

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

In the Matter of Kansas City Power & Light)	<u>File No. ER-2014-0370</u>
Company's Request for Authority to Implement a)	YE-2015-0194
General Rate Increase for Electric Service)	YE-2015-0195

MOTION FOR LEAVE TO CORRECT TESTIMONY OF ROBIN KLIETHERMES

COMES NOW the Staff of the Missouri Public Service Commission (Staff), and respectfully requests the Commission permit it leave to correct the testimony of Staff witness Robin Kliethermes and offer it into the record after an opportunity for her to be recalled to the stand to be questioned about the corrections. In support of its Motion Staff states:

1. On October 30, 2014, Kansas City Power & Light Company filed direct testimony with the Missouri Public Service Commission (Commission) to implement a general rate increase for electric service.

2. On April 16, 2015, Staff filed its *Staff's Rate Design and Class Cost-of-Service Report* as ordered by the Commission Ordered Procedural Schedule in this case.

3. On May 7, 2015, Staff, including Ms. Robin Kliethermes, filed Rebuttal Testimony in this case.

4. On June 5, 2015 all Parties including Staff witness Ms. Robin Kliethermes filed Surrebuttal testimony.

5. All parties to this action, except for Kansas City Power & Light Company, either signed on directly, or did not oppose a *Non-Unanimous Stipulation and Agreement* settling issues associated with Class Cost of Service and Rate Design which

was filed before the Commission on June 16, 2015. The *Non-Unanimous Stipulation and Agreement*, filed before the Commission proposes to hold the current residential customer charge at its current level of \$9.00.

6. Ms. Robin Kliethermes took the stand on June 16, 2015 to present evidence in Staff's Class Cost of Service and Rate Design issues listed in the Joint Proposed Issue List. The hearing itself focused primarily on the residential customer charge. During the hearing Ms. Robin Kliethermes was subject to cross examination by the parties, examination by Commissioners, as well as redirect by Staff Counsel. Her pre-filed testimony, however, was not entered into evidence as Ms. Robin Kliethermes was scheduled to testify later in the hearing on the issue of Revenues.

7. During the hearing on June 16, 2015, Mr. Tim Rush of Kansas City Power & Light Company presented evidence in response to a question asked by Commissioner Daniel Hall, found at page 408 of the hearing transcript, regarding costs included in the residential customer charge. Mr. Rush testified "...an awful lot of fixed cost expenses because of the solar rebates that have been given to customers that got into what they call--I think the account's 928, and the MEEIA--they call the opt-out--the pre-MEEIA costs. And that is also reflected in this \$16." This was the first time Staff witness Ms. Robin Kliethermes was made aware that certain items of expense were included in this account, which Staff would not include in the calculation of the residential customer charge.¹ Upon further review, Staff confirmed this error of including certain amortized expenses in the calculation that should have been excluded. This error results in a recommendation, through Staff's CCOS, of a residential customer

¹ The accounts containing the pre-MEEIA costs and solar rebates referenced by Mr. Rush are accounts 908 and 910 respectfully, not 928.

charge of \$11.88 vs. the \$16.49 made in the CCOS report and subsequent rebuttal and surrebutal testimony of Ms. Robin Kliethermes.

8. Ms. Robin Kliethermes has provided an affidavit, attached to this Motion, as *Exhibit A*, showing where in her prefiled testimony, as well as in the June 16, 2015 hearing transcript the residential customer charge of \$16.49 appears rather than the correct amount of \$11.88. This correction is necessary to provide the Commission with the correct Staff figure and the correct data that Staff is relying on for its position on the residential customer charge. Additionally, this information is responsive to matters raised in other party's testimony, and it addresses an issue initially raised in Ms. Robin Kliethermes pre-filed testimony.

9. These corrections do not alter Staff's support of the previously filed *Non-Unanimous Stipulation and Agreement*. Staff requests leave to recall Ms. Robin Kliethermes to the stand to testify as to the corrections made during the week of June 29, 2015. She is available as early as 8:30 am on Monday June 29, 2015 when the hearing resumes to testify to this correction and to permit all parties, and the Commission, the opportunity to examine her on it. Recalling of Ms. Robin Kliethermes to make this correction will not prejudice any party, as each will have the opportunity to question her on the stand and Staff notified them by e-mail on the afternoon of Thursday, June 25, 2015, that it would be making this request.

10. Rule 4 CSR 240-2.130 (10) provides that parties are not permitted to supplement prepared testimony unless the presiding officer or the Commission so orders, but Staff is not seeking to supplement, but, instead, to correct Ms. Robin

Kliethermes's testimony. Staff requests that the Commission permit Ms. Robin Kliethermes to do so.

WHEREFORE Staff requests that the Commission allow it to recall Ms. Robin Kliethermes to the stand to correct her testimony on the issue of the residential customer charge as soon as practicable once the hearings resume during the week of Monday June 29, 2015.

Respectfully submitted,

/s/ Cydney D. Mayfield

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by First Class United States Mail, postage prepaid, on this 26th day of June, 2015, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Cydney D. Mayfield

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OF THE STATE OF MISSOURI**

In the Matter of Kansas City Power & Light)
Company's Request for Authority to Implement) Case No. ER-2014-0370
a General Rate Increase for Electric Service.)

AFFIDAVIT OF ROBIN KLIETHERMES

State of Missouri)
) ss.
County of Cole)

AFFIDAVIT

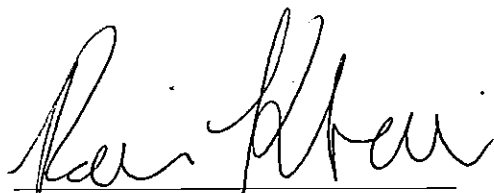
COMES NOW Robin Kliethermes and on her oath declares:

Locations in testimony where \$16.49 erroneously appears, which is hereby corrected to \$11.88:

- Staff's Rate Design and Class Cost-of-Service Report (filed on April 16th, 2015): Page 35, Line 21,
- Rebuttal Testimony of Robin Kliethermes (filed on May 7th, 2015): Page 2, Line 19, and at footnote 1, and
- Surrebuttal Testimony of Robin Kliethermes (filed on June 5th, 2015): Page 2, Line 18, and Page 3 at footnote 3,

Consistent corrections would also be made to Transcript -- Volume 11 (Evidentiary Hearing 6-16-15) starting on Page 455, Line 16 and ending on Page 465, Line 6.

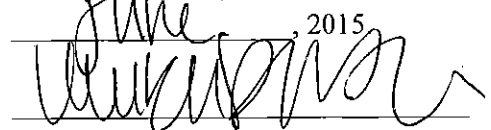
Also, at Surrebuttal Testimony of Robin Kliethermes Page 2, Line 20, the value \$24.05 erroneously appears, which is hereby corrected to \$19.44 and the value \$288.60 erroneously appears, which is hereby corrected to \$233.28.



Robin Kliethermes

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 26th day of

June, 2015


NOTARY PUBLIC

