Exhibit No.: KCP!L-13

Issue:Wolf Creek Funding LevelsWitness:Gregg N. ClizerType of Exhibit:Direct TestimonySponsoring Party:Kansas City Power & Light CompanyCase No.:ER-2010-____Date Testimony Prepared:June 4, 2010

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2010-

DIRECT TESTIMONY

OF

GREGG N. CLIZER

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

Kansas City, Missouri June 2010

KCPL Exhibit No. KCPL Date 2/4/11 Reporter Lm File No_ ER-2010-0355

DIRECT TESTIMONY

OF

GREGG N. CLIZER

Case No. ER-2010-____

| 1 | Q: | Please state your name and business address. |
|----|----|--|
| 2 | A: | My name is Gregg N. Clizer. My business address is 1200 Main Street, Kansas City, |
| 3 | | Missouri 64105. |
| 4 | Q: | By whom and in what capacity are you employed? |
| 5 | A: | I am employed by Kansas City Power & Light Company ("KCP&L" or the "Company") |
| 6 | | as Senior Manager, Corporate Finance. |
| 7 | Q: | What are your responsibilities? |
| 8 | A: | My responsibilities include the development, analysis, and implementation of financing |
| 9 | | plans and a capital structure that maintain continuous access to capital at the lowest |
| 10 | | overall cost. |
| 11 | Q: | Please describe your education, experience and employment history. |
| 12 | A: | I graduated from the University of Missouri-Columbia in 1981 with a Bachelor of |
| 13 | | Science degree in Industrial Engineering. I received a Master of Business Administration |
| 14 | | degree-from the University of Missouri-Kansas City in 1987. I am a registered |
| 15 | | Professional Engineer in the State of Missouri. I have been employed by KCP&L or its |
| 16 | | affiliates since 1981 in various roles in the areas of Corporate Planning, Corporate |
| 17 | | Modeling, Business Development, Financial Planning and Corporate Budgets as well as |
| 18 | | my current role in Corporate Finance. |
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Q: Have you previously testified in a proceeding at the Missouri Public Service Commission ("MPSC" or "Commission") or before any other utility regulatory agency?

4 A: I have previously provided written testimony to the MPSC. I have also provided
5 testimony to the Kansas Corporation Commission ("KCC").

6 Q: What is the purpose of your testimony?

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- 7 A: The purpose of my testimony is to recommend a funding level for the Missouri
 8 jurisdictional component of KCP&L's trust fund for the decommissioning of the Wolf
 9 Creek Nuclear Generating Station ("Wolf Creek").
- 10 Q: Please summarize your recommendation regarding the appropriate funding level 11 for the Missouri jurisdictional component of KCP&L's trust fund for the 12 decommissioning of Wolf Creek. -
- A: I am recommending that the annual funding level for the Missouri jurisdictional component of KCP&L's trust fund for the decommissioning of Wolf Creek be set at \$1,158,417 as shown in attached Schedule GNC2010-1. This funding level would begin after rates in this case become effective and would continue at the same level through the first quarter of 2045 unless the funding level is changed in a future proceeding before the MPSC. –
- 19 Q: How does your recommended funding level compare to the existing funding level?
- A: The existing annual funding level for the Missouri jurisdictional component of KCP&L's
 decommissioning trust fund is \$1,281,264. The recommended new annual funding level
 of \$1,158,417 is \$122,847 less than the existing funding level. This decrease is reflected

| | 1 | | in adjustment CS-37 on the Summary of Adjustments attached to the direct testimony of |
|--|----|----|---|
| | 2 | | KCP&L witness John P. Weisensee as Schedule JPW2010-2. |
| | 3 | Q: | Please outline the assumptions that were used to arrive at the appropriate accrual |
| | 4 | | level. |
| | 5 | A: | The following factors must be considered in the determination of an appropriate accrual |
| | 6 | | level. |
| | 7 | | Decommissioning Cost Estimate; |
| | 8 | | Decommissioning Cost Escalation Rate; |
| | 9 | | Decommissioning Cost Timing; |
| | 10 | | Remaining Life of the Fund; |
| | 11 | | KCP&L's Ownership Percentage; |
| | 12 | | Missouri Jurisdictional Allocation Factor; |
| | 13 | | Trust Fund Investment Mix; |
| | 14 | | Trust Fund Management Fees; |
| | 15 | | Taxes on Fund Earnings; |
| | 16 | | Earnings on Fund Investments; |
| | 17 | | Current Trust Fund Balance; |
| | 18 | | Accrual Escalation Methodology; and |
| | 19 | | IRS Tax Qualification of the Trust. |

1 Decommissioning Cost Estimate

2 Q: What is the current dollar decommissioning cost estimate for Wolf Creek and what
3 is the basis for that estimate?

A: The current decommissioning cost estimate for Wolf Creek is \$593,542,172 in 2008
dollars. This cost estimate is based on a study dated August 2008 performed by TLG
Services, Inc. ("TLG"). TLG is a recognized industry leader in the area of nuclear
decommissioning cost analysis. The \$593,542,172 cost estimate is based on the
immediate dismantlement and site restoration alternative for decommissioning. The TLG
study was filed with the MPSC on August 29, 2008 in Case No. EO-2009-0072.

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Decommissioning Cost Escalation Rate

11 Q: What is the decommissioning cost escalation rate that you are recommending?

A: I am recommending a cost escalation rate of 3.73% per year to escalate the 2008
decommissioning cost estimate of \$593,542,172 from 2008 dollars to their equivalent
levels in future years during which the decommissioning costs are expected to be
incurred.

16 Q: What index or formula was the basis for your recommended cost escalation rate?

17 There are a number of indices like the Consumer Price Index or the Gross Domestic A: 18 Product Deflator that are often used to measure changes in prices or inflation. 19 Unfortunately, none of these indices specifically relates to inflation in nuclear 20 decommissioning costs. The Nuclear Regulatory Commission ("NRC"), however, has 21 identified three main cost drivers (labor cost, energy cost, and burial cost) in nuclear 22 decommissioning costs and has incorporated these into a formula for escalating nuclear 23 decommissioning costs. The NRC uses its formula to estimate current year

| • | 1 | | decommissioning costs by escalating a 1986 generic reference reactor decommissioning |
|---|----|----|---|
| | 2 | | cost estimate. I used the NRC formula to develop a future nuclear decommissioning cost |
| | 3 | | escalation rate for escalating the 2008 cost estimate. |
| | 4 | Q: | Please describe the NRC formula. |
| | 5 | A: | The NRC Cost Adjustment Formula can be found in NUREG-1307, Revision 13, "Report |
| | 6 | | on Waste Burial Charges – Changes in Decommissioning Waste Disposal Costs at Low- |
| | 7 | | Level Waste Burial Facilities." The NRC Cost Adjustment Formula is: |
| | 8 | | Estimated Cost in Current Year = $[1986 \text{ $ Cost}] * [65\% L_x + 13\% E_x + 22\% B_x]$ |
| | 9 | | where: |
| | 10 | | L_x = Labor Cost Escalation from January 1986 to Current Year |
| | 11 | | E_x = Energy Cost Escalation from January 1986 to Current Year |
| | 12 | | B_x = Burial Cost Escalation from January 1986 to Current Year |
| , | 13 | | In addition, the Energy Cost Escalation (E_x) is a weighted average of two components, |
| | 14 | | namely, Industrial Electric Power (P_x) and Light Fuel Oil (F_x). The formula for E_x is: |
| | 15 | | $E_x = 58\% P_x + 42\% F_x$ |
| | 16 | | I adapted this NRC Cost Adjustment Formula to escalate the 2008 TLG Wolf Creek |
| | 17 | | decommissioning cost estimate to the appropriate future years when the decommissioning |
| | 18 | | costs are expected to be incurred. |
| | 19 | Q: | What was your source for the Labor and Energy escalation factors in the adapted |
| | 20 | | NRC Formula? |
| | 21 | A: | I utilized a long range forecast published by Global Insight titled The U.S. Economy, The |
| | 22 | | 30-Year Focus, Fourth-Quarter 2008, as the source for the cost escalation estimates for |
| | 23 | | the Labor and Energy components of the adapted NRC formula. Global Insight is a well- |
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known and respected source of economic forecasts, and its 30-Year Focus contains projections for numerous indices including the Labor and Energy components of the Global Insight's forecast typically contains four scenarios: Trend, NRC Formula. Cyclical, Optimistic, and Pessimistic. The Trend scenario is the baseline forecast and is the scenario that I utilized as the basis for the inflation estimates. The Global Insight forecast includes projections for future years through 2038. I utilized the 2038 figures as a proxy for the years 2039 through 2049 in order to develop projections through the 8 midpoint of decommissioning.

9 **Q**: How did you estimate the burial cost escalation rate?

10 A: Unfortunately, the Global Insight forecast does not include a projection of burial costs. 11 NUREG-1307, Revision 13, however, contains some historical indices for burial costs at 12 the low-level waste storage sites located in the states of Washington and South Carolina. 13 While neither of the storage sites has accepted low-level waste from Wolf Creek since 14 2008, the increase in the historical burial cost indices for these sites can serve as 15 reasonable proxies for future burial cost escalation at other sites.

16 Q: Please describe the results of your analysis for the NRC Formula.

17 A: For the Labor and Energy components I calculated the geometric mean of the Global 18 Insight projections for 2009 through 2049 and used these geometric means in the NRG 19 formula. For the Burial component I calculated the geometric means for 1998 through 20 2008 (PWR/Compact/Direct Disposal) for the Washington and South Carolina sites, 21 respectively, and averaged the geometric means for the two sites. The results for the 22 various components of the NRC formula are:



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|) | 1 | | Labor (L _x) | | 3.0% | | | | |
|---|----------------------|---|--|--|--|--|--|--|--|
| | 2 | | Energy (E _x) | Electricity (P _x) | 1.7% | | | | |
| | 3 | | | Fuel Oil (F _x) | 0.5% | | | | |
| | 4 | | Burial (B _x) | | 7.4% | | | | |
| | 5 | The resulting nuclear decommissioning cost escalation estimate calculated by plugging | | | | | | | |
| | 6 | the figures above into the NRC formula is 3.73%. The calculation is shown below: | | | | | | | |
| | 7 | NRC Rate = $65\% L_x + 13\% E_x + 22\% B_x$ | | | | | | | |
| | 8 | NRC Rate = $65\% L_x + 13\% * (58\% P_x + 42\% F_x) + 22\% B_x$ | | | | | | | |
| | 9 | | NRC Rate = $[65\%*3.0\%] + [13\%*((58\%*1.7\%)+(42\%*0.5\%))] + [22\%*7.4\%]$ | | | | | | |
| | 10 | NRC Rate = 3.73% | | | | | | | |
| | 11 | Decommissioning Cost Timing | | | | | | | |
| | 12 | Q: | What is the assume | d timing of the future | e decommissioning costs? | | | | |
| | 13 | A: | Wolf Creek's oper | ating license expires | in 2045 and the 2008 TLG Wolf Creek | | | | |
| | 14 | | decommissioning study showed a schedule of decommissioning costs beginning in 2045 | | | | | | |
| | 15 | | and continuing throu | gh 2053. | | | | | |
| | 16 | <u>Rema</u> | ining Life of the Fun | | | | | | |
| | | | What is the remaining life of the trust fund? | | | | | | |
| | 17 | Q: | What is the remain | ing life of the trust fu | nd? | | | | |
| | 17 18 | Q: A: | What is the remain Accruals for the trus | ing life of the trust fu st fund will continue ι | nd? | | | | |
| | 17 18 19 | Q: A: | What is the remain Accruals for the trus 2045. The remain | ing life of the trust fu st fund will continue u ing investments in th | nd? Intil Wolf Creek's operating license expires in the fund, however, will continue to generate | | | | |
| | 17 18 19 20 | Q: A: | What is the remain Accruals for the trus 2045. The remain earnings throughout | ing life of the trust fur st fund will continue ur ing investments in the the decommissioning | nd? Intil Wolf Creek's operating license expires in the fund, however, will continue to generate process until 2053 when decommissioning is | | | | |

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1 KCP&L's Ownership Percentage

- 2 Q: What is KCP&L's ownership percentage in Wolf Creek?
- 3 A: KCP&L owns 47% of Wolf Creek.
- 4 Missouri Jurisdictional Allocation Factor
- 5 Q: What Missouri jurisdictional allocation factor did you use in the determination of
 6 the accrual level?
- 7 A: I used a Missouri jurisdictional allocation factor of 55.87% in the accrual calculation.

8 Q: What is the basis for the Missouri jurisdictional allocation factor?

- 9 A: Because of the unique nature of the decommissioning funding, the appropriate
 10 jurisdictional allocation factor is the weighted average of the jurisdictional demand
 11 allocation factors applicable to the jurisdiction in question throughout the entire life of
 12 Wolf Creek, both historical and future. The weather-normalized jurisdictional demand
 13 allocation factor used elsewhere in this case was used as a proxy for future jurisdictional
 14 demand allocation factors.
- 15 Trust Fund Investment Mix
- 16 Q: What trust fund investment mix did you use in the determination of the accrual 17 level?
- A: I used an assumed investment mix of 65% equity and 35% fixed income. The 65%
 equity allocation is made up of 41% U.S. large company stocks, 9% U.S. small company
 stocks, and 15% international equities. This mix is consistent with the investment
 guidelines agreed to by KCP&L and the fund managers and approved by the Commission
 in Case No. EO-2009-0439. These investment guidelines, in the view of KCP&L,
 provide for a portfolio that maintains an appropriate balance between minimizing risk and

maximizing return. I have assumed that this investment mix will be in place beginning in 2010 and will remain in place until 2025. After 2025, I have gradually shifted the investment mix described above to reduce the equity allocation and increase the allocation to fixed income securities and U.S. Treasury bills ("T-bills") such that, by the start of decommissioning in 2045, the portfolio is assumed to consist of 50% fixed income and 50% T-bills. During the period of decommissioning from 2045 to 2053, I have gradually shifted the investment mix to consist of 100% T-bills. These assumed shifts in the investment mix were intended to provide for a portfolio that minimizes the risk of loss and improves the liquidity of the fund as the need for the decommissioning funds becomes imminent.

11 Q: Do KCP&L and the fund managers periodically monitor and review the 12 appropriateness of the investment guidelines?

A: Yes, and these reviews will continue to occur as time goes on and circumstances change.
For instance, in the past the investment guidelines were altered in order to facilitate the
fund's move out of municipal bonds when a change in the tax rate on the fund earnings
reduced the relative attractiveness of municipal bonds. Recent changes in the investment
guidelines were made based on the license extension that was approved for Wolf Creek in
2008.

19 Trust Fund Management Fees

20 Q: What are the estimated trust fund management fees?

A: The trust fund management fees consist of a minimum fixed trustee fee of \$35,000 per
year plus a variable fee of 21 basis points (0.21%) based on the market value of the fixed

| 1 | | income investments and a variable fee of no more than 10 basis points (0.10%) based on | | | | | | | |
|----|-------------|--|----------------|---------------------------|--|--|--|--|--|
| 2 | | the market value of the equity investments. | | | | | | | |
| 3 | <u>Taxe</u> | s on Fund Earnings | | | | | | | |
| 4 | Q: | What are the assumed taxes on the fund earnings? | | | | | | | |
| 5 | A: | The treasuries, government bonds, corporate bonds, and corporate equities in the trust | | | | | | | |
| 6 | | fund are subject to Federal tax at a rate of 20% and are not subject to state tax. Any | | | | | | | |
| 7 | | municipal bonds in the trust would be subject to neither Federal nor state taxes. | | | | | | | |
| 8 | <u>Earn</u> | tings on Fund Investments | | | | | | | |
| 9 | Q: | What trust earnings rate did you assume in the determination of the accrual level? | | | | | | | |
| 10 | A: | I calculated an assumed trust fund earnings rate at the initial investment mix described | | | | | | | |
| 11 | | above to be 6.95% after the taxes and fees also described above. The components of this | | | | | | | |
| 12 | | calculation are shown below. | | | | | | | |
| 13 | | | Investment Mix | Return After Fees & Taxes | | | | | |
| 14 | | Large Corporate Equities | 41% | 8.31% | | | | | |
| 15 | | Small Corporate Equities | 9% | 12.07% | | | | | |
| 16 | | International Equities | 15% | 9.11% | | | | | |
| 17 | | Fixed Income Investments | 35% | 3.11% | | | | | |
| 18 | | US Treasury Bills | 0% | <u>1.91%</u> | | | | | |
| 19 | | Total | <u>100%</u> | <u>6.95%</u> | | | | | |
| 20 | Q: | What was the source for your trust fund earnings rate assumptions? | | | | | | | |
| 21 | A: | I utilized the historical total return data published by Ibbotson Associates titled Ibbotson | | | | | | | |
| 22 | | SBBI 2009 Classic Yearbook Market Results for Stocks, Bonds, Bills, and Inflation 1926- | | | | | | | |
| 23 | | 2008 (the "Ibbotson 2009 Yearbook"), as the source for my analysis of the expected | | | | | | | |
| | | | | | | | | | |

1 return for the various investment instruments in the portfolio. Ibbotson Associates is a 2 well-known and respected source for historical investment return data. The Ibbotson 3 2009 Yearbook contains return data for the years 1926 to 2008. I used the methodology described in Chapter 10 of the Ibbotson 2009 Yearbook to calculate expected returns for 4 5 the investments in the trust fund. I started with a riskless rate of 4.0% based on the 30 6 year U.S. Treasury coupon rate as of September 30, 2009. I calculated the expected fixed 7 income return of 4.1% by adding a 0.1% expected default premium based on the mean 8 difference between historical long-term corporate bonds and long-term government bond 9 total returns to the riskless rate of 4.0%. I calculated the expected large corporate equity 10 return of 10.5% by adding a 6.5% equity premium based on the mean difference between 11 large company stock total returns and long-term government bond income returns to the 12 riskless rate of 4.0%. I calculated the expected small corporate equity return of 15.2% by 13 adding a 4.7% small stock premium based on the mean difference between small 14 company stock total returns and large company stock total returns to the expected large 15 corporate equity return of 10.5%. I calculated the expected international equity return of 16 11.5% by adding a 1.0% international stock premium based on the mean difference 17 between international company stock total returns and large company stock total returns 18 to the expected large corporate equity return of 10.5%. I calculated the expected T-bill 19 return of 2.6% by subtracting an expected long-term horizon premium of 1.4% (based on 20 the mean difference between long-term government bond income returns and T-bill total 21 returns) from the riskless rate of 4.0%. All of the expected returns were then reduced by 22 the management fees and income taxes to determine the expected net earnings used to 23 determine the accrual level.

1 <u>Current Trust Fund Balance</u>

| 2 | Q: | What was the Missouri jurisdictional trust fund balance as of December 31, 2009? | | | | | | |
|----|-------------|---|--|--|--|--|--|--|
| 3 | A: | The market value of the Missouri jurisdictional portion of KCP&L's decommissioning | | | | | | |
| 4 | | trust fund at December 31, 2009 was \$73,065,920 (including \$6,809,694 of net | | | | | | |
| 5 | | unrealized gains). The balance is \$73,386,236, including KCP&L's January 2010 deposit | | | | | | |
| 6 | | for the fourth-quarter 2009 accruals. Assuming an effective tax rate of 20% on | | | | | | |
| 7 | | unrealized net gains, the net after-tax market value of the Missouri jurisdictional portion | | | | | | |
| 8 | | of the trust was \$72,024,297 at December 31, 2009. | | | | | | |
| 9 | <u>Accr</u> | al Escalation Methodology | | | | | | |
| 10 | Q: | What accrual escalation methodology was used in the determination of the accrual | | | | | | |
| 11 | | level? | | | | | | |
| 12 | A: | A level annual amount of funding was assumed. | | | | | | |
| 13 | Q: | Was this level funding assumption utilized in the determination of the accrual | | | | | | |
| 14 | | schedule previously approved by the MPSC for KCP&L's Missouri jurisdictional | | | | | | |
| 15 | | funding? | | | | | | |
| 16 | A: | Yes, KCP&L has previously utilized a level funding assumption in determining the | | | | | | |
| 17 | | annual accrual amount authorized by the MPSC. | | | | | | |
| 18 | Q: | Is the level funding that you are recommending consistent with the funding | | | | | | |
| 19 | | methodologies utilized by KCP&L in its Kansas jurisdiction? | | | | | | |
| 20 | A: | Yes, a level funding assumption was utilized in the determination of the accrual | | | | | | |
| 21 | | schedules approved by the KCC in Docket No. 06-KCPE-828-RTS and proposed in KCC | | | | | | |
| 22 | | Docket 10-KCPE-415-RTS. | | | | | | |

1 IRS Tax Qualification of the Trust

Q: What is meant by the term "tax qualification" as it relates to nuclear
decommissioning trust funds?

A: 4 A "tax-qualified" nuclear decommissioning trust fund is a fund that meets certain criteria 5 as defined in Section 468A of the Internal Revenue Code ("Section 468A"). Tax-6 qualified nuclear decommissioning trust funds are afforded favorable tax treatment as 7 compared to non-qualified funds. There are two main tax advantages provided by a tax-8 qualified fund. The first is that contributions made to the trust fund can be treated as 9 current-year tax deductions. The second is that earnings on the investments in the trust 10 fund are taxed at an applicable federal tax rate of 20% as compared to a 35% federal tax 11 rate on earnings in a non-qualified fund.

- 12 Q: Did the Energy Policy Act of 2005 ("2005 EPAct") include any modifications to the
 13 special rules for nuclear decommissioning and Section 468A?
- 14 A: Yes, the 2005 EPAct included a number of modifications to the special rules for nuclear
 15 decommissioning. Among the modifications were amendments to Section 468A which
 16 govern the tax qualification of nuclear decommissioning trust funds. These amendments
 17 are effective for taxable years beginning after December 31, 2005.

18 Q: What were the requirements for tax qualification under Section 468A prior to the
19 changes resulting from the 2005 EPAct?

A: Prior to the 2005 EPAct, in order to ensure the continued tax qualification of the fund,
 any change in the funding levels had to be filed with and approved by the Internal
 Revenue Service ("IRS"). The IRS required a statement in an order of the state
 commission (a) approving the schedule of decommissioning cost accruals; (b) finding

that the decommissioning cost accruals were included in cost of service and were included in rates for ratemaking purposes; and (c) finding that the earnings rate assumed for the trust took into consideration the tax rate change and the removal of the investment restrictions resulting from the Energy Policy Act of 1992.

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5 Q: How have the requirements for tax qualification changed as a result of the changes 6 to Section 468A?

A: There is no longer a cost of service requirement for tax-qualified funds. Previously,
deposits into a tax-qualified fund were limited by the amount included in cost of service
for ratemaking purposes (so long as that amount was not higher than what the level
funding amount would have been). Regarding the allowed level of funding into a taxqualified fund, the revised Section 468A states only that "the amount which a taxpayer
may pay into the Fund for any taxable year shall not exceed the ruling amount applicable
to such taxable year."

14 Q: What was the rationale for the elimination of the cost of service requirement?

A: The cost of service requirement was primarily eliminated to allow nuclear owners in
states that now have deregulated generation to maintain the tax-qualified status of their
trust funds in the absence of cost of service-based regulation.

Q: Given the elimination of the cost of service requirement for tax-qualification of the
fund, what language would you request that the MPSC put in its Order regarding
the amount of decommissioning funding in cost of service for ratemaking purposes?
A: KCP&L respectfully requests that the MPSC use the same language in the order
approving the decommissioning funding level that was required prior to the changes to
Section 468A. Because of the uncertainty at this time regarding potential IRS treatment,

1 use of the prior Section 468A language provides the greatest assurance of continued tax-2 qualified decommissioning funding. 3 What factors previously discussed had a significant impact on the change in the Q: 4 recommended annual funding level? As discussed earlier in my testimony, the recommended annual funding level is 5 A: 6 approximately \$0.1 million lower than the existing funding level. The key drivers of the 7 reduction were (i) \$1.9 million from a change in asset allocation to 65% equity / 35% 8 debt; and (ii) \$1.8 million from a decrease in the cost escalation rate from 4.40% to 9 3.73%. These were partly offset by (i) \$2.4 million of increased contribution due to 10 lower assumed returns on fund assets; and (ii) \$1.1 million of increased contribution from 11 a lower current fund balance than previously projected.

12 Q: Does this conclude your testimony?

13 A: Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas City) Power & Light Company to Modify Its Tariffs to) Continue the Implementation of Its Regulatory Plan)

Docket No. ER-2010-____

AFFIDAVIT OF GREGG N. CLIZER

STATE OF MISSOURI)) ss COUNTY OF JACKSON)

Gregg N. Clizer, being first duly sworn on his oath, states:

1. My name is Gregg N. Clizer. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Senior Manager, Corporate Finance.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Kansas City Power & Light Company consisting of $\frac{fifteen}{15}$

pages, having been prepared in written form for introduction into evidence in the abovecaptioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Grey of Cyin

Gregg N. Clizer

Subscribed and sworn before me this $\underline{\sim 3}$ day of May, 2010.

Micol A. Le Notary Public My commission expires: Fub. 4,2011 "NOTARY SEAL Nicole A. Wehry, Notary Public Jackson County, State of Missouri My Commission Expires 2/4/2011 Commission Number 07391200



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| | | 73,386,236 1,361,939 72,024,287 | | Trust Fund Balance | 72.024.287 72.024.287 85.065.855 85.065.855 110.802.313 110.802.313 110.802.313 110.802.313 110.802.313 110.802.313 110.802.313 110.802.315 110.802.457 1165.762 2365.268 2565.258 2565 | |
|------------------------------------|---------------------|---|-----------------------|---|---|--|
| | D CASH FLOWS | RKET VALUE 73.065.970 320.316 6.809.634 20.00% | %00'0 | Earnings After Faas & Taxes | 5,037,341 5,037,341 5,473,352 5,473,352 5,473,353 5,473,353 5,473,353 1,757,567 8,457,277 9,457,277 9,457,277 11,252,548 11,552,548 11,552,558 11,552,558 11,552,558 11,552,558 11,552,558 11,552,558 11,552,558 11,552,558 11,552,558 11,552,558 11,552,558 11,552,558 11,552,558 11,552,558 11,552,558 | |
| | SSIGNING TRUST FUNI | NET AFTER-TAX MA Get Value Tual Accrual Gain Net Gain Cet Value | | Trust Fund Expenditure | C C C C C C C C C C C C C C C C C C C | |
| | DECOMMI | December-03 Mar 2010 Q4 Acc Market Value Incl Unrealized Hat Tax on Unrealized Net After-1ax Mar | al Accrual Escalation | Trust Fund Accrual | 1,185,185,1 1,185,185,1 1,185,184,10 1,185,184,100,184,100,184,100,184,100,184,100,184, | |
| s ST | | | Ann | Year | 2011 2011 2011 2011 2011 2011 2011 2011 | |
| COMPAN T ANALYSIS XABLE TRUS | Π | | | Veighted Affer-Tax Earnings | 6.0000 6.0000 6.0000 6.0000 6.0000 6.0000 6.0000 6.0000 6.0000 6.0000 6.0000 6.0000 6.0000 6.00000 6.00000 6.00000 6.00000000 | 100% 100% 100% |
| & LIGHT NING TRUS | ONS | | Lrg Corp Stocks | 10.5% 20.0% 8.31% | 41.0% 41.0% 41.0% 41.0% 41.0% 41.0% 41.0% 41.0% 41.0% 41.0% 81.8% 81.8% 81.0% | 41.0% 2.05% 0.00% 0.00% |
| DWER (MMISSIO | ASSUMPT | | Stocks | 15.2% 20.0% 12.07% | 90% 90% 90% 90% 90% 90% 90% 90% 90% 90% | 9.0% 0.45% 0.00% 0.00% |
| CITY P(EK DECO IRISDICTI | EARNINGS | Katata | Inter- national | 11.5% 20.0% 9.11% vestment 1 | 15.0% | 15.0% 0.75% 0.00% 0.00% |
| NSAS (NEAS (SOURL JU | IST FUND I | 85,831,709 18,684 0.019 0.119 | Fixed Income | 4.1% 20.0% 3.10% | 35.0% | 35.0% -0.75% 5.25% 6.25% 0.00% |
| KA | AMISSIONING TRU | MANAGEMENT FE Ind Bat Xed Fee Xe d Fee ixed Fee | T-Bilfs | енить 2.6% х Rale 20.0% . Тахев <u>1.90%</u> | 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% | 2025 0.0% -2.50% 2045 50.00% -8.25% 2053 100.00% |
| | DECOL | TRUST FOND Missouri Avg F Missouri Avg F Missouri Ani Fi Fise Sand Fise Equity Fee and Fise | | Pre-tax F Effective Ta Earnings After Fees & <u>Year</u> | 2009 2011 2011 2011 2011 2011 2011 2011 | |
| | | 27.572 3.73% 77.00% 55.35% 55.87% | | Lost L | 1 1337 1 1337 1 1397 1 1397 | |
| | MPTIONS | \$ 283'E | | KCP Misso Decorri | 52,58 142,434 112,153 | |
| | IG COST ASSU | at Est Rate on Factor filoc Factor | | Escalated Wolf Greek Decom Cost | 200,236,334 481,992,394 581,193,226 331,305,863,947 331,305,863,947 331,305,8237 331,305,827 332,305,827 332,305,305,305,305,305,305,305,305,305,305 | |
| | DECOMMISSIONIN | 2008 Decom Cor Cost Escalation KCPL Share thre Juris Allocati Historical/Future J | | 2008 Wolf Creek Decom Cost | 51,651,255 11,128,51,255 130,085,262 130,085,262 130,085,262 130,085,262 130,171,138 231,171,138 231,171,138 | |
| | | MMG | | Year | 2019 2010 2011 2011 2011 2011 2011 2011 | |

10:30 MM Schedule GNC2010-1