Exhibit No.:
Issues: Standby Service Rider
Witness: Barbara J. Meyer
Sponsoring Party: Missouri Department of Economic Development – Division of Energy
Type of Exhibit: Surrebuttal Testimony
Case Nos.: ER-2018-0145
ER-2018-0146

MISSOURI PUBLIC SERVICE COMMISSION

KANSAS CITY POWER & LIGHT COMPANY

KCP&L GREATER MISSOURI OPERATIONS COMPANY

CASE NOs. ER-2018-0145 and ER-2018-0146

SURREBUTTAL TESTIMONY

OF

BARBARA J. MEYER

ON

BEHALF OF

MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT

DVISION OF ENERGY

Jefferson City, Missouri
September 4, 2018

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	)))	**File No. ER-2018-0145**
In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority To Implement a General Rate Increase for Electric Service	))))	**File No. ER-2018-0146**

AFFIDAVIT OF BARBARA J. MEYER

STATE OF MISSOURI)
) **ss**
COUNTY OF COLE)

Barbara J. Meyer, of lawful age, being duly sworn on her oath, deposes and states:

1. My name is Barbara J. Meyer. I work in the City of Jefferson, Missouri, and I am employed by the Missouri Department of Economic Development as an Energy Engineer, Division of Energy.
2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of the Missouri Department of Economic Development – Division of Energy.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge.

Barbara J. Meyer

Subscribed and sworn to before me this 4th date of September, 2018.

Notary Public

My commission expires: 4/26/20

LAURIE ANN ARNOLD
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: April 26, 2020
Commission Number: 16808714

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I. INTRODUCTION AND PURPOSE OF TESTIMONY

Q. Please state your name and business address.

A. My name is Barbara J. Meyer. My business address is 301 West High Street, Suite 720, PO Box 1766, Jefferson City, Missouri 65102.

Q. By whom and in what capacity are you employed?

A. I am employed by the Missouri Department of Economic Development, Division of Energy ("DE") as an Energy Engineer.

Q. Have you previously filed testimony before the Missouri Public Service Commission ("Commission")?

A. No.

Q. Please describe your educational background and employment service.

A. I received both Bachelor of Science and Master of Science degrees in Mechanical Engineering from the University of Missouri in Columbia and am registered as a Professional Engineer in Missouri. I have over 20 years of experience in the energy industry working for a variety of firms including electric utilities, engineering consultants, and original equipment manufacturers, and I have direct experience in the design of combined heat and power ("CHP") systems. I began work for DE in 2014. I led DE's participation in the U.S. Department of Energy's Combined Heat and Power for Resiliency Accelerator, participated in the year-long Standby Service Rider ("SSR") collaborative workshop initiated by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") pursuant to the Non-Unanimous Stipulation and Agreement in Case

No. ER-2014-0258, and provided technical analysis of SSRs in support of DE's recommendations.

Q. What is the purpose of your Surrebuttal Testimony?

A. The purpose of my Surrebuttal Testimony is to present the approach used by DE to resolve our concerns with the SSR proposed by Kansas City Power & Light Company ("KCP&L") and KCP&L Greater Missouri Operations Company ("GMO") (collectively, "Companies") and to recommend adoption of the alternative rates and structure provided herein, in combination with the alternative definitions recommended in DE witness Ms. Jane E. Epperson's Surrebuttal Testimony.

Q. What information did you review in preparing this testimony?

A. In preparation for this testimony, I reviewed the proposed rates filed by KCPL.

II. PROPOSED SSR METHOLODGY

Q. Please explain the approach that you used to resolve the deficiencies described in Ms. Epperson's Rebuttal Testimony[1] regarding the Companies' proposed SSR.

A. The solutions to these deficiencies were previously developed in a collaborative effort with Ameren Missouri, which subsequently applied the revised SSR in its territory. I applied these solutions in the KCP&L contexts to produce alternative SSR rates, with modifications to account for KCP&L's generally available rate

[1] Rebuttal testimony, Jane E. Epperson, ER-2018-0145/0146. P 7-8.

designs. DE recommends the adoption of the rates detailed in Tables 1-8, as well as the development of similar rates for GMO.

Q. Why is this method reasonable?

A. My methodology is linked to the otherwise applicable class rates, distributes charges in a manner that mirrors seasonal costs, and creates a financial incentive for SSR customers to avoid unplanned usage during peak periods and to encourage maintenance to occur during off-peak periods. The same reasoning was used in the collaboration to develop the Ameren SSR and the approach used described in this testimony mirrors the methodology of the Ameren SSR.

Q. Please explain how the values in Tables 1-8 were derived.

A. I utilized the methodology to calculate the reservation charge for over 2 MW of standby capacity in the Companies' proposed SSR and reapportioned that charge into the fixed generation and transmission access charge and the summer seasonal facilities charge. I then applied the methodology developed in the SSR workshop to arrive at the remaining SSR rates to achieve a balance between fixed and variable charges. For example, in Table 1:

- The SSR summer facilities charge (Cell C10 = $0.530) is one-eighth of the Medium General Service ("MGS") summer demand charge (Cell B19 = $4.243 divided by eight).
- The SSR winter facilities charge (Cell C11 = $0.270) is one-eighth of the MGS winter demand charge (Cell B20 = $2.159 divided by eight).

- The SSR generation and transmission ("G&T") access charge (Cell C12 = $0.530) is one-eighth of the MGS summer demand charge (Cell B19 = $4.243 divided by eight).
- The SSR summer daily back-up demand charge (Cell C16 = $0.428) is double the summer daily maintenance demand charge (Cell C17 = $0.214).
- The SSR summer daily maintenance demand charge (Cell C17 = $0.214) is the MGS facilities charge (Cell D9 = $3.243) plus the MGS summer demand charge (Cell B19 = $4.243) minus the summer facilities charge (C10 = $0.530) and the G&T access charge (Cell C12 = $0.530), with the resulting value divided by 30 (the number of days in a month).
- The SSR winter daily back-up demand charge (Cell C20 = $0.342) is double the winter daily maintenance charge (Cell C21 = $0.171).
- The SSR winter daily maintenance demand charge (Cell C21 = $0.171) is the MGS facilities charge (Cell D9 = $3.243) plus the MGS winter demand charge (Cell B20 = $2.159) minus the winter facilities charge (Cell C11 - $0.270) and the G&T access charge (Cell C12 = $0.530), with the resulting value divided by 30 days.
- The SSR summer back-up energy charge (Cell C24 = $0.1190) equals the highest summer block rate (Cell B24).
- The SSR winter back-up energy charge (Cell C29 = $0.09548) equals the highest winter block rate (Cell B29).

Q. Should the SSR rates shown in Tables 1 - 8 be adjusted based upon the Commission's approved class rates?

A. Yes. The SSR rates shown in Tables 1 – 8 are based on the Company's proposed rates filed in this case. All calculated SSR rates will need to be updated to reflect the Commission's Order in the case.

Q. What rate schedule should apply to SGS customers generating a portion of their energy requirements?

A. The customer should be charged exclusively under the SGS rate schedule.

Q. Did you also modify the Ameren Missouri SSR Study Tool to reflect KCP&L's Large General Service ("LGS") secondary voltage rate structure?

A. Yes, I modified the Ameren Missouri SSR Study Tool for Small Primary Service ("SPS") to reflect KCPL's LGS secondary voltage class. I used the modified tool to study the billing impact of the alternative SSR definitions and structure recommended in the Surrebuttal Testimony of Ms. Epperson and the alternative rates presented in Table 3. The study used the load and generation profiles studied for the Ameren Missouri SPS class during the workshop. The study tool developed during the workshop was later enhanced for use as a customer-enabled tool configured for 15-minute interval meter data; I modified this aspect of the tool to reflect the fact that KCP&L's LGS secondary voltage customers are billed based on 30-minute intervals.

Q. Is it reasonable, within the timeframe of this rate case, for the Companies to modify the Ameren Missouri SSR Study Tool for the remaining applicable classes, thus producing KCP&L and GMO SSR Study Tools to facilitate customer understanding of the bill impacts of the SSR?

A. Yes. I've provided a spreadsheet that the Companies can use to model SSR study tools for applicable classes.

Q. Please further explain the approach used to modify the Ameren Missouri SSR Study Tool to reflect the companies' rate design structure for LGS secondary voltage customers.

A. The approach comprised multiple steps. I first retrieved calendar year 2014 load and generation hourly data from the Ameren Missouri SPS study file used during the workshop and converted it to equivalent 15-minute data using a converter tool available from Ameren Missouri for that purpose. The 15 minute data was input into the calendar year 2017 Ameren SSR Study Tool template for SPS. The generation profile was modified to reflect the outage schedule used in the workshop. Table 9 summarizes the outage profile. This file serves as a 15-minute "baseline file." Next, a copy of the baseline file was modified to reflect 30-minute interval meter data per KCP&L's demand billing basis, the addition of monthly facilities charges, the rates in Table 3, and other changes reflective of KCPL's structure, such as invalidation of the high-voltage discount feature of the tool. The results of the 30-minute file were compared to the results of the 15-minute file to validate the accuracy of the modification.

Q. What were the results of the study for the KCP&L LGS secondary voltage class?

A. The study indicates that the alternative rates achieve an avoided cost percentage of at least 90 percent (92 percent). Table 10 summarizes the results of the 30-minute study file.

Q. Should the Companies adapt the Study Tool to reflect their other classes?

A. Yes. I also recommend that the Companies publish the tool on their website.

III. RECOMMENDATIONS

Q. What are your recommendations for the Commission?

A. I recommend the Commission direct the companies to:

a) Adopt the methodology illustrated in Tables 1-8, in combination with the alternative definitions recommended in Attachment 2 of Ms. Epperson's Surrebuttal Testimony.

c) Adopt the draft SSR Study Tool, as modified to reflect KCP&L's rate design for Large General Service, Secondary Voltage.

d) Perform similar modification of the draft KCP&L SSR Study Tool to reflect the Companies' other customer service classes applicable to the SSR. Additionally, the Companies should make these tools available on their website.

Q. Does this conclude your testimony?

A. Yes.

Table 1. Medium General Service, Secondary Voltage

	KCP&L Propsosed Rate		DE Proposed KCP&L SSR	
	MGS Secondary Voltage Service		MGS Secondary Voltage Service	
	A	B	C	D
1	Minimum demand, kW	25	25	Minimum Supplemental Contract Capacity, kW
2			Standby Fixed Charges	
3	Customer charge, $			
4	0 - 24 kW	$55.82	$110.00	Administrative Charge
5	25 - 199 kW	$55.82		
6	200 - 999 kW	$113.35		
7	1000 kW or more	$967.90		
8				
9	Facilities Charge, $/kW*	$3.243		Facilities Charge per month per kW of Contracted Standby Capacity
10			$0.530	Summer
11			$0.270	Winter
12			$0.530	Generation and Transmission Access Charge per month per kW of Contracted Standby Capacity
13				
14				
15	Demand Charge, $/kW		Daily Standby Demand Rate - Summer	
16			$0.428	Back-Up
17			$0.214	Maintenance
18				
19	Summer	$4.243	Daily Standby Demand Rate - Winter	
20	Winter	$2.159	$0.342	Back-Up
21			$0.171	Maintenance
22				
23	Summer Energy charge, $/kWh		Back-Up Energy Charges - Summer	
24	block 1 - first 180 hours use	$0.11090	$0.11090	kWh in excess of Supplemental Contract Capacity
25	block 2 - second 180 hours use	$0.07586		
26	block 3 - over 360 hours use	$0.06398		
27				
28	Winter Energy charge, $/kWh		Back-Up Energy Charges - Winter	
29	block 1 - first 180 hours use	$0.09584	$0.09584	kWh in excess of Supplemental Contract Capacity
30	block 2 - second 180 hours use	$0.05735		
31	block 3 - over 360 hours use	$0.04810		

*SSR customers are billed monthly facilities charges calculated as the per kW facilities charge multiplied by the Supplemental Contract Capacity.

Table 2. Medium General Service, Primary Voltage

	KCP&L Propsosed Rate		DE Proposed KCP&L SSR	
	MGS Primary Voltage Service		MGS Primary Voltage Service	
	A	B	C	D
1	Minimum demand, kW	25	25	Minimum Supplemental Contract Capacity, kW
2			Standby Fixed Charges	
3	Customer charge, $			
4	0 - 24 kW	$55.82	$110.00	Administrative Charge
5	25 - 199 kW	$55.82		
6	200 - 999 kW	$113.35		
7	1000 kW or more	$967.90		
8				
9	Facilities Charge, $/kW*	$2.688		Facilities Charge per month per kW of Contracted Standby Capacity
10			$0.518	Summer
11			$0.263	Winter
12			$0.518	Generation and Transmission Access Charge per month per kW of Contracted Standby Capacity
13				
14				
15	Demand Charge, $/kW		Daily Standby Demand Rate - Summer	
16			$0.386	Back-Up
17			$0.193	Maintenance
18				
19	Summer	$4.144	Daily Standby Demand Rate - Winter	
20	Winter	$2.107	$0.302	Back-Up
21			$0.151	Maintenance
22				
23	Summer Energy charge, $/kWh		Back-Up Energy Charges - Summer	
24	block 1 - first 180 hours use	$0.10825	$0.10825	kWh in excess of Supplemental Contract Capacity
25	block 2 - second 180 hours use	$0.07415		
26	block 3 - over 360 hours use	$0.06251		
27				
28	Winter Energy charge, $/kWh		Back-Up Energy Charges - Winter	
29	block 1 - first 180 hours use	$0.09358	$0.09358	kWh in excess of Supplemental Contract Capacity
30	block 2 - second 180 hours use	$0.05603		
31	block 3 - over 360 hours use	$0.04719		

*SSR customers are billed monthly facilities charges calculated as the per kW facilities charge multiplied by the Supplemental Contract Capacity.

TABLE 3. Large General Service, Secondary Voltage

	KCP&L Propsosed Rate			DE Proposed KCP&L SSR	
	LGS Secondary Voltage Service			LGS Secondary Voltage Service	
	A	B		C	D
1	Minimum demand, kW	200		200	Minimum Supplemental Contract Capacity, kW
2				**Standby Fixed Charges**	
3	**Customer charge, $**				
4	0 - 24 kW	$120.11		$130.00	**Administrative Charge**
5	25 - 199 kW	$120.11			
6	200 - 999 kW	$120.11			
7	1000 kW or more	$1,025.43			
8					
9	**Facilities Charge, $/kW***	$3.436			**Facilities Charge per month per kW of Contracted Standby Capacity**
10				$0.858	Summer
11				$0.462	Winter
12				$0.858	**Generation and Transmission Access Charge per month per kW of Contracted Standby Capacity**
13					
14					
15	**Demand Charge, $/kW**			**Daily Standby Demand Rate - Summer**	
16				$0.572	Back-Up
17				$0.286	Maintenance
18					
19	Summer	$6.862		**Daily Standby Demand Rate - Winter**	
20	Winter	$3.692		$0.444	Back-Up
21				$0.222	Maintenance
22					
23	**Summer Energy charge, $/kWh**			**Back-Up Energy Charges - Summer**	
24	block 1 - first 180 hours use	$0.10077		$0.10077	kWh in excess of Supplemental Contract Capacity
25	block 2 - second 180 hours use	$0.06922			
26	block 3 - over 360 hours use	$0.04473			
27					
28	**Winter Energy charge, $/kWh**			**Back-Up Energy Charges - Winter**	
29	block 1 - first 180 hours use	$0.09259		$0.09259	kWh in excess of Supplemental Contract Capacity
30	block 2 - second 180 hours use	$0.05321			
31	block 3 - over 360 hours use	$0.03759			

*SSR customers are billed monthly facilities charges calculated as the per kW facilities charge multiplied by the Supplemental Contract Capacity.

TABLE 4. Large General Service, Primary Voltage

	KCP&L Propsosed Rate		DE Proposed KCP&L SSR	
	LGS Primary Voltage Service		LGS Primary Voltage Service	
	A	B	C	D
1	minimum demand, kW	200	200	Minimum Supplemental Contract Capacity, kW
2			**Standby Fixed Charges**	
3	**Customer charge, $**			
4	0 - 24 kW	$120.11	$130.00	**Administrative Charge**
5	25 - 199 kW	$120.11		
6	200 - 999 kW	$120.11		
7	1000 kW or more	$1,025.43		
8				
9	**Facilities Charge, $/kW***	$2.849		**Facilities Charge per month per kW of Contracted Standby Capacity**
10			$0.838	Summer
11			$0.451	Winter
12			$0.838	**Generation and Transmission Access Charge per month per kW of Contracted Standby Capacity**
13				
14				
15	**Demand Charge, $/kW**		**Daily Standby Demand Rate - Summer**	
16			$0.525	Back-Up
17			$0.263	Maintenance
18				
19	Summer	$6.706	**Daily Standby Demand Rate - Winter**	
20	Winter	$3.608	$0.400	Back-Up
21			$0.200	Maintenance
22				
23	**Summer Energy charge, $/kWh**		**Back-Up Energy Charges - Summer**	
24	block 1 - first 180 hours use	$0.09851	$0.09851	kWh in excess of Supplemental Contract Capacity
25	block 2 - second 180 hours use	$0.06757		
26	block 3 - over 360 hours use	$0.04368		
27				
28	**Winter Energy charge, $/kWh**		**Back-Up Energy Charges - Winter**	
29	block 1 - first 180 hours use	$0.09048	$0.09048	kWh in excess of Supplemental Contract Capacity
30	block 2 - second 180 hours use	$0.05194		
31	block 3 - over 360 hours use	$0.03686		

*SSR customers are billed monthly facilities charges calculated as the per kW facilities charge multiplied by the Supplemental Contract Capacity.

TABLE 5. Large Primary Service, Secondary Voltage

	KCP&L Propsosed Rate		DE Proposed KCP&L SSR	
	LPS Secondary Voltage Service		LPS Secondary Voltage Service	
	A	B	C	D
1	Minimum demand, kW	1000	1000	Minimum Supplemental Contract Capacity, kW
2			Standby Fixed Charges	
3	Customer charge, $	$1,160.53		
4			$430.00	Administrative Charge
5				
6	Facilities Charge, $/kW*	$3.887		Facilities Charge per month per kW of Contracted Standby Capacity
7			$0.922	Summer
8			$0.679	Winter
9	Summer Demand Charge, $/kW		$0.922	Generation and Transmission Access Charge per month per kW of Contracted Standby Capacity
10	block 1 - first 2443 kW	$15.079		
11	block 2 - next 2443 kW	$12.061		
12	block 3 - next 2443 kW	$10.104		
13	block 4 - all over 7329 kW	$7.376	Daily Standby Demand Rate - Summer	
14			$0.628	Back-Up
15	Winter Demand Charge, $/kW		$0.314	Maintenance
16	block 1 - first 2443 kW	$10.250		
17	block 2 - next 2443 kW	$7.998	Daily Standby Demand Rate - Winter	
18	block 3 - next 2443 kW	$7.056	$0.576	Back-Up
19	block 4 - all over 7329 kW	$5.432	$0.288	Maintenance
20				
21	Summer Energy charge, $/kWh		Back-Up Energy Charges - Summer	
22	block 1 - first 180 hours use	$0.09442	$0.09442	kWh in excess of Supplemental Contract Capacity
23	block 2 - second 180 hours use	$0.05612		
24	block 3 - over 360 hours use	$0.02693		
25				
26	Winter Energy charge, $/kWh		Back-Up Energy Charges - Winter	
27	block 1 - first 180 hours use	$0.08004	$0.08004	kWh in excess of Supplemental Contract Capacity
28	block 2 - second 180 hours use	$0.05105		
29	block 3 - over 360 hours use	$0.02666		

*SSR customers are billed monthly facilities charges calculated as the per kW facilities charge multiplied by the Supplemental Contract Capacity.

TABLE 6. Large Primary Service, Primary Voltage

	KCP&L Propsosed Rate		DE Proposed KCP&L SSR	
	LPS Primary Voltage Service		LPS Primary Voltage Service	
	A	B	C	D
1	Minimum demand, kW	1000	1000	Minimum Supplemental Contract Capacity, kW
2			**Standby Fixed Charges**	
3	**Customer charge, $**	$1,160.53		
4			$430.00	**Administrative Charge**
5				
6	**Facilities Charge, $/kW***	$3.221		**Facilities Charge per month per kW of Contracted Standby Capacity**
7			$0.901	Summer
8			$0.664	Winter
9	**Summer Demand Charge, $/kW**		$0.901	**Generation and Transmission Access Charge per month per kW of Contracted Standby Capacity**
10	block 1 - first 2500 kW	$14.732		
11	block 2 - next 2500 kW	$11.787		
12	block 3 - next 2500 kW	$9.872		
13	block 4 - all over 7500 kW	$7.208	**Daily Standby Demand Rate - Summer**	
14			$0.575	Back-Up
15	**Winter Demand Charge, $/kW**		$0.288	Maintenance
16	block 1 - first 2500 kW	$10.012		
17	block 2 - next 2500 kW	$7.816	**Daily Standby Demand Rate - Winter**	
18	block 3 - next 2500 kW	$6.894	$0.524	Back-Up
19	block 4 - all over 7500 kW	$5.309	$0.262	Maintenance
20				
21	**Summer Energy charge, $/kWh**		**Back-Up Energy Charges - Summer**	
22	block 1 - first 180 hours use	$0.09226	$0.09226	kWh in excess of Supplemental Contract Capacity
23	block 2 - second 180 hours use	$0.05485		
24	block 3 - over 360 hours use	$0.02630		
25				
26	**Winter Energy charge, $/kWh**		**Back-Up Energy Charges - Winter**	
27	block 1 - first 180 hours use	$0.07821	$0.07821	kWh in excess of Supplemental Contract Capacity
28	block 2 - second 180 hours use	$0.04987		
29	block 3 - over 360 hours use	$0.02605		

*SSR customers are billed monthly facilities charges calculated as the per kW facilities charge multiplied by the Supplemental Contract Capacity.

TABLE 7. Large Primary Service, Substation Voltage

	KCP&L Propsosed Rate			DE Proposed KCP&L SSR	
	LPS Substation Voltage Service			LPS Substation Voltage Service	
	A	B		C	D
1	Minimum demand, kW	1000		1000	Minimum Supplemental Contract Capacity, kW
2				Standby Fixed Charges	
3	Customer charge, $	$1,160.53			
4				$430.00	Administrative Charge
5					
6	Facilities Charge, $/kW*	$0.972			Facilities Charge per month per kW of Contracted Standby Capacity
7				$0.890	Summer
8				$0.656	Winter
9	Summer Demand Charge, $/kW			$0.890	Generation and Transmission Access Charge per month per kW of Contracted Standby Capacity
10	block 1 - first 2530 kW	$14.570			
11	block 2 - next 2530 kW	$11.645			
12	block 3 - next 2530 kW	$9.755			
13	block 4 - all over 7590 kW	$7.123		Daily Standby Demand Rate - Summer	
14				$0.421	Back-Up
15	Winter Demand Charge, $/kW			$0.210	Maintenance
16	block 1 - first 2530 kW	$9.896			
17	block 2 - next 2530 kW	$7.724		Daily Standby Demand Rate - Winter	
18	block 3 - next 2530 kW	$6.814		$0.371	Back-Up
19	block 4 - all over 7590 kW	$5.246		$0.185	Maintenance
20					
21	Summer Energy charge, $/kWh			Back-Up Energy Charges - Summer	
22	block 1 - first 180 hours use	$0.09118		$0.09118	kWh in excess of Supplemental Contract Capacity
23	block 2 - second 180 hours use	$0.05421			
24	block 3 - over 360 hours use	$0.02598			
25					
26	Winter Energy charge, $/kWh			Back-Up Energy Charges - Winter	
27	block 1 - first 180 hours use	$0.07731		$0.07731	kWh in excess of Supplemental Contract Capacity
28	block 2 - second 180 hours use	$0.04928			
29	block 3 - over 360 hours use	$0.02574			

*SSR customers are billed monthly facilities charges calculated as the per kW facilities charge multiplied by the Supplemental Contract Capacity.

TABLE 8. Large Primary Service, Transmission Voltage

	KCP&L Propsosed Rate		DE Proposed KCP&L SSR	
	LPS Transmission Voltage Service		LPS Transmission Voltage Service	
	A	B	C	D
1	Minimum demand, kW	1000	1000	Minimum Supplemental Contract Capacity, kW
2			**Standby Fixed Charges**	
3	**Customer charge, $**	$1,160.53		
4			$430.00	**Administrative Charge**
5				
6	**Facilities Charge, $/kW***	$0.000		**Facilities Charge per month per kW of Contracted Standby Capacity**
7			$0.882	Summer
8			$0.650	Winter
9	**Summer Demand Charge, $/kW**		$0.882	**Generation and Transmission Access Charge per month per kW of Contracted Standby Capacity**
10	block 1 - first 2553 kW	$14.431		
11	block 2 - next 2553 kW	$11.541		
12	block 3 - next 2553 kW	$9.666		
13	block 4 - all over 7659 kW	$7.059	**Daily Standby Demand Rate - Summer**	
14			$0.353	Back-Up
15	**Winter Demand Charge, $/kW**		$0.176	Maintenance
16	block 1 - first 2553 kW	$9.807		
17	block 2 - next 2553 kW	$7.655	**Daily Standby Demand Rate - Winter**	
18	block 3 - next 2553 kW	$6.754	$0.303	Back-Up
19	block 4 - all over 7659 kW	$5.199	$0.152	Maintenance
20				
21	**Summer Energy charge, $/kWh**		**Back-Up Energy Charges - Summer**	
22	block 1 - first 180 hours use	$0.09037	$0.09037	kWh in excess of Supplemental Contract Capacity
23	block 2 - second 180 hours use	$0.05371		
24	block 3 - over 360 hours use	$0.02576		
25				
26	**Winter Energy charge, $/kWh**		**Back-Up Energy Charges - Winter**	
27	block 1 - first 180 hours use	$0.07660	$0.07660	kWh in excess of Supplemental Contract Capacity
28	block 2 - second 180 hours use	$0.04885		
29	block 3 - over 360 hours use	$0.02550		

*SSR customers are billed monthly facilities charges calculated as the per kW facilities charge multiplied by the Supplemental Contract Capacity.

TABLE 9. Outage schedule used for KCP&L SSR Study Tool.

OUTAGE SUMMARY			
Month	Outage Description	Maintenance hrs	FO hrs
January	FO- Fri 20th hr 1 through Sat 21st hr 18 (42 hrs total)		42
February	FO- Mon 17th hr 1 through hr 24 (24 hrs total)		24
March	FO- Fri 31st hr 4 through hr 10 (7 hrs total)		7
April	FO -Thurs 6th hr 12 through hr 14 (3 hrs total); FO - Thurs 27th hr 3 through hr 5 (3 hrs total)		6
May	FO -Fri 2nd hr 12 through hr 14 (3 hrs total); FO - Sat 27th hr 3 through hr 5 (3 hrs total)		6
June	FO - Fri 23rd hr 1 through Sat 24th hr 18 (42 hrs total)		42
July	Scheduled - Thurs 20th hr 1 through hr 22	22	
August	FO -Thurs 31st hr 11 through hr 17 (7 hrs total); FO - Sun 6th hr 12 through hr 14 (3 hrs total)		10
September	FO -Wed 27th hr 3 through hr 5 (3 hrs total)		3
October	FO -Tues 31st hr 11 through hr 17 (7 hrs total)		7
November	Scheduled - Tues 21st hr 11 through 28th hr 10 (168 hrs total)	168	
December	FO -Fri 15th hr 3 through hr 5 (3 hrs total)		3
		190	150
		2.17%	1.71%

TABLE 10. Study results for alternative rate proposal for KCP&L LGS Secondary Voltage.

	Full Service Requirement		Supplemental + SSR			Generated	Avoided Cost
	kWh	Bill	kWh	Bill	Avoided Cost	kWh	Percentage*
January	2,005,478.11	148,183.38	1,100,503.34	88,733.85	59,449.54	904,974.77	0.889058702
February	1,853,657.89	141,168.85	1,018,530.89	83,678.50	57,490.34	835,127.00	0.903926431
March	1,946,291.17	144,281.96	1,087,999.52	84,139.03	60,142.93	858,291.65	0.945247314
April	1,881,793.37	142,516.61	1,054,846.98	83,286.68	59,229.93	826,946.39	0.945736801
May	2,024,024.05	154,598.27	1,144,593.77	90,124.33	64,473.94	879,430.28	0.959828927
June	2,094,030.51	193,140.09	1,257,721.64	123,135.86	70,004.23	836,308.87	0.907545028
July	2,189,453.50	198,976.73	1,332,703.04	122,787.02	76,189.70	856,750.46	0.978532795
August	2,239,081.96	204,452.48	1,323,608.66	129,009.84	75,442.64	915,473.30	0.902503266
September	2,074,302.08	195,491.03	1,227,506.84	116,981.63	78,509.39	846,795.25	0.983758227
October	1,970,437.56	147,502.86	1,112,356.27	86,454.20	61,048.66	858,081.30	0.950407647
November	1,839,658.22	138,542.04	1,110,860.13	94,710.59	43,831.46	728,798.09	0.79860909
December	1,877,201.47	139,049.07	943,367.99	74,576.43	64,472.64	933,833.48	0.932070615
Annual	23,995,409.90	1,947,903.36	13,714,599.05	1,177,617.97	770,285.40	10,280,810.85	0.922964637