

*Exhibit No.:* True-Up Adjustments  
*Issue:* True-Up Adjustments  
*Witness:* Kim Cox  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* 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**

**TARIFF / RATE DESIGN DEPARTMENT**

FILED  
October 23, 2018  
Data Center  
Missouri Public  
Service Commission

**TRUE-UP DIRECT TESTIMONY**

**OF**

**KIM COX**

**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*

*Staff* Exhibit No. 228  
Date 9-25-18 Reporter TR  
File No. ER 2018-0145 + 0146



1 **TRUE-UP ADJUSTMENTS**

2 Q. Did Staff make a true-up adjustment for EE?

3 A. Yes. Dr. Seoungjoun Won provided true-up EE adjustments based on  
4 cumulative kWh savings as of June 2018 of which Staff has accounted for in its true-up filing.  
5 The adjustment was performed in the workpapers "ER-2018-0146 GMO Revenues true-up"  
6 and "ER-2018-0145 KCP&L Revenues true-up."

7 Q. Do other witnesses for Staff discuss the EE adjustment?

8 A. Yes, Robin Kliethermes discusses the EE adjustment in her  
9 True-Up/Surrebuttal Testimony.

10 Q. At page 44 of the COS Report, Staff stated that it would review actual billing  
11 determinants for November 2017 through June 2018 and make any necessary adjustments  
12 once actual billing determinants are supplied. Have the actual billing determinants been  
13 supplied?

14 A. Yes, Staff received the actual billing determinants on July 31, 2018.

15 Q. Has Staff reviewed the information provided?

16 A. Yes. In reviewing the actual usage information for the time period of  
17 November 2017 – April 2018, it appears that Staff's direct-filed estimated usage for the SGS  
18 demand class and the LGS class is higher than the actual usage that is being experienced for  
19 the SGS demand class and the LGS class as it is currently constituted.

20 Q. Has Staff revised its estimated annualized usage for the SGS demand class and  
21 LGS class?

True-Up Direct Testimony of  
Kim Cox

1           A.     Yes, as it pertains to usage during the pre-consolidated months of  
2 November 2016 – April 2017. For these months, Staff applied an adjustment to the  
3 pre-consolidated monthly usage to account for post consolidation usage.

4           Q.     Is this an adjustment Staff would typically make in true-up?

5           A.     No. However, under the circumstances of this case, load research data is not  
6 available for the months of November 2017 – April 2018 for GMO and the load research data  
7 that is available for the months of November 2016 – April 2017 for GMO does not reflect the  
8 SGS demand class and LGS class as currently constituted, so an adjustment was made.

9           Q.     What is the difference between the GMO SGS demand class and the LGS class  
10 as constituted before and after April 2017?

11          A.     In April 2017, GMO introduced significant changes in rate design that caused  
12 movement of customers among classes. For the SGS demand class in particular, many  
13 customers moved down to the SGS non-demand class, but those customers had below-average  
14 usage. Meanwhile, a relatively small number of customers moved down to the SGS demand  
15 class from the LGS class, but the average usage of those customer far exceeded the otherwise  
16 average usage per customer of the SGS demand class.

17          Q.     Did Staff make a true-up growth adjustment?

18          A.     Yes. Ms. Antonija Nieto provided growth for the following KCPL  
19 classes: RES, SGS, MGS and LGS. Ms. Nieto also provided growth for the GMO  
20 residential class. These adjustments can be found in the same workpapers as the EE  
21 adjustments.

True-Up Direct Testimony of  
Kim Cox

1 Q. Did Staff make a true-up growth adjustment for the GMO SGS and LGS class?

2 A. Yes. Staff made a growth adjustment to the months of May 2017 through  
3 October 2017 by applying the June 2018 customer charge count to those months.

4 Q. Did Staff adjust for growth in the months of November 2016 through  
5 April 2017?

6 A. As noted earlier, Staff did not have consolidated billing determinants for these  
7 months and, therefore, used actuals from November 2017 through April 2018. The actual  
8 customer charges already take into account the growth that occurred that is known and  
9 measurable.

10 Q. Does this conclude your True-Up Direct Testimony?

11 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 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 KIM COX**

STATE OF MISSOURI    )  
                                  )    ss.  
COUNTY OF COLE     )

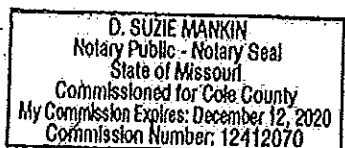
COMES NOW KIM COX and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *True-Up Direct Testimony* and that the same is true and correct according to her best knowledge and belief.

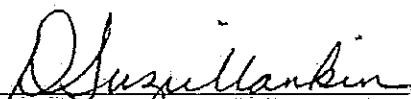
Further the Affiant sayeth not.

  
\_\_\_\_\_  
KIM COX

**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 30th day of August 2018.



  
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Notary Public