

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

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Denotes Highly Confidential Information that has been Redacted

March 6, 2013

Exhibit NO. 3
File NO. EA-2013-0098

NP

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

In the Matter of the Application of Transource)
 Missouri, LLC for a Certificate of) File No. EA-2013-0098
 Convenience and Necessity Authorizing it to)
 Construct, Finance, Own, Operate, and)
 Maintain the Iatan-Nashua and Sibley-)
 Nebraska City Electric Transmission Projects)

In the Matter of the Application of Kansas City)
 Power & Light Company and KCP&L Greater)
 Missouri Operations Company Regarding) File No. EO-2012-0367
 Arrangements for Approval to Transfer Certain)
 Transmission Property to Transource Missouri,)
 L.L.C. and for Other Related Determinations)

AFFIDAVIT OF RYAN KIND

STATE OF MISSOURI)
) ss
 COUNTY OF COLE)

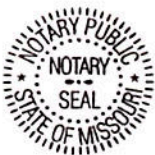
Ryan Kind, of lawful age and being first duly sworn, deposes and states:

1. My name is Ryan Kind. I am a Chief Utility Economist for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached affidavit are true and correct to the best of my knowledge and belief.




 Ryan Kind

Subscribed and sworn to me this 6th 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

KANSAS CITY POWER & LIGHT COMPANY, KCPL GREATER MISSOURI

OPERATIONS COMPANY AND TRANSOURCE MISSOURI, LLC

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

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

2 A. Ryan Kind, Chief Energy Economist, Office of the Public Counsel, P.O. Box 2230,
3 Jefferson City, Missouri 65102.

4 **Q. ARE YOU THE SAME RYAN KIND THAT HAS PREVIOUSLY FILED REBUTTAL TESTIMONY**
5 **IN THIS CASE?**

6 A. Yes.

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

8 A. The purpose of my surrebuttal testimony is to address the similarities between the
9 ratepayer impact analysis in Commission Staff witness Charles Hyneman's rebuttal
10 testimony and ** ** In addition,
11 I have provided information about the limited availability of relevant information in the
12 DR responses provided by the Company in response to Staff DRs that may have led Mr.
13 Hyneman to perform his own ratepayer impact study.

14 **Q. DID STAFF WITNESS CHARLES HYNEMAN CALCULATE AN ESTIMATE OF THE HARM TO**
15 **KCPL/GMO RETAIL RATEPAYERS THAT WOULD RESULT FROM THE COMMISSION**
16 **GRANTING THE RELIEF REQUESTED BY THE APPLICANTS IN THESE TWO CASES?**

NP

Surrebuttal Testimony of
Ryan Kind

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

9 Q. DID YOUR DIRECT TESTIMONY **

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

Surrebuttal Testimony of
Ryan Kind

1 although the Staff requested “any analysis of the impact on KCPL/GMO’s ratepayers of
2 the proposed transaction” in Staff DR 0081, the Company did not provide **

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

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

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Q. DOES PUBLIC COUNSEL SOMETIMES RELY ON THE INFORMATION PROVIDED BY UTILITY COMPANIES IN THEIR RESPONSE TO STAFF DRs AS OPC PREPARES TO WRITE TESTIMONY THAT SUPPORTS THE INTERESTS OF THE PUBLIC IN COMMISSION CASES?

A. Certainly. Public Counsel has access to only a small fraction of the resources possessed by Staff so we sometimes use information provided in response to Staff DRs to help us as we pursue our mission of effectively advocating for the interests of utility customers and the public in Commission cases.

Q. **

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Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A. Yes.