

**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)
Application for Authority to Establish a Demand-)
Side Programs Investment Mechanism)
File No. EO-2019-0132

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

**KANSAS CITY POWER & LIGHT COMPANY’S
AND KCP&L GREATER MISSOURI OPERATIONS COMPANY’S
APPLICATION FOR APPROVAL
OF MODIFICATION TO ITS TECHNICAL RESOURCE MANUAL**

COMES NOW Kansas City Power & Light Company and Greater Missouri Operations¹ (“KCP&L and GMO” or “the Company”), and submits this *Request to Revise Technical Resource Manual* to the Missouri Public Service Commission (“Commission”) for approval. In support- thereof, the Company respectfully states as follows:

1. On December 11, 2019, the Commission approved the Company’s MEEIA 3 application in its Report and Order. The Report and Order does not mention approval of the Company-specific Technical Resource Manual (“TRM”) which was also submitted with the Company’s application.

2. The TRM sets forth measures, the level of energy savings, incremental costs and effective, useful lives associated with each measure. The TRM, and certain updates thereto, are also used to calculate throughput disincentive on a prospective basis (subject to DSIM² true-up provisions).

¹ Effective October 7, 2019, Evergy Metro Inc. d/b/a Evergy Missouri Metro adopted the service territory and tariffs of KCP&L and Evergy Missouri West, Inc. d/b/a Evergy Missouri West adopted the service territory and tariffs of GMO. However, since the above MEEIA cases were filed using the KCP&L and GMO names, those names will be used in this pleading.

² “Demand-Side Investment Mechanism”

3. The Company offers a revised TRM for the Commission's approval. The revised TRM changes are based on incorporating the final EM&V results from KCP&L and GMO's program year 3 in MEEIA Cycle 2. The proposed revisions to the TRM are supplemented with additional details and were reviewed by the Third- Party Evaluator (Navigant Consulting).

4. These updates have been discussed with Commission Staff and reviewed by the Implementation Team and by the Company's contractors. Additionally, the measure changes will not require any adjustment of the portfolio's goals. The revisions are found in the following attachments:

<u>Attachment</u>	<u>Name</u>	<u>Description</u>
A	TRM MEEIA Cycle 3 2020-01-01	DSM Measure Assumptions for KCP&L and GMO TRM with changes proposed
Confidential B	Confidential Incentive Ranges MEEIA Cycle 3	Updated Incentive Range list with changes proposed
C	New TRM Measures Rationale	Rationale for measure changes

5. Based on the information provided herein, KCP&L and GMO asks the Commission to approve the TRM as revised to be effective on January 1, 2020.

WHEREFORE, KCP&L and GMO requests the Commission issue an order approving the proposed revisions to the TRM.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Kansas City Power & Light
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand delivered, emailed or mailed, postage prepaid, to all counsel of record in this case on this 16th day of December 2019.

/s/ Roger W. Steiner

Counsel for Kansas City Power &
Light Company and KCP&L Greater
Missouri Operations Company