THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application of Westar Energy, Inc. and Kansas Gas and Electric Company for Approval of Interim Budgets for Energy Efficiency Programs.

Docket No. 15-WSEE-532-MIS

CURB's Response to Staff's Report and Recommendation; Motion for Order

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The Citizens' Utility Ratepayer Board (CURB) files its response below to the *Notice of Filing* of Staff's Report and Recommendation; Motion for Order of the Staff of the Kansas Corporation Commission (Staff), which was filed in the above-captioned docket on September 2, 2015:

1. Staff recommends that the Commission approve Westar Energy, Inc. and Kansas Gas and Electric Company's (Westar Energy) application upon the following conditions.

- a. Before the Commission grants interim approval, Westar should be required to submit detailed budgets that comply with the guidelines established in the 08-441 Docket.
- Westar should be reminded that the Commission will determine whether the five-year budgets should be approved on a non-interim basis following EM&V evaluations.
- c. Westar should be required to file for re-approval of its BOC Program and file its detailed budget for approval.
- d. Westar should be required to submit a detailed budget for approval of the SimpleSavings Program.

- e. The term of the SimpleSavings Program, upon approval, should be extended to January 2027. The Program should also be frozen meaning no new loans should be provided.
- f. Westar should be required to request approval of the EE education programs budget.

2. CURB has analyzed Westar Energy's application as well as Staff's *Report and Recommendation* and agrees with Staff's conclusions and recommendations concerning the filing.

Therefore, CURB recommends that the Commission approve Staff's recommendation of Westar Energy's Interim Budgets for Energy Efficiency Programs proposed by Staff in its *Report* and *Recommendation*.

Respectfully submitted,

David Springe #15619 Niki Christopher #19311 Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 (785) 271-3200 (785) 271-3116 Fax

VERIFICATION

STATE OF KANSAS)) ss: COUNTY OF SHAWNEE)

I, Niki Christopher, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.

Niki Christopher

SUBSCRIBED AND SWORN to before me this 2nd day of September, 2015.

Notary Public

My Commission expires: <u>01-26-2017</u>.

A DELLA J. SMITH Notary Public - State of Kansas My Appt. Expires January 28, 2017

CERTIFICATE OF SERVICE

15-WSEE-532-MIS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 2^{nd} day of September, 2015, to the following:

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