Exhibit No. 117

Staff – Exhibit 117
Robin Kliethermes
Rebuttal Testimony
File No. ER-2021-0312

Exhibit No.:
Issue(s): *Tariff*
Witness: *Robin Kliethermes*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *ER-2021-0312*
Date Testimony Prepared: *December 20, 2021*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF AND RATE DESIGN DEPARTMENT

REBUTTAL TESTIMONY

OF

ROBIN KLIETHERMES

THE EMPIRE DISTRICT ELECTRIC COMPANY,
d/b/a Liberty

CASE NO. ER-2021-0312

Jefferson City, Missouri
December 2021

REBUTTAL TESTIMONY

OF

ROBIN KLIETHERMES

THE EMPIRE DISTRICT ELECTRIC COMPANY,
d/b/a Liberty

CASE NO. ER-2021-0312

Q. Please state your name and business address.

A. Robin Kliethermes, 200 Madison Street, Jefferson City, MO 65101.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission ("Commission") as the Regulatory Compliance Manager of the Tariff and Rate Design Department of the Industry Analysis Division.

Q. Please describe your educational background and work experience.

A. Please refer to Schedule RK-r1 attached hereto.

Q. Have you previously filed testimony before this Commission?

A. Yes, I have. Please refer to Schedule RK-r1 attached hereto for a list of cases in which I have previously filed testimony.

Q. Have you previously filed testimony in this case?

A. No.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to respond to Empire District Electric Company's ("Empire") witness Gregory W. Tillman regarding the Company's requested Transmission Service ("TS") tariff.

EMPIRE'S REQUESTED TRANSMISSION SERVICE TARIFF

Q. What is Empire's requested Transmission Service Tariff?

A. Empire is requesting a new Transmission Service tariff that will take the place of the Company's existing Special Transmission Service Contract: Praxair (Schedule SC-P) tariff. Empire witness Mr. Tillman states[1] that the Company is proposing this change to ref nature of the service as transmission service and to eliminate the reference to the customer's former name.

Q. How many customers are currently served on Schedule SC-P?

A. Currently the only customer served on Schedule SC-P is Praxair. Schedule SC-P first became effective on March 3, 1993.

Q. Does Staff have concerns with Empire's requested Transmission Service tariff?

A. Yes. When Schedule SC-P first took effect on March 3, 1993, it was specifically based on the service contract dated November 19, 1992 between Praxair and the Company. The contract included specific provisions for curtailment, demand reduction, and other provisions reflected in the Schedule SC-P. Since March 3, 1993, Schedule SC-P has only been available to Praxair. In this case the Company is requesting to essentially open up Schedule SC-P by changing the name to Schedule TS and making the service available to any general service customer who has signed a service contract with the Company. However, the Company's requested draft tariff offers no provisions requiring the Company to file the service contract for Commission review.

Further, the tariff provisions for demand reduction and curtailment limits currently applicable to Schedule SC-P have also been removed from Schedule –TS. For Schedule –TS,

[1] Page 20, lines 13-14 Mr. Tillman direct testimony.

curtailment limits are set either by the Company's Interruptible Service tariff or by the Customer's curtailment contract. Again, the tariff does not require any contracts be filed with the Commission for review.

Q. Are there other changes to Schedule-TS that Staff is concerned with?

A. Yes. Schedule SC-P currently states that:

> MONTHLY CREDIT: A monthly credit of $4.01 on demand reduction per kW of contracted interruptible demand for substation metered Customers will be applied.

Whereas, Schedule-TS changes the existing monthly credit language to:

> MONTHLY CREDIT: If applicable, monthly credit according to the Customer's curtailment contract on demand reduction per kW of contracted interruptible demand for substation metered Customers will be applied.

Not only is Staff concerned that the requested tariff lacks any provisions requiring customer contracts to be filed for Commission review, but the Company is also requesting to bill customers a non-tariffed rate. Not only does this appear to be unlawful, in that it is not subject to Commission review and established in a general rate proceeding, it also implies that the monthly credit may be set at a different rate for different customers. If the monthly credit should in fact be different for different customers depending on curtailment time and length then at the very least a formula for how the monthly credit will be calculated for each customers should be provided in the tariff. As Schedule-TS is currently drafted, the Company has full discretion to adjust the value of the monthly credit for each customer served on the tariff without Commission review or approval of the rate.

Q. Has the Company provided testimony explaining how the monthly credit will be calculated for customers on the requested Schedule-TS?

A. Not at this time.

Q. What is Staff's recommendation regarding Empire's requested Schedule-TS?

A. Staff recommends that the Company add provisions requiring customer contracts be filed for Commission review and add either the value of the monthly credit or a formula describing how the monthly credit will be calculated for each customer. If the Company is unable to do either, than Staff recommends the Commission reject the Company's requested Schedule – TS as filed in its' direct testimony.

Q. Does this conclude your rebuttal testimony?

A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Request of The Empire District Electric Company d/b/a Liberty for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area	)))))	Case No. ER-2021-0312

AFFIDAVIT OF ROBIN KLIETHERMES

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW ROBIN KLIETHERMES, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Robin Kliethermes;* and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

ROBIN KLIETHERMES

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 16th day of December, 2021.

Notary Public

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2023
Commission Number: 15207377

ROBIN KLIETHERMES

Present Position:

I am the Regulatory Compliance Manager of the Tariff and Rate Design Department, Industry Analysis Division, of the Missouri Public Service Commission ("Commission"). I have held this position since July 16th, 2016. I have been employed by the Commission since March of 2012. In May of 2013, I presented on Class Cost of Service and Cost Allocation to the National Agency for Energy Regulation of Moldova ("ANRE") as part of the National Association of Regulatory Utility Commissioners ("NARUC") Energy Regulatory Partnership Program. I am also a member of the Electric Meter Variance Committee.

Educational Background and Work Experience:

I have a Bachelor of Science degree in Parks, Recreation and Tourism with a minor in Agricultural Economics from the University of Missouri – Columbia in 2008, and a Master of Science degree in Agricultural Economics from the same institution in 2010. Prior to joining the Commission, I was employed by the University of Missouri Extension as a 4-H Youth Development Specialist and County Program Director in Gasconade County.

Additionally, I completed two online classes through Bismarck State College: Energy Markets and Structures (ENRG 420) in December, 2014 and Energy Economics and Finance (ENRG 412) in May, 2015.

Previous Testimony of Robin Kliethermes

Case No.	Company	Type of Filing	Issue
ER-2012-0166	Ameren Missouri	Staff Report	Economic Considerations
ER-2012-0174	Kansas City Power& Light Company	Staff Report	Economic Considerations
ER-2012-0175	KCP&L Greater Missouri Operations Company	Staff Report	Economic Considerations & Large Power Revenues
ER-2012-0345	Empire District Electric Company	Staff Report	Economic Considerations, Non-Weather Sensitive Classes & Energy Efficiency
HR-2014-0066	Veolia Kansas City	Staff Report	Revenue by Class and Class Cost of Service
GR-2014-0086	Summit Natural Gas	Staff Report	Large Customer Revenues
GR-2014-0086	Summit Natural Gas	Rebuttal	Large Customer Revenues
EC-2014-0316	City of O'Fallon Missouri and City of Ballwin, Missouri v. Union Electric Company d/b/a Ameren Missouri	Staff Memorandum	Overview of Case
EO-2014-0151	KCP&L Greater Missouri Operations Company	Staff Recommendation	Renewable Energy Standard Rate Adjustment Mechanism (RESRAM)
ER-2014-0258	Ameren Missouri	Staff Report	Rate Revenue by Class, Class Cost of Service study, Residential Customer Charge
ER-2014-0258	Ameren Missouri	Rebuttal	Weather normalization adjustment to class billing units
ER-2014-0258	Ameren Missouri	Surrebuttal	Residential Customer Charge and Class allocations
ER-2014-0351	Empire District Electric Company	Staff Report	Rate Revenue by Class, Class Cost of Service study, Residential Customer Charge

cont'd Previous Testimony of
Robin Kliethermes

Case No.	Company	Type of Filing	Issue
ER-2014-0351	Empire District Electric Company	Rebuttal & Surrebuttal	Residential Customer, Interruptible Customers
ER-2014-0370	Kansas City Power & Light Company	Staff Report	Rate Revenue by Class, Class Cost of Service study, Residential Customer Charge
ER-2014-0370	Kansas City Power & Light Company	Rebuttal & Surrebuttal	Class Cost of Service, Rate Design, Residential Customer Charge
ER-2014-0370	Kansas City Power & Light Company	True-Up Direct & True-Up Rebuttal	Customer Growth & Rate Switching
EE-2015-0177	Kansas City Power & Light Company	Staff Recommendation	Electric Meter Variance Request
EE-2016-0090	Ameren Missouri	Staff Recommendation	Tariff Variance Request
EO-2016-0100	KCP&L Greater Missouri Operations Company	Staff Recommendation	RESRAM Annual Rate Adjustment Filing
ET-2016-0185	Kansas City Power & Light Company	Staff Recommendation	Solar Rebate Tariff Change
ER-2016-0023	Empire District Electric Company	Staff Report	Rate Revenue by Class, CCOS and Residential Customer Charge
ER-2016-0023	Empire District Electric Company	Rebuttal & Surrebuttal	Residential Customer Charge and CCOS
ER-2016-0156	KCP&L Greater Missouri Operations	Staff Report	Rate Revenue by Class, CCOS and Residential Customer Charge
ER-2016-0156	KCP&L Greater Missouri Operations	Rebuttal & Surrebuttal	Data Availability, Energy Efficiency Revenue Adj., Residential Customer Charge
ER-2016-0179	Ameren Missouri	Rebuttal	Blocked Usage
ER-2016-0285	Kansas City Power & Light Company	Rebuttal & Surrebuttal	Clean Charge Network Tariff, Rate Design
GR-2017-0215	Spire (Laclede Gas Company)	Staff Report, Rebuttal & Surrebuttal	Tariff Issues, Rate Design and Class Cost of Service

cont'd Previous Testimony of
Robin Kliethermes

Case No.	Company	Type of Filing	Issue
GR-2017-0216	Spire (Missouri Gas Energy)	Staff Report, Rebuttal & Surrebuttal	Tariff Issues, Rate Design and Class Cost of Service
EC-2018-0103	Kansas City Power & Light Company	Staff Report	Customer Complaint
EO-2015-0055	Ameren Missouri	Rebuttal	Flex-Pay Program
GR-2018-0013	Liberty	Staff Report	Class Cost of Service and Rate Design Report
ER-2018-0145	Kansas City Power & Light Company	Staff Report & Rebuttal & Surrebuttal	Tariff Issues, Rate Design, Revenue, Class Cost of Service
ER-2018-0146	KCP&L Greater Missouri Operations	Staff Report & Rebuttal & Surrebuttal	Tariff Issues, Rate Design, Revenue, Class Cost of Service
EO-2018-0211	Ameren Missouri	Staff Rebuttal Report	MEEIA Margin Rates
GO-2019-0059	Spire Missouri West	Staff Recommendation & Rebuttal	Weather Normalization Adjustment Rider (WNAR)
GO-2019-0058	Spire Missouri East	Staff Recommendation & Rebuttal	Weather Normalization Adjustment Rider (WNAR)
ET-2018-0132	Ameren Missouri	Surrebuttal	Risk Sharing Mechanism
ER-2019-0291	Ameren Missouri	Staff Recommendation	MEEIA EEIC rates
GR-2019-0077	Ameren Missouri	Staff Report, Rebuttal & Surrebuttal	Tariff Issues, Rate Design, Revenue, Class Cost of Service
EO-2019-0132	KCPL and GMO	Staff Rebuttal Report	MEEIA DSIM mechanism, Tariff Issues
ER-2019-0335	Ameren Missouri	Staff Report, Rebuttal and Surrebuttal	Cost of Service and Class Cost of Service
ER-2019-0374	Empire District Electric Company	Staff Report, Rebuttal and Surrebuttal	Class Cost of Service and Estimated Bills
ER-2019-0374	Empire District Electric Company	Supplemental and Surrebuttal Supplemental	Estimated Bills and Billing Determinants
EU-2020-0350	Evergy Missouri Metro and Evergy Missouri West	Rebuttal Testimony	Lost Revenue Recovery

cont'd Previous Testimony of
Robin Kliethermes

Case No.	Company	Type of Filing	Issue
ER-2021-0158	Ameren Missouri	Staff Recommendation	Rider Energy Efficiency Investment Charge
GR-2021-0108	Spire Missouri, Inc.	Staff Report, Rebuttal and Surrebuttal	Class Cost of Service, CCN Disallowance, Billing Determinant adjustments
ET-2021-0151	Evergy Missouri Metro & Evergy Missouri West	Staff Rebuttal Report	Electric Vehicle Charging Programs
EO-2021-0416	Evergy Missouri West	Staff Recommendation Report	First Prudence Review of MEEIA Cycle 3
EO-2021-0417	Evergy Missouri Metro	Staff Recommendation Report	First Prudence Review of MEEIA Cycle 3
ER-2021-0240	Ameren Missouri	Staff CCOS Report, Rebuttal and Surrebuttal	Seasonal Proration, Rate Switching Tracker, Tariff Review, Energy Efficiency
GR-2021-0241	Ameren Missouri	Staff CCOS Report	Rate Design, Class Cost of Service and Tariff Review