

Exhibit No.:
Issues: LED Street Lighting
Witness: Hojong Kang
Sponsoring Party: MO PSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: ER-2012-0345
Date Testimony Prepared: January 16, 2013

MISSOURI PUBLIC SERVICE COMMISSION

REGULATORY REVIEW DIVISION

REBUTTAL TESTIMONY

OF

HOJONG KANG

THE EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2012-0345

*Jefferson City, Missouri
January 2013*

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

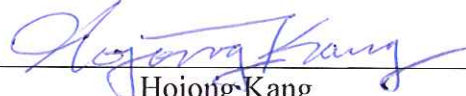
In the Matter of The Empire District)
Electric Company of Joplin, Missouri)
Tariffs Increasing Rates for Electric)
Service Provided to Customers in the)
Missouri Service Area of the Company)

Case No. ER-2012-0345

AFFIDAVIT OF HOJONG KANG

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

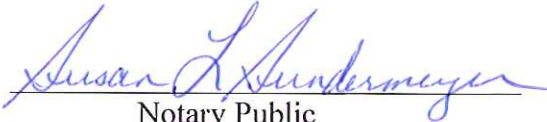
Hojong Kang, of lawful age, on his oath states: that he has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of 3 pages of Rebuttal Testimony to be presented in the above case, that the answers in the following Rebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.



Hojong Kang

Subscribed and sworn to before me this 15th day of January, 2013.





Notary Public

REBUTTAL TESTIMONY

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THE EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2012-0345

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11 Q. Please state your name and business address.

12 A. My name is Hojong Kang, and my business address is Missouri Public Service
13 Commission, P. O. Box 360, Jefferson City, Missouri 65102.

14 Q. What is your present position at the Missouri Public Service Commission?

15 A. I am a Regulatory Economist in the Energy Rate Design and Tariffs Unit of the
16 Regulatory Review Division.

17 Q. Are you the same Hojong Kang that contributed to Staff's Revenue
18 Requirement Cost-of-Service Report ("COS") filed on November 30, 2012?

19 A. Yes, I am.

20 Q. Would you please summarize the purpose of your rebuttal testimony?

21 A. I provide clarification to my testimony in the COS concerning Light Emitting
22 Diode ("LED") street and area ("SAL") lighting.

23 Q. Does this rebuttal testimony correct anything in your COS testimony?

24 A. No. My testimony in the COS is factually correct.

25 Q. What clarification would you like to make?

26 A. On July 6, 2012, the Company's witness, Martin O. Penning, filed direct
27 testimony in this case in which Mr. Penning provided an update on Empire's LED pilot study
28 and discussed plans for possibly filing future tariff sheets. However, Mr. Penning's update

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1 was filed twenty-one (21) days late, since paragraph 10 of the *Global Agreement* in Case No.
2 ER-2011-0004 required that Empire file an update on an LED pilot study and plans for filing
3 future tariff sheets by June 15, 2012 – one year from the effective date of rates as a result of
4 Case No. ER-2011-0004.

5 Q. How does Empire propose to proceed with an LED pilot study and file LED
6 lighting tariff sheets?

7 A. Empire will continue to have frequent conversations with Kansas City Power
8 & Light (“KCPL”) concerning its LED lighting program and will continue to meet with the
9 Staff of the Commission on this issue. KCPL is participating in a LED pilot program with the
10 Mid-America Regional Council (“MARC”), participating communities, and joint partners
11 KCP&L Greater Missouri Operations Company, Westar Energy, Inc., and Platte-Clay Electric
12 Cooperative to review and evaluate the costs and benefits of the LED SAL systems. A final
13 evaluation report for this pilot program is not expected until late 2013.¹ Empire will continue
14 to monitor KCPL’s LED pilot program instead of implementing a small Empire LED pilot
15 program.

16 Q. Does Staff have a recommendation for the Commission regarding Empire’s
17 response to the Commission’s Order regarding LED street lighting?

18 A. Staff recommends that the Commission’s Report and Order in this case order
19 Empire to complete its own evaluation of LED SAL systems and file either a proposed LED
20 lighting tariff sheet(s), or an update to the Commission on when it will file a proposed LED
21 lighting tariff sheet(s) with or without completion of its own independent pilot program of

¹ KCPL P.S.C. MO. No. 7, Sheet Nos. 48, 49 and 50.

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1 LED SAL systems,² no later than twelve (12) months following the Commission's Report and
2 Order.

3 Q. Does this conclude your rebuttal testimony?

4 A. Yes, it does.

² Currently, there is some accessible information from other municipalities or utilities. Also, one can access information from various Department of Energy (DOE) websites at <http://www1.eere.energy.gov/buildings/ssl/resources.html>