Exhibit No.:

Issue: Affordability, Energy Efficiency, and

Demand Response Programs; CPAG

Update; Credit Card Program

Witness: Allen D. Dennis

Type of Exhibit: Direct Testimony
Sponsoring Party: Kansas City Power & Light Company
Case No.: ER-2009-____

Date Testimony Prepared: September 5, 2008

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. ER-2009-____

DIRECT TESTIMONY

OF

ALLEN D. DENNIS

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

Kansas City, Missouri September 2008

DIRECT TESTIMONY

OF

ALLEN D. DENNIS

Case No. ER-2009-____

| 1 | Q: | Please state your name and business address. |
|----|----|-------------------------------------------------------------------------------------------|
| 2 | A: | My name is Allen D. Dennis. My business address is 1201 Walnut, Kansas City, |
| 3 | | Missouri 64106-2124. |
| 4 | Q: | By whom and in what capacity are you employed? |
| 5 | A: | I am employed by Kansas City Power & Light Company ("KCP&L") as Director, |
| 6 | | Products and Services. |
| 7 | Q: | What are your responsibilities? |
| 8 | A: | My responsibilities include providing leadership and direction to the Energy Efficiency, |
| 9 | | Demand Response, Market Competitiveness, and Market Intelligence Teams. My duties |
| 10 | | include initiating and bringing to market new products, as well as improvements and |
| 11 | | innovations to existing affordability, energy efficiency, and demand response programs |
| 12 | | products and services. |
| 13 | Q: | Please describe your education, experience and employment history. |
| 14 | A: | I graduated from Colorado State University with a Bachelor of Science degree in |
| 15 | | Mechanical Engineering in 1981. I have 25 years of experience in the electric and natural |
| 16 | | gas industry. I was first employed at KCP&L in 2004 as the Manager, Market |
| 17 | | Management. In this capacity, I managed KCP&L's Energy Consultants, and |
| 18 | | Commercial and Residential Sales functions. Prior to my employment at KCP&L, I |
| 19 | | served as a Director in the Enterprise Consulting Division for Black & Veatch and was |

1 responsible for the energy practice and consulting with clients on integrated resource 2 plans, risk management and operational improvements. Additionally, I was Executive 3 Vice President and co-founder of Enserco Energy, an energy trading, marketing, and 4 services company, and co-founder and board member of Hometown Connections, a 5 company focused on offering products and services to public power utilities. Prior to 6 Enserco Energy, I served as Director, Power Marketing for KN Energy, where I formed 7 the electric trading and marketing area. I began my utility career at Public Service 8 Company of Colorado and, over the course of 14 years, held various positions including 9 marketing engineer, marketing project specialist, manager of electric wholesale and **10** cogeneration markets, and manager of bulk power business development. 11 Q: Have you previously testified in a proceeding at the Missouri Public Service 12 Commission ("MPSC") or before any other utility regulatory agency? 13 No, I have not. A: 14 What is the purpose of your testimony? Q: 15 The purpose of my testimony is to provide a progress report on the development and A: **16** implementation of KCP&L's Affordability, Energy Efficiency, and Demand Response **17** programs. For these programs, I will provide an update explaining what steps KCP&L 18

has taken thus far with respect to these initiatives, including program participation and

expenditures through December 31, 2007 and program updates through June 30, 2008. I

will also provide an update regarding the Customer Program Advisory Group ("CPAG")

activities, meetings and initiatives and an update on developments in the implementation

of our credit card payment program.

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| 1 | Q: | What did the Regulatory Plan Stipulation and Agreement in Case No. EO-2005- |
|----|----|-------------------------------------------------------------------------------------------|
| 2 | | 0329 ("Regulatory Plan Stipulation") provide concerning KCP&L's Affordability, |
| 3 | | Energy Efficiency and Demand Response programs? |
| 4 | A: | The filed and effective date of each program tariff and its associated approved budget is |
| 5 | | outlined in Schedule ADD-1. |
| 6 | Q: | What were those programs? |
| 7 | A: | There were two proposed Affordability programs, eight proposed Energy Efficiency |
| 8 | | programs, two proposed Demand Response programs, and one proposed additional |
| 9 | | funding area. Specifically, the proposed programs are as follows: |
| 10 | | Affordability |
| 11 | | Affordable New Homes (New Construction); and |
| 12 | | Low-Income Weatherization. |
| 13 | | Energy Efficiency |
| 14 | | Residential: |
| 15 | | • Online Energy Information (Home Energy Analyzer); |
| 16 | | • Home Performance with ENERGY STAR®; |
| 17 | | • Change a Light; |
| 18 | | Cool Homes Program (High Efficiency Cooling Rebates); and |
| 19 | | • ENERGY STAR® New Homes (New Construction). |
| 20 | | Commercial/Industrial ("C&I"): |
| 21 | | Online Energy Information and Analysis (Business Energy Analyzer); |
| 22 | | Energy Audit and Energy Saving Measures Rider; and |
| 23 | | Building Operator Certification (Training). |

| 1 | Demand | Res | ponse: |
|---|--------|-----|--------|
| | | | |

- Residential, Small and Medium General Service Air Conditioner Cycling Rider
 Energy Optimizer Program (Energy Optimizer); and
- The Alliance, an Energy Partnership (C&I Curtailment MPower).
- 5 The funding area is for Demand-Side Management ("DSM") research.
- 6 Q: Could you please describe the programs and provide an update as to the status of
 7 their implementation?
- 8 A: Yes, the following is a program-by-program description, including the status of each9 program.

Affordable New Homes (New Construction):

The Affordable New Homes program is designed to be a partnership between KCP&L and organizations to achieve qualifying energy efficient affordable new housing for the low-income community. Financial incentives will be available up to \$800 for the incremental cost for high efficiency cooling systems, either central air conditioners or heat pumps. An incentive of up to \$200 will be available toward the purchase of an ENERGY STAR® rated refrigerator, up to \$100 for the purchase of ENERGY STAR® rated lighting fixtures and up to \$400 for additional attic, floor or crawlspace insulation.

The tariff for this program became effective February 12, 2007. There has been no participation to date in the Affordable New Homes program and 17% of the budget was spent program to date ending 2007. Due to lack of interest in this program, KCP&L is considering modifications to the program. KCP&L continues to seek feedback from Community Action Program ("CAP") agencies regarding the program.

Low-Income Weatherization Program:

Qualified lower income customers can get help managing their energy use and bills through KCP&L's Low-Income Weatherization program. The program works directly with local CAP agencies that already provide weatherization services to low income customers. KCP&L will provide supplemental funds to the CAPs to cover the cost of additional cost-effective weatherization measures. KCP&L residential customers in owner-occupied one to four-unit structures with income up to 185% of the federal poverty guidelines may participate. Renters are allowed to participate if the landlord pays 50% of the weatherization cost and agrees not to raise the rent for a pre-agreed period of time.

To improve the process of referring potential applicants to the Low-Income Weatherization program, KCP&L developed a list of its customers who received third-party assistance in paying their bills and who met other weatherization eligibility requirements. KCP&L sent a letter to these customers informing them of the availability of the program in the event they or someone they know may be interested. We will continue to work with the City of Kansas City, Missouri's ("Kansas City") Neighborhood and Community Services Department and CAP agencies to market this program. In addition, the KCP&L Customer Service Center and KCP&L's Credit and Collections department are informing customers of the availability of this service. Kansas City has been engaged to improve the participation levels of the program, since the majority of the budget is contractually obligated to the city's program. Since that time, the support staffing of the city has been doubled in critical areas designed to improve the efficiency of the process. Additionally, KCP&L is increasing its promotion of the program through

CAP agencies to help create an awareness and education of the benefits of weatherization.

The tariff for this program became effective December 1, 2005. There was 31% of the participation target in the Low-Income Weatherization program and 59% of the budget was spent program to date ending 2007.

Home Energy Analyzer:

The Home Energy Analyzer provides information to customers on how they use energy based on their specific usage data. It also provides information on ways customers can save energy and what their payback might be based on the improvements made.

KCP&L is looking to this program to be the "starting point" and "direction provider" for customers. Customers come to the Energy Analyzer site and, based on their needs and interests, get routed to various programs that may be of benefit to them.

The tariff for this program became effective December 21, 2005. There was 302% of the participation target in the Home Energy Analyzer program and 103% of the budget was spent program to date ending 2007.

Home Performance with ENERGY STAR®:

Home Performance with ENERGY STAR® ("HPwES") enhances the traditional home energy audit service and uses the ENERGY STAR® brand to help encourage and facilitate whole-house energy improvements. The Missouri Department of Natural Resources ("MDNR") is sponsoring a statewide HPwES program. KCP&L will coordinate with MDNR and the Metropolitan Energy Center ("MEC") to implement an effective HPwES program regionally. The State of Kansas is also participating in this coordinated effort. KCP&L will focus specifically on the marketing, customer

incentives, and program evaluation portion of the partnership. This program received approval on January 23, 2008. To date, KCP&L has paid nine rebates to customers

Change a Light ("CAL"):

This program provides rebates for compact fluorescent lights ("CFLs") at point of purchase in specific stores and is administered by the Midwest Energy Efficiency Alliance ("MEEA"). CAL requires tariff approval each year.

Program approvals occurred October 1, 2005, September 28, 2006, and September 30, 2007. There was 79% of the participation target in the CAL program and 88% of the budget was spent program to date ending December 2007. The results of the 2007 CAL program year were provided to KCP&L in a report from the program vendor MEEA in 2008. During the 2007 program year, KCP&L achieved 96% of its annual goal for Change a Light and spent 78% of it's "year-3" program budget.

An independent two-year impact and process evaluation of the CAL program was completed in second quarter 2008 by Opinion Dynamics Incorporated ("ODC"). The evaluation results focused on the 2005 and 2006 years of the program and found the savings estimates per CFL closely resembled the savings estimates KCP&L had originally projected. However, lower program performance during the program's first year startup impacted the combined savings that could be claimed for the program.

To enhance the cost effectiveness of the program and ensure more CFL's will enter the market, changes to the program are being considered that would allow for year-round distribution of CFL's. This would be achieved by reducing the number of CFL contribution with MEEA and using the remainder of the budget to purchase and allocate CFL's for KCP&L distribution targeted at specific events throughout the year. It is

estimated that up to 5,000 additional CFL's would enter the market using the same program budget under this approach.

Cool Homes Program:

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This program is designed to incent customers to install high efficiency cooling equipment, before failure, to maximize energy savings benefit. Early replacement will target replacement of Seasonal Energy Efficiency Ratio ("SEER") 6 to 8 equipment with SEER 14 or higher equipment. KCP&L has redesigned the program as a recommissioning/early replacement program in place of the original program design. Originally, the program threshold was a rating of SEER 13 or higher based upon a minimum standard efficiency rating of SEER 10; however, the minimum federal standard efficiency for manufacturing cooling equipment was increased to SEER 13 in January 2006, so the program threshold was raised to a minimum of SEER 14. Proper installation measures are required as part of the program, wherein all installations under the program must utilize CheckME![™], a software program that ensures quality installation through proper charging of the refrigerant and airflow over evaporator coils, while the contractor is at the premise. Those who request and receive a cooling system evaluation also receive CFLs, adding to the savings achieved through this program. KCP&L issued a Request for Proposal, evaluated the bids, requested four bidders make a presentation, and proposed the finalist to CPAG. With input from CPAG, KCP&L prepared a tariff filing that became effective March 30, 2007. There was 60% of the participation target in the Cool Homes program and 41% of the budget was spent program to date ending 2007. Through June of 2008, the program acquired several new contractors, bringing the total number of CheckME trained contractors from 93 in December of 2007 to 248. The

number of HVAC companies has also grown from 24 companies in December 2007 to 61 in July 2008. This number is expected to grow throughout the remainder of the year as more training is scheduled. To date, the program has had a very successful year and remains above goal in the number of participants, systems replaced, recommissioning, and CFL's distributed. Of the 3,536 homes that have been visited since tariff approval, CheckMe! analysis has been performed on 3,843 systems, of which 1,403 systems have been recommissioned, and 848 air conditioners and heat pumps have been replaced with high efficiency units.

ENERGY STAR® New Homes (New Construction):

ENERGY STAR® New Homes requires that new homes be constructed to a standard at least 15 percent more energy efficient than the 2004 International Residential Code.

These savings are based on heating, cooling, and hot water energy use and are typically achieved through a combination of building envelope upgrades, high performance windows, controlled air infiltration, upgraded heating and air conditioning systems, tight duct systems, and upgraded water-heating equipment. Homes can be qualified as an ENERGY STAR® home through two different paths. The prescriptive path uses Building Option Packages which represent a set of construction specifications for a specific climate zone. The performance path qualifies the home based on a home energy rating. This program was designed in a coordinated effort between the MEC and the Kansas City Home Builders Association's ("HBA") Build Green Committee.

This program was approved in Missouri on April 6, 2008. The program was introduced during an HBA – Kansas Area Council – Are You Building Green? Luncheon with over 150 people in attendance. Shortly following, KCP&L hosted the first

1 ENERGY STAR® builders' workshop with approximately 40 people in attendance.

Currently, seven builders have committed to building ENERGY STAR® homes and 20

percent of the first year's budget has been spent.

Market Research:

KCP&L engaged several consultants to determine the market opportunity for ENERGY STAR® appliances, a refrigerator pickup program and office equipment, among other potential programs. KCP&L is currently in the process of developing these programs.

Business Energy Analyzer:

The Business Energy Analyzer ("BEA") provides information to business customers on how they use energy based on their specific usage data. It provides information on ways they can save energy and what their payback might be based on the improvements made. It also allows businesses to benchmark themselves against like businesses. Program participation goals were set based upon the significant response rate in the residential market; however, despite promotions, the commercial market has been slower to adopt the benefits of this program.

The vendor and KCP&L are working together to make improvements to the Website, and KCP&L will continue to actively promote this service. The tariff for this program became effective February 12, 2006. There was 69% of the participation target in the BEA program and 70% of the budget was spent program to date ending 2007.

Energy Audit and Energy Saving Measures Rider (Energy Savings Measures):

The Energy Audit portion of this Rider offers rebates to customers to cover 50 percent of the cost of an energy audit, up to \$300 for customers with facilities less than 25,000 square feet and up to \$500 for customers with facilities over 25,000 square feet. In order

to receive the rebate, the customer must implement at least one of the audit recommendations that qualify for a KCP&L C&I Custom Rebate.

The Energy Savings Measures portion of this Rider offers commercial and industrial customers rebates to install, replace or retrofit qualifying electric savings measures including HVAC systems, motors, lighting, pumps, etc. Custom rebates are calculated as the lesser of a buy-down to a two-year payback or 50 percent of the incremental cost.

Originally, KCP&L proposed to implement the New Construction Custom Rebate program in Year 1 and the Audit Rebate and Retrofit Custom Rebate programs in Year 2; however, due to the similarities of the programs, KCP&L decided to implement all three programs at the same time and promote them together. KCP&L tracks activities and expenditures for each program area separately. Additionally, CPAG suggested KCP&L develop and manage separate budgets for the small, medium and large C&I customers to ensure availability of opportunity and funds for all C&I customer classes.

The tariff for this program became effective July 10, 2006. There was 7% of the participation target and 71% of the program budget was spent to date ending 2007. For the New Construction program, the issue is that these projects have long lead times and require more consultation and evaluation to get to the approval stage. On the average it requires 2 months to pre-approve a project from the date it is submitted. Likewise, it takes 12 months to move the project from application to completion. Comparatively, the retrofit program requires an average of 3 months to move a project from application to completion. KCP&L is investigating those program issues and challenges.

Building Operator Certification (Training):

Building Operator Certification is a market transformation effort to train facility operators in efficient building operations and management ("O&M"), establish recognition of and value for certified operators, support the adoption of resource-efficient O&M as the standard in building operations, and create a self-sustaining entity for administering and marketing the training.

The tariff for this program became effective February 2, 2007. KCP&L has spent 54% of the program budget ending 2007. The program continues to be very well received in the industry. Three level one classes have been filled. Two of the classes have completed with attendees receiving their certification. A fourth class is planned for September 2008.

Energy Optimizer:

The Energy Optimizer program is an air conditioning cycling program by which KCP&L can reduce residential and small commercial air conditioning load during peak summer days. This load reduction is achieved by sending a paging signal to a control device in a thermostat attached to the customer's air conditioner. The control device then turns the air conditioner off and on or ramps up the temperature over a period of time depending on the load reduction strategy established by KCP&L.

Through a bidding process, Honeywell Utility Solutions was selected to partner with KCP&L in implementing this program. Honeywell has opened an office in Kansas City and hired office and field personnel to ensure the success of the program. Various methods of marketing the program have been implemented including Website, bill inserts, direct mail, trade show and festival participation, news releases, short vignettes

on several news and talk show programs, customer on-site presentations, and interviews on radio talk shows.

Honeywell's current thermostat serves single-stage systems and not the double-stage systems often used in commercial applications. A *beta* testing of the next generation UtilityPro 8000 thermostat is being conducted. This thermostat will handle multi-stage commercial equipment, and have the ability to keep the system fan running. This will allow KCP&L to make inroads into the commercial market.

The tariff for this program became effective October 14, 2005. There was 158% of the participation target in the Energy Optimizer program and 196% of the budget was spent program to date ending 2007.

MPower:

MPower is a C&I curtailment program whereby customers with the ability to curtail 25 kW or more are incented to contract with KCP&L to curtail their load when requested by KCP&L. Under MPower, the customer is invited to use the curtailment method(s) that best meets their capabilities and needs. This could include turning on a back-up generator, shutting off lights or production lines, raising their cooling system temperature several degrees, or stopping operations and sending their employees home.

MPower was redesigned in January of 2007 based on feedback obtained from customers. The program has grown at a very rapid pace since then. KCP&L contracted with an outside vendor, Energy Curtailment Specialists, Inc. ("ECS") of Buffalo, New York, to help promote the product to our small and mid-size commercial and industrial customers.

1 The tariff for this program became effective March 8, 2006. There was 66% of 2 the participation target in the MPower program and 45% of the budget was spent program 3 to date ending 2007. 4 Q: Have any evaluations been completed to date on the programs KCP&L has 5 implemented and, if so, what were the results of those evaluations? 6 A: ODC performed a process-based survey and impact evaluation on the Energy Optimizer 7 program. The load reduction analysis found that the program does produce substantive 8 and measurable effects on the air condition load during control periods. The evaluation 9 showed, for a moderate cycling approach (50% cycling, e.g., 15 minutes on and 15 **10** minutes off), a decrease of 1.04 kW for each hour of control for a single family house and 11 0.48 kW for multi-family home. It is KCP&L's intent to re-run the benefit-cost analysis 12 and, based on the analysis results and conversations with CPAG, provide a 13 recommendation on the future of this program. 14 Q: Are there other circumstances that may impact the budget? 15 Yes. For example, as I noted earlier in my testimony, the Cool Homes program design A: **16** was changed due to changes in Federal regulations that required all new cooling systems **17** manufactured to be a minimum of SEER 13. Therefore, rather than providing a rebate 18 for equipment replacement at failure, the program was redesigned to be a 19 re-commissioning and early replacement program, requiring a higher incentive for the **20** latter. Another example is higher than expected market demand for our programs. 21 Demand for the Energy Optimizer, for example, was so high that a three-year goal was 22 actually accomplished in 14 months. This depleted the budget much sooner than

expected. The total costs, and the proposed allocation by state, are also detailed in

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Appendix C to the Regulatory Plan Stipulation. The MPower program is also now accelerating, and the number of customers signing five-year contracts is much greater than initially projected. Therefore, we are at the point that, while our current budget will cover outflows of payments to customers for the next couple of years, it will not cover future obligations extending out beyond five years.

Is KCP&L requesting any additional programs?

Yes, KCP&L is requesting two additional programs, an Economic Relief Pilot Program
 ("ERPP") and Supplemental Weatherization and Minor Home Repair.

Q: Please describe each of these new programs.

Q:

A:

The ERPP is a program designed to deliver energy affordability benefits to KCP&L qualifying low-income residential customers. This Program delivers a \$50 per month "fixed credit" to low-income customers in an effort to improve low-income home energy affordability. ERPP will be operated by KCP&L in order to generate affordable home electric bills to ERPP participants, thus allowing those participants to make full and timely payments on their monthly bills. Based on 1,000 participants, the annual proposed budget is \$630,000. Company witness Chris Giles includes in his Direct Testimony a request that 50% of the costs of the program be deferred until KCP&L's next rate case and considered at that time.

The proposed Supplemental Weatherization and Minor Home Repair Program is intended to assist qualified residential customers in reducing their energy usage by weatherizing their home. Efficiency efforts include insulation enhancements, infiltration reduction, heating and cooling service, lighting upgrades, installation of setback thermostats and energy efficiency education. Home repair efforts include hazards,

including installation of smoke alarms and CO₂ detectors. Replacement of basic systems includes heating, electrical, plumbing, and roofing when considered an immediate health / safety risk or emergency repair.

The program will be administered by KCP&L and implemented by qualified weatherization and home repair contractors. KCP&L will work collaboratively with agencies to develop this program. Based on 100 weatherization participants and 100 minor home repair participants, the annual proposed budget is \$1,190,000. KCP&L has not proposed cost recovery in this rate case, but rather will collaborate with the Staff and the Office of Public Council on cost recovery and other aspects of the program.

- 10 Q: Does KCP&L meet regularly with CPAG?
- 11 A: Yes.

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- 12 Q: Is CPAG aware of all the issues associated with each program's design and
- projected implementation timeline?
- 14 A: Yes, KCP&L keeps CPAG advised and CPAG members are generally knowledgeable
 15 about all the issues associated with program rollout, cost-effectiveness analysis,
 16 evaluations, and other program-related issues. CPAG has been an excellent collaborative
 17 team with thoughtful participation by all.
- 18 Q: How active has CPAG been?
- A: CPAG has been very active and supportive. Since the CPAG inception in 2006, we have met approximately every 6-8 weeks. We are very appreciative of CPAG's support and their contributions have been instrumental in our success.
- Q: Could you please provide an update of KCP&L's implementation of its credit card payment program?

| 1 | A: | KCP&L began offering credit card payment options to its residential customers in 2007, |
|----|----|----------------------------------------------------------------------------------------|
| 2 | | beginning with acceptance through the interactive voice response system ("IVR") and |
| 3 | | one-time payments through the KCP&L Website. In February, 2008, the Company |
| 4 | | began offering a recurring card payment option with enrollment through its Website. |
| 5 | | KCP&L has contracted with Western Union to act as a payment processor to help ensure |
| 6 | | that customer card information is handled, processed and stored securely. Western |
| 7 | | Union, through its SpeedPay system, is one of the largest processors of credit card |
| 8 | | payments in the United States. |
| 9 | Q: | What does KCP&L estimate its annualized credit card payment program costs will |
| 10 | | be as of March 31, 2009? |
| 11 | A: | We expect our annualized costs at that time to be \$517,000 and Adj. 56 on Schedule |
| 12 | | JPW-2 for \$144,475 (total company) attached to the Direct Testimony of Company |
| 13 | | witness John Weisensee reflects this projected cost. |
| 14 | Q: | Does that conclude your testimony? |

15

A:

Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of the Application of Kansas City Power & Light Company to Modify Its Tariff to Continue the Implementation of Its Regulatory Plan Continue the Implementation of Its Regulatory Plan | | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|--|
| AFFIDAVIT OF ALLEN D. DENNIS | | | | | |
| STATE OF MISSOURI)) ss | | | | | |
| COUNTY OF JACKSON) | | | | | |
| Allen D. Dennis, being first duly sworn on his oath, states: | | | | | |
| 1. My name is Allen D. Dennis. I work in Kansas City, Missouri, and I am | | | | | |
| employed by Kansas City Power & Light Company as Director, Products and Services. | | | | | |
| 2. Attached hereto and made a part hereof for all purposes is my Direct Testimony | | | | | |
| on behalf of Kansas City Power & Light Company consisting of Seventeen (17) pages, having | | | | | |
| been prepared in written form for introduction into evidence in the above-captioned docket. | | | | | |
| 3. I have knowledge of the matters set forth therein. I hereby swear and affirm that | | | | | |
| my answers contained in the attached testimony to the questions therein propounded, including | | | | | |
| any attachments thereto, are true and accurate to the best of my knowledge, information and | | | | | |
| belief. | | | | | |
| Allof. frus | | | | | |
| Allen D. Dennis | | | | | |
| Subscribed and sworn before me this 5th day of August 2008. | | | | | |
| Notary Public | | | | | |
| My commission expires: Tub. 4 20 Notary Tuble Notary SEAL Nicole A. Wehry, Notary Public Jackson County, State of Missouri My Commission Expires 2/4/2011 Commission Number 07391200 | | | | | |

PROGRAM UPDATE MISSOURI

| PROGRAM | Tariff Filed | Tariff Effective | Approved Budget (\$) |
|---------------------------------|--------------|---------------------|-------------------------|
| Affordability Programs | | | |
| Affordable New Homes | 01/12/07 | 02/12/07 | 295,500 |
| Low Income Weatherization | 11/01/05 | 12/01/05 | 2,870,500 |
| Energy Efficiency - Residential | | | |
| Home Energy Analyzer | 11/21/05 | 12/21/05 | 1,121,900 |
| Home Performance w/ Energy Star | 12/17/07 | 01/23/08 | 707,500 |
| Change a Light (2005) | 09/01/05 | 10/01/05 | 762,500 |
| Change a Light (2006) | 09/01/06 | 09/28/06 | ** |
| Change a Light (2007) | 08/30/07 | 09/30/07 | ** |
| Cool Homes | 02/28/07 | 03/30/07 | 9,629,491 |
| Energy Star Homes | 03/07/08 | 04/06/08 | 6,105,000 |
| PAYs type Program | | Not Filed | 525,000 |
| Energy Efficiency – C&I | | | |
| Business Energy Analyzer | 01/12/06 | 02/12/06 | 758,700 |
| C&I Audit | 05/30/06 | 07/03/06 | 7,372,500 |
| Building Operator Certification | 01/02/07 | 02/02/07 | 525,000 |
| Demand Response | | | |
| Energy Optimizer (A/C Cycling) | 09/14/05 | 10/14/05 | 13,155,861 |
| MPower | 01/20/06 | 03/08/06 | 14,163,531 |

*Note: A revision to the Energy Optimizer Tariff (also referred to as the A/C Cycling Tariff) was filed on 09/06/2007 in both Kansas and Missouri. It was approved by the KCC on 10/03/2007 and by the MPSC on 10/06/2007.

A revision to the MPower Tariff was filed on 04/09/2007 in both Kansas and Missouri. It was approved by the KCC on 06/18/2007 and by the MPSC on 05/05/2007. A second revision to the MPower Tariff was filed on 04/30/2008 in both Kansas and Missouri. It was approved by the KCC on 6/24/2008 and by the MPSC on 5/30/2008.

^{**} The Change a Light program is filed annually for approval. The 2006 and 2007 budgets are included in the 2005 Change a Light \$762,500 budget.