BEFORE THE 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 Approval to Make Certain Changes in Their Charges for Electric Service	KCC Docket No. 12-WSEE-112-RTS

DIRECT TESTIMONY OF

BRIAN KALCIC

RE: RESIDENTIAL AND SMALL GENERAL SERVICE RATE STRUCTURE

ON BEHALF OF

THE CITIZENS' UTILITY RATEPAYER BOARD

January 5, 2012

Q. Please state your name and business address.

A. Brian Kalcic, 225 S. Meramec Avenue, St. Louis, Missouri 63105.

Q. What is your occupation?

A. I am an economist and consultant in the field of public utility regulation, and principal of Excel Consulting. My qualifications are described in the Appendix to this testimony.

Q. On whose behalf are you testifying in this case?

A. I am testifying on behalf of the Citizens' Utility Ratepayer Board ("CURB").

Q. What is the subject of your testimony?

A. I will review the class revenue allocation and residential rate structure proposals sponsored by Westar Energy, Inc. and Kansas Gas and Electric Company (collectively "Westar" or the "Company"). Consistent with CURB's policy position regarding conservation, I will also sponsor a more conservation-oriented residential rate structure to be implemented at the conclusion of this proceeding.

In addition, I will discuss the Company's proposed Small General Service ("SGS") rate structure, and sponsor conservation-oriented changes, where appropriate.

Q. Have you reflected CURB witness Andrea C. Crane's recommended revenue adjustment for Westar in your alternative rate design proposals?

A. Yes, I have.

Q. Please summarize your primary recommendations.

A. Based upon my analysis of Westar's filing and interrogatory responses, I recommend that the Kansas Corporation Commission ("KCC" or "Commission"):

- reject the Company's proposed residential rate design;
- adopt CURB's revised residential rate design which would provide a stronger conservation price signal to Westar's residential customers;
- reject Westar's proposed SGS rate design; and
- adopt CURB's revised SGS rate design which would phase-out the Company's existing SGS declining block energy charges.

The specific details associated with the above recommendations are discussed below.

Class Revenue Allocation

Q. Mr. Kalcic, how does Westar propose to recover its requested base revenue increase of $90.8 million from ratepayers?

A. Schedule BK-1 provides a summary of the Company's proposed revenue allocation. As shown on line 7 of Schedule BK-1, the Company's overall proposed increase in *base* revenues is 8.9%.[1] The proposed base rate increases assigned to individual classes range from 3.8% (for Lighting Service) to 11.0% (for SGS).

Q. How did the Company arrive at the proposed class revenue allocation shown in Schedules BK-1?

[1] Schedule BK-1 excludes Retail Energy Cost Adjustment ("RECA"), Transmission Delivery Charge ("TSC"), Environmental Cost Recovery Rider ("ECRR"), Property Tax Surcharge ("PTS") and Energy Efficiency Rider ("EER") revenues.

A. The Company states that its objective "is to move class rates of return closer to the average rate of return using a four Coincident Peak (4CP) allocation study."[2] According to the Company, Exhibit PHR-2 shows that class rates of return have been moved closer to the system average, thereby eliminating certain interclass subsidies.[3]

Q. Mr. Kalcic, are you sponsoring any changes to the Company's proposed revenue allocation and/or cost-of-service study ("COSS") methodology in this proceeding?

A. No. However, I am advised by CURB's Consumer Counsel that the KCC has not adopted the Company's preferred 4CP cost allocation methodology. To the extent that Westar's proposed class revenue allocation is based upon the results of its 4CP COSS, the Company's class revenue allocation may need to be modified in order to comport with a KCC-approved cost allocation methodology.

Q. Have you nevertheless reflected Westar's proposed residential and SGS class increases to illustrate CURB's specific rate design proposals in this proceeding?

A. Yes, I have.

Residential Rate Structure

Q. Mr. Kalcic, please provide a brief description of Westar's current residential service rate schedules.

A. The Company serves residential customers via three (3) rate schedules: 1) Standard Service, 2) Restricted Conservation Use Service and 3) Restricted Peak Management

[2] See Mr. Rohlf's Direct Testimony at page 23.
[3] See Mr. Raab's Direct Testimony at page 27.

Service.[4] The vast majority of Westar's customers (97.5%) take Standard Service. The Standard Service rate schedule contains a customer charge, a declining-block winter energy charge, and an inclining-block summer energy charge. The Restricted Conservation Use Service rate schedule contains a customer charge and a flat-rate energy charge that is not seasonally differentiated. The Restricted Peak Management Service rate schedule is intended to provide customers with the opportunity to lower their total monthly bill by managing their peak usage. The rate contains a customer charge, a flat-rate energy charge and a demand charge, with the latter seasonally differentiated.

Q. Does the Company propose to revise its residential rate *structure* in this proceeding?

A. In part. Westar is proposing to implement a Time of Use ("TOU") Service rate schedule for 1,000 residential customers on a pilot basis. The TOU rate schedule is designed to incent customers to shift consumption from peak to off-peak time periods, where energy costs are lower. The objective of the pilot program is to reduce both customer bills and Westar's peak demand.[5]

However, with respect to the Company's existing residential rate schedules, Westar's proposed residential rate design is restricted to changes to the levels of its current tariff charges.

Q. Does CURB support the Company's proposed TOU pilot?

[4] Restricted Conservation Use Service and Restricted Peak Management Service is closed to new customers.
[5] The pilot program would be effective for three (3) years or until the TOU rate is modified or terminated by the KCC.

A. Yes, in its pilot form. However, CURB reserves its right to support or oppose the proposed TOU rate, as appropriate, prior to its adoption on a permanent basis.

Q. Have you provided a summary of the Company's proposed residential rate design?

A. Yes, I have. The Company's present and proposed residential base rate tariff charges are summarized in Schedule BK-2. As shown in column 3 of Schedule BK-2, the Company is proposing to assign a uniform increase of approximately $0.006050 per kWh across all of its existing Standard Service rate blocks. As a result, the Company's proposed rate design would effectively maintain the existing rate differentials (across rate blocks), in both winter and summer.

Q. Does CURB agree with the Company's proposed residential rate design in this proceeding?

A. No. As I discuss below, CURB recommends that the Company's residential rate design be revised to mitigate the rate impacts on small users and to provide stronger price signals to consumers to conserve electricity. Accordingly, I have prepared an alternative residential rate design for the Commission's consideration in this proceeding.

Q. Why does CURB believe that it is appropriate to move toward a more conservation-oriented residential rate structure in this case?

A. CURB's Consumer Counsel informs me that the Commission has the authority to adjust utility rate structures to accomplish desired goals such as conservation. As a matter of public policy, it is CURB's position that the Commission can, and should, encourage

conservation by revising existing rate structures to provide stronger conservation-oriented price signals. Many Kansas electric utilities are currently adding and improving generation facilities and undertaking massive capital expenditures to serve growing demand. Greater conservation, if achieved, will help consumers manage rising electric utility bills in the coming years and delay the need for additional generation units.

Q. Couldn't a significant revision to Westar's existing rate structure exacerbate the rate increases that will be experienced by certain residential customers?

A. Yes. CURB is cognizant of that possibility. In its comments to the Commission in Docket No. 08-GIMX-442-GIV, CURB stated, in pertinent part:

> [W]ith respect to rate impacts on consumers that may result from adjusting the current rate structure or from moving to real-time pricing, the Commission must also be an active participant in the creation of mechanisms or rate structures that protect the most vulnerable of our citizens. . . . CURB encourages the Commission to join with CURB, the utilities and other intervenors, where appropriate, in finding mechanisms to make sure there are rate protections and affordability programs for our low-income and fixed-income customers. For example, rate design should ensure that the first block of usage remains affordable for all customers. Rate blocks above this first block can be adjusted upward, if necessary.[6]

In other words, CURB finds that an appropriate residential rate design would encourage conservation while at the same time providing a measure of affordability over a "first block" or baseline level of customer usage. Usage in excess of the baseline level would be subject to significantly greater pricing for all customers.

[6] *Comments of the Citizens' Utility Ratepayer Board*, Dec. 21, 2007, pp. 7-8, KCC Docket No, 08-GIMX-442-GIV.

Q. Mr. Kalcic, which specific feature(s) of the Company's existing residential rate structure does CURB wish to address at this time?

A. CURB opposes the Company's existing declining-block energy charges, which are applicable to Standard Service customers during the winter season. As currently configured, the Company's tariff provides a 1.1847¢ per kWh discount for increased consumption, beginning with the 901st kWh consumed by a customer during the winter. That discount encourages rather than discourages consumption, and thus sends the wrong price signal to customers.

CURB also takes issue with the Company's proposal to leave the absolute magnitude of the existing inclining-block rate differential in the summer months unchanged. In CURB's view, that rate differential should be increased in this proceeding in order to provide customers with a stronger conservation price signal during the summer.

Q. Does CURB recommend eliminating Westar's declining-block winter rates in this proceeding?

A. No. As I discuss below, CURB's recommended rate design would eliminate 50% of the existing winter rate discount. CURB recommends eliminating the remaining winter rate discount in Westar's next base rate proceeding.

Q. Have you prepared a revised residential rate design and proof of revenue for this proceeding?

A. Yes, I have. Schedule BK-3 illustrates CURB's recommended residential rate design at the Company's overall requested revenue requirement. Schedule BK-4 illustrates CURB's recommended residential rate design at CURB's recommended revenue requirement level.

Q. Please describe Schedule BK-3.

A. Schedule BK-3 consists of eight (8) columns. Columns 1 and 2 contain the pro forma residential billing determinants proposed by Westar and CURB.[7] Column 3 contains the Company's present base rates. Column 4 shows the present revenue that is derived from multiplying the pro forma billing determinants in column 2 by the present rates shown in column 3. CURB's revised rates are shown in column 5, and its revised revenue is provided in column 6. Column 7 shows the percentage change in rates under CURB's recommended rate design. Finally, column 8 presents CURB's revised residential base rates after rolling in the Company's current ECRR, as recommended by Ms. Crane.

As shown on line 17, columns 6-7 of Schedule BK-3, CURB's recommended rate design would produce total residential base rate revenues of $484.7 million, which equates to a base rate increase of 10.64%.

Q. How did you determine the level of the residential base rate increase shown in line 17 of Schedule BK-3?

A. The overall residential base rate increase shown in Schedule BK-3 is the same as that proposed by Westar.

[7] Since CURB is not sponsoring any revenue adjustment in this proceeding, the pro forma billing determinants shown in columns 1 and 2 of Schedule BK-3 are identical.

Q. How do CURB's illustrative residential rates shown in Schedule BK-3 compare to the Company's proposed rates?

A. CURB's revised residential rate design adopts all of the Company's proposed non-usage-related charges, along with Westar's proposed energy charges for Restricted Conservation Use Service and Restricted Peak Management Service. However, as shown in column 5, lines 6-11 of Schedule BK-3, CURB's revised Standard Service usage rates would:

- eliminate 50% of the existing discount for winter usage in excess of 900 kWh per month (i.e., reduce the discount from 1.1847¢ per kWh to 0.5924¢ per kWh); and
- increase the applicable summer rate differential for usage in excess of 900 kWh per month (from 1.3348¢ per kWh to 1.9384¢ per kWh).

Q. How did you determine the percentage increase to be assigned to the summer rate block applicable to Standard Service customers using in excess of 900 kWh per month (i.e., line 8, column 7 of Schedule BK-3)?

A. CURB's recommended rate design is intended to provide a stronger conservation price signal than Westar's proposed rate design during the summer months. Accordingly, CURB recommends increasing the current summer rate differential to produce a summer tail block rate that is approximately 1.30 times the rate applicable to the first 900 kWh of usage during the summer (inclusive of the ECRR roll-in). Since the existing price ratio across the summer rate blocks is only 1.22 (inclusive of the ECRR roll-in), CURB's recommended rate design would strengthen the conservation signal inherent in Westar's Standard Service rates.

Q. How would the illustrative rate block increases shown on lines 8 and 11 of Schedule BK-3 be affected if the KCC were to award Westar a base rate increase less than $90.8 million?

A. In that event, the resulting rate block increases would be smaller than those shown in Schedule BK-3.

Q. Would it be possible to mitigate the rate block increases shown on lines 8 and 11 of Schedule BK-3 *at a given revenue requirement level*, while at the same time fully implementing CURB's recommended rate design approach?

A. Yes. All else equal, the greater the customer charge increase shown in line 1 of Schedule BK-3, the smaller the required usage charge increases shown in lines 6-11 of Schedule BK-3. Westar is proposing an applicable residential customer charge increase of $1 per month. CURB's Consumer Counsel informs me that CURB would not oppose a greater increase to residential customer charges, if such an increase were necessary to implement CURB's recommended residential rate design.

Q. Did you prepare a similar revised rate design and proof of revenue for residential customers at CURB's recommended revenue requirement level?

A. Yes, in Schedule BK-4.

Q. Does the alternative rate design shown in Schedule BK-4 reflect the previously discussed rate design recommendations advocated by CURB?

A. Yes. In particular, the illustrative rate design shown in Schedule BK-4 would:

- eliminate 50% of the existing discount for winter usage in excess of 900 kWh per month; and
- increase the applicable summer rate differential for Standard Service customers using in excess of 900 kWh per month to produce a summer tail block rate that is approximately 1.30 times the rate applicable to the first 900 kWh of usage during the summer (inclusive of the ECRR roll-in).

Q. How did you determine the level of the residential base rate decrease shown in line 17 of Schedule BK-4?

A. Ms. Crane is recommending a total Westar base rate decrease of $11.6 million (exclusive of the ECRR roll-in) on total base revenues of $1,018.2 million, or a decrease of 1.1%. To obtain the required residential decrease, I multiplied 1.1% by 0.81 (the "inverse" of the Company's proposed relative residential *increase* of 1.19 shown on line 1 of Schedule BK-1), to arrive at a target residential decrease of approximately 0.9%.

Q. Mr. Kalcic, would you please summarize CURB's rate design recommendations for the Company's residential Standard Service rate class?

A. Yes. CURB recommends that the Commission direct Westar to:

- eliminate 50% of the existing Standard Service discount for winter usage in excess of 900 kWh per month; and
- increase the applicable summer rate differential for Standard Service customers using in excess of 900 kWh per month to produce a summer tail block rate that is

approximately 1.30 times the rate applicable to the first 900 kWh of usage during the summer (inclusive of the ECRR roll-in)

SGS Rate Structure

Q. Mr. Kalcic, please provide a brief description of the Company's current SGS rate schedule(s).

A. The Company maintains one (1) SGS rate schedule that contains a customer charge, a seasonally-differentiated demand charge and a non-seasonally differentiated, declining block energy charge (with a breakpoint at 1,200 kWh per month of usage).

Q. Does the Company propose to revise its SGS rate structure in this proceeding?

A. No, it does not. In particular, the Company proposes to retain the current declining-block energy charge applicable to SGS service.

Q. Does CURB accept the Company's proposed SGS rate design in this proceeding?

A. No. CURB opposes the Company's declining block SGS rate structure since it does not promote conservation.

Q. Does CURB recommend eliminating Westar's declining-block SGS energy charges in this proceeding?

A. No. As I discuss below, CURB's recommended rate design would eliminate 50% of the existing SGS declining-block rate discount. CURB recommends eliminating the remaining rate discount in Westar's next base rate proceeding.

Q. Have you prepared a revised SGS rate design and proof of revenue for this proceeding?

A. Yes, I have. Schedule BK-5 illustrates CURB's recommended SGS rate design at the Company's overall requested revenue requirement. Schedule BK-6 illustrates CURB's recommended SGS rate design at CURB's recommended revenue requirement level.

Q. Please discuss Schedule BK-5.

A. Schedule BK-5 uses the same format as Schedules BK-3 and 4, with CURB's illustrative SGS rates shown in column 5. CURB's revised rate design adopts all of the Company's proposed non-usage charges. However, as shown in column 5, lines 7-8 of Schedule BK-5, CURB's revised rate design would eliminate 50% of the existing SGS declining-block rate discount.

Q. How did you determine the level of the SGS base rate increase shown in line 17 of Schedule BK-5?

A. The overall SGS base rate increase shown in Schedule BK-5 is the same as that proposed by Westar.

Q. Did you prepare a similar revised rate design and proof of revenue for SGS customers at CURB's recommended revenue requirement level?

A. Yes, in Schedule BK-6.

Q. Does the illustrative rate design shown in Schedule BK-6 reflect the previously-discussed SGS rate design approach advocated by CURB?

A. Yes. More specifically, the illustrative rate design shown in Schedule BK-6 would eliminate 50% of the existing SGS declining-block rate discount (as in Schedule BK-5).

Q. How did you determine the level of the SGS base rate decrease shown in line 17 of Schedule BK-6?

A. As previously discussed, Ms. Crane is recommending a total Westar South base rate decrease of $11.6 million, or a decrease of 1.1%. To obtain the required SGS decrease, I multiplied 1.1% by 0.77 (the "inverse" of the Company's proposed relative SGS *increase* of 1.23 shown on line 2 of Schedule BK-1), to arrive at a target SGS decrease of approximately 0.8%.

Q. Does this conclude your direct testimony?

A. Yes.

VERIFICATION

STATE OF MISSOURI)
) ss:
COUNTY OF ST. LOUIS)

I, Brian Kalcic, of lawful age, being first duly sworn upon his oath states:

That he is a consultant for the Citizens' Utility Ratepayer Board; that he has read the above and foregoing Testimony, and, upon information and belief, states that the matters therein appearing are true and correct.

Brian Kalcic

SUBSCRIBED AND SWORN to before me this 3rd day of January, 2012.

Notary of Public

My Commission expires:

" NOTARY SEAL"
Janet M. Roseman, Notary Public
St. Louis County, State of Missouri
My Commission Expires 8/10/2014
Commission Number 10429986

APPENDIX

Qualifications of Brian Kalcic

Mr. Kalcic graduated from Benedictine University with a Bachelor of Arts degree in Economics in December 1974. In May 1977 he received a Master of Arts degree in Economics from Washington University, St. Louis. In addition, he has completed all course requirements at Washington University for a Ph.D. in Economics.

From 1977 to 1982, Mr. Kalcic taught courses in economics at both Washington University and Webster University, including Microeconomic and Macroeconomic Theory, Labor Economics and Public Finance.

During 1980 and 1981, Mr. Kalcic was a consultant to the Equal Employment Opportunity Commission, St. Louis District Office. His responsibilities included data collection and organization, statistical analysis and trial testimony.

From 1982 to 1996, Mr. Kalcic was employed by the firm of Cook, Eisdorfer & Associates, Inc. During that time, he participated in the analysis of electric, gas and water utility rate case filings. His primary responsibilities included cost-of-service and economic analysis, model building, and statistical analysis.

In March 1996, Mr. Kalcic founded Excel Consulting, a consulting practice that offers business and regulatory analysis.

Mr. Kalcic has previously testified before the state regulatory commissions of Delaware, Kansas, Kentucky, Maine, Massachusetts, Minnesota, Missouri, New Jersey, New York, Ohio, Oregon, Pennsylvania, and Texas, and also before the Bonneville Power Administration.

SCHEDULES BK-1 THROUGH BK-6

WESTAR ENERGY, INC.

Company Proposed Allocation of its
Requested Increase in Total Base Rate Revenue
(Test Year Ended March 31, 2011)

Line	Cost-of-Service Class	Present Base Revenue 1/	Proposed Increase		
			Amount	Percent	Relative
		1	2	3	4
1	Residential	$438,039,699	$46,624,575	10.6%	119
2	Small General Service	$209,724,520	$23,018,489	11.0%	123
3	Medium General Service	$173,485,632	$9,587,462	5.5%	62
4	Public Schools	$28,224,147	$1,519,087	5.4%	60
5	HLF Service	$149,787,728	$9,362,657	6.3%	70
6	Lighting Service	$18,907,058	$721,492	3.8%	43
7	Total Retail	$1,018,168,784	$90,833,762	8.9%	100

Source: KCC 139

Note:
1/ Excludes RECA, TSC, ECRR, PTS and EER.

Schedule BK-2

WESTAR ENERGY, INC.

Summary of Present and Proposed Residential Tariff Charges

Line	Description	Present Rates* (1)	Proposed Rates* (2)	Proposed Increase Amount (3)	Proposed Increase Percent (4)
1	Customer Charge	$8.00	$9.00	$1.00	12.50%
	Standard Service				
	Usage Charge				
	Winter				
2	First 500 kWh	$0.057743	$0.063793	$0.006050	10.48%
3	Next 400 kWh	$0.057743	$0.063793	$0.006050	10.48%
4	All add'l kWh	$0.045896	$0.051941	$0.006045	13.17%
	Summer				
5	First 500 kWh	$0.057743	$0.063793	$0.006050	10.48%
6	Next 400 kWh	$0.057743	$0.063793	$0.006050	10.48%
7	All add'l kWh	$0.071091	$0.077139	$0.006048	8.51%
	Restricted Cons. Service				
	Usage Charge				
	Winter				
8	First 500 kWh	$0.037772	$0.041795	$0.004023	10.65%
9	Next 400 kWh	$0.037772	$0.041795	$0.004023	10.65%
10	All add'l kWh	$0.037772	$0.041795	$0.004023	10.65%
	Summer				
11	First 500 kWh	$0.037772	$0.041795	$0.004023	10.65%
12	Next 400 kWh	$0.037772	$0.041795	$0.004023	10.65%
	Peak Management				
13	Customer Charge	$10.00	$11.00	$1.00	10.00%
	Usage Charge				
14	Winter	$0.033040	$0.038034	$0.004994	15.12%
15	Summer	$0.033040	$0.038034	$0.004994	15.12%
	Demand Charge				
16	Winter	$1.65	$1.75	$0.10	6.06%
17	Summer	$5.45	$5.80	$0.35	6.42%

* Excludes RECA, TSC, ECRR, PTS and EER.

WESTAR ENERGY, INC.

CURB Revised Residential Rate Design and Proof of Revenue
Standard / Conservation / Peak Management Service
Basis: WEI Requested Revenue Increase

Line	Description	ProForma Billing Determinants Per Company	ProForma Billing Determinants Per CURB	Present Rates	Present Revenue	Revised Rates 1/	Revised Revenue	Percentage Change in Rates	Revised Rates w/ ECRR Roll-in 2/
		(1)	(2)	(3)	(4) = (2)*(3)	(5)	(6) = (2)*(5)	(7) = (5)/(3)	(8)
	Non-Usage Charges								
1	Customer	7,068,653	7,068,653	$8.00	$56,549,224	$9.00	$63,617,877	12.50%	$9.00
2	Customer - PM	113,656	113,656	$10.00	$1,136,560	$11.00	$1,250,216	10.00%	$11.00
3	PM Demand - W	896,530	896,530	$1.65	$1,479,275	$1.75	$1,568,928	6.06%	$1.75
4	PM Demand - S	389,662	389,662	$5.45	$2,123,658	$5.80	$2,260,040	6.42%	$5.80
5	Subtotal				$61,288,717		$68,697,061		
	Usage Charges								
	Standard Service								
	Winter								
6	1st 500 kWh	1,842,444,796	1,842,444,796	$0.057743	$106,388,290	$0.061860	$113,973,635	7.13%	$0.065695
7	Next 400 kWh	813,519,540	813,519,540	$0.057743	$46,975,059	$0.061860	$50,324,319	7.13%	$0.065695
8	All add'l kWh	851,333,732	851,333,732	$0.045896	$39,072,813	$0.055936	$47,620,204	21.88%	$0.059771
	Summer								
9	1st 500 kWh	993,264,502	993,264,502	$0.057743	$57,354,072	$0.061860	$61,443,342	7.13%	$0.065695
10	Next 400 kWh	654,140,362	654,140,362	$0.057743	$37,772,027	$0.061860	$40,465,123	7.13%	$0.065695
11	All add'l kWh	1,151,861,849	1,151,861,849	$0.071091	$81,887,011	$0.081408	$93,770,769	14.51%	$0.085243
12	Subtotal Standard	6,306,564,781	6,306,564,781		$369,449,272		$407,597,392		
	Restricted Cons. Service								
13	All kWh	21,099,806	21,099,806	$0.037772	$796,982	$0.041795	$881,866	10.65%	$0.045630
14	Subtotal Conserv.	21,099,806	21,099,806		$796,982		$881,866		
	Peak Management								
15	All kWh	196,874,386	196,874,386	$0.033040	$6,504,730	$0.038034	$7,487,920	15.12%	$0.041869
16	Subtotal Peak Man.				$6,504,730		$7,487,920		
17	Total Residential	6,524,538,973	6,524,538,973		$438,039,701		$484,664,239	10.64%	
		Source: CURB DR 139				Target	$484,664,276		
						Rounding	($37)		

Note:
1/ Excludes RECA, TSC, ECRR, PTS and EER.
2/ Includes ECRR roll-in of $0.003835 per kWh.

WESTAR ENERGY, INC.

CURB Revised Residential Rate Design and Proof of Revenue
Standard / Conservation / Peak Management Service
Basis: CURB Recommended Revenue Increase

Line	Description	ProForma Billing Determinants Per Company	ProForma Billing Determinants Per CURB	Present Rates	Present Revenue	Revised Rates 1/	Revised Revenue	Percentage Change in Rates	Revised Rates w/ ECRR Roll-in 2/
		(1)	(2)	(3)	(4) = (2)*(3)	(5)	(6) = (2)*(5)	(7) = (5)/(3)	(8)
	Non-Usage Charges								
1	Customer	7,068,653	7,068,653	$8.00	$56,549,224	$9.00	$63,617,877	12.50%	$9.00
2	Customer - PM	113,656	113,656	$10.00	$1,136,560	$11.00	$1,250,216	10.00%	$11.00
3	PM Demand - W	896,530	896,530	$1.65	$1,479,275	$1.75	$1,568,928	6.06%	$1.75
4	PM Demand - S	389,662	389,662	$5.45	$2,123,658	$5.80	$2,260,040	6.42%	$5.80
5	Subtotal				$61,288,717		$68,697,061		
	Usage Charges								
	Standard Service								
	Winter								
6	1st 500 kWh	1,842,444,796	1,842,444,796	$0.057743	$106,388,290	$0.054413	$100,252,949	-5.77%	$0.058248
7	Next 400 kWh	813,519,540	813,519,540	$0.057743	$46,975,059	$0.054413	$44,266,039	-5.77%	$0.058248
8	All add'l kWh	851,333,732	851,333,732	$0.045896	$39,072,813	$0.048489	$41,280,321	5.65%	$0.052324
	Summer								
9	1st 500 kWh	993,264,502	993,264,502	$0.057743	$57,354,072	$0.054413	$54,046,501	-5.77%	$0.058248
10	Next 400 kWh	654,140,362	654,140,362	$0.057743	$37,772,027	$0.054413	$35,593,740	-5.77%	$0.058248
11	All add'l kWh	1,151,861,849	1,151,861,849	$0.071091	$81,887,011	$0.072037	$82,976,672	1.33%	$0.075872
12	Subtotal Standard	6,306,564,781	6,306,564,781		$369,449,272		$358,416,222		
	Restricted Cons. Service								
13	All kWh	21,099,806	21,099,806	$0.037772	$796,982	$0.036740	$775,209	-2.73%	$0.040575
14	Subtotal Conserv.	21,099,806	21,099,806		$796,982		$775,209		
	Peak Management								
15	All kWh	196,874,386	196,874,386	$0.033040	$6,504,730	$0.031104	$6,123,581	-5.86%	$0.034939
16	Subtotal Peak Man.				$6,504,730		$6,123,581		
17	Total Residential	6,524,538,973	6,524,538,973		$438,039,701		$434,012,073	-0.92%	
	Source: CURB DR 139					Target	$434,012,003		
						Rounding	$70		

Note:
1/ Excludes RECA, TSC, ECRR, PTS and EER.
2/ Includes ECRR roll-in of $0.003835 per kWh.

WESTAR ENERGY, INC.

CURB Revised SGS Rate Design and Proof of Revenue
Standard / Lighting / Unmetered / Church Option
Basis: WEI Requested Revenue Increase

Line	Description	ProForma Billing Determinants Per Company	ProForma Billing Determinants Per CURB	Present Rates	Present Revenue	Revised Rates 1/	Revised Revenue	Percentage Change in Rates	Revised Rates w/ ECRR Roll-in 2/
		(1)	(2)	(3)	(4) = (2)*(3)	(5)	(6) = (2)*(5)	(7) = (5)/(3)	(8)
	Non-Usage Charges								
1	Customer	999,094	999,094	$16.00	$15,985,504	$19.00	$18,982,786	18.75%	$19.00
2	Std. Demand - W	4,768,444	4,768,444	$3.50	$16,689,554	$3.80	$18,120,087	8.57%	$3.80
3	Std. Demand - S	5,275,252	5,275,252	$7.00	$36,926,764	$7.25	$38,245,577	3.57%	$7.25
4	C.O. Demand - W	1,750	1,750	$1.10	$1,925	$1.20	$2,100	9.09%	$1.20
5	C.O. Demand - S	340	340	$2.15	$731	$2.30	$782	6.98%	$2.30
6	Subtotal				$69,604,478		$75,351,332		
	Usage Charges								
	Standard Service								
7	1st 1,200 kWh	676,698,136	676,698,136	$0.055124	$37,302,308	$0.051885	$35,110,483	-5.88%	$0.054964
8	All add'l kWh	2,836,133,300	2,836,133,300	$0.035196	$99,820,548	$0.041921	$118,893,544	19.11%	$0.045000
9	Subtotal Standard	3,512,831,436	3,512,831,436		$137,122,856		$154,004,027		
	Recreational Lighting								
10	All kWh	8,437,923	8,437,923	$0.066323	$559,628	$0.072865	$614,829	9.86%	$0.075944
11	Subtotal Lighting	8,437,923	8,437,923		$559,628		$614,829		
	Unmetered Service								
12	1st 1,200 kWh	105,042	105,042	$0.055124	$5,790	$0.051885	$5,450	-5.88%	$0.054964
13	All add'l kWh	81,252	81,252	$0.035196	$2,860	$0.041921	$3,406	19.11%	
14	Subtotal Unmetered	186,294	186,294		$8,650		$8,856		
	Church Option								
15	1st 1,200 kWh	62,608	62,608	$0.055124	$3,451	$0.051885	$3,248	-5.88%	$0.054964
16	All add'l kWh	86,019	86,019	$0.035196	$3,028	$0.041921	$3,606	19.11%	$0.045000
17	Subtotal Church Op.	148,627	148,627		$6,479		$6,854		
18	Total SGS	3,521,604,280	3,521,604,280		$207,302,091		$229,985,898	10.94%	
	Source: CURB DR 139					Target	$229,987,762		
						Rounding	($1,864)		

Note:
1/ Excludes RECA, TSC, ECRR, PTS and EER.
2/ Includes ECRR roll-in of $0.003079 per kWh.

WESTAR ENERGY, INC.

CURB Revised SGS Rate Design and Proof of Revenue
Standard / Lighting / Unmetered / Church Option
Basis: CURB Recommended Revenue Increase

Line	Description	ProForma Billing Determinants Per Company	ProForma Billing Determinants Per CURB	Present Rates	Present Revenue	Revised Rates 1/	Revised Revenue	Percentage Change in Rates	Revised Rates w/ ECRR Roll-in 2/
		(1)	(2)	(3)	(4) = (2)*(3)	(5)	(6) = (2)*(5)	(7) = (5)/(3)	(8)
	Non-Usage Charges								
1	Customer	999,094	999,094	$16.00	$15,985,504	$19.00	$18,982,786	18.75%	$19.00
2	Std. Demand - W	4,768,444	4,768,444	$3.50	$16,689,554	$3.80	$18,120,087	8.57%	$3.80
3	Std. Demand - S	5,275,252	5,275,252	$7.00	$36,926,764	$7.25	$38,245,577	3.57%	$7.25
4	C.O. Demand - W	1,750	1,750	$1.10	$1,925	$1.20	$2,100	9.09%	$1.20
5	C.O. Demand - S	340	340	$2.15	$731	$2.30	$782	6.98%	$2.30
6	Subtotal				$69,604,478		$75,351,332		
	Usage Charges								
	Standard Service								
7	1st 1,200 kWh	676,698,136	676,698,136	$0.055124	$37,302,308	$0.044938	$30,409,461	-18.48%	$0.048017
8	All add'l kWh	2,836,133,300	2,836,133,300	$0.035196	$99,820,548	$0.034974	$99,190,926	-0.63%	$0.038053
9	Subtotal Standard	3,512,831,436	3,512,831,436		$137,122,856		$129,600,387		
	Recreational Lighting								
10	All kWh	8,437,923	8,437,923	$0.066323	$559,628	$0.061319	$517,405	-7.54%	$0.064398
11	Subtotal Lighting	8,437,923	8,437,923		$559,628		$517,405		
	Unmetered Service								
12	1st 1,200 kWh	105,042	105,042	$0.055124	$5,790	$0.044938	$4,720	-18.48%	$0.048017
13	All add'l kWh	81,252	81,252	$0.035196	$2,860	$0.034974	$2,842	-0.63%	
14	Subtotal Unmetered	186,294	186,294		$8,650		$7,562		
	Church Option								
15	1st 1,200 kWh	62,608	62,608	$0.055124	$3,451	$0.044938	$2,813	-18.48%	$0.048017
16	All add'l kWh	86,019	86,019	$0.035196	$3,028	$0.034974	$3,008	-0.63%	$0.038053
17	Subtotal Church Op.	148,627	148,627		$6,479		$5,821		
18	Total SGS	3,521,604,280	3,521,604,280		$207,302,091		$205,482,507	-0.88%	
	Source: CURB DR 139					Target	$205,483,171		
						Rounding	($664)		

Note:
1/ Excludes RECA, TSC, ECRR, PTS and EER.
2/ Includes ECRR roll-in of $0.003079 per kWh.

CERTIFICATE OF SERVICE

12-WSEE-112-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, electronic service, or hand-delivered this 5th day of January, 2012, to the following:

KEVIN K. LACHANCE
OFFICE OF STAFF JUDGE ADVOCATE
HQ, 1ST INFANTRY DIVISION & FORT RILEY
BUILDING 200, PATTON HALL
FORT RILEY, KS 66442-5017

MICHAEL E. AMASH, ATTORNEY
BLAKE & UHLIG PA
SUITE 475 NEW BROTHERHOOD BLDG
753 STATE AVE.
KANSAS CITY, KS 66101

KURT J. BOEHM, ATTORNEY
BOEHM, KURTZ & LOWRY
36 EAST SEVENTH STREET, SUITE 1510
CINCINNATI, OH 45202

JODY M. KYLER, ATTORNEY
BOEHM, KURTZ & LOWRY
36 EAST SEVENTH STREET, SUITE 1510
CINCINNATI, OH 45202

KEVIN HIGGINS
ENERGY STRATEGIES, LLC
PARKSIDE TOWERS
STE 200 215 S STATE ST
SALT LAKE CITY, UT 84111

PAUL LIRA, BUSINESS MANAGER
IBEW LOCAL UNION NO. 304
3906 NW 16TH STREET
TOPEKA, KS 66615

JOHN R. WINE
JOHN R. WINE, JR.
410 NE 43RD
TOPEKA, KS 66617

CERTIFICATE OF SERVICE

12-WSEE-112-RTS

RAY BERGMEIER, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027

ROBERT A. FOX, SENIOR LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027

ANDREW SCHULTE, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027

DOROTHY J. MYRICK
MYRICK CONSULTING SERVICES
5016 SE 29TH ST
TECUMSEH, KS 66542-9755

CARSON M. HINDERKS, ATTORNEY
SMITHYMAN & ZAKOURA, CHTD.
7400 W 110TH ST STE 750
OVERLAND PARK, KS 66210-2362

JAMES P. ZAKOURA, ATTORNEY
SMITHYMAN & ZAKOURA, CHTD.
7400 W 110TH ST STE 750
OVERLAND PARK, KS 66210-2362

MICHAEL D. FELIX
SPIRIT AEROSYSTEMS, INC.
PO BOX 780008, K06-10
WICHITA, KS 67278-0008

TIMOTHY E. MCKEE, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK ROAD, SUITE 300
WICHITA, KS 67226

CERTIFICATE OF SERVICE

12-WSEE-112-RTS

SAMUEL D. RITCHIE, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK ROAD, SUITE 300
WICHITA, KS 67226

ROBERT A. GANTON, ATTORNEY - REGULATORY LAW
UNITED STATES DEPARTMENT OF DEFENSE
US ARMY LEGAL SERVICES AGENCY
9275 GUNSTON ROAD, ATTN JALS-RL/IP
FORT BELVOIR, VA 22060-5546

MARTIN J. BREGMAN, EXEC DIR, LAW
WESTAR ENERGY, INC.
818 S KANSAS AVENUE
PO BOX 889
TOPEKA, KS 66601-0889

CATHRYN J. DINGES, CORPORATE COUNSEL
WESTAR ENERGY, INC.
818 S KANSAS AVENUE
PO BOX 889
TOPEKA, KS 66601-0889

JAMES G. FLAHERTY, ATTORNEY
ANDERSON & BYRD, L.L.P.
216 SOUTH HICKORY
PO BOX 17
OTTAWA, KS 66067

Della Smith
Administrative Specialist