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August 17, 2006

Ms. Susan Duffy
Kansas Corporation Commission
1500 Southwest Arrowhead Road
Topeka, KS 66604

Re: 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
Docket No. 06-KCPE-828-RTS

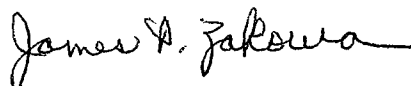
Dear Ms. Duffy:

Please accept for immediate filing in the above-referenced docket, **PREFILED DIRECT TESTIMONY OF COURTNEY CHRISTENSEN ON BEHALF OF THE CITY OF MISSION HILLS, KANSAS and CERTIFICATE OF SERVICE.**

The original and eight copies of the above-described pleadings are being forwarded to you this date, in accordance with Commission regulations. Please return one copy of the pleadings "filed" stamped at your earliest convenience in the enclosed addressed, stamped envelope.

Thank you for your consideration in this matter.

Very truly yours,



James P. Zakoura
for

SMITHYMAN & ZAKOURA, CHARTERED

JPZ:bkf
Enclosures

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

PREFILED DIRECT TESTIMONY OF

COURTNEY CHRISTENSEN

**ON BEHALF OF
THE CITY OF MISSION HILLS, KANSAS**

**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-828-RTS

1 **Q. Would you please state your name, business address and your employment**
2 **responsibility?**

3 A. My name is Courtney Christensen. In calendar year 2000, I was selected as City
4 Administrator of the City of Mission Hills, Kansas.

5 **Q. Please briefly state your work experience, as well as briefly describe your**
6 **education and membership in professional associations.**

7 A. Prior to becoming City Administrator of the City of Mission Hills, Kansas, I was
8 previously employed by the City of Kansas City, Missouri for twelve years, working in
9 the offices of Budget, Systems and Finance, and serving five years in the City
10 Manager's office. I received a Bachelor's degree from Kansas State University and a
11 Master's degree in Public Administration from the University of Missouri-Kansas City.
12 I have served as President of the Greater Kansas City Chapter of the American Society

1 of Public Administrators, and President of University Associates, a community-based
2 group supporting the work of UMKC. I am currently a Board member of the Kansas City
3 Manager's Association.

4 **Q. Please briefly outline your major areas of responsibility as City Administrator.**

5 A. As City Administrator, I am the Chief Administrative Officer of the City. As City
6 Administrator, I have the responsibility to enforce all City Ordinances, Resolutions and
7 contracts; prepare and submit the annual City Budget, the five-year Financial Forecast,
8 and capital improvement program; supervise the improvement of all streets, alleys,
9 sidewalks and public ways; direct the lighting of public grounds and highways; and
10 supervise the management and control of all parks and public grounds. As City
11 Administrator, I would have various other areas of employment responsibility, but would
12 highlight the above described areas of responsibility as they are closely related to the
13 substance of my testimony in this Docket of the State Corporation Commission of the
14 State of Kansas ("KCC").

15 **Q. Please state those areas of interest to the City in this KCC Docket.**

16 A. Certainly, as a ratepayer of the Kansas City Power & Light Company ("KCPL"), the City
17 is very interested in receiving safe, reliable, electric utility service at just and reasonable
18 rates as mandated by Kansas law. Further, the City has a specific interest in service
19 and rates related to KCPL Rate Schedule MOL – Municipal Ornamental Street Lighting
20 Service ("Schedule MOL").

21 **Q. Please describe street lighting issues.**

22 A. Issues related to street lighting are critical to the City of Mission Hills, Kansas as well
23 as other cities throughout the State of Kansas and throughout the United States. Street
24 lighting fulfills a critical public safety function for the residents of the various cities.

1 Since effective street lighting is essential for public safety, many cities have attempted
2 to provide the service in a manner that also enhances the beauty and aesthetics of the
3 city.

4 **Q. Would you please continue.**

5 A. Many cities provide street lighting through a mechanism of tall towers with illuminated
6 lamps, oftentimes referred to as "cobras," because the metal lighting tower structure
7 goes to a substantial height and then bends downward with a lighting fixture attached,
8 thus resembling the physical presence of a cobra. However, many cities throughout the
9 United States have approached street lighting in a different manner, with the metal
10 structures being of less comparative height than traditional street lighting metal
11 structures, and with decorative lamps attached to the comparatively shorter metal street
12 lighting structures. Because the height of these structures is generally much shorter
13 than the taller, cobra type street lighting structures, the shorter, decorative street lighting
14 structures must be more numerous in order to provide the same amount of light.

15 **Q. Would you please relate this street lighting discussion between the City of**
16 **Mission Hills, Kansas and KCPL?**

17 A. Belinder Avenue in the City of Mission Hills requires appropriate lighting for public safety
18 purposes. The City of Mission Hills, along a portion of Belinder Avenue, formerly
19 provided street lighting through nineteen cobra-like structures. The City of Mission Hills
20 discussed with personnel of KCPL a project whereby the nineteen cobra-like structures
21 would be replaced by forty-one decorative street light structures. In 2004, when these
22 discussions took place, KCPL personnel estimated and advised the City of Mission Hills
23 that KCPL would charge approximately \$210 per year for each of such forty-one
24 decorative structures.

1 **Q. Did KCPL install the forty-one decorative streetlights at the price of \$210 per**
2 **year?**

3 A. No. In November of 2004, personnel of KCPL contacted the City of Mission Hills and
4 stated that instead of the advised price of \$210 per year, the price for each of such
5 decorative lights was going to be \$432.24 - \$443.04. KCPL more than doubled the price
6 for each decorative light. For the forty-one decorative light project on Belinder Avenue,
7 the annual price went from \$8,610.00 as previously advised by KCPL, to an amount of
8 \$17,721.00 - \$18,164.64.

9 **Q. Prior to the enormous price increase from KCPL, had the City of Mission Hills,**
10 **Kansas planned additional decorative street lighting to the forty-one decorative**
11 **light project described above?**

12 A. Yes. The City of Mission Hills had planned to replace 300 of the cobra style street lights
13 with approximately 600 of the decorative street light fixtures. However, because of the
14 price charged by KCPL, although the City very much wanted to do the additional six
15 hundred light project, such project was cancelled as being simply too expensive.

16 **Q. Has the City had the opportunity to review what other electric utilities charge for**
17 **decorative street lighting?**

18 A. Yes. We contacted a company named Holofane, that is the manufacturer of the
19 decorative street lights that were installed on Belinder Avenue in the City of Mission
20 Hills, and who was the vendor to KCPL for such equipment. We ascertained from
21 Holofane, the names of several other cities in the United States where identical or very
22 similar Holofane equipment was in use. We contacted several of those cities and
23 learned that the following rates were charged by the electric public utilities in those cities
24 for decorative street lighting;

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DECORATIVE STREET LIGHT COMPARISON

	Mission Hills, Kansas	Keene's Point- Windmere, FL	Ramsey MN	Forest City, NC
Installation & Management	Kansas City Power & Light	Progress Energy	Connexus Energy	Rutherford EMC
Type of Light/Wattage	HPS* 150 Watt	HPS 100 Watt		
Style	Holophane- Arlington	Holophane- Arlington	Standard Decorative	Standard Decorative
Tariff	\$36/light/ month	\$16.17/light/ month	\$5.95-\$15/ light/month	\$7-\$13/ light/month

* HPS - High Pressure Sodium - gives an orange-yellow tinted glow

Q. Because of the very substantial difference in pricing in other cities compared to the pricing of KCPL, did it cause the City concern?

A. Yes. It appears that the price for decorative street lighting is very much overstated as compared to other locations and other electric public utilities.

Q. Has Schedule MOL been reviewed by the Kansas Corporation Commission?

A. Yes. It appears that at the time KCPL was advising the City of Mission Hills that the charge for ornamental light would be \$210.00 per year, it was contending to the KCC that the rate for Schedule MOL should be far higher. In KCC Docket No. 05-KCPE-087-TAR (filed on July 28, 2004), KCPL requested the Commission approve a rate for decorative lighting of \$432.24 - \$443.04. As part of its Application of July 28, 2004, KCPL filed a "Confidential Cash Flow Analysis Associated with Municipal Ornamental

1 Street Light Tariff.” This KCPL Application was not provided to the City of Mission Hills,
2 nor has the City been provided with the Confidential Cash Flow Analysis.

3 **Q. Would you please continue?**

4 A. On September 13, 2004, in KCC Docket No. 05-KCPE-087-TAR, the Staff of the KCC
5 (Mo. Cushinlieny and Mr. Maxwell) sent a Memorandum to the Commission, indicating
6 that Schedule MOL was filed by KCPL in response to a request by the City of Mission
7 Hills. The Staff notes that KCPL presented cost and pricing information to the KCC
8 Staff, and that Staff recommended approval of Schedule MOL rates “so that the rates
9 for standard street lighting customers are not negatively impacted.” The Commission
10 approved Schedule MOL on September 24, 2004, citing in its Order the Staff’s
11 recommendation.

12 **Q. Has Schedule MOL ever been reviewed on a cost-of-service basis by the**
13 **Commission?**

14 A. No.

15 **Q. Although Schedule MOL has been made available to all municipalities in the**
16 **KCPL Kansas service territory, have any municipalities other than the City of**
17 **Mission Hills and its forty-one light project, elected to take service under**
18 **Schedule MOL?**

19 A. No. To me, the reason seems clear. Schedule MOL is priced so high that Kansas cities
20 cannot reasonably afford to elect service thereunder. Representatives of the Cities of
21 Westwood Hills, Prairie Village, and Fairway, Kansas contacted me and indicated that
22 they were seriously considering decorative street lighting. However, when I advised
23 them of KCPL’s rate, these Cities all declined because of the extremely high rate of
24 Schedule MOL.

1 **Q. Did Mission Hills seek to somehow solve this described problem outside of this**
2 **KCC Docket?**

3 A. Yes. We attempted to convince KCPL that our decision to elect decorative street
4 lighting service was in reliance upon the rate quote of \$210 per year. The City also
5 requested KCPL justify the extremely high tariff for Schedule MOL, but KCPL declined.
6 The City also attempted to purchase the decorative street lighting structures from
7 Holofane directly, but were advised by Holofane (the street light vendor) that KCPL
8 objected to such a direct sale.

9 **Q. Is it your opinion that the rates for service under Schedule MOL are unfair, unjust,**
10 **and unreasonable?**

11 A. I would state that the rates for Schedule MOL have never been cost justified. These
12 rates are over twice the amount quoted to the City by KCPL, and are more than twice
13 as much as other utilities charge for what appears to be the same or similar service.
14 Based on these observations and subject to further review of cost of service, it does not
15 appear that the rates of Schedule MOL are just and reasonable. Finally, the tariff is so
16 expensive that KCPL appears to have driven municipalities away from the service.

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Brian J. Moline, Chairman
 Robert Krehbiel, Commissioner
 Michael C. Moffet, Commissioner

In the Matter of the Application of)
Kansas City Power & Light Company)
for Approval to Make Certain Changes) Docket No. 06-KCPE-828-RTS
in Its Charges for Electric Service)
to Begin the Implementation of)
Its Regulatory Plan)

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2006, a true and correct copy of the PREFILED DIRECT TESTIMONY OF COURTNEY CHRISTENSEN ON BEHALF OF THE CITY OF MISSION HILLS, KANSAS was deposited in the United States mail, first-class postage prepaid, addressed to the following:

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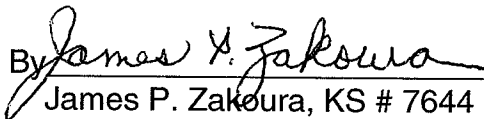
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