

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the investigation)
of steam service rendered by) Case No. HQ-86-139
Kansas City Power & Light Company.)

HEARING MEMORANDUM

Introduction

On July 7, 1986, Kansas City Power & Light Company (KCPL) filed tariffs reflecting (i) Revised Rate Schedules of Increased Steam Service Rates, (ii) as an alternative thereto, Phase-In Rate Schedules of Increased Steam Service Rates, (iii) a Conversion Schedule dividing KCPL's steam service territory into various distribution areas and assigning a date certain to each area when steam service from Grand Avenue Station will no longer be required to be provided, and (iv) Revised General Rules and Regulations Applying to Steam Service. On August 25, 1986, the Commission issued its Suspension Order and Notice of Proceedings wherein it suspended the filed tariffs to May 1, 1987, scheduled proceedings and filing deadlines in this matter, and stated other procedural requirements.

On September 26, 1986, KCPL filed its direct testimony and supporting schedules. The Commission Staff's prepared testimony was filed on February 23 and 24, 1987. On February 23, 1987, the prepared testimony of Randy J. Lennan was filed on behalf of KPL Gas Service Company (KPL) and on February 23, the testimony of Albert P. Mauro was filed on behalf of Intervenor's Boatmen's Bank et al., (the Intervenor Group).

On Monday, March 23, 1987, the prehearing conference was convened. The following parties were represented by counsel and participated in part or all of the prehearing conference: KCPL, Staff, Public Counsel, KPL Gas Service, State of Missouri, Jackson County, City of Kansas City, and the Intervenor Group. Following is a delineation of areas of agreement reached during the prehearing

OFFICIAL CASE FILE
MISSOURI PUBLIC SERVICE COMMISSION

Exhibit No. 1
Date 3/4/87 Case No. HQ-86-139
Reporter XXXXXXXXXX

conference and areas which remain at issue among the parties signing this Hearing Memorandum. A schedule of issues which indicates the parties' recommended order of hearing of the issues is attached hereto. Please note that the parties hereby request permission to make opening statements on the first day which hearings are scheduled, April 6, 1987.

The Commission's Suspension Order of August 25, 1986, required the parties to file a reconciliation setting forth the total amount or value of each party's case as well as the individual contested amounts or values associated with each party's total recommendation for expenses, revenues, and rate base. (P. 8). To the extent that dollar values are associated with each issue or recommendation, they are stated in the text of the Hearing Memorandum. To the extent possible, the Company and Staff have worked toward resolution of number differences, so there should be no major reconciliation problems in this docket.

The Suspension Order also required preparation of a draft Exhibit List; such a list is attached to this Hearing Memorandum, but will be subject to change for filing of rebuttal and surrebuttal testimony. Staff has provided a tentative listing of witnesses who will likely file rebuttal testimony, but reserves the right to file rebuttal testimony of additional witnesses or refrain from filing rebuttal as listed.

TERMINATION OF STEAM DISTRIBUTION SERVICE

A. KCPL Position

KCPL believes that regulated central station steam distribution service in downtown Kansas City is not economically viable, whether the service is provided by KCPL or another entity. It is thus KCPL's position that a sale of the system would not make the system viable.

KCPL's Downtown Steam Service Plan essentially provides for the phasing-out of steam distribution service from Grand Avenue Station by December 31, 1990. KCPL proposes to provide certain space

heating equipment to its steam customers at no cost to them, with the customers assuming ownership of that equipment at December 31, 1995. Each steam service customer, as the phase-out progresses, will be offered the option of either receiving steam service from an on-site electric boiler, or of becoming an electric space heating customer of KCPL. If the customer chooses space heating equipment, and it is more expensive than the corresponding boiler, the customer must in that case reimburse KCPL for the difference in the capital cost. KCPL will attempt to accommodate, to the extent practicable, each customer's conversion situation as the phase-out progresses, but believes that there must be a date certain for complete termination of steam distribution service.

The Plan provides that KCPL will own, install, and maintain the electric steam boilers, and those customers will continue to be steam customers served under the applicable steam service tariffs. KCPL will own and install the all-electric space heating equipment, and the customers will be responsible for maintenance. Although ownership of the boilers and electric space heating equipment will pass to the customers at December 31, 1995, the customers have the option of earlier purchase of the boilers or electric space heating equipment at its depreciated original cost. After December 31, 1995, all customers having on-site equipment (whether boilers or all-electric heating equipment) will become electric customers of KCPL and will be served under the applicable electric service tariffs. The Plan provides that KCPL will continue to offer building energy use studies at the facilities of each steam customer, to determine the appropriate sizing of the on-site equipment.

KCPL believes that it has properly devoted the necessary amount of management attention and control to its steam operations.

KCPL believes that it devoted adequate and appropriate attention to current and potential steam customers. KCPL provided information on its steam energy option to potential customers in the downtown area served by its steam operations, and also performed rate

analyses comparing electric and steam heat rates. Staff has not shown that a greater marketing effort would have resulted in a greater number of steam customers.

Witnesses: Beaudoin (KCPL) - Direct
Mandacina (KCPL) - Direct
Graham (KCPL) - Direct

B. Staff Position

Staff recommends that KCPL's proposal to phase out and discontinue central district heating system in downtown Kansas City should be rejected by the Commission. The Commission should not authorize discontinuance of this regulated utility service until the Company has made a clear showing that the service is no longer viable and the public convenience and necessity does not require its continuation. KCPL has not made a clear showing regarding the viability of this system, and did not fully investigate and evaluate available alternatives to discontinuance of the central system, including its refusal to pursue sale of the system to another entity and failure to consider natural gas as an alternative for its steam customers. KCPL has not provided an adequate reason for its refusal to consider sale of the system.

The Company's plan to provide electric boilers or space heating equipment to the steam customers is inappropriate because it violates the Commission's rule on promotional practices (4 CSR 240-14) and masks the true cost to its steam customers of conversion to electric heating. This plan, absent the Company's offer to bear the upfront capital costs and O&M costs of conversion, is actually the most costly alternative for the customer when compared to the cost of central steam.

In addition, it is Staff's position that KCPL has not made an effort to market steam utility service on its downtown steam loop. Although KCPL has improved the condition of its steam system during the 1980's, Staff contends that it continued to market steam heat as a secondary alternative to electric heat. Further, Staff believes KCPL

actually has "demarketed" the central district's heating system by failing to seek new customers and announcing its intention to discontinue steam utility service and donate the Grand Avenue Station for use as an aquarium. This is despite the fact that in testimony filed before the Commission in May, 1983, KCPL asserted that steam utility service in the downtown area could assist in revitalization efforts in the downtown area.

KCPL has also neglected the management and maintenance of the steam system.

Witnesses: Featherstone (Staff) - Direct, Rebuttal
Dahlen (Staff) - Direct
Miller (Staff) - Direct
Fuller (Staff) - Direct
Oligschlaeger (Staff) - Direct, Rebuttal
Haskamp (Staff) - Direct
Cox (Staff) - Direct
Bernsen (Staff) - Direct
Tooey (Staff) - Direct

C. State of Missouri Position

If the Commission authorizes termination of KCPL's central station steam distribution service, any phase-out/conversion plan must afford steam service customers adequate time to make informed choices from among the various alternative heating sources and to implement such decisions. Further, such conversion plan should not discriminate between steam customers as regards the dates at which they must incur capital costs and other expenses associated with their conversion to another heating source. KCPL should be required to accommodate (not merely "attempt to accommodate, to the extent practicable") each customer's conversion situation so long as such conversion is fully completed by the date established for complete termination of the steam distribution system.

D. Jackson County Position

Jackson County is in agreement with Staff's position.

Jackson County believes that KCPL has "demarketed" steam service for years in an effort to attract electric heating customers, since it has the glut of electricity. By engaging in unlawful discriminatory promotional practices, it is seeking to erode the

customer base so that there would be no viable steam system for an alternative entity to purchase or a governmental body to condemn.

KCPL should not be allowed to terminate the steam distribution system until it has explored a sale of the system. Any offer to sell should be monitored by the Commission to assure that a bona fide offer is pursued.

E. Intervenor Group Position

The Intervenor Group supports the discontinuance of central district steam heating and also supports the provision of electric boilers or space heating equipment. It should be noted, however, that the Intervenor Group's support for these aspects of the KCPL proposal does not necessarily mean that the Intervenor Group would opt for electric equipment. Rather, the support reflects the Intervenor Group's attitude, in principle, that discontinuance of the steam system is warranted under the circumstances and that KCPL's conversion plan is equitable.

Witness: Mauro (Intervenor Group) - Direct

COMPENSATION FOR TERMINATION

A. Offering of Boilers

1. KCPL Position

KCPL believes that its offer of alternative electric boilers or electric space heating equipment is the most appropriate form of compensation to its steam customers. KCPL does not believe that its Plan violates the promotional practices rules of the Commission; however, if it is deemed to be contrary to such rules, KCPL requests that the Commission allow the Plan as an exception to these rules. KCPL's Plan addresses a unique situation--the phase-out of central station steam service. The Plan covers only existing steam heat customers, and is a means for these customers to maintain their steam service without incurring capital costs. The purpose of the Plan is to alleviate the financial problems facing KCPL's steam customers as central station steam distribution service is phased-out.

KCPL does not oppose KPL Gas Service being authorized to offer free gas boilers, and KCPL being authorized to offer its electric equipment options, to all of KCPL's present steam customers. In this event, those customers who chose the KPL Gas Service-offered equipment should be charged under the applicable gas tariff, and those who chose the KCPL-offered equipment should be charged under the applicable electric service rate. KCPL also does not oppose KPL Gas Service being authorized (if deemed necessary by the Commission) to offer energy audits to all steam customers comparable to those offered by KCPL. KPL's present offer to install gas boilers and chillers, and to charge rates equivalent on a BTU basis to steam rates does not appear to be cost-based; in any event, it is inappropriate for the Commission to authorize KPL to do so outside of a KPL tariff filing case. Further, KCPL is not proposing to offer air conditioning equipment to the steam customers, and thus KPL's proposal to offer chillers is inappropriate.

Witness: Beaudoin (KCPL) - Direct

2. KPL Position

KPL Gas Service maintains that KCPL's proposal to install electric steam boilers violates the Commission's Promotional Practices Rule. However, if the proposal is approved, KPL Gas Service should be allowed to install on-site gas boilers and chillers and to charge rates equivalent on a BTU basis to those set by the Commission for KCPL steam service through 1995. Alternatively, neither KCPL nor KPL Gas Service should be allowed to provide equipment to customers. Customers in such a case would be charged the applicable gas or electric rate.

Witness: Lennan (KPL) - Direct

3. Staff Position (Promotional Practice) -

It is Staff's position that KCPL's proposal to discontinue steam distribution service and provide either electric steam boilers or electric space heating equipment on the premises of its steam customers violates Commission rule 4 CSR 240-14.020, entitled

Promotional Practices. Staff does not believe that KCPL's Plan is an exception to the Promotional Practices rule. Commission Rule 4 CSR 240-14.010(2) provides that a variance to the Promotional Practices rule may be granted by the Commission upon a showing by a utility it is faced with unregulated competition. Staff asserts that no such showing has been made by KCPL.

In the event KCPL's proposal is approved by the Commission, Staff believes that the customers who purchase or are given electric boilers should be treated as electric customers and pay the appropriate electric rate.

Further, Staff maintains that a plan whereby KCPL is allowed to provide on-site electric boilers and KPL is allowed to provide on-site gas boilers and chillers and charge rates equivalent on a BTU basis to those set by the Commission for KCPL steam service violates 4 CSR 240-14.020.

In the event that KPL's proposal is approved by the Commission, Staff believes that customers who convert to electric facilities should be charged the appropriate electric rate and customers who convert to gas facilities should be charged the appropriate gas rate.

Witnesses: Ketter (Staff) - Direct, Rebuttal
Tooey (Staff) - Rebuttal
Haskamp (Staff) - Rebuttal

4. Jackson County Position

Jackson County is in agreement with Staff's position.

Jackson County would add, however, that the offering of electric boilers also violates the provisions of Section 393.130 RSMo and the common law prohibition against undue and unjust discrimination.

5. Intervenor Group Position

The Intervenor Group does not consider KCPL's proposal to be a violation of the Promotional Practices Rule under the circumstances because the affected customers are current KCPL customers, and the outlay of capital for alternative equipment might work a hardship for

some of these customers. In this regard, if the cost of alternative equipment be deemed to be a proper measure of compensation, it is difficult to perceive how the offering of equipment in lieu of cash compensation would be in violation of the Promotional Practices Rule, and the customer should be given the option to choose.

B. Energy Audits

1. KCPL Position

KCPL does not believe that its offer of energy audits violates the Commission's promotional practices rules.

Witness: Graham (KCPL) - Direct

2. Staff Position

It is Staff's position that the energy audits conducted by KCPL violate 4 CSR 240-14.020.

Witness: Ketter (Staff) - Direct

3. Jackson County Position

Jackson County is in agreement with Staff's position.

C. Termination of System if no Boilers are Provided at Less Than Cost

1. KCPL Position

Should the Commission authorize steam distribution service to be terminated on or before December 31, 1990, KCPL commits not to raise base steam rates from their present levels, in order to alleviate to the extent within its power the economic effects of such termination on its steam customers.

Witness: Beaudoin (KCPL) - Direct

2. Staff Position

Staff does not object to the freezing of steam base rates at their current level in the event the Commission authorizes steam service to be terminated on or before December 31, 1990.

Witness: Featherstone (Staff)

3. Jackson County Position

Jackson County's position is in agreement with Staff's position.

4. Intervenor Group Position

The Intervenor Group oppose any rate increase.

RATE INCREASE/APPLICABILITY OF RATES

A. Revenue Deficiency

Staff's Accounting Schedules filed with its direct testimony showed a Gross Revenue Requirement at the mid-point rate of return of \$2,837,301, and a Staff Recommended Revenue Requirement of \$0. The Gross Revenue Requirement was calculated on a traditional revenue requirement basis for an ongoing business. As a result of negotiations with KCP', Staff has revised its calculation to \$3,237,728 at the mid-point rate of return. For the sole purpose of arriving at a negotiated dollar value, KCPL and Staff stipulate that KCPL's steam heat revenue deficiency, based on a traditional revenue requirement basis for an ongoing business is \$3,237,728. Neither KCPL nor Staff shall by this stipulation be deemed to have approved or acquiesced to any ratemaking principle, valuation method or cost of service method. Staff continues to recommend no rate increase for steam service for the reasons stated in the Direct Testimony of Staff Witness Featherstone and summarized below.

B. Three scenarios for rates

1. If KCPL's Plan is rejected

a) KCPL Position

Should KCPL not be authorized to terminate steam distribution service, KCPL will continue to operate its system, and proposes that the \$3.2 million revenue deficiency immediately be reflected in steam rates.

Witness: Beaudoin (KCPL) - Direct

b) Staff Position

In the event the Commission adopts Staff's recommendation that KCPL's Plan should be rejected, Staff recommends that the Commission advise the Company of the conditions under which discontinuance of steam utility service would be permitted including: pursuit of sale of the system, and a showing that the service is no longer viable and the public convenience and necessity does not require its continuation. To keep the sale of system option viable, the Commission should freeze steam rates. If the Commission rejects the Company's Plan, but permits the full \$3.2 million traditional revenue requirement increase to take effect, it would be a de facto approval of the

Plan because the higher rates will likely force customers to leave the system for an alternate heating source.

Witness: Featherstone (Staff) - Direct

c) Jackson County Position

Jackson County is in agreement with Staff's position.

d) Intervenor Group Position

The Intervenor Group opposes a rate increase.

2. If KCPL's Plan is accepted and the Company is authorized to phase out steam service and offer boilers

a) KCPL Position

KCPL proposes that in this event the \$3.2 million revenue deficiency be phased into rates in four equal percentage annual increments of 13.5% each, with no deferral or carrying charge recovery.

Witness: Beaudoin (KCPL) - Direct

b) Staff Position

Staff recommends that the Commission reject the traditional revenue requirement increase (with phase-in) recommended by the Company since traditional ratemaking calculations are not appropriate for an entity that is in the process of discontinuing operation. Rates should be set to reflect the fact that steam utility operations are not an ongoing concern and permit only recovery of prudent out-of-pocket expenses required to continue safe and adequate service or set at a level which would maximize the Company's net income from the system or minimize net losses for the remainder of the phase-out period. The Commission should require KCPL to come forth with information and analysis showing the appropriate rates to be charged during the phase-out period.

Witness: Featherstone (Staff) - Direct

c) Jackson County Position

Jackson County's position is in agreement with Staff's position that traditional ratemaking concepts do not apply and reminds

the Commission of its offer in the Wolf Creek Report and Order at page 36 "to explore alternative pricing strategies." Staff has proposed one alternative. Another alternative may be to set rates based on an optimum system design and utilization of a projected customer base, both of which may have been in existence had KCPL not demarketed steam and allowed the system to deteriorate.

Jackson County would also feel obligated to appeal any Commission decision authorizing KCPL to phase-out steam service and offer boilers.

d) Intervenor Group Position

The Intervenor Group does not disagree with the Staff, but underscores their opposition to a rate increase.

3. If KCPL is allowed to phase out steam service, but not offer boilers

a) KCPL Position

KCPL commits not to raise base steam rates from their present levels, provided that steam distribution service is authorized to terminate on or before December 31, 1990.

Witness: Beaudoin (KCPL) - Direct

b) Staff Position

Staff's prefiled recommendation regarding rates to be charged if KCPL is allowed to phase-out steam service under scenario B above would also apply here. However, since KCPL has offered to freeze steam rates at their existing level for the phase-out period, Staff would not object to that alternative.

Witness: Featherstone (Staff) - Direct

c) Jackson County Position

Jackson County's position is the same as under Section B.2.c) supra, however, since KCPL has offered to freeze steam rates at their existing level for the phase-out period, Jackson County would not object to such rate freeze.

d) Intervenor Group Position

The Intervenor Group does not disagree with Staff, but underscores its opposition to a rate increase.

C. Applicability of Rates to Boilers (Steam versus Electric)

1. KCPL Position

KCPL's Plan proposes that customers who choose electric boilers be charged steam service rates; however, KCPL does not object to the Commission specifying that these customers be charged the applicable electric rate.

Witness: Beaudoin (KCPL) - Direct

2. Staff Position

It is Staff's position that customers who purchase or are given electric boilers should be treated as electric customers and pay the appropriate electric rate.

Witness: Ketter (Staff) - Direct, Rebuttal

3. Jackson County Position

Jackson County is in agreement with Staff's position that customers with electric boilers should pay the appropriate electric rate. Those customers who have been given electric boilers should be given the opportunity to reconnect to the steam system at no charge to such customers.

4. Intervenor Group Position

The Intervenor Group favors the lowest possible rates.

TEST BOILERS

A. Rates to be Applied

1. KCPL Position

KCPL has charged these customers under the steam service rates; however, if the Commission does not approve the termination of steam distribution service and the offer of electric boilers, KCPL does not oppose the Commission specifying that these customers be charged the applicable electric rate. Should the Commission approve the Plan, KCPL's position is as stated in Section 2.A, above.

Witness: Beaudoin (KCPL) - Direct

2. Staff Position

It is Staff's position that steam customers who have had electric boilers installed on their premises should pay the appropriate electric rate.

3. Jackson County Position

It is Jackson County's position that steam customers who have had electric boilers installed on their premises should be given an option to purchase the boilers or reconnect to the steam system. If they elect to purchase the boilers, they should be charged electric rates retroactively to the date such boilers became operational in order to avoid undue discrimination under Section 393.130 RSMo. If they elect to be reconnected to the steam distribution system, they should continue to be charged steam rates. They are innocent victims of KCPL's scheme to sell excess electricity and should not have to pay for KCPL's mistakes. Their election to be reconnected to the steam distribution system would evidence that their intent all along was to be steam customers.

4. Intervenor Group Position

The Intervenor Group favors the lowest possible rates.

B. Purchase of boilers/removal of boilers and reconnection to steam system

1. KCPL Position

KCPL does not believe that its provision of test boilers violates the Commission's promotional practices rules; the customers paid exactly the same rates under the same schedules both before and after the boilers were installed. Should the Commission find that the provision of test boilers are a prohibited promotional practice, KCPL will offer to either sell the boilers to the customers or to reconnect the customers to the steam distribution system (assuming that the Commission does not authorize termination of the system).

Witness: Beaudoin (KCPL) - Direct

2. Staff Position

It is Staff's position that KCPL has violated Commission Rule 4 CSR 240-14.020 by installing test boilers on the premises of certain of its steam customers. Staff contends if the Commission rejects Company's Conversion Plan these customers should be afforded the option of purchasing the boiler.

Witness: Ketter (Staff) - Direct, Rebuttal

3. Jackson County Position

Jackson County has stated its position under Section A.3. supra. It would add, however, that reconnection to the steam distribution system should be an option, whether or not the Commission authorizes termination of the system.

POSITION OF PUBLIC COUNSEL

The Public Counsel supports the position of the Commission Staff in this proceeding.

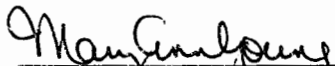
POSITION OF INTERVENOR KANSAS CITY, MISSOURI

Intervenor Kansas City, Missouri supports the Commission Staff in all respects in the instant proceeding.

Respectfully submitted,



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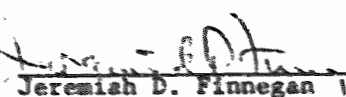
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EXHIBITS
KANSAS CITY POWER AND LIGHT COMPANY
CASE NO. HO-86-139

<u>Exhibit No.</u>	<u>Description Witness/Type (Party)</u>	<u>Marked</u>	<u>Received</u>
_____	Hearing Memorandum		
_____	KCPL Direct Testimony:		
	Besudoin - Direct (KCPL)		
	Mandacina - Direct (KCPL)		
	Graham - Direct (KCPL)		
	*De Stefano - Direct (KCPL)		
	*Kite - Direct (KCPL)		
	*Cattron - Direct (KCPL)		
	*Liberda - Direct (KCPL)		
_____	*Brandel - Direct (Staff)		
_____	*Kuensting - Direct (Staff)		
_____	*White - Direct (Staff)		
_____	*Staff Accounting Schedules		
_____	Featherstone - Direct (Staff)		
_____	Featherstone - Rebuttal (Staff)		
_____	Dahlen - Direct (Staff)		
_____	Miller - Direct (Staff)		
_____	Fuller - Direct (Staff)		
_____	Oligschlaeger - Direct (Staff)		
_____	Oligschlaeger - Schedules (Staff)		
_____	Oligschlaeger - Rebuttal (Staff)		
_____	Tooey - Direct (Staff)		
_____	Tooey - Rebuttal (Staff)		
_____	Haskamp - Direct (Staff)		
_____	Haskamp - Rebuttal (Staff)		
_____	Cox - Direct (Staff)		
_____	Bernsen - Direct (Staff)		
_____	Ketter - Direct (Staff)		
_____	Ketter - Rebuttal (Staff)		
_____	Lennan - Direct (KPL)		
_____	Mauro - Direct (Int.)		

*KCPL and Staff stipulate to admission of these witnesses' testimony into the record and agree to waive cross-examination of these witnesses regarding the traditional revenue requirement calculation.

SCHEDULE OF ISSUES

<u>Date</u>	<u>Issue</u>	<u>Witness (Party)</u>
Monday, April 6	Opening Statements Termination of Central Steam Service Issues	Counsel Beaudoin (KCPL)

Tuesday, April 7	Termination Issues (continued)	Mandacina (KCPL) Graham (KCPL) Featherstone (Staff)

Wednesday, April 8	Termination Issues (continued)	Dahlen (Staff) Miller (Staff) Fuller (Staff)

Thursday, April 9	Termination Issues (continued)	Oligschlaeger (Staff) Tooey (Staff) Haskamp (Staff) Cox (Staff)

Friday, April 10	Termination Issues (continued) *Compensation Issues	Bernsen (Staff) Beaudoin (KCPL) Ketter (Staff) Dahlen (Staff) Featherstone (Staff) Haskamp (Staff) Tooey (Staff) Lennan (KCPL) Mauro (Int.)

Monday, April 13	*Test Boilers	Graham (KCPL) Ketter (Staff)

Tuesday, April 14	*Rate Issues	Beaudoin (KCPL) Featherstone (Staff) Ketter (Staff)

*Cross examination of witnesses may be combined on these issues.