BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Veolia Energy Kansas City) Inc.'s Adjustment to its PACC Tariff) File No. HT-2019-0224 Tracking No. YH-2019-0151

STAFF RECOMMENDATION TO APPROVE TARIFF SHEETS FILED TO REVISE THE PRODUCTION ADJUSTMENT COST CLAUSE

COMES NOW Staff of the Missouri Public Service Commission, by and through counsel, and submits its Recommendation to the Missouri Public Service Commission ("Commission") recommending that the Commission issue an order approving 5th Revised Tariff Sheet No. 36 and 5th Revised Tariff Sheet No. 37 as filed by Veolia Energy Kansas City, Inc. ("Veolia" or "Company") February 1, 2019 bearing an effective date of April 1, 2019. Staff states as the following:

1. On February 1, 2019, Veolia filed Tariff Sheet Nos. 36 and 37 to revise the Company's Production Adjustment Cost Clause ("PACC") rates for steam service.

2. On February 4, 2019, the Commission ordered Staff to file its recommendation regarding Veolia tariff sheets (Tracking No. YH-2019-0151) no later than March 4, 2019.

3. The Commission Staff's Tariff and Rate Design Department has reviewed the filed revised tariff sheets and recommends the Commission issue an order approving them as filed on February 1, 2019. See Staff's Memorandum attached hereto as Appendix A and incorporated herein.

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WHEREFORE, for the reasons explained fully in Staff's Memorandum,

Staff recommends the Commission issue an order approving the following tariff sheets as

filed by Veolia on February 1, 2019 bearing an effective date of April 1, 2019:

P.S.C. MO. No. 1

5th Revised Sheet No. 36, Cancelling 4th Revised Sheet No. 36 5th Revised Sheet No. 37, Cancelling 4th Revised Sheet No. 37

Respectfully submitted,

<u>/s/ Ron Irving</u>

Ron Irving Legal Counsel Missouri Bar No. 56147 Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751-8702 (Telephone) (573) 751-9285 (Fax) ron.irving@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically on this 4th day of March, 2019 to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

<u>/s/ Ron Irving</u>

<u>MEMORANDUM</u>

TO: Missouri Public Service Commission Official Case File Case No. HT-2019-0224, Tariff Tracking No. YH-2019-0151 Veolia Energy Kansas City, Inc.

FROM: Michael L. Stahlman, Regulatory Economist III

/s/ Robin Kliethermes 3/04/2019	/s/ Ron Irving	3/04/2019
Tariff / Rate Design Manager / Date	Staff Counsel Division / Date	

- SUBJECT: Staff Recommendation to Approve the Tariff Sheets Filed to Revise the Production Adjustment Cost Clause rates to go into effect on April 1, 2019.
- DATE: March 4, 2019

On February 1, 2019, Veolia Energy Kansas City, Inc. ("Veolia") filed with the Commission two (2) tariff sheets for steam service to implement the Production Adjustment Cost Clause ("PACC") for the twelve (12) months starting April 1, 2019 through March 31, 2020. The adjustment is required by Veolia's PACC, which the Commission approved in Case No. HR- 2014-0066, effective August 1, 2014.

Veolia's filing included the proposed tariff sheets and supporting work papers consisting of electronic worksheets showing Veolia's calculation of the PACC for inclusion in customers bills' beginning April 1, 2019 through March 31, 2020.

On February 4, 2019, the Commission directed Staff to file a recommendation on the pending tariff sheets no later than March 4, 2019.

The procedure for the calculation of the PACC for steam service sales is set out in Veolia's Tariff Sheets Nos. 31 through 37, which are titled "Production Adjustment Cost Clause." The PACC calculation components as described in Tariff Sheet Nos. 36 and 37 include the Current PACC and the Reconciliation Rate or "R factor" plus any applicable reconciling adjustments.

The PACC Rider for this 5th revision of Tariff Sheet No. 36 reflects a negative charge per million pounds ("mlb") of (\$0.40858), which is a decrease from the previous rate of (\$0.16412). This means that a customer would see an increase in their monthly PACC bill credit (i.e. a total bill decrease) of \$0.24 for every mlb of steam used as compared to the credit from the previous year. The PACC Rider negative charge is a reduction to customer bills to reflect the customer share of the variation in fuel cost for the calendar year that ended in 2018. The PACC Rider rate factor is designed to reflect each Customer's share of the variation in production costs for the 2018 accumulation period compared to the actual production costs in Case No. HR-2014-0066. The difference between actual production costs and the amount of production costs covered by base rates (both on a dollar basis) is multiplied by 95% and then divided by the total metered sales during the accumulation period to quantify the PACC adjustment factor. To determine the amount of an individual customer's responsibility, the PACC adjustment factor is multiplied by the actual steam sales to that individual customer during the accumulation period, with the resulting dollar amount charged or credited to the customer in twelve (12) equal installments.

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Currently there are no customer Reconciling Adjustments calculated in this PACC adjustment factor. In response to Staff Data Request 0001, Veolia has indicated that no reconciliation adjustments are necessary for this filing since there are no outstanding balances on the PACC adjustment accounts. Veolia does have an option for semi-annual rate adjustments to reflect 95% of the changes to production costs.

Staff reviewed the data and mathematical calculations Veolia provided in its worksheets and found Veolia's calculations related to the filed tariff sheets to be correct, and that the calculations satisfy the standards set forth in Veolia's Tariff Sheet Nos. 31 through 37. The calculations are also consistent with Veolia's PACC filing as contained in Case No. HR- 2014-0066.

Staff Recommendation

Staff has reviewed the filed tariff sheets and recommends approval of the following tariff sheets to go into effect for service on and after April 1, 2019, the requested effective date:

P.S.C. MO. No. 1 5th Revised Sheet No. 36 Cancelling 4th Revised Sheet No. 36

5th Revised Sheet No. 37 Cancelling 4th Revised Sheet No. 37

Staff has verified that Veolia is not delinquent on any assessment and has filed its Annual Report. Veolia is current on its submission of its Surveillance Monitoring reports as required in 4 CSR 240-20.090(10) and its monthly reports as required by 4 CSR 240-3.161(5). Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing. Staff's recommendation for approval of the PACC change in this case is solely based on the accuracy of Veolia's calculations.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Veolia Energy Kansas City, Inc.'s) Kansas City, Inc.'s Adjustments to its PACC Tariff)

Case No. HT-2019-0224 Tracking No. YH-2019-0151

AFFIDAVIT OF MICHAEL L. STAHLMAN

STATE OF MISSOURI)) ss COUNTY OF COLE

COMES NOW, Michael L. Stahlman, and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Staff Recommendation in memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

hla

Michael L. Stahlman

Subscribed and sworn to be this St day of March, 2019.

Diama L. Vaug V-Notary Public

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 28, 2019 Commission Number: 15207377 Commission Number: 15207377