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-2009-0089

CITY OF KANSAS CITY, MISSOURI

Case No. ER-2009-0089

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 Kansas City Power and Light Company for Approval to Make Certain Changes in its Charges for Electric Service to Continue the Implementation of its Regulatory Plan Case No. ER-2009-0089 Case No. ER-2009-0089
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 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 11th day of March, 2009
My Commission expires: My Commission expires: Notary Public for Cole County, MO
ANNETTE M. BORGHARDT Notary Public - Notary Seal STATE OF MISSOURI Cole County Commission # 06436657 My Commission Expires: March 11, 2010

REBUTTAL TESTIMONY OF ROBERT T. JACKSON 1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS. 2 A. My name is Robert T. Jackson. My business address is Department of Neighborhood and 3 Community Services, 4th Floor, City Hall, 414 East 12th Street, Kansas City, Missouri 4 64106. 5 6 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY? 7 A. I am employed by the City of Kansas City (the City) as Manager of the Property 8 Preservation Division of the Housing and Community Development Department 9 (formerly known as the Department of Neighborhood and Community Services). 10 11 WHAT IS THE PURPOSE OF YOUR TESTIMONY? Q. 12 I want to add my comments to observations made by Ms. Laura Wolfe in her direct A. 13 testimony filed on February 13, 2009 respecting Kansas City Power & Light's (KCPL) 14 addition of a Supplemental Weatherization and Minor Home Repair Program to the 15 Affordability, Energy Efficiency and Demand Response Programs (DRP) established in 16 the Company's Regulatory Plan approved in Case No. ER-2005-0329. 17 18

Q. WHAT IS THE CITY'S ROLE WITH RESPECT TO THE LOW INCOME
WEATHERIZATION PROGRAM (LIWAP)?

A. The City operates the program pursuant to technical assessment criteria established by the
U. S. Department of Energy as administered by the Missouri Department of Natural
Resources (DNR). DNR also acts as the distributor of the available weatherization

program grants. The City is a long time approved recipient of weatherization grants and federal funding for the program. The City's program is also supported by the Department of Housing and Urban Development and by City funded home repair programs. The City's participation with utilities in Platte, Clay and Jackson County, Missouri in providing weatherization assistance, and my own personal involvement in the program from its beginnings are subjects of my testimony filed in previous cases before the Commission including, GR-2006-0422, ER-2006-0314 and ER-2005-0436.

- Q. DOES THE CITY OPPOSE KCPL'S ADDITION OF THE SUPPLEMENTAL WEATHERIZATION AND MINOR HOME REPAIR PROGRAM TO THE DRP's
- 11 A. No. Like DNR, the City very much supports this program for the reasons Ms. Wolfe has
 12 identified in her testimony. I consider this a step forward for the City/KCPL partnership
 13 but I want to take this opportunity to repeat a request for some minor adjustments that I
 14 believe will enhance the process.

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

A. Historically, the City has been securing weatherization applicants to participate in the program and then refers those applicants to KCPL for approval based on the applicant's record of energy consumption. Following those steps, KCPL must then return the approved applicant list to the City for further processing.

Q. IS THERE A WAY TO IMPROVE THIS PROCESS?

A. Given the broad concern about energy costs for low-income households, I would propose that KCPL have its call center refer applicants to the program through my office. This would be very appropriate for a particular class of applicant who would be eligible for low income weatherization assistance.

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

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

I am confident that KCPL's call center visits with the same LIHEAP applicants on at least an annual basis, if not throughout the calendar year, and by means of that contact, KCPL can be the coordinator in sending those customers for weatherization services through the City/KCPL partnership. I believe there can be improved benefits to the

allows KCPL to better target weatherization funds. I have suggested this improvement before. It can be found in my rebuttal to in Case No. ER-2006-0314. RAS THIS MATTER BEEN CONSIDERED BY THE MISSOURI EN FORCE? A. The Task Force is aware of the issue and in its report of August 13, 2006 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	1		ratepayer funded weatherization program by means of KCPL referring its known
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25 A. Yes, it does.	24	Q.	DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?
	25	A.	Yes, it does.