

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

In the Matter of KCP&L Greater Missouri Operations            )  
Company's Application to Discontinue Certain                    )        Case No.  
Demand-Side Management Programs.                                )

**APPLICATION OF KANSAS CITY POWER & LIGHT COMPANY**

COMES NOW Kansas City Power & Light Company ("KCP&L" or "Company"), by and through counsel, pursuant to Section 393.1075, RSMo. Cum. Supp. 2010, 4 CSR 240-20.094(5) and 4 CSR 240-3.164(5), and files this Application to Discontinue Certain Demand-Side Management Programs. In support thereof, KCP&L respectfully states to the Missouri Public Service Commission ("Commission"):

1. KCP&L is a Missouri corporation with its principal office and place of business at One Kansas City Place, 1200 Main, Kansas City, Missouri 64105. KCP&L is primarily engaged in the generation, transmission, distribution, and sale of electricity in western Missouri and eastern Kansas, operating primarily in the Kansas City metropolitan area. KCP&L is an "electrical corporation" and "public utility" as those terms are defined in Mo. Rev. Stat. § 386.020 (2000), as amended<sup>1</sup>, and, as such, is subject to the jurisdiction of the Commission as provided by law. KCP&L provided its Certificate of Good Standing in Case No. EF-2002-315, which is incorporated herein by reference.

2. In addition to undersigned counsel all correspondences, pleadings, orders and communications regarding this proceeding should be sent to:

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<sup>1</sup> All statutory references are to the 2000 Revised Statutes of Missouri as currently supplemented.

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3. KCP&L has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or rates, which has occurred within three years of the date of this Application other than the following: (a) *Staff of the Missouri Public Service Commission v. Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company*, Case No. EC-2015-0309.

4. KCP&L has no annual reports or regulatory assessment fees that are overdue in Missouri.

5. While the Company does not know whether this filing is likely to become a contested case subject to the notice of filing requirement of 4 CSR 240-4.020(2), it is filing this application as soon as possible after determining that the above program should be discontinued. Accordingly, should the Commission conclude that the filing of this application is likely to be a contested case and subject to the notice of filing requirement of 4 CSR 240-4.020(2), the Company requests a waiver of the sixty (60) day notice requirement for good cause shown pursuant to 4 CSR 240-4.020(2)(B).

6. By this Application, KCP&L seeks authority, pursuant to Section 393.1075, 4 CSR 240-20.094(5) and 4 CSR 240-3.164(5), for approval to discontinue the MEEIA Cycle 2 Home Appliance Recycling Rebate program.

7. Section (5) of 4 CSR 240-20.094, Applications for Approval to Discontinue Electric Utility Demand-Side Programs, provides in part:

... Pursuant to the provisions of this rule, 4 CSR 240-2.060, and section 393.1075, RSMo, an electric utility may file an application with the commission for approval to discontinue demand-side programs by filing information and documentation required by 4 CSR 240-3.164(5).

...

8. The information required by Commission Rule 4 CSR 240-3.164(5), is provided in this Application. The Rule provides in part:

When an electric utility files to discontinue a demand-side program as described in 4 CSR 240-20.094(5), the electric utility shall file the following information. ...

- (A) Complete explanation for the utility's decision to request to discontinue a demand-side program.
- (B) EM&V reports for the demand-side program in question.
- (C) Date by which a final EM&V report for the demand-side program in question will be filed.

9. KCP&L is not filing the EM&V report for the Cycle 2 Home Appliance Recycling Rebate Program since the program only went into effect on April 1, 2016. In addition, there will be no final Cycle 2 EM&V report for the program.

10. The decision to discontinue the Home Appliance Recycling Rebate Program is based upon the following:

KCP&L desires to discontinue the tariffs for the Home Appliance Recycling Rebate program primarily due to recent changes in the marketplace inhibiting the ability to deliver cost effective savings to KCP&L customers. KCP&L's MEEIA Cycle 1 implementer, JACO, went into voluntary receivership largely due to the fall in scrap metal prices nationally and is no longer available to fulfill implementation services for the program. KCP&L discussed alternatives with another implementer, ARCA, (JACO's only main competitor) which faces similar commodity pricing pressure. The limitation of service providers inherently puts this program at risk as the industry faces commodity/industry price pressures.

Although this program added depth and range to the residential portfolio offerings with its low barrier to entry, no cost for appliance pick-up and issuance of incentive checks to

customers, KCP&L cannot offer this program cost effectively and requests that the tariff be discontinued. The foregoing has been discussed with the DSM Advisory Group on March 8, 2016, and was not met with any resistance.

11. While KCP&L requests that the aforementioned program be discontinued, KCP&L does not propose to change its cumulative annual energy and demand savings targets. KCP&L plans to move the budget assigned to the subject program to the Whole House Efficiency program.

12. KCP&L has filed tariff sheet revisions contemporaneously with this Application.

**WHEREFORE**, KCP&L respectfully requests that the Commission approve the discontinuance of its Home Appliance Recycling Rebate Program as set forth herein and for such other and further relief as the Commission deems appropriate in the circumstances.

Respectfully submitted,

*/s/ Roger W. Steiner*

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**Attorneys for Kansas City Power & Light  
Company**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was served upon the parties listed below on this 11<sup>th</sup> day of April, 2016, by either e-mail or U.S. Mail, postage prepaid.

General Counsel  
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*/s/ Roger W. Steiner*

Roger W. Steiner

VERIFICATION

STATE OF MISSOURI     )  
  )SS.  
COUNTY OF JACKSON    )

I, Tim Rush, being duly sworn according to the law, depose and state that I am Director - Regulatory Affairs of Kansas City Power & Light Company, that I am authorized to make this verification on behalf of Kansas City Power & Light Company, and that the facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

  
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Tim Rush  
Director - Regulatory Affairs

Subscribed and sworn to before me this 11<sup>th</sup> of April, 2016.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

Feb. 4, 2019

NICOLE A. WEHRY  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Jackson County  
My Commission Expires: February 04, 2019  
Commission Number: 14391200