

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of the Application of Kansas City )  
Power and Light Company for Approval to Make )  
Certain Changes in its Charges for Electric ) Case No. ER-2009-0089  
Service to Continue the Implementation of its )  
Regulatory Plan )

**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 13, 2009:

**Demand Side Management**

ISSUE 6.d.: Should the weatherization program be modified so that KCPL'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 KCPL for approval based on the applicant's record of energy consumption. Following those steps, KCPL 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 KCPL's call center would first refer applicants to the program.

ISSUE 6.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 KCPL who can benefit from the City/KCPL weatherization

program. If LIHEAP recipients were directed to the City/KCPL 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 KCPL customers, KCPL can be a coordinator in directing those customers for weatherization services through the City/KCPL partnership. Adding KCPL'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

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 15<sup>th</sup> day of April, 2009, to all parties of record

/s/ Mark W. Comley