EXHIBIT

Exhibit No.:	
Issue(s):	Aquila Inc. Purchase Transition Costs
Witness:	Ted Robertson
Type of Exhibit:	True-Up Direct
Sponsoring Party:	Public Counsel
Case Number:	ER-2010-0356
Date Testimony Prepared:	February 22, 2011

TRUE-UP DIRECT TESTIMONY

OF

TED ROBERTSON

Submitted on Behalf of
the Office of the Public Counsel

KCP&L GREATER MISSOURI OPERATIONS COMPANY

Case No. ER-2010-0356

February 22, 2011

OPC Exhibit No GMO 406
Date 3/3/11 Reporter SMS
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 TED ROBERTSON

STATE OF MISSOURI)
) **ss**
COUNTY OF COLE)

Ted Robertson, of lawful age and being first duly sworn, deposes and states:

1. My name is Ted Robertson. I am a Chief Utility Accountant for the Office of the Public Counsel.

2. Attached hereto and made a part hereof for all purposes is my true-up direct testimony.

3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

Ted Robertson, C.P.A.
Chief Public Utility Accountant

Subscribed and sworn to me this 22nd day of February 2011.

NOTARY PUBLIC NOTARY SEAL STATE OF MISSOURI

JERENE A. BUCKMAN
My Commission Expires
August 23, 2013
Cole County
Commission #09754037

Jerene A. Buckman
Notary Public

My Commission expires August, 2013.

TRUE-UP DIRECT TESTIMONY
OF
TED ROBERTSON

KANSAS CITY POWER & LIGHT
GREATER MISSOURI OPERATIONS COMPANY
CASE NO. ER-2010-0356

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. Ted Robertson, PO Box 2230, Jefferson City, Missouri 65102-2230.

Q. ARE YOU THE SAME TED ROBERTSON THAT HAS PREVIOUSLY FILED DIRECT AND SURREBUTTAL TESTIMONY IN THIS CASE?

A. Yes.

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TRUE-UP DIRECT TESTIMONY?

A. I will provide the Public Counsel's position regarding the costs associated with the Company's true-up of the Aquila Inc. Purchase Transition Costs.

Q. WHAT IS THE ISSUE?

A. In its January 21, 2011 updated response to MPSC Staff Data Request No. 146 (Source: KCPL Case No. ER-2010-0355) Company identified its actual incurred transition costs as of December 31, 2010. Public Counsel has reviewed the Company's updated response to MPSC DR No. 146 and tied the amounts to the

associated entries in the Company's General Ledger update provided in its response to MPSC Staff Data Request No. 13. It is Public Counsel's recommendation that the actual costs identified in the updated responses (versus the blended actual plus projected costs originally identified by Company) receive Commission authorization as described in my instant case Direct Testimony.

Q. WHAT WAS PUBLIC COUNSEL'S POSITION AS STATED IN YOUR DIRECT TESTIMONY?

A. Public Counsel's position on this issue, as stated beginning on page 4, line 11, of my Direct Testimony, is:

> Pursuant to the Commission's authorization, Company has deferred transition costs and will amortize those costs over five years beginning with the effective date of the Commission's authorization in the instant case. However, while Public Counsel will not oppose what the Commission authorized for this issue, Public Counsel recommends that any future costs incurred subsequent to the test year and true-up period of the instant case not receive continued deferral authorization or amortization in any future rate cases.

Q. WHY DOES PUBLIC COUNSEL RECOMMEND THE DISCONTINUANCE OF THE DEFERRAL/AMORTIZATION AUTHORIZATION FOR ALLEGED FUTURE TRANSITION COSTS?

A. Public Counsel's recommendation is primarily based on the fact that sufficient time has already passed to effect the

> integration of Aquila Inc. into the operations of the current owner. In fact, it has been more than two years since the purchase of Aquila Inc. was authorized in Case No. EM-2007-0374 (the effective date of the Report and Order was July 11, 2008). Furthermore, it is my understanding, any additional transitional costs likely to be incurred may not be material and, given the dynamics of the Company's ongoing operations, may be considered costs which have been incurred due to changes caused by current operations of the total entity because there is no foolproof manner to determine whether the costs were incurred because of the purchase of Aquila Inc. or are simply a normal reaction to the operation of the utility as it currently exists.
>
> (Emphasis added by OPC)

Q. IS THE COMPANY IN AGREEMENT WITH PUBLIC COUNSEL'S POSITION THAT AQUILA INC. PURCHASE TRANSISTION COSTS INCURRED SUBSEQUENT TO THE TEST YEAR AND TRUE-UP PERIOD OF THE INSTANT CASE NOT RECEIVE CONTINUED DEFERRAL AUTHORIZATION OR AMORTIZATION IN ANY FUTURE RATE CASES?

A. Yes, it is my understanding that the Company is in agreement with Public Counsel regarding the elimination of the deferral authorization and will not request future recovery of any costs incurred subsequent to the true-up period of this case.

Q. DOES THIS CONCLUDE YOUR TRUE-UP DIRECT TESTIMONY?

A. Yes, it does.