Exhibit No.:

Issues:

Revenue Witness: Curt Wells

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

CURT WELLS

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2006-0314

Jefferson City, Missouri November 2006

Staff Exhibit No. 161

Case No(s). 52-2006-0314

Date 1116 06 Rptr M

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application City Power & Light Con Approval to Make Certain Charges for Electric Service of Implementation of Its Regulate	ompany for nanges in its to Begin the		Case No. ER-2006	5-0314				
AFFIDAVIT OF CURT WELLS								
STATE OF MISSOURI COUNTY OF COLE)) ss)							
Curt Wells, 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 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.								
			int Walls					
Curt Wells Subscribed and sworn to before me this 3 day of November, 2006.								
SUSAN L. SUNDERME My Commission Expir September 21, 2010 Callaway County Commission #0694200	es)	Su	Notary Public	lirmeyer				
My commission expires 9	-21-10							

1	Table of Contents
3	TRUE-UP DIRECT TESTIMONY
4	OF
6	
8	CURT WELLS
9 10	KANSAS CITY POWER & LIGHT COMPANY
11	CASE NO. ER-2006-0314
12 13	EXECUTIVE SUMMARY
14	REVISIONS/UPDATES

1	TRUE-UP DIRECT TESTIMONY
3	OF
5	CURT WELLS
6 7	KANSAS CITY POWER & LIGHT COMPANY
8 9 10	CASE NO. ER-2006-0314
11 12	Q. Please state your name and business address.
13	A. My name is Curt Wells and my business address is Missouri Public Service
14	Commission, P. O. Box 360, Jefferson City, Missouri, 65102.
15	Q. Are you the same Curt Wells who has submitted direct testimony in this case?
16	A. Yes, I am.
17	EXECUTIVE SUMMARY
18	Q. What is the purpose of your True-Up Direct testimony?
19	A. My True-Up Direct testimony describes changes I made to my Schedule W-1
20	subsequent to my direct filing resulting from: 1) data revisions and updates to Missouri retail
21	rate revenues provided by Kansas City Power & Light Company (KCP&L or Company)
22	throughout this case; 2) an adjustment to my Missouri retail revenue calculations; and 3)
23	allocations from Other Rate Revenue to the rate classes. My attached Schedule CW-1(True-
24	up) presents total Missouri Rate Revenue incorporating all changes through true-up.
25	<u>REVISIONS/UPDATES</u>
26	Q. What prompted the updates from KCP&L to Missouri retail rate revenue?

True-Up Direct Testimony of Curt Wells

- A. As a result of discussions with KCP&L, it became apparent that some data it provided had not been updated to reflect the last quarter of the test year. KCP&L provided that update, resulting in changes to the Small General Service, Lighting, Special Contract, and Other Rate Revenue categories of my Schedule CW-1.
 - Q. What adjustment to your revenue calculations did you make?
- A. I adjusted normalized revenue under the Other Rate Revenue category. Subsequent to the filing of my direct testimony, I spoke with KCP&L witnesses Tim Rush and Lois Liechti concerning KCP&L's method of weather normalizing revenue for manual billings and other revenue adjustments. They stated that weather normalized sales and revenues for these categories had already been allocated by rate group in KCP&L's Bill Frequency numbers and included in normalized revenue for each rate group. They stated that weather normalizing these revenues again under "Other Rate Revenue" would result in double-counting the revenue. I accepted their explanation and reduced normalized revenue in these areas to reflect KCP&L's figures.
 - O. What other changes did you make?
- A. To better reflect revenue by class, I moved these revenues from "Other Rate Revenue" and assigned them to the appropriate rate classes. I also removed KCP&L's weather normalization adjustment from the large power rate class. Staff has determined that this class is not weather sensitive and should not have been adjusted. I also removed unbilled revenue from the calculation of Missouri rate revenue to be consistent with the Company's use of billing data.
 - Q. Did Staff make any other revisions to Missouri retail rate revenues?

True-Up Direct Testimony of Curt Wells

- A. Yes. Staff witness Kim Bolin provided updated growth/annualization adjustments to my Schedule CW-1(True-up) as a result of the above changes and true-up adjustments.
- Q. How will the revenues shown on your Schedule CW-1(True-up) be used in this case?
- A. Total Missouri Rate Revenue (Including Growth/Annualization) as shown on Schedule CW-1(True-up) will be used in determining new rates for KCP&L. It is anticipated that these new rates will be developed in accordance with the <u>Stipulation and Agreement Regarding Class Cost-of-Service and Rate Design Issues</u>, filed recently in this case, provided that the document receives Commission approval. Each rate element of those rates will be factored up by multiplying that element by the sum of one plus the result of dividing any overall increase in Company revenue requirement the Commission orders in this case by Total Missouri Rate Revenue.
 - Q. Does this conclude your true-up direct testimony?
 - A. Yes, it does.

The Kansas City Power & Light Company - Case No. ER-2006-0314 Summary of Missouri Rate Revenue

Rate Schedule	Revenue	Weather Adjustments	Normalized Revenue	Growth/ Annualization Adjustment	Total Revenue Including Growth/ Annualization
TOTAL LARGE GENERAL SERVICE	\$109,845,844	(\$202,257)	\$109,643,587	\$1,510,225	\$111,153,812
TOTAL LARGE POWER	\$95,799,355		\$95,799,355	(\$81,319)	\$95,718,036
TOTAL MEDIUM GENERAL SERVICE	\$62,938,767	(\$488,594)	\$62,450,173	\$429,770	\$62,879,943
TOTAL SMALL GENERAL SERVICE	\$37,440,367	(\$190,749)	\$37,249,618	\$59,890	\$37,309,508
TOTAL RESIDENTIAL	\$175,465,535	(\$4,943,642)	\$170,521,893	\$1,022,028	\$171,543,921
TOTAL LIGHTING	\$5,789,960	\$0	\$5,789,960	\$0	\$5,789,960
Special Contract	\$201,696	(\$436)	\$201,260	\$0	\$201,260
MO Rev Adj (Residential & Commercial)	(\$74,114)	\$74,114	\$0	\$0	\$0
MISSOURI RATE REVENUE	\$487,407,409	(\$5,751,563)	\$481,655,846	\$2,940,594	\$484,596,440