

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

In the Matter of a Proposed Tariff for Change A)	
Light Program to be Implemented as a Part of the)	Case No. EO-2006-
Experimental Regulatory Plan of Kansas City Power)	
& Light Company)	

STAFF RECOMMENDATION

Comes now the Staff of the Missouri Public Service Commission (Staff) and submits the attached Staff Recommendation (Appendix A) requesting that the Missouri Public Service Commission (Commission) approve the tariff sheet filed on September 1, 2005 by Kansas City Power & Light Company (KCPL) to implement a Change A Light Program consistent with the terms of the KCPL Experimental Regulatory Plan approved by the Commission in Case No. EO-2005-0329. The tariff sheets for which Commission approval is sought have an effective date of October 1, 2005, and are only for the first year of a likely multi-year energy efficiency program. The program which is recommended for Commission approval was reviewed by the Customer Programs Advisory Group (CPAG). The CPAG has been meeting so as to review and advise KCPL regarding the committing to tariff sheets of the Demand Response, Efficiency and Affordability Programs contemplated by the KCPL Experimental Regulatory Plan. The Change A Light Program proposed by KCPL is similar to the Change A Light Program previously proposed by Union Electric Company, d/b/a AmerenUE, and approved by the Commission.

Wherefore the Staff requests that the Commission approve the tariff sheet filed by Kansas City Power & Light Company with an effective date of October 1, 2005 to effectuate the first year of a Change A Light Program.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/Steven Dottheim

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 26th day of September 2005.

/s/ Steven Dottheim

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EO-2006- , File No. YE-2006-0157
Kansas City Power & Light Company

FROM: James Watkins, Manager, Economic Analysis, Project Coordinator
Henry Warren, Regulatory Economist II
Mack McDuffey, Rate & Tariff Examiner II

/s/ Mack McDuffey/ 9-26-05 /s/ Steven Dottheim/ 9-26-05
Energy Department / Date General Counsel's Office / Date

SUBJECT: Staff Recommendation For **Approval** of Tariff Sheet Filed To Implement A
Missouri Change A Light Program Under KCPL's Experimental Regulatory Plan

DATE: September 23, 2005

On September 1, 2005, Kansas City Power & Light Company (KCPL or Company) of Kansas City, Missouri, filed with the Missouri Public Service Commission (Commission) one (1) tariff sheet with a proposed effective date of October 1, 2005 to implement a "Missouri Change A Light Program" (Program) pursuant to the Demand Response, Efficiency and Affordability Programs section of the Stipulation and Agreement which comprises the Experimental Regulatory Plan approved by the Commission in its July 28, 2005 Report And Order in Case No. EO-2005-0329.

The filing of KCPL requests Commission approval of KCPL's participation in the initial year of a "Missouri Change A Light Program". KCPL's participation in the Demand Response, Efficiency and Affordability Programs is a significant part of the Experimental Regulatory Plan. The following Signatory Parties to the Experimental Regulatory Plan acting as an advisory group (Customer Programs Advisory Group or CPAG) to KCPL have met and agreed to recommend the approval of the Program:

1. Mo. PSC Staff
2. Office of the Public Counsel
3. Department of Natural Resources, Energy Center
4. Praxair, Inc.
5. City of Kansas City
6. The Empire District Electric Company

The objective of the Program is to encourage the replacement of inefficient energy consuming lights by providing a rebate for a portion of the costs of Energy Star[®] compact fluorescent light (CFL) bulbs. The Program is designed to educate consumers on the energy and money saving benefits of CFL bulbs, torchiere lamps and other Energy Star[®] products through marketing and media outreach efforts as well as offer an instant rebate towards the purchase of an Energy Star[®] lighting product. Energy Star[®] is a label awarded for energy efficiency.

The Customer Programs Advisory Group has recommended, and KCPL has proposed with this tariff filing, implementing the "Missouri Change A Light Program" for the first year of a five year plan. The overall budget for Missouri for year one will be \$60,000. Pursuant to the Change A Light Campaign for 2005, consumers will be offered a \$2.00 instant rebate on the purchase of CFL bulbs.

KCPL will provide \$1.45 to \$1.50 towards the rebate not to exceed \$35,000 in total for year one, and participating manufacturers will contribute an additional \$0.50 to \$0.55 towards the rebate. KCPL anticipates their consumers will purchase 22,012 CFL bulbs for the 2005 campaign which will be administered by Midwest Energy Efficiency Alliance (MEEA). The Program will conclude on December 31, 2005 or when the Program's funds for bulbs or the Program's bulbs are depleted, whichever occurs first. At the conclusion of the Program, MEEA will conduct an evaluation of the Program that will include a quantification of the energy saving specific to KCPL, the lessons learned from the Program and recommendations for next year's Program.

The Commission's Energy Department Staff (Staff) has reviewed the filed tariff sheet, and is of the opinion that it was filed in a timely manner and is in compliance with the Commission's Report And Order. The Company has provided the supporting information required by 4 CSR 240-3.150 (3) for Promotional Practices tariff filings. Staff therefore recommends that the Commission issue an order approving the following proposed tariff sheet, as filed on September 1, 2005, to become effective on October 1, 2005, as requested in KCPL's cover letter:

P.S.C. MO. No. 7
Original Sheet No. 43E

The Staff has verified that this Company is not delinquent on any assessment or the filing of its annual report. Each of the other three investor-owned electric companies under the Commission's jurisdiction has filed or will file similar tariff sheets to engage in Change A Light Programs. The following electric cases involving KCPL are also before the Commission at this time:¹

EE-2006-0123

EF-2004-0512

EO-2000-210

EF-2005-0498

EO-2004-0590

EO-2006-0094

¹ This company may provide other types of utility services in Missouri; however, only pending electric cases are listed.