

Exhibit No.:

Issues: Cash Working Capital,  
Materials and Supplies—Other  
Than Fuel, Prepayments,  
Payroll and Payroll  
Related Adjustments

Witness/Type of Exhibit: Brandel,  
Direct

Sponsoring Party: Missouri Public  
Service Commission

Company: Kansas City Power  
and Light Company

Case No.: HO-86-139

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY DIVISION

DIRECT TESTIMONY

OF

ELIZABETH A. BRANDEL

Jefferson City, Missouri  
February, 1987

Exhibit No. 6  
Date 10/17 Case No. HO-86-139  
Revised 10/17/87

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the matter of the investigation                     )  
of steam service rendered by                         )  
Kansas City Power & Light Company.                 )  
Case No. HO-86-139

AFFIDAVIT OF ELIZABETH A. BRANDEL

STATE OF MISSOURI             )  
                                      )  
COUNTY OF COLE               ) ss

Elizabeth A. Brandel, of lawful age, on her oath states: That she has participated in the preparation of the attached written testimony and appendices/schedules attached thereto in question and answer form, consisting of 24 pages of testimony to be presented in the above case, that the answers in the attached written 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.

  
Elizabeth A. Brandel

Subscribed and sworn to before me this 20th day of February, 1987.

  
Notary Public

My Commission expires

June 18, 1989

Joyce C. Neuner, Notary Public  
Greene County, State of Missouri  
My Commission Expires June 18, 1989

1 PREPARED TESTIMONY

2 OF

3 ELIZABETH A. BRANDEL

4 KANSAS CITY POWER & LIGHT COMPANY

5 CASE NO. HO-86-139

6 Q. Please state your name and business address.

7 A. Elizabeth A. Brandel, University Towers II, 700 East Eighth  
8 Street, Kansas City, MO 64106.

9 Q. By whom are you employed and in what capacity?

10 A. I am employed by the Missouri Public Service Commission  
11 (Commission) as a Regulatory Auditor.

12 Q. Please describe your educational background.

13 A. I attended Pittsburg State University in Pittsburg, Kansas  
14 and received a Bachelor of Business Administration with a major in  
15 Accounting in May, 1985. In May of 1986, I received a Master of Business  
16 Administration with a major in Accounting from Pittsburg State University.

17 Q. Please describe the nature of your duties while employed  
18 with the Commission.

19 A. I have, under the direction of the Chief Accountant, Utility  
20 Division, assisted with the audit and examination of the books and records  
21 of utility companies operating within the State of Missouri regarding  
22 proposed rate increases and compliance with Commission orders.

23 Q. Have you been involved with the audit and examination of the  
24 books and records of any other utilities?

25 A. Yes. United Telephone Company of Missouri. Case No.  
26 TR-86-117.

27 Q. Have you made an examination of the books and records of  
28 Kansas City Power and Light Company?

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1           A. Yes, with the assistance of other members of the Commission  
2 Staff.

3           Q. Please describe your areas of responsibility in this case.

4           A. My principle areas of responsibility in this case have been  
5 cash working capital, material and supplies--other than fuel, prepayments,  
6 and payroll and payroll-related adjustments. I am also responsible for  
7 the appropriate level of rate case expense to be included in the  
8 determination of the revenue requirement in this case.

9           Q. What Accounting Schedules and Adjustments are you  
10 sponsoring?

11           A. I am sponsoring Accounting Schedules 8, 9, 11-1 and 11-2  
12 and Adjustments S-3.1, S-4.1, S-5.1, S-6.1, S-7.1 through S-7.9, S-9.3,  
13 and S-9.4.

14           Q. How did Staff determine the amount of cash working capital  
15 to include as part of steam utility rate base?

16           A. Staff determined the level of cash working capital by  
17 utilizing a lead/lag study.

18           Q. Is the methodology which you employed in deriving cash  
19 working capital consistent with that utilized by the Staff in past rate  
20 cases?

21           A. Yes, it is. The methodology which I employed has been used  
22 by Staff and adopted by this Commission in numerous rate cases. Staff has  
23 adopted a standard set of definitions for cash working capital terms as  
24 they relate to lead/lag studies and has developed a standard set of  
25 principles to follow.

26           Q. Has Staff filed lead/lag studies using the same methodology  
27 as described in this testimony in other NIPR rate cases?  
28

1           A. Yes, starting with Kansas City Power and Light Company (KCPL  
2 or Company) Rate Case No. ER-78-252 and in every successive KCPL rate  
3 case, Staff has utilized the same lead/lag methodology. These rates cases  
4 are Case Nos. ER-80-48, HR-81-15, ER-81-42, ER-82-66, HR-82-67, ER-83-49  
5 and ER-85-128.

6           Q. What is cash working capital?

7           A. Cash working capital is the amount of cash necessary for a  
8 utility to pay the day to day expenses incurred in providing services to  
9 the ratepayers.

10          Q. What are the sources of cash working capital?

11          A. The ratepayer and the investor are the sources of cash  
12 working capital.

13          Q. How does the investor supply cash working capital?

14          A. When the Company spends cash to pay for an expense before  
15 the cash is provided by the ratepayer, the cash must be provided by the  
16 investor. This cash represents a portion of the investors' total  
17 investment in the Company.

18          Q. How are the investors compensated for the cash working  
19 capital funds they provide?

20          A. Cash working capital is included in rate base which provides  
21 for a return on the investors' investment.

22          Q. How do ratepayers supply cash working capital?

23          A. The ratepayers supply cash working capital when they pay for  
24 service they receive from the Company before the Company must pay for the  
25 expenses incurred to provide that service.

26          Q. How are the ratepayers compensated for the cash working  
27 capital they provide?  
28

1           A. The ratepayers are compensated for the cash working capital  
2 they provide by having the cash working capital component of rate base  
3 reduced by the amount of funds they provide.

4           Q. What is the purpose of a lead/lag study?

5           A. A lead/lag study determines the amount of funds that are  
6 necessary on a day to day basis in order for the Company to provide  
7 service to the ratepayers. A lead/lag study also determines who supplies  
8 those funds. A negative cash working capital requirement indicates that  
9 the ratepayer provided the cash working capital in the aggregate during  
10 the test period. A positive cash working capital requirement indicates  
11 that the investor provided the cash working capital in the aggregate  
12 during the test period.

13           Q. Please describe the approach taken by Staff to perform its  
14 lead/lag study for this case, Case No. HO-86-139.

15           A. To determine the cash working capital amount which directly  
16 relates to steam operations, Staff calculated specific lags. For the cash  
17 working capital requirement for the Company's electric operations which is  
18 allocated to steam operations ("Indirect CWC"), Staff used an allocated  
19 portion of the level of cash working capital determined by the  
20 Commission's Report and Order in Case Nos. ER-85-128 and HO-85-185. These  
21 allocations are discussed in the prefiled direct testimony of Staff  
22 witness Kuensting.

23           Q. Please describe Accounting Schedule 11-2.

24           A. Accounting Schedule 11-2 is Staff's calculation of Indirect  
25 Cash Working Capital, which represents the cash working capital  
26 requirement for the Company's electric operations which is allocated to  
27 steam operations.

28           Q. Please describe Accounting Schedule 11-2.

1           A. Accounting Schedule 11-1 is Staff's calculation of direct  
2 Cash Working Capital relating to the cash working capital requirement  
3 directly assigned to KCPL's steam utility operations.

4           Q. Please explain the various "lags" used in the Staff lead/lag  
5 study to calculate cash working capital.

6           A. There are two major lags used by Staff to calculate the cash  
7 working capital requirement:

8                 Revenue Lag -

This lag measures the amount of time  
between the provision of service by  
the Company and the receipt of the  
payment for that service from the  
ratepayers.

13                Expense Lag -

This lag measures the amount of time  
between the receipt of goods or  
services by the Company, and the  
payment (by the Company) of these  
expenses incurred in providing  
service to the ratepayers.

19           Q. Are there any subcomponent lags that make up the revenue  
20 lag?

21           A. Yes, there are. They are defined as follows:

22                 Usage Lag -

This is the midpoint or average of  
the period of time elapsed from the  
beginning of the first day of a  
service period (the meter reading  
day) to the end of the last day of a  
service period (the next meter read  
date).

Billing Lag -

This is the period of time incurred between the end of the last day of a service period and the day the bill is placed in the mail by the Company.

Collection Lag -

This is the period of time incurred between the day a bill is placed in the mail by the Company and the day the Company collects payment from the ratepayer for services rendered.

Q. How does the Staff's lead/lag study determine the amount of cash working capital provided by the investor and the ratepayer?

A. The Staff's lead/lag study compares the revenue lag to the expense lag for the expenses incurred by the Company to provide service to the ratepayer on a day to day basis. When the Company must pay for an expense before the funds (revenues) are provided by the ratepayer, cash working capital must be provided by the investor. When the ratepayer provides funds (revenues) before the Company must pay for an expense, the ratepayer has provided the cash working capital which is available for Company's use.

Accounting Schedule 11-1 shows the Staff's calculation of the revenue and expense lags for all items considered by the Staff to have an effect on the Company's cash working capital requirement. Column 6 in Accounting Schedule 11-1 lists the cash working capital requirement for each item considered in the Staff's study. A positive number illustrates situations where the Company must pay for an expense before the funds (revenues) are provided by the ratepayer. In this instance, the investor provided cash working capital. A negative amount in this column illustrates situations where the Company receives funds (revenues) from

1 the ratepayer before the Company must pay for an expense. The ratepayer  
2 provided the cash working capital in this instance.

3 In this case, Staff's study shows that the cash working capital  
4 provided by the ratepayer exceeded the amount provided by the investor.  
5 Therefore, Staff has reduced the working capital component in the steam  
6 utility rate base in order to reflect the amount of cash working capital  
7 provided by the ratepayer. In this way, the ratepayer is compensated for  
8 providing funds to the Company "up front".

9 Q. Please explain in detail how the revenue lags were  
10 determined as shown on Accounting Schedule 11-1.

11 A. Staff utilized two revenue lags in the calculation of its  
12 cash working capital component to rate base. The revenue lag of 37.75  
13 days associated with lines 1-16 was calculated using an analysis of steam  
14 utility customers' accounts. The revenue lag shown on lines 17-18 for  
15 gross receipts taxes (GRT) is the collection lag of 17.58 days which was  
16 computed as a component of the steam utility customers' revenue lag.

17 Q. Why is Staff using a different revenue lag for GRT than it  
18 is using for all other expense items on Accounting Schedule 11-1?

19 A. Staff is not using a different revenue lag for GRT but is  
20 using the collection lag of 17.58 days. The collection lag is a component  
21 of the revenue lag. The collection lag serves as the basis for  
22 calculating the gross receipts tax expense lag. This is used because the  
23 Company has not provided any service to its ratepayers but merely acts as  
24 a collecting agent for these taxes.

25 Q. You stated earlier in your testimony that there are three  
26 subcomponent lags that make up the revenue lag; the usage lag, billing lag  
27 and collection lag. Could you please describe these lags, as they relate  
28 to this case, in more detail?

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1           A. Yes. The usage lag as used in this cash working capital  
2 study was 15.21 days. It was derived by taking 365 days in the year,  
3 dividing by 12 months and then dividing the result by 2.

4           The billing lag was determined to be 4.96 days. From  
5 information Company supplied to Staff in response to Staff Data  
6 Information Request No. 423 (attached as Schedule 1), Staff determined  
7 that it took 4.96 working days on the average to process a bill. The lag  
8 of 4.96 days includes weekends and holidays, as the average was calculated  
9 from actual meter reading and billing dates provided in response to Staff  
10 Data Information Request No. 423.

11           The collection lag was computed to be 17.58 days. It was  
12 derived by using an analysis of steam utility customers' accounts. Staff  
13 used a sample of 12 steam utility customers, which together represent  
14 approximately 87% of thirteen months of total steam utility revenues  
15 (August, 1985 to August, 1986) and analyzed their payment patterns over  
16 the aforementioned thirteen months to calculate the collection lag of  
17 17.58 days.

18           Q. Will you please explain Staff's calculation of each expense  
19 lag appearing on Accounting Schedule 11-1?

20           A. The first line item appearing on Accounting Schedule 11-1 is  
21 Payroll Expense which has been subdivided into five components:

- 22           1. Paid Absence - Vacation
- 23           2. Paid Absence - Deferred Vacation - 1986
- 24           3. Federal Withholding
- 25           4. Net Payroll, and
- 26           5. Paid Absence - Other.

27           Q. What is the nature of the expense denoted as Paid Absence -  
28 Vacation?

1           A. Paid Absence - Vacation represents KCPL's vacation  
2 liability. KCPL currently records estimated expenses related to its  
3 future liability for vacations earned by non-management employees.  
4 Because non-management employee vacations can be earned in one time period  
5 but not taken until later periods, it is necessary to reflect the cost of  
6 vacations earned currently in expense by accruing estimated vacation  
7 liabilities.

8           Q. Does the ratepayer pay rates which include the costs of  
9 estimated future vacation payments earned currently?

10          A. Yes, the accrued expense for future vacation payments for  
11 non-management employees is currently included in cost of service. The  
12 Company enjoys the use of accrued vacation amounts from the time they are  
13 received from the ratepayers (recorded as expense) until the amounts are  
14 actually paid to non-management employees as vacation wages. This is  
15 generally in a later time period.

16          Q. How did Staff calculate the average period of time that  
17 elapses between the accrual of future vacation costs and the actual  
18 payment of these costs as represented by the lag for Paid Absence -  
19 Vacation (Accounting Schedule 11-1, line 2, column D)?

20          A. This lag was developed by Staff in Case No. ER-85-128.  
21 Staff used the same lag for this case. This lag was computed by using  
22 1983 as the accrual period and 1984 as the payment period. Staff has  
23 assumed that this vacation was evenly earned and accrued throughout the  
24 year. Therefore, Staff calculated the lag relating to vacation accruals  
25 using 182.5 days as the average date that non-management employees earn  
26 vacations. This is also the average date that the Company currently  
27 records the accrual and expense currently. Staff determined through  
28 weighting of the actual vacation taken in 1984, that as the average.

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1 Company non-management employees took vacation 211.81 days from the  
2 beginning of the year. The two lags were added together to arrive at  
3 394.31 lag days for non-management employees. This lag was then  
4 composited with the vacation lag of 43.21 days for management employees to  
5 arrive at the composite lag days of 260.24 days as shown on line 2, column  
6 D of Accounting Schedule 11-1. The lag days for management employees is  
7 less than the expense lag for non-management employees because management  
8 employees can take vacation in the same year in which it is accrued. Due  
9 to the flexible benefits plan for management employees, implemented by  
10 KCPL in January, 1984, management employees no longer must accrue vacation  
11 in the current year to be eligible to take vacation in the following year.  
12 Instead, management employees can accrue their vacation in the year they  
13 take it. The 43.21 lag days was calculated by taking the actual vacation  
14 dollars paid in 1984 and weighting them monthly to the mid-point of 1984.  
15 Staff assumed that management employees accrued vacation evenly throughout  
16 1984.

17 Q. Please explain line 3 on Accounting Schedule 11-1, denoted  
18 as Paid Absences - Deferred Vacation 1986.

19 A. Paid Absences - Deferred Vacation 1986 represents the amount  
20 of vacation that KCPL employees, both management and non-management,  
21 deferred during 1986 to take at some point in the future.

22 Q. Please explain what is meant by deferred vacation.

23 A. Deferred vacation includes the amount of vacation earned but  
24 not taken by management employees in the current year as well as the  
25 amount of vacation earned in the previous year by non-management employees  
26 but not taken in the current year. Some employees defer vacation for  
27 several years.

28 Q. Please describe line 11 on Accounting Schedule 11-1.

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1           A. Line 11 on Accounting Schedule 11-1, entitled Paid Absences  
2 - Deferred Vacation previous 1986, refers to vacation KCPL employees  
3 deferred in years prior to 1986 to take at some point in the future.

4           Q. Why has Staff included the cumulative balance of deferred  
5 vacation prior to 1986 as a part of its lead/lag study?

6           A. The cumulative balance of deferred vacation prior to 1986  
7 contains cost of service expenses paid by the ratepayers in previous  
8 years. The Company has use of these ratepayer provided funds until the  
9 employees take their deferred vacation.

10           Because the dollars in the cumulative balance of pre-1986  
11 deferred vacation do not represent current 1986 cash expenses, no expense  
12 or revenue lag days have been applied to this balance. Notwithstanding  
13 the fact that no expense or revenue lag days are applied, these dollars  
14 are properly included in the cash working capital schedule as an offset to  
15 rate base because the Company has the use of these ratepayer supplied  
16 funds until the deferred vacation is actually taken by the Company's  
17 employee.

18           Q. Would you please explain Federal Withholdings as shown on  
19 line 4 of Accounting Schedule 11-1?

20           A. Yes. Line 4 on Accounting Schedule 11-1 relates to Federal  
21 Withholdings. These are amounts withheld from an employee's wages for  
22 Federal Withholding Taxes and FICA (employee's share only). The Federal  
23 Withholding Taxes and FICA have identical payment procedures. The taxes  
24 must be paid by the Company three banking days after the close of the  
25 eighth-monthly period. Staff calculated the lag shown on Column D by  
26 weighting together the three categories of employees, i.e. those paid  
27 monthly, semi-monthly and bi-weekly, to arrive at the weighted lag day.  
28 This lag was developed by Staff in Case No. 88-63-128.

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1 Q. How was the Net Payroll lag determined?

2 A. For this case, Staff used the same lag that was developed by  
3 Staff in Case No. ER-85-128. Staff determined the time-lapse between the  
4 average date that the Company's employees earned payroll by providing  
5 service to the Company and the date that they were paid by the Company.  
6 To calculate this time lapse Staff took the three classes of employees,  
7 i.e. monthly, semi-monthly and bi-weekly, and computed a lag for each  
8 employee group. The results were weighted together to arrive at the Net  
9 Payroll lag as shown in Column D, line 5, Accounting Schedule 11-1.

10 Q. Please explain line 6, Paid Absence - Other, appearing on  
11 Accounting Schedule 11-1.

12 A. Paid Absence - Other relates to paid absences due to  
13 holidays, sick leave, jury duty and any other paid absence with the  
14 exception of Paid Absences - Vacations, which was previously discussed.

15 Q. Why was Paid Absence - Other separated from Paid Absence -  
16 Vacation?

17 A. Paid Absences was broken out between Paid Absences - Other  
18 and Paid Absences - Vacations because they have different expense lags.

19 Q. How did Staff calculate the lag days for Paid Absence -  
20 Other as it appears on line 6, Column D, Accounting Schedule 11-1?

21 A. Staff assumed that the lag days associated with Paid  
22 Absences - Other had the same lag as Net Payroll. This is reflected on  
23 line 6, Column D, Accounting Schedule 11-1.

24 Q. Please explain the gas expense lag on line 8 of Accounting  
25 Schedule 11-1.

26 A. The gas expense lag measures the time between the Company's  
27 receipt of natural gas for use by SCPL and payment for that natural gas.  
28

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1 Staff assumed that the receipt of the gas is represented by the midpoint  
2 of the service period.

3 Q. What other fuel lags were computed pertaining to steam heat  
4 operations?

5 A. Staff has utilized the oil expense lag at Grand Avenue  
6 Station developed by Staff in Case No. ER-85-128. The Company has not  
7 burned oil at Grand Avenue Station since November, 1985. However, a level  
8 of oil is maintained at Grand Avenue for testing and training purposes, as  
9 explained in the prefiled direct testimony of Staff witness Gary A.  
10 Kuensting. Thus, the historical oil expense lag is used in this case to  
11 properly reflect the use of oil at Grand Avenue Station. This is shown on  
12 line 7 of Accounting Schedule 11-1.

13 Q. Please define cash vouchers.

14 A. Cash vouchers include all operating and maintenance expenses  
15 other than those analyzed separately by Staff in the lead/lag study.  
16 Staff studied the large dollar items that can be examined and which Staff  
17 can separately annualize on an individual basis. These items include  
18 payroll and fuel expenses, which have been discussed previously. All  
19 other operating and maintenance expenses which require an outlay of cash  
20 to provide service to the ratepayer on a day to day basis are examined in  
21 Staff's cash voucher study.

22 Q. Would you please explain line 9 on Accounting Schedule 11-1?

23 A. The lag days shown in Column B were computed by Staff  
24 through a random sample of cash vouchers performed during NCPD Case No.  
25 ER-85-128. For each voucher reflecting payment, the Staff determined the  
26 time of receipt of the service from the Company's vendors and suppliers by  
27 the Company and the time of payment for that service by the Company. Each  
28

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1 lag was weighted based on the amount of the payment. Through this  
2 detailed cash voucher study, Staff computed a 37.71 day lag.

3 Q. Please define the term cash working capital requirement as  
4 it appears on Accounting Schedule 11-1, line 12.

5 A. The cash working capital requirement summarizes the  
6 relationship between the revenue lag and the expense lag for the Company's  
7 annualized operating and maintenance expenses as determined by the Staff.  
8 Since the cash working capital requirement shown on Accounting Schedule  
9 11-1, line 12, Column G, is a negative number, it represents cash that  
10 must be provided by the ratepayer. This indicates that the Company  
11 receives revenues relating to this amount of operating and maintenance  
12 expense prior to paying for the expense.

13 Q. Please explain the expense lag for Accrued Interest on Debt  
14 which is shown on line 13, Column D, on Accounting Schedule 11-1.

15 A. This lag was developed by Staff in Case Nos. ER-85-128 and  
16 EC-85-185, and was also used for this case. The expense lag for interest  
17 expense was quantified by determining the midpoint of the period for which  
18 the interest payment applies and the release of cash at the time of the  
19 interest payment date, based on the debt outstanding for the twelve months  
20 ending December 31, 1984.

21 Q. Why is it appropriate to offset the cash working capital  
22 requirement of the Company by the expense lag associated with the payment  
23 of interest?

24 A. The obligation to pay the interest on debt is a known and  
25 certain obligation and the amount is precollected from the ratepayer for  
26 the sole purpose of passing it on to the bondholders. As in the case of  
27 certain tax amounts precollected through rates, these funds, while in the  
28 hands of the Company, are a source of cost free cash provided by the

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1 ratepayer. The Company has the use of these funds, for whatever purpose  
2 it so desires, for a period of time before passing them on to the  
3 bondholders. These are ratepayer-supplied funds and the net expense lag  
4 associated with them should be an offset to the cash working capital  
5 component to rate base.

6 Q. Please describe the Income Tax lag days as shown on line 14,  
7 Column D on Accounting Schedule 11-1.

8 A. This component of rate base relates to Federal and Missouri  
9 income taxes, as well as the Kansas City Earnings Taxes currently payable  
10 by the Company. Staff derived a lag of 77.23 days by compositing these  
11 lags. This methodology was developed by Staff in Case No. ER-85-128.

12 Q. Referring now to line 15 of Accounting Schedule 11-1, please  
13 discuss Taxes Other Than Income, Property and Gross Receipts.

14 A. Included in the Taxes Other Than Income, Property and Gross  
15 Receipts are the employer's portion of FICA and Unemployment Compensation  
16 Taxes levied by the state and federal governments. Also included in this  
17 line item are the state capital stock taxes. Staff computed a lag for  
18 Federal and State Unemployment Compensation Taxes for Case No. ER-85-128,  
19 using the same lag for the FICA employer's share as Staff computed for the  
20 employees' share (as shown on line 4 of Accounting Schedule 11-1). Staff  
21 also computed a lag for state capital stock taxes for Case No. ER-85-128.  
22 These lags were also used for this case. Staff then weighted the lags  
23 associated with each of these three taxes and derived a composite lag of  
24 18.95 days for Taxes Other Than Income, Property and Gross Receipts Taxes.

25 Q. Please describe line 16 of Accounting Schedule 11-1.

26 A. Line 16 on Accounting Schedule 11-1 is Property Taxes paid  
27 by the Company to the Missouri taxing authorities. This lag was computed  
28 by the Staff for Case No. ER-85-128 using the time between the midpoint of

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1 the period to which the tax payment applies and the payment due date. The  
2 same lag was used for this case.

3 Q. How were the 4% and 6% Missouri Gross Receipts Tax lags  
4 calculated as they appear on line 18 on Accounting Schedule 11-1?

5 A. These lags were calculated by Staff in Case No. ER-85-128,  
6 comparing actual payment dates to actual periods of time that GRT are  
7 collected from the ratepayer. The expense lags measure the time period  
8 between the date KCPL mails the steam utility bills to its customers and  
9 the date KCPL receives the payments.

10 Q. When are GRT collected from the ratepayer?

11 A. GRT are collected monthly from the ratepayers as a  
12 percentage added on to their steam utility heat bills.

13 Q. When does the Company remit the 4% GRT to the taxing  
14 authorities?

15 A. The payment dates are the 30th day of each month.

16 Q. What is the basis for the lag shown on line 17, Column D,  
17 Accounting Schedule 11-1?

18 A. This lag represents the weighted average length of time that  
19 elapses between the billing of GRT and the subsequent payment to the City.  
20 It reflects the fact that each monthly payment of GRT is based upon GRT  
21 billed to customers the previous month.

22 Q. When does the Company remit the 6% GRT to the taxing  
23 authorities?

24 A. The payment dates are January 30, April 30, July 30, and  
25 October 30 of each year.

26 Q. What is the basis for the lag shown on line 18, column D,  
27 Accounting Schedule 11-1 related to the 6% GRT?  
28

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1           A. This lag represents the weighted average length of time that  
2 elapses between the billing of the 6% GRT and the subsequent payment to  
3 the City. All 6% GRT quarterly payments are based upon the preceding  
4 three month's GRT billings. It reflects the fact that the payment on  
5 January 30 in a given year is based upon GRT billed to customers in  
6 October, November, and December of the prior year.

7           Q. Will you briefly summarize the results of Staff's lead/lag  
8 study?

9           A. Yes. After the difference between the revenue lag and  
10 expense lag for each item in the study has been calculated, this number is  
11 weighted based on the annualized or normalized level of expense for that  
12 item. The individual calculations, when totaled, result in the total Net  
13 Ratepayer Supplied Funds as shown on line 20, Column G, Accounting  
14 Schedule 11, and illustrates, in this case, the excess of cash working  
15 capital supplied by the ratepayer over the amount supplied by the  
16 investor. Therefore, the cash working capital component is subtracted  
17 from rate base to compensate the ratepayer for the use of his or her  
18 funds.

19           Q. Were the same principles and methodologies employed by Staff  
20 to develop the indirect Cash Working Capital requirement as shown in  
21 Accounting Schedule 11-2?

22           A. Yes.

23           Q. Does this conclude your prepared testimony regarding cash  
24 working capital?

25           A. Yes, it does.

26           Q. Please explain Staff's amount of steam heat Materials and  
27 Supplies—Other Than Fuel as shown in Accounting Schedule 8.  
28

1           A. Staff used the last known balance of Grand Avenue Station  
2 Materials and Supplies (M&S) in Accounting Schedule 8. A study of  
3 historical M&S balances showed that this rate base item has a declining  
4 trend. Additionally, cost-cutting measures implemented May 6, 1986 by the  
5 Company's Board of Directors call for further reductions in M&S inventory  
6 balances. This is discussed in the Fiscal Recovery Plus program, an  
7 excerpt of which is attached as Schedule 2. Added to this amount is an  
8 allocated portion of the electric M&S, as discussed in the prefiled direct  
9 testimony of Staff witness Kuensting.

10           Q. Please explain Staff's amount of steam heat prepayments as  
11 shown in Accounting Schedule 9.

12           A. Staff used a thirteen month average because of the  
13 fluctuating nature of the prepayments accounts throughout the year. By  
14 using a thirteen month average, the fluctuating balances are smoothed out.  
15 These amounts are allocated to steam heat from total Company amounts based  
16 on the nature of each account. For example, auto insurance is allocated  
17 based on transportation equipment. Added to this amount is an allocated  
18 portion of the electric prepayments, as discussed in the prefiled direct  
19 testimony of Staff witness Kuensting.

20           Q. In reference to Staff's revenue requirement exhibit, which  
21 payroll adjustments are you sponsoring?

22           A. I am sponsoring Accounting Adjustments 3-3.1, 3-4.1, 3-5.1,  
23 3-6.1, 3-7.1 through 3-7.9, 3-8.3, and 3-9.4 illustrated in Accounting  
24 Schedule 13.

25           Q. Would you please explain Accounting Adjustments 3-3.1,  
26 3-4.1, 3-5.1, 3-6.1 and 3-7.1?

27           A. These adjustments represent Staff's payroll annualization  
28 adjustments to the steam utility production operations, maintenance,

1 distribution, customer accounts, and administrative and general categories  
2 of steam utility heat expense.

3 Q. Please explain Staff's payroll annualization.

4 A. Staff's payroll annualization is based on the direct utility  
5 steam employee levels, which includes Grand Avenue Station and the Steam  
6 Department. This method reflects direct steam heat payroll and a  
7 percentage of Total Company Administrative and General (A&G) expenses  
8 allocated to steam.

9 Q. What time period was used to calculate Staff's payroll  
10 annualization?

11 A. Staff's steam utility payroll annualization is based on the  
12 most recent pay periods by employee category. The pay rates in effect at  
13 December 31, 1986 and annualized employee levels were used to annualize  
14 payroll.

15 Q. Why did Staff not use test year employee levels?

16 A. The test year used by KCPL in this case is the calendar year  
17 ending December 31, 1985 updated through December 31, 1986 for known and  
18 measurable changes. From January, 1985 through October of 1985, Grand  
19 Avenue Station was used for both electric and steam production, and thus  
20 the employee level at Grand Avenue was much higher than that level  
21 appropriate for the current steam-only Grand Avenue operations. Schedule  
22 3 illustrates the manpower levels at Grand Avenue for 1985 and 1986.

23 Q. What employee levels were used to calculate Staff's payroll  
24 annualization?

25 A. Staff utilized the gas-only utility steam operations  
26 employee level for Grand Avenue Station which was provided in response to  
27 Staff Data Information Request No. 427, and the 1987 authorized employee  
28 level for the Steam Utility Department, which was provided in response to

Prepared Testimony of  
Elizabeth A. Brandel

1 Staff Data Information Request No. 484 (attached as Schedules 4 and 5,  
2 respectively). Staff believes that the employee levels it is using are a  
3 valid representation of the levels necessary for steam utility operation.  
4 Staff has not yet received a response to a data information request  
5 concerning the allocation of labor hours to utility steam heat operations  
6 for employees at Grand Avenue Station. When the response to this data  
7 information request is received, the amount of Staff's payroll  
8 annualization may change.

9 Q. Are there any other amounts included in Staff's payroll  
10 annualization?

11 A. Yes. Also included in the payroll annualization are  
12 portions of those salaries which can be directly traced as chargeable to  
13 steam utility operations.

14 Q. Has Staff included any wage increases for bargaining units  
15 in its payroll annualization?

16 A. Yes. For Union Local 412 (Grand Avenue Station) the most  
17 current wage increase of 4% is included. For Local Union No. 1464 (Steam  
18 Department), no wage increase is included.

19 Q. Please explain why no wage increase is included for Local  
20 1464.

21 A. Local Union 1464 and ECPL have not had a collective  
22 bargaining agreement since October of 1981. ECPL's last proposal for an  
23 agreement was made July 1, 1983 and was rejected by the Union. No  
24 negotiations are in process at this time. Therefore, because no  
25 contractual wage increase exists, no wage increase has been included for  
26 Local Union No. 1464.

27 Q. How were the payroll adjustments derived?

28

1           A. Staff derived its adjustment to payroll expense by  
2 subtracting the test year per book level of gross payroll for steam  
3 utility heat from Staff's annualized steam heat payroll.

4           Q. Please define the term "slippage".

5           A. As defined by the Company, "slippage" occurs when:

6 with a static work force, the loss of experienced personnel  
7 through retirement, termination, death, etc. and the  
8 acquisition of new personnel tends to lower the rise in the  
9 average rate of pay for the entire group. In an expanding  
10 work force, addition of personnel of entry level positions  
11 also tends to lower the rise in average pay. Conversely,  
12 in a contracting work force, a reduction in the less  
13 experienced personnel tends to increase the rise in average  
14 pay.

15 (See Schedule 6)

16           Q. Has Staff included an adjustment for slippage in this case?

17           A. No. Due to the relatively small size of KCPL's utility  
18 steam heat operations, a slippage adjustment would be immaterial. The  
19 electric dollars allocated to steam from the Case No. EO-85-185 order  
20 reflect a slippage adjustment. The direct steam payroll annualization  
21 does not. Staff reserves the right to make this adjustment for future  
22 rate cases.

23           Q. How are Administrative and General expenses allocated to  
24 steam utility heat operations?

25           A. Administrative and General (A&G) consists of A&G Salaries,  
26 Injuries and Damages, Employee Benefits, and Maintenance of General Plant.  
27 A&G expenses allocated to steam heat include both "direct" utility steam  
28 heat A&G and also those A&G expenses allocated to steam utility heat based  
29 on the use of electricity at Grand Avenue (indirect A&G). The "direct"  
30 steam portion are those A&G expenses directly related to steam utility  
31 heat operations but not charged directly on the steam utility heat income  
32 statement. The "indirect" A&G, allocated to steam heat based on the use

1 electricity at Grand Avenue, is discussed in the prefiled direct testimony  
2 of Staff witness Kuensting.

3 Q. Please explain Accounting Adjustment S-7.3.

4 A. The purpose of Accounting Adjustment S-7.3 is to remove the  
5 Administrative Expense Transfer-Debit, which is simply KCPL's allocated  
6 portion of A&G to support steam operations.

7 Q. Why was this adjustment made?

8 A. The Administrative Expenses Transfer-Debit is KCPL's  
9 allocated portion of A&G to support steam utility operations. It is  
10 adjusted by the Staff to reverse this expense so that Staff can then  
11 allocate a portion of "direct" A&G to utility steam operations using its  
12 basis.

13 Q. Please explain Accounting Adjustments S-7.4, S-7.5, and  
14 S-7.9.

15 A. Accounting Adjustments S-7.4, S-7.5, and S-7.9 are made to  
16 annualize the "direct" portion of steam utility A&G, which represents the  
17 A&G expense for support of steam utility heat operations. This includes  
18 A&G Salaries, Injuries and Damages, and Maintenance of General Plant,  
19 respectively.

20 Q. Please explain further the A&G support for steam utility  
21 operations.

22 A. The annualization of steam utility A&G represents those A&G  
23 expenses which would be incurred if the KCPL steam utility operations were  
24 a "stand-alone" operation ("direct" A&G). These expenses must be  
25 annualized on an allocated basis because KCPL does not charge these  
26 expenses directly to steam. Rather, KCPL charges A&G expenses to steam  
27 utility operations through its A&G transfer debit (and credit).  
28

1 Q. What bases were used by Staff to allocate "direct" A&G to  
2 steam operations?

3 A. A&G Salaries as well as Injuries and Damages were charged to  
4 steam based on the ratio of steam utility operations collective bargaining  
5 unit employees to Total Company collective bargaining unit employees.  
6 Maintenance of General Plant was charged to steam operations based on the  
7 ratio of steam utility plant in service to Total Company plant in service  
8 at December 31, 1986.

9 Q. Please explain Accounting Adjustment S-7.2.

10 A. The purpose of Accounting Adjustment S-7.2 is to remove from  
11 expense Interdepartmental Rents, which is composed of Depreciation, Taxes,  
12 and Return allocated by KCPL to steam utility heat operations to reflect  
13 Grand Avenue costs.

14 The Interdepartmental Rents account was used to charge steam  
15 utility operations for Grand Avenue station costs when Grand Avenue  
16 produced both steam and electricity. This account was eliminated in  
17 November, 1985, when electric operations at Grand Avenue were  
18 discontinued. This allocation of costs is no longer necessary and thus  
19 Staff has eliminated this amount from steam utility expenses.

20 Q. Please explain Staff's payroll fringe adjustments.

21 A. Accounting Adjustment S-9.3 annualizes FICA tax expense to  
22 recognize the 1987 tax rate of 7.15% and a taxable base of \$43,800. The  
23 annualization was computed using annualized steam heat wages and  
24 annualized steam heat employee levels.

25 Staff Accounting Adjustment S-9.4 annualizes unemployment taxes  
26 to reflect 1987 contribution rates and taxable wage bases compatible with  
27 the payroll annualizations.  
28

Prepared Testimony of  
Elisabeth A. Brandel

1           Staff Accounting Adjustment S-7.7 annualizes life, health, and  
2 accident insurance expenses utilizing September, 1986 premiums and  
3 annualized steam heat employee levels.

4           Staff Accounting Adjustment S-7.6 annualizes pension costs to  
5 reflect the September, 1986 contributions to the management Pension Plan  
6 and the Minimum ERISA funding of the Joint Trusted Pension Plan for the  
7 unions, as well as annualized steam heat employee levels.

8           Q. Please explain Staff Accounting Adjustment S-7.8.

9           A. The purpose of Accounting Adjustment S-7.8 is to reflect the  
10 appropriate amount of rate case expense to be included in the  
11 determination of revenue requirement in this case. Staff has amortized  
12 the 1986 amount of rate case expense over four years, which is consistent  
13 with the period of time since KCPL's last steam utility rate case, Case  
14 No. HR-82-67. Rate case expense is amortized in order to reflect the  
15 appropriate annual expense. Staff assumed that rate case expense will not  
16 be incurred every year.

17           Q. Does this conclude your testimony?

18           A. Yes, it does.  
19  
20  
21  
22  
23  
24  
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27  
28

NOV 24 1985

No. 423  
Class \_\_\_\_\_Data Information Request  
Kansas City Power & Light Company  
Case No. HO-86-139Requested From: Steve Cotton  
Date Requested: November 24, 1986  
Information Requested: \_\_\_\_\_

On the average, how many days does it take  
to process steam service bills, from the meter read  
date to mail date.

Requested By: Elizabeth D. Brand  
Information Provided: See the attached schedule for 1986 and 1987.

The attached information provided to the Missouri Public Service Commission Staff is response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. HO-86-139 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requester to have documents available for inspection in the ECP&L Kansas City, Missouri office, or other location mutually agreeable. Where identification of a document is required, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, address, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The provision "you" or "your" refers to Kansas City Power & Light Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: [Signature]Date Received: 2-2-88

KCPL

## Steam Heat Schedule

1986

<u>meter</u>	<u>mail</u>
<u>Reading</u>	<u>Date</u>
Jan 28-29	Feb 3
Feb 27-28	Mar 5
Mar 31-Apr 1	Apr 4
Apr 28-29	May 3
May 28-29	June 3
June 26-27	July 2
July 28-29	Aug 1
Aug 26-27	Sept 2
Sept 25-26	Oct 1
Oct 27-28	Oct 31
Nov 25-26	Dec 3
Dec 29-30	Jan 6

1987

<u>meter</u>	<u>mail</u>
<u>Reading</u>	<u>Date</u>
Jan 29-30	Feb 4
Feb 26-27	Mar 6
Mar 30-31	Apr 6
Apr 27-30	May 5
May 28-29	June 4
June 29-30	July 6
July 29-30	Aug 4
Aug 27-28	Sept 2
Sept 28-29	Oct 2
Oct 29-30	Nov 3
Nov 30	Dec 4
Dec 30-31	Jan 6

May 6, 1986

I. Construction Budgets: 1986-88

To stem the outflow of cash required to fund capital expenditures and thus improve KCPL's cash coverages and capitalization ratios, the prior approved Construction Budgets have been reduced as follows:

	<u>1986</u>	<u>1987</u>	<u>1988</u>
Current Budget (000's)	\$93,610	\$114,798	\$107,939
\$ Reductions	<u>21,335</u>	<u>34,904</u>	<u>18,339</u>
Revised Budget	\$72,275	\$ 79,894	\$ 89,600
% Reduction	23%	30%	17%

These reductions in the Revised Construction Budgets have been accomplished through suspension or deferral of projects to and beyond 1989, or through cancellation.

II. Inventories

Fuel inventories and materials and supplies are being reduced to minimize cash working capital requirements. KCPL will endeavor to reduce fuel inventories by \$4.7 million in 1986 and \$5.6 million in 1987. The Fuels Department is performing a risk assessment of these proposed fuel inventory reductions to insure that the risk of fuel shortages will not be unduly increased. Materials and supply inventories will be reduced by about \$800,000 through reduced inventory levels and an additional \$160,000 through expanded implementation of just-in-time delivery programs.

III. O&M Budgets: 1986-88

To stem the outflow of cash required for operating and maintenance expenses to improve KCPL's financial results from operations during the interim and thus improve its operating ratios, booked and cash earnings,

**BRANDEL-DIRECT**

Kansas City Power &amp; Light

Case No. HO-86-139

Grand Avenue Station Employee Levels

\*\*\*\*\*

1985		1986	
-----		-----	
JANUARY	99	JANUARY	72
FEBRUARY	100	FEBRUARY	72
MARCH	100	MARCH	71
APRIL	99	APRIL	69
MAY	105	MAY	67
JUNE	105	JUNE	67
JULY	103	JULY	67
AUGUST	96	AUGUST	61
SEPTEMBER	94	SEPTEMBER	50
OCTOBER	92	OCTOBER	47
NOVEMBER	91	NOVEMBER	47
DECEMBER	87	DECEMBER	45
AVERAGE 97.58		AVERAGE 61.25	

SOURCE: EMPLOYEES GROUPED BY DIVISION

No. 424  
Class \_\_\_\_\_

NOV 24 1986

Data Information Request  
Kansas City Power & Light Company  
Case No. HO-86-139Requested From: Steve CottsonDate Requested: November 24, 1986Information Requested: In the "Steam Analysis of Charges from Case" provided to STW by Rex Kitz, the current manpower level at Grand Avenue is shown as 39 employees (p. 1). In the response to IR #389, "The vs. Coal Creek Post Study," the manpower level is shown as 34 personnel at Grand Avenue (p. 2). Please explain why these differ and explain which manpower level is most current and reliable.

Will the reduction in manpower level at Grand Avenue affect only union employees, or will the department head, supervisors, or professional/professional positions also be eliminated? Please provide which positions will be eliminated as a result of the manpower reductions at Grand Avenue.

Requested By: Elizabeth A. BrandtInformation Provided: see attached

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon proper facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. HO-86-139 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their locations (2) make arrangements with requester to have documents available for inspection in the ECP&L Kansas City, Missouri office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, editor(s), date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of any kind in your possession, custody or control or within your knowledge. The phrases "you" or "your" refer to Kansas City Power & Light Company and its employees, contractors, agents or others employed by or acting in its behalf.

Date Received: 12/3/86

James L. Sigal  
12/3/86

Data Information Request No. 424  
Case No. HO-86-139

## Response:

With reference to the information provided by Mr. Kite, the 39 manpower level represents the current authorized manpower composed of the following:

<u>Management</u>		<u>Union</u>	
Plant Manager	1	Clerk	1
Secretary	1	Electricians	2
Shift Supervisor	1	Mechanics	4
Shift Foremen	4	Steam Plant Opers.	3
Maintenance Foreman	1	Asst. Steam Plant Opers.	3
Safety Representative	<u>1</u>	Painter	1
	9	Pipe Coverer	1
		Reliefmen	11
		Technicians	2
		Welders	<u>2</u>
			30

The "Gas vs. Coal Breakdown Cost Study" referenced a future possible manpower level of 34 which varied from the above by the following:

<u>Management</u>		<u>Union</u>	
Maintenance Foreman	-1	Painter	-1
Shift Foremen	-2	Pipe Coverer	-1

The authorized manpower level in the 1987-1988 manpower budget is 38. The position for the shift supervisor has been eliminated.

The actual manpower assigned to Grand Avenue as of October 31, 1986 is as follows:

<u>Management</u>		<u>Union</u>	
Plant Manager	1	Clerk	1
Secretary	1	Electricians	2
Shift Supervisor	0	Mechanics	11
Shift Foremen	4	Steam Plant Opers.	3
Maintenance Foreman	1	Asst. Steam Plant Opers.	3
Safety Representative	<u>1</u>	Painter	1
	8	Pipe Coverer	1
		Reliefmen	11
		Technicians	2
		Welders	<u>3</u>
			38

The actual manpower will be brought in line with the 1987 authorized by reassignment within IFO as other vacancies occur.

JEC 22 1986

No. 484

Class

Data Information Request  
 Kansas City Power & Light Company  
 Case No. HO-86-139

Requested From:

STEVE CATYREN

Date Requested:

DEC. 19, 1986

Information Requested:

WHAT IS THE 1987 AUTHORIZED MANPOWER IN THE  
 STEAM DEPARTMENT (UTILITY STEAM SERVICES)? PLEASE  
 ANSWER ON THE BASIS OF JOB TITLE AND NUMBER OF EMPLOYEES  
 FOR BOTH UNION AND MANAGEMENT

Requested By:

Elizabeth A. Brandel

Information Provided:

1987

Payroll No.

3206

MANAGER

Bus. Mgr.  
Emp. Supt.

Supervisor (Team)

In-Team Supervisor  
Traveler Man. Team  
MTS (Team Lead)Team Lead - Mgr.  
Lead Mgr. - Mgr.  
Team Lead - Mgr.

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. HO-86-139 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location; (2) make arrangements with requester to have documents available for inspection in the KCP&L Kansas City, Missouri office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, address, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, record logs, membership lists and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The phrase "you" or "your" refers to Kansas City Power & Light Company and its employees, contractors, agents or others employed by or acting on its behalf.

Signed By:

R. L. Blair

Date Received:

LGC

1-26-87

No. 1179  
Class \_\_\_\_\_Data Information Request  
Kansas City Power & Light Company  
Case No. ER-85-123

JUN 10 1985

Requested From:

S. Catron / J.W. Feild

Date Requested:

6/4/85

Information Requested:

Please define the term "slippage" and its components

Requested By:

M. Zimmerman

Information Provided:

With a static work force, the loss of experienced personnel through retirement, termination, death etc. and the acquisition of new personnel tends to lower the rise in the average rate of pay for the entire group. In an expanding work force, addition of personnel at entry level positions also tends to lower the rise in average pay. Conversely in a contracting work force, a reduction in the less experienced personnel tends to increase the rise in average pay.

The attached information provided to the Missouri Public Service Commission Staff is responsive to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon personal facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. ER-85-123 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requester to have documents available for inspection in the KCP&L Kansas City, Missouri office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document in a, book, letter, memorandum, report and state the following information as applicable for the particular document: name, title, number, author, date of publication and publication, address, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" include publications of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Kansas City Power & Light Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By:

J.W. Feild  
June 6, 1985

Data Received:

6-10-85