Exhibit No.: Issues: Witness: Sponsoring Party: Type of Exhibit: Case No.: Date Testimony Prepared:

True-Up Rate Design James A. Busch MO PSC Staff True-up Direct Testimony ER-2006-0315 September 27, 2006

### **MISSOURI PUBLIC SERVICE COMMISSION**

# UTILITY OPERATIONS DIVISION

FILED NOV 2 8 2006

Missouri Public Service Commission

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**TRUE-UP DIRECT TESTIMONY** 

OF

JAMES A. BUSCH

## THE EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2006-0315

Jefferson City, Missouri September 2006

Case No(s). Date 1.70

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# **BEFORE THE PUBLIC SERVICE COMMISSION**

### **OF THE STATE OF MISSOURI**

In the matter of The Empire District ) Electric Company of Joplin, Missouri for ) authority to file tariffs increasing rates for ) electric service provided to customers in ) the Missouri service area of the Company. )

Case No. ER-2006-0315

### AFFIDAVIT OF JAMES A. BUSCH

STATE OF MISSOURI ) ) ss COUNTY OF COLE )

James A. Busch, of lawful age, on his oath states: that he has participated in the preparation of the following True-up Direct Testimony in question and answer form, consisting of 3 pages of True-up Direct Testimony to be presented in the above case, that the answers in the following True-up Direct Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

James A. Busch

Subscribed and sworn to before me this  $\frac{1}{2}$  day of September, 2006.

Hake



DAWN L. HAKE Notary P My Commission Expires March 16, 2009 Cole County Commission #95497843

My commission expires

1		TRUE-UP DIRECT TESTIMONY
2 3		OF
4 5		JAMES A. BUSCH
6 7		THE EMPIRE DISTRICT ELECTRIC COMPANY
8 9		CASE NO. ER-2006-0315
10 11		
12 13	Q.	Please state your name and business address.
14 15	A.	My name is James A. Busch and my business address is P. O. Box 360,
16		, Missouri 65102.
	•	
17	Q.	Are you the same James A. Busch that testified earlier in this case?
18	А.	Yes I am.
19	Q.	What is the purpose of this true-up direct testimony?
20	А.	I present Staff's updated rate design schedules. The Staff originally presented
21	its rate design	schedules in Schedules DCR-1 to DCR-4 attached to the direct testimony of
22	Staff witness	David C. Roos. The accounting data Staff used to create Schedules DCR-1 to
23	DCR-4 has c	hanged as a result of the true-up; therefore, I am updating the rate design
24	schedules to	reflect the impacts of the changed accounting data. The changes to the
25	accounting da	ta due to the true-up are being presented in the true-up direct testimony of Staff
26	witness Mark	Oligschlaeger.
27	Q.	Has Staff changed its rate design methodology?
28	А.	No.
29	Q.	Is there a Stipulation and Agreement concerning rate design in this
30	proceeding?	
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# True-up Direct Testimony of James A. Busch

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1	A. Yes. On September 13, 2006, Staff, the Office of the Public Counsel, Praxair,
2	and Explorer filed a Non-Unanimous Stipulation and Agreement Regarding Rate Design
3	Issues. Then, on September 20, 2006, The Empire District Electric Company filed notice that
4	it did not oppose the Non-Unanimous Stipulation and Agreement Regarding Rate Design.
5	Further, as of the date this testimony was prepared, no party has filed in opposition to the
6	Stipulation and Agreement or requested the Commission hold a hearing on it.
7	Q. How are Schedules DCR-1 (true-up) and DCR-3 (true-up) attached to your
8	true-up direct testimony different from Schedules DCR-1 and DCR-3 attached to the direct
9	testimony of Staff witness David C. Roos?
10	A. Paragraph 6 of the Stipulation and Agreement states, "[t]he Signatories hereby
11	agree that the methodology the Staff employed to determine rate revenues shown in Schedules
12	DCR-1 and DCR-3 attached to the Direct Testimony of Staff witness David C. Roos shall be
13	the methodology used to determine rate revenues for purposes of changing permanent rates;
14	however, the rate revenues shown on those schedules do not necessarily reflect trued-up rate
15	revenues." Schedules DCR-1 (true-up) and DCR-3 (true-up) attached to my true-up
16	testimony are Schedules DCR-1 and DCR-3 updated for trued-up rate revenues.
17	Q. How are Schedules DCR-2 (true-up) and DCR-4 (true-up) attached to your
18	true-up direct testimony different from Schedules DCR-2 and DCR-4 attached to the direct
19	testimony of Staff witness David C. Roos?
20	A. Schedules DCR-2 (true-up) and DCR-4 (true-up) are the trued-up version of
21	Schedules DCR-2 and DCR-4 that were attached to Staff witness David C. Roos' direct
22	testimony. These schedules show the rate values that would be assigned to each class

True-up Direct Testimony of James A. Busch

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assuming Staff's revenue requirement as filed in Mr. Oligschlaeger's true-up testimony was
 the final decision of the Commission.

Q. How is Schedule DCR-5 (true-up) attached to your true-up direct testimony
different from Schedule DCR-5 attached to the direct testimony of Staff witness David C.
5 Roos?

A. Schedule DCR-5 (true-up) is the trued-up version of Schedule DCR-5 that was
attached to Staff witness David C. Roos' direct testimony. This schedule compares the
monthly electrical bill that a typical residential customer would incur under current Empire
rates with the monthly bills generated by the Interim Energy Charge (IEC) continuation and
IEC termination scenarios as described in the Non-Unanimous Stipulation and Agreement.

Does this conclude your true-up testimony?

A. Yes.

Q.

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### THE EMPIRE DISTRICT ELECTRIC COMPANY -- CASE NO. ER-2006-0315 "TARGET" REVENUE TO BE COLLECTED BY NEW RATES

### **IEC CONTINUATION SCENARIO**

Change in Revenue Requirement: (\$15,258,967)

Sources of Rate Revenue	Current	Class Share of \$ from	"Target"	Revenue	Percent
MO Rate Schedule	Revenue	Permanent Rates	Revenue	Difference	Difference
RG- Residential	\$130,084,283	45.48%	\$123,144,477	(\$6,939,806)	-5.339
CB-Commercial	\$28,462,961	9.95%	\$26,944,504	(\$1,518,457)	-5.33%
SH-Small Heating	\$7,164,058	2.50%	\$6,781,866	(\$382,192)	-5.339
PFM- Feed Mill/ Grain Elev	\$56,694	0.02%	\$53,669	(\$3,025)	-5.339
MS- Traffic Signals	\$57,566	0.02%	\$54,495	(\$3,071)	-5.339
GP-General Power	\$53,964,067	18.87%	\$51,085,163	(\$2,878,904)	-5.33%
TEB- Total Electric Building	\$22,707,118	7.94%	\$21,495,727	(\$1,211,391)	-5.33%
LP- Large Power	\$36,306,020	12.69%	\$34,369,147	(\$1,936,873)	-5.33%
SC-Special Contract	\$2,452,230	0.86%	\$2,321,407	(\$130,823)	-5.33%
SPL- Municipal St. Lighting	\$1,242,402	0.43%	\$1,176,122	(\$66,280)	-5.33%
PL- Private Lighting	\$3,365,197	1.18%	\$3,185,669	(\$179,528)	-5.339
LS- Special Lighting	\$161,508	0.06%	\$152,892	(\$8,616)	-5.33%
Billed \$ from Permanent Rates	\$286,024,104	100.00%	\$270,765,137	(\$15,258,967)	
\$ from IEC Charge	\$8,809,651		\$8,809,651	\$0	0.00%
Other Rate Revenue					
CP-Cogeneration Purchase	(\$165)		(\$165)	\$0	0.00%
Excess Facilities Charges	\$1,741,643		\$1,741,643	\$0	0.00%
Interruptible Credits	(\$342,912)		(\$342,912)	\$0	0.00%
MO Other Rate Revenue	\$1,398,566		\$1,398,566	\$0	
Fotal Missouri Rate Revenue	\$296,232,321		\$280,973,354	(\$15,258,967)	

### THE EMPIRE DISTRICT ELECTRIC COMPANY - CASE NO. ER-2006-0315 ILLUSTRATIVE RATES FOR IEC CONTINUATION SCENARIO

### CLASS: RG - RESIDENTIAL

		Percent Change to	
	Current Rates	Current Rates	Final Rates[1]
Customer Charge	\$10.35	0.00%	\$10.35
Permanent Energy Charges:			
Summer	\$0.07770	-6.04%	\$0.07301
Winter			
First 600 kWh	\$0.07770	-6.04%	\$0.07301
Over 600 kWh	\$0.05220	-6.04%	\$0.04905
Interim Energy Charge	<b>\$</b> 0.00213	0.00%	\$0.00213

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[1] These rates, when applied to test year billing units, result in the "target" revenues shown on Schedule DCR-1 (True-Up).

### CLASS: CB - COMMERCIAL SERVICE

	Percent Change to					
	Current Rates	Current Rates	Final Rates[1]			
Customer Charge	\$14.60	0.00%	\$14.60			
Permanent Energy Charges:						
Summer	\$0.08670	-5.98%	\$0.08151			
Winter						
First 700 kWh	\$0.08670	-5.98%	\$0.08151			
Over 700 kWh	\$0.06530	-5.98%	\$0.06139			
Interim Energy Charge	\$0.00213	0.00%	\$0.00213			

[1] These rates, when applied to test year billing units, result in the "target" revenues shown on Schedule DCR-1 (True-Up).

### CLASS: SH - SMALL HEATING

	Percent Change to					
	Current Rates	Current Rates	Final Rates[1]			
Customer Charge	\$14.60	0.00%	\$14.60			
Permanent Energy Charges:						
Summer	\$0.08670	-5.75%	\$0.08172			
Winter						
First 700 kWh	\$0.08670	-5.75%	\$0.08172			
Over 700 kWh	\$0.05040	-5.75%	\$0.04750			
Interim Energy Charge	\$0.00213	0.00%	<b>\$0.00213</b>			

[1] These rates, when applied to test year billing units, result in the "target" revenues shown on Schedule DCR-1 (True-Up).

Schedule DCR-2-1(True-Up)

#### THE EMPIRE DISTRICT ELECTRIC COMPANY - CASE NO. ER-2006-0315 ILLUSTRATIVE RATES FOR IEC CONTINUATION SCENARIO

### CLASS: TEB - TOTAL ELECTRIC BUILDING

		Percent Change to	
	Current Rates	Current Rates	Final Rates[1]
Customer Charge	\$49.61		\$49.61
Demand Charge			
Summer	\$4.22	-5.38%	\$3.98
Winter	\$3.47	-5.38%	\$3.27
Permanent Energy Charges:			
Summer			
First 150HU	\$0.08140	-5.38%	\$0.07702
Next 200HU	\$0.05140	-5.38%	\$0.04864
All Add'l kWh	\$0.04630	-5.38%	\$0.04381
Winter			
First 150HU	\$0.04260	-5.38%	\$0.04031
Next 200HU	\$0.04010	-5.38%	\$0.03794
All Add'l kWh	\$0.03880	-5.38%	\$0.03671
Interim Energy Charge	\$0.00213	0.00%	\$0.00213

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[1] These rates, when applied to test year billing units, result in the "target" revenues shown on Schedule DCR-1 (True-Up).

#### CLASS: GP - GENERAL POWER

	Percent Change to					
	Current Rates	Current Rates	Final Rates[1]			
Customer Charge	\$49.61		\$49.61			
Demand Charge						
Summer	\$6.76	-4.04%	\$6.37			
Winter	\$5.28	-4.04%	\$4.98			
Primary Discount	(\$0.234)	-4.04%	(\$0.221)			
Permanent Energy Charges: Summer						
First 150HU	\$0.06950	-4.04%	\$0.06669			
Next 200HU	\$0.04380	-4.04%	\$0.04129			
Ali Add'i ƙWh Winter	\$0.03940	-4.04%	\$0.03714			
First 150HU	\$0.04080	-4.04%	\$0.03846			
Next 200HU	\$0.03940	-4.04%	\$0.03714			
All Add'I kWh	\$0.03840	-4.04%	\$0.03620			
Interim Energy Charge	<b>\$</b> 0. <b>002</b> 13	0.00%	\$0.00213			

[1] These rates, when applied to test year billing units, result in the "target" revenues shown on Schedule DCR-1 (True-Up).

### THE EMPIRE DISTRICT ELECTRIC COMPANY - CASE NO. ER-2006-0315 ILLUSTRATIVE RATES FOR IEC CONTINUATION SCENARIO

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#### CLASS: LP - LARGE POWER

	Percent Change to						
	Current Rates	Current Rates	Final Rates[1]				
Customer Charge	\$183.44	0.00%	\$183.44				
Demand Charge							
Summer	\$10.85	-5.35%	\$10.27				
Winter	\$5.98	-5.35%	\$5.66				
Secondary Adder	\$0.23	-5.35%	\$0.22				
Substation Facilities Credit	<b>(\$</b> 1.11)	-5.35%	(\$1.05)				
Permanent Energy Charges:							
Summer							
First 350HU	\$0.04310	-5.35%	\$0.04079				
All Add'i kWh	\$0.02230	-5.35%	\$0.02111				
Winter							
First 350HU	\$0.03800	-5.35%	\$0.03597				
All Add'l kWh	\$0.02150	-5.35%	\$0.02035				
Interim Energy Charge	\$0.00213	0.00%					

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[1] These rates, when applied to test year billing units, result in the "target" revenues shown on Schedule DCR-1 (True-Up).

### THE EMPIRE DISTRICT ELECTRIC COMPANY - CASE NO. ER-2008-0315 "TARGET" REVENUE TO BE COLLECTED BY NEW RATES

### IEC TERMINATION SCENARIO

Changes in Revenue Requirement:

\$15,929,828 Increase to Permanent Rates

(\$8,809,651) Decrease from Terminating IEC

Net Change: \$7,120,177

Sources of Rate Revenue	Current	IEC Revenue	Total	Class Share of	"Target"	Revenue	Percent
MO Rata Schedules	Revenue	by Class	Revenue	Total Revenue	Revenue	Difference	Difference
RG- Residential	\$130,084,283	3,572,643.33	\$133,656,926	45.33%	\$136,884,715	\$3,227,788	2.41%
CB-Commercial	\$28,462,961	699,404.84	\$29,162,366	9.89%	\$29,866,631	\$704,265	2.41%
SH-Small Heating	\$7,164,058	208.548.13	\$7,372,606	2.50%	\$7,550,653	\$178,047	2.41%
PFM- Feed Mill/ Grain Elev	\$56,694	1.024.09	\$57,718	0.02%	\$59,112	\$1,394	2.41%
MS- Traffic Signals	\$57,566	1,809.50	\$59,375	0.02%	\$60,809	\$1,434	2.41%
GP-General Power	\$53,964,067	1,824,082.65	\$55,788,150	18.92%	\$57,135,422	\$1,347,273	2.41%
TEB- Total Electric Building	\$22,707,118	757,374.18	\$23,464,492	7.96%	\$24,031,155	\$566,663	2.41%
LP- Large Power	\$36,306,020	1,545,344.02	\$37,851,364	12.84%	\$38,765,467	\$914,103	2.41%
SC-Special Contract	\$2,452,230	127,182.85	\$2,579,413	0.87%	\$2,641,705	\$62,292	2.41%
SPL- Municipal St. Lighting	\$1,242,402	34,799.95	\$1,277,202	0.43%	\$1,308,046	\$30,844	2.41%
	\$3,365,197	34,206.89	\$3,399,404	1.15%	\$3,481,499	\$82,095	2.41%
PL- Private Lighting	\$161,508	3,230,41	\$164,738	0.06%	\$168,717	\$3,978	2.41%
LS- Special Lighting Billed \$ from Permanent Rates	\$286,024,104	8,809,651	\$294,833,755	100.00%	\$301,953,932	\$7,120,177	
\$ from IEC Charge	\$8,809,651	(\$8,809,651)			\$0		-100.00%
Other Rate Revenue							
CP-Cogeneration Purchase	(\$165)		(\$165)		(\$165)	\$0	0.00%
Excess Facilities Charges	\$1,741,643		\$1,741,643		\$1,741,643	\$0	0.00%
Interruptible Credits	(\$342,912)		(\$342,912)		(\$342,912)	\$0 ]	0.00%
MO Other Rate Revenue	\$1,398,566		\$1,398,566		\$1,398,566	\$0	
Total Missouri Rate Revenue	\$296,232,321		\$296,232,321		\$303,352,498	\$7,120,177	

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### THE EMPIRE DISTRICT ELECTRIC COMPANY - CASE NO. ER-2006-0315 ILLUSTRATIVE RATES FOR IEC TERMINATION SCENARIO

### CLASS: RG - RESIDENTIAL

Customer Charge	Current Rates \$10.35	Effect to Rates of IEC Termination	Rates Equivalent to Current Rates [1] \$10.35	Percent Change to Equivalent Rates 0.00%	Final Rates [2] \$10.35
Permanent Energy Charges: Summer	<b>\$</b> 0.07770	\$0.00213	\$0.07983	2.72%	\$0.08200
Winter	•	·			
First 600 kWh	\$0.07770	\$0.00213	\$0.07983	2.72%	\$0.08200
Over 600 kWh	\$0.05220	\$0.00213	\$0.05433	2.72%	\$0.05581
Interim Energy Charge	\$0.00213	(\$0.00213)	\$0.00000		

[1] These rates collect the same revenues from the same customers as current rates.

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[2] These rates, when applied to test year billing units, result in the "target" revenues shown on Schedule DCR-3 (True-Up).

### CLASS: CB - COMMERCIAL SERVICE

Customer Charge	Current Rates \$14.60	Effect to Rates of IEC Termination	Rates Equivalent to Current Rates [1] \$14.60	Percent Change to Equivalent Rates 0.00%	Final Rates (2) \$14.60
Permanent Energy Charges: Summer	\$0.08670	\$0.00213	\$0.08883	2.70%	\$0.09123
Winter First 700 kWh Over 700 kWh	\$0.08670 \$0.06530	\$0.00213 \$0.00213	\$0.08883 \$0.06743	2.70% 2.70%	\$0.09123 \$0.06925
Interim Energy Charge	\$0.00213	(\$0.00213)	\$0.00000		

[1] These rates collect the same revenues from the same customers as current rates.

[2] These rates, when applied to test year billing units, result in the "target" revenues shown on Schedule DCR-3 (True-Up).

### CLASS: SH - SMALL HEATING

Customer Charge	Current Rates \$14.60	Effect to Rates of IEC Termination	Rates Equivalent to Current Rates [1] \$14.60	Percent Change to Equivalent Rates 0.00%	Final Rates [2] \$14.60
Permanent Energy Charges: Summer Winter	<b>\$0.08670</b>	\$0.00213	<b>\$</b> 0.08883	2.80%	\$0.09114
First 700 kWh Over 700 kWh	\$0.08670 \$0.05040	\$0.00213 \$0.00213	\$0.08883 \$0.05253	2.60% 2.60%	\$0.09114 \$0.05390
Interim Energy Charge	\$0.00213	(\$0.00213)	\$0.0000		

[1] These rates collect the same revenues from the same customers as current rates.

[2] These rates, when applied to test year billing units, result in the "target" revenues shown on Schedule DCR-3 (True-Up).

### THE EMPIRE DISTRICT ELECTRIC COMPANY - CASE NO. ER-2006-0315 ILLUSTRATIVE RATES FOR IEC TERMINATION SCENARIO

#### **CLASS: TEB - TOTAL ELECTRIC BUILDING**

Customer Charge	Current Rates \$49.61	Effect to Rates of IEC Termination	Rates Equivalent to Current Rates [1] \$49.61	Percent Change to Equivalent Rates 0.00%	Final Rates [2] \$49.61
-					
Demand Charge					
Summer	\$4.22	\$0.00	\$4.22	7.59%	\$4.54
Winter	\$3.47	\$0.00	\$3.47	7.59%	\$3.73
Permanent Energy Charges: Summer					
First 150HU	\$0.08140	\$0.00213	\$0.08353	7.59%	\$0.08987
Next 200HU	\$0.05140	\$0.00213	\$0.05353	7.59%	\$0.05759
All Add'i kWh Winter	\$0.04630	\$0.00213	\$0.04843	7.59%	\$0.05211
First 150HU	\$0.04260	\$0.00213	\$0.04473	7.59%	\$0.04813
Next 200HU	\$0.04010	\$0.00213	\$0.04223	7.59%	\$0.04544
All Add'l kWh	\$0.03880	\$0.00213	\$0.04093	7.59%	\$0.04404
Interim Energy Charge	\$0.00213	(\$0.00213)	\$0.00000		

[1] These rates collect the same revenues from the same customers as current rates.

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[2] These rates, when applied to test year billing units, result in the "target" revenues shown on Schedule DCR-3 (True-Up).

#### CLASS: GP - GENERAL POWER

Customer Charge	Current Rates \$49.61	Effect to Rates of IEC Termination \$0.00	Rates Equivalent to Current Rates [1] \$49.61	Percent Change to Equivalent Rates 0.00%	Final Rates [2] \$49.61
Demand Charge					
Summer	\$6.76	\$0.00	\$6.76	2.46%	\$6.93
Winter	\$5.28	\$0.00	\$5.28	2.46%	\$5.41
Primary Discount	(\$0.234)	\$0.00	(\$0.234)	2.46%	(\$0.23975)
Permanent Energy Charges: Summer					
First 150HU	\$0.06950	\$0.00213	\$0.07163	2.46%	\$0.07339
Next 200HU	\$0.04380	\$0.00213	\$0.04593	2.48%	\$0.04706
All Add'l kWh Winter	\$0.03940	\$0.00213	\$0.04153	2.46%	\$0.04255
First 150HU	\$0.04080	\$0.00213	\$0.04293	2.46%	\$0.04399
Next 200HU	\$0.03940	\$0.00213	\$0.04153	2.46%	\$0.04255
All Add'i kWh	\$0.03840	\$0.00213	<b>\$</b> 0.04053	2.46%	\$0.04153
Interim Energy Charge	\$0.00213	(\$0.00213	) \$0.00000		

[1] These rates collect the same revenues from the same customers as current rates.

[2] These rates, when applied to test year billing units, result in the "target" revenues shown on Schedule DCR-3 (True-Up).

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### THE EMPIRE DISTRICT ELECTRIC COMPANY - CASE NO. ER-2006-0315 ILLUSTRATIVE RATES FOR IEC TERMINATION SCENARIO

### CLASS: LP - LARGE POWER

Customer Charge	Current Rates \$183.44	Effect to Rates of IEC Termination 0	Rates Equivalent to Current Rates [1] \$183.44	Percent Change to Equivalent Rates	Final Rates [2]
Demand Charge					
Summer	\$10.85	\$0.00	\$10.85	2.40%	\$11.11
Winter	\$5.98	\$0.00	\$5.98	2.40%	\$6.12
Secondary Adder	\$0.023	\$0.00	\$0.02	2.40%	\$0.0236
Substation Facilities Credit	(\$1.11)	\$0.00	(\$1.11)	2.40%	(\$1.14)
Permanent Energy Charges: Summer					
First 350HU	\$0.04310	\$0.00213	\$0.04097	2.40%	\$0.0420
All Add'i kWh	\$0.02230	\$0.00312	\$0.01918	2.40%	\$0.0196
Winter					
First 350HU	\$0.03800	\$0.00213	\$0.03587	2.40%	\$0.0367
All Add'i kWh	\$0.02150	\$0.00213	\$0.01937	2.40%	\$0.0198
Interim Energy Charge	\$0.00213	(\$0.00213)	\$0.00426	2.40%	\$0.0044

[1] These rates collect the same revenues from the same customers as current rates.

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[2] These rates, when applied to test year billing units, result in the "target" revenues shown on Schedule DCR-3 (True-Up).

### THE EMPIRE DISTRICT ELECTRIC COMPANY - CASE NO. ER-2006-0315 AVERAGE MONTHLY BILLS FOR A TYPICAL<sup>1</sup> RESIDENTIAL CUSTOMER

### Ranked by Average Monthly Bill for 12 Consecutive Months of Service

Utility/ Scenario	Average Summer	Average Winter	12-Month Average	Rank
Empire/ Terminated IEC	\$92.35	\$67.92	\$76.06	Ť
Empire/ Current	\$90.18	\$66.40	\$74.33	2
Aquila MPS	\$91.15	\$65.72	\$74.19	3
Empire/ Continued IEC	\$85.49	\$63.11	\$70.57	4
KCPL	\$80.11	\$52.04	\$61.40	5
Aquila L&P	\$77.96	\$52.42	\$60.93	6
UĖ	\$79.75	\$47.90	\$58.52	7

### **Ranked by Average Summer Monthly Bill**

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Utility/ Scenario	Average Summer	Average Winter	12-Month Average	Rank
Empire/ Terminated IEC	\$92.35	\$67.92	\$76.06	1
Aquila MPS	\$91.15	\$65.72	\$74.19	2
Empire/ Current	\$90.18	\$66.40	\$74.33	3
Empire/ Continued IEC	\$85.49	\$63.11	\$70.57	4
KCPL	\$80.11	\$52.04	\$61.40	5
UE	\$79,75	\$47.90	\$58.52	6
Aquila L&P	\$77.96	\$52.42	\$60.93	7

### **Ranked by Average Winter Monthly Bill**

Utility/ Scenario	Average Summer	Average Winter	12-Month Average	Rank
Empire/ Terminated IEC	\$92.35	\$67.92	\$76.06	1
Empire/ Current	\$90.18	\$66.40	\$74.33	2
Aquila MPS	<b>\$91</b> .15	\$65.72	\$74.19	3
Empire/ Continued IEC	\$85.49	\$63.11	\$70.57	4
Aquita L&P	\$77.96	\$52.42	\$60.93	5
KCPL	\$80.11	\$52.04	\$61.40	6
UE	\$79.75	\$47.90	\$58.52	7

1. A "typical" residential customer is defined as a customer in the residential general class that uses 1000 kWh per month during four Summer months and 750kWh during eight Winter months.