

Exhibit 17

Exhibit No.:KCP:L - 17Issue:Off-system sales margin adjustmentsWitness:Burton L. CrawfordType of Exhibit:Surrebuttal TestimonySponsoring Party:Kansas City Power & Light CompanyCase No.:ER-2010-0355Date Testimony Prepared:January 5, 2011

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2010-0355

SURREBUTTAL TESTIMONY

OF

BURTON L. CRAWFORD

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

Kansas City, Missouri January 2011

 $\frac{|C(PL = Exhibit No. KCPL 17)}{Date \sqrt{3}/11} Reporter AIS}$ File No. <u>Fe-2010-0355</u>

SURREBUTTAL TESTIMONY

OF

BURTON L. CRAWFORD

Case No. ER-2010-0355

1	Q:	Please state your name and business address.
2	A:	My name is Burton L. Crawford. My business address is 1200 Main, Kansas City,
3		Missouri 64105.
4	Q:	Are you the same Burton L. Crawford who prefiled direct and rebuttal testimony in
5		this matter?
6	A:	Yes.
7	Q:	What is the purpose of your surrebuttal testimony?
8	A:	The purpose of my testimony is to rebut issues raised by Staff witness V. William Harris
9		concerning SPP line loss charges and revenues.
10	Q:	Please describe the position taken by Staff concerning SPP line loss charges and
11		revenues.
12	A:	Staff has opposed the adjustment proposed by KCP&L to include SPP line loss charges in
13		the calculation of KCP&L's off-system sales margin. While Staff opposes including the
14		SPP line loss charges, they do include SPP line loss revenues in the calculation of the off-
15		system sales margin. In rebuttal testimony, Mr. Harris has proposed an alternative SPP
16		line loss revenue treatment. The alternative is to include SPP "line loss revenues in
17		KCPL's revenue requirement (separate and apart from Mr. Schnitzer's projected level of
18		OSS margin)" (Harris rebuttal, page 4, lines 10-12).
19	Q:	Do you agree with Staff's proposed treatment of SPP line loss charges?

A: No. Staff continues to reject this expense. As more fully explained in my rebuttal
testimony in this case, these are expenses directly incurred by KCP&L as part of making
off-system sales and as such should be recoverable as an off-system sales expense. In
addition, Staff's position creates a mismatch between expenses and revenues. The SPP
line loss revenue that Staff agrees should be included is funded by the very charges that
Staff excludes, that is the SPP line loss charges.

7 Q: Does the Company have an alternative proposal for the Commission to consider

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concerning SPP line loss charges?

9 A: Yes. Assuming that the Commission determines that the SPP line loss charges should not
10 be included in the calculation of KCP&L's off-system sales margins as the Company has
11 proposed, at a minimum the Commission should recognize these expenses incurred by
12 the Company and allow them to be recovered in KCP&L's revenue requirement. While
13 this is not the Company's preferred approach, it would at least be consistent with Staff's
14 alternative treatment for SPP line loss revenues and allow for the Company to recover
15 these legitimately incurred expenses.

- 16 Q: Does that conclude your testimony?
- 17 A: Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas City) Power & Light Company to Modify Its Tariffs to) Continue the Implementation of Its Regulatory Plan)

Docket No. ER-2010-0355

AFFIDAVIT OF BURTON L. CRAWFORD

STATE OF MISSOURI)) ss COUNTY OF JACKSON)

Burton L. Crawford, being first duly sworn on his oath, states:

 My name is Burton L. Crawford. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Senior Manager, Energy Resource Management.

2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Kansas City Power & Light Company consisting of $\pm \infty$

(_____) pages, having been prepared in written form for introduction into evidence in the abovecaptioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Burton L. Crawford

 5^{th} day of January, 2011. Subscribed and sworn before me this ____ nicor n. L Notary Public Feb. 4 2011 My commission expires: NOTARY SEAL Nicole A Wehry, Notary Public Jackson County, State of Missouri My Commission Expires 2/4/2011 Commission Number 07391200