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Service Commission

Exhibit No.:

Issues: Revenue Requirement

Witness: Seoung Joun Won, Ph.D.

Sponsoring Party: MO PSC Staff

Type of Exhibit: True-up Rebuttal Testimony

Case No.: ER-2014-0370

Date Testimony Prepared: July 14, 2015

# MISSOURI PUBLIC SERVICE COMMISSION REGULATORY REVIEW DIVISION

TRUE-UP REBUTTAL TESTIMONY

OF

SEOUNG JOUN WON, Ph.D.

#### KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2014-0370

Jefferson City, Missouri July 2015

\*\* Denotes Highly Confidential Information \*\*

Staff Exhibit No. 258-NP
Date 7/20/15 Reporter Jenni
File No. ER-2014-6370

NP

#### BEFORE THE PUBLIC SERVICE COMMISSION

#### OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light ) Company's Request for Authority to ) Implement a General Rate Increase for ) Electric Service )	Case No. ER-2014-0370							
AFFIDAVIT OF SEOUNG JOUN WON, Ph.D.								
State of Missouri ) ) ss. County of Cole )								
COMES NOW Seoung Joun Won, Ph.D. a mind and lawful age; that he contributed to the att the same is true and correct according to his best known Further the Affiant sayeth not.  Seoung Joun Won, Ph.D.	and on his oath declares that he is of sound ached True-Up Rebuttal Testimony and that							
<u>JURAT</u>								
Subscribed and sworn before me, a duly confor the County of Cole, State of Missouri, at my off . 2015.  NOTARY PUBLIC	stituted and authorized Notary Public, in and ice in Jefferson City, on this \( \begin{array}{c} \AW\\ \AW\\ \end{array} \) day of \( \begin{array}{c} \AW\\ \AW\\ \BW\\ \BW\\\ \BW\\\ \BW\\\ \BW\\ \BW\\ \BW\\ \BW\\ \BW\\\ \W\\\ \							

1	TRUE-UP REBUTTAL TESTIMONY
2	$\mathbf{OF}$
3	SEOUNG JOUN WON, Ph.D.
4	KANSAS CITY POWER & LIGHT COMPANY
6	CASE NO. ER-2014-0370
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3		SEOUNG JOUN WON, Ph.D.
4		KANSAS CITY POWER & LIGHT COMPANY
5		CASE NO. ER-2014-0370
6	Q.	Please state your name and business address.
7	A.	Seoung Joun Won, 200 Madison Street, Governor Office Building, Jefferson
8	City, Missou	ri.
9	Q.	By whom are you employed and in what capacity?
10	A.	I am a Regulatory Economist III with the Missouri Public Service Commission
11	("Commission	on").
12	Q.	Are you the same Dr. Seoung Joun Won who filed testimony as part of the
13	Staff's Cost	of Service Report on April 3, 2015, and true-up direct testimony on July 7, 2015?
14	A.	Yes, I am.
15	EXECUTIV	<u>E SUMMARY</u>
16	Q.	What is the purpose of your True-up Rebuttal Testimony?
17	A.	The purpose of this testimony is to address the true-up revenue adjustment for
18	the Large Po	ower Service ("LPS") class of Kansas City Power & Light Company ("KCPL").
19	The true-up	period cut off is May 31, 2015.
20	Q.	Which revenue adjustment are you sponsoring testimony on?
21	A.	I am sponsoring the LPS annualization adjustment for customer changes
22	through May	31, 2015.

#### 

#### ANNUALIZATION OF CUSTOMER CHANGES

- Q. Are there any new known and measurable customer changes in the LPS class of KCPL during the true-up period?
- A. Yes. According to KCPL's response to Staff Data Request No. 0649, there is a LPS customer who terminated service after the update period ending December 31, 2014, and during the true-up period of May 31, 2015.
  - Q. When did KCPL terminate providing service to this customer?
- A. According to KCPL's response, the service for this customer terminated on March 18, 2015.
  - Q. Did Staff conduct a true-up revenue adjustment for the terminating customer?
- A. Yes. Staff annualized the usage of the customer and made the true-up revenue adjustment for the terminating customer. Attached is Schedule SJW-1 which is KCPL's employee Lisa Casteel confirmation email on the terminating customer.
- Q. Are there any other known and measurable usage and revenue true-up changes for the LPS class?
- A. Yes. There was a new customer added between December 31, 2014 and May 31, 2015. The information had been already accounted in my true-up direct testimony and workpaper.
  - Q. Please summarize your true-up rebuttal testimony.
- A. During the true-up period, there was a new customer who initiated service and a customer who terminated service in the LPS class. Staff accounted for this net annualization by increasing usage and revenues by approximately \*\* \_\_\_\_ \*\* million dollars.



### True-up Rebuttal Testimony of Seoung Joun Won, Ph.D.

	Q.	Does the appro	oximately ad	lditio	nal **	** r	nillion d	lollars i	n the LPS	class
impact	the	Non-Unanimous	Stipulation	and	Agreement	on	Certain	Issues	("Agreem	ent")
concer	ning	Class Cost-of-Ser	vice and Rat	e De	sign?					

- A. No. Staff continues to support the Agreement that the Commission should allocate any increase to the revenue requirement resulting from this case as an equal percentage increase to all classes.
  - Q. Does this conclude your true-up rebuttal testimony?
  - A. Yes, it does.



## Schedule SJW-1

Is Deemed

**Highly Confidential** 

In Its Entirety