

**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the General Investigation to )  
Examine Issues Surrounding Rate Design for ) Docket No. 16-GIME-403-GIE  
Distributed Generation Customers. )

**NOTICE OF FILING STAFF'S VERIFIED REPLY COMMENTS**

The Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively) files its Reply Comments as required by the Commission's February 16, 2017 Order Setting Procedural Schedule.

**I. Background**

1. On March 11, 2016, Staff filed a Motion to Open Docket. In support of its Motion, Staff attached a Report and Recommendation (R&R) which outlined various issues and procedural considerations.

2. On July 12, 2016, the Commission issued an Order opening this general investigation docket in order to examine various issues surrounding rate structure for Kansas distributed generation (DG) customers.<sup>1</sup>

3. The parties to the docket were "ordered to file comments on how the general investigation should proceed to minimize the need for extensive comment periods."<sup>2</sup> Such comments were to be filed by August 26, 2016.<sup>3</sup>

4. Following receipt of comments, the Commission issued an Order Setting Procedural Schedule on February 16, 2017.<sup>4</sup> The Order Setting Procedural Schedule required

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<sup>1</sup> Order Opening General Investigation, Ordering Clause A (July 12, 2016).

<sup>2</sup> Order Opening General Investigation, Ordering Clause D (July 12, 2016).

<sup>3</sup> *I.e.*, within 45 days of the date of the Order Opening General Investigation.

parties to file initial comments with supporting affidavits by March 17, 2017 and reply comments with supporting affidavits by May 5, 2017.<sup>5</sup>

5. On March 17, 2017, Staff and other parties filed initial comments with supporting affidavits as required by the Commission's Order Setting Procedural Schedule.

## **II. Summary of Staff's Reply Comments**

6. Robert H. Glass, Ph.D., Chief of Economics and Rates for Commission Staff, submits verified Reply Comments in response to the Commission's February 16, 2017 Order Setting Procedural Schedule and in reply to other parties' Initial Comments filed March 17, 2017. Dr. Glass identifies two fundamental differences in position between parties; specifically that the parties disagree on (1) which benefits of distributed generation should be considered; and (2) the appropriate rate design for distributed generation customers.

7. Dr. Glass summarizes the parties' positions on the inclusion of certain benefits, noting Empire, KCP&L, Mid-Kansas, Midwest, Southern Pioneer (joined by KEC), Sunflower, and Westar find little-to-no benefit provided by distributed generation with respect to the utilities' peak demand requirements, and furthermore do not believe unquantifiable benefits such as health and environmental benefits should be considered when setting rates; instead, these utilities favor setting rates using traditional cost of service methodologies. Conversely, Brightergy, CEP, Cromwell, and United Wind advocate including such benefits into the rate design of distributed generation customers; these entities prefer to thoroughly evaluate all potential benefits and distributed generation customers in general. Staff, relying on previous Commission orders, opposes the inclusion of the benefits and costs related to externalities caused by distributed generation customers in the benefit-cost analyses. Furthermore, Staff recognizes

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<sup>4</sup> Order Setting Procedural Schedule (Feb. 16, 2017).

<sup>5</sup> *Id.* at ¶12.

the ineffectiveness of competing benefit-cost studies, and that engineering benefits of distributed generation are location specific and specific to each utility, and therefore more appropriately situated in utility-specific rate case dockets. Finally, the engineering benefits claimed by distributed generation advocates are beyond Staff's expertise, and as a result, Staff defers to the utilities regarding these benefits and costs until contrary evidence is provided.

8. With respect to rate design, Dr. Glass summarizes the utilities' concerns that the current two-part rate design does not adequately capture distributed generation customers' fair share of the utility's fixed costs, which are currently largely embedded in the volumetric energy charge. Several utilities advocate for a three-part rate design, adding a demand charge; alternatively, Empire, Southern Pioneer joined by KEC, and Sunflower propose increasing the customer charge and/or adding a stand-by charge or grid-use charge to further ensure distributed generation customers pay their fair share of fixed costs. Dr. Glass recognizes the distributed generation advocates are concerned with implementing additional fixed costs for distributed generation customers as they believe such could discourage the deployment of distributed generation systems; they also advocate the benefits of distributed generation warrant *no* additional fixed charge, monthly access, or maintenance fees. Staff advocates a rate design structure that is individualized to reflect distributed generation customers' burden on the utility system. Real-time pricing is ideal; however for more stability (for customers), Staff recommends a three-part rate design consisting of a customer charge (dollars per person), demand charge (dollars per kW), and an energy charge (dollars per kWh). Finally, Dr. Glass notes class cost of service studies with distributed generation customers broken out as a separate class filed in future utility-specific rate cases will provide the information necessary to establish appropriate cost-based customer, demand, and energy rates.

WHEREFORE, Staff submits its Reply Comments.

Respectfully submitted,



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In the Matter of the General Investigation to     )  
Examine Issues Surrounding Rate Design for     ) Docket No. 16-GIME-403-GIE  
Distributed Generation Customers.                     )

**VERIFIED REPLY COMMENTS OF COMMISSION STAFF**

**I. Introduction**

*Procedural Background*

1. The Commission's Order Setting Procedural Schedule (Procedural Schedule Order) required parties to file initial comments with supporting affidavits by March 17, 2017.<sup>1</sup> In compliance with the Procedural Schedule Order, Staff and the following parties submitted initial comments in the Docket: Brightergy, LLC (Brightergy); Climate and Energy Project (CEP); Cromwell Environmental, Inc. (Cromwell); Citizens' Utility Ratepayer Boar (CURB); Empire District Electric Company (Empire); Kansas City Power & Light Company (KCP&L); Midwest Energy, Inc. (Midwest); Southern Pioneer Electric Company (Southern Pioneer); Sunflower Electric Power Corporation (Sunflower) and Mid-Kanas Electric Company, LLC (Mid-Kansas); United Wind, Inc. (UW); and Westar Energy, Inc. and Kansas Gas and Electric Company (collectively referred to as Westar).
2. The Procedural Schedule Order also required the parties to collaborate at the scheduled Roundtable Discussions to assist the parties with understanding one another's comments and possibly reach areas of consensus prior to the June 27, 2017, Evidentiary Hearing.
3. After reviewing the initial comments submitted by the parties and participating in the Roundtable Discussions, there is disagreement on which benefits should be considered when

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<sup>1</sup> Procedural Schedule Order, ¶ 12 (Feb. 16, 2017).

designing rates for distributed generation customers and what the appropriate rate structure is for distributed generation customers.

## **II. Opinions Regarding Benefits and Rate Design**

### *Benefits*

11. All of the utilities (Empire, KCP&L, Mid-Kansas, Midwest, Southern Pioneer, Sunflower, and Westar) share very similar opinions with regards to the benefits provided by distributed generation and whether they should be incorporated into rate design. They believe that distributed generation will not help reduce their peak demand requirements. They also do not believe that any externalities or “unquantifiable” (i.e., health and environmental) benefits should be considered. They favor costs and benefits that are quantifiable to the utility. In other words, their preference is to set rates using traditional cost of service methodologies. Using this methodology, benefits provided by a distributed generation customer would be accounted for in the reduction of the utility’s cost of service and passed on to them in the form of lower rates.

12. In contrast, the distributed generation advocates (Brightergy, CEP, Cromwell, and UW) believe that distributed generation benefits utility providers as well as all ratepayers and those benefits need to be incorporated into the rate design. Their preference is to thoroughly evaluate all of the potential benefits (including those that are considered externalities and difficult to quantify) and distributed generation in general.

13. Staff believes it is useful when discussing the benefits and costs of distributed generation to distinguish between *environmental and health benefits*, as well as *grid engineering benefits and costs*. Environmental benefits are for the most part the health benefits of reducing the negative externalities created by fossil fuel generation. The links between the reduction of externalities and health improvement are difficult to establish, and placing a monetary value on

health improvements is even more difficult. Preceding Commission Orders have been critical of the inclusion of externalities in benefit-cost tests. For instance, in Docket No. 08-GIMX-442-GIE, (08-442 Docket) the Commission criticized the Societal Test because of the difficulty in attempting to quantify societal environmental and health benefits.<sup>2</sup> Then in Docket No. 12-GIMX-337-GIE (12-337 Docket), the Commission rejected the Societal Test “finding it to be too vague.”<sup>3</sup> Therefore, Staff opposes the inclusion of the benefits and costs of reduced externalities caused by distributed generation customers in the benefit cost analyses.

14. In this particular Docket, Staff would like to avoid the cost of competing benefit-cost studies. Moreover, the engineering benefits and costs of distributed generation are location specific and specific to each utility and, therefore, any kind of detailed engineering benefit-cost studies are not appropriate in this Docket. The engineering benefits claimed by distributed generation advocates are beyond the expertise of Staff and, as a result, Staff defers to the utilities regarding these benefits and costs until contrary evidence is provided. The goal of this Docket is to develop policy for distributed generation rate design. The setting of actual rates will be made by application in separate, utility-specific docket filings. Thus, it is more appropriate for those studies to be provided in the utility-specific rate case dockets.

#### *Rate Design*

15. For the most part, all of the utilities are concerned about the problems that distributed generation creates given the current rate structure for the residential and small commercial classes. They believe that with their two-part (customer and energy charge) rate structure, where demand-related fixed costs are embedded in the energy charge, distributed

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<sup>2</sup> See Order Setting Energy Efficiency Policy Goals, Determining a Benefit-Cost Test Framework, and Engaging a Collaborative Process to Develop Benefit-Cost Test Technical Matters and an Evaluation, Measurement, and Verification Scheme, ¶ 36, 08- 442 Docket (Jun. 2, 2008).

<sup>3</sup> See Order, ¶ 15, 12-337 Docket (Mar. 6, 2013).

generation customers avoid paying their share of the fixed costs when they are able to decrease their energy usage. While distributed generation customers are able to generate their own energy throughout different parts of the day, they still rely on the utility's energy during peak hours, when energy is more expensive. Because of the failure to collect all of the customer demand with the current rate structure, most of the utilities favor a separate rate class for distributed generation customers with some type of additional fixed charge.

16. Several of the utilities favor adding a demand component for distributed generation customers to the existing two-part rate structure, making it a three-part tariff. They believe that by removing the demand-related fixed costs from the customer charge and adding a demand charge, the rates will be more cost-based and provide better price signals.

17. While Midwest is also in favor of adding a demand component, they argued that having a separate rate structure for distributed generation customers is not advisable. They believe the existing rate schedules already accommodate a wide range of end users and load shapes. For example, the same residential rate schedule applies to a small apartment and a large private residence. Therefore, Midwest is proposing to institute a three-part rate structure for all of its residential customers, not just distributed generation customers.

18. As another possible rate design option, some utilities (Empire, Southern Pioneer and KEC, and Sunflower) proposed increasing the customer charge and/or adding a stand-by charge or a grid-use charge. The theory supporting this is that these charges would further help ensure cost recovery for the utility, as well as ensure the distributed generation customers pay their fair share of the fixed costs.

19. Some of the distributed generation advocates have concerns with the implementation of additional fixed charges because they believe it could act as a deterrent for



future deployment of distributed generation systems. They also believe that the benefits of distributed generation justify those customers not having to pay any additional fixed charges. For example, Brightergy claimed that distributed generation solar adds enough quantifiable benefits to the grid to justify no added monthly access or maintenance fees. For the most part, the distributed generation advocates believe that it is premature to fashion a rate design without further evaluation of distributed generation and all of the potential benefits it provides.

20. Staff believes that rate design for distributed generation customers should be individualized to reflect their impact on the utility system. Real-time pricing with a fixed charge making up any revenue deficiency would be ideal because it individualizes rate design by having customers pay the market price of electricity at the time it is consumed, which eliminates the concerns of covering the capacity costs that distributed generation imposes. However, most customers would likely prefer a rate structure that is more stable and predictable, making the next best thing an approximation of real-time pricing. This can be accomplished by using a rate design that includes time-varying rates. Therefore, the best rate design for distributed generation customers is a three part rate design consisting of a customer charge (dollars per person), demand charge (dollars per kW), and an energy charge (dollars per kWh). This would be the best approximation for incorporating capacity demand into the rate design for distributed generation customers. By using a three part rate design, DG customers would be charged for the demand they used and not charged for the demand they did not use. When their own generation allows them to use less capacity, they would only pay for the capacity they used. Finally, class cost of service studies with distributed generation customers broken out as a separate class filed in future rate cases will have the information necessary to establish appropriate cost-based customer, demand, and energy rates.

### **III. Conclusion**

#### *Recommendation*

37. Staff's recommendation for analysis of the benefits and costs of distributed generation distinguishes between the benefits associated with environmental and health externalities and engineering benefits and costs.

38. Staff is opposed to including environmental and health externalities in the analysis of distributed generation rate design because the benefits are indirect, difficult to measure with any precision, and the Commission has recently rejected including externalities in benefit-cost analysis.

39. Evaluating the engineering benefits and costs of distributed generation is beyond the expertise of Staff and, as a result, Staff defers to the utilities on this matter unless better analysis becomes available.

40. In addition, performing exhaustive studies to evaluate distributed generation and the abstract benefits it provides is not appropriate in a docket designed to develop policy. Those studies more appropriately belong in the subsequent utility-specific rate case dockets.

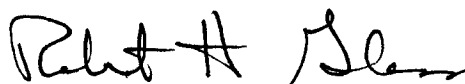
41. Finally, Staff's proposed three-part rate design benefits both the utilities and distributed generation customers. It encourages conservation for distributed generation customers and allows them some control over the fixed component of their monthly electricity bills, while also helping address some of the cost recovery problems distributed generation creates for the utilities. Plus, by separating distributed generation customers into a separate class, their rate design can be based on the traditional class cost of service used in full rate cases.

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  ) ss.  
COUNTY OF SHAWNEE            )

**Docket No. 16-GIME-403-GIE**

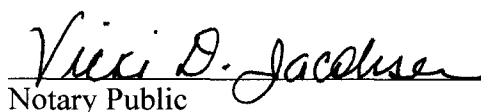
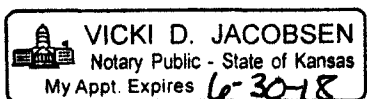
**VERIFICATION**

Jeffrey D. McClanahan, being duly sworn upon his oath deposes and states that he is the Acting Director of Utilities for the Kansas Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Reply Comments*, and attests that the statements contained therein are true and correct to the best of his knowledge, information and belief.



Robert H. Glass, Ph.D., Chief-Economics and Rates  
State Corporation Commission of the  
State of Kansas

Subscribed and sworn to before me this 5<sup>th</sup> day of May, 2017.

  
Notary Public

My Appointment Expires:     June 30, 2018

## **CERTIFICATE OF SERVICE**

16-GIME-403-GIE

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing Staff's Verified Reply Comments was served via electronic service this 5th day of May, 2017, to the following:

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