

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

In the Matter of the Application of Southern)
Pioneer Electric Company for Approval of the) Docket No. 15-SPEE-357-TAR
Demand Response Peak Time Rebate Pilot)
Program.)

CURB's Response to Staff's Report and Recommendation

The Citizen's Utility Ratepayer Board ("CURB") submits its comments below on Southern Pioneer Electric Company's application, and the Staff of the Kansas Corporation Commission's Report and Recommendation which was filed in the above-captioned docket on June 10, 2015.

On February 16, 2015, Southern Pioneer Electric Company ("Southern Pioneer") filed an application seeking Commission approval of a voluntary Peak Time Rebate ("PTR") Pilot Program. The proposed PTR Pilot Program would provide compensation to participants who are able to reduce overall kWh consumption during called events. The program will be offered in partnership with Mid-Kansas Electric Company (MKEC), Southern Pioneer's wholesale power supplier.

On June 10, 2015, Staff recommended the Commission approve Southern Pioneer's proposed PTR Pilot Program, based upon the favorability of the benefit-cost tests and other factors. While CURB does not agree with Staff's assessment of the costs and benefits, CURB does agree with Staff that the evidence indicates that this program has potential for reducing demand during peak at a reasonable cost. CURB also agrees with Staff that the program also has potential for providing useful information to the Commission. To that end, CURB recommends

that the Commission require MKEC and Southern Pioneer to file a report in this docket detailing the results of the program pilot after its conclusion. This report should include, at minimum:

- (1) the Measurement and Verification (M&V) completed by Power Systems Engineering;
- (2) a breakdown of all actual costs associated with the program, including program administrative fees, rebates provided, mailing and communication expenses, internal labor costs, and any other costs related to the program incurred by Southern Pioneer and MKEC;
- (3) a detailed description of the number of program participants for each of MKEC's participating utilities;
- (4) the actual costs of the program incurred by MKEC and the amounts passed on to each of MKEC's participating utilities through the energy cost adjustment;
- (5) a report summarizing the results of the end-of-pilot survey provided by the participants in the program; and
- (6) a post-pilot benefit-cost analysis.

CURB recommends that the Commission set a reasonable deadline for this filing and keep the docket open for any further action that the Commission deems appropriate.

Respectfully submitted,

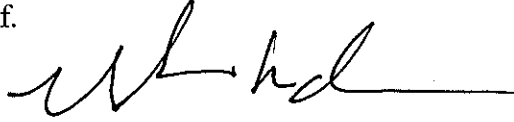


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VERIFICATION

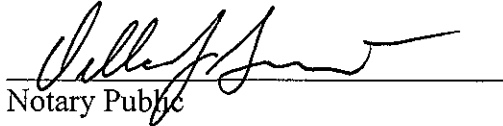
STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

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.



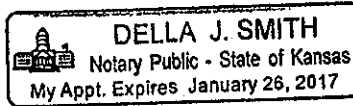
Niki Christopher

SUBSCRIBED AND SWORN to before me this 12th day of June, 2015.



Notary Public

My Commission expires: 01-26-2017.



CERTIFICATE OF SERVICE

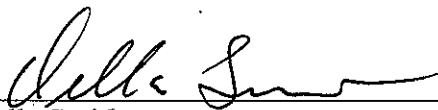
15-SPEE-357-TAR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 12th day of June, 2015, to the following:

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