Exhibit No.: 17

Issue: AMI Opt-Out

Witness: Julie Dragoo

Type of Exhibit: Surrebuttal Testimony

Sponsoring Party: KCP&L Greater Missouri Operations Company

Case No.: ER-2016-0156

Date Testimony Prepared: September 2, 2016

MISSOURI PUBLIC SERVICE COMMISSION

SEP 2 2 2016

CASE NO.: ER-2016-0156

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

OF

JULIE DRAGOO

Case No. ER-2016-0156

Q:	Are you the same Julie Dragoo who pre-filed rebuttal testimony in this matter on			
	behalf of KCP&L Greater Missouri Operations Company ("GMO" or the			
	"Company")?			
A:	Yes.			
Q:	What is the purpose of your surrebuttal testimony?			
A:	I will respond to the rebuttal testimony of Mr. J. Richmond Burdge submitted in this			
	proceeding on behalf of the Office of the Public Counsel ("OPC") as it relates to			
	Advanced Meter Infrastructure ("AMI") opt-out issues.			
	AMI OPT-OUT			
Q:	What was the purpose of Mr. Burdge's rebuttal testimony?			
A:	Mr. Burdge responded to Missouri Public Service Commission Staff ("Staff") witness			
	Jerry Scheible's testimony regarding GMO's AMI installation and recommended opt-out			
	provision for those customers objecting to the installation of an AMI meter.			
Q:	Did Mr. Burdge discuss the concerns that have been raised with respect to AMI			
	meters?			
A:	Yes, he did. He characterized them as related to health and privacy.			
Q:	Are these generally the same concerns you have heard raised?			
A:	Yes, these are the same concerns raised by Mr. Scheible. Mr. Burdge's testimony			
	addresses those concerns in much the same way GMO would, comparing the Radio			
	A: Q: A: Q: A:			

Frequency ("RF") exposure to cell phones and microwave ovens, with AMI meter RF 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 resolved as satisfactorily as possible."

Q: Is OPC's position consistent with GMO's practices?

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A:

Yes it is. By the end of September, GMO will have installed approximately 185,000 AMI meters. As Mr. Burdge correctly pointed out, one formal complaint is before the MPSC regarding the installation of an AMI meter. GMO's sister company, Kansas City Power and Light ("KCP&L") installed approximately 520,000 AMI meters between February 2014 and December 2015, with no formal complaints. The company prides itself in addressing customer concerns timely and thoroughly regardless of the topic, but especially as they relate to AMI meters. In general, when a customer inquiry regarding AMI meters comes into our Customer Contact Center, Customer Service Representatives ("CSRs") ensure that questions are answered or routed for appropriate follow up. Customers whose questions/concerns are not resolved with a CSR receive a personal contact, and/or a letter explaining our AMI program. This includes more details about the meters and what they can expect about the process. In the majority of cases, this is satisfactory to our customers and we proceed with the meter exchange. In some cases it may take additional information or contact, and generally customer concerns are addressed and the meter is exchanged. In KCP&L's Missouri service territory, the company received approximately 200 inquires with zero formal complaints. In GMO, 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.
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- 12 Does KCP&L have an AMI opt-out option available for customers? Q:
- 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 Does that conclude your testimony? Q:
- 18 Yes, it does. A:

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of KCP&L Greater Missouri Op Company's Request for Authority to Impleme A General Rate Increase for Electric Service	,	. ER-2016-0156				
AFFIDAVIT OF JULIE DRAGOO .						
STATE OF MISSOURI						
COUNTY OF JACKSON)						
Julie Dragoo, being first duly swom or	his oath, states:	v ²				
1. My name is Julie Dragoo. I w	rk in Kansas City, Missouri,	, and I am employed				
by Kansas City Power & Light Company as D	ector, Revenue Management	•				
2. Attached hereto and made a	part hereof for all purposes	s is my Surrebuttal				
Testimony on behalf of KCP&L Greater Misse	iri Operations Company cons	sisting of three				
(3) pages, having been prepared in writte	form for introduction into ev	vidence in the above-				
captioned docket.						
3. I have knowledge of the matter	set forth therein. I hereby s	wear and affirm that				
my answers contained in the attached testimo	y to the questions therein pro	opounded, including				
any attachments thereto, are true and accura	to the best of my knowled	ge, information and				
Subscribed and sworn before me this	Hadel Corver day of August, 2016.					
~	Mica A. C	<u>~</u>				
My commission expires:	NICOLE Notary Public State of Commissioned C	A. WERRY c - Notary Seal f Missouri or Jackson County fres: February 04, 2019 umber: 14391200				