Exhibit No .:

Issues: Rate of Return, Cost of Capital Witness: Matthew J. Barnes Sponsoring Party: MoPSC Staff Type of Exhibit: True-Up Direct Testimony Case No.: ER-2006-0314 Date Testimony Prepared: Novemberr 7, 2006

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY SERVICES DIVISION

TRUE-UP DIRECT TESTIMONY

OF

MATTHEW J. BARNES

KANSAS CITY POWER AND LIGHT COMPANY

CASE NO. ER-2006-0314



NOV 1 7 2006

Missouri Public Service Commission

Jefferson City, Missouri November 2006

> Staff Exhibit No. 152 Case No(s). ER -2006 -031L Date 116/06 nu. Rptr.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas City) Power & Light Company for Approval to Make) Certain Changes in its Charges for Electric Service) to Begin the Implementation of Its Regulatory Plan.)

Case No. ER-2006-0314

AFFIDAVIT OF MATTHEW J. BARNES

STATE OF MISSOURI)) ss. COUNTY OF COLE)

Matthew Barnes, of lawful age, on his oath states: that he has participated in the preparation of the foregoing True-Up Direct Testimony in question and answer form, consisting of 3 pages to be presented in the above case; that the answers in the foregoing True-Up Direct Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of his knowledge and belief.

tew J. Barnes

Subscribed and sworn to before me this $\int_{-\infty}^{+\infty} day \, of NOVanber$ 2006.

Motary Public



ASHLEY M. HARRISON My Commission Expires August 31, 2010 Cole County Commission #06898978

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3	MATTHEW J. BARNES
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1	TRUE-UP DIRECT TESTIMONY
2	OF
3	MATTHEW J. BARNES
4	KANSAS CITY POWER AND LIGHT COMPANY
5	CASE NO. ER-2006-0314
6	Q. Please state your name.
7	A. My name is Matthew J. Barnes.
8	Q. Are you the same Matthew J. Barnes who filed direct, rebuttal, and surrebuttal
9	testimony in this proceeding for the Staff of the Missouri Public Service Commission (Staff)?
10	A. Yes, I am.
11	Q. In your direct testimony, did you provide your expert opinion on what you
12	considered to be a fair and reasonable rate-of-return on the Missouri jurisdictional electric
13	utility rate base for Kansas City Power & Light (KCP&L or Company)?
14	A. Yes, I did.
15	Q. What is the purpose of your true-up direct testimony?
16	A. The purpose of my true-up direct testimony is to provide the Commission the
17	updated capital structure, embedded cost of long-term debt and overall rate of return as of
18	September 30, 2006 for KCP&L.
19	KCP&L'S CAPITAL STRUCTURE AS OF SEPTEMBER 30, 2006
20	Q. Please explain Staff's updated capital structure.
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True-up Direct Testimony of Matthew J. Barnes

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1	Α.	As of September 30, 2006, KCP&L's capital structure consisted of
2	53.69 percent	equity, 1.53 percent preferred stock, and 44.79 percent long-term debt. Please
3	see Schedule	1.
4	Q.	Did the embedded cost of long-term debt change as of September 30, 2006?
5	Α.	Yes. KCP&L's embedded cost of long-term debt as of September 30, 2006,
6	was calculate	d by the company to be 6.21 percent. Please see Schedule 2.
7	Q.	Why did KCP&L's embedded cost of long-term debt increase since June 30,
8	2006?	
9	А.	KCP&L's embedded cost of long-term debt increased because of the increase
10	in interest rat	tes associated with their interest rate management products. The increase of the
11	embedded co	ost of long-term debt caused Staff's rate of return to increase 10 basis points.
12	Staff now r	ecommends a rate of return for KCP&L in the range of 7.85 percent to
13	7.90 percent.	
14	Q.	Did the embedded cost of preferred stock change as of September 30, 2006?
15	А.	No. The embedded cost of preferred stock as of September 30, 2006, remained
16	the same at 4	.29 percent.
17	Q.	Did Staff change is method of determining the true-up capital structure and
18	long-term de	bt amounts?
19	A.	No. Staff did not change its method of determining the true-up capital
20	structure and	l long-term debt amounts.
21	Q.	Does Staff still recommend a return on equity (ROE) in the range of
22	9.32 percent	to 9.42 percent with a mid-point of 9.37 percent?
23	A.	Yes. Please see Schedule 3.

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True-up Direct Testimony of Matthew J. Barnes

Q.

1 SUMMARY AND CONCLUSIONS

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Please summarize the conclusions of your true-up direct testimony.

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A. My recommended cost of common equity, which is in the range of 9.32 percent to 9.42 percent, would produce a fair and reasonable rate of return of 7.85 percent to 7.90 percent for KCP&L's Missouri jurisdictional electric utility rate base.

- Q. Does this conclude your true-up direct testimony?
- A. Yes, it does.

Kansas City Power and Light Company Case No. ER-2006-0314

Capital Structure as of September 30, 2006 Great Plains Energy

Capital Component	An	Dollar nount (000's)	Percentage of Capital
Common Stock Equity	\$	1,372,092	53.69%
Preferred Stock	\$	39,000	1.53%
Long-Term Debt		\$1,144,565	44.79%
Short-Term Debt	\$	-	0.00%
Total Capitalization	\$	2,555,657	100.00%

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Electric Financial Ratio Benchmark Total Debt / Total Capital

Standard & Poor's Corporation's RatingsDirect, Revised Financial Guidelines as of June 2, 2004

i.

BBB Credit Rating based on a "6" Business Profile

48% to 58%

Notes: 1. Long-term Debt at September 30, 2006 includes current maturities of long-term debt. This balance also includes the amount of non-regulated debt. These balances were provided in KCP&L's response to DR 0552

2. Short-term debt balance net of construction work in progress (CWIP) was negative as of September 30, 2006. Therefore, no short-term debt is included in the capital structure.

Source: Kansas City Power and Light's response to Staff's Data Request No. 0552

ansas City Power and Light ED-2006-0314	
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KANSAS CITY POWER & LIGHT COMPANY AND GREAT PLAINS ENERGY

			AGNAN	s cirif rower a Weighted Avi	Weighted Average Cost of Long-Term Debt Capital	NANSAS CITT FOWER & LIGHT COMPANY AND GREAT FLAINS ENERGY Weighted Average Cast of Long-Term Debt Capital	JANG ENERGY				
				E DOMERICA A	At September 30, 2006	2006	1				
		(a)	(q)	(c)	(q)	(e)	(J)	(8)	(ų)	(1)	()
						Underwriters				Lang-term	Annual Cost
		Initial	Date of	Date of	Price to	Discounts &	Issuance	Net Proceeds	Cast to	Debt Capilal	of Long-term
Line Line	e Issue	Offering	Offering	Maturity	Public	Commissions	Expense	to Company	Company	Outstanding	Debt Capitat
Ž	KANSAS CITY POWER & LIGHT ONLY										
	General Mortgage Bonds										
-	Medium Term Notes - Series C (1)	\$150,000,000	Various	Various	\$150,000,000	\$968,050	\$572,926 (2)	\$148,459,024	8.085%	\$500,000	\$40,427
	Pledged General Mortgage Bonds										
2	EIRR 1992 Series	\$31,000,000	9/15/1992	7/1/2017					3.684%	\$31,000,000	\$1,142,040
£	EIRR Hawthorn 1993 Series - 4.0% Coupon	\$12,366,000	10/14/1993	1/2/2012					4.202%	\$12,366,000	\$519,619
4	MATES Series 1993-A	\$40,000,000	12/7/1993	12/1/2023					3.616%	\$40,000,000	\$1,446,400
ŝ		\$39,480,000	12/7/1993	12/1/2023					3.585%	\$39,480.000	\$1,415,358
9		\$13,982,500	2/23/1994	3/1/2015					4.245%	\$13,982,000	\$593,536
	EIRR La Cygne 1994 Series - 4.65% Coupon	\$21,940,000	2/23/1994	9/1/2035					4.813%	\$21,940,000	\$1,055,972
	Unsecured Notes										
7	Senior Notes Due 2007 - 6% (3)	\$225,000,000	3/13/2002	3/15/2007	\$224,538,750	\$1,350,000	\$327,659	\$222,861,091	6.325%	\$225,000,000	\$14,232,304
Ð	Senior Notes Due 2011 - 6.5% Coupon (4)	\$150,000,000	3/20/2001	11/15/2011	\$150,000,000	\$1,198,500	\$50,000	\$148,751,500	6.697%	\$150,000,000	\$10,045,902
თ	Senior Notes Due 2035 -6.05% Coupon (5)	\$250,000,000	11/17/2005	11/15/2035	\$250,000,000	\$2,187,500	\$150.000	\$247,662,500	6.146%	\$250,000,000	\$15,365,776
10											
=	Environmental Improvement Revenue Refunding Bonds	ding Bonds									
12		\$56,500,000	8/11/1998	9/1/2015					4.776%	\$56,500,000	\$2,698,440
13		\$50,000,000	8/11/1998	9/1/2015					4.774%	\$50,000,000	\$2,387,000
4	 Series 1998-C Due 2035-4.65% Coupon 	\$50,000,000	8/11/1998	9/1/2035					4.837%	\$50,000,000	\$2,418,500
15	Series 1998-D Due 2017-4.75% Coupon	\$40,000,000	8/11/1998	10/1/2017					4.774%	\$40,000,000	\$1,909,744
16											
17	Other Long-Term Debt										
18	Unamortized Discount on Senior Notes									(1,461,104 12)	20
19	Loss/(Gain) on Reaquired Debt									\$0	\$ 815,805
20	Weighted Cost of Interest Rate Management Products	oducts							I	\$ 0	\$991,236
52	Total KCP&L Long-Term Debt Capital			Ā	At September 30, 2006	16				\$379,306,836	\$57,078,059
23									n		
24	KCP&L Weighted Avg. Cost of Long-Term Debt Capital	Debt Capital		•	At September 30, 2006	2006		5.828%			
1											

Schedule 2-1

Image: International state (a) (b) (c) (d) (e) (1) </th <th></th> <th></th> <th></th> <th>waignted Av</th> <th>weignied Averäge Cost of Long-Lerm Jebi Capital At September 30, 2006</th> <th><u>д-тегт ∪еот сар</u> 2006</th> <th>10</th> <th></th> <th></th> <th></th> <th></th>				waignted Av	weignied Averäge Cost of Long-Lerm Jebi Capital At September 30, 2006	<u>д-тегт ∪еот сар</u> 2006	10				
Initial Date of Offering Date of Maturity Date of Price to Public Underwriters Decomary & Expense Initial Is is amone Long-tem Net Proceeds Long-tem Net Proceeds Long-tem Net Proceeds Long-tem Straindrg Fund IX - NDH \$163.600.000 6114/2004 216/2009 \$1,053,400 \$1,29,976 \$163,406,624 \$163,600.000 Fund IX - NDH \$3,307/767 3,307/1999 10/1/2008 \$1,053,400 \$1,29,406,624 \$471% \$163,600.000 Fund IX - NDH \$1,481,000 3/307/1999 10/1/2008 10/1/2008 \$1,53,406,524 \$1,351,626 Fund IX - NDH \$1,481,000 3/307/1999 10/1/2008 10/1/2008 \$1,53,406,524 \$1,532,406,524 \$1,532,406,526 Fund IX - NDH \$1,481,000 3/307/1999 10/1/2008 10/1/2008 \$1,53,406,524 \$1,552,406,526 \$1,552,406,526 \$1,552,406,526 \$1,552,406,526 \$1,552,406,526 \$1,552,406,526 \$1,552,406,526 \$1,552,406,526 \$1,552,406,526 \$1,552,406,526 \$1,552,406,526 \$1,552,406,526 \$1,552,406,526 \$1,552,406,526 \$1,552,406,526 \$1,552,406,5		(a)	(q)	(c)	(p)	(e)	(j)	(6)	(µ)	Ξ	0
Initial Date of Offering Date of Offering						Underwriters				Long-term	Annual Cost
Offering Offering Offering Offering Offering Offering Dublic Commissions Expense to Company Outstanding \$163.600,000 6/14/2004 216/2009 \$103,400 \$103,400 \$129,976 \$471% \$163,600,000 Fund IX - NDH \$3,907,767 3/30/1999 10/1/2008 \$103,400 \$103,400 \$103,400 \$162,406,624 \$471% \$163,600,000 Fund IX - NDH \$3,307,767 3/30/1999 10/1/2008 \$1,063,400 \$162,406,624 \$471% \$168,600 Fund IX - NDH \$3,307,767 3/30/1999 10/1/2008 \$1,063,400 \$162,406,624 \$471% \$168,600 Fund IX - NDH \$3,307,767 3/30/1999 10/1/2008 \$1,063,400 \$162,406,624 \$471% \$163,660% Fund IX - NDH \$1,481,000 3/30/1999 10/1/2008 \$10,112,008 \$1,652,88,205 \$166,626 \$166,626 \$166,626 \$166,626 \$166,626 \$166,626 \$166,626 \$166,626 \$166,626 \$166,626 \$166,626 \$166,626 </td <td></td> <td>Initial</td> <td>Date of</td> <td>Date of</td> <td>Price to</td> <td>Discounts &</td> <td>Issuance</td> <td>Net Proceeds</td> <td>Cost lo</td> <td>Debt Capilal</td> <td>of Long-term</td>		Initial	Date of	Date of	Price to	Discounts &	Issuance	Net Proceeds	Cost lo	Debt Capilal	of Long-term
\$163,600,000 6/14/2004 2/16/2009 \$163,600,000 \$1,063,400 \$1,29,976 \$182,406,624 8,471% Fund IX - NDH \$3,907,767 3/30/1999 10/1/2008 7,500% 7,500% Fund IX - NDH \$3,307,1999 10/1/2008 10/1/2008 7,500% 7,500% Fund I. NDH \$1,481,000 3/30/1999 10/1/2008 7,500% 7,500% Fund I. NDH \$1,481,000 3/30/1999 10/1/2008 10/1/2008 7,500% Fund I. NDH \$1,481,000 3/30/1999 10/1/2006 8,50% 8,42% Fund I. NDH \$1,000 3/30/1999 10/1/2006 8,42% 8,42%		Offering	Ottering	Maturity	Public	Commissions	Expense	to Company	Company	Outstanding	Debt Capital
\$163,600,000 6/14/2004 2/16/2009 \$163,600,000 \$1,063,400 \$162,406,624 8,471% Notes Notes \$1,301,1999 10/1/2008 \$163,600,000 \$1,063,400 \$162,406,624 8,471% Notes \$3,307,767 3/30/1999 10/1/2008 \$163,600,000 \$1,063,400 \$162,406,624 8,471% Credit Fund IX - NDH \$3,3001,999 10/1/2008 \$161,1000 3/30/1999 10/1/2008 \$1,600%	GREAT PLAINS ENERGY ONLY										-
\$163,600,000 61/4/2004 21/6/2009 \$163,600,000 \$1,063,400 \$162,406,624 8.471% Notes subminishing \$3,907,767 3/30/1999 10/1/2008 \$163,000,000 \$1,063,400 \$162,406,624 8.471% Outsing Fund IX - NDH \$3,307,1999 10/1/2008 10/1/2008 7600% 7600% Credit Fund I - NDH \$1,481,000 3/30/1999 10/1/2008 7600% 7600% V Long-Term Debt Capital At September 30, 2006 At September 30, 2006 8.45% 8.45%	Unsecured Notes										
Notes 7.600% ousing Fund IX - NDH \$3,307,1999 10/1/2008 7.600% Credit Fund IX - NDH \$1,481,000 3/3071999 10/1/2006 7.600% Credit Fund I. NDH \$1,481,000 3/3071999 10/1/2006 7.600% 7.600% V Long-Term Debt Capital At September 30, 2006 8.462% 4.462% 4.458	1 FELINE PRIDES	\$163,600,000	6/14/2004	2/16/2009	\$163,600,000	\$1,063,400	\$129,976	\$162,406,624	8.471%	\$163,600,000	\$13,858,279
ousing Fund IX - NDH \$3,907,767 3,301,999 10/12008 7.600% Credit Fund I - NDH \$1,481,000 3/30/1999 10/12006 7.600% Y Long-Term Debt Capital Arg. At September 30, 2006 8.452% ad Avg. Cost of Long-Term Debt Capital At September 30, 2006 8.452%	Affordable Housing Notes										
Credit Fund I - NDH \$1,481,000 3/30/1999 10/1/2006 7.600% y Long-Term Debt Capitat At September 30, 2006 \$1 \$1 ud Avg. Cost of Long-Term Debt Capital At September 30, 2006 \$8.452% \$1		\$3,907,767	3/30/1999	10/1/2008					7.600%	S1,351,524	\$102,716
y Long-Term Debt Capital At September 30, 2006 ad Avg. Cost of Long-Term Debt Capital At September 30, 2006 8.452%		\$1,481,000	3/30/1999	10/1/2006					7.600%	\$306,681 \$1,658,205	\$23,308 \$126,024
y Long-Term Debt Capitat At September 30, 2006 ad Avg. Cost of Long-Term Debt Capital At September 30, 2006 8.452%	4								·		
ad Avg. Cost of Long-Term Debt Capital At September 30, 2006		tat		At	t September 30, 20	06				\$165,258,205	\$13,984,303
ad Avg. Cost of Long-Term Debt Capital At September 30, 2006	6								1		
GREAT PLAINS ENERGY	7 GPE Only Weighted Avg. Cost of Long-Te	erm Debt Capital			At September 30,	2006		8.462%			
	GREAT PLAINS ENERGY					1				-	
				-		-					

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Kansas City Power and Light ER-2006-0314

Expenses associated with the Series C Medium Term Note issue are being amortized monthly over a 12 year period.
 Costs associated with the early issuance of Series C and Series D Medium Term Notes for retunding Series B Medium Term Notes and First Mortgage Bonds in April and May 1993 have been added to Issuance Expenses.

6.209%

At September 30, 2006

GPE Weighted Avg. Cost of Long-Term Debt Capital

(3) Expenses associated with the Senior Notes, Series A issue are being amortized monthly over a 5 year period.
(4) Expenses associated with the Senior Notes issue are being amortized quarterly over a 10 year period.
(5) Projected - Expenses associated with the Senior Notes issue are being amortized quarterly over a 30 year period.

Kansas City Power and Light Company Case No. ER-2006-0314

Weighted Cost of Capital as of September 30, 2006 for Kansas City Power and Light Company

			Weighted Cost of C	apital Using	
			Common Equity	Return of:	
Capital Component	Percentage of Capital	Embedded Cost	9.32%	9.37%	9.42%
Common Stock Equity	53.69%	****	5.00%	5.03%	5.06%
Preferred Stock	1.53%	4.29%	0.07%	0.07%	0.07%
Long-Term Debt	44.79%	6.21%	2.78%	2.78%	2.78%
Short-Term Debt	0.00%				
Total	100.00%		7.85%	7.88%	7.90%

Notes:

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Embedded Cost of Long-Term Debt and Embedded Cost of Preferred Stock Taken from Response to DR 0552.

Schedule 3