

**PUBLIC VERSION**  
*Certain Schedules Attached To This Testimony  
Contain "Confidential" Information And Have Been Removed.*

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

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**DIRECT TESTIMONY OF**

**BRADLEY D. LUTZ**

**ON BEHALF OF  
KANSAS CITY POWER & LIGHT COMPANY**

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**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. 07-KCPE-\_\_\_\_-RTS**

1   **Q:   Please state your name and business address.**

2   A:   My name is Bradley D. Lutz. My business address is 1201 Walnut, Kansas City,  
3       Missouri 64106-2124.

4   **Q:   By whom and in what capacity are you employed?**

5   A:   I am employed by Kansas City Power & Light Company ("KCP&L" or "Company") as a  
6       Senior Regulatory Analyst.

7   **Q:   What are your responsibilities?**

8   A:   My responsibilities include regulatory reporting, the preparation of miscellaneous  
9       regulatory filings and activities related to the Company's Rules and Regulations, formal  
10      customer complaints, evaluating and developing new tariffs related to KCP&L's Demand

1 Response, Efficiency, and Affordability programs, and various regulatory studies  
2 including the class cost of service (“CCOS”) study.

3 **Q: Please describe your education, experience and employment history.**

4 A: I hold a Master of Business Administration from Northwest Missouri State University  
5 and a Bachelor of Science degree in Engineering Technology from Missouri Western  
6 State University.

7 I have been employed by KCP&L in my current position since September 2005. I  
8 joined the Company in August 2002, as an Auditor in the Audit Services Department.  
9 Prior to joining KCP&L, I was employed by the St. Joseph Frontier Casino for two years  
10 as Information Technology Manager. Prior to St. Joseph Frontier Casino, I was  
11 employed by St. Joseph Light and Power Company for nearly 14 years. I held various  
12 positions at St. Joseph Light and Power Company, including Engineering Technician-  
13 Distribution, Automated Mapping/Facilities Management Coordinator, and my final  
14 position as Senior Client Support Specialist-Information Technology.

15 **Q: Have you previously testified in a proceeding at the Kansas Corporation  
16 Commission (“KCC”) or before any other utility regulatory agency?**

17 A: Yes. I provided direct and rebuttal testimony in KCC Docket No. 07-KCPE-905-RTS.

18 **Q: What is the purpose of your testimony?**

19 A: KCC Docket No. 07-KCPE-905-RTS (the “2007 Rate Case”) was filed as the second of  
20 four rate cases contemplated under the approved Stipulation and Agreement in KCC  
21 Docket No. 04-KCPE-1025-GIE (“Regulatory Plan Stipulation”). KCP&L’s 2007 Rate  
22 Case was resolved when the parties entered into a Stipulation and Agreement, which the  
23 KCC approved on November 20, 2007. The 2007 Rate Case Stipulation and Agreement

1 included a requirement that KCP&L file a CCOS study with its next formal rate case.  
2 The purpose of my testimony in this case is to present the results of KCP&L's CCOS  
3 study.

4 **Q: What is the purpose of the CCOS study?**

5 A: The purpose of the CCOS study is to determine the contribution that each customer class  
6 makes toward the Company's overall rate of return. The CCOS analysis strives to  
7 attribute costs in relationship to the cost-causing factors of demand, energy, and  
8 customers.

9 **Q: What classes were selected as a basis for this CCOS study?**

10 A: The classes the Company included in the CCOS study are Residential, Small General  
11 Service, Medium General Service, Large General Service, Large Power Service, Off-  
12 Peak Lighting and Other Lighting. While the Off-Peak Lighting and Other Lighting  
13 classes are included in the study, the results were not evaluated since they are not  
14 necessarily reliable, as I discuss later in my testimony.

15 **Q: Do these classes conform to the current electric rate tariffs?**

16 A: Yes. The Residential Service class has several rate classifications available within it that  
17 include Residential General Use, Residential General Use and Water Heat – One Meter,  
18 Residential General Use and Space Heat – One Meter, Residential General Use and  
19 Space Heat – 2 Meters, Residential General Use and Water Heat and Separately Metered  
20 Space Heat – 2 Meters, and Residential Time of Day Service. The Small General  
21 Service, Medium General Service and Large General Service classes also have general  
22 usage rates and all-electric rates, plus they are specific to the voltage level at which the  
23 customer receives service. The Large Power Service class is distinguished by the specific

1 voltage at which the customer receives service. In total, the Company has five (5)  
2 general categories of service (plus Lighting), but has many rate categories to meet the  
3 specific needs and configuration of delivered service of the customer and reporting and  
4 billing requirements.

5 **Q: What test period was used for the CCOS study?**

6 A: The test period for the CCOS study is the historical 12-month period ending December  
7 2007 as adjusted and presented in the Direct Testimony of Company witness  
8 John Weisensee.

9 **Q: Please provide an outline of the CCOS study as you are using it in this case.**

10 A: In the context of this proceeding, KCP&L set out to perform an analysis of the expenses,  
11 investments and revenues for the test period. These expenses, investments and revenues  
12 were evaluated to identify their relation to providing service to various classes of  
13 customers and to determine their relative returns on rate base. The result of this analysis  
14 is the CCOS study.

15 **Q: Is the data supporting expenses, investments and revenues used in the CCOS study  
16 the same as those used in the Jurisdictional Revenue Requirement study?**

17 A: Yes.

18 **Q: What general categories of cost were examined and considered in the development  
19 of the CCOS study?**

20 A: An analysis was made of all elements of investment (rate base) and expense (cost of  
21 service) for the purpose of allocating these items to the customer classes. The first step in  
22 this process was to functionalize costs.

23 **Q: Please explain what you mean by “functionalize costs.”**

1 A: In order to make the appropriate assignment of costs to the appropriate class of customer,  
2 it is necessary to first group the costs according to their function. The functions used in  
3 the CCOS study were production, transmission, distribution, and other costs.

4 **Q: Were these costs then assigned to the customer classes?**

5 A: No. After making the functional assignments of costs, the next step was to classify the  
6 costs.

7 **Q: Please explain what you mean by “classify costs.”**

8 A: Functionalized costs are examined to determine if they are customer-related, energy-  
9 related, or demand-related.

10 **Q: What do you mean by customer-related, energy-related and demand-related?**

11 A: Customer-related costs are those costs necessary to provide electric service to the  
12 customer. Some examples of these costs include meter reading, customer accounting,  
13 billing, and some investment in plant equipment such as the meter, service line and other  
14 minimal distribution facilities necessary to make service available. Portions of the  
15 distribution facility are separated between the customer costs and the demand costs.  
16 Energy-related costs are directly related to the consumption of energy and consist of such  
17 things as fuel and purchased power. Demand-related costs relate to the investment and  
18 expenses associated with the Company's facilities necessary to supply the customer's  
19 energy and load requirements at various load levels. The majority of demand-related  
20 costs consist of production, transmission and the non-customer portion of distribution  
21 plant.

1 **Q: Did the Company perform any special cost studies in order to determine the**  
2 **customer, energy and demand components when the investments or expense were**  
3 **within the same account?**

4 A: The Company filed a CCOS study in its 2006 Rate Case Docket No. 06-KCPE-828-RTS.  
5 As part of that case, special studies were performed in order to evaluate various costs.  
6 Many of the special study results were reviewed and determined to be appropriate for use  
7 in this study. They include:

- 8 a) Primary/secondary split of distribution investment contained in Federal Energy  
9 Regulatory Commission (“FERC”) accounts #364 through #367;
- 10 b) Customer/demand split of distribution investment contained in FERC accounts  
11 #364 through #368;
- 12 c) Meter cost study (typical installed meter and associated replacement cost);
- 13 d) Service line cost study (typical installed service line and associated replacement  
14 cost);
- 15 e) Meter reading;
- 16 f) Billing; and
- 17 g) Losses (load and no load).

18 For this CCOS study all of the special studies were reviewed and updated with data from  
19 the test period as necessary to reflect the current position of the Company.

20 **Q: With the above classification of plant investment and operating costs into customer-,**  
21 **energy-, and demand-related components, what was the next step in the CCOS**  
22 **study?**

1 A: The next step was to allocate each of the three categories of cost to each customer class  
2 utilizing allocation factors appropriate for each of the above categories of cost.

3 **Q: How are the allocation factors for customer-related costs generally determined?**

4 A: Customer-related costs are generally allocated on the basis of the number of customers  
5 within each class. Data for the development of the customer-related allocation factors  
6 came from Company billing and accounting records. Some of the customer-related  
7 accounts were allocated based on a weighted number of customers to reflect the different  
8 magnitudes of cost associated with serving those customers.

9 **Q: How are the allocation factors for the energy-related costs generally determined?**

10 A: Energy-related allocation factors were derived on the basis of the respective energy  
11 (kilowatt hour) requirements for each customer class. Kilowatt-hour sales to each  
12 customer class were available from Company records. The sales data was adjusted to  
13 reflect normal weather, system losses and unaccounted for, in order to assign the  
14 Company's total system output. Company witness George McCollister described this  
15 process in his Direct Testimony.

16 **Q: Was the data for the development of class demand allocation factors also available  
17 from Company billing records?**

18 A: No. The data necessary to develop class demand allocation factors (production and  
19 transmission) were derived from the Company's load research data. Such data consisted  
20 of the hour-by-hour use of electricity by each customer class throughout the study period.  
21 Consideration of system losses, unaccounted for, and sampling error was taken into  
22 account in determining the class demands. Company witness George McCollister  
23 described this process in his Direct Testimony.

1 **Q: Was KCP&L's load research data used to develop any other allocators?**

2 A: Yes, it was used to develop distribution plant allocators based on customers'  
3 non-coincident loads within each class.

4 **Q: Are any costs assigned directly to classes?**

5 A: Yes. In those instances where the costs are clearly attributable to a specific class, they  
6 are directly assigned to that class.

7 **Q: After the determination of customer, energy and demand allocation factors for the**  
8 **various elements of the Company's costs, what is the next step in the completion of a**  
9 **CCOS study?**

10 A: The next step is to apply the determined allocation factors to each element of rate base  
11 and expense in the CCOS study.

12 **Q: Would you describe the various allocation factors and how they were applied to**  
13 **each account?**

14 A: Yes. In fairly simple terms, the Company used an allocation method called the Average  
15 and Peak method to allocate production and transmission plant. This gives classes  
16 recognition for both usage and contribution to peak load. The demand portion of the  
17 distribution plant and related expense was allocated on two types of non-coincident  
18 demand ("NCD"). Substation related equipment and expense were allocated on class  
19 NCD allocators, while delivery equipment and expense were allocated on customer NCD  
20 allocators. The customer portion of the distribution plant and related expense was  
21 allocated based on the weighted number of customers. General and intangible plant was  
22 allocated based on the sum of combinations of production, transmission, and distribution



1 plant accounts. For example, if no production-related plant was in the account, it was  
2 allocated based on an allocator that included only transmission and distribution plant.

3 **Q: Why did the Company select the Average & Peak method using 1CP?**

4 A: There are several reasons for selecting the Average & Peak (1CP) method. They include:

5 a) The load research sample data was designed based on the system peak demand  
6 conditions, thereby the results of the data are designed to give the most accurate  
7 data for that period.

8 b) Average demand is quite accurate in that it comes directly from the Company's  
9 actual books and records.

10 c) The Average & Peak (1CP) method recognizes that our electric utility system is  
11 designed to meet both peak demands and energy requirements, and that the  
12 production and transmission equipment are designed to meet both.

13 d) Our system load factor is approximately 50%, meaning that the average load is  
14 equal to approximately 50% of the peak demand, therefore recognizing the  
15 average demand allocation and peak demand allocation equally reflects our  
16 current load factor conditions.

17 e) Consistency with our prior study. Our 2006 and 2007 CCOS studies were  
18 completed using the Average & Peak (1CP) method. Consistency helps facilitate  
19 comparisons between the results.

20 **Q: Have any allocation methods changed from the study submitted last year in the 2007**  
21 **Rate Case?**

22 A: Yes. Besides updating the factors, a new allocator was added for the Energy Efficiency  
23 Rider.

1 **Q: Why were the allocators changed?**

2 A: As part of the settlement Stipulation and Agreement for the 2007 Rate Case the Company  
3 agreed to utilize an Energy Efficiency Rider to recover Demand Side Management  
4 related costs. A new allocator was needed to properly distribute the associated revenues  
5 and expenses to the non-lighting classes impacted by the Rider.

6 **Q: Did you consider changing any other allocators for this study?**

7 A: Yes. We considered changing the production allocator to the Base-Intermediate-Peak  
8 (“BIP”) Method.

9 **Q: What is the BIP Method?**

10 A: The BIP method is best described by the National Association of Regulatory Utility  
11 Commissioners in their *Electric Utility Cost Allocation Manual*. It states:

12 The BIP method is a time differentiated method that assigns  
13 production plant costs to three rating periods: 1) peak hours, 2)  
14 secondary peak (intermediate, or shoulder hours) and 3) base loading  
15 hours. This method is based on the concept that the specific utility  
16 generation resources can be assigned in the cost of service analysis as  
17 serving different components of load; i.e., the base, intermediate and  
18 peak loads components.<sup>1</sup>

19 Once divided to the different load types, the associated production costs may be divided  
20 and allocated using a combination of other techniques. For example, costs associated  
21 with the base load could be allocated based on energy usage, costs associated with the

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<sup>1</sup> Electric Utility Cost Allocation Manual, January 1992, National Associated of Regulatory Utility Commissioners, page 60.

1 intermediate loads could be allocated using the 12 coincident peak method and the  
2 peaking costs could be allocated on the 4 coincident peak method.

3 **Q: Why did you consider this allocator?**

4 A: As stated earlier, the Company supports an allocation method called the Average & Peak  
5 method because it recognizes both usage and contribution to peak load. The Company  
6 views the BIP method as a refinement of this approach. The BIP method would allow us  
7 to continue to recognize the dual nature of our generating resources and give us a  
8 structured and more precise way to incorporate the new Iatan 2 generating station into our  
9 rates. Further, the BIP method introduces sufficient detail into the causation of  
10 production costs to allow a detailed examination of seasonal costs and the resulting  
11 seasonal rate allocations.

12 **Q: Why didn't you use the BIP method in this filing?**

13 A: We are still examining the allocation method and would like to better understand it before  
14 proposing it in Kansas. The BIP method is being introduced in our Missouri jurisdiction  
15 through the work of Mr. Paul Normand, a consultant with Management Applications  
16 Consulting. Mr. Normand is a long-time advocate of the method and proposed it as part  
17 of a filing required by the Missouri Commission.

18 **Q: What is the next step in the CCOS study once the allocations are applied to the  
19 various rate base, revenue and expense accounts?**

20 A: The next step is to determine the relative return on rate base for each of the classes in the  
21 study. The ratio of class revenues less expenses (net operating income) divided by class  
22 rate base will indicate the rate of return being earned by the Company that is attributable  
23 to a particular class. It is necessary to keep in mind that this is a snapshot in time. The

1 results of the CCOS study will most likely vary over time. The results of the study will  
2 also vary if you apply different allocation factors to the study. By applying different  
3 methods to the allocation process, one can change the outcome of the CCOS study.

4 **Q: What are the results of the Company's CCOS study that was prepared and is being**  
5 **submitting in this case?**

6 A: Schedule BDL-1 (**Confidential**), is a summary of revenue and expenses, net operating  
7 income, rate base and rate of return for the total Company and the classes used in this  
8 study. Page 1 of Schedule BDL-1 (**Confidential**) reflects class returns for the test period.  
9 Page 2 reflects equalized return on equity for all classes and the resulting revenue  
10 adjustments, applied before any approved increase in rate revenue, that would be required  
11 to cause the classes to provide the same rate of return.

12 **Q: What conclusions have you made from the results of the CCOS study?**

13 A: The individual classes' rate of return at current rates vary, and are shown in the following  
14 table.

<b>Class Rate of Return at Current Rates</b>				
<b>Residential Service</b>	<b>Small General Service</b>	<b>Medium General Service</b>	<b>Large General Service</b>	<b>Large Power Service</b>
5.44%	6.33%	9.04%	5.59%	2.16%

15 **Table 1**

16 **Q: If rates were changed so that KCP&L earned the same rate of return from each**  
17 **customer class, how much would each class' rates need to change?**

18 A: By the percentages in the table below.

<b>Change Required to Equalize Returns</b>				
<b>Residential Service</b>	<b>Small General Service</b>	<b>Medium General Service</b>	<b>Large General Service</b>	<b>Large Power Service</b>
1.99%	-2.26%	-13.05%	1.23%	11.60%

19 **Table 2**

1 **Q: Off-Peak Lighting and Other Lighting are included in your study but not listed in**  
2 **Table 1 or Table 2. Why?**

3 A: In prior cases it has been acknowledged that the rate of return for lighting classes is  
4 questionable. It is difficult to calculate the true cost of lighting service due to the  
5 distinctiveness of the load pattern and other issues used in determining traditional CCOS  
6 studies. Lights are operating at maximum load during the night and at zero load during  
7 the day. Unless the allocation method considers hourly operating characteristics, the  
8 results are implausible and may seem distorted from the results for the other classes. The  
9 Company believes that dedicated studies of the lighting classes would be required to  
10 appropriately evaluate their rate of return.

11 **Q: Can you explain the significant difference between the Large General Service and**  
12 **the Large Power classes relative to the others?**

13 A: Yes. In the settlement of the 2007 Rate Case the parties agreed to apply the approved  
14 revenue increase directly to the Residential, Large Power and Other Lighting classes.  
15 This had the unexpected impact of breaking the relationship between the Large Power  
16 and Large General Service classes. In 2008, nearly all of the Large Power customers  
17 moved to the Large General Service class, leaving only three customers in the Large  
18 Power Class.

19 **Q: Do you have any concerns about the large shift in customers?**

20 A: Yes. With only three customers in the Large Power class we cannot utilize the CCOS  
21 study results to properly evaluate the relative rates of return for rate design purposes. It  
22 might be reasonable to recombine the Large General Service and Large Power classes to

1 approximate the real rate of return. Regardless, the results should be considered  
2 inconclusive and would not warrant any class shifts as part of this case.

3 **Q: What rate adjustments are being proposed for each class?**

4 A: The Company does not propose to change the current relationship of customer class  
5 returns to the average jurisdictional return. The Company is recommending an equal  
6 percentage increase be applied to all customer classes with no changes to rate design.  
7 The tariffs filed with this case are based on applying the overall percentage increase to all  
8 tariffs (17.50%). Company witness Tim Rush addresses the rate design as part of his  
9 Direct Testimony.

10 **Q: Why are you not suggesting further changes based on the outcome of the CCOS**  
11 **study?**

12 A: It is the Company's position that any additional shift in revenue requirement among  
13 classes for the purpose of achieving equal returns of all classes is more appropriately  
14 addressed in a future rate design case. Because of the significant investments the  
15 Company is making, including investments in customer programs designed to assist  
16 customers in managing their energy bills, it is premature to align average class rates of  
17 return in this case. It is KCP&L's belief that the appropriate time to move toward equal  
18 rate of return for all customer classes is after completion of the Regulatory Plan and the  
19 in-service date of Iatan 2.

20 **Q: Does that conclude your testimony?**

21 A: Yes, it does.



KANSAS CITY POWER & LIGHT COMPANY  
 DOCKET NO. \_\_\_\_\_  
 CLASS COST OF SERVICE FOR KANSAS CUSTOMERS  
 FOR THE TEST YEAR ENDED DECEMBER 31, 2007

SCHEDULE 1  
 PAGE 1

LINE NO.	DESCRIPTION	ALLOCATION BASIS	KANSAS RETAIL COL. 601		RESIDENTIAL GEN. SERVICE COL. 602		SMALL GEN. SERVICE COL. 603		MEDIUM GEN. SERVICE COL. 604		LARGE GEN. SERVICE COL. 605		LARGE PWR SERVICE COL. 606		OFF-PEAK LIGHTING COL. 607		OTHER LIGHTING COL. 608	
			(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)						
0010	SCHEDULE 1 - SUMMARY OF OPERATING INC & RATE BASE																	
0020	OPERATING REVENUE	TSFR 2 870	554,133,187	275,891,586	34,879,852	66,759,587	156,036,290	11,173,491	3,153,216	6,239,165								
0040	OPERATING EXPENSES																	
0060	FUEL	TSFR 4 3940	101,560,200	44,529,744	4,855,545	11,677,023	36,372,052	3,275,239	486,526	364,072								
0070	PURCHASED POWER	TSFR 4 3950	25,946,066	11,604,235	1,248,522	2,962,201	9,113,999	815,678	114,982	86,448								
0080	OTHER OPERATION & MAINTENANCE EXPENSES	TSFR 4 3960	201,865,909	106,809,531	12,902,554	21,041,941	52,757,705	4,080,456	521,456	3,752,267								
0090	DEPRECIATION EXPENSES (NET OF CLEARINGS)	TSFR 5 1420	76,728,912	40,202,661	5,305,525	8,271,996	19,890,841	1,452,304	190,710	1,414,876								
0100	AMORTIZATION EXPENSES	TSFR 5 1650	20,626,074	10,168,165	1,161,714	2,161,242	6,408,969	562,245	95,337	68,402								
0110	INTEREST ON CUSTOMER DEPOSITS	CUST121	90,512	3,803	66,561	12,508	3,463	10	4,147	0								
0120	TAXES OTHER THAN INCOME TAXES	TSFR 6 560	33,900,399	17,842,315	2,268,266	3,629,626	8,938,986	667,371	86,384	467,431								
0130	FEDERAL AND STATE INCOME TAXES	TSFR 7 1280	19,990,911	8,620,523	1,647,120	4,883,149	4,556,897	(175,737)	620,797	(161,836)								
0140	GAINS ON DISPOSITION OF PLANT	NETPLANT	0	0	0	0	0	0	0	0								
0150	TOTAL ELECTRIC OPERATING EXPENSES		480,708,983	239,780,976	29,455,847	54,639,686	138,042,911	10,677,566	2,120,338	5,991,660								
0160	NET ELECTRIC OPERATING INCOME		73,424,204	36,110,610	5,424,005	12,119,901	17,993,379	495,926	1,032,878	247,505								
0170																		
0180	NET ELECTRIC OPERATING INCOME		73,424,204	36,110,610	5,424,005	12,119,901	17,993,379	495,926	1,032,878	247,505								
0190																		
0200	RATE BASE																	
0210	TOTAL ELECTRIC PLANT	TSFR 10 230	2,699,422,995	1,425,019,676	184,416,074	289,667,965	704,699,851	51,774,683	6,850,132	36,994,594								
0220	LESS: ACCUM. PROV. FOR DEPREC	TSFR 10 310	1,211,304,741	638,660,084	81,649,484	130,329,690	322,288,233	24,437,260	3,066,139	10,873,852								
0230	NET PLANT		1,488,118,254	786,359,592	102,766,589	159,338,295	382,411,618	27,337,423	3,783,993	26,120,743								
0240	PLUS:																	
0250	WORKING CAPITAL	TSFR 15 380	46,478,090	20,349,400	2,054,410	5,238,315	17,068,033	1,584,904	178,826	4,202								
0260	PRIOR NET PREPAID PENSION ASSET	SALWAGES	(147,620)	(76,952)	(9,036)	(15,506)	(40,058)	(3,186)	(396)	(2,486)								
0270	PENSION REGULATORY ASSET	SALWAGES	16,297,775	8,495,817	997,640	1,711,894	4,422,525	351,786	43,673	274,441								
0280																		
0290	REG ASSET - DSM PROGRAMS	DEMI	0	0	0	0	0	0	0	0								
0300	REG ASSET - REGULATORY EXPENSE	CLAIMEDREV	0	0	0	0	0	0	0	0								
0310	JANUARY 2002 ICE STORM	DISTPLANT	0	0	0	0	0	0	0	0								
0320	LESS:																	
0330	ACCUM. DEFERRED TAXES	TSFR 8 600	257,387,401	134,697,048	16,764,860	27,846,186	69,232,527	5,216,857	598,852	3,031,071								
0340	DEFERRED GAIN ON EMISSION CR	ENERGY1	36,761,427	16,105,255	1,757,086	4,227,895	13,175,663	1,186,732	176,639	132,157								
0350	DEFERRED GAIN ON SO2 ALLOW-100%	ENERGY1	0	0	0	0	0	0	0	0								
0360	CUST. ADVANCES FOR CONSTRUCTION	DISTPLANT	2,175,074	1,254,640	232,728	229,123	355,409	9,080	6,505	87,390								
0370	CUSTOMER DEPOSITS	CUST121	2,022,444	84,971	1,487,728	279,490	77,369	216	92,670	0								
0380																		
0390	TOTAL RATE BASE		1,255,419,408	664,307,535	85,711,386	134,037,250	322,103,158	22,957,231	3,145,922	23,156,927								
0410	RATE OF RETURN		5.84858%	5.43583%	6.32822%	9.04219%	5.58622%	2.16022%	32.83227%	1.06882%								
0420	RELATIVE RATE OF RETURN		1.00	0.93	1.08	1.55	0.96	0.37	5.61	0.18								
0430																		
0440																		



**KANSAS CITY POWER & LIGHT COMPANY**  
**DOCKET NO.**  
**CLASS COST OF SERVICE FOR KANSAS CUSTOMERS**  
**FOR THE TEST YEAR ENDED DECEMBER 31, 2007**

SCHEDULE 1  
PAGE 2

LINE NO.	DESCRIPTION	ALLOCATION BASIS		KANSAS RETAIL RESIDENTIAL GEN. SERVICE SMALL MEDIUM LARGE LARGE OFF-PEAK OTHER LIGHTING															
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)								
0450	SCHEDULE 1 - SUMMARY AT EQUALIZED CLAIMED RATE OF RETURN																		
0470	RATE BASE																		
0480	TOTAL ELECTRIC PLANT	TSFR 10 230		2,699,422,995	1,425,019,676	184,416,074	289,667,985	704,699,851	51,774,683	6,850,132	36,994,594								
0490	LESS: ACCUM. PROV. FOR DERREC	TSFR 10 310		1,211,304,741	638,660,084	81,649,484	130,329,690	322,288,233	24,437,280	3,066,139	10,873,852								
0500	NET PLANT			1,488,118,254	786,359,592	102,766,589	159,338,295	382,411,618	27,337,423	3,783,993	26,120,743								
0510	ADD: WORKING CAPITAL	TSFR 15 380		46,478,090	20,349,400	2,054,410	5,238,315	17,068,033	1,584,904	178,826	4,202								
0520	PROFORMA CWC	TSFR 16 2160		(0)	(79,307)	11,891	123,812	(24,443)	(24,491)	24,553	(32,014)								
0530	PRIOR NET PREPAID PENSION ASSET	TSFR 1 260		(147,620)	(76,982)	(9,036)	(15,506)	(40,058)	(3,186)	(396)	(2,486)								
0540	PENSION REGULATORY ASSET	TSFR 1 270		16,297,775	8,495,817	997,640	1,711,894	4,422,525	351,786	43,673	274,441								
0550	REG ASSET - DSM PROGRAMS	TSFR 1 290		0	0	0	0	0	0	0	0								
0560	REG ASSET - REGULATORY EXPENSE	TSFR 1 300		0	0	0	0	0	0	0	0								
0580	JANUARY 2002 ICE STORM	TSFR 1 310		0	0	0	0	0	0	0	0								
0590	LESS:																		
0600	ACCUM. DEFERRED TAXES	TSFR 8 600		257,387,401	134,697,048	16,764,860	27,846,186	69,232,527	5,216,857	598,852	3,031,071								
0610	DEFERRED GAIN ON EMISSION CR	TSFR 1 340		36,761,427	16,105,255	1,757,086	4,227,895	13,175,663	1,186,732	176,639	132,157								
0620	CUST. ADVANCES FOR CONSTRUCTION	TSFR 1 360		2,173,074	1,254,640	232,728	229,123	355,409	9,080	6,505	87,590								
0630	CUSTOMER DEPOSITS	TSFR 1 370		2,022,444	84,871	1,487,728	279,490	77,369	216	92,670	0								
0640	TOTAL RATE BASE			1,255,419,408	664,228,227	85,723,276	134,161,062	322,078,715	22,932,740	3,170,475	23,124,913								
0650	OPERATING INCOME @ 5.849% ROR			73,424,204	38,847,917	5,013,594	7,846,517	18,837,030	1,341,240	185,428	1,352,479								
0660	OPERATING EXPENSES																		
0670	FUEL	TSFR 4 3940		101,560,200	44,529,744	4,855,545	11,677,023	36,372,052	3,275,239	486,526	364,072								
0680	PURCHASED POWER	TSFR 4 3950		25,946,066	11,604,235	1,248,522	2,962,201	9,113,999	815,678	114,982	86,448								
0700	OTHER OPERATION & MAINTENANCE EXPENSES	TSFR 4 3960		201,865,909	106,809,531	12,902,554	21,041,941	52,757,705	4,080,456	521,456	3,752,267								
0710	DEPRECIATION EXPENSES	TSFR 5 1420		76,728,912	40,202,661	5,305,525	8,271,986	19,890,841	1,452,304	190,710	1,414,876								
0720	AMORTIZATION EXPENSES	TSFR 5 1650		20,626,074	10,168,165	1,161,714	2,161,242	6,408,969	562,245	96,337	68,402								
0730	INTEREST ON CUSTOMER DEPOSITS	TSFR 1 110		90,512	3,803	66,581	12,508	3,463	10	4,147	0								
0740	TAXES OTHER THAN INCOME TAXES	TSFR 6 560		33,900,399	17,842,315	2,268,266	3,629,626	8,938,986	667,371	86,384	467,431								
0750	PLUS: CHANGE IN TAXES OTHER THAN INCOME TAXES			0	0	0	0	0	0	0	0								
0760	FEDERAL AND STATE INCOME TAXES	TSFR 7 1280		19,990,911	8,620,523	1,647,120	4,883,149	4,556,897	(175,737)	620,797	(161,836)								
0770	PLUS: CHANGE IN FEDERAL AND STATE INCOME TAXES			0	1,459,669	(218,852)	(2,278,782)	449,877	450,764	(451,903)	589,227								
0780	GAINS ON DISPOSITION OF PLANT	TSFR 1 140		0	0	0	0	0	0	0	0								
0790	TOTAL ELECTRIC OPERATING EXPENSES			480,708,983	241,240,645	29,236,995	52,360,904	138,492,788	11,128,329	1,668,436	6,580,887								
0800	COST OF SERVICE																		
0810	LESS: PRESENT OTHER REVENUE			554,133,187	280,088,561	34,250,589	60,207,420	157,329,818	12,469,569	1,853,864	7,933,366								
0820	INCREASE IN 451-MISC SERVICE REVENUE			144,771,440	64,647,544	7,029,728	16,543,552	50,811,539	4,536,304	645,323	557,430								
0830	INCREASE OTHER			0	0	0	0	0	0	0	0								
0840	SALES REVENUE	TSFR 1 930		409,361,747	215,441,017	27,220,861	43,663,869	106,518,259	7,933,264	1,208,541	7,375,936								
0850	TOTAL REVENUE ADJUSTMENT			0	4,196,975	(629,263)	(6,562,166)	1,293,528	1,296,077	(1,299,352)	1,694,201								
0870	PERCENT CHANGE (RATE SCHEDULES)			0.000000%	1.98679%	-2.25946%	-13.04796%	1.22930%	11.59957%	-51.81052%	29.81837%								