

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

In the Matter of Kansas City Power & Light)
Company's Notice of Intent to File an)
Application for Authority to Establish a Demand-) File No. EO-2015-0240
Side Programs Investment Mechanism)

In the Matter of KCP&L Greater Missouri Operations)
Company's Notice of Intent to File an)
Application for Authority to Establish a Demand-) File No. EO-2015-0241
Side Programs Investment Mechanism)

**KANSAS CITY POWER & LIGHT COMPANY'S
AND KCP&L GREATER MISSOURI OPERATIONS COMPANY'S
APPLICATION FOR APPROVAL
OF MODIFICATION TO ITS DEMAND-SIDE PROGRAMS**

COMES NOW Kansas City Power & Light Company and Greater Missouri Operations ("KCP&L and GMO" or "the Company"), and submits this *Request to Revise Technical Resource Manual* to the Missouri Public Service Commission ("Commission") for approval. In support thereof, the Company respectfully states as follows:

1. On November 23, 2015, KCP&L and GMO and certain other parties to this proceeding submitted a Non-Unanimous Stipulation and Agreement ("Agreement") to the Commission for approval. After receiving no objections, the Commission issued its Order Approving Non-Unanimous Stipulation and Agreement on March 2, 2016.

2. This filing is made in accordance with the Non-Unanimous Stipulation and Agreement ("Stipulation") filed on March 17, 2016 in Case Nos. EO-2015-0240 and EO-2015-0241 and approved by the Commission on April 6, 2016. The modifications in this application represent modifications to Appendix 2 of the Non-Unanimous Stipulation and Agreement. No program specific tariffs are being requested to be changed in this filing. The TRM is requested to be updated.

3. In approving the Agreement, the Commission also approved a Company-specific Technical Resource Manual (“TRM”). The TRM sets forth measures, the level of energy savings, incremental costs and effective, useful lives associated with each measure. The TRM, and certain updates thereto, are also used to calculate throughput disincentive on a prospective basis (subject to DSIM¹ true-up provisions).

4. The Company offers a revised TRM for the Commission's approval. The revised TRM changes are solely based on incorporating the approved EM&V results from KCP&L and GMO’s program year 2 in MEEIA Cycle 2. The proposed revisions were reviewed by the Third-Party Evaluator (Navigant Consulting).

5. These updates have been discussed with Commission Staff and reviewed by the Implementation Team and by the Company’s contractors. Additionally, the measure changes will not require any adjustment of the portfolio's goals. The revisions are found in the following attachment:

| <u>Attachment</u> | <u>Name</u> | <u>Description</u> |
|--------------------------|--|---|
| A | A-TRM 2019-04-01_Cycle 2 Extension_FILED.xlsm | DSM Measure Assumptions for KCP&L and GMO TRM with changes proposed |
| B | B-Incentive Ranges 2019-04-01_Cycle 2 Extension_FILED.xlsx | Updated Incentive Range list with changes proposed |

6. Based on the information provided herein, KCP&L and GMO asks the Commission to approve the TRM as revised to be effective on April 1, 2019.

¹ “Demand-Side Investment Mechanism”

WHEREFORE, KCP&L and GMO requests the Commission issue an order approving the proposed revisions to the TRM.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Kansas City Power & Light
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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 on this 12th day of March 2019.

/s/ Roger W. Steiner

Counsel for Kansas City Power &
Light Company and KCP&L Greater
Missouri Operations Company