

Exhibit No.:
Issue: Indiana Model
Witness: Kimberly H. Winslow
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

KIMBERLY H. WINSLOW

ON BEHALF OF

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

**Kansas City, Missouri
September 2018**

SURREBUTTAL TESTIMONY

OF

KIMBERLY H. WINSLOW

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

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

2 A. My name is Kimberly H. Winslow. My business address is 1200 Main Street, Kansas
3 City, Missouri 64105.

4 **Q. On whose behalf are you testifying?**

5 A. I am testifying on behalf of Kansas City Power & Light Company (“KCP&L”) and
6 KCP&L Greater Missouri Operations Company (“GMO”) (collectively, the
7 “Company”).

8 **Q: Are you the same Kimberly H. Winslow who filed Direct, Supplemental Direct**
9 **and Rebuttal Testimony in both ER-2018-0145 and ER-2018-0146?**

10 A: Yes, I am.

11 **Q. What is the purpose of your testimony?**

12 A: I will be responding to Renew Missouri witness James Owen’s testimony regarding the
13 Company’s intention to file demand response programs and related Indiana Model-like
14 tariffs within its MEEIA Cycle 3 filing.

15 **Q. What concerns does Mr. Owen outline in his rebuttal testimony?**

16 A. Mr. Owen takes exception to the Company deferring detail of its planned demand
17 response programs to be shared in our MEEIA Cycle 3 filing. His preference would
18 be for the Company to offer those programs within this rate case.

1 **Q. How has the Company historically offered demand response programs?**

2 A. As discussed in my supplemental direct testimony, the Company has a strong history
3 of offering demand response programs, both with residential and commercial
4 customers. The Company first began offering demand response programs as part of its
5 Comprehensive Energy Plan, circa 2005. It has since included robust demand response
6 programs in its MEEIA Cycle 1 and 2 filings and will include such programs in its
7 upcoming MEEIA Cycle 3 filing. Contrary to Mr. Owen’s assertion, the Company has
8 every intention of offering demand response programs in its MEEIA Cycle 3 filing,
9 scheduled in September, and will build on those programs as included within its
10 Integrated Resource Plan (“IRP”) filing and 2016 potential study.

11 It is important that the Company continue to align its integrated resource plans
12 and the offering of demand side management (“DSM”) programs within its MEEIA
13 filings. Mr. Owen’s concerns are unfounded as he fails to consider additional
14 Commission oversight regarding DSM, which is outside of voluntary MEEIA. As
15 provided in 4 CSR 240-22.080, any changes to the Company’s preferred resource plan
16 must be shared with parties within 60 days. DSM is a major component of the
17 Company’s recent triennial filing.

18 The Missouri Statutes and Rules lay out an orderly process for identifying,
19 quantifying, prioritizing DSM programs that will be funded by customers. The
20 Company’s forthcoming application for MEEIA Cycle 3 programs has followed this
21 process. The DSM Potential Study, completed in 2016, identified, screened and
22 quantified the realistically achievable DSM potential of a number of measures. The
23 IRP process evaluated numerous resource scenarios and the IRPs filed for KCP&L and
24 GMO identified a preferred resource plan that included a desired level of DSM

1 implementation to meet future resource needs. The MEEIA Cycle 3 program is being
2 developed to provide the level of DSM programs outlined by the IRP. If the Company
3 were to stray from its DSM commitment, there is oversight contained within the IRP
4 rules that requires the Company to notify the Commission.

5 **Q. Mr. Owen expresses concern that the recent merger may change the priorities of**
6 **the Company and past efforts may not be indicative of future efforts regarding**
7 **MEEIA. Are his concerns warranted?**

8 A. No. On May 20, 2018, the Company filed a notice of intention to file its MEEIA Cycle
9 3 programs for its KCP&L-MO and GMO jurisdictions. In addition, we communicate
10 quarterly with stakeholders through our Demand Side Management Advisory Group
11 (“DSMAG”), in which Renew Missouri participates, progress on our current cycle as
12 well as the timing and details of our MEEIA Cycle 3 filing. In our June 14, 2018
13 DSMAG meeting we did communicate with parties that the timing of our filing would
14 be adjusted, likely to August/September timeframe. The Company has had great
15 success in the offering of its MEEIA programs and values the positive impact of these
16 programs, both with helping our customers to save energy as well as deferring supply
17 side resources.

18 **Q. How did the Commission’s Order on May 4, 2018 direct the Company to address**
19 **the “Indiana Model”?**

20 A. As stated on Page 3, Lines 2-8 of Mr. Owen’s testimony, the Commission’s Order
21 allows the Company to explain whether those issues (related to the Indiana Model)
22 should be addressed in our rate cases or in MEEIA Cycle 3. Compliant with the
23 Commission’s order and as provided in my testimony, we will further address an

1 Indiana Model-like tariff in our MEEIA Cycle 3 as an enhancement to our Demand
2 Response Incentive program.

3 **Q. Does Mr. Owen acknowledge that the Company was in compliance with the**
4 **Commission’s order regarding this?**

5 A. Yes, he did acknowledge that Mr. Burton Crawford and I provided testimony in
6 compliance with the order. However, he attempts to discredit the Company by stating
7 that the Company may not follow through with our intentions. This conclusion is based
8 on his own misapprehensions, and is not well founded, or reflective of the Company’s
9 testimony.

10 Mr. Owen further requests the Commission make the issue of allowing for
11 aggregation a separate order so that the utilities make demand response implementation
12 and energy efficiency a priority. He correctly states in his testimony that MEEIA is a
13 voluntary undertaking by the utilities but his concerns do not warrant a workshop given
14 the direction provided by the Commission to address within MEEIA.

15 **Q. Does this conclude your testimony?**

16 A. Yes, it does.

