

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of a Proposed Experimental)
Regulatory Plan of) Case No. EO-2005-0329
Kansas City Power and Light Company)

**SIERRA CLUB AND CONCERNED CITIZENS OF PLATTE COUNTY'S FIRST
SUPPLEMENTAL RESPONSES TO KANSAS CITY POWER AND LIGHT'S
FIRST DATA REQUEST TO SIERRA CLUB AND
CONCERNED CITIZENS OF PLATTE COUNTY**

1. Please identify the name, address, and employer of all expert witnesses that the Sierra Club (SC) and/or Concerned Citizens of Platte County (CCPC) intends to sponsor at the evidentiary hearings in this case.

ANSWER:

SC and CCPC will present the following expert witnesses:

Name: Ned Ford
Address: 3420 Stettinius Avenue
Cincinnati, Ohio 45208
Employer: Self-employed

Name: Troy Helming
Address: 8448 Summit Street
Lenexa, KS 66215
CEO of Krystal Planet Corporation

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**Missouri Public
Service Commission**

2. Please provide a resume, vitae or summary of the educational and professional background of each expert witness that the Sierra Club and/or Concerned Citizens of Platte County intends to sponsor at the evidentiary hearings in this case.

ANSWER:

A. Ned Ford
Curriculum vita is attached.

B. Troy Helming

Mr. Helming is known as one of America's leading clean energy economists, showing how converting to clean power can be profitable: "there is green in going green." He's the creator of The Freedom Plan (convert America to 100% wind &

Exhibit No. 10
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hydrogen and save the U.S. economy \$20 Trillion by 2025), author of "The Clean Power Revolution" and numerous wind energy publications, founder & CEO of Krystal Planet (uses Grass Roots marketing to implement The Freedom Plan). Mr. Helming has been a keynote speaker on wind energy since 2000, addressing energy executives & the public in over a dozen states and 4 countries. Mr. Helming been featured on the Air America (EcoTalk), The Discovery Channel, PBS, Fox News, Sky Radio (in-flight radio for American, United, Northwest, Delta), NPR & numerous radio stations. His articles have been published in Bank News Magazine, KC Small Business Monthly, The Progressive Investor, Renewable Energy Access, Forbes magazine (KC edition) & dozens of newspapers.

Prior to Krystal Planet, Mr. Helming was CEO of a wind development company where he led efforts to acquire contracts for \$300 Million of wind projects and raised millions in private equity capital. Mr. Helming's 1st two companies in the early to mid-1990s, TeleTeam Consulting Inc. (one of the largest dealers of Nextel Wireless & Lucent Technologies equipment in KC, a multi-million dollar company with 35 employees) and Team Reach Inc (built a worldwide sales team of 16,000 in 2 years), were both quite successful and established Mr. Helming as a proven entrepreneurial leader. He holds a BS in Business Administration from the University of Kansas and is a member of Mensa. Born in 1967, Mr. Helming is a former gymnast, is training to be a pilot and aspires to climb the 'Seven Summits' - the world's tallest mountains per continent - during his lifetime.

3. Please provide a summary of the opinions that each expert witness will present at the evidentiary hearings on this case, and provide all workpapers, supporting documentation and other information that forms the basis for his opinions.

A. Summary of Ned Ford's opinions:

1. KCPL's plan to respond to projected need for new capacity is not the lowest cost plan.
2. KCPL's plan to respond to projected need for new capacity is not the least economically risky plan.
3. KCPL's plan to respond to projected need for new capacity will result in substantially more pollution than other plans that would cost the consumer less.
4. KCPL's projected need is not accurate.

B. Summary of Troy Helming's opinions:

1. KCPL's plan to build a new coal-fired power plant will cost consumers more than it would if KCPL were to build wind plants.
2. Pollution from the United States' addiction to fossil fuels is ruining our health and our environment. Dependence on

foreign sources of energy continues to rise as those sources show signs of running out causing energy prices to soar. Renewable energy sources are a viable solution to these problems

- C. Provide all workpapers and supporting documentation and other information that form the basis for Ned Ford's opinions.

The workpapers and supporting documentation that form the basis for Ned Ford's opinions are attached as email attachments: 1) Abstractbook.pdf; 2) Laitner EnEcon Hanson Laitner July 2004.pdf; 3) Laitner Emerging Tech October 2004.pdf; 4) Four Years Vermont.doc; 5) Rosenfeld-ppt june04.ppt; and 6) Wilson-Vectren-DSM-Test.pdf.

- D. Provide all workpapers and supporting documentation and other information that form the basis for Troy Helming's opinions.

1. Much information is available at the Krystal Planet's website: www.krystal-planet.com, including information about his book which is available for purchase and which can be provided KCPL if desired. The book is entitled "The Clean Power Revolution" and is written by Troy Helming.

2. Attached is an excel spreadsheet that Mr. Helming created to demonstrate cost comparisons.

4. Provide a copy of all testimony previously filed or sponsored by each expert witness before any court, administrative agency, public service commission, state department of natural resources, Environmental Protection Agency or similar tribunal in other cases.

A. Ned Ford's testimony before the Ohio Senate Energy Committee and delivered on May 5, 2005, is attached as an email attachment. Ned Ford testified before the Ohio Public Utility Commission in 1994 and will locate that case number and transcript of that testimony.

B. Troy Helming testified before the Missouri Public Service Commission on May 24, 2005 in Kansas City.