

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

In the Matter of the 2009 Resource Plan of)
KCP&L Greater Missouri Operations Company) Case No. EE-2009-0237
Pursuant to 4 CSR 240-22)

**RESPONSE OF KCP&L GREATER MISSOURI OPERATIONS COMPANY TO
COMMENTS CONCERNING ITS APPLICATION FOR WAIVERS RELATED TO ITS
2009 ELECTRIC UTILITY RESOURCE PLANNING SUBMISSION**

Pursuant to 4 CSR 240-2.080 and the January 29, 2009 *Order Directing Filing* issued by the Missouri Public Service Commission (“Commission”) in the above-captioned proceeding, KCP&L Greater Missouri Operations Company (“KCP&L-GMO” or the “Company”) hereby provides the Company’s response to recommendations submitted by the Staff of the Commission (“Staff”) and the Missouri Department of Natural Resources (“MDNR”) in response to the Company’s request for waivers from certain provisions of the Commission’s Electric Utility Resource Planning rules, as set forth in Chapter 22 of the Commission’s regulations. In support hereof, KCP&L-GMO offers as follows:

I. BACKGROUND

1. On December 4, 2008, KCP&L-GMO submitted an application to the Commission, requesting fifteen waivers from certain requirements of 4 CSR 240-22 for purposes of the Company’s upcoming Electric Utility Resource Planning, which is due to be submitted to the Commission by August 5, 2009 (“2009 IRP Submission”). The waiver requests were numbered one through fifteen (“Waiver Requests 1-15”).

2. MDNR and Staff submitted comments concerning the Company’s waiver request on January 13, 2009 and January 9, 2009, respectively. By order issued January 29, 2009, the Commission directed KCP&L-GMO to respond to those comments by February 9, 2009.

II. STAFF’S RECOMMENDATIONS

3. Staff recommended that the Commission grant Waiver Requests 1 through 8 and 11 through 15 without condition. Concerning Waiver Request 9, however, Staff indicated that it “believes this request is satisfactory, as long as [KCP&L-]GMO also provides a satisfactory explanation of why two levels of mitigation are not applicable.” The Company agrees to provide such an explanation in its upcoming 2009 IRP Submission.

4. With respect to Waiver Requests 10, Staff recommends that the Commission grant this request “with the condition that [KCP&L-]GMO provides a satisfactory explanation of how the transmission cost factors and average cost were derived and applied.” Again, the Company agrees to provide this explanation in its 2009 IRP Submission.

III. MDNR RECOMMENDATIONS

5. MDNR addressed Waiver Requests 3, 4, 5, 12, and 14. Concerning Waiver Request 3, MDNR proposes “that in its upcoming 2009 IRP filing, the Company identify [demand-side management] DSM load analysis tasks to which the requirements of 4 CSF 240-22.030 (3) are relevant and document and justify the methods used to accomplish these tasks at an appropriate level of specificity, which provides for greater granularity than that offered by SAE modeling.” Similarly, concerning Waiver Requests 4 and 5, MDNR proposes “that in its upcoming 2009 IRP filing, the Company identify DSM load analysis tasks to which the requirements of 4 CSF 240-22.030 (4) are relevant and document and justify the methods used to accomplish these tasks at an appropriate level of specificity, which provides for greater granularity than that offered by SAE modeling.”

6. The Company believes that its 2009 IRP Submission will fully address the concerns expressed by MDNR regarding Waiver Requests 3, 4, and 5. In explanation of that belief, the Company offers the following description of how it evaluates DSM programs:

7. The Company uses the DSMore™ software to screen and evaluate end-use measures and programs. DSMore™ requires load-shape and price-shape input files. The input files are created by Integral Analytics and have been specifically tailored to the customers of Kansas City Power & Light Company (“KCP&L”), such as the residential, small, medium, large commercial customer classes. The Company will evaluate the need to modify these input files to address any material differences between KCP&L’s customer groups and KCP&L-GMO’s customer groups. Because the service territories of KCP&L and KCP&L-GMO are in close proximity to one another, the Company believes the need for any such changes will be minimal.

8. In addition, the DSMore™ datasets contain the full enumeration of hourly load and price distributions for over 30 years. Because the loads and prices are developed using the same weather zone, the files implicitly measure price and load covariance. The load shape files are further described in the DSMore™ user manual, pages 6-11, which is attached hereto as Schedule 1. Also attached hereto, as Schedule 2, is a copy of the DSMore™ residential load shape definition, which provides the level of detail for information provided by DSMore™. If necessary, DSMore™ provides a number of alternative ways to assign load inputs and load savings. The default DSMore™ customer class load shape can be modified by input parameters. This allows the user to customize a load shape, if needed. DSMore™ also allows the user to specify the hourly energy savings associated with an end-use measure, in both kWh and kW. The methodology is described in the DSMore™ user manual, pages 12-19.

9. As to the level of granularity in the load forecast, the Company uses the U.S. Department Of Energy (“DOE”) history and forecasts of unit energy consumption (kwh/appliance) for electric space heating, air conditioning, electric water heating, electric dryers, clothes washers, televisions, lighting, electric cooking, refrigerators, freezers and miscellaneous to define the trends in use per household for the major end uses, e.g., heating, cooling and other. The DOE forecasts incorporate changes in technology and equipment standards in forecasting unit energy consumption. The DOE's historical and forecasted unit energy consumptions are calibrated to unit energy consumptions that were measured in a conditional demand study for the KCP&L-GMO service territories.

10. For the same appliances listed in the previous paragraph, the Company also uses DOE forecasts of appliance saturations, and calibrates those to our service territory appliance saturation data collected from our surveys.

11. Concerning Waiver Requests 12 and 14 MDNR suggests that approval “be contingent on the Company agreeing that in its upcoming 2009 IRP filing, the utility will clearly identify and document the inputs and outputs of all DSMore™ modeling used to meet rule requirements and will identify and provide explanation of DSMore™ modeling results that fall outside expected ranges as identified by KCPL, the consultant or parties to the filing.” The Company agrees to provide such information in its upcoming 2009 IRP Submission.

12. In light of the foregoing, KCP&L-GMO respectfully requests that the Commission issue an order granting the waivers requested in the Company’s December 4, 2008 application.

Respectfully submitted,

/s/ *Curtis D. Blanc*

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

Dated: February 9, 2009

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all counsel of record either by electronic mail or by first class mail, postage prepaid, on this 9th day of February 2009.

/s/ *Curtis D. Blanc*

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Counsel for

KCP&L Greater Missouri Operations Company