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

1		SUPPLEMENTAL REBUTTAL TESTIMONY		
2		OF		
3		ROBIN KLIETHERMES		
4		THE EMPIRE DISTRICT ELECTRIC COMPANY		
5		CASE NO. ER-2019-0374		
6	Q.	Please state your name and business address.		
7	A.	My name is Robin Kliethermes and my business address is Missouri Public		
8	Service Commission, P.O. Box 360, Jefferson City, Missouri, 65102.			
9	Q.	By whom are you employed and in what capacity?		
10	A.	I am employed by the Missouri Public Service Commission ("Commission") as		
11	the Rate & Tariff Examination Manager of the Tariff and Rate Design Department of the			
12	Industry Analysis Division.			
13	Q.	Are you the same Robin Kliethermes that supported sections in Staff's		
14	Class Cost of Service report (CCOS), filed rebuttal, surrebuttal/true-up direct and supplementa			
15	testimony in this case?			
16	A.	Yes.		
17	Q.	What is the purpose of your testimony?		
18	A.	The purpose of my testimony is to respond to Empire's witness Sheri Richard's		
19	supplemental testimony regarding estimated bills.			
20	RESPONSI	E TO ESTIMATED BILLS		
21	Q.	Has Staff received information that would cause changes to its calculations of		
22	the level of estimated bills in Staff's test period?			

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.\(^1\)

ı	Ά.
1	J

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.

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- Q. How do Empire's corrected estimated bill counts compare to Empire's originally provided estimated bill counts?
 - A. Below is a graph showing the comparison.²

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

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

- Q. Does a lower level of estimated bills decrease the impact that estimated bills would have on Staff's normalized and annualized billing determinants established in this case and used in the SRLE?
- A. Yes. Although, the total level of billing determinants for Staff's test period will 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

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

- Q. Does this conclude your testimony?
- A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of The Empire District Electric Company's Request for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area) Case No. ER-2019-0374)		
AFFIDAVIT OF RO	DBIN KLIETHERMES		
STATE OF MISSOURI)			
COUNTY OF COLE) ss.			
COMES NOW ROBIN KLIETHERMES	and on her oath declares that she is of sound mind		
and lawful age; that she contributed to the fore	egoing Supplemental Rebuttal Testimony; and that		
the same is true and correct according to her be	st knowledge and belief, under penalty of perjury.		
Further the Affiant sayeth not.			
	_/s/ Robin KliethermesROBIN KLIETHERMES		