

<b>Exhibit No.:</b>	
<b>Issues:</b>	<i>Records Retention</i>
<b>Witness:</b>	Herman Schopman
<b>Sponsoring Party:</b>	Trigen-Kansas City Energy Corporation
<b>Type of Exhibit:</b>	Surrebuttal Testimony
<b>Case No.:</b>	HM-2004-0618
<b>Date Testimony Prepared:</b>	November 8, 2004

**MISSOURI PUBLIC SERVICE COMMISSION  
UTILITY OPERATIONS DIVISION**

**SURREBUTTAL TESTIMONY  
OF  
HERMAN SCHOPMAN**

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

**CASE NO. HM-2004-0618**

**November 2004**

Joint Application of )  
 )  
**Trigen-Kansas City Energy Corp.** )  
 )  
and ) Case No. HM-2004-0618  
 )  
**Thermal North America, Inc.** )  
 )  
For Grant of 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. )

STATE OF \_\_\_\_\_ )  
 ) ss  
COUNTY OF \_\_\_\_\_ )

Notary Public



1 company that at that time was known as Philadelphia Thermal Energy Corporation, as a  
2 Project Engineer. In 1989 I became its Manager of Plant Engineering and Maintenance, in  
3 1997 its Vice President Operations and in 2000 I was designated as its President. As a result  
4 of organizational changes within Trigen Energy, my title at Trigen- Philadelphia was  
5 changed to Vice President in 2002. In 2002 I also was named Senior Vice President Steam  
6 Plant Operations of Tractebel Power, Inc.

7 **Q. Have you ever testified before this Commission or any other regulatory**  
8 **commission?**

9 A. I have never testified before the Missouri Public Service Commission. However, my  
10 written direct testimony was submitted to the Pennsylvania Public Utility Commission in  
11 December 2001 in connection with Trigen-Philadelphia's general rate case, but I was not  
12 subjected to cross-examination because the case was settled prior to scheduled hearings.

13 **Q. Mr. Schopman, what is your role within the Trigen Energy Corporation**  
14 **organization?**

15 A. I am Vice President of Trigen Energy Corporation.

16 **Q. Will you please explain Trigen Energy Corporation's intent with regarding to**  
17 **records transfer to Trigen Kansas City once the sale has occurred?**

18 A. Prior to close, Trigen Energy Corporation will perform an exhaustive search of its  
19 paper and electronic records. We will transfer our entire inventory of those records to Trigen  
20 Kansas City. We will retain a copy of those records here in Houston as well so that we may  
21 remain in compliance with all statutory and other obligations such as those arising from the  
22 Purchase and Sale Agreement. Subsequent to close, should Trigen Energy Corporation

1 discover any additional documents related to Trigen Kansas City, we will promptly provide  
2 those documents to Trigen Kansas City.

3 **Q. Will Trigen energy also make available any member of its staff to support any**  
4 **future regulatory proceedings related to Trigen Kansas City?**

5 A. No, that will not be possible nor will it be practical. In 2002, Trigen Energy  
6 Corporation made a decision to relocate its corporate offices from White Plains, New York to  
7 Houston, Texas. In that move, none of personnel in White Plains with any familiarity with  
8 the business operations of Trigen Kansas City either accepted or were offered positions in  
9 Houston. Also, in 2002, Trigen Energy Corporation centralized its local accounting  
10 functions in Houston, including accounting for Trigen Kansas City. No employees with  
11 experience in the Trigen Kansas City business either accepted or were offered positions in  
12 Houston. The accounting staff in Houston that currently performs the accounting functions  
13 for Trigen Kansas City will be furloughed after the DHCS transaction closes and any agreed  
14 upon transition period has lapsed. As a result, there simply will be nobody within the Trigen  
15 Energy Corporation organization with any knowledge of the Trigen Kansas City business.

16 **Q. Will the same apply with operational staff?**

17 A. Yes. During the move from White Plains to Houston, no operations personnel who  
18 were familiar with the Trigen Kansas City facilities either accepted or were offered a position  
19 in Houston. In any case, the principal source of operational expertise was maintained at the  
20 Trigen Kansas City facility. It is my understanding that the Buyer intends to keep the current  
21 operational staff largely intact. Therefore, sufficient operational expertise will remain at  
22 Trigen Kansas City should the need arise for future testimony or other support.