

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

In the Matter of Kansas City Power & Light )  
Company's Request for Authority to ) Case No. ER-2016-0285  
Implement a General Rate Increase for )  
Electric Service )

**PUBLIC COUNSEL'S RESPONSE AND PARTIAL  
OBJECTION TO KCPL EXHIBIT 169 AND 169 HC**

COMES NOW the Office of the Public Counsel ("OPC" or "Public Counsel") and for its *Response and Partial Objection to KCPL Exhibit 169 and 169 HC* offers the following comments:

Background

1. During the evidentiary hearing Chairman Hall asked for certain information regarding the electric vehicle charging station network including station cost, distribution cost, and depreciation levels. *See* Tr. Vol. 13, pp 1754-56. To facilitate the provision of this information certain exhibit numbers were reserved. Importantly, the Chairman asked whether there would be "a process by which the other parties would be able to look at those numbers and disagree or verify them." Tr. Vol. 13, p. 1755.
2. On March 7<sup>th</sup>, KCPL filed Exhibit 169 and 169 HC ("Exhibit 169") in the Commission's electronic filing system. Doc. No. 455. The same day, counsel for MECG sent data requests to the company seeking more information on the exhibit. Public Counsel requested copies of the company's response. On March 8<sup>th</sup>, Public Counsel requested workpapers related to the Exhibit 169.
3. The Company provided responses to the data requests on March 15<sup>th</sup>. Further, the same day, KCPL provided an excel document in response to Public Counsel's request for workpapers.

4. On March 15<sup>th</sup>, after reviewing the excel document provided by the company, Public Counsel sent additional data requests to KCPL. Public Counsel does not expect to receive responses to its data requests before the deadline for objecting to Exhibit 169.

#### Response

5. Based on the information received by Public Counsel at this time, it is unable to independently verify the values contained in KCPL Exhibit 169 but has no reason to disagree with the numbers provided.

6. First, KCPL Exhibit 169 indicates the number of charging stations specific to KCPL's Missouri operations. Then the exhibit contains a table with three broad categories listing a total dollar value for each category. Those categories are "Charging Stations", "Installation/materials", and "Meter Pedestal". The sum total of the three categories is \$4,978,178. Public Counsel notes that the exhibit does not include a detailed breakdown of the costs or items contained in each category; however Public Counsel understands that these items would all be categorized as the cost of the charging station if included in rate base.

7. The exhibit also contains the amount that KCPL believes represents distribution plant of the utility. KCPL Exhibit 169 states that KCPL applied a 10% depreciation rate for the charging stations and associated installations and materials but not the distribution plant. Based on the information available, Public Counsel is unable to discern how KCPL is defining distribution plant or how it is separated from the cost of a charging station and so Public Counsel cannot state whether it agrees or disagrees with the company's assertions.

#### Partial Objection

8. Public Counsel recognizes that KCPL Exhibit 169 was created in response to the Commission's request for information on the costs of the charging stations, distribution, and

depreciation. As explained above, Public Counsel has been unable to independently verify the values contained in KCPL Exhibit 169 but has no reason to disagree with the numbers provided therein. Public Counsel does not object to the portions of Exhibit 169 relating to the number of charging stations, the table containing the values for each of KCPL's categories, the assertion of the value associated with distribution, or the depreciation rate applied.

9. However, Public Counsel OBJECTS to the portion of Exhibit 169 that relates to KCPL's argument regarding the "service provider plan" selected by the company. Specifically, Public Counsel objects to the portion of the exhibit from the third indented paragraph (beginning with the words "The Service Provider Plan") through and including the fifth indented paragraph (beginning with the words "With the Service Provider Plan").

10. The portion of the exhibit regarding the "service provider plan" is improper because it is not information requested by the Commission but is unsolicited argument attempting to justify the company's decision to purchase a plan that is "substantially above" the incremental prices of other plans. The argument by KCPL is not relevant to the Commission's request and because the argument is offered in a special late-filed exhibit thus diminishing parties' ability to respond it should be excluded from the record.

WHEREFORE Public Counsel offers this *Response and Partial Objection to KCPL Exhibit 169 and 169 HC* and requests the Commission exclude the portion of KCPL Exhibit 169 and 169 HC described in paragraph 9 above from the record.

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

By: /s/ **Tim Opitz**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 17<sup>th</sup> day of March 2017:

/s/ Tim Opitz