

Exhibit No.:
Witness: Maurice Brubaker
Type of Exhibit: Rebuttal Testimony
Issue: Rate Design
Sponsoring Parties: Industrials
Case No.: ER-2009-0089

**BEFORE THE PUBLIC SERVICE
COMMISSION OF THE STATE OF MISSOURI**

In the Matter of the Application of Kansas)
City Power and Light Company for)
Approval to Make Certain Changes in its) **Case No. ER-2009-0089**
Charges for Electric Service To Continue)
the Implementation of Its Regulatory Plan.)
_____)

Rebuttal Testimony of
Maurice Brubaker
on Rate Design Issues

On behalf of
NNSA
Ford Motor Company
Midwest Energy Users Association
Missouri Industrial Energy Consumers
Praxair, Inc.

March 17, 2009



Project 9050

**BEFORE THE PUBLIC SERVICE
COMMISSION OF THE STATE OF MISSOURI**

In the Matter of the Application of Kansas City Power and Light Company for Approval to Make Certain Changes in its Charges for Electric Service To Continue the Implementation of Its Regulatory Plan.))))))))	Case No. ER-2009-0089
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STATE OF MISSOURI)
)
COUNTY OF ST. LOUIS) **SS**

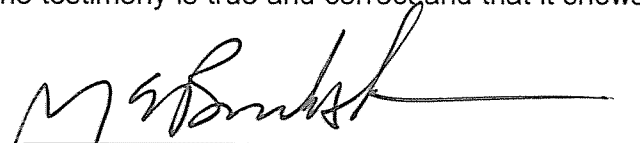
Affidavit of Maurice Brubaker

Maurice Brubaker, being first duly sworn, on his oath states:

1. My name is Maurice Brubaker. I am a consultant with Brubaker & Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by NNSA, Ford Motor Company, Midwest Energy Users Association, Missouri Industrial Energy Consumers and Praxair, Inc. in this proceeding on their behalf.

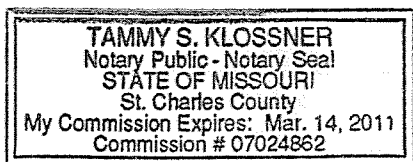
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony which was prepared in written form for introduction into evidence in the Missouri Public Service Commission Case No. ER-2009-0089.


3. I hereby swear and affirm that the testimony is true and correct and that it shows the matters and things that it purports to show.



 Maurice Brubaker

Subscribed and sworn to before me this 16th day of March, 2009.





 Notary Public

**BEFORE THE PUBLIC SERVICE
COMMISSION OF THE STATE OF MISSOURI**

_____)
In the Matter of the Application of Kansas)
City Power and Light Company for)
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Charges for Electric Service To Continue)
the Implementation of Its Regulatory Plan.)
_____)

Rebuttal Testimony of Maurice Brubaker

1 **Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A Maurice Brubaker. My business address is 16690 Swingley Ridge Road, Suite 140,
3 Chesterfield, Missouri 63017.

4 **Q ARE YOU THE SAME MAURICE BRUBAKER WHO HAS PREVIOUSLY FILED**
5 **TESTIMONY IN THIS PROCEEDING?**

6 A Yes. I have previously filed direct testimony on rate design issues on February 25,
7 2009. I have also filed rebuttal testimony on revenue requirement issues on
8 March 11, 2009.

9 **Q IS YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE OUTLINED IN**
10 **THAT TESTIMONY?**

11 A Yes. This information is included in Appendix A to my direct testimony on rate design
12 issues.

1 **Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?**

2 A I am appearing on behalf of NNSA, Ford Motor Company, Midwest Energy Users
3 Association, Missouri Industrial Energy Consumers and Praxair, Inc. (collectively
4 “Industrials”). These companies purchase substantial amounts of electricity from
5 Kansas City Power & Light Company (KCPL) and the outcome of this proceeding will
6 have an impact on their cost of electricity.

7 **Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

8 A To address the issue of interclass revenue allocations that have been expressed in
9 the testimony of other parties.

10 **Q WHAT ARE THE RECOMMENDATIONS OF OTHER PARTIES WITH RESPECT TO**
11 **THE ALLOCATION OF ANY RATE INCREASES AMONG CUSTOMER CLASSES?**

12 A All parties who have filed testimony have taken the position that an equal percentage
13 increase should be applied across classes to distribute the allowed revenue increase.

14 **Q HAVE THE PARTIES FILED THE RESULTS OF CLASS COST OF SERVICE**
15 **STUDIES?**

16 A Yes. Various parties have filed the results of class cost of service studies, but no
17 party is recommending that the results of the class cost of service studies which they
18 have filed be used to determine the allocation of revenues among customer classes
19 in this case.

1 **Q DO YOU AGREE WITH THE CLASS COST OF SERVICE STUDIES PRESENTED**
2 **BY OTHER PARTIES?**

3 A No, I do not. However, because no party is recommending use of a class cost of
4 service study to allocate revenues among customer classes in this case, the record
5 would not be served by rebuttal testimony on the specifics of those cost of service
6 studies.

7 The fact that I am not addressing the particulars of class cost of service
8 studies filed by other parties is simply for the practical reason that nobody
9 recommends using them. The fact that I have not addressed the specific issues and
10 disagreements I have with these class cost of service studies should not be
11 interpreted to mean that I believe that they are properly performed and reliable.

12 **Q DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

13 A Yes, it does.

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