Exhibit No.:

Issues: Rate Design Witness: Janice Pyatte

Sponsoring Party: MoPSC
Type of Exhibit: Surrebuttal Testimony

Case No.: ER-2001-299
Date Testimony Prepared: May 17, 2001

## MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

Date 5 25/01 Case No. ER 2001-299

Reporter Ken

SURREBUTTAL TESTIMONY

OF

JANICE PYATTE

THE EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2001-299

Jefferson City, Missouri May, 2001

## SURREBUTTAL TESTIMONY 1 **OF** 2 JANICE PYATTE 3 THE EMPIRE DISTRICT ELECTRIC COMPANY 4 CASE NO. ER-2001-299 5 6 7 Q. Please state your name and business address. 8 My name is Janice Pyatte and my business address is Missouri Public Service Α. 9 Commission, P. O. Box 360, Jefferson City, Missouri 65102. 10 Q. Are you the same Janice Pyatte who filed direct testimony in this case on April 11 3, 2001 on the issue of Sales and Revenues, filed direct testimony on April 10, 2001 on the 12 issues of Class Cost of Service and Rate Design, and filed rebuttal testimony on May 3, 2001 13 on the issues of Class Cost of Service and Rate Design? 14 A. Yes, I am. 15 Q. What is the purpose of your surrebuttal testimony in this case? 16 A. My surrebuttal testimony will address item 4(d) on the List of Issues; namely, 17 what is the appropriate rate design treatment of the Interim Energy Charge? 0. What is the Interim Energy Charge? 18 19 Α. The Interim Energy Charge (IEC) is a charge of 0.54 cents per kWh that is 20 proposed in the Stipulation and Agreement Regarding Fuel and Purchased Power Expense 21 filed May 14, 2001 in this case. This proposed charge was developed by the parties to the

Stipulation and Agreement (Company, Staff, OPC) to address the potential effects of

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volatility in natural gas and wholesale electricity prices. The proposed IEC would collect approximately \$20 million annually from Missouri retail customers. It would be in effect for as long as 24 months and the money collected via the IEC would be subject to refund at the end of the period.

- Q. How does the Interim Energy Charge relate to the determination of the appropriate allocation of any increase in revenues to customer classes?
- A. The Stipulation and Agreement Regarding Fuel and Purchased Power Expense specifies that the IEC be an equal cents per kWh to all customers. The Staff's rate design proposal described in this testimony addresses how any additional revenue (above the \$20,000,000 collected annually by the IEC) should be collected.
  - Q. What is the Staff's recommendation on the rate design treatment of the IEC?
- A. The Staff's recommendation is that the IEC should be collected <u>in addition to</u> the changes in class revenues proposed in my direct rate design testimony. Schedule 1 illustrates the outcome of this proposal in the hypothetical situation where the Commission orders an overall increase of \$30,000,000 (approximately 15%). In this example, \$10 million (approximately 5%) is distributed in accordance with the Staff's rate design proposal and \$20 million is recovered through the IEC charge.
- Q. Will adding the IEC "on top of" the Staff's proposal for class revenues result in "double-counting" in fuel cost recovery?
- A. No. Exhibit A attached to the Stipulation and Agreement Regarding Fuel and Purchased Power Expense shows that the 0.54 cents per kWh IEC charge represents the amount by which "forecasted" fuel and purchased power expenses exceed "base" fuel and purchased power expenses. The Staff's class cost-of-service study includes the "base" fuel

Surrebuttal Testimony of Janice Pyatte

- 1 and purchased power expenses. So, it is appropriate to make the class revenue shifts
- 2 proposed by Staff for the base amount, and then add the IEC amount as an equal cents per
- 3 kWh.

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- Q. Does this conclude your surrebuttal testimony?
- 5 A. Yes, it does.

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

IN THE MATTER OF THE APPLICATION OF THE ENDISTRICT ELECTRIC CON A GENERAL RATE INCRE	MPANY FOR	) ) Case No. ER-2001-299 )
A	AFFIDAVIT (	OF JANICE PYATTE
STATE OF MISSOURI	)	
COUNTY OF COLE	) ss )	
testimony to be presented in	the above case is knowledge o	
		Janice Pyatte
Subscribed and sworn to bef	ore me this	17 <sup>th</sup> day of May, 2001.
My commission expires	DAWN L. H Notary Public - State County of C v Commission Expir	Notary Public

					\$ to Refundable	% Change due		
	Current	% Change to	\$ Change to	Current	\$0.0054	Refundable	Overall \$	Overall %
Cost of Service Class/Tariff	Revenues	Rate Schedules	Rate Schedules	kWh Sales	Fuel Charge	Fuel Charge	Increase	Increase
RESIDENTIAL	\$93,046,756	5.0%	\$4,610,931	1,458,495,987	\$7,875,878	8.5%	\$12,486,810	13.4%
SMALL GENERAL SERVICE:		;					ļ	
Commercial Service	\$22,974,537	2.5%	\$569,252	320,897,158	\$1,732,845	7.5%	\$2,302,096	10.0%
Small Heating	\$5,532,323	2.5%	\$137,077	94,106,265	\$508,174	9.2%	\$645,251	11.7%
Feed Mills	\$117,329	2.5%	\$2,907	1,291,512	\$6,974	5.9%	\$9,881	8.4%
Traffic Signals	\$24,170	2.5%	\$599	456,549	\$2,465	10.2%	\$3,064	12.7%
Total Small GS	\$28,648,358		\$709,835	416,751,484	\$2,250,458	7.9%	\$2,960,293	10.3%
LARGE GENERAL SERVICE:								
Total Electric Buildings	\$15,657,174	5.0%	\$775,891	307,262,102	\$1,659,215	10.6%	\$2,435,106	15.6%
General Power	\$37,337,264	5.0%	\$1,850,248	750,116,735	\$4,050,630	10.8%	\$5,900,878	15.8%
Total Large GS	\$52,994,438		\$2,626,139	1,057,378,836	\$5,709,846	10.8%	\$8,335,985	15.7%
LARGE POWER	\$24,792,524	7.6%	\$1,888,692	648,098,300	\$3,499,731	14.1%	\$5,388,423	21.7%
LANGE FOWER	Ψ2 1,7 52,32 1	7.075	<del>42</del> ,,	, ,	1.7			
SPECIAL CONTRACTS	\$1,868,004	7.6%	\$142,304	55,098,173	\$297,530	15.9%	\$439,835	23.5%
ELECTRIC FURNACE	\$94,693	5.0%	\$4,693	2,081,160	\$11,238	11.9%	\$15,931	16.8%
LIGHTING								
Street Lighting	\$904,535	5.0%	\$ <del>44</del> ,824	15,350,916	\$82,895	9.2%	\$127,719	14.1%
Private Lighting	\$2,770,142	5.0%	\$137,274	17,149,283	\$92,606	3.3%	\$229,880	8.3%
Special Lighting	\$132,482	5.0%	\$6,565	1,585,158	\$8,560	6.5%	\$15,125	11.4%
Total Lighting	\$3,807,158		\$188,664	34,085,357	\$184,061	4.8%	\$372,725	9.8%
TOTAL MO RETAIL	\$205,251,931	5.0%	\$10,171,258	3,671,989,297	<b>\$19,828,742</b>	9.7%	\$30,000,000	14.6%