

Exhibit No.:
Issues: Demand-Side Management
Witness: Allen D. Dennis
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: KCP&L Greater Missouri
Operations Company
Case No.: ER-2009-0090
Date Testimony Prepared: March 13, 2009

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2009-0090

REBUTTAL TESTIMONY

OF

ALLEN D. DENNIS

ON BEHALF OF

KCP&L GREATER MISSOURI OPERATIONS COMPANY

**Kansas City, Missouri
March 2009**

REBUTTAL TESTIMONY

OF

ALLEN D. DENNIS

Case No. ER-2009-0090

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: The purpose of my rebuttal testimony is to rebut the direct testimony filed by Laura
6 Wolfe, Energy Specialist, on behalf of the Missouri Department of Natural Resources
7 (“MDNR”), concerning the level of energy efficiency and demand response programs.

8 **Q: Do you take exception with Ms. Wolfe’s view of KCP&L Greater Missouri**
9 **Operations Company’s (“GMO”) energy efficiency and demand response**
10 **programs?**

11 A: Yes, I do. GMO anticipates using the same approach Kansas City Power & Light
12 Company (“KCP&L”) used in *Missouri Department of Natural Resources Energy*
13 *Center Review of Kansas City Power & Light Company's Integrated Resource Plan*
14 *Filing*, MPSC Case No. EE-2008-0034 (“IRP”). Ms. Wolfe takes exception with
15 KCP&L’s Integrated Resource Planning (“IRP”) in her direct testimony filed in *In the*
16 *Matter of the Application of Kansas City Power & Light Company to Modify Its Tariff to*
17 *Continue the Implementation of Its Regulatory Plan*, MPSC Case No. ER-2009-0089
18 (“KCP&L Rate Case”). Ms. Wolfe believes there should be targets set for demand

1 response programs and compares KCP&L's annual incremental energy savings as set
 2 forth in IRP Table 2 with energy savings values obtained from other jurisdictions, which
 3 is shown in IRP Table 3. Ten jurisdictions are listed in IRP Table 3, including Iowa.

4 In IRP Table 3, Ms. Wolfe references the targeted Iowa energy savings to be 1.5
 5 percent of annual retail sales by 2011. Iowa's energy savings targets are gross energy
 6 savings and are not discounted for free ridership. KCP&L's data in IRP Table 2 are net
 7 of free ridership.

8 KCP&L's gross energy savings are projected to be 1.44 percent by 2011, 2.18
 9 percent by 2012, and 2.81 percent by 2013. This data is shown in Chart 1, below.

10 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

11
 12 **Q: Should Ms. Wolfe's suggested targets be considered by the Commission as part of**
 13 **this proceeding?**

14 A: No. As in KCP&L's current rate case, Ms. Wolfe's testimony proposes that the
 15 Commission provide energy efficiency targets for GMO although GMO has not filed its
 16 IRP filing. Also, she anticipates the same concerns regarding KCP&L's IRP to be part of
 17 GMO's yet-to-be-filed IRP. The case at hand needs to focus on current programs.
 18 Future or anticipated program changes should not be considered as part of this case.

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

20 A: Yes, it does.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Aquila, Inc. dba)
KCP&L Greater Missouri Operations Company to) Case No. ER-2009-0090
Modify Its Electric Tariffs to Effectuate a Rate Increase)

AFFIDAVIT OF ALLEN D. DENNIS

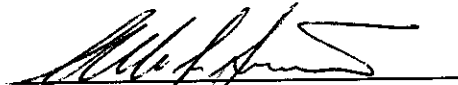
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Allen D. Dennis, being first duly sworn on his oath, states:

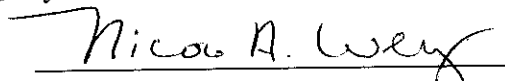
1. My name is Allen D. Dennis. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Director, Products and Services.

2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of KCP&L Greater Missouri Operations Company consisting of two (2) pages and Schedule(s) ~~_____ through _____~~, 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 13th day of March 2009.


Notary Public

My commission expires: Feb. 4, 2011

