THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Before Commissioners: P

Pat Apple, Chairman Shari Feist Albrecht

Jay Scott Emler

In the Matter of the Application of Kansas City)	
**	,	
Power & Light Company for Approval of its)	
2017 Energy Efficiency Rider for Program)	Docket No. 17-KCPE-446-TAR
Costs Incurred January 1 Through December)	
31, 2016.)	

ORDER APPROVING 2017 ENERGY EFFICIENCY RIDER

This matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed the pleadings and record, the Commission makes the following findings:

- 1. On March 31, 2017, Kansas City Power & Light Company (KCP&L) filed an Application with the Commission for approval of its 2017 Energy Efficiency Rider for program costs incurred January 1 through December 31, 2016. In its Application, KCP&L requests to defer recovery of this year's Energy Efficiency Rider (EE Rider) amount until its next EE Rider filing.¹
- 2. KCP&L notes that it spent \$286,456 on DSM programs in 2016, and it also must true-up a \$16,018 under-recovery of its 2014 costs recovered over the period July 1, 2015, through June 30, 2016.² In addition, KCP&L was allowed to defer recovery of its 2015 DSM program costs in last year's filing.³ Rather than implementing a 2017 EE Rider for a total of

¹ Application of Kansas City Power & Light Company for Approval of Its 2017 Energy Efficiency Rider, March 31, 2017, ¶ 4. (Application, ¶ 4.)

² Application, ¶ 4.

³ Docket No. 16-KCPE-439-TAR, Order Approving KCP&L's 2015 Energy Efficiency Rider, May 19, 2015, ¶ 7. This included approved program costs of \$230,972 less \$35,809 in actual recovered 2014 DSM program costs recovered through normal proration billing.

\$481,619 of unrecovered DSM costs, KCP&L again requests that it be allowed to defer that amount for recovery in next year's EE Rider filing.⁴

3. On July 3, 2017, Commission Staff (Staff) filed a Report and Recommendation (R&R) analyzing KCP&L's Application. In its R&R, Staff recommends approval of KCP&L's request to defer recovery until next year's filing. In support, Staff states,

[A]ll other things being equal, it is in [ratepayers'] interest to delay a rate increase as long as there are not carrying costs or other costs to ratepayers associated with the delay. Additionally, KCPL is voluntarily requesting this delay so it cannot argue that its shareholders are being harmed. Therefore, this request is in the public interest.⁵

In its analysis, Staff confirms KCP&L has correctly accounted for the EE Rider costs and agrees that, should KCP&L be allowed to defer recovery, the EE factor would be set at \$0.00000/kWh for each customer class.⁶

4. In summary, Staff recommends the Commission approve KCP&L's Application and request to defer cost-recovery, subject to the following conditions:

KCPL shall file its next EER on or before March 31, 2018, to include costs incurred for Commission-approved programs from January 1, 2017, through December 31, 2017. In this filing, KCPL shall include a true-up calculation to true-up amounts collected from July 1, 2016, to June 30, 2017, versus the amounts intended to be collected for that time period.⁷

5. On July 10, 2017, the Citizens' Utility Ratepayer Board (CURB) filed its Response to Staff's R&R. In its Response, CURB states that it "has reviewed Staff's recommendation and believes it is in the best interests of Kansas residential customers." CURB

⁴ Application, ¶ 4.

⁵ Staff's Report & Recommendation, May 3, 2016, p. 3. (Staff R&R, p. 3)

⁶ Staff R&R, pp. 2-3.

⁷ Staff R&R, p. 3.

also notes support for Staff's recommendations and conclusions and specifically recommends "the Commission adopt Staffs Report and Recommendation." 8

II. Findings and Conclusions

6. Having reviewed KCP&L's Application, Staff's R&R, and CURB's Response, the Commission finds and concludes approval of KCP&L's Application and request to defer cost-recovery to its next EER filing is reasonable and is in the public interest. The Commission approves KCP&L's Application, subject to the condition recommended by Staff in paragraph 4 above.

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

- A. Kansas City Power and Light Company's Application for Approval of its 2017 Energy Efficiency Rider is approved, subject to Staff's recommended condition set forth in paragraph 4 above.
- B. Parties have 15 days, plus three days if service is by mail, from the date of service of this Order in which to petition the Commission for reconsideration.⁹
- C. The Commission retains jurisdiction over the subject matter and parties for the purpose of entering such further order, or orders, as it may deem necessary and proper.

BY THE COMMISSION IT IS SO ORDERED.

Apple, Chairman; Albrecht, Commissioner; Emler, Commissioner

Dated: JUL 2 5 2017

AF

ynn'M. Retz

Secretary to the Commission

L. M. Re

⁸ CURB's Response to Staff's R&R, May 6, 2015, ¶ 3.

⁹ K.S.A. 66-118b; K.S.A. 77-529(a)(1).

CERTIFICATE OF SERVICE

17-KCPE-446-TAR

I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of

Electronic Service on _______ JUL 2 5 2017

THOMAS J. CONNORS, ATTORNEY AT LAW CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3116 tj.connors@curb.kansas.gov

DAVID W. NICKEL, CONSUMER COUNSEL CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3116 d.nickel@curb.kansas.gov

SHONDA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Fax: 785-271-3116
sd.smith@curb.kansas.gov

LOIS LIECHTI, MGR REGULATORY AFFAIRS
KANSAS CITY POWER & LIGHT COMPANY
ONE KANSAS CITY PL, 1200 MAIN ST 19th FLOOR (64105)
PO BOX 418679
KANSAS CITY, MO 641419679
Fax: 816-556-2110
lois.liechti@kcpl.com

ROGER W. STEINER, CORPORATE COUNSEL KANSAS CITY POWER & LIGHT COMPANY ONE KANSAS CITY PL, 1200 MAIN ST 19th FLOOR (64105) PO BOX 418679 KANSAS CITY, MO 64141-9679 Fax: 816-556-2787 roger.steiner@kcpl.com TODD E. LOVE, ATTORNEY CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3116 t.love@curb.kansas.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Fax: 785-271-3116
d.smith@curb.kansas.gov

ROBERT J. HACK, LEAD REGULATORY COUNSEL KANSAS CITY POWER & LIGHT COMPANY ONE KANSAS CITY PL, 1200 MAIN ST 19th FLOOR (64105) PO BOX 418679 KANSAS CITY, MO 64141-9679 Fax: 816-556-2787 rob.hack@kcpl.com

LISA STARKEBAUM, SUPERVISOR, REGULATORY
AFFAIRS
KANSAS CITY POWER & LIGHT COMPANY
ONE KANSAS CITY PL, 1200 MAIN ST 19th FLOOR (64105)
PO BOX 418679
KANSAS CITY, MO 641419679
Fax: 816-556-2110
lisa.starkebaum@kcpl.com

NICOLE A. WEHRY, SENIOR PARALEGAL KANSAS CITY POWER & LIGHT COMPANY ONE KANSAS CITY PL, 1200 MAIN ST 19th FLOOR (64105) PO BOX 418679 KANSAS CITY, MO 641419679 Fax: 816-556-2787 nicole.wehry@kcpl.com

CERTIFICATE OF SERVICE

17-KCPE-446-TAR

ANTHONY WESTENKIRCHNER, SENIOR PARALEGAL KANSAS CITY POWER & LIGHT COMPANY ONE KANSAS CITY PL, 1200 MAIN ST 19th FLOOR (64105) PO BOX 418679 KANSAS CITY, MO 641419679 Fax: 816-556-2787 anthony.westenkirchner@kcpl.com

ANDREW FRENCH, SENIOR LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 Fax: 785-271-3314 a.french@kcc.ks.gov

JAKE FISHER, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 Fax: 785-271-3354 j.fisher@kcc.ks.gov

/S/ DeeAnn Shupe

DeeAnn Shupe

EMAILED

JUL 25 2017