

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

In the Matter of the Application of Kansas City)
Power & Light Company for Authority to) **File No. ER-2018-0145**
Implement a General Rate Increase for Electric)
Service)

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for) **File No. ER-2018-0146**
Authority to Implement a General Rate Increase)
for Electric Service)

**KANSAS CITY POWER & LIGHT COMPANY’S AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY’S
LATE-FILED EXHIBIT ON PEAK/OFF-PEAK PRICING DIFFERENTIAL**

COME NOW Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, the “Company”) and state as follows:

1. During the question and answer session convened on October 3, 2018, Commissioner Rupp requested the filing of an exhibit setting forth the ratio of peak to off-peak energy charges proposed in the Company’s residential time of use rate.

- a. For KCP&L in the summer, the proposed energy charge for the peak period is \$0.33326¹/kWh and the proposed energy charge for the off-peak period is \$0.11109²/kWh. See **Exhibit A** attached hereto. The ratio of peak to off-peak is therefore 2.99:1 for KCP&L.
- b. For GMO in the summer, the proposed energy charge for the peak period is \$0.29024³/kWh and the proposed energy charge for the off-peak period is

¹ This was the level proposed originally by KCP&L which will be adjusted downward in the compliance tariff filing based upon the agreed-upon revenue requirement reduction.

² This was the level proposed originally by KCP&L which will be adjusted downward in the compliance tariff filing based upon the agreed-upon revenue requirement reduction.

³ This was the level proposed originally by GMO which will be adjusted downward in the compliance tariff filing based upon the agreed-upon revenue requirement reduction.

\$0.09675⁴/kWh. See **Exhibit B** attached hereto. The ratio of peak to off-peak is therefore 2.99:1 for GMO.

2. Commissioner Rupp also requested information concerning the amount of AMI meter costs included in rate base for KCP&L and GMO.

a. For KCP&L's Missouri operations, the net plant amount included in rate base for AMI meters is approximately \$29.7 million.

b. For GMO, the net plant amount included in rate base for AMI meters is approximately \$20.5 million.

3. By order dated October 4, 2018, the Commission directed any party filing a brief to “address what source documents support KCP&L witness Lutz’s testimony that applicants and customers with heat pumps pay less per kW than those without such pumps.” Attached hereto as **Exhibit C** and **Exhibit D** are tariff sheets for KCP&L and GMO, respectively, demonstrating that winter season per kWh energy charges are lower for space heating residential customers than for residential general use customers. The Company will address the topics raised by the Commission in its October 4 order in its brief.

⁴ This was the level proposed originally by GMO which will be adjusted downward in the compliance tariff filing based upon the agreed-upon revenue requirement reduction.

WHEREFORE, the Company offers this late-filed exhibit.

Respectfully submitted,

/s/ Robert J. Hack

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**Attorneys for Kansas City Power & Light
Company and KCP&L Greater Missouri
Operations Company**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties of record on this 5th day of October 2018.

/s/ Robert J. Hack

Robert J. Hack

KANSAS CITY POWER AND LIGHT COMPANY

P.S.C. MO. No. 7 First Revised Sheet No. 7
 Canceling P.S.C. MO. No. 7 Original Sheet No. 7

For Missouri Retail Service Area

Residential Time of Use Pilot
 Schedule RTOU

AVAILABILITY

Available to single metered Residential customers receiving AMI-metered secondary electric service to a single occupancy private residence or individually metered living units in multiple occupancy residential buildings.

Not available to Customers that own and operate generation connected in parallel with the Company's electric system, or that receive service under Net Metering tariff (Schedule NM). Not available for Temporary, Seasonal, Three phase Standby, Supplemental, Resale or single metered multi-occupancy Residential Service.

APPLICABILITY

This Pilot shall be available as an option to customers otherwise served under the Company's Residential Service (Schedule R) to encourage customers to shift consumption from higher cost time periods to lower-cost time periods.

This Pilot is limited to a maximum of one thousand (1,000) Residential customers, unless otherwise requested by the Company to be increased and such an increase in participation is approved by the Missouri Public Service Commission.

A Customer exiting the program, disconnected for non-payment, or on a pay agreement may not be allowed to participate in this pilot, at the Company's discretion.

Service shall be provided for a fixed term of not less than one (1) year and for such time thereafter until terminated by either party via (30) day written notice.

Participation in this tariff is contingent upon approval of this tariff/rate as a Missouri Energy Efficiency Investment Act (MEEIA) Program with all associated costs recoverable through the Demand Side Investment Mechanism Rider (Schedule DSIM).

RATE, RTOU1

A. Customer Charge (Per month)	\$15.17	
B. Energy Charge per Pricing Period (Per kWh)	Summer <u>Season</u>	Winter <u>Season</u>
Peak	\$0.33326	\$0.27337
Off-Peak	\$0.11109	\$0.10722
Super Off-Peak	\$0.05554	\$0.04624

Issued: January 30, 2018
 Issued by: Darrin R. Ives, Vice President

Effective: March 1, 2018
 1200 Main, Kansas City, MO 64105

KANSAS CITY POWER AND LIGHT COMPANY

P.S.C. MO. No. 7 Original Sheet No. 7A
Canceling P.S.C. MO. No. _____ Sheet No. _____
For Missouri Retail Service Area

Residential Time of Use Pilot
Schedule RTOU

PRICING PERIODS

Pricing periods are established in Central Standard Time year annually, and by season, for weekdays and weekends. The hours of the pricing period for each season are as follows:

On-Peak: 4pm-8pm
Off-Peak: 8pm-12am
Super Off-Peak: 12am-6am

MINIMUM

Minimum Monthly Bill:

- 1) Customer Charge; plus
- 2) Any additional charges for line extensions, if applicable.

SUMMER AND WINTER SEASONS

The Summer Season is four consecutive months, beginning and effective May 16 and ending September 15, inclusive. The Winter Season is eight consecutive months, beginning and effective September 16 and ending May 15. Customer bills for meter reading periods including one or more days in both seasons will reflect the number of days in each season.

DEMAND SIDE INVESTMENT MECHANISM RIDER

Subject to Schedule DSIM filed with the State Regulatory Commission.

FUEL ADJUSTMENT

Fuel Adjustment Clause, Schedule FAC, shall be applicable to all customer billings under this schedule.

TAX ADJUSTMENT

Tax Adjustment Schedule TA shall be applicable to all customer billings under this schedule.

REGULATIONS

Subject to Rules and Regulations filed with the State Regulatory Commission.

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KCP&L GREATER MISSOURI OPERATIONS COMPANY

P.S.C. MO. No. 1 Original Sheet No. 146.5
Canceling P.S.C. MO. No. _____ Sheet No. _____
For Missouri Retail Service Area

**RESIDENTIAL SERVICE – TIME OF USE PILOT
ELECTRIC**

AVAILABILITY

This Pilot is available to single metered Residential customers receiving individually AMI-metered secondary electric service to a single occupancy private residence or individually metered living units in multiple occupancy residential buildings.

This Pilot is not available to Customers that own and operate generation connected in parallel with the Company's electric system, or that receive service under the Net Metering Interconnection Application Agreement. This Pilot is not available for Temporary, Seasonal, Three-phase, Standby, Supplemental, Resale, or single metered multi-occupancy Residential Service.

APPLICABILITY

This Pilot shall be available as an option to customers otherwise served under the Company's Residential Service to encourage customers to shift consumption from higher cost time periods to lower-cost time periods.

This Pilot is limited to a maximum of one thousand (1,000) Residential customers, unless otherwise requested by the Company to be increased and such an increase in participation is approved by the Missouri Public Service Commission.

If a Customer exits the program, is disconnected for non-payment, or is on a pay agreement, this Customer may not be allowed to participate in this pilot, at the Company's discretion.

Service shall be provided for a fixed term of not less than one (1) year and for such time thereafter until terminated by either party via thirty (30) day written notice.

Participation in this tariff is contingent upon approval of this tariff/rate as a Missouri Energy Efficiency Investment Act (MEEIA) Program with all associated costs recoverable through the Demand Side Investment Mechanism Rider (DSIM).

RATE, MORT

A. Customer Charge (Per month)	\$14.50		
B. Energy Charge per Pricing Period (Per kWh)		Summer <u>Season</u>	Winter <u>Season</u>
Peak	\$0.29024		\$0.23051
Off-Peak	\$0.09675		\$0.09300
Super Off-Peak	\$0.04837		\$0.03909

Issued: January 30, 2018
Issued by: Darrin R. Ives, Vice President

Effective: March 1, 2018
1200 Main, Kansas City, MO 64105

KCP&L GREATER MISSOURI OPERATIONS COMPANY

P.S.C. MO. No. 1 Original Sheet No. 146.6
Canceling P.S.C. MO. No. _____ Sheet No. _____

For Missouri Retail Service Area

**RESIDENTIAL SERVICE – TIME OF USE PILOT
ELECTRIC**

PRICING PERIODS

Pricing periods are established in Central Standard Time annually, and by season, for weekdays and weekends. The hours of the pricing periods for each season are as follows:

On-Peak: 4pm-8pm
Off-Peak: 8pm-12am
Super Off-Peak: 12am-6am

MINIMUM MONTHLY BILL

The Minimum Monthly Bill shall be the Customer Charge plus any additional charges for line extensions, if applicable.

SUMMER AND WINTER SEASONS

For determination of Seasonal periods, the four (4) summer months shall be defined as the four (4) monthly billing periods of June through September. The eight (8) winter months shall be defined as the eight (8) monthly billing periods of October through May.

MEEIA TRUE-UP AND PRUDENCE REVIEW

See Company Rules and Regulations (Sheet No. R-63.01.2)

ADJUSTMENTS AND SURCHARGES

The rates hereunder are subject to adjustment as provided in the following schedules:

- Fuel Adjustment Clause (FAC)
- Renewable Energy Standard Rate Adjustment Mechanism Rider (RESRAM)
- Demand-Side Investment Mechanism Rider (DSIM)
- Tax and License Rider

REGULATIONS

Subject to Rules and Regulations filed with the State Regulatory Commission.

KANSAS CITY POWER AND LIGHT COMPANY

P.S.C. MO. No. 7 Ninth Revised Sheet No. 5A
 Canceling P.S.C. MO. No. 7 Eighth Revised Sheet No. 5A

For Missouri Retail Service Area

RESIDENTIAL SERVICE Schedule R

RATE

Single-phase kWh and three-phase kWh will be cumulated for billing under this schedule.

A. RESIDENTIAL GENERAL USE, 1RS1A, 1RSDA, 1RS1B

Customer Charge (Per Month)	\$12.62	
	<u>Summer Season</u>	<u>Winter Season</u>
Energy Charge (Per kWh)		
First 600 kWh per month	\$0.12893	\$0.12231
Next 400 kWh per month	\$0.14916	\$0.07396
Over 1000 kWh per month	\$0.14916	\$0.06561

B. RESIDENTIAL GENERAL USE AND SPACE HEAT - ONE METER, 1RS6A, 1RFEB

When the customer has electric space heating equipment for the residence and the equipment is of a size and design approved by the Company and not connected through a separately metered circuit, the kWh shall be billed as follows:

Customer Charge (Per Month)	\$12.62	
	<u>Summer Season</u>	<u>Winter Season</u>
Energy Charge (Per kWh)		
First 600 kWh per month	\$0.13806	\$0.09703
Next 400 kWh per month	\$0.13806	\$0.09703
Over 1000 kWh per month	\$0.13806	\$0.06098

FILED
 Missouri Public
 Service Commission
 ER-2016-0285; YE-2017-0235

Issued: May 9, 2017
 Issued by: Darrin R. Ives, Vice President

Effective: June 8, 2017
 1200 Main, Kansas City, MO 64015

KCP&L GREATER MISSOURI OPERATIONS COMPANY

P.S.C. MO. No. 1 Original Sheet No. 146.1
Canceling P.S.C. MO. No. _____ Sheet No. _____
For Missouri Retail Service Area

**RESIDENTIAL SERVICE
ELECTRIC**

- A. MONTHLY RATE FOR: GENERAL USE MORG⁽¹⁾, WITH NET METERING, MORN
- a. CUSTOMER CHARGE \$10.43
 - b. ENERGY CHARGE:

	<u>Summer Season</u>	<u>Winter Season</u>
First 600 kWh:	\$0.12050 per kWh	\$0.10625 per kWh
Next 400 kWh :	\$0.12050 per kWh	\$0.07800 per kWh
Over 1000 kWh:	\$0.12050 per kWh	\$0.07800 per kWh
- B. MONTHLY RATE FOR: SPACE HEATING – ONE METER MORH⁽¹⁾, WITH NET METERING, MORNH
- a. CUSTOMER CHARGE \$10.43
 - b. ENERGY CHARGE:

	<u>Summer Season</u>	<u>Winter Season</u>
First 600 kWh:	\$0.12050 per kWh	\$0.10625 per kWh
Next 400 kWh:	\$0.12050 per kWh	\$0.06035 per kWh
Over 1000 kWh:	\$0.12050 per kWh	\$0.04991 per kWh

⁽¹⁾ Heat and Water Separate Meter (MO922 now MORG or MORH) is frozen effective June 15, 1995.

February 22, 2017

Issued: November 8, 2016
Issued by: Darrin R. Ives, Vice President

FILED
Missouri Public Service Commission
ER-2016-0156; YE-2017-0068

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1200 Main, Kansas City, MO 64105