



1 PREPARED TESTIMONY

2 OF

3 SHARON K. WHITE

4 KANSAS CITY POWER & LIGHT

5 CASE NO. HO-86-139

6 Q. Please state your name and business address.

7 A. Sharon K. White, 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 employed by the Missouri Public Service Commission  
11 (Commission) as a Regulatory Auditor.

12 Q. Please describe your educational background.

13 A. I attended Avila College in Kansas City, Missouri, and  
14 received a Bachelor of Science in Business with a Major in Accounting in  
15 May, 1982. I also received a Masters of Business Administration degree  
16 with emphasis in Finance from Avila College in May, 1983.

17 Q. What has been the nature of your duties while employed with  
18 the Commission?

19 A. I have, under the direction of the Chief Accountant, Utility  
20 Division, assisted with audits and examinations of the books and records  
21 of utility companies operating within the State of Missouri in regard to  
22 proposed rate increases.

23 Q. Have you previously filed testimony before this Commission?

24 A. Yes, I have previously filed testimony before this  
25 Commission in Case Nos. HO-83-128 and HO-83-183, Kansas City Power and  
26 Light Company; Case No. TB-86-14, ALLTEL Missouri, Inc.; and Case No.  
27 CR-86-76, KPT-Gas Service Company.  
28

Prepared Testimony of  
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1 Q. With reference to Case No. HO-86-139, have you made an  
2 examination of the books and records of Kansas City Power & Light Company  
3 (Company or KCPL)?

4 A. Yes, with the assistance of other members of the Missouri  
5 Public Service Commission Staff.

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

7 A. My principal areas of responsibility are Revenues,  
8 Plant-In-Service, Accumulated Depreciation Reserve, Depreciation Expense,  
9 Property Taxes, and Taxes Other Than Income.

10 Q. With regard to Case No. HO-86-139, what Accounting Schedules  
11 are you sponsoring?

12 A. I am sponsoring the following Accounting Schedules:

13 2 -- Revenue Requirement

14 3 -- Rate Base

15 4 -- Plant-In-Service

16 5 -- Adjustments to Plant-In-Service

17 6 -- Depreciation Reserve

18 7 -- Adjustments to Depreciation Reserve

19 12 -- Income Statement

20 13 -- Adjustments to Income Statement

21 14 -- Depreciation Expense

22 17 -- Taxes Other Than Income

23 Q. With regard to Case No. HO-86-139, what Accounting  
24 Adjustments are you sponsoring?

25 A. I am sponsoring Accounting Adjustments P-1.1, S-1.1, S-1.1,  
26 S-2.1, S-3.3, S-4.3, S-5.2, S-6.1, S-9.1 and S-9.2.

27 Q. Ms. White, would you please explain Accounting Schedule 27  
28

1           A. Yes. Accounting Schedule 2 is the Revenue Requirement  
2 schedule which shows the gross revenue requirement. Staff witness Cary G.  
3 Featherstone will further address the Revenue Requirement schedule in his  
4 prefiled direct testimony.

5           Q. Would you please explain Accounting Schedule 3, Rate Base?

6           A. Yes. Accounting Schedule 3 is a listing of items comprising  
7 the original cost Rate Base for Staff's test year ending December 31,  
8 1985, updated for known and measurable changes through December 31, 1986.  
9 Included in this schedule are jurisdictional Plant-In-Service, less  
10 Reserve for Depreciation. This yields the net jurisdictional  
11 Plant-In-Service. Additions to net Plant-In-Service include both the  
12 direct and indirect pieces of Cash Working Capital, Materials and  
13 Supplies, and Prepayments as sponsored by Staff witness Brandel. Also  
14 included as part of Rate Base is the direct and indirect portion of Fuel  
15 Stock, sponsored by Staff witness Kuensting. Staff has deducted from Rate  
16 Base Income Taxes and Interest Expense relating to Cash Working Capital  
17 also sponsored by Staff witness Brandel. The final deduction from the  
18 Rate Base schedule is direct and indirect Deferred Income Taxes sponsored  
19 by Staff witness Featherstone.

20           Q. Please explain the direct and indirect pieces of the Rate  
21 Base schedule.

22           A. Items identified in the Rate Base schedule as "direct" are  
23 those rate base items which are related solely to the Company's utility  
24 steam heat business and as such are 100% directly assignable to the  
25 Company's jurisdictional utility steam heat rate base. Items identified  
26 in the rate base schedule as "indirect" are those items which are related  
27 to the Company's electric operations, meaning that only part of these  
28 items are being allocated to the Company's jurisdictional utility steam

1 heat rate base. For further explanation of the "direct" and "indirect"  
2 classifications refer to Staff witness Kuensting's testimony.

3 Q. Please explain Accounting Schedule 12.

4 A. Accounting Schedule 12 is the Staff's Income Statement. The  
5 first column of this schedule represents the revenues and expenses as  
6 recorded for Staff's test year on a Total Company basis. The second  
7 column represents the allocation factors utilized by the Staff to arrive  
8 at the steam heat jurisdictional amounts located in the third column. The  
9 fourth column represents Staff's jurisdictional adjustments. The fifth  
10 and final column represents Staff's adjusted steam jurisdictional income  
11 statement. The allocation factors used by Staff are contained in the  
12 prefiled direct testimony of Staff witness Kuensting.

13 Q. Would you please explain Accounting Schedule 13?

14 A. Yes. Accounting Schedule 13 - Adjustments to the Income  
15 Statement, is an itemized listing of Staff's Total Company adjustments to  
16 the Income Statement.

17 Q. Ms. White, what is Adjustment S-1.1?

18 A. Adjustment S-1.1 annualizes downtown commercial metered  
19 steam revenues.

20 Q. What are the components of a steam heat revenues?

21 A. There are three components of steam heat revenues. They are  
22 basic revenues, fuel adjustment revenues and gross receipts taxes (GRT).

23 Q. What are basic revenues?

24 A. Basic revenues are those revenues derived by the application  
25 of the appropriate tariffed rates per Mlb. to the steam usage in Mlbs.  
26 before fuel adjustment charges are considered. "Mlbs." is the  
27 abbreviation for thousand pounds and is the common unit of measurement for  
28 steam usage.

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1 Q. What are fuel adjustment revenues?

2 A. Fuel adjustment revenues are increases or decreases to the  
3 steam bill which result when the "fuel cost" used for generation varies  
4 above or below the tariffed level. Presently, the tariffed level is 116¢  
5 per million BTU (MMBTU) for Downtown customers. "Fuel cost" is defined in  
6 KCPL tariffs as the cost of fuel plus transportation, fuel handling  
7 expenses, and other miscellaneous fuel related expenses.

8 Q. What are Gross Receipts Taxes (GRT)?

9 A. Gross Receipts Taxes are taxes which the Company collects  
10 from their customers as a percentage add-on to the steam heat bill. At a  
11 later point in time, the Company remits these funds to the proper taxing  
12 authority.

13 Q. How has Staff annualized downtown commercial metered steam  
14 revenues?

15 A. This annualization of basic, billed revenues considers the  
16 elimination of revenues for those customers no longer receiving steam  
17 service, including the electric test boiler customers, as of December 31,  
18 1986. The annualization process also adjusts revenues to reflect the  
19 impact of the calendar adjustment, "normal" weather, and considers fuel  
20 adjustment revenues consistent with Staff's annualized fuel prices as  
21 addressed by Staff witness Kuensting. Gross Receipts taxes were  
22 eliminated in the annualization of revenues.

23 Q. Why has Staff made an adjustment for customers no longer  
24 receiving steam service from KCPL?

25 A. Staff removed those revenues associated with customers no  
26 longer receiving steam service as of December 31, 1986, in order to  
27 recognize for rate-making purposes a representative level of revenues that  
28 KCPL should expect to receive in the future.

1 Q. What is the significance of the lost steam customers in the  
2 pending case?

3 A. Lost customers and the associated decline in sales have had  
4 a significant impact on the deterioration of the Company's steam heat  
5 operations and have a significant impact on the revenue requirement in  
6 this case. As indicated by Company response to Staff Data Information  
7 Request No. 203, attached as Schedule 1, the Company has experienced a  
8 continual decline in customer levels since 1951 and a general decline in  
9 Mlbs. sold since 1970. Revenues have not followed the declining pattern  
10 due to the effects of Company's rate increases and the fuel adjustment  
11 revenues. Schedule 2 shows the customers that have discontinued steam  
12 service since January, 1981.

13 Q. Ms. White, why were the revenues attributable to the  
14 Electric Boiler Test Project removed from Staff's annualization of  
15 revenues?

16 A. Staff removed the revenues attributable to the test projects  
17 because each test project boiler operates on electricity, despite the fact  
18 that the Company currently bills these customers at steam rates based on  
19 Mlbs. used. It is Staff's opinion that revenues attributable to electric  
20 use and booked as steam revenues should not be considered in developing  
21 the steam revenue requirement because those customers have not actually  
22 been provided steam service by the Company.

23 Staff is recommending that these test project customers be  
24 treated as electric customers and that the associated revenues be treated  
25 as electric revenues. Staff witness Ratter discusses the rationale for  
26 treating customers with on-site electric boilers as electric customers in  
27 his testimony. Staff did not include in its calculation of revenue  
28 requirement any of the actual 1980 electric costs for the test project

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1 boilers which were included in test year expense nor did it include the  
2 plant investment associated with serving these test project customers.  
3 Therefore, it would not be proper to include the related revenues in  
4 Staff's revenue requirement.

5 Q. Please explain the purpose of Staff's calendar adjustment as  
6 it relates to the annualized revenue calculation.

7 A. The calendar adjustment matches steam revenues to the  
8 calendar month in which the steam usage actually occurred. Since the  
9 Company recognizes revenues as they are billed, this adjustment  
10 redistributes steam usage revenue from the month it was booked to the  
11 month it was actually used. This adjustment is necessary because Staff's  
12 weather data is based on calendar months. Therefore, actual steam usage  
13 during a calendar month can be matched with Staff's weather data for  
14 weather normalization purposes.

15 Q. What is "normal" weather?

16 A. "Normal" weather for purposes of Staff's annualization  
17 methodology is the thirty-year historical average of temperatures (or  
18 heating degree days) as reported in National Oceanic and Atmospheric  
19 Administration (NOAA) records for Downtown Kansas City.

20 Q. What is the intent of the weather normalization adjustment?

21 A. The weather normalization adjustment quantifies the  
22 additional revenues which would have been generated in a "normal" weather  
23 year where actual weather was warmer than "normal", or quantifies the  
24 excess revenues which would have been generated in a "normal" weather year  
25 where actual weather was colder than "normal". In this case, Staff's  
26 revenues have been increased through the weather adjustment because  
27 weather was warmer than normal during the test period.  
28



1 Q. Why has Staff calculated an adjustment for fuel adjustment  
2 revenue?

3 A. As stated earlier, the adjustment for fuel adjustment  
4 revenue is based on annualized "fuel cost" in relation to the fuel  
5 adjustment tariffed rates. The fuel adjustment included in Staff's  
6 annualization of revenues increases Staff's annualized revenues, meaning  
7 that Staff's annualized "fuel cost" exceeds the fuel adjustment tariffed  
8 rates. This is due to the Company using a total gas operation at Grand  
9 Avenue, with gas being more expensive than the previously used coal.

10 Q. Why has Staff removed GRT from test year revenues?

11 A. Removal of GRT from test year revenues allows restatement of  
12 booked revenues to basic revenues plus fuel adjustment. Staff eliminated  
13 these taxes because the Company acts only as a collecting agent for the  
14 taxing authorities. Therefore, collection of GRT does not affect revenue  
15 requirement.

16 Q. What is the purpose of Staff Adjustment S-2.1 for National  
17 Starch revenues?

18 A. Staff Adjustment S-2.1 computes the contribution margin  
19 revenues for National Starch. The contribution margin is calculated by  
20 annualizing National Starch sales and Corn Products Corporation (CPC)  
21 cancellation fees, less the annualization of National Starch fuel expense  
22 prepared by Staff witness Kuensting.

23 CPC significantly contributed to the Company's steam load when  
24 it began taking steam service in April, 1984. CPC subsequently sold its  
25 operations to National Starch in November, 1985. National Starch has a  
26 greatly reduced steam load in comparison to CPC, yet still produces a  
27 positive contribution to revenues. For further explanation of the CPC  
28 sale to National Starch, refer to Staff witness Oligschlaeger's testimony.

1           The purpose of making the National Starch contribution margin  
2 adjustment is to take into account the revenues net of fuel costs that  
3 National Starch sales contribute to the Company's total revenues.  
4 National Starch's contribution margin provides a positive contribution to  
5 the overall steam operations and allows for partial recovery of  
6 investments and operating costs attributable to the provision of steam  
7 service to the downtown customers. National Starch's contribution margin  
8 is important since, if it was not included in the calculation of revenue  
9 requirement, steam rates would be higher. Because of this, Staff believes  
10 it important to recognize the dollars National Starch contributes to the  
11 Company's steam operations.

12           Q. How did Staff annualize National Starch revenues?

13           A. Staff annualized National Starch revenues and CPC  
14 cancellation fees based on the twelve months ending December 31, 1986.  
15 The annualization was based on National Starch's actual bills for the year  
16 1986, except for the first two months of the year when National Starch had  
17 abnormally high sales due to the transition period at the manufacturing  
18 plant from CPC to National Starch. The annualization reflects both basic  
19 and fuel revenues for National Starch along with the annualized  
20 cancellation fee for CPC.

21           Q. What is the cancellation fee for CPC?

22           A. The CPC cancellation fee is a charge based upon a  
23 cancellation agreement between National Starch and ECPL dated November,  
24 1985. CPC cancelled their contract for steam supply with ECPL in 1985.  
25 When National Starch took over operation of the plant in December, 1985,  
26 it contracted with ECPL to pay the CPC cancellation fees.

27           Q. Ms. White, would you please explain Schedule 1, which is  
28 attached to your testimony?

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1           A. Yes. Schedule 3 shows how the contribution margin of  
2 \$2,446,864.00 was derived. These revenues attributable to National  
3 Starch are calculated by annualizing National Starch revenues and CPC  
4 cancellation fees less annualized fuel costs attributable solely to  
5 generation for serving the National Starch load.

6           Q. Has Staff performed an analysis of the composite historical  
7 steam rates per Mlb.?

8           A. Yes. Schedule 4 provides a historical comparison of average  
9 rates per Mlb. for downtown customers, CPC/National Starch as well as  
10 Total Company by year since 1980 including the results of Staff's revenue  
11 adjustments. The schedule shows that Staff's annualized level of revenues  
12 and Mlbs. for downtown customers derives a rate of \$12.45 (including GRT)  
13 per Mlb. of steam which is \$1.92 higher than the 1986 average rate of  
14 \$10.53. Schedule 4 also sets out revenue dollars, Mlbs. sold, and the  
15 percent increase or decrease from year to year in the composite Mlb. rate.  
16 Also contained in this schedule is the proforma dollars per Mlb.  
17 calculated by including the revenue requirement deficiency from this case  
18 with Staff's annualized revenues.

19           Q. Does this conclude your testimony on revenues?

20           A. Yes, it does.

21           Q. Would you please describe Accounting Schedule 4, Total  
22 Plant-In-Service?

23           A. Yes. Accounting Schedule 4 is a listing of the items that  
24 comprise Plant-In-Service for electric operations and steam heat  
25 operations. Electric Plant-In-Service is derived from the level of  
26 electric plant determined by the Commission in Case No. ED-83-185  
27 allocated down to steam heat. The plant allocations are being sponsored  
28 by Staff witness Kienitz. Accounting Schedule 4 also contains a listing

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1 of steam heat Plant-In-Service at December 31, 1985, updated through  
2 December 31, 1986, allocated at 100% steam heat.

3 Q. What is Accounting Schedule 5?

4 A. Accounting Schedule 5 - Adjustments to Plant-In-Service,  
5 represents an itemized listing of Staff's Total Company adjustments to  
6 Plant-In-Service.

7 Q. Please explain Accounting Schedule 14, Depreciation Expense.

8 A. Accounting Schedule 14 shows Staff's calculation for  
9 depreciation expense. Staff calculated depreciation expense by taking  
10 steam heat Plant-In-Service and applying current depreciation rates from  
11 the most recent order from the Commission approving depreciation rates for  
12 KCPL. This order, Depreciation Authority Order No. 148, was issued June  
13 9, 1986. The electric plant depreciation is derived from the level of  
14 electric plant determined by the Commission in Case No. EO-85-185  
15 allocated down to steam heat.

16 Q. Please explain Adjustment S-8.1.

17 A. Adjustment S-8.1 annualizes depreciation expense for the  
18 test year ending December 31, 1985 updated through December 31, 1986 based  
19 upon the most recent depreciation authority order mentioned above.

20 Q. What does Accounting Schedule 6 show?

21 A. Accounting Schedule 6 is a listing of the items used to  
22 determine depreciation reserve as of December 31, 1985, updated through  
23 December 31, 1986. It shows Total Company depreciation reserve allocated  
24 to steam heat.

25 Q. What is Accounting Schedule 7?

26 A. Accounting Schedule 7 - Adjustments to Depreciation Reserve  
27 represents an itemized listing of Staff's Total Company adjustments to  
28 Depreciation Reserve.

1 Q. Ms. White, please explain Staff Accounting Adjustments P-1.1  
2 and R-1.1.

3 A. Staff Accounting Adjustment P-1.1 is the disallowance to  
4 plant for the Test Project Electric Boiler equipment. Staff Accounting  
5 Adjustment R-1.1 is the disallowance to the related depreciation reserve  
6 for the Test Project Electric Boiler equipment.

7 Q. Why has Staff disallowed the costs of the electric boilers?

8 A. As previously mentioned, Staff believes the Test Project  
9 Electric Boilers should not be paid for by the Company, but by those  
10 customers who have elected to participate in KCPL's test project by having  
11 electric boilers installed as their heating source. By the very nature of  
12 this equipment it is obvious that electrical boilers and electrical  
13 resistance heating equipment owned by Company should be classified as  
14 electric Plant-In-Service. Therefore, Staff has removed the costs of  
15 these electric boilers from the Company's steam heat Plant-In-Service.  
16 Furthermore, Staff reserves the right to investigate this and all other  
17 electric plant additions made pursuant to the steam conversion plan in  
18 future rate cases.

19 Q. Ms. White, will Company have to upgrade their electrical  
20 system in order to accommodate additional load from the electric boilers  
21 it wishes to install on customer premises prior to implementation of its  
22 conversion plan?

23 A. Yes. Company has stated that "at least \$3 million of  
24 downtown electric distribution system construction" would have to be added  
25 to the electric system in order to carry out the conversion plan (KCPL  
26 Exhibit No. \_\_ (B/E), Schedule 1, sponsored by Beaudette). Staff has not  
27 made a thorough investigation of the additional plant that may be needed  
28 because it would involve costs associated with electric plant. Staff

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1 therefore reserves the right to examine any of those costs in any future  
2 KCPL electric rate case.

3 Q. Ms. White, would you please explain Accounting Adjustments  
4 P-2.1 and R-2.1?

5 A. Yes. Accounting Adjustment P-2.1 removes from steam  
6 plant-in-service capital costs associated with the relocation of steam  
7 distribution lines and mains related to the AT&T Pavilion construction  
8 project and other area construction projects. Accounting Adjustment R-2.1  
9 removes from reserve the related depreciation.

10 Q. Why is Staff making these Accounting Adjustments?

11 A. Staff believes that these relocation costs were necessitated  
12 by the AT&T construction project and other area construction projects  
13 which KCPL has since acquired as electric customers. Staff believes that  
14 AT&T and the other benefiting parties should have reimbursed KCPL 100% for  
15 the relocation costs. To the extent that the developers did not fully  
16 reimburse KCPL for these costs, Staff believes that at a minimum, the  
17 steam operation should have been reimbursed by the electric operation.  
18 KCPL has been partially reimbursed for this new plant by the developers  
19 for \$280,770 according to Company's response to Staff Data Information  
20 Request No. 456, attached as Schedule 5-1 through Schedule 5-3. Without  
21 reflecting these adjustments, Staff would be forcing steam customers to  
22 pay through rates depreciation and property tax expenses associated with  
23 plant that was reimbursed or should have been reimbursed by developers or  
24 the electric operation.

25 Q. Why does Staff assert that KCPL should have been fully  
26 reimbursed by AT&T and other benefiting parties for the relocation costs?

27 A. These costs were incurred as a direct result of downtown  
28 construction. To the extent the Company had to incur these capital

1 expenditures and the benefiting parties did not fully reimburse the steam  
2 operations, the electric operations should have reimbursed steam utility  
3 operations. As a result of KCPL's proposal to phase-out and discontinue  
4 steam heat service in the downtown area, Staff does not believe there is  
5 any inherent benefit to the steam utility system from this relocation.  
6 Since the benefiting parties are not steam customers, these projects  
7 provide no direct benefit to KCPL's steam utility operations.

8 Because Company wants to abandon its steam system, it is  
9 unlikely that it would have replaced this plant absent the relocation.  
10 Unless there is an emergency steam leak, the Company would not replace  
11 and/or relocate sections of this underground pipe.

12 Q. What is Accounting Adjustment S-5.2?

13 A. Accounting Adjustment S-5.2 disallows the costs contained in  
14 the test year ending December 31, 1985 for Energy Masters Corporation.  
15 Energy Masters is the consulting firm that KCPL hired to do energy audits  
16 for the Downtown steam customers to show them the best electric  
17 alternative to steam heat.

18 Q. Why did Staff disallow the costs associated with Energy  
19 Masters?

20 A. Staff has disallowed these costs because Staff believes that  
21 the energy audits performed for the customers are promotional in nature.  
22 Staff witness Ketter explains the promotional practices rule in detail.

23 Q. What are Accounting Adjustments S-3.3 and S-4.3?

24 A. Accounting Adjustments S-3.3 and S-4.3 eliminate operation  
25 and maintenance costs associated with the installation of the Test Project  
26 Electric Boilers. The elimination of these costs are for expenses  
27 incurred during Staff's test year ending December 31, 1985.

28 Q. Ms. White, please explain Staff Adjustment S-9.2.

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1 A. Staff Adjustment S-9.2 annualizes property tax expenses.

2 Q. How did Staff annualize property taxes?

3 A. Staff annualized property taxes by multiplying December 31,  
4 1986 depreciated Plant-In-Service balances by the statutory assessment  
5 ratio to derive the assessed value of the Plant-In-Service. Staff then  
6 multiplied the assessed value of Plant-In-Service by the property tax rate  
7 as of December 31, 1986.

8 Q. Ms. White, would you please explain Accounting Adjustment  
9 S-9.1?

10 A. Yes. Accounting Adjustment S-9.1 is to eliminate booked GRT  
11 included in Taxes Other Than Income. GRT is booked as a revenue with a  
12 corresponding expense entry to "Taxes Other Than Income". This adjustment  
13 eliminating GRT from Taxes Other Than Income corresponds to the earlier  
14 adjustment eliminating GRT from revenues. As stated earlier, the Company  
15 acts only as a collecting agent for these funds, meaning that GRT does not  
16 affect revenue requirement except to the extent of the effects of GRT in  
17 the cash working capital requirement. This will be discussed by Staff  
18 witness Brandel.

19 Q. Ms. White, would you please explain Accounting Schedule 17?

20 A. Yes. This is the Taxes Other Than Income Taxes schedule.  
21 It shows the total property taxes, GRT, FICA and unemployment  
22 compensation, allocated to steam heat. The levels of FICA and  
23 unemployment compensation are sponsored by Staff witness Brandel.

24 Q. Does this conclude your prefiled direct testimony?

25 A. Yes, it does.  
26  
27  
28



NOV 9 1986

WHITE-DIRECT

No. 303  
Class \_\_\_\_\_

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

Requested From: Mr. Steven Catron  
Date Requested: November 6, 1986  
Information Requested: Please provide data for the past 50 years  
for the following:

1. 10 psi steam

- Annual sendout
- Annual sales
- Annual losses

2. 100 psi steam

- Annual sendout
- Annual sales
- Annual losses

3. 185 psi steam

- Annual sendout
- Annual sales
- Annual losses

Requested By: Robert S. Miller - KDA Technology, Inc.

Information 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 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 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, recordings, correspondence and printed, typed or written materials of every 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.

Signed By:

OB Miller 2/5/87

Date Received: \_\_\_\_\_

# WHITTY-DIRECT

DATRE04  
DATRE03

DOWNTOWN STEAM DATA  
EXCLUDING NATIONAL STARCH  
(Steam delivered from GAS only at 165 p LBSSES

YEAR	REVENUE (\$)	MLBS	CUSTOMERS	SYSTEM INPUT MLBS	UNACCOUNTED FOR MLBS
1940	374674	344168	295	649222	86833
1941	335562	467683	290	583838	106746
1942	371524	314982	297	644862	113647
1943	442243	587819	381	712867	106558
1944	455344	532966	311	742165	123598
1945	488265	664188	329	810440	129311
1946	461525	609949	352	753384	129801
1947	654686	800655	376	943146	124740
1948	655576	741586	373	914827	153115
1949	684797	NA	NA	936787	142507
1950	697498	825752	384	972893	129571
1951	1049637	904983	385	1056560	134540
1952	1047672	792595	377	900996	93882
1953	958216	719453	375	849356	116194
1954	944415	636916	363	821985	110447
1955	983729	719563	358	822157	88859
1956	966356	711256	343	811998	85816
1957	1052952	771256	347	871952	85112
1958	1144243	829996	340	923841	85104
1959	1265423	844701	329	938639	89358
1960	1324539	870157	314	1009133	126278
1961	1255243	856954	301	981974	118644
1962	1237429	871672	300	985742	109837
1963	1165674	841138	296	972065	126235
1964	1171119	831617	292	958902	122781
1965	1194047	861171	285	1007283	142819
1966	1292859	968176	281	1114169	142558
1967	1321137	981215	274	1100875	119672
1968	1566995	1176756	281	1246924	63675
1969	1729432	1215377	278	1387294	167848
1970	1797983	1253016	283	1446163	179478
1971	1688084	1142181	276	1333842	205250
1972	1818063	1168988	275	1362415	185483
1973	1723883	1139651	268	1282228	79763
1974	1786834	882003	251	1144769	233387
1975	2467735	908328	252	1125881	198862
1976	2849167	967792	258	1139468	258588
1977	3488432	988424	248	1228829	288882
1978	3887828	963819	282	1252887	379462
1979	3411573	857813	218	1088728	417941
1980	3829443	833882	218	1084941	418878
1981	3844478	888718	288	923868	411888
1982	6381407	981141	179	988888	242448
1983	7078888	818883	179	888888	828888
1984	3888888	888888	188	888888	888888
1985	4888888	888888	188	888888	888888
1986	4888888	888888	188	888888	888888

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. HO-86-139

Customers That Have Discontinued Steam Service

April, 1981

Jones Store Company

April, 1982

Millis Holding Company

June, 1982

National Garage

December, 1982

K. C. Alterations

Bell General

Building Leasing Company

Israel Bettinger

January, 1983

Helping Hand

International Industries

February, 1983

W. T. Grant

Affiliated Realty Company

National Fidelity Life

Park College

Pebely Floral

Lane Bryant, Inc.

Meyers Jewelry Company

March, 1983

Continental Hotel Corp.

Brookfield Building

Tower Properties

Beacon Printing

April, 1983

Grand-McCee Auto

May, 1983

Robert Tureman

Mercantile Bank

November, 1983

First National Bank

Israel Bettinger

Boss Print

Churches Chicken

Wendy's

LAC Inc.

KANSAS CITY POWER & LIGHT COMPANY  
CASE NO. HO-86-139

Customers That Have Discontinued Steam Service

March, 1984

Harzfelds  
Worthas Inc.  
A & J Drug  
Edison Brothers Shoes  
Seventh Heaven  
S. S. Kresge Company  
Tower Properties  
Lerner Shoes  
Miller Wohl  
King Optical

June, 1984

Radio Shack

November, 1984

Metzner Stone Company

January, 1985

Pioneer Kitchen  
Stan Wisdom  
The Fish  
Gigi's  
George H. Weyer - 2 buildings

February, 1985

F.A.C. Inc.

March, 1985

Hassie Carter  
Grand Association Inc.

April, 1985

Ready Help  
Sunday School Board  
O & P Building, Inc.  
Nick Haywood  
Fantasy World  
Home Savings Association  
Penners Men's Wear

May, 1985

Waldheim's  
Missouri Comm. Partners of Illinois  
Lillie Holding Company  
Western Union  
Joseph Sibella

KANSAS CITY POWER & LIGHT COMPANY  
CASE NO. HO-86-139

Customers That Have Discontinued Steam Service

June, 1985

University Towers  
Bartco, Inc.  
Jaccard Jewelry Company

August, 1985

Royal Tower, Inc.  
Missouri Commercial - Illinois Ltd.  
Rosalin Webb

September, 1985

Western Adhesives

October, 1985

Federal Reserve Bank

November, 1985

Italian Gardens

December, 1985

Majestic Hotels & Inns  
H.R.L. Baltimore Company  
Columbia Properties  
Fairport Properties

January, 1986

H. T. Poindexter  
Ray Printing Company  
Commerce Bank

April, 1986

James B. Wutter Company

May, 1986

Huelbach Hotel

June, 1986

Barwood Am. Inc.  
Midland Building

WHITE-DIRECT

KANSAS CITY POWER & LIGHT COMPANY  
CASE NO. HO-86-139

National Starch Contribution Margin

National Starch Annualized Revenues	\$3,434,906
CPC Annualized Cancellation Fees	<u>1,302,564</u>
Total Annualized Revenues	\$4,737,470
Less: Annualized Fuel Expense (per Gary A. Kuensting)	<u>2,290,606</u>
National Starch Contribution	<u>\$2,446,864</u>

KANSAS CITY POWER AND LIGHT COMPANY  
CASE NO. HO-86-139

STEAM SALES AND REVENUES  
(Including GRT)

	Year	Mlbs	Revenues	Dollars per Mlb.	% Increase (Decrease)
<u>Overseas</u>	1980	633,682	\$ 3,620,436	\$ 5.71	---
	1981	502,779	3,848,474	7.65	33.98
	1982	616,285	6,301,121	10.22	33.59
	1983	618,053	7,072,824	11.44	11.94
	1984	537,898	5,805,331	10.79	(5.68)
	1985	545,222	4,888,649(1)	8.97	(16.87)
	1986	431,432	4,544,388(1)	10.53	17.39
	Staff's				
	Annualized	455,930	5,678,049(2)	12.45	18.23
<u>KCP/Regional Starch</u>	1983		108,000(3)	N/A	---
	1984	1,062,679	6,761,393(2)	6.36	---
	1985	1,310,786	8,563,931	6.53	2.67
	1986	547,164	5,897,940	10.78	65.08
	Staff's				
	Annualized	425,634	4,737,470	11.13	3.25
<u>Total</u>	1980	633,682	3,620,436	5.71	---
	1981	502,779	3,848,474	7.65	33.98
	1982	616,285	6,301,121	10.22	33.59
	1983	618,053	7,072,824	11.44	11.94
	1984	1,600,577	12,566,724	7.85	(31.38)
	1985	1,856,008	13,452,580	7.25	(7.64)
	1986	978,596	10,442,328	10.67	47.17
	Staff's				
	Annualized	881,564	10,415,519(2)	11.81	10.68
	Proforma	881,564	13,252,820(2)	15.03	27.27

(1) include test project electric on-site boilers: 1985 - \$9,782 1986 - \$38,970

(2) Staff's annualized revenues factored-up for 10% GRT. The additional revenues above Staff's annualized level have not been factored-up for 10% GRT.

(3) Penalty for not taking service on Operative Date.

(4) Does not include \$164,148 of revenue paid to KCPL as minimum payments for the first three months of 1984 as they were not yet taking service.

DEC 22 1986

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

Requested From: Steve CatronDate Requested: 12/19/86Information Requested: 1. Please provide documentation of costs incurred in relocating steam and electrical lines in relation to the AT & T constructions.2. When were the costs incurred?3. Where are these costs booked?4. Where is reimbursement for these costs booked?5. When did KCPL receive reimbursement for these costs?6. If KCPL has not received reimbursement to date, when will KCPL receive reimbursement?7. If KCPL will not receive reimbursement, why will it not receive reimbursement for these costs?Requested By: Ed Tooev

Information Provided: \_\_\_\_\_

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, 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. When 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 "documents" 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 phrase "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: \_\_\_\_\_

Date Received: 1/1/87





January 5, 1987

S. W. Cattron

RE: MPSC Data Information Request #486  
Docket No. HO-86-139

The above request contains 7 items related to the new AT&T Pavilion and are addressed individually below:

- #1. Please provide documentation of costs incurred in relocating steam and electrical lines in relation to the AT&T constructions.

Response:

Costs incurred to relocate the steam line amounted to \$416,520.79 and were made up as follows:

Material	\$ 22,290.68
Contract labor	325,750.91
KCPL labor w/load.	4,634.11
Transportation	352.50
Other	1,837.04
AFUDC	4,229.62
Engineering Costs	57,425.94

These costs were recorded in W/O #5-95592E which can be reviewed in Property Accounting if more in depth detail is necessary.

The costs to relocate the electric facilities were relatively minimal as the AT&T building took up most of the block and the previous buildings were served through the network system. However, costs were incurred to remove transformers from seven sidewalk vaults, which were abandoned due to the construction of the building. These costs have amounted to approximately \$13,375 and were recorded in W/O's #5-36000, 5-36022, and 5-36496.

- #2. When were the costs incurred?

Response:

The costs were incurred between February, 1984 and December, 1984.

- #3. Where are these costs booked?

Response:

The costs related to steam are recorded in Account 118.  
The costs related to electric are recorded in Account 108.

WHITE-DIRECT

#4. Where is the reimbursement for these costs booked?

Response:

The reimbursement of \$280,770 relating to steam relocation was recorded in Account 119.

#5. When did KCPL receive reimbursement for these costs?

Response:

The reimbursement was received in November, 1984.

#6. Not applicable due to response to #5.

#7. Not applicable due to response to #5.

If I can provide additional information, please contact me on extension 2765.



D. E. Summers  
Manager of Property Accounting  
and Customer Accounts

DES:cc