

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Westar)
Energy, Inc. and Kansas Gas and Electric) Docket No. 15-WSEE-532-MIS
Company for Approval of Interim Budgets)
for Energy Efficiency Programs.)

**CURB's Response to Westar Energy, Inc. and Kansas Gas and Electric Company's
Motion For Approval of Energy Efficiency Budgets**

The Citizens' Utility Ratepayer Board (CURB) files its response below to the *Motion For Approval of Energy Efficiency Budgets* of Westar Energy, Inc.'s and Kansas Gas and Electric Company (Westar), which was filed in the above-captioned docket on October 15, 2015:

1. CURB recommends the Commission deny Westar's *Motion For Approval of Energy Efficiency Budgets* as presented.
2. Westar's *Motion* requests approval of five-year budgets for four energy-efficiency programs. Westar's *Motion* fails to identify what portion, if any, of the five-year energy-efficiency program budgets should be considered interim. In its *Order on Operating Budgets and EM&V Studies* in Docket No. 15-WSEE-021-TAR, the Commission found that "(f)or programs offered during an evaluation process, Westar shall petition for approval of interim program budgets during the pendency of the evaluation."¹
3. Two of Westar's energy-efficiency programs – WattSaver and Energy Efficiency Demand Response – are undergoing Commission-ordered evaluations. According to Westar's *Motion*, 99% of the five-year, \$27,003,750 energy-efficiency budget is for the operation of the WattSaver and Energy Efficiency Demand Response programs.

¹ Docket No. 15-WSEE-021-TAR, January 6, 2015, *Order on Operating Budgets and EM&V Studies*, at Ordering Paragraph A.

4. Until the Commission-ordered evaluations for WattSaver and the Energy Efficiency Demand Response programs are complete, and the Commission has time to determine whether the programs should be continued and the appropriate budget level for each program, it is premature to approve five-year budgets as requested in Westar's *Motion*.

5. Therefore, CURB recommends that the Commission deny Westar's *Motion For Approval of Energy Efficiency Budget*.

Respectfully submitted,

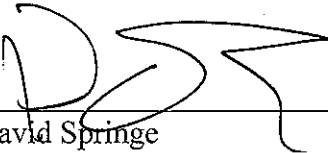


David Springe #15619
Niki Christopher #19311
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
(785) 271-3200
(785) 271-3116 Fax

VERIFICATION

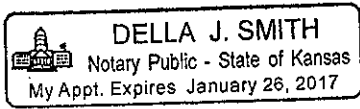
STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I, David Springe, 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.



David Springe

SUBSCRIBED AND SWORN to before me this 20th day of October, 2015.





Notary Public

My Commission expires: 01-26-2017.

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 20th day of October, 2015, to the following:

ANDREW FRENCH, LITIGATION ATTORNEY
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
a.french@kcc.ks.gov

MICHAEL NEELEY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
m.neeley@kcc.ks.gov

BRIAN G. FEDOTIN, DEPUTY GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
b.fedotin@kcc.ks.gov

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

JEFFREY L. MARTIN, VICE PRESIDENT, REGULATORY AFFAIRS
WESTAR ENERGY, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
jeff.martin@westarenergy.com



Della Smith
Administrative Specialist