

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Black Hills/)
Kansas Gas Utility Company, LLC, d/b/a Black)
Hills Energy, For Approval of the Commission) Docket No. 17-BHCG-389-TAR
For a Gas System Reliability Surcharge Per K.S.A.)
66-2201 through 66-2204)

DIRECT TESTIMONY OF KATHY McNULTY KROPP

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Kathy McNulty Kropp. My business address is 1515 Wynkoop Street,
3 Denver, CO 80202.

4

5 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

6 A. I am employed by Black Hills Service Company, LLC (“BHSC”) as a Financial
7 Manager. In my role, I provide financial management support to Black Hills/Kansas
8 Gas Utility Company, LLC, d/b/a Black Hills Energy (“Black Hills”) which includes
9 strategic plan development, budget preparation, financial reporting and analysis, and
10 financial counsel to operating management.

11

12 Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND BUSINESS
13 EXPERIENCE.

14 A. I graduated from the University of Florida with a Bachelor of Science in Accounting
15 and I graduated from the University of Miami with a Master of Professional
16 Accounting. I hold a Certified Public Accountant certificate in the State of Florida,

1 although it is currently inactive. I assumed my current role in March 2016 as a result
2 of the Black Hills Energy acquisition of SourceGas. At SourceGas I held the position
3 of Senior Manager, Business Valuation, where I was responsible for the five-year
4 strategic plan, economic valuation modeling and gross margin forecasting. Prior to
5 that I was employed by Xcel Energy for nineteen years. At Xcel Energy I held various
6 positions in the Regulatory and Accounting organizations. As a Principal Rate
7 Analyst, Revenue Requirements, I managed and coordinated the preparation of cost
8 recovery models and the related testimony for various state filings. Within the
9 Accounting organization my roles included: Principal Financial Consultant
10 Regulatory Accounting; Principal Financial Consultant, Project Development and
11 Services; Manager, Regulatory Accounting Policy and Reporting, and Manager,
12 Accounting Research. Before my employment at Xcel Energy, I worked for Deloitte
13 & Touche, LLP in Denver, and Florida Power & Light Company in Miami, Florida.

14

15 Q. **WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

16 A. The purpose of my testimony is to support the calculation of the revenue requirement
17 by customer class for the Black Hills proposed Gas System Reliability Surcharge
18 (GSRS).

19

20 Q. **ARE YOU SPONSORING ANY EXHIBITS?**

21 A. Yes, I am sponsoring three exhibits. Exhibit KMK-1 shows the calculation of the
22 proposed GSRS revenue. Exhibit KMK-2 details the plant and deferred taxes, and
23 KMK-3 shows the class allocation of the GSRS surcharge.

1

2 Q. PLEASE EXPLAIN EXHIBIT KMK-1.

3 A. Pursuant to the provisions of K.S.A. 66-2204, Exhibit KMK-1 shows the increase to
4 rate base and the calculation of the GSRS revenue requirement. The proposed
5 incremental revenue increase is \$580,680.

6

7 Q. DOES THE REVENUE REQUIREMENT EXCEED THE MINIMUM REVENUE
8 REQUIREMENTS SET FORTH IN SENATE BILL 414?

9 A. Yes. K.S.A. 66-2203 states that “the commission may not approve a GSRS to the
10 extent it would produce total annualized GSRS revenues below the lesser of
11 \$1,000,000 or 1/2 % of the natural gas public utility’s base revenue level approved by
12 the commission in the natural gas public utility’s most recent general rate proceeding.”
13 Based on Black Hills’ most recent general rate proceeding, that amount would total
14 \$238,898.

15

16 Q. PLEASE EXPLAIN THE COMPONENTS OF THE FILED RATE BASE.

17 A. Components of the rate base calculation include Gross Plant, which is the original cost
18 of all eligible projects, less any related cost of removal and abandonment of the
19 existing system; Accumulated Depreciation, which has been calculated by project
20 based on the approved depreciation rate for that type of plant; and Accumulated
21 Deferred Income Taxes, which has been calculated by project based on the type of
22 plant. Exhibit KMK-2 details the GSRS net plant calculation and the deferred taxes
23 calculation.

1

2 Q. WERE ANY OF THE ELIGIBLE PROJECTS BEING CONSIDERED INCLUDED
3 IN BLACK HILLS' LAST GENERAL RATE FILING?

4 A. No. None of the projects included in the GSRS filing were included in Black Hills'
5 last rate filing. These projects were completed subsequent to the December 31, 2013
6 test period included in Black Hills' last general rate filing. In addition, none of the
7 projects being considered in this GSRS filing were included in the Company's GSRS
8 filing in Docket Number 16-BHCG-277-TAR.

9

10 Q. HOW WAS THE RATE OF RETURN CALCULATED?

11 A. The Stipulated Settlement Agreement in Black Hills' most recent rate case, Docket
12 No. 14-BHCG-502-RTS, establishes the provisions for the return calculation. It states,
13 "For purposes of calculating Black Hills' Gas System Reliability Surcharge ("GSRS"),
14 the carrying charges to be applied to recoverable investments in such filings shall be
15 calculated using a carrying charge of 9.763% gross of tax, which is based on state and
16 federal tax rates in effect as of the date of this Agreement."

17

18 Q. PLEASE EXPLAIN EXHIBIT KMK-3.

19 A. Exhibit KMK-3 shows the allocation of the GSRS revenue by class. The customer
20 class allocation is pursuant to the Stipulated Settlement Agreement in Docket No. 14-
21 BHCG-502-RTS.

22

1 Q. DOES THE ALLOCATION OF THE PROPOSED GSRS SURCHARGE FALL
2 WITHIN THE PARAMETERS AS SET FORTH IN THE STATUTE?

3

4 A. Yes. K.S.A 66-2204 (e) (1) states, “A GSRS shall be charged to customers as a
5 monthly fixed charge and not based on volumetric consumption. Such monthly charge
6 shall not increase more than \$.40 per residential customer over the base rates in effect
7 for the initial filing of a GSRS. Thereafter, each filing shall not increase the monthly
8 charge more than \$.40 per residential customer over the most recent filing of a GSRS”.
9 The proposed GSRS increase is \$0.29 per month for a residential customer. Added to
10 the current GSRS for a residential customer, the proposed residential GSRS is \$0.69
11 per month.

12

13 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

14 A. Yes it does.

VERIFICATION

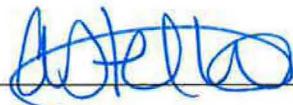
STATE OF COLORADO)
) ss:
COUNTY OF DENVER)

I, KATHY MCNULTY KROPP, being first duly sworn on oath, depose and state that I am the witness identified in the foregoing prepared direct testimony, that I have read the testimony and I am familiar with its contents, and that the facts set forth are true to the best of my knowledge, information and belief.



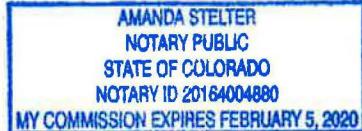
Kathy McNulty Kropf

SUBSCRIBED AND SWORN to before me this 15 day of February, 2017.



Notary Public

Appointment/Commission Expires:



Black Hills/Kansas Gas Utility Company, LLC
d/b/a Black Hills Energy
Gas System Reliability Surcharge Filing - Feb 2017

Exhibit KMK-1

2/15/2017

| | TOTAL | New Investment 11/1/15-12/31/16 | UPDATED 16-BHCG-277-TAR DEC 2015 7/1/14-10/31/15 |
|---|----------------------|---------------------------------------|---|
| GAS PLANT ORIGINAL COST | \$ 14,482,975 | \$ 6,243,896 | \$ 8,239,079 |
| LESS: ACCUMULATED DEPRECIATION (1) | (1,057,017) | (331,252) | (725,765) |
| NET GAS PLANT IN SERVICE | <u>\$ 15,539,992</u> | <u>\$ 6,575,148</u> | <u>\$ 8,964,844</u> |
| | | | |
| LESS: ACCUMULATED DEFERRED INCOME TAXES | 4,048,466 | 1,672,761 | 2,375,705 |
| TOTAL GSRS RATE BASE | <u>\$ 11,491,526</u> | <u>\$ 4,902,387</u> | <u>\$ 6,589,139</u> |
| | | | |
| CARRYING CHARGE (2) | 9.7630% | 9.7630% | 9.7630% |
| | | | |
| PRE-TAX REQUIRED RETURN | \$ 1,121,918 | \$ 478,620 | \$ 643,298 |
| | | | |
| DEPRECIATION EXPENSE | 237,542 | 103,965 | 133,577 |
| | | | |
| GSRS REVENUE REQUIREMENT | \$ 1,359,460 | \$ 582,585 | \$ 776,875 |
| | | | |
| TRUE-UP OF RECOVERIES | <u>27,998</u> | <u></u> | <u></u> |
| | | | |
| REVISED GSRS REVENUE REQUIREMENT | \$ 1,387,458 | \$ 582,585 | \$ 776,875 |
| | | | |
| PREVIOUSLY AUTHORIZED GSRS | <u>806,778</u> | <u></u> | <u></u> |
| | | | |
| INCREMENTAL INCREASE IN GSRS REVENUE | \$ 580,680 | \$ 580,680 | \$ 580,680 |
| | | | |
| LESS: STATUTORY LIMIT ADJUSTMENT | - | - | - |
| | | | |
| INCREMENTAL GSRS REVENUE REQUEST | <u>\$ 580,680</u> | <u></u> | <u></u> |

(1) Accumulated Depreciation is a debit balance due to accumulated depreciation associated with retirements, and is therefore an increase to net plant; project additions are relatively new and do not have high accumulated depreciation balances yet to offset the balances on the retirements.

(2) Carrying Charge of 9.763% gross of tax was established in Docket 14-BHCG-502-RTS Stipulation and Agreement

Exhibit KMK-3

Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy GSRS Allocation