

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

OCT 26 2012

by
State Corporation Commission
of Kansas

In the Matter of the Notice and Application)
of Westar Energy, Inc. and Kansas Gas and) Docket No. 13-WSEE-144-TAR
Electric Company for a Limited Waiver of a)
Billing Standard Related to Registered)
Meter Readings.)

CURB's Response to Staff's Report and Recommendation

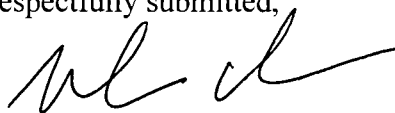
The Citizens' Utility Ratepayer Board (CURB) files the following response to *Staff's Report and Recommendation* filed on October 16, 2012 in the above-captioned docket:

CURB supports the proposal of Westar Energy, Inc and Kansas Gas and Electric Company (Westar) presented in its application, filed on August 17, 2012, for a limited waiver of the billing standards of the Kansas Corporation Commission (KCC). CURB recognizes that adoption of advanced electronic metering devices eliminates the need for monthly meter readings that are necessary to determine monthly electricity usage measured by non-electronic meters. So long as utilities are required to provide customers accurate usage data for the billing period, regardless of how it is obtained, CURB is satisfied. It is CURB's opinion that Staff's proposed language for Sheet 11, Section 4.05.01 of Westar's General Terms and Conditions is adequate to ensure that usage is determined accurately for every billing period, whether or not the usage is determined by reading a non-electronic meter or measured by an electronic meter, and whether or not the customer is subject to a time-of-use tariff.

However, Staff's recommendation that the Commission allow the waiver "when such

data is [sic] not readily available” is a bit too broad. CURB recommends that the Commission specify in its order that the waiver of the requirement of including “beginning-and-end” meter reading data on customer bills is applicable only to billings provided to customers with electronic meters capable of providing accurate usage data for the billing period without such meter readings.

Respectfully submitted,



David Springe #15619
Niki Christopher #19311
C. Steven Rarrick #13127
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
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(785) 271-3116 Fax

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF SHAWNEE) SS:

I, Niki Christopher, of lawful age, being first duly sworn upon her oath states:

That she is an attorney for the above named petitioner; that she has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.



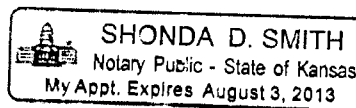
Niki Christopher

SUBSCRIBED AND SWORN to before me this 26th day of October, 2012.



Notary Public

My Commission expires: 08-03-2013.



CERTIFICATE OF SERVICE

13-WSEE-144-TAR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 26th day of October, 2012, to the following:

SAM FEATHER, LEGAL STAFF
KANSAS CORPORATION COMMISSION
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Hand Delivered

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Shonda Smith
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