2009.09.30 11:53:17 Kansas Corporation Commission /S/ Susan K. Duffy

BEFORE THE CORPORATION COMMISSION

OF THE STATE OF KANSAS

I

]

]

IN THE MATTER OF THE APPLICATIONS]

KANSAS GAS AND ELECTRIC COMPANY]

OF WESTAR ENERGY, INC. AND

FOR APPROVAL TO MAKE CERTAIN

CHANGES IN THEIR CHARGES FOR

ELECTRIC SERVICE

STATE CORPORATION COMMISSION

SEP 3 0 2009

Susan Thurfy

Docket No. 09-WSEE-925-RTS

DIRECT TESTIMONY OF

BRIAN KALCIC

ON BEHALF OF

THE CITIZENS' UTILITY RATEPAYER BOARD

September 30, 2009

1	Q.	Please state your name and business address.
2	A.	Brian Kalcic, 225 S. Meramec Avenue, St. Louis, Missouri 63105.
3		
4	Q.	What is your occupation?
5	A.	I am an economist and consultant in the field of public utility regulation, and principal of
6		Excel Consulting. My qualifications are described in the Appendix to this testimony.
7		
8	Q.	On whose behalf are you testifying in this case?
9	A.	I am testifying on behalf of the Citizens' Utility Ratepayer Board ("CURB").
10		
11	Q.	What is the subject of your testimony?
12	A.	I have been asked by CURB to evaluate the propriety of Westar's proposed class revenue
13		allocation, and its proposed residential and small general service ("SGS") rate design.
14		Consistent with the policy position previously advocated by CURB, I will also sponsor a
15		more conservation-oriented residential and SGS rate design to be implemented at the
16		conclusion of this case.
17		Finally, I will present an alternative residential rate design to illustrate how the
18		Company's residential rate schedules might be consolidated, in the event that the
19		Commission orders the Company to combine its Westar North and South rate schedules in
20		Docket No. 09-WSEE-641-GIE.
21		

1	Q.	Have you reflected CURB witness Andrea C. Crane's recommended revenue
2		adjustments for Westar North and South in your revenue allocation and rate design
3		proposals?
4	A.	Yes, I have.
5		
6	Q.	Please summarize your primary recommendations.
7	A.	Based upon my analysis of Westar's filing, I recommend that the Kansas Corporation
8		Commission ("KCC" or "Commission"):
9		• reject the Company's proposed residential rate design in Westar North and
10		Westar South;
11		• adopt CURB's recommended residential rate design which would provide a
12		stronger conservation price signal to Westar's residential customers, and
13		permit the consolidation of the Company's Conservation Use Service and
14		Standard Use Service rate schedules in Westar North at the conclusion of
15		this proceeding;
16		• adopt CURB's recommended SGS rate design which would begin a phase-
17		out of the Company's existing SGS declining block energy charges in this
18		proceeding.
19		
20		The specific details associated with the above recommendations are discussed below.

1 Class Revenue Allocations

2	Q.	Mr. Kalcic, how does the Company propose to recover its requested revenue increase
3		of \$19.7 million from Westar North and South customers?
4	A.	I can't say for certain because the Company has not provided a summary of its proposed
5		revenue allocation in its abbreviated filing. However, according to Mr. Rohlfs' direct
6		testimony at page 8, the Company proposes to apply "larger [than average] percentage
7		increases to classes with below average return indexes and smaller [than average]
8		percentage increases to classes that produce above average returns."
9		
10	Q.	Have you prepared a recommended class revenue allocation for Westar North and
11		South in this proceeding?
12	A.	Yes. My recommended revenue allocations for Westar North and South are shown in
13		Schedules BK-1 and BK-4, respectively.
14		
15	Q.	How did you arrive at your recommended class revenue allocations shown in
16		Schedules BK-1 and BK-4?
17	A.	In each instance, I used the class revenue allocation that was contained in the approved
18		Stipulation and Agreement ("S&A") in Docket No. 08-WSEE-1041-RTS to spread
19		CURB's overall recommended revenue adjustment to rate classes. In other words, my
20		recommended revenue allocations for Westar North and South are unchanged from what
21		the parties agreed to in Docket No. 08-WSEE-1041-RTS. ¹

¹ For Westar North, compare columns (2) and (4) of Schedule BK-1; for Westar South, compare columns (2) and (4) of Schedule BK-4.

2	Q.	Mr. Kalcic, why is it appropriate to utilize the class revenue allocations contained in
3		the S&A in this proceeding?
4	A.	This abbreviated proceeding is, in essence, a continuation of Westar's recently litigated
5		case at Docket No. 08-WSEE-1041-RTS. In that respect, it is more efficient to "recycle"
6		the class revenue allocations contained in the S&A and apply them to this case, rather than
7		re-litigate class cost of service and revenue allocation issues in an abbreviated proceeding.
8		In addition, I believe that it is reasonable to conclude that had the incremental
9		Westar North and South revenue requirements identified in this proceeding been previously
10		known (i.e., in Docket No. 08-WSEE-1041-RTS), the S&A reached by the parties with
11		respect to the class revenue allocations in Westar North and South would have been largely
12		unaffected.
13		
14	<u>Res</u>	idential Rate Design
15	Q.	Mr. Kalcic, please provide a brief description of the current residential service rate
16		schedules in Westar North.
17	A.	The Company serves Westar North residential customers via three (3) rate schedules:
18		Standard Service, Conservation Use Service and Restricted Peak Management Service. ²
19		The majority of Westar's customers take Standard Service, which is the default service
20		offering. The Standard Service rate schedule contains a customer charge, a three-step

² Restricted Peak Management Service is closed to new customers.

declining-block winter energy charge, and a two-step inclining-block summer energy
 charge.

3		The Conservation Use Service rate schedule is identical to the Standard Service rate
4		offering, except that customers are billed at the winter usage rate during the summer
5		months if their average daily consumption is less than 30 kWh. The Restricted Peak
6		Management Service rate schedule is intended to provide customers with the opportunity to
7		lower their total monthly bill by managing their peak usage. The rate contains a customer
8		charge, a flat-rate energy charge and a demand charge, with the latter seasonally
9		differentiated.
10		
11	Q.	Please describe the current residential service rate options in Westar South.
12	A.	The Company also serves Westar South residential customers via three (3) rate schedules,
13		in this case: Standard Service, Conservation Use Service, and Restricted Conservation Use
14		Service. ³ As in Westar North, Standard Service is the default service offering. The
15		Standard Service rate schedule contains a customer charge, a three-step declining-block
16		winter energy charge, and a two-step inclining-block summer energy charge. The
17		Conservation Use Service rate schedule is identical to the Standard Service rate offering,
18		except that customers are billed at the winter usage rate during the summer months if their
19		average daily consumption is less than 30 kWh. The Restricted Conservation Use Service
20		rate schedule contains a customer charge and a flat-rate energy charge, which is not
21		seasonally differentiated.

³ Restricted Conservation Use Service is closed to new customers.

1		
2	Q.	Does the Company propose to revise its Westar North and/or Westar South
3		residential rate structure in this proceeding?
4	A.	No. In this proceeding, the Company proposes to limit its residential rate design to changes
5		to the levels of its exiting tariff charges.
6		
7	Q.	How did the Company determine its proposed rate design in this proceeding?
8	A.	In general, the Company based its rate design on the principal of rate consolidation. In
9		other words, given its proposed class increases, Westar adjusted individual rate schedule
10		components so as to move toward rate parity between Westar North and South.
11		
12	Q.	Does CURB agree with the Company's proposed residential rate design in this
13		proceeding?
14	A.	No. As I discuss below, CURB finds that the Company's residential rate design should be
15		revised to provide stronger price signals to consumers to conserve electricity. Accordingly,
16		I have prepared a revised residential rate design in Westar North and South for the
17		Commission's consideration in this abbreviated proceeding.
18		
19	Q.	Why does CURB believe that it is appropriate to implement a more conservation-
20		oriented residential rate structure in this proceeding?
21	A.	CURB's Consumer Counsel informs me that the Commission has the authority to adjust

1		public policy, it is CURB's position that the Commission can, and should, encourage
2		conservation by revising existing rate structures to provide stronger conservation-oriented
3		price signals. Many Kansas electric utilities (such as Westar) are currently involved with
4		extensive capital expenditure programs. Greater conservation, if achieved, will help
5		consumers manage rising electric utility bills in the coming years and delay the need for
6		additional generation units.
7		
8	Q.	Mr. Kalcic, which specific feature(s) of the Company's existing residential rate
9		structure does CURB oppose?
10	A.	CURB opposes the Company's existing declining block energy charges, which are
11		applicable during the winter season. As currently configured, the Company's tariff
12		provides multiple discounts for increased consumption, beginning with the 501 st kWh
13		consumed by a customer during the winter. Such discounts encourage rather than
14		discourage consumption, and thus send the wrong price signal to customers.
15		
16	Q.	Does CURB recommend eliminating all of Westar's declining block winter rates in
17		this proceeding?
18	A.	As a policy mater, yes. For Westar North, the existing winter rate differentials are small
19		enough to eliminate in this proceeding. However, the existing rate differentials are too
20		large in Westar South to eliminate in this case. As a result, CURB recommends that the
21		effective winter rate discount in Westar South be reduced (but not eliminated) in this case.
22		

1	Q.	Have you prepared a revised residential rate design and proof of revenue for Westar
2		North?
3	A.	Yes, in Schedule BK-2.
4		
5	Q.	Please describe Schedule BK-2.
6	A.	Schedule BK-2 consists of seven (7) columns. Columns 1 contains the pro forma billing
7		determinants filed by Westar in Docket No. 08-WSEE-1041-RTS. Column 2 contains the
8		Company's present base rates. Column 3 shows the present revenue that is derived from
9		multiplying the Company's pro forma billing determinants in column 1 by the present rates
10		shown in column 2. CURB's revised rates are shown in column 4, and its revised revenue
11		is provided in column 5. Column 6 shows the percentage increase between present and
12		revised rates. Finally, column 7 presents CURB's revised residential base rates after
13		rolling-in the Company's ECRR rate from Docket No. 08-WSEE-1041-RTS.
14		As shown on line 21 of Schedule BK-2, CURB's revised rate design would produce
15		a total Westar North residential base rate revenue increase of \$3.403 million, which equates
16		to a base rate increase of 1.74% . ⁴

⁴ The Westar North residential increase of \$3.403 million is equal to the target increase shown in line 1, column 3 of Schedule BK-1.

Q. How do CURB's recommended Westar North residential rates compare to the Company's proposed rates?

3 A. CURB's recommended residential rate design adopts all of the Company's proposed non-4 usage-related charges. However, as shown in column 4, lines 6-8 of Schedule BK-2, 5 CURB's revised rates would establish a uniform rate block covering all winter usage. 6 Since the winter rates charged to Conservation Use Service customers are the same 7 as those charged to Standard Service customers, CURB's rate design also produces a 8 uniform winter rate block for Conservation Use Service customers (per column 4, lines 13-9 15 of Schedule BK-2). Furthermore, since the summer rates charged to Conservation Use 10 Service customers are set at the corresponding winter rates applicable to Standard Service 11 customers, the declining block rate structure that currently applies to the summer usage of 12 Conservation Use Service customers would be eliminated under CURB's recommended rate design.⁵ 13

14

Q. Does CURB's recommended Westar North residential rate design link the rates charged for all kWh in the winter and the first 900 kWh in the summer?

A. Yes, it does. As shown in column 4, lines 9-10 of Schedule BK-2, the rate charged for the
first 900 kWh of usage in the summer is the same as the uniform winter rate.

⁵ See column 4, lines 16-17 of Schedule BK-2.

1	Q.	Mr. Kalcic, column 4, lines 13-17 of Schedule BK-2 shows that CURB's revised rates
2		for Conservation Use Service are identical to those for Standard Service. Is CURB
3		recommending that the Conservation Use Service rate schedule be consolidated with
4		Standard Service in Westar North?
5	A.	Yes. If the Commission accepts CURB's recommended rate design, Conservation Use
6		Service would be consolidated with Standard Use Service. In effect, all Westar North
7		customers would receive a uniform, conservation-oriented price signal to hold usage under
8		900 kWh per month under CURB's revised rate design, and there would be no need for a
9		separate Conservation Use Service rate schedule.
10		
11	Q.	Did you prepare a similar recommended rate design and proof of revenue for
12		residential customers in Westar South?
13	A.	Yes. CURB's recommended residential rate design for Westar South is shown in Schedule
14		BK-5.
15		
16	Q.	Please discuss CURB's recommended Westar South residential rates.
17	A.	CURB's recommended rate design accepts the Company's proposed customer charge.
18		However, CURB's rate design is intended to reduce the rate discounts applicable to winter
19		usage in excess of 500 kWh per month. Specifically, as shown in column 4, lines 3-5 of
20		Schedule BK-5, CURB assigned the following increases to the winter usage charges: a) no
21		increase to the first (500 kWh) rate block; b) a class average increase of 2.15% to the

1		second (400 kWh) rate block; and c) a residual increase of 15.41% to the third (greater than
2		900 kWh) rate block.
3		CURB's recommended Westar South rate design would maintain the existing links
4		between the rates charged for the first 500 kWh in the winter and the first 900 kWh in the
5		summer. Finally, column 7 presents CURB's revised residential base rates after rolling-in
6		the Company's ECRR rate from Docket No. 08-WSEE-1041-RTS.
7		
8	Q.	How did you determine the level of the Westar South residential base rate increase of
9		2.15% shown on line 18 of Schedule BK-5?
10	A.	The Westar South residential increase in Schedule BK-5 is \$4.532 million. This increase
11		equates to the target increase shown in line 1, column 3 of Schedule BK-4.
12		
13	Q.	Mr. Kalcic, would you please summarize CURB's rate structure recommendations for
14		Westar North and South residential customers?
15	A.	Yes. If the Commission determines that Westar North and South rates should not be
16		consolidated, CURB recommends that the Commission direct Westar to: a) establish a
17		uniform winter consumption charge for Westar North customers; b) consolidate Westar
18		North's Standard Service and Conservation Use Service rate schedules; c) reduce the
19		existing rate discounts applicable to the winter usage in Westar South; and d) maintain a
20		uniform consumption charge in Westar South for summer usage up to 900 kWh per month
21		at the level of the winter rate for usage up to 500 kWh per month.
22		

1 SGS Rate Design

2	Q.	Mr. Kalcic, please provide a brief description of the current SGS rate schedules in
3		Westar North and South.
4	A.	The Company maintains one (1) SGS rate schedule in each rate area. Each rate schedule
5		contains a customer charge, a seasonally-differentiated demand charge and a non-seasonally
6		differentiated, declining block energy charge (with a breakpoint at 1,200 kWh per month of
7		usage).
8		
9	Q.	Does CURB agree with the Company's existing SGS rate structure?
10	A.	No. CURB opposes the Company's declining block SGS rate design since it does not
11		encourage conservation.
12		
13	Q.	What type of SGS rate design does CURB recommend for Westar North?
14	A.	CURB's recommended SGS rate design for Westar North is shown in Schedule BK-3.
15		Similar to the Company, CURB's assigned a class average increase to all of the Company's
16		existing demand charges (which are lower than the corresponding demand charges in
17		Westar South). CURB also assigned a class average increase to the usage charges
18		applicable to the Recreational Lighting and Unmetered Service subclasses. However, as
19		shown in column 4, lines 7-8 of Schedule BK-3, CURB's recommended rate design would
20		assign all of the class' residual increase to the second rate block. This rate design approach
21		would begin to eliminate the Company's SGS declining block rate structure.
22		

1	Q.	How did you determine the level of the Westar North SGS base rate increase of 1.68%
2		shown on line 18 of Schedule BK-3?
3	A.	The Westar North SGS increase in Schedule BK-3 is \$1.581 million, which is equal to the
4		target increase shown in line 2, column 3 of Schedule BK-1.
5		
6	Q.	Have you prepared a recommended SGS rate design for Westar South?
7	A.	Yes. CURB's revised SGS rate design for Westar South is shown in Schedule BK-6.
8		CURB's revised rate design accepts the Company's proposed non-usage charges, but would
9		assign all of the required increase to SGS energy charges to the second rate block.
10		
11	Q.	Mr. Kalcic, how did you determine the level of the Westar South SGS base rate
12		increase of 1.87% shown on line 13 of Schedule BK-6?
13	A.	The Westar South SGS increase in Schedule BK-6 is \$1.841 million, which is equal to the
14		target increase shown in line 2, column 3 of Schedule BK-4.
15		
16	<u>Cor</u>	nsolidated Residential Rate Design
17	Q.	Mr. Kalcic, have you prepared a rate design that illustrates how residential rates in
18		Westar North and South might be consolidated at the conclusion of this proceeding?
19	A.	Yes, in Schedule BK-7.
20		

1 Q. Please discuss Schedule BK-7.

2 Schedule BK-7 combines the base rate revenue requirements assigned to Standard Use and A. 3 Conservation Use Service in Schedules BK-2 and BK-5, and recovers that aggregate 4 revenue requirement via a single set of rates that would be applicable to Westar North and South customers.⁶ In general, the aggregate amount of revenue recovered in each of the 5 Company's residential rate blocks (across Westar North and South) in Schedules BK-2 and 6 BK-5 would be maintained in Schedule BK-7, but for certain small differences arising from 7 8 the need to maintain consistency between the rates charges to Conservation Use Service 9 and Standard Use service customers. 10 As shown in column 4, lines 2-4 of Schedule BK-7, CURB's illustrative rate 11 design would eliminate only one (1) of the Company's existing winter rate blocks 12 under this combined scenario. (In other words, all winter usage in excess of 500 13 kWh per month would be charged the same rate.) In CURB's view, establishing a 14 uniform winter usage rate on a consolidated basis in this proceeding would likely 15 impose excessive rate impact on residential heating customers. 16 Finally, as is the case under the Company's current rate structure, all summer usage up to 900 kWh per month would be charged the same rate as the first 17 18 500 kWh of winter usage. 19

⁶ Note that Peak Management Service in Westar North and Restricted Conservation Service in Westar South would remain as separate rate schedules.

1	Q.	What is the overall base rate increase on residential customers in Westar
2		North and South under the consolidated rate design shown in Schedule BK-7?
3	A.	As shown on line 15 of Schedule BK-7, pages 1 and 2 of 2, Westar North customers would
4		experience an overall base rate increase of 10.07%, while Westar South customers would
5		see an overall decrease of 5.09%.
6		
7	Q.	Do the consolidate rate impacts shown on Schedule BK-7 include the effects of
8		consolidating the Company's separate Westar North and South rate riders?
9	A.	They do not. If the Commission orders Westar North and South rates to be
10		combined, it is CURB's position that all base rates and riders be consolidated at the
11		same time. In the case of Westar's residential customers, CURB expects that the
12		consolidation of the Company's riders would act to mitigate the base rate impacts
13		shown in Schedule BK-7.
14		
15	Q.	In CURB's view, would it be feasible to consolidate the Company's residential rates at
16		the conclusion of this proceeding?
17	A.	As long as both base rates and riders were to be consolidated at the same time, it
18		would.
19		
20	Q.	Does this conclude your direct testimony?
21	A.	Yes.

VERIFICATION

STATE OF MISSOURI)	
)	SS
COUNTY OF)	

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.

Buin Halm

Brian Kalcic

SUBSCRIBED AND SWORN to before me this 28th day of September, 2009.

Notary of Public

My Commission expires:

"NOTARY SEAL " Janet M. Roseman, Notary Public St. Louis County, State of Missouri My Commission Expires 8/10/2010 Commission Number 06429986

APPENDIX A

Qualifications of Brian Kalcic

Qualifications of Brian Kalcic

Mr. Kalcic graduated from Illinois Benedictine College 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.

APPENDIX B

Supporting Schedules

`

WESTAR ENERGY NORTH

CURB Proposed Allocation of its Recommended Increase in Total Rate Revenue of \$7.910 million (12 Months Ended December 31, 2009)

		S&A		CURE	3
		Revenue	% of	Proposed	% of
Line	Classification	Increase 1/	Total	Increase	Total
		(1)	(2)	(3)	(4)
1	Residential	\$27,964,408	43.02%	\$3,403,090	43.02%
2	Small General Service	\$12,991,588	19.99%	\$1,580,995	19.99%
3	RITODS	\$16,437	0.03%	\$1,978	0.03%
4	Medium General Service	\$15,030,627	23.12%	\$1,829,135	23.12%
5	Public Schools	\$1,487,675	2.29%	\$181,063	2.29%
6	High LF/LTM/CS	\$5,990,749	9.22%	\$729,075	9.22%
7	Lighting Service	<u>\$1,518,516</u>	2.34%	\$184,780	2.34%
8	Total Retail	\$65,000,000	100.00%	\$7,910,116	100.00%

Note:

1/ See Appendix B, page 1 of 2 to the approved Stipulation and Agreement in Docket No. 08-WSEE-1041-RTS.

Schedule BK-2

WESTAR ENERGY NORTH

CURB Recommended Residential Rate Design and Proof of Revenue Standard / Conservation / Peak Management Service (Stand Alone Basis)

CURB	ECRR	(1)	\$8 00	\$10.00	\$1.63	\$5.43).051091	0.051091 0.051091		0.051091	0.051091	0.068263		0.051091	0.051091		0.051091 0.051091		.027725			
Dercentade	Change in Rates	(6) = (4)/(2)	000%	0.00%	%00.0	%00.0			0.00%	4.25% \$0 12.05% \$0		0.00% \$0	0.00% \$(1.45% \$(0.00%	4.25% al		0.00% \$(4.25% \$(1.74% \$(1.74%	
ι <u>.</u>	CURB	$(5) = (1)^*(4)$	\$28,992,144	\$1,463,300	\$1,948,575	\$2,693,448	\$35,097,467		\$39,672,485	\$19,207,813 \$16.775,887		\$17,083,489	\$12,886,156	<u>\$33.174.519</u> \$138,800,349		\$6,695,942	\$816,989		\$7,794,107 \$2,288,262	\$18,806,904	\$6.445.168	\$6,445,168	\$199,149,888	\$199,150,038 (\$150)
	CURB Rates 1/	(4)	\$8.00	\$10.00	\$1.63	\$5.43			\$0.048745	\$0.048745 \$0.048745		\$0.048745	\$0.048745	\$0.065917		\$0.048745	\$0.048745		\$0.048745 \$0.048745	I	\$0.025379	8 		Target Rounding
	Present Revenue	$(3) = (1)^{*}(2)$	\$28,992,144	\$1,463,300	\$1,948,575	\$2.693.448	\$35,097,467		\$39,672,485	\$18,424,054 \$14,972,165		\$17,083,489	\$12,886,156	<u>\$32,699,929</u> \$135,738,278		\$6,695,942 \$4,452,465	\$1,102,103 \$729,147		\$7,794,107 \$2,194,891	\$18,576,252	\$6.334.951	\$6,334,951	\$195,746,948	
2	Present Rates 1/	(2)	\$8.00	\$10.00	\$1.63	\$5.43			\$0.048745	\$0.046756 \$0.043504		\$0.048745	\$0.048745	\$0.064974		\$0.048745	\$0.043504		\$0.048745 \$0.046756	1	\$0.024945			
Company	Billing Determinants	(1)	3.624.018	146,330	1,195,445	496,031			813,878,041	394,046,829 344.156.052		350,466,498	264,358,511	503,277,138 2,670,183,069		137,366,744	24,000,900 16,760,461		159,895,520 46,943,520	385,822,201	253.956.730	• •	3,309,962,000	CURB DR 260 in 1041 Docket
L	Description		Non-Usage Charges Customer	Customer - PM	PM Demand - W	PM Demand - S	Subtotal	Usage Charges Standard Service Minter	1st 500 kWh	Next 400 kWh All add'i kWh	Summer	1st 500 kWh	Next 400 kWh	All add'l kWh Subtotal Standard	Conservation Service Winter	1st 500 kWh	Next 400 KWh All add'l KWh	Summer	1st 500 kWh Next 400 kWh	Subtotal Conserv.	<u>Peak Management</u> All kWh	Subtotal Peak Man.	Total Residential	Source: Note:
	Line		~	7	ო	4	5		9	8		თ	10	11		÷	15		16 17	18	19	20	21	

Excludes all riders and/or surcharges.
 Includes ECRR roll-in of \$0.002346 per kWh.

Schedule BK-3

WESTAR ENERGY NORTH

CURB Recommended SGS Rate Design and Proof of Revenue Standard / Lighting / Unmetered / Church Option (Stand Alone Basis)

							[CURB
		Company					Percentage	Kates w/
	Decementation	Rilling	Present	Present	CURB	CURB	Change	ECRR
	IONGIASAN	Determinants	Kates 1/	Kevenue	Rates 1/	Revenue	in Rates	Roll-in 2/
	Non-Usage Charges	(1)	(2)	$(3) = (1)^{*}(2)$	(4)	$(5) = (1)^{*}(4)$	(6) = (4)/(2)	(2)
-	Customer	544,546	\$16.00	\$8,712,736	\$16.00	\$8,712,736	0000	\$16.00
2	Std. Demand - W	3,514,710	\$3.25	\$11,422,808	\$3.30	\$11,598,543	1.54%	\$3.30
ო	Std. Demand - S	2,100,768	\$6.75	\$14,180,184	\$6.86	\$14.411.268	1.63%	\$6.86
4	C.O. Demand - W	168	\$1.00	\$168	\$1.02	\$171	2.00%	\$1.02
S	C.O. Demand - S	451	\$2.00	\$902	\$2.03	\$916	1.50%	\$2.03
9	Subtotal			\$34,316,798		\$34,723,634		
	Usage Charges							
	Standard Service							
~	1st 1,200 kWh	376,169,133	\$0.046387	\$17,449,358	\$0.046387	\$17,449,358	0.00%	\$0.047996
യത	All add'l kWh Subtotal Standard	<u>1.550.854,848</u> 1,927,023,981	\$0.027240	<u>\$42.245.286</u> \$59,694,644	\$0.027994	<u>\$43.414.631</u> \$60,863,989	2.77%	\$0.029603
	Recreational Lighting							
1 1	All kWh Subtotal Lighting	<u>4,947,046</u> 4,947,046	\$0.058319	<u>\$288,507</u> \$288,507	\$0.059297	<u>\$293,345</u> \$293,345	1.68%	\$0.060906
	<u>Unmetered Service</u>							
13 13	All kWh Subtotal Unmetered	<u>23.727</u> 23,727	\$0.046387	<u>\$1.101</u> \$1,101	\$0.047165	<u>\$1,119</u> \$1,119	1.68%	\$0.048774
	Church Option							
4	1st 1,200 kWh	22,669	\$0.046387	\$1,052	\$0.046387	\$1,052	0.00%	\$0.047996
15	Ali add'i kWh	91,133	\$0.027029	\$2,463	\$0.027994	\$2,551	3.57%	\$0.029603
16	Space Heating	31.444	\$0.024539	\$772	\$0.024950	\$785	1.67%	\$0.026559
17	Subtotal Church Op.	145,246		\$4,287		\$4,388		
18	Total SGS	1,932,140,000		\$94,305,337		\$95,886,475	1.68%	
	Source:	CURB DR 261 in 1041 Docket			Target Rounding	\$95,886,332 \$143		
	Note:							

1/ Excludes all riders and/or surcharges. 2/ Includes ECRR roll-in of \$0.001609 per kWh.

WESTAR ENERGY SOUTH

CURB Proposed Allocation of its Recommended Increase in Total Rate Revenue of \$9.206 million (12 Months Ended December 31, 2009)

		S&A		CURE	3
		Revenue	% of	Proposed	% of
Line	Classification	Increase 1/	Total	Increase	Total
		(1)	(2)	(3)	(4)
1	Residential	\$32,000,000	49.23%	\$4,532,256	49.23%
2	Small General Service	\$13,000,000	20.00%	\$1,841,220	20.00%
3	RITODS	\$120,372	0.19%	\$17,031	0.19%
4	Medium General Service	\$5,900,000	9.08%	\$835,638	9.08%
5	Education/Churches	\$713,628	1.10%	\$101,083	1.10%
6	High LF/CS	\$12,150,001	18.69%	\$1,720,805	18.69%
7	Lighting Service	<u>\$1,115,999</u>	1.72%	<u>\$158,069</u>	1.72%
8	Total Retail	\$65,000,000	100.00%	\$9,206,102	100.00%

Note:

1/ See Appendix B, page 2 of 2 to the approved Stipulation and Agreement in Docket No. 08-WSEE-1041-RTS.

Schedule BK-5

WESTAR ENERGY SOUTH

CURB Recommended Residential Rate Design and Proof of Revenue Standard / Conservation / Restricted Conservation Service (Stand Alone Basis)

CURB Rates w/	ECKK Roll-in 2/	(2)	\$8.00		\$0.062002	\$0.061220 \$0.053398	\$0.062002	\$0.062002 \$0.062002	1000 10:00		\$0.062002 \$0.061220	\$0.053398		\$0.061220 \$0.061220			\$0.043345		
Percentage	Change in Rates	(6) = (4)/(2)	0.00%		0.00%	2.15% 15.41%	%UU U	0.00% 0.00% 2.15%	22		0.00%	z. 13% 15.41%		0.00% 2.15%			%CL.7	2.15%	
	CURB Revenue	$(5) = (1)^{*}(4)$	<u>\$26,118,272</u> \$26,118,272		\$48,172,545	\$23,462,989 \$22,467,113	¢20 788 802	\$15,757,914 \$30,342,375	\$169,991,828		\$5,508,027 \$1,121,170	\$756,893		\$7,912,308 \$2,457,774	\$17,766,472		<u>\$1,683,980</u> \$1,683,980	\$215,560,552	\$215,560,729 (\$177)
	CURB Rates 1/	(4)	\$8.00		\$0.060538	\$0.059756 \$0.051934	\$0 060538	\$0.060538 \$0.074568			\$0.060538 *0.050756	\$0.051934		\$0.059756	• •		\$0.041881		Target Rounding
	Present Revenue	(3) = (1)*(2)	<mark>\$26.118.272</mark> \$26,118,272		\$48,172,545	\$22,969,825 \$19,467,403	\$20 788 802	\$15,757,914 \$38,515,092	\$165,671,671		\$5,508,027 \$1,107,600	\$1,107,000 \$655,836		\$7,912,308 \$2,406,115	\$17,589,974		<u>\$1,648,556</u> \$1,648,556	\$211,028,473	
ļ	Present Rates 1/	(2)	\$8.00		\$0.060538	\$0.058500 \$0.045000	\$0.060538	\$0.060538 \$0.073000			\$0.060538 \$0.050538	\$0.045000		\$0.058500			\$0.041000		
Company	Billing Determinants	(1)	3,264,784		795,740,614	392,646,581 432,608,948	343 402 365	260,297,891 527,604,003	2,752,300,402		90,984,624	10,334,043 14,574,127		130,699,866 41.130.166	296,323,626		40,208,679	3,088,832,703	CURB DR 260 in 1041 Docket
L	Description	Non-Usage Charges	Customer Subtotal	Usage Charges Standard Service Winter	1st 500 kWh	Next 400 kWh All add'l kWh	Summer 1st 500 kWh	Next 400 kWh All add'l kWh	Subtotal Standard	Conservation Service Winter	1st 500 kWh	All add'l kWh	Summer	1st 500 kWh Next 400 kWh	Subtotal Conserv.	Restricted Conserv.	All KVVh Subtotal Peak Man.	Total Residential	Source:
	Line	-	- 0	_	ы	4 v)	ų) ~ «	ით		; 1	12		13 13	15		16 17	18	

<u>Note:</u> 1/ Excludes all riders and/or surcharges. 2/ Includes ECRR roll-in of \$0.001464 per kWh.

Standard / Lighting / Unmetered (Stand Alone Basis)	CURB Percentage Rates w/	Present Present CURB Change ECRR	ts Rates 1/ Revenue Rates 1/ Revenue in Rates Roll-in 2/	(2) (3) = (1) ⁻ (2) (4) (5) = (1) ⁻ (4) (6) = (4)(2) (7)	04 \$16.00 \$6,865,664 \$16.00 \$6,865,664 \$16.00	14 \$3.75 \$10,228,178 \$3.75 \$10,228,178 0.00% \$3.75	92 \$7.00 <u>\$11.822.944</u> \$7.00 <u>\$11.822.944</u> 0.00% \$7.00 \$28,916,786 \$28,916,786		07 \$0 060594 \$18 455 897 \$0 060594 \$18 455 897 0 00% \$0 061731	27 \$0.038790 \$50.684,190 \$0.040197 \$52,522,619 3.63% \$0.041334 34 \$69,140,087 \$70,978,516 3.63% \$0.041334		<u>95</u> \$0.069261\$\$155.650\$0\$0.070559\$\$158.567\$1.87%\$0.071696 95\$\$158,567\$\$155,650\$\$155,650\$		40 \$0.000384 \$243 \$0.000394 \$243 0.007% \$0.001731 \$25 \$0.038790 \$133 \$0.040197 \$138 3.63% \$0.041334	71 \$383	00 \$98,212,901 \$100,054,252 1.87%	1 Target \$100,054,121 et 8131
Standard / Lighting / Unmetered (Stand Alone Basis)		Present Present CU	Revenue Rates 1/ Revenue Rat	$(z) = (2)^{-1}(1) = (2)^{-1}(1)^{-1}(2)^{-1}$	4 \$16.00 \$6,865,664 \$	4 \$3.75 \$10,228,178	2 \$7.00 <u>\$11.822.944</u> \$28,916,786		7 \$0 060594 \$18 455 897 \$0 0	.7 \$0.038790 \$50,684,190 \$0.0 4 \$69,140,087		<u>15</u> \$0.069261 <u>\$155.650</u> \$0.0 15 \$155,650		-0.038790 \$133 \$0.0	1 \$378	\$98,212,901	Ľ
	Company	Billing		() ()	429,10	2,727,51	1,688,99		304 582 90	<u>1,306,630,32</u> 1,611,213,23	D	<u>2.247,29</u> 2,247,29		4,04 3,42	sd 7,47	1,613,468,00	ce: CURB DR 261 in 1041 Docket
			<u>Description</u>	Non-Usage Charge	Customer	Std. Demand - W	Std. Demand - S Subtotal	Usage Charges	<u>Standard Service</u> 1st 1 200 kWh	All add'l KWh Subtotal Standard	Recreational Lightin	All kWh Subtotal Lighting	Unmetered Service	All add'l kWh	Subtotal Unmetere	Total SGS	Sourc
			<u>LIN</u>		-	2	ω4		Ś	9 ~		യത	Ċ	2 5	12	13	

Schedule BK-6

WESTAR ENERGY SOUTH

CURB Recommended SGS Rate Design and Proof of Revenue

Excludes all riders and/or surcharges.
 Includes ECRR roll-in of \$0.001137 per kWh.

Page 1 of 2 Schedule BK-7

WESTAR ENERGY NORTH

CURB Illustrative Residential Rate Design and Proof of Revenue Standard & Conservation Service (Consolidated Basis)

	L	,					
		Company Billing	Present	Present	Illustrative	Illustrative	Percentage Change
Line	Description	Determinants	Rates 1/	Revenue	Rates 1/	Revenue	in Rates
	Non-Usage Charges		(2)	(7) (1) - (0)	(t)	(+) (1) - (c)	(2)/(4) = (2)
.	Customer	3,624,018	\$8.00	\$28,992,144	\$8.00	\$28,992,144	0.00%
	Usage Charges Standard Service						
2	1st 500 kWh	813,878,041	\$0.048745	\$39,672,485	\$0.054575	\$44,417,394	11.96%
ო	Next 400 kWh	394,046,829	\$0.046756	\$18,424,054	\$0.052618	\$20,733,956	12.54%
4	All add'l kWh	344,156,052	\$0.043504	\$14,972,165	\$0.052618	\$18,108,803	20.95%
	Summer						
S	1st 500 kWh	350,466,498	\$0.048745	\$17,083,489	\$0.054575	\$19,126,709	11.96%
9	Next 400 kWh	264,358,511	\$0.048745	\$12,886,156	\$0.054575	\$14,427,366	11.96%
7	All add'l kWh	503,277,138	\$0.064974	\$32.699.929	\$0.069693	\$35.074.894	7.26%
8	Subtotal Standard	2,670,183,069		\$135,738,278		\$151,889,122	11.90%
	Conservation Service						
თ	1st 500 kWh	137,366,744	\$0.048745	\$6,695,942	\$0.054575	\$7,496,790	11.96%
6	Next 400 kWh	24,855,955	\$0.046756	\$1,162,165	\$0.052618	\$1,307,871	12.54%
7	All add'i kWh	16,760,461	\$0.043504	\$729,147	\$0.052618	\$881,902	20.95%
ć	Summer	150 805 520	\$0 048745	\$7 70A 107	\$0 054575	\$8 776 798	11 96%
ν Ω	Next 400 kWh	46.943.520	\$0.046756	\$2,194.891	\$0.052618	\$2.470.074	12.54%
4	Subtotal Conserv.	385,822,201		\$18,576,252	1	\$20,882,935	12.42%
15	Total Residential 2/	3,309,962,000		\$183,306,674		\$201,764,201	10.07%
	Source:	CURB DR 260 in 1041 Docket			WES Total Target	<mark>\$198.712.152</mark> \$400,476,353 \$400,475,969	
					היייייש	• • • • • •	

<u>Note:</u> 1/ Excludes all riders and/or surcharges. 2/ Excludes Peak Management Service.

Page 2 of 2 Schedule BK-7

WESTAR ENERGY SOUTH

CURB Illustrative Residential Rate Design and Proof of Revenue Standard & Conservation Service (Consolidated Basis)

	L	Company					Percentage
Line	Description	Billing Determinants	Present Rates 1/	Present Revenue	Illustrative Rates 1/	Illustrative Revenue	Change in Rates
		(1)	(2)	$(3) = (1)^{*}(2)$	(4)	$(5) = (1)^{*}(4)$	(6) = (4)/(2)
٣	Non-Usage Charges Customer	3,264,784	\$8.00	\$26,118,272	\$8.00	\$26,118,272	0.00%
	Usage Charges Standard Service Winter						
2	1st 500 kWh	795,740,614	\$0.060538	\$48,172,545	\$0.054575	\$43,427,544	-9.85%
ო	Next 400 kWh	392,646,581	\$0.058500	\$22,969,825	\$0.052618	\$20,660,278	-10.05%
4	All add'l kWh	432,608,948	\$0.045000	\$19,467,403	\$0.052618	\$22,763,018	16.93%
	Summer						
ъ	1st 500 kWh	343,402,365	\$0.060538	\$20,788,892	\$0.054575	\$18,741,184	-9.85%
ю	Next 400 kWh	260,297,891	\$0.060538	\$15,757,914	\$0.054575	\$14,205,757	-9.85%
~	All add'l kWh	527,604,003	\$0.073000	\$38,515,092	\$0.069693	\$36,770,306	-4.53%
ω	Subtotal Standard	2,752,300,402		\$165,671,671	1	\$156,568,087	-5.49%
	<u>Conservation Service</u> Winter						
6	1st 500 kWh	90,984,624	\$0.060538	\$5,508,027	\$0.054575	\$4,965,486	-9.85%
¢ t	Next 400 kWh All add'l kWh	18,934,843 14,574,127	\$0.058500 \$0.045000	\$1,107,688 \$655 836	\$0.052618 \$0.052618	\$996,314 \$766 861	-10.05% 16.93%
	Summer		5 5 5 5 5				
12	1st 500 kWh	130,699,866	\$0.060538	\$7,912,308	\$0.054575	\$7,132,945	-9.85%
13	Next 400 kWh	41,130,166	\$0.058500	\$2,406,115	\$0.052618 -	\$2,164,187	-10.05%
14	Subtotal Conserv.	296,323,626		\$17,589,974		\$16,025,793	-8.89%
15	Total Residential 2/	3,088,832,703		\$209,379,917		\$198,712,152	-5.09%
	Source:	CURB DR 260 in 1041 Docket					

Note: 1/ Excludes all riders and/or surcharges. 2/ Excludes Restricted Conservation Service.

CERTIFICATE OF SERVICE

09-WSEE-925-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, e-mailed or hand-delivered this 30th day of September, 2009, to the following:

* KURT J. BOEHM, ATTORNEY	* MICHAEL L. KURTZ, ATTORNEY
BOEHM, KURTZ & LOWRY	BOEHM, KURTZ & LOWRY
36 EAST SEVENTH STREET	36 EAST SEVENTH STREET
SUITE 1510	SUITE 1510
CINCINNATI, OH 45202	CINCINNATI, OH 45202
Fax: 513-421-2764	Fax: 513-421-2764
kboehm@bkllawfirm.com	mkurtz@bkllawfirm.com
TONI RAMIREZ WHEELER, DIRECTOR, LEGAL SERVICES DEPT. CITY OF LAWRENCE CITY HALL 6 EAST SIXTH ST LAWRENCE, KS 66044 Fax: 785-832-3405 twheeler@ci.lawrence.ks.us	* JOE ALLEN LANG, FIRST ASST. CITY ATTORNEY CITY OF WICHITA CITY HALL 13TH FLOOR 455 N MAIN STREET WICHITA, KS 67202 Fax: 316-268-4335 jlang@wichita.gov
* GARY E. RUBENSTORF, CITY ATTORNEY CITY OF WICHITA CITY HALL 13TH FLOOR 455 N MAIN STREET WICHITA, KS 67202 Fax: 316-268-4335 grebenstorf@wichita.gov	JOHN WINE, JR. 410 NE 43RD TOPEKA, KS 66617 Fax: 785-246-0339 jwine2@cox.net
<pre>* DANA BRADBURY, LITIGATION COUNSEL</pre>	* MATTHEW SPURGIN, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION	KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD	1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027	TOPEKA, KS 66604-4027
Fax: 785-271-3354	Fax: 785-271-3354
d.bradbury@kcc.ks.gov	m.spurgin@kcc.ks.gov
**** Hand Deliver ****	**** Hand Deliver ****
* DAVID BANKS, ENERGY MANAGER	* SARAH J LOQUIST, ASSISTANT GENERAL COUNSEL
UNIFIED SCHOOL DISTRICT 259	UNIFIED SCHOOL DISTRICT 259
SCHOOL SERVICE CENTER COMPLEX	ROOM 405
3850 N HYDRAULIC	201 N WATER
WICHITA, KS 67219-3399	WICHITA, KS 67202
Fax: 316-973-2150	Fax: 316-973-4497
dbanks@usd259.net	sloquist@usd259.net
* MARTIN J. BREGMAN, EXEC DIR, LAW	* CATHRYN J. DINGES, CORPORATE COUNSEL
WESTAR ENERGY, INC.	WESTAR ENERGY, INC.
818 S KANSAS AVENUE	818 S KANSAS AVENUE
PO BOX 889	PO BOX 889
TOPEKA, KS 66601-0889	TOPEKA, KS 66601-0889
Fax: 785-575-8136	Fax: 785-575-8136
marty.bregman@westarenergy.com	cathy.dinges@westarenergy.com
	Vella Smith

^{*} Denotes those receiving the Confidential version