

Exhibit No.:  
Issue: Off-system sales margin adjustments  
Witness: Burton L. Crawford  
Type of Exhibit: Surrebuttal Testimony  
Sponsoring Party: Kansas City Power & Light Company  
Case No.: ER-2010-0355  
Date Testimony Prepared: January 5, 2011

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO.: ER-2010-0355**

**SURREBUTTAL TESTIMONY**

**OF**

**BURTON L. CRAWFORD**

**ON BEHALF OF**

**KANSAS CITY POWER & LIGHT COMPANY**

**Kansas City, Missouri  
January 2011**

**SURREBUTTAL TESTIMONY**

**OF**

**BURTON L. CRAWFORD**

**Case No. ER-2010-0355**

1 **Q: Please state your name and business address.**

2 A: My name is Burton L. Crawford. My business address is 1200 Main, Kansas City,  
3 Missouri 64105.

4 **Q: Are you the same Burton L. Crawford who prefiled direct and rebuttal testimony in**  
5 **this matter?**

6 A: Yes.

7 **Q: What is the purpose of your surrebuttal testimony?**

8 A: The purpose of my testimony is to rebut issues raised by Staff witness V. William Harris  
9 concerning SPP line loss charges and revenues.

10 **Q: Please describe the position taken by Staff concerning SPP line loss charges and**  
11 **revenues.**

12 A: Staff has opposed the adjustment proposed by KCP&L to include SPP line loss charges in  
13 the calculation of KCP&L's off-system sales margin. While Staff opposes including the  
14 SPP line loss charges, they do include SPP line loss revenues in the calculation of the off-  
15 system sales margin. In rebuttal testimony, Mr. Harris has proposed an alternative SPP  
16 line loss revenue treatment. The alternative is to include SPP "line loss revenues in  
17 KCPL's revenue requirement (separate and apart from Mr. Schnitzer's projected level of  
18 OSS margin)" (Harris rebuttal, page 4, lines 10-12).

19 **Q: Do you agree with Staff's proposed treatment of SPP line loss charges?**

1 A: No. Staff continues to reject this expense. As more fully explained in my rebuttal  
2 testimony in this case, these are expenses directly incurred by KCP&L as part of making  
3 off-system sales and as such should be recoverable as an off-system sales expense. In  
4 addition, Staff's position creates a mismatch between expenses and revenues. The SPP  
5 line loss revenue that Staff agrees should be included is funded by the very charges that  
6 Staff excludes, that is the SPP line loss charges.

7 **Q: Does the Company have an alternative proposal for the Commission to consider**  
8 **concerning SPP line loss charges?**

9 A: Yes. Assuming that the Commission determines that the SPP line loss charges should not  
10 be included in the calculation of KCP&L's off-system sales margins as the Company has  
11 proposed, at a minimum the Commission should recognize these expenses incurred by  
12 the Company and allow them to be recovered in KCP&L's revenue requirement. While  
13 this is not the Company's preferred approach, it would at least be consistent with Staff's  
14 alternative treatment for SPP line loss revenues and allow for the Company to recover  
15 these legitimately incurred expenses.

16 **Q: Does that conclude your testimony?**

17 A: Yes, it does.

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

In the Matter of the Application of Kansas City )  
Power & Light Company to Modify Its Tariffs to ) Docket No. ER-2010-0355  
Continue the Implementation of Its Regulatory Plan )

**AFFIDAVIT OF BURTON L. CRAWFORD**

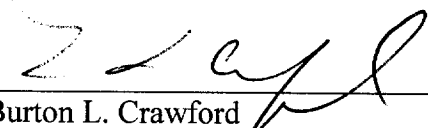
**STATE OF MISSOURI** )  
 ) ss  
**COUNTY OF JACKSON** )

Burton L. Crawford, being first duly sworn on his oath, states:

1. My name is Burton L. Crawford. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Senior Manager, Energy Resource Management.

2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Kansas City Power & Light Company consisting of two (2) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Burton L. Crawford

Subscribed and sworn before me this 5<sup>th</sup> day of January, 2011.

  
\_\_\_\_\_  
Notary Public

My commission expires: Feb 4, 2011

