Exhibit No.:
Issue: Minimum Filing Requirements; Annualized/Normalized Revenues; Class Cost of Service; and Rate Design
Witness: Marisol E. Miller
Type of Exhibit: Direct Testimony
Sponsoring Party: Kansas City Power & Light Company
Case No.: ER-2016-0285
Date Testimony Prepared: July 1, 2016

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2016-0285

DIRECT TESTIMONY

OF

MARISOL E. MILLER

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

Kansas City, Missouri
July 2016

TABLE OF CONTENTS

DIRECT TESTIMONY

OF

MARISOL E. MILLER

Case No. ER-2016-0285

Q: Please state your name and business address.

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

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

A: I am employed by Kansas City Power & Light Company ("KCP&L" or "Company") as Supervisor – Regulatory Affairs.

Q: On whose behalf are you testifying?

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

Q: What are your responsibilities?

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

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

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

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

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

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

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

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

A: No.

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to:

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

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

III. Explain the Electric Class Cost of Service Study; and

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

I. MINIMUM FILING REQUIREMENTS

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

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

Q: How did KCP&L satisfy the MFR?

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

A. Letter of transmittal;

B. General information, including:

1. The amount of dollars of the aggregate annual increase and percentage over current revenues;
2. Names of counties and communities affected;
3. The number of customers to be affected;
4. The average change requested in dollars and percentage change from current rates;
5. The proposed annual aggregate change by general categories of service and by rate classification;

6. Press releases relative to the filing; and

7. A summary of reasons for the proposed changes.

II. ANNUALIZED/NORMALIZED REVENUES

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

A: Yes, they were.

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

A: Both the weather-normalized kWh sales and customer growth levels by rate class were developed by Company witness Albert R. Bass, Jr. Mr. Bass explains those figures in his Direct Testimony. The test year used by the Company in this case was the 12 months ending December 31, 2015, which we expect will be updated for known and measurable changes through December 31, 2016. The monthly bill frequencies for the 12 months ending December 31, 2015, that contain the billing units for each of the billing blocks for the various rate components, were developed under my supervision. These bill frequencies were developed by collecting the actual usage and customer counts billed in each month of the test period and applying them to the existing rate structures. By applying the existing rates to the usage in each of the billing blocks, the revenues were reproduced, providing a basis for determining the overall revenues to be used in this case. The Company determined monthly revenues by applying the normalized sales and customer levels for each month represented in the test period to the corresponding billing frequency. The normalized sales and customer levels from this were then multiplied by the rates that took effect on September 29, 2015 to obtain the weather normalized monthly revenues available. The sum of the monthly revenues was compared to the

actual revenues for the test year ending December 31, 2015 to determine the revenue adjustment contained in the Summary of Adjustments attached to the Direct Testimony of Company witness Ronald A. Klote as Schedule RAK-4 (adjustment no. R-20).

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

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

III. ELECTRIC CLASS COST OF SERVICE STUDY

Q: Has the Company performed an electric Class Cost of Service ("CCOS") study for this case?

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

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

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

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

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

Q: What is the purpose of the CCOS study?

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

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

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

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

A: The primary classes the Company used in its analysis are Residential, Small General Service, Medium General Service, Large General Service, Large Power Service, and Lighting. Additionally, the study includes details at the rate level, expressed by season.

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

A: Generally, they do. The Residential class has several rate classifications available to it that include general use, one-meter general use and heat, and a two-meter rate with general use on one meter and a separate meter for space heating. The Small General Service, Medium General Service and Large General Service classes also have general usage rates and all electric rates, plus they can be specific to the voltage level at which the customer receives service. The Large Power Service class is distinguished by the

specific voltage at which the customer receives service. In total, the Company has five classes of service (plus Lighting), but has approximately 61 rates to meet the specific needs of the customer and reporting and billing requirements.

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

A: The study is based on a historical test year of the 12 months ending December 31, 2015, with known and measurable changes projected through December 31, 2016.

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

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

Q: Please explain what you mean.

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

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

A: Customer-related costs are those costs necessary to provide electric service to the customer independent of any usage by the customer. Some examples of these costs include meter reading, customer accounting, billing and some investment in plant equipment such as the meter and service line, facilities that are all necessary to make

service available. Portions of the distribution facility are separated between the customer costs and the demand costs.

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

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

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

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

Q: How are the allocation factors generally determined?

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

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

Q: How are class demand allocation factors generally determined?

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

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

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

Q: Are any costs assigned directly to classes?

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

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

A: Production plant is the single, largest component cost to allocate to the classes within the study. As such, the production allocator has the most impact on the outcome of the CCOS study. In 2012, the Company reviewed industry data and information available within the public domain, including the National Association of Regulatory Utility Commissioners' ("NARUC's") "Electric Utility Cost Allocation Manual" published in January 1992 with the objective of validation of the production plant allocation method being used or exploring other possible alternatives. The Company reviewed an informal

survey performed by the Edison Electric Institute on plant allocation methods. Finally, we looked at testimony from recent Missouri and Kansas rate proceedings, exploring the positions offered by parties on the topic. The evaluation considered the three main categories of production allocation defined in the NARUC materials; Peak Demand, Energy Weighted, and Time Differentiated methods. After considering all allocation theories and ensuring that the selected method aligned with the principles of reflecting actual planning and operating characteristics, cost causation, recognizing the broad set of customer class characteristics and their usage, and producing stable results on a year to year basis, the Company selected the utilization of the Energy Weighted approach, specifically the Average & Peak Production Plant Allocation method, incorporating a four (4) Coincident Peak (CP) component. An Energy Weighted approach was viewed to be cost effective, balanced through its incorporation of energy, and less subjective than other methods. Utilization of the Average & Peak method is an energy-weighted method of production plant allocation that gives classes recognition for both usage and contribution to peak load.

Q: Has this allocation method been proposed before?

A: Yes. The Average & Peak method has been proposed by KCP&L most recently in Case No. ER-2014-0370 and by Greater Missouri Operations (GMO) Company in Case No. ER-2016-0156. Additionally, KCP&L had also used the Average & Peak method in Case No. ER-2006-0314 and ER-2007-0291.

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

A: Fuel costs were allocated using a seasonal, monthly kWh allocator. Based on monthly fuel costs from the Company for the 12 months ended December 31, 2015, each month's fuel costs were allocated to each customer class's corresponding calendar month kWh sales adjusted for losses. These allocated results were summed seasonally, by rate and major customer class to identify a proxy fuel allocator which was then used to allocate the actual fuel costs shown in the CCOS study.

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

A: They were allocated using the Energy allocator.

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

A: Transmission plant costs were allocated using Average & Peak-4CP.

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

A: Distribution Plant was primarily allocated using a Non-Coincident Peak (NCP) demand allocator based on the use of NCP class demands for Primary Plant in Accounts 360 through 367, with the exception of Account 363, which used a 12-CP demand allocation. Also, Accounts 364, 365, 366 and 367 included methods to recognize primary and secondary voltage cost separation.

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

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

Q: What method did you use to allocate Services?

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

Q: What method did you use to allocate Meters?

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

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

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

- Additions to net plant included cash working capital, materials and supplies, prepayments, fuel inventory, and various regulatory assets.
- The cash working capital component of rate base was developed and allocated on related expenses or plant in the CCOS study.
- Materials and supplies were allocated on total plant and demand allocation factors.
- Prepayment items were allocated using total plant, customers, and demand allocation factors.
- Fuel inventory was allocated on energy.
- The regulatory assets were allocated on labor, energy, or demand allocation factors depending on the costs tracked.
- The accumulated deferred taxes were allocated on total plant.
- Customer advances for construction were allocated on total distribution plant.

- Customer deposits were developed using the data analysis by customer group available from the Company.

Q: What revenues did you use for this study?

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

Q: How were Operation and Maintenance ("O&M") Expenses allocated?

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

- Account 930.1, General Advertising, which was allocated based on the number of customers
- Account 928, Regulatory Commission expenses, which was primarily allocated to classes on revenues at the uniform claimed rate of return
- Account 935 Maintenance of General Plant, which was allocated on general plant.

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

A: The next step is to determine the relative return on rate base for each of the classes and rates in the study. The ratio of class revenues less expense (net operating income) divided by class rate base will indicate the rate of return being earned by the Company

that is attributable to a particular class. It is necessary to keep in mind that this calculation only represents a snapshot in time. The results of the CCOS study will most likely vary over time. The results of the study will also vary if you apply different allocation factors to the study. By applying different methods to the allocation process, you can change the outcome of the CCOS study.

Q: What were the results of the CCOS study?

A: The jurisdictional rate of return was calculated to be 5.5%. Individual classes' rates of return at current rates vary, and based on the current costs, are shown in the following table.

Residential	Small General Service	Medium General Service	Large General Service	Large Power Service	Other Lighting
4.0%	8.2%	7.0	7.2%	4.9%	9.4%

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

A: To achieve the jurisdictional revenue increase of 10.8%, the classes should be adjusted by the percentages in the table below.

Residential	Small General Service	Medium General Service	Large General Service	Large Power Service	Other Lighting
20.0%	-2.3%	3.4%	2.3%	14.2%	-6.8%

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

A: The results of the CCOS study show that each class of customers recovers the cost of service to that class and provides a return on investment. The results also show the Residential and Large Power class revenues are below the Total MO Retail rate of return level while the Small General, Medium General and Large General class revenues are

above. The revenues for the lighting class appear well above the Total MO Retail rate of return.

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

A: Yes, another element of the study was to explore costs at the rate level and the season level. This data provides additional information to aid the Company in preparing its rate design.

Q: What were the results at the rate and season level?

A: Adding these multiple levels of detail increase the amount of data so it is best to present the results in the form of tables. Schedule MEM-2 is attached to provide that information. Review of the results show that the summer and winter rates for each class provide recovery of the cost of service and a return on the investment. The CCOS study demonstrates that rates charged during the winter, in nearly every case, provide a higher contribution to the average return on investment than the summer rates.

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

A: Yes. Utilizing the results from the study prepared based on the Average & Peak production allocation; the Company has identified the following:

- Apply no increase to the Lighting class (unmetered),
- Apply the increase equally to the remaining classes (adjusted for pre-MEEIA opt-out revenues), and

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

IV. ELECTRIC RATE DESIGN

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

A: Yes, I am.

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

A: The Company is requesting an annual aggregate increase over current revenues reflecting impacts before the rebasing of fuel for the fuel adjustment clause, in the amount of $62.9 million (7.52%). The aggregate annual increase over current revenues including the rebasing of fuel for the fuel adjustment clause is $90.1 million (10.77%). The Company is proposing that the requested increase be applied to all metered classes on an equal percentage basis, with the exception of the Lighting class. The summary of revenues and proposed increase by class may be found in Schedules MEM-5 and MEM-5A.**Q: Are there any new tariffs being filed as part of this case?**

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

Q: Please summarize the proposed changes to rules & regulation tariffs?

A: Proposed changes are minimal and are proposed to better align the rules & regulations with current costs or planned business practices. The specific, proposed changes to rules and regulations and non-base rate tariffs may be found in Schedule MEM-4.

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

A: No. As mentioned previously, the CCOS studies indicated the unmetered Lighting class did not need to be increased. Further, the Company made a filing to introduce Light

Emitting Diode ("LED") in KCP&L's jurisdiction in tariff filing JE-2016-0344 on June 1, 2016 with rates effective on July 1, 2016. The Company requested approval of tariffs which will allow it to pursue a structured conversion of all roadway lighting (non-decorative, pole mounted, over road lighting) to LED fixtures. Over an approximately six month conversion, KCP&L proposes to convert approximately 7,500 lights.

Q: Are you proposing any additional tariff changes?

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

Q: Does that conclude your testimony?

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-2016-0285

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 Seventeen (17) 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 1st day of July, 2016.

Notary Public

My commission expires: Feb. 4 2019

NICOLE A. WEHRY
Notary Public - Notary Seal
State of Missouri
Commissioned for Jackson County
My Commission Expires: February 04, 2019
Commission Number: 14391200

Kansas City Power & Light Company
2016 RATE CASE - Direct
COST OF SERVICE - Missouri Jurisdiction
TY 12/31/15; Update TBD; K&M 12/31/16

Allocation Method: Production - Avg & Pk 4 CP, Transmission - Avg & Pk 4 CP

SCH NO.	LINE 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	
1	0020		Reference								
1	0030	OPERATING REVENUE									
1	0040	RETAIL SALES REVENUE	TSFR 9 90	837,233,404	315,251,522	55,236,249	121,694,450	188,383,024	146,155,580	10,512,579	
1	0050	OTHER OPERATING REVENUE	TSFR 9 340	250,855,503	77,386,264	12,646,823	35,518,208	63,134,718	59,580,486	2,589,005	
1	0060	TOTAL OPERATING REVENUE		1,088,088,907	392,637,785	67,883,073	157,212,658	251,517,742	205,736,066	13,101,584	
1	0070										
1	0080	OPERATING EXPENSES									
1	0090	FUEL	TSFR 9 4090	158,701,965	48,810,420	7,970,002	22,480,913	39,982,527	37,860,280	1,597,822	
1	0100	PURCHASED POWER	TSFR 9 4100	222,730,875	68,045,349	11,174,536	31,551,320	56,350,176	53,324,669	2,284,824	
1	0110	OTHER OPERATION & MAINTENANCE EXPENSES	TSFR 9 4110	306,891,041	137,653,947	18,905,490	37,897,728	57,848,315	51,009,253	3,576,307	
1	0120	DEPRECIATION EXPENSES (AFTER CLEARINGS)	TSFR 5 1430	127,861,126	52,953,452	7,565,080	18,199,136	26,208,065	21,673,239	1,262,154	
1	0130	AMORTIZATION EXPENSES	TSFR 9 4590	20,874,322	8,345,778	1,205,825	2,959,925	4,428,850	3,710,786	223,157	
1	0140	TAXES OTHER THAN INCOME TAXES	TSFR 9 4710	65,449,969	26,814,869	3,845,853	9,095,574	13,575,211	11,395,557	722,906	
1	0150	CURRENT INCOME TAXES	TSFR 11 620	29,136,031	2,754,936	4,243,825	7,632,427	11,230,920	2,430,544	843,379	
1	0160	DEFERRED INCOME TAXES	TSFR 11 690	13,528,201	5,561,049	793,818	1,895,522	2,802,056	2,326,207	149,549	
1	0170	TOTAL ELECTRIC OPERATING EXPENSES		945,173,529	350,939,800	55,704,430	131,712,546	212,426,121	183,730,534	10,660,099	
1	0180										
1	0190	NET ELECTRIC OPERATING INCOME		142,915,379	41,697,985	12,178,643	25,500,112	39,091,621	22,005,532	2,441,485	
1	0200										
1	0210	RATE BASE									
1	0220	TOTAL ELECTRIC PLANT	TSFR 3 190	5,274,249,638	2,152,742,391	308,060,262	738,886,948	1,099,632,949	918,222,734	56,704,355	
1	0230	LESS: ACCUM. PROV. FOR DEPREC	TSFR 6 1700	2,072,173,694	844,030,676	121,333,189	287,261,508	431,949,865	363,923,703	23,674,752	
1	0240	NET PLANT		3,202,075,945	1,308,711,715	186,727,073	451,625,440	667,683,083	554,299,031	33,029,604	
1	0250	PLUS:									
1	0260	CASH WORKING CAPITAL	TSFR 2 30	(62,071,389)	(24,750,482)	(3,837,641)	(8,834,004)	(13,259,163)	(10,667,113)	(722,986)	
1	0270	MATERIALS & SUPPLIES	TSFR 2 100	59,031,048	22,800,474	3,336,477	8,375,969	12,898,182	11,066,946	553,000	
1	0280	PREPAYMENTS	TSFR 2 170	7,124,681	2,722,398	397,720	982,272	1,574,620	1,397,750	49,922	
1	0290	FUEL INVENTORY	TSFR 2 240	66,320,675	20,308,703	3,324,416	9,393,610	16,742,995	15,874,130	676,821	
1	0300	REGULATORY ASSETS	TSFR 2 330	74,763,183	26,974,310	4,049,004	10,612,421	17,558,117	14,938,798	630,533	
1	0310	LESS:									
1	0320	CUSTOMER ADVANCES FOR CONSTRUCTION	TSFR 2 380	1,667,781	921,050	119,681	234,735	235,189	114,509	42,618	
1	0330	CUSTOMER DEPOSITS	TSFR 2 390	4,020,118	2,138,954	1,507,973	315,716	53,293	4,181	0	
1	0340	DEFERRED INCOME TAXES	TSFR 2 400	729,963,824	297,942,679	42,635,988	102,263,029	152,190,800	127,083,362	7,847,965	
1	0350	DEFERRED GAIN ON SO2 EMISSIONS ALLOWANCE	TSFR 2 410	35,319,134	10,790,165	1,771,981	5,003,192	8,935,624	8,455,860	362,312	
1	0360	DEFERRED GAIN(LOSS) EMISSIONS ALLOWANCE	TSFR 2 420	0	0	0	0	0	0	0	
1	0370	TOTAL RATE BASE		2,576,273,286	1,044,974,270	147,961,424	364,339,038	541,782,927	451,251,629	25,963,999	
1	0380										
1	0390	RATE OF RETURN		5.547%	3.990%	8.231%	6.999%	7.215%	4.877%	9.403%	
1	0400	RELATIVE RATE OF RETURN		1.00	0.72	1.48	1.26	1.30	0.88	1.70	
1	0410										
1	0420										
1	0430										
1	0440										
1	0450										
1	0460										
1	0470										
1	0480										
1	0490										

Kansas City Power & Light Company - Missouri
Table 3
Cost of Service Results – Class ROR and Index of Return

Customer Class	Index of Return Annual	Rate of Return % Annual	Rate of Return % Seasonal Summer	Rate of Return % Seasonal Winter
RESIDENTIAL	0.72	3.990%	2.002%	6.512%
Regular	0.75	4.155%	1.947%	7.213%
Time of Day	0.69	3.807%	2.786%	5.111%
All Electric	0.67	3.741%	2.436%	5.092%
Separately Metered	0.47	2.634%	1.147%	3.837%
SMALL GS	1.48	8.231%	3.744%	13.714%
Primary & Secondary	1.48	8.233%	3.753%	13.763%
Other (Unmetered)	1.88	10.457%	4.365%	17.682%
All Electric	1.34	7.445%	2.854%	12.110%
Separately Metered	1.26	6.997%	4.377%	9.324%
MEDIUM GS	1.26	6.999%	2.424%	12.700%
Primary	1.80	9.982%	4.546%	15.115%
Secondary	1.28	7.109%	2.449%	13.055%
All Electric	1.05	5.832%	2.023%	9.719%
Separately Metered	1.11	6.131%	2.228%	10.881%
LARGE GS	1.30	7.215%	2.279%	13.269%
Primary	1.33	7.404%	2.241%	14.086%
Secondary	1.35	7.486%	2.419%	14.094%
All Electric	1.19	6.585%	1.929%	11.664%
Separately Metered	1.63	9.065%	4.126%	14.783%
LARGE POWER SERVICE	0.88	4.877%	0.623%	10.395%
Primary	1.01	5.602%	1.253%	10.975%
Secondary	1.08	5.963%	1.463%	11.600%
Substation	0.20	1.090%	-1.760%	4.974%
Transmission	0.80	4.463%	-0.383%	12.222%
TOTAL LIGHTING	1.70	9.403%		
MISSOURI RETAIL	1.00	5.547%		

Note - Allocation Method: Production - Avg & Pk 4 CP, Transmission - Avg & Pk 4 CP

Kansas City Power & Light Company - Missouri
Table 4
Cost of Service Results – Unbundled Customer, Demand and Energy Cost Components

Uniform Rate of Return @ 7.7%

Customer Class	Monthly ($) Customer Charge	Annual Energy Costs ($)	Seasonal Energy Costs ($)		Demand Costs ($/kWh)		
			Summer	Winter	Annual	Seasonal Summer	Seasonal Winter
RESIDENTIAL	$16.68	0.0214	0.0226	0.0207	0.1076	0.1553	0.0762
Regular	$16.34	0.0215	0.0226	0.0207	0.1115	0.1563	0.0784
Time of Day	$23.26	0.0214	0.0227	0.0205	0.1036	0.1438	0.0747
All Electric	$16.99	0.0212	0.0225	0.0206	0.0973	0.1491	0.0709
Separately Metered	$21.41	0.0211	0.0226	0.0206	0.0988	0.1652	0.0741
SMALL GS	$22.38	0.0211	0.0227	0.0202	0.0911	0.1421	0.0621
Primary & Secondary	$22.84	0.0211	0.0227	0.0202	0.0913	0.1419	0.0621
Other (Unmetered)	$10.06	0.0212	0.0228	0.0205	0.0877	0.1424	0.0603
All Electric	$25.58	0.0210	0.0224	0.0203	0.0873	0.1458	0.0615
Separately Metered	$37.00	0.0209	0.0225	0.0203	0.0893	0.1532	0.0642
MEDIUM GS	$43.50	0.0211	0.0226	0.0202	0.0833	0.1287	0.0576
Primary	$24.48	0.0205	0.0222	0.0199	0.0726	0.1285	0.0516
Secondary	$42.48	0.0211	0.0227	0.0201	0.0835	0.1283	0.0576
All Electric	$55.54	0.0209	0.0225	0.0202	0.0821	0.1336	0.0588
Separately Metered	$64.59	0.0211	0.0227	0.0202	0.0832	0.1295	0.0577
LARGE GS	$58.80	0.0209	0.0225	0.0200	0.0700	0.1106	0.0484
Primary	$57.45	0.0205	0.0222	0.0196	0.0672	0.1071	0.0456
Secondary	$57.52	0.0210	0.0226	0.0201	0.0715	0.1106	0.0490
All Electric	$57.52	0.0208	0.0224	0.0201	0.0687	0.1117	0.0484
Separately Metered	$99.35	0.0210	0.0227	0.0201	0.0711	0.1134	0.0496
LARGE POWER SERVICE	$616.33	0.0205	0.0219	0.0197	0.0607	0.0936	0.0418
Primary	$652.22	0.0205	0.0219	0.0197	0.0622	0.0951	0.0437
Secondary	$551.56	0.0210	0.0225	0.0202	0.0656	0.0989	0.0461
Substation	$648.09	0.0203	0.0215	0.0196	0.0553	0.0875	0.0370
Transmission	$647.68	0.0199	0.0216	0.0188	0.0550	0.0880	0.0346
TOTAL LIGHTING		0.0209			0.0436		

Note - Allocation Method: Production - Avg & Pk 4 CP, Transmission - Avg & Pk 4 CP

	A	B	C	D	E	F	G	H	I	J	K
1	**KCP&L-MO LARGE POWER SERVICE**										
2											
3	**ER-2016-0285**										
4											
5			*INPUT FOR MODEL*								
6		**Cust Chg**	**Current Rates**	**Rates With Increase**	**PROPOSED RATES**		**Proposed Scenarios**				
7											
8				0.11							
9											
10											
11	A: CUSTOMER CHARGE										
12			1,106.30	1,106.30	1,226.93						
13			-	-	-						
14			-	-	-						
15			-	-	-						
16	B: FACILITIES CHARGE		-	-	-						
17		SECONDARY:	3.705	3.705	4.109						
18		PRIMARY:	3.071	3.071	3.406						
19		SUBSTATION VOLTAGE	0.927	0.927	1.028						
20		TRANSM VOLTAGE	-	-	-						
21			-	-	-						
22	C: DEMAND CHARGE		-	-	-						
23		SECONDARY-SUMMER:	-	-	-						
24		First 2443 kw	14.374	14.374	15.942						
25		Next 2443 kw	11.498	11.498	12.752						
26		Next 2443 kw	9.632	9.632	10.682						
27		All kw over 7329 kw	7.031	7.031	7.798						
28		SECONDARY-WINTER	-	-	-						
29		First 2443 kw	9.771	9.771	10.837						
30		Next 2443 kw	7.624	7.624	8.455						
31		Next 2443 kw	6.726	6.726	7.459						
32		All kw over 7329 kw	5.178	5.178	5.743						
33			-	-	-						
34		PRIMARY-SUMMER	-	-	-						
35		First 2500 kw	14.044	14.044	15.576						
36		Next 2500 kw	11.236	11.236	12.461						
37		Next 2500 kw	9.411	9.411	10.437						
38		All kw over 7500 kw	6.871	6.871	7.620						
39		PRIMARY-WINTER	-	-	-						
40		First 2500 kw	9.545	9.545	10.587						
41		Next 2500 kw	7.451	7.451	8.263						
42		Next 2500 kw	6.572	6.572	7.289						
43		All kw over 7500 kw	5.061	5.061	5.613						
44			-	-	-						
45		SUBSTATION-SUMMER	-	-	-						
46		First 2530 kw	13.876	13.876	15.389						
47		Next 2530 kw	11.101	11.101	12.311						
48		Next 2530 kw	9.299	9.299	10.313						
49		All kw over 7590 kw	6.790	6.790	7.530						
50		SUBSTATION-WINTER	-	-	-						
51		First 2530 kw	9.434	9.434	10.463						
52		Next 2530 kw	7.363	7.363	8.166						
53		Next 2530 kw	6.496	6.496	7.204						
54		All kw over 7590 kw	5.001	5.001	5.546						
55			-	-	-						
56		TRANSMISSION-SUMMER	-	-	-						
57		First 2553 kw	13.757	13.757	15.257						
58		Next 2553 kw	11.002	11.002	12.202						
59		Next 2553 kw	9.214	9.214	10.219						
60		All kw over 7659 kw	6.729	6.729	7.463						
61		TRANSMISSION-WINTER	-	-	-						
62		First 2553 kw	9.349	9.349	10.368						
63		Next 2553 kw	7.297	7.297	8.093						
64		Next 2553 kw	6.438	6.438	7.140						
65		All kw over 7659 kw	4.956	4.956	5.496						
66			-	-	-						
67	D: ENERGY CHARGE		-	-	-						
68		SECONDARY-SUMMER:	-	-	-						
69		0-180 hrs use per month	0.09000	0.09000	0.10008						
70		181-360 hrs use per month	0.05348	0.05348	0.05958						
71		361+ hrs use per month	0.02566	0.02566	0.02865						
72		SECONDARY-WINTER:	0.00000	-	-						
73		0-180 hrs use per month	0.07630	0.07630	0.08489						
74		181-360 hrs use per month	0.04866	0.04866	0.05424						
75		361+ hrs use per month	0.02541	0.02541	0.02837						
76			0.00000	-	-						
77		PRIMARY-SUMMER:	0.00000	-	-						
78		0-180 hrs use per month	0.08794	0.08794	0.09780						
79		181-360 hrs use per month	0.05228	0.05228	0.05825						

	A	B	C	D	E	F	G	H	I	J	K
80		361+ hrs use per month	0.02507	0.02507	0.02798						
81		PRIMARY-WINTER:	0.00000	-	-						
82		0-180 hrs use per month	0.07456	0.07456	0.08296						
83		181-360 hrs use per month	0.04754	0.04754	0.05299						
84		361+ hrs use per month	0.02484	0.02484	0.02773						
85			0.00000	-	-						
86		SUBSTATION-SUMMER	0.00000	-	-						
87		0-180 hrs use per month	0.08692	0.08692	0.09667						
88		181-360 hrs use per month	0.05167	0.05167	0.05757						
89		361+ hrs use per month	0.02477	0.02477	0.02760						
90		SUBSTATION-WINTER	0.00000	-	-						
91		0-180 hrs use per month	0.07370	0.07370	0.08201						
92		181-360 hrs use per month	0.04698	0.04698	0.05237						
93		361+ hrs use per month	0.02454	0.02454	0.02735						
94			0.00000	-	-						
95		TRANSMISSION-SUMMER	0.00000	-	-						
96		0-180 hrs use per month	0.08615	0.08615	0.09581						
97		181-360 hrs use per month	0.05120	0.05120	0.05705						
98		361+ hrs use per month	0.02456	0.02456	0.02737						
99		TRANSMISSION-WINTER	0.00000	-	-						
100		0-180 hrs use per month	0.07302	0.07302	0.08125						
101		181-360 hrs use per month	0.04656	0.04656	0.05191						
102		361+ hrs use per month	0.02431	0.02431	0.02709						
103			0.00000	-	-						
104	E: REACTIVE DEMAND ADJUSTMENT		0.930	0.930	1.031						
105				-	-						
106	LGS Secondary		100.00%		11.20%						
107	LGS Primary		100.00%		11.21%						
108	LGS Substation Voltage		100.00%		11.25%						
109	LGS Transmission Voltage		100.00%		11.24%						
110	LGS Overall Change (*)		0.00%		11.22%						
111	Winter Price Below Summer (SUM-WIN)/SUM		14.2%		14.2%						
112	Overall Change				11.22%						
113											
114		Revenue	$148,044,229	$148,306,275	$164,650,793						
115		Change in Revenue			$16,606,565						
116											
117		Proposed change per Revenue Summary			$16,606,615						

	A	B	C	D	E	F	G	H	I	J
1	**KCP&L-MO LARGE GENERAL SERVICE**									
2										
3	**ER-2016-0285**									
4										
5		*INPUT FOR MODEL*								
6		**Cust Chg**	**Current Rates**	**Rates With Increase**	**Proposed Rate**		**Proposed Scenarios**			
7										
8				0.11						
9										
10										
11	A: CUSTOMER CHARGE									
12		0-24 KW	114.38	114.38	126.85					
13		25-199 KW	114.38	114.38	126.85					
14		200-999 KW	114.38	114.38	126.85					
15		1001+ KW	976.54	976.54	1,083.02					
16		Separately Metered Space Heat	2.62	2.62	2.91					
17										
18	B: FACILITIES CHARGE									
19		SECONDARY:	3.272	3.272	3.629					
20		PRIMARY:	2.713	2.713	3.009					
21										
22	C: DEMAND CHARGE									
23		SECONDARY-SUMMER:	6.534	6.534	7.246					
24		SECONDARY-WINTER	3.516	3.516	3.899					
25		PRIMARY-SUMMER	6.386	6.386	7.082					
26		PRIMARY-WINTER	3.436	3.436	3.811					
27		SECONDARY-WINTER - ELEC ONLY	3.256	3.256	3.611					
28		PRIMARY-WINTER - ELEC ONLY	3.179	3.179	3.526					
29										
30	D: ENERGY CHARGE									
31		SECONDARY-SUMMER:								
32		0-180 hrs use per month	0.09596	0.09596	0.10669					
33		181-360 hrs use per month	0.06615	0.06615	0.07363					
34		361+ hrs use per month	0.04260	0.04260	0.04736					
35		SECONDARY-WINTER:	0.00000	-	-					
36		0-180 hrs use per month	0.08818	0.08818	0.09807					
37		181-360 hrs use per month	0.05085	0.05085	0.05666					
38		361+ hrs use per month	0.03580	0.03580	0.03981					
39										
40		PRIMARY-SUMMER:								
41		0-180 hrs use per month	0.09381	0.09381	0.10431					
42		181-360 hrs use per month	0.06457	0.06457	0.07188					
43		361+ hrs use per month	0.04160	0.04160	0.04614					
44		PRIMARY-WINTER:	0.00000	-	-					
45		0-180 hrs use per month	0.08617	0.08617	0.09584					
46		181-360 hrs use per month	0.04963	0.04963	0.05531					
47		361+ hrs use per month	0.03510	0.03510	0.03904					
48										
49		SECONDARY-WINTER - ALL ELECTRIC								
50		0-180 hrs use per month	0.08479	0.08479	0.09431					
51		181-360 hrs use per month	0.04549	0.04549	0.05072					
52		361+ hrs use per month	0.03551	0.03551	0.03949					
53		PRIMARY-WINTER - ALL ELECTRIC	0.00000	-	-					
54		0-180 hrs use per month	0.08301	0.08301	0.09233					
55		181-360 hrs use per month	0.04449	0.04449	0.04961					
56		361+ hrs use per month	0.03483	0.03483	0.03874					
57										
58	E: SEPARATELY METERED S/H-WINTER									
59		SECONDARY	0.05932	0.05932	0.06579					
60		PRIMARY	0.00000	-	-					
61										
62	F: REACTIVE DEMAND ADJUSTMENT		0.821	0.821	0.91052					
64	LGS Secondary		100.00%	0.08%	11.16%					
65	LGS Primary		100.00%	0.27%	11.17%					
66	LGS Overall Change (*)		0.00%	0.11%	11.16%					
67	LGA Secondary		100.00%	0.67%	11.16%					
68	LGA Primary		100.00%	0.00%	11.18%					
69	LGA Winter Energy Overall Change			0.00%	10.15%					
70	LGA Overall Change (*)		0.00%	0.53%	11.16%					
71	Winter Price Below Summer (SUM-WIN)/SUM		28.0%	17.6%	17.5%					
72	Overall Change			0.242%	11.16%					
73										
74		Revenue	$189,041,225	$189,498,426	$210,135,380					
75		Change in Revenue			$21,094,155					
76										
77		Proposed change per Revenue Summary			$21,094,197					
78					($42)					

	A	B	C	D	E	F	G	H	I	J
1	**KCP&L-MO MEDIUM GENERAL SERVICE**									
2										
3	**ER-2016-0285**									
4										
5		*INPUT FOR MODEL*								
6		**Cust Chg**	**Current Rates**	**Rates With Increase**	**PROPOSED RATES**		**Proposed Scenarios**			
7										
8				0.11						
9										
10										
11	A: CUSTOMER CHARGE									
12		0-24 KW	53.21	53.21	59.01					
13		25-199 KW	53.21	53.21	59.01					
14		200-999 KW	108.07	108.07	119.85					
15		1001+ KW	922.75	922.75	1,023.37					
16		Separately Metered Space Heat	2.48	2.48	2.75					
17										
18	B: FACILITIES CHARGE									
19		SECONDARY:	3.092	3.092	3.430					
20		PRIMARY:	2.563	2.563	2.842					
21										
22	C: DEMAND CHARGE									
23		SECONDARY-SUMMER:	4.045	4.045	4.486					
24		SECONDARY-WINTER	2.058	2.058	2.282					
25		PRIMARY-SUMMER	3.951	3.951	4.382					
26		PRIMARY-WINTER	2.009	2.009	2.228					
27		SECONDARY-WINTER - ELEC ONLY	2.914	2.914	3.232					
28		PRIMARY-WINTER - ELEC ONLY	2.851	2.851	3.162					
29										
30	D: ENERGY CHARGE									
31		SECONDARY-SUMMER:								
32		0-180 hrs use per month	0.10573	0.10573	0.11753					
33		181-360 hrs use per month	0.07232	0.07232	0.08048					
34		361+ hrs use per month	0.06099	0.06099	0.06764					
35		SECONDARY-WINTER:								
36		0-180 hrs use per month	0.09136	0.09136	0.10159					
37		181-360 hrs use per month	0.05468	0.05468	0.06091					
38		361+ hrs use per month	0.04586	0.04586	0.05086					
39		PRIMARY-SUMMER:								
40		0-180 hrs use per month	0.10320	0.10320	0.11472					
41		181-360 hrs use per month	0.07069	0.07069	0.07867					
42		361+ hrs use per month	0.05960	0.05960	0.06630					
43		PRIMARY-WINTER:								
44		0-180 hrs use per month	0.08922	0.08922	0.09922					
45		181-360 hrs use per month	0.05342	0.05342	0.05952					
46		361+ hrs use per month	0.04498	0.04498	0.05008					
47		SECONDARY-WINTER - ALL ELECTRIC								
48		0-180 hrs use per month	0.08016	0.08016	0.08917					
49		181-360 hrs use per month	0.04586	0.04586	0.05099					
50		361+ hrs use per month	0.03982	0.03982	0.04416					
51		PRIMARY-WINTER - ALL ELECTRIC								
52		0-180 hrs use per month	0.07836	0.07836	0.08717					
53		181-360 hrs use per month	0.04472	0.04472	0.04973					
54		361+ hrs use per month	0.03907	0.03907	0.04333					
55										
56	E: SEPARATELY METERED S/H-WINTER									
57		SECONDARY	0.05974	0.05974	0.06625					
58		PRIMARY	0.00000	-	-					
59										
60	F: REACTIVE DEMAND ADJUSTMENT		0.775	0.775	0.860					
61	MGS Secondary		100.00%	0.01%	11.13%					
62	MGS Primary		100.00%	0.65%	11.14%					
63	MGS Overall Change (*)		0.00%	0.02%	11.13%					
64	MGA Secondary		100.00%	0.00%	11.11%					
65	MGA Primary		100.00%	0.00%	11.12%					
66	MGA Winter Energy Overall Change			0.00%	10.07%					
67	MGA Overall Change (*)		0.00%	0.00%	11.11%					
68	MGS Secondary-Space Heat		100.00%	0.00%	11.06%					
69	Winter Price Below Summer (SUM-WIN)/SUM		21.6%	21.6%	21.6%					
70	Overall Change			0.01%	11.12%					
71										
72		Revenue	$121,657,901	$121,676,024	$135,191,645					
73		Change in Revenue			$13,533,744					
74										
75		Proposed change per Revenue Summary			$13,533,843					
76					($99)					

	A	B	C	D	E	F	G	H	I	J
1	**KCP&L-MO SMALL GENERAL SERVICE**									
2										
3	**ER-2016-0285**									
4										
5		*INPUT FOR MODEL*								
6		**Cust Chg**	**Current Rates**	**Rates With Increase**	**PROPOSED RATES**		**Proposed Scenarios**			
7										
8				0.11						
9										
10										
11	A: CUSTOMER CHARGE									
12		Metered Service:								
13		0-24 KW	18.37	18.37	20.37					
14		25-199 KW	50.92	50.92	56.47					
15		200-999 KW	103.45	103.45	114.73					
16		1001+ KW	883.30	883.30	979.62					
17		Unmetered Service	7.71	7.71	8.55					
18		Separately Metered Space Heat	2.37	2.37	2.63					
19										
20	B: FACILITIES CHARGE									
21		SECONDARY:	-	-	-					
22		0-25 KW	-	-	-					
23		26+ KW	2.959	2.959	3.282					
24		PRIMARY:	-	-	-					
25		0-26 KW	-	-	-					
26		27+ KW	2.890	2.890	3.205					
27										
28	C: ENERGY CHARGE									
29		SECONDARY-SUMMER:								
30		0-180 hrs use per month	0.16395	0.16395	0.1821					
31		181-360 hrs use per month	0.07779	0.07779	0.0865					
32		361+ hrs use per month	0.06931	0.06931	0.0769					
33		SECONDARY-WINTER:								
34		0-180 hrs use per month	0.12739	0.12739	0.1415					
35		181-360 hrs use per month	0.06220	0.06220	0.0692					
36		361+ hrs use per month	0.05614	0.05614	0.0623					
37										
38		PRIMARY-SUMMER:								
39		0-180 hrs use per month	0.16020	0.16020	0.17794					
40		181-360 hrs use per month	0.07601	0.07601	0.08430					
41		361+ hrs use per month	0.06771	0.06771	0.07509					
42		PRIMARY-WINTER:								
43		0-180 hrs use per month	0.12449	0.12449	0.13833					
44		181-360 hrs use per month	0.06077	0.06077	0.06760					
45		361+ hrs use per month	0.05483	0.05483	0.06081					
46										
47		SECONDARY-WINTER - ALL ELECTRIC								
48		0-180 hrs use per month	0.11668	0.11668	0.12967					
49		181-360 hrs use per month	0.06220	0.06220	0.06898					
50		361+ hrs use per month	0.05614	0.05614	0.06226					
51		PRIMARY-WINTER - ALL ELECTRIC								
52		0-180 hrs use per month	0.11402	0.11402	0.12672					
53		181-360 hrs use per month	0.06077	0.06077	0.06740					
54		361+ hrs use per month	0.05483	0.05483	0.06081					
55										
56	D: SEPARATELY METERED S/H-WINTER									
57		SECONDARY	0.06822	0.06822	0.07566					
58		PRIMARY	-	-	-					
59	SGS Secondary		100.00%	100.01%	111.07%					
60	SGS Primary		100.00%	100.00%	111.03%					
61	SGS Overall Change (*)		0.00%	0.01%	11.08%					
62	SGA Secondary		100.00%	100.00%	111.06%					
63	SGA Primary		100.00%	#DIV/0!	#DIV/0!					
64	SGA Winter Energy Overall Change			0.00%	11.07%					
65	SGA Overall Change (*)		0.00%	0.00%	11.06%					
66	SGS Secondary Space Heat		100.00%	100.00%	111.02%					
67	SGS Secondary Unmetered		0.00%	#DIV/0!	#DIV/0!					
68	Winter Price Below Summer (SUM-WIN)/SUM		18.5%	18.5%	18.5%					
69	Overall Change			0.01%	11.08%					
70			E:\Regulatory\COS\16-ClassCOS\KCPL-MO Rate Design\Direct Testimony Schedules & Wpss\Wps\[MO SGS (SGS-SGA).xls]RATE SUMMARIES							
71		Revenue	$55,207,502	$55,210,833	$61,322,320					
72		Change in Revenue			$6,114,818					
73										
74		Proposed change per Revenue Summary			$6,114,851					
75					($33)					

	A	B	C	D	E	F	G	H	I
1	**KCP&L-MO RESIDENTIAL**								
2									
3	**ER-2016-0285**								
4									
5		*INPUT FOR MODEL*							
6	**Cust Chg**	**Current Rates**	**Rates With Increase**	**Proposed Rates**		**Proposed Scenarios**			
7									
8			0.11						
9									
10	**CUSTOMER CHARGE**								
11	One Meter	11.88	11.88	13.18					
12	Two Meters - Standard	11.88	11.88	13.18					
13	Two Meters - Additional	2.25	2.25	2.50					
14		14.13	14.13	15.67					
15	**ENERGY CHARGE**								
16	**Summer Rate**								
17	0-600	0.13328	0.13328	0.14781					
18	600-1000	0.13328	0.13328	0.14781					
19	1000+	0.13328	0.13328	0.14781					
20	**Winter Rates**								
21	Winter Gen - RESA/RESC								
22	0-600	0.11982	0.11982	0.13289					
23	600-1000	0.07183	0.07183	0.07966					
24	1000+	0.06003	0.06003	0.06658					
25	Winter Gen&S/H - RESB								
26	0-600	0.09367	0.09367	0.10388					
27	600-1000	0.09367	0.09367	0.10388					
28	1000+	0.05887	0.05887	0.06529					
29	Sep Space Heat Mtr								
30	Winter	0.06023	0.06023	0.06680					
31	Summer	0.13328	0.13328	0.14781					
32	**Other Use**								
33	Winter	0.13450	0.13450	0.14917					
34	Summer	0.17310	0.17310	0.19198					
35	**T-O-U (RTOD)**								
36	Customer Charge	15.39	15.39000	17.07					
37	Summer On-Peak	0.20439	0.20439	0.22668					
38	Summer Off-Peak	0.11387	0.11387	0.12629					
39	Winter	0.08417	0.08417	0.09335					
40									
41	**SmartGrid TOU**								
42	Summer On-Peak	0.4149	0.41486	0.46010					
43	Summer Off-Peak	0.0692	0.06918	0.07672					
44	Winter TOU-General Use								
45	0-600	0.10869	0.10869	0.12054					
46	600-1000	0.06518	0.06518	0.07229					
47	1000+	0.05447	0.05447	0.06041					
48	Winter TOU-General Use and Space Heat								
49	0-1000	0.08093	0.08093	0.08975					
50	1000+	0.05341	0.05341	0.05923					
51									
52	Factor RESA	100.00%	100.00%	110.90%					
53	Factor RESA - Winter	100.00%	100.00%	110.91%					
54	Factor RESB	100.00%	100.00%	110.90%					
55	Factor RESB - Winter	100.00%	100.00%	110.90%					
56	Factor RESC	100.00%	100.00%	110.90%					
57	Factor RESC - Winter	100.00%	100.00%	110.91%					
58	Factor T-O-U	100.00%	100.00%	110.91%					
59	Overall Change (*)	100.00%	0.00%	10.90%					
60	Winter Price Below Summer (SUM-WIN)/SUM	28.8%	28.8%	28.8%					
61									
62	Revenue	$315,080,525	$315,080,735	$349,437,621					
63	Change in Revenue			$34,357,096					
64									
65	Design Revenue per Revenue Summary			$34,357,101					
66				($5)					

	A	B	C	D
1	**KCPL-MO Proposed Non-Rate Tariff Revisions - ER-2016-0285**			
2	**Schedule**	**Sheet No.**	**Proposed Change**	**Support**
3	Table of Contents	TOC-1	Updated language to include the Thermal Storage Rider and Public Electric Vehicle Charging Station Service.	The Company is proposing: (1) to adjust the language within the Table of Contents to incorporate both the proposed Public Electric Vehicle Charging Station Service and the present Thermal Storage Rider. Currently, Sheet No. 22 within the tariff holds the Company's Thermal Storage Rider and was marked "Reserved for Future Use," within the Table of Contents.
4		TOC-2	Updated language to include the Public Electric Vehicle Charging Station Service.	The Company is proposing: (1) to adjust the language within the Commercial & Industrial section of the Table of Contents to incorporate the newly proposed Public Electric Vehicle Charging Station Service.
5		TOC-2A	Updated language to include the Thermal Storage Rider.	The Company is proposing: (1) to adjust the language within the Riders & Surcharges section of the Table of Contents to include the Thermal Storage Rider.
6	Residential Other Use	6	Removed Summer and Winter above Customer Charge.	The Company is proposing: (1) to remove the differentiation of Summer and Winter for the Customer Charge given the Customer Charge is the same for both Summer and Winter.
7	Public Electric Vehicle Charging Station Service	24, 24A, 24B	Utilize Sheet Nos. 24, 24A, and 24B to incorporate the new Schedule CCN.	The Company is proposing: (1) to remove the "Reserved for Future Use" from Sheet Nos. 24, 24A, and 24B in order to utilize each for tariff language of the newly proposed Public Electric Vehicle Charging Station Service.
8	Economic Relief Pilot Program	43Z.1	Corrected a spelling error within the header.	The Company is proposing: (1) to correct a spelling error found within the header of Sheet No. 43Z.1 showing a (space) was missing between 'Revised' and 'Sheet'. Correction of this change will ensure that Sheet No. 43Z.1 is consistent with the remainder of the tariff.
9	FAC	50, 50.1, 50.2, 50.3, 50.4, 50.5, 50.6, 50.7, 50.8, 50.9	Updated the header information.	The Company is proposing: (1) to resubmit the current FAC tariff identified on Sheet Nos. 50, and 50.1 - 50.9 with an update to the language within the subtitle of each making them applicable for service provided from September 29, 2015 through the effective date of the proposed ER-2016-0285 rate case, as these are the FAC rules and rates currently in effect. Because of the way the FAC is structured, these tariff sheets will remain active and in effect until the recovery and accumulation periods have run out and a prudence review has been conducted by the Commission Staff.

	A	B	C	D
1	**KCPL-MO Proposed Non-Rate Tariff Revisions - ER-2016-0285**			
2	**Schedule**	**Sheet No.**	**Proposed Change**	**Support**
10		50.11, 50.12, 50.13, 50.14, 50.15, 50.16, 50.17, 50.18, 50.19, 50.20, 50.21	Original documents being implemented into the KCP&L-MO tariff.	The Company is proposing: (1) to submit a new set of Original tariff sheets 50.11 through 50.21 as part of our ER-2016-0285 Rate Case that will include new language presently not contained within the Company FAC (50, 50.1 - 50.10) that will better define the FERC accounts impacted by the FAC and allow for the FAC to be more consistent with the recently submitted KCP&L-GMO (ER-2016-0156) Rate Case FAC tariff; and (2) to include new language re-calculating the FAC Rate Base to reflect current fuel and fuel handling costs as well as an inclusion of transmission costs into the FAC since these costs are directly linked to the Company's fuel and purchased power requirements and can vary significantly from year-to-year.
11				

	A	B	C	D
1	**KCPL-MO Proposed Rules & Regulation Revisions Tariff Revisions - ER-2016-0285**			
2	**Section**	**Rule & Sheet No.**	**Proposed Change**	**Support**
3	Table of Contents	Sheet No. 1.04	Updated language within the Table of Contents to reflect changes made to Rule 10.03.	The Company is proposing to: (1) update the language within the Table of Contents to incorporate a change to the beginning of Rule 10.03 from Sheet No. 1.33B to Sheet No. 1.33A as a result of efforts made by the Company to clean-up its tariff.
4	Metering	Rule 6.09(E) on Sheet No. 1.24A	Update language in Rule 6.09(E) to refer the Customer to Rule 4.10 and not Rule 5.04(D) and added language to the existing Rule 6.09(E).	In order to fully reflect tariff revisions intended in Case No. ER-2014-0370, the Company is proposing: (1) to update the language of Rule 6.09(E) to reference the current period a customer may elect to pay any billing adjustment found based on a Customer being undercharged to at least double the period of time covered by the adjusted bill; and (2) to change the reference of Rule 5.04(D) to Rule 4.10 as it pertains to tampering of Company facilities.
5	Billing and Payment	Rule 8.09 on Sheet No. 1.28	Change made to Non-MEEIA rate.	The Company is proposing: (1) to update its current Non-MEEIA rate that customers will receive on their bill if they opt-out of the Non-MEEIA rate.
6	Extension Policy	Rule 9.01 on Sheet Nos. 1.31 and 1.32	Updated language in Rule 9.01 to allow for some flexibility in the single family residential line extension policy.	The Company is proposing: (1) to mirror the language of the previously filed KCP&L-GMO Rate Case (ER-2016-0156) as a way to bring consistency throughout all Company territories; (2) to update the language of Rule 9.01 to be more general with the terminology so as to favor the Customer by allowing some flexibility of how to achieve a "Free of Charge" extension; and (3) to reformat both Sheets 1.31 and 1.32 with respect to efforts made by the Company to clean up its tariff.
7	Underground Distribution Policy	Rule 10.02(d) on Sheet Nos. 1.33 and 1.33A	Reformat of Rule 10.02(d) to no longer be on Sheet No. 1.33A and updates made to the language referring a Customer to sections of the Company's Electric Service Standards.	In order to ensure that all references regarding underground primary and secondary distribution facilities are the same throughout each territory, the Company is proposing: (1) to update the language of Rule 10.02(d) and refer the reader to specific sections within the Company's Electric Service Standards; and (2) to open Sheet No. 1.33A for additional efforts made by the Company to clean up its tariff.
8		Rule 10.03(a) on Sheet Nos. 1.33B and 1.33C	Reformat of Rule 10.03(a) to begin on Sheet No. 1.33A and an update to the language of Rule 10.03(a)(iv) on top of adding a Rule 10.03(a)(ix) that defines the Company's Electric Service Standards.	The Company is proposing: (1) to reformat Rule 10.03 and Rule 10.03(a) so that both may begin on Sheet No. 1.33A instead of Sheet No. 1.33B; (2) to update the language of Rule 10.03(a) so that the Company may remain consistent throughout all its territories by redefining a Subdivision within Rule 10.03(a)(iv) as land divided into "five" or more lots instead of "two" or more; and (3) to reformat Rule 10.03(a) to include a Rule 10.03(a)(ix) defining the Company's Electric Service Standards and inform a Customer where they may find the document on the Company's website.

	A	B	C	D
1	**KCPL-MO Proposed Rules & Regulation Revisions Tariff Revisions - ER-2016-0285**			
2	**Section**	**Rule & Sheet No.**	**Proposed Change**	**Support**
9		Rule 10.03(b) on Sheet No. 1.33D	Reformat of Rule 10.03(b) to begin on Sheet No. 1.33C.	The Company is proposing: (1) to reformat Rule 10.03(b) so that it may begin on Sheet No. 1.33C instead of Sheet No. 1.33D to facilitate efforts made by the Company to clean up its tariff.
10		Rule 10.03(c) on Sheet Nos. 1.33E, 1.33F, 1.33G, 1.33H, and 1.33I	Reformat of Rule 10.03(c) to begin on Sheet No. 1.33D and updates to the existing language of Rules 10.03(c)(i)(1)(A - B), 10.03(c)(i)(2), and 10.03(c)(ii - vi) to include a reference of specific sections in the Company's Electric Service Standards.	The Company is proposing: (1) to reformat Rule10.03(c) to begin on Sheet No. 1.33D instead of Sheet No. 1.33E with respect to efforts made by the Company to clean up its tariff; and (2) to update the language within Rules 10.03(c)(i)(1)(A - B), Rule 10.03(c)(i)(2), and Rules 10.03(c)(ii - iii) to include language that refers a reader to specific sections within the Company's Electric Service Standards to ensure consistency throughout all Company territories.
11		Rule 10.03(d) on Sheet Nos. 1.33I and 1.33J	Reformat of Rule 10.03(d) to begin on Sheet No. 1.33G and updates to the existing language of Rules 10.03(d)(i - iv) to ensure consistency throughout all Company territories.	The Company is proposing: (1) to reformat Rule 10.03(d) to begin on Sheet No. 1.33G instead of Sheet No. 1.33I with respect to efforts made by the Company to clean up its tariff; and (2) to update and reformat the language within Rules 10.03(d)(i - iv) to bring consistency throughout all Company territories.
12		Rule 10.03(e) on Sheet Nos. 1.33J and 1.33K	Reformat of Rule 10.03(e) to begin on Sheet No. 1.33H and an update to the language of Rules 10.03(e)(i-v) to include a reference of specific sections in the Company's Electric Service Standards.	The Company is proposing: (1) to reformat Rule 10.03(e) to begin on Sheet No. 1.33H instead of Sheet No. 1.33J with respect to efforts made by the Company to clean up its tariff; (2) to update the language within Rules 10.03(e)(i - iv) so that a reference is made to guide a Customer to the Company's Electric Service Standards; and (3) to reformat the language within Rule 10.03(e)(v) to Rule 10.03(e)(ii).
13		Rule 10.03(f) on Sheet No. 1.33K and Rule 10.03(g) on Sheet No. 1.33L	Reformat of both Rules 10.03(f - g) to begin on Sheet No. 1.33I.	The Company is proposing: (1) to reformat Rules 10.03(f - g) to both begin on Sheet No. 1.33I instead of either Sheet Nos. 1.33K and 1.33L to facilitate a clean up of its tariff.
14		Rule 10.03(h) on Sheet No. 1.33L	Removal of language.	The Company is proposing to: (1) remove the language within Rule 10.03(h) as given changes in other Sections of the Rule 10.03 address more relevantly.
15		Sheet No. 1.33J, 1.33K, 1.33L	Mark as "Reserved For Future Use."	The Company is proposing: (1) to mark these sheets as, "Reserved For Future Use," to facilitate the reformatting of current language within these tariff sheets and the remainder of Rule 10.03.

KCP&L - Missouri Jurisdiction Class Revenue - For Direct filing - ER-2016-0370

(A)	(K)	(B)	(C)	(D)	E=(B-C)	F=(E * 10.9%) 10.90%	(E+F
MISSOURI RATE GROUP	kWh	Revenue from Existing Rates (Including DSIM, EDR)	DSIM Adjustments	EDR credits & Misc.*	Revenue from Existing Rates less DSIM adjustments	Request Increase- Excluding EDR gross-up (excl lighting)	Proposed Revenue
LARGE POWER TOTAL	2,038,230,106	$ 149,408,547	$ 3,529,772	$ (2,165,455)	$ 145,878,774	$ 15,906,955	$ 161,785,729
LARGE GEN SVC TOTAL	2,111,680,530	$ 194,716,422	$ 6,436,560	$ (761,362)	$ 188,279,863	$ 20,530,467	$ 208,810,329
MEDIUM GEN SVC TOTAL	1,177,222,033	$ 125,290,276	$ 3,663,276	$ (30,900)	$ 121,627,000	$ 13,262,486	$ 134,889,487
SMALL GEN SVC TOTAL	416,877,926	$ 56,524,267	$ 1,318,256	$ (1,491)	$ 55,206,011	$ 6,019,790	$ 61,225,801
RESIDENTIAL TOTAL	2,538,324,789	$ 322,006,343	$ 6,927,513	$ (1,695)	$ 315,078,830	$ 34,356,916	$ 349,435,746
MO Metered TOTALS	**8,280,335,384**	**$ 847,945,856**	**$ 21,875,377**	**$ (2,960,903)**	**$ 826,070,479**	**$ 90,076,613**	**$ 916,147,092**
MO Lighting TOTAL**:	85,231,784	$ 10,506,822	$ -		$ 10,506,822		$ 10,506,822
MO TOTAL	**8,365,567,168**	**$ 858,452,678**	**$ 21,875,377**	**$ (2,960,903)**	**$ 836,577,301**	**$ 90,076,613**	**$ 926,653,914**

*Misc. Included a move of BD actuals to RCS A and RCS B rates.

**No increase for Lighting.

KCP&L - Missouri Jurisdiction Class Revenue - For Direct filing - ER-2016-0370

(A)	(K)	(B)	(C)	(D)	E=(B-C)	F=(E * 10.9%) 10.90%	(J)	(E+J)
MISSOURI RATE GROUP	kWh	Revenue from Existing Rates (Including DSIM, EDR)	DSIM Adjustments	EDR credits & Misc.*	Revenue from Existing Rates less DSIM adjustments	Request Increase-Excluding EDR gross-up (excl lighting)	Adjusted Request Increase-FAC Impact	Proposed Revenue
LARGE POWER TOTAL	2,036,230,106	$ 149,408,547	$ 3,529,772	$ (2,165,455)	$ 145,878,774	$ 15,906,955	9,237,760	$ 155,116,534
LARGE GEN SVC TOTAL	2,111,880,530	$ 194,716,422	$ 6,436,560	$ (761,382)	$ 188,279,863	$ 20,530,467	13,616,203	$ 201,896,066
MEDIUM GEN SVC TOTAL	1,177,222,033	$ 125,290,276	$ 3,663,276	$ (30,900)	$ 121,627,000	$ 13,262,486	9,383,413	$ 131,010,414
SMALL GEN SVC TOTAL	416,877,926	$ 56,524,267	$ 1,318,256	$ (1,491)	$ 55,206,011	$ 6,019,790	4,610,371	$ 59,816,382
RESIDENTIAL TOTAL	2,538,324,789	$ 322,006,343	$ 6,927,513	$ (1,695)	$ 315,078,830	$ 34,356,916	26,056,880	$ 341,135,710
MO Metered TOTALS	**8,280,335,384**	**$ 847,945,856**	**$ 21,875,377**	**$ (2,960,903)**	**$ 826,070,479**	**$ 90,076,613**		**$ 888,975,106**
MO Lighting TOTAL**:	85,231,784	$ 10,506,822	$ -		$ 10,506,822			$ 10,506,822
MO TOTAL	**8,365,567,168**	**$ 858,452,678**	**$ 21,875,377**	**$ (2,960,903)**	**$ 836,577,301**	**$ 90,076,613**	**$ 62,904,627**	**$ 899,481,928**

*Misc. included a move of BD actuals to RES A and RES B rates.

**No increase for Lighting.

Exhibit No.:
Issue: Customer Growth, Energy Efficiency Adjustment and Historical and Projected Customer Usage
Witness: Albert R. Bass, Jr.
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Kansas City Power & Light Company
Case No.: ER-2016-0285
Date Testimony Prepared: January 27, 2017

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2016-0285

SURREBUTTAL TESTIMONY

OF

ALBERT R. BASS, JR.

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

Kansas City, Missouri
January 2017

[redacted] **Designates "Highly Confidential" Information.**
All Such Information Should Be Treated Confidentially
Pursuant To 4 CSR 240-2.135.

SURREBUTTAL TESTIMONY

OF

ALBERT R. BASS, JR.

Case No. ER-2016-0285

Q: Please state your name and business address.

A: My name is Albert R. Bass, Jr. My business address is 1200 Main, Kansas City, Missouri 64105.

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

A: I am employed by Kansas City Power & Light Company ("KCP&L" or "Company") as Manager of Market Assessment.

Q: On whose behalf are you testifying?

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

Q: Are you the same Albert R. Bass, Jr. who filed Direct and Rebuttal Testimony in this proceeding?

A: Yes, I am.

Q. What is the purpose of your surrebuttal testimony?

A: The purpose of my surrebuttal testimony is to respond to Missouri Public Service Commission ("Commission" or "MPSC") Staff's rebuttal testimony 1) Matthew R. Young's adjustment for Customer Growth, 2) Michael L. Stahlman's conclusion on Energy Efficiency Adjustment To Billing Determinants and 3) the Office of the Public Counsel ("OPC") rebuttal testimony of Geoff Marke's conclusions on historical & projected customer usage.

I. CUSTOMER GROWTH

Q: Please summarize Staff witness Young's rebuttal on customer growth.

A: Mr. Young sates the revenue adjustment for customer growth in Staff's Direct filing will be revised in the true-up filing after receiving customer information provided by Company in DR 0237T.

Q: Does the Company agree with Staff witness Mr. Young's rebuttal on customer growth?

A: Yes. Company agrees the data used by Staff in its Direct filing to calculate customer growth does not accurately represent the actual rate of customer growth.

Q: Do you agree with Mr. Young that it should be revised?

A: Yes.

Q: Has Company changed its methodology in calculating customer growth?

A: No. Company is using same methodology employed in previous rates cases.

II. ENERGY EFFICIENCY ADJUSTMENT TO BILLING DETERMINANTS

Q: What energy efficiency kWh savings were used in Company's calculated revenues?

A: Both MEEIA Cycle 1 and Cycle 2 kWh savings where included in the Company's revenue adjustment.

Q: What are Mr. Stallman's concerns on the energy efficiency adjustment to billing determinants?

A: Staff believes that MEEIA Cycle 1 programs are not part of the stipulation and agreement filed in KCP&L's MEEIA Cycle 2 docket, in case No. EO-2015-0240.

Q: Does the Company agree with Staffs assertion that MEEIA Cycle 1 programs should not be included?

A: No.

Q: Is the issue of including MEEIA Cycle 1 programs addressed elsewhere in Company testimony?

A: Yes. Please see the rebuttal and surrebuttal testimony of Tim Rush.

III. HISTORICAL & PROJECTED CUSTOMER USAGE

Q: Does the Company have an issue with OPC witness Marke's rebuttal testimony?

A: Yes, Mr. Marke states "Mr. Bass's position on GMO's most recent weather normalized billed sales and what he believes is likely GMO's projected future" is incorrect. My testimony in this case is in regards to KCP&L. Given that this rebuttal testimony is concerning KCP&L, one must draw the conclusion Mr. Marke is referencing the discussion of the decline in average used in the KCP&L direct testimony rather than the GMO direct testimony.

Q: What are the Company's concerns with OPC's rebuttal testimony regarding historical and projected customer usage?

A: OPC witness Geoff Marke states that he agrees with only some of the Company's assertions that continued lag from the recession, federal appliance standards, Company energy efficiency programs, a stagnant single family housing market and increasing prices are continuing to have an impact on Company's kWh sales. Mr. Marke asserts that these factors may have some impact, but is more inclined to believe they are minimal and that Company's energy efficiency programs have not significantly impacted the Company's recent historical trend in sales. Rather, Mr. Marke contends that the Company

is experiencing low growth compared to pre-recessionary levels and that future growth is uncertain based on uncertainty in the weather and economy. Mr. Marke does not explain how his description of growth in customer usage differs from that of the Company, rather treating it as a statement without elaboration.

The Company does not agree with these assertions. Mr. Marke offers no evidence directly countering the Company's statement that Company sponsored energy efficiency programs have reduced customer usage; nor does he offer evidence to counter the Company's expectation that Company kWh sales growth will not return to the rates seen prior to the housing market collapse and recession occurring in and around 2008. Mr. Marke only offers recent growth in quarterly earnings and sales as evidence that there is uncertainty in weather and the economy. The Company is experiencing [redacted] kWh sales growth well below the level of growth the Company experienced before the recession, housing market collapse and implementation of energy efficiency programs.

Q: Please summarize the testimony offered by Mr. Marke regarding the uncertainty in future electricity retail growth?

A: Mr. Marke offers the following as evidence:

1) Great Plains Energy (GPE) year-over-year $0.14 increase in earnings per share and 3.4 percent increase in retail MWh sales in 2016 second quarter due to a 31 percent increase in cooling degree days compared to the second quarter 2015.
2) GPE year-over-year $0.05 increase in earnings per share and 3.2 percent increase in retail MWh sales in 2016 third quarter driven by a 7 percent increase in cooling degree days compared to the third quarter 2015.

HIGHLY CONFIDENTIAL

3) GPE 0.3% growth in weather normalized MWh sales 2016 third quarter YTD, including 1.2% Residential, -0.1% Commercial, -0.6% Industrial.

Additionally, Mr. Marke cites two climate change articles as evidence for this statement, "Whether this heat wave represents an anomaly or if more erratic weather patterns are likely to occur can be just as reasonably debated as whether or not the economy will bounce back and induce increased consumption."

In concluding that the future of customer usage is uncertain, Mr. Marke does not provide evidence to directly counter the rationale behind the Company's belief that usage will not return to previous rates of growth.

Q: Does the Company agree with Mr. Marke?

A: No. There are several areas where the Company does not agree with his conclusions.

First, Mr. Marke bases his arguments on GPE level earnings, revenue, and growth.

GPE is comprised of three jurisdictions and each can contribute differently to the GPE total. One cannot conclude that if GPE is experiencing growth that all three jurisdictions are following the same trend. Additionally, kWh customer usage and the Company's earnings are not perfectly correlated. Total revenue is derived from the price charged per customer, kWh usage, and customer charge. There are several different rate tariffs for different customer and within those tariffs, there are different rate structures for summer and winter seasons; the application of these rate components may result in total revenue and total kWh customer usage growing at similar or dis-similar rates for any given time period. Given both of these points, GPE earnings and revenue should not be used as a

primary source of evidence when deriving a conclusion on the future trend in customer usage.

Second, the Company quarterly results employed by Mr. Marke in his argument include weather. Historically, weather is highly irregular over a short-term period (e.g. a single test year), but much less variable over a long-term (e.g. 30 years). The short-term variability may have a positive or negative impact on energy consumption. For this reason, kWh sales used in rate base making are weather normalized. The variability in the weather is removed to see a clearer picture of the true growth trend. Additionally, while Mr. Marke cites two articles on climate change in order to contend that the warm weather cited in GPE earnings may continue, those references primarily discuss changes that may occur over the course of a "few decades" or by the end of the century, but not in the immediate future.

Third, while Mr. Marke's statement that GPE's 12-months ending September 30, 2016 growth is 0.3% based on its third quarter 2016 earnings presentation. Fourth quarter weather normalized results ending December 31, 2016 shows KCP&L MO jurisdictional kWh retail sales [redacted] by [redacted] and the weather normalized KCP&L MO jurisdictional retail average use per customer 4th Qtr. results ending December 31, 2016 shows a [redacted] of [redacted].The weather normalized KCP&L MO retail kWh sales 12-months ending December 31, 2016 shows KCP&L MO jurisdictional kWh retail sales [redacted] by [redacted] and the weather normalized KCP&L MO jurisdictional retail average use per customer 12-month ending December 31, 2016 shows a [redacted] of [redacted]. This is a very different picture than what Mr. Marke would lead you to believe by using GPE third quarter 2016 earnings.

HIGHLY CONFIDENTIAL

Fourth, Mr. Marke states "I am much less inclined to agree the Company's energy efficiency efforts have significantly impacted KCP&L's recent historical trend." Mr. Marke does not believe there is a significant impact on customer usage from the Company energy efficiency programs and appears to disagree that federal standards have a significant impact on customer usage. If neither of these impact customer usage, there would need to be an alternative explanation for the decline in Company's use per customer.

Table 1 - KCP&L MO

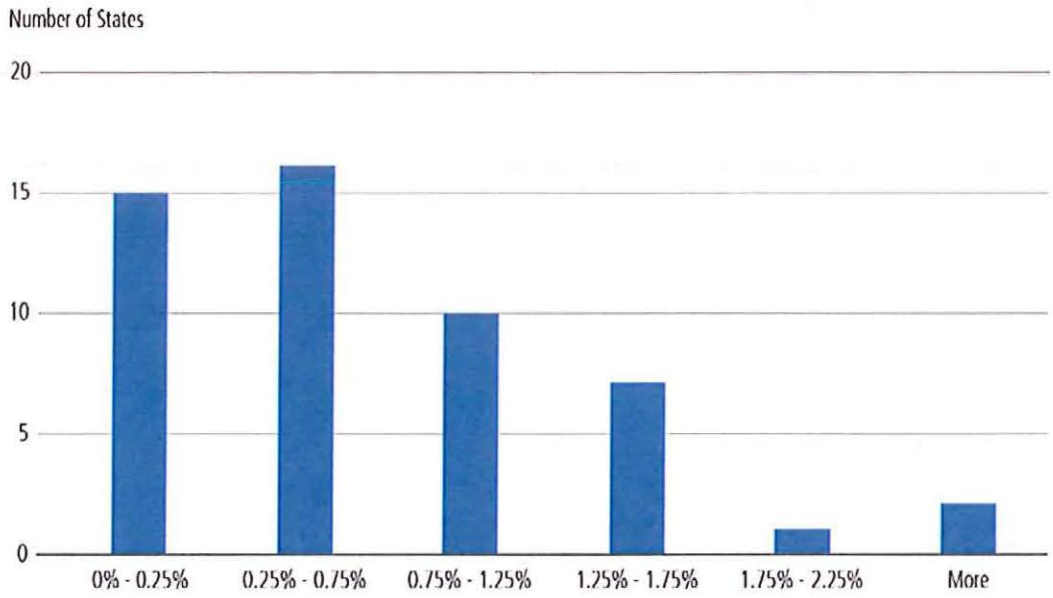
	Customers	Average Use
2015	1.1%	-0.7%
2016	[redacted]	[redacted]

Table 1 shows that KCP&L MO has seen greater than 1% customer growth the last two years while weather normalized average use has [redacted] Over the past several years the Department of Energy has aggressively implemented federal standards that impact the appliances consumers use on a daily basis. In addition, the Company has implemented its own energy efficiency programs, which have reduced KCP&L's weather normalized kWh sales by approximately [redacted] in 2015 and 2016 [1]. These savings are in line with energy efficiency programs sponsored by other utilities throughout the United States. Figure 1 shows nearly a third of company-sponsored energy efficiency programs in the United States are achieving savings of near 1% or more per year and another third of the states are saving between 0.25% and 0.75% of retail sales[2]. The national savings reported in 2014 was equal to 0.7% of sales. The savings produced by

[1] The estimation of MEEIA savings is derived through the calculation of monthly kWh sales results, based on savings from customer participation in MEEIA programs.
[2] Quadrennial Energy Review "Transforming the Nation's Electricity System: The Second Installment of The QER, January 2017, Pg. 2-29.

the Company's programs are within the range most commonly realized by other electric utilities.

Figure 1: Percent Electricity Savings in 2014 from Energy Efficiency Programs Funded by Utility Customers.



Q: Has OPC supported the Company's MEEIA programs?

A: Yes. OPC is a member of the Demand Side Advisory Group (DSMAG) which reviews the performance of the Company's MEEIA programs. As a member, OPC received and reviewed the Evaluation, Measurement and Verification (EM&V) of the Company's MEEIA programs which verified a total energy savings of 189.0 MWh for Cycle 1. OPC has also signed the Non –Unanimous Stipulation and Agreement dated November 23, 2015 supporting the Company's MEEIA Cycle 2 energy efficiency programs which is targeting 198.1 MWh of savings over the three year period April 2016 through March 2019.

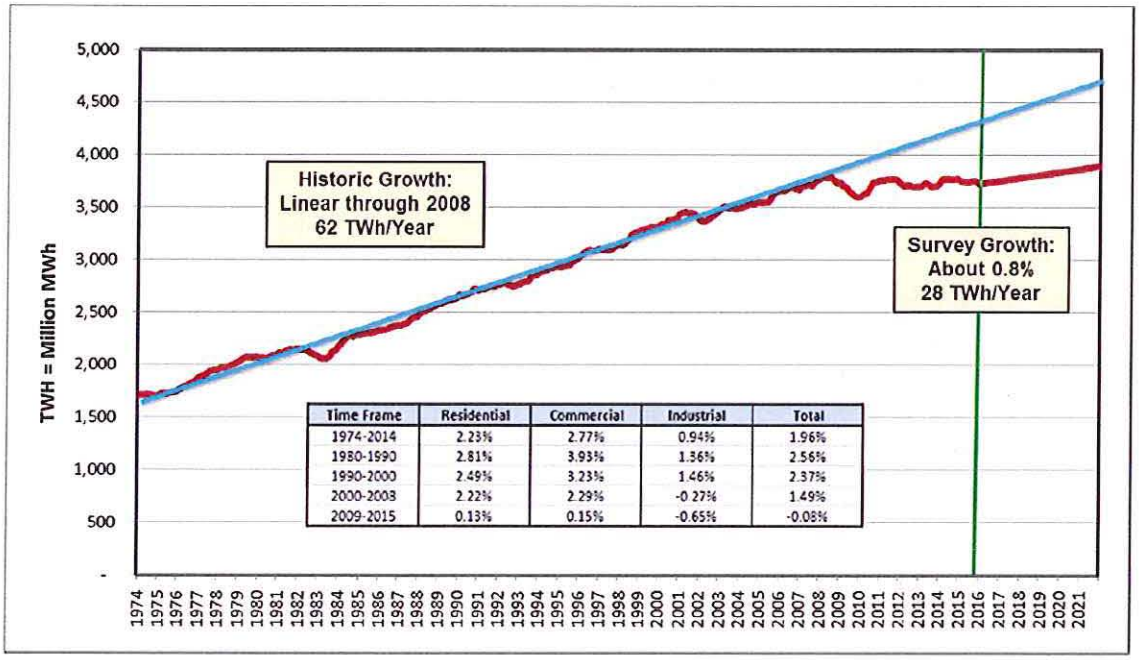
Q: Does the Company agree there is uncertainty in future electricity sales growth?

A: Yes. However, this does not mean a reasonable estimate should be discarded.

Q: Do other electric utilities expect growth in customer usage to return to previous rates?

A: No. The majority of electric utility forecasters in the United States expect customer usage growth to remain at rates lower than those seen prior to 2008. Figure 3 shows historical electricity kWh sales from 1974 through 2015 with forecast kWh sales based on the survey projections as well as consensus near-term projections of 62 electric utilities belonging to the Energy Forecasting Group (EFG) sponsored by Itron[3]. Beginning with the "Great Recession" in 2008, sales for KCP&L and other utilities have deviated from the long-term trend line. Since 2008, kWH sales have been flat in spite of some economic recovery. With this continued deviation in trend, utilities are no longer expecting to return to the previous long-term trend.

Figure 3: EFG Survey of U.S. Electric Sales Growth



Time Frame	Residential	Commercial	Industrial	Total
1974-2014	2.23%	2.77%	0.94%	1.96%
1980-1990	2.81%	3.93%	1.36%	2.56%
1990-2000	2.49%	3.23%	1.46%	2.37%
2000-2008	2.22%	2.29%	-0.27%	1.49%
2009-2015	0.13%	0.15%	-0.65%	-0.08%

[3] 2016 Forecasting Benchmark Survey, Itron, Inc., October 2016

Q: Does the Company believe federal efficiency standards continue to impact customer usage?

A: Yes. The U.S. Appliance Standards Program now includes over sixty products which cover 90% of residential energy use, 60% of commercial energy use, and 30% of industrial energy use. The annual utility bill savings for consumers from the federal standards program amounts to over $58 billion per year or nearly a $250 per household per year savings on their bill. The U.S. Department of Energy (DOE) states "The cumulative energy savings of standards promulgated to date will be about 70 quadrillion British thermal units (quads) of energy through 2020, and will amount to nearly 128 quads through 2030 – more than 1 years' worth of US energy use". The impacts of federal standards can be seen by looking at a typical air conditioner. A typical air conditioner today uses about 50% less energy than a typical 1990 model and air conditioners have become even more efficient in the last 5 years[4]. To put that in perspective, the results from KCP&L 2016 appliance saturation survey shows 26% of residential KCP&L customers have replaced their primary cooling unit in the last five years and 31% of KCP&L commercial customers have implemented cooling and heating efficiency measures in the past three years. This results in a decline in summer loads today and in the future. The decline in average use is both a result of the federal standards and company sponsored energy efficiency programs (such as the air conditioner rebate program) and lead to the continued decline in average use per customer.

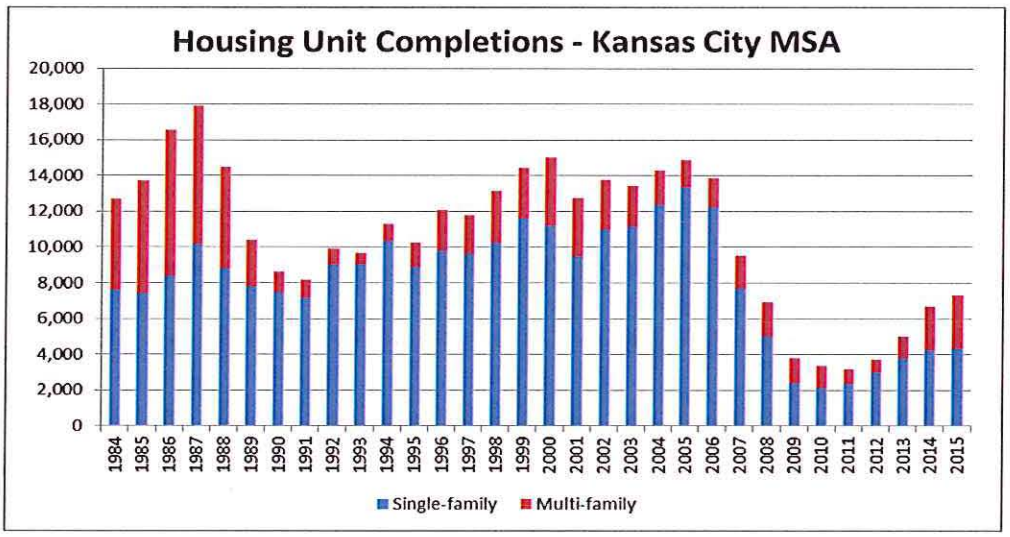
[4] "The U.S. Appliance Standards Program, John Cymbalsky, Department of Energy, Presented at the Annual Energy Forecasting Meeting, 2015.

Q: Does the Company believe customer usage continues to be impacted by the recession?

A: Yes. While there are likely many lingering effects from the recession in the electric utility industry, two are clear (1) growth in households has shifted from single-family units to multi-family units and (2) economic output is reduced.

First, The Kansas City metro housing market has yet to fully recover from the recession and housing bust, resulting in fewer single-family housing units being built. To date, the housing market recovery has been driven primarily by multi-family units (Figure 2) which have a lower average electricity usage. An average multi-family unit uses 48% less electricity than a single-family unit. Even with customer growth above 1%, average use per customer continues to decline from smaller more efficient housing units.

Figure 2: Kansas City MSA Housing Unit Completions[5]



[5] U.S Census Bureau; Moody's Analytics. Housing Completions: Single-family and Multi-family (# of units, SAAR) for Kansas City, MO-KS

Second, Kansas City Gross Metro Product (GMP) has been below 1% twenty five times in the past thirty years from 1986 to 2015 with thirteen of them occurring since fourth quarter 2008. Dampened output results in stagnant commercial and industrial sales. The impact of this can be seen in the growth rate of commercial and industrial ("C&I") customers. KCP&L MO experienced an annualized growth rate of 0.80% in C&I customers from 2000-2008, but has since experienced an annualized growth rate of 0.03% in C&I customers 2008-2016. Further, at a national level, the historical pace of U.S. electricity consumption growth has declined alongside GDP, but at a faster rate.

Q: Does the Company agree with Mr. Marke conclusion on the adjustment the Company made for energy efficiency programs?

A: No. Please refer to the rebuttal and surrebuttal testimony of Tim Rush.

Q: Does that conclude your testimony?

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-2016-0285

AFFIDAVIT OF ALBERT R. BASS, JR.

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Albert R. Bass, Jr., being first duly sworn on his oath, states:

1. My name is Albert R. Bass, Jr. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Manager of Market Assessment.

2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Kansas City Power & Light Company consisting of twelve (12) 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.

Albert R. Bass, Jr.

Subscribed and sworn before me this 27th day of January 2017.

Notary Public

My commission expires: Feb. 4, 2019

NICOLE A. WEHRY
Notary Public - Notary Seal
State of Missouri
Commissioned for Jackson County
My Commission Expires: February 04, 2019
Commission Number: 14391200