

In the Matter of the Application for)
Kansas City Power & Light Company to) Docket No. 17-KCPE-201-RTS
Make Certain Changes in Its Charges)
for Electric Service.)

DIRECT TESTIMONY

PREPARED BY

JOSHUA P. FRANTZ

UTILITIES DIVISION

KANSAS CORPORATION COMMISSION

April 6, 2017

1 **I. STATEMENT OF QUALIFICATIONS**

2 **Q. What is your name?**

3 A. Joshua P. Frantz.

4 **Q. By whom and in what capacity are you employed?**

5 A. I am employed by the Kansas Corporation Commission (KCC or Commission) as
6 a Senior Research Economist within the Economics and Rates Section of the
7 Utilities Division.

8 **Q. What is your business address?**

9 A. 1500 S.W. Arrowhead Road, Topeka, Kansas, 66604-4027.

10 **Q. Please describe your duties and responsibilities at the Commission.**

11 A. My duties include: providing technical analysis on electric, gas, and water
12 dockets, including complaints, compliance filings, contracts, and rate cases;
13 reviewing requests for various tariff modifications; and analyzing monthly gas
14 purchase reports and annual gas plans.

15 **Q. What is your educational background and professional experience?**

16 A. I possess a B.B.A. from Washburn University in Topeka, KS, with majors in
17 finance, marketing, and management. I am currently enrolled at Washburn
18 University, pursuing an M.B.A.

19 I have been employed by the KCC since August 2015. I have been a State of
20 Kansas employee since 2007. Prior to my employment with the KCC, I was
21 employed by the Kansas Department of Revenue (KDOR) as a Research Analyst.
22 As an employee of KDOR, my duties consisted of creating and modifying

1 databases, applications, and spreadsheets to facilitate the collection, analysis, and
2 reporting of various tax-related data.

3 **Q. Have you previously submitted testimony before this Commission?**

4 A. Yes. I testified in Docket Nos. 16-KGSG-491-RTS, 16-KCPE-446-TAR, and 16-
5 KCPE-160-MIS. In addition, I have prepared Report and Recommendations in
6 the following Dockets: 17-SPEE-219-TAR, 16-GIME-258-GIE, 15-WSEE-532-
7 MIS, 14-WSEE-148-TAR, and 05-ATMG-617-HED. I have also participated in
8 other dockets as a member of KCC Staff (Staff).

9 **II. INTRODUCTION**

10 **Q. What is the purpose of your testimony?**

11 A. The purpose of my testimony is to sponsor Staff's rate design and Staff
12 adjustments IS-1 and IS-2 which reverse Kansas City Power & Light Company's
13 (KCP&L) proposed adjustments regarding the revenue impact resulting from
14 customer migration.

15 **Q. How is your testimony organized?**

16 A. First, I will provide a procedural background. Next, I will discuss Staff's analysis
17 of the revenue impact resulting from customer migration and recommend reversal
18 of KCP&L's proposed customer migration adjustments. Finally, I will discuss
19 Staff's proposed rate design and recommend the Commission adopt Staff's
20 proposal.

21 **Q. Did you receive any guidance with your research and analysis?**

22 A. Yes. My analysis was performed under the guidance of Dr. Robert Glass, Staff's
23 Chief of the Economics and Rates Section within the Utilities Division.

- For those identified C&I customers who change rate schedules prior to September 1, 2016, KCP&L will track the associated revenue reductions from the time they switch rates. Such revenue reductions will be deferred in a regulatory asset account for consideration in the abbreviated rate case. KCP&L will provide a final update to the regulatory asset value on or before the date of the prehearing conference in the abbreviated rate case. KCP&L's update shall include through the last full calendar month prior to the date of the prehearing conference.
- KCP&L will develop new billing determinants for use in the abbreviated rate case that reflect the migration of those customers who changed rate schedules prior to September 1, 2016. A new Class Cost of Service Study will not be required, as any revenue increase or decrease identified in the abbreviated rate case will be allocated on an equal percentage basis.⁴

IV. ANALYSIS

Customer Migration

Q. What were Staff's expectations, based upon the Joint Motion for Approval of Process to Implement Migration Adjustment?

A. Staff expected that when KCP&L developed new billing determinants for use in the abbreviated rate case to reflect customer migration, the test year (ending June 30, 2014) billing determinants would be adjusted based upon test year billing determinant data for those customers that switched rate schedules prior to September 1, 2016.

Additionally, although Staff agreed that KCP&L would provide a final update to the value of the regulatory asset used to track revenue reductions due to customer migration on or before the date of the prehearing conference in the abbreviated rate case, Staff expected the initial calculation of revenue reduction

⁴ Joint Motion for Approval of Process to Implement Migration Adjustment, ¶11, Docket No. 15-KCPE-116-RTS (Sept. 24, 2015).

1 due to customer migration included as part of KCP&L's Application would be
2 based upon actual lost revenues through the date of the initial Application.

3 **Q. Did KCP&L include adjustments for customer migration in its Application?**

4 A. Yes. KCP&L used 2015 billing determinants⁵ as a proxy for actual billing
5 determinants in order to adjust test year billing determinants and estimate lost
6 revenues due to customer migration. KCP&L will provide a final update to the
7 billing determinants and to the value of lost revenues due to customer migration
8 on or before the date of the prehearing conference. Staff expects this update will
9 incorporate actual billing determinants instead of 2015 placeholder data KCP&L
10 used to create its initial estimate.

11 **Q. Did KCP&L's billing determinant adjustment methodology comport with**
12 **Staff's expectations?**

13 A. No. As noted above, Staff's expectation was that the test year billing
14 determinants would be adjusted to reflect customer migration based upon test year
15 billing determinant data for customers who switched rate schedules. However,
16 KCP&L made its billing determinant adjustments using 2015 billing determinants
17 for those customers that switched rate schedules. Staff requested customer-level
18 billing determinant data for the test year, but was told that data was not available.⁶

19 **Q. How does Staff think the test year billing determinants should be adjusted**
20 **for customer migration?**

21 A. Because customer-level billing determinant data is not available for the test year,
22 Staff believes the test year billing determinants should be adjusted for customer
23 migration based upon 2016 billing determinant data since this time period falls

⁵ KCP&L's response to KCC Staff DR 43.

⁶ KCP&L's response to KCC Staff DR 44.

1 within the time period that will be used to update the lost revenues associated with
2 customer migration.

3 On March 29, 2016, KCP&L provided Staff with 2016 billing determinants
4 for the rate switchers and Staff is currently reviewing this data. Additionally,
5 KCP&L has agreed to provide adjusted billing determinants based upon 2016 data
6 on or before the date of the prehearing conference.

7 **Q. Did KCPL's revenue adjustment methodology comport with Staff's**
8 **expectations?**

9 **A.** No. KCP&L used 2015 billing determinants as a proxy for billing determinants
10 from the 16-month migration period⁷ in order to estimate lost revenues due to
11 customer migration. Staff has not yet received the final customer migration
12 revenue adjustment from KCP&L.

13 **Q. Are you reversing KCP&L's billing determinant and revenue adjustments**
14 **due to customer migration?**

15 **A.** Yes. Staff cannot present a reliable customer migration adjustment using the
16 methodology approved by the Commission without reviewing the final revenue
17 adjustment (and associated billing determinants). Therefore, Staff has reversed
18 KCP&L's proposed customer migration adjustments as reflected in Staff's
19 adjustments IS-1 and IS-2.

20 **Q. Is it your position that customer migration had no impact on revenue and**
21 **billing determinants in this case?**

22 **A.** No. It is almost certain that customer migration has impacted the amount of
23 revenue collected by KCP&L since the test year. However, as explained above, at
24 this time Staff cannot present a reliable customer migration revenue adjustment.

⁷ The 16-month migration period is December 2015–March 2017.

1 provides Staff with the final data necessary to review and verify the Company's
2 proposed adjustment, Staff will update its adjustment and rate design through the
3 settlement process or a separate filing with the Commission.

4 **Q. Does this conclude your testimony?**

5 A. Yes. Thank you.

KCP&L - Compliance Filing Docket No. 17-KCPE-201-RTS				
KANSAS RATE GROUP	Final Base Revenue 15-116	Decrease 17-201	Class % Increase (To current rates)	Target Revenue for Rate Classes
LARGE GEN SVC TOTAL	\$ 164,792,260	\$ (1,194,836)	-0.72506%	\$ 163,597,424
MEDIUM GEN SVC TOTAL	\$ 70,356,391	\$ (510,123)	-0.72506%	\$ 69,846,267
SMALL GEN SVC TOTAL	\$ 40,394,931	\$ (292,886)	-0.72506%	\$ 40,102,045
RESIDENTIAL TOTAL	\$ 293,969,652	\$ (2,131,444)	-0.72506%	\$ 291,838,208
LIGHTING	\$ 8,743,022	\$ (63,392)	-0.72506%	\$ 8,679,631
KANSAS TOTAL	\$ 578,256,257	(\$4,192,681)	-0.72506%	\$ 574,063,576

Current and New Residential Rates					
	Staff WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
RES-A: General Use					
Customer Charge	1,842,754	14.00	\$25,798,556	14.00	\$25,798,556
Winter	0				
1st block	1,010,243,298	0.08361	\$84,466,442	0.08292	\$83,769,374
2nd block	-	0.08361	\$0	0.08292	\$0
	1,010,243,298		\$84,466,442		\$83,769,374
Summer	0				
1st block	859,451,294	0.10829	\$93,069,981	0.10739	\$92,296,474
2nd block	-	0.10829	\$0	0.10739	\$0
	859,451,294		\$93,069,981		\$92,296,474
Total Energy Charge	1,869,694,592		\$177,536,423		\$176,065,849
RES-C: General Use and Space Heat One Meter					
Customer Charge	603,580	14.00	\$8,450,120	14.00	\$8,450,120
Winter	0				
1st block	313,279,342	0.07529	\$23,586,802	0.07467	\$23,392,568
2nd block	187,270,366	0.06575	\$12,313,027	0.06521	\$12,211,901
	500,549,708		\$35,899,828		\$35,604,469
Summer	0				
1st block	254,124,939	0.10829	\$27,519,190	0.10739	\$27,290,477
2nd block	-	0.10829	\$0	0.10739	\$0
	254,124,939		\$27,519,190		\$27,290,477
Total Energy Charge	754,674,647		\$63,419,018		\$62,894,946

RES-D: General Use with Second Space Heating Meter					
Customer Charge	150,568	14.00	\$2,107,952	14.00	\$2,107,952
Winter	0				
1st block	50,566,075	0.07529	\$3,807,120	0.07467	\$3,775,769
2nd block	8,812,441	0.06575	\$579,418	0.06521	\$574,659
Total	59,378,516		\$4,386,538		\$4,350,428
Summer	0				
1st block	57,103,194	0.10829	\$6,183,705	0.10739	\$6,132,312
2nd block	-	0.10829	\$0	0.10739	\$0
Total	57,103,194		\$6,183,705		\$6,132,312
Heating					
Winter	90,622,823	0.06575	\$5,958,451	0.06521	\$5,909,514
Summer	-	0.06575	\$0	0.06521	\$0
Total	90,622,823		\$5,958,451		\$5,909,514
Total Energy Charge	207,104,532		\$16,528,693		\$16,392,254
RTOD: Time of Day					
Customer Charge	670	20.00	\$13,400	20.00	\$13,400
Winter	0				
	407,633	0.07761	\$31,636	0.07697	\$31,376
\$0	407,633		\$31,636		\$31,376
On Peak	82,153	0.17750	\$14,582	0.17603	\$14,461
Off Peak	264,632	0.07424	\$19,646	0.07363	\$19,485
\$0	346,785		\$34,228		\$33,946
Total Energy Charge	754,418		\$65,865		\$65,322

ROU: Other Use					
Customer Charge	283	14.00	\$3,962	14.00	\$3,962
Winter	0				
1st block	67,263	0.09934	\$6,682	0.09852	\$6,627
2nd block	-	0.09934	\$0	0.09852	\$0
	67,263		\$6,682		\$6,627
Summer	0				
1st block	18,306	0.12643	\$2,314	0.12538	\$2,295
2nd block	-	0.12643	\$0	0.12538	\$0
	18,306		\$2,314		\$2,295
Total Energy Charge	85,569		\$8,996		\$8,922
Manual Bills					
Winter	310,691		\$25,061		\$24,854
Summer	92,736		\$9,852		\$9,770
Revenue Adjustment					\$0
Total Customer Charge			\$36,373,990		\$36,373,990
Total Energy Charge			\$257,558,995		\$255,427,293
Winter			\$130,749,577		\$129,671,788
Summer			\$126,809,418		\$125,755,505
Total Billed Revenue			\$293,967,898		\$291,835,907
Total Revenue			\$293,967,898		\$291,835,907

Current and New Small General Service Rates					
Small General Service at Secondary Voltage					
SGSS	KCPL WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
Customer Charge					
0-24 KW	223,997	18.46	\$4,134,985	18.33	\$4,105,865
25+ KW	10,851	48.24	\$523,452	47.89	\$519,654
Total	234,848		\$4,658,437		\$4,625,519
Facilities kW	306,709	2.843	\$871,974	2.822	\$865,533
Energy					
Winter 1st	120,037,678	0.11544	\$13,857,150	0.11460	\$13,756,318
Winter 2nd	51,770,065	0.05441	\$2,816,809	0.05402	\$2,796,619
Winter 3rd	19,544,870	0.04290	\$838,475	0.04259	\$832,416
Total Winter kWh	191,352,613		\$17,512,434		\$17,385,353
Summer 1st	74,168,969	0.14504	\$10,757,467	0.14399	\$10,679,590
Summer 2nd	32,722,340	0.06369	\$2,084,086	0.06323	\$2,069,034
Summer 3rd	11,339,254	0.05692	\$645,430	0.05651	\$640,781
Total Summer kWh	118,230,563		\$13,486,983		\$13,389,405
Total Energy	309,583,176		\$30,999,417		\$30,774,757
Total Revenue			\$36,529,828		\$36,265,810

Small General Service at Secondary Voltage, All Electric					
SGSSA	KCPL WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
Customer Charge			\$0		\$0
0-24 KW	11,552	18.46	\$213,250	18.33	\$211,748
25+ KW	1,958	48.24	\$94,454	47.89	\$93,769
Total	13,510		\$307,704		\$305,517
Facilities kW	45,098	2.843	\$128,214	2.822	\$127,267
Energy					
Winter 1st	10,611,658	0.07850	\$833,015	0.07793	\$826,967
Winter 2nd	3,548,541	0.04764	\$169,052	0.04729	\$167,811
Winter 3rd	1,164,050	0.04162	\$48,448	0.04132	\$48,099
Total Winter kWh	15,324,249		\$1,050,515		\$1,042,876
Summer 1st	4,413,722	0.14504	\$640,166	0.14399	\$635,532
Summer 2nd	1,647,592	0.06369	\$104,935	0.06323	\$104,177
Summer 3rd	586,425	0.05692	\$33,379	0.05651	\$33,139
Total Summer kWh	6,647,739		\$778,481		\$772,848
Total Energy	21,971,988		\$1,828,996		\$1,815,724
Total Revenue			\$2,264,914		\$2,248,507

Small General Service at Secondary Voltage, Unmetered					
SGSSU	KCPL WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
			\$0		\$0
Customers	26,710	7.92	\$211,543	7.86	\$209,941
Winter 1st	1,015,514	0.11544	\$117,231	0.11460	\$116,378
Winter 2nd	250,196	0.05441	\$13,613	0.05402	\$13,516
Winter 3rd	416,461	0.04290	\$17,866	0.04259	\$17,737
Total Winter kWh	1,682,171		\$148,710		\$147,631
Summer 1st	579,230	0.14504	\$84,012	0.14399	\$83,403
Summer 2nd	140,925	0.06369	\$8,976	0.06323	\$8,911
Summer 3rd	246,243	0.05692	\$14,016	0.05651	\$13,915
Total Summer kWh	966,398		\$107,003		\$106,229
Total Energy	2,648,569		\$255,713		\$253,860
Total Revenue			\$467,257		\$463,800

Small General Service at Secondary Voltage					
SGSSH	KCPL WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
Customer Charge					
0-24 KW	2,996	18.46	\$55,306	18.33	\$54,917
25+ KW	1,716	48.24	\$82,780	47.89	\$82,179
Meter Charge	4,706	2.18	\$10,259	2.16	\$10,165
Total	9,418		\$148,345		\$147,261
Facilities kW	26,329	2.843	\$74,853	2.822	\$74,300
Energy					
Winter 1st	2,381,858	0.11544	\$274,962	0.11460	\$272,961
Winter 2nd	505,745	0.05441	\$27,518	0.05402	\$27,320
Winter 3rd	72,441	0.04290	\$3,108	0.04259	\$3,085
Total Winter kWh	2,960,044		\$305,587		\$303,367
Summer 1st	2,155,781	0.14504	\$312,674	0.14399	\$310,411
Summer 2nd	546,380	0.06369	\$34,799	0.06323	\$34,548
Summer 3rd	76,016	0.05692	\$4,327	0.05651	\$4,296
Total Summer kWh	2,778,177		\$351,800		\$349,254
Energy Charge	5,738,221		\$657,387		\$652,621
2nd Meter Heating					
Heat Winter	4,872,344	0.04162	\$202,787	0.04132	\$201,325
Total Heat kWh	4,872,344		\$202,787		\$201,325
Total Energy	10,610,565		\$860,174		\$853,946
Total Revenue			\$1,083,372		\$1,075,507

Small General Service at Primary Voltage					
SGSP	KCPL WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
Customer Charge			\$0		\$0
0-24 KW	36	18.46	\$665	18.33	\$660
25+ KW	12	48.24	\$579	47.89	\$575
Total	48		\$1,243		\$1,235
Facilities kW	128	2.405	\$308	2.388	\$306
Energy					
Winter 1st	71,681	0.11249	\$8,063	0.11167	\$8,005
Winter 2nd	50,928	0.05307	\$2,703	0.05269	\$2,683
Winter 3rd	73,602	0.04172	\$3,071	0.04142	\$3,049
Total Winter kWh	196,211		\$13,837		\$13,737
Summer 1st	30,345	0.14140	\$4,291	0.14037	\$4,260
Summer 2nd	22,988	0.06194	\$1,424	0.06149	\$1,414
Summer 3rd	32,265	0.05543	\$1,788	0.05503	\$1,776
Total Summer kWh	85,598		\$7,503		\$7,449
Total Energy	281,809		\$21,340		\$21,185
Total Revenue			\$22,891		\$22,725

Small General Service at Primary Voltage, All Electric					
SGSPA	KCPL WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
Customer Charge			\$0		\$0
0-24 KW	23	18.46	\$425	18.33	\$422
25+ KW	-	48.24	\$0	47.89	\$0
Total	23		\$425		\$422
Facilities kW	-	2.405	\$0	2.388	\$0
Energy	0				
Winter 1st	3,602	0.07661	\$276	0.07605	\$274
Winter 2nd	2,434	0.04641	\$113	0.04607	\$112
Winter 3rd	936	0.04032	\$38	0.04003	\$37
Total Winter kWh	6,972		\$427		\$424
Summer 1st	1,825	0.14140	\$258	0.14037	\$256
Summer 2nd	0	0.06194	\$0	0.06149	\$0
Summer 3rd	0	0.05543	\$0	0.05503	\$0
Total Summer kWh	1,825		\$258		\$256
Total Energy	8,797		\$685		\$680
Total Revenue			\$1,109		\$680
Manual Bills					
Winter	147,735		\$17,995		17,865
Summer	47,408		\$6,843		6,793
Reactive Demand					
Winter	273	0.668	\$182	0.663	\$181
Summer	66	0.668	\$44	0.663	\$44
All Classes Energy					
345,300,047	Customer Charge		\$5,327,697		\$5,289,472
	Facilities Charge		\$1,075,348		\$1,067,405
	Energy Charge		\$33,966,326		\$33,720,152
	Total billed revenue		\$40,394,435		\$40,101,687
	Total Revenue		\$40,394,435		\$40,101,687

Current and New Medium General Service Rates					
Medium General Service at Secondary Voltage					
MGSS	KCPL WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
Customer Charge	42,783	49.84	\$2,132,305	49.48	\$2,116,903
Facilities kW	2,673,135	2.909	\$7,776,150	2.888	\$7,720,014
Demand kW					
Winter	1,310,603	2.062	\$2,702,463	2.047	\$2,682,804
Summer	797,542	4.070	\$3,245,996	4.040	\$3,222,070
Total	2,108,145		\$5,948,459		\$5,904,874
Energy					
Winter 1st	210,587,372	0.08263	\$17,400,835	0.08203	\$17,274,482
Winter 2nd	134,373,504	0.04639	\$6,233,587	0.04605	\$6,187,900
Winter 3rd	34,944,287	0.03904	\$1,364,225	0.03876	\$1,354,441
Total Winter kWh	379,905,163		\$24,998,646		\$24,816,823
Summer 1st	133,667,512	0.09228	\$12,334,838	0.09161	\$12,245,281
Summer 2nd	89,279,816	0.05785	\$5,164,837	0.05743	\$5,127,340
Summer 3rd	23,089,936	0.05854	\$1,351,685	0.05812	\$1,341,987
Total Summer kWh	246,037,264		\$18,851,360		\$18,714,608
Total Energy	625,942,427		\$43,850,007		\$43,531,430
Total Revenue			\$59,706,920		\$59,273,221

Medium General Service at Secondary Voltage, All Electric (One Meter)					
MGSSA	KCPL WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
Customer Charge	5,044	49.84	\$251,393	49.48	\$249,577
Facilities kW	500,407	2.909	\$1,455,684	2.888	\$1,445,175
Demand kW					
Winter	263,529	2.828	\$745,260	2.807	\$739,726
Summer	110,558	4.070	\$449,971	4.040	\$446,654
Total	374,087		\$1,195,231		\$1,186,380
Energy					
Winter 1st	42,551,673	0.04873	\$2,073,543	0.04838	\$2,058,650
Winter 2nd	25,934,885	0.02951	\$765,338	0.02930	\$759,892
Winter 3rd	6,303,729	0.02565	\$161,691	0.02546	\$160,493
Total Winter kWh	74,790,287		\$3,000,572		\$2,979,035
Summer 1st	18,302,123	0.09228	\$1,688,920	0.09161	\$1,676,657
Summer 2nd	12,668,695	0.05785	\$732,884	0.05743	\$727,563
Summer 3rd	4,253,617	0.05854	\$249,007	0.05812	\$247,220
Total Summer kWh	35,224,435		\$2,670,811		\$2,651,441
Total Energy	110,014,722		\$5,671,383		\$5,630,476
Total Revenue			\$8,573,691		\$8,511,609

Medium General Service at Secondary Voltage, Space Heat (Two Meters)					
MGSSH	KCPL WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
Customer charge	1,331	49.84	\$66,337	49.48	\$65,858
Meter charge	1,331	2.330	\$3,101	2.31	\$3,075
Total	2,662		69,438		68,932
Facilities kW	109,762	2.909	\$319,298	2.888	\$316,993
Demand kW					
Winter	58,483	2.062	\$120,592	2.047	\$119,715
Summer	24,408	4.070	\$99,341	4.040	\$98,608
Total	82,891		\$219,933		\$218,323
Energy					
Winter 1st	3,994,893	0.08263	\$330,098	0.08203	\$327,701
Winter 2nd	2,223,929	0.04639	\$103,168	0.04605	\$102,412
Winter 3rd	520,081	0.03904	\$20,304	0.03876	\$20,158
Total Winter kWh	6,738,903		\$453,570		\$450,271
Summer 1st	3,941,669	0.09228	\$363,737	0.09161	\$361,096
Summer 2nd	2,298,668	0.05785	\$132,978	0.05743	\$132,013
Summer 3rd	545,890	0.05854	\$31,956	0.05812	\$31,727
Total Summer kWh	6,786,227		\$528,672		\$524,836
Energy Charge	13,525,130		\$982,242		\$975,107
2nd Meter Heating					
Heat Winter	7,470,436	0.02565	\$191,617	0.02546	\$190,197
TOTAL Heat kWh	7,470,436		191,617		\$640,469
Total Energy	20,995,566		\$1,173,858		\$1,165,305
Total Revenue			\$1,463,229		\$1,769,553

Medium General Service at Primary Voltage					
MGSP	KCPL WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
Customer Charge	57	49.84	\$2,841	49.48	\$2,820
Facilities kW	25,959	2.462	\$63,911	2.444	\$63,444
Demand kW					
Winter	13,184	2.022	\$26,658	2.007	\$26,460
Summer	8,112	3.983	\$32,310	3.954	\$32,075
Total	21,296		\$58,968		\$58,535
Energy					
Winter 1st	805,193	0.08075	\$65,019	0.08016	\$64,544
Winter 2nd	75,909	0.04530	\$3,439	0.04497	\$3,414
Winter 3rd	18,352	0.03566	\$654	0.03540	\$650
Total Winter kWh	899,454		\$69,112		\$68,608
Summer 1st	592,686	0.08998	\$53,330	0.08933	\$52,945
Summer 2nd	7,374	0.05605	\$413	0.05564	\$410
Summer 3rd	3	0.05356	\$0	0.05317	\$0
Total Summer kWh	600,063		\$53,743		\$53,355
Total Energy	1,499,517		\$122,856		\$121,963
Total Revenue			\$248,576		\$246,762

Medium General Service at Primary Voltage, All Electric (One Meter)					
MGSPA	KCPL WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
Customer Charge	12	49.84	\$598	49.48	\$594
Facilities kW	696	2.462	\$1,714	2.444	\$1,701
Demand kW					
Winter	278	2.767	\$769	2.747	\$764
Summer	195	3.983	\$777	3.954	\$771
Total	473		\$1,546		\$1,535
Energy					
Winter 1st	44,532	0.04738	\$2,110	0.04704	\$2,095
Winter 2nd	28,488	0.02869	\$817	0.02848	\$811
Winter 3rd	4,955	0.02495	\$124	0.02477	\$123
Total Winter kWh	77,975		\$3,051		\$3,029
Summer 1st	35,173	0.08998	\$3,165	0.08933	\$3,142
Summer 2nd	29,781	0.05605	\$1,669	0.05564	\$1,657
Summer 3rd	3,180	0.05356	\$170	0.05317	\$169
Total Summer kWh	68,134		\$5,004		\$4,968
Total Energy	146,109		\$8,055		\$7,997
Total Revenue			\$11,913		\$11,826
Manual Bills					
Winter	615,822		\$53,733		53,343
Summer	305,218		\$29,688		29,473
Reactive Demand					
Winter	408	0.674	\$275	0.669	273
Summer	118	0.674	\$80	0.669	79
All Classes Energy					
759,519,381	Customer Charge		\$2,453,474		\$2,435,752
	Meter Charge		\$3,101		\$3,075
	Facilities Charge		\$9,616,756		\$9,547,327
	Demand Charge		\$7,424,137		\$7,369,647
	Energy Charge		\$50,826,159		\$50,457,170
	Total billed revenue		\$70,407,402		\$69,896,139
	EDR adjustments		(\$52,252)		(\$52,252)
	Mpower		\$0		-
	Total Revenue		\$70,355,150		\$69,843,887

Current and New Large General Service Rates					
Large General Service at Secondary Voltage					
LGSS	KCPL WN Billing Units	Current Rates	Current Revenue	Current Rates	New Revenue
Customer charge					
0-999 KW	7,985	\$105.28	\$840,661	\$104.52	\$834,592
1001+ KW	472	\$720.07	\$339,873	\$714.85	\$337,409
Total	8,457		\$1,180,534		\$1,172,001
Facilities kW	3,611,861	\$3.049	\$11,012,564	\$3.027	\$10,933,103
Demand kWh					
Winter	1,897,689	\$3.339	\$6,336,384	\$3.315	\$6,290,839
Summer	1,124,982	\$6.577	\$7,399,007	\$6.529	\$7,345,007
Total	3,022,671		\$13,735,390		\$13,635,847
Energy					
Winter 1st	310,079,324	\$0.06939	\$21,516,404	\$0.06889	\$21,361,365
Winter 2nd	263,272,169	\$0.04216	\$11,099,555	\$0.04185	\$11,017,940
Winter 3rd	133,659,191	\$0.03150	\$4,210,265	\$0.03127	\$4,179,523
Total Winter kWh	707,010,684		\$36,826,223		\$36,558,828
Summer 1st	193,241,842	\$0.06923	\$13,378,133	\$0.06873	\$13,281,512
Summer 2nd	166,233,679	\$0.04947	\$8,223,580	\$0.04911	\$8,163,736
Summer 3rd	87,881,831	\$0.02829	\$2,486,177	\$0.02808	\$2,467,722
Total Summer kWh	447,357,352		\$24,087,890		\$23,912,970
Total Energy	1,154,368,036		\$60,914,113		\$60,471,797
Total Revenue			\$86,842,601		\$86,212,749

Large General Service at Secondary Voltage, All Electric (One Meter)					
LGSSA	KCPL WN Billing Units	Current Rates	Current Revenue	Current Rates	New Revenue
Customer charge					
0-999 KW	3,189	\$105.28	\$335,738	\$104.52	\$333,314
1001+ KW	420	\$720.07	\$302,429	\$714.85	\$300,237
Total	3,609		\$638,167		\$633,551
Facilities kW	2,292,298	\$3.049	\$6,989,217	\$3.027	\$6,938,786
Demand kWh					
Winter	1,278,306	\$3.039	\$3,884,772	\$3.017	\$3,856,649
Summer	578,645	\$6.577	\$3,805,748	\$6.529	\$3,777,973
Total	1,856,951		\$7,690,520		\$7,634,622
Energy					
Winter 1st	224,101,754	\$0.04842	\$10,851,007	\$0.04807	\$10,772,571
Winter 2nd	176,356,494	\$0.03021	\$5,327,730	\$0.02999	\$5,288,931
Winter 3rd	76,089,778	\$0.02481	\$1,887,787	\$0.02463	\$1,874,091
Total Winter kWh	476,548,026		\$18,066,524		\$17,935,594
Summer 1st	101,920,567	\$0.06923	\$7,055,961	\$0.06873	\$7,005,001
Summer 2nd	86,650,816	\$0.04947	\$4,286,616	\$0.04911	\$4,255,422
Summer 3rd	44,579,100	\$0.02829	\$1,261,143	\$0.02808	\$1,251,781
Total Summer kWh	233,150,483		\$12,603,719		\$12,512,203
Total Energy	709,698,509		\$30,670,243		\$30,447,797
Total Revenue			\$45,988,147		\$45,654,757

Large General Service at Secondary Voltage, Space Heating (Two Meters)					
LGSSH	KCPL WN Billing Units	Current Rates	Current Revenue	Current Rates	New Revenue
Customer charge					
0-999 KW	627	\$105.28	\$66,011	\$104.52	\$65,534
1001+ KW	57	\$720.07	\$41,044	\$714.85	\$40,746
Meter charge	684	\$2.32	\$1,587	\$2.30	\$1,573
Total	1,368		\$108,641		\$107,854
Facilities kW	323,905	\$3.049	\$987,586	\$3.027	\$980,460
Demand kWh					
Winter	179,141	\$3.339	\$598,152	\$3.315	\$593,852
Summer	82,196	\$6.577	\$540,603	\$6.529	\$536,658
Total	261,337		\$1,138,755		\$1,130,510
Energy					
Winter 1st	13,309,292	\$0.06939	\$923,532	\$0.06889	\$916,877
Winter 2nd	11,345,299	\$0.04216	\$478,318	\$0.04185	\$474,801
Winter 3rd	6,194,898	\$0.03150	\$195,139	\$0.03127	\$193,714
Total Winter kWh	30,849,489		\$1,596,989		\$1,585,392
Summer 1st	13,145,642	\$0.06923	\$910,073	\$0.06873	\$903,500
Summer 2nd	11,692,485	\$0.04947	\$578,427	\$0.04911	\$574,218
Summer 3rd	6,833,668	\$0.02829	\$193,324	\$0.02808	\$191,889
Total Summer kWh	31,671,795		\$1,681,824		\$1,669,607
Energy Charge	62,521,284		\$3,278,813		\$3,255,000
2nd Meter Heating					
Heat Winter	29,889,072	\$0.02481	\$741,548	\$0.02463	\$736,168
Heat Summer 1st			\$0		\$0
Heat Summer 2nd			\$0		\$0
TOTAL Heat kWh	29,889,072		\$741,548		\$736,168
Total Energy	92,410,356		\$4,020,361		\$3,991,168
Total Revenue			\$6,255,344		\$6,209,992

Large General Service at Primary Voltage					
LGSP	KCPL WN Billing Units	Current Rates	Current Revenue	Current Rates	New Revenue
Customer charge					
0-999 KW	276	\$105.28	\$29,057	\$104.52	\$28,848
1001+ KW	268	\$720.07	\$192,979	\$714.85	\$191,580
Total	544		\$222,036		\$220,427
Facilities kW	759,705	\$2.560	\$1,944,845	\$2.541	\$1,930,410
Demand kWh					
Winter	379,768	\$3.266	\$1,240,322	\$3.242	\$1,231,208
Summer	229,054	\$6.455	\$1,478,544	\$6.408	\$1,467,778
Total	608,822		\$2,718,866		\$2,698,986
Energy					
Winter 1st	66,094,283	\$0.06723	\$4,443,519	\$0.06674	\$4,411,132
Winter 2nd	58,806,961	\$0.04118	\$2,421,671	\$0.04088	\$2,404,029
Winter 3rd	39,799,007	\$0.03071	\$1,222,228	\$0.03049	\$1,213,472
Total Winter kWh	164,700,251		\$8,087,417		\$8,028,633
Summer 1st	40,186,691	\$0.06723	\$2,701,751	\$0.06674	\$2,682,060
Summer 2nd	34,442,571	\$0.04798	\$1,652,555	\$0.04763	\$1,640,500
Summer 3rd	25,120,914	\$0.02722	\$683,791	\$0.02702	\$678,767
Total Summer kWh	99,750,176		\$5,038,097		\$5,001,327
Total Energy	264,450,427		\$13,125,514		\$13,029,959
Total Revenue			\$18,011,261		\$17,879,783

Large General Service at Primary Voltage, All Electric (One Meter)					
LGSPA	KCPL WN Billing Units	Current Rates	Current Revenue	Current Rates	New Revenue
Customer charge					
0-999 KW	22	\$105.28	\$2,316	\$104.52	\$2,299
1001+ KW	12	\$720.07	\$8,641	\$714.85	\$8,578
Total	34		\$10,957		\$10,878
Facilities kW	40,374	\$2.560	\$103,357	\$2.541	\$102,590
Demand kWh					
Winter	26,293	\$2.983	\$78,432	\$2.961	\$77,854
Summer	11,525	\$6.455	\$74,394	\$6.408	\$73,852
Total	37,818		\$152,826		\$151,706
Energy					
Winter 1st	4,432,568	\$0.04714	\$208,951	\$0.04680	\$207,444
Winter 2nd	4,405,365	\$0.02921	\$128,681	\$0.02900	\$127,756
Winter 3rd	6,150,555	\$0.02404	\$147,859	\$0.02387	\$146,814
Total Winter kWh	14,988,488		\$485,491		\$482,014
Summer 1st	2,018,854	\$0.06723	\$135,728	\$0.06674	\$134,738
Summer 2nd	2,017,189	\$0.04798	\$96,785	\$0.04763	\$96,079
Summer 3rd	3,438,103	\$0.02722	\$93,585	\$0.02702	\$92,898
Total Summer kWh	7,474,146		\$326,097		\$323,715
Total Energy	22,462,634		\$811,589		\$805,728
Total Revenue			\$1,078,729		\$1,070,902

Large Power Service at Substation Voltage					
LPGSSS	KCPL WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
Customer charge	12	\$768.70	\$9,224	\$763.13	\$9,158
Facilities kW	42,254	\$0.812	\$34,310	\$0.806	\$34,057
Demand charge	0				
Winter	0				
First 2520 kw	20,041	\$7.601	\$152,332	\$7.546	\$151,229
Next 2520 kw	6,570	\$6.930	\$45,530	\$6.880	\$45,202
Next 2520 kw	0	\$5.371	\$0	\$5.332	
kw over 7560	0	\$4.133	\$0	\$4.103	\$0
Summer	0				
First 2520 kw	7,175	\$11.183	\$80,238	\$11.102	\$79,657
Next 2520 kw	2,191	\$10.445	\$22,885	\$10.369	\$22,718
Next 2520 kw	0	\$7.692	\$0	\$7.636	
kw over 7560	0	\$5.614	\$0	\$5.573	\$0
Total	35,977		\$300,985		\$298,806
Energy	0				
Winter 1st	4,827,875	\$0.05381	\$259,788	\$0.05342	\$257,905
Winter 2nd	4,559,688	\$0.03800	\$173,268	\$0.03772	\$171,991
Winter 3rd	5,167,904	\$0.02745	\$141,859	\$0.02725	\$140,825
Total Winter kWh	14,555,467		\$574,915		\$570,722
Summer 1st	1,434,562	\$0.05753	\$82,530	\$0.05711	\$81,928
Summer 2nd	1,130,616	\$0.03487	\$39,425	\$0.03462	\$39,142
Summer 3rd	1,167,416	\$0.02018	\$23,558	\$0.02003	\$23,383
Total Summer kWh	3,732,594		\$145,513		\$144,453
Total Energy	18,288,061		\$720,428		\$715,175
Total Revenue			\$1,064,948		\$1,057,196

Large Power Service at Transmission Voltage					
LPGSTR	KCPL WN Billing Units	Current Rates	Current Revenue	New Rates	New Revenue
Customer charge	12	\$768.70	\$9,224	\$763.13	\$9,158
Demand charge	0				
Winter	-				
First 2541 kw	20,057	\$7.533	\$151,089	\$7.478	\$149,986
Next 2541 kw	20,057	\$6.868	\$137,751	\$6.818	\$136,749
Next 2541 kw	20,057	\$5.341	\$107,124	\$5.302	\$106,342
Over 7623 kw	130,845	\$4.110	\$537,773	\$4.080	\$533,848
Summer	-				
First 2541 kw	10,435	\$11.083	\$115,651	\$11.003	\$114,816
Next 2541 kw	10,435	\$10.352	\$108,023	\$10.277	\$107,240
Next 2541 kw	10,435	\$7.648	\$79,807	\$7.593	\$79,233
Over 7623 kw	43,325	\$5.583	\$241,883	\$5.543	\$240,150
Total	265,646		\$1,479,103		\$1,468,365
Energy	-				
Winter 1st	34,704,870	\$0.05324	\$1,847,687	\$0.05285	\$1,834,152
Winter 2nd	31,300,112	\$0.03757	\$1,175,945	\$0.03730	\$1,167,494
Winter 3rd	3,515,428	\$0.02700	\$94,917	\$0.02680	\$94,213
Total Winter kWh	69,520,409		\$3,118,549		\$3,095,860
Summer 1st	13,423,787	\$0.05681	\$762,605	\$0.05640	\$757,102
Summer 2nd	13,423,787	\$0.03444	\$462,315	\$0.03419	\$458,959
Summer 3rd	8,815,761	\$0.01973	\$173,935	\$0.01959	\$172,701
Total Summer kWh	35,663,334		\$1,398,856		\$1,388,762
Total Energy	105,183,743		\$4,517,405		\$4,484,622
Total Revenue			\$6,005,732		\$5,962,144
Manual Bills					
Winter	2,130,143		\$146,139		145,079
Summer	529,417		\$51,141		50,770
Reactive Demand					
Winter	33,209	0.692	\$22,980	0.000	22,814
Summer	18,458	0.692	\$12,773	0.000	12,680
EDR Credit			(\$689,195)		(\$684,198)
All Classes Energy					
2,369,521,326	Customer Charge		\$2,177,198		\$2,161,453
	Meter Charge		\$1,587		\$1,573
	Facilities Charge		\$21,071,880		\$20,919,407
	Demand Charge		\$27,216,445		\$27,018,842
	Energy Charge		\$114,779,654		\$113,946,246
	Total billed revenue		\$164,790,601		\$163,594,667

Staff's Rate Design: Impact of Rates on Bills of Different Sizes

SUMMER

All Residential Subclasses Except For Time of Use Customers

	600	1000	1500	2000	3000	4000	5000
	kWh	kWh	kWh	kWh	kWh	kWh	kWh
OLD Rates	\$78.97	\$122.29	\$176.44	\$230.58	\$338.87	\$447.16	\$555.45
ECA = \$0.01631	\$9.79	\$16.31	\$24.47	\$32.62	\$48.93	\$65.24	\$81.55
EER = \$0.00000	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PTS = \$0.00047	\$0.28	\$0.47	\$0.71	\$0.94	\$1.41	\$1.88	\$2.35
TDC = \$0.00637	\$3.82	\$6.37	\$9.56	\$12.74	\$19.11	\$25.48	\$31.85
Total Bill	\$92.86	\$145.44	\$211.16	\$276.88	\$408.32	\$539.76	\$671.20
 NEW Rates	 \$78.43	 \$121.39	 \$175.09	 \$228.78	 \$336.17	 \$443.56	 \$550.95
ECA = \$0.01631	\$9.79	\$16.31	\$24.47	\$32.62	\$48.93	\$65.24	\$81.55
EER = \$0.00000	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PTS = \$0.00047	\$0.28	\$0.47	\$0.71	\$0.94	\$1.41	\$1.88	\$2.35
TDC = \$0.00637	\$3.82	\$6.37	\$9.56	\$12.74	\$19.11	\$25.48	\$31.85
Total Bill	\$92.32	\$144.54	\$209.81	\$275.08	\$405.62	\$536.16	\$666.70
 Change in \$	 (\$0.54)	 (\$0.90)	 (\$1.35)	 (\$1.80)	 (\$2.70)	 (\$3.60)	 (\$4.50)
% Change	-0.6%	-0.6%	-0.6%	-0.7%	-0.7%	-0.7%	-0.7%

WINTER							
RES-A: General Use							
	600 kWh	1000 kWh	1500 kWh	2000 kWh	3000 kWh	4000 kWh	5000 kWh
OLD Rates	\$64.17	\$97.61	\$139.42	\$181.22	\$264.83	\$348.44	\$432.05
ECA = \$0.01631	\$9.79	\$16.31	\$24.47	\$32.62	\$48.93	\$65.24	\$81.55
EER = \$0.00000	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PTS = \$0.00047	\$0.28	\$0.47	\$0.71	\$0.94	\$1.41	\$1.88	\$2.35
TDC = \$0.00637	\$3.82	\$6.37	\$9.56	\$12.74	\$19.11	\$25.48	\$31.85
Total Bill	\$78.06	\$120.76	\$174.14	\$227.52	\$334.28	\$441.04	\$547.80
 NEW Rates	 \$63.75	 \$96.92	 \$138.38	 \$179.84	 \$262.76	 \$345.68	 \$428.60
ECA = \$0.01631	\$9.79	\$16.31	\$24.47	\$32.62	\$48.93	\$65.24	\$81.55
EER = \$0.00000	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PTS = \$0.00047	\$0.28	\$0.47	\$0.71	\$0.94	\$1.41	\$1.88	\$2.35
TDC = \$0.00637	\$3.82	\$6.37	\$9.56	\$12.74	\$19.11	\$25.48	\$31.85
Total Bill	\$77.64	\$120.07	\$173.11	\$226.14	\$332.21	\$438.28	\$544.35
 Change in \$	 (\$0.41)	 (\$0.69)	 (\$1.04)	 (\$1.38)	 (\$2.07)	 (\$2.76)	 (\$3.45)
% Change	-0.5%	-0.6%	-0.6%	-0.6%	-0.6%	-0.6%	-0.6%

RES-C: General Use and Space Heat One Meter

	600 kWh	1000 kWh	1500 kWh	2000 kWh	3000 kWh	4000 kWh	5000 kWh
OLD Rates	\$59.17	\$89.29	\$122.17	\$155.04	\$220.79	\$286.54	\$352.29
ECA = \$0.01631	\$9.79	\$16.31	\$24.47	\$32.62	\$48.93	\$65.24	\$81.55
EER = \$0.00000	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PTS = \$0.00047	\$0.28	\$0.47	\$0.71	\$0.94	\$1.41	\$1.88	\$2.35
TDC = \$0.00637	\$3.82	\$6.37	\$9.56	\$12.74	\$19.11	\$25.48	\$31.85
Total Bill	\$73.06	\$112.44	\$156.89	\$201.34	\$290.24	\$379.14	\$468.04
 NEW Rates	 \$58.80	 \$88.67	 \$121.28	 \$153.88	 \$219.09	 \$284.30	 \$349.51
ECA = \$0.01631	\$9.79	\$16.31	\$24.47	\$32.62	\$48.93	\$65.24	\$81.55
EER = \$0.00000	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PTS = \$0.00047	\$0.28	\$0.47	\$0.71	\$0.94	\$1.41	\$1.88	\$2.35
TDC = \$0.00637	\$3.82	\$6.37	\$9.56	\$12.74	\$19.11	\$25.48	\$31.85
Total Bill	\$72.69	\$111.82	\$156.00	\$200.18	\$288.54	\$376.90	\$465.26
 Change in \$	 (\$0.37)	 (\$0.62)	 (\$0.89)	 (\$1.16)	 (\$1.70)	 (\$2.24)	 (\$2.78)
% Change	-0.5%	-0.6%	-0.6%	-0.6%	-0.6%	-0.6%	-0.6%

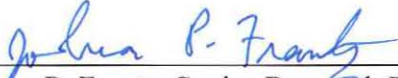
RES-D: General Use with Second Space Heating Meter

	600 kWh	1000 kWh	1500 kWh	2000 kWh	3000 kWh	4000 kWh	5000 kWh
OLD Rates	\$56.31	\$84.52	\$119.78	\$155.04	\$220.79	\$286.54	\$352.29
ECA = \$0.01631	\$9.79	\$16.31	\$24.47	\$32.62	\$48.93	\$65.24	\$81.55
EER = \$0.00000	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PTS = \$0.00047	\$0.28	\$0.47	\$0.71	\$0.94	\$1.41	\$1.88	\$2.35
TDC = \$0.00637	\$3.82	\$6.37	\$9.56	\$12.74	\$19.11	\$25.48	\$31.85
Total Bill	\$70.20	\$107.67	\$154.51	\$201.34	\$290.24	\$379.14	\$468.04
 NEW Rates	 \$55.96	 \$83.94	 \$118.91	 \$153.88	 \$219.09	 \$284.30	 \$349.51
ECA = \$0.01631	\$9.79	\$16.31	\$24.47	\$32.62	\$48.93	\$65.24	\$81.55
EER = \$0.00000	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PTS = \$0.00047	\$0.28	\$0.47	\$0.71	\$0.94	\$1.41	\$1.88	\$2.35
TDC = \$0.00637	\$3.82	\$6.37	\$9.56	\$12.74	\$19.11	\$25.48	\$31.85
Total Bill	\$69.85	\$107.09	\$153.64	\$200.18	\$288.54	\$376.90	\$465.26
 Change in \$	 (\$0.35)	 (\$0.58)	 (\$0.87)	 (\$1.16)	 (\$1.70)	 (\$2.24)	 (\$2.78)
% Change	-0.5%	-0.5%	-0.6%	-0.6%	-0.6%	-0.6%	-0.6%

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

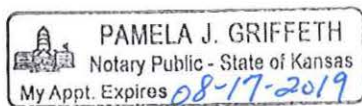
VERIFICATION

Joshua P. Frantz, being duly sworn upon his oath deposes and says that he is a Senior Research Economist for the State Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Direct Testimony* and that the statements contained therein are true and correct to the best of his knowledge, information and belief.



Joshua P. Frantz, Senior Research Economist
State Corporation Commission of the
State of Kansas

Subscribed and sworn to before me this 6th day of April, 2017.





Notary Public

My Appointment Expires: August 17, 2019

CERTIFICATE OF SERVICE

17-KCPE-201-RTS

I, the undersigned, certify that a true and correct copy of the above and foregoing Direct Testimony was served by electronic service on this 6th day of April, 2017, to the following:

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/s/ Pamela Griffeth

Pamela Griffeth
Administrative Specialist