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**MISSOURI PUBLIC SERVICE COMMISSION**

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**TARIFF AND RATE DESIGN DEPARTMENT**

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**SURREBUTTAL TESTIMONY**

**OF**

**ROBIN KLIETHERMES**

**KANSAS CITY POWER & LIGHT COMPANY  
CASE NO. ER-2018-0145**

**AND**

**KCP&L GREATER MISSOURI OPERATIONS COMPANY  
CASE NO. ER-2018-0146**

*Jefferson City, Missouri  
September 2018*

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1 **RESIDENTIAL CUSTOMER CHARGE**

2 Q. What issues does KCPL and GMO witness Ms. Miller raise regarding Staff's  
3 calculation of the residential customer charge?

4 A. Ms. Miller states that Staff misallocated FERC acct. 908 for KCPL and GMO  
5 because Staff used a different allocator compared to Staff's direct filed CCoS in  
6 Case No. ER-2016-0285, and that Staff did not functionalize FERC acct. 588 for GMO  
7 accurately since Staff functionalized the account differently than GMO's CCoS study.

8 Q. Do you agree with Ms. Miller?

9 A. No. First, Ms. Miller claims Staff misallocated FERC acct. 908 simply because  
10 Staff used a different allocator as compared to Staff's direct filed CCoS in  
11 Case No. ER-2016-0285. However, Ms. Miller fails to mention that Staff filed a corrected  
12 CCoS in the rebuttal testimony of Robin Kliethermes in Case No. ER-2016-0285 that  
13 corrected Staff's direct-filed allocation of FERC acct. 908 consistent with Staff's allocation in  
14 this case and Staff's final residential customer charge calculation in ER-2014-0370. Secondly,  
15 Ms. Miller incorrectly assumes that Staff did not functionalize FERC acct. 588 Miscellaneous  
16 Distribution Expenses correctly since Staff functionalized the account differently than GMO.

17 Q. Did Staff already address the allocation of FERC acct. 908 in this case?

18 A. Yes, on page 3 of my class cost of service and rate design rebuttal testimony,  
19 I explain that costs related to KCPL's and GMO's pre-MEEIA DSIM program, Low-Income  
20 Weatherization program, and Economic Relief Pilot Program (ERPP) are all booked in FERC  
21 acct. 908. These costs are not necessary to connect a customer to the system, and therefore are  
22 removed from the calculation of the residential customer charge.

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1 Q. Did KCPL or GMO provide any justification for why these costs should be  
2 included in the calculation of the customer charge, other than they were included in Staff's  
3 direct filed calculation from ER-2016-0285?

4 A. No.

5 Q. Did Staff functionalize FERC acct. 588 correctly?

6 A. Yes. FERC acct. 588 is Miscellaneous Distribution and Expenses. Staff  
7 allocated this account to each distribution function by that function's percentage of  
8 distribution plant responsibility. For example, if distribution plant related to secondary voltage  
9 accounted for 50% of total distribution plant, then 50% of FERC acct. 588 was allocated to  
10 secondary distribution plant. Since distribution service lines and distribution meters are part of  
11 distribution plant, and also included in the calculation of the residential customer charge, Staff  
12 included a portion of FERC acct. 588 in the residential customer charge calculation.

13 Q. Did GMO provide any justification for why an additional \$6,000,000 from  
14 FERC acct. 588 for Miscellaneous Distribution Expenses should be allocated to the residential  
15 customer charge?

16 A. No.

17 Q. What concerns did Renew Missouri witness Ms. Scripps raise regarding the  
18 costs included in the calculation of the Residential Customer Charge?

19 A. Ms. Scripps argues that only a portion of AMI meter costs should be included  
20 in the calculation of the customer charge since AMI meters offer distribution benefits well  
21 beyond the capabilities of non-AMI metering technologies.<sup>1</sup>

22 Q. Did Staff include all of the cost of KCPL's and GMO's AMI meters in the  
23 calculation of its recommended residential customer charges?

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<sup>1</sup> Page 3 of Ms. Scripps' RD rebuttal testimony.

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1 A. Yes.

2 Q. Is Staff opposed to Ms. Scripps' recommendation that only a portion  
3 of AMI meter costs should be included in the calculation of the residential customer charge?

4 A. At this time, KCPL and GMO do not utilize AMI technologies in the way  
5 described in Ms. Scripps' testimony, so at this time Staff does not recommend allocating a  
6 portion of KCPL's and GMO's AMI meter investment out of the calculation of the customer  
7 charge. However, should KCPL and GMO begin to utilize its AMI technologies in the way  
8 described in Ms. Scripps' testimony, Staff would consider modifications to its allocation of  
9 AMI meters.

10 Q. What is Ms. Scripps's method for allocating AMI meter costs between what is  
11 included in the calculation of the customer charge and what is included in the residential  
12 energy charge?

13 A. Ms. Scripps proposed to use the difference in cost between a traditional meter  
14 and an AMI meter, \$71.50 per meter, as a way to allocate the AMI costs between the  
15 customer charge and residential energy charge. For example, KCPL has approximately  
16 240,000 residential customers, and AMI technology is approximately 90% deployed.  
17 Using Ms. Scripps' \$71.50 per meter cost difference would allocate approximately half of the  
18 AMI meter investment out of the calculation of the customer charge.<sup>2</sup> Depending on how  
19 KCPL and GMO utilize its AMI meter technologies, Ms. Scripps' methodology may be  
20 over-allocating costs out of the customer charge calculation. At this time Staff is unable to  
21 determine whether Ms. Scripps' method is reasonable due to KCPL's and GMO's current  
22 utilization of AMI meter technology.

---

<sup>2</sup>  $(240,000 * 90 * \$71.50) = \$15.4$  million. KCPL has approximately \$33.7 million invested in AMI meters; however, not all of that investment is allocated to the residential customer class. GMO has approximately \$21.6 million invested in AMI meters, but are only 50% deployed.

**TIME OF USE RATES**

Q. Do you agree with Ms. Winslow at page 11 of her testimony that ToU pilots are necessary for KCPL and GMO to move forward with time-differentiated rates?

A. No. Although pilots do offer an opportunity to acquire information related to customer willingness to opt in to the specific rate design offered under a specific pilot, excluding the addition of a demand charge component, KCPL and GMO have not demonstrated that the pilots requested in this case will produce information that adds to any knowledge KCPL has gained from past ToU pilots and rate designs.

Q. What ToU rate designs have KCPL and GMO previously offered to customers?

A. Prior to Case No. ER-2016-0156, GMO offered the below rate design to residential customers in GMO's previous MPS rate district. Currently, the rate schedule is frozen to new customers and there are no customers served on the rate schedule.

**BILLING PERIODS**

<u>Weekdays</u>	<u>Summer</u>	<u>Winter</u>
Peak	1:00 PM - 8:00 PM	7:00 AM - 10:00 PM
Shoulder	6:00 AM - 1:00 PM	
Shoulder	8:00 PM - 10:00 PM	
Off-Peak	10:00 PM - 6:00 AM	10:00 PM - 7:00 AM

<u>Weekends</u>		
Shoulder	6:00 AM - 10:00 PM	
Off-Peak	10:00 PM - 6:00 AM	All hours

**MONTHLY RATE**

	<u>Summer</u>	<u>Winter</u>
Customer Charge .....	\$18.46 per month .....	\$18.46 per month
Energy Charge		
Peak .....	\$0.2036 per kWh .....	\$0.1307 per kWh
Shoulder .....	\$0.1131 per kWh	
Off-Peak .....	\$0.0679 per kWh .....	\$0.0522 per kWh

Although no customers are served on the rate schedule, the rate schedule provides guidance that the level of complexity in peak, off-peak and shoulder times may not be understandable to residential customers at this time.

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1 KCPL also currently has a ToU option that is frozen for residential customers. The rate  
2 schedule provided below currently serves approximately 30 residential customers.

3  
4 Residential Time of Day Service (Frozen)

5 A. Customer Charge:  
6 \$15.94 per customer per month.

7  
8 B. Energy Charge:

9 Summer Season:

10 On-Peak Hours<sup>3</sup>  
11 \$0.21173 per kWh for all kWh per month.

12 Off-Peak Hours  
13 \$0.11796 per kWh for all kWh per month.

14  
15 Winter Season:

16 \$0.08719 per kWh for all kWh per month

17  
18 Additionally, as part of KCPL's Smart Grid Demonstration project, KCPL offered two  
19 additional ToU rate schedules from January 2012 through December 2014; one for residential  
20 general use customers and one for residential space heating customers. Below is the rate  
21 schedule that was available to residential general use customers. The ToU rate schedule that  
22 was available to residential space heating customers is the same as the design below for the  
23 summer months but retains the residential space heating tariffed rates in the winter season.

24  
25 Residential General Use Time of Use Rates<sup>4</sup>

26 Customer Charge (Per Month) \$12.62

27  
28 Energy Charge (Per kWh)

29 Summer Season

30  
31 On-Peak Hours kWh per month \$0.42975

32 Off-Peak Hours kWh per month \$0.07166

33  
34 Energy Charge (Per kWh)

35 Winter Season

36  
37 First 600 kWh per month \$0.11259

38 Next 400 kWh per month \$0.06752

39 Over 1000 kWh per month \$0.05643

<sup>3</sup> On-peak hours are defined to be the hours between 1:00 p.m. and 7:00 p.m.

<sup>4</sup> On-peak hours are defined to be the hours between 3:00 p.m. and 7:00 p.m.

1  
2 At the conclusion of KCPL's Smart Grid Demonstration project, there were approximately  
3 100 residential general use customers served on the ToU rate.<sup>5</sup>

4 **MEEIA CYCLE 2 DEMAND ADJUSTMENT**

5 Q. On page 2 of Ms. Miller's cost of service rebuttal testimony she states Staff did  
6 not make an adjustment to kW demand. Is this correct?

7 A. In response to Staff Data Request No. 328 in Case No. ER-2016-0285,  
8 KCPL and GMO stated they were unable to provide hourly load shapes or marginal loss  
9 factors that are necessary to adjust the hourly demands (in kW) that comprise Net System  
10 Input, and KCPL and GMO were unable to provide the hourly load shapes in this case as well.  
11 Instead, Staff's MEEIA Cycle 2 kWh adjustment was spread to all hourly kW values for a  
12 given month. This results in adjusting the NSI demands for MEEIA Cycle 2, but not  
13 adjusting the shape of the NSI demands for MEEIA Cycle 2.

14 Q. What language regarding demand adjustments is provided in the Cycle 2  
15 Stipulation & Agreement (S&A)?

16 A. Paragraph II.10.c. of the S&A, concerning kW demand, provides as follows:

17 c. Test period kW demand for each customer class will be adjusted by<sup>7</sup>:

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

24  
25 (ii) Subtracting the cumulative annual kW demand savings from  
26 the first month of the test period through the month ending where actual  
27 results are available (most likely two months prior to the true-up date) by  
28 customer class from all active MEEIA programs, excluding Home Energy

---

<sup>5</sup> Approximately 17 residential space heating customers were served on the space heating equivalent ToU rate design.

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1 Reports, Income-Eligible Home Energy Reports and Demand Response  
2 Incentive programs, determined using the same methodology as described  
3 for kWh savings in Tariff Sheet 49K and 49L (KCP&L) and in Tariff  
4 Sheet 138.4 and 138.5 (GMO).

5 Footnote 7 of the S&A provides as follows:

6 <sup>7</sup> Step 1. Begin with kW demand per class provided by Company. Step 2.  
7 Compute Monthly kW demand per program in the same manner as used for TD  
8 calculation. Step 3. kW demand before application of Energy Efficiency (EE)  
9 adjustment. Step 4. Cumulative Annual kW demand per program computed in the  
10 same manner as TD calculation as of Rebase Date. Step 5. Monthly Load Shape  
11 percentage per program converted to billing month equivalent by using a  
12 weighted average calendar month Load Shape percentage based on billing cycle  
13 information of the rate case. Step 6. Monthly EE Rebase Adjustment. Step 7. kW  
14 demand rebased for EE.

15  
16 Q. In layman's terms, what does this require?

17 A. For purposes of weather normalization and estimating fuel and purchased  
18 power expense, Staff and the Company each prepare a model of how much energy is used by  
19 each class in each hour. This model is known as Net System Input ("NSI"). The usage  
20 (measured in kWh) that occurs in each hour is also that hour's demand (measured in kW).  
21 The S&A above describes how the kW levels for each of the 8,760 hours in a year should be  
22 annualized to reflect the changes caused by MEEIA to the level of energy consumed in  
23 each hour.

24 Q. In the absence of hourly load shapes or marginal loss factors for the  
25 MEEIA Cycle 2 programs, as specified in paragraph II.10.c., is Staff's adjustment of kW in  
26 NSI reasonable?

27 A. Yes. Due to KCPL's and GMO's inability to provide the hourly load shapes or  
28 marginal loss factors, Staff was unable to make the adjustment specified above in the manner  
29 provided in the S&A. Staff's kWh adjustment to NSI for MEEIA Cycle 2 does result in some  
30 recognition of the kW impact of MEEIA Cycle 2 to NSI, though it is not necessarily reflected

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1 in the same hours that it would have been if KCPL and GMO had provided the information  
2 required under the S&A.

3 Q. On page 3 of Ms. Miller's cost of service rebuttal testimony she further alleges  
4 that the MEEIA S&A requires an adjustment be made to billing demand. Is this accurate?

5 A. No. Ms. Miller misinterprets the S&A language provided above pertaining to  
6 the adjustment of *class* kW demand in each hour of NSI. The class demands are the shapes of  
7 the hourly load that comprises the NSI, and are unrelated to individual customer non-  
8 coincident demands ("NCP").

9 Q. What is billing demand?

10 A. Billing demand is set by a customer's non-coincident peak. A customer's NCP  
11 is that customer's maximum 15 minutes of demand at any point during a month. If a  
12 customer's NCP is below the class minimum, the customer pays as though the customer met  
13 the minimum demand.

14 Q. Is a class' hourly demand from NSI the same as the sum of the customers'  
15 billing demands in that class?

16 A. No. A given customer's NCP can happen at any time. Within a class, the  
17 customers' NCPs could all occur at different times. Even if "demand" in the S&A were taken  
18 to refer to the class's monthly peak hour, that hour has little or no relationship to the sum of  
19 the NCPs of the customers in that class.

20 Q. Is Ms. Miller's interpretation compatible with how classes are billed?

21 A. No. For example, the residential class has an hourly demand in NSI for each  
22 hour, but does not have any demand charge or any sort of demand billed to the individual  
23 customers. For the non-residential classes, a class' hourly demand is the sum of each  
24 customer's usage in that hour where a customer's billing demand may be the highest usage a

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1 customer experienced in that billing month, or it may be the highest usage a customer  
2 experienced in a prior billing month. Moreover, KCPL and GMO define billing demand  
3 differently. For a non-residential GMO customer, there is a distinction between base billing  
4 demand and seasonal billing demand. KCPL's non-residential rate schedules do not make  
5 this distinction.

6         Additionally, certain KCPL and GMO non-residential rate schedules require a  
7 customer to pay the minimum demand to be served on that rate schedule, even though the  
8 customer's metered demand may be less. For example, the minimum demand for a KCPL  
9 LGS customer served at secondary voltage is 200 kW, even if the customer's actual metered  
10 kW for that month is less than 200 kW the customer's billing demand will still be 200 kW. In  
11 this situation, it is not appropriate to adjust this customer's billing demand below the  
12 minimum because the tariff does not allow the customer to be billed for a lower  
13 demand amount.

14         Q.       Absent the MEEIA S&A kW adjustment above, would you recommend that  
15 an adjustment be made to a customer's billing demand?

16         A.       No. Whether or not a customer's billing demand would change based on the  
17 installation of a MEEIA measure is very dependent upon the rate schedule the customer is  
18 served on, the operational nature of the non-residential customer, and the MEEIA measure the  
19 customer installed.

20 **RATE SWITCHING**

21         Q.       Ms. Miller describes Staff's proposed interclass revenue shifts for KCPL on  
22 page 3 of her class cost of service and rate design rebuttal testimony and she states,  
23 "With this understanding of Staff's proposal, the Company believes that with an expected rate

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1 increase, as outlined in our Direct Filing, the revenue shifts recommended by the Company  
2 offer a more reasonable proposal that acknowledges the likelihood of rate switchers, as well  
3 as, providing shifts that recognize each class's overall rate of return as outlined in our CCOS."

4 Is this an accurate understanding of Staff's revenue shift proposal?

5 A. No. Per page 3 of Staff's direct filed CCoS report, Staff recommends no  
6 revenue neutral shifts if there is no change in revenue requirement or an increase in revenue  
7 requirement is ordered. Therefore, if all customers are currently being served in the  
8 appropriate rate class, then there should be no rate switchers due to Staff's revenue neutral  
9 shifts given no change in revenue requirement or an increase in revenue requirement.

10 Q. If the overall revenue requirement ordered in this case results in a decrease in  
11 revenue requirement, do Staff's revenue neutral shifts cause rate switching?

12 A. Staff's revenue shifts under this circumstance would primarily shift costs away  
13 from the SGS class and shift them marginally to the MGS class. The size of the shift is  
14 determined by the size of the decrease in the overall ordered revenue requirement, preventing  
15 any large disproportionate decreases in revenue requirement for any one class compared to the  
16 other classes' rate schedules. Since the SGS energy rates are higher than the MGS energy  
17 rates, and will remain higher on a kWh basis there should be few, if any, rate switchers caused  
18 by Staff's recommended interclass shifts. Further, given that even those potential rate  
19 switchers would be MGS to SGS customers, the potential revenue at risk to KPCL is  
20 further minimized.

21 Q. Has Staff examined whether customers are currently on their most beneficial  
22 rate schedules?

23 A. Staff has observed that there are several LPS customers that would have paid  
24 lower bills as LGS customers over the last few years.

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1 Q. Is Staff recommending any revenue shifts for GMO?

2 A. No.

3 Q. Do you agree with Mr. Rush on page 5 in his RD Rebuttal testimony that  
4 calculating a rate switcher adjustment is similar to what the parties agreed to in  
5 Case No. ER-2016-0156?

6 A. No. In Case No. ER-2016-0156, GMO requested to consolidate its two rate  
7 districts, causing some non-residential classes to be completely redefined. In this situation  
8 some customers no longer met the minimum demand requirements to be in the class they were  
9 in prior to consolidation. In that case a rate switching adjustment was necessary in order to  
10 move customers to their appropriate rate class.

11 Q. Do Staff's revenue neutral shifts and rate design proposals redefine the size  
12 requirements of customers to be served in a rate class?

13 A. No.

14 Q. In Case No. ER-2016-0156, did GMO identify potential rate switchers, prior to  
15 filing surrebuttal testimony?

16 A. Yes.

17 Q. Ms. Miller and Mr. Rush, in their rebuttal testimonies, suggest that Staff needs  
18 to take potential rate switchers into account. Has KCPL and GMO identified any potential  
19 rate switchers caused by the various revenue shift and rate design proposals in this case?

20 A. Not that I am aware of.

1 **CLEAN CHARGE NETWORK**

2 Q. In light of the Western District Court of Appeals opinion filed  
3 August 7, 2018, in WD80911, has Staff prepared an estimate of the class cost of service for  
4 the Clean Charge Network infrastructure for KCPL and GMO?

5 A. In part, yes. Because much or all of the distribution and other system  
6 facilities<sup>6</sup> for the Clean Charge Network are already included in the costs of service for the  
7 KCPL SGS class and the GMO SGS class, Staff does not currently have the information  
8 necessary to disaggregate those costs from the existing SGS classes and include them in a  
9 separate Clean Charge Network class. Staff has prepared a CCoS estimate that allocates to a  
10 "Clean Charge Network class" the costs that Staff has adjusted out of the KCPL and GMO  
11 revenue requirements, consistent with the Commission's prior Report and Order concerning  
12 the Clean Charge Network charging station costs.

13 Q. What are the results of those CCoS estimates for the revenue requirement of  
14 the Clean Charge Network class not already included in SGS rates?

15 A. For KCPL the Clean Charge Networks revenue requirement is approximately  
16 \$1.5 million, for GMO it is approximately \$760,000.<sup>7</sup>

17 Q. Whether or not included in rate base, what rates are applicable to the usage (or  
18 availability of usage for stations that do not experience usage in a given month) of company-  
19 owned charging stations?

20 A. Company-owned charging stations should be billed at the SGS rates. If the  
21 entire charging station infrastructure is included in rate base, company-owned charging

---

<sup>6</sup> These are the costs related to distribution line extensions.

<sup>7</sup> These costs are based on Staff's direct filed cost of service and include the EV Station investment, operation and maintenance expenses related to the EV stations and customer account information relating to EV stations. That FERC accounts that were impacted include 371, 583, 584, 586, 588, 598, 910 and 935.

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1 stations should be billed at the SGS rates, plus an amount necessary to accomplish recovery of  
2 the revenue requirement of the Clean Charge Network class.

3 Q. Is Staff opposed to modifying its proposed EV charging station rates to make  
4 them applicable to company-owned charging stations?

5 A. No, Staff would not be opposed to such a modification. However, two  
6 adjustments would be required. First, because as Mr. Rush notes in his RD Rebuttal at page  
7 8, the company-owned charging stations lacks the demand-limiting abilities required for the  
8 customer-owned, separately metered charging rates, the SGS customer charge would need to  
9 be restored to its normal level, and the facilities charge would be eliminated. Second, because  
10 the SGS rates are not designed to recover the cost of the company-owned charging stations  
11 from the SGS class, the revenue requirement associated with the Clean Charge Network class  
12 would need to be incorporated into the rates for company-owned, separately metered  
13 EV charging. Those costs are not insignificant. While at this time, Staff does not have  
14 reliable data to generate exact rates; examples of the customer-owned and company-owned  
15 rates based on assumptions and available information are provided below:<sup>8</sup>

	Rate for non-utility Separately Metered charging station owners with Qualifying Facilities		Rate for utility-owned charging stations		Rate for non-utility Separately Metered charging station owners with non-qualifying facilities	Rate for non-utility charging station owners with non-qualifying facilities not separately metered
Station owner? Separately Metered? Customer facilities required to qualify under make ready tariff?	Non-Utility Yes		Utility Yes		Non-Utility Yes	Non-Utility No
	Yes		No		No	No
	GMO	KCPL	GMO	KCPL		
Base Customer Charge:	10.00	10.00 \$/Month	157.81	262.27 \$/Month	SGS, unless charging equipment demand is high enough to cause switching to MGS or LGS	Customer's otherwise applicable rate
Facilities Charge:	0.5564	0.3632 \$/kW				
On-Peak (as defined in Residential Tariff):	\$ 0.09	\$ 0.16 \$/kWh	\$ 0.09	\$ 0.16 \$/kWh		
Off-Peak (as defined in Residential Tariff):	\$ 0.08	\$ 0.15 \$/kWh	\$ 0.08	\$ 0.15 \$/kWh		

16

<sup>8</sup> Applicable FAC, RESRAM, DSIM and other riders would be in addition to these charges.

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1 Q. Could the rates provided above for the company-owned charging stations be  
2 restructured to develop a rate to charge directly to the EV owner charging their car?

3 A. Yes. The customer charge portion of the company-owned charging station rate  
4 could be prorated over the number of charging sessions assumed per month and charged to  
5 EV owners in conjunction with the volumetric rate applied to each kWh the EV owner uses to  
6 charge their car. For example, in KCPL the base customer charge for each station is \$262.27,  
7 assuming 180 charging sessions per charger per month<sup>9</sup> results in a session fee per EV charge  
8 of \$1.35 for KCPL. The GMO calculation would result in \$0.74 per session.

9  
10 **CLASS COST OF SERVICE ALLOCATIONS**

11 Q. Do you agree with Mr. Brubaker that a significant portion of  
12 Administrative and General (A&G) expense is allocated to classes on the basis of  
13 other O&M expenses, which include significant amounts of fuel and purchased  
14 power expenses?<sup>10</sup>

15 A. Not entirely. I agree that there are A&G expenses allocated to classes on the  
16 basis of other O&M expenses, including fuel and purchased power expenses. However, the  
17 amount of A&G expenses allocated on other O&M expenses is not significant.

18 Q. What amount of A&G expenses are allocated on other O&M expenses?

19 A. In Staff's direct filed CCoS for KCPL, total A&G expense is approximately  
20 \$73 million, and of that, \$-6.8 million is allocated on other O&M expenses, including fuel and  
21 purchased power expense.

22 Q. Would Staff's overall CCoS recommendation for KCPL change if you were to  
23 change the O&M allocator to remove fuel and purchased power expenses as recommended  
24 by Mr. Brubaker?

---

<sup>9</sup> Based on the actual number of session charges in 2017 provided by the Company in Staff Data Request 266, the session fee per EV charge would be \$36.00 for KCPL and \$18.00 for GMO.

<sup>10</sup> Page 11 of Mr. Brubaker's RD rebuttal testimony.

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1           A.     As mentioned above, Staff allocated \$-6.8million to rate classes based on other  
2 O&M expenses, less admin expense. Changing the allocator to Mr. Brubaker's recommended  
3 method, or deducting fuel from the currently used allocator, results in a greater share of the  
4 negative amount getting allocated to the Residential class and less of the negative share  
5 allocated to the LGS and LPS classes. Either way, as illustrated below, the change in  
6 allocation of A&G expenses has minimal impact on each class' cost of service.

	Residential	SGS	MGS	LGS	LPS	Lighting
Dollar change to Cost of Service	\$ (211,885)	\$ (20,195)	\$ 22,400	\$ 78,048	\$ 134,340	\$ (2,710)
% Change Cost of Service	-0.06%	-0.04%	0.02%	0.04%	0.08%	-0.02%

8     **TRUE-UP DIRECT**

9           Q.     Did you make an adjustment to KCPL's and GMO's Large Power class  
10 revenues to annualize for MEEIA Cycle 2 installed measures through June 2018?

11          A.     In part, yes.

12          Q.     Did Staff have a concern with KCPL's or GMO's reported installed measures?

13          A.     Yes. \*\* \_\_\_\_\_

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Surrebuttal Testimony of  
Robin Kliethermes

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Q. Does this conclude your surrebuttal testimony?

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A. Yes.

