

FILED²

DEC 07 2005

Missouri Public
Service Commission

EXECUTIVE SUMMARY
REBUTTAL TESTIMONY OF DAVID L. STOWE
DOCKET NO. EO-2002-384

In his rebuttal testimony, Aquila witness David L. Stowe assesses the COS studies of the Missouri Public Service Commission Staff ("Staff") and Office of Public the Counsel ("OPC"). Stowe explains errors he found in Staff's and OPC's COS work papers, and describes inconsistencies in the parties' logic and data. Stowe also gives a detailed explanation of the true cause of fixed production and transmission costs, and describes how those costs are properly distributed to the customer classes. Stowe concludes his rebuttal testimony with the recommendation that the Commission endorse Aquila's COS methods and approve the COS results for use in Aquila's rate design.

Allocation of Fixed Production and Transmission Costs

In this section, Aquila witness Stowe defines "fixed costs" and demonstrates that these costs increase and decrease independent of customer energy usage or demand; proving instead that fixed costs are entirely dependent on the size and capacity of the plant equipment. Stowe then explains how fixed costs may be reasonably and adequately distributed to the classes using an energy weighted demand allocator.

Also in this section, Stowe clarifies how Staff's calculation and application of its time-of-use ("TOU") allocator distributes all the fixed costs on energy.

Allocation of Variable Production Costs

In this section, the variable costs are defined and their causes explained. Stowe demonstrates, with tables and schedules, how variable costs rise and fall in concert with system energy usage.

Review of OPC's COS Study

In this section, Stowe explains a number of inconsistencies and errors found in the OPC's work papers, and explains why the OPC's COS study will have many of the same errors as Staff's. Stowe shows how the OPC's adaptation and use of Staff's TOU allocators have created "demand" allocators that are shifted to the extreme, looking more 'energy like' than a straight energy allocator.

Additional Concerns with COS Studies

In this section Stowe describes a variety of concerns with respect to the various parties' COS studies. However, Stowe explains that many of these concerns may have already been resolved as a result of the Settlement Conference between the parties.

Recommendations and Conclusion.

In this section, Stowe recommends that the Commission reject the other parties' COS studies because of the errors and inconsistencies found in them. Stowe recommends that the Commission adopt Aquila's COS study and use the resulting revenues as a basis for designing new rates in this case.

Exhibit No. 5
Case No(s). EO-2002-384
Date 11-07-05 Rptr 45

Exhibit No.:

Issues: Cost-of-Service,
Fixed Cost Allocation,
Variable Cost Allocation

Witness: David L. Stowe

Sponsoring Party: Aquila Networks – L&P
Aquila Networks – MPS

Case No.: EO-2002-384

Before the Public Service Commission
Of the State of Missouri

Rebuttal Testimony

Of

David L. Stowe

TABLE OF CONTENTS

Allocation of Fixed Production and Transmission Costs	2
Review of Staff's COS Study	3
Allocation of Variable Production Costs	17
Review of OPC's COS Study	18
Additional Concerns with COS Studies	23
Recommendations and Conclusion.....	24

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI
REBUTTAL TESTIMONY OF DAVID STOWE
ON BEHALF OF AQUILA INC.
DOCKET NO. EO-2002-384**

1 Q. Please state your name and business address.

2 A. My name is David Stowe and my business address is 10700 East 350 Highway, Kansas
3 City, Missouri.

4 Q. Are you the same David Stowe that filed direct testimony in this case on behalf of
5 Aquila, Inc. ("Aquila")?

6 A. Yes, I am.

7 Q. What is the purpose of your rebuttal testimony?

8 A. My rebuttal testimony will focus on the cost-of-service ("COS") studies provided by
9 the other parties in this case through their direct testimonies. I will address the time-
10 of-use ("TOU") allocation methods used by the Missouri Public Commission Staff
11 ("Staff") and the Office of Public Counsel ("OPC") to distribute fixed production and
12 transmission costs. I will explain how this allocator is based on a faulty assumption
13 regarding the cause of fixed costs. I will also explain how this allocator is misapplied
14 and that, as a result of this misapplication, distributes fixed production and
15 transmission costs using an energy allocation. I will discuss errors that I have found in
16 Staff's and the OPC's COS studies. Finally, I will discuss how the misapplication of
17 the TOU allocator, and the errors in the studies, have affected the final results of the
18 COS studies.

1 My rebuttal will focus on the Aquila – MPS service territory since the structure of the
2 COS study for Aquila – L&P is identical while the data may be different.

3 Q. What recommendations do you make in your rebuttal testimony?

4 A. Based on the errors I found in Staff's and the OPC's COS studies, I recommend that
5 the Missouri Public Commission ("Commission") adopt Aquila's COS study and use
6 the resulting class revenues as the basis for designing new rates in this case.

7 **Allocation of Fixed Production and Transmission Costs**

8 Q. What are "fixed costs"?

9 A. Capital costs which are relatively constant, irrespective of the volume of discrete
10 energy or demand transactions, are considered "fixed costs". The premise is that
11 operating and capital costs of providing production and transmission services to a
12 customer are fixed in nature, are proportional to the maximum capacity of the
13 component parts, and do not vary with the quantity of energy used. For example, fixed
14 costs include those costs incurred to purchase equipment and property such as
15 turbines, coal mills, transmission towers, or land. These costs may be referred to as
16 "fixed" or "capacity" interchangeably, but throughout my rebuttal testimony I will
17 used the term "fixed" except when quoting from other witnesses' testimony.

18 Q. How are fixed costs normally classified?

19 A. Consistent with the National Association of Regulatory Utility Commissioners'
20 Electric Utility Cost Allocation Manual ("NARUC manual") fixed costs are normally
21 classified as capacity or demand.

22 Q. What type of allocator is generally used to distribute fixed production and transmission
23 costs?

1 A. Traditionally, fixed production and transmission costs were distributed using a peak
2 demand allocator, but this trend is changing. The NARUC manual states, "The
3 prevailing belief was that utilities built plants exclusively to serve their annual system
4 peaks as though only that single hour was important for planning... Over time it
5 became apparent to some that hours other than the peak hour were critical to the
6 system planner's perspective, and utilities moved toward multiple peak allocation
7 methods.¹"

8 Review of Staff's COS

9 Q. How did Staff classify fixed production and transmission costs in their COS study?

10 A. Staff witness Busch states, "The costs of generation facilities are directly related to the
11 utility's generation capacity, which is determined through the utility's system
12 planning, where many factors including both load factor and demand are considered,
13 and are thus classified as capacity related²." Later, witness Busch says, "Transmission
14 plant is generally considered to be an extension of production plant.³" Staff classified
15 the fixed production and transmission costs as capacity, or demand, related.

16 Q. Is this how the fixed production and transmission costs were classified in the other
17 parties' COS studies?

18 A. Yes.

19 Q. What allocator did Staff use to distribute fixed production and transmission costs?

¹ NARUC manual, pg. 39.

² Direct testimony of James A. Busch, pg 9 line 22 – pg 10 line 2

³ Id. Id. Id. pg. 11, line 22.

1 A. Staff used a time-of-use ("TOU") allocator which was equivalent to the Capacity
2 Utilization allocation method⁴. Staff's assumptions regarding fixed cost causation,
3 their calculations of the allocator, and their application of the allocator to all the fixed
4 costs throughout the year are inconsistent and force the TOU allocator to be an energy
5 allocator rather than a demand allocator.

6 Q. Please explain.

7 A. Staff's fixed cost allocator is an outgrowth of Staff's underlying assumptions about the
8 causes of those costs. Staff witness Busch describes a primary assumption in his direct
9 testimony when he states, "Because production *capacity costs are determined by loads*
10 *throughout the year*, each class's contribution to the sum of hourly class loads was
11 used to allocate hourly production capacity costs."⁵

12 According to his testimony, Staff witness Busch makes the assumption that fixed
13 production costs are caused by loads (i.e., KW) over a period of time. It is universally
14 recognized that the measurement of a load over a period of time is, by definition,
15 energy.

16 The TOU allocator, built upon the assumption that fixed costs are determined by
17 energy use, is calculated as follows...

18 "Hourly marginal production-capacity costs were derived from the hourly
19 *marginal energy costs*. In each hour the *marginal energy costs* are summed
20 to determine the *total energy cost*. The *total energy cost in each hour is*
21 *then allocated* to the classes based on their contribution to the total load in

⁴ "This is equivalent to the capacity utilization method when each increment of capacity is priced at its marginal cost." Direct testimony of James A. Busch pg. 11 line 12.

⁵ Id, pg. 10, line 12. (Emphasis added.)

1 that hour... This is equivalent to the capacity utilization method when each
2 increment of capacity is priced at its marginal cost.⁶

3 Q. Do you agree with Staff that fixed costs are determined by energy?

4 A. No.

5 Q. Why not?

6 A. Fixed costs, as I have already explained, are the costs of equipment and property.

7 These costs are capital costs that are incurred to purchase and/or install assets capable
8 of producing, transmitting, or supporting the electrical system. They are costs that do
9 not change throughout the year as the result of customers using more or less energy.

10 Q. If fixed costs are not caused by energy usage, what is the determining factor?

11 A. Fixed costs vary as additional assets (e.g., equipment or land) are purchased, installed,
12 retired, or transferred. The values of those costs are primarily determined by the size
13 and capacity of the asset. This statement is firmly grounded in fact, and can be easily
14 demonstrated.

15 Q. Please explain.

16 A. Consider the following example which focuses on FERC Account 314; the FERC
17 account used to track costs of steam turbo-generator equipment. According to the
18 FERC Code of Federal Regulations, title 18, this account includes the costs of air
19 cleaning and cooling apparatus, circulating pumps, generator hydrogen, cooling
20 towers, cranes, etc., all of which are necessary for the turbo-generator to achieve
21 maximum capacity. Aquila maintains a PowerPlantTM database which contains current
22 property records for every FERC property account that allows us to see how account

⁶ Id. pg 11, lines 7 - 13.

1 costs increase and decrease throughout the year. Table 1 below combines Account
2 314 cost data from the PowerPlant™ database with system energy and system peak
3 demand data from 2002.

Month	Beginning Balance	Additions	Retirements	Trans/Adjust	Energy (MWh)	Demand (KW)
Jan	\$61,550,829	\$268,496	\$0	\$0	462,943	834,061
Feb	\$61,819,325	\$0	\$0	\$0	394,158	777,456
Mar	\$61,819,325	\$0	(\$56,918)	\$0	389,893	742,294
Apr	\$61,762,406	\$13,868,219	(\$4,688,077)	\$0	341,990	606,853
May	\$70,942,548	\$0	(\$473,508)	\$0	376,136	873,715
Jun	\$70,469,040	\$0	\$0	(\$14,440)	486,866	1,062,771
Jul	\$70,454,600	\$107,303	\$0	\$0	560,208	1,150,301
Aug	\$70,561,902	\$0	\$0	\$0	535,540	1,138,318
Sep	\$70,561,902	\$62,480	\$0	\$0	423,343	1,041,735
Oct	\$70,624,382	\$32,513	\$0	\$0	369,551	730,489
Nov	\$70,656,895	\$0	\$0	\$0	374,113	692,128
Dec	\$70,656,895	\$546,081	(\$24,652)	\$0	439,078	812,063

Table 1. 2002 Account 314 changes compared to energy and demand.

4 Q. What does this table show?

5 A. The table shows that the fixed costs in Account 314 do not increase and decrease with
6 energy as they would if the costs were caused by energy use. Rather, the table shows
7 that these fixed costs are strictly independent of both system demand and energy.

8 Q. Please explain further.

9 A. In the 2002 calendar year, the largest change to the balance of Account 314 came in
10 April when \$13,868,219 in equipment was added and \$4,688,077 in equipment was
11 retired. The table shows that the peak demand and peak energy were lower in that
12 month than in any other month of the year. During the summer months, when demand
13 and energy values were at their highest levels, very little change was recorded in
14 Account 314. The fact that these fixed costs are not dependent on the loads
15 throughout the year is vividly apparent when the data from Table 1 is viewed in a chart

1 as in Rebuttal Schedule DLS-1. On this schedule, the monthly change to Account 314
2 is charted along with the monthly system energy in megawatt hours and the monthly
3 system peak demand in kilowatts.

4 The table and chart demonstrate that fixed costs are not determined or caused by
5 system energy or demand, but instead are determined by the cost of land and
6 equipment as it is purchased, installed, retired, or transferred. The cost of that
7 equipment, in turn, is directly related to its maximum power handling or power
8 producing capacity.

9 Q. Does the NARUC manual say that production plant costs are determined by energy?

10 A. Yes, it does. It should be clear from what I have already said, however, that I disagree
11 with the NARUC manual on this point.

12 The NARUC manual states, "For the generation function, cost causation attempts to
13 determine what influences a utility's production plant investment decisions. Cost
14 causation considers: (1) that utilities add capacity to meet critical system planning
15 reliability criteria such as loss of load probability (LOLP), loss of load hours (LOLH),
16 reserve margin, or expected un-served energy (EUE); and (2) that the utility's energy
17 load or load duration curve is an indicator of type of plant needed. The type of plant
18 installed determines the costs of the additional capacity."⁷

19 The preceding paragraph does not tell the entire story. What it does not say is that,
20 after the type of plant is chosen to meet the criteria stated, the ultimate question which
21 must be answered is, "How much power must the plant be capable of producing?"

⁷ NARUC Manual, pg 38.

1 The answer to *that* question determines the fixed costs amount. Of course when the
2 plant is constructed, an efficient operation and maintenance program can help the
3 utility achieve the reliability levels (LOLP, LOLH, and EUE) that the engineers had
4 planned. Also, many of the costs incurred to operate the plant reliably and efficiently
5 do vary with the energy used and are tracked in separate FERC Accounts. The
6 NARUC manual stops short of explaining these facts, and leaves the readers to draw
7 their own conclusions. However, it is incorrect to infer that fixed costs are caused by
8 energy usage simply because energy is a consideration during the planning stage.
9 Later, the NARUC manual states, "There is evidence that energy loads are a major
10 determinant of production plant costs." Yet, the evidence is never given, nor is it clear
11 what comprises the "production plant costs". According to my research of Aquila's
12 fixed production costs, the evidence shows that fixed production and transmission
13 costs rise and fall independent of system energy and peak demand.

14 Q. If fixed costs are not caused by either the energy or the peak demand of the system,
15 why are demand allocators used to distribute those costs to the classes?

16 A. The premise is that the costs should be allocated to, and recovered from, the classes
17 that the costs were incurred to serve. Since production and transmission equipment
18 are purchased for the benefit of every class of customer, and since the value of that
19 equipment is related to the capacity or demand of the equipment, analysts consider
20 capacity (i.e., demand) as the "link" connecting fixed costs to the classes. However,
21 this link between fixed costs and capacity is merely the starting point when attempting
22 to determine a proper fixed cost demand allocator. The questions still remain; should

1 the allocator use coincident or non-coincident demand? Should it include multiple
2 peaks or a single peak? Should the allocator use system, class, or customer demands?

3 Q. Does the NARUC manual discuss the allocation of fixed production and transmission
4 costs allocation?

5 A. Yes. The NARUC manual describes the history of fixed cost allocation this way. "In
6 the past, utility analysts thought that production plant costs were driven only by system
7 maximum peak demands. The prevailing belief was that utilities built plants
8 exclusively to serve their annual system peaks as though only that single hour was
9 important. Correspondingly, cost of service analysts used a single maximum peak
10 approach to allocate production costs. Over time it became apparent to some that
11 hours other than the peak hour were critical from the system planner's perspective, and
12 utilities moved toward multiple peak allocation methods.⁸"

13 The NARUC manual goes on to describe a variety of allocation methods including
14 multiple coincident peak, multiple non-coincident peak, and methods that combine
15 peak demand and energy weighted components.

16 Q. What are "energy-weighted" demand allocators?

17 A. Energy-weighted demand allocators are simply demand allocators that include an
18 average energy component. Demand allocators based on a single maximum peak
19 place excessive responsibility on certain customer classes and miss others. Using
20 multiple demand peaks eliminates this somewhat, but even multiple peak allocators
21 can miss certain classes entirely.

⁸ NARUC Manual. pg. 39.

1 Q. Can you give an example of a customer class that might be missed or under
2 represented by a single or multiple peak allocator

3 A. Yes. The lighting class is one that is under represented using a single or multiple peak
4 demand allocator. This is because the lighting class contributes very little, if anything,
5 to peak demand. Using an energy-weighted demand allocator, however, will assign
6 some level of demand to the lighting class or classes with demand characteristics
7 similar to it.

8 Q. Doesn't the use of energy-weighted demand allocators assume that the costs
9 distributed by those allocators are caused by energy?

10 A. Not at all. As I have already said, energy-weighted demand allocators are used to
11 fairly assign demand related costs to every class of customer, not because energy usage
12 is believed to cause those costs.

13 Today, most if not all COS analysts, including those at Aquila, have moved away from
14 single and multiple peak allocation methods and are using allocation methods which
15 combine multiple peak and energy components. Aquila has used some form energy-
16 weighted demand allocator for over a decade. In the current COS study, we have used
17 an Average and Excess allocator that combines average energy with the three highest
18 coincident demand peaks. Others analyst use time-differentiated allocation methods
19 to assist in developing time-differentiated rates such as critical peak pricing (CPP),
20 real time pricing (RTP), and time-of-use (TOU). While growing in popularity, time-
21 differentiated techniques are less common than the other methods due to the elaborate
22 supporting studies that are required.

23 Q. Can you give examples of energy-weighted demand allocators?

1 A. Methods such as "Average and Excess", "Equivalent Peaker", "Base and Peak", and
2 the time-differentiated methods all result in energy-weighted demand allocators.

3 Q. Is Staff's TOU allocator one of the time-differentiated allocators described in the
4 NARUC manual?

5 A. No. The NARUC manual describes a variety of methods for determining "time-
6 differentiated" COS studies. These methods are broadly described as production
7 stacking methods, system planning approaches, the base-intermediate-peak method,
8 the LOLP (loss of load probability) production costs method, and the probability of
9 dispatch method.

10 Staff's TOU allocator is similar to the production stacking method, insofar as it
11 assumes a certain percentage of fixed costs are allocated on energy and the remainder
12 on demand. In other words, there is a certain mix, or stack, of generating units which
13 meet the requirements of a base level of load, and the fixed costs of that base
14 generation mix is the energy portion of the capacity costs. The remainder of the fixed
15 costs are allocated on demand.

16 Conversely, Staff's TOU allocator is *unlike* the time-differentiated methods described
17 in the NARUC manual in a number of critical ways.

18 Q. How is Staff's TOU allocator different from the time-differentiated allocations
19 described in the NARUC manual?

20 A. First, Staff's TOU allocator is not supported by the requisite "base level of load" and
21 "generation mix" studies. These studies are essential in determining which portion of
22 the capacity costs should be allocated as energy and which portion as demand. Without

1 them, it is impossible to know which portion of capacity costs the TOU allocators
2 should distribute as energy and demand.

3 Second, Staff's TOU allocator is not part of a COS study that has identified time-
4 differentiated costs. Staff's COS study used cost data which came from the stipulated
5 agreement in Aquila's previous revenue requirements electric rate case⁹. This
6 agreement has been termed a "black box" agreement because, while the resulting
7 revenues are known, the specific cost details are not. Staff presented direct testimony
8 in that case which included schedules showing adjustments made to energy and
9 revenue values. These adjustments "updated" the test year for "known and
10 measurable" transactions as of September of 2003. Yet, the demand and energy data
11 upon which Staff's TOU allocator was calculated does not contain those adjustments.
12 The dataset Staff used to develop the TOU allocators had a *different* adjustment, one
13 for weather normalization, made to it. With such a starting point, it is impossible to
14 identify time-differentiated costs or to match them to hourly loads. That is to say,
15 there is no way to determine the costs of production and transmission during specific
16 time periods throughout the day, month, or year.

17 Finally, Staff's COS makes no attempt to determined time-differentiated rates.
18 Instead, Staff's COS uses the same basic data and logic as Aquila's which is designed
19 to determine, at best, seasonally differentiated rates for Aquila's customer classes.
20 Staff's use of the TOU allocator in this case, therefore, is something of a hybrid;
21 applying a method best suited for CPP or RTP rates to data that came out of a black

⁹ Case No. ER-2004-0034.

1 box settlement. The net result was an energy allocation applied to all fixed production
2 costs.

3 Q. Please explain what you mean.

4 A. In describing the time-differentiated methods, the NARUC manual says, "The basic
5 principle of such methods is to identify the configuration of generating plants that
6 would be used to serve some specified base level of load[, and] to classify the costs
7 associated with those units as energy related. The choice of the base level of load is
8 crucial because it determines the amount of production plant cost to classify as energy-
9 related."¹⁰

10 What this means is that a valid time-differentiated method will first identify a "base
11 level of load" and then determine the configuration of base, intermediate, and peaking
12 units that serve that base load. The costs associated with this "base generation mix"
13 are then classified as energy and the remainder as demand.

14 Q. What approach did Staff take?

15 A. The "base level of load", to which Staff applies its TOU allocator, is the sum of the
16 class non-coincident peaks. The corresponding "base generation mix" which Staff
17 assumes will meet the "base level of load", consists of every plant on the system.

18 Q. What does this mean?

19 A. In theory, Staff is setting aside every generating unit to be classified as energy, leaving
20 nothing to classify as demand. When Staff applies the TOU allocator to the total fixed

¹⁰ NARUC manual, pg. 60.

1 production costs over the entire year, Staff allocates all fixed production and
2 transmission costs as energy.

3 In its direct testimony, Staff admits that it *classifies* fixed production and transmission
4 costs as demand, and implies that its TOU allocator is a valid energy-weighted
5 demand allocator; fairly allocating a portion of fixed production and transmission cost
6 to the classes. Yet in practice, Staff calculates the TOU allocators on energy and
7 distributes all the fixed production costs to the classes using them. This is logically
8 inconsistent.

9 Q. In their direct testimony, does Staff explain benefits of using the TOU allocation
10 method?

11 A. Yes. In discussing the value of the TOU method, Staff witness Busch writes, "it has
12 the characteristic that every customer, large or small, residential or industrial, pays
13 exactly the same price as every other customer taking service in the same hour. In this
14 respect, TOU allocations mimic a truly competitive retail electricity market."

15 Q. Does the TOU allocation method have the characteristic that every customer pays
16 exactly the same price as every other customer in the same hour?

17 A. Not as it was applied in Staff's embedded COS study. The ultimate goal, in this
18 proceeding, is to develop rates for every customer class that will collect revenue to
19 cover the costs incurred for that class plus the approved return. In addition, Aquila is
20 ordered to use data, which came out of the previous electric revenue requirements
21 case, to meet that goal. While marginal cost techniques are popular and helpful when
22 applied properly, using them in this instance to model Aquila's costs is a mistake.
23 Applauding the idea that the TOU allocation method, when applied properly, mimics a

1 truly competitive retail electricity market, particularly in light of the fact that Aquila is
2 a regulated monopoly, is meaningless.

3 Q. How do Staff's TOU demand allocators compare to energy allocators?

4 A. Staff's final TOU production demand allocator, for residential customers, is just
5 4.16% above the energy allocator that was calculated as the ratio of class annual
6 energy to system annual energy. Similarly, the final TOU transmission demand
7 allocator, again for the residential class, was just 1.23% above the energy allocator. In
8 both cases, these were the largest deviations when compared to the energy allocator.
9 A comparison of the TOU and energy allocators is shown in Table 2 below.

TOU Allocators	Prod. Capacity	Prod. Energy	Trans. Capacity	ENERGY	DIFF Prod Capacity	DIFF Prod Energy	DIFF Trans. Capacity
RES GEN	36.40%	32.00%	31.41%	31.34%	5.07%	0.67%	0.07%
RES SH	13.22%	14.08%	15.29%	14.13%	-0.90%	-0.05%	1.16%
SGS	15.69%	15.31%	15.35%	15.26%	0.43%	0.06%	0.09%
LGS	14.46%	15.40%	15.34%	15.53%	-1.08%	-0.13%	-0.20%
MODINE	0.10%	0.12%	0.12%	0.12%	-0.02%	0.00%	0.00%
TES	0.13%	0.13%	0.13%	0.14%	0.00%	0.00%	-0.01%
LIGHTING	0.41%	0.74%	0.69%	0.80%	-0.39%	-0.06%	-0.11%
LPS	19.59%	22.21%	21.68%	22.69%	-3.10%	-0.48%	-1.01%
TOTAL	100.00%	100.00%	100.00%	100.00%	0.00%	0.00%	0.00%

Table 2: Comparison of Staff's TOU and Energy Allocators

10 Q. What is the impact on the COS study of allocating fixed production and transmission
11 costs using the TOU allocator?

12 A. The answer is explained in Table 3 on the following page. This table shows the results
13 of all the parties' COS studies which were developed using identical values for total
14 fixed costs, total expenses, and total revenue. Every party split distribution plant by
15 voltage level using the same primary and secondary percentages, and every party
16 shifted dollars between classes to achieve identical rates of return from each class.

1 However, only three of the four parties (the OPC being the exception) used the same
2 customer and demand percentages when classifying distribution fixed and variable
3 A. costs.

MPS	AQUILA			STAFF		SIEUA		OPC	
	(\$)	(%)		(\$)	(%)	(\$)	(%)	(\$)	(%)
RES-GEN	\$15,898,191	13.09%	8.22%	\$5,382,207	3.16%	\$15,216,349	8.95%	(\$1,788,394)	-1.04%
RES-SH	(\$1,911,037)	-3.93%							
SGS-S	(\$5,246,815)	-10.50%	-10.52%	(\$1,880,429)	-3.49%	(\$5,269,377)	-9.78%	(\$3,166,113)	-5.79%
SGS-P	(\$15,562)	-20.70%							
LGS-S	(\$6,570,348)	-15.46%	-14.91%	(\$3,463,580)	-7.84%	(\$6,174,218)	13.97%	(\$1,547,506)	-3.45%
LGS-P	(\$60,034)	-4.27%							
LGS-SF	\$41,663	15.16%							
LPS-S	(\$2,249,538)	-8.62%	-6.86%	\$1,418,776	2.78%	(\$3,812,332)	-7.46%	\$6,370,484	12.24%
LPS-P	(\$1,255,689)	-5.03%							
S&C	(\$71,141)	-2.43%							
MUNI-WPR	\$132,822	14.85%							
MODINE	\$23,008	8.98%		\$74,534	13.21%	\$39,578	15.45%	\$131,529	22.86%
THERM	\$21,090	6.85%							
LIGHTS	\$1,263,390	24.47%		(\$1,531,508)	-29.64%				

Table 3: COS study result comparison.

4 Q. What are the main differences in the parties' COS studies?

5 A. The fundamental difference in the COS studies is the production and transmission
6 allocator used by the parties. Aquila and SIEUA used Average & Excess demand
7 allocators; Aquila relied on the three highest coincident peaks (A&E-3CP) and SIEUA
8 used the three highest non-coincident peaks to calculate the excess portions (A&E-
9 3NCP). Staff and the OPC used Staff's TOU allocators, but the OPC modified the
10 input values slightly so that its allocators are shifted beyond the pure energy values
11 from Staff's. The COS studies contained other differences, of course, and those will
12 be discussed later in my rebuttal testimony, but it was the fixed cost allocator, that
13 accounted for the vast majority of variance between the parties' COS studies.

1 Q. What are the consequences of these differences?

2 A. The impact of the TOU allocators is enormous. For instance, Aquila's COS study
3 found that additional revenue totaling \$13,987,154 should be collected from the
4 residential classes to bring them to a level return of 8.617%. Staff's COS study found
5 that \$5,382,207 should be collected from this same class. This difference of
6 \$8,604,947 is mostly due to Staff's use of an energy allocator and Aquila's use of an
7 energy-weighted demand allocator to distribute fixed costs.

8 **Allocation of Variable Production Costs**

9 Q. What are variable production costs?

10 A. The operating costs and expenses which vary with of the volume of energy
11 transactions are considered variable costs. For example, fuel expenses or purchased
12 energy costs are variable costs because they rise and fall in a direct relationship with
13 increased and decreased energy use.

14 Q. Please explain?

15 A. In a process similar to that described above for account 314, I collected data for FERC
16 account 555.1 Purchased Power: Energy, and combined it with system energy data for
17 the calendar year 2002 in table 4 on the following page.

18 Q. What does this table show?

19 A. The table shows a clear correlation between the purchased energy costs in account
20 555.1 and the system energy and peak demand. This relationship is even more
21 apparent when viewed on a graph as in Rebuttal Schedule DLS- 2.

Month	Account 555.1 Purchased Energy (\$)	System Energy (MWh)
Jan	\$2,106,721	462,943
Feb	\$4,602,240	394,158
Mar	\$4,623,603	389,893
Apr	\$1,230,246	341,990
May	\$3,091,024	376,136
Jun	\$3,632,959	486,866
Jul	\$8,522,646	560,208
Aug	\$9,967,512	535,540
Sep	\$2,338,507	423,343
Oct	\$2,039,436	369,551
Nov	\$2,083,441	374,113
Dec	\$2,196,597	439,078

Table 4: 2002 Account 555.1 changes compared to energy.

- 1 Q. How are variable costs usually classified?
- 2 A. Variable costs are usually classified as energy.
- 3 A. How should variable costs be allocated?
- 4 A. Variable costs are usually distributed using an energy allocator.
- 5 Q. Did Staff use an energy allocator to distribute variable costs?
- 6 A. Yes. Staff used the same TOU allocators to distribute variable costs as they used to
- 7 distribution fixed costs. As I have already explained, the assumptions, calculations,
- 8 and particularly the application of the TOU allocators show them to be energy
- 9 allocators.
- 10 Review of OPC's COS Study
- 11 Q. Have you reviewed the COS study that was performed by the OPC?
- 12 A. Yes I have.
- 13 Q. Have you discovered anything in that COS study that leads you to believe the OPC
- 14 study contains errors and therefore cannot be relied upon?

- 1 A. Yes. In direct testimony, OPC witness Meisenheimer explains that her COS study
2 distributes fixed production costs on a TOU allocator similar to Staff's claiming,
3 "Both demand and energy characteristics of a system's loads are important
4 determinants of production plant costs."¹¹ By this statement, witness Meisenheimer
5 admits to holding the same erroneous assumptions regarding fixed costs as does Staff.
6 Specifically, that demand and energy characteristics of a system's loads determine
7 fixed costs. Witness Meisenheimer has modified Staff's TOU allocators to achieve a
8 "demand" allocator which is shifted to the extreme side of the energy allocator values.
- 9 Q. Please explain.
- 10 A. In general, when costs are allocated demand, customer classes with a low load factor
11 will be allocated a greater percentage of the costs. This is considered appropriate
12 because low load factor classes bear more of the responsibility for peak demand costs.
13 Conversely, when costs are allocated on energy, customer classes with a higher load
14 factor are allocated a greater percentage of the costs. Again, this is considered
15 appropriate because high load factor customers are responsible for a greater portion of
16 the energy costs. In general, residential and small general service customers make up
17 the majority of low load factor customers, and large general service and large power
18 service customer make up the majority of high load factor customers.
19 If a COS analyst distributes demand related costs using an allocator based on energy,
20 the large general service and large power service classes would receive an
21 inappropriately large portion of these costs. So, if a pure energy allocator was used to

¹¹ Direct Testimony of Barbara Meisenheimer, pg. 5, lines 20 - 21.

1 distribute demand related costs, the large general service and large power service
2 classes would receive and even larger percentage of these costs even though they are
3 *not* the classes primarily responsible for those costs.

4 The changes made by witness Meisenheimer to Staff's TOU allocator has resulted in a
5 "demand" allocator which distributes more of the fixed costs to the large customers
6 than would have resulted if using a pure energy allocator.

7 Witness Meisenheimer makes no attempt to explain these changes except to say that
8 the method is a "reasonably close approximation to the TOU method which the
9 Commission has previously determined reasonable¹²".

10 Q. What else have you discovered?

11 A. OPC witness Meisenheimer provided work papers which support her direct testimony
12 schedules. In one of those work papers¹³, I found that the basic energy and demand
13 data does not match that used by Aquila or Staff in the COS performed by those
14 parties. These erroneous demand and energy values serve as inputs to the final
15 calculation of the TOU allocators thereby adding inaccuracy to the faulty assumptions.

16 Q. Please explain.

17 A. The work papers of the OPC show the calculation of the Average and 12 month non-
18 coincident peak ("A&P-12NCP") allocator that is subsequently used to distribute fixed
19 costs. In the very first step of the calculation, the OPC collects data in a table titled
20 "NCP Demands". The NCP demand for the Residential class in the month of January,
21 2002, is given as 525.553 MW. This value is the demand at the generator which

¹² Id. pg. 6, lines 1-2.

¹³ File 'MPS Direct ER-2002-324-2005.xls', tab 'WP-MPSAnnEnergyGen'

1 means that losses have been taken into account. Aquila's corresponding demand
2 values are; System CP of 512.108 MW, Class NCP of 639.607MW, and Customer
3 NCP of 1,323.242 MW. The OPC's NCP demand values do not match any of those
4 used by Aquila in their COS study, but they came closest to the Aquila's system CP
5 values.

6 Later in its calculation of the A&P-12NCP allocator, the OPC relies on data which it
7 labels "CP Demands", and which are clearly totaled for all classes. Here again, the
8 values do not correspond to those used by Aquila in its COS study. The errors in the
9 inputs to the OPC's calculations, along with the faulty assumptions regarding the
10 determination of fixed costs, makes the OPC's COS study unreliable.

11 Q. What other inconsistencies did you find in the OPC's COS study?

12 A. OPC witness Meisenheimer's direct testimony regarding the allocation of distribution
13 plant contains a number of inconsistencies and errors.

14 Q. Please explain.

15 A. With respect to the allocation of distribution plant, OPC witness Meisenheimer states,
16 "... with the exception of service drops and meters, most of the facilities between the
17 utility customer's point-of-service and the distribution substation are shared facilities.
18 *Since no portion of such facilities are directly related to the number of customers, the*
19 *associated costs are best classified as demand related, rather than customer*
20 *related.*¹⁴ Yet, on the next page of her direct testimony, witness Meisenheimer
21 explains that she did, in fact, classify a significant portion of these distribution costs as

¹⁴ Direct Testimony of Barbara Meisenheimer. pg. 6, line 23 through pg. 7 line 4 (emphasis added).

1 customer. Witness Meisenheimer also distinguishes between primary and secondary
2 distribution plant, but that distinction only makes the logic behind the OPC's
3 classification of distribution plant all the more confusing.

4 Q. How does the OPC's distinction of primary and secondary distribution make the logic
5 behind their classification more confusing?

6 A. OPC witness Meisenheimer contends that no portion of certain distribution facilities
7 should be classified as customer. Specifically, witness Meisenheimer is referring to
8 FERC accounts 364 through 368. Surprisingly, witness Meisenheimer then classifies a
9 significant portion of these facilities as customer, but for *secondary* distribution only.
10 She classifies the entire primary system as demand. Witness Meisenheimer does not
11 attempt to explain her reasoning behind her classification process so one is left to
12 wonder if this inconsistency is an oversight or intentional.

13 What we do know is that by classifying secondary distribution costs as both customer
14 and demand, witness Meisenheimer is admitting that at least *some* of the distribution
15 system was installed to meet the customers need for service rather than the demand,
16 even though in direct testimony she argues against this. By classifying the primary
17 system only as demand, witness Meisenheimer is suggesting that that *none* of the
18 distribution system was constructed to meet the customers need for service rather than
19 the demand, which argues against her classification of secondary plant.

20 The underlying assumption behind this type of inconsistency appears to be that the
21 classification of plant as customer or demand is dependent on its operation at primary
22 or secondary voltages.

23 Q. Does the operating voltage of plant determine how it will be classified?

1 A. No. The NARUC manual says, "Distribution plant Accounts 364 through 370 involve
2 demand and customer costs. The customer component of the distribution facilities is
3 that portion of costs which varies with the number of customers. Thus, the number of
4 poles, conductors, transformers, services, and meters are directly related to the number
5 of customers on the utility's system¹⁵". Nowhere in the NARUC manual is it
6 suggested that voltage level plays a role in determining the classification of
7 distribution plant, nor have I ever heard of this idea being discussed. The proposition
8 suggested by the OPC is, to my knowledge, unsupported. Thus, the OPC has created a
9 labyrinth of inconsistencies by first insisting that "no portion" of distribution facilities
10 are customer related, then classifying a significant portion of those facilities as
11 customer related, and *then* refusing to classify *another* portion of those same facilities
12 simply because of its operating voltage.

13 **Additional Concerns with COS Studies**

14 Q. What other concerns do you have with the COS studies performed by the other parties
15 in this case?

16 A. I will mention a few additional concerns, but will do so with the understanding that
17 some or all of these may have already been addressed in the other parties' COS studies
18 as a result of discussions during the settlement conference.

19 Q. Please proceed.

20 A. In many of the COS studies presented with direct testimony, other parties neglected to
21 split the costs of Account 368; Distribution Transformers into its primary and

¹⁵ NARUC manual, pg 90.

1 secondary components. Every party except Aquila modeled their COS studies with
2 transformer costs allocated to the secondary customers. Since this account is also used
3 to track the costs of capacitor banks which maintain the power factor of the primary
4 distribution system, Account 368 should be split into the primary and secondary
5 components and allocated appropriately.

6 Also, Staff did not assign primary distribution costs to the lighting class, based on the
7 assumption that Account 373 contains the distribution costs for lighting. While it is
8 true that Account 373 contains distribution cost for lighting, the account only contains
9 secondary distribution costs. The lighting class should also receive a portion of the
10 primary distribution costs as well.

11 **Recommendations and Conclusion**

12 Q. What is your recommendation to the Commission with respect to the COS studies?

13 A. Based on the evidence presented in my rebuttal testimony, the following facts should
14 be consider.

15 1. Staff's fixed costs TOU allocator was misapplied to the fixed production and
16 transmission costs of MPS's entire system. Time-differentiated allocation
17 methods normally identify a "base level of load" and a "base generation mix" to
18 identify as energy. Staff did not identify these critical components, but instead
19 identified the system's total non-coincident peak as the "base level of load", and
20 every generation unit as the "base generation mix". By doing so, Staff distributed
21 all fixed production and transmission costs using an energy allocator.

22 2. The OPC used a modified TOU allocator which contains all of the errors
23 described in item 1 above. However, the OPC has, without explanation, modified

1 those allocators to push the values to the extreme, shifting fixed costs away from
2 the classes that incurred those costs. By doing so, the OPC is misapplying an
3 extreme and unexplainable allocator. In addition, the OPC's calculation of the
4 TOU allocators includes demand data that is different than that used by Aquila
5 and Staff in their COS studies.

6 3. Aquila has developed a consistent and appropriate COS study which has resulted
7 in a reasonable shift of revenues between the classes, and which contains none of
8 the obvious and serious errors of Staff's and the OPC's COS studies.

9 Based on these facts, I recommend that the Commission adopt Aquila's COS study
10 and use the resulting revenues as a basis for designing new rates in this case.

11 Q. Does this conclude your rebuttal testimony?

12 A. Yes.

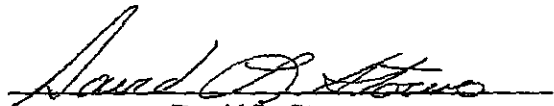
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of an Examination of Class Cost of Service) Case No. EO-2002-384
And Rate Design in the Missouri Jurisdictional Electric)
Service Operations of Aquila, Inc., formerly known as)
UtiliCorp United Inc.)

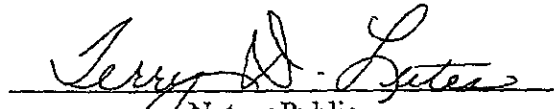
County of Jackson)
State of Missouri) ss

AFFIDAVIT OF DAVID L. STOWE

David L. Stowe, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying testimony entitled "Rebuttal Testimony of David L. Stowe;" that said testimony was prepared by him and under his direction and supervision; that if inquiries were made as to the facts in said testimony and schedules, he would respond as therein set forth; and that the aforesaid testimony and schedules are true and correct to the best of his knowledge, information, and belief.


David L. Stowe

Subscribed and sworn to before me this 12th day of October, 2005.


Notary Public
Terry D. Lutes

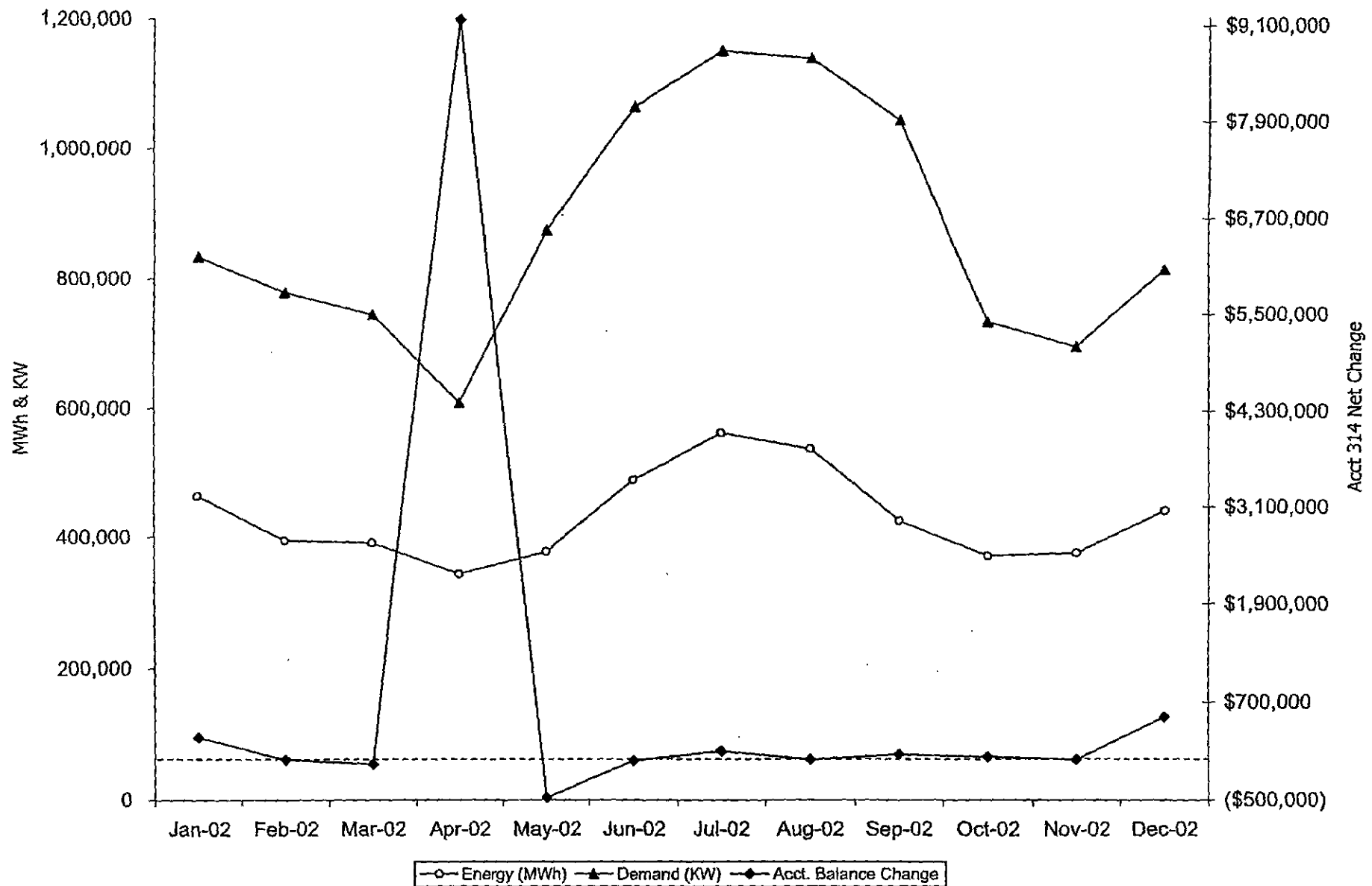
My Commission expires:

8-20-2008



TERRY D. LUTES
Jackson County
My Commission Expires
August 20, 2008

Production Fixed Account to Energy & Demand Comparison



Purchased Energy to Energy & Demand Comparison

