Exhibit No.:

Issues: Demand-Side Management
Witness: Allen D. Dennis
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Kansas City Power & Light Company
Case No.: ER-2009-0089

Date Testimony Prepared: March 11, 2009

#### MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2009-0089

#### REBUTTAL TESTIMONY

OF

#### **ALLEN D. DENNIS**

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

Kansas City, Missouri March 2009

# REBUTTAL TESTIMONY

## OF

## ALLEN D. DENNIS

## Case No. ER-2009-0089

1	Q:	Are you the same Allen D. Dennis who submitted Direct Testimony in this				
2		proceeding?				
3	A:	Yes, I am.				
4	Q.	What is the purpose of your Rebuttal Testimony?				
5	A:	To provide rebuttal to the direct testimony filed by Laura Wolfe, Energy Specialist, on				
6		behalf of the Missouri Department of Natural Resources ("MDNR"), concerning the level				
7		of energy efficiency and demand response programs.				
8	Q:	Do you take exception with Ms. Wolfe's view of Kansas City Power & Light				
9		Company's ("KCP&L") energy efficiency and demand response programs?				
10	A:	Yes, I do. In her direct testimony, Ms. Wolfe references the document Missouri				
11		Department of Natural Resources Energy Center Review of Kansas City Power & Light				
12		Company's Integrated Resource Plan Filing, MPSC Case No. EE-2008-0034, ("IRP").				
13		She compares KCP&L's annual incremental energy savings as set forth in IRP Table 2				
14		with energy savings values obtained from other jurisdictions, which is shown in IRP				
15		Table 3. Ten jurisdictions are listed in IRP Table 3, including Iowa.				
16		In IRP Table 3, Ms. Wolfe references the targeted Iowa energy savings to be 1.5				
17		percent of annual retail sales by 2011. Iowa's energy savings targets are gross energy				

- savings and are not discounted for free ridership. KCP&L's data in IRP Table 2 are net of free ridership.
- 3 KCP&L's gross energy savings are projected to be 1.44 percent by 2011, 2.18 4 percent by 2012, and 2.81 percent by 2013. This data is shown in Chart 1, below.

Chart 1: KCP&L Gross DSM Savings as a Percent of Billed Total Sales

KCP&L DSM savings as a % of forecast requirements						
	2010	2011	2012	2013	2014	
Residential Energy Savings, kWh	48,442,029	109,627,333	178,783,046	223,300,476	268,348,010	
C&I Energy Savings, kWh	36,689,778	82,741,053	140,739,390	214,201,597	293,651,902	
CEP-1, kWh	42,590,048	58,385,884	67,046,699	67,046,699	67,046,699	
Total Energy Savings, kWh	127,721,855	250,754,270	386,569,135	504,548,772	629,046,611	
Projected annual sales,. kWh	17,077,338,170	17,359,860,790	17,701,677,150	17,958,528,910	18,295,379,520	
Incremental Energy Savings, kWh		0.71%	0.77%	0.66%	0.68%	
Annual Energy Savings, kWh	0.75%	1.44%	2.18%	2.81%	3.44%	
DSM Cumulative Energy savings, kWh	50,352,082,350	67,711,943,140	85,413,620,290	103,372,149,200	121,667,528,720	

# 7 Q: Should Ms. Wolfe's suggested targets be considered by the Commission as part of

8 this proceeding?

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- 9 A: No. Ms. Wolfe's testimony proposes the Commission provide energy efficiency targets

  10 for KCP&L. Targets are already established as part of KCP&L's IRP. The case at hand

  11 needs to focus on current programs. Future program changes should not be considered as
- 13 Q: Does that conclude your testimony?

part of this case.

14 A: Yes, it does.

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Power & Light Company to Modify Its Tariff to  Continue the Implementation of Its Regulatory Plan  Case No. ER-2009-0089								
AFFIDAVIT OF ALLEN D. DENNIS								
STATE OF MISSOURI )								
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 Rebuttal Testimony								
on behalf of Kansas City Power & Light Company consisting of <u></u> せい (之) pages and								
Schedule(s), all of which 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.  Allen D/ Dennis								
Subscribed and sworn before me this 10th day of March 2009.								
Notary Public								
My commission expires:  "NOTARY SEAL"  Nicole A. Wehry, Notary Public  Jackson County, State of Missouri  My Commission Expires 2/4/2011  Commission Number 07391200								