

Exhibit No.:
Issue: Demand Side Investment Mechanism
Rider
Witness: Tim M. Rush
Type of Exhibit: Direct Testimony
Sponsoring Party: Kansas City Power & Light Company
Case No.: ER-2019-0165
Date Testimony Prepared: November 30, 2018

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2019-0165

DIRECT TESTIMONY

OF

TIM M. RUSH

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

**Kansas City, Missouri
November 2018**

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


In the Matter of Kansas City Power & Light)
Company's Demand Side Investment)
Mechanism Rider Rate Adjustment and True-Up)
Required by 4 CSR 240-20.093(4))
Case No. ER-2019- 0165

AFFIDAVIT OF TIM RUSH

STATE OF MISSOURI)
)
COUNTY OF JACKSON)
)
)
) ss

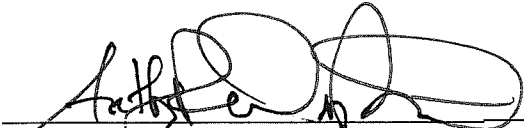
Tim M. Rush, being first duly sworn on his oath, states:

- 1. My name is Tim M. Rush. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Director, Regulatory Affairs.
- 2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Kansas City Power & Light Company consisting of seven (7) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.
- 3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.



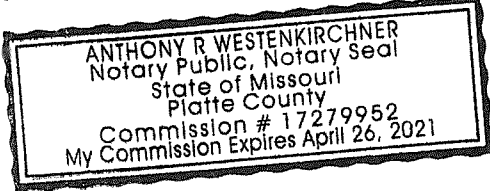
Tim M. Rush

Subscribed and sworn before me this 29th day of November 2018.



Notary Public

My commission expires: 4/26/2021



DIRECT TESTIMONY

OF

TIM M. RUSH

Case No. ER-2019- 0165

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

2 A: My name is Tim M. Rush. My business address is 1200 Main Street, Kansas City,
3 Missouri 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Kansas City Power & Light Company (“KCP&L” or “Company”) as
6 Director, Regulatory Affairs.

7 **Q: What are your responsibilities?**

8 A: My general responsibilities include overseeing the preparation of rate cases, class cost of
9 service (“CCOS”) and rate design for both KCP&L and KCP&L Greater Missouri
10 Operations Company (“GMO”). I am also responsible for overseeing the regulatory
11 reporting and general activities as they relate to the Missouri Public Service Commission
12 (“MPSC” or “Commission”), including Missouri Energy Efficiency Investment Act
13 (“MEEIA”) filings.

14 **Q: Please describe your education, experience and employment history.**

15 A: I received a Master of Business Administration degree from Northwest Missouri State
16 University in Maryville, Missouri. I did my undergraduate study at both the University
17 of Kansas in Lawrence and the University of Missouri in Columbia. I received a
18 Bachelor of Science degree in Business Administration with a concentration in
19 Accounting from the University of Missouri in Columbia.

1 **Q: Please provide your work experience.**

2 A: I was hired by KCP&L in 2001 as the Director, Regulatory Affairs. Prior to my
3 employment with KCP&L, I was employed by St. Joseph Light & Power Company
4 (“Light & Power”) for over 24 years. At Light & Power, I was Manager of Customer
5 Operations from 1996 to 2001, where I had responsibility for the regulatory area, as well
6 as marketing, energy consultant and customer services area. Customer services included
7 the call center and collections areas. Prior to that, I held various positions in the Rates
8 and Market Research Department from 1977 until 1996. I was the Manager of that
9 department for 15 years.

10 **Q: Have you previously testified in a proceeding before the MPSC?**

11 A: I have testified on many occasions before the MPSC on a variety of issues affecting
12 regulated public utilities.

13 **Q: What is the purpose of your testimony?**

14 A: The purpose of my testimony is to support the rate schedule filed by KCP&L to adjust the
15 Demand Side Investment Mechanism (“DSIM”) Rider. My testimony will explain the
16 change to the DSIM components based upon actual performance in the six-month period
17 ending October 2018, as well as, forecasted performance through June 2019 for Program
18 Costs and Throughput Disincentive (“TD”). The proposed change will result in a
19 decrease to a residential customer’s rate from \$0.00424 to \$0.00017 per kWh. The
20 proposed non-residential rate would decrease from \$0.00313 to \$0.00274 per kWh.

1 **Q: What are the MEEIA rule requirements for adjustments of DSIM rates?**

2 A: The requirements for adjustment of DSIM rates are found in Commission rules 4 CSR
3 240-20.093(4). In summary, the requirements outline that the update filing include
4 applicable DSIM rate tariff sheets, supporting testimony, and inclusion of the following:

5 A) Amount of revenue that was over-collected or under-collected through the most
6 recent recovery period by rate class.

7 B) Proposed adjustments or refunds by rate class.

8 C) Electric utility's short term borrowing rate.

9 D) Proposed adjustments to the current DSIM rates.

10 E) Complete documentation for the proposed adjustments to the current DSIM rates.

11 F) Any additional information the Commission ordered to be provided.

12 G) Annual report as required by 4 CSR 240-20.093(9).

13 As part of my Direct Testimony, I have included the information required for update of
14 the DSIM rate in the attached Schedules TMR-1 and TMR-2. In addition, KCP&L's
15 2017 Demand-Side Program Annual Report for MEEIA Cycle 1, referenced in Item G
16 above, was filed on March 28, 2018 in Case No. EO-2018-0260 and KCP&L's 2018
17 Demand-Side Program Annual Report for MEEIA Cycle 2, referenced in Item G above,
18 was filed on June 29, 2018 in Case No. EO-2018-0405.

19 **Q: Are you sponsoring this information?**

20 A: Yes, I am.

21 **Q: Please explain why KCP&L has filed an adjusted DSIM rate schedule at this time?**

22 A: The Commission's rule governing DSIM filings and submission requirements for electric
23 utilities specifically 4 CSR 240-20.093(4) requires KCP&L to make at least annual

1 adjustments of DSIM rates that reflect the amount of revenue that has been over/under
2 collected. KCP&L will continue to file semi-annual rate adjustments. Based upon actual
3 and estimated performance during the six-month time period(s), DSIM rates may be
4 adjusted up or down.

5 **Q: How did you develop the various DSIM rate components that make up the proposed**
6 **DSIM rate?**

7 A: As the DSIM tariff describes, the DSIM rate components consist of projected Program
8 Costs and projected TD associated with Cycle 2 for November 2018 through June 2019
9 and the reconciliation of actual and expected Program Costs and actual and expected
10 TD/TD-NSB for both Cycles 1 and 2 through October 2018. The performance incentive
11 from Cycle 1 was included for recovery over an eighteen-month period ending July 2018.
12 So, the performance incentive is reflected in the DSIM rate in this filing only as it relates
13 to certain under-recovered balances. These amounts are divided by the projected retail
14 sales, excluding opt-out sales from customers, for February 2019 through July 2019, to
15 develop a rate to be used in the DSIM rate. All of this is separately distinguished
16 between Residential and Non-Residential classes.

17 **Q: Please describe the impact of the change in costs and how it will affect KCP&L**
18 **customers.**

19 A: At this time, based on actual performance experienced through October 2018 and
20 forecasts through June 2019, the proposed residential DSIM rate will be lower than the
21 current rate of \$0.00424 per kWh and will become \$0.00017 per kWh. For a residential
22 customer using 1,000 kWh's, this would mean a decrease of \$4.07 per month. The
23 proposed DSIM rate will also decrease for the non-residential class from \$0.00313 per

1 kWh to \$0.00274 per kWh. For a non-residential customer using 1,000 kWh's, this would
2 mean a decrease of \$0.39. This decrease is primarily the result of a decrease in program
3 costs due to the scheduled expiration of MEEIA Cycle 2 programs effective March 31,
4 2019 with the exception of certain long-lead projects which may be extended through
5 March 31, 2020.

6 **Q: If the rate schedule filed by KCP&L is approved, what safeguards exist to ensure**
7 **that the revenues the Company bills to its customers do not exceed actual DSM**
8 **Program Costs, TD/TD-NSB incurred, as well as the earnings opportunity or**
9 **performance incentive?**

10 A: KCP&L's DSIM Rider mechanism and the Commission's rules provide two mechanisms
11 to ensure that amounts billed to customers do not exceed KCP&L's actual, prudently
12 incurred DSM Program Costs, TD/TD-NSB and earnings opportunity or performance
13 incentive. First, at the end of each recovery period, the Company is required to true up
14 amounts billed to customers through the DSIM Rider based upon Program Cost and
15 TD/TD-NSB actually incurred during that six-month period. Per MEEIA rule 4 CSR
16 240-20.093(4), these adjustments will be supported by complete documentation and
17 workpapers that demonstrate the need for DSIM rate adjustment. All proposed
18 adjustments and supporting documentation is subject to review by MPSC Staff and all
19 MEEIA stakeholders. Second, per MEEIA rule 4 CSR 240-20.093(11), KCP&L's DSIM
20 is subject to periodic prudence reviews by MPSC Staff to ensure that only prudently
21 incurred Program Costs and TD/TD-NSB are billed to customers through KCP&L's
22 DSIM. These two mechanisms serve as checks to ensure that the Company's customers

1 pay only the prudently incurred, actual Program Costs and TD/TD-NSB resulting from
2 implementation of MEEIA DSM programs.

3 **Q: Has KCP&L been subject to any prudence reviews by MPSC Staff?**

4 A: Yes, KCP&L has been through three prudence reviews. Most recently, in the third
5 prudence review initiated by Staff on June 4, 2018 in Case No. EO-2018-0363, Staff has
6 recommended a disallowance and has requested the Commission to order an adjustment
7 of \$48,481 including interest to be returned to KCP&L's customers for certain
8 entertainment/general expenses and promotional giveaway expenses. The Company has
9 requested a hearing on the matter, and as such, KCP&L has not included this adjustment
10 in this DSIM filing.

11 In the first prudence review, initiated by Staff on January 15, 2016 in Case No.
12 EO-2016-0183, Staff recommended seminar training costs of \$6,000 plus interest be
13 returned to customers in the semi-annual DSIM rate update filed on November 30, 2016.
14 The second prudence review was initiated by Staff on February 1, 2017 in Case No. EO-
15 2017-0209. Staff found no instances of imprudence by KCP&L but recommended the
16 Commission approve an adjustment of \$4,723 plus interest resulting from a calculation
17 error found in KCP&L's performance incentive award amount for Cycle 1 be returned to
18 customers in in the semi-annual DSIM rate update filed on June 1, 2018.

19 **Q: What action is KCP&L requesting from the Commission with respect to the rate
20 schedule that the Company has filed?**

21 A: The Company requests the Commission approve the rate schedule to be effective as of
22 February 1, 2019.

1 Q: Does that conclude your testimony?

2 A: Yes, it does.