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	Exhibit No.: Witness: Type of Exhibit Issues: Sponsoring Pa Case No.:	Cost of Service	
BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI			
In the Matter of the Application of Kansas City Power & Light Compa for Approval to Make Certain Chan in its Charges for Electric Service of Begin the Implementation of Its Regulatory Plan	ges)	ase No. ER-2006-0314	
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Septemb	er 15, 2006		
BRUBAKER & ST. LOUIS. M	Associates, Inc. 10 63 141-2000		
Proje	ct 8627		
		Wal-Mart Exhibit No	<u>,902</u>
		Case No(s). <u>CC</u> - 2 Date_\0 -\b -\b F	001-031-1
		Date <u>10-16-06</u> R	iptr <u> </u>

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas City Power & Light Company for Approval to Make Certain Changes in its Charges for Electric Service to Begin the Implementation of Its Regulatory Plan

Case No. ER-2006-0314

STATE OF MISSOURI

COUNTY OF ST. LOUIS

SS

Affidavit of James T. Selecky

James T. Selecky, being first duly sworn, on his oath states:

1. My name is James T. Selecky. I am a consultant with Brubaker & Associates, Inc., having its principal place of business at 1215 Fern Ridge Parkway, Suite 208, St. Louis, Missouri 63141-2000. We have been retained by Wal-Mart Stores East, LP in this proceeding on their behalf.

2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony on cost of service issues which was prepared in written form for introduction into evidence in Missouri Public Service Commission Case No. ER-2006-0314.

3. I hereby swear and affirm that the testimony is true and correct and that it shows the matters and things it purports to show.

0 C es T. Selecky Jai

Subscribed and sworn to before this 15th day of September 2006.

CAROL SCHULZ
Notary Public - Notary Scal
STATE OF MISSOURI
St. Louis County
My Commission Expires: Feb. 26, 2008

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My Commission Expires February 26, 2008.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Kansas City Power & Light Company for Approval to Make Certain Changes In its Charges for Electric Service to Begin the Implementation of Its Regulatory Plan

Case No. ER-2006-0314

Rebuttal Testimony of James T. Selecky

- 1 Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
- 2 A James T. Selecky; 1215 Fern Ridge Parkway, Suite 208; St. Louis, MO 63141-2000.
- 3 Q ARE YOU THE SAME JAMES T. SELECKY WHO HAS PREVIOUSLY FILED

4 TESTIMONY IN THIS PROCEEDING?

- 5 A Yes. I have previously filed direct testimony on cost of service and revenue allocation
 6 issues.
- 7 Q ARE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE OUTLINED IN
- 8 THAT PRIOR TESTIMONY?

9 A Yes. This information is included in Appendix A to my direct testimony on cost of
 10 service and revenue allocation issues

- 11 Q BASED ON YOUR REVIEW OF THE OTHER INTERVENING PARTIES' DIRECT
- 12 TESTIMONY IN THIS PROCEEDING ON COST OF SERVICE, DO YOU HAVE ANY
- 13 REVISIONS, ADJUSTMENTS OR ADDITIONS TO YOUR DIRECT TESTIMONY?
- 14 A No. I continue to support the use of the cost of service studies that allocate the fixed

James T. Selecky Page 1

BRUBAKER & ASSOCIATES, INC.

production cost either on the coincident peak method or the average and excess demand method.

Q DO YOU HAVE ANY COMMENTS TO MAKE REGARDING THE MPSC STAFF
WITNESS JANICE PYATTE'S TESTIMONY ON COST OF SERVICE ISSUES?
A Yes. I oppose Ms. Pyatte's method of allocating production and transmission cost to
the classes using a version of the average and peak method. Because I have
addressed this issue in my direct testimony, I will not repeat any of the arguments.

8 Q DO YOU HAVE ANY COMMENTS ON THE OFFICE OF PUBLIC COUNCIL 9 WITNESS BARBARA MEISENHEIMER'S DIRECT TESTIMONY ON COST OF 10 SERVICE?

11 A Yes. One of the methods Ms Melsenheimer proposes includes the allocation of 12 production costs on a version of an average and peak demand allocator. As 13 previously indicated, my opposition to utilizing the average and peak demand 14 allocator is discussed in my direct testimony.

15 The second method allocates the production plant using a time-of-use 16 allocator (TOU). The results of this allocation appear to overallocate costs on energy 17 and do not adequately rely on the summer peaks that drive KCPL's need for 18 additional capacity. Accordingly, I oppose this allocation method for production plant 19 because it does not properly reflect cost causation.

20 Q DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY AT THIS TIME?

21 A Yes, it does.

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