Law Offices of

2006.12.04 10:44:00 Kansas Corporation Commission /S/ Susan K. Duffy

Anderson & Byrd

A Limited Liability Partnership

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December 1, 2006

THIS FILING CONTAINS
CONFIDENTIAL INFORMATION

Ms. Susan K. Duffy Executive Director Kansas Corporation Commission 1500 S.W. Arrowhead Road Topeka, Kansas 66604-4027

> Re: The Empire District Electric Company Annual Energy Cost Adjustment Filing

> > Docket No. 06-EPDE-1016-EPR

STATE CORPORATION COMMISSION

DEC 0 1 2006

Saux Lalyffy Docket Room

Dear Ms. Duffy:

Attached to this letter is the annual calculation of the (over)/under recovery of energy costs for the Energy Cost Adjustment ("ECA") year ending October 31, 2006, the annual calculation of over/(under) refund of the prior year's off-system sales margins (Kansas jurisdictional) that flow through the ECA, and the annual forecast of energy costs for the upcoming calendar year 2007.

The annual calculation of actual energy costs (over)/under recovery differs from that previously forwarded monthly to the staff of the Kansas Corporation Commission for several reasons. The primary difference is related to the month of January 2006. The monthly ECA filing made by The Empire District Electric Company ("Empire") that displayed the January 2006 activity was incorrect. The initial monthly filing related to the January 2006 (over)/under recovery only included a partial month of the January energy costs that are eligible for recovery under the Kansas ECA. This resulted in an understatement of the under recovery of January 2006 energy costs in the prior monthly filing. The annual (over)/under recovery analysis attached to this letter includes a full month of January 2006 energy costs eligible for ECA recovery and corrects this error. In addition to the inclusion of a full month of January 2006 energy costs, the annual reconciliation includes corrections to eligible ECA energy costs related to fuel handling that flow through account 501 and 547 fuel and a correction made to the net cost of hydro energy sold off-system to eliminate a double counting of the hydro energy costs related to off-system sales.

Empire has also attached to this letter, summaries of the monthly energy costs forecast for the upcoming calendar year 2007. In addition to these monthly summaries, Empire will forward a

Ms. Susan K. Duffy Page 2 December 1, 2006

spreadsheet to the Commission staff that will display the details behind the 2007 energy cost forecast. The information included in the energy cost forecast is Highly Confidential and Empire requests that it be treated as Highly Confidential by the Kansas Corporation Commission staff pursuant to the terms of the Protective Order issued on March 22, 2006, in the above-referenced docket. The information is confidential because it is information that has not been disclosed to the public and if disclosed, could place Empire at a competitive disadvantage in negotiating future fuel contracts. Included in the information on this spreadsheet will be information such as the following for each supply resource:

- Hours of operation
- Fuel cost in total and by fuel type
- Capacity factor
- Heat rate
- Starts
- MWH of output
- Fuel cost per MWH and MMBtu
- Unit Outage Schedules
- Natural gas price assumptions for 2007

In general terms the fuel model for the 2007 Kansas ECA produced an expected natural gas burn of 10.3 million MMBtus. Empire has already procured 5.3 million MMBtus of physical natural gas at fixed prices for use in calendar year 2007. In addition, Empire currently has in place financial instruments that fix the price of an additional 2.7 million MMBtus of natural gas. In total Empire has already locked in the price associated with approximately 78 percent of its expected natural gas requirements for calendar year 2007. The remaining 23 percent of Empire's natural gas requirements are expected to be met using spot purchases. This general approach to the purchase of natural is subject to modification if conditions cause a significant change in the expected natural gas consumption.

Please contact Scott Keith at Empire if you have any questions concerning the information attached to this letter.

Sincerely,

James G. Plaherty iflaherty@andersonbyrd.com

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JGF:rr Enclosure

cc: W. Scott Keith Otto Newton

Empire District Electric Co. Annual ACA Calculation For The ECA Year Ending 12/31/2007

Schedule 1

Fue.	ii Li-	<u>January-07</u> 11,949,270	February-07 9,875,970	March-07 9,295,938	April-07 6,417,151	May-07 7,696,169	June-07 10,055,529	<u>July-07</u> 14,037,263	August-07 13,673,596	September-07 8,988,901	October-07 8,670,679	November-07 9,296,266	December-07 9,363,547
Purchased Power	ď.	5,677,981	5,604,981	3,816,834	3,650,834	3,394,834	4,006,834	3,498,384	3,620,384	4,981,384	6,146,834	4,634,834	4,369,400
Interchange	ž	(915.576)	(1,062,529)	(1,182,615)	(567,655)	(570,892)	(708,133)	(1,169,379)	(1,182,956)	(1,321,850)	(237,903)	(634,818)	(789,687)
Emission Allowance Total ECA Eligible Costs	ü	0	0	0	0	0	0	0	0	0	0	O	0
Kansas ECA Billed KWH	'n	25,255,000	21,328,000	21,217,000	17,983,000	19,797,000	23,966,000	30,561,000	29,887,000	22,761,000	19,463,000	20,887,000	23,894,000
Total Company Billed KWH		481,719,000	408,715,000	404,123,000	355,080,000	379,215,000	439,506,000	529,077,000	521,914,000	411,124,000	376.679,000	390,949,000	461,999,000
Kansas Jurisdiction Factor	X =	5.24%	5.22%	5.25%	5.06%	5.22%	5.45%	5.78%	5.73%	5.54%	5.17%	5.34%	5.17%
Average Cost per KWH Sold-Kansas		3,469	3.528	2.952	2.676	2.774	3.038	3.093	3.087	3.077	3.871	3.401	2.802
Credit for Off-system Sales Profits		(0.077)	(0.077)	(0.077)	(0.077)	(0.077)	(0.077)	(0.077)	(0.077)	(0.077)	(0.077)	(0.077)	(0.077)
Annual Settlement Factor		0.264	0.264	0.264	0.264	0.264	0.264	0.264	0.264	0.264	0.264	0.264	0.264
Total ECA per KWH Sold-Kansas	cents per KWH	3.656	3.715	3.139	2.863	2.961	3.225	3.280	3.274	3.264	4.058	3.588	2.989

STATE CORPORATION COMMISSION

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Empire District Electric Co. Annual ACA Calculation For Year Ending 10/31/2006

Schedule 2

(591194) \$ (9,117.47) \$

Jan 2006 Feb 2006 Mar 2006 Apr 2006 May 2006 Jun 2006 Jul 2006 Aug 2006 Sep 2006 Oct 2006 Total Nov Dec F= \$ 4,379,817.44 \$ 7,758,446.00 \$ 8,741,244,62 \$ 5,297,537.92 \$ 7,110,468.11 \$ 10,375,889.54 \$ 12,526,874.96 \$ 15,342,114.62 \$ 5,910,842.13 \$ 5,267,216.65 \$ 82,710,451.99 Fuel 3,368.137.04 3,222,817.56 3,045,610 30 3,397,195 12 3,177,699.85 3,561,454.15 4,016,034.69 39,200,219 22 P= 5,764,881.76 5,631,119 75 4,015,269.00 Purchased Power NI= (84,608.61) (624,697.26) (511,527,63) (646,681.42) (1,166,847.22) (968.663.70) (847.674.65) (373,599.43) (429,367.20) (5,719,064.05) (65,396 93) interchange Emission Allowance E≃ \$10,060,090.99 \$13,324,168.82 \$12,131,816.36 \$8,154,147,33 \$9,686,604.25 \$12,254,652.62 \$14,955,406.38 \$17,672,139.82 \$9,098,696.85 \$8,853,884.14 \$116,191,607.16 Total ECA Eligible Costs Kansas ECA Billed KWH (A) 10.617,705 18,872,811 19,976,195 16,617,019 15,788,326 20.415,392 23,643,358 26 419 855 24.253,874 17.384.006 193 988 541 16,314,111 19,701,492 22,945.355 18,872,811 19,976,195 16,617,019 15,788,326 20,415,392 23 643,358 26,419,855 24,253,874 17,384,006 242.331,794 Kansas Billed KWH 332,748,932 329,745,269 394,246,595 458.829,989 492,164,441 443,749,075 333,343,673 4,610.646,960 325.122.602 403.732.631 370.644.925 358.340.411 367,978,417 Total Company Billed KWH KF= 5.018% 4 880% 6 191% 5 267% 5 429% 4.994% 4 788% 5.178% 5.153% 5.368% 5.466% 5.215% 5.256% Kansas Jurisdiction Factor Kansas Costs Eligible for ECA Recovery s 622 785.68 \$ 701,747.59 \$ 658,591.69 \$ 407,206.78 \$ 463,798.21 \$ 634,586 42 \$ 770,647.16 \$ 948,657.26 \$ 497,305.03 \$ 461.733.60 \$ 6,167,059.42 335,497,61 344,974.92 578,163 90 723,723.19 842,793.37 714 276 59 377.754.45 5,494,265 82 343 907 46 586 944 42 646 229 91 ECA Revenue 12 361 78 \$ 71,709 17 \$ 118,823.29 \$ 83.979 15 \$ (Over)Under Recovery \$ 278.878.22 \$ 114,803 17 \$ 56,422.52 \$ 46,923.97 \$ 105,863.89 \$ (216,971.56) \$ 672,793.60 Annual Settlement Factor (Over)/Under ACA= (34,227 53) OAV= Off System Profit Factor '0" Over/(Under) 638,566 07 Total (Over)/Under Recovery Amount For ACA \$ per KWH 0.00264 New ACA Rate \$ per KWH (0.00077) New D Factor for Upcoming ECA Year Note A. The Kansas ECA became effective on January 2, 2006. The January ECA rate was effective with usage on and after January 2, 2006. Reconciliation to Summary of Fuel & Purchase Power Report \$ 4,295,208.83 \$ 7,693.049.07 \$ 8,118.838.36 \$ 4,787.821.29 \$ 6,466.945.69 \$ 9,250.372.86 \$ 11.580,387.26 \$ 14.497.964.97 \$ 5,538,139.70 \$ 4,874.343.70 \$ 77.103.071.73 Total Generation \$ 5,764,881 76 \$ 5,631,119 75 \$ 4,012,978.00 \$ 3,366,326 04 \$ 3,219,658 56 \$ 3,004,279 76 \$ 3,375,019 12 \$ 3,174,174.85 \$ 3,560,557 15 \$ 3,979,540 44 \$ 39,088,535 43 Direct Purchase-Energy \$10,060,090.59 \$13,324,168.82 \$12,131,816,36 \$8,154,147.33 \$9,686,604.25 \$12,254,652.62 \$14,955,406.38 \$17,672,139.82 \$9,098,696.85 \$8,853,884.14 \$116,191,607.16 Total Company Recoverable F&PP

\$ 1,877.50 \$

\$ (15,575.16) \$ (8,582.21) \$ (8,387.26) \$

Capacity Tolling-SWPA

Auxiliaries-WR

Total Net System Input

\$ 1,349,460,00 \$ 1,349

\$ 11,393,975.43 \$ 14,666,924,11 \$ 13,472,889,10 \$ 9,503,607.33 \$ 11,034,914.07 \$ 13,600,971.78 \$ 16,304,866.38 \$ 19,021,599.82 \$ 10,442,244.91 \$ 10,194,226.67 \$ 129,636,219.60

(1,150 18) \$ (3,140 84) 5

Empire District Electric Co.	ACA Reconciliation	For Year Fuding 10/31/2006
Empir	¥	7

Schedule 3	Total .	
	Oct 2006	
	<u>Sep 2006</u>	
	Aug 2006	·
	Jul 2006	
	Jun 2006	, v
	May 2006	
t Electric Co nciliation ng 10/31/2006	Apr. 2006	, us
Empire District Electric Co. ACA Reconciliation For Year Ending 10/31/2006	Mar 2006	
iii	Feb 2006	,
	Jan 200 <u>6</u>	, 44
	Dec	
	Nov	
		ACA=
		ance enent Factor ce
		ACA Beginning Balance Actual Annual Settlement Factor ACA Ending Balance
		4

Empire District Electric Co. Off System Profit Factor "D" Reconciliation For Year Ending 10/31/2006

Schedule 4

		Nov 2005	Dec 2005	Jan 2006	Feb 2006	Mar 2006	Apr 2006	May 2006	Jun 2006	Jul 2006	Aug 2006	Sep 2006	Oct 2006	<u>Total</u>
Kansas ECA Billed KWH	S≃	•	•	10,617,705	18,872,811	19,976,195	16,617,019	15,788,326	20,415,392	23,643,358	26,419,855	24,253,874	17,384,006	193,988,541
Total Company Billed KWH		325,122,602	403,732,631	370,644.925	358,340,411	367,978.417	332,748,932	329,745,269	394,246,595	458,829,989	492,164,441	443,749,075	333,343,673	4.610,646,960
Off-system Sales Credit Per KWH				\$ (0.00057)	\$ (0.00057) \$	(0.00057) \$	(0.00057)	(0.00057) \$	(0.00057) S	(0.00057) \$	(0.00057) \$	(0.00057) \$	(0 00057)	
Actual Off-sytem Sales Margins Cr. Kansas				\$ (6,052.09)	\$ (10,757.50) \$	(11,386.43) \$	(9,471.70)	(8,999.35) 5	(11,636.77) \$	(13,476.71) \$	(15,059.32) \$	(13,824.71) \$	(9,908.88)	(110,573.47)
Kansas Off-system Margins	OAV													144,801.00
Over/(Under)													_3	(34,227.53)

Empire District Electric Co. Off System Profit Factor "D" For The ECA Year Ending 10/31/2007

Schedule 5

	Nov 2005	Dec 2005	Jan 2006	Feb 2006	Mar 2006	Apr 2006	May 2006	Jun 2006	<u>Jul 2006</u>	Aug 2006	Sep 2006	Oct 2006	<u>Total</u>
Kansas Billed KWH	16,314,111	19,701,492	22,945,355	18,872,811	19,976,195	16,617,019	15,788,326	20,415,392	23,643,358	26,419,855	24,253,874	17.384,006	242,331,794
Total Company Billed KWH	325,122,602	403,732,631	370,644,925	358,340,411	367,978.417	332,748,932	329,745,269	394,246,595	458,829,989	492,164,441	443,749,075	333.343,673	4,610,646,960
Kansas Jurisdiction Factor-KF	5.01783%	4.87984%	6.19066%	5.26673%	5.42863%	4.99386%	4.78804%	5.17833%	5.15297%	5.36810%	5.46567%	5.21504%	5.25592%
Actual Off System Sales Margin-Total Company	\$ 346,800.65	\$ 262,057.37	\$ 67,430.00	\$ 32,928.00	\$ 333,310.36	\$ 275,648.61	\$ 369,802.18	\$ 528,686.15	\$ 447,559.88	\$ 397,551.10	\$ 241,092.64	\$ 228,716.49	\$ 3,531,583.43
Kansas Share of Off System Sales Margin-OAV													\$ 185,617.11
Rate per KWH												\$ per KWH	\$ (0.00077)

On-System F&PP Summary 2007 Kansas ECA Run (Nov-06)

CONFIDENTIAL

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THE EMPIRE DISTRICT ELECTRIC COMPANY

SUMMARY OF FUEL AND PURCHASED POWER - ON SYSTEM, OFF SYSTEM
YEAR OF 2007
Kansas ECA Run (Nov-06)

CONFIDENTIAL

THE EMPIRE DISTRICT ELECTRIC COMPANY

SUMMARY OF FUEL AND PURCHASED POWER - ON SYSTEM, OFF SYSTEM

JANUARY 2007

Kansas ECA Run (Nov-06)

CONFIDENTIAL

THE EMPIRE DISTRICT ELECTRIC COMPANY

SUMMARY OF FUEL AND PURCHASED POWER - ON SYSTEM, OFF SYSTEM
FEBRUARY 2007
Kansas ECA Run (Nov-06)

THE EMPIRE DISTRICT ELECTRIC COMPANY

SUMMARY OF FUEL AND PURCHASED POWER - ON SYSTEM, OFF SYSTEM MARCH 2007
Kansas ECA Run (Nov-06)

CONFIDENTIAL

THE EMPIRE DISTRICT ELECTRIC COMPANY SUMMARY OF FUEL AND PURCHASED POWER - ON SYSTEM, OFF SYSTEM

APRIL 2007 Kansas ECA Run (Nov-06)

THE EMPIRE DISTRICT ELECTRIC COMPANY

SUMMARY OF FUEL AND PURCHASED POWER - ON SYSTEM, OFF SYSTEM

MAY 2007

Kansas ECA Run (Nov-06)

CONFIDENTIAL

THE EMPIRE DISTRICT ELECTRIC COMPANY

SUMMARY OF FUEL AND PURCHASED POWER - ON SYSTEM, OFF SYSTEM

JUNE 2007

Kansas ECA Run (Nov-06)

THE EMPIRE DISTRICT ELECTRIC COMPANY SUMMARY OF FUEL AND PURCHASED POWER - ON SYSTEM, OFF SYSTEM

JULY 2007 Kansas ECA Run (Nov-06)

THE EMPIRE DISTRICT ELECTRIC COMPANY

SUMMARY OF FUEL AND PURCHASED POWER - ON SYSTEM, OFF SYSTEM AUGUST 2007
Kansas ECA Run (Nov-06)

CONFIDENTIAL

THE EMPIRE DISTRICT ELECTRIC COMPANY

SUMMARY OF FUEL AND PURCHASED POWER - ON SYSTEM, OFF SYSTEM
SEPTEMBER 2007
Kansas ECA Run (Nov-06)

CONFIDENTIAL

THE EMPIRE DISTRICT ELECTRIC COMPANY

SUMMARY OF FUEL AND PURCHASED POWER - ON SYSTEM, OFF SYSTEM

OCTOBER 2007

Kansas ECA Run (Nov-06)

CONFIDENTIAL

THE EMPIRE DISTRICT ELECTRIC COMPANY

SUMMARY OF FUEL AND PURCHASED POWER - ON SYSTEM, OFF SYSTEM

NOVEMBER 2007 Kansas ECA Run (Nov-06)

CONFIDENTIAL

THE EMPIRE DISTRICT ELECTRIC COMPANY

SUMMARY OF FUEL AND PURCHASED POWER - ON SYSTEM, OFF SYSTEM

DECEMBER 2007

Kansas ECA Run (Nov-06)