

1 PUBLIC SERVICE COMMISSION
2 STATE OF MISSOURI
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5 TRANSCRIPT OF PROCEEDINGS
6 On-the-Record Presentation
7 September 22, 2016
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9 Jefferson City, Missouri
10 Volume 11
11
12 In the Matter of KCP&L)
Greater Missouri Operations)
13 Company's Request for)
Authority to Implement a) Case No. ER-2016-0156
14 General Rate Increase for)
Electric Service.)
15)

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17 DANIEL R.E. JORDAN, Presiding,
SENIOR REGULATORY LAW JUDGE.

18
19 DANIEL Y. HALL, Chairman
STEPHEN M. STOLL,
20 WILLIAM KENNEY,
SCOTT T. RUPP,
21 MAIDA J. COLEMAN,
COMMISSIONERS.

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1 P R O C E E D I N G S

2 (WHEREUPON, the on-the-record
3 presentation began at 10:41 a.m.)

4 JUDGE JORDAN: Good morning,
5 everyone. We are on the record. The Commission is
6 calling the action in File No. ER-2016-0156. This
7 is in the Matter of KCP&L Greater Missouri
8 Operations Company's Request for Authority to
9 Implement a General Rate Increase for Electric
10 Service.

11 I'm Daniel Jordan. I'm the
12 Regulatory Law Judge assigned to this case. I'll
13 ask everyone to silence their cell phones. You
14 don't have to turn them off, but please silence
15 your cell phones during this proceeding.

16 This proceeding is an on-the-record
17 presentation regarding two documents that the
18 Commission has received. One of them is titled
19 Nonunanimous Stipulation & Agreement Regarding
20 Pensions and Other Post-Employment Benefits, and
21 the other one is titled Nonunanimous Stipulation &
22 Agreement.

23 An on-the-record presentation is
24 something like enhanced oral argument. The parties
25 will receive inquiries from the Bench, meaning the

1 Commissioners and perhaps myself, with regard to
2 these documents.

3 I will start by taking entries of
4 appearance, and we will begin with the Applicant,
5 KCP&L Greater Missouri Operations.

6 MR. FISCHER: Thank you, Judge. Let
7 the record reflect the appearance of Robert J.
8 Hack, Roger W. Steiner and Jim Fischer on behalf of
9 the Applicant today.

10 JUDGE JORDAN: Thank you. And for
11 Staff?

12 MR. WILLIAMS: Nathan Williams.

13 JUDGE JORDAN: Thank you. For the
14 Office of Public Counsel?

15 MS. MAYFIELD: Good morning. Cydney
16 Mayfield for the Office of the Public Counsel.

17 JUDGE JORDAN: Thank you. For MECG?

18 MR. WOODSMALL: David Woodsmall on
19 behalf of MECG.

20 JUDGE JORDAN: Thank you. For the
21 Division of Energy?

22 MR. ANTAL: Good morning, Judge.
23 Alex Antal for the Missouri Division of Energy.

24 JUDGE JORDAN: And I also see that
25 the City of St. Joseph is present.

1 MR. STEINMEIER: Thank you, your
2 Honor. Please let the record reflect the
3 appearance of William D. Steinmeier on behalf of
4 the City of St. Joseph, Missouri.

5 JUDGE JORDAN: And do I see someone
6 for -- go ahead.

7 MR. LINHARES: Good morning, Judge.
8 Andrew Linhares for Renew Missouri.

9 JUDGE JORDAN: Thank you very much.
10 And is there anyone else who would like to enter an
11 appearance this morning?

12 (No response.)

13 JUDGE JORDAN: Okay. I think we have
14 some preliminary matters. I think our order will
15 be mostly questions from the Bench. I understand
16 that GMO has an opening statement that will address
17 a lot of the Commissioners' questions.

18 MR. FISCHER: Judge, yes, we do. We
19 were going to address the consolidation issue. If
20 there are other questions, we'll be happy to
21 address those, too.

22 JUDGE JORDAN: Very good. And Staff?

23 MR. WILLIAMS: Yes. This morning --
24 well, it hasn't been filed yet, but I've
25 distributed to the Commissioners and to the parties

1 who are here billing determinants that are from the
2 worksheet that's incorporated by reference into the
3 Stipulation & Agreement, and that will be filed
4 with the Commission later today.

5 JUDGE JORDAN: Okay. Thank you. Any
6 other preliminary matters before we begin with the
7 opening statement of GMO? Not hearing any,
8 counsel, you may proceed.

9 MR. FISCHER: Thank you, Judge. May
10 it please the Commission? My name is Jim Fischer,
11 representing GMO in the case.

12 With your permission, I'd like to
13 show you a few slides that address the
14 consolidation of the rate jurisdictions of L&P and
15 MPS and take any questions that you might have
16 about the stipulation itself. This rate case
17 was --

18 CHAIRMAN HALL: Excuse me.
19 Mr. Fischer, do you have those as handouts by
20 chance?

21 MR. FISCHER: I can get you some
22 here.

23 MR. WILLIAMS: Judge, before we went
24 on the record, you pointed out the possibility of
25 an error in the Stipulation & Agreement.

1 JUDGE JORDAN: Yes, counselor. Would
2 you like to note that on the record?

3 MR. WILLIAMS: Yes, please. In the
4 first sentence under the total revenue requirement,
5 there's a reference there to paragraph 11 sub 4. I
6 believe that should actually be paragraphs 11 sub 4
7 and 11 sub 5.

8 JUDGE JORDAN: And 11 sub 5. Thank
9 you.

10 MR. FISCHER: Judge, I've got one in
11 color and one in black and white. I can get some
12 more if that would --

13 CHAIRMAN HALL: We can share one.

14 MR. FISCHER: I don't have too many
15 slides, but there are some numbers, so that might
16 be helpful.

17 CHAIRMAN HALL: Thank you.

18 MR. FISCHER: As I started to say,
19 this rate case was required to be filed by GMO in
20 order to retain the ability to use the fuel
21 adjustment clause mechanism. That's part of the
22 Commission's rules. And the company has observed a
23 softening of the cost of service elements between
24 the projections that were originally used in their
25 original filing and the actual numbers that were

1 trued up.

2 The Stipulation & Agreement will
3 allow, which we believe is one of the major
4 elements of the Stipulation, the consolidation of
5 the rates between the L&P district and the MPS
6 district. The overall increase is modest. It's
7 only point -- 0.41 percent, not including the
8 mitigation costs.

9 The Stipulation will allow the
10 consolidation of rates between the two rate
11 districts, and as I mentioned, it's a small
12 increase overall, point -- \$3 million or
13 .41 percent prior to the impact.

14 The parties are recommending that the
15 rate districts be consolidated. That would combine
16 these two districts which are on the map. The
17 northern district is the L&P district, and the
18 southern district is the MPS district.

19 You can see down here at the very
20 bottom, the average residential price between the
21 two districts, and it's quite close, 10.8 versus
22 10.5. So we were already starting with rates that
23 were on average very close.

24 But then the question would become,
25 why should we consolidate? In the last GMO rate

1 case, which was ER-2012-0175, the company agreed to
2 conduct a consolidated -- or excuse me -- a
3 comprehensive study to review the rate impacts of
4 consolidating the districts.

5 Based upon the results of that
6 comprehensive study, GMO and the other parties now
7 have concluded that it is feasible to merge the two
8 rate structures into one. The rates and the rate
9 structures are similar, and the rates themselves
10 are closely aligned, so it makes it easy or easier
11 to consolidate those into one rate structure.

12 The total impact of a simple
13 consolidation, moving the customers either from the
14 MPS district to the L&P district or vice-versa,
15 that were identified in the rate impact study were
16 only a negative 5.78 percent to a positive
17 2.98 percent, depending on which direction you were
18 moving. So they were already very close.

19 And then when we're talking about a
20 revenue increase in this case of only 0.14 percent,
21 that didn't really impact our ability to
22 consolidate the rates.

23 The consolidation reflects a
24 significant effort, though, by many of the parties
25 in this room to help guide and provide feedback

1 concerning the proposals that we're asking you to
2 approve.

3 This slide shows a little -- talks a
4 little bit about the joint effort. GMO used
5 advanced software and modeled the impact of
6 consolidation in the rate design that is being
7 offered in this case.

8 This detailed information was
9 provided and shared with all the parties in a
10 series of meetings and technical conferences.
11 There were five meetings prior to the filing of the
12 case where they talked about the development of the
13 study and how it would be done, and then we had
14 three technical conferences that were scheduled as
15 a part of the procedural schedule.

16 But then after that, we've had ten
17 meetings subsequent to the technical conferences
18 trying to discuss all of the issues that we --
19 particularly focused on minimizing any adverse
20 impacts on individual customers.

21 And we'd like to formally thank many
22 of the parties that are in this case for all of
23 their constructive and helpful input into the
24 various technical meetings and subsequent meetings
25 that we had. It was really a monumental effort by

1 all of these parties, and I want to personally
2 thank all the parties that spent so much time in
3 the room with us to go through the issues. I'm not
4 going to list them individually, but everybody
5 knows who they are, and we really appreciate the
6 monumental effort that went into and the
7 discussions around this particular issue. Thank
8 you for working so hard to get us to this point.

9 And as I mentioned, at this point all
10 the parties are recommending or at least not
11 opposing a consolidation of the rate jurisdictions.

12 This slide talks about the building
13 blocks that went into the requested consolidation,
14 starting with the time-tested rate design
15 principles that we've used for many years that have
16 been proven to be successful.

17 We sought to improve or evolve the
18 rate design by considering the current structures
19 as the building blocks or beginning points, picking
20 the best elements from the current rate structures
21 to form a new rate structure, while not really
22 introducing wholly new concepts into the rate
23 structure.

24 We established common customer
25 classes resulting in different ways that MPS and

1 L&P defined their customer classes. We defined a
2 rate structure that would ensure the appropriate
3 levels of revenues would be produced, which of
4 course was very important to the company, while
5 improving customer equity and fairness and
6 recognizing the importance of the summer season and
7 the winter season with our -- with the summer
8 peaking utility that we have.

9 Finally, the bulk of our time, as I
10 mentioned, was spent looking at ways to minimize
11 the adverse impacts on individual customers. And
12 here I think I've -- this slide just generally
13 lists the benefits of consolidation. The biggest
14 benefit's in the middle there, consistency.

15 The benefits resulting from this
16 consistency would include improved customer
17 communication and understanding through the
18 development of a single set of rates, alignment to
19 the supporting costs of the rates across both
20 jurisdictions, and there would be improved
21 operational efficiency resulting from consistent
22 operational practices across the entire GMO service
23 territory.

24 In addition, GMO has proposed to
25 combine the two fuel adjustment clauses for the

1 different rate jurisdictions into one common GMO
2 FAC for ease of revenue and application. There are
3 also significant benefits to the business practices
4 and recordkeeping of only having one jurisdiction
5 rather than two.

6 And finally, the timing of the
7 consolidation, in our opinion, is right because the
8 rates are already very similar and there won't be
9 widespread adverse impacts by consolidating in the
10 case. So we believe the time is right now to
11 consolidate MPS and L&P and realize the benefits of
12 the single jurisdiction, and we appreciate the
13 parties in this case recommending consolidation in
14 the case.

15 If we go to the class level impacts,
16 this particular slide shows how the rate increase
17 itself was spread. The parties agreed to spread it
18 on an across-the-board basis. Of that \$3 million
19 overall increase, about half, 1.5 million, goes to
20 residential class and the remaining increases go
21 across the board to the other classes.

22 This slide, I'd like to focus on this
23 lower block. It shows that for the residential
24 class, if you go to the L&P district, the
25 residential general use rates and the space heating

1 rates go up by 0.64 percent and the space heating
2 rates by .059 percent respectively, and that
3 includes the overall increase of the .41 percent.
4 So you can see the effect of the consolidation on
5 both districts is pretty minimal.

6 Similarly, if you go down to the MPS
7 district, the residential general rates go up by
8 .44 percent, and there's a reduction of .48 percent
9 for the space heating customers in the MPS
10 district.

11 Then if we go to the residential rate
12 slide here, this is designed to show you just
13 really that most of the -- most of the residential
14 are right around zero, zero impact level. It shows
15 you a distribution. There are a few outliers, both
16 increases and reductions, but for the most part
17 they're all within the zero area there between
18 10 percent increase or 10 percent reduction. Most
19 of them are right around zero.

20 We did have a residential mitigation
21 program that we've agreed to as a part of the
22 Stipulation, and under that program a residential
23 customer that experienced annual increases of more
24 than \$20 above a 5 percent annual increase would be
25 eligible for mitigation provided that their total

1 credit would be -- is more than \$40 annually.
2 Those customers will receive the first year
3 mitigation credit on -- in the July '17 billing
4 cycle, and then the increased estimate shall be
5 computed based upon the billing determinants
6 reflected in 12 months ended October 2016.

7 I asked today just how many we
8 expected to have in that category, and we're only
9 talking in the residential class about 50 to 60
10 customers. So there's not very many folks that are
11 even going to be adversely impacted enough to come
12 under our mitigation program.

13 We also have a similar program for
14 the nonresidential class. Nonresidential customers
15 will be eligible if they also have -- if they're
16 having increases of more than 5 percent, and each
17 class will have a different annual increase in
18 credit minimum more aligned with the bills
19 generally for those larger customers.

20 In that regard, they're estimating
21 that for the small general service class, there
22 will be about 1,300 customers that would be subject
23 to mitigation credits, while the bigger class, the
24 LGS and the LPS class, there's approximately
25 76 customers that we're estimating might be subject

1 to mitigation.

2 All customers would be assigned two
3 new rates. The customers would be individually
4 evaluated and assigned to the rate that minimizes
5 the annual amount they would pay. So there's a
6 best fit process, is what we call it, where it's an
7 iterative process to make sure the customers are on
8 the best rate.

9 And if it's approved, the new
10 consolidated rates would apply to service received
11 on or after December 22nd, 2016, although the
12 implementation process of getting to the best fit
13 for all these customers is going to begin as soon
14 as we get an indication that this plan is going to
15 be approved.

16 With that, I'd take any questions
17 that you might have about the consolidation issue
18 or other provisions of the Stipulation & Agreement.

19 JUDGE JORDAN: We'll go to
20 Commissioner Stoll. Any questions?

21 COMMISSIONER STOLL: Yes. Let me go
22 ahead. On the nonresidential rate design, and I'm
23 on page 7 of the Stipulation, and if -- it says
24 here that the adjustment, five lines down, revenues
25 defined by this stipulation adjustment, the rate

1 revenues to account for any deviation. Probably
2 should have read more of that.

3 But if there is an under-recovery,
4 does this shift the cost of that delta only to
5 other nonresidential customers, or how is that
6 done?

7 MR. FISCHER: Well, the company will
8 be absorbing a portion of that, I think 25 percent
9 for the residential and small general service and
10 50 percent for the LG and LP part of that
11 mitigation effort, but then the remainder will be
12 recovered from the classes.

13 Okay. I'm going to ask Tim as the
14 technical expert to come forward and make sure I'm
15 on the right page here.

16 COMMISSIONER STOLL: Okay. Very
17 good.

18 MR. FISCHER: This is Tim Rush,
19 director of regulatory.

20 JUDGE JORDAN: Okay. Hang on just a
21 second. Since you're going to be testifying, I
22 will swear you in.

23 (Witness sworn.)

24 MR. RUSH: The section you're talking
25 about is the actual rate design itself. Okay. And

1 what we've done, we've established a number of
2 prices that we think is correct, you know, for each
3 of the small general service, the large general
4 service and the large power classes. But what
5 we're going to do is we're going to take the
6 billing data from 12 months ending July of this
7 year and rerun that to validate that the company is
8 kept whole under those rates.

9 So that will go back -- if there's a
10 shortage or an overage from that rate design that
11 we develop, we will correct it to where it's
12 exactly the amount that it's supposed to be. So
13 that doesn't deal with the mitigation. That's what
14 I was trying to get at.

15 MR. FISCHER: I misunderstood your
16 question. Mitigation is another aspect.

17 COMMISSIONER STOLL: Yeah.
18 Basically, I was wanting to know, does the shift --
19 does this shift cost -- shift cost of the change
20 only apply to the nonresidential customers?

21 MR. RUSH: It does.

22 COMMISSIONER STOLL: Does that shift,
23 that delta just go to those customers or is it
24 spread among other customer classes?

25 MR. RUSH: It will just go to those

1 customer classes so that the correct revenues will
2 come from that class. So it will be to all
3 customers within that class. So the rate design is
4 trying to keep whole at that stage. It's trying to
5 say we've checked and everybody's now on the right
6 rate and here's how it works out and here's the
7 revenue that's going to be produced from that rate.

8 And if there's any deviation, for
9 example, a customer should move to a different
10 class, be on a different rate, then that will shift
11 to that class, but the revenue will be kept whole.
12 And that's the purpose of this piece of the
13 Stipulation.

14 The next piece deals with the
15 mitigation, meaning what we'll do, and we will --
16 the company will absorb some difference in that.
17 That's in that Section 5.

18 COMMISSIONER STOLL: Yeah. Then in
19 Section 5 -- thank you for that answer. Then
20 looking at the mitigation program, is there
21 protection in this program, I guess, to protect
22 against those folks who may be inefficient or don't
23 use conservation methods?

24 MR. RUSH: Okay. The way I would
25 address that is, one of the things that we are

1 purposefully pushing for is educating customers
2 about their usage and things they can do to have
3 better -- a lower price. And so our process
4 essentially is, is an educational process. That's
5 why we're trying to mitigate things and address it
6 in July rather than immediately giving a credit so
7 that we can -- literally we're trying to get it
8 where the impact may be occurring, which would be
9 in the summertime. So our credit that we're
10 looking at for the mitigation of those few
11 customers is trying to address that.

12 Somebody that uses electricity poorly
13 is going to see a higher impact initially because,
14 for example, in this small general service class
15 and the large, we're implementing some certain
16 demand components more in tune to what it's costing
17 us to provide that service.

18 MR. FISCHER: Commissioner, I'd also
19 point out to you a provision on page 5 of the
20 Stipulation that I think it may have been the
21 Division of Energy that asked that we include. GMO
22 as a part of the economic relief pilot program,
23 we're going to be adding a provision to our tariff
24 that requires the applicants agree to, that are
25 eligible, to apply for a weatherization assistance

1 and other assistance programs. So that should also
2 help to encourage efficiency for those folks that
3 are on the low income or on that particular
4 program.

5 COMMISSIONER STOLL: Okay. Very
6 good. That was the next thing I was going to ask
7 about, about the weatherization. That does answer
8 that. Okay. I think that's all right now. Thank
9 you.

10 JUDGE JORDAN: Chairman Hall.

11 CHAIRMAN HALL: Good morning.

12 MR. FISCHER: Good morning.

13 CHAIRMAN HALL: My understanding is
14 that in the company's original application it
15 sought a \$59.3 million increase in the revenue
16 requirement?

17 MR. FISCHER: That's correct.

18 CHAIRMAN HALL: And the Stipulation
19 before us has a \$3 million increase to the revenue
20 requirement?

21 MR. FISCHER: That's correct.

22 CHAIRMAN HALL: Can you help me
23 understand why this Stipulation is in the best
24 interests of the company?

25 MR. FISCHER: Well, as I mentioned

1 early on, there has been a softening of the cost of
2 service elements from the time we filed the case
3 until the true-up data came in.

4 CHAIRMAN HALL: Can you elaborate on
5 that, please?

6 MR. FISCHER: Yeah. The
7 reconciliation showed about a \$55 million
8 difference between the Staff numbers and the
9 company's numbers. The Staff was actually
10 negative, I think, on their final run. We were at
11 about \$48 million.

12 But based upon the numbers as they
13 were coming in with the fuel numbers and all the
14 other cost of service numbers that were softening
15 from the time we filed the case, which were based
16 on somewhat projections depending on what we were
17 expecting to have happen, we made the -- we looked
18 at the numbers and came to the conclusion that it
19 was in the company's best interests to go ahead and
20 settle the case.

21 And, frankly, one of the main
22 benefits to settling this case was so that we could
23 get the consolidation issue resolved, because we
24 needed to get -- have time to -- from the time we
25 settled the case until we implemented rates, to do

1 a lot of work to get the best fit process going.
2 And even though the fact it was a modest revenue
3 requirement increase, it actually helped us to get
4 to our goal to have a consolidated rate structure.

5 CHAIRMAN HALL: So the 55 million
6 discrepancy between Staff's cost of service
7 analysis and the company's original application, is
8 that largely operating expenses or are there also
9 some capital expenses in there as well?

10 MR. FISCHER: It's largely
11 traditional things like ROE was -- let's see. I've
12 got the number. All right. Let me bring up
13 another technical expert.

14 JUDGE JORDAN: Please state your name
15 for the record.

16 MR. IVES: My name is Darrin Ives.

17 (Witness sworn.)

18 JUDGE JORDAN: Thank you.

19 MR. IVES: Chairman, I thought I
20 might address your question from the company's
21 perspective. Mr. Fischer's right. A big part of
22 this process was working through the consolidation,
23 and as we talked about, we've spent a number of
24 months and a number of meetings to do that. It was
25 important for us to get that done.

1 The other thing that I'd mention is,
2 and Mr. Fischer had this in his opening, this was a
3 required case. So when we put the case together,
4 we may not have filed a case if not for the fact
5 that we were coming in in four years. We may have
6 had more time. So timing was kind of dictated by
7 the rules in play.

8 That said, Mr. Fischer's right. We
9 have had a softening of costs compared to what we
10 had originally projected when we filed in the case.

11 CHAIRMAN HALL: And again, when we're
12 talking about softening of costs, we're talking
13 about operating expenses?

14 MR. IVES: Yes. So in particular, a
15 big component of movement was fuel, particularly
16 purchased power. The numbers that we projected
17 that would have impacted base rates in this case,
18 the market cost of that purchased power was higher
19 than where it ended up at the time of true-up
20 pretty significantly. The market's been really
21 soft in SPP and power prices have been really good.
22 GMO's a pretty substantial purchaser of power in
23 the market, so that made a several million dollar
24 movement in our case.

25 Beyond that, in our case we

1 certainly, as you often see in cases, we had
2 differences in positions on ROE and capital
3 structure that are contemplated as part of the
4 movement to the settlement. So there were
5 movements there.

6 And then lastly, we had some other
7 costs that we've talked about a lot in front of the
8 Commission around transmission expenses and
9 property taxes. Our request had some alternative
10 treatment for those costs in it initially.
11 Obviously this Commission has open right now a
12 workshop around alternative treatments. There was
13 a subcommittee effort over at the Legislature that
14 is ongoing around that.

15 So there's some recognition that
16 there are other things going on in that arena right
17 now that may have impacted the final number in this
18 case, too. Certainly we all came to the settlement
19 in different ways, but those are some of the
20 factors that we looked at when we got comfortable
21 with moving forward with the settlement and
22 completing the consolidation.

23 CHAIRMAN HALL: You indicated that
24 but for the requirement to file a rate case under
25 our FAC rule, it is possible that the company might

1 not have filed this case?

2 MR. IVES: In this time, that would
3 have been a possibility.

4 CHAIRMAN HALL: Is there -- is there
5 a way -- and if the answer is no, I understand.
6 But is there a way of kind of ballparking what is
7 in that 3 million increase?

8 MR. IVES: Well, I think it's
9 different for every party to the case probably.

10 CHAIRMAN HALL: How about from the
11 company's perspective?

12 MR. IVES: We certainly have a view
13 and a perspective on it, moving from our case to
14 what's there. Certainly it's -- probably not super
15 excited about publicly talking about that because
16 we all came to the number in a different way. It's
17 impacted by a lot of the factors that we talked
18 about. It's consideration of final outcome on ROE
19 and capital structure. It's consideration of
20 differences in our request for alternative
21 treatments on transmission and property taxes.
22 It's the fuel numbers that we talked about and the
23 implications of that.

24 Those are the major cost pools that
25 probably make up movement from our true-up in this

1 case to where we got comfortable with the global
2 settlement at the 3 million.

3 CHAIRMAN HALL: What's the company's
4 current ROE?

5 MR. IVES: Current ROE for GMO?

6 CHAIRMAN HALL: Correct.

7 MR. FISCHER: Are you talking about
8 last authorized?

9 CHAIRMAN HALL: Yes.

10 MR. IVES: Our authorized, our
11 current authorized is 9.7 at GMO, which came out of
12 the 2012 case.

13 CHAIRMAN HALL: In the last rate
14 case, what did the Commission include in the
15 revenue requirement for rate case expense?

16 MR. IVES: In the GMO case, it would
17 have been --

18 MR. FISCHER: Full amount.

19 MR. IVES: Well, we look at an
20 annualized level based on last several years of
21 cases, is how it was done back in 2012. Ron, do
22 you know ballpark what the number was? We can look
23 it up.

24 CHAIRMAN HALL: Can anyone on Staff
25 answer that question or OPC or anyone else?

1 MR. FISCHER: It would have been
2 amortized or annualized.

3 MR. IVES: It was annualized based on
4 looking at a string of preceding cases, kind of
5 what the look was generally.

6 CHAIRMAN HALL: As was our typical
7 practice, correct?

8 MR. IVES: Yes, that was typical.
9 There were no specific disallowances or no
10 alterations to that process back in the 2012 case.

11 CHAIRMAN HALL: I don't know how long
12 this hearing is going to go on today, but I'd like
13 to have that answer at some point during this
14 hearing.

15 MR. IVES: We'll look it up.

16 CHAIRMAN HALL: Mr. Fischer or any of
17 your technical experts, could you explain the
18 economic relief pilot program to me, which is --
19 it's on page 4 of the Stipulation.

20 MR. FISCHER: Okay. I'll ask Tim
21 Rush to do that. It's a program we've had for a
22 while and we've been making some changes here.

23 JUDGE JORDAN: Please remember to use
24 your microphone. Make sure it's on.

25 MR. RUSH: Okay.

1 MR. FISCHER: It's on the bottom of
2 page 4.

3 MR. RUSH: Bottom of page 4.

4 CHAIRMAN HALL: Let me actually ask a
5 couple questions to frame my area of inquiry. So
6 this is a program that is available to residential
7 customers throughout your service area?

8 MR. RUSH: That's correct, yes.

9 CHAIRMAN HALL: Do -- and this
10 program currently exists?

11 MR. RUSH: It does exist. It's at a
12 lower level currently where the dollars I believe
13 are \$50, that we would pay up to \$50 per month for
14 a customer, and current -- and we're moving that to
15 \$65 per month. It used to be --

16 CHAIRMAN HALL: How many --

17 MR. RUSH: Go ahead.

18 CHAIRMAN HALL: No. I'm sorry.

19 MR. RUSH: It was 185 percent of the
20 federal poverty level, and we're moving that up to
21 200 percent.

22 CHAIRMAN HALL: How many customers
23 currently take advantage of this program?

24 MR. RUSH: I don't have an exact
25 quantity, but it's whatever equates to about the

1 amount of money. We try to provide all of that
2 money. So it would be 780,000 -- it's \$780,000
3 basically divided by 50 divided by 12 would give us
4 an answer. But that would be close to how many
5 dollars we're spending each year.

6 CHAIRMAN HALL: Could someone do that
7 math?

8 MR. RUSH: Take basically 780,000
9 divided by 12 divided by 50, would be the --

10 MR. WOODSMALL: \$1,313.

11 MR. RUSH: That would be 1,300
12 customers.

13 CHAIRMAN HALL: Customers. And if
14 you're going from 185 percent of poverty --

15 MR. RUSH: Poverty level, yes.

16 CHAIRMAN HALL: -- to 200, that's
17 going to reduce that number somewhat?

18 MR. RUSH: That won't reduce it.
19 It's going to \$65 that will reduce the number of
20 participants.

21 CHAIRMAN HALL: Going from 50 to 65
22 will increase the expense of the program, but going
23 from 185 to 200 -- oh, wait. No. Okay. So they
24 both should increase the cost of the program. Do
25 you have estimates? Wait. Does this program work

1 so that once -- once this amount is used, there
2 is -- the program is over for the year, or if
3 you're eligible in January, you're going to get it
4 all year regardless of whether or not you --

5 MR. RUSH: You can get it all year.
6 We have basically not exceeded that amount of money
7 at this stage. You have people that come in and
8 drop off, and we try to continue that program and
9 make it available. But the idea is to get
10 customers back on their feet, to help them out
11 during this time. It's all designed to help the
12 customer that sometimes isn't helped by other
13 programs essentially to meet their need.

14 And we make it available. It goes
15 through the Salvation Army, and they do
16 qualifications to those customers and they help
17 administer that program.

18 The change that we're making in this
19 program is the expansion to make it -- it now will
20 be the same as we did at KCPL in the last rate
21 case. So previously KCP&L was at \$50. This now
22 moves to 65. We moved to 65 at KCP&L in the last
23 rate case for the payment.

24 And it's shared 50 percent from the
25 shareholders and 50 percent from the customers. So

1 we're only asking for approximately \$400,000 from
2 this case because the shareholders pick up the
3 rest.

4 COMMISSIONER KENNEY: Just one
5 follow-up on that. What's the increase in that
6 amount, the 788? What was it last year, or last --
7 the 2012 program?

8 MR. RUSH: I don't have that exact
9 number.

10 COMMISSIONER KENNEY: But is it an
11 increase from --

12 MR. RUSH: It was under a thousand
13 participants last year, up to a thousand
14 participants.

15 COMMISSIONER KENNEY: I know you had
16 the -- I'm just curious. On the 788, is that an
17 increased amount from what the amount was before?
18 I think -- I know we increased it, I think, in
19 KCPL.

20 MR. RUSH: We did increase it at
21 KCP&L. Just one second. It did go up. We can
22 find out shortly how much.

23 COMMISSIONER KENNEY: That's fine.
24 And the next step, this is territory-wide?

25 MR. RUSH: It is territory-wide, yes.

1 COMMISSIONER KENNEY: Didn't OPC or
2 Staff not like that? Because someone's objected to
3 that every time in the past in all other cases. I
4 was just curious.

5 MR. FISCHER: We were happy to have
6 everybody's support.

7 COMMISSIONER KENNEY: Thank you.

8 CHAIRMAN HALL: Is there some legal
9 distinction between this program and the low-income
10 rate, from your perspective?

11 MR. FISCHER: Are you talking about
12 like a Lifeline type based on usage?

13 CHAIRMAN HALL: No. I'm talking
14 about in a couple of recent rate cases, and this is
15 what Commissioner Kenney was alluding to, we
16 instituted or continued some pilot program that had
17 a low-income rate, either an elimination of a
18 customer charge or a reduction of a customer
19 charge. And we asked those companies along with
20 interested stakeholders to analyze the impact in a
21 variety of ways related to the cost of disconnect
22 and reconnect and bad debt.

23 So what I'm wondering is, is there
24 some -- is this essentially a low-income rate?

25 MR. FISCHER: It is a --

1 MR. RUSH: I would say it is designed
2 to help those in need. It is not designed for the
3 entire population. It's designed for those that
4 financially find themselves in a hardship. We have
5 a number of other things. We have Dollar Aid, for
6 example, which is really driven towards low-income
7 also. It's another program that the employees and
8 customers can participate in. The company provides
9 funding also for a Dollar Aid program, which is
10 different than this. We have weatherization
11 programs that we work toward.

12 So there's a variety of things we do
13 that are specific to a customer, not necessarily to
14 a defined population of, okay, these people meet
15 all the criteria of low income; they get a specific
16 rate. But we find that we can offer those rates to
17 customers like that that ask for and need help or
18 are in a situation where they find themselves in a
19 hardship situation.

20 CHAIRMAN HALL: I mean, just to be
21 clear, I am very supportive of this program. I
22 applaud the company and its shareholders for being
23 willing to foot half the bill for it. Make that
24 clear.

25 But my question, and maybe this is

1 for the lawyers in the room, is this essentially a
2 low-income rate?

3 MR. HACK: If I could jump in,
4 Chairman. I'm sorry, Jim.

5 MR. FISCHER: No problem.

6 MR. HACK: It's called a pilot
7 program. It's been in effect for a number of years
8 now. I think there is some concern regarding the
9 lawfulness of straight-ahead permanent low-income
10 rates. The reason the pilot is still in the
11 nomenclature --

12 CHAIRMAN HALL: I'm not sure the
13 record is going to reflect the little --

14 MR. HACK: I will stop the hand
15 gestures. But that's -- we're trying to make sure
16 the program can remain in effect and avoid a legal
17 challenge on the basis that it is a, quote,
18 low-income rate. Because I think there -- under
19 the law, I think there is some exposure there.

20 CHAIRMAN HALL: Okay. Anyone have
21 that rate case expense number yet?

22 MR. WILLIAMS: What I've been
23 provided is that for both districts in the last
24 case, because we didn't have company-wide, so this
25 wouldn't be a company-wide number for rate case

1 expense --

2 JUDGE JORDAN: Microphone, please.

3 MR. WILLIAMS: From the last case, we
4 had districts, so there was an allocation between
5 the districts of the rate case expense. But for
6 total company in the last rate case, the
7 information I've been provided is that it was
8 673,237, which then was amortized over three years,
9 so that what was put in to be collected in rates in
10 the revenue requirement was \$224,412 total company.

11 CHAIRMAN HALL: And did the -- I
12 understand that Staff's position in this case was
13 in support of some type of sharing mechanism
14 consistent with the mechanism that the Commission
15 put in place for the KCP&L case. Did Staff have a
16 specific number for rate case expense in this case?

17 MR. WILLIAMS: Well, we would have
18 had a number at a point in time, but of course it
19 keeps changing. In fact, it's changing now.

20 CHAIRMAN HALL: In the most recent
21 point in time, what was Staff's number?

22 MR. WILLIAMS: I don't know offhand.
23 I think we can acquire that information.

24 CHAIRMAN HALL: Okay. We'll come
25 back to rate case expense a little bit later, then.

1 MR. WILLIAMS: You may want to swear
2 in Mr. Oligschlaeger and ask him a few queries.

3 JUDGE JORDAN: I will do that.
4 Please state your name.

5 MR. OLIGSCHLAEGER: Mark
6 Oligschlaeger.

7 (Witness sworn.)

8 JUDGE JORDAN: Thank you.

9 MR. OLIGSCHLAEGER: And your question
10 is what was the last Staff number or value
11 regarding rate case expense?

12 CHAIRMAN HALL: Exactly.

13 MR. OLIGSCHLAEGER: Okay. I don't
14 have detailed knowledge of it. In a discussion
15 even earlier this morning, the number, the total
16 rate case expense incurred by GMO was in the
17 ballpark vicinity I believe of around 400,000.

18 And I believe if you applied the
19 Staff's proposed methodology of taking the
20 percentage of total rate increase to total rate
21 increase request by the company, I think the
22 percentage of rate case -- or the amount of rate
23 case expense that would be allowed under that
24 method would be in the ballpark of around \$5,000.

25 CHAIRMAN HALL: But the Stipulation

1 does not speak to that issue, correct?

2 MR. OLIGSCHLAEGER: It is silent on
3 that particular matter.

4 CHAIRMAN HALL: Now, if the -- if the
5 current rates include \$224,000 a year for rate case
6 expense and Staff's position was that 5,000 going
7 forward is appropriate, there would have actually
8 been a reduction in the revenue requirement at
9 least regarding rate case expense?

10 MR. OLIGSCHLAEGER: Looking at that
11 item in isolation, that would be correct.

12 CHAIRMAN HALL: Is there anything
13 else that you can tell me to help me understand the
14 relationship between the Stipulation and rate case
15 expense?

16 MR. OLIGSCHLAEGER: I guess all I can
17 say, it was a black box number, so --

18 CHAIRMAN HALL: Is there anything
19 that you can add?

20 MR. WILLIAMS: Well, the only thing
21 I'd point out is, the company alluded to earlier,
22 it came in because it wanted to retain its fuel
23 adjustment clause.

24 CHAIRMAN HALL: I understand that.

25 MR. WILLIAMS: In order to do that,

1 it was going to incur rate case expense.

2 CHAIRMAN HALL: I understand that,
3 and that's -- and I think that is a significant --
4 it was going to be for me a significant factor in
5 determining what would be the appropriate rate case
6 expense.

7 All right. Concerning the
8 Stipulation on page 5 concerning the AMI opt-out
9 program, I'm a little confused. Are the people who
10 are opting out paying this amount or the people who
11 are not opting out paying this amount?

12 MR. FISCHER: The people that do not
13 want AMI meters and we're going to have to require
14 a meter reader to go out to their house, those
15 small number of people that have concerns about AMI
16 meters will be the ones paying for those costs.

17 CHAIRMAN HALL: Do you have any kind
18 of ballpark estimate for how many individuals are
19 going to opt out, realizing that they will have
20 these additional charges?

21 MR. FISCHER: We have one formal
22 complaint filed at the Commission. I understand
23 there have been a handful of other informal
24 concerns. Staff raised the question or the issue,
25 and we agreed to go -- to implement this kind of a

1 program to avoid that. But the future will
2 determine how many are really concerned enough that
3 they would pay the cost of having a meter reader go
4 out for their own individual home.

5 CHAIRMAN HALL: Where are we in the
6 AMI rollout program in terms of customers either
7 with or without the AMI?

8 MR. FISCHER: It's my understanding
9 that AMI is available throughout the company, and
10 this will be an exception if people do that. Is
11 that correct?

12 MR. RUSH: No, it's not. We have
13 rolled it out in both our Kansas City Power & Light
14 Company Kansas and Missouri jurisdictions. We've
15 completed the Kansas City Power & Light area in
16 Kansas. We have completed the Kansas City Power &
17 Light in Missouri. 300,000 cust-- we have like 300
18 to go. Excuse me.

19 CHAIRMAN HALL: 300 customers to go?

20 MR. RUSH: In Kansas City Power &
21 Light Company. In GMO, we have rolled it out to
22 about half of the system. I think we have, did you
23 say 100,000 or so installed at this time, and we
24 have quite a few more to go, but we are nearing
25 completion of that project.

1 CHAIRMAN HALL: Once the -- once that
2 rollout is complete, do you have a -- does the
3 company have a demand response program that it
4 intends to implement with residential customers?

5 MR. RUSH: We have -- with the
6 implementation of AMI, we will have the capability
7 of doing those things. We are currently in the
8 process of implementing a new billing system called
9 CCMB that we've talked about for some time now.
10 That will give us the capability to expand those
11 kind of activities, just as like what you're
12 talking about with demand response or with time of
13 use rates or demand response rates, multiple
14 pieces, and that will be done in a couple of years
15 where we could be able to do those things.

16 We have agreed to do studies in this
17 agreement addressing basically those kinds of
18 things. But as far as immediately implementing
19 them, we do not have that capability.

20 CHAIRMAN HALL: So will the -- will
21 the time -- the time of use rates, that will be an
22 issue in the next rate case?

23 MR. RUSH: It will be, or there will
24 be a rate design case, one of those two, that we've
25 agreed to where we would be addressing those

1 issues.

2 CHAIRMAN HALL: And will a demand
3 response component, will that be in a MEEIA case or
4 will that be in a rate case --

5 MR. RUSH: That can vary.

6 CHAIRMAN HALL: -- or in both maybe?

7 MR. RUSH: It could be in both. I
8 mean, it's according to how you treat the demand
9 response. If you're simply doing it through a rate
10 design piece that implements an overall revenue
11 requirement, you may look at it differently than if
12 you do it through MEEIA, which looks at the
13 difference of the throughput disincentive that you
14 address there.

15 COMMISSIONER STOLL: Can I follow
16 that up?

17 CHAIRMAN HALL: Sure.

18 COMMISSIONER STOLL: My question, is
19 there a cost to the customer for having an AMI
20 meter installed?

21 MR. RUSH: No, there is not. I mean,
22 it's reflected in the overall rates that we --

23 COMMISSIONER STOLL: Reflected in the
24 rate. How much does it cost for an AMI meter? Do
25 you know, roughly?

1 MR. RUSH: I believe the number is
2 \$60.

3 COMMISSIONER STOLL: Not for the
4 meter itself.

5 MR. RUSH: But, I mean, you have a
6 whole infrastructure designed to address that, but
7 it's a very --

8 COMMISSIONER STOLL: Yeah. So --

9 MR. RUSH: That's the technology.

10 COMMISSIONER STOLL: So why would --
11 okay. How do you read the meters now? I mean, if
12 you opt out, there's a \$45 per month meter reading
13 charge. How are they read now?

14 MR. RUSH: Currently they read in the
15 GMO area with meter readers. We have had the
16 technology of automatically reading meters at
17 Kansas City Power & Light for well over ten years.
18 I'm not sure if it's not even in excess of that.

19 COMMISSIONER STOLL: Is that through
20 the meter that's referred to as an AMR?

21 MR. RUSH: That's correct, yes.

22 COMMISSIONER STOLL: Where you have
23 the radio read or whatever?

24 MR. RUSH: This is a newer -- this is
25 the newer technology. This is allowing you to do

1 multiple things with the meter, but it's the same
2 technology as the general technology that's been
3 around that we had when it was purchased as a
4 CellNet product at one point in time, but I believe
5 it's called the AMR also, AMR meters or meter
6 reading.

7 COMMISSIONER STOLL: Why would --

8 MR. RUSH: But when we move to this
9 at the GMO area, obviously we're going to be
10 getting rid of meter readers through the process of
11 that. I mean, that's the major savings you see
12 behind all of this, beyond all of the additional
13 capabilities that it offers.

14 COMMISSIONER STOLL: And so is there
15 currently a meter reading charge or that's baked
16 into the --

17 MR. RUSH: That is currently baked
18 into the overall cost of service, and typically
19 it's in the customer charge itself or the service
20 charge we call it.

21 COMMISSIONER STOLL: Okay. Thank
22 you.

23 COMMISSIONER KENNEY: So these -- so
24 on smart thermostats, you can communicate with the
25 AMI meters, correct?

1 MR. RUSH: You actually can do that,
2 yes. If you set that capability up for this,
3 there's lots of things you can do.

4 COMMISSIONER KENNEY: You can get
5 people to log on and opt out for certain time
6 frames if they have smart thermostats. And then
7 through your MEEIA program aren't you even offering
8 Nest thermostats now to customers?

9 MR. RUSH: Yes.

10 COMMISSIONER KENNEY: And then so --

11 MR. RUSH: But the way the technology
12 is today, it's not necessarily that we're using the
13 meter reading to do that, but we are communicating
14 through -- with, like, Nest and the other products
15 through the thermostat.

16 COMMISSIONER KENNEY: But they don't
17 assimilate with each other?

18 MR. RUSH: They can work together,
19 but they're currently not working together.

20 COMMISSIONER RUPP: I didn't want to
21 go out of turn. Thank you. So your quote to the
22 Commissioner, the Chairman, was you have the
23 capability of doing demand response programs?

24 MR. RUSH: That's correct.

25 COMMISSIONER RUPP: Are you going to

1 do them? You might have the capability, but are
2 you going to do them in the future?

3 MR. RUSH: I think that's dependent
4 on the evaluation of being able to do it for
5 residential customers. We currently have demand
6 response programs for other customers, for
7 commercial customers. We have quite a few of those
8 types of programs. We do have demand response
9 programs where we have demand savings where we put
10 in -- when customers put in air conditioning and
11 other lighting, et cetera, that have demand -- you
12 know, that do reduce it, but actually interacting
13 with a customer where they take an action is not
14 happening in the residential category. It is
15 happening in the commercial category.

16 COMMISSIONER RUPP: So in the
17 residential category, was your position originally
18 to freeze the time of use rates and not proceed
19 further?

20 MR. RUSH: Could you say that again?
21 I'm sorry.

22 COMMISSIONER RUPP: The way I read
23 your testimony was that the company's position was
24 to stop, to freeze your time of use rates and not
25 move forward?

1 MR. RUSH: With those time of use
2 rates, but our intent long-term for time of use is
3 to be able to offer a time of use rate for
4 customers that would be able to utilize the
5 capabilities of the AMI system or the automatic
6 meter reading system as well as be a design that
7 would be workable for the system. Those time of
8 use rates that exist today are 20 years old.

9 MR. FISCHER: That will be part of
10 the effort for the rate design study.

11 COMMISSIONER RUPP: That will be part
12 of the effort in the Stipulation, but the way I
13 read your position early on was that you just
14 wanted to freeze the time of use rates and just be
15 done with, and I didn't see --

16 MR. RUSH: It was not intentional to
17 be done with time of use rates. It was to stop
18 those because we're putting in technology -- the
19 way it operates today is if you are on a time of
20 use rate, we have to have a special meter, we have
21 to have a special meter reading profile to go out
22 and do it. It's not designed to work automatically
23 as we will have it installed.

24 COMMISSIONER RUPP: So that goes back
25 to my question on the capability of those types of

1 programs. So I want to hear from the company
2 that -- you will have the capability to do that in
3 the future, but I want to hear, is it your intent
4 to move forward towards some type of time of use
5 rate option for people that has been designed with
6 newer numbers that is something that actually they
7 would -- might choose to participate in?

8 MR. IVES: I'd answer that real
9 quickly. It is our intent to continue to look at
10 all those forms. With the advancements in
11 technology, not only from the meters, but when we
12 get our new billing system in, which has much more
13 real-time capability, to address some of these
14 future innovations, we're going to look at all that
15 stuff. We're going to look at time of use rates.
16 We're going to look at demand response.

17 And where we ultimately come out will
18 be a product of how it works for our particular
19 customers, how our interactions go with the other
20 stakeholders in the state as we're working through
21 that process.

22 COMMISSIONER RUPP: So in your study
23 that you're going to do, are you going in your next
24 rate case or once you've had your data and then
25 you -- whenever you come in next, are you going to

1 have a study that says here is the results and this
2 is what we're going to do, or are you going to come
3 in and say, we are proposing to do a study that
4 then kicks it down the road another three years?

5 MR. IVES: We're going to do the
6 study in advance of the next filing, and we will
7 use it to form the basis of the filing in the next
8 case.

9 COMMISSIONER RUPP: So in the next
10 time you come before, you will have a plan for time
11 of use rates for your customers with -- that they
12 could implement if it is -- if it is approved by
13 the Commission?

14 MR. IVES: We'll have a plan that
15 could include time of use. It will depend on the
16 outcome of the study, the interactions that we have
17 with stakeholders as we work through that study as
18 to what makes the most sense for customers, whether
19 it's time of use, whether it's demand response,
20 whether it's other factors that have continued to
21 evolve in the industry that make sense.

22 We're going to look at all options
23 and then figure out what makes the best sense for
24 customers for proposal. Could be time of use.
25 Could be demand response.

1 COMMISSIONER RUPP: Now, are you
2 going to come back with, we didn't feel it was in
3 the best, so we're not going to offer it to our
4 customers, or are you going to approach it in the
5 fact of we're going to offer to our customers and
6 this is the parameters it's going to be? Are you
7 going to decide for the customers if it's good or
8 not or are you going to give them the option?

9 MR. IVES: That's a difficult
10 question to answer definitively without having
11 completed the study, if the study comes back and it
12 doesn't look like it's feasible or makes sense or
13 we have a view from stakeholders after we work
14 through it that it's not the right time. It's hard
15 to make a definitive determination until we do the
16 work.

17 What I can tell you is we are looking
18 across the country at what makes sense for
19 customers on all those fronts from a customer
20 experience standpoint and from a customer -- a
21 customer ability to take control of their energy
22 usage. This is another forum where we'll be
23 working with that same view in mind.

24 COMMISSIONER RUPP: I appreciate
25 that, because I remember Mr. Hack's comments in the

1 workshop the other day, quote was time of use rates
2 are the wave of the future for our customers.
3 So I hear that statement of what's coming, so I
4 just want to be sure that when we have our next
5 time in front of us, that there is something put in
6 front of us for us to look at that has not been
7 predetermined whether or not it's good for people
8 or not if your company believes it is kind of the
9 wave of the future.

10 MR. IVES: I think it is. I think
11 customer involvement, it absolutely is, but we may
12 be three or four years down the line. There may be
13 continued evolution in opportunities for impacts to
14 customers that take place not just here but across
15 the industry, and we would intend to look at all
16 that stuff as we move forward.

17 That's why I'm hesitant to pin down
18 to one specific thing because the goal would be to
19 look at a broad array of opportunities and come
20 with what is the right commonsense package for
21 customers moving forward.

22 COMMISSIONER RUPP: I'm not trying to
23 tell you you have to do time of use, but from --
24 you're spending a lot of money on AMI meters to get
25 rid of meter readers, which is great. But if

1 you're not going to use that technology, you could
2 have went with the older AMR meters. And so if
3 you're going to ask ratepayers to pay for that,
4 then let's utilize the technology. It's not going
5 to be for everybody, but at least provide them that
6 opportunity and -- and I just -- I have a concern
7 that we get these stipulations and these -- and
8 then the next time you have a case, well, it's a
9 stipulation and we didn't think it was good. We're
10 going to study again. The next thing you know, I'm
11 out of the Commission in two and a half years and
12 we still have just kicked the can every time down
13 the road.

14 That's why trying -- I'm not trying
15 to pin you on one type of program, but I want to
16 see something definitive with numbers and options
17 for people rather than let's continue to study this
18 forever and then eventually do something when
19 98 percent of the population has already done it.

20 MR. IVES: Agree with that. I think
21 that's why the parties felt it important enough to
22 put that type of language into this Stipulation
23 that we need to do that evaluation and we need to
24 move forward. The parties feel that same way.

25 CHAIRMAN HALL: How long -- I could

1 not agree with you more in terms of the amount of
2 money that ratepayers will pay for this technology,
3 if we're not getting something for that technology,
4 then that's inefficient use of ratepayer dollars.
5 One suggestion, and I guess I would be interested
6 in all of the parties' response to this.

7 The study that the company's going to
8 do on time of use rates and other mechanisms that
9 it may employ with regards to the AMI meters, we
10 could require that that report be submitted in a
11 formal fashion to the Commission, the Commission
12 along with other interested parties, and we could
13 look at it and we could decide whether or not we
14 want to bring the parties in for a hearing on that.

15 So, Commissioner, that might be a way
16 to get the kind of accountability that I think
17 you're looking for.

18 MR. ANTAL: Commissioners, if I may
19 add something? I would just point out the first
20 full sentence of page 11 states that GMO will
21 propose rates based on this study no later than its
22 next rate case or rate design case, and that study
23 that it references to, that paragraph starts on
24 page 10, which includes time of use residential and
25 SGS rates, peak rate, electric vehicle time of use

1 rates.

2 So it's our understanding that rates
3 will be proposed regarding these different time
4 differential rate categories.

5 CHAIRMAN HALL: Well, that depends on
6 what the study says, though. The study could say
7 time of use rates are inappropriate. And so I
8 think getting to Commissioner Rupp's concern, which
9 I share wholeheartedly, can we -- would the parties
10 oppose, would the company oppose submitting that
11 report formally to the Commission?

12 MR. IVES: So if I can, that same
13 paragraph that starts at the bottom of page 10, it
14 says that we will include in our direct filing in
15 the next case or a rate design case the study TOU
16 rates, including critical peak rates, EVTOU. So it
17 already says that we will produce that study as
18 part of our direct filing in either the next case
19 or a rate design case.

20 CHAIRMAN HALL: I think there may be
21 some interest in getting it before the next filing.

22 COMMISSIONER RUPP: And when it says
23 you will submit that, are you going to submit all
24 the data so that other interested parties of the
25 case can look at the data and come to conclusions

1 or are you just going to present the summary of
2 your findings that you have found? How is that
3 doing to be presented? Is it going to be raw data
4 that we can look at and make sure that we're
5 ascertaining the same outcome that you're coming
6 with? Because to Alex's point, yeah, it says
7 they're going to file rates, but I could design a
8 program that no one's ever going to participate in.

9 So I would like to see bang for my
10 buck and also want to see something that actually
11 works and people would participate in rather than
12 the one that you've had for 15 years that we froze
13 other people's moving forward.

14 So how would that study be presented
15 to us? And I completely agree with the Chairman.
16 I'd love to see that beforehand, before the next
17 rate case.

18 MR. IVES: So a couple things.
19 Generally, similar to how we looked at the study
20 that came out of our 2012 stipulation to look at
21 consolidation, that resulted in kind of a full open
22 book view, and we gave -- we gave the study. We
23 gave the underlying support. We went through it
24 with parties. We shared it with them.

25 That's the same thing that would

1 happen here either through the provision of
2 information as we're working through it or through
3 the work papers that come in in support of the
4 study when we make the filing. It's going to be
5 out there and it's going to be available.

6 One thing I want to mention, just to
7 make sure we're clear, I understand that the
8 interest in value for time of use rates or things
9 like that that come out of AMI meters. There are
10 other things that come out of meters than just time
11 of use rates. I mean, they provide better outage
12 support and a number of other things. It's not
13 like a one shot get -- for the Commission or for
14 customers to get value out of AMI meters.

15 I just want to make that clear
16 because we talked about that a little bit here.
17 But better outage maps, better outage response,
18 there are a lot of other reasons why these meters
19 make sense.

20 COMMISSIONER RUPP: And I know I'm
21 probably coming across maybe a little harsh. I
22 have a tendency to do that. I apologize. But I do
23 want to commend your organization for being forward
24 thinking. I like the stuff that you're putting out
25 there. I mean, I see you moving in this direction.

1 So I believe in you that you are moving in this
2 direction.

3 I just want -- we only have these
4 opportunities to talk to you in these rate cases,
5 and so I have to take this time to really hone in
6 on them because every time I try to ask something,
7 it's like, well, you've got to wait until the next
8 rate case, and then it comes up and it just seems
9 like we're just continually moving it down the
10 road.

11 So there are other benefits, I agree
12 with you on that one. And so I strongly encourage
13 you guys to continue being innovative, continue to
14 do the things that you're doing, and find the
15 value, find the choice for customers. It's not
16 going to be for everybody. Look at everything, and
17 let's see what the data says and let's see what we
18 can bring forward to people. And let's -- if we're
19 going to have a program, let's have one that works
20 that actually -- that the people can benefit from.

21 MS. MAYFIELD: Commissioner Rupp and
22 Chairman Hall, I believe that Dr. Geoff Marke may
23 have some information to inform the Commission on
24 this very issue. Judge Jordan, would you like to
25 swear in Dr. Marke?

1 JUDGE JORDAN: I will.

2 (Witness sworn.)

3 DR. MARKE: So I'd offer up that to a
4 large extent this rate design has already been
5 done. In fact, last week in -- part of the problem
6 is that we've got different people at the company,
7 different people within the Commission, even in our
8 own office, that are involved in the IRP process
9 but not necessarily rate design.

10 As part of the IRP process, the rules
11 actually look at rate design, rate design rates,
12 demand side rates. So the company commissioned
13 with the Brattle Group to go ahead and study
14 several different rate design rates, inclining
15 block, demand charges, the time of use charge, and
16 I think there was one else, another dynamic price.

17 All right. That's part of their
18 potential study. That potential study is still a
19 work in progress. We saw the preliminary results
20 last week. So we've already got a sense of, you
21 know, what impact a rate design would have on peak
22 time usage.

23 COMMISSIONER RUPP: Can I stop you
24 right there? If they haven't put in AMI meters to
25 get that amount of data, how are they -- what are

1 they basing this on, the meter reader guy that went
2 out and looking at --

3 DR. MARKE: Historical usage and just
4 modeling.

5 COMMISSIONER RUPP: And would that
6 even be good enough raw data for extrapolating into
7 some type of a demand type study if it's something
8 that's collected monthly, or do you need that
9 hourly feedback from the AMI meter to actually have
10 a solid study to do something?

11 DR. MARKE: There's a broad range in
12 what we talked about here. When we say dynamic
13 price, you can talk about the time of use pricing,
14 that could be on the hour basis. That's something
15 that requires AMI technology.

16 A demand charge, which wouldn't be
17 necessarily on an hourly basis, still requires an
18 AMI meter. Right? And inclining block rate
19 doesn't require any of that. All three of them
20 have an influence on peak time usage and overall
21 energy usage.

22 So I can tell you with a fair amount
23 of confidence that the inclining block rate and
24 preliminary results we saw from that are probably
25 pretty accurate. As far as the time of use, as far

1 as the demand charge, a lot of it comes down to the
2 design. So parties in the potential study don't
3 necessarily agree with how things were modeled.
4 Right? So when they looked at inclining block
5 rates, and I'm generalizing here, we can say
6 there's an 18 percent decrease in overall peak
7 usage. That's huge, right? But then the next
8 question would be, well, what do we mean by
9 inclining blocks, right? How exactly are these
10 blocks set? And, you know, does the customer
11 charge remain the same?

12 So under their modeling assumptions
13 they raise the customer charge to almost \$22.
14 Right? That's, you know, more than a \$10 increase
15 to the current rates. How would that impact, say,
16 MEEIA and energy efficiency? So you've got a lot
17 of moving interdependent parts.

18 There's larger issues about whether
19 or not the company's overall revenue recovery would
20 be impacted from a huge departure from changing
21 rate design, and then you throw on the extra
22 variable of the consolidation within the context of
23 this case.

24 So, you know, and I don't want to --
25 really want to emphasize that this was a Herculean

1 task for all parties to get consolidation right,
2 sort of a once in a lifetime opportunity where
3 rates weren't going to increase overall that we
4 could make the consolidation happen. I think it's
5 everybody's intention to move forward with some
6 sort of time of use -- I know it's our office's
7 intention, I'll tell you that, that, you know, we
8 see -- if ratepayers are going to pay for this
9 service, we want something out of it.

10 And we've got sunk money at this
11 point, right? I mean, 80 percent of the service
12 territory and whatnot has already been inundated
13 with AMI meters. So there's a huge education
14 element to this. You know, people are used to
15 paying for electricity for over a hundred years in
16 a certain manner, so --

17 COMMISSIONER RUPP: So if you allow
18 me to interrupt you again.

19 DR. MARKE: Sure.

20 COMMISSIONER RUPP: So what I'm
21 hearing is, there's studies currently going on.
22 Some of this work has been done, and you guys just
23 came to the table and were able to get
24 consolidation. So now you're going to have a large
25 population that is on the same rate, and then, with

1 the induction of AMI meters to the entire
2 population, you could have data from a consolidated
3 group over a period of time that's all been
4 collected with the maximum amount of data you can
5 to come in in the future with a study that would
6 have homogeneous data that can be extrapolated to
7 the population as a whole on their entire footprint
8 with up-to-date data that's been collected rather
9 than partial hourly data or weekly and partially
10 monthly from a meter reader?

11 DR. MARKE: Yes. In theory, you
12 know, more data, the more precise we could get.

13 COMMISSIONER RUPP: My fear is if
14 there's already a study going on and you're trying
15 to extrapolate data that you're going from a
16 monthly meter reader and you're trying to
17 extrapolate, I can see how an inclining block on
18 it, that -- but how would that intuit any type of a
19 dynamic pricing model, how would that -- would you
20 not need that incremental hourly type of -- or even
21 every 15 minutes or whatever you want look at, to
22 apply the study to that type of pricing model.

23 So that is to my point of, is this
24 studying going to be the raw data so that we can
25 look at it and say, okay, this is -- the way it was

1 collected, what was collected is statistically
2 viable to extrapolate to the population as a whole
3 for this particular type of pricing model? And
4 that's what I'm -- that's what I'd like to see.

5 MR. IVES: So I think the interesting
6 part of this, and Dr. Marke alluded to it, you
7 know, more data is certainly going to be available.
8 The question will be, you know, what that turns
9 into and how we go about it.

10 But we'll certainly have each
11 investment we make, whether it's -- whether it's
12 the AMI meters that can collect that interval data,
13 you know, 15-minute increments, whether it's the
14 meter data management system that kind of manages
15 and controls that, and ultimately the CCMB billing
16 system that unlocks capabilities for us to do more
17 in the billing function. As we get each of those
18 things in, it gives us more access to data and more
19 access to more options to impact the customer
20 experience.

21 So back to your earlier comments, I
22 appreciate the comments. I think they are
23 consistent with our efforts in customer experience
24 and what we're trying to do in the customer realm,
25 and I think you'll continue to see us to use the

1 investments to leverage those to move us to the
2 next level with customer engagement, involvement in
3 how they manage their usage and their bills. No
4 doubt about it.

5 CHAIRMAN HALL: So let me go back to
6 my prior question. Would the company oppose or
7 have concerns about the Commission ordering that
8 that study be submitted prior to an application for
9 a rate increase or the filing of a rate design
10 case?

11 MR. IVES: My question -- my question
12 I guess in that regard -- and I'll say generally
13 no. If the Commission --

14 CHAIRMAN HALL: Then you're good.

15 MR. IVES: If the Commission wants
16 dated information, we're always willing to give
17 that. I'm trying to figure out -- I'm trying to
18 figure out the benefit of that, because we're going
19 to have to do the study. If we put it in a case,
20 we're going to have to produce the results and the
21 details, and necessarily we're going to need to
22 work with all the parties and the stakeholders to
23 get to the point to put it in a direct filing.

24 CHAIRMAN HALL: I think the issue is
25 sometimes issues get lost in the middle of a big

1 rate case, and if you can tell, there are at least
2 a couple of Commissioners that are very, very
3 engaged on this particular issue and might like to
4 see it brought before us in a discrete filing.

5 COMMISSIONER RUPP: And to echo your
6 comments, if in the next rate case there's a
7 stipulation, black box stipulation and we're trying
8 to get details that -- you know, it makes it even
9 more difficult. So I'll echo the Commissioner.

10 MR. FISCHER: I would note, I think
11 the Stipulation -- Jim over here. I think the
12 Stipulation does require that we have 12 months of
13 load research data, which will take some time to
14 develop, and I'm not sure how quickly, even if we
15 want to file it early, whether it would be done
16 much before the next rate case or in a rate design
17 case.

18 CHAIRMAN HALL: I mean, what I
19 envision would be simple requirement that when it
20 is completed it is filed. All right.

21 MR. FISHER: And I also would just
22 suggest, the company is going to be wanting to work
23 with all the parties along the way.

24 CHAIRMAN HALL: All right. Let's
25 move on to another topic. The customer charge is

1 going to be, under the Stipulation, \$10.43; is that
2 correct?

3 MR. FISCHER: Yes, I believe so.

4 CHAIRMAN HALL: Which is a -- and
5 that is an increase for one of the districts or
6 both districts?

7 MR. IVES: Just for L&P, one
8 district.

9 CHAIRMAN HALL: Okay. Then turning
10 to the rate, the volumetric rate structure, it
11 looks to me like what is in the settlement for
12 residential is a flat structure in the summer and a
13 declining structure in the winter; is that correct?

14 MR. IVES: Yes.

15 CHAIRMAN HALL: I'm sorry. Who said
16 yes?

17 MR. IVES: I did.

18 MR. FISCHER: Mr. Ives was speaking
19 there.

20 CHAIRMAN HALL: Okay. What is the
21 rationale for either of those structures?

22 MR. IVES: I'm going to let Mr. Rush
23 come up.

24 MR. RUSH: The first -- with regard
25 to the residential rate, what we -- basically, we

1 have a flat charge in the summertime today, and
2 what we were trying to -- with the exception of the
3 MPS rates that have a small inversion. What we
4 tried to do is we tried to keep the 12 -- I think
5 it's 12.05 -- yeah, it's 12.05, to be the same as
6 the summer rate for the MPS area in the tail block
7 that they exist today, and so that they saw the
8 12.05 as the price.

9 So essentially our rates at Kansas
10 City Power & Light, our rates at L&P were all flat
11 rates, and we're trying to become some unity with
12 that. So that's the purpose behind that.

13 CHAIRMAN HALL: So the purpose was
14 consistency?

15 MR. RUSH: That's correct, and also
16 impact to the customers. The purpose for the
17 declining block rate in the wintertime was very
18 driven by trying to be impact on the customer and
19 yet bringing the two categories together. So that
20 was driven by that, as well as what the cost
21 drivers are for those areas.

22 COMMISSIONER KENNEY: The customers,
23 is that because electric heat, usually don't lower
24 income people use more electric heat, space
25 heaters?

1 MR. RUSH: You'll find that from --
2 as far as if you're dealing with low income, we do
3 find that low-income customers, and we presented it
4 in another case -- they do -- they're pretty much
5 similar to the general population, but they do use
6 a little bit more electricity. But if you look at
7 their profile, they are a little higher, but their
8 usage profile is pretty much the same, too. It's
9 just shifted a little bit.

10 Anyway, it was -- most of the
11 residential rate design is all focused on impact to
12 the customer. We're trying to not make a big
13 impact in this stage of the game, if you look at
14 what we've agreed to or all the studies that would
15 be addressed further, the cost of service study,
16 the rate design study that we're agreeing to and
17 all the rate studies behind that.

18 CHAIRMAN HALL: Well, clearly there's
19 nothing in that rate structure that promotes
20 conservation? I guess I could look at the Division
21 of Energy or Renew Missouri for thoughts on that.

22 MR. ANTAL: I would -- I would add,
23 we supported -- this is essentially Staff's filed
24 rate design, is what parties are agreeing to. We
25 endorsed it in our rebuttal testimony. We've said

1 in the past couple cases that we support inclining
2 block rates, but we think that there should be a
3 move to them gradually.

4 This rate design, from my
5 understanding, flattens the differential between
6 the declining blocks so that there's, let's say,
7 less of the disincentive to use more.

8 CHAIRMAN HALL: So from your
9 perspective, this is a movement in the right
10 direction?

11 MR. ANTAL: Yes, it is.

12 MR. LINHARES: For Renew Missouri, I
13 would echo that sentiment. Although we're not a
14 signatory here, we do consider this a movement in
15 the right direction, and we just hope that
16 consideration of inclining block rates will
17 continue to be a major issue in ongoing rate cases.

18 CHAIRMAN HALL: From my perspective,
19 I am a strong proponent of inclining block rates,
20 and I look forward to the results of further
21 analysis by the company after its implementation of
22 the AMI to see whether or not inclining block rates
23 going forward make sense. Philosophically, for the
24 purposes of conservation, I'm a strong proponent.

25 MR. RUSH: The only thing I always

1 just be concerned about is conservation, somebody
2 has to be capable, able to do that, what actions
3 they can take. Some people don't have the ability
4 to take those certain actions.

5 CHAIRMAN HALL: I understand that.

6 But by having declining block rates, you are
7 incentivizing additional consumption.

8 MR. RUSH: I understand.

9 COMMISSIONER STOLL: Mr. Chairman?
10 Would somebody speak to that fact? Is a seasonal
11 block rates a declining block rate? Office of
12 Public Counsel?

13 DR. MARKE: You mean as it's set up
14 right now it is. To Mr. Rush's point earlier about
15 residential usage by income, I'd offer up that if
16 the Commission's interested, that the company's
17 potential study has saturation data on based off of
18 income and usage. So we can provide that
19 information, too, if you'd like, as well as all the
20 information on the rate design questions that were
21 asked earlier.

22 COMMISSIONER STOLL: And along with
23 that, the Division of Energy -- the Division of
24 Energy believes that having the seasonal rate has,
25 I guess I'll say does incentivize people a little

1 more to conserve, or how did you state that?

2 MR. ANTAL: We didn't take a position
3 on whether or not there should be seasonal rates
4 per se, if I'm understanding the question
5 correctly. I know Staff has proposed in its
6 testimony that the -- that the utility look at
7 redesigning its seasonal rates from just being a
8 winter/summer rate to having, let's say, shoulder
9 month rates. We didn't take a position on that, if
10 that is what your question is.

11 MR. RUSH: The summer rate is
12 definitely higher priced, where really it is the
13 incentive for a customer to use less in the
14 summertime. And that's where the major cost
15 drivers are for the company is having to have that
16 capability of meeting those loads at that time.

17 COMMISSIONER STOLL: Okay. Thank
18 you.

19 CHAIRMAN HALL: Let me turn to
20 page 14 of the Stipulation, of the second
21 Stipulation. Its title is Miscellaneous Tariff
22 Issues, and I want to -- I want to get some
23 clarification on the line facilities extension
24 tariff. It would appear that that particular
25 tariff, the current tariff will stay in place per

1 the Stipulation?

2 MR. RUSH: That is correct.

3 CHAIRMAN HALL: The company -- that
4 was not the company's position, right? The company
5 wanted to change that to be consistent with KCP&L's
6 tariff?

7 MR. RUSH: It did.

8 CHAIRMAN HALL: And Staff wanted GMO
9 to keep that particular tariff as it was?

10 MR. RUSH: That is correct.

11 CHAIRMAN HALL: I was wondering,
12 could Staff explain -- and I believe this would be
13 Ms. Kliethermes -- explain the rationale for that?

14 (Witness sworn.)

15 JUDGE JORDAN: Thank you. Please
16 state your name for the record, and you might want
17 to spell it for the court reporter also.

18 MS. KLIETHERMES: Sarah Kliethermes,
19 S-a-r-a-h, K-l-i-e-t-h-e-r-m-e-s.

20 Yes, Chairman, the current GMO design
21 for the facilities extension has a slightly more
22 complex calculation than the other utilities in the
23 state. It determines how much a customer who's
24 requesting a facility extension will pay based on
25 the relationship of what the facility costs versus

1 what additional revenue over their cost of energy
2 that that customer will contribute to the system.
3 What GMO was proposing to do would have softened
4 that.

5 CHAIRMAN HALL: What does soften
6 mean?

7 MS. KLIETHERMES: It would have, in
8 my opinion, increased the risk that existing
9 customers would be paying more than they should for
10 facilities that would cause their rates to go up
11 essentially.

12 CHAIRMAN HALL: So it's a cost of
13 service principle? Aren't you -- it would -- I
14 think what you're saying is that the GMO tariff
15 would require the customer seeking the line
16 facility extension to pay more of that cost based
17 upon the -- based upon its particular request.

18 MS. KLIETHERMES: In some cases. To
19 be clear, for many customers in most cases the
20 customer would contribute the same, which in most
21 cases would be nothing, under either tariff.

22 CHAIRMAN HALL: Give me an example
23 where the applicant would have to pay more.

24 MS. KLIETHERMES: If I were building
25 a -- if I were building a factory and I anticipated

1 that I would operate one week a year and that's it
2 and that week would -- well, that's a bad example.
3 Let's say that that factory would only be operating
4 on weekday afternoons when the cost of energy is
5 quite high.

6 The GMO example would say that you
7 are looking at, you know, I may be contributing a
8 thousand dollars a year in additional revenue, but
9 the cost of my energy is \$990, so, therefore, I'm
10 own contributing \$10. Versus the other formula
11 would -- again, this is a very much simplification
12 -- would just say you're contributing a thousand
13 dollars.

14 CHAIRMAN HALL: So it has nothing to
15 do with the existence of excess distribution
16 infrastructure?

17 MS. KLIETHERMES: Well, yes, but both
18 do.

19 CHAIRMAN HALL: But this change does
20 not -- is not contingent upon that in any way, the
21 difference between this tariff and the KCP&L
22 tariff?

23 MS. KLIETHERMES: There is, I think,
24 a recognition of that because whatever -- if I am
25 the customer causing -- in that example, if I am

1 right next to a distribution line that's not going
2 to need any enhancements, there's a chance that my
3 \$10 contribution would cover that. It's changing
4 the amount of customer dollars looked at. It
5 doesn't change the amount of what the cost to
6 expand the additional facilities would be. And I
7 would hope that GMO will correct me if I'm
8 butchering this.

9 MR. RUSH: The one thing I would
10 suggest is our only change that we were asking for
11 was dealing with residential customers in
12 subdivisions. We weren't really dealing with
13 commercial builders. We -- large manufacturing or
14 anything like that.

15 We were trying to make basically a
16 simplification of a process that we do this
17 incredibly detailed analysis to determine the
18 economics and what it cost us to provide a
19 residential customer. So you look at a subdivision
20 and they're all track homes of the same thing.
21 We were doing an individual -- we have to do an
22 individual study for each one of those homes, even
23 though it's the same -- going to have the same
24 results.

25 What we were trying to do is to

1 simplify that process, is all we were trying to do
2 with that. We still will do the detailed analysis
3 on all commercial and industrial customers, is what
4 our proposal was. What we are agreeing to is we
5 will continue to do that detailed analysis. I
6 understand there are concerns that the Commission
7 has that are addressing things.

8 We do have, you know, other elements
9 and other ways of looking at it, but this is --
10 that was what the process was for the line
11 extension was for us to simplify a process that we
12 go through. We agreed that we would continue on
13 with that detailed analysis.

14 CHAIRMAN HALL: Does Staff have a
15 response to that?

16 MS. KLIETHERMES: Frankly, I don't
17 have my tariffs in front of me. I did think that
18 there were C&I customers included in GMO's change
19 as well, but I will take Mr. Rush's word for it.

20 CHAIRMAN HALL: I have no further
21 questions.

22 COMMISSIONER KENNEY: Mr. Rush, on
23 that same -- and Ms. Kliethermes, please stay
24 there. Mr. Rush, explain the simplification for
25 residential subdivisions, new residential

1 subdivisions.

2 MR. RUSH: I think I'm going to let
3 Mr. Lutz speak to that because he actually worked
4 through the tariff with the folks involved.

5 COMMISSIONER KENNEY: Thank you.

6 MR. FISCHER: This is Brad Lutz.

7 (Witness sworn.)

8 COMMISSIONER KENNEY: Thank you.
9 Mr. Lutz, explain what changes you wanted to make.

10 MR. LUTZ: Absolutely. Basically
11 what we were trying to do was to utilize a revenue
12 basis for those calculations. Instead of using the
13 full construction alliance model that is currently
14 memorialized in the GMO tariffs, it would be a
15 simplified method where you just looked at the
16 revenue produced by that customer and used that as
17 your measure. So it would be a much more this
18 compared to that, as opposed to an algorithm that
19 would need to be calculated.

20 COMMISSIONER KENNEY: Okay. I'm just
21 interested because about -- several of our
22 utilities in the state do it completely different.
23 If I go put in a subdivision for Ameren Missouri,
24 Ameren Missouri provides the conduit. The
25 developer installs the conduit. Ameren runs the

1 wire. That's it. If I am with Laclede Gas,
2 Laclede Gas comes out, designs, installs their
3 pipe. If I am now with MGE as of their lat rate
4 case, MGE does the same exact thing.

5 If I'm with GMO, the developer -- the
6 developer pays for the pipe or I think developer --
7 does the developer pay for the pipe, too, first?

8 MR. LUTZ: Uh-huh.

9 COMMISSIONER KENNEY: Developer
10 installs the pipe. Developer cuts a check to GMO
11 for whatever the expense they guesstimate it's
12 going to be, and then the developer has to do a
13 convoluted way of getting those deposits back over
14 a five-year period based on there's a heat pump or
15 an air conditioner, heat pump works, whether
16 there's other electric appliances in the house. I
17 think it's about a thousand bucks a meter. But
18 they pay for it. They get their main line deposit
19 back.

20 What is Staff -- what would Staff
21 prefer to have, which of those systems, GMO's
22 system or Ameren's, Laclede, MGE's?

23 MS. KLIETHERMES: As I understand it,
24 none of the part that you just talked about would
25 actually change under GMO's proposal.

1 COMMISSIONER KENNEY: I know it
2 wouldn't change under GMO, but I want to compare
3 that to the other three utilities I just mentioned.

4 MS. KLIETHERMES: I personally can't
5 speak to what Staff's preference would be across
6 all utility types.

7 COMMISSIONER KENNEY: Can anybody
8 else speak to that, what Staff's preference is,
9 because Staff -- I mean, I just don't know why we
10 do it so -- is it because the company wants to do
11 it that way?

12 MS. KLIETHERMES: That I can say has
13 generally been the case, yes.

14 COMMISSIONER KENNEY: Because MGE did
15 it the way KCP&L does it until the last rate case
16 when they adopted the tariffs under their new --
17 they've had a new rate case since Laclede adopted
18 them, haven't they? Haven't they had a new rate
19 case since Laclede purchased MGE? Does anybody
20 know that?

21 MS. MAYFIELD: No.

22 COMMISSIONER KENNEY: They haven't?
23 Then how can they -- that's tariff. How can they
24 do it differently? Can anybody answer that
25 question? How can MGE change the way they did

1 their -- they do their line extensions? So is this
2 a tariff issue? I mean, the main line extension,
3 is that in a tariff issue?

4 MS. KLIETHERMES: Every company
5 across all utility types has their extension
6 policies tariffed, yes.

7 COMMISSIONER KENNEY: And MGE has not
8 had another rate case since they were acquired?

9 DR. MARKE: They'll be in this
10 spring.

11 COMMISSIONER KENNEY: Well, they've
12 changed their system. So I'm curious as to how
13 they can do that.

14 MS. KLIETHERMES: I'll bring this up
15 with folks who work on our gas cases.

16 COMMISSIONER KENNEY: I'm just
17 curious. Okay. That's all I have on that.

18 COMMISSIONER STOLL: I just have a
19 couple questions. We'll make another shift here.
20 A couple that I didn't get to before or that
21 haven't been answered. On the bottom of page 12,
22 it talks about the GMO surveillance reporting, and
23 there are two bullet points, and the bullet point
24 that I just wanted to ask a question about is on
25 the top of page 13, and it says, GMO will reflect

1 the per-book transmission expenses with adjustments
2 to this per-book amount to reflect the removal of
3 all MISO transmission expenses related to the
4 Crossroads Energy Center.

5 How does this compare to the current
6 tariff? Does that just reflect that or is that --

7 MR. FISCHER: I think, Commissioner,
8 we're talking about the surveillance reporting that
9 we provide to Staff and to the Commission on an
10 ongoing basis. That's where there's going to be an
11 adjustment so that the numbers reflect that there
12 aren't the transmission costs on that paragraph.

13 COMMISSIONER STOLL: Is it done that
14 way now when you present that or is this a change?

15 MR. FISCHER: This would be a change.

16 MR. RUSH: We currently provide the
17 total company's books and records on a surveillance
18 report, and what we're agreeing to here is to take
19 and exclude those MISO costs associated with
20 Crossroads out on the reporting basis.

21 COMMISSIONER STOLL: Okay. Thank
22 you. One other quick question. On the
23 Schedule A at the end of the Stipulation &
24 Agreement, I probably should know this, but how are
25 these depreciation rates determined? Do they come

1 from a manual or how -- is it common practice? Who
2 would like to answer that?

3 MR. FISCHER: Well, we've got a
4 depreciation study that Dr. -- that John Spanos
5 performed as a part of the record, and of course
6 the Staff reviews that.

7 COMMISSIONER STOLL: So it's done
8 through a depreciation study?

9 MR. RUSH: Yes. And we are required
10 to prepare and file a depreciation study on a
11 regular interval basis to address -- to address
12 that. If you have questions about that study, I
13 mean, Ron Clote is here that can answer anything if
14 you have questions.

15 COMMISSIONER STOLL: As I was going
16 through this, I was just kind of curious as to
17 why -- for example, if we're on page 3 of 3, 370.01
18 meters, load research meters are depreciated at
19 7.14 percent annually and then the AMI distribution
20 at 5 percent.

21 MR. RUSH: Right.

22 COMMISSIONER STOLL: Is that -- but
23 all that is determined through a study?

24 MR. RUSH: Exactly. They look at the
25 life expectancy. They look at the value in the

1 books. They look at the -- what's already been
2 depreciated. They go through an entire evaluation
3 in great detail of those elements.

4 COMMISSIONER STOLL: Okay. Thank you
5 for that information, and probably good you have
6 your depreciation expert here, even though he isn't
7 required to say anything right now.

8 MR. RUSH: If you'd like to ask him
9 questions, you're welcome to.

10 MR. FISCHER: The Commission's rules
11 require that they file periodically within so many
12 years, five years or close to the rate case.

13 COMMISSIONER STOLL: I probably
14 should have known that, but I thought I'd ask.
15 Thanks a lot. That's my only other question.

16 COMMISSIONER KENNEY: Probably more
17 clarification on a couple things, and I don't have
18 many. Dealing with the RESRAM on page 2, I know it
19 talks about the disallowance. In the last
20 sentence, This agreement does not address any
21 prospective solar rebates that may be paid by GMO
22 to customers after the date of the Stipulation.
23 Does that mean that those rebates may be part of a
24 future rate case?

25 MR. FISCHER: If there was ever

1 legislation that allowed additional rebates in the
2 future. This doesn't address that.

3 COMMISSIONER KENNEY: So that's just
4 making a clarification statement. Depends on what
5 happens. Okay. Let me see where I'm at. And then
6 on page -- on the hedging and cross hedging on
7 page 3, that last paragraph, it talks about the
8 signatories that GMO may resume, and it goes on
9 there. It seems a little vague. Does this mean
10 that if they do make the -- if GMO makes the
11 decision to do this, then -- and makes them -- you
12 get to make that decision, and that could be part
13 of a future rate case?

14 MR. RUSH: It could be part of a
15 future rate case. We have to come down and talk to
16 the folks both at the Office of the Public Counsel
17 and the Staff about our plan.

18 COMMISSIONER KENNEY: It says you
19 have to notify them.

20 MR. RUSH: Right. About our plan or
21 what we're going to do. We have a risk policy
22 corporately that we would -- that we control that
23 make decisions about whether we're willing to
24 address that.

25 COMMISSIONER KENNEY: So I guess you

1 guys agreed to get rid of it, but if you feel that
2 it's time to do it again, you're going to make --
3 you're going to tell the Staff why and OPC and
4 then --

5 MR. RUSH: That is correct.

6 COMMISSIONER KENNEY: Does that
7 interfere with your ability to make that decision
8 at that time? If you decide to do it, you can tell
9 them, but you get to do it, right? You're in
10 charge of your company. You make that decision.

11 MR. RUSH: That's how we would look
12 at it.

13 MR. FISCHER: It's my understanding
14 is it's the company's decision and they just want
15 to be informed about it.

16 COMMISSIONER KENNEY: Let me see. I
17 think you took care of most of that. Is there
18 anything in here for electrical vehicle charging
19 stations, any funding for that?

20 MR. WILLIAMS: Nothing explicit.

21 COMMISSIONER KENNEY: Pardon me?

22 MR. WILLIAMS: There's nothing
23 explicit.

24 COMMISSIONER KENNEY: Okay. How are
25 those working out? How much use do you get from

1 them? I just got in the habit of taking pictures
2 because I drive by a bunch of them all the time,
3 and I've only seen one -- one time I took a picture
4 and there was actually a car there. You've got a
5 great spot. You've got six great spots in the
6 Kansas City parking garage at City Hall in Kansas
7 City, and I walked up there one time and two cars
8 in there. I got real close and they're both
9 gasoline.

10 MR. IVES: It's working out real well
11 for us right now. We are not yet fully deployed
12 across our footprint, but we have probably 750 or
13 close to 800 of our stations installed right now.
14 We had a presentation in Kansas a couple months
15 ago. Our car ownership in the city has increased
16 about 4-, 450 percent since we started the program.
17 Utilization of our stations has increased in that
18 4-, 450, 500 percent since.

19 COMMISSIONER KENNEY: What's the
20 usage? Do you guys get much usage, though? Are
21 they using many of them?

22 MR. IVES: They are. It's up kind of
23 on the same clip as car -- as car ownership has
24 come up. We've moved to -- we've moved to be kind
25 of in the top four metropolitan areas in the

1 country now both on rate of car adoption and rate
2 of usage of stations. So it's early. You know,
3 we're still installing. They haven't been in for a
4 long time, but the trends --

5 COMMISSIONER KENNEY: A lot of people
6 don't know where they are.

7 MR. IVES: The trends have gone.
8 People are going -- we have great spots. You're
9 right. We've got stuff at sports stadiums, at
10 libraries, at City Hall. We've had a lot of good
11 hosts.

12 COMMISSIONER KENNEY: My daughter
13 ordered one of those Teslas. When she comes back
14 from Nashville, she's got lots of places.

15 MR. IVES: Got some places.

16 COMMISSIONER KENNEY: I think that's
17 all I have. Thank you very much.

18 COMMISSIONER RUPP: Can I follow up
19 on the vehicle charging? I remember talking about
20 this, and I can't -- help me here. So I pull into
21 your vehicle charging station. Walk me through the
22 process. Who gets billed? How does it get billed?
23 Do I pay? Just walk me through that.

24 MR. IVES: Sure. So today -- when we
25 started this program we set it up with hosts, host

1 places, good spots where we can get high traffic
2 area. They -- our hosts agreed to give us the
3 space to put the infrastructure in without cost,
4 and our hosts agreed to fund the electricity that
5 is being utilized on those charging stations for
6 the first two years of the installation of the
7 system.

8 We also had some funds available from
9 the Nissan group that's helping defray some of the
10 costs of Level 3 charging stations and ultimately
11 some of the Level 2s as well. So we had a couple
12 different places.

13 So if you're a driver, you pull in
14 today, you plug in, you charge, you drive away. No
15 cost to you because the hosts are picking it up.
16 The hosts are paying us for the electricity that
17 comes through that charging station at this point.

18 Post this two-year commitment, we
19 have a need to come up with the next phase of the
20 plan. We've had the workshop here, the discussion
21 here in Missouri. We've had dialog in Kansas, and
22 we have a request as part of our KCPL Missouri case
23 that's pending on how to move forward in that
24 regard.

25 But that will be the next phase is,

1 once that two-year commitment's up, how do we get
2 that electricity paid for by the customers that are
3 using the stations.

4 COMMISSIONER RUPP: When does the
5 two-year clock end?

6 MR. IVES: So the hosts have all
7 joined at different times. Generally the first
8 ones start to roll off at the end of this calendar
9 year.

10 COMMISSIONER RUPP: Thank you.

11 COMMISSIONER COLEMAN: I had a
12 question. Thank you. First, I'd like to commend
13 all the parties for the ERPP. And if you go to
14 page 5, I've got a question, please. And this is
15 relative to the weatherization, just a
16 clarification. Did I -- do I understand this
17 correctly? It says here -- let me make sure I find
18 my section again. All right. So the applicants
19 will agree to pay for weatherization assistance if
20 eligible and any other available energy assistance
21 programs.

22 How do you provide customers with
23 this information, and is this a requirement for the
24 weatherization assistance that they apply for funds
25 through other agencies? Is there a restriction if

1 they can't get those funds also?

2 MR. FISCHER: This would just be a
3 tariff provision where the applicants themselves
4 would agree to apply for weatherization or other
5 energy assistance. The company's agreeing in the
6 next sentence to work with the agencies to
7 encourage customers to do that. It wouldn't be
8 policing that or in any way requiring a customer
9 that did not do that.

10 COMMISSIONER COLEMAN: It's that
11 encouraging customers which is a bit vague to me.
12 So I wanted to know, you know, you say encourage,
13 but is there a penalty if -- do you foresee a
14 penalty if they are not contacting other agencies?

15 MR. FISCHER: There wouldn't be any
16 kind of penalty in the tariff. The company has no
17 other intent of penalizing people. But that
18 would -- that was asked -- we were asked to include
19 that in the tariff, and they do want to encourage
20 people to do that.

21 COMMISSIONER COLEMAN: Okay. And one
22 other thing regarding the meter opt out,
23 Section 10. My question is -- okay. So how do you
24 envision this working? You say they have an
25 opportunity to opt out. I suspect they will be

1 provided with information according to this that
2 there's a recurring charge of \$45 a month if a
3 person doesn't -- if a person does opt out. Am I
4 understanding that correctly, that that's a part of
5 their bill?

6 MR. FISCHER: Yes.

7 COMMISSIONER COLEMAN: Okay.

8 MR. FISCHER: That's designed to
9 cover the ongoing expenses of sending out a meter
10 reader, which we would not otherwise have to do.
11 Some folks don't like to have AMI meters on their
12 premises for a number of reasons, and this gives
13 them an option not to have that kind of facility,
14 but that will mean that we're going to incur
15 additional costs to send out a meter reader, and
16 that's what these costs are designed to do so that
17 other customers don't have to pay for those costs.

18 COMMISSIONER COLEMAN: And there is
19 an initial setup charge of \$150. Is that per
20 customer also?

21 MR. FISHER: Yes.

22 COMMISSIONER COLEMAN: \$150 plus \$45
23 a month for the meter reader?

24 MR. FISCHER: Yes.

25 COMMISSIONER COLEMAN: All right. So

1 how many meter readers do you estimate will be
2 unemployed as a result of going to the advanced
3 meters?

4 MR. IVES: I don't know the exact
5 number. I know most -- most of the movement in our
6 meter readers has already occurred. We -- we
7 talked about earlier, we have rolled out the meters
8 to the metro part of the GMO service territory. So
9 we have plans to do it out in the further service
10 areas, but we're going to wait and do that until we
11 get our new CCMB system installed so that we don't
12 interrupt that work.

13 But most of the move of our meter
14 readers has already occurred. It's happened
15 through either natural attrition or, because we've
16 been talking with the meter readers, they've
17 applied for other jobs that have opened up inside
18 the company.

19 As that's happened, they actually
20 move quicker than -- we still needed meter readers,
21 and people were moving to take other jobs, so in
22 that case we supplemented with temporary, you know,
23 consultant or third-party meter readers to help us
24 get through this transition.

25 COMMISSIONER COLEMAN: Thank you.

1 MR. ANTAL: Commissioner Coleman, I

2 have --

3 COMMISSIONER COLEMAN: Who's that?

4 MR. ANTAL: This is Alex from the

5 Division of Energy.

6 COMMISSIONER COLEMAN: We can't see
7 you up here. We hear a voice, but -- don't think
8 it's God, but we cant' find the face.

9 MR. ANTAL: Well, I'm flattered. If
10 I could go back to the economic relief program just
11 for a second. The current economic relief tariff
12 does require applicants to also apply for LIHEAP
13 funds. So they're already currently being sent to
14 the community action agencies to be screened for
15 LIHEAP eligibility, and then if they're not
16 eligible for LIHEAP, they're still qualified to
17 receive the economic relief pilot funds.

18 So from our perspective, that this
19 was a commonsense addition to that existing program
20 that they're already giving sent to the community
21 action agencies for LIHEAP screening. They should
22 also be being screened for weatherization at the
23 same time while they're already going there.

24 And there's no -- there's no --
25 there's no intent that they would not be eligible

1 for the funds from the economic relief program if
2 they weren't eligible for weatherization. It's
3 just we want to make sure that everybody's getting
4 the biggest bang for their buck, getting all of the
5 things that they're eligible for.

6 COMMISSIONER COLEMAN: Thank you.

7 JUDGE JORDAN: Chairman Hall.

8 CHAIRMAN HALL: One more line of
9 inquiry, and I apologize for doing this out of
10 turn. I understand what the Stipulation does
11 concerning transmission costs related to Crossroads
12 as it relates to the FAC. What I don't understand
13 is, what does the Stipulation do concerning
14 transmission costs from Crossroads in GMO's revenue
15 requirement?

16 MR. IVES: I would say from the
17 company's perspective, and I hope all parties'
18 perspective, that there's not been a specific
19 number set for transmission costs in the revenue
20 requirement because of the black box nature of it.
21 We may all see differently how much transmission
22 costs related to Crossroads is in there.

23 For purposes of ongoing surveillance
24 reporting, we did agree to present the surveillance
25 reports to the parties with excluding the MISO

1 related costs that are a result of Crossroads for
2 reporting purposes.

3 CHAIRMAN HALL: And then looking at
4 page 13 of the Stipulation, the FAC is going to be
5 consistent with the FAC put in place in the KCP&L
6 case with two exceptions, and I've got a question
7 about the first one. The percentage of SPP
8 transition costs included will be consistent with
9 the 39.62 percent Staff calculated. How does that
10 compare to KCPL's FAC?

11 MS. MANTLE: This is Lena Mantle with
12 Office of the Public Counsel.

13 (Witness sworn.)

14 MS. MANTLE: I believe that KCP&L's
15 is about 7.5 percent. The large difference has to
16 do with the fact that GMO purchased much of the
17 energy for its customers' need from the spot market
18 in the SPP integrated marketplace. That number is
19 calculated as the total energy purchased to meet
20 the customers' need divided by the total of the
21 customers' need.

22 So this is saying that almost
23 40 percent of the energy needed by GMO's customers
24 comes from purchased power. That's not just the
25 spot market. There's also at least two wind farm

1 purchased power agreements whose kilowatt hours are
2 included in that number.

3 CHAIRMAN HALL: So are the SPP
4 transmission costs per kilowatt hour or are they
5 set fees?

6 MS. MANTLE: You'd have to --

7 CHAIRMAN HALL: Because if they're
8 per kilowatt hour, why -- why would there be such a
9 significant discrepancy?

10 MS. MANTLE: Why is there such a
11 discrepancy in the percentage amounts?

12 CHAIRMAN HALL: Correct.

13 MS. MANTLE: That has to do with, if
14 purchased power is defined as the amount of power
15 purchased over what is generated to meet the
16 customers' need. There's two or three definitions
17 of purchased power floating out there. This is --
18 the definition that's used to come up with this
19 percentage is the amount purchased over what is
20 generated to meet customers' need. Does that get
21 to your question?

22 CHAIRMAN HALL: I think so.

23 MR. HACK: The calculation is the
24 same for both KCPL and GMO, but the results of the
25 calculation are different because GMO purchases

1 more power than KCP&L.

2 CHAIRMAN HALL: All right. And then
3 hopefully lastly, why was the company attempting to
4 include hedging costs for gas in the FAC?

5 MR. IVES: So we have historically
6 hedged with natural gas, both the gas used for our
7 systems and we have utilized for purchased power
8 natural gas as a cross hedge. And for a number of
9 years those hedges have rolled through the FAC
10 because they are a hedge for either the purchased
11 power or the gas that's being procured to generate.

12 What the position was in this case
13 was to go ahead and suspend the hedging and utilize
14 the FAC as the hedge for volatility and purchased
15 power or gas prices going forward and not do
16 separate hedges.

17 CHAIRMAN HALL: So the company's
18 willingness to forego hedging costs in the FAC, is
19 that somewhat a function of or completely a
20 function of the reduced volatility in the markets
21 for natural gas?

22 MR. IVES: I would say it's a
23 response to the views and the positions of other
24 parties around hedging moving forward.

25 CHAIRMAN HALL: So had nothing to do

1 with the volatility of natural gas or the lack
2 thereof?

3 MR. IVES: No. I think we've been
4 having this discussion for a period of time with
5 the parties, and I think parties have expressed
6 views that the FAC mechanism itself is a hedge to
7 expose the movements in commodity prices.

8 CHAIRMAN HALL: If the company --

9 MR. IVES: We wanted to retain -- I'm
10 sorry. We wanted to retain the ability to initiate
11 hedging again, natural gas hedging at least for the
12 natural gas side to the extent we felt like it was
13 the right thing to do to have that management
14 discretion, which is what we talked about earlier
15 with Commissioner Kenney.

16 The accounting for that we agreed to
17 handle a little bit differently on a prospective
18 basis using deferral versus flowing it through the
19 FAC, and that was really continuing response to
20 parties' positions.

21 CHAIRMAN HALL: Thank you.

22 MR. FISCHER: Mr. Chairman, I might
23 mention, too, there is -- if you're interested in
24 that topic, we had a case with the Staff three or
25 four years ago that dealt directly with that

1 program, the hedging and the cross hedging, and the
2 Commission has an order on it. But we're agreeing
3 to go along with this proposal.

4 CHAIRMAN HALL: All right. Thank
5 you.

6 JUDGE JORDAN: Further questions? I
7 have just one question. And it's probably very
8 elementary, but I want to inquire for my own
9 comfort, and it has to do with the Nonunanimous
10 Stipulation & Agreement regarding the pensions. I
11 note that the Stipulation phrases the quantities
12 involved in terms of Federal Accounting Standards
13 and Generally Accepted Accounting Principles. How
14 does that relate to the Commission's regulations
15 which -- and federal law which requires the use of
16 Uniform System of Accounting for electric
17 companies?

18 MR. FISCHER: I'm not sure I totally
19 understand your question. We use the Uniform
20 System of Accounting for purposes of all of our
21 accounting, and the FAS have the federal -- the FAS
22 also has particular regulations that apply to
23 specific topics within the accounting system, and
24 they're not mutually exclusive in any way. I've
25 got an accountant sitting here, though.

1 MR. IVES: Yeah. I think said
2 another way, the pension stipulation and settlement
3 is very consistent with prior settlements that
4 we've had in place and with settlements that -- or
5 with agreements that other utilities in the state
6 have, consistent with the US of A, consistent with
7 the FAS accounting treatment. So it's really just
8 talking about how we deal with making sure that
9 amounts that are recovered from customers
10 appropriately get funded into the pensions and the
11 benefits, but not inconsistent in any way with the
12 US of A.

13 JUDGE JORDAN: So it sounds like when
14 we're using Uniform System of Accounts, that system
15 incorporates or refers to FAS or GAAP for certain
16 purposes. Would that be a fair characterization?

17 MR. IVES: I think the way I would
18 say it is they really work in tandem. You apply
19 the US GAAP standards, but the US of A supports
20 that in the chart of accounts and the way it does
21 and in some cases makes a little bit -- you know,
22 it applies it differently because of the deferral
23 accounting that's specific to utilities. We have
24 the FAS treatment for that. There's also a
25 treatment that shows up in the US of A for that.

1 But they're not inconsistent.

2 JUDGE JORDAN: Okay. That sounds
3 like a yes.

4 MR. FISCHER: And I would just say,
5 Judge, this is very similar to a number of pension
6 stipulations that have been filed over the years
7 with GMO again, Kansas City Power & Light.

8 JUDGE JORDAN: What I'm really
9 getting to is whether this constitutes a request
10 for a variance from the Commission's regulations or
11 not. It sounds like no.

12 MR. FISCHER: No. No.

13 MR. IVES: It does not.

14 JUDGE JORDAN: That's all I have for
15 you. Thank you.

16 Well, there being no more questions,
17 is there any matter that anyone else needs to take
18 up before we go off the record?

19 MR. FISCHER: Judge, one thing that
20 you brought to our attention, that the
21 Stipulation & Agreement on page 1 might be amended
22 to include a -- on the third line down under total
23 revenue requirement, Section 11(4) and subsection
24 5 --

25 MR. STEINER: We did that earlier,

1 Jim.

2 MR. FISCHER: Did we get that done?

3 Okay. That's the only thing I had.

4 MR. WILLIAMS: Actually, I was
5 anticipating a query from the Commission about the
6 reference to current revenues on the first page.
7 You can find those on page 8 in that table where it
8 shows adjusted revenue at the bottom of that
9 column. That's just for clarification.

10 JUDGE JORDAN: Thank you, counselor.
11 Anything else before we go off the record? Thank
12 you, everyone, and thank you for your explanations
13 and having witnesses available.

14 MR. FISCHER: And thank you for your
15 interest today.

16 JUDGE JORDAN: And with that, we will
17 adjourn this on-the-record presentation and we are
18 off the record.

19 (WHEREUPON, the on-the-record
20 presentation concluded at 12:50 p.m.)

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C E R T I F I C A T E

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

I, Kellene K. Feddersen, Certified Shorthand Reporter with the firm of Midwest Litigation Services, do hereby certify that I was personally present at the proceedings had in the above-entitled cause at the time and place set forth in the caption sheet thereof; that I then and there took down in Stenotype the proceedings had; and that the foregoing is a full, true and correct transcript of such Stenotype notes so made at such time and place.

Given at my office in the City of Jefferson, County of Cole, State of Missouri.

Kellene K. Feddersen, RPR, CSR, CCR

A				
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