

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

In the Matter of KCP&L Greater Missouri Operations)
Company’s Application to Discontinue Certain) Case No.
Demand-Side Management Programs.)

APPLICATION OF KCP&L GREATER MISSOURI OPERATIONS COMPANY

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 240-20.094(5) and 4 CSR 240-3.164(5), and files this Application to Discontinue Certain Demand-Side Management Programs. 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 Mo. Rev. Stat. § 386.020, Mo. Rev. Stat. (2000), as amended.¹ A Certificate of Authority for a foreign corporation to do business in the State of Missouri, evidencing GMO’s authority under the law to conduct business in the State of Missouri, was filed with the Commission in Case 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 Case No. EN-2009-0015 and is incorporated herein by reference.

2. In addition to undersigned counsel all correspondences, pleadings, orders and communications regarding this proceeding should be sent to:

¹ All statutory references are to the 2000 Revised Statutes of Missouri as currently supplemented.

Tim Rush
Director, Regulatory Affairs
Kansas City Power & Light Company
1200 Main Street
Kansas City, Missouri 64105
Telephone: (816) 556-2344
Facsimile: (816) 556-2924
E-mail: Tim.Rush@kcpl.com

3. 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: (a) *Staff of the Missouri Public Service Commission v. Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company*, Case No. EC-2015-0309; (b) *The Staff of the Missouri Public Service Commission v. KCP&L Greater Missouri Operations Company*, Case No. EC-2016-0012; and (c) *James Dickson and Angela Dickson v. Kansas City Power & Light*, Case No. EC-2016-0230.

4. GMO has no annual reports or regulatory assessment fees that are overdue in Missouri.

5. While the Company does not know whether this filing is likely to become a contested case subject to the notice of filing requirement of 4 CSR 240-4.020(2), it is filing this application as soon as possible after determining that the above program should be discontinued. Accordingly, should the Commission conclude that the filing of this application is likely to be a contested case and subject to the notice of filing requirement of 4 CSR 240-4.020(2), the Company requests a waiver of the sixty (60) day notice requirement for good cause shown pursuant to 4 CSR 240-4.020(2)(B).

6. By this Application, GMO seeks authority, pursuant to Section 393.1075, 4 CSR 240-20.094(5) and 4 CSR 240-3.164(5), for approval to discontinue the MEEIA Cycle 2 Home Appliance Recycling Rebate program.

7. Section (5) of 4 CSR 240-20.094, Applications for Approval to Discontinue Electric Utility Demand-Side Programs, provides in part:

... Pursuant to the provisions of this rule, 4 CSR 240-2.060, and section 393.1075, RSMo, an electric utility may file an application with the commission for approval to discontinue demand-side programs by filing information and documentation required by 4 CSR 240-3.164(5).
...

8. The information required by Commission Rule 4 CSR 240-3.164(5), is provided in this Application. The Rule provides in part:

When an electric utility files to discontinue a demand-side program as described in 4 CSR 240-20.094(5), the electric utility shall file the following information. ...

- (A) Complete explanation for the utility's decision to request to discontinue a demand-side program.
- (B) EM&V reports for the demand-side program in question.
- (C) Date by which a final EM&V report for the demand-side program in question will be filed.

9. GMO is not filing the EM&V report for the Cycle 2 Home Appliance Recycling Rebate Program since the program only went into effect on April 1, 2016. In addition, there will be no final Cycle 2 EM&V report for the program.

10. The decision to discontinue the Home Appliance Recycling Rebate Program is based upon the following:

GMO desires to discontinue the tariffs for the Home Appliance Recycling Rebate program primarily due to recent changes in the marketplace inhibiting the ability to deliver cost effective savings to GMO customers. GMO's MEEIA Cycle 1 implementer, JACO, went into voluntary receivership largely due to the fall in scrap metal prices nationally and is no longer available to fulfill implementation services for the program. GMO discussed alternatives with another implementer, ARCA, (JACO's only main competitor) which faces similar commodity pricing pressure. The limitation of service providers inherently puts this program at risk as the industry faces commodity/industry price pressures.

Although this program added depth and range to the residential portfolio offerings with its low barrier to entry, no cost for appliance pick-up and issuance of incentive checks to customers, GMO cannot offer this program cost effectively and requests that the tariff be discontinued. The foregoing has been discussed with the DSM Advisory Group on March 8, 2016, and was not met with any resistance.

11. While GMO requests that the aforementioned program be discontinued, GMO does not propose to change its cumulative annual energy and demand savings targets. GMO plans to move the budget assigned to the subject program to the Whole House Efficiency program.

12. GMO has filed tariff sheet revisions contemporaneously with this Application.

WHEREFORE, GMO respectfully requests that the Commission approve the discontinuance of its Home Appliance Recycling Rebate Program as set forth herein and for such other and further relief as the Commission deems appropriate in the circumstances.

Respectfully submitted,

/s/ Roger W. Steiner

Robert J. Hack, MBN 36496

Phone: (816) 556-2791

E-mail: rob.hack@kcpl.com

Roger W. Steiner, MBN 39586

Phone: (816) 556-2314

E-mail: roger.steiner@kcpl.com

Kansas City Power & Light Company

1200 Main – 16th Floor

Kansas City, Missouri 64105

Fax: (816) 556-2787

**Attorneys for KCP&L Greater Missouri
Operations Company**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served upon the parties listed below on this 11th day of April, 2016, by either e-mail or U.S. Mail, postage prepaid.

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102
opc@ded.mo.gov


/s/ Roger W. Steiner

Roger W. Steiner

VERIFICATION

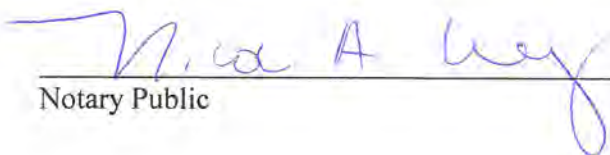
STATE OF MISSOURI)
)SS.
COUNTY OF JACKSON)

I, Tim Rush, being duly sworn according to the law, depose and state that I am Director – 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 facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.



Tim Rush
Director – Regulatory Affairs

Subscribed and sworn to before me this 11th of April, 2016.



Notary Public

My Commission Expires:

Feb. 4, 2019

NICOLE A. WEHRY
Notary Public - Notary Seal
State of Missouri
Commissioned for Jackson County
My Commission Expires: February 04, 2019
Commission Number: 14391200