Exhibit No.:

Issues: Allocation Factors Witness: Erin L. Maloney

Sponsoring Party: MO PSC Staff

Type of Exhibit: True-Up Direct Testimony

File No.: ER-2010-0356

Date Testimony Prepared: February 22, 2011

MISSOURI PUBLIC SERVICE COMMISSION UTILITY OPERATIONS DIVISION

TRUE-UP DIRECT TESTIMONY

OF

ERIN L. MALONEY

KCP&L GREATER MISSOURI OPERATIONS COMPANY FILE NO. ER-2010-0356

Jefferson City, Missouri February 2011

**Denotes Highly Confidential Information **

NP

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the ApKCP&L Greater Missour Company for Approval to Changes in its Charges Service	Operations) Make Certain)	File No. ER-2010-0356	
AFF	IDAVIT OF ERIN L. MA	ALONEY	
STATE OF MISSOURI)) ss)		
Erin L. Maloney, of lawful age, on her oath states: that she has participated in the preparation of the following True-Up Direct Testimony in question and answer form, consisting of pages of True-Up Direct Testimony to be presented in the above case, that the answers in the following True-Up Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true to the best of her knowledge and belief.			
	Er.	Erin L. Maloney	
Subscribed and sworn to before	re me this 22 day of Fe	bruary, 2011.	
SUSAN L. SUNDERMEYER Notary Public - Notary Seal State of Missouri Commissioned for Callaway Cou My Commission Expires: October 03, Commission Number: 1094208	2014	an Jundermeye Notary Public	

1	TRUE-UP DIRECT TESTIMONY
2 3	OF
4 5	ERIN L. MALONEY
6 7	KCP&L GREATER MISSOURI OPERATIONS COMPANY
8 9	FILE NO. ER-2010-0356
10 11	
12	Q. Please state your name and business address.
13	A. My name is Erin L. Maloney. My business address is, P.O. Box 360,
14	Jefferson City, Missouri, 65102.
15	Q. Are you the same Erin L. Maloney who contributed to the Missouri Public
16	Service Commission Staff's (Staff) Cost of Service Report (Staff Report) filed on
17	November 17, 2010?
18	A. Yes.
19	Q. What is the purpose of your true-up testimony?
20	A. The purpose of this testimony is to present and briefly discuss the true-up
21	allocation factors provided to Staff witness V. William Harris for use in annualizing fuel
22	expense between MPS and L&P.
23	Q. What are the allocation factors that you recommend the Commission
24	adopt?
25	A. The Commission should adopt Staff's trued-up allocation factors of
26	** ** to L&P and ** ** to MPS for the purposes of allocating fuel costs
27	between L&P and MPS.
28	Q. Have the allocation factors shifted since Staff's direct filing and if so can
29	you explain the shift?



	True-Up Direct Testimony of Erin L. Maloney
1	A. Yes the allocation percentage assigned to L&P increased approximately
2	1.5% and likewise MPS's decreased approximately 1.5% due to the fact that L&P
3	experienced a higher rate of load growth than MPS between the end of the test year and
4	the true-up date.
5	Q. What megawatt amounts have been assigned to L&P and MPS from the
6	Iatan 2 generation plant for the purpose of re-calculating the allocation factors for this
7	true-up?
8	A. As in Staff's direct filing, Staff has assigned 65.36% (100 of 153 MWs) of
9	the available Iatan 2 generation to L&P and 34.64% (53 of 153 MWs) of the available
10	Iatan 2 generation to MPS.
11	Q. Does this conclude your true-up testimony?
12	A. Yes.