



Exhibit No.:  
Issue: Complaint  
Witness: Maria Lopez  
Type of Exhibit: Rebuttal Testimony  
Sponsoring Party: Kansas City Power & Light Company  
Case No.: EC-2018-0103  
Date Testimony Prepared: April 13, 2018

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06/08/2018  
Data Center  
Missouri Public  
Service Commission

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO.: EC-2018-0103**

**REBUTTAL TESTIMONY**

**OF**

**MARIA LOPEZ**

**ON BEHALF OF**

**KANSAS CITY POWER & LIGHT COMPANY**

**Kansas City, Missouri  
April 2018**

\*\*\* \_\_\_\_\_ \*\* Designates "Confidential" Information.  
Certain Exhibits Attached To This Testimony Designated "(CONFIDENTIAL)"  
Also Contain Confidential Information.  
All Such Information Should Be Treated Confidentially  
Pursuant To 4 CSR 240-2.135.

*Respondent* Exhibit No. 200  
Date 6-1-18 Reporter SAY  
File No. EC-2018-0103

**REBUTTAL TESTIMONY**

**OF**

**MARIA LOPEZ**

**Case No. EC-2018-0103**

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

2    A:    My name is Maria Lopez. My business address is 1200 Main Street, Kansas City,  
3       Missouri 64105.

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

5    A:    I am employed by Kansas City Power & Light Company (“KCP&L” or the “Company”)  
6       as Customer Relations Advisor – Senior. The focus of this position involves researching  
7       and responding to customer complaints before the commission, in addition to managing  
8       the medical and other specialized programs, community outreach, and education.

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

10   A:    I am testifying on behalf of Kansas City Power & Light Company.

11   **Q:**    What are your responsibilities?

12   A:    Most recently, I researched and responded to the customer complaints before the  
13       commission for the legacy KCP&L Missouri and Kansas territories. Currently, I am  
14       working on promoting KCP&L’s low-income programs, in addition to customer outreach  
15       education.

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

17       I started my career with Aquila in 2004 and transitioned to KCP&L in 2008. I have  
18       worked in the Customer Contact Center, the Customer Correspondence group, the  
19       Revenue Protection department, and currently in the Customer & Community Affairs

department. I am currently enrolled in school pursuing my bachelor's degree in business administration.

**Q: Have you previously testified in a proceeding at the Missouri Public Service Commission ("MPSC" or "Commission") or before any other utility regulatory agency?**

**A: No.**

**Q: On what subjects, will you be testifying?**

**A: I will speak to the debt from Mr. Dudley's ("Complainant") previous accounts at \*\* [REDACTED] \*\*, \*\* [REDACTED] \*\*, \*\* [REDACTED] \*\*, and \*\* [REDACTED] \*\*, as well as how that debt impacted his request for service at \*\* [REDACTED] \*\*. I will explain how KCP&L's actions in setting up Mr. Dudley's service met the requirements of its tariffs and MPSC rules.**

**Q: Please provide the history of the Complainant's account.**

**A: The Complainant has accrued debt in the amount of \*\* [REDACTED] \*\* from service at four previous addresses connected from \*\* [REDACTED] \*\*. All the accounts were opened by the Complainant and listed in the Complainant's name.**

**Summary of Service for Complainant:**

**\*\***

Service Address	Account Number	Connect Date	Disconnect Date	Non-Payment Amount	Tampering Charges
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**\*\***

1           \*\* [REDACTED]

2           [REDACTED]

3           \*\*

4           \*\* [REDACTED]

5           [REDACTED]

6           \*\*

7           The total outstanding debt of \*\* [REDACTED] \*\* was transferred to the Complainant's  
8           last service account \*\* [REDACTED] \*\* at \*\* [REDACTED] \*\*

9           On March 21, 2016, the Complainant called to request service at the property  
10          located at \*\* [REDACTED] \*\* KCP&L advised the  
11          Complainant that past due amounts from previous accounts needed to be paid before  
12          service could be established.

13          The Complainant made an informal complaint to the Commission on March 21,  
14          2016, disputing the transferred balances from previous addresses.

15          On March 24, 2016, KCP&L responded to the informal complaint. The Company  
16          determined that Complainant was responsible for the past due amounts owed for  
17          electrical service at the locations listed in the chart above as the accounts were in  
18          Complainant's name. Further, service at \*\* [REDACTED] \*\*, account number  
19          \*\* [REDACTED] \*\* was under [REDACTED], brother of the Complainant with an  
20          outstanding debt of \*\* [REDACTED] \*\*. Because water service for \*\* [REDACTED] \*\* at  
21          that time was in Complainant's name, it was determined he benefitted from the electric  
22          service provided by KCP&L and it was reasonable for KCP&L to hold Complainant  
23          responsible for that debt. On November 3, 2017, the Complainant called in for service at

1       \*\*[REDACTED]\*\* under account number \*\*[REDACTED]\*\* A call center  
2       representative offered the Cold Weather plan of \*\*[REDACTED]\*\* initial payment and  
3       \*\*[REDACTED]\*\* per month. This was based on the outstanding debt of \*\*[REDACTED]\*\* and  
4       the balance due of \*\*[REDACTED]\*\* at \*\*[REDACTED]\*\* The Complainant advised he  
5       was seeking an agency grant of \*\*[REDACTED]\*\* toward the debt. The representative advised  
6       that if the \*\*[REDACTED]\*\* grant was placed, it would be used as the initial payment for the  
7       Cold Weather plan.

8               On November 6, 2017, an \*\*[REDACTED]\*\* grant was placed on the Complainant's  
9       account.

10              On November 9, 2017, service was connected at \*\*[REDACTED]\*\* under the  
11       Complainant's name under the Cold Weather Rule. Mr. Dudley's monthly payment was  
12       set at \*\*[REDACTED]\*\*

13   **Q. Is the account current?**

14   A.   \*\*[REDACTED]  
15       [REDACTED]  
16       [REDACTED]\*\*

17   **Q. Has Complainant made payments on the account?**

18   A.   \*\*[REDACTED]  
19       [REDACTED]  
20       [REDACTED]\*\*

21   **Q. Is service in Complainant's name?**

22   A.   The service at \*\*[REDACTED]\*\* is currently in the name of Gene  
23       Dudley and has been since November 9, 2017.

1 Q. Did KCP&L bill more than one customer for Complainant's account as alleged in  
2 Paragraph 1 of Complainant's testimony?

3 A. No. The service at all four locations was in Complainant's name and the bill was mailed  
4 to the service address.

5 Q. What tariff allows KCP&L to transfer past due amounts from other Complainant's  
6 accounts to the Complainant's account at \*\* [REDACTED] \*\*?

7 A. The tariff can be found in the Company's General Rules and Regulations Applying to  
8 Electric Service, Sheet No. 1.10, paragraph 3.04:

9 PRIOR INDEBTEDNESS OF CUSTOMER: If, at the time of  
10 application, a Customer or any member of the Customer's  
11 household is indebted to the Company for that same class of  
12 electric service previously supplied at the same or any other  
13 premises, and the Customer received substantial use and benefit of  
14 the previous electric service, the Company shall not be required to  
15 commence supplying electric service to the Customer, or if  
16 commenced the Company may terminate such service until  
17 payment of the indebtedness has been made.  
18

19 Q. How did KCP&L know that Mr. Dudley received substantial use and benefit of  
20 electric service at the four locations listed on the table on page 2?

21 A. The service at all four locations was in Complainant's name. Therefore, it is reasonable  
22 for KCP&L to assume that he received substantial use and benefit of the electric service  
23 either as an occupant or a landlord.

24 Q. How did KCP&L follow this tariff?

25 A. KCP&L required payment of Mr. Dudley's debt from his previous addresses before  
26 service could be started at \*\* [REDACTED] \*\* Mr. Dudley agreed to a Cold Weather  
27 budget plan, paid the initial payment with a grant, and service was provided.

- 1    **Q.**    **Did the Commission Staff provide a report and recommendation in this case?**
- 2    **A.**    Yes, Staff found that KCP&L was compliant with its tariff and the Commission rules. A
- 3       copy is attached as **Exhibit A**.
- 4    **Q:**    **Does that conclude your testimony?**
- 5    **A:**    Yes, it does.


Gene Edward Dudley, )  
v. ) File No. EC-2018-0103  
Kansas City Power & Light Company, )

**STATE OF MISSOURI            )**  
                                       ) **ss**  
**COUNTY OF JACKSON        )**

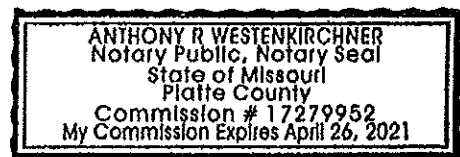
1. My name is Maria Lopez. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Customer Relations Advisor – Senior.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Maria Lopez

  
Notary Public

My commission expires: 4/26/2021





**Exhibit A**  
**Report of MPSC Staff**  
**has been deemed**  
**CONFIDENTIAL**  
**in its entirety and filed under seal**

# Missouri PSC EXHIBITS

Exhibit No. \_\_\_\_\_  
Date \_\_\_\_\_ Reporter \_\_\_\_\_  
File No. \_\_\_\_\_

1. All EXHIBITS should be STAMPED and FILLED OUT PROPERLY

Example:

Sponsoring Party Rspt Exhibit No. 200  
Case No(s). CV-2018-0103  
Date 6-1-18 Rptr Sarah Davison

a. Major Rate Cases, a lot of the exhibits are now being pre-marked, but each individual reporter still needs to use the stamp on each exhibit and fill in all information.

b. If more than ONE Case Number involved, all the case numbers need to be listed.

2. All EXHIBITS should be RETURNED to LESLIE MYERS, JUDY POPE OR CHRIS KOENIGSFELD on the 9<sup>th</sup> Floor, use the phone in waiting area for assistance.

3. All TRANSCRIPTS ordered will be Original Full Size, Copy in Condensed format with ASCII and E-TRANS to be sent to Leslie Myers at MO PSC, Adjudication Department. All invoices will be sent to her attention as well. E-mail address for E-TRANS is: leslie.myers@psc.mo.gov. No ASCII disk to be provided.

4. ALL public hearings should be set-up by reporter following guidelines that PSC sends to MLS for review. INDEX and EXHIBIT REFERENCES should be at the back of the transcript before the court reporter's certificate page.

5. Per Chief Law Judge of MO PSC, Ms. Collene "Cully" M. Dale has indicated that however previously not necessary for certificate pages to be on hearings you may add certificate pages to any PSC matter.

- a. A deposition transcript should always have a certificate
- b. Hearing transcript can **NOW** have a certificate page; this will eliminate any future problems with a matter being filed with the Supreme Court. Supreme Court has to have a certificate of reporter on the transcripts submitted.