

Exhibit No.:
Issues: *Fuel Adjustment Clause,*
Witness: *Brooke Mastrogiannis*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *True-up Direct*
Surrebuttal Testimony
Case Nos.: *ER-2018-0146*
Date Testimony Prepared: *September 4, 2018*

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

ENERGY RESOURCES DEPARTMENT

SURREBUTTAL/TRUE-UP DIRECT TESTIMONY

OF

BROOKE MASTROGIANNIS

KCP&L GREATER MISSOURI OPERATIONS

CASE NO. ER-2018-0146

Jefferson City, Missouri
September 2018

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KCP&L GREATER MISSOURI OPERATIONS
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1 **SURREBUTTAL/TRUE-UP DIRECT AND TESTIMONY OF**
2 **BROOKE MASTROGIANNIS**
3 **KCP&L GREATER MISSOURI OPERATIONS**
4 **CASE NO. ER-2018-0146**

5 Q. Please state your name, employment position, and business address.

6 A. Brooke Mastrogiannis, Utility Regulatory Auditor with the Missouri Public
7 Service Commission (“Commission” or “PSC”), 200 Madison Street, Jefferson City, Missouri
8 65101.

9 Q. Are you the same Brooke Mastrogiannis who has previously provided
10 testimony in this case?

11 A. Yes. I previously provided testimony as Brooke Richter, and have since
12 changed my maiden name to my new married name, Mastrogiannis. I contributed to Staff’s
13 Cost of Service (“COS”) Report filed in the Kansas City Power & Light Company (“KCPL”)
14 and KCP&L Greater Missouri Operations Company (“GMO”) rate cases designated as
15 Case No. ER-2018-0145 and Case No. ER-2018-0146, respectively, on June 19, 2018. I also
16 contributed to Staff’s Class Cost of Service (“CCOS”) Report filed on July 6, 2018. Finally, I
17 filed rebuttal COS testimony on July 27, 2018, and rebuttal CCOS testimony on
18 August 7, 2018.

19 Q. What is the purpose of your surrebuttal and true-up direct testimony?

20 A. I will discuss a true-up of Staff’s fuel adjustment clause (“FAC”) base factor as
21 of the true-up date of June 30, 2018. I will also respond to OPC witness Lena M. Mantle’s
22 rebuttal testimony filed on July 27, 2018, in which she states Staff does not consider the
23 retirement of Sibley Units 2 and 3 for GMO. Lastly, I will explain the impact of Staff’s

1 position change, in the surrebuttal testimony of Staff witness Alan Bax, on the voltage
2 adjustment factors.

3 **True-up Direct**

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

5 A. Staff's true-up base factor for the GMO FAC is \$0.02240.¹ This true-up base
6 factor represents an updated fuel model which changed the Net System Input ("NSI"), the
7 pass-through SPP transmission cost percentage, and the true-up adjustments also reflected in
8 Staff's revenue requirement.

9 **Surrebuttal**

10 **Fuel Adjustment Clause**

11 Q. In regard to Ms. Mantle's rebuttal testimony stating that Staff included
12 generating plants, Sibley units 2 and 3, in fuel costs, what is Staff's response?

13 A. I understand that Staff includes generating plants Sibley units 2 and 3 in its
14 GMO fuel model because they are still in service and have expected retirement dates outside
15 of the test year.

16 **Voltage Adjustment Factors**

17 Q. Has Staff's position changed in regard to the addition of an expansion factor
18 for substation to transmission and an expansion factor for transmission voltage level
19 customers for GMO that was stated in Staff's Rebuttal CCOS?²

20 A. Yes.

¹ Staff's calculation of the Base Factor is included in the attached Confidential Revised Schedule CCOS-3.

² Staff's Rebuttal CCOS, witness Brooke Richter, page 4, filed August 7, 2018.

1 Q. Has Staff's position regarding GMO's new line loss study changed from that
2 stated in Staff's Direct CCOS?³

3 A. Yes. Staff witness Alan J. Bax discusses in his surrebuttal testimony his latest
4 review of the line loss study that was provided June 12, 2018.

5 Q. How will the change in Staff's position of the voltage adjustment factors
6 impact the FAC?

7 A. The voltage adjustment factors adjust for the energy losses experienced in the
8 delivery of electricity from the generator to customers being served at the primary, secondary,
9 and proposed substation to transmission and transmission voltage levels. This change does
10 not affect the base factor, however these factors will be utilized going forward in Staff's
11 determination of a Fuel Adjustment Rate (FAR).

12 Q. Does that conclude your surrebuttal and true-up direct testimony?

13 A. Yes.

14

³ Staff's Rebuttal CCOS, witness Brooke Richter page 62 and 63, and witness Alan Bax page 59 and 60, filed July 6, 2018.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

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

AFFIDAVIT OF BROOKE MASTROGIANNIS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

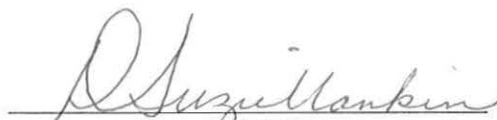
COMES NOW BROOKE MASTROGIANNIS and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal and True-Up Direct Testimony* and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.


BROOKE MASTROGIANNIS

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 30th day of August 2018.


Notary Public

