Exhibit No.:

Issue:

Energy Efficiency Programs,

Weatherization Program

Witness:

Sponsoring Party:

Robert T. Jackson

Case No.:

City of Kansas City, Missouri

Case No. ER-2006-0314

CITY OF KANSAS CITY, MISSOURI

Case No. ER-2006-0314

REBUTTAL TESTIMONY

FILED

NOV 1 3 2006

OF

Missouri Public Service Commission

ROBERT T. JACKSON

Kansas City, Missouri September, 2006

> Exhibit No. Case No(s). Pot Aptr

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)	
) \$8	
COUNTY OF JACKSON)	

- 1, 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 rebuttal 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 F. Jackson

Subscribed and sworn to before me, a Notary Public, this 15th day of September, 2006.

My Commission expires:

11-28-2009

Yotary Public

BELEN L. CAMPO
Notary Public - Notary Seal
STATE OF MISSOURI
Jackson County
My Commission Expires: Nov. 28,2009

Commission #05794064

- PLEASE STATE YOUR NAME AND BUSINESS ADDRESS. Q. 2
- My name is Robert T. Jackson. My business address is Department of Neighborhoods Α. 3
- and Community Services, 4th Floor, City Hall, 414 East 12th Street, Kansas City,
- Missouri 64106. 5

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- BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY? Q. 7
- I am employed by the City of Kansas City as Weatherization Program Administrator 8 A. within the Department of Neighborhoods and Community Services.

10

9

- WHAT IS THE PURPOSE OF YOUR TESTIMONY? Q. 11
- I want to add my comments to observations made by Ms. Anita Randolph in her direct A. 12
- testimony filed on August 8, 2006 respecting Kansas City Power & Light's (KCPL) 13
- compliance with the stipulation and Regulatory Plan approved in Case No. ER-2005-14
- 0329, particularly Appendix C. Ms. Randolph refers to the Affordability, Energy 15
- Efficiency and Demand Response Programs ("Customer Programs") which KCPL 16
- committed to as part of its Regulatory Plan. 17

18

- Q. IN GENERAL, IS THE CITY SATISFIED WITH KCPL'S IMPLEMENTATION OF 19
- THE CUSTOMER PROGRAMS? 20
- Yes. The City is also pleased to be a partner with KCPL in its efforts to assure energy 21 A.
- affordability for its low-income customers. The City is active in the low income 22
- weatherization program described on page C-1 of Appendix C. The City is one, if not the 23

KCPL customers.

22

1		largest, of the Community Action Agencies referred to in that portion of the appendix. I
2		will add that while the City/KCPL partnership is moving in the right direction, there are
3		some minor adjustments that I believe will enhance the process.
4		
5	Q.	WHAT ADJUSTMENTS TO THE WEATHERIZATION PROGRAM DO YOU
6		SUGGEST?
7	A.	Historically, the City has been securing weatherization applicants to participate in the
8		program and then refers those applicants to KCPL for approval based on the applicant's
9		record of energy consumption. Following those steps, KCPL must then return the
10		approved applicant list to the City for further processing.
11		
12	Q.	IS THERE A WAY TO IMPROVE THIS PROCESS?
13	A.	Given the broad concern about energy costs for low-income households, I would propose
14		that KCPL have its call center refer applicants to the program. This would be very
15		appropriate for a particular class of applicant who would be eligible for low income
16		weatherization assistance.
17		
18		Annually, fuel assistance is made available through the Missouri Department of Social
19		Services with the federal Low Income Home Energy Assistance Program funds
20		(LIHEAP). The recipients of these funds must work directly with the utility that
21		provides them service, and that would be the case with LIHEAP recipients who are also

The LIHEAP recipients from the previous year are mailed a new application for the upcoming year. That application is sent about the time when the state receives its LIHEAP allocation. Largely the same recipients apply for and are granted the limited federal dollars which severely limits the number of "new" applicants who may participate in the program. If LIHEAP recipients were directed to the City/KCPL weatherization program the pressure on the LIHEAP program would reduce and furthermore, new applicants for those dollars could become recipients.

I am confident that KCPL's call center visits with the same LIHEAP applicants on at least an annual basis, if not throughout the calendar year, and by means of that contact, KCPL can be the coordinator in sending those customers for weatherization services through the City/KCPL partnership. I believe there can be improved benefits to the ratepayer funded weatherization program by means of KCPL referring its known customers that stand to benefit though the weatherization program. In the end, this effort allows KCPL to better target weatherization funds.

- Q. HAS THIS MATTER BEEN CONSIDERED BY THE MISSOURI ENERGY TASK FORCE?
- 19 A. The Task Force is aware of the issue and in its report of August 13, 2006, recommends
 20 that

[Department of Social Services] should modify its rules to require that individuals living in owner occupied dwellings who receive utility assistance shall be referred to the appropriate weatherization agency for weatherization of their residence, and that any individuals who refuses to participate, if services are available and offered, in the weatherization program after that referral shall be

Rebuttal Testimony of Robert T. Jackson Page 4

1		available and offered, in the weatherization program after that
2		referral shall be denied future utility assistance.
3		
4		If this recommendation were accepted along with the added coordination of KCPL's
5		call center as I have outlined it in this testimony, it is my opinion that the benefits of the
6		weatherization program can be much better utilized.
7		
8	Q.	DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?
n	Δ	Ver it does