

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

AUG 17 2012

by  
State Corporation Commission  
of Kansas

In the Matter of the Notice and )  
Application of Westar Energy, Inc. )  
and Kansas Gas and Electric Company for )  
a Limited Waiver of a Billing Standard )  
Related to Registered Meter Readings )

Docket No. 13-WSEE-144-TAR

**APPLICATION**

COME NOW Westar Energy, Inc. (Westar North) and Kansas Gas and Electric Company (Westar South) (collectively referred to as "Westar") and file this Application for a limited waiver of a portion of the requirement stated in the Commission's Electric and Natural Gas Billing Standards (Billing Standards), Section I, Item A (1) a. In support of its Application, Westar states:

1. Westar North and Westar South are corporations duly organized under the laws of the State of Kansas engaged, among other things, in the business of electric public utilities, as defined by K.S.A. 66-104, in legally designated areas within the State of Kansas. Westar holds certificates of convenience and authority issued by this Commission authorizing it to engage in such utility business.

2. Section I, Item A of the Commission's Billing Standards states, in part, "[e]ach utility bill issued to a customer shall show: (a) The beginning and ending meter registration for the reading period except that estimated billing shall disclose that it is based on estimated meter reading . . ."

3. As the Commission is aware, Westar has installed electronic meters for its residential and commercial customers in Lawrence as part of the SmartStar Lawrence program. The Commission approved this program in Docket No. 11-WSEE-610-ACT. Without additional work and programming, these electronic meters do not provide the traditional beginning and

ending meter registration that the non-electronic meters have always provided. Instead, they record electricity consumption continuously for time periods called intervals.<sup>1</sup>

4. Utility bills issued with beginning and ending registered reads are losing relevance as utilities are adopting time of use rates, dynamic rates, and install interval or electronic meters for billing purposes. Westar recently requested and received permission from the Commission to offer a pilot time of use rate in Docket No. 12-WSEE-112-RTS. A meter register is irrelevant with all time of use rates. The time of use rate has two or three daily billing periods and the rate applied to each period varies. As a result, it is necessary to have interval meter data in order to bill a customer using a time of use rate. The beginning and ending registered meter reads measuring the cumulative usage over the month are not relevant to the calculation of the customer's bill under a time of use rate. What is important is the number of kWh consumed in each time period (e.g., on peak or off peak).

5. Interval meter data is also used to perform market settlements in wholesale markets, perform load forecasting, and provide information to customers regarding their usage through an online system. For example, as part of the SmartStar program, Westar gives customers access to an online portal that provides detailed information about the customer's usage.

6. For customers that continue to have non-electronic meters in place, Westar will continue to comply with this portion of the Billing Standards and provide the beginning and ending meter registration for the reading period on the customer's bill. However, Westar is requesting a waiver with respect to this requirement for customers that have electronic meters in place.

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<sup>1</sup> Westar estimates that programming and testing to provide register reads in these limited circumstances to be approximately 1,800 man hours.

7. For customers with electronic meters, Westar requests that the Commission allow Westar to allow it to include either (1) the beginning and ending meter registration or (2) the interval data provided by the electronic meter on the customer's bill. Westar will make the determination regarding which information to include on a customer's bill based on the cost involved in programming the electronic meter to provide traditional beginning and ending meter reads, the rate the customer is taking service under (e.g., time of use), and an analysis of which approach will provide the most meaningful information regarding usage to that specific customer.

8. The General Terms and Conditions (GT&C) in Westar's Tariff mirror the Commission's Billing Standards. Westar's GT&C, Section 4.05.01(a) is identical to Section I, Item A of the Commission's Billing Standards. A draft revision to this section incorporating the proposed waiver is attached as Appendix A.

9. Westar requests that the Commission issue an order in this docket within 90 days of the date this Application is filed.

WHEREFORE, Westar respectfully requests that the Commission issue an order waiving the portion of Section I, Item A of the Billing Standards discussed in paragraphs 2 through 7 above.

Respectfully submitted,

WESTAR ENERGY, INC.  
KANSAS GAS AND ELECTRIC COMPANY

Cathryn Dinges  
Cathryn J. Dinges, #20848  
Corporate Counsel  
818 South Kansas Avenue  
Topeka, Kansas 66612  
Telephone: (785) 575-1986  
Fax: (785) 575-8136

**VERIFICATION**

STATE OF KANSAS                    )  
  )  
COUNTY OF SHAWNEE            )        ss:

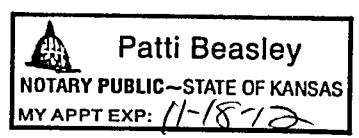
Cathryn J. Dinges, being duly sworn upon her oath deposes and says that she is the attorney for Westar Energy, Inc. and Kansas Gas and Electric Company; that she is familiar with the foregoing **Application** that the statements therein are true and correct to the best of her knowledge and belief.

Cathryn Dinges  
Cathryn J. Dinges

SUBSCRIBED AND SWORN to before me this 16<sup>th</sup> day of August, 2012.

Patti Beasley  
Notary Public

My Appointment Expires: 11-18-12



THE STATE CORPORATION COMMISSION OF KANSAS

WESTAR ENERGY, INC.

(Name of Issuing Utility)

ENTIRE SERVICE AREA

(Territory to which schedule is applicable)

Index \_\_\_\_\_

SCHEDULE GT&C

Replacing Schedule GT&C Sheet 11

which was filed January 21, 2009

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet 11 of 27 Sheets

**GENERAL TERMS AND CONDITIONS**

**4.04.05 Meter Reading Charge:**

- a) If a customer who has agreed to read customer's own meter fails to furnish a reading to Company for two consecutive billing periods, Company shall read customer's meter and assess customer a Meter Reading Charge as filed in Section 12.02, Meter Reading Charge.
- b) In cases where a meter has been read, Company, shall at customer's request, reread customer's meter. However, should the reread verify the accuracy of the regular read, Company shall assess customer a Meter Reading Charge as provided in Section 12.02, Meter Reading Charge. Should the reread of customer's meter indicate that the regular read was incorrect, Company will waive the Meter Reading Charge.

**4.05 Customer Billing:**

**4.05.01 Information on Bill: Customers' bills will show:**

- a) The beginning and ending meter reading for the billing period, or the usage for the billing period obtained from the electronic meter when it is more appropriate and cost effective to provide billing data in this manner, except that an estimated billing shall disclose that it is based on estimated usage and the word "Estimated" shall appear on the bill;
- b) the date of the most recent meter reading and the date of the billing;
- c) the final date by which a payment can be received before a Delayed Payment Charge is imposed;
- d) the actual or estimated Electric Service supplied during the billing period;
- e) the comparative energy consumption for the current billing period and the comparable period a year ago;

Issued \_\_\_\_\_  
Month Day Year

Effective \_\_\_\_\_  
Month Day Year

By \_\_\_\_\_  
Michael Lennen, Vice President



CATHRYN J. DINGES  
Corporate Counsel

August 17, 2012

Received  
on

AUG 17 2012

by  
State Corporation Commission  
of Kansas

Patti Petersen-Klein  
Executive Director  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, Kansas 66604

Re: In the Matter of the Notice and Application of Westar Energy, Inc. and Kansas Gas and Electric Company for a Limited Waiver of a Billing Standard Related to Registered Meter Readings  
Docket No. \_\_\_\_\_

Dear Ms. Petersen-Klein:

Enclosed for filing please find the original and eight copies of the Application.

Please file stamp one copy for my files.

Thank you for your assistance.

Sincerely,

  
Cathryn J. Dinges

Enclosures