

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) Docket No. 16-KCPE-446-TAR
The Kansas Energy Efficiency Investment Act)
("KEEIA"), K.S.A. 66-1283.)

**AMENDED TESTIMONY TO ADDRESS
CORRECTIONS AND SUPPLEMENTAL TESTIMONY
OF
STACEY HARDEN
ON BEHALF OF
THE CITIZENS' UTILITY RATEPAYER BOARD**

JANUARY 20, 2017

1 **Q. Please state your name and business address.**

2 A. My name is Stacey Harden and my business address is 1700 SW College Avenue,
3 Topeka, Kansas 66621.

4
5 **Q. Did you previously file testimony in this proceeding?**

6 A. Yes. I filed Direct and Cross-Answering Testimonies on behalf of the Citizens' Utility
7 Ratepayer Board ("CURB") on August 8, 2016 and August 15, 2016, respectively.

8
9 **Q. What is the purpose of your Amended Testimony?**

10 A. The purpose of my Amended Testimony is to respond to Kansas City Power & Light
11 Company's ("KCPL") corrections to its KEEIA report, filed in this docket on September
12 12, 2016, which included Supplemental Direct Testimony from Tim Nelson, and the
13 Supplemental Testimonies of KCPL witnesses Winslow, Ives, File, Nelson, Foltz and
14 Turner that were filed in this docket on December 15, 2016.

15
16 **Q. Please begin by summarizing the Corrections to KCPL's KEEIA Report filed on
17 September 12, 2016.**

18 A. In early September 2016, KCPL notified parties that it had discovered an error in its
19 KEEIA Cycle 1 2017-2019 Report ("Report"). KCPL indicated that it had used incorrect
20 kWh and kW savings for its proposed Home Energy Report program ("HER"). Further,
21 KCPL acknowledged that incorrect HER program savings were used in some portions of
22 the Report and the savings figures used in portions of the Report and Rebuttal
23 Testimonies reflected KCPL Missouri instead of KCPL Kansas. At the direction of the

1 Prehearing officer in the September 2, 2016, prehearing conference, KCPL filed
2 corrections to the report along with the supplemental testimony of Tim Nelson on
3 September 12, 2016.

4
5 **Q. What is the impact of KCPL’s use of incorrect kWh and kW savings in its
6 proposed HER program?**

7 A. The error impacted the projected kWh and kW savings that would be achieved if the
8 Commission approved the HER program. According to Mr. Nelson’s supplemental direct
9 testimony, using the correct kWh and kW savings for the HER program decreases the
10 program’s Ratepayer Impact Measure (“RIM”) score from 0.54 to 0.49, and the Total
11 Resource Cost (“TRC”) score from 1.78 to 1.34.¹

12 Additionally, because the HER program is part of KCPL’s KEEIA portfolio of
13 programs, the error had an impact on the reported total residential savings and total
14 portfolio savings, the estimated Throughput Disincentive and the Earnings Opportunity.
15 According to Mr. Nelson’s Supplemental Direct Testimony, the corrected HER kWh and
16 kW savings will decrease the total portfolio’s TRC score from 1.79 to 1.77. The total
17 portfolio’s RIM score remained unchanged at 0.88.²

18
19 **Q. After reviewing KCPL’s corrected KEEIA Cycle 1 2017-2019 Report, do you wish
20 to make any changes to the recommendations made in your direct or supplemental
21 testimonies filed on August 8 and August 15, 2016, respectively?**

22 A. No, I do not. My direct testimony recommended the Commission deny KCPL’s

¹ Supplemental Testimony of Timothy Nelson, September 12, 2016, at page 2.

² Supplemental Testimony of Timothy Nelson, September 12, 2016, at page 3.

1 application for several reasons, including the lack of cost-effectiveness of the total
2 portfolio of programs. The reported error does nothing to change my testimony that the
3 TRC and RIM values included in the original KEEIA Cycle 1 Report were overstated
4 because KCPL's estimate of avoided costs is inflated and KCPL's use of a Technical
5 Resource Manual overestimates the useful life and savings for energy-efficiency
6 measures.

7 KCPL's corrections to the Report show a decrease in its stated TRC test results,
8 further exacerbating the portfolio's overall lack of cost-effectiveness. As the stated goal
9 of KEEIA is to promote the implementation of cost-effective demand-side programs in
10 Kansas, and KCPL's portfolio of programs is not cost-effective, my recommendation
11 remains that the Commission deny KCPL's application.

12
13 **Q. Have you reviewed the Supplemental Testimonies filed on behalf of KCPL in this**
14 **docket on December 15, 2016?**

15 A. Yes, I have.

16
17 **Q. Do you have any comments to make regarding Supplemental Testimonies?**

18 A. No. The testimonies filed by Ms. Winslow, Mr. Foltz, Mr. Ives, Ms. Turner, Mr. Nelson,
19 and Mr. File on behalf of KCPL summarize KCPL's KEEIA Report and do not appear to
20 modify the Report or provide any new evidence or data supporting the Report. As such, I
21 have no responsive comments to the summarizations provided in the Supplemental
22 Testimonies.

23

1 **Q. Does this conclude your testimony?**

2 A. Yes.

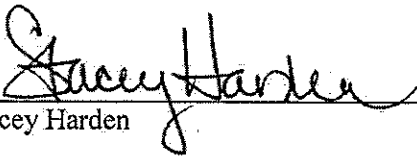
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VERIFICATION

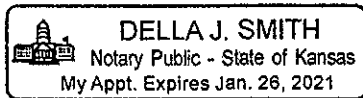
STATE OF KANSAS)
COUNTY OF SHAWNEE) ss:

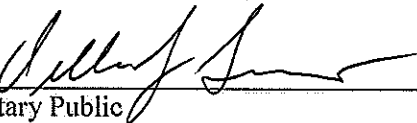
I, Stacey Harden, of lawful age and being first duly sworn upon my oath, state that I am a consultant for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge,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



Stacey Harden

SUBSCRIBED AND SWORN to before me this 20th day of January, 2017.


DELLA J. SMITH
Notary Public - State of Kansas
My Appt. Expires Jan. 26, 2021



Notary Public

My Commission expires: 01-26-2021.

CERTIFICATE OF SERVICE

16-KCPE-446-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 20th day of January, 2017, to the following parties:

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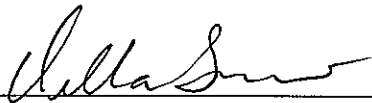
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