

Exhibit No.:  
Issues: Fuel Expense  
Witness: Leon C. Bender  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Direct Testimony  
Case No.: ER-2006-0314  
Date Testimony Prepared: August 8, 2006

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY OPERATIONS DIVISION**

**DIRECT TESTIMONY**

**OF**

**LEON C. BENDER**

**KANSAS CITY POWER & LIGHT COMPANY**

**CASE NO. ER-2006-0314**

**Jefferson City, Missouri  
August 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

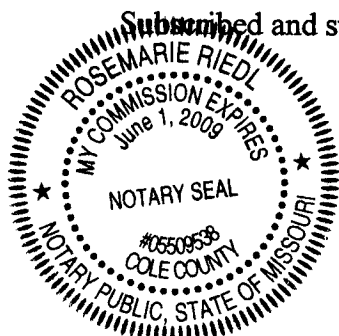
**AFFIDAVIT OF LEON C. BENDER**


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 Direct Testimony in question and answer form, consisting of 5 pages of Direct Testimony to be presented in the above case, that the answers in the following 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 7<sup>th</sup> day of August, 2006.



  
\_\_\_\_\_  
Notary Public

My commission expires June 1, 2009

**DIRECT TESTIMONY**  
**OF**  
**LEON C. BENDER**  
**KANSAS CITY POWER & LIGHT COMPANY**  
**CASE NO. ER-2006-0314**

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 a 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).

Q. Have you filed testimony in previous cases before this Commission?

1           A.     Yes I have. Please refer to Schedule 1, which is attached to my direct  
2 testimony, for a list of cases in which I have previously filed testimony.

3           Q.     What is the purpose of your testimony in this case?

4           A.     The purpose of my testimony is to present the results of the Staff's electric  
5 production cost model simulations that were run in this case to establish the amount of  
6 normalized fuel and purchased power cost for Kansas City Power & Light Company (KCPL)  
7 for the test year ending December 2005 and updated through June 2006.

8           Q.     Briefly summarize the results of the production cost model simulation.

9           A.     The results of the production cost model simulations, as shown in Schedule 2,  
10 show that the estimated base amount of annual variable cost of fuel and net purchased power  
11 is \$162,978,480.

12          Q.     What is a production cost model?

13          A.     A production cost model is a computer program used to perform an hour-by-  
14 hour chronological simulation of a utility's generation and power purchases. The model  
15 determines energy costs and fuel consumption necessary to economically meet a utility's load  
16 within the operating constraints of the utility's resources used to meet that load.

17          Q.     What is meant by an "hour-by-hour" chronological simulation of a utility's  
18 generation and net power purchases?

19          A.     The production cost model operates in a chronological fashion, meeting each  
20 hour's energy demand before moving to the next hour. It will schedule generating units to  
21 dispatch in a least cost manner based upon fuel cost and the cost of purchased power taking  
22 into account generation unit operation constraints. This model closely simulates the way the

1 company should dispatch its generating units and purchase power to meet the net system load  
2 in a least cost manner.

3 Q. What production cost model did the Staff use in this case?

4 A. The RealTime ® production cost model was used.

5 Q. What were the sources for data used in the model?

6 A. The sources for data used in the model are listed in Schedule 3.

7 Q. What is purchased power?

8 A. Purchased power is the hourly energy which is purchased in the market place  
9 from another electric supplier and which is used to help meet the load of the electric utility.  
10 Purchased power is also commonly referred to as wholesale power. Staff groups purchased  
11 power into two general categories: firm purchases from contracts and spot market purchases.

12 Q. Does KCPL use purchased power to serve native load?

13 A. Yes. KCPL purchases power from other sources during times of plant forced  
14 or planned outages and during times when it is more economical to purchase power rather  
15 than generate power.

16 Q. What were the sources of data used to calculate purchased power prices and to  
17 determine the amount of energy available for purchase?

18 A. The data used to calculate purchased power prices and to determine the  
19 amount of energy available was determined from KCPL purchase and sales data from the test  
20 year and update period submitted to Staff by KCPL, as required by Commission Rule 4 CSR  
21 240-3.190 (3.190 data) and in response to Staff Data Request number 114.

22 Q. What are spot market purchases?

1           A.     Spot market purchases are purchases of energy made on an hourly basis rather  
2     than through a longer-term contract. The purchasing company decides to buy spot energy  
3     from one or more suppliers based on the economics and availability of its generating units  
4     and capacity purchases. Purchases of spot energy are made in order to lower costs when the  
5     spot market price is below both the marginal cost of providing that energy from the  
6     company's generating units and the cost of capacity purchases. Since the spot market  
7     depends on energy supply and demand in each hour, the prices tend to be much more volatile  
8     than capacity purchases.

9           Q.     What methodology did you use to determine the spot market purchased energy  
10    prices?

11          A.     I used a procedure developed by the Commission's Energy Department-  
12    Engineering Section described in the document entitled A Methodology to Calculate  
13    Representative Prices for Purchased Energy in the Spot Market (March 18, 1996). The  
14    method uses a statistical calculation based on the truncated normal distribution curve to  
15    represent the hourly purchased power prices in the spot market. KCPL's actual hourly non-  
16    contract transaction prices in the period of twelve months ending June 30, 2006, obtained  
17    from KCPL's 3.190 data, are used as price inputs in the calculation. The calculation yields a  
18    spot energy price for each hour of the year.

19          Q.     How did you determine spot purchased energy available?

20          A.     I used the same spot purchased energy available as did KCPL in their model  
21    for spot purchased energy available. I analyzed the purchases and sales data submitted to  
22    Staff by KCPL, as required by Commission Rule 4 CSR 240-3.190 and in response to Staff  
23    Data Request number 114. This analysis revealed that the available amount of energy used

Direct Testimony  
Of Leon C. Bender

1 by KCPL in their model was appropriate in the instant case. The amount was input into  
2 Staff's production cost model to calculate the amount of spot energy purchased to meet load  
3 in a least cost manner.

4 Q. What fuel prices were used in the production cost model?

5 A. I used the fuel prices provided by Staff witness Charles Hyneman.

6 Q. What is the test year cost of fuel and net purchased power, as determined by  
7 the Staff's production model for KCPL?

8 A. As noted earlier, the results of the production cost model simulation, as shown  
9 in Schedule 2, show that the amount of annual variable cost of fuel and net purchased power  
10 is \$162,978,480. These amounts were supplied to Staff witness Charles Hyneman, who used  
11 this input in the annualization of fuel expense. For further discussion of how Staff annualized  
12 the overall fuel expense in this case, please see Staff witness Charles Hyneman's direct  
13 testimony.

14 Q. Does this conclude your direct testimony?

15 A. Yes, it does.

## Schedule 1

### List of Previously Filed Testimony

- |                 |                                       |
|-----------------|---------------------------------------|
| 1. EA-2006-0309 | Aquila, Inc.                          |
| 2. ER-2005-0436 | Aquila, Inc.                          |
| 3. ER-2004-0570 | The Empire District Electric Company  |
| 4. ER-2004-0034 | Aquila, Inc.                          |
| 5. EC-2002-0001 | Union Electric Company d/b/a AmerenUE |
| 6. ER-2001-0299 | The Empire District Electric Company  |
| 7. EM-97-0515   | Kansas City Power & Light Company     |
| 8. ER-97-0394   | Utilicorp United, Inc.                |
| 9. EC-97-0362   | Utilicorp United, Inc.                |



Schedule 2

**Summary of Results of Staffs Production Cost Model**

<b>Totals</b>		Fuel expenses (cost (\$))	\$140,830,980
Generation (energy (MWH))	15,614,530	Purchases (cost (\$))	\$22,147,500
Purchases (energy (MWH))	300,104	Total expense (cost (\$))	\$162,978,480
Total Normalized Load (MWH)	15,914,633	Average Cost (\$/MWH)	\$10.24

Schedule 3

Input Data Sources

<u>INPUT</u>	<u>SOURCE</u>
Fuel Prices	Supplied by Staff witness Charles Hyneman
Unit Maintenance History	4 CSR 240-3.190 data DR's 29.1, 55, 57
Generation Unit Specific Data	DR's 29.1, 69, 116, 118, 125, 129, 130
Weather Normalized Hourly Load	Supplied by Staff Witness Shawn E. Lange
Purchase Power Contracts; Capacities and Prices	4 CSR 240-3.190 data DR 29.1, 114, 124