

Exhibit No.: ~~GMO-259 NP~~
Issues: Allocation Factors
Witness: Erin L. Maloney
Sponsoring Party: MO PSC Staff
Type of Exhibit: True-Up Direct Testimony
File No.: ER-2010-0356
Date Testimony Prepared: February 22, 2011

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

TRUE-UP DIRECT TESTIMONY

OF

ERIN L. MALONEY

KCP&L GREATER MISSOURI OPERATIONS COMPANY

FILE NO. ER-2010-0356

*Jefferson City, Missouri
February 2011*

****Denotes Highly Confidential Information****

NP

GMO268 NP
Staff Exhibit No. ~~GMO259 NP~~
Date 3/3/11 Reporter SNB
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

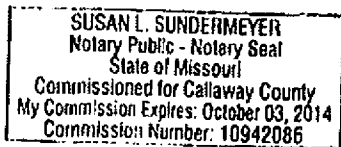
AFFIDAVIT OF ERIN L. MALONEY

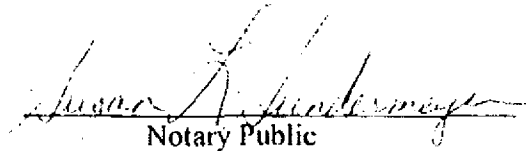
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Erin L. Maloney, of lawful age, on her oath states: that she has participated in the preparation of the following True-Up Direct Testimony in question and answer form, consisting of 2 pages of True-Up Direct Testimony to be presented in the above case, that the answers in the following True-Up Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true to the best of her knowledge and belief.


Erin L. Maloney

Subscribed and sworn to before me this 25th day of February, 2011.




Notary Public

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TRUE-UP DIRECT TESTIMONY

OF

ERIN L. MALONEY

KCP&L GREATER MISSOURI OPERATIONS COMPANY

FILE NO. ER-2010-0356

Q. Please state your name and business address.

A. My name is Erin L. Maloney. My business address is, P.O. Box 360, Jefferson City, Missouri, 65102.

Q. Are you the same Erin L. Maloney who contributed to the Missouri Public Service Commission Staff's (Staff) Cost of Service Report (Staff Report) filed on November 17, 2010?

A. Yes.

Q. What is the purpose of your true-up testimony?

A. The purpose of this testimony is to present and briefly discuss the true-up allocation factors provided to Staff witness V. William Harris for use in annualizing fuel expense between MPS and L&P.

Q. What are the allocation factors that you recommend the Commission adopt?

A. The Commission should adopt Staff's true-up allocation factors of ** _____ ** to L&P and ** _____ ** to MPS for the purposes of allocating fuel costs between L&P and MPS.

Q. Have the allocation factors shifted since Staff's direct filing and if so can you explain the shift?

True-Up Direct Testimony of
Erin L. Maloney

1 A. Yes the allocation percentage assigned to L&P increased approximately
2 1.5% and likewise MPS's decreased approximately 1.5% due to the fact that L&P
3 experienced a higher rate of load growth than MPS between the end of the test year and
4 the true-up date.

5 Q. What megawatt amounts have been assigned to L&P and MPS from the
6 Iatan 2 generation plant for the purpose of re-calculating the allocation factors for this
7 true-up?

8 A. As in Staff's direct filing, Staff has assigned 65.36% (100 of 153 MWs) of
9 the available Iatan 2 generation to L&P and 34.64% (53 of 153 MWs) of the available
10 Iatan 2 generation to MPS.

11 Q. Does this conclude your true-up testimony?

12 A. Yes.