

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

In the Matter of the Application of)
Great Plains Energy Incorporated for)
Approval of its Merger with) File No. EM-2018-0012
Westar Energy, Inc.)

NOTICE OF COMPLIANCE

COME NOW Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”), and for their Notice of Compliance (“Notice”) to the Missouri Public Service Commission (“Commission”), state as follows:

1. Pursuant to Condition 5 of the Merger Commitments and Conditions identified in Exhibit A to the *Stipulation and Agreement* (“Agreement”) filed in this docket on January 12, 2018, as approved by the Commission’s *Report and Order* dated May 24, 2018, KCP&L and GMO hereby notify the Commission of their compliance with the following element of Condition 5:

Each agency is required to provide documentation to KCP&L and GMO to verify how expenditures were incurred.

Community Action Agencies are required to file annual reports with KCP&L and GMO on how funds were expended. KCP&L and GMO shall file a condensed report of the agencies individual annual reports with the Commission, Staff and OPC. Any additional information is left to the agencies’ discretion (e.g., estimated additional homes weatherized as a result of the expenditures).¹

2. Attached as **Exhibit A**, please find a report summarizing the information required by the above-cited portion of Condition 5.

WHEREFORE, KCP&L and GMO request that the Commission take notice of the information herein.

¹ See *Report and Order*, Exhibit A, Condition 5, pp. 1-3, issued May 24, 2018.

Respectfully submitted,

/s/ Robert J. Hack

Robert J. Hack, MBN 36496
Roger W. Steiner, MBN 39586
Kansas City Power & Light Company
1200 Main Street, 16th Floor
Kansas City, MO 64105
(816) 556-2785 (Phone)
(816) 556-2787 (Fax)
rob.hack@kcpl.com
roger.steiner@kcpl.com

**Attorneys for Kansas City Power & Light
Company, and 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 emailed or mailed, postage prepaid, this 3rd day of June 2019, to all counsel of record.

/s/ Robert J. Hack

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

EM-2018-0012 Merger Condition 5 – Report Summary

Each agency is required to provide documentation to KCP&L and GMO to verify how expenditures were incurred.

Community Action Agencies are required to file annual reports with KCP&L and GMO on how funds were expended. KCP&L and GMO shall file a condensed report of the agencies individual annual reports with the Commission, Staff and OPC. Any additional information is left to the agencies' discretion (e.g., estimated additional homes weatherized because of the expenditures).

The entities involved per the Stipulation and Agreement are:

- United Services CAA (CAA of Greater Kansas City)
- Community Action Partnership of Greater St. Joseph (“CAP St. Joe”)
- Community Services, Inc. (“CSI”)
- West Central Missouri CAA
- Missouri Valley CAA
- Community Action Partnership of North Central Missouri.

All entities received \$50,000 in July 2018. All parties to the case agreed that CSI would receive \$100,000 and cover the area that was formerly covered by CAP St. Joe.

To facilitate the compilation of the required report in Condition 5, Geoff Marke, OPC, provided eight questions as guidelines for information to be furnished by the Community Action Agencies (“CAA”).

Those questions are:

- 1.) Were you successful in spending down the annual allocated funds?
- 2.) What did you spend the funds on—please provide details
 - a. Weatherization training and certification of agency personnel?
 - b. Discretionary funds for health and hazard for on-site units (that may or may not be otherwise passed over)?
 - c. Outreach efforts?
 - d. Utility weatherization account?
 - e. Hardship fund for on-bill payments?
- 3.) Can you provide quantification of benefits achieved via the funds (e.g., five more homes, one full time job, etc....)?
- 4.) What would you say are the current strengths your agency possesses?
- 5.) What would you say are the current weaknesses your agency experiences?
- 6.) What are the current threats that your agency faces?

- 7.) What are the current opportunities for your agency to perform its service better-and how can this collaborative or its members help enable that?
- 8.) Do you believe that utility-funded weatherization funds would be better spent with more discretion by your agency? That is, would they be more effectively utilized in the same manner as the “Evergy-merger funds” or as they currently are—adhering to the Missouri Weatherization guidelines. Please explain.

The following is the condensed report of the answers from the 5 entities receiving these funds from Evergy.

1 – Three agencies spent all the funds and two agencies were lagging at a spend level of approximately 30% but have plans for increased spending in the remainder of 2019.

2 and 3 – Four full-time employees were added to staffs along with the utilization of 10 temporary employees. Another full-time employee is completing the on-boarding process. Training took place for 4 individuals. Funds were spent on weatherizing over 50 homes, with some more significant work on upgrading HVAC and a sump pump in 4 homes.

4 – The main theme is all have dedicated, qualified, knowledgeable and energetic staffs.

5 – Lack of resources to be able to adequately reach out to the community to create awareness of benefits available. Also, paperwork requirements and miscellaneous rules. Although staff is dedicated they are hard to keep with the low wages.

6 – Lack of LIHEAP referrals. Lack of quality control inspector types of personnel, and one agency stated their threat is from municipals that buy their power from KCP&L. Also, flooding and the related DED requirements, and, too long of a period to qualify for re-weatherization.

7 – Eliminate the 25% landlord contribution, build relationships with other agencies, allow agency to use funding with municipal companies, conduct private energy audits for people that do not qualify for the programs to generate revenue.

8 – Unanimous feeling about using all funds like how the Evergy funds can be spent to have more flexibility.