EXHIBIT

OPC 227

Exhibit No.:	
Issues:	Rate Design Greenwood Solar
Witness:	Donald Johnstone
Type of Exhibit:	Rebuttal Testimony
Sponsoring Party:	OPC
Case Number:	ER-2016-0156
Date Testimony Prepared:	August 15, 2016

Kansas City Power & Light
Greater Missouri Operations
(GMO)

Case No. ER-2016-0156

Prepared Rebuttal Testimony of

Donald Johnstone

On behalf of

Office of Public Counsel
(OPC)

August, 2016

Competitive Energy
DYNAMICS

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of KCP&L Greater	)	
Missouri Operations Company's	)	
Request for Authority to Implement	)	Case No. ER-2016-0156
a General Rate Increase for	)	
Electric Service	)	

AFFIDAVIT OF Donald Johnstone

STATE OF MISSOURI)
) ss
COUNTY OF Camden)

Donald Johnstone, of lawful age and being first duly sworn, deposes and states:

1. My name is Donald Johnstone. I am the owner of Competitive Energy Dynamics, L.L.C.

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

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

Donald Johnstone

Subscribed and sworn to me this 15th day of August, 2016.

Carolyn Neporady

CAROLYN NEPORADNY
Notary Public - Notary Seal
State of Missouri
Commissioned for Camden County
My Commission Expires: August 30, 2017
Commission Number: 13452654

Before the
Missouri Public Service Commission

Kansas City Power & Light
Greater Missouri Operations
(GMO)

Case No. ER-2016-0156

Table of Contents
For the
Rebuttal Testimony of Donald Johnstone

Class Cost Of Service 2

Rate Consolidation..... 4

Allocation of Greenwood Solar Project Costs 10

Before the
Missouri Public Service Commission

Kansas City Power & Light
Greater Missouri Operations
(GMO)

Case No. ER-2016-0156

Prepared Rebuttal Testimony of Donald Johnstone

Q PLEASE STATE YOUR NAME AND ADDRESS.

A My name is Donald Johnstone and my business address is 384 Black Hawk Drive, Lake Ozark, Missouri, 65049. I am employed by Competitive Energy Dynamics, L.L.C.

Q ON WHOSE BEHALF ARE YOU APPEARING?

A I am appearing on behalf of the State of Missouri, Office of Public Counsel ("OPC"). The customers of Kansas City Power and Light Company's Greater Missouri Operations ("GMO" or "Company") directly represented by OPC in matters of rate design in this case are those served under the Residential and Small General Service Rate schedules.

Q PLEASE STATE YOUR QUALIFICATIONS AND EXPERIENCE.

A I have been working in the utility business since 1973. I started as an engineer for the Union Electric Company where I had assignments in power operations and corporate planning. Since 1981, I have worked as a consultant in the field of utility regulation. My work has taken me to many states and I have addressed various matters including rate design, the cost of service, fuel costs, forecasting, resource planning, and

industry restructuring. My experience has included electric, gas, water, sewer, and steam utility services. A more complete description is set forth in Appendix A.

CLASS COST OF SERVICE

Q WHAT IS THE DIRECT TESTIMONY ON THE MATTER OF CLASS COST-OF-SERVICE STUDY?

A GMO submitted a class cost-of-service study for each division and also a study based on the consolidated customer classes that it proposes.

Staff declined to prepare a study because of deficiencies in the load research data in the context of the proposed consolidated classes.

Midwest Energy Consumers Group ("MECG") and Missouri Industrial Energy Consumers ("MIEC") did not prepare a class cost-of-service study, but their expert presents a discussion of a method MECG/MIEC would have supported if they had filed a class cost-of-service study.

Other parties, including OPC, did not address the matter in direct testimony.

Q DOES THE PROPOSED RATE CONSOLIDATION RELATE IN ANY WAY TO THE CLASS COST-OF-SERVICE STUDY TESTIMONIES?

A Yes. First, I note that the power and general service customer classes were and are defined differently in the L&P and MPS rates. For the consolidated rates there is yet another definition. As a consequence, load research performed for the present customer classes is of limited value in the context of the rate consolidation proposal. In fact, even after moving customers from their existing rate to a corresponding consolidated rate, additional analysis was necessary to find the most economical rate

alternative for each customer. Assuming consolidation procedes, the result will be customer classes with new combinations of customers coming from various pre-consolidation rate classes. Additional future analysis will be necessary to determine the contributions of the new customer classes to the demands used for cost allocations in a class cost-of-service study.

Q **WHAT IS YOUR RESPONSE TO PUBLIC SERVICE COMMISSION STAFF ("STAFF") TESTIMONY ADDRESSING THE ISSUE OF CLASS COST OF SERVICE?**

A I agree that GMO provided information that is inadequate for preparation of a useful consolidated class cost-of-service study. Even the composition of the customer classes has been fluid. Certainly the customers that comprise the customer classes must be defined before there can be a reliable estimate of the class demand characteristics for class cost-of-service study purposes.

Q **WHAT IS YOUR RESPONSE TO MECG/MIEC TESTIMONY ADDRESSING THE ISSUE OF CLASS COST OF SERVICE?**

A Mr. Maurice Brubaker, submitting testimony on behalf of MECG/MIEC, states: "... in light of the recommendation for an equal percentage increase, I do not believe that it is an issue that needs to be addressed in this case." He did not prepare a class cost-of-service study and only describes a class cost-of-service study methodology he would propose if he were to prepare a study. Since there is no MECG/MIEC study, there is no need for a response at this time. My silence as to what he would propose should not be construed as agreement with the method he describes.

Q **WHAT IS YOUR COMMENT ON THE GMO TESTIMONY ON THE MATTER OF CLASS COST OF SERVICE?**

A GMO addressed the limitations of the load research data in the context of its consolidated class cost-of-service study. GMO also proposed an equal percentage spread of the proposed increase among customer classes.

Q **IS THERE A STIPULATION BEFORE THE COMMISSION THAT WOULD PROVIDE FOR A SPREAD OF THE INCREASE AMONG THE CLASSES ON AN EQUAL PERCENTAGE BASIS?**

A Yes. As this testimony is drafted, I am aware that parties are working to provide what the Commission needs for early approval of the stipulation. For the purposes of this testimony I will assume approval of the stipulation in the near future and that will resolve the matter for the purposes of this docket. Of course, OPC plans to offer relevant testimony in future GMO cases when class cost-of-service study matters are again ripe for decision.

RATE CONSOLIDATION

Q **ARE THERE EXTRAORDINARY INDIVIDUAL CUSTOMER IMPACTS IDENTIFIED IN THE DIRECT TESTIMONY OF GMO?**

A Not in a direct way. GMO showed the impact of moving L&P customers to MPS rates and *vice versa*. Under this analysis, thousands of customers were shown to have impacts several times the 8.2% overall increase under this analysis.

GMO testimony did not provide the individual customer impacts under its proposed rates because the work was not complete at that time. Although GMO had not fully analyzed the impacts before it filed the proposed rates, there certainly are

extraordinary individual customer impacts. The reasons stem from many factors that have been documented. Among the causes are:

- Customer charge increases
- New customer class definitions
- Changes from two different existing structures to a new one that in many respects follows the KCPL mold
- Migration of customers between customer classes
- Charges based on rate elements that are a not a part of existing rates

Q DOES THE STIPULATION THAT ADDRESSES THE SPREAD OF THE INCREASE RESOLVE THE MATTER OF CUSTOMER IMPACTS DUE TO THE PROPOSED RATE CONSOLIDATION?

A No. There are significant changes in the design of the rates and many examples of sharp and extraordinary individual customer impacts. Schedule 1 is a copy of customer impact data provided by GMO during the workshops. It is marked with notes. I also marked the numbers of customers that would experience increases of 20% or more under the proposed rates. The problem arises on many of the rate schedules. In total, under the GMO analysis there are several thousand customers with impacts above 20%. GMO provided further analysis and explanation, but significant impacts remain.

Q HAVE ALTERNATIVE RATE POSSIBILITIES BEEN CONSIDERED AS A PART OF THE WORKSHOP PROCESS?

A Yes. However, at this time there is no consensus among parties as to appropriate rates.

Q WHAT DO YOU RECOMMEND?

A There are at this time three possibilities. I recommend consideration of two of the three.

First, I expect Parties to move from the workshop discussions of the proposed consolidated rate design to discussions of settlement possibilities. Hence, one possibility may be a settlement supported by OPC. I would of course recommend due consideration of any settlement that may emerge.

Second, in the absence of an agreed structure and rates, I would recommend the Commission consider an equal percentage adjustment of existing rates to the extent needed to accommodate any change in the revenue requirement (as determined by the Public Service Commission or "Commission" in due course). This is embodied in the unconsolidated rates filed by GMO.

Third, the possibility of the proposed consolidated rates remains. However, the impacts of the proposed consolidated rates on customers are in many cases sharp and extraordinary. I do not recommend approval of the GMO proposed consolidated rates.

Q IS IT A SIMPLE MATTER TO DESIGN RATES WHICH MINIMIZE POTENTIALLY DISPARATE IMPACTS ON CUSTOMERS?

A No. Indeed, based on my participation in the workshops, it is fair to say minimization of the impacts in this case is difficult and in any event will require trade-offs. In fact, the impacts on individual customers necessarily depend upon a great deal of analysis. Also, efforts to minimize the individual customer impacts can easily be lost in summaries and averages.

Q **DO YOU RECOMMEND MITIGATION OF SHARP AND EXTRAORDINARY IMPACTS?**

A Yes. This possibility is raised in the MECG/MIEC direct testimony and some form of mitigation should be pursued as a part of any rate consolidation.

Q **DID MECG/MIEC PROVIDE SPECIFIC MITIGATION PROPOSALS?**

A Yes. The proposals focus on relief for large customers by adjusting demand rates and the Annual Base Demand definition.

Q **WHAT IS YOUR RESPONSE TO THE PROPOSAL?**

A It identifies sources of some of the extraordinary impacts on large customers. It does not address the impact on smaller customers.

Q **WHAT DO YOU OFFER IN RESPONSE?**

A For mitigation in this case I recommend a target maximum annual increase for individual customers of 16.4% for the first year that restructured rates are in effect. This is two times the proposed overall increase.

Q **PLEASE EXPLAIN YOUR MITIGATION RECOMMENDATION**

A For customers on demand rates, a demand credit mechanism is appropriate. For others a credit per kWh is recommended.

Q **WHAT IS THE LEVEL OF CREDIT YOU RECOMMEND?**

A There are many exigencies to be considered and, to date, I am aware of no rate proposal that would result in satisfactory customer impacts in every circumstance.

Consequently, I believe it is necessary to provide for limited GMO discretion in the application of credits for the first year under consolidated rates.

Q PLEASE DESCRIBE THE RECOMMENDED TARIFF LANGUAGE AND EXPLAIN HOW IT COULD BE APPLIED.

A The recommended language is as follows for demand rates:

> GMO shall have the discretion to provide demand rate credits determined for individual customers to reduce the impact of the rate change to approximately 16.4% on an annual basis for a period of one year. GMO shall consider the impact on a combined basis for any customer that takes service at multiple locations or under multiple rates. This authority to provide demand rate credits shall expire 12 months after the initial effective date of this rate. A rate credit established during this period either may be applied retroactively to the first effective date of this rate, or it may be applied prospectively, but in no event shall the effective period of the rate credit for any customer be greater than 12 months.

The language I recommend for non-demand rates is as follows:

> GMO shall have the discretion to provide kWh based rate credits determined for individual customers to reduce the impact of the rate change to approximately 16.4% on an annual basis for a period of one year. GMO shall consider the impact on a combined basis for any customer that takes service at multiple locations or under multiple rates. This authority to provide kWh based rate credits shall expire 12 months after the initial effective date of this rate. A rate credit established during this period either may be applied retroactively to the first effective date of this rate, or it may be applied prospectively, but in no event shall the effective period of the kWh rate credit for any customer be greater than 12 months.

Q **HOW SHOULD THE FORGONE REVENUES BE TREATED?**

A I recommend consideration of alternative approaches, depending on the impact on GMO.

First, assuming an overall impact of the mitigation that would not deny GMO the opportunity for a fair return on equity, the impact should not be recoverable. This is a simple solution and GMO would have a vested interested in providing relief only in cases where the magnitude of the impact, in its reasonable discretion, is worthy of mitigation.

Second, if shown to be necessary to provide the opportunity for a fair return, GMO could be authorized to maintain a record of the relief provided and seek recovery in a future rate case.

Q **IS THERE ANY REASON FOR GMO TO BEAR RESPONSIBILITY FOR THE COST OF MITIGATION?**

A Yes. One important consideration is the timing of notice that was provided. As GMO explained in the workshops, it did not initially send notice of the possibility of extraordinary impacts that result from its proposed consolidated rates because it did not want to do so before it had sufficient reason to believe consolidated rates would be approved. The consequence of the Company's decision is that notice was delayed and sent only recently.

Q **IS THE DELAY OF NOTICE OF IMPORTANCE IN THE CONTEXT OF THE PROPOSED CONSOLIDATED RATES?**

A Yes. The rate impacts vary substantially based on seasonal demands and based on annual maximum demands. Customers have had no timely notice with respect to summer 2016 or the future impact of recent past consumption, and to that extent it has been impossible for customers to prepare for the new rates with adjustments to consumption or even to attempt to budget for any extraordinary increases. Thus, while GMO chose to delay providing notice, the delay unavoidably exacerbates an already difficult situation.

ALLOCATION OF GREENWOOD SOLAR PROJECT COSTS

Q **DOES OPC AGREE THAT GMO CUSTOMERS SHOULD PAY FOR THE COST OF THE GREENWOOD SOLAR PROJECT?**

A No. The matter is under appeal from Docket EA-2016-0256, and while this testimony will address possible rate treatment of the Greenwood Solar Project costs, OPC fully reserves its right to pursue appeals of the Commission's decision in Docket EA-2015-0256 that led to these costs. Any and all related matters, including but not limited to the tracking of revenues collected based on such costs, are also fully reserved.

Q **HAS STAFF PROPOSED A KWH BASED ALLOCATION OF GREENWOOD SOLAR PROJECT COSTS BETWEEN KCPL AND GMO?**

A Yes. The Commission's Report and Order in EA-2015-0256 cites a likely future need to reduce kWh from coal generation as important to its rationale for approval of the project. Beyond that, the Report and Order also cites a Company objective to obtain

operational experience for both GMO and KCPL. Another consideration is that the project will not be connected to the transmission system and it will not be dispatchable capacity in the Southwest Power Pool.

It is the perceived future need to offset coal fired generation that is the primary driver of this cost. As such, energy is the appropriate factor for the allocation of these costs.

Q IF GMO IS ABLE TO INCLUDE THESE COSTS IN RATES, WHAT SHOULD BE ALLOCATED BETWEEN GMO AND KCPL?

A As a hypothetical, it should be the net cost of project, which I would define as the total annual fixed cost of the project less the energy cost avoided due to the generation. The value of the solar RECs should be credited also if and when they have value to GMO.

Q DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?

A Yes it does.

Appendix A
Qualifications of Donald E. Johnstone

Q PLEASE STATE YOUR NAME AND ADDRESS.

A Donald E. Johnstone. My business address is 384 Black Hawk Drive, Lake Ozark, MO 65049.

Q PLEASE STATE YOUR OCCUPATION.

A I am President of Competitive Energy Dynamics, L. L. C. and a consultant in the field of public utility regulation.

Q PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A In 1968, I received a Bachelor of Science Degree in Electrical Engineering from the University of Missouri at Rolla. After graduation, I worked in the customer engineering division of a computer manufacturer. From 1969 to 1973, I was an officer in the Air Force, where most of my work was related to the Aircraft Structural Integrity Program in the areas of data processing, data base design and economic cost analysis. Also in 1973, I received a Master of Business Administration Degree from Oklahoma City University.

From 1973 through 1981, I was employed by a large Midwestern utility and worked in the Power Operations and Corporate Planning Functions. While in the Power Operations Function, I had assignments relating to the peak demand and net output forecasts and load behavior studies which included such factors as weather, conservation and seasonality. I also analyzed the cost of replacement energy associated with forced outages of generation facilities. In the Corporate Planning

Function, my assignments included developmental work on a generation expansion planning program and work on the peak demand and sales forecasts. From 1977 through 1981, I was Supervisor of the Load Forecasting Group where my responsibilities included the Company's sales and peak demand forecasts and the weather normalization of sales.

In 1981, I began consulting, and in 2000, I created the firm Competitive Energy Dynamics, L.L.C. As a part of my thirty-five years of consulting practice, I have participated in the analysis of various electric, gas, water, and sewer utility matters, including the analysis and preparation of cost-of-service studies and rate analyses. In addition to general rate cases, I have participated in electric fuel and gas cost reviews and planning proceedings, policy proceedings, market price surveys, generation capacity evaluations, and assorted matters related to the restructuring of the electric and gas industries. I have also assisted companies in the negotiation of power contracts representing over $1 billion of electricity.

I have testified before the state regulatory commissions of Delaware, Hawaii, Illinois, Iowa, Kansas, Massachusetts, Missouri, Montana, New Hampshire, Ohio, Pennsylvania, Tennessee, Virginia and West Virginia, and the Rate Commission of the Metropolitan St. Louis Sewer District.

Impact Summaries

Best Fit Impact Summary – Large Power

Secondary Large Power

Primary Large Power

Large Power Service Class				
Impact	Previous Rate			
	MO730	MO944	MO735	MO945
<-50%	0	0	0	0
-50% to -40%	0	0	0	0
-40% to -30%	0	0	0	0
-30% to -20%	1	0	0	0
-20% to -10%	0	1	1	0
-10% to 0%	4	6	0	0
0% to 10%	88	56	15	8
10% to 20%	46	1	24	0
20% to 30%	0	0	0	0
30% to 40%	0	0	0	0
40% to 50%	0	0	0	0
>50%	0	0	0	0
Ave %	8.28%	3.78%	10.63%	3.08%
Total	139	64	40	8

Min

Impact Information Received from GMO on May 19, 2016

Best Fit Impact Summary – Large Power

Large Power Service Class				
Impact	Previous Rate			
	MO732	MO939	MO946	MO947
<-50%	0	0	0	0
-50% to -40%	0	0	0	0
-40% to -30%	0	0	0	0
-30% to -20%	0	0	0	0
-20% to -10%	0	0	0	1
-10% to 0%	0	2	2	4
0% to 10%	1	0	0	0
10% to 20%	2	0	0	0
20% to 30%	0	0	0	0
30% to 40%	0	0	0	0
40% to 50%	0	0	0	0
>50%	0	0	0	0
Ave %	9.53%	-4.79%	-6.58%	-8.45%
Total	3	2	2	5

Best Fit Impact Summary – Large General

Large General Service Class						
Impact	Previous Rate					
	MO720	MO940	MO725	MO938	MO722	MO942**
<-50%	12	19	0	0	0	4
-50% to -40%	5	14	0	0	0	1
-40% to -30%	4	19	0	0	0	4
-30% to -20%	10	38	0	0	0	6
-20% to -10%	23	116	1	0	1	10
-10% to 0%	45	315	1	8	2	32
0% to 10%	667	474	3	0	51	45
10% to 20%	616	124	12	0	56	10
20% to 30%	67	0	6	0	1	0
30% to 40%	10	0	1	0	0	0
40% to 50%	3	0	0	0	0	0
>50%	(4)	0	(1)	0	0	0
Ave %	9.40%	-2.34%	20.35%	-4.47%	10.37%	-5.06%
Total	1466	1119	25	8	111	112

Over 20%	84
Over 50%	4

8
1

**Best fit data for MO942 has been corrected since the direct filing. Corrected work papers will be included with the case update.

Average per customer increase

Best Fit Impact Summary – Large General

Large General Service - Select Detailed View						
Impact	Previous Rate					
	MO720		MO940		MO942**	
	Count	Ave. Annual $	Count	Ave. Annual $	Count	Ave. Annual $
<-50%	12	$ (1,230.40)	19	$ (1,626.46)	4	$ (1,639.95)
-50% to -45%	2	$ (1,903.64)	5	$ (1,297.18)	0	$ -
-45% to 40%	3	$ (1,729.44)	9	$ (1,522.68)	1	$ (365.30)
-40% to -35%	1	$ (3,123.74)	11	$ (1,302.84)	1	$ (1,679.00)
-35% to -30%	3	$ (2,664.15)	8	$ (1,497.65)	3	$ (1,255.55)
-30% to -25%	4	$ (1,982.31)	15	$ (964.23)	1	$ (85.74)
-25% to -20%	6	$ (1,663.35)	23	$ (1,214.44)	5	$ (1,357.44)
-20% to -15%	8	$ (1,321.12)	36	$ (1,691.38)	5	$ (1,158.68)
-15% to -10%	15	$ (1,210.74)	80	$ (1,087.92)	5	$ (909.81)
-10% to -5%	10	$ (625.77)	113	$ (1,224.75)	9	$ (1,723.01)
-5% to 0%	35	$ (306.14)	202	$ (836.71)	23	$ (437.14)
0% to 5%	88	$ 1,403.35	280	$ 809.42	34	$ 1,104.81
5% to 10%	579	$ 4,099.12	194	$ 1,354.09	11	$ 1,520.23
10% to 15%	421	$ 5,532.89	109	$ 2,221.75	10	$ 2,726.47
15% to 20%	195	$ 6,836.22	15	$ 2,855.95	0	$ -
20% to 25%	45	$ 9,101.27	0	$ -	0	$ -
25% to 30%	22	$ 6,366.01	0	$ -	0	$ -
30% to 35%	6	$ 14,845.35	0	$ -	0	$ -
35% to 40%	4	$ 9,319.15	0	$ -	0	$ -
40% to 45%	0	$ -	0	$ -	0	$ -
45% to 50%	3	$ 20,743.82	0	$ -	0	$ -
>50%	4	$ 17,348.75	0	$ -	0	$ -
Ave %	9.40%		-2.34%		-5.06%	
Total	1466	$ 4,685.13	1119	$ 178.02	112	$ 235.74

Over 20% 87

Impact Information Received from GMO on May 19, 2016

Proposed SGS Non-Demand and Demand Rates

- Designed to accommodate small customers are more like Residential than C&I.
- Provide mechanism to change rates as customers grow.

MAXIMUM MONTHLY USAGE

When energy usage of the customer exceeds five thousand four hundred (5,400) kWh per month in two (2) billing periods out of the most recent twelve (12) billing periods, or Company has reason to believe that the customer's demand exceeds thirty (30) kW regardless of the energy usage, Company shall install a demand meter.

- Proposed ***Availability*** terms

SERVICE WITHOUT DEMAND METER:
The Service without Demand Meter rate (rate codes MOSGS or MOSNS) is available for general service to any non-residential customer whose monthly usage is no more than 5,400 kWh in two (2) billing periods out of the most recent twelve (12) billing periods.

SERVICE WITH DEMAND METER:
The Service with Demand Meter rate (rate codes MOSDS, MOSND, or MOSGP) is available for all general service use, such as combined lighting and power service to any non-residential customer who shall contract for a minimum capacity of twenty-five (25) kilowatts (kW).

Best Fit Impact Summary – Small General

Small General Service - Demand				
Impact	Previous Rate			
	MOSDS / MO711		MOSDS / MO931	
	Count	Ave. Annual $	Count	Ave. Annual $
<-50%	3	$ (8,616.86)	6	$ (8,752.52)
-50% to -45%	3	$ (3,769.08)	2	$ (7,658.91)
-45% to 40%	5	$ (3,569.78)	5	$ (3,836.15)
-40% to -35%	8	$ (3,502.73)	2	$ (4,149.19)
-35% to -30%	8	$ (2,890.52)	12	$ (3,510.13)
-30% to -25%	9	$ (2,116.23)	20	$ (2,373.57)
-25% to -20%	19	$ (1,900.49)	28	$ (2,013.49)
-20% to -15%	45	$ (1,283.77)	42	$ (1,839.33)
-15% to -10%	88	$ (1,021.07)	39	$ (1,564.29)
-10% to -5%	152	$ (930.67)	75	$ (730.70)
-5% to 0%	254	$ (355.63)	23	$ (288.81)
0% to 5%	348	$ 370.29	3	$ 53.78
5% to 10%	567	$ 810.58	0	$ -
10% to 15%	451	$ 1,142.26	0	$ -
15% to 20%	142	$ 1,068.66	0	$ -
20% to 25%	57	$ 1,069.72	0	$ -
25% to 30%	24	$ 1,596.83	0	$ -
30% to 35%	25	$ 1,881.86	0	$ -
35% to 40%	11	$ 2,318.31	0	$ -
40% to 45%	6	$ 3,435.05	0	$ -
45% to 50%	4	$ 3,422.01	0	$ -
>50%	10	$ 5,885.74	0	$ -
Ave %	5.48%		-16.18%	
Total	2239	$ 437.54	257	$ (1,715.28)

Over 20% 137

Impact Information Received from GMO on May 19, 2016

Best Fit Impact Summary – Small General

Small General Service - No Demand				
Impact	Previous Rate			
	MOSGS / MO711		MOSGS / MO931	
	Count	Ave. Annual $	Count	Ave. Annual $
<-50%	70	$ (1,202.67)	50	$ (2,001.08)
-50% to -45%	15	$ (906.51)	10	$ (1,031.94)
-45% to 40%	14	$ (929.03)	19	$ (1,371.05)
-40% to -35%	31	$ (510.69)	72	$ (565.57)
-35% to -30%	45	$ (640.47)	98	$ (379.98)
-30% to -25%	34	$ (484.65)	93	$ (380.05)
-25% to -20%	75	$ (297.67)	86	$ (355.96)
-20% to -15%	103	$ (266.43)	122	$ (299.05)
-15% to -10%	175	$ (159.61)	146	$ (225.59)
-10% to -5%	250	$ (97.83)	214	$ (145.74)
-5% to 0%	386	$ (30.28)	220	$ (45.15)
0% to 5%	610	$ 38.39	193	$ 50.22
5% to 10%	968	$ 105.39	117	$ 142.66
10% to 15%	1382	$ 173.88	46	$ 186.57
15% to 20%	1585	$ 233.93	4	$ 123.12
20% to 25%	1636	$ 283.31	2	$ 47.68
25% to 30%	1310	$ 290.94	0	$ -
30% to 35%	1123	$ 255.08	0	$ -
35% to 40%	1200	$ 266.32	0	$ -
40% to 45%	1084	$ 227.86	0	$ -
45% to 50%	655	$ 189.52	0	$ -
>50%	1525	$ 166.74	0	$ -
Ave %	24.94%		-12.51%	
Total	14276	$ 177.00	1492	$ (238.16)

kva is common transformer and basis for the break

Over 20% 8533

Impact Information Received from GMO on May 19, 2016

Best Fit Impact Summary – Residential

Residential Service Class - General Service				
Impact	Previous Rate			
	MO910		MO860	
	Count	Ave. Annual $	Count	Ave. Annual $
<0%	10	$ (7.09)	582	$ (1.13)
0% to 5%	1145	$ 69.31	8061	$ 27.41
5% to 10%	25209	$ 102.96	116038	$ 103.74
10% to 15%	9261	$ 57.02	21241	$ 56.83
15% to 20%	2882	$ 35.25	11851	$ 35.39
20% to 25%	1377	$ 31.14	7699	$ 19.47
25% to 30%	949	$ 28.88	2825	$ 18.68
30% to 35%	616	$ 29.36	1467	$ 22.24
35% to 40%	465	$ 30.95	2313	$ 32.58
40% to 45%	314	$ 37.54	1	$ 45.88
45% to 50%	350	$ 39.30	0	$ -
>50%	808	$ 44.28	0	$ -
Ave %	12.51%		10.54%	
Total	43386	$ 79.95	172078	$ 82.49

Over 20% 4879

Over 20% 14,305

Impact Information Received from GMO on May 19, 2016

Best Fit Impact Summary – Residential

Residential Service Class - Space Heating				
Impact	Previous Rate			
	MO920		MO870	
	Count	Ave. Annual $	Count	Ave. Annual $
<0%	480	$ (36.10)	571	$ (0.76)
0% to 5%	5174	$ 69.95	3365	$ 10.76
5% to 10%	7008	$ 114.39	74682	$ 126.74
10% to 15%	6235	$ 100.08	10714	$ 92.22
15% to 20%	4073	$ 80.37	5445	$ 31.86
20% to 25%	1697	$ 52.88	4124	$ 15.46
25% to 30%	804	$ 27.79	1187	$ 11.54
30% to 35%	394	$ 26.30	390	$ 15.82
35% to 40%	224	$ 27.20	469	$ 24.58
40% to 45%	84	$ 26.58	0	$ -
45% to 50%	66	$ 33.44	0	$ -
>50%	144	$ 41.32	0	$ -
Ave %	11.71%		10.11%	
Total	26383	$ 84.77	100947	$ 106.57

Over 20% 3413

Impact Information Received from GMO on May 19, 2016