

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

1 savings and are not discounted for free ridership. KCP&L’s data in IRP Table 2 are net
 2 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.

5 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

6
 7 **Q: Should Ms. Wolfe’s suggested targets be considered by the Commission as part of**
 8 **this proceeding?**

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
 12 part of this case.

13 **Q: Does that conclude your testimony?**

14 A: Yes, it does.

