KCP&L-245

Exhibit No.:

Issues: RESRAM

Proposition C

Witness:

Michael E. Taylor

Sponsoring Party:

MO PSC Staff

Type of Exhibit:

Surrebuttal Testimony

Case No.:

ER-2010-0355

Date Testimony Prepared:

January 5, 2011

MISSOURI PUBLIC SERVICE COMMISSION UTILITY OPERATIONS DIVISION

SURREBUTTAL TESTIMONY

OF

MICHAEL E. TAYLOR

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2010-0355

Jefferson City, Missouri January 2011

Staff Exhibit No KCPAL-245

Date 1/18/11 Reporter LmB

File No E12-2010-0355

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas City Power & Light Company for Approval to Make Certain Changes in its Charges for Electric Service to Continue the Implementation of Its Regulatory Plan)) File No.: ER-2010-0355)
AFFIDAVIT OF M	ICHAEL E. TAYLOR
STATE OF MISSOURI)) ss COUNTY OF COLE)	
preparation of the following Surrebuttal consisting of 2 pages of Surrebuttal that the answers in the following Surrebut	h his oath states: that he has participated in the I Testimony in question and answer form, Testimony to be presented in the above case, tal Testimony were given by him; that he has answers; and that such matters are true to the
	Mulai E. Taylor

SUSAN L. SUNDERMEYER

Notary Public - Notary Seal
State of Missouri
Commission Expires: October 03, 2014
My Commission Expires: 0ctober 03, 2014

Subscribed and sworn to before me this 4th day of January, 2011.

Notary Public

1		SURREBUTTAL TESTIMONY	
2		OF	
5		MICHAEL E. TAYLOR	
6		KANSAS CITY POWER & LIGHT COMPANY	
8		CASE NO. ER-2010-0355	
10			
12	Q.	Please state your name and business address.	
13	Α.	Michael E. Taylor, P.O. Box 360, Jefferson City, Missouri, 65102.	
14	Q.	By whom are you employed and in what capacity?	
15	A.	I am employed by the Missouri Public Service Commission (Commission) as a	
16	Utility Engineering Specialist III in the Energy Department of the Utility Operations Division.		
17	Q.	Are you the same Michael E. Taylor who has previously filed Rebuttal	
18	Testimony in	this case?	
19	Α.	Yes, I am.	
20	Q.	What is the purpose of your Surrebuttal Testimony?	
21	Α.	I am responding to the Rebuttal Testimony of Kansas City Power & Light	
22	Company (K	(CPL) witness Tim M. Rush regarding an expense associated with meeting a	
23	"portfolio requirement" of the "renewable energy resources" requirement found in Section		
24	393.1030, R	SMo (Cum. Supp. 2009).	
25	Q.	What Renewable Energy Standard- (RES-) related expense did Mr. Rush	
26	address in hi	s Rebuttal Testimony?	
27	Α.	On page 4, lines 4 through 6, Mr. Rush states that KCPL has entered into a	
28	solar energy purchased power agreement that qualifies as a renewable energy resource.		
29	Ο.	Does KCPL have any solar energy purchased power contracts?	

Surrebuttal Testimony of Michael E. Taylor

A. No. KCPL responded to Staff Data Request No. 0542 on December 13, 2010
stating that it did not have a solar energy purchased power contract. Staff submitted follow
up Data Request No. 0582 to KCPL on December 21, 2010, seeking to reconcile Mr. Rush's
Rebuttal Testimony and the Company's response to Data Request No. 0542. The response to
Data Request No. 0582 confirmed that KCPL does not have any solar energy purchased
power contracts.

- Q. On page 4, lines 6 and 7, of his Rebuttal Testimony Mr. Rush also states that Staff recognized the solar energy purchased power agreement in its fuel run in this case. Do you agree with that statement?
- A. No. KCPL responded to Staff Data Request No. 0229 on September 9, 2010, stating that it did not have a solar energy purchased power contract. Therefore, Staff did not utilize a solar energy purchased power agreement in its fuel run in this case.
 - Q. Does this conclude your Surrebuttal Testimony?
 - A. Yes.