

FILED  
March 6, 2017  
Data Center  
Missouri Public  
Service Commission

Exhibit No.: 208  
Issue(s): Policy  
Witness: Natelle Dietrich  
Sponsoring Party: MoPSC Staff  
Type of Exhibit: Surrebuttal Testimony  
Case No.: ER-2016-0285  
Date Testimony Prepared: January 27, 2017

**MISSOURI PUBLIC SERVICE COMMISSION**  
**COMMISSION STAFF DIVISION**

**SURREBUTTAL TESTIMONY**

**OF**

**NATELLE DIETRICH**

~~Staff~~ Exhibit No. 208  
Date 2-28-17 Reporter KF  
File No. ER-2016-0285

**KANSAS CITY POWER & LIGHT COMPANY**

**CASE NO. ER-2016-0285**

Jefferson City, Missouri  
January 2017

1 **SURREBUTTAL TESTIMONY**

2 **OF**

3 **NATELLE DIETRICH**

4 **KANSAS CITY POWER & LIGHT COMPANY**

5 **CASE NO. ER-2016-0285**

6 Q. Please state your name and business address.

7 A. My name is Natelle Dietrich. My business address is 200 Madison St.,  
8 Jefferson City, Missouri 65101.

9 Q. Are you the same Natelle Dietrich that previously filed Direct Testimony in  
10 this case on November 30, 2016 and December 14, 2016?

11 A. Yes I am.

12 Q. What is the purpose of your surrebuttal testimony?

13 A. The purpose of my surrebuttal testimony is to respond to the rebuttal  
14 testimonies of Kansas City Power & Light Company's ("KCPL") witness Tim M. Rush and  
15 Natural Resources Defense Council's (NRDC) witness Noah Garcia as their testimonies  
16 discuss Staff's position on the Clean Charge Network (CCN), filed on December 30, 2016.

17 Q. To what specifically related to the CCN rebuttal testimonies will you be  
18 responding?

19 A. At page 50, lines 7 and 8, of his December 30, 2016, rebuttal testimony  
20 Mr. Rush states, "...[KCPL] does not understand Staff's position that this regulated service  
21 should be treated below the line. If the service is regulated, it should be treated above the  
22 line, unless the Company's investment is determined to be imprudent." Similarly, Mr. Garcia,  
23 at page 4, lines 9 and 10, states, "NRDC appreciatès Staff's consideration of these issues, but

Surrebuttal Testimony of  
Natelle Dietrich

1 does not agree that investment should be associated with the CCN be recorded 'below-the-  
2 line.

3 Q. Does Staff agree with the comments of Mr. Rush and Mr. Garcia?

4 A. Yes it does. As indicated in the rebuttal testimony of Staff witness  
5 Byron Murray filed on January 6, 2017, Staff reviewed the rebuttal testimonies of Mr. Rush  
6 and Mr. Garcia and consulted further with Staff Counsel. The CCN, and electric vehicle  
7 charging stations in general, are relatively new, especially in Missouri general rate  
8 proceedings. As such, Staff's position has continued to evolve as it works through the issues  
9 in this case, the Ameren Missouri EV docket (Case No. ET-2016-0246), and in  
10 Ameren Missouri's general rate proceeding (Case No. ER-2016-0179).

11 Q. You indicate Staff's position has continued to evolve. What is Staff  
12 recommending in this case with respect to the CCN?

13 A. As explained in the rebuttal testimonies of Mr. Murray, as well as Staff witness  
14 Robin Kliethermes, also filed on January 6, 2017, Staff recommends the costs, expenses, and  
15 revenues associated with the CCN be recorded above-the-line, with an associated revenue  
16 imputation for any costs not covered by the revenue generated by the charging stations. This  
17 continues Staff's position to hold ratepayers harmless.

18 Q. Does this conclude your surrebuttal testimony?

19 A. Yes.

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of Kansas City Power & Light )  
Company's Request for Authority to ) Case No. ER-2016-0285  
Implement A General Rate Increase for )  
Electric Service )

**AFFIDAVIT OF NATELLE DIETRICH**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

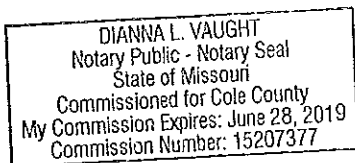
**COMES NOW NATELLE DIETRICH**, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Surrebuttal Testimony; and that the same is true and correct according to her best knowledge and belief.

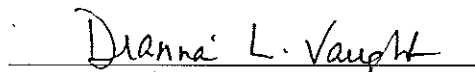
Further the Affiant sayeth not.

  
**NATELLE DIETRICH**

**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 27<sup>th</sup> day of January, 2017.



  
Notary Public