

Exhibit No.:

Issue(s): Greenwood Solar Allocations,
Staff Work Papers,
Lake Road Allocations,
Fuel Model Results

Witness: Charles T. Poston, PE

Sponsoring Party: MoPSC Staff

Type of Exhibit: Surrebuttal and
True-Up Direct Testimony

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

Date Testimony Prepared: September 4, 2018

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

ENGINEERING ANALYSIS DEPARTMENT

**SURREBUTTAL AND
TRUE-UP DIRECT TESTIMONY**

OF

CHARLES T. POSTON, PE

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

AND

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

FILED
October 23, 2018
Data Center
Missouri Public
Service Commission

Jefferson City, Missouri
September 2018

Staff Exhibit No. 243
Date 9-25-18 Reporter TM
File No. ER-2018-0145 +
0146

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TRUE-UP VARIABLE FUEL & PURCHASED POWER EXPENSE (GMO ONLY) 4

1 Q. What is the purpose of your True-Up Direct Testimony?

2 A. The purpose of my True-Up Direct Testimony is to provide an update to the
3 variable fuel and purchased power expense from Staff's production cost model for KCP&L
4 Greater Missouri Operations ("GMO").

5 **SURREBUTTAL TESTIMONY**

6 **ALLOCATION OF ENERGY FROM GREENWOOD SOLAR (KCPL & GMO)**

7 Q. GMO witness Mr. Tim M. Rush states in his Rebuttal Testimony that Staff
8 recommends that the energy produced at the Greenwood Solar facility be allocated 100% to
9 the customers of GMO. Does his statement accurately reflect how energy from the
10 Greenwood Solar facility is treated in Staff's production cost models?

11 A. No. In Staff's production cost models, 62.51% of the energy from the
12 Greenwood Solar facility is allocated to Kansas City Power and Light Company ("KCPL")
13 with the remaining 37.49% being allocated to GMO. These allocation factors are the same as
14 the customer-based allocation factors that Staff witness Karen Lyons presented in Staff's Cost
15 of Service Report. The use of a method to share costs between KCPL and GMO customers is
16 consistent with the Commission's order in the case that authorized the construction of the
17 Greenwood Solar facility.

18 **OPC'S USE OF STAFF WORKPAPERS IN TESTIMONY (GMO ONLY)**

19 Q. The Rebuttal Testimony of OPC witnesses Ms. Lena M. Mantle and
20 Mr. John A. Robinett provided confidential schedules LMM-R-3 and JAR-R-5C that
21 were described as "the summary sheet of Staff's fuel run results for its direct case" and
22 "the GMO fuel run summary sheet provided as a work paper by Staff supporting its fuel

1 expense in its direct case.” Are these schedules the same as the work paper that you provided
2 in support of your Direct Testimony?

3 A. Yes. However, it appears that some editing was done to my work paper prior
4 to its attachment to OPC’s testimony. Schedules LMM-R-3 and JAR-R-5C are not identical
5 to the work paper that I created. The schedules filed by OPC contain listings for two
6 additional power plants not owned or operated by either KCPL or GMO and that are not
7 present in my original work paper. Additionally, a section of my work paper that contained a
8 summary of fuel consumption and expense was omitted from the schedules filed by OPC.
9 Aside from those differences and some minor formatting changes, the remainder of my work
10 paper is the same.

11 **LAKE ROAD ALLOCATION FACTORS (GMO ONLY)**

12 Q. In Mr. Rush’s Rebuttal Testimony, he states that GMO has spent considerable
13 time discussing their proposed allocation methods with you during this case. Is this correct?

14 A. Yes. During the course of my review of the proposed Lake Road allocation
15 manual and supporting methods, I sent numerous data requests to GMO and was provided
16 responses to all of my questions. Additionally, I had the opportunity to speak with Mr. Rush
17 via telephone and in-person on several occasions in which I was able to ask questions related
18 to the Lake Road allocation factors. I have also had the chance to review both of the revisions
19 to the proposed Lake Road allocation procedures, and to provide feedback to GMO.

20 Q. Has your review of the proposed Lake Road allocation procedures and
21 their underlying methods caused you to change the recommendations that you made in your
22 Direct and Rebuttal Testimonies?

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-2018-0145
)
)
) and

In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service)
) Case No. ER-2018-0146
)
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AFFIDAVIT OF CHARLES T. POSTON, P.E.

STATE OF MISSOURI)
)
) ss.
COUNTY OF COLE)

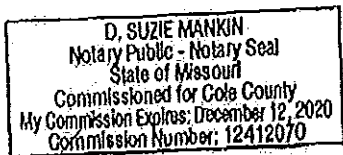
COMES NOW CHARLES T. POSTON, P.E., and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal and True-Up Direct Testimony* and that the same is true and correct according to his best knowledge and belief.

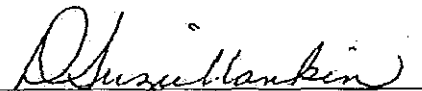
Further the Affiant sayeth not.


CHARLES T. POSTON, P.E.

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 29th day of August 2018.




Notary Public