

Exhibit No.:
Issue: Weather Normalization; Customer
Annualization of Unit Sales
Witness: Albert R. Bass, Jr.
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

ALBERT R. BASS, JR.

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

**Kansas City, Missouri
July 2016**

DIRECT TESTIMONY

OF

ALBERT R. BASS, JR.

Case No. ER-2016-0285

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

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

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

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

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

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

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

10 A: My responsibilities include supervising two employees with responsibility for short-term
11 electric load forecasting, long-term electric load forecasting, weather normalization, and
12 various other analytical tasks.

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

14 A: I received a Bachelor of Science in Business Administration degree with emphasis in
15 Marketing from Missouri Western State University in 1989. I earned a Master of
16 Business Administration degree from William Woods University in 1995.

17 Prior to joining KCP&L, I worked for APS Technologies developing product
18 forecast models and conducting market analysis. In June 1998, I joined KCP&L as a
19 Technical Professional. In this role, I conducted market analysis, developed market

1 options studies, and research. In May 2000, I assumed the responsibilities for short-term
2 budget forecasting, long-term load forecasting for the Integrated Resource Plan, monthly
3 kilowatt-hour (“kWh”) sales and peak weather normalization, and weather normalization
4 for rate case filings. As part of these duties, I assisted with the creation of the weather
5 normalization testimony filed by KCP&L. In July 2013, I was promoted to my current
6 position as Manager of Market Assessment.

7 **Q: Have you previously testified in a proceeding before the Missouri Public Service**
8 **Commission (“Commission” or “MPSC”) or before any other utility regulatory**
9 **agency?**

10 A: Yes, I provided written testimony in KCP&L’s Greater Missouri Operation Company rate
11 case (MPSC – Case No. ER-2016-0156) and KCP&L’s 2014 rate cases (MPSC – Case
12 No. ER-2014-0370 and the Kansas Corporation Commission – Docket No. 15-KCPE-
13 116-RTS).

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

15 A: The purposes of my testimony are to:

16 I. Sponsor the weather normalization, customer growth, rate switching, and energy
17 efficiency adjustments of test year monthly kWh sales and peak loads in Schedules
18 ARB-1 through ARB-4. I recommend that the Commission adopt these results in the
19 current case.

20 II. Sponsor schedules showing the decline in average per-customer usage in Schedules
21 ARB-5 through ARB-8.

1 **I. WEATHER NORMALIZATION, CUSTOMER GROWTH**

2 **Q: What normalizations are you making to kWh sales and peak loads?**

3 A: Both monthly and hourly kWh sales are adjusted to reflect normal weather conditions.
4 This is called a weather adjustment. KWh sales are further adjusted for customer growth
5 that occurs between the test year and the true-up date of December 2016, and for
6 customers who were switched from one rate to another during or after the test year.
7 These customers are known as rate switchers. An additional adjustment to the kWh sales
8 is made for energy efficiency that occurs between the test year and two months prior to
9 the true-up date of December 2016.

10 **Q: What is the purpose of making a weather adjustment?**

11 A: Abnormal weather can increase or decrease a utility company’s revenues, fuel costs and
12 rate of return. Therefore, revenues and expenses are typically adjusted to reflect normal
13 weather to determine a company’s future electric rates. These adjustments are made by
14 first adjusting kWh sales and hourly loads and then using these results to adjust test-year
15 revenues and incremental costs (*i.e.*, fuel and purchased power).

16 During the test year, January 2015 through December 2015, there were 14.4%
17 less heating degree days and 1.2% less cooling degree days than normal at the Kansas
18 City International Airport. Thus, heating load was significantly lower than normal while
19 cooling load was closer to, but still lower than, normal.

20 **Q: What method was used to weather-normalize kWh sales?**

21 A: The method was based on load research (“LR”) data, which was derived by measuring
22 hourly loads for a sample of KCP&L’s customers representing the Residential, Small
23 General Service (“GS”), Medium GS, Large GS, and Large Power classes. The hourly

1 loads were grossed up by the ratio of the number of customers for each of these classes
2 divided by the number sampled.

3 In the first step, the hourly loads for the sample were calibrated to the annual
4 billed sales of all customers in each class. The ratio of the billed sales divided by the sum
5 of the hourly loads was multiplied by the load in each hour.

6 In the second step, the hourly loads were estimated for lighting tariffs and the
7 loads for all tariffs, including sales for resale, were grossed up for losses and compared to
8 Net System Input (“NSI”). The difference between this sum and the NSI then was
9 allocated back to the LR data in proportion to the hourly precisions that were estimated
10 for the LR data.

11 In the third step, regression analysis was used to model the hourly loads for each
12 rate class. These models included a piecewise linear temperature response function of a
13 two-day weighted mean temperature.

14 In the fourth step, this temperature response function was used to compute daily
15 weather adjustments as the difference between loads predicted with normal weather and
16 loads predicted with actual weather. Normal weather was derived using spreadsheets
17 provided by the MPSC Staff. The normal weather represents average weather conditions
18 over the 1981-2010 time period.

19 In the fifth step, the daily weather adjustments were split into hourly adjustments
20 and these were added to NSI to weather-normalize that series.

21 In the sixth step, the daily weather adjustments were split into billing months
22 based on the percentage of sales on each billing cycle and the meter reading schedule for

1 the test year period. These weather adjustments then are summed by billing month and
2 added to billed kWh sales to weather-normalize that data.

3 **Q: What adjustment did you make for rate switchers?**

4 A: Each year a small percentage of customers are switched from their current tariff to
5 another that is expected to reduce their electric bills. We adjusted kWh sales for the
6 Large Power tariff for customers that switched into or out of this tariff. The customer
7 growth adjustment accounted for rate switchers in the other tariffs.

8 **Q: What adjustment did you make for customer growth?**

9 A: For each month in the test year, the weather-normalized sales per customer were
10 multiplied by the number of customers projected for the true-up date. This adjustment is
11 made to weather-normalized sales to the Residential, Small GS, Medium GS, and Large
12 GS classes. When the numbers become available, I will revise this adjustment using the
13 actual number of customers as of the true-up date. Sales to Large Power customers are
14 adjusted by plotting each customer's monthly kWh sales and looking for any changes in
15 sales that appear to be or are known to be permanent. If any such changes are identified,
16 sales during the test year are adjusted to reflect the change. The adjustments for growth
17 to Large Power sales will be revised using the most current data for the true-up.

18 **Q: Were any other adjustments made besides the adjustment for rate switchers and**
19 **customer growth?**

20 A: Yes, an additional adjustment is made to annualize the impact of the Company's energy
21 efficiency programs on test year sales. During the test year, KCP&L invested
22 significantly on programs designed to help customers use energy more efficiently. The
23 result of this investment in energy efficiency programs is a decline in the sales made by

1 the Company relative to the level of sales that would be made absent the programs.
2 Because the Company programs generated customer savings during the test year and
3 true-up period, the impact of those efficiency measures installed during the test year
4 should be annualized to reflect the full impact of the measures on the Company's sales.

5 **Q: Do installed efficiency measures in the test year affect the test year sales and why is**
6 **it necessary to further adjust sales to fully reflect the impact of the programs?**

7 A: Yes, if a residential customer who is not participating in any Company energy efficiency
8 programs has an annual average usage of 10,500 kWh and then decided to participate in
9 the Company programs with four months left in the test year, which now reduces their
10 actual test year usage to 10,000 kWh, the Company would only see a reduction of 500
11 kWh in the test year. In this example on an annual basis going forward, however, the
12 customer's true annual average consumption is actually reduced by 1,500 kWh due to the
13 energy efficiency actions promoted by the Company. The reason is the change took
14 place during the test year, but the impacts of the installed measures are only reflected in
15 one-third of the test year load. The effect can be extreme when you start looking at all
16 customer participation rates and the fact that they sign up and participate in various
17 programs throughout the test year. Since the Company has documented participation
18 rates and measures installed in the test year, the annualized energy savings of those
19 measures, and the installation dates of the measures, it is appropriate to reflect the full
20 energy impact of the measures in the test year. This is a known and measurable change
21 in the energy consumption that occurred before the end of the test year, which will
22 continue going forward and should be annualized.

1 **Q: What are the adjustments to annualize the impact of the Company’s energy**
2 **efficiency programs on test year’s sales?**

3 A: Upon filing a rate case, the cumulative, annualized, normalized kWh and kilowatt (“kW”)
4 savings will be included in the unit sales and sales revenues used in setting rates as of an
5 appropriate time (most likely two months prior to the true-up date) where actual results
6 are known prior to the true-up period, to reflect energy and demand savings in the billing
7 determinants and sales revenues used in setting the revenue requirements and tariffed
8 rates in the case.

9 **Q: Describe how you calculated the energy efficiency adjustment.**

10 A: The calculation of the energy efficiency adjustment is based on the stipulation in Case
11 No. EO-2015-0240¹:

12 In the first step, KCP&L will take test period weather normalized kWh usage for
13 each customer class by billing month and adjust it by² adding back the monthly kWh
14 energy savings by customer class incurred during the test period from all active Missouri
15 Energy Efficiency Investment Act (“MEEIA”) programs, excluding Home Energy
16 Reports and Income-Eligible Home Energy Reports programs which have a one year
17 measure life, determined using the same methodology as described in Tariff Sheet 49
18 through 49P (KCP&L) except that calendar month load shape percentages by program by
19 month will be converted to reflect billing month load shape percentages by program,

¹ Non-Unanimous Stipulation and Agreement Resolving MEEIA Filings, Case No. EO-2015-0240, pp. 13-15.

² Step 1. Begin with Weather Normalized kWh per class provided by Company. Step 2. Compute Monthly Savings kWh (MS) per program in the same manner as used for TD calculation. Step 3. Weather Normalized kWh before application of Energy Efficiency (EE) adjustment. Step 4. Cumulative Annual Savings kWh (CAS) per program computed in the same manner as TD calculation as of Rebase Date. Step 5. Monthly Load Shape percentage per program converted to billing month equivalent by using a weighted average calendar month Load Shape percentage based on billing cycle information of the rate case. Step 6. Monthly EE Rebase Adjustment. Step 7. Weather Normalized kWh rebased for EE.

Non-Unanimous Stipulation and Agreement Resolving MEEIA Filings, Case No. EO-2015-0240, -0241, p. 13.

1 calculated by computing a weighted average of the current and succeeding month
2 percentages.

3 In the second step, the adjusted test period sales from above will be annualized for
4 customers and additionally be adjusted further by subtracting the cumulative annual kWh
5 energy savings from the first month of the test period through the month ending where
6 actual results are available (most likely two months prior to the true-up date) by customer
7 class from all active MEEIA programs, excluding Home Energy Reports and Income-
8 Eligible Home Energy Reports, determined using the same methodology as described in
9 Tariff Sheet 49 through 49P (KCP&L) except that calendar month load shape percentages
10 by program by month are converted to reflect billing month load shape percentages by
11 program, calculated by computing a weighted average of the current and succeeding
12 month percentages.

13 In the third step, the test period kW demand for each customer class will be
14 adjusted by³ adding back the monthly kW demand savings by customer class incurred
15 during the test period from all active MEEIA programs, excluding Home Energy Reports,
16 Income-Eligible Home Energy Reports and Demand Response Incentive programs,
17 determined using the same methodology as described for kWh savings in Tariff Sheet 49
18 through 49P (KCP&L) and then subtracting the cumulative annual kW demand savings
19 from the first month of the test period through the month ending where actual results are
20 available (most likely two months prior to the true-up date) by customer class from all

³ Step 1. Begin with kW demand per class provided by Company. Step 2. Compute Monthly kW demand per program in the same manner as used for TD calculation. Step 3. kW demand before application of Energy Efficiency (EE) adjustment. Step 4. Cumulative Annual kW demand per program computed in the same manner as TD calculation as of Rebase Date. Step 5. Monthly Load Shape percentage per program converted to billing month equivalent by using a weighted average calendar month Load Shape percentage based on billing cycle information of the rate case. Step 6. Monthly EE Rebase Adjustment. Step 7. kW demand rebased for EE.

Non-Unanimous Stipulation and Agreement Resolving MEEIA Filings, Case No. EO-2015-0240, -0241, p. 13.

1 active MEEIA programs, excluding Home Energy Reports, Income-Eligible Home
2 Energy Reports and Demand Response Incentive programs, determined using the same
3 methodology as described for kWh savings in Tariff Sheet 49 through 49P (KCP&L).

4 In the fourth step, after the energy efficiency adjustment for kWh and kW has
5 been determined, weather normalized kWh and kW are rebased with the energy
6 efficiency adjustment. kWh sales are rebased by subtracting the energy efficiency
7 adjustment from the weather normalized kWh and kW (demand) is determined by taking
8 the monthly kWh and spreading it across an hourly load shape to determine the monthly
9 peak demand.

10 The impacts that are applied to the weather normalized and customer adjusted
11 kWh used to rebase the weather normalized sales are shown in Schedule ARB-2.

12 **Q: What are the results of these normalizations?**

13 A: Schedule ARB-1 shows the monthly adjustments for normalization on kWh sales.
14 Schedule ARB-2 shows the annualized kWh energy efficiency impact. Schedule ARB-3
15 shows weather-normalized customer annualized monthly peaks by class. Schedule
16 ARB-4 shows weather-normalized customer annualized loads by class at the time of the
17 monthly system peak load.

18 **Q: How are the results used?**

19 A: Weather-normalized, customer-annualized kWh sales are used to calculate test year
20 revenues and fuel costs.

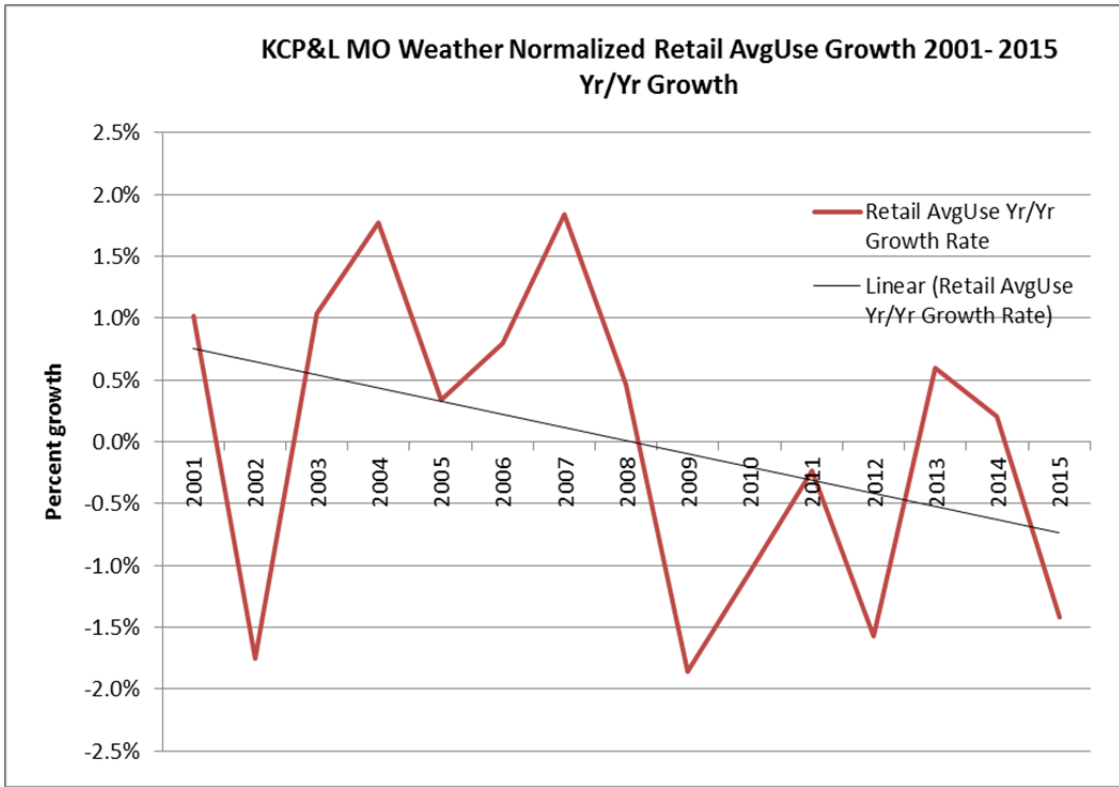
1 **II. DECLINE IN AVERAGE PER-CUSTOMER USAGE**

2 **Q: What is the trend in average use?**

3 A: Prior to the 2008 economic recession the KCP&L MO service territory was experiencing
4 compounded annual growth rates (“CAGR”) in residential weather normalized billed
5 kWh sales at 2.0% and average per-customer usage at 1.4% during the time period of
6 2000-2007. During the same time period the commercial sector was seeing similar
7 growth with weather normalized billed kWh sales growing at 1.4% and average
8 per-customer usage at 0.1% while the industrial sector weather normalized billed kWh
9 sales was growing at 0.6% and average per-customer usage at 2.2%.

10 During the time period 2010-2015, CAGR in the KCP&L MO service territory
11 has essentially flattened or stalled out: residential weather normalized billed kWh sales
12 were -0.3% and average per-customer usage was -0.6%, commercial weather normalized
13 billed kWh sales were 0.0% and average per-customer usage was -0.1% and industrial
14 weather normalized billed kWh sale were -0.8% and average per-customer usage was
15 0.7%. Weather normalized billed kWh sales and weather normalized average use
16 per-customer is shown in Schedule ARB-5 through Schedule ARB-7.

17 The year-over-year growth in retail average use per-customer for the KCP&L MO
18 service area has steadily declined since the 2008 recession. Prior to the recession and
19 energy efficiency it had been experiencing growth. Figures 1 and 2 illustrate the decline
20 in weather normalized retail average use per-customer and weather normalized billed
21 MWh sales.

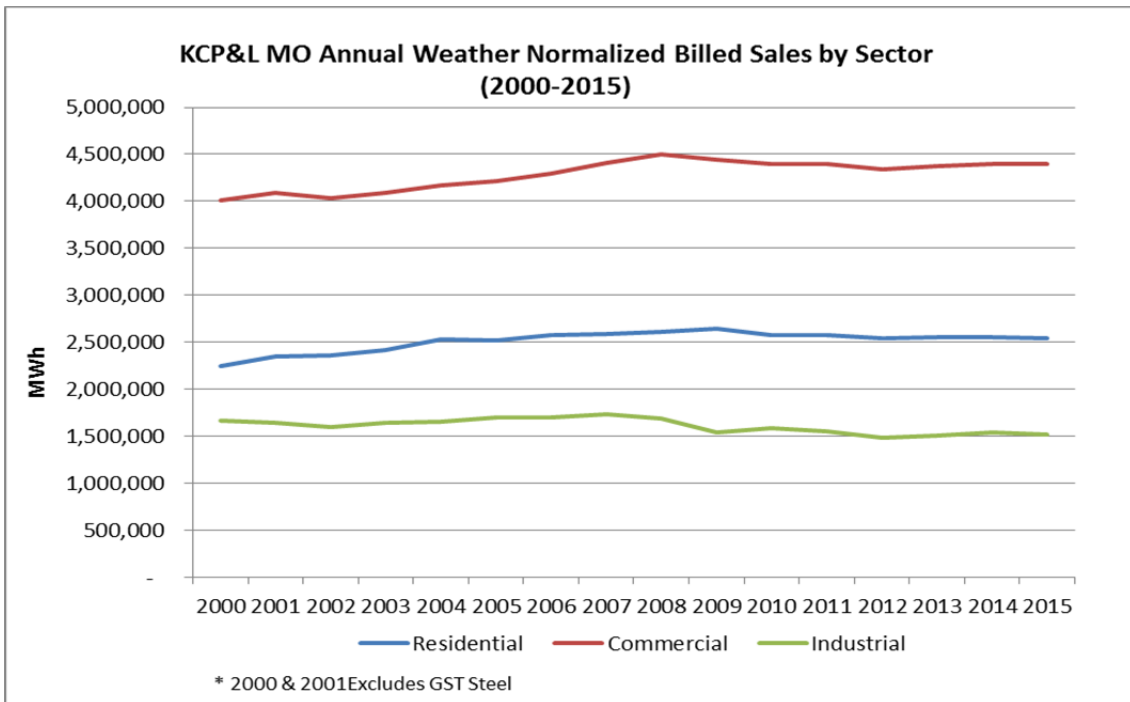


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Figure 1: KCP&L MO Weather Normalized Retail Growth Rates for Average Use per Customer 2001-2015



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Figure 2: KCP&L MO Weather Normalized Class Billed MWh Sales 2000-2015

1 **Q: What is the cause of this trend?**

2 A: A single cause is unclear. However there are several potential contributory explanations:

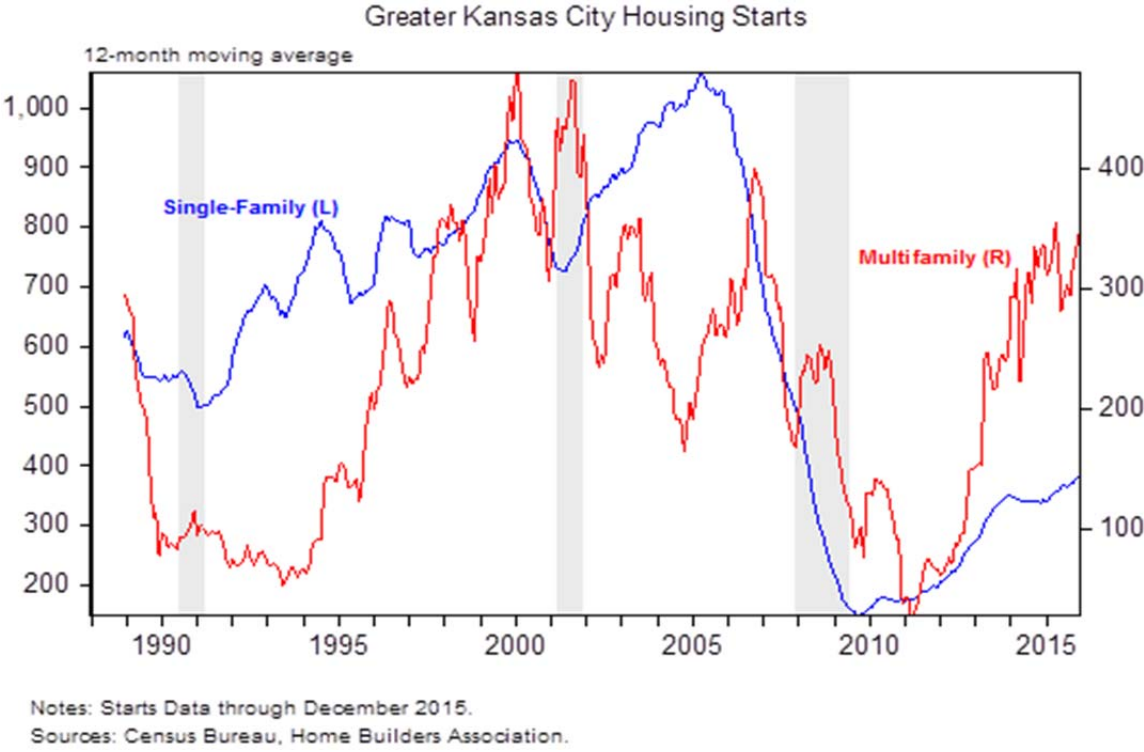
3 Recession Lag: We have never fully recovered from the 2008-2009 recession.
4 But, the recession alone does not explain the recent decline, rather a variety of changes in
5 the market place due to the recession and demographic changes after the recession have
6 contributed to the decline in average per-customer usage.

7 Federal Standards: The Federal Standards promulgated to date have saved
8 consumers \$58 billion in utility bill savings which amounts to nearly \$250 per household
9 per year in energy bill savings. Today there are over 60 covered products which account
10 for 90% of residential energy use, 60% of commercial energy use, and 30% of industrial
11 energy use. These standards have had a dramatic impact on the average use per-customer
12 over the last several years. For example, a typical new refrigerator uses one-third the
13 energy today compared to in 1973 with 20% more storage capacity and at half the retail
14 cost and a new air conditioner today uses about 50% less energy than in 1990. The
15 Company has seen these impacts within its own service territory with rebates being
16 offered for both new refrigerators and air conditioners. Based on the last appliance
17 saturation survey conducted by the Company, 28% of its customers have replaced their
18 air conditioner in the past five years with a more efficient unit. Federal standard
19 programs have put downward pressure on average use per customer.

20 Company Sponsored Energy Efficiency Programs: Over the past ten years energy
21 efficiency has reduced residential load by 95,576,147 kWh, commercial by
22 167,752,497 kWh and industrial by 57,117,802 kWh as of December 31, 2015. These
23 impacts can be found in Schedule ARB-8. Company sponsored programs continue to

1 have an impact due to implementation of new programs and persistence from existing
2 programs.

3 Housing Market: The housing market has never fully recovered since the
4 recession. Even though the housing market has picked up, it has not been enough to
5 offset the decline in average use per customer. Interest rates continue to be lower than
6 they were during the housing boom. In fact, interest rates have been at all-time low for
7 an unprecedented period with inflation at or below 2%. The unemployment rate is lower
8 than it was prior to the recession. Even with favorable factors, there has not been a
9 marked increase in single family housing.



10 Figure 3: Single-Family & Multifamily - 12 Month Moving Average Housing Starts⁴

⁴ Kansas City National Association of Home Builders – Monthly Housing Starts Report. <http://www.census.gov/construction/nrc/index.html> and <http://www.kchba.org/news/permit-reports>

1 The current rate of single-family housing starts still remains almost two-thirds
2 below its peak prior to the housing crisis and more than one-third below its peak during
3 the 1990s, applying downward pressure to average use per customer. In sharp contrast,
4 multifamily housing starts have rebounded strong from their low during the housing crisis
5 (Figure 3). The smaller square-footage of multifamily applies more downward pressure
6 to average use per customer. Millennial and young adults have primarily driven the
7 recent rebound in multifamily home construction, reversing their earlier swing towards
8 single family homes during the housing boom. From 2002 to 2007, young adults vacated
9 multifamily units, thereby depressing multifamily construction. From 2010 to 2015,
10 however, young adults began moving out of their parents' houses, requiring builders to
11 construct new units. Some have interpreted the recent increase in young adults'
12 multifamily occupancy as reflecting millennials' stronger preference for living in
13 apartments. However, most of the increase simply reflects a return to trend behavior and
14 the impact of other factors such as stricter lending standards, low wage growth and
15 under-employment.

16 In contrast to young adults, multifamily occupancy among older adults is
17 increasing. However, the rate of construction needed to meet their increasing demand
18 rose only modestly during the period of 2010 to 2015 compared with the period of 2002
19 to 2007, and so older adults did not drive the recent multifamily rebound. However, the
20 rate at which baby boomers retire should increase. As the senior population expands —
21 and more seniors decide to down-size from larger single family homes to smaller single
22 family homes or apartments, seniors will likely supplement young adults as the main
23 driver of growth in multifamily construction. This demographic behavior should

1 continue to put downward pressure on average use per customer. By the end of 2017 it is
2 expected that Missouri will only return to 74% - 85% of normal housing production
3 levels⁵.

4 Electric Price: Recent rate increases, largely driven by environmental mandates,
5 have impacted the perceived value of electric energy causing customers to consider
6 higher levels of efficiency or conservation.

7 In summary, the decline in average usage per-customer is a result of several
8 factors: federal standards (efficiency improvements resulting from appliance efficiency),
9 company efficiency programs, the housing market and electricity price. These factors
10 have decreased consumption per household, despite increases in the number of
11 customers, the average size of homes, and increased use of electronics.

12 **Q: Do you expect the trend to change in the future?**

13 A: It is not expected that the Company will return to the previous trend prior to 2008 due to
14 continued federal standards initiatives, company sponsored energy efficiency programs
15 and increasing electricity prices.

16 Federal Standards: The U.S. Department of Energy (“DOE”) issued 10 final rules
17 in 2014 which was the most ever in one calendar year. The cumulative utility bill savings
18 to consumer from these new standards issued are estimated to save consumers \$78 billion
19 through 2030⁶. In December 2015, the DOE announced historic new efficiency standards
20 for commercial air conditioners and furnaces which is the largest energy saving standard
21 in history. This standard was developed with industry, utilities, and environmental

⁵ David Crowe, Chief Economist, Kansas, City National Association of Home Builders, “Economic and Housing Outlook” presentation January 13, 2016.

⁶ John Cymbalsky, U.S. Department of Energy, “The U.S. Appliance Standards Program” presentation to Energy Forecasting Group meeting in May 2015.

1 groups to save more energy than any other standard issued to date by the DOE. It is
2 estimated that over the lifetime of these products it will save businesses over \$167 billion
3 on their utility bills. The new commercial air conditioning and furnace standards will
4 occur in two phases starting in 2018 with a 13 percent efficiency improvement and five
5 years later with an additional 15 percent increase in efficiency⁷. Federal Standards will
6 continue to impact sales over the next 10-20 years resulting in \$1.8 trillion (128
7 quadrillion British thermal units of energy) in cumulative utility bill savings to consumers
8 through 2030⁸.

9 Company Energy Efficiency Programs: The persistence from Company's current
10 efficiency programs and new programs adopted in the future will continue to put
11 downward pressure on average use per customer. Further, the Company's preferred plan
12 from the most recent Integrated Resource Plan shows that energy efficiency is expected
13 to continue to be a least cost resource.

14 Electric Price: If the price of electricity continues to increase due to
15 environmental or other mandates, consumers will continue to respond and adjust their
16 usage to meet their individual monetary situation.

17 The above impacts will continue to hold down the growth in average use per
18 customer in the future.

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

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

⁷ <http://www.energy.gov/articles/energy-department-announces-largest-energy-efficiency-standard-history>

⁸ John Cymbalsky, U.S. Department of Energy, "The U.S. Appliance Standards Program" presentation to Energy Forecasting Group meeting in May 2015.

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) Case No. ER-2016-0285
A General Rate Increase for Electric Service)

AFFIDAVIT OF ALBERT R. BASS, JR.

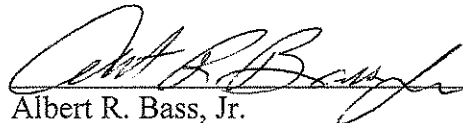
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

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

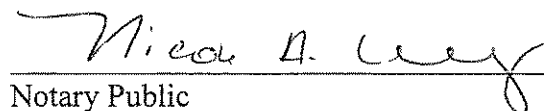
1. My name is Albert R. Bass, Jr. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Manager of Market Assessment.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Kansas City Power & Light Company consisting of Sixteen (16) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

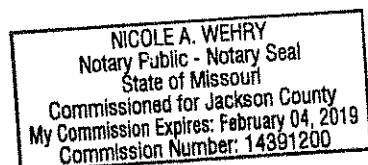
3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.


Albert R. Bass, Jr.

Subscribed and sworn before me this 1st day of July, 2016.


Notary Public

My commission expires: Feb. 4 2019



WEATHER ADJUSTMENTS TO MONTHLY BILLED SALES OF KCP&L

NORMALIZATIONS TO MONTHLY MWH SALES

		Weather Adjustments to Monthly Billed Sales												
State	Tariff	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Test Year
KS	Residential	-11,369	10,876	7,557	-12,497	-7,786	3,034	-4,135	-27,197	7,140	20,629	-7,966	-25,188	-46,902
KS	Small GS	-620	568	542	-509	-351	135	-193	-1,305	279	1,157	-265	-1,266	-1,828
KS	Medium GS	-994	893	988	-661	-474	178	-305	-2,147	672	2,598	-91	-1,949	-1,291
KS	Large GS	-3,414	3,077	3,176	-2,329	-1,858	416	-513	-4,623	1,222	5,196	-960	-6,794	-7,405
KS	Large Power	0	0	0	0	0	0	0	0	0	0	0	0	0
KS	Off Peak Lighting													
	Total	-16,397	15,414	12,263	-15,995	-10,470	3,763	-5,146	-35,272	9,313	29,580	-9,282	-35,199	-57,426
MO	Residential	-9,771	7,440	8,294	-10,474	-7,587	3,071	-2,658	-24,834	2,500	19,896	-6,321	-21,026	-41,469
MO	Small GS	-798	565	714	-846	-552	131	-186	-1,499	232	1,505	-432	-1,706	-2,873
MO	Medium GS	-1,681	1,164	1,852	-1,511	-1,202	80	-357	-3,280	532	4,049	-8	-3,230	-3,591
MO	Large GS	-3,787	2,695	4,074	-2,914	-1,865	118	-593	-4,461	740	4,677	-1,104	-7,448	-9,868
MO	Large Power	0	0	98	-258	-598	316	-587	-2,605	1,643	2,360	577	58	1,005
	Total	-16,037	11,864	15,032	-16,003	-11,805	3,717	-4,379	-36,678	5,648	32,487	-7,288	-33,353	-56,795

ANNUALIZED ENERGY EFFICIENCY IMPACTS FOR KCP&L

ENERGY EFFICIENCY ADJUSTMENT TO MONTHLY MMWH SALES

		Energy Efficiency Adjustments to Monthly Billed Sales												
State	Tariff	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Test Year
KS	Residential	0	0	0	0	0	0	0	0	0	0	0	0	0
KS	Small GS	0	0	0	0	0	0	0	0	0	0	0	0	0
KS	Medium GS	0	0	0	0	0	0	0	0	0	0	0	0	0
KS	Large GS	0	0	0	0	0	0	0	0	0	0	0	0	0
KS	Large Power	0	0	0	0	0	0	0	0	0	0	0	0	0
KS	Off Peak Lighting	0	0	0	0	0	0	0	0	0	0	0	0	0
	Total	0	0	0	0	0	0	0	0	0	0	0	0	0
MO	Residential	-2,449	-2,103	-1,828	-1,649	-1,585	-1,792	-2,063	-2,020	-1,620	-1,294	-1,121	-1,074	-20,597
MO	Small GS	-698	-673	-686	-698	-732	-824	-876	-870	-753	-610	-512	-459	-8,392
MO	Medium GS	-1,596	-1,533	-1,559	-1,567	-1,682	-1,966	-2,136	-2,147	-1,805	-1,291	-940	-797	-19,018
MO	Large GS	-3,404	-3,295	-3,368	-3,398	-3,555	-4,002	-4,233	-4,309	-3,812	-3,053	-2,552	-2,278	-41,260
MO	Large Power	-3,085	-3,031	-3,130	-3,086	-3,165	-3,723	-4,200	-4,227	-3,648	-2,523	-1,779	-1,664	-37,261
	Total	-11,233	-10,635	-10,572	-10,399	-10,718	-12,306	-13,508	-13,572	-11,638	-8,771	-6,903	-6,272	-126,528

WEATHER NORMALIZED MONTHLY PEAK LOADS (MW) for KCP&L

WEATHER NORMALIZED MONTHLY PEAK LOADS WITH CUSTOMER GROWTH THROUGH December 2016 (MW)

State	Tariff	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Test Year
KS	Residential	713	644	531	477	611	960	1,034	1,056	772	483	484	638	1,056
KS	Small GS	90	78	77	68	76	92	104	97	92	72	65	80	104
KS	Medium GS	156	153	139	146	143	179	186	185	169	149	127	133	186
KS	Large GS	469	434	392	378	412	450	463	476	433	408	388	399	476
KS	Street Lights	2	2	2	2	2	2	2	2	2	2	2	2	2
KS	Traffic Signals	0	0	0	0	0	0	0	0	0	0	0	0	0
KS	Area Lights	1	1	1	1	1	1	1	1	1	1	1	1	1
KS	Off Peak Lighti	10	10	10	10	10	10	10	10	10	10	10	10	10
MO	Residential	572	461	429	359	442	805	879	856	608	335	450	536	879
MO	Small GS	88	77	72	65	77	103	119	109	96	82	75	88	119
MO	Medium GS	236	209	199	205	211	255	279	270	250	218	191	214	279
MO	Large GS	389	359	333	322	334	366	393	408	360	337	347	350	408
MO	Large Power	253	259	261	269	276	306	317	327	301	279	267	258	327
MO	Street Lights	18	18	18	18	18	18	18	18	18	18	18	18	18
MO	Traffic Signals	0	0	0	0	0	0	0	0	0	0	0	0	0
MO	Area Lights	3	3	3	3	3	3	3	3	3	3	3	3	3

Note: These numbers include losses.

WEATHER NORMALIZED MONTHLY COINCIDENT PEAK LOADS (MW) for KCP&L

WEATHER NORMALIZED MONTHLY COINCIDENT PEAK LOADS WITH CUSTOMER GROWTH THROUGH December 2016 (MW)

State	Tariff	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Test Year
KS	Residential	679	586	531	477	501	917	995	912	746	393	457	632	995
KS	Small GS	74	62	52	41	70	82	94	97	75	64	51	53	97
KS	Medium GS	137	123	104	98	135	168	177	180	155	129	103	99	180
KS	Large GS	465	424	323	302	386	422	444	462	392	379	354	341	465
KS	Street Lights	0	0	2	2	0	0	0	0	0	0	2	2	2
KS	Traffic Signals	0	0	0	0	0	0	0	0	0	0	0	0	0
KS	Area Lights	0	0	1	1	0	0	0	0	0	0	1	1	1
KS	Off Peak Lighti	2	0	9	10	0	0	0	0	0	0	10	10	10
	Total Retail	1,357	1,195	1,022	931	1,093	1,589	1,711	1,651	1,368	966	978	1,139	1,711
MO	Residential	512	438	415	359	399	759	811	799	594	296	409	536	811
MO	Small GS	77	64	55	41	71	93	101	109	77	73	59	60	109
MO	Medium GS	198	178	154	145	197	235	254	262	228	197	161	159	262
MO	Large GS	389	353	298	247	311	343	364	395	333	320	311	315	395
MO	Large Power	234	240	236	257	270	289	313	322	298	277	246	207	322
MO	Street Lights	3	0	15	18	0	0	0	0	0	0	18	18	18
MO	Traffic Signals	0	0	0	0	0	0	0	0	0	0	0	0	0
MO	Area Lights	1	0	3	3	0	0	0	0	0	0	3	3	3
		1,414	1,273	1,176	1,070	1,248	1,719	1,843	1,888	1,531	1,163	1,207	1,299	1,888

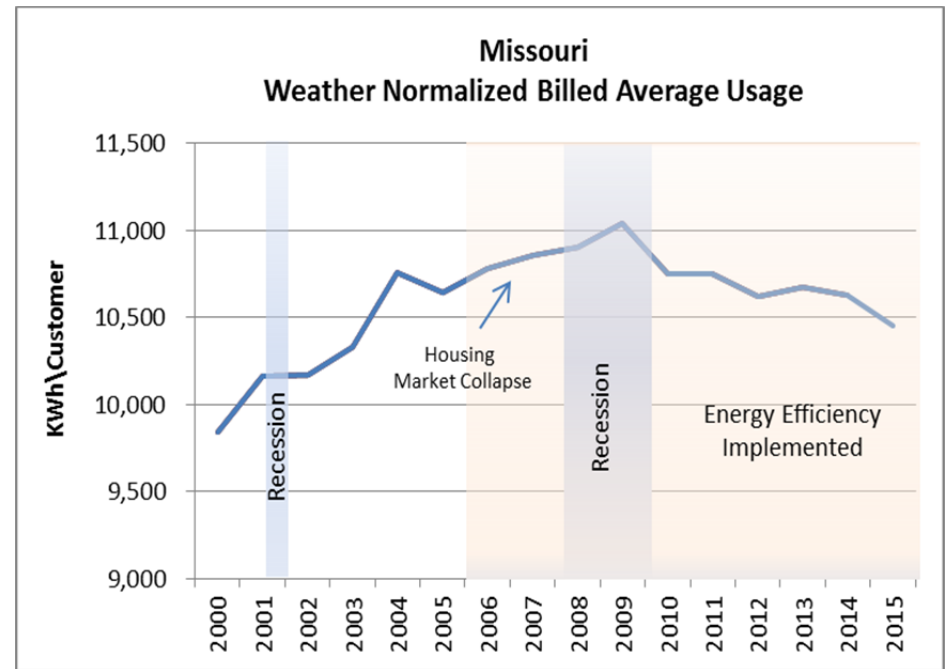
KCP&L MO RESIDENTIAL WEATHER NORMALIZED BILLED KWH SALES, AVERAGE USE AND CUSTOMERS

KCP&L Jurisdiction
WN Residential Billed KWh Sales and Average Usage

Year	Missouri					
	Missouri KWh	KWh Yr/Yr Growth	# of Cust	Customer Yr/Yr Growth	AvgUse	AvgUse Yr/Yr Growth
2000	2,250,636,274		228,625		9,844	
2001	2,348,249,676	4.3%	231,005	1.0%	10,165	3.3%
2002	2,363,765,482	0.7%	232,406	0.6%	10,171	0.1%
2003	2,418,634,930	2.3%	234,170	0.8%	10,329	1.6%
2004	2,531,487,965	4.7%	235,351	0.5%	10,756	4.1%
2005	2,517,831,168	-0.5%	236,612	0.5%	10,641	-1.1%
2006	2,570,270,761	2.1%	238,389	0.8%	10,782	1.3%
2007	2,590,704,186	0.8%	238,659	0.1%	10,855	0.7%
2008	2,605,165,129	0.6%	238,921	0.1%	10,904	0.4%
2009	2,639,670,143	1.3%	239,070	0.1%	11,041	1.3%
2010	2,575,296,709	-2.4%	239,600	0.2%	10,748	-2.7%
2011	2,570,812,091	-0.2%	239,105	-0.2%	10,752	0.0%
2012	2,536,652,900	-1.3%	238,776	-0.1%	10,624	-1.2%
2013	2,552,669,206	0.6%	239,108	0.1%	10,676	0.5%
2014	2,555,313,201	0.1%	240,422	0.5%	10,628	-0.4%
2015	2,542,777,319	-0.5%	243,292	1.2%	10,452	-1.7%

Compound Annual Growth Rates

00—05	2.3%	0.7%	1.6%
05—10	0.5%	0.3%	0.2%
10—15	-0.3%	0.3%	-0.6%



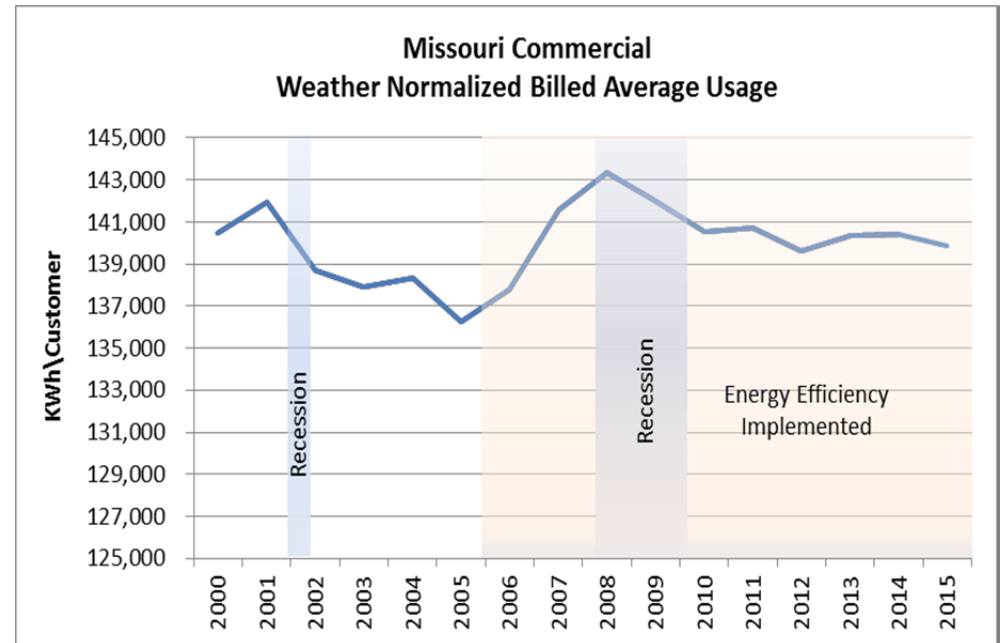
KCP&L MO COMMERCIAL WEATHER NORMALIZED BILLED KWH SALES, AVERAGE USE AND CUSTOMERS

KCPL Jurisdiction
WN Commercial Billed KWh Sales and Average Usage

Year	Missouri					
	MPS KWh	KWh Yr/Yr Growth	# of Cust	Customer Yr/Yr Growth	AvgUse	AvgUse Yr/Yr Growth
2000	4,012,026,110		28,555		140,502	
2001	4,093,511,010	2.0%	28,845	1.0%	141,913	1.0%
2002	4,036,978,599	-1.4%	29,108	0.9%	138,691	-2.3%
2003	4,090,720,104	1.3%	29,669	1.9%	137,877	-0.6%
2004	4,163,801,351	1.8%	30,103	1.5%	138,320	0.3%
2005	4,217,756,315	1.3%	30,958	2.8%	136,241	-1.5%
2006	4,299,222,702	1.9%	31,196	0.8%	137,813	1.2%
2007	4,412,412,603	2.6%	31,167	-0.1%	141,575	2.7%
2008	4,495,042,523	1.9%	31,352	0.6%	143,374	1.3%
2009	4,447,102,004	-1.1%	31,312	-0.1%	142,026	-0.9%
2010	4,392,797,612	-1.2%	31,264	-0.2%	140,507	-1.1%
2011	4,394,522,874	0.0%	31,228	-0.1%	140,724	0.2%
2012	4,343,786,324	-1.2%	31,116	-0.4%	139,598	-0.8%
2013	4,369,094,393	0.6%	31,126	0.0%	140,366	0.6%
2014	4,396,528,277	0.6%	31,307	0.6%	140,435	0.0%
2015	4,400,076,551	0.1%	31,460	0.5%	139,864	-0.4%

Compound Annual Growth Rates

00—05	1.0%	1.6%	-0.6%
05—10	0.8%	0.2%	0.6%
10—15	0.0%	0.1%	-0.1%



KCP&L MO INDUSTRIAL WEATHER NORMALIZED BILLED KWH SALES, AVERAGE USE AND CUSTOMERS

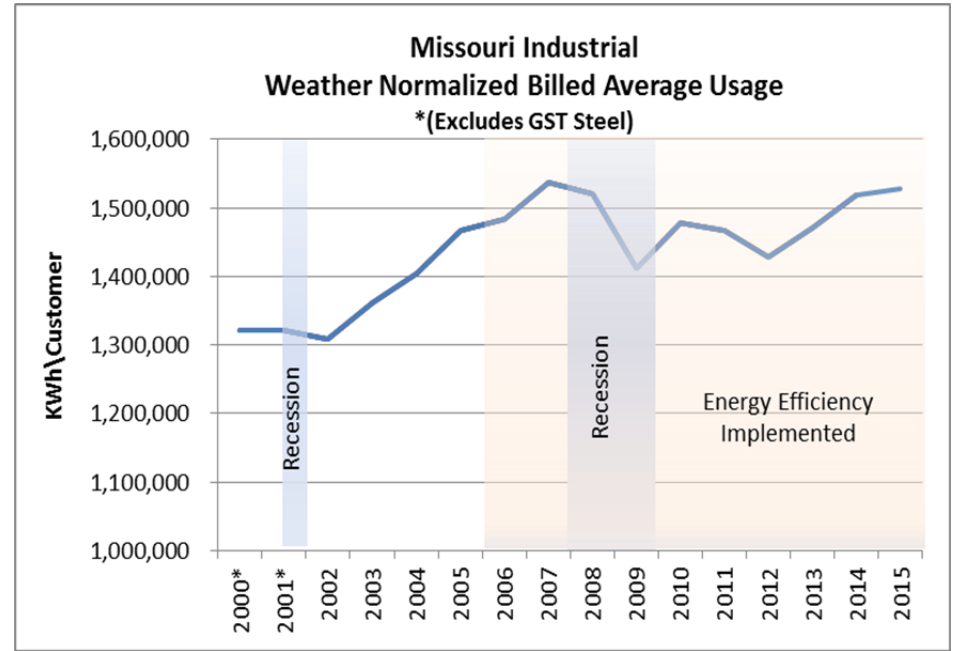
KCPL Jurisdiction
WN Industrial Billed KWh Sales and Average Usage

Missouri						
Year	MPS KWh	KWh Yr/Yr Growth	# of Cust	Customer Yr/Yr Growth	AvgUse	AvgUse Yr/Yr Growth
2000*	1,663,646,582		1,259		1,321,316	
2001*	1,647,412,833	-1.0%	1,246	-1.0%	1,322,073	0.1%
2002	1,596,725,872	-3.1%	1,221	-2.0%	1,307,631	-1.1%
2003	1,641,804,826	2.8%	1,205	-1.3%	1,362,682	4.2%
2004	1,650,248,271	0.5%	1,175	-2.5%	1,404,965	3.1%
2005	1,704,184,570	3.3%	1,162	-1.1%	1,466,281	4.4%
2006	1,700,708,106	-0.2%	1,146	-1.4%	1,483,715	1.2%
2007	1,731,682,632	1.8%	1,127	-1.7%	1,536,315	3.5%
2008	1,688,827,094	-2.5%	1,111	-1.4%	1,519,527	-1.1%
2009	1,541,550,030	-8.7%	1,093	-1.7%	1,410,922	-7.1%
2010	1,584,359,329	2.8%	1,072	-1.9%	1,478,522	4.8%
2011	1,549,728,403	-2.2%	1,057	-1.4%	1,466,851	-0.8%
2012	1,487,144,321	-4.0%	1,042	-1.4%	1,427,316	-2.7%
2013	1,505,939,397	1.3%	1,024	-1.7%	1,471,003	3.1%
2014	1,539,463,428	2.2%	1,014	-1.0%	1,518,833	3.3%
2015	1,520,518,628	-1.2%	996	-1.8%	1,527,392	0.6%

*Excludes GST Steel

Compound Annual Growth Rates

00—05	0.5%	-1.6%	2.1%
05—10	-1.4%	-1.6%	0.2%
10—15	-0.8%	-1.5%	0.7%



KCP&L MO PAST ENERGY EFFICIENCY PROGRAM SAVINGS

Savings from Company's current efficiency programs
All kWh @ customer meter

Date	Total kWh					Total kWh
	KCPL-MO Residential	KCPL-MO C&I	KCPL-MO Small Commercial	KCPL-MO Large Commercial	KCPL-MO Industrial	
2005	360,306	-	-	-	-	360,306
2006	1,601,187	166,301	11,142	112,918	42,240	1,767,488
2007	2,043,984	6,967,422	466,817	4,730,880	1,769,725	9,011,406
2008	4,118,708	13,481,824	903,282	9,154,158	3,424,383	17,600,532
2009	6,334,082	21,523,683	1,442,087	14,614,581	5,467,015	27,857,765
2010	5,794,352	28,446,678	1,905,927	19,315,294	7,225,456	34,241,030
2011	4,598,128	22,064,912	1,478,349	14,982,075	5,604,488	26,663,040
2012	3,838,902	30,103,551	2,016,938	20,440,311	7,646,302	33,942,453
2013	2,548,798	14,623,032	979,743	9,929,039	3,714,250	17,171,830
2014	28,908,701	29,761,354	1,994,011	20,207,959	7,559,384	58,670,055
2015	32,429,000	57,730,542	3,867,946	39,199,038	14,663,558	90,159,542
Total	92,576,147	224,869,299	15,066,243	152,686,254	57,116,802	317,445,446