

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

In the Matter of the Application of Kansas City Power)
and Light Company for Approval to Make Certain)
Changes in its Charges for Electric Service to Begin) Case No. ER-2006-0314
the Implementation of its Regulatory Plan.)

**STAFF’S MOTION FOR LEAVE TO FILE SUPPLEMENTAL
SURREBUTTAL TESTIMONY OF STAFF WITNESS PHIL WILLIAMS**

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”) and respectfully states as follows:

1. On Friday, October 6, 2006, the Staff prefiled surrebuttal testimony of its witnesses, including the surrebuttal testimony of Staff witness Phil Williams.
2. In his prefiled direct testimony, Staff witness Phil Williams included as Schedule 1-1, a table that pertains to Staff’s adjustment for property taxes. The version of Schedule 1-1 that was attached to the surrebuttal testimony on Friday, October 6, 2006 was incorrect.
3. In surrebuttal testimony prefiled Friday, October 6, 2006, Staff witness Phil Williams’s testimony did not include his Schedule 1-2, a schedule that also pertained to Staff’s property tax adjustment.
4. The sole purpose of the supplemental surrebuttal testimony of Phil Williams submitted herewith is to present revised Schedule 1-1 and to file Schedule 1-2, which was inadvertently omitted from the testimony prefiled on October 6, 2006.
5. No party will be prejudiced by grant of this motion.

WHEREFORE, the Staff respectfully requests that the Commission issue an Order accepting the supplemental surrebuttal testimony of Staff witness Phil Williams filed October 12, 2006.

Respectfully submitted,

/s/ Jennifer Heintz

Jennifer Heintz
Assistant General Counsel
Missouri Bar No. 57128

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8702 (Telephone)
(573) 751-9285 (Fax)
jennifer.heintz@psc.mo.gov

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this October 12, 2006.

/s/ Jennifer Heintz

Jennifer Heintz

Analysis of Property Taxes

		Total Plant Dec. 31, 2005		
Plant-in-Service at Jan. 1, 2006 (Dec. 31, 2005)				
Plant Cost Capitalized (Property Taxes)		\$ 40,134,064		
Plant Cost Vehichle Property Taxes to Clearings		\$ 35,621,521		
Plant Cost of Unit Train Property-To Fuel Inv.		\$ 42,629,961		
Plant Cost of Non-Utility Property Taxes		\$ 5,183,086		
Plant Cost of Property Taxes to O&M Exp.		\$ 5,093,548,781		
Total Gross Plant		\$ 5,217,117,413		
Assessed Value as a percent of Gross Plant		13.394%		
Annualized Assessed Value per Staff Calculation		\$ 698,786,995		
The 2006 Assessed Values per Company Witness Green's rebuttal testimony and company response to Staff Data Request No. 0427.				\$ 701,885,630
Total property taxes paid as a percent of Assessed Plant in 2005		8.127%		8.127%
Total annualized property taxes		\$ 56,791,038		\$ 57,042,867
	12-Months Ended Dec. 31, 2005	Percent Distribution	Annualized Levels	
Distribution of Property Taxes Charged Per Year				
Capitalized Property Taxes	\$ 145,097	0.263%	\$ 149,592	\$ 150,255
Vehicle Property Taxes charged to Clearing Accts	\$ 483,537	0.878%	\$ 498,515	\$ 500,726
Unit Train Property Taxes Charged to Fuel Inv.	\$ 87,404	0.159%	\$ 90,111	\$ 90,511
Non-Utility Property Taxes	\$ 83,703	0.152%	\$ 86,296	\$ 86,679
Property Taxes Charged to O&M	\$ 54,284,956	98.548%	\$ 55,966,524	\$ 56,214,697
Total Property Taxes Charged Per Year	\$ 55,084,697	100.000%	\$ 56,791,038	\$ 57,042,867
Annualized Property Taxes to Expense				
Property Taxes Charged to O&M		\$ 55,966,524		\$ 56,214,697
Unit Train - Property Taxes Charged to Exp. Thru Fuel Inv.		\$ 90,111		\$ 90,511
Total Annualized Property Taxes to Expense		\$ 56,056,635		\$ 56,305,208
Test Year Property Taxes to Expense				
Property Taxes Charged to O&M =Test Year Expense		\$ 54,284,956		\$ 54,284,956
Unit Train - Property Taxes Charged to Exp. Thru Fuel Inv.		\$ 483,537		\$ 539,493
Total Test Year Property Taxes to Expense		\$ 54,768,493		\$ 54,824,449
Adjustment to annualized property taxes based upon Dec. 31, 2005 Plant Balances		\$ 1,288,142		\$ 1,480,759
	Adjustment No.	S-87.2		S-87.2

Analysis of Property Taxes

				Total Plant Dec. 31, 2005
<u>Plant-in-Service at Jan. 1, 2006 (Dec. 31, 2005)</u>				
Plant Cost Capitalized (Property Taxes)			\$	40,134,064
Plant Cost Vehicle Property Taxes to Clearings			\$	35,621,521
Plant Cost of Unit Train Property-To Fuel Inv.			\$	42,629,961
Plant Cost of Non-Utility Property Taxes			\$	5,183,086
Plant Cost of Property Taxes to O&M Exp.			\$	5,093,548,781
Total Gross Plant			\$	5,217,117,413
Total property taxes paid as a percent of gross plant in 2005				1.08855%
Total annualized property taxes				\$ 56,791,038
	12-Months Ended Dec. 31, 2005	Percent Distribution		Annualized Levels
<u>Distribution of Property Taxes Charged Per Year</u>				
Capitalized Property Taxes	\$ 145,097	0.263%	\$	149,592
Vehicle Property Taxes charged to Clearing Accts	\$ 483,537	0.878%	\$	498,515
Unit Train Property Taxes Charged to Fuel Inv.	\$ 87,404	0.159%	\$	90,111
Non-Utility Property Taxes	\$ 83,703	0.152%	\$	86,296
Property Taxes Charged to O&M	\$ 54,284,956	98.548%	\$	55,966,524
Total Property Taxes Charged Per Year	\$ 55,084,697	100.000%	\$	56,791,038
 Annualized Property Taxes to Expense				
Property Taxes Charged to O&M			\$	55,966,524
Unit Train - Property Taxes Charged to Exp. Thru Fuel Inv.			\$	90,111
Total Annualized Property Taxes to Expense			\$	56,056,635
 Test Year Property Taxes to Expense				
Property Taxes Charged to O&M =Test Year Expense			\$	54,284,956
Unit Train - Property Taxes Charged to Exp. Thru Fuel Inv.			\$	87,404
Total Test Year Property Taxes to Expense			\$	54,372,360
Adjustment to annualized property taxes based upon Dec. 31, 2005 Plant Balances				\$ 1,684,275
Adjustment No.				S-87.2