

Exhibit No.:
Issue: Weather Normalization; Customer Annualization
of Unit Sales
Witness: Albert R. Bass, Jr.
Type of Exhibit: Direct Testimony
Sponsoring Party: KCP&L Greater Missouri Operations Company
Case No.: ER-2018-0146
Date Testimony Prepared: January 30, 2018

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2018-0146

DIRECT TESTIMONY

OF

ALBERT R. BASS, JR.

ON BEHALF OF

KCP&L GREATER MISSOURI OPERATIONS COMPANY

**Kansas City, Missouri
January 2018**

DIRECT TESTIMONY

OF

ALBERT R. BASS, JR.

Case No. ER-2018-0146

1 **Q: Please state your name and business address.**

2 A: My name is Albert R. Bass, Jr. My business address is 1200 Main, Kansas City,
3 Missouri 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Kansas City Power & Light Company (“KCP&L”) as Manager of
6 Energy Forecasting and Analytics.

7 **Q: On whose behalf are you testifying?**

8 A: I am testifying on behalf of KCP&L Greater Missouri Operations Company (“GMO” or
9 the “Company”).

10 **Q: What are your responsibilities?**

11 A: My responsibilities include supervising two employees with responsibility for short-term
12 electric load forecasting, long-term electric load forecasting, weather normalization, and
13 various other analytical tasks.

14 **Q: Please describe your education, experience and employment history.**

15 A: I received a Bachelor of Science in Business Administration degree with emphasis in
16 Marketing from Missouri Western State University in 1989. I earned a Master of
17 Business Administration degree from William Woods University in 1995.

18 Prior to joining KCP&L, I worked for APS Technologies developing product
19 forecast models and conducting market analysis. In June 1998, I joined KCP&L as a

1 Technical Professional. In this role, I conducted market analysis, developed market
2 options studies, and research. In May 2000, I assumed the responsibilities for short-term
3 budget forecasting, long-term load forecasting for the Integrated Resource Plan, monthly
4 kilowatt-hour (“kWh”) sales and peak weather normalization, and weather normalization
5 for rate case filings. As part of these duties, I assisted with the creation of the weather
6 normalization testimony filed by KCP&L. In July 2013, I was promoted to Manager of
7 Market Assessment. In March 2017, I was promoted to my current position as Sr.
8 Manager of Energy Forecasting and Analytics.

9 **Q: Have you previously testified in a proceeding before the Missouri Public Service**
10 **Commission (“Commission” or “MPSC”) or before any other utility regulatory**
11 **agency?**

12 A: Yes, I provided written testimony in KCP&L Greater Missouri Operation Company’s rate
13 case (ER-2016-0156) and KCP&L’s 2014 rate case (ER-2014-0370), KCP&L’s 2016 rate
14 case (ER-2016-0285) and KCP&L’s rate case before the Kansas Corporation
15 Commission (15-KCPE-116-RTS).

16 **Q: What is the purpose of your testimony?**

17 A: The purposes of my testimony is to sponsor Schedules ARB-1 through ARB-4, which
18 include weather normalization, customer growth, rate switching, and energy efficiency
19 adjustments of test year monthly kWh sales and peak loads. I recommend that the
20 Commission adopt these results in the current case.

1 **I. WEATHER NORMALIZATION, DECLINE IN AVERAGE USE**

2 **Q: What normalizations are you making to kWh sales and peak loads?**

3 A: Both monthly and hourly kWh sales are adjusted to reflect normal weather conditions.
4 This is called a weather adjustment. The kWh sales are further adjusted for customer
5 growth that occurs between the test year and the true-up date of June 2018, and for
6 customers who were switched from one rate to another during or after the test year.
7 These customers are known as rate switchers. An additional adjustment to the kWh sales
8 is made for energy efficiency that occurs between the test year and two months prior to
9 the true-up date of June 2018.

10 **Q: What is the purpose of making a weather adjustment?**

11 A: Abnormal weather can increase or decrease a utility company’s revenues, fuel costs and
12 rate of return. Therefore, revenues and expenses are typically adjusted to reflect normal
13 weather to determine a company’s future electric rates. These adjustments are made by
14 first adjusting kWh sales and hourly loads and then using these results to adjust test-year
15 revenues and incremental costs (*i.e.*, fuel and purchased power).

16 During the test year, July 2016 through June 2017, there were 24% less heating
17 degree days and 8.5% more cooling degree days than normal at the Kansas City
18 International Airport. Thus, heating load was significantly lower than normal while
19 cooling load was slightly above normal. This results in a net positive weather adjustment
20 to kWh sales.

21 **Q: What method was used to weather-normalize kWh sales?**

22 A: The method was based on load research (“LR”) data, which was derived by measuring
23 hourly loads for a sample of GMO’s customers representing the Residential, Small

1 General Service (“GS”), Large GS, and Large Power classes. The hourly loads were
2 grossed up by the ratio of the number of customers for each of these classes divided by
3 the number sampled.

4 In the first step, the hourly loads for the sample were calibrated to the annual
5 billed sales of all customers in each class. The ratio of the billed sales divided by the sum
6 of the hourly loads was multiplied by the load in each hour.

7 In the second step, the hourly loads were estimated for lighting tariffs and the
8 loads for all tariffs, including sales for resale, were grossed up for losses and compared to
9 Net System Input (“NSI”). The difference between this sum and the NSI then was
10 allocated back to the LR data in proportion to the hourly precisions that were estimated
11 for the load research data.

12 In the third step, regression analysis was used to model the hourly loads for each
13 rate class. These models included a piecewise linear temperature response function of a
14 two-day weighted mean temperature.

15 In the fourth step, this temperature response function was used to compute daily
16 weather adjustments as the difference between loads predicted with normal weather and
17 loads predicted with actual weather. Normal weather was derived using spreadsheets
18 provided by the MPSC Staff. The normal weather represents average weather conditions
19 over the 1981-2010 time period.

20 In the fifth step, the daily weather adjustments were split into hourly adjustments
21 and these were added to NSI to weather-normalize that series.

22 In the sixth step, the daily weather adjustments were split into billing months
23 based on the percentage of sales on each billing cycle and the meter reading schedule for

1 the test year period. These weather adjustments then are used to create a weather factor
2 for each class for each month, which are multiplied by billed kWh sales to weather-
3 normalize monthly class billed kWh sales. The Large Power (“LP”) tariff weather factor
4 is used to weather-normalize each individual customer within that class.

5 **Q: What adjustment did you make for rate switchers?**

6 A: Each year a small percentage of customers are switched from their current tariff to
7 another that is expected to reduce their electric bills. We adjusted kWh sales for the
8 Large Power tariff for customers that switched into or out of this tariff. There were
9 seventy-six LP customers who switched rates during the test year. The customer growth
10 adjustment accounted for rate switchers in the other tariffs.

11 **Q: What adjustment did you make for customer growth?**

12 A: For each month in the test year, the weather-normalized sales per customer were
13 multiplied by the number of customers projected for the true-up date June 2018. This
14 adjustment is made to weather-normalized sales to the Residential, Small GS, and Large
15 GS classes. When the numbers become available, I will revise this adjustment using the
16 actual number of customers as of the true-up date of June 2018.

17 **Q: What adjustment did you make for LP?**

18 Sales to LP customers are adjusted by plotting each customer’s monthly kWh sales and
19 looking for any changes in sales that appear to be or are known to be permanent resulting
20 in an annualization by account on an individual customer basis. If any such changes are
21 identified, sales during the test year are adjusted to reflect the change.

22 There were 253 customers in the LP class at the beginning of the test year. Eight
23 customers ended service, seventy-six customers left the LP class, four customers

1 switched rates within the LP class, twelve customers switched to LP class and four new
2 customers were added to the LP class. This results in 185 LP customers annualized for
3 the test period. Customers that moved in or out of the LP class with partial data during
4 the test year are annualized for the full test year. The adjustments for growth to LP sales
5 will be revised using the most current data for the true-up.

6 **Q: Were any other adjustments made besides the adjustment for rate switchers and**
7 **customer growth?**

8 A: Yes, an additional adjustment is made to annualize the impact of the Company's energy
9 efficiency programs on test year sales. During the test year, GMO invested significantly
10 on programs designed to help customers use energy more efficiently. The result of this
11 investment in energy efficiency programs is a decline in the sales made by the Company
12 relative to the level of sales that would be made absent the programs. Because the
13 Company programs generated customer savings during the test year and true up period,
14 the impact of those efficiency measures installed during the test year should be
15 annualized to reflect the full impact of the measures on the Company's sales.

16 **Q: Do installed efficiency measures in the test year affect the test year sales and why is**
17 **it necessary to further adjust sales to fully reflect the impact of the programs?**

18 A: Yes, if a residential customer who is not participating in any Company energy efficiency
19 programs has an annual average usage of 10,500 kWh and then decided to participate in
20 the Company programs with four months left in the test year, which now reduces their
21 actual test year usage to 10,000 kWh the Company would only see a reduction of 500
22 kWh in the test year. In this example on an annual basis going forward, however, the
23 customer's true annual average consumption is actually reduced by 1,500 kWh due to the

1 energy efficiency actions promoted by the Company. The reason is the change took
2 place during the test year, but the impacts of the installed measures are only reflected in
3 one-third of the test year load. The effect can be extreme when you start looking at all
4 customer participation rates and the fact that they sign up and participate in various
5 programs throughout the test year. Since the Company has documented participation
6 rates and measures installed in the test year, the annualized energy savings of those
7 measures, and the installation dates of the measures, it is appropriate to reflect the full
8 energy impact of the measures in the test year. This is a known and measurable change
9 in the energy consumption that occurred before the end of the test year, which will
10 continue going forward and should be annualized.

11 **Q: What are the adjustments to annualize the impact of Company’s energy efficiency**
12 **programs on test year’s sales?**

13 A: Upon filing a rate case, the cumulative, annualized, normalized kWh and kilowatt (“kW”)
14 savings will be included in the unit sales and sales revenues used in setting rates as of an
15 appropriate time (most likely two months prior to the true-up date) where actual results
16 are known prior to the true-up period, to reflect energy and demand savings in the billing
17 determinants and sales revenues used in setting the revenue requirements and tariffed
18 rates in the case.

19 **Q: Describe how you calculated the energy efficiency adjustment.**

20 A: The calculation of the energy efficiency adjustment is based on the stipulation in Case
21 No. EO-2015-0241¹:

¹ Non-Unanimous Stipulation and Agreement Resolving MEEIA Filings, Case No. EO-2015-0241, pp. 13-15.

1 In the first step, GMO will take test period weather normalized kWh usage for
2 each customer class by billing month and adjust it by² adding back the monthly kWh
3 energy savings by customer class incurred during the test period from all active Missouri
4 Energy Efficiency Investment Act (“MEEIA”) programs, excluding Home Energy
5 Reports and Income-Eligible Home Energy Reports programs which have a one year
6 measure life, determined using the same methodology as described in Tariff Sheet 138.4
7 and 138.5 (GMO) except that calendar month load shape percentages by program by
8 month will be converted to reflect billing month load shape percentages by program by
9 computing a weighted average of the current and succeeding month percentages.

10 In the second step, the adjusted test period sales from above will be annualized for
11 customers and additionally be adjusted further by subtracting the cumulative annual kWh
12 energy savings from the first month of the test period through the month ending where
13 actual results are available (most likely two months prior to the true-up date) by customer
14 class from all active MEEIA programs, excluding Home Energy Reports and Income-
15 Eligible Home Energy Reports, determined using the same methodology as described in
16 Tariff Sheet 138.4 and 138.5 (GMO) except that calendar month load shape percentages
17 by program by month are converted to reflect billing month load shape percentages by
18 program by computing a weighted average of the current and succeeding month
19 percentages.

² Step 1. Begin with Weather Normalized kWh per class provided by Company. Step 2. Compute Monthly Savings kWh (MS) per program in the same manner as used for TD calculation. Step 3. Weather Normalized kWh before application of Energy Efficiency (EE) adjustment. Step 4. Cumulative Annual Savings kWh (CAS) per program computed in the same manner as TD calculation as of Rebase Date. Step 5. Monthly Load Shape percentage per program converted to billing month equivalent by using a weighted average calendar month Load Shape percentage based on billing cycle information of the rate case. Step 6. Monthly EE Rebase Adjustment. Step 7. Weather Normalized kWh rebased for EE.

Non-Unanimous Stipulation and Agreement Resolving MEEIA Filings, Case No. EO-2015-0240, -0241, p. 13.

1 In the third step, the test period kW demand for each customer class will be
2 adjusted by³ adding back the monthly kW demand savings by customer class incurred
3 during the test period from all active MEEIA programs, excluding Home Energy Reports,
4 Income-Eligible Home Energy Reports and Demand Response Incentive programs,
5 determined using the same methodology as described for kWh savings in Tariff Sheet
6 138.4 and 138.5 (GMO) and then subtracting the cumulative annual kW demand savings
7 from the first month of the test period through the month ending where actual results are
8 available (most likely two months prior to the true-up date) by customer class from all
9 active MEEIA programs, excluding Home Energy Reports, Income-Eligible Home
10 Energy Reports and Demand Response Incentive programs, determined using the same
11 methodology as described for kWh savings in Tariff Sheet 138.4 and 138.5 (GMO).

12 In the fourth step, after the energy efficiency adjustment for kWh and kW has
13 been determined, weather normalized kWh and kW are rebased with the energy
14 efficiency adjustment. kWh sales are rebased by subtracting the energy efficiency
15 adjustment from the weather normalized kWh and kW (demand) is determined by taking
16 the monthly kWh and spreading it across an hourly load shape to determine the monthly
17 peak demand.

18 The impacts that are applied to the weather normalized and customer adjusted
19 kWhs used to rebase the weather normalized sales are shown in Schedule ARB-2.

³ Step 1. Begin with kW demand per class provided by Company. Step 2. Compute Monthly kW demand per program in the same manner as used for TD calculation. Step 3. kW demand before application of Energy Efficiency (EE) adjustment. Step 4. Cumulative Annual kW demand per program computed in the same manner as TD calculation as of Rebase Date. Step 5. Monthly Load Shape percentage per program converted to billing month equivalent by using a weighted average calendar month Load Shape percentage based on billing cycle information of the rate case. Step 6. Monthly EE Rebase Adjustment. Step 7. kW demand rebased for EE.

Non-Unanimous Stipulation and Agreement Resolving MEEIA Filings, Case No. EO-2015-0240, -0241, p. 13.

1 **Q: What are the results of these normalizations?**

2 A: Schedule ARB-1 shows the monthly adjustments for normalization on kWh sales.
3 Schedule ARB-2 shows the annualized kWh energy efficiency impact. Schedule ARB-3
4 shows weather-normalized customer annualized monthly peaks by class. Schedule ARB-
5 4 shows weather-normalized customer annualized loads by class at the time of the
6 monthly system peak load.

7 **Q: How are these results used?**

8 A: Weather-normalized, customer-annualized kWh sales are used to calculate test year
9 revenues and fuel costs.

10 **Q: Does that conclude your testimony?**

11 A: Yes, it does.

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

In the Matter of KCP&L Greater Missouri)
Operations Company's Request for Authority to) Case No. ER-2018-0146
Implement A General Rate Increase for Electric)
Service)

AFFIDAVIT OF ALBERT R. BASS, JR.

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Albert R. Bass, Jr., being first duly sworn on his oath, states:

1. My name is Albert R. Bass, Jr. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Sr. Manager-Energy and Forecasting.

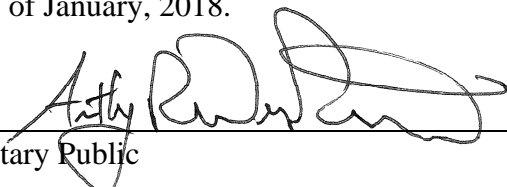
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of KCP&L Greater Missouri Operations Company consisting of ten (10) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.



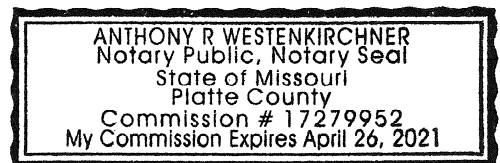
Albert R. Bass, Jr.

Subscribed and sworn before me this 29th day of January, 2018.



Notary Public

My commission expires: 4/26/2021



WEATHER ADJUSTMENTS TO MONTHLY BILLED SALES OF GMO

NORMALIZATIONS TO MONTHLY MWH SALES

		Weather Adjustments to Monthly Billed Sales												
Tariff		Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Test Year
GMO	Residential	35,007	-3,656	8,484	11,450	-9,304	-14,644	-4,952	-24,678	-25,654	-10,259	-1,738	3,976	-35,968
	Small GS	5,519	-279	2,674	2,836	-1,159	-3,076	-1,724	-6,815	-5,377	-2,087	-608	1,027	-9,070
	Large GS	6,507	-381	3,267	3,148	-1,945	-3,529	-1,920	-7,728	-6,788	-2,553	-530	1,232	-11,221
	Large Power	3,106	-659	2,226	2,316	978	-437	-1,433	-3,279	-1,152	145	-29	742	2,524
	Total	50,138	-4,975	16,651	19,749	-11,430	-21,686	-10,029	-42,500	-38,971	-14,754	-2,906	6,977	-53,735

ANNUALIZED ENERGY EFFICIENCY IMPACTS FOR GMO

ENERGY EFFICIENCY ADJUSTMENT TO MONTHLY MWH SALES

State Tariff	Energy Efficiency Adjustments to Monthly Billed Sales												Test Year
	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	
GMO Residential	-6,039	-6,234	-5,083	-3,917	-3,353	-3,376	-3,485	-3,119	-2,755	-2,568	-2,613	-2,844	-45,385
GMO Small GS	-3,698	-3,774	-3,585	-3,416	-3,328	-3,160	-3,112	-2,874	-2,532	-2,087	-1,832	-1,830	-35,227
GMO Large GS	-4,576	-4,674	-4,467	-4,287	-4,175	-3,977	-4,022	-3,822	-3,462	-2,867	-2,403	-2,346	-45,079
GMO Large Power	-3,003	-3,071	-2,976	-2,936	-2,903	-2,791	-2,860	-2,747	-2,659	-2,510	-2,347	-2,341	-33,142
Total	-17,315	-17,753	-16,110	-14,555	-13,759	-13,304	-13,480	-12,561	-11,408	-10,031	-9,195	-9,361	-158,833

WEATHER NORMALIZED MONTHLY PEAK LOADS (MW) for GMO

WEATHER NORMALIZED MONTHLY PEAK LOADS WITH CUSTOMER GROWTH THROUGH July 2016 (MW)

Tariff		Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Test Year
GMO	Residential	945	991	701	447	558	750	750	671	687	534	698	878	991
	Small GS	282	279	242	199	177	245	250	227	148	160	183	214	282
	Large GS	150	145	133	100	99	128	146	124	102	175	205	217	217
	Large Power	325	330	317	293	271	268	276	280	263	289	306	330	330
	Lighting	16	16	16	16	16	16	17	17	17	17	17	17	17

Note: These numbers include losses.

WEATHER NORMALIZED MONTHLY COINCIDENT PEAK LOADS (MW) for GMO

WEATHER NORMALIZED MONTHLY COINCIDENT PEAK LOADS WITH CUSTOMER GROWTH THROUGH July 2016 (MW)

Tariff		Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Test Year
GMO	Residential	945	991	690	408	551	750	750	671	687	518	680	878	991
	Small GS	261	235	239	191	159	182	181	174	136	141	158	186	261
	Large GS	126	114	125	97	89	104	88	110	102	158	187	202	126
	Large Power	312	322	300	287	258	262	258	273	250	283	294	325	322
	Lighting	0	0	1	0	16	0	17	0	0	0	0	0	17
	Total Retail	1,643	1,663	1,355	984	1,073	1,298	1,295	1,228	1,175	1,099	1,321	1,591	1,663
	Sales for Resale	6	6	5	3	4	5	5	5	4	3	4	5	6
	Total System	1,650	1,669	1,360	987	1,077	1,303	1,299	1,233	1,179	1,103	1,324	1,596	1,669

Note: These numbers include losses.