

Exhibit No.:
Issue: Revenue – Customer Growth
Witness: Robin Kliethermes
Sponsoring Party: MoPSC Staff
Type of Exhibit: True-up Rebuttal Testimony
Case No.: ER-2014-0370
Date Testimony Prepared: July 15, 2015

MISSOURI PUBLIC SERVICE COMMISSION

REGULATORY REVIEW DIVISION

TRUE-UP REBUTTAL TESTIMONY

OF

ROBIN KLIETHERMES

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2014-0370

*Jefferson City, Missouri
July 15, 2015*

Staff Exhibit No. 254
Date 7/20/15 Reporter Jenni
File No. ER-2014-0370

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

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

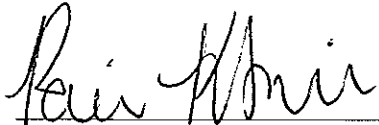
AFFIDAVIT OF ROBIN KLIETHERMES

State of Missouri)
) ss.
County of Cole)

AFFIDAVIT

COMES NOW Robin Kliethermes and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached True-Up Rebuttal Testimony and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.


_____)
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 15th day of July, 2015.


_____)
NOTARY PUBLIC

1 **TRUE-UP REBUTTAL TESTIMONY**

2 **OF**

3 **ROBIN KLIETHERMES**

4 **KANSAS CITY POWER & LIGHT**

5 **CASE NO. ER-2014-0370**

6 Q. Please state your name and business address.

7 A. Robin Kliethermes, 200 Madison Street, Governor Office Building, Jefferson
8 City, Missouri.

9 Q. By whom are you employed and in what capacity?

10 A. I am a Regulatory Economist II with the Missouri Public Service Commission
11 ("Commission").

12 Q. Are you the same Robin Kliethermes who has previously filed true-up direct
13 testimony, surrebuttal testimony and rebuttal testimony and filed testimony as part of Staff's
14 Revenue Requirement Cost of Service Report and Staff's Rate Design and Class Cost of
15 Service Report in this case?

16 A. Yes.

17 Q. What is the purpose of your true-up rebuttal testimony?

18 A. The purpose of my true-up rebuttal testimony is to update Staff's true-up
19 customer growth adjustment to rate revenues.

20 **STAFF'S UPDATED CUSTOMER GROWTH ADJUSTMENT TO RATE REVENUES**

21 Q. Did Staff update its true-up customer growth adjustment based on the
22 additional information received from Kansas City Power & Light ("KCPL")?

23 A. Yes, around noon on July 14, 2015, Staff was notified that KCPL had
24 inadvertently excluded 20 manually billed customers from the May customer counts. Eight of

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1 the 20 customers were included in the Large General Service (“LGS”) class, 2 in the Large
2 Power Class (“LPS”) class, 3 in the Medium General Service (“MGS”) and Small General
3 Service (“SGS”) classes and 4 in the Residential class.

4 Staff is still reviewing the information, but from a general overview, the customer
5 counts seem reasonable. Table 1, below, shows the change in the number of customers from
6 December 31, 2014, to May 31, 2015 using the corrected May customer numbers:¹

Class	Difference From Dec. 2014 to May, 2015
Large General Service	(23)
Medium General Service	(5)
Small General Service	19
Residential	1,772

7
8 Unless Staff discovers an error in the recently provided May customer counts, Staff
9 will annualize kWh sales and revenue for changes in customer growth using the corrected
10 May 2015 customer counts.

11 Q. Prior to KCPL sending corrected customer counts for May 2015, did Staff have
12 concerns with KCPL’s true-up customer growth adjustment that relied on May 2015 customer
13 counts?

14 A. Yes. Staff had concerns with the fluctuation in the number of customers from
15 December 2014 to May 2015 and specifically from April 2015 to May 2015. These concerns
16 were outlined in detail in my true-up direct testimony. Staff followed up those concerns with
17 data requests and received conflicting data from KCPL concerning the change in customer
18 counts from December 31, 2014 to the true-up date May 31, 2015, especially for the LGS

¹ 13 of the 23 customers that left the LGS class switched into the MGS class.

3 class. This difficulty hampered Staff's determination of actual customer counts upon which to
4 calculate a growth adjustment, until Staff received the corrected numbers on July 14, 2015.

6 Table 1, below summarizes the information Staff has received from KCPL through
7 data requests or workpapers regarding individual customers moving into and out of the LGS
8 class.

Table 1: LGS Class Customer Summary (DR's 330.1, 327, 328)
April 2013 - December 2014 -

Large General Service Class	December 2014	May 2015	Total
Customers Disconnecting from KCPL	-133	-29	-162
Customers Connecting to KCPL	109	32	141
Customers Switched into LGS	7		7
Customers Switched out of LGS		-13	-13
Total	-17	-10	-27

10 Additionally, prior to KCPL correcting the customer counts, Table 2 shows the
11 number of LGS customers KCPL reported in April 2013, March 2014, December 2014 and
12 May 2015.

Table 2: LGS Customer Counts

Rate Classes	Apr-13	Mar-14	Dec-14	May-15	Change in Customers since April 2013
Large General Service Class	1,026	1,027	1,011	980	-46

17 After the correction in May customer counts was made, the change in the number of
18 customers since April 2013 changes to a loss of 38 LGS customers instead of 46. Although,
19 this still seems high, data requests that Staff has received accounts for 27² of the 38
20 customers, leaving a difference of 11 customers rather than a difference of 19 unexplained
21 customer losses. Staff requests that KCPL continue to investigate the 11 unexplained
22 customer losses and in the next general rate case KCPL work to resolve customer count issues

² See Table 1.

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1 | prior to true-up, since the true-up time frame to analyze data and address additional issues is
2 | very short.

3 | Q. Does this conclude your testimony?

4 | A. Yes.