

FILED
March 2, 2017
Data Center
Missouri Public
Service Commission

Exhibit No.: 227
Issue(s): Fuel Adjustment Clause
Witness: David C. Roos
Sponsoring Party: MoPSC Staff
Type of Exhibit: Surrebuttal Testimony
Case No.: ER-2016-0285
Date Testimony Prepared: January 27, 2017

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

ENERGY RESOURCES DEPARTMENT

SURREBUTTAL TESTIMONY

OF

DAVID C. ROOS

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2016-0285

*Jefferson City, Missouri
January 2017*

Staff Exhibit No. 227
Date 2/22/17 Reporter ML
File No. ER 2016-0285

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KANSAS CITY POWER & LIGHT COMPANY

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1 which he discusses the unwinding of KCPL's natural gas fuel and natural gas to cross-hedge
2 purchased power hedging activities.

3 **STAFF'S RECOMMENDATIONS REGARDING KCPL'S EXISTING FAC**

4 Q. Starting on page 20, lines 1 through 3, Ms. Mantle expresses her concern that
5 Staff does not specifically identify whether Staff is requesting the Commission to modify
6 KCPL's current FAC or the FAC KCPL proposed in this case. Can you clarify?

7 A. Yes. In the *Staff Report Revenue Requirement Cost of Service*, Staff is
8 requesting modification to KCPL's **current** FAC.

9 **FUEL AND CROSS-HEDGING IN THE FAC**

10 Q. On page 20, lines 3 – 10, of his rebuttal testimony, Mr. Rush discusses
11 alternative approaches for FAC tariff sheet language to provide for the reinstatement of natural
12 gas fuel hedging in the future should such an action be warranted due to changes in the energy
13 market. Mr. Rush then expresses KCPL's willingness to agree with Staff's recommendation
14 to mimic the outcome of Case No. ER-2016-0156 where after notifying the parties, KCPL can
15 begin a new hedging program and defer the costs in a regulatory asset (or liability) until its
16 next rate case. Is this consistent with Staff's recommendation?

17 A. Yes.

18 Q. Does this conclude your surrebuttal testimony?

19 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-2016-0285

AFFIDAVIT OF DAVID C. ROOS

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW DAVID C. ROOS and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Surrebuttal Testimony; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

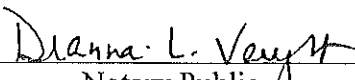


DAVID C. ROOS

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 24th day of January, 2017.

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 28, 2019 Commission Number: 15207377



Notary Public