

# Exhibit No. 406

MECG – Exhibit 406  
Kavita Maini  
Rebuttal Testimony in ER-2022-0129  
File Nos. ER-2022-0129 & ER-2022-0130

Exhibit No.:  
Issue: Class Cost of Study, Revenue Allocation, Rate Design  
Witness: Kavita Maini  
Type of Exhibit: Rebuttal Testimony  
Sponsoring Parties: MECC  
Case No.: ER-2022-0129  
Date Testimony: July 13, 2022  
Prepared:

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

\_\_\_\_\_)  
**In the Matter of Evergy Metro, Inc. d/b/a** )  
**Every Missouri Metro's Request for** ) **File No. ER-2022-0129**  
**Authority to Implement A General Rate** )  
**Case Increase for Electric Service** )

Rebuttal Testimony and Schedules of

**Kavita Maini**

On behalf of

**MIDWEST ENERGY CONSUMERS GROUP**

July 13, 2022



*Protecting Your Bottom Line*

**KM ENERGY CONSULTING, LLC**

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

\_\_\_\_\_  
In the Matter of Evergy Metro, Inc. d/b/a )  
Every Missouri Metro's Request for )  
Authority to Implement A General Rate ) Case No. ER-2022-0129  
Case Increase for Electric Service )  
\_\_\_\_\_

STATE OF WISCONSIN )  
 ) SS  
COUNTY OF WAUKESHA )

**AFFIDAVIT OF KAVITA MAINI**

Kavita Maini, being first duly sworn, on her oath states:

1. My name is Kavita Maini. I am a consultant with KM Energy Consulting, LLC. having its principal place of business at 961 North Lost Woods Road, Oconomowoc, WI 53066. I have been retained by the Midwest Energy Consumers Group ("MECG") in this proceeding on its behalf.
2. Attached hereto and made a part hereof for all purposes are my rebuttal testimony and schedules which were prepared in written form for introduction into evidence in Missouri Public Service Commission Case No. ER-2022-0129
3. I hereby swear and affirm that the testimony and schedules are true and correct and that they show the matters and things that they purport to show.

Kavita Maini  
Kavita Maini

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

---

**In the Matter of Evergy Metro, Inc. d/b/a )  
Every Missouri Metro's Request for )  
Authority to Implement A General Rate )  
Case Increase for Electric Service ) File No. ER-2022-0129  
)**

---

**TABLE OF CONTENTS**

	<b>Page</b>
<b>I. INTRODUCTION</b>	<b>2</b>
<b>II. SUMMARY</b>	<b>3</b>
<b>III. RESPONSES REGARDING CLASS COST OF SERVICE METHODS</b>	<b>4</b>
<b>IV. RESPONSES REGARDING REVENUE ALLOCATION</b>	<b>10</b>
<b>V. RESPONSE TO STAFF REGARDING LPS AND LGS RATE DESIGN</b>	<b>13</b>

**SCHEDULES**

**SCHEDULE KM-1R: STAFF'S COSS RESULTS AFTER MECG ADJUSTMENTS**

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

In the Matter of Evergy Metro, Inc. d/b/a )  
Every Missouri Metro's Request for )  
Authority to Implement A General Rate ) **File No. ER-2022-0129**  
Case Increase for Electric Service )  
\_\_\_\_\_ )

**Rebuttal Testimony of Kavita Maini**

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND OCCUPATION.**

3 A. My name is Kavita Maini. I am the principal and sole owner of KM Energy  
4 Consulting, LLC.

5 **Q. PLEASE STATE YOUR BUSINESS ADDRESS.**

6 A. My office is located at 961 North Lost Woods Road, Oconomowoc, WI 53066.

7 **Q. ARE YOU THE SAME KAVITA MAINI WHO HAS PREVIOUSLY FILED**  
8 **DIRECT TESTIMONY IN THIS CASE?**

9 A. Yes, I filed direct testimony on behalf of the Midwest Energy Consumers Group  
10 ("MECG"). My direct testimony provided recommendations regarding Evergy Metro,  
11 Inc.'s ("Metro" or "Company") class cost of service study ("COSS"), revenue  
12 allocation to classes and rate design for the Large General Service ("LGS") and Large  
13 Power Service ("LPS") rate schedules.

14 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

15 A. The purpose of my rebuttal testimony is to address (a) issues related to Staff's COSS

1 methodology, (b) Staff's revenue allocation, and (d) Staff's rate design  
2 recommendations applicable to the LGS and LPS rate schedules. I also respond to  
3 Missouri Industrial Energy Consumers ("MIEC") witness Mr. Maurice Brubaker's  
4 recommendations related to the COSS. The fact that I do not address any particular  
5 issue should not be interpreted as my implicit approval of any position taken by Staff  
6 on that issue.

## 7 **II. SUMMARY**

### 8 **Q. PLEASE SUMMARIZE YOUR TESTIMONY AND RECOMMENDATIONS.**

9 A. The following is a summary of my testimony and recommendations:

#### 10 **Section III: Class Cost of Service Study (CCOS)**

- 11 1. Contrary to Staff's perspective, it is neither necessary nor appropriate to further weight the  
12 A&E allocator with an energy allocator. The A&E allocator is appropriately applied to all  
13 types of generation including coal, nuclear, natural gas and renewable generation. This is  
14 because by incorporating class contribution to average demands (i.e., energy usage) and  
15 maximum demands and further weighting by load factor, the A&E allocator reasonably  
16 considers all aspects of a utility's load profile characteristics which result in building  
17 generation infrastructure;
- 18 2. Staff appropriately utilizes the same allocator to allocate generation and transmission costs  
19 at the jurisdictional level. However, Staff inexplicably utilizes different allocators to  
20 allocate these costs at the retail level. Using the same allocator is appropriate and  
21 consistent because it recognizes that both generation and transmission are planned,  
22 designed and constructed to meet a utility's highest demands and contributions to these  
23 highest demands is the appropriate cost causative basis on which to allocate the related  
24 costs.
- 25 3. While Staff allocates costs and revenues based on its transmission demand allocator in the  
26 West COSS, this approach is not applied consistently in the Metro COSS. In Metro  
27 COSS's case, Staff allocates certain costs based on an energy allocator and revenues  
28 based on its demand allocator.
- 29 4. Staff incorporates energy weighting for allocating certain embedded distribution related  
30 services which is not mainstream or accepted as a method in the NARUC manual.
- 31 5. After correcting for these above-mentioned issues and contrary to Staff's results, the  
32 results show that at present rate revenues, the rate of return and indexed ROR is much

1 higher for the LPS class and similar to MECG and Metro’s COSS results shown in direct  
2 testimony.

3 6. As a result of these issues, the Commission should not rely on Staff’s COSS. Instead, the  
4 Commission should rely on MECG’s COSS results for cost causation and revenue  
5 allocation inferences.

6 7. While I continue to recommend that the Commission adopt MECG’s COSS method,  
7 given the similarity in results, I am not opposed to the method advocated by Metro or  
8 MIEC.

9 **Section IV: Revenue Allocation**

10 1. For reasons identified earlier, the Commission should not rely on Staff’s COSS to make  
11 determinations on revenue allocation to classes. Rather, the Commission should depend  
12 on MECG’s COSS results in making such determinations.

13 2. If Staff’s revenue requirement including true-up of a 3.36% increase were approved, using  
14 MECG’s COSS results as guidance and applying Staff’s \$20 million threshold approach  
15 results in an increase of 5.97% for the residential, CCN and lighting classes and 1.59% for  
16 all other classes respectively. On a comparative basis, I obtain similar results using my  
17 recommended revenue allocation method by applying 100% of the change from the  
18 Company’s original request to adjust the Company’s original multiplier of 136% to  
19 approximately 177%. Applying this multiplier to an average 3.36% jurisdictional rate  
20 increase yields an increase of 5.93% for the residential, CCN and lighting classes and  
21 1.61% for all other classes respectively.

22 **Section V: Rate Design**

23 I oppose Staff’s proposal of a default Time of Use (“TOU”) rate for the LPS and LGS rate  
24 schedules at the present time. While I am supportive of evaluating a time of use rate  
25 design, I cannot endorse the approach being proposed by Staff because there is no rate per  
26 se to evaluate and no information regarding an impact analysis of any proposed changes to  
27 the LPS and LGS classes. I am generally more supportive of a phased-in approach as  
28 articulated by Metro and discussed in my direct testimony.

29 **III. RESPONSES REGARDING COSS METHODS**

30 *A. Response to Staff’s COSS Method*

31 **Q. WHAT ISSUES DO YOU ADDRESS WITH RESPECT TO STAFF’S COSS**  
32 **METHODOLOGY?**

33 **A.** I address the following major issues:

34 1. Allocation of fixed production plant related costs to customer classes;

- 1 2. Allocation of transmission costs to customer classes; and
- 2 3. Allocation of distribution costs related to FERC account 369

3 While there could be other issues, I focused my analysis on the above-mentioned  
4 major issues.

5 **1. Allocation of Fixed Production Plant Related Costs**

6 **Q. WHAT METHOD DID STAFF USE TO ALLOCATE FIXED PRODUCTION**  
7 **PLANT-RELATED COSTS TO CLASSES?**

8 A. Staff's witness Ms. Sarah Lange's direct testimony indicates that she used a  
9 combination of the Average and Excess 4NCP (A&E4NCP) allocator and an energy  
10 allocator. Her workpapers shows that she calculated a weighted allocator which  
11 essentially consisted of allocating (a) non-renewable fixed generation related costs  
12 using the A&E4NCP allocator and (b) renewable fixed generation related costs using  
13 the energy allocator.

14 **Q. DO YOU SUPPORT THIS APPROACH?**

15 A. No. First, I do not consider it good practice to mix and match production cost  
16 allocators based on generation type in order to allocate fixed production plant related  
17 costs, because such an approach will necessarily include more subjectivity and  
18 potential for analytical bias. Second, Ms. Lange appears to assume that the A&E  
19 allocator considers only peak demands and ignores the fact that the calculation of the  
20 allocator also includes average demand, which is energy usage. Therefore, energy  
21 based allocation is inherently included in the A&E4NCP calculation. Third, all  
22 generation acquired by the Company has capacity value including nuclear, hydro,  
23 natural gas, coal, solar and wind generation. By incorporating class contribution to



1 average demands and maximum demands and further weighting by load factor, the  
2 A&E allocator reasonably considers all aspects of a utility's load profile  
3 characteristics which result in building generation infrastructure. Consequently, the  
4 A&E approach is an appropriate allocator to use in order to allocate all fixed  
5 production plant related cost and the additional weighting depending on a specific  
6 resource type is neither necessary nor required. Thus, I recommend that Staff's  
7 composite allocator should be rejected.

## 8 **2. Allocation of Transmission Costs**

### 9 **Q. HOW DID STAFF ALLOCATE TRANSMISSION COSTS TO CLASSES?**

10 A. Staff allocated transmission costs on the basis of classes' 12 coincident peaks or 12CP.  
11 Ms. Lange did not provide a rationale for using a different allocator for transmission  
12 compared to generation.

### 13 **Q. IS THIS APPROACH CONSISTENT WITH HOW STAFF ALLOCATES** 14 **TRANSMISSION COSTS AT THE JURISDICTIONAL LEVEL?**

15 A. No. Staff uses the same allocator for allocating transmission costs, as fixed production  
16 plant related costs at the jurisdictional level. Such an approach is appropriate and  
17 consistent because it recognizes that both generation and transmission are planned,  
18 designed and constructed to meet a utility's highest demands and contributions to  
19 these highest demands is the appropriate cost causative basis on which to allocate the  
20 related costs. In Metro's case, these peaks occur in the summer months and Staff  
21 utilizes the 4CP method to allocate generation and transmission costs at the

1 jurisdictional level.<sup>1</sup> Missouri utilities including Empire, Ameren and Every all utilize  
2 the same allocator for fixed production plant and transmission costs to classes.  
3 Therefore, it is unclear why Staff has an inconsistent view when it comes to allocating  
4 these costs at the retail level. I continue to support and recommend the using the same  
5 demand allocator for generation and transmission related costs to classes, as has been  
6 done by the Company, Staff at the jurisdictional level and other Missouri utilities such  
7 as Ameren and Empire District Electric.

8 **Q. ARE THERE OTHER ISSUES RELATED TO THE ALLOCATION OF**  
9 **TRANSMISSION COSTS WITH STAFF’S ANALYSIS?**

10 A. Yes. There are two additional issues:

11 First, similar to all allocators, the cost allocation factors to classes should sum  
12 up to 1. However, Staff’s transmission allocator totals more than 17 times more than  
13 1.00 as shown in Figure 1R.

14 **Figure 1R: Staff’s Transmission Demand Allocator**

Description	Residential	SGS	MGS	LGS	LPS	Lighting	Other	Total
Staff's Transmission Allocator	0.4055971	1.4055971	2.4055971	3.4055971	4.4055971	5.4055971		17.4335825688

15  
16 Second, while Ms. Lange indicated that all costs, expenses, and revenues are  
17 allocated on the basis of her preferred 12CP allocator, the COSS model shows this is  
18 not the case in certain instances. For example, while costs booked under FERC  
19 account 565, “transmission of electricity by others”, were allocated on the basis of an  
20 energy allocator, revenues booked under FERC account 456 “Other electric revenue

---

<sup>1</sup> Staff witness Mr. Alan Bax’s direct testimony on pages 8-11 explains why reliance on the summer peak demands for allocating fixed transmission and production related costs is most reasonable and valid compared to other peak demands.

1 transmission for others” were allocated based on her transmission demand allocator.  
2 Aside from the issue of allocating transmission costs on an energy basis, it is not  
3 reasonable to be inconsistent by allocating costs on the basis of energy and revenue on  
4 the basis of demand.

5 **3. Allocation of distribution costs related to FERC account 369**

6 **Q. HOW DID STAFF ALLOCATE DISTRIBUTION COSTS RELATED TO**  
7 **FERC ACCOUNT 369?**

8 A. FERC account 369 refers to service drops. Staff calculated a weighted allocator based  
9 on energy usage and number of customers.

10 **Q. DO YOU SUPPORT THIS WEIGHTED APPROACH?**

11 A. No, I do not support this approach. I am not aware of a mainstream embedded cost  
12 method that utilizes an energy based weighting to allocate distribution costs related to  
13 services or any other components of distribution costs for that matter. The NARUC  
14 manual identifies on page 87 that costs booked under FERC account 369 (services)  
15 can be classified as customer related. Thus, I support and recommend the  
16 classification and allocation based on customer count.

17 **Q. DID YOU RUN STAFF’S COSS MODEL TO CORRECT FOR THE ABOVE**  
18 **MENTIONED ISSUES?**

19 A. Yes. While there could be other issues in the model as I did not conduct an exhaustive  
20 analysis, I made the following adjustments in Staff’s COSS model in order to address  
21 the above mentioned issues:

- 22 • I used the A&E4NCP allocator to allocate all fixed production related costs;

- I replaced Staff’s 12CP transmission allocator with the A&E4NCP allocator and allocated all transmission costs on this basis;
- I used Staff’s customer count allocator to allocate costs related to services (FERC 369)

**Q. WHAT DO THE RESULTS SHOW?**

A. Figure 2R shows a comparison of the Rate of Return (“ROR”) and indexed ROR on a present rate revenue basis between Staff’s COSS and Staff’s revised COSS after making adjustments to address the above-mentioned issues of concern in Staff’s COSS model. The findings indicate that the biggest difference is regarding the results for the LPS class. For a system wide ROR of 4.38% on a rate revenue basis (i.e., excluding other revenues), while Staff’s COSS results show an ROR at present rate revenue of 4.98% for the LPS class, Staff’s COSS results after making corrections show an ROR of 7.38%.

**Figure 2R: Earned and Indexed Rate of Return (ROR) at Present Rates**

	STAFF'S COSS AFTER MECG ADJUSTMENTS		STAFF'S COSS RESULTS	
	Earned ROR	Indexed ROR	Earned ROR	Indexed ROR
Residential	0.7573%	17.27	1.94%	44.24
Small General Service	9.2656%	211.27	8.99%	204.96
Medium General Service	8.2312%	187.68	8.28%	188.79
Large General Service	8.4580%	192.85	8.00%	182.42
Large Power Service	7.3821%	168.32	4.98%	113.64
Lighting	-0.2878%	-6.56	-6.43%	-146.71
CCN	-21.1315%	-481.82	-21.16%	-482.38
<b>On a Rate Revenue Basis</b>	<b>4.3857%</b>	<b>100.00</b>	<b>4.3857%</b>	<b>100.00</b>

The same conclusions can be drawn from the corrected results here for the LPS class and various other classes as the results identified by Metro and MECG in direct testimony. That is, these results also confirm that the residential and CCN classes have indexed ROR below 100 (or negative) and are therefore paying rates that are significantly below their costs to serve. Conversely, classes with indexed rate of return

1 above 100 are currently paying rates that are significantly above the cost to serve those  
2 classes such as Small General Service, Medium General Service, Large General  
3 Service and Large Power Class respectively. The one notable difference is that the  
4 results for the lighting class show negative indexed RORs compared to less than 100  
5 but positive indexed ROR in the COSS results in direct testimony.

6 ***B. Response to MIEC's COSS Method***

7 **Q. WHAT COSS DOES MIEC SUPPORT?**

8 A. MIEC witness Mr. Brubaker supports Metro's COSS method. As mentioned in my  
9 direct testimony, except for the lighting class, Metro's COSS results are substantially  
10 similar to MECG's COSS. While I continue to recommend that the Commission adopt  
11 MECG's A&E4NCP method for allocating generation and transmission costs, given  
12 the similarity in results for all of the remaining classes, I am not opposed to MIEC's or  
13 Metro's COSS.

14 **IV. RESPONSE TO STAFF REGARDING REVENUE ALLOCATION**

15 **Q. WHAT IS STAFF'S REVENUE ALLOCATION PROPOSAL?**

16 A. Ms. Lange relies on her COSS results to recommend a two-step process if an increase  
17 is ordered in excess of \$20 million:

- 18 • For the first \$20 million, apply a 1% increase to SGS, MGS and LGS, 3% to  
19 residential and 5% to the LPS class.
- 20 • Any additional increases should be applied as an equal percentage increase to the  
21 current rate revenues of each class

22 If the amount is lower than \$20 million, she recommends an equal percent increase to  
23 the residential, lighting, LPS and other classes respectively.

1 If there is an overall decrease, she recommends allocating the decrease to the LGS,  
2 MGS and SGS classes respectively.

3 **Q. DO YOU SUPPORT MS. LANGE'S RECOMMENDATIONS?**

4 A. No. As an initial matter, since I do not support Staff's COSS method of allocating  
5 certain costs, I strongly oppose relying on her COSS results for revenue allocation  
6 purposes to classes. With regards to the revenue allocation method itself, Ms. Lange  
7 does not specify why she utilizes a threshold of \$20 million to make revenue neutral  
8 shifts. If the Commission were to adopt such a threshold, then I recommend that  
9 MECG's COSS results be used as guidance in the first instance.

10 Using MECG's COSS results and applying Staff's \$20 million threshold, I  
11 arrive at the revenue allocation results as shown in Table 3R: Assuming that the  
12 Commission authorizes an increase of over \$28 million or 3.36% as estimated by Staff  
13 (after incorporating a true-up amount), for the first \$20 million, I applied a 5%  
14 increase for all to the residential, lighting and CCN classes respectively since these  
15 classes have a relative ROR less than 100. The remaining amount to cover the first  
16 \$20 million is then applied as an equal percent increase to the LGS, SGS, MGS and  
17 LPS classes respectively since these classes have a relative ROR greater than 150.  
18 This resulting amount in the first step is 0.62% for the SGS, LGS, MGS and LPS  
19 classes respectively. The additional incremental amount of approximately \$8.1 million  
20 is allocated as an equal percent to all classes. The resulting increase for the  
21 residential, lighting and CCN class is 5.97% and all other classes is 1.59%.

**Figure 3R: Revenue Allocation to Classes Using Corrected COSS Results**

	Rate Revenues	First \$20 Million	1st Step % Increase	Incremental	Inc % Increase	Total \$ Increase	Total % Increase
Residential	\$328,711,726	\$16,435,586	5.00%	\$3,191,863	0.97%	\$19,627,450	5.97%
Small General Service	\$70,954,430	\$436,539	0.62%	\$688,983	0.97%	\$1,125,522	1.59%
Medium General Service	\$123,495,391	\$759,791	0.62%	\$1,199,167	0.97%	\$1,958,958	1.59%
Large General Service	\$182,792,223	\$1,124,608	0.62%	\$1,774,953	0.97%	\$2,899,561	1.59%
Large Power Service	\$120,912,681	\$743,901	0.62%	\$1,174,089	0.97%	\$1,917,990	1.59%
Lighting	\$9,888,230	\$494,412	5.00%	\$96,017	0.97%	\$590,428	5.97%
CCN	\$103,270	\$5,164	5.00%	\$1,003	0.97%	\$6,166	5.97%
						\$0	
	\$836,857,951	\$20,000,000	2.39%	\$8,126,075	0.97%	\$28,126,075	3.36%

**Q. HOW DOES THIS REVENUE ALLOCATION RESULT COMPARE TO APPLYING THE METHOD YOU RECOMMENDED IN DIRECT TESTIMONY?**

**A** The results of applying my recommended approach is shown in Figure 4R. For an average increase of 3.36%, the percent change between 5.65% and 3.36% is 40.5%. Adding 50% and 100% of the change to the initial multiplier of 136% results in 156.27% and 176.53% respectively. Using this multiplier to the average increase of 3.36% yields a 5.25% increase (at 50%) and 5.93% increase (at 100%) for the residential, other and lighting classes, with the remaining amount allocated on an equal percent basis to all other classes (i.e., 2.08% and 1.61%). As can be observed, the application of Staff’s threshold method is comparable to applying all of the percent change from the original request to adjust the multiplier to approximately 177%.

**Figure 4R: Application of Staff’s Revenue Requirement Increase to MECG Revenue Allocation Method**

	50% of Change from Original Request	100% of Change from Original Request
Residential, Lighting, Other	5.25%	5.93%
SGS, MGS, LGS, LPS	2.08%	1.61%

If lower rate increases are approved (such as lower than \$20 million), the 5% increase should continue to be applied to the residential, CCN and lighting classes

1           respectively to focus on restoring equity amongst classes. Any incremental or  
2           decremental amounts after applying the 5% increases to these classes can then be  
3           applied to the remaining classes on an equal percent basis.

4   **Q.   DID YOU REVIEW MIEC’S WITNESS MR. BRUBAKER’S DIRECT**  
5   **TESTIMONY REGARDING REVENUE ALLOCATION TO CLASSES?**

6   A    Yes, I did. Mr. Brubaker’s approach essentially consists of getting classes closer to  
7           cost of service and is generally consistent with my perspective that the smaller the rate  
8           increase, the larger should be the revenue neutral shifts.

9   **V.   RESPONSE TO STAFF REGARDING RATE DESIGN**

10 **Q.   WHAT IS STAFF’S PROPOSED APPROACH FOR LPS AND LGS RATE**  
11 **DESIGN?**

12 A.   Staff would like Metro to offer default Time of Use (TOU) rate design for all classes  
13           except lighting, RTP and special customer rate schedules. I interpret Staff’s proposal  
14           to mean that customers on LGS and LPS rate schedules will need to opt out of a yet to  
15           be determined TOU rate if they do not prefer to be on this rate. It is not clear but I am  
16           assuming that customers can opt to continue receiving service on their current rate  
17           schedules in the event they opt-out.

18 **Q.   DO YOU SUPPORT STAFF’S PROPOSAL?**

19 A.   No, I do not support Staff’s proposal at the present time. While I am supportive of  
20           evaluating a time of use rate design, I cannot endorse the approach being proposed by  
21           Staff because there is no rate per se to evaluate and no information regarding an  
22           impact analysis of any proposed changes to the LPS and LGS classes. I am generally  
23           more supportive of a phased-in approach as articulated by Metro and discussed in my



1 direct testimony. We need to take a more systematic and measured approach with full  
2 vetting in order to mitigate rate impacts, ensure proper pricing signals and confirm that  
3 there are no unintended consequences with regards to rate switching or other revenue  
4 requirement recovery issues for Metro. Therefore, I oppose Staff's proposal at the  
5 current time.

6 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

7 A Yes.

## SCHEDULE KM-1R: STAFF'S COSS RESULTS AFTER MECG ADJUSTMENTS

Description	MO Adjusted Jurisdictional	Residential	SGS	MGS	LGS	LPS	Lighting	Other	Total
TOTAL RATE BASE	\$2,996,874,524	\$1,477,820,581	\$216,969,517	\$381,924,445	\$533,717,051	\$333,628,179	\$48,426,433	\$4,388,316	\$2,996,874,522
TOTAL EXPENSES	\$705,422,557	\$317,520,586	\$50,850,966	\$92,058,419	\$137,650,583	\$96,283,765	\$10,027,585	\$1,030,586	\$705,422,490
TOTAL REVENUE (RATE REVENUE + OTHER REVENUE)	\$906,329,532	\$353,254,922	\$75,830,158	\$133,358,763	\$199,244,774	\$133,922,590	\$10,607,767	\$110,558	\$906,329,532
OTHER REVENUE	\$69,471,580	\$24,543,196	\$4,875,728	\$9,863,372	\$16,452,551	\$13,009,909	\$719,537	\$7,288	\$69,471,581
RATE REVENUE	\$836,857,952	\$328,711,726	\$70,954,430	\$123,495,391	\$182,792,223	\$120,912,681	\$9,888,230	\$103,270	\$836,857,951
CURRENT RATE OF RETURN (TOTAL REVENUE)	6.7039%	2.4180%	11.5128%	10.8137%	11.5406%	11.2817%	1.1981%	-20.9654%	27.7995%
CURRENT RATE OF RETURN (ONLY RATE REVENUE)	4.3857%	0.7573%	9.2656%	8.2312%	8.4580%	7.3821%	-0.2878%	-21.1315%	12.6749%

1