Operator Certification program. Please include estimated participation levels, contractor costs, and any additional marketing or program incentive costs. c. If no, is Westar proposing to terminate this program or to continue offering the Building Operator Certification program? d. Based upon previous EER applications, the actual program expenditures for the Building Operator Certification program are \$306,583.01. Please explain why actual expenses are less than half the estimate provided by Westar in Docket No. 09-WSEE-738-MIS.

Response:

a) Yes b) The 5-Year Budget for 2015-2020 includes \$73,312 for tuition rebates, \$546,500 for contractor costs and other vendor costs, \$30,725 for EM&V study, and \$75,000 for internal program administration. Westar estimates future participation level of 15 per series. We project 2-3 series per year. Each participant continues to receive tuition reimbursement of \$575 for successfully completing program assignments, tests and attending all sessions. c) N/A d) The program has been able to use in-state instructors to reduce actual costs as compared to budget. Additionally, an EM&V study has not been performed, but the cost for an EM&V study was included in the original program budget.

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Docket: [15-WSEE-021-TAR] Energy Efficiency Rider - 2014
Requestor: [CURB] [David Springe]
Data Request: CURB-11 :: Energy Efficiency Education Program Budget
Date: 0000-00-00

Question 1 (Prepared by Rebecca Fowler)

The Energy Efficiency Education program was approved in August 2009 using a 5-year budget estimate. Please answer the following questions pertaining to the Energy Efficiency Education program: a. Has Westar completed a new operating budget for the Energy Efficiency Education program? b. If yes, please provide the new operating budget for the Energy Efficiency Education program. Please include estimated participation levels, contractor costs, and any additional marketing or program incentive costs. c. If no, is Westar proposing to terminate this program or to continue offering the Energy Efficiency Education program?

Response:

a) Yes b) Education program activities previously included in the EER have been scaled back to include basic costs, such as the reprinting of educational materials and participation in strategic community forums and events. The projected annual budgeted for education activities is expected to continue at the current year spending level of approximately \$60K. Costs -Marketing and Educational materials and incentives: \$50K -Participation in community forums and events: \$10K Estimated Participation Levels -2,000 Contractor Costs -N/A c) N/A

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CERTIFICATE OF SERVICE

15-WSEE-021-TAR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 17th day of October, 2014, to the following:

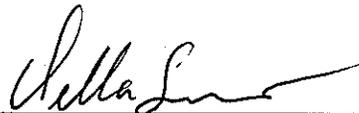
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