Exhibit No.: Issues: Witness: Sponsoring Party: Type of Exhibit: Case No.: Date Testimony Prepared:

Rate of Return, Cost of Capital Matthew J. Barnes MoPSC Staff True-Up Direct Testimony ER-2006-0314 Novemberr 7, 2006

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY SERVICES DIVISION

TRUE-UP DIRECT TESTIMONY

OF

MATTHEW J. BARNES

KANSAS CITY POWER AND LIGHT COMPANY

CASE NO. ER-2006-0314

Jefferson City, Missouri November 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 MATTHEW J. BARNES

STATE OF MISSOURI)) ss.

COUNTY OF COLE

Matthew Barnes, of lawful age, on his oath states: that he has participated in the preparation of the foregoing True-Up Direct Testimony in question and answer form, consisting of 3 pages to be presented in the above case; that the answers in the foregoing True-Up Direct Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of his knowledge and belief.

Subscribed and sworn to before me this 6^{+n} day of NOVember 2006.



ASHLEY M. HARRISON My Commission Expires August 31, 2010 Cole County Commission #06898978

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1		TRUE-UP DIRECT TESTIMONY
2		OF
3		MATTHEW J. BARNES
4		KANSAS CITY POWER AND LIGHT COMPANY
5		CASE NO. ER-2006-0314
6	Q.	Please state your name.
7	А.	My name is Matthew J. Barnes.
8	Q.	Are you the same Matthew J. Barnes who filed direct, rebuttal, and surrebuttal
9	testimony in	this proceeding for the Staff of the Missouri Public Service Commission (Staff)?
10	А.	Yes, I am.
11	Q.	In your direct testimony, did you provide your expert opinion on what you
12	considered t	o be a fair and reasonable rate-of-return on the Missouri jurisdictional electric
13	utility rate ba	ase for Kansas City Power & Light (KCP&L or Company)?
14	А.	Yes, I did.
15	Q.	What is the purpose of your true-up direct testimony?
16	А.	The purpose of my true-up direct testimony is to provide the Commission the
17	updated capi	tal structure, embedded cost of long-term debt and overall rate of return as of
18	September 3	0, 2006 for KCP&L.
19	<u>KCP&L'S (</u>	CAPITAL STRUCTURE AS OF SEPTEMBER 30, 2006
20	Q.	Please explain Staff's updated capital structure.

True-up Direct Testimony of Matthew J. Barnes

1	A.	As of September 30, 2006, KCP&L's capital structure consisted of
2	53.69 percent	equity, 1.53 percent preferred stock, and 44.79 percent long-term debt. Please
3	see Schedule	1.
4	Q.	Did the embedded cost of long-term debt change as of September 30, 2006?
5	А.	Yes. KCP&L's embedded cost of long-term debt as of September 30, 2006,
6	was calculated	d by the company to be 6.21 percent. Please see Schedule 2.
7	Q.	Why did KCP&L's embedded cost of long-term debt increase since June 30,
8	2006?	
9	А.	KCP&L's embedded cost of long-term debt increased because of the increase
10	in interest rate	es associated with their interest rate management products. The increase of the
11	embedded co	st of long-term debt caused Staff's rate of return to increase 10 basis points.
12	Staff now re	ecommends a rate of return for KCP&L in the range of 7.85 percent to
13	7.90 percent.	
14	Q.	Did the embedded cost of preferred stock change as of September 30, 2006?
15	А.	No. The embedded cost of preferred stock as of September 30, 2006, remained
16	the same at 4.	29 percent.
17	Q.	Did Staff change is method of determining the true-up capital structure and
18	long-term deb	ot amounts?
19	A.	No. Staff did not change its method of determining the true-up capital
20	structure and	long-term debt amounts.
21	Q.	Does Staff still recommend a return on equity (ROE) in the range of
22	9.32 percent t	o 9.42 percent with a mid-point of 9.37 percent?
23	А.	Yes. Please see Schedule 3.

2

True-up Direct Testimony of Matthew J. Barnes

1 SUMMARY AND CONCLUSIONS

2

Q. Please summarize the conclusions of your true-up direct testimony.

A. My recommended cost of common equity, which is in the range of
9.32 percent to 9.42 percent, would produce a fair and reasonable rate of return of
7.85 percent to 7.90 percent for KCP&L's Missouri jurisdictional electric utility rate base.

Does this conclude your true-up direct testimony?

6 7 Q.

A. Yes, it does.

3

Kansas City Power and Light Company Case No. ER-2006-0314

Capital Structure as of September 30, 2006 Great Plains Energy

Capital Component	An	Dollar nount (000's)	Percentage of Capital
Common Stock Equity	\$	1.372.092	53.69%
Preferred Stock	φ \$	39,000	1.53%
Long-Term Debt		\$1,144,565	44.79%
Short-Term Debt	\$	-	0.00%
Total Capitalization	\$	2,555,657	100.00%

Electric Financial Ratio Benchmark Total Debt / Total Capital

Standard & Poor's Corporation's RatingsDirect, Revised Financial Guidelines as of June 2, 2004 BBB Credit Rating based on a "6" Business Profile

48% to 58%

Notes: 1. Long-term Debt at September 30, 2006 includes current maturities of long-term debt. This balance also includes the amount of non-regulated debt. These balances were provided in KCP&L's response to DR 0552.

2. Short-term debt balance net of construction work in progress (CWIP) was negative as of September 30, 2006. Therefore, no short-term debt is included in the capital structure.

Source: Kansas City Power and Light's response to Staff's Data Request No. 0552

Kansas City Power and Light ER-2006-0314

KANSAS CITY POWER & LIGHT COMPANY AND GREAT PLAINS ENERGY

				Weighted Av	erage Cost of Lon		oital				
		(a)	(b)	(c)	At September 30 (d)	(e)	(f)	(g)	(h)	(i)	(j)
						Underwriters			0.11	Long-term	Annual Cost
1.1	lesus.	Initial	Date of	Date of	Price to	Discounts &	Issuance	Net Proceeds	Cost to	Debt Capital	of Long-term
Line KAN	Issue SAS CITY POWER & LIGHT ONLY	Offering	Offering	Maturity	Public	Commissions	Expense	to Company	Company	Outstanding	Debt Capital
	General Mortgage Bonds										
1	Medium Term Notes - Series C (1)	\$150,000,000	Various	Various	\$150,000,000	\$968,050	\$572,926 (2)	\$148,459,024	8.085%	\$500,000	\$40,427
	Pledged General Mortgage Bonds										
2	EIRR 1992 Series	\$31,000,000	9/15/1992	7/1/2017					3.684%	\$31,000,000	\$1,142,040
3	EIRR Hawthorn 1993 Series - 4.0% Coupon	\$12,366,000	10/14/1993	1/2/2012					4.202%	\$12,366,000	\$519,619
4	MATES Series 1993-A	\$40,000,000	12/7/1993	12/1/2023					3.616%	\$40,000,000	\$1,446,400
5	MATES Series 1993-B	\$39,480,000	12/7/1993	12/1/2023					3.585%	\$39,480,000	\$1,415,358
6	EIRR La Cygne 1994 Series - 4.05% Coupon	\$13,982,500	2/23/1994	3/1/2015					4.245%	\$13,982,000	\$593,536
	EIRR La Cygne 1994 Series - 4.65% Coupon	\$21,940,000	2/23/1994	9/1/2035					4.813%	\$21,940,000	\$1,055,972
	Unsecured Notes										
7	Senior Notes Due 2007 - 6% (3)	\$225,000,000	3/13/2002	3/15/2007	\$224,538,750	\$1,350,000	\$327,659	\$222,861,091	6.325%	\$225,000,000	\$14,232,304
8	Senior Notes Due 2011 - 6.5% Coupon (4)	\$150,000,000	3/20/2001	11/15/2011	\$150,000,000	\$1,198,500	\$50,000	\$148,751,500	6.697%	\$150,000,000	\$10,045,902
9	Senior Notes Due 2035 -6.05% Coupon (5)	\$250,000,000	11/17/2005	11/15/2035	\$250,000,000	\$2,187,500	\$150,000	\$247,662,500	6.146%	\$250,000,000	\$15,365,776
10											
11	Environmental Improvement Revenue Refun	ding Bonds									
12	Series 1998-A Due 2015-4.75% Coupon	\$56,500,000	8/11/1998	9/1/2015					4.776%	\$56,500,000	\$2,698,440
13	Series 1998-B Due 2015-4.75% Coupon	\$50,000,000	8/11/1998	9/1/2015					4.774%	\$50,000,000	\$2,387,000
14	Series 1998-C Due 2035-4.65% Coupon	\$50,000,000	8/11/1998	9/1/2035					4.837%	\$50,000,000	\$2,418,500
15	Series 1998-D Due 2017-4.75% Coupon	\$40,000,000	8/11/1998	10/1/2017					4.774%	\$40,000,000	\$1,909,744
16											
17	Other Long-Term Debt										
18	Unamortized Discount on Senior Notes									(1,461,104.12)	\$0
19	Loss/(Gain) on Reaquired Debt									\$0	\$ 815,805
20	Weighted Cost of Interest Rate Management Pr	oducts								\$0	\$991,236
21									-		
22	Total KCP&L Long-Term Debt Capital			A	t September 30, 20	006			_	\$979,306,896	\$57,078,059
23									-		
24	KCP&L Weighted Avg. Cost of Long-Term	Debt Capital			At September 30,	, 2006		5.828%			

Kansas City Power and Light ER-2006-0314

KANSAS CITY POWER & LIGHT COMPANY AND GREAT PLAINS ENERGY

				Weighted Av	verage Cost of Lon	g-Term Debt Cap	oital				
					At September 30	, 2006					
		(a)	(b)	(c)	(d)	(e) Underwriters	(f)	(g)	(h)	(i) Long-term	(j) Annual Cost
		Initial	Date of	Date of	Price to	Discounts &	Issuance	Net Proceeds	Cost to	Debt Capital	of Long-term
Line	e Issue	Offering	Offering	Maturity	Public	Commissions	Expense	to Company	Company	Outstanding	Debt Capital
GRI	EAT PLAINS ENERGY ONLY										
	Unsecured Notes	_									
1	FELINE PRIDES	\$163,600,000	6/14/2004	2/16/2009	\$163,600,000	\$1,063,400	\$129,976	\$162,406,624	8.471%	\$163,600,000	\$13,858,279
	Affordable Housing Notes	_									
2	Missouri Affordable Housing Fund IX - NDH	\$3,907,767	3/30/1999	10/1/2008					7.600%	\$1,351,524	\$102,716
3	Boston Financial Tax Credit Fund I - NDH	\$1,481,000	3/30/1999	10/1/2006					7.600%	\$306,681	\$23,308
1										\$1,658,205	\$126,024
4 5	Total GPE Only Long-Term Debt Capit	tal		A	t September 30, 20	006				\$165,258,205	\$13,984,303
6											
7	GPE Only Weighted Avg. Cost of Long-Te	erm Debt Capital			At September 30	, 2006		8.462%			
GRI	EAT PLAINS ENERGY										
	Total GPE Long-Term Debt Capital			A	t September 30, 20	006				\$1,144,565,101	\$71,062,362
	GPE Weighted Avg. Cost of Long-Term D	ebt Capital			At September 30	, 2006		6.209%			

(1) Expenses associated with the Series C Medium Term Note issue are being amortized monthly over a 12 year period.

(2) Costs associated with the early issuance of Series C and Series D Medium Term Notes for refunding Series B Medium Term Notes and First Mortgage Bonds in April and May 1993 have been added to Issuance Expenses.

(3) Expenses associated with the Senior Notes, Series A issue are being amortized monthly over a 5 year period.

(4) Expenses associated with the Senior Notes issue are being amortized quarterly over a 10 year period.

(5) Projected - Expenses associated with the Senior Notes issue are being amortized quarterly over a 30 year period.

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Weighted Cost of Capital as of September 30, 2006 for Kansas City Power and Light Company

			Weighted Cost of C Common Equity		
Capital Component	Percentage of Capital	Embedded Cost	9.32%	9.37%	9.42%
Common Stock Equity	53.69%		5.00%	5.03%	5.06%
Preferred Stock	1.53%	4.29%	0.07%	0.07%	0.07%
Long-Term Debt	44.79%	6.21%	2.78%	2.78%	2.78%
Short-Term Debt	0.00%				
Total	100.00%		7.85%	7.88%	7.90%

Notes:

Embedded Cost of Long-Term Debt and Embedded Cost of Preferred Stock Taken from Response to DR 0552.