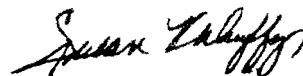


**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

STATE CORPORATION COMMISSION

JUN 11 2010



In the Matter of the Application of Kansas)
City Power & Light Company for Approval)
To Implement a Portfolio of Demand Side)
Management Programs Including)
Affordability, Energy Efficiency, Demand)
Response and Educational Programs, and to)
Implement a Rider for Recovery of Program)
Costs and Incentives Associated with this)
Portfolio)

Docket No. 10-KCPE- 795 -TAR

**APPLICATION OF
KANSAS CITY POWER & LIGHT COMPANY
FOR APPROVAL TO IMPLEMENT A PORTFOLIO OF DEMAND SIDE
MANAGEMENT PROGRAMS INCLUDING
AFFORDABILITY, ENERGY EFFICIENCY, DEMAND RESPONSE AND
EDUCATIONAL PROGRAMS, AND TO IMPLEMENT A RIDER FOR RECOVERY OF
PROGRAM COSTS AND INCENTIVES ASSOCIATED WITH THIS PORTFOLIO**

COMES NOW Kansas City Power & Light Company (“KCP&L”), and hereby requests from the Kansas Corporation Commission (“Commission”) approval of its Portfolio of Demand Side Management (“DSM”) programs, including Affordability, Energy Efficiency, Demand Response and Educational programs, proposed in this Application, and a new DSM Rider to be applicable to all of KCP&L’s DSM programs proposed in this Application, and all future DSM programs as may be proposed by KCP&L and approved by the Commission. KCP&L requests approval for the portfolio of DSM programs included with this Application in compliance with certain requirements of Docket No. 08-GIMX-441-GIE. In furtherance of this Application, KCP&L states as follows:

I. BACKGROUND

1. KCP&L is a vertically integrated electric public utility company under the jurisdiction of the Commission that is engaged in the generation, transmission, distribution and sale of electric energy to the public within the meaning of K.S.A. 66-104, in legally designated areas of Kansas. KCP&L holds a Certificate of Convenience and Authority issued by this Commission, authorizing KCP&L to engage in such utility business. KCP&L has previously filed with the Commission certified copies of its Articles of Incorporation under which it was organized, and its Certificate of Registration as a Foreign Corporation authorized to do business in Kansas, and all amendments thereto and restatements thereof, and the same are incorporated herein by reference.

2. In the Stipulation and Agreement covering KCP&L's Comprehensive Energy Plan approved by the Commission in Docket No. 04-KCPE-1025-GIE ("1025 S&A"), KCP&L committed to implement a series of Demand Response, Energy Efficiency and Affordability programs subject to Commission review and approval. [1025 S&A, Appendix C, page 6.] The 1025 S&A also provided that KCP&L would accumulate costs for these programs in regulatory asset accounts as the costs are incurred through the next rate case, at which time the amortization of these costs, and the return thereon, would be determined. [1025 S&A, page 4.]

3. In KCP&L's 2006 rate case, Docket No. 06-KCPE-828-RTS ("828 Docket"), KCP&L requested that its costs for developing and implementing DSM programs be amortized and included in its rate base for recovery in retail rates. The Stipulation and Agreement in the 828 Docket included an overall settlement, remaining silent on the treatment of these costs. The

Energy Efficiency Investigative Docket, Docket No. 07-GIMX-247-GIE¹ (“247 Docket”) was ongoing at the time of settlement.

4. In KCP&L’s 2007 rate case in Docket No. 07-KCPE-905-RTS (“905 Docket”), KCP&L again requested that its costs for developing and implementing DSM programs be amortized and included in its rate base for recovery in its retail rates. In the Stipulation and Agreement reached in the 905 Docket (“905 S&A”), the parties agreed that, until such time as the Commission adopts rules related to DSM program cost recovery, or the Kansas Legislature implements a new statute(s) addressing treatment of these costs, that, as an interim mechanism for recovery, KCP&L would recover these program costs through an EE Rider, such Rider to be proposed by KCP&L in line with the parameters and timing identified in the 905 S&A. The 905 S&A further stated that, in the event of either Commission adoption of such rules or implementation of a new statute as noted above, “KCP&L shall have the right to file for Commission approval of compliant recovery methodology to replace or revise the EE Rider.”

5. On February 29, 2008, in Docket No. 08-KCPE-802-TAR (“802 Docket”), KCP&L filed an application for approval of its first EE Rider to recover costs associated with Commission-approved DSM programs incurred during the time period July 1, 2006 through December 31, 2007. By Order issued June 13, 2008, the Commission approved KCP&L’s Application. KCP&L’s EE Rider became effective for the time period covering July 1, 2008 through June 30, 2009.

6. On March 31, 2009, in Docket No. 09-KCPE-770-TAR (“770 Docket”), KCP&L filed an application for approval of its 2009 EE Rider to recover costs incurred from January 1,

¹ The Commission later closed Docket No. 07-GIMX-247-GIE, and opened Dockets No. 08-GIMX-441-GIV and 08-GIMX-442-GIV for purposes of continuing to investigate the same energy efficiency issues. The Commission recognized the substitution of these new dockets for the earlier one in its Order approving the 905 S&A. [Footnote 1, page 8.]

2008 through December 31, 2008. By Order issued June 22, 2009, the Commission approved KCP&L's application. KCP&L's 2009 EE Rider became effective for the time period covering July 1, 2009 through June 30, 2010.

7. On March 31, 2010, in Docket No. 10-KCPE-636-TAR ("636 Docket"), KCP&L filed an application for approval of its 2010 EE Rider to recover program costs incurred from January 1, 2009 through December 31, 2009. KCP&L has requested that an order be issued in this docket by June 21, 2010. If the Commission approves KCP&L's application, KCP&L's 2010 EE Rider will become effective for the time period covering July 1, 2010 through June 30, 2011.

8. As anticipated in the 247 Docket, the Commission opened two generic dockets to investigate DSM programs and related issues. Docket No. 08-GIMX-441-GIV ("441 Docket") addressed Cost Recovery and Incentives for DSM programs, and Docket No. 08-GIMX-442-GIV ("442 Docket") addressed Benefit-Cost Analysis and Program Evaluation. Additionally, in July 2009, the Commission opened a generic docket, Docket No. 10-GIMX-013-GIV ("013 Docket") to develop a Request for Proposal ("RFP") for third party evaluation, measurement and verification of DSM programs. The 013 Docket is still pending.

9. On November 14, 2008, in the 441 Docket, the Commission issued an Order regarding cost recovery and incentives for DSM programs ("441 Order"). The 441 Order set the Commission's preference for a rider recovery mechanism as the best approach to cost recovery, at least as an initial choice while the Commission gains experience with energy efficiency programs. [441 Order, Paragraph 29, p. 10 and Paragraph A, p. 37.] The Commission policy also recognizes the throughput incentive issue that utilities face, and allows for consideration of shared saving performance incentive plans [441 Order, Paragraph D, p. 38.]

10. As KCP&L indicated in each of its EE Rider applications, the 802 Docket, the 770 Docket, and the recent 636 Docket, KCP&L has continued to evaluate the respective merits of various rider recovery mechanisms, including potential decoupling, lost revenue recovery, and shared savings incentives. By this Application, KCP&L is proposing for approval by the Commission a revised mechanism, the DSM Rider, intended to replace the current EE Rider under which KCP&L presently recovers its DSM program costs beginning with costs incurred during calendar year 2011. Costs for calendar year 2009 and for calendar year 2010 would continue to be recovered under the current EE Rider mechanism.

11. Additionally, in accordance with the 1025 S&A, KCP&L has previously received approval for and has implemented a portfolio of DSM pilot programs; one in 2005, four in 2006, six in 2007, and one in 2008. KCP&L withdrew one other program filed in 2005 and the Commission denied another program in 2008. The following is a list of those programs and their approval dates.

Affordability Programs

Affordable New Homes	July 23, 2007
Low Income Weatherization	December 9, 2005

Energy Efficiency Programs – Residential

Change a Light, Change the World	Withdrawn
Home Energy Analyzer	March 7, 2006
Cool Homes	July 12, 2007
Home Performance w/ENERGY STAR [®]	Denied
ENERGY STAR [®] New Homes	November 14, 2008

Energy Efficiency Programs – Commercial & Industrial (“C&I”)

Business Energy Analyzer	December 22, 2006
C&I Audit Rebate ²	January 17, 2007
C&I Custom Rebate – Retrofit ³	January 17, 2007
C&I Custom Rebate – New Construction ⁴	January 17, 2007
Building Operator Certification	May 15, 2007

Demand Response Programs

Energy Optimizer	January 10, 2006
MPower	September 25, 2006

12. These programs were implemented as pilot programs under a five-year budget defined in the 1025 S&A. [1025 S&A, Appendix B and B-1.] The programs require approval for permanent tariff status to continue beyond the expiration of the 1025 S&A. KCP&L has conducted evaluation, measurement and verification (“EM&V”) on seven of these programs to date and has reviewed the performance of each of these programs along with the goals for future demand side management investment. KCP&L has determined that some of the DSM programs should be continued as permanent programs, some with modifications, one should be discontinued, and an additional program related to Efficiency Kansas should be added to the portfolio; provided that the cost recovery and performance incentive mechanisms proposed herein are also approved by the Commission.

13. Since early 2009, KCP&L and other Kansas utilities have been working with the State Energy Office (“SEO”) and the KCC Staff on the Efficiency Kansas initiative which ties to the American Recovery and Reinvestment Act (“ARRA”) funds. The resulting KCP&L program

² Program is included in Energy Audit and Energy Savings Measures Rider.

³ Ibid.

that has been created through these efforts is the Energy Saver Loan Program. This program will enable KCP&L to partner with Efficiency Kansas to facilitate energy audits and administer loans for energy efficiency improvements to qualifying customers. KCP&L is including the Energy Saver Loan Program tariff as a new program in its portfolio for approval.

II. PORTFOLIO OF DSM PROGRAMS FOR APPROVAL

14. KCP&L, by this Application, is requesting Commission approval of its portfolio of DSM programs as submitted herewith. The portfolio consists of the following programs:

Affordability Programs

Low Income Weatherization

Energy Efficiency Programs – Residential

Cool Homes

ENERGY STAR® New Homes

Home Energy Analyzer

Energy Saver Loan Program

Energy Efficiency Programs – Commercial & Industrial (“C&I”)

Building Operator Certification

C&I Rebate Program⁵

Prescriptive Energy Efficiency Measures

Custom Energy Efficiency Measures

Request for Proposals

⁴ Ibid.

⁵ Previously known as the Energy Audit and Energy Saving Measures Rider that included C&I Audit Rebate, Custom Rebate – Retrofit, and Custom Rebate – New Construction.

Energy Saver Loan Program⁶

Business Energy Analyzer

Demand Response Programs

Energy Optimizer (Residential and C&I)

MPower (C&I)

Research Programs

Consumer Market Research Program

15. Of the above proposed programs, the Home Energy Analyzer, Business Energy Analyzer, and Building Operator Certification are classified by KCP&L as Educational Programs, consistent with the guidelines set out by the Commission in its Order in the 441 Docket.

16. Included with this Application is the testimony of Mr. Allen Dennis, Director, Products & Services for KCP&L, which provides detailed descriptions of each of these programs and how each promotes the Commission's goals set forth in the 442 Order, to wit:

- Energy efficiency programs need to produce cost-effective, firm energy savings. Energy efficiency programs should be used to achieve both energy and demand reductions.
- While recognizing that addressing societal inequities is not its primary mandate, the Commission seeks development of energy efficiency programs for all classes of customers, including low income customers where appropriate.
- Energy efficiency programs should target customers residing in structures most in need of efficiency improvements.

⁶ The Energy Saver Loan Program covers both residential and C&I customers under a single program.

- Programs should address efficiency improvements in a comprehensive manner using sound building science principles.
- Programs should implement the most cost-effective measures in a logical sequence to maximize the energy savings per dollar spent.
- Education programs should be implemented to facilitate achieving the maximum benefit from energy efficiency programs. Programs should be implemented that educate consumers about the actual cost of providing energy to their homes and businesses and encourage use of energy in the most reasonably efficient manner.
- Energy efficiency programs should have the potential to mitigate CO₂ emissions which is a desirable outcome but must be pursued in the context of assuring efficient and cost-effective utility programming.
- Energy efficiency programs should be used as a resource to moderate bill increases that are likely to be caused as utilities build new generation, implement environmental requirements and invest in additional transmission assets.
- Programs should explore the use of the monthly bill to provide information to consumers to increase their ability to make informed decisions.
- Portfolios should include dynamic pricing programs and other rate designs such as time-of-use, critical peak and seasonal price differentials that send more accurate price signals to customers. Dynamic pricing is a critical component of energy efficiency programming because of its potential to reduce peak energy demand and, thereby, postpone or avoid the need to build or acquire additional peaking generation capacity.

III. THE COST RECOVERY AND PERFORMANCE INCENTIVE MECHANISMS

17. KCP&L is proposing a new rider, its DSM Rider which incorporates cost recovery for its costs to develop, implement and evaluate its portfolio of DSM programs, a shared net benefits incentive mechanism, and a true-up mechanism as part of this Application.

18. The cost recovery portion of the new DSM Rider will differ from the current rider in that it will be forward-looking with concurrent recovery rather than being based on historical costs with an 18-month lag in recovery, as is presently the case. Similar to KCP&L's Energy Cost Adjustment ("ECA") Rider, the costs associated with the DSM portfolio will be forecast each December for the coming calendar year. The projected costs will be updated mid-year. This will provide the "nearly contemporaneous recovery of program costs" noted in the Commission's Final Order in the 441 Docket while mitigating the potential for over- or under-recovery of costs.

19. As KCP&L is proposing to move to a concurrent recovery method beginning with recovery of 2011 costs, and continuation of the current cost recovery methodology for 2009 and 2010 costs, there will be a transitional period of 18 months where two Riders will both be in place.⁷ KCP&L has provided an alternative to this situation wherein the recovery of the remaining 2009 costs as of the effective date of the new DSM Rider and the 2010 costs would be amortized over three years for recovery as part of the newly proposed DSM Rider. This alternative would not only limit confusion on the part of customers by having only a single DSM recovery factor on the bill, but would also extend the period over which KCP&L would recover

⁷ Presuming KCP&L's proposed DSM Rider goes into effect on February 1, 2011, as requested, five months of cost recovery would be outstanding under KCP&L's EE Rider for 2009 cost recovery which is presently pending approval and 12 months would be outstanding under the Company's EE Rider for 2010 cost recovery which is set to be filed in March 2011.

those costs for an additional 18 months. This alternative is explained in more detail later in this Application as well as in the Direct Testimony of company witness Curtis Blanc.

20. KCP&L is also proposing the integration of a performance incentive framework. The performance incentive portion of the new DSM Rider will be based upon shared net benefits with a sliding sharing percentage tied to the performance of the DSM portfolio in terms of actual energy savings achieved compared to the target savings estimated for the program.

21. Additionally, the new DSM Rider will have an annual true-up mechanism similar to that included in KCP&L's ECA Rider.

22. KCP&L witness Chris Giles provides an in-depth description of the proposed new DSM Rider in his Direct Testimony. The Direct Testimony of Curtis Blanc, Sr. Director, Regulatory Affairs, presents an overview of the filing, discusses the historical regulatory framework and events leading up to this filing, and addresses other regulatory administrative issues that affect this filing. His testimony also includes and supports all tariffs. The Direct Testimony of KCP&L witness Kevin Bryant, Vice President, Energy Solutions, provides the policy basis for filing the programs as a portfolio, gives an overview of KCP&L's DSM efforts to date and its plans to modify its portfolio, provides a brief foundation for the proposed DSM Rider, the Benefit/Cost analyses and KCP&L's Evaluation, Measurement & Verification ("EM&V") process. The Direct Testimony of Allen Dennis discusses KCP&L's existing programs and the results of those programs, identifies proposed changes and additions to the portfolio, and explains how KCP&L's portfolio meets the Commission's goals set forth in its 442 Order. KCP&L witness Joe O'Donnell provides testimony regarding the benefit/cost tests for each of the proposed portfolio programs.

IV. DISCUSSION

23. In the 441 Order, the Commission restated its view that energy efficiency is a resource to be considered in a balanced approach between traditional and alternative energy sources, that the Commission favors programs that address energy efficiency in a comprehensive way, such as focusing on total home or building efficiency, especially programs that target low-income customers, fixed income customers, renters, and customers who reside in residences most in need of energy efficiency upgrades. [441 Order, paragraph 5.] In accordance with this Commission directive, KCP&L is presently offering a portfolio of twelve pilot DSM programs to its customers, is proposing modifications to several of these programs based upon its experience over the past four and a half years, and is proposing an additional DSM program to continue to round out its portfolio. KCP&L continues to pursue the development of additional cost-effective DSM programs for future consideration by the Commission. The overall portfolio is designed to address DSM on a comprehensive basis.

24. KCP&L is seeking approval of these DSM programs on a permanent basis in conjunction with its cost recovery and performance incentive applications because KCP&L has determined that it is necessary - from a Company perspective - to receive approval of the above-described cost recovery and performance incentive mechanisms as a precondition to continuing implementation of its overall portfolio. KCP&L has spent nearly \$21 million in Kansas on development and implementation of DSM programs from 2005 through March 31, 2010. KCP&L has taken a leadership role on the DSM initiative in Kansas. KCP&L contemplates continuing to spend a significant amount of resources in pursuing the goals of demand side management, but that decision rests, in part, upon the Company's ability to recover its costs, including the potential that its investment of shareholder capital in this area could have some

positive impact on the Company's earnings. In other words, KCP&L plans to aggressively promote energy efficiency and demand response if the right cost recovery and incentive programs are in place. Limiting cost recovery to the current EE Rider methodology is not a sustainable alternative for the Company.

25. In the 441 Docket, KCP&L recommended the Commission treat DSM costs similar to its treatment of supply side resources, however, the Commission chose not to grant rate base treatment to DSM investments. In rejecting the concept of capitalization, the Commission reasoned that because a rider "offers nearly contemporaneous recovery of program costs for utilities, the need for carrying costs, creation of regulatory assets, and a return on such deferred accounts is reduced." [441 Order, paragraph 31.] Although KCP&L has been at the forefront of energy efficiency and demand response efforts in Kansas – and KCP&L continues to believe it is important for corporations to include in their decision-making process consideration of what is good for their communities – KCP&L notes that its current EE Rider results in an approximate 18-month lag between expenditure and cost recovery, without interest, and provides no financial incentive for KCP&L to continue to pursue demand side management. In fact, the Company would be better off financially, at least on a short term basis, to not offer demand side management programs or at least offer them to a lesser extent. With the portfolio recommended in this Application, KCP&L expects continued growth in customer participation in the Company's demand side management programs and, accordingly, continued loss of revenue. Without Commission approval of a more appropriate cost recovery mechanism including an incentive, KCP&L cannot continue its pursuit of DSM and still meet management's fiduciary obligation to its shareholders. Earnings come from receiving a return on the investments made by KCP&L with the capital provided by shareholders; it does not come from receiving dollar-

for-dollar reimbursement of expenses, no matter how quickly that reimbursement occurs after the expenditure is made.

26. Although the Commission rejected capitalization of DSM costs in rate base, the Commission has previously recognized that utility companies lack a compelling incentive to invest in DSM programs, as compared to new generation facilities, when they are allowed to only recover their dollar-for-dollar costs of the DSM programs without some “return on” their investment, as they would receive on an investment in new generation. The Commission has cited with approval the recommendation of the U.S. Department of Energy that “regulators should implement programs through a combination of infrastructure planning that includes programs as part of utility resource planning and rate cases, *ensuring utilities receive appropriate compensation for programs...*” and “align the incentives of utilities with cost-effective energy efficiency by removing regulatory and management disincentive to energy efficiency and providing incentives for the successful management of energy efficiency programs.” [November 6, 2007 Order Initiating Investigation in the 441 Docket, paragraphs 6-7.] (Emphasis added.) As the Commission stated in its 441 Order, cited above, the rider mechanism adopted in the 441 docket did not eradicate the need for carrying costs, creation of regulatory assets, or a return on the costs incurred; it only “reduced” the need.

27. In addition to the negative impact on earnings caused by the historical cost recovery rider, another obvious obstacle in the way of a utility company promoting energy efficiency is the fact that the utility company’s financial rewards are greater as customer usage increases since revenues are tied to sales volumes. As such, the company has a financial disincentive to implement programs designed to reduce consumption. This disincentive can be overcome by granting the utility the opportunity to share in the financial benefits realized using a

net benefits sharing incentive mechanism that balances the interests of the shareholders with those of the customers as part of the overall DSM plan.

28. KCP&L has avoided proposing a lost revenue or margin recovery mechanism since the Commission has indicated that methodology for addressing the problem is not favored. However, lost revenues due to successful DSM programs are a financial reality for the Company that cost the Company real dollars. Although a request for lost revenue would be more straightforward and simpler to administer in some respects, KCP&L has attempted to tailor its request to the guidance offered by the Commission. KCP&L's incentive proposal is a workable solution that protects customers from paying costs in excess of benefits received, provides the Company the opportunity to recoup some of its lost revenues, allows both customers and shareholders to enjoy the benefits of successful DSM programs, and does not, as a whole, harm low-income and fixed-income customers or disproportionately negatively affect such customers.

A. THE PERFORMANCE INCENTIVE MECHANISM

29. It is readily acknowledged by all interests involved in developing and promoting energy efficiency programs, that there is a conflict between a utility company's duty to maximize profits for shareholders and its desire to offer energy efficiency programs to its customers. The utility loses the ability to earn a "return on" its investment in future generation facilities that do not have to be built as a result of successful energy efficiency programs. This disincentive can be overcome by allowing capitalization of DSM program costs similar to treatment of investment in facilities. The Commission rejected the concept of capitalization in its 441 Order, but recognized that utilities must attract shareholders and capital investment, and that it has a duty in this regard. [441 Order, paragraph 95.] The Commission indicated a willingness to consider

performance incentives as an alternative to overcoming the disincentive described above, stating that such incentives,

- a) must be limited to specific energy efficiency programs the Commission has determined are the most beneficial for Kansas customers and the long-term energy efficiency goals of the Commission [441 Order, paragraph 96];
- b) should target low and fixed-income customers, and renters [441 Order, paragraph 97];
- c) should target new and existing residential housing and demonstrate a potential for long-term energy savings utilizing a comprehensive whole house concept [441 Order, paragraph 97];
- d) should have the effect of increasing the utility's investment in the energy efficiency program [441 Order, paragraph 110];
- f) should be compatible with the interest of utility ratepayers and other interested parties [441 Order, paragraph 110]; and
- g) should tie the incentive to the utility's performance in achieving Commission-set goals [441 Order, paragraph 110].

30. KCP&L has proposed a performance incentive as part of its new DSM Rider generally consistent with the Commission's directives. The significant difference is that KCP&L is asking for a performance incentive for its demand response programs as well as for its energy efficiency programs albeit on a reduced basis. The performance incentive incorporated into KCP&L's new DSM Rider is in the form of a shared net benefits approach; the approach the Commission has indicated it favors. KCP&L's incentive mechanism includes avoided energy and capacity costs, as well as transmission and distribution savings. [441 Order, paragraphs 99

and 104.] KCP&L's proposed performance incentive is consistent with the above guidelines adopted by the Commission, with the noted exception regarding demand response programs, as explained in detail in the Direct Testimony of Company witness Chris Giles.

B. TRANSITION OF COST RECOVERY RIDERS

31. KCP&L is requesting to change from a rider that recovers DSM program costs roughly 18 months after they are incurred, to a forward-looking rider that will recover DSM program costs essentially concurrent with expenditures. At present, KCP&L's EE Rider is recovering program costs incurred by KCP&L from January 1, 2008 through December 31, 2008. On July 1, 2010 (through June 30, 2011), assuming Commission approval of KCP&L's 636 Docket application, KCP&L will begin recovering its historical program costs incurred during 2009 and, if this methodology continues, from July 1, 2011 through June 30, 2012, KCP&L will recover its historical program costs incurred during 2010. If KCP&L's rider were to change to a prospective cost recovery basis on January 1, 2011, i.e., KCP&L begins to recover its 2011 projected DSM program costs on a concurrent basis, KCP&L would have only recovered approximately half of its 2009 program costs at that time and none of its 2010 program costs. Therefore, the unrecovered costs falling into this "gap" will need to be recovered either by continuing with the current EE Rider until all 2009 and 2010 costs are recovered while at the same time implementing the prospective rider for 2011 costs, or alternatively, these remaining unrecovered costs could be amortized over three years and recovered as an element within the new DSM Rider. KCP&L's Application provides for the continuation of the current EE Rider until all 2009 and 2010 DSM program costs are recovered; however, KCP&L offers the alternative of including these "Transition" costs amortized over three years in its new rider and eliminating the current EE Rider effective with the implementation of the proposed DSM Rider.

Once these Transition costs have been fully recovered, the Transition cost amortization would disappear from the DSM Rider calculation.

C. THE TRUE-UP PROCESS

32. The proposed true-up process for the new DSM Rider is designed to true-up both program costs and shared net benefits, and includes two components: one occurs every year and one occurs only after the EM&V process has been completed and approved for a program. The first is similar to that used for the Company's ECA Rider. By April 1 each year, the Company would file a comparison of its actual program costs for the previous year to the amount recovered for program costs during that year. It would also include a comparison of shared net benefits based upon actual program participation for the previous year to the amount recovered for shared net benefits during that year. A true-up factor would be included in the DSM Rider beginning July 1 of that year subject to an audit by Staff to account for any over- or under-recovery. The second true-up component occurs following completion and Commission approval of EM&V results for a program. Following such approval, KCP&L would file a comparison of shared net benefits for the period encompassed by the EM&V review based upon actual program participation and savings determined by the approved EM&V results. The true-up factor included in the DSM Rider would be adjusted to account for any over- or under-recovery of shared net benefits. The two components of the true-up mechanism must be handled on separate schedules because of the multi-year lag in completion and review of the EM&V study which is assumed to be conducted after two full years of a program being in place with completion and approval assumed to be completed no earlier than the end of the third year following program implementation.

V. TARIFF AND CONTACT INFORMATION

33. **Proposed Tariffs.** Attached to the testimony of KCP&L witness Curtis Blanc is the proposed tariff for KCP&L's revised DSM Rider. The allocation of costs proposed in the tariff is consistent with the allocation proposed by the Company in its current Docket No. 10-KCPE-636-TAR. Also attached to Mr. Blanc's testimony are the proposed program tariffs. Appendix A information, including benefit/cost analysis, for each of the DSM programs KCP&L is requesting approval for as part of its portfolio is attached to the testimony of Allen Dennis.

34. **Contact Information.** In addition to signatory counsel, communications and correspondence in regard to this Application should be addressed to:

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VI. MISCELLANEOUS

35. **Rate Design.** In the 441 and 442 Orders, the Commission identified other concepts that it would like the companies to explore as they develop their individual DSM portfolios. The Staff of the Commission, at the Commission's request and upon agreement of the Kansas utilities, is in the process of an informal but thorough review of rate design

implications associated with DSM programs, specifically to encourage energy efficiency. KCP&L agreed to participate in this Dynamic Pricing Project. As these issues have an overall impact on revenues, they are not appropriate for inclusion in this docket.

36. **Schedule Extension Requirement.** KCP&L understands that by proposing an entire portfolio of DSM programs in a single filing, the 441 Order indicates the Company should voluntarily waive the 240-day deadline for the Commission to issue a final order in this docket, unless Staff agrees that such a waiver is unnecessary. KCP&L met with Staff and the Citizen's Utility Ratepayer Board ("CURB") prior to filing this Application. Staff indicated at that time that a waiver of the 240-day deadline was unnecessary since KCP&L has already been offering many of the programs in its proposed portfolio. As such, KCP&L does not waive the 240-day deadline provided for under K.S.A. 66-117 as part of this Application.

37. **Termination of Existing Programs.** As previously stated above, KCP&L's existing DSM programs are pilot programs currently set to expire on December 1, 2010⁸. Those programs will terminate on the completion of the regulatory plan approved by the Commission in the 1025 Docket, and KCP&L expects to withdraw the tariffs related thereto at that time. It is KCP&L's intent to go forward thereafter with its DSM offerings under the portfolio and cost recovery plan proposed herein assuming Commission approval of the programs and KCP&L's proposed DSM Rider.

38. **Provisions are Interdependent.** The portfolio of programs, cost recovery mechanism, and performance incentive mechanism proposed in this Application are elements of a unified and comprehensive approach to DSM by KCP&L. These individual provisions are

⁸ The original expiration date of the Regulatory Plan was June 30, 2010. The parties to the September 9, 2009 Joint Report to the Commission in Docket No. 04-KCPE-1025-GIE requested that the expiration date be extended to the date upon which rates become effective in KCP&L's current rate case, Docket No. 10-KCPE-415-RTS, which is currently set for December 1, 2010.

interdependent of each other. In the event that the Commission does not approve this proposal in its entirety, KCP&L reserves the right to withdraw the proposal. In such event, KCP&L may allow the existing programs to terminate as indicated above with the expiration of the 1025 S&A, and seek other avenues or proposals for offering DSM programs in Kansas in the future.

WHEREFORE, KCP&L respectfully requests that the Commission:

- Approve the portfolio of DSM programs proposed in this Application; and
- Approve the DSM Rider as set forth herein, including the mechanisms for cost recovery and performance incentive, to become effective February 1, 2011.

Respectfully submitted,



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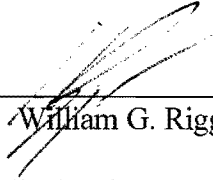
ATTORNEYS FOR KANSAS CITY POWER
& LIGHT COMPANY

VERIFICATION

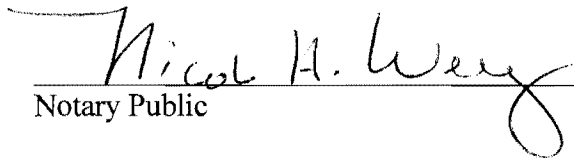
STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

I, William G. Riggins, being duly sworn, on oath state that I am General Counsel and Chief Legal Officer of Kansas City Power & Light Company, that I have read the foregoing Application and know the contents thereof, and that the facts set forth therein are true and correct to the best of my knowledge and belief.

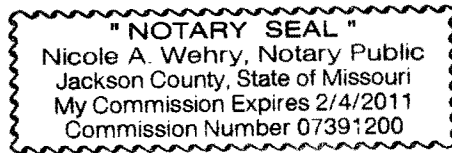
KANSAS CITY POWER & LIGHT COMPANY

By: 
 William G. Riggins

The foregoing Application was subscribed and sworn to before me this June 11th 2010.


Notary Public

My Commission Expires:
Feb. 4 2011



KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 8 Sheet 1 and 2

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed January 2, 2007

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 1 of 1 Sheets

**BUILDING OPERATOR CERTIFICATION PROGRAM
Schedule BOC**

PURPOSE:

This voluntary program is designed to establish and encourage Building Operator Certification through the Northwest Energy Efficiency Council's Building Operator Certification Level 1 and Level 2 curriculums to encourage energy efficient operation of buildings.

AVAILABILITY:

The certification courses funded by this Program will be available through Midwest Energy Efficiency Alliance (MEEA) for any Building Operator employed by a company having at least one Kansas commercial property receiving electrical service from the Company.

Any reimbursements for the successful completion of the certifications are available to any Building Operator associated with at least one Kansas commercial property receiving electrical service from the Company, when they are available.

PROGRAM ADMINISTRATION:

The Program will be administered by MEEA. The Company will utilize an internal program manager to conduct its internal administration of the program.

PROGRAM FUNDING:

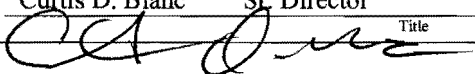
The Company will provide for incentive payments, marketing costs, evaluation cost, and Program administrative costs. This Program and its costs shall be eligible for recovery under the Company's DSM Rider, Schedule DSM, subject to the provisions thereof.

When tuition reimbursements per certification level are offered, they will be paid to the entity paying the tuition. To receive the reimbursement, qualified Building Operators must complete a reimbursement request and submit it to the Company. The reimbursement form is available by contacting the Company directly.

EVALUATION:

Evaluation, measurement and verification of the Program will be completed consistent with requirements established by the Commission in Docket No. 08-GIMX-442-GIV and the pending Docket No. 10-GIMX-013-GIV.

Issued: _____
Month Day Year
Effective: _____
Month Day Year
By: Curtis D. Blanc Sr. Director
Title



FILED
THE STATE CORPORATION COMMISSION OF
KANSAS
By: _____
Secretary

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 July 9, 2009

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 1 of 2 Sheets

**LOW INCOME WEATHERIZATION
Schedule LIW**

PURPOSE:

This Program is intended to assist residential Customers in reducing their energy usage by weatherizing the homes of qualified Customers.

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.

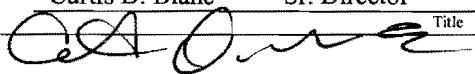
PROGRAM ADMINISTRATION COSTS:

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 percent 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: _____
Month Day Year
Effective: _____
Month Day Year
By: Curtis D. Blanc Sr. Director
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THE STATE CORPORATION COMMISSION OF
KANSAS
By: _____
Secretary

KANSAS CITY POWER & LIGHT COMPANY

Replacing Schedule 6 Sheet 2

(Name of Issuing Utility)

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed July 9, 2009

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 2 of 2 Sheets

**LOW INCOME WEATHERIZATION
Schedule LIW (Continued)**

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 must have 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.

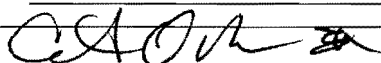
PROGRAM FUNDING:

The Company will provide for incentive payments, marketing costs, evaluation cost, and Program administrative costs. This Program and its costs shall be eligible for recovery under the Company's DSM Rider, Schedule DSM, subject to the provisions thereof.

EVALUATION:

Evaluation, measurement and verification of the Program will be completed consistent with requirements established by the Commission in Docket No. 08-GIMX-442-GIV and the pending Docket No. 10-GIMX-013-GIV.

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Month Day Year
Effective: _____
Month Day Year
By: Curtis D. Blanc Sr. Director
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THE STATE CORPORATION COMMISSION OF
KANSAS
By: _____
Secretary

KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule _____ Sheet _____

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed _____

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

Sheet 1 of 5 Sheets

**Energy Saver Loan Program
Schedule ESLP**

PURPOSE:

The purpose of the Company's Energy Saver Loan Program is to partner with Efficiency Kansas loan program, which provides loans to qualifying Customers for energy efficiency improvements. Efficiency Kansas is a revolving loan fund established by the Kansas Corporation Commission (KCC) to facilitate energy conservation and efficiency improvements in Kansas homes and small businesses. Operated by the State Energy Office (SEO), Efficiency Kansas is funded by federal economic stimulus dollars, which were authorized by the American Recovery and Reinvestment Act of 2009 (ARRA).

DEFINITIONS:

Auditor – Third party companies that are qualified by the SEO to perform energy audits, which are required for projects to qualify for Efficiency Kansas financing. This list of qualified auditors is maintained on the Efficiency Kansas website.

Audit Fee - A Customer will be required to have an audit performed by an SEO qualified Auditor. The cost of the audit will be borne by the Customer. The Auditor will be responsible for collecting the Audit Fee from the Customer.

Certificate of Completion – Document required by the SEO to certify that a final inspection of the project has been conducted by the Auditor and that the Customer, Auditor and the Company jointly agree the project has been fully completed in accordance with the Energy Conservation Plan (ECP) submitted to the Company and approved by the SEO.

Contractor – Third party company hired by the Customer to implement the specified energy efficient measure(s).

Energy Conservation Plan (ECP) – The Auditor will be responsible for estimating resource savings and developing an Energy Conservation Plan (ECP). The ECP will include:

- A prioritized listing of energy conservation and efficiency improvements
- Necessary repairs to a Customer's existing home to ensure the health and safety of the home's occupants
- Cost effectiveness of recommended improvements
- Permanence of recommended improvements
- Non-approved improvements, as applicable
- Projected savings for each recommended improvement
- Cost of each recommended improvement
- Monthly program charge
- Health and safety considerations

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Month Day Year

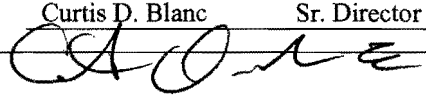
Effective: _____
Month Day Year

By: Curtis D. Blanc Sr. Director
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THE STATE CORPORATION COMMISSION OF
KANSAS

By: _____
Secretary



KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule _____ Sheet _____

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed _____

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 2 of 5 Sheets

**Energy Saver Loan Program
Schedule ESLP (continued)**

DEFINITIONS (continued):

Estimated Resource Savings – The modeled change(s) in costs of all fuel resources consumed at the premise attributable to the efficiency measure(s) recommended. The Auditor will be responsible for calculating savings estimates and will utilize modeling software and techniques that meet SEO established program criteria.

Loan Amount - Customers approved for Efficiency Kansas financing will receive 100 percent of the approved project costs up to \$20,000 for Residential customers and \$30,000 for non-residential customers.

Loan Term - The maximum term of Efficiency Kansas financing is 180 months.

Monthly Program Charge - The Monthly Program Charge is the charge to be included on the Customer's utility bill based on the cost of the proposed measure(s) and the resulting savings. It will be based upon the ECP and must be less than ninety (90) percent of the estimated monthly average savings from all fuel sources associated with the investment. The Program Charge shall be recovered through a monthly line item(s) on the Customer's utility bill.

The Monthly Program Charge will include two components:

1. Principal loan amount. The principal loan amount will be funded by federal economic stimulus dollars. The loan will be coordinated through the Company and the SEO and offered to the Customer at zero percent interest. The principal loan amount will be the lesser of:
 - a. 90 percent of the projected average monthly savings from all applicable fuel sources times the life of the measurement (not to exceed 180 months)
 - b. The selected contractor bid(s).
2. SEO administrative fees. The SEO will charge a \$360.00 customer fee over the life of the loan to offset the SEO's cost of administering Efficiency Kansas.

Number of payments – The number of periods for which the Program Charge will apply at the premise. The duration of the Monthly Program Charge shall be the lesser of the estimated life of the measure or 180 months.

Premise based - The Program repayment loan obligation shall be assigned to the premisses and will survive changes in ownership and/or tenancy.

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Month Day Year

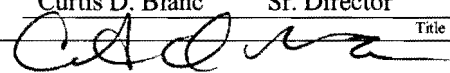
Effective: _____
Month Day Year

By: Curtis D. Blanc Sr. Director
Title

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THE STATE CORPORATION COMMISSION OF
KANSAS

By: _____
Secretary



KANSAS CITY POWER & LIGHT COMPANY

Replacing Schedule _____ Sheet _____

(Name of Issuing Utility)

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed _____

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 3 of 5 Sheets

**Energy Saver Loan Program
Schedule ESLP (continued)**

AVAILABILITY:

This Program is available to Customers taking service under:

1. The Company's Residential Electric Rate Schedule, or
2. The Company's Small General Service Rate Schedules to the extent that the building is no greater than 5,000 square feet and uses a heating and cooling unit with a maximum size of 5 tons and a maximum cooling load of 15 tons.

ELIGIBILITY:

In order to be eligible to participate in the Program, a Customer must meet the following criteria:

- a. Minimum 12 month history with the Company. If Customer has less than a 12 month history with the Company, Customer may provide a minimum of 12 month payment history with previous electric utility provider.
- b. No diversion/tampering history.
- c. No more than 1 returned check in the past 12 months.

This tariff only applies to Program measures permanently installed as fixtures at the premises. Portable efficiency products, such as compact fluorescent lights, do not qualify under this tariff. The Company and the SEO will determine permanence of measures or products.

1. Premises in which Program measures will be installed must be permanently anchored to a foundation.
2. At its sole discretion, the Company may withhold application of this tariff if:
 - a. The structure has an expected life shorter than the payback period, or
 - b. The structure does not meet applicable public safety or health codes.
3. For non-residential Program eligibility, the structure must use residential-sized heating and air conditioning equipment.
4. For rental property eligibility, both owners of the property must be informed of respective obligation and there must be agreement to participate from both parties.

PROGRAM PROCESS:

The following general process will be followed to serve Customers in the Program:

1. The Company will promote the Program to Residential and General Service commercial customers through appropriate communication channels and media. The Company will also coordinate with the SEO to increase public awareness of the Program and Efficiency Kansas financing.
2. Interested Customers will respond by calling the Company.
3. The Company will pre-qualify a Customer. If a Customer meets the Company's eligibility criteria, the Company will refer the Customer to the list of qualified Auditors.
4. The Customer will set an appointment with the Auditor.

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Effective: _____ <div style="text-align: center; font-size: small;">Month Day Year</div>	
By: <u>Curtis D. Blanc</u> Sr. Director <div style="text-align: center; font-size: x-small;">Title</div>	By: _____ <div style="text-align: right; font-size: x-small;">Secretary</div>

KANSAS CITY POWER & LIGHT COMPANY

Replacing Schedule _____ Sheet _____

(Name of Issuing Utility)

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed _____

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 4 of 5 Sheets

**Energy Saver Loan Program
Schedule ESLP (continued)**

PROGRAM PROCESS (continued):

5. The Auditor will perform an Audit, explain the terms of the Program, and develop an Energy Conservation Plan (ECP). The Auditor will develop the monthly Program Charge and share with the Customer.
6. The Auditor will collect the Audit Fee from the Customer.
7. The Customer will select a Contractor(s) to complete the measure(s) deemed as being the most cost-effective and will receive a bid(s) from the Contractor(s).
8. The Customer will submit the ECP and the selected bid(s) to the Company.
9. The Company will submit the ECP and the selected bid(s) to the SEO for review.
10. The SEO will notify the Company of approval or disapproval.
11. The Company will notify the Customer of approval or disapproval.
12. If approved, the Customer will engage the Contractor to implement the measure(s).
13. Upon completion, the Customer will notify the Auditor. The Auditor will determine if a post-retrofit audit is required and schedule with the Customer.
14. If measures are implemented satisfactorily, the Auditor and Customer will sign a Certificate of Completion. Customer's and Landlord's (if applicable) signature of the Certificate of Completion shall indicate acceptance of the ECP and terms of repayment.
15. The Customer will submit the Certificate of Completion to the Company.
16. The Company will sign the Certificate of Completion and submit to the SEO.
17. The KCC will disperse the Loan Amount to the Company.
18. The Company will pay the Loan Amount to the Contractor.
19. The Company will place the Monthly Program Charge to appear on the Customer's bill.
20. The Company will submit the sum of the Monthly Program Charge collected to the KCC on a monthly basis and will adhere to the requirements outlined in Option 1 of "Efficiency Kansas, Program Manual, Guidelines for Participants, Partner Utilities, and Partner Banks" developed by the KCC and SEO.
21. A Customer may opt to pay the remaining principal loan amount at any time during the repayment term. The Company will not assess any pre-payment penalty.
22. The Company will file a KCC-approved notice filing, and renew as needed, for each property since the Loan Amount will be Premise Based and will survive change in tenancy.
23. The Company will provide written notification of the loan obligation to Customers when service is initiated since the Loan Amount will be Premise Based and will survive change in tenancy.
24. The Monthly Program Charge shall be treated the same as Company's charges for electric service for purposes of the KCC Billing Standards. Failure to make payment may result in disconnection in accordance with the Company's approved Terms and Conditions.

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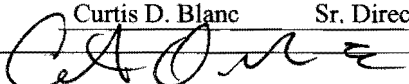
Effective: _____
Month Day Year

By: Curtis D. Blanc Sr. Director
Title

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THE STATE CORPORATION COMMISSION OF
KANSAS

By: _____
Secretary



KANSAS CITY POWER & LIGHT COMPANY

Replacing Schedule _____ Sheet _____

(Name of Issuing Utility)

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed _____

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 5 of 5 Sheets

**Energy Saver Loan Program
Schedule ESLP (continued)**

RESPONSIBILITIES:

Responsibilities, understandings, and authorizations of Customer, Company, Landlord (if applicable) and Auditors shall be evidenced by written agreements, notifications, and disclosures/consents.

TRANSITION IN ROLES:

Unless otherwise specifically set forth in a standard the Program agreement made part of this tariff, responsibility for outstanding Program obligations falls on the successor party when the roles of Customer, Landlord, or Tenant change, provided the required disclosure is made and consent to assume the obligation is obtained. For example, if a Tenant purchases an apartment complex, the individual assumes the obligations of Landlord if disclosure is made and consent is obtained.

PROGRAM ADMINISTRATION:

The Program will be administered by the Company in compliance with terms established by the SEO and KCC.

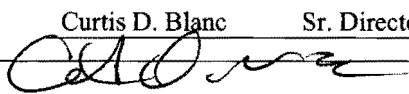
PROGRAM FUNDING:

The Company will provide for incentive payments, marketing costs, evaluation cost, and Program administrative costs. This Program and its costs shall be eligible for recovery under the Company's DSM Rider, Schedule DSM, subject to the provisions thereof.

EVALUATION:

Evaluation, measurement and verification of the Program will be completed consistent with requirements established by the Commission in Docket No. 08-GIMX-442-GIV and the pending Docket No. 10-GIMX-013-GIV. The EM&V will be coordinated with the State Energy Office to meet requirements outlined in the "Efficiency Kansas, Program Manual, Guidelines for Participants, Partner Utilities, and Partner Banks".

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Month Day Year
By: Curtis D. Blanc Sr. Director
Title



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THE STATE CORPORATION COMMISSION OF
KANSAS
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KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 14 Sheet 1

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed March 10, 2008

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 1 of 3 Sheets

**ENERGY STAR® New Homes
Schedule NH**

PURPOSE:

This ENERGY STAR® New Homes (ESNH) Program is designed to improve the energy efficiency of new homes built in the residential construction market by applying efficient construction techniques and high-performance products (windows, doors, appliances, lighting, and heating and cooling systems) in accordance with guidelines set by the U.S. Environmental Protection Agency (EPA) through the ENERGY STAR® program. Homes built under the ENERGY STAR® guidelines are typically 20–30 percent more energy efficient than standard homes.

DEFINITIONS:

Builder – Companies or individuals in the business of constructing new, residential homes within the Company's service territory.

HERS Index – The Home Energy Rating System (HERS) Index is a scoring system established by the Residential Energy Services Network. In that system homes are given a score indicating their relative level of energy efficiency:


- homes built to the specifications of the HERS Reference Home, based on the 2006 International Energy Conservation Code (IECC), score a HERS Index of 100,
- homes that produce as much energy as they consume in a year, achieving net zero energy consumption, score a HERS Index of 0 and
- homes that do not meet the 2006 IECC would have a HERS Index greater than 100.

The lower a home's HERS Index, the more energy efficient it is in comparison to the HERS Reference Home. Each 1-point decrease in the HERS Index corresponds to a 1 percent reduction in energy consumption compared to the HERS Reference Home. Residential Energy Services Network is a non-profit corporation recognized by the EPA as a national standards making body for building energy efficiency rating systems. The International Energy Conservation Code is a model energy building code produced by the International Code Council® providing minimum energy efficiency provisions for residential and commercial buildings.

HERS Rater – A person certified by the Residential Energy Services Network, in accordance with its standards, to produce accurate and fair HERS Index ratings.

Homes – Newly constructed residential structures three stories or less including site constructed homes, attached or detached homes, single or low-rise multi-family residential buildings, system-built homes (structural insulated panels or modular) and log homes. Units in four- and five-story multi-family buildings may qualify for ENERGY STAR® if: 1) The structure is permitted as residential by the local building department; and 2) each residential unit has its own heating, cooling, and hot water systems, separate from other units. The phrase, "permitted as residential structures," is intended to represent units that either fall within the scope of the residential building energy code or are permitted as having a residential use-group, even under conditions where the commercial building energy code applies.

<p>Issued: _____ <small>Month Day Year</small></p> <p>Effective: _____ <small>Month Day Year</small></p> <p>By: <u>Curtis D. Blanc</u> Sr. Director <small>Title</small></p>	<p>FILED _____</p> <p>THE STATE CORPORATION COMMISSION OF KANSAS</p> <p>By: _____ <small>Secretary</small></p>
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KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 14 Sheet 2

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed March 10, 2008

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

Sheet 2 of 3 Sheets

**ENERGY STAR® New Homes
Schedule NH
(continued)**

AVAILABILITY:

The incentive elements of the Program are available to Builders constructing Homes within the Company's service territory. The Company reserves the right to modify or terminate this Program at any time, subject to Commission approval.

PROGRAM PROCESS:

1. The Company will complete the necessary requirements to obtain *Partner* status with ENERGY STAR® to promote the ESNH Program regionally. *Partner* status will provide the Company access to technical information and tools needed to promote and sponsor the Program.
2. The Company will work with Builders in its service territory to help them achieve *Partner* status with ENERGY STAR® under the ESNH Program. *Partner* status for Builders will provide access to technical information and tools needed to comply with the Program and the terms associated with displaying the ENERGY STAR® qualification.
3. As necessary, the Company will expand the availability of certified HERS Raters within the Company's service territory. The HERS program will be used to provide independent, third party verification of ESNH construction.
4. Builders will construct Homes according to one of the following agreement structures:
 - a. Performance agreement – In this structure, Builders submit construction plans for analysis prior to construction. Using standardized software, the analysis will yield a HERS Index rating. Homes built to the specifications of construction plans analyzed to have an index of 85 or below will qualify for ENERGY STAR® rating.
 - b. Prescriptive agreement – In this structure, Builders apply specific energy efficiency measures, pre-defined by ENERGY STAR® and available through its website, to a Home. The measures include high efficiency heating and cooling equipment, ductwork, windows, water heating, lighting, and appliances. Where applicable, ENERGY STAR® rated equipment is specified.
5. For single Homes, the Builder will retain a HERS Rater to complete onsite inspections. Inspections will occur twice, once during the construction and once following completion of the Home to verify compliance with ENERGY STAR® requirements.
6. For Homes that achieve ENERGY STAR® qualification, Builders may request a rebate of \$2,000 per Home toward the incremental cost of meeting ENERGY STAR® requirements. The annual maximum rebate cap per builder per development will be set at \$150,000. The rebate request form is available from the Company.
7. The Company will promote the Program to residential Customers through mediums that may include press releases, direct mailings, bill messages, bill inserts, trade ally communications, and web site materials.
8. The Company will obtain ENERGY STAR® materials and establish a clearinghouse of training materials, marketing resources and tools that can be used by Builders and the Company to implement and promote the Program.

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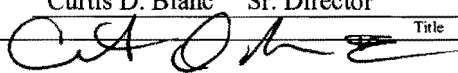
Effective: _____
 Month Day Year

By: Curtis D. Blanc Sr. Director
 Title

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THE STATE CORPORATION COMMISSION OF
 KANSAS

By: _____
 Secretary



KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 14 Sheet 3

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed March 10, 2008

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 3 of 3 Sheets

**ENERGY STAR® New Homes
Schedule NH
(continued)**

PROGRAM ADMINISTRATION:

The Program will be administered by the Company in compliance with terms established by ENERGY STAR®.

PROGRAM FUNDING:

The Company will provide for incentive payments, marketing costs, evaluation cost, and Program administrative costs. This Program and its costs shall be eligible for recovery under the Company's DSM Rider, Schedule DSM, subject to the provisions thereof.

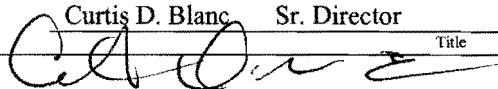
EVALUATION:

Evaluation, measurement and verification of the Program will be completed consistent with requirements established by the Commission in Docket No. 08-GIMX-442-GIV and the pending Docket No. 10-GIMX-013-GIV.

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Month Day Year

By: Curtis D. Blanc Sr. Director
Title



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KANSAS

By: _____
Secretary

KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 13 Sheet 1

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed June 15, 2007

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 1 of 3 Sheets

**COOL HOMES PROGRAM
Schedule CHP**

PURPOSE:

The Cool Homes Program (CHP or Program) is designed to encourage residential Customers to:

- Have central cooling systems evaluated and, if feasible, brought back to factory specifications (re-commissioned), or
- Replace less efficient, central cooling systems with high efficiency central cooling systems.

DEFINITIONS:

ARHI - Air Conditioning, Heating, and Refrigeration Institute. ARHI administers the heating, ventilation, air conditioning and commercial refrigeration (HVACR) industry's performance certification programs for heating and cooling equipment and components.

EER - Energy Efficiency Ratio, the efficiency rating for the air conditioner or heat pump at a particular pair of external and internal temperatures. Calculated by dividing the amount of cooling put out by an air conditioning system, in British thermal units (Btu), divided by the amount of energy put in to it in watts (W). If the air conditioning capacity of a heat pump is 48,000 Btu and the compressor, fan and pumps consume 3.43 kW (3,430 watts), the EER is: $48,000 / 3,430 = 14.0$.

HVAC - Heating, Ventilation, and Air Conditioning

Program Administrator - The Program will be implemented by a third-party vendor specializing in programs of this type.

CHP HVAC Contractor - A properly licensed HVAC contractor who requests to participate in the Cool Homes Program and completes training courses conducted by the Program Administrator.

SEER - Seasonal Energy Efficiency Ratio, the efficiency rating for the air conditioner or heat pump over a range of expected external temperatures (i.e., the temperature distribution for the geographical location for the SEER test). SEER rating is the Btu of cooling output during a simulated, typical cooling season divided by the total electric energy input in watt-hours during the same period. The relationship between SEER and EER is relative because equipment performance is dependent on seasonal temperature, humidity, and air pressure patterns.

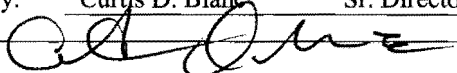
AVAILABILITY:

This Program is available to any current Customer with a central home cooling system receiving service under any generally available residential rate schedule.

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KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 13 Sheet 2

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed June 15, 2007

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 2 of 3 Sheets

**COOL HOMES PROGRAM
Schedule CHP (Continued)**

PROGRAM PROCESS:

Prospective Customer participants will be identified in three ways:

- Customer electric usage data will be evaluated to identify Customers with a high probability of operating less efficient central air conditioning equipment.
- Participating CHP HVAC Contractors may identify existing Customers within the Company service area that are suitable for the Program.
- Customers interested in the Program, but not identified through the above means, may contact a participating CHP HVAC Contractor or the Company directly. A listing of CHP HVAC Contractors will be posted on the Company website.

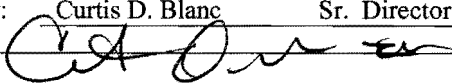
The following general process will be followed to serve Customers in the Program:

- The CHP HVAC Contractor will evaluate the Customer's cooling system using a uniform evaluation process.
- Customers with equipment that can be re-commissioned to operate above an EER rating of 8.0 will be offered an opportunity to return the equipment as close as possible to manufacturer specifications at no cost to the customer. Re-commissioning efforts will be limited to refrigerant charge (+/- 1 lbs.), non-ductwork airflow system adjustments, and basic filters.
- Customers with equipment that cannot be re-commissioned to operate above an EER rating of 8.0 will be considered eligible for a replacement incentive based on the AHRI equipment SEER rating of the new system.
- All participating Customers may receive a cost estimate for replacement of their system with a higher efficiency system. Customer will be responsible for the cost of the replacement equipment. (Estimates for higher efficiency systems will include the applicable incentives.)
- The Customer may choose not to re-commission or replace their equipment.
- Six compact fluorescent lights will be made available to all Customers completing the initial evaluation process regardless of their equipment choices.
- Where work is performed, a second evaluation will be completed to verify the re-commissioning modifications or ensure the quality installation of new equipment.
- Incentives are provided to Customers through the CHP HVAC Contractors to help offset equipment costs and provide for quality installation practices.
- The CHP HVAC Contractor will pass the equipment incentive to the Customer in the form of an itemized credit on the transaction documents.

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Replacing Schedule 13 Sheet 3

Rate Areas No. 2 & 4

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which was filed June 15, 2007

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

Sheet 3 of 3 Sheets

**COOL HOMES PROGRAM
Schedule CHP (Continued)**

PROGRAM ADMINISTRATION:

The CHP Program will be implemented by the Program Administrator. The Program Administrator will be responsible for training, incentive processing, and status reporting associated with the Program.

The Program Administrator will identify and contact HVAC Contractors associated with national brand networks or industry associations to recruit CHP HVAC Contractors. Other HVAC Contractors wishing to become CHP HVAC Contractors may contact the Company directly for consideration. Prospective Contractors will be required to complete training courses conducted by the Program Administrator.

The Company will utilize an internal program manager to conduct its own administration of the Program and will supplement the Administrator with utility-sponsored promotions and advertising.

PROGRAM COST:

Program related services and incentives will be paid to the CHP HVAC Contractor by the Program Administrator who will then bill the Company on a per unit basis. Unit pricing is defined in agreements with the Program Administrator. Incentive amounts of \$650 per unit for SEER 14.0 or SEER 15.0 rated equipment and \$850 per unit for installation of SEER 16.0 or above rated equipment replaced prior to failure of the original equipment will be paid directly to the HVAC contractor. An incentive amount of \$100 per unit for installation of 15.0 SEER or higher rated equipment will be paid to the HVAC contractor for units replaced upon failure or malfunction of the original equipment or where the original equipment has a rated or operating EER above 8.0. The CHP HVAC Contractor will pass the equipment incentive to the Customer in the form of an itemized credit on the transaction documents. Similarly, if re-conditioning is feasible the entire cost will be paid by the Company through the Program Administrator to the CHP HVAC Contractor.

PROGRAM FUNDING:

The Company will provide for incentive payments, marketing costs, evaluation cost, and Program administrative costs. This Program and its costs shall be eligible for recovery under the Company's DSM Rider, Schedule DSM, subject to the provisions thereof.

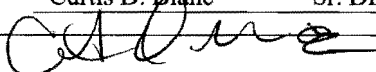
EVALUATION:

Evaluation, measurement and verification of the Program will be completed consistent with requirements established by the Commission in Docket No. 08-GIMX-442-GIV and the pending Docket No. 10-GIMX-013-GIV.

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Replacing Schedule 9 Sheet 1

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed May 22, 2006

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

Sheet 1 of 7 Sheets

COMMERCIAL AND INDUSTRIAL REBATE PROGRAMS
Schedule CIRP

PURPOSE:

The purpose of the Commercial & Industrial Rebate Programs (CIRP or Program) is to proactively impact Commercial & Industrial (C&I) customers' energy use in such a way as to reduce consumption of electric energy and/or reduce peak energy and demand levels.

AVAILABILITY:

Services under this tariff shall be available to customers qualifying for service under Small General Service (S), Medium General Service (M), Large General Service (L) and Large Power Service (P) rate schedules.

DESCRIPTION:

The reduction in energy consumption and demand will be accomplished through:

- Prescriptive Energy Efficiency Measures
- Custom Energy Efficiency Measures
- Request For Proposals (RFP) Projects

Program offerings, structures, availability, and rebates may be adjusted to respond to market conditions in order to achieve the desired energy and demand reductions.

DEFINITIONS:

Rebate – Any consideration provided by the Company which encourages the adoption of energy efficient equipment or systems.

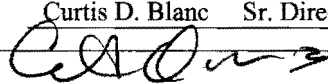
Program Administrator – Third party company hired by the Company to assist in the administration, implementation, and delivery of services directly to Participants with the Company.

Program Year – Program Year shall mean a specific calendar year.

Project – One or more measures proposed by a Customer in a single application.

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KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)
Rate Areas No. 2 & 4
(Territory to which schedule is applicable)

Replacing Schedule 9 Sheet 2

which was filed May 22, 2006

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 2 of 7 Sheets

COMMERCIAL AND INDUSTRIAL REBATE PROGRAMS
Schedule CIRP
(Continued)

PROGRAM ADMINISTRATION:

The Prescriptive Energy Savings Measures, Custom Energy Savings Measures, and RFP Projects of the Program will be implemented by the Program Administrator. The Program Administrator will be responsible for items such as incentive processing, rebate processing, communication with the Applicant to resolve application issues, and status reporting associated with the Program.

The Company will utilize an internal program manager to conduct its own administration of the program. The Company's program manager will maintain oversight of the Program.

PROGRAM FUNDING:

The Company will provide for incentive payments, marketing costs, evaluation cost, and Program administrative costs. This Program and its costs shall be eligible for recovery under the Company's DSM Rider, Schedule DSM, subject to the provisions thereof.

EVALUATION:

Evaluation, measurement and verification of the Program will be completed consistent with requirements established by the Commission in Docket No. 08-GIMX-442-GIV and the pending Docket No. 10-GIMX-013-GIV.

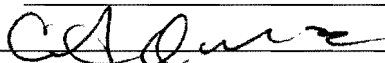
DETAILED PROGRAM DESCRIPTIONS:

The following pages contain descriptions and terms for the individual programs being offered under this tariff.

PROGRAM MEASURE CHANGE PROCESS:

As conditions warrant, certain Measures and Rebates provided under the programs covered by this tariff may be revised. Revisions to Measures and Rebates will be requested through the normal tariff revision process with the expectation of an expedited 30 day approval process, where possible.

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No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 3 of 7 Sheets

COMMERCIAL AND INDUSTRIAL REBATE PROGRAMS
Schedule CIRP
(Continued)

C&I PRESCRIPTIVE REBATE PROGRAM

PURPOSE:

The Commercial and Industrial (C&I) Prescriptive Rebate Program will provide pre-set rebates for energy-efficient products that are readily available in the marketplace and will target measures for which energy savings can be reliably deemed, or calculated, using simple threshold criteria. Rebates will be fixed per Eligible Energy Efficiency Measure. A principal objective of this program is to provide an expedited, simple solution for customers interested in purchasing efficient technologies that will produce verifiable savings.

AVAILABILITY:

This program is voluntary and available to customers qualifying pursuant to the CIRP Availability section and meeting the Program Provisions below.

DEFINITIONS:

Eligible Energy Efficiency Measure – An energy efficiency measure which is readily available in the marketplace. In addition, those definitions applicable pursuant to the CIRP Definitions section.

PROGRAM PROVISIONS:

Rebates for certain predetermined Eligible Energy Efficiency Measures will be provided to qualifying customers who provide acceptable documentation of the purchase and installation of the Eligible Energy Efficiency Measures as indicated below:

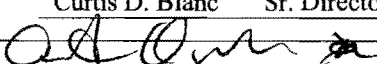
- Customer must complete a Prescriptive Rebate Application form found on the Company's website at www.kcpl.com;
- Customer must provide proof of equipment purchase and installation;
- Measures must be installed after the effective date of this tariff;
- Measures which receive a Rebate under the Custom Rebate Program and/or RFP Program are not eligible for this Prescriptive Rebate Program;
- Projects receiving Rebates may be physically verified prior to Rebate issuance.

Rebate applications for different energy saving measures at the same facility may be submitted. A customer with multiple facilities may submit applications for each facility. The combined Rebates provided under both the Prescriptive Rebate Program and the Custom Rebate Program are limited to less than or equal to \$150,000 per site per Program Year and less than or equal to \$250,000 per customer per Program Year. However, Projects exceeding the \$150,000 and \$250,000 limits with exceptional benefits may be allowed by the Company on a case-by-case basis. Prior to allowing such an exception, the Company shall provide the Commission Staff with documentation supporting the exception.

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No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 4 of 7 Sheets

COMMERCIAL AND INDUSTRIAL REBATE PROGRAMS
Schedule CIRP
(Continued)

C&I PRESCRIPTIVE REBATE PROGRAM (Continued)

MEASURES:

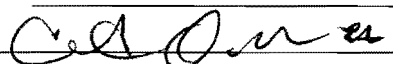
The Company will maintain and make available a list of cost-effective energy efficiency Prescriptive Measures on the Company website. The Prescriptive Measure list, rebate amounts, and minimum efficiency criteria may be updated as market conditions change. Measure category headings may include but are not limited to:

- Lighting & Controls
- Motors, Pumps, and Variable Frequency Drives
- HVAC
- Process
- Energy Star® Equipment Business Computing
- Food Service & Refrigeration

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Rate Areas No. 2 & 4

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No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 5 of 7 Sheets

COMMERCIAL AND INDUSTRIAL REBATE PROGRAMS
Schedule CIRP
(Continued)

C&I CUSTOM REBATE PROGRAM

PURPOSE:

The Custom Rebate Program will provide financial assistance to customers to support implementation of energy efficiency improvement opportunities which are available at the time of new equipment purchases, facility modernization, and industrial process improvement. Rebates can be provided for both New Construction and Retrofit projects.

AVAILABILITY:

This program is voluntary and available to customers qualifying pursuant to the CIRP Availability section and meeting the Program Provisions below.

DEFINITIONS:

Those definitions applicable pursuant to the CIRP Definitions section.

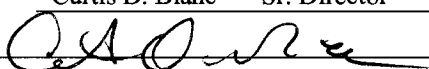
PROGRAM PROVISIONS:

Customers may apply for a Custom Rebate for measures under consideration which:

- Reduce energy consumption and/or peak energy and demand compared to the currently installed system or the standard efficiency system currently available;
- Have not yet been installed or for which a commitment has not yet been made;
- Have not received a rebate under the Prescriptive Rebate Program and/or RFP program;
- Are not listed as a Prescriptive Rebate Program Eligible Energy Efficiency Measure on the Company website; and
- Are a part of a Project having an installed Societal Benefit Cost ratio greater than 1.0.

Prior to purchasing and installing measure(s), Customer must submit a Custom Rebate Application form that provides data about the applicable facility and potential measure(s). The Company or Program Administrator will perform a desk review of the application to determine cost-effectiveness and Rebate level for each measure. The Company may perform a site visit to verify baseline conditions. If approved, the Program Administrator will reserve the Rebate amount and notify the customer of the measure(s) approval.

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**COMMERCIAL AND INDUSTRIAL REBATE PROGRAMS
Schedule CIRP
(Continued)**

C&I CUSTOM REBATE PROGRAM(Continued)

Following installation of approved measures, the Customer will submit required documentation of final measure costs and a completion date for each measure. If necessary, the Rebate level will be recalculated. The Company will perform random on-site inspections of any submitted projects.

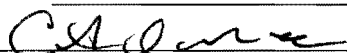
REBATES:

Custom Rebates are one time payments, calculated as the lesser of the buy down to a specified simple payback or a predetermined percentage of the incremental cost of the higher efficiency equipment, system, or energy saving measure. Rebate applications for different energy saving measures at the same facility may be submitted. A Customer with multiple facilities may submit applications for each facility. The combined Rebates provided under both the Prescriptive Rebate Program and the Custom Rebate Program is limited to less than or equal to \$150,000 per site per Program Year and less than or equal to \$250,000 per customer per Program Year. However, Projects exceeding the \$150,000 and \$250,000 limits with exceptional benefits may be allowed by the Company on a case-by-case basis. Prior to allowing such an exception, the Company shall provide the Commission Staff documentation supporting the exception.

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No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 7 of 7 Sheets

COMMERCIAL AND INDUSTRIAL REBATE PROGRAMS
Schedule CIRP
(Continued)

C&I REQUEST FOR PROPOSAL PROGRAM

PURPOSE:

The primary purpose of the Request for Proposal (RFP) Program is to encourage the Company's commercial and industrial customers to install energy efficient process, refrigeration, and other efficient equipment and controls in existing facilities beyond what they would have installed without the program. The program is to have special offers that stimulate larger package projects, not just measures or specific systems. More specifically, the program is designed to:

- Stimulate the market and move stalled efficiency projects.
- Provide incentives to facility owners and operators for the installation of high-efficiency process, refrigeration and other equipment and controls.
- Provide a marketing mechanism for consulting engineers, process and equipment contractors and distributors to promote specific energy efficient equipment to end users.

AVAILABILITY:

This program is voluntary and available to customers qualifying pursuant to the CIRP Availability section and meeting the Program Provisions below.

PROGRAM PROVISIONS:

The C&I RFP Program provides incentives to customers on a very targeted and limited time basis for the installation of innovative and non-standard energy-efficiency equipment and controls. This program pertains to existing facilities only. This program is offered to targeted customers with specific criteria. The RFP will have a limited time with a specific maximum budget.

The RFP Program has the flexibility to target specific technologies or types of projects. The RFP program includes customer educational and promotional pieces designed to assist facility owners, operators and decision makers with the information necessary to respond to the RFP with proposals. The RFP Program also includes customer and industry partner education to assist with understanding the technologies that are being promoted, the incentives that are offered, and how the program functions.

The RFP Program is a financial assistance and education program that provides incentives for the installation of energy efficiency measures in existing non-residential facilities in response to the unique specifications of the RFP. Customers/Contractors will submit their project proposals in response to the RFP including savings estimates. Company staff or its Program Administrator will review these proposals and savings estimates and determine if they qualify for a financial award. This review of the savings analysis helps assure that Company funds are being cost effectively used to promote efficiency.

REBATES:

Incentives will be identified within the RFP on a per kWh and per kW saved basis so that both energy and demand savings will be rewarded. Levels of incentives will vary depending on the specific RFP.

Per site and per customer maximums identified in the Prescriptive Rebate Program and the Custom Rebate Program does not apply to the C&I RFP Program.

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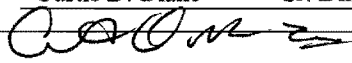
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KANSAS CITY POWER & LIGHT COMPANY

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Replacing Schedule 7 Sheet 1

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed September 6, 2007

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 1 of 3 Sheets

**RESIDENTIAL, SMALL AND MEDIUM GENERAL SERVICE AIR CONDITIONER CYCLING RIDER ENERGY OPTIMIZER PROGRAM
Schedule EO**

PURPOSE:

The Energy Optimizer Program (Program) is intended to help reduce system peak load and thus defer the need for additional capacity. The Program accomplishes this by cycling a Participant's air conditioning unit (and/or other appliances) temporarily in a Company coordinated effort to limit overall system peak load.

AVAILABILITY:

This Program is available to any Customer currently receiving or requesting service under any residential rate schedule or any small or medium general service rate schedule. Customers must also have adequate paging and/or radio coverage and have a working central air conditioning system of suitable size and technology to be controlled by the programmable thermostat and economically contribute to the Program. Residential property owner's (owner occupant or landlord for a rental property) permission is required to participate. Commercial property owner's permission may be required for the tenant to participate, based on thermostat ownership. The Company may limit the number of participants based on available Program budget and reserves the right to modify or terminate the Program at any time subject to Commission approval.

CONTROLS AND INCENTIVES:

Participating Customers will receive a programmable thermostat that can be controlled via radio signals sent to the unit by the Company or its assignees. During a curtailment event, the Company or its assignee will send a radio signal to the thermostat that will cycle the air conditioner and/or other equipment. Customers may use the programmable thermostat throughout the year to improve heating and cooling efficiency. Other Company-supplied control devices may be substituted for, or provided in addition to, the programmable thermostat to control other appliances such as pool pumps or electric water heaters with the Customer's permission.

CYCLING METHODS:

The Company may elect to cycle participating Customers' air conditioner units either by raising the thermostat setting, or by directly cycling the compressor unit.

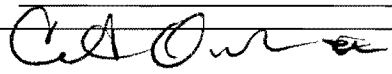
NOTIFICATION:

The Company will notify participating Customers of a curtailment event via a website and/or on the thermostat. The notification can occur prior to or at the start of a curtailment event.

CURTAILMENT SEASON:

The curtailment season will extend from June 1 to September 30.

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	By: _____ Secretary



KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 7 Sheet 2

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed September 6, 2007

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 2 of 3 Sheets

RESIDENTIAL, SMALL AND MEDIUM GENERAL SERVICE AIR CONDITIONER CYCLING RIDER ENERGY OPTIMIZER PROGRAM
Schedule EO (Continued)

CURTAILMENT LIMITS:

The Company may call a curtailment event any weekday, Monday through Friday, excluding Independence Day and Labor Day, or any day celebrated as such. A curtailment event occurs whenever the thermostat is being controlled by the Company. The Company may call a maximum of one curtailment event per day lasting no longer than four (4) hours per Customer. The Company is not required to curtail all participating Customers simultaneously and may stagger curtailment events across participating Customers.

CURTAILMENT OPT OUT PROVISION:

Participating Customers may opt out of one air conditioning cycling curtailment event each month during the Curtailment Season by notifying the Company at any time prior to or during a curtailment event. Notification must be communicated to the Company by using the Company's website (www.kcpl.com) or by calling the Company at the telephone number provided with the air conditioner cycling agreement. If an event does not occur on the day the Customer requested to opt out, the Customer is not considered as having used their once-per-month opt out provision.

NEED FOR CURTAILMENT:

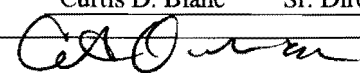
Curtailments may be requested for operational or economic reasons. Operational curtailments may occur when any physical operating parameter(s) approach a constraint on the generation, transmission or distribution systems or to maintain the Company's capacity margin requirement. Economic reasons may include any occasion when the marginal cost to produce or procure energy or the price to sell the energy in the wholesale market is greater than a Customer's retail price.

CONTRACT TERM:

Initial contracts will be for a term of three years. Thereafter, the contract will continue to be in force, except that the Customer may terminate the program on 90 days written notice. At the end of the initial contract term, the thermostat becomes the Customer's property; and, so long as the contract is in force, the Company will provide maintenance and repair to the programmable thermostat as may be required due to normal use. If the Customer leaves the Program prior to the end of the initial contract, the Company will have 60 days thereafter to remove the thermostat and/or other control equipment; otherwise, any equipment previously installed at Company expense becomes the Customer's property. With the exception of thermostats, the Company may retain ownership of all other Company supplied control devices after the initial contract term.

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Rate Areas No. 2 & 4

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

Sheet 3 of 3 Sheets

**RESIDENTIAL, SMALL AND MEDIUM GENERAL SERVICE AIR CONDITIONER CYCLING RIDER
ENERGY OPTIMIZER PROGRAM
Schedule EO (Continued)**

PROGRAM FUNDING:

The Company will provide for incentive payments, marketing costs, evaluation cost, and Program administrative costs. Such costs shall be eligible for recovery under the Company's DSM Rider, Schedule DSM, subject to the provisions thereof.

EVALUATION:

Evaluation, measurement and verification of the Program will be completed consistent with requirements established by the Commission in Docket No. 08-GIMX-442-GIV and the pending Docket No. 10-GIMX-013-GIV.

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(Name of Issuing Utility)

Replacing Schedule 76 Sheet 1

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed April 30, 2008

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 1 of 6 Sheets

**MPOWER RIDER
Schedule MP**

PURPOSE:

This voluntary rider is intended to help defer future generation capacity additions and provide for improvements in energy supply.

AVAILABILITY:

This Rider is available to any Customer currently receiving or requesting service under any generally available non-residential rate schedule. The Customer must have load curtailment capability of at least 25 kW during the Curtailment Season within designated Curtailment Hours and must agree to establish Firm Power Levels as set forth herein. Availability is further subject to the economic and technical feasibility of the installation of required Company equipment. The Company reserves the right to limit the total Curtailable Load determined under this Rider. MPOWER is a replacement for the Peak Load Curtailment Credit (PLCC). References to PLCC found in other tariffs shall be considered references to MPOWER. PLCC contracts existing at the time of approval of this MPOWER Rider will be honored.

NEED FOR CURTAILMENT:

Curtailments can be requested for operational or economic reasons. Operational curtailments may occur when physical operating parameters approach becoming a constraint on the generation, transmission, or distribution systems or to maintain the Company's capacity margin requirement. Economic reasons may include any occasion when the marginal cost to produce or procure energy or the opportunity to sell the energy in the wholesale market is greater than the Customer's retail price.

AGGREGATION OF A CUSTOMER'S MULTIPLE ACCOUNTS:

For the purposes of this Rider only, and at the Company's option, a Customer with multiple accounts may request that some or all of its accounts be aggregated with respect to Estimated Peak Demands, Curtailable Loads and Firm Power Levels, so long as each account in the aggregation is able to provide a Curtailable Load of at least 25 kW.

The aggregated account will be treated as a single account for purposes of calculating the Program Participation Payments, Curtailment Occurrence Payments and Penalties.

TERM OF CONTRACT:

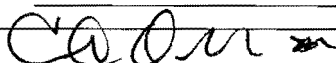
Contracts under this Rider shall be for a one-year, three-year, or five-year term. Thereafter, Customers may enter into a new contract for a term of one-year, three-years, or five-years subject to the terms and conditions of this Rider as may be modified from time to time. Written notice by either the Customer or Company to terminate a contract must be given at least thirty (30) days prior to commencement of the Curtailment Season.

CURTAILMENT SEASON:

The Curtailment Season shall be June through September. The Curtailment Season will exclude Independence Day, Labor Day, or the days celebrated as such.

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KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 76 Sheet 2

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed April 9, 2007

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 2 of 6 Sheets

**MPOWER RIDER
Schedule MP**

(Continued)

CURTAILMENT HOURS:

Curtailment will occur during the hours of 12:00 noon through 10:00 pm, Monday through Friday, during the Curtailment Season. The Curtailment Hours associated with a Curtailment Event will be established at the time of the Curtailment Notification.

CURTAILMENT NOTIFICATION:

Customers will receive Curtailment Notification a minimum of four hours prior to the start time of a Curtailment Event.

CURTAILMENT LIMITS:

The Customer shall specify in the Contract, the Maximum Number of Curtailment Events for which the Customer agrees to curtail each Curtailment Season. The Maximum Number of Curtailment Events shall not exceed ten (10) separate occurrences per year. Each occurrence shall be no less than two hours and no more than eight hours per day and no more than one occurrence will be required per day. The Company may call a Curtailment Event no more than three consecutive days per calendar week. The cumulative Curtailment Hours per Customer shall not exceed eighty (80) hours in any calendar year.

ESTIMATED PEAK DEMANDS:

The Estimated Peak Demand is the average of the Customer's Monthly Maximum Demand for Monday through Friday between 12:00 noon and 10:00 pm for June through September of the previous year.

The Company may use such other data or methodology as may be appropriate to establish the Estimated Peak Demand or to otherwise measure the Customer's curtailment performance.

ESTIMATED PEAK DEMAND MODIFICATIONS:

The Company may review and, if necessary, adjust the Customer's Estimated Peak Demand based on evidence that the Customer's actual peak demand has changed, or will change, significantly from the Estimated Peak Demand currently being used to calculate Curtailable Load. If a change in the Customer's Estimated Peak Demand results in a change in their Curtailable Load, the Customer shall lose and/or repay their curtailment payments proportional to the number of days curtailment was not available and the change in the Curtailable Load.

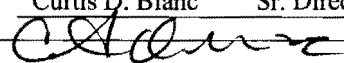
FIRM POWER LEVELS:

During the months of June through September, the Customer's Firm Power Level, which is the maximum demand level to be drawn during a Curtailment Event, shall be set at least 25 kW less than the Customer's Estimated Peak Demand.

The Company may use a Test Curtailment to establish the Firm Power Levels for the Customer.

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Sheet 3 of 6 Sheets

**MPOWER RIDER
Schedule MP**

(Continued)

FIRM POWER LEVEL MODIFICATION:

After the Curtailment Season and upon ninety (90) days written notice by the Customer, the Firm Power Level may be modified to reflect significant change in Customer load, subject to verification and approval by the Company. Any adjusted Firm Power Level shall continue to provide for a minimum Curtailable Load of 25 kW. At any time the Company may adjust the Customer's Firm Power Level downward based on evidence that the Customer's actual demand has dropped, or will drop, significantly from the Estimated Peak Demand. Any change in Firm Power Level that decreases Curtailable Load for the Customer shall result in re-evaluation of all curtailment compensation to the Customer including any payment or credits made in advance of the Curtailment Season. The Customer shall repay the Company prior payments/credits made in excess of the curtailment compensation due based upon the decreased level of Curtailable Load.

CURTAILABLE LOAD:

Curtailable Load shall be that portion of a Customer's Estimated Peak Demand that the Customer is willing and able to commit for curtailment and the Company agrees to accept for curtailment. The Curtailable Load shall be the same amount for each month of the contract. Under no circumstances shall the Curtailable Load be less than 25 kW. Curtailable Load is calculated as the difference between the Estimated Peak Demand as determined above, and the Firm Power Level.

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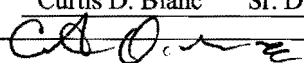
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(Name of Issuing Utility)

Replacing Schedule 76 Sheet 4

Rate Areas No. 2 & 4

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**MPOWER RIDER
Schedule MP**

(Continued)

CUSTOMER COMPENSATION:

Customer compensation shall be defined within each Customer contract and will be based on contract term, Maximum Number of Curtailment Events and the number of actual curtailment occurrences per season. Timing of all payments/credits shall be specified in the contract with each Customer. Payments shall be paid to the Customer in the form of a check or bill credit as specified in the contract. The credits shall be applied before any applicable taxes. All other billing, operational, and related provisions of other applicable rate schedules shall remain in effect.

Compensation will include:

INITIAL PAYMENT: A Customer, upon agreement with the Company, may receive a one-time payment to purchase specific equipment necessary to participate in the MPOWER Rider. The amount of any Initial Payment will be deducted from the Program Participation Payment on a net present value (NPV) basis calculated by the Company and in no case will the Initial Payment amount exceed the Program Participation Payment amount. The Initial Payment amount will not be greater than a level which would result in an annual Program Participation Payment of less than \$2.50 per kilowatt of Curtailable Load per Curtailment Event.

PROGRAM PARTICIPATION PAYMENT: For each Curtailment Season, Customer shall receive a payment/credit of a minimum of:

- One-year contract: \$2.50 per kilowatt of Curtailable Load multiplied by the Maximum Number of Curtailment Events. Customers enrolling in their third or fourth consecutive one-year contracts will receive \$3.25 per kilowatt of Curtailable Load multiplied by the Maximum Number of Curtailment Events. Customers enrolling in their fifth or greater consecutive one-year contract will receive \$4.50 per kilowatt of Curtailable Load multiplied by the Maximum Number of Curtailment Events.
- Three-year contract: \$3.25 per kilowatt of Curtailable Load multiplied by the Maximum Number of Curtailment Events.
- Five-year contract: \$4.50 per kilowatt of Curtailable Load multiplied by the Maximum Number of Curtailment Events.

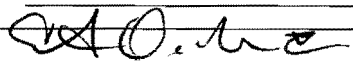
The Program Participation Payment will be divided by the number of months in the Curtailment Season and applied as bill credits equally for each month of the Curtailment Season.

CURTAILMENT OCCURRENCE PAYMENT: The Customer will also receive \$0.35 per kW of Curtailable Load for each Curtailment Hour during which the Customer's metered demand is less than or equal to his Firm Power Level.

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Replacing Schedule 76 Sheet 5

Rate Areas No. 2 & 4

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**MPOWER RIDER
Schedule MP (Continued)**

PENALTIES:

Failure of the Customer to effect load reduction to its Firm Power Level or lower in response to any Company request for curtailment shall result in the following reduction in, or refund of, Program Participation Payments and Curtailment Occurrence Payments for each such failure as outlined below:

Curtailment Occurrence Payment reduction: Customer will forfeit Curtailment Occurrence Payment for every hour during which it fails to effect load reduction to its Firm Power Level or lower.

Program Participation Payment reduction: Customer will receive reduced future Program Participation Payments or a bill debit, in an amount equal to 150% of the Program Participation Payment divided by the Maximum Number of Curtailment Events, the result of which is multiplied by the percentage by which the customer underperformed during a curtailment occurrence.

Any Customer who fails to reduce load to its Firm Power Level on three or more days within any Curtailment Season may be ineligible for this Rider for a period of two years from the date of the third failure.

CURTAILMENT CANCELLATION:

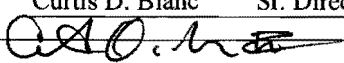
The Company reserves the right to cancel a scheduled curtailment prior to the start time of such curtailment. However, if cancellation occurs with less than two hours of the notification period remaining prior to commencement of a curtailment occurrence, the canceled curtailment shall be counted as a separate occurrence with a zero-hour duration.

TEST CURTAILMENT:

The Company reserves the right to request a test Curtailment once each year and/or within three months after a failure to effect load reduction to its Firm Power Level or lower with any request for curtailment. Test Curtailments do not count toward the Maximum Number of Curtailment Events. Customers will not be compensated for Test Curtailments.

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Replacing Schedule 76 Sheet 6

Rate Areas No. 2 & 4

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**MPOWER RIDER
Schedule MP**

(Continued)

VOLUNTARY LOAD REDUCTION:

Customers served on this Rider also will be served on the Voluntary Load Reduction Rider (Schedule VLR), subject to the paragraph entitled "Special Provisions for Customers Served on Schedule MP." A separate contract for service on Schedule VLR is not required for Customers served on Schedule MP.

ADDITIONAL VOLUNTARY EVENTS

At any time while the Customer's contract is in effect, the Company may request a Customer to participate, on a voluntary basis, in additional Curtailment Events. Customers who are asked and who participate in these additional voluntary curtailments will receive Curtailment Occurrence Payments as outlined previously in this Rider, but will not receive additional Program Participation Payments. This provision applies to all Customers whose contracts are still in force, whether or not they have participated in a number of events equal to their chosen Maximum Number of Events.

At its sole discretion, the Company will decide to apply the terms of Voluntary Load Reduction or Additional Voluntary Events for a given Curtailment Event.

PROGRAM FUNDING:

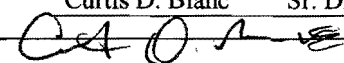
The Company will provide for customer compensation, marketing costs, evaluation cost, and Program administrative costs. This Program and its costs shall be eligible for recovery under the Company's DSM Rider, Schedule DSM, subject to the provisions thereof.

EVALUATION:

Evaluation, measurement and verification of the Program will be completed consistent with requirements established by the Commission in Docket No. 08-GIMX-442-GIV and the pending Docket No. 10-GIMX-013-GIV.

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Replacing Schedule _____ Sheet _____

Rate Areas No. 2 & 4

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**DEMAND SIDE MANAGEMENT RIDER
Schedule DSM**

APPLICABILITY:

This Demand Side Management (DSM) Rider (Schedule DSM) shall be applicable to all Kansas Retail Rate Schedules for the Company with the exception of Lighting Schedules LS, AL, CL, ML, MOL and TR.

PURPOSE:

This DSM Rider is designed to recover DSM Portfolio Costs associated with the Company's Commission-approved DSM Portfolio, including the applicable tier of threshold savings amounts. The DSM Portfolio consists of the energy efficiency, demand response and education programs approved in Docket No. 10-KCPE-xxx-TAR. The DSM Portfolio may be modified by Commission approval to add or remove programs.

BASIS:

DSM Portfolio Costs will be recovered using a DSM factor applied to each customer's bill. The DSM factor will be applied to the customer's usage on a kilowatt-hour basis (\$/kWh). Retail customer charges for DSM Portfolio Costs are determined by multiplying the kilowatt-hours of electricity billed by the corresponding DSM factor. The charges associated with this DSM Rider will be identified and shown as a separate line on the customer's bill. A separate DSM factor will be calculated for each customer class based upon the demand allocator and total kWh for each class. The DSM factor (DSMFactor) for each customer class will be calculated by applying a class Demand Allocator and then dividing by the total kilowatt-hours (kWh) for that class.

TERM:

This DSM Rider shall remain in effect until such time as all Commission-approved amounts are recovered.

DEMAND SIDE MANAGEMENT RIDER AMOUNT CALCULATION:

Prior to January 1 of each DSM year, a DSM Factor (DSMF_p) will be calculated for each month of the DSM year as follows:

$$DSMFactor_{(class)} = \frac{(EECosts_p + DRCosts_p + Education_p + Research_p + True_A) \times DA_{(class)}}{kWh_{P(class)}}$$

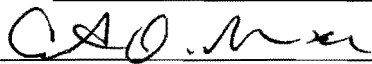
Where:

$$EECosts_p = (EEProgram_p + \sum_{y=current\ year}^{3\ years\ (current\ +\ 2\ preceding)} ((EENetBenefit_p * EE\ Tier\ 2\ Threshold) * 1/3)_y)$$

for example:

$$EECosts_{P_{year1}} = (EEProgram_{P_{year1}} + ((EENetBenefit_{P_{year1}} * EE\ Tier\ 2\ Threshold) * 1/3))$$

$$EECosts_{P_{year2}} = (EEProgram_{P_{year2}} + ((EENetBenefit_{P_{year1}} * EE\ Tier\ 2\ Threshold) * 1/3) + ((EENetBenefit_{P_{year2}} * EE\ Tier\ 2\ Threshold) * 1/3))$$

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Sheet 2 of 6 Sheets

**DEMAND SIDE MANAGEMENT RIDER
Schedule DSM**

(continued)

DEMAND SIDE MANAGEMENT RIDER AMOUNT CALCULATION (continued):

$$EECosts_{Pyear3} = (EEProgram_{Pyear3} + ((EENetBenefit_{Pyear1} * EE Tier 2 Threshold) * 1/3) + ((EENetBenefit_{Pyear2} * EE Tier 2 Threshold) * 1/3) + ((EENetBenefit_{Pyear3} * EE Tier 2 Threshold) * 1/3))$$

$$EECosts_{Pyear4} = (EEProgram_{Pyear4} + ((EENetBenefit_{Pyear2} * EE Tier 2 Threshold) * 1/3) + ((EENetBenefit_{Pyear3} * EE Tier 2 Threshold) * 1/3) + ((EENetBenefit_{Pyear4} * EE Tier 2 Threshold) * 1/3))$$

And continuing for Year 5 and following. For preceding years, actual will be used instead of projected when available.

EEProgram_p = Projected annual cost for the DSM Portfolio energy efficiency programs.

EENetBenefit_p = For a program year, the EEAvoidedCost_p less the EEProgram_p cost. The Company's share of the EENetBenefit_p will be collected 1/3 per year over a three year period.

EEAvoidedCost_p = The net present value of the cost of supplying power (both energy and demand cost associated with generation, transmission, and distribution) that the Company would have incurred without the EEProgram_p cost.

EE Thresholds = The below thresholds for DSM Portfolio energy efficiency programs are based on the percent of kWh savings achieved, compared to the EE Energy Savings Target.

	<u>Low</u>	<u>High</u>	<u>Percent Earned</u>
Tier 1	>=120%		54%
Tier 2	80%	119%	50%
Tier 3	40%	79%	46%
Tier 4		<=39%	42%

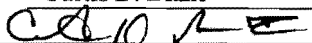
EE Energy Savings Target_p=Projected kWh savings from the DSM Portfolio energy efficiency programs.

$$DRCosts_p = DRProgram_p + (DRNetBenefit_p * DR Tier 2 Threshold)$$

DRProgram_p = Projected annual cost for the DSM Portfolio demand response programs.

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**DEMAND SIDE MANAGEMENT RIDER
Schedule DSM**

(continued)

DEMAND SIDE MANAGEMENT RIDER AMOUNT CALCULATION (continued):

DRNetBenefit_p = For a program year, the DRAvoidedCost_p less the DRProgram_p cost.

DRAvoidedCost_p = The net present value of the cost of supplying power (both energy and demand cost associated with generation, transmission, and distribution) that the Company would have incurred without the DRProgram_p.

DR Thresholds = The below thresholds for DSM Portfolio demand response programs are based on the percent of kW savings achieved, compared to the DR Energy Savings Target.

	<u>Low</u>	<u>High</u>	<u>Percent Earned</u>
Tier 1	>=120%		27%
Tier 2	80%	119%	25%
Tier 3	40%	79%	23%
Tier 4		<=39%	21%

DR Energy Savings Target_p=Projected kW savings from the DSM Portfolio demand response programs.

EM&V Process = Evaluation, measurement and verification of the DSM Portfolio will be completed consistent with requirements established by the Commission in Docket No. 08-GIMX-442-GIV and the pending Docket No. 10-GIMX-013-GIV.

Education_p = Projected annual cost for educational programs.

Research_p = Projected annual cost for the consumer market research program.

DA_(class) = The demand allocator for the applicable classes.

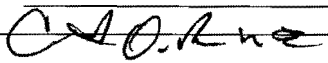
kWh_{P(class)} = The projected kWh electric sales for the Kansas jurisdiction for the applicable class in the EE year.

True_A = The annual true-up amount for an EE year, to be calculated by April 1 of the year following the EE year and to be applied for a twelve-month period beginning July 1 of the year following the EE year. The True_A amount will reflect any difference between the total EE revenue for the Retail sales during the EE year and the actual costs incurred to achieve the Energy Savings plus the applicable Tier of Threshold Savings. The True_A amount may be positive or negative. Any remaining balances from prior true-up periods will be added.

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Sheet 4 of 6 Sheets

DEMAND SIDE MANAGEMENT RIDER

Schedule DSM

(continued)

True_A = DSMRev_A - (EECosts_A_yearx + DRCosts_A + Education_A + Research_A) + True_PRIOR

Where:

DSMRev_A = Actual DSM Revenue for Kansas Retail sales during the DSM year.

EECosts_A = EEProgram_A + sum over 3 years (current + 2 preceding) of ((EENetBenefit_A * EE Tier X Threshold) * 1/3)_y, where y=current year

for example:

EECosts_A_year1 = (EEProgram_A_year1 + ((EENetBenefit_A_year1 * EE Tier X Threshold) * 1/3))

EECosts_A_year2 = (EEProgram_A_year2 + ((EENetBenefit_A_year1 * EE Tier X Threshold) * 1/3) + ((EENetBenefit_A_year2 * EE Tier X Threshold) * 1/3))

EECosts_A_year3 = (EEProgram_A_year3 + ((EENetBenefit_A_year1 * EE Tier X Threshold) * 1/3) + ((EENetBenefit_A_year2 * EE Tier X Threshold) * 1/3) + ((EENetBenefit_A_year3 * EE Tier X Threshold) * 1/3))

EECosts_A_year4 = (EEProgram_P_year4 + ((EENetBenefit_A_year2 * EE Tier X Threshold) * 1/3) + ((EENetBenefit_A_year3 * EE Tier X Threshold) * 1/3) + ((EENetBenefit_A_year4 * EE Tier X Threshold) * 1/3))

And continuing for Year 5 and following.

EEProgram_A = Actual annual cost for the DSM Portfolio energy efficiency programs.

EENetBenefit_A = For a program year, the EEAvoidedCost_A less the EEProgram_A cost. The Company's share of the EENetBenefit_A will be collected 1/3 per year over a three year period.

EEAvoidedCost_A = The net present value of the cost of supplying power (both energy and demand cost associated with generation, transmission, and distribution) that the Company would have incurred without the EEProgram_A.

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DEMAND SIDE MANAGEMENT RIDER

Schedule DSM

(continued)

EE Energy Savings Target_A=Actual kWh savings from the DSM Portfolio energy efficiency programs calculated by the Company for purposes of the annual true-up reconciliation and verified by the EM&V Process.

DRCosts_A = DRProgram_A + (DRNetBenefit_A * DR Tier X Threshold)

DRProgram_A = Actual annual cost for the DSM Portfolio demand response programs.

DRNetBenefit_A = For a program year, the DRAvoidedCost_A less the DRProgram_A cost.

DRAvoidedCost_A = The net present value of the cost of supplying power (both energy and demand cost associated with generation, transmission, and distribution) that the Company would have incurred without the DRProgram_A.

DR Energy Savings Target_A=Actual kW savings from the DSM Portfolio demand response programs calculated by the Company for purposes of the annual true-up reconciliation and verified by the EM&V Process.

Tier X Threshold = The percent of savings achieved, compared to the applicable EE or DR Energy Savings Targets.

Education_A = Actual annual cost for educational programs.

Research_A = Actual annual cost for the consumer market research program.

True_{PRIOR} = Remaining true-up amounts from previous DSM years (positive or negative).

NOTES TO THE TARIFF:

1. On or before December 20th prior to each DSM year, the Company will submit a report containing the projected DSM factors for each customer class on a \$/kWh basis for the coming DSM year. Such report will set the DSM factors for the DSM year. The Company will publish such projected DSM factors, and any updates to such DSM factors to customers.
2. On or before June 20th of each DSM year, the Company will submit a report containing updated projected DSM factors for the remaining DSM year. If the projected factors vary more than 10 percent, such updated projected DSM factors will set the DSM factors for the remainder of the DSM year. Such report shall also compare the original DSM revenue projections and the then-current DSM year-end projections.

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DEMAND SIDE MANAGEMENT RIDER

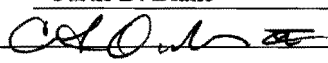
Schedule DSM

(continued)

NOTES TO THE TARIFF:

3. On or before April 1st each year beginning April 1st following the first complete DSM calendar year, the Company will file an application that provides the true-up reconciliation for the preceding DSM year plus any partial year, otherwise known as the Demand Side Management Actual Cost Adjustment ("DSM-ACA"). Such reconciliation amount, if any, for a given DSM year will be applied as an adjustment to the monthly DSM factors for the 12-month period beginning July following the reconciled DSM year. The Commission may make such DSM-ACA subject to correction in whole or in part, pending final determination on the application. All revenues collected pursuant to the DSM tariff shall be deemed to be revenues subject to adjustment until the DSM-ACA review is complete, the Commission has issued a final order in the DSM-ACA matter, and all terms and conditions of such order are satisfied. The Commission shall make a final determination on the adjustment, including the reasonableness and prudence of the actual DSM costs incurred during the DSM year, within two hundred forty (240) days of the filing of the application. Prudent operation of the Company's Demand Side Management Program will be consistent with industry standards as such is necessary to minimize the impact of this DSM tariff on customer rates.
4. The monthly DSM factor will be expressed in dollars per kilowatt-hour rounded to five decimal places.
5. Each DSM year will be a calendar year. There will be an interim period for the months between the approval of this DSM tariff and the start of the first complete calendar year. The months included in the interim period will be included with the first full calendar year for purposes of the true-up filing.
6. The references to Accounts within the DSM tariff are as defined in the FERC uniform system of accounts.
7. Retail Customers are customers that receive service under one of the Company's Retail tariffs.
8. This tariff is subject to the Company's Rules and Regulations as approved by the State Corporation Commission of Kansas.
9. This tariff is subject to all applicable Kansas statutes and regulations regarding the filing and investigation of complaints on unreasonable, unfair or unjust rates.

Issued:	_____ Month	_____ Day	_____ Year
Effective:	_____ Month	_____ Day	_____ Year
By:	Curtis D. Blanc	Sr. Director	_____ Title



FILED
THE STATE CORPORATION COMMISSION OF KANSAS
By: _____ Secretary



Kansas City Power & Light Company
2010 DSM Portfolio Filing

Docket No.: 10-KCPE- 795 -TAR
 Date: June 11, 2010

**CONFIDENTIAL
 INFORMATION**

The following information is provided to the Kansas Corporation Commission under
 CONFIDENTIAL SEAL:

Page	Line	Reason for Confidentiality from List Below
<u>Bryant:</u> 8	8	1
<u>Dennis:</u> 9	11	1
9	22	1
10	19	1
11	9	1
12	12	1
12	15	1
20	4	1
20	5	1
Schedule ADD-2 DSM Budgets	all	1,5
Schedule ADD-3 Quarterly CEP Report	all	1,5
Schedule ADD-4 BOC Appendix A: 6	section 4 table	1
7	section 5 table	1,5
Schedule ADD-5 C_I Rebates Appendix A: 3	section 2 table	1,5
7	section 4 table	1
7	section 5 table	1,5
8-9	section 6 table	1,5
Schedule ADD-6 CMResearch Program Appendix A: 2	section 4 line 2	1
2	section 4 table	1
Schedule ADD-7 Cool Homes Appendix A: 2	section 2 table	1,5
3	section 3B line 4	5



Page	Line	Reason for Confidentiality from List Below
8	section 4 table	1
8	section 5 table	1,5
9-10	section 6 table	1,5
Schedule ADD-8 Energy Analyzers Appendix A:		
2	section 4 table	1
3	section 4 table	1
3	section 5 table	1,5
Schedule ADD-9 EnergySaverLoanProg Appendix A:		
1-2	section 2 table	1,5
7	section 4 table	1
7	section 5 table	1,5
8-9	section 6 table	1,5
Schedule ADD-10 Energy Optimizer Appendix A:		
2	section 2 row 1	5
2	section 2 row 2	5
2	section 2 row 3	5
2	section 2 row 4	5
2	section 2 table	1,5
4	section 4 table	1
4	section 5 table	1,5
5-6	section 6 table	1,5
Schedule ADD-11 Energy Star® NH Appendix A:		
2	section 2 table	1,5
8	section 4 table	1
9	section 5 table	1,5
10-11	section 6 table	1,5
Schedule ADD-12 Low Inc Weather Appendix A:		
2	section 2 table	1,5
4	section 4 table	1
5	section 5 table	1,5
6-7	section 6 table	1,5
Schedule ADD-13 MPower Appendix A:		
1	section 2 row 1	5
1	section 2 table	1,5
1	section 2 row 5	1,5
3	section 4 table	1
4	section 5 row 1	5
4	section 5 row 2	5
4	section 5 table	1,5
5-6	section 6 table	1,5
Schedule ADD-14 MPower EMV	all	4,5
Schedule ADD-15 Optimizer EMV 2007	all	4,5



Page	Line	Reason for Confidentiality from List Below
Schedule ADD-16 Optimizer EMV 2008	all	4,5
Schedule ADD-17 Rebates EMV	all	4,5
Schedule ADD-18 BOC EMV	all	4,5
Schedule ADD-19 Cool Homes EMV	all	4,5
Schedule ADD-20 LIWX EMV	all	4,5
Schedule ADD-21 ANH EMV	all	4,5
<u>Giles:</u>		
10	8	1
10	15	1
10	18	1
<u>O'Donnell:</u>		
15	5	1,5
15	Table 1	1,5
16	2	1,5
Schedule JMO-6	all	4
Schedule JMO-8	all	1,5

Rationale for the “confidential” designation is documented below:

- “1” Confidential financial information/ budget projections.
- “2” Contract terms or specifics, or contract information that could be used by existing or future vendors to the disadvantage of KCP&L.
- “3” Sensitive information that could impact pending or threatened litigation.
- “4” Reports, work papers or other documentation related to work produced by internal or external auditors or consultants..
- “5” Trade Secret or Commercially Sensitive.
- “6” Other (specify) _____.

Should any party challenge KCP&L’s assertion of confidentiality with respect to the above information, KCP&L reserves the right to supplement the rationale contained herein with additional factual or legal information.



LAW DEPARTMENT

William G. Riggins
(816) 556-2645 ☎
(816) 556-2787 (Facsimile)
Bill.Riggins@KCP&L.com

June 11, 2010

BY HAND DELIVERY

Susan Duffy
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604

STATE CORPORATION COMMISSION

JUN 11 2010

Re: In the Matter of the Application of Kansas City Power & Light Company for Approval to Implement a Portfolio of Demand Side Management Programs Including Affordability, Energy Efficiency, Demand Response and Educational Programs, and to Implement a Rider for Recovery of Program Costs and Incentives Associated with this Portfolio

Dear Ms. Duffy:

Please accept for filing the original and seven (7) copies of Kansas City Power & Light Company's Application and supporting schedules in the above referenced matter.

Certain information contained within the enclosed materials has been designated by KCP&L as "confidential." KCP&L requests that the Commission maintain the confidential status of such designated materials in accordance with K.S.A. 66-1220a, K.S.A. 66-1233 and K.A.R. 82-1-221a. The information designated as confidential falls into three broad categories: (i) highly sensitive financial information and budget projections; (ii) highly sensitive, forward-looking information concerning KCP&L's strategic plans; (iii) sensitive information in reports from outside consultants. The public disclosure of such information would adversely impact the financial interests of KCP&L. A separate public version of the Application with the confidential information redacted is enclosed.

Please file-stamp the extra copy of the Application included for that purpose, then return it to the courier. Thank you for your assistance and attention to this matter.

Respectfully submitted,

William G. Riggins

Enclosure