

Exhibit No.:  
Issue: Weather Normalization; Customer  
Annualization of Unit Sales  
Witness: Albert R. Bass, Jr.  
Type of Exhibit: Direct Testimony  
Sponsoring Party: Kansas City Power & Light Company  
Case No.: ER-2016-0285  
Date Testimony Prepared: July 1, 2016

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Missouri Public  
Service Commission

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO.: ER-2016-0285**

**DIRECT TESTIMONY**

**OF**

**ALBERT R. BASS, JR.**

**ON BEHALF OF**

**KANSAS CITY POWER & LIGHT COMPANY**

Kansas City, Missouri  
July 2016

XCP Exhibit No. 100  
Date 2/28/17 Reporter XF  
File No. ER-2016-0285

**DIRECT TESTIMONY**

**OF**

**ALBERT R. BASS, JR.**

**Case No. ER-2016-0285**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

15 A: The purposes of my testimony are to:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

10 A: The calculation of the energy efficiency adjustment is based on the stipulation in Case  
11 No. EO-2015-0240<sup>1</sup>:

12 In the first step, KCP&L will take test period weather normalized kWh usage for  
13 each customer class by billing month and adjust it by<sup>2</sup> adding back the monthly kWh  
14 energy savings by customer class incurred during the test period from all active Missouri  
15 Energy Efficiency Investment Act (“MEEIA”) programs, excluding Home Energy  
16 Reports and Income-Eligible Home Energy Reports programs which have a one year  
17 measure life, determined using the same methodology as described in Tariff Sheet 49  
18 through 49P (KCP&L) except that calendar month load shape percentages by program by  
19 month will be converted to reflect billing month load shape percentages by program,

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

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

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



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

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

13 In the third step, the test period kW demand for each customer class will be  
14 adjusted by<sup>3</sup> adding back the monthly kW demand savings by customer class incurred  
15 during the test period from all active MEEIA programs, excluding Home Energy Reports,  
16 Income-Eligible Home Energy Reports and Demand Response Incentive programs,  
17 determined using the same methodology as described for kWh savings in Tariff Sheet 49  
18 through 49P (KCP&L) and then subtracting the cumulative annual kW demand savings  
19 from the first month of the test period through the month ending where actual results are  
20 available (most likely two months prior to the true-up date) by customer class from all

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

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

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

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

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

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

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

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

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

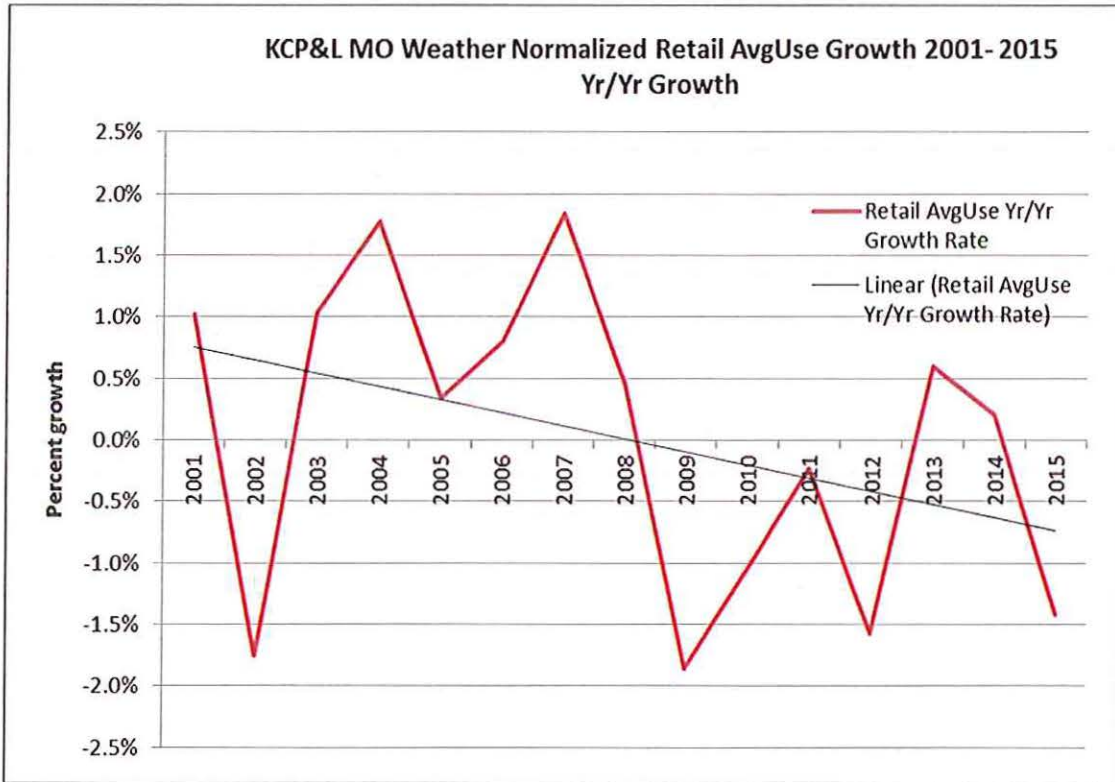
1                   **II.     DECLINE IN AVERAGE PER-CUSTOMER USAGE**

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

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

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

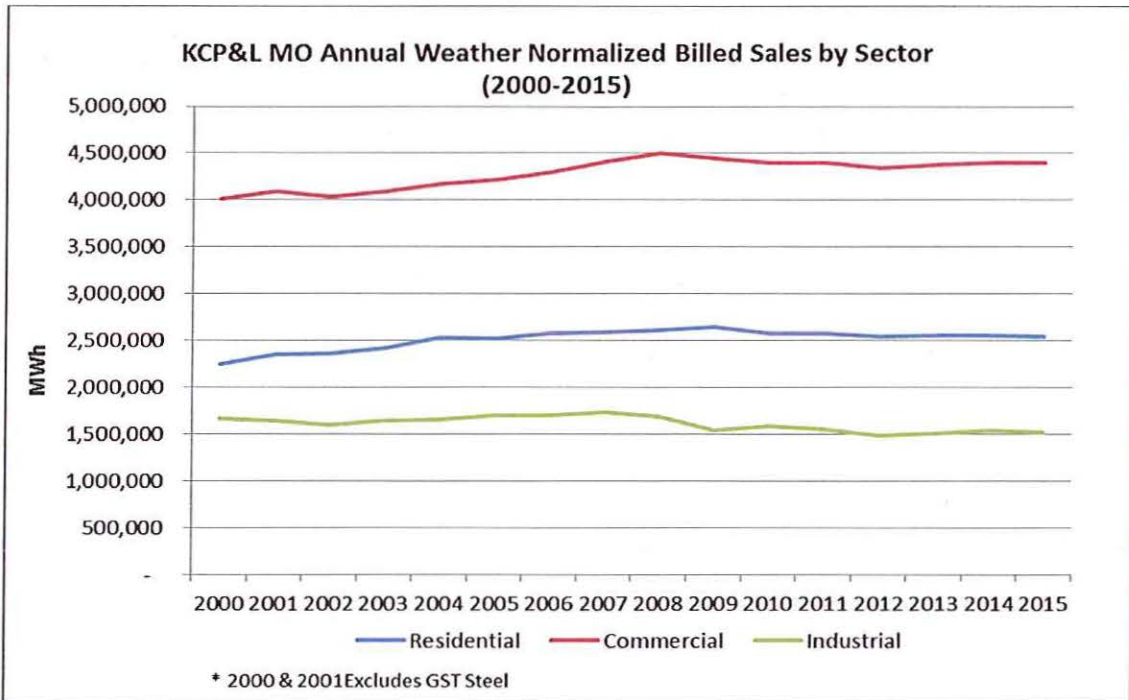
17            The year-over-year growth in retail average use per-customer for the KCP&L MO  
18            service area has steadily declined since the 2008 recession. Prior to the recession and  
19            energy efficiency it had been experiencing growth. Figures 1 and 2 illustrate the decline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



1

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



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

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

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

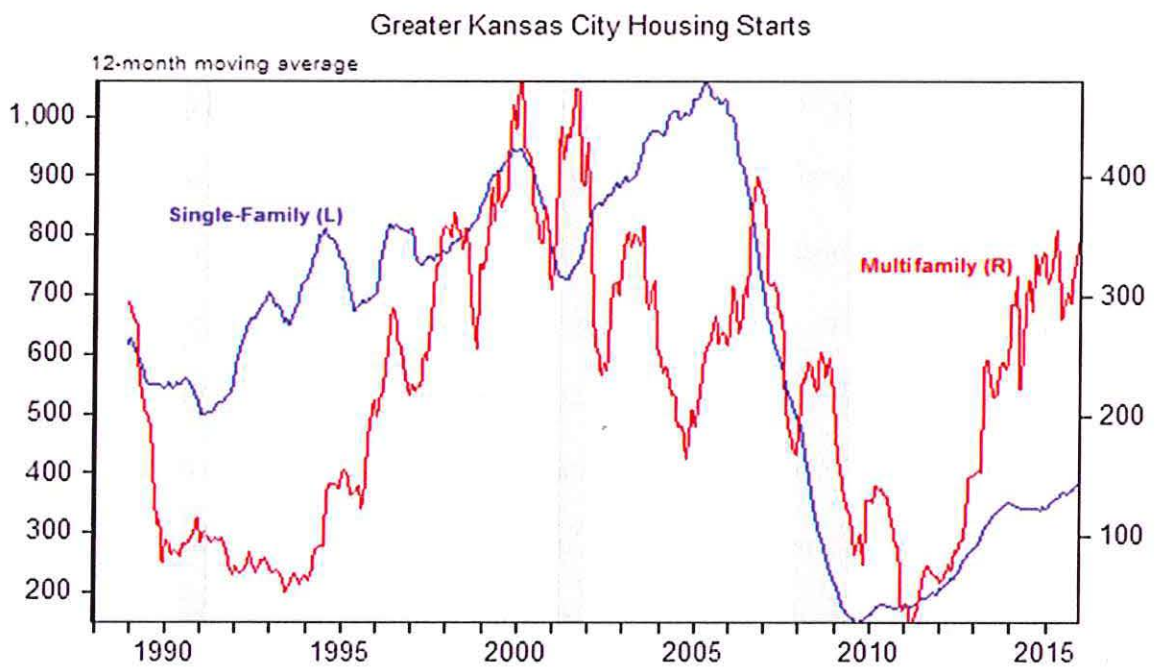
3           Recession Lag: We have never fully recovered from the 2008-2009 recession.  
4           But, the recession alone does not explain the recent decline, rather a variety of changes in  
5           the market place due to the recession and demographic changes after the recession have  
6  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

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

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

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

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



Notes: Starts Date through December 2015.  
Sources: Census Bureau, Home Builders Association.

10 Figure 3: Single-Family & Multifamily - 12 Month Moving Average Housing Starts<sup>4</sup>

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

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

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

1 continue to put downward pressure on average use per customer. By the end of 2017 it is  
2 expected that Missouri will only return to 74% - 85% of normal housing production  
3 levels<sup>5</sup>.

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

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

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

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

16 Federal Standards: The U.S. Department of Energy (“DOE”) issued 10 final rules  
17 in 2014 which was the most ever in one calendar year. The cumulative utility bill savings  
18 to consumer from these new standards issued are estimated to save consumers \$78 billion  
19 through 2030<sup>6</sup>. In December 2015, the DOE announced historic new efficiency standards  
20 for commercial air conditioners and furnaces which is the largest energy saving standard  
21 in history. This standard was developed with industry, utilities, and environmental

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

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



1 groups to save more energy than any other standard issued to date by the DOE. It is  
2 estimated that over the lifetime of these products it will save businesses over \$167 billion  
3 on their utility bills. The new commercial air conditioning and furnace standards will  
4 occur in two phases starting in 2018 with a 13 percent efficiency improvement and five  
5 years later with an additional 15 percent increase in efficiency<sup>7</sup>. Federal Standards will  
6 continue to impact sales over the next 10-20 years resulting in \$1.8 trillion (128  
7 quadrillion British thermal units of energy) in cumulative utility bill savings to consumers  
8 through 2030<sup>8</sup>.

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

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

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

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

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

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

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

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of Kansas City Power & Light            )  
Company's Request for Authority to Implement        )  
A General Rate Increase for Electric Service        )        Case No. ER-2016-0285

**AFFIDAVIT OF ALBERT R. BASS, JR.**

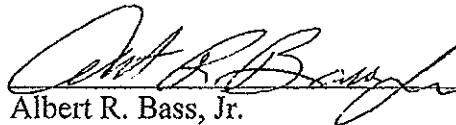
STATE OF MISSOURI    )  
  ) ss  
COUNTY OF JACKSON    )

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

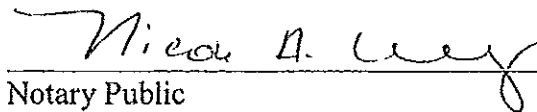
1. My name is Albert R. Bass, Jr. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Manager of Market Assessment.

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

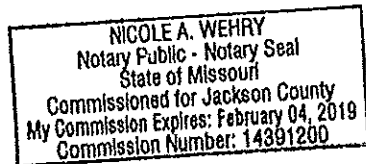
3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

  
Albert R. Bass, Jr.

Subscribed and sworn before me this 15<sup>th</sup> day of July, 2016.

  
Notary Public

My commission expires: Feb. 4, 2019



## WEATHER ADJUSTMENTS TO MONTHLY BILLED SALES OF KCP&L

### NORMALIZATIONS TO MONTHLY MWH SALES

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

## ANNUALIZED ENERGY EFFICIENCY IMPACTS FOR KCP&L

### ENERGY EFFICIENCY ADJUSTMENT TO MONTHLY MWH SALES

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

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

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

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

Note: These numbers include losses.

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

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

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

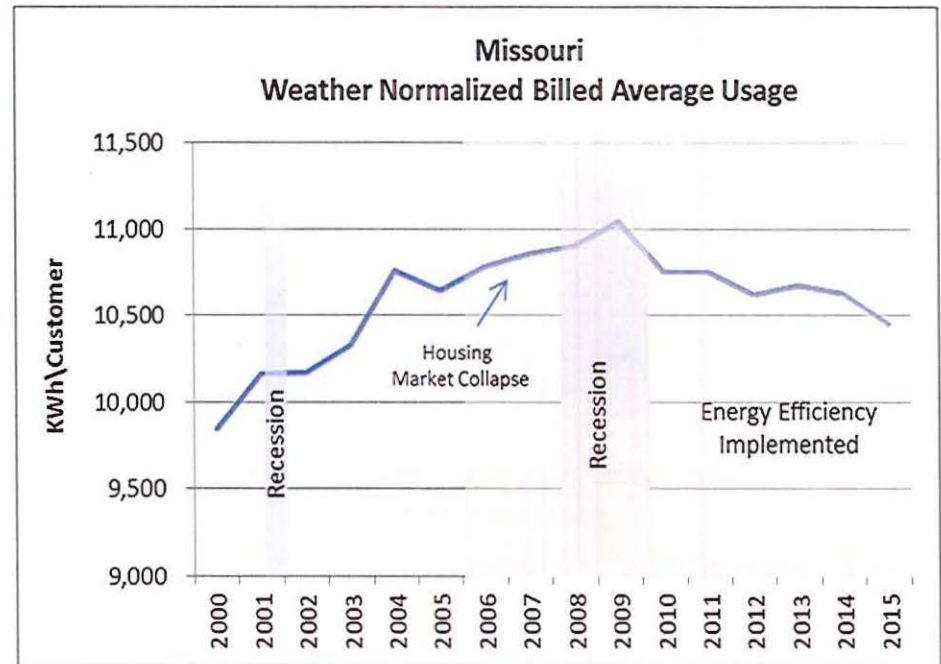
# KCP&L MO RESIDENTIAL WEATHER NORMALIZED BILLED KWH SALES, AVERAGE USE AND CUSTOMERS

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

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

**Compound Annual Growth Rates**

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



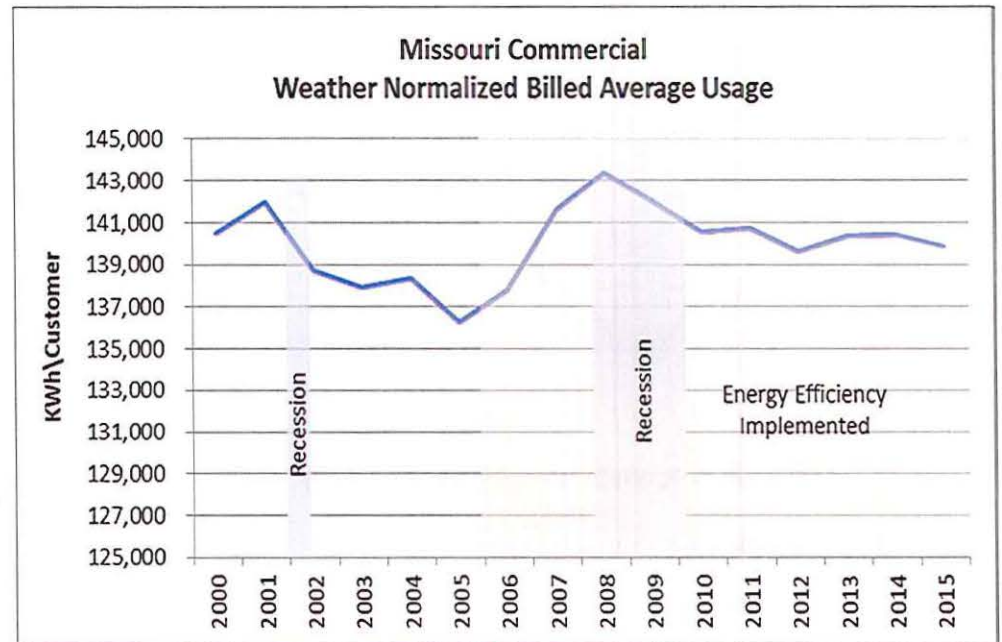
# KCP&L MO COMMERCIAL WEATHER NORMALIZED BILLED KWH SALES, AVERAGE USE AND CUSTOMERS

KCPL Jurisdiction  
WN Commercial Billed KWh Sales and Average Usage

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

**Compound Annual Growth Rates**

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





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

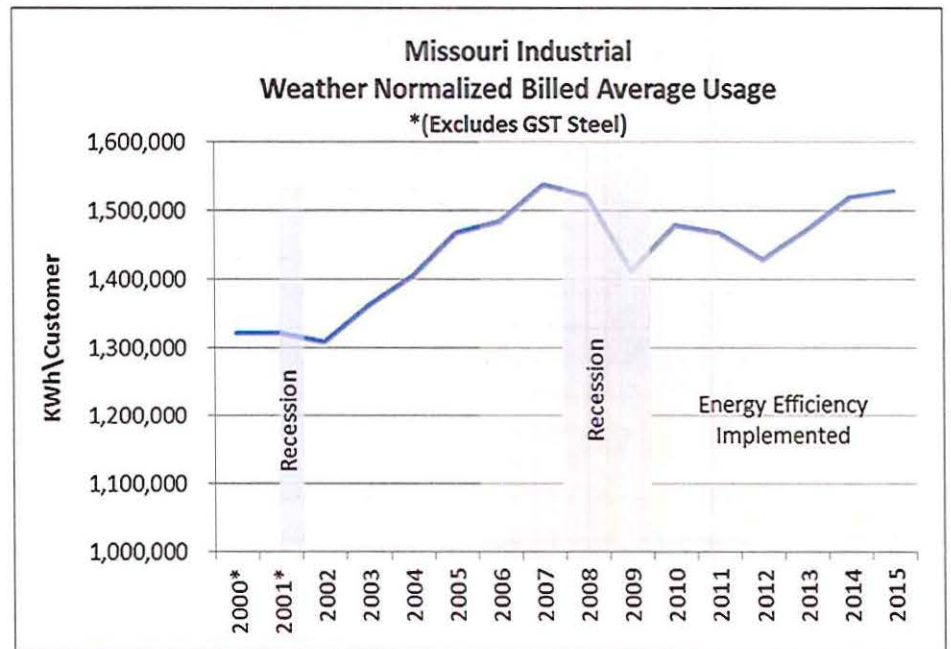
KCPL Jurisdiction  
WN Industrial Billed KWh Sales and Average Usage

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

\*Excludes GST Steel

**Compound Annual Growth Rates**

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



## KCP&L MO PAST ENERGY EFFICIENCY PROGRAM SAVINGS

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

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