

GMO-214

Exhibit No.:
Issues: Engineering Review
Witness: David W. Elliott
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

DAVID W. ELLIOTT

KCP&L GREATER MISSOURI OPERATIONS COMPANY

FILE NO. ER-2010-0356

*Jefferson City, Missouri
January 2011*

Staff Exhibit No. GMO-214
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 DAVID W. ELLIOTT

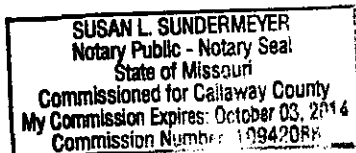
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

David W. Elliott, 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.



David W. Elliott

Subscribed and sworn to before me this 12th day of January, 2011.





Notary Public

1 | **SURREBUTTAL TESTIMONY**

2 | **OF**

3 | **DAVID W. ELLIOTT**

4 | **KCP&L GREATER MISSOURI OPERATIONS COMPANY**

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

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12 | Q. Please state your name and business address.

13 | A. David W. Elliott, 200 Madison Street, Jefferson City, Missouri 65101.

14 | Q. Are you the same David W. Elliott employed by the Missouri Public Service
15 | Commission (Commission) that contributed to Staff's Construction Audit and Prudence
16 | Review of Iatan Construction Project for Costs Reported as of June 30, 2010, filed on
17 | November 4, 2010 in this case?

18 | A. Yes.

19 | Q. What is the purpose of your surrebuttal testimony?

20 | A. The purpose of my surrebuttal testimony is to address statements made by
21 | KCP&L Greater Missouri Operations Company witness Chris B. Giles in his rebuttal
22 | testimony in this case related to the Iatan Construction Project.

23 | Q. Mr. Giles makes the following statement, "However, I note that Staff's Mr.
24 | David Elliott has had no such difficulties identifying or explaining the cost variances over the
25 | Iatan project CBEs [Control Budget Estimates]." (Giles rebuttal page 12, lines 7 and 8) Do
26 | you agree with this statement?

27 | A. No. I did not identify or explain cost variances over the Iatan project CBEs. I
28 | reviewed the approved change orders over \$50,000 to understand the reason for the change
29 | order and determine if there were any engineering issues or concerns with the change order. I

Surrebuttal Testimony of
David W. Elliott

1 explain this review on page 28 in Staff's Construction Audit and Prudence Review of Iatan
2 Construction Project for Costs Reported as of June 30, 2010, filed on November 4, 2010:

3 Engineering Staff review construction project change orders associated
4 with the project for the following:

- 5 • To understand the reason for the change at the point in time when the
6 change order was issued;
- 7 • To determine whether the change corrected an engineering-related
8 problem, resulted in a better design, or improved the operation or
9 construction of the plant; and
- 10 • To determine whether the change resulted in a safety concern, caused
11 unnecessary construction, or caused unnecessary duplication of
12 facilities or work.

13 Q. Mr. Giles makes the following statement, "Mr. Elliott's analysis clearly shows
14 that cost overruns to the Iatan Projects's CBEs are both identified and explained." (Giles
15 rebuttal page 15, lines 10 and 11) Do you agree with that statement?

16 A. No. I did not identify or explain cost overruns to the Iatan Project CBEs. I
17 reviewed the approved change orders over \$50,000 to understand the reason for the change
18 order and determine if there were any engineering issues or concerns with the change order. I
19 explain this review on page 28 of Staff's Construction Audit and Prudence Review of Iatan
20 Construction Project for Costs Reported as of June 30, 2010, filed on November 4, 2010, as
21 described in detail above.

22 Q. Are you the Staff member responsible to make the recommendation of what
23 cost overruns of the Iatan project should be allowed?

24 A. No. I am not.

25 Q. Does this conclude your surrebuttal testimony?

26 A. Yes, it does.