

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

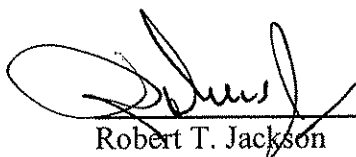
In the Matter of the Application of Kansas City)
Power and Light Company for Approval to Make)
Certain Changes in its Charges for Electric) Case No. ER-2009-0089
Service to Continue the Implementation of its)
Regulatory Plan)

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:

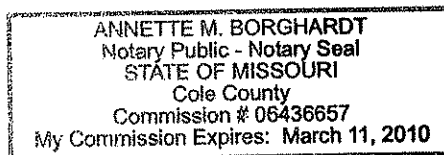
1. My name is Robert T. Jackson. I am presently Manager of Property Preservation Division with the City of Kansas City, Missouri, intervener in the referenced matter.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
3. I hereby swear and affirm that my answers contained 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


Notary Public for Cole County, MO

My Commission expires:



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

8
9 Q. DOES THE CITY OPPOSE KCPL'S ADDITION OF THE SUPPLEMENTAL
10 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.

15
16 Q. WHAT ADJUSTMENTS TO THE WEATHERIZATION PROGRAM DO YOU
17 SUGGEST?

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

22
23 Q. IS THERE A WAY TO IMPROVE THIS PROCESS?

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

5
6 Annually, fuel assistance is made available through the Missouri Department of Social
7 Services with the federal Low Income Home Energy Assistance Program funds
8 (LIHEAP). The recipients of these funds must work directly with the utility that
9 provides them service, and that would be the case with LIHEAP recipients who are also
10 KCPL customers.

11
12 The LIHEAP recipients from the previous year are mailed a new application for the
13 upcoming year. That application is sent about the time when the state receives its
14 LIHEAP allocation. Largely the same recipients apply for and are granted the limited
15 federal dollars which severely limits the number of “new” applicants who may participate
16 in the program. If LIHEAP recipients were directed to the City/KCPL weatherization
17 program the pressure on the LIHEAP program would reduce and furthermore, new
18 applicants for those dollars could become recipients.

19
20 I am confident that KCPL’s call center visits with the same LIHEAP applicants on at
21 least an annual basis, if not throughout the calendar year, and by means of that contact,
22 KCPL can be the coordinator in sending those customers for weatherization services
23 through the City/KCPL partnership. I believe there can be improved benefits to the

1 ratepayer funded weatherization program by means of KCPL referring its known
2 customers that stand to benefit through the weatherization program. In the end, this effort
3 allows KCPL to better target weatherization funds.

4
5 I have suggested this improvement before. It can be found in my rebuttal testimony filed
6 in Case No. ER-2006-0314.

7
8 Q. HAS THIS MATTER BEEN CONSIDERED BY THE MISSOURI ENERGY TASK
9 FORCE?

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

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

19
20 If this recommendation were accepted along with the added coordination of KCPL's call
21 center as I have outlined it in this testimony, it is my opinion that the benefits of the
22 weatherization program can be much better utilized.

23
24 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

25 A. Yes, it does.