

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

In the Matter of the Application of Kansas)
City Power & Light Company for) Docket No. 18-KCPE-063-TAR
Approval of Changes to its Estimated Bill)
Procedures)

CURB'S RESPONSE TO STAFF'S REPORT AND RECOMMENDATION

COMES NOW, The Citizens' Utility Ratepayer Board (CURB) and submits its response to the Report and Recommendation filed by the Staff of the Kansas Corporation Commission (Staff and Commission respectively) in the above-captioned docket on December 13, 2017.

I. Background

1. On August 4, 2017, Kansas City Power & Light Company (KCP&L) filed its Application requesting approval of changes to its estimated bill procedures.¹ KCP&L seeks changes to its estimated bill procedures as a result of changing to a new billing system.²

2. On August 14, 2017, CURB filed its Petition to Intervene.³ CURB explained that KCP&L's proposed changes to its estimated bill procedures may substantially affect the rates paid and services received by residential and small commercial ratepayers.⁴

3. On August 24, 2017, the Commission issued an Order granting CURB's Petition to Intervene.⁵

¹ See Application of Kansas City Power & Light Company for Approval of Changes to its Estimated Bill Procedures and Approval of its Estimated Bill Procedure Tariff (August 4, 2017) (Application).

² KCP&L is in the process of changing its current billing system, CIS Plus, to its new billing system, Oracle Utilities Customer Care and Billing information system (CCB). Application, p. 1.

³ CURB's Petition to Intervene (August 14, 2017).

⁴ *Id.* at ¶ 5.

⁵ Order Granting CURB's Petition to Intervene (August 24, 2017).

4. On December 13, 2017, Staff filed its Report and Recommendation (“Staff’s R&R” or “R&R”).⁶ Staff recommends the Commission approve KCP&L’s Application. More specifically, Staff recommends approval “because the new estimation procedures does not violate the Commission’s Electric, Natural Gas, and Water Billing Standards (Billing Standards); in performance tests by both KCP&L and the Commission Staff it performs better than the previous procedure, and acceptance of the new procedure will prevent the need for an expensive customization in the CCB.”⁷ Staff determined in its analysis that the only subsection of the Billing Standards relevant to KCP&L’s request is Subsection I.C.(1). Under Subsection I.C.(1), a utility is required to get Commission approval before it can employ any substantial changes to its estimated bill procedures.⁸ Staff concluded that the Billing Standards do not require any particular methodology, only that the estimated bill procedures be approved by the Commission.⁹

II. CURB’s Response

5. CURB analyzed this Application from the perspective of residential and small commercial ratepayers. Under I.C.(1) of the Billing Standards, “[t]he utility may render a bill based on estimated meter reading only if the estimating procedures employed by the utility and any substantial changes in those procedures have been approved by the Commission and the bill is rendered”¹⁰ CURB analyzed the Billing Standards and agrees that a utility is not required to follow a particular methodology, only that the Commission approve the estimated bill procedures pursuant to certain conditions that are required under I.C.(1) thru (6).

⁶ Notice of Filing of Staff’s Report and Recommendation (December 13, 2017).

⁷ Notice of Filing of Staff’s Report and Recommendation, Attachment – Staff’s R&R, p. 1.

⁸ *Id.*

⁹ *Id.*

¹⁰ Commission Billing Standards, I.C.(1).

6. Given that the utility has the right to make substantial changes to its estimated bill procedures pursuant to Commission approval, CURB next analyzed KCP&L's proposal and Staff's recommendations. Staff's recommendations are: "1) The proposed estimated bill procedures do not violate the Commission's Billing Standards; 2) The proposed estimated bill procedures are more accurate than the current estimation procedures; and 3) If the proposed estimated procedures are approved, the Company will not incur the upfront and maintenance costs that would otherwise be necessary to continue the current bill estimation procedures under the new billing system."¹¹

7. After a careful analysis, CURB determined that Staff's recommendations, in its R&R, are reasonable and therefore in the best interests of Kansas residential and small commercial ratepayers. CURB supports KCP&L's proposed changes to its estimated bill procedures because the new estimating procedures will likely be more accurate, thus potentially benefiting residential and small commercial ratepayers in the way of monetary savings. Next, if the proposed estimated bill procedures are approved it will result in direct savings for Kansas residential and small commercial ratepayers since KCP&L will not incur upfront and maintenance costs necessary to continue their current billing system. These recommendations will result in a direct benefit for Kansas residential and small commercial ratepayers which CURB fully supports.

WHEREFORE, CURB respectfully recommends that the Commission adopt Staff's Report and Recommendation and for such other relief as the Commission deems just and proper.

¹¹ Staff's R&R, p. 3.

Respectfully submitted,



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VERIFICATION

STATE OF KANSAS

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SS:

COUNTY OF SHAWNEE

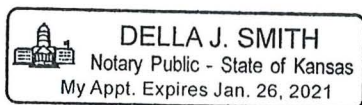
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I, Thomas J. Connors, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.

Norman J. L.

Thomas J. Connors

SUBSCRIBED AND SWORN to before me this 15th day of December, 2017.




Notary Public

My Commission expires: 01-26-2021.

CERTIFICATE OF SERVICE

18-KCPE-063-TAR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 15th day of December, 2017, to the following:

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