

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

IN THE MATTER OF EVERGY METRO, INC
D/B/A EVERGY MISSOURI METRO'S REQUEST FOR
AUTHORITY TO IMPLEMENT A GENERAL RATE
INCREASE FOR ELECTRIC SERVICE
FILE NO. ER-2022-0129

IN THE MATTER OF EVERGY MISSOURI WEST, INC.
D/B/A EVERGY MISSOURI WEST'S REQUEST FOR
AUTHORITY TO IMPLEMENT A GENERAL RATE
INCREASE FOR ELECTRIC SERVICE
FILE NO. ER-2022-0130

TRANSCRIPTION OF VIDEO FILE
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1 Thereupon, the following proceedings were transcribed
2 from an audio file as follows:

3 * * * * *

4 JUDGE DIPPELL: I think we'll go ahead and go
5 on the record. Good morning. This is Judge Dippell.
6 I am going to preside over the hearing today and in
7 place of Judge Hatcher. It is September 2, 2022, and
8 this is the hearing in the matter of ER2022-0129 and
9 ER-2022-0130. And that is Evergy Missouri both Metro
10 and West rate cases. Let's see. Before we went on
11 the record, Mr. Stokes asked if he could introduce
12 new counsel for staff.

13 MR. STOKES: Thank you, Your Honor. May it
14 please the Commission. It's my privilege to
15 introduce Eric Vandergriff to the Commission. Eric
16 is originally from Georgia, he is an Air Force
17 veteran, and he joins staff counsel's office out of
18 the Golden Gate University School of Law.

19 JUDGE DIPPELL: Thank you. Welcome. And also,
20 we do not have a court reporter again today, so this
21 will be being recorded and transcribed after the
22 fact. So I will remind everybody to speak into the
23 microphones, speak slowly, speak clearly, and state
24 who you are for ease. And just so that we can get
25 that on the record and the court reporter can know

1 who is here, I'm going to go ahead and ask you to
2 make quick entries saying who's here and who's not,
3 and that will also help me figuring out the same
4 thing. So Everygy?

5 MR. FISCHER: Yes. Good morning. Jim Fischer
6 and Roger Steiner for Everygy today.

7 JUDGE DIPPELL: And staff?

8 MR. VANDERGRIFF: Eric Vandergriff for staff.

9 JUDGE DIPPELL: And public counsel.

10 MR. CLIZER: John Clizer.

11 JUDGE DIPPELL: MCEG?

12 MR. OPITZ: Tim Opitz for MCEG.

13 JUDGE DIPPELL: MIEC? I know some of the
14 parties were previously excused, but I'm just going
15 to run down the list. Renew Missouri.

16 MR. STOKES: Alissa Greenwald for Renew
17 Missouri.

18 JUDGE DIPPELL: Sierra Club? St. Joseph?
19 Dogwood? Nucor? Google? Velvet Tech? And anyone I
20 missed? Okay. I will try to shorten that as we go
21 today knowing that, like I said, some of those
22 parties were previously excused. Also, we discussed
23 there were some items that the commission was going
24 to take notice of or some previous decisions, and I
25 explained to counsel before we went on the record

1 just as a matter of course it's easier for the record
2 on appeal, for the transcript in general, and for the
3 public's access, if any of those items that the
4 commission takes official notice of or so forth are
5 marked as an exhibit and gone ahead and put in the
6 record that way, so that way on our electronic filing
7 system, we have complete record for anybody to see.
8 That just makes it simpler. So that's the reason for
9 marking those things as an exhibit and treating them
10 that way.

11 So I think that that is all I had
12 preliminarily. Were there any counsel preliminary
13 matters? Okay. Not seeing any, so we can go ahead
14 and with begin with our first witness. We're doing
15 the AMI issue today.

16 MR. FISCHER: Your Honor?

17 JUDGE DIPPELL: Yes.

18 MR. FISCHER: I believe at least some of the
19 parties might be interested in making many openings
20 regarding the AMI.

21 JUDGE DIPPELL: Yes. Thank you for the
22 reminder.

23 COMMISSIONER HOLSMAN: Judge, this is
24 Commissioner Holsman. I want to go on the record as
25 being here as well.

1 JUDGE DIPPELL: Yeah. I apologize,
2 Commissioner. I can't recall if we had other
3 commissioners on already this morning.

4 COMMISSIONER SILVEY: Judge, Commissioner
5 Silvey is here as well.

6 JUDGE DIPPELL: Thank you.

7 COMMISSIONER RUPP: Commissioner Rupp is here
8 as well.

9 JUDGE DIPPELL: Thank you, commissioners. I
10 will try to make note when the other commissioners
11 join us. All right. Then we can start with many
12 opening statements, and Evergy is already at the
13 podium.

14 MR. FISCHER: Thank you very much, Judge.
15 Welcome to the proceeding. Eric, welcome to the PSC.
16 I didn't catch your last name. It's?

17 MR. VANDERGRIFF: Vandergriff.

18 MR. FISCHER: Thank you. May it please the
19 Commission. This issue involves a disallowance by
20 staff and public counsel of certain rate based costs
21 associated with the deployment of AMI meters with
22 remote disconnect and reconnect capabilities. Both
23 staff witnesses, Eubanks and public counsel witness,
24 Mark, express concerns that the AMI meters installed
25 without remote disconnect and reconnect capability in

1 the period of 2014 through 2016 are now being
2 replaced by new AMI technology that has disconnect
3 and reconnect capabilities prior to the end of the
4 old technology's designed life. Staff recommends a
5 disallowance of \$5,784,812 for the Metro case and
6 \$2,663,582 for the West case. Those numbers come
7 from the staff's reconciliation. This is based upon
8 retirements that occurred during the test year and
9 the true-up period. Dr. Mark also recommends that
10 the commission disallow costs related to any second
11 generation AMI meters and associated installation
12 costs, as I understand his testimony.

13 Mr. Chuck Caisley, Evergy's senior vice
14 president of public affairs and the chief customer
15 officer is here to address their concerns. He does
16 so in his various re-filed testimonies. Mr. Caisley
17 explains that the company has embarked on a
18 thoughtful and pursuant approach to deploy AMI
19 technology over time to our customers. AMI meters
20 have already unlocked many benefits that are to our
21 customers and they're enjoying them today.

22 Now, contrary to the public counsel 's
23 assertion that the primary benefit of ATM technology
24 is the ability to use time of use rates, AMI meters
25 provide many more benefits to consumers, the company,

1 and its employees. Brad Lutz goes into these
2 benefits in some detail in his testimony. AMI with
3 disconnect and reconnect capabilities in particular
4 allows the company to utilize the electronic
5 communications and deploy remote procedures that
6 eliminate the need for the company personnel to make
7 physical contact with the customers. These changes
8 result in lower costs, better collections, fewer
9 on-premise incidents, and collection errors. In
10 addition, disconnection and reconnection fees can be
11 drastically reduced for customers with an AMI meter
12 with that capability. Once disconnected, the
13 customer no longer has to call back into the contact
14 center to request service restoration if they're
15 served by the newer technology. When a minimum
16 payment is received, a reconnection record is sent
17 immediately, and the customer service is typically
18 back on service within 15 minutes. This includes
19 afterhours, weekends, and holidays. These are clear
20 benefits to the customer if they have the newer AMI
21 technology that allows remote reconnection.

22 Now, there are many other benefits to the AMI
23 technology. For the company, it also reduces the
24 number of truck rolls for the disconnection and
25 reconnection. Over the long-term, this will reduce

1 the company's costs, and those savings will be passed
2 along to customers at lower rates. There is also
3 value to the company in having one uniform metering
4 system rather than having to do deal with two
5 different AMI metering technologies. Another major
6 benefit is that the new AMI technology reduces safety
7 risks for employees since they can avoid hostile
8 interactions with their customers at the premises.
9 Also, the new technology, these AMI meters have
10 onboard temperature sensing and alarm capability.
11 This alerts the company of issues on their premises
12 which may cause heating at the meter and will reduce
13 the potential for meter fires.

14 Evergy is using AMI data to disaggregate energy
15 usage so the company can better design and develop
16 programs for its customers, educate customers on
17 their usage, and market to customers for increased
18 programmed enrollment. One particular use mentioned
19 by Mr. Lutz is the detection of electric vehicle
20 charging. This capability will allow Evergy to
21 understand the impact of electric vehicle charging
22 demand on their system and create EV rate options
23 from this information. Mr. Caisley discusses the
24 decision to change out the older technology with AMI
25 meters with disconnect and reconnect capabilities.

1 This decision was based upon a solid business case
2 both in the initial decision not to deploy the new
3 technology when these differences were significantly
4 higher than they are today as well as the decision to
5 later change out old AMI meters prior to the end of
6 their designed life. This is because AMI meters with
7 disconnect and reconnect capabilities bring
8 additional cost savings and another benefits to
9 customers.

10 I'd encourage the judge or the commissioners to
11 ask Mr. Caisley about the economics of changing out
12 the existing older AMI meters with newer AMI meters
13 that have the new reconnection capability. From my
14 perspective, the issue for the Commission to think
15 about is fairly straightforward. Is it reasonable to
16 install newer technology with expanded capabilities
17 that benefit consumers or other stakeholders even
18 though the older technology may have some life left
19 in it? I doubt that there are very many people in
20 this room that still use a flip phone. Even though
21 those flip phones still technically would work and
22 make calls, we have all upgraded to newer smart
23 phones when the new technology advanced to provide
24 new information services, texting capability, and
25 high quality cameras all in one device. We all saw

1 the value of upgrading to the newer smart phones even
2 though the old phones still worked.

3 Mr. Brad Lutz provides testimony about the
4 business drives for the initial AMI deployment. At
5 the time of the initial deployment, AMI with
6 disconnect and reconnect capabilities were cost
7 prohibitive, more than double the cost of the meters
8 that were installed, and nearly 25 percent higher
9 than the prices available today for the new
10 technology. At the time the decision was made to
11 install AMI meters without the remote disconnect and
12 reconnect featuring, the business case did not
13 support the new technology due to the price of the
14 meters and the fact that the legacy KCP&L Metro
15 service area was replacing older AMR systems and not
16 the manual meter readers themselves. If the
17 Commission disallows \$8 million of investments in new
18 technology in this case, it will send a signal to
19 Evergy and the rest of the industry that public
20 utility shouldn't be upgrading their old meter
21 technology even though the new technology brings a
22 multitude of benefits and it makes good economic
23 sense to upgrade to the technology.

24 In conclusion, Evergy would respectfully
25 request that the Commission recognize the value to

1 consumers, the company and its employees of the newer
2 technology, and reject the proposed disallowances.
3 Thank you for your attention and thank you for your
4 attendance today. I'm happy to answer any questions,
5 but I have a couple witnesses that have a lot more in
6 the details.

7 JUDGE DIPPELL: Are there any commissioner
8 questions for Mr. Fischer? Not hearing any, so thank
9 you, Mr. Fischer. All right. Am I correct that
10 staff is next on the order?

11 MR. VANDERGRIFF: Yes, Your Honor.

12 JUDGE DIPPELL: Thank you.

13 MR. VANDERGRIFF: Good morning, Your Honor.
14 May it please the Commission. I am Eric Vandergriff,
15 staff counsel for the Missouri Public Service
16 Commission. And I'm joined today with Claire
17 Eubanks, staff witness for issue for advanced meter
18 infrastructure.

19 Staff recommends the Commission disallow
20 \$6.3 million from Evergy Metro and \$2.9 million from
21 Evergy Metro West. These numbers come from staff's
22 rebuttal. Evergy Missouri Metro and Evergy Missouri
23 West are prematurely replacing AMI meters with AMI
24 meters that have remote disconnect and reconnect
25 capabilities. Staff is also concerned that Evergy

1 Missouri is prioritizing customers in arrears for
2 those premature AMI replacements.

3 In summary, staff asks the Commission to order
4 its proposed disallowance and to take note of staff's
5 concerns over the premature replacements.

6 JUDGE DIPPELL: Thank you. Are there any
7 commissioner questions for staff counsel? Before you
8 leave the podium, just for our remote court reporter
9 transcribing, could you spell your name for us?

10 MR. VANDERGRIFF: V-a-n-d-e-r-g-r-i-f-f.

11 JUDGE DIPPELL: Thank you. And that's Eric
12 with a C?

13 MR. VANDERGRIFF: Eric with a C.

14 JUDGE DIPPELL: Thank you. And I believe next
15 is MECG.

16 MR. OPITZ: I have no opening for this issue.
17 Thank you.

18 JUDGE DIPPELL: Okay. Let's see, MIC, Renew,
19 Sierra Club, ChargePoint, St. Joseph. Dogwood -- do
20 we have someone from Dogwood? Nucor? Google?
21 Velvet? And public counsel?

22 MR. CLIZER: May it please the Commission.
23 John Clizer on behalf of the Missouri Office of the
24 Public Counsel. So let's start off by setting the
25 record straight. This issue is not about whether or

1 not AMI-SD -- those are service disconnect meters --
2 are good or bad technology. The company wants to
3 portray this as a replacement of old obsolete
4 technology. They liken it to replacing a flip phone
5 for your smart phone. The critical problem there is
6 that AMI-SDs existed at the time that the original
7 AMI meters were put in place. And the argument by
8 staff and OPC is not, "Boy, you shouldn't have put in
9 AMI-SDs now," it's, "Why did you not put in the
10 AMI-SDs in in 2014?" The company will tell you it
11 was more expensive. This is flat-out false. It
12 would have been less expensive. It would have saved
13 customers considerable money to have put in AMI-SDs
14 in 2014 and throughout the course of the AMI
15 replacement than to have put in AMIs and then
16 replaced it with additional AMI-SDs.

17 Let's just call this what it is. It's gold
18 plating, plain and simple. Evergy installed hundreds
19 of thousands of AMI meters and is now trying to rip
20 those meters out before they are fully recovered.
21 These meters, mind you, have an average service life
22 of 20 years based on their battery life, but the
23 average that we're seeing them removed it only in
24 five. Even in the best case scenario for the
25 company, a meter could only have been in for eight

1 years. That's less than 40 percent of its life.
2 Again, that's best case scenario. The vast majority
3 of these meters have been in for far shorter periods
4 of time.

5 Just think about it. Not a single one of these
6 meters has been able to collect 50 percent of their
7 value, 50 percent of their use before they're being
8 ripped out. This is completely unacceptable. It's
9 an effort by the company to build rate base brought
10 on by Evergy's fear of its former active investor,
11 Elliot Management. Let's think for a minute about
12 what customers have received for these AMI meters
13 that are now being replaced. The company might
14 disagree, but the literature clearly states that the
15 biggest benefit to residential customers for having
16 AMI meters is the ability to use time of use or TOU
17 rates. Even now the company still resists having
18 default time of use rates.

19 Despite the Commission sending clear signals
20 across multiple cases, despite 14 studies on the
21 topic that have told us how beneficial time of use
22 rates are, despite both Ameren and Empire moving to
23 default use time of rates, Evergy still resists. And
24 now the company is seeking to add insult to injury by
25 demanding its customers reimburse them for not just

1 one, but two underutilized meters. Keep in mind that
2 there are a number of states that have flat-out
3 rejected AMI rollout in its entirety. Utility
4 commissions in New Mexico, Massachusetts, Kentucky
5 and Virginia have all rejected proposals for AMI
6 meters. Evergy by contrast feels so entitled to
7 recover this second set of meters. It did not even
8 bother to address this issue in direct testimony.
9 And even, that still doesn't cover all of the
10 problems with this issue.

11 Evergy has already spent nearly \$300 million on
12 a billing system that was first acquired specifically
13 to utilize AMI and allow time of use rates. The
14 company has further specifically targeted customers
15 with high arrearages, as was mentioned by counsel for
16 staff. And what's more, instead of more efficiently
17 replacing meters based on neighborhoods by batch,
18 this adds a potential element of economic
19 discrimination to the already troubling mix. With
20 absolutely nothing else, the optics of this are
21 alarming.

22 As I said a moment ago, this is simple gold
23 plating. The OPC is asking the Commission to protect
24 customers by ensuring that one customer only has to
25 pay for one meter. One meter, one person. It's as

1 simple as that.

2 I also want to briefly mentioned counsel for
3 Evergy warned you that disallowing these meters would
4 send a signal that AMI-SD or potentially AMI
5 investment is not favored in Missouri. I want to let
6 you know that's not a concern. Ameren and Empire
7 have already fully deployed AMI-SD. It's Evergy
8 that's the problem child. They're the only ones who
9 ran out AMI first and are now seeking to replace
10 after the fact before the full value of the
11 investment can be recovered.

12 Today, you will hear testimony from both OPC
13 and staff who will together tell you why there's such
14 a major problem with Evergy's bid to prematurely
15 replace its AMI meters and create yet another
16 stranded asset. The OPC and staff are essentially in
17 lockstep on this issue, and I encourage you to ask
18 either the OPC or staff witnesses any questions you
19 might have. In particular, if there's anything that
20 I have said in this opening that gives you pause, ask
21 the OPC's witness and we can fully support everything
22 I've said. Just ask our witnesses. With that, I'll
23 pause, see if there's any questions.

24 JUDGE DIPPELL: Are there any commissioner
25 questions for public counsel? Not hearing any, thank

1 you, sir. All right. I believe that's all of the
2 opening statements. If I missed someone, please
3 speak up. So we can begin then with Evergy's first
4 witness.

5 MR. FISCHER: The company calls Bradley Lutz.

6 JUDGE DIPPELL: Please let me swear you in,
7 sir.

8 Do you solemnly swear that the testimony you're
9 about to give at this hearing will be the truth?

10 MR. LUTZ: I do.

11 JUDGE DIPPELL: Thank you. And if you could
12 spell your name for the court reporter.

13 MR. LUTZ: Brad Lutz, B-r-a-d, L-u-t-z.

14 JUDGE DIPPELL: Thank you. Go ahead.

15 MR. STEINER: This is Roger Steiner for the
16 company.

17 Thereupon,

18 BRAD LUTZ,
19 having been first duly sworn or affirmed, was examined
20 and testified as follows:

21 DIRECT EXAMINATION

22 BY MR. STEINER:

23 Q. Please state your name for the record.

24 A. My name is Brad Lutz, L-u-t-z.

25 Q. Mr. Lutz, where do you work?

1 A. I work at Evergy in the Regulatory Affairs
2 Department.

3 Q. And what is your position there?

4 A. I'm a director in that department.

5 Q. Mr. Lutz, did you cause repair and be prepared
6 direct testimony which has been -- that you caused to be
7 prepared direct testimony in the Evergy Missouri Metro
8 case which has been premarked as Exhibit 44?

9 A. I did.

10 Q. Excuse me. Direct testimony which has been
11 premarked as Exhibit 49.

12 A. Thank you. Yes, I did.

13 Q. Rebuttal testimony, a confidential version
14 which has been marked as Exhibit 50?

15 A. I did.

16 Q. Rebuttal testimony, a public version which has
17 been marked as Exhibit 51?

18 A. I did.

19 Q. Surrebuttal testimony which has been marked as
20 Exhibit 52?

21 A. I did.

22 Q. And in the Evergy Missouri West case, did you
23 pre-file direct testimony which has been marked as
24 Exhibit 117?

25 A. I did.

1 Q. Do you have any corrections to these
2 testimonies that I've mentioned?

3 A. I do not.

4 Q. Are the answers contained in the testimonies I
5 mentioned true and correct to the best of your
6 information and belief?

7 A. They are.

8 MR. STEINER: Your Honor, I'd like to move for
9 the admission of the direct rebuttal and surrebuttal
10 testimonies of Brad Lutz that I just mentioned.

11 JUDGE DIPPELL: Are there any objection to
12 Exhibits 49, 50, 51, 52 and 117? Seeing none, I will
13 admit those exhibits.

14 MR. STEINER: Thank you. I tender this witness
15 for cross-examination.

16 JUDGE DIPPELL: Thank you. Going off of the
17 order of cross that I have here, so if I, again, get
18 that wrong, please let me know. I'll just -- I'm
19 just going to read everybody. So I apologize if
20 we're extending things here a little.

21 ChargePoint? Google? Nucor? Velvet? St.
22 Joseph? Dogwood? Sierra Club? Renew?

23 MS. GREENWALD: No questions, Your Honor.

24 JUDGE DIPPELL: Thank you. MIEC and MECG?

25 MR. OPITZ: No thank you, Judge.

1 JUDGE DIPPELL: Staff?

2 MR. VANDERGRIFF: No questions, Your Honor.

3 JUDGE DIPPELL: Public counsel?

4 MR. CLIZER: No questions, Your Honor.

5 JUDGE DIPPELL: All right. Are there any
6 commissioner questions for Mr. Lutz? I'm not hearing
7 any. And I do not have any questions either, Mr.
8 Lutz, so you're getting off easy today. We
9 appreciate your participation. You may be excused.

10 MR. LUTZ: Thank you.

11 JUDGE DIPPELL: Every's next witness.

12 MR. FISCHER: This is Jim Fischer. I would
13 call Mr. Charles Caisley to the stand.

14 JUDGE DIPPELL: Could you please raise your
15 right hand so I can swear you in.

16 Do you solemnly swear or affirm that the
17 testimony you're about to give at this hearing will
18 be the truth?

19 MR. CAISLEY: I do, Your Honor.

20 JUDGE DIPPELL: Thank you. And could you spell
21 your name for the court reporter, please.

22 MR. CAISLEY: Yes. It is C-a-i-s-l-e-y.

23 JUDGE DIPPELL: Go ahead.

24 Thereupon,

25 CHARLES CAISLEY,

1 having been first duly sworn or affirmed, was examined
2 and testified as follows:

3 DIRECT EXAMINATION

4 BY MR. FISCHER:

5 Q. Please state your name and address for the
6 record.

7 A. Charles Caisley, C-a-i-s-l-e-y, 1200 Main
8 Street, Kansas City, Missouri.

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

10 A. I'm employed by Evergy and I'm their chief
11 customer officer.

12 Q. Did you cause to be filed in this proceeding
13 direct testimony which has been premarked as Exhibit 19
14 in the confidential version, direct testimony, the
15 public version, No. 20, rebuttal testimony marked 21,
16 and No. 22 was Caisley surrebuttal confidential, and 23,
17 Caisley surrebuttal public version that is in the Metro
18 case and in the Missouri West case, direct testimony
19 confidential 107, and direct testimony public version
20 108, did you cause those to be prepared and filed in
21 this case?

22 A. I did, yes.

23 Q. Did you have any corrections that you needed to
24 make?

25 A. Yes. To the rebuttal testimony, there is one

1 page, one word that I need to change. It is page 20,
2 line 22, the word sought needs to be replaced with the
3 word received.

4 Q. And what line was that on?

5 A. Line 22.

6 Q. Okay.

7 JUDGE DIPPELL: What was that exhibit number,
8 excuse me?

9 MR. FISCHER: That was the rebuttal testimony
10 and that was Exhibit 21.

11 JUDGE DIPPELL: Thank you.

12 BY MR. FISCHER:

13 Q. With that change, if I were to ask you the
14 questions that are contained in those various
15 testimonies, would your answers be the same and are they
16 correct as far as you know and accurate to the best of
17 your knowledge and belief?

18 A. Yes.

19 MR. FISCHER: With that, Judge, I think I'd
20 just tender Mr. Caisley for cross or any questions
21 from the bench or commissioners.

22 JUDGE DIPPELL: All right. Thank you. I'm
23 going to try to skip those that aren't here, and if I
24 miss somebody, please speak up. MIEC, any cross?
25 MECG?

1 MR. OPITZ: No thank you, Your Honor.

2 JUDGE DIPPELL: Staff?

3 MR. VANDERGRIFF: No questions, Your Honor.

4 JUDGE DIPPELL: OPC?

5 MR. CLIZER: No questions. Thank you.

6 JUDGE DIPPELL: Mr. Caisley, we're doing it
7 again. I have no questions. Oh, let me ask the
8 commissioners quickly.

9 Commissioners, do you have any questions for
10 Mr. Caisley?

11 COMMISSIONER SILVEY: Judge, this is
12 Commissioner Silvey.

13 JUDGE DIPPELL: Yes.

14 COMMISSIONER SILVEY: Just briefly.

15 Mr. Caisley, I don't have that exhibit in front
16 of me at the moment, so would you just read the
17 corrected sentence so I kind of get a context of what
18 it is that you're changing.

19 MR. CAISLEY: Absolutely, Mr. Chairman. It's
20 again line or page 20 of rebuttal testimony. I will
21 actually start on line 21 and read through the end of
22 the sentence. So as the Commission is aware, we have
23 not yet received authority to utilize AMI meters to
24 disconnect customers.

25 COMMISSIONER SILVEY: Okay. Thank you, Mr.

1 Caisley. Thank you, Judge.

2 COMMISSIONER HOLSMAN: This is Commissioner
3 Holsman. I have a question.

4 JUDGE DIPPELL: Go ahead, Commissioner.

5 COMMISSIONER HOLSMAN: Thank you.

6 Mr. Caisley, OPC mentioned that in 2014, you
7 had the same opportunities you do now with installing
8 these AMI meters. Can you elaborate a little bit on
9 what was the decision making at that time to forego
10 at that moment?

11 MR. CAISLEY: Certainly, Commissioner. So I
12 think a couple of things. First of all, unlike our
13 utility peers at that time, Evergy -- which was then
14 KCP&L -- already deployed meters with
15 telecommunication technology, meaning they could be
16 remotely read. It was AMR, which is one way.
17 There's not two-way communication like in the modern
18 AMI, but we had meters that did not have -- you did
19 not have to send a truck out to actually read them,
20 and we didn't estimate bills. That is different
21 relative to the other utilities, electric utilities
22 in the state at the time. And at the end of 2013,
23 2014 time period, that -- a couple things, one, that
24 technology was not going to be supported anymore, and
25 the contract for those cell meters were expiring. So

1 we had to make a decision as to what kind of meter to
2 deploy, and at that time, the AMI-SD meter was
3 available, that is factually correct, but it was
4 about \$165 a meter to install, whereas AMI technology
5 without that was around \$75, \$76. So it's more than
6 double the differential.

7 So we made the decision at that point because
8 of the fact that a lot of the value you get from
9 deploying an AMI-SD meter is the value of not having
10 to roll a truck to disconnect or to reconnect to
11 start or to stop service at that time with the
12 technology, the CIS, the meter data management and
13 the other systems we had in place, there wasn't a
14 differential for us. In other words, the business
15 case, we weren't going to -- because of Rule 13 or
16 Chapter 13 rules, we weren't going to be able to
17 knock-and-collect, and our systems at the time
18 wouldn't have handled a lot of the other technology
19 that was available. So it just didn't make business
20 sense to deploy \$165 meter at that time. Now as we
21 go forward and several years later, a lot of that
22 value was unlocked by our new systems that we
23 installed beginning in the 2017 time period, so it's
24 not just the knock-and-collect remote connect and
25 disconnect, but there's a bevy of other things that

1 the system can handle, and all of those -- we did a
2 business case, and all of those, actually two
3 analyses show that it was either neutral or
4 beneficial to customers.

5 So at the initial time period, it didn't make
6 sense, largely because we already had the biggest
7 part of the value, we weren't reading meters in
8 person at the time unlike other utilities, but now
9 there's a bevy of other advantages that our system
10 can take advantage of that we go ahead and we can use
11 the SD meters. And again, it says service
12 disconnect, but they're on page 13 I believe it is of
13 my rebuttal testimony. There's an entire page, 26
14 different value streams that we have looked at that
15 we are either now currently using or can use in the
16 future, near future, to benefit customers.

17 COMMISSIONER HOLSMAN: And what is the cost of
18 the meter today? It was 165 back then. What's it
19 looking at now?

20 MR. CAISLEY: When we started deployment, it
21 was around \$125. That price has gone down a little
22 bit in recent years. For the purpose of this case
23 and what's in testimony, it's \$125.

24 COMMISSIONER HOLSMAN: Okay. My last question
25 is: OPC had mentioned that Ameren and Liberty have

1 already gone this route and that Missouri wasn't any
2 worse off for it. Why would KCP&L if this were
3 denied be any different than those other two
4 companies in the state?

5 MR. CAISLEY: I might not understand your
6 question, Commissioner. Essentially we would not be
7 --

8 COMMISSIONER HOLSMAN: So if KCP&L says that
9 this were disallowed, it would somehow reflect on the
10 state of Missouri that it's hostile to this
11 technology, but if Ameren and Liberty have already
12 been adopted and approved, according to KCP&L, I'm
13 basing it off of their previous testimony, how is
14 that different from KCP&L -- I'm sorry, Evergy?

15 MR. CAISLEY: That's all right. I still do
16 that sometimes, too, Commissioner. Look, I think at
17 the end of the day, clearly Missouri has evidenced
18 its willingness to support AMI technology. I think
19 in this case what happened is we would stop deploying
20 the AMI-SD meters with all the benefits that come
21 along with them. We'd have two systems, we'd have
22 customers treated two different ways and ultimately
23 from a number of different angles including programs
24 and rates that are available to them. We just have
25 two differently positioned entities, and I think

1 that's confusing to customers, and it's something
2 that we would like to avoid.

3 COMMISSIONER HOLSMAN: Okay. And in the
4 further testimony, you mentioned electric vehicle
5 charging. How would the AMI benefit electric vehicle
6 charging as far as the customers' concern and the
7 company's concern when it comes to load and those
8 types of issues?

9 MR. CAISLEY: That's a great question. One of
10 the benefits of the new focus meters that we have,
11 the focus ASXD meters, is that it's a lot better, and
12 coupled with our CIS system and our meter data
13 management systems now can disaggregate load behind
14 the meter significant load. And so whether it's HVAC
15 load, whether it's electric vehicle load, it can
16 disaggregate that load at the meter and allow us to
17 give different pricing options because of that
18 disaggregation.

19 The other thing that it can do is this is a
20 mesh meter, meaning the communications, it can talk
21 to other devices that are on the system. Whether it
22 be a transformer, whether it be capacitor banks, it
23 can talk to other things that exist on the system,
24 and as a result, it can see things like voltage swell
25 or swags which could be caused -- sags -- which could

1 be caused by increased penetration of electric
2 vehicle charging. It's a variety of other things
3 that this meter can do from a technology standpoint
4 that the ones that are currently deployed cannot.

5 COMMISSIONER HOLSMAN: Are they set up to
6 prepare for when the vehicle starts providing storage
7 capacity for the home and flowing backwards or a
8 distributor generation customer who's already net
9 metering, how do they interact with the prospect of
10 those features?

11 MR. CAISLEY: So from a capability of reading
12 what is going on in the environment, this meter is
13 considerably advanced over the FOCUS AL meters that
14 are there now. So all of those kinds of things from
15 a data analytics and a communications to other
16 devices on our system are more advanced and would be
17 better served by this meter.

18 COMMISSIONER HOLSMAN: And that doesn't have
19 any different interplay with the net metered
20 customer?

21 MR. CAISLEY: For a net metered customer, it's
22 possible it could. I think you'd probably have to
23 get into some of the regulatory rules there and there
24 might have to be some waivers that we'd have to look
25 into for that. From a technology capability, it

1 certainly could. From a rules perspective, I think
2 we'd have to look that up. Right now, you'd be
3 required to have another meter.

4 COMMISSIONER HOLSMAN: Okay. Thank you, Mr.
5 Caisley. Informative as always. Thank you, judge.

6 MR. CAISLEY: Thank you, Commissioner.

7 JUDGE DIPPELL: Thank you. Are there any other
8 Commissioner questions?

9 COMMISSIONER KOLKMEYER: Thank you, Judge.
10 This is Commissioner Kolkmeier. I have no questions
11 at this time.

12 JUDGE DIPPELL: Thank you, Commissioner.

13 COMMISSIONER SILVEY: Judge, this is
14 Commissioner Silvey. I have a follow-up based on
15 Commissioner Holsman's questions if that's all right.

16 JUDGE DIPPELL: Go ahead.

17 COMMISSIONER SILVEY: Thank you, Mr. Caisley.

18 He just asked about possible future grid
19 updates that would allow bidirectional flow and how
20 this meter played into it. I didn't quite get your
21 answer on that. Will these meters allow for a
22 bidirectional grid or would that be another meter at
23 some point in the future that would have to replace
24 this one we're talking about today?

25 MR. CAISLEY: So I think there's really three

1 responses to that. One, no, this does not measure
2 bidirectional flow is my understanding, subject to
3 check, but it does have advanced analytics such that
4 we can disaggregate things behind the meter. So this
5 would allow us potentially to come up with a way with
6 our metered data management system and our new
7 billing system to potentially solve for that. That's
8 not something we have the capability of doing now,
9 and I believe -- again, subject to check -- our
10 regulatory folks probably know better that the rules
11 in Missouri right now would require two meters to
12 measure the flow in and the flow out.

13 However, it is conceivable that this could
14 handle this just from a data analytics and load
15 disaggregation perspective. That's not something
16 we've tried yet, but the capabilities could exist, we
17 believe do exist in conjunction with our new system
18 that we could disaggregate that load. Again, that's
19 not something that we've put into practice today and
20 we'd need to do some more work before we know that
21 for sure. For right now, you would have to have a
22 second meter installed on the home.

23 COMMISSIONER SILVEY: Okay. Thank you, Mr.
24 Caisley. Thank you, Judge.

25 JUDGE DIPPELL: Thank you. Any further

1 Commissioner questions? I'm not hearing any. I do
2 not have any questions for you.

3 COMMISSIONER RUPP: Judge, this is Commissioner
4 Rupp. I have a question that just popped in here.

5 JUDGE DIPPELL: Sure. Go ahead, Commissioner.

6 COMMISSIONER RUPP: Again, for the court
7 reporter, this is Commissioner Scott Rupp, R-u-p-p.

8 Mr. Caisley, so in your previous response to
9 either Commissioner Holsman or Commissioner Silvey, I
10 couldn't remember, why would you have to stop
11 deploying new meters in the future if this was
12 denied?

13 MR. CAISLEY: Well, I guess strictly speaking,
14 we wouldn't have to, but if the Commission were to
15 deny the recovery of the investment, it would be an
16 economic choice that we'd make. We wouldn't continue
17 to deploy things that were -- that we wouldn't
18 recover.

19 COMMISSIONER RUPP: Okay. And what's your time
20 table for finishing deployment?

21 MR. CAISLEY: I think we are currently
22 scheduled to be done in 2024, but my guess is given
23 the pace that we're going right now that it could be
24 that we'd finish up even as early as the end of next
25 year, but currently we're scheduled to go through

1 around the middle of 2024.

2 COMMISSIONER RUPP: Great. All right. Thank
3 you.

4 MR. CAISLEY: Thank you.

5 JUDGE DIPPELL: Any further Commissioner
6 questions? All right. We'll do additional cross
7 examination based on the questions from the bench.
8 Are there any questions from ChargePoint? Google?
9 Nucor? Velvet? St. Joseph? Dogwood? Sierra Club?
10 Renew?

11 MS. GREENWALD: No questions, Your Honor.

12 JUDGE DIPPELL: MIEC? MECG?

13 MR. OPITZ: No thank you, Your Honor.

14 JUDGE DIPPELL: Staff?

15 MR. VANDERGRIFF: Yes, Your Honor.

16 CROSS-EXAMINATION

17 BY MR. VANDERGRIFF:

18 Q. If the Commission disallowed for the old
19 meters, would you still continue to move forward with
20 the new ones?

21 A. If I understand your question correctly, if the
22 Commission were to disallow for the depreciating life of
23 the FOCUS AL or the existing meters but granted recovery
24 for the ones that we have put into service to date, yes,
25 we'd continue to deploy those meters.

1 MR. VANDERGRIFF: No further questions.

2 JUDGE DIPPELL: Thank you. Anything from
3 public counsel?

4 MR. CLIZER: Yes, I think, just briefly.

5 CROSS-EXAMINATION

6 BY MR. CLIZER:

7 Q. I want to walk through the math that was
8 discussed here. I want to make sure I have this
9 correct.

10 Your position is that to install an AMI meter,
11 not SD, but a regular AMI meter --by the way, this is
12 John Clizer for OPC, I apologize, I forgot that earlier.
13 Let me start my question over.

14 If you were to install a regular AMI-SD -- AMI
15 meter, not SD, in 2014, it would have been about \$75?

16 A. I gotta remember to sit by the phone. You're
17 saying the FOCUS AL non SD meter in 2014 --

18 Q. 2014.

19 A. It was right around \$75, \$76.

20 Q. And if you then replaced it with a -- I believe
21 they're the FOCUS AXR-SD meter now presently, it would
22 be about 125? I know you said it went down, but in
23 testimony, it's 125?

24 A. That's correct.

25 Q. So to install and then replace is a sum of 75

1 plus 125. I'm not great at math, but I think that's
2 210?

3 A. 200.

4 Q. Like I said, I'm not great at math. You are
5 correct. Sorry about that. Versus 165 if you had just
6 put the AMI-SD in place in 2014, correct?

7 A. That's correct.

8 Q. And if you had just put the AMI-SD in place in
9 2014, all of your meter deployment would be AMI-SD at
10 this point, right?

11 A. That's correct.

12 Q. So if you had installed the AMI-SD in 2014, it
13 would have saved customers money and you would have all
14 the meters in place now and you'd have all the
15 capabilities that you are now touting as a benefit for
16 the AMI-SD faster, correct?

17 A. It wouldn't have saved customers money, but we
18 have would have had those benefits. Those benefit
19 capabilities would have been available, but because we
20 didn't have a CIS system, a meter data management
21 system, a variety of the other things that we put in
22 2017 and 2018, no, we wouldn't have had all those
23 benefits, and actually we wouldn't have any of the
24 benefits of the SD meter because they were either
25 prohibited by the Commission and by Commission rule or

1 we didn't have the capability to use them. And as I
2 said before, unlike Ameren and Liberty who had analog
3 meter and were still going out and reading meters,
4 that's not something that we did, so we couldn't count
5 that in the business case.

6 Q. I think you might have misheard me.

7 You would have had all those benefits now?

8 A. Yes, we would have had all those benefits now.

9 Q. In fact, customers would have gotten those
10 benefits faster?

11 A. I don't know that I'd agree with that, no.

12 Q. Fair enough. The company at 2014 had no way of
13 looking to say, "What are we planning to do in the
14 future?" Were you making any forward plans in 2014?

15 A. Of course we do, like any utility or any
16 company.

17 Q. How long had you planned or considered the one
18 CIS investment?

19 A. You know, we were not -- we knew we had an end
20 of life for those platforms coming up, but we hadn't
21 made any decisions yet with respect to when we were
22 going to replace it and what the timeline was going to
23 be.

24 Q. You mentioned the Commission rules would have
25 prohibited you from performing no-knock disconnects, for

1 example.

2 A. That's correct.

3 Q. The Commission rules still prohibit you from
4 performing no-knock disconnects, correct?

5 A. That's correct.

6 Q. It's just a matter of having a waiver?

7 A. That's correct.

8 Q. You could have asked for a waiver in 2014 just
9 as you're asking for a waiver now, correct?

10 A. We could have, yes.

11 MR. CLIZER: I have no further questions.

12 Thank you.

13 JUDGE DIPPELL: Thank you. Before we go to
14 redirect, I don't think we actually admitted Mr.
15 Caisley's testimony.

16 MR. FISCHER: I'm sorry, Judge, I was
17 distracted. Go ahead, please.

18 JUDGE DIPPELL: I don't think we admitted --

19 MR. FISCHER: I think you're right, and I
20 apologize. I should have asked that all those
21 exhibits be admitted at that time.

22 JUDGE DIPPELL: Having offered the Exhibits 21,
23 22, 23, 107 and 108, are there any objections to
24 those exhibits? Seeing none, I will admit those
25 exhibits. And Mr. Fischer, when you're ready, go

1 ahead with your redirect.

2 REDIRECT EXAMINATION

3 BY MR. FISCHER:

4 Q. Mr. Caisley, I'd like to follow up on just some
5 of the questions that came from the commissioners
6 particularly.

7 Commissioner Holsman asked you about your 2014
8 decision and the reasons you didn't deploy the new
9 technology at that time, and I think you mentioned the
10 price of \$165 per meter; do you recall that discussion?

11 A. I do, yes.

12 Q. Were there other reasons that also factored
13 into your decision at that time besides the \$165?

14 A. Well, for sure cost was a big part of it, but
15 as I mentioned in the discussion with counsel for OPC,
16 you know, we had an old kind of uniquely constructed
17 billing system and meter analysis system, so most of the
18 features that we could take advantage of now simply were
19 not available to unlock given those systems back then.

20 Q. Did KCP&L have some AMR meters? And could you
21 explain what that is and why that factored in if it did?

22 A. Yeah, absolutely. That gets the other central
23 reason which was one of the biggest values or drivers of
24 other utilities making the switch to AMI-SD is the
25 ability to not have to go out and read -- they could

1 justify that higher price because they didn't have to go
2 out, they could stop rolling trucks to read meters.
3 That wasn't something that we could put into the value
4 calculation for us because we already had AMR meters,
5 which means we hadn't been doing that for years. And so
6 that is a huge part of the business case to replace and
7 spend \$165 a meter is stopping to roll trucks to go read
8 meters, and we already had stopped that, so we couldn't
9 put that into the calculation.

10 Q. Before we leave that discussion about the
11 dollars, I believe counsel tried to walk you through the
12 math, I think he said, and suggested that it was a more
13 expensive decision.

14 Do you have a response to that?

15 A. I do, and I understand if you just do simple
16 math and add two things together, you get to 200, and
17 200 is obviously more than 165, and that seems like a
18 no-brainer, but what that doesn't account for is the
19 time value of money and the investment. So if you do a
20 net present value calculation, which is something that
21 we do in a lot of other procedures in front of the
22 Commission including integrated resource planning and
23 others, you discount back to 2014 and you look at it,
24 what you get to is about \$152 per meter or for the AMI
25 without an AMI with the remote connect and disconnect

1 feature, which is less than the 165. Again, it's just a
2 net present value calculation that you have to do.

3 Q. And that's a positive from the consumer's
4 perspective; is that what you're saying?

5 A. It is. From our analysis, it's close enough
6 that it's a break-even to slightly positive, yes.

7 Q. Now, in 2014 when you were making that
8 decision, did you know what the prices for the new meter
9 technology would be five, six, seven years later?

10 A. No, we did not.

11 Q. I know you have a law degree.

12 Are you familiar with the prudent standard and
13 the use of hindsight?

14 A. Yes, I am.

15 Q. Would it be appropriate from your standpoint to
16 analyze this issue by looking at what prices actually
17 turn out to be?

18 A. No, not under the standard practice and rules
19 in Missouri.

20 Q. I believe you also mentioned in your answer to
21 Commissioner Holsman that you have quite a number of
22 values that were unlocked that you discussed in your
23 testimony. I'd like for you to just give the top three
24 that you think it unlocked.

25 A. Well, absolutely. First of all, there's a lot

1 of focus on the disconnect part of the SD meter. Almost
2 all of the testimony from other parties focuses on that.
3 We'd like to focus on the reconnect part of it.

4 So right now, it can take sometimes a day, and
5 if you do it afterhours on Friday or Saturday or Sunday,
6 it can take two or three days, nonbusiness days or a
7 holiday to start service or to restart service. So one
8 of the things we think is a very big benefit for this is
9 the ability to reconnect quickly. We also think that in
10 areas -- and this is becoming more and more prevalent --
11 where you have high turnover, it can be a variety of
12 different things, like the college rush or apartment
13 buildings, and we're seeing more and more apartment
14 buildings in our service territory whether it's urban or
15 suburban where there's higher amounts of turnover,
16 again, this eliminates troubles to turn on and turn off.
17 Probably I'd say the other things that make these meters
18 valuable in things that we're using today is the safety
19 aspects of it, whether it's temperature alerts, whether
20 it's the diagnostics around the ecosystem of
21 distribution that serves a customer. We can get into a
22 lot more about what's going on, not just whether service
23 is on or off, that's another benefit of this, it's
24 real-time outage notifications. And then as we look to
25 the future and we look at more complex rate structures,

1 we look at more complex ecosystems whether it's solar or
2 it's electric vehicle charging battery storage, those
3 are all things that are unlocked by the data analytics
4 and the nature of these new meters.

5 That's just a few. I mean, we could talk
6 probably all day about this. But in page 13 of my
7 rebuttal testimony is a list of 26 benefits, some that
8 we're using today, around 20 of them, and some that are
9 future state near follow items.

10 Q. Are there any unlocked values to this
11 technology for your employees?

12 A. Absolutely, and something that we will continue
13 after this case is resolved to request the Commission,
14 we would like to get to a point where we can waive
15 knock-and-collect and do re-remote disconnects. It
16 seems like society is getting more and more aggressive
17 and tempestuous these days. So it's a safety issue of
18 people knocking at the door and saying, "We're going to
19 disconnect your electricity service," every time you
20 walk through a yard, you face dangers like dogs -- you
21 wouldn't think it, but just this summer we had a huge
22 outbreak of poison ivy amongst some of our meter
23 readers, and then of course to the extent that folks
24 aren't in their cars and driving high numbers of vehicle
25 miles, it's preventable vehicle accidents, and all sorts

1 of things like that are reduced. So there's a real
2 safety benefit to our employees for this as well.

3 Q. During your discussion with Commissioner
4 Holsman, I believe he asked about Ameren and Liberty.

5 Does Ameren have a waiver to your knowledge of
6 the no-knock rules?

7 A. They do, yes.

8 Q. And do you recall whether the company actually
9 had filed -- I believe you changed that in your
10 testimony -- but did the company file a pleading asking
11 for a no-knock waiver at one point?

12 A. Yes, we have.

13 Q. Okay. Was there any other difference between
14 the situation with KCP&L back in 2014 and Ameren and
15 Liberty regarding your situation with cell net I believe
16 compared to their situation? Could you explain that?

17 A. Yeah. So again, the cell net meters were AMR,
18 so they're automatically read, which means it could send
19 to our distribution system a one-way signal that allowed
20 us to remotely read usage, which is different than
21 analog or non-cell equipped meters which were prevalent
22 for Ameren and Liberty during that time period.

23 Q. So did Ameren effectively go from analog and
24 leapfrog over to the new technology, but you had already
25 employed the AMR technology earlier?

1 A. That's correct.

2 Q. Okay.

3 MR. FISCHER: Judge, I think that's all I have.
4 Thank you very much.

5 JUDGE DIPPELL: Thank you. Mr. Caisley, the
6 AMR, can you just define that acronym for me?

7 MR. CAISLEY: Automated meter reading.

8 JUDGE DIPPELL: Thank you. Just wanted that to
9 be clear. I believe then that is all the questions
10 we have for you, and you may step down.

11 MR. CAISLEY: Thank you, Your Honor.

12 JUDGE DIPPELL: Does Evergy have another
13 witness?

14 MR. FISCHER: No, Judge, that's all the
15 witnesses on this issue. I believe staff is next
16 with Ms. Eubanks maybe.

17 JUDGE DIPPELL: Thank you. I had an extra on
18 my list. Staff may call its witness.

19 MR. VANDERGRIFF: Staff calls Claire Eubanks.

20 JUDGE DIPPELL: Please raise your right hand,
21 Ms. Eubanks.

22 Do you solemnly swear that the testimony you're
23 about to give will be the truth?

24 MS. EUBANKS: I do.

25 JUDGE DIPPELL: Thank you. If you could spell

1 your name for us.

2 MS. EUBANKS: Claire Eubanks, C-l-a-i-r-e,
3 E-u-b-a-n-k-s.

4 JUDGE DIPPELL: Go ahead.

5 Thereupon,

6 CLAIRE EUBANKS,

7 having been first duly sworn or affirmed, was examined
8 and testified as follows:

9 DIRECT EXAMINATION

10 BY MR. VANDERGRIFF:

11 Q. Please state your name for the record.

12 A. Claire Eubanks.

13 Q. Are you employed by the staff of the Commission
14 and in what capacity?

15 A. I am. I'm the manager of the engineering
16 analysis department.

17 Q. Have you filed in this proceeding a direct
18 marked as Exhibit 211 of public and confidential?

19 A. I have.

20 Q. A rebuttal marked as 238 public and
21 confidential?

22 A. Yes.

23 Q. And a surrebuttal marked as Exhibit 262 both
24 public and confidential?

25 A. Yes.

1 Q. Do you have any corrections to make on those
2 documents?

3 A. I do not.

4 Q. If I were to ask you those -- the questions in
5 those documents, would your answers be the same?

6 A. Yes.

7 Q. Are those same answers true and correct to the
8 best of your knowledge and belief?

9 A. Yes.

10 MR. VANDERGRIFF: Your Honor, staff moves
11 Exhibits 211, 238 and 262 into evidence.

12 JUDGE DIPPELL: Thank you. Are there any
13 objections to Exhibits 211, 238 and 262, all of which
14 I believe have both a confidential and a public
15 certification? Seeing no objection, I will admit
16 those exhibits.

17 MR. VANDERGRIFF: Staff tenders Claire Eubanks
18 for cross and redirect.

19 JUDGE DIPPELL: And is there any
20 cross-examination from public counsel?

21 MR. CLIZER: There is, Your Honor. I will
22 proceed. This is John Clizer for public counsel.

23 CROSS-EXAMINATION

24 BY MR. CLIZER:

25 Q. Good morning, Ms. Eubanks.

1 A. Good morning.

2 Q. You were here in the hearing room earlier when
3 Mr. Caisley was testifying, correct?

4 A. Yes.

5 Q. Do you recall Mr. Caisley suggesting that AMR
6 deployment was unique to Evergy?

7 A. I do.

8 Q. Ameren Missouri had also deployed AMR prior to
9 switching to AMI, correct?

10 A. That's correct.

11 Q. Ameren Missouri made the decision to switch
12 directly from AMR to AMI-SD, correct?

13 A. That's correct.

14 Q. Mr. Caisley discussed his net present value
15 calculation; do you recall that?

16 A. He did.

17 Q. In your surrebuttal, I believe you took issue
18 with that net present value calculation, correct?

19 A. Are you talking about the -- both financial
20 reviews or one or the other?

21 Q. I believe you took issue with both, correct?

22 A. That's correct.

23 Q. Let's start with the first one.

24 A. Let me refresh my memory on which ones.

25 Q. Take your time.

1 MR. CLIZER: And while she's doing that, I will
2 point out to Your Honor that there is quite a bit of
3 confidential information here. I am going to do my
4 best to ask questions in such a way as to avoid
5 directly addressing the confidential information to
6 prevent us from needing to go in-camera. But I guess
7 I will try and go slowly in case Evergy feels the
8 need to take us in-camera for anything.

9 JUDGE DIPPELL: Speak up quickly if you feel
10 that you're getting into an area that should be
11 in-camera.

12 BY MR. CLIZER:

13 Q. I believe on page 6 of your surrebuttal, in
14 describing the first financial review and the net
15 present value calculation, you determined that it does
16 not demonstrate that there are cost savings to AMI-SD
17 meter rollout; is that correct?

18 A. That's correct. So what the calculations show
19 from what Evergy presented is what they're saying is
20 essentially it's neutral, the planned deployment. The
21 drawback to what they have done is they're not
22 considering the investment that they have already made
23 in AMI meters into the net present value revenue
24 requirement additions.

25 Q. So the statements Mr. Caisley said earlier

1 about it being cheaper, you would disagree with that,
2 correct?

3 A. I would.

4 Q. And as for the second review, I believe you
5 also took issue for that as well?

6 A. Yes. So the second review, I mean, what I'm
7 saying is I think it's irrelevant. Coming up onto the
8 stand today, my understanding is that no party was
9 suggesting that the company should have installed AMI-SD
10 meters back in 2014, rather than the deployment that
11 they are doing now in situations where there's not a
12 reason to replace the meter, if it's broken, if a
13 customer requests net metering interconnection, if
14 there's access issues, none of those are included in
15 staff's disallowance. The only thing that's included in
16 staff's disallowance is when they've replaced an AMI
17 meter only to get the service disconnect capability and
18 those customers who are in arrears and those when the
19 company wasn't able to demonstrate why they changed the
20 meter.

21 Q. So actually that brings me to my next question.
22 I want to understand exactly what you're disallowing.
23 And I'm going to ask this question, you can tell me if I
24 got it right.

25 You are disallowing or rather removing from the

1 company's cost of service the remaining -- effectively
2 the remaining unrecovered value of the retired AMI
3 meter; am I right?

4 A. I estimated the cost of the new meters that
5 they have installed that are related to the deployment
6 of AMI-SD meters when they replace an AMI meter.

7 Q. That answers my question. Thank you. You had
8 just briefly mentioned it, so I guess I'll ask a
9 question.

10 It is your understanding that the company is
11 specifically targeting customers who are currently in
12 arrears when making the decision to replace meters,
13 correct?

14 A. In reviewing the data supplied by the company,
15 at least in a handful of cases in 2018, they had in
16 their notes that this customer is in arrears, we're
17 switching to an SD meter. A little bit more
18 aggressively in the 2020 time frame, I believe, they
19 started with the customers with the highest arrearages,
20 \$700, moving down to the lowest arrearages to \$150,
21 specifically switching out those meters for those
22 customers.

23 Q. All of the benefits to the existing AMI-SD
24 meters that the company is seeking to install existed in
25 2014 as far as the meter themselves?

1 A. My understanding is that AMI-SD meters were
2 part -- were considered by the company in 2014 when they
3 chose to deploy the FOCUS AL meters.

4 Q. All of the discussion regarding the cost of
5 meters, has that been in your understanding the cost of
6 the meter plant itself?

7 A. Can you rephrase the question?

8 Q. Regarding the discussion of the cost of meters
9 whether AMI or SD, the numbers that have been presented,
10 has it been your understanding that that refers to the
11 original cost of service of the plant itself?

12 A. The numbers that we've talked about today?

13 Q. Yes.

14 A. So the \$125 value is like an average number is
15 probably a fair way of putting it.

16 Q. Let me rephrase or try from a different angle
17 then.

18 Have any of these costs included any amount
19 capitalized for the installation of meters?

20 A. So in the net present value revenue requirement
21 financial review the company did, they included a meter
22 credit of \$35, which is the capitalization of labor,
23 move it from O&M to capital. So there was also an
24 adjustment to the capital cost of the meters to adjust
25 for that. Is that what you're asking?

1 Q. I just want to try and understand. Is that \$35
2 you're referring to, is it your understanding it's
3 included in the 75, 125, \$165 amounts?

4 A. It is not included in the \$125 amount.

5 Q. I will just leave it at that because I'm afraid
6 I'm going to make things even more confused.

7 JUDGE DIPPELL: Is that all, Mr. Clizer?

8 MR. CLIZER: One last question, I think.

9 BY MR. CLIZER:

10 Q. To your knowledge, has there been an additional
11 truck roll? Meaning, has the company been required to
12 go out to the premise of a residential customer in order
13 to replace the existing AMI meter with a new AMI-SD
14 meter?

15 A. They would have to go to the residents to
16 replace the meter.

17 MR. CLIZER: That was my last question. Thank
18 you.

19 JUDGE DIPPELL: Is there any cross-examination
20 from MECG?

21 CROSS-EXAMINATION

22 BY MR. OPITZ:

23 Q. Ms. Eubanks, these meter replacements, can you
24 tell me which customer class these meters are replacing,
25 which customer class are these meters -- are the

1 customers getting these meters in?

2 A. It would be probably all customers except for
3 large industrial customers.

4 MR. OPITZ: Thank you.

5 JUDGE DIPPELL: Anything from Renew Missouri?

6 MS. GREENWALD: No questions, Your Honor.

7 JUDGE DIPPELL: And Evergy?

8 MR. FISCHER: Just briefly, Judge. This is Jim
9 Fischer for the reporter.

10 CROSS-EXAMINATION

11 BY MR. FISCHER:

12 Q. Ms. Eubanks, as I understood your testimony to
13 public counsel, I believe -- I may not have gotten the
14 quote exactly right -- but did you suggest that no party
15 in this case is suggesting that the company should have
16 employed the new technology, the one that has the remote
17 disconnect and reconnect in 2014?

18 A. That was my understanding reading direct and
19 rebuttal testimony. That's on page 6 of my surrebuttal
20 testimony.

21 Q. Okay. That's great. So is it correct then
22 that staff believes the company made a prudent decision
23 in 2014 to deploy what it did?

24 A. Staff is not disputing that in this case. The
25 2014 deployment was a subject of the 2018 rate case as I

1 understand it, so we did not go back and kind of rethink
2 that decision.

3 Q. And of course that was based upon the
4 information they knew at the time; is that right?

5 A. What staff knew at the time and chose to look
6 at, yeah.

7 Q. Okay. And I believe you also said -- and maybe
8 I got this wrong -- but the company upgraded essentially
9 to the new technology, and the part I was interested in
10 was only to get the disconnect capability; is that what
11 you said?

12 A. That is what I said.

13 Q. Okay. Does the new technology also give you
14 the ability to reconnect?

15 A. It does, yes. To me, reconnect, disconnect, I
16 apologize, I was using that simultaneously.

17 Q. You understand there are savings with not
18 having to roll a truck to reconnect services, too,
19 right?

20 A. Yes.

21 Q. Okay. I know you reviewed the testimony of
22 Brad Lutz and your testimony in some detail.

23 Does staff agree that disconnect and reconnect
24 capabilities allow the company to utilize electronic
25 communications and deploy remote procedures that

1 eliminate the need for the company personnel to make
2 physical contacts with the customers?

3 A. Can you point me to the page and line that
4 you're referencing?

5 Q. Yeah. I was actually -- I know the page that
6 you began your discussion of Mr. Lutz's testimony was on
7 page 2 of your rebuttal. I was actually referring to a
8 statement he had made on page 38, line 10 of his
9 testimony, his direct testimony.

10 A. Page 38, line --

11 Q. Line 2. I think there he testified -- I think
12 I'll quote it -- "Disconnect and reconnect capabilities
13 allow the company to utilize electronic communications
14 and deploy remote procedures that eliminate the need for
15 company personnel to make physical contact."

16 A. And I think the Commission is well aware, and
17 we've talked about this today, we still have
18 knock-and-collect rules that would require the company
19 to make contact for disconnections.

20 Q. But you agree with that statement, don't you,
21 from Mr. Lutz?

22 A. With the understanding that there needs to be a
23 waiver from the disconnect rules, I don't think -- it's
24 not going to completely eliminate all company personnel
25 contacts with customers, I don't believe.

1 Q. Did staff support the waiver of the Don't Knock
2 waiver in the Ameren situation?

3 A. The Ameren situation was quite a bit different.

4 Q. Did staff --

5 A. I mean, ultimately, my recollection is there's
6 a stipulation and agreement that was well thought out
7 and had a lot of stakeholder interest.

8 Q. So you did support the waiver in the Ameren
9 case, right?

10 A. It was a stipulation and agreement in the
11 Ameren case.

12 Q. And that was for approval of the waiver?

13 A. Yeah. I mean, I don't have all the details,
14 but generally that's my understanding.

15 Q. Was there also an agreement with Liberty to
16 have a waiver for no-knock?

17 A. I don't recall. I apologize.

18 Q. Okay. That's no problem. On page 38 of Mr.
19 Lutz's testimony at lines 12 through 14, the testimony
20 you reviewed, he said that these changes result in more
21 costs, better collections, fewer on-premises incidents,
22 collection errors, and few disconnections.

23 Do you disagree with that?

24 A. I think what is important is the number of
25 instances that occur, and I would direct the Commission

1 to look at my surrebuttal testimony, Exhibit --

2 Q. But do you disagree with that statement?

3 A. I guess depending on what he means by lower
4 cost, I mean, lower MNM cost is a potential, but we
5 haven't seen actual demonstration that that has
6 occurred.

7 Q. But you're supporting that type of system for
8 Ameren and Liberty, correct?

9 A. Ameren and Liberty's deployment of AMI-SD
10 meters as we discussed and Mr. Caisley discussed this
11 morning is different than what Evergy has done.

12 Q. I understand. But with reference to lower
13 costs, don't you agree that for these utilities in
14 Missouri that this technology will produce lower costs
15 if they have remote disconnect and reconnect
16 capabilities?

17 A. Not without clarifying all the other factors
18 that go into it. I mean, customers are still paying for
19 meters that are not in use.

20 Q. Do you agree that disconnect and reconnect
21 capabilities would result in fewer on-premises incidents
22 with customers, with angry customers?

23 A. Staff has not included any of the instances
24 where the field staff indicated there was an access
25 issue. Those are not included in staff's disallowance.

1 Staff is not disputing the company replacing AMI meters
2 when there's access issues, dog incidents, and I
3 encourage you to look to my surrebuttal testimony
4 schedules which will say how many of those instances
5 have occurred.

6 Q. Mr. Lutz also testified on line 21 of that page
7 I think that when a minimum payment is received, a
8 reconnection order is sent immediately, and customer's
9 service is typically back on within 15 minutes.

10 Do you have any reason to disagree with that?

11 A. My understanding is it happens quite quickly.

12 Q. And is it also your understanding that as a
13 result of this technology, they can reconnect during
14 afterhours, during weekends and during holidays?

15 A. That's correct.

16 Q. And would you see that as a benefit to
17 customers?

18 A. I also see lower rates as a benefit to
19 customers.

20 Q. But you would agree that that convenience is a
21 benefit to customers?

22 A. That convenience is a benefit to customers.

23 Q. And on page 39 of Mr. Lutz's testimony at
24 lines 7 through 8, he says that reduced safety risks for
25 employees conducting manual reading activities or debt

1 collection resulting from hostile interactions at the
2 premise; do you see that?

3 A. I do.

4 Q. Do you have any reason to disagree with that?

5 A. That those instances occur? I've seen evidence
6 that the company has replaced meters when there was
7 access issues such as hostile interactions at the
8 premises.

9 Q. Yeah. It's a benefit that there's reduced
10 safety risk as a result of this technology, right? You
11 don't disagree with that, right?

12 A. I think -- we don't disagree with that, no.

13 Q. Okay. And I believe an answer to questions
14 perhaps from public counsel you were suggesting that
15 there was some evidence the company was I think you used
16 the word targeting arrears customers; is that right?

17 A. I don't recall if I used the word targeting or
18 not.

19 Q. Okay. Would you agree that in situations like
20 multi-tenant apartment buildings where there would
21 probably expected to be more turnover, more people
22 connecting and more people disconnecting, it would make
23 sense that there might be more of a benefit to have a
24 reconnect capability in that situation than there would
25 just in an old residence like my house that's been there

1 for 38 years?

2 A. I do not disagree that the company has targeted
3 apartment complexes and residences like that for part of
4 the service disconnect.

5 Q. Would you also agree that residences that
6 typically contain students that are in and out almost
7 every year that this technology would be very helpful in
8 reducing costs to be able to disconnect and reconnect
9 remotely?

10 A. I have not seen any evidence presented by the
11 company that those are the apartment complexes that were
12 --

13 Q. But intuitively, wouldn't it make sense that
14 that kind of a situation, it would be helpful to have
15 that kind of a capability?

16 A. Can you rephrase the question?

17 Q. Sure. Let's look down the street at Columbia
18 where they have, I don't know, 20 or 30,000 kids that
19 come in and out every year and they generally move
20 around most years to different apartments. Wouldn't it
21 make sense that a company that was serving that area
22 that had remote reconnection capability or disconnection
23 capability, it would make sense economically to have the
24 better technology in place for those kinds of
25 situations?

1 A. My understanding of the company's work papers
2 is that they did not take that into account
3 specifically.

4 Q. Okay. Well, maybe it's not in the work papers,
5 but doesn't it make sense that that would intuitively be
6 a good thing in that situation? If you don't know,
7 that's fine. It just seems to make sense from an
8 intuitive standpoint, doesn't it?

9 A. I don't understand what you mean by intuitive
10 standpoint, but --

11 MR. VANDERGRIFF: Objection. This question
12 calls for speculation and relevance.

13 MR. FISCHER: I'll withdraw it, Judge. That's
14 not a problem.

15 JUDGE DIPPELL: Thank you.

16 BY MR. FISCHER:

17 Q. Mr. Lutz also mentions on page 39 at line 11
18 that also the AMI meters have onboard temperature
19 sensing and alarm capability, this alerts the company to
20 issues on the premises which cause heating at the meter,
21 reducing the potential for meter socket fires.

22 Do you see that?

23 A. I do see that.

24 Q. Do you have any reason to disagree with that?

25 A. I don't have a reason to disagree with that.

1 Q. Do you think that would be a benefit to
2 customers?

3 A. Potentially.

4 Q. Okay.

5 MR. FISCHER: Judge, that's all the questions I
6 have. I appreciate your patience.

7 JUDGE DIPPELL: Thank you. Are there any
8 Commissioner questions for Ms. Eubanks?

9 COMMISSIONER SILVEY: Judge, this is
10 Commissioner Silvey. I do have one question.

11 JUDGE DIPPELL: Go ahead, Mr. Chairman.

12 COMMISSIONER SILVEY: Thank you. Ms. Eubanks,
13 it's been insinuated by OPC that in 2014, the company
14 should have deployed the AMI-SD meters, that that
15 would have been a better decision, and part of the
16 justification for that decision is, well, Ameren and
17 Liberty have moved forward with those deployments.

18 Do you know what years Ameren and Liberty moved
19 forward with those deployments?

20 MS. EUBANKS: To the best of my recollection,
21 Ameren moved forward with AMI-SD rollout in 2021, and
22 it will be continuing until 2025. My years might be
23 a little off. So at that time, they were replacing
24 AMR meters also, and to the best of my recollection,
25 those are about the 1990s vintage.

1 COMMISSIONER SILVEY: So Ameren's decision came
2 seven years after this disputed 2014 decision by
3 Evergy; is that fair?

4 MS. EUBANKS: So Evergy in 2014 replaced AMR
5 meters with AMI meters, and then seven years later,
6 they're replacing those fairly recently installed AMI
7 meters with AMI meters that have the ability to
8 disconnect and reconnect customers.

9 COMMISSIONER SILVEY: Correct.

10 MS. EUBANKS: So OPC I think in their opening
11 today discussed the decision in 2014. I'm sorry, is
12 that what you're asking about?

13 COMMISSIONER SILVEY: Yeah, that's the
14 question, because they're comparing -- at least my
15 interpretation of the argument is they're comparing
16 the decision in 2014 and saying look, they should
17 have not done this, Ameren and Liberty went straight
18 to AMI-SD. But my question is: Ameren and Liberty
19 made that decision with seven more years of
20 information; is that accurate?

21 MS. EUBANKS: They did have more information,
22 and seven years is about the right timeline, I think.

23 COMMISSIONER SILVEY: Okay. Thank you. No
24 further questions, Judge.

25 JUDGE DIPPELL: Thank you. And I forgot to

1 mention that Commissioner Coleman has also joined us
2 online. Are there any other Commissioner questions?
3 I have one or two questions, kind of long, so bear
4 with me.

5 I'm sorry if you covered this earlier, but I
6 just want to make sure I get everyone's questions.

7 On page 3 of your surrebuttal, lines 3
8 through 6 --

9 MS. EUBANKS: Yes.

10 JUDGE DIPPELL: So lines 3 through 6, you
11 updated staff's proposed disallowance to basically
12 6.3 million and 2.9 million for Every Metro and
13 Every West. Later in that paragraph at lines 9
14 through 11, you state that staff's disallowances are
15 for exchanges for unknown reasons and meters
16 exchanged solely to gain the remote connection,
17 disconnection feature.

18 Can you provide a breakdown of your proposed
19 6.3 disallowance for Metro between unknown reasons
20 and meter exchange solely to gain remote
21 reconnection, disconnection features, and the same
22 for West?

23 MS. EUBANKS: I can. That should be an
24 attachment to my surrebuttal testimony, though I'm
25 not seeing it. Staff can provide that, though. I

1 thought it was an attachment. I apologize.

2 JUDGE DIPPELL: So that would require just --

3 MS. EUBANKS: Me printing a PDF, yeah.

4 JUDGE DIPPELL: Is that something you think you
5 can get while we're still here today?

6 MS. EUBANKS: Yes, absolutely.

7 JUDGE DIPPELL: We'll hold off on that, and
8 maybe if there's some additional questions, bring you
9 back at the end here.

10 MS. EUBANKS: Okay.

11 JUDGE DIPPELL: Okay. Let's do that, then.

12 Are there any further cross-examination
13 questions based on questions from the bench, from
14 public counsel?

15 MR. CLIZER: Yes, Your Honor.

16 RE-CROSS-EXAMINATION

17 BY MR. CLIZER:

18 Q. Ms. Eubanks, you were asked a question by the
19 chairman regarding the fact that Ameren Missouri might
20 have had more information when it made the decision to
21 switch over.

22 A. Sure.

23 Q. Everygy is making an argument that there are
24 numerous benefits to these AMI meters, and I believe you
25 were asked a long series of questions regarding

1 potential benefits from counsel for Evergy.

2 You would agree with me that all of those
3 benefits existed in 2014, correct?

4 A. They did, yeah.

5 Q. So there would be no need for more information
6 --

7 A. I will say as far as what I understand.

8 Q. Thank you. Fair enough.

9 There would be no need for more information to
10 know what the benefits of an AMI-SD over an AMI meter
11 are?

12 A. I agree.

13 Q. And if Evergy had made the decision to put
14 these AMI-SD in 2014 when it knew all the benefits, they
15 would have saved money as compared to what they did in
16 this case of installing AMI and then replacing them
17 early?

18 A. I think the financial reviews produced by the
19 company does not show what they actually did. It's
20 assuming \$76 in 2014. In reality, it took many years to
21 deploy AMI meters. They barely finished their AMI
22 deployment before they started the AMI-SD deployment.
23 In fact, I think that's part of why you see in Brad
24 Lutz's direct testimony that he doesn't even mention
25 AMI-SD meters as a separate distinct rollout of meters.

1 Q. But you would agree that it would have been
2 less expensive for the company to have just installed
3 AMI-SD in 2014 and gotten all the benefits that are
4 supposed to come with them than to have installed AMI
5 and turned around and ripped them out in eight years?

6 A. Quite honestly, I have not done that
7 calculation.

8 Q. Fair enough.

9 MR. CLIZER: No further questions.

10 JUDGE DIPPELL: Thank you. Is there any
11 further cross-examination based on bench questions
12 from MECG? From Renew Missouri?

13 MS. GREENWALD: No questions, Your Honor.

14 JUDGE DIPPELL: Everyy?

15 MR. FISCHER: Just briefly.

16 RECROSS-EXAMINATION

17 BY MR. FISCHER:

18 Q. There was I think a reference, Ms. Eubanks, to
19 your amounts of the disallowances that are on page 3 at
20 line 6 in your surrebuttal.

21 A. Yes.

22 Q. My question is: I used different numbers in my
23 opening statement based upon what our understanding of
24 the reconciliation shows; would the second
25 reconciliation be the most current numbers?

1 A. The reconciliation includes the reserve
2 adjustment, so yes, that's correct. That would be six
3 percent essentially for GMO and 90 percent for KCP&L.
4 That's correct.

5 Q. So the 5.7 million and the 2.7 million would be
6 the current amount of the disallowance per your
7 understanding?

8 A. That sounds about right.

9 Q. Okay. Great.

10 MR. FISCHER: I think that's all I have. Thank
11 you.

12 JUDGE DIPPELL: Thank you. Is there redirect?

13 MR. VANDERGRIFF: Yes, Your Honor.

14 REDIRECT EXAMINATION

15 BY MR. VANDERGRIFF:

16 Q. Are there any differences between Ameren's
17 knock-and-collect waiver and Evergy's proposed?

18 A. Can you rephrase the question?

19 Q. You mentioned differences between Ameren's
20 knock-and-collect waiver.

21 What would those differences be?

22 A. So I think what I said is there's a difference
23 between Ameren Missouri's deployment strategy as it
24 relates to the knock-and-collect variance and Evergy's.
25 Staff has filed a recommendation in the

1 knock-and-collect variance case that was dismissed and
2 will reevaluate in the new case if it's necessary to do
3 so.

4 Q. What was different about Ameren's?

5 A. This is something that we discussed a little
6 bit with Chairman Silvey. Ameren's, they rolled out AMR
7 meters initially, and it was not until 2021 that they
8 chose to switch to the service disconnect meters. One
9 thing about their plan is they're doing it -- they're
10 deploying meters geographically, so they're moving
11 through an area, all the customers, all the neighbors,
12 they're getting new meters at the same time, and then
13 they move to another area. So it's a very thought-out
14 deployment strategy.

15 Q. Is Evergy doing the same thing, moving them all
16 out at the same time?

17 A. They're only going to -- as I understand it --
18 large apartment complexes, those customers with arrears.
19 To my knowledge, they're not doing a kind of geographic
20 installation.

21 Q. I want to move on to the cost of AMI-SDs.

22 Are cost of AMI-SDs currently known and
23 measurable?

24 A. Yes.

25 Q. Are the benefits of AMI-SDs currently known and

1 measurable?

2 A. I think what you're asking is do we see
3 evidence in this case that customers are receiving
4 reduction in O&M related to the AMI-SDs that they
5 deployed to date, and to my knowledge, we are not.
6 Specifically, the company -- and I don't want to get
7 into HC information -- but part of the financial review
8 included -- I guess --

9 MS. EUBANKS: Can I keep going? I don't want
10 to get into highly confidential information.

11 MR. FISCHER: Do we need to go in-camera? We
12 can do that if you want. Go ahead, please. If you
13 can stay out of it, that's fine with me.

14 JUDGE DIPPELL: Is there something in your
15 testimony that you can just point to without saying?

16 MS. EUBANKS: Yeah, that's a good idea, or we
17 can go in-camera, if you need to. Yeah. So on
18 page 7, lines 5 through 10, I discussed some of my
19 concerns with --

20 JUDGE DIPPELL: That's your surrebuttal
21 testimony?

22 MS. EUBANKS: That's my surrebuttal testimony,
23 yes. What was estimated in benefits, and how that
24 relates to what we see in this case. All of page 7.

25 BY MR. VANDERGRIFF:

1 Q. All right. So are the former AMIs used and
2 useful to customers today?

3 A. The ones that have been removed from service?

4 Q. Yes.

5 A. No.

6 Q. I want to move on to disaggregate.

7 What does disaggregate mean?

8 A. So when Mr. Caisley was talking about AMI
9 disaggregation, he's talking about data analytics on the
10 data received from AMI meters and being able to see what
11 customers are doing on their side of the meters.

12 Q. Can you explain the analytics at all?

13 A. I guess I don't know what --

14 Q. I will move on. But how does it work?

15 A. So, I mean, without getting into too many of
16 the details, they're using computers to figure out when
17 customers are doing certain things on their side of the
18 meter.

19 Q. Does the Commission have rules on meter
20 accuracy?

21 A. The Commission does have rules on meter
22 accuracy and testing of meters. That was something else
23 I discussed in my surrebuttal testimony.

24 Q. Have you seen any testimony of their
25 disaggregation is within their accuracy limit?

1 A. I think you're asking about the meter testing
2 rules and not disaggregation. Evergy or KCP&L had a
3 variance for a period of time for their meter sampling
4 program. That expired in 2018 -- I'm sorry, in 2016.
5 Is that what you're asking about?

6 Q. Yes.

7 MR. FISCHER: Judge, I think I'd like to
8 interpose an objection. If we're talking about meter
9 testing rules, I don't think that was brought up at
10 any point in cross or in any questions from the
11 bench.

12 MR. VANDERGRIFF: Then I'll let it go and move
13 on. One final question.

14 BY MR. VANDERGRIFF:

15 Q. Mr. Fischer asked you about the benefits of the
16 newer meters.

17 Did you factor all of the benefits when you
18 consider a disallowance?

19 A. I think what's really difficult is the company
20 didn't provide direct testimony supporting the service
21 disconnect, the AMI-SD meters in their direct testimony.
22 So staff's looking at it, of course, yes, they say that
23 there are benefits like access issues and that. Quite
24 honestly, that's why I limited my disallowance to not
25 include those.

1 So yes, we factored it in, but as far as the
2 benefits to the company they're saying, they didn't
3 quantify those. That's not in the net present value
4 revenue requirement calculation that Mr. Caisley
5 presents in his rebuttal or surrebuttal testimony.

6 Q. So given the bulk of the evidence you've seen
7 so far, do you still recommend the disallowance?

8 A. I do.

9 MR. VANDERGRIFF: No further questions.

10 JUDGE DIPPELL: Thank you, Ms. Eubanks. And
11 staff counsel, I asked for her to provide the
12 breakdown of the disallowance in her surrebuttal
13 testimony, and she said she could get that PDF. So
14 what I'm going to do is I'm going to ask them to
15 bring that in and send out a copy to everybody or
16 give everybody a copy as soon as you can, and then I
17 will ask if there are objections and if we need to
18 have some additional cross-examination based on that.

19 MR. CLIZER: Clizer from OPC. Can I query
20 really quick?

21 Is that in your work papers?

22 MS. EUBANKS: Yes, it is in my work papers. I
23 intended to attach it as a schedule. I think
24 something very similar is attached to my direct
25 testimony.

1 MR. CLIZER: The OPC does not need to be sent a
2 copy then. We already have her work papers.

3 JUDGE DIPPELL: Okay.

4 MR. FISCHER: Judge, I would appreciate seeing
5 what's she's got to give the Commission.

6 JUDGE DIPPELL: That would be fine. Just go
7 ahead and send that out. So for now, you can step
8 down, but if you'll remain available to be recalled
9 if necessary.

10 MS. EUBANKS: Absolutely. Thank you.

11 JUDGE DIPPELL: We've been going quite a while
12 here. It's almost 10:15. So I think this is a good
13 place for a break. If there's nothing before we go
14 off the record --

15 (No response.)

16 JUDGE DIPPELL: Not seeing anything, let's go
17 ahead and take a break until 10:30, and we can go off
18 the record.

19 (Intermission.)

20 JUDGE DIPPELL: Let's go ahead and go back on
21 the record.

22 So we have returned from our break just a few
23 minutes later than I anticipated, but we're going to
24 get started. Mr. Mark has already made his way to
25 the stand.

1 Mr. Mark, do you solemnly swear or affirm that
2 the testimony you're about to give at this hearing
3 will be the truth?

4 DR. MARK: I do.

5 JUDGE DIPPELL: Thank you. Public counsel, you
6 can go ahead with your witness.

7 MR. CLIZER: I tender the witness for cross.

8 JUDGE DIPPELL: And it was noted that Dr.
9 Mark's testimony was admitted earlier.

10 So is there cross-examination from staff?

11 MR. VANDERGRIFF: Yes, Your Honor.

12 CROSS-EXAMINATION

13 BY MR. VANDERGRIFF:

14 Q. How were you made aware of Evergy's decision to
15 replace AMIs with AMI-SDs?

16 A. I became aware of the situation in the EE
17 docket, the original Door Knock waiver request from the
18 company that was filed earlier this year. In technical
19 conferences, it became known to me that the company was
20 actually changing out their existing AMI meters with the
21 AMI service disconnect meters through discovery. I
22 guess that was handled by staff.

23 Q. You evaluated Evergy's cost benefit analysis on
24 their AMIs, correct?

25 A. I did.

1 Q. You disagree with Evergy's analysis?

2 A. I do.

3 Q. Under your analysis, there's not a benefit to
4 customers from Evergy's replacement of AMIs with
5 AMI-SDs, correct?

6 A. That's a great question. I would qualify it.
7 So I'm not saying that there's a hard stop, that there
8 are no benefits attributed from the service disconnect.
9 Obviously the ability to disconnect is the benefit. The
10 question what I think you're asking is whether or not
11 the benefits outweigh the cost. It's not just the cost
12 of that meter, but the cost of the previous meter that's
13 not fully depreciated as well as the cost for labor
14 that's associated with both of them.

15 The one -- there were two financial reviews
16 that were looked at, and Ms. Eubanks spoke to those
17 before, but the one point that I would mention is that
18 in the present value comparison, importantly, that
19 document limits the amount of years going forward. So
20 if you assume a 20-year lifespan for a meter, whether
21 it's AMI or AMI service disconnect, their present value
22 calculation has it effectively being neutral, that
23 there's very little difference between the two by moving
24 forward with this option. The problem there is that
25 their calculation ended it at the 20-year mark from

1 2014, so roughly 2034. The full comparison should go
2 out an additional eight years, so 2042, for example.
3 That's not factored into the calculation. And those
4 would be real costs that [indiscernible] would have to
5 bear. So I don't believe the benefits outweigh the
6 cost.

7 Q. I'm going to go ahead and move on to the
8 benefits of AMIs.

9 A. Sure.

10 Q. Evergy is fully utilizing all of the time of
11 use capabilities of its AMIs; isn't that correct?

12 A. So Evergy -- it's really easy to get lost in
13 the distinction when we're talking about the benefits of
14 AMI. This is hardware. There's a software component
15 that Mr. Caisley spoke about, and that's the CIS system,
16 and there's been extensive software components like the
17 Customer First program and the Uplight programs and so
18 forth. So lots of additional software components added
19 on to that hardware component. The hardware component
20 is a meter read, that's effectively what it is, it's
21 just reading the meter. There are abilities that can be
22 unlocked with that software component.

23 So are customers receiving the time of use
24 capabilities today? We've ran a very small pilot that's
25 been very successful for the company, and I know parties

1 have recommended to move forward more aggressively with
2 time of use rates in this case, but the vast majority of
3 customers have probably never even heard of the term
4 time of use rates. A vast majority of customers aren't
5 -- in our opinion have received the benefits that were
6 implied or at least promised in previous rate cases
7 before this Commission.

8 Q. All right. Evergy mentioned the benefits of
9 reconnect and the disconnect capabilities of the
10 AMI-SDs.

11 Does the prior AMIs have the reconnect
12 capability at all?

13 A. So this meter technology has been around at
14 least since 2007, so the additional feature to be able
15 to go ahead and reconnect and disconnect. And clearly
16 the nomenclature knows, it says it itself. So when we
17 say AMI-SD, it's AMI service disconnect. It's not AMI
18 RD, AMI reconnect, or SR, I guess service reconnect.

19 Today, my understanding is that the existing
20 AMI meters cannot be disconnected or reconnected, and I
21 say the existing, the non-SD meters. And due to the
22 Chapter 13 rules -- which we've already talked about --
23 there's a whole procedure in place to ensure really a
24 hard thought customer protection which is that Door
25 Knock provision is still in place.

1 Q. All right. No other states are having AMI
2 replacement issues, right?

3 A. As far as I know, I would be shocked, quite
4 honestly, to learn of any utility of the United States
5 that's already on their second generation of AMI meters.

6 MR. VANDERGRIFF: Your Honor, I want to go
7 in-camera for some qualified confidential questions.

8 JUDGE DIPPELL: Okay. And do we know that
9 there's no one else on the Web Ex that's not able --
10 okay.

11 MR. FISCHER: Judge, I guess I do have a
12 technical question.

13 How do you limit who's watching at this point
14 on Web Ex? Is there a provision for in-camera on Web
15 Ex?

16 JUDGE DIPPELL: Well, there is an ability to do
17 waiting rooms and such, but -- can you identify --
18 let's go off the record just briefly while we figure
19 out the in-camera.

20 (Off the record.)

21 JUDGE DIPPELL: We can go back on the record.
22 I apologize, I just wanted to make sure that we had
23 the in-camera procedure set up. So I will make an
24 announcement.

25 We've verified that there shouldn't be anyone

1 on the Web Ex that is not authorized to hear the
2 in-camera information. But I will ask our assistant,
3 Jackie Keeley, if she would monitor and make sure
4 that no one else joins the in-camera session on Web
5 Ex while we're in-camera. With that, we are
6 in-camera now. So you can go ahead with your
7 questions.

8 BY MR. VANDERGRIFF:

9 Q. Have you read Claire Eubanks' testimony?

10 A. I have.

11 Q. Were you aware of Evergy's -- of who Evergy is
12 contracted to with their AMI meters?

13 A. I am.

14 Q. How far does Evergy's contract with Landis &
15 Gyr go?

16 A. I know it's well into the future. I don't have
17 Ms. Eubanks' testimony in front of me, but I know it's
18 decades into the future.

19 Q. Are you aware of how many meters Evergy intends
20 to replace in that period of time?

21 A. Hundreds of thousands of meters.

22 MR. VANDERGRIFF: The next questions aren't
23 confidential.

24 JUDGE DIPPELL: Is that the extent of your
25 confidential?

1 MR. VANDERGRIFF: It is.

2 JUDGE DIPPELL: Then we can go back into the
3 public session.

4 We are back on the public session. Go ahead,
5 Mr. Vandergriff.

6 BY MR. VANDERGRIFF:

7 Q. You were here for Mr. Caisley's testimony,
8 correct?

9 A. I was.

10 Q. Is it unique for utilities to have different
11 meter types?

12 A. It's not unheard of.

13 Q. Evergy uses the same contractor for all of its
14 meters, correct?

15 A. That's correct.

16 MR. VANDERGRIFF: Your Honor, no further
17 questions from staff.

18 JUDGE DIPPELL: Okay. Thank you. Mr. Mark,
19 I'm going to ask if you could pull that mic just a
20 little towards -- there you go. And make sure you're
21 speaking directly into that. I think there may be a
22 little trouble hearing that.

23 DR. MARK: Sure. I'm always conscious of being
24 too close.

25 JUDGE DIPPELL: Don't worry about being too

1 close. We'll hold our ears.

2 Okay. Is there any cross-examination from
3 MECG?

4 MR. OPITZ: No thank you, judge.

5 JUDGE DIPPELL: Is there anything from Renew?

6 MS. GREENWALD: No questions, Your Honor.

7 JUDGE DIPPELL: Is there cross-examination from
8 Evergy?

9 MR. FISCHER: Just briefly, Judge.

10 CROSS-EXAMINATION

11 BY MR. FISCHER:

12 Q. Dr. Mark, you mentioned that you disagreed with
13 Evergy's analysis; is that right?

14 A. Yes.

15 MR. FISCHER: Judge, I'd like to have an
16 exhibit marked. It's a data request that includes
17 Evergy's analysis.

18 JUDGE DIPPELL: All right.

19 MR. FISCHER: I don't have but two copies. I'm
20 not sure --

21 JUDGE DIPPELL: I believe Evergy's next number
22 is 135. You have 137?

23 MR. FISCHER: Could we mark it 137 just in case
24 we've already got a 136?

25 JUDGE DIPPELL: Sure.

1 MR. FISCHER: Thank you.

2 MR. CLIZER: Is this being offered for just
3 West?

4 JUDGE DIPPELL: It hasn't been offered yet.
5 It's just being marked. I apologize. I know there
6 was some question about exhibit numbering for Metro
7 and West earlier in the hearing, but I -- does it
8 need a different number or is --

9 MR. STEINER: This is Roger Steiner talking.
10 We would want the exhibit in both cases, but I don't
11 think it needs to be marked twice.

12 JUDGE DIPPELL: Yeah, I agree that you can cite
13 to it by its number in either case. I don't think
14 that needs to be in there twice. Let's just leave it
15 as Exhibit 137. That may be skipping over a couple
16 of numbers. Mr. Fischer, you did have copies for
17 everyone or you --

18 MR. FISCHER: I did have a copy as it turns out
19 thanks to cocounsel.

20 JUDGE DIPPELL: Okay. Go ahead.

21 BY MR. FISCHER:

22 Q. Dr. Mark, I've handed you what's been marked
23 Exhibit 137.

24 Does this appear to be a data request in the
25 129 case that includes that analysis that you disagreed

1 with?

2 A. Yes, sir.

3 Q. Okay.

4 MR. FISCHER: Judge, I would move for the
5 admission of Exhibit 137.

6 JUDGE DIPPELL: Would there be any objection to
7 Exhibit 137 which appears to be a -- is this an
8 answer to the data request?

9 MR. FISCHER: Yes, Judge.

10 JUDGE DIPPELL: And it's labeled as Question
11 No. 2124 in Case No. ER-2022-0129.

12 Is there any objection to that coming in the
13 record?

14 MR. CLIZER: Give me just one second, Judge.
15 That's fine. What was the number again? I
16 apologize.

17 JUDGE DIPPELL: 137.

18 MR. FISCHER: Thank you.

19 JUDGE DIPPELL: So no objection?

20 MR. CLIZER: No objection.

21 JUDGE DIPPELL: Then I will admit Exhibit 137.

22 MR. FISCHER: That's all the questions I have.
23 Thank you, Judge.

24 JUDGE DIPPELL: Are there commissioner
25 questions for Dr. Mark? I'm not hearing any. Let me

1 double-check. I do not have any questions.

2 Is there redirect?

3 MR. CLIZER: There is, Your Honor.

4 REDIRECT EXAMINATION

5 BY MR. CLIZER:

6 Q. Good morning, Dr. Mark.

7 A. Good morning.

8 Q. Regarding the Exhibit 137 that was just entered
9 into the record, you were asked by counsel for Evergy
10 that this was the financial report that you disagreed
11 with, correct?

12 A. Correct.

13 Q. Why do you disagree with it?

14 A. So, I mean, in any sort of analysis like this,
15 reasonable minds I guess can differ over some of the
16 assumptions that are placed into this. But I'll just
17 point out just one quick thing, and I had just said this
18 before with counsel for Missouri Public Service
19 Commission staff, if you go to the second to last page.
20 So the analysis ends in 2034, and if you look at the
21 column labeled -- it would be Column 7 under 2021,
22 you'll note that that's the first year. Let's
23 cross-reference this so we've got it. It's Column 7,
24 Row 27, where you've got a \$201 million increase, and
25 that would be the combination of both meters that are

1 going into place. So the years that preceded it are
2 AMI, the years that follow that are two AMIs, and that
3 extends out to 2034, which would account for a 20-year
4 lifespan in total between 2014 and 2034. A full
5 analysis of this would extend seven additional years to
6 account for the AMI-SD.

7 Q. And that would drastically change the results?

8 A. That would flip the cost benefit, and all of a
9 sudden, it wouldn't be neutral. Now you have more of a
10 cost to customers. So you can torture data in a lot of
11 different ways to get the result that you want, and in
12 this case it's just expanding and contracting the
13 parameters to get in this case a neutral outcome. So
14 that would be my illustrative example.

15 Q. Is it a high level -- are there any other major
16 concerns that you would at least draw attention to?

17 A. In my testimony, I spoke to them. My concern's
18 over the actual cost associated with installing the
19 meters themselves. The assumptions around them, we
20 didn't -- Ms. Eubanks spoke about this before, but the
21 company generally spoke in normative statements
22 throughout their testimony that there's a lot of
23 benefits, reduced cost -- what's missing from all the
24 testimony is actual hard facts and data to support those
25 benefits. A lot of it is speculative at this point.

1 It's not to suggest that there couldn't be
2 benefits from this, we just don't know. There was
3 nothing to compare it off of other than what we were
4 able to look at here. The reduced O&M that they've got
5 in this spreadsheet is effectively meter readers that
6 have been redeployed to other positions is my
7 understanding. So the assumptions around a lot of those
8 inputs given the time would probably be challenged a lot
9 more, but we got this relatively late amongst the other
10 147 issues that we were testifying to.

11 Q. Moving on. You were asked a question briefly
12 by counsel for staff regarding the rollout of AMI meters
13 in other states. I believe you mentioned something
14 about you'd be surprised if any other state was on their
15 second generation of meters.

16 Do you recall that?

17 A. I do.

18 Q. With regard to other states, it's true there is
19 a number of states that aren't even on their first
20 rollout of AMI meters, correct?

21 A. That's correct.

22 Q. Why do you consider that to be an important
23 consideration here?

24 A. So utility regulatory states either fall into
25 one or the other category. They're either pre-approval

1 states where the utilities come in and say, "Here is our
2 plan, here is the cost benefit analysis, this is what
3 we'd like to do. Please, Commission, approve this," or
4 after the fact where we've enforced that prudence review
5 process like we do in Missouri.

6 In states where -- first of all, AMI has been
7 knocked down in both types of states -- if it's
8 situations where the benefits have not produced enough
9 to cover the cost. In Missouri, we look at the
10 investments after the fact. Management is likely making
11 managerial decisions. We're not paid to make those
12 decisions. But if we see that the utility's outside the
13 lines, that they're effectively beefing up rates based
14 in a situation where it would not call for it, we call
15 them out on it, and that's a situation that we have
16 before us here.

17 So it's absolutely appropriate that we raise
18 this issue in the context of this rate case and how we
19 set it up. But Massachusetts, Virginia, New Mexico,
20 Kentucky, these are all states that commissions denied
21 AMI deployment because the companies did not have a plan
22 in place for rolling out time of use rates, we're able
23 to go ahead and convincingly make a case that the
24 benefits outweigh the overall cost. Meters are not an
25 end-all-be-all item at the end of the day. The primary

1 function of a meter is just to capture your energy
2 usage. That's it. That's the most important thing.
3 Anything above and beyond that really needs to have a
4 basis for this, let alone replacing it for a second
5 meter after we just got it. So --

6 Q. You were also asked a question about the
7 benefits of reconnect and disconnect, and I'm pretty
8 sure you had mentioned something about they're called
9 SD, not SR.

10 Do you recall that?

11 A. I do.

12 Q. What is the difference between reconnects and
13 disconnects and why is that important here?

14 A. I look at it primarily as a function of
15 framing. If you look at how Landis & Gyr sells this
16 application to utilities, it says it's a service
17 disconnect, that's the value, being able to more quickly
18 disconnect a customer. I know the company's reframed it
19 as a benefit that this is a reconnect benefit. I look
20 at this as well, what if we raise this issue in front of
21 the public? What if we put it out in front of customers
22 and said, "Well, now the ability to be disconnected is
23 much easier"? By the way, those customers that have
24 arrearages or are renters are going to be the priority
25 customers to receive the service. I venture you're to

1 say you would get a backlash.

2 MR. FISCHER: Judge, I'm going to object. I'm
3 hearing a lot of speculation in this answer.

4 DR. MARK: This was all in my testimony.

5 JUDGE DIPPELL: We'll look at it in your
6 testimony, then, Dr. Mark.

7 DR. MARK: Thank you.

8 BY MR. CLIZER:

9 Q. You were asked a question from staff counsel
10 about benefits outweighing the cost.

11 Do you remember that line of questioning?

12 A. I do.

13 Q. Let's start with -- you were also specifically
14 asked a question whether or not the time of use rates or
15 time of use ability -- maybe I should say -- were being
16 utilized.

17 Do you recall that?

18 A. I do.

19 Q. Is AMI-SD or rather is the service disconnect
20 function of these AMI meters necessary for time of use
21 rates?

22 A. No. All of the benefits that we should be able
23 to get from time of use rates and rate designed can be
24 enabled through the existing AMI meters that are in
25 place today that have not been replaced.

1 Q. And the benefits that do come with those meters
2 we could be receiving if they had been installed
3 earlier?

4 A. That's correct.

5 Q. Moving broadly to the overall question of
6 whether or not the benefits outweigh the cost.

7 Is your position that there is -- that the
8 benefit of AMI-SD is never going to be outweighed by the
9 cost of AMI-SD?

10 A. I mean, it's a matter of timing.

11 Q. Can you explain that?

12 A. Sure. If I was replacing AMR with AMI-SD, we
13 would do the same analysis. We'd look at the cost
14 benefit analysis for any type of meter in any type of
15 situation. The key difference here is that there's been
16 a large scale investment in AMI meters that are just a
17 couple years old and that are being ripped out again.
18 Those costs negate the benefits many times over that
19 would be incurred from bringing on the AMI-SD meters.
20 Again, this is effectively just one feature, the ability
21 to disconnect and reconnect.

22 Q. So to summarize, it's not about the prudence of
23 installing AMI-SD, the problem here is the decision to
24 install AMI and immediately replace them with AMI-SD?

25 A. We never raised a prudence issue with

1 installing AMI meters in 2014 or the subsequent rate
2 cases that happened after that. It was only -- really
3 it was only out of a byproduct of another discussion
4 from another case that we even became aware that they
5 were taking out all of the AMI meters and replacing them
6 with generation two AMI meters because it wasn't in
7 their filed direct testimony. That's what makes it
8 imprudent.

9 Q. I believe you mentioned something about these
10 meters being available from 2007; is that accurate?

11 A. At least, yes.

12 Q. And to your knowledge, those are the same
13 meters that Evergy is now currently putting on?

14 A. Yes.

15 MR. CLIZER: I think I have no further
16 redirect. Thank you, Your Honor.

17 MR. FISCHER: Judge, this is Jim Fischer. I
18 think I should have marked that last exhibit with a C
19 because it is confidential. So it would be 137C.

20 JUDGE DIPPELL: All right. I have marked that
21 and it is confidential.

22 MR. CLIZER: Your Honor, does that mean that
23 the portions of the testimony on it --

24 MR. FISCHER: No. We didn't get into anything
25 that was of a concern.

1 MR. CLIZER: Okay.

2 JUDGE DIPPELL: And there was one other answer
3 that Dr. Mark gave that I was concerned was a
4 confidential item.

5 MR. FISCHER: I heard a name of a vendor. I
6 think that was under seal, but I don't think that is
7 a concern. He could be talking about it generically.

8 MR. CLIZER: I apologize, Your Honor, if that
9 inadvertently happened. I was trying to stay away
10 from redirecting on the confidential material
11 earlier.

12 JUDGE DIPPELL: That's fine. All right. Then
13 that concludes Dr. Mark's testimony, and you may be
14 excused.

15 DR. MARK: Thank you.

16 JUDGE DIPPELL: I think we have one more public
17 counsel witness.

18 Do you solemnly swear or affirm that the
19 testimony you're about to give at this hearing will
20 be the truth?

21 MR. ROBINETT: I do.

22 JUDGE DIPPELL: And would you please spell your
23 name.

24 MR. ROBINETT: Sure. My name is John Robinett,
25 R-o-b-i-n-e-t-t.

1 JUDGE DIPPELL: Go ahead.

2 MR. CLIZER: As Your Honor has previously
3 noted, Mr. Robinett's testimony has already been
4 offered and accepted, and I will therefore
5 immediately tender the witness for cross-examination.
6 Thank you.

7 JUDGE DIPPELL: Thank you, Mr. Clizer.

8 Is there cross-examination from staff?

9 MR. VANDERGRIFF: No, Your Honor.

10 JUDGE DIPPELL: From MECG?

11 MR. OPITZ: No thank you, Judge.

12 JUDGE DIPPELL: Renew Missouri?

13 MS. GREENWALD: No questions, Your Honor.
14 Thank you.

15 JUDGE DIPPELL: Everyy?

16 MR. FISCHER: No thank you, Judge.

17 JUDGE DIPPELL: Are there any commissioner
18 questions for Mr. Robinett?

19 COMMISSIONER SILVEY: No questions, Judge.

20 JUDGE DIPPELL: I have one question, but it
21 relates to what I was asking Ms. Eubanks to provide.
22 So let me see if I can still ask it -- if we can
23 still get this.

24 You're familiar with Ms. Eubanks' rebuttal
25 testimony, correct?

1 MR. ROBINETT: Honestly, not really, Judge.

2 JUDGE DIPPELL: Well, I was going to ask, but
3 if you're not that familiar with it -- I don't know.
4 I'll ask the question, and if you can't answer, just
5 say so.

6 In her surrebuttal testimony, she updated
7 staff's proposed disallowances for the early
8 replacement of AMI meters to 6.3 million generally
9 and 2.9 generally. I hope those aren't confidential
10 numbers, right? Okay. Do you have an opinion about
11 those proposed updated disallowance amounts?

12 MR. ROBINETT: No, I don't.

13 JUDGE DIPPELL: Thank you very much.

14 Is there any further redirect -- or I'm sorry,
15 recross, further cross-examination based on my
16 question from staff?

17 MR. VANDERGRIFF: No, Your Honor.

18 JUDGE DIPPELL: MECG?

19 MR. OPITZ: No thank you, Judge.

20 JUDGE DIPPELL: Renew?

21 MS. GREENWALD: No, Your Honor.

22 JUDGE DIPPELL: And Everygy?

23 MR. FISCHER: None.

24 JUDGE DIPPELL: All right then. Is there any
25 redirect based on that question?

1 MR. CLIZER: No, Your Honor. Thank you.

2 JUDGE DIPPELL: Thank you very much, Mr.
3 Robinett.

4 MR. ROBINETT: Thank you.

5 JUDGE DIPPELL: I believe you may be excused.

6 MR. OPITZ: Your Honor, if this is a good time,
7 I'd like to offer what I provided to counsel and to
8 Your Honor, MECG Exhibit 409, and that is the order
9 approving stipulations from Evergy West's most recent
10 rate case, ER-2018-0146.

11 JUDGE DIPPELL: And that was discussed
12 yesterday; is that correct?

13 MR. OPITZ: Yes, it was discussed, and I don't
14 believe any parties have any issue with that.

15 JUDGE DIPPELL: Let me ask first: Have the
16 other parties seen that exhibit?

17 MR. OPITZ: I have sent it to everyone. I
18 don't know if they've looked at it.

19 MR. CLIZER: I haven't had the opportunity to
20 check my e-mail, but I have no objection to it
21 presuming it's the information available from
22 [indiscernible].

23 MR. FISCHER: Evergy has no objection either,
24 Judge.

25 JUDGE DIPPELL: Is there any other objection to

1 Exhibit 409? Seeing none, I will admit Exhibit 409
2 or take official notice of that exhibit.

3 MR. OPITZ: Thank you, Your Honor.

4 JUDGE DIPPELL: What's the status of the
5 additional information I asked from Ms. Eubanks? Do
6 we need to take a brief break to --

7 MR. VANDERGRIFF: Sorry, Judge, I didn't hear
8 your question.

9 JUDGE DIPPELL: I was trying to see from staff
10 if they were able to locate the additional
11 information I was requesting.

12 MR. VANDERGRIFF: It was made available. You
13 should have it.

14 JUDGE DIPPELL: That's true. I've received an
15 e-mail. I just wanted to make sure everybody else
16 had received that.

17 MR. FISCHER: Your Honor, we're looking at it
18 now. Could we possibly go off the record so we could
19 review it? We just got it.

20 JUDGE DIPPELL: Yeah. Let's take like a
21 ten-minute break. Is that sufficient, you think?

22 MR. FISCHER: Yes.

23 JUDGE DIPPELL: Let's take a quick ten-minute
24 break, let the parties look at that exhibit, and then
25 we'll maybe bring Ms. Eubanks back up here.

1 So I've got 11:09, let's make it 11 minutes and
2 go for -- come back at 11:20. Let's go ahead and go
3 off the record.

4 (Interruption.)

5 JUDGE DIPPELL: So counsel have all had a
6 chance to look at that exhibit. It would be marked
7 as -- we're going to give it a staff number even
8 though the Commission asked for it -- as Exhibit
9 No. 284, and that's a breakdown of the staff
10 disallowance between unknown reasons and meter
11 exchange solely to gain remote reconnect, disconnect.
12 Let's see if the document has a title. It does not.
13 But it's a spreadsheet or table of that information.
14 Am I describing that correctly?

15 MR. CLIZER: Might I offer work papers of
16 Claire Eubanks as a title?

17 JUDGE DIPPELL: That sounds very good, concise.
18 Thank you.

19 MR. STEINER: Your Honor, this is Roger
20 Steiner. I thought there was an exhibit called work
21 papers that was 284. Did you give this one a number
22 yet?

23 JUDGE DIPPELL: I have not. I was going to
24 give it 284, but is there another 284? I didn't have
25 that on my --

1 MR. STEINER: I have a scribble here, but I'll
2 defer to staff. And I had one other comment.

3 JUDGE DIPPELL: Let's mark that as 285, and
4 that is Eubanks' work papers. Yes, sir.

5 MR. STEINER: The e-mail that I got said the
6 schedule was confidential, so could it be marked
7 285C?

8 JUDGE DIPPELL: Yes, it can. 285C. I'm
9 assuming it's the numbers in that that are
10 confidential? I'm looking at heads nodding. Okay.
11 So we have marked that.

12 I'm going to just ask if there are going to be
13 any objections to that coming into the record.

14 MR. STEINER: The commissioners requested no
15 objections, Your Honor.

16 JUDGE DIPPELL: Seeing no objections, then 285C
17 is admitted.

18 And would there be a need for further
19 cross-examination based on that exhibit?

20 MR. STEINER: No need from the company.

21 MR. CLIZER: No need from OPC.

22 JUDGE DIPPELL: All right. I'm not seeing any
23 additional cross-examination for Ms. Eubanks then.
24 So Ms. Eubanks, you may be excused.

25 MR. VANDERGRIFF: Your Honor, staff would like

1 an opportunity for redirect.

2 MR. STEINER: Your Honor, there's no questions.
3 I don't understand.

4 JUDGE DIPPELL: Let me -- first, I forgot to
5 ask if the commissioners have any questions about
6 this newly presented exhibit. And I'm not hearing
7 any, and I didn't have anything specific to ask. I'm
8 going to indulge staff in case there is some
9 information that I have missed since I'm kind of
10 playing it by ear today.

11 So Ms. Eubanks, would you like to come back to
12 the witness stand, please? I'll give the other
13 parties a chance to catch up if something is needed.

14 Ms. Eubanks, you were previously sworn. Go
15 ahead, Mr. Vandergriff. Did you have additional
16 questions?

17 MR. VANDERGRIFF: Yes, Your Honor.

18 REDIRECT EXAMINATION

19 BY MR. VANDERGRIFF

20 Q. In your work papers, you categorized the meter
21 model as GMO.

22 What does that mean?

23 A. So GMO is referring to Evergy Missouri West
24 meter replacements.

25 Q. You also have CK.

1 What does that mean?

2 A. That's referring to Every Missouri Metro meter
3 replacements.

4 Q. One of your columns is called FOCUS AL.
5 What does that mean?

6 A. So those are the AMI meters that we've been
7 discussing today that do not have service disconnect
8 capability.

9 Q. You also have FOCUS AS.
10 What does that mean?

11 A. So there are a lot of different model types of
12 meters on this. The other one that we've spoken a lot
13 about is the FOCUS AXRSD, which is the service
14 disconnect meters. There's slight differences in each
15 of these meter types. We didn't get into a lot of
16 detail for that, but these are all of the meters that
17 were exchanged in the time period that I looked at.

18 Q. Is RSR considered a meter version as well?

19 A. Yeah, every column is a meter type. The
20 unknown column is not -- in my testimony, when I
21 referred to unknown, that's the reason for the exchange.
22 This column is actually representing older meters that
23 they don't have records of anymore of what types of
24 meters they were provided in the data at least. So
25 that's not factored into staff's disallowance. Just

1 wanted to make that clear, those were older meters.

2 Q. Now, on your work papers, on the bottom of the
3 page, there's two separate columns, one amounting to
4 2.9 million --

5 JUDGE DIPPELL: Let's stay away from numbers --
6 the totals -- I'm sorry --

7 MR. VANDERGRIFF: It's what I testified to
8 before or we testified to before.

9 JUDGE DIPPELL: I apologize. The totals are
10 fine. Go ahead. I'm sorry I interrupted. You want
11 to repeat your question?

12 BY MR. VANDERGRIFF:

13 Q. Those numbers are in reference to your
14 surrebuttal?

15 A. Those are my surrebuttal direct testimony
16 values, yes.

17 Q. Now, the six percent and nine percent we have,
18 is that referenced to the reconciliation?

19 A. That's correct. That's the reserve adjustment.

20 MR. VANDERGRIFF: No further questions, Your
21 Honor.

22 JUDGE DIPPELL: I appreciate your questions,
23 Mr. Vandergriff, and just I'm going to continue
24 because some of the acronyms and so forth, I'm not
25 sure what's in the record and what's not. So let's

1 just continue along the top column.

2 And can you just define each of those acronyms
3 for the various types of meters?

4 MS. EUBANKS: That's just the name of the
5 meter. We've been using a shorthand of AMI versus
6 AMI-SD. That's just -- the meter manufacturer might
7 name each meter something different, and they have
8 slightly different capabilities. I don't have a list
9 handy that we could run through. I apologize.

10 JUDGE DIPPELL: So each one is just a different
11 kind of meter?

12 MS. EUBANKS: Yes.

13 JUDGE DIPPELL: Okay. I'm just looking down
14 the column of the other terms to see if there's
15 anything there that might need further definition.
16 Okay. I think that's fine.

17 Are there any other questions based on those
18 questions? Because I'm really kind of considering
19 those questions from the bench as far as --

20 MR. CLIZER: I just want to follow up really
21 quick on that.

22 CROSS EXAMINATION

23 BY MR. CLIZER:

24 Q. So the ones that have a -- SD are the service
25 disconnects?

1 A. So we were looking at exchanged meters, so yes,
2 if there were any instances of replacing an SD meter
3 with another SD meter.

4 Q. I'm just looking at that top row.

5 A. Anything with an SD is a service disconnect.

6 Q. Thank you. And are the RXRs, are those meters
7 with or without the service disconnect?

8 A. Those are without.

9 MR. CLIZER: That was my only question. Thank
10 you.

11 JUDGE DIPPELL: Are there any other questions
12 for Ms. Eubanks? I know we're kind of taking things
13 a little out of order.

14 MR. FISCHER: The company doesn't have any and
15 appreciates staff's clarifications.

16 JUDGE DIPPELL: I'm assuming the commissioners
17 have no further questions for Ms. Eubanks. Not
18 hearing any, Ms. Eubanks, this time, you may be
19 excused. Appreciate your testimony.

20 MS. EUBANKS: Thank you.

21 JUDGE DIPPELL: I believe that is our last
22 scheduled witness for today. Tuesday, the hearing
23 will resume. For now, 8:30 is the start time.

24 Are there any other issues or questions before
25 we go off the record?

1 COMMISSIONER RUPP: Judge, this is Commissioner
2 Rupp. Just want to say great job and thanks for
3 filling in for Judge Hatcher today. We really
4 appreciate it.

5 JUDGE DIPPELL: Thank you, sir.

6 MR. VANDERGRIFF: Your Honor, before we move
7 on, I just want to clarify that staff had Exhibit 211
8 both public and confidential, 238 both public and
9 confidential, and Exhibit 262 both public and
10 confidential admitted into evidence.

11 JUDGE DIPPELL: Those were admitted.

12 MR. VANDERGRIFF: Thank you, Your Honor.

13 JUDGE DIPPELL: Anything further? Seeing
14 nothing, we can adjourn for the day. We can go off
15 the record.

16 (Hearing adjourned.)

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CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF BROWARD)

I, Shelby Rosenberg, Florida Professional Reporter,
certify that I was authorized to and did
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Dated this 26th of September, 2022.



Shelby Rosenberg, Florida Professional Reporter