

**BEFORE THE KANSAS CORPORATION COMMISSION
OF THE STATE OF KANSAS**

**In the Matter of the Application of Southern)
Pioneer Electric Company for Approval to) Docket No. 24-SPEE-415-TAR
Make Certain Revenue Neutral Changes in)
its Rate Design.)**

**CROSS-ANSWERING TESTIMONY & SCHEDULES OF
GLENN A. WATKINS**

**ON BEHALF OF
THE CITIZENS' UTILITY RATEPAYER BOARD**

APRIL 11, 2024

TABLE OF CONTENTS

	<u>PAGE</u>
I. INTRODUCTION & OVERVIEW	1
II. RESIDENTIAL SPACE HEATING	4
III. RESIDENTIAL NON-SPACE HEATING	8

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

2 A. My name is Glenn A. Watkins. My business address is 6377 Mattawan Trail,
3 Mechanicsville, Virginia 23116.

4

5 **Q. Have you previously filed testimony in this proceeding?**

6 A. Yes. I filed direct testimony in this proceeding on April 2, 2024.

7

8 **I. INTRODUCTION & OVERVIEW**

9 **Q. What is the purpose of your cross-answering testimony?**

10 A. The purpose of this testimony is to respond to certain findings and recommendations of
11 Staff witness Robert Glass and provide Residential bill impacts under Staff's and Southern
12 Pioneer's rate restructuring proposals.

13

14 **Q. Please provide a general overview of Dr. Glass' recommendations as it relates to
15 Residential and Small General Service rates.**

16 A. Similar to Southern Pioneer's proposal, Dr. Glass recommends a significant restructuring
17 of the rates impacting Residential and Small General Service customers. Specifically, Dr.
18 Glass accepts the Company's proposals that will impact individual customers in varying
19 degrees including:

- 20
- 21 • consolidating the currently separated Residential and Small General Service
22 rate schedules into a single rate schedule;
 - 23 • separating Residential and Small General Service customers between single-
24 phase and three-phase service;
 - 25
 - 26 • implementing a new mandatory non-coincident peak ("NCP") demand charge
27 for all Residential and Small General Service customers;

- 1 • increasing the current Residential fixed monthly customer charge; and,
2
3 • decreasing the current Small General Service fixed monthly customer charge
4 (for single-phase service).
5

6 In addition to these restructuring proposals that will impact individual customers in varying
7 degrees, Dr. Glass also recommends the consolidation of the Residential Space Heating
8 rate into the new single-phase service rate. In other words, Dr. Glass also recommends the
9 elimination of the discounted Residential Space Heating rate during the eight winter (non-
10 summer) months.

11
12 **Q. Do you disagree with any of Dr. Glass' recommendations as it relates to Residential**
13 **and Small General Service customers?**

14 A. Yes. For the reasons set forth in my direct testimony, I disagree with Dr. Glass'
15 recommendations to implement a mandatory demand charge for Residential and Small
16 General Service customers as well as his proposal to increase the Residential fixed monthly
17 customer charge. As will be discussed in detail later in this testimony, I also disagree with
18 Dr. Glass' recommendation to immediately eliminate the Residential Space Heating rate.

19
20 **Q. Will Staff's and the Company's recommendations have varying impacts on individual**
21 **customers' total electric bills?**

22 A. Yes. As a result of the proposed numerous structural changes noted above, individual
23 monthly and seasonal electric bills will change in varying degrees due to differences in
24 monthly and seasonal usage along with differences in monthly and seasonal load factors.

1 **Q. Have you calculated the Residential bill impacts on individual customer bills based**
2 **on Staff's and Southern Pioneer's proposed rate restructuring and rate designs?**

3 A. Yes. Although Dr. Glass and Mr. Macke indicate that their proposed rate restructuring and
4 rate designs are approximately revenue neutral for the entire Residential plus Small
5 General Service combined class on an annual basis, neither witness provides an analysis of
6 the seasonal impacts on individual bills. In this regard, Mr. Macke does show the
7 distribution of his proposed rate design changes on an average monthly basis over the entire
8 year. However, he does not differentiate the variability of impacts on monthly or seasonal
9 bills.

10
11 **Q. How did you calculate Residential bill impacts on individual customer bills based on**
12 **Staff's and Southern Pioneer's recommended rate designs?**

13 A. Southern Pioneer provided individual monthly customer usages and NCP demands in its
14 Confidential Exhibit 6. With regard to Space Heating Residential bills, the Company
15 provided data for 815 separate accounts. In conducting my analysis, I included only those
16 records with 12 months of usage data. This resulted in my evaluation of 369 records by
17 individual month.¹

18 With regard to non-Space Heating Residential bills, the Company provided data for
19 14,355 separate accounts. In conducting my analysis, I also included only those records in

¹ Mr. Macke's analysis included 541 records in which he combined those records with the same meter ID. I elected to exclude the combining of accounts with the same meter ID due to customer changes and potential lapses in monthly usage or partial monthly usage.

1 which there is a full 12 months of usage data. This resulted in my evaluation of 10,185
 2 records by individual month.²

3 For each data set, I calculated each customer’s bill on a monthly basis under current,
 4 Staff proposed, and Company proposed rates.

5
 6 **II. RESIDENTIAL SPACE HEATING**

7 **Q. Please provide a summary of your bill analysis for Residential Space Heating under**
 8 **Staff’s recommended rate design.**

9 A. Remembering that Staff recommends the immediate elimination of the Residential Space
 10 Heating rate such that this rate will be combined within the total single-phase Small
 11 General Service (Residential plus Small General Service) rate, the following tables provide
 12 a bill frequency analysis of customer bill impacts during the winter and summer rating
 13 periods under Staff’s proposed rate design:

14

TABLE 1A Staff Proposed Residential Space Heating Average Winter Bill Frequency Distribution	
Change In Electric Bill	Percent of Bills
-20% or more	0.00%
-15% to -20%	0.00%
-10% to -15%	0.00%
-5% to -10%	0.00%
-5% to 0%	4.34%
0% to +5%	19.51%
+5% to +10%	28.73%
+10% to +15%	23.85%
+15% to +20%	12.47%
+20% to +25%	6.23%
+25% or more	4.88%

15
16
17
18
19
20
21

² Mr. Macke’s analysis included 12,236 records in which he combined those records with the same meter ID. I elected to exclude the combining accounts with the same meter IDs due to customer changes and potential lapses in monthly usage or partial monthly usage.

1 As indicated above, almost half (47.43%) of Residential Space Heating customers would
 2 incur an increase of 10% or more in their winter space heating bills.³ At the same time,
 3 only a small percentage (4.34%) of Residential Space Heating customers would enjoy a
 4 reduction in their electric bills during the winter months (less than 5%).

5

6

7

8

9

10

11

12

13

TABLE 1B Staff Proposed Residential Space Heating Average Summer Bill Frequency Distribution	
Change In Electric Bill	Percent of Bills
-20% or more	0.00%
-15% to -20%	0.00%
-10% to -15%	0.27%
-5% to -10%	6.50%
-5% to 0%	23.04%
0% to +5%	26.02%
+5% to +10%	20.33%
+10% to +15%	11.65%
+15% to +20%	4.88%
+20% to +25%	4.07%
+25% or more	3.25%

14 With regard to the summer months, almost a quarter (23.85%) of Residential Space
 15 Heating customers would incur an increase of 10% or more. About 70% (69.38%) of
 16 Residential Space Heating customers would see little change in their electric bills in the
 17 summer months (between -5% and +10%) and about 7% (6.77%) of these customers would
 18 enjoy a reduction to their electric bills of 5% to 15%.

19 Staff's proposed bill impacts on Residential Space Heating customers is provided
 20 in my Schedule GAW-4 on a monthly basis.

³ 23.85% + 12.47% + 6.23% + 4.88% = 47.43%.

1 **Q. As a result of your analysis of Staff’s recommendation to eliminate the Residential**
 2 **Space Heating rate, did you also compare the impacts on Residential Space Heating**
 3 **customers under Southern Pioneer’s proposed rate design?**

4 A. Yes. Remembering that the Company proposes to maintain a separate Residential Space
 5 Heating rate, the following tables provide a frequency analysis of customer bill impacts
 6 during the winter and summer rating periods under the Company’s proposed Residential
 7 Space Heating rate design:

TABLE 2A Southern Pioneer Proposed Residential Space Heating Average Winter Bill Frequency Distribution	
Change In Electric Bill	Percent of Bills
-20% or more	8.13%
-15% to -20%	5.96%
-10% to -15%	3.79%
-5% to -10%	7.86%
-5% to 0%	12.20%
0% to +5%	13.55%
+5% to +10%	13.28%
+10% to +15%	15.72%
+15% to +20%	9.21%
+20% to +25%	5.15%
+25% or more	5.15%

17 As indicated above, more than a third (35.23%) of Residential Space Heating customers
 18 would incur an increase of 10% or more in their winter space heating bills under Southern
 19 Pioneer’s proposed rate design.⁴ At the same time, about a quarter (25.74%) of Residential
 20 Space Heating customers would enjoy a reduction in their electric bills during the winter
 21 months of at least 5%.

⁴ 15.72% + 9.21% + 5.15% + 5.15% = 35.23%.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

TABLE 2B Southern Pioneer Proposed Residential Space Heating Average Summer Bill Frequency Distribution	
Change In Electric Bill	Percent of Bills
-20% or more	0.00%
-15% to -20%	0.00%
-10% to -15%	0.27%
-5% to -10%	6.50%
-5% to 0%	23.04%
0% to +5%	26.02%
+5% to +10%	20.33%
+10% to +15%	11.65%
+15% to +20%	4.88%
+20% to +25%	4.07%
+25% or more	3.25%

With regard to the summer months, Staff’s recommended rates are the same as Southern Pioneer’s such that the same summer relationship exists. That is, almost a quarter (23.85%) of Residential Space Heating customers would incur an increase of 10% or more. About 70% (69.38%) of Residential Space Heating customers would see little change in their electric bills in the summer months (between -5% and +10%) and 6.77% of these customers would enjoy a reduction to their electric bills of 5% to 15%.

Southern Pioneer’s proposed bill impacts on Residential Space Heating customers is provided in my Schedule GAW-5 on a monthly basis.

Q. What are your findings and conclusions regarding the impact on Residential Space Heating customers under Staff’s and Southern Pioneer’s proposed rate designs?

A. Under both Staff’s and Southern Pioneer’s proposed rate restructuring and rate designs for Residential Space Heating customers, there are a large percentage of customers that would incur significant rate increases, particularly during the winter heating season. With regard

1 to the non-winter rate period, about one-quarter of the Residential Space Heating customers
2 would incur an increase of at least 10% while the remaining customers would see little
3 change in their summer bills. As a result of differences in usage and load profiles, these
4 significant impacts are primarily due to the Company's proposed mandatory demand
5 charges for Residential customers.

6
7 **Q. What is your opinion and recommendation concerning Staff's proposal to eliminate**
8 **the Residential Space Heating rate schedule?**

9 A. While there may be, and likely is, no cost justification for a discounted Residential Space
10 Heating rate during the winter months, the immediate elimination of this lower rate will
11 result in many customers seeing large increases in their winter electric bills. As a result,
12 this issue should be studied more thoroughly such that Dr. Glass' immediate elimination
13 of the winter discounted rate should not be approved in this case. Furthermore, and with
14 further study, a gradual elimination of the winter discounted rate for Residential Space
15 Heating may be appropriate. However, this should not be done in this case without further
16 study and analysis.

17
18 **III. RESIDENTIAL NON-SPACE HEATING**

19 **Q. Have you also calculated the Residential non-space heating bill impacts on individual**
20 **customer bills based on Staff's proposed rate restructuring and rate designs?**

21 A. Yes. The following tables provide a bill frequency analysis of Residential non-space
22 heating customer bill impacts during the winter and summer rating periods under Staff's
23 proposed rate design:

1
2
3
4
5
6
7
8
9

TABLE 3A Staff Proposed Residential (Non-Space Heating) Average Winter Bill Frequency Distribution	
Change In Electric Bill	Percent of Bills
-20% or more	0.00%
-15% to -20%	0.00%
-10% to -15%	0.53%
-5% to -10%	7.90%
-5% to 0%	20.44%
0% to +5%	26.67%
+5% to +10%	21.29%
+10% to +15%	12.60%
+15% to +20%	5.57%
+20% to +25%	2.54%
+25% or more	2.46%

10 As indicated above, about a quarter (23.17%) of Residential non-space heating customers
 11 would incur an increase of 10% or more in their winter bills.⁵ At the same time, about 8%
 12 (8.43%) of Residential non-space heating customers would enjoy a reduction of more than
 13 5% in their electric bills during the winter months. The remaining 68.40% of Residential
 14 non-space heating customers would see little or no change in their electric bills during the
 15 eight winter months.

⁵ 12.60% + 5.57% + 2.54% + 2.46% = 23.17%.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21

TABLE 3B Staff Proposed Residential (Non-Space Heating) Average Summer Bill Frequency Distribution	
Change In Electric Bill	Percent of Bills
-20% or more	0.00%
-15% to -20%	0.00%
-10% to -15%	1.33%
-5% to -10%	31.41%
-5% to 0%	40.31%
0% to +5%	15.83%
+5% to +10%	5.45%
+10% to +15%	2.81%
+15% to +20%	1.26%
+20% to +25%	0.61%
+25% or more	1.00%

With regard to the summer months, a small percentage (5.68%) of Residential non-space heating customers would incur an increase of 10% or more. About a third (32.73%) of Residential non-space heating customers would see a reduction of more than 5% in their electric bills in the summer months. About 60% (61.59%) of these customers would see no material change in their summer electric bills.

Staff’s proposed bill impacts on Residential non-space heating customers is provided in my Schedule GAW-6 on a monthly basis.

Q. Did you also compare the impacts on Residential non-space heating customers under Southern Pioneer’s proposed Residential rate design?

A. Yes. The following tables provide a frequency analysis of customer bill impacts during the winter and summer rating periods under the Company’s proposed rate design:

1
2
3
4
5
6
7
8
9

TABLE 4A Southern Pioneer Proposed Residential (Non-Space Heating) Average Winter Bill Frequency Distribution	
Change In Electric Bill	Percent of Bills
-20% or more	0.00%
-15% to -20%	0.00%
-10% to -15%	0.40%
-5% to -10%	6.45%
-5% to 0%	19.30%
0% to +5%	26.78%
+5% to +10%	22.07%
+10% to +15%	13.70%
+15% to +20%	5.99%
+20% to +25%	2.65%
+25% or more	2.65%

10 As indicated above, about a quarter (24.99%) of Residential non-space heating customers
11 would incur an increase of 10% or more in their winter bills.⁶ At the same time, only about
12 7% (6.85%) of Residential non-space heating customers would see a reduction of more
13 than 5% in their winter bills. The remaining 68.15% of customers would see little change
14 in their winter bills.

15
16
17
18
19
20
21
22

TABLE 4B Southern Pioneer Proposed Residential (Non-Space Heating) Average Summer Bill Frequency Distribution	
Change In Electric Bill	Percent of Bills
-20% or more	0.00%
-15% to -20%	0.00%
-10% to -15%	1.33%
-5% to -10%	31.41%
-5% to 0%	40.31%
0% to +5%	15.83%
+5% to +10%	5.45%
+10% to +15%	2.81%
+15% to +20%	1.26%
+20% to +25%	0.61%
+25% or more	1.00%

⁶ 13.70% + 5.99% + 2.65% + 2.65% = 24.99%.

1 With regard to the summer months, about 6% (5.68%) of Residential non-space
2 heating customers would incur an increase of 10% or more. About 60% (61.59%) of
3 Residential non-space heating customers would see little change in their electric bills in the
4 summer months while about a third (32.73%) of these customers would enjoy a reduction
5 to their electric bills of more than 5%.

6 Southern Pioneer's proposed bill impacts on Residential non-space heating
7 customers is provided in my Schedule GAW-7 on a monthly basis.

8
9 **Q. What are your findings and conclusions regarding the impact on Residential non-**
10 **space heating customers under Staff's and Southern Pioneer's proposed rate designs?**

11 A. Under both Staff's and Southern Pioneer's proposed rate restructuring and rate designs for
12 Residential non-space heating customers, there are a significant percentage (23% to 25%)
13 of customers that would incur rate increases of more than 10% during the winter season.
14 With regard to the non-winter rate period, a small percentage (5% to 6%) of customers
15 would incur an increase of at least 10%. As a result of differences in usage and load
16 profiles, these impacts are primarily due to the Company's proposed mandatory demand
17 charges for Residential customers.

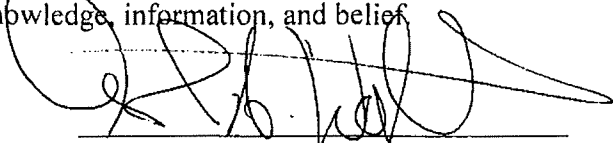
18
19 **Q. Does this complete your testimony?**

20 A. Yes.

VERIFICATION

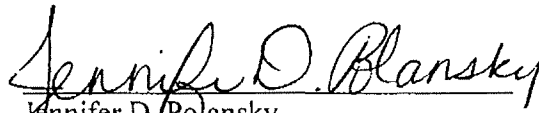
COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HANOVER) ss:

Glenn A. Watkins, being duly sworn upon his oath, deposes and states that he is a consultant for the Citizens' Utility Ratepayer Board, that he has read and is familiar with the foregoing *Cross-Answering Testimony*, and that the statements made herein are true and correct to the best of his knowledge, information, and belief.



Glenn A. Watkins

SUBSCRIBED AND SWORN to before me this 4th day of April, 2024.



Jennifer D. Polansky
Notary Public

I was commissioned as Jennifer R. Dolen

My Commission expires: October 31, 2026
Reg. #7315146



**Southern Pioneer Electric Company
Staff Proposed
Residential Space Heating Bill Frequency Analysis**

Change In Bill	Winter Rate Period								
	Average Winter	Jan	Feb	Mar	Apr	May	Jun	Nov	Dec
< -20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
-15% to -20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
-10% to -15%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
-5% to -10%	0.00%	1.63%	0.81%	0.00%	0.00%	0.27%	0.54%	0.27%	0.81%
-5% to 0%	4.34%	8.67%	15.99%	6.23%	5.42%	2.98%	5.42%	1.90%	8.13%
0% to +5%	19.51%	29.54%	38.21%	20.60%	14.63%	11.38%	18.70%	11.11%	26.56%
+5% to +10%	28.73%	26.02%	26.56%	24.66%	21.68%	14.91%	19.51%	18.43%	24.66%
+10% to +15%	23.85%	16.26%	10.30%	20.60%	23.04%	17.34%	15.99%	21.14%	17.62%
+15% to +20%	12.47%	5.69%	3.25%	14.91%	13.01%	15.99%	11.38%	11.92%	10.03%
+20% to +25%	6.23%	5.42%	2.71%	5.15%	9.49%	10.84%	10.03%	12.74%	4.61%
> 25%	4.88%	6.78%	2.17%	7.86%	12.74%	26.29%	18.43%	22.49%	7.59%

Change In Bill	Summer Rate Period				
	Average Summer	Jul	Aug	Sep	Oct
< -20%	0.00%	0.00%	0.00%	0.00%	0.00%
-15% to -20%	0.00%	0.00%	0.00%	0.00%	0.00%
-10% to -15%	0.27%	0.81%	1.08%	0.81%	0.00%
-5% to -10%	6.50%	8.67%	15.18%	8.40%	1.90%
-5% to 0%	23.04%	23.85%	30.35%	24.66%	9.76%
0% to +5%	26.02%	25.75%	27.10%	28.73%	22.22%
+5% to +10%	20.33%	12.74%	10.57%	17.62%	24.12%
+10% to +15%	11.65%	10.84%	6.78%	9.21%	15.18%
+15% to +20%	4.88%	10.03%	3.25%	3.79%	9.21%
+20% to +25%	4.07%	1.90%	1.90%	1.63%	6.78%
> 25%	3.25%	5.42%	3.79%	5.15%	10.84%

**Southern Pioneer Electric Company
Southern Pioneer Proposed
Residential Space Heating Bill Frequency Analysis**

Change In Bill	Winter Rate Period								
	Average Winter	Jan	Feb	Mar	Apr	May	Jun	Nov	Dec
< -20%	8.13%	14.91%	25.20%	10.84%	5.96%	1.90%	3.79%	1.08%	12.47%
-15% to -20%	5.96%	7.86%	8.94%	3.79%	2.44%	1.36%	2.17%	2.71%	4.88%
-10% to -15%	3.79%	7.59%	9.49%	5.42%	5.15%	2.98%	2.44%	1.90%	9.76%
-5% to -10%	7.86%	7.05%	8.94%	6.50%	6.78%	2.17%	7.05%	3.79%	7.32%
-5% to 0%	12.20%	7.05%	10.84%	10.30%	9.21%	7.32%	7.32%	3.79%	8.40%
0% to +5%	13.55%	11.65%	11.65%	11.65%	8.13%	5.69%	11.11%	10.03%	10.03%
+5% to +10%	13.28%	15.72%	11.92%	12.74%	14.91%	12.20%	12.74%	14.63%	14.36%
+10% to +15%	15.72%	11.65%	6.50%	13.01%	16.26%	16.53%	15.45%	17.89%	12.47%
+15% to +20%	9.21%	4.34%	1.90%	13.01%	11.11%	11.92%	8.94%	10.84%	8.13%
+20% to +25%	5.15%	5.15%	2.44%	4.61%	7.86%	11.65%	9.76%	10.57%	5.42%
> 25%	5.15%	7.05%	2.17%	8.13%	12.20%	26.29%	19.24%	22.76%	6.78%

Change In Bill	Summer Rate Period				
	Average Summer	Jul	Aug	Sep	Oct
< -20%	0.00%	0.00%	0.00%	0.00%	0.00%
-15% to -20%	0.00%	0.00%	0.00%	0.00%	0.00%
-10% to -15%	0.27%	0.81%	1.08%	0.81%	0.00%
-5% to -10%	6.50%	8.67%	15.18%	8.40%	1.90%
-5% to 0%	23.04%	23.85%	30.35%	24.66%	9.76%
0% to +5%	26.02%	25.75%	27.10%	28.73%	22.22%
+5% to +10%	20.33%	12.74%	10.57%	17.62%	24.12%
+10% to +15%	11.65%	10.84%	6.78%	9.21%	15.18%
+15% to +20%	4.88%	10.03%	3.25%	3.79%	9.21%
+20% to +25%	4.07%	1.90%	1.90%	1.63%	6.78%
> 25%	3.25%	5.42%	3.79%	5.15%	10.84%

Southern Pioneer Electric Company
Staff Proposed
Residential Non-Space Heating Bill Frequency Analysis

Change In Bill	Winter Rate Period								
	Average Winter	Jan	Feb	Mar	Apr	May	Jun	Nov	Dec
< -20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
-15% to -20%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%
-10% to -15%	0.53%	2.46%	3.62%	1.06%	0.71%	0.25%	1.40%	0.40%	2.25%
-5% to -10%	7.90%	11.96%	13.50%	7.86%	6.36%	4.73%	16.62%	4.67%	10.28%
-5% to 0%	20.44%	20.17%	19.92%	15.62%	15.13%	16.31%	30.23%	13.34%	19.04%
0% to +5%	26.67%	23.22%	21.89%	19.95%	21.17%	23.14%	23.38%	21.08%	23.14%
+5% to +10%	21.29%	17.41%	18.19%	19.64%	20.82%	21.36%	12.95%	21.37%	18.25%
+10% to +15%	12.60%	11.44%	11.02%	15.45%	14.83%	14.74%	6.57%	16.05%	12.60%
+15% to +20%	5.57%	6.03%	5.71%	9.00%	9.42%	7.97%	3.69%	9.95%	6.76%
+20% to +25%	2.54%	3.11%	2.98%	5.23%	5.02%	4.66%	2.03%	5.92%	3.37%
> 25%	2.46%	4.20%	3.14%	6.18%	6.55%	6.83%	3.11%	7.21%	4.31%

Change In Bill	Summer Rate Period				
	Average Summer	Jul	Aug	Sep	Oct
< -20%	0.00%	0.00%	0.00%	0.00%	0.00%
-15% to -20%	0.00%	0.00%	0.00%	0.00%	0.00%
-10% to -15%	1.33%	3.68%	6.75%	1.87%	0.17%
-5% to -10%	31.41%	41.94%	49.55%	31.11%	6.24%
-5% to 0%	40.31%	33.41%	28.42%	37.84%	23.06%
0% to +5%	15.83%	11.36%	8.22%	16.83%	27.46%
+5% to +10%	5.45%	4.34%	3.06%	5.91%	19.07%
+10% to +15%	2.81%	2.26%	1.67%	3.11%	10.46%
+15% to +20%	1.26%	1.19%	0.74%	1.10%	6.07%
+20% to +25%	0.61%	0.69%	0.54%	0.91%	3.22%
> 25%	1.00%	1.13%	1.05%	1.32%	4.25%

Southern Pioneer Electric Company
Southern Pioneer Proposed
Residential Non-Space Heating Bill Frequency Analysis

Change In Bill	Winter Rate Period								
	Average Winter	Jan	Feb	Mar	Apr	May	Jun	Nov	Dec
< -20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
-15% to -20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%
-10% to -15%	0.40%	1.75%	2.69%	0.74%	0.38%	0.14%	0.86%	0.27%	1.67%
-5% to -10%	6.45%	10.97%	12.36%	6.97%	5.60%	3.95%	14.12%	4.01%	9.25%
-5% to 0%	19.30%	19.93%	19.81%	14.85%	14.15%	14.78%	30.08%	12.23%	18.33%
0% to +5%	26.78%	22.97%	21.86%	19.87%	20.97%	23.05%	24.59%	20.92%	23.38%
+5% to +10%	22.07%	18.34%	19.16%	20.19%	21.27%	21.85%	14.11%	21.45%	18.70%
+10% to +15%	13.70%	11.80%	11.61%	15.89%	15.50%	15.78%	7.04%	16.97%	13.30%
+15% to +20%	5.99%	6.52%	6.06%	9.45%	9.97%	8.43%	3.74%	10.26%	7.19%
+20% to +25%	2.65%	3.34%	3.15%	5.45%	5.30%	4.88%	2.16%	6.28%	3.68%
> 25%	2.65%	4.39%	3.31%	6.61%	6.86%	7.15%	3.29%	7.61%	4.50%

Change In Bill	Summer Rate Period				
	Average Summer	Jul	Aug	Sep	Oct
< -20%	0.00%	0.00%	0.00%	0.00%	0.00%
-15% to -20%	0.00%	0.00%	0.00%	0.00%	0.00%
-10% to -15%	1.33%	3.68%	6.75%	1.87%	0.17%
-5% to -10%	31.41%	41.94%	49.55%	31.11%	6.24%
-5% to 0%	40.31%	33.41%	28.42%	37.84%	23.06%
0% to +5%	15.83%	11.36%	8.22%	16.83%	27.46%
+5% to +10%	5.45%	4.34%	3.06%	5.91%	19.07%
+10% to +15%	2.81%	2.26%	1.67%	3.11%	10.46%
+15% to +20%	1.26%	1.19%	0.74%	1.10%	6.07%
+20% to +25%	0.61%	0.69%	0.54%	0.91%	3.22%
> 25%	1.00%	1.13%	1.05%	1.32%	4.25%

CERTIFICATE OF SERVICE

24-SPEE-415-TAR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 11th day of April, 2024, to the following:

JAMES P. ZAKOURA, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
jzakoura@foulston.com

JEFFRY POLLOCK
J. POLLOCK, INCORPORATED
14323 South Outer 40 Rd.
Ste. 206N
Town and Country, MO 63017-5734
JCP@JPOLLOCKINC.COM

BRIAN G. FEDOTIN, GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
b.fedotin@kcc.ks.gov

CARLY MASENTHIN, LITIGATION
COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
c.masenthin@kcc.ks.gov

KYLER C. WINEINGER, LITIGATION
COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
k.wineinger@kcc.ks.gov

TREVOR WOHLFORD, ATTORNEY
MORRIS LAING EVANS BROCK &
KENNEDY
800 SW JACKSON
SUITE 1310
TOPEKA, KS 66612-1216
twohlford@morrislaing.com

GLENDA CAFER, MORRIS LAING LAW
FIRM
MORRIS LAING EVANS BROCK &
KENNEDY CHTD
800 SW JACKSON STE 1310
TOPEKA, KS 66612-1216
gcafer@morrislaing.com

BRIAN BEECHER, OPERATIONS AND
ENGINEERING MANAGER
SOUTHERN PIONEER ELECTRIC
COMPANY
3997 NE WELL ROAD
PO BOX 347
MEDICINE LODGE, KS 67104
BBEECHER@SOUTHERNPIONEER.NET

LINDSAY CAMPBELL, INTERIM
PRESIDENT & CEO
SOUTHERN PIONEER ELECTRIC
COMPANY
1850 W OKLAHOMA
PO BOX 430
ULYSSES, KS 67880-0368
lcampbell@pioneerelectric.coop

LARISSA LAYMAN, LEGAL EXECUTIVE
ASSISTANT
SOUTHERN PIONEER ELECTRIC
COMPANY
1850 W OKLAHOMA
PO BOX 430
ULYSSES, KS 67880-0368
LLAYMAN@PIONEERELECTRIC.COOP

RICHARD J. MACKE, VP - ECONOMICS,
RATES, AND BUSINESS PLANNING DPT.
SOUTHERN PIONEER ELECTRIC
COMPANY
10710 Town Square Dr NE Ste 201
Minneapolis, MN 55449
rmacke@powersystem.org

CLINT MEIER, VP - ENGINEERING AND
OPERATIONS
SOUTHERN PIONEER ELECTRIC
COMPANY
1850 WEST OKLAHOMA
PO BOX 403
ULYSSES, KS 67880
cmeier@pioneerelectric.coop

CHANTRY SCOTT, INTERIM ASST CEO &
CFO
SOUTHERN PIONEER ELECTRIC
COMPANY
1850 WEST OKLAHOMA
PO BOX 403
ULYSSES, KS 67880
CSCOTT@PIONEERELECTRIC.COOP



Shonda Rabb
Public Service Administrator