

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

In the Matter of Kansas City Power & Light)
Company's Notice of Intent to File an) File No. EO-2019-0132
Application for Authority to Establish a Demand-)
Side Programs Investment Mechanism)

In the Matter of KCP&L Greater Missouri)
Operations Company's Notice of Intent to File an) File No. EO-2019-0133
Application for Authority to Establish a Demand-)
Side Programs Investment Mechanism)

**DIVISION OF ENERGY'S
STATEMENT OF POSITIONS**

COMES NOW the Missouri Department of Natural Resources – Division of Energy (DE) and, pursuant to the Commission's August 7, 2019, *Order Granting Variance, Setting Procedural Schedule And Other Procedural Requirements*, respectfully offers the following *Statement of Positions* on the Cycle 3 Missouri Energy Efficiency Investment Act (MEEIA) applications of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (KCP&L or Companies) in the above-styled matters.

Statement of Positions

1. Should the Commission approve, reject, or modify the Companies' MEEIA Cycle 3 Plans (MEEIA 3), along with the waivers in the Companies' application intended to enable its implementation?

DE POSITION:

DE respectfully recommends that the Commission approve with modifications the Companies' MEEIA 3 plans, as described below and in testimony. DE takes no position as to the waivers in the Companies' application.

a. If MEEIA 3 should be modified, how should the plans be modified?

DE POSITION:

DE has three suggested areas of modification.

First, DE respectfully recommends that the Company change the name of the proposed “Heating, Cooling & Weatherization” program to “Heating, Cooling, and Home Comfort.”¹ DE recommends this change to avoid any potential confusion for customers.²

Second, DE respectfully recommends that the Companies revise the language in the tariffs attached to their MEEIA 3 application to match the language of § 393.1075, RSMo.³ The currently proposed tariffs reflect the previous iteration of § 393.1075.14 (2016), RSMo, which was revised in 2017.⁴

Finally, since MEEIA Cycle 2, combined heat and power (CHP) projects have been considered eligible under the Business Custom program.⁵ DE supports the continuation of that offering, and recommends the Companies continue their momentum and improve the depth and quality of the CHP option in the Custom Business Rebate Program by:

- Completing CHP-specific program guidance within one year of case completion;⁶
- Providing collaboratively-developed CHP-specific program guidance to registered contractors, business development representatives, and customers (via website);⁷
- Becoming engagement partners in the national packaged CHP e-Catalog,⁸ and

¹ EO-2019-0132/0133 EFIS Item 76, Hyman Rebuttal, 6:1-13.

² *Id.*

³ *Id.*, at 6:14-7:5.

⁴ *Id.*, CCS#2/HCS/SCS/SB 112 (2017).

⁵ EO-2019-0132/0133, KCP&L Surrebuttal Report, 63:9-10.

⁶ EO-2019-0132/0133, EFIS Item 77, Epperson Rebuttal, 12:1-10; 12:13-17. DE would assist the Companies in this effort and provide support with this endeavor.

⁷ *Id.*, at 12:1-10; 12:17-19.

⁸ *Id.*, at 9:1-4.

invite CHP packagers and solution providers vetted through the e-Catalog to become registered contractors in the Companies' Business Custom rebate program;⁹

- Continuing to support CHP in future MEEIA filings;¹⁰ and,
- Adopting the goal of successfully assisting one customer to complete a CHP installation within three years of case completion.¹¹

On the remaining issues numbered two through five and the additional MEEIA sub-issue, DE takes no position.

WHEREFORE, Division of Energy respectfully requests that the Commission will accept this *Statement of Positions*.

Respectfully submitted,

/s/ Jacob Westen

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was delivered per the requirements of 4 CSR 4240-2.080 *et seq.*, on this 18th day of September, 2019, to all counsel of record.

/s/ Jacob Westen

⁹ EO-2019-0132/0133, Epperson Rebuttal, 9:4-6.

¹⁰ *Id.*, 12:19-20.

¹¹ *Id.*, 12:20-21.