Exhibit No.:

Issue(s): Policy

Witness: Natelle Dietrich Sponsoring Party: MoPSC Staff

Type of Exhibit: Surrebuttal Testimony

Case No.: ER-2016-0285

Date Testimony Prepared: January 27, 2017

MISSOURI PUBLIC SERVICE COMMISSION COMMISSION STAFF DIVISION

SURREBUTTAL TESTIMONY

OF

NATELLE DIETRICH

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2016-0285

Jefferson City, Missouri January 2017

1 SURREBUTTAL TESTIMONY 2 OF 3 NATELLE DIETRICH 4 KANSAS CITY POWER & LIGHT COMPANY 5 CASE NO. ER-2016-0285 6 Q. Please state your name and business address. 7 A. My name is Natelle Dietrich. My business address is 200 Madison St., 8 Jefferson City, Missouri 65101. 9 Q. Are you the same Natelle Dietrich that previously filed Direct Testimony in 10 this case on November 30, 2016 and December 14, 2016? A. 11 Yes I am. 12 Q. What is the purpose of your surrebuttal testimony? 13 A. The purpose of my surrebuttal testimony is to respond to the rebuttal 14 testimonies of Kansas City Power & Light Company's ("KCPL") witness Tim M. Rush and 15 Natural Resources Defense Council's (NRDC) witness Noah Garcia as their testimonies 16 discuss Staff's position on the Clean Charge Network (CCN), filed on December 30, 2016. 17 Q. To what specifically related to the CCN rebuttal testimonies will you be 18 responding? 19 A. At page 50, lines 7 and 8, of his December 30, 2016, rebuttal testimony 20 Mr. Rush states, "...[KCPL] does not understand Staff's position that this regulated service 21 should be treated below the line. If the service is regulated, it should be treated above the 22 line, unless the Company's investment is determined to be imprudent." Similarly, Mr. Garcia, 23 at page 4, lines 9 and 10, states, "NRDC appreciates Staff's consideration of these issues, but

18

19

Q.

A.

Yes.

1 does not agree that investment should be associated with the CCN be recorded 'below-the-2 line. 3 Q. Does Staff agree with the comments of Mr. Rush and Mr. Garcia? 4 A. Yes it does. As indicated in the rebuttal testimony of Staff witness 5 Byron Murray filed on January 6, 2017, Staff reviewed the rebuttal testimonies of Mr. Rush and Mr. Garcia and consulted further with Staff Counsel. The CCN, and electric vehicle 6 7 charging stations in general, are relatively new, especially in Missouri general rate 8 proceedings. As such, Staff's position has continued to evolve as it works through the issues 9 in this case, the Ameren Missouri EV docket (Case No. ET-2016-0246), and in 10 Ameren Missouri's general rate proceeding (Case No. ER-2016-0179). 11 Q. You indicate Staff's position has continued to evolve. What is Staff recommending in this case with respect to the CCN? 12 13 As explained in the rebuttal testimonies of Mr. Murray, as well as Staff witness A. 14 Robin Kliethermes, also filed on January 6, 2017, Staff recommends the costs, expenses, and 15 revenues associated with the CCN be recorded above-the-line, with an associated revenue 16 imputation for any costs not covered by the revenue generated by the charging stations. This 17 continues Staff's position to hold ratepayers harmless.

Does this conclude your surrebuttal testimony?

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	NAT	ELLE DIETRICH

STATE OF MISSOURI) ss. COUNTY OF COLE)

COMES NOW NATELLE DIETRICH, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Surrebuttal Testimony; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

NATELLE DIETRICH

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 21th day of January, 2017.

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 28, 2019 Commission Number: 15207377 Notary Public