Exhibit No.:

Issue: True-Up Adjustments

Witness: Kim Cox

Sponsoring Party: MoPSC Staff
Type of Exhibit: True-Up Direct Testimony

Case Nos.: ER-2018-0145 and

ER-2018-0146

Date Testimony Prepared: September 4, 2018

# MISSOURI PUBLIC SERVICE COMMISSION COMMISSION STAFF DIVISION TARIFF / RATE DESIGN DEPARTMENT

# TRUE-UP DIRECT TESTIMONY

**OF** 

# KIM COX

# KANSAS CITY POWER & LIGHT COMPANY CASE NO. ER-2018-0145

AND

KCP&L GREATER MISSOURI OPERATIONS COMPANY CASE NO. ER-2018-0146

Jefferson City, Missouri September 2018

1	TRUE-UP DIRECT TESTIMONY				
2	OF				
3	KIM COX				
4 5	KANSAS CITY POWER & LIGHT COMPANY CASE NO. ER-2018-0145				
6	AND				
7 8	KCP&L GREATER MISSOURI OPERATIONS COMPANY CASE NO. ER-2018-0146				
9	Q. Please state your name and business address.				
10	A. My name is Kim Cox, and my business address is Missouri Public Service				
11	Commission, P.O. Box 360, Jefferson City, Missouri, 65102.				
12	Q. By whom are you employed and in what capacity?				
13	A. I am employed by the Missouri Public Service Commission ("Commission")				
14	as a Policy Analyst II in the Tariff/Rate Design Department of the Commission Staff				
15	Division.				
16	Q. Are you the same Kim Cox who contributed to sections in Staff's Revenue				
17	Requirement Cost of Service Report ("COS Report")?				
18	A. Yes.				
19	Q. What is the purpose of your True-Up Direct Testimony?				
20	A. The purpose of my True-Up Direct Testimony is to address; (1) the				
21	Commission Staff's ("Staff") true-up energy efficiency ("EE") adjustment for Kansas City				
22	Power and Light Company ("KCPL") and KCP&L Greater Missouri Operations ("GMO"),				
23	(2) the GMO SGS and LGS class billing determinants adjustment, and (3) the growth				
24	adjustment for KCPL and GMO.				

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	Killi Cox				
1	TRUE-UP ADJUSTMENTS				
2	Q. Did Staff make a true-up adjustment for EE?				
3	A. Yes. Dr. Seoungjoun Won provided true-up EE adjustments based on				
4	cumulative kWh savings as of June 2018 of which Staff has accounted for in its true-up filing.				
5	The adjustment was performed in the workpapers "ER-2018-0146 GMO Revenues true-up"				
6	and "ER-2018-0145 KCP&L Revenues true-up."				
7	Q. Do other witnesses for Staff discuss the EE adjustment?				
8	A. Yes, Robin Kliethermes discusses the EE adjustment in her				
9	True-Up/Surrebuttal Testimony.				
10	Q. At page 44 of the COS Report, Staff stated that it would review actual billing				
11	determinants for November 2017 through June 2018 and make any necessary adjustments				
12	once actual billing determinants are supplied. Have the actual billing determinants been				
13	supplied?				
14	A. Yes, Staff received the actual billing determinants on July 31, 2018.				
15	Q. Has Staff reviewed the information provided?				
16	A. Yes. In reviewing the actual usage information for the time period of				
17	November 2017 – April 2018, it appears that Staff's direct-filed estimated usage for the SGS				
18	demand class and the LGS class is higher than the actual usage that is being experienced for				
19	the SGS demand class and the LGS class as it is currently constituted.				

Q. Has Staff revised its estimated annualized usage for the SGS demand class and LGS class?

- A. Yes, as it pertains to usage during the pre-consolidated months of November 2016 April 2017. For these months, Staff applied an adjustment to the pre-consolidated monthly usage to account for post consolidation usage.
  - Q. Is this an adjustment Staff would typically make in true-up?
- A. No. However, under the circumstances of this case, load research data is not available for the months of November 2017 April 2018 for GMO and the load research data that is available for the months of November 2016 April 2017 for GMO does not reflect the SGS demand class and LGS class as currently constituted, so an adjustment was made.
- Q. What is the difference between the GMO SGS demand class and the LGS class as constituted before and after April 2017?
- A. In April 2017, GMO introduced significant changes in rate design that caused movement of customers among classes. For the SGS demand class in particular, many customers moved down to the SGS non-demand class, but those customers had below-average usage. Meanwhile, a relatively small number of customers moved down to the SGS demand class from the LGS class, but the average usage of those customer far exceeded the otherwise average usage per customer of the SGS demand class.
  - Q. Did Staff make a true-up growth adjustment?
- A. Yes. Ms. Antonija Nieto provided growth for the following KCPL classes: RES, SGS, MGS and LGS. Ms. Nieto also provided growth for the GMO residential class. These adjustments can be found in the same workpapers as the EE adjustments.

1 Q. Did Staff make a true-up growth adjustment for the GMO SGS and LGS class? 2 Yes. Staff made a growth adjustment to the months of May 2017 through A. 3 October 2017 by applying the June 2018 customer charge count to those months. Q. 4 Did Staff adjust for growth in the months of November 2016 through 5 April 2017? 6 A. As noted earlier, Staff did not have consolidated billing determinants for theses 7 months and, therefore, used actuals from November 2017 through April 2018. The actual 8 customer charges already take into account the growth that occurred that is known and 9 measurable. Q. 10 Does this conclude your True-Up Direct Testimony? 11 A. Yes, it does.

## BEFORE THE PUBLIC SERVICE COMMISSION

### OF THE STATE OF MISSOURI

In the Matter of Kansas City Power &	)	£
Light Company's Request for Authority	Ć	Case No. ER-2018-0145
to Implement a General Rate Increase for	)	
Electric Service	)	and
In the Matter of KCP&L Greater	)	60
Missouri Operations Company's Request	)	Case No. ER-2018-0146
for Authority to Implement a General	)	
Rate Increase for Electric Service	)	
		y a
AFFIDAVI	T OF K	IM COX

STATE OF MISSOURI ) ss. COUNTY OF COLE )

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

Further the Affiant sayeth not.

KIM COX

**JURAT** 

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