

DATA INFORMATION REQUEST  
KANSAS CITY POWER AND LIGHT  
CASE NO ER-2007-0291

DOE/NNSA  
Ex. 807

FILED  
October 31, 2007  
Data Center  
Missouri Public  
Service Commission

MOPSC STAFF RESPONSE TO DOE/NNSA DATA REQUEST NO. 68

DATE REQUESTED: September 24, 2007

Due Date: October 04, 2007.

USDOE/NNSA would appreciate an earlier response if possible.

DOE/NNSA  
Exhibit No. 807  
Case No(s) ER-2007-0291  
Date 10/10/07 Rptr AF

**INFORMATION REQUESTED:**

Data Request regarding Staff Witness Watkin's Surrebuttal Testimony.

1. Please refer to the Surrebuttal Testimony of Mr. James C. Watkins specifically to page 5 beginning at line 15. Mr. Watkins states that "there are three possible reasons why the results would differ" and he offers the following three "possible" reasons:

1. One possible reason is that there might be an error in the CCOS model software used by DOE-NNSA.
2. A second reason might be that KCPL's budgeted data used in the DOE-NNSA CCOS study varies significantly from the actual weather normalized data actually used in this case to determine KCPL's over all cost of service (Revenue Requirement).
3. A third reason, and perhaps the most likely, is the instability of the allocation methods used in the DOE-NNSA CCOS study.

Regarding the first reason, please provide any and all references to areas of DOE-NNSA's CCOS by page number and line number and reference inputs, allocators, allocations, calculations that Mr. Watkins believes to be in error. In each instance, Mr. Watkins should explain why he believes there to be an error.

Regarding the second reason, please provide any and all analyses performed for or by Mr. Watkins that show or indicate in any fashion that the referenced KCPL budgeted data varies significantly from the actual weather normalized data actually used to determine KCPL's Revenue Requirement.

Regarding the third reason, please provide any and all analyses performed for or by Mr. Watkins that show or indicate in any fashion the instability of the allocation methods used by DOE-NNSA.

RESPONSE: Mr. Watkins' testimony does not claim that the results of DOE-NNSA's studies are so erratic because of each and every reason listed above. Rather, he suggested three possible reasons that he could think of that could explain the disparity between the results of those studies. Mr. Watkins has not performed the in-depth analysis required to answer the detailed questions posed in this data request. He does not know if there are any specific errors in inputs, allocators, allocations, or calculations in DOE-NNSA's CCOS; he did not perform any analyses that show or indicate whether "the referenced KCPL budgeted data varies significantly from the actual weather normalized data actually used to determine KCPL's Revenue Requirement"; and he did not perform any detailed analyses designed to determine "in any fashion" the stability or instability of the allocation methods used by DOE-NNSA.

Answered by: James Watkins

Date: September 25, 2007