

KCP&L-245

Exhibit No.:
Issues: RESRAM
Proposition C
Witness: Michael E. Taylor
Sponsoring Party: MO PSC Staff
Type of Exhibit: Surrebuttal Testimony
Case No.: ER-2010-0355
Date Testimony Prepared: January 5, 2011

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

SURREBUTTAL TESTIMONY

OF

MICHAEL E. TAYLOR

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2010-0355

*Jefferson City, Missouri
January 2011*

Staff Exhibit No. KCP&L-245
Date 1/18/11 Reporter LMB
File No. ER-2010-0355

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SURREBUTTAL TESTIMONY

OF

MICHAEL E. TAYLOR

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2010-0355

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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 has 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 Kansas City Power & Light Company (KCPL) witness Tim M. Rush regarding an expense associated with meeting a "portfolio requirement" of the "renewable energy resources" requirement found in Section 393.1030, RSMo (Cum. Supp. 2009).

Q. What Renewable Energy Standard- (RES-) related expense did Mr. Rush address in his Rebuttal Testimony?

A. On page 4, lines 4 through 6, Mr. Rush states that KCPL has entered into a solar energy purchased power agreement that qualifies as a renewable energy resource.

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

Surrebuttal Testimony of
Michael E. Taylor

1 A. No. KCPL responded to Staff Data Request No. 0542 on December 13, 2010,
2 stating that it did not have a solar energy purchased power contract. Staff submitted follow-
3 up Data Request No. 0582 to KCPL on December 21, 2010, seeking to reconcile Mr. Rush's
4 Rebuttal Testimony and the Company's response to Data Request No. 0542. The response to
5 Data Request No. 0582 confirmed that KCPL does not have any solar energy purchased
6 power contracts.

7 Q. On page 4, lines 6 and 7, of his Rebuttal Testimony Mr. Rush also states that
8 Staff recognized the solar energy purchased power agreement in its fuel run in this case. Do
9 you agree with that statement?

10 A. No. KCPL responded to Staff Data Request No. 0229 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.