

Exhibit No.:

Issue:

Witness:

Sponsoring Party:

Case No.:

Energy Efficiency Programs,
Weatherization Program

Robert T. Jackson

City of Kansas City, Missouri

Case No. ER-2006-0314

CITY OF KANSAS CITY, MISSOURI

Case No. ER-2006-0314

FILED

NOV 13 2006

SURREBUTTAL TESTIMONY

OF

Missouri Public
Service Commission

ROBERT T. JACKSON

Kansas City, Missouri

October, 2006

City of
KC Exhibit No. *502*
Case No(s) *ER-2006-0314*
Date *10-16-06* Rptr *XF*

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas City)
Power & Light Company for Approval to Make)
Certain Changes in its Charges for Electric) Case No. ER-2006-0314
Service to Begin the Implementation of its)
Regulatory Plan)

AFFIDAVIT OF ROBERT T. JACKSON


STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

I, Robert T. Jackson, of lawful age, and being duly sworn, do hereby depose and state:

1. My name is Robert T. Jackson. I am presently Weatherization Program Administrator with the City of Kansas City, Missouri, intervener in the referenced matter.

2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my personal knowledge, information and belief.


Robert T. Jackson

Subscribed and sworn to before me, a Notary Public, this 6th day of September, 2006.

BELEN L CAMPO
Notary Public - Notary Seal
STATE OF MISSOURI
Jackson County

My Commission expires:

November 28, 2009

My Commission Expires: Nov 28 2009
Notary Public for Jackson County, MO



1 SURREBUTTAL TESTIMONY OF ROBERT T. JACKSON

2 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

3 A. My name is Robert T. Jackson. My business address is Department of Neighborhoods
4 and Community Services, 4th Floor, City Hall, 414 East 12th Street, Kansas City,
5 Missouri 64106.

6
7 Q. ARE YOU THE SAME ROBERT T. JACKSON WHO FILED WRITTEN REBUTTAL
8 TESTIMONY IN THIS MATTER?

9 A. Yes, I am.

10
11 Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

12 A. I am testifying in response to remarks made by Mr. William Dias during the local public
13 hearing in this matter held in Kansas City, Missouri on August 24, 2006. Mr. Dias was
14 granted intervention in this case on September 19, 2006. As a party, his statements at the
15 local public hearing may be questioned during the hearing of this matter and therefore I
16 am addressing them in testimony.

17
18 Q. DESCRIBE FOR THE COMMISSION THE PORTION OF MR. DIAS' TESTIMONY
19 AT THE LOCAL PUBLIC HEARING THAT YOU ARE REFERRING TO.

20 A. During the local public hearing in Kansas City, Mr. Dias made general references to
21 energy conservation programs and weatherization programs and appeared to argue for a
22 Company underwritten weatherization program that was available to customers without
23 consideration of income eligibility. He later filed with the Commission a draft

1 Memorandum of Understanding dated June 5, 2006. This Memorandum referred to a
2 weatherization program Mr. Dias wanted the Company to consider. The Memorandum
3 was not signed and has not been agreed to.

4
5 Q. WHAT IS YOUR RESPONSE TO MR. DIAS' REMARKS AND THE SUBJECT
6 MATTER FOUND IN THE FORM OF THE MEMORANDUM OF
7 UNDERSTANDING HE HAS SUBMITTED TO THE COMMISSION?

8 A. Mr. Dias has not filed written testimony in this case and that has generally been the
9 document from which parties learn the background and qualifications of a witness. I do
10 not know, and would expect the other parties do not know, whether Mr. Dias has ever
11 been involved in weatherization programs in the past. His education and experience have
12 not been shared with the parties.

13
14 Mr. Dias has not described with specificity what he means by a weatherization program.
15 He does not explain where resources and program management will be obtained for the
16 weatherization program he mentions. It is probably more accurate to refer to his idea as
17 a "Pay As You Save" program, not a weatherization program.

18
19 Mr. Dias concept of a weatherization program is in conflict with Appendix C of the
20 stipulation between the parties entered in Case No. ER-2005-0329.

21
22 It is unclear if Mr. Dias' weatherization program will employ an authorized CAP. His
23 program apparently would eliminate the "blending" of multiple funding sources, such as

1 the grants from the Department of Energy, to address older properties. It also fails to
2 utilize economies of scale for administrative efficiencies to deliver services. These are a
3 few of my observations about his concept.

4
5 Q. IS THERE A WAY TO COMPARE THE WEATHERIZATION PROGRAM
6 ADMINISTERED BY THE CITY IN PARTNERSHIP WITH KCPL TO THE ENERGY
7 CONSERVATION AND WEATHERIZATION PROGRAM IN MR. DIAS'
8 MEMORANDUM OF UNDERSTANDING?

9 A. No, there is not. First, I will repeat that the specifics of his concept of a weatherization
10 program are unknown. Regarding the program administered by the City, the Commission
11 may already know that it serves more than sixty percent (60%) of urban-core residents.
12 Close to twenty percent (20%) of the City's weatherization contractors are African-
13 American. Numerous evaluations at the national, state and local level have confirmed the
14 effectiveness of the City's weatherization program. The program has been held as a
15 **model** program by the state of Missouri on numerous occasions. Per the federal
16 regulations, Missouri DNR recognizes the City as the weatherization provider for the
17 Kansas City area. As far as I know, the City is the only resource with the necessary
18 expertise and staff to deliver weatherization per the U.S. Department of Energy
19 requirements in the Kansas City area. The City's program weatherizes rental properties
20 and has been doing so for more that 12 years. I believe that the City administered
21 program accomplishes its objectives with high efficiency and capitalizes on all available
22 private and public resources in proper scale. With the respect to possible improvements,
23 I will refer the Commission to my earlier filed rebuttal testimony in this proceeding.

1

2 Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

3

A. Yes, it does.