

Exhibit No.:
Issues: FAC Base Factor
Witness: Catherine F. Lucia
Sponsoring Party: MoPSC Staff
Type of Exhibit: True-up Direct
Surrebuttal Testimony
Case Nos.: ER-2018-0145
Date Testimony Prepared: September 4, 2018

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

ENERGY RESOURCES DEPARTMENT

SURREBUTTAL/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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SURREBUTTAL AND TRUE-UP DIRECT TESTIMONY
OF
CATHERINE F. LUCIA
KANSAS CITY POWER & LIGHT COMPANY
CASE NO. ER-2018-0145**

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

2 **OF**

3 **CATHERINE F. LUCIA**

4 **KANSAS CITY POWER & LIGHT COMPANY**

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

6 Q. Please state your name and business address.

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

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

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

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

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

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

22 A. I will present Staff’s position on the inclusion of fuel costs for the
23 Montrose Station, units 2 and 3, which is addressed in the rebuttal testimony of

1 Office of Public Counsel witnesses Lena Mantle and John Robinett, both filed
2 July 27, 2018. I will present Staff's current position for the voltage adjustment
3 factors based on the surrebuttal testimony of Staff witness Alan Bax. I will
4 present the true-up of Staff's fuel adjustment clause ("FAC") base factor as of the
5 true-up date of June 30, 2018.

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

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

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

13

14 **VOLTAGE ADJUSTMENT FACTORS**

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

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

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

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

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

5 A. No.

6 **TRUE-UP BASE FACTOR**

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

8 A. Staff's true-up base factor, as of June 30, 2018, for the KCPL FAC
9 is \$0.01679

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

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

17 Q. Does that conclude your true-up direct testimony?

18 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 *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 30th day of August 2018.



Notary Public

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070