

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

DIRECT TESTIMONY OF

LORI A. WRIGHT

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

**IN THE MATTER OF THE APPLICATION OF
KANSAS CITY POWER & LIGHT COMPANY
TO MODIFY ITS TARIFFS TO BEGIN THE
IMPLEMENTATION OF ITS REGULATORY PLAN**

DOCKET NO. 06-KCPE- ____ - ____

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

2 A: My name is Lori A. Wright. My business address is 1201 Walnut, Kansas City, Missouri
3 64106-2124.

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

5 A: I am employed by Kansas City Power & Light Company (“KCPL” or the “Company”) as
6 Controller.

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

8 A: As Controller, I have primary responsibility for management of KCPL’s accounting
9 function, including all accounting records, the design of internal controls and the
10 preparation of financial reports for management and shareholders.

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

2 A: I graduated from The University of Iowa in 1985 with a Bachelor of Business
3 Administration degree in Accounting. I received my Master of Business Administration
4 degree from The University of Iowa in 1989. I am a Certified Public Accountant. I was
5 first employed at KCPL in 2001 as Assistant Controller and became Controller in 2002.
6 From 1990 to 2001, I held various accounting positions at Central and South West and
7 American Electric Power (Central and South West was acquired by American Electric
8 Power in 2000). From 1986 to 1990, I held various accounting positions at Iowa Electric
9 Light and Power Company.

10 **Q: Have you previously testified in a proceeding at the State Corporation Commission**
11 **for the State of Kansas (“KCC” or “Commission”) or before any other utility**
12 **regulatory agency?**

13 A: Yes, I have filed written testimony with the KCC and with the Missouri Public Service
14 Commission (“MPSC”).

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

16 A: The purpose of my testimony is to support the following adjustments listed on the
17 summary of adjustments, which is attached to the direct testimony of KCPL witness
18 Don A. Frerking as Schedule DAF-2 (“Summary of Adjustments”):

<u>Adjustment (“Adj-“)</u>	<u>Description</u>
20 20	Payroll and FICA payroll taxes;
21 21 & 53	Plant in service and reserve for depreciation;
22 27	Pensions;
23 30	Homeland security;
24 31	Demand response, efficiency and affordability programs;

1 32 Regulatory expense;
2 41, 49 & pro forma Bad debt expense;
3 42 Wolf Creek refueling accrual;
4 45 Benefit expense;
5 48 Transmission revenue, and
6 50 Prepayments

7 The dollar amounts discussed in this testimony related to these adjustments refer to total
8 Company effects, not Kansas jurisdictional effects (unless otherwise noted). Kansas
9 effects are determined by allocation factors sponsored by Company witness Don A.
10 Frerking.

11 **I. PAYROLL AND FICA TAXES**

12 **Q: What are the various components of Adj-20?**

13 A: Adj-20 consists of the following parts:

- 14 (a) Annualized payroll costs, fuel: \$5,548,499;
- 15 (b) Reversal of test year payroll costs, fuel: (\$5,220,470);
- 16 (c) Annualized payroll costs, other operations and maintenance (“O&M”)
17 expense: \$158,186,833;
- 18 (d) Reversal of test year payroll costs, other O&M expense: (\$148,834,011);
19 and
- 20 (e) Adjusted FICA payroll taxes: \$495,221.

21 **Q: How were the payroll annualization adjustments determined?**

22 A: The adjustments were calculated as the difference between annualized payroll and payroll
23 recorded in the test period (2005, consisting of nine (9) months actual and three (3)

1 months budget). Annualized payroll costs are included in parts (a) and (c). Payroll costs
2 recorded during the test year are included in parts (b) and (d).

3 **Q: How was payroll annualized?**

4 A: We annualized payroll based on the complement of employees and pay rates expected to
5 be in effect as of September 30, 2006.

6 **Q: How were pay rates determined?**

7 A. Pay rates for bargaining (union) employees were based on contractual agreements. Pay
8 rates for non-bargaining employees were based on annual salary adjustments expected to
9 be in effect March 1, 2006.

10 **Q. Were amounts over and above base pay, such as overtime, premium pay, etc.**
11 **included in the payroll annualization?**

12 A. Yes, amounts for overtime were included at an amount equal to the average of the
13 amounts incurred for the period January 2002 through September 2005. Amounts were
14 included for other categories at levels comparable to those incurred in the test period.

15 **Q. Was payroll expense associated with the Company's interest in the Wolf Creek**
16 **Nuclear Operating Corporation ("WCNOC") annualized in a similar manner?**

17 A. Yes, it was.

18 **Q. Do the payroll annualization adjustments take into consideration payroll billed to**
19 **joint venture partners and payroll charged to capital?**

20 A. Yes, they do.

21 **Q. How was the FICA payroll tax adjustment determined?**

22 A. This adjustment was calculated as the difference between annualized FICA payroll tax
23 expense and FICA payroll tax expense recorded in the test period.

1 **Q. How was FICA payroll tax expense annualized?**

2 A. We annualized FICA payroll tax expense by determining the FICA payroll tax associated
3 with annualized payroll. Our calculation was done at the employee level, with
4 consideration of the 2006 Social Security limit.

5 **Q. Does the FICA payroll tax expense adjustment take into consideration payroll tax
6 expense billed to joint venture partners and payroll tax expense charged to capital?**

7 A. Yes, it does.

8 **II. PLANT IN SERVICE AND RESERVE FOR DEPRECIATION**

9 **Q. What are the various plant-related adjustments?**

10 A. The various plant-related adjustments include:

11	Adj-21- Plant in service	\$ 70,574,000
12	Adj-53a- Reserve for depreciation	\$104,891,359
13	Adj-53b- Retirements and net salvage	(\$ 39,328,000)

14 **Q: How was Adj-21 determined?**

15 A. This adjustment was calculated as the difference between projected December 31, 2005
16 plant balances and estimated plant balances as of September 30, 2006.

17 **Q. How were the September 30, 2006 plant balances estimated?**

18 A. We rolled projected December 31, 2005 plant balances forward by using the Company's
19 2006 capital budget, which has been approved by management and the Company's Board
20 of Directors. We also included anticipated retirements during this period.

21 **Q. Did this adjustment to plant balances include the Wind Turbine addition scheduled
22 for 2006?**

1 A. No, the adjustment for the Wind Turbine is considered separately in Adj-52, which is
2 addressed in the direct testimony of KCPL witness John Grimwade.

3 **Q. What is the purpose of adjustments 53a and 53b?**

4 A. In combination, these adjustments roll forward the reserve for depreciation balances from
5 projected December 31, 2005 to September 30, 2006. The former addresses the
6 depreciation provision component of the reserve, while the latter addresses the retirement
7 and net salvage components.

8 **Q. How were these two adjustments determined?**

9 A. The depreciation provision component was calculated by multiplying the September 2005
10 provision times nine months to approximate the provision that would be charged to the
11 Reserve for Depreciation from January through September 2006. The retirement and net
12 salvage components were based on estimated retirement activity during this period.

13 III. PENSIONS

14 **Q: What are the various components of Adj-27?**

15 A. This adjustment consists of five parts:

16 (a) Adjust Financial Accounting Standard No. 87 "Employers' Accounting for
17 Pensions" ("FAS 87") pension expense for ratemaking purposes to an
18 annualized level:- \$18,293,891;

19 (b) roll forward the FAS 87 regulatory asset to the September 30, 2006 balance:-
20 \$17,653,407;

21 (c) reflect amortization of the FAS 87 regulatory asset:- \$5,197,378;

22 (d) roll forward the net prepaid pension asset:- (\$15,406,298); consisting of
23 (\$6,824,990) Kansas, (\$8,396,432) Missouri and (\$184,876) wholesale; and

1 (e) annualize the Financial Accounting Standard No. 88 “Employers’ Accounting
2 for Settlements and Curtailments of Defined Benefit Pension Plans and for
3 Termination Benefits” (“FAS 88”) expense:- \$77,739.

4 Parts (a), (c) & (e) adjust operating income, and are shown as a combined \$23,569,008 on
5 the Summary of Adjustments. Parts (b) and (d) adjust rate base. Attached as Schedule
6 LAW-1 is a summary of these adjustments.

7 **Q. Do these various adjustments include the effects of the Company’s interest in
8 WCNOC’s pension plans?**

9 A. Yes, they do.

10 **Q. How was part (a) determined?**

11 A. An annualized level of FAS 87 pension expense for ratemaking purposes was
12 determined. Then FAS 87 pension expense recorded during the test year was deducted
13 from the annualized amount.

14 **Q. How was annualized FAS 87 pension expense determined?**

15 A. The annualized FAS 87 expense was based on information provided by the Company’s
16 actuarial firms.

17 **Q. Was annualized FAS 87 pension expense determined in accordance with established
18 regulatory practice?**

19 A. Yes, the calculation was made in accordance with the methodology documented in the
20 Stipulation and Agreement (“Stipulation”) that was recently approved by the Commission
21 in Docket No. 04-KCPE-1025-GIE (the “1025 Docket”) setting forth KCPL’s Regulatory
22 Plan.

23 **Q. What is the purpose of part (b)?**

- 1 A. This adjustment was made to roll forward the FAS 87 regulatory asset to September 30,
2 2006.
- 3 **Q. What is the nature of this regulatory asset?**
- 4 A. This regulatory asset represents the cumulative unamortized difference in FAS 87
5 pension expense for ratemaking purposes (as discussed in part (a) above) and pension
6 expense currently built into rates.
- 7 **Q. How do you know what level of FAS 87 pension costs that rates are built on?**
- 8 A. The parties to the Stipulation established this amount as \$22 million.
- 9 **Q. When is the beginning point for accumulating this difference in FAS 87 pension
10 expense for ratemaking purposes and FAS 87 pension expense currently built into
11 rates?**
- 12 A. The Stipulation specifies the accumulation was to begin January 1, 2005.
- 13 **Q. How was the FAS 87 regulatory asset rolled forward to September 30, 2006?**
- 14 A. The difference between FAS 87 expense for ratemaking purposes per part (a) and FAS 87
15 expense currently built into rates for the nine-month period January 1, 2006 to
16 September 30, 2006 was added to the projected regulatory asset balance at December 31,
17 2005.
- 18 **Q. What is the purpose of part (c)?**
- 19 A. This adjustment is an amortization of the FAS 87 regulatory asset mentioned in the
20 discussion on part (b).
- 21 **Q. Over what period is the FAS 87 regulatory asset amortized?**
- 22 A. The FAS 87 regulatory asset is amortized over a 5-year period, as specified in the
23 Stipulation.

- 1 **Q. What is the purpose of part (d)?**
- 2 A. This adjustment was made to roll forward the net prepaid pension asset to September 30,
3 2006.
- 4 **Q. What is the nature of this asset?**
- 5 A. This asset represents the initial net prepaid pension asset outlined in the Stipulation
6 (\$63,658,444 total company, consisting of \$28,963,526 Kansas and \$34,694,918
7 Missouri) reduced by the difference between pension expense computed under FAS 87
8 (per part (a) above) and contributions made to the pension trusts from January 1, 2005
9 through September 30, 2006.
- 10 **Q. How was the net prepaid pension asset rolled forward to September 30, 2006?**
- 11 A. The difference between FAS 87 expense for ratemaking purposes per part (a) and
12 projected contributions for the nine-month period January 1, 2006 to September 30, 2006
13 was added to the projected December 31, 2005 net prepaid pension asset balance to
14 determine the September 30, 2006 net prepaid pension asset.
- 15 **Q. How was the January 1, 2006 to September 30, 2006 FAS 87 contribution amount
16 determined?**
- 17 A. The contributions are based on the minimum contributions as determined by the
18 Company's actuarial firms.
- 19 **Q. Is the net prepaid pension asset properly includable in rate base?**
- 20 A. Yes, inclusion of this asset in rate base is specified in the Appendix C to the Stipulation
21 that was recently approved by the Commission in the 1025 Docket.
- 22 **Q. What is the purpose of part (e)?**
- 23 A. This adjustment was made to annualize FAS 88 expense.

1 Q. What is FAS 88?

2 A. FAS 88 is a financial accounting standard that addresses, among other issues, accounting
3 for settlements of defined benefit plan obligations and curtailments of defined benefit
4 plans.

5 Q. How was the FAS 88 adjustment determined?

6 A. The adjustment was calculated by taking the difference between annualized FAS 88
7 expense and FAS 88 expense recorded in the test year.

8 Q. How was annualized FAS 88 expense determined?

9 A. The annualized FAS 88 expense is based on information provided by the Company's
10 actuarial firms.

11 IV. HOMELAND SECURITY

12 Q. ** [REDACTED]

13 A. [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 Q. [REDACTED]

20 A. [REDACTED]

21 [REDACTED]

22 Q. [REDACTED]

23 A. [REDACTED]

1 Q. [REDACTED]
2 A. [REDACTED]
3 [REDACTED]
4 Q. [REDACTED]
5 A. [REDACTED]
6 [REDACTED]
7 Q. [REDACTED]
8 [REDACTED]
9 A. [REDACTED]
10 [REDACTED]
11 Q. [REDACTED]
12 A. [REDACTED]
13 [REDACTED]
14 Q. [REDACTED]
15 A. [REDACTED]
16 [REDACTED]**

17 **V. DEMAND RESPONSE, EFFICIENCY AND AFFORDABILITY PROGRAMS**

18 **Q: What are these programs?**
19 A. These programs are described in detail in Appendix B to the Stipulation that was
20 approved in the 1025 Docket, and are to be implemented during the period 2005-2009.
21 Company witness Susan K. Nathan further describes these programs in her direct
22 testimony.
23 **Q. Why are these costs being deferred?**

1 A. In accordance with the Stipulation, the Company established a regulatory asset to
2 accumulate these costs as they are incurred during this five-year period.

3 **Q. What is the purpose of Adj-31?**

4 A. This adjustment has two components, one affecting rate base and the other affecting
5 operating income.

6 **Q. Why is there an adjustment to rate base?**

7 A. In accordance with the Stipulation these program costs are includable in rate base. The
8 adjustments of \$3,042,375 (Kansas programs) and \$3,077,375 (Missouri programs) roll
9 forward the deferred costs to September 30, 2006.

10 **Q. Why is there an adjustment to operating income?**

11 A. The operating income adjustment of \$694,128 provides a full-year amortization of the
12 estimated September 30, 2006 deferred cost balances.

13 **Q. Was amortization addressed in the Stipulation?**

14 A. Yes, the Stipulation specifically states that the 2006 rate case will include an amortization
15 of these deferred customer program costs.

16 **Q. What was the amortization period used in the adjustment?**

17 A. These costs are being amortized over a ten-year period as in the Stipulation.

18 **VI. REGULATORY EXPENSE**

19 **Q. What are Regulatory expenses?**

20 A. While the term typically refers to various federal, state and local costs this adjustment
21 addresses incremental rate case expenses in this case.

22 **Q. What is the purpose of Adj-32?**

1 A. This adjustment has two components, one affecting rate base and the other affecting
2 operating income.

3 **Q. Why is there an adjustment to rate base?**

4 A. Regulatory expense costs are included in rate base and this adjustment of \$2,250,000
5 (\$1,125,000 each for both Kansas and Missouri incremental rate case expenses) rolls
6 forward the deferred costs to September 30, 2006.

7 **Q. Why are these costs being deferred?**

8 A. Rate case expenses are included as a component of revenue requirements.

9 **Q. Why is there an adjustment to operating income?**

10 A. The operating income adjustment of \$1,510,105 provides a full-year amortization of the
11 estimated September 30, 2006 deferred cost balance.

12 **Q. What was the amortization period used in the adjustment?**

13 A. These costs are being amortized over a two-year period. Typically, rate case expenses
14 are amortized over the period during which the revised rates are expected to be in effect.
15 For this case there is some uncertainty as to when rates will again be revised. The
16 Stipulation allows for rate cases to be filed in 2007 and 2008, with a required rate case in
17 2009. Therefore, the revised rates in this case may be in effect for as little as one year, or
18 for as long as four years. A two-year amortization period was chosen as a reasonable
19 mid-point.

20 **VII. BAD DEBT EXPENSE**

21 **Q: What is the purpose of these adjustments?**

22 A. Adj-41 for \$810,030 is an annualization of bad debt expense based on the test year.
23 Adj-49 provides bad debt expense for the following revenue adjustments:

1 Adj-49a Weather and other (\$55,544)

2 Adj-49b Customer growth and other \$45,501

3 The *pro forma* bad debt expense adjustment of \$124,866 shown in Schedule DAF-1 (Sch
4 1, Col 605, line 1-019) attached to the direct testimony of KCPL witness Don A. Frerking
5 reflects the bad debt expense effect of the requested revenue adjustment.

6 **Q. Please explain Adj-41 in more detail.**

7 A. This adjustment represents the difference between annualized bad debt expense and bad
8 debt expense recorded in the test period.

9 **Q. How was annualized bad debt expense determined?**

10 A. Annualized bad debt expense was calculated by applying a bad debt write-off factor to
11 test period revenue.

12 **Q. What bad debt write-off factor was used, and how was the factor determined?**

13 A. We used a bad debt percentage of 0.43%, determined by examining recent net bad-debt
14 write-off experience.

15 **Q. The term “net” write-offs is used. What does it mean?**

16 A. “Net” write-offs refer to the net of accounts written off and recoveries received on
17 accounts previously written off.

18 **Q. Was the bad debt factor used in Adj-41 also used for Adj-49?**

19 A. Yes, the same factor was used.

20 **Q. How was the *pro forma* bad debt expense adjustment determined?**

21 A. This adjustment was calculated as the requested rate adjustment times the bad debt factor.

22 **Q. Why is such an adjustment necessary?**

1 A. It is reasonable to assume that increased revenue resulting from this rate request will
2 result in increased bad debt expense.

3 VIII. WOLF CREEK REFUELING ACCRUAL

4 **Q: What is the Wolf Creek refueling accrual?**

5 A. The Wolf Creek Nuclear Operating Corporation's ("WCNOC's") refueling cycle is
6 normally about 18 months. During the 18 months leading up to a refueling the Company
7 accrues monthly its share of the projected incremental costs to be incurred during the
8 scheduled refueling. Incremental costs include operating, maintenance and replacement
9 power expenses. Changes to or variances from the estimates are recorded when known
10 or are probable.

11 **Q. What is the purpose of Adj-42?**

12 A. This adjustment for \$580,000 (\$224,000 O&M and \$356,000 replacement power)
13 annualizes the Wolf Creek refueling accrual expense by adjusting the test year accrual to
14 an annualized amount.

15 **Q. Why is a refueling accrual adjustment necessary in this case?**

16 A. The test period includes accrued expenses related to the Spring 2005 refueling and the
17 Fall 2006 refueling. Annualized expense should reflect only the next scheduled refueling
18 in the Fall of 2006. The annualization adjustment results in a full year's accrued expense
19 for this upcoming refueling.

20 IX. BENEFIT EXPENSE

21 **Q: What is the purpose of Adj-45?**

22 A. This adjustment for \$2,050,240 is necessary to state benefit expense at a current level.

23 **Q. What types of benefits are included in this category?**

1 A. The more significant benefits include Other Post-Employment Benefits (“OPEB”), 401K
2 company match and medical costs. These three categories in total comprise about 85%
3 of Benefit Expense.

4 **Q. How were the adjustments calculated?**

5 A. The adjustments were calculated as the difference between annualized benefit expense
6 and benefit expense recorded during the test period.

7 **Q. How was the OPEB annualized amount determined?**

8 A. The annualized OPEB expense is based on information provided by the Company’s
9 actuarial firms.

10 **Q. How was the 401K annualized amount determined?**

11 A. We annualized 401K expense by determining the 401K expense associated with
12 annualized payroll (Adj-20), based on the 2005 average matching percentage.

13 **Q. How was annualized medical expense determined?**

14 A. Annualized medical expense was set at the level expected to be in effect during the
15 updated test period.

16 **Q. Were benefit amounts billed to partners and charged to capital considered in these
17 annualization adjustments?**

18 A. Yes, these factors were taken into consideration.

19 **X. TRANSMISSION REVENUE**

20 **Q. What is the purpose of Adj-48?**

21 A. The adjustment for \$1,170,013 is necessary to eliminate non-recurring revenue from the
22 test period.

23 **Q. What is the nature of this revenue?**

1 A. Under an agreement between the Southwest Power Pool (“SPP”) and participating SPP
2 transmission owners, KCPL re-conducted the KCPL LaCygne to Stillwell 345 kV
3 transmission line in 2003 to increase transmission capacity. The agreement provided for
4 the receipt by KCPL of all revenue allocable to the SPP transmission owners associated
5 with point-to-point transmission service reservations that could not have been approved
6 without the upgrade. These incremental revenues were to be received until KCPL
7 recovered its allocable costs. After that point, SPP would revert to the revenue
8 distribution methodology in place before the agreement (i.e., no further incremental
9 revenues).

10 **Q. Why must the 2005 transmission revenues totaling \$1,170,013 be eliminated from**
11 **cost of service?**

12 A. By early 2005, KCPL had recovered its allocable costs and henceforth did not receive
13 further incremental transmission revenues. Therefore, amounts recorded in the test year
14 must be eliminated from cost of service as a non-recurring item.

15 **XI. PREPAYMENTS**

16 **Q: What accounts are included in prepayments?**

17 A. While several types of accounts are included under this category, the more significant
18 relate to prepaid insurance and capacity payments.

19 **Q. What is the purpose of Adj-50?**

20 A. This adjustment for \$7,163,046 is necessary to reflect this rate base item on a 13-month
21 average. Prepayment amounts can vary widely during the course of the year and an
22 averaging method minimizes these fluctuations.

23 **Q. How was the adjustment determined?**

- 1 A. The 13-month average was calculated and compared to the actual prepayment balance at
2 September 30, 2005.
- 3 **Q. What period was used for the 13-month averaging?**
- 4 A. September 2004 through September 2005.
- 5 **Q. Has the Staff used 13-month averaging in prior rate cases, to the best of your
6 knowledge?**
- 7 A. Yes, to the best of my knowledge Staff has consistently used this approach to determine
8 the Prepayment rate base amount.
- 9 **Q: Does this conclude your testimony?**
- 10 A: Yes, it does.

Components of Adj-27, Pensions

(a)	
Annualized FAS 87 pension expense for ratemaking purposes	35,335,237
2005 FAS 87 pension expense for ratemaking purposes	17,041,346
Adjustment	<u>18,293,891</u> (1)
(b)	
FAS 87 regulatory asset @ 9/30/2006	33,213,943
FAS 87 regulatory asset @ 12/31/2005	15,560,536
Adjustment	<u>17,653,407</u>
(c)	
FAS 87 regulatory asset @ 9/30/2006	33,213,943
Amortization period	5
Annualized amortization	<u>6,642,789</u>
Amounts billed to partners and charged to capital	<u>(1,445,411)</u>
Adjustment	<u>5,197,378</u> (1)
(d)	
FAS 87 net prepaid pension asset @ 9/30/2006	24,654,165
FAS 87 net prepaid pension asset @ 12/31/2005	40,060,463
Adjustment	<u>(15,406,298)</u>
(e)	
Annualized FAS 88 pension expense	77,739
2005 FAS 88 pension expense	-
	<u>77,739</u> (1)

(1) The sum of these three components affecting operating income is \$23,569,008