Exhibit No.:
Issue(s): *Retail Rate Revenue*
Witness: *Kim Cox*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Direct Testimony*
Case Nos.: *ER-2024-0189*
Date Testimony Prepared: *June 27, 2024*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGNDEPARTMENT

DIRECT TESTIMONY

OF

KIM COX

EVERGY MISSOURI WEST, INC.
d/b/a Evergy Missouri West

CASE NO. ER-2024-0189

Jefferson City, Missouri
June 2024

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KIM COX

EVERGY MISSOURI WEST, INC.

d/b/a Evergy Missouri West

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DIRECT TESTIMONY

OF

KIM COX

EVERGY MISSOURI WEST, INC.
d/b/a Evergy Missouri West

CASE NO. ER-2024-0189

Q. Please state your name and business address.

A. My name is Kim Cox, 200 Madison Street, Jefferson City, MO 65101.

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

A. I am employed by the Missouri Public Service Commission ("Commission") as a Senior Research/Data Analyst for the Tariff/Rate Design Department, in the Industry Analysis Division.

Q. Please describe your educational and work background.

A. Please see Schedule KC-d1.

EXECUTIVE SUMMARY

Q. What is the purpose of your direct testimony?

A. The purpose of my direct testimony is to provide the billed rate revenue adjustments for Evergy Missouri West ("EMW"), which are applied to the test year actual revenues experienced by EMW in the respective Staff accounting schedules. These adjustments are also applied to the test year billing determinants of EMW that underlie the Staff's fuel and production cost modeling, and will be the basis of Staff's recommended rate designs.

Q. Through this testimony, do you provide any recommendations that should be specifically reflected in the Commission's Report and Order in this case?

A. Yes, I recommend that the Commission Order reflect Staff's adjusted rate revenue as provided in my testimony and as updated in my true-up direct testimony along with the billing determinants which were used to calculate the adjusted rate revenue.

RATE REVENUES AND BILLING DETERMINANTS

Q. What are rate revenues?

A. Rate revenues are defined as the revenue a utility collects from its customers based on its Commission approved base rates. Base rates consist of a fixed monthly customer charge and variable rates that are dependent on usage (demand, energy, etc.) and the season (summer vs. winter). Rate revenues are the largest component of operating revenues.

Q. What are billing determinants?

A. Billing determinants are what a revenue requirement is divided by to produce rates. Billing determinants are the units of measurement for the combination of components to which rates are applied to calculate the customer's bill. Examples of billing determinant components are: customer charge, usage in kilowatt-hours ("kWh"), facilities demand in kilowatts ("kW"), non-coincident peak ("NCP") demand in kW, reactive demand in kilovolt-amperes reactive ("kVar"), net metering in kWh, and parallel generation in kWh.

Q. How does Staff use the billing determinants?

A. As an example, every month an EMW residential ("RES") customer is billed a fixed monthly customer charge and an energy charge based on the season[1] and the block[2] in which the usage occurred. For Staff to calculate the RES monthly rate revenue the monthly billing determinant components are multiplied by the applicable tariff rates.

[1] EMW summer season consist of the monthly billing periods of June through September. The winter season consist of the monthly billing periods of October through May.
[2] EMW residential general use energy charge is billed at the first 600 kWh, the next 400 kWh and over 1000 kWh.

Q. What are operating revenues?

A. Operating revenues are composed of three components: (1) Rate Revenue, (2) Other Operating Revenue, and (3) Off System Sales. This testimony will address rate revenues for EMW.

Q. What is the purpose of calculating operating revenues?

A. Operating revenues are the dollars a utility receives for selling energy at retail, selling energy at wholesale, leasing spaces on its poles, or other sources of revenue. Within the accounting schedules, operating revenues are used to test the adequacy of the currently effective retail electricity rates and the cost of service.

One of the major tasks in a rate case is to determine the magnitude of any deficiency (or excess) between cost of service and operating revenues. Once determined, the deficiency (or excess) can only be corrected (or otherwise addressed) by adjusting retail rates (i.e., rate revenue) prospectively.

Q. How did Staff determine the retail rate revenue for EMW rate classes?

A. Staff adjusted EMW jurisdictional billing units and rate revenues based upon information that is "known and measurable" as of the end of the update period. In this particular case, the test year is the twelve months ending June 30, 2023, updated for known and measurable changes through December 31, 2023. The two major categories of revenue adjustments are known as "normalization" and "annualization."

Q. What is normalization?

A. Normalization is adjustments to the company's billing determinants that account for unusual and unlikely events that would not be repeated in the years when the new rates from this case are in effect, e.g., events such as the update period weather.

Q. What are annualizations?

A. Annualizations are adjustments to the company's billing determinants to reflect known conditions at the end of the update period. Adjustments for customer growth are an example of an annualization.

Q. What rate classes did Staff normalize and annualize?

A Staff normalized and annualized billing determinants for the RES, small general service ("SGS"), and the large general service ("LGS") rate classes.[3]

Q. What rate revenue adjustments did Staff make to these classes?

A. Staff made the following adjustments; however, not all of these adjustments affect both sales and rate revenue dollars, and not all rate classes are subject to all adjustments.

a. update period adjustment,
b. rate switch adjustment,
c. weather normalization adjustment,
d. 365 days adjustment,
e. interclass residential rate switch adjustment,
f. Missouri Energy Efficiency Investment Act ("MEEIA") adjustment,
g. customer growth,
h. net metering and parallel rate change annualization, and
i. opt out adjustment for non-advanced metering infrastructure ("AMI") customers

a. Update Period Adjustment

Q. How did Staff calculate its update period adjustment?

A. Staff first calculated the test year revenue[4] based on EMW billing determinants provided in EMW's workpaper.[5] Staff requested and EMW provided the billing determinants[6] for July 1, 2022 through June 30, 2023. Staff then calculated the revenue for the 12 months

[3] Staff witness Marina Sever discusses the large power classes in her direct testimony.
[4] Twelve months ending June 30, 2023.
[5] CONFIDENTIAL – Billed Revenue – MO West – TYE202306.
[6] Data Request 144 requested the billing determinants including the number of customers served. The customer charge counts were provided however the customer bill counts (number of customers served) were not. The customer charge counts are needed to calculate test year and update period revenues.

ending December 31, 2023. The update period adjustment is the difference of billed usage and revenue through the twelve months ending December 31, 2023, compared to the billed usage and revenue through June 30, 2023.

b. Non-Residential Rate Switch Adjustment

Q. What non-residential rate switch adjustments did Staff make?

A. During the update period, one EMW customer switched from Large Power ("LP") to LGS. Staff added the customer, billing units and revenue from the LP rate class to the LGS rate class. The customer billing units and revenues were removed from the LP rate class.[7]

c. Weather Normalization Adjustment

Q. How did Staff calculate the weather normalization adjustment?

A. Staff witness Michael Stahlman provided the monthly weather normalization factor for the RES, SGS, and LGS rate classes.[8] Mr. Stahlman also provided the normalized peak, off peak and super off-peak percent of usage[9] for the Time Of Use ("TOU") residential rate codes.[10]

Staff applied the weather normalization factor to each rate code's monthly usage.[11] For example, if the weather normalized kWh factor is .97 for the month of September in the RES rate class, then the total actual usage for that month and for that rate class is decreased by 3%.

[7] Staff witness, Marina Stever provides testimony on the rate switch from LP.
[8] Staff was unable to calculate weather factors for each residential rate code without hourly data by rate code. Staff witness, Mr. Stahlman discusses this further in his direct testimony.
[9] Staff witness, Michael Stahlman discusses weather normalization factor and the TOU peak, off peak and super off-peak percent of usage in his direct testimony.
[10] TOU rate codes, MORPA, MORPAS, MORPANM, MORT, MORT2, and MORT3.
[11] Staff did not apply the weather factor for the rate codes that are billed a net metering or parallel generation credit.

Staff adjusted the total actual blocked billing determinants to equal the normalized monthly kWh using the relationship between actual average use per customer and normalized average usage per customer.[12] Staff also used the relationship between percentage of usage priced in the first rate block and the second rate block to distribute normalized monthly kWh to the rate blocks. For the TOU rate codes,[13] Staff then applied the normalized peak, off-peak and super off-peak percent of usage[14] to the total weather normalized kWh. These calculations resulted in normalized usage by rate block, and normalized peaks (when applicable) which was then converted to total normalized revenues by multiplying rate block and peak usage by the appropriate rates.

Q. Did Staff encounter any issues when calculating the normalized average usage per customer?

A. Yes. Based on EMW's definitions of customer bill counts and customer charge counts provided in ER-2016-0156,[15] Staff has used the customer bill counts to calculate the normal average use per customer for rate cases since approximately 2016. Staff asked Data Request ("DR") No. 144, 146, 146.1, and 350, sent emails, and had two phone calls with EMW to obtain the customer bill counts.

Q. Has EMW provided the customer bill/counts and customer charge counts in previous rate cases?

[12] Staff had to use customer charge counts to calculate the normalized use per customer in this case due to customer bill counts not being provided for the update period.
[13] TOU rate codes, MORPA, MORPAS, MORPANM, MORT, MORT2, and MORT3
[14] Provided by Michael Stahlman.
[15] ER-2016-0156, DR No. 112 response, Customer Bill/Count is based on the number of unique service agreements in CIS - which is a customer count when looking at monthly data and a bill count when looking at the annual total - thus the "combination" naming. The Customer Charge count (or units) is based on how many customer charges are for that month. An example: if a customer received a regular bill and then also a final bill for a particular month, there would be two customer charges but they would still only be counted as one customer.

A. Yes.

Q. Staff submitted DR No. 144 asking for the number of customers served on the last day of each month for each rate code for the twelve months ending June 30, 2023, and on a monthly basis following thereafter as it became available. Did EMW provide the number of customers served in the DR response?

A. No. After Staff reviewed EMW's direct filed workpapers, Staff discovered the test year bill counts in a workpaper.[16] During an April 11, 2024, phone call with EMW personnel, Staff asked again for the number of customers served for the update period and was advised by EMW witness Ms. Marisol Miller, to ask a different EMW witness, Mr. Al Bass, who was not on the call. Staff set up another phone call with EMW on April 16, 2024, and was advised by Mr. Bass to talk to Ms. Miller. Staff attempted to work with EMW to obtain the data and unfortunately was not successful. At this point, Staff discussed the matter with the Industry Analysis Director, Jim Busch. Mr. Busch spoke with EMW personnel. Based on conversations, workpapers, and DR responses, it is unclear if the data is available after the test year.

Q. Can you please provide the customer bill counts and customer charge counts found in Ms. Miller's workpaper?

A. Yes, below are Ms. Miller's reported test year residential customer bill counts and customer charge counts.

[16] Company witness, Al Bass workpaper, Actuals by Rate Code – kWh and CC – MO West TYE 20230630 – Bill and Cust Charge Count

	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23
Customer/Bill Count	292,712	293,174	293,794	294,275	294,411	295,441	296,549	297,029	296,875	296,470	296,186	293,161
Customer Charge/ Other Meter	292,712	293,174	293,794	294,275	294,411	295,441	296,549	297,029	296,875	296,470	296,186	293,161

Q. Can you please provide the customer bill counts and customer charge counts found in Mr. Bass' workpaper?

A. Yes, below are Mr. Bass' reported test year residential customer bill counts and customer charge counts.

	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23
Customer/Bill Count												
Residential	290,798	291,113	291,802	292,427	292,895	293,832	294,730	295,024	294,721	294,428	294,321	293,655
Customer Charge Count												
Residential	292,712	293,174	293,794	294,275	294,411	295,441	296,549	297,029	296,875	296,470	296,186	293,161
Delta	1,914	2,061	1,992	1,848	1,516	1,609	1,819	2,005	2,154	2,042	1,865	(494)

Q. How is it possible that Ms. Miller's bill counts and customer charge counts are the same?

A. Staff had the same question and asked DR 146 and DR 146.1.

DR No. 146 asked:

> Please explain how the monthly customer/bill count is the same as the customer charge count. Please define each term as it is used in the workpaper CONFIDENTIAL – Billed Revenue – MO West – TYE202306. Is the number the monthly customer/bill count or the customer charge?

EMW DR No. 146 response:

> To align with the customer count methodology promoted by Staff in recent rate cases, Evergy defined customer/bill count as the number of customer charge determinants. Therefore, customer/bill count shares that same definition as customer charge count. There are exceptions to this customer/bill count definition for rates that do not have associated customer charges.

Staff DR No. 146.1 asked:

> Case number ER-2016-0156 DR 112, Staff asked: "Please explain the difference in the number of customers under Customer/Bill Count and the number of customers under Customer Charge listed in GMO workpaper labeled "UI BF and WN_GMO_Al." Evergy response: "Customer Bill/Count is based on the number of unique service agreements in CIS – which is a customer count when looking at monthly data and a bill count when looking at the annual total - thus the "combination" naming. The Customer Charge count (or units) is based on how many customer charges are for that month. An example: if a customer received a regular bill and then also a final bill for a particular month, there would be two customer charges but they would still only be counted as one customer." Please explain what has changed since Evergy's response. In ER-2022-0129 & 0130, Staff utilized customer bill count as defined in ER-2016-0156 DR 112 to calculate UPC and NUPC. Please explain Evergy's understanding of Staff's methodology in its statement, "To align with the customer count methodology promoted by Staff in recent rate cases, Evergy defined customer/bill count as the number of customer charge determinants." Workpaper, Actuals by Rate Code – kWh and CC – MO West TYE 20230630, provides customer/bill count and customer charge count. Please explain why they are different if the definitions are the same.

EMW DR No. 146.1 response:

> Since Evergy's response stated above, Evergy has defined customer/bill count as the number of customer charge determinants.
>
> Staff utilized customer charge determinants in the prior rate case when calculating customer growth factors. Evergy has aligned with Staff's methodology by defining customer count as the number of customer charge determinants.
>
> Evergy includes both customer/bill count and customer charge count because the company has some rates that do not have customer charges associated with them.

Q. Did Staff's methodology include the customer charge counts for calculating normalized use per customer in previous rate cases?

A. No. Staff has used customer bill counts based on EMW's definitions. If EMW was to align with Staff's methodology, then EMW would have utilized the customer bill counts

to calculate normalized use per customer and would have utilized the customer charge counts to calculate customer growth.

Q. Does Staff know what the differences are in Mr. Bass' bill counts and Ms. Miller's customer charge counts?

A. No. Due to these differences, Staff issued DR No. 350, asking:

> 1. Do the customer charge counts in workpaper, CONFIDENTIAL - Billed Revenue - MOP West - TYE202306 include partials, finals, and bill corrections?
>
> 2. Do the bill counts in workpaper, Actuals by Rate Code - kWh and CC - MO West TYE 20230630 - Bill and Cust Charge count include partials, finals, and bill corrections?

EMW DR No. 350 response:

> 1. Customer charge counts are based on the customer charges charged. If a customer was billed a partial bill and a final bill and or corrections that would be reflected in that count.
>
> 2. See #1.

Q. Based on the information EMW has indicated is available in this case, can any party perform weather normalization adjustment with the level of certainty typically experienced in a major electric utility rate case?

A. No. Setting aside residential rate switching concerns, discussed separately, and concerns with the reasonableness of utilizing a single residential load for calculating the weather response of customers on various rate plans,[17] Staff ultimately had to use the data EMW did provide, which was the customer charge counts for its analysis. Staff did the best with what EMW provided.

[17] Discussed by Staff witness Michael Stahlman in his direct testimony.

d. 365 Days Adjustment

Q. How did Staff calculate the 365 days adjustment?

A. Staff witness Michael Stahlman provided the monthly 365 day factor for each rate class. Staff applied the 365 day factor the same as the weather normalization factor.

e. Residential Interclass Rate Switch Adjustment

Q. How did Staff calculate the interclass residential rate switch adjustment?

A. After adjusting for the update period, rate switching, weather normalization, and 365 days adjustment by rate code, Staff switched all residential rate codes to the applicable[18] TOU rate codes. The chart below provides the switch by rate code.

Rate Code	Rate codes switched
MORPA:	MORG, MORH, MORO, MORT, MORT2, and MORT3
MORPAS:	MORGS, MORHS, and MORPAS
MORPANM:	MORNO, MORN, and MORNH

Q. Why did Staff make the interclass residential rate switch adjustment?

A. As of December 31, 2023, the rates listed in "rate codes switched" were no longer available.[19] The high differential time of use (MORT3) and the two-period time of use (MORT2) became available October 2023 and therefore did not have billing determinants for each month of the update period. In addition, the time of use tariff states:

> Contracts under this schedule shall be for a period of not less than one year from the effective date thereof, however, customers may switch their residential service to a different residential rate subject to the terms of use and provisions of those rates.

[18] The rate codes with net metering and solar access/block charge were moved to the TOU rate codes with the same designation.
[19] With the exception of MORT, MORT2, MORT3, and MORG (opt out AMI meters).

Q. Is Staff certain of EMW's residential customers and the usage of each rate code calculated in the interclass switch adjustment?

A. No. Again, Staff did the best it could with the test year and update period ordered in this case and the data provided by EMW. Without having a full twelve months of billing determinants for the new rate codes, Staff concluded that the customers should be moved to the default rate.

Q. If EMW provided Staff the RES monthly billing determinants by rate code, would Staff be able to adjust its direct position for the interclass switching?

A. No. The true-up data would still not incorporate a full twelve months of customers on the new rate code nor would there be an adequate amount of time for the analysis. Below provides the two period time of use (MORT 2) billing determinants through the update period:

	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23
Customer /Bill Count	-	1	1	3	3	5	128	855	6,519	18,391	26,944	26,922
Customer Charge	-	1	1	3	3	5	128	855	6,519	18,391	26,944	26,922
Summer kWh												
On-peak	-	-	-	-	-	518	29,503	204,838	1,180,831	1,675,041	35,484	-
Off-Peak	-	-	-	-	-	2,383	145,165	988,777	6,039,719	8,050,855	251,109	-
Off-peak	-	1,495	1,214	1,104	1,351	2,673	158	-	-	3,058,756	13,271,263	18,382,375
Super-off peak	-	467	367	316	327	567	34	-	-	728,820	3,617,697	5,395,414
Total kWh		1,962	1,581	1,420	1,678	6,142	174,860	1,193,616	7,220,550	13,513,472	17,175,553	23,777,789

If EMW was to provide January 2024 through June 2024, the issue would still exist. Staff witness Sarah Lange discusses the switching of rates codes further in her direct testimony.

f. MEEIA Adjustment

Q. How did Staff apply the MEEIA adjustment?

A. Staff witness Hari Poudel provided the monthly kWh MEEIA adjustment by class. For the residential class, Staff calculated the monthly percent of kWh in each rate code and then applied the adjustment to the second block. For the SGS and LGS class, Staff calculated the MEEIA factor and applied it the same as the weather normalization factor.

g. Customer Growth Adjustment

Q. What customer growth adjustment did Staff make?

A. Staff made a customer growth adjustment to reflect the impact in change of customer levels on the update period kWh sales, kW demand and rate revenue. For the residential class, Staff took the average customer charge counts of November 2023 and December 2023 to calculate the growth factor that was then applied to billing determinants. For the SGS and LGS rate classes, Staff calculated the growth factor by applying December 2023. The adjustment reflects the level of kWh sales, kW demand and rate revenue that would have occurred if the customers existed throughout the entire 12 months ending December 31, 2023.

Q. Is this adjustment subject to the same uncertainty described above with regard to accurate customer counts?

A. Yes. It is not clear how many customers EMW served or how many customer charges EMW issued in any given month (or as of any given day) during the test year or update period.

Q. Will this complicate true-up?

A. Yes. For true-up direct, Staff analyzes the customer charge counts through the true-up period and adjust accordingly. The uncertainty of customer charges will still exist at

true-up direct and there still will not be a full twelve months of billing determinants on the new rate codes.

h. Net Metering and Parallel Generation Rate Change Annualization

Q. How did Staff annualize the net metering and parallel generation rate change?

A. A net metering and parallel generation rate change occurred June 12, 2023. Staff applied the new rate for the months of July 2023 through December 2023.

i. Opt Out Adjustment Non-AMI Customers

Q. What opt out adjustment did Staff make for non-AMI customers?

A. DR 366 stated there was an average of 33 non-AMI residential customers per month. Staff moved those customers from MORPA rate code to MORG rate code and applied the applicable tariffed rates.

Q. Once Staff completed its analysis of the rate revenue adjustments as discussed above, what did Staff do with its results?

A. Staff provided the normalized and annualized usage to Staff witness Michael Stahlman for inclusion in his calculation of Net System Input ("NSI"), to Staff witness Alan Bax, and to Staff witness Broderick Niemeier for inclusion of their determination of jurisdictional allocations. These witnesses provide more detail in their direct testimony. Staff also provided each revenue adjustment discussed above to Staff witness Matthew Young to include in the overall revenue requirement.

CONCLUSION

Q. What are your recommended rate revenue adjustments?

A. The Commission should base its awarded revenue requirement and billing determinants on Staff's rate revenue adjustments and billing determinants as attached and as updated in true up direct.[20]

Q. Does this conclude your direct testimony?

A. Yes, it does.

[20] Staff will update growth to reflect the most current customer charge counts.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement A General Rate Increase for Electric Service	))))	Case No. ER-2024-0189

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 *Direct 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

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 21st day of June 2024.

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

D Suzie Mankin

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
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

	Company	Issue	Type of Filing
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
EO-2024-0002	Evergy Metro, Inc. d/b/a Evergy Missouri Metro & Evergy Missouri West, Inc. d/b/a Evergy Missouri West	Request for Customer Account Data	Rebuttal testimony

RESIDENTIAL	Current Rates	Billing Determinants	Current Revenue
A. CUSTOMER CHARGE			
One Meter - MORG (Opt out)	$ 45.00	391	$ 17,595
One Meter - TOU (RPKA)	$ 12.00	3,620,197	$ 43,442,360
B. ENERGY CHARGE			
Summer Rate			
Summer Gen - (MORG)			
0-600	$ 0.11577	70,355	$ 8,145
600-1000	$ 0.11577	35,088	$ 4,062
1000+	$ 0.12623	43,756	$ 5,523
Winter Rates			
Winter Gen - (MORG)			
0-600	$ 0.10465	104,374	$ 10,923
600-1000	$ 0.08255	30,182	$ 2,492
1000+	$ 0.08255	30,880	$ 2,549
TOU (MORPA, MORPAS, MORPAPG, & MORPANM)			
Summer Rate			
Summer			
0-600	$ 0.11829	660,710,825	$ 78,155,484
600-1000	$ 0.11829	325,269,568	$ 38,476,137
1000+	$ 0.12829	436,892,078	$ 56,048,885
Winter Rate			
Winter			
0-600	$ 0.09784	1,206,921,735	$ 118,085,223
600-1000	$ 0.07718	431,578,172	$ 33,309,203
1000+	$ 0.07718	667,328,942	$ 51,504,448
C. Peak Adjustment			
Summer			
On-peak (4pm-8pm)	$ 0.01000	351,634,143	$ 3,516,341
Super off-peak (12am-6am)	$ (0.01000)	242,369,675	$ (2,423,697)
Winter			
On-peak (4pm-8pm)	$ 0.00250	431,752,099	$ 1,079,380
Super off-peak (12am-6am)	$ (0.01000)	507,545,198	$ (5,075,452)
Service Access Charge	$ 0.08840	1,663,502	$ 147,054
Solar Block Charge	$ 0.04000	1,663,502	$ 66,540
Net metering	$ 0.023	(7,864,428)	$ (183,241)
Total Revenue		3,729,015,956	$ 416,199,954

SMALL GENERAL SERVICE					
A: CUSTOMER CHARGE					
SUMMER/WINTER					
Non-demand service (MOSGS, MOSGSS, MOSNS & MOSUS)	$	23.97	307,433	$	7,369,174
Temporary non-demand service (MOSHS) Fozen	$	9.77	18	$	171
Secondary service with demand (MOSDS, MOSDSW & MOSND)	$	23.97	148,646	$	3,563,054
Primary service with demand (MOSGP)	$	23.97	438	$	10,508
B: FACILITIES CHARGE					
Per kW of Facilities Deamand All kW (MOSDS, MOSDSW, & MOSND)	$	1.448	7,314,161	$	10,590,905
MOSGP	$	1.448	33,527	$	48,547
C: DEMAND CHARGE					
SECONDARY-SUMMER: (MOSDS, MOSDSW, & MOSND)					
Billing Demand	$	1.271	1,994,943	$	2,535,572
SECONDARY-WINTER: (MOSDS, MOSDSW, & MOSND)					
Base Billing Demand	$	1.242	3,626,996	$	4,504,729
PRIMARY-SUMMER: (MOSGP)					
Billing Demand	$	1.233	9,065	$	11,177
PRIMARY-WINTER: (MOSGP)					
Base Billing Demand	$	1.205	15,968	$	19,241
Seasonal Billing Demand					
D: ENERGY CHARGE					
NON-DEMAND SUMMER: (MOSGS, MOSGSS, MOSNS SUS)					
Energy Charge	$	0.13902	70,339,988	$	9,778,665
NON-DEMAND WINTER: (MOSGS, MOSGSS, MOSNS & SUS)					
Base Energy	$	0.08734	110,517,477	$	9,652,596
Seasonal Energy	$	0.04480	21,215,372	$	950,449
TEMPORARY NON-DEMAND SUMMER: (MOSHS)					
Energy Charge	$	0.13902	-	$	-
TEMPORARY NON-DEMAND WINTER: (MOSHS)					
Energy Charge	$	0.06504	41,228	$	2,681
Seasonal Energy	$	0.04480	32,170	$	1,441

Continued				
SMALL GENERAL SERVICE				
SECONDARY-SUMMER: (MOSDS, MOSDSW & MOSND)				
Energy				
0-180 hrs use per month	$	0.09747	256,917,628	$ 25,041,761
181-360 hrs use per month	$	0.07334	168,447,273	$ 12,353,923
361+ hrs use per month	$	0.07334	9,796,013	$ 718,440
SECONDARY-WINTER: (MOSDS, MOSDSW & MOSND)				
Base Energy				
0-180 hrs use per month	$	0.07080	418,833,861	$ 29,653,437
181-360 hrs use per month	$	0.06390	228,645,567	$ 14,610,452
361+ hrs use per month	$	0.06390	33,188,461	$ 2,120,743
Seasonal Energy				
0-180 hrs use per month	$	0.04480	56,245,368	$ 2,519,792
181-360 hrs use per month	$	0.04480		$ -
361+ hrs use per month	$	0.04480		$ -
PRIMARY-SUMMER: (MOSGP)				
Energy				
0-180 hrs use per month	$	0.09144	371,224	$ 33,945
181-360 hrs use per month	$	0.06880	1,032,963	$ 71,068
361+ hrs use per month	$	0.06880	920,846	$ 63,354
PRIMARY-WINTER: (MOSGP)				
Base Energy				
0-180 hrs use per month	$	0.06953	1,047,386	$ 72,825
181-360 hrs use per month	$	0.06276	1,585,018	$ 99,476
361+ hrs use per month	$	0.06276	1,283,634	$ 80,561
Seasonal Energy				
0-180 hrs use per month	$	0.04305	559,497	$ 24,086
181-360 hrs use per month	$	0.04305		
361+ hrs use per month	$	0.04305		
Facilities Line Charge				$ 282
Net Metering (SNS & SND)	$	0.023	(2,406,505)	$ (56,072)
Parallel Generation (SDS)	$	0.023	(305,916)	$ (7,128)
Solar Block Charge	$	0.0884	87,736	$ 7,756
Solar Access Charge	$	0.0400	87,736	$ 3,509
Customer Rev Share				$ (6,678)
Rollover Credit Available				$ -
Primary Discount (SGP)	$	(1.00)	7,182	$ (7,182)
Total Revenue			1,381,020,972	$ 136,437,264

LARGE GENERAL SERVICE				
A: CUSTOMER CHARGE				
SUMMER/WINTER				
Secondary Service (MOLGS, MOLNS & LGSW)	$	74.84	15,582	$ 1,166,157
Primary Service (LGP & LGPW)	$	246.21	408	$ 100,454
(MOLNP)	$	246.21	24	$ 5,909
B. FACILITIES CHARGE				
Per kW of Facilities Demand All kW (MOLGS, MOLNS &	$	2.290	4,334,037	$ 9,924,945
MOLGP, MOLGPW, & MOLNP	$	1.483	469,719	$ 696,594
C: DEMAND CHARGE				
SECONDARY-SUMMER: (MOLGS, MOLNS & LGSW)				
Billing Demand	$	0.906	1,228,688	$ 1,113,191
SECONDARY-WINTER: (MOLGS, MOLNS & LGSW)				
Base Billing Demand	$	0.611	2,266,180	$ 1,384,636
PRIMARY-SUMMER: (MOLGP, MOLGPW, & MOLNP)				
Billing Demand	$	0.878	104,094	$ 91,395
PRIMARY-WINTER: (MOLGP, MOLGPW & MOLNP)				
Base Billing Demand	$	0.592	184,167	$ 109,027
D: ENERGY CHARGE				
SECONDARY-SUMMER: (MOLGS, MOLNS & LGSW)				
Energy Charge				
0-180 hrs use per month	$	0.08973	198,114,832	$ 17,776,844
181-360 hrs use per month	$	0.06790	157,826,152	$ 10,716,396
361+ hrs use per month	$	0.04751	65,420,944	$ 3,108,149
SECONDARY-WINTER: (MOLGS, MOLNS & LGSW)				
Base Energy				
0-180 hrs use per month	$	0.06836	339,980,230	$ 23,241,049
181-360 hrs use per month	$	0.06266	257,563,878	$ 16,138,953
361+ hrs use per month	$	0.04291	90,878,745	$ 3,899,607
Seasonal Energy	$	0.03753	23,489,127	$ 881,547
PRIMARY-SUMMER: (MOLGP, MOLGPW, & MOLNP)				
Energy Charge				
0-180 hrs use per month	$	0.08701	18,141,138	$ 1,578,460
181-360 hrs use per month	$	0.06584	14,994,314	$ 987,226
361+ hrs use per month	$	0.04606	6,133,088	$ 282,490

Continued					
LARGE GENERAL SERVICE					
PRIMARY-WINTER: (MOLGP, MOLGPW & MOLNP)					
Base Energy					
0-180 hrs use per month	$	0.06588	29,684,254	$	1,955,599
181-360 hrs use per month	$	0.06038	25,436,584	$	1,535,861
361+ hrs use per month	$	0.04132	8,581,021	$	354,568
Seasonal Energy	$	0.03659	7,635,611	$	279,387
Net Metering Credit	$	0.023	(71,241)	$	(1,660)
Parallel Generation	$	0.023	(104,103)	$	66,288
	$	4.50			
Primary Discount	$	(1.00)	388,002	$	(388,002)
Customer Rev Share				$	(136,814)
Rollover Credit Available					
Reduced Commitment Surcharge				$	-
EDR Adjustment				$	(1,179,715)
Facilities Line Extension (LGS)				$	3,150
Total Revenue			1,243,879,920	$	95,691,688

ELECTRIC VEHICLE				
A: CUSTOMER CHARGE				
MOBEV	$	74.84	12	$ 861
MOETS	$	75.32	12	$ 904
CCN			2,746	
B: FACILITIES				
MOBEV	$	2.290	490	$ 1,122
MOETS	$	2.305	2,997	$ 6,909
C: ENERGY CHARGE				
MOBEV - Summer				
On Peak	$	0.22572	51	$ 12
Off Peak	$	0.06584	189	$ 12
Super Off-Peak	$	0.03762	36	$ 1
MOBEV - Winter				
On Peak	$	0.11301	1,551	$ 175
Off Peak	$	0.06179	3,822	$ 236
Super Off-Peak	$	0.03762	263	$ 10
MOETS -Summer				
On Peak	$	0.15232	38,942	$ 5,932
Off Peak	$	0.04821	59,016	$ 2,845
MOETS - Winter				
On Peak	$	0.11136	68,160	$ 7,590
Off Peak	$	0.04354	92,742	$ 4,038
CCN				
Level 2	$	0.21126	242,133	$ 51,153
Level 3	$	0.26408	45,208	$ 11,939
Total Revenue			552,114	$ 93,738