Exhibit No.:

Materials and Supplies Issues:

Witness: Bret G. Prenger MoPSC Staff

Sponsoring Party: Type of Exhibit: Surrebuttal Testimony

ER-2009-0089 Case No.:

April 7, 2009 Date Testimony Prepared:

MISSOURI PUBLIC SERVICE COMMISSION **UTILITY SERVICES DIVISION**

SURREBUTTAL TESTIMONY

OF

BRET G. PRENGER

Great Plains Energy, Incorporated KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2009-0089

Jefferson City, Missouri **April 2009**

1	SURREBUTTAL TESTIMONY
2	OF
3	BRET G. PRENGER
4	KANSAS CITY POWER AND LIGHT COMPANY
5	CASE NO. ER-2009-0089
6	Q. Please state your name and business address.
7	A. Bret G. Prenger, Fletcher Daniels State Office Building, Room G8,
8	615 East 13 th Street, Kansas City, Missouri 64106.
9	Q. Are you the same Bret G. Prenger who previously filed direct testimony in this
10	proceeding?
11	A. Yes. I also provided input into Staff's Cost of Service Report for Kansas City
12	Power & Light Company (KCPL) filed on February 11, 2009 in case ER-2009-0089.
13	I also provided input into Staff's Cost of Service Report in the KCPL Greater Missouri
14	Operations Company (GMO) on February 13, 2009.
15	Q. What is the purpose of your surrebuttal testimony in this proceeding?
16	A. The purpose of my testimony is to discuss the rebuttal testimony of
17	John Weisensee with regard to the costs of materials and supplies. Company and Staff
18	disagree on the correct methodology for calculating the costs of materials and supplies for
19	inclusion in KCPL's Cost of Service. I will discuss the position the Company feels is the
20	correct methodology, address the weakness with that methodology and also discuss how
21	Staff believes materials and supplies should be calculated.
22	Q. What method has KCPL used for the costs of materials and supplies for
23	inclusion in KCPL's cost of service?

- A. Company witness John Weisensee states on page 18 of his rebuttal testimony that Company believes the most current balance should be used for the costs of materials and supplies. Mr. Weisensee provides an example of the methodology used by the Company within his attached Schedule, JPW-5. This approach used the ending balances for materials and supplies as the basis of the amount to include in rate base. Staff disagrees with this approach.
 - Q. Why does Staff disagree with the Company's approach?
- A. Staff believes the Company's approach is inappropriate because within many of the materials and supplies' accounts there is no distinguishable trend resulting in an overstatement of the balances that fluctuate. Several of the accounts do not show an upward trend as KCPL's position would indicate. I have provided a Schedule, BGP-1 that shows the past 18 months of each individual account balances for materials and supplies. Along with the balance, an account "Summary"/Analysis is also provided. When reviewing these accounts, one can see that the balances of some of the accounts have an upward trend over time while other accounts do not. Staff examined each account for a period of several years and made a separate determination for each account of what the appropriate level is to include in KCPL's rate base. A more accurate depiction of the movement is shown by using the current 18 months. Several of these accounts have shown either a fluctuation or have recently begun a decreasing trend. Staff believes the most appropriate rate base amount would be shown by reviewing each individual materials and supplies account.
 - Q. What was the position Staff presented in its direct case?
- A. Staff took a 13-month average of the total materials and supplies as the amount that should be included in rate base.

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- Q. Has Staff modified its position regarding materials and supplies?
- A. Yes. Staff has modified its position by looking at each individual account and determining the proper basis for each individual account. In some instances a 13-month average is appropriate based on account activity. In other cases, since the account experienced either an upward or downward trend, the last known level was used. Still others, an average shorter or longer than 13 months were used because while there was an upward trend, the accounts still fluctuated.
 - Q. Why has Staff modified its position from the Direct Filing?
- A. Staff reviewed the rebuttal testimony of Mr. Weisensee and considered his concerns where appropriate. Staff examined the individual accounts for materials and supplies and determined in some instances, KCPL's concerns about using an end of period value for increasing accounts was valid and so reflected this position in Staff's analysis. However; in reviewing the individual materials and supplies accounts, Staff believes that there were sufficient differences in those accounts to warrant not using an end of period balance in all instances. Staff believes an average should be used in those balances which represented a fluctuation. There were even some accounts where a downward trend was exhibited. Staff reflected that trend by using an end of period level. At this stage of the analysis, Staff is using the most recent data available from the January, 2009 levels. This is in contrast to the September, 2008 cutoff that was used by Staff in the Direct case, and Mr. Weisensee in his rebuttal testimony. Since there will be a true-up period that will consist of either a March 31, 2009 or April 30, 2009 cutoff, Staff feels using the latest January, 2009 balances is more beneficial than using the September cutoff. Staff will examine materials and supplies in the true-up period and make any modifications deemed appropriate

by using the same proposed methodologies in this surrebuttal. Staff will examine each individual account to determine the amounts to be assigned for materials and supplies Rate Base.

- Q. Did the Companies (KCPL/GMO) ever discuss the issue of materials and supplies with the Staff?
- A. No. KCPL/GMO did not bring any concerns regarding materials and supplies to Staff at any time since Staff filed its direct case on February 11 and 13, 2009. There was never a time that KCPL/GMO made Staff aware of any differences they had with the level of materials and supplies Staff included in its cases. It was not until Staff saw the Company's rebuttal testimony that Staff became aware of the concerns that KCPL had with the level of materials and supplies that was included in rate base. This is the type of issue that is typically addressed between the parties and usually the differences can be resolved.

Had Company approached Staff regarding the differences it had with the direct position taken by the Company and Staff could likely have been resolved.

- Q. Does that conclude your surrebuttal testimony?
- A. Yes, it does.

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
AFFIDAVIT OF BRET G. PRENGER
STATE OF MISSOURI) ss. COUNTY OF COLE)
Bret G. Prenger, of lawful age, on his oath states: that he has participated in the preparation of the foregoing Surrebuttal Testimony in question and answer form, consisting of $\frac{4}{\text{four}}$ pages to be presented in the above case; that the answers in the foregoing Surrebutta Testimony were given by him; that he has knowledge of the matters set forth in such answers and that such matters are true and correct to the best of his knowledge and belief.
But y. Tunger Bred G. Predger
Subscribed and sworn to before me this day of April, 2009.
NIKKI SENN Notary Public - Notary Seal State of Missouri Commissioned for Osage County My Commission Expires: October 01, 2011 Commission Number: 07287016 Notary Public

KANSAS CITY POWER LIGHT CASE NO. ER-2009-0089

M&S MONTHLY ACCOUNT BALANCE

1545-00							Mes	MONT	TLY AC	COUNT	BALAN	ICE						
Marcial Marc	Material and Sup	•																
14-10 14-15 15-1		Sep-07	Oct-07	Nov-07	Dec-07	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08'	Nov-08'	Dec-08'	Jan-09'
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154400				_		\$40.811	\$41.809	\$40.827	\$41.142	\$42.340	\$44,145	\$44.695	\$48.092	\$42,923	\$41.390	\$41,747	\$39.506	
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154553	154540	LAST MO	NTH ENDI	NG BALAN	CE USED													\$6,615,829
15455 LAST MONTH ENDING BLANCE USED LAST MONTH ENDING BL	154550	LAST MO	NTH ENDI	NG BALAN	CE USED													\$6,086,176
154570 LAST MONTH ENDING BALANCE USED LAST MONTH ENDING BALAN	154553	LAST MO	NTH ENDI	NG BALAN	CE USED													(\$730,341)
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154610 1	154570	LAST MO	NTH ENDI	NG BALAN	CE USED													\$18,194,434
154610	154576	LAST MO	NTH ENDI	NG BALAN	CE USED													(\$9,097,217)
54620 \$84,198 \$42,962 \$58,959 \$45,105 \$27,612 \$33,368 \$68,974 \$12,034 \$119,989 \$82,747 \$98,219 \$98,461 \$80,496 \$96,496 \$96,4	154581	LAST MO	NTH ENDI	NG BALAN	CE USED													\$22,068,976
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154650 \$27,542 \$26,492 \$30,853 \$29,972 \$25,504 \$22,201 \$22,202 \$18,724 \$71,181 \$41,915 \$38,694 \$57,082 \$44,877 \$25,798 \$37,331 \$26,163 \$24,786 \$15,466		\$22,797	\$38,235	\$47,976	\$32,219	\$32,776	\$21,327	\$26,801	\$29,399	\$31,971	\$40,388	\$25,960	\$34,027	\$16,694	\$29,652	\$16,413	\$22,591	\$27,977
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154661 154662 16370 163020 163100 163210 163200 163		\$27,542	\$26,492	\$30,853	\$29,927	\$25,504	\$22,621	\$22,250	\$18,724	\$71,181	\$41,915	\$38,694	\$57,082	\$44,877				\$24,786
154662															\$1,922			
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154201 (\$89,629) (\$90,666) (\$72,420) (\$59,318) (\$82,743) (\$88,575) (\$78,256) (\$83,633) (\$80,250) (\$46,801) (\$53,274) (\$48,236) (\$54,471) (\$66,787) (\$67,633) (\$84,876) (\$88,611) (\$1,620 (\$11,852) (\$15,740) (\$15,403) (\$15,403) (\$10,493) (Sep-07	Oct-07	Nov-07	Dec-07	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08'	Nov-08'	Dec-08'	Jan-09'
154202 154203 154210 LAST MONTH ENDING BALANCE USED (\$15,740) (\$15,740) (\$15,403) (\$10,269) \$164,486	154200	LAST MO	NTH ENDI	NG BALAN	CE USED													\$311,648
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	154211	(\$32,572)	(\$51,382)	(\$45,315)	(\$48,061)	(\$56,564)	(\$66,496)	(\$73,590)	(\$42,845)	(\$63,104)	(\$76,793)	(\$83,299)	(\$73,242)	(\$67,561)	(\$75,970)	(\$70,722)	(\$67,808)	(\$56,811)

KANSAS CITY POWER LIGHT CASE NO. ER-2009-0089 M&S NEW ACCOUNT AMOUNT

Material and Supplies Accounts

A	ccount Descr	New Amount based on 18 month information	
154100	M&S Deposit on Reels	\$376,800.00	LAST MONTH ENDING BALANCE USED
154101	M&S Deposit on Drums	\$20.00	LAST MONTH ENDING BALANCE USED
154102	M&S Deposits for Containers	\$0.00	LAST MONTH ENDING BALANCE USED
154310	M&S Substation Spare Parts	\$3,143,358.23	18 MONTH AVERAGE
154320	M&S F&M Central Stores	\$7,225,434.33	18 MONTH AVERAGE
154326	M&S Emergency Restoration Mtrl	\$736,478.00	LAST MONTH ENDING BALANCE USED
154330	M&S Northland Service Center	\$43,407.16	18 MONTH AVERAGE
154340	M&S Dodson Service Center	\$31,368.42	18 MONTH AVERAGE
154362	M&S Marshall Service Center	\$146,458.01	18 MONTH AVERAGE
154370	M&S Southland Service Center	\$380,358.99	18 MONTH AVERAGE
154380	M&S Johnson Co Service Center	\$41,767.00	LAST MONTH ENDING BALANCE USED
154390	M&S Paola Service Center	\$227,205.00	LAST MONTH ENDING BALANCE USED
154396	M&S Ottawa Service Center	\$41,341.97	18 MONTH AVERAGE
154400	M&S Inter Plant Transfers	(\$9,948.06)	18 MONTH AVERAGE
154401	M&S Inter Unit Transfers	(\$25,205.00)	LAST MONTH ENDING BALANCE USED
154510	M&S CT Maintenance	\$2,558,151.00	LAST MONTH ENDING BALANCE USED
154530	M&S Hawthorn Power Station	\$10,130,355.00	LAST MONTH ENDING BALANCE USED
154540	M&S Montrose Power Station	\$6,615,829.00	LAST MONTH ENDING BALANCE USED
154550	M&S latan Power Station	\$6,086,176.00	LAST MONTH ENDING BALANCE USED
154553	M&S latan-EDE	(\$730,341.00)	LAST MONTH ENDING BALANCE USED
154555	M&S latan - SJLP	(\$1,095,512.00)	LAST MONTH ENDING BALANCE USED
154570	M&S LaCygne Power Station	\$18,194,434.00	LAST MONTH ENDING BALANCE USED
154576	M&S LaCygne-WR	(\$9,097,217.00)	LAST MONTH ENDING BALANCE USED
154581	M&S Wolf Creek Station	\$22,068,976.00	LAST MONTH ENDING BALANCE USED
154610	M&S Veh Fuel Warrensburg	\$2,866.75	4 MONTH AVERAGE
154620	M&S Veh Fuel-F&M	\$71,791.05	18 MONTH AVERAGE
154630	M&S Veh Fuel Northland	\$27,622.31	18 MONTH AVERAGE
154640	M&S Veh Fuel Dodson	\$34,456	18 MONTH AVERAGE
154650	M&S Veh Fuel Johnson County	\$31,763.47	18 MONTH AVERAGE
154660	M&S Veh Fuel St.Joe	\$1,881.50	4 MONTH AVERAGE
154661	M&S Veh Fuel Lee's Summit	\$2,656.67	3 MONTH AVERAGE
154662	M&S Veh Fuel Belton	\$4,771.00	LAST MONTH ENDING BALANCE USED
154670	M&S Veh Fuel Southland	\$41,029.53	6 MONTH AVERAGE
163020	Stores Expense Undistributed	(\$855,589.20)	7 MONTH AVERAGE
163100	Stores Exp Undist-Wolf Crk	\$148,453.00	LAST MONTH ENDING BALANCE USED
163200	Stores Exp Undis-Production	\$344,209.72	8 MONTH AVERAGE
163210	Stores Exp - PPV - Prod	(\$17,706.50)	7 MONTH AVERAGE
163250	Stores Exp -Misc Voucher Items	\$73,711.71	7 MONTH AVERAGE
163300	Stores Exp Undis-T & D	\$650,800.20	7 MONTH AVERAGE
163310	Stores Exp - PPV -T&D	\$182,203.93	7 MONTH AVERAGE
163320	Inventory Adjustments	(\$2,590.49)	_7 MONTH AVERAGE
	Total	\$67,832,026	

KANSAS CITY POWER LIGHT CASE NO. ER-2009-0089 M&S NEW ACCOUNT AMOUNT

Fuel Accounts

Account	Descr		
154200	Fuel Additive-Limestone	\$311,648.00	LAST MONTH ENDING BALANCE USED
154201	Fuel Additive-Limestone-KGE	(\$68,550.51)	18 MONTH AVERAGE
154202	Fuel Additive-Lime-SJLP	(\$14,331.67)	3 MONTH AVERAGE
154203	FuelAdditive-Limestone-EDE	(\$9,554.33)	3 MONTH AVERAGE
154210	Fuel Additive-Ammonia	\$164,486.00	LAST MONTH ENDING BALANCE USED
154211	Fuel Additive-Ammonia-KGE	(\$58,451.96)	18 MONTH AVERAGE
	Total	\$325,246	

