

Exhibit No.:
Issue(s): Revenue
Witness: Seoung Joun Won PhD
Sponsoring Party: MoPSC Staff
Type of Exhibit: True-Up Testimony
Case No.: ER-2016-0285
Date Testimony Prepared: March 1, 2017

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

OPERATIONAL ANALYSIS DEPARTMENT

ENGINEERING ANALYSIS UNIT

TRUE-UP DIRECT TESTIMONY

OF

SEOUNG JOUN WON PhD.

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2016-0285

Jefferson City, Missouri
March 2017

TRUE-UP DIRECT TESTIMONY

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6 Q. Please state your name and business address.

7 A. My name is Seoung Joun Won, and my business address is P.O. Box 360, 200
8 Madison Street, Jefferson City, MO 65102.

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

10 A. I am employed by the Missouri Public Service Commission (“Commission”) as a
11 Regulatory Economist III of the Tariff and Rate Design Unit of the Operation Analysis
12 Department, the Commission Staff Division.

13 Q. Are you the same Seoung Joun Won who has previously filed testimony in Staff’s
14 Revenue Requirement Cost of Service Report in this case?

15 A. Yes.

16 Q. What is the purpose of your true-up testimony?

17 A. The purpose of my testimony is to address the Commission Staff (“Staff”)’s
18 true-up energy efficiency adjustment for Kansas City Power & Light Company’s (“KCPL”) MEEIA Cycle 2 kWh savings.
19

20 Q. What adjustment did Staff make for MEEIA cycle 2 kWh savings?

21 A. Staff made a true-up energy efficiency adjustment consistent with paragraph
22 II.10.a.(i) of the Non-Unanimous Stipulation and Agreement Resolving MEEIA Filings

1 (“Cycle 2 Stipulation”) approved in Case. No. EO-2015-0240.¹ Staff annualized energy
2 efficiency kWh based on saving measures installed by the end of the true-up period, December
3 31, 2016, that were reported by KCPL in response to Staff’s data request No. 0391.1. Staff’s
4 witness Michael Stahlman used this information for making an adjustment to true-up billing
5 determinants consistent with paragraph II.10.b. of the Cycle 2 Stipulation.

6 Q. What other changes were made due to the energy efficiency adjustment?

7 A. Staff’s calculation of net system input and fuel and purchased power expense are
8 changed by the energy efficiency adjustment. Mr. Michael Stahlman determined the total true-up
9 kWh after making adjustments based on energy efficiency and other known and measurable
10 changes during the true-up period. I then used the true-up total kWh to calculate Staff’s net
11 system input. Staff Witness Charles Poston used the results of the net system input analysis for
12 his calculation of fuel and purchased power expense.

13 Q. Did Staff adjust hourly load shapes consistent with the Cycle 2 Stipulation?

14 A. No. Staff made no adjustment of hourly load shapes. According to the response to
15 Staff’s data request No. 0328, KCPL does not have hourly load shapes or marginal loss factors
16 for the MEEIA Cycle 2 programs. For more detailed information of the Cycle 2 Stipulation,
17 please see Staff witness Sarah Kliethermes’ true-up testimony. In addition, the impact of the
18 hourly load adjustment on fuel and purchased power expense will be addressed by Mr. Charles
19 Poston in his true-up testimony.

20 Q. Does that conclude your testimony?

21 A. Yes, it does.

¹ Kansas City Power & Light Company, P.S.C. MO. No. 7. Original Sheet Nos. 49K and 49L

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

AFFIDAVIT OF SEOUNG JOUN WON PhD

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW SEOUNG JOUN WON PhD, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing True-Up Direct Testimony; and that the same is true and correct according to his best knowledge and belief.

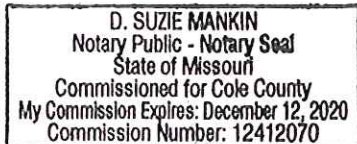
Further the Affiant sayeth not.

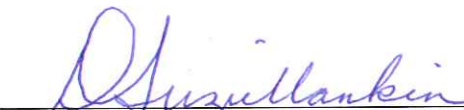


SEOUNG JOUN WON PhD

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 27th day of February, 2017.





Notary Public