

Exhibit No.:
Issue: Fuel Adjustment Clause; MEEIA Cycle
1; Clean Charge Network; Greenwood
Solar Facility; Transmission Revenues
& Expenses and Property Taxes
Witness: Tim M. Rush
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Kansas City Power & Light Company
Case No.: ER-2016-0285
Date Testimony Prepared: January 27, 2017

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2016-0285

SURREBUTTAL TESTIMONY

OF

TIM M. RUSH

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

**Kansas City, Missouri
January 2017**

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Case No. ER-2016-0285

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 the “Company”)
6 as Director, Regulatory Affairs.

7 **Q: On whose behalf are you testifying?**

8 A: I am testifying on behalf of KCP&L.

9 **Q: Are you the same Tim M. Rush who filed Direct and Rebuttal Testimony in this**
10 **proceeding?**

11 A: Yes, I am.

12 **Q. What is the purpose of your surrebuttal testimony?**

13 A: I will address the following issues presented by Staff, OPC and other parties to this case:
14 Fuel Adjustment Clause, MEEIA Cycle 1, Clean Charge Network, Greenwood Solar
15 Facility, Transmission Revenues & Expenses and Property Taxes.

1 FUEL ADJUSTMENT CLAUSE

2 **David Roos (Staff)**

3 **Q: Would you please describe the rebuttal testimony of Staff witness David Roos as it**
4 **pertains to the FAC?**

5 A: Mr. Roos does not agree with KCP&L’s proposal to include all Southwest Power Pool
6 (SPP) transmission costs and revenues in the FAC. He recommends that the only
7 transmission costs that should be included in KCP&L’s FAC are those costs that KCP&L
8 incurs to (1) transmit electric power it did not generate to serve its own native load and
9 (2) transmit excess power it is selling to third parties located outside of the SPP. He also
10 does not agree with the inclusion of “fuel handling expenses” in the FAC. In the
11 subaccounts for “fuel handling expense” he indicates there were costs assigned to fuel
12 handling that are not fuel and purchased power costs appropriate for inclusion in the
13 FAC. Additional reporting requirements for the FAC were also proposed by Mr. Roos.

14 **Q: How do you respond to Mr. Roos’ position that some SPP transmission revenues**
15 **and costs should not be included in the FAC?**

16 A: I disagree. As discussed in both my Direct and Rebuttal testimonies, the Company
17 continues to support the inclusion of transmission costs included in FERC accounts 565,
18 561.4, 561.8, 575.7, and 928 because they are costs that are necessary to transport power
19 to its customers, not under the control of the Company, and are volatile. .

20 **Q: Do you agree with Mr. Roos’ position that fuel handling expenses should be**
21 **excluded from the FAC?**

22 A: No. Refer to the Surrebuttal testimony of Company witness Wm. Edward Blunk for a
23 discussion of this issue.

1 **Q: What are the additional reporting requirements that Mr. Roos recommended?**

2 A: Nine additional reporting requirements were recommended by Mr. Roos. They are as
3 follows:

- 4 1. As part of the information KCP&L submits when it files a tariff modification to change
5 its Fuel and Purchased Power Adjustment rate, include KCP&L's calculation of the
6 interest included in the proposed rate;
- 7 2. Maintain at KCP&L's corporate headquarters or at some other mutually agreed-upon
8 place and make available within a mutually-agreed-upon time for review, a copy of each
9 and every coal, coal transportation, natural gas, fuel oil, and nuclear fuel contract
10 KCP&L has that is in or was in effect for the previous four years;
- 11 3. Within 30 days of the effective date of each and every coal, coal transportation, natural
12 gas, fuel oil, and nuclear fuel contract KCP&L enters into, KCP&L provide both notice
13 to Staff of the contract and opportunity to review the contract at KCP&L's corporate
14 headquarters or at some other mutually-agreed-upon place;
- 15 4. Provide a copy of each and every KCP&L hedging policy that is in effect at the time the
16 tariff changes ordered by the Commission in this rate case go into effect for Staff to
17 retain;
- 18 5. Within 30 days of any change in a KCP&L hedging policy, provide a copy of the
19 changed hedging policy for Staff to retain;
- 20 6. Provide a copy of KCP&L's internal policy for participating in the SPP's Integrated
21 Market;

- 1 7. Maintain at KCP&L’s corporate headquarters or at some other mutually agreed-upon
2 place and make available within a mutually agreed-upon time for review, a copy of each
3 and every bilateral energy or demand sales/purchase contract;
- 4 8. If KCP&L revises any internal policy for participating in the SPP, within 30 days of that
5 revision, provide a copy of the revised policy with the revisions identified for Staff to
6 retain; and,
- 7 9. The monthly as-burned fuel report supplied by KCP&L required by 4 CSR 240-
8 3.190(1)(B) shall explicitly designate fixed and variable components of the average cost
9 per unit burned, including commodity, transportation, emissions, tax, fuel blend, and any
10 additional fixed or variable costs associated with the average cost per unit reported.

11 **Q: Do you agree with the additional reporting requirements recommended by Mr.**
12 **Roos?**

13 A: I agree with the items 1-8 listed above, with the following clarifications and additions:

- 14 • Item #3 should be edited to remove “and opportunity to review the contract at KCP&L’s
15 corporate headquarters or at some other mutually-agreed-upon place.” Signed contracts
16 are not always available within 30 days of the effective date.
- 17 • Items #4-6, and 8 should be marked as Highly Confidential.
- 18 • The Company disagrees with item # 9.
- 19 • Please note that the Company currently provides the information requested in items 1-8.

20 **Q: Why does the Company disagree with item #9?**

21 A: The General Ledger is the source of the monthly as-burned fuel reports. These items are
22 not split out or distinguishable at this level of detail in the general ledger. A change to
23 this would require changes to the fuel system subsidiary ledger, joint owner fuel

1 processes for KCP&L's jointly owned power plants as well as a reporting overhaul.
2 KCP&L feels this is burdensome, not required by the FERC USoA and not required by
3 the FAC statute.

4 **Robin Kliethermes (Staff)**

5 **Q: Would you please describe the rebuttal testimony of Staff witness Robin**
6 **Kliethermes as it pertains to the FAC?**

7 A: Ms. Kliethermes expresses concerns with the interaction of KCP&L's FAC and an
8 inclining block rate design, as it relates to revenue stability for both KCP&L and its
9 customers.

10 **Q: Do you agree with Ms. Kliethermes assertion?**

11 A: Generally, I agree. Many issues must be investigated and resolved regarding the design
12 and implementation of an inverted rate design to encourage customers to conserve
13 electricity. Staff has raised an important FAC issue that needs to be evaluated as well.

14 **Lena M. Mantle (OPC)**

15 **Q: Please summarize the rebuttal testimony of Lena M. Mantle as it pertains to the**
16 **FAC.**

17 A: Ms. Mantle's position recommends that KCP&L be limited to only include the costs and
18 revenues included in KCP&L's FAC to direct fuel and purchased power costs, including
19 transportation and off-system sales revenues. She argues on page 11 that fuel costs are
20 not increasing, but rather it is the non-fuel related costs that are increasing. Ms. Mantle
21 claims on pages 13-14 that KCP&L did not meet the minimum filing requirements in this
22 case. Ms. Mantle also recommends multiple additional reporting requirements at pages

1 22-23, including a request that Staff's recommendation requiring KCP&L to provide
2 certain information also extend to OPC.

3 **Q: Do you agree with Ms. Mantle's position regarding exclusion of certain costs and**
4 **revenues in the FAC, as well as the argument that fuel costs are not increasing?**

5 A: No. Ms. Mantle defines many of the SPP costs as non-fuel related. This has been an
6 ongoing argument between KCP&L and Ms. Mantle, and is discussed in both my Direct
7 and Rebuttal testimony. It is also addressed in the Rebuttal testimony of KCP&L witness
8 Wm. Edward Blunk and in the Surrebuttal testimony of both Mr. Blunk and KCP&L
9 witness Jessica L. Tucker.

10 **Q: How do you respond to Ms. Mantle's suggestion that certain costs and revenues be**
11 **excluded from the FAC?**

12 A: She defines many of SPP costs as non-fuel related, however, the majority of costs Ms.
13 Mantle recommends be excluded from the FAC were incurred to provide critical
14 components of fuel and purchased power operations that provide electricity to our
15 customers. The Company gains the efficiencies of the SPP Integrated Market (IM) that
16 benefit customers through serving retail load, and buying and selling power off-system.
17 SPP's IM is consistent with national energy policies being implemented by FERC to
18 ensure reliable supplies of power, adequate transmission infrastructure, and competitive
19 wholesale prices of electricity. SPP's IM was implemented in response to these policies.
20 Through the IM and the transmission that enables the IM, SPP is working to minimize the
21 total cost of electricity within the region.

1 **Q: How do you respond to Ms. Mantle’s suggestion that fuel costs are not increasing?**

2 A: I disagree. Ms. Mantle has incorrectly calculated fuel costs by excluding SPP and
3 regulatory costs. She claims at page 11 of her Rebuttal testimony that these are
4 “additional types of costs” and has interpreted the FAC rules to include only transmission
5 associated with purchased power to serve native load and transmission to serve off-
6 system sales. Transmission costs should include all transmission costs charged to the
7 Company to move its electricity as well as transportation costs associated with fuel
8 purchases. Additionally, a primary component of the FAC has been the inclusion of off-
9 system sales and the fuel cost associated with those sales. The net of this amount is
10 referred to as the off-system sales margins. The margins are treated as an offset or
11 reduction to overall fuel and purchased power costs, and are included in the FAC. The
12 off-system sales margins have substantially declined in this case compared to the last
13 KCP&L rate case.

14 **Q: Do you agree with Ms. Mantle that KCP&L did not meet the minimum filing**
15 **requirements?**

16 A: No. Ms. Mantle indicates at pages 13-14 of her rebuttal that KCP&L did not provide an
17 explanation of all costs, revenues, rate volatility mitigation features, and heat rate testing
18 in the proposed FAC. OPC witness John Robinett addresses the heat rate testing further
19 in his rebuttal testimony. Company witness Burton Crawford will respond to the issue of
20 heat rate testing in his Surrebuttal testimony.

1 **Q: How do you respond to Ms. Mantle’s statement that KCP&L did not provide a**
2 **complete explanation of all costs and revenues as part of the minimum filing**
3 **requirements?**

4 A: On page 14 of her rebuttal, Ms. Mantle claims to the resource code information provided
5 by KCP&L was “limited.” She indicates the resource codes do not give a complete
6 explanation as to what is recorded in the FERC account. It appears that Ms. Mantle’s
7 concern is that the Company does not file, as part of its MFR’s (minimum filing
8 requirements), all of the extremely detailed cost and revenue information the Company
9 currently provides to Staff and OPC in FAC adjustment filings and monthly reports.
10 Both the Commission and OPC have been provided the information needed to understand
11 the costs and revenues through the ongoing FAC reporting requirements and data request
12 responses as part of a rate case. This information allows them to review the FAC and
13 determine if the Company is complying with its Commission-approved tariff. The
14 Company has complied with what the Commission requires as part of the ongoing FAC
15 reporting requirements. OPC requests more information than what is required by the
16 FAC rule. It seems Ms. Mantle has not paid attention to the huge amount of data and
17 information the Company has already provided OPC as part of the ongoing FAC
18 reporting requirements and data request responses

19 **Q: How do you respond to Ms. Mantle’s statement that KCP&L did not provide a**
20 **complete explanation of any rate volatility mitigation features in the proposed FAC?**

21 A: I disagree. Rate volatility mitigation features were addressed in my Direct testimony in
22 Schedule TMR-1 and in the Direct testimony of Mr. Blunk, which it referred to. This is

1 consistent with what KCP&L filed in its last rate case. However, they were evidently not
2 addressed in the detail desired by Ms. Mantle.

3 **Q: Ms. Mantle has proposed at pages 22-23 of her rebuttal additional reporting**
4 **requests beyond the Staff's additional reporting requests addressed in its direct**
5 **testimony. What concerns do you have with the added reporting requirements?**

6 A: One of Ms. Mantle's recommendations is to add OPC to the notifications Staff has
7 requested. The Company has no issue with this. She also recommended communications
8 pertaining to the hedging program. The Company has ceased its hedging activity and
9 therefore no communication is necessary. I If the Company resumes hedging, it will
10 notify OPC. As noted in my direct testimony, it is important to keep the hedging
11 language in the FAC so that if there were a change in natural gas and power markets that
12 showed a need to initiate a hedging program in the future, the costs of that program
13 would be included in the FAC. OPC also recommends the Commission order KCP&L to
14 include in its monthly FAC submission the FAC cost or revenue by subaccount for that
15 month and for the twelve months ending that month. In addition, OPC requested the
16 monthly as-burned fuel report supplied by KCP&L required by 4 CSR 240-3.190(1)(B)
17 shall designate fixed and variable components of the average cost per unit burned. As I
18 indicated above in my response to the same request made by Staff, the Company
19 disagrees with this request.

20 **Q: What other recommendation does Ms. Mantle make regarding additional reporting**
21 **requirements?**

22 A: Ms. Mantle states that purchased power costs and off-system sales revenues provided in
23 all FAC filings and report submissions be in accordance with FERC Order 668 and the

1 Commission's definition of purchased power costs and off-system sales revenue. She
2 points to OPC witness John Riley's Rebuttal testimony where he discusses this further.
3 The Company's issues with Ms. Mantle's and Mr. Riley's suggestions are discussed in
4 the Surrebuttal Testimony of Company witness Elizabeth A. Herrington. Ms. Mantle
5 also challenges the inclusion of fuel handling expense. Please refer to the surrebuttal
6 testimony of Company witness Wm. Edward Blunk for a discussion of this issue.

7 **John Riley (OPC)**

8 **Q: Please summarize the Rebuttal testimony of John Riley as it pertains to the FAC.**

9 A: Mr. Riley states that his testimony addresses KCP&L's alleged lack of transparency in
10 presenting information for calculating the Company's FAC Base, specifically its
11 presentation of purchased power costs and off system sales revenues. He indicates that
12 the Company presents totals that do not conform to FERC guidelines or prior
13 Commission decisions, and claims the calculations and account totals presented are
14 confusing and inaccurate.

15 **Q: How does Mr. Riley suggest there is a lack of transparency in the presentation of**
16 **purchased power costs and off system sales revenues?**

17 A: Mr. Riley references FERC Order 668 in his claim of lack of transparency. Please see the
18 surrebuttal testimony of Company witness Elizabeth A. Herrington for a discussion on
19 why this is a false statement. Mr. Riley notes that while KCP&L records transactions on
20 the books correctly, figures represented in the Company's testimony and rate case work
21 papers are reflected as un-netted figures. Mr. Riley's position is that this misrepresents
22 the Company's operations which are what FERC Order 668 was intended to address.

1 The Company disagrees with this assessment, as Ms. Herrington explains in her
2 Surrebuttal Testimony.

3 **Q: How do you respond to Mr. Riley’s position?**

4 A: The Company properly records on its books and records the Southwest Power Pool
5 Integrated Marketplace costs and revenues according to FERC Order 668. The
6 Commission has not ordered the Company to model net fuel costs for rate case purposes
7 in the same manner. The Commission only ordered the Company to identify “true
8 purchased power and off system sales” in order to calculate the transmission costs it
9 would allow to flow through the FAC. This calculation of what is considered true
10 purchased power and off system sales has nothing to do with the accounting treatment of
11 netting revenues and costs on an hourly or five minute mWh basis, as prescribed by
12 FERC Order 668. As Company witness Ms. Herrington explains in her Surrebuttal
13 testimony in this case, Mr. Riley is attempting to force KCP&L to use a FERC
14 accounting order to calculate KCP&L’s base FAC rate. Ms. Herrington explains why
15 FERC Order 668 was not intended to be used in this manner.

16 **John Robinett (OPC)**

17 **Q: Would you please describe the Rebuttal testimony of OPC witness John Robinett as
18 it pertains to the FAC?**

19 A: Mr. Robinett recommends the Commission order KCP&L to provide heat rate testing
20 reports for each generating unit with the direct filing of its next general rate increase.
21 Further, he suggests that KCP&L should supply heat rate curves and reports that were
22 used to generate the results, as presented in Company witness Burton Crawford’s Direct

1 testimony and as supplemented by the Company responses to data requests. He also
2 recommends the removal of unit train depreciation expense from the FAC.

3 **Q: How do you respond to the recommendation to provide heat testing reports with the**
4 **next rate case filing as well as heat rate curves and reports to generate Company**
5 **testimony and data request responses.**

6 A: This issue is addressed in the Surrebuttal testimony of Company witness Burton
7 Crawford.

8 **Q: Do you agree with Mr. Robinett's position that unit train depreciation expenses**
9 **should be excluded from the FAC?**

10 A: No. The Surrebuttal testimony of Company witness Herrington responds to the unit train
11 depreciation expense issue raised by Mr. Robinett.

12 **James Dauphinais (MIEC)**

13 **Q: Would you please describe the Rebuttal testimony of MIEC witness James**
14 **Dauphinais as it pertains to the FAC?**

15 A: Mr. Dauphinais argues that KCP&L's representation of projected revenues to annualize
16 the Company's transmission revenues misrepresents how KCP&L utilizes the SPP
17 market to help serve its native load customers and assure conformance to FERC Order
18 No. 668 with respect to the accounting of sales to and purchases from RTO markets. He
19 states that the pro-forma adjustments proposed by KCP&L should be modified to be
20 consistent with the mWh of off-system energy sales and purchased energy reported on
21 KCP&L witness Crawford's Schedule BLC-4.

1 **Q: How do you respond to Mr. Dauphinais’s assertion that using projected revenues to**
2 **annualize transmission revenues misrepresents the Company’s use of the SPP**
3 **Integrated Marketplace (“IM”) and is not in conformance with FERC Order No.**
4 **668?**

5 A: Transmission revenues are not subject to FERC Order No. 668. FERC Order 668 applies
6 to purchased power and off-system sales from the SPP IM. The surrebuttal testimony of
7 Company witness Ms. Herrington addresses this issue.

8 **MEEIA**

9 **Q: How do you respond to Staff witness Michael Stahlman’s assertion that an**
10 **adjustment is unwarranted to reflect energy savings that have occurred over the**
11 **time period between the test period and the true-up period?**

12 A: I think Mr. Stahlman is making this assertion without any basis what-so-ever. First, he
13 implies that the Stipulation and Agreement in Case No. EO-2015-0240 does not mention
14 Cycle 1 for the calculation in question. This is not correct at all. As I presented in my
15 rebuttal Testimony in this proceeding, beginning on page 12, nowhere does it mention
16 that the rate adjustment to reflect the reduction in sales and demand is limited to Cycle 2
17 programs. Second, the adjustment made for both Cycle 1 and Cycle 2 reductions in both
18 sales and demand are directly quantified. Particularly, Cycle 1 has been validated
19 through a rigorous evaluation, measurement and verification process and this
20 Commission recently approved the DSIM rate adjustment which includes the recovery of
21 the performance incentive associated with the success of the program. Third, Staff
22 continues to argue that you must match all costs and revenues to the test period through
23 the true-up. By not reflecting this adjustment in the sales and sales revenues of this case,

1 Staff is purposely ignoring a significant known change in base sales and sales revenues in
2 the test period.

3 **Q: Have you addressed this in your rebuttal testimony?**

4 A: Yes, I have addressed this at some length.

5 **Q: Was Staff aware that this would be an issue in this case?**

6 A: Yes. The Company just concluded its rate case for KCP&L Greater Missouri Operations
7 Company (“GMO”), in which this was an issue of the case. Both the test period and true-
8 up were different periods and the adjustment was smaller, but this Staff was made aware
9 that this would be an issue in this case. The GMO case was settled so this issue was not
10 tried before this Commission.

11 **Q: Why is this issue a significant issue in this case?**

12 A: Because this issue, along with all other sales adjustments sets the foundation for the
13 overall case. If an increase is granted in this proceeding, it is the sales and revenues
14 determined in the case that the increase is applied. By not reflecting the appropriate sales
15 adjustment to the test period through the true-up, the rate case will show more revenues
16 than would actually be there and therefore, the utility would start out with rates that
17 would not be able to produce the revenues the year rates go into effect.

18 **CLEAN CHARGE NETWORK**

19 **Q: How do you respond to the position taken by OPC witness Geoffrey Marke
20 regarding the electric vehicle (“EV”) charging station?**

21 A: OPC believes that EV charging stations should be an unregulated business and that the
22 price should be whatever the market will bear. Dr. Marke misses the point and the basis
23 for the Company installing the EV charging stations. As has been presented in this case,

1 as well as in Case No. ER-2014-0370, KCP&L's direct interest in EV charging stations is
2 to help facilitate the establishment of an EV charging station network that will help in
3 developing the EV market as well as providing necessary electric service to EV owners.
4 The Company believes that an EV charging station network is a regulated business at this
5 time.

6 **Q: Does the Company believe it is inhibiting a competitive marketplace as Dr. Marke**
7 **suggests?**

8 **A:** No. The Company believes that either legislation or tariff changes, or both, are necessary
9 to aid in allowing the market to grow outside of the regulated business. That being said,
10 the Company encourages the Commission to seek out ways to allow for non-utilities to
11 participate in the EV charging marketplace.

12 **Q: Does Dr. Marke provide any evidence regarding third parties that are interested in**
13 **installing, owning and maintaining EV charging stations?**

14 **A:** No. While Dr. Marke tries to argue that the Company is preventing a competitive
15 marketplace from taking hold, publicly available information shows that there are only 50
16 locations with publicly available charging stations¹ in the State of Missouri that are not
17 owned by an electric utility, auto dealership or auto manufacturer. In other words,
18 without the charging stations discussed in this case, the Company would not be providing
19 essential service to its customers who want the ability to charge their electric vehicles
20 across the entirety of the Company's service territory. This is a chicken or egg situation
21 and while internal combustion engines have the flexibility to fill up their gas tanks on just
22 about every corner, electric vehicles do not. The Company's efforts are continuing to

¹ DOE EERE Alternative Fuels Data Center, http://www.afdc.energy.gov/fuels/electricity_locations.html

1 reduce range anxiety within its territory as is indicative of the fact the Kansas City region
2 is second in the nation for EV growth since launch of the Clean Charge Network.

3 **Q: Dr. Marke states on p. 38 of his rebuttal testimony that range anxiety “may already**
4 **be overstated.” Do you agree with this statement?**

5 A: No. Company surveys (See Schedule TMR-11) have indicated that aside from costs of
6 electric vehicles, range anxiety is the highest concern of potential EV buyers. The
7 Company does not dispute that a significant amount of charging is done at home by
8 electric vehicles. However it would be a disservice to EV owners to fail to provide the
9 service they need throughout the day

10 **Q: OPC witness Marke at p. 34 of his rebuttal testimony, mentions an EPRI study and**
11 **an application that were referenced in your testimony but not included. Can you**
12 **provide the clarification that Dr. Marke requests?**

13 A: The references to those items should not have been included in my testimony. The EPRI
14 study and application was used in the Company’s CCN application before the Kansas
15 Corporation Commission.

16 **Q: Do you agree that there is an issue with electric vehicle drivers “not paying their fair**
17 **share of the transportation infrastructure in Missouri,” as Dr. Marke suggests on p.**
18 **47?**

19 A: I do not believe that this case is the appropriate environment to discuss how or when
20 electric vehicles drivers should or should not be taxed in order to maintain Missouri’s
21 transportation infrastructure. I also do not believe the Commission has the statutory
22 authority to establish taxes. However, the Company through their selected billing vendor
23 will collect all the applicable taxes for each jurisdiction in which its stations are located.

1 **Q: How do you respond to NRDC witness Noah Garcia?**

2 A: Mr. Garcia supports the Company's investment in the Clean Charge Network ("CCN")
3 and supports recovery of the costs from all customers. Mr. Garcia proposes that the
4 Company extend the EV charging station network to more long dwell time locations,
5 such as multi-unit dwellings and workplaces, and highway corridor charging to support
6 long-distance electric vehicle travel. Currently, the Company's plan for the EV network
7 is nearing completion The Company seeks to establish a tariff and place the investment in
8 rate base to allow recovery of the investment the Company has made in the EV charging
9 station network.

10 **Q: Do you agree that increased electric vehicles will lead to downward pressure on**
11 **rates?**

12 A: Yes. As electric vehicle adoption continues to grow, the Company's cost will be further
13 spread out across the additional load generated by electric vehicle charging, both at home
14 and at publicly available charging stations.

15 **Q: Staff witness Byron Murray presents rebuttal testimony in which he indicates that**
16 **Staff has changed its position that the costs and revenues for the EV charging**
17 **stations should be below the line and now recommends that these investments and**
18 **related expenses should be included above the line. However, Staff goes further to**
19 **state that if the revenues are not sufficient to recover the costs and investment, then**
20 **a revenue imputation will be made. How does the Company respond?**

21 A: It is unclear how the Staff would intend to accomplish its proposal. More important,
22 because the Company has little revenue generated by the charging stations at this time,
23 the Staff's proposal to impute costs not covered by revenues is in effect achieving the

1 same result as placing costs below the line. Also, I cannot think of any regulated service
2 provided by a utility where a revenue imputation is made to address any shortage of
3 revenues from that service. If this practice was broadly applied for services to customers,
4 then the Company would likely never build a new substation in a growing area, because it
5 would be unable to recover its cost of service. Likewise, we would not provide services
6 to a new customer in a growing area since new customers do not typically recover the
7 initial cost of providing them service. Staff's position also does not take into account
8 how revenues for additional energy usage associated with EV charging would be treated.
9 I believe Staff's position should not be adopted.

10 **Q: In your direct testimony, you included the overall cost that the Company estimated**
11 **for the EV Charging plant in service, expenses, tax impact and return on investment**
12 **at \$16,434. Have you updated this number?**

13 A: Yes. Based on plant in service as of the end of 2016, the overall revenue requirement for
14 the CCN is approximately a negative \$400,000. (See Schedule TMR-12) This means
15 that the costs that will be in the true-up for this case will actually reduce the revenue
16 requirement by that amount. This calculation assumes the Commission will approve the
17 Company's proposed depreciation rate that is contained in the direct testimony of
18 Company witness John Spanos for a 10 year depreciation rate for EV charging stations.
19 Based on Staff's proposed treatment, it is unclear on what they would actually propose
20 for depreciation rates under the current circumstances of this case. Using Staff's
21 proposed treatment would mean increasing the revenue requirement beyond the value
22 calculated.

1 Q: **Are you familiar with the Georgia Power PEV-TOU rate that Mr. Murray mentions**
2 **on p. 3 of his rebuttal testimony?**

3 A: The PEV-TOU rate is one of three whole-home rates available to residential customers of
4 Georgia Power who are engaged in domestic charging.

5 Q: **While Staff is not currently proposing to implement a similar tariff, do you believe**
6 **that this specific tariff would be appropriate at this time?**

7 A: No. The Company is actively engaged in studying TOU rates, and as Witness Murray
8 stated, the Company cannot currently implement TOU rates with its current systems.
9 However, I do believe that the title of the tariff mentioned by Witness Murray is
10 misleading as the tariff is available to all residential customers, not just those that own an
11 electric vehicle. The tariff is essentially a whole house TOU rate which would be more
12 favorable in terms of implementation compared to an EV rate that separately billing
13 customer for energy only utilized in electric vehicle charging. An EV charging only rate
14 would require a second meter and additional customer installation expense.

15 Q **Please describe Staff's recommendation regarding KCP&L's CCN tariff.**

16 A Staff's recommendations present three scenarios on how rates could be determined for
17 the KCP&L's public charging station. These scenarios are based on three constructs that
18 are different from the constructs KCP&L used in developing the CCN tariff: 1) both
19 Level 2 and Level 3 rates should be based on the SGS tariff²; 2) the tariffs be based on a

² R. Kliethermes, Rebuttal, p.9, Lines 6-7

1 time-of-use (“TOU”) rate structure³; and 3) and a fixed, per hour session charge
2 applicable to all charge sessions⁴.

3 **Q Do you agree that both Level 2 and Level 3 rates should be based on the SGS tariff**
4 **as recommended by Staff?**

5 A Generally. I agree that it would be reasonable to use the demand based customer and
6 facility charges present in the SGS rate to calculate the rate differential between Level 2
7 and Level 3 charging. However, the base customer charge should be included in the kWh
8 rates instead of the session fee as proposed by Staff.

9 **Q Do you agree that the CCN tariff should be a TOU rate?**

10 A No, not at this time. First, under the tariff either the host or the driver may be responsible
11 for payment and the existing KCP&L billing system, which will be used to properly
12 account for all riders, adjustment mechanisms, taxes, and fees, is not capable of billing
13 the TOU rates described. Secondly, KCP&L is currently conducting several Commission
14 ordered rate analyses that are not yet complete. It would be premature to implement a
15 TOU rate for CCN before studies are complete. Third, I have concerns about
16 complicating the initial adoption of the CNN. Drivers are used to all in ‘gas pump’
17 pricing and statutes already require KCP&L list the tax and franchise fees separately
18 from the all-in energy or session fees. Adding a TOU construct would further complicate
19 the communication of pricing to drivers. Finally, the CCN can participate in load
20 curtailment events by reducing the charge level available at each charge station. By

³ R. Kliethermes, Rebuttal, p.9, Lines 16-19

⁴ R. Kliethermes, Rebuttal, p.9, Lines 12-14

1 actively managing the charge level at critical times, EV drivers provide a demand
2 response resource without the complication of TOU pricing.

3 **Q Do you agree that the CCN tariff should specify a fixed, per hour session charge**
4 **applicable to the duration of all charge sessions as recommended by Staff?**

5 **A** No. The Company desires the flexibility to implement session charges as the need arises
6 to incent charging station users to move their vehicles promptly after charging to improve
7 utilization of the stations. Session fees that apply to the entire charge session create
8 several concerns. The KCP&L billing system does not have the ability to bill session
9 fees, therefore, they must be collected from the driver through ChargePoint. This
10 precludes the ability of a host to provide ‘free’ charging to their patrons. As an
11 ‘overstay’ fee, the host could provide the charging period ‘free’ and the ‘overstay’ fee
12 would be billed to the driver. Further, a session fee that applies while the EV is charging
13 complicates the use of the charging station for load curtailment. The driver would be
14 paying the session fee while the available charge rate has reduced.

15 **GREENWOOD SOLAR STATION**

16 **Q: What is your response to OPC witness Marke regarding Greenwood Solar Station?**

17 **A:** While Dr. Marke opposes inclusion of any of the Greenwood Solar Station in rates, he
18 supports a 33.33% allocation to each electric rate jurisdiction, KCP&L-MO, KCP&L-KS
19 and GMO. This allocation methodology is similar to Staff’s proposal. As I presented in
20 my rebuttal testimony, I disagree with Staff’s approach and therefore disagree with Dr.
21 Marke’s proposal as it inappropriately allocates costs to KCP&L’s Missouri and Kansas
22 rate jurisdictions without considerations of all of the other projects and investments of
23 both GMO and KCP&L that have provided knowledge that is shared between utilities.

1 Additionally, I believe the allocation is flawed in that it disproportionately allocates a
2 higher percentage to KCP&L than GMO. This would imply that knowledge is more
3 expensive for KCP&L than for GMO, simply because it serves more customers. This is
4 illogical as I discussed in my rebuttal testimony.

5 **Q: What is the value of this issue?**

6 A: My recommendation is that no allocation should be made, but if an assignment or
7 allocation is ordered, then \$100,000 is the appropriate allocation for KCP&L-MO. I
8 believe Staff's proposed allocation is approximately \$420,000, based on plant in service
9 at the end of 2016, Staff's allocation would add another \$400,000 to KCP&L-KS, This
10 would leave about \$420,000 to GMO, where the plant was built and is providing energy
11 to GMO's customers.

12 **TRANSMISSION EXPENSE & REVENUES and PROPERTY TAX**

13 **Q: What is Staff's position regarding the use of projected transmission expense?**

14 A: Staff witness Karen Lyons contends that the Company is only considering one side of the
15 issue, i.e. rising costs and ignoring costs that are decreasing. As such, Ms. Lyons
16 recommends to the Commission deny the Company's request for inclusion of forecasted
17 costs for transmission expenses and revenues in this case, whether in the FAC or in base
18 rates.

19 **Q: How do you respond?**

20 A: The Company has evaluated the cost and the trends of those costs. Additionally, the
21 Company has looked at the costs that are essentially out of the Company's control and
22 are rising faster than other costs and which are primary drivers for the rate requests in
23 recent years. I presented tables in my rebuttal testimony that demonstrated the

1 unrecovered amounts of transmission expenses that have impacted the Company over the
2 last four years. For transmission expenses, the tables clearly demonstrate that the
3 Company has not recovered over \$44 million, or about \$11 million annually.

4 **Q: How does Staff propose to address this deficiency that has occurred over the last**
5 **four years in this case?**

6 A: First, I would say that Ms. Lyons recognizes the upward trend in transmission expenses
7 between 2009 and 2016. This data would be similar to my table on page 8 of my rebuttal
8 testimony. Ms. Lyons presents her recommendation for addressing this deficiency by
9 indicating that Staff would use the last twelve months of costs as of June 30, 2016, and
10 indicates that they will look at it further in the true-up of this case. The problem with this
11 approach is that the Company is always behind, as demonstrated in the table on page 8 of
12 my rebuttal testimony. For example if you look at the table, you will see that in 2012,
13 rates were established to recover \$6.7 million for KCP&L from Case No. ER-2010-0355,
14 yet expenses were nearly \$13 million for the year following the rate implementation.
15 Similarly, in 2014, transmission expenses were set at \$14 million in the last rate case but
16 the transmission expense in that year was \$27 million.

17 **Q: Do you think Staff's proposal to use a historical level of transmission expenses to set**
18 **rates for the following year make sense when in fact, both Staff and Company agree**
19 **that costs are increasing at a rapid pace?**

20 A: Not at all. Given that over the last four years, the Company has unrecovered
21 transmission expenses exceeding \$44 million, I think that Staff's proposal is simply a
22 continuation of the "same old thing" and does not recognize the reality of the situation.
23 Staff and other participants recently completed a review of policies to improve electric

1 utility regulation, and I don't believe Staff's approach lives up to one of the principles
2 outlined in Staff's Report contained in Docket No. EW-2016-0313: that "focus should be
3 on efforts to actually reduce the amount of regulatory lag."⁵ It is apparent that Ms. Lyons
4 has not considered anything beyond what she sees as Staff's traditional method of
5 addressing rising costs in a rate case and not necessarily the goals and words included in
6 the Staff report to the Commission in the EW docket.

7 **Q: Does Ms. Lyons address similar concerns with transmission revenues?**

8 A: Yes. Both Company witnesses Don A. Frerking and John R. Carlson address
9 transmission revenues and some of the misconceptions. Additionally, to make it clear,
10 the Company is not asking for both the expense tracker and the revenue tracker
11 associated with transmission to stand independently, but instead the expenses and
12 revenues would be netted in the trackers. The reason for this is so that KCP&L will not
13 profit from the revenue tracker.

14 **Q: Ms. Lyons also proposes to treat increasing property taxes almost identically to her
15 proposed treatment on transmission revenues and expenses. How do you respond?**

16 A: I appreciate Ms. Lyons method of using January 1, 2017, plant as the basis for the
17 determination of property taxes to be paid in 2017. However she is not considering a
18 forecasted level of property taxes. I am still of the opinion that a tracker which uses a
19 two year forecast is more appropriate and will provide more sustainable recovery levels
20 beyond 2017.

⁵ See Staff Report- A Working Case to Consider Policies to Improve Electric Utility Regulation, File No. EW-2016-0313, October 17, 2016, pp. 69.

1 **Q: Have you read the rebuttal testimony of Staff witness Mark L. Oligschlaeger**
2 **regarding the Company's request for a tracker?**

3 A: Yes.

4 **Q: Would you describe your understanding of the position taken by Staff witness Mark**
5 **L. Oligschlaeger pertaining to the Company's request for a tracker mechanism.**

6 A: Mr. Oligschlaeger recommends that the Commission to reject the Company's request.
7 He takes the same position in this case as he did in KCP&L's last rate case, Case No. ER-
8 2014-0370. In both cases, he presents his opinion of what he believes constitute the basis
9 for an acceptable tracker and in what circumstances they should be employed.

10 **Q: How do you respond to his view of the use of trackers?**

11 A: While this is a recurring issue for several cases the Company has seen expenses for
12 transmission and property taxes far exceed the levels granted in rate cases and causing
13 significant lags in earnings. Using the examples in my rebuttal testimony for both
14 transmission and property taxes, the Company has seen a loss in revenues of nearly \$60
15 million over four years, simply due to those two factors. Those losses will never be made
16 up.

17 **Q: Have you read the rebuttal testimony of OPC witness Charles R. Hyneman?**

18 A: Yes.

1 **Q: On pages 13 and 14, Mr. Hyneman suggests the only time the Commission has ever**
2 **used projected costs in rate setting was when fuel costs were escalating at a very fast**
3 **and uncertain pace. Do you agree that this is the only time the Commission has**
4 **done so?**

5 A: No. During the construction of Iatan in 2005 through 2009, the Commission granted the
6 recovery of off-system sales margins on a projected basis and included in rates in the rate
7 cases during that period. In fact, similar to what the Company is requesting in this case,
8 the off-system sales were tracked and an asymmetrical tracker was used whereby if actual
9 off-system sales were less than that project, the difference was returned to customers.
10 However, if actual off-system sales were greater than projected, the Company absorbed
11 the difference. Tracking mechanisms have been used in a number of cases for rate-
12 making by this Commission. Examples include pensions, other post-employment
13 benefits and numerous expense items, where an amortization of an expense may be in
14 place are situations where trackers are used.

15 As Staff witness Mark Oligschlaeger addressed in his rebuttal testimony, when
16 new plants go into service and operations and maintenance costs are not known, the Staff
17 has supported the use of projected level of expenses and tracker mechanism to address
18 the ongoing operations until a history can be built of what to expect. An example of this
19 took place with the conclusion of Iatan 2 and the ongoing operations and maintenance
20 expenses. In this case the tracker was not asymmetrical, but allowed for full recovery,
21 whether it was above or below the amount included in rates. In that case, the Staff
22 supported inclusion projected operations and maintenance expense levels and established
23 a tracker mechanism.

1 **Q: Mr. Hyneman further states a concern about the accuracy of the projection. How**
2 **do you respond?**

3 A: While I agree that not all projections are accurate, the reason for the Company's proposal
4 is to protect both customers and the Company. By using an asymmetrical approach, the
5 Company will not recover more than the costs, but will be at risk if actuals are greater
6 than the projections.

7 **Q: Mr. Hyneman's third concern is that the expected increases at SPP will cease**
8 **sometime in 2018 and therefore it is unneeded. Do you agree with this position?**

9 A: No. In fact, that would make it more supportive, in that these cost increases are
10 reasonably expected to taper off in 2018. From my perspective, that would support
11 addressing these increases using projected costs and treating them in an asymmetrical
12 manner.

13 **Q: Mr. Hyneman goes on to say that transmission expenses are expected to decline**
14 **sometime after 2018 and regulatory lag will work in this manner to help support the**
15 **Company. How do you respond to his conclusion?**

16 A: Solving the problem of escalating costs by somehow waiting a few years with the
17 anticipation that it will come down does not address regulatory lag. It is my
18 understanding that the Commission cannot permit a utility to recover past losses by
19 allowing for recovery of those past expenses in future rates.

20 **Q: Mr. Hyneman discusses the example of the administrative fee that is lower in price**
21 **per kWh than it was in 2014. Does this make up for the \$44 million of unrecovered**
22 **transmission fees that the Company has experienced over the last four years?**

23 A: No. The administrative fee is a small cost in comparison to the other charges from SPP.

1 **Q: Mr. Hyneman provides an outline of the number of times the Company has**
2 **requested a regulatory mechanism to address transmission expenses. How do you**
3 **respond?**

4 A: I agree that the Company has asked on several occasions for recovery of transmission
5 expenses through various accounting mechanisms that this Commission has not allowed.
6 I think the history shows the need to address it today. The loss of \$44 million over 4
7 years in transmission expenses is clear and shows something needs to change in the
8 regulatory policy related to this issue. The Commission recognized the need to address
9 regulatory mechanisms and ordered a workshop to address alternatives to current
10 regulatory mechanisms. I believe the time has come to move to a more reasonable
11 regulatory practice and this is the right mechanism to address this issue.

12 **Q: Have you read the rebuttal testimony of MIEC witness James R. Dauphinais?**

13 A: Yes, particularly as he addresses both the Company's proposed use of projected
14 transmission expenses and revenues.

15 **Q: How do you respond to his position?**

16 A: Similar to the Staff's and OPC's position, Mr. Dauphinais opposes the use of projected
17 transmission expenses and revenues. He bases his opposition on the argument that using
18 projections somehow breaks the linkage or matching, or what Mr. Dauphinais calls
19 "synchronism", of revenues, expenses and rate base. I disagree with his position in that
20 no linkages will be broken. If projected transmission costs and revenues exceed the
21 actuals, the Company will be responsible to return the difference to its customers.
22 Likewise if costs and revenues are less than projected, customers will receive the benefit.

1 Q: Does that conclude your testimony?

2 A: Yes, it does.

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

In the Matter of Kansas City Power & Light)
Company's Request for Authority to Implement) Case No. ER-2016-0285
A General Rate Increase for Electric Service)

AFFIDAVIT OF TIM M. RUSH

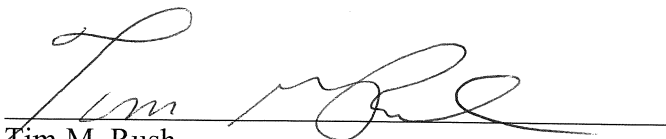
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

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.

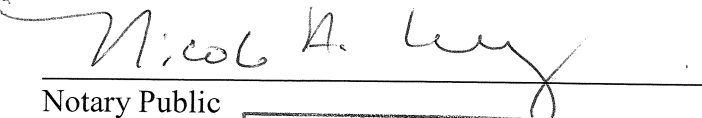
2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Kansas City Power & Light Company consisting of twenty-nine (29) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

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 27th day of January 2017.



Notary Public

My commission expires: Feb. 4, 2019

NICOLE A. WEHRY
Notary Public - Notary Seal
State of Missouri
Commissioned for Jackson County
My Commission Expires: February 04, 2019
Commission Number: 14391200

Customer Advisory Panel

Electric Vehicle Survey

Data Collection 11/2-11/9/2016



Kris McDaniel

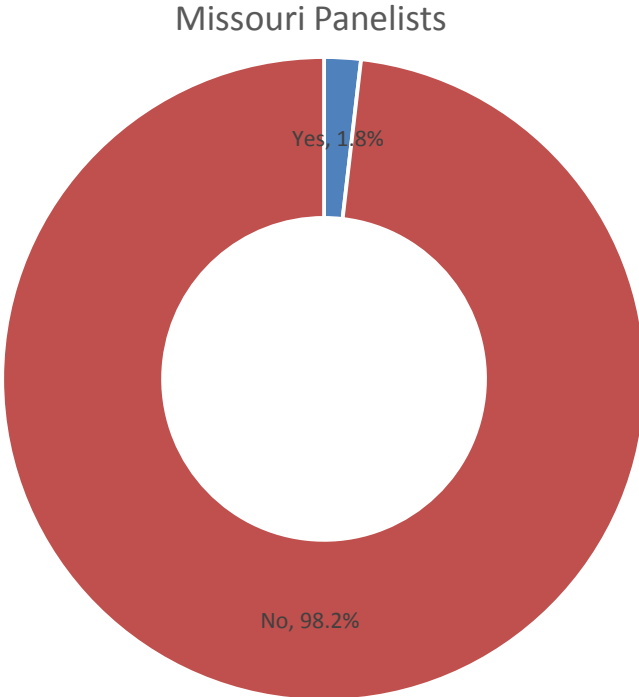
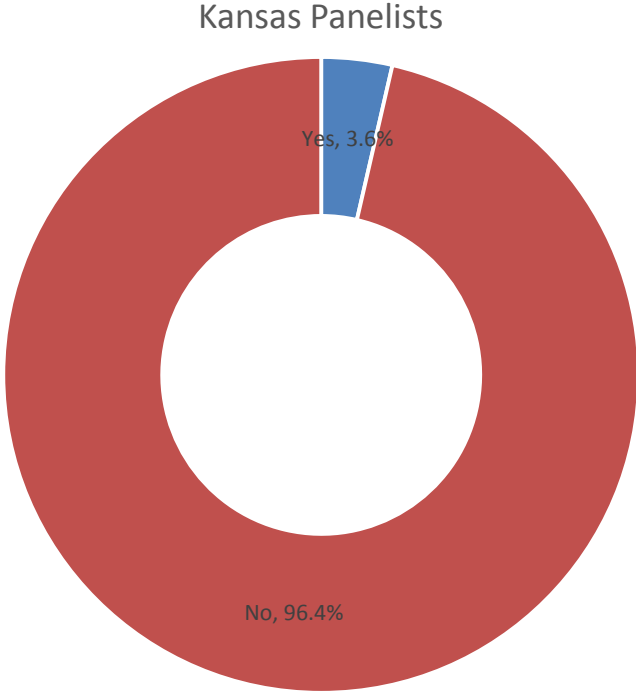
Market Research Analyst, Customer Insights

Summary

- Kansas residents are slightly more likely to drive electric vehicles compared to our Missouri customers
- Majority of panelists are interested in seeing the Clean Charge Network expanded
- The Clean Charge Network has a positive impact on the impression of KCP&L by panelists
- Those who own electric vehicles are more likely to be 25-64 years old, have a 4-year college degree or more, and have an income between \$40K - \$100K
- Those who are considering purchasing an electric vehicle are more likely to be 25-64 years old, have a 4-year college degree or more, and earn an income between \$40 - \$125K

Kansas Panelists are twice as likely to own or drive an electric vehicle compared to our Missouri panelists

Question: Do you currently own or lease an electric vehicle?



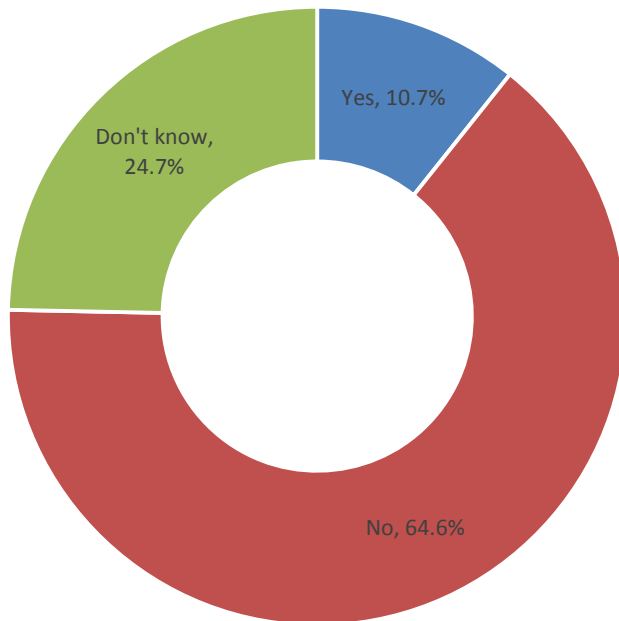
Those who own electric vehicles are:

- 35-64 years old,
- 4-year college degree or more,
- an income Between \$40K-\$100K

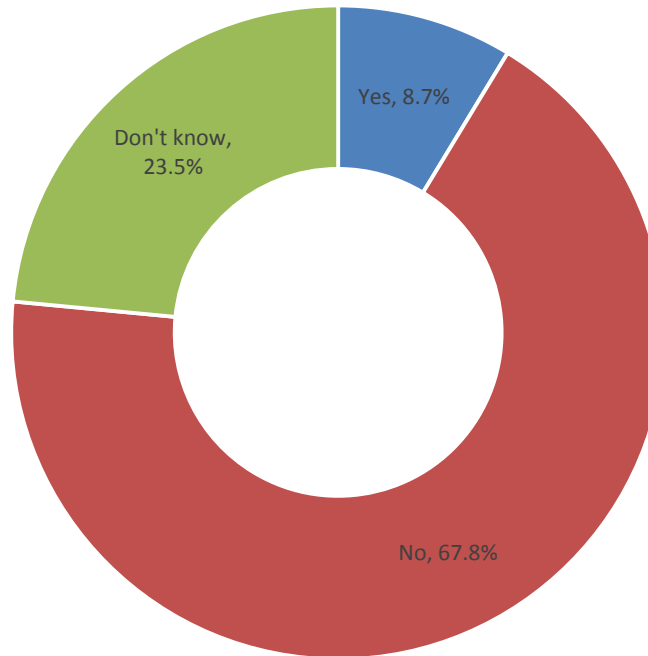
Kansas panelists are more likely to purchase an EV in the next 3 years compared to Missouri panelists

Question: Are you thinking of purchasing or leasing an electric vehicle in the next 3 years?

Kansas Panelists



Missouri Panelists



Those who are considering purchasing electric vehicles are:

- 25-64 years old,
- 4-year college degree or more,
- Income between \$40K-\$125K

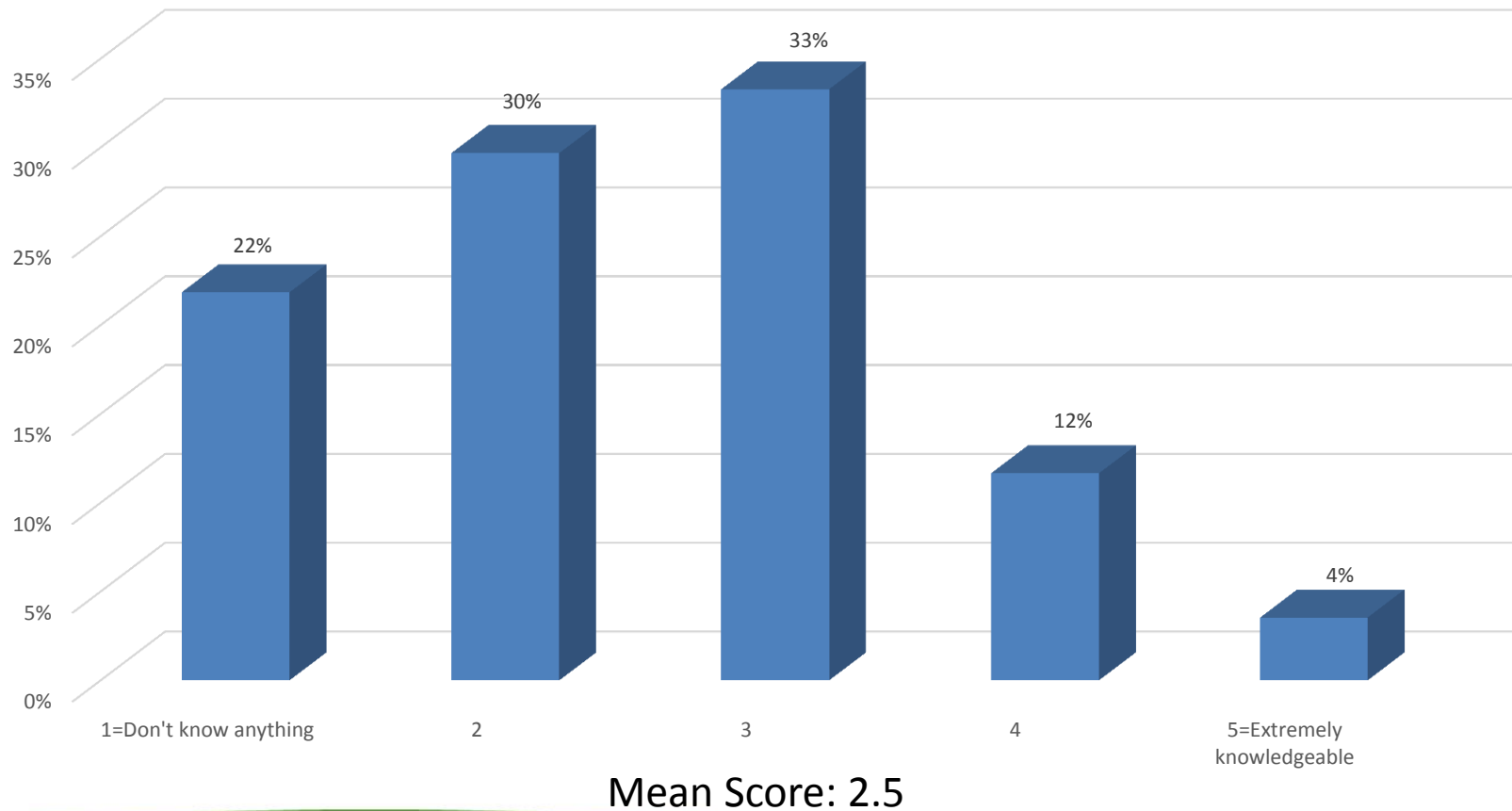
Of those panelists who have electric vehicles, 11 have Chevy Volts, 5 have Nissan Leafs, 4 Ford C-Max, and 3 Tesla's

Question: What type of electric vehicle do you drive?

- 2017 Chevy Volt
- Nissan Leaf
- 2013 Chevrolet Volt
- Volt
- Ford C-Max Energi
- Nissan Leaf
- Volt
- Nissan Leaf
- chevy volt
- Chevy Volt electric and gas
- Ford CMax Energi 2013
- 2015 Nissan Leaf
- Chevy volt
- 2014 chevy volt
- 2012 Ford Focus Electric
- Ford C-Max
- 2015 Tesla Model S
- 2016 Nissan LEAF SV
- Chevy Volt
- 2017 Chevrolet Volt
- Chevy Volt
- Tesla
- tesla model s

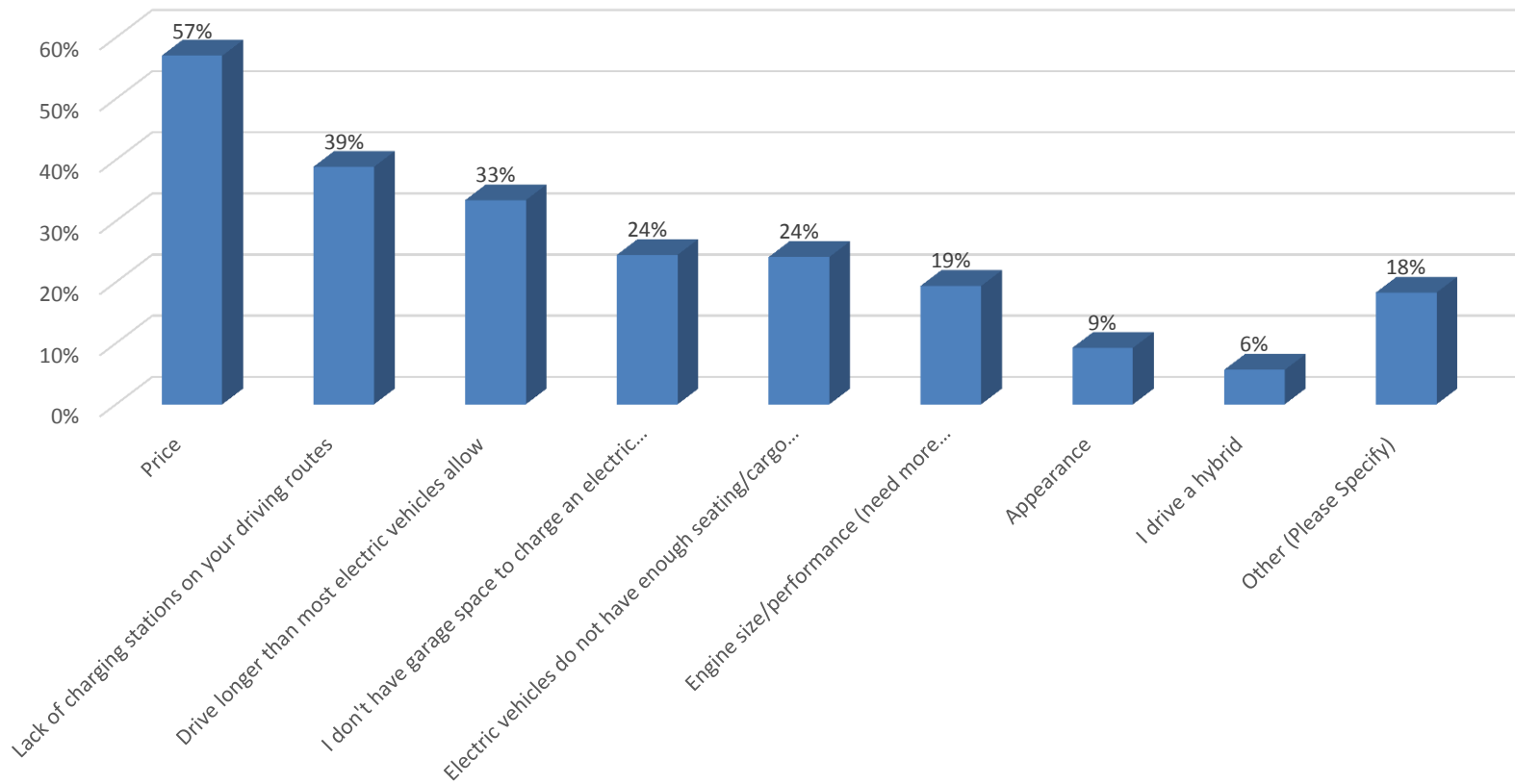
Panelists are somewhat knowledgeable regarding EVs

Question: How would you rate your knowledge of the electric vehicles that are available to purchase today?



Price and range anxiety continue to be the primary road blocks to purchasing an EV

Question: What are the things that are keeping you from owning an electric vehicle?



Majority of panelists wrote in that electric vehicles cost less than \$40K on average

Question: How much do you think electric vehicles cost on average?

Price of EV	%
Less than \$30K	25%
\$30-\$40K	54%
\$40-\$50K	6%
\$50-\$60K	9%
\$60-\$70K	2%
\$70-\$80K	1%
\$80-\$90K	1%
\$100-199K	0%
\$200K+	0%
Price compared to traditional	3%

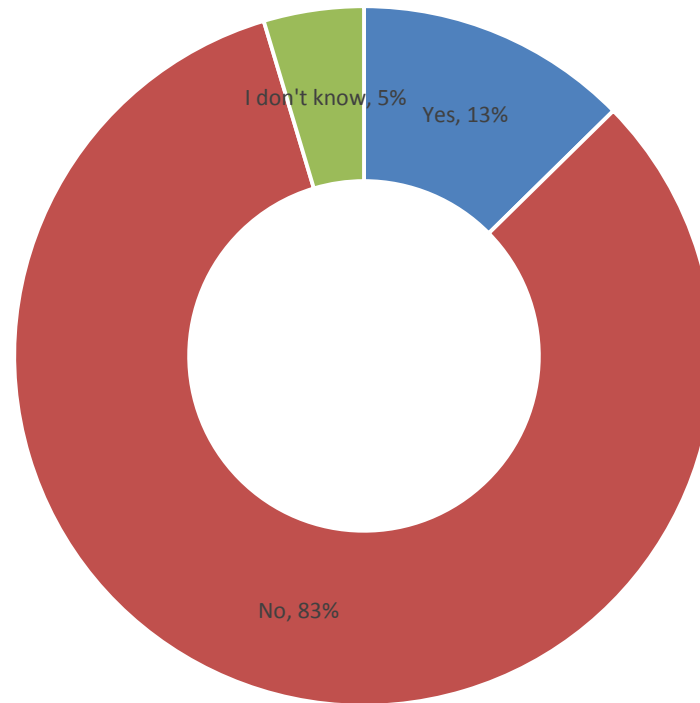
Majority of panelists wrote in that electric vehicles drive less than 150 miles per charge

Question: On average, what do you believe the driving range to be on an electric vehicle? How many miles do you think you can get per charge (i.e., full 'tank')?

Avg Range of EV	%
Less than 50 mi	10%
50-75 mi	17%
76-100 mi	19%
101-150 mi	18%
151-200 mi	19%
201-300 mi	13%
301-400 mi	2%
401+ mi	1%

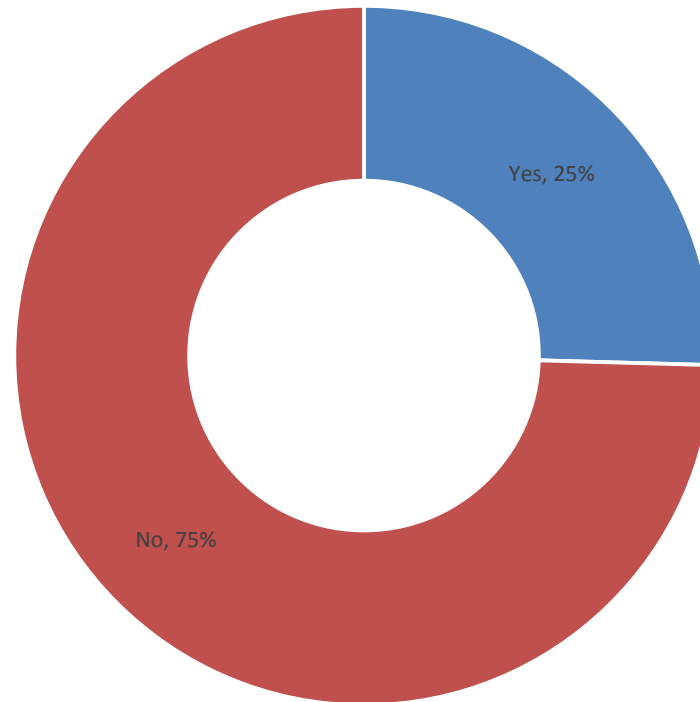
1 out of 10 panelists are aware of friends and family purchasing electric vehicles in the past 12 months

Question: Do you have any friends or family that have purchased or leased electric vehicles in the past 12 months?



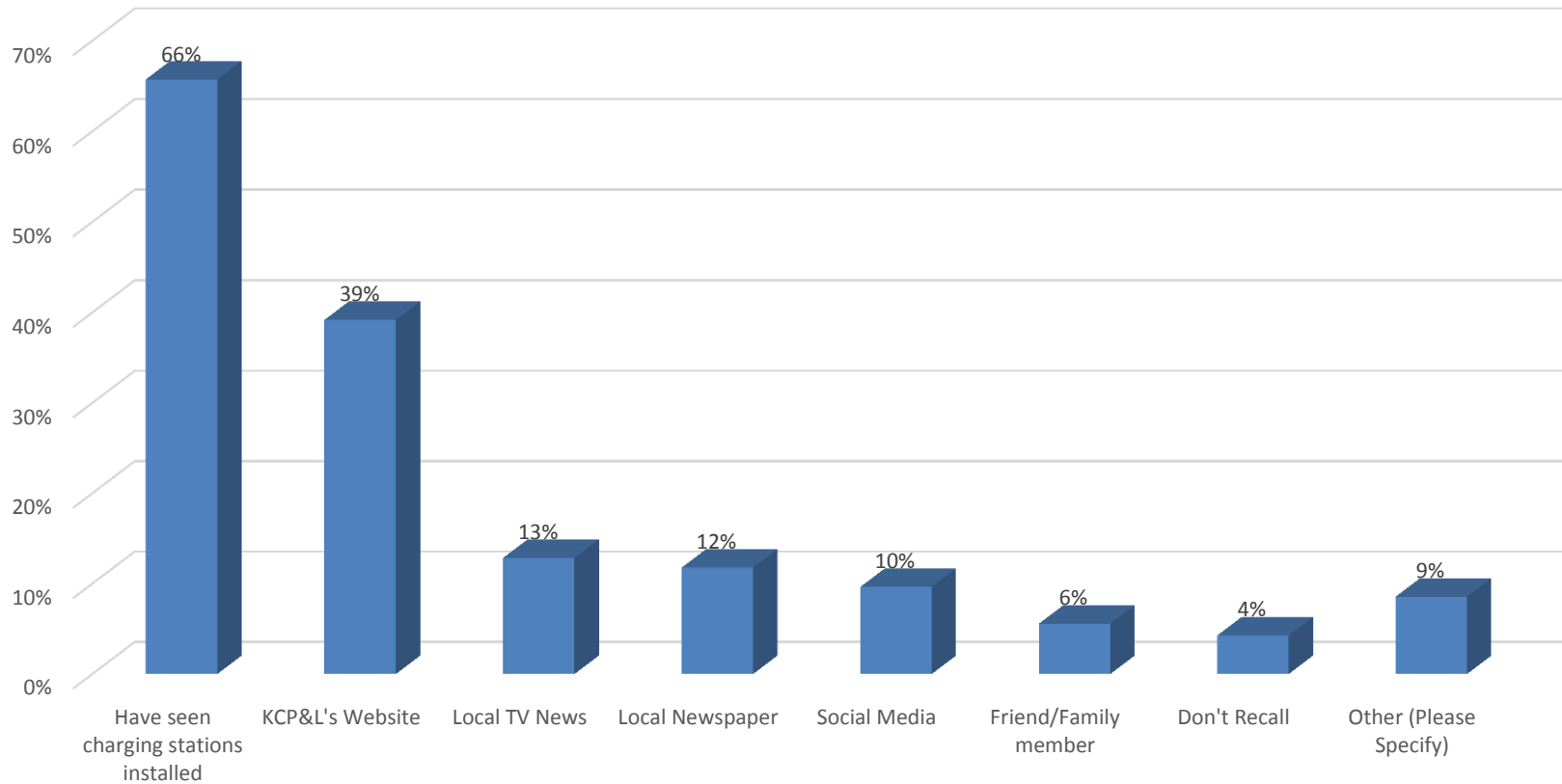
A fourth of panelists are currently aware of the Clean Charge Network

Question: Are you aware of KCP&L's Clean Charge Network?



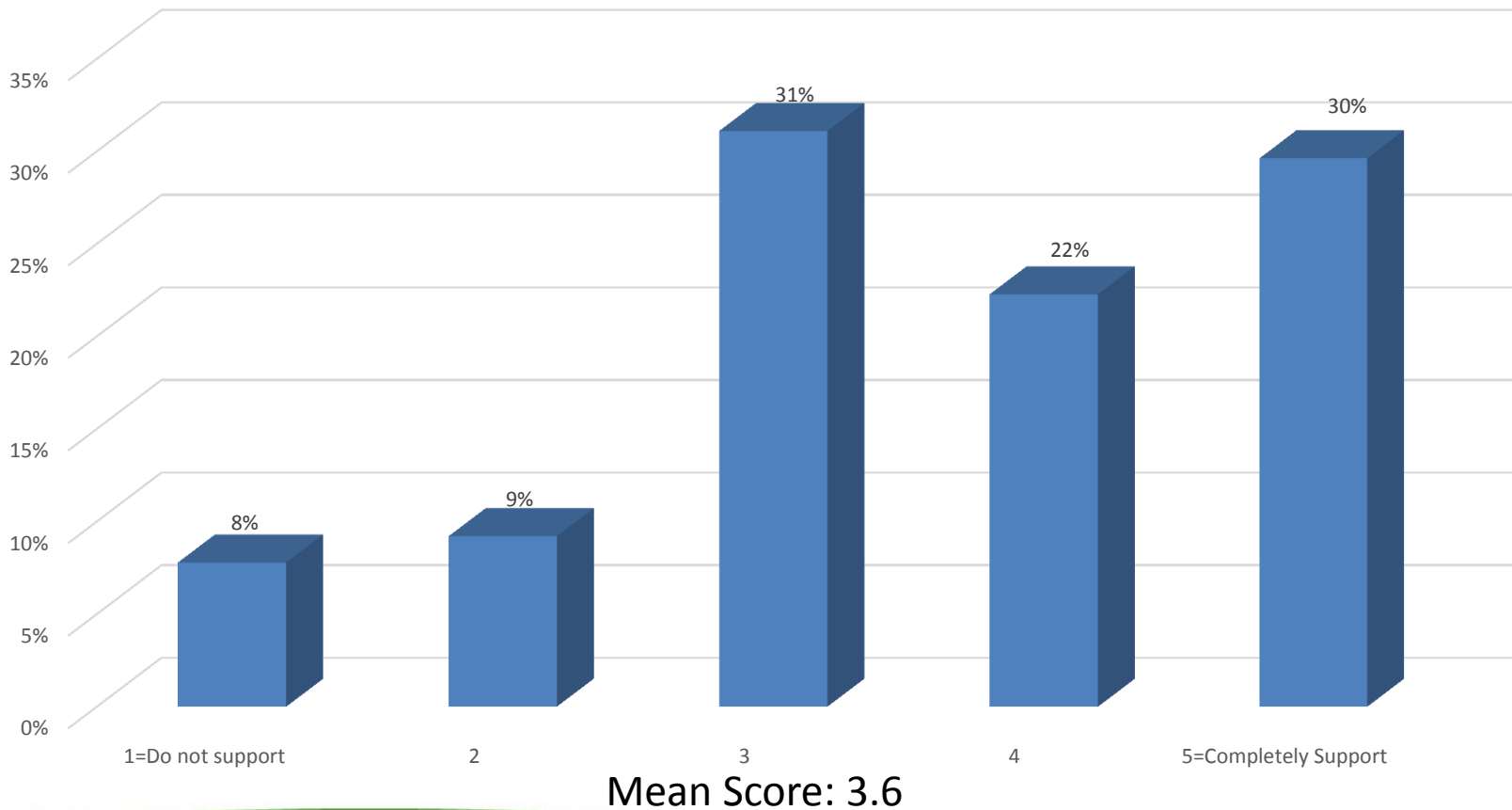
Of those that are aware of the Clean Charge Network, majority have seen the stations installed

Question: How did you hear about KCP&L's Clean Charge Network?



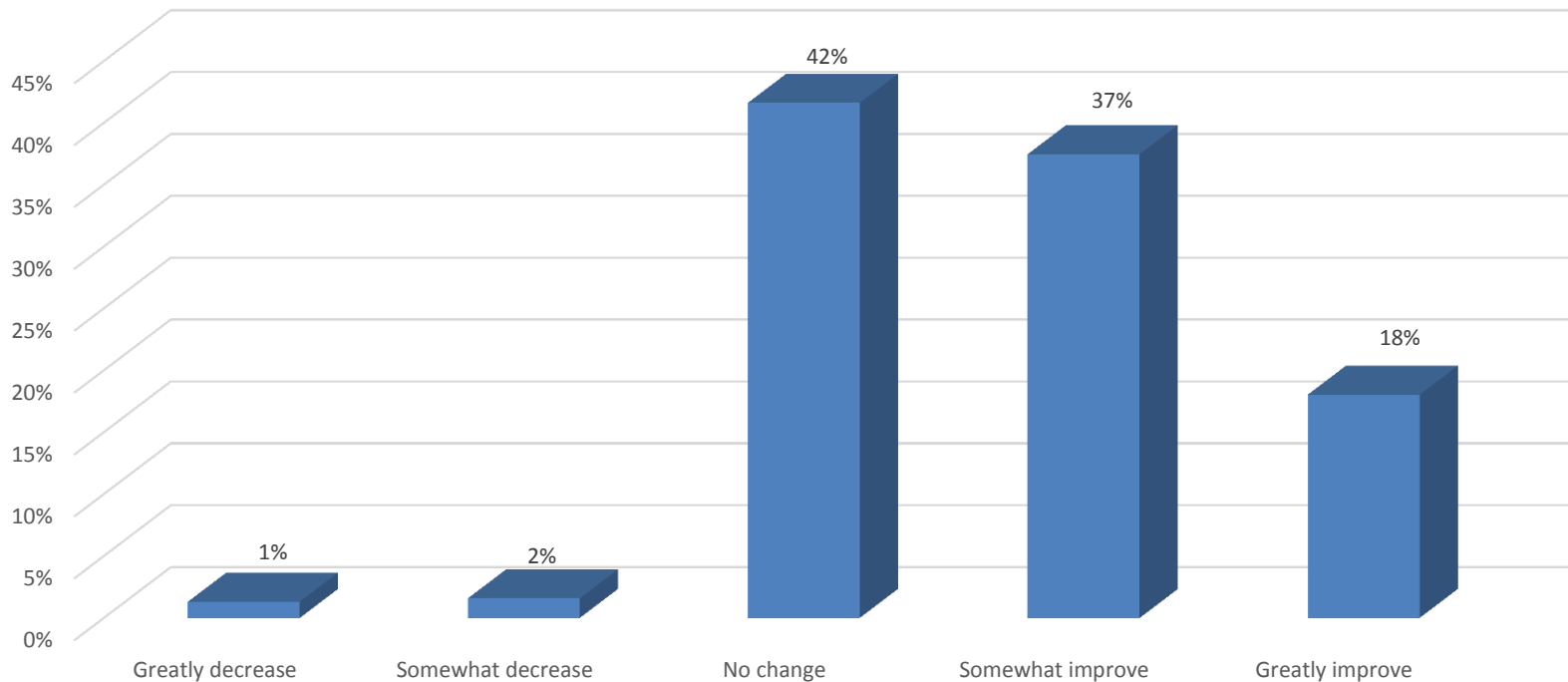
Panelists support expanding the charging station network

Question: Overall, how much do you support the idea of expanding electric vehicle usage and the infrastructure required to charge the electric vehicles?



The Clean Charge Network improves panelist's opinion of KCP&L

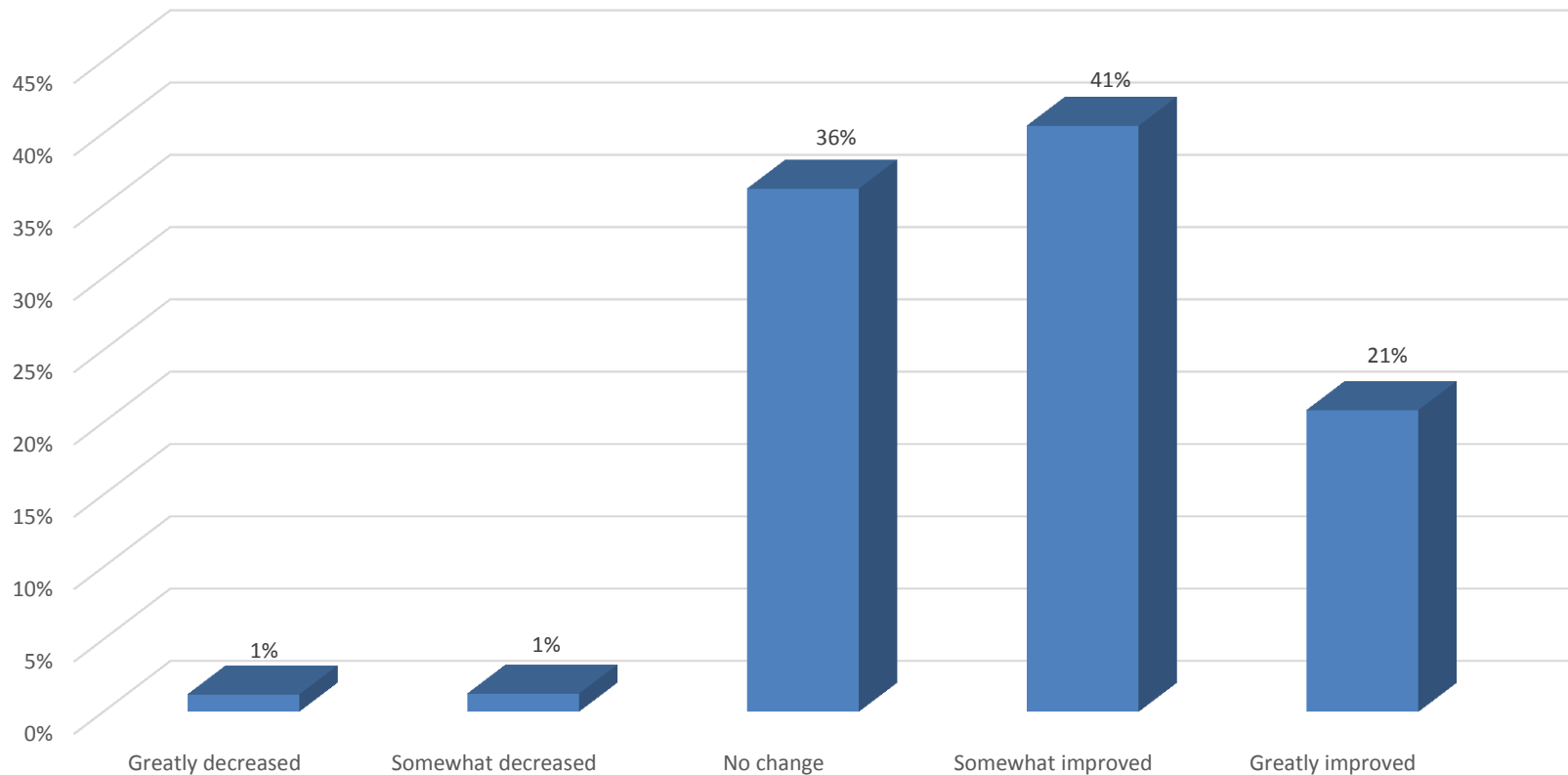
Question: KCP&L's Clean Charge Network is a ground-breaking electric vehicle charging network that will further KCP&L's leadership in environmental sustainability. As a leader in environmental sustainability, KCP&L is excited to announce a network of more than 1,000 electric vehicle charging stations across the region, the largest electric vehicle charging station installation by an electric utility in the United States. These charging stations are capable of supporting more than 10,000 electric vehicles. How does knowing about KCP&L's Clean Charge Network impact your feelings toward the company?



Mean Score: 3.7

Knowing KCP&L was one of the first utilities to build out a charging network improves the impression of KCP&L

Question: Knowing that KCP&L was one of the first electric companies to install charging stations for electric vehicles in the region, how does this impact your feelings toward KCP&L?

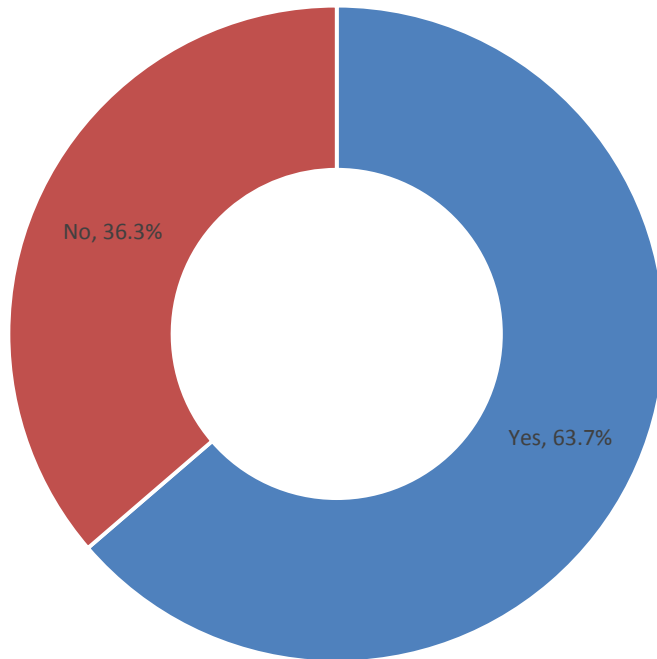


Mean Score: 3.8

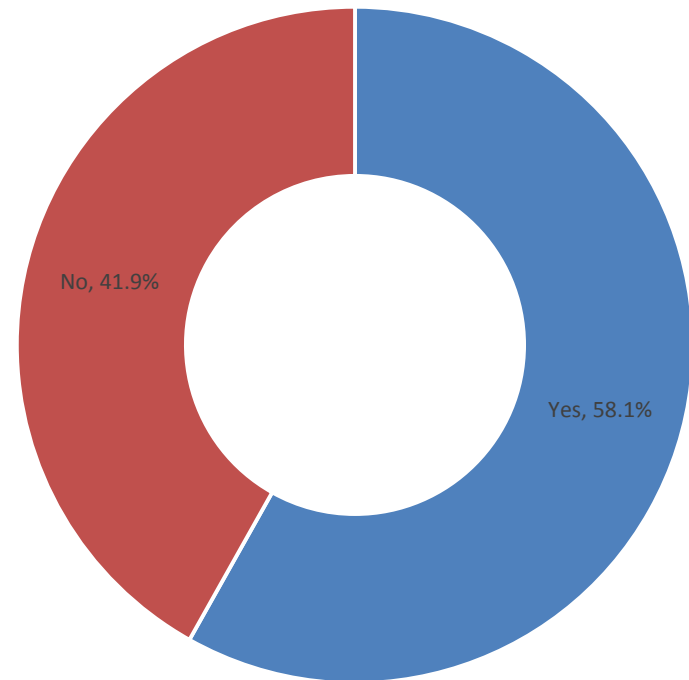
Kansas panelists are more aware of charging stations in their area

Question: Are you aware of any electric vehicle charging stations in **your** area?

Kansas Panelists



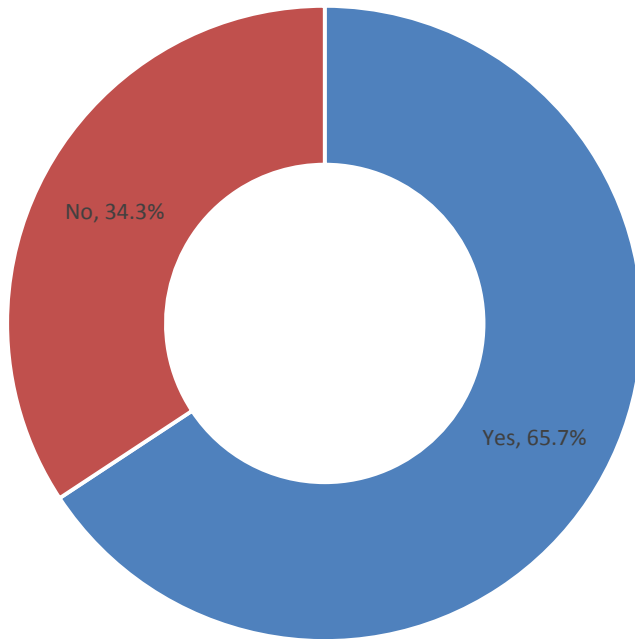
Missouri Panelists



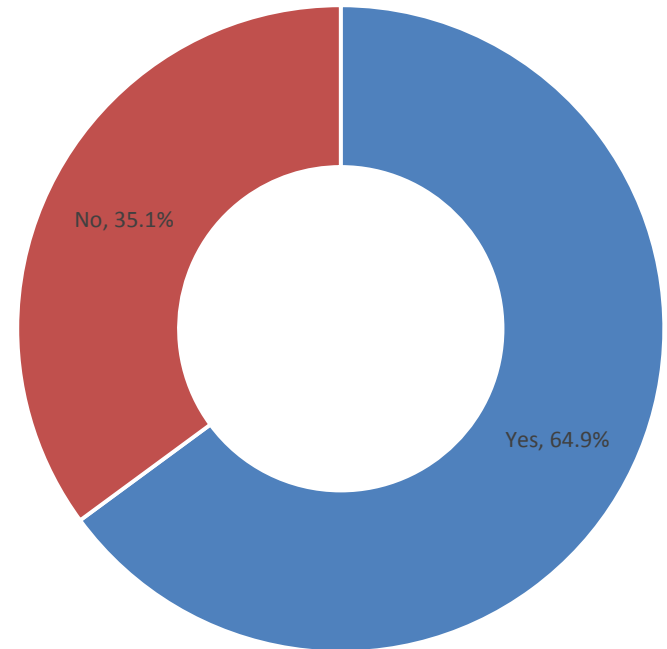
Kansas panelists are slightly more likely to want to see KCP&L expand the charging stations compared to MO

Question: Would you like to see KCP&L expand the number of charging stations in **your** area?

Kansas Panelists



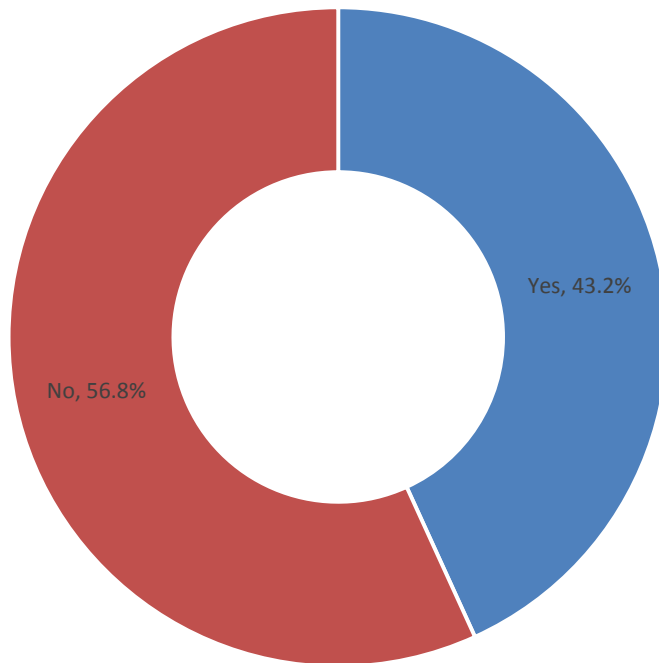
Missouri Panelists



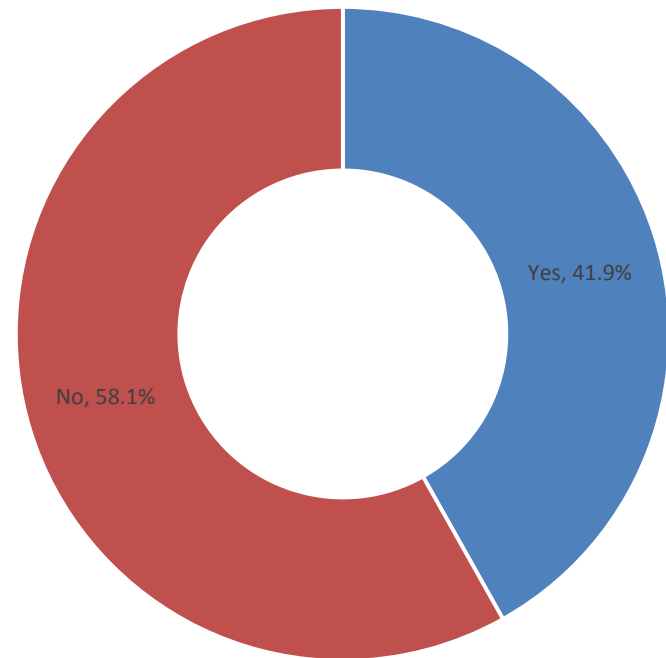
Two-fifths of panelists would consider purchasing an electric vehicle if there were more stations in their area

Question: If KCP&L expanded charging stations in your area, would you consider purchasing an electric vehicle?

Kansas Panelists

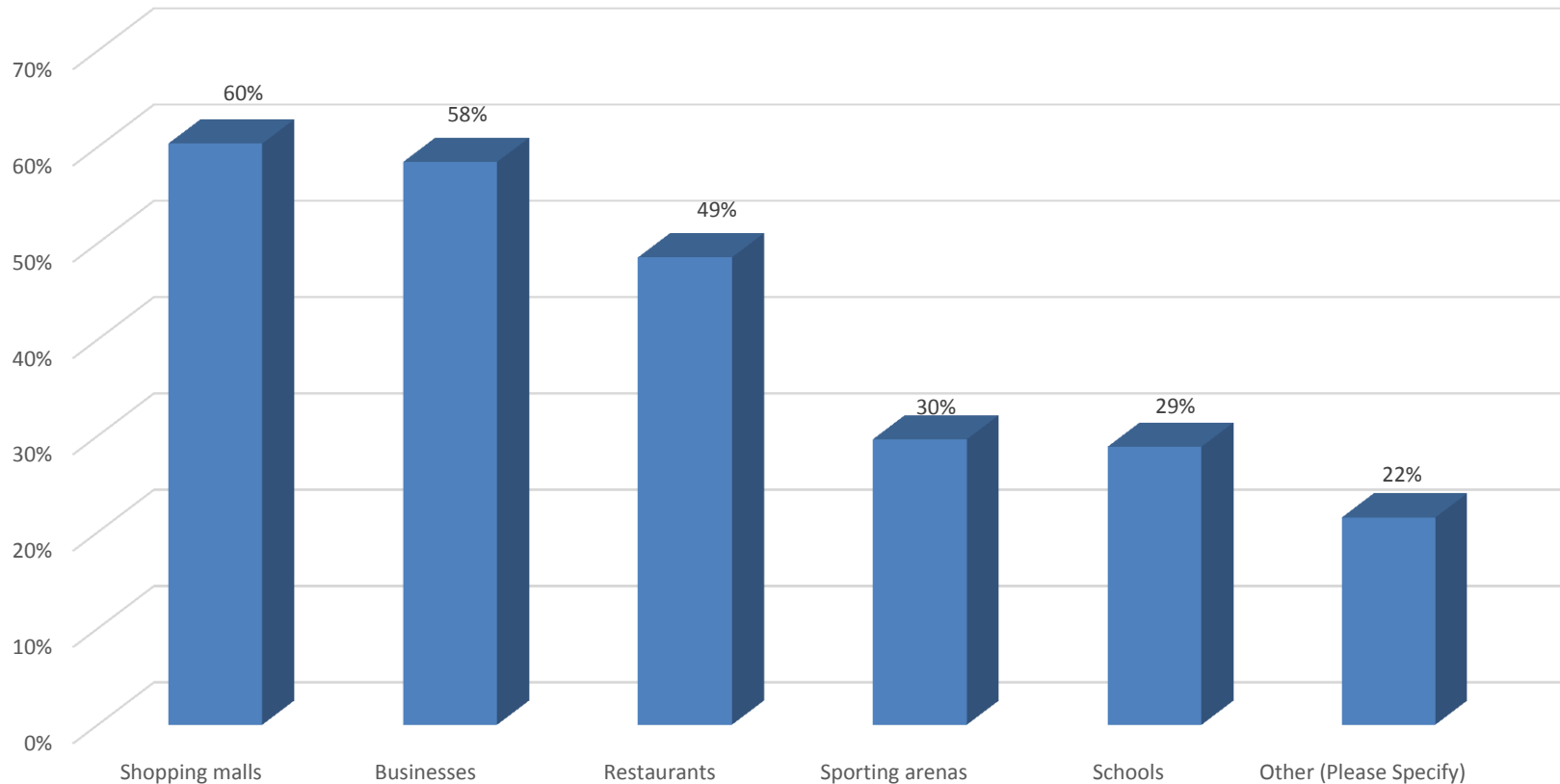


Missouri Panelists



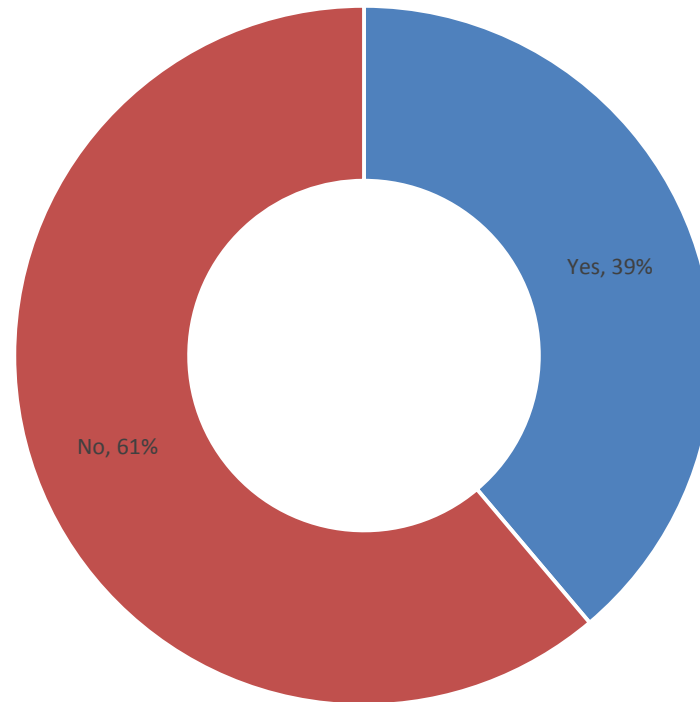
Panelists are interested in seeing charging stations installed in shopping areas and businesses

Question: Where would you like to see KCP&L locate the new electric vehicle charging stations?



Some panelists are willing to drive farther to shop at locations that offered charging stations

Question: Would you be willing to drive further to shop/visit a location that offered charging stations?



Panel Stats

- 1,836 panelists completed the survey, 16 started the survey but didn't complete it.
- The survey had a response rate of 54.43%, above our average of 40.81%

Study	Start Date	End Date	Invited	Completed	Response Rate
Q1 2016 Awareness	1/6/2016	1/13/2016	4,188	1,674	39.97%
Last Chance	1/20/2016	1/27/2016	1,297	22	1.70%
MEEIA Naming*	1/29/2016	2/3/2016	1,978	813	41.10%
MEEIA Program Name*	2/4/2016	2/9/2016	813	698	85.85%
Spring Storm	2/10/2016	2/17/2016	2,892	1,490	51.52%
MEEIA Naming - Audit Kit*	2/22/2016	2/26/2016	808	634	78.47%
MSAT	3/2/2016	3/9/2016	2,890	1,183	40.93%
Appliance Saturation	3/16/2016	3/23/2016	3,505	1,785	50.93%
Home Energy Efficiency	3/31/2016	4/7/2016	3,544	1,840	51.92%
KCP&L Connect	4/28/2016	5/4/2016	2,937	1,371	46.68%
Billing and Payments	5/12/2016	5/18/2016	3,499	1,628	46.53%
KEEIA	6/8/2016	6/15/2016	1,111	560	50.41%
Cooling Tips	6/22/2016	6/29/2016	3,462	1,685	48.67%
Q3 16 Awareness	7/6/2016	7/13/2016	3,438	1,628	47.35%
Last Chance	7/20/2016	7/27/2016	574	34	5.92%
Website Study	8/3/2016	8/10/2016	3,400	1,732	50.94%
Summer Heat	8/17/2016	8/24/2016	3,366	2,067	61.41%
Website Click Test 1	9/8/2016	9/21/2016	300	153	51.00%
EPRI Survey	9/28/2016	10/5/2016	3,386	1,744	51.51%
Message Testing	10/12/2016	10/19/2016	2,271	1,182	52.05%
Electric Vehicles	11/2/2016	11/9/2016	3,373	1,836	54.43%
Total			150,962	61,605	40.81%



Charging Station Revenue Requirement

KCP&L - MO True-Up

MO Situs Plant - Charging Stations at Dec 2016		4,978,178	
MO Juris - Accum Plant Reserve		(548,900)	
KCP&L Total ADIT	(3,076,211)		
MO Alloc	52.7400%	(1,622,394)	
Total Rate Base		<u>2,806,884</u>	
ROR		10.7237%	
Return On			<u>301,002</u>
Total Project O&M		325,739	
MO Alloc		55.2230%	
Total MO Juris Projected O&M			<u>179,883</u>
MO Projected Plant		4,978,178	
Depr Rate		10.0000%	
Total MO Juris Depreciation Expense			<u>497,818</u>
Alternate Refueling Property Tax Credit			
MO Juris - Tax Credit		(846,543)	
Tax Gross-up		1.6231	
			<u>(1,374,024)</u>
Total Estimated MO Revenue Requirement			<u><u>(395,322)</u></u>