

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 Amendment of        )  
the Grandfathering Dates in their RS-DG        )  
and RS Tariffs                                        )

Docket No. 19-WSEE- 474TAR

**JOINT APPLICATION FOR AMENDMENT OF GRANDFATHERING DATES IN RS-DG TARIFFS**

COME NOW Westar Energy, Inc. (Westar Energy) and Kansas Gas and Electric Company (KGE), (collectively referred to herein as “Westar”) and file this Joint Application for Amendment to their RS-DG and RS tariffs. In support of this Joint Application, Westar respectfully states as follows:

1. In Docket No. 15-WSEE-115-RTS (“2015 General Rate Case”), the Commission approved Westar’s implementation of a new rate class for customers with distributed generation connected to Westar’s system – the Residential Standard Distributed Generation (“RS-DG”) rate schedule. Customers with distributed generation connected to Westar’s system after October 28, 2015, were required to take service under the RS-DG rate schedule instead of Westar’s Residential Standard (“RS”) rate schedule. The grandfathering date of October 28, 2015 was established because that was the date that rates set in the 2015 General Rate Case became effective. At the time the RS-DG tariff was created in the 2015 General Rate Case, the RS-DG tariff had identical rate structure and rates as the RS tariff; however, Westar agreed to notify customers that the rates and rate structure might change in the future.

2. In Docket No. 18-WSEE-328-RTS (“2018 General Rate Case”), the Commission approved a change in the structure of the RS-DG tariff, implementing a three-part rate with a demand charge for customers taking service under that tariff. The grandfathering date of October

28, 2015 that was established in the 2015 General Rate Case stayed the same, so customers with distributed generation connected prior to October 28, 2015, could take service under the RS tariff (with the two-part rate structure) and customers with distributed generation connected after October 28, 2015, were required to take service under the RS-DG tariff (with the three-part rate structure). The rates set by the 2018 General Rate Case, including the new three-part rate structure for the RS-DG tariff, became effective on September 27, 2018.

3. Westar made significant efforts to notify customers who installed distributed generation after October 28, 2015, that they would be placed on the RS-DG tariff and that there was a potential that the rates and rate structure under that tariff would change in the future. As part of their interconnection application, customers were notified of the potential for a rate change. Additionally, a customer acknowledgement of this change was required prior to approval of the interconnection application. Westar also provided notice to installers of distributed generation in Westar's service area of the potential for a change in the RS-DG rate structure so that those installers could notify potential customers when they were considering whether or not to install distributed generation.

4. However, Climate and Energy Project – on behalf of residential customers with solar distributed generation – raised concerns that given the amount of time between the grandfathering date of October 28, 2015, and September 27, 2018, when the rates for customers under the RS-DG tariff actually changed and became different from the rates under the RS tariff, and despite Westar's (and distributed installation installers) efforts at providing notice to customers about the potential change in the rate structure, customers installing distributed generation between October 28, 2015, and September 27, 2018, did not fully appreciate the timing of the change in rate structure and did not give the notices they received full consideration or

recognize the possibility of potential ramifications of the change until they started receiving bills based on the new rate structure.

5. In order to address the misunderstanding about the timing of the changes in rate structure and better align Westar's RS-DG tariff adoption with its sister company, Kansas City Power & Light Company's, tariff adoption for customers with distributed generation, Westar proposes to adjust the grandfathering date to October 1, 2018, as reflected in the redlined tariffs attached hereto. With this change, customers connecting distributed generation to Westar's system prior to October 1, 2018, will be switched to take service under the RS tariff on a prospective basis and customers connecting distributed generation after that date would be required to take service under the RS-DG tariff.

6. Westar has analyzed the impact of this proposed change on the customers currently taking service under the RS-DG tariff who will be switched back to the RS tariff as a result of the change in the grandfathering date and determined that on a class wide basis, there would be virtually no impact to the customers directly affected by the proposed change. Additionally, Westar's proposed change will have no impact on the rates paid by any other customer class.

7. Westar requests that the Commission approve the changes proposed in the attached redlined tariffs within 60 days of this Application in order to help alleviate the impacts of the misunderstanding around timing that has occurred as quickly as possible.

WHEREFORE, Joint Applicants respectfully request that the Commission issue an order approving the amendment to the grandfathering date in its RS-DG and RS tariffs as proposed herein.

Respectfully submitted,

*/s/ Cathryn J. Dinges*

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**Counsel for Westar Energy, Inc. and  
Kansas Gas and Electric Company**

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**THE STATE CORPORATION COMMISSION OF KANSAS**

WESTAR ENERGY, INC & KANSAS GAS & ELECTRIC COMPANY, d.b.a. WESTAR ENERGY  
(Name of Issuing Utility)

SCHEDULE RS-DG

Replacing Schedule RS-DG Sheet 1

WESTAR RATE AREA

(Territory to which schedule is applicable)

which was filed June 8, 2017

No supplement or separate understanding shall modify the tariff as shown hereon

Sheet 1 of 4 Sheets

RESIDENTIAL STANDARD DISTRIBUTED GENERATION

AVAILABLE

Electric Service is available under this rate schedule at points on the Company's existing distribution system to customers using electric service for residential purposes. Any customer-generator operating or adding generation powered by renewable energy resources (see Definitions and Conditions #2) or taking service under an interconnection agreement connecting to Westar's distribution system after October 1, 2018 must take service under this rate schedule.

Deleted: October 28, 2015

APPLICABLE

Applicable to residential customers that have dwelling unit(s) each having separate kitchen facilities, sleeping facilities, living facilities and permanent provisions for sanitation. This rate schedule is restricted to residential electric service used principally for domestic purposes in customer's household, home, detached garage on the same premise as customer's home, or place of dwelling for the maintenance or improvement of customer's quality of life. Service to customers in rural areas through a single meter under this schedule may also use electric service in farm buildings for ordinary farm use providing that such buildings are adjacent to the customer's dwelling unit. However, this schedule is not applicable for crop irrigation, commercial dairies, hatcheries, feed lots, feed mills or any other commercial enterprise. This schedule is not applicable to backup, breakdown, standby, supplemental, short term, resale or shared electric service.

CHARACTER OF SERVICE

Alternating current, 60 hertz, single phase, at nominal voltages of 120 or 120/240 volts.

Issued \_\_\_\_\_  
Month Day Year

Effective September 27 2018  
Month Day Year

By \_\_\_\_\_  
Darrin Ives, Vice President

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**THE STATE CORPORATION COMMISSION OF KANSAS**

WESTAR ENERGY, INC & KANSAS GAS & ELECTRIC COMPANY, d.b.a. WESTAR ENERGY  
(Name of Issuing Utility)

SCHEDULE \_\_\_\_\_ RS \_\_\_\_\_

Replacing Schedule \_\_\_\_\_ RS \_\_\_\_\_ Sheet \_\_\_\_\_ 1 \_\_\_\_\_

WESTAR RATE AREA

(Territory to which schedule is applicable)

which was filed \_\_\_\_\_ June 8, 2017 \_\_\_\_\_

No supplement or separate understanding shall modify the tariff as shown hereon

Sheet 1 of 7 Sheets

RESIDENTIAL STANDARD SERVICE

AVAILABLE

Electric Service is available under this rate schedule at points on the Company's existing distribution system to customers using electric service for residential purposes. Residential Standard Service is not available to new customer-generators operating generation powered by renewable energy resources (see Definitions and Conditions #3) taking service or adding renewable resources after October 1, 2018.

Deleted: October 28, 2015

APPLICABLE

Applicable to residential customers that have dwelling unit(s) each having separate kitchen facilities, sleeping facilities, living facilities and permanent provisions for sanitation. This rate schedule is restricted to residential electric service used principally for domestic purposes in customer's household, home, detached garage on the same premise as customer's home, or place of dwelling for the maintenance or improvement of customer's quality of life. Service to customers in rural areas through a single meter under this schedule may also use electric service in farm buildings for ordinary farm use providing that such buildings are adjacent to the customer's dwelling unit. However, this schedule is not applicable for crop irrigation, commercial dairies, hatcheries, feed lots, feed mills or any other commercial enterprise. This schedule is not applicable to backup, breakdown, standby, supplemental, short term, resale or shared electric service.

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