#### FILED October 23, 2018 Data Center Missouri Public Service Commission

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service

### Case No. ER-2018-0145

### NOTICE OF CORRECTION TO FUEL ADJUSTMENT CLAUSE BASE RATE IN CORRECTED SURREBUTTAL AND TRUE-UP DIRECT TESTIMONY OF CATHERINE F. LUCIA

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and for its *Notice of Correction To Fuel Adjustment Clause Base Rate In Corrected Surrebuttal and True-Up Direct Testimony of Catherine F. Lucia* ("Notice") states that Staff is filing corrected testimony to correct a typographical error in the fuel adjustment clause base rate reflected in Staff witness Lucia's surrebuttal and true-up direct testimony originally filed on September 4, 2018. To avoid any confusion the Staff is filing a corrected version of Ms. Lucia's testimony in its entirety.

WHEREFORE, Staff prays the Commission accept its Notice and Ms. Lucia's Corrected Surrebuttal and True-Up Direct Testimony.

Respectfully submitted,

#### /s/ Robert S. Berlin

Robert S. Berlin Deputy Staff Counsel Missouri Bar No. 51709

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 526-7779 (Telephone) (573) 751-9285 (Fax) bob.berlin@psc.mo.gov

Staff Exhibit No. 237 Date 9-25-18 Reporter 74 File No. ER-248-0145+0146

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 10<sup>th</sup> day of September, 2018.

# <u>/s/ Robert S. Berlin</u>

Exhibit No.: Issue: Witness: Sponsoring Party: Type of Exhibit:

FAC Base Factor Catherine F. Lucia MoPSC Staff Corrected Surrebuttal and True-up Direct Testimony ER-2018-0145 September 10, 2018

Case No.: Date Testimony Prepared:

# **MISSOURI PUBLIC SERVICE COMMISSION**

# **COMMISSION STAFF DIVISION**

**ENERGY RESOURCES DEPARTMENT** 

# CORRECTED

### SURREBUTTAL AND TRUE-UP DIRECT TESTIMONY

OF

# **CATHERINE F. LUCIA**

# **KANSAS CITY POWER & LIGHT COMPANY**

CASE NO. ER-2018-0145

Jefferson City, Missouri September 2018

TABLE OF CONTENTS OF		
CORRECTED SURREBUTTAL AND		
TRUE-UP DIRECT TESTIMONY		
OF		
CATHERINE F. LUCIA		
KANSAS CITY POWER & LIGHT COMPANY		
CASE NO. ER-2018-0145		
MONTROSE STATION - UNITS 2 AND 3		
VOLTAGE ADJUSTMENT FACTORS		
TRUE-UP BASE FACTOR		

1	CORRECTED SURREBUTTAL AND		
2	TRUE-UP DIRECT TESTIMONY		
3	OF		
4	CATHERINE F. LUCIA		
5	KANSAS CITY POWER & LIGHT COMPANY		
6	CASE NO. ER-2018-0145		
7	Q. Please state your name and business address.		
8	A. My name is Catherine Lucia and my business address is P.O. Box 360,		
9	200 Madison Street, Jefferson City, MO 65102.		
10	Q. By whom are you employed and in what capacity?		
11	A. I am a Utility Regulatory Auditor IV in the Energy Resources Department with		
12	the Missouri Public Service Commission ("Commission").		
13	Q. Are you the same Catherine Lucia who has previously filed testimony in		
14	this case?		
15	A. Yes, I filed testimony in Staff's Cost of Service ("COS") Report, Staff's		
16	Class Cost of Service Report ("CCOS") Report, and Rebuttal Testimony filed in the		
17	Kansas City Power & Light Company ("KCPL") and KCPL Greater Missouri Operations		
18	Company ("GMO") rate cases designated as Case No. ER-2018-0145 and ER-2018-0146 on		
19	June 19, 2018, July 6, 2018, and August 7, 2018, respectively.		
20	Q. What is the purpose of your Surrebuttal and True-up Direct testimony?		
21	A. I will present Staff's position on the inclusion of fuel costs for the Montrose		
22	Station, units 2 and 3, which is addressed in the rebuttal testimony of Office of the Public		
23	Counsel witnesses Lena Mantle and John A. Robinett, both filed July 27, 2018. I will present		

### Corrected Surrebuttal and True-Up Testimony of Catherine F. Lucia

Staff's current position for the voltage adjustment factors based on the surrebuttal testimony
 of Staff witness Alan J. Bax. I will present the true-up of Staff's fuel adjustment clause
 ("FAC") base factor as of the true-up date of June 30, 2018.

4

#### **MONTROSE STATION - UNITS 2 AND 3**

5 Q. In regard to Lena Mantle's and John A. Robinett's testimonies, as they relate to 6 the inclusion of fuel costs for Montrose Station, units 2 and 3, what is Staff's response?

A. Staff's position is these units should be included in the fuel model because they
are still in service and the expected retirement date of December 31, 2018, is outside of the
test year, which ends June 30, 2017.

### 10 VOLTAGE ADJUSTMENT FACTORS

No.

Å.

Q. Has Staff's position in regards to the voltage adjustment factors changed from
Staff's Direct CCOS?

A. Yes, based on surrebuttal testimony of Staff witness Alan J. Bax and his review of the line loss study dated June 12, 2018. Staff supports the addition of a fourth voltage adjustment factor, substation to transmission voltage level customers (substation), to the existing three factors; transmission, primary, and secondary.

17

Q. Will these voltage adjustment factors impact the FAC?

18 A. Yes, these voltage adjustment factors are a component of the Fuel Adjustment
19 Rate (FAR).

20 Q. Will the change in voltage adjustment factors impact the base factor?

21

Corrected Surrebuttal and True-Up Testimony of Catherine F. Lucia

1	TRUE-UP BASE FACTOR		
2	Q.	What is Staff's true-up base factor?	
3	А.	Staff's true-up base factor, as of June 30, 2018, for the KCPL FAC is	
4	\$0.01675.		
5	Q.	Is this the same base factor provided in the CCOS Report?	
6	А.	No, it has been adjusted based on the inclusion of costs for dust control and	
7	freeze protections found in FERC Account 501000, a correction of an amount shown for		
8	FERC Account 509000, which reflected Missouri jurisdictional rather than total company,		
9	and an updated fuel run which changed the Net System Input ("NSI") and the pass-through		
10	SPP transmission cost percentage.		
11	Q.	Does that conclude your testimony?	
12	А.	Yes.	
	-		

Page 3

#### BEFORE THE PUBLIC SERVICE COMMISSION

#### **OF THE STATE OF MISSOURI**

)

)

)

In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service

Case No. ER-2018-0145

#### **AFFIDAVIT OF CATHERINE F. LUCIA**

STATE OF MISSOURI

) ss.

**COMES NOW CATHERINE F. LUCIA** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Corrected Surrebuttal and True-Up Direct Testimony* and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

**CATHERINE F. LUCIA** 

#### 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  $10^{44}$  day of September 2018.

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