BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Establishment of a Collaborative Working Case Dedicated to Reviewing the Consolidation of Jurisdictions of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West	))))))	File No. EW-2025-0220

<u>WORKSHOP SUMMARY</u>

COMES NOW, Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri Metro") and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West") (collectively, "Evergy" or the "Company") and submits its *Workshop Summary* ("Summary") to the Missouri Public Service Commission ("Commission"), and states as follows:

1. As described in paragraph 8 of the *Stipulation & Agreement* filed on October 2, 2024 ("Stipulation & Agreement") and approved in Docket No. EW-2024-0189, the Company agrees to participate in, within this docket, at least three workshops that will occur once each quarter starting the second quarter of 2025.

2. Following an on-the-record presentation to Commissioners on May 20, 2025, to present what Evergy considers the most important consolidation issues that need to be addressed, the Company held its first workshop with signatories to the Stipulation & Agreement on June 6, 2025. As part of the Stipulation & Agreement, after each workshop the Company is to file a report that summarizes the workshop and answers outstanding questions from the workshop.

3. The purpose of this first workshop was to present what Evergy considers to be the most important consolidation issues, potential benefits, potential challenges to be considered and addressed, answer questions, and discuss those items while soliciting feedback from stakeholders

on their perspectives. A copy of the presentation discussed at Workshop 1 is attached hereto as Attachment 1.

4. The Office of Public Counsel ("OPC") provided some questions in advance of the workshop that were related to the on-the-record presentation and the Company discussed these questions and answers with the stakeholders during the meeting.

Discussion Points

5. In addition, stakeholders raised various questions for consideration to be addressed through the process, such as:

- Are there any similar examples of other utilities like Evergy Missouri Metro that have pursued consolidation/split activities?
- How is the Company thinking about joint generation ownership? Splitting assets at Evergy Missouri Metro will be a significant issue to address, as well as how to design the Integrated Resource Plan ("IRP") and generation decisions on a go-forward basis, such as potentially taking future Evergy Missouri Metro generation assets and hard code ownership shares between Kansas and Missouri like joint ownership agreements.
- A potential benefit for legal entity consolidation may be that a consolidated utility would be better situated to absorb rate impacts from significant events like Winter Storm Uri.
- To the extent that future mergers and acquisitions may present itself, the Company may be better positioned for those opportunities if it completes a legal entity consolidation.

- Discussed how the Company has been able to achieve many of the cost efficiencies and benefits of consolidation without consolidating (such as shared resources like accounting, regulatory, Evergy Services, etc.).
- The forecasted data center load coming on may be game changers in how they may influence load factors at Evergy Missouri West.
- Stakeholders discussed Evergy's plan to address rate structure alignment first before addressing individual customer bill impacts. For consolidation, it gets harder to accomplish if structures are not aligned first.
- Rate impact analysis will be an important consideration in rate jurisdiction consolidation work, and the Company and stakeholders need to determine what to address and when in the process for efficient use of resources.
- Discussion around some of the biggest differences between Evergy Missouri Metro and Evergy Missouri West rate structures.
- Discussion around addressing consolidation issues in rate cases as opposed to separate rate design cases, with the Company sharing its perspective that separate rate design proceedings would be more difficult given construction of plants driving timing of cases, and there will be more of an impact to changing rate structures and consolidation due to major construction projects coming online. As a result, we need to be careful regarding impacts when doing both (can't necessarily get the revenue neutral given construction projects coming online).
- It will be important to approach consolidation in bite sized steps and stages so stakeholders can keep the work and potential impacts manageable and not overwhelming.

Follow-up Items

6. In terms of follow-up, stakeholders requested that, with regards to potential legal entity consolidation approaches being considered, the Company add an additional approach “Path of least resistance B option” (this would create one legal entity in Missouri and two legal entities in Kansas (Splits Evergy Metro and consolidates except for Evergy Kansas Central and Evergy Kansas South).

7. Stakeholders also asked the Company to consider adding to the list whether there needs to be any statutory changes that help us with consolidation (such as helping mitigate the potential tax impacts).

8. In addition, the Company should also evaluate if there may be any impacts to the Decommissioning Trust Fund for Wolf Creek if it splits legal entities.

Next Steps

9. The Company asked for stakeholders to send any additional feedback they may have at this time on information presented to date in the next two weeks so it can be incorporated as appropriate into Workshop 2.

10. The Company shared the Workshop 1 presentation with stakeholders. Following the meeting, the Company also provided supporting background information related to the on-the-record presentation’s estimated make whole payments chart (slide 22).

11. Stakeholders agreed that late August or early September would be a target for scheduling Workshop 2. Workshop 2 has now been scheduled for September 8, 2025, at 1:00 p.m. in the Commission’s Jefferson City offices.

WHEREFORE, The Company submits this Summary and attached presentation to the Commission.

Respectfully submitted,

/s/ Roger W. Steiner

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ATTORNEYS FOR EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was emailed on this 2nd day of September 2025 to counsel for all parties.

/s/ Roger W. Steiner

Roger W. Steiner

EW-2025-0220

Jurisdictional Consolidation Workshop #1

June 6, 2025

Workshop # 1 Discussion Focus

- For this early stage of the process,
  - ➢ Evergy does not have a recommendation which presumes or predetermines an outcome related to legal entity consolidation or rate jurisdiction consolidation
  - ➢ We are focused on issue identification: determine what needs to be addressed as part of the consolidation evaluation and roadmap work, which includes identifying differences between jurisdictions, potential benefits, and potential challenges associated with consolidation
  - ➢ We are not trying to suggest answers today but create a range of questions to answer
  - ➢ This will help determine specific areas that need to be evaluated and analyzed to inform a recommendation

- Focus for today is for Evergy to listen to the parties and capture their issues to address and get feedback from Stakeholders regarding the On the Record Presentation
  - ➢ Recap and discuss the key issues, potential benefits and potential challenges identified to date by Evergy to be addressed and evaluated for jurisdictional consolidation
  - ➢ Address stakeholder questions
  - ➢ Specifically, what have we missed in what was presented and what are things you want to see addressed as part of the evaluation?
  - ➢ We can address some of the questions during the workshop but in many cases we may not have answers at this time because that work and analysis on these identified issues is yet to be done
  - ➢ This feedback will be incorporated into what Evergy presents at Workshop #2 regarding Evergy's proposed roadmap to evaluate these issues and establish a recommendation on Consolidation

Goals & Objectives for Jurisdictional Consolidation

Approaches to Jurisdictional Consolidation

Legal Entity Consolidation: Merging of corporate units within a holding company structure

- *Consolidation of operating companies*

Rate Jurisdiction Consolidation: Refers to consolidation of rates and revenue requirements across jurisdictions, composed of three steps:

- *Step 1: Rate Structure Consolidation: refers to the consolidation of line items on a customer's bill (i.e., the line items across consolidated jurisdictions will be identical and measured the same way). While line items on customers' bills align, actual prices customers pay may continue to be different*

- *Step 2: Revenue Requirement Consolidation: combined revenue requirement as a common target to establish consolidated rates, requiring separate and combined cost of service studies*

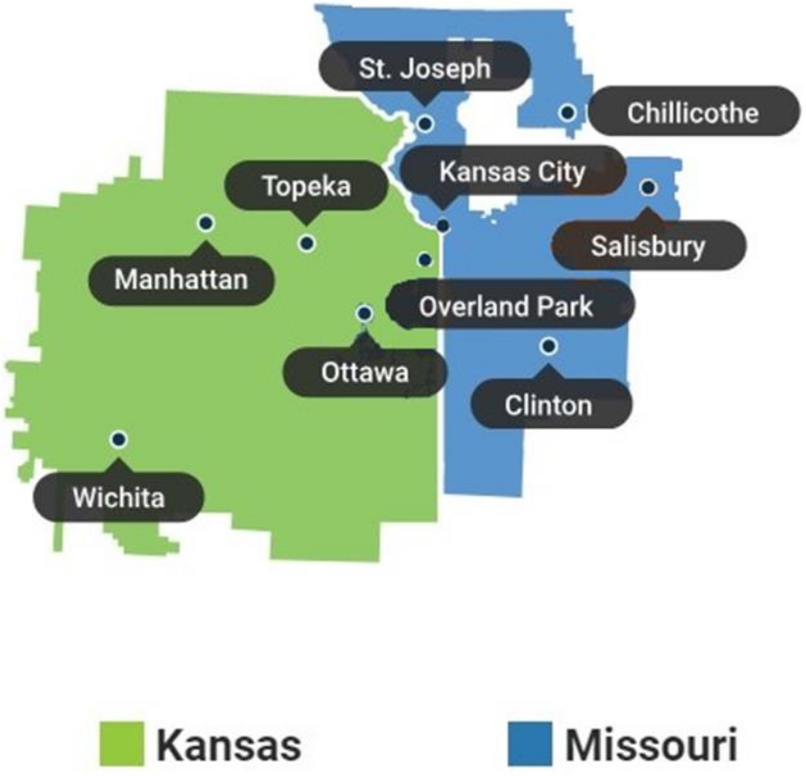
- *Step 3: Price Consolidation: of rate jurisdiction consolidation refers to the actual rate that customers pay being aligned across jurisdictions.*

Legal entity and rate consolidation both have unique benefits and challenges

Legal Entity Consolidation Evaluation Objectives

- Evaluate consolidation of legal entity structures including different end states
  - Examples: consolidating Evergy Missouri West and Evergy Metro; consolidating Evergy Kansas Central and Evergy Kansas South; splitting Evergy Metro across state lines
- Develop the business case for legal consolidation
- Identify challenges to legal consolidation, as well as mitigating factors or offramps
- Catalogue the necessary steps and activities to achieve consolidation, including decision points and timelines

Potential Legal Entity Consolidation End State

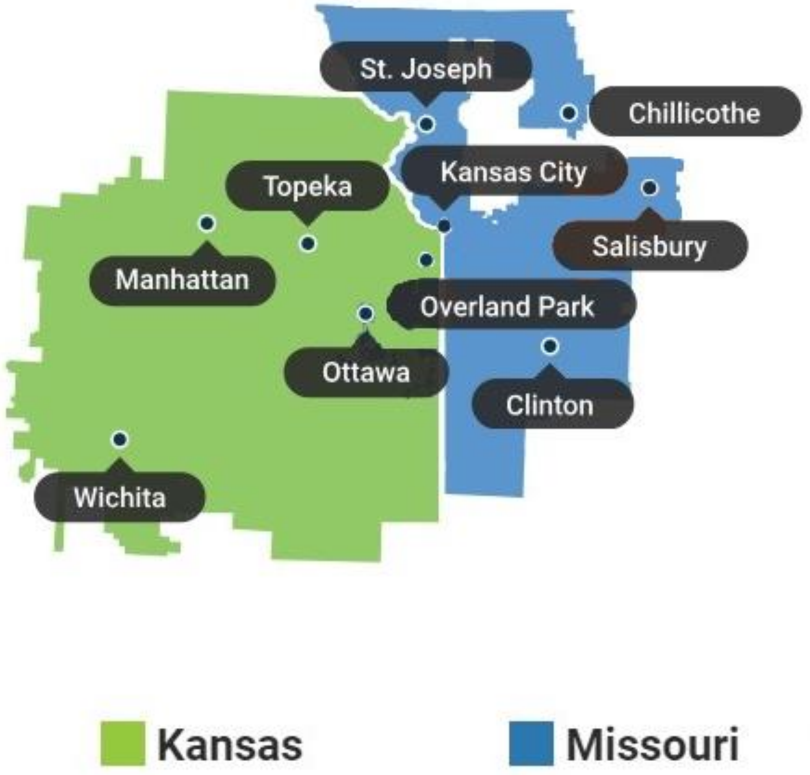


Work should be staged and divided into manageable increments with milestones to adequately assess impacts

Rate Consolidation Evaluation Objectives

- Evaluate consolidation of rates within each state and where possible align rate structures across states.
- Understand the gap between today's rates and consolidated rates and then establish a reasoned approach to achieve consolidation.
- Identify potential barriers and mitigation strategies as well as off-ramps to rate consolidation.
- Catalogue the necessary steps and activities to achieve consolidation, including decision points and timelines

Potential Rate Consolidation End State



The premise of rate consolidation is that the character of service provided across service areas is fundamentally the same and any snapshot of cost-of-service differences are temporary and driven by timing of investments for one service area compared to the next.

Potential Benefits from Jurisdictional Consolidation

Legal Entity Consolidation

Rate Consolidation

Jurisdictional Consolidation Potential Benefits

Key Benefit / Cost Saving	Legal Entity Consolidation	Rate Jurisdiction Consolidation
Regulatory Simplification (including more predictable regulatory outcomes)	❯	❯
Simplified Corporate Structure	❯	
Reduced Mortgages and Streamlined Borrowing	❯	
Expanded Bondable Capacity	❯	
Reduced Coal Heavy Utility Financing Risk	❯	
Efficient System and Resource Planning	❯	❯
Operating Efficiencies (including purchasing economies of scale, and reduced audit costs)	❯	
Streamlined Rate Structure and Reporting		❯
Improved Customer Experience		❯
Simplified Billing		❯
Improve Affordability by Sharing Costs Across a Broader Set of Customers		❯
Mitigates Challenges of State Policy Differences		❯

While both consolidation paths provide regulatory simplification and more efficient system and resource planning benefits, they have varying benefits

Legal Entity Consolidation Potential Benefits

Potential Benefit	Description
Regulatory Simplification	Aligns with/might advance consolidation of rates, which would help streamline regulatory and customer operations, including addressing different methodologies and reducing the number of allocations
Simplified Corporate Structure	Simplifies legal structure including tax filings, FERC Form-1s, audits, and avoid some double taxation when inventory is transferred between affiliate companies.
Reduced Mortgages and Streamlined Borrowing	Reduces number of outstanding mortgages/indentures and can streamlines the borrowing process. This can create a stronger financial position and stronger credit ratings (two larger entities instead of four smaller entities)
Expanded Bondable Capacity	Evergy Kansas Central's bondable capacity is limited, and consolidation would potentially unlocks sharing of KS South bondable capacity.
Reduced Coal Heavy Utility Financing Risk	Addresses these co-ownership issues (i.e., different net asset values for the same assets under co-ownership; different depreciation rates in each jurisdiction for the same asset)
Efficient System and Resource Planning	Enables Evergy to perform its integrated resource planning on a statewide basis, rather than OpCo by OpCo. Commission approval of generation assets will no longer require approval from two jurisdictions.
Operating Efficiencies	Legal consolidation can often include things like purchasing economies of scale, and reduced audit costs). It also allows costs to be shared across a broader customer group in each state. Given synergy savings from prior merger many operational synergies may not be material

Legal Entity Consolidation benefits include efficiency for regulatory, customer, and operations processes

Rate Jurisdictional Consolidation Potential Benefits

Potential Benefit	Description
Regulatory Simplification	Simplified rate structures and a consolidated revenue requirement simplifies reviews and the number of issues. It also reduces reporting volume and complexity.
Efficient System and Resource Planning	As business practices are simplified, utilities can redirect resources to support other customer needs. Utilities also have greater flexibility on where investments can be made without increased concern of bill impacts for smaller customer groups.
Streamlined Rate Structure and Reporting	Clean-up of historical rate options to streamline the portfolio of rates and underlying business processes as well as and drive out remaining class subsidy from the rate structures. Consistent pricing structures/incentives throughout the Evergy footprint.
Improved Customer Experience	Promotes universal service for customers. Customers in neighboring areas will have the same rates for the same service, thus reducing customer confusion, especially in metro media markets covering multiple jurisdictions. It also helps overcome barriers to system expansion or investment that could otherwise inhibit customer access.
Simplified Billing	As business practices are simplified, utilities can redirect resources to support other customer needs. Simplified billing management and underlying business processes. Utility billing systems, billing management, auditing, and addressing customer questions is simplified.
Improve Affordability	Costs are spread across a larger customer base thus averaging out investments across the full system over time. The ability to spread costs across a larger group of customers significantly improves the ability to make investments at more affordable rates.
Mitigates Challenges of State Policy Differences	Cases for different rate jurisdictions even within the same state do not always have similar outcomes, sometimes due to timing or different stakeholders involved

Jurisdictional rate consolidation can potentially provide long-term customer benefits

Potential Challenges to Achieving Jurisdictional Consolidation

Potential Challenges to Achieving Jurisdictional Consolidation

❯ Legal Entity Consolidation
❯ Rate Consolidation

Key Challenge	Legal Entity Consolidation	Rate Jurisdiction Consolidation
Complexity of Splitting Evergy Metro	❯	❯
Customer Pushback on Legacy Investment Sharing	❯	
Debt Restructuring	❯	
Property Tax Shifts	❯	
Risk of Creating an Invalid End State	❯	
Risk of “Half Measures” Where Further Consolidation Activities are Needed to Achieve Benefits	❯	
MPSC and KCC Merger Standard Alignment (or Misalignment)	❯	
Existing Rate Differentials Between Service Areas in Each State		❯
Cost of Service Differences		❯
Metro Cost Allocation/Legal Consolidation Between States		❯
Customer Bill Impacts of Rate Consolidation		❯
Stakeholder/Commission Opposition	❯	❯

Challenges vary based on consolidation paths, but both will have complexity surrounding splitting Evergy Metro

Key Challenges to Legal Entity Consolidation

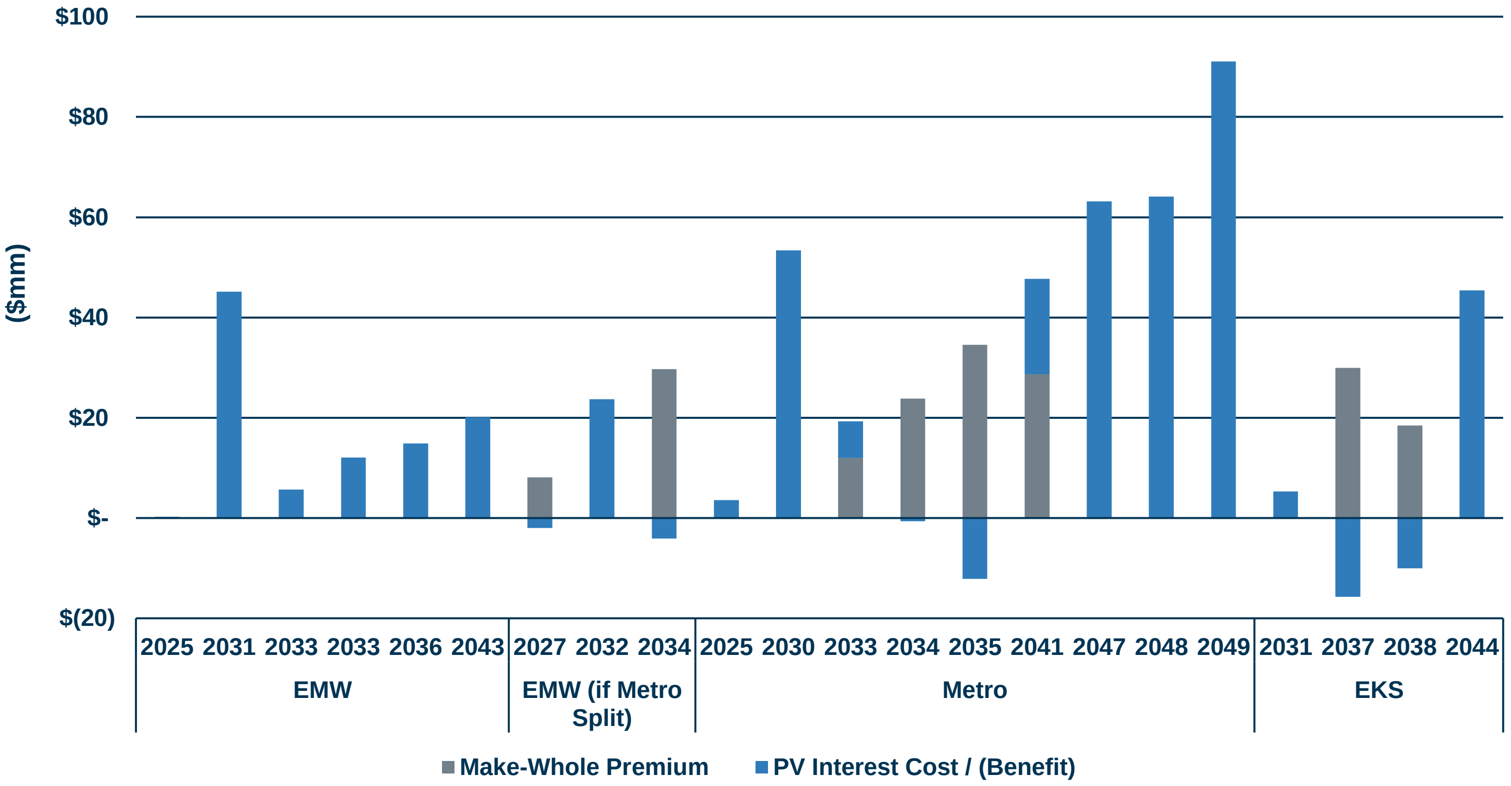
Challenge	Description
Splitting Evergy Metro	If Evergy Metro is split, there will be significant challenges and administrative burdens involved with splitting assets between jurisdictions and bond indentures. This will be especially challenging as it relates to transmission and generating assets that serve customers in both Missouri and Kansas. In addition, a split Evergy Metro by itself does not bring the benefits of legal entity consolidation unless it is coincident with the consolidation of Evergy Metro MO and Evergy MO West, and Evergy Metro KS and EKC.
Customer pushback on legacy investment sharing	Current revenue requirements for each OpCo reflect legacy investments by customers. Allocation of assets to newly consolidated OpCos will be a challenging endeavor and will likely draw significant regulatory scrutiny.
Debt restructuring	Evergy's OpCos each have their own mortgage indentures and outstanding debt. Changes of control may trigger debt restructuring activities such as gaining bondholder consent, paying "make whole" payments, or refinancing of outstanding securities. Each of these activities has an associated cost.
Shifts of property tax burdens	• The consolidation of MO OpCos could lead to a potential shift in property tax burdens between counties due to the way property taxes are assessed (i.e., by pole miles). • There are also potential shifts in property taxes to Kansas South counties away from Kansas Central counties due to the way property taxes are assessed in KS (i.e., by earnings, and with Wolf Creek being in Kansas South).
"Half measures"	Certain contemplated consolidation interim states and end states represent "half measures" that will not unlock the full suite of potential consolidation benefits.
Creating an invalid end state	The splitting of Evergy Metro alone without taking further consolidation steps creates an end state that is not valid because the costs would outweigh potential benefits.
MoPSC and KCC Merger Standard Alignment (or Misalignment)	The Missouri Commission applies a "not detrimental to the public interest" standard. The Kansas Commission applies a standard that a merger will "promote the public interest,"
Stakeholder / commission opposition	Stakeholders and/or state regulatory commissions may oppose reorganization.

Challenges vary but are mainly financial focused

Make-Whole Payments and Refinancing Costs Must Be Addressed with Legal Entity Consolidation

- Evaluates covenants and change of control terms within Evergy's indentures, debt restructuring costs, and need for any bondholder consent for any changes to Evergy's indentures.
- Absent gaining bondholder consent to modify indentures (if required), the cost of make-whole payments and refinancing costs are significant (i.e., approx. $185 million in make-whole payments and approx. $430 million in refinancing costs) and potentially prohibitive.
- Analysis as of October 2024 and can change materially as interest rates change
- The potential costs highlight the need to approach debt restructuring strategically and to have financing related off-ramps.
- *Note: Negative PV of interest rate costs indicate that estimated refinancing interest rates are below current rates on existing bonds.*

Make-Whole Premiums and PV of Interest Cost / (Benefit)
By Operating Company and Maturity Date



Note: Chart does not include debt issuance costs. Analysis as of October 2024

Unmitigated, make-whole payments and refinancing costs create a significant challenge to accomplishing legal consolidation

Key Challenges to Rate Jurisdictional Consolidation

Challenge	Description
Splitting Evergy Metro	Splitting Metro for legal consolidation may have impacts on how costs are allocated to Missouri customers compared to current cost allocations.
Existing Rate Differentials Between Service Areas in Each State	The remaining steps for rate structure and rate alignment have greater chance of customer impacts and disruption. Left unmitigated, meaningful rate and rate structure changes may result in unpredictable customer outcomes
Cost of Service Differences	Temporary service costs may vary between different entities (urban vs. rural; legacy decisions). Tariff consolidation will require considerable process change and alignment within Evergy's Corporate processes.
Metro Cost Allocation/ Legal Consolidation Between States	Agreement between KS and MO commissions on Metro asset allocations is a critical requirement. Splitting Metro would require a cost allocation study to split assets between Kansas and Missouri. Such a study could result in changes to the allocation ratios to each jurisdiction, may indicate that infrastructure upgrades are needed, and may pose additional challenges.
Customer Bill Impacts of Rate Consolidation	Need robust tools to model customer impacts of consolidation proposals. Rate design bill impacts are incremental to rate increase requests and therefore limit the speed of rate consolidation.
Stakeholder / commission opposition	Rate consolidation delays may increase complexity for bill impacts and future regulatory goals.

Overcoming these challenges require collaborative problem solving and a long-term commitment

What Makes Rate Consolidation So Difficult?

- When aligning rate structures and prices, some customers will see bill decreases while others will see bill increases.
  - Unmitigated, these impacts can be significant and challenging to explain to individual customers.
  - Bill impacts to small groups of customers can stall rate consolidation efforts.
  - Additional customer communication and customer service support may be necessary about what is changing and why.
- Billing system capabilities may need to be enhanced to accommodate new billing practices or bill impact mitigation approaches.
  - Investments in the billing system may be time consuming and expensive.
- Successful consolidation requires commitment from the utility and Commission and can take many years to achieve, depending on mitigation efforts related to differences in rate structures and pricing.

Messaging and phasing are key to successful consolidation

Next Steps

Overview of Commission Order and Purpose of EW-2025-0220 Docket

Pre-Workshops

Requirements:

- Evergy to open non-contested docket to review consolidation of Evergy Missouri Metro and EMW
- Docket to include at least 3 quarterly stakeholder workshops (starting Q2 2025)
- On the Record Presentation to Commission prior to first workshop

On the Record Presentation:

- Present most important consolidation issues that need to be addressed and to solicit initial input from the Commission and interested stakeholders

Workshop #1

Requirements:

- Q2 2025
- Company will identify deliverables and provide consolidation milestones and estimated timeframes
- Post-workshop Company report filing summarizing workshop and answers questions left outstanding during workshop

Workshop Focus:

- Evergy to present consolidation issues, benefits, and challenges to stakeholders for discussion and feedback
- Highlight reorganization/ consolidation roadmap guiding principles on stakeholder impacts

Workshop #2

Requirements:

- Q3 2025
- Company will identify deliverables and provide consolidation milestones and estimated timeframes
- Post-workshop Company report filing summarizing workshop and answers questions left outstanding during workshop

Workshop Focus:

- Incorporates stakeholder feedback from Workshop #1
- Present initial thoughts on consolidation roadmap
- Solicit stakeholder feedback

Workshop #3

Requirements:

- Q4 2025
- Company will identify deliverables and provide consolidation milestones and estimated timeframes
- Post-workshop Company report filing summarizing workshop and answers questions left outstanding during workshop

Workshop Focus:

- Incorporates stakeholder feedback from Workshop #2
- Present modified/ reorganization consolidation roadmap, after incorporating stakeholder feedback

Post-Workshops

Requirements:

- On the Record Presentation to Commissioners within 3 months of final workshop to present all identified potential consolidation options
- Final report details all the information provided in the final on the record presentation along with all supporting information, including necessary workpapers

Appendix

Legal Entity Consolidation Approaches

"1 Per State"	"Grow Metro"	"Split Metro"	"Kansas Only 1"	"Kansas Only 2"	"Path of Least Resistance"
Two operating companies operating in two states (i.e., Missouri and Kansas), which means one OpCo in Missouri and one OpCo in Kansas	Consolidate Evergy Missouri West into Evergy Metro	Split Evergy Metro along the state border	Consolidate Evergy Kansas South into Evergy Kansas Central	Consolidate Evergy Metro into Evergy Kansas Central (after "Split Metro" is performed)	"Grow Metro" + "Kansas Only 1" (avoids splitting metro)

Legal Entity Consolidation Could Take Different Forms

Post-Consolidation Debt Financing – A Preliminary View for a Stage-Gated Approach

A "stage-gated" approach to Evergy's financial plan allows for incremental steps to be taken to evaluate options, with opportunities for off-ramps at each stage gate/decision point, as well as evaluation of incremental costs at each Stage Gate.

Stage Gate 1: Preliminary Evaluation (Roadmap)	Stage Gate 2: Detailed Evaluation	Stage Gate 3: Develop Financial Plan	Stage Gate 4: Bondholder Consent (if required)
• Internal review of outstanding debt documents to ensure no covenant restrictions on corporate restructuring options. • Quantify maximum cost assuming no bondholder consent (e.g., make-whole payments, refinancing costs, etc.). • Engage law firm to conduct due diligence review of all debt documents and leases to ensure there are no gating items to the preferred structure. • Engage investment bank (either prior to Stage Gate 1 or 2). • Identify potential pathways to financing new corporate structure, debt restructuring, and indenture revisions. Decide on a preferred structure. • Determine merger structure for Kansas utility (assumes that in Kansas, EKS merged into EKC) and Missouri utility (assumes that in Missouri, EMW merges into EM). • Prepare list of property to be released under each applicable mortgage (and determine applicability of release provisions under the mortgage). • Quantify the "Fair Value" (or equivalent, as defined in the mortgages) of the "Mortgaged Property" (or equivalent, as defined in the mortgages) proposed to be split and/or released from existing mortgages. • Review of local county requirements for recording release of property from lien of the mortgage, as applicable.	• Obtain expert opinions on financing pathways and bondholder rights. • Obtain expert opinions on tax strategies and tax impacts of asset transfers. • Develop bondholder consent strategy (if required). • Engage investment bank on bondholder consent strategy (if required) and market receptivity on various financing options (here or in first stage or both). • Determine at each stage when regulatory approval is required as part of strategy analysis (e.g., WCNOC), FERC, NERC, state regulators.	• Develop detailed plan of allocation and transfer of assets to new OpCos. • Engage regulators* • Develop bondholder consent documents and filings (if required). • Draft new indentures and revisions to existing indentures (if needed). • Engage credit ratings agencies.	• Engage with bondholders, including to determine re-financing costs • Perform bondholder consent solicitation (if required). • Proceed with debt restructuring
Decision 1: Retain External Advisors	Decision 2: Proceed with Detailed Evaluation	Decision 3: Proceed with Detailed Financial Plan (this decision point includes reaching a determination on whether bondholder consent is required)	Decision 4: Perform Bondholder Solicitation (if required)

* "Engage regulators" includes an internal analysis of the impact of consolidation on Evergy's financing authority and what, if any, regulatory filings will be required for new financings.

Rate Similarities & Differences

2024 Actuals (Not Weather Normalized)

**Does not contain riders, DSIM or Economic Development Riders. EMM and EMW data is actual data, not weather normalized data*

Rate Class	MO West KWh	MO Metro kWh	MO West $$	MO Metro $$
Residential	3,546,298,617.75	2,813,951,995.03	399,357,242.40	372,259,974.77
Small General Service	1,398,418,543.58	723,521,087.54	138,056,435.00	91,808,303.82
Medium General Service	N/A	1,252,721,770.55	N/A	136,670,016.96
Large General Service	1,247,145,017.87	2,202,485,868.33	95,687,699.37	200,145,894.94
Large Power Service	1,975,410,539.80	1,570,482,268.95	121,250,889.34	128,954,785.98

Rate Class	MO West $$	MO Metro $$	Diff $$	EMM to EMW Diff %	EMW to EMM Diff %
Residential	$ 0.11261	$ 0.13229	$ 0.01968	14.88%	-17.47%
Small General Service	$ 0.09872	$ 0.12689	$ 0.02817	12.69%	-28.53%
Medium General Service	-	$ 0.10910	$ 0.10910	0.00%	0.00%
Large General Service	$ 0.07673	$0.09087	$0.01417	15.57%	-18.44%
Large Power Service	$ 0.06138	$0.08211	$0.01622	25.25%	-33.78%

In 2012 the rate class differences between MOPUB and SJLP were in the +/- 4-5% range

Rate Consolidation Common Steps - Missouri

Residential

General Description of *End-State Rate Structure* for Rate Consolidation Purposes:

1) Maintain existing TOU alternatives rate structures

Gap from Current Rate Structure to End-State:
Minimal

- Adoption of default TOU in MO transitioned most customers onto a consistent rate structure.

Critical Remaining Steps:

- Tariff clean-up proposals
- Elimination of frozen rate options
- Price Consolidation

Commercial and Industrial

General Description of *End-State Rate Structure* for Rate Consolidation Purposes:

1) Bright Lines for Small, Medium, Large service classes
2) Four part rate structure: customer charge, facilities charge, demand charge, and energy charge.
3) Voltage-differentiated rates, where applicable

Gap from Current Rate Structure to End-State:
Significant

- Several structural changes are needed in both MO Metro and MO West

Critical Remaining Steps:

- 15-Minute demands for MO Metro
- Implement Bright Lines, transition away from Hours Use, eliminate Annual Base Demand (West only)
- Price Consolidation

Lighting

General Description of *End-State Rate Structure* for Rate Consolidation Purposes:

1) LED rates and aligned LED fixture definitions.

Gap from Current Rate Structure to End-State:
Moderate

- LED lighting is the status quo, legacy lighting types have been frozen.
- Lighting clean-up and consolidation tends to take time to allow obsolete equipment to transition to LED.
- Legacy pricing differentials may be significant between service areas and legacy services.

Critical Remaining Steps:

- Tariff clean-up towards common structure and billing units
- Freeze and eventually eliminate Traffic Signal service (Decision Point)
- Natural attrition of legacy lights to be replaced with LEDs
- Price Consolidation

Note: Residential and C&I EV and Battery rate programs are structured the same for each rate consolidation and will evolve based on market conditions and experience.

Potential Rate Structure Alignment Issues

MO West	Replace Hours Use Structure
	ABD Clean-up & Removal
	Continued Facilities Charge cost alignment
	Propose optional C&I rate (time based) and propose elimination of Time Related Pricing
	Implement Bright Lines (Evaluate/Determine the need for MGS class)
	EMW has RESRAM and Securitization Charge while EMM does not
MO Metro	Replace 30-min with 15-min demand intervals
	Replace Hours Use Structure
	Facilities Charge Cost Alignment
	Implement Bright Lines
	Propose optional C&I rate (time based) and propose elimination of Time Related Pricing
	Eliminate Residential Time of Day Rate
	Simplify C&I customer charge (remove block)

Most of the significant Rate Structure issues to address are in the C&I rates