

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of KCP&L Greater Missouri)
Operations Company’s Request for Authority to) File No. ER-2016-0156
Implement A General Rate Increase for)
Electric Service) Tracking No. YE-2016-0223

DOGWOOD ENERGY, LLC’S POSITION STATEMENT

COMES NOW Dogwood Energy, LLC (“Dogwood”) and respectfully submits its
Position Statement in this proceeding pursuant to the approved schedule.

II. Crossroads

- A. Should the increased transmission costs GMO incurs to transmit energy from its Crossroads Energy Center at Clarksdale, Mississippi to its service area in Missouri due to Entergy’s entry in MISO be included in GMO’s revenue requirement?¹
- B. Should Crossroads be excluded from GMO’s rate base?

Dogwood Position

The Commission should continue to follow its previous court-approved decisions. There is no basis to include an incremental increase in transmission costs when the base costs have been excluded for imprudence. The Commission has already held that the decision to add the Crossroads generating facility to the MPS generation fleet was only prudent if the plant is included in rate base at a reduced value without the additional cost of transmission from Mississippi to Missouri. The Commission’s order herein should confirm continued application of its prior decisions.

See *State ex rel KCPL Greater Missouri Operations Company*, 408 SW3d 153 (Mo App 2013)(transfer denied Mo SCt, cert denied US SCt); *KCPL GMO v. MCEG*, 432 SW3d 207 (Mo App 2014)(transfer denied Mo SCt)(Memorandum of Opinion).

See generally testimony of Staff witnesses Featherstone, Beck and Stahlman, OPC witness Mantle.

XXIV. Class cost of service, rate design, tariff rules and regulations

- A. Should the Commission eliminate the MPS and L&P rate districts, and order GMO-wide rates?

- B. Rate design
- a) What is an appropriate residential rate design?
 - b) What is an appropriate residential customer charge under the appropriate rate design?
 - c) What customer impact mitigation measures, if any, should be used for the LPS, LGS, and SGS classes?
 - d) What billing determinants should be used for determining the rates to collect GMO's cost of service?
 - e) What adjustment should be made to account for any changes in retail revenue attributable to customers being placed on their most advantageous rate as a result of the rate design approved in this case?
 - f) When should GMO revise its load research to account for the elimination of the MPS and L&P rate districts?
 - g) Should the Commission order GMO to file a rate design case once a year of hourly data is available under the new classes and implemented rates?
 - h) Should the Commission order GMO to file a Class Cost of Service Study with supporting data in its next rate case?
 - i) Should the Commission allow GMO to freeze its time differentiated rates, including Time of Use ("TOU")?
 - j) Should the Commission order GMO to file a proposal to make TOU rates available to all customers including a study of applicable TOU determinants?
 - k) Should the Commission order GMO specifically to study time of use rates and summer/shoulder/winter rates, and to include its proposals for such rates in its next rate filing?
 - l) Should the Commission order a working group be formed to evaluate the impacts, for residential and small general service class, of transitioning to inclining block rates on lower income and electric space heating and cooling users and to consider the merits of more extensive block rate modifications?

Dogwood Position

The Commission has already approved a stipulation that provides for uniform percentage increases across rate classes. Dogwood supports the mitigation of any extreme rate increases within rate classes.

See *State ex rel KCPL Greater Missouri Operations Company*, 408 SW3d 153 (Mo App 2013)(transfer denied Mo SCT, cert denied US SCT).

See generally testimony of MECG/MEIC witness Brubaker.

Respectfully submitted,

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was served this 9th day of September 2016, by email to all counsel of record.

/s/ Carl J. Lumley
