

Exhibit No.:
Issue(s): SRLE, Estimated Bills
Witness: Robin Kliethermes
Sponsoring Party: MoPSC Staff
Type of Exhibit: Supplemental Rebuttal
Testimony
Case No.: ER-2019-0374
Date Testimony Prepared: May 12, 2020

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF-RATE DESIGN DEPARTMENT

SUPPLEMENTAL REBUTTAL TESTIMONY

OF

ROBIN KLIETHERMES

THE EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2019-0374

Jefferson City, Missouri
May 2020

Supplemental Rebuttal Testimony of
Robin Kliethermes

A. Possibly. On page 15 of Ms. Richard’s supplemental testimony, she states that “Using the data provided in the Company’s response to DR 0246, the number of residential customer bills that were estimated over Staff’s test period of August 2018 through July 2019, was 39,622 out of 1,566,231 bills or about 2.5%.” However, the level of estimated bills that Staff calculated from DR. 0246 and DR. 0255 were much higher than in Ms. Richard’s Supplemental Testimony, with a reported level of 39,622 estimated bills during the period. In further discussions with Empire, Empire asserts that the data originally provided to Staff was recently discovered by Empire to contain errors and double counted certain customer bills. Empire stated that it is reviewing all of the information and will provide supplemental responses to data requests 255 and 246 with the correct level of estimated bills. The table below provides the values that Empire asserts are the correct levels of estimated bills included in Staff’s test year.¹

Month	Bills		
	Estimated	Total	% Estimated
Aug '18	8,837	129,901	6.80%
Sep '18	3,981	129,746	3.07%
Oct '18	8,962	129,782	6.91%
Nov '18	6,551	130,374	5.02%
Dec '18	6,818	130,643	5.22%
Jan '19	308	130,773	0.24%
Feb '19	243	130,849	0.19%
Mar '19	434	130,887	0.33%
Apr '19	377	130,759	0.29%
May '19	564	130,718	0.43%
Jun '19	538	130,903	0.41%
Jul '19	2,009	130,896	1.53%
Total	39,622	1,566,231	2.53%

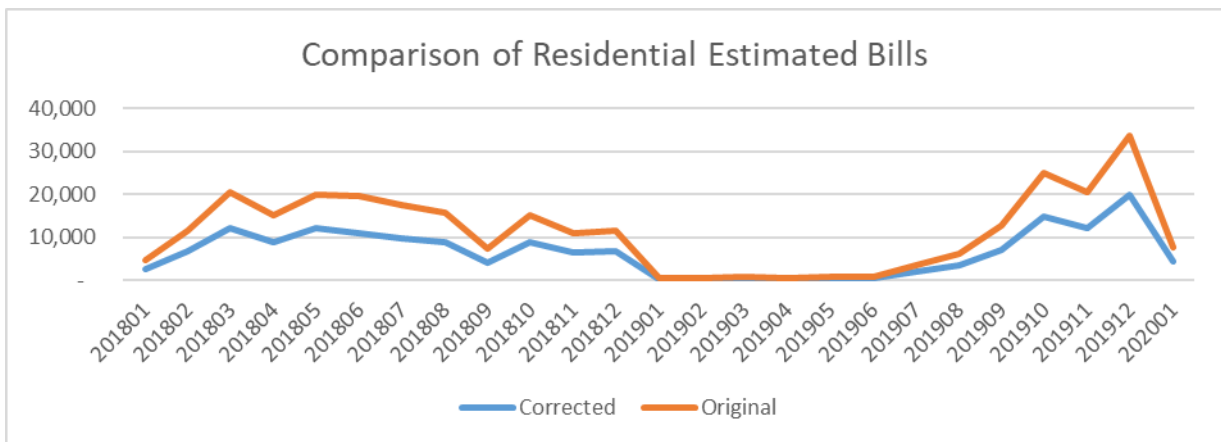
¹ The table was provided in Empire’s supplemental testimony workpapers.

1 However, at the time of this filing Staff has not received supplemental responses to data
2 requests 246 and 255.

3 Q. How do Empire's corrected estimated bill counts compare to Empire's originally
4 provided estimated bill counts?

5 A. Below is a graph showing the comparison.²

6



7

8 Q. Do the corrections to Empire's level of estimated bills change Staff's positions
9 concerning future estimation and meter reading practices or the reliability of billing
10 determinants in this case?

11 A. No. The level of estimated bills for calendar year 2018 and July through
12 December 2019 are still large and raise concerns.

13 Q. Does a lower level of estimated bills decrease the impact that estimated bills
14 would have on Staff's normalized and annualized billing determinants established in this case
15 and used in the SRLE?

16 A. Yes. Although, the total level of billing determinants for Staff's test period will
17 not change based on the number of estimated bills, a lower level of estimated bills means more

² The comparison was derived using Empire's supplemental testimony workpaper and Empire's verbal description of the corrections to the data.

Supplemental Rebuttal Testimony of
Robin Kliethermes

1 usage is based on actual customer usage which increases Staff's confidence in the
2 appropriateness of Staff's total billing determinants. But without the supplemental responses
3 to data requests 246 and 255 Staff cannot quantify the impact at this time. Staff did not receive
4 the supplemental responses to data requests 246 and 255 by 11:00am on May 12, 2020 in order
5 to finalize and file testimony. Due to the deadline for filing rebuttal testimony and responsive
6 briefs, Staff could only wait until 11:00am on May 12, 2020 in order to review and incorporate
7 responses from the data requests.

8 Q. Does this conclude your testimony?

9 A. Yes.

