

DATA REQUEST– Set TRIG_20060804
Case: ER-2006-0314
Date of Response: 08/24/2006
Information Provided By: Mike Deggendorf
Requested by: Herz Joseph

Question No.: 27

The following pertains to the activities of KCPL's marketing group (i.e. the group that seeks to sell regulated KCPL products and services within KCPL's certificated Missouri territory).a) Are the activities of this group ratepayer-funded?b) Provide an estimate of the expense of efforts by this group (as well as expense of other departments or divisions within the Company allocated to downtown Kansas City, Missouri) specifically directed at moving existing and prospective customer load from alternative energy sources (e.g. Trigen district energy) onto the KCPL electric system.c) Please provide the last 5 years' actual historical and budgeted spending by this group and percentage that is funded by ratepayers.

Response:

a. KCPL assumes your reference to the marketing group is addressing the Energy Solutions Department. The activities of Energy Solutions are included in the Company's cost of service in our current rate case.

b) and c) were formally objected in a separate letter.

DATA REQUEST– Set TRIG_20060804
Case: ER-2006-0314
Date of Response: 08/24/2006
Information Provided By: Mike Deggendorf
Requested by: Herz Joseph

Question No. : 33

a) In addition to those efforts discussed in DR's – above, has KCPL promoted, or does KCPL reasonably anticipate promoting, any media advertising campaigns or demand side management programs designed to encourage customers to conserve electricity by implementing measures to reduce consumption? Please explain. b) Please identify and describe the primary purpose(s) of any conservation efforts undertaken by KCPL (e.g., reduce summer peak usage, reduce winter peak usage, improve system or customer load factor, avoid or defer need for additional generation capacity to meet system peak load, etc.). c) Referring to item (a) above, please indicate when KCPL first began the referenced energy conservation activity. d) Have the costs associated of KCPL's energy conservation activity been included in and recovered through KCPL's current effective rates and tariffs? Please explain. e) Referring to items (a) and (d) above, has KCPL sought recovery of the cost of its energy conservation measures in the Company's pending rate case, Case No. ER-2006-0314? Please explain. f) Has KCPL set targets (in total kWh or kW demand) for reduced energy consumption resulting from the identified conservation efforts? Please explain. g) In general terms, is it the expectation of KCPL that it will recover through its regulated rates any lost margin that might result from decreased energy consumption due to conservation initiatives, as well as the costs of the conservation program itself? Please explain.

Response:

- a. KCPL's proposed portfolio of demand side management programs was approved in the Stipulation and Agreement, Docket No. EO-2005-0329. Details of the program, proposed budgets, and estimated kW and kWh savings were made available in Appendix C.
- b. The primary purpose of our energy efficiency programs is to provide information and opportunities by which customers can manage their energy use and save money on their energy bills, while providing the best utilization of Company facilities. The primary purpose of our demand response programs is to reduce demand during summer peak use times as needed.
- c. KCPL's proposed portfolio included 15 programs and a roll-out schedule of 2 years. As of August 15, we have 9 programs approved in Missouri. Some of these programs are informational/educational programs. Others are direct impact programs or demand response programs. A list of approved programs and the date of approval are as follows:

Program

Approved Date

Low Income Weatherization	Dec 1, 2005
Home Energy Analyzer (online information)	Dec 21, 2005
Change a Light, Change the World	Oct 1, 2005
Business Energy Analyzer (online information)	Feb 12, 2006
C&I Audit Rebate	Jul 10, 2006
C&I Custom Rebate – New Construction	Jul 10, 2006
C&I Custom Rebate – Retrofit	Jul 10, 2006
Energy Optimizer (A/C Cycling)	Oct 14, 2005
MPower (C&I Curtailment)	Mar 8, 2006

- d. Costs have been charged to a regulatory asset account and will be amortized over a 10 year period provided the Commission finds these costs were prudent. Until they are approved, they are not included in and recovered through rates.
- e. We have requested recovery of costs in the current rate case.
- f. Yes, KCPL has estimated potential savings in energy and demand and provided those estimates in Appendix C to the Stipulation and Agreement, Docket No. EO-2005-0329.
- g. We have not requested recovery of lost margin from energy efficiency programs.

DATA REQUEST– Set TRIG_20060804
Case: ER-2006-0314
Date of Response: 08/24/2006
Information Provided By: Mike Deggendorf
Requested by: Herz Joseph

Question No.: 36

Does KCPL dispute that the use of alternative energy, specifically district energy, when employed in such a way to relieve peak system electrical demand serves the policy mandate of the need for reducing addition of the highest cost and least utilized electric production capacity on its system? Does KCPL believe that alternative energy sources such as district energy that enable electric system demand relief should be discouraged?

Response:

No.

No.

KCPL is in the business of providing electric energy needs to its service territory. KCPL has developed and implemented programs to best utilize the products and services it provides. KCPL employs evaluations of demand side management and supply side alternatives and integrates the results in determining the best course of action in meeting customer's needs for light, space conditioning and motive power.