

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

AUG 16 2013

by
State Corporation Commission
of Kansas

In the Matter of the Application of Kansas)
City Power & Light Company for Approval) Docket No. 14-KCPE-042-TAR
To Extend its Demand-Side Management)
Programs.)

**OBJECTION OF KANSAS CITY POWER & LIGHT COMPANY
TO PETITION TO INTERVENE OF THE CLIMATE ENERGY PROJECT**

Kansas City Power & Light Company (“KCP&L” or the “Company”) hereby files its objection to the petition to intervene of Climate Energy Project (“CEP”) for consideration by the State Corporation Commission of the State of Kansas (“Commission” or “KCC”).

1. On July 18, 2013, KCP&L filed its Application in this matter seeking approval to extend, with minor modification, its six current Demand-Side Management (“DSM”) pilot programs for an additional two years. As explained in the Application, the filing was made in compliance with applicable requirements of Docket Nos. 08-GIMX-441-GIV (“441 Docket”) and 08-GIMX-442-GIV (“442 Docket”), and based on the Commission’s directives in Docket Nos. 11-KCPE-780-TAR (“780 Docket”) and 12-GIMX-337-GIV (“337 Docket”).¹ The six current DSM programs are as follows:

Portfolio of Existing Pilot DSM Programs:

- Low Income Weatherization Approved December 9, 2005
- Home Energy Analyzer Approved March 7, 2006
- Business Energy Analyzer Approved December 22, 2006
- Building Operator Certification Approved May 15, 2007

¹ Application, pp. 1-2, filed July 18, 2013.

- Energy Optimizer Approved January 10, 2006
- MPower Approved September 25, 2006

2. The filing does not seek approval of or investigation into additional DSM programs; only a two-year extension of the existing programs as listed above. KCP&L further explained that, upon approval of the extension, it plans to use the two-year extension to explore options for the future of its DSM program portfolio.²

3. On August 6, 2013, CEP filed its request for intervention in this matter. In its pleading, CEP stated it “intends to work with the parties to craft DSM programs that meet the needs of ratepayers to conserve energy consumption without unreasonable rate impacts and without causing unnecessary or unwarranted financial burdens on KCP&L.”³

4. KCP&L respectfully requests the Commission deny CEP’s intervention in this matter because the stated purpose of CEP’s intervention is beyond the scope of this proceeding. As explained previously, and in the Application, KCP&L initiated this proceeding for the limited purpose of extending its existing DSM programs for two years because (1) the Commission directed KCP&L to file for termination, modification, or permanent status of these programs following completion the 337 Docket⁴, (2) the programs are set to expire on January 3, 2014, and (3) KCP&L wishes to explore over the next two years the options for the future of the DSM programs. Because the nature of this proceeding will not provide the opportunity to “craft DSM programs”, CEP’s stated intention for intervention fails to demonstrate a legal right, duty,

² Application, p. 2.

³ Request to Intervene, ¶5, filed Aug. 6, 2013.

⁴ The Commission closed the 337 Docket on March 6, 2013, with no further action.

privilege, immunity or legal interest that may be substantially affected by the proceeding, as required by K.A.R. 82-1-225(a)(2).⁵

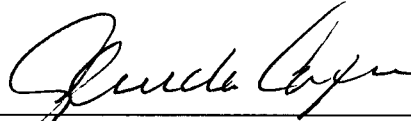
5. In the alternative, should the Commission elect to permit CEP's intervention in this proceeding, KCP&L respectfully requests the Commission limit its intervention to the scope of Application, which is a request by KCP&L for a two-year extension to its current DSM program portfolio.

WHEREFORE, KCP&L respectfully requests the Commission deny CEP's request to intervene, or in the alternative, limit CEP's intervention to the issue of a two-year extension to KCP&L's current DSM pilot programs.

Respectfully submitted,

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⁵ KCP&L has no objection to meeting with CEP to discuss DSM in Kansas. Such discussions are more appropriately held outside of the present docket, however.



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**ATTORNEYS FOR
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CERTIFICATE OF SERVICE

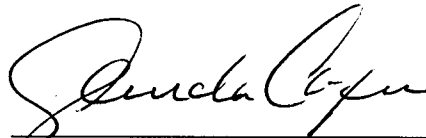
I, the undersigned, do hereby certify that on this 16th day of August, 2013, a true and correct copy of the above and foregoing document was electronically served, hand-delivered or mailed, postage prepaid, to the below-named individuals.

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