Exhibit No.: 024
Issue: Transmission System Operations
Witness: Richard A. Spring
Type of Exhibit: Direct Testimony
Sponsoring Party: Great Plains Energy Incorporated and Kansas City Power & Light Company
Case No.: EM-2007-____
Date Testimony Prepared: April 2, 2007

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EM-2007-____

DIRECT TESTIMONY

OF

RICHARD A. SPRING

ON BEHALF OF

GREAT PLAINS ENERGY INCORPORATED

AND

KANSAS CITY POWER & LIGHT COMPANY

Kansas City, Missouri
April 2007

DIRECT TESTIMONY

OF

RICHARD A. SPRING

Case No. EM-2007-____

Q: Please state your name and business address.

A: My name is Richard A. Spring. My business address is 1201 Walnut, Kansas City, Missouri 64106.

Q: By whom and in what capacity are you employed?

A: I am employed by Kansas City Power & Light Company ("KCPL") as Vice President, Transmission Services.

Q: What are your responsibilities?

A: My responsibilities include overseeing KCPL's transmission planning, transmission system operations, transmission energy accounting, Energy Management System ("EMS"), distribution outage management system ("OMS"), substation & transmission engineering, transmission construction & maintenance, substation construction & maintenance, and system protection.

Q: Please describe your education, experience and employment history.

A: I hold a Master of Business Administration from Rockhurst College, a Bachelor of Science in Mechanical Engineering from Wichita State University and an Associates of Arts degree from Butler County Community College. I began my career at KCPL in 1978 as a Staff Maintenance Engineer, promoted to Operations Supervisor in 1979 and Maintenance Superintendent 1982, all at the La Cygne Generating Station. I then moved

to the Iatan Generating Station as Maintenance Superintendent where I was promoted to Plant Manager in 1984. I returned to the La Cygne Generating Station in 1991 as Plant Manager. In 1993, I joined Northern Indiana Public Service Company as Director of Electric Production. I returned to KCPL in 1994 as Vice President, Production. I shifted responsibilities and was named Vice President Transmission and Environmental Services in 1999. In 2003, I was named to my current position of Vice President Transmission Services.

Q: Please describe your involvement with the Southwest Power Pool.

A: I am currently the Chair of the Southwest Power Pool ("SPP") Strategic Planning Committee, a member of the SPP Members Committee, and a member of the SPP Human Resources Committee. Previously, I served as a Director on the SPP Board of Directors prior to the evolution to the current independent Board of Directors.

Q: Have you previously testified in a proceeding at the Missouri Public Service Commission or before any other utility regulatory agency?

A: I have previously testified before both the Missouri Public Service Commission ("MPSC") and the Kansas Corporation Commission ("KCC").

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to provide an overview of both Aquila, Inc.'s ("Aquila") and KCPL's current electric transmission system configuration, operations, and Regional Transmission Organization ("RTO") membership and to describe the plans for the combined transmission systems of KCPL and Aquila after the proposed merger is completed.

Q: Please describe the various Schedules associated with your testimony.

A: Schedules RAS-1 through RAS-6 are transmission maps and system one-line diagrams illustrating the KCPL and Aquila transmission systems.

Q: Please provide an overview of the Aquila transmission system serving Missouri load.

A: Aquila owns and operates transmission facilities in the northwestern, north central and western areas of Missouri serving approximately 300,000 electric customers in Missouri. Within its transmission system, Aquila has direct interconnections with AmerenUE, Associated Electric Power Cooperative ("AEC"), the City of Independence ("IND"), Mid-American Energy Company ("MEC"), KCPL and Westar Energy Inc. ("WR"). Aquila operates two non-synchronous, normally open interconnections with Empire District Electric Company ("EDE") and KAMO Electric Cooperative ("KAMO"). Aquila has joint transmission ownership and interconnection agreements for the following facilities:

a) St. Joseph to Fairport, Missouri to Cooper Station at Brownville, Nebraska 345kV transmission line; known as the Cooper-Fairport-St. Joseph 345kV Interconnection ("CFSI"); and administered with a joint agreement between AEC, KCPL, Lincoln Electric System ("LES"), MEC, Nebraska Public Power District ("NPPD"), and Omaha Public Power District ("OPPD").
Aquila and OPPD jointly own the Cooper to St. Joseph 345kV transmission line with ownership changing at the point where the line crosses the Missouri river.

b) Aquila owns an 8 percent share of the Jeffrey Energy Center located in the WR territory. Transmission service is reserved, using a Jeffrey Transmission

Agreement with WR, to deliver Aquila this capacity and energy via the Jeffrey (WR) to Stranger Creek line; and known as the Aquila-WR Interconnection.

c) Swissvale to Stilwell to Peculiar to Pleasant Hill to Sibley 345kV transmission line; known as the "MOKAN Interconnection"; and joint owners are KCPL, Aquila and WR.

d) Hawthorn to Sibley to Overton 345kV transmission line; known as the "Missouri Interconnection"; and joint owners are KCPL, Aquila and AmerenUE.

e) Aquila owns an 18 percent share of the Iatan Generating Station located near Weston, MO and has a 345kV transmission line directly connected at the station facilities for transfer of this capacity and energy.

Aquila currently operates its transmission system from its Operations Center in Lee's Summit, Missouri using an EMS with Supervisory Control and Data Acquisition ("SCADA"). The Operations Center is manned 24 hours per day providing both normal and emergency operations for transmission and substation facilities.

Schedule RAS-1 illustrates the Aquila 69kV transmission system.

Schedule RAS-2 illustrates the Aquila 345kV and 161kV transmission system.

Schedule RAS-3 illustrates the Aquila (St. Joseph area) transmission system

Schedule RAS-4 illustrates the entire Aquila transmission configuration with land-based geography.

Q: Please provide an overview of the Kansas City Power & Light transmission system.

A: KCPL owns and operates transmission facilities in the west central and central areas of Missouri and east central areas of Kansas serving approximately 500,000 electric customers in Missouri and Kansas. Within its transmission system, KCPL has direct interconnections with AmerenUE, Aquila, AEC, Board of Public Utilities of Kansas City, Kansas ("BPU"), IND, and WR.

KCPL has joint ownership in the following transmission facilities:

a) The CFSI line, which is administered with a joint agreement with AEC, KCPL, LES, MEC, NPPD, and OPPD.

b) The MOKAN Interconnection line, which is jointly owned by KCPL, Aquila and WR.

c) The Missouri Interconnection line, which is jointly owned by KCPL, Aquila and AmerenUE.

KCPL operates its transmission system from its Transmission Control Center in Kansas City, Missouri using an EMS with SCADA. The Transmission Control Center is manned 24 hours per day providing both normal and emergency operations for transmission and substation facilities.

Schedule RAS-5 illustrates the entire KCPL transmission system with land-based geography.

Schedule RAS-6 illustrates the KCPL Kansas City metropolitan area transmission system with land-based geography.

Q: Please describe the proposed plan for integrating Aquila's transmission operations after the merger is completed.

A: The following are proposed action plans for combining the Aquila transmission operations and facilities into KCPL once the merger is completed:

1. Integrate Aquila's Operations Center into KCPL's Transmission Control Center. Combining the Aquila transmission operation into the KCPL Transmission Control Center should provide a more cost effective, integrated real-time and planned transmission operation of the combined transmission system. By operating from a single point of transmission system authority, KCPL can maintain consistent communication, coordinated field operations and integrated training and manpower schedules.
2. Incorporate Aquila's transmission planning functions into KCPL's transmission planning functions. Merging these areas should provide coordinated transmission planning over the combined service territories for: improved synergies in system modeling capabilities; reductions in transmission facility additions; improved tie-line coordination with the region; and a larger, more regional system planning scope.
3. Incorporate Aquila's transmission and substation field functions into KCPL's transmission and substation field functions. This should provide synergies in field operating practices where specific operation and maintenance practices can be engaged. KCPL is a recognized leader in

these practices and is in a position to apply specific industry best practices that will provide improvements in these critical operating areas.

4. Integrate Aquila's transmission and substation engineering functions into KCPL's transmission and substation engineering functions. Combining these groups will leverage the collaborative engineering talent and execute standardized design and construction methods, which should result in increased savings in transmission and substation asset investments.

5. KCPL plans to incorporate all Aquila transmission assets into its comprehensive transmission asset management plan. The asset management plan sets forth strategic investments in new transmission and substation facilities while also providing crucial maintenance, inspection, testing and replacement plans for aging infrastructure. KCPL provides Tier 1 service reliability levels to its customers and will move forward with plans to maintain the same level of service for the Aquila customers.

Q: Does KCPL have membership with a Regional Transmission Organization?

A: Yes. KCPL is a member of SPP and has turned over functional control of its transmission facilities to SPP as an RTO.

Q: Please describe KCPL's participation in the SPP RTO.

A: RTOs were promoted and established, among other reasons, in order to provide benefits and improvements in electric transmission services and in the operation of the bulk power system. These benefits include open and non-discriminatory electric transmission access and pricing, regional Open Access Transmission Tariff ("OATT") administration, regional transmission planning and coordinated regional reliability operations.

Q: Please describe the benefits associated with an OATT.

A: KCPL currently serves its native load under the SPP OATT. Additionally, most service provided on KCPL's transmission system to parties other than KCPL is administered through the SPP OATT. The SPP OATT provides several benefits including one-stop pricing and reservations for transmission customers across the entire SPP region, non-discriminatory transmission service, consistent terms and conditions of service and equitable revenue recovery. KCPL continues to maintain a small number of grandfathered point-to-point transmission reservations under the KCPL OATT but the KCPL OATT is closed except for network service and rollover extensions of existing reservations.

Q: Please describe the benefits associated with regional transmission planning.

A: SPP acts as a regional Planning Coordinator and creates plans for future transmission grid additions through its annual SPP Transmission Expansion Plan and four-month Aggregate Study process (together referred to as the "Plan"). This Plan incorporates OATT transmission service requests, generation interconnection requests, transmission owner additions and proposed economic projects. As a result of the Plan, SPP directs member transmission owners to build all necessary transmission expansions, additions and upgrades in order to provide sufficient and reliable transmission service within the region.

SPP also implements certain cost allocation methods for transmission expansion plans that allocate a portion of the investment costs to all members for those transmission additions that provide regional benefits.

Q: Please describe the benefits associated with coordinated regional reliability operations.

A: SPP serves as KCPL's Reliability Coordinator in order to meet specific reliability requirements set forth in North American Electric Reliability Corporation ("NERC") reliability standards. KCPL submits real-time and planned transmission operations information to the SPP for review and approval on a coordinated regional basis. SPP also provides critical emergency operations and black-start coordination for the region. As the Reliability Coordinator, SPP has the authority to give reliability directives to member owners in order to ensure stable and reliable bulk power grid operations.

Q: Please describe Aquila's RTO membership status.

A: Aquila is a conditional member of the Midwest Independent Transmission System Operator ("MISO") RTO. Certain regulatory approvals are still pending for continued participation. Due to the potential of KCPL and Aquila having membership in separate RTOs, KCPL will evaluate the strategy of RTO membership when the merger is completed. It is anticipated that certain specific conditions Aquila currently has in process for approvals, including interconnection agreements and the release of functional control to an RTO, will be considered within a plan for RTO participation. Also, consideration will be given to the results of a pending consulting study evaluating the benefits of Aquila's full participation in various RTO options including SPP and MISO. There are significant benefits for operating the resulting combined organization within a single RTO structure. The following are benefits KCPL would expect to derive from a single RTO membership:

1. Membership in a single RTO will avoid transmission seam issues between KCPL and Aquila. Establishing the SPP-MISO seam outside the companies' areas may reduce the number of flowgates on the companies' transmission facilities that will have transmission capacity allocated between the two RTOs. In general, keeping the RTO seam outside KCPL's and Aquila's area will simplify the management of transmission capacity and increase the flexibility of power transactions.
2. Maintaining a single RTO structure will reduce costs related to support and participation in stakeholder activities such as governance, market development, transmission planning and expansion, reliability standards development and tariff administration. Furthermore, participating in one RTO will achieve additional savings by allowing one regional transmission tariff, which simplifies administration and minimizes revenue recovery applications and tariff filings to the Federal Energy Regulatory Commission.
3. Cost allocation methods with a single RTO structure for future transmission upgrades will maintain consistency across both companies, thereby ensuring coordinated transmission cost sharing, lower administrative costs, and more congruent investment structures. It also will facilitate consistent retail rate structures for that portion of retail rates associated with transmission expenditures and investments.
4. Transmission planning and expansion will be more effective from one RTO due to inclusion of both companies' facilities in one planning

process that develops regional solutions. KCPL and Aquila being in separate RTO transmission expansion plans could result in solutions that are not only inefficient or redundant for the companies, but also possibly conflicting.

5. Finally, a single structure for reliability coordination ensures the consistent development and adherence to bulk power reliability standards and criteria. While all owners, operators and users of transmission facilities must meet grid-wide NERC reliability criteria, specific reliability criteria also exist for each region. Attempting to meet two separate sets of regional reliability criteria adds unnecessary additional burdens and can have the potential for conflicting criteria. Therefore, effectively managing operations, planning and other critical functions related to the reliability of the transmission grid will be best facilitated with one set of regional criteria, which will be provided if both companies operate entirely within the control of only one regional reliability entity.

Q: Does that conclude your testimony?

A: Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Joint Application of Great Plains Energy Incorporated, Kansas City Power & Light Company, and Aquila, Inc. for Approval of the Merger of Aquila, Inc. with a Subsidiary of Great Plains Energy Incorporated and for Other Requester Relief	))))))	**Case No. EM-2007-____**

AFFIDAVIT OF RICHARD A. SPRING

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

Richard A. Spring, being first duly sworn on his oath, states:

1. My name is Richard A. Spring. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Vice President, Transmission Services.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Great Plains Energy Incorporated and Kansas City Power & Light Company consisting of eleven (11) pages and Schedules RAS-1 through RAS-6, all of which 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.

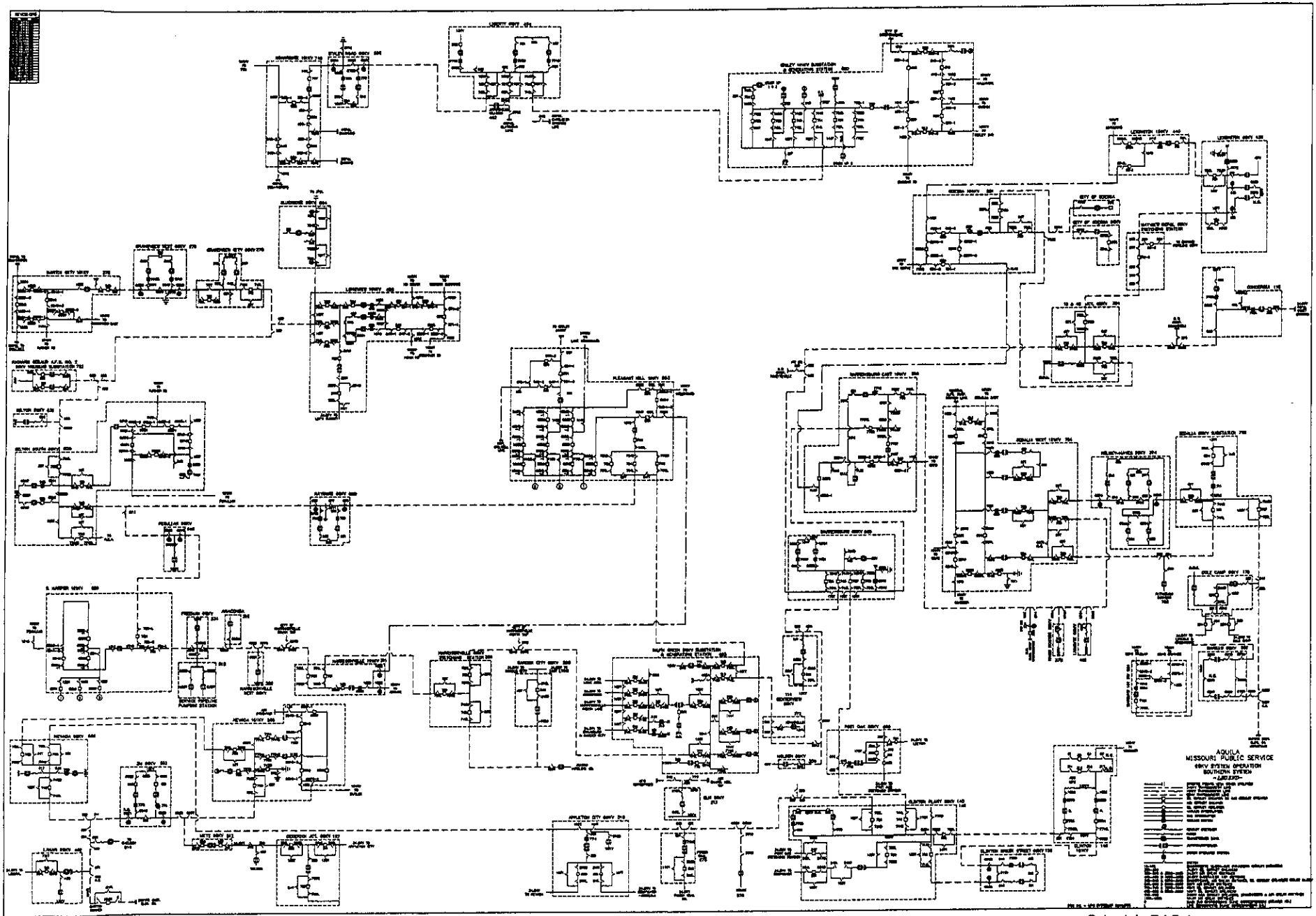
Richard A. Spring
RICHARD A. SPRING

Subscribed and sworn before me this 2nd day of April 2007.

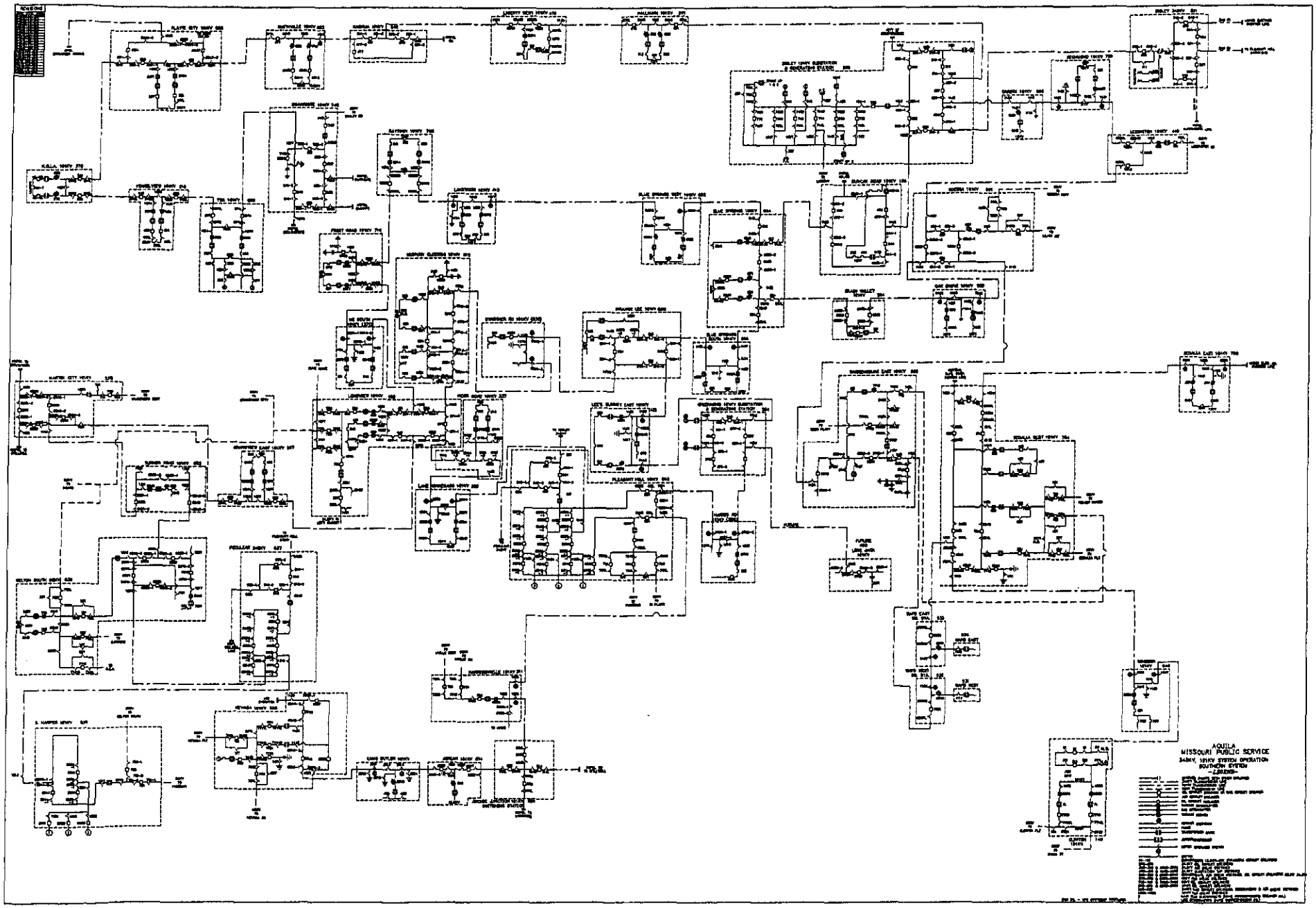
Nicole A. Wehry
Notary Public

My commission expires: Feb. 4, 2011

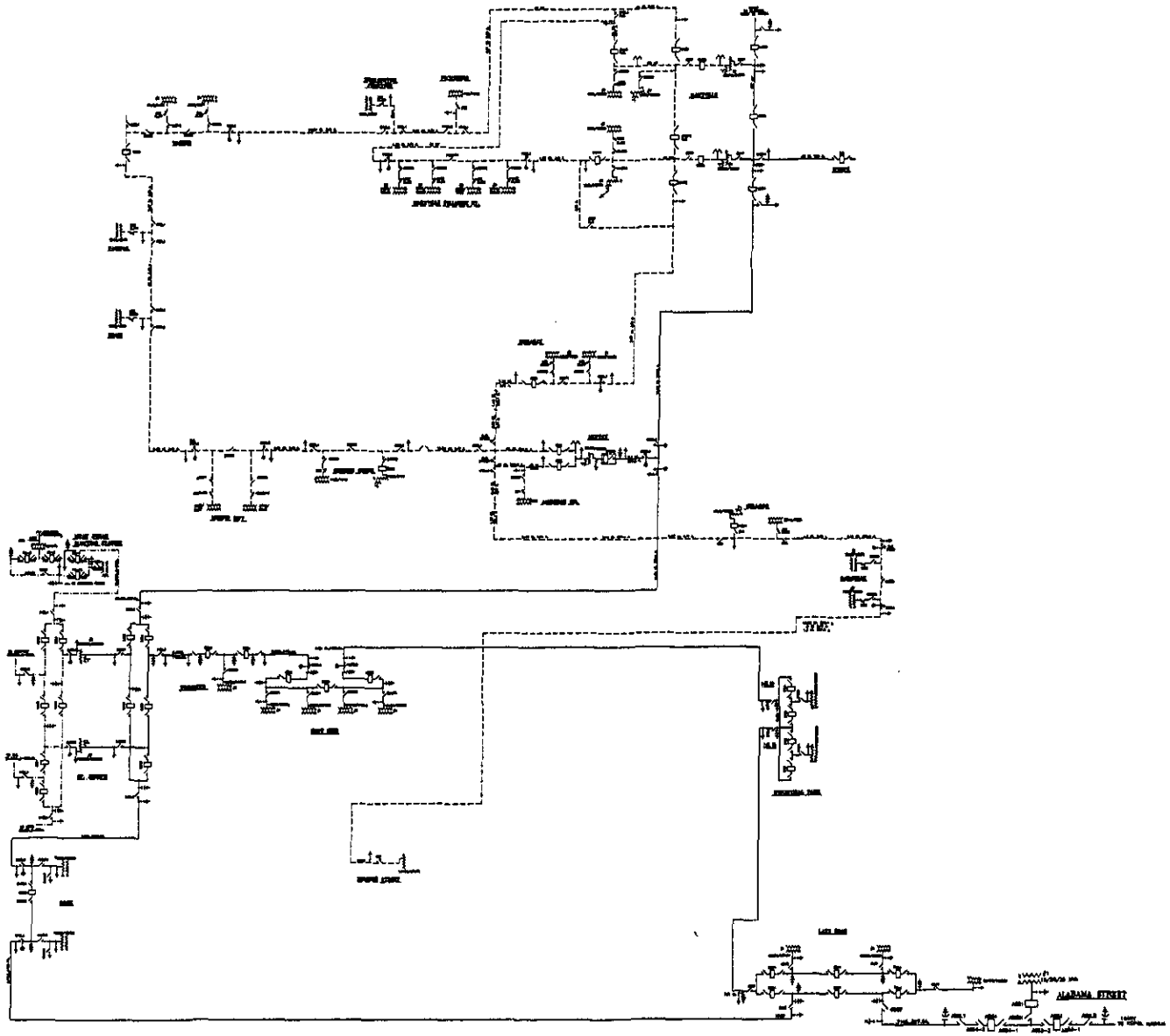
"NOTARY SEAL"
Nicole A. Wehry, Notary Public
Jackson County, State of Missouri
My Commission Expires 2/4/2011
Commission Number 07391200



Schedule RAS-1



Schedule RAS-2

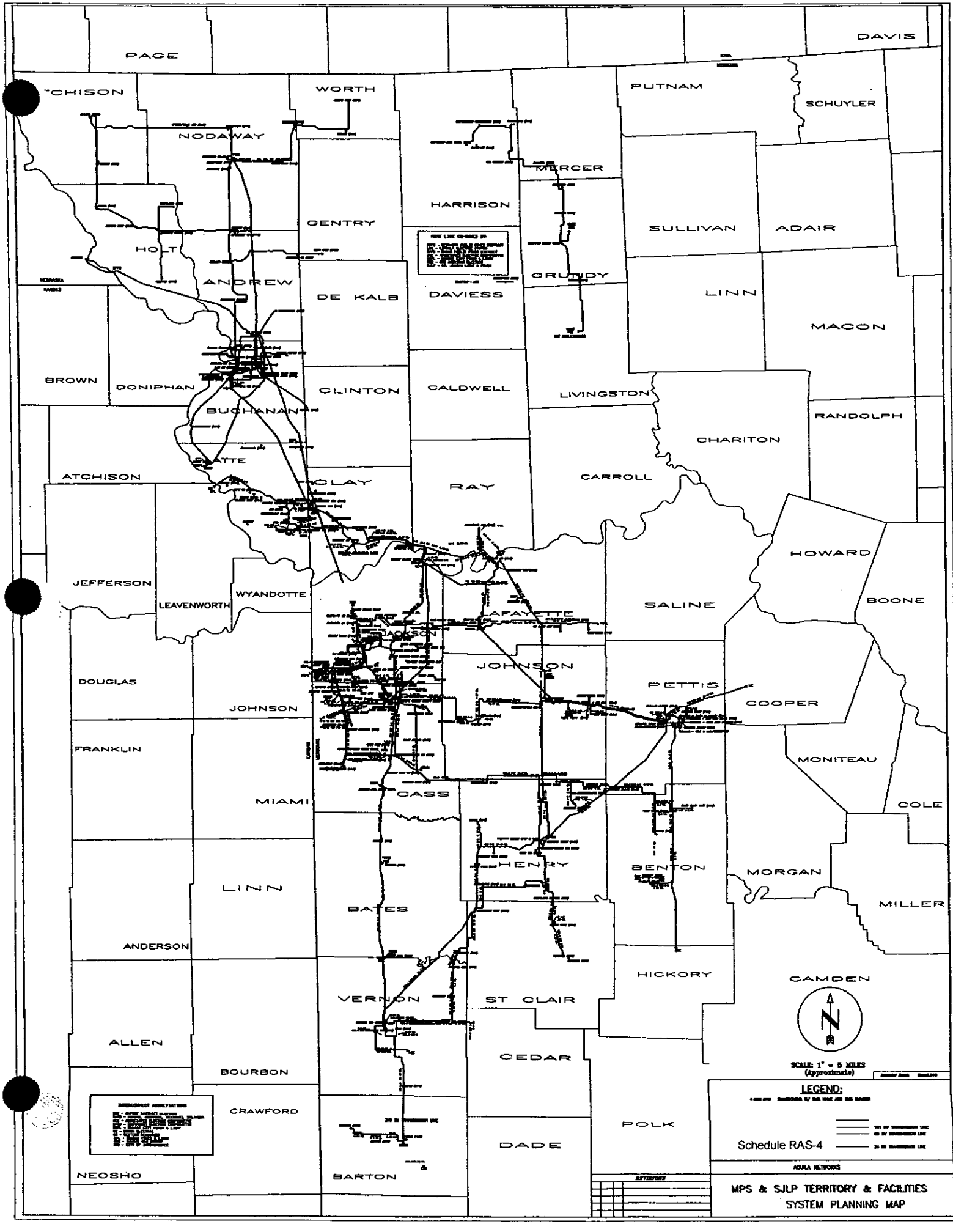


Schedule RAS-3

THE ST. JOSEPH LIGHT & POWER CO.
ST. JOSEPH, MISSOURI

ST. JOSEPH LIGHT & POWER CO.
TRANSMISSION SYSTEM
ONE LINE DIAGRAM

SJLP SYSTEM MAP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ALLEN
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CRAWFORD
POLK
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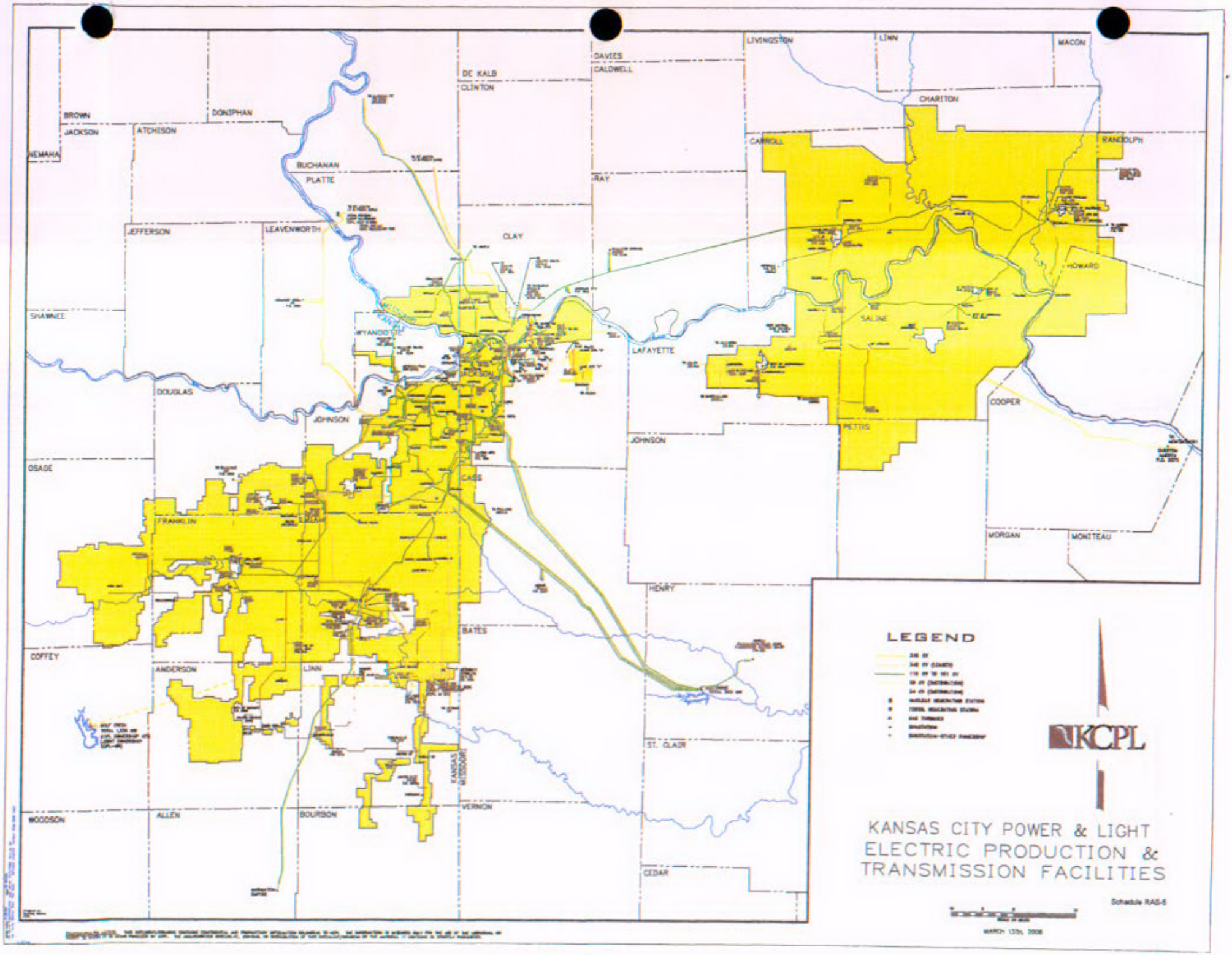
BARTON
SCALE: 1" = 5 MILES
(Approximate)
LEGEND:
Schedule RAS-4
AQUILA NETWORKS
MPS & SJLP TERRITORY & FACILITIES
SYSTEM PLANNING MAP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ANDERSON
LINN
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KANSAS
MISSOURI
WOODSON
ALLEN
BOURBON
VERNON
CEDAR
LEGEND
KCPL
KANSAS CITY POWER & LIGHT
ELECTRIC PRODUCTION &
TRANSMISSION FACILITIES
Schedule RAS-6
MARCH 13th, 2008

METRO AREA TRANSMISSION MAP
APRIL 2006