

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

DIRECT TESTIMONY ON REMAND OF

BRADLEY D. LUTZ

**ON BEHALF OF
EVERGY KANSAS CENTRAL, INC. AND EVERGY KANSAS SOUTH, INC.**

**IN THE MATTER OF THE JOINT APPLICATION OF
EVERGY KANSAS CENTRAL, INC. AND EVERGY KANSAS SOUTH, INC.
TO MAKE CERTAIN CHANGES
IN THEIR CHARGES FOR ELECTRIC SERVICE**

DOCKET NO. 18-WSEE-328-RTS

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1 **Q: Please state your name and business address.**

2 A: My name is Bradley D. Lutz. My business address is 1200 Main, Kansas City, Missouri
3 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Evergy Metro, Inc. and serve as Director – Regulatory Affairs for Evergy
6 Metro, Inc. d/b/a Evergy Kansas Metro (“Evergy Kansas Metro”), Evergy Kansas Central,
7 Inc. [f/k/a/ Westar Energy, Inc.], Evergy Kansas South, Inc. [f/k/a Kansas Gas and Electric
8 Company] (collectively referred to herein as “Evergy Kansas Central”) and Evergy
9 Missouri West, Inc. and Evergy Metro, Inc. d/b/a Evergy Missouri Metro.

10 **Q: On whose behalf are you testifying?**

11 A: I am testifying on behalf of Evergy Kansas Central referred to as “Kansas Central” or the
12 “Company”.¹

¹ Effective October 8, 2019, Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. d/b/a collectively as Evergy Kansas Central adopted the service territory and tariffs of Westar; *Order Approving Name Change*, Docket No. 20-WSEE-123-CCN, dated October 8, 2019. Effective October 8, 2019, Evergy Metro, Inc. d/b/a Evergy Kansas Metro

1 **Q: What are your responsibilities?**

2 A: My current responsibilities are focused on regulatory operations and customer issues,
3 providing support and oversight for a wide range of regulatory work including
4 determination of retail revenues, load research, rate design, class cost of service, tariff
5 administration, compliance reporting, response to customer complaints, docket
6 management system administration, testimony preparation, general tariff interpretation and
7 application, and relationship development for the Company's regulatory activities in the
8 Missouri and Kansas jurisdictions.

9 **Q: Please describe your education, experience and employment history.**

10 A: I hold a Master of Business Administration from Northwest Missouri State University and
11 a Bachelor of Science in Engineering Technology from Missouri Western State University.
12 I joined Kansas City Power & Light Company in August 2002 as an Auditor in the Audit
13 Services Department. I moved to the Regulatory Affairs group in September 2005 as a
14 Regulatory Analyst where my primary responsibilities included support of our rate design
15 and class cost of service efforts. I was promoted to Manager in November 2010 and was
16 promoted to my current position in March 2020.

17 Prior to joining Kansas City Power & Light Company, I was employed by the St.
18 Joseph Frontier Casino for two years as Information Technology Manager. Prior to St.
19 Joseph Frontier Casino, I was employed by St. Joseph Light and Power Company for nearly
20 14 years. I held various technical positions at St. Joseph Light and Power Company,
21 including Engineering Technician-Distribution, Automated Mapping/Facilities

adopted the service territory and tariffs of KCP&L; *Order Approving Name Change*, Docket No. 20-KCPE-122-CCN, dated October 8, 2019.

1 Management Coordinator, and my final position as Senior Client Support Specialist-
2 Information Technology.

3 **Q: Have you previously testified in a proceeding before the Kansas Corporation**
4 **Commission (“Commission” or “KCC”) or before any other utility regulatory**
5 **agency?**

6 A: Yes, I have provided written testimony in Docket Nos. 07-KCPE-905-RTS, 09-KCPE-
7 246-RTS, 12-KCPE-764-RTS, 14-KCPE-272-RTS, and 15-KCPE-116-RTS supporting
8 the Company’s CCOS studies or rate design proposals. I have testified before the
9 Commission as part of the General Investigation to Examine Issues Surrounding Rate
10 Design for Distributed Generation Customers, Docket No. 16-GIME-403-GIE. Recently,
11 I provided written testimony and responded to cross examination in Docket No 18-KCPE-
12 480-RTS, supporting the Company rate designs, renewable energy riders and lighting
13 programs. Additionally, I have testified multiple times before the Missouri Public Service
14 Commission concerning class cost of service and rate design issues as part of recent rate
15 proceedings.

16 **Q: What is the purpose of your testimony?**

17 A: My testimony will provide support for the Company’s proposed rate design offered in
18 compliance with the Commission Order Setting Procedural Schedule on Rate Design in
19 Docket No. 18-WSEE-328-RTS, ordered on June 16, 2020, applicable to Kansas Central
20 residential customers. The proposed rate design herein considered the remand by the
21 Kansas Supreme Court on this matter and seeks to reconcile the guidance offered in that
22 proceeding. This rate design represents an ongoing effort by Evergy Kansas Central to
23 implement a rate that appropriately addresses the operational and ratemaking conditions

1 resulting from customer generation through Distributed Generation (“DG”), commonly in
2 the form of rooftop solar photovoltaics.

3 **Q: Does the Company offer any other witnesses to support this rate design?**

4 A: Yes. The Company also offers testimony from Dr. Ahmad Faruqui, Principal with The
5 Brattle Group. Dr. Faruqui will summarize the alternative rate design options noted by
6 the Kansas Supreme Court for DG customers as well as other DG rate design options
7 observed in use by other utilities in other jurisdictions in the United States. Dr. Faruqui
8 will identify factors that compel a distinct rate design approach for DG customers and
9 examine how the Company’s proposed designs address those factors.

10 **PROCEDURAL BACKGROUND**

11 **Q: You mention this testimony represents a continuation of a longer process of**
12 **establishing a rate for DG customers. Please describe the key milestones from that**
13 **process.**

14 A: The full timeline of this issue has been addressed in significant portions throughout the
15 various dockets so only the portions relevant to establish the context for this rate design
16 proposal are mentioned.

17 • In Westar’s general rate case, Docket No. 15-WSEE-115-RTS the parties reached
18 agreement – later approved by the Commission – that the issue of whether a
19 separate Residential Standard Distributed Generation Tariff is necessary, and, if so,
20 how to structure the Residential Standard Distributed Generation Tariff in order to
21 properly recover just and reasonable costs from customers with distributed
22 generation should be deferred to a generic docket.

- 1 • On July 12, 2016, the Commission opened Docket 16-GIME-403-GIE to address
2 the previously mentioned agreement and to provide a discussion of the appropriate
3 rate structure for DG including the quantifiable costs and benefits of DG. The
4 Docket was resolved through a Non-Unanimous Stipulation and Agreement that
5 was ultimately approved by the Commission. In the Final Order to this Docket the
6 Commission found that the Kansas Central Distributed Generation Residential Rate
7 Schedule deployed in the 2015 rate case should remain in place and those customers
8 remain in a separate rate class. The Commission also found the current two-part
9 residential rate design is problematic because DG customers use the electric grid as
10 a backup system resulting in their consuming less energy than non-DG customers,
11 which results in DG customers not paying the same proportion of fixed costs as
12 non-DG customers, thus DG customers are being subsidized by non-DG customers.
13 Additionally, the Commission identified three rate design options as examples of
14 rates appropriate for residential private DG customers to allow utilities to better
15 recover the costs of providing service to that class or sub-class of customers:
- 16 ○ A cost of service based three-part rate consisting of a customer charge,
17 demand charge, and energy charge;
 - 18 ○ A grid charge based upon either the DG output or nameplate rating; or
 - 19 ○ A cost of service-based customer charge that is tiered based upon a
20 customer's capacity requirements.
- 21 • On February 1, 2018, Westar Energy, Inc. and Kansas Gas and Electric Company
22 (a/k/a Westar, Evergy Kansas Central's predecessor in interest) filed a Joint
23 Application for a rate increase. Docket No. 18-WSEE-328-RTS resulted in a Non-

1 Unanimous Stipulation and Agreement. In relevant part, the Parties to the
2 Stipulation and Agreement agreed that Westar would implement a three-part rate
3 for the residential DG class with a demand charge of \$9.00/kW for the summer and
4 of \$3.00/kW for the winter. On September 27, 2018, the Commission issued its
5 Order Approving Non- Unanimous Stipulation and Agreement, finding in relevant
6 part, that:

- 7 ○ the expert witnesses from Westar, Staff and CURB provides substantial,
8 competent and compelling evidence to approve the Stipulation and
9 Agreement 's three-part rate design;
 - 10 ○ the evidence demonstrates that the residential DG customers' usage patterns,
11 rather than their use of renewable energy is the basis for paying a different
12 rate than their non-DG counterparts; and
 - 13 ○ residential DG customers are not disadvantaged by any alleged difficulty in
14 understanding or responding to the three-part residential DG rate.
- 15 ● On December 10, 2018, the Sierra Club and Vote Solar filed their Notice of Appeal.
16 Pursuant to K.S.A. 66-118a(b), the Court of Appeals had exclusive jurisdiction over
17 the appeal. On April 12, 2019, the Court of Appeals issued an unpublished
18 Memorandum Opinion, affirming the Commission's Order. On May 10, 2019, the
19 Sierra Club and Vote Solar filed a Petition for Review with the Supreme Court. On
20 September 3, 2019, the Supreme Court granted the Petition for Review. The
21 Supreme Court heard oral argument on the Petition for Review on December 19,
22 2019. On April 3, 2020, the Supreme Court reversed and remanded the Court of
23 Appeals' decision.

- 1 • As directed by the Supreme Court, the Commission reopened Docket No. 18-
2 WSEE-328-RTS for further proceedings to determine an appropriate rate design for
3 residential DG customers of Evergy Kansas Central. The Parties were instructed
4 to file comments addressing the two options for rate design suggested by the
5 Supreme Court and to propose other alternative rate designs consistent with K.S.A.
6 66-117d.

7 **PROPOSED RATE DESIGN**

8 **Q: What is the Company rate proposal for this filing?**

9 A: The Company proposes a monthly residential grid access fee of \$3.00 per kW of installed
10 DG capacity, applicable to all residential customers (Exemplar tariffs offered in Schedule
11 BDL-1). This is the Company's primary recommendation; we also make an alternative
12 recommendation which I will address later in this testimony.

13 **Q: Please describe the grid access charge and its design.**

14 A: The monthly grid access charge would be computed based on the size of a customer's
15 installed DG capacity. The capacity in kW (DC) would be multiplied by the \$ per kW grid
16 access fee to define the applicable monthly grid access charge. The grid access charge
17 would therefore vary across RS-DG customers based on the kW of installed DG capacity.
18 Customers with higher DG capacity would pay more per month than customers with
19 smaller DG capacity, thereby promoting equity within customers having generation.
20 Customers without installed generation have an installed DG capacity of zero, resulting in
21 a monthly grid access charge of zero.

22 **Q: Does this rate design comply with the guidance provided by the Supreme Court**
23 **remand?**

1 A: Yes, from my perspective as a practitioner and expert in matters of electric rate design and
2 not from a legal perspective as I am not a lawyer. The Kansas Supreme Court recognized
3 that a subsidy currently exists in favor of residential customers with distributed generation,
4 calling the problem the “economic free rider problem” and found that “K.S.A. 66-117d is
5 an antidiscrimination provision that prohibits utilities from charging DG customers a
6 higher price than non-DG customers for the same service.”² A grid access charge addresses
7 both concerns. Because residential DG and residential non-DG customers exhibit different
8 consumption characteristics and because residential DG customers use the utility’s system
9 differently from other residential customers by both exporting and importing power to and
10 from the grid, DG customers are provided a different service than non-DG customers and
11 using a different rate design for residential DG customers is therefore not discriminatory.
12 Application of the grid access charge, using the installed capacity as the basis, also helps
13 in some degree to mitigate the subsidy concern.

14 **Q: Will the grid access charge resolve the subsidy issues resulting from DG?**

15 A: No. To resolve the subsidy concern through the grid access charge would require the fee
16 be set at \$6.50 per kW of installed DG capacity. The Company, seeking to limit customer
17 impacts and support a gradual change in the rate design methodology, set the grid access
18 charge at approximately 50% of that amount. The Company believes it is important to
19 make a step toward mitigating the concern, establishing an equitable approach and
20 improving upon the subsidy levels associated with the existing rate designs applied to DG
21 customers. Dr. Faruqui details this subsidy in his testimony.

22 **Q: If approved, how would the Company propose to deploy the grid access charge?**

² *In the Matter of the Joint Application of Westar Energy, Inc. and Kansas Gas and Electric Company*, 460 P.3d 821, 827 (Kan. 2020).

1 A: The grid access fee would be applied to each of the Company residential rate tariffs. The
2 Company would then verify an appropriate kW capacity as part of the customer record and
3 make it available for monthly billing on accounts where DG is installed. Additionally, the
4 Company will provide educational information regarding the grid access charge for
5 customers to understand the charge and impact on bills. Information would be provided
6 with customer bills as well as on the website. For customers who don't receive a paper bill,
7 email is an effective way to reach customers with information about the charge. Internal
8 customer service representatives would also be trained on the charge, so that they may
9 assist customers who inquire.

10 Additionally, contingent on approval, the Company would no longer offer service
11 under the grandfathered DG rates or the three-part residential DG demand rate and move
12 all remaining customers served under those rates to the Residential Standard DG rate
13 (Schedule RS-DG) to ensure that all similarly situated customers would receive the same
14 rate treatment. This step would consolidate all residential customers with DG under a
15 common rate, similar to the rate in existence prior to the introduction of three-part demand
16 rate.

17 Finally, if approved, the grid access charge would produce changes in revenues not
18 contemplated in the Company's last general rate proceeding. Evergy Kansas Central
19 proposes that the changes in revenues produced by the grid access charge be placed in a
20 deferral account and fully considered in the Company's next general rate proceeding.
21 Based on the 2019 Net Metering Compliance report filed with Commission in February of
22 this year, pursuant to K.A.R. 82-17-4, applying the proposed grid access charge to
23 residential customers with private generation would yield an estimate of \$205,491.60 of

1 revenue not accounted for in the 2018 rate designs. This would not be the net effect of the
2 proposed grid access charge as there are some revenues being produced by the current
3 three-part demand rate that would affect this amount. Precise determination of the revenue
4 effect is problematic due to a number of customers who were included as part of the proof
5 of revenue for the three-part demand residential rate within the 2018 rate designs but were
6 subsequently moved to the Residential Standard rate in October of 2019 following
7 negotiations with the Climate+Energy Project concerning potential legislation in Kansas.

8 **Q: What is the expected customer impact of the grid access charge?**

9 A: At the time of the Company's last rate proceeding, Kansas Central has 611,452 customers
10 receiving residential service. Again, based on the 2019 Net Metering Compliance report
11 filed with Commission in February of this year, 833 residential customers have DG systems
12 installed. If calculated as proposed, the average monthly charge resulting from the grid
13 access fee would be \$20.56 per month or \$246.69 per year. Using the smallest residential
14 system DG capacity on record, the minimum amount of the grid access charge applied
15 would be \$0.57 per month or \$6.84 per year. Using the largest residential system DG
16 capacity on record, the maximum amount of the grid access charge applied would be
17 \$176.40 per month or \$2,116.80 per year. It is projected that of about 193 residential
18 customers with DG installed, less than 25% of the total number of residential customers
19 with DG would experience a charge greater than or equal to the average. Again, if
20 calculated as proposed, the grid access charge would produce \$205,491.60 of revenue for
21 the Company that would have not been collected and ultimately paid for by other
22 residential non-DG customers.

1 **ALTERNATE RATE DESIGN**

2 **Q: Did the Company consider any other rate designs?**

3 A: Yes. The Company considered other designs and spoke to each in its Initial Comments
4 offered in this docket on August 14th. Each have positive and negative attributes impacting
5 the rate design's ability to address the goals of this proceeding.

6 **Q: Does the Company have an Alternate Rate Design to offer?**

7 A: Yes. The Company proposes, that if the grid access charge is found unsuitable by the
8 Commission, a rate design deploying a minimum bill for all residential customers be
9 approved (Exemplar tariffs offered in Schedule BDL-2).

10 **Q: Please describe the rate and its design.**

11 A: As its name describes, this rate design would apply a minimum bill amount of \$35 to all
12 residential customers' monthly bills. The Company established this minimum by
13 examining the record and analysis performed by Dr. Faruqui to support Company
14 Comments in Docket 16-GIME-403-GIE. In that proceeding Dr. Faruqui determined
15 Kansas Central, then Westar, incurred a cost of approximately \$77 per month to serve
16 customers.³ With the initial application of this new rate design, the Company is of the
17 opinion it is unreasonable to set the minimum bill at this level, instead seeking to be gradual
18 with this change. With this consideration, the Company believes it reasonable to set the
19 monthly minimum bill amount at approximately 50% of that amount or \$35. Under the
20 current Residential Standard Service tariff, a \$35 monthly bill would equate to a Basic
21 Service fee of \$14.50 plus usage of about 278 kWh of energy. To put this 278 kWh of
22 energy consumption in perspective, the average Kansas Central residential customer uses

³ Dr. Ahmad Faruqui Affidavit in Kansas Generic Docket on Distributed Generation Rate Design, March 17th 2017, page 6. (Docket 16-GIME-403-GIE)

1 10,242 kWh per year or about 853.5 kWh per month.⁴ The 278 kWh consumption amount
2 is approximately one third of that average. Considered another way, a window mounted
3 room air conditioner⁵, operating ten hours a day for about 28 days will consume about 280
4 kW of energy.

5 **Q: Does this rate design comply with the views provided by the Supreme Court remand?**

6 A: Again, from my perspective as a practitioner and expert in matters of electric rate design,
7 I say yes. Concerning the “economic free rider problem” the minimum bill design provides
8 a degree of mitigation by ensuring recovery of some revenue from all residential customers
9 and since applicable to all, it plainly satisfies the antidiscrimination provision of K.S.A.
10 66-117d.

11 **Q: If approved, how would the Company propose to deploy the minimum bill?**

12 A: The minimum bill amount would be applied to each of the Company residential rate tariffs
13 and applied to future, monthly billing. Additionally, the Company will provide educational
14 information regarding the grid access charge for customers to understand the charge and
15 impact on bills. Information would be provided with customer bills as well as on the
16 website. For customers who don’t receive a paper bill, email is an effective way to reach
17 customers with information about the charge. Internal customer service representatives
18 would also be trained on the charge, so that they may assist customers who inquire.

19 Similar to the grid access charge, if approved, the minimum bill would produce
20 revenues not contemplated in the Company’s last general rate proceeding. Kansas Central
21 proposes that the incremental revenues produced by the minimum bill be placed in a
22 deferral account and fully considered in the Company’s next general rate proceeding.

⁴ Westar Minimum Filing Requirements, Section 8, Schedule 8-F, page 9

⁵ Assuming a 1,000-watt room air conditioner unit.

1 **Q: What is the expected customer impact of the minimum bill?**

2 A: Customers using more energy than about 278 kWh per month would exceed the minimum
3 bill amount and would pay their bill as calculated normally. A customer with zero monthly
4 usage would normally receive a bill of \$14.50 reflecting the Basic Service Fee defined for
5 the rate. Under the minimum bill approach this customer would now receive a bill of \$35.
6 All residential customers would be subject to this minimum.

7 **Q: Since the minimum bill is applicable to all customers, did you examine the impact to**
8 **low income customers?**

9 A: Yes. To facilitate the review, the Company reviewed the customer bills occurring during
10 the 2016 calendar year in 92 zip codes where more than 40% of the residents in that zip
11 code area have an annual income of less than \$25,000. We chose this amount as we are
12 reliant on publicly available data concerning income⁶ and the next income level in the data
13 was \$50,000 per year. Within these zip codes we identified that 18% or 139,688 of the
14 bills received in these zip codes were less than \$35 during this period. Putting that number
15 into context, if all approximately 614,000 Kansas Central residential customers received
16 one bill each month of a year, the number of bills would be 7,368,000.

17 The Company has explored the impact data further, but as you move deeper into
18 the details there are found other plausible causes for the observed low bill amounts other
19 that being associated with low income customers. The two conditions with the most
20 potential impact to this count are residential accounts not associated with a household, such
21 as out buildings, garages, and farm-related uses and second, accounts associated with
22 unoccupied rental homes and apartments. In both of these cases, the total usage would

⁶ Internal Revenue Service, Statistics of Income, Tax Stats - Individual Income Tax Statistics

1 cause them to be captured by the queries and to overstate the impact numbers offered earlier
2 in this answer.

3 The impacts of this alternate proposal are largely unavoidable if the rate mechanism
4 focuses solely on being non-discriminatory and does not take into account the type of
5 service being received under the rate.

6 **Q: Does this make the grid access charge a more appropriate rate design?**

7 A: Yes. The Company supports the grid access charge as its preferred rate design approach
8 under this docket. The minimum bill option is viable but more impactful to a larger number
9 of Kansas Central customers.

10 **Q: Does that conclude your testimony?**

11 A: Yes, it does.

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a EVERGY KANSAS CENTRAL

SCHEDULE RS-DG

(Name of Issuing Utility)

Replacing Schedule RS-DG Sheet 1EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 28, 2018No supplement or separate understanding
shall modify the tariff as shown hereon

Sheet 1 of 5 Sheets

RESIDENTIAL STANDARD DISTRIBUTED GENERATION**AVAILABLE**

Electric Service is available under this rate schedule at points on the Company's existing distribution system to customers using electric service for residential purposes. Any customer-generator operating or adding generation under an interconnection agreement connecting to Evergy Kansas Central's distribution system after October 1, 2018 must take service under this rate schedule.

APPLICABLE

Applicable to residential customers that have dwelling unit(s) each having separate kitchen facilities, sleeping facilities, living facilities and permanent provisions for sanitation. This rate schedule is restricted to residential electric service used principally for domestic purposes in customer's household, home, detached garage on the same premise as customer's home, or place of dwelling for the maintenance or improvement of customer's quality of life. Service to customers in rural areas through a single meter under this schedule may also use electric service in farm buildings for ordinary farm use providing that such buildings are adjacent to the customer's dwelling unit. However, this schedule is not applicable for crop irrigation, commercial dairies, hatcheries, feed lots, feed mills or any other commercial enterprise. This schedule is not applicable to backup, breakdown, standby, supplemental, short term, resale or shared electric service.

CHARACTER OF SERVICE

Alternating current, 60 hertz, single phase, at nominal voltages of 120 or 120/240 volts.

Issued _____
Month Day Year

Effective August 6 2019
Month Day Year

By _____
Darrin Ives, Vice President

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a EVERGY KANSAS CENTRAL

SCHEDULE RS-DG

(Name of Issuing Utility)

Replacing Schedule RS-DG Sheet 2EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

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Sheet 2 of 5 Sheets

RESIDENTIAL STANDARD DISTRIBUTED GENERATION**ELECTRIC SERVICE****NET MONTHLY BILL**

BASIC SERVICE FEE \$14.50

ENERGY CHARGEWinter Period - Energy used in the billing months of October through May.

<u>7.3512¢ per kWh</u>	<u>first 500 kWh</u>
<u>7.3512¢ per kWh</u>	<u>next 400 kWh</u>
<u>6.0089¢ per kWh</u>	<u>additional kWh</u>

Summer Period - Energy used in the billing months of June through September.

<u>7.3512¢ per kWh</u>	<u>first 500 kWh</u>
<u>7.3512¢ per kWh</u>	<u>next 400 kWh</u>
<u>8.1088¢ per kWh</u>	<u>additional kWh</u>
<u>4.5840¢ per kWh</u>	<u>ENERGY CHARGE</u>

DEMAND CHARGE~~Winter Period - Demand set in the billing months of October through May.~~
~~\$3.00 per kW~~~~Summer Period - Demand set in the billing months of June through September.~~
~~\$9.00 per kW~~**GRID ACCESS CHARGE**Applicable to customer bills when private customer generation is installed.
\$3.00 per kW of installed capacity (DC)Issued _____
Month Day YearEffective August 6 2019
Month Day YearBy _____
Darrin Ives, Vice President

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a EVERGY KANSAS CENTRAL

SCHEDULE RS-DG

(Name of Issuing Utility)

Replacing Schedule RS-DG Sheet 3

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 28, 2018

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

Sheet 3 of 5 Sheets

RESIDENTIAL STANDARD DISTRIBUTED GENERATION

Plus all applicable adjustments and surcharges.

MINIMUM MONTHLY BILL

The Basic Service Fee, plus the minimum specified in the Electric Service Agreement, plus all applicable adjustments and surcharges.

~~BILLING DEMAND~~

~~Customer's average kilowatt load during the 60-minute period of maximum use that occurs in the demand billing period during the month.~~

~~DETERMINATION OF PEAK BILLING PERIOD~~

~~For purposes of this rate schedule, the demand billing period shall be daily the hours of 2:00 pm through 7:00 pm Central Time, except for weekends, New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.~~

Issued _____
Month Day Year

Effective August 6 2019
Month Day Year

By _____
Darrin Ives, Vice President

THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a EVERGY KANSAS CENTRAL

SCHEDULE RS-DG

(Name of Issuing Utility)

Replacing Schedule RS-DG Sheet 4EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 28, 2018No supplement or separate understanding
shall modify the tariff as shown hereon

Sheet 4 of 5 Sheets

RESIDENTIAL STANDARD DISTRIBUTED GENERATION**ADJUSTMENTS AND SURCHARGES**

The rates hereunder are subject to adjustment as provided in the following schedules:

1. Retail Energy Cost Adjustment
2. Property Tax Surcharge
3. Transmission Delivery Charge
4. Environmental Cost Recovery Rider
5. Renewable Energy Program Rider
6. Energy Efficiency Rider
7. Tax Adjustment

Plus all applicable adjustments and surcharges.

DEFINITIONS AND CONDITIONS

1. The initial term of service under this rate schedule shall be one year. Company reserves the right to require the customer to execute an Electric Service Agreement with an additional charge, or special minimum and or a longer initial term when additional facilities are required to serve such customer.
2. A Customer-Generator is the owner or operator of a facility which:
 - a. Is located on premises owned, operated, leased, or otherwise controlled by the Customer-Generator and provides power to a facility located on that same premise;
 - b. Is interconnected and operates in parallel phase and synchronization with the Company facilities;
 - c. Is intended primarily to offset part or all of the Customer-Generator's own electrical energy requirements; and
 - d. Contains a mechanism, approved by the Company that automatically disables the unit and interrupts the flow of electricity back onto the Company's electric lines in the event that service to the Customer-Generator is interrupted.

Issued _____
Month Day YearEffective August 6 2019
Month Day YearBy _____
Darrin Ives, Vice President

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a EVERGY KANSAS CENTRAL

SCHEDULE RS-DG

(Name of Issuing Utility)

Replacing Schedule RS-DG Sheet 5

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 28, 2018

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

Sheet 5 of 5 Sheets

RESIDENTIAL STANDARD DISTRIBUTED GENERATION

- 3. Individual motor units shall not exceed five horsepower, unless otherwise agreed upon prior to installation.
- 4. Service under this rate schedule is subject to Company's General Terms and Conditions presently on file with the State Corporation Commission of Kansas and any modification subsequently approved.
- 5. All provisions of this rate schedule are subject to changes made by order of the regulatory authority having jurisdiction.

Issued _____
Month Day Year

Effective August 6 2019
Month Day Year

By _____
Darrin Ives, Vice President

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a/ EVERGY KANSAS CENTRAL

SCHEDULE RS

(Name of Issuing Utility)

Replacing Schedule RS Sheet 1EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

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shall modify the tariff as shown hereon

Sheet 1 of 6 Sheets

RESIDENTIAL STANDARD SERVICE**AVAILABLE**

Electric Service is available under this rate schedule at points on the Company's existing distribution system to customers using electric service for residential purposes. Residential Standard Service is not available to new customer-generators operating or adding generation under an interconnection agreement connecting to Evergy Kansas Central's distribution system after October 1, 2018.

APPLICABLE

Applicable to residential customers that have dwelling unit(s) each having separate kitchen facilities, sleeping facilities, living facilities and permanent provisions for sanitation. This rate schedule is restricted to residential electric service used principally for domestic purposes in customer's household, home, detached garage on the same premise as customer's home, or place of dwelling for the maintenance or improvement of customer's quality of life. Service to customers in rural areas through a single meter under this schedule may also use electric service in farm buildings for ordinary farm use providing that such buildings are adjacent to the customer's dwelling unit. However, this schedule is not applicable for crop irrigation, commercial dairies, hatcheries, feed lots, feed mills or any other commercial enterprise. This schedule is not applicable to backup, breakdown, standby, supplemental, short term, resale or shared electric service.

CHARACTER OF SERVICE

Alternating current, 60 hertz, single phase, at nominal voltages of 120 or 120/240 volts.

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Darrin Ives, Vice President

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a/ EVERGY KANSAS CENTRAL

SCHEDULE RS

(Name of Issuing Utility)

Replacing Schedule RS Sheet 2EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 27, 2018No supplement or separate understanding
shall modify the tariff as shown hereon

Sheet 2 of 6 Sheets

RESIDENTIAL STANDARD SERVICESTANDARD ELECTRIC SERVICENET MONTHLY BILL

BASIC SERVICE FEE \$14.50

ENERGY CHARGE

Winter Period - Energy used in the billing months of October through May.

7.3512¢ per kWh	first 500 kWh
7.3512¢ per kWh	next 400 kWh
6.0089¢ per kWh	additional kWh

Summer Period - Energy used in the billing months of June through September.

7.3512¢ per kWh	first 500 kWh
7.3512¢ per kWh	next 400 kWh
8.1088¢ per kWh	additional kWh

Plus all applicable adjustments and surcharges.

MINIMUM MONTHLY BILLThe ~~Basic Service Fee~~ Minimum Monthly Bill is \$35.00, plus the minimum specified in the Electric Service Agreement, plus all applicable adjustments and surcharges.CONSERVATION USE SERVICE

The energy charge component of this summer period rate for customers whose average daily consumption is less than or equal to 30 kWh for each of the billing months of June, July, August and September will be reduced to the energy rates for the Winter Period.

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a/ EVERGY KANSAS CENTRAL

SCHEDULE RS

(Name of Issuing Utility)

Replacing Schedule RS Sheet 3EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

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RESIDENTIAL STANDARD SERVICE

Customers whose average daily consumption exceeds the 30 kWh usage level in any summer billing month shall have that month's usage and all subsequent energy usage during the summer period billed at the rates for the summer period.

Customer's average daily consumption as used herein shall be the kWh used during the billing period divided by the number of days in the billing period.

RESTRICTED PEAK MANAGEMENT ELECTRIC SERVICE

Restricted Peak Management Electric Service is only available to customers in the Evergy Kansas Central Rate Area and taking service under the Peak Management Electric Service Rate prior to the effective date of this rate schedule. Restricted Peak Management Electric Service Rate is not available to new customers. If an existing customer stops taking service under this rate for any reason the customer may not later return to this rate for service at a later date.

NET MONTHLY BILL

BASIC SERVICE FEE	\$16.50
ENERGY CHARGE	4.4623¢ per kWh
DEMAND CHARGE	

Winter Period - Demand set in the billing months of October through May.
\$2.13 per kW

Summer Period - Demand set in the billing months of June through September.
\$6.91 per kW

Plus all applicable adjustments and surcharges.

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THE STATE CORPORATION COMMISSION OF KANSAS

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SCHEDULE RS

(Name of Issuing Utility)

Replacing Schedule RS Sheet 4EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

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RESIDENTIAL STANDARD SERVICE**MINIMUM MONTHLY BILL**

The Minimum Monthly Bill is \$35.00~~Basic Service Fee~~, plus the minimum specified in the Electric Service Agreement, plus the charge for 1 kW applied in any month that the customer has purchased at least 1 kWh, plus all applicable adjustments and surcharges.

BILLING DEMAND

Customer's average kilowatt load during the 30 minute period of maximum use during the month.

RESTRICTED CONSERVATION USE SERVICE

Restricted Conservation Use Service is only available to customers in the Evergy Kansas South Rate Area taking service under the Conservation Use Service rate prior to the effective date of this rate schedule. If customers taking service under this Restricted Conservation Use Service average daily consumption exceeds 30 kWh in any summer billing month then that month's usage, and all subsequent energy usage shall be billed at the rates for the Standard Electric Service portion of this rate schedule unless the customer qualifies for Standard Conservation Use Service.

Customer's average daily consumption as used herein shall be the kWh used during the billing period divided by the number of days in the billing period.

NET MONTHLY BILL

BASIC SERVICE FEE	\$14.50
ENERGY CHARGE	4.9653¢ per kWh

Plus all applicable adjustments and surcharges.

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a/ EVERGY KANSAS CENTRAL

SCHEDULE RS

(Name of Issuing Utility)

Replacing Schedule RS Sheet 5EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

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RESIDENTIAL STANDARD SERVICEADJUSTMENTS AND SURCHARGES

The rates hereunder are subject to adjustment as provided in the following schedules:

1. Retail Energy Cost Adjustment
2. Property Tax Surcharge
3. Transmission Delivery Charge
4. Environmental Cost Recovery Rider
5. Renewable Energy Program Rider
6. Energy Efficiency Rider
7. Tax Adjustment

Plus all applicable adjustments and surcharges.

DEFINITIONS AND CONDITIONS

1. The initial term of service under this rate schedule shall be one year. Company reserves the right to require the customer to execute an Electric Service Agreement with an additional charge, or special minimum and or a longer initial term when additional facilities are required to serve such customer.
2. The Peak Management Electric Service component of this rate schedule is frozen to existing customers. If at any time, an existing customer elects the Standard Residential Service portion of this rate schedule, the customer cannot then switch to Peak Management Electric Service.
3. A Customer-Generator is the owner or operator of a Facility which:
 - a. Is located on premises owned, operated, leased, or otherwise controlled by the Customer-Generator and provides power to a facility located on that same premise;
 - b. Is interconnected and operates in parallel phase and synchronization with the Company facilities;

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THE STATE CORPORATION COMMISSION OF KANSAS

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SCHEDULE RS

(Name of Issuing Utility)

Replacing Schedule RS Sheet 6EVERGY KANSAS CENTRAL RATE AREA

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RESIDENTIAL STANDARD SERVICE

- c. Is intended primarily to offset part or all of the Customer-Generator's own electrical energy requirements; and
 - d. Contains a mechanism, approved by the Company that automatically disables the unit and interrupts the flow of electricity back onto the Company's electric lines in the event that service to the Customer-Generator is interrupted.
4. Individual motor units shall not exceed five horsepower, unless otherwise agreed upon prior to installation.
 5. A multi-family dwelling, consisting of apartments, each having separate kitchen facilities, sleeping facilities, living facilities and permanent provisions for sanitation, may be served under this schedule if service was initiated prior to December 21, 1978. Charges shall be calculated by multiplying the number of kWh in each block by the number of apartments served; otherwise the Small General Service rate schedule shall apply. Submetering by the customer of any portion of such service is prohibited.
 6. Service under this rate schedule is subject to Company's General Terms and Conditions presently on file with the State Corporation Commission of Kansas and any modification subsequently approved.
 7. All provisions of this rate schedule are subject to changes made by order of the regulatory authority having jurisdiction.

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a EVERGY KANSAS CENTRAL

SCHEDULE RS-DG

(Name of Issuing Utility)

Replacing Schedule RS-DG Sheet 1EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 28, 2018No supplement or separate understanding
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Sheet 1 of 4 Sheets

RESIDENTIAL STANDARD DISTRIBUTED GENERATION**AVAILABLE**

Electric Service is available under this rate schedule at points on the Company's existing distribution system to customers using electric service for residential purposes. Any customer-generator operating or adding generation under an interconnection agreement connecting to Evergy Kansas Central's distribution system after October 1, 2018 must take service under this rate schedule.

APPLICABLE

Applicable to residential customers that have dwelling unit(s) each having separate kitchen facilities, sleeping facilities, living facilities and permanent provisions for sanitation. This rate schedule is restricted to residential electric service used principally for domestic purposes in customer's household, home, detached garage on the same premise as customer's home, or place of dwelling for the maintenance or improvement of customer's quality of life. Service to customers in rural areas through a single meter under this schedule may also use electric service in farm buildings for ordinary farm use providing that such buildings are adjacent to the customer's dwelling unit. However, this schedule is not applicable for crop irrigation, commercial dairies, hatcheries, feed lots, feed mills or any other commercial enterprise. This schedule is not applicable to backup, breakdown, standby, supplemental, short term, resale or shared electric service.

CHARACTER OF SERVICE

Alternating current, 60 hertz, single phase, at nominal voltages of 120 or 120/240 volts.

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THE STATE CORPORATION COMMISSION OF KANSAS

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SCHEDULE RS-DG

(Name of Issuing Utility)

Replacing Schedule RS-DG Sheet 2EVERGY KANSAS CENTRAL RATE AREA

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RESIDENTIAL STANDARD DISTRIBUTED GENERATION**ELECTRIC SERVICE****NET MONTHLY BILL**

BASIC SERVICE FEE \$14.50

ENERGY CHARGE 4.5840¢ per kWh

DEMAND CHARGE

Winter Period - Demand set in the billing months of October through May.
\$3.00 per kW

Summer Period - Demand set in the billing months of June through September.
\$9.00 per kW

Plus all applicable adjustments and surcharges.

MINIMUM MONTHLY BILL

The Minimum Monthly Bill is \$35.00~~Basic Service Fee~~, plus the minimum specified in the Electric Service Agreement, plus all applicable adjustments and surcharges.

BILLING DEMAND

Customer's average kilowatt load during the 60-minute period of maximum use that occurs in the demand billing period during the month.

DETERMINATION OF PEAK BILLING PERIOD

For purposes of this rate schedule, the demand billing period shall be daily the hours of 2:00 pm through 7:00 pm Central Time, except for weekends, New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a EVERGY KANSAS CENTRAL

SCHEDULE RS-DG

(Name of Issuing Utility)

Replacing Schedule RS-DG Sheet 3EVERGY KANSAS CENTRAL RATE AREA

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RESIDENTIAL STANDARD DISTRIBUTED GENERATION**ADJUSTMENTS AND SURCHARGES**

The rates hereunder are subject to adjustment as provided in the following schedules:

1. Retail Energy Cost Adjustment
2. Property Tax Surcharge
3. Transmission Delivery Charge
4. Environmental Cost Recovery Rider
5. Renewable Energy Program Rider
6. Energy Efficiency Rider
7. Tax Adjustment

Plus all applicable adjustments and surcharges.

DEFINITIONS AND CONDITIONS

1. The initial term of service under this rate schedule shall be one year. Company reserves the right to require the customer to execute an Electric Service Agreement with an additional charge, or special minimum and or a longer initial term when additional facilities are required to serve such customer.
2. A Customer-Generator is the owner or operator of a facility which:
 - a. Is located on premises owned, operated, leased, or otherwise controlled by the Customer-Generator and provides power to a facility located on that same premise;
 - b. Is interconnected and operates in parallel phase and synchronization with the Company facilities;
 - c. Is intended primarily to offset part or all of the Customer-Generator's own electrical energy requirements; and
 - d. Contains a mechanism, approved by the Company that automatically disables the unit and interrupts the flow of electricity back onto the Company's electric lines in the event that service to the Customer-Generator is interrupted.

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THE STATE CORPORATION COMMISSION OF KANSAS

EVERGY KANSAS CENTRAL, INC. & EVERGY KANSAS SOUTH, INC., d/b/a EVERGY KANSAS CENTRAL SCHEDULE RS-DG

(Name of Issuing Utility)

Replacing Schedule RS-DG Sheet 4

EVERGY KANSAS CENTRAL RATE AREA

(Territory to which schedule is applicable)

which was filed September 28, 2018

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

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RESIDENTIAL STANDARD DISTRIBUTED GENERATION

- 3. Individual motor units shall not exceed five horsepower, unless otherwise agreed upon prior to installation.
- 4. Service under this rate schedule is subject to Company's General Terms and Conditions presently on file with the State Corporation Commission of Kansas and any modification subsequently approved.
- 5. All provisions of this rate schedule are subject to changes made by order of the regulatory authority having jurisdiction.

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