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Witness: Julie Drago
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**Missouri Public
Service Commission**

SURREBUTTAL TESTIMONY

OF

JULIE DRAGOO

ON BEHALF OF

KCP&L GREATER MISSOURI OPERATIONS COMPANY

**Kansas City, Missouri
September 2016**

SURREBUTTAL TESTIMONY

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1 **Q: Are you the same Julie Dragoo who pre-filed rebuttal testimony in this matter on**
2 **behalf of KCP&L Greater Missouri Operations Company (“GMO” or the**
3 **“Company”)?**

4 **A: Yes.**

5 **Q: What is the purpose of your surrebuttal testimony?**

6 **A: I will respond to the rebuttal testimony of Mr. J. Richmond Burdge submitted in this**
7 **proceeding on behalf of the Office of the Public Counsel (“OPC”) as it relates to**
8 **Advanced Meter Infrastructure (“AMI”) opt-out issues.**

9 **AMI OPT-OUT**

10 **Q: What was the purpose of Mr. Burdge’s rebuttal testimony?**

11 **A: Mr. Burdge responded to Missouri Public Service Commission Staff (“Staff”) witness**
12 **Jerry Scheible’s testimony regarding GMO’s AMI installation and recommended opt-out**
13 **provision for those customers objecting to the installation of an AMI meter.**

14 **Q: Did Mr. Burdge discuss the concerns that have been raised with respect to AMI**
15 **meters?**

16 **A: Yes, he did. He characterized them as related to health and privacy.**

17 **Q: Are these generally the same concerns you have heard raised?**

18 **A: Yes, these are the same concerns raised by Mr. Scheible. Mr. Burdge’s testimony**
19 **addresses those concerns in much the same way GMO would, comparing the Radio**

1 Frequency (“RF”) exposure to cell phones and microwave ovens, with AMI meter RF
2 exposure being far below Federal Communications Commission Standards.

3 **Q: What is OPC’s position regarding the provision of an opt-out for AMI meters?**

4 A: Mr. Burdge states “Any concerns that customers may have about AMI meters should be
5 resolved as satisfactorily as possible.”

6 **Q: Is OPC’s position consistent with GMO’s practices?**

7 A: Yes it is. By the end of September, GMO will have installed approximately 185,000
8 AMI meters. As Mr. Burdge correctly pointed out, one formal complaint is before the
9 MPSC regarding the installation of an AMI meter. GMO’s sister company, Kansas City
10 Power and Light (“KCP&L”) installed approximately 520,000 AMI meters between
11 February 2014 and December 2015, with no formal complaints. The company prides
12 itself in addressing customer concerns timely and thoroughly regardless of the topic, but
13 especially as they relate to AMI meters. In general, when a customer inquiry regarding
14 AMI meters comes into our Customer Contact Center, Customer Service Representatives
15 (“CSRs”) ensure that questions are answered or routed for appropriate follow up.
16 Customers whose questions/concerns are not resolved with a CSR receive a personal
17 contact, and/or a letter explaining our AMI program. This includes more details about
18 the meters and what they can expect about the process. In the majority of cases, this is
19 satisfactory to our customers and we proceed with the meter exchange. In some cases it
20 may take additional information or contact, and generally customer concerns are
21 addressed and the meter is exchanged. In KCP&L’s Missouri service territory, the
22 company received approximately 200 inquiries with zero formal complaints. In GMO,
23 roughly 170 inquiries were received, with one formal complaint. It is worth noting that

1 KCP&L began using meters with one-way communication capabilities more than 22
2 years ago, when its Cellnet system was installed. This system was characterized as an
3 Automated Meter Reading (“AMR”) system, as it was only capable of sending data to the
4 Company and could not receive communications from the Company. The AMR system
5 used RF technology to send data to the Company, as does the AMI system today. The
6 original AMR meters were analog with one-way digital radio modules. However, as
7 metering technology evolved, mechanical meters became obsolete as manufacturing
8 ceased, so all meters manufactured are digital including AMR, AMI, and manually read.
9 While the AMR system provided 20+ years of service and benefit to KCP&L customers,
10 the AMR network communication technology became obsolete leading to our move to
11 AMI and two-way communications.

12 **Q: Does KCP&L have an AMI opt-out option available for customers?**

13 A: No, KCP&L does not offer an opt-out today and it never has.

14 **Q: Has KCP&L had any formal complaints regarding its AMR meters before the
15 MPSC that you are aware of?**

16 A: Not to my knowledge.

17 **Q: Does that conclude your testimony?**

18 A: Yes, it does.

