# BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

| In the Matter of the Application of Kansas | ) |                                     |
|--|---|-------------------------------------|
| City Power & Light Company for Approval    | ) | 404                                 |
| To Extend its Demand-Side Management       | ) | Docket No. 18-KCPE- <u>124</u> -TAR |
| Programs                                   | ) |                                     |

# JOINT MOTION OF KANSAS CITY POWER & LIGHT COMPANY, COMMISSION STAFF, AND THE CITIZENS' UTILITY RATEPAYER BOARD FOR 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) allowing continuation of five Demand-Side Management ("DSM") programs, and (2) approving the use of the previously approved unspent budget as an interim budget to allow continuation of the subject DSM pilot programs until further order of the Commission. In support of this motion, Joint Movants state as follows.

#### I. BACKGROUND

- 1. In Docket No. 16-KCPE-446-TAR ("446 Docket"), the Commission approved continuation of KCP&L's current portfolio of DSM pilot programs through September 30, 2017.<sup>1</sup> Concurrent with the filing of this Joint Motion, KCP&L is making the requisite application filing requesting a five-year extension of five of the pilot programs ("Application").
- 2. In its Application, KCP&L is requesting Commission approval to continue five (Low Income Weatherization, Home Energy Analyzer, Business Energy Analyzer, Building Operator Certification and Programmable Thermostat) of its six active pilot DSM programs for

five additional years, with one minor modification.<sup>2</sup> The Application also seeks to discontinue the Demand Response Incentive Rider program.

# II. MOTION TO EXTEND PROGRAMS AND BUDGETS UNTIL A COMMISSION ORDER ON THIS APPLICATION.

3. As stated above, KCP&L's portfolio of programs will expire on September 30, 2017. In light of these timing issues, Joint Movants are requesting the Commission issue an interim order as soon as possible that will approve the continuation of the five programs beyond the September 30, 2017 end date, until further order of the Commission. This interim order will also necessarily need to approve the use of KCP&L's unspent DSM budget to allow continuation of the five programs on an interim basis. The unspent budget is approximately \$450,000.

WHEREFORE, Joint Movants respectfully request the Commission issue an Order (1) allowing continuation of the subject DSM pilot programs until such further Order of the Commission, and (2) approving the use of the unspent DSM budget to allow continuation of the subject DSM pilot programs until such time as the Commission reaches a final decision on the Application.

<sup>&</sup>lt;sup>1</sup> Order Amending Procedural Schedule, December 15, 2016.

<sup>&</sup>lt;sup>2</sup> 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).

#### Respectfully submitted,

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# ATTORNEY FOR CITIZENS' UTILITY RATEPAYER BOARD

#### **VERIFICATION**

| STATE OF MISSOURI )  |  |
|--|--|
| COUNTY OF JACKSON )  |  |
| I, Tim M. Rush, being duly sworn, on oath sta<br>Kansas City Power & Light Company, that I have<br>contents thereof, and that the facts set forth there<br>knowledge and belief. | read the foregoing Motion and know the   |
| KANSA  | S CITY POWER & LIGHT COMPANY   |
| By:  | Cim M. Rush  |
| The foregoing Application was subscribed a September, 2017.  | and sworn to before me this 11th day of  |
| Notary (   | Public   |
| My Commission Expires:   | ANTHONY R WESTENKIRCHNER<br>Notary Public, Notary Seal<br>State of Missouri    |
| Nachan   | Platte County<br>Commission # 17279952<br>My Commission Expires April 26, 2021 |

4/26/2021