

Exhibit No.:  
Issues: Fuel Expense  
Witness: Leon C. Bender  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: True-Up Direct Testimony  
Case No.: ER-2007-0291  
Date Testimony Prepared: November 2, 2007

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY OPERATIONS DIVISION**

**TRUE-UP DIRECT TESTIMONY**

**OF**

**LEON C. BENDER**

**KANSAS CITY POWER AND LIGHT COMPANY**

**CASE NO. ER-2007-0291**

**Jefferson City, Missouri  
November 2007**

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of Kansas )  
City Power and Light Company for )  
Approval to Make Certain Changes in its )  
Charges for Electric Service To )  
Implement Its Regulatory Plan. )

Case No. ER-2007-0291

**AFFIDAVIT OF LEON C. BENDER**

STATE OF MISSOURI     )  
                                      ) ss  
COUNTY OF COLE     )

Leon C. Bender, of lawful age, on his oath states: that he has participated in the preparation of the following True-Up Direct Testimony in question and answer form, consisting of 3 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 him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
Leon C. Bender

Subscribed and sworn to before me this 1<sup>st</sup> day of November, 2007.



SUSAN L. SUNDERMEYER  
My Commission Expires  
September 21, 2010  
Callaway County  
Commission #0084286A

  
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Notary Public

My commission expires 9-21-10

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**TRUE-UP DIRECT TESTIMONY**

**OF**

**LEON C. BENDER**

**KANSAS CITY POWER AND LIGHT COMPANY**

**CASE NO. ER-2007-0291**

Q. Please state your name and business address.

A. Leon C. Bender, P.O. Box 360, Jefferson City, Missouri, 65102.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission Staff (Staff) as a Regulatory Engineer in the Energy Department of the Utility Operations Division.

Q. Please describe your educational and work background.

A. I received a Bachelor of Science degree in Mechanical Engineering in August 1978 from Texas Tech University. I became employed by Southwestern Public Service Company (SPS) as a power generation plant design engineer in September 1978. While employed by SPS, I was lead engineer on many projects involving design and construction of new power generating stations and the upgrading of their older plants. In 1983, I became a registered Professional Engineer in the state of Texas. In 1986, I transferred to SPS's newly formed subsidiary company, Utility Engineering Corporation, and was responsible for various projects at various other clients' power generation plants. In June 1990, I accepted employment as systems engineer with Entergy Operations, Inc. at the nuclear powered generating station, Arkansas Nuclear One. In December 1995, I joined the Missouri Public Service Commission (Commission).

True-Up Direct Testimony of  
Leon C. Bender

1 Q. Are you the same Leon C. Bender who filed results in the Staff's Direct Case  
2 Filing in this case?

3 A. Yes, I am.

4 Q. What is the purpose of your true-up direct testimony in this case?

5 A. The purpose of my testimony is to present the results of the Staff's electric  
6 production cost model simulations that were run in the true-up portion of this case to establish  
7 the amount of normalized fuel and purchased power cost for Kansas City Power & Light  
8 Company (KCPL) for the test year ending December 2006, updated through March 2007 and  
9 trued up to September 30, 2007.

10 Q. Briefly summarize the results of the production cost model true-up simulations.

11 A. The results of the production cost model simulations show that the estimated  
12 base amount of annual variable cost of fuel and net purchased power is \$196,973,750.

13 Q. Please describe the changes to the inputs to the production cost model for the  
14 true-up portion of this case.

15 A. The following changes were made to the inputs of the production cost model  
16 for the true-up time period.

- 17 1. Updated new fuel prices were supplied by Staff witness Charles  
18 Hyneman.
- 19 2. Updated new weather normalized hourly load was supplied by Staff  
20 witness Shawn Lange.
- 21 3. Updated purchased power prices were input into the model.
- 22 4. Spinning reserve requirements were increased from 40 MW's to 60  
23 MW's to reflect the way the SPP market is now operating.

True-Up Direct Testimony of  
Leon C. Bender

1           Q.     What is the test year cost of fuel and net purchased power for KCPL, as  
2 determined by the Staff's production model after adjustments have been made for true-up?

3           A.     As noted earlier, the results of the production cost model simulation show that  
4 the amount of annual variable cost of fuel and net purchased power is \$196,973,750. These  
5 results were supplied to Staff witness Charles Hyneman, who used this input in the  
6 annualization of fuel expense.

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

8           A.     Yes, it does.