

Exhibit No.:

*Issue(s): Greenwood Solar Allocations,
Staff Work Papers,
Lake Road Allocations,
Fuel Model Results*

Witness: Charles T. Poston, PE

Sponsoring Party: MoPSC Staff

*Type of Exhibit: Surrebuttal and
True-Up Direct Testimony*

*Case Nos.: ER-2018-0145 and
ER-2018-0146*

Date Testimony Prepared: September 4, 2018

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

ENGINEERING ANALYSIS DEPARTMENT

**SURREBUTTAL AND
TRUE-UP DIRECT TESTIMONY**

OF

CHARLES T. POSTON, PE

**KANSAS CITY POWER & LIGHT COMPANY
CASE NO. ER-2018-0145**

AND

**KCP&L GREATER MISSOURI OPERATIONS COMPANY
CASE NO. ER-2018-0146**

*Jefferson City, Missouri
September 2018*

1
2
3
4

**TABLE OF CONTENTS OF
SURREBUTTAL AND
TRUE-UP DIRECT TESTIMONY**

5
6

OF

CHARLES T. POSTON, PE

7
8

**KANSAS CITY POWER & LIGHT COMPANY
CASE NO. ER-2018-0145**

9

AND

10
11

**KCP&L GREATER MISSOURI OPERATIONS COMPANY
CASE NO. ER-2018-0146**

12 ALLOCATION OF ENERGY FROM GREENWOOD SOLAR (KCPL & GMO) 2

13 OPC'S USE OF STAFF WORKPAPERS IN TESTIMONY (GMO ONLY) 2

14 LAKE ROAD ALLOCATION FACTORS (GMO ONLY) 3

15 TRUE-UP VARIABLE FUEL & PURCHASED POWER EXPENSE (GMO ONLY) 4

16

1
2
**SURREBUTTAL AND
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3
4
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5
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**KCP&L GREATER MISSOURI OPERATIONS COMPANY
CASE NO. ER-2018-0146**

10 Q. Please state your name and business address.

11 A. My name is Charles T. Poston and my business address is Missouri Public
12 Service Commission ("Commission"), 200 Madison Street P.O. Box 360, Jefferson City,
13 Missouri 65102.

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

15 A. I am employed by the Commission as a Utility Regulatory Engineer I.

16 Q. Are you the same Charles T. Poston who, on July 27, 2018, filed
17 Rebuttal Testimony in Case Nos. ER-2018-0145 and ER-2018-0146?

18 A. Yes, I am.

19 Q. What is the purpose of your Surrebuttal Testimony?

20 A. The purpose of my Surrebuttal Testimony is to discuss Staff's allocation of
21 energy from the Greenwood Solar facility, to provide clarification of Staff's work paper used
22 in the Office of the Public Counsel's ("OPC") Rebuttal Testimony, and to offer Staff's
23 recommendation for allocation factors at the Lake Road Plant.

1 Q. What is the purpose of your True-Up Direct Testimony?

2 A. The purpose of my True-Up Direct Testimony is to provide an update to the
3 variable fuel and purchased power expense from Staff's production cost model for KCP&L
4 Greater Missouri Operations ("GMO").

5 **SURREBUTTAL TESTIMONY**

6 **ALLOCATION OF ENERGY FROM GREENWOOD SOLAR (KCPL & GMO)**

7 Q. GMO witness Mr. Tim M. Rush states in his Rebuttal Testimony that Staff
8 recommends that the energy produced at the Greenwood Solar facility be allocated 100% to
9 the customers of GMO. Does his statement accurately reflect how energy from the
10 Greenwood Solar facility is treated in Staff's production cost models?

11 A. No. In Staff's production cost models, 62.51% of the energy from the
12 Greenwood Solar facility is allocated to Kansas City Power and Light Company ("KCPL")
13 with the remaining 37.49% being allocated to GMO. These allocation factors are the same as
14 the customer-based allocation factors that Staff witness Karen Lyons presented in Staff's Cost
15 of Service Report. The use of a method to share costs between KCPL and GMO customers is
16 consistent with the Commission's order in the case that authorized the construction of the
17 Greenwood Solar facility.

18 **OPC'S USE OF STAFF WORKPAPERS IN TESTIMONY (GMO ONLY)**

19 Q. The Rebuttal Testimony of OPC witnesses Ms. Lena M. Mantle and
20 Mr. John A. Robinett provided confidential schedules LMM-R-3 and JAR-R-5C that
21 were described as "the summary sheet of Staff's fuel run results for its direct case" and
22 "the GMO fuel run summary sheet provided as a work paper by Staff supporting its fuel

1 expense in its direct case.” Are these schedules the same as the work paper that you provided
2 in support of your Direct Testimony?

3 A. Yes. However, it appears that some editing was done to my work paper prior
4 to its attachment to OPC’s testimony. Schedules LMM-R-3 and JAR-R-5C are not identical
5 to the work paper that I created. The schedules filed by OPC contain listings for two
6 additional power plants not owned or operated by either KCPL or GMO and that are not
7 present in my original work paper. Additionally, a section of my work paper that contained a
8 summary of fuel consumption and expense was omitted from the schedules filed by OPC.
9 Aside from those differences and some minor formatting changes, the remainder of my work
10 paper is the same.

11 **LAKE ROAD ALLOCATION FACTORS (GMO ONLY)**

12 Q. In Mr. Rush’s Rebuttal Testimony, he states that GMO has spent considerable
13 time discussing their proposed allocation methods with you during this case. Is this correct?

14 A. Yes. During the course of my review of the proposed Lake Road allocation
15 manual and supporting methods, I sent numerous data requests to GMO and was provided
16 responses to all of my questions. Additionally, I had the opportunity to speak with Mr. Rush
17 via telephone and in-person on several occasions in which I was able to ask questions related
18 to the Lake Road allocation factors. I have also had the chance to review both of the revisions
19 to the proposed Lake Road allocation procedures, and to provide feedback to GMO.

20 Q. Has your review of the proposed Lake Road allocation procedures and
21 their underlying methods caused you to change the recommendations that you made in your
22 Direct and Rebuttal Testimonies?

