

Exhibit No.:
Issue: Depreciation of Plant
Witness: Jolie L. Mathis
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: HM-2004-0618
Date Testimony Prepared: October 14, 2004

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY SERVICES DIVISION

REBUTTAL TESTIMONY

OF

JOLIE L. MATHIS

**TRIGEN-KANSAS CITY ENERGY CORP. and
THERMAL NORTH AMERICA, INC.**

CASE NO. HM-2004-0618

*Jefferson City, Missouri
October 2004*

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

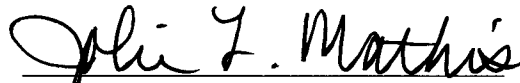
In The Matter of the Joint Application of Trigen-)
Kansas City Energy Corp. and Thermal North)
America, Inc. for the Authority Necessary for)
the Transfer of Control, and Sale of All Stock)
Currently Owned by Trigen Energy Corporation,)
Inc. to Thermal North America, Inc.)

Case No. HM-2004-0618

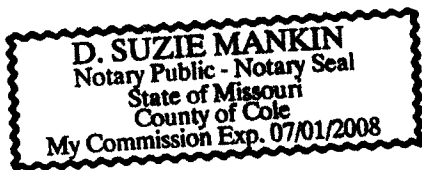
AFFIDAVIT OF JOLIE L. MATHIS

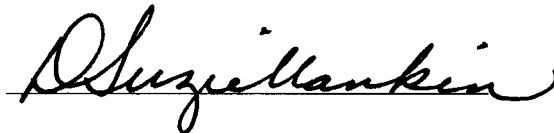
STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

Jolie L. Mathis, being of lawful age, on her oath states: that she has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of 3 pages to be presented in the above case; that the answers in the following Rebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of her knowledge and belief.


Jolie L. Mathis

Subscribed and sworn to before me this 13th day of October 2004.





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1 techniques, forecasting life, forecasting salvage and cost of removal and models for
2 analyzing both aged and unaged data.

3 Q. Have you previously filed testimony with the Commission?

4 A. Yes, I have. Attached as Schedule 1 to my rebuttal testimony is a list of cases
5 in which I have previously filed testimony.

6 Q. What is the purpose of your testimony in this case?

7 A. The purpose of my testimony is to make recommendations concerning the
8 transfer of Trigen-Kansas City Energy Corp's (Trigen KC) database, continuing property
9 records (CPRs) and property unit catalog to Thermal North America, Inc. (Thermal NA).
10 These recommendations should be viewed as conditions of the merger.

11 Q. What should the database contain?

12 A. The database should include, by plant account or sub-account:

- 13 1. Annual dollar additions and dollar retirements by vintage year and
14 year of retirement, beginning with the earliest year of data recorded;
- 15 2. Reserve for depreciation;
- 16 3. Surviving plant balance as of the study date; and
- 17 4. Annual gross salvage and cost of removal for the most recent 15 years.

18 Q. What should the CPR include?

19 A. The continuing property record should contain:

- 20 1. An inventory of property record units, including locations, which can
21 be readily checked for proof of existence;
- 22 2. The association of original costs with such property record units; and
- 23 3. The dates of installation and removal of plant.

1 Q. What should be contained in the property unit catalog?

2 A. The property unit catalog should contain a description of each retirement unit
3 used by the steam utility.

4 Q. What are your recommendations for Trigen KC and Thermal NA?

5 A. I believe the Commission should order Trigen KC and Thermal NA to:

6 1. Merge the CPRs of the pre-merged entities for use in depreciation
7 analysis and maintain CPRs by plant account and sub-account level for
8 the purposes of conducting future depreciation studies;

9 2. Maintain the depreciation reserve by primary account; and

10 3. Maintain in detail the database and property unit catalog.

11 Q. Does this conclude your rebuttal testimony?

12 A. Yes, it does.

**JOLIE MATHIS
CASE PARTICIPATION**

Date Filed	Issue	Case Number	Exhibit	Case Name
12/1/1995		TO96147	Direct	Alltel Missouri, Inc.
3/7/1996		GA96130	Rebuttal	Missouri Pipeline Company
3/7/1996		GA9711	Rebuttal	Missouri Pipeline Company
1/10/1997		GM9770	Rebuttal	Atmos Energy Corp. & United Cities Gas
6/26/1997		GR97272	Direct	Associated Natural Gas
5/13/1999 Depreciation of Plant		HR99245	Direct	St. Joseph Light & Power Company
6/25/1999 Depreciation		WR99326	Direct	United Water Missouri, Inc.
4/3/2000 Amortization of Premature Retirement		SR2000282	Direct	Missouri-American Water Company
4/3/2000 Amortization of Premature Retirement		WR2000281	Direct	Missouri-American Water Company
7/2/2001 Depreciation of Plant		EC20021	Direct	Union Electric Company d/b/a AmerenUE
12/6/2001 Depreciation of Plant		EC2002265	Direct	UtiliCorp United Inc. d/b/a Missouri Public Service
12/6/2001 Depreciation of Plant		ER2001672	Direct	UtiliCorp United Inc. d/b/a Missouri Public Service
1/22/2002 Depreciation of Plant		EC2002265	Surrebuttal	UtiliCorp United Inc. d/b/a Missouri Public Service
3/1/2002 Depreciation of Plant		EC20021	Direct	Union Electric Company d/b/a AmerenUE
6/24/2002 Depreciation - Net Salvage; Average Service Lives; Theoretical Reserve		EC20021	Surrebuttal	Union Electric Company d/b/a AmerenUE
4/15/2004 Depreciation		GR20040209	Direct	Missouri Gas Energy
6/14/2004 Depreciation Rates		GR20040209	Surrebuttal	Missouri Gas Energy