BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Joint Application of)
Westar Energy, Inc. and Kansas Gas and)
Electric Company for Approval of their) Docket No. 14-WSEE-428-ACA
Annual Energy Cost Correction)
Adjustment Factor)

JOINT APPLICATION

COME NOW Westar Energy, Inc. (Westar North) and Kansas Gas and Electric Company (Westar South) (collectively referred to as "Westar") and file this Joint Application for approval of their Annual Correction Adjustment (ACA) factors under their Retail Energy Cost Adjustment (RECA) clauses. In support of this Joint Application, Westar states:

- 1. Westar is a corporation duly incorporated under the laws of the State of Kansas and is engaged, among other matters, in the retail electric public utility business, as defined by K.S.A. 66-104, in legally designated areas within the state of Kansas. Westar holds certificates of convenience and authority issued by this Commission authorizing it to engage in such utility business.
- 2. The testimony of Rebecca Fowler and Jerry D. Kroeker is attached to this Joint Application. Ms. Fowler explains the calculations and assumptions underlying the requested ACA factor. She also describes the calculation of asset-based margins following the procedures agreed upon in the Stipulation and Agreement in Docket No. 08-WSEE-1041-RTS and the Stipulation and Agreement in Docket No. 09-WSEE-925-RTS. Mr. Kroeker addresses the assumptions and methodologies relied upon in making the 2014 energy cost forecast, including Westar's planning for fuel supply and generation resources and the supply side resources Westar currently has available to meet the needs of its customers.

- 3. In Docket No. 09-WSEE-925-RTS, the Commission approved a Stipulation and Agreement that result in the consolidation of the majority of Westar North's and Westar South's rates, including the RECAs and all other riders and surcharges. Thus, the ACA proposed in this Application was calculated on a consolidated basis and will be applied to all customers in Westar's combined service territory.
- 4. There are several exhibits attached to Ms. Fowler's testimony and incorporated herein by reference. Exhibit A summarizes the actual energy costs incurred and all components of the RECA incurred by Westar during the ACA period beginning January 1, 2013, through December 31, 2013. Exhibit A also shows the over/under recovery of energy costs and the calculation of the ACA factors for the period January 1, 2013, through December 31, 2013, to be reflected in the Westar RECA commencing with the first billing cycle in April 2014. Because there was an under-recovery of costs, Westar's ACA is 0.0303 cents/kWh.
- 5. Exhibit B has the same information contained in Exhibit A by month for the 2013 ACA period. Exhibit B includes a summary of the asset-based margins credited to customers through the RECA.
- 6. As part of the Stipulation and Agreement in Docket No. 08-WSEE-1041-RTS, Westar agreed to begin forecasting and estimating asset-based off-system margins on a calendar quarter basis. Exhibit C calculates the asset-based margin factor for Westar the first quarter of 2014. This factor will remain constant for the billing months of January through March 2014.
- 7. Exhibit D contains the forecasted RECA factor for each month of calendar year 2014. This forecast combines the results of the over/under recovery of energy costs, the forward-looking projection of asset-based margins, and the non-binding estimate of 2014 fuel

and energy costs to arrive at monthly estimated RECA factors for Westar on a consolidated

basis.

8. Some information contained in the exhibits to Ms. Fowler's testimony has not

been publicly disclosed and, if disclosed, could place Westar at a significant competitive

disadvantage in negotiating future fuel contracts. Therefore, a redacted version of Ms. Fowler's

exhibits is also enclosed. Accordingly, Westar requests Exhibits A through D that are marked

confidential be designated and treated as confidential in accordance with applicable Commission

and statutory standards and practices.

9. Westar submits that the energy costs recovered through the RECA mechanism for

the period January 1, 2013, through December 31, 2013, were reasonable and complied in all

respects with applicable standards established by the Commission in Docket No. 106,850-U (75-

GIMC-009-GIG) and Docket No. 05-WSEE-981-RTS.

WHEREFORE, Westar requests that an ACA factor of 0.0303 cents/kWh for the period

April 2014 through March 2015 be approved by the Commission.

Respectfully submitted,

Cathryn J. Dinges, #20848

Corporate Counsel

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Topeka, KS 66612

(785) 575-8344; Telephone

(785) 575-8136; Fax

ATTORNEY FOR

WESTAR ENERGY, INC. AND

KANSAS GAS AND ELECTRIC COMPANY

VERIFICATION

STATE OF KANSAS)	
)	ss:
COUNTY OF SHAWNEE)	

Cathryn J. Dinges, being duly sworn upon her oath deposes and says that she is one of the attorneys for Westar Energy, Inc. and Kansas Gas and Electric Company; that she is familiar with the foregoing Joint Application; and that the statements therein are true and correct to the best of her knowledge and belief.

Cathryn Venges
Cathryn J. Dinges

SUBSCRIBED AND SWORN to before me this Qth day of March, 2014.

Notary Public Pups.

My Appointment Expires:

OF THE STATE OF KANSAS

DIRECT TESTIMONY

OF

JERRY D. KROEKER WESTAR ENERGY, INC.

DOCKET NO. 14-WSEE 428 ACA

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

- 2 A. Jerry D. Kroeker, 818 South Kansas Avenue, Topeka, Kansas 66612.
- 3 Q. BY WHOM AND IN WHAT CAPACITY ARE YOU EMPLOYED?
- 4 A. Westar Energy, Inc. (Westar). I am the Executive Director, Fossil Fuels.
- Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND
 BUSINESS EXPERIENCE.
- A. I graduated from Wichita State University in 1974 with a B.S. degree in economics. I began my electric utility career in 1974 with Kansas Gas and Electric Company. I have held several positions at Kansas Gas and Electric Company and Westar Energy Inc, including positions in accounting, regulatory, risk management, and bulk power marketing, before becoming Director, Coal Fuel Services in 2006 and during 2012, Executive Director, Fossil Fuels.
 - Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

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- A. I will discuss the supply side resource (fuel supply and generation)

 planning process used by Westar. I will also discuss the supply side

 resources currently available to meet our customers' needs.
- 4 Q. HOW DOES WESTAR PLAN TO ACQUIRE THE FUEL AND
 5 PURCHASED POWER USED TO SUPPLY ELECTRICITY TO ITS
 6 CUSTOMERS?
- A. Westar's fuel and purchased power acquisition planning is performed using a three-step resource planning process. The steps in this process are the development of our:
 - Long-term Supply Side Plan (LSP),

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- An annual and five-year business plan, and
- Updates to the annual and five-year business plans as conditions
 change.
- 14 Q. PLEASE DESCRIBE THE FIRST STEP OF THE RESOURCE
 15 PLANNING PROCESS.
- A. The first step is to develop a long-term strategy to serve our customers at the lowest reasonable cost consistent with reliable service. This planning process is used to meet the needs of our "native load," which is defined as our retail and wholesale requirements customers. Our resource planning process develops a list of future resources to serve Westar's total projected customer demand and energy usage at a reasonable cost. The resource plan selected by Westar includes base load, intermediate,

peaking, and intermittent resources. These resources use a mix of fuels including uranium, coal, natural gas, and renewable energy resources.

Q. HOW DOES THE SECOND STEP OF THE PLANNING PROCESS WORK?

A. In addition to long-range planning, Westar conducts annual financial and operational plans, which are used to develop a five-year business forecast. This planning process includes load forecasting, detailed generation unit modeling, O&M and capital budget planning, and revenue forecasting. The generation unit modeling developed in this phase of the planning process is used as the primary source of information for the development of the fuel and purchased power procurement plan.

Q. ARE THE ANNUAL AND FIVE-YEAR BUSINESS PLANS ADJUSTED TO REFLECT CHANGES IN THE BUSINESS ENVIRONMENT?

A. Yes. The annual and five-year business plans are refined as needed to take into account changes that have occurred since the plans were initially developed. Westar takes into account changes in such things as number of customers, state of the economy, fuel prices, purchased power prices, rail transportation delays, and coal availability. Westar adjusts its fuel procurement plans as refinements are made to the near-term forecasts.

Q. PLEASE DESCRIBE THE MAKEUP OF WESTAR'S SUPPLY-SIDE RESOURCES.

A. Table 1 below shows Westar's supply-side resources for supplying all our retail customers and wholesale obligations as of December 2013.

Table 1 – Westar's Generating Resources as of December 31, 2013

	Capacity Net	Actual Net Generation	Energy Cost 2013	Average	Fuel
Unit	MW	MWh	(\$000)**	Cost/MWh	Type
Wolf Creek*	547	3,369,101	26,483	\$7.86	Nuclear
Jeffrey*	1,983	12,282,906	243,509	\$19.83	Coal
LaCygne*	711	3,675,341	84,185	\$22.91	Coal
Lawrence	534	3,609,416	69,421	\$19.23	Coal/Gas
Tecumseh	197	1,109,752	21,842	\$19.68	Coal/Gas
Emporia	646	292,027	18,059	\$61.84	Gas
Gordon Evans	808	612,365	32,451	\$52.99	Gas/Oil
Hutchinson	392	20,178	1,780	\$88.19	Gas/Oil
Murray Gill	268	118,164	6,837	\$57.86	Gas
Spring Creek	269	7,435	529	\$71.15	Gas
State Line*	201	735,210	23,138	\$31.47	Gas
Wind Energy**	149	426,919	0.000	\$0.00	Wind
Purchases ***	N/A	2,348,891	137,204	\$58.41	Unknown
Total	6,705	28,607,705	665,439	\$23.26	

^{*} Values listed are for Westar's share only.

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As indicated in Table 1, the nuclear powered unit (Wolf Creek) provided 11.8 percent of Westar's overall energy requirements during the 2013 calendar year with the associated energy cost comprising 4.0 percent of the overall energy cost. Wolf Creek had a refueling outage during 2013. The coal fired units (Jeffrey, La Cygne, Lawrence and Tecumseh)

^{**} Wind Energy Capacity Net MW values are nameplate ratings (Westar owned): 99 MW Central Plains and 50 MW Flat Ridge.

^{***} Wind Energy from PPAs is included in Purchases: 50 MW Flat Ridge, 96 MW Merid Way, Ironwood 167.9 MW and Post Rock 201 MW. Purchases are recorded in account 5550000. Note that purchases from Stateline are reflected on a separate line.

⁺⁺Energy costs shown here are recorded in accounts 501/518/547/5550000.

provided 72.3 percent of Westar's overall energy requirements with the associated energy cost comprising 63.0 percent of the overall energy cost. Natural gas fired units (Emporia, Gordon Evans, Hutchinson, Murray Gill, Spring Creek and State Line) provided 6.2 percent of Westar's overall energy requirements with the associated energy cost comprising 12.4 percent of the overall energy cost. Purchased power provided 8.2 percent of Westar's overall energy requirements with the associated cost comprising 20.6 percent of the overall energy cost. The average cost of fuel for 2013 was 16.3 percent higher than 2012 due primarily to increased prices for natural gas and the resulting increased cost of purchased power. Finally, intermittent wind resources owned by Westar provided 1.5 percent of Westar's overall energy requirements.

Q. HOW DID NATURAL GAS AND PURCHASED POWER PRICES FOR 2013 COMPARE WITH SIMILAR PRICES DURING 2012?

A. The average cost for natural gas generation increased from \$33.29 per MWh in 2012 to \$46.37 per MWh in 2013 for an increase of \$13.08 per MWh or 39.3 percent. The average cost for purchased power energy increased from \$23.20 per MWh during 2012 to \$58.41 per MWh in 2013, an increase of 151.8 percent.

Q. WHAT STEPS DID WESTAR TAKE TO MINIMIZE THE IMPACT OF THESE COSTS ON YOUR CUSTOMERS?

A. Westar took advantage of our diverse generation fleet and the diversity of fuel sources that serve our generators and we were able to reduce natural

1	gas	generation	by	20.2	percent	in	2013	VS.	2012	and	reduced	our
2	purc	hases of pov	wer	by 57.	.44 perce	nt i	n 2013	3 vs.	2012.			

Q. DID WESTAR TAKE ANY OTHER STEPS TO FURTHER MINIMIZE THE COST OF FUEL TO YOUR CUSTOMERS?

A. Yes, Westar Energy's fleet average cost of coal decreased in 2013 compared to 2012 from \$20.59/MWh to \$20.26 per MWh for a decrease of 1.6 percent. Westar increased our coal generation from 18,690,690 MWh in 2012 to 20,677,415 MWh in 2013. This is an increase in our coal generation of 1,986,725 MWh or approximately 10.6 percent in 2013 versus 2012. Westar was able to accomplish this by maintaining a diverse generation fleet with a variety of generation fuel supply resources. This enables us to minimize cost increases to our customers and take advantage of the price movements of various fuels and purchased power to minimize the cost of providing reliable energy to our customers.

Q. HOW DOES THIS RESOURCE MAKEUP COMPARE TO PREVIOUS YEARS?

A. Westar had a similar mix of resources for 2013 as for 2012. The Westar total 2013 actual generation and purchases of 28,607,705 MWh was 2,171,869 MWh less than the total 2012 actual generation and purchases of 30,779,574 MWh.

EXISTING SUPPLY-SIDE RESOURCES

Q. PLEASE DESCRIBE WESTAR'S SUPPLY-SIDE RESOURCES IN GREATER DETAIL.

We group our resources into four main categories; base load, intermediate, peaking and intermittent (renewable). Base load facilities are those that operate day in and day out, except for periods of maintenance. Intermediate facilities typically operate for 8 to 16 hours per day 4 to 6 months per year and may run continuously for several days or weeks during peak periods. Peaking facilities typically operate for 2 to 12 hours per day 6 to 8 weeks per year and would only run continuously for a day or more under emergency conditions. Intermittent (renewable) resources generate whenever the fuel source (e.g., wind) is available

Q. PLEASE DESCRIBE WESTAR'S BASE LOAD FACILITIES.

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A. Westar owns either all or a significant portion of five facilities that would be classified as base load facilities. These facilities are Wolf Creek, Jeffrey, La Cygne, Lawrence, and Tecumseh Energy Centers. I will describe each in detail.

Wolf Creek. Westar has a 47% ownership interest (547 MW) in the 1,164 MW single unit nuclear-fueled generation station. Wolf Creek is managed and operated by the Wolf Creek Nuclear Operating Company (WCNOC). Westar and the other owners have various employees who act as board and committee members for WCNOC. Wolf Creek was placed into commercial operation in 1985. Wolf Creek operates on an 18-month refueling cycle and had a refueling outage during 2013. Wolf Creek is the lowest incremental dispatch cost unit in Westar's dispatchable fleet. Westar's 47% share of Wolf Creek's 2013 output was 3,369,101 MWh.

Jeffrey Energy Center. Westar has an 84% ownership interest (1,810 MW) and is the operator of the 2,155 MW three-unit coal fueled Jeffrey Energy Center. Westar also controls an additional 8% (172 MW) of the plant under a lease. That capacity is sold to the Mid-Kansas Electric Company, LLC through January 3, 2019. The three Jeffrey units were placed into commercial operation in 1978, 1980, and 1983. These units were designed to burn low sulfur coal from mines in the Powder River Basin (PRB). Westar's 92% share of Jeffrey Energy Center's 2013 output was 12,282,906 MWh.

La Cygne Station. Westar owns or controls 50 percent of the 1,422 MW two-unit coal fired La Cygne facility. Kansas City Power & Light Company (KCPL) owns the other 50 percent of La Cygne and is the operator of the facility. Westar's share of La Cygne's 2013 output was 3,675,341 MWh.

Lawrence Energy Center. Westar owns and operates all three coal units located at the 534 MW Lawrence facility. These coal units were placed in commercial operation in 1954, 1960, and 1971. These units have the ability to burn a variety of types and blends of western coal depending on fuel availability, fuel cost, and transportation availability. The combined Lawrence units produced 3,609,416 MWh in 2013.

Tecumseh Energy Center. Westar owns and operates two coal units at the 197 MW Tecumseh facility. The coal units were placed in commercial operation in 1957 and 1962. The coal units have a generating

capacity of approximately 70 MW and 127 MW, respectively. They have the ability to burn a variety of types and blends of western coal depending on fuel availability, fuel costs, and transportation availability. The combined Tecumseh coal units produced 1,109,752 MWh in 2013.

Q. PLEASE DESCRIBE WESTAR'S INTERMEDIATE AND PEAKING FACILITIES.

A.

Westar owns seven facilities that are considered intermediate and/or peaking units and has purchase power agreements for both intermediate and peaking units. The facilities owned by Westar are Emporia, Gordon Evans, Hutchinson, Murray Gill and Spring Creek Energy Centers. I will describe each in detail. We also have purchase power agreements for an intermediate facility at the State Line Combined Cycle Facility, operated by The Empire District Electric Company, and several peaking facilities with various municipalities.

Emporia Energy Center. Westar owns and operates four natural gas fired aero-derivative combustion turbines and three natural gas fired peaking combustion turbines at the 646 MW Emporia Energy Center. Units 1 through 5 were placed in service in 2008 and units 6 & 7 were placed in service in 2009. The aero-derivative combustion turbines are used throughout the year and provide quick response to changes in system conditions. The remaining combustion turbines units are used primarily during the summer and winter on-peak hours but provide value throughout the year. These units produced 292,027 MWh during 2013.

Gordon Evans Energy Center. Westar owns and operates two intermediate natural gas fired steam units and three peaking natural gas turbines at the 808 MW Gordon Evans facility. The intermediate natural gas steam units have capacity ratings of 152 MW and 372 MW and were placed in service in 1961 and 1967 respectively. The natural gas fired combustion turbine units have capacity ratings of 68 MW, 66 MW, and 150 MW and were placed in service in 2000 and 2001. During emergency situations the combustion turbines have the ability to operate on #2 diesel fuel. These intermediate units produced 515,666 MWh in 2013. The peaking units produced 96,699 MWh in 2013.

Hutchinson Energy Center. Westar owns and operates one intermediate natural gas fired steam unit, three natural gas fired peaking combustion turbines, and one #2 diesel fuel only fired combustion turbine at the 392 MW Hutchinson facility. The intermediate natural gas fired steam unit with a capacity rating of 160 MW was placed in service in 1965. The combustion turbine peaking units have a capacity rating of 54 MW, 52 MW, 55 MW, and 71 MW and were placed in service in 1974, 1974, 1974, and 1975 respectively.

During emergency situations the combustion turbines have the ability to operate on #2 diesel fuel. The intermediate unit produced 19,939 MWh in 2013. The peaking units produced 239 MWh in 2013. The peaking units run primarily in response to emergency conditions within the Southwest Power Pool (SPP) for loss of members' generating unit(s).

Murray Gill Energy Center. Westar owns and operates four intermediate natural gas fired steam units at the 268 MW Murray Gill facility. The intermediate natural gas fired steam units have capacity ratings of 37 MW, 48 MW, 93 MW, and 90 MW and were placed in service in 1952, 1954, 1956, and 1959 respectively. These units produced 118,164 MWh in 2013.

Spring Creek Energy Center. Westar owns and operates four natural gas fired peaking combustion turbines at the 269 MW Spring Creek facility. These units were placed in service in 2001 and were purchased by Westar in 2007. These units operate primarily during the summer on-peak hours for high peak load days. They produced 7,435 MWh during 2013.

State Line Combined Cycle Facility. Westar's subsidiary, Westar Generating, Inc. (WGI), owns 40% of the intermediate combined cycle unit at the 502 MW State Line facility. WGI sells the entire output of its share of State Line to Westar under a cost-based FERC-approved rate. The State Line facility is a 2x1 facility consisting of two natural gas fired combustion turbines and one steam turbine. The facility has the ability to operate in 1x1 mode or 2x1 mode. Westar purchased 735,210 MWh from State Line in 2013.

Other resources. Westar also contracts for the output of various other resources through purchase power agreements. These agreements are with various municipals, landfill gas facilities, or wind power producers.

The generation from these facilities is included in the 2,348,891 MWh of purchases shown in Table 1 above.

Q. PLEASE DESCRIBE WESTAR'S INTERMITTENT FACILITIES.

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A. Westar owns Central Plains Wind Farm and 50% of Flat Ridge Wind
Farm. Both facilities began commercial operation early in 2009. These
two owned locations generated 426,919 MWh (1.5% of Westar's total
generation MWh) in 2013.

Q. DOES WESTAR USE ENERGY PRODUCED FROM FACILITIES OTHER THAN THOSE PREVIOUSLY DISCUSSED?

Yes. Westar actively participates in the wholesale market seeking energy purchases that are lower than our anticipated cost of production. A 24-hour desk is staffed, routinely contacting potential counterparties, comparing opportunities, and developing alternatives. Westar also takes into account generation and transmission constraints and costs when making a purchasing decision. Westar is a member of the SPP and is a network transmission service customer of SPP. We purchased 2,348,891 MWh in 2013, or 8.2% of our total energy requirements, from facilities owned by others. In addition to the energy produced by renewable resources, we purchase power to lower the fuel cost to serve our customers by purchasing energy that is less expensive than we can produce from our next incrementally priced facility, either owned or contracted.

1 Q. HOW ARE LONG-TERM COMMODITY REQUIREMENTS 2 DETERMINED?

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Westar utilizes Plexos, a chronological dispatch model developed by Energy Exemplar, LLC to develop a least-cost dispatch solution for serving our customers' forecasted needs. Westar inputs various parameters into Plexos such as a weather normalized load forecast, uranium prices, coal prices, commodity prices for energy, natural gas, #2 diesel fuel, wind power forecasts, generating plant efficiencies and outages, and many other characteristics that allows the model to create a forecasted solution for the study period. This model is flexible enough to run study periods of a few days to several years. For study periods that involve several months to years, the model creates a monthly output that shows the projected MWh generation and projected fuel usage for each generation unit and suggested wholesale transactions. We use this output to create our commodity transaction strategy and spread price risk across three general time periods. We define these time periods as long-term, mid-term and short-term, with the actual days, weeks, months or years depending on the commodity transacted.

Q. IS THE COMMODITY TRANSACTION STRATEGY THE SAME FOR ALL COMMODITIES ASSOCIATED WITH THE MODEL OUTPUT?

A. No. We take into consideration the variability of each commodity, which results in different strategies for each commodity. Wholesale electric energy and natural gas are fairly homogenous commodities. However,

our exposure to these products differs greatly and requires different strategies for each. Coal is not a fungible product, with minor variations in sodium, ash content, metals and other parameters potentially having an adverse impact on plant operations. There is not one parameter that is the key, but rather how the various characteristics of the coal interact during the combustion process. This interaction can and typically does vary with each unit boiler.

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Q. HOW DO YOU DEVELOP YOUR STRATEGY FOR WHOLESALE ENERGY TRANSACTIONS?

The time frame for incremental wholesale energy transactions consists of beyond the prompt calendar quarter, prompt month through prompt calendar quarter and the current month for the long, mid and short-term periods, respectively. We determine how much can be sold during each period and transact roughly one-third of the available quantities during each of the short, mid, and long term time frames. As market conditions move, load forecasts are revised, and as input commodity prices change, the resulting model output quantities will also change, making this a very dynamic process.

Q. PLEASE DESCRIBE HOW WESTAR ACQUIRES ITS NATURAL GAS REQUIREMENTS.

A. Westar's natural gas fired generation resources are located on the Southern Star Central Gas Pipeline (SSCGP), Kansas Gas Service intrastate pipeline (KGS), and ONEOK Gas Transportation, L.L.C., pipeline

(OGT). Westar currently has about 153,500 MMBtu/day firm production zone capacity and 86,500 MMBtu/day market zone capacity on SSCGP. We do not have firm transport on KGS or OGT. If Westar had to run all of its natural gas fired capacity at once, its Maximum Daily Quantity (MDQ) would be about 623,000 MMBtu/Day. If an emergency is declared, most of Westar's simple cycle gas turbines have the ability to operate on #2 diesel. Westar procures physical natural gas on both a long-term (monthly) basis and short-term basis (daily). Typically these physical purchases are from suppliers such as ONEOK Energy Services, Tenaska Gas Storage, Anadarko Energy Services, Enbridge Marketing, or Atmos Energy Marketing.

Q. HOW DOES WESTAR PROCURE THE NATURAL GAS NECESSARY TO MEET YOUR CUSTOMERS NEEDS?

A. Westar begins purchasing physical natural gas for our summer peak demand period in the late winter when prices begin dropping for deliveries in July and August and continues purchasing natural gas through May until we secured a block of natural gas equivalent to our base needs for the summer. This provides price diversity for customers.

Q. HOW DO YOU DEVELOP YOUR STRATEGY FOR COAL TRANSACTIONS?

A. We use a much longer time horizon for coal supply than we use for energy, gas, or other such homogenous commodities. The long, short, and mid-term periods are greater than five years, two to five years and

less than two years, respectively. Prior to entering into a supply contract for a coal source that is unproven in that specific power plant(s), the coal would need to be tested in the boiler(s) to ensure the coal will not have adverse impacts on the power plant's operations.

Q. PLEASE DESCRIBE THE CONTRACTUAL ARRANGEMENTS THAT PROVIDE COAL FOR YOUR FACILITIES.

Α.

Jeffrey Energy Center receives coal under a long-term agreement. This agreement has two components, the Tier I and the Tier II coal provisions. The price of both Tier I and II are adjusted quarterly based on several government indices in accordance with the formulas described in the contract. The price for Tier I was established in 1993 when the contract was renegotiated. The price for Tier II is adjusted every five years in accordance with the then current market price of coal and in accordance with the terms and procedures established in the contract. The Tier II coal price effective in 2013 was determined in October 2012 and is effective for calendar years 2013 through 2017. Approximately seven million tons was delivered under the Tier I component of the contract during 2013. Tons in excess of this amount are provided under the Tier II component.

Lawrence and Tecumseh Energy Center coal is provided under a mid-term length contract that provided 100% of the coal requirement for 2013. Coal contracts for these facilities are entered into based on an RFP process with the contract awarded to the lowest bidder meeting the coal

quality and quantity requirements for the two plants. All three Westar operated coal facilities burn low sulfur PRB coal produced in Wyoming.

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La Cygne is operated by KCPL and all of the coal requirements are procured by KCPL's fuel department. La Cygne I burns approximately 85-90% PRB low sulfur coal and 10-15% local coal. La Cygne II burns 100% PRB low sulfur coal.

Q. PLEASE DESCRIBE THE FREIGHT CONTRACTS GOVERNING THE DELIVERY OF COAL INTO WESTAR'S COAL FIRED FACILITIES.

Coal for Jeffrey Energy Center originates at the Eagle Butte Mine in Wyoming. From the mine, the coal is hauled by the BNSF Railway Company (BNSF) to Northport, Nebraska. There the coal is transferred to the Union Pacific Railway Company (UP) for final delivery to Jeffrey Energy Center. The pricing of this rail contract was established in 1993 and prices are adjusted quarterly based on the RCAF-U (Rail Cost Adjustment Factor – Unadjusted). This index is a composite of rail-related expenses including labor, fuel, depreciation, material and supplies and other expenses. It is calculated by the American Association of Railroads (AAR) and is approved by the Surface Transportation Board. The transportation contract for Jeffrey Energy Center expired December 31, 2013.

Coal for Lawrence Energy Center and Tecumseh Energy Center originates at the Black Thunder Mine in Wyoming on the BNSF and is delivered by the BNSF to the Lawrence Energy Center and Tecumseh

Energy Center. The BNSF transportation contract governing deliveries to Lawrence and Tecumseh is adjusted monthly to reflect the actual cost of diesel fuel used to support deliveries and quarterly to reflect the AAR all inclusive index less fuel. The transportation contract for Lawrence Energy Center and Tecumseh Energy Center also expired December 31, 2013.

Q. DOES WESTAR HAVE NEW CONTRACTS IN PLACE FOR 2014?

A. Yes. Westar has completed negotiations and signed new transportation contracts with both the BNSF Railway Company and the Union Pacific Railway Company for continued and uninterrupted coal transportation service effective January 1, 2014 to Jeffrey, Lawrence and Tecumseh Energy Centers.

Q. DO THE COAL FIRED FACILITIES MANAGED BY WESTAR HAVE COMPETITIVE OPTIONS FOR COAL DELIVERY?

- A. No. Coal for the Jeffrey Energy Center originates only on the BNSF and the Jeffrey Energy Center is served only by the UP so there is currently no other option for the rail delivery of coal into Jeffrey Energy Center.

 Lawrence Energy Center and Tecumseh Energy Center are served only by the BNSF. Retrofitting existing generating facilities to provide access to both railroads and thereby provide competitive access would be very expensive with uncertain results.
- Q. PLEASE DESCRIBE WESTAR'S FLEET OF RAILCARS USED TO
 DELIVER COAL.

A. During 2013, Westar had the ability to operate as many as fourteen train sets to serve our coal fired facilities. As many as nine train sets are available to serve Jeffrey Energy Center. Lawrence and Tecumseh Energy Centers are typically served by as many as five train sets. Jeffrey Energy Center train length is 123 car trains, and 135 car train sets serve Lawrence and Tecumseh Energy Centers.

Q. DID WESTAR MAKE ANY CHANGES TO ITS FLEET OF RAILCARS DURING 2013?

A. No. Westar has made no changes in the number of railcar sets we operate for our coal facilities during 2013. A contract for approximately 664 railcars was renewed with the original Lessor following an RFP process that ensured Westar captured the lowest lease rate for those railcars.

Q. HOW DOES WESTAR DETERMINE THE APPROPRIATE NUMBER OR RAIL CAR SETS TO RETAIN?

A. Westar closely monitors railroad performance and the movements of our train sets to ensure we have adequate train set capacity in service to deliver the coal requirements of our power plants. Westar determines the appropriate number of train sets necessary to serve our coal facilities based on railroad performance and any changes in railroad cycle times that include weather related interruptions, rail congestion, and demand for other railroad transportation services.

Q. DOES WESTAR LEASE ALL OF ITS TRAIN SETS?

- A. No, Westar both owns and leases railcars. For those leased railcars, there are several different leases with varying durations. This diversity enables us to adjust our fleet to match the delivery requirements given the economic conditions and railroad performance.
- 5 Q. THANK YOU.

OF THE STATE OF KANSAS

DIRECT TESTIMONY

OF

REBECCA A. FOWLER WESTAR ENERGY, INC.

DOCKET NO. 14-WSEE-<u>428</u>-ACA

- 1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
- 2 A. Rebecca A. Fowler, 818 South Kansas Avenue, Topeka, Kansas 66612.
- 3 Q. BY WHOM AND IN WHAT CAPACITY ARE YOU EMPLOYED?
- 4 A. Westar Energy, Inc. (Westar). I am a Regulatory Analyst for Retail Rates.
- 5 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND
- 6 **BUSINESS EXPERIENCE**.

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A. I graduated from Pittsburg State University with a Bachelor of Business

Administration with an accounting major. My utility experience began in

1990 when I was employed by Westar as an internal auditor.

Subsequently, I held positions as a staff accountant, and as the lead

accountant for financial reporting. I left the company in 1997 and resumed

employment with the company in 2011 as an internal auditor. I assumed

my current position as a regulatory analyst in July 2013. I am a Certified

Public Accountant, a Certified Management Accountant and a Certified

- 1 Internal Auditor. I am also a member of the American Institute of Public
- 2 Accountants and the Institute of Internal Auditors.

3 Q. PLEASE PROVIDE A GENERAL BACKGROUND OF THE FILING AND

- 4 WHY IT IS BEING MADE AT THIS TIME.
- A. On December 28, 2005, the Commission issued an order in Westar's rate proceeding, Docket No. 05-WSEE-981-RTS (981 Docket). The Commission approved implementation of a fuel clause for Westar's Kansas retail customers in the 981 Docket. The Retail Energy Cost
- 9 Adjustment (RECA) tariff requires Westar to "true-up" the projected energy
- 10 costs to actual energy costs annually.

11 Q. HAVE THERE BEEN MODIFICATIONS TO THE RECA FOLLOWING

12 **ITS IMPLEMENTATION IN THE 981 DOCKET?**

13 Α. Yes. First, in Docket No. 08-WSEE-1041-RTS (1041 Docket), Westar and 14 others proposed changes to the periodic RECA calculations. The 15 Commission approved the changes by adopting the Stipulation and Agreement that was executed by all of the parties. The changes to the 16 17 RECA include: a) quarterly RECA billing factor calculations rather than 18 monthly calculations; b) a comprehensive definition of fuel expense; c) a 19 modification to the calculation of asset-based off system margins; and d) 20 the inclusion of revenue received from our Renewable Energy Program 21 Rider and the sale of Renewable Energy Credits offset to purchased 22 power.

Next, in Docket No. 09-WSEE-925-RTS (925 Docket), the Commission approved a Stipulation and Agreement consolidating Westar North and Westar South rates. This consolidation also affected the calculation of RECA and other Riders and Surcharges as fully described in the Stipulation and Agreement filed in that docket. In summary, the RECA was calculated as a single system wide rate and applied to all customers in Westar's service territory, beginning with the February 2010 billing month. Additionally, the RECA was amended by incorporating a portion of wholesale non-fuel revenue in the Annual Cost Adjustment (ACA) calculation and recognizing that certain wholesale customers may share in off system sales margins.

In Docket No. 10-WSEE-541-TAR, the RECA tariff language was changed but the changes had no effect on the RECA calculation.

In Docket No. 12-WSEE-112-RTS (112 Docket), the Wholesale Revenue (WR) incorporated in the RECA was adjusted to reflect the change in base rates in the 112 Docket.

Lastly, in Docket No. 14-WSEE-208-TAR (208 Docket), the Commission approved changes to the RECA tariff including: a) changes to the RECA Factor calculation eliminating the Asset Based Margin Adjustment (ABMA) component and changing the Fuel Adjustment (FA) component to remove the projected cost to achieve asset-based sales $(ABSC_p)$; b) changes to the Projected Annual Correction Adjustment Factor $(ACAF_p)$ to remove the calculated actual cost to achieve asset-

based sales during the previous ACA year (ABSC_A); c)changes to the tariff in order to ensure that the definition of purchased power in the tariff would encompass anticipated expenses and revenues from the Southwest Power Pool (SPP) Integrated Marketplace as a result of Westar's participation in the operation of the Marketplace.

6 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS 7 PROCEEDING?

A. My testimony supports Westar's request for an order approving its combined ACA factor. I will explain the calculations and assumptions underlying the requested ACA factor. I will also describe the calculation of the asset-based margins factor to be included in Westar's RECA mechanism for the billing months of January, February and March 2014.

Jerry Kroeker will describe Westar's supply side resources, plant performance, and fuel procurement in his testimony.

15 Q. WHAT INFORMATION IS PROVIDED REGULARLY TO STAFF DURING 16 THE ACA YEAR?

17

18

19

20

21

22

Α.

Westar provides five items regularly to the Commission staff. They are: a) an annual non-binding forecast of RECA factors; b) actual gas purchases for the month prior to the current month on a monthly basis; c) a brief variance analysis of the current quarterly projected fuel expense compared to the non-binding forecast on a quarterly basis; and d) the current RECA estimate or billing factor. Additionally, the <u>Electric</u>

- 1 <u>Generating Statistics</u> known, as the "GADS 5-Year Stats Book," is 2 provided annually as a part of this filing as soon as the data is available.
- Q. ARE THERE ANY EXHIBITS FILED WITH WESTAR'S ACA
 4 APPLICATION PREPARED BY YOU OR PREPARED UNDER YOUR
- 5 **DIRECT SUPERVISION?**
- 6 A. Yes. There are four exhibits.
- 7 Q. PLEASE DESCRIBE THE EXHIBITS.
- 8 Exhibit A summarizes components of the RECA calculation incurred by Α. 9 Westar during the ACA period beginning January 1, 2013 through 10 December 31, 2013 used to derive the 2013 Annual Correction 11 Adjustment for Westar. Exhibit B illustrates the same information as 12 Exhibit A but shows the individual monthly components for the ACA period 13 Exhibit C is the calculation of the Asset Based Margin calculations. 14 Adjustment (ABMA) for the first calendar quarter to be used during the 15 billing months of January, February, and March 2014 according to the Order in the 1041 Docket. Exhibit D is Westar's non-binding forecast 16 17 estimate for 2014. According to the RECA tariff, the proposed ACA will 18 become effective April 1, 2014, and the ABMA will be effective from 19 January through March 2014. Those time periods are reflected in Exhibit 20 D. The data reflects the combination of the Westar North and Westar 21 South calculations in accordance with the Order in the 925 Docket.
- 22 Q. DID WESTAR HAVE AN (OVER)/UNDER RECOVERY BALANCE AT
 23 THE END OF DECEMBER 2013?

- 1 Α. Yes. Exhibit A, line 24 calculated the Under Recovery balance for the 2 year ended 2013 to be \$6,305,118. In summary, Westar incurred \$479,701,869 of fuel expense less certain offsets to provide electric 3 4 service to requirements customers. This amount is further reduced by 5 asset based margins of \$7,013,034. Westar recovered \$463,556,626 of 6 fuel expense during the same time period. The total 2013 fuel cost under 7 recovered balance plus the remaining balance from the previous ACA 8 year results in an ACA balance for the year of \$6,305,118 or an ACA 9 factor of 0.0303 cents/kWh.
- 10 Q. PLEASE BRIEFLY COMPARE THE NON-BINDING FORECAST OF
 11 WESTAR'S RECA ENERGY COSTS TO THE ACTUAL RECA ENERGY
 12 COSTS FOR THE 2013 ACA PERIOD.
- 13 A. The actual 2013 fuel and purchased power expense was \$21 million lower
 14 than the non binding estimate provided in December 2012 or
 15 approximately 4.3 percent lower than the estimate. Contributing to this
 16 decrease were favorable coal prices.
- 17 Q. DOES EXHIBIT B CONTAIN THE ASSET-BASED MARGINS EARNED
 18 BY WESTAR AND CREDITED TO KANSAS REQUIREMENTS
 19 CUSTOMERS?
- A. Yes. Exhibit B, line 58 displays the actual retail margins earned from asset-based system sales in the amount of \$7,013,034. Westar Energy's total earned margins for the ACA year ending December 31, 2013 were \$7,468,908. The difference between the two amounts represents the

wholesale customers' share of off-system sales margins per FERC Docket

ER09-1762-000. Exhibit C calculates the first quarter asset based margin

factor according to the Order in the 1041 Docket at 0.0509 cents/kWh for

Westar. The asset-based margins factor will remain constant for the

billing months of January through March 2014.

Q. PLEASE DESCRIBE THE FORECAST OF RECA FACTORS FOR THE UPCOMING CALENDAR YEAR OF 2014.

Exhibit D displays the forecasts of the RECA factor for each month and the four quarters of calendar year 2014. This forecast combines the results of the (over)/under recovery of energy costs and the non-binding estimate of 2014 fuel and energy costs to arrive at monthly estimated 2014 RECA factors. Exhibit D shows these factors ranging from a high of 2.4845 cents/kWh in June 2014 to a low of 1.9964 cents/kWh in January 2014 for Westar. Many factors can affect the estimated RECA charges.

Q. PLEASE GENERALLY DESCRIBE WESTAR'S ELECTRIC SYSTEM OPERATING CHARACTERISTICS.

17 A. Westar is a summer peaking utility. Table 1 below displays the actual
18 Westar peak demands by month for the year 2013 along with the MWh
19 sales made each month for retail customers only.

TABLE 1

Α.

Month	Peak-Mw	Percent of Peak Month	MWh Sales
January	3,115	63.5%	1,687,129
February	3,215	65.6%	1,488,618

March	2,996	61.1%	1,513,177
April	2,934	59.9%	1,337,287
May	3,378	68.9%	1,423,326
June	4,700	95.9%	1,626,529
July	4,902	100.0%	1,972,490
August	4,726	96.4%	1,823,834
September	4,511	92.0%	1,933,434
October	3,773	77.0%	1,582,722
November	2,961	60.4%	1,425,098
December	3,431	70.0%	1,716,674

As indicated, demands for the summer peak, (June through September) were within 8.0 percent of the system peak that occurred in July. Conversely, the peak demands in the eight-winter months were generally much lower than the peaks in the summer months. This affects fuel procurement and power plant operation. Westar must be prepared to meet high levels of demand for energy during the summer season. Jerry Kroeker describes Westar's supply side resources, plant performance, and fuel procurement in greater detail.

Q. ARE THE ACA ENERGY FACTORS DERIVED IN YOUR EXHIBITS REASONABLE FOR WESTAR'S KANSAS ELECTRIC CUSTOMERS?

11 A. Yes.

Q. THANK YOU.

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ANNUAL CORRECTION ADJUSTMENT

Annual Correction Factor for the ACA Ye	ear Ending	2013				
(a) Annual Correction Adjustment Factor	(b)	(c)	(d) Cost	. .	(e) kWh	(f) ¢/kWh
1 Actual Fuel Costs		F _A =	\$ -			
Fuel 2 Coal 3 Oil 4 Gas 5 Nuclear Fuel 6 Other Fuel Costs in Acct 501 and 547 7 Subtotal Fuel Costs 8 Uncollected Fuel for Previous Month 9 Uncollected Fuel for Current Month 10 Subtotal Uncollected Fuel 11 Total Fuel Costs	Actual Costs					
12 Actual Purchased Power Energy Costs		P _A =				
13 Actual Emission Cost/Revenue		E _A =				
14 Actual Cost to Achieve to Non - Requirement	ents Customers	NRCA _A =				
15 GFR Non-Fuel Delta		WR _A =				
16 Actual Cost to Achieve Asset-Based Sales		ABSC _A =				
17 Actual Fuel Revenues Collected for ACA Y	'ear	FAR _A =				
18 Actual ACA (Over) Remaining from the pre	vious ACA year	ACAB _A =				
19 Total (F _A +P _{A+} ABMA _A +E _A -NRCA _A -ABSC _A -	·FAR _A) ₊ ACAB _A) =		\$ 13,318,152	:		
20 kWhs delivered to all Requirement Custom	ers during the billing year			SA =	20,825,412,328	kWh
21 Projected Annual Correction Adjustment Fa ACAF _P = (F	actor / _A +P _A +ABMA _A +E _A -NRCA _A -ABSC _A -FA .01 x S _A	$R_A + /-WR_A) + ACAB_A =$		0.0640	¢/kWh	
22 ABM Earned During the Current Year			\$ (7,013,034)			
23 ABMA _A Factor		ABMA _A =		(0.0337)	¢/kWh	
24 FA-ABMA = (Over)/Under Recovery from	n 2013		\$ 6,305,118	:		
25 RECA ACA Proposed Factor from 2013		RECA _P =		0.0303	¢/kWh	

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Line #	January 2013	February 2013	March 2013	April 2013	May 2013	June 2013	July 2013	August 2013	September 2013	October 2013	November 2013	December 2013	YTD 2013
1 F _A Component of the RECA Tariff - Fuel Costs													
2 3 Coal 4 Oil 5 Gas 6 Nuclear 7 Other Fuel Costs 8 Subtotal for Fuel Costs													
10 Uncollected for Previous Month 11 Uncollected for Current Month 12 Subtotal for Uncollected Fuel													
13 14 Total Fuel Costs F _A Component (line 8 + line 12)													
15 16 P _A Component of the RECA Tariff - Purchase Power Costs													
17 18 Purchased Power 19 Equalization 20 Gain/Loss on Sales of Renewable Energy Credits 21 Renewable Energy Revenues													
22 23 Total Fuel Costs P _A Component (+ line 18 + line 19 + line 20 + line 21)													
24 25 E _A Component of the RECA Tariff - Emission Allowances 26	1												
27 Emission Allowances 28													
29 NRC _A Component of the RECA Tariff - Cost to Achieve Non-Requirements 30	1												
31 Cost to Achieve Non-Requirements 32													
ABSC _A Component of the RECA Tariff - Cost to Achieve Asset-Based Sales	1												
35 Cost to Achieve Asset-Based Sales 36													
37 WR Component Wholesale Non-fuel in 2007 Base Rates vs. Actual 38													
39 Demand Difference 40 VOM Difference 41													
42 Total Wholesale Non-Fuel Difference (line 39 + Line 40) 43													
Total F _A Fuel Adjustment Costs (line 14 + line 23 + line 27 - line 31 - line 35 - line 42)													
FAR _A Component of the RECA Tariff - Acutal Fuel Adjustment Revenues	1												
48 Wholesale Customer Fuel Revenues (FAC) 49 Wholesale Customer Fuel Revenues (GFR) 50 Retail Fuel Revenues													
51 52 Total F _A Fuel Adjustment Revenues (line 48 + line 49 + line 50)													
53 54 Net FA Component of the RECA Tariff (line 44 - line 52)													
55 56 ABM _A Component of the RECA Tariff - Asset-Based Margins													
57 58 Asset-Based Margins for Retail 59													
60 RECA (Over)/Under Recovery (line 54 + line 58)													
62 ACAB _A - Actual ACA Recovery from Prior Year													
64 S _A Component of the RECA Tariff - Company's Requirements Customers kWhs	1												
66 kWhs delivered to Company's Requirements Customers 67													
68 Energy Cost Factor 69 ABMA Factor 70 RECA Factor	2.1615 (0.0926) 2.0689	2.3803 (0.0351) 2.3452	2.5300 0.0177 2.5477	2.3862 (0.1181) 2.2681	2.6743 (0.0339) 2.6404	2.3082 0.0150 2.3232	2.1847 (0.0323) 2.1524	2.3663 (0.0160) 2.3503		2.2583 (0.0175) 2.2408	2.0817 (0.0611) 2.0206	2.1323 (0.0704) 2.0619	2.3034 (0.0337) 2.2697

WESTAR ENERGY, INC.
RETAIL ENERGY COST ADJUSTMENT REPORT
Energy Cost Adjustment Calculation

of January, February and March 2014

Docket No. 14-WSEE-___-ACA Exhbit C (RAF)

ASSET-BASED MARGIN ADJUSTMENT	KCC Tariff:	RECA
	Page 1 of 1	

Asset-Based Margins for Quarter Ended 03/31/14 **Asset-Based Margin Adjustment** Cost 1. Resultant Asset Based Margin Credit as Modeled ABSR - ABSC = for the year ended 12/31/2014 2. Quarters in the year. 3. Average Annual Asset-Based Margins for months of the first quarter 2014 4. Part of the ACAF correction $ABMB_A =$ 5. Subtotal \$2,592,645 6. Projected kWh delivered to all Westar Energy, Inc. $RS_P =$ Retail Customers with a fuel clause during first quarter. 5,097,143,000 kWh $(((ABSR-ABSC)-ABMB)/(.01*RS_P)) =$ 7. Asset-Based Margin Adjustment for the months 0.0509 ¢/kWh

NOTE:

THIS CALCULATION IS DONE EACH QUARTER. ASSET-BASED REVENUES AND SALES ARE BASED UPON THE 50TH PERCENTILE OF THE MARGIN PROBABILITY DISTRIBUTION FUNCTION.

Docket No. -___-ACA
Exhbit D (RAF)
RECA
Page 1 of 2

Estimated Energy Cost Forecasted for the Year (a) Fuel Adjustment Factor	2014 (b)	(c) WESTAR January	(e) WESTAR February	(f) WESTAR March	(g) WESTAR April	(h) WESTAR May	(i) WESTAR June	(j) WESTAR July	(k) WESTAR August	(I) WESTAR September	(m) WESTAR October	(n) WESTAR November	(o) WESTAR December
1 Projected Fuel Costs (line 2 + line 3 + line 4 + line 5)	F _P =												
Fuel 2 Coal 3 Oil 4 Gas 5 Nuclear													
6 Projected Purchased Power Energy Costs	P _P =												
7 Projected Emission Allowance Costs/Revenue	E _P =												
8 Projected Cost to Achieve Sales Non-Requirements Custo	omei NRCA _P =												
9 Projected Cost to Achieve Asset-Based Sales	ABSC _P =												
10 Totals (Lines 1+6+7-8-9)	$F_P+P_P+E_P-NRCA_P-ABSC_P =$												
11 Projected kWhs to be delivered to all Requirements Customers during billing month	$S_P = kWh$												
12 Projected Energy Cost Factor	$\frac{F_P + P_P + E_P - NRCA_P - ABSC_P}{0.01 \times S_P} =$												¢/kWh
13 Annual Correction Factor	ACAF _P =												¢/kWh
14 Fuel Adjustment Factor (line 12 + line 13)	FA =												¢/kWh
15 Asset-Based Margins Factor	ABMA =												¢/kWh
16 WESTAR RECA Factor (line 14 + line 15)	RECA =												¢/kWh

Note: Please note this non-binding estimate is on a monthly basis. A quarterly non-binding estimate is shown on the next tab.

Estimated Energy Cost Forecasted for the Year (a)	2014 (b)	(c)	(e)	(f)	(g)	
Fuel Adjustment Factor		First Quarter	Second Quarter	Third Quarter	Fourth Quarter	
1 Projected Fuel Costs (line 2 + line 3 + line 4 + line 5)	F _P =					
Fuel 2 Coal 3 Oil 4 Gas 5 Nuclear						
6 Projected Purchased Power Energy Costs	P _P =					
7 Projected Emission Allowance Costs/Revenue	E _P =					
8 Projected Cost to Achieve Sales Non-Requirements Custome	ers NRCA _P =					
9 Projected Cost to Achieve Asset-Based Sales	ABSC _P =					
10 Totals (Lines 1+6+7-8-9)	$F_P+P_{P+}E_P-NRCA_P-ABSC_P =$					
11 Projected kWhs to be delivered to all Requirements Customers during billing month	$S_P = kWh$					
12 Projected Energy Cost Factor	$\frac{F_P + P_P + E_P - NRCA_P - ABSC_P}{0.01 \times S_P} =$					¢/kWh
13 Annual Correction Factor	ACAF _P =					¢/kWh
14 Fuel Adjustment Factor (line 12 + line 13)	FA =					¢/kWh
15 Asset-Based Margins Factor	ABMA =					¢/kWh
16 WESTAR RECA Factor (line 14 + line 15)	RECA =					¢/kWh