

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

In the Matter of the Application of Kansas)
City Power & Light Company for Approval)
To Extend its Demand-Side Management) Docket No. 18-KCPE-124-TAR
Programs)

**ADDENDUM TO APPLICATION OF
KANSAS CITY POWER & LIGHT COMPANY**

COMES NOW Kansas City Power & Light Company (“KCP&L” or the “Company”) and for its Addendum (“Addendum”) to its *Application for Approval to Extend Demand-Side Management Programs* (“Application”) filed to open this docket, states as follows:

I. BACKGROUND

1. On September 11, 2017, KCP&L filed its Application in this docket.
2. KCP&L wishes to supplement its Application with additional information and budget support for its low-income and educational programs.
3. In previous dockets the State Corporation Commission of the State of Kansas (“Commission”) indicated that a 5% level serves as a useful guideline for these programs and that utilities should submit justification for a higher budget level. Of the \$2.19 million five-year Demand-Side Management Program budget proposed in the Application, 10.8% of the budget is for low-income programs (Income Eligible Weatherization Program) and 28.7% is for educational programs (Online Energy Information and Analysis Programs; Building Operator Certification Program). Therefore, the proposed budget for these programs exceeds the aforementioned 5% level. This pleading explains why an exception should be made to allow for exceeding the 5% guideline in this particular instance.

II. BUDGET GUIDELINE EXCEPTION

4. The Commission should extend KCP&L's portfolio of programs and approve their budgets because the programs are in the public interest. In addition, exceeding the 5% guideline is not a result of program growth but because there are fewer non-educational and non-low income programs within the portfolio compared to other programs, such as demand response (MPower), which was phased out in 14-KCPE-042-TAR.

5. The programs met the 5% criteria when they were initially approved by the Commission and would have continued to meet the criteria had the overall portfolio presented in the 16-KCPE-446-TAR docket been approved.

6. The online education tools are shared by Kansas and Missouri customers and restricting Kansas customers' access would limit efficiencies that could be realized for both Kansas and Missouri customers.

7. The next sections detail the value of each of the educational and low-income programs that KCP&L is requesting an extension and budget approval for and why they are in the public interest.

III. INCOME-ELIGIBLE WEATHERIZATION PROGRAM

8. KCP&L began partnering with Kansas Housing Resources Corporation ("KHRC") in 2016 to deliver weatherization and other energy efficiency benefits to low-income Kansas customers through the federal Low-Income Weatherization Program ("LIWAP"). The Income-Eligible Weatherization program was unsuccessful for a number of years, but much progress has been made with KCP&L's partnership with KHRC. In 2016, KCP&L provided KHRC a modest budget of \$41,872. In less than 12 months, KHRC expended 100% of this budget and was able to provide benefits to 12 low-income families with KCP&L's support. In

2017, KCP&L provided KHRC the same funding amount per the tariff. Thus far, KHRC has expended 85% of this budget and is on track to reach 100% budget spent by calendar year end (2017).

9. KHRC's waitlist has continued to grow with KCP&L customers as consumer awareness and demand increases. To date, KHRC has more KCP&L customers on their waiting list than is currently available to assist through KCP&L funding. KCP&L expects this trend to only continue upward, therefore it is very important that if any change is made to the budget for this program, it is only done to increase funds, not decrease them.

IV. ONLINE ENERGY INFORMATION AND ANALYSIS PROGRAMS

10. The Home Energy Analyzer ("HEA") and the Business Energy Analyzer ("BEA") are online energy information and analysis educational programs that provide residential and small business customers, respectively, with access to a secure online portal on which to retrieve their billing information, make comparisons of electric usage on a monthly or yearly basis, analyze electric usage on an end-use basis, and research energy savings by end use through a searchable resource center. Customers can also compare their bills to analyze changes from one month to another, and can also compare their home to a similar one in terms of average energy usage.

11. KCP&L has been providing the HEA and BEA to Kansas customers since approximately 2006 through different implementer partnerships with Aclara and now Opower. Both of the online tools are offered to KCP&L's Missouri and Kansas customers. Because KCP&L Kansas customers' energy efficiency options are very limited, it is critical the Energy Analyzer tools are available for Kansas customers to provide them an opportunity to learn about how they are using energy and how to use it more efficiently. Customer demand and utilization

for this tool is very high in Kansas and tracks above industry average per Opower's comparison with other utility partners. Since mid-2015, there have been over 207,226 web logins to the tools from Kansas customers. Home Energy Audit completions have already increased by 35% from 2016 to 2017 with over 20,693 completions to date. In September 2017 alone, the "My Energy Use" page received nearly 12,000 views from Kansas customers. KCP&L expects demand and utilization of this tool to continue to increase in Kansas, especially as other efficiency options are limited.

V. BUILDING OPERATOR CERTIFICATION PROGRAM

12. The Building Operator Certification ("BOC") program is a competency-based training and certification program for operations and maintenance staff working in commercial, institutional, or industrial buildings. BOC achieves energy savings by training individuals directly responsible for the maintenance of energy-using building equipment and day-to-day building operations, thus enabling them to take energy savings actions in their buildings. The program provides an option of training for larger customers who would otherwise not have any other options within the KCP&L portfolio. The BOC program has been offered as an educational program to Kansas business customers circa 2007. During this time, there have been approximately 63 Kansas customers who have graduated from the program. The BOC offering rounds out opportunities for the mid to large size business segment, whereas the Business Energy Analyzer is designed for small business customers.

WHEREFORE, Kansas City Power & Light Company respectfully requests the Commission issue accept this Addendum as incorporated into the Application filed on September 11, 2017.

Respectfully submitted,

/s/ Roger W. Steiner

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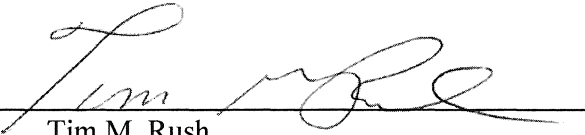
**ATTORNEYS FOR
KANSAS CITY POWER & LIGHT COMPANY**

VERIFICATION


STATE OF MISSOURI)
)
COUNTY OF JACKSON)

I, Tim M. Rush, being duly sworn, on oath state that I am Director, Regulatory Affairs of Kansas City Power & Light Company, that I have read the foregoing Motion and know the contents thereof, and that the facts set forth therein are true and correct to the best of my knowledge and belief.

KANSAS CITY POWER & LIGHT COMPANY

By: 
Tim M. Rush

The foregoing Application was subscribed and sworn to before me this 16th day of November, 2017.


Notary Public

My Commission Expires:

4/26/2021



CERTIFICATE OF SERVICE

I do hereby certify that on the 16th day of November 2017, I electronically filed via the Kansas Corporation Commission's Electronic Filing System, a true and correct copy of the above and foregoing with a copy emailed to counsel for all parties of record.

/s/ Roger W. Steiner

Counsel for Kansas City Power & Light Company