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Annualized/Normalized Revenues;
Class Cost of Service; and Rate Design
Witness: Marisol E. Miller
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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2018-0145

DIRECT TESTIMONY

OF

MARISOL E. MILLER

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

**Kansas City, Missouri
January 2018**

KCP&L Exhibit No. 152
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DIRECT TESTIMONY

OF

MARISOL E. MILLER

Case No. ER-2018-0145

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 Kansas City Power & Light Company (“KCP&L” or “Company”) as
6 Supervisor – Regulatory Affairs.

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

8 A: I am testifying on behalf of KCP&L.

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

10 A: My general responsibilities are to provide support for the Company’s regulatory activities
11 in the Missouri and Kansas jurisdictions. Specifically, my duties include class cost of
12 service support, rate design, tariff management, filing preparation, and load research
13 support. I also manage certain analytical activities for the department including rate
14 change implementation, billing determinant calculation, and retail revenue calculation.

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

16 A: I hold a Masters of Business Administration degree from Rockhurst University with an
17 emphasis in Management. I also was awarded a Bachelor of Science in Business
18 Administration Magna Cum Laude with an emphasis in Business Finance and
19 Banking/Financial Markets from the University of Nebraska at Omaha. In addition to

1 those academic credentials, the Institute of Internal Auditor's ("IIA") and the Association
2 of Certified Fraud Examiners ("ACFE") have certified me as a Certified Internal Auditor
3 and Certified Fraud Examiner respectively.

4 I began my career at First Data Corporation working as Financial Analyst/Senior
5 Financial Analyst from October of 1999 until June of 2003. My primary responsibilities
6 included Financial Analysis, Forecasting, & Reporting. I then joined the Sprint
7 Corporation working there from 2003 until 2006, where my role evolved from work as a
8 Financial Analyst to Internal Audit work focused on Sarbanes Oxley Compliance.

9 I joined KCP&L in August of 2006 working as a Senior/Lead Internal Auditor. I
10 led various projects of increasing complexity and most notably was the on-site Internal
11 Auditor for the approximately \$2 billion Comprehensive Energy Plan Iatan 2
12 Construction project.

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

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

21 **A:** Yes, I provided written testimony before the Kansas Corporation Commission ("KCC")
22 and testified in a proceeding before the Missouri Public Service Commission in Docket
23 No. ER-2016-0285 supporting the Company's request for a rate increase.

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

2 **A:** The purpose of my testimony is to:

3 I. Explain how the Company satisfied the MPSC's minimum filing requirements
4 ("MFR") under 4 CSR 240-3.030 for this rate case filing;

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

6 III. Provide an update on MPSC-ordered Rate Design Studies;

7 IV. Explain the Electric Class Cost of Service ("CCOS") Study; and

8 V. Explain and support the Company's Electric Rate Design.

9 **I. MINIMUM FILING REQUIREMENTS**

10 **Q: What is the purpose of this part of your testimony?**

11 **A:** The purpose of this part of my testimony is to confirm that KCP&L has satisfied the
12 MPSC's MFR, as set forth in 4 CSR 240-3.030.

13 **Q: How did KCP&L satisfy the MFR?**

14 **A:** The following information was prepared and attached to the Company's Application filed
15 concurrently with this testimony, to address the specific requirements of the MFR as
16 outlined in 4 CSR 240-3.030(3):

17 A. Letter of transmittal;

18 B. General information, including:

19 1. The dollar amount of the aggregate annual increase and percentage over
20 current revenues;

21 2. Names of counties and communities affected;

22 3. The number of customers to be affected;

- 1 4. The average change requested in dollars and percentage change from
2 current rates;
- 3 5. The proposed annual aggregate change by general categories of service
4 and by rate classification;
- 5 6. Press releases relative to the filing; and
- 6 7. A summary of reasons for the proposed changes.

7 **II. ANNUALIZED/NORMALIZED REVENUES**

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

10 **A: Yes, they were.**

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

12 **A: Both the weather-normalized kWh sales and customer growth levels by rate class (i.e.**
13 **Residential, Small General Service, Medium General Service and Large General Service)**
14 **were developed by Company witness Albert R. Bass, Jr.. Mr. Bass explains those figures**
15 **in his Direct Testimony. The test year used by the Company in this case was the 12**
16 **months ending June 30, 2017, which we expect will be updated for known and**
17 **measurable changes through June 30, 2018. The monthly bill frequencies for the 12**
18 **months ending June 30, 2017, that contain the billing units for each of the billing blocks**
19 **for the various rate components, were developed under my supervision. These bill**
20 **frequencies were developed by collecting the actual usage and customer counts billed in**
21 **each month of the test period and applying them to the existing rate structures. By**
22 **applying the existing rates to the usage in each of the billing blocks, the revenues were**
23 **reproduced, providing a basis for determining the overall revenues to be used in this case.**

1 The Company determined monthly revenues by applying the normalized sales and
2 customer levels for each month represented in the test period to the corresponding billing
3 frequency. The normalized sales and customer levels from this were then multiplied by
4 the rates that took effect on June 8, 2017 to obtain the weather normalized and customer
5 growth adjusted monthly revenues available. The sum of the monthly revenues was
6 compared to the actual revenues for the test year ending June 30, 2017 to determine the
7 revenue adjustment contained in the Summary of Adjustments attached to the Direct
8 Testimony of Company witness Ronald A. Klote as Schedule RAK-4 (adjustment no. R-
9 20).

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

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

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

19 A: The Demand-Side Investment Mechanism (“DSIM”) is separate from the revenue
20 requirement requested in this case and thus the associated DSIM revenues have been
21 removed from the total revenues available. The fuel adjustment clause (“FAC”) rider
22 base amount has been re-based within the current revenue requirement. In addition to my

1 testimony on the FAC, please see the Direct Testimony of Tim M. Rush for the primary
2 details concerning the continuation of the FAC in this case.

3 III. RATE DESIGN STUDIES-UPDATE

4 **Q: Rate Design studies were ordered in GMO's last rate case. Can you explain what**
5 **was ordered and the status of the studies?**

6 **A:** In GMO's last rate case ("ER-2016-0156"), a Stipulation & Agreement ("S&A") was
7 filed on September 20, 2016 outlining several studies to be completed by KCP&L
8 Greater Missouri Operations Company's ("GMO") next rate case or rate design case.
9 The specific S&A language included the following:

10 *"Agree to study 1) modifying GMO's seasonal rates in a future rate proceeding to*
11 *establish rates for Peak months and Shoulder months, as opposed to GMO's*
12 *current Summer/Non-Summer seasonal split, including applicable determinants;*
13 *and 2) responsible energy use as related to residential block rates. The Company*
14 *will work with the Signatories to define the scope of study. GMO will file the*
15 *results of this study as part of its direct testimony in GMO's next general rate*
16 *case or rate design case, whichever occurs first."*

17 *"GMO will include in its direct filing in its next rate case or rate design case a*
18 *study of TOU rates for GMO including TOU residential and SGS rates, critical*
19 *peak rates, Electric Vehicle TOU rates for stand-alone charging stations, TOU*
20 *rates applicable to Electric Vehicle charging associated with an existing account,*
21 *Real Time Pricing, Peak Time Rebates, and other rate types which could*
22 *encourage load shifting/efficiency. GMO will propose rates based on this study no*
23 *later than its next rate case or rate design case."*

1 Q: If the order was a GMO specific order, why is it being discussed in the KCP&L
2 case?

3 A: While the GMO studies resulted from a GMO rate case order, the results from the studies
4 were used to inform rate design offerings in the KCP&L jurisdiction.

5 Q: Are these studies filed in this rate case filing?

6 A: The GMO studies are filed in the concurrent GMO rate case (“ER-2018-0146”).

7 Q: What were the overall results of the studies?

8 A: Residential Seasonal Study - The purpose of this study was to consider alternate
9 methods for representing the seasons within the residential rates, specifically a peak and
10 shoulder month seasonal rate structure, as opposed to the current summer/winter seasons,
11 if the change would better reflect the current drivers of system capacity needs, the market
12 energy price variation, and any other relevant drivers.

13 Based on the overall analysis, this study does not support modifying the current
14 seasons used by GMO. The cost analysis documents higher average costs in the summer
15 months supporting the current two season rate structure, and the review of regional utility
16 rates indicates that the GMO summer/winter seasons is consistent with the seasonal
17 structure used by other utilities. Furthermore, introducing additional seasons would lead
18 to greater complexity and create potentially confusing price signals for customers due to
19 the cyclical nature of the billing process.

20 Residential Block Study - The purpose of this study was to evaluate the role of
21 residential energy blocks in promoting responsible energy use. This analysis was not
22 intended to determine which rate structures should be offered, but rather to identify

1 appropriate rate block thresholds to promote responsible energy use for a variety of rate
2 structures that will be considered in future Company rate design analysis.

3 Review of electric block rate structures in the region show that many of the
4 neighboring, summer peaking utilities, like GMO, continue to use a block rate design
5 during the winter season to achieve price segmentation reflective of the benefits of
6 improved load factor and the reduced costs of off season uses.

7 Policy goals are shifting from the simple energy conservation focus of yesteryear
8 toward achieving greenhouse gas (“GHG”) reductions. Many are recognizing the need
9 to assess the GHG emissions associated with various ways to power end-uses, as
10 opposed to simply managing the number of kilowatt-hours consumed. To that end,
11 “emissions efficiency” may be as or more important than “energy efficiency” moving
12 forward and ultimately may be the best measure of responsible energy use. Some rate
13 designs that can deviate from a cost basis, like the inclining block rate (“IBR”), create an
14 economic disincentive to pursue beneficial electrification.

15 Two types of alternative residential rate designs are often proposed to meet
16 rapidly evolving customer needs in the near-term; time based rates and demand based
17 rates. Based on literature review and considerations discussed in the study, Time of
18 Use (“TOU”) and Demand rate options are the best rate designs for the Company to
19 pursue to meet the objectives of responsible energy use, demand-side management, and
20 beneficial electrification.

21 TOU Study - GMO retained the consulting services of Burns & McDonnell
22 (“BMcD”) to conduct a TOU Rate Study and to prepare a report which addresses the
23 MPSC’s order in the 2016 GMO rate case.

1 The TOU Rate Study (“Study”) consisted of collecting information and
2 conducting qualitative and quantitative analyses of the existing GMO Residential and
3 Small General Service rates and analyzing new Residential and Small General Service
4 TOU rate designs.

5 The development and design of rates for the Residential and Small General
6 Service classes was based upon consideration of Company goals, application of good
7 rate making principles, consideration of the qualitative ratings, comparison to common
8 practice, and the experience of BMcD in this area. Further, the designs were evaluated
9 using load research and CCOS analysis, designed to be revenue neutral to the existing
10 rates in each class, reflect the utility’s CCOS by season and time-period, and to meet
11 GMO and KCP&L’s rate design objectives described in the report.

12 The Study recommendations include offering three new Residential rate options:
13 (1) a Demand Rate, (2) a TOU Energy rate, and (3) a combination TOU Energy and
14 Demand Rate. Results of the pilot should be used to make informed decisions about
15 the rate design and the required system configurations before rolling out other rate
16 modifications to a larger number of Residential and Small General Service customers.

17 The Study also includes the recommendation that MEEIA be used as the
18 foundation for the optional rates and that they be MEEIA programs in the next MEEIA
19 Filing. The recent DSM potential study analyzed these rate options as demand side
20 measures to address requirements outlined in the Missouri Chapter 22 Electric Utility
21 Resource Planning (IRP). These rates are proposed, in part, to attempt to achieve the
22 potential demand side benefit identified in the IRP process. However, the IRP process
23 largely ignores the ratemaking process, particularly, the treatment of revenue recovery,

1 as it assumes perfect rate making. Since that is not a reasonable outcome and since
2 these rate design options align with the goals of MEEIA, it would be appropriate to
3 explore possible inclusion as a MEEIA program that recognizes the need for the
4 Company to be kept whole when promoting energy efficiency, demand response
5 programs, and demand-side rates that are expected to impact the company's revenue
6 requirement and ability to recover fixed costs.

7 **Q: How were the study results used in this case?**

8 A: The Company is including a proposal to offer to Residential Customers a Demand Rate
9 Pilot, a TOU Energy Pilot, and a pilot for a combination TOU Energy Rate and a
10 Demand Rate in this rate case filing.

11 **Q: Did you propose every single Burns & McDonnell recommendation in this case?**

12 A: No. There were many recommendations that were made over an extended timeline
13 contingent upon many external factors and assumptions. Those factors include
14 technology limitations (e.g. 100% Advanced Metering Infrastructure ("AMI") roll-out),
15 rate case outcomes, and pilot results over time, etc. The most significant
16 recommendation that was not included in this filing is a pilot offering for the Small
17 General Service class. Given the expected demand response and limited impact to the
18 SGS Summer Load, it was decided that the focus would be on the Residential pilot
19 offerings at this time.

20 **Q: Why are the TOU proposals only being filed as pilots?**

21 A: The Company plans to ensure pilot success by tracking and analyzing pilot program
22 results/progress. This data will be used to assess future rate design modifications, as well
23 as, learn more about customer needs and wants, given available technology and

1 information, and to help improve customer education. It will take some time to analyze,
2 as well as, modify the pilot into a broader implementation that will be beneficial to most
3 customers in the Residential class. In the meantime, these pilot programs should be
4 beneficial and effective, following sound rate design principles that include supporting
5 efficient use of energy, utilization of cost of service based rate designs, providing revenue
6 sufficiency and stability and providing customer value and satisfaction, while minimizing
7 negative customer impact, including rate shock.

8 **Q: Did the Company include the exact rates from the TOU study in the proposed pilot**
9 **tariffs?**

10 A: No, while the TOU study utilized the latest available CCOS studies and load research, it
11 was not current data when the Company developed its pilot rates. The Company used the
12 latest available load research and CCOS information in this case for purposes of
13 proposing the pilot rates. Those rates should be refined as better information is made
14 available.

15 **Q: Could the offering of TOU Pilots result in a negative impact to the Company's**
16 **financials?**

17 A: Yes. Please see Company Witness Tim Rush testimony for information on the potential
18 financial impact to the Company and why the effective date of the tariffs needs to be
19 delayed.

20 IV. ELECTRIC CLASS COST OF SERVICE STUDY

21 **Q: Please give an overview of the Company's testimony supporting the electric Class**
22 **Cost of Service study.**

23 A: The CCOS study is supported by the following Company witnesses:

- 1 • Brad Lutz’s direct testimony includes a summary of past CCOS studies and
2 production allocation methodologies used and provides an explanation of the
3 process resulting in a recommended change in the production allocation method.
- 4 • Tom Sullivan’s direct testimony provides a discussion and support for utilization
5 of the Average & Excess production allocation method.
- 6 • This testimony includes discussion of the preparation of the CCOS study filed in
7 this proceeding.

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

9 A: Yes, the Company performed a CCOS study representative of the KCP&L jurisdiction.
10 A summary of the results of the Company’s CCOS studies are attached and marked as
11 Schedule MEM-1.

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

13 A: Yes, it was. Consistent with prior filings, the Company retained the services of
14 Management Applications Consulting who performed the primary CCOS modeling using
15 their proprietary software and data provided by the Company.

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

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

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

19 A: The purpose of the CCOS study is to directly assign or allocate each relevant component
20 of cost on an appropriate basis in order to determine the contribution that each customer
21 class and rate makes toward the Company’s overall rate of return. The CCOS analysis
22 strives to attribute costs in relationship to the cost-causing factors of demand, energy and
23 customers.

1 **Q: Would the CCOS study serve as the basis for the determination of increasing or**
2 **decreasing overall revenue levels for KCP&L?**

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

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

8 A: The primary classes the Company used in its analysis are Residential, Small General
9 Service, Medium General Service, Large General Service, Large Power Service, and
10 Lighting.

11 **Q: Do these classes and rates conform to the proposed electric rate tariffs?**

12 A: Generally, they do. The Residential class has several rate classifications available to it
13 that include general use, one-meter general use and heat, and a two-meter rate with
14 general use on one meter and a separate meter for space heating. The Small General
15 Service, Medium General Service and Large General Service classes also have general
16 usage rates and all electric rates, plus they can be specific to the voltage level at which
17 the customer receives service. The Large Power Service class is distinguished by the
18 specific voltage at which the customer receives service. In total, the Company has five
19 classes of service (plus Lighting), but has approximately 56 rates to meet the specific
20 needs of the customer and reporting and billing requirements.

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

22 A: The study is based on a historical test year of the 12 months ending June 30, 2017, with
23 known and measurable changes projected through June 30, 2018.

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

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

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

8 A: In order to make the appropriate assignment of costs to the appropriate class of customer,
9 it is necessary to first group the costs according to their function. The functions used in
10 the CCOS study were production, transmission, distribution, and other costs. The next
11 step was to classify the costs. Costs are classified as customer-related, energy-related, or
12 demand-related.

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

14 A: Customer-related costs are those costs necessary to provide electric service to the
15 customer independent of any usage by the customer. Some examples of these costs
16 include meter reading, customer accounting, billing and some investment in plant
17 equipment such as the meter and service line, facilities that are all necessary to make
18 service available. Portions of the distribution facility are separated between the customer
19 costs and the demand costs.

20 Energy-related costs are directly related to the generation and consumption of
21 energy and consist of such things as fuel and purchased power and certain transmission
22 costs.

1 Demand-related costs relate to the investment and expenses associated with the
2 Company's facilities necessary to supply the customer's full load requirements
3 throughout the year. The majority of demand-related costs consist of generation,
4 transmission plant and the non-customer portion of distribution plant.

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

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

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

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

18 Energy-related allocation factors were derived on the basis of each customer
19 classes' respective energy (kilowatt hour) requirements. Kilowatt-hour ("kWh") sales to
20 each customer class were available from Company records. The sales data was adjusted
21 to reflect normal weather, system losses and unaccounted for, in order to assign the
22 Company's total system output.

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

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

5 **Q: Was KCP&L's load research data used to develop any other allocators?**

6 A: Yes, it was used to develop distribution plant allocators based on customer's non-
7 coincident loads within each class.

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

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

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

12 A: After considering all allocation theories and ensuring that the selected method aligned
13 with the principles of reflecting actual planning and operating characteristics, cost
14 causation, recognizing the broad set of customer class characteristics and their usage, and
15 producing stable results on a year to year basis, the Company selected the utilization of
16 the Energy Weighted approach, specifically the Average & Excess Production Plant
17 Allocation method, incorporating a four (4) Coincident Peak ("CP") component. An
18 Energy Weighted approach was viewed to be cost effective, balanced through its
19 incorporation of energy, and less subjective than other methods. Utilization of the
20 Average & Excess method is an energy-weighted method of production plant allocation
21 that gives classes a reasonable balance between the energy and capacity function of
22 generating facilities. Please see direct Testimonies of Company witnesses' Brad Lutz

1 and Tom Sullivan for more information on other factors that contributed to the decision
2 to move to the Average & Excess method and the reasonableness of that decision.

3 **Q: Has this allocation method been proposed before?**

4 A: Yes. Company witness Tom Sullivan identifies in his direct testimony other companies
5 in the region that have proposed this method. In addition, other parties have proposed
6 variations of this method in testimony through many KCP&L rate case dockets.

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

9 A: Fuel costs were allocated using a monthly kWh allocator. Based on monthly fuel costs
10 from the Company for the 12 months ended June 30, 2017, each month's fuel costs were
11 allocated to each customer class's corresponding calendar month kWh sales adjusted for
12 losses. These allocated results were summed by rate and major customer class to identify
13 a proxy fuel allocator which was then used to allocate the actual fuel costs shown in the
14 CCOS study.

15 **Q: How were the off system sales margins that KCP&L receives from its external sales
16 of energy allocated?**

17 A: They were allocated using the Energy allocator.

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

19 A: Transmission plant costs were allocated using Average & Excess - 4 four coincident
20 peaks ("4CP").

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

22 A: Distribution Plant was primarily allocated using a Non-Coincident Peak ("NCP") demand
23 allocator based on the use of NCP class demands for Primary Plant in Accounts 360

1 through 367, with the exception of Account 363, which used a 12-CP demand allocation.
2 Also, Accounts 364, 365, 366 and 367 included methods to recognize primary and
3 secondary voltage cost separation.

4 **Q: What method did you use to allocate Line Transformers and secondary plant?**

5 A: Line Transformers and secondary plant costs were allocated to customers receiving
6 secondary service based on the weighted average of the diversified class demands (NCP)
7 and undiversified individual customer maximum demands.

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

9 A: Since we consider services customer-related, these costs were allocated based on the
10 customers total diversified maximum customer demands.

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

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

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

15 A: Yes, multiple rate base elements have been included. The following details their
16 allocation:

- 17 • Additions to net plant included cash working capital, materials and supplies,
18 prepayments, fuel inventory, and various regulatory assets.
- 19 • The cash working capital component of rate base was developed and allocated on
20 related expenses or plant in the CCOS study.
- 21 • Materials and supplies were allocated on total plant and demand allocation
22 factors.

- 1 • Prepayment items were allocated using total plant, customers, and demand
- 2 allocation factors.
- 3 • Fuel inventory was allocated on energy.
- 4 • The regulatory assets were allocated on labor, energy, or demand allocation
- 5 factors depending on the costs tracked.
- 6 • The accumulated deferred taxes were allocated on total plant.
- 7 • Customer advances for construction were allocated on total distribution plant.
- 8 • Customer deposits were developed using the data analysis by customer group
- 9 available from the Company.

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

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

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

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

- 22 • Account 930.1, General Advertising, which was allocated based on the number of
- 23 customers

- 1 • Account 928, Regulatory Commission expenses, which was primarily allocated to
- 2 classes on revenues at the uniform claimed rate of return
- 3 • Account 935 Maintenance of General Plant, which was allocated on general plant.

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

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

13 **Q: What were the results of the CCOS study?**

14 A: The overall jurisdictional rate of return was calculated to be 7.0%. Individual classes’
 15 rates of return at current rates vary, and based on the current costs, are shown in the
 16 following table.

Residential	Small General Service	Medium General Service	Large General Service	Large Power Service	Other Lighting
3.4%	11.9%	9.0%	10.5%	10.0%	12.7%

1 **Q: If rates were changed so that KCP&L earned the same rate of return from each**
2 **customer class, how much would each class's rates need to change?**

3 A: To achieve an overall the jurisdictional revenue increase of 1.9%, the classes should be
4 adjusted by the percentages in the table below.

Residential	Small General Service	Medium General Service	Large General Service	Large Power Service	Other Lighting
19.7%	-14.8%	-5.9%	-10.7%	-8.5%	-14.8%

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

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

12 **Q: In addition to the class results, was the study used to provide any additional**
13 **information?**

14 A: Yes, another element of the study was to explore costs at the rate level. This data
15 provides additional information to aid the Company in preparing its rate design.
16 Schedule MEM-2 is attached and contains this rate level information.

17 **Q: Is seasonality still reflected in the study?**

18 A: No. Seasonality has been removed from the study because it more closely relates to rate
19 design and is discussed in the rate design section of this testimony.

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

21 A: Yes.

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

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

- 9 • Apply no increase to the Lighting class (unmetered),
- 10 • Apply a 3.34% increase to the Residential class, and
- 11 • Apply a 0.97% increase equally to the remaining classes

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

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

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

19 **V. ELECTRIC RATE DESIGN**

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

21 A: Yes, I am.

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

3 A: The Company is requesting an annual aggregate increase over current revenues reflecting
4 impacts before the rebasing of fuel for the fuel adjustment clause, in the amount of \$8.9
5 million (1.02%). The aggregate annual increase over current revenues including the
6 rebasing of fuel for the fuel adjustment clause is \$16.4 million (1.88%).

7 Utilizing the results of the CCOS, the Company is proposing that an overall
8 increase of 3.34% be applied to Residential class revenues with a customer charge of
9 \$15.17. The \$15.17 proposed customer charge is based on the results of the CCOS, after
10 adjustment/removal of solar rebates and is consistent with prior Commission approved
11 customer charges. The remaining revenue shortfall/increase was then applied equally to
12 remaining Residential bill components. A 0.97% increase would be applied to all other
13 classes on an equal percentage basis, with the exception of the Lighting class, which
14 would get 0% increase. The Large General Service and Large Power classes would have
15 75% of the increase applied to the second energy block with the remainder of the increase
16 applied equally to the remaining components. The application of the above increases by
17 class by billing component can be found in attached schedule MEM-3. The summary of
18 revenues and proposed increase by class may be found in Schedules MEM-5 and MEM-
19 5A.

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

21 A: Yes, the Company is proposing a tariff for electric vehicle charging stations resulting
22 from KCP&L's Clean Charge Network program. Company Witness Tim M. Rush
23 explains this in detail in his Direct Testimony. Additionally, a new Renewable Energy

1 Rider is being proposed and a Solar Subscription Pilot Rider, as well as changes to our
2 existing Standby tariff. Company Witness Brad Lutz explains this in detail in his Direct
3 Testimony.

4 **Q: Please summarize the proposed changes to rules & regulation tariffs or other non-**
5 **base rate tariffs.**

6 **A:** The specific, proposed changes to rules and regulations and non-base rate tariffs may be
7 found in Schedule MEM-4. Changes are proposed to better align the rules & regulations
8 with current costs, planned business practices, and are generally minimal in impact. The
9 most significant changes included elimination to of the frozen Real-Time Pricing
10 (“RTP”) tariffs and modifications of the Special Contracts tariffs. The special contract
11 tariffs were streamlined to better align with business practices and the frozen RTP tariffs
12 are being proposed to be eliminated given the administratively burdensome nature to
13 maintain these frozen tariffs.

14 **Q: Does the Company propose any changes to the KCP&L Lighting class?**

15 **A:** No. As mentioned previously, the CCOS studies indicated the unmetered Lighting class
16 did not need to be increased. The Company is proposing to deploy Light Emitting Diode
17 (“LED”) lighting as part of its Private Lighting tariff. For details on the Company’s
18 Private Area Lighting initiative, see the Direct testimony of Company witness, Brad Lutz.

19 **Q: Are you proposing any additional tariff changes?**

20 **A:** Yes, there have also been changes to the FAC tariffs that are explained in detail in the
21 Direct Testimony of Company witness Tim. M. Rush.

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

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

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

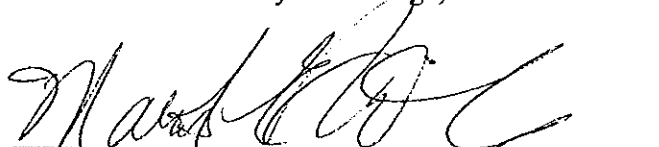
In the Matter of Kansas City Power & Light)
Company's Request for Authority to Implement)
A General Rate Increase for Electric Service) Case No. ER-2018-0145

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 Kansas City Power & Light Company as Supervisor – Regulatory Affairs.
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Kansas City Power & Light Company consisting of twenty-four (24) 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.



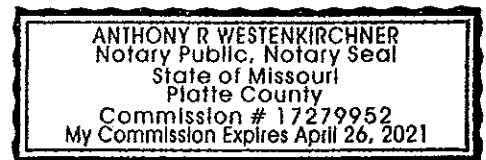
Marisol E. Miller

Subscribed and sworn before me this 29th day of January 2018.



Notary Public

My commission expires: 4/26/2021



Kansas City Power & Light Company
2018 RATE CASE - DIRECT
TY 6/30/17; Update TBD; K&M 6/30/18
COST OF SERVICE - Missouri Jurisdiction

Allocation Method: Prod - Avg & Excess 4 CP, Tran - Avg & Excess 4 CP

SCH LINE NO.	NO.	DESCRIPTION	ALLOCATION BASIS	MISSOURI RETAIL	RESIDENTIAL	SMALL GEN. SERVICE	MEDIUM GEN. SERVICE	LARGE GEN. SERVICE	LARGE PWR SERVICE	TOTAL LIGHTING	
		(a)	(b)	(c)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
1	0010	SCHEDULE 1 - SUMMARY OF OPERATING INC & RATE BASE									
1	0020		Reference								
1	0030	OPERATING REVENUE									
1	0040	RETAIL SALES REVENUE	TSFR 9 90	870,989,124	338,121,886	58,411,963	132,367,581	190,095,339	141,652,131	10,340,224	
1	0050	OTHER OPERATING REVENUE	TSFR 9 360	303,325,239	96,404,901	15,441,996	44,453,630	74,691,529	69,249,304	3,083,880	
1	0060	TOTAL OPERATING REVENUE		1,174,314,363	434,526,788	73,853,958	176,821,211	264,786,867	210,901,434	13,424,104	
1	0070										
1	0080	OPERATING EXPENSES									
1	0090	FUEL	TSFR 9 4090	165,926,224	53,379,845	8,427,153	24,263,314	40,466,894	37,752,327	1,636,690	
1	0100	PURCHASED POWER	TSFR 9 4100	275,438,518	86,595,215	13,984,639	40,381,734	68,203,206	63,480,981	2,792,743	
1	0110	OTHER OPERATION & MAINTENANCE EXPENSES	TSFR 9 4110	299,498,569	151,126,121	17,726,941	38,122,858	51,030,623	38,817,951	2,674,075	
1	0120	DEPRECIATION EXPENSES (AFTER CLEARINGS)	TSFR 5 1420	124,617,389	58,845,381	7,039,001	18,339,078	22,857,562	15,750,500	1,785,868	
1	0130	AMORTIZATION EXPENSES	TSFR 9 4590	25,525,373	11,735,311	1,415,867	3,769,815	4,919,125	3,449,120	236,135	
1	0140	TAXES OTHER THAN INCOME TAXES	TSFR 9 4710	64,993,344	30,469,547	3,659,239	9,383,915	12,240,444	8,636,539	603,660	
1	0150	CURRENT INCOME TAXES	TSFR 11 620	32,259,407	433,393	4,223,778	7,468,230	11,808,403	7,424,730	900,872	
1	0160	DEFERRED INCOME TAXES	TSFR 11 690	2,449,517	1,171,561	139,528	356,526	449,810	306,508	25,584	
1	0170	TOTAL ELECTRIC OPERATING EXPENSES		990,708,340	393,756,374	56,616,147	142,085,470	211,976,066	175,618,657	10,655,627	
1	0180										
1	0190	NET ELECTRIC OPERATING INCOME		183,606,023	40,770,414	17,237,812	34,735,741	52,810,801	35,282,777	2,768,477	
1	0200										
1	0210	RATE BASE									
1	0220	TOTAL ELECTRIC PLANT	TSFR 3 190	5,564,493,533	2,598,855,070	312,391,787	810,336,219	1,053,547,398	737,945,909	51,417,151	
1	0230	LESS: ACCUM. PROV. FOR DEPREC	TSFR 6 1700	2,245,853,467	1,051,302,484	126,564,795	322,839,125	423,128,344	299,040,798	22,977,921	
1	0240	NET PLANT		3,318,640,066	1,547,552,585	185,826,992	487,497,094	630,419,053	438,905,111	28,439,230	
1	0250	PLUS:									
1	0260	CASH WORKING CAPITAL	TSFR 2 30	(58,635,031)	(26,382,537)	(3,519,964)	(8,644,775)	(11,461,442)	(8,038,208)	(588,105)	
1	0270	MATERIALS & SUPPLIES	TSFR 2 100	64,704,386	28,893,393	3,525,254	9,582,207	12,899,784	9,288,758	514,990	
1	0280	PREPAYMENTS	TSFR 2 170	7,053,628	3,099,469	381,218	1,034,481	1,433,819	1,058,373	46,269	
1	0290	FUEL INVENTORY	TSFR 2 240	67,502,104	21,528,343	3,424,765	9,866,004	16,523,204	15,486,117	673,671	
1	0300	REGULATORY ASSETS	TSFR 2 330	55,949,144	22,729,460	2,991,270	8,438,596	12,247,177	9,138,459	404,182	
1	0310	LESS:									
1	0320	CUSTOMER ADVANCES FOR CONSTRUCTION	TSFR 2 380	1,668,576	948,764	106,123	240,886	230,100	109,499	33,204	
1	0330	CUSTOMER DEPOSITS	TSFR 2 390	4,337,669	2,306,087	1,638,070	335,782	54,077	3,654	0	
1	0340	DEFERRED INCOME TAXES	TSFR 2 400	789,779,808	368,860,750	44,338,397	115,012,657	149,532,110	104,738,154	7,297,740	
1	0350	DEFERRED GAIN ON SO2 EMISSIONS ALLOWANCE	TSFR 2 410	31,794,080	9,995,752	1,614,258	4,661,295	7,872,748	7,327,658	322,368	
1	0360	DEFERRED GAIN(LOSS) EMISSIONS ALLOWANCE	TSFR 2 420	0	0	0	0	0	0	0	
1	0370	INCOME ELIGIBLE WEATHERIZATION	TSFR 2 430	861,057	861,057	0	0	0	0	0	
1	0380	TOTAL RATE BASE		2,626,773,107	1,214,448,303	144,932,687	387,522,988	504,372,559	353,659,645	21,836,925	
1	0390										
1	0400	RATE OF RETURN		6.990%	3.357%	11.894%	8.964%	10.471%	9.976%	12.678%	
1	0410	RELATIVE RATE OF RETURN		1.00	0.48	1.70	1.28	1.50	1.43	1.81	
1	0420										
1	0430										
1	0440										
1	0450										
1	0460										
1	0470										
1	0480										
1	0490										

Kansas City Power & Light Company
2018 RATE CASE - DIRECT
TY 6/30/17; Update TBD; K&M 6/30/18
COST OF SERVICE - Missouri Jurisdiction

Allocation Method: Prod - Avg & Excess 4 CP, Tran - Avg & Excess 4 CP

SCH LINE NO. NO.	DESCRIPTION	ALLOCATION BASIS	MISSOURI RETAIL	RESIDENTIAL	SMALL GEN. SERVICE	MEDIUM GEN. SERVICE	LARGE GEN. SERVICE	LARGE PWR SERVICE	TOTAL LIGHTING	
	(a)	(b)	(c)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
1 0500										

Kansas City Power & Light Company
 2018 RATE CASE - DIRECT
 TY 6/30/17; Update TBD; K&M 6/30/18
 COST OF SERVICE - Missouri Jurisdiction

Table 4
 Cost of Service Results – Unbundled Customer, Demand and Energy Cost Components

Line No.	Customer Class (a)	Uniform Rate of Return @ 7.45%		
		Monthly (\$) Customer Charge (b)	Energy Costs (\$/kWh) Annual (c)	Demand Costs (\$/kWh) Annual (d)
1	RESIDENTIAL	\$17.43	0.0226	0.1131
2	Regular	\$17.00	0.0229	0.1211
3	Time of Day	\$18.58	0.0226	0.1085
4	All Electric	\$17.96	0.0220	0.0933
5	Separately Metered	\$22.93	0.0215	0.0896
6				
7	SMALL GS	\$18.12	0.0220	0.0829
8	Primary & Secondary	\$18.42	0.0220	0.0833
9	Other (Unmetered)	\$10.08	0.0218	0.0760
10	All Electric	\$20.79	0.0217	0.0777
11	Separately Metered	\$27.35	0.0214	0.0792
12				
13	MEDIUM GS	\$37.53	0.0219	0.0790
14	Primary	\$17.74	0.0222	0.0659
15	Secondary	\$36.36	0.0220	0.0801
16	All Electric	\$54.63	0.0215	0.0725
17	Separately Metered	\$50.68	0.0216	0.0806
18				
19	LARGE GS	\$35.62	0.0216	0.0609
20	Primary	\$35.07	0.0214	0.0588
21	Secondary	\$35.00	0.0218	0.0635
22	All Electric	\$34.88	0.0214	0.0573
23	Separately Metered	\$60.26	0.0216	0.0612
24				
25	LARGE POWER SERVICE	\$365.39	0.0214	0.0452
26	Primary	\$386.78	0.0214	0.0473
27	Secondary	\$323.03	0.0219	0.0510
28	Substation	\$385.80	0.0211	0.0383
29	Transmission	\$385.75	0.0206	0.0382
30				
31	TOTAL LIGHTING		0.0216	0.0385

Notes:

(1) Allocation Method: Prod - Avg & Excess 4 CP, Tran - Avg & Excess 4 CP

	A	B	C	D	E
1	Kansas City Power and Light - Missouri				
2	Large Power Service				
3					
4	Case No.	ER-2018-0145			
5	Status:	Direct			
6				0.97%	0.01%
7			Current Rates	Rates With Increase	Proposed Rates
8	JURISDICTIONAL INCREASE (%)			0.00%	0.98%
9					
10					
11	A: CUSTOMER CHARGE - Rate Code (All)		1,149.23	1,149.23	1,160.53
12					
13	B: FACILITIES CHARGE				
14	SECONDARY - Rate Code (1PGSE; 1PGSH):		3.849	3.849	3.887
15	PRIMARY - Rate Code (1PGSF; 1PGSG; 1POSF; 1POSG):		3.190	3.190	3.221
16	SUBSTATION - Rate Code (1PGSV; 1POSV):		0.963	0.963	0.972
17	TRANSMISSION - Rate Code (1PGSZ; 1POSW; 1POSZ):		-	-	-
18					
19	C: DEMAND CHARGE				
20	SECONDARY-SUMMER - Rate Code (1PGSE; 1PGSH):				
21	First 2443 KW		14.932	14.932	15.079
22	Next 2443 KW		11.944	11.944	12.061
23	Next 2443 KW		10.006	10.006	10.104
24	All KW over 7329 KW		7.304	7.304	7.376
25					
26	SECONDARY-WINTER - Rate Code (1PGSE; 1PGSH):				
27	First 2443 KW		10.150	10.150	10.250
28	Next 2443 KW		7.920	7.920	7.998
29	Next 2443 KW		6.987	6.987	7.056
30	All KW over 7329 KW		5.379	5.379	5.432
31					
32	PRIMARY-SUMMER - Rate Code (1PGSF; 1PGSG; 1POSF; 1POSG):				
33	First 2500 KW		14.589	14.589	14.732
34	Next 2500 KW		11.672	11.672	11.787
35	Next 2500 KW		9.776	9.776	9.872
36	All KW over 7500 KW		7.138	7.138	7.208
37					
38	PRIMARY-WINTER - Rate Code (1PGSF; 1PGSG; 1POSF; 1POSG):				
39	First 2500 KW		9.915	9.915	10.012
40	Next 2500 KW		7.740	7.740	7.816
41	Next 2500 KW		6.827	6.827	6.894
42	All KW over 7500 KW		5.257	5.257	5.309
43					
44	SUBSTATION-SUMMER - Rate Code (1PGSV; 1POSV):				
45	First 2530 KW		14.415	14.415	14.557
46	Next 2530 KW		11.532	11.532	11.645
47	Next 2530 KW		9.660	9.660	9.755
48	All KW over 7590 KW		7.054	7.054	7.123
49					
50	SUBSTATION-WINTER - Rate Code (1PGSV; 1POSV):				
51	First 2530 KW		9.800	9.800	9.896
52	Next 2530 KW		7.649	7.649	7.724
53	Next 2530 KW		6.748	6.748	6.814
54	All KW over 7590 KW		5.195	5.195	5.246
55					
56	TRANSMISSION-SUMMER - Rate Code (1PGSZ; 1POSW; 1POSZ):				
57	First 2553 KW		14.291	14.291	14.431
58	Next 2553 KW		11.429	11.429	11.541
59	Next 2553 KW		9.572	9.572	9.666
60	All KW over 7659 KW		6.990	6.990	7.069
61					
62	TRANSMISSION-WINTER - Rate Code (1PGSZ; 1POSW; 1POSZ):				
63	First 2553 KW		9.712	9.712	9.807
64	Next 2553 KW		7.580	7.580	7.655
65	Next 2553 KW		6.688	6.688	6.754
66	All KW over 7659 KW		5.148	5.148	5.199
67					
68	D: ENERGY CHARGE				
69	SECONDARY-SUMMER - Rate Code (1PGSE; 1PGSH):				
70	First 180 Hours Use per month		0.09350	0.09350	0.09442
71	Next 180 Hours Use per month		0.05557	0.05598	0.05612
72	Over 360 Hours Use per month		0.02667	0.02667	0.02693
73					
74	SECONDARY-WINTER - Rate Code (1PGSE; 1PGSH):				
75	First 180 Hours Use per month		0.07926	0.07926	0.08004
76	Next 180 Hours Use per month		0.05055	0.05092	0.05105
77	Over 360 Hours Use per month		0.02640	0.02640	0.02666
78					

	A	B	C	D	E
79		PRIMARY-SUMMER - Rate Code (1PGSF, 1PGSG, 1POSF, 1POSG):			
80		First 180 Hours Use per month	0.09136	0.09136	0.09226
81		Next 180 Hours Use per month	0.05432	0.05472	0.05485
82		Over 360 Hours Use per month	0.02604	0.02604	0.02630
83					
84		PRIMARY-WINTER - Rate Code (1PGSF, 1PGSG, 1POSF, 1POSG):			
85		First 180 Hours Use per month	0.07745	0.07745	0.07821
86		Next 180 Hours Use per month	0.04938	0.04974	0.04987
87		Over 360 Hours Use per month	0.02580	0.02580	0.02605
88					
89		SUBSTATION-SUMMER - Rate Code (1PGSV, 1POSV):			
90		First 180 Hours Use per month	0.09029	0.09029	0.09118
91		Next 180 Hours Use per month	0.05368	0.05407	0.05421
92		Over 360 Hours Use per month	0.02573	0.02573	0.02598
93					
94		SUBSTATION-WINTER - Rate Code (1PGSV, 1POSV):			
95		First 180 Hours Use per month	0.07656	0.07656	0.07731
96		Next 180 Hours Use per month	0.04880	0.04916	0.04928
97		Over 360 Hours Use per month	0.02549	0.02549	0.02574
98					
99		TRANSMISSION-SUMMER - Rate Code (1PGSZ, 1POSZ, 1POSZ):			
100		First 180 Hours Use per month	0.08949	0.08949	0.09037
101		Next 180 Hours Use per month	0.05319	0.05358	0.05371
102		Over 360 Hours Use per month	0.02551	0.02551	0.02576
103					
104		TRANSMISSION-WINTER - Rate Code (1PGSZ, 1POSZ, 1POSZ):			
105		First 180 Hours Use per month	0.07585	0.07585	0.07660
106		Next 180 Hours Use per month	0.04837	0.04872	0.04885
107		Over 360 Hours Use per month	0.02525	0.02525	0.02550
108					
109		E: REACTIVE DEMAND ADJUSTMENT - Rate Code (A9)	0.966	0.966	0.975
110		LGS Secondary	0.000%	0.150%	0.985%
111		LGS Primary	0.000%	0.156%	0.982%
112		LGS Substation Voltage	0.000%	0.173%	0.980%
113		LGS Transmission Voltage	0.000%	0.185%	0.986%
114		LGS Overall Change (*)	0.000%	0.159%	0.983%
115		Winter Price Below Summer (SUM-WIN)/SUM	14.076%	14.068%	14.076%
116		Overall Change		0.159%	0.983%
117					
118		Revenue ⁽¹⁾	\$144,354,374	\$144,584,321	\$145,773,073
119		Change in Revenue			\$1,415,438
120					
121		Proposed change per Revenue Summary			\$1,415,662
122					(\$224)
123		Manual Bill	(\$331,687)	(\$331,687)	(\$334,948)
124		Overall Revenue	\$144,022,687	\$144,252,634	\$145,438,125
125		EDR credits	(\$1,884,376)		
126			\$142,138,311		

	A	B	C	D	E
1	Kansas City Power and Light - Missouri				
2	Large General Service				
3					
4	Case No:	ER-2018-0145			
5	Status:	Direct			
6					
7			Current Rates	Rates w/ Rate Design	Proposed Rates
8	JURISDICTIONAL INCREASE (%)			0.000%	1.08%
9	A: CUSTOMER CHARGE				
10		0-24 KW - Rate Code (All):	118.82	118.82	120.11
11		25-199 KW - Rate Code (All):	118.82	118.82	120.11
12		200-999 KW - Rate Code (All):	118.82	118.82	120.11
13		1000 KW or above - Rate Code (All):	1,014.44	1,014.44	1,025.43
14		Separately Metered Space Heat - Rate Code (1LGHE, 1LGHH, 1LSHE):	2.72	2.72	2.75
15					
16	B: FACILITIES CHARGE				
17		SECONDARY - Rate Code (1LGSE, 1LGSH, 1LGA, 1LGAH, 1LGH, 1LGH, 1LSHE):	3.399	3.399	3.436
18		PRIMARY - Rate Code (1LGSF, 1LGS, 1LGA):	2.618	2.618	2.649
19					
20	C: DEMAND CHARGE				
21		SECONDARY-SUMMER - Rate Code (1LGSE, 1LGSH, 1LGA, 1LGAH, 1LGH, 1LGH, 1LSHE):	6.788	6.788	6.862
22		SECONDARY-WINTER - Rate Code (1LGSE, 1LGSH, 1LGA, 1LGAH, 1LGH, 1LGH, 1LSHE):	3.652	3.652	3.692
23		PRIMARY-SUMMER - Rate Code (1LGSF, 1LGS, 1LGA):	6.634	6.634	6.706
24		PRIMARY-WINTER - Rate Code (1LGSF, 1LGS, 1LGA):	3.569	3.569	3.608
25		SECONDARY-WINTER - ALL ELEC ONLY (Frozen) - Rate Code (1LGA, 1LGAH):	3.382	3.382	3.419
26		PRIMARY-WINTER - ALL ELEC ONLY (Frozen) - Rate Code (1LGA):	3.302	3.302	3.338
27					
28	D: ENERGY CHARGE				
29		SECONDARY-SUMMER - Rate Code (1LGSE, 1LGSH, 1LGA, 1LGAH, 1LGH, 1LGH, 1LSHE):			
30		First 180 Hours Use per month	0.09969	0.09969	0.10077
31		Next 180 Hours Use per month	0.06872	0.06922	0.06922
32		Over 360 Hours Use per month	0.04425	0.04425	0.04473
33					
34		SECONDARY-WINTER - Rate Code (1LGSE, 1LGSH, 1LGA, 1LGAH, 1LGH, 1LGH, 1LSHE):			
35		First 180 Hours Use per month	0.09160	0.09160	0.09259
36		Next 180 Hours Use per month	0.05262	0.05321	0.05321
37		Over 360 Hours Use per month	0.03719	0.03719	0.03759
38					
39		PRIMARY-SUMMER - Rate Code (1LGSF, 1LGS, 1LGA):			
40		First 180 Hours Use per month	0.09745	0.09745	0.09851
41		Next 180 Hours Use per month	0.06708	0.06757	0.06757
42		Over 360 Hours Use per month	0.04321	0.04321	0.04368
43					
44		PRIMARY-WINTER - Rate Code (1LGSF, 1LGS):			
45		First 180 Hours Use per month	0.08951	0.08951	0.09048
46		Next 180 Hours Use per month	0.05156	0.05194	0.05194
47		Over 360 Hours Use per month	0.03646	0.03646	0.03686
48					
49		SECONDARY-WINTER - ALL ELECTRIC (Frozen) - Rate Code (1LGA, 1LGAH):			
50		First 180 Hours Use per month	0.08808	0.08808	0.08903
51		Next 180 Hours Use per month	0.04726	0.04726	0.04726
52		Over 360 Hours Use per month	0.03689	0.03689	0.03729
53					
54		PRIMARY-WINTER - ALL ELECTRIC (Frozen) - Rate Code (1LGA):			
55		First 180 Hours Use per month	0.08623	0.08623	0.08716
56		Next 180 Hours Use per month	0.04622	0.04622	0.04622
57		Over 360 Hours Use per month	0.03618	0.03618	0.03657
58					
59	E: SEPARATELY METERED S/H-WINTER				
60		SECONDARY - Rate Code (1LGH, 1LGH, 1LSHE):	0.06162	0.06162	0.06229
61					
62	F: REACTIVE DEMAND ADJUSTMENT - Rate Code (All):				
63			0.853	0.853	0.862
64	G: TWO-PART TIME-OF-USE PRICING ADJUSTMENT				
65		SECONDARY - SUMMER ON-PEAK	0.12770	0.12770	0.12908
66		SECONDARY - SUMMER OFF-PEAK	0.05000	0.05000	0.05054
67		SECONDARY - WINTER ON-PEAK	0.04701	0.04701	0.04752
68		SECONDARY - WINTER OFF-PEAK	0.03791	0.03791	0.03832
69		PRIMARY - SUMMER ON-PEAK	0.11788	0.11788	0.11916
70		PRIMARY - SUMMER OFF-PEAK	0.04725	0.04725	0.04776
71		PRIMARY - WINTER ON-PEAK	0.04561	0.04561	0.04610
72		PRIMARY - WINTER OFF-PEAK	0.03678	0.03678	0.03718
73					
74	LGS Secondary		0.000%	0.159%	1.009%
76	LGS Overall Change (*)		0.000%	0.162%	1.008%
77	LGA Secondary		0.000%	0.069%	0.905%
78	LGA Primary		0.000%	0.069%	0.912%
79	LGA Winter Energy Overall Change		0.000%	0.000%	0.772%

	A	B	C	D	E
80	LGA Overall Change (%)		0.000%	0.069%	0.906%
81	Winter Price Below Summer (SUM-WIN)/SUM		16.183%	16.238%	16.214%
82	Overall Change			0.134%	0.979%
83					
84		Revenue ⁽¹⁾	\$191,037,407	\$191,294,006	\$192,907,444
85		Change in Revenue			\$1,870,076
86					
87		Proposed change per Revenue Summary			\$1,871,381
88					(\$1,305)
89					
90		Manual Bill	\$3,577	\$3,577	\$3,616
91		Overall Revenue	\$191,040,983	\$191,297,583	\$192,911,059
92		EDR credits	(\$1,027,396)		
93		Mpower credits	(\$11,360)		
94			\$190,002,227		

	A	B	C	D	E
1	Kansas City Power and Light - Missouri				
2	Medium General Service				
3					
4	Case No.	ER-2018-0145			
5	Status:	Direct			
6					
7			Current Rates	Rates With Increase	Proposed Rates
8	JURISDICTIONAL INCREASE (%)			0.975%	0.000%
9	A: CUSTOMER CHARGE				
10	0-24 KW - Rate Code (A8):		55.28	55.82	55.82
11	25-199 KW - Rate Code (A3):		55.28	55.82	55.82
12	200-999 KW - Rate Code (A1):		112.26	113.35	113.35
13	1000 KW or above - Rate Code (A1):		958.56	967.90	967.90
14	Separately Metered Space Heat - Rate Code (1MGHE; 1MGHH):		2.58	2.61	2.61
15					
16	B: FACILITIES CHARGE				
17	SECONDARY - Rate Code (1MGSE; 1MGSH; 1MSSE; 1MGAE; 1MGAH; 1MGHE; 1MGHH):		3.212	3.243	3.243
18	PRIMARY - Rate Code (1MGSF; 1MGSG; 1MGAF):		2.662	2.688	2.688
19					
20	C: DEMAND CHARGE				
21	SECONDARY-SUMMER - Rate Code (1MGSE; 1MGSH; 1MSSE; 1MGHE; 1MGHH; 1MGAE; 1MGAH):		4.202	4.243	4.243
22	SECONDARY-WINTER - Rate Code (1MGSE; 1MGSH; 1MSSE; 1MGHE; 1MGHH):		2.138	2.159	2.159
23	PRIMARY-SUMMER - Rate Code (1MGSF; 1MGSG):		4.104	4.144	4.144
24	PRIMARY-WINTER - Rate Code (1MGSF; 1MGSG):		2.087	2.107	2.107
25	SECONDARY-WINTER - ALL ELEC - Rate Code (1MGAE; 1MGAH):		3.027	3.056	3.056
26	PRIMARY-WINTER - ALL ELEC - Rate Code (1MGAF):		2.962	2.991	2.991
27					
28	D: ENERGY CHARGE				
29	SECONDARY-SUMMER - Rate Code (1MGSE; 1MGSH; 1MSSE; 1MGHE; 1MGHH; 1MGAE; 1MGAH):				
30	First 180 Hours Use per month		0.10982	0.11089	0.11090
31	Next 180 Hours Use per month		0.07513	0.07586	0.07586
32	Over 360 Hours Use per month		0.06336	0.06398	0.06398
33					
34	SECONDARY-WINTER - Rate Code (1MGSE; 1MGSH; 1MSSE; 1MGHE; 1MGHH):				
35	First 180 Hours Use per month		0.09491	0.09583	0.09584
36	Next 180 Hours Use per month		0.05680	0.05735	0.05735
37	Over 360 Hours Use per month		0.04764	0.04810	0.04810
38					
39	PRIMARY-SUMMER - Rate Code (1MGSF; 1MGSG; 1MGAF):				
40	First 180 Hours Use per month		0.10721	0.10825	0.10825
41	Next 180 Hours Use per month		0.07343	0.07415	0.07415
42	Over 360 Hours Use per month		0.06191	0.06251	0.06251
43					
44	PRIMARY-WINTER - Rate Code (1MGSF; 1MGSG):				
45	First 180 Hours Use per month		0.09268	0.09358	0.09358
46	Next 180 Hours Use per month		0.05549	0.05603	0.05603
47	Over 360 Hours Use per month		0.04673	0.04719	0.04719
48					
49	SECONDARY-WINTER - ALL ELECTRIC (Frozen) - Rate Code (1MGAE; 1MGAH):				
50	First 180 Hours Use per month		0.08327	0.08408	0.08408
51	Next 180 Hours Use per month		0.04764	0.04810	0.04810
52	Over 360 Hours Use per month		0.04137	0.04177	0.04177
53					
54	PRIMARY-WINTER - ALL ELECTRIC (Frozen) - Rate Code (1MGAF):				
55	First 180 Hours Use per month		0.08140	0.08219	0.08219
56	Next 180 Hours Use per month		0.04648	0.04691	0.04691
57	Over 360 Hours Use per month		0.04059	0.04099	0.04099
58					
59	E: SEPARATELY METERED S/H-WINTER				
60	SECONDARY - Rate Code (1MGHE; 1MGHH):		0.06206	0.06266	0.06266
61					
62	F: REACTIVE DEMAND ADJUSTMENT - Rate Code (A3):				
63	MGS Secondary		0.000%	0.971%	0.975%
64	MGS Primary		0.000%	0.972%	0.972%
65	MGS Overall Change (*)		0.000%	0.971%	0.974%
66	MGA Secondary		0.000%	0.970%	0.972%
67	MGA Primary		0.000%	0.972%	0.972%
68	MGA Winter Energy Overall Change		0.000%	0.961%	0.961%
69	MGA Overall Change (*)		0.000%	0.970%	0.972%
70	MGS Secondary-Space Heat		0.000%	0.971%	0.973%
71	Winter Price Below Summer (SUM-WIN)SUM		18.499%	18.503%	18.505%
72	Overall Change			0.971%	0.974%
73					
74	Revenue ⁽¹⁾		\$132,376,790	\$133,662,228	\$133,666,431
75	Change in Revenue				\$1,289,641
76					
77	Proposed change per Revenue Summary				\$1,290,708
78					(\$1,067)
79					
80	Manual B ⁽²⁾		\$0	\$0	\$0
81	Overall Revenue		\$132,376,790	\$133,662,228	\$133,666,431
82	Net Metering credits		\$0	\$0	\$0
83	EDR Credits		(\$63,604)		
84	Mpower credits		\$0		
85			\$132,308,186		

A		B	C	D	E
1	Kansas City Power & Light - Missouri				
2	Small General Service				
3					
4	Case No.	ER-2018-0145			
5	Status:	Direct			
6					
7			Current Rates	Rates With Increase	Proposed Rates
8	JURISDICTIONAL INCREASE (%)			0.975%	0.000%
9					
10					
11	A. CUSTOMER CHARGE				
12	Metered Service				
13	0-24 KW - Rate Code (A)		19.08	19.27	19.27
14	25-199 KW - Rate Code (A)		52.90	53.42	53.42
15	200-999 KW - Rate Code (A)		107.46	108.51	108.51
16	1000 KW or above - Rate Code (A)		917.58	926.52	926.52
17	Unmetered Service - Rate Code (1SUSE):		8.01	8.09	8.09
18	Separately Metered Space Heat - Rate Code (1SGHE; 1SGHH; 1SSHE):		2.46	2.48	2.48
19					
20	B. FACILITIES CHARGE				
21	SECONDARY - Rate Code (1SGSE; 1SGSH; 1SSSE; 1SUSE; 1SGAE; 1SGAH; 1SSAE; 1SGHE; 1SGHI; 1SSHE):				
22	First 25 KW		-	-	-
23	All KW over 25 KW		3.074	3.104	3.104
24					
25	PRIMARY - Rate Code (1SGSF; 1SGSG; 1SSSF; 1SGAF; 1SGAG):				
26	First 26 KW		-	-	-
27	All KW over 26 KW		3.002	3.031	3.031
28					
29	C. ENERGY CHARGE				
30	SECONDARY-SUMMER - Rate Code (1SGSE; 1SGSH; 1SSSE; 1SUSE; 1SGAE; 1SGAH; 1SSAE; 1SGHE; 1SGHI; 1SSHE):				
31	First 180 Hours Use per month		0.17032	0.17193	0.17197
32	Next 180 Hours Use per month		0.08083	0.08162	0.08162
33	Over 360 Hours Use per month		0.07200	0.07270	0.07270
34					
35	SECONDARY-WINTER - Rate Code (1SGSE; 1SGSH; 1SSSE; 1SUSE; 1SGHE; 1SGHI; 1SSHE):				
36	First 180 Hours Use per month		0.13233	0.13362	0.13361
37	Next 180 Hours Use per month		0.06461	0.06524	0.06524
38	Over 360 Hours Use per month		0.05832	0.05889	0.05889
39					
40	PRIMARY-SUMMER - Rate Code (1SGSF; 1SGSG; 1SSSF; 1SGAF; 1SGAG):				
41	First 180 Hours Use per month		0.16642	0.16504	0.16804
42	Next 180 Hours Use per month		0.07896	0.07973	0.07973
43	Over 360 Hours Use per month		0.07034	0.07103	0.07103
44					
45	PRIMARY-WINTER - Rate Code (1SGSF; 1SGSG; 1SSSF):				
46	First 180 Hours Use per month		0.12932	0.13059	0.13058
47	Next 180 Hours Use per month		0.06313	0.06375	0.06375
48	Over 360 Hours Use per month		0.05698	0.05752	0.05752
49					
50	SECONDARY-WINTER - ALL ELECTRIC (Frozen) - Rate Code (1SGAE; 1SGAH; 1SSAE):				
51	First 180 Hours Use per month		0.12121	0.12239	0.12239
52	Next 180 Hours Use per month		0.06461	0.06524	0.06524
53	Over 360 Hours Use per month		0.05832	0.05889	0.05889
54					
55	PRIMARY-WINTER - ALL ELECTRIC (Frozen) - Rate Code (1SGAF; 1SGAG):				
56	First 180 Hours Use per month		0.11844	0.11959	0.11959
57	Next 180 Hours Use per month		0.06313	0.06375	0.06375
58	Over 360 Hours Use per month		0.05698	0.05752	0.05752
59					
60	D. SEPARATELY METERED SPACE HEAT - WINTER				
61	SECONDARY - Rate Code (1SGHE; 1SGHH; 1SSHE):				
62			0.07087	0.07156	0.07156
63	E. TWO-PART TIME-OF-USE PRICING ADJUSTMENT				
64	SECONDARY - SUMMER ON-PEAK		0.14606	0.14748	0.14748
65	SECONDARY - SUMMER OFF-PEAK		0.06289	0.06329	0.06329
66	SECONDARY - WINTER ON-PEAK		0.05655	0.05710	0.05710
67	SECONDARY - WINTER OFF-PEAK		0.04880	0.04928	0.04928
68	PRIMARY - SUMMER ON-PEAK		0.13484	0.13615	0.13615
69	PRIMARY - SUMMER OFF-PEAK		0.05922	0.05980	0.05980
70	PRIMARY - WINTER ON-PEAK		0.05488	0.05539	0.05539
71	PRIMARY - WINTER OFF-PEAK		0.04736	0.04782	0.04782
72					
73	SGS Secondary		0.000%	0.977%	0.974%
74	SGS Primary		0.000%	0.974%	0.973%
75	SGS Overall Change (%)		0.000%	0.977%	0.974%
76	SGA Secondary		0.000%	0.976%	0.973%
77	SGA Primary		0.000%	#DIV/0!	#DIV/0!
78	SGA Winter Energy Overall Change		0.000%	0.974%	0.972%
79	SGA Overall Change (%)		0.000%	0.976%	0.973%
80	SGS Secondary Space Heat		0.000%	0.975%	0.972%
81	Winter Price Below Summer (SUM-WNT)/SUM		17.080%	17.080%	17.080%
82	Overall Change			71.397%	71.391%
83					
84	Revenue ⁽¹⁾				
85	Change in Revenue		\$58,389,842	\$58,960,417	\$58,958,507
86					\$568,666.96
87	Proposed change per Revenue Summary				\$568,083
88					(\$395)
89					
90	Manual B/I		\$240	\$242	\$242
91	Overall Revenue		\$58,390,082	\$58,960,660	\$58,958,749
92					
93	EDR Credit		(\$3,984)		
94	Net Metering Credit		(\$115)		
			\$58,385,933		

	A	B	C	D	E
1	Kansas City Power and Light - Missouri				
2	Residential Service				
3					
4	Case No:	ER-2018-0145			
5	Status:	Direct			
6					
7			Current Rates	Rates With Increase	Proposed Rates
8	JURISDICTIONAL INCREASE (%)			0.00%	0.34%
9	A: Customer Charge				
10	General Use (RESA) - Rate Code (1RS1A; 1RSDA; 1RS1B):		12.62	15.17	15.22
11	General Use and S/H (RESB) - Rate Code (1RS6A; 1RFEB):		12.62	15.17	15.22
12	General Use and S/H (RESC) - Rate Code (1RS2A; 1RS3A; 1RW7A; 1RH1A):		12.62	15.17	15.22
13	Additional Meter (RESC) - Rate Code (1RS2A; 1RS3A; 1RW7A; 1RH1A):		2.33	2.33	2.34
14	Other Use (ROU) - Rate Code (1RO1A):		14.95	14.95	17.56
15			12.62	15.17	15.22
16					
17	B: Energy Charge				
18	GENERAL USE (RESA) - SUMMER - Rate Code (1RS1A; 1RSDA; 1RS1B):				
19	First 600 kWh per month		0.12893	0.12893	0.12936
20	Next 400 kWh per month		0.14916	0.14916	0.14966
21	Over 1000 kWh per month		0.14916	0.14916	0.14966
22					
23	GENERAL USE AND S/H (RESB & RESC) - SUMMER - Rate Code (1RS6A; 1RFEB; 1RS2A; 1RS3A; 1RW7A; 1RH1A)				
24	First 600 kWh per month		0.13806	0.13806	0.13852
25	Next 400 kWh per month		0.13806	0.13806	0.13852
26	Over 1000 kWh per month		0.13806	0.13806	0.13852
27					
28	GENERAL USE (RESA) - WINTER - Rate Code (1RS1A; 1RSDA; 1RS1B):				
29	First 600 kWh per month		0.12231	0.12231	0.12272
30	Next 400 kWh per month		0.07396	0.07396	0.07421
31	Over 1000 kWh per month		0.06561	0.06561	0.06583
32					
33	GENERAL USE AND SPACE HEAT (RESB) - WINTER - Rate Code (1RS6A; 1RFEB):				
34	First 600 kWh per month		0.09703	0.09703	0.09736
35	Next 400 kWh per month		0.09703	0.09703	0.09736
36	Over 1000 kWh per month		0.06098	0.06098	0.06119
37					
38	GENERAL USE AND SPACE HEAT (RESC) - WINTER - Rate Code (1RS2A; 1RS3A; 1RW7A; 1RH1A):				
39	First 600 kWh per month		0.12412	0.12412	0.12454
40	Next 400 kWh per month		0.07441	0.07441	0.07466
41	Over 1000 kWh per month		0.06219	0.06219	0.06240
42					
43	SEPARATELY METERED SPACE HEAT - Rate Code (1RS2A; 1RS3A; 1RW7A; 1RH1A):				
44	All kWh - WINTER		0.06239	0.06239	0.06260
45	All kWh - SUMMER		0.13806	0.13806	0.13852
46					
47	Residential Other Use - Rate Code (1RO1A):				
48	WINTER		0.13933	0.13933	0.13980
49	SUMMER		0.17931	0.17931	0.17991
50					
51	Residential Time of Day (Frozen) - Rate Code (1TE1A):				
52	Customer Charge		15.94	15.94	15.99
53	On-Peak - SUMMER		0.21173	0.21173	0.21244
54	Off-Peak - SUMMER		0.11796	0.11796	0.11836
55	All kWh - WINTER		0.08719	0.08719	0.08748
56	Factor RESA			2.340%	2.682%
57	Factor RESA - Winter			3.013%	3.357%
58	Factor RESB			1.679%	2.018%
59	Factor RESB - Winter			2.607%	2.955%
60	Factor RESC			1.781%	2.121%
61	Factor RESC - Winter			2.226%	2.572%
62	Factor T-O-U			0.000%	0.334%
63	Factor Other Use			3.676%	4.024%
64	Overall Change (*)			2.299%	2.641%
65	Winter Price Below Summer (SUM-WIN/SUM)		28.451%	28.451%	28.449%
66					
67	Revenue ⁽¹⁾		\$337,970,232	\$345,738,747	\$346,896,368
68	Change in Revenue				\$8,926,136
69					
70	Proposed change per Revenue Summary				\$8,927,744
71					
72					
73	Manual Bill		\$0	\$0	\$0
74	Overall Revenue		\$337,970,232	\$345,738,747	\$346,896,368
75	Net Metering credit		(\$118)		
76			\$337,970,114		

	A	B	C	D	E	F	G	H
1	Kansas City Power & Light - Missouri							
2	Private Unmetered Lighting Service							
3								
4	Case No:	ER-2018-0145		Juris Increase (%) =				0.939%
5	Status:	Direct						
6								
7	Rate Schedule	Rate Code	Tariff Sheet No.	Description	Current Rate	Proposed Rate	%Δ	MRU Codes
8								
9	AL	1ALDA, 1ALDE	33	5800 Lumen High Pressure Sodium Unit	\$23.93	\$24.15	0.919%	S058
10				8600 Lumen Mercury Vapor Unit	\$25.17	\$25.41	0.954%	M086
11				16000 Lumen High Pressure Sodium Unit	\$27.40	\$27.66	0.969%	H160
12				22500 Lumen Mercury Vapor Unit	\$30.81	\$31.10	0.941%	M225
13				22500 Lumen Mercury Vapor Unit	\$30.81	\$31.10	0.941%	V225
14				27500 Lumen High Pressure Sodium Unit	\$29.14	\$29.41	0.927%	H275
15				50000 Lumen High Pressure Sodium Unit	\$31.79	\$32.09	0.944%	H500
16				63000 Lumen Mercury Vapor Unit	\$40.04	\$40.42	0.946%	V630
17								
18	Optional Charges							
19		1ALDA, 1ALDE	33	Each 30-foot ornamental steel pole installed	\$7.35	\$7.42	0.962%	SP30
20				Each 35-foot ornamental steel pole installed	\$8.39	\$8.47	0.954%	SP35
21				Each 30-foot wood pole installed	\$5.63	\$5.68	0.889%	WP30
22				Each 35-foot wood pole installed	\$6.15	\$6.21	0.976%	WP35
23				Each overhead span of circuit installed	\$4.12	\$4.16	0.971%	SPAN
24				Underground lighting unit	\$3.15	\$3.18	0.952%	U300
25								
26	NOTE: All Current and Proposed rates are by month.							

	A	B	C	D	E	F	G	H	I	J	K	L
1	Kansas City Power & Light - Missouri											
2	Municipal Street Lighting Service											
3												
4	Case No.	ER-2018-0145			Juris Increase (%) = 0.939%							
5	Status:	Direct										
6												
7	Rate Schedule	Rate Code	Tariff	Description	Current Rate		Proposed Rate		%Δ	MRU Codes		
8			Sheet No.	Rate No.	Annual	Monthly	Annual	Monthly				
9	ML	1MLLL	35	1.1	5000 Lumen LED (Class A) Type V pattern	\$249.36	\$20.78	\$251.76	\$20.98	0.902%	LOAS	
10					5000 Lumen LED (Class A) Type V pattern - Twin	\$498.72	\$41.56	\$503.52	\$41.96	0.932%	LOAT	
11				1.2	5000 Lumen LED (Class B) Type II pattern	\$249.36	\$20.78	\$251.76	\$20.98	0.902%	LOBS	
12					5000 Lumen LED (Class B) Type II pattern - Twin	\$498.72	\$41.56	\$503.52	\$41.96	0.932%	LOBT	
13				2.3	7500 Lumen LED (Class C) Type III pattern	\$280.44	\$23.37	\$283.08	\$23.59	0.941%	LOCS	
14					7500 Lumen LED (Class C) Type III pattern - Twin	\$560.88	\$46.74	\$566.16	\$47.18	0.941%	LOCT	
15				2.4	12500 Lumen LED (Class D) Type III pattern	\$299.16	\$24.93	\$301.92	\$25.16	0.923%	LODS	
16					12500 Lumen LED (Class D) Type III pattern - Twin	\$598.32	\$49.86	\$603.84	\$50.32	0.923%	LODT	
17				2.5	24500 Lumen LED (Class E) Type III pattern	\$324.12	\$27.01	\$327.12	\$27.26	0.920%	LOES	
18					24500 Lumen LED (Class E) Type III pattern - Twin	\$648.24	\$54.02	\$654.24	\$54.52	0.923%	LOET	
19				2.1	5000 Lumen LED (Class B) Type II pattern	\$137.16	\$11.43	\$138.48	\$11.54	0.932%	LOBE	
20				2.3	7500 Lumen LED (Class C) Type III pattern	\$188.24	\$14.02	\$189.80	\$14.15	0.927%	LOCE	
21				2.4	12500 Lumen LED (Class D) Type III pattern	\$186.96	\$15.58	\$188.76	\$15.73	0.931%	LODE	
22				2.5	24500 Lumen LED (Class E) Type III pattern	\$211.92	\$17.66	\$213.96	\$17.83	0.933%	LOEE	
23												
24		1MLSL	35A	1.1	9500 Lumen High Pressure Sodium	\$158.04	\$13.17	\$159.48	\$13.29	0.911%	S09E	
25				1.2	16000 Lumen High Pressure Sodium	\$261.72	\$21.81	\$264.12	\$22.01	0.917%	S16E	
26		1MLSL, 1MLML		8.1	8600 Lumen Mercury Vapor	\$274.92	\$22.91	\$277.56	\$23.13	0.930%	M08S	
27					8600 Lumen Mercury Vapor - Twin	\$549.84	\$45.82	\$555.12	\$46.26	0.930%	M08T	
28				8.2	12100 Lumen Mercury Vapor	\$308.28	\$25.69	\$311.16	\$25.93	0.934%	M12S	
29					12100 Lumen Mercury Vapor - Twin	\$616.56	\$51.38	\$622.32	\$51.86	0.934%	M12T	
30				8.3	22500 Lumen Mercury Vapor	\$336.12	\$28.01	\$339.24	\$28.27	0.923%	M22T	
31					22500 Lumen Mercury Vapor - Twin	\$672.24	\$56.02	\$678.48	\$56.54	0.923%	M22T	
32				8.4	9500 Lumen High Pressure Sodium	\$288.32	\$22.36	\$270.84	\$22.57	0.939%	S09S	
33					9500 Lumen High Pressure Sodium - Twin	\$536.64	\$44.72	\$541.68	\$45.14	0.939%	S09T	
34				8.5	16000 Lumen High Pressure Sodium	\$298.92	\$24.91	\$301.68	\$25.14	0.923%	S16S	
35					16000 Lumen High Pressure Sodium - Twin	\$597.84	\$49.82	\$603.36	\$50.28	0.923%	S16T	
36				8.6	27500 Lumen High Pressure Sodium	\$317.76	\$26.48	\$320.76	\$26.73	0.944%	S27S	
37					27500 Lumen High Pressure Sodium - Twin	\$635.52	\$52.96	\$641.52	\$53.46	0.944%	S27T	
38				8.7	50000 Lumen High Pressure Sodium	\$346.56	\$28.88	\$349.80	\$29.15	0.935%	S50S	
39					50000 Lumen High Pressure Sodium - Twin	\$693.12	\$57.76	\$699.60	\$58.30	0.935%	S50T	
40												
41		Optional Equipment										
42		1MLML, 1MLSL,	35A	9.1	Stool Pole	\$18.72	\$1.56	\$18.84	\$1.57	0.931%	OSPL	
43		1MLLL	35B	9.2	Aluminum Pole	\$46.92	\$3.91	\$47.40	\$3.95	1.023%	OAPL	
44				9.3	Underground Service extension under sod	\$78.96	\$6.58	\$79.68	\$6.64	0.912%	OEUS	
45				9.4	Underground Service extension under concrete	\$301.44	\$25.12	\$304.32	\$25.36	0.935%	OEUC	
46				9.5	Breakaway Base	\$43.08	\$3.59	\$43.44	\$3.62	1.034%	OBA8	
47												
48	ML	1MLCL	35B	[10.0,10.1](ii)	Annual Energy Charge	\$0.082		\$0.083				
49				10.0(1)	Code CX [single]	\$85.82	\$5.49	\$66.44	\$5.54	0.911%	C16C	
50				10.0(2)	Code TCX [twin]	\$131.64	\$10.97	\$132.88	\$11.08	1.008%	C16T	
51												
52		3MLSL	36	1.1	9500 Lumen High Pressure Sodium	\$158.04	\$13.17	\$159.48	\$13.29	0.911%	S09E	
53				1.2	16000 Lumen High Pressure Sodium	\$261.72	\$21.81	\$264.12	\$22.01	0.917%	S16E	
54												
55		3MLML, 3MLSL	36A	4.1	8600 Lumen Mercury Vapor	\$274.92	\$22.91	\$277.56	\$23.13	0.930%	M08S	
56					8600 Lumen Mercury Vapor - Twin	\$549.84	\$45.82	\$555.12	\$46.26	0.930%	M08T	
57				4.4	9500 Lumen High Pressure Sodium	\$288.32	\$22.36	\$270.84	\$22.57	0.939%	S09S	
58					9500 Lumen High Pressure Sodium - Twin	\$536.64	\$44.72	\$541.68	\$45.14	0.939%	S09T	
59				4.5	16000 Lumen High Pressure Sodium	\$298.92	\$24.91	\$301.68	\$25.14	0.923%	S16S	
60					16000 Lumen High Pressure Sodium - Twin	\$597.84	\$49.82	\$603.36	\$50.28	0.923%	S16T	
61				4.6	27500 Lumen High Pressure Sodium	\$317.76	\$26.48	\$320.76	\$26.73	0.944%	S27S	
62					27500 Lumen High Pressure Sodium - Twin	\$635.52	\$52.96	\$641.52	\$53.46	0.944%	S27T	
63				4.7	50000 Lumen High Pressure Sodium	\$346.56	\$28.88	\$349.80	\$29.15	0.935%	S50S	
64					50000 Lumen High Pressure Sodium - Twin	\$693.12	\$57.76	\$699.60	\$58.30	0.935%	S50T	
65												

	A	B	C	D	E	F	G	H	I	J	K	L	
66													
67													
68													
69													
70													
71													
72													
73													
74	ML	3MLCL	36B	6.2	8800 Lumen - Limited Maintenance	\$133.88	\$11.14			\$134.88	\$11.24	0.838%	C08L
75				6.3	22500 Lumen - Limited Maintenance	\$290.76	\$24.23			\$293.52	\$24.46	0.843%	C22L
76				6.4	9500 Lumen - Limited Maintenance	\$133.88	\$11.14			\$134.88	\$11.24	0.835%	C09L
77				6.5	27500 Lumen - Limited Maintenance	\$290.76	\$24.23			\$293.52	\$24.46	0.849%	C27L
78													
79	ML-LED	1MLLL (LED)	48A	11.1	Small LED (≤ 7000 lumens)	\$268.32	\$22.36			\$270.84	\$22.57	0.830%	L03S
80					Small LED (≤ 7000 lumens) - Twin	\$536.64	\$44.72			\$541.68	\$45.14	0.830%	L03T
81				11.2	Large LED (> 7000 lumens)	\$298.92	\$24.91			\$301.68	\$25.14	0.823%	L07S
82					Large LED (> 7000 lumens) - Twin	\$597.84	\$49.82			\$603.36	\$50.28	0.820%	L03T
83													
84													
85													
86				12.1	Ornamental stool polo	\$18.72	\$1.56			\$18.84	\$1.57	0.841%	OSPL
87				12.2	Aluminum polo	\$46.92	\$3.91			\$47.40	\$3.95	0.824%	OAPL
88				12.3	Underground service extension under sod	\$78.96	\$6.58			\$79.68	\$6.64	0.812%	OEUS
89				12.4	Underground service extension under concrete	\$301.44	\$25.12			\$304.32	\$25.36	0.956%	OEUC
90				12.5	Breakaway base	\$43.08	\$3.59			\$43.44	\$3.62	0.838%	OBAB
91													

	A	B	C	D	E	F	G	H	I	J
1	Kansas City Power & Light - Missouri									
2	Off-Peak Lighting Service									
3										
4	Case No.	ER-2018-0145			Juris Increase (%) =	0.939%				
5	Status:	Direct								
6										
7	Rate Schedule	Rate Code	Sheet No.	Tariff Rate No.	Description	Current Rate	Proposed Rate	%Δ		
9	OLS	10LSL	45	1.1	Total Watts X MBH X BLF + 1000	\$0.08302	\$0.08380	0.940%		
10				1.2	First 100 Watts X MBH X BLF + 1000	\$0.08302	\$0.08380	0.940%		
11					Excess over 100 Watts X MBH X BLF + 1000	\$0.07767	\$0.07840	0.940%		
12				1.3	First 100 Watts X MBH X BLF + 1000	\$0.08302	\$0.08380	0.940%		
13					Next 50 Watts X MBH X BLF + 1000	\$0.07767	\$0.07840	0.940%		
14					Excess over 150 Watts X MBH X BLF + 1000	\$0.07498	\$0.07568	0.934%		
15				1.4	First 100 Watts X MBH X BLF + 1000	\$0.08302	\$0.08380	0.940%		
16					Next 150 Watts X MBH X BLF + 1000	\$0.07498	\$0.07568	0.934%		
17					Excess over 250 Watts X MBH X BLF + 1000	\$0.06828	\$0.06892	0.937%		
18				1.5	First 100 Watts X MBH X BLF + 1000	\$0.08302	\$0.08380	0.940%		
19					Next 300 Watts X MBH X BLF + 1001	\$0.06828	\$0.06892	0.937%		
20					Excess over 400 Watts X MBH X BLF + 1000	\$0.06828	\$0.06892	0.937%		
21			45A	2.1	Total Watts X MBH X BLF + 1000	\$0.08302	\$0.08380	0.940%		
22										
23	NOTE: All customers under this rate code (10LSL) are billed through PeopleSoft. Rates are not in CIS.									
24										

	A	B	C	D	E	F	G	H	I
1	Kansas City Power & Light - Missouri								
2	Municipal Traffic Control Signal Service								
3									
4	Case No.	ER-2018-0145			Juris Increase (%) =		0.939%		
5	Status:	Direct							
6									
7	Rate Schedule	Rate	Tariff		Description	Current Rate	Proposed Rate	%Δ	MRU Codes
8		Code	Sheet No.	Rate No.					
9	TR	1TSLM	37	1	Individual Control	\$202.74	\$204.64	0.937%	1CTL
10				3A	1-Way, 1-Light Signal Unit	\$47.75	\$48.20	0.942%	1W1L
11				3B	4-Way, 1-Light Signal Unit - Suspension	\$56.53	\$57.06	0.938%	4W1L
12				4	Pedestrian Push Button Control	\$169.69	\$171.28	0.937%	BUTN
13			37A	6	Multi-Phase Electronic Control	\$489.62	\$494.22	0.940%	4PEC
14									
15	Optional Equipment								
16			37A	4	3-Light Signal Unit	\$28.85	\$29.12	0.936%	3LTU
17				5	2-Light Signal Unit	\$27.76	\$28.02	0.937%	2LTU
18				6	1-Light Signal Unit	\$8.69	\$8.77	0.931%	1LTU
19				7	Pedestrian Control Equipment	\$3.87	\$3.91	1.034%	PBPR
20			37B	8	12-Inch Round Lens	\$7.04	\$7.11	0.994%	12RD
21				9	9-Inch Square Lens	\$7.97	\$8.04	0.878%	09IN
22				11a	Vehicle - Actuation Unit - Loop Detector - Single	\$36.09	\$36.43	0.942%	LP01
23				11b	Vehicle - Actuation Unit - Loop Detector - Double	\$57.26	\$57.80	0.940%	LP02
24				12	Flasher Equipment	\$10.24	\$10.34	0.977%	FLEQ
25				13a	Mast Arm - Style 2	\$47.95	\$48.40	0.936%	ARM2
26				13b	Mast Arm - Style 3	\$47.53	\$47.98	0.947%	ARM3
27			37C	14	Back Plate	\$2.19	\$2.21	0.910%	PLTE
28				15	Wood Pole Suspension	\$22.22	\$22.43	0.945%	WPSU
29				18	Traffic Signal Pole	\$12.19	\$12.30	0.902%	POLE
30									
31	NOTE: All Current and Proposed rates are by month.								
32									

	A	B	C	D	E	F	G
1	Kansas City Power & Light - Missouri						
2	Two-Part - Time of Use Pricing (Frozen)						
3							
4	Case No.	ER-2018-0145		Juris Increase (%) =	0.939%		
5	Status:	Direct					
6							
7	Rate Schedule	Tariff Sheet No.	Voltage or Charge	Description	Current Rate	Proposed Rate	%Δ
8	TPP	20C	Secondary	Winter On-Peak			
9				SGS, SGA	\$0.05655	\$0.05708	0.937%
10				MGS, MGA	\$0.04910	\$0.04956	0.937%
11				LGS, LGA	\$0.04701	\$0.04750	1.047%
12				LPS	\$0.04119	\$0.04158	0.947%
13				Winter Off-Peak			
14				SGS, SGA	\$0.04880	\$0.04926	0.945%
15				MGS, MGA	\$0.03946	\$0.03983	0.937%
16				LGS, LGA	\$0.03791	\$0.03831	1.015%
17				LPS	\$0.03460	\$0.03493	0.954%
18				Summer On-Peak			
19				SGS, SGA	\$0.14606	\$0.14743	0.928%
20				MGS, MGA	\$0.13196	\$0.13320	0.924%
21				LGS, LGA	\$0.12770	\$0.12904	1.049%
22				LPS	\$0.11972	\$0.12084	0.929%
23				Summer Off-Peak			
24				SGS, SGA	\$0.06268	\$0.06327	0.941%
25				MGS, MGA	\$0.05229	\$0.05278	0.937%
26				LGS, LGA	\$0.05000	\$0.05052	1.046%
27				LPS	\$0.04447	\$0.04489	0.944%
28							
29				Primary			
30				Winter On-Peak			
31				SGS, SGA	\$0.05486	\$0.05538	0.946%
32				MGS, MGA	\$0.04762	\$0.04807	0.945%
33				LGS, LGA	\$0.04561	\$0.04609	1.072%
34				LPS	\$0.03995	\$0.04033	0.951%
35				Winter Off-Peak			
36				SGS, SGA	\$0.04736	\$0.04780	0.929%
37				MGS, MGA	\$0.03829	\$0.03885	1.467%
38				LGS, LGA	\$0.03678	\$0.03717	1.067%
39				LPS	\$0.03380	\$0.03392	0.932%
40				Summer On-Peak			
41				SGS, SGA	\$0.13484	\$0.13611	0.942%
42				MGS, MGA	\$0.12180	\$0.12294	0.929%
43				LGS, LGA	\$0.11788	\$0.11912	1.022%
44				LPS	\$0.11050	\$0.11154	0.941%
45				Summer Off-Peak			
46				SGS, SGA	\$0.05822	\$0.05978	0.945%
47				MGS, MGA	\$0.04943	\$0.04989	0.941%
48				LGS, LGA	\$0.04725	\$0.04775	1.059%
49				LPS	\$0.04204	\$0.04243	0.935%
50				Substation			
51				LPS			
52				Winter On-Peak	\$0.03646	\$0.03683	0.985%
53				Winter Off-Peak	\$0.03313	\$0.03344	0.922%
54				Summer On-Peak	\$0.10343	\$0.10440	0.929%
55				Summer Off-Peak	\$0.04148	\$0.04187	0.940%
56				Transmission			
57				LPS			
58				Winter On-Peak	\$0.03920	\$0.03957	0.940%
59				Winter Off-Peak	\$0.03291	\$0.03322	0.946%
60				Summer On-Peak	\$0.10307	\$0.10404	0.941%
61				Summer Off-Peak	\$0.04121	\$0.04160	0.946%
62				Program Charge			
63	20D			SGS and SGA Customers	\$11.60	\$11.71	0.948%
64				All other Customers	\$34.81	\$35.14	0.949%
65	NOTE: All Current and Proposed Program Charge rates are by month. The rate design for all Secondary and Primary TPP customers within the SGS and						
66	LGS rate classes are adjusted separately through the rate design of their respective rate classification.						
67							

	A	B	C	D	E	F	G
1	Kansas City Power & Light - Missouri						
2	Standby Service for Self-Generating Customer (Frozen)						
3	Standby or Breakdown Service						
4							
5	Case No.	ER-2018-0145			Juris Increase (%) =	0.939%	
6	Status:	Direct					
7							
8	Rate Schedule	Tariff Sheet No.	Description	Current Rate	Proposed Rate	%Δ	
9	SGC	28B	11:00 a.m. - 2:00 p.m.	\$0.03294	\$0.03325	0.941%	
10			2:00 p.m. - 6:00 p.m.	\$0.08048	\$0.08124	0.944%	
11			6:00 p.m. - 7:00 p.m.	\$0.03294	\$0.03325	0.941%	
12							
13	SA	30	Demand Charge (per kW of demand)	\$15.963	\$16.113	0.940%	
14			Energy Charge (per kWh)	\$0.19771	\$0.19957	0.941%	
15							
16							

Kansas City Power and Light Missouri Proposed Non-Rate Tariff Revisions

Case No. ER-2018-0145

Tariff Book	Tariff Sheet No.	Name of Schedule	Proposed Change	Support
Rates	TOC-(1,2)	Table of Contents	Adjust language to no longer reference tariff sheet nos. identifying the Real Time Pricing program and Two-Part Time-of-Use schedule.	The Company is proposing to eliminate both its Real-Time Pricing Program and Two-Part Time-of-Use schedule. There are no customers served on these frozen rates. Additionally, the administrative effort to continue to offer this unused product and maintain the tariff is overly burdensome.
			include the proposed Schedule RTOU, Schedule RD, and Schedule RDTOU.	The Company is proposing to add three Residential pilot programs to its Rate Book 7: (1) Residential Time of Use Pilot; (2) Residential Demand Pilot; and (3) the Residential Demand plus Time of Use Pilot based on findings from multiple rate design studies conducted in the Company's GMO jurisdiction.
			Include the proposed Schedule CCN	The Company is proposing to add a Public Electric Vehicle Charging Station Service to its Rate Book 7 for both residential and non-residential customers.
			Include the proposed Schedule RER.	The Company is proposing to add a Renewable Energy Rider Program to its Rate Book 7 to provide its non-residential customers with a voluntary opportunity to purchase renewable energy.
			Include the proposed Schedule SSP	The Company is proposing to add a Solar Subscription Pilot Rider to its Rate Book 7 for all customer classes.
			Include the proposed Schedule SSR and retire Schedule SGC	The Company is proposing to eliminate its current Standby Service for Self-Generating Customers and replace it with its proposed Standby Service Rider in an effort to maintain consistency among jurisdictions.
			Retire Schedule SA	The Company is proposing to eliminate its Standby or Breakdown Service. There are no customers served on this rate. Additionally, the administrative effort to continue to offer this unused product and maintain the tariff is overly burdensome.
			Adjust language to mark Schedule AL as Frozen.	The Company is proposing to freeze its Private Unmetered Lighting Service and implement an original Private Unmetered LED Lighting Service for new customers.
			Retire MEEIA Cycle 1 Schedule MP	The Company is proposing to eliminate its MEEIA Cycle 1 MPower program because this program is not available after April 1, 2016.
			Include proposed Schedule PL	The Company is proposing to add a Private Unmetered LED Lighting Service to its Rate Book 7 to phase out its current Private Area Lighting rate schedules.

Kansas City Power and Light Missouri Proposed Non-Rate Tariff Revisions

Case No. ER-2018-0145

Tariff Book	Tariff Sheet No.	Name of Schedule	Proposed Change	Support
	7-7A	Residential Time of Use Pilot (New)	Create original Schedule RTOU.	The Company is proposing to add a Residential Time of Use pilot program to its Rate Book 7 based on findings from multiple rate design studies conducted in the Company's GMO jurisdiction.
	7(B-C)	Residential Demand Pilot (New)	Create original Schedule RD.	The Company is proposing to add a Residential Demand pilot program to its Rate Book 7 based on findings from multiple rate design studies conducted in the Company's GMO jurisdiction.
	7(D-E)	Residential Demand plus Time of Use Pilot (New)	Create original Schedule RDTOU.	The Company is proposing to add a Residential Demand plus Time of Use pilot program to its Rate Book 7 based on findings from multiple rate design studies conducted in the Company's GMO jurisdiction.
	9A, 10A, 11A	Misc. schedules	Adjusted language to add rate codes reflected by rate design.	The Company is proposing to add language identifying Space Heating rate codes along with Secondary General Use rate codes as both share the same charges not including a space heat energy charge.
	9B	Small General Service	Remove Unmetered Service	The SGS Primary rate design does not include an Unmetered Service charge.
	((9-11),14E, 18,49))E, (17,19)D, 49O	Misc. schedules	Adjust language referencing Non-MEEIA Opt Out Provisions location in tariff.	The Company's proposal to add a Restoration charge will require an adjustment to the Rule Nos. of Section 8 in the Rules and Regulation Book 2, thereby, adjusting Rule No. 8.09 to 8.10.
	16, 16(A-B)	Clean Charge Network (New)	Create original Schedule CCN.	The Company is proposing to add a Clean Charge Network to its Rate Book 7 for both residential and non-residential customers.
	21, 21(A-D)	Mpower Rider	Retire Schedule MP	The Company is proposing to eliminate its MEEIA Cycle I MPower program because this program is not available after April 1, 2016.
	20, 20(A-E)	Two-Part Time-of-Use	Retire Schedule TPP	The Company is proposing to eliminate its Two-Part Time-of-Use schedule. There are no customers served on these frozen rates. Additionally, the administrative effort to continue to offer this unused product and maintain the tariff is overly burdensome.
	22	Thermal Storage Rider	Delete reference to the Real-Time Pricing and Real-Time Pricing Plus Programs.	The Company is proposing to eliminate the Real-Time Pricing Program and Two-Part Time-of-Use schedule from its Rate Book 7.
	25-25(A-D)	Real-Time Pricing	Retire Schedule RTP	The Company is proposing to eliminate both its Real-Time Pricing Program schedule. There are no customers served on these frozen rates. Additionally, the administrative effort to continue to offer this unused product and maintain the tariff is overly burdensome.

Kansas City Power and Light Missouri Proposed Non-Rate Tariff Revisions

Case No. ER-2018-0145

Tariff Book	Tariff Sheet No.	Name of Schedule	Proposed Change	Support
	26-26(A-D)	Real-Time Pricing Plus	Retire Schedule RTP-Plus	The Company is proposing to eliminate both its Real-Time Pricing Program schedule. There are no customers served on these frozen rates. Additionally, the administrative effort to continue to offer this unused product and maintain the tariff is overly burdensome.
	28-28(A-E)	Standby Service Rider (New)	Retire Schedule SGC and propose new Schedule SSR.	The Company is proposing to retire it's current Standby Service for Self-Generating Customers and propose a Standby Service Rider in its place.
	29-29(A-D)	Special Contract Service	Adjust language and retire Sheet Nos. 29(C-D)	The Company is proposing to adjust the language within its Special Contract Service to reflect the proposed elimination of both the Real-Time Pricing program and the Two-Part Time-of-Use schedule.
	30, 30A	Standby or Breakdown Service	Retire Schedule SA	The Company is proposing to eliminate its Standby or Breakdown Service as it is frozen and there are no contracted customers. Additionally, the tariff is not available to customers after January 10, 1966.
	33, 33(A-B)	Private Unmetered Lighting Service	Mark sheets as frozen.	The Company is proposing to freeze its Private Unmetered Lighting Service and propose an original Private Unmetered LED Lighting Service to be made available to future customers.
	35, 35(A-B)	Municipal Street Lighting Service	(1) Adjust the language to re-define the availability of Schedule ML; (2) adjust language in Section 9.1 to reflect a Metal pole and not a steel pole; (3) eliminate Section 9.2 of Schedule ML and adjust successive Section Nos; (4) to grant customers the opportunity to us light types other than High Pressure Sodium Vapor; and (5) add an LED option not available at time of LED rollout.	The Company is proposing to adjust the language of its Municipal Street Lighting Service to closer align it across jurisdictions with that of the Company's GMO territory.
	39, 39(A-E)	Solar Subscription Pilot Rider (New)	Create original Schedule SSP.	The Company is proposing to add a a Solar Subscription Pilot Rider to its Rate Book 2 for all customers.
	40, 40(A-G)	Renewable Energy Rider (New)	Create original Schedule RER.	The Company is proposing to add a Renewable Energy Rider.
	44, 44(A-B)	Private Unmetered LED Lighting Service	Create original Schedule PL.	The Company is proposing to add an original Private Unmetered LED Lighting Service for both residential and non-residential customers to its Rate Book 7 in an effort to replace its current Private Area Lighting rate schedules.
	45	Off-Peak Lighting Service	Adjust the language to re-define the availability of Schedule OLS to include both metered and unmetered customers.	The Company is proposing to adjust the language of its Off-Peak Lighting Service that allow for flexibility in the metering approach and to better coordinate service across jurisdictions.

Kansas City Power and Light Missouri Proposed Non-Rate Tariff Revisions

Case No. ER-2018-0145

Tariff Book	Tariff Sheet No.	Name of Schedule	Proposed Change	Support
	50.(11-19), 50.(21-31)	Fuel Adjustment Clause	Adjust language to account for operational changes.	The Company is proposing: (1) to resubmit the current FAC tariffs identified on Sheet Nos. 50.11 – 50.19 with an update to the language within the subtitle of each making them applicable for service provided from June 8, 2017 through the effective date of the proposed ER-2018-0145 rate case, as these are the FAC rules and rates currently in effect; and (2) to submit a new set of Original Tariff Sheets 50.21 – 50.31 as part of our ER-2018-0145 Rate Case that will update language for operational changes as well as update the allowable SPP transmission percentage recoverable through the FAC to 2016 FERC Form 1 data, update the base rate to reflect current net fuel costs and net system input, add language to establish additional voltage levels with regard to the FAC tariff rate recovery, and to add language related to the Renewable Energy Rider tariff.

Kansas City Power and Light Missouri Proposed Non-Rate Tariff Revisions

Case No. ER-2018-0145

Tariff Book	Tariff Sheet No.	Name of Schedule	Proposed Change	Support
Rules and Regulations	1(.02, .03)	Table of Contents	Adjust language to reflect proposed changes in Rule Nos.	The Company's proposal to add a Restoration Charge will require adjusting the Rule Nos. for Sections (3,8).
	1.04	Table of Contents	Adjust Language to reflect Rule 9.07 on Sheet 1.30F.	The Company's proposal to add Rule 9.04(D) requires movement of Rule 9.07 to Sheet No. 1.30F.
	1.04C	Table of Contents	Adjust language to delete Item #17 Home Appliance Recycling Rebate and make it Reserve For Future Use	The Table of Contents does not reflect the prior removal of the Home Appliance Recycling Rebate.
1.14	Supplying Electric Service	1) Adjust language in Rule 3.14; 2)Add Rule 3.15 Restoration of Electric Service; 3) Reorder Rule Nos.	The Company is proposing to add a rule Rule 3.15 to its Rules and Regulations Book 2, thereby adjusting the Rule Nos. of successive rules within Section 3, that states if any customer were to terminate their electric service and request the Company to reconnect service within one years time, they must pay a Restoration Charge on top of any unpaid balance before electric service may be connected again. Furthermore, the Company is also proposing to adjust the language of Rule 3.14 so that the Customer may not become confused between a Reconnection and Restoration Charge. This proposed language will maintain consistency of Rules and Regulations books across jurisdictions.	
1.24 B-C	Metering	Place a space between the header and the first bullet.	To maintain format consistency throughout the Rules and Regulations Book 2.	
1.27	Billing and Payment	Add Rule 8.06 and adjust successive Rule Nos.	The Company is proposing to add a Rule 8.06 to its Rules and Regulations Book 2 defining the Restoration Charge applicable through the Company's proposed Rule 3.15.	
1.28	Billing and Payment	Adjust Rule Nos. to incorporate the addition of Rule 8.06.	The Company's proposal to add a Rule 8.06 require adjusting successive Rule Nos. throughout Section 8 of the Rules and Regulations Book 2.	
1.30 D-E	Extension of Electric Facilities	Adjust language to add Rule 9.04(D)	The Company is proposing to add Rule 9.04(D) to its Rules and Regulations Book 2 identifying construction charge reduction amounts specific for Residential and Non-Residential customers who locate Distribution Extensions on underutilized circuits.	
1.30F	Extension Upgrade	Remove language from Sheet 1.30E and place on Sheet 1.30F.	The Company's proposal to add Rule 9.04(D) requires expansion of Rule 9.07 to Sheet No. 1.30F.	
1.42	Private, Unmetered Protective Lighting Service	Remove Application for Private Area Lighting Service as it is no longer applicabie	The Company is proposing to adjust the language of Rule 12.03 to remove the Application for Private Area Lighting Service and identify through Rule 12.03 that the Company may enter into agreements with customers or prospective customers as needed to complete requests for service that are relative to private or unmetered protective lighting.	

Kansas City Power and Light Missouri Proposed Non-Rate Tariff Revisions

Case No. ER-2018-0145

Tariff Book	Tariff Sheet No.	Name of Schedule	Proposed Change	Support
	2	Business Demand Side Management	Remove references to RTP and fix the format of the footer.	To maintain format consistency throughout the Rules and Regulations Book 2.
	2.24	Residential Demand Side Management	Fix the format of the footer.	To maintain format consistency throughout the Rules and Regulations Book 2.

KCP&L - Missouri Jurisdiction Class REVENUE SUMMARY - For Direct filing - ER-2018-0145

	(A)	(B)	(C)	(D)	(E)	F=B-(C+D)	H=F*(%) 1.88%			
MISSOURI RATE GROUP	Weather Normalized CG kWh	Revenue from Existing Rates (Including FAC, DSIM, EDR)(1)	FAC Rider/Adjustments	DSIM Rider/Adjustments	EDR credits**	Revenue from Existing Rates less FAC & DSIM adjustments (1)*	Requested Increase from Rev Model excluding EDR gross-up (Equal Increase)	Adj Request-FAC Impact (Lighting Spread to other classes)	Proposed Revenue - Full Increase	
LARGE POWER TOTAL	1,945,646,593	\$ 154,588,113	\$ 5,902,200	\$ 6,547,602	\$ (1,884,376)	\$ 141,586,547	\$ 2,660,038	-\$349,147	\$142,968,366	
LARGE GEN SVC TOTAL	2,051,190,274	\$ 211,259,269	\$ 6,307,429	\$ 14,949,613	\$ (1,038,756)	\$ 190,002,227	\$ 3,569,590	\$11,854	\$191,853,849	
MEDIUM GEN SVC TOTAL	1,209,196,315	\$ 144,932,920	\$ 3,553,546	\$ 9,073,815	\$ (68,604)	\$ 132,305,559	\$ 2,485,838	\$188,159	\$133,594,912	
SMALL GEN SVC TOTAL	418,577,203	\$ 62,840,412	\$ 1,256,299	\$ 3,198,129	\$ (3,984)	\$ 58,385,983	\$ 1,096,903	\$177,590	\$58,954,970	
RESIDENTIAL TOTAL	2,591,713,540	\$ 353,723,045	\$ 6,878,525	\$ 8,874,407	\$ (\$118)	\$ 337,970,114	\$ 6,349,478	\$8,927,744	\$349,243,691	
MO Metered TOTALS	8,216,323,925	\$ 927,343,759	\$ 23,898,000	\$ 42,643,566	\$ (2,995,838)	\$ 860,252,430	\$ 16,161,647	\$ 8,956,000	\$ 876,615,788	
MO Lighting TOTAL:	83,584,174	\$ 10,999,456	\$ 262,762	\$ -	\$ -	\$ 10,736,694	\$ 201,711		\$10,736,694	
MO TOTAL	8,299,908,098	\$ 938,343,216	\$ 24,160,762	\$ 42,643,566	\$ (2,995,838)	\$ 870,989,124	\$ 16,363,358	\$ 8,956,000	\$ 887,352,482	

(1) All classes' revenues reflect both EDR/Power(DRI) credits and Manual Bill revenue.

*Across all classes, consistent with the MEEIA S&A, adjustment of total year retail base sales are made to reflect MEEIA low kWh savings. A DSIM LPS non-customer specific adjustment was made of \$549,763.85. Note: All other adjustments were made at the customer level consistent with all other LPS adjustment/revenues.

** Includes Mpower Credits and net metering credits.

KCP&L - Missouri Jurisdiction Class REVENUE SUMMARY - For Direct filing - ER-2018-0145

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MISSOURI RATE GROUP	Weather Normalized CG kWh	Revenue from Existing Rates (Including FAC, DSIM, EDR)(1)	FAC Rider/Adjustments	DSIM Rider/Adjustments	EDR credits**	Revenue from Existing Rates less FAC & DSIM adjustments (1)*	Requested Increase from Rev Model excluding EDR gross-up (Equal Increase)	Requested Increase- Revenue Shifts with EDR gross up	Proposed Revenue (1)
LARGE POWER TOTAL	1,945,846,593	\$ 154,588,113	\$ 5,902,200	\$ 6,547,602	\$ (1,884,376)	\$ 141,588,547	\$ 2,660,038	\$ 1,415,662	\$ 142,968,366
LARGE GEN SVC TOTAL	2,051,190,274	\$ 211,259,269	\$ 6,307,429	\$ 14,949,813	\$ (1,038,756)	\$ 190,002,227	\$ 3,569,590	\$ 1,871,381	\$ 191,853,849
MEDIUM GEN SVC TOTAL	1,209,198,315	\$ 144,932,920	\$ 3,553,546	\$ 9,073,815	\$ (68,604)	\$ 132,305,559	\$ 2,485,638	\$ 1,290,658	\$ 133,594,912
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MO Metered TOTALS	8,216,323,925	\$ 927,343,759	\$ 23,898,000	\$ 42,643,566	\$ (2,995,838)	\$ 860,252,430	\$ 16,161,647	\$ 16,420,344	\$ 876,615,788
MO Lighting TOTAL:	83,584,174	\$ 10,999,456	\$ 262,762	\$ -	\$ -	\$ 10,736,694	\$ 201,711		\$ 10,736,694
MO TOTAL	8,299,908,098	\$ 938,343,216	\$ 24,160,762	\$ 42,643,566	\$ (2,995,838)	\$ 870,989,124	\$ 16,363,358	\$ 16,420,344	\$ 887,352,482

(1) All classes' revenues reflect both EDR/Power(DRI) credits and Manual Bill revenue.

*Across all classes, consistent with the MEEIA S&A, adjustment of test year retail base sales are made to reflect MEEIA kw/kWh savings. A DSIM LPS non-customer specific adjustment was made of \$549,753.85. Note: All other adjustments were made at the customer level consistent with all other LPS adjustment/revenues.

** Includes Mpower Credits and not metering credits.