

Exhibit No.:
Issue: Annualized/Normalized Revenues;
Witness: Marisol E. Miller
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Kansas City Power & Light Company
and KCP&L Greater Missouri
Operations Company
Case Nos.: ER-2018-0145 and ER-2018-0146
Date Testimony Prepared: July 27, 2018

MISSOURI PUBLIC SERVICE COMMISSION

CASE NOS.: ER-2018-0145 and ER-2018-0146

REBUTTAL TESTIMONY

OF

MARISOL E. MILLER

ON BEHALF OF

**KANSAS CITY POWER & LIGHT COMPANY and
KCP&L GREATER MISSOURI OPERATIONS**

**Kansas City, Missouri
July 2018**

KCP&L Exhibit No. 154
Date 9-25-18 Reporter TW
File No. ER-2018-0145 + 0146

REBUTTAL TESTIMONY

OF

MARISOL E. MILLER

Case Nos. ER-2018-0145 and ER-2018-0146

1 **Q: Please state your name and business address.**

2 A: My name is Marisol E. Miller. My business address is 1200 Main, Kansas City, Missouri
3 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Kansas City Power & Light Company (“KCP&L” or “Company”) as
6 Manager – Regulatory Affairs.

7 **Q: On whose behalf are you testifying?**

8 A: I am testifying on behalf of KCP&L and KCP&L Greater Missouri Operations Company
9 (“GMO”) (collectively, the “Company”).

10 **Q: Are you the same Marisol E. Miller who filed Direct Testimony in both ER-2018-
11 0145 and ER-2018-0146?**

12 A: Yes, I am.

13 **Q: What is the purpose of your testimony?**

14 A: The purpose of my testimony is to clarify differences between the Company calculated
15 annualized/normalized revenues and Missouri Public Service Commission (“Staff”)
16 calculated revenues prepared by witness Kim Cox.

1 November 23, 2015 filed in MO docket No. EO-2015-0241 and EO-2015-0240. That
2 agreement outlines the following:

3 c. Test period kW demand for each customer class will be adjusted by:

4 (i) Adding back the monthly kW demand savings by customer class
5 incurred during the test period from all active MEEIA programs,
6 excluding Home Energy Reports, Income Eligible Home Energy Reports
7 and Demand Response Incentive programs, determined using the same
8 methodology as described for kWh savings in Tariff Sheet 49K and 49L
9 (KCP&L) and in Tariff Sheet 138.4 and 138.5 (GMO) and then:

10 (ii) Subtracting the cumulative annual kW demand savings from the first
11 month of the test period through the month ending where actual results are
12 available (most likely two months prior to the true-up date) by customer
13 class from all active MEEIA programs, excluding Home Energy Reports,
14 Income-Eligible Home Energy Reports and Demand Response programs,
15 determined using the same methodology as described for kWh savings in
16 Tariff Sheet 49K and 49L (KCP&L) and in Tariff Sheet 138.4 and 138.5
17 (GMO).

18 This adjustment was not made to the billing demands in the test year, as required by the
19 MEEIA S&A. Similar language for an adjustment of energy usage is included in the
20 MEEIA S&A and these kWh were adjusted by MPSC Staff in the test year billing
21 determinants as appropriate. It's unclear as to why kWh were appropriately addressed
22 and kW were not addressed as outlined and required by the MEEIA S&A. As such,
23 estimated test year revenues were likely overstated. Additionally, there are concerns
24 regarding GMO revenues that may continue and become more pronounced in True-up.

25 **Q: Please elaborate on your GMO revenue concerns.**

26 A: My concern lies primarily in the GMO jurisdiction and the revenue impacts resulting
27 from the Staff's annualization of pre-consolidated billing determinants as described by
28 Company witness, Al Bass. Additionally, because it's unclear how the apparent
29 overstatement of determinants and revenues may be further change once updated
30 consolidated billing determinants through June of 2018 are available, the Company is

1 unable to fully size the differences it has with Staff's estimated revenues. Utilization of
2 consolidated billing determinants may be appropriate in this case, but depending on how
3 customer growth factors, weather normalization, etc. are applied to these consolidated
4 billing determinants, the resulting calculated revenues can vary significantly. It is the
5 Company's hope that discussion with Staff will more closely clarify or align current
6 differences and continued revenue concerns regarding will be resolved by True-up.

7 **Q: Have these issues been discussed with MPSC Staff?**

8 A: Yes.

9 **Q: Does that conclude your testimony?**

10 A: Yes, it does.

