

Exhibit No.:  
Issues: Engineering Review  
Witness: David W. Elliott  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Surrebuttal Testimony  
File No.: ER-2010-0355  
Date Testimony Prepared: January 5, 2011

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY OPERATIONS DIVISION**

**SURREBUTTAL TESTIMONY**

**OF**

**DAVID W. ELLIOTT**

**KANSAS CITY POWER & LIGHT COMPANY**

**FILE NO. ER-2010-0355**

*Jefferson City, Missouri*

*January 2011*

*Staff* Exhibit No. 214  
Date 1-26-11 Reporter tw  
File No. ER-2010-0355

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

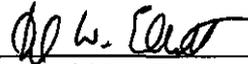
In the Matter of the Application of Kansas )  
City Power & Light Company for )  
Approval to Make Certain Changes in its )  
Charges for Electric Service to Continue )  
the Implementation of Its Regulatory Plan )

File No.: ER-2010-0355

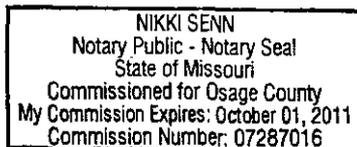
**AFFIDAVIT OF DAVID W. ELLIOTT**

**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 following Surrebuttal Testimony in question and answer form, consisting of 2 pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal 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 5<sup>th</sup> day of January, 2011.



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

1 | **SURREBUTTAL TESTIMONY**

2 | **OF**

3 | **DAVID W. ELLIOTT**

4 | **KANSAS CITY POWER & LIGHT COMPANY**

5 | **FILE NO. ER-2010-0355**

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12 | Q. Please state your name and business address.

13 | A. David W. Elliott, P.O. Box 360, Jefferson City, MO 65102.

14 | Q. Are you the same David W. Elliott employed by the Missouri Public Service  
15 | Commission (Commission) that contributed to Staff's Construction Audit and Prudence  
16 | Review of Iatan Construction Project for Costs Reported as of June 30, 2010, filed on  
17 | November 4, 2010 in this case?

18 | A. Yes.

19 | Q. What is the purpose of your surrebuttal testimony?

20 | A. The purpose of my surrebuttal testimony is to address statements made by  
21 | Kansas City Power & Light Company (KCPL) witness Chris B. Giles in his rebuttal  
22 | testimony in this case related to the Iatan Construction Project.

23 | Q. Mr. Giles makes the following statement, "However, I note that Staff's Mr.  
24 | David Elliott has had no such difficulties identifying or explaining the cost variances over the  
25 | Iatan project CBEs [Control Budget Estimates]." (Giles rebuttal page 12, lines 7 and 8) Do  
26 | you agree with this statement?

27 | A. No. I did not identify or explain cost variances over the Iatan project CBEs. I  
28 | reviewed the approved change orders over \$50,000 to understand the reason for the change  
29 | order and determine if there were any engineering issues or concerns with the change order. I

Surrebuttal Testimony of  
David W. Elliott

1 | explain this review on page 28 in Staff's Construction Audit and Prudence Review of Iatan  
2 | Construction Project for Costs Reported as of June 30, 2010, filed on November 4, 2010:

3 |           Engineering Staff review construction project change orders associated  
4 |           with the project for the following:

- 5 |           • To understand the reason for the change at the point in time  
6 |           when the change order was issued;
- 7 |           • To determine whether the change corrected an engineering-  
8 |           related problem, resulted in a better design, or improved the operation  
9 |           or construction of the plant; and
- 10 |           • To determine whether the change resulted in a safety concern,  
11 |           caused unnecessary construction, or caused unnecessary duplication of  
12 |           facilities or work.

13 |           Q.    Mr. Giles makes the following statement, "Mr. Elliott's analysis clearly shows  
14 |           that cost overruns to the Iatan Project's CBEs are both identified and explained." (Giles  
15 |           rebuttal page 15, lines 10 and 11) Do you agree with that statement?

16 |           A.    No. I did not identify or explain cost overruns to the Iatan Project CBEs. I  
17 |           reviewed the approved change orders over \$50,000 to understand the reason for the change  
18 |           order and determine if there were any engineering issues or concerns with the change order. I  
19 |           explain this review on page 28 of Staff's Construction Audit and Prudence Review of Iatan  
20 |           Construction Project for Costs Reported as of June 30, 2010, filed on November 4, 2010 as  
21 |           described in detail above.

22 |           Q.    Are you the Staff member responsible to make the recommendation of what  
23 |           cost overruns of the Iatan project should be allowed?

24 |           A.    No. I am not.

25 |           Q.    Does this conclude your surrebuttal testimony?

26 |           A.    Yes, it does.