

2. On November 20, 2007 the Commission approved a Stipulation and Agreement in Docket No. 07-KCPE-905-RTS (“07-905 S&A”) that provides KCP&L the ability to recover demand-side management (“DSM”) program costs through an EE Rider. The 07-905 S&A requires KCP&L to make its EE Rider filings by March 31 of each year.

3. Since adoption of the EE Rider in 2007, KCP&L has adjusted its EE factor each year accordingly with the exception of its prior four filings in Docket Nos. 15-KCPE-448-TAR (“15-448 Docket”), 16-KCPE-439-TAR (“16-439 Docket”), 17-KCPE-446-TAR (“17-446 Docket”) and 18-KCPE-420-TAR (“18-420 Docket”). In Docket Nos. 15-448, 16-439 and 17-446, the Company requested and was granted continued deferral of unrecovered amounts until the following filing year. In Docket No. 18-420, that covered DSM program costs incurred during the period of January 1, 2017 through December 31, 2017, KCP&L again requested continued deferral treatment, and stated that the Company intended to request recovery of the unrecovered program costs through an amortization in its current general rate case, Docket No. 18-KCPE-480-RTS (“18-480 Docket”). Again, the Commission approved KCP&L’s request to continue deferral of KCP&L’s unrecovered DSM expenses for inclusion in KCP&L’s general rate case or a future EE Rider tariff filing in the event the Commission did not approve recovery of the costs in the 18-480 Docket. As a result of rate case negotiations in the 18-480 Docket, KCP&L was not granted recovery of DSM costs through an amortization in base rates. As such, KCP&L is seeking recovery of these costs through this EE Rider tariff filing.

4. KCP&L hereby files for Commission approval of the Company’s 2018 DSM program costs and its proposed 2019 EE Rider tariff. KCP&L’s spend on DSM programs in 2018 was \$248,280. As part of its annual EE Rider filing, KCP&L also includes its over/under-recovery of costs from two years prior – in this case 2016 costs which were recovered over the period July 1, 2017 through June 30, 2018. KCP&L determined that it under-recovered its 2016 DSM costs by \$302,475. The sum of these values, 2018 DSM program costs of \$248,280 plus the approved deferred 2017 DSM program costs of \$785,822 plus \$79 in actual recovered 2016 DSM program costs recovered through normal proration billing, net to a total of \$1,034,181 of unrecovered DSM

costs. The table below details the amount of unrecovered DSM costs from the previous above-mentioned EE Rider tariff filings.

Year	Program Costs	Collected/Billed	Unrecovered Deferral	Docket No.
2013	\$ 827,410	\$ (889,448)	\$ (62,037)	14-KCPE-442-TAR
2014	\$ 304,972	\$ (253,144)	\$ 51,827	15-KCPE-448-TAR
2015	\$ 241,182	\$ (35,809)	\$ 205,373	16-KCPE-439-TAR
2016	\$ 286,457	\$ 315	\$ 286,772	17-KCPE-446-TAR
2017	\$ 303,887	\$ 79	\$ 303,966	18-KCPE-420-TAR
2018	\$ 248,280	\$ -	\$ 248,280	19-KCPE-___-TAR
Total Deferred DSM Costs			\$ 1,034,181	

5. Attached to this Application as **Exhibit A** is the proposed 2019 update of the second sheet for KCP&L's EE Rider tariff, Schedule EE. This tariff reflects KCP&L's proposal to set the EE factors for each class at \$0.00018/kWh for Residential customers, \$0.00016/kWh for Small General customers, \$0.00015/kWh for Medium General customers and \$0.00014/kWh for Large General customers effective July 1, 2019 through June 30, 2020.

6. In compliance with the Commission's Order Amending Procedural Schedule filed December 15, 2016 in the 16-446 Docket, paragraph 9(b) and Ordering paragraph B, KCP&L has included an analysis of expenditures associated with its existing DSM programs in this application as confidential **Exhibit B**. Consistent with KCP&L's Motion to File Out of Time Its Response to CURB, filed December 13, 2016 in that docket, KCP&L is filing its workpapers showing the analysis of expenditures requested for recovery.¹ These workpapers are consistent with the workpapers KCP&L has always provided Staff associated with its annual EE Rider filings.

¹ On November 28, 2016, in the 16-446 Docket, CURB filed its CURB's Response to Kansas City Power & Light Company's Motion to Extend Existing Demand Side Management Programs and Budgets which, in part, recommended that the Commission order KCP&L to file "an analysis of expenditures associated with its six DSM programs in its March 1, 2017 Energy Efficiency Rider application". CURB did not further define such proposed "analysis of expenditures." KCP&L responded to CURB's Response on December 13, 2016 indicating that it would

7. In summary, KCP&L requests that the Commission approve EE factors effective July 1, 2019 through June 30, 2020 at \$0.00018/kWh for the Residential customer class, \$0.00016/kWh for the Small General customer class, \$0.00015/kWh for the Medium General customer class and \$0.00014/kWh for the Large General customer class.

8. Certain information included in **Exhibit B** is confidential and KCP&L requests that it be treated as such by the Commission and Staff pursuant to K.S.A. 66-1220a and K.A.R. 82-1-221a. K.S.A. 66-1220a limits the disclosure of trade secrets or confidential commercial information of regulated entities. K.A.R. 82-1-221a also provides standards for the safekeeping of a regulated entity's confidential commercial information. The information denoted as confidential contained in the **Exhibit B** and submitted to Staff is confidential because it contains information that has not be disclosed to the public and, if disclosed, could place KCP&L at a competitive disadvantage in negotiating future energy efficiency and demand-side management contracts. As such, KCP&L hereby requests that the Commission issue a Protective Order in this docket to govern the disclosure and dissemination of confidential information.

9. In addition to signatory counsel, communications and correspondence in regard to this Application should be addressed to:

Lisa Starkebaum
Manager, Regulatory Affairs
Kansas City Power & Light Company
One Kansas City Place
1200 Main Street, 19th Floor
Kansas City, MO 64105
(816) 556-2209
(816) 556-2110 Fax
lisa.starkebaum@kcpl.com

file the analysis of expenditures normally provided to Staff with its annual EE Rider filings and, if CURB was recommending something other than this normal expenditure analysis, then KCP&L objected. CURB did not respond to KCP&L's filing and the Commission did not address a definition of the required "analysis" in its Order. Therefore, KCP&L has interpreted CURB's silence and the Commission's Order as agreement that the normal analysis is compliant.

Anthony Westenkirchner
Sr. Paralegal, Regulatory Affairs
Kansas City Power & Light Company
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1200 Main Street, 16th Floor
Kansas City, MO 64105
(816) 556-2668
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anthony.westenkirchner@kcpl.com

WHEREFORE, KCP&L respectfully requests the Commission approve the proposed Energy Efficiency Rider factors and tariff sheet to be effective July 1, 2019 through June 30, 2020.

Respectfully submitted,

/s/ Robert J. Hack

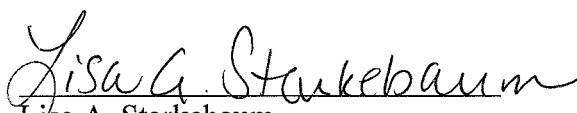
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**COUNSEL FOR KANSAS CITY
POWER & LIGHT COMPANY**

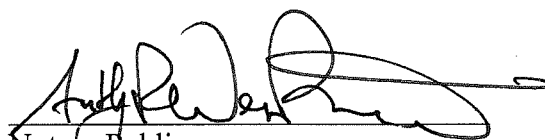
VERIFICATION

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

The undersigned, Lisa A. Starkebaum, upon oath first duly sworn, states that she is the Manager, Regulatory Affairs of Kansas City Power & Light Company, that she has reviewed the foregoing Application, that she is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of her knowledge and belief.


Lisa A. Starkebaum
Manager, Regulatory Affairs
Kansas City Power & Light Company

Subscribed and sworn before me this 29th day of March 2019.


Notary Public

My commission expires:

4/26/2021



KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 15 Sheet 2Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed December 13, 2018No supplement or separate understanding
shall modify the tariff as shown hereon.Sheet 2 of 2 Sheets**ENERGY EFFICIENCY RIDER
Schedule EE (Continued)****ENERGY EFFICIENCY RIDER AMOUNT CALCULATION: (Continued)**

$TRUE_{n-1}$ = The annual true-up amount for an EE Rider year, to be determined prior to filing the next EE Rider and to be applied to the subsequent EE factor calculation. The true-up amount will reflect any difference between the total EE revenue collected and the actual costs (EEC_n) for the previous applicable time-period (n-1). Such true-up amount may be positive or negative. The true-up amount used to calculate the EEF for the first EE Rider equals zero.

$DA_{(class)}$ = The demand allocator for the applicable non-lighting classes. This demand allocator shall be based on the 12-CP allocator utilized by the Company for its Class Cost of Service Study in the most recent Kansas retail rate case.

$KWH_{n(class)}$ = The actual kWh electric sales for the Kansas jurisdiction for the applicable time-period (n) of the Class Cost of Service Study for the applicable class.

TERM:

This EE Rider shall remain in effect until such time the Commission-approved amount is recovered. In the event the Commission rules on, or a law is passed regarding treatment of such expenses, then KCPL shall have the right to file for Commission approval of a compliant recovery methodology to replace or revise this EE Rider. KCPL shall have the right to continue recovery under this EE Rider until such time a replacement methodology is approved and implemented or all Commission-approved amounts are recovered.

NOTES TO THE TARIFF:

1. The references to Accounts within the EE tariff are as defined in the FERC uniform system of accounts.
2. The EEC factor will be expressed in dollars per kilowatt-hour (kWh) rounded to five decimal places.

EE FACTORS FOR JULY 1, 2019 THROUGH JUNE 30, 2020 USAGE:

- | | | |
|----|------------------------|---------------|
| 1. | Residential Service | \$0.00018/kWh |
| 2. | Small General Service | \$0.00016/kWh |
| 3. | Medium General Service | \$0.00015/kWh |
| 4. | Large General Service | \$0.00014/kWh |

Issued: March 29, 2019

Month Day Year

Effective: July 1, 2019

Month Day Year

By: /s/ Darrin R. Ives

Vice President

Title

KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 15 Sheet 2

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed ~~March 29, 2018~~ December 13, 2018No supplement or separate understanding
shall modify the tariff as shown hereon.

Sheet 2 of 2 Sheets

**ENERGY EFFICIENCY RIDER
Schedule EE (Continued)****ENERGY EFFICIENCY RIDER AMOUNT CALCULATION: (Continued)**

$TRUE_{n-1}$ = The annual true-up amount for an EE Rider year, to be determined prior to filing the next EE Rider and to be applied to the subsequent EE factor calculation. The true-up amount will reflect any difference between the total EE revenue collected and the actual costs (EEC_n) for the previous applicable time-period (n-1). Such true-up amount may be positive or negative. The true-up amount used to calculate the EE factor for the first EE Rider equals zero.

$DA_{(class)}$ = The demand allocator for the applicable non-lighting classes. This demand allocator shall be based on the 12-CP allocator utilized by the Company for its Class Cost of Service Study in the most recent Kansas retail rate case.

$KWH_{n(class)}$ = The actual kWh electric sales for the Kansas jurisdiction for the applicable time-period (n) of the Class Cost of Service Study for the applicable class.

TERM:

This EE Rider shall remain in effect until such time the Commission-approved amount is recovered. In the event the Commission rules on, or a law is passed regarding treatment of such expenses, then KCPL shall have the right to file for Commission approval of a compliant recovery methodology to replace or revise this EE Rider. KCPL shall have the right to continue recovery under this EE Rider until such time a replacement methodology is approved and implemented or all Commission-approved amounts are recovered.

NOTES TO THE TARIFF:

1. The references to Accounts within the EE tariff are as defined in the FERC uniform system of accounts.
2. The EEC factor will be expressed in dollars per kilowatt-hour (kWh) rounded to five decimal places.

EE FACTORS FOR JULY 1, ~~2018-2019~~ THROUGH JUNE 30, ~~2019-2020~~ USAGE:

- | | | |
|----|------------------------|---|
| 1. | Residential Service | \$0. 00000000 <u>0018</u> /kWh |
| 2. | Small General Service | \$0. 00000000 <u>0016</u> /kWh |
| 3. | Medium General Service | \$0. 00000000 <u>0015</u> /kWh |
| 4. | Large General Service | \$0. 00000000 <u>0014</u> /kWh |

Issued: ~~December 13, 2018~~ March 29, 2019

Month Day Year

Effective: ~~December 20, 2018~~ July 1, 2019

Month Day Year

By: /s/ Darrin R. Ives

Vice President

Title

Kansas City Power & Light Company
Kansas Energy Efficiency Program Costs (Account 182441)
January 1, 2018 through December 31, 2018

	<u>2018</u>
2018 Program Costs, see tab 182441 Detail	\$ 248,280.31
2016 Deferred DSM Costs to be Recovered per 17-KCPE-446-TAR, see tab 17-18 EER Collection	302,474.76
2016 Vintage recovered in July 1, 2017 - June 30, 2018, see tab 17-18 EER Collection*	79.11
2017 Deferred DSM Cost to be Recovered per 18-KCPE-420-TAR, see tab 18-19 EER Collection	483,346.83
Total 2018 DSM Costs to be Recovered	<u>\$ 1,034,181.01</u>

Reconciliation of Account 182441 to EE Rider Filings:

2018 DSM Costs to be Recovered	\$ 248,280.31
Approved DSM Costs Deferred per Order in Docket No. 18-KCPE-420-TAR	785,821.59
2016 Vintage recovered in July 1, 2017 - June 30, 2018*	79.11
Total Deferred Account 182441	<u>\$ 1,034,181.01</u>

-

*The Kansas EE factor was set at \$0.00000/kWh, per Order in Docket No. 16-KCPE-439-TAR. Amounts for July 2017 through June 2018 represent prorated cancel / rebills from prior periods.

Public

Program Activity Detail

(Account 182441) - January 1, 2018 through December 31, 2018

<u>Project</u>	<u>Description</u>	<u>Cost Category</u>	<u>2018</u>
SI0000	Strategic Initiative Program - EMV Costs	Company Labor Company Non-Labor Contractor Costs	
	SI0000 Total		
SIA002	Low Income Weatherization	Company Labor Company Non-Labor Contractor Costs	
	SIA002 Total		
SID001	A/C Cycling	Company Labor Company Non-Labor Contractor Costs	
	SID001 Total		
SID002	C&I Curtailment	Company Labor Company Non-Labor Contractor Costs	
	SID002 Total		
SIE001	Residential On-line Analysis	Company Labor Company Non-Labor Contractor Costs	
	SIE001 Total		
SIE004	Cool Homes	Company Labor Company Non-Labor Contractor Costs	
	SIE004 Total		
SIE005	Energy Star Homes	Company Labor Company Non-Labor Contractor Costs	
	SIE005 Total		
SIE020	Commercial on-line analysis	Company Labor Company Non-Labor Contractor Costs	
	SIE020 Total		
SIE021	C&I Energy Audit	Company Labor Company Non-Labor Contractor Costs	
	SIE021 Total		
SIE022	C&I Custom Rebate - Retrofit	Company Labor Company Non-Labor Contractor Costs	
	SIE022 Total		
SIE023	C&I Custom Rebate- New Constr	Company Labor Company Non-Labor Contractor Costs	
	SIE023 Total		
SIE024	Building Operator Certification	Company Labor Company Non-Labor Contractor Costs	
	SIE024 Total		
		Company Labor	-
		Company Non-Labor	-
		Contractor Costs	\$ 248,280.31
		Total	\$ 248,280.31

The C&I Energy Audit and Custom Rebates, Cool Homes and ENERGY STAR® New Homes program tariffs are currently frozen.

Kansas City Power & Light Company
Kansas Energy Efficiency Program Cost Recovery (Account 182441)
July 1, 2017 through June 30, 2018

Per 2017 EER Order \$ 302,474.76
(2016 vintage and 2014 under/(over))

Per Docket No. 17-KCPE-446-TAR

2016 Program Costs		\$ 286,456.50
2014 Program Costs	\$ 51,827.36	
2014 Collection	\$ (35,809.10)	
2014 Under/(Over)		<u>16,018.26</u>
		<u>\$ 302,474.76</u>

Recovered through EER¹

July 2017	\$ 0.01
August 2017	0.01
September 2017	52.46
October 2017	2.22
November 2017	1.73
December 2017	-
January 2018	-
February 2018	22.68
March 2018	-
April 2018	-
May 2018	-
June 2018	-
	<u>\$ 79.11</u>

Total under-recovered \$ 302,553.87

NOTES

- 1 The Kansas EE factor was set at \$0.00000/kWh, per Order in Docket No. 17-KCPE-446-TAR. Amounts for July 2017 through February 2018 represent prorated cancel / rebills from prior periods.

Kansas City Power & Light Company
Kansas Energy Efficiency Program Cost Recovery (Account 182441)
July 1, 2018 through June 30, 2019

Per 2018 EER Order \$ 483,346.83
 (2017 vintage and 2015 under/(over))

Per Docket No. 18-KCPE-420-TAR

2017 Program Costs		\$ 303,887.01
2015 Program Costs	\$ 179,144.36	
2015 Collection	\$ 315.46	
2015 Under/(Over)		<u>179,459.82</u>
		<u>\$ 483,346.83</u>

Recovered through EER¹

July 2018	\$	-	
August 2018		-	
September 2018		-	
October 2018		-	
November 2018		-	
December 2018		-	
January 2019		-	
February 2019		-	
March 2019			<i>no projection</i>
April 2019			<i>no projection</i>
May 2019			<i>no projection</i>
June 2019			<i>no projection</i>
	\$	-	

Total under-recovered \$ 483,346.83

NOTES

- 1 The Kansas EE factor was set at \$0.00000/kWh, per Order in Docket No. 18-KCPE-420-TAR.

Kansas Energy Efficiency Rider Calculation and Impact Workpaper

March 29, 2019

Inputs

Kansas 2018 DSM Expense \$ 1,034,181.01

Demand Allocation of DSM Expenses and Calculation of Class EER Rate

	Residential	Small General	Medium General	Large General	Lighting	Total
Demand Allocator (12 CP Method) ¹	50.2190%	5.8270%	11.2680%	31.8860%	0.8000%	100.0000%
Allocation without Lighting class	50.6240%	5.8740%	11.3590%	32.1430%		100.0000%
Allocated DSM Expense	\$ 523,543.79	\$ 60,747.79	\$ 117,472.62	\$ 332,416.80		\$ 1,034,181.01
Total kWh ²	2,847,796,936	379,290,426	758,322,278	2,366,184,952	54,013,182	6,405,607,774
EER Rate	\$ 0.00018	\$ 0.00016	\$ 0.00015	\$ 0.00014		

Typical Monthly Charge

	Residential	Small General	Medium General	Large General	Lighting
Typical Usage (kWh) ³	1,059	1,361	15,918	172,249	1,070
Typical Monthly EER Charge	\$ 0.19	\$ 0.22	\$ 2.39	\$ 24.11	

Typical Monthly Bill Impact

	Residential	Small General	Medium General	Large General	Lighting
Typical Monthly Bill before ECA,EER & TDC ⁴	\$ 119.11	\$ 162.22	\$ 1,495.82	\$ 12,156.65	\$ 139.16
Typical Monthly EER Charge	\$ 0.19	\$ 0.22	\$ 2.39	\$ 24.11	
% of Base Usage Charge	0.16%	0.13%	0.16%	0.20%	

Notes:

- 1 The 12 Coincident Peak (CP) allocator utilized by KCP&L for its Class Cost of Service Study (Docket No. 18-KCPE-480-RTS)
- 2 Class Normalized Billing Demands kWh - KCP&L Revenue Summary MFR Section 2 (18-KCPE-480-RTS)
- 3 Average Monthly kWh Usage per Customer - KCP&L Revenue Summary MFR Section 2 (18-KCPE-480-RTS)
- 4 Total class revenue divided by number of customers divided by 12 - KCP&L Revenue Summary MFR Section 2 (18-KCPE-480-RTS)

Kansas City Power & Light Company

Docket No.: 19-KCPE-____-TAR

Date: March 29, 2019

CONFIDENTIAL INFORMATION

The following information is provided to the Kansas Corporation Commission under
CONFIDENTIAL SEAL:

Document/Page	Reason for Confidentiality from List Below
Exhibit B, Tab "182441 Detail"	2, 5 and 6

Rationale for the "confidential" designation is documented below:

- "1" Confidential financial information/budget projections, the disclosure of which could affect the Company's standing in the capital markets and/or affect the Company's stock price and/or facilitate insider trading in violation of SEC rules and/or disadvantage the Company in its contract negotiations.
- "2" Contract terms or specifics, or contract information that could be used by existing or future vendors to the disadvantage of KCP&L.
- "3" Sensitive information that could impact pending or threatened litigation.
- "4" Advice of counsel or other paid experts, advisors or consultants falling under the attorney/client communication or work product privilege or information prepared in anticipation of hearing or other administrative proceedings.
- "5" Trade Secret or Commercially Sensitive Information, the disclosure of which would harm the Company competitively and prevent the Company from protecting such information as allowed under Kansas law.
- "6" Information which is contractually obligated to be kept private, which failure to do so could open the Company up to damages.
- "7" Critical Infrastructure Information which poses a security risk if made public.
- "8" Other (specify) _____.

Should any party challenge KCP&L's assertion of confidentiality with respect to the above information, KCP&L reserves the right to supplement the rationale contained herein with additional factual or legal information.