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Vice Chair

Missouri Public Service Commission

POST OFFICE BOX 360  
JEFFERSON CITY, MISSOURI 65102  
573-751-3234  
573-751-1847 (Fax Number)  
<http://www.ecodev.state.mo.us/psc/>

April 12, 2000

BRIAN D. KINKADE  
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Director, Utility Services

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Secretary/Chief Regulatory Law Judge

DANA K. JOYCE  
General Counsel

FILED

APR 12 2000

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**RE: Case No. ET-2000-612 – In the Matter of Kansas City Power & Light Company Tariff Sheets Regarding a Revised Voluntary Load Reduction Rider, Schedule VLR and a Revised Peak Load Curtailment Credit Rider, Schedule PLCC**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **STAFF RECOMMENDATION FOR EXPEDITED APPROVAL OF KCPL'S PROPOSED PEAK LOAD CURTAILMENT CREDIT RIDER – SCHEDULE PLCC AND VOLUNTARY LOAD REDUCTION RIDER – SCHEDULE VLR.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Steven Dottheim  
Chief Deputy General Counsel  
(573) 751-7489  
(573) 751-9285 (Fax)

Enclosure

cc: Counsel of Record

FILED

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

APR 12 2000

Missouri Public  
Service Commission

In the Matter of Kansas City Power & )  
Light Company Tariff Sheets Regarding a )  
Revised Voluntary Load Reduction Rider, )  
Schedule VLR and a Revised Peak Load )  
Curtailment Credit Rider, Schedule PLCC. )

Case No. ET-2000-612

**STAFF RECOMMENDATION FOR EXPEDITED APPROVAL OF KCPL'S  
PROPOSED PEAK LOAD CURTAILMENT CREDIT RIDER – SCHEDULE PLCC  
AND VOLUNTARY LOAD REDUCTION RIDER – SCHEDULE VLR**

Comes now the Missouri Public Service Commission Staff (Staff) and files the instant Staff Recommendation (Appendix A) that the Missouri Public Service Commission (Commission) issue an Order granting expedited approval of Kansas City Power & Light Company's (KCPL's) proposed Peak Load Curtailment Credit Rider – Schedule PLCC and Voluntary Load Reduction Rider – Schedule VLR. Since this tariff sheet filing requested expedited treatment, the Commission created a case file pursuant to 4 CSR 240-2.065(2). An Order of the Commission is necessary to indicate expedited approval and to establish an expedited effective date of the tariff sheets. The Staff is not aware of any other matter before the Commission that affects or is affected by this filing. Pursuant to Section 393.140(11) RSMo 1994, the Commission may allow tariff sheets to become effective with less than thirty (30) days for good cause shown. The Staff believes that allowing as much time as possible for communication with potential customers prior to the beginning of the upcoming curtailment season is good cause for authorizing the tariff sheets to become effective with less than thirty (30) days notice. In support of the Staff's recommendation, the Staff states as follows:

1. On February 29, 2000, KCPL filed proposed changes to its Peak Load Curtailment Credit Rider – Schedule PLCC and its Voluntary Load Reduction Rider-

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Schedule VLR in Tariff File No. 200000782 to become effective March 30, 2000, but withdrew that filing on March 29, 2000 at the request of the Missouri Public Service Commission Staff (Staff) in order to modify one of its proposed changes. KCPL's filing is designed to revise both the Peak Load Curtailment Credit Rider - Schedule PLCC and the Voluntary Load Reduction Rider - Schedule VLR in anticipation of conditions during the upcoming summer season.

2. Among the modifications proposed to the Peak Load Curtailment Credit Rider - Schedule PLCC are the following:

- (a) Eliminate the three-year contract option; however customers with existing three-year contracts will continue to be served under those contracts for the remainder of the three-year contract term. Customers with three-year contracts will also have the option of converting to a one-year contract.
- (b) Increase in the monthly curtailment credit per kW of curtailable load.
- (c) Charges for a customers' failure to curtail its load to its contracted firm power level are simplified.
- (d) Curtailment season changed to May 16 through September 15, which is the time period of greatest capacity and energy supply risk for KCPL and also matches the definition of summer on the general rate schedules.

3. Among the modifications proposed to the Voluntary Load Reduction Rider - Schedule VLR are the following:

- (a) Revision of the calculation of the amount of kWh to which the Load Reduction Credit will be applied. The revision will allow the customer to know in advance the load level from which its load reduction will be calculated.
- (b) Elimination of the implicit penalty that resulted if the calculation of the customer's load reduction in one voluntary curtailment period resulted in a negative load reduction, i.e., the customer's load actually increased, and was used to offset load reductions in another voluntary curtailment period during the same billing month.

- (c) Section added for the Special Provisions for Customers Served on Schedule PLCC, which describes the combined operation of Schedule PLCC and Schedule VLR when a customer is served under both Riders.

4. The Electric-Rates & Tariffs Staff has reviewed KCPL's filing and recommends that the Commission approve the following tariff sheets, as filed on March 29, 2000, to go into effect for service on and after the earliest possible effective date:

P.S.C. MO. No. 7

Third Revised	SHEET No. 21,	Cancelling Second Revised SHEET No. 21
Third Revised	SHEET No. 21A,	Cancelling Second Revised SHEET No. 21A
Third Revised	SHEET No. 21B,	Cancelling Second Revised SHEET No. 21B
Third Revised	SHEET No. 21C,	Cancelling Second Revised SHEET No. 21C
Third Revised	SHEET No. 21D,	Cancelling Second Revised SHEET No. 21D
Third Revised	SHEET No. 21E,	Cancelling Second Revised SHEET No. 21E
First Revised	SHEET No. 21F,	Cancelling Original SHEET No. 21F
Fourth Revised	SHEET No. 27,	Cancelling Third Revised SHEET No. 27
Third Revised	SHEET No. 27A,	Cancelling Second Revised SHEET No. 27A
First Revised	SHEET No. 27B,	Cancelling Original SHEET No. 27B
Original	SHEET No. 27C	

Wherefore, for the above stated reasons, the Staff recommends that the Commission issue an Order granting expedited approval of Kansas City Power & Light Company's proposed revised Peak Load Curtailment Credit Rider – Schedule PLCC and Voluntary Load Reduction Rider – Schedule VLR and establish an effective date for said tariff sheets with less than thirty (30) days notice for good cause shown, pursuant to Section 393.140(11) RSMo 1994.

Respectfully submitted,

DANA K. JOYCE

General Counsel




Steven Dottheim  
Chief Deputy General Counsel  
Missouri Bar No. 29149

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-7489 (Telephone)  
(573) 751-9285 (Fax)

**Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 12th day of April 2000.

  
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## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
Case No. ET-2000-612, File No. 200000883,  
Kansas City Power & Light Company

FROM: James Watkins, Regulatory Economist III, Project Coordinator  
Mack McDuffey, Rate & Tariff Examiner II <sup>MM</sup>

James Watkins 4/3/2000      Steven D. [Signature] 4/12/00  
Project Coordinator / Date      General Counsel's Office / Date

SUBJECT: Staff Recommendation for **Approval** of Tariff Sheets Filed to Modify the Peak Load Curtailment Credit Rider-Schedule PLCC and the Voluntary Load Reduction Rider-Schedule VLR

DATE: April 3, 2000

On March 29, 2000, Kansas City Power & Light Company (KCPL or Company) of Kansas City, Missouri filed eleven (11) tariff sheets bearing an effective date of April 29, 2000; however, **expedited treatment** is requested. (Although an expedited effective date is requested by KCPL, a specific expedited effective date is not identified by KCPL.) On February 29, 2000, the Company filed proposed changes to its Peak Load Curtailment Credit Rider-Schedule PLCC and its Voluntary Load Reduction Rider-Schedule VLR in Tariff File No. 200000782 to become effective March 30, 2000, but withdrew that filing on March 29, 2000 at the request of the Missouri Public Service Commission Staff (Staff) in order to modify one of its proposed changes. This filing is designed to revise both the Peak Load Curtailment Credit Rider-Schedule PLCC and the Voluntary Load Reduction Rider-Schedule VLR in anticipation of conditions during the upcoming summer season.

The following modifications are being proposed to the Peak Load Curtailment Credit Rider:

1. Service to all customers will be consolidated under the same credit and curtailment parameters with only one-year contracts available. An Option Two was initiated effective May 8, 1999 to add a one-year contract option to the previously offered three-year contract. The proposed changes to Schedule PLCC will eliminate the three-year contract option; however customers with existing three-year contracts will, at the option of the customer, continue to be served under those contracts for the remainder of the three-year contract term. Customers with three-year contracts will also have the option of converting to a one-year contract.
2. The monthly Curtailment Credit per kW of curtailable load is increased from \$5 for Option One and \$7 for Option Two to \$10 for all customers.

3. The Penalties for a customer's failure to curtail its load to its contracted Firm Power Level on one or more occasions are simplified from loss of credit and a \$4 per kW charge for the first occurrence, plus a \$4 per kW charge for the second and subsequent occurrences to a single \$10 per kWh charge for each occurrence. The basis of the \$4 per kW penalty charge was the monthly credit of \$4 per kW that was in effect prior to May 9, 1999. The proposed monthly credit of \$10 per kW is the basis of the proposed penalty charge.
4. The Curtailment season is changed from June 1 through September 30 for Option One and May 1 through September 30 for Option Two to May 16 through September 15, which is the time period of greatest capacity and energy supply risk for KCPL and also matches the definition of summer on the general rate schedules.
5. The Voluntary Curtailment section is changed to refer to the Special Provisions for Customers Served on Schedule PLCC section of the Voluntary Load Reduction Rider-Schedule VLR.

The following modifications are being proposed to the Voluntary Load Reduction Rider:

1. The calculation of the amount of kWh to which the Load Reduction Credit will be applied will be based on the difference between actual load and 90% of the average of the Monthly Maximum Demands used in billing the four summer months of the immediately preceding summer, rather than being based on 80% of the previous day's peak. This revision will allow the customer to know in advance the load level from which its load reduction will be calculated.
2. The netting of the kWh of Load Reduction (both positive and negative) over the entire billing month has been changed to a netting of the kWh of Load Reduction only over each curtailment period in order to eliminate the implicit penalty that resulted if the calculation of the customer's load reduction in one voluntary curtailment period resulted in a negative load reduction, i.e., the customer's load actually increased, and was used to offset load reductions in another voluntary curtailment period during the same billing month.
3. A section was added for the Special Provisions for Customers Served on Schedule PLCC, which describes the combined operation of Schedule PLCC and Schedule VLR when a customer is served under both Riders.

The Missouri Public Service Commission Electric-Rates & Tariffs Staff has reviewed this filing and recommends approving the following tariff sheets, as filed on March 29, 2000, to go into effect for service on and after the earliest possible effective date:

P.S.C. MO. No. 7

Third Revised	SHEET No. 21, Cancelling Second Revised	SHEET No. 21
Third Revised	SHEET No. 21A, Cancelling Second Revised	SHEET No. 21A
Third Revised	SHEET No. 21B, Cancelling Second Revised	SHEET No. 21B
Third Revised	SHEET No. 21C, Cancelling Second Revised	SHEET No. 21C
Third Revised	SHEET No. 21D, Cancelling Second Revised	SHEET No. 21D
Third Revised	SHEET No. 21E, Cancelling Second Revised	SHEET No. 21E
First Revised	SHEET No. 21F, Cancelling Original	SHEET No. 21F
Fourth Revised	SHEET No. 27, Cancelling Third Revised	SHEET No. 27
Third Revised	SHEET No. 27A, Cancelling Second Revised	SHEET No. 27A
First Revised	SHEET No. 27B, Cancelling Original	SHEET No. 27B
Original	SHEET No. 27C	

Because this filing requested expedited treatment, the Commission created a case file pursuant to 4 CSR 240-2.065(2). As a consequence, an order is necessary to indicate approval and to establish the effective date of the tariff sheets. The Staff is not aware of any other matter before the Commission that affects or is affected by this filing. The Staff believes that allowing adequate time for communication with potential customers prior to the beginning of the curtailment season is good cause, pursuant to Section 393.140(11) RSMo 1994, for allowing the tariff sheets to become effective in less than thirty (30) days.

copies:      Director - Utility Operations Division  
                 Director - Research and Public Affairs Division  
                 Director - Utility Services Division  
                 General Counsel  
                 Manager - Financial Analysis Department  
                 Manager - Accounting Department  
                 Manager - Electric Department  
                 Charles Locke, Senior Regulatory Analyst, KCPL  
                 Office of the Public Counsel



**Service List for  
Case No. ET-2000-612  
April 12, 2000**

John Coffman  
Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

William Riggins  
Kansas City Power & Light  
1201 Walnut, P.O. Box 418679  
Kansas City, MO 64106-2124