

Exhibit No.:  
Issue: Class Cost of Service; Rate Design;  
Revenues  
Witness: Marisol E. Miller  
Type of Exhibit: Surrebuttal Testimony  
Sponsoring Party: Kansas City Power & Light Company  
and KCP&L Greater Missouri  
Operations Company  
Case Nos.: ER-2018-0145 and ER-2018-0146  
Date Testimony Prepared: September 4, 2018

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NOS.: ER-2018-0145 and ER-2018-0146**

**SURREBUTTAL TESTIMONY**

**OF**

**MARISOL E. MILLER**

**ON BEHALF OF**

**KANSAS CITY POWER & LIGHT COMPANY and  
KCP&L GREATER MISSOURI OPERATIONS**

**Kansas City, Missouri  
September 2018**

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**SURREBUTTAL TESTIMONY**

**OF**

**MARISOL E. MILLER**

**Case Nos. ER-2018-0145 and ER-2018-0146**

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

2 A: My name is Marisol E. Miller. My business address is 1200 Main, Kansas City, Missouri  
3 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 –  
6 Regulatory Affairs.

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

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

10 **Q: Are you the same Marisol E. Miller who filed Direct and Rebuttal Testimony in**  
11 **both ER-2018-0145 and ER-2018-0146?**

12 A: Yes, I am.

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

14 A: The purpose of my rebuttal testimony is to respond to certain issues presented by parties  
15 to this proceeding. Those issues include:

1 I.) CLASS COST OF SERVICE (“CCOS”)

2 IN RESPONSE TO TESTIMONY REGARDING THE CUSTOMER CHARGE

3 a. Residential Customer charge calculation as presented in the rate design  
4 rebuttal testimony of the Missouri Public Service Commission Staff  
5 (“Staff”) witness Robin Kliethermes;

6 b. The desire to keep the residential customer charge unchanged or decreased  
7 in the rate design rebuttal testimony of the Division of Energy’s (“DE”)  
8 witness Martin Hyman and the Office of Public Counsel (“OPC”) witness  
9 Geoff Marke;

10 c. The allocation of AMI meter costs to the residential customer charge as  
11 discussed in the rate design rebuttal testimony of the OPC witness Karl  
12 Pavlovic and Renew Missouri’s witness Jamie Scripps;

13 II.) RATE DESIGN

14 IN RESPONSE TO TESTIMONY REGARDING TOU RATES & RATE DESIGN

15 a. Concerns regarding Staff’s mandatory time-differentiated rates as  
16 discussed in the rate design rebuttal testimonies of OPC witness, Geoff  
17 Marke and DE witness Martin Hyman;

18 b. Concerns regarding Company TOU proposals and compliance with prior  
19 commission orders as discussed in the rate design rebuttal testimony of  
20 Staff witness Sarah Lange;

21 c. Concerns regarding seasonality as discussed in the rate design rebuttal  
22 testimony of Staff witness Sarah Lange;

1 III.) REVENUES

2 IN RESPONSE TO TESTIMONY REGARDING TEST YEAR REVENUES/BILLING

- 3 a. The lack of a MEEIA demand adjustment to test year revenues as outlined  
4 in the rebuttal testimony of Staff witness Robin Kliethermes;

5 I. CCOS

6 **Q: Do you agree with Ms. Kliethermes' rate design rebuttal testimony on page two**  
7 **where she asserts that the Company included several costs, such as Low-Income**  
8 **Weatherization, Economic Relief Pilot Program ("ERPP"), Pre-MEEIA DSIM ,**  
9 **Electric Vehicle Charging Station and billing system costs that have not previously**  
10 **been included in the calculation of the residential customer charge?**

11 A: I do not agree with her statement as it implies the Company has chosen to change the  
12 classification of costs within the CCOS Study, which we have not. Accounts 908 and  
13 910, where the Low-Income Weatherization, ERPP, Pre-MEEIA DSIM, and Electric  
14 Vehicle Charging Station costs were recorded in the case, have been consistently  
15 classified as customer-related and allocated to the customer charge using the CUST12  
16 allocator. Billing system costs will be discussed later in this testimony.

17 **Q: Please explain why the ERPP should be included in the residential customer charge.**

18 A: Inclusion of ERPP in account 908, and the classification of the costs as customer-related,  
19 is consistent with prior rate cases. This program delivers energy affordability benefits to  
20 qualifying low-income customers who may not be able to stay connected to the system if  
21 this program was not available.

22 **Q: Do you agree with Staff that the Low-Income Weatherization Program was not**  
23 **included in the residential customer charge in the Company's previous rate cases?**

1 A: Yes, this program was formerly a MEEIA program and excluded in prior CCOS Studies.  
2 However, the Commission determined in 2014 that the Low-Income Weatherization  
3 program should be recovered through base rates<sup>1</sup> instead of MEEIA. Removal of the  
4 program from MEEIA required it to be included in customer-related costs in this CCOS  
5 Study.

6 **Q: Do you agree with Staff that the costs for the Clean Charge Network (“CCN”)**  
7 **included by the Company in this case have not previously been included in the**  
8 **calculation of the residential customer charge?**

9 A: Yes, the inclusion of Electric Vehicle Charging Station costs in this Study reflects new  
10 costs incurred by the Company for the operation and maintenance of the CCN. Vehicle  
11 charging stations connect customers with electric vehicles to the electric system and are  
12 installed to provide access for anyone in the service territory.

13 **Q: How would the inclusion of these costs impact the Staff’s proposed residential**  
14 **customer charge?**

15 A: The Staff’s proposed residential customer charge for KCP&L would increase by  
16 approximately \$0.22 and GMO would increase approximately \$0.20.

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<sup>1</sup> Report and Order, File No. ER-2014-0370, September 2, 2015, p. 102.

1 **Q: Do you agree with Ms. Kliethermes contention on page three of her rate design**  
2 **rebuttal testimony, that costs for Low-Income Weatherization, ERPP and Electric**  
3 **Vehicle charging stations are not necessary to connect a customer to the system and**  
4 **should therefore be removed from the calculation of the residential customer**  
5 **charge?**

6 A: No. The Low-Income Weatherization and ERPP programs are in place to provide a  
7 means for residential customers to manage their electric costs to maintain service in their  
8 home. Vehicle charging stations are in place to provide a means for all customers in the  
9 service territory to connect their electric vehicle to the electric system. Given the nature  
10 of these costs, they should be recovered from customers in a consistent manner and best  
11 achieved through the customer charge.

12 **Q: Do you agree with Ms. Kliethermes' rate design rebuttal testimony on page four**  
13 **where she claims that the Company would recover the costs of the electric vehicle**  
14 **charging stations from the customer charges for each rate class, and also from the**  
15 **revenues recovered under the Clean Charge Network tariff?**

16 A: I do not agree with her statement. The CCOS Study recovers the costs of the CCN assets  
17 recorded in account 371.010, whereas the CCN tariff rates recover the expenses that are  
18 generated from the customers' use of the charging stations.

19 **Q: Staff indicated that it could not verify that KCP&L's solar rebates were removed**  
20 **from the customer charge. Did the Company adjust the residential customer charge**  
21 **to remove the cost of solar rebates from the calculation of the customer charge?**

22 A: Yes, the costs were removed. I agree that Staff did not have the data to verify the  
23 Company's adjustment to remove the solar rebates from the residential customer charge.

1 **Q: Do you agree with Staff that like the solar rebates, Pre-MEEIA costs should be**  
2 **removed from the Customer Charge?**

3 A: Yes.

4 **Q: Did the Company accurately adjust the proposed residential customer charge for**  
5 **Pre-MEEIA costs and Pre-MEEIA opt-out costs in its direct filing in this case?**

6 A: No, we inadvertently ignored these costs when making the adjustment and therefore  
7 overstated the proposed customer charge. Our direct filing reflected annual amortization  
8 amounts of \$8,904,690 for Pre-MEEIA and \$943,252 for Pre-MEEIA opt-out costs. Had  
9 we removed those costs from the customer charge calculation, the proposed customer  
10 charge would have been \$12.08, \$2.84 less than proposed. Schedule MEM-6 is provided  
11 which details this calculation.

12 **Q: Do you agree with Ms. Kliethermes' rate design rebuttal testimony contention (at p.**  
13 **5) that the entire investment in the billing system was allocated to KCP&L and none**  
14 **of the investment was allocated to GMO?**

15 A: I do not agree with her statement. GMO's share of the investment, as an annual expense  
16 amount, was transferred from KCP&L to GMO through a common use billing adjustment  
17 (CS-117) which was a reduction to account 922 in KCP&L's Cost of Service ("COS")  
18 Model and an increase to account 922 in GMO's COS. The billing system ("One CIS")  
19 investment is held as an asset on KCP&L's books. Account 922 within the CCOS Study  
20 Model is allocated to the customer classes on a Sal & Wages basis which classifies costs  
21 as demand-, energy-, and customer-related.



1 **Q: Do you agree with Ms. Kliethermes' assertion on page four of her rate design**  
2 **rebuttal testimony that a large portion of the One CIS investment is functionalized**  
3 **to the customer component so that the return on the investment is included in the**  
4 **calculation of the customer charge?**

5 A: Her statement is incorrect. She correctly stated that the One CIS investment was  
6 recorded to account 303-Miscellaneous Intangible Plant, but erred in stating that a large  
7 portion of the investment is included in the customer charge. The investment was  
8 recorded to the 303 Miscellaneous Intangible Plant – PTD Related row which  
9 functionalized approximately 97% of the cost as Demand and the remaining as Customer.

10 **Q: Regarding DE and OPC concerns about the customer charge, do you agree with Mr.**  
11 **Hyman's and Dr. Marke's (pages 6 and 20 respectively) rate design rebuttal**  
12 **testimony expressing a desire to keep the Residential Customer Charge unchanged**  
13 **or even be reduced?**

14 A: No. The Company's primary objective in recent cases has been to have the customer  
15 charge be reflective of the underlying customer related costs as much as possible. The  
16 Company proposal attempts to recognize cost causation and align with recent  
17 Commission orders instead of attempting to artificially constrain the customer charge.

18 **Q: What was the objective of the replacement of the AMR meters, the AMI Refresh**  
19 **Project, in KCP&L's and GMO's service territory?**

20 A: As stated in the direct testimony of Company witness Scott Heidtbrink in the ER-2014-  
21 0370 rate case "The objective of this project is to replace the network technology and  
22 approximately 500,000 meters that are nearing the end of their useful life." This was  
23 again stated in Mr. Heidtbrink's direct testimony in the ER-2016-0285 rate case. In

1 addition to Mr. Heidtbrink’s filed testimony, a Company web page<sup>2</sup> contains the  
2 following statement regarding the Project: “This project was launched as we regularly  
3 upgrade our metering infrastructure to ensure consistent, reliable service in keeping with  
4 industry standards”.

5 **Q: Were other technologies or systems installed coincident to the AMI meter installs?**

6 A: Yes, meter data management software and an outage management system were installed  
7 to coincide with the installation of AMI meters.

8 **Q: What is the purpose of these technologies/systems?**

9 A: Mr. Heidtbrink’s direct testimony in ER-2014-0370 and ER-2016-0285 stated the Meter  
10 Data Management (“MDM”) “can be used to assess and improve operational efficiency  
11 in a number of areas, including billing, revenue protection, outage management and  
12 customer service. He also stated that the Outage Management System (“OMS”) will  
13 enhance the customer experience by providing expanded customer communication  
14 capabilities, particularly related to estimated restoration time.”

15 **Q: What FERC Plant Account are these costs recorded to?**

16 A: Costs for the MDM and OMS were recorded to account 303-Intangible Plant as five-year  
17 and ten-year software, respectively, and classified as customer-related.

18 **Q: Given the expressed purpose of the AMI Meter Refresh, do you agree with Mr.  
19 Pavlovic that the meter costs were incorrectly recorded to FERC Plant Account  
20 370?**

21 A: No. The AMI meter costs should remain in account 370 and continue to be classified as  
22 customer-related.

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<sup>2</sup> <https://www.kcpl.com/about-kcpl/company-overview/ami-refresh>

1 **Q: Prior to the AMI Meter Refresh, was KCP&L able to analyze meter data for the**  
2 **purposes listed by Mr. Pavlovic?**

3 A: KCP&L followed a standard industry practice of installing meter technology for a  
4 manageable number of customers across the service territory which provided a sample set  
5 of data that represented system characteristics. The results of the sample data,  
6 specifically, hourly load information, could have been utilized to provide some level of  
7 insight for the purposes presented by Mr. Pavlovic as additional benefits of AMI.  
8 Although, an AMI system provides more timely and complete data flow which enables an  
9 increased opportunity for analysis. So, by Mr. Pavlovic's logic, even some of the AMR  
10 meters used prior to the AMI Refresh should've been recorded outside FERC account  
11 370, functionalized as general plant and not classified as customer related, which is  
12 clearly incorrect and not in line with historical CCOS studies completed by the Company  
13 and Commission orders.

14 **Q: Why do you believe that utilization of the general plant allocator is inappropriate?**

15 A: Primarily because Mr. Pavlovic assumes the Company is 100% AMI implemented with  
16 full integration to all sub-systems that would offer the full benefits he's identified which  
17 is not the case. He also presents a generalization that AMI meters are installed for many  
18 more purposes than simply measuring the amount of electricity delivered to customers,  
19 which was not the case for the Meter Refresh.

1 **Q: Do you agree with Ms. Scripps' similar argument that because AMI meters provide**  
2 **advanced capabilities that go beyond meter reading and billing, meter costs should**  
3 **be recovered by residential customers through their energy charge?**

4 A: I do not agree. She was correct to focus on the identification of the functionality and  
5 enhancements of AMI meters over traditional non-AMI meters in her DR RM-003, but  
6 erred in the classification of the items included in the Company's response. Daily meter  
7 readings, daily usage, remote connect/disconnect, meter temperature monitoring, tamper  
8 and diversion; and move-in/move-out readings are all great examples that relate to  
9 making service available to the customer and therefore are customer-related.

10 **Q: Has the Company fully implemented AMI?**

11 A: As outlined in DR's 5022 in docket ER-2018-0145 and 5023 in ER-2018-0146, the  
12 Company is not yet 100% AMI in either KCP&L or GMO. As stated in those DR's, the  
13 Company plans to have 100% deployment in both jurisdictions by December 31, 2020.  
14 Given this, it's the Company's position that treatment of meter asset costs within the  
15 CCOS should remain consistent with prior practices.

16 **Q: How are other Missouri or Kansas utilities with AMI meters allocating these costs?**

17 A: Westar Energy's CCOS Study supporting their 2018 rate case accounts for advanced  
18 meter asset costs under Plant Account 370-Meters, and classified as customer-related.  
19 Ameren – Missouri currently has no AMI meters installed.

1 **Q: Do you agree with Mr. Pavlovic’s comment on page six and beginning on line 12 of**  
2 **his rate design rebuttal testimony which states “Because KCPL/GMO functionalizes**  
3 **the AMI meters as distribution plant classified as customer-related, AMI meters are**  
4 **allocated to customer classes based on the number of customers in the class. The**  
5 **result is that customer classes with relatively large numbers of customers are over**  
6 **allocated AMI meter costs and customer classes with relatively small numbers of**  
7 **customer are under allocated AMI meter costs[.]”?**

8 A: No. KCP&L and GMO CCOS Models allocate account 370 on the Study’s CUST5  
9 allocator based on the cost of customer meters in service by class. This allocation  
10 method ensures that each class is allocated the amount of meter costs that are specifically  
11 associated with the value of the meters in service in the class.

12 **Q: Did Ms. Scripps accurately present the Commission’s conclusions of law and**  
13 **decision in their Report and Order in ER-2014-0370 regarding the inclusion of a**  
14 **portion of costs associated with meter investment to be customer related?**

15 A: No. Ms. Scripps stated, beginning on page two of her rate design rebuttal testimony, that  
16 “The Commission has previously ruled that customer charges should be limited to ‘those  
17 costs necessary to make electric service available to the customer, regardless of the level  
18 of electric service utilized. Examples of such costs include monthly meter reading,  
19 billing, postage, customer accounting services expenses, a portion of costs associated  
20 with meter investment, and the service line.” This statement from paragraph 205 of the  
21 Report and Order was actually a finding of fact, not a conclusion of law and decision.  
22 The conclusion and decision on the issue of residential customer charge in that Report

1 and Order did not modify the fundamental basis that the costs associated with meter  
2 investment should be included in the customer charge.

## 3 **II. RATE DESIGN**

4 **Q: Do you agree with OPC and DE's (Dr. Marke's rate design rebuttal testimony page**  
5 **18. And Mr. Hyman's rate design rebuttal testimony pgs. 10-14) concerns regarding**  
6 **Staff's mandatory time-differentiated rates?**

7 A: Yes. I agree wholeheartedly with OPC and DE's positions regarding the need for  
8 customer education and an opt-in period. Additionally, I echo Mr. Hyman's surprise  
9 regarding Staff's mandatory time-differentiated rate proposal, as it completely ignores the  
10 Company's TOU study recommendations that include an offering of TOU pilots to start,  
11 providing extensive customer education, and analysis of pilot results prior to expanding  
12 the offering to the entire residential class. If Staff's proposal were to be ordered, it begs  
13 the question of why the Company was ordered to perform a study of TOU rates at all, if  
14 the recommendations would be largely ignored. Furthermore, while it's still unclear what  
15 Staff's goals are regarding price signal or change in customer behavior with their  
16 proposal, which I understand Staff believes to be minimal, the fact remains that without  
17 time differentiated billing determinants (which do not currently exist), to support their  
18 proposal, there is no absolute certainty as to the bill impacts to the customer or the  
19 revenue requirement impacts to the Company, despite Staff's assertions otherwise.

20 **Q: Has the Company attempted to perform any additional analysis to estimate**  
21 **potential impacts to Staff's proposal?**

22 A: While the Company continues to be uncertain as to the impacts of Staff's proposal due to  
23 the lack of time differentiated billing determinants, we did attempt to go beyond the

1 estimates provided by Staff that only used a small, sampled data set. Instead, the  
2 Company used Load Research Data<sup>3</sup> and then layered on the peak/off-peak periods as  
3 proposed by Staff to all of the test year billing determinants through October 2017 for the  
4 Residential General Use rate code and the Space Heating Class in order to determine bill  
5 impact ranges across the customers. The Company was able to determine that average  
6 customer impacts could range between -10.72% and -7.7% for Residential General Use  
7 and 1.35% and 14.4% for Space Heating Customers. These ranges assume no change in  
8 customer behavior and that all customers in each rate code are affected equally. The  
9 Company continues to study the impacts of Staff’s proposal as there has been no  
10 consideration to how extreme the range of individual impacts may be nor the potential  
11 number of said customers that would be lost in the modeled “average customer.”

12 Although I believe the estimates I just provided are more reflective of the likely  
13 impact of Staff’s time-differentiated rates, I would reiterate the fact that time-  
14 differentiated billing determinants do not exist. Without such billing determinants, I do  
15 not believe impact estimates can be produced with a meaningful degree of reliability.

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<sup>3</sup> The load research data for the test year 07/16 through 6/17, plus the 4 additional months through 10/17, was used for this determination. Using the on- and off-peak periods shown in Staff’s Class Cost of Service Report on page 36, a time-of-use schedule was created within Oracle Utilities Load Analysis (OULA/LodeStar) software to determine the percentages of on- and off-peak usages by month for each jurisdiction’s Residential General Use and Residential Space Heating classes. Those percentages were then applied to the monthly sub-class test-year billing determinants to establish potential impacts.

1 **Q: The Staff (pg. 28 of Lange rate design rebuttal testimony) attempted to**  
2 **elaborate/expand on their Direct filing regarding their mandatory time-**  
3 **differentiated rate proposal. Is there any new concerns that have come to light as**  
4 **discussed in their rebuttal testimony?**

5 A: Yes. In addition to the overall concerns outlined above regarding customer impacts and  
6 the revenue requirement uncertainty due to a lack of time differentiated billing  
7 determinants, the Company is greatly concerned with the additional layers of complexity  
8 and uncertainty that accompanies Staff's suggestions specific to seasonal shifts. Staff's  
9 extension of their mandatory time-differentiated rates mainly serves to exacerbate the  
10 uncertainty that already plagues their original proposal.

11 **Q: Do you agree with Staff witness Sarah Lange's rate design rebuttal testimony (pg.8)**  
12 **regarding the Company's compliance with prior Commission rate case orders for**  
13 **GMO?**

14 A: In part, yes, but in parts no. The Company agrees with Staff that the following is  
15 included Commission-Approved Stipulation, in pertinent part:

16 *GMO will include in its direct filing in its next rate case or rate*  
17 *design case a study of TOU rates for GMO including TOU*  
18 *residential and SGS rates, critical peak rates, Electric Vehicle*  
19 *TOU rates for stand-alone charging stations, TOU rates*  
20 *applicable to Electric Vehicle charging associated with an existing*  
21 *account, Real Time Pricing, Peak Time Rebates, and other rate*  
22 *types which could encourage load shifting/efficiency. GMO will*  
23 *propose rates based on this study no later than its next rate case or*  
24 *rate design case.*

25  
26 The Company agrees that it proposed rates based on the GMO TOU study completed, as  
27 outlined in the Commission approved Stipulation & Agreement (S&A). Additionally, it's  
28 true that in KCP&L's last rate case ER-2016-0285, the Commission ordered the



1 Company to offer TOU rates. The Company has done so. Ms. Lange goes on to assume  
2 that the Company TOU proposals somehow may not be what the Commission had in  
3 mind when approving the S&A or issuing their order(s), when based on the language  
4 included in the S&A, it's clear that the rates proposed would be based on the study  
5 results, not on a predisposed plan. While the KCP&L-specific order did not require a  
6 study, the Company hopes that the Commission sees value in leveraging the learnings  
7 from the GMO TOU studies across its jurisdictions and offering TOU pilots as  
8 recommended in that study. It's unclear why Staff would assume that their mandatory  
9 time-differentiated rate proposal, which largely ignores what the Company learned in its  
10 recent TOU studies (e.g. customer education, price signal, customer impacts, etc.) is any  
11 more responsive to prior rate case Commission orders.

12 **Q: On page 10 of her rate design rebuttal testimony, Staff Witness Ms. Lange expresses**  
13 **concerns regarding seasonality and the seasonal study performed for GMO and**  
14 **submits that weighting production related revenue recovery to the summer months**  
15 **has the impact of dampening the differences in cost causation between the non-**  
16 **summer months that this study was intended to explore. Do you agree?**

17 **A.** No. If the cost driver for the demand portion of the production asset allocation is the  
18 summer months, the principle of cost causation would support allocating the costs to the  
19 summer months. If these summer-driven costs were spread over additional non-summer  
20 months, it would have the effect of dampening the cost impact summer demand places on  
21 the system.

1 **Q: Do you agree with Ms. Lange that GMO has experienced residential class peaks<sup>4</sup> in**  
2 **January that have met/exceeded those experienced in summer months?**

3 A: I agree that in the time period reviewed for the seasonal study, this was true. However,  
4 using the latest load research data used in these rate cases, there was no instance where  
5 the residential class's contribution at system peak in the winter months met or exceeded  
6 those experienced in the summer months. Generally, the Company agrees that it should  
7 continue to monitor this to determine if any seasonal corrections/modifications are  
8 merited in the future for the residential class.

### 9 **III. REVENUES**

10 **Q: Do you agree with Ms. Kliethermes testimony (pg. 3, line 20) regarding the**  
11 **Company's adjustment of large power MEEIA demands?**

12 A: No. Ms. Kliethermes' testimony states that demand minimums for KCP&L and GMO  
13 were not considered. All KCP&L large power customers who received a MEEIA  
14 demand adjustment did not fall below the minimums set by tariff. For GMO, there was  
15 one customer where the billed demand was below the tariff minimum by 1.31KW for two  
16 months after the MEEIA demand adjustment which was corrected in the true-up  
17 workpapers for large power. In addition, demands were MEEIA adjusted only in months  
18 in which there was an actual kWh savings reflected.

---

<sup>4</sup> To clarify, Ms. Lange is referencing the Class's contribution at System Peak vs. the Class Peak.

1 **Q: Does anything in Ms. Kliethermes' testimony explain Staff's lack of a MEEIA**  
2 **adjustment for demands as outlined and required in the MEEIA Stipulation &**  
3 **Agreement?**

4 A: No. However, Ms. Kliethermes does mention on page 3 of her rebuttal testimony that the  
5 Company did not provide load shapes by measure type. Although that information does  
6 not exist, the Company is not aware that Staff has ever requested this information  
7 formally or informally during this rate case. Additionally, the S&A does not require a  
8 load shape by measure to adjust the demands, but a load shape by program. A load shape  
9 by program is what the Company used as a basis for their demand adjustment in order to  
10 be compliant to the S&A. A load shape by program is available and would've been  
11 provided to Staff had they ever requested it.

12 **Q: Has the Company attempted to size the impact of Staff's failure to adjust for these**  
13 **MEEIA demands?**

14 A: Yes, the Company estimates that the Staff's failure to apply a MEEIA demand  
15 adjustment is worth an overstatement of revenues of approximately \$448,000 and  
16 \$565,000 for GMO and KCPL&L respectively.

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

18 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 Implement ) Case No. ER-2018-0145  
A General Rate Increase for Electric Service )

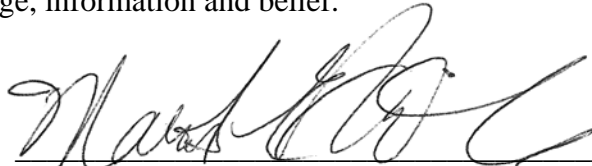
In the Matter of KCP&L Greater Missouri )  
Operations Company's Request for Authority to ) Case No. ER-2018-0146  
Implement A General Rate Increase for Electric )  
Service )

**AFFIDAVIT OF MARISOL E. MILLER**

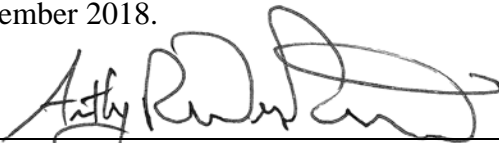
**STATE OF MISSOURI** )  
 ) ss  
**COUNTY OF JACKSON** )

Marisol E. Miller, being first duly sworn on his oath, states:

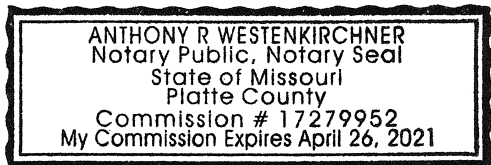
1. My name is Marisol E. Miller. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Supervisor – Regulatory Affairs.
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company consisting of seventeen (17) 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.

  
\_\_\_\_\_  
Marisol E. Miller

Subscribed and sworn before me this 4<sup>th</sup> day of September 2018.

  
\_\_\_\_\_  
Notary Public

My commission expires: 4/26/2021



## CALCULATION OF RESIDENTIAL CUSTOMER CHARGE

(with removal of Solar Rebate and Pre-MEEIA Opt-Out costs)

	A	B	C	D
1	CALCULATION OF RESIDENTIAL CUSTOMER CHARGE			
2	EXCLUDING SOLAR REBATE, PRE-MEEIA, and PRE-MEEIA OPT-OUT ANNUALIZED COSTS			
3				
4	KCP&L-MO CCOS STUDY (KCPL Missouri CCOS 01-02-18 Avg & Excess 4 CP WN.xlsx)			
5				
6				
7				
8	UNBUNDLED tab	MISSOURI RETAIL	RESIDENTIAL	CCOS Cell Ref
9	Equalized Rate of Return Summary Schedule			
10	Customer Component (\$/MO/CUST)		\$17.43	e1307
11				
	Equalized Rate of Return Summary Schedule			
12	Customer Other Cust Accts, Serv, Info	\$20,888,894	\$18,426,164	d1245, e1245
13	Annual Number of Customers		3,057,061	e1254
14	Customer Other Cust Accts, Serv, Info		\$6.03	e1313
15				
16				
17	Total Other Cust Accts, Serv, Info	\$20,888,894		
18	Total Solar Rebates & REC's per CS-116 (Annualized Cost)	\$8,707,741		
19	Total Pre-MEEIA & Opt-Outs per CS-100 (Annualized Cost)	\$9,847,942		
	Total Other Cust Accts, Serv, Info (excl Solar Rebates and Pre-MEEIA Opt-Out Costs)	\$2,333,211		
20				
21				
	Equalized Rate of Return Summary Schedule			
22	Customer Other Cust Accts, Serv, Info	\$2,333,211	\$2,058,133	
23	Annual Number of Customers		3,057,061	
24	Customer Other Cust Accts, Serv, Info		\$0.67	
25				
26	CUSTOMER COMPONENT (\$/MO/CUST)		<b>\$12.08</b>	
27				
28	Direct Filing		\$14.92	
29			\$2.84	