

**Public Counsel Workpapers for Scenarios B, C, and D of the UE Witness Voytas  
Direct Testimony 25 Year Revenue Requirement Analysis of the Proposed Transfer  
Option and the CTG Option**

1. Side by side comparison of Scenarios A (the revenue requirement analysis of the Metro East Transfer option and the combustion turbine generator (CTG) option described in the Direct Testimony of UE witness Richard Voytas), B, C, and D.
2. Ryan Kind's Scenario B workpapers. Scenario B is the same as Scenario A except that the \$7,647,620 upwards adjustment that Mr. Voytas made to UE's annual level of SO2 emission allowance sales in his Metro East Transfer option analysis has been reversed.
3. Ryan Kind's Scenario C workpapers. Scenario C is the same as Scenario A except that the cost per kW of installed combustion turbine generator (CTG) capacity in the CTG option analysis has been reduced from \$471/kW to \$450/kW.
4. Ryan Kind's Scenario D workpapers. Scenario D is the same as Scenario A except that (1) the \$7,647,620 upwards adjustment that Mr. Voytas made to UE's annual level of SO2 emission allowance sales in his Metro East Transfer option analysis has been reversed and (2) the cost per kW of installed combustion turbine generator (CTG) capacity in the CTG option has been reduced from \$471/kW to \$450/kW.

Note – The adjustments that Public Counsel witness Kind made to UE witness Voytas's revenue requirement analysis in Scenarios B, C, and D were made to correct some very obvious deficiencies in Mr. Voytas's analysis (Scenario A). Public Counsel witness Kind believes that the assumptions upon which Scenarios B, C, and D are based are much more reasonable than the assumptions made in Mr. Voytas's analysis. However, Public Counsel believes there are additional unreasonable assumptions made in Mr. Voytas's analysis, such as assuming in the Metro East transfer option analysis that the costs of compliance with environmental regulations will remain unchanged for the next 25 years, and these additional unreasonable assumptions were not addressed in Scenarios B, C, and D.

**FILED<sup>4</sup>**

APR 16 2004

Missouri Public  
Service Commission

Exhibit No. 88  
Case No(s). 90-2004-0108  
Date 4-8-04 Rptr YH

## Comparison of Metro East Transfer Option vs. Building New CTGs Under Four Scenarios

|  | 25 Year Present Value Rev. Reqmt. |            | Annualized Amount - 25 Year Analysis |            |
|--|-----------------------------------|------------|--------------------------------------|------------|
|  | Transfer Option                   | CTG Option | Transfer Option                      | CTG Option |
| <b>Scenario A - Voytas Direct</b><br>\$471/kW<br>With \$7,647,620 SO2 adjustment       | \$418.4                           | \$429.4    | \$43.1                               | \$45.5     |
| <b>Scenario B - OPC Calculations</b><br>\$471/kW<br>Without \$7,647,620 SO2 adjustment | \$425.3                           | \$429.4    | \$43.8                               | \$45.5     |
| <b>Scenario B - OPC Calculations</b><br>\$450/kW<br>With \$7,647,620 SO2 adjustment    | \$418.4                           | \$412.3    | \$43.1                               | \$43.7     |
| <b>Scenario D - OPC Calculations</b><br>\$450/kW<br>Without \$7,647,620 SO2 adjustment | \$425.3                           | \$412.3    | \$43.8                               | \$43.7     |

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