

Exhibit No.:
Issue: *Rate Design*
Witness: *Jessica Oakley*
Type of Exhibit: *Direct Testimony*
Sponsoring Party: *Brightergy, LLC*
Case No.: *ER-2016-0156*
Testimony Date: *July 29, 2016*

MISSOURI PUBLIC SERVICE COMMISSION

File No: ER-2016-0156

DIRECT TESTIMONY

OF

JESSICA OAKLEY

ON BEHALF OF

BRIGHTERGY, LLC

Kansas City, Missouri

July 29, 2016

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**REBUTTAL TESTIMONY
OF
JESSICA OAKLEY
File No. ER-2016-0156**

Q: Please state your name and business address.

A: My name is Jessica Oakley. My business address is 1712 Main Street, 6th Floor, Kansas City, MO 64108.

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

A: I am the Vice President of Client Solutions for Brightergy, LLC ("Brightergy"), an energy company offering distributed generation and a variety of energy efficiency services. Brightergy has offices in Kansas City, Missouri, St. Louis, Missouri, and Boston, Massachusetts.

Q: As Vice President for Client Solutions, what are your responsibilities at Brightergy?

A: I manage our new product offerings, including marketing and sales support. I also perform energy savings analysis for current clients and new proposals.

Q: What is your educational background?

A: I have a bachelor's degree in mechanical engineering from Virginia Polytechnic Institute. I also have Certified Energy Manager and Certified Demand Side Manager credentials from the Association of Energy Engineers.

Q: Have you previously testified in a proceeding at the Missouri Public Service Commission ("MPSC" or "Commission") or before any other utility regulatory agency?

A: No I have not.

Q: Please describe Brightergy and its presence in the state of Missouri.

A: Brightergy has more than 70 employees among its three offices in Kansas City, Missouri and St. Louis, Missouri, and Boston, Massachusetts. In addition, Brightergy contracts with several Missouri electrical contractors who perform installations of solar systems, lighting retrofits, and other energy efficiency related projects. The employment resulting from these business relationships extends well beyond Brightergy's full-time employees.

1 **Q: Please describe Brightergy’s business operations in the state of Missouri.**

2 **A:** Brightergy assists energy consumers in taking control of their electricity expenditures in a
3 number of ways. To name a few, Brightergy offers residential and commercial solar energy
4 installations, energy efficiency audits and projects, and various energy management
5 services. Brightergy also assists its clients in applying for necessary permits and financial
6 incentive processing including, utility rebates. Brightergy has over 500 commercial clients in the
7 state of Missouri.

8 **Q: What is the purpose of your Direct Testimony?**

9 **A:** The purpose of my testimony is to encourage the KCP&L-Greater Missouri Operations
10 Company (“GMO”) and the Commission to allow residential and commercial customers to take
11 advantage of time of use rates.

12 **Q: Can you explain Time of Use rates?**

13 **A:** Yes. Time of Use (“TOU”) rates encourage customers to shift their electrical usage to from
14 peak periods to off-peak periods by offering a higher on-peak rate and lower off-peak rate.

15 **Q: What is preventing customers from taking advantage of TOU rates?**

16 **A:** As noted in the Direct Testimony of Brad Lutz at p.22 and 23, the Company proposes to
17 “freeze” TOU rates, which would prevent customers from paying less for electricity at certain
18 times.

19 **Q: Would this structure further any of Missouri’s public policy goals?**

20 **A:** Yes, this rate structure would reduce the Company’s peak demand. On a TOU rate, a
21 customer is incentivized to move load from peak hours to off-peak hours.

22 **Q: How should GMO’s tariffs be changed to accomplish this goal?**

23 **A:** GMO should remove the freeze date of March 24, 2016 from the tariffs and leave it
24 available to new customers. The affected tariffs are MO600, MO610 ,MO620, MO630, and
25 MO640 in the proposed tariffs.

26 **Q: Are you aware of any other major utilities that have adopted this rate structure?**

1 **A:** Yes. Many utilities offer a TOU rate structure, including Ameren.

2 **Q:** **Would this structure result in increased rates for any other customer class?**

3 **A:** No. This rate structure would be an optional tariff for customers within a customer class.

4 **Q:** **Do you know the Company's position regarding these rates?**

5 **A:** My understanding is that the Company has had little participation in these tariffs and that
6 is why they have asked to have them frozen.

7 **Q:** **What would increase participation in these rates?**

8 **A:** Technological innovation will lead to more monitoring of load devices, increasing a
9 customer's ability to schedule load (for example, delay timers on dishwashers and washing
10 machines), customers will have more flexibility in shifting their electrical consumption to times
11 when their electricity costs are lower.

12 **Q:** **Does this conclude your rebuttal testimony?**

13 **A:** Yes.

14