

**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 | ) | Case No. ER-2007-0291 |
| to Implement its Regulatory Plan                    | ) |                       |

**STAFF’S DIRECT CASE FILING**

Comes now the Staff of the Missouri Public Service Commission (Staff) and prefiles its direct case in this proceeding. With this filing the Staff embarks on a different approach in presenting its initial cost of service review and analysis of an electric utility in a general rate case proceeding. Over the past few years the Commission has made changes in what it requires of parties in rate and other cases before it. The Commission began the practice of requiring executive summaries in testimony, requiring prehearing briefs, and limiting posthearing briefs to matters the party did not address in its prehearing brief. With this rate case filing by KCPL the Staff conducted its audit with fewer members of the Staff and is primarily presenting its direct case cost of service analysis in a report format, with limited supporting testimony in written question and answer format. From an overriding perspective, the Staff is doing so to make rate cases more manageable and understandable.<sup>1</sup> From a more narrow perspective, the Staff is doing so in Case No. ER-2007-0291 in an effort to limit or eliminate unnecessary testimony and schedules on what the Staff believes are non-issues, after having completed a full rate case audit of KCPL and after having gone to hearing in 2006 in Case No. ER-2006-0314. The Staff is proceeding in this manner to highlight the issues the Staff has with KCPL that have such a rate impact and the differences between KCPL and the Staff are of such a nature, the Staff believes it

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<sup>1</sup> The Staff is providing to KCPL and the other parties the workpapers of all Staff members who worked on the case, who have generated workpapers. The intent of filing less direct testimony and schedules is not to make the Staff’s case less transparent.

highly likely the Commission will be called upon to ultimately decide them. The report format is not an alien approach. It has been used in the past for subject areas such as depreciation.

The Staff anticipates that its rebuttal and surrebuttal filings will likely be more similar to what the Commission and the parties have traditionally seen from the Staff in rebuttal and surrebuttal filings. The parties in this case that have appeared before the Commission over a period of years will recall that several years ago the Commission held workshops on a number of topics one of which was reforming the rate case process. The Staff believes that its direct case filing being made this date is consistent with Commission rules and orders.

**Wherefore**, the Staff submits for prefiling as its direct case, the Staff's Cost of Service Report and the testimonies, in written question and answer format, of Staff witnesses Steve M. Traxler, Charles R. Hyneman, Matthew J. Barnes and Curt Wells.

Respectfully submitted,

**/s/ Nathan Williams**

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronic mail to all counsel of record this 24<sup>th</sup> day of July, 2007.

**/s/ Nathan Williams**