# Leon C. Bender List of Previously Filed Testimony

Case	<u>Company</u>
ER-2004-0034	Aquila, Inc.
EC-2002-0001	AmerenUE, Inc.
ER-2001-0299	Empire District Electric Company
EM-1997-0515	Kansas City Power & Light Company
ER-1997-0394	Utilicorp United, Inc.
EC-1997-0362	Utilicorp United, Inc.

## Summary of Results of Staffs Production Cost Model

Generation (energy

(MWH))

3,857,285

1,235,581

5,092,866

\$66,267,594

\$20,051,552

\$86,319,146

\$16.95

#### **Totals Base Gas Price**

Generation (energy
(MWH))
Purchases (energy (MWH))
Total weather Normal Load
Fuel expenses (cost (\$))
Purchases (cost (\$))
Total expense (cost (\$))
Average Cost (\$/MWH)

## Base Gas Price Simulation

#### Total Cost Units Generation Expense (**\$/MWH**) ASBURY 1 1,284,788 \$15,408,492.46 \$11.99 ASBURY 2 9,489 \$192,255.94 \$20.26 ENERGY CTR 1 38,392 \$2,113,797.35 \$55.06 ENERGY CTR 2 17,288 \$970,473.35 \$56.14 **ENERGY CTR 3** 92,758 \$3,325,280.00 \$35.85 59,119 \$35.79 **ENERGY CTR 4** \$2,115,656.00 IATAN 1 574,265 \$3,895,400.80 \$6.78 **RIVERTON 7** 174,876 \$2,783,101.18 \$15.91 **RIVERTON 8** 281.355 \$4,265,996.11 \$15.16 **RIVERTON 9** 90 \$5,455.64 \$60.45 **RIVERTON 10** 184 \$11,423.69 \$62.09 **RIVERTON 11** \$10,445.51 \$64.38 162 STATE LINE 1 39,711 \$1,821,620.00 \$45.87 STATE LINE CC 1,225,027 \$29,348,196.00 \$23.96 OZARK BEACH (Hydro) 59.781 \$0.00 \$0.00 **Total Generation** 3,857,285 \$66,267,594.03 \$17.18 **Purchases** Spot Market Purchases 214,111 \$6,382,696.00 \$29.81 Jeffrey Purchase (162MW) \$13,668,856.00 1,021,470 \$13.38 \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_\_ Total 5,092,866 \$86,319,146.03 \$16.95

#### **Totals Ceiling Gas Price**

Purchases (energy (MWH))

Total weather Normal Load

Fuel expenses (cost (\$))

Total expense (cost (\$))

Average Cost (\$/MWH)

Purchases (cost (\$))

3,505,063

1,587,923

5,092,986

\$21.55

\$75,629,711

\$34,140,959

\$109,770,670

# Ceiling Gas Price Simulation

	TotalCost		
Units	Generation	Expense	(\$/MWH)
ASBURY 1	1,304,579	\$15,632,213.11	\$11.98
ASBURY 2	13,504	\$272,782.15	\$20.20
ENERGY CTR 1	8,653	\$883,225.72	\$102.07
ENERGY CTR 2	2,537	\$259,484.00	\$102.30
ENERGY CTR 3	33,121	\$2,133,728.00	\$64.42
ENERGY CTR 4	17,303	\$1,112,064.00	\$64.27
IATAN 1	578,467	\$3,910,090.20	\$6.76
RIVERTON 7	175,592	\$2,788,695.30	\$15.88
RIVERTON 8	288,143	\$4,372,472.32	\$15.17
RIVERTON 9	36	\$4,161.74	\$116.68
RIVERTON 10	142	\$16,449.39	\$116.11
RIVERTON 11	156	\$18,275.93	\$117.53
STATE LINE 1	15,517	\$1,247,479.00	\$80.39
STATE LINE CC	1,007,602	\$42,978,590.00	\$42.65
OZARK BEACH (Hydro)	59,713	\$0.00	\$0.00
Total Generation	3,505,063	\$75,629,710.86	\$21.58
Purchases		\$ -	
Spot Market Purchases	529,338	پ \$19,971,550.00	\$37.73
Jeffrey Purchase (162MW)	1,058,585	\$14,169,409.00	\$13.39
	1,038,383	\$14,109,409.00 ========	φ13.39 
Total	5,092,986	\$109,770,669.86	\$21.55

Generating Units	Modeled Planned Outage Hours	Actual 5 Year Ave. A	ctual 6 Year Ave. Actual 10 Year Av
ASBURY 1	864	868	
ASBURY 2	888	899	
ENERGY CTR 1	1200	1180	
ENERGY CTR 2	869		869
ENERGY CTR 3	384	*	
ENERGY CTR 4	384	*	
IATAN 1	768		766
<b>RIVERTON 7</b>	504	495	
<b>RIVERTON 8</b>	648	634	
<b>RIVERTON 9</b>	408	405	
<b>RIVERTON 10</b>	864	859	
<b>RIVERTON 11</b>	528	532	
STATE LINE 1	480	459	
STATE LINE CC	816	819**	

\*Energy Center 3 & 4 have been in operation only one year \*\*State Line Combined Cycle has been in operation only three years

	Model Forced	
Generating Units	<b>Outage Hours</b>	Actual 5 Year Ave.
ASBURY 1	336	369
ASBURY 2	290	311
ENERGY CTR 1	80	87
ENERGY CTR 2	158	123
ENERGY CTR 3	87	62*
ENERGY CTR 4	80	53*
IATAN 1	589	623
<b>RIVERTON 7</b>	48	78
<b>RIVERTON 8</b>	372	358
<b>RIVERTON 9</b>	28	20
<b>RIVERTON 10</b>	142	128
<b>RIVERTON 11</b>	31	22
STATE LINE 1	640	524
STATE LINE CC	23	18**

Fuel Prices	Supplied by Staff witness John Cassidy
Unit Maintenance History	4CSR 240-3.190 data DR's 22,23, 24, 25 & 38.
Generation Unit Specific Data	DR's 18 thru 38
Weather Normalized Hourly Load	Supplied by Staff Witness Rick Campbell
Purchase Power Contracts;	4CSR 240-3.190 data
Capacities and Prices	DR 26, 27, 38 & 262
	Western Resources- Jeffrey Units 162 MW