

Exhibit No.:
Issue: Customer Program
Witness: Robin Kliethermes
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: GU-2020-0376
Date Testimony Prepared: September 15, 2020

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

REBUTTAL TESTIMONY

OF

ROBIN KLIETHERMES

**SPIRE MISSOURI INC.,
d/b/a SPIRE**

CASE NO. GU-2020-0376

*Jefferson City, Missouri
September 2020*

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **ROBIN KLIETHERMES**

4 **SPIRE MISSOURI, INC.,**
5 **d/b/a Spire**

6 **CASE NO. GU-2020-0376**

7 Q. Please state your name and business address.

8 A. My name is Robin Kliethermes. My business address is P.O. Box 360, Suite 700,
9 Jefferson City, MO 65102.

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

11 A. I am the Regulatory Compliance Manager of the Tariff and Rate Design
12 Department in the Industry Analysis Division for the Missouri Public Service Commission
13 (“Commission”).

14 Q. Please describe your educational background and work experience.

15 A. A description of my education background, work experience and list of case
16 participation is attached as Schedule RK-r1.

17 **EXECUTIVE SUMMARY**

18 Q. What is the purpose of your testimony?

19 A. The purpose of my testimony is to support the Amended Unanimous Stipulation
20 and Agreement (“Unanimous Stipulation”) filed on September 15, 2020 in this proceeding.
21 Specifically, my testimony will address the COVID-19 Customer Arrearage Payment Plan
22 component of the Stipulation.

23 Q. Are other members of Staff also submitting rebuttal testimony in this
24 proceeding?

25 A. Yes. Staff witness Kimberly K. Bolin is submitting testimony as well.

1 **CUSTOMER ARREARAGE PAYMENT PLAN**

2 Q. Does the Unanimous Stipulation include a customer arrearage payment plan?

3 A. Yes. The payment plan consists of a \$100 credit assigned to each customer upon
4 enrollment. Customers will also have the next \$300 in arrearage matched over the duration of
5 the program for a total of \$400 available per customer account. The payment plan is available
6 to customers in arrears on their natural gas bills and have lost their job(s), lost income or been
7 furloughed since March 1, 2020.

8 Q. Does Spire Missouri Inc., d/b/a Spire (“Spire East” and “Spire West”) currently
9 have an arrearage payment plan in its currently effectively tariffs?

10 A. Yes. The Low-Income Energy Affordability Program was established in
11 the Spire East’s and Spire West’s last general rate cases, Case Nos. GR-2017-0215 and
12 GR-2017-0216. The Low-Income Energy Affordability Program consists of two parts: a fixed
13 charge assistance program and an arrearage payment plan for eligible customers.

14 Q. Can a customer be enrolled in both the Customer Arrearage Payment Plan and
15 the Low-Income Energy Affordability Program?

16 A. Yes. Staff understands that customers can be enrolled in both programs, if the
17 customer meets the eligibility requirements of each program. Further, Staff understands that
18 the combination of bill credits will not result in a negative bill for customers enrolled in
19 the programs.

20 Q. Has a tariff been designed for the Customer Arrearage Payment Plan mentioned
21 in the Amended Unanimous Stipulation and Agreement?

Rebuttal Testimony of
Robin Kliethermes

1 A. At this time a tariff has not been designed; however, Staff understands that upon
2 Commission approval of the Unanimous Stipulation, a tariff will be filed. Once filed, the tariff
3 will be subject to review and Commission approval.

4 Q. Does this conclude your testimony?

5 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Spire Missouri Inc.'s)
d/b/a Spire Verified Application for an)
Accounting Authority Order Related to)
COVID-19 Impacts) Case No. GU-2020-0376

AFFIDAVIT OF ROBIN KLIETHERMES

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COME NOW ROBIN KLIETHERMES and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Robin Kliethermes*; and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

Further the Affiants sayeth not.

/s/ Robin Kliethermes
_____)
ROBIN KLIETHERMES

Robin Kliethermes

Present Position:

I am the Regulatory Compliance Manager of the Tariff and Rate Design Department, Industry Analysis Division, of the Missouri Public Service Commission ("Commission"). I have held this position since July 16th, 2016. I have been employed by the Commission since March of 2012. In May of 2013, I presented on Class Cost of Service and Cost Allocation to the National Agency for Energy Regulation of Moldova ("ANRE") as part of the National Association of Regulatory Utility Commissioners ("NARUC") Energy Regulatory Partnership Program. I am also a member of the Electric Meter Variance Committee.

Educational Background and Work Experience:

I have a Bachelor of Science degree in Parks, Recreation and Tourism with a minor in Agricultural Economics from the University of Missouri – Columbia in 2008, and a Master of Science degree in Agricultural Economics from the same institution in 2010. Prior to joining the Commission, I was employed by the University of Missouri Extension as a 4-H Youth Development Specialist and County Program Director in Gasconade County.

Additionally, I completed two online classes through Bismarck State College: Energy Markets and Structures (ENRG 420) in December, 2014 and Energy Economics and Finance (ENRG 412) in May, 2015.

Previous Testimony of Robin Kliethermes

Case No.	Company	Type of Filing	Issue
ER-2012-0166	Ameren Missouri	Staff Report	Economic Considerations
ER-2012-0174	Kansas City Power & Light Company	Staff Report	Economic Considerations
ER-2012-0175	KCP&L Greater Missouri Operations Company	Staff Report	Economic Considerations & Large Power Revenues
ER-2012-0345	Empire District Electric Company	Staff Report	Economic Considerations, Non-Weather Sensitive Classes & Energy Efficiency
HR-2014-0066	Veolia Kansas City	Staff Report	Revenue by Class and Class Cost of Service
GR-2014-0086	Summit Natural Gas	Staff Report	Large Customer Revenues
GR-2014-0086	Summit Natural Gas	Rebuttal	Large Customer Revenues
EC-2014-0316	City of O'Fallon Missouri and City of Ballwin, Missouri v. Union Electric Company d/b/a Ameren Missouri	Staff Memorandum	Overview of Case
EO-2014-0151	KCP&L Greater Missouri Operations Company	Staff Recommendation	Renewable Energy Standard Rate Adjustment Mechanism (RESRAM)
ER-2014-0258	Ameren Missouri	Staff Report	Rate Revenue by Class, Class Cost of Service study, Residential Customer Charge
ER-2014-0258	Ameren Missouri	Rebuttal	Weather normalization adjustment to class billing units
ER-2014-0258	Ameren Missouri	Surrebuttal	Residential Customer Charge and Class allocations
ER-2014-0351	Empire District Electric Company	Staff Report	Rate Revenue by Class, Class Cost of Service study, Residential Customer Charge
ER-2014-0351	Empire District Electric Company	Rebuttal & Surrebuttal	Residential Customer, Interruptible Customers

cont'd Previous Testimony of
Robin Kliethermes

Case No.	Company	Type of Filing	Issue
ER-2014-0370	Kansas City Power & Light Company	Staff Report	Rate Revenue by Class, Class Cost of Service study, Residential Customer Charge
ER-2014-0370	Kansas City Power & Light Company	Rebuttal & Surrebuttal	Class Cost of Service, Rate Design, Residential Customer Charge
ER-2014-0370	Kansas City Power & Light Company	True-Up Direct & True-Up Rebuttal	Customer Growth & Rate Switching
EE-2015-0177	Kansas City Power & Light Company	Staff Recommendation	Electric Meter Variance Request
EE-2016-0090	Ameren Missouri	Staff Recommendation	Tariff Variance Request
EO-2016-0100	KCP&L Greater Missouri Operations Company	Staff Recommendation	RESRAM Annual Rate Adjustment Filing
ET-2016-0185	Kansas City Power & Light Company	Staff Recommendation	Solar Rebate Tariff Change
ER-2016-0023	Empire District Electric Company	Staff Report	Rate Revenue by Class, CCOS and Residential Customer Charge
ER-2016-0023	Empire District Electric Company	Rebuttal & Surrebuttal	Residential Customer Charge and CCOS
ER-2016-0156	KCP&L Greater Missouri Operations	Staff Report	Rate Revenue by Class, CCOS and Residential Customer Charge
ER-2016-0156	KCP&L Greater Missouri Operations	Rebuttal & Surrebuttal	Data Availability, Energy Efficiency Revenue Adj., Residential Customer Charge
ER-2016-0179	Ameren Missouri	Rebuttal	Blocked Usage
ER-2016-0285	Kansas City Power & Light Company	Rebuttal & Surrebuttal	Clean Charge Network Tariff, Rate Design
GR-2017-0215	Spire (Laclede Gas Company)	Staff Report, Rebuttal & Surrebuttal	Tariff Issues, Rate Design and Class Cost of Service
GR-2017-0216	Spire (Missouri Gas Energy)	Staff Report, Rebuttal & Surrebuttal	Tariff Issues, Rate Design and Class Cost of Service

cont'd Previous Testimony of
Robin Kliethermes

Case No.	Company	Type of Filing	Issue
EC-2018-0103	Kansas City Power & Light	Staff Report	Customer Complaint
EO-2015-0055	Ameren Missouri	Rebuttal	Flex-Pay Program
GR-2018-0013	Liberty	Staff Report	Class Cost of Service and Rate Design Report
ER-2018-0145	Kansas City Power & Light	Staff Report & Rebuttal & Surrebuttal	Tariff Issues, Rate Design, Revenue, Class Cost of Service
ER-2018-0146	KCP&L Greater Missouri Operations	Staff Report & Rebuttal & Surrebuttal	Tariff Issues, Rate Design, Revenue, Class Cost of Service
EO-2018-0211	Ameren Missouri	Staff Rebuttal Report	MEEIA Margin Rates
GO-2019-0059	Spire Missouri West	Staff Recommendation & Rebuttal	Weather Normalization Adjustment Rider (WNAR)
GO-2019-0058	Spire Missouri East	Staff Recommendation & Rebuttal	Weather Normalization Adjustment Rider (WNAR)
ET-2018-0132	Ameren Missouri	Surrebuttal	Risk Sharing Mechanism
ER-2019-0291	Ameren Missouri	Staff Recommendation	MEEIA EEIC rates
GR-2019-0077	Ameren Missouri	Staff Report, Rebuttal & Surrebuttal	Tariff Issues, Rate Design, Revenue, Class Cost of Service
EO-2019-0132	KCPL and GMO	Staff Rebuttal Report	MEEIA DSIM mechanism, Tariff Issues
ER-2019-0335	Ameren Missouri	Staff Report, Rebuttal and Surrebuttal	Cost of Service and Class Cost of Service
ER-2019-0374	Empire District Electric Company	Staff Report, Rebuttal and Surrebuttal	Class Cost of Service and Estimated Bills
ER-2019-0374	Empire District Electric Company	Supplemental and Surrebuttal Supplemental	Estimated Bills and Billing Determinants
EU-2020-0350	Evergy	Rebuttal	Lost Revenue Calculation