Exhibit No.:

Issue: Great Plains Energy Incorporated's Commitment

to Transource Energy, LLC and Transource Missouri, LLC and Benefits to Great Plains

Energy Incorporated

Witness: Michael L. Deggendorf

Type of Exhibit: Direct Testimony
Sponsoring Party: Transource Missouri, LLC
Case No.: EA-2012-

Date Testimony Prepared: August 31, 2012

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EA-2012-

DIRECT TESTIMONY

OF

MICHAEL L. DEGGENDORF

ON BEHALF OF

TRANSOURCE MISSOURI, LLC

August 2012

- 1 Q: Please state your name and business address.
- 2 A: My name is Michael L. Deggendorf. My business address is 1200 Main Street, Kansas
- 3 City, Missouri, 64105.
- 4 Q: By whom and in what capacity are you employed?
- 5 A: I am employed by Kansas City Power & Light Company ("KCP&L") as Senior Vice
- 6 President Corporate Services. I also sit on the Board of Managers ("the Board") for
- 7 Transource Energy, LLC ("Transource").
- 8 Q: On whose behalf are you testifying?
- 9 A: I am testifying on behalf of KCP&L, KCP&L Greater Missouri Operations Company
- 10 ("GMO"), and Great Plains Energy Incorporated ("GPE"), as well as Transource and
- 11 Transource Missouri, LLC ("Transource Missouri").
- 12 **Q:** What are your responsibilities?
- 13 A: As Senior Vice President Corporate Services, I oversee the construction program of
- both KCP&L and GMO, and the Corporate Safety and Facilities departments of KCP&L.
- 15 Q: Please describe your education, experience, and employment history.
- 16 A: I have a Bachelor of Science degree in business administration from Iowa State
- 17 University in Ames, Iowa, and have completed graduate work in business administration
- at the University of Colorado in Colorado Springs, Colorado and at the University of
- 19 Iowa in Iowa City, Iowa. I am a graduate of the Advanced Management Program at
- Harvard University.

GPE is a public utility holding company and does not own or operate any significant assets other than the stock of its operating subsidiaries KCP&L and GMO. KCP&L, through its employees and resources, is currently taking steps to move forward on the projects described herein on behalf of itself, as well as on behalf of GMO, pursuant to the October 10, 2008 Joint Operating Agreement between KCP&L and GMO. Subsequent references in this testimony to GMO's responsibilities with respect to the projects are made in this context.

1	Before taking my current position in 2011, I was Senior Vice President -
2	Delivery, where I led transmission and distribution operations for KCP&L and GMO,
3	with specific responsibility for compliance under rules and regulations of the Federal
4	Energy Regulatory Commission ("FERC") and the North American Electric Reliability
5	Corporation ("NERC"). Prior to joining KCP&L in 2002, I served as Vice President of
6	Market Services at UtiliCorp United Inc., later known as Aquila Networks. I have more
7	than 28 years of experience in the energy and telecommunications industries.

8 Q: Please describe your participation in industry organizations.

- A: Among other organizations, I have served on the board of directors at the Midwest Energy Association and on an advisory committee at the Electric Power Research Institute. I currently serve on the Members Committee of the Southwest Power Pool, Inc. ("SPP").
- 13 Q: Have you previously testified in a proceeding before the Missouri Public Service

 14 Commission ("Commission" or "MPSC")?
- 15 A: No.

16 **Q:** What is the purpose of your testimony?

- 17 A: The purpose of my testimony is to demonstrate the benefits of Transource and
 18 Transource Missouri to GPE's regulated electric utility subsidiaries, as well as GPE's
 19 commitment to the long-term success of Transource and Transource Missouri.
- 20 **Q:** Please describe GPE.
- A: GPE is the holding company of KCP&L and GMO, operating utilities that deliver electricity to more than 823,000 customers in Kansas and Missouri. GPE is headquartered in Kansas City, Missouri. GPE's operating companies own over 2,600

miles of transmission lines in SPP operating at voltages up to 345kV. KCP&L's and GMO's transmission systems include approximately 448 miles of 345kV lines, 1,452 miles of 161kV lines, 691 miles of 69kV lines, and 778 miles of 34kV lines. Both KCP&L and GMO are members of, and have transferred functional control over their transmission facilities to, SPP. With the exception of certain grandfathered agreements, service over KCP&L's and GMO's transmission facilities is provided pursuant to the SPP Open Access Transmission Tariff ("SPP Tariff").

Q: Why is GPE participating in Transource?

A:

GPE formed Transource with American Electric Power Company, Inc. ("AEP") to: (i) develop the Missouri portion of two regionally-funded, high-voltage, wholesale transmission projects approved by SPP - the 345kV Iatan-Nashua Project and the 345kV Sibley-Nebraska City Project (collectively the "Projects"); and (ii) pursue regional competitive transmission projects. Transource provides a number of benefits to the Projects and to GPE.

First, Transource provides immediate benefits to the Projects by reducing capital pressures on GPE to fund the regional Projects and providing extensive project execution and procurement expertise. The opportunity to construct new regional transmission projects comes at a time when vertically-integrated utilities such as KCP&L and GMO are faced with the competing capital demands for addressing environmental compliance, renewable portfolio standards, aging infrastructure, NERC reliability, and cyber-security issues. Consequently, constructing the Projects through Transource eases GPE's current capital requirements for the Projects, while allowing KCP&L to continue to be the utility responsible for the operation and maintenance of these transmission facilities located in

Missouri. Additionally, AEP is considered one of the premier transmission owners and operators in the United States. AEP brings national project execution experience and established relationships with critical suppliers of materials needed for constructing and operating high-voltage transmission facilities.

Second, Transource is an excellent vehicle for GPE to expand its participation in the evolving market for constructing and operating regional transmission projects with a trusted and experienced partner. Today's regulatory landscape requires a new business model for enabling vertically integrated utilities, such as KCP&L and GMO, to continue their participation in providing regional transmission services. Specifically, FERC Order No. 1000 will result in the removal of an incumbent utility's federal right of first refusal to construct, own, and operate certain regional transmission facilities. Instead, utilities soon will be required to compete for the opportunity to build regional, high-voltage transmission projects, even those within their service areas. GPE understands the implications that FERC Order No. 1000 has on the electric transmission industry, and Transource provides an opportunity for GPE, a company with local operations in Missouri, to actively participate in opportunities created with this recent federal directive.

Additionally, the greater scale and scope of these regional projects can substantially magnify the related technological, financial, and operational challenges associated with regional transmission projects. This also supports a new model for addressing these challenges. It calls for an entity focused exclusively on the construction and operation of regional transmission projects, one that can obtain resources and funding based exclusively on that business and respond to the unique challenges of this evolving segment of the industry. Transource is an entity that will provide GPE an expanded

capability to meet the challenges of participating in the market for regional transmission projects within and outside of its traditional operating utility footprint.

More detail and development of the transmission industry concerning regional transmission projects and the associated regional cost allocation is in the Direct Testimony of Todd E. Fridley in Case No. EO-2012-0367.

What is GPE's capital investment in transmission assets?

A:

Q:

A:

Through KCP&L and GMO, GPE has added approximately \$260M (or approximately \$380M including pre-acquisition Aquila additions) in new transmission plant over the past ten years. GPE is committed to continuing to make investments for local transmission system upgrades through KCP&L and GMO. These investments are regarded by GPE as a primary focus to ensure that our reliability and service commitments to our customers continue to be met. GPE will make additional investments in regional transmission infrastructure, both Missouri and non-Missouri regional projects, through Transource. To highlight the levels of investment required for regional projects, it is notable that the estimated capital expenditures for the Projects, approximately \$450M, will exceed GPE's operating companies' transmission plant additions (including pre-acquisition Aquila) combined over the past ten years.

Q: What is GPE's total capital investment?

Through KCP&L and GMO, GPE has made approximately \$4.7B in utility capital expenditures over the past ten years. GPE and its subsidiaries have been able to maintain investment grade credit ratings throughout the recent period of capital investment, but the continued investment in all aspects of a vertically integrated utility will continue to put pressure on credit ratings. GPE is forecasted to make an additional \$2.1B in total capital

expenditures from 2012 through 2014, with approximately \$500M of the capital expenditures being mandatory environmental retrofits to existing generation assets.

How will GPE provide financial support to Transource?

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GPE will provide equity funding for Transource. Equity funding for Transource will be proportional to the ownership percentage of each parent company, so GPE will contribute 13.5% of the equity needs of Transource. In terms of debt financing, Transource and its subsidiaries will arrange for and secure its own debt financing through a combination of bank facilities and long-term debt capital markets. The Direct Testimony of Antonio P. Smyth describes in additional detail how Transource and Transource Missouri will finance their investments.

What strengths does GPE provide to Transource?

For the Projects, GPE, through its operating companies, provides ongoing project management through a multi-function, multi-discipline project management team, consisting of employees and contractors with wide-ranging expertise in areas including transmission engineering, construction, planning, procurement, real estate, environmental, legal, regulatory, communications, and public affairs. The management of the Projects is described in the Direct Testimony of Brent C. Davis. GPE, through its operating companies, will continue to provide these services after the Projects are novated to Transource Missouri, as well as providing operations and maintenance services after the Projects become operational. Through Transource, KCP&L will provide operations and maintenance labor through services and support agreements.

Beyond the Projects, GPE provides regulatory, policy, and transmission planning expertise to Transource within the states and regional transmission organizations in

which KCP&L and GMO operate. KCP&L and GMO also possess local experience for transmission projects in rights-of-way, land acquisition, construction, operations, and maintenance activities. These strengths will be extremely valuable as Transource pursues regional transmission projects in Missouri and surrounding areas.

A:

Q:

A:

Please provide a specific example of the GPE operating companies' project management skills and their commitment to the communities in which they operate.

GPE's operating utilities have a long history of strong infrastructure investment and reliable utility operations in Kansas and Missouri. The successful completion of the Iatan

Unit 2 supercritical coal-fired power plant is a recent example of the long-term commitment that GPE and its subsidiaries make to complex regional projects in a collaborative manner across a broad spectrum of stakeholders. The Commission found in its April 12, 2011 Report and Order in KCP&L's last rate case, Case No. ER-2010-0356, that Iatan Unit 2 "was constructed during a challenging economic climate and finished within three months of the original target date," noting that the "evidence establish[ed] that KCP&L actively managed the Iatan Project and put the proper controls in place." The Iatan Unit 2 project is an excellent example of the long-term commitment and

Q: Is GPE committed to the long-term success of Transource and Transource Missouri?

dedication that GPE brings to successfully complete its projects.

Yes. GPE, through its operating companies, will actively participate in the development and construction of the Projects and the ongoing business of Transource in pursuing competitive regional transmission projects. KCP&L, like AEP, has dedicated resources to this new venture. Importantly, the national reputation of Transource will depend

heavily on the success of Transource Missouri, as Transource Missouri will be developing the first regional transmission projects for Transource and will serve as an example to regulators in other jurisdictions. Moreover, Transource is also one of the first entities to be formed to respond to FERC Order No. 1000. Consequently, many industry observers will be attentive to its performance. If GPE's long-term vision for Transource is to become a reality, Transource Missouri must deliver on the Projects and must deliver in a well-executed and competent manner. It is my firm belief that Transource will be successful and meet its objectives.

- 9 Q: Does this conclude your testimony?
- 10 A: Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Transource Missouri, LLC for a Certificate of Convenience and Necessity Authorizing it to Construct, Finance, Own, Operate, and Maintain the Iatan-Nashua and Sibley- Nebraska City Electric Transmission Projects. Case No		
AFFIDAVIT OF MICHAEL L. DEGGENDORF		
STATE OF MISSOURI)) ss COUNTY OF JACKSON)		
Michael L. Deggendorf, being first duly sworn on his oath, states:		
1. My name is Michael L. Deggendorf. I work in Kansas City, Missouri, and I am		
employed by Kansas City Power & Light Company ("KCP&L") as Senior Vice President - Corporate		
Services. I also sit on the Board of Managers for Transource Energy, LLC ("Transource").		
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf		
KCP&L, KCP&L Greater Missouri Operations Company, and Great Plains Energy Incorporated, as well		
as Transource and Transource Missouri, LLC consisting of Light (S) 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. Michael L. Deggendorf		
Subscribed and sworn before me this day of August, 2012.		
Notary Public Notary Public NICOLE A. WEHRY Notary Public - Notary Seal State of Missouri Commission Expires: February 04, 2015 Commission Number: 11391200		