

**GMO-246**

Exhibit No.:  
Issues: RESRAM  
Proposition C  
Witness: Michael E. Taylor  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Surrebuttal Testimony  
File No.: ER-2010-0356  
Date Testimony Prepared: January 12, 2011

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY OPERATIONS DIVISION**

**SURREBUTTAL TESTIMONY**

**OF**

**MICHAEL E. TAYLOR**

**KCP&L GREATER MISSOURI OPERATIONS COMPANY**

**FILE NO. ER-2010-0356**

*Jefferson City, Missouri  
January 2011*

*Staff Exhibit No. GMO-246  
Date 1/18/11 Reporter LMB  
File No. ER-2010-0356*

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of )  
KCP&L Greater Missouri Operations )  
Company for Approval to Make Certain )  
Changes in its Charges for Electric )  
Service )

File No.: ER-2010-0356


**AFFIDAVIT OF MICHAEL E. TAYLOR**

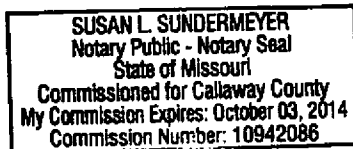
STATE OF MISSOURI    )  
                                  ) ss  
COUNTY OF COLE     )

Michael E. Taylor, of lawful age, on his oath states: that he has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of 2 pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

  
Michael E. Taylor

Subscribed and sworn to before me this 12<sup>th</sup> day of January, 2011.

  
Notary Public



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**SURREBUTTAL TESTIMONY**

**OF**

**MICHAEL E. TAYLOR**

**KCP&L GREATER MISSOURI OPERATIONS COMPANY**

**FILE NO. ER-2010-0356**

Q. Please state your name and business address.

A. Michael E. Taylor, P.O. Box 360, Jefferson City, Missouri, 65102.

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

A. I am employed by the Missouri Public Service Commission (Commission) as a Utility Engineering Specialist III in the Energy Department of the Utility Operations Division.

Q. Are you the same Michael E. Taylor who previously filed Rebuttal Testimony in this case?

A. Yes, I am.

Q. What is the purpose of your Surrebuttal Testimony?

A. I am responding to the Rebuttal Testimony of KCP&L Greater Missouri Operations Company (GMO) witness Tim M. Rush regarding an expense associated with the "renewable energy resources" requirement found in the Missouri Renewable Energy Standard (RES), Section 393.1030, RSMo (Cum. Supp. 2009).

Q. What RES-related expense did Mr. Rush address in his Rebuttal Testimony?

A. On page 13, lines 15 through 17, Mr. Rush states that GMO has entered into a solar energy purchased power agreement that qualifies as a renewable energy resource.

Q. Does GMO have any solar energy purchased power contracts?

Surrebuttal Testimony of  
Michael E. Taylor

1           A.     No. GMO responded to Staff Data Request No. 0340 on December 13, 2010,  
2 stating that it did not have a solar energy purchased power contract. Staff submitted a follow-  
3 up Data Request No. 0352 to GMO on December 21, 2010, seeking to reconcile Mr. Rush's  
4 Rebuttal Testimony and the Company's response to Data Request No. 0340. The response to  
5 Data Request No. 0352 confirmed that GMO does not have any solar energy purchased power  
6 contracts.

7           Q.     On page 13, lines 17 and 18, of his Rebuttal Testimony Mr. Rush also states  
8 that Staff recognized the solar energy purchased power agreement in its fuel run in this case.  
9 Do you agree with that statement?

10          A.     No. GMO responded to Staff Data Request No. 0182 on September 9, 2010,  
11 stating that it did not have a solar energy purchased power contract. Therefore, Staff did not  
12 utilize a solar energy purchased power agreement in its fuel run in this case.

13          Q.     Does this conclude your Surrebuttal Testimony?

14          A.     Yes.