

*Exhibit No.:*  
*Issue:* FAC Base Factor  
*Witness:* Catherine F. Lucia  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Corrected  
Surrebuttal and  
True-up Direct Testimony  
*Case No.:* ER-2018-0145  
*Date Testimony Prepared:* September 10, 2018

**MISSOURI PUBLIC SERVICE COMMISSION**

**COMMISSION STAFF DIVISION**

**ENERGY RESOURCES DEPARTMENT**

**CORRECTED**

**SURREBUTTAL AND TRUE-UP DIRECT TESTIMONY**

**OF**

**CATHERINE F. LUCIA**

**KANSAS CITY POWER & LIGHT COMPANY**

**CASE NO. ER-2018-0145**

*Jefferson City, Missouri*  
*September 2018*

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**CATHERINE F. LUCIA**

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1                                   **CORRECTED SURREBUTTAL AND**  
2                                   **TRUE-UP DIRECT TESTIMONY**

3                                   **OF**

4                                   **CATHERINE F. LUCIA**

5                                   **KANSAS CITY POWER & LIGHT COMPANY**

6                                   **CASE NO. ER-2018-0145**

7           Q.     Please state your name and business address.

8           A.     My name is Catherine Lucia and my business address is P.O. Box 360,  
9     200 Madison Street, Jefferson City, MO 65102.

10          Q.     By whom are you employed and in what capacity?

11          A.     I am a Utility Regulatory Auditor IV in the Energy Resources Department with  
12     the Missouri Public Service Commission (“Commission”).

13          Q.     Are you the same Catherine Lucia who has previously filed testimony in  
14     this case?

15          A.     Yes, I filed testimony in Staff’s Cost of Service (“COS”) Report, Staff’s  
16     Class Cost of Service Report (“CCOS”) Report, and Rebuttal Testimony filed in the  
17     Kansas City Power & Light Company (“KCPL”) and KCPL Greater Missouri Operations  
18     Company (“GMO”) rate cases designated as Case No. ER-2018-0145 and ER-2018-0146 on  
19     June 19, 2018, July 6, 2018, and August 7, 2018, respectively.

20          Q.     What is the purpose of your Surrebuttal and True-up Direct testimony?

21          A.     I will present Staff’s position on the inclusion of fuel costs for the Montrose  
22     Station, units 2 and 3, which is addressed in the rebuttal testimony of Office of the Public  
23     Counsel witnesses Lena Mantle and John A. Robinett, both filed July 27, 2018. I will present

1 Staff's current position for the voltage adjustment factors based on the surrebuttal testimony  
2 of Staff witness Alan J. Bax. I will present the true-up of Staff's fuel adjustment clause  
3 ("FAC") base factor as of the true-up date of June 30, 2018.

4 **MONTROSE STATION - UNITS 2 AND 3**

5 Q. In regard to Lena Mantle's and John A. Robinett's testimonies, as they relate to  
6 the inclusion of fuel costs for Montrose Station, units 2 and 3, what is Staff's response?

7 A. Staff's position is these units should be included in the fuel model because they  
8 are still in service and the expected retirement date of December 31, 2018, is outside of the  
9 test year, which ends June 30, 2017.

10 **VOLTAGE ADJUSTMENT FACTORS**

11 Q. Has Staff's position in regards to the voltage adjustment factors changed from  
12 Staff's Direct CCOS?

13 A. Yes, based on surrebuttal testimony of Staff witness Alan J. Bax and his  
14 review of the line loss study dated June 12, 2018. Staff supports the addition of a fourth  
15 voltage adjustment factor, substation to transmission voltage level customers (substation), to  
16 the existing three factors; transmission, primary, and secondary.

17 Q. Will these voltage adjustment factors impact the FAC?

18 A. Yes, these voltage adjustment factors are a component of the Fuel Adjustment  
19 Rate (FAR).

20 Q. Will the change in voltage adjustment factors impact the base factor?

21 A. No.

1     **TRUE-UP BASE FACTOR**

2           Q.     What is Staff's true-up base factor?

3           A.     Staff's true-up base factor, as of June 30, 2018, for the KCPL FAC is  
4     \$0.01675.

5           Q.     Is this the same base factor provided in the CCOS Report?

6           A.     No, it has been adjusted based on the inclusion of costs for dust control and  
7     freeze protections found in FERC Account 501000, a correction of an amount shown for  
8     FERC Account 509000, which reflected Missouri jurisdictional rather than total company,  
9     and an updated fuel run which changed the Net System Input ("NSI") and the pass-through  
10    SPP transmission cost percentage.

11          Q.     Does that conclude your testimony?

12          A.     Yes.

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of Kansas City Power & )  
Light Company's Request for Authority ) Case No. ER-2018-0145  
to Implement a General Rate Increase for )  
Electric Service )

**AFFIDAVIT OF CATHERINE F. LUCIA**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

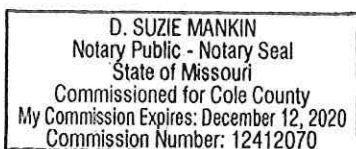
COMES NOW CATHERINE F. LUCIA and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Corrected Surrebuttal and True-Up Direct Testimony* and that the same is true and correct according to her best knowledge and belief.

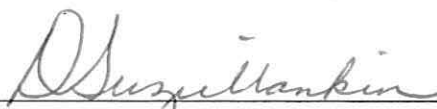
Further the Affiant sayeth not.

  
\_\_\_\_\_  
CATHERINE F. LUCIA

**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 10<sup>th</sup> day of September 2018.



  
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Notary Public