Exhibit No.:
Issue: Minimum Filing Requirements;
Class Cost of Service;
Rate Design;
Changes to Rules and Regulations
Witness: Tim M. Rush
Type of Exhibit: Direct Testimony
Sponsoring Party: Kansas City Power & Light Company
Case No.: ER-2006-____
Date Testimony Prepared: January 27, 2006

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. ER-2006-____

DIRECT TESTIMONY

OF

TIM M. RUSH

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

Kansas City, Missouri
January 2006

DIRECT TESTIMONY

OF

TIM M. RUSH

Case No. ER-2006-____

Q: Please state your name and business address.

A: My name is Tim M. Rush. My business address is 1201 Walnut, Kansas City, Missouri 64106-2124.

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

A: I am employed by Kansas City Power & Light Company ("KCPL" or "Company") as Director, Regulatory Affairs.

Q: What are your responsibilities?

A: My general responsibilities include overseeing the preparation of the rate case, class cost of service and rate design of the Company. I am also responsible for overseeing the regulatory reporting and general activities as they relate to the Missouri Public Service Commission ("MPSC").

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

A: In addition to public schools, I received a Master's Degree in Business Administration from Northwest Missouri State University in Maryville, Missouri. I did my undergraduate study at both the University of Kansas in Lawrence and the University of Missouri in Columbia. I received a Bachelor of Science Degree in Business Administration with a concentration in Accounting from the University of Missouri in Columbia.

Q: Have you previously testified in a proceeding at the MPSC or before any other utility regulatory agency?

A: I have testified on numerous occasions before the MPSC on a variety of issues affecting regulated public utilities.

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to explain how KCPL has satisfied the MPSC's minimum filing requirements ("MFR") and to explain the results of, and how KCPL proposes to implement, the class cost of service study it conducted pursuant to the terms of the Stipulation and Agreement concerning KCPL's Regulatory Plan, which the MPSC approved in Case No. EO-2005-0329 ("Regulatory Plan Stipulation and Agreement"). My direct testimony will also discuss KCPL's proposed rate design and changes to the Company's General Rules and Regulations, as set forth in its Missouri tariffs ("Missouri Rules").

I. MINIMUM FILING REQUIREMENTS

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

A: My purpose is to confirm that KCPL has satisfied the MPSC's MFR, as set forth in 4 CSR § 240-3.030 and 4 CSR § 240-3.160.

Q: How did KCPL satisfy the MFR?

A: The following information was prepared addressing 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.

Q: Are you sponsoring this information?

A: Yes, I am.

Q: Was this information prepared under your direct supervision?

A: Yes, it was.

Q: Were the provisions of 4 CSR 240-3.160 also addressed, concerning a depreciation study, database and property unit catalog?

A: Pursuant to 4 CSR § 240-3.160(1)(A), the Company is not required to submit the information included in this section with this filing because the MPSC staff has received these items from the Company within the three years prior to the Company filing for a general increase. The depreciation and amortization rates used in the preparation are found in Appendix G-1 through G-3 of the Regulatory Plan Stipulation and Agreement.

II. ELECTRIC RATE DESIGN

1. Cost of Service

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

A: Yes, I am.

Q: Please describe generally the electric tariffs and the proposed changes and how the rate design set out in these tariffs was developed.

A: The proposed tariffs and rate design are the result of an extensive effort on the part of KCPL to determine the Company's appropriate cost of providing service and the appropriate rate design. The general goal of the Company's electric rate design as contained in the proposed tariffs is to provide reasonable energy prices that encourage the efficient use of electricity while at the same time allowing a reasonable return on investment. The Company developed a class cost of service ("COS") study as set out in the Regulatory Plan Stipulation and Agreement. The class COS study was used to help develop the appropriate revenues for each class of service. KCPL witness Lois J. Liechti is sponsoring the testimony on the development of the class COS study.

Q: What is the purpose of a class COS study?

A: The purpose of a class COS study is to determine the return on rate base of each class of customer served in relation to the total Company return on rate base. Such a study provides guidance to determine if any adjustments are necessary in the class revenue requirements. The conclusions from the class COS study performed in this case appear as Schedule LJL-1, pages 1 through 3, attached to the testimony of Lois J. Liechti.

Q: What did the results of the study show?

A: The results indicate that the residential class is not providing a comparable return on rate base in comparison to all other major classes of customers. The results of the class cost of service show a return in the residential class that is 74% of the overall average. This is

shown by looking on line 0430 of LJL-1, page 1 of 3. The overall rate of return, line 0420 is 7.416% for the Missouri retail, column 601 and the residential class has a return of 5.497%. This latter amount is 74% of the overall return. This demonstrates that the residential class is not earning an equal return to the other classes. Small General Service Class is 11% above the overall average rate of return. Medium General Service is 40% above the overall return. Large General Service is 21% above the overall average and Large Power Service is 12% above the average. The column 607, Off-Peak Lighting was not used, but the results were all included in the Other Lighting Class, column 608. This class showed a rate of return that was 39% of the overall average.

Q. What kind of increases in rates would be required to each class have each class provide the average rate of return?

A. In order to provide an equal return on rate base for all classes of customers, the residential class revenues would have to be increased by 7.45% and the small, medium, large general service classes and large power class would have to be reduced by 2.99%, 9.04%, 4.60% and 2.29%, respectively. The Other Lighting Class would be increased by 10.30%. The results of levelizing the classes is shown on page 2 of Schedule LJL-1 on line 0880. If the Company were to recommend these changes, the changes would be made in addition to the requested increase of the Company. The Company is requesting an overall increase of 11.45%. To reflect the changes described above and the overall increase request would result in an increase to the residential class of nearly 20%.

Q: What rate adjustments are being proposed for each class?

A: The Company does not propose to change the current relationship of customer class returns to the average jurisdictional return. The Company is recommending an equal percentage increase be to all customer classes with minimal changes to rate design.

Q: Why are you not suggesting changes to customer class revenues based on the outcome of the class COS study?

A: KCPL completed a class COS and rate design case in 1996. This case included major restructuring of all rate schedules and included shifts of revenue between classes to move class returns closer to the average jurisdictional return. It is the Company's position that any additional shift in revenue requirement among classes for the purpose of achieving equal returns of all classes is more appropriately addressed in a future rate design case. KCPL has not requested an increase in rates in over twenty years. Some disparity between customer class rates of return has been in existence for the entire twenty year period and perhaps as long as fifty years. KCPL does not believe it is appropriate to increase any class of customer rates higher than the average in this case. Minimal movement toward average rate of return would be required to minimize the impact on individual customers' bills. It is KCPL's position that even a minimal increase above average would add undue burden on those customers at this time. In addition, a class COS study is only a guide and provides cost by class for only a particular point in time. Because of the significant investments the Company is making, including investments in customer programs designed to assist customers in managing their energy bill, it is premature to align average class rates of return in this case. It is KCPL's belief that the appropriate time to move toward equal rate of return for all customer classes is after completion of the Regulatory Plan and the in-service date of the base load coal plant.

Subsequent to that case it may be appropriate to file another rate design case based on a revenue neutral jurisdictional revenue requirement that would result in minimizing a one-time impact of any particular customer or class of customer.

2. Rate Design

Q: Describe the general approach and the proposed modification for each electric rate design change that KCPL is recommending in this proceeding.

A: With the exception of space-heating rates, residential service charges, adjustments related to revised line losses for commercial and industrial customers and some clean up of our tariffs, KCPL's proposed rates reflect equal percentage increases for all charges.

Q: How is the increase to the residential class to be implemented?

A: Schedule TMR-1, page 1 outlines the proposed residential rate adjustments. In general, we are proposing to maintain the current relationship of rate design within the residential class, except to increase the service charge by a larger percentage than the other rate components. The reason for increasing the service charge is to more closely approximate the cost of providing this service. The overall class rate adjustment is then adjusted by the overall percentage and reflects the average of the overall rate request by the Company. The overall proposed change in rates for the residential class is equal to the average. KCPL provides separate meter space heating to customers with two meters. One meter includes general usage and the other includes space-heating usage. The practice of having two meters was initiated years ago when the electric heating market was first developing and usually the loads could be separated. We are recommending to no longer offer separate meter space-heating for new residential customers. Separate

meter space-heating will continue to be available to those existing customers who have this service.

Q: How are you proposing to modify the small, medium and large general service classes and the large power class rates?

A: The classes consist of numerous rate codes, which are differentiated by voltage level and all-electric versus general usage categories for all commercial and industrial customers. We propose to maintain the same rate classifications with several modifications within some of the categories. The Company recently completed a line loss study, which was part of the Regulatory Plan Stipulation and Agreement. The results of the line loss study were used in the class COS study and we are proposing to use the line loss study to differentiate voltage level rates. Second, we are proposing to adjust each of the all-electric winter energy charge rates by 5% above the average increase in the overall class. While making this recommendation, we are also proposing to change the availability section in the all-electric rates to allow customers who are not all-electric, but whose primary heating source is electric heat, to qualify for this rate. We currently offer separate meter space heating in each of the rates schedules for both primary and secondary service. We do not have any customers under the primary voltage level separate meter space-heating category and are recommending deleting this provision. We also have service charges within each rate schedule that vary based on the size of the customer. We are recommending deleting those service charges where we do not have customers or the customer usage characteristics would be such as they should be on another rate schedule. These latter two changes are essentially clean-up and simplification changes from the rate design case in 1996. We are also recommending

removing the provisions that established a different method for calculating facilities charges for customers who were on a specific rate in 1996, the time that the rate design case went into effect. The classes' overall rate adjustments reflect the average of the overall rate request by the Company.

Q: How are you proposing to modify the lighting class?

A: The lighting class consists of numerous rate codes, which include customer-owned off-peak street lighting, traffic signals and street lighting. We propose to maintain the same rate classifications and to increase each rate component by the average increase proposed for the Company. For the customer owned lighting schedule, we are proposing to simplify the calculation from a multiple step rate to a single charge per Kwh. The overall class increase is 11.46% to each of the tariffs.

Q: What impact do the changes in rates have on the residential general use class?

A: Attached and marked as Schedule TMR-2 is a comparison for various usage levels of typical residential general use class customers.

Q. Are there any other changes the Company is recommending?

A: Yes, we are proposing several modifications in the Rules and Regulations of the Company.

III. RULES AND REGULATIONS

Q: Does KCPL's filing address changes to the Company's Missouri Rules?

A: Yes, another part of the rate making and planning process has been to look at KCPL's Missouri Rules. We have identified three broad, guiding themes for review: (i) adding clarity, where needed; (ii) providing for consistency; and (iii) simplifying the existing Missouri Rules to better serve customers.

Q: Would you discuss, in greater detail, what is meant by adding clarity to the Missouri Rules?

A: We are seeking to clarify our Missouri Rules by providing clearer definitions. For instance, in our current rules and regulations we use the word "Adult," however, that word is not defined. To address this and similar issues, we are proposing to add ten (10) new definitions to the Missouri Rules: Adult, Billing Error, Field Error, Fraud, Individual Liability, Meter Error, Responsible Party, Tampering, Time of Application. and Unauthorized Use.

We recommend clarifying the treatment of "Other Extensions" in Missouri Rule 9.02. As currently written, a customer could infer that the rule for Other Extensions may be applied for line extensions for temporary service. To eliminate this possible misunderstanding, we are proposing revisions to the language by adding the word "permanent" to the opening sentence.

Q: How would you, generally, describe what you refer to as providing for consistency in the Missouri Rules?

A: The first area is the returned check charge. We recommend bringing our insufficient check charge amount more in line with our cost of providing this service. In Missouri, the current charge is ten-dollars ($10). We are recommending a change to the Missouri charge to thirty dollars ($30), which is in line with our actual costs of processing and collecting on a returned check. We are also requesting this change in Kansas.

We also propose to implement the use of credit and debit cards as a means of payment for residential customers with no fee charge to the customer. Under Missouri Rule 4.03, we recommend including language to define that bills for residential service may be paid by

means of check, cash, credit or debit card. The basis for this recommendation is contained in the direct testimony of KCPL witness Susan K. Nathan. Additionally, we are recommending in Missouri to discontinue the practice of allowing third parties to charge a fee of up to one dollar ($1.00) at pay stations. We currently do not allow pay stations to charge a collection fee in Kansas and it is our intent for consistency to implement this practice in Missouri. With all of the payment options available, we believe that allowing multiple options at no cost provides customers the best means for paying for service.

KCPL is also recommending changing its deposit interest rate for Missouri customers, as set forth in Missouri Rule 2.07(D). We recommend a deposit rate consistent among commercial, industrial and residential customers equal to the federal reserve prime rate plus 1%. Currently, KCPL pays nine percent (9%) on deposits to customers in Missouri. This change is similar to other major utilities in the state deposit practice. Maintaining the current fixed deposit rate does not account for the changes that occur in interest rates over time.

KCPL proposes to remove the reference to "Seasonal" service from Missouri Rule 2.06 as the Company ceased providing Seasonal Rates, Amusement Parks, Baseball Fields, and Christmas Tree Lots, etc., with rate changes for Missouri in 1996.

Q: You mentioned simplification, what sorts of changes do you propose to simplify matters for Customers and Customer Care personnel?

A: First, each of our Missouri and Kansas jurisdictions has its own electric line extension rules for single-phase, single-family dwellings for residential customers. In Missouri, the rule provides the Customer 210 feet of Company facilities at no cost to the customer.

In Kansas, the rule provides up to one-quarter mile onto the customer's property. Our recommendation is to change the Missouri rule to the current extension language in the Kansas rule. This change would then give Missouri customers the same one-quarter mile benefit as our Kansas customers. This change will also provide consistency between our Missouri and Kansas jurisdictions and simplify the work of customer care personnel.

Within the context of single-phase, single family residential extensions, we are proposing a change in the monthly recovery rate applied to amounts customers owe in excess of costs provided by KCPL for residential customer extensions. We recommend modifying this provision to provide more flexibility in arranging payments.

Another area of simplification for our customers and employees has been dealing with customer needs for provision of service beyond what is normally provided a similarly situated customer. In an effort to add simplicity to our relationships with customers between Missouri and Kansas, and to provide a basis for our employees in their dealings with customers in these matters, we are recommending an "Excess Facilities Charge." The Excess Facilities Charge is a charge to customers for facilities and services above and beyond the normal amount required for providing service.

The last suggested change regarding simplification is combining the rules for "Liability of Company" and "Continuity of Service," Missouri Rules 3.17 and 3.09, respectively. The language found in each of these sections is identical. We are simply recommending that we consolidate the two rules into one, with a general heading that covers both Liability and Continuity.

Q: Does that conclude your testimony?

A: Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas City Power & Light Company to Modify Its Tariff to Begin the Implementation of Its Regulatory Plan	)))	Case No. ER-2006-____

AFFIDAVIT OF TIM M. RUSH

STATE OF MISSOURI)
) **ss**
COUNTY OF JACKSON)

Tim M. Rush, being first duly sworn on his oath, states:

1. My name is Tim M. Rush. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Director, 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 twelve (12) pages and Schedules TMR-1 and TMR-2, all of which 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.

Tim M. Rush

Subscribed and sworn before me this 27th day of January 2006.

Notary Public

My commission expires:

CAROL SIVILS
Notary Public - Notary Seal
STATE OF MISSOURI
Clay County
My Commission Expires: June 15, 2007

RESIDENTIAL GENERAL SERVICES
SUMMARY OF PROPOSAL SCENARIOS
MISSOURI

http://spportal01/CaseWorks/5/DirectTestimony_Rush/Library/[MO TMR-1.xls]MO Residential

INPUT FOR MODEL	Cust Chg	Current Rates	Proposed Rates	Overall Increase (%)
CUSTOMER CHARGE				
One Meter		6.11	8.36	36.82%
Two Meters		7.56	10.03	32.67%
ENERGY CHARGE				
Summer Rate				
0-600		0.0740	0.0814	10.00%
600-1000		0.0740	0.0814	10.00%
1000+		0.0740	0.0814	10.00%
Winter Rates				
Winter Gen - RESA/RESC				
0-600		0.0666	0.0674	1.20%
600-1000		0.0398	0.0513	28.89%
1000+		0.0332	0.0379	14.16%
Winter Gen&S/H - RESB				
0-600		0.0468	0.0513	9.62%
600-1000		0.0468	0.0513	9.62%
1000+		0.0326	0.0375	15.03%
Sep Space Heat Mtr				
Winter		0.0318	0.0375	17.92%
Summer		0.0740	0.0814	10.00%
T-O-U (RTOD)				
Customer Charge		9.42	10.50	11.46%
Summer On-Peak		0.1134	0.1264	11.46%
Summer Off-Peak		0.0632	0.0704	11.39%
Winter		0.0468	0.0522	11.54%

SMALL GENERAL SERVICES
SUMMARY OF PROPOSAL SCENARIOS
MISSOURI

http://spportal01/CaseWorks/5/DirectTestimony_Rush/Library/[MO TMR-1.xls]MO Small General

INPUT FOR MODEL			
	Cust Chg	Current Rates	Proposed Rates	Overall Increase (%)
A. CUSTOMER CHARGE				
Metered Service:				-
0-24 KW		11.18	12.46	11.45%
25-199 KW		30.98	34.53	11.46%
200-999 KW		62.92	34.53	-45.12%
1001+ KW		537.24	34.53	-93.57%
Unmetered Service		4.68	5.22	11.54%
Separately Metered Space Heat		1.45	1.62	11.72%
B. FACILITIES CHARGE				
SECONDARY:				-
0-25 KW		-	0	-
26+ KW		1.840	2.051	11.47%
PRIMARY:				
0-26 KW		-	0	-
27+ KW		1.802	2.009	11.49%
C. ENERGY CHARGE				-
SECONDARY-SUMMER:				-
0-180 hrs use per month		0.10071	0.1121	11.31%
181-360 hrs use per month		0.04779	0.0532	11.32%
361+ hrs use per month		0.04257	0.0474	11.35%
SECONDARY-WINTER:				-
0-180 hrs use per month		0.07826	0.0872	11.42%
181-360 hrs use per month		0.03820	0.0426	11.52%
361+ hrs use per month		0.03447	0.0387	12.27%
PRIMARY-SUMMER:				
0-180 hrs use per month		0.09870	0.1096	11.04%
181-360 hrs use per month		0.04683	0.0519	10.83%
361+ hrs use per month		0.04172	0.0463	10.98%
PRIMARY-WINTER:				
0-180 hrs use per month		0.07669	0.0852	11.10%
181-360 hrs use per month		0.03743	0.0416	11.14%
361+ hrs use per month		0.03378	0.0378	11.90%
SECONDARY-WINTER - ALL ELECTRIC				
0-180 hrs use per month		0.05348	0.0626	17.05%
181-360 hrs use per month		0.03392	0.0399	17.63%
361+ hrs use per month		0.03392	0.0382	12.62%
PRIMARY-WINTER - ALL ELECTRIC				
0-180 hrs use per month		0.05242	0.0612	16.75%
181-360 hrs use per month		0.03324	0.0390	17.33%
361+ hrs use per month		0.03324	0.0373	12.21%
D. SEPARATELY METERED S/H-WINTER				
SECONDARY		0.03447	0.038	10.24%
PRIMARY		0.03378	0.038	12.49%

MEDIUM GENERAL SERVICE
SUMMARY OF PROPOSAL SCENARIOS
MISSOURI

http://spportal01/CaseWorks/5/DirectTestimony_Rush/Library/[MO TMR-1.xls]MO Med General

INPUT FOR MODEL	Cust Chg	Current Rates	Proposed Rates	Overall Increase (%)
A: CUSTOMER CHARGE				-
0-24 KW		30.98	34.53	11.46%
25-199 KW		30.98	34.53	11.46%
200-999 KW		62.92	34.53	-45.12%
1001+ KW		537.24	34.53	-93.57%
Separately Metered Space Heat		1.45	1.62	11.72%
B: FACILITIES CHARGE				-
SECONDARY:				-
PRIMARY:		1.84	2.051	11.47%
		1.53	1.705	11.44%
C: DEMAND CHARGE				-
SECONDARY-SUMMER:				-
SECONDARY-WINTER		2.544	2.836	11.48%
PRIMARY-SUMMER		1.294	1.442	11.44%
PRIMARY-WINTER		2.493	2.771	11.15%
SECONDARY-WINTER - ELEC ONLY		1.268	1.409	11.12%
PRIMARY-WINTER - ELEC ONLY		1.834	2.044	11.45%
		1.798	1.998	11.12%
D: ENERGY CHARGE				-
SECONDARY-SUMMER:				-
0-180 hrs use per month		0.06651	0.0740	11.26%
181-360 hrs use per month		0.04543	0.0506	11.38%
361+ hrs use per month		0.03839	0.0428	11.49%
SECONDARY-WINTER:				-
0-180 hrs use per month		0.05745	0.0639	11.23%
181-360 hrs use per month		0.03445	0.0383	11.18%
361+ hrs use per month		0.02896	0.0322	11.19%
PRIMARY-SUMMER:				
0-180 hrs use per month		0.06519	0.0723	10.91%
181-360 hrs use per month		0.04452	0.0495	11.19%
361+ hrs use per month		0.03763	0.0418	11.08%
PRIMARY-WINTER:				
0-180 hrs use per month		0.05630	0.0624	10.83%
181-360 hrs use per month		0.03376	0.0375	11.08%
361+ hrs use per month		0.02838	0.0314	10.64%
SECONDARY-WINTER - ALL ELECTRIC				
0-180 hrs use per month		0.03520	0.0411	16.76%
181-360 hrs use per month		0.02318	0.0275	18.64%
361+ hrs use per month		0.02123	0.0246	15.87%
PRIMARY-WINTER - ALL ELECTRIC				
0-180 hrs use per month		0.03449	0.0402	16.56%
181-360 hrs use per month		0.02272	0.0269	18.40%
361+ hrs use per month		0.02080	0.0241	15.87%
E: SEPARATELY METERED S/H-WINTER				
SECONDARY		0.02896	0.0322	11.19%
PRIMARY		0.02838	0.0314	10.64%
F: REACTIVE DEMAND ADJUSTMENT		0.452	0.504	11.50%

LARGE GENERAL SERVICE
SUMMARY OF PROPOSAL SCENARIOS
MISSOURI

http://spportal01/CaseWorks/5/DirectTestimony_Rush/Library/[MO TMR-1.xls]MO Large General

INPUT FOR MODEL			
	Cust Chg	Current Rates	Proposed Rates	Overall Increase (%)
A: CUSTOMER CHARGE				-
	0-24 KW	62.92	70.13	11.46%
	25-199 KW	62.92	70.13	11.46%
	200-999 KW	62.92	70.13	11.46%
	1001+ KW	537.24	598.81	11.46%
	Separately Metered Space Heat	1.45	1.62	11.72%
				-
B: FACILITIES CHARGE				-
	SECONDARY:	1.84	2.051	11.47%
	PRIMARY:	1.53	1.705	11.44%
				-
C: DEMAND CHARGE				-
	SECONDARY-SUMMER:	3.680	4.102	11.47%
	SECONDARY-WINTER	1.981	2.208	11.46%
	PRIMARY-SUMMER	3.607	4.007	11.09%
	PRIMARY-WINTER	1.941	2.157	11.13%
	SECONDARY-WINTER - ELEC ONLY	1.834	2.044	11.45%
	PRIMARY-WINTER - ELEC ONLY	1.798	1.997	11.07%
				-
D: ENERGY CHARGE				-
	SECONDARY-SUMMER:			
	0-180 hrs use per month	0.05405	0.0593	9.71%
	181-360 hrs use per month	0.04114	0.0454	10.35%
	361+ hrs use per month	0.03216	0.0354	10.07%
	SECONDARY-WINTER:			-
	0-180 hrs use per month	0.04969	0.0548	10.28%
	181-360 hrs use per month	0.03161	0.0349	10.41%
	361+ hrs use per month	0.02712	0.0301	10.99%
	PRIMARY-SUMMER:			
	0-180 hrs use per month	0.05297	0.0581	9.68%
	181-360 hrs use per month	0.04032	0.0444	10.12%
	361+ hrs use per month	0.03152	0.0347	10.09%
	PRIMARY-WINTER:			
	0-180 hrs use per month	0.04869	0.0536	10.08%
	181-360 hrs use per month	0.03098	0.0341	10.07%
	361+ hrs use per month	0.02658	0.0292	9.86%
	SECONDARY-WINTER - ALL ELECTRIC			
	0-180 hrs use per month	0.03520	0.0412	17.05%
	181-360 hrs use per month	0.02318	0.0272	17.34%
	361+ hrs use per month	0.02123	0.0251	18.23%
	PRIMARY-WINTER - ALL ELECTRIC			
	0-180 hrs use per month	0.03449	0.0402	16.56%
	181-360 hrs use per month	0.02272	0.0265	16.64%
	361+ hrs use per month	0.02080	0.0245	17.79%
E: SEPARATELY METERED S/H-WINTER				
	SECONDARY	0.02712	0.0302	11.36%
	PRIMARY	0.02658	0.0295	10.99%
F: REACTIVE DEMAND ADJUSTMENT		0.452	0.504	11.50%

LARGE POWER SERVICE
SUMMARY OF PROPOSAL SCENARIOS
MISSOURI

http://spportal01/CaseWorks/5/DirectTestimony_Rush/Library/[MO TMR-1.xls]MO Large Power

INPUT FOR MODEL Cust Chg	Current Rates	Proposed Rates	Overall Increase (%)
A. CUSTOMER CHARGE			-
	537.24	598.81	11.46%
	-	0	
	-	0	
B. FACILITIES CHARGE			
SECONDARY	1.840	2.051	11.47%
PRIMARY	1.530	1.705	11.44%
SUBSTATION VOLTAGE	0.463	0.516	11.45%
TRANSM VOLTAGE	-	0	0.00%
			-
C. DEMAND CHARGE			-
SECONDARY-SUMMER			-
First 2450 kw	7.138	7.956	11.46%
Next 2450 kw	5.710	6.364	11.45%
Next 2450 kw	4.783	5.331	11.46%
All kw over 7350 kw	3.492	3.892	11.45%
SECONDARY-WINTER			
First 2450 kw	4.852	5.408	11.46%
Next 2450 kw	3.787	4.221	11.46%
Next 2450 kw	3.341	3.724	11.46%
All kw over 7350 kw	2.571	2.866	11.47%
PRIMARY-SUMMER			
First 2500 kw	6.996	7.773	11.11%
Next 2500 kw	5.596	6.218	11.12%
Next 2500 kw	4.687	5.209	11.14%
All kw over 7500 kw	3.422	3.803	11.13%
PRIMARY-WINTER			
First 2500 kw	4.755	5.283	11.10%
Next 2500 kw	3.711	4.124	11.13%
Next 2500 kw	3.274	3.638	11.12%
All kw over 7500 kw	2.520	2.800	11.11%
SUBSTATION-SUMMER			
First 2520 kw	6.940	7.682	10.69%
Next 2520 kw	5.551	6.146	10.72%
Next 2520 kw	4.649	5.147	10.71%
All kw over 7560 kw	3.395	3.758	10.69%
SUBSTATION-WINTER			
First 2520 kw	4.717	5.222	10.71%
Next 2520 kw	3.681	4.076	10.73%
Next 2520 kw	3.248	3.596	10.71%
All kw over 7560 kw	2.499	2.768	10.76%
TRANSMISSION-SUMMER			
First 2541 kw	6.883	7.614	10.62%
Next 2541 kw	5.507	6.090	10.59%

LARGE POWER SERVICE
SUMMARY OF PROPOSAL SCENARIOS
MISSOURI

http://spportal01/CaseWorks/5/DirectTestimony_Rush/Library/[MO TMR-1.xls]MO Large Power

INPUT FOR MODEL	Current Rates	Proposed Rates	Overall Increase (%)
Cust Chg	4.613	5.102	10.60%
Next 2541 kw	3.367	3.725	10.63%
All kw over 7623 kw			
TRANSMISSION-WINTER			
First 2541 kw	4.678	5.175	10.62%
Next 2541 kw	3.652	4.039	10.60%
Next 2541 kw	3.222	3.563	10.58%
All kw over 7623 kw	2.479	2.742	10.61%
D. ENERGY CHARGE			
SECONDARY-SUMMER:			
0-180 hrs use per month	0.04470	0.0498	11.41%
181-360 hrs use per month	0.03109	0.0347	11.61%
361+ hrs use per month	0.02230	0.0250	12.11%
SECONDARY-WINTER:			
0-180 hrs use per month	0.03790	0.0422	11.35%
181-360 hrs use per month	0.02828	0.0315	11.39%
361+ hrs use per month	0.02210	0.0247	11.76%
PRIMARY-SUMMER:			
0-180 hrs use per month	0.04381	0.0487	11.16%
181-360 hrs use per month	0.03047	0.0339	11.26%
361+ hrs use per month	0.02186	0.0244	11.62%
PRIMARY-WINTER:			
0-180 hrs use per month	0.03714	0.0412	10.93%
181-360 hrs use per month	0.02771	0.0308	11.15%
361+ hrs use per month	0.02165	0.0242	11.78%
SUBSTATION-SUMMER			
0-180 hrs use per month	0.04346	0.0482	10.91%
181-360 hrs use per month	0.03023	0.0334	10.49%
361+ hrs use per month	0.02168	0.0241	11.16%
SUBSTATION-WINTER			
0-180 hrs use per month	0.03684	0.0408	10.75%
181-360 hrs use per month	0.02749	0.0304	10.59%
361+ hrs use per month	0.02148	0.0239	11.27%
TRANSMISSION-SUMMER			
0-180 hrs use per month	0.04311	0.0477	10.65%
181-360 hrs use per month	0.02999	0.0332	10.70%
361+ hrs use per month	0.02151	0.0239	11.11%
TRANSMISSION-WINTER			
0-180 hrs use per month	0.03655	0.0405	10.81%
181-360 hrs use per month	0.02727	0.0302	10.74%
361+ hrs use per month	0.02131	0.0236	10.75%
E. REACTIVE DEMAND ADJUSTMENT	0.452	0.504	11.50%

KCPL PROPOSED RESIDENTIAL BASE RATE - TYPICAL BILL IMPACT ANALYSIS
RATE A - GENERAL USE
MISSOURI

E:\Regulatory\COS\05-ClassCOS\Rate Case Schedules\[MO TMR-2.xls]MO RES-Rate A - DESIGN

Current GENERAL USE Schedule		Proposed GENERAL USE Schedule	
Customer Charge	$6.11	Customer Charge	$8.36
Summer:		Summer:	
First 600	$0.0740	First 600	$0.0814
Next 400	$0.0740	Next 400	$0.0814
Over 1000	$0.0740	Over 1000	$0.0814
Winter:		Winter:	
First 600	$0.0666	First 600	$0.0674
Next 400	$0.0398	Next 400	$0.0513
Over 1000	$0.0332	Over 1000	$0.0379

average usage

AVERAGE MONTHLY USAGE

SUMMER KWH USAGE			WINTER KWH USAGE							
			0	200	500	750	1000	1250	1500	2000	3000
		Customer Charge	Winter Bill								
0	Current	$ 6.11	$ 19.43	$ 39.41	$ 52.04	$ 61.99	$ 70.29	$ 78.59	$ 95.19	$ 128.39	
	Proposed	$ 8.36	$ 21.84	$ 42.06	$ 56.50	$ 69.32	$ 78.80	$ 88.27	$ 107.22	$ 145.12	
	Change	36.82%	12.40%	6.72%	8.57%	11.82%	12.11%	12.32%	12.64%	13.03%	
		Summer Bill	Annual (4 summer and 8 winter months)								
300	Current	$ 28.31	$ 268.68	$ 428.52	$ 529.56	$ 609.16	$ 675.56	$ 741.96	$ 874.76	$ 1,140.36	
	Proposed	$ 32.78	$ 305.84	$ 467.60	$ 583.12	$ 685.68	$ 761.52	$ 837.28	$ 988.88	$ 1,292.08	
	Change	15.79%	13.83%	9.12%	10.11%	12.56%	12.72%	12.85%	13.05%	13.30%	
600	Current	$ 50.51	$ 357.48	$ 517.32	$ 618.36	$ 697.96	$ 764.36	$ 830.76	$ 963.56	$ 1,229.16	
	Proposed	$ 57.20	$ 403.52	$ 565.28	$ 680.80	$ 783.36	$ 859.20	$ 934.96	$ 1,086.56	$ 1,389.76	
	Change	13.24%	12.88%	9.27%	10.10%	12.24%	12.41%	12.54%	12.77%	13.07%	
700	Current	$ 57.91	$ 387.08	$ 546.92	$ 647.96	$ 727.56	$ 793.96	$ 860.36	$ 993.16	$ 1,258.76	
	Proposed	$ 65.34	$ 436.08	$ 597.84	$ 713.36	$ 815.92	$ 891.76	$ 967.52	$ 1,119.12	$ 1,422.32	
	Change	12.83%	12.66%	9.31%	10.09%	12.14%	12.32%	12.46%	12.68%	12.99%	
850	Current	$ 69.01	$ 431.48	$ 591.32	$ 692.36	$ 771.96	$ 838.36	$ 904.76	$ 1,037.56	$ 1,303.16	
	Proposed	$ 77.55	$ 484.92	$ 646.68	$ 762.20	$ 864.76	$ 940.60	$ 1,016.36	$ 1,167.96	$ 1,471.16	
	Change	12.38%	12.39%	9.36%	10.09%	12.02%	12.20%	12.33%	12.57%	12.89%	
1000	Current	$ 80.11	$ 475.88	$ 635.72	$ 736.76	$ 816.36	$ 882.76	$ 949.16	$ 1,081.96	$ 1,347.56	
	Proposed	$ 89.76	$ 533.76	$ 695.52	$ 811.04	$ 913.60	$ 989.44	$ 1,065.20	$ 1,216.80	$ 1,520.00	
	Change	12.05%	12.16%	9.41%	10.08%	11.91%	12.08%	12.23%	12.46%	12.80%	
1200	Current	$ 94.91	$ 535.08	$ 694.92	$ 795.96	$ 875.56	$ 941.96	$ 1,008.36	$ 1,141.16	$ 1,406.76	
	Proposed	$ 106.04	$ 598.88	$ 760.64	$ 876.16	$ 978.72	$ 1,054.56	$ 1,130.32	$ 1,281.92	$ 1,585.12	
	Change	11.73%	11.92%	9.48%	10.08%	11.78%	11.95%	12.09%	12.33%	12.68%	
1500	Current	$ 117.11	$ 623.88	$ 783.72	$ 884.76	$ 964.36	$ 1,030.76	$ 1,097.16	$ 1,229.96	$ 1,495.56	
	Proposed	$ 130.46	$ 696.56	$ 858.32	$ 973.84	$ 1,076.40	$ 1,152.24	$ 1,228.00	$ 1,379.60	$ 1,682.80	
	Change	11.40%	11.65%	9.52%	10.07%	11.62%	11.79%	11.93%	12.17%	12.52%	
1980	Current	$ 152.63	$ 765.96	$ 925.80	$ 1,026.84	$ 1,106.44	$ 1,172.84	$ 1,239.24	$ 1,372.04	$ 1,637.64	
	Proposed	$ 169.53	$ 852.84	$ 1,014.60	$ 1,130.12	$ 1,232.68	$ 1,308.52	$ 1,384.28	$ 1,535.88	$ 1,839.08	
	Change	11.07%	11.34%	9.59%	10.06%	11.41%	11.57%	11.70%	11.94%	12.30%	
3000	Current	$ 228.11	$ 1,067.88	$ 1,227.72	$ 1,328.76	$ 1,408.36	$ 1,474.76	$ 1,541.16	$ 1,673.96	$ 1,939.56	
	Proposed	$ 252.56	$ 1,184.96	$ 1,346.72	$ 1,462.24	$ 1,564.80	$ 1,640.64	$ 1,716.40	$ 1,868.00	$ 2,171.20	
	Change	10.72%	10.96%	9.69%	10.05%	11.11%	11.25%	11.37%	11.59%	11.94%	