Exhibit No .:

Issues:

Fuel Model; Purchase Power

Witness:

Leon C. Bender

Sponsoring Party:

MoPSC

Type of Exhibit:

Rebuttal Testimony

Case No.:

ER-2001-299

Date Testimony Prepared:

May 3, 2001

FILED3

MAY 0 3 2001

Service Commission

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

REBUTTAL TESTIMONY

OF

LEON C. BENDER

THE EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2001-299

Jefferson City, Missouri May, 2001

1	REBUTTAL TESTIMONY						
2	OF						
3	LEON C. BENDER						
4		THE	EMPIRE DI	STRICT	ELECTRIC COMPA	ANY	
5			CAS	SE NO. EI	R-2001-299		
6							
7	Q.	Please sta	ate your name	and busine	ess address.		
8	A.	Leon C. Bender, P.O. Box 360, Jefferson City, Missouri, 65102.					
9	Q.	Q. Are you the same Leon C. Bender who filed direct testimony in this case?					
10	A.	Yes, I am	ı.				
11	Q.	What is the	he purpose of	your rebu	ttal testimony in this c	ase, the Em	pire District
12	Electric Company (EDE) rate case, Case No. EM-2001-299?						
13	Α.	The purpo	ose of my rebu	ittal testim	ony is to respond to the	e direct testin	nony of Greg
14	Sweet of the Empire District Electric Company (EDE) regarding the results of EDE's electric						
15	production cost model simulation that is used to establish fuel and purchased power cost for EDF						
16	for the test year.						
17	Q.	Did you	review the in	puts and o	outputs of EDE's prod	duction cost	model and
18	compare these with the Missouri Public Service Commission Staff's (Staff) inputs and outputs o						
19	Staff's production cost model?						
20	Α.	Yes, I did	l.				
21	Q. Did you find differences between Staff's inputs to its production cost model an						t model and
22	EDE's	inputs	to	its	production	cost	model.
23							

A. Yes. I found differences in the generating units, fuel prices, load, amounts and prices of purchased power, capacity contracts used and numerous minor differences.

- Q. Will you discuss these differences in this rebuttal testimony?
- A. Although the differences described above were numerous, Staff and EDE were able to reach an agreement during the pre-hearing process of this case on the total fuel and purchased power expense. A Stipulation and Agreement is being prepared at this time and has yet to be filed. The Stipulation and Agreement, if concluded and approved, will remove the need to litigate the issues that comprise fuel and purchase power expense. If for any reason the Stipulation and Agreement is not filed or is filed and not accepted by the Missouri Public Service Commission (Commission), then it will be necessary at some later date to file supplemental rebuttal testimony. If the Commission rejects the Stipulation and Agreement, the parties will attempt to resolve the issues pertaining to fuel expense and purchased power cost. To the extent that these issues cannot be resolved, the parties will need to present them for the Commission's consideration.
 - Q. Does this conclude your rebuttal testimony?
 - A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

IN THE MATTER OF THE APPLICATION OF THE EMPIRE DISTRICT ELECTRIC COMPANY FOR A GENERAL RATE INCREASE)) Case No. ER-2001-299						
AFFIDAVIT OF LEON C. BENDER							
STATE OF MISSOURI)) ss COUNTY OF COLE)							
Leon C. Bender, of lawful age, on his oath states: that he has participated in the preparation of the foregoing written testimony in question and answer form, consisting of pages of testimony to be presented in the above case, that the answers in the attached written testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.							
	Leon C. Bender						
DAWN L. HAM Notary Public State of County of Co	Notary Public						