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Issue: Net Metering and Solar  
Witness: Rebate Process  
Type of Exhibit: Drew Robinson  
Sponsoring Party: Surrebuttal Testimony  
Kansas City Power &  
Light Company,  
KCP&L Greater  
Missouri Operations  
Case Nos.: Company  
ER-2018-0145 and ER-  
Date Testimony Prepared: 2018-0146  
September 4, 2018

MISSOURI PUBLIC SERVICE COMMISSION

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

SURREBUTTAL TESTIMONY

OF

DREW ROBINSON

ON BEHALF OF

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

September 2018

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**SURREBUTTAL TESTIMONY**

**OF**

**DREW ROBINSON**

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

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**I. INTRODUCTION**

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

A: My name is Drew Robinson. My business address is 1200 Main Street, Kansas City, MO 64105.

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

A: I am employed by Kansas City Power & Light Company (“KCP&L”) and serve as Manager of Renewables for KCP&L and KCP&L Greater Missouri Operations Company (“GMO”) (collectively, the “Company”).

**Q: What are your responsibilities?**

A: I am responsible for a team that manages the Company’s regulated renewable product offerings. This includes the customer-owned generation programs Net Metering and Parallel Generation along with the proposed Renewable Rider and Shared Solar programs that have been proposed in this docket which will utilized utility-owned or sourced resources. I also participate in discussions regarding resource planning, marketplace strategy and Commission dockets as needed.

**Q: Please summarize your education, experience and employment history.**

A: I graduated from the University of Kansas with a Bachelor’s of Science in Mechanical Engineering in 2011 and from Rockhurst University in May of 2018 with a Master’s in

1 Business Administration with an emphasis in Finance. Following an internship with  
2 KCP&L in 2010, I was hired at the Montrose Generating Station as a Performance and  
3 Combustion Engineer in August of 2011 where I oversaw plant process efficiency and air  
4 quality control equipment. In July of 2014, I moved to the Regulatory Affairs department  
5 where my role as a Senior Analyst involved FERC jurisdictional  
6 interconnection/wholesale power agreements, State and Federal policy discussions, state  
7 tariff filings and serving on the Southwest Power Pool's Regional Tariff Working Group.  
8 I transferred into my current role as Manager of Renewables in July of 2017.

9 **Q: Have you previously testified before the Missouri Public Service Commission**  
10 **("Commission")?**

11 A: No.

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

13 A: I am testifying on behalf of KCP&L and GMO in this proceeding (collectively, the  
14 "Company").

15 **Q: What is the purpose of your testimony in this proceeding?**

16 A: The purpose of my testimony is to respond to Staff witness Cedric Cunigan's Rebuttal  
17 Testimony regarding Commissioner Rupp's order to Staff to investigate allegations made  
18 by Caleb Arthur, CEO of Sun Solar, regarding the timeliness of net metering  
19 interconnection application approvals.

20 **Q: Does KCP&L find the allegations to be well founded?**

21 A: No. As Staff witness Cunigan discussed in his rebuttal testimony only one Sun Solar  
22 project, out of seventeen, could be identified as having exceeded the 90-day window in

1 the Company's Missouri jurisdictions since 2015. On these projects, the Company  
2 averaged 24 days to complete each 10 kW and above project review.

3 **Q: Had Mr. Arthur previously contacted the Company regarding these allegations?**

4 A: Not to my knowledge.

5 **Q: Has the Company tried to contact Mr. Arthur?**

6 A: In initial follow up calls to Sun Solar following the Notice of Communication, I spoke to  
7 Sun Solar COO David Arthur and was later able to discuss the contents of the  
8 communication with him on August 22<sup>nd</sup> at the Missouri Energy & Environment  
9 Conference.

10 **Q: Staff Witness Cunigan's rebuttal testimony also mentioned other projects which he**  
11 **identified as exceeding the 90-day statutory timeline (10 kW and above systems).**  
12 **Have you been able to review these projects?**

13 A: Yes. As part of the review of 578 total projects (399 for KCP&L and 179 for GMO) we  
14 have more closely examined twenty-nine projects identified by Mr. Cunigan as having  
15 exceeded the pre-approval timeline for projects that are 10 kW or above in capacity. In  
16 follow-up conversations with Witness Cunigan, several Kansas projects were included in  
17 his original count and were not included in this Company review. Of the remaining  
18 projects, it appears that KCP&L caused the delay in five instances. Four of the five  
19 projects received no action within the 90-day timeline. This lack of response appears to  
20 have been caused by the Company not processing the application after it was received by  
21 email. All other projects included in the twenty-nine mentioned did receive a review with  
22 other issues identified as follows:

<i>Project Events</i>	<i>KCP&amp;L-MO</i>	<i>GMO</i>
Application/Design Flaw(s)	16	4
Customer-elected Redesign Following Initial Approval	0	2
Application Inactivity/Waiting on Clarification	1	0
Vision System Reporting Error	1	0
Company's Responsibility- Delay in Acting	4	1
<b>Total</b>	<b>22</b>	<b>7</b>

1 For KCP&L, there were a total of 399 projects that were reviewed in Staff's  
2 investigation. Of this total, four timeline violations were identified as being solely caused  
3 by KCP&L. For GMO, out of the 179 projects reviewed, only 1 was identified as being  
4 solely caused by GMO. Overall, in 5 out of 578 projects, or 0.86% (less than 1%) of  
5 projects above 10 kW in size, the delay was solely caused by the Company. Thus, over  
6 99% of 10kW applications were responded to by the Company within the statutory  
7 timeline.

8 **Q: Staff Witness Cunigan also provided totals for projects that were under 10 kW in**  
9 **capacity. How does the Company respond to that list?**

10 **A:** The Company acknowledges that we have had instances of not meeting the timelines as  
11 directed. Differing from Witness Cunigan's numbers, the Company identified 109  
12 projects from 2017 and 2018 in its Missouri territories that had exceeded the 30-day  
13 timeline. Of those projects, Company found one common issue: the timeline to initially  
14 review projects was being calculated based upon the application created date instead of  
15 the application received date. This was allowing a timeline of up to 40 days to review  
16 instead of the 30-day requirement. Of the 109 projects, 63 of them were due to this issue.

17 Other project approval issues are as follows:

<i>Project Events</i>	<i>KCP&amp;L-MO</i>	<i>GMO</i>
Application/Design Flaw(s)	17	15
Company's Responsibility - App. Creation Discrepancy	22	41
Company's Responsibility - Delay in Acting	7	7
<b>Total</b>	<b>46</b>	<b>63</b>

1 **Q: Has the Company provided project timelines to Staff in the past?**

2 A: Yes. The Company has provided updated project numbers to Staff monthly while solar  
3 rebate funds were available and upon request.

4 **Q: Please describe the Company's approval process for net metering interconnection  
5 applications.**

6 A: Upon receipt of a net metering interconnection application, the Company reviews the  
7 accuracy of the information received to ensure that all proper documentation has been  
8 provided by either the customer's chosen installer or by the customer who intends to  
9 proceed as a self-installer. Upon initial acceptance and initial receipt approval, the  
10 Company performs an engineering review of the system which covers the size, design,  
11 physical interconnection and equipment that the proposed system would utilize. If  
12 approved, the customer may choose to have a pre-inspection performed at the site of the  
13 installation to aid in identifying any issues that may hinder the future post-inspection and  
14 meter swap. Following the completion of the system install, the Company will perform a  
15 post inspection to verify the system was installed as approved. Once a customer passes a  
16 post inspection, their meter is scheduled to be swap and they begin participation under a  
17 net metering rate design.

18 **Q: What issues can lead to a project not being approved with a 30 or 90-day window?**

19 A: The approval timeline can be impacted both by the filing party and by the Company.  
20 Issues can include, but are not limited to, system design flaws, application information

1           flaws, redesigns, Company failure to act and the volume of applications. The Company  
2           continues to make process improvements to the application review process.

3   **Q:   With the upcoming Solar Rebate Program approved in Senate Bill 564, what**  
4           **changes has the Company made to its net metered interconnection application**  
5           **review?**

6   A:   Prior to the passage of SB 564, the Company was already making strides to create a  
7           quicker review process. The Company is working with AEG, who supplies our Vision  
8           DSM software, to make an external portal available to applicants. This portal will  
9           facilitate online applications, consolidate documents submittals, provide project status  
10          and allow for communication between customer-generators/installers and the Company.  
11          The Company has been using Vision DSM since late 2014 to facilitate and report out on  
12          projects that are submitted under the Net Metering tariffs and the now-finished solar  
13          rebate stipulation. Educating customers on the timeline associated with their installation  
14          will increase transparency and set expectations as Customers occasionally reach out when  
15          the timeline associated with a system install does not correspond to the Company's  
16          approved timeline procedures. As such, the Company will work to do a better job in  
17          informing customers that our timeline includes many variables and providing them the  
18          tools to ask the right questions to their installers. And finally, the Company has trained  
19          additional resources to support the expected application volume for solar rebates and for  
20          continued support of the net metering program once the rebate program is complete.

21   **Q:   Would you please summarize your surrebuttal testimony?**

22   A:   The Company's review of net metering interconnection applications demonstrates that it  
23          has a good track record of meeting the statutory deadlines for the processing of such

1 applications. As such, I do not believe this topic warrants any further Commission action  
2 at this time.

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

4 **A: Yes, it does.**

