

BEFORE THE CORPORATION COMMISSION
OF THE STATE OF KANSAS

IN THE MATTER OF THE JOINT]
APPLICATION OF EVERGY KANSAS]
CENTRAL, INC. AND EVERGY KANSAS] KCC DOCKET NO. 18-WSEE-328-RTS
SOUTH, INC. TO MAKE CERTAIN CHANGES]
IN THEIR CHARGES FOR ELECTRIC SERVICE]

DIRECT TESTIMONY ON REMAND OF

BRIAN KALCIC

ON BEHALF OF

THE CITIZENS' UTILITY RATEPAYER BOARD

November 13, 2020

1 **Q. Please state your name and business address.**

2 A. Brian Kalcic, 225 S. Meramec Avenue, Suite 720, St. Louis, Missouri 63105.

3

4 **Q. What is your occupation?**

5 A. I am an economist and consultant in the field of public utility regulation, and principal
6 of Excel Consulting. My qualifications are described in the Appendix to this testimony.

7

8 **Q. On whose behalf are you testifying in this case?**

9 A. I am testifying on behalf of the Citizens' Utility Ratepayer Board ("CURB").

10

11 **Q. Have you previously testified on behalf of CURB in Docket No. 18-WSEE-328-**
12 **RTS?**

13 A. Yes, I have.

14

15 **Q. What is the subject of your testimony?**

16 A. I will discuss CURB's position with respect to the alternative residential distributed
17 generation ("RS-DG") rate design proposals sponsored by Evergy Kansas Central, Inc.
18 and Evergy Kansas South, Inc. (collectively "Evergy" or the "Company").

19

20 **Q. Please summarize your primary recommendations.**

21 A. Based upon my review of Evergy's direct testimony, comments and interrogatory
22 responses, I recommend that the Kansas Corporation Commission ("KCC" or
23 "Commission"):

- 1 • reject the Company’s primary RS-DG rate design proposal, which would
2 implement a monthly residential grid access fee of \$3.00 per kW of
3 installed DG capacity, applicable to all residential customers;
- 4 • reject the Company’s alternative rate design proposal, which would
5 include a minimum monthly bill provision in the amount of \$35.00 in all
6 of its residential rate schedules; and
- 7 • adopt CURB’s recommended interim rate design for Evergy’s RS-DG
8 customers, which would (i) cancel the Company’s Residential Standard
9 Distributed Generation tariff, (ii) move all RS-DG customers back to the
10 Company’s Residential Standard Service two-part rate schedule, and (iii)
11 permit Evergy to track foregone revenues that would otherwise be
12 obtained from implementing a monthly GAF of \$3.00 per kW of
13 installed DG capacity in a regulatory asset, for potential recovery in
14 Evergy’s next general rate case.

15

16 **Residential Grid Access Fee (“GAF”)**

17

18 **Q. Please describe the Company’s primary RS-DG rate design proposal in this**
19 **proceeding.**

20 A. In place of the Company’s three-part residential DG demand rate, Evergy proposes to
21 implement a monthly residential GAF of \$3.00 per kW of installed DG capacity,
22 applicable to all residential customers. The total grid access *charge* appearing on a
23 residential customer’s monthly bill would be determined by multiplying the customer’s
24 installed DG capacity in kW by the GAF. Accordingly, residential customers without

1 installed generation, i.e., customers having installed DG capacity of zero kW, would
2 pay a monthly grid access charge of \$0.00.

3 Upon approval of the GAF, Evergy would no longer serve RS-DG customers
4 under its grandfathered DG rates (where eligible DG customers are permitted to take
5 service on the Company's Residential Standard Service two-part rate schedule) or its
6 three-part residential DG demand rate.¹ Instead, all RS-DG customers would take
7 service on the revised Residential Standard Distributed Generation rate schedule shown
8 in Schedule BDL-1. Finally, the changes in revenues generated by the GAF would be
9 recorded in a deferral account and considered in the Company's next general rate
10 proceeding.

11
12 **Q. What would be the impact of the GAF on a RS-DG customer's monthly bill?**

13 A. The actual bill impact would of course vary with the amount of installed DG capacity.
14 However, Evergy estimates that the average bill impact across all RS-DG customers
15 would be an additional charge of \$20.56 per month or \$246.69 per year.

16
17 **Q. Does Evergy claim that implementing its proposed monthly GAF of \$3.00 per kW
18 of installed DG capacity would allow the Company to recover 100% of its cost to
19 serve RS-DG customers?**

20 A. No. According to the Company, it would be necessary to set the GAF at \$6.50 per kW
21 of installed DG capacity in order to recover 100% of Evergy's cost to serve RS-DG

¹ Per the Company's response to CURB DR 59, Evergy has 732 DG customers taking service on the Residential Standard Service two-part rate schedule and 370 customers taking service on the three-part residential DG demand rate.

1 customers.² However, Evergy proposes to mitigate customer impacts by limiting the
2 GAF to \$3.00 per kW of installed DG capacity at this time.

3
4 **Q. Does Evergy consider its GAF proposal to be discriminatory, in the sense that it**
5 **would employ a customer's DG status as the basis for charging an RS-DG**
6 **customer more for the same service provided to non-DG customers?**

7 A. No. Evergy maintains that RS-DG and RS customers “are not similarly situated” and
8 therefore the service provided to RS-DG customers by Evergy is not the same service
9 provided to RS customers.³ However, even if parties disagree as to whether or not RS-
10 DG customers receive a unique service from the Company, Evergy argues that since the
11 GAF would apply equally to all residential customers, the GAF should not be regarded
12 as discriminatory or in violation of K.S.A. 66-117d.⁴

13
14 **Q. Do you agree that Evergy's GAF proposal would not be discriminatory toward**
15 **RS-DG customers?**

16 A. I am not an attorney so I cannot offer a legal opinion regarding whether a GAF would
17 be found in violation of K.S.A. 66-117d. However, I would direct the Commission to
18 CURB's Reply Comments to Evergy's Initial Comments, which include a discussion of
19 the risks inherent in a Kansas Supreme Court review of a GAF, should the Commission
20 approve Evergy's GAF proposal.

21

² See the Direct Testimony on Remand of Mr. Lutz, at page 8.

³ See Evergy's Reply Comments at pages 4-9.

⁴ See Evergy's Reply Comments at page 10.

1 **Q. Is CURB in favor of implementing a GAF for Evergy's RS-DG customers at this**
2 **time?**

3 A. No. Consistent with CURB's Initial Comments and Reply Comments, CURB
4 recommends that the Commission (1) cancel the Company's Residential Standard
5 Distributed Generation tariff, (2) move all RS-DG customers back to the Residential
6 Standard Service two-part rate schedule, and (3) permit Evergy to track foregone
7 revenues that would otherwise be obtained from implementing a monthly GAF of \$3.00
8 per kW of installed DG capacity in a regulatory asset, for potential recovery in Evergy's
9 next general rate case.

10 In CURB's view, such directives would provide a reasonable interim solution to
11 Evergy's RS-DG rate design issue, while permitting time for legislative action to
12 address conflicts in Kansas' existing statutes regarding DG ratemaking, and thereby
13 provide important guidance for regulators and stakeholders going forward.

14

15 **Q. Is the fact that CURB's recommended interim RS-DG rate design solution would**
16 **require deferral accounting measures a cause for concern?**

17 A. No, since both of Evergy's alternative RS-DG rate design proposals would also require
18 approval of deferral accounting treatments.

19

20 **Residential Minimum Bill**

21

22 **Q. Please describe the Company's alternative RS-DG rate design proposal if the**
23 **Commission should decline to approve Evergy's proposed GAF.**

1 A. As an alternative to a GAF, Evergy proposes to include a minimum monthly bill
2 provision, in the amount of \$35.00, in all of its residential rate schedules. In other
3 words, under Evergy's minimum bill proposal, *all* residential customers would pay at
4 least \$35.00 per month for electricity, whether or not they had any installed DG
5 capacity, or used any electricity in a given month.

6 Since approval of Evergy's minimum bill proposal would generate residential
7 revenues above the level approved in the Company's last rate proceeding, Evergy also
8 proposes to record such additional revenues in a deferral account, which would be
9 considered in the Company's next general rate proceeding.

10

11 **Q. What would be the impact of the minimum bill provision on residential bills?**

12 A. Under the Company's existing Residential Standard Service rate schedule, a monthly
13 bill of \$35.00 would cover the Basic Service Fee of \$14.50 plus usage of approximately
14 278 kWh. Under the Company's minimum bill proposal, a customer using less than
15 278 kWh would be billed \$35.00, while customers using in excess of 278 kWh per
16 month would see no change in their monthly bill (since it would exceed the minimum).
17 Therefore, Evergy's minimum bill proposal would only impact lower usage customers,
18 with the actual impact dependent upon the level of monthly usage. The lower a
19 customer's usage (below 278 kWh), the greater the customer impact.

20

21 **Q. What is the average monthly usage of all of the Company's residential customers?**

22 A. 853.5 kWh.⁵

⁵ See the Direct Testimony on Remand of Mr. Lutz, at pages 11-12.

1 **Q. Would approval of Evergy's minimum bill proposal permit the Company to**
2 **recover 100% of its cost to serve RS-DG customers?**

3 A. According to the Company, it would not. Evergy claims that it incurs total costs of
4 approximately \$77.00 per month to serve RS-DG customers.⁶ However, rather than
5 implement a minimum bill of \$77.00 per month, Evergy proposes to mitigate customer
6 impacts by limiting the minimum bill amount to \$35.00 at this time.

7
8 **Q. As you previously noted, the "breakeven" level of monthly usage with a minimum**
9 **bill of \$35.00 is 278 kWh. What would the breakeven level of usage be if the**
10 **minimum bill were to be set at \$77.00 per month?**

11 A. Under that scenario, the breakeven level of monthly usage would be approximately 850
12 kWh.⁷

13
14 **Q. Does it make sense that the breakeven level of monthly usage with a minimum bill**
15 **of \$77.00 would essentially equal the average monthly usage of all residential**
16 **customers?**

17 A. Yes. If the Company's claimed average monthly cost of serving an RS-DG customer
18 (\$77.00) was based on the average cost of serving all residential customers, then the
19 breakeven level of consumption would be based on the cost to serve an "average
20 residential customer," who by definition would have monthly usage equal to the
21 average usage of all residential customers.

⁶ See the Direct Testimony on Remand of Mr. Lutz, at page 11.

⁷ See the Company's response to CURB DR 64.

1 **Q. What conclusions follow from the above discussion regarding the Company's**
2 **alternative proposal to include a minimum bill provision applicable to all**
3 **residential customers in order to recover additional fixed costs from RS-DG**
4 **customers?**

5 A. Put simply, if the Commission were to approve Evergy's alternative minimum bill
6 proposal, when fully implemented, *all residential customers with monthly usage less*
7 *than the class average would pay more for electricity than they do today.*

8
9 **Q. Would such an outcome be reasonable?**

10 A. Certainly not. To the extent that lower-income customers consume less than 850 kWh
11 per month, the proposed rate design would increase the monthly bills of those
12 customers that can least afford higher utility bills. At the same time, customer
13 acceptance of the new rate design among those using less than the class average would
14 be problematic, to say the least, as customers struggled to understand why their monthly
15 bills should have increased when they were not using any more energy than usual.

16 Finally, CURB notes that those customers using less than 850 kWh per month
17 would no longer have a reason to conserve energy (i.e., use less than 850 kWh) since
18 their monthly bill would be \$77.00 whether they used 400 kWh or 850 kWh in a given
19 month.

20

21 **Q. Would the Company's alternative minimum bill rate design also affect the**
22 **conservation incentives of those residential customers that consume more than 850**
23 **kWh each month?**

1 A. Yes. Rate design is a zero-sum game. If residential customers using less than 850 kWh
2 each month would pay more under the new rate structure, it follows that residential
3 customers using in excess of 850 kWh would pay less – in the form of a lower energy
4 charge for usage in excess of 900 kWh per month (i.e., usage falling in Evergy’s third
5 residential rate block). A lower third block rate would lengthen the payback period
6 associated with energy saving investments, and thereby reduce the incentive for such
7 customers to conserve energy.

8

9 **Q. Should the KCC adopt the Company’s alternative rate design proposal to include**
10 **a minimum monthly bill provision of \$35.00 in all of its residential rate schedules?**

11 A. No. For all the above reasons, CURB recommends that the Commission reject it.

12

13 **Q. Does this conclude your direct testimony on remand?**

14 A. Yes.

APPENDIX

Qualifications of Brian Kalcic

Mr. Kalcic graduated from Benedictine University with a Bachelor of Arts degree in Economics in December 1974. In May 1977 he received a Master of Arts degree in Economics from Washington University, St. Louis. In addition, he has completed all course requirements at Washington University for a Ph.D. in Economics.

From 1977 to 1982, Mr. Kalcic taught courses in economics at both Washington University and Webster University, including Microeconomic and Macroeconomic Theory, Labor Economics and Public Finance.

During 1980 and 1981, Mr. Kalcic was a consultant to the Equal Employment Opportunity Commission, St. Louis District Office. His responsibilities included data collection and organization, statistical analysis and trial testimony.

From 1982 to 1996, Mr. Kalcic was employed by the firm of Cook, Eisdorfer & Associates, Inc. During that time, he participated in the analysis of electric, gas and water utility rate case filings. His primary responsibilities included cost-of-service and economic analysis, model building, and statistical analysis.

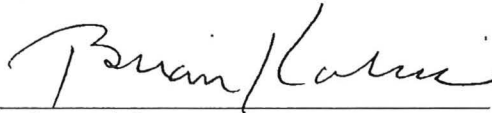
In March 1996, Mr. Kalcic founded Excel Consulting, a consulting practice that offers business and regulatory analysis.

Mr. Kalcic has previously testified before the state regulatory commissions of Delaware, Indiana, Kansas, Kentucky, Maine, Massachusetts, Minnesota, Missouri, New Jersey, New York, Ohio, Oregon, Pennsylvania, and Texas, and also before the Bonneville Power Administration.

VERIFICATION

STATE OF MISSOURI)
) ss:
COUNTY OF ST. LOUIS)

I, Brian Kalcic, of lawful age and being first duly sworn upon my oath, state that I am a consultant for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing testimony and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.



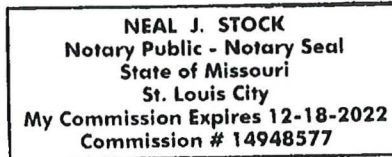
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SUBSCRIBED AND SWORN to before me this 12th day of Nov., 2020.



Notary Public

My Commission expires: 12/18/2022



CERTIFICATE OF SERVICE

18-WSEE-328-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 13th day of November, 2020, to the following:

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