Exhibit No.:

Issue(s): Request for Approval of Transfers, CCN and

Affiliate Rule Waivers

Witness/Type of Exhibit: Kind/Surrebuttal Sponsoring Party: Public Counsel Case No.: EA-2013-0098/EO-2012-0367

SURREBUTTAL TESTIMONY

OF

RYAN KIND

Submitted on Behalf of the Office of the Public Counsel

KANSAS CITY POWER & LIGHT COMPANY KCP&L GREATER MISSOURI OPERATIONS COMPANY TRANSOURCE MISSOURI LLC

Case No. EA-2013-0098

**

Denotes Highly Confidential Information that has been Redacted

March 6, 2013

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Transource Missouri, LLC for a Certificate of Convenience and Necessity Authorizing it to Construct, Finance, Own, Operate, and Maintain the Iatan-Nashua and Sibley- Nebraska City Electric Transmission Projects)	File No. EA-2013-0098			
In the Matter of the Application of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company Regarding Arrangements for Approval to Transfer Certain Transmission Property to Transource Missouri, L.L.C. and for Other Related Determinations	File No. EO-2012-0367			
AFFIDAVIT OF RYAN KIND				
STATE OF MISSOURI)				
COUNTY OF COLE) ss				
Ryan Kind, of lawful age and being first duly sworn, deposes and states:				
 My name is Ryan Kind. I am a Chief Counsel. 	Utility Economist for the Office of the Public			
2. Attached hereto and made a part hereof	for all purposes is my surrebuttal testimony.			
 I hereby swear and affirm that my stat true and correct to the best of my knowled 	rements contained in the attached affidavit are edge and belief.			

Subscribed and sworn to me this 6^{th} day of March 2013.



JERENE A. BUCKMAN My Commission Expires August 23, 2013 Cole County Commission #09754037

Jerene A. Buckman Notary Public

My commission expires August 23, 2013.

SURREBUTTAL TESTIMONY

OF

RYAN KIND

CASE NOS. EO-2012-0367 & EA-2013-0098

Q.	PLEASE STATE YOUR NAME,	TITLE, AND BUSINESS ADDRESS.

- A. Ryan Kind, Chief Energy Economist, Office of the Public Counsel, P.O. Box 2230,
 Jefferson City, Missouri 65102.
- Q. ARE YOU THE SAME RYAN KIND THAT HAS PREVIOUSLY FILED REBUTTAL TESTIMONY IN THIS CASE?
- A. Yes.

Q. What is the purpose of your surrebuttal testimony?

- A. The purpose of my surrebuttal testimony is to address the similarities between the ratepayer impact analysis in Commission Staff witness Charles Hyneman's rebuttal testimony and **

 ** In addition,

 I have provided information about the limited availability of relevant information in the DR responses provided by the Company in response to Staff DRs that may have led Mr. Hyneman to perform his own ratepayer impact study.
- Q. DID STAFF WITNESS CHARLES HYNEMAN CALCULATE AN ESTIMATE OF THE HARM TO KCPL/GMO RETAIL RATEPAYERS THAT WOULD RESULT FROM THE COMMISSION GRANTING THE RELIEF REQUESTED BY THE APPLICANTS IN THESE TWO CASES?

Surrebuttal Testimony of Ryan Kind

A. Yes. Mr. Hyneman's direct testimony contains a table at the bottom of page 16 that summarizes the results of his calculations. This table shows adverse retail rate impacts to KCPL/GMO customers that range from \$27 million to \$76 million as the duration of the analysis is increased from a five year time period to a twenty year time period. As noted by Mr. Hyneman at line 6 on page 16 of his testimony, this analysis only included FERC ROE incentives and "would likely result in a higher detriment if it included all of the other FERC extraordinary ratemaking that GMO has asserted that it would seek and be granted by the FERC."

Q. DID YOUR DIRECT TESTIMONY **

** At the top of page 17 of his testimony, Mr. Hyneman makes it clear that

Surrebuttal Testimony of Ryan Kind

although the Staff requested "any analysis of the impact on KCPL/GMO's ratepayers of the proposed transaction" in Staff DR 0081, the Company did not provide **

** as part of its response. Instead, the Company's initial response to DR No. 0081 stated that it had no such analysis that was not protected by attorney client privilege or work product. In a supplemental response to Staff DR 0081, the Company provided a very limited one-year analysis of just one of the two transmission projects that is relevant to Case Nos. EA-2013-0098 and EO-2012-0367. I am not aware of any additional supplemental DR responses to Staff DR 0081 that includes the **

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Q. IN YOUR REBUTTAL TESTIMONY, YOU STATED AT LINE 5 ON PAGE 9 THAT **

		Surrebuttal Testimony of Ryan Kind	
1			
2		**	
3	Q.	DOES PUBLIC COUNSEL SOMETIMES RELY ON THE INFORMATION PROVIDED BY	
4		UTILITY COMPANIES IN THEIR RESPONSE TO STAFF DRS AS OPC PREPARES TO	
5		WRITE TESTIMONY THAT SUPPORTS THE INTERESTS OF THE PUBLIC IN COMMISSION	
6		CASES?	
7	A.	Certainly. Public Counsel has access to only a small fraction of the resources possessed	
8		by Staff so we sometimes use information provided in response to Staff DRs to help us as	
9		we pursue our mission of effectively advocating for the interests of utility customers and	
10		the public in Commission cases.	
11	Q.	**	
12			
13			
14			
15			
16			
17			
18		**	
19	Q.	DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?	
20	A.	Yes.	