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

In the Matter of the First Prudence Review of	)	
Kansas City Power & Light Company	)	
Implementation of Energy Efficiency Programs in	)	Case No. EO-2016-0183
Furtherance of the Missouri Energy Efficiency	)	
Investment Act (MEEIA)	)	

## KANSAS CITY POWER & LIGHT COMPANY'S RESPONSE TO MISSOURI PUBLIC SERVICE COMMISSION STAFF AUDIT

Kansas City Power & Light Company ("KCP&L" or "Company") submits the following Response ("Response") to the June 13, 2016 Prudence Review of Costs Related to the Missouri Energy Efficiency Investment Act for the Electric Operations of KCP&L ("Audit") for consideration by the Missouri Public Service Commission ("Commission") in this docket. KCP&L states as follows:

## I. The Seminar Costs are Appropriate MEEIA Costs.

1. Staff proposes to disallow \$6000 of "seminar costs". This cost was mischaracterized by Staff as a solar-based training seminar; however, the costs were actually for a research study. The purpose of the research study was to provide insight into the motivations and drivers of commercial and industrial ("C&I") customers' acquisition of photovoltaic and other distributed generation ("DG"), including Combined Heat and Power ("CHP") and storage. So, while it is true that the study included solar, they study was much more comprehensive. The purpose of KCP&L's participation in the study (as it relates to MEEIA) was to gain insight to our customers' receptiveness to CHP, storage, and other DG options that would assist us in developing future MEEIA programs. In short, the Company learned that while our customers are interested in these options and have some understanding of solar options, they do not understand DG and would need significant education and support from KCP&L to

successfully implement any of these options. This type of information is valuable to the Company as it informed KCP&L as to the mindset of its customers regarding CHP. CHP has been discussed during stakeholder meetings on several occasions and KCP&L felt that the cost of this study was a prudent cost to undertake to further gain primary data from customers within

our service territory.

While the Company believes that the study cost is an appropriate MEEIA cost, KCP&L

is not requesting a hearing on this issue due to the size of Staff's adjustment. The Company will

have further discussions with Staff and provide additional information in an attempt to resolve

the issue.

II. TD-NSB Calculation

2. KCP&L agrees with Staff that it under-billed its customers for the TD-NSB

amount. KCP&L is seeking to recover the under-billed amount in its current DSIM rider filing.

WHEREFORE, KCP&L respectfully submits this response.

Respectfully submitted,

<u>|s| Roger W. Steiner</u>

Robert J. Hack, MBN 36496 Roger W. Steiner, MBN 39586

Kansas City Power & Light Company

1200 Main Street

Kansas City, MO 64105

Phone: (816) 556-2791

rob.hack@kcpl.com

roger.steiner@kcpl.com

Attorneys for Kansas City Power & Light Company

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## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this  $23^{rd}$  day of June, 2016 to all counsel of record in this proceeding.

|s| Roger W. Steiner

Attorney for Kansas City Power & Light Company