

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

In the Matter of the Application of Kansas City)
Power & Light Company for Authority to) **File No. ER-2018-0145**
Implement a General Rate Increase for Electric)
Service)

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for) **File No. ER-2018-0146**
Authority to Implement a General Rate Increase)
for Electric Service)

**KANSAS CITY POWER & LIGHT COMPANY AND
KCP&L GREATER MISSOURI OPERATIONS COMPANY
STATEMENT OF POSITIONS**

COMES NOW Kansas City Power & Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, the “Company”) and hereby submit this statement of position:

I. Commission Raised Issues

- a. Staff’s Investigation into KCPL’s and GMO’s Review and Response Time Regarding the Approval of Net Metering and Solar Rebate Applications for systems Over 10kW.

Company position: The Commission should decline to take any further action on this issue because the evidence demonstrates that the Company has a good track record of meeting the requisite timelines. (Robinson Surrebuttal, pp. 2-7)

- b. KCPL and GMO Line Extension Issue.

Company position: The Company offers the current KCP&L line extension policy is more beneficial to customers and there are no formal dependencies between MEEIA and the policy. (Lutz Supplemental Direct, pp. 2-14)

II. Load Research – Should the Commission order KCPL and GMO to utilize AMI metering to improve the quality of hourly load information available in future cases?

Company position: The Company was not aware that this is an issue. The Company intends to use AMI metering, as available, to improve the quality of hourly load information available in future cases. (Miller)

III. Rate Design/Class Cost of Service

a. CCOS

- i. What revenue neutral changes to class revenue responsibility, if any, should the Commission order for each utility?

Company position: For KCP&L, based on a jurisdictional increase of 1.88%, the Commission should adopt the class revenue shifts proposed by the Company: Lighting (unmetered) - no increase; Residential – 3.34% increase; remaining classes – 0.97% increase. For GMO, based on a jurisdictional increase of 2.61%, the Commission should adopt the class revenue shifts recommended by the Company: Residential – 3.85% increase; remaining classes – 1.31% increase. (Miller Direct – 0145, pp.11-22; Miller Direct – 0146, pp. 11-22; Miller Rate Design Rebuttal, pp. 3-5; Sullivan Direct – 0145, pp. 3-32; Sullivan Direct – 0146, pp. 3-32; Sullivan Surrebuttal, pp. 2-20; Lutz Direct – 0145, pp. 3-9; Lutz Direct – 0146, pp. 3-9; Lutz Rate Design Rebuttal, pp. 2-8)

b. Residential Rate Design

- i. What residential rate design should be ordered for each utility?

Company position: The Commission should reject Staff's recommendation to implement time-differentiated rates on a mandatory basis for all residential AMI customers and adopt the expanded pilot TOU rates proposed by the Company.

(Winslow Direct – 0145, pp. 12-15; Winslow Direct – 0146, pp. 11-13; Winslow Rate Design Rebuttal, pp. 1-18; Miller Rate Design Rebuttal, pp. 6-13; Miller Surrebuttal, pp. 12-16; Rush Surrebuttal, pp. 11-12; Ives Surrebuttal, pp. 19-24; and Caisley Surrebuttal, pp. 2-4)

- ii. What residential customer charges should be ordered for each utility?

Company position: The Commission should adopt the residential customer charge the Company has proposed for KCP&L (\$15.17) and GMO (\$14.50). (Miller Direct – 0145, p. 23; Miller Direct 0146, pp. 22-23; Miller Rate Design Rebuttal, pp. 13-15)

- iii. Should KCPL’s residential rate schedules be simplified and consolidated as recommended by Staff?

Company position: The Commission should reject Staff’s recommendation to consolidate residential rates into a single residential rate schedule because the full impact on customers of such consolidation, particularly residential space heating customers, has not been sufficiently analyzed. (Miller Rate Design Rebuttal, pp. 15)

- iv. Should the Commission order implementation of KCPL’s and GMO’s proposed Time of Use Pilots? If so, how?

Company position: The Commission should reject Staff’s recommendation to implement time-differentiated rates on a mandatory basis for all residential AMI customers and adopt the expanded pilot TOU rates proposed by the Company. (Winslow Direct - 0145, pp. 12-15; Winslow Direct – 0146, pp. 11-13; Winslow Rate Design Rebuttal, pp. 1-18; Miller Rate Design Rebuttal, pp. 6-13; Miller

Surrebuttal, pp. 12-16; Rush Surrebuttal, pp. 11-12; Ives Surrebuttal, pp. 19-24; and Caisley Surrebuttal, pp. 2-4)

c. Non-Residential Rate Design

- i. What Rate Designs should be ordered for each utility's non-residential classes?

Company position: *The Commission should adopt the Company's recommended non-residential rate design. For GMO, reflecting a 1.31% (50% of the overall jurisdictional increase of 2.61%) increase for the non-residential classes, the increase would be applied on an equal percentage basis, excluding LED Municipal Street Lighting rates. For LPS and LGS, 75% of this 1.31% increase would be applied to the second energy block with the remaining 25% to applied to the remaining components. For KCP&L-MO, reflecting a 0.94% (50% of the overall jurisdiction increase of 1.88%) increase for the non-residential classes, the increase would be applied on an equal percentage basis. For LPS and LGS, 75% of this 0.94% increase would be applied to the second energy block with the remaining 25% to applied to the remaining components. (Miller Direct, pp. 23)*

IV. Tariffs

- a. Restoration Charge – Should a restoration charge be added to each utility's tariffs as requested by KCPL and GMO?

Company position: *The Commission should approve the service restoration charge proposed by the Company as it would ensure customers would be unable to benefit from disconnection and reconnection to the Company system, avoiding charges they would have otherwise paid if they had continued service. (Lutz Surrebuttal, pp. 28-29)*

- b. Special Contracts – Should each utility’s special contract tariffs be revised as proposed by KCPL and GMO?

Company position: The Commission should approve the Company’s revisions, given those revisions largely reflect elimination of references to the RTP tariff. If there’s no RTP tariff, references to an eliminated tariff is inappropriate. (Miller Direct, Schedules GMO MEM-7 and KCPL-MO MEM-4; and Rush Surrebuttal, p. 11)

- c. Real Time Pricing – Should the Commission eliminate or unfreeze each utility’s Real Time Pricing tariffs?

Company position: The Commission should approve the Company’s proposal to eliminate RTP tariffs for KCP&L and GMO. (Miller Direct – 0145, p. 24; Miller Direct – 0146, pp. 23-24; Rush Surrebuttal, pp. 7-11)

- d. Other Studies – Should the Commission order KCPL and GMO to complete the studies recommended by Staff, including (1) seasonal rates; (2) alignment of billing seasons between utilities; (3) study and retention of billing determinants to develop more complex rate designs including but not limited to coincident peak demand; and (4) development and recording of facility extensions by customer and/or class?

Company position: The Commission should reject a seasonal rate study and a study of the development and recording of facility extensions by customer and/or class, as these have already been performed (seasonal) or are unnecessary. The Commission should order a study of the alignment of the summer and winter seasons between utilities and a study and retention of billing determinants associated with coincident peak demand (Miller Rate Design Rebuttal, pp. 21-23).

- e. Under-Utilized Infrastructure Tariff – Should the Commission adopt the under-utilized infrastructure tariff proposed by KCP&L and GMO?

Company position: The Commission should approve the under-utilized infrastructure tariff proposed by the Company for KCP&L and GMO. (Lutz Direct – 0145, pp. 33-36; Lutz Direct -0146, pp. 34-36; and Lutz Surrebuttal, pp. 22-25)

V. Riders

- a. Renewable Energy Rider – Should the Commission order implementation of a renewable energy rider for each utility? If so, should the unsubscribed energy flow through each utility’s FAC, or should any other recommendations made by parties be adopted?

Company position: The Commission should adopt the renewable energy program tariff as proposed and modified by the Company for both KCP&L and GMO without adopting any of the other changes recommended by Staff, OPC, DED-DE or Renew MO. (Winslow Direct – 0145, pp. 9-12; Winslow Direct – 0146, pp. 8-11; Lutz Direct -0145, pp. 18-28; Lutz Direct – 0146, pp. 18-29; Lutz Rate Design Rebuttal, pp. 10-12; Lutz Surrebuttal, pp. 11-18)

- b. Solar Subscription Rider – Should the Commission order the implementation of a solar subscription rider for each utility? If yes, should the Commission order the adoption of any other recommendations made by parties?

Company position: The Commission should adopt the solar subscription tariff as proposed and modified by the Company for both KCP&L and GMO without adopting any of the other changes recommended by Staff, OPC, DED-DE or Renew MO. (Winslow Direct – 0145, pp. 3-8; Winslow Direct – 0146, pp. 3-8; Lutz Direct -0145, pp. 9-18; Lutz Direct – 0146, pp. 9-18; Lutz Rate Design Rebuttal, pp. 8-10; Lutz Surrebuttal, pp. 2-11)

- c. Standby Rider – Should the Commission order changes to each utility’s Standby Rider tariff, as recommended by the Division of Energy?

Company position: The Commission should adopt the Standby service tariff proposed by the Company with no changes. (Lutz Direct – 0145, pp. 29-34; Lutz Direct – 0146, pp. 29-34; and Lutz Rate Design Rebuttal, pp. 12-13)

- VI. Indiana Model** – Should the Commission order each utility’s Demand Response Incentive Tariff be modified to incorporate the Indiana Model, as proposed by AEMA?

Company position: No, the Commission should take no further action in this case with respect to DER or the Indiana Model. (Winslow Supplemental Direct, pp. 1-14; Winslow Surrebuttal, pp. 1-4; Crawford Supplemental Direct, pp. 1-13; Crawford Surrebuttal, p. 6, and Lutz Rate Design Rebuttal, pp. 20-21)

VII. Third Party Charging Stations

- a. Electric Vehicle Make Ready Model – Should the Commission modify each utility’s line extension tariffs to subsidize installations of customer-owned separately metered charging equipment under specified circumstances?

Company position: No, the Commission should reject Staff’s proposed EV charging station make ready facility extension policy as unwarranted by the Commission order on which Staff relies (Case No. ER-2016-0285), unnecessary and requiring undue involvement of the Company in siting decisions of third parties. (Lutz Rate Design Rebuttal, pp. 13-20)

- b. EV Charging Separately Metered Rate – Should the Commission create an SGS subclass to facilitate time-differentiated separately-metered customer owned EV charging under specified circumstances?

Company position: No, the Commission should reject Staff’s proposed time-differentiated separately-metered customer owned EV charging rate schedules as unwarranted and overly complicated to administer. (Rush Direct – 0145, pp. 9-19;

Rush Direct - 0146, pp. 13-23; Rush Rebuttal, p. 8; and Rush Rate Design Rebuttal, pp. 7-11)

VIII. Distributed Energy Resources (“DERs”) Data - Should the Companies’ Net Metering Interconnection Agreement, Parallel Generation Contract Service (Cogeneration Purchase Schedule), and Standby Service Rider include language regarding maintaining and aggregating information related to customer generator systems?

Company position: The Commission should reject this recommendation as premature and allow the DER-related recommendations to be fully considered within the EW-2017-0245 case and the associated rulemaking. (Lutz Rate Design Rebuttal, pp. 20-21)

Respectfully submitted,

/s/ Robert J. Hack

Robert J. Hack, MBN 36496

Roger W. Steiner, MBN 39586

Kansas City Power & Light Company

1200 Main Street, 16th Floor

Kansas City, MO 64105

Telephone: (816) 556-2314

Facsimile: (816) 556-2787

E-Mail: Rob.Hack@kcpl.com

E-Mail: Roger.Steiner@kcpl.com

**Attorneys for Kansas City Power & Light
Company and KCP&L Greater Missouri
Operations Company**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties of record on this 19th day of September 2018.

/s/ Robert J. Hack

Robert J. Hack