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

In the Matter of the Application of Aquila, Inc.	)	
d/b/a KCP&L Greater Missouri Operations	)	Case No. ER-2009-0090
Company, for Approval to Make Certain	)	
Changes in its Charges for Electric Service.	)	

# CITY OF KANSAS CITY'S STATEMENT OF POSITION

Comes now the City of Kansas City (Kansas City), by and through counsel, and submits this statement of position on the list of issues filed by the parties in this case on April 14, 2009:

### **Demand Side Management**

ISSUE 10.d.: Should the weatherization program be modified so that GMO's Call Center will refer customers to the program?

Historically, the City secures weatherization applicants to participate in the program and then refers those applicants to the participating utility, like GMO, for approval based on the applicant's record of energy consumption. Following those steps, the participating utility must then return the approved applicant list to the City for further processing. It is the City's position that the program would progress more efficiently if GMO's call center would first refer applicants to the program.

ISSUE 10.e.: Should LIHEAP recipients be directed to the weatherization program and be required to participate in it?

As Mr. Robert T. Jackson explains in his filed testimony, utility service assistance is made available annually through the Missouri Department of Social Services with federal Low Income Home Energy Assistance Program funds (LIHEAP). The recipients of these funds must

work directly with the utility that provides them service. There are LIHEP recipients who regularly receive service from GMO who can benefit from the City/GMO weatherization program. If LIHEAP recipients were directed to the City/GMO weatherization program the pressure on the LIHEAP program would reduce and open the way for new applicants for those dollars. The City proposes that with respect to LIHEAP recipients who are also GMO customers, GMO can be a coordinator in directing those customers for weatherization services through the City/GMO partnership. Adding GMO's coordination to the weatherization referral process would greatly increase the utilization level of both programs.

Kansas City takes no position on the other issues set out by the parties, without impairment of its right to brief and argue those issues to the Commission as the evidence may unfold at hearing.

Respectfully submitted,

#### /s/ Mark W. Comley

Mark W. Comley #28847 NEWMAN, COMLEY & RUTH P.C. 601 Monroe Street, Suite 301 P.O. Box 537 Jefferson City, MO 65102-0537 (573) 634-2266 (573) 636-3306 (FAX)

Attorneys for City of Kansas City, Missouri

### Certificate of Service

	I hereby	certify t	hat a tru	e and	correct	copy	of the	above	and	foregoing	document	was
sent v	ia email or	n this 15 <sup>t</sup>	<sup>h</sup> day of A	April,	2009, to	all pa	rties o	f record	1.			

/s/ Mark W. Comley
Mark W. Comley