Exhibit No.: 113
Issues: Construction Costs; Amortization Expense; Depreciation
Witness: Cary G. Featherstone
Sponsoring Party: MoPSC Staff
Type of Exhibit: Direct Testimony
Case No.: ER-2006-0314
Date Testimony Prepared August 8, 2006

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY SERVICES DIVISION

DIRECT TESTIMONY

OF

CAREY G. FEATHERSTONE

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2006-0314

Jefferson City, Missouri
August 2006

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 CARY G. FEATHERSTONE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

Cary G. Featherstone, of lawful age, on his oath states: that he has participated in the preparation of the foregoing Direct Testimony in question and answer form, consisting of 33 pages to be presented in the above case; that the answers in the foregoing 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.

Cary G. Featherstone

Subscribed and sworn to before me this 7th day of August 2006.

TONI M. CHARLTON
Notary Public - State of Missouri
My Commission Expires December 28, 2008
Cole County
Commission #04474301

TONI M. CHARLTON
NOTARY SEAL
NOTARY PUBLIC
STATE OF MISSOURI

TABLE OF CONTENTS

CARY G. FEATHERSTONE

GREAT PLAINS ENERGY and KANSAS CITY POWER & LIGHT COMPANY

ELECTRIC

CASE NO. ER-2006-0314

DIRECT TESTIMONY

OF

CARY G. FEATHERSTONE

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2006-0314

Q. Please state your name and business address.

A. Cary G. Featherstone, Fletcher Daniels State Office Building, 615 East 13th Street, Kansas City, Missouri.

Q. By whom are you employed and in what capacity?

A. I am a Regulatory Auditor with the Missouri Public Service Commission (Commission).

Q. How is your testimony organized?

A. I have organized my direct testimony by areas as follows:

1. My credentials
2. Introduction
3. Executive Summary
   Overview of Kansas City Power & Light's filing
3. Brief history of Kansas City Power & Light
4. Comprehensive Energy Plan
5. Amortization of Plant Investment Resulting from Stipulation and Agreement in Case No. EO-94-199
6. Wolf Creek Nuclear Generating Station Increase in Depreciation Life from 40 Years to 60 Years
7. Regulatory Asset for Demand Response, Efficiency and Affordability Programs
8. Construction Cost Audit of KCPL Generating Units
9. KCPL's Generating Facilities
10. Rate Base Treatment of KCPL's Generating Units Declared In-Service
11. Spearville Wind Generating Units

CREDENTIALS

Q. Please describe your educational background.

A. I graduated from the University of Missouri at Kansas City in December 1978 with a Bachelor of Arts degree in Economics. My course work also included study in the field of Accounting.

Q. What has been the nature of your duties while in the employ of this Commission?

A. I have assisted, conducted, and supervised audits and examinations of the books and records of public utility companies operating within the state of Missouri. I have participated in examinations of electric, industrial steam, natural gas, water, sewer and telecommunication companies. I have been involved in cases concerning proposed rate increases, earnings investigations and complaint cases as well as cases relating to mergers and acquisitions and certification cases.

Q. Have you previously filed testimony before this Commission?

A. Yes. Schedule 1 to this testimony is a summary of rate cases in which I have submitted testimony. In addition, Schedule 1 also identifies other cases where I directly supervised and assisted in audits of several public utilities, but where I did not file testimony.

Q. With reference to Case No. ER-2006-0314, have you examined and studied the books and records of Great Plains Energy Incorporated and Kansas City Power & Light Company (KCPL or Company) regarding the electric operations of Kansas City Power & Light?

A. Yes, with the assistance other members of the Commission Staff (Staff).

Q. What knowledge, skill, experience, training and education do you have in with regard to KCPL's application in Case No. ER-2006-0314?

A. I have acquired knowledge of the ratemaking and regulatory process through my employment with the Commission and through my experience and analyses in numerous prior rate cases, complaint cases, merger cases and certificate cases before the Commission. I have participated in many rate cases involving several electric companies and, specifically, several previous KCPL rate cases, earnings reviews, merger cases and certificate cases, and filed testimony on a variety of topics related to these cases. I have also acquired knowledge of these topics through review of Staff work papers from prior rate cases brought before this Commission relating to KCPL. Specifically, as it relates to topics surrounding this case, I have previously examined generation and generation related topics; conducted and participated in several construction audits, specifically the costs of construction projects relating to power plants. I have also been involved in the fuel and fuel-related areas for power plant production on numerous occasions. I have reviewed the Company's testimony, work papers and responses to data requests addressing the particular matters raised by KCPL in its application for a rate increase of approximately $55.8 million or 11.5% on an annual basis.

In my years at the Commission, I have also been involved in construction audits of several generating units installed by Missouri utilities, including:

Kansas City Power & Light Company – Wolf Creek Nuclear Generating Station

AmerenUE – Callaway Nuclear Generating Station

Empire District Electric – State Line 1, 2 and Combined Cycle Unit

Aquila, Inc., Networks - MPS – South Harper Generating Station

In addition, my college coursework primarily included accounting, auditing and economics classes.

INTRODUCTION

Q. What is the purpose of your direct testimony?

A. I will provide direct testimony on the areas of: 1) KCPL's Comprehensive Energy Plan; 2) construction audits of the generating plant additions of KCPL, along with Staff witness David W. Elliott of the Commission's Electric Department; 3) the amortization resulting from the Commission's approval of the Stipulation and Agreement in Case No. EO-94-199; 4) the proper accounting of Wolf Creek Nuclear Generating Station depreciation relating to the increase in that units' useful life from 40 years to 60 years as a result of the Commission's approval of the Stipulation and Agreement in Case No. EO-2006-0329; 5) the amortization of costs associated with KCPL's demand response, efficiency and affordability programs also as a result of the Commission's approval of the Stipulation and Agreement in Case No. EO-2006-0329.

I will provide testimony on the Company's new combustion turbine generating facilities named Hawthorn 6 and 9, 7 and 8, West Gardner 1 through 4 and Osawatomie 1. In particular, I am addressing the valuation of these units along with Staff witness Elliott. Staff witness Phillip K. Williams will also testify on various aspects on the generating facilities, including the calculation of allowance for funds used during construction (AFDC) and the proceeds KCPL received from insurance recoveries and lawsuit settlements resulting from the re-building of Hawthorn 5 from the February 17, 1999, explosion that substantially destroyed that coal-fired generating unit.

Q. What adjustments are you sponsoring?

A. I am sponsoring adjustment S-55.4 to the income statement for the amortization of costs associated with KCPL's demand response, efficiency and affordability programs. I am also sponsoring in rate base an amount as of June 30, 2006, for these programs costs not yet amortized reflected as a Regulatory Asset.

I am sponsoring in rate base an amount for an amortization that has accumulated for 10 years which is found in paragraph 1.C. of the Stipulation and Agreement approved by the Commission in Case No. EO-94-199, which was a customer class cost of service and comprehensive rate design case that also turned into a rate reduction case for KCPL.

EXECUTIVE SUMMARY

Q. Please summarized your testimony.

A. Staff has reviewed the construction costs of capacity additions for combustion turbines made by KCPL over the last several years and is satisfied that these units were properly accounted for in the Company's plant in service records and properly included in rate base investment. Staff does not have concerns that the construction costs were not proper for these units and believes that the final costs for these turbines, related equipment and their installation and construction should be included at the values that KCPL currently has in its plant records.

Staff is including in this case an off-set to rate base relating to the accumulated amortization costs that KCPL has been booking to its records since Commission approval of the Stipulation and Agreement in Case No. EO-94-199. As part of a rate reduction resulting from an earnings review of KCPL rates, KCPL agreed to an amortization of plant investment, although not specifically identified to particular assets. This amount has accumulated for over 10 years and is currently $34.9 million at June 30, 2006. This amount will continue to increase until the new rates in this case become effective on January 1, 2007. The amount at

June 30, 2006, will be $35.8 million and at December 31, 2006, will be $36.7 million. These amounts will continue to be used as an offset to rate base until some future time.

As part of the Experimental Regulatory Plan, Wolf Creek Nuclear Generating Station's depreciation rate change based on a 60-year life instead of the original 40-year life. This resulted in the need to identify the difference between the depreciation expense using these two lives. The amount of change in depreciation using the two rates is being treated in the depreciation reserve for this generating unit in this case.

Staff is including an amount for amortization of costs for Demand Response, Efficiency and Affordability Programs (Customer Programs) agreed to in the KCPL Experimental Regulatory Plan in Case No. EO-2005-0329. An amount for a Regulatory Asset is also being included in this case.

OVERVIEW OF KCPL FILING

Q. Why did Staff audit KCPL in this case?

A. On February 1, 2006, KCPL filed a general rate increase case for its Missouri electric operations. The Commission assigned the case, Case No. ER-2006-0314. KCPL filed tariffs that were designed to implement an increase in its Missouri electric retail rates for its Missouri retail customers, exclusive of franchise and occupational taxes, corresponding to a revenue increase to KCPL of $55.8 million annually. This rate request represents an overall 11.5% increase over existing KCPL Missouri rates.

Q. Did the KCPL Experimental Regulatory Plan anticipate a rate filing by KCPL?

A. Yes. The Experimental Regulatory Plan provided for the first of a possible four rate cases to be filed on February 1, 2006. This first rate case and last of the four possible rate cases are required to be filed with the second and third rate cases optional. The last rate case, identified as Rate Filing # 4 (2009) in the Experimental Regulatory Plan (page 41 of the Stipulation and Agreement) will have rate schedules with an effective date of September 1, 2010, and is planned to be filed with the Commission on October 1, 2009, or eight (8) months prior to the commercial in service operation date of Iatan 2.

The series of rate cases is to address the on-going infrastructure additions to KCPL's capacity needs and environmental requirements to its major coal-fired generating facilities.

Q. How did Staff perform its audit of KCPL?

A. Staff submitted data requests to KCPL for response by KCPL personnel and consultants and conducted interviews of KCPL personnel. KCPL held a number of meetings in Jefferson City for the parties to the rate case at which it made available certain KCPL personnel and consultants to discuss certain facets of its rate case. In addition to reviewing KCPL's responses to Staff's data requests, Staff reviewed Great Plains Energy Board of Directors meeting minutes, Annual Reports to Shareholders and United States Security and Exchange Commission (SEC) Form 10-Ks and 10-Qs. Staff reviewed Great Plains Energy and KCPL's external auditor work papers and requested copies of selected work papers considered relevant. Staff visited plant facilities including the Hawthorn 5 Generating Station. Staff has participated in the Integrated Resource Planning (IRP) meetings held twice a year and reviewed documents relating to KCPL's capacity planning process. In particular, Staff attended several IRP meetings where the Company's need for and construction of generating facilities were topics of discussion.

In addition, I participated in the process noted below that resulted in KCPL's Experimental Regulatory Plan that was filed in Case No. EO-2005-0329.

BRIEF HISTORY OF KANSAS CITY POWER & LIGHT

Q. Please give a brief history of KCPL's utility operations in Missouri.

A. KCPL was the predecessor company of Great Plains Energy. Great Plains Energy incorporated in 2001 as a Missouri corporation. It is a public utility holding company. KCPL is wholly owned subsidiary of Great Plains Energy.

Great Plains Energy Form 10-K for the year-ended December 31, 2005, which is filed with the SEC identifies KCPL as follows:

> KCP&L, a Missouri corporation incorporated in 1922, is an integrated, regulated electric utility, which provides electricity to customers primarily in the states of Missouri and Kansas. KCP&L's wholly owned subsidiary, Home Service Solutions Inc. (HSS), sold its wholly owned subsidiary Worry Free Service, Inc. (Worry Free) in February 2005 and completed the disposition of its interest in R.S. Andrews Enterprises, Inc. (RSAE) in June 2003. After these sales, HSS has no active operations.
>
> KCP&L, headquartered in Kansas City, Missouri, engages in the generation, transmission, distribution and sale of electricity. KCP&L serves approximately 500,000 customers located in all or portions of 24 counties in western Missouri and eastern Kansas. Customers include approximately 440,000 residences, over 55,000 commercial firms, and over 2,200 industrials, municipalities and other electric utilities. KCP&L's retail revenues averaged approximately 82% of its total operating revenues over the last three years. Wholesale firm power, bulk power sales and miscellaneous electric revenues accounted for the remainder of utility revenues. KCP&L is significantly impacted by seasonality with approximately one-third of its retail revenues recorded in the third quarter. KCP&L's total electric revenues averaged approximately 45% of Great Plains Energy's revenues over the last three years. KCP&L's income from continuing operations accounted for approximately 88%, 86% and 67% of Great Plains Energy's income from continuing operations in 2005, 2004 and 2003, respectively.
>
> [Source: page 7, 2005 SEC Form 10-K]

KCPL provides utility service within the metropolitan Kansas City area in both Missouri and Kansas. Missouri retail revenues represent approximately 57% of KCPL's total utility operations over the past three years. The remaining portion of KCPL's operations are the Kansas and FERC wholesale jurisdictions.

KCPL owns 47% of the 1,166 megawatt Wolf Creek Nuclear Generating Station that became operational 1985. The Company owns and operates a 70% share of the coal-fired Iatan Generating Station; a 50% share of the coal-fired LaCygne Station Units 1 and 2; 100% of the coal-fired Hawthorn 5 Station; and 100% of the coal-fired Montrose Station Units 1, 2 and 3. KCPL owns and operates 100% of the combined cycle generating facility Hawthorn Units 6 and 9. KCPL also owns and operates 100% of the natural gas-fired combustion turbines referred to as Hawthorn Units 7 and 8, West Gardner Units 1 through 4 and Osawatomie Unit 1. The Company owns and operates 100% of the eight oil-fired combustion turbines at Northeast Station. KCPL's total generating capacity is 4,053 megawatts.

KCPL owns and operates over 1,700 miles of transmission lines, approximately 9,000 miles of overhead distribution lines and over 3,700 miles of underground distribution lines in Missouri and Kansas.

COMPREHENSIVE ENERGY PLAN

Q. What is the purpose of this section of your testimony?

A. The purpose of this section is to provide the Commission an overview of KCPL's capacity planning through 2010 with what is referred to as its Comprehensive Energy Plan. The 2005 Great Plains Energy Annual Report identifies the KCPL Comprehensive Energy Plan as "one key element of our [GPE's] Strategic Intent." The Great Plains Energy Strategic Intent is explained in the 2005 Annual Report as:

> Great Plains Energy's Intent, which is to demonstrate leadership in supplying and delivering electricity and energy solutions to meet our customer's needs, was launched nearly two years ago. In 2005, we continued executing our Strategic Intent.
>
> We use five key areas to measure our progress:
>
> - Achievement of top-tier operating performance
> - Implementation of KCP&L's Comprehensive Energy Plan
> - Success in the competitive supply business through Strategic Energy
> - Realization of Great Plains Energy's "Winning Culture"
> - Development and strengthening of relationships with our communities
>
> Our collaborative approach of working with all constituents...from employees to customers to regulators and civic and community leaders...is the key to our success. It proves there is indeed progress through partnership.
>
> Our Strategic Intent represents the hard work of thousands of individuals and is our vision for the type of company we want to be...both now and in the future...one that creates value for our shareholders and provides innovative energy solutions to our customers for years to come.
>
> We accomplished much in 2005 and are very proud of our efforts. However, much work remains to be done, and our Strategic Intent will continue to guide everything we do.
>
> [Source: page 2, 2005 Annual Report]

Q. What is KCPL's Comprehensive Energy Plan?

A. The 2005 Annual Report states the following with regard to the KCPL Comprehensive Energy Plan:

> One key element of our [GPE's] Strategic Intent is KCP&L's Comprehensive Energy Plan. Working in close collaboration with key stakeholders, KCP&L developed the Plan to meet the economic, environmental and energy needs of the rapidly growing Kansas City region. In 2005, we [GPE] achieved a major milestone with unanimous approval of the regulatory stipulations regarding the Comprehensive Energy Plan from the Kansas Corporation Commission and the Missouri Public Service Commission.

> Key elements of the Plan include:
>
> - $733 million for KCP&L's portion of a high-efficiency coal-fired plant scheduled to be in service in 2010
> - $272 million in environmental upgrades at two of our existing facilities to improve the air quality in our region through significant reductions in regulated emissions
> - $166 million for 100 megawatts of wind generation
> - $95 million in demand management, distributed generation, customer efficiency and affordability programs, as well as transmission and distribution improvements
>
> We [GPE] already have started implementing the Comprehensive Energy Plan. In 2006, we will break ground on both our wind facility in Spearville, Kan., and the Iatan 2 coal-fired plant near Weston, Mo. The wind facility is being developed and built by enXco, Inc., a leading firm in wind generation projects. Kansas City engineering firm Burns & McDonnell will provide detailed engineering design services for Iatan 2. Burns and McDonnell also will provide KCP&L with project and construction management support for the project.
>
> In addition, we will start the installation of new emissions control equipment at Unit 1 of the LaCygne Generating Station with completion scheduled by May 2007. KCP&L's Comprehensive Energy Plan will result in significant system-wide reductions of sulfur dioxide, nitrogen oxides, mercury and fine particulate emissions – even with the addition of new generation.
>
> [Source: page 4, 2005 Annual Report]

Q. Is the main component of KCPL's Comprehensive Energy Plan the construction of a new base load coal-fired generating unit?

A. Yes. While there are several elements to KCPL's Comprehensive Energy Plan, by far the most significant feature is the construction of Iatan 2, among the first coal-fired base load generation in this region since the completion of the sister unit, Iatan 1 in May 1980 and the Westar Energy's Jeffrey Energy Center Unit 3, in 1983. The Iatan 2 project was the major component of the KCPL Regulatory Plan filed as a Stipulation and Agreement (Stipulation) on March 28, 2005, in Case No. EO-2005-0329. KCPL and several entities, including the Office of Public Counsel (Public Counsel) and the Staff agreed to a plan that was intended to permit the Company to construct Iatan 2 and make environmental enhancements to Iatan 1 and LaCygne Units 1 and 2. During the time of construction of Iatan 2 and the environmental upgrades, KCPL would be allowed the opportunity to maintain its credit worthiness while the Company experiences financial pressure in engaging in these construction projects.

Q. Did the Commission approve the KCPL Regulatory Plan?

A. Yes. The Commission approved the Stipulation on July 28, 2005.

Q. How does the Experimental Regulatory Plan allow KCPL the opportunity to maintain its credit worthiness?

A. One of the elements, among others, is that KCPL is to file as few as two (2) and as many as four (4) rate cases during the five-year period of construction cycle. The rate case filed by KCPL on February 1, 2006, is the first of the two (2) required rate cases. The other required rate case is also the last of the possible four (4) rate cases and is to be timed to include the in-service date of Iatan 2. A significant facet of providing KCPL the opportunity to maintain its credit worthiness, i.e., its debt at investment grade rating, is the provision for additional amortizations in these rate cases so that certain of KCPL's financial ratios (Funds from Operations Interest Coverage ratio and Funds from Operations as a Percentage of Average Total Debt ratio) at least meet the lower end of the top third of the BBB range.

Q. Did you participate in KCPL Regulatory Plan process?

A. Yes. I attended most of the workshops and meetings regarding the development of the KCPL Experimental Regulatory Plan. The workshops were conducted under Case No. EW-2004-0596. Staff and other participants submitted data requests to KCPL and KCPL supplied responses in that case. Staff also conducted an abbreviated earnings/revenues audit of KCPL to determine whether KCPL's rates needed to be rebased. KCPL had initially filed an application on May 6, 2004, to establish a docket to investigate its future supply, delivery and pricing of electric service. The Commission created Case No. EO-2004-0577 to consider KCPL's request. Pursuant to KCPL's request, the Commission created Case No. EW-2005-0596. As the result of all of these dockets, I participated in the process that resulted in KCPL's Experimental Regulatory Plan that was filed in and designated as Case No. EO-2005-0329.

Q. Did KCPL develop a regulatory plan in Kansas for the Comprehensive Energy Plan?

A. Yes. A very similar, but not identical regulatory plan was approved by the Kansas Corporation Commission on August 5, 2005, in Docket No. 04-KCPE-1025-GIE. The parties to KCPL's Kansas case submitted a Stipulation and Agreement to the Kansas Corporation Commission on April 27, 2005, requesting approval of the Kansas regulatory plan.

AMORTIZATION OF PLANT INVESTMENT RESULTING FROM STIPULATION AND AGREEMENT IN CASE NO. EO-94-199

Q. Please describe the amortization that appears as an off-set in the rate base schedule, Schedule 2.

A. This amortization amount relates to a Stipulation and Agreement entered into by KCPL and several parties in Case No. EO-94-199 resulting from an earnings review of KCPL rates in the context of that case. On July 3, 1996, the Commission approved in that case a rate reduction of $9 million to commence on July 9, 1996, and $11 million to commence no later than May 1, 1997. As part of the rate reduction KCPL agreed to an amortization of plant investment, although not specifically identified by particular assets. KCPL agreed to increase its expenses by booking an amortization amount of $3.5 million annually to be accumulated to reduce plant in service in the future. This had the effect of reducing overall earnings of the Company and provided future benefit of being used as an off-set to rate base. This provision was negotiated in lieu of further rate reductions by the parties. Section 1.C. of the Stipulation and Agreement approved by the Commission in Case No. EO-94-199 states:

> KCPL shall be authorized to book the depreciation rates shown on Appendix E, commencing with the effective date of the Commission's order approving this Stipulation and Agreement. These rates increase KCPL's annual Missouri jurisdictional depreciation expense by approximately $5.5 million. Furthermore, KCPL will book an amortization totaling $3.5 million annually upon approval of this Stipulation and Agreement, which amortization shall continue until the Commission approves a change either: (1) upon agreement of the parties made with due regard to KCPL's then-existing earnings situation, or (2) in the course of a general rate proceeding. This does not preclude KCPL from requesting that this amortization be directed toward a specific plant accounts or from requesting additional changes in depreciation rates that may result from depreciation studies.
>
> [Source: page 2, Stipulation and Agreement in Case No. EO-94-199]

Q. What amount has Staff used as an offset to rate base?

A. The amortization amount has accumulated for over 10 years and is currently $34.9 million at June 30, 2006. This amount will continue to increase till the new rates in this case become effective on January 1, 2007. The amount at June 30, 2006, will be $35.8 million and at December 31, 2006, will be $36.7 million. These amounts will continue to be used as an offset to rate base until some future time.

Q. Did the KCPL Experimental Regulatory Plan address this amortization from Case No. EO-94-199?

A. Yes. The continuation of this amortization at $3.5 million annually is covered at page 17, under section III.B.1.h. Current Amortization, of the Stipulation and Agreement in Case No. EO-2005-0329 and was approved by the Commission with the rest of the Stipulation and Agreement:

> KCPL will continue to include as a component of cost of service $3.5 million in Missouri jurisdictional expense, from the effective date of this Agreement until the effective date of the tariffs resulting from Rate Filing #1, per Paragraph III.B.3.a of this Agreement, to be filed in 2006, for rates effective in 2007. KCPL shall maintain adequate records that identify the $3.5 million of annual amortization expense originally authorized in *Re Customer Class Cost of Service and Comprehensive Rate Design Investigation of Kansas City Power & Light Company,* Order Approving Stipulation and Agreement, Case No. EO-94-199, 5 Mo.P.S.C.3d 76 (1996) on a state specific basis, by vintage year so that Missouri customers will receive recognition, of the amortization funds they have provide, in the determination of rate base for the Missouri jurisdiction, in future rate proceedings.

Q. Has KCPL reflected a similar amount for amortization expense respecting Case No. EO-94-199 in its February 1, 2006 direct filing?

A. Yes. KCPL and Staff are in agreement respecting the level that should be included in the rate case. While the June 30, 2006, amount is reflected in this direct filing, the September 30, 2006 amount will be included in the true-up.

WOLF CREEK NUCLEAR GENERATING STATION INCREASE IN DEPRECIABLE LIFE FROM 40 YEARS TO 60 YEARS

Q. Is there an increase in Wolf Creek Nuclear Generating Station depreciable life?

A. Yes. In the KCPL Experimental Regulatory Plan approved by the Commission in Case No. EO-2005-0329 on July 28, 2005, the depreciable life of the Wolf

Creek Nuclear Generating Station (Wolf Creek) changed from 40 years to 60 years [Report and Order in Case No. EO-2005-0329, page 30].

The amount relating to the difference between a 40-year life and a 60-year life for Wolf Creek that has accumulated since the Commission approved KCPL's Experimental Regulatory Plan in August 2005 is $9.5 million as of June 30, 2006. This is expected to grow to approximately $12.1 million by September 30, 2006, the true-up period in this case. It is estimated that at December 31, 2006, this amount will be $14.6 million.

The Stipulation at page 24, under Section III.B.1.n. Wolf Creek Depreciation, states as follows relating to this change:

> Upon the effective date of this Agreement, KCPL will begin recording depreciation expense for the Wolf Creek Nuclear Generating Station based on a 60-year life span. The Signatory Parties agree the Commission should authorize KCPL to use depreciation rates for the various nuclear plant accounts, as contained in Appendix G "Depreciation & Amortization Rates, Missouri Jurisdictional".

Furthermore, the Stipulation states as follows at page 32:

> The Signatory Parties agree that the portion of the amortization expense as provided for in Paragraph III.B.1.i. allocated to Missouri shall reflect the cash flow effect of any difference in depreciation expense due to different service lives (currently 40 years for Missouri and 60 years for Kansas) between Missouri and Kansas with respect to the Wolf Creek Nuclear Generating Station. The Signatory Parties recognize that the failure to recognize this difference will result in Missouri retail customers providing cash flows in excess of the equitable level provided via the special amortization and depreciation expense for Wolf Creek.

Q. Has KCPL reflected treatment of Wolf Creek depreciation based on a 60-year life in its case?

A. Yes. KCPL and Staff are in agreement.

Q. What would be the effect of not reflecting the amortization resulting from the difference between a 40-year life and a 60-year life for depreciation for Wolf Creek?

A. Not reflecting this amortization related to the difference between a 40-year life and a 60-year life results in KCPL receiving a greater cash flow from its Missouri customers than is warranted. Since rates were not immediately changed as part of the KCPL Experimental Regulatory Plan approved in August 2005, KCPL continued to collect in rates depreciation expense for Wolf Creek based on a 40-year life. The Signatory Parties to the KCPL Experimental Regulatory Plan contemplated that since a cash flow increase would result when KCPL began depreciating Wolf Creek using a 60-year life, an additional amortization would be necessary and made provision in the Stipulation for addressing this matter in the first rate case to be filed by the Company.

Q. Did Staff have to reflect the amount of accumulated depreciation reserve differently than it would have absent the change in Wolf Creek's depreciation rates?

A. Yes. Because the depreciation rate change in the KCPL Experimental Regulatory Plan related to Missouri operations only, Staff had to split the accumulated depreciation reserve for Wolf Creek into two different lines — one to reflect the non-60 year deprecation change on a total KPCL basis that is allocated to Missouri operations and the second line for the depreciation rate change that relates only to Missouri and is entirely assigned to the Missouri jurisdiction. These two lines can be seen on Accumulated Depreciation Reserve, Schedule 6, under the Wolf Creek section.

Q. Have KCPL's ratepayers benefited from the higher Wolf Creek depreciation rates the last 20 years when a 40-year life has been used for Wolf Creek rather than a 60-year life?

A. Yes. The advantage of using a 40-year life to base depreciation on is that this higher rate resulted in the depreciation reserve being higher from over 20 years of Wolf

Creek depreciation being based on this rate. The greater depreciation reserve reduces plant in service by a greater amount than if Wolf Creek's depreciation rates had been set at 60 years from the beginning of Wolf Creek's operation in 1985.

The KCPL Experimental Regulatory Plan addressed this situation at page 18 of the Stipulation in Case No. EO-2005-0329:

> KCPL shall record additional amortization expense in the amount of $10.3 million on an annual Missouri jurisdictional basis beginning with the effective date of this Agreement until the effective date of the tariffs resulting from Rate Filing #1, per Paragraph III.B.3.a of this Agreement. This amount is equal to the change in depreciation expense reflecting a change in service life span of the Wolf Creek Nuclear Generating Station from 40 to 60 years provided for in Paragraph III.A.3.n of this Agreement.

REGULATORY ASSET FOR DEMAND RESPONSE, EFFICIENCY AND AFFORDABILITY PROGRAMS

Q. Please describe the regulatory asset for Demand Response, Efficiency and Affordability Programs.

A. This item represents deferred costs relating to these programs developed in the KCPL Experimental Regulatory Plan approved by the Commission in August 2005 in Case No. EO-2005-0329. The costs included in this deferral are actual costs expended as of June 30, 2006 for these programs. These costs are captured in a deferred account and are included in rate base, Schedule 2, as a regulatory asset. The deferred costs are captured in the regulatory asset and included in rate base until the costs are amortized.

Q. What is the amortized amount?

A. The KCPL Experimental Regulatory Plan allowed for an amortization of these costs incurred to date in the 2006 rate case which is Case No. ER-2006-0314. Adjustment S-55.4 is the amortization for these deferred costs.

Q. How did Staff determine that this treatment for these costs is appropriate?

A. This treatment was agreed to in KCPL's Experimental Regulatory Plan approved by the Commission in Case No. EO-2005-0329. Paragraph III.B.3.a.v., at page 33 of the Stipulation and Agreement states as follows:

> Demand Response, Efficiency and Affordability Programs. The 2006 Rate Case will also include an amortization related to the Demand Response, Efficiency and Affordability Programs, as more fully described in Paragraph III.B.5 below. The Signatory Parties agree not to contest this amortization on any basis other than KCPL's failure to prudently implement the Demand Response, Efficiency and Affordability Programs described in Paragraph III.B.5 below.

Q. Where did the amounts Staff used in this case come from?

A. The KCPL Experimental Regulatory Plan established an advisory group of interested Signatory Parties called the Customer Programs Advisory Group (Advisory Group) to advise in the development, implementation, monitoring and evaluation of the Demand Response, Efficiency and Affordability Programs. Staff is represented on the Advisory Group by Ms. Lena Mantle, Manager of the Commission's Energy Department. Ms. Mantle attends the meetings and is in direct contact with KCPL personnel who are responsible for the development and implementation of the customer programs along with other interested Signatory Parties. Ms. Mantle recently received information regarding actual costs expended on these programs through June 30, 2006. I used the amount provided by Ms. Mantle for June 30, 2006 for the regulatory asset amount and amortization.

CONSTRUCTION COST AUDIT OF KCPL GENERATING UNITS

Q. What is a construction audit?

A. A construction audit is typically conducted just prior to and during the course of a rate increase application filed by the utility where costs relating to the construction project are being requested for rate recovery. The construction audit is designed to examine expenditures for large capital additions, generally relating to power plants.

Staff has examined costs of power plants numerous times, most notably when KCPL and Union Electric, d/b/a AmerenUE built the Wolf Creek and Callaway nuclear generating facilities, respectively, in the late-1970's to the mid-1980's. Construction audits were also performed for KCPL's LaCygne 2 and Iatan 1 coal-fired generating stations. Staff also examined the construction costs relating to combustion turbine generators installed by The Empire District Electric Company (Empire) at its State Line 1 in 1995 in Case No. ER-95-279 and its State Line 2 in 1997 in Case No. ER-97-81. When State Line 2 was converted to a combined cycle unit in 2001, a construction audit was performed for those expenditures in Case No. ER-2001-299. More recently, in Empire's last rate case, Case No. ER-2004-0570, costs relating to Energy Center 3 and 4, which are simple-cycle combustion turbine generators, were examined. The latest review of construction costs relates to Aquila, Inc.'s South Harper facility. South Harper is a recently installed three-unit combustion turbine generator facility that used Siemens Westinghouse 501D 105-megawatt generating units. These units were installed and became operational in the summer of 2005. The General Electric 7EAs are the same type of combustion turbine generating units installed at KCPL's facilities in 2000 and 2003.

All of the construction audits were done in the context of rate increase applications by the specific utilities.

Q. What costs are considered in determining the costs for recovery in the retail rates of the KCPL facilities?

A. The costs to design, construct and manage the construction of the generating facilities should be considered to make a final determination of the actual cost to install the eight combustion turbine generators and heat recovery steam generator completed in 1997, 2000 and 2003 at the three KCPL generating sites, West Gardner, Osawatomie and Hawthorn. The major costs of these units are the combustion turbine generators and related equipment such as breakers and transformers and the balance of plant costs including the installation costs.

In addition, generally large construction projects such as major generating plant additions require either modifications or substantial upgrades to substations and transmission systems. As a consequence, consideration must be given to the substation and transmission network and associated costs should be included in rates if the costs are prudently and reasonably incurred.

Other significant costs that should be examined are any fuel related costs such as new natural gas pipelines or pipeline upgrades. The transportation facilities of this fuel type can be very costly and add significantly to the economics of operating the units.

Q. What Staff members were involved in the examination of KCPL's generating asset additions?

A. Staff members assigned to the review of the Company's generating facilities were Staff witnesses David W. Elliott, Utility Engineering Specialist III in the Commission's Energy Department, Staff witness Phillip K. Williams and myself, of the Commission's Auditing Department. All three of these Staff members had previous experience in the review of construction costs of power plants.

In addition, Staff witness Michael E. Taylor, Utility Engineering Specialist III in the Commission's Energy Department, performed a review of the in-service performance testing of each of the generating units brought on line by KCPL. Staff witness Taylor is providing testimony that each of the units examined met the Commission's in-service criteria agreed to by the Company in the KCPL Experimental Regulatory Plan.

Q. How did Staff perform its review of construction costs?

A. Staff members have toured each of the facilities at various times during construction and since the units were completed. Some information on the units was acquired and discussions took place prior to KCPL's February 1, 2006, rate case filing. Once KCPL filed this case, Staff submitted data requests on each unit, requesting information on authorizations, construction budgets, construction costs and change orders. Contracts for all major systems were requested by Staff. These major contracts were reviewed and copies were provided by the Company.

KCPL personnel who actually worked on each project gave an overview of each unit's construction to Staff. Staff reviewed and requested copies of specific information regarding each unit. Once this information was received, follow-up questions were submitted, either by data request or e-mail, to KCPL personnel assigned to the construction cost review as facilitators to Staff. Further interviews of project engineers were conducted with additional questions, document review and analysis. Comparisons to other plants were made to determine reasonableness of final costs. Further document review was conducted as information became available. Each project's work orders were reviewed and copies of relevant documents were requested. The final unitization was identified, reviewed and copies requested.

Q. Did Staff encounter any difficulties in performing the review of the construction costs for each of these units?

A. Yes; just the number of units needing to be reviewed created problems with resources and time commitments. There were eight natural gas-fired combustion turbine generators, one heat recovery steam generator (HRSG) and one re-built coal-fired base load generating unit to be audited. Staff had much difficulty in keeping the information regarding each unit organized and separate from the other units being audited.

Also, since in every instance the particular generating unit's construction had been completed several years previous to the audit, it was difficult for both the Company and Staff to perform the review of these costs going back in time. Personnel had moved on to other jobs or had left the Company. KCPL employees responsible for the projects provided by the Company for interviews had to rely on memories of events that took place years in the past. They were required to go back and review documentation and develop responses to questions and, in some cases, prepare analyses to identify reasons for costs changes. Construction-related documents were not organized in a manner for this type of cost review, and in many instances, could not be easily identified as to which construction project they related. In other instances, documents had to be verified to ensure that final executed copies were what was being provided for review and copying.

Q. Did Staff get the necessary information and access to personnel to get sufficient understanding of the construction activities for each of these units?

A. Yes, with exception of one generating unit. Staff believes it ultimately received adequate documentation and KCPL provided sufficient detail to allow it to reach conclusions regarding the construction costs for each of the combustion turbines and heat recovery steam generator (Hawthorn 9).

The lone exception is the Hawthorn 5 construction costs.

Q. Was Staff satisfied with the level of costs it took to construct each of the generating units it did have sufficient time to review?

A. Yes. Staff is not proposing any adjustment in cost to any of the combustion turbine generators or HRSG in this case.

Q. How did Staff treat Hawthorn 5 in this case?

A. Staff left Hawthorn 5 plant costs in rate base, with the exception of an adjustment for the allowance for funds used during construction (AFDC). This adjustment is being addressed by Staff witness Williams in his direct testimony.

Q. Is Staff's review of the Hawthorn 5 coal-fired base load generating unit complete?

A. No. Since all of the generating units that KCPL built since its last rate case, including the re-construction of Hawthorn 5 had to be examined, there was not sufficient time to complete the review of all the units. Staff completed its review of the combustion turbine generators, which is being addressed by Staff witness Elliott. However, with the complexity and size of the Hawthorn 5 construction project with all its contracts and documentation Staff did not have sufficient time to complete its review. While Staff reviewed several documents and had preliminary discussions with KCPL personnel involved with this construction project, much work needs to continue over to KCPL's next rate case before this review process is complete.

Q. Was Staff able to go through the same review process for Hawthorn 5 construction costs as it did for the combustion turbine generators?

A. No. Unfortunately, with time constraints of the filing deadline, Staff was not able to follow the same approach for Hawthorn 5 that was used for the combustion turbine generators. As an example, after the initial discussion with personnel regarding each of the combustion turbine generators construction, Staff submitted follow-up questions, and reviewed additional documentation. Follow-up discussion with KCPL construction personnel took place with further review of documentation and questions. With respect to the West Gardner and Osawatomie generating units, Staff talked to the KCPL project engineer three separate times. Staff has not had the chance to complete the review process of the Hawthorn 5 construction costs using the same information gathering approach it has used for the combustion turbine generators.

Q. Is the Hawthorn 5 construction project larger than the combustion turbine projects?

A. Yes, substantially. Hawthorn 5 is a coal-fired base load generating unit. The unit is much larger than the combustion turbine generators and has many more complex systems. The planning and building of a coal-fired base load unit takes years and requires a far larger construction crew to complete. The construction costs are far greater to build a coal-fired base load generating unit than combustion turbine generators.

In addition, the Hawthorn 5 re-construction is unique because of the circumstances surrounding the rebuilding of this unit. This unit experienced a catastrophic explosion in 1999 resulting in a complete loss of the steam generator (boiler). This loss resulted in insurance recoveries and lawsuits of equipment suppliers and vendors. The lawsuits have resulted in court cases that required the generation of extensive files and documents. These files are located at KCPL corporate offices and are maintained in many file cabinets in a secure room. Staff has only started the review of these files within the last couple weeks of the audit. It is unlikely, with the press of the remaining schedule for the KCPL case, including the construction audit of the wind turbines during the true-up portion of the case, that Staff will be able to complete the document review. Staff will not be able to complete the follow-up interview process with Hawthorn 5 personnel. In fact, Staff has questions that are outstanding regarding interviewing KCPL construction management that Staff wants to complete. For these reasons, Staff will continue the Hawthorn 5 construction cost review in the next rate case filed by KCPL, which is currently scheduled to be filed February 1, 2007, according to the KCPL Experimental Regulatory Plan.

<u>KCPL'S GENERATING FACILITIES</u>

Q. What is Hawthorn 6 and Hawthorn 9?

A. Hawthorn 6 is combustion turbine built by Siemens. It was originally designed to use dual fuel capability of natural gas and oil but had problems operating in this manner. Siemens removed the duel fuel capability at its expense so now the unit only operates as a natural gas-fired generating facility. Nooter Eriksen manufactured the Hawthorn 9 HRSG, and it was completed in July 2000.

Q. What is the total value of the Hawthorn 6 Siemens combustion turbine and Hawthorn 9 HRSG?

A. The June 30, 2006, plant in service amount for the combustion turbine generator installed as Hawthorn 6 is $43.7 million including the related generator auxiliaries, transformers and generator breakers. This amount also includes AFDC.

The June 30, 2006, plant in service amount for the Hawthorn 9 HRSG is $ 73.3 million, including AFDC.

Q. What are Hawthorn 7 and 8?

A. These generating units are combustion turbine generators manufactured by General Electric. Each of the units is a General Electric model 7EA cable of producing 77 megawatts. They were completed in May and July of 2000.

Q. What is the total value of the Hawthorn 7 and 8 generating units?

A. The June 30, 2006, plant in service amount for these combustion turbine generators installed as Hawthorn 7 and 8 are $52.4 million including the related generator auxiliaries, transformers and generator breakers. This amount also includes AFDC.

Q. What are the West Gardner units?

A. These are four combustion turbine generators located in Gardner, Kansas. Each of the units is a General Electric model 7EA cable of producing 77 megawatts. They were completed in May of 2003.

Q. What is the total value of the West Gardner generating units?

A. The June 30, 2006, plant in service amount for West Gardner 1 through 4 combustion turbine generators including the related generator auxiliaries, transformers and generator breakers are $118.8 million, including AFDC.

Q. What is the Osawatomie generating unit?

A. This combustion turbine generator is located near Osawatomie, Kansas and is a General Electric model 7EA cable of producing 77 megawatts. It was completed June of 2003.

Q. What is the total value of the Osawatomie generating unit?

A. The June 30, 2006, plant in service amount for Osawatomie 1 combustion turbine generator including the related generator auxiliaries, transformers and generator breakers is $ 31.5 million, including AFDC.

Q. Are the amounts included in the June 30, 2006, plant in service the final construction costs?

A. No. Since these generating units were completed several years ago, plant additions and retirements have occurred changing the values of each of these units at the June 30, 2006, date used in the plant in service amounts included in rate base. Also, depreciation has occurred on each of the units affecting the net book values of each of the units.

Q. What are the final construction costs for Hawthorn 5?

A. The June 30, 2006 plant in service amount for Hawthorn 5 is $436.3 million, including AFDC. However, Staff has not completed the review of Hawthorn 5 construction costs and will make a determination of what the construction costs are in a later case, as noted above.

RATE BASE TREATMENT OF KCPL'S GENRATING UNITS DECLARED IN-SERVICE

Q. Has Staff determined if Hawthorn 6 and Hawthorn 9 are in service?

A. Yes. Staff witness Taylor has determined that Hawthorn 6 combustion turbine and Hawthorn 9 HRSG; Hawthorn 7 and 8 and West Gardner 1 through 4 and Osawatomie 1 combustion turbines have performed all the in-service tests to demonstrate that the units meet the used and useful standard.

Q. When were these generating units declared in-service by KCPL?

A. Each of these units began generating electricity and went into service at different dates. KCPL declared the generating units commercial and had provisional acceptance at different dates because of the different construction schedules.

Q. Does meeting Staff's in-service criteria mean that the unit is capable of being placed in rate base?

A. While the generating units must meet the in-service criteria to be considered in the used and useful test for rate base determination, Staff's in-service criteria does not determine when the generating units should be declared commercial in-service for meeting system load requirements. Meeting Staff's in-service criteria does not determine when the generating units should be placed in plant in service, the start of depreciation and the discontinuance of allowance for funds used during construction (AFDC).

Q. When did KCPL include these generating units in plant in service?

A. Each of these units were included in plant in service at various dates. Once the units are included in plant, AFDC is discontinued and the depreciation process starts. The following table identifies the dates KCPL considered when each of the generating units were declared commercial, date of provisional acceptance, date of plant investment, and the date AFDC ended:

KANSAS CITY POWER & LIGHT COMPANY

GENERATING UNITS

Generating Unit	Commercial Operational Date	Provisional Acceptance Date	Plant in–Service	AFDC End Date
Hawthorn 6	May 1997		October 2001	N/A
Hawthorn 9	July 2000		July 2000	July 2000
Hawthorn 7	May 2000	May 2000	May 2000	May 2000
Hawthorn 8	July 2000	June 2000	July 2000	July 2000
West Gardner 1	May 2003	April 2003	June 2003	N/A
West Gardner 2	May 2003	April 2003	June 2003	N/A
West Gardner 3	May 2003	May 2003	June 2003	N/A
West Gardner 4	May 2003	May 2003	June 2003	N/A
Osawatomie	June 2003	June 2003	June 2003	N/A
Hawthorn 5 Rebuild	June 2001 Original date was 1969	June 2001	June 2001	June 2001

[Source: Date Request 230 and 464]

Q. Why did some generating units not have dates when AFDC discontinued?

A. The generating units without a date AFDC discontinued were originally leased by KCPL. The Company terminated the lease and acquired these generating units on the dates they were placed in plant in service. Since these generating units were leased, KCPL did not include AFDC during construction.

Q. How does KCPL define commercial operation date?

A. KCPL identified how the term commercial operation date is used in a response to a data request. The Company stated that:

> Commercial Acceptance/ Operation Date refers to the date when the generating unit has met all of its performance tests and control of the loading is turned over to the system dispatcher.

Also, KCPL stated that the "provisional acceptance date refers to the date the generating unit demonstrates its operational requirements as defined in its Contract Agreement." The Company used the term "in-service date" as the "date at which the generating unit is included in electric plant in service and is considered to be used and useful". [Source: Data Request No. 464]

Q. When did each of the generating units start being dispatched by KCPL to meet system load requirements?

A. Each of the generating units identified in the above table went commercial shortly after its construction was completed, with the exception of Hawthorn 6, became "fully operational" and became capable of meeting KCPL's customers load requirements on the dates of its commercial operation. Even though Staff had not determined that the generating units had met the in-service criteria until this case,

Q. Should all the combustion turbine generating facilities be included in rate base in this case?

A. With Staff's review and the in-service performance testing complete with each unit having met the in-service criteria agreed to in the Regulatory Plan, Staff witness Taylor is recommending that each of the generating units should be considered fully operational and used for service. Therefore, each of the generating units should be included in KCPL's regulated rate base in this case. The units should be included in rate base at the plant in service values along with the accumulated depreciation reserve values as of June 30, 2006. These values will be trued-up at September 30, 2006, values during the time of the true-up audit. The depreciation reserve values reflect the depreciation that has accumulated since the time KCPL has included the units in plant in service.

SPEARVILLE WIND GENERATING UNITS

Q. Is KCPL constructing additional generating capacity?

A. Yes. KCPL is currently constructing 100 megawatts of wind generation in western Kansas near Dodge City, Kansas. This generating facility will be known as Spearville Wind Energy Facility and is expected to be complete by the September 30, 2006, true-up date.

Q. Has Staff included any of the wind turbines in the direct filing?

A. No. None of the wind turbines were complete as of June 30, 2006. Staff will review the construction costs during the true-up phase of this case and make a recommendation as to the costs and in-service performance testing at that time.

Q. What is the Spearville Wind Energy Facility?

A. Spearville Wind Energy Facility will have 67 wind turbines each capable of generating 1.5 megawatts. The total facility will have the capability of generating 100.5 megawatts.

Q. Is the Spearville Wind Energy Facility part of KCPL's Comprehensive Energy Plan?

A. Yes. KCPL identified several projects to add generating capacity to its system over the next several years. Adding 100 megawatts of wind generation is part of this plan. In addition, adding 100 megawatts of wind energy was agreed to by KCPL in the Experimental Regulatory Plan approved by the Commission in Case No. EO-2005-0329.

Page 10 of the Commission's Order in Case No. EO-2005-0329, the Commission identifies that wind generation is part of KCPL's plan to meet future capacity needs of its system.

Q. Does conclude your direct testimony?

A. Yes, it does.

Cary G. Featherstone

SUMMARY OF RATE CASE INVOLVEMENT

Year	Case No.	Utility	Type of Testimony	Case
1980	Case No. ER-80-53	St. Joseph Light & Power Company (electric)	Direct	Stipulated
1980	Case No. OR-80-54	St. Joseph Light & Power Company (transit)	Direct	Stipulated
1980	Case No. HR-80-55	St. Joseph Light & Power Company (industrial steam)	Direct	Stipulated
1980	Case No. GR-80-173	The Gas Service Company (natural gas)	Direct	Stipulated
1980	Case No. GR-80-249	Rich Hill-Hume Gas Company (natural gas)	No Testimony filed	Stipulated
1980	Case No. TR-80-235	United Telephone Company of Missouri (telephone)	Direct Rebuttal	Contested
1981	Case No. ER-81-42	Kansas City Power & Light Company (electric)	Direct Rebuttal	Contested
1981	Case No. TR-81-208	Southwestern Bell Telephone Company (telephone)	Direct Rebuttal Surrebuttal	Contested
1981	Case No. TR-81-302	United Telephone Company of Missouri (telephone)	Direct	Stipulated
1981	Case No. TO-82-3	Investigation of Equal Life Group and Remaining Life Depreciation Rates (telephone-- depreciation case)	Direct	Contested
1982	Case Nos. ER-82-66 and HR-82-67	Kansas City Power & Light Company (electric & district steam heating)	Direct Rebuttal Surrebuttal	Contested
1982	Case No. TR-82-199	Southwestern Bell Telephone Company (telephone)	Direct	Contested

Year	Case No.	Utility	Type of Testimony	Case
1983	Case No. EO-83-9	Investigation and Audit of Forecasted Fuel Expense of Kansas City Power & Light Company (electric-- forecasted fuel true-up)	Direct	Contested
1983	Case No. ER-83-49	Kansas City Power & Light Company (electric)	Direct Rebuttal Surrebuttal	Contested
1983	Case No. TR-83-253	Southwestern Bell Telephone Company (telephone)	Direct	Contested
1984	Case No. EO-84-4	Investigation and Audit of Forecasted Fuel Expense of Kansas City Power & Light Company (electric-- forecasted fuel true-up)	Direct	Contested
1985	Case Nos. ER-85-128 and EO-85-185	Kansas City Power & Light Company (electric)	Direct	Contested
1987	Case No. HO-86-139	Kansas City Power & Light Company (district steam heating-- discontinuance of public utility)	Direct Rebuttal Surrebuttal	Contested
1988	Case No. TC-89-14	Southwestern Bell Telephone Company (telephone-- complaint case)	Direct Surrebuttal	Contested
1989	Case No. TR-89-182	GTE North, Incorporated (telephone)	Direct Rebuttal Surrebuttal	Contested
1990	Case No. GR-90-50	Kansas Power & Light - Gas Service Division (natural gas)	Direct	Stipulated
1990	Case No. ER-90-101	UtiliCorp United Inc., Missouri Public Service Division (electric)	Direct Surrebuttal	Contested

Year	Case No.	Utility	Type of Testimony	Case
1990	Case No. GR-90-198	UtiliCorp United, Inc., Missouri Public Service Division (natural gas)	Direct	Stipulated
1990	Case No. GR-90-152	Associated Natural Gas Company (natural gas)	Rebuttal	Stipulated
1991	Case No. EM-91-213	Kansas Power & Light - Gas Service Division (natural gas-- acquisition/merger case)	Rebuttal	Contested
1991	Case Nos. EO-91-358 and EO-91-360	UtiliCorp United Inc., Missouri Public Service Division (electric-- accounting authority orders)	Rebuttal	Contested
1991	Case No. GO-91-359	UtiliCorp United Inc., Missouri Public Service Division (natural gas)	Memorandum Recommendation	Stipulated
1993	Case Nos. TC-93-224 and TO-93-192	Southwestern Bell Telephone Company (telephone-- complaint case)	Direct Rebuttal Surrebuttal	Contested
1993	Case No. TR-93-181	United Telephone Company of Missouri (telephone)	Direct Surrebuttal	Contested
1993	Case No. GM-94-40	Western Resources, Inc. and Southern Union Company (natural gas-- sale of Missouri property)	Rebuttal	Stipulated
1994	Case No. GM-94-252	UtiliCorp United Inc., acquisition of Missouri Gas Company and Missouri Pipeline Company (natural gas-- acquisition case)	Rebuttal	Contested
1994	Case No. GA-94-325	UtiliCorp United Inc., expansion of natural gas to City of Rolla, MO (natural gas-- certificate case)	Rebuttal	Contested
1995	Case No. GR-95-160	United Cities Gas Company (natural gas)	Direct	Contested

Year	Case No.	Utility	Type of Testimony	Case
1995	Case No. ER-95-279	Empire District Electric Company (electric)	Direct	Stipulated
1996	Case No. GA-96-130	UtiliCorp United, Inc./Missouri Pipeline Company (natural gas-- certificate case)	Rebuttal	Contested
1996	Case No. EM-96-149	Union Electric Company merger with CIPSCO Incorporated (electric and natural gas-- acquisition/merger case)	Rebuttal	Stipulated -
1996	Case No. GR-96-285	Missouri Gas Energy Division of Southern Union Company (natural gas)	Direct Rebuttal Surrebuttal	Contested
1996	Case No. ER-97-82	Empire District Electric Company (electric-- interim rate case)	Rebuttal	Contested
1997	Case No. GA-97-132	UtiliCorp United Inc./Missouri Public Service Company (natural gas—certificate case)	Rebuttal	Contested
1997	Case No. GA-97-133	Missouri Gas Company (natural gas—certificate case)	Rebuttal	Contested
1997	Case Nos. EC-97-362 and EO-97-144	UtiliCorp United Inc./Missouri Public Service (electric complaint case)	Direct Verified Statement	Contested Commission Denied Motion
1997	Case Nos. ER-97-394 and EC-98-126	UtiliCorp United Inc./Missouri Public Service (electric)	Direct Rebuttal Surrebuttal	Contested
1997	Case No. EM-97-395	UtiliCorp United Inc./Missouri Public Service (electric-application to spin-off generating assets to EWG subsidiary)	Rebuttal	Withdrawn

Year	Case No.	Utility	Type of Testimony	Case
1998	Case No. GR-98-140	Missouri Gas Energy Division of Southern Union Company (natural gas)	Testimony in Support of Stipulation And Agreement	Contested
1999	Case No. EM-97-515	Kansas City Power & Light Company merger with Western Resources, Inc. (electric acquisition/ merger case)	Rebuttal	Stipulated (Merger eventually terminated)
2000	Case No. EM-2000-292	UtiliCorp United Inc. merger with St. Joseph Light & Power Company (electric, natural gas and industrial steam acquisition/ merger case)	Rebuttal	Contested (Merger closed)
2000	Case No. EM-2000-369	UtiliCorp United Inc. merger with Empire District Electric Company (electric acquisition/ merger case)	Rebuttal	Contested (Merger eventually terminated)
2001	Case No. ER-2001-299	Empire District Electric Company (electric)	Direct Surrebuttal True-Up Direct	Contested
2001	Case Nos. ER-2001-672 and EC-2002-265	UtiliCorp United Inc./Missouri Public Service Company (electric)	Verified Statement Direct Rebuttal Surrebuttal	Stipulated
2002	Case No. ER-2002-424	Empire District Electric Company (electric)	Direct Surrebuttal	Stipulated

Year	Case No.	Utility	Type of Testimony	Case
2003	Case Nos. ER-2004-0034 and HR-2004-0024 (Consolidated)	Aquila, Inc., d/b/a Aquila Networks-MPS and Aquila Networks-L&P (electric & industrial steam)	Direct Rebuttal Surrebuttal	Stipulated
2004	Case No. GR-2004-0072	Aquila, Inc., d/b/a Aquila Networks-MPS and Aquila Networks-L&P (natural gas)	Direct Rebuttal	Stipulated
2005	Case No. EO-2005-0156	Aquila, Inc., d/b/a Aquila Networks- MPS (electric)	Rebuttal Surrebuttal	Stipulation pending
2005	Case No. ER-2005-0436 and HR-2005-0450	Aquila, Inc., d/b/a Aquila Networks-MPS and Aquila Networks-L&P (electric & industrial steam)	Direct Rebuttal Surrebuttal	Stipulated

AUDITS WHICH WERE SUPERVISED AND ASSISTED:

Year	Case No.	Utility	Type of Testimony	Case Disposition
1986	Case No. TR-86-14 (telephone)	ALLTEL Missouri, Inc.		Stipulated
1986	Case No. TR-86-55 (telephone	Continental Telephone Company of Missouri		Stipulated
1986	Case No. TR-86-63 (telephone)	Webster County Telephone Company		Stipulated
1986	Case No. GR-86-76 (natural gas)	KPL-Gas Service Company		Withdrawn
1986	Case No. TR-86-117 (telephone)	United Telephone Company of Missouri		Withdrawn
1988	Case No. GR-88-115 (natural gas)	St. Joseph Light & Power Company	Deposition	Stipulated
1988	Case No. GR-88-116 (industrial steam)	St. Joseph Light & Power Company	Deposition	Stipulated
2004	Case No. HM-2004-0618 (industrial steam)	Trigen- Kansas City Energy purchase by Thermal North America		Stipulated
2005	Case No. GM-2005-0136 (natural gas)	Partnership interest of DTE Enterprises, Inc. and DTE Ozark, Inc in Southern Gas Company purchase by Sendero SMGC LP	Recommendation Memo	Stipulated
2006	Case No. WR-2006-0250	Hickory Hills Water Company		Contested
2006	Case No. HA-2006-0294	Trigen- Kansas City Energy		Contested