

Exhibit No.:
Issue: MEEIA Annualization
Witness: Sarah L. Kliethermes
Sponsoring Party: MoPSC Staff
Type of Exhibit: True-up Direct Testimony
Case No.: ER-2016-0285
Date Testimony Prepared: March 1, 2017

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

AUDITING

TRUE-UP DIRECT TESTIMONY

OF

SARAH L. KLIETHERMES

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2016-0285

Jefferson City, Missouri
March, 2017

1 **TRUE-UP DIRECT TESTIMONY**

2 **OF**

3 **SARAH L. KLIETHERMES**

4 **KANSAS CITY POWER & LIGHT COMPANY**

5 **CASE NO. ER-2016-0285**

6 Q. Are you the same Sarah Kliethermes that contributed to Staff’s Report on
7 Class Cost of Service and Rate Design (“CCOS Report”), Staff’s Report on Commission
8 Raised Issues, and filed Rate Design Rebuttal and Surrebuttal?

9 A. Yes.

10 Q. What is the purpose of your true-up testimony?

11 A. The purpose of my testimony is to address the Commission Staff’s (“Staff”)
12 true-up energy efficiency adjustment for Kansas City Power & Light Company’s (“KCPL”)
13 MEEIA Cycle 2 kWh savings.

14 Q. What adjustment did Staff make for MEEIA cycle 2 kWh savings?

15 A. Staff witness Dr. Seoung Joun Won made a true-up energy efficiency
16 adjustment consistent with paragraph II.10.a.(i) of the Non-Unanimous Stipulation and
17 Agreement Resolving MEEIA Filings (“Cycle 2 Stipulation”) approved in Case. No.
18 EO-2015-0240.¹ Staff’s witness Michael Stahlman made an adjustment to true-up billing
19 determinants consistent with paragraph II.10.b. of the Cycle 2 Stipulation.

20 Q. What does paragraph II.10.a. of the Cycle 2 Stipulation state?

¹ Kansas City Power & Light Company, P.S.C. MO. No. 7. Original Sheet Nos. 49K and 49L

1 A. Paragraph II.10.a., concerning *kWh usage*, provides as follows:

2 a. Test period weather normalized kWh usage for each
3 customer class by billing month will be adjusted by⁶:

4 (i) Adding back the monthly kWh energy savings by customer
5 class incurred during the test period from all active MEEIA programs,
6 excluding Home Energy Reports and Income-Eligible Home Energy
7 Reports programs which have a one-year measure life, determined
8 using the same methodology as described in Tariff Sheet 49K and 49L
9 (KCP&L) and in Tariff Sheet 138.4 and 138.5 (GMO) except that
10 calendar month load shape percentages by program by month will be
11 converted to reflect billing month load shape percentages by program
12 by computing a weighted average of the current and succeeding month
13 percentages.

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

25 Q. What does paragraph II.10.c. of the Cycle 2 Stipulation state?

26 A. Paragraph II.10.c., concerning *kW demand*, provides as follows:

27 c. Test period kW demand for each customer class will be
28 adjusted by⁷:

29 (i) Adding back the monthly kW demand savings by customer
30 class incurred during the test period from all active MEEIA programs,
31 excluding Home Energy Reports, Income-Eligible Home Energy
32 Reports and Demand Response Incentive programs, determined using
33 the same methodology as described for kWh savings in Tariff Sheet
34 49K and 49L (KCP&L) and in Tariff Sheet 138.4 and 138.5 (GMO)
35 and then:

36 (ii) Subtracting the cumulative annual kW demand savings from
37 the first month of the test period through the month ending where
38 actual results are available (most likely two months prior to the true-up
39 date) by customer class from all active MEEIA programs, excluding
40 Home Energy Reports, Income-Eligible Home Energy Reports and

1 Demand Response Incentive programs, determined using the same
2 methodology as described for kWh savings in Tariff Sheet 49K and
3 49L (KCP&L) and in Tariff Sheet 138.4 and 138.5 (GMO).

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

14 Q. Did Staff adjust hourly load shapes as specified by paragraph II.10.c. of the
15 Cycle 2 Stipulation?

16 A. No. Staff made no adjustment of hourly load shapes as specified in paragraph
17 II.10.c. According to the Company's response to Staff's data request No. 0328, KCPL does
18 not have hourly load shapes or marginal loss factors for the MEEIA Cycle 2 programs. Due to
19 KCPL's inability to provide the hourly load shapes or marginal loss factors, Staff was unable
20 to make the adjustment specified above.

21 Q. Does that conclude your testimony?

22 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light)
Company's Request for Authority to) Case No. ER-2016-0285
Implement A General Rate Increase for)
Electric Service)

AFFIDAVIT OF SARAH L. KLIETHERMES

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW SARAH L. KLIETHERMES, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing True-Up Direct Testimony; and that the same is true and correct according to her best knowledge and belief.

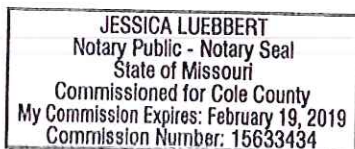
Further the Affiant sayeth not.

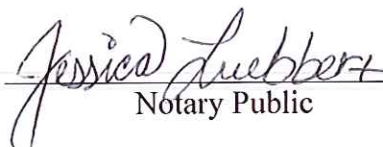


SARAH L. KLIETHERMES

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 1st day of March, 2017.





Notary Public