

Exhibit No.:
Issues: Energy Jurisdictional Allocation
Witness: Erin L. Maloney
Sponsoring Party: MO PSC Staff
Type of Exhibit: True-Up Direct Testimony
Case No.: ER-2006-0314
Date Testimony Prepared: November 7, 2006

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

TRUE-UP DIRECT TESTIMONY

OF

ERIN L. MALONEY

TRUE-UP DIRECT

CASE NO. ER-2006-0314

**Jefferson City, Missouri
November 2006**

**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 Begin the)
Implementation of Its Regulatory Plan)

Case No. ER-2006-0314

AFFIDAVIT OF ERIN L. MALONEY

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Erin L. Maloney, of lawful age, on her oath states: that she has participated in the preparation of the following True-Up Direct Testimony in question and answer form, consisting of 2 pages of True-Up Direct Testimony to be presented in the above case, that the answers in the following True-Up Direct Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true to the best of her knowledge and belief.


Erin L. Maloney

Subscribed and sworn to before me this 3rd day of November, 2006.



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086


Notary Public

My commission expires 9-21-10

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TRUE-UP DIRECT TESTIMONY

OF

ERIN L. MALONEY

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2006-0314

13 Q. Please state your name and business address.

14 A. My name is Erin L. Maloney and my business address is Missouri Public
15 Service Commission, P.O. Box 360, Jefferson City, MO 65102.

16 Q. Are you the same Erin L. Maloney who filed direct, rebuttal, and
17 surrebuttal testimony in this proceeding?

18 A. Yes, I am.

19 Q. Why are you filing this true-up direct testimony?

20 A. There is a change in the calculated values of the jurisdictional energy
21 allocators as a result of changes in the Net System Input (NSI) provided by Staff witness
22 Shawn E. Lange.

23 Q. Have you changed the way the jurisdictional energy allocators are
24 calculated or included any other adjustments?

25 A. No. The energy allocation factor for an individual jurisdiction is
26 calculated as the ratio of the adjusted annual kilowatt-hour (kWh) usage in the particular
27 jurisdiction to the total adjusted kWh usage in all jurisdictions. The sum of the energy
28 allocation factors across jurisdictions equals one.

29 Q. How will the change in the jurisdictional energy allocation factors affect
this case?

1 A. The re-calculated jurisdictional energy allocation factors have been
2 provided to Staff witness Phil Williams for use in the preparation of the true-up
3 accounting schedules.

4 Q. What is your recommendation?

5 A. I recommend that the Commission adopt the adjusted energy allocation
6 factors calculated from data on the attached Schedule 1 to this true-up direct testimony
7 and as shown in Table 1 as follows:

Table 1 Jurisdictional Energy Allocation Factors – True Up

	<u>Missouri Retail</u>	<u>Kansas Retail</u>	<u>Wholesale</u>
Energy	.5655	.4256	.0089

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9 Q. Does this conclude your true-up direct testimony?

10 A. Yes, it does.

Kansas City Power & Light
JURISDICTIONAL ENERGY ALLOCATION FACTORS

Case No. ER-2006-0314

Staff Recommendation

Components of Net System Input (NSI) - True Up

Normalized Energy (kWh) with Losses by Jurisdiction

	Energy (kwh) w/losses	Large Customer Annualizations**	Normalization for Weather	Additional kWh from Cust Growth**	Total KCP&L Normalized kWh	<div style="border: 1px solid black; padding: 5px;"> TRUE UP Nov-06 Jurisdictional Energy Allocation Factors 0.565502796 0.425603073 0.008894132 1 </div>
Mo Retail	9,048,186,068	(294,044)	(106,330,915)	56,502,618	8,998,063,727	
Non-Mo Retail	6,741,261,990	(12,776,736)	(108,604,842)	152,152,543	6,772,032,954	
Wholesale	143,054,274	-	(1,534,262)	-	141,520,012	
*						
NSI	15,932,502,332	(13,070,780)	(216,470,019)	208,655,161	15,911,616,694	

** Staff witness Ms. Kim Bolin provided the adjustments for large customer annualizations and additional kWh from customer growth as per her True-Up Direct Testimony.

	Energy w/losses	As Filed in Direct Testimony			Total KCP&L Normalized kWh	Jurisdictional Energy Allocation Factors as filed August 2006
		Large Customer Annualizations	Normalization for Weather	Additional kWh from Cust Growth		
Mo Retail	9,048,186,068	35,091,217	(106,330,915)	28,648,206	9,005,594,576	0.566757004
Non-Mo Retail	6,741,261,990	4,187,176	(108,604,842)	105,733,693	6,742,578,016	0.424336593
Wholesale	143,054,274	0	(1,534,262)	0	141,520,012	0.008906403
Company Use*	24,871,625				24,871,625	
NSI	15,957,373,957	39,278,393	(216,470,019)	134,381,899	15,914,564,230	1

*Company Use was removed from the NSI total as per Staff witness Shawn Lange's True-Up Direct Testimony.