

Exhibit No.: \_\_\_\_\_  
Issue: Energy Efficiency, Weatherization  
and Revenue Requirement  
Witness: Robert T. Jackson  
Sponsoring Party: City of Kansas City, Missouri  
Case No.: Case No. ER-2009-0090

CITY OF KANSAS CITY, MISSOURI

Case No. ER-2009-0090

REBUTTAL TESTIMONY

OF

ROBERT T. JACKSON

Kansas City, Missouri  
March 2009

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI


In the Matter of the Application of Aquila, Inc.            )  
d/b/a KCP&L Greater Missouri Operations            )     Case No. ER-2009-0090  
Company, for Approval to Make Certain            )  
Changes in its Charges for Electric Service.        )

AFFIDAVIT OF ROBERT T. JACKSON

STATE OF MISSOURI     )  
                                  ) ss.  
COUNTY OF COLE     )

I, Robert T. Jackson, of lawful age, and being duly sworn, do hereby depose and state:

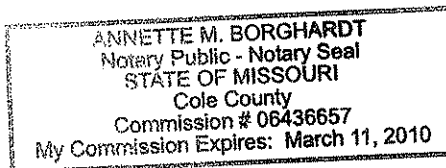
1. My name is Robert T. Jackson. I am presently Manager of the Property Preservation Division with the City of Kansas City, Missouri, intervener in the referenced matter.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my personal knowledge, information and belief.

  
\_\_\_\_\_  
Robert T. Jackson

Subscribed and sworn to before me, a Notary Public, this 11<sup>th</sup> day of March, 2009

My Commission expires:  
  
\_\_\_\_\_

  
\_\_\_\_\_  
Notary Public for Cole County, MO





1 U. S. Department of Energy as administered by the Missouri Department of Natural  
2 Resources (DNR). DNR also acts as the distributor of the available weatherization  
3 program grants. The City is a long time approved recipient of weatherization grants and  
4 federal funding for the program. The City's program is also supported by the Department  
5 of Housing and Urban Development and by City funded home repair programs. The  
6 City's participation with utilities in Platte, Clay and Jackson County, Missouri in  
7 providing weatherization assistance, and my own personal involvement in the program  
8 from its beginnings are subjects of my testimony filed in previous cases before the  
9 Commission including, GR-2006-0422, ER-2006-0314 and ER-2005-0436.

10  
11 Q. DOES THE CITY OPPOSE KCP&L-GMO's ADDITION OF THE SUPPLEMENTAL  
12 WEATHERIZATION AND MINOR HOME REPAIR PROGRAM TO ITS LIST OF  
13 ENERGY EFFICIENCY PROGRAMS?

14 A. No. Like DNR, the City very much supports this program for the reasons Ms. Wolfe has  
15 identified in her testimony. I consider this a step forward for the City/KCP&L-GMO  
16 partnership but I want to take this opportunity to repeat a request for some minor  
17 adjustments that I believe will enhance the process.

18  
19 Q. WHAT ADJUSTMENTS TO THE WEATHERIZATION PROGRAM DO YOU  
20 SUGGEST?

21 A. Historically, and as an example, the City has been securing weatherization applicants to  
22 participate in the program and then refers those applicants to the affected utility, (such as  
23 KCPL) for approval based on the applicant's record of energy consumption. Following

1 those steps, KCPL must then return the approved applicant list to the City for further  
2 processing.

3

4 Q. IS THERE A WAY TO IMPROVE THIS PROCESS?

5 A. Given the broad concern about energy costs for low-income households, I would propose  
6 that with respect to KCP&L-GMO, the Company should have its call center refer  
7 applicants to the program through my office. This would be very appropriate for a  
8 particular class of applicant who would be eligible for low income weatherization  
9 assistance.

10

11 Annually, fuel assistance is made available through the Missouri Department of Social  
12 Services with the federal Low Income Home Energy Assistance Program funds  
13 (LIHEAP). The recipients of these funds must work directly with the utility that  
14 provides them service, and that would be the case with LIHEAP recipients who are also  
15 KCPL customers.

16

17 The LIHEAP recipients from the previous year are mailed a new application for the  
18 upcoming year. That application is sent about the time when the state receives its  
19 LIHEAP allocation. Largely the same recipients apply for and are granted the limited  
20 federal dollars which severely limits the number of “new” applicants who may participate  
21 in the program. If LIHEAP recipients were directed to the City/KCPL weatherization  
22 program the pressure on the LIHEAP program would reduce and furthermore, new  
23 applicants for those dollars could become recipients.

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I am confident that KCP&L-GMO's call center (which could very well be the same call center used for KCPL customers) visits with the same LIHEAP applicants on at least an annual basis, if not throughout the calendar year, and by means of that contact, KCP&L-GMO can be the coordinator in sending those customers for weatherization services through the City/KCP&L-GMO partnership. I believe there can be improved benefits to the ratepayer funded weatherization program by means of KCP&L-GMO referring its known customers that stand to benefit through the weatherization program. In the end, this effort allows KCP&L-GMO to better target weatherization funds.

I have suggested this improvement before. It can be found in my rebuttal testimony filed in Case No. ER-2006-0314.

**Q. HAS THIS MATTER BEEN CONSIDERED BY THE MISSOURI ENERGY TASK FORCE?**

**A. The Task Force is aware of the issue and in its report of August 13, 2006, recommends that**

[Department of Social Services] should modify its rules to require that individuals living in owner occupied dwellings who receive utility assistance shall be referred to the appropriate weatherization agency for weatherization of their residence, and that any individuals who refuses to participate, if services are available and offered, in the weatherization program after that referral shall be denied future utility assistance.

If this recommendation were accepted along with the added coordination of KCP&L-GMO's call center as I have outlined it in this testimony, it is my opinion that the benefits

1           of the weatherization program can be much better utilized.

2

3    Q.     DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

4    A.     Yes, it does.