

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

TESTIMONY IN SUPPORT OF THE
NON-UNANIMOUS STIPULATION AND AGREEMENT

PREPARED BY

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UTILITIES DIVISION

KANSAS CORPORATION COMMISSION

June 20, 2017

I. INTRODUCTION

Qualifications

Q. What is your name?

A. Robert H. Glass.

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

A. The Kansas Corporation Commission (KCC) employs me as the Chief of Economics and Rates.

Q. What is your business address?

A. 1500 SW Arrowhead Road, Topeka, Kansas, 66604-4027.

Q. Are you the same Robert H. Glass who, in this Docket, filed initial comments on March 17, 2017, and reply comments on May 5, 2017?

A. Yes.

Organization

Q. What is the purpose of your testimony?

A. I am testifying in Support of the Non-Unanimous Stipulation and Agreement (S&A) submitted by Staff of the State Corporation Commission of the State of Kansas ("Staff," and "Commission," respectively), Westar Energy, Inc. and Kansas Gas and Electric Company (collectively, "Westar"), Kansas City Power & Light Company (KCP&L), Sunflower Electric Power Corporation (Sunflower), Mid-Kansas Electric Company, LLC (Mid-Kansas), Southern Pioneer Electric Company (Southern Pioneer), Kansas Electric Cooperatives, Inc. (KEC), Midwest Energy, Inc. (Midwest Energy), Empire District Electric Company (Empire), Brightergy, LLC, United Wind, Inc., and IBEW 304, (collectively, "Settling Parties").

1 **Q. How is your testimony structured?**

2 A. First, I will discuss the substantive issues addressed in the S&A. Next, I will
3 address the Commission's standard of review for settlement agreements. Finally, I will
4 conclude by recommending the Commission accept the S&A as a reasonable resolution
5 of the issues in this Docket.

6 **II. ANALYSIS**

7 **Terms of the Stipulation and Agreement**

8 **Q. Please list the terms of the Stipulation and Agreement.**

9 A. The terms of the S&A are as follows:

10 1. DG customers should be uniquely identified within the ratemaking
11 process because of the potentially significant different usage
12 characteristics. Utilities may create a separate residential class or sub-
13 class for DG customers with their own rate design, which appropriately
14 recovers the fixed costs of providing service to residential private DG
15 customers, or a utility may continue to serve residential private DG
16 customers within an existing residential rate class if the utility determines
17 there are too few DG customers to justify a separate residential private DG
18 class or sub-class or determines that other justification exists to retain
19 those customers in the existing rate class. A separate rate class for DG
20 customers is not meant to punish those customers, rather such a rate class
21 would serve to provide clarity for both utilities and customers.

22
23 a. Specific to Westar, Westar's Distributed Generation Residential
24 Rate Schedule implemented in Westar's last rate case shall remain in place
25 and effective for all residential customers installing distributed generation
26 on or after October 28, 2015, and shall be treated as a separate class for
27 purposes of future class cost of service studies and ratemaking generally.

28
29 2. The current two-part residential rate design is problematic for
30 utilities and residential private DG customers.

31
32 3. The following rate design options are appropriate for residential
33 private DG customers to better recover the costs of providing service to
34 that class or sub-class of customers:

35
36 a. A cost of service based three-part rate consisting of a customer
37 charge, demand charge, and energy charge;

1
2 b. A grid charge based upon either the DG output or nameplate
3 rating; and
4

5 c. A cost of service-based customer charge that is tiered based upon a
6 customer's capacity requirements.
7

8 The above list is not meant to preclude a utility from proposing other
9 appropriate rate designs within that individual utility's rate case
10 proceeding.
11

12 4. A customer education program must be implemented whenever
13 new residential private DG rate structures are ordered, and that program
14 should be completed as soon as practical after the Commission approves a
15 new rate design.
16

17 5. Rates for private residential DG customers should be cost-based
18 and any unquantifiable value of solar resource approach should not be
19 considered when setting rates. A class cost of service study provides
20 sufficient support for design of a residential private DG tariff (as identified
21 above in paragraph [3]), and no further study is necessary for the purpose
22 of this docket.
23

24 6. To the extent that a value of resource study (i.e. cost-benefit
25 analysis) is ordered by the Commission to be completed in a future
26 proceeding as a consideration in the ratemaking process for DG
27 customers, the Settling Parties agree that such a study should be utility-
28 specific, and (i) occur within a utility-specific rate case docket; and (ii)
29 include only quantifiable market-based costs and benefits to the utility.
30

31 7. Present DG rate design policy is best determined in this docket
32 (instead of delaying further) in order to provide certainty to all parties for
33 the benefit of the orderly development of the private DG market in
34 Kansas. However, electric utilities that do not currently have DG tariffs
35 shall have the option to propose DG tariffs consistent with the principles
36 established in this general investigation in subsequent general rate case
37 filings for approval by the Commission.
38

39 8. Any DG-specific rate design implemented subsequent to this
40 proceeding to serve residential private DG customers would apply to those
41 customers adding DG systems on or after the effective date of those
42 tariffs. Customers with distributed DG systems implemented and
43 operating prior to that date and served by other rate designs will be
44 allowed to remain on those preexisting rates until January 1, 2030 to the
45 extent permitted by Kansas law. On and after January 1, 2030, all

1 distributed generation customers will be subject to the then current
2 residential DG rate design.

3
4 a. Specific to Westar, the settlement approved by the Commission in
5 Westar's last general rate case regarding the creation of the "Residential
6 Standard Distributed Generation" tariff is still effective and customers
7 who added DG on or after October 28, 2015, will be subject to the rate
8 design change that occurs in future rate case dockets based on the policy
9 established in this docket.

10
11 9. This Stipulation, if approved by the Commission in this Docket,
12 provides guidance to the cooperatives that have elected to be self-
13 regulated pursuant to K.S.A. 66-104d, but such self-regulated cooperatives
14 shall not be bound by the Stipulation.

15
16 **Q. Are any of the terms of the S&A contrary to positions espoused in your**
17 **Initial or Reply Comments?**

18 A. No. While the terms of the S&A result in more broad, or less proscriptive
19 requirements for DG customers, none of the terms explicitly contradict my original
20 recommendations. The terms still conform to Staff's core rate design principles, such as
21 cost-based rates with minimized inter-class cross-subsidization articulated in my initial
22 and reply comments and in testimony I've filed in other docket.

23 **The Commission's Standard of Review for Settlement Agreements**

24 **Q. Has the Commission previously addressed the standards it uses to review**
25 **Settlement Agreements?**

26 A. Yes. The Commission's Order in Docket No. 08-ATMG-280-RTS discusses
27 these five factors, or standards, and multiple agreements have been reviewed by the
28 Commission using the five factors since that Order.¹ These five factors are as follows:

29 1. Whether there was an opportunity for the opposing party to be heard on their
30 reasons for opposition to the stipulation and agreement;

¹ Order Approving Contested Settlement Agreement, p. 5, Docket No. 08-ATMG-280-RTS (May 12, 2008).

1 2. Whether the stipulation and agreement is supported by substantial competent
2 evidence in the record as a whole;

3 3. Whether the stipulation and agreement conforms to applicable law;

4 4. Whether the stipulation and agreement results in just and reasonable rates; and

5 5. Whether the results of the stipulation and agreement are in the public interest,
6 including the interest of customers represented by the parties not consenting to
7 the agreement.

8 Each of these five factors is discussed individually below.

9 **Q. Please address whether each party had an opportunity to be heard on its**
10 **reasons for opposing the S&A.**

11 A. On July 12, 2016, the Commission issued an Order opening this general
12 investigation docket in order to examine various issues surrounding rate structure for
13 Kansas distributed generation (DG) customers.² The Commission ordered the parties to
14 the docket “to file comments on how the general investigation should proceed to
15 minimize the need for extensive comment periods.”³ These comments were to be filed
16 within 45 days of the date of the Order Opening General Investigation.⁴

17 Following receipt of comments, the Commission issued an Order Setting
18 Procedural Schedule on February 16, 2017. The Order Setting Procedural Schedule
19 required parties to file initial comments with supporting affidavits by March 17, 2017,
20 and reply comments with supporting affidavits by May 5, 2017. The Order Setting
21 Procedural Schedule also established two roundtables for discussions among the parties,
22 which were held on March 30, 2017, and April 13, 2017.

² Order Opening General Investigation, Ordering Clause A (July 12, 2016).

³ Order Opening General Investigation, Ordering Clause D (July 12, 2016).

⁴ *Id.*

1 The following parties filed Initial Comments: Staff, CURB, Westar, KCP&L,
2 Empire, Midwest Energy, Southern Pioneer, KEC, Sunflower and Mid-Kansas, Cromwell
3 Environmental, Inc. (Cromwell), Brightergy, United Wind, Inc. (United Wind), and
4 Climate + Energy Project (CEP).

5 The following parties filed Reply comments: Staff, CURB, Westar, KCP&L,
6 Empire, Midwest Energy, Southern Pioneer, KEC, Cromwell, Brightergy, CEP, IBEW
7 304.

8 On June 5, 2017, the parties met in person and by phone to discuss potential
9 settlement of the various issues in the docket. Detailed conversations and negotiations
10 continued until June 16, 2017. A large number of the parties were able to reach
11 agreement on how they believe the Commission should address the issues in this generic
12 docket. That agreement resulted in this non-unanimous S&A.

13 **Q. Please address whether the S&A is supported by substantial competent**
14 **evidence in the record as a whole.**

15 A. The S&A is supported by substantial competent evidence in the record as a whole.
16 The S&A is supported by initial comments and reply comments filed in the docket.
17 These filed positions constitute the body of evidence that the Commission will rely on to
18 make a determination of the issues presented by this case. The Settling Parties also relied
19 on this evidence in negotiations and eventually arrived at an agreed upon resolution of the
20 issues. It is Staff's position that the terms of this S&A, taken as a whole, are comparable
21 with what one could expect if the case were to be fully litigated.

1 **Q. Please address whether the S&A conforms to applicable law.**

2 A. I am not an attorney. However, it is my understanding that the S&A does follow
3 precedent for similar settlements in the past that have been executed in an effort to
4 conform to applicable laws. Staff negotiated this settlement consistent with its
5 understanding of Staff's legally authorized role in settling utility regulatory matters and
6 Staff's understanding of applicable laws, regulations, and controlling authority. All
7 attempts were made to ensure that this S&A conforms to applicable laws and is presented
8 in a fashion to allow the Commission to properly approve the S&A. Staff counsel will be
9 available at the hearing to address any specific issues or questions from the
10 Commissioners regarding the S&A's conformity to applicable laws.

11 **Q. Does Staff believe that the S&A will result in just and reasonable rates?**

12 A. Rates are not being set in this docket. Therefore, this factor is not applicable here.
13 However, the purpose of this generic investigation was to examine issues surrounding
14 distributed generation rate design and does not affect the rate structure for non-DG
15 customers. Staff believes the resulting policy guidance from this S&A will instruct just
16 and reasonable rates in future rate proceedings.

17 **Q. Does Staff believe the results of the S&A are in the public interest?**

18 A. Yes. There were multiple interests represented by the parties involved in the
19 negotiations, with CURB representing the interests of residential and small general
20 service ratepayers,⁵ Westar, KCP&L, Sunflower, Mid-Kansas, Southern Pioneer, KEC,
21 Midwest Energy, Empire, Cromwell and United Wind representing the interest of their
22 management and shareholders, IBEW 304 and C&E representing the interest of its

⁵ While CURB is not a signatory to the S&A, as their initial and reply comments indicates, they are in support of many provisions of the S&A, further evidence the public interest standard is met.

1 members, Brightergy representing the interest of its management and owners, and Staff
2 attempting to balance each of those interests while representing the interests of the public
3 generally.

4 Because some of these varied interests were able to collaborate and present a
5 reasonable resolution of most of the issues in this case, the evidentiary hearing will be
6 less extensive than it would be without this S&A. Therefore, if this S&A is approved, the
7 Parties would avoid some of the costly and time-consuming process of a fully-litigated
8 hearing. It will further the public interest to reduce these costs if possible and this S&A
9 accomplishes that.

10 III. RECOMMENDATION

11 **Q. Should the Commission accept the S&A as a reasonable resolution of the**
12 **issues in this docket?**

13 A. Yes. All parties to the docket had an opportunity to express their reasons for
14 opposing the S&A. Further, the S&A represents a reasonable resolution of the issues in
15 this docket, is supported by substantial competent evidence in the record, conforms to
16 applicable law, will provide guidance for designing just and reasonable rates in future
17 rate proceedings, and is in the public interest. Therefore, the Commission should accept
18 the S&A as a reasonable resolution of the issues in this docket.

19 **Q. Does this conclude your testimony?**

20 A. Yes, thank you.

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

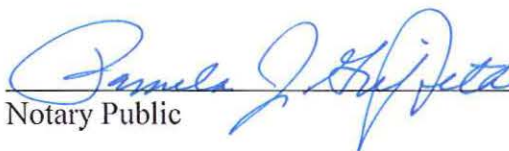
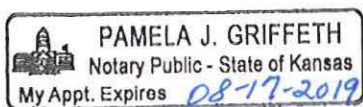
VERIFICATION

Robert H. Glass Ph.D. being duly sworn upon his oath deposes and says that he is Chief - Economics and Rates for the State Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Testimony in Support of Non-Unanimous Stipulation and Agreement* and 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 20th day of June, 2017.


Notary Public

My Appointment Expires: August 17, 2019

CERTIFICATE OF SERVICE

16-GIME-403-GIE

I, the undersigned, certify that a true and correct copy of the above and foregoing Testimony in Support of Non-Unanimous Stipulation and Agreement was served by electronic service on this 20th day of June, 2017, to the following:

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