Exhibit No.: Issue: Phase-In Carrying Costs Witness: Tim M. Rush Type of Exhibit: Direct Testimony Sponsoring Party: KCP&L Greater Missouri Operations Company Case No.: ER-2012-0024 Date Testimony Prepared: October 21, 2011

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2012-0024

DIRECT TESTIMONY

OF

TIM M. RUSH

ON BEHALF OF

KCP&L GREATER MISSOURI OPERATIONS COMPANY

Kansas City, Missouri October 2011

DIRECT TESTIMONY

OF

TIM M. RUSH

Case No. ER-2012-0024

- Q: Please state your name and business address.
 A: My name is Tim M. Rush. My business address is 1200 Main Street, Kansas City,
 Missouri 64105.
 - 4 Q: By whom and in what capacity are you employed?
 - 5 A: I am employed by Kansas City Power & Light Company ("KCP&L") as Director,
 6 Regulatory Affairs.
 - 7 Q: What are your responsibilities?

A: My general responsibilities include overseeing the preparation of the rate case, class cost
of service and rate design of both KCP&L and KCP&L Greater Missouri Operations
Company ("GMO" or "Company"). I am also responsible for overseeing the regulatory
reporting and general activities as they relate to the Missouri Public Service Commission
("MPSC" or "Commission").

13 Q: Please describe your education, experience and employment history.

A: I received a Master of Business Administration degree from Northwest Missouri State
University in Maryville, Missouri. I did my undergraduate study at both the University
of Kansas in Lawrence and the University of Missouri in Columbia. I received a
Bachelor of Science degree in Business Administration with a concentration in
Accounting from the University of Missouri in Columbia.

1 Q: Please provide your work experience.

2 A: I was hired by KCP&L in 2001 as the Director, Regulatory Affairs. Prior to my 3 employment with KCP&L, I was employed by St. Joseph Light & Power Company 4 ("Light & Power") for over 24 years. At Light & Power, I was Manager of Customer 5 Operations from 1996 to 2001, where I had responsibility for the regulatory area, as well 6 as marketing, energy consultant and customer services area. Customer services included 7 the call center and collections areas. Prior to that, I held various positions in the Rates 8 and Market Research Department from 1977 until 1996. I was the manager of that 9 department for fifteen years.

10 Q: Have you previously testified in a proceeding before the MPSC or before any other 11 utility regulatory agency?

- A: I have testified on several occasions before the MPSC on a variety of issues affecting
 regulated public utilities. I have additionally testified at the Federal Energy Regulatory
 Commission and the Kansas Corporation Commission.
- 15 Q: V

): What is the purpose of your testimony?

- 16 A: My testimony provides support for the Stipulation and Agreement ("Stipulation")
 17 between the Staff and the Company filed in this case.
- 18 Q: Did you supervise the preparation of the tariffs attached as Exhibit A to the19 Stipulation?
- 20 A: Yes.
- 21 Q: What does Exhibit A reflect?
- A: Exhibit A contains three sets of tariffs that implement the phase-in of rates ordered by the
 Commission in File No. ER-2010-0356 for GMO's Light & Power ("L&P") division.

The tariffs have a June 25, 2012, June 25, 2013 and June 25, 2014 effective date respectively and reflect a carrying cost rate of 3.25% as contained in the Stipulation.

The amount of rate increase reflected by these tariffs for June 25, 2012 is a \$11,756,983 increase above the June 25, 2011 tariffs, which reflect the phase-in rate increase of one half of the difference between \$29,772,796 and \$22,101,088 (\$3,835,854), the deferred revenue during the period June 25, 2011 through June 24, 2012 (\$7,671,708) and the carrying costs agreed to in the stipulation and agreement (3.25%) on the deferred revenue of \$7,671,708 (\$249,331).

In order to effectuate the June 25, 2013 phase, the tariffs reflect a rate decrease of
\$124,665 below the June 25, 2012 tariffs. These tariffs reflect the remaining phase-in rate
increase of one half of the difference between \$29,772,796 and \$22,101,088
(\$3,835,854), the deferred revenue during the period June 25, 2012 through June 24,
2013 (\$3,835,854) and the carrying costs (3.25%) on the deferred revenue of \$3,835,854
(\$124,665). This increase is offset by the reversal of the prior year's deferred revenues
and the prior year's carrying costs.

In order to complete the phase-in, L&P revised tariffs reflect an effective date of
June 25, 2014. The amount of rate decrease reflected by these tariffs is \$3,960,519.
These tariffs complete the phase-in and establish L&P's rates at \$29,772,796 (the amount
of the L&P rate increase as ordered prior to any phase-in).

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Q: Do you have any schedules supporting these calculations?

A: Yes. Schedule TMR-1, attached to my testimony provides the worksheet used to
compute the phase-in rate increases used in developing the tariffs attached to the
Stipulation and Agreement as Exhibit A. Also included in Schedule TMR-1 are three

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- 1 pages demonstrating the class rate increases for each of the phase-in years. As can be
- 2 seen on in this schedule, the increases/decreases reflected in the phase-in are an increase
- 3 of 7.274% in 2012, a decrease of .072% in 2013 and a decrease of 2.286% in 2014.
- 4 Q: Does that conclude your testimony?
- 5 A: Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Determination of Carrying Costs for the Phase-In Tariffs of KCP&L Greater Missouri Operations Company

Case No. ER-2012-0024

AFFIDAVIT OF TIM M. RUSH

STATE OF MISSOURI)) COUNTY OF JACKSON)

) ss

Tim M. Rush, being first duly sworn on his oath, states:

1. My name is Tim M. Rush. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Director, Regulatory Affairs.

(-4) pages, having been prepared in written form for introduction into evidence in the abovecaptioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

l'im M. Rush

Subscribed and sworn before me this 215^{-1} day of October, 2011.

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My commission expires: Feb. N. 2015

NICOLE A. WEHRY
Notary Public - Notary Seal
Notary Public - Notary Coal
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Schedule TMR-1 (1 of 4)

ER-2012-0024 KCP&L GMO L&P Phase In

	6/25/2011	6/25/2012	6/25/2013	6/25/2014
Total Revenue Requirement	29,772,796			
Rate Increase	22,101,088	22,101,088	33,857,981	
65A - Remaining increase phased in in equal parts		3,835,854	3,835,854	
65B - Revenue which would have allowed in the absence of a 6-25-2011 through 6-24-2012 6-25-2012 through 6-24-2013	phase in	7,671,708	(7,671,708) 3,835,854	
Carrying Costs 6-25-2011 through 6-24-2012 6-25-2012 through 6-24-2013		249,331	(249,331) 124,665	
Total Rate Increase	-	33,857,981	33,733,315	
Rate Decrease Authorized Increase	=			3,960,519 29,772,796
Total revenue excluding carrying cost Total carrying cost				
Total revenue including carrying cost				
Calculation of Carrying costs	6/25/11 to 6/24/2012	6/25/12 to 6/24/2013		
Deferred Revenues	7,671,708	3,835,854		
Return on Rate Base	3.25% 249,331	3.25% 124,665		
Base Revenues	139,545,332			
Total revenue increase if no phase-in (excl. carrying cost)	29,772,796	29,772,796	29,772,796	29,772,796
Rate Increase		11,756,893	(124,665)	(3,960,519)
Starting Base Revenues	139,545,332	7.274% 161,638,419	-0.072% 173,395,312	-2.286% 173,270,646
Ending Base Revenues	161,638,419	173,395,312	173,270,646	169,310,127
				7,671,708

SCHEDULE TMR-1 (2 of 4)

SUMMARY OF KWH SALES AND REVENUES KCPL-GMOC - L&P ELECTRIC MO PSC CASE NO. ER-2012-0024 - Phase In - Phase 1

		kWh	ER-2010-0356 Revenue	Post ER-2010- 0356 Revenue	Phase 1 Increase	Proposed Phase 1 Revenue	
	Residential Total Residential	791,740,502	60,895,912	70,599,904	5,135,138	75,735,042	7.274%
	Small General Service Total Small GS	105,716,147	10,568,436	12,136,129	882,731	13,018,860	7.274%
	Large General Service Total Large GS	382,945,834	24,882,762	28,823,567	2,096,504	30,920,071	7.274%
	Large Power Service Total LPS	810,019,714	39,953,912	46,320,689	3,369,170	49,689,859	7.274%
MOSJx	Lighting Metered Street & Private Area Lighting Total Lighting	20,506,149 22,206,275	114,350 3,129,960 3,244,310	132,449 3,625,681 3,758,130	9,634 263,717 273,350	142,083 3,889,398 4,031,480	7.274% 7.274%
			139,545,332	161,638,419	11,756,893	173,395,312	7.274%

SCHEDULE TMR-1 (3 of 4)

SUMMARY OF KWH SALES AND REVENUES KCPL-GMOC - L&P ELECTRIC MO PSC CASE NO. ER-2012-0024 - Phase In - Phase 2

		kWh	ER-2010-0356 Revenue	Phase 1 Final Revenue	Phase 2 Increase	Proposed Phase 2 Revenue	
	Residential Total Residential	791,740,502	60,895,912	75,734,618	(54,451)	75,680,167	-0.072%
	Small General Service Total Small GS	105,716,147	10,568,436	13,018,763	(9,360)	13,009,403	-0.072%
	Large General Service Total Large GS	382,945,834	24,882,762	30,920,020	(22,230)	30,897,790	-0.072%
	Large Power Service Total LPS	810,019,714	39,953,912	49,689,698	(35,725)	49,653,973	-0.072%
MOSJx	Lighting Metered Street & Private Area Lighting Total Lighting	1,700,126 20,506,149 22,206,275	114,350 3,129,960 3,244,310	142,081 3,889,398 4,031,479	(102) (2,796) (2,899)	141,979 3,886,602 4,028,581	-0.072% -0.072%
			139,545,332	173,394,578	(124,665)	173,269,913	-0.072%

SCHEDULE TMR-1 (4 of 4)

SUMMARY OF KWH SALES AND REVENUES KCPL-GMOC - L&P ELECTRIC MO PSC CASE NO. ER-2012-0024 - Phase In - Phase 3

		kWh	ER-2010-0356 Revenue	Phase 2 Final Revenue	Phase 3 Increase	Proposed Phase 3 Revenue	
	Residential Total Residential	791,740,502	60,895,912	75,680,074	(1,729,864)	73,950,210	-2.286%
	Small General Service Total Small GS	105,716,147	10,568,436	13,009,347	(297,362)	12,711,985	-2.286%
	Large General Service Total Large GS	382,945,834	24,882,762	30,897,429	(706,241)	30,191,188	-2.286%
	Large Power Service Total LPS	810,019,714	39,953,912	49,653,903	(1,134,968)	48,518,935	-2.286%
MOSJx	Lighting Metered Street & Private Area Lighting Total Lighting	1,700,126 20,506,149 22,206,275	114,350 3,129,960 3,244,310	141,973 3,886,602 4,028,575	(3,245) (88,838) (92,084)	138,728 3,797,764 3,936,491	-2.286% -2.286%
			139,545,332	173,269,328	(3,960,519)	169,308,809	-2.286%