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Kansas Corporation Commission
/s/ Patrice Petersen-Klein
DEC 21 2011

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

by
State Corporation Commission
of Kansas

In the Matter of a General Investigation of)
Energy-Efficiency Policies for Utility) Docket No. 12-GIMX-337-GIV
Sponsored Energy-Efficiency Programs)

REPLY COMMENTS OF CITIZENS' UTILITY RATEPAYER BOARD

The Citizens' Utility Ratepayer Board ("CURB") submits its reply comments filed by various parties in the above captioned docket.

In addition to providing comments on Staff's proposed issues, parties provided additional issues that they believe require further Commission clarification. Black Hills Energy provided comments requesting Staff further clarify the proposed list of issues. Specifically, Black Hills Energy commented that Staff's issues regarding natural gas inclusion and decoupling are "very broad" and asked that "Staff provide additional clarification."¹ While CURB contends that the topic of decoupling was discussed fully in the Commission's order in the 441 Docket and does not require further clarification, if the Commission wants to address the issue of decoupling for natural gas utilities, it should require Staff to clarify and better define its proposed issue.


CURB also agrees with the foundational issues provided by the Climate and Energy Project ("CEP"). In its comments, CEP provided nine additional issues that it felt needed to be further clarified in during this general investigation. Specifically, CURB agrees that the Commission should investigate what the "new economic and operational realities" are surrounding the implementation of energy-efficiency and demand side management programs in Kansas. Further, CURB agrees with the foundational issues CEP provided such as "should the

¹ KCC Docket No. 12-GIMX-337-GIV, *Comments of Black Hills Energy Regarding Staff's Proposed Issues List*, at ¶6.

presence of excess electrical generating capacity exempt an electrical utility from adopting EE and DSM programs” and “should energy reduction targets be adopted.”²

Without a discussion and clarification of the goals and foundational issues regarding energy-efficiency programs in Kansas, this proceeding will focus solely on dollars – specifically how to give more of consumers’ dollars to the utilities faster. The Commission should focus its investigation on which energy-efficiency programs make the most economic sense for consumers in Kansas, and further investigate how to deliver these programs to all Kansans in the most cost-effective way. CURB recommends that in addition to the issues provided by Staff and other parties in this investigation, the Commission should re-evaluate the underlying premises and approaches to energy-efficiency that were adopted in the 441 and 442 Dockets.

Respectfully submitted,



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² KCC Docket No. 12-GIMX-337-GIV, *Response of Intervenor Climate and Energy Project to Staff’s Proposed Issues*, at ¶5C and ¶5G.

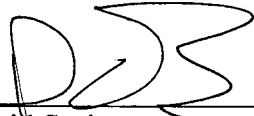
VERIFICATION

STATE OF KANSAS)

COUNTY OF SHAWNEE) ss:

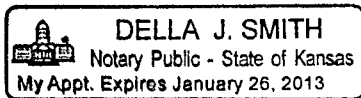
I, David Springe, of lawful age, being first duly sworn upon his oath states:

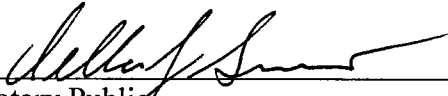
That he is an attorney for the Citizens' Utility Ratepayer Board, that he has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.



David Springe

SUBSCRIBED AND SWORN to before me this 21st day of December, 2011.





Notary Public

My Commission expires: 01-26-2013.

CERTIFICATE OF SERVICE

12-GIMX-337-GIV

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, electronic service or hand-delivered this 21st day of December, 2011, to the following:

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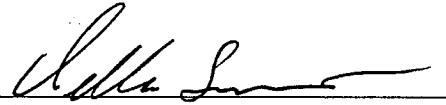
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