

FILED³

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**Missouri Public
Service Commission**

Exhibit No.:

Issue: Financing

Witness: Michael W. Cline

Type of Exhibit: True-Up Rebuttal Testimony

Sponsoring Party: Kansas City Power & Light Company

Case No.: ER-2007-0291

Date Testimony Prepared: November 6, 2007

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2007-0291

TRUE-UP REBUTTAL TESTIMONY

OF

MICHAEL W. CLINE

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

**Kansas City, Missouri
November 2007**

**** [REDACTED] ** Designates "Highly Confidential" Information
Has Been Removed
Pursuant to 4 CSR 240-2.135.**

CO. Exhibit No. 37
Case No(s). ER-2007-0291
Date 1-9-07 Rptr RF

TRUE-UP REBUTTAL TESTIMONY

OF

MICHAEL W. CLINE

Case No. ER-2007-0291

1 **Q: Are you the same Michael Cline who submitted Direct, Rebuttal, and True-Up**
2 **Direct Testimony in this proceeding?**

3 **A: Yes, I am.**

4 **Q: What is the purpose of your True-Up Rebuttal Testimony?**

5 **A: The purpose of my testimony is to correct a mis-impression of Missouri Public Service**
6 **Commission ("Commission") Staff witness Steve M. Traxler in his True-Up Direct**
7 **Testimony with respect to (a) the financing plans of Kansas City Power & Light**
8 **Company ("KCPL") when it initially filed this rate case on February 1, 2007; and (b) the**
9 **lack of any relevance between Great Plains Energy's inability to complete a hybrid debt**
10 **offering prior to September 30, 2007, and the Additional Amortizations now being**
11 **requested in this case.**

12 **Q: Does Mr. Traxler's testimony accurately describe KCPL's financing plans at the**
13 **time it filed this case?**

14 **A: No, it does not. On page 7, lines 3-5, of his True-Up Direct Testimony, Mr. Traxler**
15 **suggests that when KCPL filed the current rate case, it intended to issue ****
16 **in hybrid debt by September 30, 2007. As I described on page 2, lines 18-20 of**
17 **my True-Up Direct Testimony, when KCPL filed this case, the Company's capital**

1 structure's "projected long-term debt component as of September 30, 2007 reflected an
2 issuance of **[REDACTED]** of new long-term debt by KCPL in September 2007." The
3 Company used this capital structure to calculate its initial request for the amount of
4 Additional Amortizations required.

5 **Q: Did the **[REDACTED]** issuance occur?**

6 A: No. Subsequent to filing its case, the Company determined that a hybrid debt issuance by
7 Great Plains Energy, with the proceeds contributed to KCPL as capital, would be
8 preferable. As I previously stated in my Rebuttal Testimony at pages 4-5, the Company
9 also decided to increase the amount of its projected issuance from **[REDACTED]** to
10 **[REDACTED]**. The Company did not, however, complete that offering prior to
11 September 30, 2007, and has not completed it since that time.

12 **Q: What is Mr. Traxler's position with respect to the impact of the hybrid offering not
13 being completed in terms of the impact on the amount of Additional Amortizations
14 in this case?**

15 A: At page 7, line 6 of his testimony, Mr. Traxler characterizes the fact that the hybrid was
16 not issued as having a "significant impact" on the FFO / Debt ratio that is a key metric for
17 determining Additional Amortizations. He then goes on, at page 7, lines 11-13, to
18 attribute the "significant increase" in Additional Amortizations to the fact that KCPL
19 used short-term debt rather than hybrid debt for funding purposes as of the true-up date.

20 **Q: What is your reaction to Mr. Traxler's characterization?**

21 A: Mr. Traxler's assertion is incorrect. As described above, KCPL's Additional
22 Amortizations request in the initial filing in this case did not assume the issuance of
23 hybrid debt. No hybrid debt was issued by the Company prior to the true-up date of

1 September 30, 2007. As such, the structure and features of hybrid debt did not affect and
2 have no relevance to the current request for Additional Amortizations contained in my
3 True-Up Direct Testimony.

4 **Q: Does that conclude your testimony?**

5 **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 Tariff to) Case No. ER-2007-0291
Continue the Implementation of Its Regulatory Plan)

AFFIDAVIT OF MICHAEL W. CLINE

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Michael W. Cline, being first duly sworn on his oath, states:

1. My name is Michael W. Cline. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Treasurer.
2. Attached hereto and made a part hereof for all purposes is my True-Up Rebuttal Testimony on behalf of Kansas City Power & Light Company consisting of three (3) pages, having been prepared in written form for introduction into evidence in the above-captioned 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.

Michael W. Cline
Michael W. Cline

Subscribed and sworn before me this 6th day of November 2007.

Nicole A. Wehry
Notary Public

My commission expires: Feb. 4 2011

