

*Exhibit No.:*

*Issue(s):* *Renewable Energy  
Rider & Net Metering  
Investigation*

*Witness:* *Cedric E. Cunigan*

*Sponsoring Party:* *MoPSC Staff*

*Type of Exhibit:* *Surrebuttal 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 TESTIMONY**

**OF**

**CEDRIC E. CUNIGAN**

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

**AND**

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

*Jefferson City, Missouri  
September 2018*

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SURREBUTTAL TESTIMONY**

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RENEWABLE ENERGY RIDER..... 2

INVESTIGATION OF NET METERING AND EASY CONNECTION ACT  
COMPLIANCE..... 2



1 **RENEWABLE ENERGY RIDER**

2 Q. Does Staff have concerns with the modifications proposed in the Rebuttal  
3 Testimony of Bradley D. Lutz filed August 7, 2018?

4 A. Yes. Mr. Lutz states that the modifications “are believed to allow the program  
5 to be more appropriately tracked through the Company Fuel adjustment Clause (“FAC”).”<sup>1</sup>  
6 Staff objects to the unsubscribed portion of the resources being covered by ratepayers, and  
7 subsequently objects to the Power Purchase Agreements (“PPAs”) flowing through the FAC.  
8 The PPAs used for this program are not needed for generation capacity or RES compliance.  
9 They are specifically being entered into to provide a service to a subset of the customers. As  
10 such, the costs and benefits of these contracts should only be covered by the subscribing  
11 customers.

12 **INVESTIGATION OF NET METERING AND EASY CONNECTION ACT**  
13 **COMPLIANCE**

14 Q. Were you able to resolve the discrepancy mentioned in your rebuttal testimony  
15 between Data Request Responses 0450 and 0454?

16 A. Yes. In response to Data Request 0450 the receipt date was listed as  
17 11/28/2015, but in response to Data Request 0454, the receipt date was listed as 10/28/2015.  
18 Data Request 0450 was corrected to show a receipt date of 10/28/2015. This resulted in 1 of  
19 the 16 projects greater than 10 kW for US Sun Solar being in violation of Section  
20 386.890.7(1) RSMo.

21 Q. Do you have anything else to report?

22 A. Yes. In my rebuttal testimony, I provided a table titled Net Metering &  
23 Cogeneration Project Approval Times. This table contained data for both KCPL KS and

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<sup>1</sup> Page 12, Lines 3 -5 of the Rebuttal Testimony of Bradly D. Lutz filed August 7, 2018.

1 KCPL MO jurisdictions, which increased the number of violations reported. A corrected  
2 table showing only KCPL MO data is below. Should the Commission want Staff to  
3 investigate this matter further, Staff suggests that a general working docket be opened.

Count of Net Metering & Cogeneration Project Approval Time Violations			
Year	Company	>10 kW Past 90 Days	<10 kW Past 30 Days
2014	KCPL	5	22
	GMO	0	2
2015	KCPL	14	156
	GMO	4	27
2016	KCPL	2	57
	GMO	1	27
2017	KCPL	0	28
	GMO	3	27
2018	KCPL	0	23
	GMO	0	40

4

5 Q. Does this conclude your testimony?

6 A. Yes.

**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 a General Rate Increase for Electric Service ) ) Case No. ER-2018-0145 ) )  
and

In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service ) ) Case No. ER-2018-0146 ) )

**AFFIDAVIT OF CEDRIC E. CUNIGAN**

STATE OF MISSOURI ) )  
 ) ) ss.  
COUNTY OF COLE ) )

**COMES NOW CEDRIC E. CUNIGAN**, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal Testimony* and that the same is true and correct according to his best knowledge and belief.


Further the Affiant sayeth not.

  
\_\_\_\_\_  
**CEDRIC E. CUNIGAN**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 4<sup>th</sup> day of September, 2018.

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: December 12, 2020  
Commission Number: 12412070

  
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Notary Public