

Exhibit No.:
Issue: Revenues
Witness: Kim Cox
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: EO-2024-0002
Date Testimony Prepared: December 15, 2023

MISSOURI PUBLIC SERVICE COMMISSION
INDUSTRY ANALYSIS DIVISION
TARIFF/RATE DESIGN DEPARTMENT

REBUTTAL TESTIMONY

OF

KIM COX

**EVERGY MISSOURI METRO, INC.,
d/b/a EVERGY MISSOURI METRO**

and

**EVERGY MISSOURI WEST, INC.,
d/b/a EVERGY MISSOURI WEST**

CASE NO. EO-2024-0002

Jefferson City, Missouri
December 15, 2023

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REBUTTAL TESTIMONY**

OF

KIM COX

**EVERGY MISSOURI METRO, INC.,
d/b/a EVERGY MISSOURI METRO**

and

**EVERGY MISSOURI WEST, INC.,
d/b/a EVERGY MISSOURI WEST**

CASE NO. EO-2024-0002

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1 **REBUTTAL TESTIMONY**

2 **OF**

3 **KIM COX**

4 **EVERGY MISSOURI METRO, INC.,**
5 **d/b/a EVERGY MISSOURI METRO**

6 **and**

7 **EVERGY MISSOURI WEST, INC.,**
8 **d/b/a EVERGY MISSOURI WEST**

9 **CASE NO. EO-2024-0002**

10 Q. Please state your name and business address.

11 A. Kim Cox, 200 Madison Street, Jefferson City, Missouri 65101.

12 Q. By whom are you employed and in what capacity?

13 A. I am employed by the Missouri Public Service Commission (“Commission”) as
14 a Research/Data Analyst in the Tariff and Rate Design Department of the Industry Analysis
15 Division of the Commission Staff. A copy of my case participation and credentials is attached
16 as Schedule KC-r1.

17 Q. What is the purpose of your rebuttal testimony?

18 A. The purpose of my rebuttal testimony is to discuss the importance of the
19 information requested by Staff and agreed to be provided by Evergy Metro, Inc., d/b/a Evergy
20 Missouri Metro and Evergy Missouri West, Inc., d/b/a Evergy Missouri West (collectively,
21 “Evergy”) as set out below¹ relating to Evergy’s rate case billing determinants and the revenues
22 derived from them.²

¹ Case No. ER-2022-0129 and ER-2022-0130, 2022 Stipulation and Agreement and direct testimony in this case of Evergy witness, Mr. Bradley Lutz, page 3 and 4.

² Staff witness, Michael Stahlman discusses the importance of Evergy’s rate case usage as it relates to weather normalization, Staff witness, J Luebbert discusses its importance as it relates to the Missouri Energy Efficiency Investment Act, and Staff witness, Sarah Lange discusses its importance as it relates to Evergy’s class cost of service studies and Evergy’s rate design by rate class as well as other topics.

1 2. For each rate code, provide the total number of customers served on that
2 rate schedule on the first day of the month and the last day of the month;

3 a. For each rate schedule on which customers may take service at
4 various voltages, the number of customers served at each voltage
5 on the first day of the month and the last day of the month;

6 3. For each rate code, the number of customers served on that rate schedule
7 on the first day of the month and the last day of the month for which interval
8 meter readings are obtained;

9 a. For each rate code on which customers may take service at
10 various voltages, the number of customers served at each voltage
11 on the first day of the month and the last day of the month which
12 interval meter readings are obtained;

13 4. For each rate code for which service is available at a single voltage, the
14 sum of customers' interval meter readings, by interval; and

15 a. For each rate code on which customers may take service at
16 various voltages, the sum of customers' interval meter readings, by
17 interval and by voltage.

18 This information, or data, was incorporated by reference into the Stipulation and Agreement
19 entered into by the parties at the conclusion of Case ER-2022-0129 and ER-2022-0130
20 (hereafter referred to as the "2022 Stipulation and Agreement").

21 **RESPONSE TO MS. JULIE DRAGOO**

22 Q. What is Ms. Dragoo's recommendation regarding the data requested above
23 in 2, 3, and 4 of the 2022 Stipulation and Agreement in Case ER-2022-0129 and
24 ER-2022-0130?

25 A. At page 16 of her testimony, Ms. Dragoo states,

26 I recommend the Commission reject as unreasonable data requests 1, 5 and
27 6 and to assess the data request 8 as separate requests and to reject as
28 unreasonable the subparts to data request 8 that are impacted by data
29 request 1 and 5. For the other data requests, I believe it is important the
30 Commission understand Evergy's position with the data requests (as
31 defined in assumptions and effort in the data table) and acknowledge the
32 level of cost associated with providing new and different views of data. The

1 Company is willing to work with Staff to further develop requirements that
2 would refine the cost estimates and timing for the other data requests. Part
3 of those conversations would be to align expectations on the format and
4 frequency of sharing the data.

5 Q. What is Staff's response to her recommendation?

6 A. First, Staff would like to address the data requested in which Ms. Dragoo is
7 referencing in her recommendation. The data that she references is part of the 2022 Stipulation
8 and Agreement filed in ER-2022-0130. They are not data requests ("DR").

9 Additionally, this testimony will only address 2, 3, and 4 as listed above³. As
10 Ms. Dragoo stated, Evergy is willing to work with Staff on the other requests for data (2, 3, 4,
11 and 7). While Staff appreciates Evergy's willingness to work with Staff on the requested data
12 described in 2, 3, and 4 of the 2022 Stipulation and Agreement, it is unclear why Evergy has
13 not had those conversations with Staff.

14 Q. Did Staff submit DR's in this docket to attempt to gather the information
15 requested in the 2022 Stipulation and Agreement?

16 A. Yes. Specifically, Staff submitted DR No. 0069 and DR No. 00140.

17 Q. What did DR No. 0069 ask?

18 A. DR No. 0069 asked:

19 Is Evergy MISSOURI METRO currently capable of providing the total
20 number of customers served on any given rate code on the first day of the
21 month and the last day of the month? (b) Please identify the rate codes for
22 which Evergy MISSOURI METRO can provide the total number of
23 customers served on the first day of the month and the last day of the
24 month. (c) Please identify the rate codes for which Evergy MISSOURI
25 METRO cannot provide the total number of customers served on the first
26 day of the month and the last day of the month. (d) Is Evergy MISSOURI
27 METRO currently capable of providing, by rate code, the total number of
28 customers served on the first day of each applicable billing cycle and the
29 last day of each billing cycle? (e) Please identify the rate codes for which

³ Staff witness, Sarah Lange will address the data requested in 1, 5, 6, 7, and 8 of the Stipulation and Agreement.

1 Evergy MISSOURI METRO can provide, by rate code, the total number
2 of customers served on the first day of each applicable billing cycle and the
3 last day of each billing cycle. (f) Please identify the rate codes for which
4 Evergy MISSOURI METRO cannot provide, by rate code, the total
5 number of customers served on the first day of each applicable billing cycle
6 and the last day of each billing cycle. (g) For each rate code for which
7 Evergy MISSOURI METRO can provide the information, please provide,
8 by rate code, the total number of customers served on the first day of each
9 applicable billing cycle and the last day of each billing cycle, for each
10 applicable billing cycle, for the billing months of July 2023 and October
11 2023. Please specify billing cycle dates. (h) What is Evergy MISSOURI
12 METRO's estimate of the cost to provide the total number of customers
13 served on any given rate code on the first day of the month and the last day
14 of the month?

15 Evergy's response was as follows:

16 Reporting of "total number of customers served" is one of the items examined
17 by the Company in its Direct testimony. Available details are offered there.

18 Reporting by Billing Cycle represents a new element of the request and would
19 be additional effort to the scope identified in the Company Direct testimony.

20 Q. What did DR No. 00140 ask?

21 A. DR No. 00140 asked:

22 Is Evergy MISSOURI WEST currently capable of providing the total
23 number of customers served on any given rate code on the first day of the
24 month and the last day of the month? (b) Please identify the rate codes for
25 which Evergy MISSOURI WEST can provide the total number of
26 customers served on the first day of the month and the last day of the
27 month. (c) Please identify the rate codes for which Evergy MISSOURI
28 WEST cannot provide the total number of customers served on the first day
29 of the month and the last day of the month. (d) Is Evergy MISSOURI
30 WEST currently capable of providing, by rate code, the total number of
31 customers served on the first day of each applicable billing cycle and the
32 last day of each billing cycle? (e) Please identify the rate codes for which
33 Evergy MISSOURI WEST can provide, by rate code, the total number of
34 customers served on the first day of each applicable billing cycle and the
35 last day of each billing cycle. (f) Please identify the rate codes for which
36 Evergy MISSOURI WEST cannot provide, by rate code, the total number
37 of customers served on the first day of each applicable billing cycle and the
38 last day of each billing cycle. (g) For each rate code for which Evergy

1 MISSOURI WEST can provide the information, please provide, by rate
2 code, the total number of customers served on the first day of each
3 applicable billing cycle and the last day of each billing cycle, for each
4 applicable billing cycle, for the billing months of July 2023 and October
5 2023. Please specify billing cycle dates. (h) What is Evergy MISSOURI
6 WEST's estimate of the cost to provide the total number of customers
7 served on any given rate code on the first day of the month and the last day
8 of the month?

9 Evergy's response was as follows:

10 Reporting of "total number of customers served" is one of the items examined
11 by the Company in its Direct testimony. Available details are offered there.

12 Reporting by Billing Cycle represents a new element of the request and would
13 be additional effort to the scope identified in the Company Direct testimony.

14 Q. Were the responses sufficient?

15 A. No. The responses directed Staff to the Company's Direct testimony that did
16 not provide any additional details.

17 Q. Has Evergy been able to provide the related information in some rate cases?

18 A. In Evergy's most recent rate cases,⁴ Evergy represented that the bill frequencies
19 they relied upon in calculating revenues, billing determinants, and related items were developed
20 by collecting the actual usage and customer counts billed in each month of the test year and
21 applied them to the existing rate structure.⁵ If Evergy is not able to provide the information
22 described above, it is unclear how or if Evergy is able to apply the correct rates to the correct
23 billing determinants in revenue calculations for general rate cases.

⁴ Case No's ER-2022-0129 and ER-2022-0130.

⁵ Direct testimony of Evergy witness, Marisol Miller page 29, lines16-18.

1 **IMPORTANCE OF ACCURATE BILLING DETERMINANTS**

2 Q. Why is it important to have accurate starting billing determinants⁶ for the
3 ordered test year and other relevant test periods in a rate case?

4 A. The starting billing determinants are utilized to calculate test-year rate revenue.
5 Normalized and annualized test year revenue is used to determine the increase that it is
6 reasonable for a utility to receive. The accuracy of the rate revenue component of the net cost
7 of service in a general rate case, as well as the rate design to recover the cost of service, is
8 limited by the accuracy of the underlying billing determinants. This is further discussed by
9 Staff witness Sarah L.K. Lange.

10 As discussed in my rebuttal testimony in Evergy's last rate case, attached to this
11 testimony as Schedule KC-r2, it is important to start with the actual kWh (by block if
12 applicable), customer charge counts, and revenue that the Company billed during the test year.⁷
13 Each rate class has various different rate codes that customers may be on in a given month
14 and/or bill cycle. As can be seen in the chart below, Evergy Missouri West residential rates
15 vary by rate code.⁸

⁶ Billing determinants are what a revenue requirement is divided by to produce rates. Billing determinants are the combination of components to which rates are applied to calculate the customer's bill. Examples of billing determinant components are customer charge, usage, facilities, demand, reactive demand, net metering, and parallel generation.

⁷ In ER-2022-0130, the ordered test year was 12 months ending June 2021.

⁸ The tariff rate class is further broken down by rate codes that has different rate structures and rates.

Rebuttal Testimony of
Kim Cox

1

Evegry Missouri West Residential Service					
Rate Code					
MORG, with Net Metering, MORN			Time of use -two period		
Customer Charge	\$ 12.00		Customer Charge	\$ 12.00	
Energy Charge per kWh			Energy Charge per pricing period (per kWh)		
	<u>Summer Season</u>	<u>Winter Season</u>		<u>Summer Season</u>	
First 600 kWh	\$0.11577	\$ 0.10465	On-peak	\$0.32412	
Next 400 kWh	\$0.11577	\$ 0.08255		\$0.08103	
Over 1000 kWh	\$0.12623	\$ 0.08255			
				<u>Winter Season</u>	
MORH, with Net Metering, MORN			Off-peak	\$0.09466	
Customer Charge	\$ 12.00		Super-Off peak	\$0.04733	
Energy Charge per kWh			MORPA, with Net Metering MORPANM, with Parallel Generation MORPAPG		
	<u>Summer Season</u>	<u>Winter Season</u>	Customer Charge	\$ 12.00	
First 600 kWh	\$0.12623	\$ 0.10465	Energy Charge per kWh		
Next 400 kWh	\$0.12623	\$ 0.06387		<u>Summer Season</u>	<u>Winter Season</u>
Over 1000 kWh	\$0.12623	\$ 0.05297	First 600 kWh	\$0.11829	\$0.09784
			Next 400 kWh	\$0.11829	\$0.07718
Other use			Over 1000 kWh	\$0.12829	\$0.07718
Customer Charge	\$ 12.00				
Energy Charge per kWh				<u>Summer Season</u>	<u>Winter Season</u>
	<u>Summer Season</u>	<u>Winter Season</u>	Peak Adjustment Charge per On-Peak kWh	\$0.01000	\$0.00250
First 600 kWh	\$0.15520	\$ 0.11638	Peak Adjustment Credit per Super Off-Peak kWh	\$0.01000	\$0.01000
Time of use -three period					
Customer Charge	\$ 12.00				
Energy Charge per pricing period (per kWh)					
	<u>Summer Season</u>	<u>Winter Season</u>			
First 600 kWh	\$0.28129	\$ 0.22892			
Next 400 kWh	\$0.09376	\$ 0.09237			
Over 1000 kWh	\$0.04688	\$ 0.03881			

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It is imperative that the monthly billing determinants that Evegry provides Staff are accurate because it is those determinants that are used in the rate revenue calculation and billing determinant calculation.⁹

The first step in calculating the rate revenues is to determine the revenues collected by the utility. The only way to accurately do this, is to have the actual monthly billing determinants by rate code for the test year and the update period if applicable. The tariff rates by rate class, rate code, and season,¹⁰ if applicable, are applied to produce the starting revenue that the Company billed its customers.

⁹ The billing determinants are also used for the weather normalization adjustment, net system input calculation (including information for calculating the fuel adjustment clause (FAC) base factor), and also to be used in class cost of service studies.

¹⁰ As an example, the tariff rates for Evegry West are shown on page 6 of this testimony.

1 Q. What rate revenue adjustments are impacted by the starting billing
2 determinants?

3 A. The update period adjustment, rate switcher adjustment, weather normalization
4 adjustment, 365 days adjustment, Missouri Energy Efficiency Investment Act (“MEEIA”)
5 adjustment, and the customer growth adjustment are impacted by the starting billing
6 determinants.¹¹

7 Q. Why is Staff requesting the number of customers served for first and last day of
8 each month for each rate code?

9 A. Staff initially requested this information due to Evergy’s failure to provide the
10 necessary information in several rate cases to calculate the “customer growth” adjustment.¹²
11 The customer growth adjustment in a general rate case reflects the impact in change of customer
12 level, kWh sales, kW demand, and rate revenue as if the growth in customers had existed
13 throughout the entire period. Since the time that Evergy committed to provide this information
14 in the August 2022 Stipulation,¹³ the Commission ordered time-based rate structures for all
15 residential customers. Evergy customers that have been switched to the time of use (“TOU”)
16 rate¹⁴ as of November 27, 2023 and customers that have switched from the original selection¹⁵
17 is reflected below.

¹¹ This list may not affect both sales and rate revenue dollars and not all rate classes are subject to all adjustments.

¹² Schedule KC-r3 attached to this testimony are the data request and responses to Case Nos. ER-2010-0355, ER-2012-0174, ER-2014-0370, ER-2016-0285, and ER-2018-0145.

¹³ Case No. ER-2022-0129 and Case No. ER-2022-0130, Stipulation and Agreement.

¹⁴ Evergy Mandatory Residential Customer TOU Implementation filed on November 27, 2023, page 5.

¹⁵ Evergy Mandatory Residential Customer TOU Implementation filed on November 27, 2023, page 7.

1

Time of Use Rate Enrollments

Active Customers on TOU rates as of November 27, 2023

Rate Plan	MO West	MO Metro	Total
Nights & Weekends Max Plan (3-period/high differential)	15,528	8,002	23,530
Nights & Weekends Plan* (3-period)	7,746	5,556	13,302
Default Time Based Plan (peak adjustment charge/low diff/default)	228,729	227,033	455,762
Summer Peak Time Based Plan (2-period)	26,715	27,823	54,538
EV Only Plan (separately metered/3-period/high differential EV rate)	-	-	-
Total	278,718	268,414	547,132

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Over 380K customers automatically transitioned to TOU rates by bill cycle starting 10/13/23.

3

Rate Switching

Number of rate changes by Customer from original selection	Number of Customers who have made changes	
	Missouri West	Missouri Metro
Data as of 11/3/23		
1 rate change	4,515	3,372
2 rate changes	322	231
3 rate changes	29	21
4 rate changes	6	3
5 rate changes	1	1
10 rate changes		1

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With the implementation, it is expected that a significant number of residential customers will continue to switch to different rates within Evergy's test year.¹⁶ In Evergy's

¹⁶ The test year will be the 12 months ordered within the next general case. Rate switchers is an adjustment that generally occurs within rate cases. Customers may start on one rate code and move to another rate code in a month and or bill cycle. The adjustment, which is called a normalization adjustment moves the customer to where they ended during the test year or update period if applicable.

1 last general rate cases, Case Nos. ER-2022-0129 and ER-2022-0130, Staff asked DR
2 No. 0222 below.

3 Please provide a list of all rate codes for the Residential, Small General,
4 and Large General service rates that switched rate classes during the 12
5 months ending December 31, 2021. Please provide all tariffed billing
6 components per customer per month of the requested time period and
7 include that rate schedule the customer is currently serviced on, the rate
8 schedule the customer switched from and the date the customer switched.

9 Evergy's response was as follows:

10 Given the vast number of customers included in the remaining rate classes, this
11 data is not available for Residential, Small General and Large General service rates¹⁷.

12 Given this DR response in the last rate case and the implementation of the time-
13 based rate structure for all residential customers, it is even more critical to get the data
14 that Evergy committed to providing. Evergy's customers may choose to be on different
15 rate codes (that have different rates) as often as they choose. Staff will need to track the
16 customers at least monthly, if not more frequently, by rate code to calculate accurate
17 annualized and normalized billing determinants and revenues that are utilized for further
18 analysis. Additional needs for this information are discussed by Staff witnesses Michael
19 Stahlman regarding use in weather normalization and net system input ("NSI"),
20 J Luebbert regarding MEEIA, and Sarah Lange regarding class and customer cost of
21 service, rate design, and TOU rate evaluation.

22 **CONCLUSION**

23 Q. What are Staff's conclusions on these issues?

¹⁷ Evergy provided the switchers for the Large Power class only.

1 A. The number of customers served by rate code for the first day of the month and
2 the last day of the month will enable rate revenues and the adjustments that are applied to be as
3 accurate as possible.

4 Q. Does Staff have any recommendations, based on its conclusions?

5 A. Staff recommends the Commission order Evergy to have the discussions with
6 Staff that Ms. Dragoo suggests in her direct testimony and to order Evergy to provide the data
7 requested in 2, 3, and 4, which Evergy states is more reasonable and should only be provided
8 with support from the Commission.¹⁸ To the extent that Evergy is unable to retrieve this
9 information after a day, month, or billing cycle has passed, Evergy should retain that
10 information so that it is available for use in future general rate cases.

11 Q. Does this conclude your rebuttal testimony?

12 A. Yes.

¹⁸ Bradley Lutz direct testimony, page 24, lines 6-8.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Requests for Customer)
Account Data Production from Evergy)
Metro, Inc. d/b/a Evergy Missouri Metro and) Case No. EO-2024-0002
Evergy Missouri West, Inc. d/b/a Evergy)
Missouri West)

AFFIDAVIT OF KIM COX

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW KIM COX and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Sarah L.K. Lange*; and that the same is true and correct according to her best knowledge and belief.

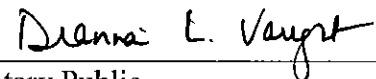
Further the Affiant sayeth not.


_____)
KIM COX

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 14th day of December 2023.

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2027 Commission Number: 15207377


_____)
Notary Public

KIM COX

Education and Employment Background and Credentials

I attended Central Missouri State University at Warrensburg, Missouri. In May 1996, I received a Bachelor of Science degree.

I am currently employed as a Senior Research/Data Analyst with the Tariff/Rate Design Department within the Industry Analysis Division of the Missouri Public Service Commission (Commission). I have been employed by the Commission since July, 2009. From July 2009 to June 2013, I worked in the Tariffs/Rate Design Section of the Energy Unit as a Rate and Tariff Examiner III, where my duties consisted of analyzing applications, reviewing tariffs and making recommendations based upon those evaluations. On June 16, 2013, I assumed the position of a Utility Policy Analyst II (which is now reclassified as a Senior Research/Data Analyst) within the same Section, where my duties consist of coordinating highly complex activities, analyzing applications, reviewing tariffs, and making recommendations based upon my evaluations. I currently serve on the NARUC Staff Subcommittee on Rate Design. Prior to joining the Commission, I held the position of a Quality Assurance Analyst in the regulatory field for ten years.

KIM COX

Summary of Case Involvement

	Company	Issue	Type of Filing
GR-2009-0434	The Empire District Gas Company	Weather Normalized Sales and Coincident-Peak Day Demand	Staff Report
GR-2010-0171	Laclede Gas Company	Weather Normalized Sales, Blocks and Coincident-Peak Day Demand	Staff Report
GR-2010-0171	Laclede Gas Company	Weather Normalized Sales	Rebuttal
GR-2010-0363	Union Electric d/b/a AmerenUE	Weather Normalized Sales, Blocks and Coincident-Peak Day Demand	Staff Report
GR-2010-0347	Southern Missouri Natural Gas	Weather Normalized Sales	Staff Report
GR-2010-0192	Atmos	Weather Normalized Sales and Coincident-Peak Day Demand	Staff Report
HR-2011-0241	Veolia	Weather Normalized Sales	Staff Report
ER-2012-0175	KCP&L and GMO	L&P Normalization and Annualization	Staff Report
GR-2014-0007 Coordinated	Missouri Gas Energy	Direct COS sponsor of Weather, Weather Normalization and Large Volume Customer Revenue Adjustment	Direct Testimony
GR-2014-0007 Coordinated	Missouri Gas Energy	Direct CCOS sponsor of Rate Design, Miscellaneous Tariff Issues, School Transportation Capacity, Gas Supply Incentive Plan and Staff's CCOS	Direct Testimony
GR-2014-0086	Summit Natural Gas	Lake Ozark Transportation	Staff Report
GR-2014-0152	Liberty Utilities	Special Contract, Large and Industrial Customers	Staff Report, Rebuttal and Surrebuttal
ER-2016-0023	Empire	Large Power Feed Mill Annualization	Staff Report
GR-2017-0215 and GR-2017-0216	Spire Missouri Inc.	Executive Summary, Background, Test Year/True-Up Period and Staff's Revenue Requirement Recommendation	Staff Report

	Company	Issue	Type of Filing
ER-2018-0145 and ER-2018-0146	Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company	Rate Revenues Introduction, The Development of Rate Revenue, Regulatory Adjustments to Test Year Sales and Rate Revenue, Customer Growth, and Adjustment for Non-Missouri classes	Staff Report
GR-2019-0077	Union Electric Company, d/b/a Ameren Missouri	Class Cost of Service, Rate Design and Bill Format Recommendation	Staff Report
ER-2019-0335	Union Electric Company, d/b/a Ameren Missouri	Cost of Service, Update Period Adjustments, Large Customer Annualization, MEEIA Revenue Adjustment, Weather Normalization of Revenue and 365 Day Adjustment	Staff Report
GR-2021-0108	Spire Missouri Inc.	Cost of Service, Large Customer Annualization, Weather Normalization of Revenue and 365 Day Adjustment, Rate Switching Adjustment and Growth Adjustment	Staff Report and Surrebuttal
ER-2021-0240	Union Electric Company, d/b/a Ameren Missouri	Cost of Service, Update Period Adjustments, Community Solar, Rate Switching, MEEIA Revenue Adjustment, Weather Normalization of Revenue and 365 Day Adjustment, and Growth Adjustment	Staff Report and Rebuttal Testimony
ER-2021-0312	The Empire District Electric Company, d/b/a Liberty	Cost of Service, Update Period Adjustments, Weather Normalization of Revenue and 365 Day Adjustment, Rate Switching, Customer Growth, Adjustments for Non-Missouri classes	Staff Report and Rebuttal Testimony

	Company	Issue	Type of Filing
ER-2022-0129 & 0130	Evergy Metro, Inc. d/b/a Evergy Missouri Metro & Evergy Missouri West, Inc. d/b/a Evergy Missouri West	Test year revenues, Update Period Adjustment, Rate Switchers, Weather Normalization, 365 days adjustment, MEEIA Revenue Adjustment, and Customer Growth	Direct Testimony, Rebuttal and Surrebuttal/True- up
ER-2022-0337	Union Electric Company, d/b/a Ameren Missouri	Cost of Service, Update Period Adjustments, Community Solar, Rate Switching, MEEIA Revenue Adjustment, Weather Normalization of Revenue and 365 Day Adjustment, and Growth Adjustment	Direct Testimony, Rebuttal and Surrebuttal/True- up

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Sponsoring Party: *MoPSC Staff*
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Date Testimony Prepared: *July 13, 2022*

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INDUSTRY ANALYSIS DIVISION
TARIFF/RATE DESIGN DEPARTMENT

REBUTTAL TESTIMONY

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Case No. ER-2022-0129

Evergy Missouri West, Inc. d/b/a Evergy Missouri West
Case No. ER-2022-0130

Jefferson City, Missouri
July 2022

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KIM COX

**EVERGY METRO, INC. D/B/A EVERGY MISSOURI METRO
CASE NO. ER-2022-0129**

**EVERGY MISSOURI WEST, INC. D/B/A EVERGY MISSOURI WEST
CASE NO. ER-2022-0130**

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1 **REBUTTAL TESTIMONY**

2 **OF**

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4 **EVERGY METRO, INC. D/B/A EVERGY MISSOURI METRO**
5 **CASE NO. ER-2022-0129**

6
7 **EVERGY MISSOURI WEST, INC. D/B/A EVERGY MISSOURI WEST**
8 **CASE NO. ER-2022-0130**

9 Q. Please state your name and business address.

10 A. Kim Cox, 200 Madison Street, Jefferson City, Missouri 65101.

11 Q. By whom are you employed and in what capacity?

12 A. I am employed by the Missouri Public Service Commission (“Commission”) as
13 a Research/Data Analyst in the Tariff and Rate Design Department of the Industry Analysis
14 Division of the Commission Staff.

15 Q. Have you previously filed testimony in this case?

16 A. Yes. I provided direct testimony as part of the Cost of Service on June 8, 2022.

17 Q. What is the purpose of your rebuttal testimony?

18 A. The purpose of my rebuttal testimony is to:

- 19 1. Address Company witness Marisol E. Miller’s changes to test year¹ actual
20 billing determinants.
21 2. Address Company witness Albert R. Bass, JR.’s customer growth adjustment.
22 3. Address Company witness Marisol E. Miller applying a weather normalization
23 factor to net metering and parallel generation customers.

¹ Twelve months ending June 2021.

TEST YEAR ACTUAL BILLING DETERMINANTS

Q. What are Evergy West (“EMW”) and Evergy Metro (“EMM”) residential actual billing determinants for the test year?

A. Below is the actual residential billing determinants for the test year² that consist of seven tariff rate codes³ for EMW⁴ and six tariff rate codes⁵ for EMM⁶ and the revenues associated with them.

West Actuals by Class				Metro Actuals by Class			
RS	Customer/Bill Count	3,435,123	\$ -	RS	Customer/Bill Count	3,059,966	\$ -
RS	Customer Charge	3,457,186	\$ 39,934,234	RS	Customer Charge 1 Summer	1,043,460	\$ 12,061,067
RS	Energy Charge - Block 1	1,771,808,259	\$ 184,309,623	RS	Customer Charge 1 Winter	2,049,238	\$ 23,686,731
RS	Energy Charge - Block 2	718,623,478	\$ 62,852,672	RS	Energy Charge - Summer - Blk 1	537,670,087	\$ 73,070,577
RS	Energy Charge - Block 3	1,076,402,030	\$ 88,280,504	RS	Energy Charge - Summer - Blk 2	230,644,751	\$ 31,321,163
RS	Energy Charge - On Peak	3,896,368	\$ 927,549	RS	Energy Charge - Summer - Blk 3	272,761,143	\$ 39,956,423
RS	Energy Charge - Off Peak	18,817,419	\$ 1,652,001	RS	Energy Charge - Winter - Blk 1	932,297,116	\$ 106,566,865
RS	Net Metering Credit	4,995,630	\$ (115,036)	RS	Energy Charge - Winter - Blk 2	258,445,971	\$ 21,095,369
RS	Energy Charge - Super Off Peak	5,874,910	\$ 231,444	RS	Energy Charge - Winter - Blk 3	309,976,819	\$ 19,996,576
RS	FAC/ECA Charge	3,595,422,465	\$ 2,100,930	RS	Energy Charge - Winter Separate Heat	58,586,656	\$ 3,722,010
RS	DSIM Charge	3,595,422,465	\$ 17,677,128	RS	Energy Charge - Off Peak Summer	4,798,695	\$ 520,997
RS	RESRAM Chg	3,595,422,465	\$ 3,205,046	RS	Energy Charge - Off Peak Winter	7,288,079	\$ 759,564
RS	Parallel Generation Credit	2,788	\$ (67)	RS	Energy Charge - On Peak Summer	1,068,333	\$ 342,747
RS	Bill Total	3,595,422,465	\$ 401,056,028	RS	Energy Charge - On Peak Winter	1,377,246	\$ 366,003
				RS	Net Metering Credit Summer	654,221	\$ (15,308)
				RS	Net Metering Credit Winter	998,253	\$ (22,496)
				RS	Energy Charge - Super Off Peak Summer	1,453,785	\$ 78,736
				RS	Energy Charge - Super Off Peak Winter	2,442,975	\$ 109,812
				RS	FAC/ECA Charge	2,618,811,657	\$ 714,767
				RS	DSIM Charge	2,618,811,657	\$ 16,178,629
				RS	Parallel Generation Credit	3,688	\$ (84)
				RS	Bill Total	2,618,811,657	\$ 350,510,149

Q. What residential test year actual billing determinants did the Company use for the test year rate revenues?

² 12 months ending June 2021.

³ Evergy West’s residential class consist of the following rate codes: MORG, MORH, MORO, MORN, MORHN, MORHP, and MORT.

⁴ Ms. Miller’s workpaper, CONFIDENTIAL_Actuals –MO West YE 20210630, Sheet Actuals by Class.

⁵ Evergy Metro’s residential class consist of the following rate codes: 1RS1A, 1RS6A, 1RS2A, 1TE1A, 1RTOU, and 1RO1A.

⁶ Ms. Miller’s workpaper, Actuals YE 20210630-MO Metro, Sheet UI Actual by Class.

Rebuttal Testimony of
Kim Cox

1

A.

2

West Actuals by Class				Metro Actuals by Class			
RS	Customer/Bill Count	3,435,123.00		RS	Customer/Bill Count	3,059,702.00	
RS	Customer Charge	3,457,185.50	39,653,938.28	RS	Customer Charge 1 Summer	1,042,993.51	11,963,101.57
RS	Energy Charge - Block 1	1,765,019,923.24	183,342,164.98	RS	Customer Charge 1 Winter	2,048,336.12	23,494,729.07
RS	Energy Charge - Block 2	720,757,991.09	63,037,901.49	RS	Energy Charge - Summer - Blk 1	537,456,806.74	73,030,504.61
RS	Energy Charge - Block 3	1,081,055,852.83	88,679,490.20	RS	Energy Charge - Summer - Blk 2	230,669,253.15	31,324,400.16
RS	Energy Charge - On Peak	3,896,368.46	927,549.19	RS	Energy Charge - Summer - Blk 3	272,867,911.39	39,972,665.78
RS	Energy Charge - Off Peak	18,817,419.42	1,652,000.91	RS	Energy Charge - Winter - Blk 1	942,010,734.61	106,786,155.80
RS	Net Metering Credit	4,995,630.23	(115,036.41)	RS	Energy Charge -Winter - Blk 2	271,386,195.35	22,472,252.05
RS	Energy Charge - Super Off Peak	5,874,910.30	231,443.76	RS	Energy Charge -Winter - Blk 3	345,460,897.76	22,230,287.11
RS	FAC/ECA Charge	3,595,422,465.34	2,100,930.43	RS	Energy Charge - Winter Separate Heat		
RS	DSIM Charge	3,595,422,465.34	17,677,128.34	RS	Energy Charge - Off Peak Summer	4,680,331.75	507,019.80
RS	RESRAM Chg	3,595,422,465.34	3,205,046.23	RS	Energy Charge - Off Peak Winter	7,288,078.88	759,563.53
RS	Parallel Generation Credit	2,788.44	(66.92)	RS	Energy Charge - On Peak Summer	1,029,038.09	334,417.13
RS	Bill Total	3,595,422,465	400,392,490.48	RS	Energy Charge - On Peak Winter	1,377,245.98	366,003.29
				RS	Net Metering Credit Summer	654,221.22	(15,308.10)
				RS	Net Metering Credit Winter	998,252.71	(22,496.10)
				RS	Energy Charge - Super Off Peak Summer	1,453,785.04	78,736.15
				RS	Energy Charge - Super Off Peak Winter	2,442,974.76	109,811.51
				RS	FAC/ECA Charge	2,618,123,253.95	714,551.47
				RS	DSIM Charge	2,618,123,253.95	16,174,374.79
				RS	Parallel Generation Credit	3,687.62	(84.33)
				RS	Bill Total	2,618,123,254	350,280,685.30

3

4

5

Q. Why did the Company use different actual billing determinants for the test year?

6

A. The actual billing determinants that the Company used included the movement of rate codes that have different rates. Every witness, Ms. Miller proposes elimination of some grandfathered/frozen rate codes and other rate codes.⁷ Ms. Miller's workpapers⁸ show them as migration adds and migration subtracts.

10

Q. What revenue impact did the proposal Ms. Miller made have on test year

11

starting revenues?

⁷ EMW, Ms. Miller direct testimony, page 4 and EMM, Ms. Miller direct testimony, page 5.

⁸ Workpaper, CONFIDENTIAL BEST FIT DETS_Billed Revenue – MO West YE 20210630 and BEST FIT DETS_Billed Revenue TYE 20210630 – MO Metro.

1 A. The overall residential revenue impact is a reduction for EMW of \$663,537
2 and \$224,993 for EMM. The impact not only affected the residential class, it also impacted the
3 small general class, the medium general class (EMM only) and the large general class⁹.

4 Q. Did Staff make the same adjustment to starting actual billing determinants
5 and revenue?

6 A. No. Staff's starting kWh and revenue is what the Company billed during the
7 test year. For purposes of starting revenue and billing determinants, Staff did not eliminate any
8 rate codes, as Ms. Miller did, because those rate codes and the tariffed rates were effective
9 during the test period. After normalizing and annualizing revenues and billing determinants,
10 Staff did apply adjustments to the determinants to calculate the revenue impact of case
11 consolidations. This is addressed in the Class Cost of Service Direct Testimony of Sarah Lange.

12 Q. How does changing the starting billing determinants and revenues impact the
13 remaining revenue and billing determinant annualization and normalization process?

14 A. It impacts the use per customer ("UPC") by rate code by month that is then used
15 to determine the normal use per customer ("NUPC"). For example, Ms. Miller eliminated the
16 MORO rate code¹⁰ and added the billing determinants to the MORG rate code to develop test
17 year "modified actuals." The MORG rate code UPC for the total 12 months ending June 2021,
18 before the migration was 892 and after the migration the UPC was 879. The MORO rate code
19 UPC was 314. Ms. Miller used her calculated UPC and NUPC in each of her adjustments.¹¹

20 Q. What role do the UPC and NUPC have in normalization and annualization?

⁹ The aggregate revenue impact is -\$649,274 for EMW and \$34,493 for EMM.

¹⁰ MORO rate code is available to residential customers who do not qualify under any other residential rates. They generally will be those with well pumps, barns, machine sheds, detached garages and home workshops. The meter is not connected to a single or multiple occupancy dwelling unit.

¹¹ Ms. Miller adjustments to each rate code is COVID, weather normalization, 365 days, rate switcher, energy efficiency, and customer growth.

1 A. The UPC is multiplied by the normalization and annualization factors to
2 determine the NUPC. The relationship between UPC and NUPC is used to adjust the total
3 actual blocked billing determinants to equal the normalized and annualized monthly kWh.
4 The relationship between percentage of usage priced in the first block and the second block rate
5 block is used to distribute normalized and annualized monthly kWh to the rate blocks.

6 Q. Did the Company develop its normalization and annualization factors using the
7 “modified actuals?”

8 A. It appears that the actual billing determinants for each class were used to produce
9 the factors that Ms. Miller applied to each modified rate code. In some instances, the migrations
10 moved customers from one class to a different class. Therefore, the normalization and
11 annualization factor produced on the class level was applied to a rate code in a different class.¹²

12 Q. Why is it important that the normalized and annualized usage in each block in
13 each class is accurate?

14 A. The customer could be billed a different rate depending on where its usage falls.
15 Below is an example, the MORG rate code is billed the following energy charge rates.

16 **ENERGY CHARGE:**

	<u>Summer Season</u>	<u>Winter Season</u>
17 First 600 kWh:	\$0.10938 per kWh	\$0.09888 per kWh
18 Next 400 kWh:	\$0.10938 per kWh	\$0.07800 per kWh
19 Over 1000 kWh:	\$0.11927 per kWh	\$0.07800 per kWh
20		
21		

¹² Staff is not able to determine the impact this would have on revenues and normalized and annualized billing determinants.

Rebuttal Testimony of
Kim Cox

1 Q. If the MORO customers are not moved to the MORG rate code, can Ms. Miller's
2 adjustment be readily reversed?

3 A. No. As will be addressed in the Rebuttal testimony of Sarah Lange, it is not
4 clear that all MORO customers are eligible for service on the MORG rate code under Evergy's
5 proposed availability language. However, because the Evergy UPC and NUPC relied upon the
6 inclusion of those customers in the normalization and annualization process, the normalized
7 and annualized MORG revenues and determinants will be erroneous.

8 Q. As used in Evergy's workpapers and testimony, what is the difference between
9 a migration and a rate switcher adjustment?

10 A. Based off of Ms. Miller's workpapers,¹³ a migration is the movement of a rate
11 code to another rate code due to a proposal of an elimination of that rate code and restating the
12 billing determinants and revenues as the test year.

13 Ms. Miller's testimony,¹⁴ refers to the migrated customers as "switchers;" however, in
14 Mr. Bass' testimony he describes rate switchers as "Each year a small percentage of customers
15 are switched from their current tariff to another that is expected to reduce their electric bills."
16 He goes on to say that for EMW, "there was one LP customer and for EMM, there were
17 no LP customer who switched rates during the test year."

18 Staff has typically described the rate switcher adjustment as an adjustment made to
19 account for any customer that switched rate codes or classes during the test year and or
20 update period.

¹³ CONFIDENTIAL-BEST FIT DETS_Billed Revenue – MO West and BEST FIT DETS_Billed Revenue TYE
20210630 – MO Metro.

¹⁴ ER-2022-0130, page 13 and ER-2022-0129, page 22.

1 Q. Does the order of operations employed by Staff result in more accurate
2 determinants overall than the order of operations employed by Ms. Miller's?

3 A. Yes. The processes employed by Staff and Ms. Miller differ in whether
4 complex adjustments are made on actual data, or modified data. A simple outline is
5 provided below:

Company Approach	Staff Approach
Modified actual determinants	Used actual determinants
Calculated normalizations and annualizations by reconfigured rate codes	Calculated normalizations and annualizations by actual rate codes
Applied normalizations and annualizations to reconfigured rate codes	Applied normalizations and annualizations to actual rate codes
Ending Revenues and Determinants sponsored by Marisol Miller	Revenues and Determinants Sponsored by Kim Cox
	Residential Classes consolidated and Revenue Impact calculated by Sarah Lange

6
7 For purposes of test year billing determinants and revenue, Staff recommends that it is
8 more reasonable to rely on test year actuals. Staff did not eliminate rate codes from the test
9 year, and Staff's test year billing determinants and revenues are what the Company billed their
10 customers during the 12 months ending June 2021. Relying on the actual data for the
11 normalization and annualization process maintains the accuracy of those processes. In addition,
12 under Staff's approach, the revenue impact of whatever consolidations the Commission orders
13 will be incorporated in the rate design process. Under the Evergy approach, if the Commission
14 ultimately does not order consolidation of the MORO rate code into the MORG rate code – or
15 if the Commission determines that all MORO customers are not eligible for MORG service –
16 the Company approach lacks the flexibility to accommodate that outcome. Staff witness

1 Sarah Lange discusses the revenue impact of Staff's recommended elimination of rate codes in
2 her direct testimony. Staff recommends that the Commission rely on Staff's test year starting
3 billing determinants and revenue.

4 **GROWTH ADJUSTMENT**

5 Q. Did Staff make a growth adjustment?

6 A. Yes. As stated in my direct testimony,¹⁵ Staff made a customer growth
7 adjustment to EMM and EMW to reflect the impact in change of customer levels on the update
8 period kWh sales, kW demand, and rate revenue as if the customers taking service at the end
9 of November 2021 had existed throughout the twelve months ending December 31,2021.
10 Staff used the number of customer charges per month for the customer growth
11 adjustment calculation.

12 Q. Did Evergy make the same adjustment?

13 A. No. Mr. Bass used the number of customer bills and not the number of customer
14 charges per month to calculate a two month average for each month of the test year. He then
15 performed a trend analysis (with the new monthly average number of bills) to get a projected
16 number of bills as of May 2022. The growth factor that was applied was the new monthly
17 average divided by the projected number of bills as of May 2022. Mr. Bass does state that he
18 will use the actual number of customers when the numbers become available.

19 Q. Does Staff agree with using the number of customer bills for the customer
20 growth adjustment?

21 A. No. In order to determine revenues that account for the customer charge, the
22 customer charge counts should be used to calculate the customer growth adjustment.

¹⁵ Direct Testimony of Kim Cox, page 6, lines 10-23 and page 7, lines 1-6.

Rebuttal Testimony of
Kim Cox

1 Below are the residential bill count and the residential customer charge count for EMW test
2 year. There is a significant difference each month.

	Jul - 2020	Aug - 2020	Sep - 2020	Oct - 2020	Nov - 2020	Dec - 2020	Jan - 2021	Feb - 2021	Mar - 2021	Apr - 2021	May - 2021	Jun - 2021
Customer/Bill Count	284,349	283,916	284,589	285,198	285,698	286,882	287,735	288,002	287,691	288,333	286,810	285,920
Customer Charge	286,752	286,005	286,913	287,116	287,651	289,020	289,333	289,745	289,316	290,866	288,951	285,520
	(2,403)	(2,089)	(2,324)	(1,918)	(1,953)	(2,138)	(1,598)	(1,743)	(1,625)	(2,533)	(2,141)	400

3
4 Q. Does Staff agree that the growth adjustment should be updated in true up direct?
5 A. Staff noted in its direct filing that we will analyze customer charge counts
6 through the true up period and adjust accordingly in true up direct. If Evergy does not update
7 its growth adjustment by customer charge counts, Staff recommends the Commission rely on
8 Staff's growth adjustment.

9 **NET METERING AND PARALLEL GENERATION CUSTOMERS**

10 Q. What is net metering and parallel generation?
11 A. EMW's tariff¹⁶ states, "net metering means using metering equipment sufficient
12 to measure the difference between the electrical energy supplied to a Customer-Generator by
13 the Company and the electrical energy supplied by the Customer-Generator to the Company
14 over the applicable billing period." EMM's tariff¹⁷ provides the same definition. EMM and
15 EMW do not have a parallel generation definition in the tariff however; both have an
16 applicability that states:
17 Applicable to a "Qualifying Facility" who contracts for service supplied at one point of
18 delivery where part or all of the electrical requirements of the Customer are provided by the

¹⁶ P.S.C. MO. No. 1, 8th Revised Sheet No. 110, Definitions, F.

¹⁷ P.S.C. MO. No. 7, Revised Sheet No. 34, Definitions, F.

1 Customer on the premises, and where the Customers source of electricity is connected for
2 parallel operation of the Customer's system with the system of the Company.

3 Q. Are the net metering and parallel generation customers in a rate code
4 by themselves?

5 A. It varies by entity. EMM has the customers combined and EMW has them
6 separated. As noted in my direct testimony on page 7, Staff is recommending that the
7 Commission order EMM to separate the customers billed a net metering and or parallel
8 generation credit.

9 Q. Can you please provide an example of an EMW net metering rate code usage
10 and revenues?

11 A. Yes. The rate code MORN for the test year had a 1,563,191 kWh net metering
12 credit that computed to -\$35,795. The MORN rate code total kWh during the test year
13 was 6,429,950, which takes into account the net metering kWh credit.

14 Q. Please explain how the customer is billed.

15 A. If the electricity supplied by the Company is greater than the electricity
16 generated by the customer, the customer is billed for the net usage. If the customer generates
17 more electricity than supplied by the Company, the customer will be credited based on the
18 excess generation at the applicable rate schedule.

19 Q. Did Ms. Miller apply Mr. Bass' computed weather normalization factor to the
20 net kWh for the net metering and parallel generation customers?

21 A. Yes.

22 Q. Does Staff agree with adjusting the net kWh for weather?

1 A. No. The amount of kWh the customer uses in any given month is adjusted for
2 net metering and therefore is not true representation of the amount of kWh used in that month.

3 Q. Did Staff apply a weather normalization factor to the net kWh?

4 A. For EMW, Staff did not apply the weather normalization factor to the rate codes
5 that have net metering and or parallel generation. Staff did apply the weather normalization
6 factor¹⁸ to EMM because the rate codes do not differentiate net metering and parallel generation
7 customers. Therefore, Staff recommends the Commission use Staff's weather normalization
8 adjustment for EMM and EMW and order EMM to separate the customers billed net metering
9 and parallel generation.

10 **CONCLUSION**

11
12 Q. What is Staff's conclusion on these issues?

13 A. Staff recommends that the Commission rely on Staff's test year starting billing
14 determinants and revenue that account for how customers were billed during the 12 months,
15 accept Staff's growth adjustment utilizing customer charge counts, and updated in true up
16 direct, and accept Staff's weather normalization adjustment that only applies to customers
17 without net metering and or parallel generation for EMW and order EMM to separate net
18 metering and or parallel generation customers.

19 Q. Does this conclude your rebuttal testimony?

20 A. Yes.

¹⁸ Staff witness, Michael Stahlman provided the weather normalization factor and the 365 days, which was combined with the MEEIA adjustment that was provided by Staff witness, J Luebbert.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a Evergy)
Missouri Metro's Request for Authority to) Case No. ER-2022-0129
Implement a General Rate Increase for Electric)
Service)

In the Matter of Evergy Missouri West, Inc.)
d/b/a Evergy Missouri West's Request for) Case No. ER-2022-0130
Authority to Implement a General Rate)
Increase for Electric Service)

AFFIDAVIT OF KIM COX

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW KIM COX and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Kim Cox*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

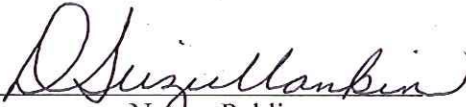


KIM COX

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 8th day of July, 2022.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070



Notary Public

Case No. ER-2010-0355

Question No. :0185

Please provide for each month during the test year and each month following throughout the case, separately for Missouri and Kansas jurisdictions, the number of customers in each customer class. For each month provided, specify whether the count applies to the beginning or the end of the month. (Previous Case No. ER-2009-0089, DR 255)

RESPONSE (7/26/2010):

The attached spreadsheet includes customer counts from January 2010 through June 2010. Customer counts during the test year, ending December 2009, were provided as work papers during the initial filing of this case.

Customer counts as utilized within rate cases are not taken at a single point in time. Instead, it is a count of all customers that billed during the month.

Case No. ER-2012-0174

Question No. :0139

Please provide for each month during the test year and each month following throughout the case, separately for Missouri and Kansas jurisdictions, the number of customers in each customer class. For each month provided, specify whether the customer count applies to the beginning or the end of the month. (Previous Case Nos. ER-2010-0355 DR 185 and ER-2009-0089, DR 255)

RESPONSE (3/19/2012):

The attached spreadsheet includes customer counts from October 2010 through September 2011.

Customer counts as utilized within rate cases are not taken at a single point in time. Instead, it is a count of all customers that billed during the month.

Case No. ER-2014-0370

Question No. :0330

Please provide for each month during the test year and each month following throughout the case, separately for Missouri and Kansas jurisdictions, the number of customers in each customer class. For each month provided, specify whether the customer count applies to the beginning or the end of the month. (Case No. ER-2009-0089, DR 255, Case Nos. ER-2010-0355 DR 185, Case No. ER-2012-0174 DR 139)

Response (2/10/2015):

The attached spreadsheet, Q0330_Customer Counts April 2013 -Dec 2014.xlsx provides the customer counts for the test year April 2013 to March 2014 and each month up to date through December 2014.

Customer counts as utilized within rate cases are not taken at a single point in time. Instead, it is a count of all customers that billed during the month.

Case No. ER-2016-0285

Question:0237

Please provide for each month during the test year and each month following throughout the case, separately for Missouri and Kansas jurisdictions, a) the customer charge count and b) bill count in each customer class. For each month provided, specify whether the count applies to the beginning or the end of the month.

Response (10/12/2016):

Customer Counts (bill counts) and Customer Charge counts are provided in Marisol Miller's work papers of the direct filing for the test year. I have attached an abbreviated version to this request for quick reference. The counts are based on the bills that occur throughout the month specified.

It should be noted that Customer Counts (bill counts) will be available for the update and true-up periods, but customer charge counts are not available. Due to a change in process after the implementation of the UI Planner rate analysis tool, Customer Charge counts are only used during the test year period for the initial determination of revenues. For the update and true-up periods, Customer Counts (bill counts) are gathered, but Customer Charge counts are not included in any of the data gathering other than the detailed listing of LPS customers.

In the attached file, Customer counts are summarized at the bottom and include manual bills. Customer Charge counts are listed within each of the individual rates by month and totalized for the test year.

Case No. ER-2018-0145

Question:

For Kansas City Power and Light Company (KCPL) and Greater Missouri Operations Company (GMO), please provide for each month during the test year and each month following throughout the case, separately for Missouri and Kansas jurisdictions, a) the customer charge count and b) bill count in each customer class. For each month provided, specify whether the count applies to the beginning or the end of the month.

Response (4/2/2018):

KCPL-MO Customer Counts and Customer Charge Counts are provided in Marisol Miller's work papers of the direct filing for the test year. The Customer Counts are based on the active service agreements throughout the month specified.

Additionally, KCPL-MO Customer Counts and Customer Charge Counts are available for an additional four months (through October 2017) past the test year along with applicable revenues by rate code, as was mutually agreed with Staff prior to the filing of this rate case. While Customer Counts will be available for the regular update and true-up periods, Customer Charge Counts will not be available. Customer Charge Counts are only used during the test year period for the initial determination of revenues. For the update and true-up periods, Customer Counts are gathered, but Customer Charge Counts are not included in any of the data gathering other than the detailed listing of LPS customers. As mentioned, an exception was made to accommodate an agreement with Staff to provide an additional four months of full retail revenue data.

This additional data is included in the attached file with KCPL-MO Customer Counts and Customer Charge Counts listed within each of the individual rates by month and totalized for the year ending October 31, 2017.