Exhibit No: Issues:

Case No.:

Witness: James

Sponsoring Party: Type of Exhibit:

Date Testimony Prepared:

James A. Busch MO PSC Staff Supplemental Surrebuttal Testimony ER-2006-0314 October 12, 2006

Rate Design

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

SUPPLEMENTAL SURREBUTTAL TESTIMONY

OF

JAMES A. BUSCH

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2006-0314

Jefferson City, Missouri October 2006

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas) City Power & Light Company for) Approval to Make Certain Changes in its) Charges for Electric Service to Begin the) Implementation of Its Regulatory Plan)

Case No. ER-2006-0314

AFFIDAVIT OF JAMES A. BUSCH

STATE OF MISSOURI)) ss COUNTY OF COLE)

James A. Busch, of lawful age, on his oath states: that he has participated in the preparation of the following Supplemental Surrebuttal Testimony in question and answer form, consisting of 2 pages of Supplemental Surrebuttal Testimony to be presented in the above case, that the answers in the following Supplemental Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

James A. Busch

Subscribed and sworn to before me this $\frac{1}{2}$ day of October, 2006.

Notary Pu

DAWN L. HAKE My Commission Expires March 16, 2009 Cole County Commission #05407843

My commission expires

1	SUPPLEMENTAL SURREBUTTAL TESTIMONY							
23	OF							
4 5	JAMES A. BUSCH							
6 7	KANSAS CITY POWER & LIGHT COMPANY							
8 9	CASE NO. ER-2006-0314							
10 11								
12 13	Q. Please state your name and business address.							
14	A. My name is James A. Busch and my business address is P. O. Box 360,							
15	Jefferson City, Missouri 65102.							
16	Q. By whom are you employed and in what capacity?							
17	A. I am a Regulatory Economist III in the Economic Analysis Section of the							
18	Energy Department, Utility Operations Division of the Missouri Public Service Commission							
19	(Staff).							
20	Q. Are you the same James A. Busch who filed direct, rebuttal, and surrebuttal							
21	testimony on behalf of Staff in this proceeding?							
22	A. Yes I am.							
23	Q. What is the purpose of your supplemental surrebuttal testimony?							
24	A. In my direct testimony, I presented Staff's recommendation for the							
25	methodology the Commission should employ to determine appropriate revenue neutral shifts							
26	in class revenue responsibility and included Schedule JAB-2 to show the results of Staff's							
27	rate design methodology based upon Staff's Class Cost of Service Study (CCOS), which was							
28	presented in the direct testimony of Staff witness Janice Pyatte. In Ms. Pyatte's surrebuttal							
29	testimony, she presented a revised CCOS. This supplemental surrebuttal testimony presents							

Surrebuttal Testimony of James A. Busch

an updated Schedule JAB-2 (Schedule JAB-2 (Revised)) that is based on the results of Ms.
 Pyatte's revised CCOS and Staff's recommendation presented in my direct testimony for the
 methodology the Commission should employ to determine appropriate revenue neutral shifts
 in class revenue responsibility, *i.e.*, the differences between Schedule JAB-2 and Schedule
 JAB-2 (Revised) are solely due to changes in Staff's CCOS results.

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Q. Are you revising anything in your supplemental testimony filed on October 6, 2006?

8 A. No. This supplemental surrebuttal testimony does not change any of my
9 surrebuttal testimony. It only updates Staff's proposed revenue neutral shifts in class revenue
10 responsibility.

Does this conclude your supplemental surrebuttal testimony?

A. Yes.

Q.

STAFF'S CCOS RESULTS AND RATE DESIGN PROPOSAL Kansas City Power Light ER-2006-0314

Rate Revenue	MO Retail \$483,655,953	Residential \$173,661,690	Small GS \$37,014,983	Medium GS \$63,152,089	Large GS \$110,105,736	Large Power \$99,721,455	Lighting \$0
Staff CCOS Deficiency (\$) Staff CCOS Deficiency (%)		\$14,305,014 8.24%	(\$1,305,797) -3.53%	(\$5,523,203) -8.75%	(\$2,651,279) -2.41%	(\$4,821,735) -4.84%	\$0 0.00%
Proposed % Reduction Revenue Reductions Revenue Increases	\$7,464,473	\$7,464,473	-2.41% (\$891,298)	-2.41% (\$1,520,664)	-2.41% (\$2,651,279)	-2.41% (\$2,401,232)	\$0
Revenue-Neutral \$ Change	\$0	\$7,464,473	(\$891,298)	(\$1,520,664)	(\$2,651,279)	(\$2,401,232)	\$0
Revenue-Neutral % Change	0.00%	4.30%	-2.41%	-2.41%	-2.41%	-2.41%	0.00%
Post-Shift Rate Revenues		\$181,126,163	\$36,123,685	\$61,631,425	\$107,454,457	\$97,320,223	\$0