

Exhibit No.:
Issue: Organization of KCPL Delivery
Witness: Nancy J. Moore
Type of Exhibit: Direct Testimony
Sponsoring Party: KCPL
Case No.: EM-2000-753
Date Testimony Prepared: September 14, 2000

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Missouri Public
Service Commission

Direct Testimony

of

Nancy J. Moore

On behalf of

Kansas City Power & Light Company

**DIRECT TESTIMONY
OF
NANCY J. MOORE
Vice President – Customer Services
Kansas City Power & Light Company**

Case No. EM-2000-753

1 Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.

2 A. My name is Nancy J. Moore. I am Vice President of Customer Services at
3 Kansas City Power & Light Company. My business address is 801 Charlotte
4 Street, Kansas City, Missouri 64106.

5 Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

6 A. I am testifying on behalf of KCPL.

7 Q. WHAT IS YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE?

8 A. I graduated from Central Missouri State University with a Bachelors of Science
9 degree in Education in 1971. In 1998, I earned my Masters of Business
10 Administration from Rockhurst College. I began my career with KCPL in 1974
11 as a secretary in the Personnel Services department. In 1980, I was promoted to
12 Supervisor of Training & Development; I became Manager of Corporate Training
13 in 1982. In 1988, I was named Assistant Manager of Distribution, Construction &
14 Maintenance. I was appointed Manager of Metering Services in 1989, and
15 Manager of Customer Services at the F&M/Northland Service Centers in 1991. I
16 became the Director of Internal Services & Purchasing in 1998, then Senior
17 Director of Customer Services in 1999. I assumed my current position as Vice
18 President of Customer Services in 2000.

1 Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS
2 PROCEEDING?

3 A. I sponsor Section V, and accompanying schedules, of the Organizational Report
4 that is attached to the Direct Testimony of A. Drue Jennings.

5 Q. DO YOU SERVE ON ANY OF THE RESTRUCTURING TEAMS
6 REFERENCED IN MS. LATZ'S DIRECT TESTIMONY?

7 A. Yes, I am a member of the Delivery/Customer Services Group, as well as the
8 Infrastructure & Services Group.

9 Q. IF KCPL'S PROPOSED REORGANIZATION PLAN IS APPROVED BY THE
10 RELEVANT REGULATORY AGENCIES, WILL KCPL DELIVERY BE
11 OBLIGATED TO PROVIDE DISTRIBUTION AND TRANSMISSION
12 SERVICES TO CUSTOMERS RESIDING IN KCPL'S CURRENT
13 CERTIFICATED SERVICE AREA?

14 A. Yes. KCPL Delivery will be obligated to provide distribution and transmission
15 services to retail customers within KCPL's current service territory. In fact
16 KCPL Delivery's retail customers will continue to receive electric service
17 pursuant to tariffs approved by the Missouri Public Service Commission and the
18 Kansas Corporation Commission. In addition to providing reliable and reasonably
19 priced distribution and transmission services, KCPL Delivery will also be
20 responsible for procuring an adequate and reliable electric supply for those
21 customers that reside in KCPL's current service territory.

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2 Q. UNDER KCPL'S PROPOSED REORGANIZATION PLAN, KCPL DELIVERY
3 WILL NOT HAVE ANY GENERATION ASSETS. PLEASE EXPLAIN HOW
4 KCPL DELIVERY WILL SATISFY ITS OBLIGATION TO SUPPLY AN
5 ADEQUATE AND RELIABLE ELECTRIC SUPPLY.

6 A. KCPL Delivery and KCPL Power will enter into a power supply agreement that
7 obligates KCPL Power to serve native load. A form of power supply agreement
8 is scheduled to be filed with the Commission in March, 2001. The charges in the
9 power supply agreement will be based on KCPL's costs of generating electricity.
10 KCPL Delivery customers will have access to the best available rates because
11 KCPL Delivery plans to seek competitive bids for incremental load growth and,
12 to the extent possible, for existing load. In other words, if a wholesale competitor
13 of KCPL Power can sell reliable energy and capacity to KCPL Delivery cheaper
14 than KCPL Power, KCPL Delivery will buy the cheaper power. The benefits of
15 cheaper power will flow to KCPL Delivery's customers.

16 Q. PLEASE DESCRIBE KCPL DELIVERY'S CORPORATE STRUCTURE.

17 A. KCPL Delivery will be a wholly-owned subsidiary of HoldingCo. The company
18 will own distribution and transmission assets. KCPL Delivery will provide
19 distribution and transmission services to retail customers who are currently being
20 served by KCPL. This will include customer service, credit and collection, and
21 community relations functions. The company will consist of four core areas:
22 Manage and Control, Asset Management, Retail Operations, and Support Services
23 & Administration.

1 Q. WILL KCPL DELIVERY CONSIDER TAKING COMPETITIVE BIDS FOR
2 SERVICES PROVIDED BY HOLDINGCO?

3 A. As I have stated earlier, KCPL Delivery will be a wholly-owned subsidiary of
4 HoldingCo. It has been determined that the services provided by the Corporate
5 Services unit of HoldingCo are critical to the long-term health of HoldingCo and
6 its corporate subsidiaries. Accordingly, none of HoldingCo's subsidiaries will be
7 permitted to bid out these vital services. However, the same is not true for the
8 services offered by the Shared Services unit of HoldingCo. The management of
9 KCPL Delivery will carefully scrutinize the quality and cost of the services
10 provided by the Shared Services unit. Under the appropriate circumstances,
11 KCPL Delivery will seek competitive bids for the services provided by the Shared
12 Services unit.

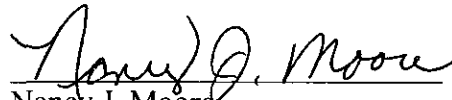
13 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

14 A. Yes.

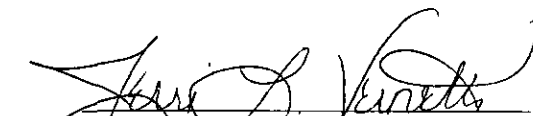
AFFIDAVIT

STATE OF MISSOURI)
)
COUNTY OF JACKSON) ss.

Nancy J. Moore, being first duly sworn, on her oath states: that she has participated in the preparation of the foregoing written testimony, in question and answer form, to be presented to the Pubic Service Commission of the State of Missouri; that the answers therein contained were given by her; that she has knowledge of the matters set forth in said answers; and that such answers are true to the best of her knowledge and belief.


Nancy J. Moore

Subscribed and sworn to before my this 12th day of September, 2000.


Notary Public
JERRI L. VERNETTI
Notary Seal - Notary Public
STATE OF MISSOURI
Clinton County
My Commission Expires December 7, 2001