

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light)
Company's Notice of Intent to File an) File No. EO-2019-0132
Application for Authority to Establish a Demand-)
Side Programs Investment Mechanism)

**POSITION STATEMENT OF
THE NATIONAL HOUSING TRUST**

COMES NOW the National Housing Trust ("NHT"), pursuant to the September 17, 2019 *List of Issues, Order of Opening Statements, and Order of Cross Examination* filing in this case, and states:

Statements of Position:

1. *Should the Commission approve, reject, or modify the Company's MEEIA Cycle 3 Plans ("MEEIA 3"), along with the waivers in the Company's application intended to enable its implementation?*

POSITION: The Commission should approve the Company's MEEIA Cycle III Application and waivers.

- a. *If MEEIA 3 should be modified, how should the plans be modified?*

POSITION: The Commission should modify the Income-Eligible Multifamily program and earnings opportunity metrics as outlined in the Rebuttal Testimony of Annika Brink on behalf of NHT, or else as outlined in a subsequent agreement of the parties.

2. *When it developed MEEIA 3, did the Company value demand-side investments equal to traditional investments in supply and delivery infrastructure?*

POSITION: After reviewing the Company's initial filing, potential study, and integrated resource plan, NHT is not aware of any errors the Company made in attempting to value demand-side investments equal to traditional investments in supply and delivery infrastructure. The proposed programs in this case all meet the TRC test (with the exception of income-eligible programs). Furthermore, NHT believes the Company is likely undervaluing demand-side investments in its analysis due to the substantial non-energy benefits of energy efficiency.

3. *Is the proposed MEEIA 3, as designed by the Company, expected to provide benefits to all customers in the customer class in which the programs are proposed, regardless of whether the programs are utilized by all customers?*

POSITION: Yes. It is the understanding of NHT that the Company's proposed Plan would deliver benefits to all customers, regardless of whether the programs are utilized by all customers. As the least-cost resource, energy efficiency can displace more expensive supply-side alternatives. In addition, as stated above, energy efficiency carries with it substantial non-energy benefits for both participating and non-participating customers.

4. *If the Commission approves or modifies MEEIA 3, what DSIM provisions should be approved to align recovery with the MEEIA statute?*

POSITION: The MEEIA statute expressly recognizes the importance of focusing on low-income efficiency, by exempting programs targeted to low-income customers from cost-effectiveness requirements. Accordingly, including specific earnings opportunity criteria rewarding the Company for appropriately serving the low-income sector will better align the DSIM with the aims of the MEEIA statute. Please refer to the Rebuttal Testimony of Annika Brink on behalf of NHT for further details on our position.

5. *Should Opt-Out Customers be eligible to participate in Business Demand Response programs?*

a. *MECG sub issue: “Should GMO be required to publish in its tariff the participation payment to customers that participate in the Business Demand Response programs?”*

POSITION: NHT takes no position on these issues.

/s/ Andrew J. Linhares

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COUNSEL FOR THE NATIONAL
HOUSING TRUST

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 18th day of September, 2019, to all counsel of record.

/s/ Andrew J. Linhares _____

Andrew J. Linhares