Exhibit No.:

Issue(s):

Revenue

Witness:

Seoung Joun Won PhD MoPSC Staff

Sponsoring Party: Type of Exhibit:

True-Up Testimony

Case No.: Date Testimony Prepared: ER-2016-0285 March 1, 2017

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

FILED March 20, 2017 Data Center

OPERATIONAL ANALYSIS DEPARTMENT

Missouri Public Service Commission

ENGINEERING ANALYSIS UNIT

TRUE-UP DIRECT TESTIMONY

OF

SEOUNG JOUN WON PhD.

State Exhibit No. 256

Vate 3-16-17 Reporter 24

File No. FR - 2016-0258

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2016-0285

Jefferson City, Missouri March 2017

TRUE-UP DIRECT TESTIMONY 1 2 **OF** SEOUNG JOUN WON PhD. 3 KANSAS CITY POWER & LIGHT COMPANY 4 5 CASE NO. ER-2016-0285 6 Q. Please state your name and business address. 7 My name is Seoung Joun Won, and my business address is P.O. Box 360, 200 A. 8 Madison Street, Jefferson City, MO 65102. 9 Q. By whom are you employed and in what capacity? I am employed by the Missouri Public Service Commission ("Commission") as a 10 A. Regulatory Economist III of the Tariff and Rate Design Unit of the Operation Analysis 11 12 Department, the Commission Staff Division. Q. Are you the same Seoung Joun Won who has previously filed testimony in Staff's 13 14 Revenue Requirement Cost of Service Report in this case? A. Yes. 15 What is the purpose of your true-up testimony? Q. 16 17 A. The purpose of my testimony is to address the Commission Staff ("Staff")'s true-up energy efficiency adjustment for Kansas City Power & Light Company's ("KCPL") 18 MEEIA Cycle 2 kWh savings. 19 Q. What adjustment did Staff make for MEEIA cycle 2 kWh savings? 20 Staff made a true-up energy efficiency adjustment consistent with paragraph 21 Α. II.10.a.(i) of the Non-Unanimous Stipulation and Agreement Resolving MEEIA Filings 22

("Cycle 2 Stipulation") approved in Case. No. EO-2015-0240. Staff annualized energy efficiency kWh based on saving measures installed by the end of the true-up period, December 31, 2016, that were reported by KCPL in response to Staff's data request No. 0391.1. Staff's witness Michael Stahlman used this information for making an adjustment to true-up billing determinants consistent with paragraph II.10.b. of the Cycle 2 Stipulation.

- Q. What other changes were made due to the energy efficiency adjustment?
- A. Staff's calculation of net system input and fuel and purchased power expense are changed by the energy efficiency adjustment. Mr. Michael Stahlman determined the total true-up kWh after making adjustments based on energy efficiency and other known and measurable changes during the true-up period. I then used the true-up total kWh to calculate Staff's net system input. Staff Witness Charles Poston used the results of the net system input analysis for his calculation of fuel and purchased power expense.
 - Q. Did Staff adjust hourly load shapes consistent with the Cycle 2 Stipulation?
- A. No. Staff made no adjustment of hourly load shapes. According to the response to Staff's data request No. 0328, KCPL does not have hourly load shapes or marginal loss factors for the MEEIA Cycle 2 programs. For more detailed information of the Cycle 2 Stipulation, please see Staff witness Sarah Kliethermes' true-up testimony. In addition, the impact of the hourly load adjustment on fuel and purchased power expense will be addressed by Mr. Charles Poston in his true-up testimony.
 - Q. Does that conclude your testimony?
 - A. Yes, it does.

¹ Kansas City Power & Light Company, P.S.C. MO. No. 7. Original Sheet Nos. 49K and 49L

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light) Company's Request for Authority to) Case No. ER-2016-0285 Implement A General Rate Increase for) Electric Service)
AFFIDAVIT OF SEOUNG JOUN WON PhD
STATE OF MISSOURI)
COUNTY OF COLE) ss.
COMES NOW SEOUNG JOUN WON PhD, and on his oath declares that he is of sound
mind and lawful age; that he contributed to the foregoing True-Up Direct Testimony; and that
the same is true and correct according to his best knowledge and belief.
Further the Affiant sayeth not. Sung Justle
SEOUNG JOUN WON PhD
JURAT
Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for
the County of Cole, State of Missouri, at my office in Jefferson City, on this day
of February, 2017.
D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: December 12, 2020 Commission Number: 12412070 Notary Public