

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Kansas)
City Power & Light Company for Authority to) **File No. ER-2018-0145**
Implement a General Rate Increase for)
Electric Service)

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for) **File No. ER-2018-0146**
Authority to Implement a General Rate)
Increase for Electric Service)

**REVISED LIST OF ISSUES, ORDER OF WITNESSES, ORDER OF
CROSS-EXAMINATION AND ORDER OF OPENING STATEMENTS**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and states:

In preparing this list of issues Staff has solicited input from the parties, attempted to list all the issues, and attempted to obtain consensus on the descriptions of the issues. This is Staff’s best effort to list and describe all the issues in this case. To the extent errors in issues or listed witnesses are discovered, the Commission will be advised as soon as possible. All parties do not agree that the issues listed herein are actually issues in this case. In order to prevent the need for filing multiple lists of issues, the parties have agreed to include all issues whether agreed to by opposing parties.

The parties for Case No. ER-2018-0145 are:

- AEMA—Advanced Energy Management Alliance
- DE—Missouri Division of Energy
- KCPL—Kansas City Power & Light Company
- MECG—Midwest Energy Consumers Group
- MIEC—Missouri Industrial Energy Consumers
- MJMEUC—Missouri Joint Municipal Electric Utility Commission
- OPC—The Office of the Public Counsel
- Renew Missouri
- Staff

The parties for Case No. ER-2018-0146 are:

AEMA—Advanced Energy Management Alliance
DE—Missouri Division of Energy
Dogwood Energy, LLC
GMO—KCP&L Greater Missouri Operations Company
MECG—Midwest Energy Consumers Group
MIEC—Missouri Industrial Energy Consumers
MJMEUC-Missouri Joint Municipal Electric Utility Commission
OPC—The Office of the Public Counsel
Renew Missouri
Staff

LIST OF ISSUES

I. Commission Raised Issues

- a. Staff’s Investigation into KCPL’s and GMO’s Review and Response Time Regarding the Approval of Net Metering and Solar Rebate Applications for systems Over 10kW.
- b. KCPL and GMO Line Extension Issue.

II. Load Research – Should the Commission order KCPL and GMO to utilize AMI metering to improve the quality of hourly load information available in future cases?

III. Rate Design/Class Cost of Service

- a. **CCOS**
 - i. What revenue neutral changes to class revenue responsibility, if any, should the Commission order for each utility?
- b. **Residential Rate Design**
 - i. What residential rate design should be ordered for each utility?
 - ii. What residential customer charges should be ordered for each utility?

- iii. Should KCPL's residential rate schedules be simplified and consolidated as recommended by Staff?
 - iv. Should the Commission order implementation of KCPL's and GMO's proposed Time of Use Pilots? If so, how?
- c. **Non-Residential Rate Design**
- i. What Rate Designs should be ordered for each utility's non-residential classes?

IV. Tariffs

- a. **Restoration Charge** – Should a restoration charge be added to each utility's tariffs as requested by KCPL and GMO?
- b. **Special Contracts** – Should each utility's special contract tariffs be revised as proposed by KCPL and GMO?
- c. **Real Time Pricing** – Should the Commission eliminate or unfreeze each utility's Real Time Pricing tariffs?
- d. **Other Studies** – Should the Commission order KCPL and GMO to complete the studies recommended by Staff, including (1) seasonal rates; (2) alignment of billing seasons between utilities; (3) study and retention of billing determinants to develop more complex rate designs including but not limited to coincident peak demand; and (4) development and recording of facility extensions by customer and/or class?
- e. **Under-Utilized Infrastructure Tariff** – Should the Commission adopt the under-utilized infrastructure tariff proposed by KCP&L and GMO?

V. Riders

- a. Renewable Energy Rider** – Should the Commission order implementation of a renewable energy rider for each utility? If so, should the unsubscribed energy flow through each utility’s FAC, or should any other recommendations made by parties be adopted?
- b. Solar Subscription Rider** – Should the Commission order the implementation of a solar subscription rider for each utility? If yes, should the Commission order the adoption of any other recommendations made by parties?
- c. Standby Rider** – Should the Commission order changes to each utility’s Standby Rider tariff, as recommended by the Division of Energy?

VI. Indiana Model – Should the Commission order each utility’s Demand Response Incentive Tariff be modified to incorporate the Indiana Model, as proposed by AEMA?

VII. Third Party Charging Stations

- a. Electric Vehicle Make Ready Model** – Should the Commission modify each utility’s line extension tariffs to subsidize installations of customer-owned separately metered charging equipment under specified circumstances?
- b. EV Charging Separately Metered Rate** – Should the Commission create an SGS subclass to facilitate time-differentiated separately-metered customer owned EV charging under specified circumstances?

VIII. Distributed Energy Resources (“DERs”) Data - Should the Companies’ Net Metering Interconnection Agreement, Parallel Generation Contract Service (Cogeneration Purchase Schedule), and Standby Service Rider include language regarding maintaining and aggregating information related to customer generator systems?

Hearing Schedule

Hearings will start each day at 8:30 and, to the extent possible given many participants' travel requirements, issues will be handled upon the conclusion of the preceding issue. The parties intend to maintain this hearing schedule and acknowledge that it may be necessary to hold hearings after 5 p.m.

September 24 Indiana Model

- Winslow (Company)
- Crawford (Company)
- Fortson (Staff)
- Marke (OPC)
- Owen (Renew Missouri)
- Papanastassiou (AEMA)
- Hyman (DE)

Rate Design/Class Cost of Service

- Miller (Company)
- Lutz (Company)
- Sullivan (Company)
- Winslow (Company)
- Caisley (Company)
- Ives (Company)
- Rush (Company)
- Dietrich (Staff)(Policy)
- Lange, Sarah (Staff)
- Kliethermes (Staff)
- Marke (OPC)
- Hyman (DE)
- Brubaker (MIEC)
- Scripps (Renew Missouri)¹

¹ To be taken out of order on September 27th.

September 25

Tariff Issues

- Lutz (Company)
- Miller (Company)
- Rush (Company)
- Lange, Sarah (Staff)
- Bernsen (Staff)
- Marke (OPC)
- Hyman (DE)
- Meyer (Dogwood)
- Janssen (Dogwood)

Load Research

- Miller (Company)
- Won (Staff)

September 26

Third Party Charging Stations

- Rush (Company)
- Caisley (Company)
- R. Kliethermes (Staff)
- Lange, Sarah (Staff)
- Marke (OPC)
- Hyman (DE)

DER Data

- Lutz (Company)
- Eubanks (Staff)
- Hyman (DE)

September 27

Riders

- Miller (Company)
- Lutz (Company)
- Eubanks (Staff)
- Cunigan (Staff)
- Lange, Sarah (Staff)
- Mastrogiannis (Staff)

- Lucia (Staff)
- Marke (OPC)
- Fracica (Renew)
- Hyman (DE)
- Epperson (DE)
- Meyer (DE)
- Chriss (MECG)

Commission Raised Issues

- Robinson (Company)
- Lutz (Company)
- Cunigan (Staff)
- Lange, Sarah (Staff)

September 28

Continuation of Unfinished Issues

ORDER OF CROSS-EXAMINATION

While for specific issues a different order of cross-examination may be more appropriate, generally, the order of cross-examination, based on adversity, is the following:

KCPL/GMO witnesses

AEMA, MJMEUC, Dogwood, Renew Missouri, DE, MIEC, MECG, Staff, OPC

Staff witnesses

Dogwood, MJMEUC, AEMA, Renew Missouri, MIEC, MECG, DE, OPC, KCPL/GMO

OPC witnesses

AEMA, MJMEUC, Dogwood, Renew Missouri, MIEC, MECG, DE, Staff, KCPL/GMO

MIEC/MECG witnesses

AEMA, MJMEUC, Dogwood, Renew Missouri, DE, OPC, Staff, KCPL/GMO

DE witness

Renew Missouri, AEMA, MJMEUC, Dogwood, MIEC, MECG, OPC, Staff, KCPL/GMO

Renew Missouri

DE, AEMA, MJMEUC, Dogwood, MIEC, MECG, OPC, Staff, KCPL/GMO

AEMA witnesses

DE, MJMEUC, Dogwood, MIEC, MECG, OPC, Renew Missouri, Staff, KCPL/GMO

Dogwood witnesses

MJMEUC, MIEC, MECG, AEMA, Renew Missouri, DE, OPC, Staff, KCPL/GMO

Respectfully submitted,

/s/ Nicole Mers

Nicole Mers

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 18th day of September, 2018.

/s/ Mark Johnson