

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of KCP&L Greater Missouri Operations     )  
Company’s Application for Approval of Modifications to    )     File No. EO-2014-\_\_\_\_  
Its Demand-Side Programs    )

**KCP&L GREATER MISSOURI OPERATIONS COMPANY’S APPLICATION FOR  
APPROVAL OF MODIFICATION TO ITS DEMAND-SIDE PROGRAMS AND  
MOTION FOR EXPEDITED TREATMENT**

COMES NOW KCP&L Greater Missouri Operations Company (“GMO” or “Company”), by and through counsel, pursuant to Section 393.1075, RSMo. Cum. Supp. 2010, 4 CSR 240-20.060, 4 CSR 240-2.080(14), 4 CSR 240-3.164 and 4 CSR 240-20.094, and files this Application for approval of Modification to Its Demand-Side Programs and Motion for Expedited Treatment. In support thereof, GMO respectfully states to the Missouri Public Service Commission (“Commission”):

1. GMO is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. GMO is primarily engaged in the business of providing electric and steam utility service in Missouri to the public in its certificated areas. GMO is an electrical corporation and public utility as defined in Section 386.020 (2000), as amended. *Id.* A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing the Company’s authority under the law to conduct business in the State of Missouri, was filed with the Commission in File No. EU-2002-1053 and is incorporated herein by reference in accordance with 4 CSR 240-2.060(1)(G). GMO’s fictitious name registration was filed in File No. EN-2009-0015 and is incorporated herein by reference.

2. GMO holds Certificates of Convenience and Necessity from the Commission to transact business as an electric public utility in certain areas of the State of Missouri and is principally engaged in the generation, transmission, distribution and sale of electric power and

energy. GMO has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or rates, which has occurred within three years of the date of this Application other than the following pending actions: *Ag Processing, Inc. a Cooperative v. KCP&L Greater Missouri Operations Company*, File No. HC-2012-0259; and, *R & S Home Builders, Inc. and Carol and Arvel Allman v. KCP&L Greater Missouri Operations Company*, File No. EC-2014-0343. In addition, no annual report or assessment fees are overdue.

3. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Tim Rush  
Director- Regulatory Affairs  
Kansas City Power & Light Company  
1200 Main Street, 19<sup>th</sup> Floor  
Kansas City, Missouri 64105  
Phone: (816) 556-2344  
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E-mail: [Tim.Rush@kcpl.com](mailto:Tim.Rush@kcpl.com)

4. Data requests concerning this Application should be addressed to [Regulatory.Affairs@kcpl.com](mailto:Regulatory.Affairs@kcpl.com).

### **Background**

5. On November 15, 2012, the Commission issued an Order in File No. EO-2012-0009 approving a Non-Unanimous Stipulation and Agreement that established GMO's three-year demand-side program plan and its demand-side investment mechanism.

6. On May 27, 2014 a Non-Unanimous Stipulation and Agreement was filed in File No. EO-2014-0095 ("0095 Stipulation") which provided, among other things, that GMO would modify its MEEIA programs and file a tariff to adopt the same residential lighting program as Kansas City Power & Light Company ("KCP&L"). GMO also agreed to modify the overall

MEEIA program savings targets to reflect the energy and demand savings from the residential lighting program.

### **Relief Requested**

7. By this Application, GMO seeks Commission authority to offer a residential lighting program and approval of a modification to GMO's current overall program targets to reflect new energy and demand savings from the residential lighting program. The Company is also requesting approval to utilize a specific net to gross value for certain end use measures within the residential lighting program.

8. In the Direct Testimony of Tim M. Rush, the Company describes the residential lighting program and the impact of the residential lighting program on the GMO MEEIA plan currently in place. The testimony explains the tariff changes needed to offer a residential lighting program. The testimony also lists and describes the requested variances from certain provisions of the MEEIA rules, as well as, GMO's compliance with the MEEIA filing requirements for this Application.

### **Motion for Expedited Treatment**

9. Simultaneous with this Application, tariffs have been filed with the Commission, that have an effective date of July 11, 2014. The Company requests a July 6, 2014 effective date so that the tariffs of both the KCP&L and GMO residential lighting programs will coincide and have the same effective date and the programs can be launched and marketed to the Company's Missouri customers simultaneously.

10. The Company filed its Application as soon as it could have after the approval of the 0095 Stipulation. There will be no negative effect on GMO's customers or the general public if the Commission approves this Application and the tariffs by July 6, 2014. The benefit

of approving the Application and tariffs by July 6, 2014 is that GMO and KCP&L will be able to coordinate their marketing strategy across its Missouri territories, which should enhance participation and eliminate customer confusion.

WHEREFORE, KCP&L Greater Missouri Operations Company requests that the Commission approve its residential lighting program and approve modifications to GMO's overall MEEIA savings targets as described in the testimony of Tim Rush, approve the tariffs filed in this case, grant the motion for expedited treatment and for such other and further relief as the Commission deems appropriate in the circumstances.

Respectfully submitted,

*/s/ Roger W. Steiner*

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Attorneys for KCP&L Greater Missouri Operations  
Company

## CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to all counsel of record in this case, File No. EO-2014-0095 and File No. EO-2012-0009 on this 11<sup>th</sup> day of June, 2014.

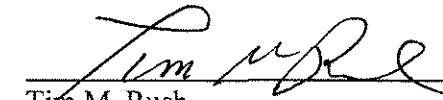
*/s/ Roger W. Steiner*

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Roger W. Steiner


VERIFICATION

STATE OF MISSOURI     )  
  )     SS.  
COUNTY OF JACKSON    )

I, Tim M. Rush, having been duly sworn upon my oath, state that I am Director of Regulatory Affairs of Kansas City Power & Light Company, that I am authorized to make this verification on behalf of KCP&L Greater Missouri Operations Company, and that the matters stated in the foregoing Application are true and correct to the best of my information, knowledge, and belief.

  
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Tim M. Rush  
Director, Regulatory Affairs

SUBSCRIBED AND SWORN TO before me this 1<sup>st</sup> day of June, 2014.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: Feb. 4, 2015

