Exhibit No.:Issue(s):Economic ConsiderationsWitness/Type of Exhibit:Meisenheimer/DirectSponsoring Party:Public CounselCase No.:ER-2012-0175

DIRECT TESTIMONY

OF

BARBARA A. MEISENHEIMER

Submitted on Behalf of the Office of the Public Counsel

KANSAS CITY POWER & LIGHT GREATER MISSOURI OPERATIONS COMPANY

CASE NO. ER-2012-0175

August 9, 2012

BEFORE THE PUBLIC SERVICE COMMISSION **OF THE STATE OF MISSOURI**

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

File No. ER-2012-0175

AFFIDAVIT OF BARBARA A. MEISENHEIMER

STATE OF MISSOURI)) SS COUNTY OF COLE)

Barbara A. Meisenheimer, of lawful age and being first duly sworn, deposes and states:

- 1. My name is Barbara A. Meisenheimer. I am a Chief Utility Economist for the Office of the Public Counsel.
- 2. Attached hereto and made a part hereof for all purposes is my direct testimony.
- 3. I hereby swear and affirm that my statements contained in the attached affidavit are true and correct to the best of my knowledge and belief.

Barbara A. Meisenheimer

Subscribed and sworn to me this 9th day of August 2012.



JERENE A. BUCKMAN My Commission Expires August 23, 2013 **Cole County** Commission #09754037

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Jerene A. Buckman Notary Public

My commission expires August 23, 2013.

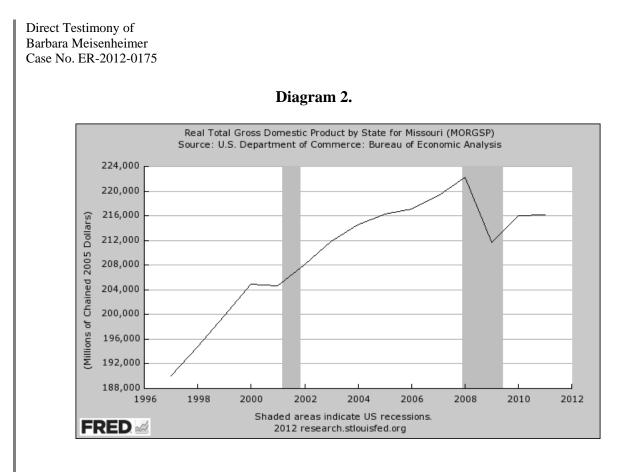
		Kansas City Power & Light Greater Missouri Operations Company
		Class Cost of Service and Rate Design
		ER-2012-0175
		Direct Testimony of
		Barbara Meisenheimer
1	Ι.	INTRODUCTION
2	Q.	PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.
3	A.	Barbara A. Meisenheimer, Chief Utility Economist, Office of the Public Counsel,
4		P. O. 2230, Jefferson City, Missouri 65102. I am also an adjunct instructor for
5		William Woods University.
6	Q.	PLEASE SUMMARIZE YOUR EDUCATIONAL AND EMPLOYMENT BACKGROUND.
7	A.	I hold a Bachelor of Science degree in Mathematics from the University of
8		Missouri-Columbia (UMC) and have completed the comprehensive exams for a
9		Ph.D. in Economics from the same institution. My two fields of study are
10		Quantitative Economics and Industrial Organization. My outside field of study is
11		Statistics.
12		I have been with the Office of the Public Counsel since January 1996. I have
13		testified before the Missouri Public Service Commission (Commission) on
14		economic issues and policy issues in the areas of telecommunications, gas, electric,
15		water and sewer. In rate cases my testimony has addressed class cost of service,

1		rate design, miscellaneous tariff issues, low-income and conservation programs and
2		
Z		revenue requirement issues related to the development of class revenues, billing
3		units, low-income program costs, incentive programs and fuel cost recovery.
4		Over the past 15 years I have also taught courses for the following
5		institutions: University of Missouri-Columbia, William Woods University, and
6		Lincoln University. I currently teach undergraduate and graduate level economics
7		courses for William Woods University.
8	Q.	HAVE YOU TESTIFIED IN PAST KANSAS CITY POWER & LIGHT RATE CASES?
9	A.	Yes. I testified on class cost of service and rate design issues in Kansas City Power &
10		Light (KCP&L or the Company) Case No. ER-2006-0314, Case No. ER-2007-0291
11		and Case No. ER 2010-0355. I also testified in Case No. ER-2005-0436 and Case
12		No. ER-2010-0356 regarding class cost of service and rate design for KCP&L's
13		Greater Missouri Operations (GMO) service area previously acquired from Aquila
14		Inc. and on class cost of service and rate design in Aquila Inc. Case No. EO-2002-
15		384.
16	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY?
17	A.	My direct testimony addresses economic and public policy issues the Commission
18		should consider in determining the appropriate level of revenue requirement for
19		KCP&L GMO. In recent years Missouri's economy has been plagued by slow

20 growth, high unemployment, under-employment and only marginal wage growth.
21 Consumers are finding it increasingly difficult to make ends meet, some to the point

1		of crisis. In this testimony I explain that the Commission can and should treat rate
2		affordability as a key factor in determining the Company's revenue requirement.
3	Q.	WHAT DO YOU BELIEVE SHOULD BE THE COMMISSION'S FOCUS IN RESOLVING THIS
4		CASE?
5	A.	In this case, Public Counsel urges the Commission to decide issues in a manner that
6		recognizes the economic challenges faced by households in KCP&L GMO's service
7		area and reasonably minimizes the rate impact on consumers. The Commission
8		should also focus on allowing customers greater control over their electric bills.
9	Q.	SHOULD THE COMMISSION CONSIDER THE ECONOMIC CLIMATE AND FACTS SUCH
10		AS UNEMPLOYMENT RATES AND PREVIOUS RATE INCREASES WHEN DETERMINING
11		WHAT RATES ARE JUST AND REASONABLE?
12	A.	Yes. It is the Commission's job to set just and reasonable rates. Public Counsel
13		has argued and the Commission has recognized that in addition to cost of service,
14		other relevant factors to consider in setting rates include the value of a service, the
15		affordability of service, rate impacts, and rate continuity.
16	Q.	PLEASE COMMENT ON THE RATE OF UNEMPLOYMENT IN KCP&L GMO'S SERVICE
17		AREA.
18	A.	According to information submitted as part of the Company's minimum filing
19		requirements, as illustrated below, KCP&LGMO serves portions of 24 counties in
20		Western and Northern Missouri through its MPS system and serves portions of 10
21		Northwestern counties through its L&P system.

Direct Testimony of Barbara Meisenheimer Case No. ER-2012-0175 1 Diagram 1. **GMO-MPS** GMO-L&P 2 3 Q. WHAT ECONOMIC FACTORS HAVE AN IMPACT ON RATE AFFORDABILITY? 4 A. Output growth, often measured as a change in Real Gross Domestic Product, the 5 levels of unemployment and under-employment and inflation in consumer prices 6 all impact the general affordability of rates. 7 Q. PLEASE DESCRIBE THE RECENT PERFORMANCE OF OUTPUT GROWTH. 8 A. Real Gross Domestic Product (RGDP) measures the inflation-adjusted value of all 9 new, final goods and services produced within a geographic area. Diagram 2 10 which is based on data compiled by the U.S. Department of Commerce Bureau of 11 Economic Analysis (BEA) and reported by the Saint Louis branch of the Federal 12 Reserve, illustrates that Missouri's RGDP remains stagnant below the December 13 2007 level. As I will discuss later in this testimony, the reduction in output since 14 December 2007 shown in Diagram 2 corresponds to a period of significant 15 unemployment throughout Missouri.



BEA data for the Kansas City Metropolitan Statistical Area which includes portions of Missouri and Kansas indicates negative RGDP growth for the period 2007-2009, with positive but below average growth over the period 2009-2010.

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Also significant is that prior to the recent recession, Missouri had experienced moderate but relatively steady growth as illustrated by the pre-December 2007 trend shown in Diagram 2. Relatively steady economic growth over time promotes confidence leading to new investment, increased employment opportunities and wage growth. It is still unclear if the recession was only a temporary shock that can be overcome or if there will be a more harmful long-term impact on Missouri households. Direct Testimony of Barbara Meisenheimer Case No. ER-2012-0175

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Q. PLEASE COMMENT ON THE RATE OF UNEMPLOYMENT IN KCP&L'S GMO SERVICE AREAS. A. As illustrated in Table 1. and Table 2., according to the U.S. Bureau of Labor

Statistics (BLS) Quarterly Census of Employment and Wages, every KCP&L GMO service area county experienced an increase in unemployment between 2006 and 2011.

Table 1.

Local Area Unemployment Statistics GMO-MPS

	Annual	Annual	Annual	Annual	Annual	Annual	Increase
	2006	2007	2008	2009	2010	2011	2006-2011
Barton	5.20%	8.60%	9.00%	10.80%	10.90%	9.90%	90%
Bates	5.60%	6.00%	6.90%	10.80%	11.00%	10.40%	86%
Benton	5.40%	5.90%	6.70%	10.10%	10.40%	10.10%	87%
Buchanan	4.50%	4.40%	5.00%	8.60%	8.30%	7.40%	64%
Carroll	4.60%	5.00%	6.80%	10.60%	10.60%	10.10%	120%
Cass	4.60%	4.90%	5.70%	9.70%	9.60%	8.60%	87%
Cedar	5.10%	5.60%	6.30%	9.30%	8.40%	8.10%	59%
Clay	4.30%	4.30%	5.00%	8.60%	8.50%	7.70%	79%
Clinton	4.90%	5.10%	5.70%	10.00%	10.40%	10.00%	104%
Dade	4.60%	5.20%	6.10%	9.00%	9.00%	9.00%	96%
Daviess	4.40%	4.40%	5.20%	9.10%	9.50%	8.90%	102%
Grundy	4.50%	4.80%	5.40%	7.80%	7.60%	7.20%	60%
Harrison	4.60%	4.50%	4.70%	7.80%	8.40%	7.90%	72%
Henry	5.10%	5.60%	6.50%	9.70%	9.90%	9.40%	84%
Jackson	5.70%	5.80%	6.70%	10.30%	10.70%	9.60%	68%
Johnson	4.00%	4.60%	5.10%	8.60%	8.80%	8.40%	110%
Lafayette	4.80%	5.10%	5.90%	9.90%	10.30%	9.80%	104%
Livingston	4.20%	4.40%	5.00%	7.90%	8.10%	8.10%	93%
Mercer	4.30%	4.10%	4.70%	7.40%	7.80%	6.40%	49%
Pettis	5.00%	5.20%	6.00%	8.90%	8.70%	8.30%	66%
Platte	3.90%	3.90%	4.60%	7.80%	7.80%	7.20%	85%
Ray	5.20%	5.30%	6.10%	10.20%	10.70%	9.90%	90%
St. Clair	5.60%	6.50%	6.80%	9.90%	10.90%	10.30%	84%
Vernon	4.40%	4.80%	5.40%	8.00%	7.70%	7.20%	64%

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Table 2.

Local Area Unemployment Statistics GMO-L&P

County	Annual 2006	Annual 2007	Annual 2008	Annual 2009	Annual 2010	Annual 2011	Increase 2006-2011
Andrew	4.00%	3.90%	4.60%	7.80%	7.30%	6.30%	58%
Atchison	3.90%	4.30%	4.60%	7.50%	7.60%	7.30%	87%
Buchanan	4.50%	4.40%	5.00%	8.60%	8.30%	7.40%	64%
Clinton	4.90%	5.10%	5.70%	10.00%	10.40%	10.00%	104%
Dekalb	5.30%	5.10%	6.10%	9.60%	8.90%	8.30%	57%
Gentry	4.00%	4.00%	4.30%	6.40%	7.30%	6.70%	68%
Holt	4.00%	5.00%	4.90%	7.20%	7.30%	6.90%	73%
Nodaway	3.40%	3.70%	4.10%	6.50%	6.80%	6.80%	100%
Platte	3.90%	3.90%	4.60%	7.80%	7.80%	7.20%	85%
Worth	3.80%	4.50%	5.30%	7.70%	7.00%	6.20%	63%

For the KCP&L GMO-MPS service area, Mercer County which experienced the smallest increase, saw a 49% increase in unemployment. Carroll County, Johnson County and Lafayette County experienced the greatest increases in unemployment - more than doubling in each county. For the KCP&L GMO-L&P service area, DeKalb County, which experienced the smallest increase, saw a 68% increase in unemployment. Clinton County, Nodaway County and Atchison County experienced the greatest increases in unemployment.

8 Q. DO THE UNEMPLOYMENT STATISTICS REPORTED BY THE BLS REFLECT THE 9 ACTUAL LEVEL OF UNDER-EMPLOYMENT?

A. No. The unemployment statistics reported by the BLS are limited in that the
 derivation of those statistics treats a person who works any number of hours for pay
 as employed. For example, a person who works only one hour for pay would be
 treated as employed and would not be reflected in the unemployment rate. To gauge
 under-employment requires consideration of additional information. Measures of

- workers' wages or annual pay can provide additional information on the level of
 under-employment because they reflect changes over time in total worker
 compensation.
- 4 Q. PLEASE COMMENT ON HOW WAGES HAVE CHANGED.
- Based on data obtained from the US Bureau of Labor Statistics, between 2005 and 5 A. 6 2011 for counties served by KCP&L's GMO-MPS, the growth in average annual 7 pay ranged from an increase of about 1.8% in Mercer County to 25.5% in Harrison 8 County. The un-weighted average growth in annual pay for KCP&L's GMO-MPS 9 service area counties was 16.8% for the same period. Between 2005 and 2011 for 10 counties served by KCP&L's GMO-L&P, the growth in average annual pay ranged 11 from an increase of about 13.9% in Gentry County to 20.3% in Atchison County. 12 The un-weighted average growth in annual pay for KCP&L's GMO-L&P service 13 area counties was 17.5% for the period.

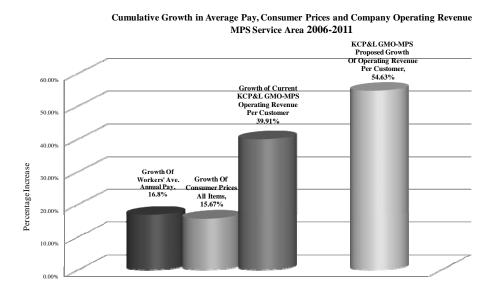
14 Q. HOW DOES THE GROWTH IN PAY COMPARE TO THE GROWTH IN COMPANY 15 REVENUE?

16 A. From 2006, when new rates were implemented in ER-2005-0436, through 2011, 17 KCP&L's GMO-MPS current revenue per customer grew 39.91% which is higher 18 than the growth in average annual pay for all KCP&L GMO-MPS service area 19 counties. If KCP&L GMO is granted the increase it has requested in this case for 20 the MPS system, the Company's revenue per customer will have grown 54.63% 21 over that period. Diagram 3, shown below, presents these comparisons. The 22 diagram illustrates that KCP&L's GMO-MPS growth rate of revenue per customer Direct Testimony of Barbara Meisenheimer Case No. ER-2012-0175

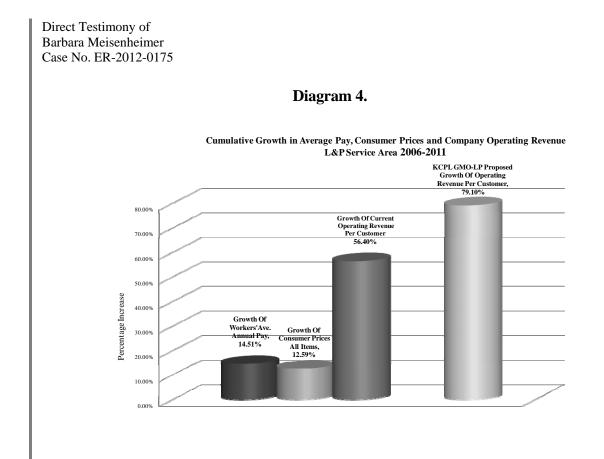
- is outpacing the average growth in workers' annual pay. This disparity will increase

substantially if the Company is granted the full increase it has requested.

Diagram 3.



From 2006, when new rates were implemented in ER-2005-0436, through 2011, KCP&L's GMO-L&P current revenue per customer grew 56.40% which is higher than the growth in average annual pay for all KCP&L GMO-L&P service area counties. If KCP&L GMO is granted the increase it has requested in this case for the L&P system, the Company's revenue per customer will have grown 79.10% over that period. Diagram 4, shown below, presents these comparisons. Similar to the results for KCP&L's GMO-MPS service area, KCP&L's GMO-L&P growth rate of revenue per customer is far outpacing the average growth in workers' annual pay and the disparity will worsen if the Company is granted the increase it has requested in this case.



1 Q. HOW DO RATE INCREASES THAT OUTPACE WAGE INCREASES IMPACT CONSUMERS?

A. As electric bills claim an even larger share of wages, many consumers find it more
difficult to make ends meet. Some customers might have to work extra hours or two
jobs to make ends meet. Some customers might have to make a choice between
paying utility bills or buying food and medicine.

6 Q. PLEASE COMMENT ON RECENT RATE INCREASES THAT HAVE IMPACTED KCP&L 7 GMO'S SERVICE AREA.

From 2006 to 2011, investor owned utility customers in portions of KCP&L GMO's
service area have been impacted by significant rate increases in a multitude of utility
services. In rate cases, KCP&L GMO increased companywide electric rates four
times for a total of almost \$167.5M on the MPS system and almost \$57M on the
L&P system. Missouri American Water increased companywide water rates four

1		times for a total of almost \$118.4M impacting communities such as Warrensburg,
2		Platte County and St. Joseph. Missouri Gas Energy, Atmos, Empire District Gas
3		and Laclede have also been granted significant rate increases since 2006.
4 5	Q.	HAVE CONSUMERS PREVIOUSLY EXPRESSED CONCERNS ABOUT THEIR ABILITY TO AFFORD UTILITY RATE INCREASES AND THE FAIRNESS OF RATES?
6	A.	Yes. Customers testifying in past public hearings and customers submitting
7		comments to the Commission have regularly voiced frustration and concern about
8		the burden of additional rate increases given the state of the economy. In the current
9		case the Commission should focus on ensuring rate affordability and fairness for
10		consumers.

11 Q. HOW CAN THE COMMISSION PROMOTE RATES THAT ARE FAIR AND AFFORDABLE?

12 A. The Commission can promote rate affordability by carefully scrutinizing the claimed 13 expenses underlying KCP&L GMO's request for a rate increase. Expenses 14 including operations and maintenance expenses, labor expenses and administrative 15 and general expenses make up the largest driver of revenue requirement. The rate of 16 return is another key factor in determining the Company's revenue requirement and 17 ultimately customer rates. In determining the return on investment, the Commission 18 typically recognizes that there is a range of rates of return that can allow a utility the 19 opportunity to earn a reasonable return on investment. To promote affordability the 20 Commission should adopt a rate of return at the bottom of the reasonable range. 21 Setting rates to produce a return at the lower end of the range can provide KCP&L 22 the opportunity to earn a reasonable return while also minimizing the rate increase

imposed on consumers. As I will discuss in rate design testimony, the structure of
 rates is also important in promoting rate affordability. By minimizing mandatory
 fixed charges, the Commission can promote affordability by providing customers a
 better ability to manage their electric bills by controlling usage.

5 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

6 A. Yes.