# BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Kansas Gas and Electric Company Seeking Commission Approval to Implement Changes in their Transmission Delivery Charges Rate Schedules.	) ) ) )	Docket No. 16-WSEE-375-TAR
In the Matter of Westar Energy, Inc. and Kansas Gas and Electric Company Seeking Commission Approval to Implement Changes in their Transmission Delivery Charges Rate Schedules.	) ) ) )	Docket No. 17-WSEE-377-TAR
In the Matter of Westar Energy, Inc. and Kansas Gas and Electric Company Seeking Commission Approval to Implement Changes in their Transmission Delivery Charges Rate Schedules.	) ) ) )	Docket No. 18-WSEE-355-TAR

# ERRATA TO STAFF'S SEPTEMBER 2017 REPORT AND RECOMMENDATION

COMES NOW, the Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission," respectively) and files its Errata to Staff's September 2017 Report and Recommendation. In support thereof Staff states the following:

1. While preparing Staff's Response to Data Request 22 submitted to Staff by Holly Frontier El Dorado Refining LLC (Holly Frontier), Staff discovered an error in the Report to the Kansas Corporation Commission prepared by Dr. George McCollister (attached to Staff's September 2017 Report and Recommendation, hereinafter "McCollister Report).<sup>2</sup> Staff hereby submits this Errata to incorporate corrections to the McCollister Report. The corrections are as follows:

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<sup>&</sup>lt;sup>1</sup> The Commission has designated Docket No. 18-WSEE-355-TAR as the primary docket for these consolidated proceedings.

<sup>&</sup>lt;sup>2</sup> Report and Recommendation dated September 22, 2017 (Filed Sep. 26, 2017).

a. On page 4 of the McCollister Report – "Table 1: 12-CP Allocators As Filed and As

Corrected" has been updated to reflect a correction to weather-related adjustments.

Additionally, the text in the preceding paragraph has been changed to reflect the

corrected table.

b. On page 13 of the McCollister Report - "Table 4: Calibration and Weather

Normalization Results" has been updated to reflect a correction to weather-related

adjustments. Additionally, the text in the preceding paragraph has been changed to

reflect the corrected table.

2. With this Errata, Staff is providing corrected pages of the McCollister Report as

well as a copy of the Data Request Response that prompted the corrections.

WHEREFORE, Staff respectfully submits its Errata to the Commission and for any other

relief the Commission deems just and reasonable.

Respectfully submitted,

/s/ Robert Elliott Vincent

Robert Elliott Vincent, S. Ct. #26028

Senior Litigation Counsel

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ATTORNEY FOR COMMISSION STAFF

#### CORRECTED

Report and Recommendation: Review of Westar's 12-CP Allocator

Report to Kansas Commerce Commission

Two additional potential problems that I have identified are 1) Westar weather normalized the peak for only one month (August) and 2) there is a significant discrepancy between the sum of the hourly loads used in peak allocation and the accrued billed sales.

Both the summer and winter peaks should be weather normalized. Summer loads are highly sensitive to temperature due to air conditioning. Winter loads are highly sensitive to temperature due to electric space heating. I weather normalized the monthly peaks for all but two months, March and April. I discuss this in another section of this report.

As I will explain further on in this report, it is difficult to measure and even more difficult to correct for any bias in the sample from selecting replacements only from areas that have AMI meters. However, I was able to estimate the 12-CP allocations after correcting for both the improper weather normalization and the discrepancy between the sum of hourly loads used in peak allocation and accrued billed sales. The results of these corrections are shown in Table 1 below. The residential 12-CP allocation drops from 47.5% to 44.4%, still significantly above the averages in the prior filings of approximately 40% to 41%. The allocation for Small General Service (SGS) is almost unchanged from the filing, rising from 17.0% to 17.2%, but lower than in previous filings where it ranged from 18.8 to 23.4%. Medium General Service (MGS), Schools and Large General Service (LGS) all show significant increases in their allocation as a result of the corrections.

Table 1: 12-CP Allocators As Filed and As Corrected

	Residential	SGS	MGS	Schools	Religious	Lighting	LGS
As Filed	47.51%	17.04%	10.43%	2.26%	0.09%	0.64%	22.03%
Corrected	44.37%	17.16%	11.88%	3.15%	0.09%	0.59%	22.75%

### **CORRECTED**

Report and Recommendation: Review of Westar's 12-CP Allocator

Report to Kansas Commerce Commission

#### VI. The Results of Calibration and Weather Normalization

The results of calibrating the hourly loads to billed sales and weather normalizing all the summer and winter peaks is shown in the table below. The allocator for the residential class dropped by 3.1% whereas there were increases for MGS of 1.5%, Schools of 0.9% and LGS of 0.7%.

**Table 4: Calibration and Weather Normalization Results** 

12-CP Allocators							
	Residential	SGS	MGS	Schools	Religious	Lighting	LGS
As Filed	47.51%	17.04%	10.43%	2.26%	0.09%	0.64%	22.03%
Corrected	44.37%	17.16%	11.88%	3.15%	0.09%	0.59%	22.75%

# Holly Frontier El Dorado Refining LLC

Information Request

Request No.: 22

Company Name

Westar Energy, Inc. and Kansas Gas and Electric Company

**Docket Numbers** 

16-WSEE-375-TAR and 17-WSEE-377-TAR

Request Date

June 5, 2018

Date Information Needed

June 19, 2018

RE:

Customer Classes

Please Provide the Following: Reference Figure 2 of Dr. McCollister's September 18, 2017 Report.

- a. Dr. McCollister shows a weather adjustment of -84 for the MGS class. However, the supporting workpapers provided by Dr. McCollister (sheet labeled "LoadStudyResults" in the spreadsheet "PeakNormal-mccollister) do not apply the weather adjustments to the MGS class. The workpapers are color-coded to show which classes did not include weather adjustments, and both Mid C&I and Lighting are shaded green and did not include the weather adjustments. Did Dr. McCollister fail to apply weather adjustments to the MGS (i.e., Mid C&I) class in his workpapers, or was this an intentional change to his recommendations presented in his report? Please fully explain.
- b. The next to last column shown on Figure 2 is labeled "LGS", while the last column is labeled "Contract". According to the workpapers, it appears the -30 weather adjustment for "LGS" is applied to Dr. McCollister's "Full" customer class, and the -6 weather adjustment for "Contract" is applied to his "VeryLg" customer class. Is this a correct representation? Does the "Contract" weather adjustment apply to the three Westar customer classes included in Dr. McCollister's "VeryLg" class (LTM, ICS and Special Contract), or only relate to the Special Contract loads? Please fully explain your response.

#### RESPONSE:

- a. This is an error on my part. Thank you for pointing this out. I will amend my report to fix the error.
- b. It is a correct representation. It applies to the four customers in those three classes.

Submitted By

Holly Frontier El Dorado Refining LLC

Submitted To

The Kansas Corporation Commission Staff

If, for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

#### **Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find the answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Holly Frontier any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: May Ma Wellus,

Date: 6/18/2018

STATE OF KANSAS	)
	) ss
COUNTY OF SHAWNEE	)

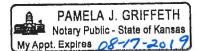
### **VERIFICATION**

Robert E. Vincent, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Errata to Staff's September 2017 Report and Recommendation* and that the statements contained therein are true and correct to the best of his knowledge, information and belief.

Robert E. Vincent, Litigation Counsel #26028 Kansas Corporation Commission of the

State of Kansas

Subscribed and sworn to before me this 21st day of June, 2018.



Notary Public

My Appointment Expires: August 17, 2019

#### 18-WSEE-355-TAR

I, the undersigned, certify that a true and correct copy of the above and foregoing Errata to Staff's September 2017 Report and Recommendation was served by electronic service on this 21st day of June, 2018, to the following:

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