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Kim Cox
Direct
File No. ER-2024-0189

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Witness: Kim Cox
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MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

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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DIRECT TESTIMONY OF
KIM COX
EVERGY MISSOURI WEST, INC.
d/b/a Evergy Missouri West
CASE NO. ER-2024-0189**

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

4 **RATE REVENUES AND BILLING DETERMINANTS**

5 Q. What are rate revenues?

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

10 Q. What are billing determinants?

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

17 Q. How does Staff use the billing determinants?

18 A. As an example, every month an EMW residential (“RES”) customer is billed a
19 fixed monthly customer charge and an energy charge based on the season¹ and the block² in
20 which the usage occurred. For Staff to calculate the RES monthly rate revenue the monthly
21 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.

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1 Q. What are operating revenues?

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

5 Q. What is the purpose of calculating operating revenues?

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

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

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

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

20 Q. What is normalization?

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

1 Q. What are annualizations?

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

5 Q. What rate classes did Staff normalize and annualize?

6 A. Staff normalized and annualized billing determinants for the RES, small general
7 service (“SGS”), and the large general service (“LGS”) rate classes.³

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

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

- 11 a. update period adjustment,
- 12 b. rate switch adjustment,
- 13 c. weather normalization adjustment,
- 14 d. 365 days adjustment,
- 15 e. interclass residential rate switch adjustment,
- 16 f. Missouri Energy Efficiency Investment Act (“MEEIA”) adjustment,
- 17 g. customer growth,
- 18 h. net metering and parallel rate change annualization, and
- 19 i. opt out adjustment for non-advanced metering infrastructure (“AMI”) customers

20 **a. Update Period Adjustment**

21 Q. How did Staff calculate its update period adjustment?

22 A. Staff first calculated the test year revenue⁴ based on EMW billing determinants
23 provided in EMW’s workpaper.⁵ Staff requested and EMW provided the billing determinants⁶
24 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.

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

4 **b. Non-Residential Rate Switch Adjustment**

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

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

10 **c. Weather Normalization Adjustment**

11 Q. How did Staff calculate the weather normalization adjustment?

12 A. Staff witness Michael Stahlman provided the monthly weather normalization
13 factor for the RES, SGS, and LGS rate classes.⁸ Mr. Stahlman also provided the normalized
14 peak, off peak and super off-peak percent of usage⁹ for the Time Of Use (“TOU”) residential
15 rate codes.¹⁰

16 Staff applied the weather normalization factor to each rate code’s monthly usage.¹¹ For
17 example, if the weather normalized kWh factor is .97 for the month of September in the RES
18 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.

1 Staff adjusted the total actual blocked billing determinants to equal the normalized
2 monthly kWh using the relationship between actual average use per customer and normalized
3 average usage per customer.¹² Staff also used the relationship between percentage of usage
4 priced in the first rate block and the second rate block to distribute normalized monthly kWh to
5 the rate blocks. For the TOU rate codes,¹³ Staff then applied the normalized peak, off-peak and
6 super off-peak percent of usage¹⁴ to the total weather normalized kWh. These calculations
7 resulted in normalized usage by rate block, and normalized peaks (when applicable) which was
8 then converted to total normalized revenues by multiplying rate block and peak usage by the
9 appropriate rates.

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

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

17 Q. Has EMW provided the customer bill/counts and customer charge counts in
18 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.

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1 A. Yes.

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

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

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

18 A. Yes, below are Ms. Miller's reported test year residential customer bill counts
19 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

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| | 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.

1 Staff DR No. 146.1 asked:

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

23 EMW DR No. 146.1 response:

24 Since Evergy’s response stated above, Evergy has defined customer/bill
25 count as the number of customer charge determinants.

26 Staff utilized customer charge determinants in the prior rate case when
27 calculating customer growth factors. Evergy has aligned with Staff’s
28 methodology by defining customer count as the number of customer
29 charge determinants.

30 Evergy includes both customer/bill count and customer charge count
31 because the company has some rates that do not have customer charges
32 associated with them.

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

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

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

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

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

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

12 EMW DR No. 350 response:

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

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

20 A. No. Setting aside residential rate switching concerns, discussed separately, and
21 concerns with the reasonableness of utilizing a single residential load for calculating the
22 weather response of customers on various rate plans,¹⁷ Staff ultimately had to use the data EMW
23 did provide, which was the customer charge counts for its analysis. Staff did the best with what
24 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 applicable¹⁸ 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).

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

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

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

9 A. No. The true-up data would still not incorporate a full twelve months of
10 customers on the new rate code nor would there be an adequate amount of time for the analysis.

11 Below provides the two period time of use (MORT 2) billing determinants through the update
12 period:

13

| | 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 |

14 If EMW was to provide January 2024 through June 2024, the issue would still exist.
15 Staff witness Sarah Lange discusses the switching of rates codes further in her direct testimony.
16

1 **f. MEEIA Adjustment**

2 Q. How did Staff apply the MEEIA adjustment?

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

7 **g. Customer Growth Adjustment**

8 Q. What customer growth adjustment did Staff make?

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

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

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

21 Q. Will this complicate true-up?

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

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

3 **h. Net Metering and Parallel Generation Rate Change Annualization**

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

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

7 **i. Opt Out Adjustment Non-AMI Customers**

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

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

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

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

1 **CONCLUSION**

2 Q. What are your recommended rate revenue adjustments?

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

6 Q. Does this conclude your direct testimony?

7 A. Yes, it does.

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

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.

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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 | | | |
| <u>Summer Gen - (MORG)</u> | | | |
| 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 | | | |
| <u>Winter Gen - (MORG)</u> | | | |
| 0-600 | \$ 0.10465 | 104,374 | \$ 10,923 |
| 600-1000 | \$ 0.08255 | 30,182 | \$ 2,492 |
| 1000+ | \$ 0.08255 | 30,880 | \$ 2,549 |
| <u>TOU (MORPA, MORPAS, MORPAPG, & MORPANM)</u> | | | |
| Summer Rate | | | |
| <u>Summer</u> | | | |
| 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 | | | |
| <u>Winter</u> | | | |
| 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 | | | |
| <u>Summer</u> | | | |
| 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) |
| <u>Winter</u> | | | |
| 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 | | | |
| <u>SUMMER/WINTER</u> | | | |
| 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 | | | |
| <u>SECONDARY-SUMMER: (MOSDS, MOSDSW, & MOSND)</u> | | | |
| Billing Demand | \$ 1.271 | 1,994,943 | \$ 2,535,572 |
| <u>SECONDARY-WINTER: (MOSDS, MOSDSW, & MOSND)</u> | | | |
| Base Billing Demand | \$ 1.242 | 3,626,996 | \$ 4,504,729 |
| <u>PRIMARY-SUMMER: (MOSGP)</u> | | | |
| Billing Demand | \$ 1.233 | 9,065 | \$ 11,177 |
| <u>PRIMARY-WINTER: (MOSGP)</u> | | | |
| Base Billing Demand | \$ 1.205 | 15,968 | \$ 19,241 |
| Seasonal Billing Demand | | | |
| D: ENERGY CHARGE | | | |
| <u>NON-DEMAND SUMMER: (MOSGS, MOSGSS, MOSNS SUS)</u> | | | |
| Energy Charge | \$ 0.13902 | 70,339,988 | \$ 9,778,665 |
| <u>NON-DEMAND WINTER: (MOSGS, MOSGSS, MOSNS & SUS)</u> | | | |
| Base Energy | \$ 0.08734 | 110,517,477 | \$ 9,652,596 |
| Seasonal Energy | \$ 0.04480 | 21,215,372 | \$ 950,449 |
| <u>TEMPORARY NON-DEMAND SUMMER: (MOSHS)</u> | | | |
| Energy Charge | \$ 0.13902 | - | \$ - |
| <u>TEMPORARY NON-DEMAND WINTER: (MOSHS)</u> | | | |
| Energy Charge | \$ 0.06504 | 41,228 | \$ 2,681 |
| Seasonal Energy | \$ 0.04480 | 32,170 | \$ 1,441 |

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| Continued | | | |
| SMALL GENERAL SERVICE | | | |
| <u>SECONDARY-SUMMER: (MOSDS, MOSDSW & MOSND)</u> | | | |
| 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 |
| <u>SECONDARY-WINTER: (MOSDS, MOSDSW & MOSND)</u> | | | |
| 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 | | \$ - |
| | | | |
| <u>PRIMARY-SUMMER: (MOSGP)</u> | | | |
| 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 |
| <u>PRIMARY-WINTER: (MOSGP)</u> | | | |
| 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 | | |
| | | | |
| <u>Facilities Line Charge</u> | | | \$ 282 |
| | | | |
| <u>Net Metering (SNS & SND)</u> | \$ 0.023 | (2,406,505) | \$ (56,072) |
| <u>Parallel Generation (SDS)</u> | \$ 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 | | | \$ - |
| <u>Primary Discount (SGP)</u> | \$ (1.00) | 7,182 | \$ (7,182) |
| Total Revenue | | 1,381,020,972 | \$ 136,437,264 |
| | | | |
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| LARGE GENERAL SERVICE | | | |
|--|------------|-------------|---------------|
| A: CUSTOMER CHARGE | | | |
| <u>SUMMER/WINTER</u> | | | |
| 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 & LGSW) | \$ 2.290 | 4,334,037 | \$ 9,924,945 |
| MOLGP, MOLGPW, & MOLNP | \$ 1.483 | 469,719 | \$ 696,594 |
| C: DEMAND CHARGE | | | |
| <u>SECONDARY-SUMMER: (MOLGS, MOLNS & LGSW)</u> | | | |
| Billing Demand | \$ 0.906 | 1,228,688 | \$ 1,113,191 |
| <u>SECONDARY-WINTER: (MOLGS, MOLNS & LGSW)</u> | | | |
| Base Billing Demand | \$ 0.611 | 2,266,180 | \$ 1,384,636 |
| <u>PRIMARY-SUMMER: (MOLGP, MOLGPW, & MOLNP)</u> | | | |
| Billing Demand | \$ 0.878 | 104,094 | \$ 91,395 |
| <u>PRIMARY-WINTER: (MOLGP, MOLGPW & MOLNP)</u> | | | |
| Base Billing Demand | \$ 0.592 | 184,167 | \$ 109,027 |
| D: ENERGY CHARGE | | | |
| <u>SECONDARY-SUMMER: (MOLGS, MOLNS & LGSW)</u> | | | |
| 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 |
| <u>SECONDARY-WINTER: (MOLGS, MOLNS & LGSW)</u> | | | |
| 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 |
| <u>PRIMARY-SUMMER: (MOLGP, MOLGPW, & MOLNP)</u> | | | |
| 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 |

| 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 | | | |
| <u>MOBEV - Summer</u> | | | |
| On Peak | \$ 0.22572 | 51 | \$ 12 |
| Off Peak | \$ 0.06584 | 189 | \$ 12 |
| Super Off-Peak | \$ 0.03762 | 36 | \$ 1 |
| <u>MOBEV - Winter</u> | | | |
| On Peak | \$ 0.11301 | 1,551 | \$ 175 |
| Off Peak | \$ 0.06179 | 3,822 | \$ 236 |
| Super Off-Peak | \$ 0.03762 | 263 | \$ 10 |
| <u>MOETS - Summer</u> | | | |
| On Peak | \$ 0.15232 | 38,942 | \$ 5,932 |
| Off Peak | \$ 0.04821 | 59,016 | \$ 2,845 |
| <u>MOETS - Winter</u> | | | |
| On Peak | \$ 0.11136 | 68,160 | \$ 7,590 |
| Off Peak | \$ 0.04354 | 92,742 | \$ 4,038 |
| <u>CCN</u> | | | |
| Level 2 | \$ 0.21126 | 242,133 | \$ 51,153 |
| Level 3 | \$ 0.26408 | 45,208 | \$ 11,939 |
| Total Revenue | | 552,114 | \$ 93,738 |
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