

Exhibit No.:  
Issues: Fuel Model and Purchased  
Power  
Witness: David W. Elliott  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Rebuttal Testimony  
Case No.: ER-2001-672  
Date Testimony Prepared: January 8, 2002

**FILED<sup>2</sup>**  
JAN 08 2002  
Missouri Public  
Service Commission

**MISSOURI PUBLIC SERVICE COMMISSION**  
**UTILITY OPERATIONS DIVISION**

**REBUTTAL TESTIMONY**

**OF**

**DAVID W. ELLIOTT**

**UTILICORP UNITED, INC.**  
**D/B/A MISSOURI PUBLIC SERVICE**

**CASE NO. ER-2001-672**

**Jefferson City, Missouri**  
**January 2002**

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Rebuttal testimony of  
David W. Elliott

1 Q. What is the effect on fuel and purchased power costs of correcting the  
2 error?

3 A. The result is an increase in the fuel model output of \$649,458 for the joint  
4 dispatch scenario.

5 Q. Why did the joint dispatch cost go up?

6 A. In the corrected joint dispatch scenario, the relatively lower priced energy  
7 from the capacity contract above the contract limit is displaced by relatively higher priced  
8 energy purchases or generation. Displacing the lower priced energy with a higher cost  
9 energy produced an increase in the overall cost.

10 Q. What are the revised results of the fuel model runs for this case?

11 A. The revised results are shown in Schedule 1, attached to my rebuttal  
12 testimony.

13 Q. Did you quantify the effects of annualizing test year kWh sales to 365  
14 days?

15 A. Yes. The adjustments for the model scenarios were calculated by  
16 multiplying the average scenario cost per kWh times the kWh adjustment to sales. This  
17 adjustment was provided to Staff witness William V. Harris.

18 Q. Were the revised model scenario results provided to other Staff witnesses?

19 A. Yes. The revised model scenario results were provided to Staff witnesses  
20 Michael S. Proctor and William V. Harris.

21 Q. Does this conclude your rebuttal testimony?

22 A. Yes, it does.

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

In The Matter Of The Tariff Filing Of )  
Missouri Public Service (MPS) A Division )  
Of UtiliCorp United Inc., To Implement A )  
General Rate Increase For Retail Electric )  
Service Provided To Customers In The )  
Missouri Service Area Of MPS )

Case No. ER-2001-672

**AFFIDAVIT OF DAVID W. ELLIOTT**

STATE OF MISSOURI     )  
                                      ) ss  
COUNTY OF COLE     )

David W. Elliott, of lawful age, on his oath states: that he has participated in the preparation of the foregoing written rebuttal testimony in question and answer form, consisting of 2 pages of rebuttal testimony to be presented in the above case, that the answers in the attached written rebuttal 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.



\_\_\_\_\_  
David W. Elliott

Subscribed and sworn to before me this 7<sup>th</sup> day of January, 2002.

DAWN L. HAKE  
Notary Public - State of Missouri  
County of Cole  
My commission expires Jan 9, 2005

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

My commission expires \_\_\_\_\_

**SUMMARY  
of Staff Model Runs**

	MPS Stand alone	SJLP Stand alone	JOINT
Total	\$75,483,577	\$20,533,341	\$89,535,037
Gen	\$44,829,192	\$13,850,542	\$59,231,731
Purch	\$30,654,385	\$6,682,799	\$30,303,306

### ADJUSTMENTS

	MPS Stand alone	SJLP Stand alone	JOINT
Total	\$75,483,577	\$20,533,341	\$89,535,037
Adjustment	(\$157,786)	\$0	(\$137,990)