

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
Case No. EO-2014-0355 and Tariff Tracking No. JE-2014-0537  
KCP&L Greater Missouri Operations Company

FROM: John Rogers, Utility Regulatory Manager  
Jason Huffman, Utility Regulatory Auditor II  
Tammy Huber, Utility Policy Analyst II

/s/ Natelle Dietrich 06/27/2014

Tariff, Safety, Economic and  
Engineering Analysis Department / Date

/s/ Jeff Keevil 06/27/2014

Staff Counsel's Office / Date

SUBJECT: Staff Recommendation to Approve KCP&L Greater Missouri Operations Company's Application to Add the Home Lighting Rebate Program to its Demand-Side Management Program Plan, to Modify the Plan's Cumulative Annual Energy and Demand Savings Targets, to Approve GMO's Request for Variances to the Commission's Rules, and to Approve Tariff Sheets on an Expedited Basis

DATE: June 27, 2014

### Summary

In response to paragraph 9 of the Non-Unanimous Stipulation and Agreement in Case No. EO-2014-0095, KCP&L Greater Missouri Operations Company ("GMO") seeks Missouri Public Service Commission ("Commission") approval to add a residential Home Lighting Rebate program to its current Missouri Energy Efficiency Investment Act ("MEEIA") program plan and to modify its MEEIA program plan's cumulative annual energy and demand savings targets<sup>1</sup> to: 1) include the cumulative annual energy and demand savings targets for the proposed residential Home Lighting Rebate program, and 2) correct errors in the current MEEIA program plan's cumulative annual energy and demand savings targets.<sup>2</sup> The proposed Home Lighting Rebate

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<sup>1</sup> GMO's 3-year (2013 – 2015) MEEIA program plan's current annual energy and demand savings targets are contained in KCP&L Greater Missouri Operations Company P.S.C.MO. No. 1, Original Sheet No. R-63.01, and are equal to 150,346,738 kWh and 37,521 kW, respectively.

<sup>2</sup> Tariff Tracking No. JE-2014-0537 contains GMO's proposed 3-year MEEIA program plan cumulative annual energy and demand savings targets on KCP&L Greater Missouri Operations Company P.S.C.MO. No. 1, 1st Revised Sheet No. R-63.01, and are equal to 161,280,888 kWh and 66,525 kW, respectively, which reflect the addition of 25,162,228 kWh and 2,673 kW for the proposed residential Home Lighting Rebate program and the correction of the 2014 and 2015 incremental energy and demand savings for the MPower and Residential Reports programs.

program has a budget of \*\* \_\_\_\_\_<sup>3</sup> \*\* for the 18-month period ending December 31, 2015. GMO is also requesting approval of variances from Commission MEEIA rules<sup>4</sup>, including variances needed to utilize specific net to gross values and deemed annual energy and demand savings for certain end use measures installed as a result of the residential Home Lighting Rebate program when determining GMO's throughput disincentive due to the MEEIA program plan. While GMO is requesting a change to its MEEIA program plan's cumulative annual energy and demand savings targets, GMO has not requested any change to its current performance incentive award mechanism,<sup>5</sup> and no such change is required by either paragraph 9 of the Non-Unanimous Stipulation and Agreement in Case No. EO-2014-0095 or by any of the Commission's MEEIA rules.

The GMO residential Home Lighting Rebate program is identical to a similar program of Kansas City Power & Light Company ("KCP&L"), which is approved to begin implementation on July 6, 2014.<sup>6</sup> Although GMO's proposed tariff sheets for its Home Lighting Rebate program and for its cumulative annual energy and demand savings targets (Tariff Tracking No. JE-2014-0537) have an issue date of June 11, 2014, and an effective date of July 11, 2014, GMO is requesting expedited treatment with an effective date of July 6, 2014, so GMO and KCP&L can begin implementation of their Home Lighting Rebate programs on the same date, July 6, 2014.

Staff reviewed the direct testimony<sup>7</sup> and supporting schedules and work papers of GMO witness Tim M. Rush, which describes the residential Home Lighting Rebate program and the program's impact on the current GMO MEEIA program plan. Staff also reviewed the tariff sheets and supporting information filed in Tariff Tracking No. JE-2014-0537. Staff performed an analysis of the impact of correcting the errors in the 2014 and 2015 incremental annual energy and demand savings targets for the MPower and Residential Reports programs on the GMO performance incentive award amount. Through its analysis, Staff finds that by correcting for the errors, about 6 percent greater weighted<sup>8</sup> cumulative annual energy and demand savings through evaluation, measurement and verification ("EM&V") is expected in order for GMO to receive any given performance award amount (see Exhibit 1).

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<sup>3</sup> Page 7 of Schedule TRM-1.

<sup>4</sup> The Commission's MEEIA Rules include: 4 CSR 240-3.163, 4 CSR 240-3.164, 4 CSR 240-20.093 and 4 CSR 240-20.094.

<sup>5</sup> See paragraphs 5, 5.b.ii., 6, and 6.c., and Appendix B of the Non-Unanimous Stipulation and Agreement approved by the Commission on November 15, 2012 in File No. EO-2012-0009.

<sup>6</sup> Non-Unanimous Stipulation and Agreement approved by the Commission on June 5, 2014 in File No. EO-2014-0095 and Tariff Tracking No. YE-2014-0533.

<sup>7</sup> Tim Rush's direct testimony was filed on June 11, 2014 in File No. EO-2014-0355. On June 24, 2014, a filing was made to correct pages 5 - 6 of Mr. Rush's direct testimony.

<sup>8</sup> Paragraph 5.b.ii. of Non-Unanimous Stipulation and Agreement approved by the Commission on November 15, 2012 in File No. EO-2012-0009 states: "... The MWh performance achievement level (expressed as a percentage) will be weighted 80% and the MW performance achievement level (expressed as a percentage) will be weighted 20% to determine the overall level of achievement for the Plan when determining the Performance Incentive Award Amount."

As a result of its review, Staff finds that GMO has complied with paragraph 9 of the Non-Unanimous Stipulation and Agreement in Case No. EO-2014-0095. Staff recommends that the Commission approve: 1) GMO's proposed residential Home Lighting Rebate program which has a budget of \*\* \_\_\_\_\_ \*\*; 2) the program's cumulative annual energy and demand savings targets of 25,162,228 kWh and 2,673 kW, respectively, 3) the modified GMO MEEIA program plan's cumulative annual energy and demand savings targets of 161,280,888 kWh and 66,525 kW, respectively, and 4) all variances to the Commission's Rules requested in GMO's application. Further, Staff recommends expedited treatment of the following tariff sheets, so that each tariff sheet becomes effective July 6, 2014; good cause exists to allow the tariff sheets to become effective on less than 30 days' notice so that the tariff sheets for KCP&L's and GMO's residential Home Lighting Rebate programs will have the same effective date and the programs can be launched and marketed to the KCP&L and GMO Missouri customers beginning July 6, 2014:

P.S.C. MO. No. 1

11th Revised Sheet No. R-3, Cancelling 10th Revised Sheet No. R-3

3rd Revised Sheet No. R-63, Cancelling 2nd Revised Sheet No. R-63

1st Revised Sheet No. R-63.01, Cancelling Original Sheet No. R-63.01

Original Sheet No. R-64.21

**Background and Changes to GMO MEEIA Program Plan**

On November 15, 2012, the Commission issued an Order in GMO File No. EO-2012-0009 approving a Non-Unanimous Stipulation and Agreement that established GMO's three year<sup>9</sup> MEEIA program plan and its demand-side programs investment mechanism ("DSIM").

On June 5, 2014, a Non-Unanimous Stipulation and Agreement was approved in KCP&L File No. EO-2014-0095, and includes the following in its paragraph 9:

"Residential Lighting. KCP&L will target the sales points which reflect a close proximity to customers' residences in KCP&L-MO territory. GMO has informed the advisory group of its intent to file the same lighting program in GMO. GMO will file by July 1, 2014, or sooner, under 4 CSR 240-20.094(4) to modify its MEEIA programs and file a tariff to adopt the same residential lighting rebate program as KCP&L to terminate December 2015. This filing will require modification of the savings target of the GMO DSIM to reflect a net increase of 25,161 MWh and 2.7 MW to the savings targets for purposes of the performance incentive award, but will not modify any other GMO MEEIA programs, or modify the percentage used to calculate GMO's TD-NSB share. KCP&L and

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<sup>9</sup> The three year MEEIA program plan began on January 26, 2012 and ends on December 31, 2015.

GMO will use a NTG value of “0.9” for 2014 CFL measures, and “0.7” for 2015 CFL measures. KCP&L and GMO will use a NTG value of 1.0 for all LED measures in 2014 and 2015. KCP&L and GMO will not offer any rebates or buy-downs for incandescent lamps. The measure life for the GMO residential lighting program will have the same measure life as the KCP&L residential lighting program.”

On June 11, 2014, GMO filed with the Commission four (4) proposed tariff sheets<sup>10</sup>, bearing an issue date of June 11, 2014, and an effective date of July 11, 2014, seeking approval of the Home Lighting Rebate Program and related Table of Contents and Summary tariff sheets. GMO requested an expedited effective date of July 6, 2014 so that the tariff sheets for KCP&L’s and GMO’s residential Home Lighting Rebate programs will have the same effective date and the programs can be launched and marketed to the KCP&L and GMO Missouri customers beginning July 6, 2014. On June 24, 2014, GMO filed corrected 1st Revised Sheet No. R-63.01, replacing Original Sheet No. R-63.01. 1<sup>st</sup> Revised Sheet No. R-63.01 corrects errors in the 2014 and 2015 incremental energy and demand savings targets for the MPower and Residential Reports programs and adds a column for the cumulative annual energy and demand savings targets for each program and for the portfolio.

Rule 4 CSR 240-20.094(3) requires the Commission to approve demand-side programs or program plans, and annual demand and energy savings targets for each demand-side program it approves, provided that new demand-side programs have a total resource cost test of greater than one, are consistent with a goal of achieving all cost-effective demand-side savings, have reliable EM&V plans, and are included in the electric utility’s preferred plan or have been analyzed through the integration process required by 4 CSR 240-22.060 to determine the impact of the demand-side programs and program plans on the net present value of revenue requirements of the electric utility.

Based on the supplied DSMore<sup>®</sup> work papers, the Residential Lighting Rebate program is expected to have a TRC of 1.65 and is consistent with a goal of achieving all cost-effective demand-side savings. An independent contractor will conduct EM&V pursuant to 4 CSR 240-3.163(7) and 4 CSR 240-20.093(7).

The residential Home Lighting Rebate program has not been analyzed through the integration process required by 4 CSR 240-20.094(3)(A)3 to determine the impact of the program on the net present value of revenue requirements of the electric utility and GMO has not yet included the program in its adopted preferred resource plan. According to Tim Rush’s direct testimony, this program does not have a material effect on the current preferred resource plan and will be added

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<sup>10</sup> The four tariff sheets were assigned Tariff Tracking No. JE-2014-0537.

to GMO's next Chapter 22 annual update filing in April 2015. GMO requested a variance from this requirement.

### **Correction of Errors in Cumulative Annual Energy and Demand Savings Targets**

On June 23, 2014, MPSC Staff advised GMO that the current GMO cumulative annual energy and demand savings targets were incorrectly calculated in Case No. EO-2012-0009. GMO discussed this situation with MPSC Staff and concluded that for purposes of the GMO MEEIA the current cumulative annual energy savings target should be 136,118,660 kWh and that the current cumulative annual demand savings targets should be 63,852 kW (see Exhibit 2).

The sources of the errors in the current cumulative annual energy and demand savings target are: 1) incorrectly using cumulative annual energy and demand savings for the MPower and Residential Reports programs in 2014 and 2015 instead of incremental annual energy and demand savings,<sup>11</sup> and 2) incorrectly using the sum of the programs' 2015 incremental annual demand savings (37.521 MW on Original Sheet No.R-63.01) instead of the 2015 cumulative annual demand savings<sup>12</sup> (63,852 kW on Exhibit 2).

The errors in the 2014 and 2015 incremental annual energy and demand savings targets are corrected on the redline version of 1st Revised Sheet No. R-63.01, Cancelling Original Sheet No. R-63.01, filed in Tariff Tracking No. JE-2014-0537 on June 24, 2014.

### **Additional Variances Requested**

Through Tim Rush's direct testimony,<sup>13</sup> GMO is requesting approval of the same variances contained in the Stipulation and Agreement approved in File No. EO-2012-0009. These variances pertain to net shared benefits ("NSB"), tariff flexibility/promotional practices, integrated resource plan ("IRP"), and annual reporting.

The NSB variances related to timing of recovery of NSB include Rules 4 CSR 240-20.093(2)(H), 20.093(2)(H)3, 20.093(1)(EE), 20.093(1)(A), 20.093(1)(C), 20.093(1)(M)5, 20.094(1)(Z), 20.094(1)(C), 20.094(1)(J)5, 3.163(1)(F)5, and 3.164(1)(F)5. The variance related to the calculation of NSB includes Rule 4 CSR 240-20.093(2)(H). The variances related to NSB (annual) include Rules 4 CSR 240-3.163(1)(A), 3.163(1)(J), 20.093(1)(A), 20.093(1)(Q), 20.093(2)(M), 20.093(2)(H), 20.093(1)(EE), 20.094(1)(C), and 20.094(1)(Z).

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<sup>11</sup> There are no energy savings for the demand response MPower program.

<sup>12</sup> 4 CSR 240-20.094(2)(A) and (B) provide the definitions for incremental annual energy and demand savings and cumulative annual demand savings, respectively.

<sup>13</sup> Rush direct testimony page 6 line 20 through page 8 line 8.

According to Tim Rush's direct testimony, good cause exists for tariff flexibility in GMO's DSM program management to maximize participation. The variances related to promotional practices to provide tariff flexibility are included in rule 4 CSR 240-14.030(3).

GMO's new residential Home Lighting Rebate program was not included in GMO's most recent Chapter 22 Electric Utility Resource Planning annual update filing.<sup>14</sup> According to Mr. Rush's direct testimony, the addition of this program would not result in a material change that would necessitate a change in the preferred plan selected. GMO plans to include its residential Home Lighting Rebate program in its next Chapter 22 annual update filing, in April 2015. The variance related to Chapter 22 integrated resource analysis and preferred plan is for Rule 4 CSR 240-20.094(3)(A)3.

According to Mr. Rush's direct testimony, GMO will not be able to provide its annual report information in a timely enough matter that would allow a completed filing 60 days after the end of the calendar year, as required by the MEEIA rules. Therefore, GMO is requesting a variance that would allow it 90 days following the end of the calendar year to file its year-end annual report information. This variance is for Rule 4 CSR 240-20.093(8).

### **3<sup>rd</sup> Revised Sheet No. R-63**

The 3<sup>rd</sup> Revised Sheet No. R-63, Canceling 2<sup>nd</sup> Revised Sheet No. R-63, includes a change in the Income Eligible Weatherization amount: from "Up to \$3,500" to "Up to \$6,500". GMO informed MPSC Staff this change was based on the Department of Energy (DOE) Weatherization Assistance Program ("WAP") Notice 14-1, effective February 25, 2014 which states:

#### 3.1.1 ADJUSTED AVERAGE COST PER DWELLING UNIT

The average per dwelling expenditure of financial assistance provided under WAP for labor, weatherization materials, and related matters cannot exceed \$6,500, as adjusted (see, 10 CFR §440.18(a) and (c)). The adjusted annual average for 2014 is determined by using the percentage increase in the Consumer Price Index (CPI) (all items, United States city average) for 2013 or 3 percent, whichever is less. The percentage increase in the CPI for the previous 12-month period (September 2012-September 2013) was 1.2%, so a 1.2% increase was applied to the PY 2013 adjust average at \$6,904. So the adjusted average expenditure limit<sup>15</sup> for PY 2014 is **\$6,987. This average includes units computed in a multi-family building of 5 units or greater.** [Emphasis added]

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<sup>14</sup> File No. EO-2014-0257

<sup>15</sup> The 1<sup>st</sup> Revised Sheet No. R-63.02 states "E. Program Grants: The total amount of grants offered to a qualifying Customer will be defined in the agreement between the Company and the Social Service Agency using established criteria for Income-Eligible Weatherization. The average expenditure per Customer in each program year shall not exceed the Adjusted Average Expenditure Limit for weatherization determined by the U.S. Department of Energy that is applicable for the month that the weatherization is completed."

MPSC Staff reviewed the DOE Weatherization Grant Guidance and the existing tariff 1<sup>st</sup> Revised Sheet No. R-63.02. On June 25, 2014 MPSC Staff and GMO discussed the rationale for the change. Staff agrees with this change as it is consistent with the existing tariff, follows the Weatherization Grant Guidance, and does not constitute a program design change.

**Staff Recommendation**

As a result of its review, Staff finds that GMO has complied with paragraph 9 of the Non-Unanimous Stipulation and Agreement in Case No. EO-2014-0095. Staff recommends that the Commission approve: 1) GMO's proposed residential Home Lighting Rebate program which has a budget of \*\* \_\_\_\_\_ \*\*; 2) the program's cumulative annual energy and demand savings targets of 25,162,228 kWh and 2,673 kW, respectively, 3) the modified GMO MEEIA program plan's cumulative annual energy and demand savings targets of 161,280,888 kWh and 66,525 kW, respectively, and 4) all variances to the Commission's Rules requested in GMO's application. Further, Staff recommends expedited treatment of the following tariff sheets, so that each tariff sheet becomes effective July 6, 2014:

**P.S.C. MO. No. 1**

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11th Revised Sheet No. R-3, Cancelling 10th Revised Sheet No. R-3  
3rd Revised Sheet No. R-63, Cancelling 2nd Revised Sheet No. R-63  
1st Revised Sheet No. R-63.01, Cancelling Original Sheet No. R-63.01  
Original Sheet No. R-64.21

Staff has verified that GMO has filed its 2013 annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

1. **Current Targets** were approved in S&A in Case No. EO-2012-0009; 37,521 MW target is on Original Sheet No. R-63.01.
2. **Corrected Targets** are on Exhibit 2 and represent correction of errors to the S&A in Case No. EO-2012-0009 as identified during review of this filing.
3. **Revised Targets** are on Exhibit 2 and include impact of Home Lighting Rebate program.

### **Corrected Targets vs. Current Targets**

	<b>Cumulative Annual Energy Savings Target</b>	<b>Cumulative Annual Demand Savings Target</b>
<b>Current Targets</b>	150,346,738	37,521
<b>Corrected Targets</b>	136,118,660	63,852
<b>% Change</b>	90.54%	170.18%
<b>Target Weights in DSIM</b>	80.00%	20.00%
<b>Weighted % Change</b>	72.43%	34.04%
<b>Total Weighted % Change</b>	106.46%	

### **Revised Targets vs. Corrected Targets**

	<b>Cumulative Annual Energy Savings Target</b>	<b>Cumulative Annual Demand Savings Target</b>
<b>Corrected Targets</b>	136,118,660	63,852
<b>Revised Targets</b>	161,280,888	66,525
<b>% Change</b>	118.49%	104.19%
<b>Target Weights in DSIM</b>	80.00%	20.00%
<b>Weighted % Change</b>	94.79%	20.84%
<b>Total Weighted % Change</b>	115.63%	

### **Revised Targets vs. Current Targets**

	<b>Cumulative Annual Energy Savings Target</b>	<b>Cumulative Annual Demand Savings Target</b>
<b>Current Targets</b>	150,346,738	37,521
<b>Revised Targets</b>	161,280,888	66,525
<b>% Change</b>	107.27%	177.30%
<b>Target Weights in DSIM</b>	80.00%	20.00%
<b>Weighted % Change</b>	85.82%	35.46%
<b>Total Weighted % Change</b>	121.28%	

In the above analysis, **Total Weighted % Change** values greater than 100% are an indication that the change in targets will require greater overall cumulative annual energy and demand savings through EM&V in order for GMO to receive any given performance award amount.



Highlighted 2014 and 2015 amounts are corrected to be incremental annual savings

Highlighted corrected and revised cumulative annual energy and demand savings targets

**Incremental annual energy savings (kWh) and cumulative annual energy savings (kWh)**

<b>Program</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>Cumulative</b>
Residential Lighting & Appliance	1,250,047	2,571,764	2,617,676	6,439,487
Multi-Family	833,364	1,714,509	1,745,118	4,292,991
Energy Star New Homes	1,264,882	1,285,882	1,308,838	3,859,602
Cool Homes	6,398,183	6,632,546	6,890,465	19,921,194
Home Performance with Energy Star	2,108,136	2,143,137	2,181,397	6,432,670
Income-Eligible Weatherization	421,627	428,627	436,279	1,286,533
Appliance Recycling	400,015	822,964	837,656	2,060,635
C&I Prescriptive Rebates	4,166,822	8,572,547	8,725,588	21,464,957
C&I Custom Rebates	19,394,851	19,716,858	20,068,853	59,180,562
Energy Optimizer	0	0	0	0
MPower	0	0	0	0
Business Energy Analyzer	0	0	0	0
Home Energy Analyzer	0	0	0	0
Residential Reports	3,048,049	8,131,980	0	11,180,029
Building Operator Certification	0	0	0	0
Corrected Annual Energy Savings	39,285,976	52,020,814	44,811,870	136,118,660
Home Lighting Rebates	0	9,582,031	15,580,197	25,162,228
Revised Annual Energy Savings	39,285,976	61,602,845	60,392,067	161,280,888

**Incremental annual demand savings (kW) and cumulative annual demand savings (kW)**

<b>Program</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>Cumulative</b>
Residential Lighting & Appliance	636	1,308	1,331	3,275
Multi-Family	56	115	117	288
Energy Star New Homes	386	392	399	1,177
Cool Homes	3,743	3,882	4,036	11,661
Home Performance with Energy Star	971	988	1,005	2,964
Income-Eligible Weatherization	30	30	31	91
Appliance Recycling	0	60	61	121
C&I Prescriptive Rebates	858	1,765	1,796	4,419
C&I Custom Rebates	2,634	2,678	2,726	8,038
Energy Optimizer	2,977	2,822	2,662	8,461
MPower	14,308	3,824	3,505	21,637
Business Energy Analyzer	0	0	0	0
Home Energy Analyzer	0	0	0	0
Residential Reports	469	1,251	0	1,720
Building Operator Certification	0	0	0	0
Corrected Annual Demand Savings	27,068	19,115	17,669	63,852
Home Lighting Rebates	0	1,018	1,655	2,673
Revised Annual Demand Savings	27,068	20,133	19,324	66,525

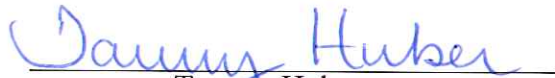
**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

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

**AFFIDAVIT OF TAMMY HUBER**

**STATE OF MISSOURI**    )  
                                  ) ss  
**COUNTY OF COLE**     )

Tammy Huber of lawful age, on oath states: that she participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to her; that she has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of her knowledge and belief.

  
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Tammy Huber

Subscribed and sworn to before me this 26<sup>th</sup> day of June, 2014.

<p style="text-align:center">LAURA BLOCH Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 21, 2015 Commission Number: 11203914</p>
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\_\_\_\_\_  
Notary Public

**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 Its Demand- )  
Side Programs )

Case No. EO-2014-0355

**AFFIDAVIT OF JASON HUFFMAN**

**STATE OF MISSOURI** )  
 ) ss  
**COUNTY OF COLE** )

Jason Huffman, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
Jason Huffman

Subscribed and sworn to before me this 26<sup>th</sup> day of June, 2014.

LAURA BLOCH  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: June 21, 2015  
Commission Number: 11203914

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

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

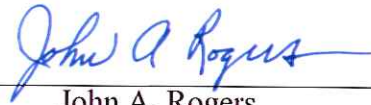
In the Matter of KCP&L Greater Missouri )  
Operations Company's Application for )  
Approval of Modifications to Its Demand- )  
Side Programs )

Case No. EO-2014-0355

**AFFIDAVIT OF JOHN A. ROGERS**

STATE OF MISSOURI    )  
                                  ) ss  
COUNTY OF COLE     )

John A. Rogers, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



\_\_\_\_\_  
John A. Rogers

Subscribed and sworn to before me this 26<sup>th</sup> day of June, 2014.

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