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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EM-2017-0226, et al.

SURREBUTTAL TESTIMONY

OF

WILLIAM J. KEMP

ON BEHALF OF

GREAT PLAINS ENERGY INCORPORATED KANSAS CITY POWER & LIGHT COMPANY KCP&L GREATER MISSOURI OPERATIONS COMPANY

Kansas City, Missouri March 2017

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WILLIAM J. KEMP

Case No. EM-2017-0226, et al.

Q: Are you the same William J. Kemp who submitted Direct Testimony in this
 proceeding?

3 A: Yes, I am.

4

1. INTRODUCTION AND PURPOSE

5 Q: What did you do to prepare your Surrebuttal Testimony?

A: I reviewed the testimony of witnesses in this proceeding who addressed directly Great
Plains Energy's ("GPE") estimates of efficiencies that would be produced from its
acquisition of Westar Energy, Inc. ("Westar") (the "Transaction"), i.e., Missouri Energy
Consumers Group ("MECG") witness Mike Gorman and City of Independence
("Independence") witness Joe Herz. After considering the logic and evidence presented
by these witnesses, I developed the surrebuttal points that are set forth below.

12 Q: What is the purpose of your Surrebuttal Testimony?

A: This testimony responds to the referenced intervenor witnesses. It is intended to
reinforce the basic message from my Direct Testimony, help focus on the most material
issues, and assist the Commissioners in making a well-informed decision in promoting
the public interest, including no detriment to Missouri customers in approving the
Transaction.

18 More specifically, this testimony responds to certain ill-founded assertions 19 contained in the testimony of witnesses Gorman and Herz. They each take issue with 20 elements of my Direct Testimony. I will demonstrate through my Surrebuttal Testimony

1		that their positions are factually incorrect, suffer from serious logical flaws, or advocate
2		bad public policy.
3		Finally, additional evidence will be provided on key points in response to witness
4		Gorman and witness Herz's testimony.
5		2. EXECUTIVE SUMMARY
6	Q.	Please summarize the conclusions of your Surrebuttal Testimony.
7	A.	My major conclusions are as follows:
8		• No witnesses have contradicted the fact the estimated total savings from the
9		Transaction are generally consistent with the middle of the range of what has been
10		achieved from similarly situated mergers. GPE's savings estimates are conservative
11		and reasonable, and GPE is committed to achieve them.
12		• The integration planning work since July 2016 has reinforced the reasonableness and
13		achievability of the total estimated efficiencies from the Transaction. The initial
14		savings estimates developed during the bid phase are reasonable and achievable.
15		They have been reviewed and validated by the integration planning teams, who have
16		also found opportunities for additional efficiencies.
17		• GPE's estimates of efficiencies from the Transaction in the Generation and
18		Supply Chain areas were not challenged by Mr. Gorman or Mr. Herz. It should
19		be noted that GPE achieved significantly more than the targeted Supply Chain
20		savings from the KCP&L-Aquila transaction.
21		 GPE's estimates of Shared Services savings from the merger are conservative and
22		robust. To argue that Shared Services savings are not core benefits from the

Transaction flies in the face of economic common sense, industry experience and
 regulatory precedent.

- GPE's estimated total savings in the Transmission and Distribution ("T&D") and
 Customer Service areas are not large, and should be very achievable. GPE is
 taking a very conservative approach to any such cost reductions, so that reliability
 and customer satisfaction are not negatively affected.
- GPE counted only operational and capital cost savings that were attributable to the
 Transaction, *i.e.*, they were directly created or enabled by the Transaction, and could
 not reasonably be realized in the normal course of business as separate companies.
 The Commission has accepted this standard in the past, notably in the KCP&L Aquila transaction.
- GPE has demonstrated that it can successfully execute and harvest substantial efficiency savings from merger transactions. Its achieved savings from the KCP&L-Aquila transaction significantly exceeded the initial estimates. On a comparative basis, the operations and maintenance ("O&M") costs per customer for GPE's operating utilities improved from 124 percent of the industry median in 2008 to 110 percent in 2015,¹ *i.e.*, in the seven years following the close of than transaction.

¹ After adjustments to exclude O&M costs that vary very widely across utilities due to structural factors largely beyond management control, such as generation divestiture, ISO/RTO costs, energy efficiency program mandates and pension plans.

1	Q.	Has the level of confidence by GPE's management around the reasonableness and
2		achievability of the overall savings changed since the time of the initial savings
3		analyses completed by GPE Management in conjunction with your team?
4	А.	Yes. Their level of confidence has grown higher due to the more detailed integration
5		planning work performed by GPE and Westar since July 2016. See the surrebuttal
6		testimony of Steven Busser for an overview of the status of the integration planning
7		work. The achievability of the initially estimated levels of total Transaction savings has
8		been confirmed, and specific plans are being readied for execution.
9		3. CORRECTIONS
10	Q.	Do you have any corrections that you wish to make to your Direct Testimony?
11	A.	Yes, I have one set of corrections that I would like to make. I do not believe these
12		corrections are material.
13		I would like to revise the Costs to Achieve by non-fuel operations and
14		maintenance ("NFOM") category for 2017 only, to make my Schedule WJK-3 consistent
15		with the numbers for costs to achieve that were used in the final GPE financial model run
16		for the bid. The total NFOM Costs to Achieve for 2017 increases by \$1.2 million:
17		• Generation increases from \$0.7 million to \$1.4 million.
18		• T&D and Customer Service increases from \$0.6 million to \$1.2 million.
19		• Shared Services decreases from \$5.5 million to \$5.4 million.
20		There are no changes to Costs to Achieve for 2018-2020.
21		The revised summary table of estimated savings, incorporating these changes, is
22		attached as Schedule WJK-3R.
23		

4. SAVINGS ESTIMATION APPROACH 1 2 **Q**. Do you have any general comments about Mr. Gorman's reliance upon testimony of 3 other witnesses in the merger approval proceeding before the Kansas Corporation 4 Commission ("KCC")? Yes. In pages, $30-32^2$ of his rebuttal testimony, where he develops his views on the 5 A. 6 savings estimation process used by GPE, Mr. Gorman cites and relies heavily on 7 testimony and evidence presented before the KCC by other witnesses in that proceeding (Docket No. 16-KCPE-593-ACQ). He freely quotes their conclusions and echoes their 8 9 concerns. 10 However, Mr. Gorman has not brought into evidence in the instant case before the 11 Missouri Public Service Commission ("MPSC" or "Commission") any of the data or 12 analyses that these other witnesses relied upon in formulating their concerns and 13 conclusions. As an expert in developing cost savings estimates attributable to merger 14 transactions, I could not form an expert opinion on the validity of Mr. Gorman's positions 15 on savings without such information. Mr. Gorman's conclusions on GPE's savings 16 estimates deserve no credence because they are based on testimony and evidence that is 17 not before this Commission, and are therefore unreliable.

 $^{^{2}}$ Note: All cites are to the March 23, 2017 Michael P. Gorman Rebuttal testimony filed in MPSC Docket No. EM-2017-0226 *et al.*, based upon representations of MECG counsel that this is the only Gorman Rebuttal that will be offered into evidence.

Q. Mr. Gorman (at page 7, lines 6-7) and Mr. Herz (page 11, lines 1-12 and page 13,
 lines 12-21) both attempt to characterize the estimates of savings from the proposed
 Transaction that GPE developed during the bid process as uncertain, lacking
 sufficient detail or speculative. Do you agree with these characterizations?

5 No. GPE developed its initial savings estimates in the context of an auction process. The A. 6 time and data available for the initial savings analysis were limited by the bid process 7 timeline, as they often are in transactions such as this one. GPE's team had to operate 8 within the same constraints as the other bidders. The process was not unusually 9 abbreviated from my experience in other transactions. As is typical for many major 10 decisions in the business world, GPE made its decisions around the bid using the best 11 data available at the time.

12 After the bid process ended and the legal limitations on information sharing were 13 lifted, information began to flow more freely between Westar and GPE. GPE and Westar 14 have been developing since July 2016 successively more detailed integration plans, with 15 quantified savings goals and executive accountability for achieving them. The leader of 16 GPE's Integration Project (to plan and execute the integration of the GPE and Westar), 17 Steve Busser, testifies that this substantial additional work has increased GPE's 18 confidence in the savings estimates from the bid process. He further testifies that the 19 total level of estimated savings increased during the course of the integration planning 20 work.

Q. Was the savings estimation team in the bid process charged with developing
 definitive, exhaustive estimates of savings?

A. No. Our goal was not exhaustive quantification, but rather analysis adequate to answer
the over-riding question: Are the reasonably achievable savings sufficient to meet the
targets for making a competitive bid while maintaining GPE's financial and operational
health and producing significant long-term benefits for customers and shareholders? We
were conducting a sufficiency test.

8 GPE fully expected the savings mix to shift, and likely expand, as it drilled down
9 into further detail in the integration planning process. And that indeed has been the case.

10 Q. Mr. Herz asserts that the efforts of GPE's savings estimation team appeared to be
biased or circular due to the savings targets that they were asked to assess (page 11,
lines 12-14). Do you agree?

A. No. As explained in the preceding Question and Answer, the team was not trying to come up with a definitive estimate. We were analyzing whether the reasonably achievable savings (singles and doubles, not home runs) were sufficient to make the deal work for the benefit of both customers and shareholders.

The guidance from GPE management to keep the estimates conservative, as well as the responsibility placed on GPE executives to achieve the savings, effectively prevented the team from pursuing overly aggressive savings estimates. The need to answer the sufficiency question in a parallel but opposing way encouraged the team not to get too conservative. The team had to find the right balance.

Assuring that the conservatively estimated savings are sufficient to generate benefits and preserve GPE's financial health is the same right balance for assessing

whether the Transaction is in the public interest. Any savings beyond that are "icing on
 the cake," since GPE is proposing to pass all savings through to customers as they are
 flowed through the normal ratemaking process.

4 Mr. Herz's concern about what is sometimes called "confirmation bias" is 5 misplaced. As I state in my direct testimony at page 9, line 17 through page 10, line 7, 6 Enovation provided the initial set of broad savings expectations to GPE in the analysis of 7 utility industry experience with merger savings that was delivered to GPE in March 2016, 8 before the start of the bid process and before Enovation was aware that GPE had opened 9 discussions with Westar. Enovation had no role in defining the minimum target savings, 10 and was not given any initial merger-related savings estimates, so the team's estimates 11 could hardly be subject to confirmation bias.

Q. Mr. Gorman (page 7, lines 7-10 and page 31, lines 6 through 9) proposes a standard
that would require GPE to show that the savings projections can only be achieved
through the Transaction, and cannot be achieved absent the Transaction. Is such a
standard consistent with Missouri Public Service Commission ("MPSC" or
"Commission") precedents on merger approvals?

A. No. First of all, Mr. Gorman appears to have fabricated a quote from my direct testimony. He states on page 31, line 8 that my direct testimony contains the phrase
"absent the proposed Transaction." It does not. Neither that phrase nor the word
"absent" appear anywhere in my testimony in this case.

Second, Mr. Gorman's logic equates to requiring a strict "but for" test, wherein only savings that could not be achieved in any way without the merger are allowed to be counted. This was not the standard used during the proceeding which resulted in MPSC

approval of GPE's acquisition of Aquila, Inc. in 2008. I know this personally because I
was a witness on the topic of transaction savings in that proceeding. The Commission
used the same standard in that case as the one I applied in my Direct Testimony in the
instant case.³

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Q. Why is a strict "but for" standard impractical to implement?

A. It is impractical because it invites parties to deny the reality of benefits from the merger
by creating unrealistic and unproven hypotheticals of how similar benefits could be
achieved without the merger.

For example, Boris Steffen⁴, who testified on behalf of Kansas City, Kansas 9 10 Board of Public Utilities ("BPU") in the KCC merger approval case, suggested a number 11 of ill-advised ideas on how GPE could help Westar achieve greater efficiencies without 12 merging. These include GPE renting out part of its new customer information system 13 ("CIS") to provide CIS services for Westar's customers (a recipe for information 14 technology ("IT") and legal disaster), outsourcing back office and support services (more 15 expensive and not as effective as merger consolidation), and selling its supply chain 16 advanced analytics capabilities to Westar (ignores violation of vendor contract 17 confidentiality and required IT capabilities at Westar).

18 Reducing GPE's estimated savings on account of such hypothetical alternative 19 paths to savings, as has been suggested by Mr. Gorman, would create an illusory standard 20 that is not grounded in reality. It is not realistic to require that GPE and Westar should 21 operate as though they have merged, when in fact they have not. If such a practice was

³ See MPSC Docket No. EM-2007-0374, Report and Order, p. 80, paragraphs 177-180 (July 1, 2008).

⁴ Mr. Gorman cites Mr. Steffen approvingly on page 32.

practical and effective, we would see numerous of examples of such "pretend mergers." But we do not.

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The end result of the standard supported by Mr. Gorman would be to deny that mergers can produce cost savings. In fact, when pressed on this point in hearing before the KCC, Mr. Steffen admitted that under his standard, none of the estimated savings from the GPE-Westar combination would be counted as merger-related: not the consolidation of management structures and corporate programs; not the consolidation of central shared services; not the increased bargaining power and economies of scale in the supply chain function; nothing.

10 Departing from MPSC precedents to apply such an artificial standard would 11 discourage transactions that will clearly produce significant efficiency benefits for 12 customers and the state. Regulation of utility mergers would become more complex and 13 less predictable, and economic growth would suffer.

14 Q. What standard did you apply for counting savings as merger-related?

A. GPE counted only operational and capital cost savings that were attributable to the
 Transaction, *i.e.*, they were directly created or enabled by the Transaction, and could not
 reasonably be realized in the normal course of business as separate companies.

18 The phrase "in the normal course of business as separate companies" could count 19 benefits as merger-related if they demonstrably can be achieved at significantly greater 20 speed or lower risk through the merger, even if those benefits may hypothetically be 21 possible to achieve as separate companies after normal business practices have been set 22 aside. Acceleration of cost savings by 3-5 years or more will reduce revenue

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requirements and produce rate benefits. Such savings are certainly not detrimental to the public interest.

Q. Is it true, as concluded by Mr. Gorman at page 32, lines 17-20 of his rebuttal
testimony that "it is at very best uncertain whether or not the savings are caused
only due to the merger or rather the savings could be achieved without the proposed
Transaction?"

A: Absolutely not. Mr. Gorman attempts to paint the whole range of estimated savings with
a broad brush of uncertainly about their relationship to the merger. In fact, the record
before this Commission is replete with examples of savings that could only be achieved
with the Transaction. These include the core (or "created") merger savings mentioned
above, around consolidation of management structures, corporate programs, central
shared services, etc. A merger is the fastest, most effective and often the only practical
way to access these savings.

For a more extended example, in the Supply Chain area:

- GPE's savings estimates include benefits from applying GPE's better
 practices in data analytics and contract management to Westar, and from
 extending the terms of the most favorable GPE or Westar contracts for similar
 services to the combined company.
- Westar does not have the internal data bases or IT capabilities to implement advanced analytics in Supply Chain, and has not succeeded in recent years in its attempts to implement such analytics. GPE's better practices in data analytics and contract management cannot be "sold" to Westar.

1		• Very substantial amounts of Supply Chain savings also depend on leveraging
2		the much larger size of the combined company to negotiating more favorable
3		pricing and terms on procurement
4		None of these benefits would be accessible in the near term without the merger.
5		5. SAVINGS ESTIMATE ISSUES
6	Q.	Mr. Gorman cites a concern raised by KCC Staff witness Ann Diggs on the
7		estimated vs. actual savings from the KCP&L-Aquila transaction. Could you please
8		clarify what was achieved?
9	A.	Yes. GPE's initial estimates of the savings from the potential KCP&L-Aquila
10		transaction were developed in February 2007. The level of information sharing and
11		savings analysis at that point in the merger discussions was roughly equivalent to that
12		during the bid process in the GPE-Westar discussions. Estimated non-fuel operations and
13		maintenance expense savings ("NFOM") in the first five years after close were \$264
14		million.
15		The estimated synergy savings finally filed with the MPSC in November 2007
16		were considerably higher. Projected NFOM savings for the first five years had risen 16
17		percent, to \$312 million. See my Schedule WJK-6, which is Schedule RTZ-6 from the
18		testimony of GPE witness Robert Zabors in MPSC Docket No. 07-KCPE-1064-ACQ.
19		In her recent testimony before the KCC, Ms. Diggs raised a question about why
20		the NFOM cost reductions achieved by three years after the KCP&L-Aquila transaction
21		$(9.3\% \text{ of total NFOM})^5$ were slightly smaller than the 10.1% that had been estimated in

⁵ See Exhibit WJK-5, page 2, and supporting workpapers.

the November 2007 surrebuttal testimony in the KCP&L-Aquila case.⁶ My response to
Ms. Diggs was that GPE had absorbed larger than expected costs in rebuilding Aquila's
customer service function. And the Great Recession had caused operational
complications and significantly increased costs such as uncollectible accounts, which are
booked as a NFOM expense item but are clearly not merger-related. But GPE still came
close to meeting its final synergy savings estimates, as reflected in changes in total
NFOM expenses.

At a more merger-specific level, the regulated operating synergy savings for the first five years after close of the Aquila transaction, as tracked and reported to the MPSC, came in well above the final estimates (\$367.5 million vs. \$312 million), and thus extended above the initial estimate of \$264 million from early 2007 by an even greater amount. Corporate savings outside of regulated operating savings added another large pool of realized savings.

14 It is clear from the record that the KCP&L-Aquila transaction achieved actual 15 savings that were substantially higher than initially estimated. GPE executed well, even 16 in trying economic circumstances.

Q. Mr. Herz discusses a concern on page 12, lines 6-14 of his rebuttal testimony that
GPE's "integration plans will be results driven," and that may result in pressure to
generate targeted savings that could adversely impact security and reliability. Do
you share his concerns?

A. No. While I certainly do hope and expect that the integration plans will be results drivenin the sense of achieving at least the estimated total savings, GPE has adopted a highly

⁶ See Exhibit WJK-3 in Kemp Supplemental Direct testimony in MPSC Docket No. EM-2007-0374

conservative approach to pursuing savings in the operational areas that affect security,
reliability and customer satisfaction. As explained above and on pages 19 and 24-25 of
my direct testimony, overly aggressive savings measures that would carry higher
execution risk were screened out, as were any significant reductions in resources for
T&D field work and customer service. GPE is pursuing efficiency improvements in
T&D and Customer Service only to the extent that they could be achieved with minimal
or no risk of negative service impacts on customers.

8 Q. Mr. Herz goes on to assert that GPE is pursuing estimated savings of nearly five 9 percent (5%) in Distribution O&M expense and capital expenditures. Is his concern 10 justified?

11 No. Mr. Herz appears to have pulled the five percent figure from my Schedule WJK-4, A. 12 which shows an estimated savings for Distribution O&M expense of 4.9% vs. a 2016 13 baseline. First, this figure did not address capital expenditure reductions. It was only for 14 O&M. Second, two-thirds of the estimated Distribution O&M savings by 2020 are an 15 allocated portion of savings from the Supply Chain function, as shown on that same 16 Reducing the cost of the conductor, poles, transformers, etc. through schedule. 17 procurement efficiencies will not have any negative impact on reliability, security or 18 customer services. The estimated reduction by 2020 in real O&M expense for the core 19 Distribution function (before allocated Supply Chain savings) is only 1.8 percent, and 20 almost all of that is from centralized engineering and planning, not Distribution field operations.⁷ 21

⁷ See Schedule WJK-7, which is an excerpt from KCP&L's response to Staff data request 230 in MPSC Docket No. ER-2014-0370.

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6. BENCHMARKING DATA IMPLICATIONS

Q. The final section of Mr. Gorman's rebuttal testimony on the topic of savings (pages
3 35-38) presents two sets of benchmarking data, making the argument that these
data show that GPE and Westar should not be allowed to combine. Do you agree
with his logic and conclusions?

A. No. First, Mr. Gorman again mischaracterizes my standard for counting cost reductions
as merger-related. That standard is stated in my direct testimony (page 18, lines 2-4) and
above in this surrebuttal testimony. It is the same basic standard that I used in my
testimony before this Commission in the KCP&L-Aquila merger case.

10 Second, the logical nexus between achieving specific merger-related savings and 11 rankings in a set of cost and rate benchmarking results is tenuous at best. The argument 12 that the latter determines the former is specious. It ignores actual merger management 13 performance (see above), which is a more directly relevant consideration. It also ignores 14 drivers of costs and rates that are not merger-related, but can greatly influence 15 benchmarking positions. I explain some of these drivers below, as they apply to KCP&L, 16 GMO, and Westar.

17 Third and most fundamentally, Mr. Gorman's logic and conclusions would make 18 for bad public policy. He would bar utilities that - for whatever reason - have higher cost 19 structures from pursuing major actions (e.g., M&A transactions) that are intended to 20 reduce their costs. Apparently only utilities whose cost benchmarks are low would be 21 allowed to pursue mergers or acquisitions, even if their reliability, customer satisfaction, 22 corporate citizenship and other performance metrics were very bad. It is difficult to tell 23 from Mr. Gorman's testimony what he recommends as the path forward for utilities with

1 higher cost metrics. It is also difficult to tell how a non-utility buyer would be able to 2 pass his test. There are better uses for benchmarking data. 3 0. Do GPE's merger savings estimates make the assumption that GPE and Westar are 4 "low cost providers," as asserted by Mr. Gorman on page 35, lines 14-15? 5 No. The baseline costs, against which the estimated savings were estimated, were the A. 6 O&M and capital expenditure budgets of GPE and Westar. There was no assumption 7 that either company was a low cost provider, or a high cost provider for that matter. 8 The goal was to identify reasonably achievable cost savings and improve cost 9 performance. 10 Is Mr. Gorman's characterization of KCP&L and KCPL Greater Missouri **O**. 11 **Operations ('GMO'') as "relatively high cost providers" fair and accurate?** 12 A. Not based on his analysis. Mr. Gorman's "comparison" of O&M costs (summarized in 13 MPG-2) is misleading. His conclusions, therefore, are erroneous and unreliable. 14 To illustrate these flaws, using solely Gorman's MPG-2, one clearly sees the 15 following examples: 16 Illustration 1. Consider the total range of NFOM costs presented in MPG-2. As • 17 summarized in Table 1 below, the NFOM per customer for the highest cost utility 18 (line 2) in any given year is 12.2 to 60.6 times (line 3) the low NFOM utility (line 1). 19 Simply stated, it implies that to consider Mr. Gorman's conclusion relevant, the 20 Commission must accept that some utilities operate at 1-2 orders for magnitude 21 higher costs, that these cost variations are largely due to management performance, 22 and the other Commissions are satisfied with this cost performance. Even by 23 applying a more conservative comparative view, say, comparing the #70 ranked

utility NFOM costs versus the #20 ranked utility in any given year (2012 -2015)
suggests that these (relatively) "high" NFOM cost utility are 1.9-2.0 times the unit
cost (line 6) times the cost of the (relatively) "low" NFOM cost systems. Again, to
accept Mr. Gorman's assertion, the Commission would need to accept that these
extreme comparisons are meaningful. Alternatively, the Commission could allow
that there is more to this topic (see below).

Table 1Ranges of NFOM per Customer

		Тс	tal NFOM			
Line		<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	Notes
1	Low	75	28	132	150	From MPG-1
2	High	1640	1696	1857	1824	From MPG-1
3	Multiple (H/L) (#2/#1)	21.9	60.6	14.1	12.2	Calculated Value
4	Rank #20	448	447	469	490	From MPG-1
5	Rank #70	829	815	918	915	From MPG-1
6	Multiple (H/L) (#5/#4)	1.9	1.8	2.0	1.9	Calculated Value

<u>Illustration 2</u>. Reviewing any one utility – say, Cleveland Electric, as an example –
 reveals that NFOM costs are not necessarily stable and often vary widely from year to
 year from a variety of factors (lines 7 and 8), from \$212 to \$364 per customer in
 2012-2015. Even within a utility, these are wide variances (again, in a very mature,
 stable business).

Table 2 NFOM per Customer for Comparable Utilities

		Тс	tal NFOM			
Line		<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	Notes
7	Cleveland Electric Illum Co.	289	212	310	364	From MPG-1
8	Y/Y Change of #7 (%)		-27%	46%	17%	Calculated Value
9	Dayton Power & Light	1092	1354	1610	1519	From MPG-1
10	Toledo Edison	533	448	598	634	From MPG-1
11	Multiple (Day/Tol) (#9/#10)	2.0	3.0	2.7	2.4	Calculated Value

1 Illustration 3. Reviewing two reasonably comparable systems will likewise often • 2 reveal enormous - and unexpected (to a layman) - variations in NFOM costs as 3 presented by Mr. Gorman. Consider, for example, Dayton P&L and Toledo Edison. Both are Ohio utilities (a common regulator), serving similar communities (similar 4 5 work force/labor similar topography, similar weather, similar rates. 6 economic/demographic markets, etc.). They are located about 100 miles apart. 7 Nevertheless, Dayton P&L has NFOM cost per customer (as presented by Gorman) 8 that are 2-3 times higher than Toledo Edison. See Table 2, line 11 above.

<u>Illustration 4</u>. Mr. Gorman totally relies on NFOM costs for comparison, although he
 does not define it. For example, are supply NFOM costs included in power
 production NFOM? Is purchased power expense in NFOM?

12 Q. What are the implications of these wide differences in reported NFOM expense?

A. Accepting Mr. Gorman's conclusion that, "GPE's existing utility subsidiaries are
relatively high cost utility providers rather than low cost providers" without definition,
qualification, explanation, or understanding of the local cost drivers is misleading at best
and suggests that these apparently very large NFOM cost differences are: 1) the result of
management action or carelessness, and 2) are perfectly acceptable to their common
Commissions and the diligent work of decades of public utility regulation. That is not
plausible.

Therefore, a useful comparative NFOM assessment must, at a minimum, consider and adjust for: 1) major structural differences among utility systems, 2) some of the most obvious, material, and discernable (through FERC accounts) historic regulatory choices that often drive variances in NFOM cost levels, and 3) workforce choices made in by

management and observed by the Commission over many decades. Mr. Gorman's
 assessment (MPG-2 and testimony) lacks this understanding and discernment.

3 Q. Did you conduct an analysis of the reported costs of utilities that are comparable to 4 GPE and Westar, to illustrate the impacts of these local cost drivers?

A. Yes. 178 U.S. electric utilities report FERC Form 1 data on a comparable basis and are
included in the publicly available data base of the SNL data service. SNL is the same
data service referenced by Mr. Gorman. Our comparative sample, or peer group,
included the 75 electric systems with greater than 300,000 customers and less than 1.5
million customers.

10 This comparative subset was designed to address the following issues around11 comparability:

- Experienced industry analysts recognize that very large U.S. utilities (say, 12 • 13 Consolidated Edison of New York, Pacific Gas and Electric, Southern California 14 Edison, etc.) often have very distinct system design, customer usage, and other 15 operating characteristics that are radically different from systems like GPE and 16 Westar. These differences significantly distort typical "per customer" or "per kWh" 17 comparative measures. For example, these large, densely-urban systems may have 18 millions of customers who have very low average usage (e.g. in multifamily housing) 19 and underground (rather than overhead), networked (rather than radial) systems that 20 have plant investment, operating cost, and reliability characteristics very different 21 from smaller, less urban systems.
- Relatively small systems (say, less than 300,000 customers) are also eliminated to
 avoid their often unusual characteristics that, likewise, distort comparative

assessments. Even a cursory review of Mr. Gorman's Exhibit MPG-2 quickly affirms
this view and the potential for misinterpretation. Mr. Gorman's lauded "low cost"
systems (e.g. Kingsport, Emera) may well not have achieved their low costs from
management or regulatory innovation but rather because they lack the responsibility
for (and/or the related costs) for major system elements (e.g. no production or
transmission system, separate accounts, etc.).

7 The 75 systems included in the comparative dataset that I analyzed are
8 sufficiently large and diverse to offer meaningful comparisons within a range of
9 reasonableness.

10 Q. What are some of the types of structural differences that can have major impacts on 11 reported NFOM expense?

First, regarding only the most obvious structural differences, utility systems vary widely in their level of purchased power vs. in-system generation. Thus, the appropriate comparison NFOM should be based solely on the Transmission, Distribution, Customer Accounting & Service ("Customer Service"), Sales, Administrative and General ("A&G") expenses. Moreover, delivery of off-system purchases requires transmission fees paid to other systems, which are recorded in FERC account 565.

In reviewing investor-owned electric utilities reporting their costs to FERC,
we note GPE's subsidiaries have relatively high expenses for net transmission fees
paid to others to satisfy power supply needs of customers. These NFOM costs add
approximately \$70 (vs. median) to \$90 (vs. low quartile) per customer for GPE's
systems, relative to the peer group for this account.

Figure 1

Transmission by Others Expense (#565) Per Customer



Similarly, we note that some utilities have relatively high expenses for miscellaneous transmission operations expense (FERC account 566). In Westar's case, these costs include the network transmission charges paid to the Southwest Power Pool ("SPP"). Such SPP-related NFOM costs add over \$300 per customer for Westar's systems, relative to the peer group median or first quartile costs for this account. This is a very substantial local cost driver.

Figure 2

Transmission Ops Misc. (#566) Per Customer



• Second, the scope and cost of Energy Efficiency and Demand Response (EE&DR) programs implemented at various utilities varies: a) widely among states, b) widely among utilities within states (i.e. a common regulator), c) significantly from year-to-year for the same utility, and d) in accounting treatment (i.e. the booking to FERC accounts).

8 Although accounting methods for these EE&DR programs vary widely among 9 utilities, most are presented in the FERC Customer Service and Customer Information 10 Expense accounts (various 900-series FERC accounts). In reviewing FERC-reporting 11 IOUs, we note GPE's GMO subsidiary has relatively high Customer Service and 12 Information expenses related to these EE&DR programs in recent years. These

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NFOM costs add approximately \$80 (vs. median) to \$105 (vs. low quartile) per customer relative to the industry for the total NFOM costs. As shown below:

Figure 3

Customer Service/Info Expense Per Customer



• Third, over the past two decades utilities have varied widely in their approach to employee and retiree pension and benefits programs. Specifically, some systems have transitioned employees to Defined Contribution plans, while others have maintained historic Defined Benefit plans to the maximum degree possible. Among those systems with Defined Benefit programs, various plan assumptions (discount rates, employee contributions, etc.) affect Pension and Benefit costs (FERC account 926). Often, more conservative systems have higher costs. These decisions have been made by management with the active participation and oversight of regulators

and other stakeholders. Consequently, Pension and Benefit costs (account 926) vary enormously among utility systems as illustrated below in Figure 3.

In reviewing FERC-reporting IOUs, we note GPE subsidiaries have relatively high expenses for Pension and Benefit costs. These NFOM costs add approximately \$110 (vs. median) to \$130 (vs. low quartile) per customer relative to the industry for the total NFOM costs.

Figure 4



Pension & Benefit Cost Per Customer (#926)

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Q. How do the operating utilities of GPE and Westar compare on costs per customer
 with their utility peers when adjustments are made for these major structural
 factors?

4 A. The three structural cost drivers discussed above demonstrate the perils of a total NFOM
5 analysis without definition, qualification, or consideration of (some) important and
6 material variances among systems.

7 Given the topics noted above, a more meaningful comparison of NFOM across 8 utilities including GPE and Westar should consider and adjust for the most obvious 9 Specifically, generation NFOM should be structural differences among utilities. 10 excluded, and adjustments should be made for the impact of net transmission fees paid to 11 others (FERC accounts 565 and 566), estimated costs of extensive EE&DR programs 12 (Customer Services/Information account group), and Pension and Benefit Costs. The 13 chart below presents the GPE utilities' NFOM costs versus the industry on a comparable 14 basis (i.e. these same costs have been removed from all data, and thus "normalized" from 15 reported values.)

16 This is not a full normalization. Other factors such as customer density can affect 17 NFOM cost levels per customer. Fewer customers per mile of distribution line increases 18 the cost per customer. Westar's systems have relatively low customer densities. For the 19 sake of simplicity, however, I have limited the adjustments for my normalized analysis to 20 the structural cost drivers discussed above.

Figure 5



As can be seen from Figure 5, when distortions from several localized cost drivers are removed, the NFOM costs per customer for GPE's operating utilities are close to the median of the 75-utility peer group. Westar's operating utilities are in the upper fourth quartile for this metric.

Figure 6 presents the same data as Figure 5, but in a relative form. It shows the
Delivery NFOM cost per customer as a percentage of the median for the peer group, after
excluding the FERC NFOM accounts that reflect the three structural cost drivers
discussed above.





3 Q. What insights do you draw from Figure 6, on the issue of whether the KCP&L4 Aquila merger allowed GPE to improve its relative cost performance?

A. GPE's operating utilities improved their Delivery NFOM cost per customer from 124
percent of the industry median (for the relevant peer group) in 2008, to 110 percent of the
industry median in 2015. The merger enabled GPE to harvest successfully a substantial
volume of efficiency savings, for the ultimate benefit of its customers.





13 rates for GPE versus regional firms. While these comparisons may be true on their face,

they do not enable any direct or meaningful assessment of GPE's management for
 precisely the same reasons noted above.

3 For example, Figure 7 below shows the Delivery NFOM cost per kWh, after 4 adjusting for the three major structural cost drivers noted above. This metric includes all 5 Transmission O&M, Distribution O&M, Customer Accounting/Service, Sales, and A&G 6 costs, with the exceptions of external transmission expense (FERC accounts 565-566), 7 DSM and energy efficiency program costs, and Pension & Benefits costs (FERC account 8 926). As can be seen in Figure 7, all of the operating utilities of GPE and Westar are in 9 the second or third quartile, *i.e.*, their cost performance is close to the industry average, 10 not high. KCP&L's cost per kWh comes very close to first quartile performance.

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Figure 7



Mr. Gorman's benchmarking analysis is seriously flawed, he draws the wrong
 conclusions about GPE and Westar's cost performance, and his policy advice is
 counterproductive. His recommendations should be rejected.

Q. Mr. Gorman raises concerns about GPE's A&G costs, citing evidence presented by MPSC Staff in KCP&L's last rate case. What are some of the factors that tend to increase KCP&L's A&G costs?

7 A. The discussion above points out the large impact of the Pension and Benefit costs (FERC
8 account 926). KCP&L also records rent expense, due to the downtown GPE
9 headquarters location, whereas certain peer utilities that own their headquarters would
10 reflect the asset on rate base and record depreciation expenses, thus creating an A&G cost
11 disparity among peer utilities.

12 Mr. Gorman certainly seems to pre-judge the results of the management audit to 13 which GPE has agreed. He states on page 38, lines 20-22 that merely the need for 14 (actually the agreement to conduct) a management audit should be enough to disqualify 15 GPE from completing its Transaction with Westar. In fact, the report filed by Staff in 16 Case No. EO-2016-0124 specifically acknowledged that "KCPL A&G expenses are high 17 in numerous comparisons, driven primarily by Pension Expense. The Company has 18 taken actions to better control pension expense and while the benefit of those actions will 19 not be realized in the near term, they are anticipated to eventually lower A&G costs."

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Once again, Mr. Gorman's policy advice is to penalize GPE for trying to reduce its A&G costs (and other costs) through the proposed Transaction.

1		7. CONCLUSIONS
2	Q:	Could you please summarize the major conclusions of this Surrebuttal Testimony?
3	А.	My major conclusions are as follows:
4		• GPE stands by its estimates of total savings from the Transaction. The initial savings
5		estimates developed during the bid phase have been reviewed and validated by the
6		work of the integration planning teams since July 2016, with some shifts among
7		categories as more detailed analyses were completed. The integration teams have
8		also found opportunities for additional efficiencies, which is to be expected as they
9		deepen their understanding. GPE management is more, not less, confident that total
10		estimated efficiencies from the Transaction will be achieved.
11		- GPE's estimates of efficiencies from the Transaction in the Generation and
12		Supply Chain areas were not challenged. It should be noted that GPE
13		achieved Supply Chain savings from the KCP&L-Aquila transaction that were
14		substantially higher than initially estimated, using an approach similar to that
15		assumed in the GPE-Westar savings analysis.
16		- GPE's estimates of Shared Services savings from the merger are conservative
17		and robust. Scale economies in Shared Services are a core element of merger
18		savings. To argue that Shared Services savings are not benefits from the
19		Transaction flies in the face of economic common sense, industry experience
20		and regulatory precedent.
21		- GPE's estimated savings in the T&D and Customer Service areas are not
22		large, because GPE is taking a very conservative approach to any such cost

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reductions, so that reliability and customer satisfaction are not negatively affected.

- Messrs. Gorman and Herz argue for very narrow, artificial criteria for counting
 customer benefits. The "but for" test may sound plausible, but it would be very
 difficult to apply, would require acceptance of unproven hypotheticals on alternative
 paths to savings, and can easily lead toward an unproductive defense of the status
 quo.
- GPE counted only operational and capital cost savings that were attributable to the
 Transaction, *i.e.*, they were directly created or enabled by the Transaction, and could
 not reasonably be realized in the normal course of business as separate companies.
- No witnesses have contradicted the fact the estimated total savings from the
 Transaction are generally consistent with the middle of the range of what has been
 achieved from similarly situated mergers. This squares with the broad, real world
 experience of other utility mergers, and with GPE's track record in the Aquila
 acquisition. GPE's savings estimates are conservative and reasonable, and GPE is
 committed to achieve them.
- GPE has demonstrated that it can successfully execute and harvest substantial efficiency savings from merger transactions. Its achieved savings from the KCP&L-Aquila transaction significantly exceeded the initial estimates. On a comparative basis, the Delivery O&M costs per customer for GPE's operating utilities improved from 124 percent of the industry median in 2008 to 110 percent in 2015, *i.e.*, in the seven years following the close of that transaction.

1 Q: Does that conclude your surrebuttal testimony?

2 A: Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

IN THE MATTER OF THE APPLICATION OF GREAT PLAINS ENERGY INCORPORATED FOR APPROVAL OF ITS ACQUISITION OF WESTAR ENERGY, INC.

Docket No. EM-2017-0226

AFFIDAVIT OF WILLIAM J. KEMP

STATE OF MISSOURI

) ss

William J. Kemp, being first duly sworn on his oath, states:

1. My name is William J. Kemp. I am a Founder and Senior Managing Director at Enovation Partners, LLC. My company's headquarters are in Chicago, Illinois.

2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Great Plains Energy Incorporated, Kansas City Power & Light Company, and KCP&L Greater Missouri Operations Company consisting of <u>thirty-two</u> (32) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

William J. Kemp

Subscribed and sworn before me this 27 day of March, 2017.

Micac D. C. Notary Public

My commission expires: Fub. 4 2019

NICOLE A. WEHRY
Notary Public - Notary Seal
State of Missouri
Commissioned for Jackson County
My Commission Expires: February 04, 2019
Commission Number: 14391200

SCHEDULE WJK-3R

ESTIMATED TRANSACTION SAVINGS

(based on analyses performed in support of GPE's bid)

\$million		Gross Savings				Costs to Achieve							Net Savings		
		2017 (1)	2018	2019	2020	2017 (1)	2018	2019	2020		2017 (1)	2018	2019	2020	2021+(3)
NFOM Expense															
	Generation	3	6	61	79	1		28	9		1	6	33	70	80
	T&D / CS	2	5	5	5	1					1	5	5	5	5
	Shared Services	10	23	24	24	5	2	2	1		5	21	22	23	25
	Supply Chain	12	22	66	66	8	2	2	2		5	20	64	64	65
	Total NFOM	28	55	155	174	16	3	31	12		12	52	124	162	176
Capital (2)		3	11	25	36	-	-	-	-		3	11	25	36	
Total		30	66	180	210	16	3	31	12		15	63	149	199	176

(1) Assumed Jul-Dec 2017
(2) Revenue requirement impact of capital expenditure reduction
(3) Annual savings after 2020 were not projected for GPE's bid, but minimal additional costs to achieve would be expected, and gross annual NFOM savings would be expected to increase at roughly the rate of inflation. Capital-related savings would decline after 2020 and have not been quantified.
Source: GPE savings estimates

Schedule RTZ-6: Summary of Synergies* *Originally submitted in MPSC Docket No. EM-2007-0374 with Supplemental Direct Testimony of Robert Zabors

Five Year Cumulative Synergies (\$mm)



Note:

- Emissions are not in current synergy total as Aquila is taking steps to capture emissions credit savings prior to deal close
- Synergy numbers are based on Aquila's actual 2006 costs
- Aquila states that corporate costs have now been reduced to a level that would imply \$221 million in corporate savings rather than \$302 million if 2007 was used as a basis instead of 2006

KCP&L-AQUILA SYNERGY SAVINGS Based on Actuals July 8, 2008 to June 30, 2013

Note Carbon Carbon <th>Sum of AMO</th> <th>UNI</th> <th>2001 NAME</th> <th></th> <th>YEAR</th> <th></th> <th></th> <th></th> <th></th> <th>2012</th> <th>0. 17.1</th>	Sum of AMO	UNI	2001 NAME		YEAR					2012	0. 17.1
OD OD OD OD OD <th>CATEGORY</th> <td>FUNCTIONAL</td> <td>PROJ NAME</td> <td>SYNERGY PROJ</td> <td>2008</td> <td>2009</td> <td>2010</td> <td>2011</td> <td>2012</td> <td>2013</td> <td>Grand Total</td>	CATEGORY	FUNCTIONAL	PROJ NAME	SYNERGY PROJ	2008	2009	2010	2011	2012	2013	Grand Total
Image: Part of the second se	Corp	Capital	20 W 91H HQ	FAC551	951,468	1,902,936	3,526,044	3,526,044	3,526,044	1,763,022	15,195,558
Image: 1 Add P (2) (100) (100) (100) (100) (100) Normality Normality (100) (100) (100) (100) (100) Normality (100)			Nebraska Facilities	FAC554	24,008	72,024	72,024	72,024	72,024	36,012	348,116
Part Not Data Number of Parkage			Sale of Blue Springs	FAC553		(3,948)	(15,792)	(15,792)	(15,792)	(7,896)	(59,220)
Image: state		Gain on Sale	20 W 9TH HQ	FAC551		(195,000)	(== ===)				(195,000)
Image: Provide state stat			Liberty Service Center Consol	FAC552			(73,779)				(73,779)
No. 1 Disc. Proc. Pr			Nebraska Facilities	FAC554					(2,909,716)		(2,909,716)
No.4 Section Dec. Disc. Disc. <thdisc.< th=""> <thdisc.< th=""> Disc.</thdisc.<></thdisc.<>			Sale of Blue Springs	FAC553		0					0
Point Build Process Point Dial Process Point Dial Process Point Dial Process Dial Proce	-		Sale of Platte City	FAC550	1,200,000						1,200,000
Product Science Science Participation Paritestetempone Participatintetetempone <th></th> <td>NFOM</td> <td>20 W 9TH HQ</td> <td>FAC551</td> <td>732,060</td> <td>1,509,513</td> <td>1,556,309</td> <td>1,604,554</td> <td>1,654,295</td> <td>852,789</td> <td>7,909,520</td>		NFOM	20 W 9TH HQ	FAC551	732,060	1,509,513	1,556,309	1,604,554	1,654,295	852,789	7,909,520
Product Product <t< td=""><th></th><td></td><td>Aquila BOD Fees & Stock Plan</td><td>GEN906</td><td>164,905</td><td>340,034</td><td>350,575</td><td>361,443</td><td>372,648</td><td>192,100</td><td>1,781,706</td></t<>			Aquila BOD Fees & Stock Plan	GEN906	164,905	340,034	350,575	361,443	372,648	192,100	1,781,706
Profest function Prime Prim< Prime Prime			ELT Meals & Travel	HR105	106,057	218,689	225,469	232,458	239,665	123,547	1,145,885
Process ProcestProcess Procest Process Process Process Process Process Process			Employee Headcount Reduction	HR100	10,818,882	22,308,534	23,000,098	23,713,101	24,448,207	12,603,051	116,891,873
Product nome Priority			Liberty Service Center Consol	FAC552		(10,000)	0				(10,000)
Part Interaction of Section 2012 1412			Nebraska Facilities	FAC554	17,784	55,006	14,178				86,968
Revent Encland Display Display <thdisplay< th=""> <thdisplay< th=""> <thdi< td=""><th></th><td></td><td>Redundant Spend-Central Services</td><td>SCP250.2</td><td>81,632</td><td>163,002</td><td>173,544</td><td>178,924</td><td>184,470</td><td>95,094</td><td>876,666</td></thdi<></thdisplay<></thdisplay<>			Redundant Spend-Central Services	SCP250.2	81,632	163,002	173,544	178,924	184,470	95,094	876,666
Part Part Part Part Part Part Part Part			Redundant Spend-Engineering	SCP250.3	282,940	583,422	601,508	620,155	639,380	329,600	3,057,006
Product port oncome member 0.7000 0.711 0.700 0.800 0.700 0.800 0.700 0.800 0.700			Redundant Spend-Environmental	SCP250.4	96,174	198,212	204,459	210,797	217,331	112,034	1,039,007
Report Employee Partial Partial <t< td=""><th></th><td></td><td>Redundant Spend-Finance - Banking</td><td>SCP250.6</td><td>37,113</td><td>76,526</td><td>78,899</td><td>81,345</td><td>83,866</td><td>43,233</td><td>400,982</td></t<>			Redundant Spend-Finance - Banking	SCP250.6	37,113	76,526	78,899	81,345	83,866	43,233	400,982
Period Enclose topol Sentinguement CO200.1 664.66 97.200 767.890 <th767.890< th=""> <th767.890< th=""> 767.890<</th767.890<></th767.890<>			Redundant Spend-Finance - Services	SCP250.7	1,165,561	2,651,166	3,005,212	2,116,354	443,745	723,351	10,105,390
Package Package Virpage Virpage <t< td=""><th></th><td></td><td>Redundant Spend-Gen Management</td><td>SCP250.9</td><td>464.695</td><td>958.201</td><td>987,906</td><td>1.018.531</td><td>1.050.105</td><td>541.329</td><td>5.020.767</td></t<>			Redundant Spend-Gen Management	SCP250.9	464.695	958.201	987,906	1.018.531	1.050.105	541.329	5.020.767
Product Product <t< td=""><th></th><td></td><td>Redundant Spend-HB & Temp Labor</td><td>SCP250.1</td><td>1 080 796</td><td>2 313 707</td><td>2 391 324</td><td>2 465 317</td><td>2 541 870</td><td>1 310 341</td><td>12 103 355</td></t<>			Redundant Spend-HB & Temp Labor	SCP250.1	1 080 796	2 313 707	2 391 324	2 465 317	2 541 870	1 310 341	12 103 355
Interaction (scale large) (2070)			Redundant Spend-Insurance	SCP250.8	2,888,975	5 957 067	6 141 736	6 332 130	6 528 426	3 365 404	31 213 738
Part Here Part Hole Part Hole <t< td=""><th></th><td></td><td>Redundant Spend-Insurance</td><td>SCP250.12</td><td>2,868,373</td><td>7 235 802</td><td>7 21/ 855</td><td>7 784 583</td><td>8 023 550</td><td>4 137 354</td><td>37 260 547</td></t<>			Redundant Spend-Insurance	SCP250.12	2,868,373	7 235 802	7 21/ 855	7 784 583	8 023 550	4 137 354	37 260 547
Part Product Specchart Name 2029/14 2027/27 2000/14 2029/28 2029/27 2000/14 2029/28 2000/14 200			Redundant Spend-Legal	SCP250.12	102 267	202 505	204 447	1,704,505	410 291	4,137,334	2 001 205
Part P Part P<			Redundant Spend-Office Supplies	SCP250.10	102,207	362,360	2 902 662	2 0 2 7 8 7 0	419,201	210,140	2,001,393
Participant Signal Si			Redundant Spend-Other Misc	SCP250.13	12,738,970	3,695,214	5,805,002	5,927,870	4,049,034	2,087,580	30,302,936
Image: Provide and the second secon			Redundant Spend-Safety	SCP250.11	241,777	509,301	526,551	542,874	559,703	288,527	2,668,732
Part Line Control Contro Control Control <			Redundant Spend-Security	SCP250.5	164,963	340,154	349,803	361,570	372,779	192,168	1,781,436
Biologic Construction Classify Your Classify Classify <th></th> <td></td> <td>Sale of Blue Springs</td> <td>FAC553</td> <td></td> <td></td> <td>(15,000)</td> <td>(10,628)</td> <td>(10,960)</td> <td>(5,650)</td> <td>(42,238)</td>			Sale of Blue Springs	FAC553			(15,000)	(10,628)	(10,960)	(5,650)	(42,238)
Uncl And Data Trans Store PDDS Class 1 Class 2			Six Sigma Prog Office Elim	GEN907	34,902	71,967	74,198	76,499	78,870	40,658	377,094
Other Import paral Ta belaction (00) (10) <th< td=""><th>-</th><td></td><td>Non-ELT Meals & Travel</td><td>HR106</td><td></td><td>425,476</td><td>438,666</td><td>452,265</td><td>466,285</td><td>240,370</td><td>2,023,062</td></th<>	-		Non-ELT Meals & Travel	HR106		425,476	438,666	452,265	466,285	240,370	2,023,062
Interestionary Description Image 2 Attach 2 Atta		Other	Employer Payroll Tax Reduction	HR104	797,352	1,638,244	1,695,108	1,747,657	1,801,834	928,845	8,609,040
Internet			Interest Savings	FIN907	8,194,191	17,162,867	17,746,200	15,250,685	7,296,790		65,650,733
One Table Interest Solution Program Page 100 2491/200 2491/200 2491/200 241/200 <th< th=""><th></th><th></th><th>LOC Fees</th><th>FIN908</th><th>3,618,615</th><th>7,441,068</th><th>6,876,533</th><th>6,348,284</th><th>7,256,330</th><th>3,658,237</th><th>35,199,066</th></th<>			LOC Fees	FIN908	3,618,615	7,441,068	6,876,533	6,348,284	7,256,330	3,658,237	35,199,066
Geng Teal 48,990.00 710 21.97 10.299.00 60.001.30 10.002.80 10.272.201 19.10.400 Replice Uptil 20.07 10.052.00 20.001 10.052.00 20.001 10.052.00 10.0			Interest Savings - Power Tech - Eliminate Program	FIN909			334,322	681,417	775,223	404,977	2,195,939
Preprint Capital 210 911101 (ACS)1 (L0863) 222/16 4006305 4008305 (L0863) 122/261 See of laws control control PACS31 2280 221.00 100.0500 77.007 77.007 77.007 77.007 77.007 77.007 77.007 77.001 77.	Corp Total				48,950,489	78,001,774	81,679,059	80,087,134	70,165,888	34,272,223	393,156,567
Prior Bisso Bisso <th< td=""><th>Regulated</th><td>Capital</td><td>20 W 9TH HQ</td><td>FAC551</td><td>1,098,828</td><td>2,827,236</td><td>4,086,396</td><td>4,086,396</td><td>4,086,396</td><td>2,043,198</td><td>18,228,450</td></th<>	Regulated	Capital	20 W 9TH HQ	FAC551	1,098,828	2,827,236	4,086,396	4,086,396	4,086,396	2,043,198	18,228,450
Likefs across Contra Consta 165/52 2.726 7.714 116.88 116.88 21.148 79.00			Fleet Reductions	DIS350			83,669	83,669	83,669	41,835	292,842
Start Print Start Print Topics <			Liberty Service Center Consol	FAC552	2,296	57,164	116,388	116,388	116,388	58,194	466,818
See of them Corp. 56/520 76.500 75.500 77.500			Sale of Blue Springs	FAC553		39,199	79.692	79,692	79,692	39,846	318.121
Store Light Numberson SCO211 7.288 7.249 7.240 7.240 7.240 7.241 7.242 7.242 7.241 7.242 7.242 7.242 7.242 7.242 7.242 7.242 7.243 7.216 7.226 7.226 7.226 7.226 7.226 7.226 7.226 7.226 7.226 7.226 7.226 7.226 7.226 7.226			Sale of Platte City	FAC550	6.824	38.816	75,504	75.504	75.504	37,752	309,904
Thream & Substitution 190001 27.232 80.118 81.408 82.81 18.002 197.232 First Continent Callboy 71.531 1.11.500 1.21.500 1.21.500 1.21.500 1.20.500 <td< td=""><th></th><td></td><td>Street Light Maintenance</td><td>SCP251</td><td>7 889</td><td>23 292</td><td>22 647</td><td></td><td></td><td></td><td>53 828</td></td<>			Street Light Maintenance	SCP251	7 889	23 292	22 647				53 828
Fort Contract Col (Stepp) 11160 312231 1292844 271201 3207.000 3207.000 MP Mutcest Trauminum Aveta1 1.114300 1.214400 1.214300 1.214400 1.214400 1.214400 1.21440 1.214400 1.214400 1.214400 1.214400 1.214400 1.214400 1.214400 1.214400 1.214400 1.214400 1.214400 1.214400 1.214400 1.214400 1.214400 1.214400			Transm & Subst Labor	TRN100	7,005	27 332	30 116	31 048	32 013	16 502	137 011
No. Construction Supply 1/1630 1/1630 1/1630 1/1630 2/1630 NP Outcom Transmission PMC41 3.1.4.4.4.1 1.0.1.1.1.8 1.0.0.1.1.8 1.0.0.0.1.1.1.8 1.0.0.0.1.1.8	-	Fuel	Continental Coal (Siblev)	PI T450		515 251	1 959 984	571 910	52,015	10,502	3 047 145
Horsen Transmism PVM451 1114560 20021340 21024404 3003121 3003021 200301 3003021 3003021 200301 200301 3003021 200301 3003021 200301 3003021 200301 3003021 200301 3003021 200301 3003021 3003021 200301 3003021 3003021 200301 3003021 3003021 200301 300302111111111111111111		i uci	Crossroads Gas Supply	DI T/151		1 214 500	1 214 500	571,510			2 429 000
Decision of field content E1152 6.22.244 1.158.24 1.158.24 1.158.24 1.158.24 1.158.24 1.158.24 1.158.24 1.158.24 1.158.24 1.158.24 1.158.24 1.158.24 1.158.24 1.158.24 1.158.25 1.158.2			SPD Notwork Transmission	DW/D4E1		2 214,500	7,027,040	0 174 442	10 621 229	2 000 042	2,423,000
Viroli Dial total function (11/32) 12/23/9 <th12 23="" 9<="" th=""> 12/23/9 12/23/9</th12>			SPP Network Transmission	PWR451	-	3,314,960	7,037,940	8,174,443	10,031,328	3,900,942	33,059,013
Involu Involu Involut	-	NEONA		PL1452	027.000	052,204	1,398,200	1,293,214	1 071 007	0001545	3,343,738
Image: Construct Process Proces		NFOM	20 W 91H HQ	FAC551	827,998	1,325,888	1,471,719	1,814,826	1,871,087	964,545	8,276,063
 Additional Scientification Contact Co			A/P Audit	SCP903	252,///	6,255	504.007	553.040	caa 050	262.222	259,032
			Aged Write-Offs Second Placement	CUS900			594,207	557,918	632,958	360,328	2,145,411
 Ause Recovery & Reclamation Cold Exam Cold Exam			Aquila BOD Fees & Stock Plan	GEN906	199,930	412,255	425,035	438,211	451,796	232,901	2,160,127
			Asset Recovery & Reclamation	SCP200	513,965	1,177,881	1,812,171	341,565	1,058,885	(829,439)	4,075,028
			Capacitors	SCP902	11,208	17,638	31,666	34,060	15,162	8,069	117,803
etc			Civil Engineering	PLT300		36,225	27,216	7,371	0	0	70,812
 Concingent Labor Corporate Conf. Guid Congreate Conf. Guid Congreate Conf. Guid Congreate Conf. Guid Statu Bit Mash & Travel H103 Distance Program Screen Distance Program<!--</td--><th></th><td></td><td>CMF Additional Fabrication</td><td>PLT301</td><td>373,840</td><td>278,403</td><td>591,548</td><td>403,722</td><td>473,806</td><td>302,810</td><td>2,424,129</td>			CMF Additional Fabrication	PLT301	373,840	278,403	591,548	403,722	473,806	302,810	2,424,129
k Compare: Credit Card EV Decision 200,000 200,000 104,888			Contingent Labor	SCP904	173,463	871,276	808,602	594,772	758,532	428,734	3,635,379
k = k + k + k + k + k + k +			Corporate Credt Card	SCP303		200,000	13,892	104,888	111,159	108,852	538,791
k = k = k = k = k = k = k = k = k = k =			ELT Meals & Travel	HR105	89,449	184,443	190,161	196,056	202,134	104,200	966,443
k Finding 1,774,643 3,859,00 4,01,033 2,07,00 19,773,033 Energy Columnar Program SCP06			Empl. Benefits Reduction	HR103	4,315,726	9,997,045	9,876,135	12,083,450	12,327,665	6,428,650	55,028,671
Image: Commit Program SC00 Parts SC00			Employee Headcount Reduction	HR100	1,774,641	3,659,309	3,772,747	3,889,702	4,010,283	2,067,301	19,173,983
Image: Probability Image:			Energy Optimizer Program	SCP906			85,902	21,090	0	0	106,992
IF Incustome Systems (Stark) 11904 14.511 84.121 126.530 152.702 81.200 67.1.43 IF-Ceeking Scients (Amice Entreth) 11905 3.844 119 0 0 0.805 IF-Creating Scients (Amice Entreth) 11903 222.272 1.078.714 0.805.87 396.626 1.139.128 687.203 587.204 587.204 587.204 587.204 587.204 587.204 587.204 587.205 586.265 799.305.97 110.505 956.66 146.355 799.356 346.45.70 110.555 956.67 146.356 799.3569 799.			Fleet Reductions	DIS350	344,572	2,325,276	2,353,455	597,999	332,559	1,155,636	7,109,497
			IT-Customer Systems (Stark)	IT904	14,511	84,121	126,530	152,970	157,712	81,300	617,143
Image: Construction Problem: Grant (Juni) 17901 222,275 1,078,714 2.068,750 398,200 1,133,128 587,220 5,687,327 Image: Construction-Probability 17906 1,3550 398,214 1,153,355 597,18 6,681,308 Image: Construction-Phase 1 57201 1,212,647 1,121,248 1,55,535 556,75 5,646,575 Line Construction-Phase 1 57201 566,150			IT-Desktop & Client Services (Bartlett)	IT905		3,844	119	0	0	0	3,963
Image: Product of the system (brief) 17903 223,340 2,383,44 81,385 1,472,172 1,543,585 725,718 6,811,080 In-Heal Intergy System (brief) 17902 172,230 1,093,707 1,212,477 1,155,535 595,678 5,644,557 Line Construction-Phase 1 5CP301 564,150 564,150 564,150 564,150 Line Locates 5CP301 185,201 1,43,661 1,507,201 1,525,831 5,64,137 846,657 7,043,206 Maragement Upfift HR102 (40,000) (82,480 185,201 1,525,831 5,564,337 5,64,375 5,588,252 1,652,831 1,652,831 1,623,861 1,62,203 1,62,283 1,62,280 1,62,801 1,62,281 1,62,281 1,62,801 1,62,303 1,62,303 1,62,303 1,62,303 1,62,303 1,62,303 1,62,303 1,62,304 1,62,321 1,72,558 3,58,422 1,92,572 4,75,558 3,58,423 1,72,578 3,58,41 9,33,521 47,126 4,34,127 1,43,424 4,45,671 1,76,56 </td <th></th> <td></td> <td>IT-Enterprise Systems (Lynn)</td> <td>IT901</td> <td>222,275</td> <td>1,078,714</td> <td>2,063,750</td> <td>396,260</td> <td>1,139,128</td> <td>587,220</td> <td>5,487,347</td>			IT-Enterprise Systems (Lynn)	IT901	222,275	1,078,714	2,063,750	396,260	1,139,128	587,220	5,487,347
In F.eel Time Systems (Debold) 1796 13.950 33.92,14 45.803 139.301 14.950 74.418 816.04 IT-WAN Services (Bean) 1702 127.2360 1.099.700 1.210.70 127.2147 1.155.553 595.678 554.4557 Line Construction-Phase 1 SCP901 125.688 245.07 26.4657 308.147 135.590 445.527 308.447 135.558 554.150 Materials, HO Supply SCP002 375.904 77.1517 745.565 944.508 74.5558 435.832 OATI webTrader Software PW1902 0 222.560 282.560 146.320 1.023.86 Power Matering GMO Subcriptions PW1902 0 222.560 282.560 146.280 1.023.86 Redundant Spend-Spinetrenial SCP202 140.27 80.078 88.619 94.719 93.70 1.42.857 Redundant Spend-Spinetrenial SCP202 140.827 83.614 91.361 47.056 445.27 Redundant Spend-Spinetrenial SCP202 140.827 83.			IT-Infrastructure/Architect(Anctil)	IT903	253,150	2,639,846	81,395	1,497,172	1,543,585	795,718	6,810,866
In WAN Services (Bear) 11902 1172.350 1.099.200 1.212.447 1.355.33 955.678 5.44.505 Line Construction-Phase 2 SCP802 2265.685 242,507 264,557 308,147 135.503 7.963.205 Line Locates SCP801 145.3461 1.577.210 1.575.33 1.564.137 846.657 7.943.206 Maargement Uplift H8102 (40.000) (62.480) (65.599) (68.522) (90.588) (46.504) (43.252) Nebrade Software PWI800 2.0 2.25.60 225.60 225.60 225.60 225.60 145.280 (43.242) Power Marketing GMO Subscriptions PWI800 2.87.248 898.64 93.61.4 4.73.05 Redundant Spend-Empineering SCP250.2 40.429 80.728 886.641 93.61.4 4.73.05 Redundant Spend-Empineering SCP250.4 1.24.748 87.548 2.31.31 2.34.84 2.37.742 1.32.866 1.12.23.16 Redundant Spend-Simornental SCP250.1 1.14.057 25.13.62 <th></th> <td></td> <td>IT-Real Time Systems (Diebold)</td> <td>IT906</td> <td>13.950</td> <td>398.214</td> <td>45.803</td> <td>139.301</td> <td>144.360</td> <td>74.418</td> <td>816.046</td>			IT-Real Time Systems (Diebold)	IT906	13.950	398.214	45.803	139.301	144.360	74.418	816.046
 Line Construction-Phase 1 SCP301 SSC430 Line Locates SCP301 Line Locates Line Locates			IT-WAN Services (Bean)	IT902	172,350	1,099,700	1,210,470	1,212,847	1,155,535	595,678	5,446,579
k k Line Construction-Phase 2 SCP902 255.685 245.207 264.657 303.147 135.690 12.10.386 Management Uplift HR102 (40.000) 182.489) 165.2991 163.212 15.25.831 15.645.417 464.697 704.3306 Matrials HD Supply SCP202 27.994.4890 185.2591 163.25.891 158.2521 159.958 348.4509 145.858 134.86.458 134.96.458 134.96.458 134.96.458 134.96.458 134.96.458 134.96.458 134.96.458 143.95.951 143.95.951 143.95.951 143.95.951 143.95.951 143.95.951 143.95.951 143.95.951 143.359 133.956 132.3591 133.956 132.3591 133.956 132.3591 143.4581 143.9561 122.32.131 134.861 122.32.131 134.864 133.850 143.957 114.557 114.557 114.557 114.557 114.557 114.557 114.557 114.557 114.557 114.557 114.557 114.557 114.557 114.557 114.557 114.557			Line Construction-Phase 1	SCP301	564,150	, ,			, ,		564.150
k k Line Locates SCP901 195,210 1,43461 1,507,210 1,528,381 1,564,137 846,657 7,7043,200 Marcrials HD Supply SCP202 379,904 771,917 745,965 944,508 745,908 1,358,252 Nebrazia Fallites FAC554 404,431 833,990 771,917 745,965 944,508 745,908 1,358,252 OATI webTrader Software PWF902 0 292,560 292,560 126,270 146,280 1,023,960 Power Marketing GMO Subscriptions PWF902 404,49 839,949 886,614 93,361 470,966 434,378 Redundart Spend-Ennicening SCP250.2 404,29 82,171 255,701 473,378 Redundart Spend-Finance - Services SCP250.5 142,478 93,305 39,104 95,991 49,483 483,808 Redundart Spend-Finance - Services SCP250.7 871,591 205,437 2,682,491 2,675,13 1,660,137,27 1,074,840 1,597,161 1,755,751 1,757,501 2,757,501			Line Construction-Phase 2	SCP302		256.685	245.207	264.657	308.147	135.690	1.210.386
kek Management uplift i+R102 140,000) 192,490) 195,290) 199,290) 199,290) 199,290) 199,290) 199,290) 199,290) 199,290) 199,290) 199,290) 199,290) 199,290) 199,290) 199,290) 199,2500 292,500 292,500 292,500 292,500 292,500 292,500 292,500 292,500 292,500 292,500 292,500 292,500 292,500 292,500 292,500 292,500 292,500 292,500 292,500 192,500 193,600 193,600 193,600 193,600 193,600 193,600 193,600 193,600 193,800 193,100 193,600 193,800 193,900 193,920 193,920 193,920 193,920 193,920 193,920 193,920 193,920 193,920 193,920 193,920 193,920 193,920 194,93,930 194,93,930 194,93,930 194,933,900 193,920 194,943,930 194,933,900 194,943,930 194,933,900 194,943,930 194,933,900 194,950,131 194,961,13			Line Locates	SCP901	185,910	1,413,461	1.507.210	1.525.831	1.564.137	846.657	7.043.206
Materials. HD Supply SCP202 Dots 279:394 771:917 78.956 944.508 745.958 3.358.237 Nebrask Facilities FACS54 40.4431 833.965 585.788 886.641 913.921 471.126 4.366.643 CATI webTrader Software PWF902 0 292.560 292.560 292.560 292.560 143.636 423.135 Redundant Spend-Central Services SCP250.2 40.429 85.724 298.9720 473.986 4123.135 Redundant Spend-frionmental SCP250.3 114.057 223.185 242.476 249.993 257.742 132.866 1232.318 Redundant Spend-frione-Services SCP250.7 871.454 2.34.66 23.134 2.368.73 24.788 116.570 12.460.144 Redundant Spend-friance-Services SCP250.1 445.21 555.04 24.171.709 364.20 24.81.33 24.83.94 24.93.93 25.91.24 42.65 550.927 Redundant Spend-friance SCP250.1 44.521 555.46 24.11.95.316 61.64.66 <th></th> <td></td> <td>Management Uplift</td> <td>HR102</td> <td>(40.000)</td> <td>(82,480)</td> <td>(85,599)</td> <td>(88,252)</td> <td>(90,988)</td> <td>(46,904)</td> <td>(434,224)</td>			Management Uplift	HR102	(40.000)	(82,480)	(85,599)	(88,252)	(90,988)	(46,904)	(434,224)
Netrista Facilities FACS54 404,431 833,936 895,783 886,441 913,921 471,116 43,965,402 CATI webTrader Schware PWR900 876,900 849,894 958,721 472,156 4123,595 Redundant Spend-Engineering SCP250.2 40,429 80,728 85,949 88,614 91,861 47,056 443,179 Redundant Spend-Engineering SCP250.3 114,057 233,185 242,476 429,939 257,421 122,266 122,246 Redundant Spend-Engineering SCP250.6 10,800 22,454 90,305 93,104 95,991 49,483 445,800 Redundant Spend-Environmental SCP250.6 10,800 22,454 23,341 2,4587 12,661 122,515 Redundant Spend-Finance - Sanking SCP250.1 817,1709 355,962 10,164,070 1,048,34 540,264 49,90,31 12,661 4,290,301 12,661 4,290,31 13,66,710 2,87,84 14,903,11 12,661 12,675 12,661 12,675 12,661 12,			Materials HD Supply	SCP202	(,,	379 904	771 917	745 965	944 508	745 958	3 588 252
OAT: webTracer: PMR002 Disc. Disc. <thdisc.< th=""> Disc. <thdisc.< th=""></thdisc.<></thdisc.<>			Nebraska Facilities	FAC554	404.431	833,936	859,788	886.441	913,921	471.126	4.369.643
Power Markening GMO Subscriptions PMV800 Ref. 376,000 849,894 958,721 959,741 948,734 958,721 958,721 959,741 948,834 955,951 949,843 4458,70 742 132,866 1,735,774 Redundant Spend-Finance - Services SC7250.7 871,549 2,582,699 2,064,347 2,898,340 2,27,733 1,426,370 1,2460,444 Redundant Spend-Finance - Services SC7250.1 445,521 959,950 985,962 1,016,470 1,048,034 5,042,247 429,302,217,257 Redundant Spend-Finance - Services SC7250.1 456,702 260,342 268,741 1,959,716 1,074,840 1,159,716 1,075,911 3,141,44 24,840			OATI webTrader Software	PWR902		0	292,560	292,560	292,560	146,280	1.023.960
Redundant Spend-Central Services SCP230.2 40,429 80,728 85,349 88,614 91,361 47,096 44,242,35 Redundant Spend-Engineering SCP230.3 114,057 235,185 242,476 249,993 257,742 112,266 1,422,319 Redundant Spend-Engineering SCP230.4 42,478 87,546 90,05 93,104 95,991 49,843 458,009 Redundant Spend-Engineering SCP230.6 10,800 22,436 23,311 23,848 24,587 12,667 112,557 Redundant Spend-Gen Management SCP250.1 344,521 93,9306 98,922 10,670 1,948,903 499,930 4,299,952 Redundant Spend-Mark Regal SCP250.1 445,621 953,960 985,921 10,67,910,430,43 500,204 490,913 1,391,205 140,304 119,271,81 1,391,316 465,403 276,741 283,320 147,039 147,931 1,394,913 140,931 1,394,913 140,931 140,931 1,394,913 440,419 223,779 2,074,482 146,444,9			Power Marketing GMO Subscriptions	PWR900	t	876.900	849,894	958.721	958.720	479,360	4.123.595
Redundant Spend-Engineering SCP250.3 114,057 235,185 242,476 249,993 257,742 132,866 1,232,313 Redundant Spend-Environmental SCP250.4 42,478 87,546 90,305 93,104 95,991 49,483 458,906 Redundant Spend-Finance - Services SCP250.7 871,549 2,582,699 2,054,347 2,898,840 2,227,388 1,405,370 12,640,144 Redundant Spend-Finance - Services SCP250.7 871,549 2,582,699 2,054,347 2,898,840 2,927,888 1,405,370 12,640,144 Redundant Spend-Imace - Services SCP250.1 445,521 953,860 985,962 1,016,470 1,048,034 540,264 499,0312 Redundant Spend-Maragement SCP250.11 426,772 1,077,861 1,197,216 1,193,316 616,366 5,559,927 Redundant Spend-Graph Mits SCP250.11 43,046 90,675 39,747 96,633 99,649 51,369 1,455,139 Redundant Spend-Graph SCP250.5 192,099 396,101 421,044 4			Redundant Spend-Central Services	SCP250.2	40 429	80 728	85 949	88 614	91 361	47.096	434 178
Redundant Spend-Environmental SCP250.4 42,478 87,246 93,05 93,104 35,591 44,483 458,900 Redundant Spend-Finance - Banking SCP250.6 10,880 22,436 23,131 23,848 24,587 117,557 Redundant Spend-Finance - Services SCP250.7 871,549 22,582,699 20,634,47 2,898,340 22,727,881 1,405,570 12,640,144 Redundant Spend-Finance - Services SCP250.1 445,621 933,960 985,562 1,016,470 1,048,034 540,644 4299,032 Redundant Spend-Finance - Services SCP250.1 426,779 1,077,961 1,077,4801 1,579,716 1,366,66 555,0927 Redundant Spend-Security SCP250.1 426,702 1,077,481 1,048,493 434,101 223,779 2,074,482 Redundant Spend-Security SCP250.5 192,099 396,109 37,426 34,890 80,851 28,32 447,798 1,055,57 Redundant Spend-Security SCP250.5 192,099 396,109 37,446 421,048 434,101 </td <th> </th> <td></td> <td>Redundant Spend-Engineering</td> <td>SCP250 3</td> <td>114 057</td> <td>235 185</td> <td>242 476</td> <td>249 993</td> <td>257 742</td> <td>132 866</td> <td>1.232 310</td>			Redundant Spend-Engineering	SCP250 3	114 057	235 185	242 476	249 993	257 742	132 866	1.232 310
Redundant Spend-Finance - Barking SCP250.6 10,880 22,131 23,848 24,567 117,557 Redundant Spend-Finance - Services SCP250.7 871,549 2,582,699 2,054,347 2,898,340 2,827,838 1,405,370 12,640,144 Redundant Spend-Gen Management SCP250.7 871,549 2,582,699 2,054,347 2,898,340 2,827,838 1,405,370 12,640,144 Redundant Spend-Hance - Scr250.1 445,621 953,960 398,552 1,016,470 1,048,034 540,764 4,990,317 Redundant Spend-Hort Mix SCP250.11 43,046 90,676 93,477 96,653 99,649 51,369 475,138 Redundant Spend-Security SCP250.1 43,046 90,676 93,477 96,653 99,649 51,369 475,138 Redundant Spend-Security SCP250.5 122,062 443,163 444,101 22,379 2,074,428 Sale of Blue Springs FAC553 101,375 122,520 133,154 68,641 575,527 Sale of Blue Springs FAC553 <			Redundant Spend-Environmental	SCP250 4	47 479	87 546	90 305	93 104	95 991	49 482	458 908
Redundant Spend -finance : Services SCP250.1 871,549 2,522,522,532 2,232,533 1,405,370 12,540,144 Redundant Spend-Gen Management SCP250.9 394,278 813,001 838,205 864,189 890,979 459,300 4,259,953 Redundant Spend-Hinsurance SCP250.1 445,621 4,933,12 1,048,034 540,264 4,990,312 Redundant Spend-Hinsurance SCP250.8 1,371,709 3,658,723 6,222,829 6,811,972 6,706,315 3,405,710 28,177,257 Redundant Spend-Other Misc SCP250.11 43,046 90,676 93,747 96,653 99,649 51,369 475,139 Redundant Spend-Security SCP250.11 43,046 90,676 93,747 96,653 99,649 51,369 475,139 Redundant Spend-Security SCP250.11 43,046 90,676 93,747 96,653 99,649 51,369 475,139 Sale of Platte City FAC553 101,375 125,267 113,3154 68,641 557,587 Sale of Platte City FAC5			Redundant Spend-Einance - Banking	SCP250.6	10.880	22 436	23 131	23 848	24 587	12 675	117 557
Redundart Spend - Gen Management SCP250:9 394,278 2,305,05 2,005,05 <t< td=""><th></th><td></td><td>Redundant Spend-Finance - Services</td><td>SCP250.7</td><td>871 549</td><td>2 582 699</td><td>2 054 347</td><td>2 898 340</td><td>2 827 838</td><td>1 405 370</td><td>12 640 144</td></t<>			Redundant Spend-Finance - Services	SCP250.7	871 549	2 582 699	2 054 347	2 898 340	2 827 838	1 405 370	12 640 144
Redundant Spend-effik & Temp Labor SCP203 349,278 333,00 349,278 333,00 349,278 333,00 349,279 343,00 349,279 343,00 349,278 333,00 349,278 343,00 349,278 343,00 349,278 343,00 349,278 343,00 349,278 343,00 349,278 343,00 349,278 343,00 349,278 343,00 349,278 343,00 343,00 349,278 343,00 343,00 343,04			Redundant Spend-Finance - Services	SCP250.7	204 279	2,382,033	2,034,347	2,858,540	2,827,838	450 200	4 250 052
Redundant Spend-Insurance SD220.1 443,021 355,900 350,902 1,010,070 1,046,034 340,2070 2,920,312 Redundant Spend-Insurance SD2250.12 442,027 6,021,922 6,811,972,677 2,803,312 1,921,912 5,706,031 340,207 6,741 285,320 147,033 1,304,615 Redundant Spend-Insurance SCP250.13 660,702 260,349 268,402 276,741 285,320 147,033 1,304,615 Redundant Spend-Insurance SCP250.11 43,046 90,676 93,747 96,653 99,649 51,369 475,139 Relay Dept. Consolidation TRN900 212,062 481,663 44,901 223,775 2,074,482 Sale of Blue Springs FACS53 101,375 125,67 129,150 133,154 68,641 557,594 Sale of Blue Springs FACS53 46,920 145,122 149,621 154,259 159,418 486,213 345,215 345,215 Subget Diffice Elim GEN907 47,060 1,715,000 1,277,000			Redundant Spend-Gen Management	SCD2E0.1	334,278	052.060	095 062	1 016 470	1 049 024	433,300 E40.264	4,233,332
Redundant Speint-Insurance SCF230.8 1,571,703 5,056,723 6,071,930 6,041,13,971 1,19,716 1,19,72 6,109,316 6,16,366 5,550,927 Redundant Spend-Geard SCF250.12 426,771 1,074,840 1,159,716 1,193,316 616,366 5,550,927 Redundant Spend-Security SCF250.11 43,046 90,676 93,747 96,653 99,649 51,369 477,148 Redundant Spend-Security SCF250.5 192,099 396,109 407,346 421,048 434,101 223,779 2,074,482 State of Plate Springs FACS53 101,375 1125,267 129,150 133,154 66,8641 557,587 Sale of Plate City FACS50 46,920 145,122 149,621 1154,259 159,041 81,986 736,948 Street light Maintenance SCF251 2,639 110,100 100,128 19,962 10,368 434,521 Supply Staffing PLT06 1,715,000 1,272,002 124,840 1,149,414 1,149,414 1,149,414			Redundant Spend-Incurance	SCP250.1	445,021	355,900	6 222 820	6 811 073	6,706,034	340,204	4,550,512
Redundant Spend-Other Misc SC220.12 420,727 1,07,780 1,07,440 1,139,718 1,131,718 1,131,718 1,131,718 1,131,718 1,131,718 1,131,718 1,131,711,718 1,131,718 1,131,718 1,131,718 1,131,718 1,131,718 1,131,718,718,718 1,131,718 1			Redundant Spend-Insulance	SCP250.8	1,371,703	3,036,723	1 074 840	1 150 710	1 105 216	5,405,710	20,177,237
Redundant Spend-Order Misc. SLP250.13 60,702 200,749 206,740 270,741 225,520 147,085 14,718 14,718 14,718 14,718 14,718 14,718 14,718 14,718 14,718 14,718			Redundant Spend-Legal	SCP250.12	420,727	1,077,961	1,074,840	1,159,710	1,195,310	010,300	5,550,927
Redundant Spend-Sarety SCP250.1 43,046 30,676 93,747 39,643 93,649 51,359 4475,139 Relay Dept. Consolidation TRN900 212,062 48,163 34,890 80,851 28,825 400,791 Sale of Blue Springs FAC550 101,375 125,267 129,150 133,154 66,641 557,579 Sale of Blue Springs FAC550 46,920 145,122 149,621 154,259 159,041 81,968 736,948 Six Sigma Prog Office Ellm GEN907 47,493 97,930 100,055 104,095 107,322 55,325 513,130 Street Light Maintenance SCP251 2,633 111,018 100,100 100,128 19,962 10,368 2482,000 Transm & subst Labor TRN100 13,500 162,555 274,404 323,044 257,028 124,284 1,154,815 Union Uplift HR101 (1,009,902) 3,079,072 (2,948,288) (2,555,75 2,689,011 20,342,486 Wood Poles Dis200			Redundant Spend-Other Misc	SCP250.13	66,702	260,349	208,420	276,741	285,320	147,083	1,304,615
Regundant Spend-security SLP250.5 192,099 396,109 407,346 421,048 434,101 223,779 2,074,345 Relay Dett. Consolidation TRN900 212,062 48,163 34,490 80,851 28,255 404,791 Sale of Blue Springs FAC553 101,375 125,267 129,150 133,154 68,641 557,587 Sale of Platte City FAC550 46,920 145,122 149,621 154,259 159,041 81,986 736,948 Six Sigma Prog Office Elim GEN907 47,493 97,930 100,965 104,095 107,322 55,325 513,130 Street Light Maintenance SCP251 2,639 1,11,018 101,100 100,0128 19,962 10,388 345,215 Union Uplift HR100 13,500 162,555 274,404 323,044 257,028 124,284 1,154,815 Union Uplift HR106 1,340,987 3,361,78 5,968,315 7,5458 91,098 55,51 4,48,801 5,659,041 144,914 <			Redundant Spend-Safety	SCP250.11	43,046	90,676	93,747	96,653	99,649	51,369	475,139
Image: Product Consolitation TRN900 212,062 48,163 34,890 80,851 28,825 404,758 Sale of Blue Springs FAC550 101,375 125,267 129,150 133,154 68,64 573,587 Sale of Platte City FAC550 46,920 145,122 149,621 154,259 159,041 81,986 573,597 Street Light Maintenance SCP251 2,639 111,018 100,0128 19,962 100,383 29,422 50,328 343,230 Supply Staffing PLT106 1,715,000 1,127,000 100,128 19,962 103,838 (14,942,000) Trans & Subst Labor TRN100 13,500 162,555 274,404 323,044 257,028 124,284 1,154,815 Union Uplift HR101 (1,009,902) (3,079,072) (2,948,288) (2,708,038) (1,356,351 406,339 Freight & Shipping SCP300 0 120,415 62,837 75,458 91,098 56,531 406,339 Freight & Shipping SCP304			Redundant Spend-Security	SCP250.5	192,099	396,109	407,346	421,048	434,101	223,779	2,074,482
Sale of Blue Springs FACS53 101,375 125,267 129,150 131,154 68,641 557,587 Sale of Plute City FACS50 46,920 145,122 149,621 154,259 159,041 81,986 736,948 Six Sigma Prog Office Elim GEN907 47,493 97,930 100,965 104,095 107,322 55,325 513,948 Supply Staffing PLT106 1,715,000 1,27,000 2,842,010 1,368 323,044 257,028 124,284 1,154,809 Union Uplift HR101 (1,009,902) (3,079,072) (2,948,288) (2,708,038) (1,355,186) (11,100,486 Wood Poles DIS200 0 120,415 62,837 75,458 91,098 56,531 406,333 Freight & Shipping SCP907 7,065 50,299 75,853 87,651 77,372 28,201 326,441 Non-ELT Meals & Travel HR106 1,349,987 1,341,244 1,241,921 1,481,047 244,361 56,559,041 Sarbanes-Oxley Control Ration			Relay Dept. Consolidation	TRN900		212,062	48,163	34,890	80,851	28,825	404,791
Sale of Platte City FACS50 46,920 145,122 149,621 154,259 159,041 81,986 736,948 Six Sigma Prog Office Elim GEN907 47,493 97,930 100,965 104,095 107,322 55,325 51,3130 Street Light Maintenance SCP251 2,639 111,018 101,100 100,128 19,962 10,368 345,215 Supply Staffing PLT106 1,715,000 1,127,000 2,242,844 11,54,815 (1,04,986 (1,15,816) (1,15,816) (1,15,816) (1,15,816) (1,15,816) (1,104,886 (1,2948,288) (2,708,038) (1,355,816) (1,24,284 (1,24,284 (1,24,284 149,632) (2,708,038) (1,355,816) (1,104,886 (1,104,886 (1,104,886 (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,886) (1,104,	I		Sale of Blue Springs	FAC553	 	101,375	125,267	129,150	133,154	68,641	557,587
Image: Six Sigma Prog Office Elim GEN907 47,493 97,930 100,965 104,095 107,322 55,325 513,130 Street Light Maintenance SCP251 2,639 111,018 101,100 100,128 19,962 103,88 345,215 Supply Staffing PLT106 1,715,000 1,127,000 2,842,000 Transm & Subst Labor TRN100 13,500 162,555 274,404 323,044 257,028 124,284 1,154,815 Union Uplift HR101 (1,009,902) (3,079,072) (2,948,288) (2,708,038) (1,355,186) (11,100,482,486 Wood Poles Di5200 0 120,415 62,837 75,458 91,988 56,531 406,339 Freight & Shipping SCP907 7,065 50,299 75,853 87,651 77,372 28,201 326,441 Non-ELT Meals & Travel HR106 1,349,987 1,341,284 1,241,921 1,481,047 244,805 56,531 51,57,756 331,517 Sabanes-Oxley Control Rationalization SCP252 </td <th></th> <td></td> <td>Sale of Platte City</td> <td>FAC550</td> <td>46,920</td> <td>145,122</td> <td>149,621</td> <td>154,259</td> <td>159,041</td> <td>81,986</td> <td>736,948</td>			Sale of Platte City	FAC550	46,920	145,122	149,621	154,259	159,041	81,986	736,948
Street Light Maintenance SCP251 2,639 111,018 100,100 100,128 19,962 10,368 345,215 Supply Staffing PL106 1,715,000 1,227,000 2,842,000 2,842,000 2,842,000 2,842,000 1,427,000 2,9404 323,044 257,028 124,284 1,154,815 1,100,486 Union Uplift HR101 (1,009,902) (3,079,072) (2,948,288) (2,708,038) (1,355,186) (1,100,486 Wegetation Mgmt SCP300 2,317,152 3,055,074 3,761,178 5,968,315 2,551,756 2,689,011 20,342,486 Wood Poles Di5200 0 120,415 62,837 75,458 91,098 56,531 406,339 Non-ELT Meals & Travel HR106 1,349,987 1,341,284 1,241,921 1,481,047 244,801 5,659,041 T&D Line Contractors SCP304 4,481,871 5,149,804 3,093,368 6,455,235 5,177,273 24,357,550 Power Tech - Eliminate Program ENS500 ENS50 109,293 <			Six Sigma Prog Office Elim	GEN907	47,493	97,930	100,965	104,095	107,322	55,325	513,130
Supply Staffing PLT106 1,715,000 1,127,000 1,227,000 Transm & Subst Labor TRN100 13,500 162,555 274,404 323,044 257,028 124,284 1,154,815 Union Uplift HR101 (1,009,902) (3,079,072) (2,948,288) (2,708,038) (1,356,011 20,342,486 Wegetation Mgmt SCP300 2,317,152 3,055,074 3,761,178 5,968,315 2,551,756 2,689,011 20,324,486 Wood Poles DIS200 0 120,415 62,837 75,458 91,098 56,531 406,339 Freight & Shipping SCP907 7,065 50,299 73,853 87,651 77,372 28,200 326,441 T&D Line Contractors SCP304 4,481,871 5,149,804 3,093,368 6,455,235 5,177,273 24,357,550 Power Tech - Eliminate Program ENS500 109,293 111,270 113,285 57,669 391,517 Sarbanes-Oxley Control Rationalization SCP252 264,178 648,120 753,352 77			Street Light Maintenance	SCP251	2,639	111,018	101,100	100,128	19,962	10,368	345,215
Image: Provide the strength of the stre			Supply Staffing	PLT106		1,715,000	1,127,000				2,842,000
Union Uplift HR101 (1,009,902) (3,079,072) (2,948,288) (2,708,038) (1,355,186) (11,100,486) Vegetation Mgmt SCP300 2,317,152 3,055,074 3,761,178 5,968,315 2,551,756 2,689,011 20,342,486 Wood Poles DIS200 0 120,415 62,837 75,458 91,098 56,531 40,6339 Freight & Shipping SCP907 7,065 50,299 78,853 87,651 77,7372 28,201 326,441 Non-ELT Meals & Travel HR106 1,349,987 1,341,284 1,241,921 1,481,047 244,801 5,659,041 T&D Line Contractors SCP304 4,481,871 5,149,804 3,093,368 6,455,235 5,177,273 24,357,550 Power Tech - Eliminate Program ENS500 109,293 111,270 113,285 57,669 391,517 Other Employer Payroll Tax Reduction HR104 11,990 36,554 44,814 62,878 89,270 49,026 294,532 Cherry Efficiency Programs <td< td=""><th> </th><td></td><td>Transm & Subst Labor</td><td>TRN100</td><td>13,500</td><td>162,555</td><td>274,404</td><td>323,044</td><td>257,028</td><td>124,284</td><td>1,154,815</td></td<>			Transm & Subst Labor	TRN100	13,500	162,555	274,404	323,044	257,028	124,284	1,154,815
Vegetation Mgmt SCP300 2,317,152 3,055,074 3,761,178 5,968,315 2,551,756 2,689,011 20,342,486 Wood Poles DIS200 0 120,415 62,837 75,458 91,098 56,531 406,339 Freight & Shipping SCP907 7,065 50,299 75,853 87,651 77,372 28,201 326,441 Non-ELT Meals & Travel HR106 1,349,987 1,341,284 1,241,241 1,481,047 244,801 5,659,041 T&D Line Contractors SCP304 4,481,871 5,149,804 3,093,368 6,455,235 5,177,273 24,357,550 Power Tech - Eliminate Program ENS500 109,293 111,270 113,285 57,669 391,517 Sarbanes-Oxley Control Rationalization SCP252 264,178 648,120 735,352 758,976 774,301 387,649 3,154,945 Other Employer Payroll Tax Reduction HR104 11,990 36,554 44,814 62,878 89,270 49,026 294,532 Revenue			Union Uplift	HR101		(1,009,902)	(3,079,072)	(2,948,288)	(2,708,038)	(1,355,186)	(11,100,486)
Wood Poles DIS200 0 120,415 62,837 75,458 91,098 56,531 406,339 Freight & Shipping SCP907 7,065 50,299 75,853 87,651 77,372 28,201 326,441 Non-ELT Meals & Travel HR106 1,349,987 1,341,984 1,241,921 1,481,047 244,801 5,659,041 T&D Line Contractors SCP304 4,481,871 5,149,804 3,093,368 6,455,235 5,177,273 24,357,550 Power Tech - Eliminate Program ENS500 109,293 111,270 113,285 57,669 391,517 Sarbanes-Oxley Control Rationalization SCP252 264,178 648,120 735,352 758,976 774,301 387,0664 3,567,991 Other Employer Payroll Tax Reduction HR104 11,990 36,554 44,814 62,878 89,270 49,026 2,863,187 16,011,289 Revenue Revenue Assurance CUS600 2,081,202 2,622,884 3,232,197 2,634,138 2,746,740 1,632,859 15,0			Vegetation Mgmt	SCP300	2,317,152	3,055,074	3,761,178	5,968,315	2,551,756	2,689,011	20,342,486
Freight & Shipping SCP907 7,065 50,299 75,853 87,651 77,372 28,201 326,441 Non-ELT Meals & Travel HR106 1,349,987 1,341,284 1,241,921 1,481,047 244,801 5,659,041 T&D Line Contractors SCP304 4,481,871 5,149,804 3,093,368 6,455,235 5,177,273 24,357,550 Power Tech - Eliminate Program ENS500 109,293 111,270 113,285 57,669 391,517 Sarbanes-Oxley Control Rationalization SCP252 264,178 648,120 735,352 758,976 774,301 387,064 3,567,991 Other Employer Payroll Tax Reduction HR104 11,990 36,554 44,814 62,878 89,270 49,026 294,532 Energy Efficiency Programs ENS600 18,767 2,209,459 2,898,094 3,895,137 4,126,645 2,863,187 16,011,290 Revenue Revenue Assurance CUS600 2,081,202 2,622,884 3,323,197 2,634,138 2,746,740 1,632,859 <			Wood Poles	DIS200	0	120,415	62,837	75,458	91,098	56,531	406,339
Non-ELT Meals & Travel HR106 1,349,987 1,341,284 1,241,921 1,481,047 2044,801 5,659,041 T&D Line Contractors SCP304 4,481,871 5,149,804 3,093,368 6,455,235 5,177,273 24,357,550 Power Tech - Eliminate Program ENS500 109,293 111,270 113,285 57,669 391,517 Sarbanes-Oxley Control Rationalization SCP252 264,178 648,120 735,352 758,976 774,301 387,604 3,567,991 Other Employer Payroll Tax Reduction HR104 11,990 36,554 44,814 62,878 89,270 49,026 294,532 Energy Efficiency Programs ENS600 18,767 2,209,459 2,898,094 3,895,137 4,126,645 2,863,187 16,011,289 Revenue Revenue Assurance CUS600 2,081,202 2,622,884 3,323,197 2,634,138 2,746,740 1,632,859 15,041,020 Uby Asset Recovery SCP201 8,043 1,789,828 1,116,695 19,770 0 2,293,336			Freight & Shipping	SCP907	7.065	50.299	75,853	87.651	77.372	28.201	326.441
T&D Line Contractors SCP304 4,481,871 5,149,804 3,093,368 6,455,235 5,717,273 24,357,550 Power Tech - Eliminate Program ENS500 109,293 111,270 113,285 57,669 391,517 Sarbanes-Oxley Control Rationalization SCP252 264,178 648,120 735,352 758,976 774,301 387,0664 3,567,991 O&M to Capital PUT900 - 6,265,581 8,317,383 (1,600,681) (1,044,90,286 Other Employer Payroll Tax Reduction HR104 11,990 36,554 44,814 62,878 89,270 49,026 2,863,187 16,011,289 Revenue Revenue Assurance CUS600 2,081,202 2,622,884 3,323,197 2,634,138 2,746,740 1,632,859 15,041,020 Westinghouse Meter Exchange DIS600 2,0614,612 64,561,991 83,023,990 83,073,379 75,532,276 40,703,068 36,759,9317 Regulated Total 20,614,612 64,561,991 83,023,990 83,073,379 75,532,276 40,703,068			Non-ELT Meals & Travel	HR106	.,	1,349.987	1,341.284	1,241.921	1,481.047	244.801	5,659.041
Power Tech - Eliminate Program ENS500 109,293 111,270 113,285 57,669 31,517 Sarbanes-Oxley Control Rationalization SCP252 264,178 648,120 735,352 758,976 774,301 387,064 3,567,991 O&M to Capital PLT900 6,265,581 8,317,383 (1,600,681) (1,041,694) 11,940,589 Other Employer Payroll Tax Reduction HR104 11,990 36,554 44,814 62,878 89,270 49,026 294,533 Revenue Revenue Assurance CUS600 18,767 2,209,459 2,898,094 3,895,137 4,126,645 2,863,187 16,011,289 16,014,289 Revenue Revenue Assurance CUS600 2,081,202 2,622,884 3,323,197 2,634,740 1,632,859 15,014,020 Supply Asset Recovery SCP201 8,043 1,789,828 1,116,695 19,770 0 2,934,336 Westinghouse Meter Exchange DIS600 103,274 229,854 217,545 70,179 620,852 Regulated T			T&D Line Contractors	SCP304	t	4,481.871	5,149.804	3,093.368	6,455,235	5,177.273	24.357.550
Sarbanes-Oxley Control Rationalization SCP252 264,178 648,120 735,352 758,976 774,301 387,064 3,567,991 O&M to Capital PLT900 6,265,581 8,317,383 (1,600,681) (1,041,694) 11,940,589 Other Employer Payroll Tax Reduction HR104 11,990 36,554 44,814 62,878 89,270 49,026 294,532 Energy Efficiency Programs ENS600 18,767 2,209,459 2,898,094 3,895,137 4,126,645 2,863,187 16,011,290 Revenue Revenue Assurance CU5600 2,081,202 2,622,884 3,323,197 2,634,138 2,746,740 1,632,859 15,041,020 Supply Asset Recovery SCP201 8,043 1,788,828 1,116,695 19,770 0 2,943,336 Westinghouse Meter Exchange DIS600 103,274 229,854 217,545 70,179 620,852 Regulated Total Constraint Science 102 40,262,369 83,073,379 75,532,276 40,703,068 367,509,317			Power Tech - Eliminate Program	ENS500	1	, ,_,,,,	109.293	111.270	113.285	57.669	391,517
OBM to Capital PLT900 C52512 C50,120 C50,255,81 8,317,333 (1,60,681) (1,04,1,694) C50,255,81 8,317,333 (1,60,681) (1,04,1,694) C50,205,281 C50,210 C50,210 <thc50,210< th=""> C50,210 C50,210</thc50,210<>			Sarbanes-Oxley Control Rationalization	SCP252	264 178	648 120	735 352	758 976	774 301	387 064	3.567 991
Other Employer Payroll Tax Reduction HR104 11,990 36,554 44,814 62,878 89,270 49,026 294,532 Revenue Emergy Efficiency Programs ENS600 18,767 2,209,459 2,898,094 3,895,137 4,126,645 2,863,187 16,011,289 Revenue Revenue Assurance CU5600 2,081,202 2,622,884 3,323,197 2,634,138 2,746,740 1,632,859 15,041,049 Westinghouse Meter Exchange DI5600 2,0614,612 64,561,991 33,073,379 75,532,276 40,703,068 367,509,317 Regulated Total Cread Total 20,614,612 64,561,991 83,023,990 83,073,379 75,532,276 40,703,068 367,509,317			O&M to Capital	PLT900		- 10,120	6.265 581	8.317 383	(1.600 681)	(1.041 694)	11.940 580
Energy Efficiency Programs ENS600 18,767 2,209,459 2,898,094 3,895,137 4,126,645 2,863,187 16,01,289 Revenue Revenue Assurance CUS600 2,081,202 2,622,884 3,323,197 2,634,138 2,746,740 1,632,859 15,041,020 Supply Asset Recovery SCP201 8,043 1,789,828 1,116,695 19,770 0 2,934,336 Westinghouse Meter Exchange DIS600 103,274 229,854 217,545 70,179 620,852 Regulated Total 20,614,612 64,561,991 83,073,379 75,532,276 40,703,068 367,509,377	1 F	Other	Employer Payroll Tax Reduction	HR104	11 990	36 554	44 814	62 878	89 270	49 026	294 522
Revenue Revenue Assurance CUS500 2,003,043 3,023,157 4,120,043 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 2,003,187 10,011,203 10,01,203 10,01,203		Guici	Energy Efficiency Programs	ENS600	19 767	2 209 150	2 898 004	3 895 127	4 126 645	2 862 127	16 011 290
Instance Colore Colore <thcolore< th=""> <thcolore< th=""> <thcolore< <="" td=""><th>1 F</th><td>Revenue</td><td>Revenue Assurance</td><td>CUS600</td><td>2 001 202</td><td>2,203,433</td><td>2,030,094</td><td>2,627,137</td><td>7,120,045</td><td>1 627 000</td><td>15 0/1 020</td></thcolore<></thcolore<></thcolore<>	1 F	Revenue	Revenue Assurance	CUS600	2 001 202	2,203,433	2,030,094	2,627,137	7,120,045	1 627 000	15 0/1 020
Juppy Poster Recovery JUP (2) 0,043 1,763,020 1,116,055 19,770 0 2,934,356 Westinghouse Meter Exchange DIS600 103,274 229,854 217,545 70,179 620,852 Regulated Total 20,614,612 64,561,991 83,023,990 83,073,379 75,532,276 40,703,068 367,509,317		Nevenue	Supply Asset Recovery	SCP201	2,001,202	2,022,004	1 700 000	1 116 605	2,740,740	1,022,009	13,041,020
Image: Instance Image: Im	1		Westinghouse Mater Exchange	DISEOO	1	٥,043	103,028	1,110,055	19,//U	U	2,334,330
negurateu rutar 20,514,512 04,501,991 85,025,990 85,075,379 75,552,276 40,703,058 367,509,377	Rogulate 1	otal	westinghouse weter exchange	טטטנוען	20 614 642	64 564 004	103,274	229,854	217,545	/0,1/9	020,852
	ineguiated 10	u ai			20,014,012	04,301,991	03,023,990	03,073,379	, 3, 332, 270	-0,705,068	307,309,317