EXHIBIT

Exhibit No.:	
Issue(s):	Rate Design/ Cost of Service Study
Witness/Type of Exhibit:	Marke/Direct
Sponsoring Party:	Public Counsel
Case No.:	ER-2014-0258

DIRECT TESTIMONY

OF

GEOFF MARKE

Submitted on Behalf of
the Office of the Public Counsel

UNION ELECTRIC COMPANY D/B/A
AMEREN MISSOURI'S

Case No. ER-2014-0258

** **

Denotes Highly Confidential Information that has been Redacted

December 19, 2014

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase Its Revenues for Electric Service	)))))	Case No. ER-2014-0258

AFFIDAVIT OF GEOFF MARKE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Geoff Marke, of lawful age and being first duly sworn, deposes and states:

1. My name is Geoff Marke. I am a Regulatory Economist for the Office of the Public Counsel.

2. Attached hereto and made a part hereof for all purposes is my direct testimony.

3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

Geoff Marke

Subscribed and sworn to me this 19th day of December 2014.

NOTARY PUBLIC NOTARY SEAL STATE OF MISSOURI

JERENE A. BUCKMAN
My Commission Expires
August 23, 2017
Cole County
Commission #13754037

Jerene A. Buckman
Notary Public

My Commission expires August 23, 2017.

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DIRECT TESTIMONY

OF

GEOFF MARKE

UNION ELECTRIC COMPANY

d/b/a Ameren Missouri

CASE NO. ER-2014-0258

I. INTRODUCTION

Q. Please state your name, title and business address.

A. Dr. Geoffrey Marke, Economist, Office of the Public Counsel (OPC or Public Counsel), P.O. Box 2230, Jefferson City, Missouri 65102.

Q. Please describe your education and employment background.

A. I received a Bachelor of Arts Degree in English from The Citadel, a Masters of Arts Degree in English from The University of Missouri, St. Louis, and a Doctorate of Philosophy in Public Policy Analysis from Saint Louis University (SLU). At SLU, I served as a graduate assistant where I taught undergraduate and graduate course work in urban policy and public finance. I also conducted mixed-method research in transportation policy, economic development and emergency management.

I have been in my present position with OPC since April of 2014 where I have been responsible for economic analysis and policy research in electric and gas utility operations. Prior to joining OPC, I was employed by the Missouri Public Service Commission as a Utility Policy Analyst II in the Energy Resource Analysis Section, Energy Unit, Utility Operations Department, Regulatory Review Division. My primary duties in that role involved reviewing, analyzing and writing recommendations concerning electric integrated resource planning, renewable energy standards, and demand-side management programs for all investor-owned electric utilities in Missouri. I have also been employed by the Missouri

Department of Natural Resources (later transferred to the Department of Economic Development), Energy Division where I served as a Planner III and functioned as the lead policy analyst on electric cases. I have worked in the private sector, most notably serving as the Lead Researcher for Funston Advisory based out of Detroit, Michigan. My experience with Funston involved a variety of specialized consulting engagements with both private and public entities.

Q. Have you testified previously before the Missouri Public Service Commission?

A. Yes, prior to this case I submitted written testimony in EO-2012-0142, EO-2014-0189, GR-2014-0086 and GR-2014-0152.

Q. Have you been a member of, or participated in, any work groups, committees, or other groups that have addressed electric utility regulation and policy issues?

A. Yes. I am currently a member of the National Association of State Consumer Advocates (NASUCA) Distributed Energy Resource Committee which shares information and establishes policies regarding energy efficiency, renewable generation, and distributed generation, and considers best practices for the development of cost-effective programs that promote fairness and value for all consumers. I am also a member of NASUCA's Electricity Committee, which discusses current issues affecting residential electric consumers. Additionally, I have been selected to participate as a "consumer" voice on several working committees toward the development of Missouri's State-Wide Energy Plan currently being undertaken by the Missouri Division of Energy.

Q. What is the purpose of your direct testimony?

A. The purpose of this testimony is: 1) to make OPC's rate design recommendations based on a series of questions submitted by the Commission regarding the stabilization or growth of demand in geographic locations where there is underutilization of existing infrastructure, and 2) to present the results of Public Counsel's Class Cost of Service (CCOS) study in this case and preliminary inter-class rate design recommendations. I will respond to each of the rate design questions the Commission raised in turn first.

II. ECONOMIC DEVELOPMENT RATE DESIGN MECHANISM

Q. Should any rate design mechanism be established to promote stability or growth of customer levels in geographic locations where there is underutilization of existing infrastructure?

A. Properly designed, perhaps. However, there may be other more preferable mechanisms to provide an economic development rate structure which would operate in a more narrowly tailored and efficient fashion than that suggested by the Commission's questions. Examples of approaches adopted in other jurisdictions are included later in this testimony.

As to the Commission's inquiry, OPC offers that geographic locations experiencing population loss can serve as a useful, empirical proxy for infrastructure underutilization for all rate paying classes. However, the Commission should be mindful of certain, albeit limited, benefits to excess capacity. For instance, transmission lines in depopulated areas are often needed to service other areas where population is stable or growing. Further, redundancy in energy infrastructure may be desirable since under-used infrastructure provides a back-up for the rest of the network, particularly in emergency situations. Ultimately, it is likely preferable to maintain existing infrastructure as it would be both difficult and expensive to restore or expand service at a later point if a given area regains population.[1]

If the Commission enacts a mechanism to incentivize demand in an area with underutilized infrastructure, the Commission should be mindful of the potential conflicting policy direction inherent in a rate design mechanism charged with promoting energy usage while other policy is in place attempting to curb energy demand. The tension between economic growth and

[1] Hoornbeek, J. Schwarz. T. (2009) Sustainable Infrastructure in Shrinking Cities: Options for the Future. Kent State. http://www.cudc.kent.edu/projects_research/research/54064004-Sustainable-Infrastructure-in-Shrinking-Cities.pdf

environmental sustainability is persistent, as the Commission is well aware, and merits additional dialogue beyond the scope of this testimony.

Q. Should any rate design mechanism apply to residential, commercial, industrial customers and/or other rate classes, and should it apply to existing customers and/or new customers?

A. If the Commission elects to move forward with an economic development/infrastructure sustainability rate design mechanism, subject to review of the other parties' testimony, OPC suggests that the mechanism be applied to all but the residential and lighting classes. An infrastructure-based economic development rate design mechanism that included the residential class would likely affect too large of a range of income and consumption to justify a class-wide mechanism; too many whose income or consumption indicate they need no incentive, would be afforded a rate reduction in the given geographic area.

However, exclusion of the residential class from this mechanism should be married to Commission consideration of the creation of an "income eligible" residential rate mechanism for economic development purposes. In Ameren's service territory, low-Income rate payers may, and likely do, utilize less power than more affluent ratepayers.[2] If so, a low-income

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[2] Berelson, Serj "Myths of Low-Income Energy Efficiency Programs: Implications for Outreach," ACEEE 2014 Summer Study on Energy Efficiency in Buildings, http://www.aceee.org/files/proceedings/2014/data/papers/7-287.pdf

Opower, 2010. Opower National Survey of Consumer Energy Use and Attitudes, October 2010.

Tetra Tech (Tetra Tech, Inc.). 2012a. "Final Report for the Research and Analysis of Energy Usage for NV Energy Low-income Customers." P. 4–29. http://pucweb1.state.nv.us/PDF/AxImages/DOCKETS_2005_THRU_PRESENT/2009-6/36086.pdf.

———. 2012b. "Final Report for the Research and Analysis of Energy Usage for NV Energy Low-income Customers." P. 4–37. http://pucweb1.state.nv.us/PDF/AxImages/DOCKETS_2005_THRU_PRESENT/2009-6/36086.pdf

Winn, Caroline. Intelligent Utility. 2013.Low-income Customers Want to Engage. December 2013.

residential mechanism could have the dual benefit of improving electricity demand while also fomenting general economic development among users by freeing up scarce funds for other uses. OPC supports the proposition that if an economic development rate mechanism applicable to commercial, industrial and other business ratepayers is implemented in a geographic location, some mechanism should also be afforded to residential ratepayers in that location. A class which has seen negative wage growth in real terms from 2007-2013, while electric rates in Ameren's service territory in the same period have jumped 43.16%, merits relief as much as Missouri's praiseworthy businesses merit relief.

For the non-residential and non-lighting classes, OPC offers that an economic development rate design mechanism should be applicable to customers whose presence (new customer) or absence (existing customers) would materially impact revenue generation from the customer's class, and/or create substantially deleterious primary and secondary externalities felt within the geographic location such that the revenue generated from the class in the geographic location is substantially likely to be negatively affected going forward. Moreover, any rate incentive should be temporal in nature, decreasing over time, and only be available in conjunction with local, regional or state governmental economic development activities where public support has been offered and accepted by the customer to locate new facilities, expand existing facilities, or retain existing facilities in the geographic location.

Q. What geographic locations should be the subject to any such rate design mechanism?

A. To determine appropriate geographic locations, OPC suggests that the Commission consider the Missouri Office of Administration—Division of Budget and Planning's work entitled "Missouri Population Projections—Preferred Series."[3] This work examines projected birth, death and net migration movement on a county-wide basis from 2000 to 2030. In addition,

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http://www.intelligentutility.com/magazine/article/337263/low-income-customers-wantengage

[3] Missouri Office of Administration: Division of Budget & Planning (2014) Population Projections: 2000 – 2030 Projections. http://oa.mo.gov/budget-planning/demographic-information/population-projections/2000-2030-projections

the Commission should consider known changes in population as measured between the most recent two decennial censuses. Further, within St. Louis County the Commission should consider communities considered distressed under Missouri law, all but one of which have experienced population loss as determined in the last census. On a whole, population declines are correlated with underutilized infrastructure, and would appear to be an appropriate metric from which to base an economic development rate design mechanism tied to infrastructure underutilization.

Q. What is the Missouri Population Projection—Preferred Series and what does it say with respect to counties where Ameren Missouri operates?

A. Completed in 2008, The Missouri Population Projection—Preferred Series utilized a demographic technique called the "cohort-component," where 2000 U.S. Census data was utilized to generate projections out to the year 2030 and which is presented across 114 counties and the city of St. Louis at five-year intervals. The population projected at the end of a given five-year time period served as the "beginning population" for the next five-year period.

The basic equation is as follows:

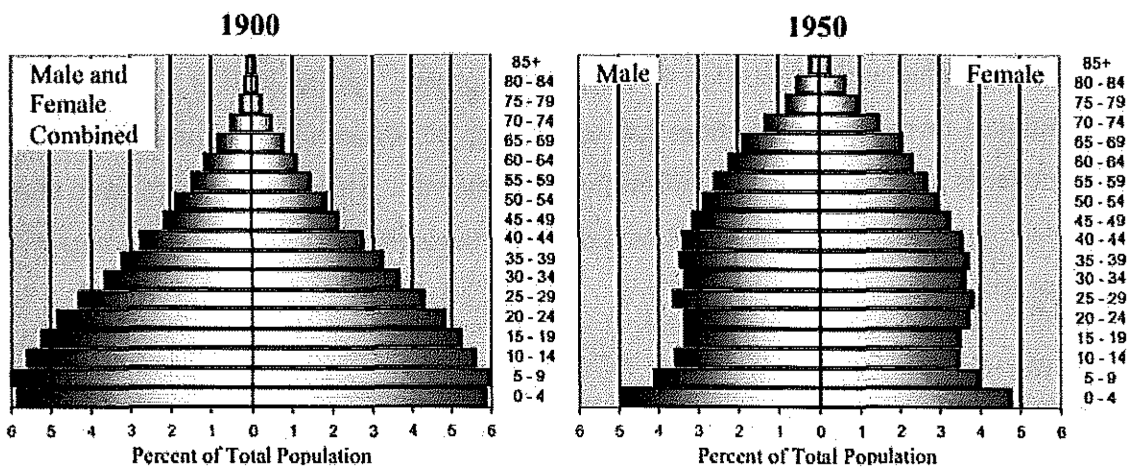
> Population at the beginning of the time period + births for the time period – deaths for the time period +/- migration for the time period = projected population at the end of the time period.[4]

These projections (births, death, migration) are based on historical trends for each of the age cohorts (e.g., x% of males age 55-59 historically survive to age 60-64) and then projected on a county-by-county basis.

[4] Missouri Office of Administration: Division of Budget & Planning (2014) Population Projections: Methodology. http://oa.mo.gov/budget-planning/demographic-information/population-projections/methodology

According to the population projections, Missouri is expected to approach 6.8 million people in 2030, a growth of roughly 1.2 million people from the year 2000, or a 21% increase to the state's population. Even though Missouri's overall population is expected to increase, demographic trends suggest that the make-up will reflect nation-wide trends of an aging population where 1 out of 5 citizens will be seniors.[5] This can be seen by looking at the breakdown of age and gender cohorts in Missouri from 1900 to the 2030 projections as shown in figure 1.

<u>Figure 1: Missouri population pyramids: population by age-sex cohort as a percentage of total population</u>[6]



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[5] MERIC (2014) Population Data Series New Population Projections Released. http://www.missourieconomy.org/indicators/population/pop_proj_2030.stm

[6] http://archive.oa.mo.gov/bp/projections/fig1.pdf

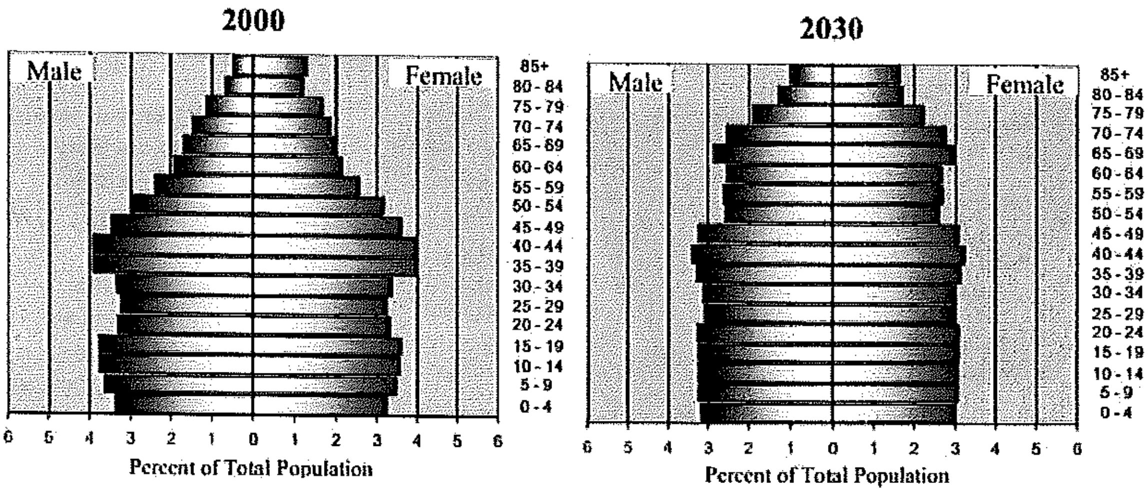


Figure 1 illustrates the historic swings in fertility rates as well as the advancement of modern medical science. According to Missouri's Office of Administration:

> As projected, Missouri's population will have a rectangular cast by 2030. Baby-boomers will swell upper sections of the pyramid to unprecedented widths and long-sustained low levels of fertility will produce consistent narrow bands in the lower half of the age distribution.[7]

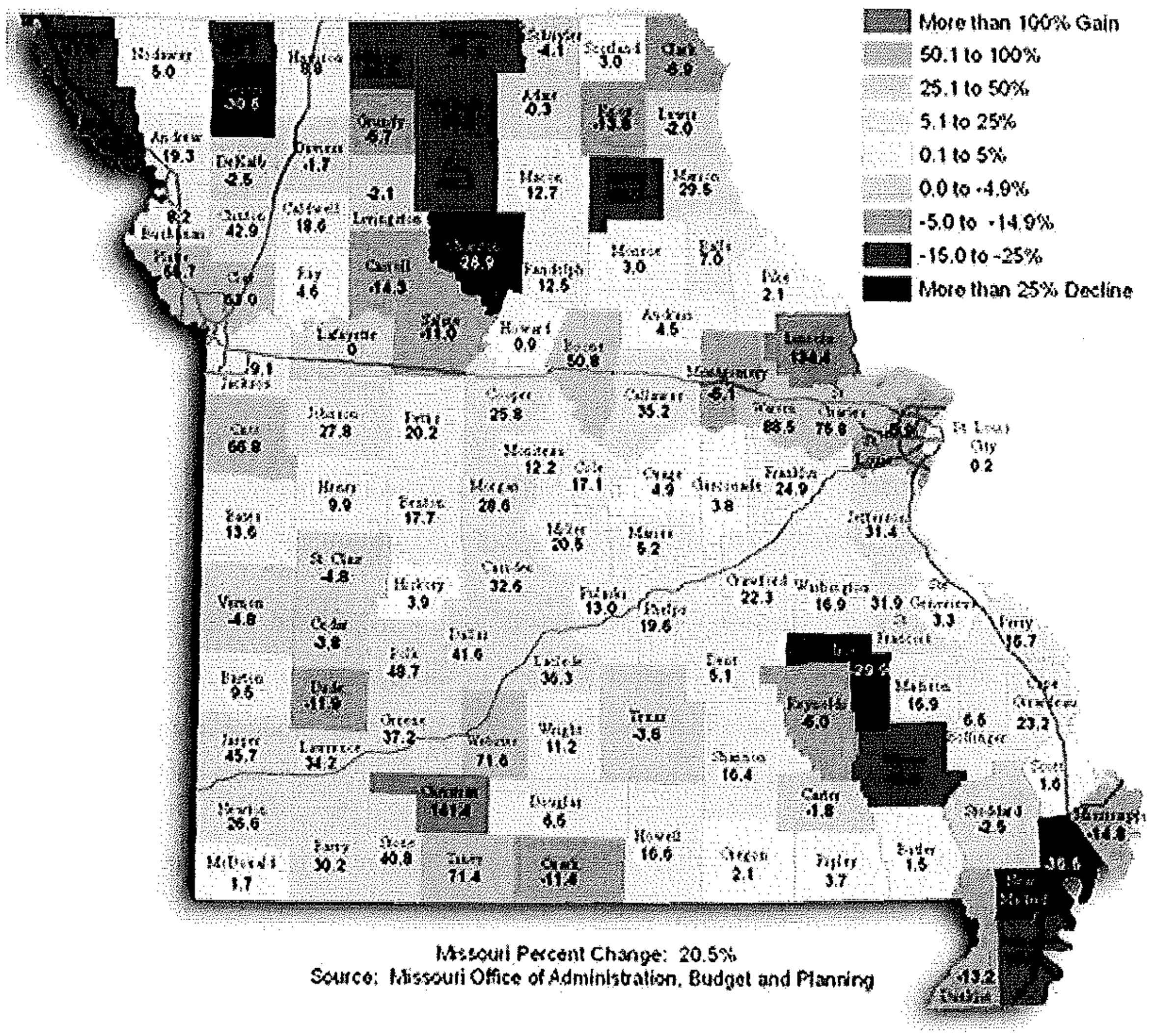
Additionally, population migration patterns suggest that residents will be more densely concentrated near and around larger cities.

As a result of the combined effects of aging and population migration, 39 (largely rural) out of 114 counties are projected to experience a decline in population by 2030. Figure 2 is a map of the projected percent change in population by county from 2000 to 2030.[8]

[7] http://oa.mo.gov/budget-planning/demographic-information/population-projections/population-trends

[8] MERIC (2014) Population Data Series New Population Projections Released. http://www.missourieconomy.org/indicators/population/pop_proj_2030.stm.

Figure 2: Missouri Percent Change in Population, 2000 to 2030.



Based on information supplied in Ameren Missouri's minimum filing requirements, table 1 includes all counties Ameren Missouri services at least in part and the projected negative population shift from 2000 to 2030.

Table 1: 2000-2030 Projected Negative Population Shift within Ameren Missouri Counties

County	% Change	County	% Change
Adair	-0.3	Livingston	-2.1
Caroll	-14.3	Mississippi	-14.8
Chariton	-26.9	Montgomery	-5.1
Clark	-6.9	Pemiscot	-18
Daviess	-1.7	Reynolds	-6
Dekalb	-2.5	St. Louis County	-5.9
Dunklin	-13.2	Saline	-11
Gentry	-30.6	Schuyler	-4.1
Iron	-29.9	Stoddard	-2.5
New Madrid	-36.5	Sullivan	-19.4
Linn	-22.2		

Q. Why is a population decline significant?

A. Declining population is correlated to less economic activity in a given area, property devaluation, higher crime, smaller workforce and lower tax rolls. In certain circumstances, a declining population can also create a labor shortage, which can have a large impact in counties with labor-intensive sectors. The aforementioned projected declines (and increases in other counties) are far greater than what was seen during the last two census releases.

Q. What counties experienced a population decline as measured between the 2000 and 2010 censuses?

A. Table 2 provides a list of the same counties and the known negative changes in population as measured between the most recent two decennial censuses (2000-2010). [9]

[9] Missouri: County Population Change 2000 to 2010 Numeric and Percent Change http://archive.oa.mo.gov/bp/pdffiles/MoCoPop2000-2010.pdf

Table 2: 2000-2010 Negative Population Shift within Ameren Missouri counties

County	% Change	County	% Change
Audrain	-1.3	Linn	-7.2
Carroll	-9.6	Monroe	-5.1
Chariton	-7.2	New Madrid	-4.1
Clark	-3.7	Pemiscot	-8.7
Dunklin	-3.6	Reynolds	-0.1
Gentry	-1.8	St. Louis City	-8.3
Howard	-0.7	St. Louis County	-1.7
Iron	-0.6	Saline	-1.6
Knox	-5.3	Scotland	-2.8
Lewis	-2.7	Sullivan	-7

Q. What population loss has occurred and is projected to occur in St. Louis County?

A. St. Louis City is expected to remain relatively flat in terms of population, but lost 8.3% of its population between 2000 and 2010. St. Louis County lost 1.7 of its population in that same period and is projected to lose approximately 60,000 residents overall by 2030. This change represents a loss of 5.9% (2000 to 2030), and would be the greatest statewide loss in terms of absolute residents because of the county's overall size. Because of St. Louis County's dense population and broad socio-economic range of municipalities, there is much variation within the county itself, portions of the county are reasonably expected to remain flat in population, other portions are expected to grow. Most population loss is expected to be felt in the northern part of the county, which also corresponds to the geographic locations of its legally designated distressed communities.

Q. Does OPC have any recommendations on how to approach St. Louis County?

A. If the Commission elects to move forward with an economic development/infrastructure rate design mechanism, OPC suggests that St. Louis County's density, municipal make-up, and diverse economic range be taken into consideration. The Commission should strongly consider that a further designation, "distressed community," be utilized to allow certain sections of St. Louis County to be eligible for the proposed mechanism and to exclude those areas within the County that clearly need no incentive to foment growth.

Q. How is a distressed community defined?

A. Section § 135.530, RSMo, defines a distressed community as:

> either a Missouri municipality within a metropolitan statistical area which has a median household income of under seventy percent of the median household income for the metropolitan statistical area, according to the last decennial census, or a United States census block group or contiguous group of block groups within a metropolitan statistical area which has a population of at least two thousand five hundred, and each block group having a median household income of under seventy percent of the median household income for the metropolitan area in Missouri, according to the last decennial census.[10]

Q. What communities within St. Louis County are currently considered distressed under the aforementioned definition?

A. According to the Missouri Rebuilding Communities Tax Credit Program, the following communities listed in table 2 have been designated as "distressed communities" in St. Louis County: [11]

[10] http://law.justia.com/codes/missouri/2005/t10/1350000530.html

[11] Missouri Department of Economic Development (2014) Rebuilding Communities Tax Credit Program Application & Guidelines. http://www.ded.mo.gov/upload/ProgramAndApplications.pdf

Table 2: Distressed communities within St. Louis County

Bel-Ridge	Hillsdale	Pagedale
Berkeley	Jennings	Pine Lawn
Breckenridge Hills	Kinloch	Riverview
Cool Valley	Maplewood	Velda City
Country Club Hills	Marlborough	Velda Village Hills
Edmundson	Normandy	Vinita Park
Ferguson	Northwoods	Wellston
Flordell Hills	Norwood Court	

Q. Can you provide similar population declines for these communities?

A. The Missouri Population Projection—Preferred Series does not break down population projections at the municipal level. However, specific data on municipal population decline at the St. Louis County level was made available through the assistance of St. Louis's East-West Gateway Council of Governments and is based on US Census data from 2000 to 2010 as seen in table 3.

Table 3: St. Louis County "distressed communities" population change 2000-2010

City	% Change	City	% Change
Bel-Ridge	-11.2	Marlborough	-2.5
Berkeley	-10.8	Normandy	-2.81
Breckenridge Hills	-1.5	Northwoods	-8.96
Cool Valley	10.6	Norwood Court	-9.6
Country Club Hills	-7.7	Pagedale	-8.6
Edmundson	-0.7	Pine Lawn	-22.1
Ferguson	-5.4	Riverview	-9.2
Flordell Hills	-11.7	Velda City	-12.1
Hillsdale	-0.1	Velda Village Hills	-3.2
Jennings	-4.9	Vinita Park	-2.3
Kinloch	-33.6	Wellston	-6.98
Maplewood	-12.8		

As seen in table 3, 22 of the 23 distressed communities experienced population decline from 2000 to 2010.[12] As an aside, even though St. Louis City is projected to have a flat growth projection, it, too, is listed as a distressed community.

Q. Should a rate design mechanism be available only at the discretion of the company?

A. No. The rate design mechanism should be an automatic process where a customer is eligible under the Commission's explicit criteria. This testimony will later provide evidence as to what has happened to date in situations where the rate design mechanism was solely at the discretion of the utility.

Q. What are the appropriate eligibility criteria for any such rate design mechanism?

A. OPC would suggest the following eligibility criteria:

- A Missouri county other than St. Louis County which has experienced a population decline as measured by the difference in population counted between the last two decennial censuses and which is projected to experience a decline in population going forward according to the Missouri Population Projection—Preferred Series; or,
- A specific municipality within St. Louis County that has been classified as a "distressed community" under § 135.530, RSMo, and
- Consistent with the Commission-approved Economic Development Rider authorized for KCPL-MO and GMO:
    - Projected average monthly peak demand of at least 200 kW during the first two years
        - The next three years, customers need to maintain an average monthly peak demand of at least 200 kW

[12] The single distressed community experiencing a population increase is actually rather small in terms of population, and so, the 10.6% increase represents comparatively little actual growth.

- Annual load factor projected to equal or exceed 55% within two years of the date the customer first received service
  - The next three years, customer must maintain 55% for year's three to five.
- Beneficial location of new or expanded facilities.
- Prohibition on load shifting for existing/expanding customers.
- Offered in conjunction with Federal, State, Regional or Local governmental economic development activities.

- Other criteria should include:
  - Creation of new permanent full-time jobs in the designated geographic location;
  - Minimum capital investment commitment.
- Revenue to be received from customer over the term of the contract should be greater than the applicable incremental cost to provide electric service—ensuring a positive contribution to fixed costs.

Q. Would a new rate design mechanism promote efficient utilization of the Company's existing infrastructure?

A. A rate design targeted to attracting new customers or retaining existing customers in areas where existing infrastructure is currently underused or is projected to be underutilized, and as outlined in this testimony, could be a viable new rate design mechanism. Furthermore, confining the mechanism to counties projected to experience declining population rates and distressed communities in St. Louis County can produce additional positive externalities for the region as a whole.

Q. Would a new rate design mechanism be reasonably related to the cost of serving eligible customers?

A. As contemplated by OPC, a properly designed and targeted economic development rate mechanism should bear a reasonable relationship to the cost of serving eligible customers. Were a discount to be considered that might allow a customer to pay below the utility's cost to serve the customer's class, the application for such a discount should be considered and approved specifically by the Commission.

The relative success of KCP&L-MO and GMO's economic development design mechanisms, and the continued promotion of similar such riders in other states, suggest that a an economic development rate design mechanism can work and remain reasonably related to the cost of serving eligible customers. Moreover, and to be discussed in greater detail later in this testimony, an incremental cost analysis should be performed on an annual basis to verify that benefits outweigh costs in promoting such a mechanism.

Q. Would a new rate design mechanism be in the public interest?

A. An Economic Development Rider designed to encourage business development in areas where population has declined or is projected to decline could act, if properly designed, as a preventive measure against existing and/or future economic hardship. The mechanism must be designed to attract capital expenditures to the State, diversify Ameren Missouri's customer base, create jobs, and serve to improve the efficient utilization of existing facilities and transmission infrastructure. As OPC reviews additional testimony supplied by the other parties on these questions, OPC may make additional recommendations.

Q. Please comment on similar rate design mechanisms in Missouri, currently or historically, including the existing Economic Re-Development Rider available to portions of the City of St. Louis, and their effectiveness.

A. Ameren Missouri currently has two Economic Development Riders both designed to encourage new industrial and commercial development and to retain existing load where possible. The components of the two riders can be broken down as follows:

1.) Ameren Missouri Rider ERR: Economic Re-Development Rider

- **Site specific:** to previously vacant sites (of at least 180 days) within St. Louis City (service territory maps provided in tariff).
- **Eligibility:** to 3(M) Large General Service Rate, 4 (M) Small Primary Service Rate, or 11 (M) Large Primary Service Rate.
    - Must have average monthly peak of at least 500 kW during each contract year.
    - Only available in conjunction with Federal, State, Regional or Local governmental economic development activities.
    - Not available to successor customer that results in load shifting from one location on Company's system to a qualifying site—unless approved by Company.
    - Limited to loads, which in the Company's sole judgment, utilize existing infrastructure in a manner which is beneficial to the local electric service delivery system.
- **Incentive provisions:** Can come in two forms and are at the discretion of the Company.
    - Facilities and relocation charges
        - Upon customer's request and Company's consent.
        - Net relocation cost chargeable to customer may be offset in part by an amount not to exceed 50% of any net annual revenue estimated to be derived from customer's premises.
        - And not utilized in meeting the Company's tariff provisions governing extensions to non-residential customers.
    - Discount from standard tariff
        - Customer enters into contract with Company that is mutually agreeable.
        - Customers eligible for a 15% discount from otherwise applicable base rate tariff charges, before application of taxes.
        - Customers have to have annual peak demand of at least 500 kW and an annual load factor exceeding 55%.
        - Discount remains in effect for 60 months (5 years).

        - No customers residential or retail in nature.

- **Results**: According to Ameren Missouri's response to Staff data request 0441:

    No customer has participated in the Economic Re-Development Rider (ERR) tariff.

2.) **Ameren Missouri Rider EDRR: Economic Development and Retention Rider**

- **Site specific:** No.
- **Eligibility:** to 3(M) Large General Service Rate, 4 (M) Small Primary Service Rate, or 11 (M) Large Primary Service Rate.
    - Only available at Company's sole discretion
    - Applicable only to customers who: 1) are either currently being serviced by other electric options or have other viable electric options available to choose from; 2) have an obligatory affidavit stating customer's intent to use other viable electric option
    - Must have average monthly peak of at least 500 kW during each contract year.
    - Annual load factor projected to equal or exceed 55% during the entire term of Rider
    - Only available in conjunction with Federal, State, Regional or Local governmental economic development activities.
- **Incentive provisions:** Are at the discretion of the Company.
    - Contract, service, terms and conditions agreed with Company.
    - Revenues received from customer over the term of the contract shall be greater than the applicable incremental cost to provide electric service, as determined by the Company, ensuring a positive contribution to fixed costs.
    - Discount from standard tariff
        - Not to exceed 15% discount before tax additions
        - Not to exceed five-years in length

- **Results:** According to Ameren Missouri's response to Staff data request 0441:

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Q. Please continue.

A. It is unclear why there have been no participants to date under either Rider. A cursory look at Ameren Missouri's webpage suggests that information on these Riders may not be readily accessible to the public. Ameren Missouri does have an Economic Development section on their website.[13] However, there are no links, descriptions, or notices of the availability of the aforementioned Riders to prospective customers. Only through a specific search query on Ameren's webpage would a customer be taken to the Electric Full Service Rates for Ameren Missouri, which essentially is Ameren Missouri's tariff sheet broken down into its component parts.[14] Such a query requires the customer to know in advance precisely what to look for.

Q. What about KCP&L-MO and GMO? Do they offer an Economic Development Rider?

A. Yes, they do. Both KCP&L-MO and GMO offer an Economic Development Rider that has proven to be more successful to date.

1.) KCPL-MO & GMO Economic Development Rider

- **Site specific:** No.
- **Eligibility:** to company's Medium General Service, Large General Service, or Large Power Service rate schedules.

[13] https://www.ameren.com/business-partners/ec-dev
[14] https://www.ameren.com/missouri/rates/electric-full-service-bundle

- o Must have *projected average monthly peak of at least 200 kW* during first two years.
  - ▪ Must maintain average monthly peak of at least 200 kW during years three to five.
- o Annual load factor *projected to equal or exceed 55%* within two years of the date the customer first receives service.
  - ▪ Must maintain 55% or above for years three to five.
    - If not able to be met…
- o *Other criteria can be utilized including:*
  - ▪ *100 or more new permanent full-time jobs created or percentage increased in existing permanent full-time jobs;*
  - ▪ *Capital investment of $5 million or more*
  - ▪ *Additional Off-peak Usage*
- o Only available in conjunction with Federal, State, Regional or Local governmental economic development activities.
- o Not available to successor customer that results in load shifting from one location on Company's system to a qualifying site—unless approved by Company.
- o No selling or providing goods and/or services directly to the general public
- o Revenues to be received from customer over the term of the contract shall be greater than the applicable incremental cost to provide electric service—ensuring a positive contribution to fixed costs.

- **Incentive provisions:** Can come in two forms and are at the discretion of the Company.
  - o Discount from standard tariff
    - ▪ Pre-tax revenues under Rider shall be determined by reducing otherwise applicable charges according to rate schedule, by:
      - *Year 1 = 30%*
      - *Year 2 = 25%*
      - *Year 3 = 20%*

        - *Year 4 = 15%*
        - *Year 5 = 10%*
    - *Optional Year 6 = 10% if Company determines utilization of existing infrastructure is beneficial to the local electric delivery system.*
- **Incremental Cost Analysis:**
    - *A confirmation that revenues received from customers under the rider are sufficient to cover the utilities increased costs to service, the utility will provide an analysis of the results in their triennial and annual updates filed under the Commission's Chapter 22 Electric utility Resource Planning Rules.*
- **Results**: In October, 2013, KCP&L and KCP&L GMO received approval for revised Economic Development Rider tariffs. Since that time, there have been four applications approved for an EDR in both the KXCP&L jurisdiction and the GMO jurisdiction, for a combined total of eight.

Q. Please continue.

A. On a whole, KCPL-MO/GMO has offered a more attractive, flexible, and successful Economic Development Rider than Ameren Missouri has. There is a greater range in the eligibility criteria and more attractive savings opportunities for prospective customers. The resulting participation in new and existing/expanding customers taking advantage of this Rider suggests that the greater Kansas City region and ratepayers on a whole are benefiting from its inclusion. According to KCP&L's responses to OPC inquires, the targeted companies appear to be creating goods or services that are being exported out of the region and bringing back wealth, jobs and economic value.

A cursory look at KCP&L's website demonstrates that their Rider is readily accessible to the public. Like Ameren Missouri, KCP&L has an Economic Development section on their website. [15] Unlike Ameren Missouri, there are clear links that include a description of the

[15] http://www.kcpl.com/about-kcpl/economic-development/incentives

Economic Development Rider incentives, the application material, eligibility criteria, and contact information all without having to leave the Economic Development section or otherwise search through the Company's tariff.

Q. Does Empire Electric have an Economic Development Rider?

A. No.

Q. Please comment on any similar rate design mechanisms in other states and their effectiveness.

A. Attached hereto is GM-1, a breakdown of Economic Development Rider parameters from neighboring states, including: the applicable utility company, discounts provided, and qualifications imposed. Attachment GM-2 includes copies of each of the Economic Development Rider tariff sections that are included in attachment GM-1 for further detail.

Although there is variation among utilities in how Economic Development Riders are being designed and implemented, many of the same parameters are consistent, including:

- Rider is only offered to Commercial and Industrial customers of a certain size.
- It is temporal in nature—not designed to last in perpetuity.
- Revenues received are greater than the applicable incremental costs to provide electric service—ensuring a positive contribution to fixed costs.
- Load-shifting is largely prohibited.

OPC has been unable to locate an Economic Development Rider centered on maintaining or otherwise preventing the underutilization of existing infrastructure, though, this attribute appears to be a by-product of the larger intent of encouraging economic growth. The suggestions made by OPC in this testimony have been formulated under the direction of the questions posed by the Commission. If the Commission elects to move forward with such a rate design mechanism, a rider targeted at communities and counties likely to experience a significant population decline would help ensure that economic opportunities are centered on sections of Ameren Missouri's service territory most at risk of infrastructure underutilization.

III. CLASS COST OF SERVICE STUDY

Q. Has OPC prepared a class cost of service (CCOS) study for this case?

A. Yes. OPC has prepared a CCOS study and is submitting two versions, the details of which will be explained later in this testimony.

Q. What is the main purpose of performing a CCOS Study?

A. The primary purpose of a CCOS study is to determine the COS for each customer class by allocating costs in a reasonable manner. Class COS studies also provide guidance for determining how rates (e.g., customer charges) should be designed to collect revenues from customers within a class, depending on customer usage levels and patterns.

Q. Please outline the basic elements of the CCOS study.

A. The three primary steps that must be taken in order to perform a CCOS include functionalization, classification, and allocation of costs.

The first step is the functionalization of costs, which involves categorizing accounts by the type of function with which an account is associated. Accounts can be categorized as being related to Production, Transmission, Distribution, Customer Accounts, etc., depending on the electric utility functions of which they are a part.

The second step involves taking those functionalized costs and then classifying them as being demand-related, energy-related or customer customer-related, depending on the function with which they are associated.

Q. Can you explain what you mean by demand-related costs?

A. Yes. Demand-related costs are associated with meeting maximum electricity demands. Electric substations and line transformers are designed, in part, to meet maximum customer demand requirements. The most common demand allocation factors used in a CCOS are those related to system coincident peaks (CP) or peak day requirements and customer class non-coincident peaks (NCP).

Q. Can you explain what you mean by energy-related costs?

A. Energy-related costs are defined as those that tend to change with the amount of electricity produced and can be thought of as volumetric-related costs.

Q. Can you explain what you mean by customer-related costs?

A. Customer-related costs are those associated with connecting customers to the distribution system, metering household or business usage, and performing a variety of other customer support functions.

Q. What is the third and final step?

A. After costs have been functionalized and classified, they are allocated to each respective customer class to represent a reasonable share of jurisdictional costs. Allocation factors are developed based on ratios that represent the proportion of billing determinants or total units (total number of customers, total annual energy consumption, etc…) attributable to a certain customer class. These ratios are then used to calculate the proportion of various cost categories for which a class is responsible.

Q. Is this a relatively simple process?

A. No. Some costs can be identified clearly and directly assigned to a function or category, while others are more ambiguous and difficult to assign. The primary challenge involves treatment of what are known as "joint and common" costs. Given their shared or integrated nature, these joint and common costs can be difficult to compartmentalize into any particular function or category. The process of developing cost allocation factors for these can become subjective and are often imbued with various interpretations and emphases.

Q. Which customer classes has OPC used in its CCOS study?

A. OPC's model includes a residential class (residential), a small general service class (SGS), a combination large general service/small primary service class (LGS/SPS), a large power service class (LPS), a large transmission class (LTS), and a lighting class (lighting). Both versions of OPC's study of the Ameren system employ the same customer classes.

Q. On what data is OPC's CCOS study based?

A. The data used in OPC's CCOS study come from two sources. Data related to investments, expenses, and revenues are from the Staff Accounting Schedules filed on December 5, 2014. Data used to develop allocations related to peak demands, annual energy usage, investment weightings and customer counts come from the Company's direct testimony work papers.

Q. How did OPC allocate intangible plant in its CCOS study?

A. Intangible plant (account no. 301) is related to organization costs and includes all fees paid to the federal or state government for the privilege of incorporation, along with related expenditures. OPC used a gross plant allocator for intangible plant because intangible plant should be allocated to each customer class according to the benefits each class receives from the service the company provides.

Q. How did OPC allocate production plant in its CCOS study?

A. Production plant involves the cost of structures, land, and equipment that are used in power generation. Because demand and energy components of a system's load are important in determining production plant costs, OPC used allocators that account for both. In version one of the CCOS, OPC used an "average and 4CP (4 coincident peak)" allocator. The average portion comes from average annual energy use, and the 4CP represents coincident peak demand based on the class demands during the 4 highest monthly system peak hours. In version two of the study, OPC used an "average and excess 4NCP (4 non-coincident peak)" allocator for production plant, which is the only difference between the two versions of the study. The average portion is again estimated from average energy use. Excess demand comes from the difference between the sum of all classes' peak demand, irrespective of when it occurs, and average annual energy usage.

Q. Why has OPC conducted two versions of the CCOS study?

A. The "average and 4CP" version of the study is OPC's preferred method, but the "average and excess 4NCP" version is being submitted for consideration only if the Commission rejects the use of the "average and 4CP" method. It is OPC's belief that the "average and excess 4NCP" allocation disproportionately assigns costs to both the residential and SCS classes by concentrating too heavily on a few peak hours and assigning too little weight to annual energy usage.

Q. Why do you use multiple peaks in order to develop the measures of coincident and non-coincident peak used in your production allocators?

A. For both methods, using multiple measures of the peak reduces the probability of relying on an anomalous single peak as the basis of the allocator. Regarding the "average and 4CP" method, a particular class's contribution to the coincident peak can vary widely. The following table illustrates the variance that occurs in class contribution to the 4 coincident peaks in the present "average and 4CP" study:

	Residential	SGS	LGS/SPS	LPS	LTS	Lighting
Jun-13	45.5%	10.7%	29.0%	8.1%	6.8%	0.0%
Jul-13	46.5%	11.1%	28.4%	7.7%	6.4%	0.0%
Aug-13	46.4%	11.7%	27.6%	7.8%	6.5%	0.0%
Jan-14	54.3%	8.7%	23.4%	5.8%	7.0%	0.8%

Lighting, for example, contributes to only one of the coincident peaks used in the study, and the range of contributions of the resident class is from 45.5% to 54.3%. Using only one of these peaks could, therefore, misrepresent a class's contribution to the measure of the system peak.

Q. How did OPC allocate transmission plant?

A. Transmission plant involves the cost of structures, land, and equipment that are used in connection with transmission operations. Transmission facilities are put in place to provide reliable service throughout the year, even during periods of scheduled maintenance, and can at times substitute for generation. Transmission facilities also help minimize the cost of generation facilities through the sales or purchases of power. Accordingly, transmission plant costs can be allocated in the same manner as production plant. Therefore, OPC used the same allocators for transmission plant as were used for production plant.

Q. How did OPC allocate distribution plant?

A. Distribution plant involves the cost of structures, land and equipment used in connection with distribution operations. By means of the distribution plant equipment, high-voltage energy from the transmission system is reduced to lower voltages, delivered to the customer, and monitored in order to determine the amount of energy the customer uses.

OPC's study functionalizes and allocates distribution plant in a way that reflects that distribution facilities provide service at primary and secondary voltage levels, and that some large industrial customers potentially have large electrical requirements for which they choose to take service at primary voltage. Therefore, OPC used different allocation factors in order to allocate costs at different levels of the distribution system.

Q. How did OPC allocate meter-related facilities?

A. Meter-related facilities are generally attributable to each individual customer. When a new customer is added to the system, a new expenditure occurs. Accordingly, meter costs are generally classified as customer related. OPC used a weighted meter investment to allocate meter costs.

Q. How did OPC allocate service-related facilities?

A. Service facilities are customer related. Therefore, OPC allocated service costs based on weighted meter investment.

Q. Please give a summary of the allocations you used for distribution costs.

A. The functional categories and allocations for distribution plant are as follows:

360-362	Distribution Substations	Demand at Primary Station
364	Poles, Towers, and Fixtures	Demand at Primary, Weighted Meter Investment, Demand at Secondary
365	Overhead Conductors & Devices	Demand at Primary, Weighted Meter Investment, Demand at Secondary
366	Underground Conduit	Demand at Primary, Weighted Meter Investment, Demand at Secondary
367	Underground Conductors & Devices	Demand at Primary, Weighted Meter Investment, Demand at Secondary
368	Line Transformers	Transformer Demand, Weighted Meter Investment
369	Services	Weighted Meter Investment
370	Meters	Weighted Meter Investment

Q. How did OPC allocate general plant?

A. General plant involves structures, land, and equipment that are used in support of production, transmission, and distribution plant. It was allocated using a composite allocator based on net non-general plant.

Q. What method did OPC use to allocate expenses?

A. When possible, OPC directly assigned expenses. In all other cases, OPC followed the principle "expenses follow plant" and used the same allocators for the expense accounts that were used for the related production, transmission, and distribution plant accounts. "Expenses follow plant" simply means that operation and maintenance costs associated with a particular type of plant were allocated in the same way as the corresponding plant.

Q. How did OPC allocate power production expenses?

A. OPC divided the power production expenses into demand-related and energy-related purchased power costs. OPC used the demand-related allocators from my study to allocate demand-related expenses. OPC allocated energy-related expenses based on class kWhs at generation.

Q. How did OPC allocate transmission expenses?

A. OPC used the same allocator for transmission expenses that was used for related transmission plant.

Q. How did OPC allocate distribution expenses?

A. OPC used the same allocator for distribution expenses that was used for related distribution plant. OPC allocated expenses that are not associated with distribution plant, such as supervision and engineering, with an aggregate distribution expense allocator based on the sum of the primary portion of accounts 364-367.

Q. How did OPC allocate customer account expenses?

A. OPC used unweighted customer numbers to allocate some account expenses. For meter reading (account 902), OPC used a weighted meter reading allocator. For uncollectible accounts, (account 904), OPC used the Company's allocator. For the rest, OPC used a composite customer account allocator.

Q. How did OPC allocate customer service expenses and sales expenses?

A. OPC used allocators based on customers, weighted customers, or a composite allocator for customer service and sales expenses, including accounts 907, 908, 909, 910, 911, 912, 913, and 916.

Q. How did OPC allocate administrative and general (A&G) expenses?

A. OPC allocated property insurance expense (account 924) based on non-general gross plant. OPC allocated rents (account 931) and maintenance of general plant (account 935) based on general plant. OPC allocated the A&G accounts related to regulatory commission expenses (account 928), franchise expense (account 927) and miscellaneous expense (account 930) based on overall cost of service. OPC allocated the remaining A&G accounts based on payroll.

Q. How did OPC allocate property taxes?

A. OPC based the allocation of property taxes on allocated total gross plant.

Q. How did OPC allocate state and federal income taxes?

A. OPC allocated these taxes according to rate base because a utility company's income taxes will be a function of the size of its rate base. Accordingly, the revenue contributed by a class for income taxes should be in proportion to the amount of rate base required to serve the respective class.

Q. Please describe the results of Public Counsel's class cost of service study.

A. The results of Public Counsel's class cost of service study are shown in Attachment GM-3 and Attachment GM-4. Since the purpose of a CCOS study is to determine the relative cost responsibility of customer classes, the results are based on the assumption that total company revenues remain constant. Lines 11 and 12 of each schedule show the current revenue and percentage of total revenue, respectively, by class. Line 32 of each schedule shows the change in class revenue percentage required to achieve equalized rates of return. This study indicates that in order to equalize class rates of return, the residential class would require a 0.27% revenue neutral reduction under the "average and 4CP" method or a 3.42% increase under the "average & excess 4NCP" method. To equalize class rates of return, the SGS class would require a 2.35% revenue neutral reduction under the "average & 4CP" method or a 0.33% revenue neutral increase under the "average and excess 4NCP" method. According to both versions of the CCOS study, the LGS/SPS class would need to be reduced, the LPS class would need to be increased, the LTS class would need to be increased, and the lighting class would need to be reduced.

Q. What is the relative importance of the CCOS results in developing rate design?

A. The results provide the Commission with a general rule in setting the just and reasonable rate for the provision of service based on costs. In addition, other factors are also relevant considerations when setting rates including the value of a service, affordability, rate impact, rate continuity, and rate shock.

Q. Based on OPC's CCOS study results, what is your recommendation regarding revenue neutral shifts?

A. OPC's CCOS study shows that both the residential and small general service classes are near the system average and should not receive a revenue neutral rate increase.

Q. Does this conclude your testimony?

A. Yes, it does.

Economic Development Tariff

State	Company	Discount	Qualifications
IA	Amana Society Service Co[3]	NA	NA
IA	Interstate Power and Light Co	Floor price is equal to energy and customer costs for that specific customer. Contracts negotiated on case by case basis.	May offer discounts to individuals, groups, or entire class of customers. All directly competing customers in similar situations will also be offered the same rate, cost-benefit analysis must be performed to determine if discount will be beneficial
IA	MidAmerica Energy Co	NA	NA
IL	Ameren Illinois Company	NA	NA
IL	Commonwealth Edison Co	NA	NA
IL	MidAmerican Energy Co	NA	NA
IL	Mt. Carmel Public Utility	NA	NA
IN	Duke Energy Indiana Inc	4 year term, discount put on total bill for new load: Year 1: 20%; Year 2: 15%, Year 3: 10%, Year 4: 5%	Must meet one of the following: additional workforce of 10+ FTEs and capital investment of $1 Mil per 1,000 kW new demand; New load results in $8 Mil per 1,000 kW new demand; additional workforce of 25+ FTEs. If customer ceases operation in 10 years following service agreement, customer must repay between 100%-10% of discount provided. Min Load: 1,000 kW; Max Load: 25,000 kW
IN	Indiana Michigan Power Co	Qualifying incremental demand discounted by an adjustment factor: New Dev = 30%, Urban Redev = 35% Brownfield = 40%	Billing demand must increase by 1,000 kVA or more Only offered to certain lines of business Must result in creation of 10+ FTEs Must prove absent discount, business would be located outside of territory. First come, first serve till 250 MVA aggregated
IN	Indianapolis Power & Light Co	NA	NA
IN	Northern Indiana Public Service Co	Base Load (preceding 12 months) not discounted. Additional electricity discounted: 5 year contract either 50%, 40%, 30%, etc, or 30% flat discount.	Creation of at least 10 FTEs 100 kW in new electrical demand Documentation that without tariff, company would locate elsewhere
IN	Southern Indiana Gas & Electric Co	Level 1: $2.25 per kVA/kW Level 2: $4.50 per kVA/kW Both applicable for 2 years	Level 1: Load factor 50%+, load addition of 500 kVA/kW+, 25 FTEs, must meet all criteria Level 2: Load factor 65%+, load addition of 1,500 kVA/kW+, 100 FTEs, capital investment of $1 Mil+, must meet 2 of 4
KS	Empire District Electric Co	NA	NA
KS	Kansas City Power & Light Co	5 year contract, reduction of otherwise applicable rate charges: Year 1: 30%; Year 2: 25%, Year 3: 20%; Year 4: 15%; Year 5: 10%. Discount only applied to new load	Available only in conjunction with other economic development activities, Annual load factor must equal or exceed Company's system load factor within 2 years, or Company may consider FTEs created, capital investment, interruptible load, and competition with existing industrial customers if load criteria not met. Must have peak demand of at least 200 kW
KS	Kansas Gas & Electric Co[4]	NA	NA
KS	Westar Energy Inc	Net monthly bill discount between 5%-25% declining by 20% over 5 year contract term.	New load requirement of 200 kW+ Company cannot sell goods directly to public
MI	Alpena Power Co	NA	NA
MI	Consumers Energy Co	Usage must exceed 5,850,000 kWh of base $0.049114/kWh, 50% fixed, 50% annually adjusted by annual average variable cost % change, capped at 8%	Rate closed for new business in 2011, but applicable for 10 years 70,200,000 kWh over 12 months

MI	Indiana Michigan Power Co	3 year term, incremental demand discounted by adjustment factor: New Dev = 15%, Redev = 17.5% Brownfield = 20%	Billing demand of 250 kW+ Limited principle business types Must prove without rider, business would locate elsewhere First come, first served capped at 50 MW
MI	Northern States Power Co	NA	NA
MI	The DTE Electric Company	NA	NA
MI	Upper Peninsula Power Co	NA	NA
MI	Wisconsin Electric Power Co	NA	NA
MI	Wisconsin Public Service Corp	NA	NA
MN	Interstate Power and Light Co	NA	NA
MN	Minnesota Power Co	GS/LLP: minimum contract term of 5 years, discount off of full demand charge, Years 1-3: 20%; Year 4: 10%, Year 5: 0% LPADR: minimum contract term of 10 years, discount capped at first 10,000 kW, Years 1-5: 10%; Years 6-7: 5%; Years 8-10: 0%	GS/LLP: new or expanding manufacturing/wholesale customers between 1,000 kW and 10,000 kW in an Area Dev. Zone. LPADR: new or expanding manufacturing/wholesale customers between 1,000 kW and 10,000 kW in an Area Dev. Zone.
MN	Northern States Power Co	Qualified billing demand discounted 5 years: Years 1-3: 50% Year 4: 40% Year 5: 20%	Manufacturing or Wholesale trade in an area dev. Zone Qualify for other development incentives from local governments
MN	Northwestern Wisconsin Electric Co	NA	NA
MN	Otter Tail Power Co	NA	NA
MO	Empire District Electric Co	NA	NA
MO	KCP&L Greater Missouri Operations Co	5 year contract, reduction of otherwise applicable rate charges: Year 1: 30%; Year 2: 25%, Year 3: 20%; Year 4: 15%; Year 5: 10%. Discount only applied to new load	Limited to Industrial and Commercial customers not selling goods/services directly to the public. Annual load factor of 55% or higher, the creation of 100+ FTEs and capital investment of $5,000,000+. Peak demand must reasonably be projected as 200 kW within 2 years of service
MO	Kansas City Power & Light Co	5 year contract, reduction of otherwise applicable rate charges: Year 1: 30%; Year 2: 25%, Year 3: 20%; Year 4: 15%; Year 5: 10%. Discount only applied to new load	Only available in conjunction with other economic development activities, limited to Industrial and Commercial customers not selling goods/services directly to the public. Annual load factor of 55% or higher, the creation of 100+ FTEs and capital investment of $5,000,000+. Peak demand must reasonably be projected as 200 kW within 2 years of service
MO	Union Electric Co	Econ Dev: Individual contracts, max discount of 15%, Revenue must be greater than incremental cost of service. Econ Re-Dev: If relocation of distribution facilities necessary, 50% discount on net customer cost. Standard Tariff Discount: Individual contracts, max discount of 15%, Revenue must be greater than incremental cost of service.	Econ Dev: Only available in conjunction with other economic development activities, or if exit from service territory is imminent. Must have 55% load factor, monthly peak demand of 500+ kW, firms not selling goods directly to the public. Econ Re-Dev: Only available in conjunction with other economic development activitiesEstimated average monthly peak demand of 500 + kW, must fall in designated Re-Dev areas. Must have 55% load factor for standard tariff discount to apply.
ND	Montana-Dakota Utilities Co	NA	NA
ND	Northern States Power Co	Rate reductions will be individually negotiated, 5 year contracts: minimum charges of 1.7 cents/kWh non-Time of Day, Time of Day = 1.95 cents/kWh and 1.47 cents/kWh Discount decreases over contract: Years 1-3: full discount Year 4: 75% of discount Year 5: 50% of discount	Closed Rider: new demand of at least 50 kW, or additional use for existing customer of 188 MWh Must qualify for PACE loan funding

ND	Otter Tail Power Co	Discount of .025 cents/kWh	Economic Dev. Cost Removal Rider: All electric service under Company's retail rate schedules
OH	Cleveland Electric Illuminating Co[1]	Offers a credit per KWh that varies by customer class. For Ex) Residential customers discounted in the winter above 500 kWhs, Schools pay 8.69% less, and Automakers are discounted on everything exceeding baseline usage	Must fall into rate class to qualify. Possible reaction to recession? Rider started in 2008, and included Residential, most Econ Dev. Tariffs focus on Industrials.
OH	Dayton Power & Light Co	Additional charge on a per kWh basis that varies by customer class	Recovery of costs incurred as a result of economic development and job retention programs, includes foregone revenue, specifically for reasonable arrangements the Company entered into with 2 large Industrial Customers.
OH	Duke Energy Ohio Inc	up to 50% of Distribution Demand Charge for 2 years	New load must be a minimum of 1,000 kW at one delivery point. Must employ workforce of 25 FTEs or larger New load results in $1 million of customer capital investment at customer facility Can also be applied to existing customer's who would otherwise leave
OH	Ohio Edison Co[1]	Offers a credit per KWh that varies by customer class. For Ex) Residential customers discounted in the winter above 500 kWhs, Schools pay 8.69% less, and Automakers are discounted on everything exceeding baseline usage	Must fall into rate class to qualify. Possible reaction to recession? Rider started in 2008, and included Residential, most Econ Dev. Tariffs focus on Industrials.
OH	Ohio Power Co	All customer bills subject to this rider will be charged an additional 11.44664% of the distribution charges.	No Qualifications listed outside of "all customer bills subject to the provisions of this Rider". An order from the Ohio Public Utilities Commission shows that the increased rate is used to offset cost under recoveries associated with "reasonable arrangements" for 4 Industrial customers
OH	The Toledo Edison Co[1]	Offers a credit per KWh that varies by customer class. For Ex) Residential customers discounted in the winter above 500 kWhs, Schools pay 8.69% less, and Automakers are discounted on everything exceeding baseline usage	Must fall into rate class to qualify. Possible reaction to recession? Rider started in 2008, and included Residential, most Econ Dev. Tariffs focus on Industrials.
SD	Black Hills Power Inc	Individually negotiated contracts, 3-7 years, discount will not price electricity below marginal cost	Business Development Service Rider: Customer displays intent to acquire electric service elsewhere, minimum contract demand of 250KVA.
SD	MidAmerican Energy Co	NA	NA
SD	Montana-Dakota Utilities Co	Discount negotiated individually based on energy charge. Ceiling price: 4.797 cents/KWh; Floor price: 2.874 cents/KWh. 5 year contract length, price increases 25% of difference from celing in 4th year, increased 50% of remaining difference in 5th year. Normal Large General Rate ranges from 6.262 cents/KWh to 4.467 cents/KWh depending on usage	Must have total new expected demand of 400 Kw and usage of 1.5 million KWh/year. Business must either be new or functionally different than previous business

SD	NorthWestern Energy Co[2]	Non-Demand Accounts: 20% discount excluding fuel cost for 2 years. Demand Accounts: 30% to standard demand charges for 5 years, additional discounts based on Achieved load factor and range from a 20% discount for 50% load factor to 50% discount, 80% load factor.	Minimum additional demand requirements of 5 KW+/month. 2 separate riders, a New Business Incentive Rider, and Increased Usage Incentive Rider. Only difference is Increased Usage Rider only offers discounts for Demand Accounts. Company explicitly states both Riders are being offered due to current Company Capacity.
SD	Northern States Power Co	NA	NA
SD	Otter Tail Power Co	NA	NA
WI	Consolidated Water Power Co	NA	NA
WI	Dahlberg Light & Power Co	NA	NA
WI	Madison Gas & Electric Co	NA	NA
WI	North Central Power Co Inc	NA	NA
WI	Northern States Power Co	NA	NA
WI	Northwestern Wisconsin Electric Co	NA	NA
WI	Pioneer Power and Light Co	NA	NA
WI	Superior Water and Light Co	NA	NA
WI	Westfield Electric Company	NA	NA
WI	Wisconsin Electric Power Co	NA	NA
WI	Wisconsin Power & Light Co	Up to 5 year contract, first year rate of 105% marginal cost for incremental load, discount declines at prorated reduction each year until customer rate is same as tariff.	Experimental Rider open to new or incremental load customers (Industrial). Customer must have received economic development assistance of $500,000+, not available if transferring load from another Wisconsin electric provider. Program limited to $5 million in discounts per year.
WI	Wisconsin Public Service Corp	NA	NA

[1] All companies owned by same parent corporation: First Energy
[2] Company operates as NorthWestern Public Service Co.
[3] Due to customer base, Company is not regulated by Iowa Utilities Board
[4] Formed Westar Energy after 1992 merger with KPL

Created by: JKM 12/15/2014

Iowa Utilities Board

Iowa's Electric Profile

The Iowa Utilities Board (IUB) has regulatory authority over investor-owned utility (IOU) rates and other service issues. IUB authority is mostly limited to service, safety, and engineering issues for the Municipal Electric (Muni) and Rural Electric Cooperative (REC) utilities in Iowa. The IUB has very limited authority for non-utility generators.

Electric Generation Profile: 2012 | 2011 | 2010 | 2009 | 2008 | 2007 | 2006

Wind-powered Electricity Generation in Iowa

Iowa Utility Electric Profile (2013)

Utility Type	# of Utilities	# of Customers	% Customers	MWh Sales[1]	% Sales
IOU	2	1,135,902	72.22%	34,804,143	74.49%
Muni	136	211,407	13.44%	5,346,595	11.44%
REC	44	225,624	14.34%	6,571,420	14.07%
Total	**182**	**1,724,933**	**100.00%**	**46,722,158**	**100.00%**

Note: (1) IOU, Muni, and REC totals exclude sales for resale. REC totals exclude sales to Generation & Transmission (G&T).
Amana Society Service Company is an investor-owned utility but it is not rate regulated due to the number of customers it serves. For this reason, it files its annual report information on Form EC-1 rather than Form IE-1. The information required in the Form IE-1 is more applicable to a rate-regulated utility.

Source: 2013 Annual Utility Reports (Form IE-1, Form EC-1, & Form ME-1).

Rider ECON – Economic Development Rate

Availability:
Electric utility companies may offer discounts to individual customers, to selected groups of customers, or to an entire class of customers. However, discounted rates must be offered to all directly competing customers in the same service territory. Customers are direct competitors if they make the same end product (or offer the same service) for the same group of customers. Customers that only produce component parts of the same end product are not directly competing customers.

In deciding whether to offer a specific discount, the utility shall evaluate the individual customer's, group's, or class's situation and perform a cost-benefit analysis before offering the discount.

Any discount offered should be such as to significantly affect the customer's or customers' decision to stay on the system or to increase consumption.

The consequences of offering the discount should be beneficial to all customers and to the utility. Other customers should not be at risk of loss as a result of these discounts; in addition, the offering of discounts shall in no way lead to subsidization of the discounted rates by other customers in the same or different classes.

All directly competing customers in a similar situation at the time the agreement is entered into with the qualifying customer would also be offered the same discounted rate to the extent they substantiate their status as a "directly competing customer". Customers are direct competitors if they make the same end product (or offer the same service) for the same general group of customers. Customers that only produce component parts of the same end product are not directly competing customers.

Terms and Conditions:
The Company may offer a special electric service contract with an economic development rate subject to the terms and conditions set forth in the Iowa Utilities Board rules and under the following minimum criteria:

a. A cost-benefit analysis must demonstrate that offering the discount will be more beneficial than not offering the discount.

b. The ceiling for all discounted rates shall be the approved rate on file for the customer's rate class.

c. The floor for the discount rate shall be equal to the energy costs and customer costs of serving the specific customer.

d. No discount shall be offered for a period longer than five years, unless the Iowa Utilities Board determines upon good cause shown that a longer period is warranted.

e. Discounts will not be offered if they will encourage deterioration in the load characteristics of the customer receiving the discount.

STANDARD CONTRACT RIDER NO. 58

ECONOMIC DEVELOPMENT RIDER

AVAILABILITY

Available, at the Company's option, to non-residential customers receiving service from the Company under Schedule HLF or LLF, provided that the customer is not classified as Retail Trade or Public Administration by the North American Industry Classification System (NAICS) Manual published by the United States Government. This Rider is available for new load associated with initial permanent service to new establishments or expansion of existing establishments who make application to the Company for service under this Rider and the Company approves such application. The new load applicable under this Rider must be a minimum of 1,000 kW demand at one delivery point. The maximum load to qualify for this Rider is 25,000 kW. Further, the customer must have applied for and received economic assistance from the State or local government or other public agency before the Company will approve a Service Agreement under this Rider. To qualify for service under this Rider, the customer must meet the qualifications as set forth under 1) or 2) or 3) below.

1) The customer must employ an additional workforce in the Company's service area of a minimum of ten (10) full-time equivalent (FTE) employees per 1,000 kW demand of new or expanded load and the new load must result in capital investment of one million dollars ($1,000,000) per 1,000 kW demand of new or expanded load . Employment additions and capital investment must occur following the Company's approval for service under this Rider; or

2) The customer's new load must result in capital investment of eight million dollars ($8,000,000) per 1,000 kW demand of new or expanded load. This capital investment must occur following the Company's approval for service under this Rider; or

3) The customer must employ an additional workforce in the Company's service area of a minimum of twenty-five (25) full-time equivalent (FTE) employees per 1,000 kW of demand of new or expanded load. Employment additions must occur following the Company's approval for service under this Rider.

This Rider is not available to a new customer which results from a change in ownership of an existing establishment without qualifying new load. However, if a change in ownership occurs after the customer enters into a Service Agreement for service under this Rider, the successor customer may be allowed to fulfill the balance of the Service Agreement under this Rider. This Rider is also not available for renewal of service following interruptions such as equipment failure, temporary plant shutdown, strike, or economic conditions. This Rider is not available for load shifted from one customer to another within the Company's service area.

CHARACTER OF SERVICE

The service provided shall be 60Hz alternating current provided at the Company's standard distribution or transmission voltage.

NET MONTHLY BILLING

The customer may request an effective date of the Rider which is no later than eighteen (18) months after the Service Agreement is approved and signed by the Company. The customer shall comply with all terms of the standard Rate HLF or Rate LLF under which the customer takes service except that a reduction based on the percentages below will be applied to the total bill for the New Load under this Rider, calculated on the applicable rate schedule, including the Connection Charge, Demand Charge, Energy Charge, kVAr Charge and applicable

Riders, but excluding Excess Facilities Charges. All subsequent billings shall be at the appropriate full standard service tariff rate.

Following the effective date of the Service Agreement, the customer must maintain a minimum demand in accordance with the Service Agreement and maintain 250 hours use of demand each month during the 48-month reduction period. Failure to do so will result in a 0% reduction for that month.

APPLICATION OF THE REDUCTION

Beginning with the effective date as declared by the customer, a reduction in the monthly bill will be applied to the total bill for the qualifying new load under this Rider.

Application of the Reduction:

Months 1-12	20%
Months 13-24	15%
Months 25-36	10%
Months 37-48	5%
After 48 months	0%

TERMS AND CONDITIONS

The customer must enter into a Service Agreement with the Company which shall specify, among other things, the voltage at which the customer will be served, a description of the amount and nature of the new load and the basis on which the customer requests qualification for this Rider. The Customer must agree to a minimum term of ten (10) years, with the reductions being available for a maximum period of four years immediately following the effective date. The customer must affirm that the availability of this Rider was a factor in the customer's decision to locate the new load in the Company's service area.

If the Customer ceases the operations for which Rider 58 was originally approved, the Company will require that the Customer repay the Rider 58 reductions received according to the following schedule:

Years 1 to 4, 100%
Year 5, 85%
Year 6, 70%
Year 7, 55%
Year 8, 40%
Year 9, 25%
Year 10, 10%

For customers entering into a Service Agreement under this Rider due to expansion, the Company may install, at customer's expense, metering equipment necessary to measure the new load to be billed under the provisions of this Rider separate from the customer's existing load which shall be billed under the applicable standard tariff schedule.

The Company is not obligated to extend, expand or rearrange its facilities if it determines that existing distribution/transmission facilities are of adequate capacity to serve the customer's load.

The maximum annual load to be added to the rider each year shall be 60,000 kW.

The supplying of, and billing for, service and all conditions applying thereto, are subject to the jurisdiction of the Indiana Utility Regulatory Commission, and to the Company's General Terms and Conditions currently in effect, as filed with the Indiana Utility Regulatory Commission.

ECONOMIC DEVELOPMENT RIDER

Availability of Service.

In order to encourage economic development in the Company's service area, limited-term reductions in billing demands described herein are offered to qualifying new and existing retail customers who make application for service under this Rider prior to January 1, 2015.

Service under this Rider is intended for specific types of commercial and industrial customers whose operations, by their nature, will promote sustained economic development based on plant and facilities investment and job creation. This Rider is available to commercial and industrial customers served under Tariff I.P. who meet the following requirements:

(1) A new customer must have a billing demand of 1,000 kVA or more. An existing customer must increase billing demand by 1,000 kVA or more over the maximum billing demand during the 12 months prior to the date of the application by the customer for service under this Rider (Base Maximum Billing Demand).

(2) In no event shall service under this Rider be available to a customer whose principal business at the service location is classified in one of the following SIC Major Groups:

01	02	07	08	09	15	16	17	50	51
52	53	54	55	56	57	58	59	64	

or in one of the following NAICS Major Groups:

11	21	22	23	42	44	45	48	53	71
72									

(3) A new customer, or the expansion by an existing customer, must result in the creation of at least 10 full-time equivalent jobs (FTE) maintained over the contract term at the service location. Company reserves the right to verify FTE job counts. Failure to maintain the minimum required FTE jobs will result in the termination of the contract or agreement addendum for service under this Rider.

(4) The customer must demonstrate to the Company's satisfaction that, absent the availability of this Rider, the qualifying new or increased demand would be located outside of the Company's service territory or would not be placed in service due to poor operating economics.

Availability is limited to customers on a first-come, first-served basis for loads aggregating 250 MVA.

Terms and Conditions.

(1) To receive service under this Rider, the customer shall make written application to the Company with sufficient information contained therein to determine the customer's eligibility for service.

(2) For new customers, billing demands for which deductions will be applicable under this Rider shall be for service at a new service location and not merely the result of a change of ownership. Relocation of the

(Cont'd on Sheet No. 32.1)

ECONOMIC DEVELOPMENT RIDER

(Cont'd from Sheet No. 32)

delivery point of the Company's service does not qualify as a new service location.

(3) For existing customers, billing demands for which deductions will be applicable under this Rider shall be the result of an increase in business activity and not merely the result of resumption of normal operations following a force majeure, strike, equipment failure, renovation or refurbishment, or other such abnormal operating condition. In the event that such an occurrence has taken place during the 12-month period prior to the date of the application by the customer for service under this Rider, the monthly billing demands during the 12-month period shall be adjusted as appropriate to eliminate the effects of such occurrence.

(4) All demand adjustments offered under this Rider shall terminate no later than December 31, 2018.

(5) The existing local facilities of the Company must be deemed adequate, in the judgment of the Company, to supply the new or expanded electrical capacity requirements of the customer. If construction of new or expanded local facilities by the Company are required, the customer may be required to make a contribution-in-aid of construction for the installed cost of such facilities pursuant to the provisions of Item No. 14 of the Company's Terms and Conditions of Service.

Determination of Monthly Adjusted Billing Demand.

The qualifying incremental billing demand shall be determined as the amount by which the billing demand, as determined according to Tariff I.P. for the current billing period without this Rider, exceeds the Base Maximum Billing Demand. Such incremental billing demand shall be considered to be zero, however, unless it is at least 1,000 kVA for new customers or existing customers.

The monthly adjusted billing demand under this Rider shall be the billing demand as determined according to Tariff I.P. for the current billing period without this Rider less the product of the qualifying incremental billing demand and the applicable Adjustment Factor.

No Adjustment Factors shall be applied to any portion of minimum billing demands as calculated under Tariff I.P.

Determination of Adjustment Factor.

Standard New Development Customers – customers meeting all availability and terms and conditions above shall contract for service for a period of three (3) years with an Adjustment Factor of thirty percent (30%).

Urban Redevelopment Customers – customers meeting all availability and terms and conditions above, and that (1) are locating a new business in an existing building that has been unoccupied and/or has remained dormant for at least one or more years and has no current or prior relationship with the previous occupant, as determined by the Company, and (2) taking delivery at one point that does not require significant distribution or transmission system investment, other than the connection of service, shall contract for service for a period of three (3) years with an Adjustment Factor of thirty-five percent (35%).

(Cont'd on Sheet No. 32.2)

ECONOMIC DEVELOPMENT RIDER

(Cont'd from Sheet No. 32.1)

Brownfield Redevelopment Customers – customers meeting all availability and terms and conditions above, and that (1) are locating a new business in qualifying Brownfield redevelopment areas, as defined under Indiana or Federal law, (2) are served by existing I&M service lines, and (3) are locating in an existing building that has been unoccupied for at least one year and has no current or prior relationship with the previous occupant, as determined by the Company, shall contract for service for a period of three (3) years with an Adjustment Factor of forty percent (40%).

The appropriate adjustment factor shall be applicable over a period of 36 consecutive billing months beginning with the first such month following the end of the start-up period. The start-up period shall commence with the effective date of the contract addendum for service under this Rider and shall terminate by mutual agreement between the Company and the customer.

In no event shall the start-up period exceed 12 months.

Terms of Contract.

A contract or agreement addendum for service under this Rider, in addition to service under Tariff I.P., shall be executed by the customer and the Company for the time period which includes the start-up period and the three-year period immediately following the end of the start-up period. The contract addendum shall specify the Base Maximum Billing Demand, the anticipated total demand, the Adjustment Factor and related provisions to be applicable under this Rider, and the effective date for the contract addendum.

The customer may discontinue service under this Rider before the end of the contract or agreement addendum only by reimbursing the Company for any demand adjustments received under this Rider billed at the applicable rate.

Special Terms and Conditions.

Except as otherwise provided in this Rider, written agreements shall remain subject to all of the provisions of Tariff I.P. This Rider is subject to the Company's Terms and Conditions of Service.

RIDER 677
ECONOMIC DEVELOPMENT RIDER

TO WHOM AVAILABLE

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

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

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

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

CONTRACT

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

RATE

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

RIDER 677
ECONOMIC DEVELOPMENT RIDER

RATE (continued)

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

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

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

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

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

ELIGIBILITY THRESHOLDS

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

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

RIDER 677
ECONOMIC DEVELOPMENT RIDER

QUALIFYING CRITERIA

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

Economic and/or Environmental Distress

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

Power Use Characteristics

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

Site Specific Discounts

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

Number of Jobs Created

Full-time equivalent job creation per project.

RIDER ED
ECONOMIC DEVELOPMENT RIDER

AVAILABILITY

This Rider shall be available throughout Company's Service Area, subject to the availability of adequate facilities and supplies, which determinations shall be within Company's reasonable discretion.

APPLICABILITY

The Economic Development Rider shall be applicable to any new Non-Residential Customer who establishes initial permanent service in a new or existing establishment, and to any existing Non-Residential Customer who expands an existing establishment, who:

1. Receives service under Rate DGS, LP, or HLF,
2. Makes application to Company for service under this Rider,
3. Has applied for and received economic development assistance from State or local government or other public agency,
4. Affirms that without this Rider, it would not be financially advantageous for Customer to expand the existing or build the proposed new establishment.

Customers meeting all Applicability criteria above are eligible for incentives under the Rider at two levels:

Level 1 Incentives – Customer's new electric load addition must meet all of the following minimum criteria:

1. Expected monthly load factor of 50% or higher
2. Expected load addition of 500 kVa/kW per month or more per month at one delivery point.
3. Result in the creation of 25 new full-time equivalent jobs at the same location.

Level 2 Incentives – Customer's new electric load must meet 2 out of 4 of the following minimum criteria:

1. Expected monthly load factor of 65%, or higher.
2. Expected load addition of 1500 kVa/kW per month or more at one delivery point.
3. Result in the creation of 100 new full-time equivalent jobs at the same location.
4. Result in capital investment at Customer's establishment of one million dollars ($1,000,000) or more for each 1000 kVa/kW per month of new load.

Company may also apply this Rider to an existing customer who, but for economic incentives being provided from the State and/or local government or public agency, would leave or not expand facilities within Company's service area. In this event, Customer must agree, at a minimum, to retain the current number of full-time equivalent jobs at the existing location.

For new Customers, application for service hereunder must be made at the time of initial application for electric service.

Effective: May 3, 2011

RIDER ED
ECONOMIC DEVELOPMENT RIDER
(Continued)

This Rider is not available:

1. To a Customer who is a "new" Customer as a result of a change in ownership of an existing establishment, unless the prior owner was a customer hereunder or the ownership change is accompanied by State, local governmental or other public agency economic assistance.
2. To a new Customer who has relocated to Company's Service Area from another location within the State.
3. For renewal of service following service interruptions related to, but not limited to, equipment failure, temporary plant shutdown, work stoppage, or economic conditions.

EVIDENCE OF CONTINUING APPLICABILITY

Customer shall make available to Company, at its reasonable request, evidence of full-time employment levels and capital investments used as the basis for applicability for receiving service hereunder.

RATES AND CHARGES

Customer receiving service under this Rider:

1. Shall receive a credit to the Monthly Billing Demand Charge due per month under the applicable tariff rate schedule for a period of twenty-four (24) consecutive months, as follows:
   a. for all Level 1 demand additions, the credit is $2.25 per kVA/kW.
   b. for all Level 2 demand additions, the credit is $4.50 per kVA/kW.

   The monthly base period demand shall be specified in the contract and will be the average of the Maximum Demands during the 12 months preceding the new demand addition or parts thereof. Any demand served greater than the monthly base period demand will be considered new demand additions and shall qualify for the credit.
2. Shall designate the date on which the Billing Demand credits shall commence, said date not to be later than twelve (12) months after Company's approval of Customer's application.
3. Shall continue to be billed the full amount of all other Monthly Rates and Charges applicable to Customer's applicable Rate Schedule.
4. Shall resume being billed the full Monthly Rates and Charges under Customer's applicable Rate Schedule after receiving service under this Rider for twenty-four (24) months.

Effective: May 3, 2011

RIDER ED
ECONOMIC DEVELOPMENT RIDER
(Continued)

CONTRACT

Upon approval of application by Company, Customer must enter into a Contract under this Rider for a contract period of six (6) years. Employment additions must occur no later than six months following Company's approval of the Contract and initiation of service hereunder.
The Contract shall also include such other terms and conditions which Company determines in its reasonable discretion to be necessary or advisable in connection with offering service under this Rider, including, but not limited to, the requirement for Customer to pay to Company the difference between the total charges under this Rider and the otherwise applicable Rate Schedule charges if during the term of the Contract Customer fails to meet the employment additions and retentions specified at the beginning of the service relationship.

Establishments for which a change in ownership occurs after Customer enters into a Contract under this Rider shall continue to receive service hereunder for the balance of the term of the Contract, as long as all other conditions of the Contract and this Rider are upheld by Customer.

Company reserves the right to immediately terminate service under this Rider, if Company determines that Customer has failed to comply with the terms of the APPLICABILITY section, or this Contract, at any time during the term of the Contract.

EXPIRATION

This Rider shall expire on December 31, 2015. Customers making application for service hereunder prior to this date shall be eligible for the full twenty-four (24) months of Billing Demand credit described herein.

Effective: May 3, 2011

Form RF

Index No......................

THE STATE CORPORATION COMMISSION OF KANSAS

KANSAS CITY POWER & LIGHT COMPANY
(Name of Issuing Utility)

SCHEDULE ...75...

Replacing Schedule......75......Sheet....1.....

Rate Areas No. 2 & 4
(Territory to which schedule is applicable)

which was filed December 23, 1991

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet ...1... of ...4... Sheets

ECONOMIC DEVELOPMENT RIDER
Schedule EDR

PURPOSE:

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

AVAILABILITY:

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

The availability of this Rider shall be limited to industrial and commercial facilities not involved in selling or providing goods and services directly to the general public. Customers receiving service under this Rider must qualify under the criteria of this Rider or have been served under the superseded Rider on December 31, 1991.

APPLICABILITY:

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

KCPL Form 661H001 (Rev 8/97)

98KCPE500T AR
Commission File Number

Issued November 12, 1998
Month Day Year

Effective For Bills Rendered On or After March 1, 1999.
Month Day Year

By J. S. Latz, Senior Vice President
Signature of Officer, Title

NOTED & FILED DEC 21 1998

THE STATE CORPORATION COMMISSION OF KANSAS

By ....
Secretary

Attachment GM-2
18/118

Form RF

Index No. ....

THE STATE CORPORATION COMMISSION OF KANSAS

KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

SCHEDULE 75

Replacing Schedule 75 Sheet 2

which was filed July 20, 1988

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet 2 of 4 Sheets

ECONOMIC DEVELOPMENT RIDER
Schedule EDR (continued)

APPLICABILITY (con't).

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

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

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

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

a. Number of new permanent full-time jobs created or the percentage increase in existing permanent full-time jobs;
b. Capital investment;
c. Additional off-peak usage;
d. Curtailable/interruptible load;
e. New industry or technology;
f. Competition with existing industrial Customers.

2) The peak demand of the new or additional facility is reasonably projected to be at least two-hundred (200) kW within two years of the date the Customer first receives service under this Rider.

92KCPE071TAR
Commission File Number

KCPL Form 661H001 (Rev 4/88)

Issued September 10, 1991
Month Day Year

Effective January 1, 1992
Month Day Year

By B. J. Beaudoin, Vice President
Signature of Officer, Title

NOTED & FILED DEC 23 1991

THE STATE CORPORATION COMMISSION OF KANSAS

By Judith McConnell
Secretary

Form RF

Index No......................

THE STATE CORPORATION COMMISSION OF KANSAS

KANSAS CITY POWER & LIGHT COMPANY
(Name of Issuing Utility)

SCHEDULE ....75........

Replacing Schedule........75................Sheet..3........

.....Rate Areas No. 2 & 4...
(Territory to which schedule is applicable)

which was filed December 23, 1991

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet ...3........ of ....4....... Sheets

ECONOMIC DEVELOPMENT RIDER
Schedule EDR (continued)

APPLICABILITY: (con't.)

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

INCENTIVE PROVISIONS:

1. Revenue Determination: The pre-tax revenues under this Rider shall be determined by reducing otherwise applicable charges, associated with the SGS, MGS, LGS, LPS, SGA, MGA, or LGA rate schedules, by 30% during the first contract year, 25% during the second contract year, 20% during the third contract year, 15% during the fourth contract year and 10% during the fifth contract year. After the fifth contract year, this incentive provision shall cease. All other billing, operational and related provisions of the aforementioned rate schedules shall remain in effect.

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

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

3. Local Service Facilities: The Company will not require a contribution in aid of construction for standard facilities installed to serve the Customer if the expected revenues from the new load are determined to be sufficient to justify the required investment in the facilities.

98KCPE500T AR
Commission File Number

Issued November 12, 1998 (Month Day Year)	NOTED & FILED DEC 21 1998
Effective For Bills Rendered On or After March 1, 1999 (Month Day Year)	THE STATE CORPORATION COMMISSION OF KANSAS
By J. S. Latz, Senior Vice President (Signature of Officer, Title)	By Secretary

KCPL Form 681H001 (Rev 6/97)

Attachment GM-2
20/118

Form RF

Index No. ....

THE STATE CORPORATION COMMISSION OF KANSAS

KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

SCHEDULE 75

Replacing Schedule .... Sheet ....

which was filed ....

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet 4 of 4 Sheets

ECONOMIC DEVELOPMENT RIDER
Schedule EDR (continued)

TERMINATION

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

KCPL Form 661H001 (Rev 4/88)

92KCPE071TAR

Commission File Number

Issued September 10, 1991 (Month Day Year)	NOTED & FILED DEC 23 1991
Effective January 1, 1992 (Month Day Year)	THE STATE CORPORATION COMMISSION OF KANSAS
By B. J. Beaudoin, Vice President (Signature of Officer, Title)	By Judith McConnell, Secretary

Attachment GM-2
21/118

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THE STATE CORPORATION COMMISSION OF KANSAS

WESTAR ENERGY, INC & KANSAS GAS & ELECTRIC COMPANY, d.b.a. WESTAR ENERGY

(Name of Issuing Utility)

WESTAR RATE AREA

(Territory to which schedule is applicable)

SCHEDULE EDR

Replacing Schedule EDR Sheet 1

which was filed April 18, 2012

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet 1 of 4 Sheets

ECONOMIC DEVELOPMENT RIDER

PURPOSE

The purpose of this Economic Development Rider is to encourage industrial and commercial development in Kansas. These activities will attract capital expenditures to the State, diversify the Company's customer base and create jobs.

AVAILABLE

Electric service under this rider is available to certain customers otherwise qualified for the Company's standard rate schedules - Medium General Service (MGS); or High Load Factor (HLF) and as more fully set forth herein.

The availability of this rider shall be limited to industrial and commercial customers not selling or providing goods and service directly to the general public and determined necessary by the Company for the customer to locate or expand its facility.

APPLICABLE

Upon the application by a qualified customer and acceptance by the Company, the provisions of this rider are applicable to new industrial and commercial customers having load requirements greater than 200 kW and to the facilities of existing industrial and commercial customers whose expanded operations have increased its load requirements greater than 200 kW at existing locations. Electric service under this rider is contingent on a customer increasing the number of permanent employees at customer's facility. This Rider is further contingent on a customer receiving economic development incentives from a City, County, Regional or State Economic Development group.

Issued ____________
Month Day Year

Effective December 17 2013
Month Day Year

By ____________
Jeffrey L. Martin, Vice President

14-WSEE-147-TAR
Approved
Kansas Corporation Commission
December 17, 2013
/S/ Kim Christiansen

ECONOMIC DEVELOPMENT RIDER

INCENTIVE PROVISIONS

1. New qualified customers' net monthly bills shall be calculated, prior to taxes, under the MGS or HLF rate schedule and discounted as follows:

   A: An incentive credit of 5% to 25% discount declining at 20 percent per year for five years; or

   B: Company and customer may mutually agree to an incentive time period different than five years, provided the total nominal value of the discount is not greater than the total nominal value of the maximum discount allowed under option A (i.e. 25% over 5 years).

2. Existing qualified customers' net monthly bills shall be calculated, prior to taxes, under the MGS or HLF rate schedule and discounted by the Incentive Provisions in 1 above. The Incentive Provisions shall apply to existing customers' net monthly bill, calculated prior to taxes for the twelve billing months usage prior to an expansion, and provided that customer's current month's Billing Demand is 200 kW greater than the highest Billing Demand established during the twelve billing months prior to taking service under this rider.

Issued ____________
Month Day Year

Effective December 17 2013
Month Day Year

By [signature]
Jeffrey L. Martin, Vice President

14-WSEE-147-TAR
Approved
Kansas Corporation Commission
December 17, 2013
/S/ Kim Christiansen

THE STATE CORPORATION COMMISSION OF KANSAS

WESTAR ENERGY, INC & KANSAS GAS & ELECTRIC COMPANY, d.b.a. WESTAR ENERGY

(Name of Issuing Utility)

WESTAR RATE AREA

(Territory to which schedule is applicable)

SCHEDULE EDR

Replacing Schedule EDR Sheet 3

which was filed April 18, 2012

No supplement or separate understanding shall modify the tariff as shown hereon.

ECONOMIC DEVELOPMENT RIDER

3. Any customer taking service under this rider which initiates a subsequent qualified expansion may,

   a. include the load resulting from the subsequent expansion with the amount currently covered by this rider and discount the resultant total as the currently qualified load is discounted for the remaining life of the existing contract, or

   b. terminate the existing service agreement for the currently qualified load and initiate a new service agreement for the subsequent qualified expansion at an existing location as defined in 2 above, or

   c. establish a new account and separately meter the new load.

   A customer may have only one Economic Development Rider in effect at any time unless a separate account is established for the loads and the loads are separately metered.

4. All provisions set forth in customer's standard rate schedule apply to the extent they are not superseded by provisions contained in this rider.

OTHER PROVISIONS

1. Local Service Facilities: The Company may require a contribution in aid of construction for standard facilities installed to serve the customer if the Company's analysis of expected revenues from the new load do not provide a fair retum on the investment.

2. Company's Discretion: It is solely within the discretion of Company to determine if a customer meets the criteria for receiving service under this rider. Company may withdraw this rider if it determines the requirements of the rider are not being met.

Issued ____________________
Month Day Year

Effective December 17 2013
Month Day Year

By [signature]
Jeffrey L. Martin, Vice President

14-WSEE-147-TAR
Approved
Kansas Corporation Commission
December 17, 2013
/S/ Kim Christiansen

Attachment GM-2

Index ____________

THE STATE CORPORATION COMMISSION OF KANSAS

WESTAR ENERGY, INC & KANSAS GAS & ELECTRIC COMPANY, d.b.a. WESTAR ENERGY

(Name of Issuing Utility)

WESTAR RATE AREA

(Territory to which schedule is applicable)

SCHEDULE EDR

Replacing Schedule EDR Sheet 4

which was filed April 18, 2012

No supplement or separate understanding shall modify the tariff as shown hereon.

ECONOMIC DEVELOPMENT RIDER

3. The Company may freeze the availability of this rider with respect to new loads at any time. Any customer receiving service under the rider on the date it is frozen or modified may continue to receive the benefits of the incentive provisions as contained in the rider effective the date customer first took service under this rider through the first five years of such customer's contract.

4. Service under this rider is subject to the Company's General Terms and Conditions presently on file with the State Corporation Commission of Kansas and any modifications subsequently approved.

5. All provisions of this rider are subject to changes made by order of the regulatory authority having jurisdiction.

Issued ____________
Month Day Year

Effective December 17 2013
Month Day Year

By ____________
Jeffrey L. Martin, Vice President

14-WSEE-147-TAR
Approved
Kansas Corporation Commission
December 17, 2013
/S/ Kim Christiansen

GENERAL SERVICE LARGE INDUSTRIAL ECONOMIC DEVELOPMENT PRIMARY RATE E-1

This Rate Is Not Open to New Business

Availability:

This rate is available to any qualifying industrial customer who certifies that it reasonably expects to experience an increase in connected load at its single premises (i.e., an undivided piece of land that is not separated by public roads, streets or alleys) of at least 70,200,000 kWh over 12 consecutive months. This rate will only apply to the customer's new load, as defined herein. In order to maintain eligibility for this rate, the customer must maintain an annual load factor of at least seventy percent (70%) for the new load, calculated based on the average of the monthly load factors for the new load for the previous 12 months under this tariff. In the event that the customer elects not to have the new load separately metered, the load factor calculation will be calculated based on the average of the monthly load factors for the previous twelve months for the entire premises.

A customer taking service under this Rate Schedule must certify that the load to be served under this rate is new load, was not served prior to November 22, 2005, and does not result from business closure, sale or relocation of work from another facility in Michigan or existing customer load otherwise served by alternative sources of generation. The Company is not obligated to independently investigate or substantiate the customer's claims in the customer's certification.

This rate becomes effective with the first full calendar month following the date of the Commission Order approving this rate and remains in effect for ten years from the effective date of Rate E-1. Commencing with the third year following the effective date of Rate E-1, Rate E-1 will be closed to new business. A customer who takes service under this rate within the first two years that the rate is open for business shall remain eligible for service under this rate as long as Rate E-1 is in effect.

Nature of Service:

Service under this rate shall be alternating current 60-Hertz, single-phase or three-phase. The Company and the customer will jointly determine the particular nature of the voltage necessary to serve the customer in each case.

For purposes of this Rate E-1, "new load" means incremental kWh as described above, which shall be measured either by separate metering or, at the customer's option, by establishing a Kilowatt-hour base as described herein. The customer may choose to have the new load separately metered. The customer shall bear any expense incurred by the Company in providing a separate meter for the incremental portion of an existing customer's load. The customer must provide space suitable for the separate metering.

If the customer elects not to have the new load separately metered, a monthly Kilowatt-hour base shall be established at the customer's average monthly energy usage during the 12 full months preceding the month in which the Commission issues its order approving this rate. The customer shall be billed monthly under Rate E-1 for the Kilowatt-hours used in excess of the established Kilowatt-hour base if either (a) the customer's actual energy usage during that month is at least 5,850,000 kWh above the Kilowatt-hour base, or (b) the customer's average monthly energy usage, calculated as of the end of the 12 consecutive months of the current contract year, is at least 5,850,000 kWh above the Kilowatt-hour base.

A customer who contracts for service under this rate will be required to select their otherwise applicable rate for billing purposes in the event that, in a given billing month, the customer does not qualify for the monthly rate specified in this Rate E-1. Notwithstanding any provisions to the contrary, a customer who contracts for service under this Rate E-1 shall have the option to elect any other rate to serve its existing load, including but not limited to Retail Open Access.

(Continued on Sheet No. D-39.00)

GENERAL SERVICE LARGE INDUSTRIAL ECONOMIC DEVELOPMENT PRIMARY RATE E-1

(Continued From Sheet No. D-38.00)

Nature of Service: (Contd)

The first contract year of service under this rate will commence the first month that the total new load usage is at least 5,850,000 kWh. At the end of each 12-month contract year, a review of the total new load usage will be made. If the total annual new load usage is at least 70,200,000 kWh, then the entire new load usage will remain billed at the rate specified in this tariff. If the total annual new load usage is less than 70,200,000 kWh, then each individual month's usage will be reviewed. Usage in months in which new load usage was at least 5,850,000 kWh will be billed at the rate specified in this tariff. Usage in months in which new load usage is less than 5,850,000 kWh will be billed at the otherwise applicable rate. Such a billing, if necessary, will not impact any billing for the customer's pre-existing load and will not be subject to demand ratchet mechanisms. All demand and energy associated with a customer's new load served under this Rate E-1 shall be excluded from the calculation of charges and billing determinants for the customer's existing load.

Monthly Rate:

$*0.049114* per kWh, inclusive of surcharges, PSCR factors, and other charges of any kind, except as expressly provided herein, for all kWh of new load used.

Fifty percent (50%) of the initial $0.04200 per kWh rate will remain fixed over the period this tariff applies. Beginning in Year 2009, the remaining fifty percent (50%) will be adjusted annually by the percentage change in the Company's annual average variable energy cost determined on a $/kWh basis (fuel for generation, plus purchased power costs less capacity and fixed energy costs, divided by total system sales) as determined in the annual Power Supply Cost Recovery reconciliation filing. The initial adjustment in Year 2009 will be based on the percentage change, in cost per kWh, from the average of Years 2005 and 2006 compared to Year 2008. Subsequent adjustments will be computed annually using the prior two years' data.

Any increase in the variable portion of the monthly rate resulting from the annual adjustment mechanism in Years 2009, 2010 and 2011 will be no more than eight percent (8%). In Year 2012 and beyond, any increase in the variable portion of the monthly rate resulting from the annual adjustment mechanism will be limited to four percent (4%) per year and any decrease will be limited to two percent (2%) per year. To the extent the percentage change exceeds the annual percentage change limitation, the difference will be carried over and applied to future years adjustments. The percentage changes that may be carried over have no monetary value and no payments shall be made between the Company and the Customer when the Customer ceases taking service under this tariff. Specific calculation methodology will be included in the Rate E-1 contract executed between the Company and the customer.

General Terms:

This rate is subject to all general terms and conditions shown on Sheet No. D-1.00.

(Continued on Sheet No. D-40.00)

GENERAL SERVICE LARGE INDUSTRIAL ECONOMIC DEVELOPMENT PRIMARY RATE E-1

(Continued From Sheet No. D-39.00)

Monthly Rate: (Contd)

Adjustment for Power Factor:

This rate requires a determination of the average Power Factor maintained by the customer during the billing period. Such average Power Factor shall be determined through metering of lagging Kilovar-hours and Kilowatt-hours during the billing period. The calculated ratio of lagging Kilovar-hours to Kilowatt-hours shall then be converted to the average Power Factor for the billing period by using the appropriate conversion factor. Whenever the average Power Factor during the billing period is above .899 or below .800, the monthly bill shall be adjusted as follows:

(a) If the average Power Factor during the billing period is 0.900 or higher, the Rate E-1 monthly bill shall be reduced by the product of one-half of the monthly rate, times a two percent (2%) credit, times eighty-five percent (85%) of the Kilowatt-hours used under Rate E-1 during said period.

(b) If the average Power Factor during the billing period is less than 0.800, the monthly bill shall be increased by the product of one-half of the monthly rate, times the ratio that 0.800 bears to the customer's average Power Factor during the billing period minus one, times eighty-five percent (85%) of the Kilowatt-hours used during said period.

In the event that the customer elects not to have the new load separately metered, the Power Factor will be the customer's premises' Power Factor.

Due Date and Late Payment Charge:

The due date of the customer's bill shall be 21 days from the date of mailing. A late payment charge of 2% of the unpaid balance, net of taxes, shall be assessed to any bill which is not paid on or before the due date shown thereon.

Term and Form of Contract:

All service under this rate shall require a written contract with a minimum term of one year and shall provide the customer with annual renewal options not to extend beyond the expiration date of this Rate E-1.

Upon expiration of the minimum term, and from month to month thereafter, the customer may, with respect to its new load, elect to continue service under this rate, or take service under a different rate, or discontinue service, or elect to take Retail Open Access Service. There will be no financial or other penalties for a customer making any such election.

ECONOMIC DEVELOPMENT RIDER
To Tariffs MGS, LGS and LP

Availability of Service

T

In order to encourage economic development in the Company's service area, limited-term reductions in billing demands described herein are offered to qualifying new and existing Standard Service retail customers who make application for service under this Rider prior to January 1, 2013.

Service under this Rider is intended for specific types of commercial and industrial customers whose operations, by their nature, will promote sustained economic development based on plant and facilities investment. This Rider is available to commercial and industrial customers served under Tariff MGS, LGS, or LP who meet the following requirements:

(1) A new customer must have a billing demand of 250 kW or more. An existing customer must increase billing demand by 250 kW or more over the maximum billing demand during the 12 months prior to the date of the application by the customer for service under this Rider (Base Maximum Billing Demand).

In no event shall service under this Rider be available to a customer whose principal business at the service location is classified in one of the following SIC Major Groups:

01	02	07	08	09	15	16	17	50	51
52	53	54	55	56	57	58	59	64	70

(2) The customer must demonstrate to the Company's satisfaction that, absent the availability of this Rider, the qualifying new or increased demand would be located outside of the Company's service territory or would not be placed in service due to poor operating economics. T

(Continued on Sheet No. D-89.00)

ECONOMIC DEVELOPMENT RIDER
To Tariffs MGS, LGS and LP

(Continued From Sheet No. D-88.00)

Availability is limited to customers on a first-come, first-served basis for loads aggregating 50 MW. T

Terms and Conditions

(1) To receive service under this Rider, the customer shall make written application to the Company with sufficient information contained therein to determine the customer's eligibility for service.

(2) For new customers, billing demands for which deductions will be applicable under this Rider shall be for service at a new service location and not merely the result of a change of ownership. Relocation of the delivery point of the Company's service does not qualify as a new service location.

(3) For existing customers, billing demands for which deductions will be applicable under this Rider shall be the result of an increase in business activity and not merely the result of resumption of normal operations following a force majeure, strike, equipment failure, renovation or refurbishment, or other such abnormal operating condition. In the event that such an occurrence has taken place during the 12-month period prior to the date of the application by the customer for service under this Rider, the monthly billing demands during the 12-month period shall be adjusted as appropriate to eliminate the effects of such occurrence.

(4) All demand adjustments offered under this Rider shall terminate no later than the November 2014 billing month.

(5) The existing local facilities of the Company must be deemed adequate, in the judgement of the Company, to supply the new or expanded electrical capacity requirements of the customer. If construction of new or expanded local facilities by the Company are required, the customer may be required to make a contribution-in-aid of construction for the installed cost of such facilities pursuant to the provisions of Item 12, B and/or 13, C of the Company's Terms and Conditions of Standard Service.

Determination of Monthly Adjusted Billing Demand

The qualifying incremental billing demand shall be determined as the amount by which the billing demand, as determined according to the applicable Tariff for the current billing period without this Rider, exceeds the Base Maximum Billing Demand. Such incremental billing demand shall be considered to be zero, however, unless it is at least 250 kW for new customers or existing customers.

The monthly adjusted billing demand under this Rider shall be the billing demand as determined according to the applicable Tariff for the current billing period without this Rider less the product of the qualifying incremental billing demand and the applicable Adjustment Factor.

No Adjustment Factor shall be applied to any portion of minimum billing demands as calculated under the applicable Tariff. T

(Continued on Sheet No. D-90.00)

ECONOMIC DEVELOPMENT RIDER
To Tariffs MGS, LGS and LP

(Continued From Sheet No. D-89.00)

Standard New Development of Expansion Customers – customers meeting all availability and terms and conditions above shall contract for service for a period of three (3) years with an Adjustment Factor of fifteen percent (15%). T

Redevelopment Customers – customers meeting all availability and terms and conditions above, and that (1) are locating a new business in an existing building that has been unoccupied for at least one year and has no current or prior relationship with the previous occupant, as determined by the Company, and (2) taking delivery at one point that does not require significant distribution or transmission system investment, other than the connection of service, shall contract for service for a period of three (3) years with an Adjustment Factor of seventeen and one-half percent (17 1/2%).

Brownfield Redevelopment Customers – customers meeting all availability and terms and conditions above, and that (10 are locating a new business in qualifying Brown field redevelopment areas, as defined under Michigan or Federal law, (2) are served by existing I&M service lines, and (3) are locating in an existing building that has been unoccupied for at least one year and has no current or prior relationship with the previous occupant, as determined by the Company, shall contract for service for a period of three (3) years with an Adjustment Factor of twenty percent (20%).

The appropriate adjustment factor shall be applicable over a period of 12 consecutive billing months beginning with the first such month following the end of the start-up period. The start-up period shall commence with the effective date of the contract addendum for service under this Rider and shall terminate by mutual agreement between the Company and the customer.

In no event shall the start-up period exceed 12 months.

T

(Continued on Sheet No. D-91.00)

ECONOMIC DEVELOPMENT RIDER
To Tariffs MGS, LGS and LP

(Continued From Sheet No. D-90.00)

Term of Contract T

A contract or agreement addendum for service under this Rider, in addition to service under the applicable Standard Service, shall be executed by the customer and the Company for the time period which includes the start-up period and the maximum three-year Adjustment Factor period immediately following the end of the start-up period. The contract addendum shall specify the Base Maximum Billing Demand, the anticipated total demand, the Adjustment Factor and related provisions to be applicable under this Rider, and the effective date for the contract addendum.

The customer may discontinue service under this Rider before the end of the term of the contract or agreement addendum only by reimbursing the Company for any demand adjustments received under this Rider billed at the applicable rate.

Special Terms and Conditions

Except as otherwise provided in this Rider, written agreements shall remain subject to all of the provisions of the applicable tariff. This Rider is subject to the Company's Terms and Conditions of Standard Service. T

AVAILABILITY

Available to new or existing demand metered customers located in Area Development Zones whose proper Standard Industrial Classification (SIC) is manufacturing or wholesale trade and who qualify for other development incentives offered by local government entities. The availability of this Rider is limited to specific Area Development Zones that meet the criteria listed below as set forth by the Commission.

ZONE DESIGNATION

Area Development Zones in the seven county Twin Cities' metropolitan area (Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington Counties) must be located within one of the cities lying within the "Fully Developed Area" as classified by the Metropolitan Council in the document entitled "Metropolitan Development and Investment Framework (December 1988)" that has experienced a decline in combined employment in manufacturing and wholesale trade between 1980 and the most recent year for which data are available as published by the Minnesota Department of Economic Security. Eligible communities are Bloomington, Columbia Heights/Hilltop, Crystal, Fridley, Golden Valley, Hopkins, Minneapolis, New Brighton, Roseville, South St. Paul, St. Louis Park, and St. Paul. Area Development Zones in cities located outside the seven county Twin Cities' metropolitan area must be located in a city with a minimum population of 25,000 based on the most recent U.S. Census of Population and must be located in a county (or counties) that have experienced a decline in combined employment in manufacturing and wholesale trade between 1987 and the most recent year for which data are available as published by the Minnesota Department of Economic Security. The Area Development Zone must be an existing or proposed industrial park with a minimum size of ten acres. The maximum total number of active zones at any time is 18; the maximum number of active zones in the seven county Twin Cities' metropolitan area is 15. The maximum number of active zones in any community is three. A zone can be "decertified" and a new Area Development Zone established at any time as long as there are no more than three Area Development Zones in a community at any point in time.

RATE

The rates and provisions of the customer's regular rate schedule shall apply except monthly demand charges for customer's Qualified Billing Demand shall be reduced as follows:

Years	Percent Reduction
1 - 3	50%
4	30%
5	20%
6	0%

(Continued on Sheet No. 5-120)

QUALIFIED BILLING DEMAND
The portion of the customer's billing demand that qualifies for reduced demand charges.

New Customers. The total billing demand of new customers shall be defined as Qualified Billing Demand.

Existing Customers. The billing demand in excess of customer's base billing demand shall be defined as qualified billing demand. The base billing demand for each month will be calculated by averaging the monthly billing demands from the two-year period immediately preceding the customer's application for this Rider.

NEW CUSTOMERS
To be considered a new customer for the purpose of this Rider, an applicant must demonstrate one of the following:

1. That business has not been conducted at the premises for at least three monthly billing periods prior to application,
2. That the predecessor customer is in bankruptcy and the applicant has obtained the business in a liquidation of assets sale,
3. Customer's activities are largely or entirely different in nature from that of the previous customer, or
4. If the activities are not so different, that the owner(s), operator(s), or manager(s) are substantially different.

EXISTING CUSTOMERS
Existing customers who materially increase their use of electric service may qualify for service under this Rider, provided such material increase is the result of the addition of equipment, or expansion of the customer's facility or operations. The customer shall notify the Company in writing and document the basis for the material increase in its use of electric service. Following such notification, the Company will review the customer's monthly billing demands. If the billing demands for each of the next three consecutive months exceed that from the comparable monthly period of the preceding year by at least 25%, the customer will be eligible thereafter to receive service under this Rider.

RIGHT TO REFUSE SERVICE
The Company reserves the right to refuse applicants for service under this Rider if it determines that significant additional capital expenditures will be required to provide service to that applicant. In such cases, an applicant may be able to qualify for service by making a non-refundable contribution to compensate for the significant additional capital costs incurred by the Company to supply service to the applicant.

(Continued on Sheet No. 5-121)

ENERGY EFFICIENCY
For service taken on this Rider, the Company will conduct an energy audit and inform the customer of the conservation programs available from the Company.

ELECTRIC SERVICE AGREEMENT
Any customer taking service under this Area Development Rider shall execute an Electric Service Agreement, or amend their existing Electric Service Agreement, with the Company for a period of six years beginning on the effective date on which the customer commences taking service under this Rider; however, customers who began service under the Pilot Area Development Rider before June 28, 1995, with Electric Service Agreement terms of five years, will not be required to amend or modify those agreements. Such Electric Service Agreements (new or amended) shall state the increased or new load level of the customer as well as the customer's obligation to continue to purchase all of their electric power and electric energy from the Company during the term of the agreement.

ECONOMIC DEVELOPMENT RIDER
ELECTRIC (FROZEN)

PURPOSE

The purpose of this Economic Development Rider is to encourage industrial and commercial development and thereby increase economic development opportunities in the Company's service area.

AVAILABILITY

Electric service under this Rider is available to certain customers otherwise qualified for service under the Company's Large General Service or the Company's Large Power Service rates that also meet the criteria stated herein on a first come, first serve basis as determined by the execution of the contract specified herein. The availability of this Rider shall be limited to qualified customers not involved in selling or providing goods and services directly to the general public. The Company will consider all requests for service under this Rider; however, requests will not be accepted for new or expanded facilities under construction or otherwise committed to operation prior to the first effective date of this Rider. Electric service under this Rider is not available in conjunction with service provided pursuant to any other special contract agreements. This Rider is not available to those Customers who have an EDR contract which has an effective date after the effective date of this tariff.

APPLICABILITY

Sufficiently detailed information shall be provided by the Customer to enable the Company to determine whether a facility is qualified for the Rider. Service under this Rider shall be evidenced by a contract between the Customer and the Company, a copy of which shall be submitted to the Commission Staff and Office of Public Counsel.

CRITERIA

Upon the election of the Customer and acceptance by the Company, the provisions of this Rider are applicable to new industrial and commercial customers and to the new facilities of existing industrial and commercial customers who expand operations and who meet the following criteria:

1. Annual kW Demand Criterion: The peak demand of the new customer or additional facilities is reasonably projected to be at least two hundred (200) kW within two (2) years of the new customer or separately measured facilities expansion first receiving service from Company. The new or expanding customer and Company will mutually agree upon a capacity expansion plan to be defined in the electric service agreement.

2. Load Factor Criterion: The annual load factor of the new customer or additional facilities is reasonably projected to exceed fifty-five percent (55%) within two (2) years of the new customer or additional separately measured facilities commencing service under this Rider. The customer must maintain an annual load factor exceeding fifty-five percent (55%) or greater in years three (3) through five (5) of the Rider to continue to be eligible for the incentive provisions. The customer's annual load factor will be reviewed each year on the anniversary of the commencement date of the EDR.

ECONOMIC DEVELOPMENT RIDER (Continued)
ELECTRIC (FROZEN)

CRITERIA (Continued)

The annual load factor of the customer shall be determined by the following relationship.

$$\frac{\text{Annual Energy (kWh) / Hours in Year}}{\text{Maximum Summer Monthly Demand}}$$

The maximum summer monthly demand is defined as the actual measured demand of the new Customer or facilities during the four (4) summer months of June through September.

3. The new or additional facility receives local, regional or state governmental incentives.

INCENTIVE PROVISIONS

1. Rate Discount: Prior to taxes, the Customer's net monthly bill, calculated in accordance with the applicable rate schedules, will be discounted by thirty percent (30%) during the first (1st) contract year, twenty-five percent (25%) during the second (2nd) contract year, twenty percent (20%) during the third (3rd) contract year, fifteen percent (15%) during the fourth (4th) contract year, and ten percent (10%) during the fifth (5th) contract year. After the fifth (5th) contract year, this incentive provision shall cease.

2. Minimum Bill: The minimum monthly bill will be the charge for the minimum monthly Reserved Capacity of two hundred (200) kW pursuant to the applicable rate schedule. Other provisions of the applicable rate schedule which describe the calculation of Reserve Capacity and Billing Capacity apply. After the fifth (5th) contract year, this provision shall cease.

3. Local Service Facilities: The Company will not require an additional facilities or line extension charge for facilities installed to serve the customer if the Company's analysis of expected revenues from the new load on an ongoing basis is determined to be sufficient to justify the required investment in the facilities.

4. Separately Measured Service: Bills to existing Customers, pursuant to the provisions of this or other locations.

5. Shifting of Existing Load: For Customers with existing facilities at one (1) or more locations in the Company's service area, this Rider shall not be applicable to service provided at any other delivery point prior to receiving service under this Rider. Customer is prohibited from shifting loads from those locations already existing in the Company's service area to qualify for this Rider or to receive benefits from this Rider.

October 19, 2013

ECONOMIC DEVELOPMENT RIDER (Continued)
ELECTRIC (FROZEN)

TERM

The Company may file to freeze the availability of this Rider with respect to new loads at any time following one (1) year from the effective date of this tariff. Any Customer receiving service under the Rider on the date it is suspended may continue to receive the benefits of the incentive provisions herein through the remaining period of the Customer's contract.

TERMINATION

Failure of the Customer to meet or maintain any of the applicable criteria of this Rider, used to qualify the Customer for acceptance on the Rider, within the two (2) year period commencing with the date service under this Rider begins, may lead to termination of service under this Rider.

OTHER PROVISIONS

Service under this Rider shall be subject to all other applicable tariffs and the Company's general rules and regulations applying to electric service as the same may change from time to time as provided by law.

FORM OF CONTRACT

This Agreement is entered into as of this ______day of __________, 20_____, by and between Aquila, Inc., d/b/a Aquila Networks (Company) and ______________________________ (Customer).

WITNESSETH:

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

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

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

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

The Company and Customer agree as follows:

1. Service to the Customer's Facilities shall be pursuant to the Rider, all other applicable tariffs, and the Company's General Rules and Regulations Applying to Electric Service, as may be in effect from time to time and approved by the Commission.

ECONOMIC DEVELOPMENT RIDER (Continued)
ELECTRIC (FROZEN)

FORM OF CONTRACT (Continued)

2. Customer acknowledges that this Agreement is not assignable voluntarily by Customer, but shall nevertheless inure to the benefit of and be binding upon the Customer's successors by operation of law so long as the successor continues to meet the criteria of the Rider.

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

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

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

Aquila Networks a division of Aquila, Inc.	__________________ Customer
By __________________	By __________________

October 19, 2013

ECONOMIC DEVELOPMENT RIDER
ELECTRIC

PURPOSE

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

AVAILABILITY

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

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

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

APPLICABILITY

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

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

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

where:

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

STATE OF MISSOURI, PUBLIC SERVICE COMMISSION
P.S.C. MO. No. 1 ______ Original Sheet No. 123.2
Canceling P.S.C. MO. No. ______ Sheet No. ______
KCP&L Greater Missouri Operations Company For Territory Served by L&P and MPS
KANSAS CITY, MO

ECONOMIC DEVELOPMENT RIDER (Continued)
ELECTRIC

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

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

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

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

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

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

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

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

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STATE OF MISSOURI, PUBLIC SERVICE COMMISSION
P.S.C. MO. No. 1 Original Sheet No. 123.3
Canceling P.S.C. MO. No. Sheet No.
KCP&L Greater Missouri Operations Company For Territory Served by L&P and MPS
KANSAS CITY, MO

ECONOMIC DEVELOPMENT RIDER (Continued)
ELECTRIC

INCENTIVE PROVISIONS

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

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

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

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

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

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ECONOMIC DEVELOPMENT RIDER (Continued)
ELECTRIC

INCENTIVE PROVISIONS (cont.)

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

TERMINATION

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

ECONOMIC DEVELOPMENT RIDER (Continued)
ELECTRIC

INCREMENTAL COST ANALYSIS:

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

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

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STATE OF MISSOURI, PUBLIC SERVICE COMMISSION
P.S.C. MO. No. 1 Original Sheet No. 123.6
Canceling P.S.C. MO. No. Sheet No.
KCP&L Greater Missouri Operations Company For Territory Served by L&P and MPS
KANSAS CITY, MO

ECONOMIC DEVELOPMENT RIDER (Continued)
ELECTRIC

INCREMENTAL ANNUAL COST PER KWH:

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

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

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KANSAS CITY POWER & LIGHT COMPANY

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

ECONOMIC DEVELOPMENT RIDER
Schedule EDR (FROZEN)

PURPOSE:

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

AVAILABILITY:

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

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

APPLICABILITY:

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

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

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KANSAS CITY POWER & LIGHT COMPANY

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

ECONOMIC DEVELOPMENT RIDER
Schedule EDR (FROZEN) **(continued)**

APPLICABILITY: (Continued)

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

where:

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

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

a. The creation of 100 or more new permanent full-time jobs;
b. Capital investment of $500,000 or more.

2. The peak demand of the new or additional facility is reasonably projected to be at least two-hundred (200) kW within two years of the date the Customer first receives service under this Rider.

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

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ECONOMIC DEVELOPMENT RIDER
Schedule EDR (FROZEN) **(continued)**

INCENTIVE PROVISIONS:

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

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

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

3. Local Service Facilities:
   The Company will not require a contribution in aid of construction for standard facilities installed to serve the Customer if the expected revenues from the new load are determined to be sufficient to justify the required investment in the facilities.

TERMINATION:

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

ECONOMIC DEVELOPMENT RIDER
Schedule EDR (FROZEN) **(continued)**

FORM OF CONTRACT

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

WITNESSETH:

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

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

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

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

The Company and Customer agree as follows:

1. Service to the Customer's Facilities located at (address) _________________________________, (city) ________________, (state) _____________, (county) ______________ shall be pursuant to the Rider, all other applicable tariffs, and the Company's General Rules and Regulations Applying to Electric Service, as may be in effect from time to time and filed with the Commission.

2. Customer acknowledges that the rate reductions provided by the Rider do not apply to service rendered to the customer during the three (3) months beginning with the first regular meter reading occurring on or after June 1 of each year.

3. Customer further acknowledges that this Agreement is not assignable voluntarily by Customer, but shall nevertheless inure to the benefit of and be binding upon the Customer's successors by operation of law.

ECONOMIC DEVELOPMENT RIDER
Schedule EDR (FROZEN) **(continued)**

FORM OF CONTRACT (continued)

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

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

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

Kansas City Power & Light Company ______________________
Customer

By______________________ By______________________

KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No.	7		☒ Original ☐ Revised	Sheet No.	32E
Cancelling P.S.C. MO. No.			☐ Original ☐ Revised	Sheet No.	
			For	Missouri Retail Service Area	

ECONOMIC DEVELOPMENT RIDER
Schedule EDR

PURPOSE:

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

AVAILABILITY:

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

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

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

APPLICABILITY:

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

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

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ECONOMIC DEVELOPMENT RIDER
Schedule EDR **(continued)**

APPLICABILITY: (Continued)

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

where:

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

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

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

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

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

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

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

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

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

INCENTIVE PROVISIONS:

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

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

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

KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No.	7	☒ Original ☐ Revised	Sheet No.	32H
Cancelling P.S.C. MO. No.		☐ Original ☐	Sheet No.	
		For	Missouri Retail Service Area	

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

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

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

TERMINATION:

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

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KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No.	7	☒ Original ☐ Revised	Sheet No.	32I
Cancelling P.S.C. MO. No.		☐ Original ☐	Sheet No.	
		For	Missouri Retail Service Area	

INCREMENTAL COST ANALYSIS:

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

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

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KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No. 7 ☒ Original ☐ Revised Sheet No. 32J

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

For Missouri Retail Service Area

INCREMENTAL ANNUAL COST PER KWH:

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

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

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RIDER EDRR

ECONOMIC DEVELOPMENT AND RETENTION RIDER

PURPOSE

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

AVAILABILITY

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

APPLICABILITY

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

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

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

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

RIDER EDRR

ECONOMIC DEVELOPMENT AND RETENTION RIDER (Cont'd.)

APPLICABILITY (Cont'd.)

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

INCENTIVE PROVISIONS

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

TERM

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

RIDER ERR

ECONOMIC RE-DEVELOPMENT RIDER

PURPOSE

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

AVAILABILITY

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

Availability of this Rider is subject to the following limitations:

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

RIDER ERR

ECONOMIC RE-DEVELOPMENT RIDER (Cont'd.)

INCENTIVE PROVISIONS

1. Facilities and Relocation Charges

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

2. Discount from Standard Tariff

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

TERMS AND CONDITIONS

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

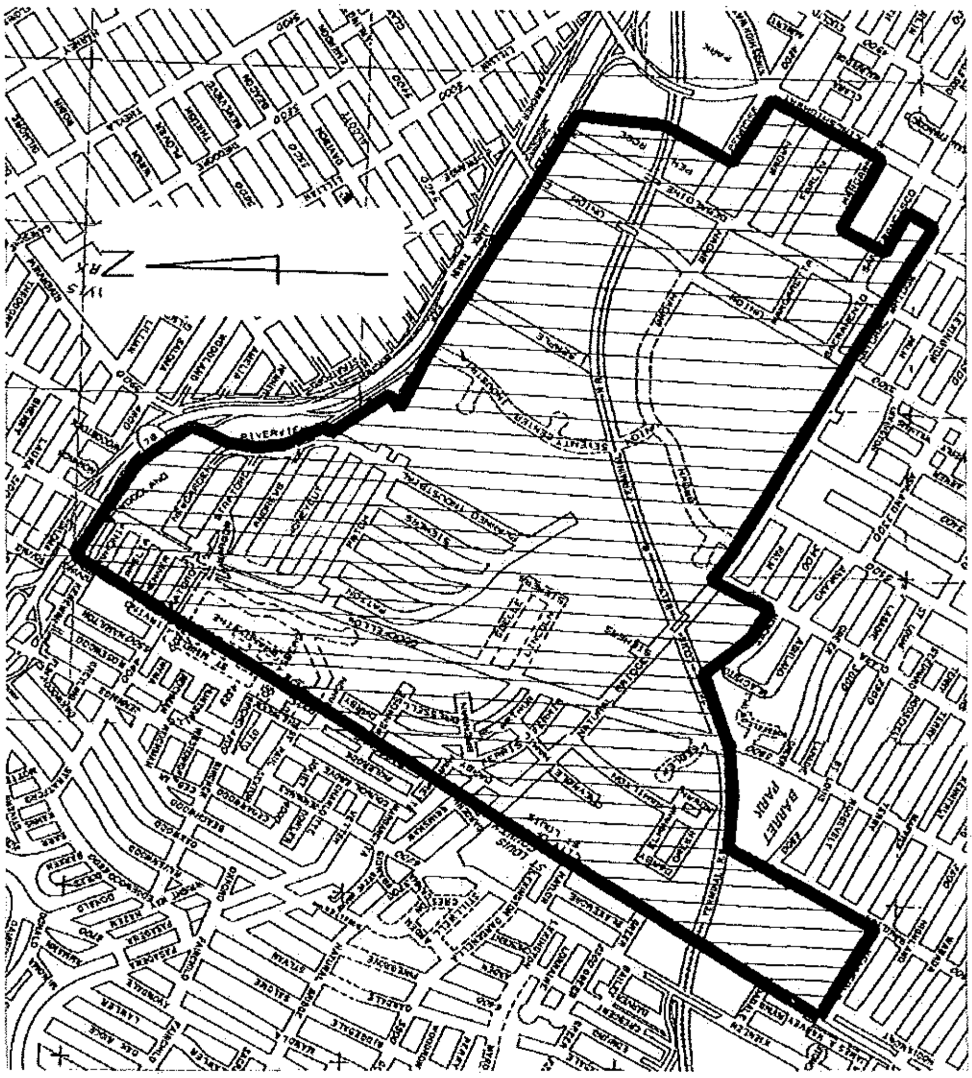
Maps showing the locations qualifying for consideration under this Rider, subject to Company approval, are attached and part of this Rider.

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

RIDER ERR

ECONOMIC RE-DEVELOPMENT RIDER (Cont'd.)

City of St. Louis, Missouri:



UNION ELECTRIC COMPANY ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 87.3

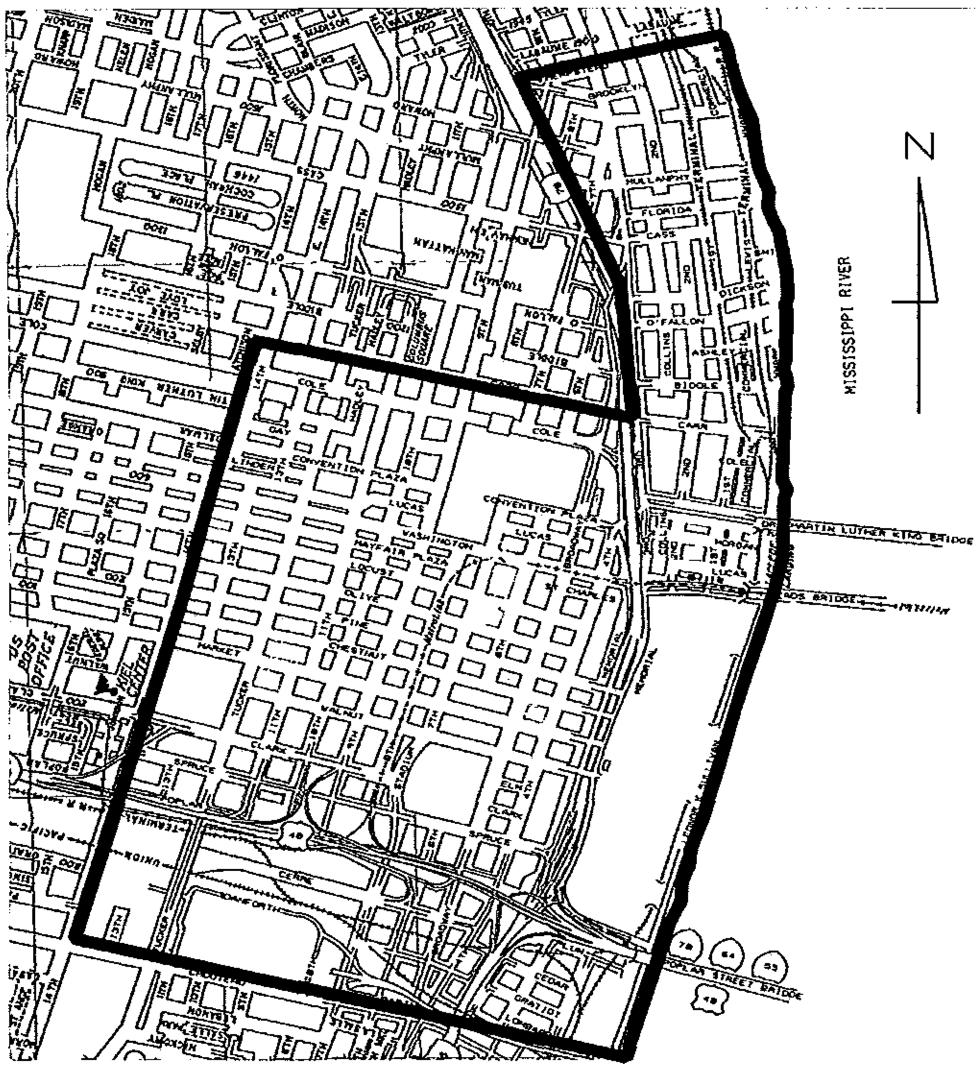
CANCELLING MO.P.S.C. SCHEDULE NO. ______ SHEET NO. ______

APPLYING TO MISSOURI SERVICE AREA

RIDER ERR

ECONOMIC RE-DEVELOPMENT RIDER (Cont'd.)

City of St. Louis, Missouri:



DATE OF ISSUE May 31, 2013 DATE EFFECTIVE June 30, 2013

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri

NAME OF OFFICER TITLE ADDRESS

Attachment GM-2
62/118

UNION ELECTRIC COMPANY ELECTRIC SERVICE

MO P.S.C. SCHEDULE NO. 6 Original SHEET NO. 87.4

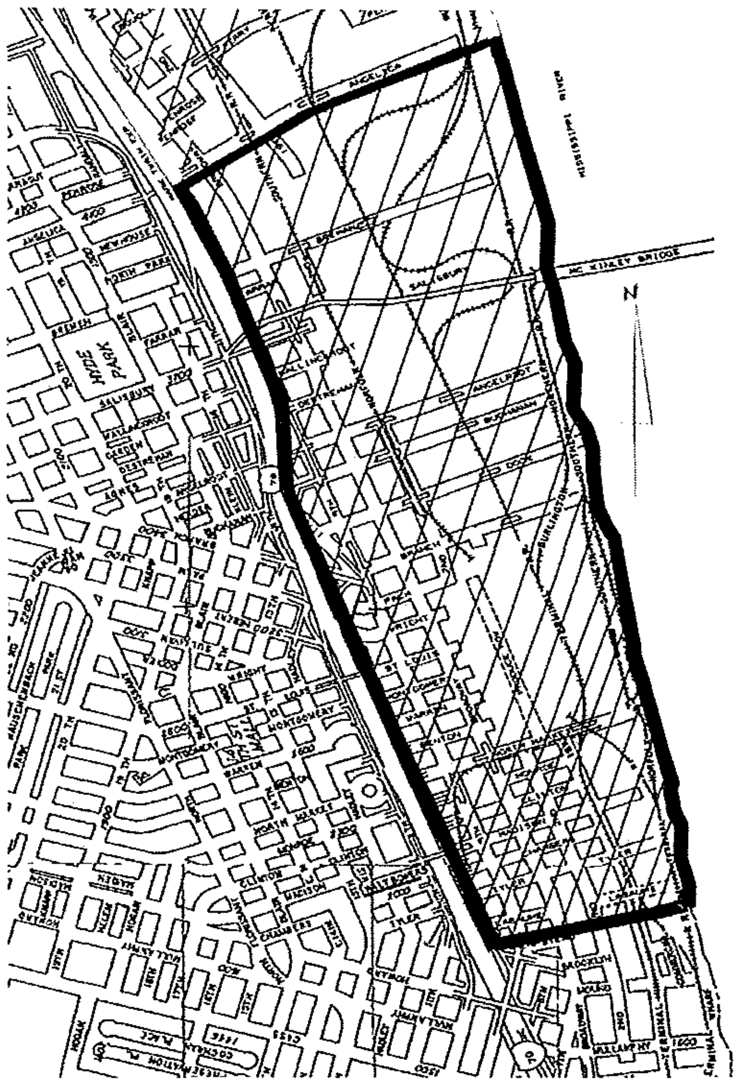
CANCELLING MO P.S.C. SCHEDULE NO. ______ SHEET NO. ______

APPLYING TO MISSOURI SERVICE AREA

RIDER ERR

ECONOMIC RE-DEVELOPMENT RIDER (Cont'd.)

City of St. Louis, Missouri:



DATE OF ISSUE May 31, 2013 DATE EFFECTIVE June 30, 2013

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri

NAME OF OFFICER TITLE ADDRESS

RIDER ERR

ECONOMIC RE-DEVELOPMENT RIDER (Cont'd.)

City of St. Louis, Missouri:

(Closed to new customers after December 31, 2004.)

AVAILABILITY
Available to existing NSP-ND commercial/industrial customers within Company's service territory, and to new commercial/industrial customers considering location to Company's service territory, provided they meet the following qualifications:

1. Projecting new or additional monthly demand of at least 50 kW and new or additional annual energy use of at least 188 MWh. In the case of existing customers, the Rider will apply only to the expanded portion of the total electrical load measured by the increase from billing demands and energy use from the twelve month period prior to application of the Rider for billing purposes.

2. Applicant must have qualified with the local Economic Development Corporation and the Bank of North Dakota for participation in PACE (Partnership in Assisting Community Expansion) loan funding.

RATE
Standard service rates and all other provisions apply, except the level of the energy charge(s) will be reduced by an individually negotiated amount. Rate reductions will be individually negotiated and determined by analyzing the minimum rate reduction required for customer attraction or retention. The minimum energy charge for non-Time of Day customers is 1.7¢ per kWh. The minimum energy charges for time of day customers are 1.95¢ per kWh for on-peak energy and 1.47¢ per kWh for off-peak energy.

TERMS AND CONDITIONS OF SERVICE
1. Company reserves the right to discontinue availability of this Rider to applicants that have previously signed an electric service agreement for this Rider. Company will exercise this right if it anticipates insufficient system capacity, system energy supply, or service reliability.

2. Customer must execute an electric service agreement with Company which will include:
   a. The minimum rate under this Rider, which will recover at least the incremental cost of providing service, including the cost of incremental capacity that is to be added while the rate is in effect
   b. The size of the load served under this Rider.
   c. An annual minimum charge to fully recover distribution cost.

(Continued on Sheet No. 5-85)

TERMS AND CONDITIONS OF SERVICE (Continued)

3. The negotiated energy charge reductions will be decreased according to the differential between the negotiated rates and the standard rates in the tariff used in conjunction with this Rider, as of the effective date of the associated electric service agreement. The rate differentials will be reduced according to the following schedule:

Years	Differential Percent Decrease
1-3	0%
4	25%
5	50%

The electric service agreements will expire at the end of the fifth year. At that time, negotiated rate differentials will be discontinued.

4. Upon expiration of the electric service agreement, Company will continue service to customer with the tariff used in conjunction with this Rider.

5. Company will file an annual report with the North Dakota Public Service Commission which describes activity associated with the application of this Rider.

ECONOMIC DEVELOPMENT COST REMOVAL RIDER

DESCRIPTION	RATE CODE
All Service	50-560

RULES AND REGULATIONS: Terms and conditions of this electric rate schedule and the General Rules and Regulations govern use of this rider.

APPLICATION OF RIDER: This rider is applicable to electric service under all of the Company's Retail Rate Schedules.

COST RECOVERY FACTOR: There shall be included on each North Dakota Customer's monthly bill an Economic Development Cost Removal, which shall be the Economic Development Cost Removal Factor multiplied by all of the Customer's monthly billing kWh's for electric service. This Economic Development Cost Removal shall be calculated before any applicable municipal payment adjustments and sales taxes as provided in the General Rules and Regulations for the Company's electric service. The Economic Development Cost Removal shall be in addition to all charges for service being taken under the Company's standard rate schedules.

Economic Development Cost Removal Factor (0.025) ¢ per Kilowatt-hour

MANDATORY AND VOLUNTARY RIDERS: The amount of a bill for service will be modified by any Mandatory Rate Riders that must apply or Voluntary Rate Riders selected by the Customer, unless otherwise noted in this rider. See sections 12.00, 13.00 and 14.00 of the North Dakota electric rates for the matrices of riders.

RIDER DIR

DEVELOPMENT INCENTIVE RIDER

GENERAL

Under the terms of this Rider, qualifying customers are required to enter into a Service Agreement with the Company. The Development Incentive Rider consists of three separate programs designed to encourage development and/or redevelopment within the Company's service territory. These three programs are 1. the Economic Development Program 2. the Urban Redevelopment Program and 3. the Brownfield Incentive Program. Requirements of these programs are described below.

PROGRAM DESCRIPTIONS

Economic Development Program

Available, at the Company's option, to non-residential customers receiving service under the provisions of one of the Company's non-residential tariff schedules. This Rider is available for load associated with initial permanent service to new establishments, expansion of existing establishments, or new customers in existing establishments who make application to the Company for service under this Rider and the Company approves such application. The new load applicable under this Rider must be a minimum of 1,000 kW at one delivery point. To qualify for service under this Rider, the customer must meet the qualifications as set forth below. Further, the customer must have applied for and received economic assistance from the State or local government or other public agency before the Company will approve a Service Agreement under this Rider. Where the customer is new to the Company's service area or is an existing customer expanding:

1) The customer must employ an additional workforce in the Company's service area of a minimum of twenty-five full-time equivalent (FTE) employees. Employment additions must occur following the Company's approval for service under this Rider, and;

2) The customer's new load must result in minimum customer capital investment of one million dollars ($1,000,000) at the customers' facility within the Company's service area. This capital investment must occur following the Company's approval for service under this Rider. (Item #1 above may be waived where an existing customer's capital investment exceeds $10 million.)

The Company may also consider applying this Rider to an existing customer who, but for economic incentives being provided by the State and/or local government or public agency, would leave the Company's service area. In this event, the following provision applies:

1) The customer must agree, at a minimum, to retain the current number of FTE employees.

Urban Redevelopment Program

Applicable to new customers locating in an existing building of 50,000 square feet or more, which has been unoccupied and/or remained dormant for a period of two years or more, as determined by the Company. The new customer load must be a minimum of 500 kW at one delivery point. In addition, the requested service necessary to serve the new load must not result in additional investment in distribution or transmission facilities by the Company, excepting that minor alterations in the service supplied which can be accomplished feasibly and economically may be allowed.

PROGRAM DESCRIPTIONS (Continued)

Brownfield Redevelopment Program

Applicable to customers locating in a qualified "brownfield" redevelopment area so designated by the Ohio Environmental Protection Agency and served by existing service lines. Additionally, customers are required to take service under the provisions of one of the Company's non-residential tariff schedules.

TERMS AND CONDITIONS

These Riders are not available to a new customer which results from a change in ownership of an existing establishment. However, if a change in ownership occurs after the customer enters into a Service Agreement for service under this Rider, the successor customer may be allowed to fulfill the balance of the Service Agreement under this Rider. This Rider is also not available for renewal of service following interruptions such as equipment failure, temporary plant shutdown, strike, or economic conditions. This Rider is not available for load shifted from one customer to another within the Company's service area.

The customer must enter into a Service Agreement with the Company which shall specify, among other things, the voltage at which the customer will be served, a description of the amount and nature of the new load and the basis on which the customer requests qualification for this Rider.

For customers entering into a Service Agreement under this Rider due to expansion, the Company may, at the customer's expense, install metering equipment necessary to measure the new load to be billed under the provisions of this Rider separate from the customer's existing load which shall be billed under the applicable standard tariff schedule.

Following the effective date of the Service Agreement, the customer must maintain a minimum demand in accordance with the Service Agreement and maintain a monthly average of 300 hours use of demand. Failure to do so will result in the customer's Service Agreement being terminated.

The Company is not obligated to extend, expand or rearrange its facilities if it determines that existing distribution/transmission facilities are of adequate capacity to serve the customer's load.

NET MONTHLY BILLING

The customer shall comply with all terms of the standard distribution tariff rate under which the customer takes service except the customers' monthly distribution demand charge shall be reduced by up to fifty percent for a period of twenty-four months. The customer will pay the full amount of all riders and the entirety of the applicable market-based standard service offer.

The customer may request an effective date of the Service Agreement which is no later than twelve months after Company's approval of the Service Agreement with the customer. A Service Agreement must be fully executed within 30 days of taking the subject new service from the Company. All subsequent billings shall be at the appropriate full standard service tariff rate.

TYPE OF SERVICE

The service provided shall be 60Hz alternating current provided at the Company's standard distribution or transmission voltage.

SERVICE REGULATIONS

The supplying of, and billing for, service and all conditions applying thereto, are subject to the jurisdiction of the Public Utilities Commission of Ohio, and to the Company's Service Regulations currently in effect, as filed with the Public Utilities Commission of Ohio.

RIDER EDR
Economic Development Rider

a. Residential Non-Standard Credit Provision

APPLICABILITY:
Applicable to residential customers taking service under the Company's rate schedule RS to which the Company's Residential Distribution Credit Rider (RDC) applies. This Residential Non-Standard Credit Provision is not applied to customers during the period the customer takes electric generation service from a certified supplier.

RATE:
The following Residential Non-Standard credits are effective for service rendered beginning September 1, 2009, for all kWhs per kWh in excess of 500 kWhs per month which are consumed by the customer during the winter billing periods as defined in the Electric Service Regulations:

Customer rate schedule as of December 31, 2008	
"Optional Load Management" section of Residential Standard (Original Sheet No. 10)	(1.9000)¢
Residential Add-On Heat Pump (Original Sheet No. 11)	(1.9000)¢
Residential Water Heating (Original Sheet No. 12)	(0.5000)¢
Residential Space Heating (Original Sheet No. 13)	(1.9000)¢
Residential Water Heating and Space Heating (Original Sheet No. 14)	(1.9000)¢
Optional Electrically Heated Residential Apartment Schedule (Original Sheet No. 15)	(1.9000)¢

b. Interruptible Credit Provision

APPLICABILITY:
Applicable to all customers who took service under PUCO-approved contracts containing interruptible provisions as of February 1, 2008 and continue to take service based upon the Company's rate schedules GP, GSU, or GT in conjunction with the Company's Economic Load Response Program Rider (ELR). This Interruptible Credit Provision is not applied to customers during the period the customer takes electric generation service from a certified supplier.

RATE:
The following interruptible credits will apply, by rate schedule, effective for service rendered beginning June 1, 2011 by unit of Curtailable Load, as defined in Rider ELR:

GP (per kW)	$ (5.000)
GSU (per kW)	$ (5.000)
GT (per kW)	$ (5.000)

RIDER EDR
Economic Development Rider

c. **Non-Residential Credit Provision**

APPLICABILITY:
Applicable to any customer taking General Service - Transmission (GT), Street Lighting (STL), Traffic Lighting (TRF), and Private Outdoor Lighting (POL) service under the Company's rate schedules. This Non-Residential Credit Provision is not applied during the period a customer takes electric generation service from a certified supplier.

RATE:
The following credits will apply, by rate schedule, effective for service rendered beginning October 1, 2014, for all kWhs, per kWh:

GT	(0.0000)¢
STL	(0.0000)¢
TRF	(2.9207)¢
POL	(0.0000)¢

d. **General Service - Transmission (Rate GT) Provision**

APPLICABILITY:
Applicable to any customer taking service under the Company's General Service – Transmission (Rate GT). This provision is not avoidable for customers who take electric generation service from a certified supplier.

RATE:
The following charge will apply, effective for service rendered beginning June 1, 2009:

GT (per kVA of billing demand)	$ 8.000

The following credit will apply, effective for service rendered beginning October 1, 2014:

GT (all kWhs, per kWh)	(1.7706)¢

ADDITIONAL PROVISION:
The charges provided for by Section (d) of this Rider shall be applied to the greater of (i) the measured monthly on-peak demand, or (ii) 25% of the measured monthly off-peak demand. Monthly on-peak demand is defined as the highest thirty (30) minute integrated kVA between the hours of 6:00 a.m. to 10:00 p.m. EST (equivalent to 7:00 a.m. to 11:00 p.m. EDT), Monday through Friday, excluding holidays. Holidays are defined as New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. Monthly off-peak demand is defined as the highest thirty (30) minute integrated kVA for all other hours. This provision of Rider EDR is reconciled within this subpart (d) quarterly and is revenue neutral to the Companies.

RIDER EDR
Economic Development Rider

e. Standard Charge Provision

APPLICABILITY:
Applicable to any customer that takes electric service under the Company's rate schedules. This Standard Charge Provision is not avoidable for customers who take electric generation service from a certified supplier.

PURPOSE:
The charges provided for by Section (e) of this Rider recover the difference in revenues resulting from the application of rates in the otherwise applicable rate schedule, and the application of credits in sections (a), (b), (c) and (f) of this Rider.

RATE:
The following charges will apply, by rate schedule for all kWhs per kWh:

GS	0.1690¢
GP	0.2994¢

f. School Credit Provision

APPLICABILITY:
Applicable to any public school district building that either: 1) was served under the Company's Energy for Education II program on December 31, 2008, or 2) is a Cleveland Municipal School District building that was served by the Company on January 21, 2009, or 3) is a new public school district building in the Cleveland Municipal School District or in a school district that was served under the Company's Energy for Education II program on December 31, 2008 of which fifty-percent (50%) or more of the total square footage of such building is used for classroom-related purposes including any such building that is a mobile unit or temporary structure. This School Credit Provision is not applied to customers during the period the customer takes electric generation service from a certified supplier.

RATE:
All applicable charges specified in Company's Generation Service Rider (GEN) for General Service - Secondary ("Rate GS"), General Service Primary ("GP"), or General Service - Subtransmission ("GSU") rates, shall be reduced by 8.693 percent.

RIDER EDR
Economic Development Rider

g. Infrastructure Improvement Provision

APPLICABILITY:
Applicable to any customer that takes electric service under the Company's rate schedules with the exception of Street Lighting (STL), Traffic Lighting (TRF), and Private Outdoor Lighting (POL). This Infrastructure Improvement Provision is not avoidable for customers who take electric generation service from a certified supplier. Charges will be allocated in the same manner as the revenue was allocated in the Company's last distribution rate case, with the exception that no charges are allocated to the Street Lighting (STL), Traffic Lighting (TRF) and Private Outdoor Lighting (POL) schedules.

PURPOSE:
The charges provided for by Section (g) of this Rider recover costs associated with certain economic expansion and new employment in Ohio.

RATE:
The following charges will apply, by rate schedule for all kWhs per kWh:

RS	0.0478¢
GS	0.0327¢
GP	0.0120¢
GSU	0.0048¢
GT	0.0015¢

h. Automaker Credit Provision

APPLICABILITY:
Applicable to domestic automaker facilities with more than 45 million kilowatt-hours of consumption for the 12 monthly billing periods ended December 31, 2009 at a single site. This Automaker Credit Provision is available for customers who take electric generation service from a certified supplier.

RATE:
All credits included in Section (h) of this Rider are applied only to usage that exceeds the average of the customer's twelve (12) billing periods ended December 31, 2009 ("Baseline Usage").

First 20 percent of kWh's over Baseline Usage, per kWh	(1.0000)¢
All kWh's exceeding 20% over Baseline Usage, per kWh	(1.2000)¢

RIDER EDR
Economic Development Rider

i. Automaker Charge Provision

APPLICABILITY:
Applicable to any customer that takes electric service under the Company's rate schedules with the exception of General Service - Transmission (GT), Street Lighting (STL), Traffic Lighting (TRF), and Private Outdoor Lighting (POL). This Automaker Charge Provision is not avoidable for customers who take electric generation service from a certified supplier.

PURPOSE:
The charges provided for by Section (i) of this Rider recover costs associated with implementation of the Automaker Credit Provision.

RATE:
The following charge will apply effective for service rendered beginning October 1, 2014, for all kWhs per kWh:

Automaker Charge	0.0068¢

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on a quarterly basis. No later than December 1st, March 1st, June 1st and September 1st of each year, the Company will file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st, April 1st, July 1st and October 1st of each year, beginning October 1, 2011. After May 31, 2016, all provisions of this Rider, except for the Infrastructure Improvement Provision - Section (g), shall be used for reconciliation purposes only.

P.U.C.O. No. 17
ELECTRIC DISTRIBUTION SERVICE
ECONOMIC DEVELOPMENT RIDER

Ohio Law allows for the recovery of costs incurred as a result of economic development and job retention programs including foregone revenues. The rates and charges listed below are designed to recover the cost incurred in DP&L's service territory. The cost associated with these programs may change over time based on customer participation. The Economic Development Rider shall be assessed on kilowatt-hours (kWh) of electricity per tariff class distributed under this Schedule at the rates stated below, effective on a bills-rendered basis in the Company's first billing unit for the month of November 2014.

Residential	$0.0015023	/kWh
Residential Heating	$0.0015023	/kWh
Secondary	$0.0009036	/kWh
Primary	$0.0002730	/kWh
Primary-Substation	$0.0000618	/kWh
High Voltage	$0.0000020	/kWh
Private Outdoor Lighting		
9,500 Lumens High Pressure Sodium	$0.1985139	/lamp/month
28,000 Lumens High Pressure Sodium	$0.4886496	/lamp/month
7,000 Lumens Mercury	$0.3817575	/lamp/month
21,000 Lumens Mercury	$0.7838754	/lamp/month
2,500 Lumens Incandescent	$0.3257664	/lamp/month
7,000 Lumens Fluorescent	$0.3359466	/lamp/month
4,000 Lumens PT Mercury	$0.2188743	/lamp/month
School	$0.0012884	/kWh
Street Lighting	$0.0008016	/kWh

The Economic Development Rider shall be assessed until the Company's costs are fully recovered and may be revised twice a year subject to PUCO approval.

Filed pursuant to the Finding and Order in Case No. 14-1668-EL-RDR dated October 29, 2014 of the Public Utilities Commission of Ohio.

Issued October 31, 2014

Effective November 1, 2014

Issued by
DEREK A. PORTER, President and Chief Executive Officer

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The Dayton Power and Light Company to Update its Economic Development Rider.	))))	Case No. 14-1668-EL-RDR

FINDING AND ORDER

The Commission finds:

(1) The Dayton Power and Light Company (DP&L) is a public utility as defined in R.C. 4905.02, and an electric distribution utility as defined in R.C 4928.01(A)(6), and, as such, is subject to the jurisdiction of this Commission.

(2) On September 30, 2014, DP&L filed an application to update its Economic Development Rider (EDR), pursuant to R.C. 4905.31(E) and Ohio Adm.Code 4901:1-38-08. In its application, DP&L seeks recovery of costs resulting from Commission approved reasonable arrangements with Caterpillar, Inc. and Wright-Patterson Air Force Base. *In re The Dayton Power and Light Company*, Case No. 10-734-EL-AEC, Opinion and Order (April 5, 2011); *In re The Dayton Power and Light Company*, Case No. 11-1163-EL-AEC, Opinion and Order (Dec. 11, 2013). DP&L requests that the updated rates be made effective on a bills-rendered basis by the first billing cycle in November 2014.

(3) On October 20, 2014, Staff filed its Staff Review and Recommendations in regard to the application of DP&L to update its EDR. Staff found that the proposed EDR charges reflect the current and projected costs resulting from the reasonable arrangements approved by the Commission. Staff further found that the proposed charges are expected to provide recovery of approximately $6.6 million in costs over the next six months, which results in an increase to current rates beginning in November 2014. The proposed rates include

projected costs of approximately $3.9 million and approximately $2.7 million in under recovered costs. Additionally, Staff requests the Commission to direct DP&L to file future EDR applications at least 45 days prior to the proposed effective date of the proposed rates. Staff recommends approval of DP&L's application to update its EDR.

(4) The Commission finds that DP&L's application to update its EDR is consistent with R.C. 4905.31(E), and Ohio Adm.Code 4901:1-38-08, does not appear to be unjust or unreasonable, and should be accepted. Further, the Commission finds that DP&L should file future proposed EDR updates within 45 days of the requested effective date of the rider. Finally, the Commission finds that it is unnecessary to hold a hearing in this matter. The Commission finds that DP&L's updated EDR rider should become effective on November 1, 2014.

It is, therefore,

ORDERED, That DP&L's application to update its EDR be accepted in accordance with Finding (4). It is, further,

ORDERED, That DP&L file in final form four complete copies of tariffs consistent with this Finding and Order. One copy shall be filed with this case docket, one shall be filed with DP&L's TRF docket, and the remaining two copies shall be designated for distribution to the Rates and Tariffs Division of the Commission's Utilities Department. The Applicant shall also update their respective tariffs previously filed electronically with the Commission's Docketing Division. It is, further,

ORDERED, That DP&L shall notify all effected customers via a bill message or via a bill insert within 30 days of the effective date of the tariffs. A copy of the customer notice shall be submitted to the Commission's Service Monitoring and Enforcement Department, Reliability and Service Analysis Division. It is, further,

ORDERED, That nothing in this Finding and Order shall be binding upon this Commission in any future proceeding or investigation involving the justness or reasonableness of any rate, charge, rules, or regulation. It is, further, ORDERED, That a copy of this Finding and Order be served upon all parties of record.

THE PUBLIC UTILITIES COMMISSION OF OHIO

Thomas W. Johnson, Chairman

Steven D. Lesser

Lynn Slaby

M. Beth Trombold

Asim Z. Haque

GAP/MJA/sc

Entered in the Journal

OCT 2 9 2014

Barcy F. McNeal

Barcy F. McNeal
Secretary

RIDER EDR
Economic Development Rider

a. Residential Non-Standard Credit Provision

APPLICABILITY:
Applicable to residential customers taking service under the Company's rate schedule RS to which the Company's Residential Distribution Credit Rider (RDC) applies. This Residential Non-Standard Credit Provision is not applied to customers during the period the customer takes electric generation service from a certified supplier.

RATE:
The following Residential Non-Standard credits are effective for service rendered beginning September 1, 2009, for all kWhs per kWh in excess of 500 kWhs per month which are consumed by the customer during the winter billing periods as defined in the Electric Service Regulations:

Customer rate schedule as of December 31, 2008	
"Special Provisions" of Residential Standard Rate Schedule (Original Sheet No. 10)	(0.0000)¢
Residential Space Heating Rate (Original Sheet No. 11)	(1.9000)¢
Residential Optional Time-of-Day (Original Sheet No. 12)	(1.9000)¢
Residential Optional Controlled Service Rider (Original Sheet No. 14)	(1.9000)¢
Residential Load Management Rate (Original Sheet No. 17)	(1.9000)¢
Residential Water Heating Service (Original Sheet No. 18)	(0.0000)¢
Residential Optional Electrically Heated Apartment Rate (Original Sheet No. 19)	(1.9000)¢

b. Interruptible Credit Provision

APPLICABILITY:
Applicable to all customers who took service under the Company's interruptible tariffs set forth below as of February 1, 2008 and continue to take service based upon the Company's rate schedules GP, GSU, or GT in conjunction with the Company's Economic Load Response Program Rider (ELR). This Interruptible Credit Provision is not applied to customers during the period the customer takes electric generation service from a certified supplier.

Interruptible Electric Arc Furnace Rate	Original Sheet No. 29
Interruptible Rider – General Service Large and High Use Manufacturing	Original Sheet No. 73
Interruptible Rider – Metal Melting Load	Original Sheet No. 74
Interruptible Rider – Incremental Interruptible Service	Original Sheet No. 75

RATE:
The following interruptible credits will apply, by rate schedule, effective for service rendered beginning June 1, 2011 by unit of Curtailable Load, as defined in Rider ELR:

GP (per kW)	$ (5.000)
GSU (per kW)	$ (5.000)
GT (per kW)	$ (5.000)

RIDER EDR
Economic Development Rider

c. **Non Residential Credit Provision**

APPLICABILITY:
Applicable to any customer taking General Service - Transmission (GT), Street Lighting (STL) and Traffic Lighting (TRF) service under the Company's rate schedules. This Non-Residential Credit Provision is not applied during the period a customer takes electric generation service from a certified supplier.

RATE:
The following credits will apply, by rate schedule, effective for service rendered beginning October 1, 2014, for all kWhs, per kWh:

GT	(0.0000)¢
STL	(0.3579)¢
TRF	(1.5230)¢
POL	(2.4799)¢

d. **General Service - Transmission (Rate GT) Provision**

APPLICABILITY:
Applicable to any customer taking service under the Company's General Service – Transmission (Rate GT). This provision is not avoidable for customers who take electric generation service from a certified supplier.

RATE:
The following charge will apply, effective for service rendered beginning June 1, 2009:

GT (per kVA of billing demand)	$ 8.000

The following credit will apply, effective for service rendered beginning October 1, 2014:

GT (all kWhs, per kWh)	(1.7708)¢

ADDITIONAL PROVISION:
The charges provided for by Section (d) of this Rider shall be applied to the greater of (i) the measured monthly on-peak demand, or (ii) 25% of the measured monthly off-peak demand. Monthly on-peak demand is defined as the highest thirty (30) minute integrated kVA between the hours of 6:00 a.m. to 10:00 p.m. EST (equivalent to 7:00 a.m. to 11:00 p.m. EDT), Monday through Friday, excluding holidays. Holidays are defined as New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. Monthly off-peak demand is defined as the highest thirty (30) minute integrated kVA for all other hours. This provision of Rider EDR is reconciled within this subpart (d) quarterly and is revenue neutral to the Companies.

RIDER EDR
Economic Development Rider

e. **Standard Charge Provision**

APPLICABILITY:
Applicable to any customer that takes electric service under the Company's rate schedules. This Standard Charge Provision is not avoidable for customers who take electric generation service from a certified supplier.

PURPOSE:
The charges provided for by Section (e) of this Rider recover the difference in revenues resulting from the application of rates in the otherwise applicable rate schedule, and the application of credits in sections (a), (b), (c), and (f) of this Rider.

RATE:
The following charges will apply, by rate schedule for all kWhs per kWh:

GS	0.1777¢
GP	0.1739¢

f. **School Credit Provision**

APPLICABILITY:
Applicable to any public school district building that either: 1) was served under the Company's Energy for Education II program on December 31, 2008, or 2) is a new public school district building in a school district served under the Company's Energy for Education II program on December 31, 2008 of which fifty-percent (50%) or more of the total square footage of such building is used for classroom-related purposes including any such building that is a mobile unit or temporary structure. This School Credit Provision is not applied to customers during the period the customer takes electric generation service from a certified supplier.

RATE:
All applicable charges specified in Company's Generation Service Rider (GEN) for General Service - Secondary ("Rate GS"), General Service Primary ("GP"), or General Service - Subtransmission ("GSU") rates, shall be reduced by 8.023 percent.

RIDER EDR
Economic Development Rider

g. **Infrastructure Improvement Provision**

APPLICABILITY:
Applicable to any customer that takes electric service under the Company's rate schedules with the exception of Street Lighting (STL), Traffic Lighting (TRF), and Private Outdoor Lighting (POL). This Infrastructure Improvement Provision is not avoidable for customers who take electric generation service from a certified supplier. Charges will be allocated in the same manner as the revenue was allocated in the Company's last distribution rate case, with the exception that no charges are allocated to the Street Lighting (STL), Traffic Lighting (TRF) and Private Outdoor Lighting (POL) schedules.

PURPOSE:
The charges provided for by Section (g) of this Rider recover costs associated with certain economic expansion and new employment in Ohio.

RATE:
The following charges will apply, by rate schedule for all kWhs per kWh:

RS	0.0478¢
GS	0.0327¢
GP	0.0120¢
GSU	0.0048¢
GT	0.0015¢

h. **Automaker Credit Provision**

APPLICABILITY:
Applicable to domestic automaker facilities with more than 45 million kilowatt-hours of consumption for the 12 monthly billing periods ended December 31, 2009 at a single site. This Automaker Credit Provision is available for customers who take electric generation service from a certified supplier.

RATE:
All credits included in Section (h) of this Rider are applied only to usage that exceeds the average of the customer's twelve (12) billing periods ended December 31, 2009 ("Baseline Usage").

First 20 percent of kWh's over Baseline Usage, per kWh	(1.0000)¢
All kWh's exceeding 20% over Baseline Usage, per kWh	(1.2000)¢

RIDER EDR
Economic Development Rider

i. **Automaker Charge Provision**

APPLICABILITY:
Applicable to any customer that takes electric service under the Company's rate schedules with the exception of General Service - Transmission (GT), Street Lighting (STL), Traffic Lighting (TRF), and Private Outdoor Lighting (POL). This Automaker Charge Provision is not avoidable for customers who take electric generation service from a certified supplier.

PURPOSE:
The charges provided for by Section (i) of this Rider recover costs associated with implementation of the Automaker Credit Provision.

RATE:
The following charge will apply effective for service rendered beginning October 1, 2014, for all kWhs per kWh:

Automaker Charge	0.0068¢

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on a quarterly basis. No later than December 1st, March 1st, June 1st and September 1st of each year, the Company will file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st, April 1st, July 1st and October 1st of each year, beginning October 1, 2011. After May 31, 2016, all provisions of this Rider, except for the Infrastructure Improvement Provision - Section (g), shall be used for reconciliation purposes only.

ECONOMIC DEVELOPMENT COST RECOVERY RIDER

Effective Cycle 1 October 2014, all customer bills subject to the provisions of this Rider, including any bills rendered under special contract, shall be adjusted by the Economic Development Cost Recovery charge of 11.44664% of the customer's distribution charges under the Company's Schedules, excluding charges under any applicable Riders. This Rider shall be adjusted periodically to recover amounts authorized by the Commission.

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Power Company to Adjust Its Economic Development Rider Rate.	)))	Case No. 14-1329-EL-RDR

FINDING AND ORDER

The Commission finds:

(1) Ohio Power Company d/b/a AEP Ohio (AEP Ohio or the Company) is a public utility as defined in R.C. 4905.02 and an electric utility as defined in R.C. 4928.01(A)(11), and, as such, is subject to the jurisdiction of this Commission.

(2) On August 1, 2014, AEP Ohio filed an application to adjust its economic development rider (EDR) rate. AEP Ohio states that, in Case No. 11-346-EL-SSO, et al., the Commission approved the EDR, which is to be adjusted periodically to recover economic development amounts authorized by the Commission. *In re Columbus Southern Power Company and Ohio Power Company,* Case No. 11-346-EL-SSO, et al., Opinion and Order (Aug. 8, 2012) at 66-67. In AEP Ohio's prior EDR rate adjustment case, the EDR rate was set at 10.89905 percent of base distribution rates. *In re Ohio Power Company,* Case No. 14-193-EL-RDR, Finding and Order (Mar. 26, 2014). In the application in the present case, AEP Ohio proposes to increase the EDR rate to 11.44664 percent to be effective with the first billing cycle in October 2014.

(3) In support of its application, AEP Ohio explains that the proposed EDR rate is based on estimated cost under-recoveries as evidenced by the projected 2014 delta revenues, as well as on the actual and projected delta revenues associated with the Company's reasonable arrangements with Ormet Primary Aluminum Corporation (Ormet), Eramet Marietta, Inc. (Eramet), Globe Metallurgical, Inc. (Globe), and The Timken Company. Further, AEP Ohio notes that, in calculating the proposed EDR rate, the Company has included only the Ormet

deferrals previously authorized by the Commission for recovery through the EDR.

(4) AEP Ohio states that its calculation of the proposed EDR rate, as in prior EDR applications, utilizes a levelized rate approach previously approved by the Commission, including the accrual of a carrying cost at the weighted average cost of the Company's long-term debt on the under-recovery caused by the levelized EDR rate. AEP Ohio adds that, if it determines during the EDR rate period that the EDR collections are or will be substantially different than anticipated or that the unrecovered costs based on delta revenues are or will be substantially different than anticipated, the Company will file an application to modify the EDR rate for the remainder of the rate period. AEP Ohio notes that it will continue to track the delta revenues and the EDR collections in order to reconcile any difference through subsequent EDR rate adjustments.

(5) Additionally, AEP Ohio notes that, consistent with the Commission's prior approval of a modified treatment of carrying costs, the Company has used an approach that collects the cumulative carrying charge balance each month, while the remaining revenue is applied to the regulatory asset.

(6) Finally, AEP Ohio explains that its proposed EDR rate is just and reasonable and that a hearing is not necessary. AEP Ohio requests that, at the conclusion of the 20-day comment period prescribed by Ohio Adm.Code 4901:1-38-08(C), the Commission approve the application in time for the new EDR rate to take effect with the first billing cycle of October 2014.

(7) Along with its application, AEP Ohio filed a motion for protective treatment of customer-specific information filed in certain schedules under seal on behalf of Eramet, Globe, and The Timken Company, in accordance with Ohio Adm.Code 4901-1-24. According to AEP Ohio, Ormet does not believe there is any need to redact the customer load information or to seek protective treatment for the information in the Company's schedules. While AEP Ohio

takes no position as to the confidential and proprietary nature of the information under Ohio law, the Company notes that it filed the motion to permit its customers a timely opportunity to seek protective treatment.

(8) On August 5, 2014, and August 12, 2014, Globe and Eramet, respectively, filed motions to intervene and motions for a protective order. The Timken Company and TimkenSteel Corporation (jointly, Timken) also filed a motion for intervention and a motion for a protective order on August 20, 2014. In their respective motions to intervene, Globe, Eramet, and Timken state that they are each served by AEP Ohio pursuant to a Commission-approved reasonable arrangement, and each also notes that its customer-specific information is part of the Company's EDR application. Globe, Eramet, and Timken assert that they may be affected by AEP Ohio's proposed adjustment to its EDR rate and, as such, each claims a direct, real, and substantial interest in this case that cannot be adequately represented by any other party to the proceeding. For these reasons, Globe, Eramet, and Timken request that the Commission grant their respective motions for intervention. No memoranda contra the motions to intervene of Globe, Eramet, and Timken were filed.

(9) In their motions for protective treatment, Globe, Eramet, and Timken state that AEP Ohio's EDR application includes certain customer-specific information related to electric usage and pricing that is confidential, sensitive, and proprietary trade secret information, as defined in R.C. 1333.61(D), and, as recognized by Ohio Adm.Code 4901-1-24(A)(7). According to Globe, Eramet, and Timken, if the customer-specific information is released to the public, it would compromise their business position and ability to compete, as well as disclose physical limits and the nature of the manufacturing process. Globe, Eramet, and Timken assert that non-disclosure of the customer-specific information is not inconsistent with the purposes of R.C. Title 49. No memoranda contra the motions for protective treatment were filed.

(10) The Commission finds that Globe, Eramet, and Timken have set forth reasonable grounds for intervention and, therefore, their respective motions to intervene should be granted. With respect to the pending motions for protective orders, we note that the Commission has previously granted protective treatment for the same customer usage and pricing information that is the subject of the pending motions. *In re Ohio Power Company*, Case No. 14-193-EL-RDR, Finding and Order (Mar. 26, 2014) at 5. The Commission again finds that the motions for protective treatment filed by AEP Ohio, Globe, Eramet, and Timken are reasonable and should be granted. Pursuant to Ohio Adm.Code 4901-1-24(F), this protective order shall expire 24 months after the issuance of this Finding and Order, unless an appropriate motion seeking to continue protective treatment is filed at least 45 days in advance of the expiration date.

(11) On September 5, 2014, Staff filed its review and recommendations regarding AEP Ohio's application to adjust its EDR rate. After reviewing AEP Ohio's application and supporting schedules, Staff recommends that the Commission approve the proposed EDR rate of 11.44664 percent.

(12) Under Ohio Adm.Code 4901:1-38-08(A)(5), the Commission requires that an electric utility's EDR rate be updated and reconciled semiannually. Ohio Adm.Code 4901:1-38-08(C) permits affected persons to file a motion to intervene, as well as comments and objections to the electric utility's application, within 20 days of the date on which the application is filed. Additionally, the Commission has previously directed AEP Ohio to file an application to adjust its EDR rate to allow the Commission sufficient time to review the filing and perform due diligence with regard to the application in order to facilitate implementation of the adjusted EDR rate with the first billing cycle of April and October. *In re Columbus Southern Power Company and Ohio Power Company*, Case No. 09-1095-EL-RDR, Finding and Order (Jan. 7, 2010) at 12.

(13) Upon review of AEP Ohio's application to adjust its EDR rate and Staff's recommendations, the Commission finds that the application does not appear to be unjust or unreasonable and that it should be approved. Therefore, the Commission finds that it is unnecessary to hold a hearing in this matter.

The Commission further finds that AEP Ohio's proposed EDR rate of 11.44664 percent is reasonable. We also find, consistent with our rulings on prior EDR applications, that the levelized approach proposed by AEP Ohio for the collection of EDR costs is a just and reasonable means of collection, as it will operate to avoid the extreme swings in EDR costs linked to the structure of reasonable arrangements. We find it reasonable for AEP Ohio to accrue a carrying cost on the under-recovery of delta revenues due to the levelized rate and, to the extent that there is an over-recovery of delta revenues, customers shall be afforded symmetrical treatment. Therefore, if an over-recovery of delta revenues occurs, AEP Ohio shall credit customers with the value of the equivalent carrying cost, calculated according to the weighted average cost of long-term debt.

Accordingly, the Commission authorizes AEP Ohio to implement an adjusted EDR rate of 11.44664 percent to be effective with bills rendered in the first billing cycle of October 2014.

It is, therefore,

ORDERED, That the motions for intervention filed by Globe, Eramet, and Timken be granted. It is, further,

ORDERED, That the motions for protective treatment filed by AEP Ohio, Globe, Eramet, and Timken be granted. It is, further,

ORDERED, That AEP Ohio's application to adjust its EDR rate be approved. It is, further,

ORDERED, That AEP Ohio be authorized to implement its adjusted EDR rate of 11.44664 percent effective with bills rendered for the first billing cycle of October 2014. It is, further, ORDERED, That a copy of this Finding and Order be served upon all parties and interested persons of record.

THE PUBLIC UTILITIES COMMISSION OF OHIO

Thomas W. Johnson, Chairman

Steven D. Lesser

Lynn Slaby

M. Beth Trombold

Asim Z. Haque

SJP/sc

Entered in the Journal
SEP 17 2014

Barcy F. McNeal
Secretary

RIDER EDR
Economic Development Rider

a. Residential Non-Standard Credit Provision

APPLICABILITY:
Applicable to residential customers taking service under the Company's rate schedule RS to which the Company's Residential Distribution Credit Rider (RDC) applies. This Residential Non-Standard Credit Provision is not applied to customers during the period the customer takes electric generation service from a certified supplier.

RATE:
The following Residential Non-Standard credits are effective for service rendered beginning September 1, 2009, for all kWhs per kWh in excess of 500 kWhs per month which are consumed by the customer during the winter billing periods as defined in the Electric Service Regulations:

Customer rate schedule as of December 31, 2008	
Residential Rate "R-02" (Add-On Heat Pump)-Original Sheet No. 11	(1.9000)¢
Residential Rate "R-06" (Space Heating and Water Heating)-Original Sheet No. 13	(1.9000)¢
Residential Rate "R-06a" (Space Heating and Water Heating)-Original Sheet No. 14	(1.9000)¢
Residential Rate "R-04" (Water Heating)-Original Sheet No. 15	(0.5000)¢
Residential Rate "R-04a" (Water Heating)-Original Sheet No. 16	(0.5000)¢
Residential Rate "R-07" (Space Heating)-Original Sheet No. 17	(1.9000)¢
Residential Rate "R-07a" (Space Heating)-Original Sheet No. 18	(1.9000)¢
Residential Rate "R-09" (Apartment Rate)-Original Sheet No. 19	(1.9000)¢
Residential Rate "R-09a" (Apartment Rate)-Original Sheet No. 20	(1.9000)¢

b. Interruptible Credit Provision

APPLICABILITY:
Applicable to all customers who took service under PUCO-approved contracts containing interruptible provisions as of February 1, 2008 and continue to take service based upon the Company's rate schedules GP, GSU, or GT in conjunction with the Company's Economic Load Response Program Rider (ELR). This Interruptible Credit Provision is not applied to customers during the period the customer takes electric generation service from a certified supplier.

RATE:
The following interruptible credits will apply, by rate schedule, effective for service rendered beginning June 1, 2011 by unit of Curtailable Load, as defined in Rider ELR:

GP (per kW)	$ (5.000)
GSU (per kW)	$ (5.000)
GT (per kW)	$ (5.000)

RIDER EDR
Economic Development Rider

c. **Non Residential Credit Provision**

APPLICABILITY:
Applicable to any customer taking General Service - Transmission (GT), Street Lighting (STL), Traffic Lighting (TRF), and Private Outdoor Lighting (POL) service under the Company's rate schedules. This Non-Residential Credit Provision is not applied during the period a customer takes electric generation service from a certified supplier.

RATE:
The following credits will apply, by rate schedule, effective for service rendered beginning October 1, 2014, for all kWhs, per kWh:

GT	(0.0000)¢
STL	(0.0000)¢
TRF	(0.7235)¢
POL	(0.0000)¢

d. **General Service - Transmission (Rate GT) Provision**

APPLICABILITY:
Applicable to any customer taking service under the Company's General Service – Transmission (Rate GT). This provision is not avoidable for customers who take electric generation service from a certified supplier.

RATE:
The following charge will apply, effective for service rendered beginning June 1, 2009:

GT (per kVA of billing demand)	$ 8.000

The following credit will apply, effective for service rendered beginning October 1, 2014:

GT (all kWhs, per kWh)	(1.7706)¢

ADDITIONAL PROVISION:
The charges provided for by Section (d) of this Rider shall be applied to the greater of (i) the measured monthly on-peak demand, or (ii) 25% of the measured monthly off-peak demand. Monthly on-peak demand is defined as the highest thirty (30) minute integrated kVA between the hours of 6:00 a.m. to 10:00 p.m. EST (equivalent to 7:00 a.m. to 11:00 p.m. EDT), Monday through Friday, excluding holidays. Holidays are defined as New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. Monthly off-peak demand is defined as the highest thirty (30) minute integrated kVA for all other hours. This provision of Rider EDR is reconciled within this subpart (d) quarterly and is revenue neutral to the Companies.

RIDER EDR
Economic Development Rider

e. **Standard Charge Provision**

APPLICABILITY:
Applicable to any customer that takes electric service under the Company's rate schedules. This Standard Charge Provision is not avoidable for customers who take electric generation service from a certified supplier.

PURPOSE:
The charges provided for by Section (e) of this Rider recover the difference in revenues resulting from the application of rates in the otherwise applicable rate schedule, and the application of credits in sections (a), (b), (c), and (f), of this Rider.

RATE:
The following charges will apply, by rate schedule for all kWhs per kWh:

GS	0.0871¢
GP	0.3797¢

f. **School Credit Provision**

APPLICABILITY:
Applicable to any public school district building that either: 1) was served under the Company's Energy for Education II program on December 31, 2008, or 2) is a new public school district building in a school district served under the Company's Energy for Education II program on December 31, 2008 of which fifty-percent (50%) or more of the total square footage of such building is used for classroom-related purposes including any such building that is a mobile unit or temporary structure. This School Credit Provision is not applied to customers during the period the customer takes electric generation service from a certified supplier.

RATE:
All applicable charges specified in Company's Generation Service Rider (GEN) for General Service - Secondary ("Rate GS"), General Service Primary ("GP"), or General Service - Subtransmission ("GSU") rates, shall be reduced by 8.693 percent.

RIDER EDR
Economic Development Rider

g. **Infrastructure Improvement Provision**

APPLICABILITY:
Applicable to any customer that takes electric service under the Company's rate schedules with the exception of Street Lighting (STL), Traffic Lighting (TRF), and Private Outdoor Lighting (POL). This Infrastructure Improvement Provision is not avoidable for customers who take electric generation service from a certified supplier. Charges will be allocated in the same manner as the revenue was allocated in the Company's last distribution rate case, with the exception that no charges are allocated to the Street Lighting (STL), Traffic Lighting (TRF) and Private Outdoor Lighting (POL) schedules.

PURPOSE:
The charges provided for by Section (g) of this Rider recover costs associated with certain economic expansion and new employment in Ohio.

RATE:
The following charges will apply, by rate schedule for all kWhs per kWh:

RS	0.0478¢
GS	0.0327¢
GP	0.0120¢
GSU	0.0048¢
GT	0.0015¢

h. **Automaker Credit Provision**

APPLICABILITY:
Applicable to domestic automaker facilities with more than 45 million kilowatt-hours of consumption for the 12 monthly billing periods ended December 31, 2009 at a single site. This Automaker Credit Provision is available for customers who take electric generation service from a certified supplier.

RATE:
All credits included in Section (h) of this Rider are applied only to usage that exceeds the average of the customer's twelve (12) billing periods ended December 31, 2009 ("Baseline Usage").

First 20 percent of kWh's over Baseline Usage, per kWh	(1.0000)¢
All kWh's exceeding 20% over Baseline Usage, per kWh	(1.2000)¢

RIDER EDR
Economic Development Rider

i. Automaker Charge Provision

APPLICABILITY:
Applicable to any customer that takes electric service under the Company's rate schedules with the exception of General Service - Transmission (GT), Street Lighting (STL), Traffic Lighting (TRF), and Private Outdoor Lighting (POL). This Automaker Charge Provision is not avoidable for customers who take electric generation service from a certified supplier.

PURPOSE:
The charges provided for by Section (i) of this Rider recover costs associated with implementation of the Automaker Credit Provision.

RATE:
The following charge will apply effective for service rendered beginning October 1, 2014, for all kWhs per kWh:

Automaker Charge	0.0068¢

RIDER UPDATES:

The charges contained in this Rider shall be updated and reconciled on a quarterly basis. No later than December 1st, March 1st, June 1st and September 1st of each year, the Company will file with the PUCO a request for approval of the Rider charges which, unless otherwise ordered by the PUCO, shall become effective on a service rendered basis on January 1st, April 1st, July 1st and October 1st of each year, beginning October 1, 2011. After May 31, 2016, all provisions of this Rider, except for the Infrastructure Improvement Provision - Section (g), shall be used for reconciliation purposes only.

BUSINESS DEVELOPMENT SERVICE

AVAILABLE

At points on the Company's existing transmission or distribution facilities supplied by its interconnected transmission system within Butte, Custer, Fall River, Lawrence, Meade, and Pennington Counties of South Dakota.

APPLICABLE

To customers requiring an appropriate response to non-standard unique or specialized electric services and/or to meet competitive forces in the energy services markets in a manner that satisfies the needs of participating customers while balancing the interests of the participating customer, the non-participating customers, and the Company.

CHARACTER OF SERVICE

Alternating current, 60 hertz, at the voltage and phase of the Company's established transmission or distribution system most available to the location of the customer.

ELIGIBILITY

Customers requesting Business Development Service (BDS) will be considered upon written application to the Company if one or more of the following conditions is shown by the customer to exist:

1. The customer accepts non-standard electric service for new or existing load;
2. The customer has unique requirements for new load;
3. The customer intends to acquire its electric service for new or existing load from a source other than the Company absent service under this rate by showing:
   a. The customer demonstrates a competitive alternative, energy source or business locations, to the Company's standard tariff rates; and
   b. The comparative economics, including but not limited to availability of capital, environmental impacts and assessment of risk, of the alternative over the Company's standard tariffed rates are material; and

BUSINESS DEVELOPMENT SERVICE

ELIGIBILITY *(continued)*

c. The alternative is demonstrated to be technologically feasible and legally permissible; and
d. The customer has taken substantial steps to fairly evaluate the alternative sufficient to establish the customer's actual ability to utilize the alternative within a reasonable period of time.

Upon receipt of the customer's written application, and such additional information as the Company may require, the Company and the applying customer may, at the sole discretion of either party, commence negotiation of rates and terms and conditions of service under this tariff. If a mutually acceptable agreement is reached, the agreement and full support for it shall be forwarded to the Commission for their file of contracts with deviations as authorized by this rate schedule.

CONTRACT PROVISIONS

All mutually acceptable service agreements will meet these minimum standards:

1. The initial service term shall not be less than three years; and
2. No service term shall exceed 7 years without the inclusion of language providing for renegotiation by the Company.
3. The minimum written notice of cancellation by either party shall be nine months; and
4. The customer shall not be eligible for any discounts or service conditions except as provided for in the service agreement; and
5. The compensation to be received under the service agreement during its term shall exceed the marginal cost to the Company of performance under the contact; and
6. The rate for metered service will be designed to encourage the customer to improve load factor, calculated using the customer's On-Peak KVA; and
7. Minimum contract demand is 250 KVA; and
8. The terms and conditions of service shall be those contained in the service agreement between the Company and the customer; and
9. Identification of the rate schedule that customer would have received service under in lieu of BDS.

BUSINESS DEVELOPMENT SERVICE

RATE

All charges for service under this rate shall be the charges contained in the contract between the Company and the customer.

CONFIDENTIALITY

Upon request of the Company or the customer, upon good cause shown by affidavit, all terms and conditions of any service agreement under this rate schedule and any supporting information shall be protected from disclosure as confidential in accordance with the Commission's Administrative Rules provided for at Section 20:10:01:41 and 20:10:01:42.

COST ADJUSTMENT

The above schedule of charges shall be adjusted in accordance with the applicable Cost Adjustment tariffs in Section No.3C, Tariff Sheet No. 11. (T)

When the billing period includes a change in the charges of an above referenced Cost Adjustment tariff, the customer's bill shall be prorated accordingly.

PAYMENT

Net monthly bills are due and payable twenty days from the date of the bill, and after that date the account becomes delinquent. A late payment charge of 1.5% on the current unpaid balance shall be calculated and included as part of each monthly billing. A non-sufficient funds charge of $15.00 shall apply to process a payment from a customer that is returned to the Company by the bank as not payable. If a bill is not paid, the Company shall have the right to suspend service, providing ten (10) days written notice of such suspension has been given. When service is suspended for nonpayment of a bill, a Customer Service Charge will apply.

MONTANA-DAKOTA
UTILITIES CO.
A Division of MDU Resources Group, Inc.
400 North Fourth Street
Bismarck, ND 58501

STATE OF SOUTH DAKOTA
ELECTRIC RATE SCHEDULE

SD P.U.C. Section No. 3
2nd Revised Sheet No. 5.3
Cancelling 1st Revised Sheet No. 5.3

LARGE GENERAL ELECTRIC SERVICE Rate 30

AVAILABILITY:
In all communities served for all types of non-residential service exceeding 50 kilowatts of billing demand, except outside lighting, standby, resale or other customers covered by special contracts. The customer's wiring must be so arranged that all service can be measured through one meter. If the customer does not connect his wiring into a single system, each meter shall constitute a separate billing unit.

RATE:
Base Rate: $15.00

Demand Charge: $5.00 per kilowatt of billing demand.

Energy Charge:

First	2,000 Kwh per month	6.262¢ per Kwh	(R)
Next	8,000 Kwh per month	4.937¢ per Kwh	|
Over	10,000 Kwh per month	4.467¢ per Kwh	(R)

MINIMUM BILL:
Base Rate.

PAYMENT:
Bills will be considered past due if not paid by the due date shown on the bill. Past due bills are subject to a late payment charge in accordance with the provisions of Rate 109 or any amendments or alterations thereto.

DETERMINATION OF BILLING DEMAND:
The demand in kilowatts for billing purposes shall be the greater of the maximum 15 minute measured demand in the current month or 50 Kw. Demands will be determined to the nearest one-tenth kilowatt. Customers whose loads have rapidly fluctuating and/or intermittent demand characteristics shall be subject to special rules and regulations.

POWER FACTOR CLAUSE:
The Company reserves the right to require the customer to install adequate equipment so that at all times it can operate its facilities to maintain a power factor between 90% lagging and 90% leading. If the customer operates outside this range, the maximum 15 minute integrated reactive kilovolt amperes in excess of 50% of the maximum 15 minute integrated kilowatt demand for the same month will be billed at $1.75 per Kvar of such excess demand.

(Continued)

Date Filed: June 27, 1988 Effective Date: Bills Rendered July 1, 1988

Issued By: C. Wayne Fox, Vice President - Regulatory Affairs & General Services

MONTANA-DAKOTA
UTILITIES CO.
A Division of MDU Resources Group, Inc.
400 North Fourth Street
Bismarck, ND 58501

STATE OF SOUTH DAKOTA
ELECTRIC RATE SCHEDULE

SD P.U.C. 1st Revised Sheet No. 5.4
Section No. 3
Cancelling ________ Sheet No. ________

(Continued)

LARGE GENERAL ELECTRIC SERVICE Rate 30 (N)

DISCOUNT FOR PRIMARY SERVICE:
A five percent discount shall be allowed if the customer provides his own transformers, related equipment and distribution facilities downstream of the meter, satisfactory to the Company, so that he can receive service and be metered at primary voltages of 2,400 volts or greater.

FUEL CLAUSE:
Bills are subject to an adjustment for cost of fuel as provided in Rate 58, or any amendments or alterations thereto.

SPECIAL TERMS AND CONDITIONS:

1. Architects, contractors and electricians should consult with the Company before proceeding to design or erect installations in which there will be a substantial electric load, to make sure their equipment will meet requirements and receive adequate service.

2. The foregoing schedule is subject to Rate 130 and any amendments or alterations thereto or additional rules and regulations promulgated by the Company under the laws of the state. (N)

Date Filed: May 16, 1986 Effective Date: June 1, 1986

Issued By: C. Wayne Fox, Vice President - Regulatory Affairs

FIRM SERVICE ECONOMIC DEVELOPMENT Rate 34 (N)

AVAILABILITY:
In all communities served for all types of general electric service which meets one of the following qualifications:

A) New Customers - An applicant with total expected demand of 400 Kw per month and usage of 1.5 million Kwh per year is eligible for service under this rate if it can meet any one of the following requirements: (i) its activities are largely or entirely different than that of the previous customer; (ii) that non-seasonal business has not been conducted at the premise for at least three billing periods prior to the application; (iii) that seasonal business has not been conducted at the premise for at least thirteen billing periods prior to the application; or (iv) the facility is newly constructed.

B) Existing Customers - An existing customer with increased demand of 400 Kw per month and increased usage of 1.5 million Kwh per year is eligible for service under this rate. Only the expanded portion of the facility will be eligible for the negotiated rate. In addition, the new load must be supplied from a separately metered circuit with separate metering equipment to be installed at the customer's expense. Average usage at the original facility must be at least as great as that which occurred in the previous 12 month period.

RATE:

Base Rate:	$15.00 per month.
Demand Charge:	$5.00 per Kw of billing demand.
Energy Charge:	Customer shall pay a negotiated rate not more than the ceiling nor less than the floor as specified below.

Ceiling	Floor
4.797¢ per Kwh	2.874¢ per Kwh

MINIMUM BILL:
Base Rate. (N)

(Continued)

FIRM SERVICE ECONOMIC DEVELOPMENT Rate 34 (N)

PAYMENT:
Bills will be considered past due if not paid by the due date shown on the bill. Past due bills are subject to a late payment charge in accordance with the provisions of Rate 109 or any amendments or alterations thereto.

FUEL CLAUSE:
Bills are subject to an adjustment for cost of fuel as provided in Rate 58, or any amendments or alterations thereto.

RIGHT TO REFUSE SERVICE:
The Company reserves the right to refuse applicants who have not previously signed a contract for service under this rate if it determines either system capacity or system energy supply is projected to be insufficient, or if service reliability is expected to be at jeopardy.

DETERMINATION OF BILLING DEMAND:
The demand in kilowatts for billing purposes shall be the greater of the maximum 15 minute measured demand in the current month or 400 Kw. Demands will be determined to the nearest one-tenth kilowatt. Customers whose loads have rapidly fluctuating and/or intermittent demand characteristics shall be subject to special rules and regulations.

POWER FACTOR CLAUSE:
The Company reserves the right to require the customer to install adequate equipment so that at all times it can operate its facilities to maintain a power factor between 90% lagging and 90% leading. If the customer operates outside this range, the maximum 15 minute integrated reactive kilovolt amperes (Kvar) in excess of 50% of the maximum 15 minute integrated kilowatt demand for the same month will be billed at $1.75 per Kvar of such excess demand.

SPECIAL TERMS AND CONDITIONS:
1. The customer and the Company shall execute a contract for service to be effective under this rate for a period of five years from the date of service commencement. (N)

(Continued)

FIRM SERVICE ECONOMIC DEVELOPMENT Rate 34 (N)

SPECIAL TERMS AND CONDITIONS: (Cont.)

2. The negotiated energy charge shall remain in effect for the first three years of the five-year period. At the beginning of the fourth year, the energy charge shall be increased by 25% of the difference between the negotiated rate and the ceiling rate. At the beginning of the fifth year, the energy charge shall be increased by 50% of the difference between the fourth year energy charge and the ceiling rate.

3. Upon expiration of the contract, the customer shall be served under the otherwise applicable rate schedule.

4. Architects, contractors and electricians should consult with the Company before proceeding to design or erect installations in which there will be a substantial electric load, to make sure their equipment will meet requirements and receive adequate service.

5. The foregoing schedule is subject to Rates 101 through 136 and any amendments or alterations thereto or additional rules and regulations promulgated by the Company under the laws of the state. (N)

ELECTRIC RATE SCHEDULE

NORTHWESTERN PUBLIC SERVICE COMPANY
HURON,
SOUTH DAKOTA 57350

Section No. 3
5th Revised Sheet No. 19
Cancelling 4th Revised Sheet No. 19

New Business Incentive Rider — OPTION N

CLASS OF SERVICE: Commercial and Industrial Service

APPLICABILITY

This rider is available to new Commercial and Industrial customers for new loads which represent minimum additional demand requirements of 5 KW or greater. The applicability of this rider is subject to consummation of an agreement between the Company and customer and shall be effective on a prospective basis only. Customers have primary responsibility for applying for service pursuant to this rider.

TERRITORY

Company's Assigned Service Area

RATE

Qualifying loads applicable to new customers shall be eligible for:

Non-Demand Accounts (Rate Nos. 21 & 25)

A 20% discount applicable to standard rates (exclusive of fuel cost) otherwise applicable based upon the Company's filed retail tariff for a period of two years.

Demand Accounts (Rate Nos. 33 & 34)

A 30% discount applicable to standard demand charges otherwise applicable based upon the Company's filed retail tariff for a period of five years.

plus

a bonus discount applicable to standard demand charges otherwise applicable based upon achieved load factors during the billing period as follows:

Achieved Load Factor	Bonus Discount
50%	20%
60%	30%
70%	40%
80%	50%

(Continued)

Date Filed: October 11, 1984 — Effective Date: October 15, 1984

Issued By: R. F. Leyenedecker
Manager-Rates & Regulation

ELECTRIC RATE SCHEDULE

NORTHWESTERN PUBLIC SERVICE COMPANY
HURON,
SOUTH DAKOTA 57350

Section No. 3
1st Revised Sheet No. 19.1
Cancelling Original Sheet No. 19.1

New Business Incentive Rider

OPTION N

(Continued)

OTHER PROVISIONS

1) The applicability of monthly customer and minimum charges, adjustment clauses and other provisions is unaffected by this rider. Stated provisions of tariff schedule under which load is being served shall remain in effect.

2) New customer load is defined as load being connected to the Company's system for the first time or re-established load that has been off service for a period of twelve months. In the event re-established load is under new ownership, the twelve month off service provision may be reduced or waived on a case by case basis at the Company's discretion.

3) This promotional rider is being offered as a result of a current capacity condition on the Company's system. The Company reserves reserves the right to reject customer loads for which sufficient capacity is not available or where said loads may otherwise jeopardize the Company's system or the welfare of existing customers.

Date Filed: October 11, 1984

Effective Date: October 15, 1984

Issued By: R. F. Leyendecker
Manager-Rates & Regulation

Increased Usage Incentive Rider — OPTION I

CLASS OF SERVICE: Commercial and Industrial Service

APPLICABILITY

This rider is available to existing Commercial and Industrial customers and is applicable to increased load requirements provided that such requirements are identifiable and represent minimum additional demand requirements of 5 KW or greater. The applicability of this rider is subject to consummation of an agreement between the Company and customer and shall be effective on a prospective basis only. Customers have primary responsibility for applying for service pursuant to this rider.

TERRITORY

Company's Assigned Service Area

RATE

Qualifying loads applicable to existing customers shall be eligible for:

Demand Accounts (Rate Nos. 33 & 34)

A 30% discount applicable to standard demand charges otherwise applicable based upon the Company's filed retail tariff for a period of five years.

plus

a bonus discount applicable to standard demand charges otherwise applicable based upon achieved load factors during the billing period as follows:

Achieved Load Factor	Bonus Discount
50%	20%
60%	30%
70%	40%
80%	50%

OTHER PROVISIONS

1) The applicability of monthly customer and minimum charges, adjustment clauses and other provisions is unaffected by this rider. Stated provisions of tariff schedule under which load is being served shall remain in effect.

(Continued)

Increased Usage Incentive Rider OPTION I

(Continued)

2) Qualifying additional load requirements shall be all requirements over the highest load requirement established after May 1, 1983, which was not affected by this promotional program.

3) This promotional rider is being offered as a result of a current capacity condition on the Company's system. The Company reserves the right to reject customer loads for which sufficient capacity is not available or where said loads may otherwise jeopardize the Company's system or the welfare of existing customers.

ECONOMIC DEVELOPMENT PROGRAM RIDER
(Experimental) ELECTRIC

1. Effective In

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

2. Availability

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

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

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

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

3. Load Applicable to the Rider

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

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

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

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

4. Rate

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

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

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

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

Marginal costs consists of the following cost components:

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

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

This pilot program is intended to be limited to a total annual level of discounts totaling no more than five million dollars on a cumulative annual basis during the pilot program period unless specifically authorized by the Commission to exceed that amount.

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

6. Contract & Enrollment Period

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

7. Affidavit Requirement

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

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

8. Sustained Operation Provision

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

9. Energy Efficiency and Demand Side Management Requirements

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

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

11. Qualifying Economic Development Programs:

State of Wisconsin Programs

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

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

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

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

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

Local or County Programs

Financial assistance from a local Revolving Loan Fund

Establishment of or location in a Tax Increment Financing District

Direct loan from a unit of local government

Construction of public facilities – roads, sewer, water – to serve a project

Site acquisition and clearance

Building renovation assistance

Federal Programs

Loan Guarantees

Grants

Investment Tax Credits

Income Tax Credits tied to New Hiring

Low-Interest Loans

Other, subject to Commission Approval

12. The Company's Reporting Requirements

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

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

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

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

GENERAL SERVICE/LARGE LIGHT AND POWER AREA DEVELOPMENT RIDER

TERRITORY

The General Service/Large Light and Power Area Development Rate (GS/LLP ADR) is available to eligible customers located in Area Development Zones designated by an authority or municipality (as defined in Minnesota Statutes Section 216B.161, Subd. 1) for development or redevelopment under the conditions set forth in the Statute.

A maximum of five (5) total Area Development Zones may exist at any time in contiguous or noncontiguous areas where other development incentives are offered by the authority or municipality in which the GS/LLP ADR is available.

APPLICATION

The GS/LLP ADR is available to new or expanding manufacturing or wholesale trade customers located in designated Area Development Zones. The customer must have total power requirements of at least 1,000 kW and less than 10,000 kW and the Company shall execute an Electric Service Agreement, having a minimum term of five (5) years with a minimum cancellation provision of one (1) year.

Service hereunder is subject to Company's Electric Service Regulations and any applicable Riders.

TYPE OF SERVICE

Single phase, three phase or single and three phase, 60 hertz, at one standard low voltage of 120/208 or 120/240 through and inclusive of 4160 volts; except that within the Low Voltage Network Area service shall be three phase, four wire, 60 hertz, 277/480 volts. Service may also be taken at a higher voltage subject to billing in conjunction with the High Voltage Service Adjustment.

RATE

All provisions of the Large Light and Power Service Schedule shall apply except as modified by the following.

Demand Charge:

The Demand Charge shall be billed at a percentage of the General Service or Large Light and Power Demand Charge for all kW of Billing Demand.

This percentage shall be as follows:

	Percentage of Demand Charge
Years 1-3	80%
Year 4	90%
Year 5 and beyond	100%

Filing Date November 2, 2009 MPUC Docket No. E015/GR-09-1151
Effective Date June 1, 2011 Order Date November 2, 2010

Approved by: Marcia A. Podratz
Marcia A. Podratz
Director - Rates

GENERAL SERVICE/LARGE LIGHT AND POWER AREA DEVELOPMENT RIDER

Energy Charges:

All energy usage shall be billed at the standard General Service or Large Light and Power Energy Charge.

SERVICE CONDITIONS

1. The rate contemplates that this service will utilize existing facilities with no additional major expenditures. Customer shall pay Company the installed cost of any additional required facilities which are not supported by this rate.

2. For service taken on this Rider, the Company will conduct an energy audit and inform the customer of the conservation programs available from the Company.

Filing Date November 2, 2009 MPUC Docket No. E015/GR-09-1151

Effective Date June 1, 2011 Order Date November 2, 2010

Approved by: Marcia A. Podratz
Marcia A. Podratz
Director - Rates

LARGE POWER AREA DEVELOPMENT RIDER

TERRITORY

The Large Power Area Development Rate (LPADR) is available to eligible customers located in Area Development Zones designated by an authority or municipality (as defined in Minnesota Statutes Section 216B.161, Subd. 1) for development or redevelopment under the conditions set forth in the Statute.

A maximum of five (5) total Area Development Zones may exist at any time in contiguous or noncontiguous areas where other development incentives are offered by the authority or municipality in which the LPADR is available.

APPLICATION

The LPADR is available to new or expanding manufacturing or wholesale trade customers located in designated Area Development Zones. The customer must have 10,000 kW or more total load and the Company shall execute an Electric Service Agreement, having a maximum term of ten (10) years with a minimum cancellation provision of four (4) years.

Service hereunder is subject to Company's Electric Service Regulations and any applicable Riders.

TYPE OF SERVICE

Three phase, 60 hertz, at Company's available transmission voltage of 115,000 volts. Service may also be taken at Company's available high voltage of 13,000 through 69,000 volts subject to billing in conjunction with a Service Voltage Adjustment.

RATE

All provisions of the Large Power Service Schedule shall apply except as modified by the following.

Demand Charge:

The first 10,000 kW of firm service shall be billed at a percentage of the Large Power Demand Charge for the first 10,000 kW or less of Firm Power Billing Demand. This percentage shall be as follows:

	Percentage of LP Demand Charge
Years 1-5	90%
Years 6-7	95%
Years 8-10	100%

All additional kW of firm service shall be billed at the Large Power Excess Power Demand Charge.

Filing Date May 2, 2008 MPUC Docket No. E015/GR-08-415
Effective Date October 1, 2009 Order Date August 10, 2009

Approved by: Marcia A. Podratz
Marcia A. Podratz
Director - Rates

LARGE POWER AREA DEVELOPMENT RIDER

Energy Charges:

All Firm Energy and Excess Energy usage shall be billed at the Large Power Firm Energy Charge.

SERVICE CONDITIONS

1. The rate contemplates that this service will utilize existing facilities with no additional major expenditures. Customer shall pay Company the installed cost of any additional required facilities which are not supported by this rate.

2. For service taken on this Rider, the Company will conduct an energy audit and inform the customer of the conservation programs available from the Company.

Attachments GM-3 and GM-4
have been deemed
"Highly Confidential"
in their entirety.