

Exhibit No.:	
Issues:	Demand Response Program
Witness:	James Owen
Sponsoring Party:	Renew Missouri Advocates
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**MISSOURI PUBLIC SERVICE COMMISSION**

**ER-2018-0145 / ER-2018-0146**

**SURREBUTTAL TESTIMONY**

**OF**

**JAMES OWEN**

**ON BEHALF OF**

**RENEW MISSOURI ADVOCATES**

September 4, 2018

*Renew mo* Exhibit No. 407  
Date 9-25-18 Reporter TU  
File No. ER-2018-0145 + 0146



1 **Q: Please state your name for the record.**

2 A: James Owen.

3 **Q: Are you the same James Owen who submitted rebuttal testimony on behalf of Renew**  
4 **Missouri Advocates (“Renew Missouri”) earlier in this case?**

5 A: Yes, I am.

6 **Q: Have your credentials changed since you last provided testimony?**

7 A: No, they have not.

8 **Q: For what purpose are you providing surrebuttal testimony in this matter?**

9 A: On behalf of Renew Missouri, I wish to respond to the rebuttal testimony submitted by  
10 Nicolas J. Papanastassiou on behalf of the Advanced Energy Management Alliance  
11 (“AEMA”).

12 **Q: Is there anything specific to Mr. Papanastassiou’s testimony that you seek to respond?**

13 A: Yes, specifically that Renew Missouri wishes to endorse the “Indiana model” tariff  
14 submitted by AEMA for the consideration of the Public Service Commission  
15 (“Commission”) to modify Kansas City Power & Light (“KCPL”) as well as KCPL’s  
16 Greater Missouri Operations (“GMO”) Demand Response Incentive Tariff. (Sometimes  
17 both KCPL and GMO might be referred to as “the Companies.”)

18 **Q: Does this mean you want the Commission to reject the recommendations of Renew**  
19 **Missouri in your rebuttal testimony?**

20 A: Not at all. Renew Missouri simply wants the Commission to know we support AEMA’s  
21 proposed tariff in addition to our proposals and that the Commission should consider all of  
22 these options in the Companies’ rate cases.

23 **Q: Do you believe the evidence AEMA employs in its supportive testimony is sound?**

1 A: Yes, they make a strong policy argument for their proposal and Renew Missouri supports  
2 that argument as well.

3 **Q: Do you believe the legal argument used by AEMA is consistent with Missouri law?**

4 A: Yes. As someone with background and training as an attorney, I am confident the  
5 Commission could follow AEMA's recommendations under the statutory directives given  
6 by the Missouri Legislature to the Commission.

7 **Q: It is your opinion that the recommendations of Renew Missouri and AEMA are**  
8 **consistent?**

9 A: Yes, to the extent they all can be considered by the Commission as the basis its decision  
10 on ordering these companies to develop a demand response program.

11 **Q: Is there any portion of their testimony with which you disagree?**

12 A: Yes. We respectfully disagree with Mr. Papanastassiou on his suggestion to consider this  
13 tariff as part of KCPL and GMO's upcoming Missouri Energy Efficiency Investment Act  
14 ("MEEIA") Cycle 3 filing.

15 **Q: Why do disagree with their position?**

16 A: Primarily, that MEEIA participation is entirely voluntary on the parts of the investor-owned  
17 utility. They are under no requirement – from statute or from order of the Commission – to  
18 propose any kind of program whatsoever in their MEEIA petitions. This is a concern  
19 Renew Missouri raised previously in its rebuttal testimony.

20 **Q: Why is this specific program at issue in these current cases?**

21 The Commission issued an Order for the Companies to propose tariffs that would allow for  
22 programs to enact an "Indiana model" tariff for implementing demand response. In this

1 same order, the PSC also asked KCPL and GMO to address specific legal and policy issues  
2 that would arise with the implementation of demand response.

3 **Q: Did this order make any reference to whether this issue should be addressed in the**  
4 **companies next MEEIA filing?**

5 A: No. It is clear the Commission wants this matter addressed in these current rate cases. This  
6 was a topic addressed by the investor-owned utilities, regulators, and other interested  
7 stakeholders in the Commission's Emerging Topics Workshop (EW-2017-0245) and  
8 clearly remains on the Commissioners' mind.

9 **Q: Regardless, you do support AEMA's proposed demand response tariff as attached to**  
10 **their testimony?**

11 A: Yes. Renew Missouri would like for this proposed tariff to be considered, as well as what  
12 Renew Missouri suggested, in this current matter and for the Commission to order the  
13 Companies to enact a demand response program.

14 **Q: Does this conclude your testimony?**

15 A: Yes.