

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Eighth Prudence)	
Review of Costs Subject to the)	
Commission-Approved Fuel)	Case No. EO-2019-0067
Adjustment Clause of KCP&L Greater)	
Missouri Operations Company)	

MOTION FOR LEAVE TO FILE SUPPLEMENTAL REBUTTAL

COMES NOW the Office of the Public Counsel (“OPC”) and for its *Motion for Leave to File Supplemental Rebuttal*, states as follows:

1. The OPC filed the Rebuttal Testimony of Lena M. Mantle (Public & Confidential) on June 6, 2019. This rebuttal testimony included a recommended adjustment of \$184,300 for Kansas City Power & Light Company (“KCPL”) related to renewable energy credits (“RECs”) that KCPL had allowed to expire.

2. Subsequent to the filing of Ms. Mantle’s rebuttal testimony, the Staff of the Commission (“Staff”) informed Ms. Mantle that one of the steps taken in calculating her recommended adjustment of \$184,300 was unnecessary based on information that the OPC had not previously been made aware of.

3. Based on this new information, the OPC has re-calculated its recommended adjustment.

4. The OPC has prepared and attached a two-page supplement to Ms. Mantle’s previous testimony that lays out in greater detail the reason for the previous

miscalculation as well as the now corrected calculation of its recommended adjustment.

5. This supplemental testimony concerns only a change in the numerical values presented in Ms. Mantle's prior testimony and does not constitute a change in the OPC's position as to any issue.

6. The OPC seeks leave from the Commission to file this supplemental rebuttal so as to correct the numerical values stated in the OPC's prior filed testimony.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission grant the OPC leave to file the *Supplemental Rebuttal Testimony of Lena M. Mantle* attached to this motion.

Respectfully submitted,
OFFICE OF THE PUBLIC
COUNSEL

By: /s/ John Clizer
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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this seventeenth day of July, 2019.

 /s/ John Clizer

Exhibit No.: _____
Issue(s): Correction of REC Adjustment
Witness/Type of Exhibit: Mantle/Rebuttal
Sponsoring Party: Public Counsel
Case No.: EO-2019-0067 (lead)
EO-2019-0068 (consolidated)
ER-2019-0199 (consolidated)

SUPPLEMENTAL REBUTTAL TESTIMONY

OF

LENA M. MANTLE

Submitted on Behalf of
The Office of the Public Counsel

KANSAS CITY POWER & LIGHT COMPANY

KCP&L GREATER MISSOURI OPERATIONS COMPANY

CASE NOS.:

EO-2019-0067 (lead)
EO-2019-0068 (consolidated)
ER-2019-0199 (consolidated)

July 17, 2019

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Eighth Prudence)
Review of Costs Subject to the) Case No. EO-2019-0067
Commission-Approved Fuel Adjustment) (Lead Case)
Clause of KCP&L Greater Missouri)
Operations Company)

In the Matter of the Second Prudence)
Review of Costs Subject to the) Case No. EO-2019-0068
Commission-Approved Fuel Adjustment) (Consolidated)
Clause of Kansas City Power and Light)
Company)

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company) Case No. ER-2019-0199
Containing its Semi-Annual Fuel) (Consolidated)
Adjustment Clause True-Up)

AFFIDAVIT OF LENA M. MANTLE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Lena Mantle, of lawful age and being first duly sworn, deposes and states:

1. My name is Lena M. Mantle. I am a Senior Analyst for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my supplemental rebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.




Lena M. Mantle
Senior Analyst

Subscribed and sworn to me this 17th day of July 2019.



JERENE A. BUCKMAN
My Commission Expires
August 23, 2021
Cole County
Commission #13754037



Jerene A. Buckman
Notary Public

My Commission expires August 23, 2017.

SUPPLEMENTAL REBUTTAL TESTIMONY

OF

LENA M. MANTLE

KCP&L GREATER MISSOURI OPERATIONS COMPANY

CASES NO. EO-2019-0067 and ER-2019-0199

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2019-0068

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

2 A. My name is Lena M. Mantle and my business address is P.O. Box 2230, Jefferson
3 City, Missouri 65102. I am a Senior Analyst for the Office of the Public Counsel
4 (“OPC”).

5 **Q. Are you the same Lena M. Mantle that provided rebuttal testimony in this**
6 **case?**

7 A. Yes, I am.

8 **Q. What is the purpose of this supplemental rebuttal testimony?**

9 A. The purpose of this supplemental rebuttal testimony is to change OPC’s
10 recommended adjustment for renewable energy credits (“RECs”) Kansas City
11 Power & Light Company allowed to expire from \$184,300 to \$325,969.

12 **Q. Why is OPC changing the adjustment amount?**

13 A. In my rebuttal testimony and the rebuttal testimony of OPC witness Dr. Geoff
14 Marke, OPC joined Staff in requesting the Commission find KCPL acted
15 imprudently when it chose not to sell the renewable energy credits (“RECs”)
16 provided through its wind PPAs. In my rebuttal testimony I recommended three
17 adjustments to Staff’s recommended imprudence amount of \$350,351. The first a
18 reduction of \$7,226, that KCPL witness Martin provided in his direct testimony,
19 for the fees that would have been incurred to sell the RECs. Secondly, because
20 Staff’s report claimed that this was the revenue that “KCPL” would have received,
21 I applied a jurisdictional allocation factor reducing the amount to \$194,000. Lastly,

1 because KCPL would have only passed 95% of the revenues through the FAC, I
2 reduced the prudence disallowance cost to \$184,300.

3 Subsequent to the filing of my rebuttal testimony, through a meeting with
4 Staff, I was informed that Staff's adjustment was for expired RECs that were
5 allocated to KCPL's Missouri jurisdiction upon the creation of the REC. Upon
6 review of workpapers provided after that meeting, I realized that the jurisdictional
7 allocation adjustment in my rebuttal testimony was not necessary. I am filing this
8 supplemental rebuttal not to change OPC's position regarding KCPL's decision to
9 let its excess RECs expire instead of selling them, but to correct my calculation of
10 the prudence adjustment amount.

11 **Q. Would you describe how OPC's new recommended prudence adjustment was**
12 **calculated?**

13 A. I started with Staff's recommended adjustment of \$350,351 and reduced it by
14 \$7,226 - the amount of the fees that would have been incurred to sell the RECs. I
15 then multiplied this reduced amount of \$343,125 by ninety-five percent resulting
16 in OPC's recommended prudence adjustment amount of \$325,969.

17 **Q. Is this the final prudence amount the Commission should order?**

18 A. No. Section 386.266.4(4) RSMo requires refunds of imprudently incurred costs to
19 include interest at KCPL's short-term interest rate. The amount recommended by
20 OPC does not include interest.

21 **Q. Does this conclude your supplemental rebuttal testimony?**

22 A. Yes, it does.