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Company
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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2022-0130

DIRECT TESTIMONY

OF

MARISOL E. MILLER

ON BEHALF OF

EVERGY MISSOURI WEST

**Kansas City, Missouri
January 2022**

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DIRECT TESTIMONY

OF

MARISOL E. MILLER

Case No. ER-2022-0130

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

2 A: My name is Marisol E. Miller. My business address is 1200 Main, Kansas City, Missouri
3 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Evergy Metro, Inc. I serve as Senior Manager – Regulatory Affairs for
6 Evergy Metro, Inc. d/b/a as Evergy Missouri Metro (“Evergy Missouri Metro”), Evergy
7 Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”), Evergy
8 Metro, Inc. d/b/a Evergy Kansas Metro (“Evergy Kansas Metro”), and Evergy Kansas
9 Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central
10 (“Evergy Kansas Central”) the operating utilities of Evergy, Inc.

11 **Q: On whose behalf are you testifying?**

12 A: I am testifying on behalf of Evergy Missouri West.

13 **Q: What are your responsibilities?**

14 A: My general responsibilities are to provide support for the Company’s regulatory activities
15 in the Missouri and Kansas jurisdictions. Specifically, my duties include oversight of
16 class cost of service, tariff management, load analysis, and rate design. I also manage
17 certain analytical activities for the department including rate change implementation,
18 billing determinant calculation, and retail revenue calculation.

1 **Q: Please describe your education, experience and employment history.**

2 A: I hold a Master of Business Administration degree from Rockhurst University with an
3 emphasis in Management. I also was awarded a Bachelor of Science in Business
4 Administration Magna Cum Laude with an emphasis in Business Finance and
5 Banking/Financial Markets from the University of Nebraska at Omaha. In addition to
6 those academic credentials, the Institute of Internal Auditor's ("IIA") and the Association
7 of Certified Fraud Examiners ("ACFE") have certified me as a Certified Internal Auditor
8 and Certified Fraud Examiner respectively.

9 I've worked in various roles in Financial Analysis, Financial Reporting, and
10 Internal Auditing. I joined KCP&L (now Evergy) in August of 2006 working as a
11 Senior/Lead Internal Auditor. I led various projects of increasing complexity and most
12 notably was the on-site Internal Auditor for the approximately \$2 billion Comprehensive
13 Energy Plan Iatan 2 Construction project.

14 I have worked in the Regulatory Affairs Department since 2011 holding various
15 positions covering areas including Integrated Resource Planning ("IRP"), Missouri
16 Energy Efficiency Investment Act ("MEEIA")/Demand-Side Management ("DSM"),
17 compliance reporting for multiple areas in transmission and delivery, and rate case
18 support.

19 **Q: Have you previously testified in a proceeding before the Missouri Public Service**
20 **Commission ("Commission" or "MPSC") or before any other utility regulatory**
21 **agency?**

22 A: Yes, I provided written testimony before the Kansas Corporation Commission ("KCC")
23 and provided written testimony and testified in a rate case proceeding before the MPSC.

1 **Q: What is the purpose of your testimony?**

2 A: The purpose of my testimony is to:

3 I. Highlight and explain changes impacting rates resulting from rate studies and
4 planning.

5 a. Real Time Pricing (RTP) Alternative

6 b. Rate Clean up

7 i. Residential

8 1. Eliminate Other Rate (MORO) and transition customers to
9 Residential Standard (MORG)

10 2. Eliminate the frozen Time of Day rate (MO610)

11 ii. Non-Residential

12 1. Eliminate frozen Separately Metered Heat Rate (MOSHS) and
13 transition customers to Standard General Use Rate (MOSGS or
14 MOSDS)

15 2. Eliminate the frozen Time of Day rate (MO620, MO630,
16 MO640) and transition customers to the applicable Non-
17 Residential Standard Rate

18 c. Studies underway & Potential plans for the future

19 i. Bright Lines

20 ii. Hours Use

21 II. Explain and support the Company's annualized/normalized revenues;

22 III. Explain the Electric Class Cost of Service ("CCOS") Study; and

23 IV. Explain and support the Company's Electric Rate Design.

1 I. CHANGES RESULTING FROM RATE STUDIES

2 Q: Were there any studies completed that impacted change to revenues or rate design
3 proposed in this case?

4 A: Yes. The Company performed a number of studies as part of commitments made in the
5 last general rate case that provided insight into the value of rate consolidation and
6 simplification. The proposals included herein are also part of a broader Rate
7 Modernization Plan (“Rate Plan”) that will expand programs and rates offered to our
8 customers. For more details on the Company’s Rate Plan goals and objectives, as well
9 as, the studies and commitments completed, please see the Direct testimony of Company
10 witness Bradley D. Lutz. My testimony will focus on the proposals resulting from those
11 studies and reviews.

12 Q: What proposals are being made as part of this filing that resulted from studies or
13 planning?

14 A: The following proposals are being made in this filing resulting from studies:

- 15 • Real Time Pricing (RTP) alternative (Commercial & Industrial) (frozen)
- 16 • Elimination of certain rates or rate provisions
 - 17 ○ Residential
 - 18 ▪ Residential Other
 - 19 ▪ Residential Time of Day (TOD) (frozen)
 - 20 ○ Non-Residential
 - 21 ▪ Separately Metered Heat Rate (Small General Service) (frozen)
 - 22 ▪ Time of Day (General Service) (frozen)

1 **Q: Are there other rate changes that you will discuss in your testimony?**

2 A: Yes, I will also discuss studies that are currently underway that explore a potential future
3 change that would impact our Commercial & Industrial classes. The two studies cover
4 the calculation of Hours Use utilized in the energy charge calculation and the
5 establishment of “bright lines” for demands. The intention in discussing these studies
6 now is to collect feedback to inform a future case where these study results will be used
7 to propose potential changes to the energy charge calculation and class demand
8 thresholds.

9 **Q: Can you provide a bit of background and detail on each proposal starting with the**
10 **proposal for RTP?**

11 A: The Company worked with consulting firm, Concentric Energy Advisors, to design a rate
12 option that leveraged real world examples in the industry, offered price signals that
13 aligned with market pricing, and that worked with Evergy’s billing system. The result
14 was an hourly rate that melds the predictability of static time variant rates with a
15 reflection of market energy price fluctuations. The rate will offer flexibility and
16 predictability that will allow customers to modify their operations to take advantage of
17 reduced cost hours. This offering is a result of a rate case commitment in the last general
18 rate cases. For more details on the commitment and background, please see the Direct
19 testimony of Company witness Bradley D. Lutz.

20 **Q: What is the recommendation and what analysis has been performed to support the**
21 **it?**

22 A: Utilizing the current Class Cost of Service study, functionalized costs were identified for
23 use in a time-sensitive model for replacement of the RTP tariff. Costs which vary by

1 season (summer versus non-summer) and day type (weekday versus weekend) were
2 identified for temporal allocation. Excess production demand costs were slated for
3 allocation to hours within 90% of System peak, and Energy-related costs were slated for
4 allocation based on locational marginal prices. Average production demand costs, which
5 also possess a time element, were slated for application to all hours. Though
6 Transmission demand costs are not temporal, they are covered in normal rates by the
7 regular demand charge and were thus also slated for application equally to all hours.
8 Distribution demand costs and Customer-related costs were deemed non-temporal. These
9 costs are currently handled via the Facilities Demand Charge (variable by kW) and
10 Customer Charge (per customer,) respectively, within the normal general service tariff
11 rates, and were thus treated accordingly in this proposed rate design and excluded from
12 the hourly considerations. Next, system hourly cost patterns were identified. Prior year
13 day-ahead locational marginal price (“LMP”) data was analyzed to identify high and low-
14 cost hours by season and day type. System hourly load data was also analyzed to identify
15 the hours that are the drivers of peak demand and associated costs. Utilizing these
16 findings, the identified time-variable costs were allocated by hour. Once the various
17 functional costs were allocated to the different temporal and non-temporal components,
18 rates were designed to be revenue neutral for each rate class. The resulting structure is
19 composed of three distinct components: hourly energy charge variable by season and day
20 type; facilities demand charge; and customer charge. This new structure continues to
21 preserve the time-based components inherent in the current RTP rate structure, provide
22 appropriate price signals for efficient usage, provide a means for customers to modify
23 usage to reduce costs, and will work with the Company’s billing system. The new rate

will be available on a limited basis to customers meeting specific load requirements typical of current Large Power Service and Large General Service customers. It is intended that the rate will be broadened further to allow for greater participation in a future case leveraging learnings from this initial offering. See the following table for the pricing being offered as part of this proposal, Schedule MEM-3 for RTP Alternative report, and tariff TRP filed in this case.

Table 1- Time Related Pricing

L

Large General Service – level rates:

	Secondary	Primary
Customer Charge (\$/month)	\$79.28	\$260.80
Facilities Charge (\$/kW)	\$2.426	\$1.571

Hourly Energy Charge (\$/kWh)

Hour Ending	Summer Weekday	Non-Summer Weekday	Summer Weekend	Non-Summer Weekend
1	\$0.04170	\$0.04970	\$0.04147	\$0.06012
2	\$0.03794	\$0.04744	\$0.03849	\$0.05748
3	\$0.03610	\$0.04723	\$0.03644	\$0.05518
4	\$0.03540	\$0.04778	\$0.03558	\$0.05578
5	\$0.03806	\$0.05181	\$0.03637	\$0.05901
6	\$0.04367	\$0.06147	\$0.03888	\$0.06413
7	\$0.04945	\$0.07851	\$0.04094	\$0.06964
8	\$0.05293	\$0.08085	\$0.04530	\$0.07699
9	\$0.05831	\$0.07896	\$0.05005	\$0.08521
10	\$0.06122	\$0.08201	\$0.05297	\$0.09233
11	\$0.06708	\$0.07808	\$0.05657	\$0.08785
12	\$0.07490	\$0.07380	\$0.06293	\$0.08253
13	\$0.08168	\$0.07128	\$0.06900	\$0.07906
14	\$0.09657	\$0.07047	\$0.07348	\$0.07647
15	\$0.11471	\$0.06826	\$0.08421	\$0.07557
16	\$0.14165	\$0.06702	\$0.08981	\$0.07592
17	\$0.15267	\$0.06974	\$0.09278	\$0.07971
18	\$0.13886	\$0.07728	\$0.08734	\$0.08998
19	\$0.10803	\$0.07873	\$0.07805	\$0.09179

20	\$0.09109	\$0.07676	\$0.07118	\$0.08908
21	\$0.07028	\$0.07479	\$0.05618	\$0.08509
22	\$0.05714	\$0.06495	\$0.05153	\$0.07547
23	\$0.05008	\$0.05758	\$0.04576	\$0.06687
24	\$0.04439	\$0.04969	\$0.04137	\$0.05824

1

2

Large Power Service – level rates:

Customer Charge (\$/month)	\$717.99
Facilities Charge (\$/kW)	
Secondary	\$3.425
Primary	\$2.992
Substation	\$0.000
Transmission	\$0.000

3

Hourly Energy Charge (\$/kWh)				
Hour Ending	Summer Weekday	Non-Summer Weekday	Summer Weekend	Non-Summer Weekend
1	\$0.03698	\$0.04284	\$0.03444	\$0.04763
2	\$0.03325	\$0.04075	\$0.03177	\$0.04549
3	\$0.03142	\$0.04055	\$0.02993	\$0.04362
4	\$0.03073	\$0.04107	\$0.02917	\$0.04410
5	\$0.03337	\$0.04480	\$0.02987	\$0.04673
6	\$0.03894	\$0.05377	\$0.03212	\$0.05089
7	\$0.04468	\$0.06957	\$0.03396	\$0.05537
8	\$0.04813	\$0.07175	\$0.03787	\$0.06135
9	\$0.05348	\$0.06999	\$0.04212	\$0.06802
10	\$0.05636	\$0.07283	\$0.04473	\$0.07381
11	\$0.06218	\$0.06917	\$0.04796	\$0.07018
12	\$0.06995	\$0.06520	\$0.05366	\$0.06585
13	\$0.07668	\$0.06287	\$0.05909	\$0.06303
14	\$0.08574	\$0.06212	\$0.06310	\$0.06092
15	\$0.09586	\$0.06006	\$0.06716	\$0.06019
16	\$0.11021	\$0.05892	\$0.07211	\$0.06048
17	\$0.10940	\$0.06144	\$0.07467	\$0.06356
18	\$0.09744	\$0.06843	\$0.06965	\$0.07190
19	\$0.08112	\$0.06978	\$0.06122	\$0.07337
20	\$0.07115	\$0.06795	\$0.05502	\$0.07117
21	\$0.06026	\$0.06612	\$0.04761	\$0.06793
22	\$0.05231	\$0.05699	\$0.04345	\$0.06011
23	\$0.04530	\$0.05015	\$0.03828	\$0.05312
24	\$0.03966	\$0.04283	\$0.03435	\$0.04610

1 **Q: Can you provide some background on what is being proposed for**
2 **grandfathered/frozen rates and why?**

3 A: The Company completed a study exploring the consolidation of the MO Metro and MO
4 West rates which was filed on October 31, 2020. The objective of the study was to
5 outline the current state of operations, costs, and rates, the potential obstacles with
6 immediate rate consolidation given the current state, and finally, the steps contemplated
7 to consolidate rates properly. Because of concern with the impact to customers, a careful
8 incremental process and plan was outlined to ensure minimal impact and to allow time
9 for customer adjustment. The proposals for the elimination of grandfathered rates
10 represents a portion of Steps 1, 2, 3 of that plan.

11 **Q: For the elimination of grandfathered rates and rate clean up, what analysis was**
12 **performed to support those proposals?**

13 A: The Company completed various analyses to understand the impact of the proposals to
14 determine feasibility. The following steps were performed:

- 15 • Identified full list of frozen rates/rate provisions
- 16 • Determined the number of customers on each and how long the rate had been
17 frozen
- 18 • Pulled test year actual¹ billing determinants for all customers in a given frozen
19 rate/provision
- 20 • Performed best fit analysis to determine the best rate for each customer
- 21 • Performed bill impact analysis comparing the current rate and the new using test year

¹ All bill impact analysis and corresponding analysis that utilizes billing determinants actuals (kwh, kw, and customer count) will be based calculated on an actual basis with no adjustment for weather or growth. Only customers with a full 12 months of data in the test year were analyzed.

- 1 • Finalized recommendations
- 2 • Developed an approach to contact and educate impacted customers

3 **Q: Are you proposing elimination of all grandfathered/frozen rates at this time?**

4 A: Yes, all frozen rates are being proposed for elimination in this rate case filing, except for
5 certain Lighting rates that have customers still on them. All frozen rates being proposed
6 for elimination are discussed in this Direct testimony with the exception of the frozen
7 Lighting rates with no customers on them.

8 **Q: What is the Company proposing for the Residential Other rate and why?**

9 A: The Company proposes elimination of the Residential Other rate and moving those
10 customers to the Residential Standard rate. The Residential Other rate provides electric
11 service to Residential customers who have dedicated well pumps, barns, machine sheds,
12 detached garages, etc. and whose corresponding usage would not currently qualify under
13 any other Residential rate. The Company views this usage is as largely an extension of
14 Residential usage and believes it should be covered as part of the Residential General use
15 tariff. This will require modification of the tariff language to allow for this change.
16 Those proposed changes are reflected in the tariffs supporting this rate case filing.

17 **Q: What were the results of the customer bill impact analysis?**

18 A: Based on review of 4,079 customers with 12 months of actual usage for the 12 months
19 ending June 30, 2021, 100% of customers could experience a bill decrease ranging from
20 15% to 30%² and greater.

² Potential impact was measured on an actual basis with no adjustment for rate increase proposed in this case.

1 **Q: What else is being proposed for the Residential Class and why?**

2 A: The Company is proposing to eliminate the frozen Residential Time of Day rate. This
3 rate has been frozen since 2017 and has no customers on it. The Company began
4 offering a new TOU rate in 2019 that leverages AMI technology and provides various
5 education tools that customers can use to learn more about their electric usage.
6 Residential customers with an AMI meter can choose to participate in this TOU rate or
7 the new 2 period TOU rate being proposed as part of this rate case filing. With several
8 options for TOU rates and no customers on the frozen TOU rate, the Company would like
9 to eliminate this outdated TOU rate from its rate book.

10 **Q: Moving on to Non-Residential proposals, what is being proposed for the Separately
11 Metered Heat rate and why?**

12 A: The Company is proposing eliminating the Separately Metered Heat Rate available to
13 Small General Service customers. This rate has been frozen since June 15, 1995 and has
14 only 48 customers in the test year. Additionally, no other Non-Residential class offers a
15 special end use rate offering for space heat. Given these factors and the Company's Rate
16 Plan aiming for rate simplicity, jurisdictional alignment, and the movement away from
17 end use rates, the timing seems right to propose elimination.

18 **Q: What were the results of the customer bill impact analysis?**

19 A: Based on review of 43 customers with 12 months of actual usage for the 12 months
20 ending June 30, 2021, 100% of customers could experience a bill increase. An average
21 customer would see a \$250 annual increase or a 28%³ increase. However, the majority of
22 this increase is attributable to an error in historical billing related to the customer charge.

³ Potential impact was measured on an actual basis with no adjustment for rate increase proposed in this case.

1 The tariff allows the separate meter rate to be billed at a lower fixed charge/customer
2 charge than that of the Standard Small General Use rates. This customer charge of \$9.43
3 was intended to be billed in addition to the Standard Customer Charge of \$23.14.
4 Instead, the entire account was billed the lower \$9.43 and thus was not adequately
5 covering their intended fixed costs. When this change to the Customer Charge is
6 adjusted for, the average impact of the recommended change is a 9%³ or an \$85 increase
7 annually.

8 **Q: What else is being proposed for the Non-Residential Classes and why?**

9 A: The Company is proposing elimination of the frozen General Service Time of Day Rate.
10 The rate has been frozen since 2017, there is only one customer currently on the rate, and
11 best fit analysis shows that this customer would benefit (bills would decrease) by moving
12 to a standard rate. The Company continues to evaluate rate offerings that might be
13 offered in the future and expects that TOU rate offerings may be expanded to include
14 Non-Residential classes in a future case.

15 **Q: What is the aggregate revenue impact to the proposals discussed above?**

16 A: Table 2 below shows the aggregated impact of each proposal and the movement of
17 customers from eliminated rates to standard rates and the change in customer count, kwh,
18 and calculated revenue based on those specific customers moved by rate code. For
19 example, for rate code MORO, 4079 customers and 15,414,764 kwh were moved from
20 MORO to MORG. The actual revenue impact for this movement resulted in a change in
21 actual revenue from \$2,692,423 (MORO) to \$2,028,886 (MORG). Table 3 below shows
22 the aggregated impact of all proposals on weather normalized test year revenues. The

1 total aggregated impact of the proposals results in a reduction in test year revenues of
 2 approximately \$649,353.

3

Table 2- Aggregated Revenue Impact for Each Proposal (Actual Revenues)

5

Aggregate Impact of Grandfathered Rate Clean Up										
Actual Revenues										
Rate Class	Proposal	MO West Rates	Total Revenue (Before Changes)	Customer /Bill Count	Customer Count Change (+/-)	Adj Customer Count	Energy Total (KWH)	Switchers (+/-)	Energy Total (KWH)	Total Revenue (excluding FAC & DSIM)
Res	Other to Standard Rate	MORO	\$2,692,423	4,079	(4,079)	-	15,414,764	(15,414,764)	-	\$0
Res	Other to Standard Rate	MORG	\$0	-	4,079	4,079	-	15,414,764	15,414,764	\$2,028,886
Residential Total			\$2,692,423	4,079	(0)	4,079	15,414,764	-	15,414,764	\$ 2,028,886
Non Res	General Service Time of Day	MO630	\$17,864	1	(1)	-	199,499	(199,499)	-	0
Non Res	Small General Service	MOSDS	0	47	1	1	199,499	(199,499)	-	16,325
Non Res	2 Meter Heat Rate - 1 Meter Heat Rate	MOSHS	\$72,303	48	(48)	0	877,534	(877,534)	-	0
Non Res	Small General Service no demand	MOSGS	0	48	48	48	877,534	(877,534)	-	88,105
Non Residential Total			\$ 90,167	49	-	49.00	1,077,033	-	\$ -	104,430
GRAND TOTAL			\$ 2,782,590	\$ 4,128	\$ (0)	\$ 4,128	\$ 16,491,796	\$ -	\$ 15,414,764	\$ 2,133,316

6

7

Table 3- Aggregated Weather Normalized Test Year Revenue Impact for All Proposals- By Class

Aggregate Impact of Grandfathered Rate Clean Up										
WN/CG Test Year Revenues										
Rate Class	MO West Rates	Total Revenue (Before Changes)	Customer /Bill Count	Customer Count Change (+/-)	Adj Customer Count	Starting Energy Total (KWH)	Switchers (+/-)	Final Adj Energy Total (KWH)	Total Revenue (excluding FAC & DSIM)	
Residential Class	MORG	\$ 205,757,460	173,693	4,163	177,856	1,808,600,940	15,262,795	1,823,863,735	\$ 207,785,670	
	MORO	\$ 2,692,611	4,163	(4,163)	-	15,262,797	(15,262,797)	-	\$ -	
Residential Total		\$ 208,450,072	177,856	-	177,856	1,823,863,737	(2)	1,823,863,735	\$ 207,785,670	
Small General Service	MOSGS	\$ 28,615,376	26,004	47	26,050	219,688,660	898,322	220,586,982	\$ 28,705,600	
	MOSHS	\$ 74,030	47	(47)	-	898,323	(898,323)	-	\$ -	
	MOSDS	\$ 82,934,134	11,085	1	11,086	914,432,271	203,529	914,635,800	\$ 82,950,853	
Small General Service Total		\$ 111,623,540	37,135	1	37,136	1,135,019,254	203,528	1,135,222,782	\$ 111,656,453	
General TOD	MO630	\$ 17,864	1	(1.00)	-	199,499	(199,499)	-	\$ -	
General TOD Total		\$ 17,864	1	(1)	-	199,499	(199,499)	-	\$ -	
Non Residential Total		\$ 111,641,404	37,136	0	37,136	1,135,218,753	4,029	1,135,222,782	\$ 111,656,453	
GRAND TOTAL		\$ 320,091,476	214,992	0	214,992	2,959,082,490	4,027	2,959,086,517	\$ 319,442,123	
*Total revenues are excluding riders										
**Customer/Bill Count is annualized - If there is 1 bill for each month of the test year, or 12 bills, the Customer/Bill Count will equal 12/12 or 1.										

10

1 **Q: Do Tables 2 and 3 reflect all proposals that have been adjusted for and reflected in**
2 **the test year revenues in this filing?**

3 A: Yes.

4 **Q: Is there anything else to add with regard to these proposals and the rate clean up**
5 **being done to facilitate jurisdictional alignment?**

6 A: Yes. Given the expansive nature of the proposed changes and the number of customers
7 being moved and impacted, implementation will be more arduous, requiring careful
8 planning and consideration to ensure minimal customer impact. The Company is
9 expecting that full implementation of these changes and the elimination of rates may not
10 be completed by the effective date of rates and may require extra time for
11 implementation. The Company is still working through various implementation
12 scenarios and is still assessing the expected timeline or how much extra time might be
13 needed, but at this point, it is not expected to be extensive. The Company expects to
14 share implementation plans and needs as the rate case evolves.

15 **Q: What about new plans being introducing around Hours Use?**

16 A: Like the jurisdictional alignment work described above, the review of Hours Use is part
17 of the broader Rate Plan that includes rate clean up and jurisdictional alignment and is in
18 response to stakeholder and customer feedback communicating interest in this charge
19 being simplified to ease understanding and to enable more active management and
20 monitoring by the customer. The Company worked with Concentric Energy Advisors to
21 review the calculation of the energy charge. The Company is introducing the results of
22 that review in this case to inform a future case where these study results will be used to
23 propose potential changes to the energy charge calculation.

1 **Q: What is the recommendation and what analysis has been performed to support the**
2 **plan?**

3 A: First, a cross jurisdictional review of existing rate classes and rate structures/pricing,
4 including the calculation of the energy charge and demand charge was performed in order
5 to assess differences and similarities. Second, cost data from Class Cost of Service
6 study⁴ and billing determinants (energy and demand) from the test year was obtained.
7 Using that data, the “unraveling” of the hours use calculation began and a determination
8 of the customer impacts was ascertained. Given those impacts, in a future rate case, the
9 Company will be proposing a multi-step plan to move from the hours use calculation to a
10 more standard and more transparent energy charge calculation. The proposal will include
11 the flattening of energy charges and the redistribution of some demand costs back into the
12 demand charge. demand charge. This retains the intended price signaling which exists
13 within the current hours use structure, but in a more straightforward manner. The plan
14 will need to be executed over multiple rate cases due to the potential impact to customers.
15 The table below summarizes the proposed C&I rate structures:

⁴ The Class Cost of Service study from the 2018 rate case was the most recent CCOS study available at the time of the Hours Use review.

Table 4- Summary of Future Changes to the Hours Use Rate Structure

Rate Class	Missouri West	Missouri Metro
Large Power Service	<ul style="list-style-type: none"> - Summer/winter flat demand charge - Summer/winter flat energy charge - Removed Base/Seasonal demand and energy distinction - <i>No phase-in required</i> 	<ul style="list-style-type: none"> - Summer/winter flat demand charge - Summer/winter flat energy charge - Assumes customers will remain on off-peak rider under proposed rates. - Removed blocked demand charge - <i>Three-step phase-in proposed</i>
Large General Service	<ul style="list-style-type: none"> - Summer/winter flat demand charge - Summer/winter flat energy charge - Removed Base/Seasonal demand and energy distinction - <i>Two-step phase-in proposed</i> 	<ul style="list-style-type: none"> - Summer/winter flat demand charge - Summer/winter flat energy charge - <i>Three-step phase-in proposed</i>
Medium General Service	<ul style="list-style-type: none"> - Not applicable 	<ul style="list-style-type: none"> - Summer/winter flat demand charge - Summer/winter flat energy charge - <i>Three-step phase-in proposed</i>
Small General Service	<ul style="list-style-type: none"> - Summer/winter flat demand charge - Summer/winter flat energy charge - Removed Base/Seasonal demand and energy distinction - <i>Three-step phase-in proposed</i> 	<p><u>Secondary Voltage</u></p> <ul style="list-style-type: none"> - Summer/winter flat energy charge - Summer/winter demand charge applied to demand in excess of 25kW - <i>Three-step phase-in proposed</i> <p><u>Primary Voltage</u></p> <ul style="list-style-type: none"> - Summer/winter flat energy charge - Summer/winter flat demand charge - <i>Three-step phase-in proposed</i>

1

2 For more details on the proposal and all analysis performed, please see Schedule MEM-4
3 for the Hours Use Report.

4 **Q: If Evergy is not proposing the elimination of Hours Use in this case, why is it being**
5 **discussed?**

6 A: Unlike the jurisdictional alignment proposals discussed earlier, the Hours Use study
7 explores a possible avenue for simplification, but with a focus on jurisdictional
8 alignment. Currently, Evergy’s Kansas Central jurisdictions calculates the Energy charge
9 in a manner that veers away from the Missouri Metro, Missouri West, and Kansas Metro
10 jurisdictions and offers a flat seasonal differentiated Energy Charge. The Company took
11 inspiration from this method in its undertaking of the Study. Our goal in this rate case is

1 to introduce the concepts being explored to change the calculation of the Energy Charge
2 and determine a path for formal proposal of a change to be included in a future rate case.
3 As such, we hope to collect formal feedback and impressions from stakeholders in this
4 case to help inform how we might modify the proposals being considered to address
5 broader considerations.

6 **Q: What are Bright Lines?**

7 A: Bright Lines, in utility tariff application, are thresholds which define the utility classes.
8 These thresholds could be expressed in terms of energy usage, demand or capacity, or
9 some other measure of a customer's power usage. Based upon where a customer's
10 pertinent determinants fall within said thresholds and/or similarities in load profiles,
11 customer are grouped into a given class over another. In Evergy's Kansas Central
12 jurisdiction existing application, Bright Lines are based upon customer Non-Coincident
13 Peak (NCP) demands. As part of the Rate Plan that includes jurisdictional alignment, the
14 Company is exploring Bright Lines to bring some consistency to how rate classes are
15 defined across its jurisdictions, as well as minimize rate switching across classes.

16 **Q: What is the recommendation and what analysis has been performed to support it?**

17 A: After examining actual revenues in the test year, best-fit Bright lines were determined
18 across jurisdictions, utilizing maximum NCP demand as the defining criteria. These best-
19 fit lines were determined by established maximums that would minimize customer rate
20 switching. An analysis keeping class counts static was done, as well as a more finite
21 analysis keeping absolute switchers to a minimum. In comparing these lines across all
22 three jurisdictions, it was concluded that all three legacy KCP&L jurisdictions were
23 hovering around the 30-200-1,000 maximum demand lines for Small, Medium and Large

1 General Service classes, respectively. After establishing these baselines, individual
2 customer impacts were investigated using actual test year data for MO West and MO
3 Metro. The largest one or two rates in each class of each jurisdiction (summing at least
4 90% of all customers in that class,) were evaluated and their results extrapolated to arrive
5 at full class impacts. Based on test year actuals, MO West could experience an increase in
6 total actual revenues of \$232,331, and MO Metro could experience an increase in total
7 revenues of \$5,626,214. For purposes of revenue effects, no revenue addition was
8 posited for the movement of MO West customers into a new Medium Service class.
9 Average annual customer impacts ranged from -\$119.45 to \$29.56 for MO West classes,
10 and -\$1076.50 to \$718.45 for MO Metro classes. With a focus on minimal upfront
11 customer impacts, and an eye toward finitely defining classes for better cost allocations,
12 rate design, and other class-based considerations, as well as a nod toward jurisdictional
13 alignment, the proposal of Bright Line maximum demands of 30 kW (Small) – 200 kW
14 (Medium) – 1,000 kW (Large) is promoted for implementation in a future rate case.
15 Several factors can impact this proposal including the results of this rate case filing, the
16 timing and frequency of future rate cases, significant change in load profiles, and many
17 other unforeseeable. Evergy wishes to alert the Commission now of its intentions of
18 formally proposing this change in a future rate case filing.

19 **Q: Can you provide more detail on the analysis performed to support this**
20 **recommendation?**

21 A: The following steps and analysis were performed:

- 22
23 1. Pull Test Year data for all customers currently in the Small, Medium, Large, and Large
24 Power classes in all jurisdictions.

- 1 ○ Monthly kWh (actuals)
- 2 ○ Monthly kW (actuals)
- 3 2. Identify maximum, minimum, and average energy and demand values, by customer.
- 4 3. Calculate load factor by customer (based on maximum of energy and demand).
- 5 4. Leverage bright lines experience in Kansas Central jurisdiction specific to how Bright
- 6 Lines were defined.
- 7 5. Graph maximum, minimum, and average demands by class, in an attempt to see any
- 8 patterns, alignments, or natural divisions in and between classes.
- 9 6. Evaluated the impact (switchers) of setting existing and new max demand thresholds
- 10 across jurisdictions/classes to determine cross jurisdictional feasibility with the goal of
- 11 minimizing impacts.
- 12 7. Using actuals, ran individual bill impacts for impacted customers (customers likely to
- 13 switch) and calculated change to revenue and bills. Any impacts associated with new
- 14 classes (Medium for Evergy MO West) were assumed to be revenue neutral or 0.

15 **Q: If Evergy is not proposing Bright Lines in this case, why is it being discussed?**

16 A: Similar to Hours Use, the Company hopes to collect stakeholder impressions and
17 feedback to determine a path for formal proposal in a change to be included in a future
18 rate case. We hope that feedback provided during this rate case can help inform how we
19 might modify the proposals being considered to address broader considerations.

20 **Q: Are there other new rates that you've not included in your discussion above?**

21 A: My testimony mainly covered those rates resulting from the specific studies that were
22 performed. There are other new rates or customers programs that are being included in

1 this filing that are covered in the Direct testimonies of Company witnesses Bradley D.
2 Lutz, Kimberly Winslow, and Ryan Hledik.

3 II. ANNUALIZED/NORMALIZED REVENUES

4 **Q: Were the retail revenues included in this filing prepared by you or under your**
5 **supervision?**

6 A: Yes, they were.

7 **Q: Will you describe the method used in developing the revenues for this case?**

8 A: Both the weather-normalized kWh sales and customer growth levels by rate class (i.e.
9 Residential, Small General Service, Medium General Service and Large General Service)
10 were developed by Company witness Albert R. Bass, Jr. Mr. Bass explains those figures
11 and other adjustments, including adjustments for COVID, in his Direct Testimony. The
12 test year used by the Company in this case was the 12 months ending June 30, 2021,
13 which we expect will be updated for known and measurable changes through May 31,
14 2022. The monthly bill frequencies for the 12 months ending June 30, 2021, that contain
15 the billing units for each of the billing blocks for the various rate components, were
16 developed under my supervision. These bill frequencies were developed by collecting
17 the actual usage and customer counts billed in each month of the test period and applying
18 them to the existing rate structures⁵. By applying the existing rates to the usage in each
19 of the billing blocks, the revenues were reproduced, providing a basis for determining the
20 overall revenues to be used in this case. The Company determined monthly revenues by
21 applying the normalized sales and customer levels for each month represented in the test
22 period to the corresponding billing frequency. The normalized sales and customer levels

⁵ These actual determinants would reflect the migration of customers that were moved from frozen rates being proposed for elimination in this rate case filing to standard rates.

1 from this were then multiplied by the rates that took effect on December 6, 2018 to obtain
2 the weather normalized and customer growth adjusted monthly revenues available. The
3 sum of the monthly revenues was compared to the actual revenues for the test year
4 ending June 30, 2021 to determine the revenue adjustment contained in the Summary of
5 Adjustments attached to the Direct Testimony of Company witness Ronald A. Klote as
6 Schedule RAK-4 (adjustment no. R-20).

7 **Q: Were all class revenues developed as described above?**

8 A: Yes, except for the Large Power Class. The Large Power class revenues generally
9 followed the methodology outlined above but were developed on an individual customer
10 basis. Customer growth was accounted for by the annualization of usage for new
11 customers switching (or starting new service) to the Large Power Class or customers
12 leaving the Large Power Class (either due to switching or stopping service) through the
13 end of the test year period.

14 **Q: Have there been any operational change(s) that would impact the calculation of test
15 year revenues?**

16 A: Yes. Historically and in the last general rate case, the Company relied on hourly load
17 research for purposes of determining weather normalization. This hourly load research
18 was prepared utilizing a sample of customers to determine hourly loads by class. As of
19 December 2020, the Company has discontinued load research.

20 **Q: Why did the Company discontinue load research?**

21 A: The Company implemented Advance Metering Infrastructure (AMI) metering and
22 completed implementation of those meters in all Missouri jurisdictions in early 2020. In
23 order to leverage the benefits of AMI technology and broaden the data set used for

1 weather normalization and rate design, it was decided to transition from using a load
2 research sample to full utilization of AMI data available.

3 **Q: Is AMI data better than load research data?**

4 A: The Company's load research data was relied upon for many years to support various
5 analysis requiring customer load analysis and to support general rate cases. Stakeholder
6 feedback was consistently very positive with regards to load research data, the
7 methodology and the analysis. However, the Company would be remiss to not maximize
8 utilization of a broader data set. For more information on how AMI data was utilized in
9 weather normalization, please see the Direct testimony of Company witness, Albert Bass,
10 Jr.

11 **Q: The Company has several riders in place to recover particular costs. How will these
12 mechanisms affect the requested increase in this case?**

13 A: The Demand-Side Investment Mechanism ("DSIM") is separate from the revenue
14 requirement requested in this case and thus the associated DSIM revenues have been
15 removed from the total revenues available. The fuel adjustment clause ("FAC") rider
16 base amount has been re-based within the current revenue requirement. In addition to my
17 testimony on the FAC, please see the Direct Testimony of Linda Nunn for the primary
18 details concerning the continuation of the FAC in this case.

19 III. ELECTRIC CLASS COST OF SERVICE STUDY

20 **Q: Has the Company performed a CCOS study for this case?**

21 A: Yes, the Company performed a CCOS study representative of the Evergy Missouri West
22 jurisdiction. A summary of the results of the Company's CCOS studies are attached and
23 marked as Schedule MEM-1 and MEM-2.

1 **Q: Was the study prepared by you or under your direct supervision?**

2 A: Yes, it was. The Company utilized the services of 1898 & Co., a Division of Burns &
3 McDonnell Engineering Company, Inc., who performed the primary CCOS modeling
4 using data provided by the Company.

5 **Q: Has the Company filed a CCOS in previous rate cases?**

6 A: Yes. In all rate cases filed since 2005, the Company has filed a CCOS study.

7 **Q: What is the purpose of the CCOS study?**

8 A: The purpose of the CCOS study is to directly assign or allocate each relevant component
9 of the Company's revenue requirement on an appropriate basis in order to determine the
10 contribution that each customer class makes toward the Company's overall rate of return.
11 The CCOS analysis strives to attribute costs in relationship to the cost-causative factors
12 of demand, energy and customer.

13 **Q: Would the CCOS study serve as the basis for the determination of increasing or
14 decreasing overall revenue levels for Evergy Missouri West?**

15 A: No. Determination of the revenue requirement requested in this case is accomplished
16 using the jurisdictional model sponsored by Company witness Ronald A. Klote. The
17 CCOS model uses the information from the jurisdictional model as an input for the
18 primary purpose of evaluating the possible distribution of costs to the respective classes.

19 **Q: What classes are used as a basis for this CCOS study?**

20 A: The primary classes the Company used in its analysis are Residential, Small General
21 Service, Large General Service, Large Power Service, and Lighting.

22 **Q: Do these classes conform to the proposed electric rate tariffs?**

1 A: Generally, they do. The Residential class has several rate classifications available to it
2 that include general use, general use and space heat, and time of use. The Small General
3 Service, and Large General Service classes also have general usage rates and all electric
4 rates, plus they can be specific to the voltage level at which the customer receives
5 service. The Large Power Service class is distinguished by the specific voltage at which
6 the customer receives service. In total, the Company has four classes of service (plus
7 Lighting) but has approximately 48 rates to meet the specific needs of the customer and
8 reporting and billing requirements.

9 **Q: What test year was used for the CCOS study?**

10 A: The study is based on a historical test year of the 12 months ending June 30, 2021, with
11 known and measurable changes projected through May 31, 2022.

12 **Q: What general categories of cost were examined and considered in the development
13 of the CCOS study?**

14 A: An analysis was made of all elements of cost as defined by the Federal Energy
15 Regulatory Commission (FERC) Uniform System of Accounts, including investment
16 (rate base) and expense (cost of service) for the purpose of allocating these items to the
17 customer classes. To achieve this allocation, we begin by functionalizing and classifying
18 costs.

19 **Q: Please explain what you mean.**

20 A: In order to make the appropriate assignment of costs to the appropriate class of customer,
21 it is necessary to first group the costs according to their function. The functions used in
22 the CCOS study were production, transmission, distribution, and other costs. The next

1 step was to classify the costs. Costs are classified as customer-related, energy-related, or
2 demand-related.

3 **Q: What do you mean by customer-related, energy-related and demand-related?**

4 A: Customer-related costs are those costs necessary to provide electric service to the
5 customer independent of any usage by the customer. Some examples of these costs
6 include meter maintenance, customer accounting, billing, and a portion of the investment
7 in distribution plant equipment such as the meter and service line, facilities that are all
8 necessary to make service available. Portions of the distribution facility are separated
9 between the customer costs and the demand costs.

10 Energy-related costs are directly related to the generation and consumption of
11 energy and consist of such things as fuel and purchased power and certain production
12 operation and maintenance costs.

13 Demand-related costs relate to the investment and expenses associated with the
14 Company's facilities necessary to supply the customer's full load requirements
15 throughout the year. The majority of demand-related costs consist of production plant
16 (generation), transmission plant and the non-customer portion of distribution plant.

17 **Q: After the above classification of plant investment and operating costs into customer-
18 energy- and demand-related components, what was the next step in the CCOS
19 study?**

20 A: The next step was to allocate each of the three categories of cost to each customer class
21 utilizing allocation factors appropriate for each of the above categories of cost.

1 **Q: How are the allocation factors generally determined?**

2 A: Costs are evaluated to determine the cause driving the cost to be incurred and to establish
3 an allocation method that best distributes the cost based on that causation. Customer-
4 related costs are generally allocated on the basis of the number of customers within each
5 class. Data for the development of the customer-related allocation factors came from
6 Company billing and accounting records. Some of the customer-related accounts were
7 allocated based on a weighted number of customers to reflect the weighting associated
8 with serving those customers.

9 Energy-related allocation factors were derived on the basis of each customer
10 classes' respective energy (kilowatt hour) requirements. Kilowatt-hour ("kWh") sales to
11 each customer class were available from Company records. The sales data was adjusted
12 to reflect COVID, normal weather, a normal 365-day year, rate switchers, energy
13 efficiency programs, customer growth, and system losses in order to assign the
14 Company's total system output.

15 **Q: How are class demand allocation factors generally determined?**

16 A: The data necessary to develop class demand allocation factors (production and
17 transmission) were derived from the Company's AMI data. Such data consisted of the
18 hour-by-hour use of electricity by each customer class throughout the study period.

19 **Q: Was Evergy Missouri West's AMI data used to develop any other allocators?**

20 A: Yes, it was used to develop distribution plant allocators based on customer's non-
21 coincident peak ("NCP") loads within each class.

1 **Q: Are any costs assigned directly to classes?**

2 A: Yes. In instances where the costs are clearly attributable to a specific class, they are
3 directly assigned to that class.

4 **Q: What method do you propose to allocate production plant?**

5 A: Production plant is the single, largest component cost to allocate to the classes within the
6 study. As such, the production allocator has the most impact on the outcome of the
7 CCOS study. After considerable efforts to determine the most appropriate production
8 allocation methodology in the prior rate case, the Company intends to continue to utilize
9 the Energy Weighted approach, specifically the Average & Excess Demand (“AED”) allocation
10 method, incorporating a four (4) Coincident Peak (“CP”) component (collectively “AED-4CP”).
11 An Energy Weighted approach was viewed to be cost effective, balanced through its incorporation
12 of energy, and less subjective than other methods. Utilization of the AED method is an energy-
13 weighted method of production plant allocation that gives classes a reasonable balance between
14 the energy and capacity function of generating facilities. Use of the AED method is also
15 consistent with the provisions of Section 393.1620(2), RSMo.

17 **Q: Has this allocation method been used before?**

18 A: Yes, the AED-4CP method was used by the Company in the most recent CCOS study
19 filed in its 2018 rate cases.

20 **Q: How were the fuel costs associated with the production plant allocated in the CCOS
21 study?**

22 A: Fuel costs were allocated using a monthly kWh allocator. Based on monthly fuel costs
23 from the Company for the 12 months ended June 30, 2021, each month’s fuel costs were

1 allocated to each customer class's corresponding calendar month kWh sales adjusted for
2 losses. These allocated results were summed by rate and major customer class to identify
3 a proxy fuel allocator which was then used to allocate the actual fuel costs shown in the
4 CCOS study. To ensure the allocation was representative of a normal year, an adjustment
5 was made to the fuel costs associated with February 2021 due to the cold weather event
6 that occurred⁶.

7 **Q: How were the off-system sales margins that Evergy Missouri West receives from its**
8 **external sales of energy allocated?**

9 A: They were allocated using an energy allocator.

10 **Q: What method did you use to allocate transmission plant costs?**

11 A: Transmission plant costs were allocated AED-4CP allocation method.

12 **Q: What method did you use to allocate Distribution Plant?**

13 A: Depending on the plant account, distribution plant is allocated using either a demand or
14 customer allocation factor. Accounts 360 through 363 are demand-related and allocated
15 using a Non-Coincident Peak ("NCP") demand allocator based on the use of NCP class
16 demands. Accounts 364 through 368 include both a demand and a customer component
17 and use a minimum system method to distinguish the appropriate split between demand
18 and customer-related costs for each account. The demand components are allocated
19 using the Class NCP allocator and the customer component is allocated using a customer
20 allocator. The remaining distribution plant accounts (369-373) were allocated using a
21 customer allocation factor.

⁶ The fuel costs for February 2021 were replaced with the average fuel costs in February for 2018, 2019, and 2020.

1 **Q: What method did you use to allocate Services?**

2 A: Since Account 369 - Services is considered customer-related, these costs were allocated
3 based on the customers receiving service at a secondary voltage.

4 **Q: What method did you use to allocate Meters?**

5 A: Meter costs, recorded to Account 370, are also customer-related and were allocated using
6 an assignment of all meters and metering devices to customer classes.

7 **Q: Did you include any other rate base elements in the study?**

8 A: Yes, multiple rate base elements have been included. Additions to net plant included
9 cash working capital, taxes other than incomes taxes, tax offset from rate base, materials
10 and supplies, prepayments, fuel inventory, and various regulatory assets. The following
11 details their allocation to various functions and classifications:

- 12 • The cash working capital component of rate base was developed and allocated on
13 energy, payroll, and plant in service.
- 14 • Taxes other than income taxes were developed and allocated on retail revenue and
15 plant in service.
- 16 • Tax offset from rate base was allocated on plant in service.
- 17 • Materials and supplies were allocated on a mix of production, transmission, and
18 distribution plant allocators.
- 19 • Prepayment items were allocated using plant in service and customer allocation
20 factors.
- 21 • Fuel inventory was allocated on energy.
- 22 • Regulatory assets were allocated on payroll, energy, customer, and demand
23 allocation factors depending on the costs tracked.

- 1 • Subtractions to net plant included accumulated deferred taxes, customer advances,
- 2 customer deposits, gain on SO2 emissions and income eligible weatherization.
- 3 • The accumulated deferred taxes were allocated on plant in service.
- 4 • Customer advances for construction were allocated on total distribution plant.
- 5 • Customer deposits were developed using the data analysis by customer group
- 6 available from the Company.
- 7 • Gain on SO2 emissions allowances were allocated on energy production.
- 8 • Income eligible weatherization was allocated by customers.

9 **Q: What revenues did you use for this study?**

10 A: The class revenues were developed under my supervision and were discussed earlier in
11 this testimony. Other sources of revenues such as Miscellaneous Revenues were
12 allocated consistent with the revenue source.

13 **Q: How were Operation and Maintenance (“O&M”) Expenses allocated?**

14 A: O&M Expenses were allocated using various methods dependent of the cost causation.
15 O&M for production, transmission and distribution plant were allocated to customer
16 classes following plant. Customer Accounts Expenses, Customer Services and
17 Information Expenses, Sales Expenses, and Administrative and General Expenses were
18 allocated based on the results of individual allocation studies. Administrative & General
19 expenses were primarily allocated on the payroll allocator with the exception of the
20 following:

- 21 • Account 924, Property Insurance, which was allocated based on plant in service.
- 22 • Account 928, Regulatory Commission expenses, which was allocated on plant in
- 23 service and energy production.

- Account 929 Duplicate Charges - Credit, which was allocated on customer sales.

Q: What is the next step after the allocations are applied?

A: The next step is to determine the relative return on rate base for each of the classes and rates in the study. The ratio of class revenues less expense (net operating income) divided by class rate base will indicate the rate of return being earned by the Company that is attributable to a particular class. It is necessary to keep in mind that this calculation only represents a snapshot in time. The results of the CCOS study will most likely vary over time. The results of the study will also vary if you apply different allocation factors to the study. By applying different methods to the allocation process, you can change the outcome of the CCOS study.

Q: What were the results of the CCOS study⁷?

A: The jurisdictional rate of return was calculated to be 5.3%. Individual classes' rates of return at current rates vary, and based on the current costs, are shown in the following table.

Residential	Small General Service	Large General Service	Large Power Service	Thermal Service	Other Lighting	CCN
2.7%	10.4%	9.7%	8.4%	9.7%	6.5%	-67.0%

⁷ The results of the CCOS study results summarized here exclude Special Contracts. The full details from the CCOS study inclusive of Special Contracts can be found in the CCOS study workpapers and full model results.

1 **Q: If rates were changed so that Evergy Missouri West earned the same rate of return**
2 **from each customer class, how much would each class’s rates need to change?**

3 A: To achieve the jurisdictional revenue increase of 8.3%, the classes should be adjusted by
4 the percentages in the table below.

5 **Table 6- Rate Increase Needed to Achieve and Equalized Rate of Return**

Residential	Small General Service	Large General Service	Large Power Service	Thermal Service	Other Lighting	CCN
23.5%	-12.4%	-9.6%	-4.4%	-8.3%	3.7%	4399%

6 **Q: What general conclusion can be made from these results?**

7 A: The results of the CCOS study show that each class of customers recovers the cost of
8 service to that class and provides a return on investment, except the CCN class. The
9 results also show that Residential class revenue is below the Total Missouri (“MO”) Retail rate of return level, while the Small General, Large General, Large Power,
10 Thermal, and Lighting class revenues are above the Total MO Retail rate of return.

11 **Q: Are you proposing changes to the class revenues based on the results of the study?**

12 A: Yes.

13 **Q: Are you proposing changes to class revenues that are reflective of an equalized rate**
14 **of return by class?**

15 A: No. The exact application of changes in rates that aim for an equalized rate of return by
16 class would have been extremely detrimental to our residential customers and not in line
17 with sound rate design principles. Instead, the Company opted for a gradual approach to
18 adjusting revenues and rates. Utilizing the results from the study prepared based on the
19 Average & Excess production allocation the Company has identified the following
20

1 recommended changes to class revenues⁸ based on an overall jurisdictional revenue
2 requirement increase of 8.31⁹:

- 3 • Apply a 10.84% (approximately 128% of the jurisdictional rate increase) increase
4 to the Residential class, and
- 5 • Apply a 10.50% (approximately 128% of the jurisdictional rate increase) increase
6 to the CCN class, and
- 7 • Apply a 7.05% (approximately 75% of the jurisdictional rate increase) increase to
8 the Large Power Service class, and
- 9 • Apply a 7.77% (approximately 75% of the jurisdictional rate increase) increase to
10 the Large General Service class, and
- 11 • Apply a 4.30% (approximately 50% of the jurisdictional rate increase) increase to
12 the Small General Service class, and
- 13 • Apply a 6.39% (approximately 75% of the jurisdictional rate increase) increase to
14 the Thermal class, and
- 15 • Apply a 5.03% (approximately 75% of the jurisdictional rate increase) increase to
16 the Lighting class

17 Application of these proposals to the electric rates is discussed further in the rate design
18 section of this testimony.

⁸ These results exclude Special Contracts.

⁹ This change represents the rate increase including Net Fuel. The overall rate increase excluding Net Fuel is 3.89%.

1 **Q: In proposing class revenue shifts, is there an expectation of rate switchers that**
2 **should be considered and taken into account?**

3 A: Yes. Revenue losses associated with potential rate switching resulting from the above
4 rate changes are possible. The Company plans to size this impact by the True-up and if
5 possible, sooner.

6 IV. ELECTRIC RATE DESIGN

7 **Q: Are you sponsoring the electric tariffs filed in this case?**

8 A: Yes, I am.

9 **Q: Please summarize the proposed rate design recommendation for the electric tariffs**
10 **and any additional proposed changes to the tariffs?**

11 A: The Company is requesting an annual aggregate increase over current revenues reflecting
12 impacts before the rebasing of fuel for the fuel adjustment clause, in the amount of \$27.7
13 million (3.89%). The aggregate annual increase over current revenues including the
14 rebasing of fuel for the fuel adjustment clause is \$59.8 million (8.31%).

15 Utilizing the results of the CCOS study, the Company is proposing that an
16 increase of 10.84% be applied to Residential class revenues with a customer charge of
17 \$16.00. The \$16.00 proposed customer charge is based on the results of the CCOS and is
18 consistent with prior Commission approved customer charges. This proposed amount is
19 **below** the recommended CCOS customer charge of \$21.58 which represents the customer
20 charge inclusive of the jurisdictional rate increase on an equalized basis. The Company
21 opted to propose a lesser amount to help manage the impact to customers but hopes to
22 make continued progress towards the equalized customer charge in subsequent rate cases,
23 consistent with prior Commission approved customers charges. The proposed customer

1 charge not only considers incremental progress towards the alignment of cost and
2 ratemaking, but also seeks consistency across its Missouri jurisdictions (Evergy Missouri
3 West and Evergy Missouri Metro). The intention of the Company is to offer one
4 customer charge with the same pricing across both its Missouri jurisdictions. The
5 remaining revenue shortfall/increase was then applied equally to remaining Residential
6 bill components.

7 For the remaining classes (with the exception of CCN), the Company applied
8 approximately 75% of the jurisdictional rate increase¹⁰ or 7.05% for the Large Power
9 Service class, 7.77% for Large General Service class, 6.39% for Thermal, 5.03% for
10 Lighting, except the Small General Service class that where 50% of the jurisdictional
11 increase or 4.30% increase was applied in consideration of the results of the Class Cost of
12 Service study and the C&I class relative rates return. Generally, for the C&I classes, the
13 Company attempted narrow the gap between how costs are incurred and how rates are
14 designed and applied 125% of each class increase to the fixed cost rate components (i.e.
15 customer charges and demand charges) and 75% to the variable cost rate components (i.e.
16 energy charges). The application of the above increases by class by billing component
17 can be found in attached schedule MEM-5. The summary of revenues and proposed
18 increase by class may be found in Schedules MEM-6. For more details on the
19 reasonableness of the rate increase applied to the CCN class, please see the Direct
20 testimony of Company Witness Darrin Ives.

¹⁰ This change represents the rate increase including Net fuel and revenue shifts.

1 **Q: Describe the rate design recommendation for unmetered lighting.**

2 A: The Company's Missouri jurisdictions have established LED streetlights and LED private
3 areas lighting tariffs. As such, all standard municipal street lighting has been converted
4 to LED while the conversion of private area lighting is at the customer's option. In order
5 to highlight the continuing obsolescence of non-LED lighting, the following is reflected
6 in the unmetered Lighting rate design:

- 7 • The adder components (i.e., additional poles, wire spans, etc.) that are common between
8 LED and non-LED rates have been equalized.
- 9 • Non-LED lighting components were allotted a slightly higher portion of the increase
10 assigned to the Lighting class at 1.92% with the mercury vapor lighting getting the
11 highest percentage increase at 4.00%. As mercury vapor replacements are only available
12 in the used market, the higher increase reflects the lack of availability and reflects
13 favorably towards the energy efficient, LED equivalent.
- 14 • LED and traffic lighting received a 0% increase.
- 15 • The transitional LED prices in section 2 of the Municipal Street Lighting Service tariff,
16 sheet No. 150 received a pricing adjustment of 22.52% in order to reduce the price
17 differential to the standard LED prices listed in section 1 of the same tariff sheet by
18 approximately one third. Please see the testimony of Company witness Bradley D. Lutz
19 for details on the transitional rates.

20 **Q: Are there any new tariffs being filed as part of this case?**

21 A: Yes, the Company is proposing expansion of Renewables, TOU programs, and rates
22 supportive of Electrification. Company Witnesses Kimberly Winslow and Bradley D.
23 Lutz explain this in detail in both their Direct Testimonies. Finally, the Company is also

1 proposing a Subscription Pricing proposal that is explained by Company witness Ryan
2 Hledik.

3 • Proposal of New Rates include:

- 4 • Time-Related Pricing tariff (Large C&I Customers)
- 5 • Residential Two Period Time of Use Rate (See Direct Testimonies of Bradley D.
6 Lutz and Kimberly Winslow)
- 7 • Residential Time of Use EV and Time of Use EV+ Meter tariff (See Direct
8 Testimonies of Bradley D. Lutz and Kimberly Winslow)
- 9 • Business EV Charging Service Rate (See Direct Testimony of Bradley D.
10 Lutz)
- 11 • Residential Green Pricing REC Program Rider (See Direct Testimony of
12 Kimberly Winslow)
- 13 • Residential Low Income Solar Subscription Pilot Rider (See Direct Testimony of
14 Kimberly Winslow)
- 15 • Residential Battery Energy Storage Pilot (See Direct Testimony of Kimberly
16 Winslow)
- 17 • Residential Advance Easy Pay Pilot Program (See Direct Testimony of Kimberly
18 Winslow)
- 19 • Residential Subscription Pricing Program (See Direct Testimonies of Bradley D.
20 Lutz, Kimberly Winslow, and Ryan Hledik)
- 21 • Special High Load Factor Market Rate (See Direct Testimony of Bradley D.
22 Lutz)

1 **Q: Please summarize the proposed changes to rules & regulation tariffs and/or other**
2 **non-base rate tariffs.**

3 There are multiple changes proposed to existing tariffs. Some changes are proposed to
4 better align the rules & regulations with current costs, planned business practices, and are
5 generally minimal in impact. Others are more impactful. The most significant changes
6 have already been highlighted in this Direct Testimony and others and includes:

- 7 • Elimination of rates including:
 - 8 • Residential Other Rate (MORO)
 - 9 • Residential Frozen Time of Day rate (MO610)
 - 10 • C&I frozen Separately Metered Heat Rate (MOSHS)
 - 11 • C&I frozen Time of Day rate (MO620, MO630, MO640)
 - 12 • C&I Real Time Pricing Rate
- 13 • Miscellaneous Changes:
 - 14 • FAC (See Direct Testimony of Linda Nunn)
 - 15 • Income Eligible Weatherization (IEW) Program (See Direct Testimony of Kim
 - 16 Winslow)
 - 17 • Solar Subscription Rider Program (See Direct Testimony of Bradley D.
 - 18 Lutz)
 - 19 • Emergency Conservation Plan (See Direct Testimony of Bradley D. Lutz)
 - 20 • Market Based Demand Response (“MBDR”) (See Direct Testimony of
 - 21 Kimberly Winslow)
 - 22 • Interconnection Study Requirements and Fees – the Company proposed to
 - 23 institute requirements and fees associated with large systems requesting to

1 connect to the Company system. Studies are costly and the fees will defray the
2 cost, avoiding subsidy.

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

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

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


In the Matter of Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West's Request for Authority to) Case No. ER-2022-0130
Implement A General Rate Increase for Electric)
Service)

AFFIDAVIT OF MARISOL E. MILLER

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

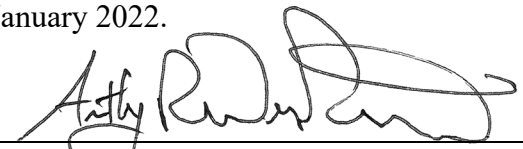
Marisol E. Miller, being first duly sworn on his oath, states:

1. My name is Marisol E. Miller. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Senior Manager – Regulatory Affairs.
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Missouri West consisting of thirty-nine (39) 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.



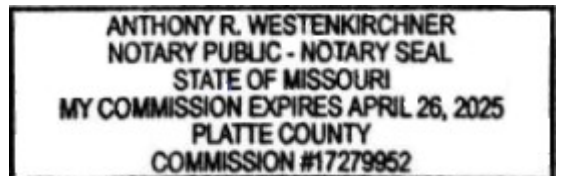
Marisol E. Miller

Subscribed and sworn before me this 7th day of January 2022.



Notary Public

My commission expires: 4/26/2025



**Evergy, Inc. - Missouri West
2022 Rate Case - Direct
Test Year 6/30/2021
Cost of Service Summary**

Allocation Method: Avg & Excess 4 CP

Sch No.	Line No.	Description	MO West Retail	Residential	Small General Service	Large General Service	Large Power Service	Thermal Service	Lighting	CCN
1	1	REVENUE REQUIREMENT SUMMARY								
1	2	Test Year Revenue	\$719,045,350	\$376,086,292	\$116,686,565	\$88,729,808	\$116,143,926	\$460,184	\$13,006,951	\$33,302
1	3									
1	4	Gross Revenue Requirements	\$ 692,345,035	\$ 385,687,501	\$ 96,929,995	\$ 79,222,073	\$ 114,132,121	\$ 439,412	\$ 9,679,764	\$ 1,048,074
1	5	Less Other Revenue	<u>(\$104,791,905)</u>	<u>(\$50,144,205)</u>	<u>(\$ 15,666,536)</u>	<u>(\$ 15,026,427)</u>	<u>(\$ 23,253,072)</u>	<u>(\$ 89,848)</u>	<u>(\$ 605,520)</u>	<u>(\$ 6,298)</u>
1	6	Net Revenue Requirements	\$587,553,130	\$ 335,543,296	\$ 81,263,459	\$ 64,195,646	\$ 90,879,049	\$ 349,563	\$ 9,074,245	\$ 1,041,777
1	7									
1	8	Net Operating Income	\$131,492,221	\$40,542,996	\$35,423,106	\$24,534,162	\$25,264,877	\$110,621	\$3,932,707	(\$1,008,474)
1	9									
1	10									
1	11	RETURN AT PRESENT RATES								
1	12	Rate Base	\$ 2,484,954,467	\$ 1,513,343,876	\$ 342,049,275	\$ 252,928,087	\$ 300,470,847	\$ 1,143,083	\$ 60,350,804	\$ 1,504,067
1	13	Net Operating Income at Present Rates	\$131,492,221	\$ 40,542,996	\$ 35,423,106	\$ 24,534,162	\$ 25,264,877	\$110,621	\$ 3,932,707	(\$1,008,474)
1	14									
1	15	Rate of Return at Present Rates	5.29%	2.68%	10.36%	9.70%	8.41%	9.68%	6.52%	-67.05%
1	16									
1	17	Relative Rate of Return	1.00	0.51	1.96	1.83	1.59	1.83	1.23	(12.67)
1	18									
1	19	Notes:								
1	20	Special contracts are excluded								

**Evergy, Inc. - Missouri West
2022 Rate Case - Direct
Test Year 6/30/2021
Unit Costs of Service Summary**

Sch No.	Line No.	Customer Class	Equalized Rate of Return @ 7.1232%		
			Customer Costs* (\$/bill) Monthly	Energy Costs (\$/kWh) Annual	Demand Costs (\$/kW) Annual
2	1	Residential	\$21.58	\$0.0395	
2	2	Small General Service	\$21.24	\$0.0395	\$9.2973
2	3	Large General Service	\$19.98	\$0.0394	\$10.4385
2	4	Large Power Service	\$61.94	\$0.0388	\$8.0234
2	5	Thermal Service	\$41.51	\$0.0395	\$12.1559
2	6	Lighting		\$0.0395	

* Excluding Local Facilities

Notes:

Allocation Method: Avg & Excess 4 CP

**SCHEDULES MEM-3 THROUGH MEM-4
CONTAIN CONFIDENTIAL
INFORMATION
NOT AVAILABLE TO THE PUBLIC.

ORIGINALS FILED UNDER SEAL.**

Energy - Missouri West Large General Service									
Case No. ER-2022-0130									
Status Direct									
7.77%									
								INPUT FOR MODEL	
								9.71%	5.81%
Ref Column	Charge	Voltage	Rate Code	Season	Tariff Language	Current Rates	Rates with Increase	Proposed Rates	
11	1								
12	2	Customer Charge/ Other Meter	Secondary	MOLGS ;MOLNS ;MOLGSW	Summer/Winter	Customer Charge	72.26	79.28	79.28
13	3	Customer Charge/ Other Meter	Primary	MOLGP ;MOLNP	Summer/Winter	Customer Charge	237.71	260.80	260.80
14	4								
15	5	Facilities Charge - Blk 1	Secondary	MOLGS ;MOLNS ;MOLGSW	Summer/Winter	Facilities Charge	2.211	2.426	2.426
16	6	Facilities Charge - Blk 1	Primary	MOLGP ;MOLNP	Summer/Winter	Facilities Charge	1.432	1.571	1.571
17	7								
18	8	Demand Charge - Blk 1/ Base	Secondary	MOLGS ;MOLNS ;MOLGSW	Summer	Billing Demand	0.875	0.960	0.960
19	9	Demand Charge - Blk 2/ Seasonal	Secondary	MOLGS ;MOLNS ;MOLGSW	Summer	Seasonal Billing Demand	0.875	0.960	0.960
20	10								
21	11	Demand Charge - Blk 1/ Base	Secondary	MOLGS ;MOLNS ;MOLGSW	Winter	Billing Demand	0.590	0.647	0.647
22	12	Demand Charge - Blk 2/ Seasonal	Secondary	MOLGS ;MOLNS ;MOLGSW	Winter	Seasonal Billing Demand	0.000	0.000	0.000
23	13								
24	14	Demand Charge - Blk 1/ Base	Primary	MOLGP ;MOLNP	Summer	Billing Demand	0.848	0.930	0.930
25	15	Demand Charge - Blk 2/ Seasonal	Primary	MOLGP ;MOLNP	Summer	Seasonal Billing Demand	0.848	0.930	0.930
26	16								
27	17	Demand Charge - Blk 1/ Base	Primary	MOLGP ;MOLNP	Winter	Billing Demand	0.572	0.628	0.628
28	18	Demand Charge - Blk 2/ Seasonal	Primary	MOLGP ;MOLNP	Winter	Seasonal Billing Demand	0.000	0.000	0.000
29	19								
30	20	Energy Charge - Blk 1/ On-Peak	Secondary	MOLGS ;MOLNS ;MOLGSW	Summer	First 180 Hours Use	0.08736	0.08736	0.09243
31	21	Energy Charge - Blk 2/ Off-Peak	Secondary	MOLGS ;MOLNS ;MOLGSW	Summer	Next 180 Hours Use	0.06610	0.06610	0.06994
32	22	Energy Charge - Blk 3/ Shoulder /S	Secondary	MOLGS ;MOLNS ;MOLGSW	Summer	Over 360 Hours Use	0.04625	0.04625	0.04894
33	23								
34	24	Energy Charge - Blk 1/ On-Peak	Secondary	MOLGS ;MOLNS ;MOLGSW	Winter	First 180 Hours Use	0.06655	0.06655	0.07042
35	25	Energy Charge - Blk 2/ Off-Peak	Secondary	MOLGS ;MOLNS ;MOLGSW	Winter	Next 180 Hours Use	0.06100	0.06100	0.06454
36	26	Energy Charge - Blk 3/ Shoulder /S	Secondary	MOLGS ;MOLNS ;MOLGSW	Winter	Over 360 Hours Use	0.04177	0.04177	0.04420
37	27								
38	28	Energy Charge - Blk 1/ On-Peak	Primary	MOLGP ;MOLNP	Summer	First 180 Hours Use	0.08471	0.08471	0.08963
39	29	Energy Charge - Blk 2/ Off-Peak	Primary	MOLGP ;MOLNP	Summer	Next 180 Hours Use	0.06410	0.06410	0.06782
40	30	Energy Charge - Blk 3/ Shoulder /S	Primary	MOLGP ;MOLNP	Summer	Over 360 Hours Use	0.04484	0.04484	0.04744
41	31								
42	32	Energy Charge - Blk 1/ On-Peak	Primary	MOLGP ;MOLNP	Winter	First 180 Hours Use	0.06414	0.06414	0.06787
43	33	Energy Charge - Blk 2/ Off-Peak	Primary	MOLGP ;MOLNP	Winter	Next 180 Hours Use	0.05878	0.05878	0.06219
44	34	Energy Charge - Blk 3/ Shoulder /S	Primary	MOLGP ;MOLNP	Winter	Over 360 Hours Use	0.04023	0.04023	0.04257
45	35								
46	36	Seasonal Energy Charge	Secondary	MOLGS ;MOLNS ;MOLGSW	Summer	First 180 Hours Use	0.08736	0.08736	0.09243
47	37	Seasonal Energy Charge 1	Secondary	MOLGS ;MOLNS ;MOLGSW	Summer	Next 180 Hours Use	0.06610	0.06610	0.06994
48	38	Seasonal Energy Charge 2	Secondary	MOLGS ;MOLNS ;MOLGSW	Summer	Over 360 Hours Use	0.04625	0.04625	0.04894
49	39								
50	40	Seasonal Energy Charge	Secondary	MOLGS ;MOLNS ;MOLGSW	Winter	First 180 Hours Use	0.03654	0.03654	0.03866
51	41	Seasonal Energy Charge 1	Secondary	MOLGS ;MOLNS ;MOLGSW	Winter	Next 180 Hours Use	0.03654	0.03654	0.03866
52	42	Seasonal Energy Charge 2	Secondary	MOLGS ;MOLNS ;MOLGSW	Winter	Over 360 Hours Use	0.03654	0.03654	0.03866
53	43								
54	44	Seasonal Energy Charge	Primary	MOLGP ;MOLNP	Summer	First 180 Hours Use	0.08471	0.08471	0.08963
55	45	Seasonal Energy Charge 1	Primary	MOLGP ;MOLNP	Summer	Next 180 Hours Use	0.06410	0.06410	0.06782
56	46	Seasonal Energy Charge 2	Primary	MOLGP ;MOLNP	Summer	Over 360 Hours Use	0.04484	0.04484	0.04744
57	47								
58	48	Seasonal Energy Charge	Primary	MOLGP ;MOLNP	Winter	First 180 Hours Use	0.03562	0.03562	0.03769
59	49	Seasonal Energy Charge 1	Primary	MOLGP ;MOLNP	Winter	Next 180 Hours Use	0.03562	0.03562	0.03769
60	50	Seasonal Energy Charge 2	Primary	MOLGP ;MOLNP	Winter	Over 360 Hours Use	0.03562	0.03562	0.03769
61	51								
62	40	Primary Discount	Secondary/	MOLGS ;MOLNS ;MOLGP ;MOLNP ;MOLGSW	Summer/Winter	Primary Discount	-1.00	-1.00	-1.00
63									
64									
65		Secondary - Summer		Secondary	Summer	100.000%	1.301%	6.330%	
66		Secondary Winter		Secondary	Winter	100.000%	1.583%	6.447%	
67		Primary - Summer		Primary	Summer	100.000%	1.168%	6.514%	
68		Primary - Winter		Primary	Winter	100.000%	1.514%	6.764%	
69		Winter Price Below Summer (SUM-WIN)/SUM				15.112%	14.870%	15.014%	
70		LGS Overall Change					1.462%	6.417%	
71									
72									
73									
74									
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76									
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90									

Revenue	\$	89,859,361.48	\$	91,173,173.78	\$	95,625,498.89
Change in Revenue						\$5,766,137
Proposed change per Revenue Summary						\$ 5,767,424
						(\$1,287)
Net Metering Credit	\$	(8,732.17)				
Parallel Generation Credit	\$	(1,100.24)				
Customer Revenue Share	\$	(14,240.43)				
Rollover Credit Available	\$	(7,173.41)				
Reduced Commitment Surcharge	\$	170.84				
EDR Credit	\$	(1,129,553.25)				
Ex FAC/Line Extension	\$	2,887.50				
	\$	88,701,620.32				

Tie-out to Billed Revenue Total
0.01

	B	C	D	E	F	G	H	I	J
1	Energy - Missouri West								
2	Small General Service								
3									
4									
5				Case No.	ER-2022-0130				
6				Status:	Direct				4.30%
7									
8									
9				JURIS INCREASE (%)			INPUT FOR MODEL		
10	Charge	Voltage	Rate Code	Season	Tariff Language	Current Rates	Rates with Increase	Proposed Rates	
11	Customer Charge/ Other Meter	Secondary/Primary	MOSDS /MOSND /MOSGP /MOSNS	Summer/Winter	Customer Charge	23.14	24.38	24.38	
12	Customer Charge/ Other Meter	Secondary/Primary	MOSHS	Summer/Winter	Separately Metered Heat and/or Water Heating	9.43	9.94	9.94	
13	Facilities Charge - Blk 1	Secondary	MOSDS /MOSND /MOSDSW	Summer/Winter	Facilities Charge	1.398	1.473	1.473	
14	Facilities Charge - Blk 1	Primary	MOSGP	Summer/Winter	Facilities Charge	1.398	1.473	1.473	
15									
16	Demand Charge - Blk 1/ Base	Secondary	MOSDS /MOSND /MOSDSW	Summer	Billing Demand	1.227	1.293	1.293	
17	Demand Charge - Blk 2/ Seasonal	Secondary	MOSDS /MOSND /MOSDSW	Summer	Seasonal Billing Demand	1.227	1.293	1.293	
18									
19	Demand Charge - Blk 1/ Base	Secondary	MOSDS /MOSND /MOSDSW	Winter	Billing Demand	1.199	1.263	1.263	
20	Demand Charge - Blk 2/ Seasonal	Secondary	MOSDS /MOSND /MOSDSW	Winter	Seasonal Billing Demand	0.000	0.000	0.000	
21									
22	Demand Charge - Blk 1/ Base	Primary	MOSGP	Summer	Billing Demand	1.190	1.254	1.254	
23	Demand Charge - Blk 2/ Seasonal	Primary	MOSGP	Summer	Seasonal Billing Demand	1.190	1.254	1.254	
24									
25	Demand Charge - Blk 1/ Base	Primary	MOSGP	Winter	Billing Demand	1.163	1.226	1.226	
26	Demand Charge - Blk 2/ Seasonal	Primary	MOSGP	Winter	Seasonal Billing Demand	0.000	0.000	0.000	
27									
28	Energy Charge - Blk 1/ On-Peak	Secondary	MOSGS /MOSNS /MOSUS	Summer	Summer	0.13542	0.13542	0.14083	
29	Energy Charge - Blk 1/ On-Peak	Secondary	MOSGS /MOSNS /MOSUS	Winter	Winter	0.08508	0.08508	0.08848	
30									
31	Energy Charge - Blk 1/ On-Peak	Secondary	MOSHS	Summer	Summer	0.13542	0.13542	0.14083	
32	Energy Charge - Blk 1/ On-Peak	Secondary	MOSHS	Winter	Winter	0.06335	0.06335	0.06588	
33									
34	Energy Charge - Blk 1/ On-Peak	Secondary	MOSDS /MOSND /MOSDSW	Summer	First 180 Hours Use	0.09494	0.09494	0.09873	
35	Energy Charge - Blk 2/ Off-Peak	Secondary	MOSDS /MOSND /MOSDSW	Summer	Over 180 Hours Use	0.07144	0.07144	0.07430	
36									
37	Energy Charge - Blk 1/ On-Peak	Secondary	MOSDS /MOSND /MOSDSW	Winter	First 180 Hours Use	0.06896	0.06896	0.07172	
38	Energy Charge - Blk 2/ Off-Peak	Secondary	MOSDS /MOSND /MOSDSW	Winter	Over 180 Hours Use	0.06224	0.06224	0.06473	
39									
40	Energy Charge - Blk 1/ On-Peak	Primary	MOSGP	Summer	First 180 Hours Use	0.08907	0.08907	0.09263	
41	Energy Charge - Blk 2/ Off-Peak	Primary	MOSGP	Summer	Over 180 Hours Use	0.06702	0.06702	0.06970	
42									
43	Energy Charge - Blk 1/ On-Peak	Primary	MOSGP	Winter	First 180 Hours Use	0.06773	0.06773	0.07044	
44	Energy Charge - Blk 2/ Off-Peak	Primary	MOSGP	Winter	Over 180 Hours Use	0.06113	0.06113	0.06357	
45									
46	Seasonal Energy Charge	Secondary	MOSGS /MOSNS /MOSUS	Summer	Summer	0.13542	0.13542	0.14083	
47	Seasonal Energy Charge	Secondary	MOSGS /MOSNS /MOSUS	Winter	Winter	0.04364	0.04364	0.04538	
48									
49	Seasonal Energy Charge	Secondary	MOSHS	Summer	Summer	0.13542	0.13542	0.14083	
50	Seasonal Energy Charge	Secondary	MOSHS	Winter	Winter	0.04364	0.04364	0.04538	
51									
52	Seasonal Energy Charge	Secondary	MOSDS /MOSND /MOSDSW	Summer	First 180 Hours Use	0.09494	0.09494	0.09873	
53	Seasonal Energy Charge - Blk 2	Secondary	MOSDS /MOSND /MOSDSW	Summer	Over 180 Hours Use	0.07144	0.07144	0.07430	
54									
55	Seasonal Energy Charge	Secondary	MOSDS /MOSND /MOSDSW	Winter	First 180 Hours Use	0.04364	0.04364	0.04538	
56	Seasonal Energy Charge - Blk 2	Secondary	MOSDS /MOSND /MOSDSW	Winter	Over 180 Hours Use	0.04364	0.04364	0.04538	
57									
58	Seasonal Energy Charge	Primary	MOSGP	Summer	First 180 Hours Use	0.08907	0.08907	0.09263	
59	Seasonal Energy Charge - Blk 2	Primary	MOSGP	Summer	Over 180 Hours Use	0.06702	0.06702	0.06970	
60									
61	Seasonal Energy Charge	Primary	MOSGP	Winter	First 180 Hours Use	0.04193	0.04193	0.04361	
62	Seasonal Energy Charge - Blk 2	Primary	MOSGP	Winter	Over 180 Hours Use	0.04193	0.04193	0.04361	
63									
64	Primary Discount	Secondary/Primary	MOSDS /MOSND /MOSGP /MOSHS	Winter/Summer	PRIMARY DISCOUNT	-1.00	-1.00	-1.00	
65									
66									
67									
68									
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68	MOSGS ;MOSNS ;MOSI	Summer	100.000%	1.04%	4.26%
69	MOSGS ;MOSNS ;MOSI	Winter	100.000%	1.60%	4.40%
70	MOSHS	Summer	100.000%	0.00%	0.00%
71	MOSHS	Winter	100.000%	0.00%	0.00%
72	MOSDS ;MOSND ;MOSI	Summer	100.000%	0.91%	4.23%
73	MOSDS ;MOSND ;MOSI	Winter	100.000%	1.21%	4.31%
74	MOSGP	Summer	100.000%	1.07%	4.31%
75	MOSGP	Winter	100.000%	1.09%	4.34%
76	Winter Price Below Summer (SUM-WIN)/SUM		22.792%	22.515%	22.723%
77	SGS Overall Change			1.156%	4.292%

79	Revenue	\$ 116,692,908	\$ 118,041,385	\$ 121,700,941
80	Change in Revenue			\$ 5,008,032.71
81				
82	Proposed change per Revenue Summary			\$ 5,009,620.00
83				(\$1,587)
84				
85	Net Metering Credit	\$ (46,221.39)		
86	Parallel Generation Credit	\$ (3,236.40)		
87	Customer Revenue Share	\$ (407.49)		
88	Reduced Commitment Surcharge	\$ 7.47		
89	EDR Credit	\$ (6,285.16)		
90	Ex FAC/Line Extension	\$ 216.00		
91		\$ 116,636,981		

	B	C	D	E	F	G	H	I
1	Evergy - Missouri West							
2	Residential							
3								
4	Case No. ER-2022-0130							
5	Status Direct							
6								
7	10.84%							
8	INPUT FOR MODEL							
	JURIS INCREASE (%)							
	7.39%							
9	Charge	Usage	Rate Code	Season	Charge Values	Current Rates	Rates with Increase	Proposed Rates
10								
11	Customer Charge/ Other Meter	General Use, with Net Metering	MORG /MORN	Summer/Winter	General Use, with Net Metering	11.47	16.00	16.00
12	Customer Charge/ Other Meter	Space Heating	MORH /MORNH /MORHP	Summer/Winter	Space Heating - One Meter, with Net Metering	11.47	16.00	16.00
13	Customer Charge/ Other Meter	Other Use	MORO	Summer/Winter	Other Use	17.18	23.97	23.97
14	Customer Charge/ Other Meter	Time of Use	MORT	Summer/Winter	Residential	11.47	16.00	16.00
15								
16	Energy Charge - Blk 1/ On-Peak	General Use, with Net Metering	MORG /MORN	Summer	First 600 kWh	0.10938	0.10938	0.11752
17	Energy Charge - Blk 2/ Off-Peak	General Use, with Net Metering	MORG /MORN	Summer	Next 400 kWh	0.10938	0.10938	0.11752
18	Energy Charge - Blk 3/ Shoulder	General Use, with Net Metering	MORG /MORN	Summer	Over 1000 kWh	0.11927	0.11927	0.12815
19								
20	Energy Charge - Blk 1/ On-Peak	General Use, with Net Metering	MORG /MORN	Winter	First 600 kWh	0.09888	0.09888	0.10623
21	Energy Charge - Blk 2/ Off-Peak	General Use, with Net Metering	MORG /MORN	Winter	Next 400 kWh	0.07800	0.07800	0.08380
22	Energy Charge - Blk 3/ Shoulder /Super Off-Peak	General Use, with Net Metering	MORG /MORN	Winter	Over 1000 kWh	0.07800	0.07800	0.08380
23								
24	Energy Charge - Blk 1/ On-Peak	Space Heating - One Meter, with Net Metering, or Parallel Gen	MORH /MORNH /MORHP	Summer	First 600 kWh	0.11927	0.11927	0.12815
25	Energy Charge - Blk 2/ Off-Peak	Space Heating - One Meter, with Net Metering, or Parallel Gen	MORH /MORNH /MORHP	Summer	Next 400 kWh	0.11927	0.11927	0.12815
26	Energy Charge - Blk 3/ Shoulder /Super Off-Peak	Space Heating - One Meter, with Net Metering, or Parallel Gen	MORH /MORNH /MORHP	Summer	Over 1000 kWh	0.11927	0.11927	0.12815
27								
28	Energy Charge - Blk 1/ On-Peak	Space Heating - One Meter, with Net Metering, or Parallel Gen	MORH /MORNH /MORHP	Winter	First 600 kWh	0.09888	0.09888	0.10623
29	Energy Charge - Blk 2/ Off-Peak	Space Heating - One Meter, with Net Metering, or Parallel Gen	MORH /MORNH /MORHP	Winter	Next 400 kWh	0.06035	0.06035	0.06484
30	Energy Charge - Blk 3/ Shoulder /Super Off-Peak	Space Heating - One Meter, with Net Metering, or Parallel Gen	MORH /MORNH /MORHP	Winter	Over 1000 kWh	0.05005	0.05005	0.05378
31								
32	Energy Charge - Blk 1/ On-Peak	Other Use (all kWh)	MORO	Summer	SUMMER	0.14664	0.14664	0.15755
33	Energy Charge - Blk 1/ On-Peak	Other Use (all kWh)	MORO	Winter	WINTER	0.10996	0.10996	0.11814
34								
35	Energy Charge - Blk 1/ On-Peak	Residential - Time of Use	MORT	Summer	Peak	0.26577	0.26577	0.31142
36	Energy Charge - Blk 2/ Off-Peak	Residential - Time of Use	MORT	Summer	Off-Peak	0.08859	0.08859	0.10381
37	Energy Charge - Blk 3/ Shoulder /Super Off-Peak	Residential - Time of Use	MORT	Summer	Super-Off Peak	0.04429	0.04429	0.05190
38								
39	Energy Charge - Blk 1/ On-Peak	Residential - Time of Use	MORT	Winter	Peak	0.21629	0.21629	0.15571
40	Energy Charge - Blk 2/ Off-Peak	Residential - Time of Use	MORT	Winter	Off-Peak	0.08727	0.08727	0.07786
41	Energy Charge - Blk 3/ Shoulder /Super Off-Peak	Residential - Time of Use	MORT	Winter	Super-Off Peak	0.03667	0.03667	0.05190
42								
43								
44								
45								
46								
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General Use, with Net Metering	Summer	100.000%	3.368%	10.175%
General Use, with Net Metering	Winter	100.000%	5.841%	12.179%
Space Heating - One Meter, with Net Metering, or Parallel Gen	Summer	100.000%	2.874%	9.774%
Space Heating - One Meter, with Net Metering, or Parallel Gen	Winter	100.000%	4.284%	10.918%
Other Use (all kWh)	Summer	100.000%	#DIV/0!	#DIV/0!
Other Use (all kWh)	Winter	100.000%	#DIV/0!	#DIV/0!
Winter Price Below Summer (SUM-WIN)/SUM		25.050%	23.620%	24.108%
RES Overall Change			4.250%	10.841%

Revenue	\$ 376,086,292.10	\$ 392,069,511.52	\$ 416,859,656.06
Change in Revenue			\$ 40,773,363.96
Proposed change per Revenue Summary			\$ 40,777,992.85
			(\$4,629)
Manual Bill			
Net Metering Credit	\$ (115,036.41)		
Parallel Generation Credit	\$ (66.92)		
	\$ 375,971,188.77		

	B	C	D	E	F	G	H	
1	Evergy - Missouri West							
2	Lighting (Metered)							
3								
4	Case No.			ER-2022-0130				
5	Status			Direct				
6								
7								
8								
9						<i>INPUT FOR MODEL</i>		
						0.00%	6.39%	
10	Charge	Rate Code	Season	Tariff Language	Current Rates	Rates with Increase	Proposed Rates	
11	Customer Charge/ Other Meter	MO971	Summer/Winter	Service Charge (Frozen) - Rate Code (MO971):	7.20	7.20	7.66	
12	Secondary Meter Base Installation	MO972 /MO973	Summer/Winter	Secondary Meter Base Installation - per meter (Frozen)	3.07	3.07	3.27	
13			Summer/Winter	Meter Installation with Current Transformers - per meter (Frozen)	5.32	5.32	5.66	
14	Customer Charge/ Other Meter	MO972	Summer/Winter	Other Meter - per meter (Frozen)	11.32	11.32	12.04	
15	Customer Charge/ Other Meter	MOOLL	Summer/Winter	Customer Charge - Rate Code (MOOLL):	10.08	10.08	10.72	
16								
17	B: ENERGY CHARGE							
18	Energy Charge - Blk 1/ On-Peak	MO971	Summer/Winter	Rate Code (MO971) (Frozen):	0.11880	0.11880	0.12639	
19	Energy Charge - Blk 1/ On-Peak	MO972	Summer/Winter	Rate Code (MO972) (Frozen):	0.06139	0.06139	0.06531	
20	Energy Charge - Blk 1/ On-Peak	MO973	Summer/Winter	Rate Code (MO973) (Frozen):	0.07373	0.07373	0.07844	
21	Energy Charge - Blk 1/ On-Peak	MOOLL	Summer/Winter	Rate Code (MOOLL):	0.05639	0.05639	0.06000	
22								
23		MO971	Summer		100.000%	0.00%	6.389%	
24		MO971	Winter		100.000%	0.00%	6.389%	
25		MO972	Summer		100.000%	0.00%	6.390%	
26		MO972	Winter		100.000%	0.00%	6.389%	
27		MO973	Summer		100.000%	0.00%	6.405%	
28		MO973	Winter		100.000%	0.00%	6.403%	
29		MOOLL	Summer		100.000%	0.00%	6.395%	
30		MOOLL	Winter		100.000%	0.00%	6.397%	
31		Winter Price Below Summer (SUM-WIN)/SUM			9.587%	9.587%	9.588%	
32		Lighting Overall Change				0.000%	6.393%	
33								
34				Revenue	\$ 97,006.76	\$ 97,006.76	\$ 103,208.04	
35				Change in Revenue			\$ 6,201.28	
36								
37				Proposed change per Revenue Summary			\$ 6,201.68	
38							\$ (0.40)	
39								
40				Ex FAC/ Line extension	\$ 1,476.00			
41					\$ 98,482.76	non-BD revenue		
42								

	B	D	E	G	J	L	N	O	
1	Evergy - Missouri West								
2	Lighting (Unmetered)							4.00%	% for MV
3								1.92%	% for all other non-LED
4	ER-2022-0130				Juris Increase (%) =	6.39%	0.00%	% for permanent LED and traffic signals	
5	Direct						22.52%	% for transitional LED* - moving pricing toward	
6									
7	Rate		Tariff		Current Rate	Proposed Rate	%Δ	*MRU/CCB Item Type	
8	Schedule	Rate Code	Sheet No.	Description	Monthly	Monthly			
9	L&P MSL	MOS22	42	Mercury Vapor Lamp - 400 watt (estimated 19,100 lumens)	\$ 14.90	\$ 15.50	4.027%	S085	
10	L&P PAL	Additional Facilities							
11	L&P MSL	MOSJB	41	14' Decorative Pole Ug (1)	\$ 12.23	\$ 12.46	1.881%	S109	
12	L&P MSL	MOSJB	41	Underground Circuit, in dirt	\$ 0.05	\$ 0.05	-7.253%	S113	
13	L&P MSL	MOSJB	41	Special Contract Pole (1)	\$ 21.56	\$ 21.98	1.940%	S116	
14									
15									
16	L&P SL	MOS16	43	Unmetered HPS 150W - at 63 per kWh energy on MO972	\$ 3.85	\$ 3.92	1.818%	S036	
17	L&P SL	MOS25	43	HPS 150W Street Light	\$ 14.00	\$ 14.27	1.929%	S114	
18	L&P SL	MOS25	43	HPS 150W Street Light	\$ 17.34	\$ 17.67	1.903%	S115	
19	L&P SL	MOS26	43	Misc Street Light - 295W Incandescent	\$ 26.96	\$ 27.48	1.929%	S099	
20									
21	L&P TR	MOS18	44	3-section-8" signal face (R,Y,G) (90 Watts) - Partial Operation	\$ 4.05	\$ 4.05	0.000%	S040	
22	L&P TR	MOS18	44	3-section-12" signal face (R,Y,G) (2 @ 90 watts, 1 @ 135 watts) - Partial Operation	\$ 4.70	\$ 4.70	0.000%	S041	
23	L&P TR	MOS18	44	3-section-signal face (R,Y,G) optically oprogrammed (3 @ 150 Watts) - Partial Operation	\$ 6.70	\$ 6.70	0.000%	S043	
24	L&P TR	MOS18	44	2-section-signal face (Walk/Don't Walk) (2 @ 90 watts) - Partial Operation	\$ 3.23	\$ 3.23	0.000%	S044	
25	L&P TR	MOS18	44	2-section-school signal (2 @ 90 watts) - Partial Operation	\$ 0.29	\$ 0.29	0.000%	S046	
26	L&P TR	MOS18	44	1-section-school signal (1 @ 90 watts) - Partial Operation	\$ 0.15	\$ 0.15	0.000%	S047	
27	L&P TR	MOS18	44	1-section-signal face (special function) (1 @ 90 watts) - Non-Continuous Operation but has same	\$ 1.62	\$ 1.62	0.000%	S048	
28	L&P TR	MOS20	44	3-section-12" signal face (R,Y,G) (2 @ 90 watts, 1 @ 135 watts) - Continuous Operation	\$ 5.66	\$ 5.66	0.000%	S056	
29	L&P TR	MOS20	44	5-section-signal face (R,Y,G,Y arrow, G arrow) (4@ 90 watts, 1 @ 135 watts) - Continuous Ope	\$ 7.36	\$ 7.36	0.000%	S059	
30	L&P TR	MOS20	44	3-section-8" signal face (R,Y,G) (90 Watts) - Continuous Operation	\$ 4.86	\$ 4.86	0.000%	S060	
31	L&P TR	MOS20	44	1-section-signal face (special function) (1 @ 90 watts) - Continuous Operation	\$ 1.62	\$ 1.62	0.000%	S061	
32	L&P TR	MOS20	44	1-section-signal face (flashing beacon) (1 @ 90 watts) - Continuous Operation	\$ 2.43	\$ 2.43	0.000%	S062	
33	L&P TR	MOS20	44	Special Contract - (R,Y,G,Y arrow, G arrow) (4 @ 90 watts, 1 @ 135 watts), 99 kWh * kWh pricing	\$ 7.28	\$ 7.28	0.000%	S063	
34	L&P TR	MOS18	44	Special Contract - traffic signal, 34 kWh * kWh pricing	\$ 2.50	\$ 2.50	0.000%	S049	
35	L&P TR	MOS18	44	Special Contract - traffic signal, 87 kWh * kWh pricing	\$ 6.40	\$ 6.40	0.000%	S050	
36	L&P TR	MOS18	44	Special Contract - optically programmed (3 @ 150 watts), 95 kWh * kWh pricing	\$ 6.99	\$ 6.99	0.000%	S051	
37	L&P TR	MOS28		CATV Power Supply	\$ 68.00	\$ 68.00	0.000%	S120	
38									
39	L&P PAL	MOS30, MOS31	47	Private Area - Standard - MV - 175 W (7,650 lumens)	\$ 11.08	\$ 11.52	3.971%	S001	
40	L&P PAL	MOS31	47	Private Area - Standard - MV - 400 W (19,100 lumens)	\$ 22.41	\$ 23.31	4.016%	S002	
41	L&P PAL	MOS30, MOS31	47	Private Area - Standard - HPS - 150 W (14,400 lumens)	\$ 14.00	\$ 14.27	1.929%	S003	
42	L&P PAL	MOS30, MOS31	47	Private Area - Roadway - HPS - 150 W (14,400 lumens)	\$ 16.94	\$ 17.27	1.948%	S004	
43	L&P PAL	MOS31	47	Private Area - Roadway - HPS - 250 W (24,750 lumens)	\$ 18.89	\$ 19.25	1.906%	S005	
44	L&P PAL	MOS30, MOS31	47	Private Area - Roadway - HPS - 400 W (45,000 lumens)	\$ 21.63	\$ 22.05	1.942%	S006	
45	L&P PAL	MOS31	47	Special Contract - Private Area - HPS - 400 W (45,000 lumens)	\$ 19.09	\$ 19.46	1.938%	S024	
46	L&P PAL	MOS32, MOS33	47	Directional Flood - Standard - MV - 400 W (19,100 lumens)	\$ 25.26	\$ 26.27	3.998%	S007	
47	L&P PAL	MOS33	47	Directional Flood - Standard - MV - 1,000 W (47,500 lumens)	\$ 50.12	\$ 52.12	3.990%	S008	
48	L&P PAL	MOS32, MOS33	47	Directional Flood - Standard - HPS - 150 W (14,400 lumens)	\$ 14.00	\$ 14.27	1.929%	S009	
49	L&P PAL	MOS32, MOS33	47	Directional Flood - Standard - HPS - 400 W (45,000 lumens)	\$ 25.44	\$ 25.93	1.926%	S010	
50	L&P PAL	MOS32, MOS33	47	Directional Flood - Standard - HPS - 1,000 W (126,000 lumens)	\$ 54.31	\$ 55.35	1.915%	S011	
51	L&P PAL	MOS32, MOS33	47	Directional Flood - Standard - MH - 400 W (23,860 lumens)	\$ 26.96	\$ 27.48	1.929%	S012	
52	L&P PAL	MOS32, MOS33	47	Directional Flood - Standard - MH - 1,000 W (82,400 lumens)	\$ 50.12	\$ 51.08	1.915%	S013	
53	L&P PAL	MOS35	47	Special - Shoebox - MH - 1000 W (82,400 lumens)	\$ 59.90	\$ 61.05	1.920%	S015	
54	L&P PAL	MOS35	47	Special - Shoebox - HPS - 400 W - (45,000 lumens)	\$ 37.27	\$ 37.99	1.932%	S017	
55	L&P PAL	MOS35		Special Contract - PAL	\$ 8.56	\$ 8.72	1.869%	S021	
56	L&P PAL								
57	L&P PAL	Additional Facilities							
58	L&P PAL	MOSJR, MOSJC	48	Wood - 35' - OH - 1 span	\$ 3.93	\$ 4.01	2.036%	S105	
59	L&P PAL	MOSJR, MOSJC	48	Wood - 35' - UG - 100'	\$ 9.55	\$ 9.73	1.885%	S106	
60	L&P PAL	MOSJC	48	Steel - 30' - UG - 1 span or 100'	\$ 28.88	\$ 29.43	1.904%	S107	
61	L&P PAL	MOSJC	48	Decorative - 14' - UG - 100'	\$ 46.70	\$ 47.60	1.927%	S109	
62	L&P PAL	MOSJC	48	Bronze (round) - 39' - UG - 1 span or 100'	\$ 50.71	\$ 51.68	1.913%	S110	
63	L&P PAL	MOSJR, MOSJC	48	Additional UG Secondary - 50'	\$ 0.02	\$ 0.02	-15.966%	S113	
64	L&P PAL	MOSJR, MOSJC		Transfer Charge/Special Facility	\$ 1.00	\$ 1.02	2.000%	S200	
65									
66	MPS MSL	MON16	88	7700L, MV, open glassware, steel pole, UG	\$ 16.76	\$ 17.43	4.029%	M209	
67	MPS MSL	MON20	88	12000L, HPS, open glassware, existing wood pole, UG	\$ 12.61	\$ 12.85	1.917%	M301	
68	MPS MSL	MON36	89	8000L, SV, enclosed fixture, steel pole, UG	\$ 20.85	\$ 21.25	1.943%	M361	
69	MPS MSL	MON36	89	13500L, SV, enclosed fixture, steel pole, UG	\$ 21.45	\$ 21.86	1.919%	M369	

	B	D	E	G	J	L	N	O
7	Rate		Tariff		Current Rate	Proposed Rate	%Δ	
8	Schedule	Rate Code	Sheet No.	Description	Monthly	Monthly		*MRU/CBB Item Type
70	MPS MSL	MON30	89	13500L, SV, open fixture, existing wood, OH	\$ 13.27	\$ 13.53	1.934%	M324
71	MPS MSL	MON30	89	13500L, SV, open fixture, wood, OH	\$ 13.69	\$ 13.95	1.899%	M370
72	MPS MSL	MON36	89	25500L, SV, enclosed fixture, steel pole, UG	\$ 23.47	\$ 23.92	1.910%	M377
73	MPS MSL	MON36	89	50000L, SV, enclosed fixture, steel pole, OH	\$ 22.97	\$ 23.41	1.923%	M380
74	MPS MSL	MON36	89	Decorative Lighting	\$ 1.00	\$ 1.02	2.000%	MDCA
75	MPS MSL	MON66	89	8000L, HPS, Acorn, 14' Décor Pole, UG	\$ 32.50	\$ 33.13	1.925%	M384
76	MPS MSL	MON66	89	25500L, HPS, Acorn, 14' Décor Pole, UG	\$ 33.40	\$ 34.04	1.919%	M385
77	MPS MSL	MON90		Special Contract - Blinker Lights - Grandview	\$ 13.42	\$ 13.42	0.000%	M910
78	MPS MSL	MON90		Special Contract - Festoon Lighting	\$ 0.64	\$ 0.64	0.000%	M912
79	MPS MSL	MON90		Special Contract - Festoon Lighting	\$ 0.82	\$ 0.82	0.000%	M913
80	MPS MSL	MON90		Special Contract - Festoon Lighting	\$ 0.87	\$ 0.87	0.000%	M914
81	MPS MSL	MON90		Special Contract - Festoon Lighting	\$ 0.66	\$ 0.66	0.000%	M915
82	MPS MSL	MON90		Special Contract - Unmetered Traffic Signal	\$ 17.06	\$ 17.06	0.000%	M920
83	MPS MSL	MON91		Special Contract - 100 Watt Streetlight, concrete pole, UG - Liberty	\$ 35.46	\$ 36.14	1.920%	M929
84	MPS MSL	MON91		Special Contract - White Way Streetlight	\$ 8.37	\$ 8.53	1.920%	M930
85	MPS MSL	MON91		Special Contract - Multiple Enclosed Fixtures, WP, OH	\$ 7.62	\$ 7.77	1.920%	M931
86	MPS MSL	MON91		Special Contract - White Way - Clinton Streetlight	\$ 6.85	\$ 6.98	1.920%	M942
87	MPS MSL	MON91		Special Contract - 100 Watt Acorn, 14' pole - Longview Farms	\$ 14.17	\$ 14.44	1.920%	M956
88	MPS MSL	MON91		Special Contract - 250 Watt Decorative Acorn Metal Halide #1 - Sedalia	\$ 33.40	\$ 34.04	1.920%	M957
89	MPS MSL	MON91		Special Contract - 251 Watt Decorative Acorn Metal Halide #2 - Sedalia	\$ 45.26	\$ 46.13	1.920%	M958
90								
91	MPS PAL	MON26, MON27	91	7700L, MV, open glassware, WP, OH	\$ 11.31	\$ 11.76	4.002%	M500
92	MPS PAL	MON26, MON27	91	7700L, MV, open glassware, existing WP, OH	\$ 10.89	\$ 11.33	4.033%	M501
93	MPS PAL	MON28, MON29	91	7700L, MV, open glassware, SP, OH	\$ 15.41	\$ 16.02	3.987%	M502
94	MPS PAL	MON26, MON27	91	7700L, MV, streamlined fixture, WP, OH	\$ 13.04	\$ 13.56	4.008%	M503
95	MPS PAL	MON29	91	7700L, MV, streamlined fixture, SP, OH	\$ 17.13	\$ 17.81	3.990%	M504
96	MPS PAL	MON26, MON27	91	10500L, MV, enclosed fixture, WP, OH	\$ 15.22	\$ 15.83	4.030%	M505
97	MPS PAL	MON29	91	10500L, MV, enclosed fixture, SP, OH	\$ 19.31	\$ 20.08	4.010%	M506
98	MPS PAL	MON26, MON27	91	21000L, MV, enclosed fixture, WP, OH	\$ 19.41	\$ 20.19	4.023%	M507
99	MPS PAL	MON29	91	21000L, MV, enclosed fixture, SP, OH	\$ 23.29	\$ 24.22	3.997%	M508
100	MPS PAL	MON26, MON27	91	54000L, MV, enclosed fixture, WP, OH	\$ 32.65	\$ 33.95	3.995%	M509
101	MPS PAL	MON29	91	54000L, MV, enclosed fixture, SP, OH	\$ 35.23	\$ 36.64	4.010%	M510
102	MPS PAL	MON80, MON81	91	12000L, SV, open glassware, WP, OH	\$ 13.89	\$ 14.15	1.890%	M600
103	MPS PAL	MON80, MON81	91	12000L, SV, open glassware, existing WP, OH	\$ 13.47	\$ 13.73	1.924%	M601
104	MPS PAL	MON82, MON83	91	12000L, SV, open glassware, SP, OH	\$ 17.98	\$ 18.33	1.942%	M602
105	MPS PAL	MON80, MON81	91	12000L, SV, streamlined fixture, WP, OH	\$ 15.61	\$ 15.91	1.922%	M603
106	MPS PAL	MON82, MON83	91	12000L, SV, streamlined fixture, SP, OH	\$ 19.70	\$ 20.08	1.912%	M604
107	MPS PAL	MON82	91	Decorative Lighting	\$ 1.00	\$ 1.02	2.000%	MDCA
108	MPS PAL	MON81	91	36000L, SV, enclosed fixture, WP, OH	\$ 21.82	\$ 22.24	1.940%	M605
109	MPS PAL	MON48, MON49	92	5000L, SV, open glassware or enclosed fixture, WP, OH	\$ 13.11	\$ 13.36	1.926%	M643
110	MPS PAL	MON48, MON49	92	8000L, SV, open glassware or enclosed fixture, WP, OH	\$ 13.70	\$ 13.96	1.904%	M645
111	MPS PAL	MON48, MON49	92	8000L, SV, open glassware or enclosed fixture, existing WP, OH	\$ 13.28	\$ 13.54	1.939%	M646
112	MPS PAL	MON48, MON49	92	8000L, SV, open glassware or enclosed fixture, SP, OH	\$ 17.79	\$ 18.13	1.901%	M647
113	MPS PAL	MON48, MON49	92	13500L, SV, open glassware or enclosed fixture, WP, OH	\$ 14.69	\$ 14.97	1.918%	M648
114	MPS PAL	MON48, MON49	92	13500L, SV, open glassware or enclosed fixture, existing WP, OH	\$ 14.27	\$ 14.55	1.950%	M654
115	MPS PAL	MON48, MON49	92	13500L, SV, open glassware or enclosed fixture, SP, OH	\$ 18.78	\$ 19.14	1.917%	M649
116	MPS PAL	MON44, MON45	92	25500L, SV, enclosed fixture, WP, OH	\$ 18.46	\$ 18.81	1.919%	M650
117	MPS PAL	MON46, MON47	92	25500L, SV, enclosed fixture, SP, OH	\$ 22.55	\$ 22.98	1.910%	M651
118	MPS PAL	MON47	92	Decorative Lighting	\$ 1.00	\$ 1.02	2.000%	MDCA
119	MPS PAL	MON44, MON45	92	50000L, SV, enclosed fixture, WP, OH	\$ 22.55	\$ 22.98	1.918%	M652
120	MPS PAL	MON46, MON47	92	50000L, SV, enclosed fixture, SP, OH	\$ 26.43	\$ 26.93	1.901%	M653
121	MPS PAL	MON44, MON45	92	Directional Flood, 27500L, SV, enclosed fixture, existing WP, OH	\$ 34.44	\$ 35.10	1.919%	M675
122	MPS PAL	MON44, MON45	92	Directional Flood, 27500L, SV, enclosed fixture, WP, OH	\$ 36.16	\$ 36.86	1.927%	M676
123	MPS PAL	MON44, MON45	92	Directional Flood, 50000L, SV, enclosed fixture, existing WP, OH	\$ 38.81	\$ 39.56	1.926%	M677
124	MPS PAL	MON44, MON45	92	Directional Flood, 50000L, SV, enclosed fixture, WP, OH	\$ 40.53	\$ 41.31	1.914%	M678
125	MPS PAL	MON44, MON45	92	Directional Flood, 140000L, SV, enclosed fixture, existing WP, OH	\$ 65.52	\$ 66.78	1.918%	M679
126	MPS PAL	MON45	92	Directional Flood, 140000L, SV, enclosed fixture, WP, OH	\$ 67.25	\$ 68.54	1.921%	M680
127	MPS PAL	MON72, MON73	92	20500L, MH, enclosed fixture, existing WP, OH	\$ 37.09	\$ 37.81	1.932%	M681
128	MPS PAL	MON73	92	20500L, MH, enclosed fixture, WP, OH	\$ 38.82	\$ 39.56	1.915%	M682
129	MPS PAL	MON73	92	36000L, MH, enclosed fixture, existing WP, OH	\$ 39.66	\$ 40.42	1.908%	M684
130	MPS PAL	MON72, MON73	92	36000L, MH, enclosed fixture, WP, OH	\$ 41.38	\$ 42.18	1.923%	M685
131	MPS PAL	MON75	92	36000L, MH, enclosed fixture, SP, OH	\$ 45.26	\$ 46.13	1.917%	M686
132	MPS PAL	MON73	92	110000L, MH, enclosed fixture, existing WP, OH	\$ 67.23	\$ 68.52	1.924%	M687
133	MPS PAL	MON73	92	110000L, MH, enclosed fixture, WP, OH	\$ 68.95	\$ 70.27	1.913%	M688
134	MPS PAL	MON75	92	110000L, MH, enclosed fixture, SP, OH	\$ 72.83	\$ 74.22	1.913%	M689
135	MPS MSL/MPS PAL							
136	MPS MSL/MPS PAL	Additional Facilities						
137	MPS MSL/MPS PAL	MONWR, MONWC	90, 93	Wood pole and one span of OH wire - OH	\$ 1.72	\$ 1.76	2.177%	M800
138	MPS MSL/MPS PAL	MONSR, MONSC	90, 93	Break away bases for steel poles - OH & UG	\$ 2.73	\$ 3.35	22.859%	BKWY

B		D		E	G	J		L	N	O
7	Rate			Tariff			Current Rate	Proposed Rate	%Δ	*MRU/CBB Item Type
8	Schedule	Rate Code		Sheet No.	Description	Monthly	Monthly			
139	MPS MSL/MPS PAL	MONWC		90, 93	Rock removal - UG	\$ 0.19	\$ 0.20		2.987%	M804
140	MPS MSL	MONWR		90	30 ft. requiring 35 f. WP	\$ 1.68	\$ 1.71		1.786%	M807
141	MPS MSL	MONWC		90	40 ft. requiring 45 ft. WP	\$ 5.03	\$ 5.13		1.988%	M811
142	MPS MSL	MONSC		90	40 ft. requiring 40 ft SP	\$ 13.00	\$ 13.25		1.923%	M812
143	MPS MSL/MPS PAL	MONSC		90, 93	Steel pole and one span of OH wire - OH	\$ 5.60	\$ 5.71		1.964%	M802
144	MPS PAL	MONWR, MONWC, MONSR, MONSC		93	Underground wiring for private lighting, WP	\$ 0.05	\$ 0.06		10.701%	M806
145	MPS PAL	MONWR, MONWC		93	Underground wiring for private lighting - per 100', WP	\$ 5.47	\$ 5.58		2.011%	UNPV
146	MPS PAL	MONWR, MONWC, MONSC		93	Underground wiring for private lighting under concrete per foot - UG, WP	\$ 0.25	\$ 0.25		1.338%	M805
147	MPS MSL/MPS PAL	MONWR, MONWC		Credit of 90a/93a	Credit - Wood pole and one span of OH wire - OH	\$ (1.72)	\$ (1.76)		2.177%	M954
148	MPS PAL	MONSC		Credit of 93b	Credit - Steel pole and one span of OH wire - OH	\$ (5.60)	\$ (5.71)		1.964%	M955
149										
150	MPS MSL/MPS PAL	MON84, MON85		95	Customer-Owned Non-Standard 100W	\$ 2.26	\$ 2.30		1.770%	M709
151	MPS MSL/MPS PAL	MON84, MON85		95	Customer-Owned Non-Standard 150W	\$ 3.39	\$ 3.46		2.065%	M710
152	MPS MSL/MPS PAL	MON85		95	Customer-Owned Non-Standard 175W	\$ 3.95	\$ 4.03		2.025%	M711
153	MPS MSL/MPS PAL	MON85		95	Customer-Owned Non-Standard 250W	\$ 5.25	\$ 5.35		1.905%	M712
154	MPS MSL/MPS PAL	MON85		95	Customer-Owned Non-Standard 360W	\$ 7.39	\$ 7.53		1.894%	M713
155	MPS MSL/MPS PAL	MON85		95	Customer-Owned Non-Standard 400W	\$ 8.24	\$ 8.40		1.942%	M714
156	MPS MSL/MPS PAL	MON85		95	Customer-Owned Non-Standard 1000W	\$ 22.57	\$ 23.00		1.905%	M715
157	MPS MSL/MPS PAL	MON85		95	Decorative lighting	\$ 1.00	\$ 1.02		2.000%	MDCA
158										
159	MSL LED	MOMLL		150	5000 Lumen LED (Class A) (Type V pattern)	\$ 19.36	\$ 19.36		0.000%	L0AAG
160	MSL LED	MOMLL		150	5000 Lumen LED (Class B) (Type II pattern)	\$ 19.36	\$ 19.36		0.000%	L0BAG
161	MSL LED	MOMLL		150	7500 Lumen LED (Class C) (Type III pattern)	\$ 21.77	\$ 21.77		0.000%	L0CAG
162	MSL LED	MOMLL		150	12500 Lumen LED (Class D) (Type III pattern)	\$ 23.23	\$ 23.23		0.000%	L0DAG
163	MSL LED	MOMLL		150	24500 Lumen LED (Class E) (Type III pattern)	\$ 25.16	\$ 25.16		0.000%	L0EAG
164	MSL LED	MOMLL		150	5000 Lumen LED (Class A) (Type V pattern)	\$ 11.50	\$ 14.09		22.522%	L0ABG
165	MSL LED	MOMLL		150	5000 Lumen LED (Class B) (Type II pattern)	\$ 11.50	\$ 14.09		22.522%	L0BBG
166	MSL LED	MOMLL		150	7500 Lumen LED (Class C) (Type III pattern)	\$ 12.30	\$ 15.43		25.447%	L0CBG
167	MSL LED	MOMLL		150	12500 Lumen LED (Class D) (Type III pattern)	\$ 16.40	\$ 18.65		13.720%	L0DBG
168	MSL LED	MOMLL		150	24500 Lumen LED (Class E) (Type III pattern)	\$ 19.70	\$ 21.50		9.137%	L0EBG
169	MSL LED	MOMLL		150	5000 Lumen LED (Class A) (Type II pattern)	\$ 10.65	\$ 10.65		0.000%	L0AEG
170	MSL LED	MOMLL		150	5000 Lumen LED (Class B) (Type II pattern)	\$ 10.65	\$ 10.65		0.000%	L0BEG
171	MSL LED	MOMLL		150	7500 Lumen LED (Class C) (Type III pattern)	\$ 11.42	\$ 11.42		0.000%	L0CEG
172	MSL LED	MOMLL		150	12500 Lumen LED (Class D) (Type III pattern)	\$ 15.39	\$ 15.39		0.000%	L0DEG
173	MSL LED	MOMLL		150	24500 Lumen LED (Class E) (Type III pattern)	\$ 18.58	\$ 18.58		0.000%	L0EEG
174	MSL LED	MOMLL		150.1	4300 Lumen LED (Class K) (Acorn Style)	\$ 62.14	\$ 62.14		0.000%	L0KDG
175	MSL LED	MOMLL		150.1	10000 Lumen LED (Class L) (Acorn Style)	\$ 63.54	\$ 63.54		0.000%	L0LDG
176	MSL LED	MOMLL			Decorative lighting	\$ 1.00	\$ 1.02		2.000%	MDCA
177	MSL LED									
178	MSL LED	Optional Equipment								
179	MSL LED	MOMLL		150.1	Metal pole instead of wood pole	\$ 5.15	\$ 5.15		0.000%	OMPLG
180	MSL LED	MOMLL		150.1	Underground Service extension, under sod	\$ 4.84	\$ 4.84		0.000%	OEUSG
181	MSL LED	MOMLL		150.1	Underground Service extension, under concrete	\$ 23.40	\$ 23.40		0.000%	OEUCG
182	MSL LED	MOMLL		150.1	Rock Removal	\$ 19.36	\$ 19.36		0.000%	OEACG
183	MSL LED	MOMLL		150.1	Breakaway Base	\$ 3.35	\$ 3.35		0.000%	OBABG
184	MSL LED	MOMLL		150.2	Special Mounting Heights - Between 31 and 41 ft. - Wood Pole	\$ 2.06	\$ 2.06		0.000%	SW31
185	MSL LED	MOMLL		150.2	Special Mounting Heights - Between 31 and 41 ft. - Steel Pole	\$ 3.27	\$ 3.27		0.000%	SM31
186	MSL LED	MOMLL		150.2	Special Mounting Heights - Greater than 41 ft. - Wood Pole	\$ 4.35	\$ 4.35		0.000%	SW41
187	MSL LED	MOMLL		150.2	Special Mounting Heights - Greater than 41 ft. - Steel Pole	\$ 7.64	\$ 7.64		0.000%	SM41
188										
189	MSL PL	MORPL, MOCPL		152	4500 Lumen LED (Type A-PAL)	\$ 11.27	\$ 11.27		0.000%	L45AP
190	MSL PL	MORPL, MOCPL		152	8000 Lumen LED (Type C-PAL)	\$ 14.66	\$ 14.66		0.000%	L80CP
191	MSL PL	MORPL, MOCPL		152	14000 Lumen LED (Type D-PAL)	\$ 19.32	\$ 19.32		0.000%	L14DP
192	MSL PL	MORPL, MOCPL		152	10000 Lumen LED (Type C-FL)	\$ 14.66	\$ 14.66		0.000%	L10CF
193	MSL PL	MORPL, MOCPL		152	23000 Lumen LED (Type E-FL)	\$ 26.63	\$ 26.63		0.000%	L23EF
194	MSL PL	MORPL, MOCPL		152	45000 Lumen LED (Type F-FL)	\$ 56.86	\$ 56.86		0.000%	L45FF
195	MSL PL									
196	MSL PL	Additional Charges								
197	MSL PL	MORPL, MOCPL		152	Each 30-foot metal pole installed	\$ 5.01	\$ 5.01		0.000%	SP30
198	MSL PL	MORPL, MOCPL		152	Each 35-foot metal pole installed	\$ 5.47	\$ 5.47		0.000%	SP35
199	MSL PL	MORPL, MOCPL		152	Each 30-foot wood pole installed	\$ 6.71	\$ 6.71		0.000%	WP30
200	MSL PL	MORPL, MOCPL		152	Each 35-foot wood pole installed	\$ 6.90	\$ 6.90		0.000%	WP35
201	MSL PL	MORPL, MOCPL		152	Each overhead span of circuit installed	\$ 3.99	\$ 3.99		0.000%	SPAN
202	MSL PL	MORPL, MOCPL		152	Breakaway Base	\$ 3.35	\$ 3.35		0.000%	BKWWY
203	MSL PL	MORPL, MOCPL		152	Underground Lighting Unit	\$ 3.57	\$ 3.57		0.000%	U300
204										
205										

	B	C	D	E	F	G	H	I
1	Evergny - Missouri West							
2	Thermal Energy Storage Pilot Program							
3								
4	Case No.				ER-2022-0130			
5	Status:				Direct			
6								
7	6.39%							
8	<i>INPUT FOR MODEL</i>							
	JURIS INCREASE (%)						7.99%	5.81%
9	Charge	Voltage	Rate Code	Season	Tariff Values	Current Rates	Rates with Increase	Proposed Rates
10	Customer Charge/ Other Meter	Secondary/Primary	MO650 /MO660	Summer/Winter	Customer Charge	194.44	209.97	209.97
11								
12	Demand Charge - Blk 1/ Base	Secondary/Primary	MO650	Summer	Summer	9.903	10.694	10.694
13	Demand Charge - Blk 1/ Base	Secondary/Primary	MO650	Winter	Winter	7.250	7.829	7.829
14								
15	Demand Charge - Blk 1/ Base	Primary	MO660	Summer	Summer	8.260	8.920	8.920
16	Demand Charge - Blk 1/ Base	Primary	MO660	Winter	Winter	5.306	5.730	5.730
17								
18	Energy Charge - Blk 1/ On-Peak	Secondary	MO650	Summer	Peak	0.07882	0.07882	0.08340
19	Energy Charge - Blk 3/ Shoulder /S	Secondary	MO650	Summer	Shoulder	0.04422	0.04422	0.04679
20	Energy Charge - Blk 2/ Off-Peak	Secondary	MO650	Summer	Off-Peak	0.03965	0.03965	0.04196
21								
22	Energy Charge - Blk 1/ On-Peak	Secondary	MO650	Winter	Peak	0.04422	0.04422	0.04679
23	Energy Charge - Blk 2/ Off-Peak	Secondary	MO650	Winter	Off-Peak	0.03964	0.03964	0.04195
24								
25	Energy Charge - Blk 1/ On-Peak	Primary	MO660	Summer	Peak	0.07882	0.07882	0.08340
26	Energy Charge - Blk 3/ Shoulder /S	Primary	MO660	Summer	Shoulder	0.04422	0.04422	0.04679
27	Energy Charge - Blk 2/ Off-Peak	Primary	MO660	Summer	Off-Peak	0.03965	0.03965	0.04196
28								
29	Energy Charge - Blk 1/ On-Peak	Primary	MO660	Winter	Peak	0.04422	0.04422	0.04679
30	Energy Charge - Blk 2/ Off-Peak	Primary	MO660	Winter	Off-Peak	0.03964	0.03964	0.04195
31								
32								
33				MO650	Summer		2.018%	6.364%
34				MO650	Winter		2.144%	6.401%
35				MO660	Summer		0.000%	0.000%
36				MO660	Winter		0.000%	0.000%
37				Winter Price Below Summer (SUM-WIN)/SUM		15.46%	15.35%	15.43%
38				Thermal Energy Storage Overall Change			2.080%	6.382%
39								
40					Revenue	\$ 460,184.06	\$ 469,753.59	\$489,552.78
41					Change in Revenue			\$ 29,368.72
42								
43					Proposed change per Revenue Summary			\$ 29,420.00

**Evergy - Missouri West
Clean Charge Network**

Case No. ER-2022-0130
Status Direct

		<i>INPUT FOR MODEL</i>	
JURIS INCREASE (%)		10.50%	0.00%

Charge	Rate Code	Season	Tariff Language	Current Rates	Rates with Increase	Proposed Rates	% Change
Energy Charge - Blk 1/ On-Peak	CCN	Summer	Energy Level 2 Charge	0.20000	0.22100	0.22100	10.50%
Energy Charge - Blk 2/ Off-Peak	CCN	Summer	Energy Level 3 Charge	0.25000	0.27625	0.27625	10.50%
Energy Charge - Blk 1/ On-Peak	CCN	Winter	Energy Level 2 Charge	0.20000	0.22100	0.22100	10.50%
Energy Charge - Blk 2/ Off-Peak	CCN	Winter	Energy Level 3 Charge	0.25000	0.27625	0.27625	10.50%

CCN Summer	100.000%	10.50%	10.500%
CCN Winter	100.000%	10.50%	10.500%
Winter Price Below Summer (SUM-WIN)/SUM	2.43%	2.43%	2.43%
CCN Overall Change		10.500%	10.500%

Revenue	\$	34,278.85	\$	37,878.13	\$	37,878.13
Change in Revenue						\$3,599
Proposed change per Revenue Summary					\$	3,611.00
						(\$12)
	\$	34,278.85				

Tie-out to Billed Revenue Total
977

% Because Riders and Surcharges are included in pricing above, straight Revenue calculations from these prices include those extra charges, and thus do not match Billed Revenue total

The SSR rates are calculated from the class rates. Therefore, the SSR must be included in filed cases that involve a change in applicable class rates.
 Explanation of calculation methodology - reference case ER-2018-0145/0146, B. J. Meyer surrebuttal testimony

MO West SSR Summary								
SGS Secondary Voltage	SGS Primary Voltage	LGS Secondary Voltage	LGS Primary Voltage	LPS Secondary Voltage	LPS Primary Voltage	LPS Substation Voltage	LPS Transmission Voltage	
Standby Fixed Charges								
\$110.00	\$110.00	\$130.00	\$130.00	\$430.00	\$430.00	\$430.00	\$430.00	Administrative Charge
Facilities Charge per month per kW of Contracted Standby Capacity								
\$0.162	\$0.157	\$0.120	\$0.116	\$1.433	\$1.391	\$1.361	\$1.351	Summer
\$0.158	\$0.153	\$0.081	\$0.078	\$0.746	\$0.724	\$0.709	\$0.704	Winter
\$0.162	\$0.157	\$0.120	\$0.116	\$1.433	\$1.391	\$1.361	\$1.351	Generation and Transmission Access Charge per month per kW of Contracted Standby Capacity
Daily Standby Demand Rate - Summer								
\$0.163	\$0.161	\$0.210	\$0.151	\$0.802	\$0.756	\$0.544	\$0.540	Back-Up
\$0.081	\$0.080	\$0.105	\$0.076	\$0.401	\$0.378	\$0.272	\$0.270	Maintenance
Daily Standby Demand Rate - Winter								
\$0.161	\$0.159	\$0.191	\$0.134	\$0.481	\$0.445	\$0.240	\$0.238	Back-Up
\$0.081	\$0.080	\$0.096	\$0.067	\$0.241	\$0.222	\$0.120	\$0.119	Maintenance
Back-Up Energy Charges - Summer								
\$0.09873	\$0.09263	\$0.09243	\$0.08963	\$0.05634	\$0.05461	\$0.05310	\$0.05415	kWh in excess of Supplemental Contract Capacity
Back-Up Energy Charges - Winter								
\$0.07172	\$0.07044	\$0.07042	\$0.06787	\$0.05259	\$0.05101	\$0.05018	\$0.04891	kWh in excess of Supplemental Contract Capacity

**SCHEDULE MEM-6
CONTAINS CONFIDENTIAL
INFORMATION
NOT AVAILABLE TO THE PUBLIC.

ORIGINALS FILED UNDER SEAL.**