

**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)

RESPONSE OF RENEW MISSOURI

COMES NOW, Earth Island Institute d/b/a Renew Missouri ("Renew Missouri"), and pursuant to the Commission's March 9, 2016 Order Directing Filing, responds to KCP&L's Application for Approval of Demand Side Programs Budget Modifications dated March 8, 2016.

1. On November 13, 2015, KCP&L filed its first application for modification of its approved 2013-2015 ("Cycle 1") MEEIA Plan, requesting permission to continue its Cycle 1 programs beyond their original end point. On December 11, parties filed a Non-Unanimous Stipulation containing a plan to allow Cycle 1 programs to continue until the delayed start of Cycle 2. The Commission approved the stipulation on December 22.

2. On March 8, 2016, KCP&L filed its second application for modification of its Cycle 1 MEEIA Plan, in which it estimates that Cycle 1 will ultimately reach 260% of budget, or an overage of \$30.7 million. The company asks that Cycle 1 programs be allowed to continue until all timely applications can be processed and implemented.

3. Renew Missouri echoes the recommendation of Staff that KCP&L's modification request be granted. Furthermore, Renew Missouri herein adopts the assertions and reasoning of the Sierra Club that KCP&L's request be granted despite misgivings about large budget overages.

4. Renew Missouri believes approving the requested modification is prudent, given the success of KCP&L's programs, the cost-effective benefits such programs have provided to

customers, and the relatively small harm that would result. Failing to approve the requested modification may have the affect of preventing customers from completing scheduled projects and realizing benefits which they had a reasonable expectation of receiving.

5. Energy efficiency is a unique resource in that, when cost-effective, its benefits continue to accrue over the long-term while lowering demand system-wide. Accordingly, the Commission should strive to accommodate as much energy efficiency investments as can be cost-effectively made.

5. The projected 260% cost overage, while significant, is understandable given the delays in settlement negotiations between the parties concerning KCP&L's 2016-2018 Cycle 2 MEEIA Plan, not approved until this March.

WHEREFORE, Renew Missouri respectfully requests that the Public Service Commission approve the application for budget modifications.

Respectfully Submitted

/s/ Andrew J. Linhares

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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 4th day of April, 2016, to all counsel of record:

/s/ Andrew J. Linhares
Andrew J. Linhares