

Exhibit No.:  
Issues: Revenue Requirement  
Witness: Seoung Joun Won, Ph.D.  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: True-up Direct Testimony  
Case No.: ER-2014-0370  
Date Testimony Prepared: July 7, 2015

**MISSOURI PUBLIC SERVICE COMMISSION**

**REGULATORY REVIEW DIVISION**

**TRUE-UP DIRECT TESTIMONY**

**OF**

**SEOUNG JOUN WON, Ph.D.**

**KANSAS CITY POWER & LIGHT COMPANY**

**CASE NO. ER-2014-0370**

*Jefferson City, Missouri  
July 2015*

**\*\* Denotes Highly Confidential Information \*\***

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**TRUE-UP DIRECT TESTIMONY**  
**OF**  
**SEOUNG JOUN WON, Ph.D.**  
**KANSAS CITY POWER & LIGHT COMPANY**  
**CASE NO. ER-2014-0370**  
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1 **ANNUALIZATION OF CUSTOMER CHANGES**

2 Q. Are there any known and measurable customer changes in the LPS class of  
3 KCPL during the true-up period?

4 A. Yes. According to KCPL's response to Data Request No. 0585, there is a new  
5 LPS customer who initiated service after the update period ending December 31, 2014, and  
6 during the true-up period of May 31, 2015.

7 Q. When did KCPL start providing service to the new customer?

8 A. According to KCPL's response to Data Request No. 0585, the service for the  
9 new customer started on February 28, 2015.

10 Q. Did Staff conduct a true-up revenue adjustment for the new customer?

11 A. Yes. Staff annualized the usage of the new customer and made the true-up  
12 revenue adjustment for the customer change.

13 Q. Did Staff obtain from KCPL its estimate of the prospective usage of the new  
14 customer?

15 A. Yes. In its response to Data Request No. 0585.1, KCPL provided its estimate  
16 which matches Staff annualized usage of the new customer. KCPL's response is attached as  
17 Schedule SJW-1.

18 Q. Are there any other known and measurable usage and revenue true-up changes  
19 for the LPS class?

20 A. No.

21 Q. Please summarize your true-up direct testimony.

1           A.     During the true-up period, there is a new customer who initiated service in the  
2 LPS class. Staff accounted for this annualization by increasing usage and revenues by  
3 approximately \*\* \_\_\_\_ \*\* million dollars.

4           Q.     Does the approximately additional \*\* \_\_\_\_ \*\* million dollars in the LPS class  
5 impact the Non-Unanimous Stipulation and Agreement on Certain Issues (“Agreement”)  
6 concerning Class Cost-of-Service and Rate Design?

7           A.     No. Staff continues to support the Agreement that the Commission should  
8 allocate any increase to the revenue requirement resulting from this case as an equal  
9 percentage increase to all classes.

10          Q.     Does this conclude your true-up direct testimony?

11          A.     Yes, it does.

**PR**

**Schedule SJW-1**

**Is Deemed**

**Highly Confidential**

**In Its Entirety**