



February 3, 2015

VIA ELECTRONIC TRANSMISSION

Ms. Neysa Thomas
Executive Director
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604

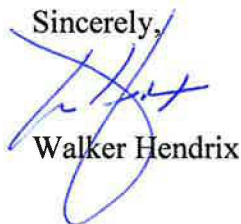
Re: Docket No. 15-WSEE-181-TAR

Dear Ms. Thomas:

Attached herewith for filing with the Commission is the *Motion to Intervene of Kansas Gas Service, a Division of ONE Gas* in the above-entitled and numbered docket.

Thank you for your assistance.

Sincerely,



Walker Hendrix

WH/sef

BEFORE 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) Docket No. 15-WSEE-181-TAR
Of Energy Efficiency Programs)

PETITION FOR INTERVENTION

COMES NOW Kansas Gas Service, a division of ONE Gas, Inc. (Kansas Gas Service), and states as follows:

1. Kansas Gas Service is a natural gas public utility operating in the state of Kansas pursuant to certificates of convenience and necessity issued by the Commission. Its principal place of business in the state of Kansas is located at 7421 West 129th Street, Overland Park.
2. Kansas Gas Service is a customer of Westar Energy, Inc. (“Westar”) and purchases electricity at several locations.
3. In this docket, Westar proposed several energy efficiency programs – a Small Business Lighting (SBL) program, a Home Energy Analysis (HEA) program and a Targeted Energy Efficiency (Targeted EE) program.
4. These programs are fairly broadly defined. The SBL program is defined as a lighting program, but the program design may be construed to be much broader. The program is being offered in conjunction with a new energy dashboard that is designed to provide energy usage information and benchmarking as well as energy saving tips. The program centers around a free energy assessment by a Westar advisor. The energy assessment will provide upgrade recommendations. A \$500 credit is then made available to the small commercial customer for the purpose of installing free energy efficiency measures. If the small commercial customer desires to install additional measures over and above the free \$500.00 amount, then the customer

may arrange installation by paying 40% out of the full cost of the energy efficiency measure. A deferred payment option is offered on the customer's contribution, which permits payment over time without incurring interest expenses. The costs of SBL program together with any computed revenue losses would be recovered as a surcharge to all retail customers in the Westar Energy Efficiency Rider.

5. The SBL program does not limit the range of energy efficiency measures that can be initiated. The testimony appears to indicate that it would apply to HVAC upgrades, including heat pumps, and to water heating devices. These measures can then be initiated in such a way to encourage a customer to switch from a natural gas burning appliance to an electric device. To the extent the program embraces those objectives, the program would be load building and would result in higher natural gas rates as load is converted from natural gas to electricity. There are no prohibitions set forth in the program description to prevent it from being used as a measure to encourage fuel switching. No analysis was performed to show that the fuel switching aspects of the program would be cost effective from a source-to-site perspective. Additionally, Westar admits without the incentives it proposes, the small commercial customers it has targeted would not implement the energy efficiency measures it is now proposing.

5. As an alternative energy provider, Kansas Gas Service has an interest in knowing the impact of the programs on customers who may switch fuel uses from natural gas to electricity. As a customer and a provider, it has an interest in knowing how the cost of the programs will impact electric and natural gas rates. Kansas Gas Service also has an interest in how the Commission sets energy efficiency policy on a case-by-case basis to permit cost recovery and incentive payments as well as the methodologies that may be adopted for the approval of energy

efficiency programs. Consequently, Kansas Gas Service has a substantial interest in these proceedings.

6. Kansas Gas Service's legal rights, duties, privileges, immunities, or other legal interests will be substantially affected by this proceeding. Its revenues would be affected by the fuel switching aspects of the program, the incentives would give Westar a competitive advantage over Kansas Gas Service and electric rates would be increased for Kansas Gas Service as a concomitant aspect of the program.

7. No party other than Kansas Gas Service can adequately and efficiently represent its interests in this proceeding.

8. Granting intervention to Kansas Gas Service in this Docket is in the interest of justice and will not impair the orderly and prompt conduct of the proceedings in this matter.

WHEREFORE, Kansas Gas Service, a division of ONE Gas, Inc., respectfully requests that it be granted intervention in this Docket, and that as an intervener, Kansas Gas Service be granted full rights of participation in this Docket, including but not limited to, the right to conduct relevant discovery related to the issues pending in this Docket, the right to present and sponsor witnesses and evidence, the right to cross-examine witnesses, the right to file briefs and pleadings, and the right to offer oral argument and participate in hearings.

Respectfully submitted by
Kansas Gas Service, a
division of ONE Gas, Inc.

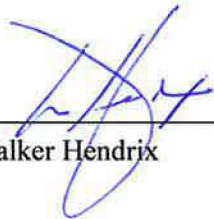


Walker Hendrix #08835
whendrix@onegas.com
John P. DeCoursey #11050
jdecoursey@onegas.com
7421 W. 129th Street
Overland Park, KS 66213
(913) 319-8620
(913) 319-8622 Fax

VERIFICATION

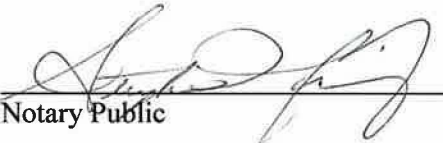
STATE OF KANSAS)
) ss
COUNTY OF JOHNSON)

Walker Hendrix of lawful age, being first duly sworn upon oath, deposes and states:
That he is an attorney for Kansas Gas Service, a division of ONE Gas, Inc.; that he has read the above and foregoing *Petition to Intervene* and that the statements therein contained are true according to his knowledge, information and belief.



Walker Hendrix

Subscribed and sworn before me this 3rd day of February 2015.



Notary Public

My Appointment Expires: 06/05/18



CERTIFICATE OF SERVICE

I Hereby Certify that on this 3rd day of February, 2015, a true and correct copy of the above and foregoing *Petition to Intervene* was deposited in the United States mail, first-class postage prepaid, or sent by e-mail transmission, properly addressed to:

ANDREW J ZELLERS, GEN COUNSEL/VP REGULATORY AFFAIRS
BRIGHTERGY, LLC
1617 MAIN ST 3RD FLR
KANSAS CITY, MO 64108
andy.zellers@brightergy.com

NIKI CHRISTOPHER, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
n.christopher@curb.kansas.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.smith@curb.kansas.gov

SHONDA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
sd.smith@curb.kansas.gov

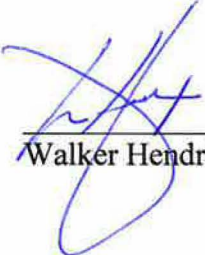
DAVID SPRINGE, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.springe@curb.kansas.gov

SAMUEL FEATHER, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
s.feather@kcc.ks.gov

AMBER SMITH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
a.smith@kcc.ks.gov

JAY VAN BLARICUM, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
j.vanblaricum@kcc.ks.gov

CATHRYN J. DINGES, CORPORATE COUNSEL
WESTAR ENERGY, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
Cathy.Dinges@westarenergy.com



Walker Hendrix