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Service Commission

Exhibit No.:
Issues: Revenue Requirement
Witness: Seoung Joun Won, Ph.D.
Sponsoring Party: MO PSC Staff
Type of Exhibit: True-up Direct Testimony
Case No.: ER-2014-0370
Date Testimony Prepared: July 7, 2015

MISSOURI PUBLIC SERVICE COMMISSION

REGULATORY REVIEW DIVISION

TRUE-UP DIRECT TESTIMONY

OF

SEOUNG JOUN WON, Ph.D.

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2014-0370

*Jefferson City, Missouri
July 2015*

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

*Staff Exhibit No. 257-NP
Date 7/20/15 Reporter Jenni
File No. ER-2014-0370*

NP

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

In the Matter of Kansas City Power &)
Light Company's Request for Authority to)
Implement a General Rate Increase for)
Electric Service)

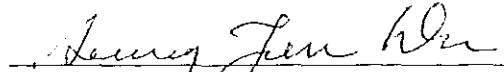
Case No. ER-2014-0370

AFFIDAVIT OF SEOUNG JOUN WON, Ph.D.

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

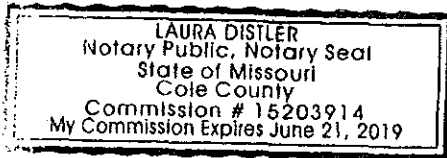
COMES NOW, Seoung Joun Won, Ph.D. and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached True-up Direct Testimony; and that the same is true and correct according to his best knowledge and belief.

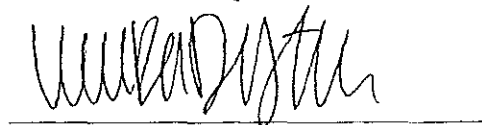
Further the Affiant sayeth not.



Seoung Joun Won, Ph.D

Subscribed and sworn to before me this 7th day of July, 2015.





Notary Public

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TRUE-UP DIRECT TESTIMONY

OF

SEOUNG JOUN WON, Ph.D.

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2014-0370

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TRUE-UP DIRECT TESTIMONY
OF
SEOUNG JOUN WON, Ph.D.
KANSAS CITY POWER & LIGHT COMPANY
CASE NO. ER-2014-0370

Q. Please state your name and business address.

A. Dr. Seoung Joun Won, 200 Madison Street, Governor Office Building,
Jefferson City, Missouri.

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

A. I am a Regulatory Economist III with the Missouri Public Service Commission
("Commission").

Q. Are you the same Dr. Seoung Joun Won who filed testimony as part of the
Staff's Cost of Service Report on April 3, 2015?

A. Yes, I am.

EXECUTIVE SUMMARY

Q. What is the purpose of your True-up Direct Testimony?

A. The purpose of this testimony is to provide the results of Staff's true-up
revenues for the Large Power Service ("LPS") class of Kansas City Power & Light Company
("KCPL"). The true-up period cut off is May 31, 2015.

Q. Which revenue adjustment are you sponsoring testimony on?

A. I am sponsoring the LPS annualization adjustment for customer changes
through May 31, 2015.

1 ANNUALIZATION OF CUSTOMER CHANGES

2 Q. Are there any known and measurable customer changes in the LPS class of
3 KCPL during the true-up period?

4 A. Yes. According to KCPL's response to Data Request No. 0585, there is a new
5 LPS customer who initiated service after the update period ending December 31, 2014, and
6 during the true-up period of May 31, 2015.

7 Q. When did KCPL start providing service to the new customer?

8 A. According to KCPL's response to Data Request No. 0585, the service for the
9 new customer started on February 28, 2015.

10 Q. Did Staff conduct a true-up revenue adjustment for the new customer?

11 A. Yes. Staff annualized the usage of the new customer and made the true-up
12 revenue adjustment for the customer change.

13 Q. Did Staff obtain from KCPL its estimate of the prospective usage of the new
14 customer?

15 A. Yes. In its response to Data Request No. 0585.1, KCPL provided its estimate
16 which matches Staff annualized usage of the new customer. KCPL's response is attached as
17 Schedule SJW-1.

18 Q. Are there any other known and measurable usage and revenue true-up changes
19 for the LPS class?

20 A. No.

21 Q. Please summarize your true-up direct testimony.

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

1 A. During the true-up period, there is a new customer who initiated service in the
2 LPS class. Staff accounted for this annualization by increasing usage and revenues by
3 approximately ** ____ ** million dollars.

4 Q. Does the approximately additional ** ____ ** million dollars in the LPS class
5 impact the Non-Unanimous Stipulation and Agreement on Certain Issues (“Agreement”)
6 concerning Class Cost-of-Service and Rate Design?

7 A. No. Staff continues to support the Agreement that the Commission should
8 allocate any increase to the revenue requirement resulting from this case as an equal
9 percentage increase to all classes.

10 Q. Does this conclude your true-up direct testimony?

11 A. Yes, it does.

NP

Schedule SJW-1

Is Deemed

Highly Confidential

In Its Entirety