BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Joint Application of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Approval to Make Certain Changes in their Charges for Electric Service.	**)** **)** **)** **)** **)**	**Docket No. 23-EKCE-775-RTS**

DIRECT TESTIMONY

PREPARED BY

ROBERT H. GLASS, Ph.D.

UTILITIES DIVISION

KANSAS CORPORATION COMMISSION

August 30, 2023

I. STATEMENT OF QUALIFICATIONS

Q. What is your name?

A. Robert H. Glass

Q. By whom and in what capacity are you employed?

A. I am employed by the Kansas Corporation Commission (KCC or Commission) as Chief of the Economics and Rates Section within the Utilities Division.

Q. What is your business address?

A. 1500 S.W. Arrowhead Road, Topeka, Kansas, 66604-4027.

Q. What is your educational background and professional experience?

A. I have a B.A. from Baker University with a major in history. I also have an M.A. and a Ph.D. in economics from the University of Kansas. For 22 years prior to my employment at the Commission, I was employed at the University of Kansas by the Institute for Business and Economic Research, which later became the Institute for Public Policy and Business Research. My primary duty was performing economic research.

Q. Have you previously testified before the Commission?

A. Yes. I provided testimony as a Staff consultant for Docket Nos. 91-KPLE-19 140-SEC and 97-WSRE-676-MER. As an employee of the Commission, I have testified in numerous rate case and non-rate case dockets.

II. INTRODUCTION

Purpose

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to evaluate Evergy's proposed rate changes and to sponsor Staff's rate design.

Organization

Q. How is your testimony organized?

A. First, I will discuss the Rate Modernization Plan. Then, I will discuss the Changes in Rate Design Structure. Next, I will discuss the Time of Use Rates. Then, I will discuss Rate Design. Finally, I will conclude by recommending the Commission approve a modified TOU rate, eliminate certain rates, and accept Staff's rate design.

III. ANALYSIS

Rate Modernization Plan

Q. What is Evergy's Rate Modernization Plan?

A. Evergy's Rate Modernization Plan is Evergy's "view of the programs and rates needed to move Kansas toward greater customer choice, increased customer satisfaction and better grid management."[1]

In her testimony, Evergy Witness Kim Winslow responds to the question "Please describe Evergy's Rate Modernization Plan" by describing a process that began in 2020 with three purposes: (1) Respond to the regulatory obligations in Kansas and Missouri; (2) Balance "forces to increase overall customer satisfaction while recovering Evergy's revenue requirement;" and (3) Align tariffs between

[1] Evergy Direct Testimony Prepared by Kim Winslow, p. 4, (April 25, 2023) (Winslow Direct).

EKC and EKM.[2] She also notes that the Rate Modernization Plan is not a one-shot approach to modernizing rates in the current docket, but a longer process that Evergy expects to progress over several rate cases.

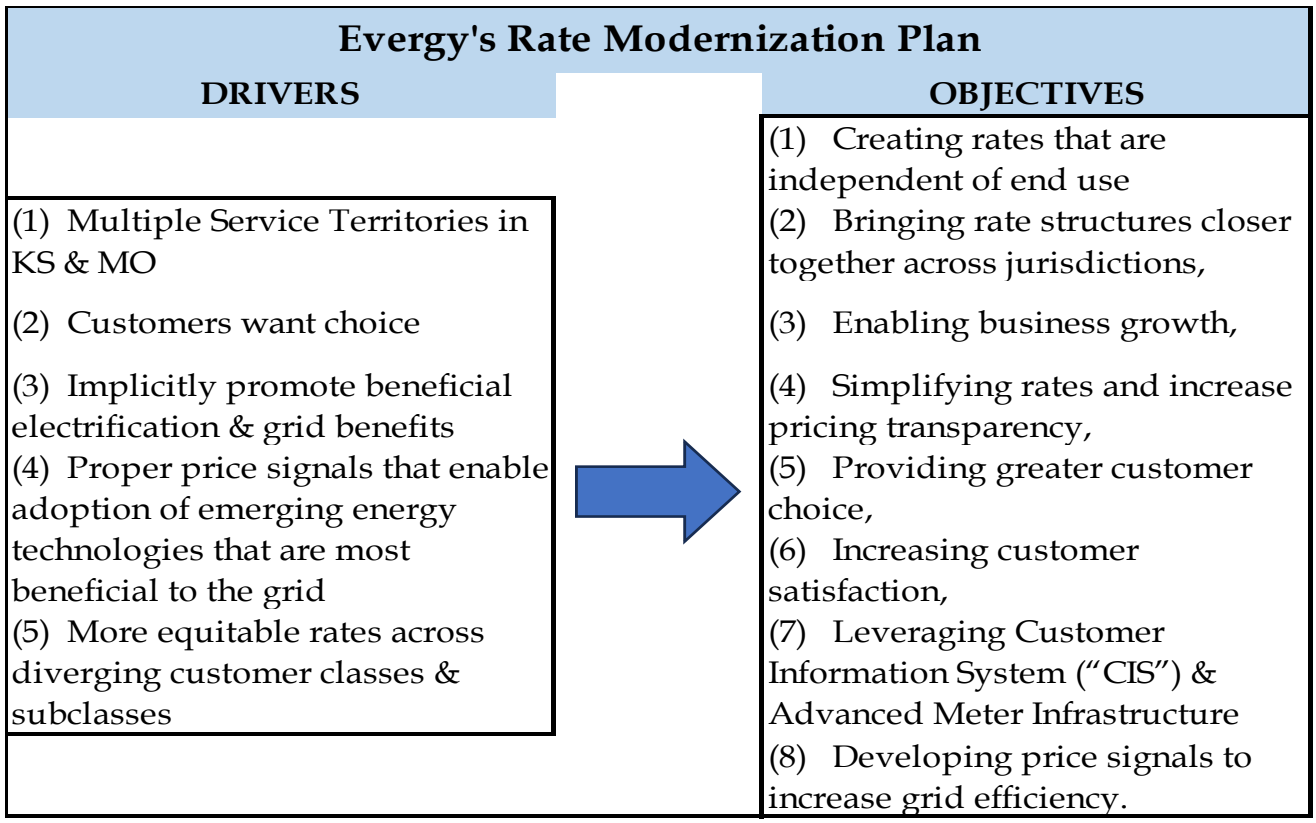
Drivers and Objectives of the Rate Modernization Plan

Q. Does Evergy provide more details of the Rate Modernization Plan?

A. Yes. Evergy lists five drivers of the Rate Modernization Plan that led to eight objectives that are listed in Figure 1 below. The five drivers are listed on the left-hand side of the figure and the eight objectives are listed on the right-hand side of the figure.[3] The drivers are a combination of facts on the ground (Evergy has multiple service territories in two different jurisdictions), observed attitudes of customers (the demand for choice), federal public policy goals (beneficial electrification), and basic goals of rate design (proper price signals and equitable rates).

[2] Winslow Direct, p. 16.
[3] Winslow Direct, p. 17.

Figure 1



Potential Problems with the Drivers of the Plan

Q. Are any of the drivers listed by Evergy that may have limitations or restrictions to implementation?

A. One possible example is Evergy's desire to implicitly promote beneficial electrification and grid benefits. Any energy efficiency programs that promote one fuel source over another was rejected by the Commission in Docket No. 09-GIMX-160-GIV.[4] Presumably, the Commission's precedent on this issue would apply to non-energy efficiency programs as well. Thus, any beneficial electrification or grid

[4] Amended Order to Close Docket, Docket No. 09-GIMX-160-GIV, March 23, 2012. "Utility providers shall continue to offer energy-efficiency programs in a manner that does not bias users toward a particular fuel source." Unnumbered page 1. In addition, the order was determined to be precedential.

benefit programs will have to be carefully evaluated to determine whether a fuel source bias is being promoted.

Inherent Issues with the Objectives of the Plan

Q. Do the objectives of the Rate Modernization Plan flow from the drivers?

A. For the most part, yes.

Q. Are there any inherent issues with the objectives of the plan?

A. Yes. I think that simplifying rates and making them more transparent, Objective (4), and improving customer price signals, Objective (8), are inherently contradictory—improving customer price signals will make rate design more complex. For example, time-of-use (TOU) rates are more complex and more difficult to explain to customers than the standard fixed charge/energy charge rate design. In addition, determining how to leverage CIS and AMI infrastructure Objective (7)—what is the lever and what is the fulcrum and where is the "mechanical advantage."

For Objective (2)—bringing rates closer together across jurisdictions, Evergy provides a justification for reducing the difference in rates across jurisdictions as the recognition "that customers simply see Evergy as one company and our customers and shareholders will benefit from increasing consistency with all customer-facing elements of our operations."[5]

There are two interlocking problems with forcing rates across jurisdictions to be similar. First, rate design is a zero sum game—if one jurisdiction has higher

[5] Winslow Direct, p. 16.

rates than another, forcing the rates to be the same will create winners and losers. Second, the perception of creating winners and losers becomes a subsidy issue if one service territory has higher costs than the other. And the subsidy problem can be exacerbated if the regulatory agencies and the general regulatory milieu in one jurisdiction are more cost conscience than the other.

Should Cost & Rate Minimization be as an Objective of the Plan?

Q. Does Evergy explicitly recognize cost and rate minimization as an objective?

A. No. Cost and rate minimization are not among the five drivers or eight objectives.

Q. Are you aware of whether Evergy implicitly recognizes cost and rate minimization as an objective?

A. Yes. Staff issued Staff Data Request No. 160 to inquire about this issue. Evergy's response was:

> Evergy developed the objectives holistically and the objectives are guiding principles that Evergy would consider as it furthers its rate structures, programs, and offerings for its customers. Evergy recognizes that the objectives could be perceived to be contradictory, but this is mitigated when viewed in the broader, strategic nature of the objectives. No rate design "criteria" exists to override one objective over the other. However, Evergy's North Star is developing rates that are just and reasonable to ensure efficient and sufficient service.

Q. Is Evergy's response adequate?

A. Yes. Two important aspects of Evergy's response are reassuring to Staff. First, Evergy's recognition of the potential for internal conflicts among the objectives. Second, that Evergy's overall guiding principle with rate design is just and reasonable rates and that Evergy's overall guiding principle with cost control is efficient and sufficient service.

Q. Why is Evergy's recognition of potential conflicts among the objectives reassuring?

A. Any time that a list of objectives is established, if the objectives are not duplicative, then there will almost certainly be conflict among the objectives. As an example, consider the use of cooperative game theory to allocate cost among individuals. Two of the more popular cooperative game allocations are the Shapley Value and the Nucleolus. The Shapley Value allocates cost based on the average marginal cost for each player in all possible coalitions while the Nucleolus minimizes the dissatisfaction of all possible coalitions. Both equilibrium concepts are similar, and both would fit within a utilitarian perspective of fairness. But if there are more than three agents in the game, the Shapley Value and the Nucleolus do not necessarily give the same equilibrium point.[6] Thus, Evergy's recognition of potential conflicts in applying the eight objectives of the Rate Modernization Plan is reassuring. Recognition of the conflicts does not eliminate them, but it does mean that the conflicts will not be a surprise when they appear.

Q. Why is Evergy's guiding principle of just and reasonable rates and efficient and sufficient service reassuring?

A. For two major reasons. First, just and reasonable rates and efficient and sufficient service are standard legal criteria for regulated utilities; and second, for an economist, the criteria can be operationalized as public policy criteria. Because I am not a lawyer, I will not address the legal criteria in my testimony. However, the

[6] H. P. Young, N. Okada, and T. Hashimoto, "Cost Allocation in Water Resources Development," ***Water Resources Research***, Vol. 8, No. 3 (June 1982), pp. 463 – 475. Table 7 on page 472 shows the difference between the Shapley Value and the Nucleolus solutions.

operationalization of just and reasonable rates and efficient and sufficient service is of paramount importance to me.

Just and reasonable rates implies both efficient rates (reasonable rates) and equitable rates (just rates). Just and reasonable rates set constraints on the utility's treatment of its customers. And efficient and sufficient service implies least cost service (efficient service) and sufficient service to meet customer demand (since no one is excluded service, service is equitable). Thus, the demand and supply sides of the regulated electricity market were covered by just and reasonable rates and efficient and sufficient service.

Q. How then to operationalize the legal criteria as for policy evaluation?

A. The basic public policy criteria for an intervention in a market is whether the intervention is in the public interest, and an intervention is in the public interest if it improves social welfare. There are two basic means for improving social welfare: (1) increasing economic efficiency and/or (2) improving equity. Evaluating policy leads back to whether the policies increase economic efficiency and/or improve equity.

The evaluation of a policy to determine its effect on economic efficiency involves using benefit-cost analysis. And the best short description of equity evaluation involves determining the effect of a policy on "redistribution of income, equality of opportunity, and protection of rights to life and property."[7] Ideally, policy makers would like to achieve the goals of economic efficiency and equity

[7] Arye Hillman, *Public Finance and Public Policy*, second edition, 2009, p. 3.

simultaneously, but often there is a conflict between economic efficiency and equity. Thus, evaluating whether policies and programs are in the public interest requires a two-step process. First, the effects of the policies and programs on economic efficiency and equity must be determined. Second, these effects on economic efficiency and equity must be weighed to decide if the policies and programs advance social welfare.

Q. What about the problem of bringing rates closer?

A. For the most part, bringing rates together can be accomplished, but it will be a long and difficult process. As an example, aligning the old Kansas Power and Light (KPL) and Kansas Gas and Electric (KG&E) rates, after the merger that eventually created Westar, took 20 years. And there are still some rates that are available only in one of the two former service territories, for example school rates.

I would expect bringing EKC and EKM rates together will be even harder than bringing KPL and KG&E rates together for a couple of reasons. First, rate consolidation takes into consideration legacy rate designs and the level of rates currently in effect as well as the types of customers and nature of each service area. Second, the service territories have different energy use behavior and different industrial structures, and that leads to different cost structures for the service territories. In addition, Evergy would like Evergy Kansas Metro and Missouri Metro to be similar, but they are in different regulatory jurisdictions with seemingly different regulatory approaches.

Q. What is Staff's most important criteria for the Rate Modernization Plan?

A. Like all plans, the most important aspect of any plan is its implementation. Without flexible and adaptive implementation, the Rate Modernization Plan could result in a more complex and opaque set of customer rates rather than "simplifying rates and increase pricing transparency."

Changes in Rate Design Structure

Q. Has Evergy begun the implementation of its Rate Modernization Plan?

A. Yes. Evergy Witness Marisol Miller provides a description of Evergy's request to change the structure of EKM's and EKC's rate design. Evergy wants to have the same seasonal alignment in EKM's and EKC's rates, "establish Bright Lines and a new rate class" for its EKM commercial and industrial customers, transition away from EKM's hours of use commercial and industrial rate design, align rate designs between the different jurisdictional utilities that comprise Evergy, and generally cleanup and simplify existing rates.[8]

Seasonal Alignment

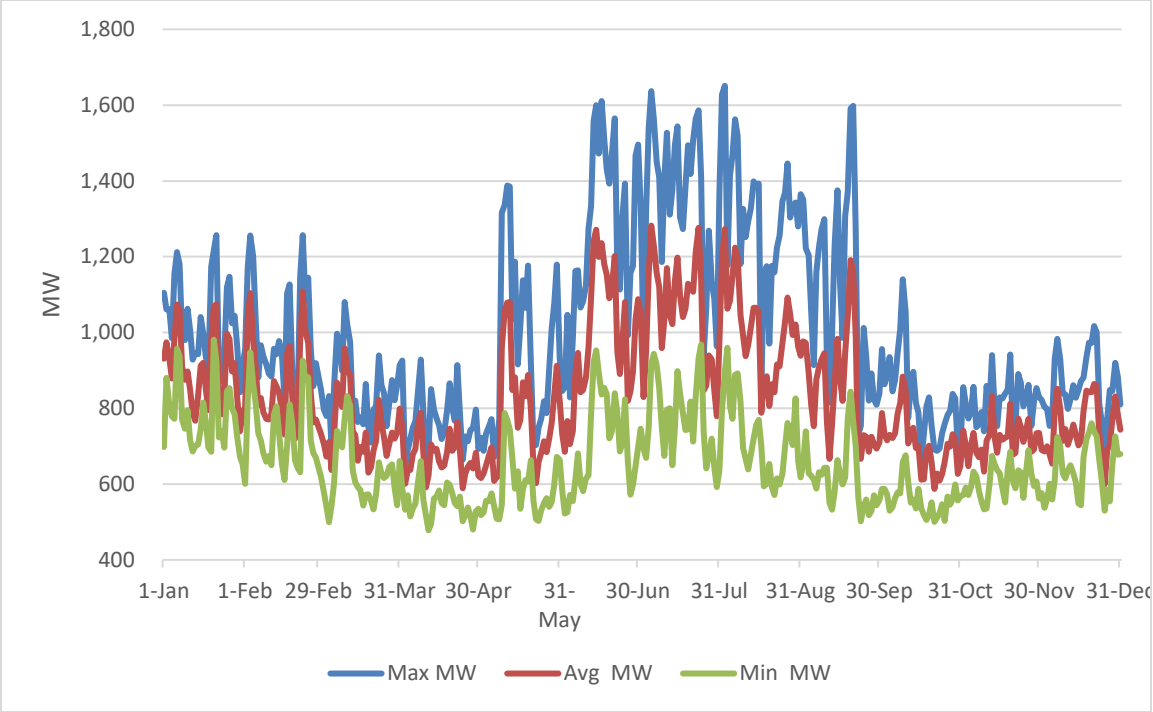
Q. What is seasonal alignment of rates?

A. In Kansas, there are basically three different electric demand seasons: summer, winter, and shoulder, which includes spring and fall. Because of air conditioning, electric utilities in our area tend to peak in the summer.[9] The next highest usage period in winter is because some customers have electric space heating. Finally, the shoulder months are a period of relatively low usage.

[8] Evergy Direct Testimony Prepared by Marisol Miller, p. 4, (April 25, 2023), (Marisol Direct).
[9] Liberty Utilities, the old Empire, is an exception because it has a winter peak that is driven by electric space heating.

EKM and EKC have different definitions of winter and summer. For EKM, summer is May 16 through September 15 while for EKC, summer is June 1 through September 30. Evergy decided that EKM should adopt EKC's definition of summer. Evergy Witness Miller provides a compelling demonstration of the appropriateness of this decision with a graph of daily peak, average, and minimum loads for EKM on page 7 of her testimony that is reproduced below as Figure 2.

Figure 2



Q. Will the seasonal alignment affect EKM's customers' bills?

A. Yes, but only slightly. Evergy estimates that it will lower its revenue recovery by about $280,000 or a reduction in revenue of about 0.05%.

Q. What is Staff's recommendation?

A. Staff recommends that the Commission approve the change in the definition of summer in the EKM rates to the definition of summer in the EKC rates.

Establishing Bright Lines for Commercial and Industrial Customers

Q. What are Bright Lines?

A. "Bright Lines" is a term used to emphasize the creation of thresholds among customer classes in order to prevent customers from moving back and forth between rate classes solely at the customer's discretion.

Q. Why is it a problem if customers can change rate classes at their own discretion?

A. Frequent switching among rate classes increases revenue uncertainty for regulated utilities. The rates are set to allow the utility the opportunity to recover its approved revenue requirement. For example, a small change in the former Large Power Class's rate design ended up eliminating the class and costing KCP&L about a million dollars. In order to establish effective revenue recovery, customers need to remain in the rate classes where the rate design was established based on their usage behavior. This does not mean that if a customer grows (or shrinks) significantly in usage, they should not be allowed to change rate classes. But barring a significant change in usage, customer's need to remain in the rate class where the rate design was establish based on their behavior in order to reduce revenue uncertainty for the utility.

Q. Does the Commission have any recent experience with the establishment of Bright Lines?

A. Yes. Westar was experiencing revenue instability because of its Commercial and Industrial rates about 10 years ago. In the 15-WSEE-115-RTS docket, the problem was ameliorated by the use of a set of bright lines among customer classes.[10]

[10] Direct Testimony of John Wolfram, Docket No. 15-WSEE-115-RTS, (Wolfram 115 Direct), pp. 12, 32.

Q. What is Evergy proposing here?

A. Evergy "concluded that Bright Lines of 30-200-1,500 maximum kW for Small, Medium, and Large General Service classes, respectively, along with the creation of a Large Power Class above 1,500 kW, would be most appropriate for the EKM jurisdiction."[11]

Implementation of Bright Lines and Eliminating Hours of Use Energy Charges

Q. Will there need to be a change in EKM's rate design to implement the change?

A. Yes. EKM Commercial and Industrial rate design is dominated by a hybrid rate design that uses customer charges, facilities charges, demand charges, and hours of use energy rates. The hours of use energy rates include an implicit demand charge in the first block. In order to transparently create the Bright Lines, the demand charges need to be explicit. Thus, the hours of use energy charges need to be eliminated.

Q. Is the hours of use energy charge like a time of use (TOU) rate?

A. No. A TOU rate establishes a different rate for different parts of the day. For example, a peak rate for the time during the day that the utility usually faces its peak demand, and an off-peak rate otherwise. Additional time periods can be added to encourage usage during periods of normally low usage, such as a super off-peak rate from midnight to six in the morning in the summer.

The hours of use rate is dependent upon the maximal demand on the part of the customer and encourages a high load factor. For example, assume that a customer has a demand of 10 kW and the hours of use rate is set up for blocks of up to 100

[11] Miller Direct, p. 10.

hours, 101-200, and 201 and above with a sharply lower rate in the second block and an even lower rate in the last block. At a demand of 10 kW, it would take 1,000 kWh to fill the first hours block: 100 hours. After customers consume 1,000 kWh, they are transitioned into the second block of 101-200 hours. After the customers consume another 1,000 kWh or a total 2,000 kWh, they are transitioned into the third hours block. Since each block has a lower energy charge, the rate design creates an incentive to use more energy but maintain the same level of demand, or in other words, customers are incentivized to increase their load factor.

Q. Is Evergy willing to eliminate its hours of use rate in the EKM jurisdiction?

A. Yes. The company hired the Brattle Energy Group to study the transition away from the hours of use energy charge "to a more standard and more transparent energy charge calculation."[12]

Q. What is Evergy proposing?

A. For Small General Service customers, Evergy is proposing seasonal (summer and winter) time of use energy charges with a customer charge but no demand charge. For the Medium and Large General Service customers, Evergy is proposing flat summer and winter demand charges with summer and winter time of use energy charges.

Q. Will all Commercial and Industrial customers be transitioned to the new rates?

A. No. Evergy has not settled on a method for integrating TOU rates with net metering. Those Commercial and Industrial customers that have net metering will

[12] Miller Direct, p. 22.

remain on the hours of use rate until the integration of TOU rates and net metering is resolved.

Elimination of Some Rates in the EKM Service Territory

Q. Does Evergy propose elimination of rates other than the hours of use rates?

A. Yes. Evergy has a number of frozen rates in EKM and EKC and proposes elimination of all frozen rates. Starting in the EKM service territory, Evergy wants to eliminate the 2 Meter Heat rate (frozen January 1, 2007) and the 2 Meter Electric Heating and Electric Water Heating (frozen March 1, 1999).

Q. Why does Evergy want to eliminate these rates?

A. Evergy wants to move away from end-use rates, and heating discounts are a classic example of an end-use rate.

Q. What is the problem with end-use rates?

A. End-use rates were designed as proxies for TOU rates before more sophisticated meters made TOU rates practical for a wide spectrum of customers. For example, heating discounts. For residential customers, most heating takes place in the winter, and historically that has been a non-peak period for Evergy. Thus, discounts for heating are a proxy for energy use in a non-peak season with a large amount of energy used at night for heating, which is a non-peak time period. But with better meters, proxies are no longer needed for TOU rates.

Q. How many customers will be affected by this change?

A. Evergy estimates there are still 11,940 customer on these rates.

Q. If customers invested in electric space heating assuming they would get a discount, is it fair to take that discount away after they have made the investment?

A. There are at least two factors that mitigate the effect of the change in rates on the investment. First, it has been more than 15 years since customers have had the incentive to invest in electric space heating with a second meter. The freezing of the rate was a signal that the rate would probably not continue forever. Thus, the investment seems to have been remunerated. Second, customers with electric space heating have the option of choosing a TOU rate that provides a rate discount during winter nights unless they are net metering customers.

Q. What other rate changes is Evergy requesting?

A. Evergy wants to move customers on the Residential Other rate to the Residential Standard rate and eliminate the Residential Other rate.

Q. What is the Residential Other rate?

A. The Residential Other rate was designed for residential customers that have "well pumps, barns, machine sheds, detached garages, etc., and whose corresponding usage would not currently qualify under any other residential rate."[13]

Q. Why does Evergy want to eliminate the Residential Other rate?

A. There are only 472 customers on the rate and Evergy considers the above listed reasons for being on the rate as extensions of residential electric usage.

Q. Are there any other rates in EKM that Evergy wants to eliminate?

A. Yes. Evergy has a time of day rate that has been frozen since 2015 and only has 40 customers on it. Since Evergy has a TOU rate, the time of day rate seems

[13] Miller Direct, p. 17.

redundant. However, the time of day rate is more moderate than the current TOU rate.

Elimination of Some Rates in the EKC Service Territory

Q. What rates does Evergy want to eliminate from the EKC service territory?

A. Evergy has a number EKC rates they want to eliminate. Following is a list taken from Evergy Witness Miller's testimony:

(1) Residential

(a) Multi-Unit Rate (frozen) from the Residential Standard Service Rate

(b) Conservation Use Service Factor from Residential Standard Service Rate

(c) Restricted Conservation Use Service Rate (frozen)

(d) Restricted Peak Management Electric Service Rate (frozen)

(e) Residential Electric Vehicle (EV) Rate

(2) Commercial & Industrial

(a) Off Peak Service Rate (Create new Off-Peak Rider)

(b) Dedicated Off Peak Service Rate

(c) Generation Substitution Rate

(d) Small General Service Recreational Lighting Rate

Q. Do you agree eliminating rates codes is a good idea?

A. In general, elimination of rate codes in EKC is a good idea. I counted 17 different rate codes in the Small General Service class with at least 6 rate codes having identical rate designs. I will just note a few aspects about some of these rates.

Multi-Use Rate: "The Residential Service tariff includes a provision frozen since 1978 that allows single metered multiple occupancy residential buildings to take

service under the Residential tariff. This represents a stark difference when compared to Evergy's other jurisdictions that bill these kinds of customers on commercial rates."[14] Although these are multiple occupancy buildings, the average usage per bill is about 1,300 kWh, which is not far from the average for Residential homeowners. In other words, it does not distort the Residential Class billing determinants to include these residences in the Residential class. But they do seem more like a small business than a residence.

Conservation Use Service: This rate has been frozen since 2006. Its purpose is to "disincentivize energy usage during the summer billing months by offering a lower energy rate to customers who kept their average daily consumption under 30 kwh (equal to 900 kwh for a standard 30-day monthly bill) during the summer billing months."[15] The average usage by the customer on the conservation rate is a little over 900 kWh a month, but only 6.7% of the usage is in the summer. And the customer charge is the same as for regular residential customers, there is no demand charge, and the energy rate is low—4.3681¢ per kWh compared to 7.1987 per kWh for regular residential customers.

Restricted Peak Management Electric Service: This rate has also been frozen since 2006. Its purpose was to provide a discount to space heating customers as was explained to me by Westar years ago. It is a rate design with a higher customer charge—$16.50 rather than $14.50 for regular residential, a relatively low demand charge—$2.13 in the winter and $6.91 in the summer per kW, and a low energy

[14] Miller Direct, p. 45.
[15] Miller Direct, p. 45.

charge—4.3681¢ kWh in both winter and summer. What distinguishes this rate, and makes it applicable as a space heating discount, is that the demand used for the demand charge is non-coincidental peak demand. Space heating, has inexpensive demand and energy rates in the winter, and if demand is controlled in the summer, lower bills because of the inexpensive summer energy rate. However, Evergy found in its review process that 63% of the customers on this rate would experience a reduced bill if they moved to the regular residential rate.

Off-Peak and Dedicated Off-Peak Service: The Off-Peak Service has only four customers and the Dedicated Off-Peak Service had only two customers during the test year and as of June 2023 it has no customers. These are two of the 17 rate codes that I counted in the Small General Service class.

Small General Service Recreational Lighting: In order for EKC to be consistent with EKM, Evergy wants to move approximately 450 customers on this rate either to a new Off-Peak Lighting rate in the Lighting class or shift the customers to the Small General Service Unmetered rate. Since lighting is unmetered, the shift to the unmetered class has a logic to it.

Recommendation

Q. What is Staff's recommendation concerning the elimination or freezing of rates?

A. Staff agrees that the rates suggested for elimination have good substitute rates that the customers can move to without a large rate shock. And part of the reason for the expected increase in rates is due to the unusually low rates these customers

currently have. Additionally, eliminating these rates would reduce some of the confusion in the rate design.

Time of Use Rates

Q. Does Evergy have time of use rates?

A. Yes. Evergy has time of use rates in both EKM and EKC. In EKM, KCP&L proposed a TOU pilot in the 18-KCPE-480-RTS with a cap of 1,000 customers and a marketing and education budget of $2.2 million. The enrollment cap was surpassed in January 2021 and as of March 17, 2023 there were 2,892 customers on the rate.[16]

In EKC, Westar introduced a pilot TOU rate as part of the Lawrence Project—the introduction of AMI meters in the Westar service territory. The TOU pilot participation languished between 30 and 50 customers for several years. At the start of the test year, the number of customers was 64; but that number rose to 101 by the end of the test year. From the end of the test year to the end of June 2023, another 70 were added to the TOU pilot rate.

Performance of Evergy's TOU Pilot in EKM Service Territory

Q. How does Evergy evaluate the performance of the TOU pilot in the EKM service territory?

A. The TOU pilot is working. "[T]he initial TOU rates have met or exceeded enrollment goals, reduced system coincident peak demand; and aligned pricing structure with cost causation."[17]

[16] Winslow Direct, p. 6.
[17] Evergy Direct Testimony Prepared by Bradley Lutz, Docket 23-EKCE-775-RTS (Lutz Direct), p. 16.

Q. Does Staff agree with Evergy's evaluation?

A. Yes. The program has performed better than Staff expected, in large part because of the performance of the Westar TOU pilot. In addition to almost tripling the initial customer cap, Evergy has only spent about $1.5 million of the $2.2 million budgeted for the program. In a study for Evergy, Guidehouse, Inc. (Guidehouse) found that the TOU rate in Evergy Missouri Metro reduced energy usage during the peak hours and reduced average summer coincidental peak demand by 0.31 kW and 0.12 kW in Evergy Missouri West.[18] The Guidehouse report, attached to Company Witness Winslow's testimony, describes the impact on customer bills, energy usage, comfort, and customer satisfaction.

Q. Was there anything missing from the report?

A. I was not able to find a benefit-cost analysis of the pilot in the report.

Q. Is the lack of the benefit-cost analysis a major problem?

A. No, for three of reasons. First, the costs can be limited to a finite period while the benefits should accrue over a much longer period than the pilot. For this reason, a benefit-cost analysis for this type of pilot is difficult. Second, there seems to be spillovers from the EKM pilot on the participation rate for the EKC TOU rate. Third, program participation has exceed Staff's expectations with the marketing and educational costs less than 70% of the initial budget.

[18] Winslow Direct, p. 8.

Evergy's Requested Changes to the TOU Rate Designs in EKM and EKC

Q. Does Evergy want to change anything about the TOU Pilot other than making the rate permanent?

A. Yes. Evergy wants to align the TOU rates in EKM and EKC in four different dimensions—seasonal periods, peak times of the day, TOU period structure, and the TOU energy rates. The alignment of seasonal periods was discussed earlier and carries though with the TOU rate—use the EKC seasonal definitions of summer as June through September and winter as October through May.

Evergy wants to make the peak times of the day to be 4:00 to 8:00 pm for both EKM and EKC. Currently, summer peak in EKC is 1:00 to 8:00 pm and winter peak is 10:00 am to 8:00 pm while EKM is 4:00 to 8:00 pm. The present TOU rate in EKC has three periods in the summer and two in the winter while the EKM's TOU rate has three periods during both seasons. Finally, the EKC TOU energy charges have a much smaller differential between the peak periods and the off-peak periods. For the EKC TOU rate, the difference in energy charges between the peak rate and the lowest off-peak rate is slightly more than 2:1 while in EKM the difference is 6:1. Evergy wants to move to a ratio of 7:1 in both service territories.

Standardizing 4:00 to 8:00 PM as the Peak Period

Q. Why does Evergy want to change the peak period to 4:00 to 8:00 pm?

A. Evergy hired Brattle to analyze the TOU rates in EKM and EKC and make recommendations for change. Brattle found that the optimal TOU rate for Evergy Kansas was 3:00 to 7:00 pm. However, residential customers tend to peak later than the system peak, and for both EKM and EKC residential customers 4:00 to

8:00 pm is the optimal peak.[19] In addition, Brattle mentions three other reasons why the 4:00 to 8:00 pm peak period may be preferable: increases in solar energy will probably push the peak later as it has in California, 4:00 to 8:00 provides consistency between Missouri and Kansas jurisdictions, and since Evergy has used the slogan "wait till eight" in its marketing campaign, any change could cause confusion.[20]

Q. Does Staff agree with the switching of the peaking period to a standard 4:00 to 8:00 pm?

A. Yes. For the summer, the 4:00 to 8:00 pm peaking period makes sense. A standard peaking period avoids confusion. And the evidence from California and other places of solar deployment shifting the peak period later is convincing. However, there could be a problem with using 4:00 to 8:00 pm as the winter peaking period in the future. EKC has had winter months, such as December or January, where the monthly peak occurred in the morning. If solar deployment continues to grow, electric vehicles become more ubiquitous, and switching to heating electrification takes hold; Evergy could become a winter peaking utility with its winter peaks in the early morning before the sun rises. In that case, cost causation suggests changing the peaking hours in the winter. This has not happened yet and it may never happen, but this one of those contingencies that should be considered for the future.

[19] Lutz Direct Exhibit BDL-2, Brattle, *Residential Rate Benchmarking and Market Research,* p. 10. The graphs are in Lutz's direct testimony (p. 20) but because the graphs in the Brattle report are in landscape, it is easier to see the peaks are between 4:00 and 8:00 pm for residential customers.
[20] *Id*, p. 3.

Standardizing Three-Period TOU Rate in both Summer and Winter

Q. Why does Evergy want a standardized three-period TOU rate in both EKM and EKC?

A. Kansas Metro, Missouri Metro, and Missouri West all have three-period TOU rates in the summer and winter. In addition, the three-period rate is the most used form for a TOU rate design.

Q. Does Staff agree with the three-period summer and winter TOU rate?

A. The three-period TOU rate certainly makes sense in the summer. For the winter period at the present time, there is not much to recommend either two or three-period rates. But standardization has its value, and in this case it seems enough of a reason to have a three-period TOU in the both the summer and winter.

Differential Between Peak Rate and the Lowest Off-Peak Rate

Q. What rate design does Evergy offer for the TOU rates?

A. Table 1 below is a copy of a table in Evergy Witness Bradley D. Lutz's testimony that shows the proposed TOU rates in EKM and EKC. Notice the dramatic difference between the super off-peak rate and the peak rate. For EKM, the difference is slightly more than 25 cents, and for EKC, the difference is slightly more than 22.5 cents.

Table 1

	EKC – 3 Period TOU	EKM – 3 Period TOU
Customer Charge	$16.71	$16.71
Energy Charge (per kWh)	Winter Peak: $0.23359 Off-Peak: $0.06674 Super Off-Peak: $0.03337 Summer Peak: $0.26268 Off-Peak: $0.07505 Super Off-Peak: $0.03753	Winter Peak: $0.21978 Off-Peak: $0.06279 Super Off-Peak: $0.03140 Summer Peak: $0.29270 Off-Peak: $0.008363 Super Off-Peak: $0.004181
Period Design	All Seasons Peak = 4 to 8 pm on non-holiday weekdays Super off-peak = midnight to 6 am on all days. Off-peak = all other hours	

Q. What is the differential that Evergy is proposing?

A. The difference between the super off-peak and the peak period is 7:1. The difference between the off-peak and the super off-peak is 2:1. This is referred to as a 1:2:7 TOU rate design.

Q. Why is Evergy increasing the differential in EKM from 6:1 to 7:1?

A. Evergy believes the 7:1 offers TOU rate customers a greater opportunity to save money.

Q. Does Staff have any disagreement with Evergy's proposed 7:1 differential?

A. Staff wonders why it is the only TOU rate differential Evergy is offering.

Q. Why does Staff think Evergy should offer additional TOU rates with different differentials?

A. Lutz states several times that Evergy is committed to expanding customer participation in TOU rates. But TOU rates are a hard sell. For example, Brattle's

first two sentences in its "Summary of findings and insights" are: "Despite widespread availability across most states, enrollment in TOU rates is still very low nationwide. Only a few utilities have substantial (i.e., >10%) participation in TOU rates."[21] Without the extensive marketing and education the Evergy undertook in EKM, the TOU rate in EKC languished between 30 and 50 customers for years. Evergy spent $1.5 million in marketing for about 3,000 customers—that is $500 per customer. EKM at present has 54,267 customer on the Average Pay rate. That is a rate that is designed to aid customer budgeting with the added advantage that customers don't have to worry about price signals.[22]

The above paragraph is not intended to be an argument against TOU rates, but an argument that a more gradual approach might be more effective. EKM has probably already gotten most of the easy early adapters for its TOU rate. Instead of making the differential in the TOU higher by moving from a 6:1 to a 7:1 in EKM and from a little more than 2:1 to 7:1 in EKC, Staff suggests a more moderate approach, which is to Why not have a TOU rate with a difference somewhere between 2:1 and 3:1 for those customer that might want to try but are scared off by a summer peak between 25 and 30 cents per kWh.

[21] *Id*., p. 1.
[22] Staff Data Request 159. EKC has 147,561 customers on the Average Pay rate. Both EKM and EKC have slightly less than a quarter of their customers on Average Pay.

Recommendation

Q. Please summarize your recommendation regarding TOU rates.

A. Staff is suggesting two TOU rates, one moderate and one more extreme. The more moderate rate would have a differential somewhere between 2:1 and 3:1; while the more extreme could be 6:1 as it is now or 7:1 as Evergy is proposing.

Q. Is that Staff's recommendation?

A. Yes. Staff recommends two TOU rates, one moderate and one more extreme. There is no doubt that TOU rates help send appropriate price signals to customers. But Staff does not want to limit TOU rates to only those customers who will try a high-differential rate structure.

Rate Design

Q. What is rate design?

A. Rate design is both a process and the end result of the process. That is, the rate design process results in the rate design—the specific rates for customer groups.

Q. What is the rate design process?

A. The rate design process involves two major steps. The first step is the allocation of the revenue requirement to the customer class such as the Residential class. The second step is to establish rates in each of the customer classes that allow the utility to recover its approved revenue requirement.

Q. What are the essential requirements for developing a rate design?

A. Billing determinants and the CCOS study are the two essential requirements for rate design development.

Billing Determinants

Q. Please explain what billing determinants are and why they are important in a rate case.

A. Billing determinants consist of all the data needed to generate existing and proposed revenues. They include the number of customers, demand, and annual volumes used by rate block, along with the tariff rates necessary to generate existing and proposed revenues. Billing determinants are essential for constructing a proof of revenue, which (1) demonstrates that the company's revenue requirement can be recovered, and (2) provides a comparison of existing rates and proposed rates.

Q. Are Staff's and Evergy's Billing Determinants the same?

A. No. Staff's and Evergy's billing determinants differ because of differences in the results of weather normalization and customer annualization. In addition Staff updated the customer count through June 2023 to account for customer growth after the test year. For Staff's explanation of our weather normalization and customer annualization processes, see the testimony of Staff Witness Lana Ellis. For Staff's explanation of the updating of the customer count, see the testimony of Staff Witness Justin Grady.

Class Cost of Service

Q. What does a Class Cost of Service study do?

A. A Class Cost of Service (CCOS) study allocates to a utility's customers the costs incurred in providing electricity to those same customers. Since electric rates are set for classes of customers, the CCOS study allocates the cost of service to particular rate classes. The CCOS study broadly informs the rate analyst how much it costs to serve each class. Thus, using a CCOS study as a starting point and guide

for class allocation of the revenue requirement ensures the rate analyst is beginning the rate design process by employing the principle of cost causation.

The link between the CCOS and cost causation is the strength of using a CCOS study for revenue allocation. However, CCOS studies do have limitations. First, CCOS studies are an art; they are not a science—a substantial number of subjective judgments must go into the production of any CCOS study. Second, because all CCOS studies are based on allocation mechanisms that are approximations of structural relationships, the CCOS studies must, themselves, be viewed as approximations. Third, the approximations of the structural relationships are not based on statistical theory (for the most part) so determining a confidence interval using statistical techniques is not possible. Further, because of the size and complexity, only crude sensitivity analysis is possible. Therefore, it is difficult to get a handle on the accuracy of the approximation using sensitivity analysis. Thus, we are left knowing that the cost allocation from a CCOS study is an approximation, but we cannot know precisely the numerical bounds of the approximation. Fourth, a CCOS study is a static snapshot of a dynamic process. Over time, the structural cost relationships have changed and are expected to change in the future. Thus, a rate analyst should be cautious when using a CCOS study to help determine class revenue allocations.

Q. Did Staff provide CCOSs for EKM and EKC in this Docket?

A. Yes. Staff Witness Kristina Luke-Fry sponsors Staff CCOS studies for EKM and EKC in her Direct Testimony.

Allocation of the Revenue Requirement to Base Rates

Q. What are Staff's recommended changes the EKM and EKC's revenue requirement?

A. Staff is recommending a $42,274,032 decline in EKM's revenue requirement and a $109,524,552 increase in EKC's revenue requirement.

Q. How were the changes in revenue requirement allocated?

A. Table 2 has the allocation of revenue requirement for EKM and Table 3 has the allocation of revenue requirement for EKC.

Table 2

Allocation of the Decline in Revenue Requirement Among Evergy Metro's Customer Classes

	Revenue with Current Rates $	Relative Rate of Return	Equal Rate Decrease in Class Revenue	Actual Decrease in Class Revenue	Class Share of Increase in Revenue	Total Revenue (1) + (3)	Share of Total Revenue
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Residential	$ 293,201,380	1.08	$ (21,006,981)	$ (21,022,539)	49.7%	$ 272,178,841	49.7%
Residential DG	$ 1,638,923	2.13	$ (117,424)	$ (139,308)	0.3%	$ 1,499,614	0.3%
Small General Service	$ 55,802,172	(0.81)	$ (3,998,055)	$ (3,627,141)	8.6%	$ 52,175,031	9.5%
Medium General Service	$ 66,502,780	1.49	$ (4,764,721)	$ (5,074,831)	12.0%	$ 61,427,950	11.2%
Large General Service	$ 167,783,733	1.15	$ (12,021,191)	$ (12,030,094)	28.5%	$ 155,753,640	28.4%
Large Power Service	$ -		$ -	$ -		$ -	0.0%
Business EV Service	$ 122,397	(0.93)	$ (8,769)	$ -	0.0%	$ 122,397	0.0%
Lighting Service	$ 4,981,245	1.45	$ (356,891)	$ (380,119)	0.9%	$ 4,601,126	0.8%
TOTAL	$ 590,032,630	1.00	$ (42,274,032)	$ (42,274,032)	100.0%	$ 547,758,598	100.0%

Table 3

Allocation of the Decline in Revenue Requirement Among Evergy Central's Customer Classes

	Revenue with Current Rates $	Relative Rate of Return	Equal Rate Increase in Class Revenue	Actual Increase in Class Revenue	Class Share of Increase in Revenue	Total Allocated Revenue $	Share of Total Allocated Revenue
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Residential	$ 575,948,427	0.88	$ 51,050,313	52,609,789	48.0%	$ 628,558,216	46.7%
Residential DG	$ 2,541,215	1.93	$ 225,246	233,949	0.2%	$ 2,699,434	0.2%
Small General Service	$ 230,838,248	1.70	$ 20,460,799	19,044,155	17.4%	$ 249,882,403	18.6%
Medium General Service	$ 141,393,260	1.65	$ 12,532,667	11,664,944	10.7%	$ 153,058,204	11.4%
Schools Services	$ 32,015,241	0.58	$ 2,837,733	3,073,463	2.8%	$ 35,088,704	2.6%
Church Service	$ 1,100,139	0.58	$ 97,513	105,613	0.1%	$ 1,205,752	0.1%
Large General Service	$ 167,783,733	1.29	$ 14,871,839	14,345,509	13.1%	$ 182,129,242	13.5%
Large Power Service	$ 21,534,962	(0.97)	$ 1,908,793	2,294,000	2.1%	$ 23,828,962	1.8%
Interruptible Service	$ 755,663	(0.97)	$ 66,980	80,497	0.1%	$ 836,160	0.1%
Large Tire Manufacturer	$ 4,487,584	(0.97)	$ 397,766	478,037	0.4%	$ 4,965,621	0.4%
Special Contracts	$ 32,290,227	(0.97)	$ 2,862,107	3,439,698	3.1%	$ 35,729,925	2.7%
Business EV Service	$ 294,338	(0.09)	$ 26,089	31,354	0.0%	$ 325,692	0.0%
Lighting Service	$ 24,670,382	1.37	$ 2,186,707	2,123,543	1.9%	$ 26,793,925	2.0%
TOTAL	$ 1,235,653,419	1.00	$ 109,524,552	$ 109,524,551	100.0%	$ 1,345,102,241	100.0%

Both tables have the same structure: Column (1) has the current revenue for each class generated by the current rates; Column (2) has the relative rate of return for each class from the CCOS for the appropriate service territory; Column (3) has the revenue requirement allocation if each class got the same proportion of the change in revenue requirement as that class's proportion of the total revenue generated with current rates; Column (4) has Staff's proposed change in revenue requirement allocation; Column (5) has the class percentage share of the change in revenue requirement; Column (6) is the sum of the revenue with current rates, Column (1), and the allocated increase in class revenue, Column (3); and Column (7) is the class share of total revenue, Column (6).

Q. How did you arrive at the allocation of the change in revenue requirement?

A. The first step was to calculate an equal proportional change in revenue requirement based on the proportion of current rate each class had of the total revenue. In other words, I divided the class revenue by the total revenue and multiplied that proportion times the total change in revenue requirement. The equal proportional change would represent a neutral change for a customer class. The result of this calculation is in Column (3 of Tables 2 and 3.

The second step was to go to the CCOS and get the class relative rate of returns. A change based solely on a class's relative rate of return would be the most extreme change in revenue. I used the equal proportion allocation and the relative rate of return as the lower and upper bounds to the targeted revenue requirement allocation. For EKM, the targeted change in revenue requirement represents a 7.16% decline in revenue. Thus, a decline in revenue requirement of more than 7.16% or a decline

of less than 7.16% would represent the influence of the class relative rate of return. For EKC, the targeted change in revenue requirement represents an 8.92% increase in revenue. Tables 4 and 5 below shows the decrease and the percentage decrease in class revenue requirement for EKM. In general, I moved the percentage change in revenue requirement in the direction, but not the magnitude, that the class relative rate of return indicated.

Table 4

Decrease in Class Revenue Requirement		
	Decrease in Class Revenue	Percentage Decrease in Revenue
	(1)	(2)
Residential	$ (21,022,539)	7.17%
Residential DG	$ (139,308)	8.50%
Small General Service	$ (3,627,141)	6.50%
Medium General Service	$ (5,074,831)	7.63%
Large General Service	$ (12,030,094)	7.17%
Large Power Service	$ -	
Business EV Service	$ -	
Lighting Service	$ (380,119)	7.63%
TOTAL	$ (42,274,032)	7.16%

Table 5

Increase in Class Revenue Requirement: Central		
	Actual Increase in Class Revenue	Class Share of Increase in Revenue
	(1)	(2)
Residential	52,609,789	9.25%
Residential DG	233,949	9.25%
Small General Service	19,044,155	8.25%
Medium General Service	11,664,944	8.25%
Schools Services	3,073,463	9.60%
Church Service	105,613	9.60%
Large General Service	14,345,509	8.55%
Large Power Service	2,294,000	10.65%
Interruptible Service	80,497	10.65%
Large Tire Manufacturer	478,037	10.65%
Special Contracts	3,439,698	10.65%
Business EV Service	31,354	10.65%
Lighting Service	2,123,543	8.61%
TOTAL	$ 109,524,551	8.92%

Q. Were you able to design rates to collect the revenue allocation targets?

A. Due to rounding of rates, it is not possible to design rates that exactly recover the t revenue target. Tables 6 and 7 illustrate the target and actual revenue for EKM and EKC respectively.

Table 6

Difference Between Target and Actual Revenue: Metro	Revenue with Current Rates $	Proposed Decrease in Class Revenue	Actual Decrease in Class Revenue	Difference Between Proposed & Actual
	(1)	(2)	(3)	(4)
Residential & RS-DG	$ 294,840,303	$ (21,161,847)	$ (21,161,631)	$ 273,678,455
Small General Service	$ 55,802,172	$ (3,627,141)	$ (3,626,707)	$ 52,175,031
Medium General Service	$ 66,502,780	$ (5,074,831)	$ (5,074,650)	$ 61,427,950
Large General Service	$ 167,783,733	$ (12,030,094)	$ (12,023,467)	$ 155,753,640
Large Power Service	$ -	$ -		$ -
Business EV Service	$ 129,983	$ -	$ 3	$ 129,986
Lighting Service	$ 4,981,245	$ (380,119)	$ (380,263)	$ 4,601,126
TOTAL	$ 590,040,216	$ (42,274,032)	$ (42,266,715)	$ 547,766,187

Table 7

Difference Between Target and Actual Revenue: Central	Revenue with Current Rates $	Proposed Decrease in Class Revenue	Actual Decrease in Class Revenue	Difference Between Proposed & Actual
	(1)	(2)	(3)	(4)
Residential & RS-DG	$ 578,489,642	52,843,738	$ 52,847,292	$ 3,554
Small General Service	$ 230,838,248	19,044,155	$ 19,049,016	$ 4,861
Medium General Service	$ 141,393,260	11,664,944	$ 11,664,965	$ 21
Schools Services	$ 32,015,241	3,073,463	$ 3,074,275	$ 812
Church Service	$ 1,100,139	105,613	$ 105,634	$ 21
Large General Service	$ 167,783,733	14,345,509	$ 14,346,575	$ 1,066
LPS/LTM/IC/SC	$ 59,068,436	6,292,232	$ 6,291,662	$ (570)
Business EV Service	$ 294,338	31,354	$ 31,355	$ 1
Lighting Service	$ 24,670,382	2,123,543	$ 2,124,144	$ 601
TOTAL	$ 1,235,653,419	$ 109,524,551	$ 109,534,919	$ 10,368

NOTE 1: LPS is Large Power Services, LTM is Large Tire Manufacturing, IC is Interruptible Contract Service, and SC are the Special Contracts.

Q. Were there any other issues with class allocation?

A. Yes. The allocation of the economic development rider (EDR). House Bill 2585 in the 2020 session stipulated that the economic discounts need to be distributed using a "uniform percentage adjustment to the revenue requirement for all customer classes[.]" Thus, the EDR needs to be allocated to all customer classes based on the percentage of total revenue each class has. Then the rest of the revenue requirement is allocated to the customer classes using the CCOS study as a guide. Tables 8 and 9 below show the allocation of the EDR and the resulting allocation of the rest of the revenue requirement respectively.

Table 8

EDR Allocation with Revenue Requirement Allocation: Metro	Total Allocated Revenue $	Allocation of EDR Among Classes	Allocated Increase in Class Revenue	Non-EDR Share of Total Allocated Revenue
	(8)	(2)	(3)	(4)
Residential	$ 293,201,380	$ 662,410	$ (21,022,539)	$ (21,684,949)
Residential DG	$ 1,638,923	$ 3,703	$ (139,308)	$ (143,011)
Small General Service	$ 55,802,172	$ 126,070	$ (3,627,141)	$ (3,753,211)
Medium General Service	$ 66,502,780	$ 150,245	$ (5,074,831)	$ (5,225,076)
Large General Service	$ 167,783,733	$ 379,063	$ (12,030,094)	$ (12,409,156)
Large Power Service	$ -	$ -	$ -	$ -
Business EV Service	$ 122,397	$ 277	$ -	$ (277)
Lighting Service	$ 4,981,245	$ 11,254	$ (380,119)	$ (391,373)
		$ -		
TOTAL	$ 590,032,630	$ 1,333,021	$(42,274,032.00)	$ (43,607,053)

Table 9

Allocation of the Increase in Revenue Requirement Among Customer Classes	Total Allocated Revenue $	Allocation of EDR Among Classes	Allocated Increase in Class Revenue	Non-EDR Share of Total Allocated Revenue
	(8)	(2)	(3)	(4)
Residential	$ 575,948,427	$ 236,030	$ 52,609,789	$ 52,373,759
Residential DG	$ 2,541,215	$ 1,041	$ 233,949	$ 232,908
Small General Service	$ 230,838,248	$ 94,600	$ 19,044,155	$ 18,949,555
Medium General Service	$ 141,393,260	$ 57,944	$ 11,664,944	$ 11,607,000
Schools Services	$ 32,015,241	$ 13,120	$ 3,073,463	$ 3,060,343
Church Service	$ 1,100,139	$ 451	$ 105,613	$ 105,162
Large General Service	$ 167,783,733	$ 68,760	$ 14,345,509	$ 14,276,749
Large Power Service	$ 21,534,962	$ 8,825	$ 2,294,000	$ 2,285,175
Interruptible Service	$ 755,663	$ 310	$ 80,497	$ 80,187
Large Tire Manufacturer	$ 4,487,584	$ 1,839	$ 478,037	$ 476,198
Special Contracts	$ 32,290,227	$ 13,233	$ 3,439,698	$ 3,426,465
Business EV Service	$ 294,338	$ 121	$ 31,354	$ 31,233
Lighting Service	$ 24,670,382	$ 10,110	$ 2,123,543	$ 2,113,433
TOTAL	$ 1,235,653,419	$ 506,384	$ 109,524,551	$ 109,018,167

NOTE 1: LGS is Large General Service, I&LP is Industrial & Large Power, LTM is Large Tire Manufacturing, IC is Interruptible Contract Service, and SC are the Special Contracts.

Rates for Customers

Q. How were rates for the customers in the different customer classes determined?

A. The EKM rates were determined by multiplying the different demand and energy charges by the fixed percentage necessary to reduce the class revenue requirement the allocated amount. The customer charge was unchanged in all classes.

The EKC rates were determined in a similar fashion except that the customer charge was raised slightly for the commercial and industrial customers. For example, if the customer charge was $29, then it was raised to $30. The rest of the

increased revenue came from raising the demand and energy charges the same proportion.

Q. Why did you place nearly all of the revenue requirement changes in the variable charges and not the customer charge?

A. By not changing the EKM customer charge, I am essentially increasing the customer charge relative to the decline in the demand and energy charges, but only moderately. A large part of the increase in revenue requirement in EKC was due to the offsetting of the retail energy cost adjustment (RECA) and the rebasing of the property tax surcharge (PTS). Both of these are collected based on kWh, thus collecting the largest part of the revenue requirement increase in EKC from the variable charges followed naturally from the source of the increase.

The rate designs for the rate codes with different rate designs are provided as exhibits to this testimony. The rate designs for EKM are in Exhibit-RHG-1 and the rate designs for EKC are in Exhibit-RHG-2.

Bill Impact of Rate Changes on Residential Customers

Q. Have you calculated the bill impact of the decline in revenue requirement in EKM and the increase in revenue requirement in EKC?

A. Yes. Table 10 has the impact on residential customers for EKM and Table 11 has the bill impact on residential customers for EKC.

Table 10

Residential General Use							
Elecric Usage in kWh		600	900	1500	2000	3000	
Current Rates							
Basic Service Fee	$ 14.25	$ 14.25	$ 14.25	$ 14.25	$ 14.25	$ 14.25	
Winter Energy							
1st block - 900 kWh	$ 0.081010	$ 48.61	$ 72.91	$ 72.91	$ 72.91	$ 72.91	
2nd block - additional kWh	$ 0.081010	$ -	$ -	$ 48.61	$ 89.11	$ 170.12	
Summer Energy							
1st block - 900 kWh	$ 0.104940	$ 62.96	$ 94.45	$ 94.45	$ 94.45	$ 94.45	
2nd block - additional kWh	$ 0.104940	$ -	$ -	$ 62.96	$ 115.43	$ 220.37	
Riders							
PTS	$ 0.001720	$ 1.03	$ 1.55	$ 2.58	$ 3.44	$ 5.16	
TDC	$ 0.008350	$ 5.01	$ 7.52	$ 12.53	$ 16.70	$ 25.05	
EER	$ 0.000400	$ 0.24	$ 0.36	$ 0.60	$ 0.80	$ 1.20	
ECA	$ 0.015020	$ 9.01	$ 13.52	$ 22.53	$ 30.04	$ 45.06	
New Rates							
Basic Service Fee	$ 14.25	$ 14.25	$ 14.25	$ 14.25	$ 14.25	$ 14.25	
Winter Energy							
1st block - 900 kWh	$ 0.074257	$ 44.55	$ 66.83	$ 66.83	$ 66.83	$ 66.83	
2nd block - additional kWh	$ 0.074257	$ -	$ -	$ 44.55	$ 81.68	$ 155.94	
Summer Energy							
1st block - 900 kWh	$ 0.096192	$ 57.72	$ 86.57	$ 86.57	$ 86.57	$ 86.57	
2nd block - additional kWh	$ 0.096192	$ -	$ -	$ 57.72	$ 105.81	$ 202.00	
Riders							
PTS	$ -	$ -	$ -	$ -	$ -	$ -	
TDC	$ 0.008350	$ 5.01	$ 7.52	$ 12.53	$ 16.70	$ 25.05	
EER	$ 0.000400	$ 0.24	$ 0.36	$ 0.60	$ 0.80	$ 1.20	
RECA	$ 0.015020	$ 9.01	$ 13.52	$ 22.53	$ 30.04	$ 45.06	
Bill Impacts of Current and Proposed Rates							
Winter Bill—Current Rates		$ 77.12	$ 108.55	$ 171.42	$ 223.81	$ 328.59	
Winter Bill—Proposed Rates		$ 73.07	$ 102.47	$ 161.29	$ 210.30	$ 308.33	
Percentage Decrease		-5.3%	-5.6%	-5.9%	-6.0%	-6.2%	
Summer Bill—Current Rates		$ 91.48	$ 130.09	$ 207.32	$ 271.67	$ 400.38	
Summer Bill—Proposed Rates		$ 86.23	$ 122.22	$ 194.19	$ 254.17	$ 374.14	
Percentage Decrease		-5.7%	-6.1%	-6.3%	-6.4%	-6.6%	
NOTE: The Riders are: PTS = Property Tax Surcharge, TDC = Transmission Delivery Charge, EER = Energy Efficiency Rider, and ECA = Energy Cost Adjustment							

Table 11

Residential Standard Service							
Elecric Usage in kWh		600	900	1500	2000	3000	
Current Rates							
Basic Service Fee	$ 14.50	$ 14.50	$ 14.50	$ 14.50	$ 14.50	$ 14.50	
Winter Energy							
1st block - 900 kWh	$ 0.071987	$ 43.19	$ 64.79	$ 64.79	$ 64.79	$ 64.79	
2nd block - additional kWh	$ 0.058841	$ -	$ -	$ 35.30	$ 64.73	$ 123.57	
Summer Energy							
1st block - 900 kWh	$ 0.071987	$ 43.19	$ 64.79	$ 64.79	$ 64.79	$ 64.79	
2nd block - additional kWh	$ 0.079405	$ -	$ -	$ 47.64	$ 87.35	$ 166.75	
Riders							
PTS	$ 0.000169	$ 0.10	$ 0.15	$ 0.25	$ 0.34	$ 0.51	
TDC	$ 0.017412	$ 10.45	$ 15.67	$ 26.12	$ 34.82	$ 52.24	
EER	$ 0.000211	$ 0.13	$ 0.19	$ 0.32	$ 0.42	$ 0.63	
RECA	$ 0.025034	$ 15.02	$ 22.53	$ 37.55	$ 50.07	$ 75.10	
New Rates							
Basic Service Fee	$ 14.50	$ 14.50	$ 14.50	$ 14.50	$ 14.50	$ 14.50	
Winter Energy							
1st block - 900 kWh	$ 0.080091	$ 48.05	$ 72.08	$ 72.08	$ 72.08	$ 72.08	
2nd block - additional kWh	$ 0.065465	$ -	$ -	$ 39.28	$ 72.01	$ 137.48	
Summer Energy							
1st block - 900 kWh	$ 0.080091	$ 48.05	$ 72.08	$ 72.08	$ 72.08	$ 72.08	
2nd block - additional kWh	$ 0.088344	$ -	$ -	$ 53.01	$ 97.18	$ 185.52	
Riders							
PTS	$ -	$ -	$ -	$ -	$ -	$ -	
TDC	$ 0.017412	$ 10.45	$ 15.67	$ 26.12	$ 34.82	$ 52.24	
EER	$ 0.000211	$ 0.13	$ 0.19	$ 0.32	$ 0.42	$ 0.63	
RECA	$ 0.025034	$ 15.02	$ 22.53	$ 37.55	$ 50.07	$ 75.10	
Bill Impacts of Current and Proposed Rates							
Winter Bill—Current Rates		$ 83.29	$ 117.68	$ 178.58	$ 229.33	$ 330.83	
Winter Bill—Proposed Rates		$ 88.15	$ 124.97	$ 189.85	$ 243.91	$ 352.03	
Percentage Increase		5.8%	6.2%	6.3%	6.4%	6.4%	
Summer Bill—Current Rates		$ 83.29	$ 117.68	$ 190.92	$ 251.95	$ 374.01	
Summer Bill—Proposed Rates		$ 88.15	$ 124.97	$ 203.57	$ 269.07	$ 400.07	
Percentage Increase		5.8%	6.2%	6.6%	6.8%	7.0%	
NOTE 1: I have included Residential Conservation Service and Residential Multi-Dwelling Service in the Residential Standard Service since all of these subclasses have the same rates.							
NOTE 2: The Riders are: PTS = Property Tax Surcharge, TDC = Transmission Delivery Charge, EER = Energy Efficiency Rider, and RECA = Retail Energy Cost Adjustment							

Recommendation

Q. What is your recommendation regarding rate design?

A. I recommend the Commission accept Staff's rate design.

IV. CONCLUSION

Q. Please summarize the recommendations discussed in your testimony.

A. I recommend the Commission approve a modified TOU rate, eliminate certain rates, and accept Staff's rate design.

Q. Does this conclude your testimony?

A. Yes. Thank you.

EXHIBIT RHG-1
DOCKET NO. 23-EKCE-775-RTS

Residential Time of Use					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	33,950	$ 14.25	$ 483,785	$ 14.25	$ 483,785
Energy kWh					
Winter					
Off Peak	13,622,994	$ 0.073837	$ 1,005,875	$ 0.06768	$ 922,004
On Peak	5,121,238	$ 0.188406	$ 964,872	$ 0.17270	$ 884,438
Super Off Peak	2,651,927	$ 0.031099	$ 82,473	$ 0.02851	$ 75,606
Total Winter	21,396,158		$ 2,053,220		$ 1,882,048
Summer					
Off Peak	10,444,355	$ 0.084203	$ 879,448	$ 0.07718	$ 806,095
On Peak	3,643,263	$ 0.252610	$ 920,323	$ 0.23155	$ 843,598
Super Off Peak	2,287,164	$ 0.042102	$ 96,293	$ 0.03859	$ 88,262
Total Summer	16,374,783		$ 1,896,065		$ 1,737,955
Total Energy and Revenue	37,770,941		$ 4,433,069		$ 4,103,788

Residential Other Use					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	6,671	$ 14.25	$ 95,055	$ 14.25	$ 95,055
Energy kWh					
Winter	1,688,695	$ 0.048606	$ 82,081	$ 0.04455	$ 75,231
Summer	648,464	$ 0.048606	$ 31,519	$ 0.04455	$ 28,889
Total Energy and Revenue	2,337,159		$ 208,655		$ 199,175

Residential Demand					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	1,965	$ 14.25	$ 28,000	$ 14.25	$ 28,000
Demand kW					
Winter	5,881	$ 11.500000	$ 67,627	$ 10.54134	$ 61,990
Summer	4,593	$ 14.000000	$ 64,305	$ 12.83293	$ 58,945
Total Demand	10,474		$ 131,932		$ 120,934
Energy kWh					
Winter	1,305,420	$ 0.043681	$ 57,022	$ 0.04004	$ 52,269
Summer	1,305,420	$ 0.043681	$ 57,022	$ 0.04004	$ 52,269
Total Energy	2,610,840		$ 114,044		$ 104,538
Total Energy and Revenue	2,610,840		$ 273,976		$ 253,472

Residential Space Heating Separate Meter					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	139,007	$ 14.25	$ 1,980,846	$ 14.25	$ 1,980,846
Total Energy					
Winter					
Off Peak	45,660,348	$ 0.072950	$ 3,330,922	$ 0.06687	$ 3,053,308
On Peak	6,141,785	$ 0.064150	$ 393,995	$ 0.05880	$ 361,137
Separate Heat	70,809,386	$ 0.064120	$ 4,540,298	$ 0.05877	$ 4,161,468
Total Winter	122,611,519		$ 8,265,216		$ 7,575,912
Summer					
Off Peak	33,222,264	$ 0.104940	$ 3,486,344	$ 0.09619	$ 3,195,650
On Peak	14,736,992	$ 0.104940	$ 1,546,500	$ 0.09619	$ 1,417,551
Total Summer	47,959,257		$ 5,032,844		$ 4,613,201
Total Energy	170,570,776		$ 15,278,906		$ 14,169,959

Residential General Use					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	1,908,435	$ 14.25	$ 27,195,193	$ 14.25	$ 27,195,193
Energy kWh					
Winter					
Off Peak	839,514,046	$ 0.081010	$ 68,009,033	$ 0.07426	$ 62,342,313
On Peak	164,837,757	$ 0.081010	$ 13,353,507	$ 0.07426	$ 12,240,852
Total Winter	1,004,351,803		$ 81,362,540		$ 74,583,165
Summer					
Off Peak	527,344,051	$ 0.104940	$ 55,339,485	$ 0.09619	$ 50,725,224
On Peak	308,674,530	$ 0.104940	$ 32,392,305	$ 0.09619	$ 29,691,403
Total Summer	836,018,581		$ 87,731,790		$ 80,416,627
Total Energy and Revenue	1,840,370,384		$ 196,289,523		$ 182,194,986

Residential Space Heating: One Meter					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	33,950	$ 14.25	$ 483,785	$ 14.25	$ 483,785
Energy kWh					
Winter					
Off Peak	376,892,053	$ 0.072950	$ 27,494,275	$ 0.06687	$ 25,202,772
On Peak	156,864,613	$ 0.064120	$ 10,058,159	$ 0.05877	$ 9,218,933
Total Winter	533,756,666		$ 37,552,434		$ 34,421,705
Summer					
Off Peak	183,023,648	$ 0.104940	$ 19,206,502	$ 0.09619	$ 17,605,045
On Peak	88,377,997	$ 0.104940	$ 9,274,387	$ 0.09619	$ 8,501,079
Total Summer	271,401,644		$ 28,480,889		$ 26,106,124
Total Energy and Revenue	805,158,310		$ 66,517,108		$ 61,011,614

Residential Time of Day					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	33,950	$ 19.86	$ 674,243	$ 19.86	$ 674,243
Energy kWh					
Winter					
Off Peak	233,676	$ 0.075210	$ 17,575	$ 0.06894	$ 16,110
Summer					
Off Peak	145,849	$ 0.071940	$ 10,492	$ 0.06594	$ 9,617
On Peak	45,568	$ 0.171990	$ 7,837	$ 0.15765	$ 7,184
Total Summer	191,417		$ 18,330		$ 16,801
Total Energy and Revenue	425,093		$ 710,148		$ 707,154

Total Energy and Revenue	2,859,243,502		$ 283,711,385		$ 262,640,148

RS-DG without Demand					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	11,130	$ 14.25	$ 158,609	$ 14.25	$ 158,609
Energy kWh					
Winter	5,315,707	$ 0.096270	$ 511,743	$ 0.08824	$ 469,058
Summer	2,570,740	$ 0.122510	$ 314,941	$ 0.11230	$ 288,694
Total Energy and Revenue	7,886,446		$ 985,293		$ 916,361

Residential Space Heating Separate Meter					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	250	$ 14.25	$ 3,559	$ 14.25	$ 3,559
Total Energy					
Winter					
Off Peak	49,933	$ 0.072950	$ 3,643	$ 0.06687	$ 3,339
On Peak	5,064	$ 0.064150	$ 325	$ 0.05880	$ 298
Separate Heat	180,978	$ 0.064120	$ 11,604	$ 0.05877	$ 10,636
Total Winter	235,975		$ 15,572		$ 14,273
Summer					
Off Peak	49,111	$ 0.104940	$ 5,154	$ 0.09619	$ 4,724
On Peak	14,965	$ 0.104940	$ 1,570	$ 0.09619	$ 1,439
Total Summer	64,076		$ 6,724		$ 6,164
Total Energy	300,052		$ 25,854		$ 23,995

RS-DG General Use					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	1,798	$ 14.25	$ 25,617	$ 14.25	$ 25,617
Energy kWh					
Winter					
Off Peak	505,320	$ 0.081010	$ 40,936	$ 0.07426	$ 37,525
On Peak	238,212	$ 0.081010	$ 19,298	$ 0.07426	$ 17,690
Total Winter	743,532		$ 60,234		$ 55,215
Summer					
Off Peak	339,374	$ 0.104940	$ 35,614	$ 0.09619	$ 32,644
On Peak	180,515	$ 0.104940	$ 18,943	$ 0.09619	$ 17,364
Total Summer	519,888		$ 54,557		$ 50,008
Total Energy and Revenue	1,263,420		$ 140,408		$ 130,840

RS-DG Space Heating: One Meter					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	25,756	$ 14.25	$ 367,028	$ 14.25	$ 367,028
Energy kWh					
Winter					
Off Peak	593,505	$ 0.072950	$ 43,296	$ 0.06687	$ 39,688
On Peak	539,384	$ 0.064120	$ 34,585	$ 0.05877	$ 31,700
Total Winter	1,132,889		$ 77,881		$ 71,387
Summer					
Off Peak	258,969	$ 0.104940	$ 27,176	$ 0.09619	$ 24,910
On Peak	145,618	$ 0.104940	$ 15,281	$ 0.09619	$ 14,007
Total Summer	404,587		$ 42,457		$ 38,917
Total Energy and Revenue	1,537,476		$ 487,367		$ 477,332

SGS: Secondary with Second Meter					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	1,041	$ 18.14	$ 18,891	$ 18.14	$ 18,891
Summer Block 2	513	$ 18.14	$ 9,308	$ 18.14	$ 9,308
Summer Block 3	0	$ 47.41	$ -	$ 47.41	
Summer Block 4	0	$ 47.41	$ -	$ 47.41	
Winter Block 1	2,042	$ 47.41	$ 96,799	$ 47.41	$ 96,799
Winter Block 2	1,027	$ 47.41	$ 48,687	$ 47.41	$ 48,687
Winter Block 3	0	$ 47.41	$ -	$ 47.41	
Winter Block 4	0	$ 47.41	$ -	$ 47.41	
Other Meter Summer	1,555	$ 2.14	$ 3,327	$ 2.14	$ 3,327
Other Meter Winter	3,069	$ 2.14	$ 6,567	$ 2.14	$ 6,567
Total Customer Charge	9,246		$ 183,579		$ 183,579
Facilities Charge					
Summer Block 1	26,282		$ -		$ -
Summer Block 2	5,948	$ 2.794	$ 16,618	$ 2.794	$ 16,618
Winter Block 1	52,108		$ -		$ -
Winter Block 2	12,325	$ 2.794	$ 34,437	$ 2.794	$ 34,437
Total Facilities Charge	96,663		$ 51,055		$ 51,055
Demand Charge					
Summer	15,946		$ -		$ -
Winter	48,624		$ -		$ -
Total Demand Charge	64,570		$ -		$ -
Energy Charge - Summer					
First 180 Hours Use per month	2,017,259	$ 0.14004	$ 282,497	$ 0.14004	$ 282,497
Next 180 Hours Use per month	486,048	$ 0.06150	$ 29,892	$ 0.06150	$ 29,892
Over 360 Hours Use per month	44,489	$ 0.05495	$ 2,445	$ 0.05495	$ 2,445
Energy Charge - Winter					
First 180 Hours Use per month	2,265,827	$ 0.11146	$ 252,549	$ 0.11146	$ 252,549
Next 180 Hours Use per month	487,953	$ 0.05254	$ 25,637	$ 0.05254	$ 25,637
Over 360 Hours Use per month	56,251	$ 0.04143	$ 2,330	$ 0.04143	$ 2,330
Second Meter Heating	4,174,278	$ 0.04018	$ 167,722	$ 0.04018	$ 167,722
Total Energy Charge	9,532,105		$ 763,073		$ 763,073
Reactive Demand Adj	511	$ 0.645	$ 330	$ 0.645	$ 330
Total Energy and Revenue	43,379,883		$ 998,036		$ 998,036

SGA: Primary					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	2	$ 18.14	$ 37	$ 18.14	$ 37
Summer Block 2	8	$ 18.14	$ 142	$ 18.14	$ 142
Summer Block 3	16	$ 47.41	$ 752	$ 47.41	
Summer Block 4	4	$ 47.41	$ 195	$ 47.41	
Winter Block 1	1	$ 47.41	$ 70	$ 47.41	$ 70
Winter Block 2	14	$ 47.41	$ 641	$ 47.41	$ 641
Winter Block 3	30	$ 47.41	$ 1,406	$ 47.41	
Winter Block 4	8	$ 47.41	$ 378	$ 47.41	
Total Customer Charge	82		$ 3,620		$ 890
Facilities Charge					
Summer Block 1	714		$ -		$ -
Summer Block 2	14,818	$ 2.364	$ 35,029	$ 2.364	$ 35,029
Winter Block 1	1,322		$ -		$ -
Winter Block 2	26,354	$ 2.364	$ 62,301	$ 2.364	$ 62,301
Total Facilities Charge	43,207		$ 97,330		$ 97,330
Demand Charge					
Summer	13,953		$ -		$ -
Winter	17,810		$ -		$ -
Total Demand Charge	31,764		$ -		$ -
Energy Charge - Summer					
First 180 Hours Use per month	1,068,595	$ 0.14004	$ 149,646	$ 0.14004	$ 149,646
Next 180 Hours Use per month	234	$ 0.06150	$ 14	$ 0.06150	$ 14
Over 360 Hours Use per month	0	$ 0.05495	$ -	$ 0.05495	$ -
Energy Charge - Winter					
First 180 Hours Use per month	1,300,919	$ 0.07579	$ 98,597	$ 0.07579	$ 98,597
Next 180 Hours Use per month	3,567	$ 0.04599	$ 164	$ 0.04599	$ 164
Over 360 Hours Use per month	0	$ 0.04018	$ -	$ 0.04018	$ -
Total Energy Charge	2,373,316		$ 248,421		$ 248,421
Reactive Demand Adj	612	$ 0.645	$ 395	$ 0.645	$ 395
Total Energy and Revenue	2,373,316		$ 349,766		$ 347,036

SGA: Secondary					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	4,702	$ 18.14	$ 85,293	$ 18.14	$ 85,293
Summer Block 2	664	$ 18.14	$ 12,044	$ 18.14	$ 12,044
Summer Block 3	40	$ 47.41	$ 1,880	$ 47.41	
Summer Block 4	4	$ 47.41	$ 196	$ 47.41	
Winter Block 1	9,237	$ 47.41	$ 437,905	$ 47.41	$ 437,905
Winter Block 2	1,333	$ 47.41	$ 63,205	$ 47.41	$ 63,205
Winter Block 3	73	$ 47.41	$ 3,457	$ 47.41	
Winter Block 4	8	$ 47.41	$ 386	$ 47.41	
Total Customer Charge	16,060		$ 604,366		$ 598,447
Facilities Charge					
Summer Block 1	48,855		$ -		$ -
Summer Block 2	27,540	$ 2.794	$ 76,947	$ 2.794	$ 76,947
Winter Block 1	97,989		$ -		$ -
Winter Block 2	56,749	$ 2.794	$ 158,556	$ 2.794	$ 158,556
Total Facilities Charge	231,133		$ 235,503		$ 235,503
Demand Charge					
Summer	41,839		$ -		$ -
Winter	106,439		$ -		$ -
Total Demand Charge	148,279		$ -		$ -
Energy Charge - Summer					
First 180 Hours Use per month	6,241,719	$ 0.14004	$ 874,090	$ 0.14004	$ 874,090
Next 180 Hours Use per month	3,528,725	$ 0.06150	$ 217,017	$ 0.06150	$ 217,017
Over 360 Hours Use per month	1,420,107	$ 0.05495	$ 78,035	$ 0.05495	$ 78,035
Energy Charge - Winter					
First 180 Hours Use per month	14,592,845	$ 0.07579	$ 1,105,992	$ 0.07579	$ 1,105,992
Next 180 Hours Use per month	6,654,114	$ 0.04599	$ 306,023	$ 0.04599	$ 306,023
Over 360 Hours Use per month	2,728,103	$ 0.04018	$ 109,615	$ 0.04018	$ 109,615
Total Energy Charge	35,165,613		$ 2,690,771		$ 2,690,771
Reactive Demand Adj	4,467	$ 0.645	$ 2,881	$ 0.645	$ 2,881
Total Energy and Revenue	35,165,613		$ 3,533,522		$ 3,527,603

SGS: Primary					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	0	$ 18.14	$ -	$ 18.14	$ -
Summer Block 2	7	$ 18.14	$ 134	$ 18.14	$ 134
Summer Block 3	0	$ 47.41	$ 18	$ 47.41	
Summer Block 4	0	$ 47.41	$ -	$ 47.41	
Winter Block 1	0	$ 47.41	$ -	$ 47.41	$ -
Winter Block 2	12	$ 47.41	$ 561	$ 47.41	$ 561
Winter Block 3	3	$ 47.41	$ 126	$ 47.41	
Winter Block 4	0	$ 47.41	$ -	$ 47.41	
Total Customer Charge	22		$ 839		$ 695
Facilities Charge					
Summer Block 1	201		$ -		$ -
Summer Block 2	435	$ 2.364	$ 1,029	$ 2.364	$ 1,029
Winter Block 1	377		$ -		$ -
Winter Block 2	1,803	$ 2.364	$ 4,263	$ 2.364	$ 4,263
Total Facilities Charge	2,817		$ 5,292		$ 5,292
Demand Charge					
Summer	572		$ -		$ -
Winter	2,034		$ -		$ -
Total Demand Charge	2,606		$ -		$ -
Energy Charge - Summer					
First 180 Hours Use per month	102,729	$ 0.13653	$ 14,026	$ 0.13653	$ 14,026
Next 180 Hours Use per month	79,214	$ 0.05981	$ 4,738	$ 0.05981	$ 4,738
Over 360 Hours Use per month	86,397	$ 0.05352	$ 4,624	$ 0.05352	$ 4,624
Energy Charge - Winter					
First 180 Hours Use per month	366,207	$ 0.10862	$ 39,777	$ 0.10862	$ 39,777
Next 180 Hours Use per month	308,514	$ 0.05124	$ 15,808	$ 0.05124	$ 15,808
Over 360 Hours Use per month	525,320	$ 0.04028	$ 21,160	$ 0.04028	$ 21,160
Total Energy Charge	1,468,381		$ 100,133		$ 100,133
Reactive Demand Adj		$ 0.645	$ -	$ 0.645	$ -
Total Energy and Revenue	1,468,381		$ 106,264		$ 106,120

SGS: Secondary					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	85,083	$ 18.14	$ 1,543,403	$ 18.14	$ 1,543,403
Summer Block 2	5,296	$ 18.14	$ 96,068	$ 18.14	$ 96,068
Summer Block 3	314	$ 47.41	$ 14,907	$ 47.41	$ 14,907
Summer Block 4	8	$ 47.41	$ 358	$ 47.41	$ 358
Winter Block 1	167,779	$ 47.41	$ 7,954,407	$ 47.41	$ 7,954,407
Winter Block 2	9,936	$ 47.41	$ 471,065	$ 47.41	$ 471,065
Winter Block 3	607	$ 47.41	$ 28,776	$ 47.41	$ 28,776
Winter Block 4	13	$ 47.41	$ 624	$ 47.41	$ 624
Total Customer Charge	269,036		$ 10,109,609		$ 10,109,609
Facilities Charge					
Summer Block 1	635,868		$ -		$ -
Summer Block 2	244,245	$ 2.794	$ 682,421	$ 2.589	$ 632,319
Winter Block 1	1,232,325		$ -		$ -
Winter Block 2	454,781	$ 2.794	$ 1,270,658	$ 2.589	$ 1,177,369
Total Facilities Charge	2,567,219		$ 1,953,079		$ 1,809,688
Demand Charge					
Summer	679,073		$ -		$ -
Winter	1,134,841		$ -		$ -
Total Demand Charge	1,813,913		$ -		$ -
Energy Charge - Summer					
First 180 Hours Use per month	101,580,554	$ 0.14004	$ 14,225,341	$ 0.12976	$ 13,181,093
Next 180 Hours Use per month	53,634,609	$ 0.06150	$ 3,298,528	$ 0.05698	$ 3,056,100
Over 360 Hours Use per month	19,365,189	$ 0.05495	$ 1,064,117	$ 0.05092	$ 986,075
Energy Charge - Winter					
First 180 Hours Use per month	168,927,873	$ 0.11146	$ 18,828,701	$ 0.10328	$ 17,446,871
Next 180 Hours Use per month	81,955,962	$ 0.05254	$ 4,305,966	$ 0.04868	$ 3,989,616
Over 360 Hours Use per month	31,302,192	$ 0.04143	$ 1,296,850	$ 0.03839	$ 1,201,691
Total Energy Charge	456,766,379		$ 43,019,503		$ 39,861,446
Reactive Demand Adj	59,212	$ 0.645	$ 38,192	$ 0.598	$ 35,388
Total Energy and Revenue	456,766,379		$ 55,120,384		$ 51,816,132

SGS: Secondary Unmetered					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	3,671	$ 7.79	$ 28,599	$ 7.79	$ 28,599
Summer Block 2	0		$ -		$ -
Summer Block 3	0		$ -		
Summer Block 4	0		$ -		
Winter Block 1	7,156	$ 7.79	$ 55,743	$ 7.79	$ 55,743
Winter Block 2	0		$ -		$ -
Winter Block 3	0		$ -		
Winter Block 4	0		$ -		
Total Customer Charge	10,827		$ 84,342		$ 84,342
Facilities Charge					
Summer Block 1	4,887		$ -	$ -	$ -
Summer Block 2		$ 2.794	$ -	$ 2.589	$ -
Winter Block 1	9,517		$ -	$ -	$ -
Winter Block 2		$ 2.794	$ -	$ 2.589	$ -
Total Facilities Charge	14,404		$ -		$ -
Demand Charge					
Summer	4,887		$ -		$ -
Winter	9,517		$ -		$ -
Total Demand Charge	14,404		$ -		$ -
Energy Charge - Summer					
First 180 Hours Use per month	362,525	$ 0.14004	$ 50,768	$ 0.12976	$ 47,041
Next 180 Hours Use per month	90,426	$ 0.06150	$ 5,561	$ 0.05698	$ 5,152
Over 360 Hours Use per month	67,806	$ 0.05495	$ 3,726	$ 0.05092	$ 3,453
Energy Charge - Winter					
First 180 Hours Use per month	1,034,233	$ 0.11146	$ 115,276	$ 0.10328	$ 106,816
Next 180 Hours Use per month	262,734	$ 0.05254	$ 13,804	$ 0.04868	$ 12,790
Over 360 Hours Use per month	205,015	$ 0.04143	$ 8,494	$ 0.03839	$ 7,871
Total Energy Charge	2,022,738		$ 197,629		$ 183,122
Reactive Demand Adj		$ 0.645	$ -	$ 0.598	$ -
Total Energy and Revenue	2,022,738		$ 281,970		$ 267,464

SGS: Primary					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	0	$ 18.14	$ -	$ 18.14	$ -
Summer Block 2	7	$ 18.14	$ 134	$ 18.14	$ 134
Summer Block 3	0	$ 47.41	$ 18	$ 47.41	$ 18
Summer Block 4	0	$ 47.41	$ -	$ 47.41	$ -
Winter Block 1	0	$ 47.41	$ -	$ 47.41	$ -
Winter Block 2	12	$ 47.41	$ 561	$ 47.41	$ 561
Winter Block 3	3	$ 47.41	$ 126	$ 47.41	$ 126
Winter Block 4	0	$ 47.41	$ -	$ 47.41	$ -
Total Customer Charge	22		$ 839		$ 839
Facilities Charge					
Summer Block 1	201		$ -		$ -
Summer Block 2	435	$ 2.364	$ 1,029	$ 2.190	$ 953
Winter Block 1	377		$ -		$ -
Winter Block 2	1,803	$ 2.364	$ 4,263	$ 2.190	$ 3,950
Total Facilities Charge	2,817		$ 5,292		$ 4,904
Demand Charge					
Summer	572		$ -		$ -
Winter	2,034		$ -		$ -
Total Demand Charge	2,606		$ -		$ -
Energy Charge - Summer					
First 180 Hours Use per month	102,729	$ 0.13653	$ 14,026	$ 0.12651	$ 12,996
Next 180 Hours Use per month	79,214	$ 0.05981	$ 4,738	$ 0.05542	$ 4,390
Over 360 Hours Use per month	86,397	$ 0.05352	$ 4,624	$ 0.04959	$ 4,284
Energy Charge - Winter					
First 180 Hours Use per month	366,207	$ 0.10862	$ 39,777	$ 0.10065	$ 36,859
Next 180 Hours Use per month	308,514	$ 0.05124	$ 15,808	$ 0.04748	$ 14,648
Over 360 Hours Use per month	525,320	$ 0.04028	$ 21,160	$ 0.03732	$ 19,605
Total Energy Charge	1,468,381		$ 100,133		$ 92,783
Reactive Demand Adj		$ 0.645	$ -	$ 0.598	$ -
Total Energy and Revenue	1,468,381		$ 106,264		$ 98,525

SGA: Secondary					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	4,702	$ 18.14	$ 85,293	$ 18.14	$ 85,293
Summer Block 2	664	$ 18.14	$ 12,044	$ 18.14	$ 12,044
Summer Block 3	40	$ 47.41	$ 1,880	$ 47.41	$ 1,880
Summer Block 4	4	$ 47.41	$ 196	$ 47.41	$ 196
Winter Block 1	9,237	$ 47.41	$ 437,905	$ 47.41	$ 437,905
Winter Block 2	1,333	$ 47.41	$ 63,205	$ 47.41	$ 63,205
Winter Block 3	73	$ 47.41	$ 3,457	$ 47.41	$ 3,457
Winter Block 4	8	$ 47.41	$ 386	$ 47.41	$ 386
Total Customer Charge	16,060		$ 604,366		$ 604,366
Facilities Charge					
Summer Block 1	48,855		$ -		$ -
Summer Block 2	27,540	$ 2.794	$ 76,947	$ 2.589	$ 71,298
Winter Block 1	97,989		$ -		$ -
Winter Block 2	56,749	$ 2.794	$ 158,556	$ 2.589	$ 146,915
Total Facilities Charge	231,133		$ 235,503		$ 218,213
Demand Charge					
Summer	41,839		$ -		$ -
Winter	106,439		$ -		$ -
Total Demand Charge	148,279		$ -		$ -
Energy Charge - Summer					
First 180 Hours Use per month	6,241,719	$ 0.14004	$ 874,090	$ 0.12976	$ 809,925
Next 180 Hours Use per month	3,528,725	$ 0.06150	$ 217,017	$ 0.05698	$ 201,067
Over 360 Hours Use per month	1,420,107	$ 0.05495	$ 78,035	$ 0.05092	$ 72,312
Energy Charge - Winter					
First 180 Hours Use per month	14,592,845	$ 0.07579	$ 1,105,992	$ 0.07023	$ 1,024,855
Next 180 Hours Use per month	6,654,114	$ 0.04599	$ 306,023	$ 0.04261	$ 283,532
Over 360 Hours Use per month	2,728,103	$ 0.04018	$ 109,615	$ 0.03723	$ 101,567
Total Energy Charge	35,165,613		$ 2,690,771		$ 2,493,259
Reactive Demand Adj	4,467	$ 0.645	$ 2,881	$ 0.598	$ 2,670
Total Energy and Revenue	35,165,613		$ 3,533,522		$ 3,318,507

SGA: Primary					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	2	$ 18.14	$ 37	$ 18.14	$ 37
Summer Block 2	8	$ 18.14	$ 142	$ 18.14	$ 142
Summer Block 3	16	$ 47.41	$ 752	$ 47.41	$ 752
Summer Block 4	4	$ 47.41	$ 195	$ 47.41	$ 195
Winter Block 1	1	$ 47.41	$ 70	$ 47.41	$ 70
Winter Block 2	14	$ 47.41	$ 641	$ 47.41	$ 641
Winter Block 3	30	$ 47.41	$ 1,406	$ 47.41	$ 1,406
Winter Block 4	8	$ 47.41	$ 378	$ 47.41	$ 378
Total Customer Charge	82		$ 3,620		$ 3,620
Facilities Charge					
Summer Block 1	714		$ -		$ -
Summer Block 2	14,818	$ 2.364	$ 35,029	$ 2.190	$ 32,457
Winter Block 1	1,322		$ -	$ -	$ -
Winter Block 2	26,354	$ 2.364	$ 62,301	$ 2.190	$ 57,727
Total Facilities Charge	43,207		$ 97,330		$ 90,184
Demand Charge					
Summer	13,953		$ -		$ -
Winter	17,810		$ -		$ -
Total Demand Charge	31,764		$ -		$ -
Energy Charge - Summer					
First 180 Hours Use per month	1,068,595	$ 0.14004	$ 149,646	$ 0.12976	$ 138,661
Next 180 Hours Use per month	234	$ 0.06150	$ 14	$ 0.05698	$ 13
Over 360 Hours Use per month	0	$ 0.05495	$ -	$ 0.05092	$ -
Energy Charge - Winter					
First 180 Hours Use per month	1,300,919	$ 0.07579	$ 98,597	$ 0.07023	$ 91,364
Next 180 Hours Use per month	3,567	$ 0.04599	$ 164	$ 0.04261	$ 152
Over 360 Hours Use per month	0	$ 0.04018	$ -	$ 0.03723	$ -
Total Energy Charge	2,373,316		$ 248,421		$ 230,190
Reactive Demand Adj	612	$ 0.645	$ 395	$ 0.598	$ 366
Total Energy and Revenue	2,373,316		$ 349,766		$ 324,360

SGS: Secondary with Second Meter					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	1,041	$ 18.14	$ 18,891	$ 18.14	$ 18,891
Summer Block 2	513	$ 18.14	$ 9,308	$ 18.14	$ 9,308
Summer Block 3	0	$ 47.41	$ -	$ 47.41	
Summer Block 4	0	$ 47.41	$ -	$ 47.41	
Winter Block 1	2,042	$ 47.41	$ 96,799	$ 47.41	$ 96,799
Winter Block 2	1,027	$ 47.41	$ 48,687	$ 47.41	$ 48,687
Winter Block 3	0	$ 47.41	$ -	$ 47.41	
Winter Block 4	0	$ 47.41	$ -	$ 47.41	
Other Meter Summer	1,555	$ 2.14	$ 3,327	$ 2.14	$ 3,327
Other Meter Winter	3,069	$ 2.14	$ 6,567	$ 2.14	$ 6,567
Total Customer Charge	9,246		$ 183,579		$ 183,579
Facilities Charge					
Summer Block 1	26,282		$ -		$ -
Summer Block 2	5,948	$ 2.794	$ 16,618	$ 2.589	$ 15,398
Winter Block 1	52,108		$ -	$ -	$ -
Winter Block 2	12,325	$ 2.794	$ 34,437	$ 2.589	$ 31,908
Total Facilities Charge	96,663		$ 51,055		$ 47,306
Demand Charge					
Summer	15,946		$ -		$ -
Winter	48,624		$ -		$ -
Total Demand Charge	64,570		$ -		$ -
Energy Charge - Summer					
First 180 Hours Use per month	2,017,259	$ 0.14004	$ 282,497	$ 0.12976	$ 261,760
Next 180 Hours Use per month	486,048	$ 0.06150	$ 29,892	$ 0.05698	$ 27,695
Over 360 Hours Use per month	44,489	$ 0.05495	$ 2,445	$ 0.05092	$ 2,265
Energy Charge - Winter					
First 180 Hours Use per month	2,265,827	$ 0.11146	$ 252,549	$ 0.10328	$ 234,015
Next 180 Hours Use per month	487,953	$ 0.05254	$ 25,637	$ 0.04868	$ 23,754
Over 360 Hours Use per month	56,251	$ 0.04143	$ 2,330	$ 0.03839	$ 2,159
Second Meter Heating	4,174,278	$ 0.04018	$ 167,722	$ 0.03723	$ 155,408
Total Energy Charge	9,532,105		$ 763,073		$ 707,056
Reactive Demand Adj	511	$ 0.645	$ 330	$ 0.598	$ 305
Total Energy and Revenue	9,532,105		$ 998,036		$ 938,246

SGS: Secondary Unmetered					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	3,671	$ 7.79	$ 28,599	$ 7.79	$ 28,599
Summer Block 2	0		$ -		$ -
Summer Block 3	0		$ -		
Summer Block 4	0		$ -		
Winter Block 1	7,156	$ 7.79	$ 55,743	$ 7.79	$ 55,743
Winter Block 2	0		$ -		$ -
Winter Block 3	0		$ -		
Winter Block 4	0		$ -		
Total Customer Charge	10,827		$ 84,342		$ 84,342
Facilities Charge					
Summer Block 1	4,887		$ -		$ -
Summer Block 2		$ 2.794	$ -	$ 2.794	$ -
Winter Block 1	9,517		$ -		$ -
Winter Block 2		$ 2.794	$ -	$ 2.794	$ -
Total Facilities Charge	14,404		$ -		$ -
Demand Charge					
Summer	4,887		$ -		$ -
Winter	9,517		$ -		$ -
Total Demand Charge	14,404		$ -		$ -
Energy Charge - Summer					
First 180 Hours Use per month	362,525	$ 0.14004	$ 50,768	$ 0.14004	$ 50,768
Next 180 Hours Use per month	90,426	$ 0.06150	$ 5,561	$ 0.06150	$ 5,561
Over 360 Hours Use per month	67,806	$ 0.05495	$ 3,726	$ 0.05495	$ 3,726
Energy Charge - Winter					
First 180 Hours Use per month	1,034,233	$ 0.11146	$ 115,276	$ 0.11146	$ 115,276
Next 180 Hours Use per month	262,734	$ 0.05254	$ 13,804	$ 0.05254	$ 13,804
Over 360 Hours Use per month	205,015	$ 0.04143	$ 8,494	$ 0.04143	$ 8,494
Total Energy Charge	2,022,738		$ 197,629		$ 197,629
Reactive Demand Adj		$ 0.645	$ -	$ 0.645	$ -
Total Energy and Revenue	43,379,883		$ 281,970		$ 281,970

Business Electric Vehicle Charging Service					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	6	$ 105.97	$ 636	$ 105.97	$ 636
Facilities Charge	3,011	$ 3.07	$ 9,241	$ 3.07	$ 9,244
Energy					
Winter					
Off Peak	82,618	$ 0.082980	$ 6,856	$ 0.08298	$ 6,856
On Peak	35,329	$ 0.179790	$ 6,352	$ 0.17979	$ 6,352
Super Off Peak	7,378	$ 0.027550	$ 203	$ 0.02755	$ 203
Total Winter	125,325		$ 13,411		$ 13,411
Summer					
Off Peak	166,174	$ 0.047870	$ 7,955	$ 0.04787	$ 7,955
On Peak	73,393	$ 0.143600	$ 10,539	$ 0.14360	$ 10,539
Super Off Peak	18,972	$ 0.011840	$ 225	$ 0.01184	$ 225
Total Winter	258,539		$ 18,719		$ 18,719
Total Energy	383,864		$ 42,006		$ 42,009

Clean Charge Network					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	261	$ -	$ -	$ -	$ -
No Customer Charge					
Energy					
Winter					
Block 1	257,766	$ 0.200000	$ 51,553	$ 0.20000	$ 51,553
Block 2	14,113	$ 0.250000	$ 3,528	$ 0.25000	$ 3,528
Total Winter	271,879		$ 55,081		$ 55,081
Summer					
Block 1	164,478	$ 0.200000	$ 32,896	$ 0.20000	$ 32,896
Block 2		$ 0.250000	$ -	$ 0.25000	$ -
Total Winter	164,478		$ 32,896		$ 32,896
Total Energy	436,357		$ 87,977		$ 87,977

LGS: Secondary					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	3,838	$ 105.97	$ 406,752	$ 105.97	$ 406,752
Summer Block 2	315	$ 724.76	$ 228,552	$ 724.76	$ 228,552
Winter Block 1	7,403	$ 105.97	$ 784,496	$ 105.97	$ 784,496
Winter Blockt 2	646	$ 724.76	$ 468,397	$ 724.76	$ 468,397
Total Customer Charge	12,203		$ 1,888,196		$ 1,888,196
Facilities Charge					
Summer	1,990,721	$ 3.069	$ 6,109,523	$ 2.824	$ 5,621,796
Winter	3,933,869	$ 3.069	$ 12,073,043	$ 2.824	$ 11,109,245
Total Facilities Charge	5,924,590		$ 18,182,565		$ 16,731,041
Demand Charge					
Summer	1,842,128	$ 6.620	$ 12,194,890	$ 6.092	$ 11,222,247
Winter	3,380,259	$ 3.361	$ 11,361,049	$ 3.093	$ 10,455,140
Total Demand Charge	5,222,387		$ 23,555,940		$ 21,677,387
Energy Charge - Summer					
First 180 Hours Use per month	166,835,914	$ 0.06596	$ 11,004,497	$ 0.06070	$ 10,126,940
Next 180 Hours Use per month	144,399,106	$ 0.04714	$ 6,806,974	$ 0.04338	$ 6,264,033
Over 360 Hours Use per month	81,847,821	$ 0.02696	$ 2,206,617	$ 0.02481	$ 2,030,644
Energy Charge - Winter					
First 180 Hours Use per month	529,028,501	$ 0.06596	$ 34,894,720	$ 0.06070	$ 32,112,030
Next 180 Hours Use per month	440,999,684	$ 0.04714	$ 20,788,725	$ 0.04338	$ 19,130,566
Over 360 Hours Use per month	244,071,768	$ 0.02696	$ 6,580,175	$ 0.02481	$ 6,055,421
Total Energy Charge	1,607,182,794		$ 82,281,708		$ 75,719,635
Reactive Demand Adj	201,462	$ 0.682	$ 137,397	$ 0.628	$ 126,518
Total Energy and Revenue	1,607,182,794		$ 124,157,610		$ 114,254,580

LGS: Secondary with Second Meter					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	170	$ 105.97	$ 17,986	$ 105.97	$ 17,986
Summer Block 2	9	$ 724.76	$ 6,189	$ 724.76	$ 6,189
Winter Block 1	330	$ 105.97	$ 34,956	$ 105.97	$ 34,956
Winter Blockt 2	20	$ 724.76	$ 14,460	$ 724.76	$ 14,460
Other Meter Summer	178	$ 2.34	$ 417	$ 2.34	$ 417
Other Meter Winter	350	$ 2.34	$ 819	$ 2.34	$ 819
Total Customer Charge	1,056		$ 74,827		$ 74,827
Facilities Charge					
Summer	71,207	$ 3.069	$ 218,535	$ 2.824	$ 201,089
Winter	147,981	$ 3.069	$ 454,155	$ 2.824	$ 417,899
Total Facilities Charge	219,189		$ 672,690		$ 618,989
Demand Charge					
Summer	56,221	$ 6.620	$ 372,185	$ 6.092	$ 342,500
Winter	115,953	$ 3.361	$ 389,719	$ 3.093	$ 358,643
Total Demand Charge	172,175		$ 761,904		$ 701,143
Energy Charge - Summer					
First 180 Hours Use per month	9,009,954	$ 0.06596	$ 594,297	$ 0.06070	$ 546,904
Next 180 Hours Use per month	8,424,946	$ 0.04714	$ 397,152	$ 0.04338	$ 365,474
Over 360 Hours Use per month	4,255,042	$ 0.02696	$ 114,716	$ 0.02481	$ 105,568
Energy Charge - Winter					
First 180 Hours Use per month	9,009,954	$ 0.06596	$ 594,297	$ 0.06070	$ 546,904
Next 180 Hours Use per month	8,424,946	$ 0.04714	$ 397,152	$ 0.04338	$ 365,474
Over 360 Hours Use per month	4,255,042	$ 0.02696	$ 114,716	$ 0.02481	$ 105,568
Second Meter Heating	21,351,944	$ 0.02364	$ 504,760	$ 0.02175	$ 464,405
Total Energy Charge	43,379,883		$ 2,212,329		$ 2,035,892
Reactive Demand Adj	1,120	$ 0.682	$ 764	$ 0.628	$ 703
Total Energy and Revenue	43,379,883		$ 3,647,686		$ 3,356,727

LGS: Primary					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge					
Summer Block 1	73	$ 105.97	$ 7,748	$ 105.97	$ 7,748
Summer Block 2	101	$ 724.76	$ 73,109	$ 724.76	$ 73,109
Winter Block 1	132	$ 105.97	$ 14,008	$ 105.97	$ 14,008
Winter Blockt 2	198	$ 724.76	$ 143,289	$ 724.76	$ 143,289
Total Customer Charge	504		$ 238,155		$ 238,155
Facilities Charge					
Summer	351,404	$ 2.577	$ 905,568	$ 2.371	$ 833,179
Winter	637,538	$ 2.577	$ 1,642,937	$ 2.371	$ 1,511,604
Total Facilities Charge	988,943		$ 2,548,505		$ 2,344,783
Demand Charge					
Summer	292,387	$ 6.497	$ 1,899,639	$ 5.978	$ 1,747,890
Winter	517,960	$ 3.002	$ 1,554,915	$ 2.762	$ 1,430,604
Total Demand Charge	810,347		$ 3,454,554		$ 3,178,495
Energy Charge - Summer					
First 180 Hours Use per month	51,837,804	$ 0.06407	$ 3,321,248	$ 0.05896	$ 3,056,357
Next 180 Hours Use per month	47,762,869	$ 0.04573	$ 2,184,196	$ 0.04208	$ 2,009,862
Over 360 Hours Use per month	38,228,086	$ 0.02594	$ 991,637	$ 0.02387	$ 912,504
Energy Charge - Winter					
First 180 Hours Use per month	92,171,866	$ 0.04491	$ 4,139,438	$ 0.04133	$ 3,809,463
Next 180 Hours Use per month	85,829,263	$ 0.02784	$ 2,389,487	$ 0.02562	$ 2,198,946
Over 360 Hours Use per month	59,758,772	$ 0.02291	$ 1,369,073	$ 0.02108	$ 1,259,715
Total Energy Charge	375,588,660		$ 14,395,079		$ 13,246,847
Reactive Demand Adj	30,707	$ 0.682	$ 20,942	$ 0.628	$ 19,284
Total Energy and Revenue	375,588,660		$ 20,419,080		$ 18,789,408

LGS: Substation					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge	12	$ 773.70	$ 9,284	$ 773.70	$ 9,284
Facilities Charge					
Summer	135,302	$ 0.817	$ 110,541	$ 0.752	$ 101,747
Winter	38,667	$ 0.817	$ 31,591	$ 0.752	$ 29,078
Total Facilities Charge	173,969		$ 142,132		$ 130,824
Demand Charge - Summer					
First 2520 kw	98,590	$ 11.256	$ 1,109,734	$ 10.358	$ 1,021,200
Next 2520 kw	4,959	$ 10.513	$ 52,136	$ 9.674	$ 47,975
Demand Charge - Winter kW					
First 2520 kw	23,972	$ 7.650	$ 183,388	$ 7.039	$ 168,741
Next 2520 kw	7,743	$ 6.975	$ 54,006	$ 6.418	$ 49,693
Total Demand Charge	135,265		$ 1,399,265		$ 1,287,610
Energy Charge - Summer					
First 180 Hours Use per month	2,837,550	$ 0.05482	$ 155,555	$ 0.05044	$ 143,126
Next 180 Hours Use per month	2,837,550	$ 0.03323	$ 94,292	$ 0.03058	$ 86,772
Over 360 Hours Use per month	3,895,194	$ 0.01923	$ 74,905	$ 0.01770	$ 68,945
Energy Charge - Winter					
First 180 Hours Use per month	5,144,140	$ 0.05127	$ 263,740	$ 0.04718	$ 242,701
Next 180 Hours Use per month	5,144,140	$ 0.03620	$ 186,218	$ 0.03331	$ 171,351
Over 360 Hours Use per month	7,070,035	$ 0.02615	$ 184,881	$ 0.02406	$ 170,105
Total Energy Charge	26,928,610		$ 959,590		$ 883,000
Reactive Demand Adj	4,691	$ 0.682	$ 3,199	$ 0.628	$ 2,946
Total Energy and Revenue	26,928,610		$ 2,504,187		$ 2,304,380

MSG: Secondary					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge	46,181	$ 50.38	$ 2,326,609	$ 50.38	$ 2,326,609
Facilities Charge					
Summer	1,106,817	$ 2.940	$ 3,254,043	$ 2.625	$ 2,905,395
Winter	2,163,548	$ 2.940	$ 6,360,831	$ 2.625	$ 5,679,313
Total Facilities Charge	3,270,365		$ 9,614,874		$ 8,584,709
Demand Charge					
Summer	909,930	$ 4.114	$ 3,743,453	$ 3.673	$ 3,342,173
Winter	1,607,986	$ 2.859	$ 4,597,231	$ 2.552	$ 4,103,579
Total Demand Charge	5,222,387		$ 8,340,683		$ 7,445,753
Energy Charge - Summer					
First 180 Hours Use per month	151,665,652	$ 0.08807	$ 13,357,194	$ 0.07862	$ 11,923,954
Next 180 Hours Use per month	102,152,630	$ 0.05522	$ 5,640,868	$ 0.04930	$ 5,036,125
Over 360 Hours Use per month	25,850,306	$ 0.05587	$ 1,444,257	$ 0.04988	$ 1,289,413
Energy Charge - Winter					
First 180 Hours Use per month	257,096,823	$ 0.04650	$ 11,955,002	$ 0.04151	$ 10,672,089
Next 180 Hours Use per month	158,188,587	$ 0.02816	$ 4,454,591	$ 0.02514	$ 3,976,861
Over 360 Hours Use per month	34,965,451	$ 0.02448	$ 855,954	$ 0.02185	$ 763,995
Total Energy Charge	729,919,450		$ 37,707,866		$ 33,662,437
Reactive Demand Adj	99,487	$ 0.667	$ 66,358	$ 0.595	$ 59,239
Total Energy and Revenue	729,919,450		$ 48,441,516		$ 43,494,037

MSG: Secondary with Second Meter					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge	2,225	$ 50.38	$ 112,101	$ 50.38	$ 112,101
Second Meter	1,113	$ 2.36	$ 2,626	$ 2.36	$ 2,626
Facilities Charge					
Summer	31,434	$ 2.940	$ 92,417	$ 2.625	$ 82,515
Winter	64,002	$ 2.940	$ 188,167	$ 2.625	$ 168,006
Total Facilities Charge	95,437		$ 280,584		$ 250,521
Demand Charge					
Summer	21,311	$ 4.114	$ 87,673	$ 3.673	$ 78,275
Winter	46,948	$ 2.859	$ 134,225	$ 2.552	$ 119,812
Total Demand Charge	5,222,387		$ 221,898		$ 198,087
Energy Charge - Summer					
First 180 Hours Use per month	3,337,507	$ 0.08807	$ 293,934	$ 0.07862	$ 262,395
Next 180 Hours Use per month	1,655,611	$ 0.05522	$ 91,423	$ 0.04930	$ 81,622
Over 360 Hours Use per month	312,013	$ 0.05587	$ 17,432	$ 0.04988	$ 15,563
Energy Charge - Winter					
First 180 Hours Use per month	3,326,448	$ 0.04650	$ 154,680	$ 0.04151	$ 138,081
Next 180 Hours Use per month	1,698,824	$ 0.02816	$ 47,839	$ 0.02514	$ 42,708
Over 360 Hours Use per month	432,995	$ 0.02448	$ 10,600	$ 0.02185	$ 9,461
Second Meter Heating	5,495,983	$ 0.02448	$ 134,542	$ 0.02185	$ 120,087
Total Energy Charge	16,259,381		$ 750,449		$ 669,917
Reactive Demand Adj	629	$ 0.667	$ 420	$ 0.595	$ 374
Total Energy and Revenue	16,259,381		$ 1,084,868		$ 980,479

MSG: Primary					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Customer Charge	67	$ 50.38	$ 3,377	$ 50.38	$ 3,377
Facilities Charge					
Summer	5,018	$ 2.489	$ 12,490	$ 2.222	$ 11,150
Winter	9,577	$ 2.489	$ 23,837	$ 2.222	$ 21,280
Total Facilities Charge	14,595		$ 36,327		$ 32,430
Demand Charge					
Summer	4,452	$ 4.026	$ 17,922	$ 3.594	$ 15,999
Winter	4,625	$ 2.797	$ 12,935	$ 2.497	$ 11,548
Total Demand Charge	5,222,387		$ 30,857		$ 27,547
Energy Charge - Summer					
First 180 Hours Use per month	752,623	$ 0.08588	$ 64,635	$ 0.07667	$ 57,704
Next 180 Hours Use per month	172,505	$ 0.05349	$ 9,227	$ 0.04775	$ 8,237
Over 360 Hours Use per month	82,458	$ 0.05111	$ 4,214	$ 0.04563	$ 3,763
Energy Charge - Winter					
First 180 Hours Use per month	596,621	$ 0.04522	$ 26,979	$ 0.04037	$ 24,086
Next 180 Hours Use per month	261,445	$ 0.02738	$ 7,158	$ 0.02444	$ 6,390
Over 360 Hours Use per month	106,535	$ 0.02380	$ 2,536	$ 0.02125	$ 2,264
Total Energy Charge	1,972,187		$ 114,750		$ 102,442
Reactive Demand Adj	99,487	$ 0.667	$ 66,358	$ 0.595	$ 59,195
Total Energy and Revenue	1,972,187		$ 215,342		$ 192,561

EXHIBIT RHG-2

DOCKET NO. 23-EKCE-775-RTS

Residential Standard Service					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	7,358,885	$ 14.50	$ 106,703,827	$ 14.50	$ 106,703,827
Energy kWh					
Winter					
1st block - 500 kWh	2,062,944,832	$ 0.071987	$ 148,505,210	$ 0.08009	$ 165,221,252
2nd block - 400 kWh	828,390,905	$ 0.071987	$ 59,633,376	$ 0.08009	$ 66,345,828
3rd block - additional kWh	785,974,972	$ 0.058841	$ 46,247,553	$ 0.06545	$ 51,442,062
Total Winter	3,677,310,709		$ 254,386,139		$ 283,009,141
Summer					
1st block - 500 kWh	1,058,175,369	$ 0.071987	$ 76,174,870	$ 0.08009	$ 84,749,265
2nd block - 400 kWh	672,217,105	$ 0.071987	$ 48,390,893	$ 0.08009	$ 53,837,868
3rd block - additional kWh	1,030,510,698	$ 0.079405	$ 81,827,702	$ 0.08831	$ 91,004,400
Total Summer	2,760,903,173		$ 206,393,465		$ 229,591,533
Total Energy and Revenue	6,438,213,881		$ 567,483,431		$ 619,304,501

Residential Restricted Conservation					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	13,895	$ 14.50	$ 201,484	$ 14.50	$ 201,484
Demand kW					
Winter	8,678	$ -	$ -	$ -	$ -
Summer	4,157	$ -	$ -	$ -	$ -
Total Demand	12,835		$ -		$ -
Energy kWh					
Winter	12,513,988	$ 0.048606	$ 608,255	$ 0.05408	$ 677,407
Summer	841,039	$ 0.048606	$ 40,880	$ 0.05408	$ 45,527
Total Energy and Revenue	13,355,027		$ 850,619		$ 924,419

Residential Peak Management					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	56,602	$ 16.50	$ 933,928	$ 16.50	$ 933,928
Demand kW					
Winter	389,996	$ 2.13	$ 830,691	$ 2.37	$ 924,290
Summer	161,650	$ 6.91	$ 1,117,005	$ 7.69	$ 1,244,709
Total Demand	551,646		$ 1,947,696		$ 2,168,999
Energy kWh					
Winter	59,219,447	$ 0.043681	$ 2,586,765	$ 0.04860	$ 2,880,848
Summer	27,767,600	$ 0.043681	$ 1,212,917	$ 0.04860	$ 1,350,810
Total Energy	86,987,047		$ 3,799,681		$ 4,231,659
Total Energy and Revenue	86,987,047		$ 6,681,305		$ 7,334,586

Residential Demand					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	8,326	$ 14.50	$ 120,725	$ 14.50	$ 120,725
Demand kW					
Winter	26,456	$ 3.00	$ 79,368	$ 3.34	$ 88,363
Summer	16,566	$ 9.00	$ 149,093	$ 10.01	$ 165,990
Total Demand	43,022		$ 228,460		$ 254,352
Energy kWh					
Winter	5,938,172	$ 0.044888	$ 259,385	$ 0.04994	$ 288,876
Summer	3,822,886	$ 0.044888	$ 166,987	$ 0.04994	$ 185,973
Total Energy			$ 426,373		$ 474,848
Total Energy and Revenue	9,761,057		$ 775,558		$ 849,926

Residential Time of Use					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	2,050	$ 14.50	$ 29,726	$ 14.50	$ 29,726
Total Energy					
Winter					
Off Peak	769,067	$ 0.053036	$ 40,788	$ 0.05901	$ 45,426
On Peak	284,186	$ 0.085766	$ 24,374	$ 0.09542	$ 27,145
Total Winter	1,053,254		$ 65,162		$ 72,570
Summer					
Off Peak	490,033	$ 0.064516	$ 31,615	$ 0.07178	$ 35,209
Intermediate Peak	50,696	$ 0.100916	$ 5,116	$ 0.11228	$ 5,698
On Peak	177,990	$ 0.145484	$ 25,895	$ 0.16186	$ 28,839
Total Summer	718,719		$ 62,626		$ 69,746
Total Energy and Revenue	1,771,973		$ 157,513		$ 172,042

Total Energy and Revenue	6,550,088,986		$ 575,948,427		$ 628,585,474

RS-DG Standard Service					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	46,062	$ 14.50	$ 667,903	$ 14.50	$ 667,903
Energy kWh					
Winter					
1st block - 500 kWh	7,729,303	$ 0.071987	$ 556,409	$ 0.080090	$ 619,040
2nd block - 400 kWh	2,912,494	$ 0.071987	$ 209,662	$ 0.080090	$ 233,262
3rd block - additional kWh	5,145,099	$ 0.079405	$ 408,547	$ 0.088344	$ 454,539
Total Winter	15,786,897		$ 1,174,618		$ 1,306,840
Summer					
1st block - 500 kWh	4,786,642	$ 0.071987	$ 344,576	$ 0.080090	$ 383,362
2nd block - 400 kWh	2,139,541	$ 0.071987	$ 154,019	$ 0.080090	$ 171,356
3rd block - additional kWh	2,870,880	$ 0.058841	$ 168,925	$ 0.065465	$ 187,942
Total Summer	9,797,063		$ 667,521		$ 742,660
Total Energy and Revnue	25,583,960		$ 2,510,042		$ 2,717,404

RS-DG Demand					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	257	$ 14.50	$ 3,728	$ 14.50	$ 3,728
Demand kW					
Winter	909	$ 3.00	$ 2,727	$ 3.34	$ 3,036
Summer	568	$ 9.00	$ 5,113	$ 10.01	$ 5,692
Total Demand	1,477		$ 7,840		$ 8,729
Energy kWh					
Winter	102,272	$ 0.044888	$ 4,467	$ 0.04994	$ 4,975
Summer	53,367	$ 0.044888	$ 2,331	$ 0.04994	$ 2,596
Total Energy	155,639		$ 6,798		$ 7,571
Total Energy and Revnue	155,639		$ 18,367		$ 20,029

RS-DG Peak Management					
	Total Adjusted Billing Units	Current Rates	Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	125	$ 16.50	$ 2,063	$ 16.50	$ 2,063
Demand kW					
Winter	898	$ 2.13	$ 1,912	$ 2.37	$ 2,130
Summer	330	$ 6.91	$ 2,280	$ 7.69	$ 2,540
Total Demand	1,228		$ 4,193		$ 4,669
Energy kWh					
Winter	109,553	$ 0.043681	$ 4,785	$ 0.04860	$ 5,329
Summer	40,423	$ 0.043681	$ 1,766	$ 0.04860	$ 1,966
Total Energy	149,976		$ 6,551		$ 7,296
Total Energy	149,976		$ 12,806		$ 14,028

RS-DG Conservation					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	8				
Note: No energy usage or revenue except the customer charge collected					

Business Electric Vehicle Charging Service					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	33	$ 118.40	$ 3,939	$ 120.00	$ 3,992
Facilities Charge	18,768	$ 2.32	$ 43,543	$ 2.57	$ 48,241
Energy					
Winter					
Off Peak	451,477	$ 0.047870	$ 21,612	$ 0.05304	$ 23,946
On Peak	191,018	$ 0.143600	$ 27,430	$ 0.15910	$ 30,391
Super Off Peak	31,777	$ 0.011840	$ 376	$ 0.01312	$ 417
Total Winter	674,273		$ 49,419		$ 54,754
Summer					
Off Peak	887,670	$ 0.078790	$ 69,940	$ 0.08729	$ 77,485
On Peak	370,496	$ 0.220620	$ 81,739	$ 0.24443	$ 90,560
Super Off Peak	63,747	$ 0.015590	$ 994	$ 0.01727	$ 1,101
Total Winter	1,321,913		$ 152,672		$ 169,146
Total Energy	1,996,185		$ 249,572		$ 276,133

Electric Transit Service					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	5	$ 29.00	$ 145	$ 30.00	$ 150
Energy					
Winter					
Off Peak	18	$ 0.020340	$ 0	$ 0.02253	$ 0
On Peak	157	$ 0.138798	$ 22	$ 0.15378	$ 24
Total Winter	176		$ 22		$ 25
Summer					
Off Peak	19,322	$ 0.020340	$ 393	$ 0.02253	$ 435
On Peak	1,053	$ 0.138798	$ 146	$ 0.15378	$ 162
Total Winter	20,374		$ 539		$ 597
Total Energy	20,550		$ 706		$ 772

Electric Transit Service					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	12	$ 29.00	$ 348	$ 30.00	$ 360
Energy					
Winter					
Off Peak	226,261	$ 0.020340	$ 4,602	$ 0.02253	$ 5,098
On Peak	102,031	$ 0.138798	$ 14,162	$ 0.15378	$ 15,690
Total Winter	328,292		$ 18,764		$ 20,788
Summer					
Off Peak	98,298	$ 0.020340	$ 1,999	$ 0.02253	$ 2,215
On Peak	53,954	$ 0.138798	$ 7,489	$ 0.15378	$ 8,297
Total Winter	152,251		$ 9,488		$ 10,512
Total Energy	480,543		$ 28,600		$ 31,660

Clean Charge Network					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	12	$ -	$ -	$ -	$ -
No Customer Charge					
Energy					
Winter					
Block 1	44,044	$ 0.085459	$ 3,764	$ 0.09468	$ 4,170
Block 2	45,762	$ 0.102550	$ 4,693	$ 0.11362	$ 5,200
Total Winter	89,807		$ 8,457		$ 9,370
Summer					
Block 1	37,796	$ 0.085459	$ 3,230	$ 0.09468	$ 3,578
Block 2	36,793	$ 0.102550	$ 3,773	$ 0.11362	$ 4,180
Total Winter	74,589		$ 7,003		$ 7,759
Total Energy	164,395		$ 15,460		$ 17,129

Restricted Institutions (Churches)					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	3,756	$ -	$ -	$ -	$ -
No Customer Charge					
Energy					
Winter					
First 10 kWh	2,468	$ 19.166790	$ 47,313	$ 21.00680	$ 51,855
Weekday	2,022,394	$ 0.176678	$ 357,313	$ 0.19364	$ 391,616
Weekday Evening	946,414	$ 0.071299	$ 67,478	$ 0.07814	$ 73,953
Night and Weekend	4,515,761	$ 0.048062	$ 217,037	$ 0.05268	$ 237,890
Total Winter	7,487,038		$ 689,141		$ 755,315
Summer					
First 10 kWh	1,145	$ 19.166790	$ 21,940	$ 21.00680	$ 24,046
Weekday	2,033,529	$ 0.071299	$ 144,989	$ 0.07814	$ 158,900
Weekday Evening	939,302	$ 0.071299	$ 66,971	$ 0.07814	$ 73,397
Night and Weekend	3,684,800	$ 0.048062	$ 177,099	$ 0.05268	$ 194,115
Total Winter	6,658,775		$ 410,998		$ 450,458
Total Energy and Revenue	14,145,813		$ 1,100,139		$ 1,205,773

Large General Service: Secondary					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	804	$ 320.00	$ 257,280	$ 325.00	$ 261,300
Demand kW					
Winter	1,124,266	$ 15.206401	$ 17,096,045	$ 16.51168	$ 18,563,526
Summer	602,271	$ 15.206401	$ 9,158,374	$ 16.51168	$ 9,944,506
Total Demand	602,271		$ 26,254,419		$ 28,508,032
Energy kWh					
Winter	499,728,442	$ 0.013556	$ 6,774,319	$ 0.01472	$ 7,356,003
Summer	301,711,737	$ 0.013556	$ 4,090,004	$ 0.01472	$ 4,441,197
Total Energy	801,440,179		$ 10,864,323		$ 11,797,199
Total Energy and Revenue	801,440,179		$ 37,376,022		$ 40,566,532

Large General Service: Primary					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Current Rates	Revenue from Current Rates
Number of Bills	1,457	$ 320.00	$ 466,336	$ 325.00	$ 473,623
Demand kW					
Winter	3,355,320	$ 14.199589	$ 47,644,165	$ 15.41844	$ 51,733,800
Summer	1,775,416	$ 14.199589	$ 25,210,181	$ 15.41844	$ 27,374,149
Total Demand	1,775,416		$ 72,854,346		$ 79,107,949
Energy kWh					
Winter	1,702,044,368	$ 0.012526	$ 21,319,808	$ 0.01360	$ 23,147,803
Summer	933,353,524	$ 0.012526	$ 11,691,186	$ 0.01360	$ 12,693,608
Total Energy	2,635,397,893		$ 33,010,994		$ 35,841,411
Total Energy and Revenue	2,635,397,893		$ 106,331,676		$ 115,422,983

Large General Service: Transmission					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Current Rates	Revenue from Current Rates
Number of Bills	258	$ 320.00	$ 82,517	$ 325.00	$ 83,807
Demand kW					
Winter	1,004,013	$ 12.116851	$ 12,165,481	$ 13.15693	$ 13,209,735
Summer	498,222	$ 12.116851	$ 6,036,879	$ 13.15693	$ 6,555,069
Total Demand	498,222		$ 18,202,361		$ 19,764,804
Energy kWh					
Winter	162,846,130	$ 0.011836	$ 1,927,447	$ 0.01286	$ 2,094,201
Summer	326,437,146	$ 0.011836	$ 3,863,710	$ 0.01286	$ 4,197,982
Total Energy	489,283,276		$ 5,791,157		$ 6,292,183
Total Energy and Revenue	489,283,276		$ 24,076,035		$ 26,140,793

Medium General Service					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	16,615	$ 118.42	$ 1,967,584	$ 120.00	$ 1,993,836
					$ -
Demand kW					
Winter	4,241,974	$ 16.150000	$ 68,507,886	$ 17.49848	$ 74,228,104
Summer	2,444,125	$ 16.150000	$ 39,472,622	$ 17.49848	$ 42,768,476
Total Demand	2,444,125		$ 107,980,509		$ 116,996,580
Energy kWh					
Winter	1,480,853,758	$ 0.014471	$ 21,429,435	$ 0.01568	$ 23,219,787
Summer	911,598,478	$ 0.010987	$ 10,015,732	$ 0.01190	$ 10,848,022
Total Energy	2,392,452,236		$ 31,445,167		$ 34,067,809
Total Energy and Revenue	2,392,452,236		$ 141,393,260		$ 153,058,225

Schools: Restricted Schools					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	5,418	$ 29.00	$ 157,122	$ 30.00	$ 162,540
Energy kWh					
Winter					
0 - 12,500 kWh	22,707,117	$ 0.067939	$ 1,542,699	$ 0.07455	$ 1,692,816
Additonal	43,305,600	$ 0.050245	$ 2,175,890	$ 0.05513	$ 2,387,438
Summer					
0 - 1,200 kWh	22,959,340	$ 0.067939	$ 1,559,835	$ 0.07455	$ 1,711,619
1,200+	17,926,173	$ 0.050245	$ 900,701	$ 0.05513	$ 988,270
Total Energy	106,898,231		$ 4,636,425		$ 5,087,326
Total Energy and Revenue	106,898,231		$ 4,793,547		$ 5,249,866

Schools: Restricted Schools with Space Heating					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	5,426	$ 29.00	$ 157,354	$ 30.00	$ 162,780
Energy kWh					
Winter					
0 - 1,200 kWh	2,706,221	$ 0.067939	$ 183,858	$ 0.07455	$ 201,749
1,200+	4,165,069	$ 0.050245	$ 209,274	$ 0.05513	$ 229,620
Separate Heating	9,460,474	$ 0.050245	$ 475,342	$ 0.05513	$ 521,556
Summer					$ -
0 - 1,200 kWh	4,437,718	$ 0.067939	$ 301,494	$ 0.07455	$ 330,832
1,200+	3,753,959	$ 0.050245	$ 188,618	$ 0.05513	$ 206,956
Total Energy	24,523,441		$ 965,453		$ 1,059,344
Total Energy and Revenue	24,523,441		$ 1,122,807		$ 1,222,124

Schools: Restricted Education					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	5,832	$ 29.00	$ 169,125	$ 30.00	$ 174,957
Energy					
Winter					
1st block - 500 kWh	94,259,960	$ 0.052520	$ 4,950,533	$ 0.05763	$ 5,432,201
2nd block - 400 kWh	39,987,413	$ 0.041310	$ 1,651,880	$ 0.04533	$ 1,812,629
3rd block - additional kWh	22,489,959	$ 0.029956	$ 673,709	$ 0.03287	$ 739,245
Total Winter	156,737,332		$ 7,276,122		$ 7,984,076
Summer					
1st block - 500 kWh	56,274,224	$ 0.052520	$ 2,955,522	$ 0.05763	$ 3,243,084
2nd block - 400 kWh	30,518,175	$ 0.059365	$ 1,811,711	$ 0.06514	$ 1,987,954
3rd block - additional kWh	19,470,869	$ 0.061249	$ 1,192,571	$ 0.06721	$ 1,308,637
Total Summer	106,263,268		$ 5,959,805		$ 6,539,675
Total Energy	263,000,600		$ 13,405,052		$ 14,698,707

Schools: Electric School and Church					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	754	$ -	$ -	$ -	$ -
Energy kWh					
Winter	4,873,576	$ 0.052158	$ 254,196	$ 0.05723	$ 278,915
Summer	2,317,556	$ 0.063382	$ 146,891	$ 0.06955	$ 161,186
Total Energy and Revenue	7,191,132		$ 401,087		$ 440,101

Schools: Standard Education					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	6,031	$ 29.00	$ 174,900	$ 30.00	$ 180,931
Demand kW					
Winter	498,923	$ 8.420000	$ 4,200,929	$ 9.23920	$ 4,609,646
Summer	300,817	$ 8.420000	$ 2,532,878	$ 9.23920	$ 2,779,307
Total Demand	799,740		$ 6,733,807		$ 7,388,953
Energy kWh					
Winter	131,004,371	$ 0.024684	$ 3,233,712	$ 0.02709	$ 3,548,908
Summer	87,114,266	$ 0.024684	$ 2,150,329	$ 0.02709	$ 2,359,925
Total Energy	218,118,637		$ 5,384,040		$ 5,908,834
Total Energy and Revenue	218,118,637		$ 12,292,747		$ 13,478,718

Small General Service: Standard					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	1,038,514	$ 22.73	$ 23,605,419	$ 24.00	$ 24,924,332
Demand kW					
Winter					
On-Peak	2,146,336	$ -	$ -	$ -	$ -
Off-Peak	6,063,703	$ 4.43	$ 26,862,204	$ 4.76	$ 28,863,226
Summer					
On-Peak	1,131,436	$ -	$ -	$ -	$ -
Off-Peak	3,868,035	$ 8.56	$ 33,110,383	$ 9.20	$ 35,585,926
Total Demand	13,209,510		$ 59,972,587		$ 64,449,151
Energy kWh					
Winter					
0 - 1,200 kWh	453,220,541	$ 0.065447	$ 29,661,925	$ 0.07030	$ 31,861,404
1,200+	1,631,033,200	$ 0.047631	$ 77,687,742	$ 0.05118	$ 83,476,279
Summer					
0 - 1,200 kWh	236,428,914	$ 0.065447	$ 15,473,563	$ 0.07030	$ 16,620,953
1,200+	1,092,917,411	$ 0.047631	$ 52,056,749	$ 0.05118	$ 55,935,513
Total Energy	3,413,598,401		$ 174,879,979		$ 187,894,149
Total Energy and Revenue	3,413,598,401		$ 258,457,986		$ 277,267,632

Small General Service: Unmetered					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	4,427	$ 22.73	$ 100,636	$ 24.00	$ 106,259
Energy kWh					
Winter					
0 - 1,200 kWh	415,591	$ 0.065447	$ 27,199	$ 0.07030	$ 29,216
1,200+	109,351	$ 0.047631	$ 5,208	$ 0.05118	$ 5,597
Summer					
0 - 1,200 kWh	(41,429)	$ 0.065447	$ (2,711)	$ 0.07030	$ (2,912)
1,200+	26,447	$ 0.047631	$ 1,260	$ 0.05118	$ 1,354
Total Energy	509,959		$ 30,956		$ (1,559)
Total Energy and Revenue	509,959		$ 131,592		$ 104,700

Small General Service: Church Option					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	60	$ 22.73	$ 1,364	$ 24.00	$ 1,440
Demand kW					
Winter					
On-Peak	173	$ -	$ -	$ -	$ -
Off-Peak	1,327	$ 1.370000	$ 1,818	$ 1.47	$ 1,951
Summer					
On-Peak	81	$ -	$ -	$ -	$ -
Off-Peak	319	$ 2.500000	$ 798	$ 2.69	$ 859
Total Demand	1,901		$ 2,617		$ 2,810
Energy kWh					
Winter					
0 - 1,200 kWh	32,827	$ 0.065447	$ 2,148	$ 0.07030	$ 2,308
1,200+	60,121	$ 0.047631	$ 2,864	$ 0.05118	$ 3,077
Summer					
0 - 1,200 kWh	11,696	$ 0.065447	$ 765	$ 0.07030	$ 822
1,200+	2,871	$ 0.047631	$ 137	$ 0.05118	$ 147
Total Energy	107,515		$ 5,914		$ 6,354
Total Energy and Revenue	107,515		$ 9,895		$ 10,604

Small General Service Generation Substitution					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	839	$ 51.00	$ 42,772	$ 53.00	$ 44,449
Energy					
Winter					
1st block - 500 kWh	11,084,128	$ 0.053105	$ 588,623	$ 0.05706	$ 632,460
2nd block - 400 kWh	11,203,294	$ 0.045550	$ 510,310	$ 0.04894	$ 548,289
3rd block - additional kWh	5,022,651	$ 0.038971	$ 195,738	$ 0.04187	$ 210,298
Total Winter	27,310,073		$ 1,294,670		$ 1,391,048
Summer					
1st block - 500 kWh	5,715,924	$ 0.053105	$ 303,544	$ 0.05706	$ 326,151
2nd block - 400 kWh	6,201,407	$ 0.045550	$ 282,474	$ 0.04894	$ 303,497
3rd block - additional kWh	3,206,135	$ 0.038971	$ 124,946	$ 0.04187	$ 134,241
Total Summer	15,123,466		$ 710,965		$ 763,888
Total Energy and Revenue	42,433,539		$ 2,048,407		$ 2,199,386

Small General Service: Off-Peak Service					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	40	$ 128.00	$ 5,120	$ 130.00	$ 5,200
Demand kW					
Winter					
On-Peak	221	$ 12.06	$ 2,667	$ 12.96	$ 2,866
Off-Peak	93,967	$ 2.37	$ 222,703	$ 2.55	$ 239,617
Summer				$ -	
On-Peak	3,492	$ 12.06	$ 42,118	$ 12.96	$ 45,261
Off-Peak	54,256	$ 2.37	$ 128,588	$ 2.55	$ 138,354
Total Demand	151,937		$ 396,075		$ 426,098
Energy kWh					
Winter	7,840,222	$ 0.019125	$ 149,944	$ 0.02055	$ 161,117
Summer	3,807,260	$ 0.019125	$ 72,814	$ 0.02055	$ 78,239
Total Energy	11,647,482		$ 222,758		$ 239,356
Total Energy and Revenue	11,647,482		$ 623,953		$ 670,654

Small General Service: Dedicated Off-Peak

		Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills			$ 128.00	$ -	$ 130.00	$ -
Excess Demand kW						
	Winter	0				
	Summer					
Total Demand		0				
Energy						
	Winter					
	1st block - 500 kWh					
	2nd block - 400 kWh					
	3rd block - additional kWh					
Total Winter						
	Summer					
	1st block - 500 kWh					
	2nd block - 400 kWh					
	3rd block - additional kWh					
Total Summer						
Total Energy						

Small General Service: Recreational Lighting					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	6,564	$ 22.73	$ 149,194	$ 24.00	$ 157,530
Energy kWh					
Winter	3,970,000	$ 0.082856	$ 328,938	$ 0.08903	$ 353,449
Summer	2,226,572	$ 0.082856	$ 184,485	$ 0.08903	$ 198,232
Total Energy	6,196,572		$ 513,423		$ 551,681
Total Energy and Revenue	6,196,572		$ 662,618		$ 709,211

Small General Service: Short Term					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Number of Bills	16,794	$ 22.73	$ 381,728	$ 24.00	$ 403,056
Demand kW					
Winter					
On-Peak	18,307	$ -	$ -	$ -	$ -
Off-Peak	7,143	$ 4.430000	$ 31,645	$ 4.76	$ 34,003
Summer					
On-Peak	9,110	$ -	$ -	$ -	$ -
Off-Peak	2,598	$ 8.560000	$ 22,236	$ 9.20	$ 23,898
Total Demand	37,158		$ 53,881		$ 57,901
Energy kWh					
Winter	2,464,293	$ 0.065447	$ 161,281	$ 0.07030	$ 173,240
Summer	263,419	$ 0.065447	$ 17,240	$ 0.07032	$ 1,212
Total Energy	2,727,712		$ 178,521		$ 174,452
Total Energy and Revenue	2,727,712		$ 614,129		$ 635,409

Special Contract: Holy Frontier Refinery					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Energy					
Winter					
1st block -					
2nd block -					
3rd block -					
4th block -					
Total Winter					
Summer					
1st block -					
2nd block -					
3rd block -					
Total Summer					
Total Energy and Revenue					

Special Contract: Occidental Chemical					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Energy					
Winter					
1st block -					
2nd block -					
3rd block -					
4th block -					
Total Winter					
Summer					
1st block -					
2nd block -					
3rd block -					
Total Summer					
Total Energy and Revenue					

Special Contract: Spirit Aerosystems					
	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Proposed Rates	Revenue from Proposed Rates
Energy					
Winter					
1st block -					
2nd block -					
3rd block -					
4th block -					
Total Winter					
Summer					
1st block -					
2nd block -					
3rd block -					
4th block -					
Total Summer					
Total Energy and Revenue					

Large Tire Manufacturing								
Customer Usage	Total Adjusted Billing Units		Current Rates		Revenue from Current Rates		Proposed Rates	Revenue from Proposed Rates
Number of Bills	12				$ -			$ -
Demand kW								
Winter	166,711	$	15.325614	$	2,554,952		16.95835	$ 2,827,147
Summer	89,717	$	15.325614	$	1,374,974		16.95835	$ 1,521,459
Total Demand	256,429			$	3,929,926			$ 4,348,606
Energy kWh								
Winter	22,115,507	$	0.016823	$	372,049		0.01862	$ 411,791
Summer	11,033,048	$	0.016823	$	185,609		0.01862	$ 205,435
Total Energy	33,148,555			$	557,658			$ 617,226
Total Energy and Revenue	33,148,555			$	4,487,584			$ 4,965,832

Interruptible Contract Service								
Customer Usage	Total Adjusted Billing Units		Current Rates		Revenue from Current Rates		Proposed Rates	Revenue from Proposed Rates
Number of Bills	12	$	128.00	$	1,536	$	130.00	$ 1,560
Energy kWh								
Winter	12,352,218	$	0.040795	$	503,909		0.04514	$ 557,579
Summer	6,171,203	$	0.040795	$	251,754		0.04514	$ 278,568
Total Energy	18,523,421			$	755,663			$ 836,147
Total Energy and Revenue	18,523,421			$	755,663			$ 836,147

Large Power Service: Primary					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Current Rates	Revenue from Current Rates
Number of Bills	12	$ 325.00	$ 3,900	$ 330.00	$ 3,960
Demand kW					
Winter	405,853	$ 14.199589	$ 5,762,950	15.71236	$ 6,376,913
Summer	210,018	$ 14.199589	$ 2,982,164	15.71236	$ 3,299,873
Total Demand	210,018		$ 8,745,115		$ 9,676,786
Energy kWh					
Winter	285,877,000	$ 0.013805	$ 3,946,532	0.01528	$ 4,368,201
Summer	148,681,000	$ 0.013805	$ 2,052,541	0.01528	$ 2,271,846
Total Energy	434,558,000		$ 5,999,073		$ 6,640,046
Total Energy and Revenue	434,558,000		$ 14,748,088		$ 16,320,792

Large Power Service: Transmission					
Customer Usage	Total Adjusted Billing Units	Current Rates	Revenue from Current Rates	Current Rates	Revenue from Current Rates
Number of Bills	12	$ 325.00	$ 3,900	$ 330.00	$ 3,960
Demand kW					
Winter	240,271	$ 11.538040	$ 2,772,256	12.76726	$ 3,067,602
Summer	144,876	$ 11.538040	$ 1,671,585	12.76726	$ 1,849,670
Total Demand	385,147		$ 4,443,841		$ 4,917,272
Energy kWh					
Winter	72,908,696	$ 0.013115	$ 956,198	0.01451	$ 1,057,905
Summer	105,446,850	$ 0.013115	$ 1,382,935	0.01451	$ 1,530,034
Total Energy	178,355,546		$ 2,339,133		$ 2,587,939

Total Energy and Revenue	**178,355,546**	**$ 6,786,874**	**$ 7,509,171**

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

VERIFICATION

Robert Glass, being duly sworn upon his oath deposes and states that he is the Chief of Economic Policy and Planning for the Utilities Division of the Kansas Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Testimony,* and attests that the statements contained therein are true and correct to the best of his knowledge, information and belief.

Robert Glass
Chief of Economic Policy and Planning
State Corporation Commission of the
State of Kansas

Subscribed and sworn to before me this 28 day of August, 2023.

Abigail DeAnne Emery
Notary Public State of Kansas
My Appt Expires 10/8/23

Notary Public

CERTIFICATE OF SERVICE

23-EKCE-775-RTS

I, the undersigned, certify that a true copy of the attached testimony has been served to the following by means of electronic service via CoreShare and/or electronic mail on August 30, 2023.

JOSEPH R. ASTRAB, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
j.astrab@curb.kansas.gov

DAVID BANKS, CEM, CEP
FLINT HILLS ENERGY CONSULTANT
117 S PARKRIDGE
WICHITA, KS 67209
david@fheconsultants.net

DOROTHY BARNETT
CLIMATE & ENERGY PROJECT
PO BOX 1858
HUTCHINSON, KS 67504-1858
barnett@climateandenergy.org

SHELLY M BASS, SENIOR ATTORNEY
ATMOS ENERGY CORPORATION
5430 LBJ FREEWAY
1800 THREE LINCOLN CENTRE
DALLAS, TX 75240
shelly.bass@atmosenergy.com

MELISSA M. BUHRIG, EXEC. VICE PRESIDENT, GEN. COUNSEL & SECRETARY
CVR ENERGY, INC.
2277 Plaza Dr., Ste. 500
Sugar Land, TX 77479
mmbuhrig@cvrenergy.com

DANIEL J BULLER, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
dbuller@foulston.com

GLENDA CAFER, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY
800 SW JACKSON
SUITE 1310
TOPEKA, KS 66612-1216
gcafer@morrislaing.com

FRANK A. CARO, JR., ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
fcaro@polsinelli.com

DEREK S. CASEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N. Rock Road, Suite 300
Wichita, KS 67226
dscasey@twgfirm.com

JOHN B. COFFMAN, ATTORNEY AT LAW
JOHN B. COFFMAN
871 Tuxedo Blvd.
St. Louis, MO 63119
john@johncoffman.net

CERTIFICATE OF SERVICE

23-EKCE-775-RTS

PAUL T. DAVIS
PAUL DAVIS LAW FIRM, LLC
932 Massachusetts St.
Suite 301
Lawrence, KS 66044
pdavis@pauldavislawfirm.com

CATHRYN J. DINGES, SR DIRECTOR & REGULATORY AFFAIRS COUNSEL
EVERGY KANSAS CENTRAL, INC
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
cathy.dinges@evergy.com

ABIGAIL EMERY, GRANT SPECIALIST
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
a.emery@kcc.ks.gov

BRIAN G. FEDOTIN, GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
b.fedotin@kcc.ks.gov

JAMES G. FLAHERTY, ATTORNEY
ANDERSON & BYRD, L.L.P.
216 S HICKORY
PO BOX 17
OTTAWA, KS 66067
jflaherty@andersonbyrd.com

JUSTIN GRADY, CHIEF OF REVENUE REQUIREMENTS, COST OF SERVICE & FINANCE
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
j.grady@kcc.ks.gov

JASON T GRAY, ATTORNEY
DUNCAN & ALLEN
1730 Rhode Island Ave., NW
Suite 700
Washington, DC 20036
jtg@duncanallen.com

ASHOK GUPTA, EXPERT
NATIONAL RESOURCES DEFENSE COUNCIL
20 N WACKER DRIVE SUITE 1600
CHICAGO, IL 60606
agupta@nrdc.org

WALKER HENDRIX, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
w.hendrix@kcc.ks.gov

ROBERT HORTON III
TITUS LAW FIRM, LLC
7304 W. 130th St.
Suite 190
Overland Park, KS 66213
trey@tituslawkc.com

DARRIN R. IVES, V.P. REGULATORY AFFAIRS
EVERGY METRO, INC
D/B/A EVERGY KANSAS METRO
One Kansas City Place
1200 Main St., 19th Floor
Kansas City, MO 64105
darrin.ives@evergy.com

ANDRIA JACKSON, DEPUTY CHIEF OF REVENUE REQ., COST OF SERVICE & FINANCE
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
a.jackson@kcc.ks.gov

CERTIFICATE OF SERVICE

23-EKCE-775-RTS

JARED R. JEVONS, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
jjevons@polsinelli.com

RONALD A. KLOTE, DIRECTOR, REGULATORY AFFAIRS
EVERGY METRO, INC
D/B/A EVERGY KANSAS METRO
ONE KANSAS CITY PLACE
1200 MAIN, 19TH FLOOR
KANSAS CITY, MO 64105
ronald.klote@evergy.com

ERNEST KUTZLEY, KS ADVOCACY DIRECTOR
AARP
6220 SW 29th St.
Suite 300
TOPEKA, KS 66614
ekutzley@aarp.org

KEVIN K. LACHANCE, CONTRACT LAW ATTORNEY
UNITED STATES DEPARTMENT OF DEFENSE
ADMIN & CIVIL LAW DIVISION
OFFICE OF STAFF JUDGE ADVOCATE
FORT RILEY, KS 66442
kevin.k.lachance.civ@army.mil

AHSAN LATIF, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
a.latif@kcc.ks.gov

TIMOTHY J LAUGHLIN, ATTORNEY
SCHOONOVER & MORIARTY, LLC
130 N. CHERRY STREET, STE 300
OLATHE, KS 66061
tlaughlin@schoonoverlawfirm.com

DAN LAWRENCE, GENERAL COUNSEL - USD 259
UNIFIED SCHOOL DISTRICT 259
903 S EDGEMOOR RM 113
WICHITA, KS 67218
dlawrence@usd259.net

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
t.love@curb.kansas.gov

RITA LOWE, PARALEGAL
MORRIS LAING EVANS BROCK & KENNEDY CHTD
300 N MEAD STE 200
WICHITA, KS 67202-2745
rlowe@morrislaing.com

KRISTINA LUKE-FRY, MANAGING AUDITOR
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
k.luke-fry@kcc.ks.gov

CARLY MASENTHIN, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
c.masenthin@kcc.ks.gov

KACEY S MAYES, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
ksmayes@twgfirm.com

CERTIFICATE OF SERVICE

23-EKCE-775-RTS

TIMOTHY E. MCKEE, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
temckee@twgfirm.com

JOHN J. MCNUTT, GENERAL ATTORNEY
U.S. ARMY LEGAL SERVICES AGENCY
REGULATORY LAW OFFICE
9275 GUNSTON RD., STE. 1300
FORT BELVOIR, VA 22060-5546
john.j.mcnutt.civ@army.mil

DAVID W. NICKEL, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.nickel@curb.kansas.gov

TIM OPITZ
OPITZ LAW FIRM, LLC
308 E. HIGH STREET
SUITE B101
JEFFERSON CITY, MO 65101
tim.opitz@opitzlawfirm.com

SARAH C. OTTO
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
sotto@foulston.com

SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
s.rabb@curb.kansas.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.smith@curb.kansas.gov

VALERIE SMITH, ADMINISTRATIVE ASSISTANT
MORRIS LAING EVANS BROCK & KENNEDY
800 SW JACKSON
SUITE 1310
TOPEKA, KS 66612-1216
vsmith@morrislaing.com

LEE M SMITHYMAN, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
lsmithyman@foulston.com

CONNOR A THOMPSON, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
cthompson@foulston.com

ROBERT R. TITUS
TITUS LAW FIRM, LLC
7304 W. 130th St.
Suite 190
Overland Park, KS 66213
rob@tituslawkc.com

ROBERT E. VINCENT, MANAGING ATTORNEY
KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.
7421 W. 129TH STREET
OVERLAND PARK, KS 66213
robert.vincent@onegas.com

CERTIFICATE OF SERVICE

23-EKCE-775-RTS

C. EDWARD WATSON, ATTORNEY
FOULSTON SIEFKIN LLP
1551 N. Waterfront Parkway
Suite 100
Wichita, KS 67206
cewatson@foulston.com

LESLIE R WINES, SR EXECUTIVE ADMIN ASSISTANT
EVERGY METRO, INC
D/B/A EVERGY KANSAS METRO
One Kansas City Place
1200 Main St., 19th Floor
Kansas City, MO 64105
leslie.wines@evergy.com

TREVOR WOHLFORD, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY
800 SW JACKSON
SUITE 1310
TOPEKA, KS 66612-1216
twohlford@morrislaing.com

WILL B. WOHLFORD, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY CHTD
300 N MEAD STE 200
WICHITA, KS 67202-2745
wwohlford@morrislaing.com

JAMES P ZAKOURA, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
jzakoura@foulston.com

/S/ Abigail Emery
Abigail Emery