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MISSOURI PUBLIC SERVICE COMMISSION

EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2014-0351

DIRECT TESTIMONY

OF

JANE LOHRAFF

ON

BEHALF OF

MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT

DIVISION OF ENERGY

**Jefferson City, Missouri
February 11, 2015**

(Rate Design)

DE Exhibit No. 403
Date 4-14-15 Reporter KF
File No. ER-2014-0351

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

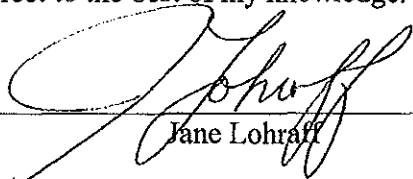
In the Matter of Empire District Electric Company)
Missouri's Tariffs to Increase Its Revenues for) ER-2014-0351
Electric Service)

AFFIDAVIT OF JANE LOHRAFF


STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Jane Lohraff, of lawful age, being duly sworn on her oath, deposes and states:

1. My name is Jane Lohraff. I work in the City of Jefferson, Missouri, and I am employed by the Missouri Department of Economic Development as an Energy Policy Analyst, Division of Energy.
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of the Missouri Department of Economic Development -- Division of Energy.
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 knowledge.


Jane Lohraff

Subscribed and sworn to before me this, February 11, 2015.


Notary Public

My commission expires:

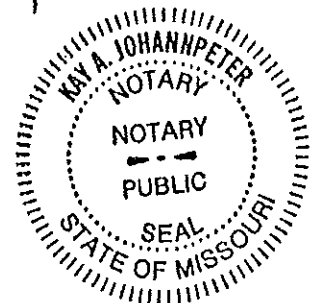
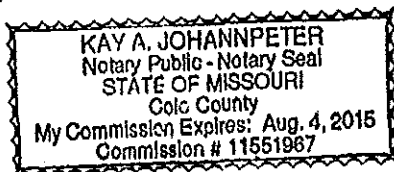


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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. Jane Lohraff, Missouri Department of Economic Development, Division of Energy, 301
4 West High Street, Suite 720, Jefferson City, Missouri 65102.

5 **Q. Have you previously filed testimony in this case?**

6 A. No.

7 **Q. On whose behalf are you testifying?**

8 A. I am testifying on behalf of the Missouri Department of Economic Development,
9 Division of Energy (DE).

10 **Q. Please describe your educational background and employment experience.**

11 A. I received my Bachelor of Arts degree in Geology from Stephens College, Columbia,
12 Missouri and my Masters of Science in Geology from the University of Missouri-
13 Columbia.

14 I began work with the Missouri Department of Economic Development, Division of
15 Energy, in September, 2014. I am an Energy Policy Analyst. Prior to working with the
16 Missouri Department of Economic Development I was employed as a Policy Analyst,
17 Policy Coordinator, and Supervisor of the Policy Coordination Unit within the Missouri
18 Department of Conservation. Prior to working with the Missouri Department of
19 Conservation, I was employed as a Hydrologist III with Missouri Department of Natural
20 Resources, focusing on water policy and management issues.

21 **Q. What information did you review in preparing this testimony?**

22 A. I reviewed tariffs filed in Missouri Public Service Commission's Electronic Filing
23 Information System to inventory existing economic development riders in effect for

1 utilities regulated by the Missouri Public Service Commission. I reviewed examples of
2 economic development riders offered by utilities in other states to determine if they
3 included an energy efficiency requirement. I reviewed the Missouri Energy Efficiency
4 Investment Act (MEEIA)¹, and Commission Rules implementing MEEIA².

5 **Q. What additional experience do you have related to energy efficiency programs and**
6 **MEEIA implementation?**

7 A. On behalf of the Division of Energy, I have participated in the Empire District Electric
8 Company's 2nd and 3rd Demand Side Management Advisory Group Quarterly review
9 meetings in 2014, Ameren Missouri MEEIA Program advisory group meetings, and
10 Ameren Missouri MEEIA Technical Conferences.

11 **II. PURPOSE AND SUMMARY OF TESTIMONY**

12 **Q. What is the purpose of your testimony?**

13 A. The purpose of my testimony is to present the Division of Energy's recommendation to
14 require customer participation in energy efficiency programs offered by Empire District
15 Electric Company (Empire or the Company) as an eligibility requirement for receiving
16 benefits under Empire's voluntary Economic Development Rider (EDR).

17 **Q. How does your direct testimony relate to the January 29, 2015 direct testimony of**
18 **DE's Dr. Alex Schroeder?**

19 A. In direct testimony Dr. Schroeder recommends that the Company maintain its current
20 portfolio of energy efficiency programs, until a MEEIA portfolio is in place. My
21 recommendation to require customers receiving benefits from Empire's EDR to also

¹ § 393.1075.3(2) RSMo.

² 4CSR 240-20.093 and 4CSR 240-20.094

1 participate in the Company's energy efficiency programs is complementary to Dr.
2 Schroeder's recommendation.

3 **Q. Does Empire have a MEEIA portfolio file pending before the Commission?**

4 A. Yes.

5 **Q. What if Empire chooses to not participate in MEEIA?**

6 A. The need for, and benefit of, aligning utility financial incentives with helping customers
7 use energy more efficiently exists whether the utility is participating in MEEIA or not.
8 Economic development riders create incentives that have not yet been aligned with
9 energy efficiency. That alignment should be accomplished either through continuation of
10 existing Empire energy efficiency programs or under its future MEEIA programs. If
11 approved by the Commission, my recommendation provides the opportunity to align
12 goals and improve energy efficiency in either case.

13 **Q. Please provide a summary of your findings and recommendations.**

14 A. My testimony supports customer participation in company-offered energy efficiency
15 programs as a condition of receiving discounted service under Empire's EDR.

- 16 • EDR participation is voluntary and provides a significant benefit to the recipient.
- 17 • Requiring EDR recipients to participate in company-offered energy efficiency
18 programs aligns utility financial incentives with helping customers use energy more
19 efficiently.
- 20 • All Empire customers and the State of Missouri benefit from energy efficiency in the
21 form of lower future energy costs, reduced environmental impacts, and associated
22 reduced power and fuel costs.

- 1 • Connecting energy efficiency with the EDR can also benefit Empire as the Company
2 transitions to a MEEIA by enabling them to count and receive credit for energy
3 efficiency savings generated under MEEIA.

4 **Q. What energy efficiency programs does Empire currently offer?**

5 A. Currently, Empire offers the following energy efficiency programs to its customers: 1)
6 ENERGY STAR® New Homes, 2) High Efficiency AC Rebate Program, 3) Home
7 Performance with ENERGY STAR® Program, 4) Low-Income New Homes, 5) Low-
8 Income Weatherization, 6) Building Operator Certification, and 7) Commercial &
9 Industrial Rebate Program. Details of these programs are found in Dr. Schroeder's direct
10 testimony.

11 **III. LINKING ECONOMIC DEVELOPMENT INCENTIVES TO ENERGY**
12 **EFFICIENCY PROGRAMS**

13 **Q. Please provide an overview of economic development riders currently offered by**
14 **Missouri's investor-owned electric utilities.**

15 A. Each of Missouri's four investor-owned electric utilities offer riders designed to promote
16 economic development and customer retention. A copy of each rider is provided in
17 Schedule JEL-1. The stated purpose of the riders is to encourage new or significantly
18 expanded industrial or commercial businesses to locate in the utilities' service areas by
19 offering a reduction in their utility rates.

20 **Q. Please provide examples of the economic incentives currently offered through**
21 **Missouri electric utilities' economic development riders.**

22 A. The key feature of the current economic development riders is that each offers significant
23 rate discounts for a period of potentially five years:

- 1 1. Empire District Electric Company's economic development rider reduces the pre-
2 tax revenues by 30% the first year, 25% the second year, 20% the third year, 15%
3 the fourth year, and 10% the fifth year.³
- 4 2. Union Electric Company's Economic Development and Retention Rider (EDRR)
5 offers a discount rate of not more than 15% discount from tariff rates, before tax
6 additions, for up to 60 months.⁴ The Company's Economic Re-Development
7 Rider (ERR) offers a 15% discount from tariff rates, before tax additions, for up
8 to 60 months.⁵
- 9 3. Kansas City Power & Light Company's (KCP&L) Economic Development Rider
10 reduces the pre-tax revenues by 30% the first year, 25% the second year, 20% the
11 third year, 15% the fourth year, and 10% the fifth year.⁶ KCP&L's Urban Core
12 Development Rider (UCD) reduces pre-tax revenues either by a) 25% the first
13 year, 20% the second year, 15% the third year, 10% the fourth year, and 5% the
14 fifth year, or b) 10% per year for five years.⁷
- 15 4. Kansas City Power & Light Company –Greater Missouri Operations Company's
16 (KCP&L-GMO) Economic Development Rider reduces the pre-tax revenues
17 under the rider by 30% the first year, 25% the second year, 20% the third year,
18 15% the fourth year, and 10% the fifth year.⁸

19 In addition to these types of incentives, which are generally available to all qualifying
20 customers, certain utilities have negotiated custom or longer-term discounts.

³ Schedule JEL-1, Empire Tariff Sheet 22a

⁴ Schedule JEL-1, Union Electric Company Tariff Sheet 86.1

⁵ Schedule JEL-1, Union Electric Company Tariff Sheet 87.1

⁶ Schedule JEL-1, KCPL Tariff Sheet 32B

⁷ Schedule JEL-1, KCPL Tariff Sheet 41B

⁸ Schedule JEL-1, KCP&L-GMO Tariff Sheet 123.3

1 **Q. What eligibility requirements are typically associated with Missouri utilities'**
2 **economic development riders?**

3 A. The Missouri electric utilities' economic development riders are offered in conjunction
4 with local, regional or state governmental economic development activities and have a
5 number of eligibility requirements including customer characteristics and specific
6 demand characteristics such as peak load or load factor requirements. The currently
7 available economic development riders are offered to industrial and commercial
8 customers not engaged in selling or providing goods and services directly to the general
9 public, with the exception of the KCP&L UCD.

10 The riders also limit availability to certain customer rate classes. The Empire
11 District Electric Company's Economic Development Rider applies to customers under
12 the General Power Service-GP, Total Electric Building Service-TEB, Large Power-LP, or
13 Special Transmission-ST rate schedules.⁹ Union Electric Company's Economic
14 Development Rider applies only to 3M-Large General Service Rate, 4M-Small Primary
15 Service Rate, or 11M-Large Primary Service Rate.¹⁰ KCP&L's Economic Development
16 Rider applies to Medium General Service-MSG, Large General Service-LGS, Large
17 Primary Service-LPS, Small General Service All Electric-SGA, Medium General Service
18 All Electric-MGA, or Large General Service All Electric-LGA rates.^{11,12} KCP&L's
19 Urban Core Development Rider applies to Small General Service-SGS, Medium General
20 Service-MGS, Large General Service-LGS, Large Primary Service-LPS, Small General
21 Service All Electric-SGA, Medium General Service All Electric-MGS, Large General

⁹ Schedule JEL-1, Empire Tariff Sheet 22

¹⁰ Schedule JEL-1, Union Electric Company Tariff Sheet 86

¹¹ Schedule JEL-1, KCP&L Tariff Sheet 32E

¹² The SGA, MGA and LGA rates are no longer offered to new customers.

1 Service All Electric-LGA schedules.¹³ ¹⁴ KCP&L-GMO's Economic Development Rider
2 applies to Medium General Service-MGG, Large General Service-LGS, Large Primary
3 Service-LPS rates.¹⁵

4 The demand and load factor requirements of economic development riders also
5 differ by utility. The Empire District Electric Company requires an annual load factor of
6 50% and peak demand of 300 kW within the first two years of service under the rider.
7 Union Electric Company requires a minimum actual or projected average monthly peak
8 demand of 500 kW and a 55% load factor. KCP&L and KCP&L-GMO require the
9 annual load factor to equal or exceed 55% and a peak demand of 200 kW for years three
10 through five. The customer's annual load factor measures annual average load as a
11 proportion of peak load. Where customers fail to achieve threshold load factors, the
12 Empire, KCP&L and KCP&L-GMO economic development riders identify additional
13 factors which may be considered in determining if an economic development rider should
14 continue. Significant job creation or investment, or improved off-peak utilization of the
15 system are factors listed for consideration in continuing a discount.

16 KCP&L offers an Urban Core Development Rider to encourage re-development
17 of certain geographical areas within the Kansas City area to provide socio-economic
18 benefits as well as more efficient utilization of existing infrastructure.¹⁶ Union Electric
19 Company offers a similar economic re-development rider for the St. Louis geographical
20 area.¹⁷

¹³ Schedule JEL-1, KCP&L UCD Tariff Sheet 41B

¹⁴ The SGA, MGA and LGA rates are no longer offered to new customers.

¹⁵ Schedule JEL-1, KCP&L-GMO Tariff Sheet 123.1

¹⁶ Schedule JEL-1, KCP&L UCD Tariff Sheet 41

¹⁷ Schedule JEL-1, Union Electric Tariff Sheet 87

1 **Q. Have energy efficiency initiatives been tied to utility economic development riders in**
2 **other states?**

3 **A.** Yes. Included in Schedule JEL-2, are the following examples of tariffs from three states
4 which link energy efficiency to economic development riders:

5 1. Indiana: Northern Indiana Public Service Company has as one of the qualifying
6 criteria for participation that high-efficiency, end-use equipment and construction
7 technologies be used.¹⁸

8 2. Wisconsin: Alliant Energy/Wisconsin Power and Light's economic development rider
9 states that the customer "shall implement all economically viable energy efficient
10 options that have a payback period of five years or less."¹⁹

11 3. California: Pacific Gas and Electric Company requires a site inspection to identify
12 energy efficient options and advises the customer on the range of cost-effective
13 options.²⁰

14 **Q. Why should Empire's Economic Development Rider, Tariff Sheet 22 be modified to**
15 **require energy efficiency measures as an eligibility requirement for receiving EDR**
16 **benefits?**

17 **A.** There are a number of reasons to incorporate energy efficiency measures as an eligibility
18 requirement of Empire's EDR:

- 19 • Integrating Empire's existing energy efficiency programs into the voluntary economic
20 development riders will encourage high usage commercial and industrial customers to
21 practice energy efficiency. Increased participation in Company-offered energy

¹⁸ Schedule JEL-2, IURC EDR 677, Sheet No. 126

¹⁹ Schedule JEL-2, Alliant Energy Sheet No. 7.662

²⁰ Schedule JEL-2, Pacific Gas And Electric Company Electric Schedule ED, Sheet 3

1 efficiency programs can benefit Empire's other customers and the Company by better
2 spreading program costs, reducing peak load, and ultimately deferring long-term need
3 for infrastructure upgrades and new energy supply resources.

- 4 • Achieving energy efficiency through Empire's EDR is easily within reach using
5 existing programs, processes, and expertise.
- 6 • Utility Integrated Resource Plans (IRPs) have found that energy efficiency is
7 projected to be the least-expensive, long-term option to address future energy needs
8 for the citizens of Missouri. For example, the Ameren Missouri IRP, Figure 1.3,
9 shows that pursuing energy efficiency programs at a realistic, achievable potential
10 (RAP) level can produce the lowest levelized cost of energy (LCOE), which is a
11 measure of the per unit cost of energy produced by a resource over its expected useful
12 life expressed in cents per kilowatt-hour. LCOE includes all of the costs of
13 construction and ownership, such as the recovery of the capital investment and a fair
14 return for investors, and all of the costs of operations.²¹
- 15 • Reducing future energy use reduces reliance on fossil fuels and lowers emissions
16 furthering the energy policy goals of the State and better positioning individual
17 utilities and the State to meet federal Clean Air Act and perhaps Clean Power Plan
18 requirements when it becomes effective.

19
20
21

²¹ Ameren Missouri, Investing in Missouri//2014 Integrated Resource Plan, Executive Summary, p. 7

1 **IV. PROPOSED TARIFF MODIFICATION**

2 **Q. How should Empire's Economic Development Rider, Tariff Sheet 22 be modified to**
3 **incorporate energy efficiency measures as an eligibility requirement for receiving**
4 **EDR benefits?**

5 A. I recommend adding a final sentence to the Availability section of Tariff Sheet 22 stating
6 "Electric service under this rider is only available in conjunction with participation in
7 applicable energy efficiency programs offered by Empire with the goal of implementing
8 all economically viable energy efficiency opportunities with a payback period of five
9 years or less."

10 **Q. How should Empire's Economic Development Rider, Tariff Sheet 22 be modified to**
11 **describe the customer obligations to participate in Empire's energy efficiency**
12 **programs as a condition of receiving the EDR?**

13 A. The tariff should be modified to describe that in order to be eligible for the economic
14 development riders the customer would be required to meet with Empire's business
15 program representatives to identify economically viable energy efficiency opportunities
16 and implement all economically viable programs or projects that have a projected pay-
17 back period of five years or less. The tariff should also be modified to require that
18 implementation of all such programs or projects should occur within the contract term for
19 service under the EDR. Finally, the tariff should state that customers have the option to
20 request an independent economic analysis of the economic viability of such programs or
21 projects, at the customer's cost.²²

22

²² This language mimics Wisconsin Power and Light EDR Sheet No. 7.662

1 **Q. To which customers should the tariff modifications apply?**

2 A. The energy efficiency requirement should apply to customers initiating a request to take
3 service under the EDR following the effective date of the modified tariff.

4 **Q. How might the EDR customer benefit from your recommendation?**

5 A. In addition to the reduced utility rate specified by the economic development rider, the
6 customer may benefit from reduced energy consumption, potentially improved bottom
7 line and profit margins, and improved productivity and competitiveness. The customer
8 would continue to benefit from the energy efficiency measures for the life of the
9 measures, beyond the term of the economic development rider.

10 **Q. Do you anticipate that requiring implementation of energy efficiency measures will**
11 **significantly increase costs to economic development rider customers?**

12 A. There could be initial upfront costs for the energy efficiency measures, less any
13 incentives from Empire's energy efficiency programs. However, only those
14 economically viable energy efficiency measures with a payback period of five years
15 would be implemented. Adding MEEIA as a participation requirement could actually
16 result in substantial net savings to the participant through lower operating costs in the
17 long term.

18 **Q. How would the proposal benefit Empire's other customers?**

19 A. All customers benefit from improved system efficiency in the form of lower future
20 energy bills, reduced demand for new energy sources and reduced environmental
21 impacts.

22

23

1 **Q. How would the proposal benefit the State?**

2 A. The state of Missouri can benefit from the recommendation by connecting existing
3 program and funding streams, legislative and policy direction, and the private sector to
4 effectively incent economic activity that accomplishes Missouri's energy goals. Reduced
5 emissions can also help the individual utilities and the State meet federal Clean Air Act
6 requirements and perhaps Clean Power Plan requirements when it becomes effective.

7 **Q. Are there unrealized potential areas where implementation of energy efficiency**
8 **measures could result in energy savings and associated customer benefits?**

9 A. Yes, there are numerous, untapped areas for energy efficiency, including water company
10 infrastructure repair, drinking and waste water treatment operations, and utility assisted
11 local building code adoption, compliance and enforcement. I attended public meetings
12 associated with development of the Missouri Comprehensive State Energy Plan, where
13 these opportunities were identified during discussion among Steering Committee experts
14 from around the state.

15 **IV. CONCLUSION**

16 **Q. Please restate your recommendation.**

17 A. The Commission should approve the Division of Energy's recommendation to make
18 customer participation in the Empire-offered energy efficiency programs an eligibility
19 requirement for receiving economic development rider benefits.

20 **Q. Does this conclude your direct testimony?**

21 A. Yes, thank you.

22

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 Original Sheet No. 22

Canceling P.S.C. Mo. No. _____ Sec. _____ _____ Sheet No. _____

**ECONOMIC DEVELOPMENT RIDER
SCHEDULE EDR**

Purpose:

The purpose of the Economic Development Rider is to encourage industrial and commercial business development in Missouri.

Availability:

Electric service under this rider is only available in conjunction with local, regional and state governmental economic development activities where incentives have been offered and accepted by the Customer after the effective date of this rider to locate new facilities or expand existing facilities in the Company's Missouri service area. For purposes of this rider, new facilities shall be defined as a Customer's facility that has not received electric service in the Company's Missouri service area within the last twelve (12) months. Electric service under this rider is only available to a Customer otherwise qualified for service under the Company's GP, TEB, LP or ST rate schedules, and willing to enter into a contract for service for a minimum term of five (5) years.

The availability of this rider shall be limited to industrial and commercial facilities not involved in selling or providing goods and services directly to the general public.

Applicability:

The rider is applicable to new facilities or the additional separately metered facilities meeting the above availability criteria and the following two applicability criteria:

1. The annual load factor of the new Customer or additional facility is reasonably projected to equal or exceed an annual load factor of fifty (50) percent within two (2) years of the date the Customer first receives service under this Rider. The projected annual Customer load factor shall be determined by the following relationship:

$$\text{PAE} / \text{PCD} \times \text{HRS}$$

Where:

PAE = Projected Annual Energy (kWh)

HRS = Hours in year (8760)

PCD = Projected Customer Non-coincident Demand

If the above load factor criterion is not met, the Company may consider the following other factors when determining qualification for the rider:

a. The creation of seventy-five (75) or more new permanent full-time jobs;

2. The peak demand of the new or additional facility is reasonable projected to be at least three-hundred (300) kW within two years of the date the Customer first received service under this rider.

All requests for service under this rider will be considered by the Company. Sufficiently detailed information shall be provided, by the Customer, to enable the Company to determine whether a facility is qualified for the Rider. Service under this rider shall be evidenced by a contract between the Customer and the Company, which shall be submitted to the Commission.

DATE OF ISSUE February 28, 2013
ISSUED BY Kelly S. Walters, Vice President, Joplin, MO

DATE EFFECTIVE April 1, 2013

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 Original Sheet No. 22a

Cancelling P.S.C. Mo. No. _____ Sec. _____ Sheet No. _____

ECONOMIC DEVELOPMENT RIDER
SCHEDULE EDR

Incentive Provisions:

1. Revenue Determination:

The pre-tax revenues under this rider shall be determined by reducing otherwise applicable charges, associated with the GP, TEB, LP or ST rate schedules, by 30% during the first contract year, 25% during the second contract year, 20% during the third contract year, 15% during the fourth contract year and 10% during the fifth contract year. After the fifth contract year, this incentive provision shall cease. All other billing, operational and related provision of the aforementioned rate schedules shall remain in effect.

Bills for separately metered service to existing Customers, pursuant to the provision of this rider, will be calculated independently of any other service rendered to the Customer at the same or other locations.

2. Shifting of Existing Load:

For Customers with existing facilities at one or more locations in the Company's Missouri service area, this rider shall not apply to the service previously provided at any other Company delivery point within the last twelve (12) months. Failure to comply with this provision may result in termination of service under this rider.

Termination:

Failure of the Customer to meet any of the applicability criteria of this rider, used to qualify the Customer for acceptance on the rider, within two years of the date service under this rider begins, may lead to termination of service under this rider.

DATE OF ISSUE February 28, 2013 DATE EFFECTIVE April 1, 2013
ISSUED BY Kelly S. Walters, Vice President, Joplin, MO

FILED
Missouri Public
Service Commission
ER-2012-0345; YE-2013-0375

THE EMPIRE DISTRICT ELECTRIC COMPANY

P.S.C. Mo. No. 5 Sec. 4 Original Sheet No. 22b

Canceling P.S.C. Mo. No. _____ Sec. _____ Sheet No. _____

ECONOMIC DEVELOPMENT RIDER
SCHEDULE EDR

Form of Contract:

This Agreement is entered into as of this _____ day of _____ 20____, by and between Empire District Electric Company (Company) and _____ (Customer).

Witnesseth:

Whereas, Company has on file with the Public Service Commission of the State of Missouri (Commission) a certain Economic Development Rider (Rider), and:

Whereas, Customer is a new Customer, or has acquired additional separately metered facilities within the Company's service territory, and;

Whereas, Customer has furnished sufficient information to the Company to demonstrate that its new facilities or additional separately metered facilities (Facilities) satisfied the Availability and Applicability provisions of the Rider, and:

The Company and Customer agree as follows:

1. Service to the Customer's Facilities located at (address) _____, (city) _____, (state) _____, (county) _____ shall be pursuant to the Rider, all other applicable tariffs, and the Company's General Rules and Regulations applying to electric service, as may be in effect from time to time and filed with the Commission.
2. Customer further acknowledged that this Agreement is not assignable voluntarily by Customer, but shall nevertheless inure to the benefit of and be binding upon the Customer's successors by operation of law.
3. Customer acknowledges that all information provided to the Company for the purpose of determining whether the Customer is eligible for service under the Rider shall be retained by the Company, and shall be subject to inspection and disclosure under Chapters 383 and 393, RSMo 2011, as amended from time to time. Should the Customer designate any of such information as proprietary or confidential, the Company shall notify Customer of any request for inspection or disclosure, and shall use good faith efforts to secure an agreement or Commission order protecting the proprietary or confidential nature of such information.
4. This Agreement shall be governed in all respects by the laws of the State of Missouri (regardless of conflict of laws provisions), and by the orders, rules and regulations of the Commission they may exist from time to time. Nothing contained herein shall be construed as divesting, or attempting to divest, the Commission of any rights jurisdiction, power or authority vested in it by law.

In witness whereof, the parties have signed this Agreement as of the date first above written.

Empire District Electric Company _____
(Customer)

By _____ By _____

DATE OF ISSUE February 28, 2013 DATE EFFECTIVE April 1, 2013
ISSUED BY Kelly S. Walters, Vice President, Joplin, MO

UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 6OriginalSHEET NO. 86

CANCELLING MO.P.S.C. SCHEDULE NO. _____

SHEET NO. _____

APPLYING TO _____

MISSOURI SERVICE AREARIDER EDRRECONOMIC DEVELOPMENT AND RETENTION RIDERPURPOSE

The purpose of this Economic Development and Retention Rider is to encourage new industrial and commercial development in Company's service territory and to retain existing load where possible.

AVAILABILITY

Electric service under this Rider is only available, at Company's option, to customers currently served by or considering service from the Company where other viable electric supply options outside of Company's service area have been offered. Customer must be currently served, or qualify for service, under the Company's Service Classifications 3(M) Large General Service Rate, 4(M) Small Primary Service Rate, or 11(M) Large Primary Service Rate. Electric service under this Rider is only available in conjunction with local, regional, or state governmental economic development activities where incentives have been offered and accepted by customer who is requesting service to locate new or expanding facilities in the Company's service area or whose exit from the Company's service area is imminent.

APPLICABILITY

The qualifying load under this Rider shall be the entire load of a new customer, the incremental new load of an existing customer, or the portion of an existing customer's load for which exit from the Company's service area is imminent. In addition, the qualified load must meet the following criteria for consideration under this Rider:

1. The annual load factor of the customer's qualifying load is reasonably projected to equal or exceed fifty-five percent (55%) during the entire term of application of this Rider.
2. The average monthly peak demand of the customer's qualifying load is, or is reasonably projected to be, at least 500 kW during each contract year under this Rider.
3. The availability of this Rider shall be limited to industrial and commercial facilities not involved in selling or providing goods and/or services directly to the general public.

As a condition for service under this Rider, customer must furnish to Company such documentation as deemed necessary by Company to verify customer's intent to select a viable electric supply option outside of Company's service area, including an affidavit stating customer's intent.

The Company, at its sole discretion, shall determine whether an applicant or customer meets the requirements of this Rider and the acceptability of the information provided.

FILED
Missouri Public
Service Commission
ET-2013-0546; JE-2013-0582

DATE OF ISSUE May 31, 2013 DATE EFFECTIVE June 30, 2013
ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
NAME OF OFFICER TITLE ADDRESS

UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 86.1

CANCELLING MO.P.S.C. SCHEDULE NO. _____

SHEET NO. _____

APPLYING TO _____

MISSOURI SERVICE AREA

RIDER EDRR

ECONOMIC DEVELOPMENT AND RETENTION RIDER (Cont'd.)

APPLICABILITY (Cont'd.)

Service under this Rider shall be evidenced by a contract between the customer and the Company, which shall be submitted within ten days of execution to the Commission for informational purposes. The terms of the contract shall be held in confidence by the Commission, the customer or its agent, and the Company.

INCENTIVE PROVISIONS

The customer shall enter into a contract with the Company specifying the nature of the service to be provided, the discounts from standard tariffs to be applied, the term of the contract, and such other terms and conditions of service as are lawful and mutually agreeable. Revenues to be received from customer over the term of the contract shall be greater than the applicable incremental cost to provide electric service, as determined by the Company, ensuring a positive contribution to fixed costs. In no case shall the terms of the contract represent more than a 15% discount from otherwise applicable tariffs, before tax additions, nor shall the term of the contract extend more than five (5) years. If customer fails to fulfill the entire term of the contract, any agreed upon discounts shall become void and shall be repaid by customer.

TERM

This Rider shall immediately become void, and the Company shall have no further obligations or liabilities hereunder, if any term or terms of this Rider are determined to be discriminatory or otherwise unlawful by a court of competent jurisdiction.

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ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
NAME OF OFFICER TITLE ADDRESS

UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 87

CANCELLING MO.P.S.C. SCHEDULE NO. _____

SHEET NO. _____

APPLYING TO MISSOURI SERVICE AREA

RIDER ERR

ECONOMIC RE-DEVELOPMENT RIDER

PURPOSE

The purpose of this Economic Re-Development Rider is to encourage re-development of certain sites in the Company's service territory. Projects eligible for service under this Rider shall provide socio-economic benefits to the areas in which they locate as well as provide the Company with more efficient utilization of Company's existing infrastructure.

AVAILABILITY

Available, only at Company's option, to customers locating to previously vacant sites within the City of St. Louis and applying for electric service otherwise qualified for service under the Company's Service Classification 3(M) Large General Service Rate, 4(M) Small Primary Service Rate, or 11(M) Large Primary Service Rate. All Terms and Conditions of Company's tariffs shall apply to the service supplied to customer, except as modified by this Rider.

Availability of this Rider is subject to the following limitations:

1. Project shall have an estimated average monthly peak demand of at least 500 kW during each contract year under this Rider.
2. The Rider is available only for projects on sites that are within the designated areas of the City of St. Louis and defined on maps contained in this Rider.
3. This Rider is available for eligible load associated with an existing premises served or previously served by Company, provided the premises is either unoccupied or otherwise dormant (e.g. vacant land and/or buildings) for a minimum period of one hundred-eighty (180) days.
4. Electric service under this Rider is only available in conjunction with Federal, State, Regional or Local governmental economic development activities such as, but not limited to, Tax Increment Financing ("TIF"), Empowerment and Enterprise Zone incentives, brownfield tax credits, new market tax credits, etc., where these incentives have been offered and accepted by customer who is requesting service to locate new or expanding facilities within the aforementioned sites.
5. Service under this Rider is limited to loads, which in the Company's sole judgment, utilize existing infrastructure in a manner which is beneficial to the local electric service delivery system.
6. This Rider is not available to a successor customer that results merely from load shifted from one location on Company's system to a qualifying site, unless approved by Company.

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UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 87.1

CANCELLING MO.P.S.C. SCHEDULE NO. _____

SHEET NO. _____

APPLYING TO MISSOURI SERVICE AREA

RIDER ERR

ECONOMIC RE-DEVELOPMENT RIDER (Cont'd.)

INCENTIVE PROVISIONS

1. Facilities and Relocation Charges

In the presence of physical conflicts associated with any new construction or expansion of customer's premises or electrical load, Company may, at its sole discretion, upon customer's request, relocate any distribution facilities to a right-of-way acceptable to Company on or off customer's premises, following the payment by customer of the Company's estimated net cost of relocating its distribution facilities. The net relocation cost chargeable to customer may be offset in part by an amount not to exceed 50 percent (50%) of any net annual revenue estimated to be derived from customer's premises, and not utilized in meeting the Company's tariff provisions governing extensions to non-residential customers.

2. Discount from Standard Tariff

The customer shall enter into a contract with the Company specifying the character of the service to be provided and such other terms and conditions of service as are mutually agreeable. Customers meeting the criteria established in this tariff shall be eligible for a 15% discount from otherwise applicable base rate tariff charges, before application of taxes. Application of this discount provision is limited to customers whose average annual peak demand is at least 500 kW and whose annual load factor exceeds 55%. The discount shall remain in effect for up to 60 months and is not available for customers which are residential or retail in nature.

TERMS AND CONDITIONS

Customers participating in this Rider will be ineligible for participation in any other economic development, economic retention, or similar tariff of the Company.

Maps showing the locations qualifying for consideration under this Rider, subject to Company approval, are attached and part of this Rider.

Notwithstanding the above, this Rider shall immediately become void, and the Company shall have no further obligations or liabilities hereunder, if any term or terms of this Rider are determined to be discriminatory or otherwise unlawful by a court of competent jurisdiction.

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ISSUED BY	<u>Warner L. Baxter</u>	TITLE	<u>President & CEO</u>
	NAME OF OFFICER		ADDRESS
			<u>St. Louis, Missouri</u>

UNION ELECTRIC COMPANY

ELECTRIC SERVICE

M.O.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 87.2

CANCELLING M.O.P.S.C. SCHEDULE NO. _____

SHEET NO. _____

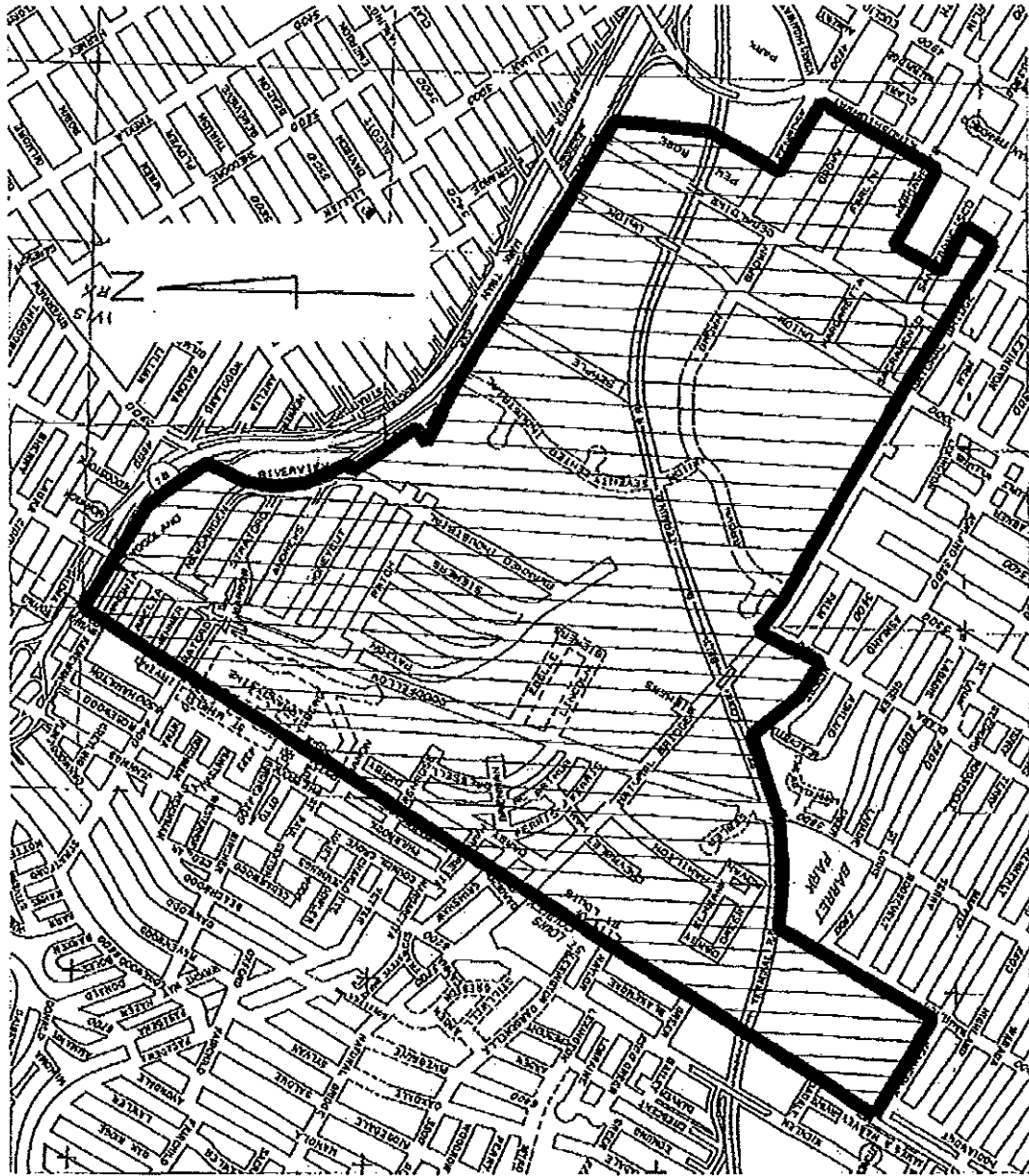
APPLYING TO _____

MISSOURI SERVICE AREA

RIDER ERR

ECONOMIC RE-DEVELOPMENT RIDER (Cont'd.)

City of St. Louis, Missouri:



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President & CEO
TITLE

St. Louis, Missouri
ADDRESS

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ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 87.3

CANCELLING MO.P.S.C. SCHEDULE NO.

SHEET NO.

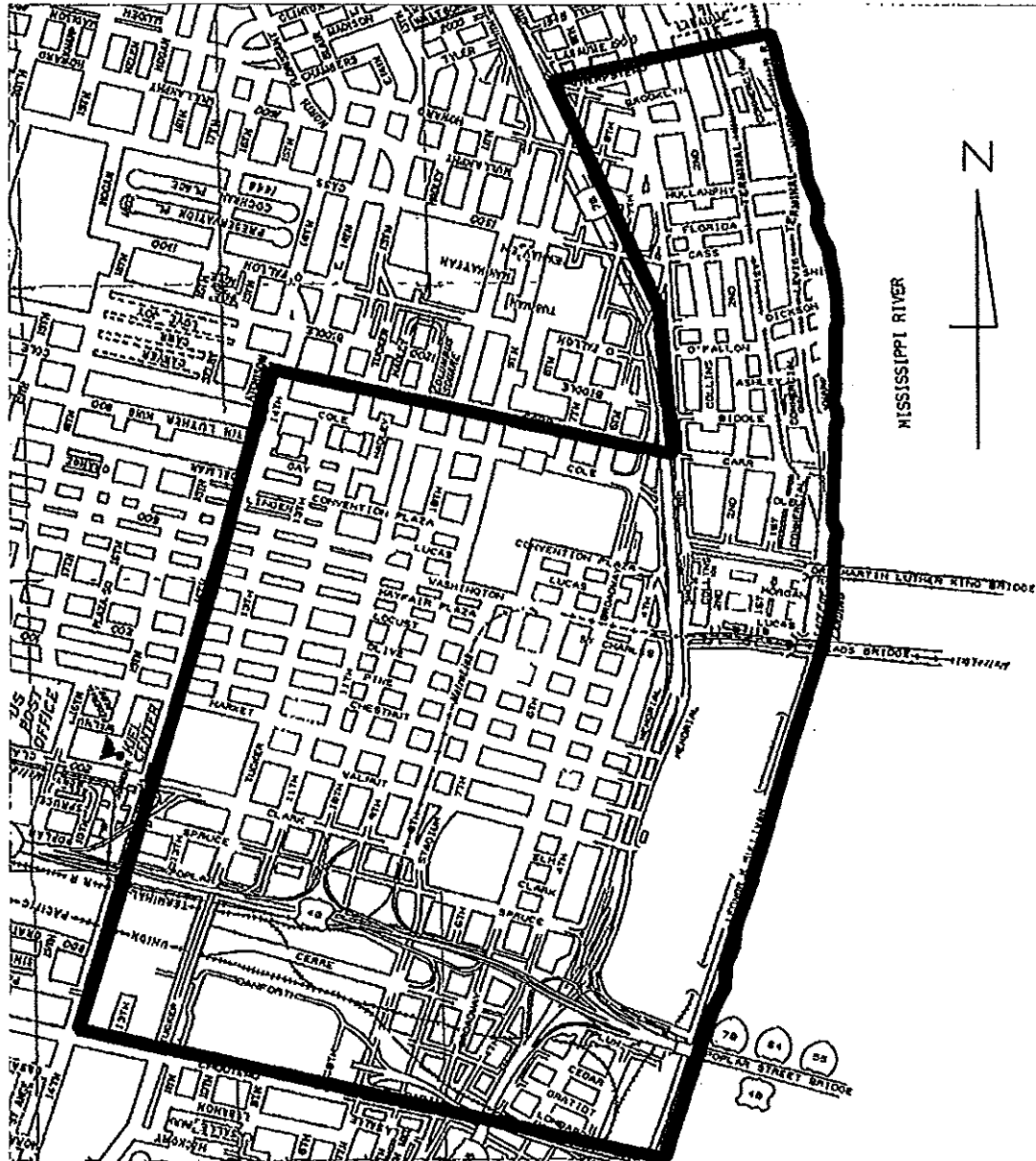
APPLYING TO

MISSOURI SERVICE AREA

RIDER ERR

ECONOMIC RE-DEVELOPMENT RIDER (Cont'd.)

City of St. Louis, Missouri:



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ISSUED BY Warner L. Baxter
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TITLE

St. Louis, Missouri
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ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 87.4

CANCELLING MO.P.S.C. SCHEDULE NO. _____

SHEET NO. _____

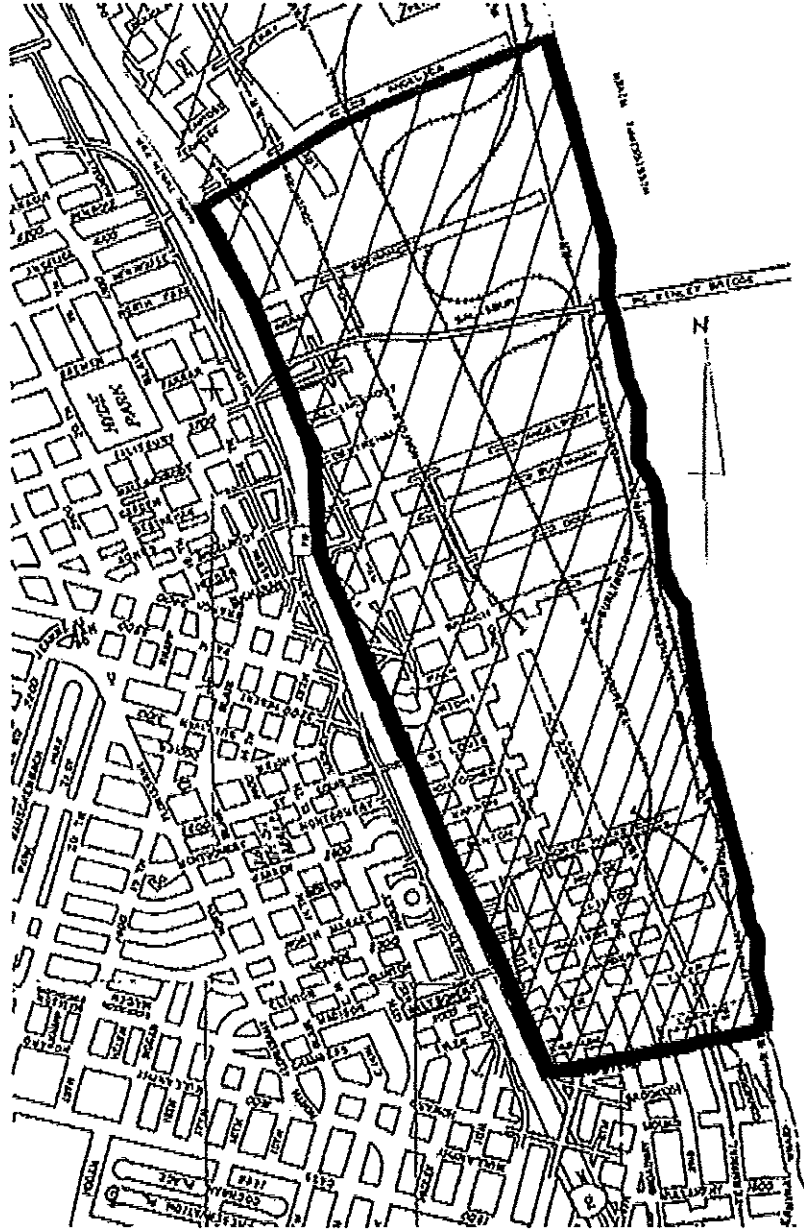
APPLYING TO _____

MISSOURI SERVICE AREA

RIDER ERR

ECONOMIC RE-DEVELOPMENT RIDER (Cont'd.)

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President & CEO
TITLE

St. Louis, Missouri
ADDRESS

UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 87.5

CANCELLING MO.P.S.C. SCHEDULE NO. _____

SHEET NO. _____

APPLYING TO MISSOURI SERVICE AREA

RIDER ERR

ECONOMIC RE-DEVELOPMENT RIDER (Cont'd.)

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KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No. 7 First Original Sheet No. 32
 Revised
Cancelling P.S.C. MO. No. 7 All previous sheets Original Sheet No. 32
 Revised
For Missouri Retail Service Area

ECONOMIC DEVELOPMENT RIDER Schedule EDR (FROZEN)

PURPOSE:

The purpose of this Economic Development Rider is to encourage industrial and commercial business development in Missouri.

AVAILABILITY:

Electric service under this Rider is only available in conjunction with local, regional and state governmental economic development activities where incentives have been offered and accepted by the Customer to locate new facilities or expand existing facilities in the Company's Missouri service area. For purposes of this Rider, a new facility shall be defined as a Customer's facility that has not received electric service in the Company's combined service area within the last twelve (12) months. Electric service under this Rider is only available to a Customer otherwise qualified for service under the Company's SGS, MGS, LGS, LPS, SGA, MGA or LGA rate schedules. Electric service under this Rider is not available in conjunction with service provided pursuant to any other special contract agreements.

The availability of this Rider shall be limited to industrial and commercial facilities not involved in selling or providing goods and services directly to the general public. Customers receiving service under this Rider must qualify under the criteria of this Rider or have been served under the superseded Rider on December 31, 1991. This Rider is not available to those Customers who have an EDR contract which has an effective date after the effective date of this tariff.

APPLICABILITY:

The Rider is applicable to new facilities or the additional separately metered facilities meeting the above availability criteria and the following two applicability criteria:

1. The annual load factor of the new Customer or additional facility is reasonably projected to equal or exceed the Company's annual system load factor within two (2) years of the date the Customer first receives service under this Rider. The projected annual Customer load factor shall be determined by the following relationship:

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KANSAS CITY POWER & LIGHT COMPANY

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 Revised
Cancelling P.S.C. MO. 7 All previous sheets Original Sheet No. 32A
 Revised
For Missouri Retail Service Area

ECONOMIC DEVELOPMENT RIDER Schedule EDR (FROZEN)

(continued)

APPLICABILITY: (Continued)

$$\frac{\text{PAE}}{\text{PCD} * \text{HRS}}$$

where:

- PAE = Projected Annual Energy (kWh)
- HRS = Hours in year (8760)
- PCD = Projected Customer Demand coincident with Company System Peak Demand.

If the above load factor criterion is not met, the Company may consider the following other factors when determining qualification for the Rider:

- a. The creation of 100 or more new permanent full-time jobs;
 - b. Capital investment of \$500,000 or more.
2. The peak demand of the new or additional facility is reasonably projected to be at least two-hundred (200) kW within two years of the date the Customer first receives service under this Rider.

All requests for service under this Rider will be considered by the Company. Sufficiently detailed information shall be provided, by the Customer, to enable the Company to determine whether a facility is qualified for the Rider. Service under this Rider shall be evidenced by a contract between the Customer and the Company, which shall be submitted to the Commission.

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~~November 8, 2013~~
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KANSAS CITY POWER & LIGHT COMPANY

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 Revised
Cancelling P.S.C. MO. 7 All previous sheets Original Sheet No. 32B
 Revised
For Missouri Retail Service Area

ECONOMIC DEVELOPMENT RIDER Schedule EDR (FROZEN)

(continued)

INCENTIVE PROVISIONS:

- Revenue Determination:**
The pre-tax revenues under this Rider shall be determined by reducing otherwise applicable charges, associated with the SGS, MGS, LGS, LPS, SGA, MGA, or LGA rate schedules, by 30% during the first contract year, 25% during the second contract year, 20% during the third contract year, 15% during the fourth contract year and 10% during the fifth contract year. After the fifth contract year, this incentive provision shall cease. All other billing, operational and related provisions of the aforementioned rate schedules shall remain in effect. The reductions under this Rider shall not apply to service rendered to the Customer during the three (3) months beginning with the first regular meter reading occurring on or after June 1 of each year.

Bills for separately metered service to existing Customers, pursuant to the provisions of this Rider, will be calculated independently of any other service rendered to the Customer at the same or other locations.
- Shifting of Existing Load:**
For Customers with existing facilities at one or more locations in the Company's combined service area, this Rider shall not be applicable to service provided at any other delivery point prior to receiving service under this Rider. Failure to comply with this provision may result in termination of service under this Rider.
- Local Service Facilities:**
The Company will not require a contribution in aid of construction for standard facilities installed to serve the Customer if the expected revenues from the new load are determined to be sufficient to justify the required investment in the facilities.

TERMINATION:

Failure of the Customer to meet any of the applicability criteria of this Rider, used to qualify the Customer for acceptance on the Rider, within two (2) years of the date service under this Rider begins, may lead to termination of service under this Rider.

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KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No. 7 Second Original Sheet No. 32C

Revised

Cancelling P.S.C. MO. No. 7 First Original Sheet No. 32C

Revised

For Missouri Retail Service Area

ECONOMIC DEVELOPMENT RIDER Schedule EDR (FROZEN)

(continued)

FORM OF CONTRACT

This Agreement is entered into as of this _____ day of _____, 200_, by and between Kansas City Power & Light Company (Company) and _____ (Customer).

WITNESSETH:

Whereas, Company has on file with the Public Service Commission of the State of Missouri (Commission) a certain Economic Development Rider (Rider), and;

Whereas, Customer is a new Customer, or has acquired additional separately metered facilities within the Company's service territory, and;

Whereas, Customer has furnished sufficient information to the Company to demonstrate that its new facilities or additional separately metered facilities (Facilities) satisfied the Availability and Applicability provisions of the Rider, and;

Whereas, Customer wishes to take electric service from the Company, and the Company agrees to furnish electric service to the Customer under this Rider and pursuant to all other applicable tariffs of the Company;

The Company and Customer agree as follows:

1. Service to the Customer's Facilities located at (address) _____, (city) _____, (state) _____, (county) _____ shall be pursuant to the Rider, all other applicable tariffs, and the Company's General Rules and Regulations Applying to Electric Service, as may be in effect from time to time and filed with the Commission.
2. Customer acknowledges that the rate reductions provided by the Rider do not apply to service rendered to the customer during the three (3) months beginning with the first regular meter reading occurring on or after June 1 of each year.
3. Customer further acknowledges that this Agreement is not assignable voluntarily by Customer, but shall nevertheless inure to the benefit of and be binding upon the Customer's successors by operation of law.

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Vice President, Regulatory Affairs

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KANSAS CITY POWER & LIGHT COMPANY

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 Revised
Cancelling P.S.C. MO. 7 All previous sheets Original Sheet No. 32D
 Revised
For Missouri Retail Service Area

ECONOMIC DEVELOPMENT RIDER
Schedule EDR (FROZEN) (continued)

FORM OF CONTRACT (continued)

4. Customer acknowledges that all information provided to the Company for the purpose of determining whether the Customer is eligible for service under the Rider shall be retained by the Company, and shall be subject to inspection and disclosure under Chapters 386 and 393, RSMo 1986, as amended from time to time. Should the Customer designate any of such information as proprietary or confidential, Company shall notify Customer of any request for inspection or disclosure, and shall use good faith efforts to secure an agreement or Commission order protecting the proprietary or confidential nature of such information.

5. This Agreement shall be governed in all respects by the laws of the State of Missouri (regardless of conflict of laws provisions), and by the orders, rules and regulations of the Commission as they may exist from time to time. Nothing contained herein shall be construed as divesting, or attempting to divest, the Commission of any rights jurisdiction, power or authority vested in it by law.

In witness whereof, the parties have signed this Agreement as of the date first above written.

Kansas City Power & Light Company

Customer

By _____

By _____

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ISSUED BY: Darrin R. Ives
Vice President, Regulatory Affairs

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~~November 8, 2013~~
Kansas City, Mo.

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KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No. 7 Original Sheet No. 32E

Revised

Cancelling P.S.C. MO. No. _____ Original Sheet No. _____

Revised

For Missouri Retail Service Area

ECONOMIC DEVELOPMENT RIDER Schedule EDR

PURPOSE:

The purpose of this Economic Development Rider is to encourage industrial and commercial business development in Missouri and retain existing load where possible. These activities will attract capital expenditures to the State, diversify the Company's customer base, create jobs and serve to improve the utilization efficiency of existing Company facilities.

AVAILABILITY:

Electric service under this Rider is only available in conjunction with local, regional and state governmental economic development activities where incentives have been offered and accepted by the Customer to locate new facilities, expand existing facilities, or retain existing facilities in the Company's service area. The qualifying load under this Rider shall be the entire load of a Customer's new facilities, the incremental new load of an existing Customer, or the portion of an existing Customer's load for which exit from the Company's service area is imminent. For purposes of this Rider, a new facility shall be defined as a Customer's facility that has not received electric service in the Company's service area within the last twelve (12) months. Electric service under this Rider is only available to a Customer otherwise qualified for service under the Company's MGS, LGS, LPS, MGA or LGA rate schedules. Electric service under this Rider is not available in conjunction with service provided pursuant to any other Special Contract Service tariff agreements.

This Rider is not available for customers shifting loads between either KCP&L Greater Missouri Operations Company ("GMO") or Kansas City Power & Light Company ("KCP&L"), unless the customer's search and consideration for moving includes viable electric supply options in other electric utility service territories. In such cases, the Company will verify the availability of such supply options and Customer's intent prior to making the Rider available to the Customer.

The availability of this Rider shall be limited to industrial and commercial facilities which are not in the business of selling or providing goods and/or services directly to the general public.

APPLICABILITY:

The Rider is applicable to new or existing facilities meeting the above availability criteria and the following two applicability criteria:

1. The annual load factor of the new Customer facility or expanded facility is reasonably projected to equal or exceed a fifty-five percent (55%) annual load factor within two (2) years of the date the Customer first receives service under this Rider. The Customer must maintain an annual load factor of 55% or greater in years three (3) through five (5) of the service under this Rider to continue to be eligible for the incentive provisions. The projected annual Customer load factor shall be determined by the following relationship:

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KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No. 7 Original Sheet No. 32F
 Revised
Cancelling P.S.C. MO. No. _____ Original Sheet No. _____
 Revised
For Missouri Retail Service Area

ECONOMIC DEVELOPMENT RIDER Schedule EDR

(continued)

APPLICABILITY: (Continued)

$$\frac{PAE}{PCD * HRS}$$

where:

PAE = Projected Annual Energy (kWh)
HRS = Hours in year (8760)
PCD = Projected Customer Peak Demand

If the above load factor criterion is not met, the Company may consider the following other factors when determining qualification for the Rider:

- a. 100 or more new permanent full-time jobs created or percentage increase in existing permanent full-time jobs;
- b. Capital investment of \$5 million or more
- c. Additional Off-peak Usage

Any of the above alternate factors considered will be documented as part of the approval process. Revenues to be received from a Customer over the term of the contract shall be greater than the applicable incremental cost to provide electric service, as determined by the Company pursuant to Sheet Nos. 32I and 32J, ensuring a positive contribution to fixed costs.

2. The peak demand of the new or additional facility is reasonably projected to be at least two-hundred (200) kW within two years of the date the Customer first receives service under this Rider. The Customer must maintain at least two-hundred (200) kW in years three (3) through five (5) of the service under this Rider to continue to be eligible for the incentive provisions.

All requests for service under this Rider will be considered by the Company. Sufficiently detailed information and documentation shall be provided by the Customer to enable the Company to determine whether a facility is qualified for the Rider.

In the case of retention of an existing Customer, as a condition for service under this Rider, Customer must furnish to Company such documentation (e.g. influencing factors and a comparison of the rates and other economic development incentives) as deemed necessary by Company to verify the availability of a viable electric supply option outside of KCP&L's service territory and Customer's intent to select this viable electric supply option. Customer must also furnish an affidavit stating Customer's intent to select this viable electric supply option unless it is able to receive service under this Rider.

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KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No. 7 Original Sheet No. 32G
 Revised
Cancelling P.S.C. MO. No. _____ Original Sheet No. _____
 Revised
For Missouri Retail Service Area

ECONOMIC DEVELOPMENT RIDER Schedule EDR

(continued)

In the case of shifting of a customer's load between GMO and KCP&L, Customer must furnish to Company such documentation (e.g. Influencing factors and a comparison of the rates and other economic development incentives) as deemed necessary by Company to verify Customer's intent and the availability of a viable electric supply option outside of the service territories of GMO and KCP&L. Customer must also furnish an affidavit stating Customer's intent to select this viable electric supply option unless it is able to receive service under this Rider.

Service under this Rider shall be evidenced by a contract between the Customer and the Company, which shall be submitted along with supporting documentation to the Commission, Commission Staff in the Energy Unit and the Office of Public Counsel. In the case of a Customer locating a new facility in KCP&L's service territory or expanding an existing facility in KCP&L's service territory, the contract will contain a statement that the Customer would not locate new facilities in KCP&L's service territory or expand its existing facilities in KCP&L's service territory but for receiving service under this Rider along with other incentives.

INCENTIVE PROVISIONS:

- Revenue Determination:**
The pre-tax revenues under this Rider shall be determined by reducing otherwise applicable charges, associated with the, MGS, LGS, LPS, , MGA, or LGA rate schedules, by 30% during the first contract year, 25% during the second contract year, 20% during the third contract year, 15% during the fourth contract year and 10% during the fifth contract year. After the fifth contract year, this incentive provision shall cease unless provision #3 below applies. If elected by the Customer and approved by the Company before the EDR contract is executed, the Company may determine to alter the application of the discount percentages over the course of the five (5) years not exceeding 100% total and not exceed 30% in any single year. The selected discount percentage cannot change once signed as part of the contract. All other billing, operational and related provisions of the aforementioned rate schedules shall remain in effect.

Bills for separately metered (or measured) service to existing Customers, pursuant to the provisions of this Rider, will be calculated independently of any other service rendered to the Customer at the same or other locations.

- Shifting of Existing Load:**
For Customers with existing facilities at one or more locations in the Company's service area, this Rider shall not be applicable to service provided at any other delivery point prior to receiving service under this Rider. Failure to comply with this provision may result in termination of service under this Rider.

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KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No. 7

Original

Sheet No. 32H

Revised

Cancelling P.S.C. MO. No. _____

Original

Sheet No. _____

For Missouri Retail Service Area

3. Beneficial Location of Facilities:

If the Company determines at the time of the approval of the EDR that loads under this Rider utilize existing infrastructure in a manner which is beneficial to the local electric service delivery system, an additional incentive of up to 10% reduction during the 6th year can be applied to the pre-tax charges associated with the Customer's rate schedule. Documentation supporting the approval of this provision including relevant circuit utilization information will be provided with the contract and other supporting documentation submitted to the Commission, Commission Staff in the Energy Unit and Office of Public Counsel for information purposes. This provision does not apply for the retention of Customers.

4. Positive Contribution:

Revenues to be received from a Customer over the term of the contract shall be greater than the applicable incremental cost to provide electric service, as determined by the Company pursuant to Sheet Nos. 32I and 32J, ensuring a positive contribution to fixed costs.

5. Separately Measured Service:

For facilities contracting under this Rider due to expansion, the Company may install metering equipment necessary to measure load subject to this Rider. The Company reserves the right to make the determination of whether such load will be separately metered or sub-metered. If the Company determines that the nature of the expansion is such that either separate metering or sub-metering is impractical or economically infeasible, the Company will determine, based on historical usage, what portion of the Customer's load in excess of the monthly baseline, if any, qualifies as new load eligible for this Rider.

TERMINATION:

Failure of the Customer to meet any of the applicability criteria of this Rider, used to qualify the Customer for acceptance on the Rider shall lead to termination of service under this Rider.

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KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No. 7 Original Sheet No. 32I

Revised

Cancelling P.S.C. MO. No. _____ Original Sheet No. _____

For Missouri Retail Service Area

INCREMENTAL COST ANALYSIS:

As confirmation that revenues received from Customers under this Schedule are expected to be sufficient to cover the Company's increased costs to serve such Customers, the Company shall provide to the Commission, Commission Staff in the Energy Unit and Office of Public Counsel an analysis of the Company's incremental cost of service in a format set forth in Sheet No. 32J. This analysis shall be provided at the time of the Company's triennial and annual updates filed under the Commission's Chapter 22 Electric Utility Resource Planning Rules.

This analysis shall be performed utilizing an hourly production cost simulation model such as Midas or equivalent along with current estimates of the market value of capacity. The incremental costs shall include the estimated cost of serving a 10 MW incremental retail electric customer load at varying load factors. The incremental cost shall include the impact of such retail load on the Company's purchased power costs, fuel costs, incremental capacity costs and wholesale sales. This analysis shall generally be forward looking, covering the current calendar year and subsequent four (4) calendar years and include the impact of the Company's view of forward wholesale energy market prices.

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KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No. 7 Original Sheet No. 32J

Revised

Cancelling P.S.C. MO. No. _____ Original Sheet No. _____

For Missouri Retail Service Area

INCREMENTAL ANNUAL COST PER KWH:

KCP&L Incremental Cost Analysis Study by Load Factor
(per procedure documented in KCP&L 32I and GMO 123.4)

Load Factor :		20%	30%	40%	50%	60%	70%	80%	90%	100%
Year: \$0.00/kwh										
Year: \$0.00/kwh										
Year: \$0.00/kwh										
Year: \$0.00/kwh										

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Schedule JEL-1 Page 22

STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 1

Original Sheet No. 123,1

Canceling P.S.C. MO. No. _____

Sheet No. _____

KCP&L Greater Missouri Operations Company
KANSAS CITY, MO

For Territory Served by L&P and MPS

**ECONOMIC DEVELOPMENT RIDER
ELECTRIC**

PURPOSE

The purpose of this Economic Development Rider is to encourage industrial and commercial business development in Missouri and retain existing load where possible. These activities will attract capital expenditures to the State, diversify the Company's customer base, create jobs, and serve to improve the utilization efficiency of existing Company facilities.

AVAILABILITY

Electric service under this Rider is only available in conjunction with local, regional and state governmental economic development activities where incentives have been offered and accepted by the Customer to locate new facilities, expand existing facilities, or retain existing facilities in the Company's service area. The qualifying load under this Rider shall be the entire load of a Customer's new facilities, the incremental new load of an existing Customer, or the portion of an existing Customer's load for which exit from the Company's service area is imminent. For purposes of this Rider, a new facility shall be defined as a Customer's facility that has not received electric service in the Company's service area within the last twelve (12) months. Electric service under this Rider is only available to a Customer otherwise qualified for service under the Company's Medium General Service, Large General Service, or Large Power Service rate schedules. Electric service under this Rider is not available in conjunction with service provided pursuant to any other Special Contract Rate tariff agreements.

This Rider is not available for customers shifting loads between either KCP&L Greater Missouri Operations Company ("GMO") or Kansas City Power & Light Company ("KCP&L"), unless the customer's search and consideration for moving includes viable electric supply options in other electric utility service territories. In such cases, the Company will verify the availability of such supply options and Customer's intent prior to making the Rider available to the Customer.

The availability of this Rider shall be limited to industrial and commercial facilities which are not in the business of selling or providing goods and/or services directly to the general public.

APPLICABILITY

The Rider is applicable to new or existing facilities meeting the above availability criteria and the following two applicability criteria:

1. The annual load factor of the new Customer facility or expanded facility is reasonably projected to equal or exceed fifty-five percent (55%) annual load factor within two (2) years of the date the Customer first receives service under this Rider. The Customer must maintain an annual load factor of 55% or greater in years three (3) through five (5) of the service under this Rider to continue to be eligible for the incentive provisions. The projected annual Customer load factor shall be determined by the following relationship:

$$\frac{\text{PAE}}{\text{PCD} * \text{HRS}}$$

where:

- PAE = Projected Annual Energy (kWh)
- HRS = Hours in year (8760)
- PCD = Projected Customer Peak Demand

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STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 1 Original Sheet No. 123.2
Canceling P.S.C. MO. No. _____ Sheet No. _____
KCP&L Greater Missouri Operations Company For Territory Served by L&P and MPS
KANSAS CITY, MO

ECONOMIC DEVELOPMENT RIDER (Continued)
ELECTRIC

If the above load factor criterion is not met, the Company may consider the following other factors when determining qualification for the Rider:

- a. 100 or more new permanent full-time jobs created or percentage increase in existing permanent full-time jobs;
- b. Capital investment of \$5 million or more
- c. Additional Off-peak Usage

Any of the above alternative factors considered will be documented as part of the approval process. Revenues to be received from a Customer over the term of the contract shall be greater than the applicable incremental cost to provide electric service, as determined by the Company pursuant to Sheet Nos. 123.5 and 123.6, ensuring a positive contribution to fixed costs.

2. The peak demand of the new or additional facility is reasonably projected to be at least two-hundred (200) kW within two years of the date the Customer first receives service under this Rider. The Customer must maintain at least two-hundred (200) kW in years three (3) through five (5) of the service under this Rider to continue to be eligible for the incentive provisions.

All requests for service under this Rider will be considered by the Company. Sufficiently detailed information and documentation shall be provided by the Customer to enable the Company to determine whether a facility is qualified for the Rider.

In the case of retention of an existing Customer, as a condition for service under this Rider, Customer must furnish to Company such documentation (e.g. Influencing factors and a comparison of the rates and other economic development incentives) as deemed necessary by Company to verify the availability of a viable electric supply option outside of GMO's service territory and Customer's intent to select this viable electric supply option. Customer must also furnish an affidavit stating Customer's intent to select this viable electric supply option unless it is able to receive service under this Rider.

In the case of shifting of a customer's load between GMO and KCP&L, Customer must furnish to Company such documentation (e.g. Influencing factors and a comparison of the rates and other economic development incentives) as deemed necessary by Company to verify Customer's intent and the availability of a viable electric supply option outside of the service territories of GMO and KCP&L. Customer must also furnish an affidavit stating Customer's intent to select this viable electric supply option unless it is able to receive service under this Rider.

Service under this Rider shall be evidenced by a contract between the Customer and the Company, which shall be submitted along with supporting documentation to the Commission, Commission Staff in the Energy Unit and the Office of Public Counsel. In the case of a Customer locating a new facility in GMO's service territory or expanding an existing facility in GMO's service territory, the contract will contain a statement that the Customer would not locate new facilities in GMO's service territory or expand its existing facilities in GMO's service territory but for receiving service under this Rider along with other incentives.

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STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 1 Original Sheet No. 123.3
Canceling P.S.C. MO. No. _____ Sheet No. _____
KCP&L Greater Missouri Operations Company For Territory Served by L&P and MPS
KANSAS CITY, MO

ECONOMIC DEVELOPMENT RIDER (Continued)
ELECTRIC

INCENTIVE PROVISIONS

1. Revenue Determination:

The pre-tax revenues under this Rider shall be determined by reducing otherwise applicable charges, associated with the Medium General Service, Large General Service, or Large Power Service rate schedules, by 30% during the first contract year, 25% during the second contract year, 20% during the third contract year, 15% during the fourth contract year and 10% during the fifth contract year. After the fifth contract year, this incentive provision shall cease unless provision #3 below applies. If elected by the Customer and approved by the Company before the EDR contract is executed, the Company may determine to alter the application of the discount percentages over the course of the five (5) years not exceeding 100% total and not to exceed 30% in any single year. The selected discount percentage cannot change once signed as part of the contract. All other billing, operational and related provisions of the aforementioned rate schedules shall remain in effect.

Bills for separately metered (or measured) service to existing Customers, pursuant to the provisions of this Rider, will be calculated independently of any other service rendered to the Customer at the same or other locations.

2. Shifting of Existing Load:

For Customers with existing facilities at one or more locations in the Company's service area, this Rider shall not be applicable to service provided at any other delivery point prior to receiving service under this Rider. Failure to comply with this provision may result in termination of service under this Rider.

3. Beneficial Location of Facilities:

If the Company determines at the time of the approval of the EDR that loads under this Rider utilize existing infrastructure in a manner which is beneficial to the local electric service delivery system, an additional incentive of up to 10% reduction during the 6th year can be applied to the pre-tax charges associated with the Customer's rate schedule. Documentation supporting the approval of this provision including relevant circuit utilization information will be provided with the contract and other supporting documentation submitted to the Commission, Commission Staff in the Energy Unit and Office of Public Counsel for information purposes. This provision does not apply for the retention of Customers.

4. Positive Contribution:

Revenues to be received from a Customer over the term of the contract shall be greater than the applicable incremental cost to provide electric service, as determined by the Company pursuant to Sheet Nos. 123.5 and 123.6, ensuring a positive contribution to fixed costs.

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P.S.C. MO. No. 1 Original Sheet No. 123.4
Canceling P.S.C. MO. No. _____ Sheet No. _____
KCP&L Greater Missouri Operations Company For Territory Served by L&P and MPS
KANSAS CITY, MO

ECONOMIC DEVELOPMENT RIDER (Continued)
ELECTRIC

INCENTIVE PROVISIONS (cont.)

- 5 Separately Measured Service:
For facilities contracting under this Rider due to expansion, the Company may install metering equipment necessary to measure load subject to this Rider. The Company reserves the right to make the determination of whether such load will be separately metered or sub-metered. If the Company determines that the nature of the expansion is such that either separate metering or sub-metering is impractical or economically infeasible, the Company will determine, based on historical usage, what portion of the Customer's load in excess of the monthly baseline, if any, qualifies as new load eligible for this Rider.

TERMINATION

Failure of the Customer to meet any of the applicability criteria of this Rider, used to qualify the Customer for acceptance on the Rider shall lead to termination of service under this Rider.

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STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 1 Original Sheet No. 123.5
Canceling P.S.C. MO. No. _____ Sheet No. _____
KCP&L Greater Missouri Operations Company For Territory Served by L&P and MPS
KANSAS CITY, MO

ECONOMIC DEVELOPMENT RIDER (Continued)
ELECTRIC

INCREMENTAL COST ANALYSIS:

As confirmation that revenues received from Customers under this Schedule are expected to be sufficient to cover the Company's increased costs to serve such Customers, the Company shall provide to the Commission, Commission Staff in the Energy Unit and Office of Public Counsel an analysis of the Company's incremental cost of service in a format set forth in Sheet No. 123.6. This analysis shall be provided at the time of the Company's triennial and annual updates filed under the Commission's Chapter 22 Electric Utility Resource Planning Rules.

This analysis shall be performed utilizing an hourly production cost simulation model such as Midas or equivalent along with current estimates of the market value of capacity. The incremental costs shall include the estimated cost of serving a 10 MW incremental retail electric customer load at varying load factors. The incremental cost shall include the impact of such retail load on the Company's purchased power costs, fuel costs, incremental capacity costs and wholesale sales. This analysis shall generally be forward looking, covering the current calendar year and subsequent four (4) calendar years and include the impact of the Company's view of forward wholesale energy market prices.

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STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 1

Original Sheet No. 123.6

Canceling P.S.C. MO. No. _____

Sheet No. _____

KCP&L Greater Missouri Operations Company
KANSAS CITY, MO

For Territory Served by L&P and MPS

ECONOMIC DEVELOPMENT RIDER (Continued)
ELECTRIC

INCREMENTAL ANNUAL COST PER KWH:

GMO Incremental Cost Analysis Study by Load Factor
(per procedure documented in KCP&L 321 and GMO 123.4)

Load Factor	20%	30%	40%	50%	60%	70%	80%	90%	100%
Year: \$0.00/kwh									
Year: \$0.00/kwh									
Year: \$0.00/kwh									
Year: \$0.00/kwh									
Year: \$0.00/kwh									

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RIDER 677
ECONOMIC DEVELOPMENT RIDER

No. 1 of 3 Sheets

TO WHOM AVAILABLE

This Rider shall be applicable to the Rate Schedules as defined in Appendix A.

This Economic Development Rider is available to Industrial and Commercial Customers for new or increased service requirements that result in increased employment opportunities, which are new to the State of Indiana and whose plants are located adjacent to existing electric facilities having capacity sufficient to meet the Customer's requirements. Applicants must demonstrate that, absent the availability of this Rider, this new service requirement and any related employment opportunities would be located outside the Company's electric service territory. Increased service requirements which displace or duplicate existing load in the Company's service territory or are brought about by the shutdown of cogeneration facilities will not qualify under this Rider.

For Customers that were taking service from the Company under Economic Development Rider 848.2 prior to the effective date of this Rider 677, service under this Rider 677 shall terminate upon the expiration of the contract existing between the Customer and the Company.

For new Customers, service under this Rider shall commence upon the effective date of a contract between the Company and the Customer providing for service under the appropriate Rate Schedule between the Customer and the Company and shall terminate upon the earliest of: (1) the contract term; or (2) upon the effective date of new base rates resulting from a Commission Order in a base rate case.

CONTRACT

Service under this Rider requires a contract between the Customer and the Company. The contract shall set forth monthly base period kilowatts and kilowatt hours, which shall be deemed those actually used during the preceding twelve (12) months. If new or increased Company facilities are required, the Customer shall be responsible for same in compliance with the Company's General Rules and Regulations applicable to electric service in effect at the time of the contract execution.

RATE

For qualifying existing Customers with electric service and Energy supplied by the Company, other than that accounted for in a completed contract under the terms and conditions of this Economic Development Rider (where applicable), the existing Energy requirements shall be deemed the Customer's base load and will be billed on the appropriate Rate Schedule. For the Energy requirements of qualifying new Customers, and for the non-base load service and Energy requirements of existing Customers, a discount on monthly billings for all applicable purchases shall be applied in accordance with the following criteria for bills issued during the respective months starting from contract commencement date:

Issued Date
12/21/2011

Effective Date
12/27/2011

RIDER 677
ECONOMIC DEVELOPMENT RIDER

No. 2 of 3 Sheets

RATE (continued)

Year 1 Contract	Up to 50% of the increased base rate charges
Year 2 Contract	Up to 40% of the increased base rate charges
Year 3 Contract	Up to 30% of the increased base rate charges
Year 4 Contract	Up to 20% of the increased base rate charges
Year 5 Contract	Up to 10% of the increased base rate charges

As an alternative to the above discount tiers and at the Company's sole discretion, the Company may elect to offer up to 30% per year over the 5-year contract period.

In no event, however, shall the incremental revenues derived from the discounted base rate charges, as stated above for serving the new or increased load, be allowed by the Company to be less than the Company's marginal Energy costs, plus the marginal capacity costs, to serve said load or the minimum billing provisions of the base rate.

At the completion of the Rider contract term, the Energy supplied in accordance with this Rider will be furnished under the appropriate Rate Schedule in accordance with the contract between the Company and the Customer.

The size and duration of discounts on monthly bills will be determined on an individual Customer basis given the degree of fulfillment of the following criteria. The determination of monthly discounts to be applied will be at the sole discretion of the Company, but such discounts will vary with the number and extent to which the listed criteria are met by Customer's proposed new or expanded load. The Company will monitor the awarding of all contracts to insure the fulfillment by the Customer of all terms and conditions of the contract associated with the award. Nonfulfillment of contract terms and conditions is grounds for reopening and reevaluation of all contract terms and conditions. Confidentiality shall be maintained regarding the terms and conditions of any completed contract as well as all Customer negotiations, successful or otherwise.

ELIGIBILITY THRESHOLDS

Unless otherwise noted, the criteria listed as follows will be used in determining the eligibility for the awarding of incentives under the terms and conditions of this Rider. Flexibility in the use of these criteria is at the sole discretion of the Company.

1. Full-time equivalent job creation per project: minimum 10.
2. New electrical Demand: minimum 100 kW.
3. Customer documentation/certification to be provided noting "Customer is considering other specific electric service territories as alternate locations for their planned new facility or expansion."

Issued Date
9/17/2014

Effective Date
9/17/2014

RIDER 677
ECONOMIC DEVELOPMENT RIDER

No. 3 of 3 Sheets

QUALIFYING CRITERIA

Incentives awarded under the terms and conditions of this Rider to eligible Customers as determined by the Company using the guidelines as listed above in Eligibility Thresholds shall be dependent upon the number and degree of fulfillment attained of the following criteria. The Company shall have the final determination of all incentives based on the determination of issues deemed most beneficial to all stakeholders.

Economic and/or Environmental Distress

- a. Brown field site development. For purposes of this Rider, a brownfield shall be areas of NIPSCO's territory where existing transmission and distribution facilities are not at capacity and limited new facilities would be required for new business.
- b. Above-county-average wage to be paid by prospect.
- c. Other Indiana "Accelerating Growth" Guidelines, or Future State of Indiana Economic Development Goals.
- d. Any federal, state or local incentives and the degree thereof.

Power Use Characteristics

- a. High-efficiency, end-use equipment and construction technologies.
- b. "Clean Power" usage considerations.
- c. High load-factor operations

Site Specific Discounts

- a. Community master plan compliance.
- b. Industrial park location where municipal utilities, zoning and streets already exist.
- c. Utilization of existing industrial sites.
- d. Proximity to existing Company facilities.
- e. Loading of existing Company facilities.

Number of Jobs Created

Full-time equivalent job creation per project.

Issued Date
12/21/2011

Effective Date
12/27/2011

ECONOMIC DEVELOPMENT PROGRAM RIDER
(Experimental)

ELECTRIC

1. Effective In

The Economic Development Program Rider ("Rider") is available in all territory served by Wisconsin Power and Light Company ("the Company").

2. Availability

This Rider is available to all customers served, or to be served, under Rate Schedules CP-1, or CP-2, that meet all of the following additional conditions:

- This Rider is applicable to New or Incremental Load Customers:
 - The incremental load added by new customers, or
 - The incremental load added by existing customers relative to prior calendar year load levels for that customer.
- With the prior approval of the Public Service Commission of Wisconsin ("the Commission" or "the PSCW") this Rider may be applicable to existing customers in economic distress that have legitimate opportunities to move operations out of Wisconsin ("Load Retention Customers"). Applicability of the Rider to Load Retention Customers will be based upon the Commission's review of the customer's financial status and the customer's opportunities to move operations out of Wisconsin and any other factors as determined by Commission.
- The customer must have qualified to receive, and have received local, county, State of Wisconsin or federal financial assistance for economic development or economic stimulus. The minimum value of the economic development assistance from a local, county, State of Wisconsin, or federal entity that the customer has received must be no less than \$ 500,000. The last page of this Rider provides a listing of qualifying economic development programs
 - For New or Incremental Load Customers, the customer must have received the assistance for the specific project that adds incremental load before it first accepts service under this Rider.
 - For Load Retention Customers, the customer must have received economic development assistance from a local, county, State of Wisconsin, or federal entity within the 24 months prior to the customer qualifying for this Rider.

This Rider is not available to customers or potential customers transferring load from a different electricity provider in Wisconsin to Wisconsin Power and Light Company.

This is an experimental pilot tariff rider program. The terms and conditions of this tariff may be modified outside of a rate proceeding, subject to approval by the PSCW.

3. Load Applicable to the Rider

- Incremental Load Customers
 - i. The base level of load for an Incremental Load Customer is the customer's energy consumption for each month of the prior calendar year.
 - ii. If the customer's energy consumption for a month in the current year exceeds

**ECONOMIC DEVELOPMENT PROGRAM RIDER
(Experimental)**

ELECTRIC

the customer's energy consumption for the same month of the base year, the additional kilowatt-hours are incremental load that qualifies for the Rider.

iii. The customer need not have incremental load every month of the year, but at the end of each 12-month period that the customer has been on the Rider, the Company shall determine whether the customer's total incremental load for the entire twelve months exceeds the annual base level. If not, the customer is disqualified from the Rider.

- **New Customers**
 - i. All electric load from the customer's new facilities in Wisconsin qualifies as incremental.
- **Load Retention Customers**
 - i. The Commission reserves the right to decide how much load qualifies for the Rider when it reviews the customer's application and approves the customer's qualification for the Rider.

4. Rate

The rates established for each customer's incremental load will be based upon the applicable Cp-1, Cp-1A, Cp-1B, Cp-2, Cp-2A or Cp-2B rate schedules. The rates will be discounted such that the individual customer's rates for the first year of eligibility cover a floor price that reflects 105% of the marginal cost of serving the customer's incremental load, as determined on an individual customer basis.

The level of discount initially available under this Rider shall decline by an equivalent prorated reduction over each year of the contract term such that at the end of the contract the customer's rates shall be the tariff rates in force at such time.

Customer rates for incremental load under this Rider shall be updated for all changes to tariff rates, including fuel cost surcharges or fuel cost credits.

The calculation of the floor price shall consider any other discounts applicable to the customer and shall consider expected load curves and on-peak / off-peak energy usage projections.

Marginal costs consists of the following cost components:

- energy at marginal rate levels equal to the projected Locational Marginal Price (LMP) forecasts underlying in the approved fuel cost projections from the most recent WPL base rate case, or base rate case re-opener proceeding
- marginal transmission and distribution losses
- transmission charges
- applicable distribution charges
- energy efficiency charges under Act 141
- gross receipts taxes.

5. Overall Subscription Limitations (\$5,000,000)

This pilot program is intended to be limited to a total annual level of discounts totaling no more than five million dollars on a cumulative annual basis during the pilot program period unless

ECONOMIC DEVELOPMENT PROGRAM RIDER
(Experimental)

ELECTRIC

specifically authorized by the Commission to exceed that amount.

The Company may offer this pilot program until December 31st, 2014. Contracts entered into during this pilot program shall be effective until their termination.

(R)

6. Contract & Enrollment Period

Agreement to subscribe to this tariff will be established under a written contract between the customer and the Company. Customers with a signed contract may remain on the tariff for a term of up-to 5 years from the date of full commercial operation. Full commercial operation must be achieved within 12 months from the date of the signed contract, unless both parties mutually agree to extend that time period. Accommodations can be made for phased projects, additions, rehabilitation, and upgrading as mutually agreed between the customer and the Company.

7. Affidavit Requirement

To be eligible for this Rider a New or Incremental Load Customer shall sign an affidavit, attesting to the fact that "but for" the rate discounts available under this Rider, either on its own or in combination with a package of economic development or job creation incentives from local, county, State of Wisconsin, or federal programs the customer would not have located operations or added load within Wisconsin Power and Light Company's service territory.

In order to be eligible for this Rider, a customer in economic distress (Load Retention Customer) that is seeking to retain its existing load shall sign an affidavit, attesting to the fact that "but for" the rate discounts available under this Rider, either on its own or in combination with a package of economic development or job creation incentives from local, county, State of Wisconsin, or federal programs, the customer would be reducing its energy consumption, shutting facilities in Wisconsin Power and Light Company's service territory in Wisconsin, or leaving Wisconsin.

8. Sustained Operation Provision

Customer shall be required to enter into an agreement with the Company that in the event that a Customer receiving discounted rates for incremental load under this Rider fails to sustain its operations and reduces its load below the base level established when it first qualified for this Rider (see paragraph 3) during the term of the contract, the Customer will be disqualified from receipt of discounted rates under this rider for the remainder of the contract term, and the contract shall be terminated. In addition, the customer shall be required to reimburse to the Company an amount equivalent to the discounts received in the most recent two years that the customer was on the Rider.

9. Energy Efficiency and Demand Side Management Requirements

In order to be eligible for this Rider the Customer shall be required to meet with Focus on Energy, and the Company's Shared Savings representatives to identify economically viable energy efficiency and demand side management opportunities. The Customer shall participate in or implement all economically viable programs or projects that have a projected pay-back period of five years or less. The Customer shall implement all such programs or projects within the contract term for service under this Rider. The Customer may request an independent economic analysis of the economic viability of such programs or projects, at the Customer's

**ECONOMIC DEVELOPMENT PROGRAM RIDER
(Experimental)**

ELECTRIC

contract term for service under this Rider. The Customer may request an independent economic analysis of the economic viability of such programs or projects, at the Customer's cost.

10. Miscellaneous

- The customer must follow and meet all other conditions applicable to receipt of service under tariffed rate schedules as applicable
- Discount percentages calculated prior to the provision of service based on load forecasts from the customer shall be reviewed each calendar year and the floor rate shall be revised as necessary to reflect current load expectations.
- The customer shall notify the Company of any material changes in operations that could impact the calculation of the customer's floor rate, e.g.
 - If the customer's operations change energy or demand usage by more than ten percent on a sustained basis for 6 months the customer shall notify the Company. The Company and the customer will then evaluate whether the changes in the Customer's energy and demand are expected to continue and whether such changes merit a reevaluation of the floor rate.
 - If the customer changes base rate schedules after the original evaluation of the floor rate, the floor rate and associated discount will be reevaluated.
- During the contract period the Company will review and adjust the customer's floor rate and discount, as needed, to account for changes, including but not limited to, rate designation, load forecasts, and applicable state and federal laws and regulations.
- All service rules and extension rules that apply to Schedule Cp-1, Cp-1A, Cp-1B, Cp-2, Cp-2A, or Cp-2B will apply to customer taking service under this rider.

11. Qualifying Economic Development Programs:

State of Wisconsin Programs

CAPITAL FINANCING PROGRAMS

Wisconsin Development Fund (WDF)
Rural Economic Development Program (RED3)
Minority Business Development Fund (MBD)
Technology Development Fund (TDF)
Technology Venture Fund Loan Program (TVF)
Technology Bridge Grant and Loan Program (TBG)
Technology Matching Grant and Loan Program (TMG)
Community Development Block Grant Program (CDBG-ED)
Industrial Revenue Bond Program (IRB)

EMPLOYEE TRAINING PROGRAMS

Customized Labor Training Program (CLT)
Best Employees' Skills Training (BEST)

COMMUNITY DEVELOPMENT PROGRAMS

Brownfield Grant Program (BF)
Community Development Block Grant Program – Blight Elimination &
Brownfield Redevelopment (CDBG-BEBR)



ECONOMIC DEVELOPMENT PROGRAM RIDER
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ELECTRIC

Community Development Block Grant Program – Public Facilities (CDBG-PF)
Community Based Economic Development Program (CBED)

TAX BENEFIT PROGRAMS

Agriculture Development Zone (ADZ)
Community Development Zone (CDZ)
Enterprise Development Zone (EDZ)
Development Opportunity Zone Program (DOZ)
Technology Zone Program (TZ)
Enterprise Zone Program ((EZ 10)

Local or County Programs

Financial assistance from a local Revolving Loan Fund
Establishment of or location in a Tax Increment Financing District
Direct loan from a unit of local government
Construction of public facilities – roads, sewer, water – to serve a project
Site acquisition and clearance
Building renovation assistance

Federal Programs

Loan Guarantees
Grants
Investment Tax Credits
Income Tax Credits tied to New Hiring
Low-Interest Loans

Other, subject to Commission Approval

12. The Company's Reporting Requirements

The Company shall notify the Commission when it adds or removes customers from the Rider.

By March 31, of each year the Company will file a report with the Commission providing the following information.

- Unemployment rates by county in the Company's service territory and the statewide unemployment rate, compared to a baseline period (years 2005, 2006, and 2007).
- The most recent three-year average industrial sales volume, compared to the baseline period.
- The number of customers enrolled in the Rider during the year.



ECONOMIC DEVELOPMENT PROGRAM RIDER
(Experimental)

ELECTRIC

- The number of customers that completed the Rider during the year and are taking service at non-discounted rates.
- The number of customers that dropped out of the program during the year.
- The total number of customers enrolled in the program, stratified according to the years in the program and the corresponding prorated level of discount.
- The incremental revenues that the Company received during the calendar year under the program.
- The incremental energy that customers in the program consumed during the calendar year.



ELECTRIC SCHEDULE NEMCCSF
NET ENERGY METERING SERVICE FOR CITY AND COUNTY OF SAN FRANCISCO MUNICIPAL LOAD SERVED BY HETCH HETCHY AT-SITE PHOTOVOLTAIC GENERATING FACILITIES

Sheet 1

APPLICABILITY: This rate schedule is applicable to photovoltaic electricity generating facilities owned by the City and County of San Francisco ("CCSF") and designated by the CCSF as "HHWP At-Site Solar Generation Facilities"¹ where all of the following conditions are met:

(N)

- 1) The CCSF has provided PG&E with written notice to designate the facility as an HHWP At-Site Solar Generation Facility;
- 2) The HHWP At-Site Solar Generation Facility utilizes a PG&E meter, or multiple PG&E meters, capable of separately measuring electricity flow in both directions;
- 3) The CCSF does not sell electricity delivered to the PG&E electric grid from the HHWP At-Site Solar Generation Facility to a third party;
- 4) The total peak generating capacity of all HHWP At-Site Solar Generation Facilities shall not exceed fifteen megawatts;
- 5) The HHWP At-Site Solar Generation Facility shall be located at a site to which electricity is delivered by PG&E as Municipal Load under the CCSF IA.;
- 6) The CCSF may terminate its election of service under this rate schedule upon providing Pacific Gas And Electric Company (PG&E) with a minimum of 60 days written notice.

Ownership and use of the "Environmental Attributes"¹ associated with all the electricity delivered to the PG&E electric grid by the HHWP At-Site Solar PV Generation Facility and purchased by PG&E shall be retained by the CCSF.

HHWP At-Site Solar Generation Facility interconnections in portions of San Francisco where PG&E has a network grid may be export limited. The CCSF is strongly encouraged to contact PG&E regarding any export limitations, before beginning any work on a HHWP At-Site PV Generating Facility that is expected to export under NEMCCSF.

TERRITORY: Municipal Facilities served under the CCSF IA.

RATES: Each HHWP At-Site Solar Generation Facility must be assigned, as determined by PG&E, an "Appropriate TOU Tariff"¹.

All credits for exports to the PG&E grid shall be valued at the generation component of the energy charge of the Appropriate TOU tariff assigned to the HHWP At-Site Solar Generation Facility by PG&E, unless the California Public Utilities Commission (CPUC) determines it is appropriate to increase the credit to reflect any additional value derived from the location or environmental attributes of the HHWP At-Site Solar Generation Facility.

Costs to administer this tariff will be funded through bundled customer rates.

Note 1 -- See Special Condition 4 -- DEFINITIONS

(Continued)

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ELECTRIC SCHEDULE NEMCCSF
NET ENERGY METERING SERVICE FOR CITY AND COUNTY OF SAN FRANCISCO MUNICIPAL LOAD SERVED BY HETCH HETCHY AT-SITE PHOTOVOLTAIC GENERATING FACILITIES

Sheet 2

BILLING:

PG&E shall assign the Appropriate TOU Tariff for each Account served by an HHWP At-Site Solar Generation Facility.

Any electricity exported to the PG&E grid by a HHWP At-Site Solar PV Generation Facility shall be valued in dollars at the generation component of the Energy Charge of the Appropriate TOU Tariff for each time-of-use period and applied monthly as a credit or offset against the invoice created pursuant to the Interconnection Agreement.

Monthly credit amounts are interim and subject to an accounting true-up. A separate true-up shall be performed annually for each site served under this rate schedule each March and also 1) upon the CCSF's election to terminate service under this rate schedule or 2) upon the termination, for any reason, of the CCSF IA or 3) for any individual Account, upon the termination of its FERC IA². The true-up shall accomplish the following:

- (1) If the total electricity delivered to the Account by PG&E since the previous true-up equals or exceeds the total electricity exported to the PG&E grid by the HHWP At-Site Solar Generation Facility, the CCSF is a net electricity consumer for that Account. For any HHWP At-Site Solar Generation Facility site where the CCSF is a net electricity consumer, there shall be no change to the monthly credits as a result of the true-up. However, if there is no invoiced obligation to be reduced, there is no applicable credit.
- (2) If the total electricity delivered to the Account by PG&E since the previous true-up is less than the total electricity exported to the PG&E grid by the designated HHWP At-Site Solar Generation Facility, the CCSF is a net electricity producer at that Account

For any HHWP At-Site Solar Generation Facility where the CCSF is a net electricity producer, the CCSF shall receive no credit or offset for the electricity exported to the PG&E grid in excess of the electricity delivered to the Account from the PG&E grid. PG&E shall use the last-in, first-out method to determine what electricity delivered to the PG&E grid from the Account will not earn a credit or offset.

If the CCSF IA terminates, the CCSF and PG&E shall develop an alternative mechanism to convey credits earned under this section in a manner that accomplishes the same result as that accomplished pursuant to the Interconnection Agreement.

Note 2 – See Special Condition 4. – DEFINITIONS

(Continued)

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Sheet 3

SPECIAL CONDITIONS:

1. **METERING EQUIPMENT:** The HHWP At-Site Solar Generation Facility shall utilize a PG&E meter, or multiple PG&E meters, capable of separately measuring electricity flow in both directions. All PG&E meters shall provide "time-of-use" measurement information. If the existing PG&E meter at the site of the designated HHWP At-Site Solar Generation Facility is not capable of providing time-of-use information or is not capable of separately measuring total flow of energy in both directions, the CCSF is responsible for all expenses involved in purchasing and installing a PG&E meter or PG&E meters that are both capable of providing time-of-use information and able to separately measure total electricity flow in both directions.

2. **INTERCONNECTION:** Prior to receiving approval for Parallel Operation, the CCSF must complete PG&E's interconnection review process including completing an interconnection application provided by PG&E, signing a Federal Energy Regulatory Commission (FERC) jurisdictional interconnection agreement and, if special facilities are needed to complete the interconnection signing a FERC jurisdictional special facilities agreement (SFA). The CCSF must meet all applicable safety and performance standards established by the National Electrical Code, the Institute of Electrical and Electronics Engineers, and accredited testing laboratories such as Underwriters Laboratories and, where applicable, the FERC rules regarding safety and reliability.

3. Nothing in this section shall waive or modify the rights of parties under the CCSF IA or the jurisdiction of the FERC over rates set forth in the CCSF IA.

4. **DEFINITIONS**
 - A. "Account" as defined in Electric Rule 1, *Definitions*.

 - B. "Appropriate TOU Tariff" means the Time-of-Use (TOU) tariff that would be applicable to the CCSF Account at the photovoltaic project site if the facility at the site were a PG&E bundled customer, as determined by PG&E.

 - C. "CCSF IA" means the 1987 Interconnection Agreement between PG&E and the CCSF or its successor agreement, as filed with and accepted by the Federal Energy Regulatory Commission (FERC), and as amended from time to time with FERC approval, which provides for rates for transmission, distribution, and sales of supplemental electricity to the CCSF.

 - D. "Environmental Attributes" are those associated with the HHWP At-Site Solar Generation Facilities and include, but are not limited to, the credits, benefits, emissions reductions, environmental air quality credits, and emissions reduction credits, offsets, and allowances, however entitled, resulting from the avoidance of the emission of any gas, chemical, or other substance attributable to the HHWP At-Site Solar Generation Facilities owned by the CCSF.

(Continued)

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Sheet 4

SPECIAL
 CONDITIONS:
 (Cont'd.)

4. DEFINITIONS (Cont'd.)

- A. "FERC IA" – the FERC jurisdictional interconnection agreement for the HHWP At-Site Solar Generation Facility between CCSF and PG&E.
- B. "HHWP At-Site Solar Generation Facility" means the eligible CCSF owned, photovoltaic (PV) electricity generation facility on the CCSF's side of a single PG&E service point (Account) designated by the CCSF to be served under rate schedule NEMCCSF.
- C. Municipal Load, which is load eligible under the CCSF IA for certain services from PG&E, has the same meaning as in the most recent definition included in the CCSF IA.
- D. Municipal Facility is where Municipal Load is located.

(N)

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