

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

REBUTTAL TESTIMONY OF

F. DANA CRAWFORD

**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-828-RTS

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

2 A: My name is F. Dana Crawford. My business address is 1201 Walnut, Kansas City,
3 Missouri 64106.

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

5 A: I am employed by Kansas City Power & Light Company (“KCPL”) as Vice
6 President, Plant Operations.

7 **Q: Are you the same F. Dana Crawford who pre-filed direct testimony in this case?**

8 A: Yes, I am.

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

10 A: In this testimony, I will rebut the testimony of Citizens’ Utility Ratepayers Board
11 (“CURB”) witness Ms. Andrea C. Crane concerning maintenance expense
12 adjustments with respect to the Hawthorn Unit 5 (“H5”) turbine overhaul cycle.

13 **Q: Explain your exception to Ms. Crane’s normalization of the H5 turbine overhaul
14 costs?**

1 A: KCPL assumed a six-year cycle between turbine overhauls. As explained in my
2 direct testimony, H5 will be moving to “sectionalized” turbine overhauls that will
3 include three separate maintenance periods over the six-year cycle; one every two
4 years. The H5 turbine will be maintained in three “sections,” HP/IP section, LP
5 sections, and generator. KCPL’s normalization adjustment looked at a four-year
6 cycle including two turbine overhaul “sections” through 2010. Each “sectional”
7 overhaul varies greatly in cost. KCPL’s adjustment was \$1,125,000 using two
8 “sectionalized” outages averaged over a four-year period with the first outage
9 estimated at \$1.5 million and the second at \$3.0 million. Ms. Crane applies a two-
10 year turbine overhaul cycle and uses only one of the “sectionalized” overhauls. With
11 a two-year cycle, Ms. Crane proposes an adjustment of \$750,000. Since each
12 “sectionalized” overhaul varies greatly in cost, using two overhauls averaged over a
13 four-year period is more representative of an average “sectionalized” overhaul cost
14 than using one overhaul over a two-year period as proposed by Ms. Crane. I
15 recommend the Commission reject CURB’s adjustment.

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

17 A: Yes, it does.

