

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Application of Kansas City)
Power & Light Company For Approval of Its) Docket No. 16-KCPE-446-TAR
Demand-Side Management Portfolio Pursuant to)
The Kansas Energy Efficiency Investment Act)
("KEEIA"), K.S.A. 66-1283.)

NOTICE OF FILING

COME NOW Kansas City Power & Light Company ("KCP&L") and states as follows:

1. On March 31, 2017, the Kansas Corporation Commission ("Commission") issued six questions to the parties in this docket requesting additional information.
2. Attached as **Exhibit A**, please find KCP&L's responses to the Commission's March 31st request for information.

Respectfully submitted,

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COUNSEL FOR
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing has been electronically served this 21st day of April 2017 to all counsel of record in this case constituting official service and no hard copy will follow.

/s/ Glenda Cafer

Counsel for Kansas City Power & Light Company

Docket No. 16-KCPE-446-TAR

Kansas City Power & Light Company KEEIA Application

Commissioner Questions:

- 1. Please analyze the difference between MEEIA and KEEIA. Specifically address Mo. Rev. Stat. Ann. § 393.1075 14. (1) and what the practical effect of its limitation is on participation in MEEIA. Given the absence of corresponding language in KEEIA, what is the anticipated effect on the level of participation?**

Response:

The two statutes, the Missouri Energy Efficiency Investment Act (“MEEIA”) enacted in 2009¹ and the Kansas Energy Efficiency Investment Act (“KEEIA”) enacted in 2014², are very similar in their operation and intent. In fact, the first draft of the KEEIA legislation was patterned after the effective MEEIA statute. This can be seen in the similarity of many of the provisions in the two statutes. Both statutes require their respective commissions to provide for timely cost recovery for electric utilities, ensure that financial incentives are aligned with helping customers to use energy more efficiently, and provide timely earnings opportunities for utilities associated with cost-effective, measurable and verifiable demand-side program savings. Both statutes address the development of cost recovery mechanisms, the requirements for recovery of program costs, and low income and educational programs in similar fashion. Both MEEIA and KEEIA have annual reporting requirements for utilities with similar reporting components. They both also address cost-effectiveness testing; however, the MEEIA specifies use of the Total Resource Cost (“TRC”) test while the KEEIA leaves the determination of the appropriate test(s) to the Commission.

¹ Missouri Energy Efficiency Investment Act is attached as **Attachment A**.

² Kansas Energy Efficiency Investment Act is attached as **Attachment B**.

The Missouri Public Service Commission (“MPSC”) chose to draft rules and regulations to set the parameters for implementation as allowed by the MEEIA statute. While the KEEIA also included language allowing the Commission to adopt rules and regulations for the administration of the KEEIA, no specific rules or regulations related to implementation of the KEEIA statute have been discussed or issued by the Kansas Corporation Commission (“KCC”).

A main difference between the KEEIA and MEEIA from a demand-side management (“DSM”) customer program participation perspective is that MEEIA has an opt-out provision which decreases business program participation in Missouri. This MEEIA opt-out provision (Section 393.1075.7) is set aside for commercial or industrial customers that meet certain load and other criteria. For 2017, 44 customers opted out of participating in MEEIA GMO and KCP&L programs. These 44 customers represent approximately 20% of the Company’s Missouri commercial and industrial customer load. While, per the statute, these opt-out customers are not eligible to participate in the majority of the MEEIA programs, they are still eligible to participate in interruptible or curtailable rate schedules or tariffs (demand response programs) offered within KCP&L’s MPSC-approved DSM portfolio.

The KEEIA has a residential fuel switching provision for heating systems that limits the types of equipment installed which could reduce the amount of residential customer participation. The MEEIA does not have this provision or any other fuel switching provision.

The MEEIA also has a provision that prevents customers from receiving a monetary incentive under a DSM program if they have already received a tax credit for the same property. Below is the language from the § 393.1075 14, which can be found at <http://www.moga.mo.gov/mostatutes/stathtml/39300010751.html>.

14. (1) Any customer of an electrical corporation who has received a state tax credit under sections 135.350 to 135.362 or under sections 253.545 to 253.561*

shall not be eligible for participation in any demand-side program offered by an electrical corporation under this section if such program offers a monetary incentive to the customer, except as provided in subdivision (4) of this subsection.

(2) As a condition of participation in any demand-side program offered by an electrical corporation under this section when such program offers a monetary incentive to the customer, the commission shall develop rules that require documentation to be provided by the customer to the electrical corporation to show that the customer has not received a tax credit listed in subdivision (1) of this subsection.

(3) The penalty for a customer who provides false documentation under subdivision (2) of this subsection shall be a class A misdemeanor.

(4) The provisions of this subsection shall not apply to any low-income customer who would otherwise be eligible to participate in a demand-side program that is offered by an electrical corporation to low-income customers.

The provision of the tax credit language was added to the statute in 2009, during a time in Missouri where historical and low income housing tax credits were extremely controversial and many elected officials were attempting to revise the way tax credits were distributed and redeemed. The two tax credits were causing significant budget issues for the State of Missouri. The amendment in 2009 really had nothing to do with energy efficiency programs but was targeted at developers who may receive multiple benefits for the same property. Since implemented in 2009, there have been annual attempts to remove the provision.

There are facilities in Missouri that have received Historic Building tax credits and Low Income Housing tax credits and therefore have been restricted from participating in KCP&L's DSM programs. Although ineligible to participate, these impacted customers must still pay the demand-side investment mechanism ("DSIM") charge. We have no way to know for certain which of these impacted customers would have participated absent the statutory restriction, but it is certain that the pool of customers who could participate in KCP&L's MEEIA programs was reduced by this provision. With no similar restrictions on Kansas customers, the opportunity for

customers to participate in our programs should allow for generally better participation from buildings of all types.

2. Are there other features of Missouri law, Missouri PUC regulations, or Missouri PUC orders that are different from those in Kansas, that have an impact on participation? (i.e., renewable mandates, retail rate caps, or other ratepayer protections.)

Response:

Beyond the MEEIA statute, we are not aware of any Missouri statutes, (i.e., renewable mandates, retail rate caps or other ratepayer protections), that impact participation in KCP&L's MEEIA programs; however, there are facets of the Missouri MEEIA rules and regulations that have some impact on how participation happens in Missouri DSM programs. Specifically, Missouri spent considerable time creating rules and regulations (2009 to 2011 timeframe) – 4 CSR 240-20.093 and 4 CSR 240-20.094 and 4 CSR 240-3.163 and 4 CSR 240-3.164.

Missouri rules and regulations outline that a utility does not have to file for MPSC approval of a modification to its DSM portfolio budget until the utility incurs an overage of greater than 20% of the *portfolio plan* three-year budget. 4 CSR 240-20.094 (4). This provision, in effect, allows utilities the flexibility to garner participation in programs greater than that initially proposed and approved. In contrast, Kansas rules allow flexibility of 10% above the approved budget *on a program-by-program basis* before the need to file for KCC approval of a modification to a DSM program budget.

The Missouri rules and regulations outline that in the process to approve DSM programs, the MPSC *shall* approve programs and program plans that have a TRC test ratio of greater than 1.0 provided the utility has met the filing requirements. 4 CSR 240-20.094 (3) A. This straightforward provision has the potential to allow for utilities' proposed programs to target specific customer segments as long as the TRC test is greater than 1.0 and all filing requirements

are met. Kansas does not provide such straightforward guidance on test guidelines. The KEEIA gives the Commission discretion on which tests will apply for determination of program approval. The KCC states that they will look at all of the tests but will give more weight to the TRC test and the Ratepayer Impact Measurement (“RIM”) test. There are no clear guidelines on the threshold a program must meet under the RIM or other tests; in fact, the Commission specifically stated it “declines to adopt a bright-line rule that if benefit-cost tests are passed, a program will be approved.”³ All the Commission has stated is that it is unlikely a program that fails the TRC test will be approved, and it is unlikely a program that meets all tests will be denied.⁴

3. **If the TRM is adopted as proposed and Kansas-specific information comes to light after its adoption, at what point during the three-year pilot could the TRM be modified to capture the new information? Could the modification occur during the term of the pilot? If so, would this modification alter the evaluation of cost-effectiveness of the program? Or would the modification have to wait until completion of EM&V? If the modification can occur during the pilot term, would EM&V be measured against the initial projected savings or the actual costs?**

Response:

The Company’s proposal would allow modifications to the Technical Resource Manual (“TRM”) at any time, subject to Commission approval. However, it is generally preferable to avoid frequent changes to the TRM because of the level of effort required and to minimize confusion for the implementers, customers, and utility tracking.

It is anticipated that the most likely and best source of new Kansas-specific information for the TRM would come from the evaluation, measurement and verification (“EM&V”) study results completed twice as a part of the Company’s KEEIA Cycle 1 proposal – after the first 18 months

³ 08-442 Order, p. 10.

⁴ 08-442 Order, p. 10.

and again after 36 months. Upon review of the final EM&V results, the TRM would be updated, as appropriate, and submitted to the Commission for approval.

Ultimately, the final determination of the actual savings for a KCP&L program are the EM&V results for that program. If it is determined, through EM&V results or other information learned during the Cycle, that the TRM inputs for a measure should be updated, the Company would re-evaluate the cost-effectiveness of the program and make recommendations for any adjustments, as necessary, for Commission approval.

Note that a modification to the TRM has no impact on the EM&V results. A TRM modification impacts the collection of Throughput Disincentive (“TD”) in the short-term by modifying the estimated TD to be collected, but in the longer term TD would be trued-up when EM&V results are final. The only net impact on TD collection would be the difference in interest collected or paid at the short-term borrowing rate. The Company’s Earnings Opportunity (“EO”) would not be impacted by interim TRM updates because it is calculated only after the final EM&V study is complete and is based on final EM&V results.

4. KCPL, please provide load growth data for the past 10 years.

Response:

Please see **Attachment C** for the requested information. This attachment provides weather-normalized billed sales (kWh) and number of customers (residential, commercial and industrial) for 2000 through 2016. Attachment C also includes a computation of sales and customer growth, as well as average use per customer.

5. **Please provide what the impact on retail rates will be at the end of the three-year pilot period. Please provide analysis based upon KCP&L, Staff, and CURB's avoided cost and with and without the throughput disincentive.**

Response:

The impact of KCP&L's proposed DSM programs to base retail rates at the end of the three-year Cycle 1 pilot period would be seen via the reduction of future rate case weather-normalized test period kWh sales to reflect kWh savings achieved through the programs.⁵ Additionally, those kWh savings would impact the associated variable costs such as fuel expense. So, if one assumes an overall 1% kWh savings reduction for the residential class for Cycle 1, which is close to what is included in this KEEIA filing, there would be a reduction in the test year billing determinants for the residential class of that same percentage to reflect decreased usage associated with KEEIA. All else being equal, the reduced kWh billing determinants would result in an increase in base retail rates per kWh. This is most easily illustrated with an example. Total kWh for KCP&L's retail electric customers as filed in its recent abbreviated rate case (Docket No. 17-KCPE-201-RTS) was 6,362,880,000 kWh.⁶ Total kWh savings for the KEEIA portfolio proposed by KCP&L is 91,319,658.⁷ This equates to a kWh reduction of approximately 1.4%. Assuming the base retail revenue requirement does not change from the \$578,013,632⁸ in KCP&L's as filed abbreviated rate case, then overall base retail rates would increase from an overall average of \$0.09084⁹ to an overall average of \$0.09216¹⁰ or an increase of 1.4%.¹¹ This reflects only the effect of the kWh savings from the KEEIA program. It does not reflect any variable cost savings

⁵ See the KEEIA Report, and the Rebuttal Testimony of Mark Foltz.

⁶ See 17-201 Docket, Nov. 9, 2016 filing, Retail Revenue Summary, Section 2, MFR.

⁷ See Kansas City Power & Light Company's Corrections to KEEIA Report, filed Sep. 12, 2016, Corrections to Executive Summary Table 1-1, Portfolio Total kWh Savings.

⁸ See 17-201 Docket, Nov. 9, 2016 filing, Retail Revenue Summary, Section 2, MFR, Base Revenue (prior to adjustments).

⁹ $\$578,013,632 / 6,362,880,000 \text{ kWh} = \$0.0908415/\text{kWh}$.

¹⁰ $\$578,013,632 / (6,362,880,000 - 91,319,658 \text{ kWh}) = \$0.0921642/\text{kWh}$

¹¹ Note that KCP&L's retail base rates carry only five places to the right of the decimal causing some rounding effect.

such as fuel costs or savings related to future benefits accruing to customers as demand on the system is reduced thereby pushing out the need for future infrastructure investments.

To look at the average customer bill impact, the increase in base retail rates must be viewed in light of the reduction in kWh on the bill. For example, if an average customer uses 1.4% fewer kWh per month, the higher base retail rate (\$/kWh) will be applied against fewer kWh. A typical residential customer uses 1011 kWh per month. Reducing that by 1.4% to 996.846 kWh and using the rates discussed above both lead to a monthly bill of \$92. Most of KCP&L's riders have a similar impact.¹²

This takes us to the fuel rider – the Energy Cost Adjustment (“ECA”) Rider. Fuel costs are variable based on the amount of energy that must be produced. By lowering kWh usage, fuel costs are correspondingly lowered. Therefore, a customer should see a lower fuel charge on their bill commensurate with their reduced kWh usage. ECA Rider rates have ranged from \$0.01631/kWh to \$0.02320/kWh over the past 12 months.¹³ Given the average 1.4% kWh usage reduction discussed above, this would result in a bill reduction of between \$0.23 to \$0.33 per month on average, all else being equal. The decreased kWh usage and associated benefit would be expected to continue over the useful lives of the measures installed under KEEIA Cycle 1, which can be up to 15-20 years.

The example above averages the kWh savings over all customers. Obviously, those customers who participate in the DSM programs will benefit more than those who do not, both in terms of lower kWh usage and, in some instances, from incentive payments.

¹² The Transmission Delivery Charge (“TDC”) Rider, the Property Tax Surcharge (“PTS”) Rider and the Energy Efficiency Rider (“EER”) are all applied on a \$/kWh basis for residential customers. These riders will affect the customer bills in the same manner as the base rates – that is, the lower kWh usage will cause the \$/kWh rider rate to increase but the customer will not see a bill increase because the increased rate is offset by the lower customer usage.

¹³ See kcpl.com, My Bill, Rate Information, Energy Cost Adjustment Factors.

This is a simplistic example which attempts to isolate the impacts on customer bills of kWh usage reduction associated with KEEIA all else being equal. As stated above, it does not take into account the longer-term benefits that reduce the per kWh rate due to lower system usage that will push out the need to construct additional assets to serve customer load.

The Commission also requests that the impact be reviewed with and without the throughput disincentive ("TD"). The TD affects the DSIM Rider between rate cases, but once the reduced usage from the KEEIA programs is reflected in base rates as a result of a rate case, the throughput disincentive has been addressed and is no longer a separate rate item.

Regarding the request to provide analysis based upon Staff's and CURB's avoided cost assumptions, the Company would like to clarify that the various avoided capacity cost assumptions do not directly impact the analysis of retail rates; the avoided capacity cost assumption only impacts the calculation of the cost-effectiveness of programs which, in turn, affects which programs will be included in the portfolio. Therefore, to perform the requested analysis using Staff's avoided capacity cost assumption requires that we modify the basis for kWh savings assumption using only the costs and impacts of those programs recommended for approval by Staff. The Company has prepared this calculation using the estimated kWh savings associated with Staff's recommended portfolio of eight programs as shown in the revised Schedule DRI-1 or 51,396,107 kWh.¹⁴ This represents a kWh savings of 0.8%. As demonstrated with the example using KCP&L's proposed program portfolio, the associated increase in base retail rates, all else being equal, would be 0.8% before consideration of variable cost savings such as fuel and without consideration of future savings due to delayed asset investment. Generally speaking, the impact

¹⁴ See Kansas City Power & Light Company Corrected Notice of Filing Update Schedule DRI-1, filed Mar. 22, 2017.

of Staff's recommendation will be positive but measurably smaller than the impact of KCP&L's proposed programs.

As CURB's avoided capacity cost assumption results in their recommendation that the entire portfolio be rejected, there is no analysis included for CURB.

6. Please provide any readily available information or public report that provides a comparison of KCPL's electric rates to those of surrounding jurisdiction and/or the SPP footprint.

Response:

Please see **Attachment D** for the requested information. Attachment D provides a comparison of rates in average cents per kWh and national utility rankings based on the most recent Edison Electric Institute ("EEI") Average Rates and Typical Bills Comparison. It compares KCP&L electric rates to various regional electric utilities as well as to regional and national average utility electric rates. Note that the Retail, Residential, Commercial, and Industrial Average Rates are for the 12 months ending June 30, 2016 and the Residential Typical Bills are based on the rates in effect as of July 1, 2016.

The Regional & National tab presents a comparison of the Average Rates and the associated ranking of each rate (1 being the best rate) of those utilities that participated in this survey. The Typical Res Bills (\$) tab presents typical residential annual bills as well as typical bills by season going back at least 10 years.

VERIFICATION

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

The undersigned, Mary Britt Turner, upon oath first duly sworn, states that she is the Director, Regulatory Affairs for Kansas City Power & Light Company, that she has reviewed the foregoing Response to Commissioner Questions, that she is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of her knowledge and belief.

Mary Britt Turner
Mary Britt Turner
Director, Regulatory Affairs
Kansas City Power & Light Company

Subscribed and sworn to before me this 21st day of April 2017.

Karen M. Smith
Notary public

My commission expires:

April 16, 2020



Missouri Revised Statutes

Chapter 393 Gas, Electric, Water, Heating and Sewer Companies

- **Section 393.1075.1**

August 28, 2016

Citation of law--definitions--policy to value demand-side investments equal to traditional investments--development of cost recovery mechanisms--costs not to be assigned to customers, when--rulemaking authority--annual report--certain charges to appear on bill.

393.1075. 1. This section shall be known as the "Missouri Energy Efficiency Investment Act".

2. As used in this section, the following terms shall mean:

(1) "Commission", the Missouri public service commission;

(2) "Demand response", measures that decrease peak demand or shift demand to off-peak periods;

(3) "Demand-side program", any program conducted by the utility to modify the net consumption of electricity on the retail customer's side of the electric meter, including but not limited to energy efficiency measures, load management, demand response, and interruptible or curtailable load;

(4) "Energy efficiency", measures that reduce the amount of electricity required to achieve a given end use;

(5) "Interruptible or curtailable rate", a rate under which a customer receives a reduced charge in exchange for agreeing to allow the utility to withdraw the supply of electricity under certain specified conditions;

(6) "Total resource cost test", a test that compares the sum of avoided utility costs and avoided probable environmental compliance costs to the sum of all incremental costs of end-use measures that are implemented due to the program, as defined by the commission in rules.

3. It shall be the policy of the state to value demand-side investments equal to traditional investments in supply and delivery infrastructure and allow recovery of all reasonable and prudent costs of delivering cost-effective demand-side programs. In support of this policy, the commission shall:

(1) Provide timely cost recovery for utilities;

(2) Ensure that utility financial incentives are aligned with helping customers use energy more efficiently and in a manner that sustains or enhances utility customers' incentives to use energy more efficiently; and

(3) Provide timely earnings opportunities associated with cost-effective measurable and verifiable efficiency savings.

4. The commission shall permit electric corporations to implement commission-approved demand-side programs proposed pursuant to this section with a goal of achieving all cost-effective demand-side savings. Recovery for such programs shall not be permitted unless the programs are approved by the commission, result in energy or demand savings and are beneficial to all customers

in the customer class in which the programs are proposed, regardless of whether the programs are utilized by all customers. The commission shall consider the total resource cost test a preferred cost-effectiveness test. Programs targeted to low-income customers or general education campaigns do not need to meet a cost-effectiveness test, so long as the commission determines that the program or campaign is in the public interest. Nothing herein shall preclude the approval of demand-side programs that do not meet the test if the costs of the program above the level determined to be cost-effective are funded by the customers participating in the program or through tax or other governmental credits or incentives specifically designed for that purpose.

5. To comply with this section the commission may develop cost recovery mechanisms to further encourage investments in demand-side programs including, in combination and without limitation: capitalization of investments in and expenditures for demand-side programs, rate design modifications, accelerated depreciation on demand-side investments, and allowing the utility to retain a portion of the net benefits of a demand-side program for its shareholders. In setting rates the commission shall fairly apportion the costs and benefits of demand-side programs to each customer class except as provided for in subsection 6 of this section. Prior to approving a rate design modification associated with demand-side cost recovery, the commission shall conclude a docket studying the effects thereof and promulgate an appropriate rule.

6. The commission may reduce or exempt allocation of demand-side expenditures to low-income classes, as defined in an appropriate rate proceeding, as a subclass of residential service.

7. Provided that the customer has notified the electric corporation that the customer elects not to participate in demand-side measures offered by an electrical corporation, none of the costs of demand-side measures of an electric corporation offered under this section or by any other authority, and no other charges implemented in accordance with this section, shall be assigned to any account of any customer, including its affiliates and subsidiaries, meeting one or more of the following criteria:

(1) The customer has one or more accounts within the service territory of the electrical corporation that has a demand of five thousand kilowatts or more;

(2) The customer operates an interstate pipeline pumping station, regardless of size; or

(3) The customer has accounts within the service territory of the electrical corporation that have, in aggregate, a demand of two thousand five hundred kilowatts or more, and the customer has a comprehensive demand-side or energy efficiency program and can demonstrate an achievement of savings at least equal to those expected from utility-provided programs.

8. Customers that have notified the electrical corporation that they do not wish to participate in demand-side programs under this section shall not subsequently be eligible to participate in demand-side programs except under guidelines established by the commission in rulemaking.

9. Customers who participate in demand-side programs initiated after August 1, 2009, shall be required to participate in program funding for a period of time to be established by the commission in rulemaking.

10. Customers electing not to participate in an electric corporation's demand-side programs under this section shall still be allowed to participate in interruptible or curtailable rate schedules or tariffs offered by the electric corporation.

11. The commission shall provide oversight and may adopt rules and procedures and approve corporation-specific settlements and tariff provisions, independent evaluation of demand-side programs, as necessary, to ensure that electric corporations can achieve the goals of this section. Any rule or portion of a rule, as that term is defined in section [536.010](#), that is created under the authority delegated in this section shall become effective only if it complies with and is subject to all of the provisions of chapter 536 and, if applicable, section [536.028](#). This section and chapter 536 are

nonseverable and if any of the powers vested with the general assembly pursuant to chapter 536 to review, to delay the effective date, or to disapprove and annul a rule are subsequently held unconstitutional, then the grant of rulemaking authority and any rule proposed or adopted after August 28, 2009, shall be invalid and void.

12. Each electric corporation shall submit an annual report to the commission describing the demand-side programs implemented by the utility in the previous year. The report shall document program expenditures, including incentive payments, peak demand and energy savings impacts and the techniques used to estimate those impacts, avoided costs and the techniques used to estimate those costs, the estimated cost-effectiveness of the demand-side programs, and the net economic benefits of the demand-side programs.

13. Charges attributable to demand-side programs under this section shall be clearly shown as a separate line item on bills to the electrical corporation's customers.

14. (1) Any customer of an electrical corporation who has received a state tax credit under sections [135.350](#) to [135.362](#) or under sections [253.545](#) to 253.561* shall not be eligible for participation in any demand-side program offered by an electrical corporation under this section if such program offers a monetary incentive to the customer, except as provided in subdivision (4) of this subsection.

(2) As a condition of participation in any demand-side program offered by an electrical corporation under this section when such program offers a monetary incentive to the customer, the commission shall develop rules that require documentation to be provided by the customer to the electrical corporation to show that the customer has not received a tax credit listed in subdivision (1) of this subsection.

(3) The penalty for a customer who provides false documentation under subdivision (2) of this subsection shall be a class A misdemeanor.

(4) The provisions of this subsection shall not apply to any low-income customer who would otherwise be eligible to participate in a demand-side program that is offered by an electrical corporation to low-income customers.

15. The commission shall develop rules that provide for disclosure of participants in all demand-side programs offered by electrical corporations under this section when such programs provide monetary incentives to the customer. The disclosure required by this subsection may include, but not be limited to, the following: the name of the participant, or the names of the principals if for a company, the property address, and the amount of the monetary incentive received.

(L. 2009 S.B. 376 § 393.1124, A.L. 2013 H.B. 142)

*Section 253.561 was repealed by S.B. 613, 2007

KANSAS ENERGY EFFICIENCY INVESTMENT ACT (KEEIA)

66-1283. Utilities; demand-side program; energy efficiency. (a) As used in this section:

- (1) "Commission" means the state corporation commission;
- (2) "demand response" means measures that decrease peak demand or shift demand to off-peak periods of time;
- (3) "demand-side program" means any program conducted by: (A) An electric utility to reduce the net consumption of electricity by a retail electric customer; or (B) a natural gas utility to reduce the net consumption of natural gas by a retail gas customer.

"Demand-side program" may include, but shall not be limited to: (A) Energy efficiency measures, not to include any measures to incent fuel switching for residential heating systems; (B) load management; (C) demand response; and (D) interruptible or curtailable load;

(4) "energy efficiency" means measures that reduce the amount of energy required to achieve a given end use; and

(5) "public utility" means any public electric or gas utility, as defined in K.S.A. 66-101, and amendments thereto, but does not include a municipally-owned electric or gas utility or an electric or gas cooperative that is exempt from commission jurisdiction pursuant to K.S.A. 66-104d, and amendments thereto.

(b) It is the goal of the state to promote the implementation of cost-effective demand-side programs in Kansas. It shall be the policy of the state to value demand-side program investments equal to traditional investments in supply and delivery infrastructure as much as is practicable, but public utilities shall not be required to offer, implement or continue demand-side programs.

(c) (1) (A) The commission shall permit public utilities to implement commission-approved demand-side programs and cost recovery mechanisms submitted pursuant to this section. The commission shall issue an order on any demand-side program plan and cost-recovery mechanisms within 180 days after submission to the commission. The commission may extend the approval period to 240 days for good cause. Consistent with K.S.A. 66-117(c), and amendments thereto, if the commission fails to issue a final order on such program plan and cost-recovery mechanism within 180 days, or 240 days if the approval period was extended by the commission for good cause, such program plan and cost-recovery mechanism shall be deemed approved by the commission and shall take effect on the proposed effective date contained in such plan.

(B) The public utility and the commission shall both have the independent authority to accept or reject any proposed establishment, continuation or modification of a demand-side program, portfolio of programs or associated cost-recovery or incentive mechanisms, but no such establishment, continuation or modification of such programs or mechanisms shall take effect without the approval of both the utility and the commission. If the public utility rejects modifications to a demand-side program or

portfolio of programs approved by the commission, including modifications to the cost-recovery mechanism, the public utility shall not be required to implement the program or mechanism.

(C) Upon final ruling of the commission order, the public utility has the right to reconsider and may withdraw its plan during the reconsideration period, which shall not exceed 30 calendar days from the date the final order was issued. Pursuant to K.S.A. 77-613, and amendments thereto, the time period for filing a petition for judicial review shall not begin until the completion of any such reconsideration period.

(D) In making its decision whether or not to approve the proposed program, the commission shall determine the appropriate test for evaluating the cost-effectiveness of the demand-side program. Programs targeted to low-income customers or general education campaigns do not need to meet a cost-effectiveness test, so long as the commission determines that the program or campaign is in the public interest and is supported by a reasonable budget in the context of the overall budget.

(2) The commission shall allow recovery of the reasonable and prudent costs associated with delivering commission-approved demand-side programs, so long as the program: (A) Results in energy or demand savings; and (B) is beneficial to customers in the customer class for which the programs were implemented, whether or not the program is utilized by all customers in such class. The fact that a commission-approved program proves not to be cost-effective is not by itself sufficient grounds for disallowing cost recovery. Programs determined to be non-cost-effective, other than programs targeted to low-income customers or general education campaigns, shall be modified to address deficiencies or terminated following such determination.

(d) (1) To comply with this section, the commission may allow cost recovery mechanisms that further encourage investments in demand-side programs. Such cost recovery mechanisms may include, but shall not be limited to: (A) Capitalization of investments in and expenditures for demand-side programs; (B) recovery of lost revenue associated with demand-side programs; (C) decoupling; (D) rate design modifications; (E) accelerated depreciation on demand-side investments; and (F) allowing the public utility to retain a portion of the net benefits of a demand-side program for its shareholders.

(2) In determining rates for electricity as part of a demand-side program, the commission shall fairly apportion the costs and benefits of such programs to each customer class.

(e) To achieve the goals of this act, the commission shall:

(1) Provide timely cost recovery for electric public utilities;

(2) ensure that the financial incentives for an electric public utility are aligned with helping such utility's customers use energy more efficiently and in a manner that sustains or enhances such customers' incentives to use energy more efficiently;

(3) provide timely earnings opportunities for public utilities associated with cost-effective, measurable and verifiable demand-side program savings;

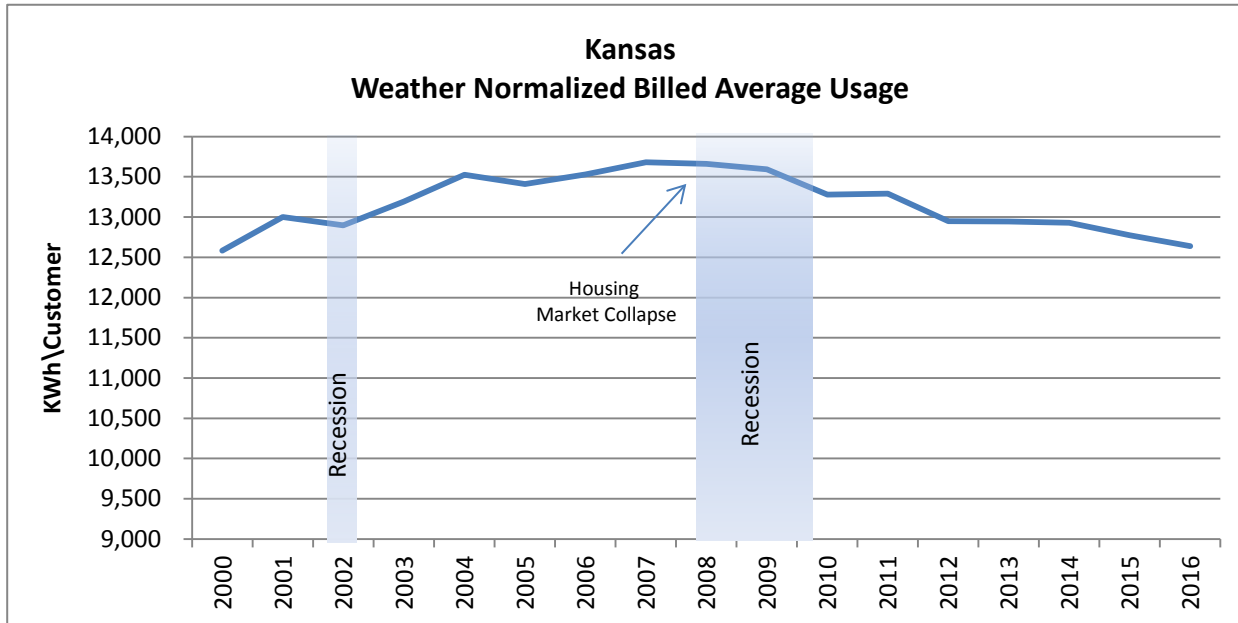
- (4) provide oversight and approval for utility-specific settlements and tariff provisions; and
- (5) provide independent evaluation of demand-side programs, as deemed necessary by the commission.
- (f) On or before May 31 of each year, each public utility shall submit an annual report to the commission describing the results of such demand-side programs for the previous calendar year. The report shall include:
 - (1) Program expenditures, including incentive payments;
 - (2) peak demand and energy savings impacts and the techniques used to estimate such impacts;
 - (3) avoided costs and the techniques used to estimate such costs;
 - (4) the estimated cost-effectiveness of the demand-side programs;
 - (5) the net economic benefits of the demand-side programs; and
 - (6) a comparison of the commission authorized program budget to actual costs.
- (g) The commission may adopt rules and regulations for the administration of this act.
- (h) This section shall be known and may be cited as the Kansas energy efficiency investment act.

History: L. 2014, ch. 66, § 1; July 1.

Kansas						
Year	KWh	KWh Yr/Yr Growth	# of Cust	Customer Yr/Yr Growth	AvgUse	AvgUse Yr/Yr Growth
2000	2,277,487,571		180,977		12,584	
2001	2,425,220,034	6.5%	186,531	3.1%	13,002	3.3%
2002	2,477,955,875	2.2%	192,148	3.0%	12,896	-0.8%
2003	2,589,477,030	4.5%	196,308	2.2%	13,191	2.3%
2004	2,698,747,885	4.2%	199,510	1.6%	13,527	2.5%
2005	2,718,933,279	0.7%	202,770	1.6%	13,409	-0.9%
2006	2,785,516,436	2.4%	205,887	1.5%	13,529	0.9%
2007	2,849,439,287	2.3%	208,290	1.2%	13,680	1.1%
2008	2,871,901,845	0.8%	210,229	0.9%	13,661	-0.1%
2009	2,872,154,136	0.0%	211,289	0.5%	13,593	-0.5%
2010	2,813,029,449	-2.1%	211,867	0.3%	13,277	-2.3%
2011	2,826,818,326	0.5%	212,707	0.4%	13,290	0.1%
2012	2,768,070,437	-2.1%	213,783	0.5%	12,948	-2.6%
2013	2,784,893,725	0.6%	215,103	0.6%	12,947	0.0%
2014	2,809,074,798	0.9%	217,295	1.0%	12,927	-0.1%
2015	2,810,824,807	0.1%	220,015	1.3%	12,776	-1.2%
2016	2,811,195,114	0.0%	222,425	1.1%	12,639	-1.1%

Compound Annual Growth Rates

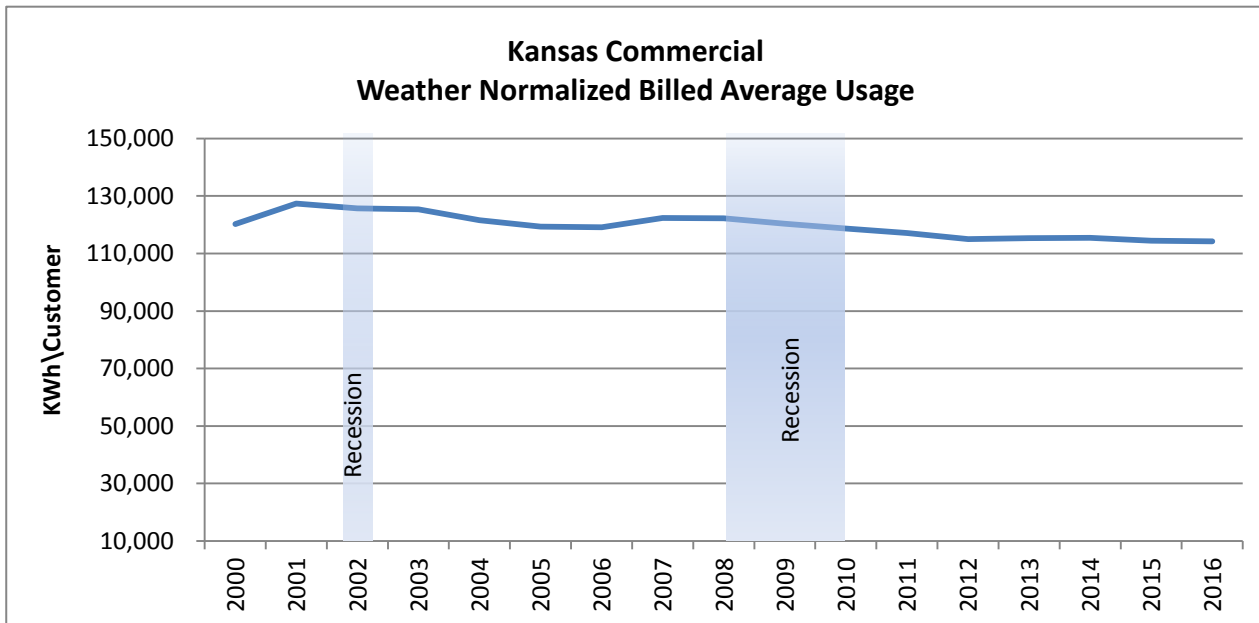
00—05	3.6%	2.3%	1.3%
05—10	0.7%	0.9%	-0.2%
10—15	0.0%	0.8%	-0.8%



Kansas						
Year	KWh	KWh Yr/Yr Growth	# of Cust	Customer Yr/Yr Growth	AvgUse	AvgUse Yr/Yr Growth
2000	2,534,781,339		21,073		120,284	
2001	2,746,797,982	8.4%	21,565	2.3%	127,372	5.9%
2002	2,792,421,766	1.7%	22,212	3.0%	125,714	-1.3%
2003	2,840,814,575	1.7%	22,659	2.0%	125,371	-0.3%
2004	2,918,700,935	2.7%	23,998	5.9%	121,621	-3.0%
2005	3,009,483,086	3.1%	25,207	5.0%	119,389	-1.8%
2006	3,066,947,148	1.9%	25,738	2.1%	119,158	-0.2%
2007	3,194,635,033	4.2%	26,119	1.5%	122,310	2.6%
2008	3,242,824,051	1.5%	26,520	1.5%	122,280	0.0%
2009	3,185,963,460	-1.8%	26,473	-0.2%	120,349	-1.6%
2010	3,164,822,547	-0.7%	26,668	0.7%	118,675	-1.4%
2011	3,149,657,249	-0.5%	26,889	0.8%	117,137	-1.3%
2012	3,108,070,203	-1.3%	27,022	0.5%	115,021	-1.8%
2013	3,156,660,892	1.6%	27,372	1.3%	115,325	0.3%
2014	3,217,368,328	1.9%	27,868	1.8%	115,450	0.1%
2015	3,223,936,913	0.2%	28,170	1.1%	114,447	-0.9%
2016	3,249,308,331	0.8%	28,437	0.9%	114,265	-0.2%

Compound Annual Growth Rates

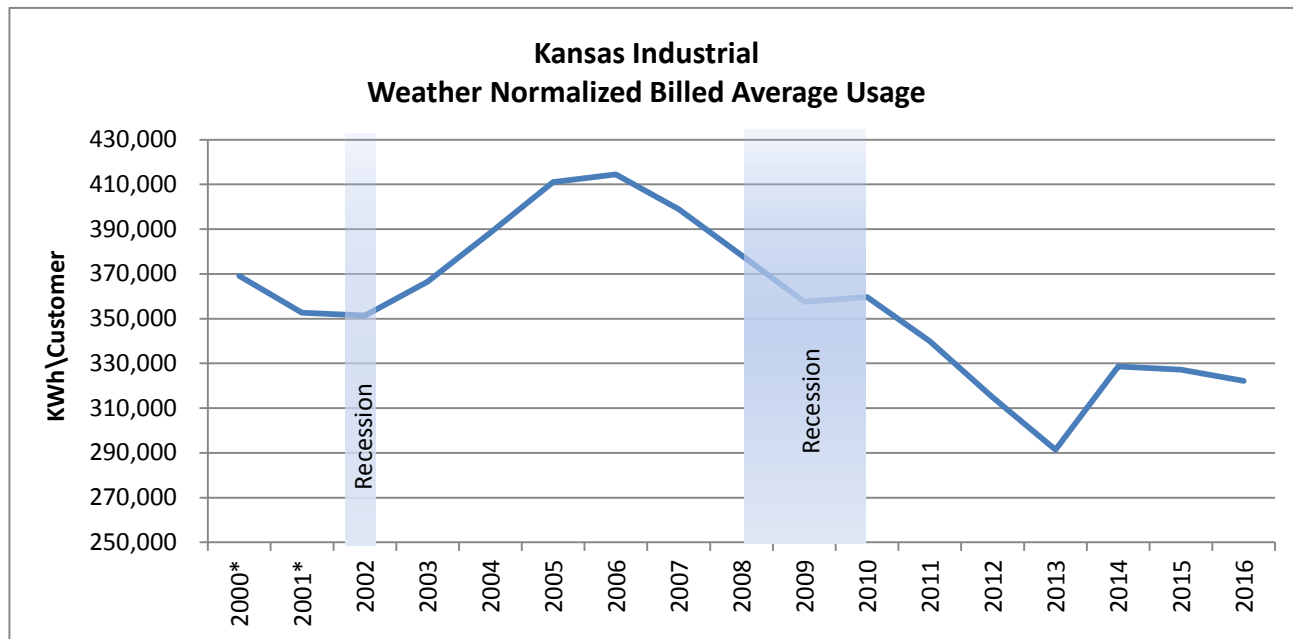
00—05	3.5%	3.6%	-0.1%
05—10	1.0%	1.1%	-0.1%
10—15	0.4%	1.1%	-0.7%



Kansas						
Year	KWh	KWh Yr/Yr Growth	# of Cust	Customer Yr/Yr Growth	AvgUse	AvgUse Yr/Yr Growth
2000*	408,285,623		1,106		369,183	
2001*	394,371,131	-3.4%	1,118	1.1%	352,616	-4.5%
2002	378,804,114	-3.9%	1,078	-3.6%	351,341	-0.4%
2003	391,139,578	3.3%	1,067	-1.0%	366,522	4.3%
2004	410,599,862	5.0%	1,057	-0.9%	388,397	6.0%
2005	432,359,076	5.3%	1,052	-0.5%	411,053	5.8%
2006	432,460,403	0.0%	1,043	-0.8%	414,532	0.8%
2007	408,518,613	-5.5%	1,024	-1.8%	398,944	-3.8%
2008	386,715,549	-5.3%	1,022	-0.2%	378,268	-5.2%
2009	359,094,415	-7.1%	1,004	-1.8%	357,515	-5.5%
2010	358,430,472	-0.2%	996	-0.8%	359,750	0.6%
2011	334,006,482	-6.8%	983	-1.4%	339,898	-5.5%
2012	304,246,506	-8.9%	966	-1.7%	314,873	-7.4%
2013	279,534,225	-8.1%	959	-0.7%	291,460	-7.4%
2014	314,758,956	12.6%	958	-0.1%	328,587	12.7%
2015	310,965,202	-1.2%	950	-0.8%	327,217	-0.4%
2016	301,034,751	-3.2%	934	-1.7%	322,163	-1.5%

Compound Annual Growth Rates

00—05	1.2%	-1.0%	2.2%
05—10	-3.7%	-1.1%	-2.6%
10—15	-2.8%	-0.9%	-1.9%



	A	B	C	D	E	F	G	H	I	J	K	L	M
1	Average Bill Comparisons												
2	Kansas, Missouri, Regional and Other Utilities												
3	12 Months Ending 06/30/2016												
4	Source: EEI Typical Bill Rankings Report and Typ Bill/Avg Rates Report												
5													
6								National Rankings for Average Rates					
7	Average Cents per kWh							(1 = Lowest Average Rate)					
8													
9	Utility	State	Total Retail	Residential	Commercial	Industrial		Utility	State	Total Retail	Residential	Commercial	Industrial
10	Westar Energy-KPL	Kansas	10.42	12.64	9.77	8.07		Westar Energy-KPL	Kansas	93	99	81	108
11	Westar Energy-KGE	Kansas	9.75	12.56	9.75	7.16		Westar Energy-KGE	Kansas	77	94	80	84
12	Empire District Electric - KS	Kansas	0.00	0.00	0.00	0.00		Empire District Electric - KS	Kansas	n/a	n/a	n/a	n/a
13	Kansas City Power & Light	Kansas	11.28	12.74	10.10	9.45		Kansas City Power & Light	Kansas	112	100	89	130
14	Kansas City Power & Light	Missouri	9.88	12.27	9.54	7.09		Kansas City Power & Light	Missouri	81	88	73	80
15	KCP&L - Total		10.48	12.51	9.78	7.47		KCP&L - Total		95	92	82	90
16	AmerenUE - MO	Missouri	8.71	10.86	8.10	5.80		AmerenUE - MO	Missouri	46	50	20	27
17	KCP&L GMO - MPS	Missouri	9.77	11.66	8.76	6.40		KCP&L GMO - MPS	Missouri	78	79	37	50
18	KCP&L GMO - L&P	Missouri	9.19	11.15	9.19	6.93		KCP&L GMO - L&P	Missouri	62	65	57	77
19	Empire District Electric - MO	Missouri	0.00	0.00	0.00	0.00		Empire District Electric - MO	Missouri	n/a	n/a	n/a	n/a
20	MidAmerican Energy - IA	Iowa	6.78	9.91	7.54	4.86		MidAmerican Energy - IA	Iowa	9	27	11	8
21	Northern States Power - MN	Minnesota	10.02	12.87	9.62	7.58		Northern States Power - MN	Minnesota	83	103	76	93
22	Minnesota Power - MN	Minnesota	7.67	10.34	9.28	6.82		Minnesota Power - MN	Minnesota	20	37	61	71
23	Regional Avg. (1)		9.15	11.75	9.16	6.53		Regional Avg. (1)		60	81	55	58
24													
25	Ameren Illinois Rate Zone 2 (formerly CILCO) - IL	Illinois	n/a	11.32	9.01	n/a		Ameren Illinois Rate Zone 2 (formerly CILCO) - IL	Illinois	n/a	72	49	n/a
26	Ameren Illinois Rate Zone 1 (formerly CIPS) - IL	Illinois	n/a	11.19	8.61	n/a		Ameren Illinois Rate Zone 1 (formerly CIPS) - IL	Illinois	n/a	68	30	n/a
27	Commonwealth Edison - IL (total rate)	Illinois	11.30	12.83	9.39	5.56		Commonwealth Edison - IL (total rate)	Illinois	113	102	66	21
28	Public Service Co. - OK	Oklahoma	6.81	9.01	6.99	4.41		Public Service Co. - OK	Oklahoma	11	13	2	2
29	OG&E Electric Service - OK	Oklahoma	7.50	10.03	7.29	4.90		OG&E Electric Service - OK	Oklahoma	19	30	5	9
30	Public Service Co. - CO	Colorado	9.27	11.32	9.13	14.71		Public Service Co. - CO	Colorado	65	71	53	151
31													
32	Idaho Power - ID	Idaho	8.02	10.19	7.45	5.58		Idaho Power - ID	Idaho	27	33	8	22
33	PacifiCorp - ID	Idaho	8.17	10.45	8.82	7.30		PacifiCorp - ID	Idaho	33	39	38	88
34	Kentucky Utilities - KY	Kentucky	8.35	9.91	9.74	6.20		Kentucky Utilities - KY	Kentucky	39	28	79	41
35	AEP - (Kingsport) - TN	Tennessee	6.98	8.22	8.08	5.55		AEP - (Kingsport) - TN	Tennessee	13	4	18	20
36	AEP (Appalachian Power) - VA (total rate)	Virginia	9.19	11.25	8.92	6.83		AEP (Appalachian Power) - VA (total rate)	Virginia	63	70	43	74
37													
38	San Diego Gas & Electric (total rate)	California	20.17	21.31	21.20	16.34		San Diego Gas & Electric (total rate)	California	159	161	164	156
39	Pacific Gas & Electric - CA	California	16.02	17.94	16.93	9.97		Pacific Gas & Electric - CA	California	149	151	159	135
40	Con Ed - NY	New York	22.47	25.22	19.49	16.84		Con Ed - NY	New York	162	164	163	157
41	Maui Electric Co (Molokai) - HI	Hawaii	32.40	33.99	35.35	26.21		Maui Electric Co (Molokai) - HI	Hawaii	165	168	168	162
42													
43	National Avg.		10.68	12.99	10.74	6.92		National Avg.		97	106	98	76
44	National Low		5.85	7.85	6.72	4.26		National Low		1	1	1	1
45	National High		34.65	34.53	37.46	32.94		National High		166	169	169	163
46													

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	Average Bill Comparisons												
2	Kansas, Missouri, Regional and Other Utilities												
3	12 Months Ending 06/30/2016												
4	Source: EEI Typical Bill Rankings Report and Typ Bill/Avg Rates Report												
5													
47	GENERAL NOTES:							PEER REGIONAL RANKING NOTES:					
48	1. The West North Central region includes Iowa, Kansas, Minnesota, Missouri, North Dakota, and South Dakota.							Peer Regional Rankings is a subset of the West North Central Region utilities.					
49	2. Ameren IL rate zones 1 and 2 stopped reporting Retail and Industrial rates in 2006.							Ameren UE - MO has the 3 rd lowest total retail and residential rates in the region. And has the 2 nd lowest commercial and industrial rates in the region. Ameren UE is above the regional average on retail, residential, commercial and industrial rates.					
50	3. Empire Distric Electric - KS and MO stopped reporting Summer 2016.							KCPL-KS has the 11 th lowest total retail, commercial and industrial rates in the region. The residential retail is the 10 th lowest in the region. The total retail, residential, commercial and industrial rates are below the regional average rates.					
51								KCP&L GMO - L&P has the 4 th lowest total retail, residential and commercial rates in the region. And has the 5 th lowest industrial rates in the region. KCP&L GMO - L&P is below the regional average on retail, commercial and industrial rates. And above the regional average on residential rates.					
52	KCP&L RESULTS VS LAST COMPARISON:							KCPL-MO has the 7th lowest total retail rates in the region. And has the 6th lowest residential, commercial and industrial rates in the region. KCP&L MO is below the regional average on retail, residential, commercial and industrial rates.					
53	KCP&L-KS - All classes but industrial have declined; total retail declined 1 places, residential declined 2 places, commercial declined 3 places, and industrial improved 2 places.							KCP&L GMO - MPS has the 6th lowest total retail rates in the region. And has the 5th lowest residential rates in the regions. And has the 3 rd lowest commercial and industrial rates in the region. KCP&L GMO - MPS is below the regional average on retail and above the regional average on residential, commercial and industrial rates.					
54	KCP&L-MO - All classes have declined; total retail declined 10 places, residential declined 4 places, commercial declined 23 places, and industrial declined 12 places.							KCPL-MO total retail rates are about 13% higher than AmerenUE-MO total retail rates.					
55	GMO-MPS - All classes have improved; total retail improved 11 places, residential improved 7 places, commercial improved 12 places, and industrial improved 12 places.							KCPL-KS total retail rates are about 8% higher than Westar Energy-KPL total retail rates.					
56	GMO-L&P - All classes have improved; total retail improved10 places, residential improved 8 places, commercial improved10 places, and industrial improved 4 places.							KCPL-KS total retail rates are about 16% higher than Westar Energy-KGE total retail rates.					
57													
58								NATIONAL NOTES:					
59								1. SW Public - TX has the lowest retail and industrial rates.					
60								2. OG&E - AR has the lowest residential and commercial rates.					
61								3. Con-Ed - NY has the highest retail and residential					
62								4. San Diego - CA has the highest commercial					
63								5. Atlantic - NJ has the highest industrial mainland rates.					
64													
65													

Residential Typical Bill Comparisons (\$)

Utility	Winter			Summer			Winter			Summer			Winter			Summer			Avg. Bill W/S		Avg. Bill W/S		
	Effective January 1, 2014			Effective July 1, 2014			Effective January 1, 2015			Effective July 1, 2015			Effective January 1, 2016			Effective July 1, 2016			750/750	Rank	750/1000	Rank	
	500 kWh	750 kWh	1000 kWh	500 kWh	750 kWh	1000 kWh	500 kWh	750 kWh	1000 kWh	500 kWh	750 kWh	1000 kWh	500 kWh	750 kWh	1000 kWh	500 kWh	750 kWh	1000 kWh					
Missouri																							
KCP&L GMO - L&P	65.65	90.91	112.01	72.30	103.67	135.04	65.70	90.99	112.12	72.82	104.46	136.09	66.71	92.51	114.14	69.70	99.79	129.86	97.36	11	104.96	10	
Ameren UE	52.30	74.43	89.81	68.82	99.21	129.60	52.87	75.28	90.95	73.93	106.88	139.83	56.44	80.65	97.73	69.44	100.14	130.85	93.64	8	97.38	6	
KCP&L - MO	63.65	84.40	100.78	69.79	100.18	130.57	65.64	87.39	104.76	71.78	103.17	134.55	72.45	95.53	113.82	80.60	114.95	149.31	108.48	17	113.46	17	
KCP&L GMO - MPS	68.79	92.70	113.10	68.79	98.46	128.46	69.73	94.10	114.97	69.73	99.86	130.33	70.81	95.73	117.14	67.00	95.78	124.88	95.76	10	105.45	11	
Empire District Electric - MO	70.23	95.85	119.33	70.97	100.20	129.42	70.65	96.48	120.17	70.00	98.74	127.48	73.13	100.00	124.57	n/a	n/a	n/a					
Kansas																							
Westar - KPL (Total Rate)	63.38	89.06	113.59	65.87	92.79	120.85	65.87	92.80	118.56	65.55	92.33	120.22	70.00	97.75	124.10	71.37	99.81	129.02	99.12	12	108.17	12	
Westar - KGE (Total Rate)	63.38	89.06	113.59	65.87	92.79	120.85	65.87	92.80	118.56	65.55	92.33	120.22	70.00	97.75	124.10	71.37	99.81	129.02	99.12	12	108.17	12	
KCP&L - KS	59.20	83.56	107.91	70.42	100.39	130.35	60.07	84.74	109.42	74.20	105.94	137.68	66.62	92.93	119.23	80.99	114.48	147.96	107.30	16	111.27	14	
Empire District Electric - KS	62.86	86.16	108.73	65.77	90.54	114.56	63.93	87.78	110.88	66.72	91.96	116.46	64.79	89.07	112.60	n/a	n/a	n/a					
Iowa																							
MidAmerican Energy (South System)	53.30	75.24	97.18	55.84	79.06	102.28	51.72	73.33	94.93	64.07	91.85	119.64	52.49	74.47	96.47	65.96	94.66	123.39	87.93	5	90.78	5	
Minnesota																							
Northern States Power	66.97	95.83	124.69	71.75	103.01	134.26	64.86	92.67	120.48	71.27	102.38	133.48	69.63	99.76	129.90	74.14	106.53	138.93	104.27	15	112.82	15	
Minnesota Power	48.52	74.56	101.29	49.08	75.40	102.42	48.72	74.86	101.69	50.41	77.40	105.08	49.70	76.33	103.65	51.21	78.60	106.68	77.84	2	86.45	3	
Illinois (East North Central)																							
Ameren Illinois Rate Zone I (formerly CIPS)	49.07	65.71	80.70	52.26	70.49	88.71	51.63	69.49	84.66	66.90	92.47	118.05	67.00	91.81	109.87	70.85	97.45	124.06	95.57	9	102.56	8	
Commonwealth Edison	57.96	82.74	103.69	69.04	99.33	125.71	71.81	102.03	130.42	69.46	98.55	125.83	66.86	96.80	123.83	62.82	90.75	115.76	92.77	7	103.12	9	
Oklahoma (West South Central)																							
OG&E Electric Service	60.88	78.31	91.75	60.73	84.08	107.44	64.50	83.75	98.99	63.95	86.09	106.23	58.13	77.34	94.55	61.31	82.34	101.37	80.67	3	85.35	2	
Public Service Co.	41.30	65.94	80.96	43.96	75.53	95.31	42.87	68.30	84.10	45.61	77.18	95.12	45.61	77.18	95.12	41.71	71.57	87.81	73.44	1	80.72	1	
Colorado (Mountain)																							
Public Service Co.	7	57.55	82.32	107.07	58.89	97.43	135.96	56.77	81.25	105.71	52.10	86.77	121.42	54.25	77.45	100.64	60.12	86.32	112.53	83.36	4	89.14	4
West North Central																							
	57.69	81.03	102.64	61.91	88.18	114.34	59.48	83.60	106.30	64.34	91.68	118.92	61.26	85.95	109.15	65.41	93.28	121.20	90.84	6	97.70	7	
USA																							
	69.40	100.28	130.54	72.25	105.10	138.10	72.53	104.43	136.01	72.39	104.72	137.29	70.68	101.68	132.12	71.38	103.19	135.33	102.69	14	112.90	16	

NOTES:
1. Avg Bill Source: EEI Typical Bills and Average Rates Reports - [Winter 2015](#) and [Summer 2016](#).
2. The West North Central Region includes: Missouri, Kansas, Iowa, Minnesota, South Dakota, and North Dakota
3. Empire District Electric KS and MO stopped reporting Summer 2016

Residential Typical Bill Comparisons
(Cents/kWh)

Utility	Winter			Summer			Winter			Summer			Winter			Summer			Avg. Bill		Avg. Bill	
	Effective January 1, 2014			Effective July 1, 2014			Effective January 1, 2015			Effective July 1, 2015			Effective January 1, 2016			Effective July 1, 2016			W/S		W/S	
	500 kWh	750 kWh	1000 kWh	500 kWh	750 kWh	1000 kWh	500 kWh	750 kWh	1000 kWh	500 kWh	750 kWh	1000 kWh	500 kWh	750 kWh	1000 kWh	500 kWh	750 kWh	1000 kWh	750/750	Rank	750/1000	Rank
Missouri																						
KCP&L GMO - L&P	13.13	12.12	11.20	14.46	13.82	13.50	13.14	12.13	11.21	14.56	13.93	13.61	13.34	12.33	11.41	13.94	13.31	12.99	12.66	10	12.55	10
Ameren UE	10.46	9.92	8.98	13.76	13.23	12.96	10.57	10.04	9.10	14.79	14.25	13.98	11.29	10.75	9.77	13.89	13.35	13.09	11.62	6	11.53	6
KCP&L - MO	12.73	11.25	10.08	13.96	13.36	13.06	13.13	11.65	10.48	14.36	13.76	13.46	14.49	12.74	11.38	16.12	15.33	14.93	13.60	15	13.47	15
KCP&L GMO - MPS	13.76	12.36	11.31	13.76	13.13	12.85	13.95	12.55	11.50	13.95	13.31	13.03	14.16	12.76	11.71	13.40	12.77	12.49	12.76	11	12.67	11
Empire District Electric	14.05	12.78	11.93	14.19	13.36	12.94	14.13	12.86	12.02	14.00	13.17	12.75	14.63	13.33	12.46	n/a	n/a	n/a				
Kansas																						
Westar - KPL	12.68	11.87	11.36	13.17	12.37	12.09	13.17	12.37	11.86	13.11	12.31	12.02	14.00	13.03	12.41	14.27	13.31	12.90	13.12	12	12.99	12
Westar - KGE	12.68	11.87	11.36	13.17	12.37	12.09	13.17	12.37	11.86	13.11	12.31	12.02	14.00	13.03	12.41	14.27	13.31	12.90	13.12	12	12.99	12
KCP&L - KS	11.84	11.14	10.79	14.08	13.39	13.04	12.01	11.30	10.94	14.84	14.13	13.77	13.32	12.39	11.92	16.20	15.26	14.80	13.35	14	13.19	14
Empire District Electric	12.57	11.49	10.87	13.15	12.07	11.46	12.79	11.70	11.09	13.34	12.26	11.65	12.96	11.88	11.26	n/a	n/a	n/a				
Iowa																						
MidAmerican Energy (South System)	10.66	10.03	9.72	11.17	10.54	10.23	10.34	9.78	9.49	12.81	12.25	11.96	10.50	9.93	9.65	13.19	12.62	12.34	10.83	5	10.73	5
Minnesota																						
Northern States Power	13.39	12.78	12.47	14.35	13.73	13.43	12.97	12.36	12.05	14.25	13.65	13.35	13.93	13.30	12.99	14.83	14.20	13.89	13.60	15	13.50	16
Minnesota Power	9.70	9.94	10.13	9.82	10.05	10.24	9.74	9.98	10.17	10.08	10.32	10.51	9.94	10.18	10.37	10.24	10.48	10.67	10.28	2	10.34	3
Illinois																						
Ameren CIPS	9.81	8.76	8.07	10.45	9.40	8.87	10.33	9.27	8.47	13.38	12.33	11.81	13.40	12.24	10.99	14.17	12.99	12.41	12.49	8	12.30	8
Commonwealth Edison	11.59	11.03	10.37	13.81	13.24	12.57	14.36	13.60	13.04	13.89	13.14	12.58	13.37	12.91	12.38	12.56	12.10	11.58	12.64	9	12.47	9
Oklahoma																						
OG&E Eelectric Service	12.18	10.44	9.18	12.15	11.21	10.74	12.90	11.17	9.90	12.79	11.48	10.62	11.63	10.31	9.46	12.26	10.98	10.14	10.53	3	10.25	2
Public Service Co.	8.26	8.79	8.10	8.79	10.07	9.53	8.57	9.11	8.41	9.12	10.29	9.51	9.12	10.29	9.51	8.34	9.54	8.78	10.04	1	9.79	1
Colorado																						
Public Service Co.	11.51	10.98	10.71	11.78	12.99	13.60	11.35	10.83	10.57	10.42	11.57	12.14	10.85	10.33	10.06	12.02	11.51	11.25	10.72	4	10.64	4
West North Central																						
	11.54	10.80	10.26	12.38	11.76	11.43	11.90	11.15	10.63	12.87	12.22	11.89	12.25	11.46	10.92	13.08	12.44	12.12	11.79	7	11.68	7
USA																						
	13.88	13.37	13.05	14.45	14.01	13.81	14.51	13.92	13.60	14.48	13.96	13.73	14.14	13.56	13.21	14.28	13.76	13.53	13.63	17	13.55	17

NOTES:
1. Avg Bill Source: EEI Typical Bills and Average Rates Reports - [Winter 2015](#) and [Summer 2016](#).
2. The West North Central Region includes: Missouri, Kansas, Iowa, Minnesota, South Dakota, and North Dakota
3. Empire District Electric KS and MO stopped reporting Summer 2016

Edison Electric Institute
Average Rates
(in cents/kilowatt hours)

Ranking of Total Retail Average Rates
12 Months Ending 6/30/2016

Ranking	Company	State	Avg Rate
1	Southwestern Public Service	Texas	5.85
2	MidAmerican Energy	South Dakota	6.06
3	Entergy Louisiana, LLC (formerly Entergy Gulf States, Inc.)	Louisiana	6.37
4	Black Hills Power, Inc. d/b/a Black Hills Energy	Montana	6.50
5	Southwestern Public Service	New Mexico	6.51
6	OG&E Electric Services	Arkansas	6.52
7	Entergy Louisiana, Inc.	Louisiana	6.58
8	AEP (Wheeling Power Rate Area)	West Virginia	6.71
9	MidAmerican Energy	Iowa	6.78
10	Montana-Dakota Utilities Company	Montana	6.80
11	Public Service Company of Oklahoma	Oklahoma	6.81
12	We Energies (formerly Wisconsin Electric)	Michigan	6.97
13	AEP (Kingsport Power Rate Area)	Tennessee	6.98
14	Southwestern Electric Power Company	Arkansas	7.09
15	Entergy Texas	Texas	7.20
16	PacifiCorp	Wyoming	7.43
17	Superior Water, Light & Power Company	Wisconsin	7.46
18	Southwestern Electric Power Company	Texas	7.46
19	OG&E Electric Services	Oklahoma	7.50
20	Minnesota Power Company	Minnesota	7.67
21	Otter Tail Power Company	South Dakota	7.72
22	Duke Energy Kentucky	Kentucky	7.80
23	Otter Tail Power Company	Minnesota	7.87
24	MidAmerican Energy	Illinois	7.92
25	Duke Energy Progress, Inc.	South Carolina	7.94
26	Idaho Power Company	Oregon	7.95
27	Idaho Power Company	Idaho	8.02
28	Wisconsin Public Service Corporation	Michigan	8.03
29	Sierra Pacific Power Company - NV Energy	Nevada	8.06
30	Otter Tail Power Company	North Dakota	8.11
31	Duke Energy Carolinas	South Carolina	8.11
32	AEP (Indiana Michigan Power)	Indiana	8.15
33	PacifiCorp	Idaho	8.17
34	PacifiCorp	Washington	8.18
35	Mississippi Power Company	Mississippi	8.22
36	Dominion North Carolina Power	North Carolina	8.25
37	Avista Corp.	Idaho	8.27
38	Toledo Edison Company	Ohio	8.34
39	Kentucky Utilities Company	Kentucky	8.35
40	PacifiCorp	Utah	8.37
41	Entergy Mississippi, Inc.	Mississippi	8.38
42	Monongahela Power Company	West Virginia	8.39
43	Duke Energy Carolinas	North Carolina	8.49
44	Duke Energy Indiana	Indiana	8.64
45	Entergy Arkansas, Inc.	Arkansas	8.66
46	Ameren Missouri	Missouri	8.71
47	Entergy New Orleans, Inc.	Louisiana	8.74
48	Montana-Dakota Utilities Company	North Dakota	8.80
49	Avista Corp.	Washington	8.83
50	Northwestern Energy	South Dakota	8.84
51	Montana-Dakota Utilities Company	Wyoming	8.85
52	Dominion Virginia Power	Virginia	8.85
53	Southwestern Electric Power Company	Louisiana	8.89
54	AEP (Appalachian Power Rate Area)	West Virginia	8.92
55	Northern Indiana Public Service Company	Indiana	9.02
56	Potomac Edison Company	West Virginia	9.06
57	Georgia Power Company	Georgia	9.06
58	Indianapolis Power & Light Company	Indiana	9.11
59	Louisville Gas & Electric Company	Kentucky	9.12

Edison Electric Institute
Average Rates
(in cents/kilowatt hours)

Ranking of Total Retail Average Rates
12 Months Ending 6/30/2016

Ranking	Company	State	Avg Rate
60	West North Central		9.15
61	Duke Energy Progress, Inc.	North Carolina	9.16
62	Kansas City Power & Light - L&P	Missouri	9.19
63	AEP (Appalachian Power Rate Area)	Virginia	9.19
64	West Penn Power Company	Pennsylvania	9.22
65	Public Service Company of Colorado	Colorado	9.27
66	Wisconsin Public Service Corporation	Wisconsin	9.30
67	AEP (Kentucky Power Rate Area)	Kentucky	9.35
68	Old Dominion Power Company	Virginia	9.40
69	El Paso Electric Company	Texas	9.42
70	Northern States Power Company (MN)	North Dakota	9.43
71	Alabama Power Company	Alabama	9.44
72	AEP (Indiana Michigan Power combined MI rate areas)	Michigan	9.45
73	Montana-Dakota Utilities Company	South Dakota	9.48
74	Florida Power & Light Company	Florida	9.53
75	PacifiCorp	Oregon	9.54
76	Portland General Electric Company	Oregon	9.61
77	Westar Energy-KGE	Kansas	9.75
78	Kansas City Power & Light - MPS	Missouri	9.77
79	Black Hills Power, Inc. d/b/a Black Hills Energy	Wyoming	9.78
80	Interstate Power & Light	Iowa	9.79
81	Kansas City Power & Light Company	Missouri	9.88
82	CLECO Power LLC	Louisiana	9.96
83	Northern States Power Company (MN)	Minnesota	10.02
84	Northern States Power Company (MN)	South Dakota	10.07
85	Nevada Power Company - NV Energy	Nevada	10.12
86	Potomac Edison Company	Maryland	10.19
87	Northern States Power Company (WI)	Wisconsin	10.25
88	WP&L	Wisconsin	10.25
89	Southern Indiana Gas & Electric Company	Indiana	10.29
90	Public Service Company of New Mexico	New Mexico	10.35
91	Tampa Electric Company	Florida	10.35
92	Puget Sound Energy	Washington	10.39
93	Westar Energy-KPL	Kansas	10.42
94	Unisource Electric Company	Arizona	10.45
95	Tucson Electric Power Company	Arizona	10.49
96	UGI Utilities, Inc.	Pennsylvania	10.50
97	US average	USA	10.68
98	Cheyenne Light, Fuel & Power d/b/a Black Hills Energy	Wyoming	10.74
99	Northern States Power Company (WI)	Michigan	10.76
100	El Paso Electric Company	New Mexico	10.84
101	AEP (Ohio Power Rate Area)	Ohio	10.89
102	Duke Energy Florida	Florida	10.95
103	DTE Electric Company	Michigan	10.99
104	Dayton Power & Light Company	Ohio	11.03
105	Ohio Edison Company	Ohio	11.03
106	New York State Electric & Gas Corporation	New York	11.04
107	Metropolitan Edison Company	Pennsylvania	11.13
108	Pennsylvania Electric Company	Pennsylvania	11.15
109	Pennsylvania Power Company	Pennsylvania	11.25
110	AEP (Columbus Southern Power Rate Area)	Ohio	11.25
111	Duquesne Light Company	Pennsylvania	11.28
112	Kansas City Power & Light Company	Kansas	11.28
113	Commonwealth Edison Company	Illinois	11.30
114	PPL Utilities Corp.	Pennsylvania	11.31
115	Northwestern Wisconsin Electric Company	Wisconsin	11.46
116	NorthWestern Energy (formerly Montana Power)	Montana	11.49
117	South Carolina Electric & Gas Company	South Carolina	11.49
118	Gulf Power Company	Florida	11.74

Edison Electric Institute
Average Rates
(in cents/kilowatt hours)

Ranking of Total Retail Average Rates
12 Months Ending 6/30/2016

Ranking	Company	State	Avg Rate
119	Duke Energy Ohio	Ohio	11.74
120	Arizona Public Service Company	Arizona	11.78
121	We Energies (formerly Wisconsin Electric)	Wisconsin	11.88
122	National Grid (Niagara Mohawk Power Corporation)	New York	11.89
123	Cleveland Electric Illuminating Company	Ohio	11.98
124	Delmarva Power	Delaware	12.07
125	Consumers Energy	Michigan	12.20
126	Black Hills Power, Inc. d/b/a Black Hills Energy	South Dakota	12.43
127	Rochester Gas & Electric Corporation	New York	12.50
128	Madison Gas & Electric Company	Wisconsin	12.61
129	Emera Maine - Maine Public District	Maine	12.62
130	Black Hills/Colorado Electric	Colorado	12.65
131	Delmarva Power	Maryland	12.66
132	PECO Energy	Pennsylvania	12.75
133	Potomac Electric Power Company	District of Columbia	12.87
134	Jersey Central Power & Light Company	New Jersey	12.93
135	Baltimore Gas & Electric Company	Maryland	12.94
136	Potomac Electric Power Company	Maryland	13.47
137	Pike County Light & Power Company	Pennsylvania	13.69
138	Green Mountain Power	Vermont	13.96
139	PacifiCorp	California	14.16
140	Florida Public Utilities Company	Florida	14.37
141	Unitil Energy Systems, Inc.	New Hampshire	14.70
142	Rockland Electric Company	New Jersey	14.87
143	Public Service Electric & Gas Company	New Jersey	14.87
144	Southern California Edison	California	15.22
145	Emera Maine - Bangor Hydro District	Maine	15.29
146	Central Hudson Gas & Electric Corporation	New York	15.32
147	Public Service Company of New Hampshire d/b/a Eversource Energy	New Hampshire	15.94
148	Cambridge Electric Company	Massachusetts	15.96
149	Pacific Gas & Electric Company	California	16.02
150	Western Massachusetts Electric Company	Massachusetts	17.06
151	Narragansett Electric Company	Rhode Island	17.17
152	Connecticut Light & Power Company	Connecticut	17.32
153	Atlantic City Electric Company	New Jersey	17.53
154	National Grid (Massachusetts Electric Company)	Massachusetts	17.87
155	Orange & Rockland Utilities, Inc.	New York	18.21
156	Boston Edison Company	Massachusetts	18.27
157	United Illuminating Company	Connecticut	19.20
158	Fitchburg Gas & Electric Light Company	Massachusetts	19.25
159	San Diego Gas & Electric Company	California	20.17
160	Commonwealth Electric Company	Massachusetts	20.72
161	Hawaiian Electric Company	Hawaii	22.38
162	Consolidated Edison Company of New York	New York	22.47
163	Maui Electric Company (Maui)	Hawaii	27.65
164	Hawaii Electric Light Company	Hawaii	29.60
165	Maui Electric Company (Molokai)	Hawaii	32.40
166	Maui Electric Company (Lanai)	Hawaii	34.65
167	Ameren Illinois Rate Zone III (formerly IP)	Illinois	
168	Ameren Illinois Rate Zone II (formerly CILCO)	Illinois	
169	Ameren Illinois Rate Zone I (formerly CIPS)	Illinois	

Edison Electric Institute
Average Rates
(in cents/kilowatt hours)

Ranking of Total Residential Average Rates
12 Months Ending 6/30/2016

Ranking	Company	State	Avg Rate
1	OG&E Electric Services	Arkansas	7.85
2	Black Hills Power, Inc. d/b/a Black Hills Energy	Montana	7.92
3	MidAmerican Energy	South Dakota	8.02
4	AEP (Kingsport Power Rate Area)	Tennessee	8.22
5	Entergy Louisiana, LLC (formerly Entergy Gulf States, Inc.)	Louisiana	8.55
6	Avista Corp.	Washington	8.69
7	Montana-Dakota Utilities Company	Montana	8.70
8	Duke Energy Kentucky	Kentucky	8.76
9	PacifiCorp	Washington	8.78
10	Entergy Louisiana, Inc.	Louisiana	8.78
11	Otter Tail Power Company	North Dakota	8.87
12	Southwestern Electric Power Company	Arkansas	8.91
13	Public Service Company of Oklahoma	Oklahoma	9.01
14	Entergy Mississippi, Inc.	Mississippi	9.13
15	Southwestern Public Service	New Mexico	9.15
16	Avista Corp.	Idaho	9.34
17	Otter Tail Power Company	South Dakota	9.35
18	Southwestern Electric Power Company	Texas	9.43
19	Montana-Dakota Utilities Company	North Dakota	9.55
20	Old Dominion Power Company	Virginia	9.67
21	Entergy New Orleans, Inc.	Louisiana	9.71
22	Northwestern Energy	South Dakota	9.74
23	Southwestern Public Service	Texas	9.81
24	Indianapolis Power & Light Company	Indiana	9.81
25	Entergy Texas	Texas	9.81
26	Southwestern Electric Power Company	Louisiana	9.88
27	MidAmerican Energy	Iowa	9.91
28	Kentucky Utilities Company	Kentucky	9.91
29	Idaho Power Company	Oregon	10.00
30	OG&E Electric Services	Oklahoma	10.03
31	Otter Tail Power Company	Minnesota	10.09
32	Duke Energy Progress, Inc.	South Carolina	10.09
33	Idaho Power Company	Idaho	10.19
34	Montana-Dakota Utilities Company	South Dakota	10.23
35	Montana-Dakota Utilities Company	Wyoming	10.23
36	Potomac Edison Company	West Virginia	10.23
37	Minnesota Power Company	Minnesota	10.34
38	Louisville Gas & Electric Company	Kentucky	10.43
39	PacifiCorp	Idaho	10.45
40	Entergy Arkansas, Inc.	Arkansas	10.45
41	Florida Power & Light Company	Florida	10.49
42	Unisource Electric Company	Arizona	10.58
43	Northern States Power Company (MN)	North Dakota	10.59
44	Duke Energy Carolinas	North Carolina	10.60
45	AEP (Indiana Michigan Power combined MI rate areas)	Michigan	10.65
46	Monongahela Power Company	West Virginia	10.66
47	MidAmerican Energy	Illinois	10.66
48	Dominion North Carolina Power	North Carolina	10.68
49	PacifiCorp	Oregon	10.80
50	Ameren Missouri	Missouri	10.86
51	AEP (Appalachian Power Rate Area)	West Virginia	10.89
52	Sierra Pacific Power Company - NV Energy	Nevada	10.93
53	Duke Energy Indiana	Indiana	10.95
54	Potomac Edison Company	Maryland	11.01
55	Duke Energy Progress, Inc.	North Carolina	11.02
56	Wisconsin Public Service Corporation	Michigan	11.02
57	Puget Sound Energy	Washington	11.03
58	UGI Utilities, Inc.	Pennsylvania	11.05
59	West Penn Power Company	Pennsylvania	11.06

Edison Electric Institute
Average Rates
(in cents/kilowatt hours)

Ranking of Total Residential Average Rates
12 Months Ending 6/30/2016

Ranking	Company	State	Avg Rate
60	Duke Energy Carolinas	South Carolina	11.07
61	AEP (Indiana Michigan Power)	Indiana	11.07
62	PacifiCorp	Utah	11.11
63	CLECO Power LLC	Louisiana	11.11
64	PacifiCorp	Wyoming	11.14
65	Kansas City Power & Light - L&P	Missouri	11.15
66	Superior Water, Light & Power Company	Wisconsin	11.16
67	AEP (Wheeling Power Rate Area)	West Virginia	11.17
68	Ameren Illinois Rate Zone I (formerly CIPS)	Illinois	11.19
69	Dominion Virginia Power	Virginia	11.22
70	AEP (Appalachian Power Rate Area)	Virginia	11.25
71	Public Service Company of Colorado	Colorado	11.32
72	Ameren Illinois Rate Zone II (formerly CILCO)	Illinois	11.32
73	El Paso Electric Company	Texas	11.37
74	Tampa Electric Company	Florida	11.40
75	AEP (Kentucky Power Rate Area)	Kentucky	11.40
76	Tucson Electric Power Company	Arizona	11.42
77	Portland General Electric Company	Oregon	11.42
78	New York State Electric & Gas Corporation	New York	11.48
79	Kansas City Power & Light - MPS	Missouri	11.66
80	NorthWestern Energy (formerly Montana Power)	Montana	11.67
81	West North Central		11.75
82	El Paso Electric Company	New Mexico	11.86
83	Northern States Power Company (MN)	South Dakota	12.02
84	Ameren Illinois Rate Zone III (formerly IP)	Illinois	12.05
85	Duke Energy Ohio	Ohio	12.13
86	Mississippi Power Company	Mississippi	12.20
87	Georgia Power Company	Georgia	12.20
88	Kansas City Power & Light Company	Missouri	12.27
89	Northern States Power Company (WI)	Michigan	12.35
90	Alabama Power Company	Alabama	12.37
91	Ohio Edison Company	Ohio	12.45
92	Dayton Power & Light Company	Ohio	12.55
93	Nevada Power Company - NV Energy	Nevada	12.56
94	Westar Energy-KGE	Kansas	12.56
95	Duke Energy Florida	Florida	12.58
96	Public Service Company of New Mexico	New Mexico	12.62
97	Black Hills Power, Inc. d/b/a Black Hills Energy	Wyoming	12.64
98	Northern Indiana Public Service Company	Indiana	12.64
99	Westar Energy-KPL	Kansas	12.64
100	Kansas City Power & Light Company	Kansas	12.74
101	Rochester Gas & Electric Corporation	New York	12.79
102	Commonwealth Edison Company	Illinois	12.83
103	Northern States Power Company (MN)	Minnesota	12.87
104	Potomac Electric Power Company	District of Columbia	12.90
105	Arizona Public Service Company	Arizona	12.93
106	US average	USA	12.99
107	WP&L	Wisconsin	13.09
108	Toledo Edison Company	Ohio	13.15
109	Northwestern Wisconsin Electric Company	Wisconsin	13.15
110	Cleveland Electric Illuminating Company	Ohio	13.23
111	Northern States Power Company (WI)	Wisconsin	13.26
112	National Grid (Niagara Mohawk Power Corporation)	New York	13.31
113	PECO Energy	Pennsylvania	13.38
114	Wisconsin Public Service Corporation	Wisconsin	13.47
115	PacifiCorp	California	13.53
116	AEP (Columbus Southern Power Rate Area)	Ohio	13.57
117	Gulf Power Company	Florida	13.58
118	Jersey Central Power & Light Company	New Jersey	13.61

Edison Electric Institute
Average Rates
(in cents/kilowatt hours)

Ranking of Total Residential Average Rates
12 Months Ending 6/30/2016

Ranking	Company	State	Avg Rate
119	Metropolitan Edison Company	Pennsylvania	13.63
120	Pennsylvania Power Company	Pennsylvania	13.83
121	AEP (Ohio Power Rate Area)	Ohio	13.90
122	Black Hills Power, Inc. d/b/a Black Hills Energy	South Dakota	13.95
123	Delmarva Power	Delaware	13.97
124	PPL Utilities Corp.	Pennsylvania	14.23
125	Potomac Electric Power Company	Maryland	14.30
126	Baltimore Gas & Electric Company	Maryland	14.35
127	Emera Maine - Maine Public District	Maine	14.52
128	Interstate Power & Light	Iowa	14.54
129	Pennsylvania Electric Company	Pennsylvania	14.72
130	South Carolina Electric & Gas Company	South Carolina	14.84
131	Delmarva Power	Maryland	14.86
132	Southern Indiana Gas & Electric Company	Indiana	14.96
133	Consumers Energy	Michigan	15.02
134	DTE Electric Company	Michigan	15.21
135	Florida Public Utilities Company	Florida	15.35
136	Duquesne Light Company	Pennsylvania	15.37
137	We Energies (formerly Wisconsin Electric)	Wisconsin	15.40
138	Cheyenne Light, Fuel & Power d/b/a Black Hills Energy	Wyoming	15.47
139	Rockland Electric Company	New Jersey	15.49
140	Black Hills/Colorado Electric	Colorado	15.63
141	We Energies (formerly Wisconsin Electric)	Michigan	15.93
142	Unitil Energy Systems, Inc.	New Hampshire	15.93
143	Pike County Light & Power Company	Pennsylvania	16.03
144	Southern California Edison	California	16.62
145	Central Hudson Gas & Electric Corporation	New York	16.67
146	Public Service Electric & Gas Company	New Jersey	16.71
147	Green Mountain Power	Vermont	16.97
148	Madison Gas & Electric Company	Wisconsin	17.09
149	Emera Maine - Bangor Hydro District	Maine	17.30
150	Public Service Company of New Hampshire d/b/a Eversource Energy	New Hampshire	17.78
151	Pacific Gas & Electric Company	California	17.94
152	Narragansett Electric Company	Rhode Island	18.05
153	Atlantic City Electric Company	New Jersey	18.14
154	Western Massachusetts Electric Company	Massachusetts	18.83
155	National Grid (Massachusetts Electric Company)	Massachusetts	19.12
156	Connecticut Light & Power Company	Connecticut	19.32
157	Orange & Rockland Utilities, Inc.	New York	20.01
158	Boston Edison Company	Massachusetts	20.13
159	Commonwealth Electric Company	Massachusetts	21.05
160	Cambridge Electric Company	Massachusetts	21.30
161	San Diego Gas & Electric Company	California	21.31
162	United Illuminating Company	Connecticut	22.76
163	Fitchburg Gas & Electric Light Company	Massachusetts	23.71
164	Consolidated Edison Company of New York	New York	25.22
165	Hawaiian Electric Company	Hawaii	26.39
166	Maui Electric Company (Maui)	Hawaii	29.05
167	Hawaii Electric Light Company	Hawaii	32.18
168	Maui Electric Company (Molokai)	Hawaii	33.99
169	Maui Electric Company (Lanai)	Hawaii	34.53

Edison Electric Institute
Average Rates
(in cents/kilowatt hours)

Ranking of Total Commercial Average Rates
12 Months Ending 06/30/2016

Ranking	Company	State	Avg Rate
1	OG&E Electric Services	Arkansas	6.72
2	Public Service Company of Oklahoma	Oklahoma	6.99
3	Southwestern Electric Power Company	Arkansas	7.16
4	MidAmerican Energy	South Dakota	7.24
5	OG&E Electric Services	Oklahoma	7.29
6	Southwestern Public Service	Texas	7.30
7	Entergy Texas	Texas	7.43
8	Idaho Power Company	Idaho	7.45
9	Entergy Louisiana, LLC (formerly Entergy Gulf States, Inc.)	Louisiana	7.50
10	Southwestern Electric Power Company	Texas	7.50
11	MidAmerican Energy	Iowa	7.54
12	Duke Energy Kentucky	Kentucky	7.59
13	MidAmerican Energy	Illinois	7.61
14	Southwestern Public Service	New Mexico	7.79
15	Dominion Virginia Power	Virginia	7.83
16	Montana-Dakota Utilities Company	Montana	7.84
17	Duke Energy Carolinas	North Carolina	7.84
18	AEP (Kingsport Power Rate Area)	Tennessee	8.08
19	Idaho Power Company	Oregon	8.08
20	Ameren Missouri	Missouri	8.10
21	PacifiCorp	Washington	8.27
22	Sierra Pacific Power Company - NV Energy	Nevada	8.42
23	Entergy New Orleans, Inc.	Louisiana	8.43
24	AEP (Indiana Michigan Power)	Indiana	8.44
25	PacifiCorp	Utah	8.45
26	Florida Power & Light Company	Florida	8.47
27	Entergy Mississippi, Inc.	Mississippi	8.49
28	Entergy Arkansas, Inc.	Arkansas	8.54
29	Duke Energy Carolinas	South Carolina	8.60
30	Ameren Illinois Rate Zone I (formerly CIPS)	Illinois	8.61
31	Avista Corp.	Idaho	8.62
32	Entergy Louisiana, Inc.	Louisiana	8.62
33	Southwestern Electric Power Company	Louisiana	8.62
34	Superior Water, Light & Power Company	Wisconsin	8.69
35	Ameren Illinois Rate Zone III (formerly IP)	Illinois	8.71
36	Duke Energy Progress, Inc.	South Carolina	8.75
37	Kansas City Power & Light - MPS	Missouri	8.76
38	PacifiCorp	Idaho	8.82
39	Duke Energy Progress, Inc.	North Carolina	8.86
40	Duke Energy Indiana	Indiana	8.87
41	AEP (Wheeling Power Rate Area)	West Virginia	8.90
42	Dominion North Carolina Power	North Carolina	8.92
43	AEP (Appalachian Power Rate Area)	Virginia	8.92
44	PacifiCorp	Wyoming	8.92
45	AEP (Appalachian Power Rate Area)	West Virginia	8.93
46	Potomac Edison Company	West Virginia	8.94
47	Monongahela Power Company	West Virginia	8.99
48	Otter Tail Power Company	North Dakota	8.99
49	Ameren Illinois Rate Zone II (formerly CILCO)	Illinois	9.01
50	Montana-Dakota Utilities Company	Wyoming	9.03
51	PacifiCorp	Oregon	9.05
52	Portland General Electric Company	Oregon	9.13
53	Public Service Company of Colorado	Colorado	9.13
54	Northwestern Energy	South Dakota	9.13
55	West North Central		9.16
56	Otter Tail Power Company	South Dakota	9.18
57	Kansas City Power & Light - L&P	Missouri	9.19
58	Old Dominion Power Company	Virginia	9.20
59	Nevada Power Company - NV Energy	Nevada	9.20

Edison Electric Institute
Average Rates
(in cents/kilowatt hours)

Ranking of Total Commercial Average Rates
12 Months Ending 06/30/2016

Ranking	Company	State	Avg Rate
60	Northern States Power Company (MN)	North Dakota	9.24
61	Minnesota Power Company	Minnesota	9.28
62	Duquesne Light Company	Pennsylvania	9.30
63	Georgia Power Company	Georgia	9.31
64	National Grid (Niagara Mohawk Power Corporation)	New York	9.34
65	Mississippi Power Company	Mississippi	9.36
66	Commonwealth Edison Company	Illinois	9.39
67	AEP (Indiana Michigan Power combined MI rate areas)	Michigan	9.42
68	Northern States Power Company (MN)	South Dakota	9.44
69	Duke Energy Florida	Florida	9.47
70	Delmarva Power	Maryland	9.47
71	Louisville Gas & Electric Company	Kentucky	9.53
72	Wisconsin Public Service Corporation	Wisconsin	9.53
73	Kansas City Power & Light Company	Missouri	9.54
74	Tampa Electric Company	Florida	9.54
75	West Penn Power Company	Pennsylvania	9.59
76	Northern States Power Company (MN)	Minnesota	9.62
77	Montana-Dakota Utilities Company	South Dakota	9.66
78	UGI Utilities, Inc.	Pennsylvania	9.71
79	Kentucky Utilities Company	Kentucky	9.74
80	Westar Energy-KGE	Kansas	9.75
81	Westar Energy-KPL	Kansas	9.77
82	Potomac Edison Company	Maryland	9.80
83	Puget Sound Energy	Washington	9.81
84	AEP (Columbus Southern Power Rate Area)	Ohio	9.82
85	Avista Corp.	Washington	9.82
86	DTE Electric Company	Michigan	9.85
87	Otter Tail Power Company	Minnesota	9.88
88	Northern States Power Company (WI)	Wisconsin	9.97
89	Kansas City Power & Light Company	Kansas	10.10
90	CLECO Power LLC	Louisiana	10.18
91	El Paso Electric Company	Texas	10.18
92	PPL Utilities Corp.	Pennsylvania	10.21
93	New York State Electric & Gas Corporation	New York	10.44
94	Interstate Power & Light	Iowa	10.53
95	Public Service Company of New Mexico	New Mexico	10.62
96	Duke Energy Ohio	Ohio	10.69
97	Montana-Dakota Utilities Company	North Dakota	10.71
98	US average	USA	10.74
99	Indianapolis Power & Light Company	Indiana	10.76
100	Gulf Power Company	Florida	10.78
101	Unisource Electric Company	Arizona	10.80
102	Black Hills Power, Inc. d/b/a Black Hills Energy	Montana	10.93
103	Metropolitan Edison Company	Pennsylvania	10.95
104	Pennsylvania Power Company	Pennsylvania	10.97
105	Dayton Power & Light Company	Ohio	11.04
106	Pennsylvania Electric Company	Pennsylvania	11.06
107	WP&L	Wisconsin	11.09
108	Wisconsin Public Service Corporation	Michigan	11.10
109	AEP (Ohio Power Rate Area)	Ohio	11.11
110	Arizona Public Service Company	Arizona	11.14
111	Delmarva Power	Delaware	11.18
112	Alabama Power Company	Alabama	11.20
113	Northern States Power Company (WI)	Michigan	11.22
114	Baltimore Gas & Electric Company	Maryland	11.22
115	Northern Indiana Public Service Company	Indiana	11.34
116	El Paso Electric Company	New Mexico	11.41
117	AEP (Kentucky Power Rate Area)	Kentucky	11.53
118	South Carolina Electric & Gas Company	South Carolina	11.54

Edison Electric Institute
Average Rates
(in cents/kilowatt hours)

Ranking of Total Commercial Average Rates
12 Months Ending 06/30/2016

Ranking	Company	State	Avg Rate
119	PECO Energy	Pennsylvania	11.58
120	NorthWestern Energy (formerly Montana Power)	Montana	11.68
121	We Energies (formerly Wisconsin Electric)	Wisconsin	11.70
122	Southern Indiana Gas & Electric Company	Indiana	11.92
123	Rochester Gas & Electric Corporation	New York	11.93
124	Madison Gas & Electric Company	Wisconsin	11.95
125	Jersey Central Power & Light Company	New Jersey	12.06
126	Pike County Light & Power Company	Pennsylvania	12.14
127	Cheyenne Light, Fuel & Power d/b/a Black Hills Energy	Wyoming	12.25
128	Consumers Energy	Michigan	12.32
129	Black Hills Power, Inc. d/b/a Black Hills Energy	South Dakota	12.47
130	Tucson Electric Power Company	Arizona	12.52
131	Black Hills/Colorado Electric	Colorado	12.54
132	Potomac Electric Power Company	District of Columbia	12.79
133	Potomac Electric Power Company	Maryland	12.82
134	Emera Maine - Maine Public District	Maine	12.83
135	Black Hills Power, Inc. d/b/a Black Hills Energy	Wyoming	12.91
136	Central Hudson Gas & Electric Corporation	New York	12.93
137	Toledo Edison Company	Ohio	13.21
138	Northwestern Wisconsin Electric Company	Wisconsin	13.41
139	Florida Public Utilities Company	Florida	13.42
140	Rockland Electric Company	New Jersey	13.51
141	Public Service Electric & Gas Company	New Jersey	13.54
142	Ohio Edison Company	Ohio	13.56
143	Green Mountain Power	Vermont	14.25
144	National Grid (Massachusetts Electric Company)	Massachusetts	14.27
145	We Energies (formerly Wisconsin Electric)	Michigan	14.38
146	Southern California Edison	California	14.92
147	Cambridge Electric Company	Massachusetts	15.01
148	Orange & Rockland Utilities, Inc.	New York	15.10
149	PacifiCorp	California	15.14
150	Public Service Company of New Hampshire d/b/a Eversource Energy	New Hampshire	15.15
151	Unitil Energy Systems, Inc.	New Hampshire	15.33
152	Narragansett Electric Company	Rhode Island	15.45
153	Emera Maine - Bangor Hydro District	Maine	15.69
154	Commonwealth Electric Company	Massachusetts	15.91
155	Cleveland Electric Illuminating Company	Ohio	16.01
156	Connecticut Light & Power Company	Connecticut	16.11
157	Western Massachusetts Electric Company	Massachusetts	16.22
158	United Illuminating Company	Connecticut	16.49
159	Pacific Gas & Electric Company	California	16.93
160	Boston Edison Company	Massachusetts	17.47
161	Atlantic City Electric Company	New Jersey	18.03
162	Fitchburg Gas & Electric Light Company	Massachusetts	18.54
163	Consolidated Edison Company of New York	New York	19.49
164	San Diego Gas & Electric Company	California	21.20
165	Hawaiian Electric Company	Hawaii	23.17
166	Maui Electric Company (Maui)	Hawaii	29.04
167	Hawaii Electric Light Company	Hawaii	30.20
168	Maui Electric Company (Molokai)	Hawaii	35.35
169	Maui Electric Company (Lanai)	Hawaii	37.46

Edison Electric Institute
Average Rates
(in cents/kilowatt hours)

Ranking of Total Industrial Average Rates
12 Months Ending 6/30/2016

Ranking	Company	State	Avg Rate
1	Southwestern Public Service	Texas	4.26
2	Public Service Company of Oklahoma	Oklahoma	4.41
3	Delmarva Power	Delaware	4.64
4	Entergy Louisiana, LLC (formerly Entergy Gulf States, Inc.)	Louisiana	4.72
5	Entergy Louisiana, Inc.	Louisiana	4.74
6	Pennsylvania Power Company	Pennsylvania	4.76
7	MidAmerican Energy	South Dakota	4.77
8	MidAmerican Energy	Iowa	4.86
9	OG&E Electric Services	Oklahoma	4.90
10	National Grid (Niagara Mohawk Power Corporation)	New York	4.93
11	Toledo Edison Company	Ohio	4.95
12	Southwestern Public Service	New Mexico	5.00
13	Entergy Texas	Texas	5.03
14	Georgia Power Company	Georgia	5.17
15	OG&E Electric Services	Arkansas	5.19
16	Sierra Pacific Power Company - NV Energy	Nevada	5.43
17	Public Service Company of New Mexico	New Mexico	5.52
18	Duke Energy Progress, Inc.	South Carolina	5.54
19	MidAmerican Energy	Illinois	5.55
20	AEP (Kingsport Power Rate Area)	Tennessee	5.55
21	Commonwealth Edison Company	Illinois	5.56
22	Idaho Power Company	Idaho	5.58
23	Southwestern Electric Power Company	Arkansas	5.61
24	Duke Energy Carolinas	South Carolina	5.65
25	Dominion North Carolina Power	North Carolina	5.73
26	AEP (Wheeling Power Rate Area)	West Virginia	5.75
27	Ameren Missouri	Missouri	5.80
28	We Energies (formerly Wisconsin Electric)	Michigan	5.85
29	Montana-Dakota Utilities Company	Montana	5.87
30	Mississippi Power Company	Mississippi	5.91
31	Avista Corp.	Idaho	5.93
32	Southwestern Electric Power Company	Texas	5.93
33	Idaho Power Company	Oregon	6.01
34	PacifiCorp	Utah	6.08
35	Alabama Power Company	Alabama	6.09
36	Dominion Virginia Power	Virginia	6.11
37	Duke Energy Carolinas	North Carolina	6.15
38	Wisconsin Public Service Corporation	Michigan	6.16
39	Entergy Mississippi, Inc.	Mississippi	6.17
40	Wisconsin Public Service Corporation	Wisconsin	6.18
41	Kentucky Utilities Company	Kentucky	6.20
42	Delmarva Power	Maryland	6.20
43	New York State Electric & Gas Corporation	New York	6.21
44	AEP (Indiana Michigan Power)	Indiana	6.21
45	West Penn Power Company	Pennsylvania	6.32
46	PPL Utilities Corp.	Pennsylvania	6.34
47	Monongahela Power Company	West Virginia	6.37
48	Portland General Electric Company	Oregon	6.37
49	Northwestern Energy	South Dakota	6.39
50	Kansas City Power & Light - MPS	Missouri	6.40
51	Florida Power & Light Company	Florida	6.41
52	DTE Electric Company	Michigan	6.44
53	Black Hills Power, Inc. d/b/a Black Hills Energy	Montana	6.49
54	AEP (Kentucky Power Rate Area)	Kentucky	6.50
55	Duke Energy Kentucky	Kentucky	6.52
56	Duke Energy Progress, Inc.	North Carolina	6.52
57	AEP (Appalachian Power Rate Area)	West Virginia	6.53
58	West North Central		6.53
59	PacifiCorp	Wyoming	6.57

Edison Electric Institute
Average Rates
(in cents/kilowatt hours)

Ranking of Total Industrial Average Rates
12 Months Ending 6/30/2016

Ranking	Company	State	Avg Rate
60	Avista Corp.	Washington	6.57
61	Superior Water, Light & Power Company	Wisconsin	6.63
62	Potomac Edison Company	West Virginia	6.64
63	Otter Tail Power Company	South Dakota	6.68
64	Montana-Dakota Utilities Company	Wyoming	6.73
65	Duke Energy Indiana	Indiana	6.74
66	Northern Indiana Public Service Company	Indiana	6.75
67	Southwestern Electric Power Company	Louisiana	6.76
68	Louisville Gas & Electric Company	Kentucky	6.77
69	Interstate Power & Light	Iowa	6.77
70	Otter Tail Power Company	Minnesota	6.77
71	Minnesota Power Company	Minnesota	6.82
72	Entergy Arkansas, Inc.	Arkansas	6.82
73	Northern States Power Company (WI)	Michigan	6.83
74	AEP (Appalachian Power Rate Area)	Virginia	6.83
75	Entergy New Orleans, Inc.	Louisiana	6.90
76	US average	USA	6.92
77	Kansas City Power & Light - L&P	Missouri	6.93
78	PacifiCorp	Washington	7.04
79	PECO Energy	Pennsylvania	7.04
80	Kansas City Power & Light Company	Missouri	7.09
81	Cheyenne Light, Fuel & Power d/b/a Black Hills Energy	Wyoming	7.10
82	Southern Indiana Gas & Electric Company	Indiana	7.13
83	Orange & Rockland Utilities, Inc.	New York	7.16
84	Westar Energy-KGE	Kansas	7.16
85	Duquesne Light Company	Pennsylvania	7.22
86	South Carolina Electric & Gas Company	South Carolina	7.22
87	Otter Tail Power Company	North Dakota	7.29
88	PacifiCorp	Idaho	7.30
89	CLECO Power LLC	Louisiana	7.44
90	Northern States Power Company (MN)	North Dakota	7.48
91	PacifiCorp	Oregon	7.55
92	Ohio Edison Company	Ohio	7.57
93	Northern States Power Company (MN)	Minnesota	7.58
94	AEP (Ohio Power Rate Area)	Ohio	7.59
95	Northern States Power Company (WI)	Wisconsin	7.60
96	Nevada Power Company - NV Energy	Nevada	7.69
97	UGI Utilities, Inc.	Pennsylvania	7.70
98	Cleveland Electric Illuminating Company	Ohio	7.72
99	AEP (Columbus Southern Power Rate Area)	Ohio	7.74
100	Northern States Power Company (MN)	South Dakota	7.78
101	Potomac Edison Company	Maryland	7.79
102	AEP (Indiana Michigan Power combined MI rate areas)	Michigan	7.82
103	WP&L	Wisconsin	7.84
104	Pennsylvania Electric Company	Pennsylvania	7.87
105	El Paso Electric Company	Texas	7.96
106	Black Hills Power, Inc. d/b/a Black Hills Energy	South Dakota	7.99
107	Madison Gas & Electric Company	Wisconsin	8.05
108	Westar Energy-KPL	Kansas	8.07
109	Indianapolis Power & Light Company	Indiana	8.07
110	Montana-Dakota Utilities Company	South Dakota	8.10
111	Montana-Dakota Utilities Company	North Dakota	8.15
112	Duke Energy Florida	Florida	8.20
113	Arizona Public Service Company	Arizona	8.25
114	We Energies (formerly Wisconsin Electric)	Wisconsin	8.33
115	Gulf Power Company	Florida	8.36
116	Unisource Electric Company	Arizona	8.41
117	NorthWestern Energy (formerly Montana Power)	Montana	8.48
118	Tampa Electric Company	Florida	8.50

Edison Electric Institute
Average Rates
(in cents/kilowatt hours)

Ranking of Total Industrial Average Rates
12 Months Ending 6/30/2016

Ranking	Company	State	Avg Rate
119	Consumers Energy	Michigan	8.51
120	Metropolitan Edison Company	Pennsylvania	8.56
121	Black Hills Power, Inc. d/b/a Black Hills Energy	Wyoming	8.60
122	Tucson Electric Power Company	Arizona	8.62
123	El Paso Electric Company	New Mexico	8.71
124	Black Hills/Colorado Electric	Colorado	8.81
125	Old Dominion Power Company	Virginia	8.90
126	Dayton Power & Light Company	Ohio	9.00
127	Northwestern Wisconsin Electric Company	Wisconsin	9.21
128	Puget Sound Energy	Washington	9.24
129	Unitil Energy Systems, Inc.	New Hampshire	9.31
130	Kansas City Power & Light Company	Kansas	9.45
131	Jersey Central Power & Light Company	New Jersey	9.65
132	Rochester Gas & Electric Corporation	New York	9.66
133	Green Mountain Power	Vermont	9.80
134	Central Hudson Gas & Electric Corporation	New York	9.85
135	Pacific Gas & Electric Company	California	9.97
136	Emera Maine - Maine Public District	Maine	10.04
137	Emera Maine - Bangor Hydro District	Maine	10.25
138	Duke Energy Ohio	Ohio	10.47
139	Fitchburg Gas & Electric Light Company	Massachusetts	10.87
140	Public Service Electric & Gas Company	New Jersey	10.92
141	Southern California Edison	California	10.99
142	Baltimore Gas & Electric Company	Maryland	11.22
143	Cambridge Electric Company	Massachusetts	12.81
144	Western Massachusetts Electric Company	Massachusetts	13.27
145	Rockland Electric Company	New Jersey	13.43
146	Public Service Company of New Hampshire d/b/a Eversource Energy	New Hampshire	13.62
147	Commonwealth Electric Company	Massachusetts	13.68
148	Connecticut Light & Power Company	Connecticut	13.94
149	PacifiCorp	California	13.98
150	Florida Public Utilities Company	Florida	14.61
151	Public Service Company of Colorado	Colorado	14.71
152	United Illuminating Company	Connecticut	14.92
153	Narragansett Electric Company	Rhode Island	15.12
154	National Grid (Massachusetts Electric Company)	Massachusetts	15.13
155	Boston Edison Company	Massachusetts	15.33
156	San Diego Gas & Electric Company	California	16.34
157	Consolidated Edison Company of New York	New York	16.84
158	Hawaiian Electric Company	Hawaii	19.87
159	Atlantic City Electric Company	New Jersey	23.99
160	Hawaii Electric Light Company	Hawaii	25.07
161	Maui Electric Company (Maui)	Hawaii	25.44
162	Maui Electric Company (Molokai)	Hawaii	26.21
163	Maui Electric Company (Lanai)	Hawaii	32.94
164	Ameren Illinois Rate Zone III (formerly IP)	Illinois	
165	Ameren Illinois Rate Zone II (formerly CILCO)	Illinois	
166	Ameren Illinois Rate Zone I (formerly CIPS)	Illinois	
167	Potomac Electric Power Company	District of Columbia	
168	Pike County Light & Power Company	Pennsylvania	
169	Potomac Electric Power Company	Maryland	