

Exhibit No. :
Witness : Michael K. Park
Type of Exhibit : Rebuttal Testimony
Party : City of Lee's Summit, Missouri
Case No. : ER-2010-0356
Issue: : Rate Design -- Effect of proposed rate increase on traffic signals, city street lights, leased and otherwise, and current negotiations for leased street lighting system.

CITY OF LEE'S SUMMIT, MISSOURI

Case No. ER-2010-0356

REBUTTAL TESTIMONY

OF

MICHAEL K. PARK

City of Lee's Summit, Missouri
December 17, 2010

Lee's Summit
Exhibit No. 4002
Date 2/15/11 Reporter MS
File No. ER-2010-0356

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

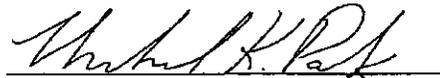
In the Matter of the Application of KCP&L Greater)
Missouri Operations Company for Approval to Make) Case No. ER-2010-0356
Certain Changes in its Charges for Electric Service)

Affidavit of Michael K. Park

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

I, Michael K. Park, of lawful age, being duly sworn, do hereby depose and state:

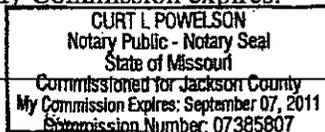
1. My name is Michael K. Park. I am City Traffic Engineer for the City of Lee's Summit. The City of Lee's Summit, Missouri is an intervenor herein.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my personal knowledge, information and belief.


Michael K. Park

Subscribed and sworn to before me, a Notary Public, this 17 day of December, 2010.


Notary Public

My Commission expires:



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

REBUTTAL TESTIMONY
OF
MICHAEL K. PARK
CASE NO. ER-2010-0356

Q. Please state your full name and business address.

A. My name is Michael K. Park. My business address is 220 SE Green Street, Lee's Summit, Missouri.

Q. Are you the same Michael K. Park who filed direct testimony in the case referenced above?

A. Yes.

Q. What is the purpose of your rebuttal testimony?

A. In general, I will be responding to that portion of the Staff Rate Design and CCOS Report related to MPS Lighting.

Q. The Staff Rate Design and CCOS Report references the Staff CCOS Study and suggests current revenue responsibility of the MPS Lighting customer is less than GMO's cost to serve it. Has sufficient documentation been provided to justify the percent increase in MPS Lighting rates shown in Table 1, Summary of Results of Staff's Revenue Neutral CCOS Study – MPS?

A. No, to my knowledge, there has been no discussion or validation of the requested MPS Lighting rates. Furthermore, as best as I can determine at this time, there has been no data presented to support a current MPS Lighting customer class revenue loss for GMO.

1 **Q. How has the MPS Lighting rate increase been related to costs recovered by**
2 **GMO?**

3 A. There is no available information that details the need for a rate increase in the
4 MPS Lighting class. In the absence of this information, there is no way to
5 determine if any cost recovery adjustment is appropriate and which components
6 of the tariff are applicable. It cannot be determined which individual parts that
7 make up the tariff (e.g. operating, maintenance, material, energy, distribution)
8 have valid reason for adjustment and to what extent each part should be adjusted.

9 **Q. Does the Staff Rate Design and CCOS Report change or affect the**
10 **recommendations you made in your direct testimony?**

11 A. No, my recommendations to the Commission are the same.

12 **Q. Does this conclude your Rebuttal Testimony?**

13 A. Yes, it does.