

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

In the Matter of the Application of Kansas City)
Power & Light Company for Approval of Changes) Docket No.: 18-KCPE-063-TAR
to its Estimated Bill Procedures)

**APPLICATION OF KANSAS CITY POWER & LIGHT COMPANY FOR
APPROVAL OF CHANGES TO ITS ESTIMATED BILL PROCEDURES AND
APPROVAL OF ITS ESTIMATED BILL PROCEDURE TARIFF**

COMES NOW Kansas City Power & Light Company (“KCP&L” or the “Company”) and hereby respectfully requests approval from the State Corporation Commission of the State of Kansas (“Commission”) of changes to the Company’s estimated bill procedures. In support of this Application, KCP&L states the following:

I. THE APPLICANT

1. KCP&L is a Missouri corporation and a vertically integrated electric public utility company under the jurisdiction of the Commission engaged in the production, transmission, delivery and furnishing of power within the meaning of K.S.A. 66-104, in legally designated areas of Kansas. KCP&L holds a certificate of convenience and authority issued by the Commission, authorizing KCP&L to engage in such utility business. KCP&L has previously filed with the Commission certified copies of its Articles of Incorporation under which it was organized, its Certificate of Registration as a Foreign Corporation authorized to do business in Kansas, and all amendments thereto and restatements thereof, and the same are incorporated herein by reference.

II. DESCRIPTION OF THE COMPANY’S REQUEST

2. KCP&L is in the process of changing its current billing system to the Oracle Utilities Customer Care and Billing (“CCB”) information system. The CCB system will consolidate multiple existing systems while handling aspects of an electric customer’s lifecycle

such as service connection, billing, payment processing, collections and customer contacts. The estimated implementation date for CCB is April 1, 2018. The bill estimation calculation employed by CCB is different from the current bill estimation procedure. Per the Electric, Natural Gas and Water Billing Standards in Section I. Standards on Billing Practices, C. (1) in Kansas, "The utility may render a bill based on estimated meter reading only if the estimating procedures employed by the utility and any substantial changes in those procedures have been approved by the Commission..." The Company is requesting approval of the CCB estimating procedure described below, and its Estimated Bill Procedure tariff. In the current KCP&L billing system, CIS Plus, when a meter read is unavailable for current month billing, if customer history is available, the system will estimate usage based upon the customer's previous usage and a historical trend of like customers. A trend table record stores data regarding usage by Customer Class, Rate Class, Rate Sub class, Meter Read Cycle, Month/Year, Unit of Measure and Bill Period End Date. Estimated usage is calculated by using the following formula: $\text{Recent} * (\text{History}/\text{Trend}) * \text{Days}$. "Recent" is the average of the last three days of usage for similar customers from the Trend table. "History" is the customer's historical daily usage over and up to the last twelve billing cycles. "Trend" is the historical daily usage of similar customers from the Trend table during the same billing periods as the customer's "History" calculation. "Days" references the number of bill days to be estimated. In the absence of sufficient customer history, estimated usage is calculated from a rate schedule estimation table for customers with both Advanced Metering Infrastructure ("AMI") and non-AMI meters.

3. CCB uses a different procedure for estimating a customer's usage when a meter read is not available. It differs depending on whether or not a customer has an AMI meter. For customers with Advanced Metering Infrastructure (AMI) meters, when a current meter read is

unavailable, the system will average consumption from the three-prior days to estimate a read. If that information is not available, a second estimation attempt will be made. The system will average the usage from five historical reads from the previous year. It will average the usage from the read in the prior year from the same day as being estimated along with the three days prior and one day after. If the second estimation attempt is not successful, then the estimation is a manual process. The Billing Department will estimate usage based on historical usage information from the same premise and if not available, the usage of customers with like premises. For customers with non-AMI meters, when a current meter read is unavailable, the system will average the usage from the prior year in the same billing month and the following billing month. If that information is not available, a second read estimation attempt will be made by averaging the usage from the prior two readings. If the second estimation attempt is not successful, then the estimation is a manual process. The Billing Department will estimate usage based on historical usage information from the same premise and if not available, the usage of customers with like premises.

4. The Company reviewed 200 accounts for KCP&L AMI meter customers and approximately 60 non-AMI meters. A comparison was run of current bill estimation procedures and proposed bill estimation procedures and the results were compared to actuals. In each case, the proposed bill estimation procedure produced results that were closer to actual volumes than the current bill estimation procedure.

5. A copy of the proposed tariff is attached as **Exhibit A**.

6. KCP&L anticipates that its new bill estimation procedures will provide benefits to its Kansas customers. Commission approval of the bill estimation procedures tariff as proposed herein is in the public interest.

III. PROCEDURAL MATTERS

7. In accordance with K.S.A. 66-117, KCP&L respectfully requests the Commission approve this application and tariff as proposed, within 240 days of the filing of this Application, with the tariff to take effect on the date of CCB implementation.

IV. SERVICE

8. In addition to the undersigned, all correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

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WHEREFORE, KCP&L respectfully requests that the Commission approve the proposed bill estimation procedures and grant such other and further relief as may be identified during the course of this docket and as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Roger W. Steiner

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**ATTORNEYS FOR
KANSAS CITY POWER & LIGHT COMPANY**

VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

I, Carol L. Sivils, being duly sworn, on oath state that I am Supervisor – Regulatory Affairs of Kansas City Power & Light Company, that I have read the foregoing Application and know the contents thereof, and that the facts set forth therein are true and correct to the best of my knowledge and belief.

KANSAS CITY POWER & LIGHT COMPANY

By: Carol L. Sivils
Carol L. Sivils

The foregoing Application was subscribed and sworn to before me this August 4th, 2017.

Anthony R. Westenkirchner
Notary Public

My Commission Expires:

4/26/2021



KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule _____ Sheet _____

Rate Areas 2 & 4

(Territory to which schedule is applicable)

which was filed _____

No supplement or separate understanding
shall modify the tariff as shown hereon.Sheet 31A of 99 Sheets**GENERAL RULES AND REGULATIONS
APPLYING TO ELECTRIC SERVICE****4. BILLING AND PAYMENT (continued)****4.08 ESTIMATED BILL PROCEDURE: (continued)****(A) ESTIMATION METHOD: (continued)**

(1) For customers with Advanced Metering Infrastructure (AMI) meters, when a current meter read is unavailable, the system will average consumption from the three-prior days to estimate a read. If that information is not available, a second estimation attempt will be made. The system will average the usage from five historical reads from the previous year. It will average the usage from the read in the prior year from the same day as being estimated along with the three days prior and one day after. If the second estimation attempt is not successful, then the estimation is a manual process. The Billing Department will estimate usage based on historical usage information from the same premise and if and not available, the usage of customers with like premises.

(2) For customers with non-AMI meters, when a current meter read is unavailable, the system will average the usage from the prior year in the same billing month and the following billing month. If that information is not available, a second read estimation attempt will be made by averaging the usage from the prior two readings. If the second estimation attempt is not successful, then the estimation is a manual process. The Billing Department will estimate usage based on historical usage information from the same premise and if not available, the usage of customers with like premises.

Issued:	TBD		
	Month	Day	Year
Effective:	TBD		
	Month	Day	Year
By:	Darrin R. Ives		Vice President
			Title