

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

In the Matter of KCP&L Greater Missouri Operations)
Company's Application for Approval of Modifications to) File No. EO-2014-0355
Its Demand-Side Programs)

**KCP&L GREATER MISSOURI OPERATIONS COMPANY'S
NOTICE OF CORRECTED DIRECT TESTIMONY OF TIM M. RUSH**

COMES NOW KCP&L Greater Missouri Operations Company ("GMO") and for its Notice of Corrected Direct Testimony of Tim M. Rush states as follows:

1. On June 11, 2014, GMO filed its Application for Approval of Modification to Its Demand-Side Programs and Motion for Expedited Treatment along with the supporting Direct Testimony of Tim M. Rush.

2. Subsequently, GMO determined that its current cumulative annual energy and demand savings targets referred to in the direct testimony of Tim M. Rush, pages 5 and 6, are incorrect. Corrections to the GMO cumulative annual energy and demand savings targets are necessary in order for GMO to implement the signatories' agreement outlined in the Non-Unanimous Stipulation and Agreement filed in File No. EO-2014-0095 on May 27, 2014 and approved by Commission Order on June 5, 2014.¹

3. GMO is filing herewith corrected pages 5 and 6 of the Direct Testimony of Tim M. Rush.

¹ See *Non-Unanimous Stipulation and Agreement*, p. 10, ¶ 9. Residential Lighting.

WHEREFORE, GMO respectfully provides its Notice of Corrected Direct Testimony of
Tim M. Rush.

Respectfully submitted,

/s/ Roger W. Steiner

Robert J. Hack, MBN 36496

Lead Regulatory Counsel

Phone: (816) 556-2791

E-mail: rob.hack@kcpl.com

Roger W. Steiner, MBN 39586

Phone: (816) 556-2314

E-mail: roger.steiner@kcpl.com

Corporate Counsel

Kansas City Power & Light Company

1200 Main – 16th Floor

Kansas City, Missouri 64105

Fax: (816) 556-2787

Attorneys for KCP&L Greater Missouri Operations
Company

Certificate of Service

I hereby certify that a true and correct copy of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties of record on this 24th day of June, 2014.

/s/ Roger W. Steiner

Roger W. Steiner

1 **Q: What is the impact to GMO energy and demand savings by implementing this program?**

2 A: GMO has modeled the program using the DSMore modeling software and using the same
3 consistent assumptions utilized for the KCP&L program and has determined that the impact to
4 implement the residential lighting program at GMO will result in a savings of 25,161 MWh and
5 2.7 MW over the 18-month period beginning in July 2014 through December 2015. As
6 presented in the program write-up, the Total Resource Cost (TRC) test is greater than one, which
7 demonstrates that this is a beneficial program.

8 **Q: What changes are you proposing to the GMO MEEIA plan that was implemented in**
9 **January 2013?**

10 A: As part of the 0095 Stipulation in the KCP&L MEEIA, GMO agreed to modify the targets to
11 reflect the increase in energy and demand savings expected from a new residential lighting
12 program. The current targets for the GMO MEEIA are:

13 Energy 150,346 MWh

14 Demand 37.521 MW

15 The 37.521 MW target is described as the cumulative annual net MW savings expected to be
16 captured in the third year of the GMO MEEIA program as described in the Non-Unanimous
17 Stipulation and Agreement Resolving KCP&L Greater Missouri Operations Company's MEEIA
18 Filing, pages 6-7. The energy savings target, 150,346 MWh, is similarly described as the
19 cumulative annual net MWh savings in the third year of the three year Plan period. On June 23,
20 2014, MPSC Staff advised GMO that the current GMO cumulative annual energy and demand
21 savings targets were incorrectly calculated in Case No. EO-2012-0009. GMO discussed this
22 situation with MPSC Staff and concluded that for purposes of the GMO MEEIA current
23 cumulative annual energy savings target should be 136,120 MWh and that the current
24 cumulative annual demand savings targets should be 63.852 MW.

25 By implementing the residential lighting program, the GMO MEEIA targets should be adjusted
26 to:

² MEEIA rules 4 CSR 240-3.163, 4 CSR 240-3.164, 4 CSR 240-20.093 and 4 CSR 240-20.094 became effective on May 31, 2011.

1 Energy 161,281 MWh

2 Demand 66.525 MW

3 As part of the measurement of the residential lighting program, GMO will use a net to gross
4 (“NTG”) value of “0.9” for 2014 CFL measures, and “0.7” for 2015 CFL measures. GMO will
5 use a NTG value of 1.0 for all LED measures in 2014 and 2015. GMO will not offer any rebates
6 or buy-downs for incandescent lamps. The measure life for the GMO residential lighting
7 program will have the same measure life as the KCP&L residential lighting program.

8 **Q: Is GMO asking for any changes to the recovery mechanism?**

9 A: No. GMO is not requesting changes to the current recovery mechanism. The costs of the
10 program and the TD-NSB levels will be reflected in the ongoing costs of all of the GMO
11 programs and will be recovered in the true-up and reconciliation of the overall MEEIA
12 programs. Under the Non-Unanimous Stipulation and Agreement resolving GMO’s MEEIA
13 filing, File No. EO-2012-0009 (“0009 Stipulation”), the Company may request approval for a
14 rider mechanism as compared to the current recovery mechanism which is included in base
15 rates.

16 The Company is requesting approval of the tariff filed simultaneously with its Application that
17 will implement a residential lighting program consistent with that which was recently approved
18 for KCP&L. The Company is also requesting approval of a modification to the overall program
19 targets and approval to utilize a net to gross specifically for the residential lighting program as
20 outlined above.

21 **B. VARIANCES**

22 **Q: Is the Company requesting any variances in this filing?**

23 A: Yes.

24 **Q: Please describe the variances being requested and the basis for the variance requests.**

25 A: Consistent with the 0009 Stipulation, the following variances were agreed upon by signatories
26 and are still needed and respectfully requested: