

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

State Corporation Commission
787 South K. Duffy
STATE CORPORATION COMMISSION

MAY 21 2009

In the Matter of the Application of Kansas)
City Power & Light Company for Approval)
Of a Low Income Weatherization Variance)
And For Approval of Related Modifications)
To Its Low Income Weatherization Tariff.)

Docket No. 09-KCPE-828 -TAR

Sumner Talbot Docket Room

AMENDMENT TO THE APPLICATION OF
KANSAS CITY POWER & LIGHT COMPANY

COMES NOW Kansas City Power & Light Company (“KCP&L”), and hereby amends its Application filed in this docket as follows:

1. On April 23, 2009, KCP&L filed an Application with the Kansas Corporation Commission (“Commission”) for approval of its Low Income Weatherization – Variance tariff (“Schedule LIWV”), and a related modification to KCP&L’s Low Income Weatherization tariff (“Schedule LIW”). Attached as **Exhibit D** to the Application was a redlined copy showing changes proposed to the LIW tariff. Attached as **Exhibit E** to the Application was a clean copy of the tariff sheet with the proposed changes incorporated.

2. This Application failed to contain two additional changes to KCP&L’s current Schedule LIW discussed at the April 17, 2009 meeting of the Kansas Advisory Group (the informal advisory group consisting of Commission Staff, the Citizen’s Utility Ratepayers Board and KCP&L for the development, implementation, monitoring and evaluation of KCP&L’s Demand Response, Efficiency and Affordability Programs.) These requested changes to Program Grants and Customer Eligibility are included in this amendment as follows:

(a) Program Grants

The section of the current tariff entitled “PROGRAM GRANTS” states that the total amount of grants offered to a Customer shall not exceed the Adjusted Average Expenditure Limit for weatherization determined by the U.S. Department of Energy that is applicable for the month the weatherization is completed. The intent with the original filing was for the average of the Program Grants not to exceed the Adjusted Average Expenditure Limit. KCP&L is modifying this language to state,

The average expenditure per Customer in each program year shall not exceed the Adjusted Average Expenditure Limit for weatherization determined by the U.S. Department of Energy that is applicable for the month that the weatherization is completed.

This modified language will reflect the original intent for the program and the manner in which the current program is being administered. The Adjusted Average Expenditure Limit for 2009 is \$3,055.

(b) Customer Eligibility

The section of the current tariff entitled “CUSTOMER ELIGIBILITY” now reads,

The Social Service Agency will select Customers eligible for Low Income Weatherization using the following criteria: The Customer’s household earnings at or below 185% of the current year Federal Poverty Level guidelines or below 60% of the state median income, whichever is higher for the number of persons in the residence...

With this Amendment to the Application, KCP&L is requesting to delete this language and replace it with the following:

The Social Service Agency will select Customers eligible for Low Income Weatherization using the following criteria: The Customer’s household earnings meet the low income guidelines for weatherization specified by the Department of Energy (DOE) for the number of persons in the residence...


The intent of this modification is to change the tariff so that changes in the Department of Energy (DOE) weatherization guidelines can be adopted without having to file to amend the

tariff for each change. The DOE Weatherization eligibility criterion increased from 150 percent of the Federal Poverty Level guideline to 200 percent of the Federal Poverty Level guideline through the American and Recovery Reinvestment Act of 2009 (ARRA). Adopting the DOE Weatherization eligibility in the tariff will simplify administration and also maintain transparency in the tariff.

3. KCP&L has amended **Exhibit D** and **Exhibit E** to the initial Application to reflect the above modifications. The **Amended Exhibit D** and **Amended Exhibit E** are attached hereto. Staff has indicated it has no objection to KCP&L filing this Amendment at this time.

WHEREFORE, KCP&L respectfully requests that the Commission approve KCP&L's Application as amended herein for the reasons set forth above and in the initial Application filed on April 23, 2009.

Respectfully submitted,



Glenda Cafer (Bar No. 13342)
Cafer Law Office
3321 SW 6th Avenue
Topeka, Kansas 66606
Telephone: (785) 271-9991
Fax: (785) 233-3040
E-mail: gcafer@sbcglobal.net

ATTORNEY FOR KCP&L

KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 6 Sheet 1

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed November 1, 2005 September 14, 2007

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet 1 of 2 Sheets

**LOW-INCOME WEATHERIZATION
Schedule LIW
(See also Schedule 6.1 LOW INCOME WEATHERIZATION – Variance)**

PURPOSE:

This Program is intended to assist residential Customers in reducing their energy usage by weatherizing the homes of qualified Customers a qualified Customer's home. The Company's participation in this Program is limited to funds set forth in Appendix B, described in the "Affordability" section referring to Low-Income Weatherization of the Stipulation and Agreement approved by the Kansas Corporation Commission (Commission) in Docket No. 04-KCPE-1025-GIE.

AVAILABILITY:

This Program is available to any Customer currently receiving service under any generally available residential rate schedule for a minimum of one year prior to completion of an application for weatherization assistance and who also meets the additional Customer eligibility requirements defined in the agreement between the Company and the Social Service Agency. The Company reserves the right to modify or terminate the Program at any time subject to Commission approval.

PROGRAM ADMINISTRATION:

The Program will be administered by Kansas-based Social Service Agencies that are directly involved in qualifying and assisting Customers under this Program.

PROGRAM ADMINISTRATION COSTS:

Program funds cannot be used for administrative costs except those incurred by the Social Service Agency that are directly related to qualifying and assisting Customers under this Program. The amount of reimbursable administrative costs per Program year shall not exceed 13% of the total Program funds, as defined in the agreement between the Company and the Social Service Agency, that are utilized by the Social Service Agency within a Program year .

PROGRAM GRANTS:

The total amount of grants offered to a Customer will be defined in the agreement between the Company and the Social Service Agency using established criteria for Low-Income Weatherization. The average expenditure per Customer in each program year ~~total amount of grants offered to a Customer~~ shall not exceed the Adjusted Average Expenditure Limit for weatherization determined by the U.S. Department of Energy that is applicable for the month that the weatherization is completed.

Issued:	<u>May 21, 2009</u> September 14, 2007
	Month Day Year
Effective:	_____
	Month Day Year
By:	<u>Chris Giles</u> <u>Vice President</u>
	Title

FILED
THE STATE CORPORATION COMMISSION OF KANSAS
By: _____



KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 6 Sheet 2

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed November 1, 2005 September 14, 2007

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet 2 of 2 Sheets

LOW-INCOME WEATHERIZATION

Schedule LIW

(Continued)

(See also Schedule 6.1 LOW INCOME WEATHERIZATION – Variance)

CUSTOMER ELIGIBILITY:

The Social Service Agency will select Customers eligible for Low-Income Weatherization using the following criteria: The Customer's household earnings meet the low income guidelines for weatherization specified by the Department of Energy (DOE) at or below 185% of the current year Federal Poverty Level guidelines or below 60% of the state median income, whichever is higher for the number of persons in the residence, for the number of persons in the residence, the residence must have energy consumption greater than 3,000 kWh per year, the Customer has received electric service from the Company for a minimum of one year prior to completion of an application, and other eligibility requirements defined in the agreement between the Company and Social Service Agency.

PROGRAM REPORTING:

The Company, with the assistance from all of the Social Service Agencies that administrate the Program, will submit a report on the Program to the Commission Staff on or before April 16, 2006 and on the same date for each succeeding year in which the Program continues. Each report will address the progress of the Program, and provide an accounting of the funds received and spent on the Program during the preceding calendar year. The report will include the following information with breakdowns for each of the participating Social Service Agencies:

- a: Program funds provided by Company;
- b: Amount of Program funds, if any, rolled over from previous year;
- c: Amount of administrative funds retained by the Social Service Agency;
- d: Number of weatherization jobs completed and total cost (excluding administrative funds) of jobs completed; and
- e: Number of weatherization jobs "in progress" at the end of the calendar year.

The report shall be subject to audit by Commission Staff.

PROGRAM FUNDING:

To the extent the funds set forth in Appendix B for the Low-Income Weatherization Program exceeds the total cost expended on the Program, the amount of excess shall be "rolled over" to be utilized for the weatherization Program in the succeeding year. After five years from the effective date of the Low-Income Weatherization Program, if there is excess funding the amount of excess shall be available for other Affordability programs.

Issued: <u>May 21, 2009</u> September 14, 2007 <small>Month Day Year</small>	FILED THE STATE CORPORATION COMMISSION OF KANSAS
Effective: _____ <small>Month Day Year</small>	
By: <u>Chris Giles</u> <u>Vice President</u> <small>Title</small>	

KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 6 Sheet 1

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed September 14, 2007

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet 1 of 2 Sheets

**LOW INCOME WEATHERIZATION
Schedule LIW
(See also Schedule 6.1 LOW INCOME WEATHERIZATION - Variance)**

PURPOSE:

This Program is intended to assist residential Customers in reducing their energy usage by weatherizing the homes of qualified Customers. The Company's participation in this Program is limited to funds set forth in Appendix B, described in the "Affordability" section referring to Low Income Weatherization of the Stipulation and Agreement approved by the Kansas Corporation Commission (Commission) in Docket No. 04-KCPE-1025-GIE.

AVAILABILITY:

This Program is available to any Customer currently receiving service under any generally available residential rate schedule for a minimum of one year prior to completion of an application for weatherization assistance and who also meets the additional Customer eligibility requirements defined in the agreement between the Company and the Social Service Agency. The Company reserves the right to modify or terminate the Program at any time subject to Commission approval.

PROGRAM ADMINISTRATION:

The Program will be administered by Kansas-based Social Service Agencies that are directly involved in qualifying and assisting Customers under this Program.

PROGRAM ADMINISTRATION COSTS:

Program funds cannot be used for administrative costs except those incurred by the Social Service Agency that are directly related to qualifying and assisting Customers under this Program. The amount of reimbursable administrative costs per Program year shall not exceed 13% of the total Program funds, as defined in the agreement between the Company and the Social Service Agency, that are utilized by the Social Service Agency within a Program year .

PROGRAM GRANTS:

The total amount of grants offered to a Customer will be defined in the agreement between the Company and the Social Service Agency using established criteria for Low Income Weatherization. The average expenditure per Customer in each program year shall not exceed the Adjusted Average Expenditure Limit for weatherization determined by the U.S. Department of Energy that is applicable for the month that the weatherization is completed.

Issued:	<u>May 21, 2009</u>
	Month Day Year
Effective:	<u><i>Chris Giles</i></u>
	Month Day Year
By:	<u>Chris Giles</u> Vice President
	Title

FILED

THE STATE CORPORATION COMMISSION OF KANSAS

By: _____



KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 6 Sheet 2

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed September 14, 2007

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet 2 of 2 Sheets

**LOW INCOME WEATHERIZATION
Schedule LIW**

(Continued)

(See also Schedule 6.1 LOW INCOME WEATHERIZATION – Variance)

CUSTOMER ELIGIBILITY:

The Social Service Agency will select Customers eligible for Low Income Weatherization using the following criteria: The Customer's household earnings meet the low income guidelines for weatherization specified by the Department of Energy (DOE) for the number of persons in the residence, the residence must have energy consumption greater than 3,000 kWh per year, the Customer has received electric service from the Company for a minimum of one year prior to completion of an application, and other eligibility requirements defined in the agreement between the Company and Social Service Agency.

PROGRAM REPORTING:

The Company, with the assistance from all of the Social Service Agencies that administrate the Program, will submit a report on the Program to the Commission Staff on or before April 16, 2006 and on the same date for each succeeding year in which the Program continues. Each report will address the progress of the Program, and provide an accounting of the funds received and spent on the Program during the preceding calendar year. The report will include the following information with breakdowns for each of the participating Social Service Agencies:

- a: Program funds provided by Company;
- b: Amount of Program funds, if any, rolled over from previous year;
- c: Amount of administrative funds retained by the Social Service Agency;
- d: Number of weatherization jobs completed and total cost (excluding administrative funds) of jobs completed; and
- e: Number of weatherization jobs "in progress" at the end of the calendar year.

The report shall be subject to audit by Commission Staff.

PROGRAM FUNDING:

To the extent the funds set forth in Appendix B for the Low Income Weatherization Program exceeds the total cost expended on the Program, the amount of excess shall be "rolled over" to be utilized for the weatherization Program in the succeeding year. After five years from the effective date of the Low Income Weatherization Program, if there is excess funding the amount of excess shall be available for other Affordability programs.

Issued: May 21, 2009
Month Day Year

Effective: Chris Giles
Month Day Year

By: Chris Giles Vice President
Title

FILED

**THE STATE CORPORATION COMMISSION OF
KANSAS**

By: _____
Secretary

VERIFICATION

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

The undersigned, Mary Britt Turner, upon oath first duly sworn, states that she is the Director, Regulatory Affairs of Kansas City Power & Light Company, that she has reviewed the foregoing Application Amendment, that she is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of her knowledge and belief.

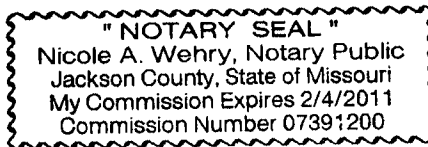
Mary Britt Turner
Mary Britt Turner
Director, Regulatory Affairs
Kansas City Power & Light Company

Subscribed and sworn to before me this 21st day of May, 2009.

Nicole A. Wehry
Notary public

My commission expires:

February 4, 2011




CERTIFICATE OF SERVICE

I hereby certify that a copy of the above the Amended Application of KCP&L was hand-delivered or mailed, postage prepaid, on this 21st day of May, 2009 to:

VICTORIA SCHATZ
MARY TURNER
MARSHA TROY
KANSAS CITY POWER & LIGHT
1201 WALNUT (64106)
KANSAS CITY, MO 64141-9679

MELISSA HUNSICKER WALBURN
ASST. GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KANSAS 66604

DAVID SPRINGE
NIKI CHRISTOPHER
C.STEVEN RARRICK
CURB
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604



GLENDA CAFER
COUNSEL FOR KCP&L