

BEFORE THE KANSAS CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Kansas
City Power and Light Company for Approval
of its Demand-Side Management Portfolio Docket No.: 16-KCPE-446-TAR
Pursuant to the Kansas Energy Efficiency
Investment Act ("KEEIA"), K.S.A. 66-1283

MOTION OF NATIONAL HOUSING TRUST TO FILE TESTIMONY IN SUPPORT OF
NON-UNANIMOUS STIPULATION AND AGREEMENT

Intervenor National Housing Trust hereby moves for an Order allowing it to file the
attached testimony in support of the Non-unanimous Stipulation and Agreement herein.

In support of this motion the following is stated:

1. The attached testimony was originally intended to be attached to the
motion filed by National Housing Trust (NHT) on August 31, 2016.
However it was inadvertently not attached to the motion.
2. The fact of the omitted testimony was brought to undersigned
attention on February 23, 2017.
3. The omission of the testimony from the August 31, 2017, filing was not
intended to be prejudicial or otherwise burden the process herein.

WHEREFORE, Intervenor respectfully moves this Commission for an order
allowing the filing of the attached testimony.

Respectfully submitted,

R. Eye

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VERIFICATION

STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

Robert V. Eye, of lawful age, being first duly sworn upon oath, deposes and states: That he is an attorney for the National Housing Trust, that he has read the above and foregoing and that the statements therein contained are true and correct according to his knowledge, information and belief.

R. Eye

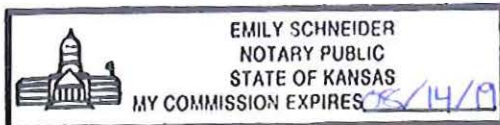
Robert V. Eye

Subscribed and sworn to before me this 23rd day of February, 2017.

My appointment expires: _____

Emily Schneider

Notary Public



CERTIFICATE OF SERVICE

Undersigned hereby certifies that on February 23, 2017, the above and foregoing motion of National Housing Trust to file testimony in support of non-unanimous stipulation and agreement, was emailed to the following:

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Robert V. Eye

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

In the Matter of the Application of Kansas City)	
Power & Light Company For Approval of Its Demand-)	
Side Management Portfolio Pursuant to the Kansas)	Docket No.: 16-KCPL-446-TAR
Energy Efficiency Investment Act ("KEEIA"), K.S.A.)	
66-1283.)	

TESTIMONY OF ANNIKA BRINK ON BEHALF OF THE NATIONAL HOUSING TRUST IN
SUPPORT OF THE NON-UNANIMOUS STIPULATION AND AGREEMENT
AUGUST 31, 2016

1 **Q.** Please state your name and affiliation.

2 **A.** Annika Brink, National Housing Trust (NHT).

3 **Q.** Are you the same Annika Brink who filed direct testimony in this Docket on August 8,
4 2016?

5 **A.** Yes.

6 **Q.** What is the National Housing Trust's position on the Non-Unanimous Stipulation and
7 Agreement filed with the Commission on August 30, 2016?

8 **A.** The National Housing Trust fully supports the Non-Unanimous Stipulation and Agreement filed
9 with the Commission on August 30, 2016.

10 **Q.** Why does the National Housing Trust support the Non-Unanimous Stipulation and
11 Agreement?

12 **A.** The National Housing Trust supports the Non-Unanimous Stipulation and Agreement because we
13 believe it is in the best interest of low-income multifamily households in KCP&L's (the Company)
14 service territory. It successfully resolves two key issues related to the Income-Eligible Multi-family
15 (IEMF) program that were raised in NHT's direct testimony: the convenience and reasonability of
16 program eligibility guidelines and the program size. We also are pleased to see other provisions in the
17 stipulation, including an agreement to provide aggregated electricity usage data to the owners of large
18 multifamily buildings.

1 **Q. Does the National Housing Trust have contested issues that are unresolved at this time?**

2 **A. The National Housing Trust's contested issues have either already been resolved by Kim**
3 Winslow's testimony on behalf of the Company, or they would be resolved were the Non-Unanimous
4 Stipulation and Agreement to be approved.

5 Kim Winslow's testimony on behalf of the Company clarified several Income-Eligible
6 Multifamily (IEMF) program design points raised in NHT's original testimony. Specifically, Ms.
7 Winslow clarified that the Company's IEMF program design for its Kansas City territory would
8 implement several key best practices NHT recommended and would mirror the IEMF program design that
9 is already in place in the Company's Missouri territories. These include (1) that the Company will provide
10 free energy audits, (2) that the Company is committed to an integrated one-stop shop concept, and (3) that
11 the Company would gladly work with the Kansas Housing Resources Corporation.¹ After reading Ms.
12 Winslow's testimony, NHT feels that these three points have been successfully clarified and resolved by
13 the Company.

14 **Q. Did Ms. Winslow's testimony sufficiently address the concerns you have with the eligibility**
15 **guidelines set for the Income-Eligible Multi-family program?**

16 **A. No. Ms. Winslow's testimony could not sufficiently address the recommendations NHT made**
17 about improving the convenience and reasonability of program eligibility guidelines, because these
18 recommendations require tariff modifications rather than mere clarification. Ms. Winslow expressed the
19 Company's openness to modifying eligibility guidelines in the Company's tariffs in order to (4) better
20 serve properties already documenting the low-income status of their residents via HUD guidelines, as
21 well as (5) better serve mixed-income properties.²

22 The two contested issues NHT raised around program eligibility are thus unresolved, but would
23 be successfully resolved by approval of the Non-Unanimous Stipulation and Agreement.

¹ These are listed as contested issues 1, 2, and 3, respectively, in NHT's contested issues list, submitted to the Commission on August 31, 2016. p. 1

² These are listed as contested issues 4 and 5, respectively, in NHT's contested issues list, submitted to the Commission on August 31, 2016. p. 1

1 Q. Did Ms. Winslow's testimony sufficiently address the concerns NHT raised regarding the
2 size of the Income-Eligible Multi-family program?

3 A. No. However, NHT's recommendation to (6) increase program size and budget in years two and
4 three are successfully addressed by the Non-Unanimous Stipulation and Agreement.³

5 Q. Please summarize your recommendations.

6 A. We urge the Commission to approve the Non-Unanimous Stipulation and Agreement of which
7 the National Housing Trust is a signatory, and which was submitted to the Commission on August 30,
8 2016.

9 Q. Does this conclude your testimony?

10 A. Yes.

³ This is listed as contested issues 6 in NHT's contested issues list, submitted to the Commission on August 31, 2016. pp.1-2

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Pursuant to the Kansas Energy Efficiency)
Investment Act ("KEEIA"), K.S.A. 66-1283)

AFFIDAVIT OF ANNIKA BRINK

CITY OF WASHINGTON,
DISTRICT OF COLUMBIA

Annika Brink, being first duly sworn on her oath, states:

1. My name is Annika Brink. I work in the City of Washington, District of Columbia and I am employed by The National Housing Trust as Energy Efficiency Advisor.
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of The National Housing Trust, which has been prepared in written form for introduction into evidence in the above-referenced docket before the Kansas Corporation Commission.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.

/s/ Annika Brink
Annika Brink

District of Columbia: JJ

Subscribed and sworn to me this 31st day of August, 2016

Joshua Zinman
Notary Public



My commission expires: January 31, 2020

JOSHUA ZINMAN
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires January 31, 2020

