

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	)	

**CITY OF KANSAS CITY'S PREHEARING BRIEF**

Comes now the City of Kansas City, Missouri (City) and submits its prehearing brief. The City has limited its brief to the issues on which it has taken some position or on which it has filed testimony.

**Weatherization Program:**

ISSUE:       Should the weatherization program be modified so that KCPL's Call Center will refer customers to the program?

Historically, the City secures weatherization applicants to participate in the program and then refers those applicants to KCPL for approval based on the applicant's record of energy consumption. Following those steps, KCPL must then return the approved applicant list to the City for further processing. It is the City's position that the program would progress more efficiently if KCPL's call center would first refer applicants to the program.

ISSUE:       Should LIHEAP recipients be directed to the weatherization program and be required to participate in it?

As Mr. Robert T. Jackson explains in his filed testimony, utility service assistance is made available annually through the Missouri Department of Social Services with federal Low

Income Home Energy Assistance Program funds (LIHEAP). The recipients of these funds must work directly with the utility that provides them service. There are LIHEAP recipients who regularly receive service from KCPL who can benefit from the City/KCPL weatherization program. If LIHEAP recipients were directed to the City/KCPL weatherization program the pressure on the LIHEAP program would reduce and open the way for new applicants for those dollars. The City proposes that with respect to LIHEAP recipients who are also KCPL customers, KCPL can be a coordinator in directing those customers for weatherization services through the City/KCPL partnership. The Missouri Energy Task Force has recommended that the Department of Social Services amend its rules for the program in a way to widen weatherization program participation by recipients of LIHEAP support. Adding KCPL's coordination to the weatherization referral process would greatly increase the utilization level of both programs.

ISSUE: Should KCPL participate in an "Energy Conservation Program" that will provide consultation, weatherization materials and installation? If so, should the cost of the program to be underwritten by KCPL and charged to the customer?

The City will take no position on this issue. The City and the Missouri Department of Natural Resources object to the inclusion of this issue and assert that it is not properly before the Commission in this case.

Respectfully submitted,

/s/ Mark W. Comley

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 12th day of October, 2006, to all parties of record.

/s/ Mark W. Comley

Mark W. Comley