

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

In the Matter of Kansas City Power & Light)
Company’s Application for Approval of Demand-)
Side Programs and for Authority to Establish a) **File No. EO-2014-0095**
Demand-Side Programs Investment Mechanism)

**ISSUES LIST, WITNESS LIST, ORDER OF WITNESSES,
AND ORDER OF OPENING STATEMENTS**

COME NOW the Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), the Missouri Department of Economic Development—Division of Energy (“Division of Energy”), Natural Resources Defense Council (“NRDC”), and the Sierra Club, known collectively herein as “the Parties,” and hereby submits this *Issues List, Witness List, Order of Witnesses, and Order of Opening Statements*, and jointly state as follows:

1. On February 26, 2014,¹ the Commission issued its *Order Modifying Procedural Schedule and Granting Variance* which, inter alia, ordered the parties to file a List of Issues, Order of Cross-Examination (List of Issues) by April 16.

2. On April 17, 2014 Kansas City Power & Light Company (“KCP&L”) filed a Non-Unanimous Stipulation and Agreement (“the Stipulation”) on behalf of KCP&L, the Division of Energy, NRDC, Sierra Club, and Renew Missouri, reflecting agreements between those parties on many of the issues in this case.

3. By motion from Staff filed April 15, an on the record pre-evidentiary proceeding was held on April 18, in which Staff requested that the hearing be extended a month to allow for Staff to adequately analyze Kansas City Power & Light Company’s (“KCPL”) new testimony and the Stipulation filed in the case. By Commission Order filed

¹ All dates herein refer to 2014 unless otherwise state.

that same day, the Commission denied Staff's motion to continue the evidentiary hearing to allow Staff to provide a complete recommendation for the Commission's use and directed Staff to file its Lists of Issues by April 21.

4. The Parties jointly file the following List of Issues. However, the Parties provide the caveat that this may not be a complete list of issues required for the Commission's decision. The Commission's February 26 procedural Order states that issues not listed will be considered uncontested.

Issues List

1. What are the current demand-side management ("DSM") programs in KCPL's demand-side program plan?
2. What are the current demand-side programs investment mechanism ("DSIM") associated with the demand-side program plan?
3. What are the appropriate tariffs to implement each program and DSIM recovery mechanism?
4. As modified by the Non-Unanimous Stipulation and Agreement filed in this case, should the Commission approve KCPL's current program plan, approve it with modification acceptable to KCPL, or reject it, as provided in Rule 4 CSR 240-20.094(3)?
 - A. If the program plan is approved or modified, what, if any, variances are necessary and reasonable?
 - B. If the program plan is approved or modified, what are the Commission's findings for each program listed in the Stipulation regarding the following concerns:
 - i. Projected and gross annual energy savings targets and cumulative energy savings targets
 - ii. Projected and gross annual demand savings targets and cumulative demand savings targets
 - iii. Tariff
 - iv. Any market transformation elements included in the program and an EM&V method to isolate those elements
 - v. Demonstration of cost-effectiveness:
 1. Annual revenue requirement impact based on Chapter 22 analysis and the impact of the demand-side programs and

- program plans on the net present value of revenue requirements of the electric utility
2. Customers targeted
 3. Measures included
 4. Customer incentives
 5. Proposed promotional techniques
- C. Should the Commission approve the establishment of KCPL's proposed Demand-Side Programs Investment Mechanism (DSIM) as per Rule 4 CSR 240-20.093(2)(B)?
- i. If a lost margin approach is approved:
 - a. What are appropriate net-to-gross (NTG) ratios?
 - b. How should lost margins be calculated?
 - ii. How should program costs be collected and treated?
- D. Should the Commission allow KCP&L to collect a fixed dollar amount as an incentive after the 18-month program plan is concluded, with that dollar amount dependent upon KCP&L meeting various savings (kWh/kW) thresholds? If so, are the thresholds and dollar amounts proposed by KCP&L appropriate?
- E. What acronym should the Commission approve to designate a separate line item to appear on bills relating to charges for the DSM programs approved under MEEIA; "DSIM Charge" as proposed by KCPL, or the phrase "Energy Efficiency Program Charge" or "Energy Efficiency Investment Charge" as suggested by Staff?
5. Are there fundamental defects in the KCPL Application, as modified by the Non-Unanimous Stipulation and Agreement?
6. Is KCPL allowed to request, prior to June 1, 2015, a rider associated with a Commission approved MEEIA program plan beginning June 1, 2015?
7. Once the Commission reaches its findings on each of the above issues, is a "redo" of KCPL's calculations and modeling necessary prior to the Commission having the ability to make the findings necessary for a final Report and Order in this case other than (1) rejection, or (2) a tracker based on lost revenue recovery as defined by the Commission's rules?
- A. If so, when and how should the analysis be performed?
 - B. Should the Commission afford the parties an opportunity to review and comment on KCPL's redone analysis prior to the Commission's final Report and Order in this case?

WHEREFORE, the Parties submit this *Issues List* for consideration by the Commission.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 21st day of April, 2014.

/s/ Andrew Linhares

Andrew Linhares