

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

REBUTTAL TESTIMONY

OF

RICHARD J. CAMPBELL

AQUILA, INC.

D/B/A AQUILA NETWORKS - MPS

AND AQUILA NETWORKS - L&P

CASE NOS. ER-2004-0034 & HR-2004-0024 (CONSOLIDATED)

> Jefferson City, Missouri January 2004

Case No(s). FR 2004-0034 Date 2/23/04 Rptr 45

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In The Matter Of Aquila, Inc. D/B/A Aquila) Networks L&P And Aquila Networks MPS To Implement A General Rate Increase In Electricity

Case No. ER-2004-0034 & HR-2004-0024 (Consolidated)

AFFIDAVIT OF RICHARD J. CAMPBELL

)

STATE OF MISSOURI)) ss **COUNTY OF COLE**)

Richard J. Campbell, of lawful age, on his oath states: that he has participated in the preparation of the following 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.

Subscribed and sworn to before me this

day of January, 2004.

- 1 F ia of Missouri Gernit, et Cela

My commission expires

1		REBUTTAL TESTIMONY
2		OF
3		RICHARD J. CAMPBELL
4		AQUILA NETWORKS, INC.
5		D/B/A AQUILA NETWORKS – MPS
6		AND AQUILA NETWORKS – L&P
7		CASE NOS. ER-2004-0034 AND HR-2004-0024
8		(CONSOLIDATED)
9		
10	Q.	Please state your name.
11	A.	My name is Richard J. Campbell.
12	Q.	Are you the same Richard J. Campbell that previously filed direct
13	testimony in	this case?
14	А.	Yes, I am.
15	Q.	What is the purpose of your rebuttal testimony?
16	А.	The purpose of my rebuttal testimony is to introduce revised net system
17	hourly loads	for Aquila Networks - MPS.
18	Q.	Did any party raise any issue regarding net system hourly loads during the
19	prehearing c	onference?
20	А.	No issues were raised regarding the methodology I used or the
21	calculations	I performed.
22	Q.	Did the net system hourly loads for the MPS system change? Why?
		1

Rebuttal Testimony of Richard J. Campbell

1	А.	Yes, the net system hourly loads for the MPS system changed. The load							
2	changes refle	ct adjustments to normalized customer usage made by Staff Witness							
3	Amanda McM	lellen.							
4	Q.	Did the changes in load affect any other staff witness?							
5	А.	Yes. I supplied the revised hourly loads to Staff witness David Elliott.							
6	Q.	Did any party raise any issue regarding the weather normalization or days							
7	adjustments to	o usage that you presented in your direct testimony during the prehearing							
8	conference?	· · · · ·							
9	A.	No issues were raised regarding the methodology I used or the							
10	calculations I performed.								
11	Q.	Did any party raise any other issue regarding normal weather variables							
12	during the prehearing conference?								
13	А.	No issues were raised regarding the methodology I used or the							
14	calculations I	performed.							
15	Q.	Does this conclude your rebuttal testimony?							
16	А.	Yes, it does.							
l									

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Aquila Networks MPS Net System Load Normalized for 2002 ER-2004-0034

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	Mont	Monthly Peaks (MW)				Load Factor				
Month	Actual	Normal	Adj	% Adj	Actual	Normal	Adj	% Adj	Actual	Normal
Jan-02	445,500	501,878	56,378	12.65%	836	943	108	12.90%	0.72	0.72
Feb-02	390,630	432,142	41,511	10.63%	833	909	77	9.19%	0.70	0.71
Mar-02	420,539	430,459	9,920	2.36%	795	811	15	1.92%	0.71	0.71
Apr-02	381,017	393,721	12,704	3.33%	784	722	-62	-7.97%	0.67	0.76
May-02	402,515	432,111	29,596	7.35%	1,056	1,067	11	1.06%	0.51	0.54
Jun-02	547,311	542,276	-5,034	-0.92%	1,193	1,201	8	0.69%	0.64	0.63
Jul-02	641,669	635,732	-5,937	-0.93%	1,297	1,339	42	3.24%	0.67	0.64
Aug-02	609,780	612,654	2,874	0.47%	1,309	1,327	18	1.36%	0.63	0.62
Sep-02	504,070	483,320	-20,750	-4.12%	1,238	1,232	-7	-0.53%	0.57	0.55
Oct-02	411,260	422,299	11,039	2.68%	1,031	933	-98	-9.50%	0.54	0.61
Nov-02	408,291	424,437	16,145	3.95%	763	803	40	5.20%	0.74	0.73
Dec-02	456,213	499,887	43,674	9.57%	837	910	73	8.70%	0.73	0.74
Annual	5,618,797	5,810,916	192,119	3.42%	1,309	1,339	30	2.29%	0.49	0.50
Summer	2 302 831	2.273,982	-28.848	-1.25%	1,309	1,339	30	2.29%	0.60	0.58

Summer	2,302,831	2,273,982	-28,848	-1.25%	1,309	1,339	30	2.29%	0.60	0.58
Other	3,315,966	3,536,933	220,967	6.66%	1,056	1,067	11	1.06%	0.54	0.57