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State Corporation Commission
of Kansas

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

DIRECT TESTIMONY OF

MARISOL E. MILLER

ON BEHALF OF
KANSAS CITY POWER & LIGHT COMPANY

IN THE MATTER OF THE APPLICATION OF
KANSAS CITY POWER & LIGHT COMPANY
TO MAKE CERTAIN CHANGES IN
ITS CHARGES FOR ELECTRIC SERVICE

DOCKET NO. 18-KCPE-____-RTS

I. INTRODUCTION AND PURPOSE

Q: Please state your name and business address.

A: My name is Marisol E. Miller. My business address is 1200 Main Street, Kansas City, Missouri 64105.

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

A: I am employed by Kansas City Power & Light Company ("KCP&L" or "Company") as a Supervisor – Regulatory Affairs.

Q: What are your responsibilities?

A: My general responsibilities are to provide support for the Company's regulatory activities in the Missouri and Kansas jurisdictions. Specifically, my duties include class cost of service support, rate design, tariff management, filing preparation, and load research support. I also manage certain analytical activities for the department including rate change implementation, billing determinant calculation, and retail revenue calculation.

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to (i) verify that the Company satisfied the State Corporation Commission of the State of Kansas' ("Commission" or "KCC") minimum filing requirements ("MFR") under Kansas Administrative Regulations ("K.A.R.") 82-1-231 for this rate case; (ii) sponsor the retail revenues used in this filing which reflects the annualized and normalized revenue level for KCP&L's Kansas jurisdiction; (iii) sponsor the Class Cost of Service Study ("CCOS"); and (iv) discuss rate designs proposed, propose changes to KCP&L's current rate tariffs consistent with this revenue requirement increase request as set forth in Exhibit MEM-2, and discuss the rate design study performed and results.

Q: Before addressing these items in more detail, please describe your education, experience and employment history.

A: I hold a Masters of Business Administration degree from Rockhurst University with an emphasis in Management. I also was awarded a Bachelor of Science in Business Administration Magna Cum Laude with an emphasis in Business Finance and Banking/Financial Markets from the University of Nebraska at Omaha. In addition to those academic credentials, the Institute of Internal Auditor's ("IIA") and the Association of Certified Fraud Examiners ("ACFE") have certified me as a Certified Internal Auditor and Certified Fraud Examiner respectively.

I began my career at First Data Corporation working as Financial Analyst/Senior Financial Analyst from October of 1999 until June of 2003. My primary responsibilities included Financial Analysis, Forecasting, & Reporting. I then joined the Sprint

Corporation working there from 2003 until 2006, where my role evolved from work as a Financial Analyst to Internal Audit work focused on Sarbanes Oxley Compliance.

I joined KCP&L in August of 2006 working as a Senior/Lead Internal Auditor. I led various projects of increasing complexity and most notably was the on-site Internal Auditor for the approximately $2 billion Comprehensive Energy Plan Iatan 2 Construction project.

I have worked in the Regulatory Affairs Department since 2011 holding various positions covering areas including Integrated Resource Planning ("IRP"), Missouri Energy Efficiency Investment Act ("MEEIA")/Demand-Side Management ("DSM"), compliance reporting for multiple areas in transmission and delivery, and rate case support.

Q: Have you previously testified in a proceeding before the KCC?

A: Yes. I have provided written testimony before the KCC in Docket No. 17-KCPE-201-RTS. Additionally, I have provided written testimony before the Missouri Public Service Commission in Docket No.'s ER-2018-0146 and ER-2018-0145 and testified in Docket No. ER-2016-0285, supporting the Company's request for a rate increase.

II. MINIMUM FILING REQUIREMENTS

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

A: The purpose of this part of my testimony is to confirm that KCP&L has satisfied the Commission's MFR, as set forth in K.A.R. 82-1-231.

Q: How did KCP&L satisfy the MFR?

A: KCP&L prepared the following information to address the specific requirements of each section of the MFR as outlined in K.A.R. 82-1-231(c)(4):

Section 1:	Application, Letter of Transmittal, and Authorization
Section 2:	General Information and Publicity
Section 3:	Summary of Rate Base, Operating Income and Rate of Return
Section 4:	Plant Investments
Section 5:	Accumulated Provision for Depreciation and Amortization
Section 6:	Working Capital
Section 7:	Capital and Cost of Money
Section 8:	Financial and Operating Data
Section 9:	Test Year/ Pro Forma Income Statements
Section 10:	Depreciation and Amortization
Section 11:	Taxes
Section 12:	Allocation Ratios
Section 13:	Annual Report to Stockholders and the U.S. Securities and Exchange Commission
Section (14,15):	Additional Evidence
Section 16:	Financial Statements
Section 17:	Data by Tariff Table
Section 18:	Proposed Rate Change Schedules/ Rules and Regulations

III. ANNUALIZED/NORMALIZED REVENUES

Q: Were the retail revenues included in this filing prepared by you or under your supervision?

A: Yes, they were.

Q: Please describe the retail revenues used in this filing and the general method used to normalize revenues

A: The revenues reflected in the test year ending September 30, 2017, represent billed revenues adjusted to reflect normal weather. These normalized revenues are used as an input into the revenue requirement model prepared by Company witness, Mr. Ronald Klote. The associated revenue adjustment R-20 is used to reconcile these revenue amounts with other Company records and revenues reported to the Federal Energy Regulatory Commission ("FERC").

The process for calculating normalized retail revenue begins with pulling actual billed sales and customer count for the test year from the Company's Customer Information System ("CIS"). This information is provided to the Company's Energy Forecasting and Analytics group so that they can produce factors that calculate weather normalized kWh sales. Company witness Mr. Albert R. Bass, Jr. explains this process and his results in his Direct Testimony.

Monthly billed revenue for the test year by rate is calculated and includes the actual billing units for each billing block of the various rate components, as well as, customer counts. These rate components are the customer charges, the energy charges, and the demand charges. By applying actual rates to the actual monthly usage in each of the billing blocks, the actual revenues for the test year are reproduced. This process is the basis for determining the total actual retail revenues used in this case.

The Company then determined normalized monthly retail revenues by applying monthly weather normalization factors provided by the Company's Energy Forecasting & Analytics group to apply to actual monthly billing determinants to calculate the weather normalized monthly sales. The normalized sales and customer counts are then multiplied by the rates that took effect June 28, 2017. The sum of these monthly weather normalized revenues was compared to the test year retail revenues per book ending September 30, 2017 to determine the revenue adjustment contained in the Summary of Adjustments attached to Mr. Klote's testimony as Exhibit RAK-4 (adjustment R-20).

Q: The Company has several riders in place to recover particular costs. How will these mechanisms affect the requested increase in this case?

A: The Energy Cost Adjustment ("ECA") rider, the Energy Efficiency Rider ("EER") and the Transmission Delivery Charge ("TDC") are separate from the revenue requirement requested in this case. The Property Tax Surcharge ("PTS") rider base amount has been re-based within the current revenue requirement. The Company calculated its total revenue requirement, including fuel expense, purchased power expense and off-system sales margins, demand-side management costs, and PTS charges and then removed the impact from the revenue requirement amounts which will be recovered under the ECA and EER tariffs, with the remainder of the revenue requirement to be collected in base retail rates.

IV. CLASS COST OF SERVICE STUDY

Q: Please give an overview of the Company's testimony supporting the electric Class Cost of Service study.

A: The CCOS study is supported by the following Company witnesses:

- Bradley Lutz's direct testimony includes a summary of past CCOS studies and production allocation methodologies used, and provides an explanation of the process resulting in a recommended change in the production allocation method.
- Tom Sullivan's direct testimony provides a discussion and support for utilization of the Average & Excess production allocation method.
- This testimony includes discussion of the preparation of the CCOS study filed in this proceeding.

Q: Has the Company performed a CCOS study for this case?

A: Yes, the Company performed a CCOS study representative of the KCP&L Kansas jurisdiction. A summary of the results of the Company's CCOS studies are attached and marked as Exhibit MEM-1.

Q: Was the study prepared by you or under your direct supervision?

A: Yes, it was. Consistent with prior filings, the Company retained the services of Management Applications Consulting who performed the primary CCOS modeling using their proprietary software and data provided by the Company.

Q: Has the Company filed a CCOS in previous rate cases?

A: Yes. In all rate cases filed since 2005, with the exception of the 14-KCPE-272-RTS and 17-KCPE-201-RTS cases which were abbreviated rate cases, the Company has filed a CCOS study.

Q: What is the purpose of the CCOS study?

A: The purpose of the CCOS study is to directly assign or allocate each relevant component of cost on an appropriate basis in order to determine the contribution that each customer class and rate makes toward the Company's overall rate of return. The CCOS analysis strives to attribute costs in relationship to the cost-causing factors of demand, energy and customers.

Q: Would the CCOS study serve as the basis for the determination of increasing or decreasing overall revenue levels for KCP&L?

A: No. Determination of the revenue requirement requested in this case is accomplished using the jurisdictional model sponsored by Company witness Ronald A. Klote. The

CCOS model uses the information from the jurisdictional model as an input for the primary purpose of evaluating the possible distribution of costs to the respective classes.

Q: What classes are used as a basis for this CCOS study?

A: The primary classes the Company used in its analysis are Residential, Small General Service, Medium General Service, Large General Service, and Lighting.

Q: Do these classes and rates conform to the proposed electric rate tariffs?

A: Generally, they do. The Residential class has several rate classifications available to it that include general use, one-meter general use and heat, and a two-meter rate with general use on one meter and a separate meter for space heating. The Small General Service, Medium General Service, and Large General Service classes also have general usage rates, and all electric rates, plus they can be specific to the voltage level at which the customer receives service. The Large General Service class also includes rate codes that are distinguished by the specific voltage at which the customer receives service. In total, the Company has four classes of service (plus Lighting), but has approximately 55 rates to meet the specific needs of the customer, and reporting and billing requirements.

Q: What test year was used for the CCOS study?

A: The study is based on a historical test year of the 12 months ending September 30, 2017, with known and measurable changes projected through June 30, 2018.

Q: What general categories of cost were examined and considered in the development of the CCOS study?

A: An analysis was made of all elements of cost as defined by the Federal Energy Regulatory Commission Uniform System of Accounts, including investment (rate base)

and expense (cost of service) for the purpose of allocating these items to the customer classes. To achieve this allocation we begin by functionalizing and classifying costs.

Q: Please explain what you mean.

A: In order to make the appropriate assignment of costs to the appropriate class of customer, it is necessary to first group the costs according to their function. The functions used in the CCOS study were production, transmission, distribution, and other costs. The next step was to classify the costs. Costs are classified as customer-related, energy-related, or demand-related.

Q: What do you mean by customer-related, energy-related and demand-related?

A: Customer-related costs are those costs necessary to provide electric service to the customer independent of any usage by the customer. Some examples of these costs include meter reading, customer accounting, billing and some investment in plant equipment such as the meter and service line, facilities that are all necessary to make service available. Portions of the distribution facility are separated between the customer costs and the demand costs.

Energy-related costs are directly related to the generation and consumption of energy and consist of such things as fuel and purchased power and certain transmission costs.

Demand-related costs relate to the investment and expenses associated with the Company's facilities necessary to supply the customer's full load requirements throughout the year. The majority of demand-related costs consist of generation, transmission plant and the non-customer portion of distribution plant.

Q: After the above classification of plant investment and operating costs into customer-energy- and demand-related components, what was the next step in the CCOS study?

A: The next step was to allocate each of the three categories of cost to each customer class utilizing allocation factors appropriate for each of the above categories of cost.

Q: How are the allocation factors generally determined?

A: Costs are evaluated to determine the cause driving the cost to be incurred and to establish an allocation method that best distributes the cost based on that causation. Customer-related costs are generally allocated on the basis of the number of customers within each class. Data for the development of the customer-related allocation factors came from Company billing and accounting records. Some of the customer-related accounts were allocated based on a weighted number of customers to reflect the weighting associated with serving those customers.

Energy-related allocation factors were derived on the basis of each customer classes' respective energy (kilowatt hour) requirements. Kilowatt-hour ("kWh") sales to each customer class were available from Company records. The sales data was adjusted to reflect normal weather, system losses and unaccounted for, in order to assign the Company's total system output.

Q: How are class demand allocation factors generally determined?

A: The data necessary to develop class demand allocation factors (production and transmission) were derived from the Company's load research data. Such data consisted of the hour-by-hour use of electricity by each customer class throughout the study period.

Q: Was KCP&L's load research data used to develop any other allocators?

A: Yes, it was used to develop distribution plant allocators based on customer's non-coincident loads within each class.

Q: Are any costs assigned directly to classes?

A: Yes. In instances where the costs are clearly attributable to a specific class, they are directly assigned to that class.

Q: What method do you propose to allocate production plant?

A: After considering all allocation theories and ensuring that the selected method aligned with the principles of reflecting actual planning and operating characteristics, cost causation, recognizing the broad set of customer class characteristics and their usage, and producing stable results on a year to year basis, the Company selected the utilization of the Energy Weighted approach, specifically the Average & Excess Production Plant Allocation method, incorporating a four (4) Coincident Peak ("CP") component. An Energy Weighted approach was viewed to be cost effective, balanced through its incorporation of energy, and less subjective than other methods. Utilization of the Average & Excess ("A&E") method is an energy-weighted method of production plant allocation that gives classes a reasonable balance between the energy and capacity function of generating facilities. This is a shift from allocation methods used in the last several rate cases. Please see direct Testimonies of Company witnesses Bradley Lutz and Tom Sullivan for more information on other factors that contributed to the decision to utilize the A&E method and the reasonableness of that decision.

Q: Has this allocation method been proposed before?

A: Yes. Company witness Tom Sullivan identifies in his direct testimony other companies in the region that have proposed this method. In addition, other parties have proposed variations of this method in testimony through many KCP&L rate case dockets in Missouri.

Q: How were the fuel costs associated with the production plant allocated in the CCOS study?

A: Fuel costs were allocated using a monthly kWh allocator. Based on monthly fuel costs from the Company for the 12 months ended September 30, 2017, each month's fuel costs were allocated to each customer class's corresponding calendar month kWh sales adjusted for losses. These allocated results were summed by rate and major customer class to identify a proxy fuel allocator which was then used to allocate the actual fuel costs shown in the CCOS study.

Q: How were the off-system sales margins that KCP&L receives from its external sales of energy allocated?

A: They were allocated using the Energy allocator.

Q: What method did you use to allocate transmission plant costs?

A: Transmission plant costs were allocated using twelve coincident peaks ("12CP").

Q: What method did you use to allocate Distribution Plant?

A: Distribution Plant was primarily allocated using a Non-Coincident Peak ("NCP") demand allocator based on the use of NCP class demands for Primary Plant in Accounts 360 through 367, with the exception of Account 363, which used a 12-CP demand allocation.

Also, Accounts 364, 365, 366 and 367 included methods to recognize primary and secondary voltage cost separation.

Q: What method did you use to allocate Line Transformers and secondary plant?

A: Line Transformers and secondary plant costs were allocated to customers receiving secondary service based on the weighted average of the diversified class demands (NCP) and undiversified individual customer maximum demands.

Q: What method did you use to allocate Services?

A: Since we consider services customer-related, these costs were allocated based on the customers total diversified maximum customer demands.

Q: What method did you use to allocate Meters?

A: Meter costs, recorded to Account 370, are also customer-related and were allocated using an assignment of all meters and metering devices to customer rates.

Q: Did you include any other rate base elements in the study?

A: Yes, multiple rate base elements have been included. The following details their allocation:

- Additions to net plant included cash working capital, materials and supplies, prepayments, fuel inventory, and various regulatory assets.
- The cash working capital component of rate base was developed and allocated on related expenses or plant in the CCOS study.
- Materials and supplies were allocated on total plant and demand allocation factors.
- Prepayment items were allocated using total plant, customers, and demand allocation factors.

- Fuel inventory was allocated on energy.
- The regulatory assets were allocated on customer or demand allocation factors depending on the costs tracked.
- The accumulated deferred income taxes were allocated on total plant.
- Customer advances for construction were allocated on total distribution plant.
- Customer deposits were developed using the data analysis by customer group available from the Company.

Q: What revenues did you use for this study?

A: The class and rate revenues were developed under my supervision and were discussed earlier in this testimony. Other sources of revenues such as Miscellaneous Revenues were allocated consistent with the revenue source.

Q: How were Operation and Maintenance ("O&M") Expenses allocated?

A: O&M Expenses were allocated using various methods dependent of the cost causation. O&M for production, transmission and distribution plant were allocated to customer classes following plant. Customer Accounts Expenses, Customer Services and Information Expenses, Sales Expenses, and Administrative and General Expenses were allocated based on the results of individual allocation studies. Administrative & General expenses were primarily allocated on the labor allocator with the exception of the following:

- Account 930.1, General Advertising, which was allocated based on the number of customers
- Account 928, Regulatory Commission expenses, which was primarily allocated to classes on revenues at the uniform claimed rate of return

- Account 935 Maintenance of General Plant, which was allocated on general plant.

Q: What is the next step after the allocations are applied?

A: The next step is to determine the relative return on rate base for each of the classes and rates in the study. The ratio of class revenues less expense (net operating income) divided by class rate base will indicate the rate of return being earned by the Company that is attributable to a particular class. It is necessary to keep in mind that this calculation only represents a snapshot in time. The results of the CCOS study will most likely vary over time. The results of the study will also vary if you apply different allocation factors to the study. By applying different methods to the allocation process, you can change the outcome of the CCOS study.

Q: What were the results of the CCOS study?

A: The overall jurisdictional rate of return was calculated to be 6.3%. Individual classes' rates of return at current rates vary, and based on the current costs, are shown in the following table.

Residential	Small General Service	Medium General Service	Large General Service	Lighting
4.4%	7.0%	9.2%	9.2%	8.0%

Q: If rates were changed so that KCP&L earned the same rate of return from each customer class, how much would each class's rates need to change?

A: To achieve an overall jurisdictional revenue increase of 4.7%, the classes should be adjusted by the percentages in the table below.

Residential	Small General Service	Medium General Service	Large General Service	Lighting
15.0%	1.8%	-7.3%	-6.7%	-2.3%

Q: What general conclusion can be made from these results?

A: The results of the CCOS study show that each class of customers recovers cost of service to that class and provides a return on investment. The results also show the Residential class revenue is well below the Total Kansas ("KS") Retail rate of return level while the Small General, Medium General, Large General Service, and Lighting class revenues are above.

Q: In addition to the class results, was the study used to provide any additional information?

A: Yes, another element of the study was to explore costs at the rate level. This data provides additional information to aid the Company in preparing its rate design. Exhibit MEM-1 is attached and contains this rate level information.

Q: Is seasonality still reflected in the study?

A: No. Seasonality has been removed from the study because such consideration more closely relates to rate design.

Q: Are you proposing changes to the class revenues based on the results of the study?

A: Yes.

Q: Are you proposing changes to class revenues that are reflective of an equalized rate of return by class?

A: No. The exact application of changes in rates that aim for an equalized rate of return by class would have been extremely detrimental to our residential customers and not in line with sound rate design principles. Instead, the Company opted for a gradual approach to adjusting revenues and rates. Utilizing the results from the study prepared based on the

Average & Excess production allocation; the Company has identified the following recommended changes to class revenues:

- Apply an 8.43% increase to the Residential class, and
- Apply a 2.85% increase equally to the remaining classes

Application of these proposals to the electric rates is discussed further in the rate design section of this testimony. The application of the above increases by class by billing component can be found in attached Exhibit MEM-2. The summary of revenues and proposed increase by class may be found in Exhibit MEM-4.

Q: In proposing class revenue shifts, is there an expectation of rate switchers that should be considered and taken into account?

A: Yes. Revenue losses associated with potential rate switching resulting from the above rate changes are possible. Rate Switching is the movement of customers to a more advantageous rate resulting from the application of the proposed rate increase. This movement is not otherwise accounted for in the rate design and would represent an immediate reduction in the revenue recovered by the Company. The Company plans to size this impact by the June 30, 2018 update and if possible, sooner.

V. RATE DESIGN

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

A: Yes, I am.

Q: Are you proposing any revision to the Company's rate design?

A: Yes.

Q: Please summarize the proposed rate design recommendation for the electric tariffs and any additional proposed changes to the tariffs?

A: The Company is requesting an overall increase of $26.1 million or 4.53% ($32.9 million including the Property Tax Rebase 5.70% increase). Looking at the revenue component that is the subject of my rate design proposal, the proposed requirement is approximately $610.8 million, an increase of $32.9 million, or about 5.70%, over the current Kansas jurisdictional base revenue requirement of $577.9 million. After considering the CCOS study results and the implications of class revenue shifts, the Company is proposing that the requested increase be applied to all classes, Residential, Small General Service, Medium General Service, Large General Service, and Lighting, with the Residential class receiving an increase of 8.43% and the remaining classes receiving an increase on an equal percentage basis or 2.85%. Please see Exhibit MEM-2 for the proposed retail rates associated with this request. Within the classes, the Company is proposing a number of changes. Those changes include:

- Residential
  - Apply increase equally across all bill components
  - Add a Distributed Generation sub-class, applicable to new distributed generation customers, consistent with guidance provided in the KCC order in Docket No. 16-GIME-403-GIV
  - Offer a Residential Time of Use ("TOU") Pilot
  - Offer a Residential Demand Pilot
  - Offer a Residential TOU Pilot with a Demand Rate

- Commercial and Industrial
  - Apply equal percentage increase to all rates within the class with application of increase to fixed billing components only (e.g. customer charge, facilities demand, demand, etc.)
  - Offer an Off-Peak Rider to the Large General Service class
- Special Rates
  - Eliminate Real Time Pricing and Real Time Pricing Plus tariffs
  - Modify Public Electric Vehicle Charging Station Service
  - Offer a new Renewable Energy Rider
  - Offer a new Solar Subscription Rider
  - Offer a new Standby Service Rider
  - Offer two new Demand Side Management Pilot Programs: The Residential Home Energy Report Pilot program and the Residential Smart Thermostat Pilot program
  - Modify the Energy Efficiency Rider to account for recovery of program costs for the above Energy Efficiency/demand side programs that will be packaged with the Residential Pilot Rates.
- Lighting
  - Propose Light Emitting Diode ("LED") Municipal Street Lighting and LED Private Lighting tariffs
  - Add LED options to Municipal Ornamental Street Lighting Service tariffs
  - Freeze High Pressure Sodium Private Unmetered Protective Lighting Service tariffs

- Modify the Availability section of the Off-Peak Lighting Service Tariff to allow both metered and unmetered customer participation.
- Cancel Commercial Street Lighting Tariff

- Rules & Regulations
  - Modify Point of Delivery in the Definition section based on Commission Staff recommendations from Docket No. 17-KCPE-433-COM
- Miscellaneous Changes
  - Update the Table of Contents to address new tariffs or modifications of existing tariffs.

Q: Before you describe the details of the proposed rate design, please take a moment and describe the current KCP&L rate structure.

A: The Company's overall rate structure is comprised of five individual customer groups, called classes (Residential, Small General Service, Medium General Service, Large General Service, and Lighting). Each class has subclasses within the class; for example, RESA as the Residential General Use and RESC as the Residential Space Heating – One Meter subclass. Charges for each class are levied through a combination of four components - all classes have a fixed charge (Customer Charge), and depending on the size of service, up to three variable charges (Facility Charge, Demand Charge, and Energy Charge). The subclasses for Residential, Small General Service, Medium General Service and Large General Service rates are distinguished further between general use and customers with electric space heating. Non-residential rates are broken down further between primary, secondary, and in the largest class, substation and transmission voltages. Most rate components are segmented into declining blocks which provide lower

rates for higher levels of usage. The declining block structure is used because typically not all fixed costs are recovered in the Customer, Demand or Facility charges and it allows for recovery of most other fixed charges in the first block of the rate. The latter blocks primarily recover non-fuel variable costs with a smaller contribution to fixed costs.

All classes, except for the Lighting classes, have lower rates for winter usage compared to summer rates. KCP&L is a summer peaking utility, meaning the highest demand occurs during the summer months. This means that the electric plant installed to meet this summer demand, which is available year-round, may not be fully utilized by retail customers in the wintertime.

Q: Beginning with the Residential rate class, the summary above includes a TOU rate pilot, a Demand rate pilot, and a TOU plus Demand rate pilot. Are these new Residential Pilot rates?

A: Yes.

Q: What prompted the Company to propose these Residential Pilots Rates?

A: In its 2016 rate case, KCP&L Greater Missouri Operations Company's ("GMO") was ordered by the Missouri Public Service Commission to perform a rate design study in its next rate case. GMO retained the consulting services of Burns & McDonnell ("BMcD") to conduct this study. The TOU Rate Study ("Study") consisted of collecting information and conducting qualitative and quantitative analyses of the existing GMO Residential and Small General Service rates and analyzing new Residential and Small General Service TOU rate designs.

The development and design of rates for the Residential and Small General Service classes was based upon consideration of Company goals, application of good rate making principles, consideration of the qualitative ratings, comparison to common practice, and the experience of BMcD in this area. Further, the designs were evaluated using load research and CCOS analysis, designed to be revenue neutral to the existing rates in each class, reflect the utility's CCOS by season and time-period, and to meet GMO and KCP&L's rate design objectives described in the report.

The Study recommendations include offering three new Residential rate options: (1) a Demand Rate, (2) a TOU Energy rate, and (3) a combination TOU Energy and Demand Rate. Results of the pilot should be used to make informed decisions about the rate design and the required system configurations before rolling out other rate modifications to a larger number of Residential and Small General Service customers.

The Study also includes the recommendation that the Missouri Energy Efficiency Investment Act ("MEEIA") be used as the foundation for the optional rates and that they be MEEIA programs in the next MEEIA Filing. The recent DSM potential study analyzed these rate options as demand side measures to address requirements outlined in the Missouri Chapter 22 Electric Utility Resource Planning ("IRP"). These rates are proposed, in part, to attempt to achieve the potential demand side benefit identified in the IRP process. However, the IRP process largely ignores the ratemaking process, particularly, the treatment of revenue recovery, as it assumes perfect rate making. Since that is not a reasonable outcome and since these rate design options align with the goals of MEEIA, it would be appropriate to explore possible inclusion as a MEEIA program that recognizes the need for the Company to be kept whole when promoting energy

efficiency, demand response programs, and demand-side rates that are expected to impact the company's revenue requirement and ability to recover fixed costs.

Q: If this was a GMO specific study, why are you discussing it in this case?

A: While the TOU study resulted from a GMO rate case order, the study did consider other jurisdictions. As KCP&L sees potential value in these programs, it is intending to offer these pilots in all its jurisdictions, GMO, KCP&L-MO, and KCP&L-KS.

Q: How were the study results used in this case?

A: The Company is including a proposal to offer to Residential Customers a Demand Rate Pilot, a TOU Energy Pilot, and a pilot for a combination TOU Energy Rate and a Demand Rate in this rate case filing.

Q: Did you propose every single Burns & McDonnell recommendation in this case?

A: No. There were many recommendations that were made over an extended timeline contingent upon many external factors and assumptions. Those factors include technology requirements (e.g. 100% Advanced Metering Infrastructure ("AMI") roll-out), rate case outcomes, and pilot results over time, etc. The most significant recommendation that was not included in this filing is a pilot offering for the Small General Service ("SGS") class. Given the expected demand response and limited impact to the SGS Summer Load, it was decided that the focus would be on the Residential pilot offerings at this time.

Q: Why are the proposals only being filed as pilots?

A: The Company plans to ensure pilot success by tracking and analyzing pilot program results/progress. This data will be used to assess future rate design modifications, as well as, learn more about customer needs and wants, given available technology and

information, and to help improve customer education. It will take some time to analyze, as well as, modify the pilot into a broader implementation that will be beneficial to most customers in the Residential class. In the meantime, these pilot programs should be beneficial and effective, following sound rate design principles that include supporting efficient use of energy, utilization of cost of service based rate designs, providing revenue sufficiency and stability and providing customer value and satisfaction, while minimizing negative customer impact, including rate shock.

Q: Did the Company include the exact rates from the TOU study in the proposed pilot tariffs?

A: No, while the TOU study utilized the latest available CCOS studies and load research, the underlying data was no longer current when the Company developed its pilot rates. Therefore, the Company considered the latest available load research and CCOS information in this case for purposes of guiding the proposal of the pilot rates. Those rates should be refined as better information is made available.

Q: Are there any potential hurdles that might impact the Company's ability to offer these programs in KS?

A: Yes. As discussed in more detail in the Direct testimony of Company witness Tim Rush, the TOU study recognizes the probable negative impact of these pilots to the Company's revenues/financials, and as such, particularized accounting treatment is necessary to allow the Company to move forward with the programs, as well as a potential delay in the effective date of the tariffs.

Q: Are there additional details of the Residential rate design proposal you can offer?

A: Yes. The residential class is getting an equal and across the board increase of 8.43%

applied to all bill components (e.g. customer charge, energy charge, etc.). Additionally, the Company proposes the creation of a Residential distributed generation subclass consistent with guidance provided by the Commission in Docket No. 16-GIME-403-GIE. Please see the Direct testimony of Company witness Bradley Lutz for more details on this new rate. Also, as noted in the previous section of my direct testimony, the Company is proposing three new residential pilots including a TOU Energy Pilot, TOU Demand rate Pilot, and a TOU Energy + Demand rate Pilot. These pilots are being offered as a result of a TOU rate design study performed and are limited to 1,000 customers for each pilot. To maximize savings and customer benefits, these pilots may be offered in conjunction with demand side management programs, which the Company will be seeking program cost recovery for in the EER. For more information on the DSM Pilot programs that may be offered with the Residential Pilot rates, please see the direct testimony of Company witness Kim Winslow. For more information on the recovery of program costs through the EER of these programs and Company's request for proper recovery of all costs/losses associated with these pilots, please see the direct testimony of Company witness Tim Rush.

Q: What is the typical customer impact resulting from the above residential rate design changes?

A: A typical customer is a representation of average customer consumption used for the purpose of communicating the impact of the proposed increase. I average the seasonal usage within the Residential and Small General Service rates having the largest number of customers. For this case, an average household uses 1,366 kWh in a summer month and 833 kWh in winter month. An average small general service customer uses 1,442

kWh in a summer month and 1,156 kWh in a winter month. I then calculate the annual electric expense associated with that consumption, allowing me to calculate the impact. With an overall increase of approximately $26.1 million, the typical residential customer will experience an increase of approximately $7.29 per month and a typical small general service customer will experience an increase of $2.66 per month under these proposed rates.

Q: Now, concerning the Commercial and Industrial Rates, what are the details of the rate design proposal?

A: For the Small General Service, Medium General Service, and Large General Service classes I am proposing these classes receive an equal increase of 2.85%, which is approximately 50% off the overall 5.70% increase for base rates. In order to address fixed/variable cost recovery imbalance, I am proposing to apply 100% of the Commercial & Industrial rate increase to the non-energy components only.

Q: What is the Company proposing concerning its Non-Residential Special Rates?

A: The Company proposes offering an Off-Peak Rider for the Large General Service class. This Rider has been in place in Company's KCPL-MO jurisdiction for some time now and has recently been proposed to be offered in the GMO jurisdiction. This Rider is meant to encourage the Large General Service class customers to shift load to off-peak periods by providing them a means to exceed their on-peak demand during the off-peak period and not be billed for that excess demand. The Company also is proposing to eliminate the Real Time Pricing tariff. There are no non-residential Real Time Pricing customers in Kansas at this time. As no customers are currently being served on these rates, eliminating these rates has no customer impact. Additionally, the Company is

offering a number of new tariffs including a Renewable Energy Rider, a Solar Subscription Rider, and a Standby Service Rider. Please see the direct testimony of Company witness Bradley Lutz for more details on these new tariffs. The Renewable Energy Rider is expected to have an impact on the recovery of fuel costs. Discussion and more details regarding this impact on the ECA can be found in the direct testimony of Company witness Tim Rush. Lastly, the Company is proposing modification to the Public Electric Vehicle Charging Station Service tariff. Please see the direct testimony of company witness Tim Rush for more details on these modifications.

Q: What is the Company proposing concerning its Lighting rates?

A: The Company is proposing that the Lighting class receive an increase of 2.85%, which is equivalent to approximately 50% of the overall 5.70% increase requested for base rates. Additionally, the Company is proposing an LED Municipal Street Lighting tariff, an LED Private Lighting tariff, and adding LED options to Municipal Ornamental Street Lighting Service Tariffs. Please see the direct testimony of company witness Bradley Lutz for more details on these lighting changes and additions.

Q: Will any of the above rate design changes result in an impact to revenues?

A: It's possible that the offering of the LGS Off-Peak Rider may result in a change to revenues. The Company plans to size this impact by the Update and if possible, sooner.

Q: Is the Company proposing any additional changes to its rate tariffs?

A: Yes. The Company is taking the opportunity in this case to address a number of clean-up and improvements within the rate tariffs. All changes noted above can be found summarized in Exhibit MEM-3.

Q: What is the Company proposing concerning its Rules and Regulations?

A: The Company has reviewed its Rules and Regulations and identified a number of changes to propose in this case. In general, the Company seeks certain changes to the rules and regulations for consistency purposes, and other changes to better align the Rules and Regulations with current costs or planned business practices. Specific details concerning the proposed changes can also be found in Exhibit MEM-3.

Q: In summary, do you believe the rate designs and changes to the Rules and Regulations are appropriate?

A: Yes. I have proposed changes that balance the needs of the Company with the needs of the Customer, using the CCOS study to adjust rate components based on cost causation. The proposed rate design incorporates gradual rate changes that consider the impact on a customer's bill and the revenues received by the Company. In total, the rate designs make movement toward a flexible, cost-driven rate structure. The Rule and Regulation changes seek to simplify and update our operating procedures to help ensure continued quality service to our customers.

Q: Does that conclude your testimony?

A: Yes, it does.

BEFORE THE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Kansas City Power & Light Company to Make Certain Changes in Its Charge for Electric Service	))))	**Docket No. 18-KCPE-____-RTS**

AFFIDAVIT OF MARISOL E. MILLER

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Marisol E. Miller, being first duly sworn on his oath, states:

1. My name is Marisol E. Miller. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Supervisor – Regulatory Affairs

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Kansas City Power & Light Company consisting of twenty-eight (28) 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.

Marisol E. Miller

Subscribed and sworn before me this 1st day of May 2018.

Notary Public

My commission expires: 4/26/2021

ANTHONY R WESTENKIRCHNER
Notary Public, Notary Seal
State of Missouri
Platte County
Commission # 17279952
My Commission Expires April 26, 2021

Kansas City Power & Light Company
2018 RATE CASE - DIRECT
COST OF SERVICE - Kansas Jurisdiction
TY 9/30/17; K&M 6/30/18

Allocation Method: Production & Transmission - Avg & Excess 4 CP

LINE NO.	DESCRIPTION	ALLOCATION BASIS	KANSAS RETAIL	RESIDENTIAL	SMALL GEN. SERVICE	MEDIUM GEN. SERVICE	LARGE GEN. SERVICE	TOTAL LIGHTING
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
0010	**SCHEDULE 1 - SUMMARY OF OPERATING INC & RATE BASE**							
0020								
0030	OPERATING REVENUE							
0040	RETAIL SALES REVENUE	TSFR 9 90	708,385,982	352,031,509	51,678,967	85,130,806	211,602,027	7,942,672
0050	OTHER OPERATING REVENUE	TSFR 9 340	54,795,426	24,905,696	3,290,057	6,442,618	19,677,108	479,947
0060	TOTAL OPERATING REVENUE		763,181,408	376,937,206	54,969,024	91,573,425	231,279,135	8,422,619
0070								
0080	OPERATING EXPENSES							
0090	FUEL	TSFR 9 4080	101,853,218	45,888,862	6,039,752	12,081,429	37,019,168	824,007
0100	PURCHASED POWER	TSFR 9 4090	63,030,987	28,074,483	3,738,757	7,474,928	23,210,339	532,479
0110	OTHER OPERATION & MAINTENANCE EXPENSES	TSFR 9 4100	217,776,511	125,263,099	15,395,028	21,921,408	53,389,934	1,807,041
0120	DEPRECIATION EXPENSES (AFTER CLEARINGS)	TSFR 5 1400	130,439,716	72,732,465	8,691,368	13,910,886	33,075,685	2,029,313
0130	AMORTIZATION EXPENSES	TSFR 9 4620	21,798,762	12,132,857	1,836,312	2,307,767	5,297,018	224,808
0140	TAXES OTHER THAN INCOME TAXES	TSFR 9 4750	52,432,608	29,727,437	3,437,904	5,522,676	13,222,008	522,584
0150	CURRENT INCOME TAXES	TSFR 11 830	31,705,058	8,184,978	3,198,685	5,954,986	13,673,330	693,079
0160	DEFERRED INCOME TAXES	TSFR 11 910	(3,610,936)	(2,047,212)	(233,659)	(381,974)	(910,977)	(37,113)
0170	TOTAL ELECTRIC OPERATING EXPENSES		615,425,924	319,956,970	42,104,147	68,792,106	177,976,504	6,596,198
0180								
0190	NET ELECTRIC OPERATING INCOME		147,755,484	56,980,236	12,864,876	22,781,319	53,302,631	1,826,421
0200								
0210	RATE BASE							
0220	TOTAL ELECTRIC PLANT	TSFR 3 190	4,586,347,518	2,600,219,769	296,777,147	485,155,491	1,157,057,051	47,138,061
0230	LESS: ACCUM. PROV. FOR DEPREC	TSFR 6 1700	1,764,056,647	1,010,677,233	111,449,635	184,500,932	439,347,779	18,081,068
0240	NET PLANT		2,822,290,871	1,589,542,536	185,327,512	300,654,559	717,709,272	29,056,993
0250	PLUS:							
0260	CASH WORKING CAPITAL	TSFR 2 40	(38,547,174)	(21,343,295)	(2,742,584)	(4,171,590)	(9,882,295)	(407,408)
0270	MATERIALS & SUPPLIES	TSFR 2 120	58,514,223	32,545,602	3,675,109	6,324,818	15,470,132	498,562
0280	PREPAYMENTS	TSFR 2 190	6,064,209	3,347,881	371,106	655,801	1,653,955	35,466
0290	FUEL INVENTORY	TSFR 2 260	52,123,382	23,483,624	3,090,843	6,182,671	18,944,558	421,685
0300	REGULATORY ASSETS	TSFR 2 320	87,066,284	38,104,644	36,895,434	7,429,222	4,612,609	24,375
0310	LESS:							
0320	CUSTOMER ADVANCES FOR CONSTRUCTION	TSFR 2 380	2,109,759	1,301,999	163,615	209,962	375,575	58,608
0330	CUSTOMER DEPOSITS	TSFR 2 390	1,808,988	633,957	962,977	164,592	47,462	0
0340	DEFERRED INCOME TAXES	TSFR 2 400	630,337,674	357,368,576	40,788,409	66,678,720	159,023,416	6,478,553
0350	DEFERRED GAIN ON SO2 EMISSIONS ALLOWANCE	TSFR 2 410	24,216,283	10,786,117	1,436,417	2,871,841	8,917,330	204,577
0360	DEFERRED GAIN(LOSS) EMISSIONS ALLOWANCE	TSFR 2 420	20,801	9,265	1,234	2,467	7,660	176
0370	TOTAL RATE BASE		2,329,018,290	1,295,581,077	183,264,767	247,147,899	580,136,786	22,887,760
0380								
0390	RATE OF RETURN		6.344%	4.398%	7.020%	9.218%	9.188%	7.980%
0400	RELATIVE RATE OF RETURN		1.00	0.69	1.11	1.45	1.45	1.26
0410								
0420								
0430								
0440								
0450								
0460								
0470								
0480								

Kansas City Power & Light Company
2018 RATE CASE - DIRECT
COST OF SERVICE - Kansas Jurisdiction
TY 9/30/17; K&M 6/30/18

Table 4
Cost of Service Results – Unbundled Customer, Demand and Energy Cost Components

Line No.	Customer Class (a)	Uniform Rate of Return @ 7.38% Monthly ($) Customer Charge (b)	Energy Costs ($/kWh) Annual (c)	Demand Costs ($/kWh) Annual (d)
1	RESIDENTIAL	$11.52	0.0206	0.1106
2	Regular	$11.20	0.0210	0.1205
3	Time of Day	$12.31	0.0209	0.1135
4	Space Heating	$11.48	0.0199	0.0924
5	Separately Metered-Space Heating	$15.88	0.0194	0.0858
6				
7	SMALL GS	$41.71	0.0203	0.0877
8	Regular (Primary & Secondary)	$42.58	0.0204	0.0887
9	Other (Unmetered)	$3.73	0.0202	0.0797
10	All Electric	$43.31	0.0197	0.0797
11	Separately Metered	$81.33	0.0194	0.0743
12				
13	MEDIUM GS	$57.56	0.0203	0.0802
14	Primary	$133.22	0.0190	0.0625
15	Secondary	$55.52	0.0204	0.0817
16	All Electric	$64.39	0.0200	0.0734
17	Separately Metered	$95.15	0.0198	0.0747
18				
19	LARGE GS	$74.82	0.0199	0.0631
20	Primary	$157.41	0.0197	0.0630
21	Secondary	$67.73	0.0202	0.0666
22	All Electric	$68.52	0.0197	0.0598
23	Separately Metered	$122.14	0.0198	0.0615
24	Substation	$716.69	0.0191	0.0510
25	Transmission	$716.58	0.0190	0.0480
26				
27	TOTAL LIGHTING	$77.82	0.0194	0.0515

Notes:
(1) Allocation Method: Production & Transmission - Avg & Excess 4 CP

	A	B	C	D	E
1	**Kansas City Power & Light - Kansas**				
2	**Residential**				
3					
4	**Case No.**	**18-KCPE-xxx-RTS**			
5	**Status:**	**Ordered**			
6					
7	INPUT FOR MODEL				
8			**Present Rates**	**Rates w/ Increase**	**Proposed Rates**
9	**JURIS INCREASE (%)**			**0.000%**	**8.427%**
10	**CUSTOMER CHARGE (per month)**				
11		One Meter - Rate Code (2RS1A; 2RSDA; 2RS6A; 2RW6A; 2RO1A):	14.00	14.00	15.18
12		Two Meter - Rate Code (2RS2A; 2RS3A; 2RW7A):	14.00	14.00	15.18
13					
14	**ENERGY CHARGE (per kWh)**				
15	All rates less Other Use - SUMMER - Rate Code (All less 2RO1A):				
16		First 1000 kWh per month	0.10751	0.10751	0.11657
17		Over 1000 kWh per month	0.10751	0.10751	0.11657
18					
19	Other Use - For all kWh - SUMMER - Rate Code (2RO1A):		0.12551	0.12551	0.13609
20					
21	General Use - WINTER - Rate Code (2RS1A; 2RSDA):				
22		First 1000 kWh per month	0.08300	0.08300	0.08999
23		Over 1000 kWh per month	0.08300	0.08300	0.08999
24					
25	General Use and Space Heat - One Meter - WINTER - Rate Code (2RS6A; 2RW6A):				
26		First 1000 kWh per month	0.07474	0.07474	0.08104
27		Over 1000 kWh per month	0.06524	0.06524	0.07074
28					
29	General Use and Space Heat - Two Meter - WINTER - Rate Code (2RS2A; 2RS3A; 2RW7A):				
30		First 1000 kWh per month	0.07474	0.07474	0.08104
31		Over 1000 kWh per month	0.06527	0.06527	0.07077
32					
33	Other Use - For all kWh - WINTER - Rate Code (2RO1A):		0.09862	0.09862	0.10693
34					
35	Separately Metered Space Heat - Rate Code (2RS2A; 2RS3A; 2RW7A):				
36		For all kWh - SUMMER	0.10751	0.10751	0.11657
37		For all kWh - WINTER	0.06524	0.06524	0.07074
38					
39	**Time Of Day (Frozen)** - Rate Code (2TE1A):				
40		Customer Charge	20.00	20.00	21.69
41		On-Peak - SUMMER	0.17621	0.17621	0.19106
42		Off-Peak - SUMMER	0.07370	0.07370	0.07991
43		For all kWh - WINTER	0.07705	0.07705	0.08354
44	Factor RESA Gen		0.000%	0.000%	8.425%
45	Factor RESA Gen - Winter		0.000%	0.000%	8.423%
46	Factor RESC Gen+ S/H (1 M)		0.000%	0.000%	8.428%
47	Factor RESC Gen+ S/H (1 M) - Winter		0.000%	0.000%	8.429%
48	Factor RESD Gen + S/H (2M)		0.000%	0.000%	8.429%
49	Factor RESD Gen + S/H (2M) - Winter		0.000%	0.000%	8.430%
50	Factor RTOD		0.000%	0.000%	8.428%
51	Factor ROU		0.000%	0.000%	8.428%
52	Overall Change (*)		0.000%	0.000%	8.426%
53	Winter Price Below Summer (SUM-WIN)/SUM		20.937%	20.937%	20.939%
54					
55		Revenue[1]	$295,423,479	$295,423,479	$320,316,196
56		Change in Revenue			$24,892,717
57					
58		Proposed change per Revenue Summary			$24,896,281
59					($3,564)
60		Manual Bill	$0	$0	$0
61		Overall Revenue	$295,423,479	$295,423,479	$320,316,196
62					
63	[1] Values do not include any Manual Bill non-blocked charges or revenue associated.				

Kansas City Power & Light - Kansas

Small General Service

Case No.	**18-KCPE-xxx-RTS**
Status:	**Ordered**

15.36%

INPUT FOR MODEL

	Current Rates	Rates w/ Increase	Proposed Rates
JURIS INCREASE (%)		**0.000%**	**18.211%**
A: CUSTOMER CHARGE			
Metered Service - Rate Code (All less 2SUSH):			
0-24 KW	18.36	18.36	21.70
25 KW or above	47.99	47.99	56.73
Unmetered Service - Rate Code (2SUSH):	7.88	7.88	9.32
Separately Metered Space Heat - Rate Code (2SGHE; 2SGHH):	2.17	2.17	2.57
B: FACILITIES CHARGE			
SECONDARY - Rate Code (2SGSE; 2SGSH; 2SUSE; 2SUSH; 2SGHE; 2SGHH; 2SGAH; 2SGAE):			
First 25 KW	-	-	-
All KW over 25 KW	2.828	2.828	3.343
PRIMARY - Rate Code (2SGSF; 2SGSG; 2SGAF; 2SGAG):			
First 26 KW	-	-	-
All KW over 26 KW	2.393	2.393	2.829
C: ENERGY CHARGE			
SECONDARY-SUMMER - Rate Code (2SGSE; 2SGSH; 2SUSE; 2SUSH;2SGAE; 2SGAH; 2SGHE; 2SGHH):			
First 180 Hours Use per month	0.14429	0.14429	0.14429
Next 180 Hours Use per month	0.06337	0.06337	0.06337
Over 360 Hours Use per month	0.05662	0.05662	0.05662
SECONDARY-WINTER - Rate Code (2SGSE; 2SGSH; 2SUSE; 2SUSH):			
First 180 Hours Use per month	0.11484	0.11484	0.11484
Next 180 Hours Use per month	0.05413	0.05413	0.05413
Over 360 Hours Use per month	0.04268	0.04268	0.04268
PRIMARY-SUMMER - Rate Code (2SGSF; 2SGSG; 2SGAF; 2SGAG):			
First 180 Hours Use per month	0.14067	0.14067	0.14067
Next 180 Hours Use per month	0.06162	0.06162	0.06162
Over 360 Hours Use per month	0.05514	0.05514	0.05514
PRIMARY-WINTER - Rate Code (2SGSF; 2SGSG):			
First 180 Hours Use per month	0.11191	0.11191	0.11191
Next 180 Hours Use per month	0.05279	0.05279	0.05279
Over 360 Hours Use per month	0.04150	0.04150	0.04150
SECONDARY-WINTER - Space Heating - Rate Code (2SGAE; 2SGAH):			
First 180 Hours Use per month	0.07809	0.07809	0.07809
Next 180 Hours Use per month	0.04739	0.04739	0.04739
Over 360 Hours Use per month	0.04140	0.04140	0.04140
PRIMARY-WINTER - Space Heating - Rate Code (2SGAF; 2SGAG):			
First 180 Hours Use per month	0.07621	0.07621	0.07621
Next 180 Hours Use per month	0.04617	0.04617	0.04617
Over 360 Hours Use per month	0.04011	0.04011	0.04011
D: SEPARATELY METERED S/H-WINTER			
SECONDARY - Rate Code (2SGHE; 2SGHH):	0.04140	0.04140	0.04894
E: REACTIVE DEMAND ADJUSTMENT - Rate Code (All):	0.665	0.665	0.786
SGS Secondary	0.000%	0.000%	2.706%
SGS Primary	0.000%	0.000%	3.007%
SGS Overall Change (*)	0.000%	0.000%	2.706%
SGA Secondary	0.000%	0.000%	3.437%
SGA Primary	0.000%	0.000%	5.198%
SGA Winter Energy Overall Change	0.000%	0.000%	0.000%
SGA Overall Change (*)	0.000%	0.000%	3.579%
SGS Secondary - Space Heat	0.000%	0.000%	6.346%
SGS Space Heat Overall Change (*)	0.000%	0.000%	6.346%
Winter Price Below Summer (SUM-WIN)/SUM	16.309%	16.309%	15.432%
Overall Change	0.000%	0.000%	2.844%
Revenue[1]	$43,987,406	$43,987,406	$45,238,593
Change in Revenue			$1,251,187
Proposed change per Revenue Summary			$1,254,807
			($3,620)
Manual Bill	$0	$0	$0
Overall Revenue	$43,987,406	$43,987,406	$45,238,593

[1] Values do not include any Manual Bill non-blocked charges or revenue associated.

	A	B	C	D	E
1	**Kansas City Power & Light - Kansas**				
2	**Medium General Service**				
3					
4	**Case No:**	**18-KCPE-xxx-RTS**			
5	**Status:**	**Ordered**			
6					
7		INPUT FOR MODEL			
8			**Current Rates**	**Rates w/ Rate Design**	**Proposed Rates**
9		**JURIS INCREASE (%)**		**0.000%**	**10.32576%**
10					
11					
12	**A: CUSTOMER CHARGE**				
13		All rate groups - Rate Code (All):	49.57	49.57	54.69
14		Separately Metered Space Heat - Rate Code (2MGHE; 2MGHH):	2.32	2.32	2.56
15					
16	**B: FACILITIES CHARGE**				
17		SECONDARY - Rate Code (2MGSE; 2MGSH; 2MGAE; 2MGAH; 2MGHE; 2MGHH):	2.893	2.893	3.192
18		PRIMARY - Rate Code (2MGSF; 2MGSG; 2MGAF; 2MGAG):	2.449	2.449	2.702
19					
20	**C: DEMAND CHARGE**				
21		SECONDARY - SUMMER - Rate Code (2MGSE; 2MGSH; 2MGAE; 2MGAH; 2MGHE; 2MGHH):	4.048	4.048	4.466
22		SECONDARY - WINTER - Rate Code (2MGSE; 2MGSH; 2MGHE; 2MGHH):	2.051	2.051	2.263
23		PRIMARY - SUMMER - Rate Code (2MGSF; 2MGSG; 2MGAF; 2MGAG):	3.961	3.961	4.370
24		PRIMARY - WINTER - Rate Code (2MGSF; 2MGSG):	2.011	2.011	2.219
25		SPACE HEATING - SECONDARY - WINTER - Rate Code (2MGAE; 2MGAH):	2.813	2.813	3.103
26		SPACE HEATING - PRIMARY - WINTER - Rate Code (2MGAF; 2MGAG):	2.752	2.752	3.036
27					
28	**D: ENERGY CHARGE**				
29		SECONDARY - SUMMER - Rate Code (2MGSE; 2MGSH; 2MGAE; 2MGAH; 2MGHE; 2MGHH):			
30		First 180 Hours Use per month	0.09178	0.09178	0.09178
31		Next 180 Hours Use per month	0.05754	0.05754	0.05754
32		Over 360 Hours Use per month	0.05822	0.05822	0.05822
33					
34		SECONDARY - WINTER - Rate Code (2MGSE; 2MGSH):			
35		First 180 Hours Use per month	0.08218	0.08218	0.08218
36		Next 180 Hours Use per month	0.04613	0.04613	0.04613
37		Over 360 Hours Use per month	0.03882	0.03882	0.03882
38					
39		PRIMARY - SUMMER - Rate Code (2MGSF; 2MGSG; 2MGAF; 2MGAG):			
40		First 180 Hours Use per month	0.08949	0.08949	0.08949
41		Next 180 Hours Use per month	0.05574	0.05574	0.05574
42		Over 360 Hours Use per month	0.05327	0.05327	0.05327
43					
44		PRIMARY - WINTER - Rate Code (2MGSF; 2MGSG):			
45		First 180 Hours Use per month	0.08031	0.08031	0.08031
46		Next 180 Hours Use per month	0.04505	0.04505	0.04505
47		Over 360 Hours Use per month	0.03547	0.03547	0.03547
48					
49		SPACE HEATING - SECONDARY - WINTER - Rate Code (2MGAE; 2MGAH):			
50		First 180 Hours Use per month	0.04846	0.04846	0.04846
51		Next 180 Hours Use per month	0.02935	0.02935	0.02935
52		Over 360 Hours Use per month	0.02551	0.02551	0.02551
53					
54		SPACE HEATING - PRIMARY - WINTER - Rate Code (2MGAF; 2MGAG):			
55		First 180 Hours Use per month	0.04712	0.04712	0.04712
56		Next 180 Hours Use per month	0.02853	0.02853	0.02853
57		Over 360 Hours Use per month	0.02481	0.02481	0.02481
58					
59	**E: SEPARATELY METERED S/H-WINTER**				
60		SECONDARY - Rate Code (2MGHE; 2MGHH):	0.02551	0.02551	0.02814
61					
62	**F: REACTIVE DEMAND ADJUSTMENT** - Rate Code (All):		0.670	0.670	0.739
63	MGS Secondary		0.000%	0.000%	2.755%
64	MGS Primary		0.000%	0.000%	2.220%
65	MGS Overall Change (*)		0.000%	0.000%	2.707%
66	MGA Secondary		0.000%	0.000%	3.414%
67	MGA Primary		0.000%	0.000%	5.001%
68	MGA Winter Energy Overall Change		0.000%	0.000%	0.000%
69	MGA Overall Change (*)		0.000%	0.000%	3.470%
70	MGS Secondary - Space Heat		0.000%	0.000%	4.549%
71	Winter Price Below Summer (SUM-WIN)/SUM		17.122%	17.122%	16.875%
72	Overall Change		0.000%	0.000%	2.850%
73					
74		Revenue[1]	$69,300,751	$69,300,751	$71,275,816
75		Change in Revenue			$1,975,065
76					
77		Proposed change per Revenue Summary			$1,976,020
78					($955)
79		Manual Bill	$0	$0	$0
80		Overall Revenue	$69,300,751	$69,300,751	$71,275,816
81					
82	[1] Values do not include any Manual Bill non-blocked charges or revenue associated.				

	A	B	C	D	E
1	**Kansas City Power & Light - Kansas**				
2	**Large General Service**				
3					
4	**Docket No.**	**18-KCPE-xxx-RTS**			
5	**Status:**	**Ordered**			
6					6.48%
7		INPUT FOR MODEL			
8			**Current Rates**	**Rates w/Rate Design**	**Proposed Rates**
9		**JURISDICTIONAL INCREASE (%)**		**0.000%**	**9.328%**
10					
11	**A: CUSTOMER CHARGE**				
12		For Transmission/Substation - Rate Code (2LGSU; 2LGSV; 2LGSW; 2LGSZ):	763.86	763.86	835.11
13		0 - 999 KW - Rate Code (2LGSE; 2LGSH; 2LGSF; LGSG; 2LGAE; 2LGAH; 2LGAF; 2LGAG; 2LGHE; 2LGHH):	104.62	104.62	114.38
14		1000 KW or above - Rate Code (2LGSE; 2LGSH; 2LGSF; LGSG; 2LGAE; 2LGAH; 2LGAF; 2LGAG; 2LGHE; 2LGHH)	715.54	715.54	782.28
15		Separately Metered Space Heat - Rate Code (2LGHE; 2LGHH):	2.31	2.31	2.53
16					
17	**B: FACILITIES CHARGE**				
18		SECONDARY - Rate Code (2LGSE; 2LGSH; 2LGAE; 2LGAH; 2LGHE; 2LGHH):	3.030	3.030	3.313
19		PRIMARY - Rate Code (2LGSF; LGSG; 2LGAF; 2LGAG):	2.544	2.544	2.781
20		SUBSTATION - Rate Code (2LGSU; 2LGSV):	0.807	0.807	0.882
21		TRANSMISSION - Rate Code (2LGSW; 2LGSZ):	-	-	-
22					
23	**C: DEMAND CHARGE**				
24		SECONDARY - SUMMER - Rate Code (2LGSE; 2LGSH; 2LGAE; 2LGAH; 2LGHE; 2LGHH):	6.536	6.536	7.146
25		SECONDARY - WINTER - Rate Code (2LGSE; 2LGSH; 2LGHE; 2LGHH):	3.318	3.318	3.627
26		PRIMARY - SUMMER - Rate Code (2LGSF; LGSG; 2LGAF; 2LGAG):	6.414	6.414	7.012
27		PRIMARY - WINTER - Rate Code (2LGSF; LGSG):	3.245	3.245	3.548
28		SPACE HEATING - SECONDARY - WINTER - Rate Code (2LGAE; 2LGAH):	3.020	3.020	3.302
29		SPACE HEATING - PRIMARY - WINTER - Rate Code (2LGAF; 2LGAG):	2.964	2.964	3.240
30					
31		SUBSTATION - SUMMER - Rate Code (2LGSU; 2LGSV):			
32		First 2520 KW	11.113	11.113	12.150
33		Next 2520 KW	10.379	10.379	11.347
34		Next 2520 KW	7.644	7.644	8.357
35		All KW over 7560 KW	5.579	5.579	6.099
36					
37		SUBSTATION - WINTER - Rate Code (2LGSU; 2LGSV):			
38		First 2520 KW	7.553	7.553	8.258
39		Next 2520 KW	6.886	6.886	7.528
40		Next 2520 KW	5.337	5.337	5.835
41		All KW over 7560 KW	4.107	4.107	4.490
42					
43		TRANSMISSION - SUMMER - Rate Code (2LGSW; 2LGSZ):			
44		First 2541 KW	11.013	11.013	12.040
45		Next 2541 KW	10.287	10.287	11.247
46		Next 2541 KW	7.600	7.600	8.309
47		All KW over 7623 KW	5.548	5.548	6.066
48					
49		TRANSMISSION - WINTER - Rate Code (2LGSW; 2LGSZ):			
50		First 2541 KW	7.486	7.486	8.184
51		Next 2541 KW	6.825	6.825	7.462
52		Next 2541 KW	5.307	5.307	5.802
53		All KW over 7623 KW	4.084	4.084	4.465
54					
55	**D: ENERGY CHARGE**				
56		SECONDARY - SUMMER - Rate Code (2LGSE; 2LGSH; 2LGAE; 2LGAH; 2LGHE; 2LGHH):			
57		First 180 Hours Use per month	0.06879	0.06879	0.06879
58		Next 180 Hours Use per month	0.04916	0.04916	0.04916
59		Over 360 Hours Use per month	0.02811	0.02811	0.02811
60					
61		SECONDARY - WINTER - Rate Code (2LGSE; 2LGSH; 2LGHE; 2LGHH):			
62		First 180 Hours Use per month	0.06895	0.06895	0.06895
63		Next 180 Hours Use per month	0.04189	0.04189	0.04189
64		Over 360 Hours Use per month	0.03130	0.03130	0.03130
65					
66		PRIMARY - SUMMER - Rate Code (2LGSF; LGSG; 2LGAF; 2LGAG):			
67		First 180 Hours Use per month	0.06682	0.06682	0.06682
68		Next 180 Hours Use per month	0.04769	0.04769	0.04769
69		Over 360 Hours Use per month	0.02705	0.02705	0.02705
70					
71		PRIMARY - WINTER - Rate Code (2LGSF; LGSG):			
72		First 180 Hours Use per month	0.06681	0.06681	0.06681
73		Next 180 Hours Use per month	0.04092	0.04092	0.04092
74		Over 360 Hours Use per month	0.03052	0.03052	0.03052
75					

	A	B	C	D	E
76		SPACE HEATING - SECONDARY - WINTER - Rate Code (2LGAE; 2LGAH):			
77		First 180 Hours Use per month	0.04812	0.04812	0.04812
78		Next 180 Hours Use per month	0.03002	0.03002	0.03002
79		Over 360 Hours Use per month	0.02465	0.02465	0.02465
80					
81		SPACE HEATING - PRIMARY - WINTER - Rate Code (2LGAF; 2LGAG):			
82		First 180 Hours Use per month	0.04684	0.04684	0.04684
83		Next 180 Hours Use per month	0.02903	0.02903	0.02903
84		Over 360 Hours Use per month	0.02389	0.02389	0.02389
85					
86		SUBSTATION - SUMMER - Rate Code (2LGSU; 2LGSV):			
87		First 180 Hours Use per month	0.05717	0.05717	0.05717
88		Next 180 Hours Use per month	0.03465	0.03465	0.03465
89		Over 360 Hours Use per month	0.02005	0.02005	0.02005
90					
91		SUBSTATION - WINTER - Rate Code (2LGSU; 2LGSV):			
92		First 180 Hours Use per month	0.05347	0.05347	0.05347
93		Next 180 Hours Use per month	0.03776	0.03776	0.03776
94		Over 360 Hours Use per month	0.02728	0.02728	0.02728
95					
96		TRANSMISSION - SUMMER - Rate Code (2LGSW; 2LGSZ):			
97		First 180 Hours Use per month	0.05645	0.05645	0.05645
98		Next 180 Hours Use per month	0.03422	0.03422	0.03422
99		Over 360 Hours Use per month	0.01961	0.01961	0.01961
100					
101		TRANSMISSION - WINTER - Rate Code (2LGSW; 2LGSZ):			
102		First 180 Hours Use per month	0.05291	0.05291	0.05291
103		Next 180 Hours Use per month	0.03733	0.03733	0.03733
104		Over 360 Hours Use per month	0.02683	0.02683	0.02683
105					
106	**E: SEPARATELY METERED S/H-WINTER**				
107		SECONDARY - Rate Code (2LGHE; 2LGHH):	0.02465	0.02465	0.02695
108					
109	**F: REACTIVE DEMAND ADJUSTMENT** - Rate Code (All):		0.688	0.688	0.752
110	LGS Secondary		0.000%	0.000%	2.792%
111	LGS Primary		0.000%	0.000%	2.448%
112	LGS Overall Change (*)		0.000%	0.000%	2.737%
113	LGA Secondary		0.000%	0.000%	3.132%
114	LGA Primary		0.000%	0.000%	2.423%
115	LGA Winter Energy Overall Change		0.000%	0.000%	0.000%
116	LGA Overall Change (*)		0.000%	0.000%	3.096%
117	LGS Substation Voltage		0.000%	0.000%	2.900%
118	LGS Transmission Voltage		0.000%	0.000%	2.316%
119	LGS Overall Change (*)		0.000%	0.000%	2.440%
120	Winter Price Below Summer (SUM-WIN)/SUM		16.407%	16.407%	16.628%
121	Overall Change			0.000%	2.878%
122					
123		Revenue[1]	$164,058,031	$164,058,031	$168,780,331
124		Change in Revenue			$4,722,299
125					
126		Proposed change per Revenue Summary			$4,724,088
127					($1,789)
128					
129		Manual Bills	$0	$0	$0
130		Overall Revenue	$164,058,031	$164,058,031	$168,780,331
131					
132	[1] Values do not include any Manual Bill non-blocked charges or revenue associated.				

Kansas City Power and Light Kansas Proposed Non-Rate Tariff Revisions
Docket No: 18-KCPE-XXX-RTS

Tariff Book	Name of Schedule	Tariff Schedule	Tariff Sheet No.	Proposed Change	Support
Rates	Table of Contents	TOC-1	(1-2)	Move Energy Efficiency, Demand Response, & End Use Section to Sheet 2.	The Company is proposing to move this section to make room for proposals being made by the Company throughout its Rate Book.
			2	Change heading to remove, "Customer Programs," and replace with, "End Use."	To maintain consistency of rate books across jurisdictions.
			(2-3)	Add Schedule CCN.	To include the Company's already implemented Public Electric Vehicle Charging Station Service within its Table of Contents.
				Add Schedule RHER	The Company is proposing an original Residential Home Energy Report Pilot Program as a schedule within its Rate Book.
				Add Schedule RSTP	The Company is proposing an original Residential Smart Thermostat Pilot Program as a schedule within its Rate Book.
				Remove Economic Relief Pilot Program	The Company is proposing to correct an error found identifying the Economic Relief Pilot Program as a schedule within its Rate Book.
			(1-3)	Adjust total number of sheets in header to 4.	The Company is proposing an original Sheet No. 4 to be included within Schedule TOC-1.
			(1,3)	Added Schedule SSR.	The Company is proposing to add an original Standby Service Rider to its Rate Book.
				Added Schedule RTOU	The Company is proposing to add an original Residential Time of Use Pilot to its Rate Book.
				Added Schedule RD	The Company is proposing to an original Residential Demand Pilot to its Rate Book.
				Added Schedule RDTOU	The Company is proposing to add an original Residential Demand plus Time of Use Pilot to its Rate Book.
				Added Schedule RDG	The Company is proposing to add an original Demand Service for Residential Distributed Generation to its Rate Book.
				Added Schedule LGS-2	The Company is proposing to add an original Large General Service Off-Peak Rider to its Rate Book.
				Added Schedule RER.	The Company is proposing to add an original Renewable Energy Rider to its Rate Book.
				Added Schedule SSP.	The Company is proposing to add an original Solar Subscription Pilot Rider to its Rate Book.
			4	Create an original Sheet 4	An original Sheet No. 4 within Schedule TOC-1 is necessary to make room for various proposals being made by the Company throughout its Rate Book.
			(1,4)	Mark Private Unmetered Protective Lighting Service as Frozen	The Company is proposing to freeze this rate schedule and implement an original Private Unmetered LED Lighting Service for new customers.
				Remove Schedule RTP	The Company is proposing to eliminate its Real-Time Pricing schedule from its Rate Book.
				Remove Schedule RTP-Plus	The Company is proposing to eliminate its Real-Time Pricing Plus schedule from its Rate Book.
				Add Schedule PL	The Company is proposing to add an original Private Unmetered LED Lighting Service to its Rate Book.
				Remove Schedule CL	The Company is proposing to eliminate its Commercial Street Lighting from its rate book.
	Energy Cost Adjustment	2	(1-2)	Add language to account for operational changes.	The Company is proposing to add language related to the Renewable Energy Rider tariff that will isolate the Renewable Energy Rider's PPA costs to that rider versus the Schedule ECA.
	Energy Efficiency Rider	15	(1-2)	Adjust language to support Schedules RHER and RSTP.	The Company is proposing to adjust the language of its Energy Efficiency Rider to support the implementation of its proposed Schedules RHER and RSTP.
	Residential Time of Day Service (Frozen)	16	2	Adjust language to state, "Customer Charge," under the Minimum Monthly Bill section.	The Company is proposing to adjust the language identifying the Minimum Monthly Bill under Schedule RTOD to maintain consistency throughout the Residential Class.
	Residential Time of Use Service Pilot (New)	17	(1-2)	Create original Schedule RTOU	The Company is proposing to add an original Residential Time of Use Service Pilot to its Rate Book based on findings from rate design study conducted within the Company's Missouri jurisdiction.
	Residential Demand Service Pilot (New)	18	(1-3)	Create original Schedule RD	The Company is proposing to add an original Residential Demand Service Pilot to its Rate Book based on findings from rate design study conducted within the Company's Missouri jurisdiction.
	Residential Demand Service plus Time of Use Pilot (New)	19	(1-3)	Create original Schedule RDTOU	The Company is proposing to add an original Residential Demand Service plus Time of Use Pilot to its Rate Book based on findings from rate design study conducted within the Company's Missouri jurisdiction.
	Public Electric Vehicle Charging Station Service	20	(1-3)	Adjust language to reflect the Schedule CCN in the Company's other jurisdictions	The Company is proposing to adjust the language and formatting within its current Schedule CCN to reflect the Schedule CCN within the Company's other jurisdictions.
	Residential Home Energy Report Pilot Program	21	1	Create original Schedule RHER	The Company is proposing to add an original Residential Home Energy Report Pilot Program. This is an educational program that will serve to support customers participating in rate pilots.
	Residential Smart Thermostat Pilot Program	22	1	Create original Schedule RSTP	The Company is proposing to add an original Residential Smart Thermostat Pilot Program. This is as an educational program that will serve to support customers participating in rate pilots.
	Demand Service for Residential Distributed Generation (New)	23	(1-3)	Create original Schedule RDG	The Company is proposing to add an original Demand Service for Residential Distributed Generation tariff based on the Commission's findings in Docket No. 16-GIME-403-GIE that investigated rate design for customers with distributed generation.
	Large General Service Off-Peak Rider (New)	34	(1-2)	Create original Schedule LGS-2.	The Company is proposing to add an original Large General Service Off-Peak Rider to its Rate Book in an effort to grant approved LGS customers the ability to consume levels of demand during established Off-Peak hours that exceeds their measured demand during established On-Peak hours, and not be billed for the excess.
	Standby Service Rider (New)	64	(1-6)	Create original Schedule SSR.	The Company is proposing to add a Standby Service Rider in an effort to maintain the consistency of rate books across jurisdictions.
	Renewable Energy Rider (New)	65	(1-8)	Create original Schedule RER.	The Company is proposing to add a Renewable Energy Rider in an effort to provide non-residential customers a voluntary opportunity to purchase clean energy from renewable energy sources contracted by the Company.
	Solar Subscription Rider (New)	66	(1-5)	Create original Schedule SSP.	The Company is proposing to add a Solar Subscription Pilot Rider to its rate to give residential and non-residential customers an opportunity to subscribe to solar resource electricity.
	Municipal Ornamental Street Lighting Service	69	1	(1) Add LED Rate Code 2MOLL; and (2) Add Section Nos. 1.3 and 1.4.	The Company is proposing to add an LED option to its Municipal Ornamental Street Lighting Service to provide customers with an opportunity to use other light types than High Pressure Sodium.
	Off-Peak Lighting Service	70	1	(1) Adjust the language to re-define the availability of Schedule LS to include both metered and unmetered customers; and (2) Add new rate code KSOLL for billing of metered customers	The Company is proposing to adjust the language of its Off-Peak Lighting Service to allow both greater flexibility to both Metered and Unmetered customers, and increased coordination of service across jurisdictions.
	Private Unmetered Protective Lighting Service	71	(1-4)	Mark sheets as frozen.	The Company is proposing to freeze its Private Unmetered Protective Lighting Service and propose an original Private Unmetered LED Lighting Service to be made available to future customers.

(1) Commercial Street Lighting; and (2) Private Unmetered LED Lighting Service (New)	72	(1-4)	(1) Cancel Schedule CL; (2) Adjust total number of sheets in header to 4; and (3) create Schedule PL with original Sheet Nos. (3-4)	The Company is proposing to eliminate its Commercial Street Lighting service as there are currently no customers contracted and it has not been available to any new customers since September 30, 1985. Furthermore, the Company is proposing to add an original Private Unmetered LED Lighting Service for both residential and non-residential custmers in an effort to replace its current Private Area Lighting rate schedule.
Municipal Street Lighting Service	73	(1-7)	(1) Freeze all existing rate codes; (2) Add LED options section; (3) Adjust order of Section No. 3 to maintain chronological order of Schedule ML and adjust successive Section Nos; (4) Eliminate current Section No. 7; (5) Create original Sheet Nos. (6-7); and (6) Adjust total number of sheets in header to 7	Within its Municipal Street Lighting Service, the Company is proposing to freeze all current rate codes under and provide LED options to any future customers.
Municipal Traffic Contol Signal Service	74	(2-10)	1) Adjust the order of each installation and supplemental equipment to maintain proper order.	The Company is proposing to renumber each installation and supplemental equipment to maintain chronological order.
Thermal Storage Rider	77	1	Delete reference to the Real-Time Pricing and Real-Time Pricing Plus Programs.	The Company is proposing to eliminate both its Real-Time Pricing and Real-Time Pricing Plus programs from its Rate Book.
Real-Time Pricing (Schedule RTP)	79	(1-5)	Cancel Tariff	The Company is proposing to eliminate its Real-Time Pricing Program schedule as there are no customers served on these frozen rates. Additionally, the administrative effort to continue to offer this unused product, and maintain the tariff, is overly burdensome.
Real-Time Pricing (Schedule RTP-Plus)	80	(1-5)	Cancel Tariff	The Company is proposing to eliminate its Real-Time Pricing Plus Program schedule as there are no customers served on these frozen rates. Additionally, the administrative effort to continue to offer this unused product, and maintain the tariff, is overly burdensome.

Rules and Regulations	Definitions	1.07	7	Add language instructing the reader that typical meter configurations depicting the point of delivery can be found within the Company's Construction Standards.	The Company is proposing to adjust the language of Rule 1.11, that defines Point of Delivery, based on recommendations from the Kansas Corporation Commission Staff in Docket No. 17-KCPE-433-COM.
	Appendix A: Agreements	1.84 1.85	84 85	(1) Remove Application for Private Area Lighting Service as it is no longer applicable; (2) Add language identifying that the Company shall enter in an agreement with a customer as needed to any request for service; and (3) Cancel Sheet 1.85.	The Company is proposing to remove the Application for Private Area Lighting Service and the language on Sheet 1.85 under Rule 3 of the Agreements section within Appendix A since the Company's proposal to freeze Schedule AL shall make it no longer available to any new customers. Furthermore, in an effort to maintain consistency across jurisdictions, the Company is proposing to add language to Sheet 1.84 stating that the Company may enter into an agreement with a customer as needed to complete any requests for service.

Kansas City Power & Light **Kansas Jurisdiction** **18-KCPE-xxx-RTS Rate Design Summary**			
Jurisdictional Retail Revenue (From Rev Model Sch 9-adjusted for ECA in R20)		$577,897,754	
Requested Revenue Increase (From Rev Model Sch 1)		$33,332,316	
Total to be applied to rates		$32,948,941	5.70%

Residential Average Bill Calculation **(1366 kWh per Summer month, 833 kWh per winter month)** **(without ECA, EER, PTS, and TDC)**			
Current Annual Bill		$1,308.52	
Annual Bill at Proposed Rate		$1,418.72	
Annual Increase	$	110.20	
Monthly Increase	$	9.18	8.42%
Daily Increase	$	0.30	

Small General Service Average Bill Calculation **(1442 kWh per Summer month, 1156 kWh per winter month)** **(without ECA, EER, PTS, and TDC))**			
Current Annual Bill		$2,115.00	
Annual Bill at Proposed Rate		$2,155.08	
Annual Increase	$	40.08	
Monthly Increase	$	3.34	1.90%
Daily Increase	$	0.11	

**Average demands adjusted to align more closely with actual billing determinant averages.*

KCP&L - Kansas Jurisdiction Class REVENUE SUMMARY - For Direct filing - 18-KCPE-xxx-RTS

(A)		(B)	(C)	(D)	(E)	(F)	(G)	(H) = B-(C+D+E+F)	I = (H-G)	J = H*(%) 5.70%		
KANSAS RATE GROUP	**Weather Normalized CG kWh**	**% Weighting**	**Revenue from Existing Rates (Including ECA, PTR, EER, TDC)**	**ECA Rider/Adjustments**	**PTR Rider/Adjustments**	**EER Rider/Adjustments**	**TDC Rider/Adjustments**	**EDR credits****	**Revenue from Existing Rates less ECA, PTR, EER, TDC adjustments**	**Revenue from Existing Rates grossed up to reflect EDR credits**	**Requested Increase- from Rev Model excluding EDR gross-up (Equal increase)**	**Requested Increase- from Rev Model excluding EDR gross-up (Rev Shifts)**	**Proposed Revenue**
LARGE GEN SVC TOTAL	2,366,184,952	37%	$ 224,201,859	$ 48,101,719	$ 1,555,139	$ -	$ 12,142,299	$ (1,655,330)	$ 162,402,701	$ 164,058,031	$ 9,259,418	$ 4,629,709	$ 167,032,410
MEDIUM GEN SVC TOTAL	758,322,278	12%	$ 88,678,022	$ 15,488,071	$ 492,926	$ -	$ 3,411,115	$ (14,841)	$ 69,285,911	$ 69,300,751	$ 3,950,348	$ 1,975,174	$ 71,261,085
SMALL GEN SVC TOTAL	379,290,426	6%	$ 53,994,886	$ 7,682,467	$ 244,488	$ -	$ 2,109,735	$ (29,209)	$ 43,958,196	$ 43,987,406	$ 2,506,284	$ 1,253,142	$ 45,211,338
RESIDENTIAL TOTAL	2,847,796,936	45%	$ 371,077,479	$ 55,323,818	$ 1,741,016	$ -	$ 18,589,167	$ -	$ 295,423,478	$ 295,423,478	$ 16,843,621	$ 24,896,281	$ 320,319,759
MO Metered TOTALS	**6,351,594,592**	**100.00%**	**$ 737,952,246**	**$ 126,596,075**	**$ 4,033,568**	**$ -**	**$ 36,252,316**	**$ (1,699,380)**	**$ 571,070,286**	**$ 572,769,666**	**$ 32,559,672**	**$ 32,754,306**	**$ 603,824,592**
MO Lighting TOTAL:	54,013,182		$ 8,174,161	$ 1,091,267	$ 36,823	$ -	$ 218,604	$ -	$ 6,827,468	$ 6,827,468	$ 389,269	$ 194,635	$ 7,022,102
MO TOTAL	**6,405,607,774**		**$ 746,126,407**	**$ 127,687,342**	**$ 4,070,391**	**$ -**	**$ 36,470,920**	**$ (1,699,380)**	**$ 577,897,754**	**$ 579,597,134**	**$ 32,948,941**	**$ 32,948,941**	**$ 610,846,694**

** Includes Mpower Credits and net metering credits.

RR Reqmt (Request Inc) 4/5/2018	$ 32,948,941
EDR Gross-up	$ 96,890

	Equal Increase	**Increase w/ Shifts**
LGS	5.70%	2.85%
MGS	5.70%	2.85%
SGS	5.70%	2.85%
RES	5.70%	8.43%
Lighting	5.70%	2.85%