

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

JUL 18 2013

by
State Corporation Commission
of Kansas

In the Matter of the Application of Kansas)
City Power & Light Company for Approval)
To Extend its Demand-Side Management)
Programs)

Docket No. 14-KCPE-042 -TAR

**JOINT MOTION OF KANSAS CITY POWER & LIGHT COMPANY,
COMMISSION STAFF, AND THE CITIZENS' UTILITY RATEPAYER BOARD
FOR STAY OF PROCEEDING AND INTERIM ORDER**

Kansas City Power & Light Company (“KCP&L” or the “Company”), the Staff of the State Corporation Commission of the State of Kansas (“Commission Staff”), and the Citizens’ Utility Ratepayer Board (“CURB”) (collectively, “Joint Movants”), hereby move the State Corporation Commission of the State of Kansas (“Commission”) for an order (1) staying further consideration of the Application filed in this docket until evaluation, measurement, and verification (“EM&V”) results become available, (2) allowing continuation of the Demand-Side Management (“DSM”) pilot programs that are the subject of this docket until further order of the Commission, and (3) approving an interim 2014 budget equal to the existing 2013 Commission-approved budget level to allow continuation of the subject DSM pilot programs until such time as the EM&V contemplated in Docket No. 08-GIMX-442-GIV (“442 Docket”)¹ and Docket No. 10-GIMX-013-GIV (“013 Docket”)² is completed and further order of the Commission. In support of this motion, Joint Movants state as follows.

¹ Docket No. 08-GIMX-442-GIV, “In the Matter of a General Investigation Regarding Benefit-Cost Analysis and Program Evaluation for Energy Efficiency Programs”, Order issued April 13, 2009, pp. 38-50.

² Docket No. 10-GIMX-013-GIV, “In the Matter of a General Investigation Regarding Development of an RFP for a Third-Party Provider or Providers of Energy Efficiency Program Evaluation, Measurement, & Verification”, Order issued Oct. 4, 2010.

I. BACKGROUND

1. In Docket No. 11-KCPE-780-TAR (“780 Docket”), the Commission approved continuation of KCP&L’s current portfolio of DSM pilot programs for two years.³ Those programs currently are set to expire on January 3, 2014.⁴ The Commission ordered that the programs remain as pilot programs.⁵ Additionally, the Commission ruled that KCP&L must file for termination, modification, or permanent status of these programs following completion of Docket No. 12-GIMX-337-GIV (“337 Docket”) and prior to the expiration of the programs.⁶ Concurrent with the filing of this Joint Motion, KCP&L is making the requisite application filing requesting a modification to extend for two years the end date for the pilot programs (“Application”).

2. In its Application, KCP&L is requesting Commission approval to continue its six active pilot DSM programs for two additional years or until December 31, 2015, with some minor modifications.⁷ These programs were originally implemented as pilot programs under the Settlement Agreement in Docket No. 04-KCPE-1025-GIE (“1025 Docket”).⁸ The six programs comprising KCP&L’s current DSM portfolio are as follows:

- Low Income Weatherization Approved December 9, 2005
- Home Energy Analyzer Approved March 7, 2006
- Business Energy Analyzer Approved December 22, 2006

³ See *Order Approving Application with Modification*, 780 Docket, filed January 4, 2012, Ordering ¶ A.

⁴ *Id.*, and currently approved KCP&L DSM tariffs, Schedules 6, 7, 8 and 76, effective January 4, 2012.

⁵ *Id.*

⁶ *Id.*, Ordering ¶ B.

⁷ KCP&L has three additional DSM pilot programs that are currently frozen to new activity. See Commission Orders issued June 22 and July 13, 2011 in Docket Nos. 11-KCPE-690-TAR (Energy Star® New Homes), 11-KCPE-694-TAR (Energy Audit and Energy Saving Measures), and 11-KCPE-695-TAR (Cool Homes).

⁸ See Joint Motion to Approve Stipulation and Agreement, Appendices B and B-1, filed April 27, 2005, in the 1025 Docket and *Order Approving Stipulation and Agreement*, issued August 5, 2005, also in the 1025 Docket.

- Building Operator Certification Approved May 15, 2007
- Energy Optimizer Approved January 10, 2006
- MPower Approved September 25, 2006

3. In the 013 Docket, the Commission set forth the procedures to be used for conducting EM&V.⁹ As part of the procedures set forth in the 013 Docket, the Commission found that utilities should be permitted to contract for EM&V services for their own purposes¹⁰, but that official EM&V processes “should be undertaken within the context of a docket opened for that purpose” and that “the provision of EM&V services should be between the Commission and the provider.”¹¹ The parties anticipate the above process will be utilized in the current proceeding. If the parties utilize this process, the EM&V for the above-listed programs is expected be conducted during the first six months of 2014 and completed approximately June 30, 2014.

II. MOTION TO EXTEND PROGRAMS AND BUDGETS UNTIL EM&V IS COMPLETED.

4. As stated above, KCP&L’s portfolio of programs will expire on January 3, 2014 unless the Commission has taken some action in this docket. Further, as explained above, the new EM&V results for these programs will not be available to the Commission until the summer of 2014. In light of these timing issues, Joint Movants are requesting the Commission stay further consideration of this Application until after the Commission-directed EM&V results are submitted. To accomplish this, Joint Movants are requesting the Commission issue an interim order as soon as possible that will approve the continuation of the programs beyond the January 3, 2014 end date, until further order of the Commission. This interim order will also necessarily

⁹ See, *Order Adopting Energy Efficiency Program EM&V RFP and Procedures*, issued Oct. 4, 2010.

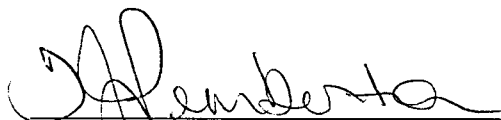
¹⁰ *Order Adopting Energy Efficiency Program EM&V RFP and Procedures*, ¶37, issued Oct. 4, 2010.

need to approve on an interim basis a continuation of the existing budget levels for these programs.

WHEREFORE, Joint Movants respectfully request the Commission issue an Order (1) staying further consideration of the Application filed in this docket until the EM&V results are available to the Commission, (2) allowing continuation of the subject DSM pilot programs until such further Order of the Commission, and (3) approving an interim 2014 budget at a level consistent with the 2013 approved budget level to allow continuation of the subject DSM pilot programs until such time as the Commission reaches a final decision on the Application.

Respectfully submitted,

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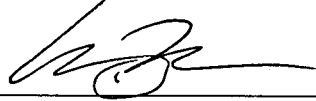


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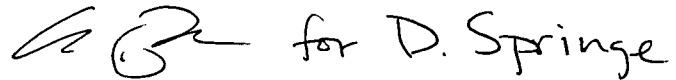
¹¹ *Order Adopting Energy Efficiency Program EM&V RFP and Procedures, ¶¶ 22 & 23, issued Oct. 4, 2010.*

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VERIFICATION

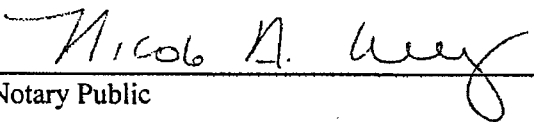
STATE OF MISSOURI)
)
COUNTY OF JACKSON)

I, Darrin R. Ives, being duly sworn, on oath state that I am Senior Director, Regulatory Affairs of Kansas City Power & Light Company, that I have read the foregoing Motion and know the contents thereof, and that the facts set forth therein are true and correct to the best of my knowledge and belief.

KANSAS CITY POWER & LIGHT COMPANY

By: 
Darrin R. Ives

The foregoing Motion was subscribed and sworn to before me this 18th day of July, 2013.


Notary Public

My Commission Expires:

Feb. 4 2015

