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Missouri Public
Service Commission

b. Should LIHEAP recipients be directed to the weatherization program and be required to participate in it?

LIHEAP is administered through the Missouri Department of Social Services. Therefore, that agency would be responsible for any changes in the current referral procedures. KCPL would support having the Department of Social Services and other providers modify their rules to improve referrals to weatherization. KCPL maintains, however, that such an initiative should be a statewide issue and is outside the purview of this rate case. See Nathan Surrebuttal Testimony at 9. KCPL believes that there are no longer any disputes concerning this issue.

c. Should KCPL participate in an "Energy Conservation Program" that will provide consultation, weatherization materials and installation?⁵ If so, should the cost of the program to be underwritten by KCPL and charged to the customer?

KCPL witness Sue Nathan responds to Mr. Bill Dias's request for the Commission to require KCPL to implement an "Energy Conservation Program" in her Surrebuttal Testimony at 4-5. Although the details of what Mr. Dias wants the Commission to require of KCPL are unclear, KCPL understands that he requests the Commission to compel KCPL to utilize a service he or his company is providing. The Commission should not require KCPL to participate in this kind of an "Energy Conservation Program." KCPL works collaboratively with other parties through the CPAG to consider and evaluate energy conservation and other customer programs. KCPL sees no merit in circumventing the CPAG process to give Mr. Dias and his company preferential treatment.

WHEREFORE, for the reasons stated herein, Kansas City Power & Light Company respectfully requests that the Commission order that adopts its recommendations in this case.

⁵ The Missouri Department of Natural Resources and the City of Kansas City object to the inclusion of this issue and assert that it is not properly before the Commission in this case.