

Exhibit No.:
Issue: Tariff Issues
Witness: Tim M. Rush
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Kansas City Power & Light Company
Case No.: EO-2012-0141
Date Testimony Prepared: April 4, 2012

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EO-2012-0141

SURREBUTTAL TESTIMONY

OF

TIM M. RUSH

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

**Kansas City, Missouri
April 2012**

SURREBUTTAL TESTIMONY

OF

TIM M. RUSH

Case No. EO-2012-0141

1 **Q: Please state your name and business address.**

2 A: My name is Tim M. Rush. My business address is 1200 Main Street, Kansas City,
3 Missouri 64105.

4 **Q: Are you the same Tim M. Rush who prefiled rebuttal testimony in this matter?**

5 A: Yes.

6 **Q: What is the purpose of your surrebuttal testimony?**

7 A: I will respond to some of the issues raised in the rebuttal testimony of Staff witness
8 Michael S. Scheperle and in the December 7, 2011 Memorandum (Schedule MSS-2)
9 from the Electric Meter Variance Committee (“Committee”).

10 **Q: What did the Committee and the Missouri Public Service Commission Staff**
11 **(“Staff”) recommend?**

12 A: The Staff and the Committee recommended the Missouri Public Service Commission
13 (“Commission”) grant relief so that Kansas City Power & Light Company (“KCP&L” or
14 “Company”) can provide master metering to the Cathedral Square Corporation (“CSC”)
15 building located at 444 W. 12th Street in Kansas City, Missouri, so long as the building is
16 being operated by a IRC § 501(c)(3) qualified organization and used to provide
17 subsidized housing to low-income elderly and/or disabled individuals who pay fixed rent
18 inclusive of utilities.

1 **Q: What is the Electric Meter Variance Committee?**

2 A: It is a committee established by 4 CSR 240-20.050(5)(C) to address variance requests
3 made under this rule. Both Staff members and the Office of the Public Counsel serve on
4 this Committee.

5 **Q: Did Staff and the Committee determine that separate metering for residential units
6 at the Cathedral Square Towers building located at 444 W. 12th Street in Kansas
7 City, Missouri is not required by 4 CSR 240-20.050?**

8 A: Yes. The Staff and the Committee believe 4 CSR 240-20.050 does not apply in this
9 situation due to the age of the CSC building.

10 **Q: Does the Company agree that 4 CSR 240-20.050 does not apply in this instance?**

11 A: Yes, the Company agrees the building was built prior to June 1, 1981, and as such 4 CSR
12 240-20.050 does not apply.

13 **Q: Do KCP&L's tariffs allow KCP&L to provide electric service to CSC through one
14 master meter?**

15 A: Two of KCP&L's tariff provisions prevent the Company from providing electric service
16 to the residents of the CSC building through the use of a master meter, as individual
17 metering is required for multiple occupancy premises. The two subparts of KCP&L's
18 General Rules and Regulations tariff that relate to the master metering question are 5.01
19 and 5.03 attached as my surrebuttal testimony as Schedules TMR-5 and TMR-6.

20 **Q: Does Staff agree that KCP&L's tariffs prohibit it from providing service to CSC
21 through the use of a master meter?**

22 A: Yes. Staff and the Committee in its Memorandum, page 7 found, "Individual metering is
23 required by KCPL's Tariff Subparts 5.01 and 5.03 unless an exception exists. In this

1 case, no exception has been documented and KCPL’s tariff clearly provides that KCPL
2 may not serve the residents of the CSC facility through a master meter...”

3 **Q: You stated earlier that Staff and the Committee recommended the Commission**
4 **grant relief so that KCP&L can provide master metering to CSC. What was the**
5 **basis of that recommendation if Staff agrees the Company cannot offer master**
6 **metering due to its tariff?**

7 A: Staff and the Committee used a set of factors to reach their conclusions. As set forth in
8 the Memorandum, the factors are:

- 9 1. Is individual metering of the multiple-occupancy building required by
10 KCPL’s tariff Subpart 5.01 and 5.03?
- 11 2. Do the occupant(s) of each unit have control over a portion of the electric
12 energy used in such unit?
- 13 3. With respect to such portion of electric energy used in such unit, do the
14 long-run benefits to the electric consumers in such building exceed the
15 costs of purchasing and installing separate meters?
- 16 4. Would the granting of a variance be consistent with the goals of PURPA
17 to increase conservation of electric energy, increase efficiency in the use
18 of facilities and resources by electric utilities, and establish equitable retail
19 rates for electric consumers?
- 20 5. Would the granting of a variance be in the public interest because it
21 furthers a public policy objective in conjunction with other federal, state,
22 or local government programs, such as subsidizing housing costs for low-
23 income residents or promoting economic development in certain urban
24 areas?

25 **Q: What did Staff and the Committee find when applying these five factors?**

26 A: Factor 1. “Is individual metering of the multiple-occupancy building required by
27 KCPL’s tariff Subpart 5.01 and 5.03?” The conclusion as stated in Staff’s memorandum
28 was “yes”.

1 Factor 2. “Do the occupant(s) of each unit have control over a portion of the
2 electric energy used in such unit?” The conclusion as stated in Staff’s memorandum was
3 “yes”.

4 Factor 3. “With respect to such portion of electric energy used in such unit, do
5 the long-run benefits to the electric consumers in such building exceed the costs of
6 purchasing and installing separate meters?” The conclusion as stated in Staff’s
7 memorandum was “no”, “CSC neither maintains nor operates the meters. KCPL
8 maintains and operates the meters.”

9 Factor 4. “Would the granting of a variance be consistent with the goals of
10 PURPA to increase conservation of electric energy, increase efficiency in the use of
11 facilities and resources by electric utilities, and establish equitable retail rates for electric
12 consumers?” The conclusion in Staff’s memorandum was “Currently, the CSC building
13 is **in compliance with PURPA mandated policies** which are designed (1) to increase
14 conservation of electrical energy, (2) to increase efficiency in the use of facilities and
15 resources by electric utilities, and (3) equitable retail rates for electric consumers...
16 Granting of a variance will not necessarily increase or decrease conservation of electric
17 energy, or increase efficiency in the use of facilities and resources by electric utilities...
18 Granting a variance may be contrary to the goal of establishing equitable retail rates for
19 electric consumers.” (emphasis added)

20 Factor 5. “Would the granting of a variance be in the public interest because it
21 furthers a public policy objective in conjunction with other federal, state, or local
22 government programs, such as subsidizing housing costs for low-income residents or
23 promoting economic development in certain urban areas?” The conclusion in Staff’s

1 memorandum was “CSC is a non-profit corporation providing rental housing and related
2 facilities for lower income families and elderly and handicapped families and elderly and
3 handicapped persons pursuant to Section 202 of the National Housing Act.”

4 **Q: Do you believe these factors and the conclusions contained in Staff and the**
5 **Committee’s Memorandum support the recommendation to grant CSC the relief it**
6 **seeks?**

7 A: No. It appears that only one factor, Factor 5, supported Staff’s recommendation and
8 Factor 5 only supports the Staff’s recommendation by equating “public interest” with
9 “public policy”. In this instance, granting CSC’s request will ultimately result in higher
10 rates for other customers. Any reduction in the electric rates CSC pays is ultimately
11 borne by the Company’s remaining customers who may not agree a lower rate for CSC is
12 in the “public interest”.

13 **Q: Do other customers in KCP&L’s service territory have similar situations to CSC?**

14 A: I believe that other customers in KCP&L’s service territory are similarly-situated in that
15 they are individually metered and may offer similar services as does CSC.

16 **Q: Did the Staff or the Committee address the “un”availability of the Medium General**
17 **Service rate for CSC?**

18 A: No. Neither address the fact that the rate would not be available for CSC. As presented
19 by CSC, the main savings comes from utilizing the Medium General Service rate.
20 Simply adding up all of the metered usage and billing under the existing Residential
21 Service rate for master metered facilities does provide some very small savings, but the
22 primary savings comes from the rate change.

1 **Q: Why does the Medium General Service rate provide a lower rate than the**
2 **Residential Service rate for the same usage level?**

3 A: The reason for the difference is in the rate design and the usage characteristics of the
4 specific customer types. The Medium General Service rate is not designed for residential
5 customers and the data used in designing the rate did not include their usage profiles or
6 cost causation characteristics. By contrast, the rate that CSC currently pays, including
7 meter charges has been set by the Commission so that KCP&L can recover its investment
8 and ongoing costs to serve CSC's building.

9 **Q: Did Staff and the Committee present any other information in support of its**
10 **recommendations?**

11 A: Yes, beginning on page 9 of its Memorandum, Staff listed 6 additional considerations.
12 The considerations and the conclusions from the Memorandum are:

13 (1) Is the average age of the residents is well over 65 years, or the residents
14 are physically or mentally impaired or disabled?

15 **Finding:** The average age of the residents of the rental housing at CSC is
16 seventy-four (74) years with 160 residents in 156 units. There are thirty-one (31)
17 residents with physical disabilities and nineteen (19) mentally impaired.

18 (2) Does the facility make available assistance with incidental Activities of
19 Daily Living?

20 **Finding:** Numerous local organizations work closely with the CSC Service
21 Coordinator to meet the needs of residents such as homemaking services, blood
22 pressure checks, rides to and from appointments, and dinner's quarterly for
23 residents. Services include regular health clinics, all utilities included in rent
24 payment, high speed internet and cable available, controlled safety access, regular
25 van and bus trips to grocery and convenience stores, trash pickup, full
26 maintenance, laundry facilities, and numerous coordinated activities.

27 (3) Do the facilities have special design features to accommodate the elderly,
28 infirm or disabled?

29 **Finding:** Currently, there are 31 residents with physical disabilities (10 with
30 power chairs, 21 with walkers) and nineteen mentally impaired residents. Along

1 with incidental activities described in (2) above, a communal dining facility is
2 available to the residents, a large communal dining and resident's lounge, a large
3 communal kitchen, a large lobby, a large fitness room, a crafts room, and a
4 business center.

5 (4) Is communal dining provided to residents?

6 **Finding:** Communal dining is not provided on a daily basis; however, there is a
7 large dining area and kitchen where communal meals are prepared for parties and
8 on special occasions.

9 (5) Do communal living areas make up a portion of the facility?

10 **Finding:** Twenty-two percent of the facility involves the communal living area.
11 A significant portion includes a large communal dining and residents' lounge, a
12 large communal kitchen, a large lobby, a large fitness room, a crafts room, a
13 business center, and a putting green.

14 (6) Are the individual units relatively small?

15 **Finding:** There are 144 single bedroom units and 12 two-bedroom units with 525
16 sq. ft. for a one bedroom and 625 sq. ft. for a two-bedroom living area.

17 **Q: Are any of the factors or additional considerations used by Staff and the Committee**
18 **found or supported in any rule of the MPSC that you are aware of?**

19 A: Not that I am aware of. The Memorandum filed by Staff and the variance Committee
20 refers to a *Unanimous Stipulation and Agreement*, previously approved by the
21 Commission, granting a variance in Case Nos. EE-2004-0267 and EE-2004-0268 which
22 involved a variation from 4 CSR 240-20.050. Staff's *Suggestions in Support of the*
23 *Unanimous Stipulation and Agreement*, set forth six distinguishing characteristics which
24 formed the basis it used to ultimately reach a *Unanimous Stipulation and Agreement* in
25 both cases.

26 **Q: Was KCP&L a party to either of these cases?**

27 A: No. These were AmerenUE cases, and KCP&L was not a party to either case.

1 **Q: Has KCP&L agreed these factors and considerations should be used to determine**
2 **the outcome of this case or any case?**

3 A: No it has not.

4 **Q: Do you believe that these factors and considerations are appropriate for the request**
5 **by CSC?**

6 A: While I appreciate all of the work being performed at CSC, I am not sure how CSC's
7 charitable mission is itself a basis for granting CSC's variance from its tariffed rate. If
8 CSC ultimately ends up with a lower rate, then other customers' bills will need to
9 increase. The Commission must take into account the effect granting the variance will
10 have on other customers. Additionally, other residential facilities in KCP&L's service
11 territory may also want to finance the upgrade of their facilities in the same way that CSC
12 proposes. The Commission should consider how its decision in this case will encourage
13 similar requests and exacerbate rate switching.

14 **Q: What were Mr. Scheperle's rebuttal testimony findings as it pertains to CSC?**

15 A: Yes. Mr. Scheperle makes the following conclusions for CSC on page 2:

- 16 • Find it is in the public interest that KCPL provide master-metered electrical
17 service to [Cathedral Square Towers, located at 444 W. 12th Street in Kansas
18 City, Missouri (CST)] CST on the appropriate general rates so long as CST is
19 being operated by an Internal Revenue Code (IRC) § 501(c)(3) qualified
20 organization and used to provide subsidized housing to low-income elderly
21 and/or disabled individuals who pay fixed rent inclusive of utilities; and
22 • Implement that finding by ordering KCPL to revise its tariff to permit the
23 Commission to grant variances from KCPL's General Rules and Regulations

1 which require individual metering to residential units such as those at CST at
2 the request of KCPL, a customer of KCPL or a potential customer of KCPL
3 when it is in the public interest to do so and, after the tariff is revised, find that
4 service to CST qualifies for that variance.

5 **Q: Do you agree with the conclusions of the Staff?**

6 A: No, I do not. Staff’s recommendation indicates that CSC should receive the requested
7 master metering and be placed on the appropriate general service rate so long as they
8 meet certain qualifications. As I have pointed out in my rebuttal testimony, if CSC
9 becomes a master metered customer, it would not qualify for any of the general service
10 rates. This is because none of the general service rates are available for customers whose
11 primary use is for residential purposes. This is found in the “Availability” section of the
12 tariffs.

13 **Q: Staff’s recommendation also requests that the Commission should order KCP&L to**
14 **revise its tariff to permit the Commission to grant variances from KCP&L’s tariff,**
15 **which require individual metering to residential units. Why do you believe that**
16 **Staff is requesting a tariff be filed which allows variances in metering?**

17 A: As I have previously testified, I believe that a variance is required for CSC to be master
18 metered. I believe that it does not qualify for master metering without a variance. Both
19 the Company and customer have a substantial investment in the metering at CSC that was
20 installed when the facility was initially built. If this were a new facility being built today,
21 with all of the same conditions, it would be required that individual meters would be
22 required for each unit, unless a variance were filed and approved by the Commission.

1 This requirement is found in the Company's General Rules and Regulations under the
2 metering section 6.03, Sheet 1.22 which is attached as Schedule TMR-7.

3 **Q: Would other customers in the service territory qualify for similar treatment if a**
4 **variance were established as recommended by Staff?**

5 A: Yes. I suspect many other customers and facilities are similarly situated like CSC. As
6 stated in the metering section of the Company's General Rules and Regulations,
7 individual metering for residential customers has been required since June 1981. Prior to
8 1981, residential units either were individually metered, like CSC, or master metered, as
9 CSC is requesting.

10 **Q: If residential facilities prior to 1981 were master metered, what rate were they**
11 **placed on?**

12 A: They were placed on the residential rate with a multiplier for how many residential units
13 were connected to the meter. This is described in the residential tariff under the
14 "Availability" section. The provision became no longer available after June 1, 1981.
15 The section coincides with the metering section which requires individual meters for each
16 customer after June 1, 1981.

17 **Q: Do you have other residential customers who are master metered where**
18 **construction of the facility was before June 1, 1981?**

19 A: Yes.

20 **Q: What rate are these customers on?**

21 A: These customers are on the residential rate with a multiplier for the number of residential
22 units served beyond the meter.

1 **Q: If a variance for master metering CSC were granted, would it be possible for them**
2 **to be billed on the residential rate with a multiplier for the number of units?**

3 A: Since CSC was not served like this prior to June 1, 1981, I believe that a variance would
4 be required to establish the customer as a residential customer with a multiplier for the
5 number of units. This would be consistent with other apartments similarly situated.

6 **Q: So it appears that if a meter variance is allowed which provides CSC with master**
7 **metered service, then another variance is necessary to determine which rate is**
8 **appropriate for that service. Is this correct?**

9 A: Yes. I believe this to be correct. The General Service rates have two provisions (“For
10 electric service through one meter to a customer using electric service for purposes other
11 than those included in the availability provisions of the Residential Service Rate
12 Schedule.” “Service will not be supplied where the ultimate use is primarily for
13 residential purposes.”) that do not allow residential customers to qualify for the rate. See
14 Schedule TMR-1. The Residential rates have a provision for master metered facilities,
15 but limits availability to mastered metered building serviced as such prior to June 1,
16 1981. This was obviously set out that way because residential customers after June 1,
17 1981, required individual metering.

18 **Q: Do you support Staff’s recommendation that a tariff revision be made by KCP&L**
19 **so that tariff variances can be made?**

20 A: No. I believe that a variance can be granted by this Commission without a tariff
21 provision that sets out the criteria. The Company has been involved with numerous tariff
22 variance requests which have been approved by the Commission. Those variances are set

1 out on P.S.C. Mo. No. 2 Sheet 1.71. Each variance has its specific circumstances. I do
2 not believe a generic variance tariff is necessary.

3 **Q: Mr. Scheperle indicates that he has reviewed Mr. Flathman’s testimony and agrees**
4 **that CSC would qualify for the Medium General Service rate schedule if the**
5 **Commission allows service to be master metered. Do you agree?**

6 A: As I have previously stated, I do not agree. The Company’s General Service rate
7 schedules (Small, Medium, and Large) all state that the rates are not available to
8 customers where the primary use is for residential purposes.

9 **Q: Please summarize your surrebuttal testimony.**

10 A: The Company believes that the current metering and billing for CSC is consistent with all
11 of the existing tariffs of the Company and a variance should not be granted as good cause
12 for a variance has not been shown. Should the Commission determine that a variance
13 should be granted, KCP&L’s Medium General Service tariff would not apply. CSC’s
14 Application describes its facilities as “residential units”. KCP&L’s Medium General
15 Service tariff specifically states, “Service will not be supplied where the ultimate use is
16 primarily for residential purposes.” Whether or not CSC has one master meter as it has
17 requested or continues to receive service through individual meters for each unit, the only
18 tariff it qualifies for is Residential Service. Removing the existing meters will not change
19 the rate that CSC’s pays.

20 **Q: What do you recommend for CSC in this case?**

21 A: I believe that a meter variance is not appropriate in this case and that the customer is
22 being well served by the Company consistent with all other facilities similarly situated. I

1 believe that the request should be denied because CSC has not shown good cause for a
2 variance.

3 However, if the Commission believes that it is appropriate to provide a meter
4 variance which would allow CSC to be master metered, then I believe that another
5 variance is necessary to determine what rate this customer would be billed under. If the
6 meter variance were ordered, I believe that a variance should be granted for CSC to be
7 billed on the residential rate with a multiplier of the number of units. This would be
8 consistent with other similarly situated master metered facilities served prior to June 1,
9 1981.

10 **Q: Does that conclude your testimony?**

11 **A:** Yes, it does.

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

In the Matter of the Application of The)
Cathedral Square Corporation, a Missouri)
Non-Profit Corporation, For a Variance)
from Kansas City Power & Light)
Company's General Rules and Regulations)
Requiring Individual Metering)

Case No. EO-2012-0141

AFFIDAVIT OF TIM M. RUSH

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Tim M. Rush, being first duly sworn on his oath, states:

1. My name is Tim M. Rush. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Director, Regulatory Affairs.

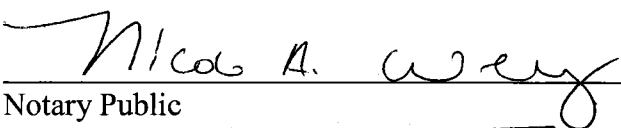
2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Kansas City Power & Light Company consisting of thirteen (13) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

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



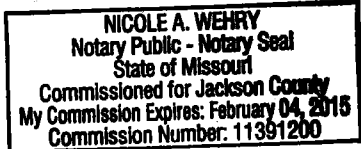
Tim M. Rush

Subscribed and sworn before me this 4th day of April, 2012.



Notary Public

My commission expires: Feb. 4, 2015



FORM NO. 13 P. S. C. MO. No. 2 Second { Original } SHEET No. 1.18
 Cancellng P. S. C. MO. No. 2 First { Original } SHEET No. 1.18
 KANSAS CITY POWER & LIGHT COMPANY For Rate Areas No. 1 and No. 3
 Name of Issuing Corporation or Municipality Community, Town or City

RECEIVED
 (continued)
 DEC 12 1980
 (continued)
 MISSOURI
 Public Service Commission

GENERAL RULES AND REGULATIONS
 APPLYING TO ELECTRIC SERVICE

4. TAKING ELECTRIC SERVICE

4.13 PRORATION OF DEMAND CHARGES: In the event the load requirements are temporarily curtailed or substantially reduced because of damage to or destruction of the Customer's premises or equipment due to an Act of God or because of a labor strike of the Customer's own employees employed at the premises of the Customer, the Company shall, upon request by the Customer, prorate the demand charges which would otherwise be applicable for the electric service supplied to the Customer during not more than six (6) months of curtailed or reduced load requirements of the Customer.

4.14 PARALLEL OPERATION: No Customer shall operate or permit operation of electric generating equipment in parallel with electric service supplied by the Company except as may be permitted under the Customer's service agreement.

5. MULTIPLE OCCUPANCY PREMISES

5.01 INDIVIDUAL METERING FOR SEPARATE PREMISES: Except as otherwise provided in this Rule 5, the occupant of each separate premises in or on any multiple occupancy premises will be individually metered and supplied electric service as the Customer of the Company, which electric service shall be utilized by the Customer only for operation of the Customer's installation located in or on the separate premises for which such electric service is supplied pursuant to the Customer's service agreement.

5.02 PUBLIC SERVICE METERING FOR LESSOR: All public service use in or on any multiple occupancy premises, where each separate premises therein is individually metered by the Company, will be separately metered and billed under an applicable non-residential rate schedule. Such public service use may include the electric requirements of all common areas and equipment in or on such multiple occupancy premises and the electric requirements of any separate premises therein occupied by the lessor or manager. Where, in any building used for residential purposes, the public service use consists solely of incidental hall or entrance way lighting, such public service use may for billing purposes be combined with the residential use of any separate premises therein so designated by the lessor.

FILED
 JAN 19 1981
 81 - 181
 Public Service Commission

KCPL FORM 81-101 (REV. 2/78)

DATE OF ISSUE December 5 1980 DATE EFFECTIVE January 19 1981
 month day year month day year

ISSUED BY L. C. Rasmussen Vice President 1330 Baltimore, Kansas City, Mo.
 name of officer title address

KANSAS CITY POWER & LIGHT COMPANY

Name of Issuing Corporation or Municipality

For Rate Areas No. 1 and No. 3

RECEIVED DEC 12 1980 MISSOURI Public Service Commission

GENERAL RULES AND REGULATIONS APPLYING TO ELECTRIC SERVICE

5. MULTIPLE OCCUPANCY PREMISES

5.03 RESALE AND DISTRIBUTION: Except as provided in Rules 5.05, 5.06 and 5.07 hereof, the Company will not supply electric service to a Customer for resale or redistribution by the Customer.

(a) "Resale" shall mean the furnishing of electric service by a Customer to another person under any arrangement whereby the Customer makes a specific or separate charge for the electric service so furnished, either in whole or in part, and whether the amount of such charge is determined by submetering, remetering, estimating or rebilling as an additional, flat, or excess charge, or otherwise.

(b) "Redistribution" shall mean the furnishing of electric service by the Customer (i) to another building occupied by the Customer and located on the same premises of the Customer but used by the Customer for a separate business enterprise, or (ii) to separate premises occupied by another person, whether or not such premises are owned, leased or controlled by the Customer, without making a specific or separate charge for the electric service so furnished. With respect to any multiple-occupancy premises, the Company will not supply electric service to the owner, lessee, or operator thereof, as the Customer of the Company, and permit redistribution by such Customer to his office or residential tenants therein, except for those premises being supplied such service on the effective date of this schedule. The restriction against "redistribution" may be waived by the Company where the operation of certain types of multiple occupancy premises, either in whole or in part, makes it impractical for the Company, in its judgment, to separately meter and supply electric service to each occupant as a Customer of the Company. Such exceptions may include:

(i) An operation catering predominantly to transients, such as hotels, motels, and hospitals;

(ii) An operation where the individual dwelling quarters are not equipped with kitchen and bathroom facilities, such as recognized rooming houses, dormitories, old folks' homes, orphanages and eleemosynary institutions;

(iii) An operation of a building used essentially for general office or commercial purposes where the separate premises leased to office or commercial tenants are adjustable and subject to rearrangement or relocation to conform to the needs of the tenants and the Company.

FILED JAN 19 1981 Public Service Commission

KCPL FORM 61-101, REV. 2/781

DATE OF ISSUE December 5 1980

DATE EFFECTIVE January 19 1981

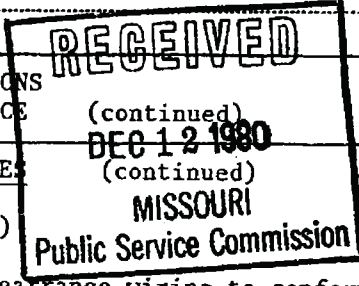
ISSUED BY L. C. Rasmussen

Vice President

1330 Baltimore, Kansas City, Mo.

KANSAS CITY POWER & LIGHT COMPANY

Name of Issuing Corporation or Municipality



GENERAL RULES AND REGULATIONS APPLYING TO ELECTRIC SERVICE

MULTIPLE OCCUPANCY PREMISES

5.03 RESALE AND REDISTRIBUTION: (continued)

deems it would be impractical to rearrange wiring to conform to any such changes;

- (iv) An operation of a transient mobile home court (see Rule 14.02) where electric service is supplied by the Company to the operator, as the Customer of the Company, pursuant to an applicable rule or rate schedule of the Company.

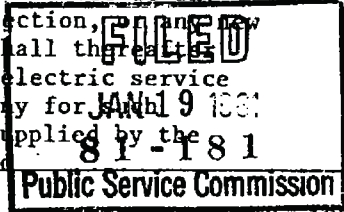
In cases where redistribution is permitted under this Rule 5.03, the Company will supply electric service to the owner, lessee, or operator of such multiple occupancy premises, as the Customer of the Company, under an applicable rate schedule and the Customer may, by redistribution, furnish electric service to his tenants in or on such multiple occupancy premises on a rent inclusion basis; i.e., as an incident of the tenancy and without a specific or separate charge for the electric service so furnished by the Customer to his tenant, or a variable rental on account thereof.

KCPL FORM 81-101 REV. 2/78

5.04 RENT INCLUSION BY LESSOR: Any lessor of a multiple occupancy premise may, by prior arrangement with the Company, elect to receive, and pay to the Company, the electric service bills of his tenants in such premises whose separate premises therein are individually metered and supplied electric service by the Company, provided that each such tenancy includes electric service on a rent inclusion basis. Under such an arrangement the Company may consider the lessor as the Customer for billing and collection purposes but shall individually meter the separate premises of each such tenant.

5.05 PRESENT RESALE PRACTICES: In those few instances where on January 10, 1966, a Customer was engaged, as the lessor of multiple occupancy premises, in the resale of electric service to his tenants therein, such practice as established by the Customer and in effect on January 10, 1966, shall be permitted to continue; provided that,

- (a) if such electric service to the Customer is terminated at any time for any reason, the Customer, upon reconnection, shall charge each tenant therein no more for resale electric service than such tenant would be charged by the Company for electric service if individually metered and supplied by the Company to such tenant's separate premises; and



DATE OF ISSUE December 5 1980 month day year

DATE EFFECTIVE January 19 1981 month day year

ISSUED BY L. C. Rasmussen name of officer

Vice President title

1330 Baltimore, Kansas City, Mo. address

FORM NO. 13

P. S. C. MO. No. 2

Fifth { Original Revised } SHEET No. 1.22

Cancelling P. S. C. MO. No. 2

Fourth { Original Revised } SHEET No. 1.22

KANSAS CITY POWER & LIGHT COMPANY
Name of Issuing Corporation or Municipality

For Rate Area No. 1-Urban Area & Community, Town or City

Rate Area No. 3-Suburban Area

RECEIVED

GENERAL RULES AND REGULATIONS APPLYING TO ELECTRIC SERVICE

(Continued) 1994

6. METERING

(continued)

MO. PUBLIC SERVICE COMM.

6.01 METER INSTALLATION: (continued)

Nothing in the preceding sentence shall preclude the Company, on its own initiative, from relocating meters at the Company's expense when such relocation becomes necessary as a result of changes in Company's operating practices.

6.02 MULTIPLE METERING: When more than one meter installation is used to measure the electric service supplied by the Company to a customer, a separate bill in accordance with the applicable rate schedule will be rendered for the electric service supplied through each meter installation. The Company may combine consumption of electric service registered, and render a single bill, for the same class of electric service supplied to a Customer at his premises through two or more meter installations if, at the option of the Company, such multiple metering is installed as a convenience to the Company or because it is more economical for the Company to do so.

6.03 MULTIPLE-OCCUPANCY BUILDINGS: When a building, construction of which began after June 1, 1981, is occupied by more than one Customer, the Company will set as many meters as there are separate Customers within the building, and will furnish electric service conductors to the building sufficient to supply the requirements of all Customers within the building. The internal building wiring and meter board shall be so arranged as to permit individual metering of each separate premises and the installation of the Company's meters immediately adjacent to each other.

6.04 METER READING: The Company uses the plan of continuous cycle meter reading in its service territory which is divided into meter reading districts. Except as otherwise provided herein or in applicable rate schedules of the Company, each meter in each such district will be read monthly on or about the same day of the month, and such readings shall be the basis for the Company's billing for electric service during the period ending with the latter reading. The Company reserves the right to redesignate meter reading districts. If the Company changes a meter reading district and the change results in a change of nine (9) days or more in a billing cycle, notice will be given to each affected customer at least 15 days prior to the date the affected customers receive a bill based on the new cycle. Residential customers whose meters are inaccessible for normal reading may contact the Company and make appointment for a special reading on a Saturday or prior to 9:00 p.m. on a weekday.

FILED

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MISSOURI Public Service Commission

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ISSUED BY S. W. Catron Vice President 1201 Walnut, Kansas City, Mo.

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