

August 11, 2015

Public Comment of the Climate + Energy Project: Docket No. 15-WSEE-115-RTS

The attached comments are respectfully submitted by the Climate + Energy Project (CEP). Since 2007, CEP has provided expertise, participated in informal KCC workshops and made recommendations for renewable energy policies.

We have requested and have been granted intervention in Dockets 10-KCPE-795-TAR, 12-GIMX-337-GIV, 14-KCPE-0420TAR, 14-KCPE-074-GIE, and have submitted public comments in a vast number of other utility rate cases and investigative dockets impacting energy efficiency and renewable energy.

For the second time this year, the Commission has elected to give CEP limited intervener status, although the Commission order, dated 7/23/15 recognizes our knowledge of cost effective energy efficiency. This limited status allowed our filed testimony by Ashok Gupta to be stricken from the record which impedes our ability to ensure that the negative impacts of higher fixed charges for customers who choose to pursue energy efficiency as a means to lower their electricity bills are fully presented to the Commission.

The proposed stipulation agreement in this docket is a welcome step in the right direction. Westar, CURB, KCC Staff and others should be applauded for working together to limit impacts to consumers.

Still, increasing mandatory fixed fees—even at a reduced amount—takes away control over energy costs and options for Kansans and forces costs disproportionately on people who use the least energy. Even with an increase of \$2.50 per month, people will have to pay the higher fees no matter how much energy they use, and they therefore lose control over their energy costs and options. Further, low-income residents living on fixed incomes who use very little energy will have to pay the same as people with large homes that use dramatically more energy.

Westar argues it needs to raise fees to cover its fixed costs, but there are other ways to pay for system upgrades. Other businesses with fixed costs, like grocery stores and gas stations, don't charge mandatory fees. Instead, system costs are reflected in the product price, and consumers can control how much they spend through their purchases.

Instead of allowing Westar to raise mandatory fees, we encourage the Commission to direct them to charge customers for the energy they use. This is the best way to preserve incentives to use less energy and avoid burdening those Kansans who use the least energy with a disproportionate amount of the cost.

Commission Staff and the Commissioners response indicate their belief that CEP is represented by CURB. Despite our appreciation of the great work of CURB, their mission is vastly different than CEP's mission to advance energy efficiency and renewable energy to reduce greenhouse gas emissions while minimizing electric system costs and lowering customer bills.

Therefore, we submit the attached testimony of Ashok Gupta to be entered into the record as public comments and refer you to materials regarding the economic impact of high fixed charges that were submitted with our public comments in the Kansas City Power & Light docket on June 12, 2015

Respectfully,

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