BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

The Office of the Public Counsel and The Midwest Energy Consumers Group,

Complainants,

۷.

KCP&L Greater Missouri Operations Company

Respondent.

CERTIFIED MAIL

NOTICE OF COMPLAINT

Issue Date: January 2, 2019

Effective Date: January 2, 2019

On December 28, 2018, the Office of the Public Counsel and the Midwest Energy Consumers Group (MECG) filed a petition with the Missouri Public Service Commission asking the Commission to issue an accounting authority order requiring KCP&L Greater Missouri Operations Company (GMO) to defer to a regulatory liability account all revenues associated with non-existent costs and return on investments associated with certain Sibley generation units that are being retired by GMO. The Commission is treating that petition as a complaint against GMO. Pursuant to Commission Rule 4 CSR 240-2.070, GMO has 30 days from the date of this notice to file an answer. Since this notice is being issued on January 2, 2019, the answer is due no later than February 1, 2019.

Provisions governing procedures before the Commission are found in Commission Rule 4 CSR 240, Chapter 2. In particular, the procedures relating to discovery are found at Commission Rule 4 CSR 240-2.090.

File No. EC-2019-0200

THE COMMISSION ORDERS THAT:

1. The Commission's Data Center shall send, by certified mail, a copy of this notice

and order and a copy of the complaint to the Respondent at:

1200 Main Street Kansas City, MO 64105

2. The Respondent shall file its answer to this complaint no later than

February 1, 2019. All pleadings shall be mailed to:

Secretary of the Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102-0360,

or shall be filed using the Commission's electronic filing and information service.

3. This order shall be effective when issued.



BY THE COMMISSION

Corris I Woodruff

Morris L. Woodruff Secretary

Morris L. Woodruff, Chief Regulatory Law Judge, by delegation of authority pursuant to Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri, on this 2nd day of January, 2019.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Petition for an Order directing) KCP&L Greater Missouri Operations Company to) Record in a Regulatory Liability its Benefits from) Certain Avoided Costs and Foregone Revenues) Due to its Election to Prematurely Retire the Sibley) Generation Units.)

Case No. EU-2019-XXXX

PETITION FOR AN ACCOUNTING ORDER

COME NOW the Office of the Public Counsel (OPC or Public Counsel), and the Midwest Energy Consumers Group (MECG), (Collectively "the Petitioners) by and through their respective counsel, and request that the Public Service Commission (Commission) issue an accounting order under subdivisions (4) and (8) of section 393.140, RSMo. The Petitioners state as follows:

Background

1. KCP&L Greater Missouri Operations Company (GMO) is an electrical corporation engaged in the generation, transmission, and sale of electricity within Missouri, primarily serving the western half of the state.

2. GMO's income for the fiscal year ending June 30, 2018, as shown in the Commission Staff's True-up Accounting Schedule in its most recent rate case is \$160,169,593.¹

3. At the time of that true-up, GMO's generation portfolio included Sibley units $1,^2 2$,

3, and common plant. All of the Sibley units used steam generation.

¹ Staff True Up Accounting Schedules, Case No. ER-2018-0146 Accounting Schedule 1 (Sept. 4, 2018). ² The Petitioners recognize that Sibley 1 was retired on June 1, 2017, with the exception of the boiler used for Sibley 3. *Exhibit 113, Direct Testimony of Burton Crawford*, Case No. ER-2018-0146 (January 30, 2018). The Petitioners include Sibley 1 in this application because costs associated with Sibley 1 were used to determine GMO's rates in ER-2018-0146.

4. GMO requested a rate increase this year in Case Nos. ER-2018-0146. That case was resolved via Commission approved stipulations on October 31, 2018. The resolution of those cases approved rates that include the operation and maintenance costs, return on any investment, property taxes, and other sums associated with the Sibley units. The new rates became effective December 6, 2018.

5. The operation and maintenance costs alone for Sibley generation units 1, 2, 3, and common plant amount to over \$27 million annually.³ Annual depreciation expense for the Sibley units is \$10.4 million.⁴ The amount of property, payroll, and other Sibley related tax payments are not available at this time; and the Petitioners recognize that other heretofore unrecognized costs may also be associated with the Sibley units and common plant.

6. Press releases on January 20, 2015, June 2, 2017, and August 1, 2018, from both the Kansas City Power & Light Company and GMO announce the impending retirement of Sibley. The President and Chief Executive Officer of Evergy, Inc., GMO's parent company, declared that the Sibley generation units are planned to be retired by the end of 2018 during the Third Quarter Earnings Conference Call for investors on November 8, 2018.

7. Absent some action by the Commission, GMO's ratepayers will continue to pay rates that include nonexistent expenses attributed to these units.

Parties

- 8. Public Counsel and the MECG are the petitioners.
- Public Counsel's address is Governor Office Building, P.O. Box 2230, 200 Madison Street,
 Suite 650 Jefferson City, Missouri 65102. Public Counsel is a Missouri state agency within

³ Response to OPC Data Request 8562, Case no. ER-2018-0146 (Aug. 17, 2018).

⁴ Staff True Up Accounting Schedules, Case No. ER-2018-0146 Accounting Schedule 5 (Sept. 4, 2018).

the Department of Economic Development, and is directed by Section 386.710, RSMo to "represent and protect the interests of the public" before the Commission.

- 10. MECG's address is 308 E. High Street, Jefferson City, Missouri 65101. MECG is an incorporated entity formed to represent the interests of large commercial and industrial users of gas, electricity and water in the state of Missouri. In this regard, MECG has been granted intervention in numerous GMO rate proceedings.
- GMO is the respondent. GMO is a Delaware corporation with its principle office and place of business at 1200 Main Street Kansas City, Missouri 64105. GMO's fictitious name registration was filed in Case No. EN-2009-0015.
- The Staff of the Public Service Commission (Staff) is a party by rule 4 CSR 240-2.010(10).
 Staff's address is Governor Office Building, P.O. Box 360, 200 Madison Street Jefferson City, Missouri 65102.
- 13. The OPC directly contacted GMO's representatives before initiating this petition. The conversations did not absolve the necessity of this filing.

Jurisdiction

14. GMO is a an "electrical corporation" and "public utility" as defined by Section 386.020, RSMo, and is hence subject to the Commission's jurisdiction. This Commission has exclusive jurisdiction to hear and determine petitions against public utilities for matters within the Commission's jurisdiction and purview.

Petition for an Accounting Order

15. The Petitioners request that the Commission order GMO to defer to a regulatory liability account all revenues associated with non-existent costs and return on Sibley investments associated with GMO's Sibley generation units 1, 2, 3, and common plant that were included in the revenue requirement used to set rates.

16. Missouri courts endorse the Commission creating regulatory deferrals to account for extraordinary costs and events.⁵ The Missouri Court of Appeals has held that regulatory deferrals for extraordinary events are not retroactive ratemaking, and thus authorized them outside of a general rate case proceeding.⁶ Indeed, the Sibley units now owned by GMO have previously been the subject of accounting orders to capitalize capital improvement costs,⁷ and to defer reconstruction and coal conversion costs.⁸

17. Along with the Missouri Courts, the Uniform System of Accounts also endorses the utilization of deferral accounting for extraordinary events. In fact, Commission rules provide that Missouri electrical corporations shall use the Uniform System of Accounts Prescribed for Public Utilities and Licensees.⁹

18. The General Instructions for the Uniform System of Accounts explains that an electrical utility's income should reflect profits and losses during the test period of the most recent general rate case, and that those:

"[I]tems related to the effects of events and transactions which have occurred during the current period and which are of *unusual nature* and *infrequent occurrence* shall be

⁵ E.g., State ex rel. Mo. Gas Energy v. Pub. Serv. Comm'n, 210 S.W.3d 330, 335-36 (Mo. App. W.D. 2006); Mo. Gas Energy v. Pub. Serv. Comm'n, 978 S.W.2d 434, 438 (Mo. App. W.D. 1998).

⁶ See Mo. Gas Energy, 210 S.W.3d at 336.

⁷ State ex rel. Aquila, Inc. v. Pub. Serv. Comm'n, 326 S.W.3d 20, 27 (Mo. App. W.D. 2010).

⁸ State ex rel. Mo. Off. Of Pub. Counsel v. Pub. Serv. Comm'n, 858 S.W.2d 806, 808 (Mo. App. W.D. 1993).

⁹ 4 CSR 240-20.030.

considered extraordinary items. Accordingly, they will be events and transactions of *significant effect which are abnormal and significantly different from the ordinary and typical activities of the company, and which would not reasonably be expected to recur in the foreseeable future*. ... To be considered as extraordinary under the above guidelines, an item should be more than approximately 5 percent of income, computed before extraordinary items...¹⁰

19. Electric utilities may then account for the associated costs of "extraordinary items" in the Uniform System of Accounts number 254, which is specifically designated for regulatory liabilities.¹¹ What amounts may be allocated to Account 254 will come from various other accounts, but the failure to identify every account in this petition does not foreclose any inclusion of costs within the requested regulatory liability.¹²

20. The retirement of a generation facility will also implicate accumulated deferred taxes, either protected or unprotected, and the return on the Sibley investments, which GMO will have to identify and account for in a regulatory liability account.

21. The premature retirement of the Sibley generation units is an extraordinary event within the scope of Missouri case law as well as the Uniform System of Accounts. Indeed, the

¹⁰ 18 CFR Part 101 (1993) (emphasis added).

¹¹ *Id*.

¹² Within the Uniform System of Accounts, electric utilities record depreciation expense in Account 403. Account 414 addresses revenues and expense incurred in the operation of an electric plant. Accounts 500, 502, 505, 506, 507, 510, 511, 512, 513, and 514 address the operation and maintenance costs of steam power generation. Sibley's electrical energy generation is steam based. Account 557 speaks to miscellaneous charges from the purchase of electricity. Accounts 920 and 921 catalogue administrative costs. Accounts 924 and 925 address property insurance injuries to the utility's property. Account 926 involves employee pension and benefits, and Account 930 records miscellaneous general expenses. All of these accounts, and potentially more, document the costs and revenues associated with generating electricity at Sibley. The loss of Sibley thereby implicates at least these accounts. The loss of Sibley also possibly implicates the recordings in Accounts 408.1 and 408.2 regarding taxes other than income; 440 through 451, 456, and 457 regarding the sale of electricity; and 560 through 574 regarding operation and maintenance expenses related to transmission.

retirement of the Sibley units is of an unusual nature and infrequent occurrence justifying an accounting order.

22. The premature retirement of the Sibley units is unusual because electric utilities do not retire generating units regularly or frequently. The Commission and Court of Appeals previously determined that costs to *renovate* the Sibley units were subject to an accounting deferral because that activity was "unusual and not recurring."¹³ Renovating generation units occurs more frequently than retiring the unit altogether, which occurs only once. Therefore, the premature retirement of the Sibley units is unusual.

23. The premature retirement of the Sibley units is also unusual due to the circumstances underlying its currently ordered rates. The Commission set the current rates for GMO in Case No. ER-2018-0146 assuming that the Sibley units would remain operational during the subject rates effective period. Consequentially GMO's ratepayers will be paying for non-existent expenses, while at the same time no longer benefitting from Sibley's revenues. Such a result for ratepayers is beyond the norm, and warrants accounting thereof.

24. The premature retirement of the Sibley units also represents an infrequent occurrence because it is a one-time occurrence. The test period used to determine GMO's rates did not contemplate repeated or common retirements of generation units. The test period also did not take into account the change in costs or savings from such retirements. Rather, the test period presumed such events would not occur when setting GMO's future rates.

25. Sibley units 1, 2, 3, and common plant costs constitute over five percent of GMO's income. As indicated, while Sibley costs are roughly \$23 million annually, GMO's annual income is \$160.17 million. Therefore, dividing Sibley's operations and maintenance costs into GMO's

¹³ *Pub. Serv. Comm'n*, 858 S.W.2d at 811

income alone accounts for approximately 17% of GMO's income. That said, however, the specific amount of property, payroll, and other taxes associated with Sibley are not ascertainable at this time. However, those numbers combined with operations and maintenance and depreciation expense, clearly impact more than five percent of GMO's income.

26. The Petitioners have attached further justification for their Application hereto in the form of the affidavits of OPC witnesses John A. Robinett and Robert E. Schallenberg.

27. The request for an accounting order does not preclude future arguments regarding the prudency of GMO's decision to retire Sibley and relinquish its associated revenues from selling generation into the SPP Integrated Marketplace.

28. The OPC, GMO, and Staff met on several occasions recently to discuss the retirement of Sibley. On December 20, 2018, OPC counsel advised GMO counsel of the intention to file this Petition, and the two parties discussed the Petition again on December 26, 2018. Those discussions were unsuccessful in resolving this matter.

WHEREFORE, the Petitioners pray that the Commission order GMO to record as a regulatory liability in Account 254 the revenue and the return on the Sibley unit investments collected in rates for non-fuel operation and maintenance costs, taxes including accumulated deferred income taxes, and all other costs associated with Sibley units 1, 2, 3, and common plant. The Petitioners are not asking for an accounting order addressing depreciation expense as the Commission has already approved a stipulation requiring GMO to record it as a regulatory liability.

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

<u>/s/ Caleb Hall</u> <u>/s/ Marc Poston</u> Caleb Hall, #68112

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Marc Poston, #45722 200 Madison Street, Suite 650 Jefferson City, MO 65102 P: (573) 751-4857 F: (573) 751-5562 <u>Caleb.hall@ded.mo.gov</u> <u>Marc.poston@ded.mo.gov</u>

Attorneys for the Office of the Public Counsel

MIDWEST ENERGY CONSUMERS GROUP

/s/__David Woodsmall David L. Woodsmall, MBE #40747 308 East High Street, Suite 204 Jefferson City, Missouri 65101 P: (573) 636-6006 F: (573) 636-6007 david.woodsmall@woodsmalllaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 28th day of December, 2018, with notice of the same being sent to all counsel of record.

/s/ Caleb Hall

Exhibit No.: Issue(s):

Accounting Order

Witness/Type of Exhibit: Sponsoring Party: Case No.: Robinett/Affidavit Public Counsel EU-2019-XXXX

AFFIDAVIT

OF

JOHN A. ROBINETT

Submitted on Behalf of the Office of the Public Counsel

KCP&L GREATER MISSOURI OPERATIONS COMPANY

Case No. EU-2019-XXXX

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Denotes Information that has been redacted

December 28, 2018



BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

AFFIDAVIT OF JOHN A. ROBINETT

STATEOFMISSOURI)

SS.

COUNTY OF COLE)

COMES NOW JOHN A. ROBINETT and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *PETITION FOR AN ACCOUNTING ORDER*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

John A. Robinett Utility Engineering Specialist

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 28th day December, 2018.



TIFFANY HILDEBRAND My Commission Expires August 9, 2019 Cole County Commission #15637121

Hildebrand Tiffan

Notary Public

My Commission expires August 9, 2019.

- 1. My name is John A. Robinett.
- 2. I am employed by the Missouri Office of the Public Counsel ("OPC") as a Utility Engineering Specialist.
- 3. I previously provided testimony before the Missouri Public Service Commission, both as a witness for Commission Staff and as a witness for OPC. My work and educational experience, and background are attached to this affidavit as Schedule JAR-1.
- 4. This affidavit provides factual support for OPC's request that the Commission order KCP&L Greater Missouri Operations Company (GMO) to record in a regulatory liability account certain expenses that GMO will no longer incur after it prematurely retires its Sibley generating station (generating units and common plant). The Commission relied upon those Sibley related expenses when determining GMO's revenue requirement used for setting GMO's new rates, which took effect December 6, 2018.
- 5. In 2018, I informed the Commission through my testimony for OPC in Case Nos. ER-2018-0145 and ER-2018-0146 that Kansas City Power & Light Company ("KCPL") and GMO had announced the retirements of Montrose Units 2, 3, and common plant in December of 2018; Sibley units 1, 2, 3, and common plant in December of 2018; and Lake Road unit 4/6 in December of 2019. Attached are my previous testimonies as Schedules JAR-2 direct testimony, JAR-3 rebuttal testimony, and JAR-4 surrebuttal and true-up direct testimony. The rebuttal testimony indicates Sibley unit 1 was retired in June of 2017; I should note that while Sibley unit 1 was no longer being used for power production, the boiler system from unit 1 continues to be used to provide steam for unit 3.
- 6. Depreciation expense in GMO's revenue requirement used for setting GMO's general rates in Case No. ER-2018-0146 is approximately \$10.3 million annually based on the true-up accounting schedules of Staff; however, because the Commission ordered GMO in Case No. ER-2018-0146 to track that expense upon the retirement of Sibley unit 3 until the effective date of new rates in GMO's next general rate case, OPC is not requesting the Commission order GMO to accrue depreciation expense in the regulatory liability account.

Exhibit No.: Issue(s): Witness/Type of Exhibit:

Accounting Order Schallenberg/Affidavit

Sponsoring Party: Case No.: Public Counsel EU-2019-XXX

AFFIDAVIT

OF

ROBERT E. SCHALLENBERG

Submitted on Behalf of the Office of the Public Counsel

KCP&L GREATER MISSOURI OPERATIONS COMPANY

Case No. EU-2019-XXXX

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

AFFIDAVIT OF ROBERT E. SCHALLENBERG

STATEOFMISSOURI

SS.

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COUNTY OF COLE)

COMES NOW ROBERT E. SCHALLENBERG and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *PETITION FOR AN ACCOUNTING ORDER*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Robert E. Schallenberg Director of Policy

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 28th day December, 2018.



TIFFANY HILDEBRAND My Commission Expires August 9, 2019 Cole County Commission #15637121

Tiffany Hildebrand Notary Public

My Commission expires August 9, 2019.

- 1. My name is Robert E. Schallenberg.
- 2. I am employed by the Missouri Office of the Public Counsel ("OPC") as Director of Policy.
- 3. I previously provided testimony before the Missouri Public Service Commission (Commission) both as a member of Commission Staff and at OPC. My work and educational experience and background is attached to this affidavit as Schedule RES 1.
- 4. Beginning in 1977, I have been continually involved in the development of utility cost of service, utility accounting, reconciliations thereto, and the impacts specific events have on a company's cost of service. I began my career with the Commission performing Fuel Adjustment Clause ("FAC") audits on behalf of the Commission staff. During Case No. ER-2018-0146 I worked with Mr. John Robinett and other members of OPC regarding the timing of the Sibley 3 retirement, new rates, and the impact of these items on the recovery of the retirement costs on customer rates.
- 5. In GMO's last general electric rate case, Case No. ER-2018-0146, GMO's cost of service the Commission used to establish GMO's customer rates included the costs and revenue margins of GMO's Sibley generating units which were operational throughout the test year as updated and trued-up.
- 6. When the retirement of Sibley generating units 2 and 3, along with the unit 1 boiler and common plant occurs, GMO will experience cost reductions from the expense levels included in GMO's new rates. The new rates included expense levels consistent with these units being in operation. GMO's shareholder will benefit at the expense of GMO's captive retail customers. GMO's shareholder will receive through retail customer rates the full benefit of the reduction in Sibley generation units' expense without absorbing any of the fuel cost increase created when GMO's Southwest Power Pool margin revenues from the Sibley plants are eliminated. These increased fuel costs will be passed through to GMO's customers through its FAC as FAC charges will be higher (or less negative) than they otherwise would be.
- 7. Without setting new general rates or granting the requested Accounting Order, Missouri's regulatory scheme, in part through the FAC, will give GMO's shareholder an economic benefit that exceeds the actual expense reduction due to retiring of the Sibley units.

CASE PROCEEDING PARTICIPATION ROBERT E. SCHALLENBERG

COMPANY

CASE NO.

Spire Missouri (Six Cases)	GO-2016-0332
KCP&L Greater Missouri Operations Company	ER-2018-0146
Kansas City Power & Light Company	ER-2018-0145
Grain Belt Express Clean Line, LLC	EA-2016-0358
Spire, Inc. EnergySouth, Inc.	GM-2016-0342
Great Plains Energy, Inc. Westar Energy, Inc.	EM-2016-0324
Kansas City Power & Light Company	ER-2016-0285
The Empire District Electric Company, Liberty Utilities (Central) Co. and Liberty Sub Corp.	EM-2016-0213
Laclede Gas Company	GF-2015-0181
The Empire District Electric Company	AO-2012-0062
KCP&L Greater Missouri Operations Company	ER-2010-0356
Kansas City Power & Light Company	ER-2010-0355
Great Plains Energy Incorporated, Kansas City Power & Light Company	ER-2009-0090
Great Plains Energy Incorporated, Kansas City Power & Light Company	ER-2009-0089
Great Plains Energy Incorporated, Kansas City Power & Light Company, Aquila, Inc.	EM-2007-0374
Union Electric Company, d/b/a AmerenUE	ER-2007-0002
Missouri Pipeline Company	GC-2006-0491
Aquila, Inc.	ER-2005-0436
Union Electric Company, d/b/a AmerenUE	EA-2005-0180
Union Electric Company, d/b/a AmerenUE	EC-2002-1
Mississippi River Transmission	RP96-199-000
Williams Natural Gas Company	RP96-173-000

CASE PROCEEDING PARTICIPATION

ROBERT E. SCHALLENBERG

Williams Natural Gas Company	RP95-136-000
Williams Natural Gas Company	RP94-365-000
Laclede Gas Company	GR-94-220
Western Resources	GM-94-40
COMPANY	CASE NO.
Western Resources	GR-93-240
St. Joseph Light & Power Company	ER-93-41
Southwestern Bell Telephone Company	TC-93-224
St. Joseph Light & Power Company	EC-92-214
Kansas Power & Light Company	GR-91-291
Kansas Power & Light Company	EM-91-213
Arkansas Power & Light Company	EM-91-29
Missouri Public Service Company	ER-90-101
Southwestern Bell Telephone Company	TR-90-98
General Telephone	TR-89-182
Southwestern Bell Telephone Company	TO-89-56
Southwestern Bell Telephone Company	TC-89-14
Union Electric Company	EC-87-114
General Telephone	TC-87-57
General Telephone	TM-87-19
General Telephone	TR-86-148
Southwestern Bell Telephone Company	TR-86-84
Kansas City Power & Light Company	EO-85-185
Kansas City Power & Light Company	ER-85-128
Southwestern Bell Telephone Company	TR-83-253
Kansas City Power & Light Company	ER-83-49
Southwestern Bell Telephone Company	TR-82-199
Kansas City Power & Light Company	HR-82-67

CASE PROCEEDING PARTICIPATION ROBERT E. SCHALLENBERG

ER-82-66
TO-82-3
TR-81-208
ER-81-42
CASE NO.
TR-80-256
TR-80-235
ER-80-204
ER-80-48
ER-80-48
TR-79-213
GR-79-114
ER-79-60
ER-79-61
ER-78-252
GR-78-30
ER-78-29
GR-78-70
ER-77-118

Spire Missouri Case No. GO-2016-0332; GO-2016-0333; GO-2017-0201; GO-2017-0202: GO-2018-0309: GO-2018-0310 Date: August 2018 Areas: Cost Recovery Mechanism/ISRS

Kansas City Power & Light Company & KCP&L Greater Missouri Operations Case No. ER-2018-0145 & ER-2018-0146 Date: June, 2018 – Direct; July 2018 – Rebuttal; September, 2018-Surrebuttal & True-up Direct Areas: Policy/Productivity/Affiliate Transactions/Capital Structure/True-up

Grain Belt Express Clean Line, LLC Case No. EA-2016-0358 Date: January 24, 2017 (Rebuttal Report) Areas: Public Comments

Spire, Incorporated EnergySouth, Inc. Case No. GM-2016-0342 Date: September 1, 2016 (Investigation Report) Areas: Affiliated Transactions

Great Plains Energy Incorporated
Westar Energy, Inc.
Case No. EM-2016-0324
Date: July 25, 2016 (Investigation Report)
Areas: Affiliated Transactions

Kansas City Power & Light Company Case No. ER-2016-0285 Date: January 27, 2017 (Surrebuttal) Areas: Affiliate Transactions

The Empire District Electric Company, Liberty Utilities (Central) Co. and Liberty Sub Corp. Case No. EM-2016-0213 Date: July 20, 2016 (Rebuttal) Areas: Affiliated Transactions

Laclede Gas Company Case No. GF-2015-0181 Date: June 18, 2015 (Affidavit) Areas: Finance Authority

The Empire District Electric Company Case No. AO-2012-0062 September 9, 2016 (Direct) Date: Affiliated Transactions: Cost Allocation Manual Areas: KCP&L Greater Missouri Operations Company Case No. ER-2010-0356 Date: November 4, 2010 (Report) Construction Audit and Prudence Review Areas: Kansas City Power & Light Company Case No. ER-2010-0355 Date: November 4, 2010 (Report) Construction Audit and Prudence Review Areas: Great Plains Energy Incorporated, Kansas City Power & Light Company Case No. ER-2009-0090 Date: April 9, 2009 (Surrebuttal) Iatan Prudence Review Areas: Great Plains Energy Incorporated, Kansas City Power & Light Company Case No. ER-2009-0089 April 7, 2009 (Surrebuttal) Date: Iatan Prudence Review Areas: Great Plains Energy Incorporated, Kansas City Power & Light Company, Aquila, Inc. Case No. EM-2007-0374 Date: October 12, 2007 (Rebuttal and Staff Report of Evaluation and Recommendations) GPE Acquisition of Aquila Areas: Union Electric Company, d/b/a AmerenUE Case No. ER-2007-0002 February 28, 2007 (Surrebuttal) Date: Areas: EEInc. January 31, 2007 (Rebuttal) Date: EEInc. and 4 CSR 240-10.020 Areas:

> Schedule RES-1 Page 5 of 9

Missouri Pipeline Company
Case No. GC-2006-0491 Date: September 6, 2006 (Direct)
November 17, 2006 (Surrebuttal)
Areas: Affiliate Transactions, Tariff Violations and Associated Penalties; Transportation Tariffs
Aquila, Inc.
Case No. ER-2005-0436
Date: October, 14 2005 (Direct) December 13, 2005 (Surrebuttal)
Areas: Unit Ownership Costs
Union Electric Company, d/b/a AmerenUE
Case No. EA-2005-0180
Date: October 15, 2005 (Rebuttal)
Areas: East Transfer
Union Electric Company d/b/a AmerenUE
Case No. EC-2002-1
Date:June 24, 2002 (Surrebuttal)Area:Overview, 4 CSR 240-10.020, Alternative Regulation Plan
Laclede Gas Company
Case No. GR-94-220
Date: July 1, 1994 (Direct)
Areas: Property Taxes, Manufactured Gas Accruals, Deregulated Cost Assignments
Western Resources, Inc.,
dba Gas Service, a Western Resources Company
Case No. GM-94-40 Deter November 20, 1002 (Debuttel)
Date:November 29, 1993 (Rebuttal)Areas:Jurisdictional Consequences of the Sale of Missouri Gas Properties
Kansas Power & Light Company
Case No. EM-91-213
Date: April 15, 1991 (Rebuttal)
Areas: Purchase of Kansas Gas & Electric Company
Arkansas Power & Light Company and Union Electric Company
Case No. EM-91-29
Date: 1990-1991 Areas: No pre-filed rebuttal testimony by Staff before non-unanimous stipulation
Areas: No pre-filed rebuttal testimony by Staff before non-unanimous stipulation and agreement reached.

General Telephone Company of the Midwest Case No. TM-87-19

Date: December 17, 1986

Areas: Merger

Union Electric Company

Case No. EC-87-114

Date: September 9, 1987 (Surrebuttal)

Date: April 24, 1987 (Direct)

Areas: Elimination of Further Company Phase-In Increases, Write-Off of Callaway I to Company's Capital Structure

General Telephone Company of the Midwest

Case No. TC-87-57

Date: December 22, 1986

Areas: Background and Overview, GTE Service Corporation, Merger Adjustment, Adjustments to Income Statement

Southwestern Bell Telephone Company

Case No. TR-86-84

Date: 1986

No prefiled direct testimony by Staff - case settled before Staff direct testimony filed.

Kansas City Power & Light Company

Case Nos. EO-85-185 and ER-85-128

- Date: April 11, 1985
- Areas: Phase I Electric Jurisdictional Allocations
- Date: June 21, 1985
- Areas: Phase III Deferred Taxes Offset to Rate Base

Date: July 3, 1985

Areas: Phase IV - 47% vs. 41.5% Ownership, Interest, Phase-In, Test Year/True-Up, Decision to Build Wolf Creek, Non-Wolf Creek Depreciation Rates, Depreciation Reserve

Southwestern Bell Telephone Company

Case No. TR-83-253

Date: September 23, 1983

Areas: Cost of Divestiture Relating to AT&T Communications, Test Year, True-Up, Management Efficiency and Economy

Kansas City Power & Light Company

Case No. ER-83-49

- Date: February 11, 1983
- Areas: Test Year, Fuel Inventories, Other O&M Expense Adjustment, Attrition Adjustment,

Fuel Expense-Forecasted Fuel Prices, Deferred Taxes Offset to Rate Base

Kansas City Power & Light Company

Case Nos. ER-82-66 and HR-82-67

Date: March 26, 1982

Areas: Indexing/Attrition, Normalization vs. Flow-Through, Deferred Taxes as an Offset to Rate Base, Annualization of Amortization of Deferred Income Taxes, Cost of Money/Rate of Return, Allocations, Fuel Inventories, Iatan AFDC Associated with AEC Sale, Forecasted Coal and Natural Gas Prices, Allowance for Known and Measurable Changes

Southwestern Bell Telephone Company

Case No. TR-82-199

Date: August 27, 1982

Areas: License Contract, Capitalized Property Taxes, Normalization vs. Flow-Through, Interest Expense, Separations, Consent Decree, Capital Structure Relationship

Generic Telecommunications

Straight Line Equal Life Group and Remaining Life Depreciation Methods

Case No. TO-82-3

Date: December 23, 1981

Areas: Depreciation

Southwestern Bell Telephone Company

Case No. TR-81-208

Date: August 6, 1981

Areas: License Contract, Flow-Through vs. Normalization

Kansas City Power & Light Company

Case No. ER-81-42

Date: March 13, 1981

Areas: Iatan (AEC Sale), Normalization vs. Flow-Through, Allocations, Allowance for Known and Measurable Changes

Southwestern Bell Telephone Company

Case No. TR-80-256

Date: October 23, 1980

Areas: Flow-Through vs. Normalization

United Telephone Company of Missouri Case No. TR-80-235

Date: December 1980

Areas: Rate of Return

Kansas City Power & Light Company
Case Nos. ER-80-48 and ER-80-204
Date: March 11, 1980
Areas: Iatan Station Excess Capacity, Interest Synchronization, Allocations

Southwestern Bell Telephone Company Case No. TR-79-213

Date: October 19, 1979

Areas: Income Taxes, Deferred Taxes

Gas Service Company

Case No. GR-79-114

Date: June 15, 1979

Areas: Deferred Taxes as an Offset to Rate Base

Missouri Public Service Company

Case Nos. ER-79-60 and GR-79-61

Date: April 9, 1979

Areas: Depreciation Reserve, Cash Working Capital

Missouri Public Service Company

Case Nos. ER-78-29 and GR-78-30

Date: August 10, 1978

Areas: Fuel Expense, Electric Materials and Supplies, Electric and Gas Prepayments, Electric and Gas Cash Working Capital, Electric Revenues

While in the employ of the Kansas State Corporation Commission in 1978, Mr. Schallenberg worked on a Gas Service Company rate case and rate cases of various electric cooperatives.

John A. Robinett

I am employed as a Utility Engineering Specialist for The Missouri Office of the Public Counsel (OPC). I began employment with OPC in August of 2016. In May of 2008, I graduated from the University of Missouri-Rolla (now Missouri University of Science and Technology) with a Bachelor of Science degree in Mechanical Engineering.

During my time as an undergraduate, I was employed as an engineering intern for the Missouri Department of Transportation (MoDOT) in their Central Laboratory located in Jefferson City, Missouri for three consecutive summers. During my time with MoDOT, I performed various qualification tests on materials for the Soil, Aggregate, and General Materials sections. A list of duties and tests performed are below:

- Compressive strength testing of 4" and 6" concrete cylinders and fracture analysis
- Graduations of soil, aggregate, and reflective glass beads
- Sample preparations of soil, aggregate, concrete, and steel
- Flat and elongated testing of aggregate
- Micro-deval and LA testing of aggregate
- Bend testing of welded wire and rebar
- Tensile testing of welded, braided cable, and rebar
- Hardness testing of fasteners (plain black and galvanized washers, nuts, and bolts)
- Proof loading and tensile testing of bolts
- Sample collection from active road constructions sites
- Set up and performed the initial testing on a new piece of equipment called a Linear Traverse / Image Analysis
- Wrote operators manual for the Linear Traverse / Image Analysis Machine
- Trained a fulltime employee on how to operate the machine prior to my return to school
- Assisted in batching concrete mixes for testing, mixing the concrete, slump cone testing, percent air testing, and specimen molding of cylinders and beams

Upon graduation, I accepted a position as an Engineer I in the Product Evaluation Group for Hughes Christensen Company, a division of Baker Hughes, Inc. (Baker), an oil field service company. During my employment with Baker, I performed failure analysis on oil field drill bits as well as composed findings reports which were forwarded to the field engineers in order for them to report to the company the conclusions of the failure causes.

I previously was employed as a Utility Engineering Specialist I, II, III for the Missouri Public Service Commission (Commission). My employment with the Commission spanned from April of 2010 to August of 2016. My duties involved analyzing deprecation rates and studies for utility companies and presenting expert testimony in rate cases before the Commission.

Listed below are the cases in which I have supplied testimony, comments, and/or depreciation rates accompanied by a signed affidavit.

Company	Case Number	Issue	Party
Ameren Missouri	EA-2018-0202	Surrebuttal Testimony Depreciation Life	Office of the Public Counsel (OPC)
Spire Missouri East Spire Missouri West	GO-2018-0309 GO-2018-0310	Direct and Live Rebuttal Testimony ISRS	OPC
Kansas City Power & Light Company	ER-2018-0145	Direct and Rebuttal, Surrebuttal, and True- up direct Testimony, Depreciation and O&M expense related to retired generation units, ONE CIS Allocation	OPC
Kansas City Power & Light Company Greater Missouri Operations	ER-2018-0146	Direct and Rebuttal, Surrebuttal, and True- up direct Testimony, Depreciation and O&M expense related to retired generation units, ONE CIS Allocation, Removal of Additional Amortization	OPC
Empire District Electric Company	EO-2018-0092	Rebuttal, Surrebuttal, Affidavit in Opposition, additional Affidavit and Live Testimony	OPC
Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities	GR-2018-0013	Rebuttal and Surrebuttal Testimony depreciation, general plant amortization	OPC
Laclede Gas Company Missouri Gas Energy Spire Missouri East Spire Missouri West	GO-2016-0332 GO-2016-0333 GO-2017-0201 GO-2017-0202 GR-2017-0215 GR-2017-0216	ISRS Over collection of depreciation expense and ROE based on Western District Opinion Docket No. WD80544	OPC

Company	Case Number	Issue	Party
Gascony Water Company, Inc.	WR-2017-0343	Rebuttal, Surrebuttal, and Live Testimony rate base, depreciation NARUC USoA Class designation	OPC
Missouri American Water Company	WR-2017-0285	Direct, Rebuttal, Surrebuttal, and Live Testimony depreciation, ami, negative reserve, Lead Line	OPC
Indian Hills Utility Operating Company, Inc.	WR-2017-0259	Direct, Rebuttal, Surrebuttal, and Live Testimony Rate Base (extension of electric service, leak repairs)	OPC
Laclede Gas Company Missouri Gas Energy	GR-2017-0215 GR-2017-0216	Direct, Rebuttal, Surrebuttal, True-up Rebuttal, and Live Testimony depreciation, retirement work in progress, combined heat and power, ISRS	OPC
Empire District Electric Company	EO-2018-0048	IRP Special issues	OPC
Kansas City Power & Light Company	EO-2018-0046	IRP Special issues	OPC
Kansas City Power & Light Company Greater Missouri Operations	EO-2018-0045	IRP Special issues	OPC
Kansas City Power & Light Company Greater Missouri Operations	EO-2017-0230	2017 IRP annual update comments	OPC
Empire District Electric Company	EO-2017-0065	Direct, Rebuttal, Surrebuttal, and Live Testimony FAC Prudence Review Heat Rate	OPC
Ameren Missouri	ER-2016-0179	Direct, Rebuttal, Testimony Heat Rate Testing &Depreciation	OPC

Company	Case Number	Issue	Party
Kansas City Power & Light Company	ER-2016-0285	Direct, Rebuttal, Surrebuttal, and Live Testimony Heat Rate Testing &Depreciation	OPC
Empire District Electric Company Merger with Liberty	EM-2016-0213	Rebuttal Testimony	Missouri Public Service Commission (MOPSC)
Empire District Electric Company	ER-2016-0023	Depreciation Study, Direct, Rebuttal, and Surrebuttal Testimony	MOPSC
Hillcrest Utility Operating Company, Inc.	SR-2016-0065	Depreciation Review	MOPSC
Hillcrest Utility Operating Company, Inc.	WR-2016-0064	Depreciation Review	MOPSC
Missouri American Water Company	WR-2015-0301	Depreciation Study, Direct, Rebuttal, and Surrebuttal Testimony	MOPSC
Bilyeu Ridge Water Company, LLC Midland Water Company, Inc. Moore Bend Water Utility, LLC Riverfork Water Company Taney County Water, LLC Valley Woods Utility, LLC(Water) Valley Woods Utility, LLC(Sewer)	WR-2015-0192 WR-2015-0193 WR-2015-0194 WR-2015-0195 WR-2015-0196 WR-2015-0197 SR-2015-0198	Depreciation Review *filed depreciation rates not accompanied	MOPSC
Consolidated into Ozark International, Inc.	Consolidated into WR-2015-0192	by signed affidavit	
I. H. Utilities, Inc. sale to Indian Hills Utility Operating Company, Inc.	WO-2016-0045	Depreciation Rate Adoption CCN	MOPSC
Missouri American Water Company CCN City of Arnold	SA-2015-0150	Depreciation Rate Adoption CCN	MOPSC
Empire District Electric Company	ER-2014-0351	Direct, Rebuttal, and Surrebuttal Testimony	MOPSC
West 16th Street Sewer Company, W.P.C. Sewer Company, Village Water and Sewer Company, Inc. and Raccoon Creek Utility Operating Company, Inc.	SM-2015-0014	Depreciation Rate Adoption	MOPSC

Company	Case Number	Issue	Party
Brandco Investments LLC and Hillcrest Utility Operating Company, Inc.	WO-2014-0340	Depreciation Rate Adoption, Rebuttal Testimony	MOPSC
Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities	GR-2014-0152	Direct, Rebuttal, Surrebuttal and Live Testimony	MOPSC
Summit Natural Gas of Missouri, Inc	GR-2014-0086	Depreciation Study, Direct and Rebuttal Testimony	MOPSC
P.C.B., Inc.	SR-2014-0068	Depreciation Review	MOPSC
M.P.B., Inc.	SR-2014-0067	Depreciation Review	MOPSC
Roy-L Utilities	WR-2013-0543	Depreciation Review	MOPSC
Roy-L Utilities	SR-2013-0544	Depreciation Review	MOPSC
Missouri Gas Energy Division of Laclede Gas Company	GR-2014-0007	Depreciation Study, Direct and Rebuttal Testimony	MOPSC
Central Rivers Wastewater Utility, Inc.	SA-2014-00005	Depreciation Rate Adoption	MOPSC
Empire District Electric Company	ER-2012-0345	Depreciation Study, Direct, Rebuttal, and Surrebuttal Testimony	MOPSC
Empire District Electric Company	WR-2012-0300	Depreciation Review	MOPSC
Laclede Gas Company	GO-2012-0363	Depreciation Authority Order Rebuttal, Surrebuttal and Live Testimony	MOPSC
Moore Bend Water Company, Inc. sale to Moore Bend Water Utility, LLC (Water)	WM-2012-0335	Depreciation Rate Adoption	MOPSC
Oakbrier Water Company, Inc.	WR-2012-0267	Depreciation Review	MOPSC
Lakeland Heights Water Co., Inc.	WR-2012-0266	Depreciation Review	MOPSC
R.D. Sewer Co., L.L.C.	SR-2012-0263	Depreciation Review	MOPSC
Canyon Treatment Facility, LLC	SA-2010-0219	Depreciation Rate Adoption- CCN	MOPSC
Taney County Water, LLC	WR-2012-0163	Depreciation Review	MOPSC
Sale of Saddlebrooke Water and Sewer Infrastructure, LLC to Missouri American Water Company (Sewer)	SA-2012-0067	Rebuttal Testimony	MOPSC

Company	Case Number	Issue	Party
Sale of Saddlebrooke Water and Sewer Infrastructure, LLC to Missouri American Water Company (Water)	WA-2012-0066	Rebuttal Testimony	MOPSC
Midland Water Company, Inc.	WR-2012-0031	Depreciation Review	MOPSC
Sale of KMB Utility Corporation to Algonquin Water Resources of Missouri, LLC, d/b/a Liberty Water (Sewer)	SO-2011-0351	Depreciation Rate Adoption	MOPSC
Sale of KMB Utility Corporation to Algonquin Water Resources of Missouri, LLC, d/b/a Liberty Water (Water)	WO-2011-0350	Depreciation Rate Adoption	MOPSC
Sale of Noel Water Company, Inc. to Algonquin Water Resources of Missouri, LLC, d/b/a Liberty Water (Water)	WO-2011-0328	Depreciation Rate Adoption	MOPSC
Sale of Taney County Utilities Corporation to Taney County Water, LLC (Water)	WM-2011-0143	Depreciation Rate Adoption	MOPSC
Empire District Electric Company	ER-2011-0004	Depreciation Study, Direct, Rebuttal, and Surrebuttal Testimony	MOPSC
Rex Deffenderfer Enterprises, Inc.	WR-2011-0056	Depreciation Review	MOPSC
Tri-States Utility, Inc	WR-2011-0037	Depreciation Review	MOPSC
Southern Missouri Gas Company, L.P.	GE-2011-0096	Depreciation Study Waiver	MOPSC
Southern Missouri Gas Company, L.P.	GR-2010-0347	Depreciation Review	MOPSC
KMB Utility Corporation (Sewer)	SR-2010-0346	Depreciation Review	MOPSC
KMB Utility Corporation (Water)	WR-2010-0345	Depreciation Review	MOPSC
Middlefork Water Company	WR-2010-0309	Depreciation Review	MOPSC

Exhibit No.: Issue(s):

Witness/Type of Exhibit: Sponsoring Party: Case No.: Depreciation/ Retirements/ One CIS Robinett/Direct Public Counsel ER-2018-0145 and ER-2018-0146

DIRECT TESTIMONY

OF

JOHN A. ROBINETT

Submitted on Behalf of the Office of the Public Counsel

KANSAS CITY POWER & LIGHT COMPANY and KCP&L GREATER MISSOURI OPERATIONS COMPANY

Case No. ER-2018-0145 and ER-2018-0146

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Denotes Information that has been redacted

June 19, 2018



BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power &)	
Light Company's Request for Authority)	File No. ER-2018-0145
to Implement a General Rate Increase)	
for Electric Service)	
In the Matter of KCP&L Greater Missouri)	
Operations Company's Request for)	File No. ER-2018-0146
Authority to Implement a General)	
Rate Increase for Electric Service)	

) ss

)

AFFIDAVIT OF JOHN A. ROBINETT

STATE OF MISSOURI

COUNTY OF COLE

John A. Robinett, of lawful age and being first duly sworn, deposes and states:

1. My name is John A. Robinett. I am a Utility Engineering Specialist for the Office of the Public Counsel.

2. Attached hereto and made a part hereof for all purposes is my direct testimony.

3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

John A. Robinett Utility Engineering Specialist

Subscribed and sworn to me this 19th day of June 2018.



JERENE A. BUCKMAN My Commission Expires August 23, 2021 Cole County Commission #13754037

wa

Jerene A. Buckman Notary Public

My Commission expires August 23, 2021.

Schedule JAR-2

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DIRECT TESTIMONY OF JOHN A. ROBINETT KANSAS CITY POWER AND LIGHT COMPANY

KCP&L - GREATER MISSOURI OPERATIONS COMPANY

CASE Nos. ER-2018-0145 and ER-2018-0146

1	Q.	What is your name and what is your business address?
2	A.	John A. Robinett, PO Box 2230, Jefferson City, Missouri 65102.
3	Q.	By whom are you employed and in what capacity?
4	A.	I am employed by the Missouri Office of the Public Counsel ("OPC") as a Utility Engineering
5		Specialist.
6	Q.	Have you previously provided testimony before the Missouri Public Service
7		Commission?
8	A.	Yes.
9	Q.	What is your work and educational background?
10	A.	A copy of my work and educational experience is attached to this testimony as Schedule
11		JAR-D-1.
12	Q.	What is the purpose of your direct testimony?
12 13	Q. A.	What is the purpose of your direct testimony? The purpose of this testimony is to address the expenses related to the known retirements
13		The purpose of this testimony is to address the expenses related to the known retirements
13 14		The purpose of this testimony is to address the expenses related to the known retirements of Kansas City Power & Light Company ("KCPL") Montrose units 2 and 3, and KCP&L
13 14 15		The purpose of this testimony is to address the expenses related to the known retirements of Kansas City Power & Light Company ("KCPL") Montrose units 2 and 3, and KCP&L Greater Missouri Operations Company ("GMO") Sibley units 1, 2, and 3 in December of
13 14 15 16	А.	The purpose of this testimony is to address the expenses related to the known retirements of Kansas City Power & Light Company ("KCPL") Montrose units 2 and 3, and KCP&L Greater Missouri Operations Company ("GMO") Sibley units 1, 2, and 3 in December of 2018 and the retirement of GMO Lake Road unit 4/6 by December of 2019.
13 14 15 16 17	А. Q .	The purpose of this testimony is to address the expenses related to the known retirements of Kansas City Power & Light Company ("KCPL") Montrose units 2 and 3, and KCP&L Greater Missouri Operations Company ("GMO") Sibley units 1, 2, and 3 in December of 2018 and the retirement of GMO Lake Road unit 4/6 by December of 2019. Would you briefly summarize OPC's recommendations provided in your testimony?
13 14 15 16 17 18	А. Q .	The purpose of this testimony is to address the expenses related to the known retirements of Kansas City Power & Light Company ("KCPL") Montrose units 2 and 3, and KCP&L Greater Missouri Operations Company ("GMO") Sibley units 1, 2, and 3 in December of 2018 and the retirement of GMO Lake Road unit 4/6 by December of 2019. Would you briefly summarize OPC's recommendations provided in your testimony? OPC recommends that all of the costs associated with the retirements of KCPL's Montrose
13 14 15 16 17 18 19	А. Q .	The purpose of this testimony is to address the expenses related to the known retirements of Kansas City Power & Light Company ("KCPL") Montrose units 2 and 3, and KCP&L Greater Missouri Operations Company ("GMO") Sibley units 1, 2, and 3 in December of 2018 and the retirement of GMO Lake Road unit 4/6 by December of 2019. Would you briefly summarize OPC's recommendations provided in your testimony? OPC recommends that all of the costs associated with the retirements of KCPL's Montrose units 2, 3, and Montrose common plant, and GMO's Sibley units 1, 2, 3, and Sibley
13 14 15 16 17 18 19 20	А. Q .	 The purpose of this testimony is to address the expenses related to the known retirements of Kansas City Power & Light Company ("KCPL") Montrose units 2 and 3, and KCP&L Greater Missouri Operations Company ("GMO") Sibley units 1, 2, and 3 in December of 2018 and the retirement of GMO Lake Road unit 4/6 by December of 2019. Would you briefly summarize OPC's recommendations provided in your testimony? OPC recommends that all of the costs associated with the retirements of KCPL's Montrose units 2, 3, and Montrose common plant, and GMO's Sibley units 1, 2, 3, and Sibley common plant not be included in the respective utility's cost of service used for setting
13 14 15 16 17 18 19 20 21	А. Q .	The purpose of this testimony is to address the expenses related to the known retirements of Kansas City Power & Light Company ("KCPL") Montrose units 2 and 3, and KCP&L Greater Missouri Operations Company ("GMO") Sibley units 1, 2, and 3 in December of 2018 and the retirement of GMO Lake Road unit 4/6 by December of 2019. Would you briefly summarize OPC's recommendations provided in your testimony? OPC recommends that all of the costs associated with the retirements of KCPL's Montrose units 2, 3, and Montrose common plant, and GMO's Sibley units 1, 2, 3, and Sibley common plant not be included in the respective utility's cost of service used for setting rates, as each of these units will be retired by end of 2018. The estimated reserve shortfall

Direct Testimony of John A. Robinett Case No. ER-2018-0145 ER-2018-0146

\$7.2 million additional amortization related to depreciation expense for GMO created in GMO's last general electric rate case. OPC recommends a decrease in depreciation expense for KCPL related to the Montrose retirements of \$3,139,379 based on depreciation expense of true-up accounting schedules from Case No. ER-2016-0285. OPC recommends a decrease in depreciation expense for GMO related to the Sibley retirements of \$9,875,199 based on depreciation expense of direct accounting schedules from Case No. ER-2016-0285. OPC recommends that all operations and maintenance expenses for KCPL's Montrose and GMO's Sibley facilities not be included in their respective costs of service used for setting rates in these cases.

Coal Unit Retirements

Q. Have KCPL and GMO announced they are retiring coal units in 2018 and 2019?

A. Yes. Attached as Schedule JAR-D-2 is a January 20, 2015, press release from KCP&L announcing the plan to cease burning coal at three power plant locations (Montrose, Sibley, and Lake Road). Also attached as Schedule JAR-D-3 is a June 2, 2017, press release from KCP&L announcing the retirement of six units (Montrose Units 2 and 3, Sibley Units 1, 2, and 3, and Lake Road Unit 4/6) at three power plant locations. Additionally KCPL in response to OPC data request 8508 stated, "[In] the 2017 KCP&L Annual Update filed on June 1, 2017 under MPSC Case No. EO-2017-0229, it was stated that Montrose Units 2 and 3 would be retired 'by 2019.' In the 2017 GMO Annual Update file on June 1, 2017 under MPSC Case No. EO-2017-0230, it was stated that Sibley Units 2 and 3 would be retired 'by 2019.' In the 2017 GMO Annual Update file on June 1, 2017 under MPSC Case No. EO-2017-0230, it was stated that Sibley Units 2 and 3 would be retired 'by 2019.' In the 2017 GMO Annual Update file on June 1, 2017 under MPSC Case No. EO-2017-0230, it was stated that Sibley Units 2 and 3 would be retired 'by 2019.' In the 2017 GMO Annual Update file on June 1, 2017 under MPSC Case No. EO-2017-0230, it was stated that Sibley Units 2 and 3 would be retired 'by 2019' and Lake Road 4/6 retiring 'by 2020.'''

22 Q. Does OPC have concerns with any of these announced coal unit retirements?

A. Yes. In the last rate case ER-2016-0285, the retirement dates for Montrose units 2 and 3 were 2021. In Case No. ER-2016-0156, the Sibley 1 and 2 retirement dates were 2019; likewise, the estimated retirement of Lake Road unit 4/6 was 2020. OPC recognizes that these plants have reached the end of their useful life and is not concerned with KCP&L's announcement of their retirements at the ends of 2018 and 2019.

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However, OPC does have concerns that the premature retirement of GMO's Sibley unit 3 could be imprudent. GMO did not raise the retirement of Sibley 3 in this case. However, the implications of the announced early retirement date of December 2018 for this plant should be addressed in this case. Sibley Unit 3 provides the most energy of all of GMO's generating units. In addition, the retirement of Sibley Unit 3 creates a large depreciation reserve deficiency, since GMO's depreciation rates were set in the 2016 rate case to collect original cost plus net salvage for Sibley unit 3 over the remaining life based on GMO's estimated then retirement date of 2040. OPC expressed its concerns regarding the premature retirement of this generating unit in *Public Counsel's Suggested Special Contemporary Resource Planning Issues* in Case No. EO-2018-0045. In that filing OPC articulated its concerns as follows:

In short, if the company's modeling suggests retiring significant amounts of generation prematurely is prudent; it is likely that other SPP members' modeling will show similar results. Under that scenario, a near-term future where excess SPP reserve margins, resulting in a low cost energy market, are erased entirely appears plausible.

OPC's filing and the memo attached to that filing is contained in its entirety as Schedule JAR-D-4 to this testimony.

Why is KCP&L's announced retirement date for Sibley unit 3 a premature retirement? 19 **Q**. In Case No. ER-2009-0090, GMO was seeking recovery of Selective Catalytic Reduction 20 Α. ("SCR") equipment GMO was installing on Sibley unit 3 to comply with the Clean Air 21 Interstate Rule and the Clean Air Mercury Rule. Based on my review, the depreciation 22 study performed in Case No. ER-2010-0356 did not contain data related to the SCR for 23 Sibley 3 as it was not declared to be in service until first quarter of 2009, and the study 24 only included historical data through December 31, 2008. As part of its 2010 rate case, 25 Case No. ER-2010-0356, GMO filed a depreciation study that indicated the useful life for 26 Sibley 3 was until 2030. The Depreciation study performed in Case No. ER-2016-0156 is 27 the first study to examine Sibley 3 after the SCR was in service, and in that case the life of 28 29 the unit was extended from 2030 to 2040. In this case, based on GMO's announced

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retirement date, the useful life of the unit as of the time of this testimony is a little over six
 months.

Q. Will GMO have adequate generation capacity after it retires Sibley units 1, 2, and 3 in December of 2018?

A. No. Attached as Schedule JAR-D-5 is the Southwestern Power Pool ("SPP") 2017 Resource Adequacy Report published June 19, 2017. Page 28 is the Demand and Capacity report for GMO. This report shows that GMO will be deficient of the SPP target planning capacity for 2019 after the Sibley units are retired at the end of 2018.

Q. Did the SPP make a presentation to the Commission in 2017 which indicated that GMO would not satisfy SPP's Capacity margin requirements in 2019 through 2022?

A. Yes. On August 30, 2017, MISO and SPP both gave presentation during agenda in the large hearing room. The Commission asked several question about the following slide that indicated that GMO was not projected to meet the resource adequacy requirement of SPP in 2019 through 2022:

Final Report – Ju	une 2017
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Load Responsible Entity		Met Resource Adequacy Requirement					
	2017	2018	2019	2020	2021	2022	
Carthage Water & Electric Plant	NO	NO	NO	NO	NO	NC	
City of Malden Board of Public Works	YES	YES	YES	YES	YES	YES	
City of Poplar Bluff Municipal Utilities	YES	YES	YES	YES	YES	YES	
City of West Plains Board of Public Works	YES	YES	YES	YES	YES	YES	
City Utilities of Springfield	YES	YES	YES	YES	YES	YES	
Empire District Electric Company	YES	YES	YES	YES	YES	YES	
Greater Missouri Operations Company (KCP&L)	YES	YES	NO	NO	NO	NC	
Independence Power & Light	YES	YES	YES	YES	YES	YES	
Kansas City Power & Light	YES	YES	YES	YES	YES	YES	
Kennett Board of Public Works	YES	YES	YES	YES	YES	YES	
Missouri Joint Municipal Electric Utility Commission	YES	YES	YES	YES	YES	YES	
People's Electric Cooperative	YES	YES	YES	YES	YES	YES	
Westar Energy	YES	YES	YES	YES	YES	YES	

OPC has transcribed the dialog related to the previous slide that occurred during the agenda presentation by SPP:

Time of transcript start: 1:35:56

Sam Loudenslager: ...Even if you've got somebody who likes like they're won't be able to meet this year's resource requirement at some point in the future I wouldn't be too concerned about it. There's plenty of time for things to get- for things to happen. For resources to be procured.

Chairman Hall: Well, could you- could you explain or give some background for KCP&L GMO in 2019, the projection is that they won't make that requirement?

¹ <u>https://psc.mo.gov/CMSInternetData/8-30-</u> 17%202017%20Resource%20Adequacy%20Process%20Final%20Report.pdf

1 2	Loudenslager: No. I don't know why that is frankly, but it is – I can't tell you. I don't know.
3 4	Chairman Hall: But you're not – You would anticipate them being able to meet it?
5	Loudenslager: Oh yeah. Yeah.
6 7	Chairman Hall: Yeah I would too. So I was a little surprised to see that. I was surprised to see that.
8 9 10	Loudenslager: And I think that is all I haveOh, we will do a post-season analysis also, and this will determine whether or not there is any sort of – What would we call that thing?
11 12	Chairman Hall: You can find the name of a system report [inaudible] or a report type thing.
13 14 15 16 17 18 19 20	Loudenslager: Yeah. Anyway if there is some sort of assessment that is going to – financial assessment that will need to be made, that will show up. Basically, "here's what you told us you were going to. Here's the resources and the demand you anticipated when you submitted your workbooks to us." We published a report in June that said "Yep. This is what everybody says." In October I believe it is that is we will do an analysis and see okay how did everybody do? Did they meet what they said they were going to meet or not?
21	Unknown: I think KCP&L wants to answer your question.
22	Chairman Hall: Oh. Okay.
23	Loudenslager: Hey Denise.
24	Denise Buffington: Good morning.
25	Chairman Hall: Morning.
26 27 28	Buffington: So on behalf of KCP&L and GMO I do not know why the numbers reflect we won't meet our resource requirement in 2019, but I assure you that we have the numbers and we will meet it.
29	Chairman Hall: *laughs*
30 31	Buffington: I don't know what's in that chart. I haven't seen the numbers. But, you know, we do resource planning and submit those

1 2		requirements here at the Commission on an annual basis, and we are prepared to meet those requirements.
2		prepared to meet mose requirements.
3		Chairman Hall: Oh. Okay. I am not nervous about it. I'll put it that way.
4		Buffington: I'm nervous about it.
5 6		Chairman Hall: Well, I was surprised with this calculation. I am not nervous about the company's ability to meet the requirement.
7		Buffington: Thank you.
8		Loudenslager: Any other questions before I move into my last
9		Chairman Hall: I guess not.
10		End of transcript: 1:38:59
11		Currently, GMO does not own enough capacity to meet its own retail load requirements.
12		For 2018, it ** ** With the retirement
13		of Sibley 3, GMO will need additional capacity beyond its 2018 capacity contract. GMO
14		has issued several capacity RFPs to get capacity commitments from other utilities in the
15		SPP market to meet the needs of its customers, at the time of this testimony OPC still has
16		pending discovery related to capacity RFPs and agreed to contracts to purchase capacity.
17	Q.	Is OPC concerned about GMO meeting its requirements?
18	А.	Yes.
19	Q.	So, GMO is prematurely retiring Sibley 3 and then seeking to contract for replacement
20		capacity and energy?
21	A.	Yes and no. GMO is entering into a contract for capacity. However, it has told OPC that it
22		intends to meet the energy needs of its customers by buying energy from the SPP markets.
23	Q.	Does GMO's plan to rely on the SPP energy markets to serve its retail customers cause
24		OPC concern?

² Case No. ER-2018-0146, Staff Data Request No. 0065

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A. Yes. In GMO's work papers for this rate case GMO's fuel run showed that it was purchasing energy from the SPP market to meet almost 38% of its native load's energy requirements. With the retirement of Sibley Units 1, 2, and 3, GMO will increase the percentage purchased from the SPP market focusing on reliance on the market than its own generation. This is more disconcerting in that GMO is the one electric utility in our state that has experienced increases load growth, recently it was publicly announced that a new steel facility (Nucor) is going to open in Sedalia, which is in GMO's service territory.

Q. Why is it a problem for GMO to rely so heavily on the SPP market for energy?

A. OPC realizes that there is enough excess capacity in SPP to reliably provide sufficient energy in the SPP markets to serve GMO's customers. However, by depending on the SPP markets for energy, GMO is subjecting its customers to the fluctuations and risks of those markets.

Q. Is GMO asking for both the costs of Sibley and the contract it is planning to use to replace Sibley 3 capacity be included in its revenue requirement used to set rates in this case?

No. It is only asking for the costs of the plant. However, any changes in GMO's energy costs 15 A. 16 will flow to GMO's customers through its Fuel Adjustment Clause ("FAC"), increasing, or decreasing, the FAC charges on their bills from what they otherwise would be. After rates are 17 effective for this case, GMO's customers, after the end of 2018, will be continuing to pay 18 depreciation expense for three units that will no longer be used or useful. In addition, when 19 the PPA agreement wind comes in-service rate payers will be asked to pay for PPA energy 20 purchases being flowed through the FAC, since they will not be included in the fuel base for 21 22 this case.

23 Q. What is KCPL requesting for its Montrose units that concerns OPC?

A. KCPL is seeking as part of its case continued depreciation expense for Montrose Units 2
and 3, even though it has announced plans to retire both of these units by the end of 2018.
KCPL seeks depreciation expense for these units that will be retired by the end of 2018 to
be collected in rates for up to four years during which the units will be retired and not used.
Additionally, in its rate case KCPL seeks to build in operating expense, fuel expense for

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the units to be collected over the next four years. Make no mistake, this case is aboutbeneficial regulatory lag for KCPL related to building in expenses for generating units thatKCPL has announced will be retired after the true-up period ends in its case.

Q. What is GMO requesting for its Sibley and Lake Road units that concerns OPC?

A. GMO is seeking to as part of its case continued depreciation expense for Sibley Units 1, 2, and 3, even though it has announced plans to retire the units by these end of 2018. GMO seeks to collect this depreciation expense in rates for up to four years during which the units will be retired and not used. GMO is also seeking continued depreciation expense for Lake Road unit 4/6 which it will retire by the end of 2019. GMO is seeking for that depreciation expense to be collected in rates for up to four years, three years of which the units will be retired and not be used. Additionally, in its rate case GMO seeks to build in operating and fuel expense for the units, also to be collected over the next four years. Make no mistake, this case is about beneficial regulatory lag for GMO related to building into its rates expenses for generating units that GMO has announced will be retired shortly after the end of the true-up period in its case.

16 **Q.** Does OPC have other concerns with GMO retiring Sibley unit 3?

Yes. GMO decided to shut down its coal unit that, in the Staff work papers from Case No. 17 A. ER-2016-0156, produced the most energy of all of GMO's units during the test year in that 18 case. Additionally, Sibley, based on Staff's fuel run work papers from the 2016 rate case, 19 is a cheaper unit to run than its jointly-owned Jeffery units. Of its coal resources, GMO's 20 only coal units that are cheaper to run than Sibley unit 3 are Iatan units 1 and 2. Attached 21 as Schedule JAR-D-6C are confidential work papers of Staff from Case No. ER-2016-0156 22 that show the numbers of hours each unit was producing energy for the year and the cost 23 per megawatt hour to operate each generation unit during the year. 24

Q. Are KCPL and GMO planning to replace any of the capacity from the coal units they are retiring?

A. It is my understanding that KCPL and GMO have entered into two new purchase power agreements for wind.

Q. Should the wind PPAs be included in determining the rates that result from these rate cases?

A. No. It is my understanding that the facilities related to the PPAs will not be in-service until after the true-up period of these cases. However, customers can be charged costs for the wind PPAs through KCPL's and GMO's fuel adjustment clauses. This means that even though the PPA costs may not be considered in these current cases, KCPL and GMO will be able to recover 95% of them from their customers starting when wind facilities are inservice.

Q. Does OPC have any other concerns about the retirements of the Montrose and Sibley coal generation units?

A. Yes. As a part of the Department of Economic Development, OPC has concerns related to the loss of jobs that the retirement of the generation facilities will create. With the retirements at Montrose (KCPL) and Sibley (GMO) there will no longer be units at either site that produce power.

KCPL Depreciation Recommendation

Q. What is OPC's position on depreciation expense for Montrose units 2 and 3?

A. KCPL is seeking that its currently ordered depreciation rates be continued. OPC states it would be unjust and unreasonable to include continued depreciation expense for the Montrose units when determining going-forward rates given KCPL's announcement it is retiring the Montrose units at the end of 2018, six months after the end of the true-up period. Based on KCPL's application new rates will go into effect by December 29, 2018. KCPL's position would allow it to get depreciation expense built into rates for facilities it will soon retire at the Montrose location after rates become effective. Once the units are retired off KCPL's books, KCPL will then no longer be required to book depreciation expense to the depreciation reserve for those units, instead those dollars will become profit. OPC recommends that the depreciation rates for Montrose Units 2, 3, and Montrose common plant be set to zero percent as the units will no longer be used and useful by the time new rates from this case are effective.

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Q. What is OPC's recommendation if the Commission should grant continued depreciation expense for Montrose units 2 and 3 at the current ordered depreciation rates?

A. If the Commission orders KPCL to continue to use the current ordered depreciation rates 4 5 on the Montrose units, OPC requests that the Commission order a tracker be put in place to account for the depreciation expense KCPL will no longer book after the units are retired. 6 7 Ratepayers should be given full credit for the depreciation expense KCPL is collecting in rates for retired units, units which no longer provide either energy or capacity. Senate Bill 8 564, which was signed into law on June 1, 2018, allows for plant-in-service accounting, 9 which allows for the deferral of 85% of the depreciation expense for plant placed in-service 10 in between rate cases. This was previously positive regulatory lag for utility customers; 11 however, now customers will be picking up the deferred depreciation expense and rate of 12 return over a twenty-year period. With this reduction in risk for the shareholders of the 13 utility, it is only just and reasonable that the Commission protect ratepayers. The 14 Commission should do so by tracking and then offsetting future rate base by the 15 depreciation expense that was built into rates for retired units until rates are reset in the 16 next general rate case. With this reduction in risk for the utility shareholders, it is only just 17 and reasonable that the Commission protect ratepayers by tracking and then offsetting 18 future rate base with the value that was built into rates for the depreciation expense of the 19 20 units that will be retired at the end of the year until rates are reset in the next general rate 21 case.

Q. Has OPC estimated the magnitude of KCPL's unrecovered original cost for Montrose Units 2 and 3?

A. Yes. OPC estimates KCPL's potential under recovery of its investment in Montrose units 2, 3, and common plant at December 31, 2018, including cost of removal, to be \$65,129,906.

Q. Does OPC recommend recovery of KCPL's estimated unrecovered original cost for
 Montrose Units 2 and 3 in this case?

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A. No. The only recovery to be addressed in this case is the remaining depreciation expense until the units are retired by end of 2018. Based on KCPL's application, OPC recommends setting the depreciation rates to zero percent for all of the Montrose accounts, as the units will be retired by the effective date of new rates in this case.

Q. Is OPC aware of anything that may change its position on this matter?

A. Yes. OPC is aware that on June 1, 2018, President Trump ordered Energy Secretary Rick Perry to "prepare immediate steps" to stop the closing of unprofitable coal and nuclear plants around the country. ³ OPC is unaware of the timing of a recommendation to be produced by Energy Secretary Perry and if it would be in time to delay KPLC's retirements of the Montrose units and common plant.

11 GMO Depreciation Recommendation

Q. What is OPC's position on depreciation expense for Sibley Units 1, 2, and 3?

A. GMO is seeking that its currently ordered depreciation rates be continued. OPC states it would be unjust and unreasonable to include continued depreciation expense for the Sibley units when determining going-forward rates given GMO's announcement it is retiring the Montrose units at the end of 2018, six months after the end of the true-up period. Based on GMO's application new rates will go into effect by December 29, 2018. GMO's position would allow it to get continued depreciation expense built into rates for facilities it will soon retire at the Sibley location after rates become effective. Once the units are retired off the books, GMO when then no longer be required to book depreciation expense to the depreciation reserve for those units, instead those dollars will become profit. OPC recommends that the depreciation rates for Sibley Units 1, 2, 3, and Sibley common plant be set to zero percent as the units will no longer be used and useful by the time new rates from this case are effective.

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Q. What is OPC's position on depreciation expense for Lake Road Unit 4/6?

³ New York Times article "Trump Orders a Lifeline for Struggling Coal and Nuclear Plants" published June 1,2018

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A. The Commission should order GMO to continue to use the currently ordered depreciation rates for Lake Road Unit 4/6, and depreciation expense for Lake Road Unit 4/6 should be built into GMO's revenue requirement. Since GMO has announced it is retiring Lake Road Unit 4/6 by the end of 2019, it is appropriate to place a tracker on the depreciation expense that is built into rates for the unit in order to protect and give ratepayers recognition of amount they are paying in depreciation expense for the unit in rates, but that will no longer be booked as depreciation expense once unit is retired.

Q. What is OPC's recommendation if the Commission should grant continued depreciation expense for Sibley units 1, 2, and 3, and Lake Road Unit 4/6 at the current ordered depreciation rates?

If the Commission orders GMO to continue to use the current ordered depreciation rates A. 11 on the Sibley units and Lake Road unit 4/6, OPC requests that the Commission order a 12 tracker be put in place to account for the depreciation expense GMO will no longer book 13 after the units are retired. Ratepayers should be given full credit for the depreciation 14 expense GMO is collecting in rates for retired units, units which no longer provide either 15 energy or capacity. Senate Bill 564, which was signed into law on June 1, 2018, allows for 16 plant-in-service accounting which allows for the deferral of 85% of the depreciation 17 18 expense for plant placed in-service in between rate cases. This was previously positive regulatory lag for the customers; however, now ratepayers will be picking up the deferred 19 20 depreciation expense and rate of return over a twenty-year period. With this reduction in risk for the shareholders of the utility, it is only just and reasonable that the Commission 21 22 protect ratepayers. The Commission should do so by tracking and then offsetting future rate base the depreciation expense that was built into rates for retired units until rates are 23 24 reset in the next general rate case.

Q. Has OPC estimated the magnitude of the unrecovered original cost for the Sibley facilities and Lake Road unit 4/6?

27 28 A. OPC calculated the unrecovered cost for Sibley units 1, 2, 3, and common plant including cost of removal to be \$409,028,847 at the expected retirement date of December 31, 2018.

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Of that value, Sibley unit 3 is estimated to have a short fall of \$280,036,531 if retired at the end of 2018. Lake Road Unit 4/6 expected to retire by end of 2019 is projected to be under recover by \$34,400,426, including cost of removal if retired in December of 2019 as GMO has publicly announced.

Q. Does OPC recommend recovery of GMO's estimated unrecovered original cost for Sibley Units 1, 2, and 3, and Lake Road Unit 4/6 in this case?

A. No. The only recovery to be addressed in this case for these units is the remaining depreciation expense until the units are retired by end of 2018. Based on KCPL's application OPC recommends setting the depreciation rates to zero percent for all of the Sibley accounts, as the units will be retired by the effective date of new rates in this case.

For Lake Road Unit 4/6, OPC recommends the continued use of the current ordered depreciation rates in this case, and OPC recommends a tracker for depreciation expense for Lake Road Unit 4/6, so that rate payer can receive credit for the payment of depreciation expense that was built into rates for this unit after it is retired by the end of 2019 until new rates are set in the next general rate case.

16 Q. Is OPC aware of anything that may change its position on this matter?

A. Yes. OPC is aware that on June 1, 2018, President Trump ordered Energy Secretary Rick
 Perry to "prepare immediate steps" to stop the closing of unprofitable coal and nuclear
 plants around the country. ⁴ OPC is unaware of the timing of a recommendation to be
 produced by Energy Secretary Perry and if it would be in time to delay the retirement of
 the Montrose units and common plant.

- 22 **GMO Additional Amortization**
 - Q. As part of Case No. ER-2016-0156, did GMO get an additional amortization related to depreciation expense?

⁴ New York Times article "Trump Orders a Lifeline for Struggling Coal and Nuclear Plants" published June 1,2018

A. Yes as part of the Stipulation and Agreement in Case No. ER-2016-0156, GMO was granted an additional amortization of \$7.2 million related to depreciation expense.

Q. Does OPC have a position related to this additional amortization?

A. OPC's first recommendation is to remove the additional amortization on a going forward basis. As part of the stipulation and agreement the additional amortization was to be in place until rates were set in the next rate case—this case; also as part of that next rate case parties were to recommend where the dollars collected as additional depreciation expense should be booked. OPC requests that the Commission order GMO to record all additional depreciation expense received through the additional amortization of \$7.2 million since its last rate case as reserve additions to the FERC sub accounts for the Sibley generation facilities. The language from the Non-Unanimous Stipulation and Agreement follows:

In addition to the attached schedule, GMO shall be allowed to collect an annual amortization amount equal to \$7.2 million. This additional amortization shall be booked and accounted for on an annual basis until GMO's next general electric rate case. In GMO's next filed rate case the Commission will determine the distribution of the additional amortization. The balance will be used to cover any deficiencies in reserves across production, transmission and distribution accounts. Any undistributed balance will be used as an offset to future rate base. This amortization is for purpose of settlement of this case only and does not constitute an agreement as to the methodology or a precedent for any future rate case.

OPC also requests that the Commission not continue to authorize the additional amortization for depreciation expense of \$7.2 million. The Commission should remove the \$7.2 million additional amortization from rates going forward.

KCPL Operations and Maintenance Expense

Q. What is OPC's position on operations and maintenance expense for the Montrose units?

A. Consistent with OPC's position on depreciation expense, for the Montrose units and Montrose common plant that will be retired by the end of 2018 no operations or

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maintenance expense should be included in the costs of service used for setting rates in these cases.

Q. Why should the costs of service for KCPL not include operations and maintenance expense for Montrose?

A Based on the applications, new rates are projected to become effective December 29, 2018. When paired with the announcement of the retirements of the Montrose units and Montrose common plant by the end of 2018, the longest the units could be operating under new rates is two days. It is very likely that by the time new rates from these cases are effective the units will have been retired. Ratepayers should not be asked to pay for operations and maintenance expense on units that are no longer used and are not providing a benefit.

11 GMO Operations and Maintenance Expense

Q. What is OPC's position on operations and maintenance expense for the Sibley units and Sibley common plant?

A. Consistent with OPC's position on depreciation expense, for the Sibley units and Sibley common plant that will be retired by the end of 2018 no operations or maintenance expense should be included in the costs of service used for setting rates in these cases.

Q. Why should the costs of service for GMO not include operations and maintenance expense for Sibley?

A Based on the applications, new rates are projected to become effective December 29, 2018.
When paired with the announcement of the retirements of the Sibley units and Sibley
common plant by the end of 2018, the longest the units could be operating under new rates
is two days. It is very likely that by the time new rates from these cases are effective the
units will have been retired. Ratepayers should not be asked to pay for operations and
maintenance expense on units that are no longer used and are not providing a benefit.

ONE CIS 1 2 Q. What is the cost of the ONE CIS solution? A. KCPL and GMO have provided three in person update meetings related to the project to 3 which I personally attended there may have been more. In the April 3, 2018 update meeting 4 provided a confidential value of the ONE CIS. The original control budget was ** 5 **; additionally during this update meeting KCPL and GMO discussed a 93 day 6 7 delay during system integration testing and provided an updated estimate of the budget ** ** at completion. 8 9 Q. What is OPC's position related to ONE CIS solution? A. OPC seeks to allocate the costs that are fair and just for Missouri ratepayers. The ONE 10 CIS is a major factor of the savings that the merger with Westar as it will allow Westar to 11 be integrated into the system without having to foot the bill for an entirely separate system 12 at some point in the future. 13 14 Q. What allocation method is OPC recommending? 15 A. At this time OPC still has pending discovery related to this issue. OPC will be better 16 positioned at rebuttal to provide an allocation method and cost estimates for the KCPL MO 17 and GMO jurisdictions to be included in the cost of service for these cases. Q. Would you briefly summarize OPC's recommendations provided in your testimony? 18 19 A. OPC recommends that all costs associated with the retirements of KCPL's Montrose units 2, 3, and common plant, and GMO's Sibley units 1, 2, 3, and common plant not be included 20 in the costs of service of KPCL and GMO used for setting rates in these cases as these units 21 will be retired by end of 2018. The estimated reserve shortfall for KCPL's Montrose 22 facilities is \$65,129,906. The estimated reserves shortfall for GMO's Sibley facilities is 23 \$409,028,847. Additionally, OPC recommends the Commission stop the \$7.2 million 24 25 additional amortization related to depreciation expense for GMO. OPC recommends a decrease in depreciation expense for KCPL related to the Montrose retirements of 26 27 \$3,139,379 based on depreciation expense of true-up accounting schedules from Case No. ER-2016-0285. OPC recommends a decrease in depreciation expense for GMO related to 28

the Sibley retirements of \$9,875,199 based on depreciation expense of direct accounting schedules from Case No. ER-2016-0156. OPC recommends that all operations and maintenance expenses for KCPL Montrose and GMO Sibley facilities not be included in the costs of service of KPCL and GMO used for setting rates in these cases.

5 Q. Does this conclude your direct testimony?

A. Yes, it does.

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John A. Robinett

I am employed as a Utility Engineering Specialist for The Missouri Office of the Public Counsel (OPC). I began employment with OPC in August of 2016. In May of 2008, I graduated from the University of Missouri-Rolla (now Missouri University of Science and Technology) with a Bachelor of Science degree in Mechanical Engineering.

During my time as an undergraduate, I was employed as an engineering intern for the Missouri Department of Transportation (MoDOT) in their Central Laboratory located in Jefferson City, Missouri for three consecutive summers. During my time with MoDOT, I performed various qualification tests on materials for the Soil, Aggregate, and General Materials sections. A list of duties and tests performed are below:

- Compressive strength testing of 4" and 6" concrete cylinders and fracture analysis
- Graduations of soil, aggregate, and reflective glass beads
- Sample preparations of soil, aggregate, concrete, and steel
- Flat and elongated testing of aggregate
- Micro-deval and LA testing of aggregate
- Bend testing of welded wire and rebar
- Tensile testing of welded, braided cable, and rebar
- Hardness testing of fasteners (plain black and galvanized washers, nuts, and bolts)
- Proof loading and tensile testing of bolts
- Sample collection from active road constructions sites
- Set up and performed the initial testing on a new piece of equipment called a Linear Traverse / Image Analysis
- Wrote operators manual for the Linear Traverse / Image Analysis Machine
- Trained a fulltime employee on how to operate the machine prior to my return to school
- Assisted in batching concrete mixes for testing, mixing the concrete, slump cone testing, percent air testing, and specimen molding of cylinders and beams

Upon graduation, I accepted a position as an Engineer I in the Product Evaluation Group for Hughes Christensen Company, a division of Baker Hughes, Inc. (Baker), an oil field service company. During my employment with Baker, I performed failure analysis on oil field drill bits as well as composed findings reports which were forwarded to the field engineers in order for them to report to the company the conclusions of the failure causes.

I previously was employed as a Utility Engineering Specialist I, II, III for the Missouri Public Service Commission (Commission). My employment with the Commission spanned from April of 2010 to August of 2016. My duties involved analyzing deprecation rates and studies for utility companies and presenting expert testimony in rate cases before the Commission.

Listed below are the cases in which I have supplied testimony, comments, and/or depreciation rates accompanied by a signed affidavit.

Company	Case Number	Issue	Party
Empire District Electric Company	EO-2018-0092	Rebuttal, Surrebuttal, Affidavit in Opposition, Additional Affidavit and Live Testimony	Office of Public Counsel (OPC)
Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities	GR-2018-0013	Rebuttal and Surrebuttal Testimony depreciation, general plant amortization	OPC
Laclede Gas Company Missouri Gas Energy Spire Missouri East Spire Missouri West	GO-2016-0332 GO-2016-0333 GO-2017-0201 GO-2017-0202 GR-2017-0215 GR-2017-0216	ISRS Over collection of depreciation expense and ROE based on Western District Opinion Docket No. WD80544	OPC
Gascony Water Company, Inc.	WR-2017-0343	Rebuttal, Surrebuttal, and Live Testimony rate base, depreciation, NARUC USoA Class designation	OPC
Missouri American Water Company	WR-2017-0285	Direct, Rebuttal, Surrebuttal, and Live Testimony depreciation, ami, negative reserve, Lead Line	OPC
Indian Hills Utility Operating Company, Inc.	WR-2017-0259	Direct, Rebuttal, Surrebuttal, and Live Testimony Rate Base (extension of electric service, leak repairs)	OPC
Laclede Gas Company Missouri Gas Energy	GR-2017-0215 GR-2017-0216	Direct, Rebuttal, Surrebuttal, True-up Rebuttal, and Live Testimony depreciation, retirement work in progress, combined heat and power, ISRS	OPC

Company	Case Number	Issue	Party
Empire District Electric Company	EO-2018-0048	IRP Special issues	OPC
Kansas City Power & Light Company	EO-2018-0046	IRP Special issues	OPC
Kansas City Power & Light Company Greater Missouri Operations	EO-2018-0045	IRP Special issues	OPC
Kansas City Power & Light Company Greater Missouri Operations	EO-2017-0230	2017 IRP annual update comments	OPC
Empire District Electric Company	EO-2017-0065	Direct, Rebuttal, Surrebuttal, and Live Testimony FAC Prudence Review Heat Rate	OPC
Ameren Missouri	ER-2016-0179	Direct, Rebuttal, Testimony Heat Rate Testing &Depreciation	OPC
Kansas City Power & Light Company	ER-2016-0285	Direct, Rebuttal, Surrebuttal, and Live Testimony Heat Rate Testing &Depreciation	OPC
Empire District Electric Company Merger with Liberty	EM-2016-0213	Rebuttal Testimony	Missouri Public Service Commission (MOPSC)
Empire District Electric Company	ER-2016-0023	Depreciation Study, Direct, Rebuttal, and Surrebuttal Testimony	MOPSC
Hillcrest Utility Operating Company, Inc.	SR-2016-0065	Depreciation Review	MOPSC
Hillcrest Utility Operating Company, Inc.	WR-2016-0064	Depreciation Review	MOPSC
Missouri American Water Company	WR-2015-0301	Depreciation Study, Direct, Rebuttal, and Surrebuttal Testimony	MOPSC

Company	Case Number	Issue	Party
Bilyeu Ridge Water Company, LLC Midland Water Company, Inc. Moore Bend Water Utility, LLC	WR-2015-0192 WR-2015-0193 WR-2015-0194	Depreciation Review	
Riverfork Water Company Taney County Water, LLC Valley Woods Utility, LLC(Water) Valley Woods Utility, LLC(Sewer) Consolidated into Ozark International, Inc.	WR-2015-0195 WR-2015-0196 WR-2015-0197 SR-2015-0198 Consolidated into WR-2015-0192	*filed depreciation rates not accompanied by signed affidavit	MOPSC
I. H. Utilities, Inc. sale to Indian Hills Utility Operating Company, Inc.	WO-2016-0045	Depreciation Rate Adoption CCN	MOPSC
Missouri American Water Company CCN City of Arnold	SA-2015-0150	Depreciation Rate Adoption CCN	MOPSC
Empire District Electric Company	ER-2014-0351	Direct, Rebuttal, and Surrebuttal Testimony	MOPSC
West 16th Street Sewer Company, W.P.C. Sewer Company, Village Water and Sewer Company, Inc. and Raccoon Creek Utility Operating Company, Inc.	SM-2015-0014	Depreciation Rate Adoption	MOPSC
Brandco Investments LLC and Hillcrest Utility Operating Company, Inc.	WO-2014-0340	Depreciation Rate Adoption, Rebuttal Testimony	MOPSC
Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities	GR-2014-0152	Direct, Rebuttal, Surrebuttal and Live Testimony	MOPSC
Summit Natural Gas of Missouri, Inc	GR-2014-0086	Depreciation Study, Direct and Rebuttal Testimony	MOPSC
P.C.B., Inc.	SR-2014-0068	Depreciation Review	MOPSC
M.P.B., Inc.	SR-2014-0067	Depreciation Review	MOPSC
Roy-L Utilities	WR-2013-0543	Depreciation Review	MOPSC
Roy-L Utilities	SR-2013-0544	Depreciation Review	MOPSC
Missouri Gas Energy Division of Laclede Gas Company	GR-2014-0007	Depreciation Study, Direct and Rebuttal Testimony	MOPSC
Central Rivers Wastewater Utility, Inc.	SA-2014-00005	Depreciation Rate Adoption	MOPSC

Company	Case Number	Issue	Party
Empire District Electric Company	ER-2012-0345	Depreciation Study, Direct, Rebuttal, and Surrebuttal Testimony	MOPSC
Empire District Electric Company	WR-2012-0300	Depreciation Review	MOPSC
Laclede Gas Company	GO-2012-0363	Depreciation Authority Order Rebuttal, Surrebuttal and Live Testimony	MOPSC
Moore Bend Water Company, Inc. sale to Moore Bend Water Utility, LLC (Water)	WM-2012-0335	Depreciation Rate Adoption	MOPSC
Oakbrier Water Company, Inc.	WR-2012-0267	Depreciation Review	MOPSC
Lakeland Heights Water Co., Inc.	WR-2012-0266	Depreciation Review	MOPSC
R.D. Sewer Co., L.L.C.	SR-2012-0263	Depreciation Review	MOPSC
Canyon Treatment Facility, LLC	SA-2010-0219	Depreciation Rate Adoption- CCN	MOPSC
Taney County Water, LLC	WR-2012-0163	Depreciation Review	MOPSC
Sale of Saddlebrooke Water and Sewer Infrastructure, LLC to Missouri American Water Company (Sewer)	SA-2012-0067	Rebuttal Testimony	MOPSC
Sale of Saddlebrooke Water and Sewer Infrastructure, LLC to Missouri American Water Company (Water)	WA-2012-0066	Rebuttal Testimony	MOPSC
Midland Water Company, Inc.	WR-2012-0031	Depreciation Review	MOPSC
Sale of KMB Utility Corporation to Algonquin Water Resources of Missouri, LLC, d/b/a Liberty Water (Sewer)	SO-2011-0351	Depreciation Rate Adoption	MOPSC
Sale of KMB Utility Corporation to Algonquin Water Resources of Missouri, LLC, d/b/a Liberty Water (Water)	WO-2011-0350	Depreciation Rate Adoption	MOPSC
Sale of Noel Water Company, Inc. to Algonquin Water Resources of Missouri, LLC, d/b/a Liberty Water (Water)	WO-2011-0328	Depreciation Rate Adoption	MOPSC
Sale of Taney County Utilities Corporation to Taney County Water, LLC (Water)	WM-2011-0143	Depreciation Rate Adoption	MOPSC

Company	Case Number	Issue	Party
Empire District Electric Company	ER-2011-0004	Depreciation Study, Direct, Rebuttal, and Surrebuttal Testimony	MOPSC
Rex Deffenderfer Enterprises, Inc.	WR-2011-0056	Depreciation Review	MOPSC
Tri-States Utility, Inc	WR-2011-0037	Depreciation Review	MOPSC
Southern Missouri Gas Company, L.P.	GE-2011-0096	Depreciation Study Waiver	MOPSC
Southern Missouri Gas Company, L.P.	GR-2010-0347	Depreciation Review	MOPSC
KMB Utility Corporation (Sewer)	SR-2010-0346	Depreciation Review	MOPSC
KMB Utility Corporation (Water)	WR-2010-0345	Depreciation Review	MOPSC
Middlefork Water Company	WR-2010-0309	Depreciation Review	MOPSC



KCP&L Announces Plans to Cease Burning Coal at Three Power Plants

1/20/2015

MEDIA CONTACT: KCP&L 24-Hour Media Hotline (816) 392-9455

KCP&L FURTHERS SUSTAINABILITY COMMITMENT BY ANNOUNCING PLANS TO CEASE BURNING COAL AT THREE POWER PLANTS

KANSAS CITY, Mo. (January 20, 2015) — Kansas City Power & Light Company (KCP&L) announced today that in the coming years it will no longer burn coal at three of its coal-fired power plants, Montrose Station, one of its units at Lake Road Station and two of its units at Sibley Station. This announcement furthers the company's commitment to a sustainable energy future and balanced generation portfolio. Lake Road's boiler already has the ability to burn natural gas and the company plans to operate on natural gas once it ceases coal combustion. In the coming years, KCP&L will make final decisions regarding whether to retire the units at Montrose and Sibley, or convert them to an alternative fuel source.

"After evaluating options for future environmental regulation compliance, ending coal use at these plants is the most cost effective and cleanest option for our customers," said Terry Bassham, President and CEO of Great Plains Energy and KCP&L. "By retiring or converting more than 700 megawatts of coal-fired generation, we'll take an even bigger step toward reducing emissions and improving the air quality in our region."

The decision comes in part as a result from recent Environmental Protection Agency (EPA) regulations, which would require KCP&L to make significant environmental upgrades in the coming years in order to continue burning coal at these power plants. While retrofitting our largest, newer coal-fired power plants was the most cost-effective way to comply with environmental regulations, the same cannot be said for the older, smaller units at Montrose, Lake Road and Sibley. Retiring or converting the units at Montrose, Lake Road and Sibley will be a more cost-effective way to meet environmental regulations.

Generating Unit:	Capacity:	In-Service Year:	Cease Coal Burning By:
Lake Road 6	96 MW	1967	December 31, 2016
Montrose 1	170 MW	1958	December 31, 2016
Sibley 1	48 MW	1960	December 31, 2019
Sibley 2	51 MW	1962	December 31, 2019
Montrose 2	164 MW	1960	December 31, 2021
Montrose 3	176 MW	1964	December 31, 2021

Timeline for Coal Cessation:

While this decision will impact employees at Montrose, Lake Road and Sibley, the utility does not anticipate that any employees will lose jobs as a result. KCP&L will find job opportunities within the company for displaced employees.

"For decades, coal has been a reliable, very low cost way to provide power to our customers, and is one reason why our rates are lower than the national average," said Bassham. "However, as our nation moves to a cleaner, more sustainable energy future, our industry is facing increasing environmental scrutiny and regulations, many of which are focused on coal-fired generation. Our commitment and focus is to move to a cleaner energy future for our region while balancing the cost impact to our customers."

Today's announcement is part of the utility's larger plan to provide cleaner energy to

Schedule JAR-2

https://www.kcpl.com/about-kcpl/media-center/2015/january/kcpl-announces-plans-to-ceas... 6/5/2018

the region. KCP&L has the largest renewable energy and largest per capita energy efficiency portfolios of any investor-owned utility in the region. In addition, the utility recently made a number of new environmental investments and commitments, including the announcement of up to 400 MW of additional wind power and expanded energy-efficiency programs for customers.

For more information on KCP&L's sustainability efforts, visit <u>www.kcpl.com/environment</u>.

About Great Plains Energy:

Headquartered in Kansas City, Mo., Great Plains Energy Incorporated (NYSE: GXP) is the holding company of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company, two of the leading regulated providers of electricity in the Midwest. Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company use KCP&L as a brand name. More information about the companies is available on the Internet at: <u>www.greatplainsenergy.com</u> or <u>www.kcpl.com</u>.

Forward-Looking Statements:

Statements made in this release that are not based on historical facts are forwardlooking, may involve risks and uncertainties, and are intended to be as of the date when made. Forward-looking statements include, but are not limited to, the outcome of regulatory proceedings, cost estimates of capital projects and other matters affecting future operations. In connection with the safe harbor provisions of the Private Securities Litigation Reform Act of 1995, Great Plains Energy and KCP&L are providing a number of important factors that could cause actual results to differ materially from the provided forward-looking information. These important factors include: future economic conditions in regional, national and international markets and their effects on sales, prices and costs; prices and availability of electricity in regional and national wholesale markets; market perception of the energy industry, Great Plains Energy and KCP&L; changes in business strategy, operations or development plans; the outcome of contract negotiations for goods and services; effects of current or proposed state and federal legislative and regulatory actions or developments, including, but not limited to, deregulation, re-regulation and restructuring of the electric utility industry; decisions of regulators regarding rates the Companies can charge for electricity; adverse changes in applicable laws, regulations, rules, principles or practices governing tax, accounting and

environmental matters including, but not limited to, air and water quality; financial market conditions and performance including, but not limited to, changes in interest rates and credit spreads and in availability and cost of capital and the effects on nuclear decommissioning trust and pension plan assets and costs; impairments of long-lived assets or goodwill; credit ratings; inflation rates; effectiveness of risk management policies and procedures and the ability of counterparties to satisfy their contractual commitments; impact of terrorist acts, including but not limited to cyber terrorism; ability to carry out marketing and sales plans; weather conditions including, but not limited to, weather-related damage and their effects on sales, prices and costs; cost, availability, quality and deliverability of fuel; the inherent uncertainties in estimating the effects of weather, economic conditions and other factors on customer consumption and financial results; ability to achieve generation goals and the occurrence and duration of planned and unplanned generation outages; delays in the anticipated in-service dates and cost increases of generation, transmission, distribution or other projects; Great Plains Energy's ability to successfully manage transmission joint venture; the inherent risks associated with the ownership and operation of a nuclear facility including, but not limited to, environmental, health, safety, regulatory and financial risks; workforce risks, including, but not limited to, increased costs of retirement, health care and other benefits; and other risks and uncertainties.

This list of factors is not all-inclusive because it is not possible to predict all factors. Other risk factors are detailed from time to time in Great Plains Energy's and KCP&L's quarterly reports on Form 10-Q and annual report on Form 10-K filed with the Securities and Exchange Commission. Each forward-looking statement speaks only as of the date of the particular statement. Great Plains Energy and KCP&L undertake no obligation to publicly update or revise any forward-looking statement, whether as a result of new information, future events or otherwise.

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KCP&L Continues Sustainability Commitment by Announcing Retirement of Six Units at... Page 1 of 6



KCPL Continues Sustainability Commitment by Announcing Retirement of Six Units at Three Power Plants

KCP&L Continues Sustainability Commitment by Announcing Retirement of Six Units at Three Power Plants

6/2/2017

Media Contact: KCP&L 24-hour Media Hotline (816) 392-9455

KANSAS CITY, Mo. (June 2, 2017) — Kansas City Power & Light Company (KCP&L) announces its plans to retire six generating units at the company's Montrose, Lake Road and Sibley Stations. These actions further the company's commitment to a sustainable energy future and balanced generation portfolio.

"When these power plants started operation more than 50 years ago, coal was the primary means of producing energy. Today, as part of our diverse portfolio, we have cleaner ways to generate the energy our customers need," said Terry Bassham, President and CEO of Great Plains Energy and KCP&L. "After considering many options, it is clear that retiring units at Montrose, Lake Road and Sibley is the most cost-effective way to meet our customers' energy needs as we continue to move to a more sustainable energy future."

In 2015, KCP&L announced the company was considering retiring the coal units or converting them to an alternative fuel source at these plants. One coal-fired unit at the

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Lake Road Station was converted to natural gas in 2016. Since that time, several emerging industry trends and changing circumstances led the company to announce its plans to retire the six generating units.

A number of factors contributed to the decision to retire these units, including:

- Reduction in wholesale electricity market prices. The value of energy produced by these plants has dropped in recent years, primarily driven by new wind generation and lower natural gas prices.
- Near-term capacity needs. KCP&L does not anticipate needing new capacity for many years with expected relatively flat long-term peak load growth. In addition, the amount of reserve generating capacity the company is required to carry has been reduced.
- Plant age. The impacted units are older, with all beginning service between 1960-1969. Making costly investments in the units does not make financial sense when compared to other generation sources.
- Expected environmental compliance costs. It is not economic to retrofit these plants with the controls necessary to meet expected environmental requirements.

Wind energy sources have become a much more economic generation resource for the region. According to the Southwest Power Pool, of which KCP&L is a member, energy generation from wind has increased 30 percent year-over-year in 2016. KCP&L announced plans in 2016 to purchase an additional 500 megawatts (MW) of power from two new wind facilities at Osborn and Rock Creek. In 2017, the company is set to increase its renewable portfolio to more than 1,450 MW, or greater than 20 percent of KCP&L's total generating capacity needs.

"In addition to our substantial renewable energy portfolio, KCP&L has the largest per capita energy efficiency portfolio of any investor-owned utility in the region," said Bassham. "By retiring these plants, KCP&L is taking another step forward in our plan to provide cleaner, cost effective energy to our customers."

KCP&L intends to retire all the Montrose and Sibley coal units by December 31, 2018. The Lake Road natural gas unit will be retired by December 31, 2019. Lake Road's steam operations are not impacted by today's announcement. KCP&L is committed to making every reasonable effort to find job opportunities within the company for employees currently working at these plants.

Timeline for Retirement: Schedule JAR-2

KCP&L Continues Sustainability Commitment by Announcing Retirement of Six Units at... Page 3 of 6

Generating Unit	Capacity	In-service	Retire by
Lake Road 4/6	97 MW	1967	Dec. 31, 2019
Montrose 2	164 MW	1960	Dec. 31, 2018
Montrose 3	176 MW	1964	Dec. 31, 2018
Sibley 1	48 MW	1960	Dec. 31, 2018
Sibley 2	51 MW	1962	Dec. 31, 2018
Sibley 3	364 MW	1969	Dec. 31, 2018

For more information on KCP&L's sustainability efforts, visit www.kcpl.com/environment.

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Great Plains Energy and KCP&L; changes in business strategy, operations or development plans; the outcome of contract negotiations for goods and services; effects of current or proposed state and federal legislative and regulatory actions or developments, including, but not limited to, deregulation, re-regulation and restructuring of the electric utility industry; decisions of regulators regarding rates the Companies can charge for electricity; adverse changes in applicable laws, regulations, rules, principles or practices governing tax, accounting and environmental matters including, but not limited to, air and water quality; financial market conditions and performance including, but not limited to, changes in interest rates and credit spreads and in availability and cost of capital and the effects on nuclear decommissioning trust and pension plan assets and costs; impairments of long-lived assets or goodwill; credit ratings; inflation rates; effectiveness of risk management policies and procedures and the ability of counterparties to satisfy their contractual commitments; impact of terrorist acts, including but not limited to cyber terrorism; ability to carry out marketing and sales plans; weather conditions including, but not limited to, weather-related damage and their effects on sales, prices and costs; cost, availability, quality and deliverability of fuel; the inherent uncertainties in estimating the effects of weather, economic conditions and other factors on customer consumption and financial results; ability to achieve generation goals and the occurrence and duration of planned and unplanned generation outages; delays in the anticipated in-service dates and cost increases of generation, transmission, distribution or other projects; Great Plains Energy's ability to successfully manage transmission joint venture; the inherent risks associated with the ownership and operation of a nuclear facility including, but not limited to, environmental, health, safety, regulatory and financial risks; workforce risks, including, but not limited to, increased costs of retirement, health care and other benefits; and other risks and uncertainties.

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ER-2018-0145 and ER-2018-146

KANSAS CITY POWER & LIGHT COMPANY and KANSAS CITY POWER LIGHT GREATER OPERATIONSCOMPANY

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SPP 2017 RESOURCE ADEQUACY REPORT

Published on June 19th, 2017

By Resource Adequacy Coordination

REVISION HISTORY

DATE OR VERSION NUMBER	AUTHOR	CHANGE DESCRIPTION	COMMENTS

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OVERVIEW AND ASSUMPTIONS

SPP submitted Tariff revisions to implement a Resource Adequacy Requirement (RAR) on March 3, 2017 (<u>ER17-1098</u>).

Attachment AA requires a Load Responsible Entity (LRE) to maintain capacity required to meet its load and planning reserve obligations. No later than June 15th of each year, a final report on the status of each LRE's compliance with the RAR for the upcoming Summer Season will be posted on the SPP website.

This report will assess resource adequacy across the SPP Balancing Authority (BA) for the 2017 Summer Season, and provide a five-year outlook of the BA and LREs, beginning with the 2018 Summer Season. The data for this report originates from the LRE and Generator Owner (GO) submitted Workbooks.

The reserve margin calculation is an industry planning metric used to examine future resource adequacy. This deterministic approach examines the forecasted Net Peak Demand (load) and the availability of existing resources to serve the forecasted Net Peak Demand for the current Summer Season and a five-year outlook.

Net Peak Demand projections, or load forecasts, are provided by each LRE. Load forecasts include peak hourly load, or Peak Demand, for the Summer Season of each year. Peak Demand projections are based on normal weather (50/50 distribution) and provided on a non-coincident basis.

DEFINITIONS

Firm Capacity

The projected accredited capacity of an LRE's commercially operable generating units, or portions of generating units, adjusted to reflect purchases and sales of accredited capacity with another party, and that is supported by firm transmission service to the LRE's load, or is Deliverable Capacity to meet the PRM portion of the Resource Adequacy Requirement.

Firm Power

Power sales and purchases deliverable with firm transmission service where the seller assumes the obligation to serve the purchaser's load with capacity, energy, and planning reserves that must be continuously available in a manner comparable to power delivered to native load customers.

Load Responsible Entity

An Asset Owner represented in the Integrated Marketplace with a registered physical asset that is either a) load or b) an Export Interchange Transaction as specified in Section 5.4 of Attachment AA.

Net Peak Demand

The forecasted Peak Demand less the a) projected impacts of demand response programs and behind-the-meter generation that are controllable and dispatchable and not registered as a Resource and b) contract amount of Firm Power purchased under agreements in effect as of the time of the forecasted Peak Demand, plus the contract amount of Firm Power sold to others in effect as of the time of the forecasted Peak Demand

Peak Demand

The highest demand including transmission losses for energy measured over a one clock hour period

Planning Reserve Margin

The Planning Reserve Margin ("PRM") shall be twelve percent (12%). If an LRE's Firm Capacity is comprised of at least seventy-five percent (75%) hydro-based generation, then such PRM shall be nine point eight nine percent (9.89%).

Resource Adequacy Requirement

The Resource Adequacy Requirement is equal to the LRE's Summer Season Net Peak Demand plus its Summer Season Net Peak Demand multiplied by the PRM.

Summer Season

June 1st through September 30th of each year.

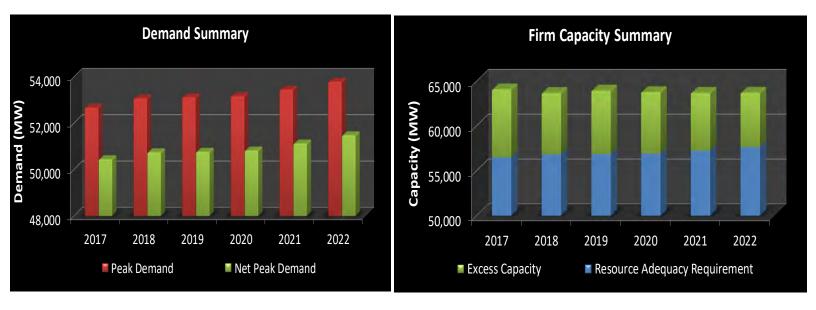
SPP HIGHLIGHTS

The Southwest Power Pool (SPP) BA covers 575,000 square miles and encompasses all or parts of Arkansas, Iowa, Kansas, Louisiana, Minnesota, Missouri, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas and Wyoming. The SPP footprint has approximately 61,000 miles of transmission lines, 756 generating plants, and 4,811 transmission-class substations, and it serves a population of 18 million people.



- SPP's PRM target is 12%
- The six year assessment period starting in 2017 based on Firm Capacity is projected to be 29.7% and decreases to 25.9% by 2022
- Six year (2017-2022) peak demand average annual growth rate is 1.1%



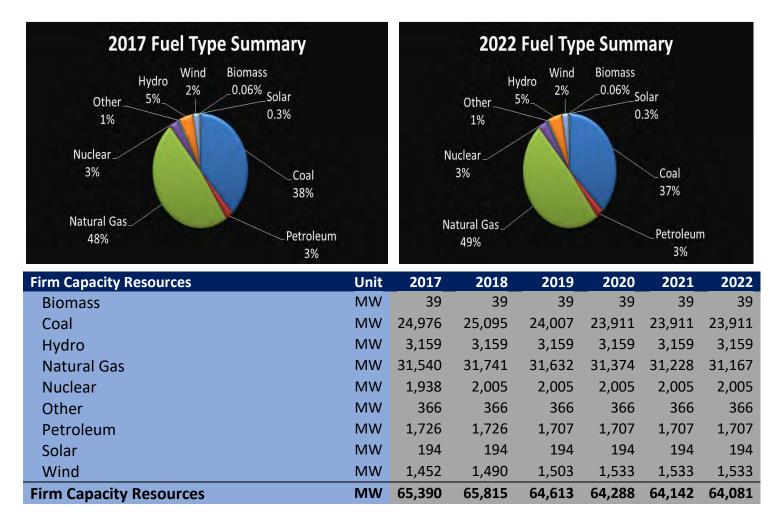


SPP CURRENT AND FIVE-YEAR OUTLOOK

Demand Summary	2017	2018	2019	2020	2021	2022
Peak Demand (Forecasted)	52,665	53,065	53,116	53,158	53 <i>,</i> 440	53,779
Controllable and Dispatchable DR - Available	663	708	736	744	730	725
Controllable and Dispatchable DEG - Available	164	160	161	142	139	141
Firm Power Purchases	1,655	1,655	1,553	1,551	1,551	1,551
Firm Power Sales	260	200	100	99	100	115
Net Peak Demand (Forecasted)	50,444	50,743	50,767	50,821	51,121	51,477
Firm Capacity (Units - MW)	2017	2018	2019	2020	2021	2022
Other Capacity Adjustments - Additions	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	397	41	41	5	5	5
Confirmed Retirements	16	388	1,170	1,379	1,469	1,469
Unconfirmed Retirements	0	83	236	236	236	478
Scheduled Outages	520	566	45	0	0	0
Transmission Limitations	14	0	0	0	0	0
Firm Capacity Purchases	277	277	277	279	279	179
Firm Capacity Sales	674	549	934	934	534	534
Firm Capacity Resources	65,390	65,815	64,613	64,288	64,142	64,081
Firm Capacity Resources (Other)	0	0	0	0	0	0
Firm Capacity (e.g. 65,390+674+277-14-520-397)	65,410	66,035	65,738	65,496	64,951	64,790
Planning Reserve Margin (e.g. 65,390-50,444/65,390)	29.7%	30.1%	29.5%	28.9%	27.1%	25.9%
Resource Adequacy Requirement (e.g. 50,444 *12%)	56,497	56,832	56,859	56,919	57 <i>,</i> 256	57,655
SPP Excess Capacity	8,913	9,203	8,879	8,577	7,695	7,135

FUEL TYPE SUMMARY

The Firm Capacity is based on the available LRE and GO excess generation for the Summer Season. The amount of confirmed retirements increases from 16 MW to 1,469 MW by 2022, with coal accounting for 61% of the retirements and natural gas for the remaining 39%.

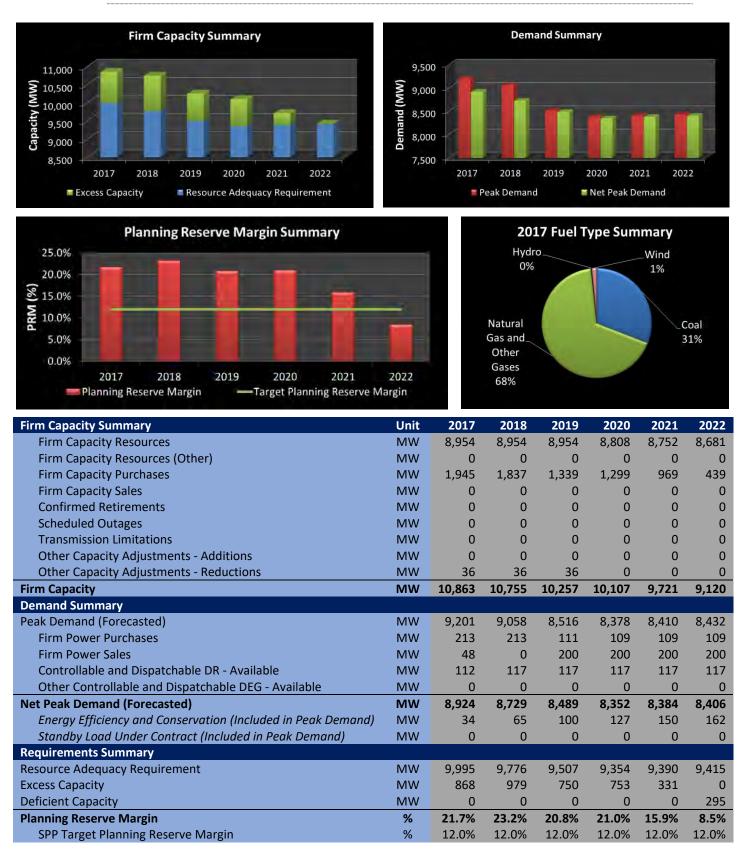


LOAD RESPONSIBLE ENTITIES

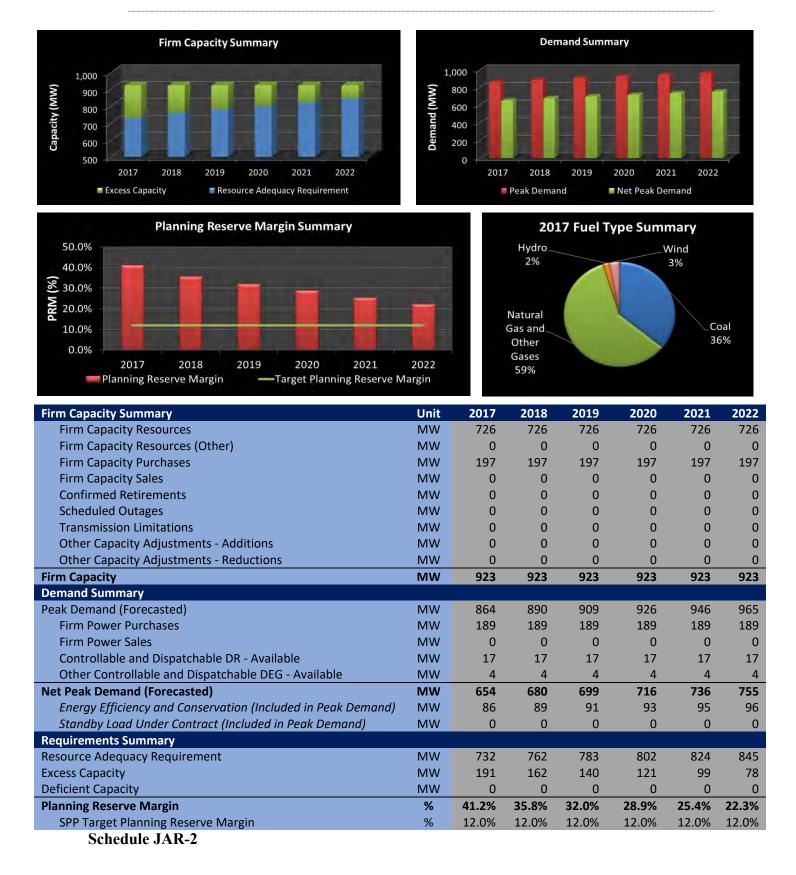
American Electric Power Arkansas Electric Cooperative Corporation **Basin Electric Power Cooperative** Carthage Water & Electric Plant (Did not meet the RAR for the 2017 Summer Season) City of Beatrice Nebraska City of Chanute **City of Fremont** City of Grand Island Nebraska Utilities City of Hastings Nebraska Utilities City of Malden Board of Public Works City of Neligh City of Piggott Municipal Light & Water City of Poplar Bluff Municipal Utilities City of Superior Nebraska City of West Plains Board of Public Works City Utilities of Springfield **Empire District Electric Company** ETEC/NTEC/Tex-La **Falls City Utilities Golden Spread Electric Cooperative** Grand River Dam Authority Greater Missouri Operations Company (KCP&L) Harlan Municipal Utilities Heartland Consumers Power District Independence Power & Light Kansas City Board of Public Utilities Kansas City Power & Light Kansas Municipal Energy Agency – EMP1 Kansas Municipal Energy Agency – EMP2 Kansas Municipal Energy Agency – EMP3 Kansas Municipal Energy Agency - Eudora Kansas Municipal Energy Agency - GC Kansas Municipal Energy Agency - Meade **Kansas Power Pool** Kennett Board of Public Works Lincoln Electric System MidAmerican Energy Company **Midwest Energy** Missouri Joint Municipal Electric Utility Commission **Missouri River Energy Services** Municipal Energy Agency of Nebraska

Nebraska City Utilities Nebraska Public Power District Northwestern Energy NSP Energy Marketing (Not included due to all load being served with Firm Power contracts) Oklahoma Gas & Electric Company Oklahoma Municipal Power Authority **Omaha Public Power District** Paragould Light and Water Commission (Not included due to all load being served with Firm Power contracts) People's Electric Cooperative South Sioux City Nebraska Southwestern Power Administration Southwestern Public Service Company Sunflower Electric Power Corporation West Texas Municipals Westar Energy Western Area Power Administration Western Farmers Energy Services

AMERICAN ELECTRIC POWER



ARKANSAS ELECTRIC COOPERATIVE CORPORATION

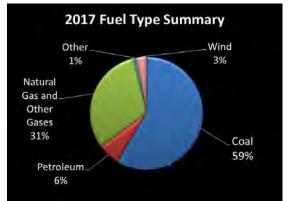


BASIN ELECTRIC POWER COOPERATIVE









Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	3,250	3,416	3,207	3,208	3,208	3,208
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	66	218	221	221	170	170
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	3,316	3,634	3,428	3,429	3,378	3,378
Demand Summary							
Peak Demand (Forecasted)	MW	2,768	2,795	2,863	2,903	2,953	2,993
Firm Power Purchases	MW	240	240	240	240	240	240
Firm Power Sales	MW	110	98	100	99	100	115
Controllable and Dispatchable DR - Available	MW	6	6	6	6	6	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	2,631	2,646	2,717	2,756	2,807	2,868
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	2,947	2,964	3,043	3,086	3,144	3,212
Excess Capacity	MW	369	670	384	343	234	165
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	26.0%	37.3%	26.1%	24.4%	20.3%	17.8%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

CARTHAGE WATER & ELECTRIC PLANT





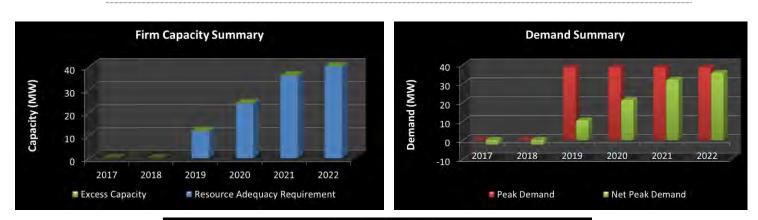


2017 Fuel Type Summary



Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	0	0	0	0	0	0
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	32	32	32	32	32	32
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	32	32	32	32	32	32
Demand Summary							
Peak Demand (Forecasted)	MW	64	64	65	65	66	66
Firm Power Purchases	MW	7	7	7	7	7	7
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	19	19	19	19	19	19
Net Peak Demand (Forecasted)	MW	38	38	39	39	40	40
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	43	43	44	44	45	45
Excess Capacity	MW	0	0	0	0	0	0
Deficient Capacity	MW	11	11	12	12	13	13
Planning Reserve Margin	%	-15.8%	-15.8%	-17.9%	-17.9%	-20.0%	-20.0%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%
Schedule JAR-2							

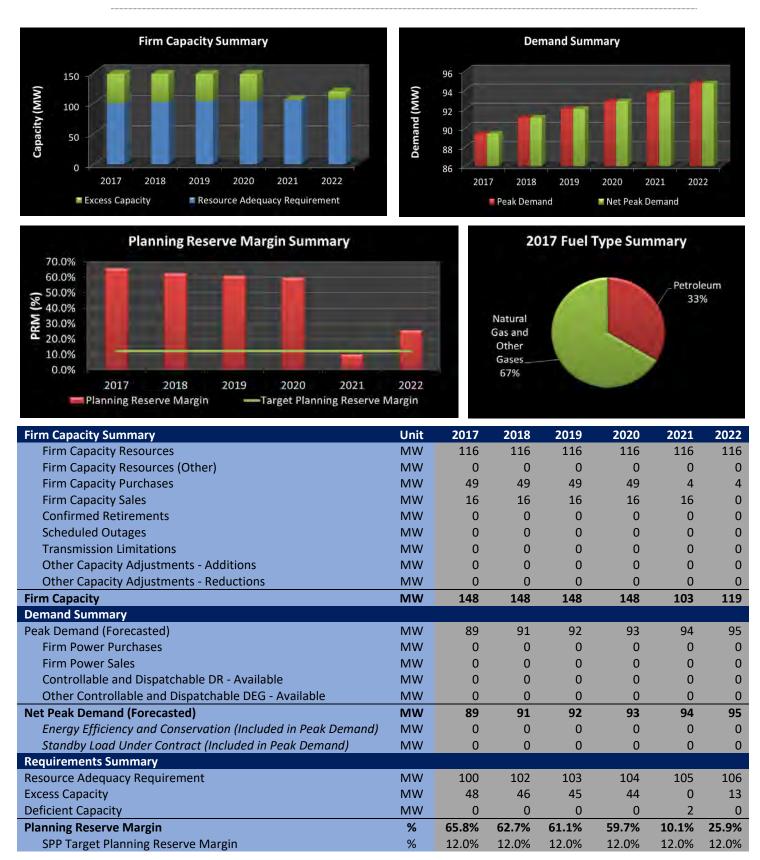
CITY OF BEATRICE NEBRASKA



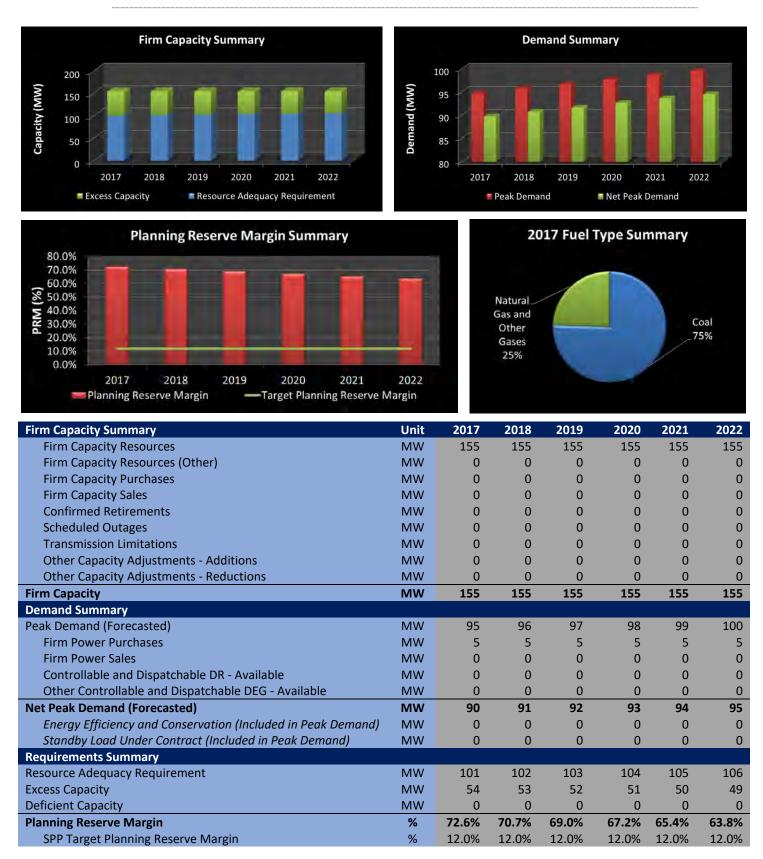


Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	0	0	0	0	0	0
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	11	14	18	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	0	0	11	14	18	0
Demand Summary							
Peak Demand (Forecasted)	MW	0	0	39	39	39	39
Firm Power Purchases	MW	3	3	28	17	6	3
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	-3	-3	11	21	32	36
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW			12	24	36	40
Excess Capacity	MW			0	0	0	0
Deficient Capacity	MW			1	10	18	40
Planning Reserve Margin	%			4.8%	-34.3%	-43.9%	-100.0%
SPP Target Planning Reserve Margin	%			12.0%	12.0%	12.0%	12.0%
Sahadula IAD 2							

CITY OF CHANUTE



CITY OF FREMONT



CITY OF GRAND ISLAND NEBRASKA UTILITIES



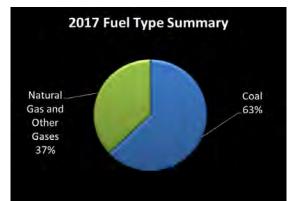
MW **Resource Adequacy Requirement** MW **Excess Capacity Deficient Capacity** MW **Planning Reserve Margin** % 80.1% 79.1% 77.9% 76.5% 74.1% 75.3% SPP Target Planning Reserve Margin % 12.0% 12.0% 12.0% 12.0% 12.0% 12.0%

CITY OF HASTINGS NEBRASKA UTILITIES





Demand Summary



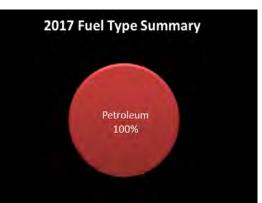
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	160	165	165	165	165	165
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	160	165	165	165	165	165
Demand Summary							
Peak Demand (Forecasted)	MW	93	94	96	97	98	99
Firm Power Purchases	MW	12	12	12	12	12	12
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	81	82	84	85	86	87
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	91	92	94	95	96	98
Excess Capacity	MW	70	73	72	71	69	68
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	97.8%	101.0%	98.1%	95.3%	92.5%	89.7%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

CITY OF MALDEN BOARD OF PUBLIC WORKS



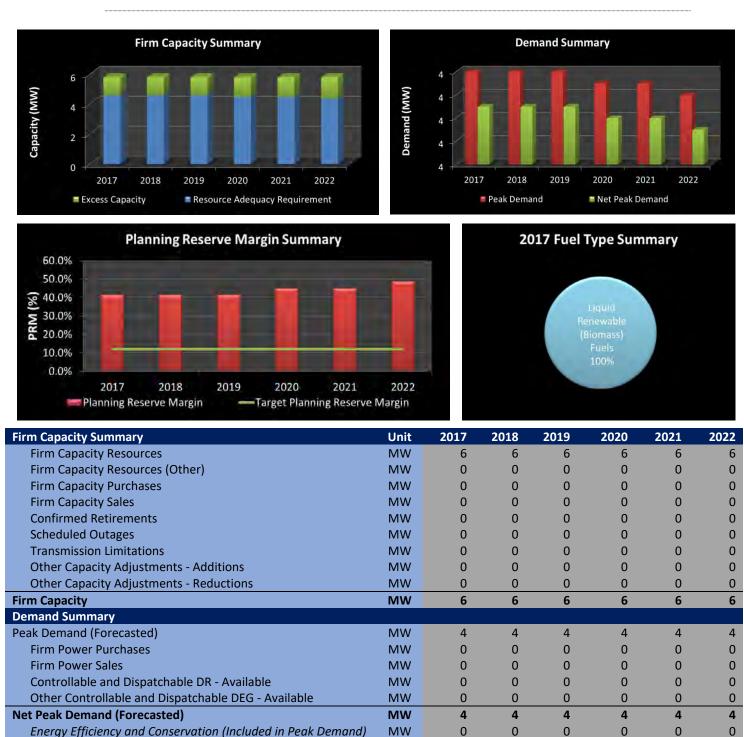






Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	16	16	16	16	16	16
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	16	16	16	16	16	16
Demand Summary							
Peak Demand (Forecasted)	MW	12	12	12	12	12	12
Firm Power Purchases	MW	5	5	5	5	5	5
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	7	7	7	7	7	7
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	7	7	7	8	8	8
Excess Capacity	MW	9	9	9	8	8	8
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	146.2%	146.2%	142.4%	138.8%	135.3%	128.6%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

CITY OF NELIGH



MW

MW

MW

MW

%

%

0

5

1

0

41.5%

12.0%

0

5

1

0

41.5%

12.0%

0

5

1

0

41.5%

12.0%

0

4

1

0

45.0%

12.0%

0

4

1

0

45.0%

12.0%

0

4

1

0

48.7%

12.0%

Schedule JAR-2

SPP Target Planning Reserve Margin

Requirements Summary

Planning Reserve Margin

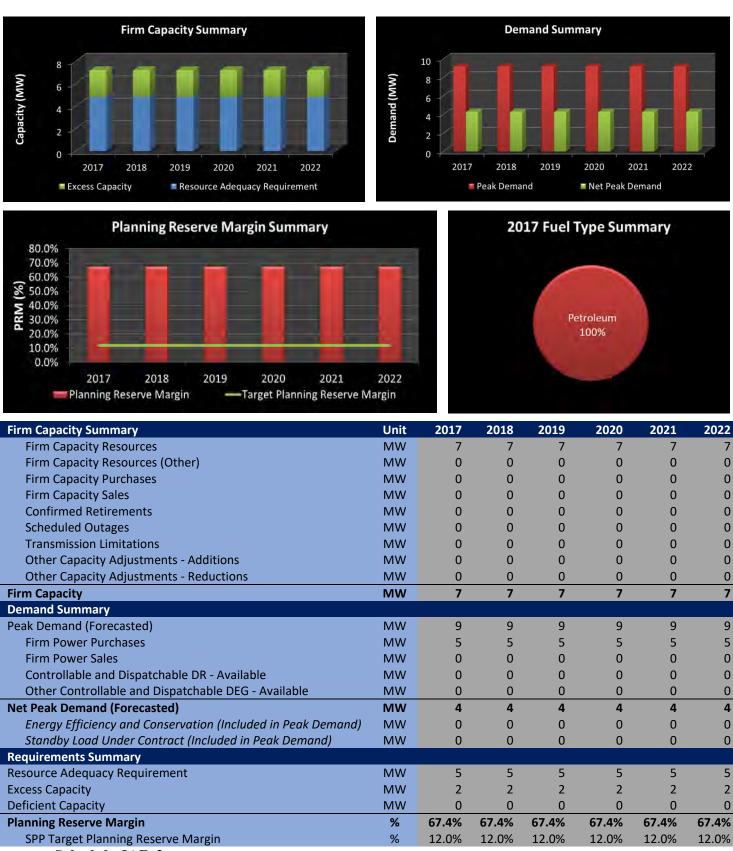
Excess Capacity

Deficient Capacity

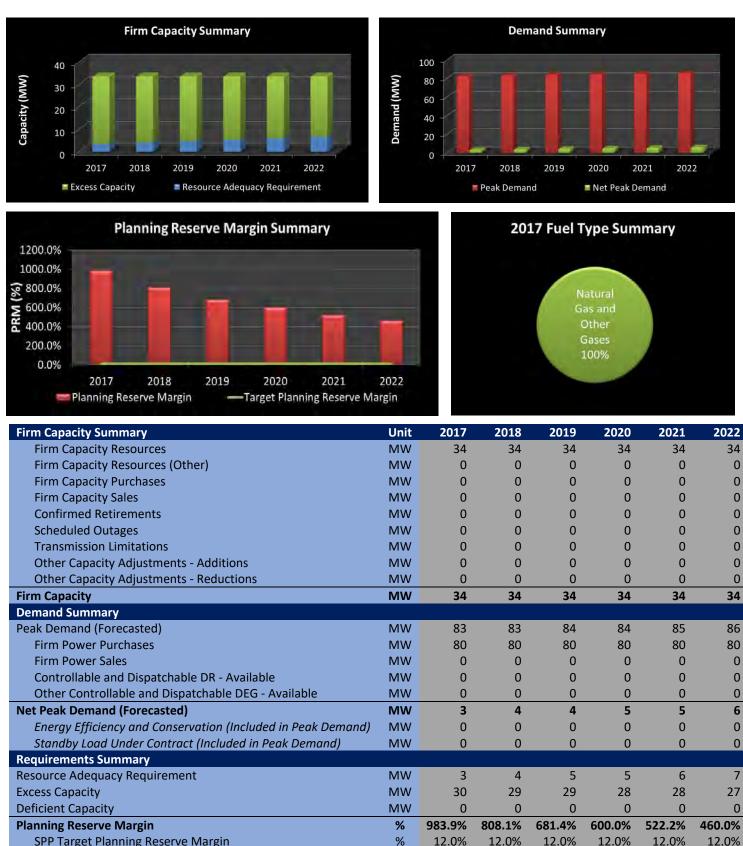
Resource Adequacy Requirement

Standby Load Under Contract (Included in Peak Demand)

CITY OF PIGGOTT MUNICIPAL LIGHT & WATER

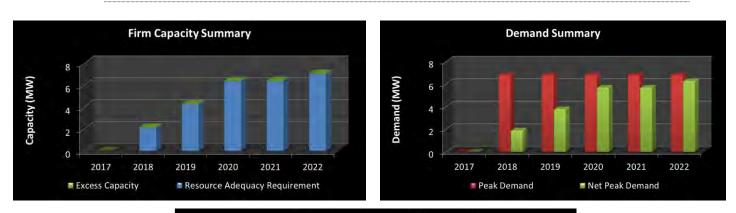


CITY OF POPLAR BLUFF MUNICIPAL UTILITIES



SPP Target Planning Reserve Margin Schedule JAR-2

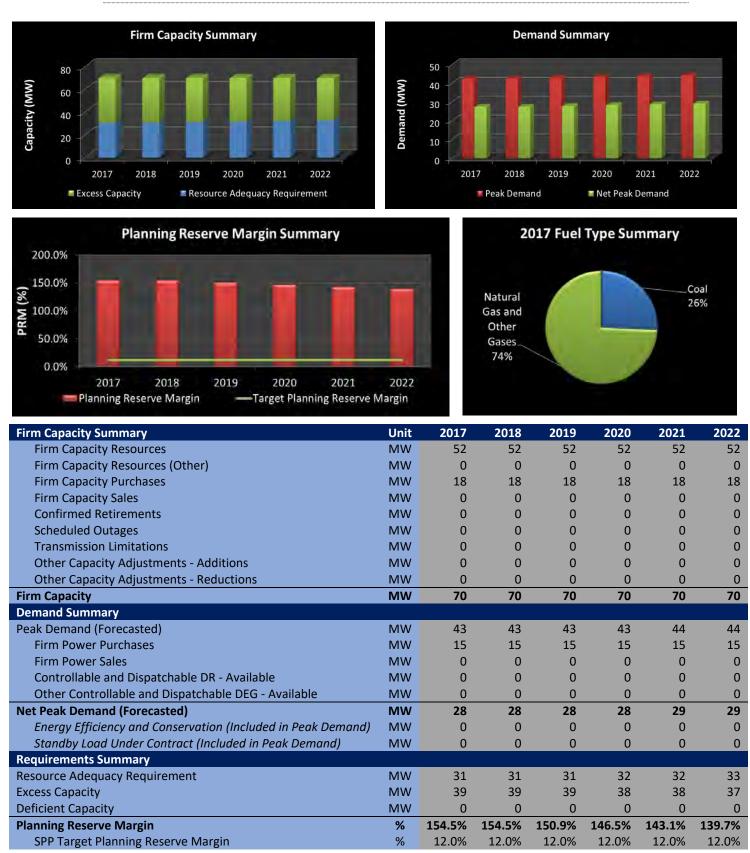
CITY OF SUPERIOR NEBRASKA



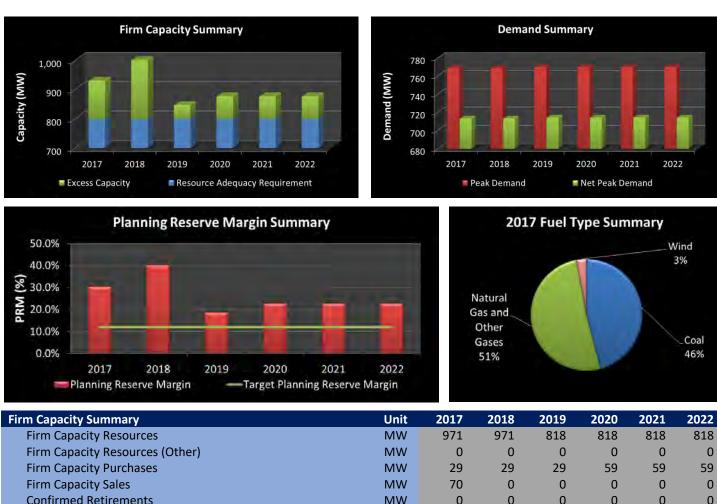


Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	0	0	0	0	0	0
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	0	0	0	0	0	0
Demand Summary							
Peak Demand (Forecasted)	MW	0	7	7	7	7	7
Firm Power Purchases	MW	0	5	3	1	1	1
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	0	2	4	6	6	6
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW		2	4	6	6	7
Excess Capacity	MW		0	0	0	0	0
Deficient Capacity	MW		2	4	6	6	7
Planning Reserve Margin	%		-100.0%	-100.0%	-100.0%	-100.0%	-100.0%
SPP Target Planning Reserve Margin	%		12.0%	12.0%	12.0%	12.0%	12.0%
Schodulo IAR 2							

CITY OF WEST PLAINS BOARD OF PUBLIC WORKS

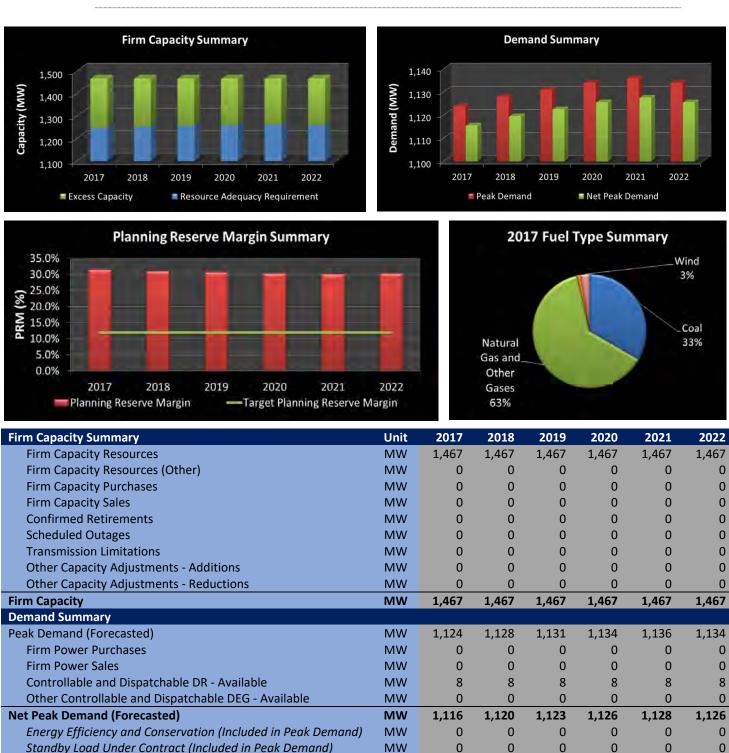


CITY UTILITIES OF SPRINGFIELD



Firm Capacity Purchases	MW	29	29	29	59	59	59	
Firm Capacity Sales	MW	70	0	0	0	0	0	
Confirmed Retirements	MW	0	0	0	0	0	0	
Scheduled Outages	MW	0	0	0	0	0	0	
Transmission Limitations	MW	0	0	0	0	0	0	
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0	
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0	
Firm Capacity	MW	930	1,000	847	877	877	877	
Demand Summary								
Peak Demand (Forecasted)	MW	769	769	770	770	770	770	
Firm Power Purchases	MW	55	55	55	55	55	55	
Firm Power Sales	MW	0	0	0	0	0	0	
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0	
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0	
Net Peak Demand (Forecasted)	MW	714	714	715	715	715	715	
Energy Efficiency and Conservation (Included in Peak Demand)	MW	8	9	9	10	10	11	
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0	
Requirements Summary								
Resource Adequacy Requirement	MW	799	799	800	800	800	800	
Excess Capacity	MW	131	201	47	77	77	77	
Deficient Capacity	MW	0	0	0	0	0	0	
Planning Reserve Margin	%	30.3%	40.1%	18.5%	22.7%	22.7%	22.7%	
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%	

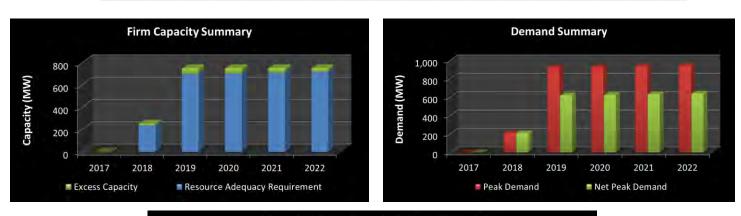
EMPIRE DISTRICT ELECTRIC COMPANY

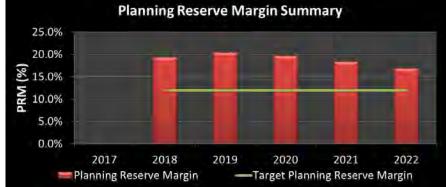


Standby Load Under Contract (Included in Peak Demand) MW 0 0 0 0 0 **Requirements Summary Resource Adequacy Requirement** MW 1,249 1,254 1,257 1,261 1,263 1,261 **Excess Capacity** MW 218 210 206 204 206 213 **Deficient Capacity** MW 0 0 0 0 0 **Planning Reserve Margin** % 31.0% 31.5% 30.7% 30.3% 30.1% 30.3% SPP Target Planning Reserve Margin % 12.0% 12.0% 12.0% 12.0% 12.0% 12.0%

0

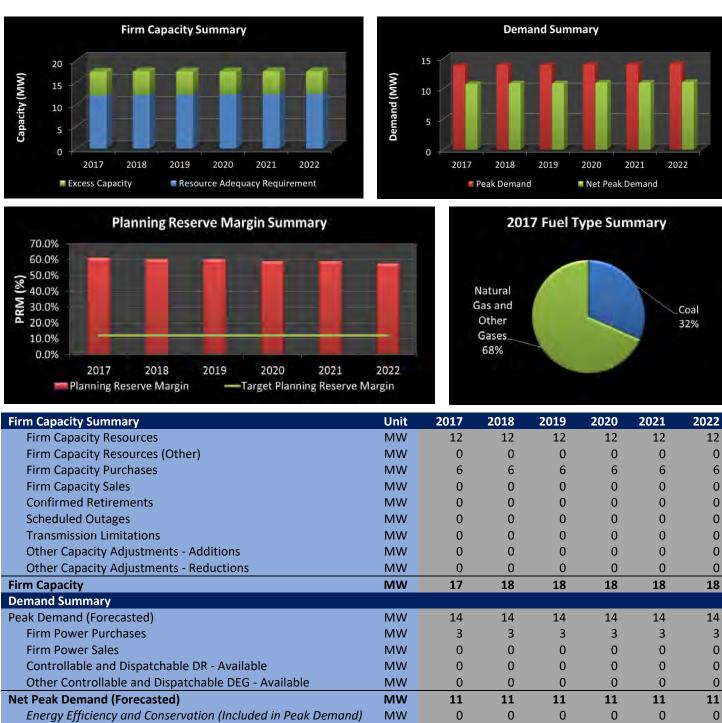
ETEC/NTEC/TEX-LA





Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	685	685	685	685	685	685
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	66	66	66	66	66	66
Firm Capacity Sales	MW	606	498	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	144	252	750	750	750	750
Demand Summary							
Peak Demand (Forecasted)	MW	0	212	925	929	936	944
Firm Power Purchases	MW	102	102	302	302	302	302
Firm Power Sales	MW	102	102	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	0	212	623	627	634	642
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW		237	698	702	710	719
Excess Capacity	MW		16	53	48	40	31
Deficient Capacity	MW		0	0	0	0	0
Planning Reserve Margin	%		19.3%	20.4%	19.7%	18.4%	16.9%
SPP Target Planning Reserve Margin	%		12.0%	12.0%	12.0%	12.0%	12.0%

FALLS CITY UTILITIES



Energy Efficiency and Conservation (Included in Peak Demand) MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	12	12	12	12	12	12
Excess Capacity	MW	5	5	5	5	5	5
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	61.1%	60.6%	60.6%	59.1%	59.1%	57.7%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

GOLDEN SPREAD ELECTRIC COOPERATIVE





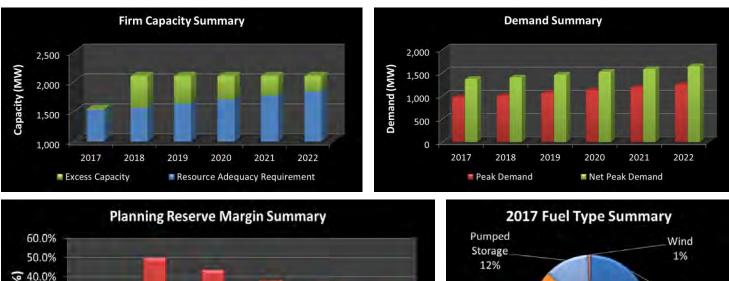
Demand Summary 1,450 Demand (MW) 1,400 1,350 1,300 1,250 1,200 2017 2018 2019 2020 2021 2022 Peak Demand Net Peak Demand



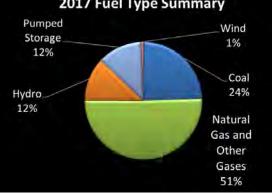


Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	1,494	1,549	1,549	1,549	1,549	1,549
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	1,494	1,549	1,549	1,549	1,549	1,549
Demand Summary							
Peak Demand (Forecasted)	MW	1,358	1,383	1,405	1,421	1,434	1,444
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	51	51	51	51	51	51
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	1,307	1,332	1,354	1,370	1,383	1,393
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	1,463	1,491	1,516	1,534	1,549	1,560
Excess Capacity	MW	31	58	33	16	0	0
Deficient Capacity	MW	0	0	0	0	0	11
Planning Reserve Margin	%	14.4%	16.4%	14.4%	13.1%	12.0%	11.2%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

GRAND RIVER DAM AUTHORITY





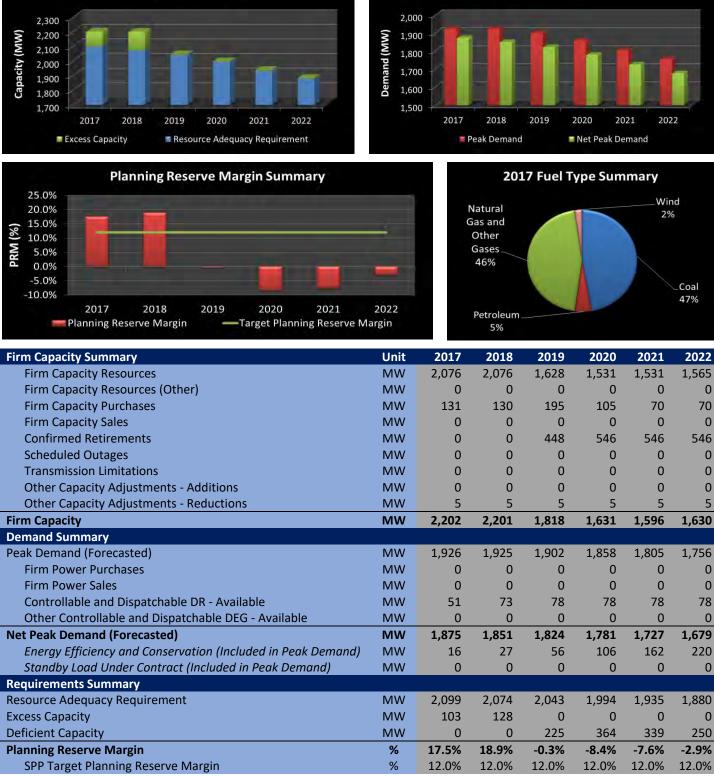


Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	2,121	2,121	2,121	2,121	2,121	2,121
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	0	20	20	20	20	20
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	520	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	55	0	0	0	0	0
Firm Capacity	MW	1,546	2,101	2,101	2,101	2,101	2,101
Demand Summary							
Peak Demand (Forecasted)	MW	970	1,002	1,063	1,123	1,183	1,244
Firm Power Purchases	MW	13	13	13	13	13	13
Firm Power Sales	MW	442	442	442	442	442	442
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	30	30	30	30	30	30
Net Peak Demand (Forecasted)	MW	1,369	1,401	1,462	1,522	1,582	1,643
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	1,534	1,570	1,638	1,705	1,772	1,841
Excess Capacity	MW	12	531	463	396	328	260
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	12.9%	49.9%	43.6%	38.0%	32.7%	27.8%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%
Schedule JAR-2							

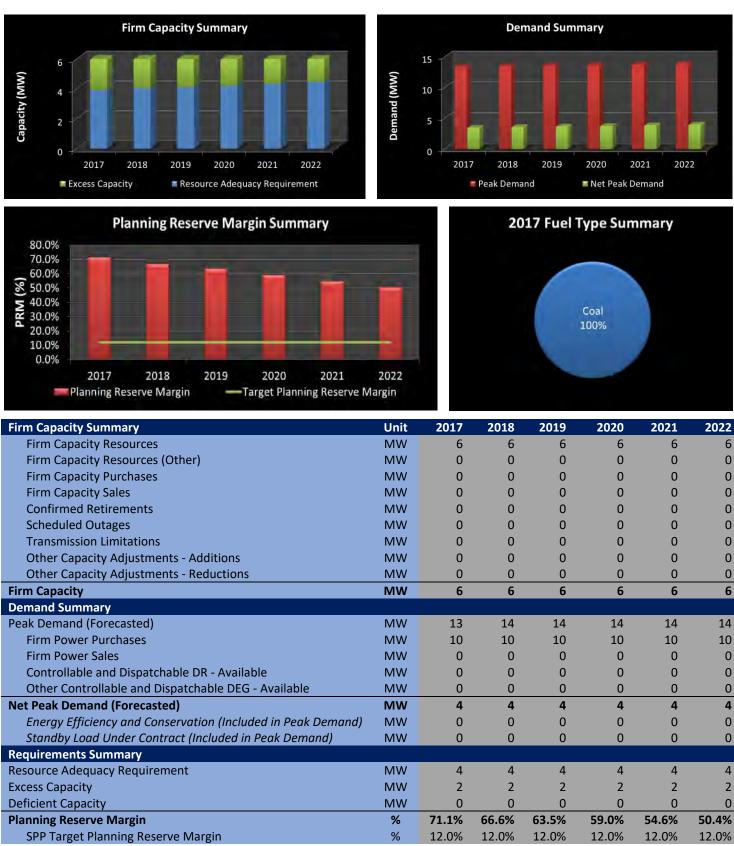
GREATER MISSOURI OPERATIONS COMPANY (KCP&L)

Firm Capacity Summary

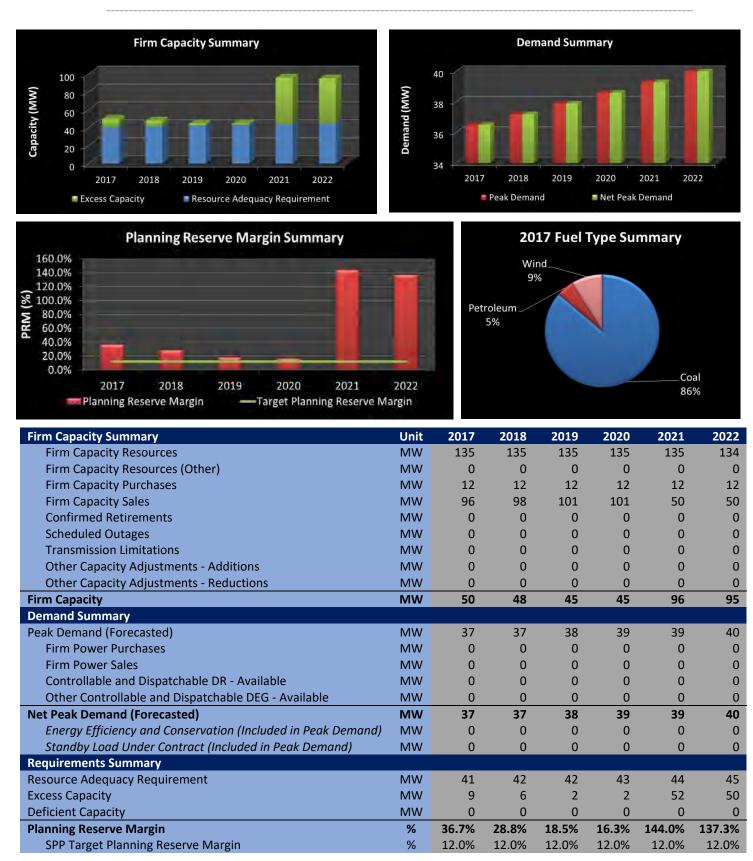
Demand Summary



HARLAN MUNICIPAL UTILITIES



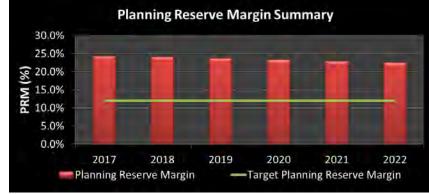
HEARTLAND CONSUMERS POWER DISTRICT

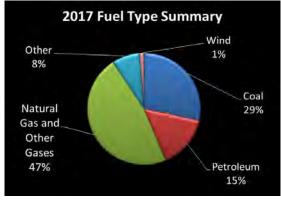


INDEPENDENCE POWER & LIGHT









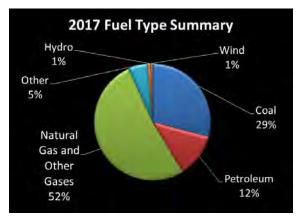
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	268	268	268	268	268	268
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	113	114	114	114	114	114
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	381	382	382	382	382	382
Demand Summary							
Peak Demand (Forecasted)	MW	307	308	309	310	311	312
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	307	308	309	310	311	312
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	344	345	346	347	349	350
Excess Capacity	MW	38	37	36	35	34	33
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	24.3%	24.2%	23.7%	23.3%	22.9%	22.5%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

KANSAS CITY BOARD OF PUBLIC UTILITIES







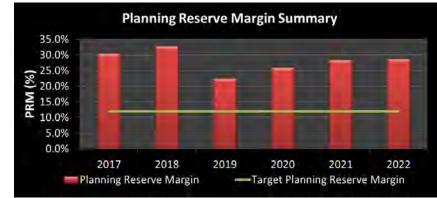


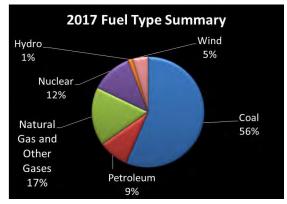
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	810	810	810	810	810	810
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	11	11	11	11	11	11
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	821	821	821	821	821	821
Demand Summary							
Peak Demand (Forecasted)	MW	492	494	494	496	496	498
Firm Power Purchases	MW	43	43	43	43	43	43
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	449	451	451	453	453	455
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	502	505	505	507	507	509
Excess Capacity	MW	318	316	316	314	314	311
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	82.9%	82.1%	82.1%	81.3%	81.3%	80.5%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%
Schedule JAR-2							

KANSAS CITY POWER & LIGHT









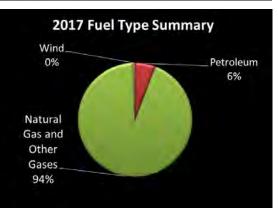
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	4,344	4,344	4,010	4,010	4,010	4,010
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	256	292	292	292	292	292
Firm Capacity Sales	MW	137	112	167	77	15	15
Confirmed Retirements	MW	0	0	334	334	334	334
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	4,463	4,524	4,135	4,225	4,287	4,287
Demand Summary							
Peak Demand (Forecasted)	MW	3,440	3,441	3,434	3,419	3,390	3,380
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	20	34	55	64	51	51
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	3,420	3,407	3,379	3,355	3,339	3,329
Energy Efficiency and Conservation (Included in Peak Demand)	MW	18	35	54	75	112	141
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	3,831	3,816	3,784	3,757	3,740	3,729
Excess Capacity	MW	633	708	351	467	547	558
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	30.5%	32.8%	22.4%	25.9%	28.4%	28.8%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

KANSAS MUNICIPAL ENERGY AGENCY - EMP1



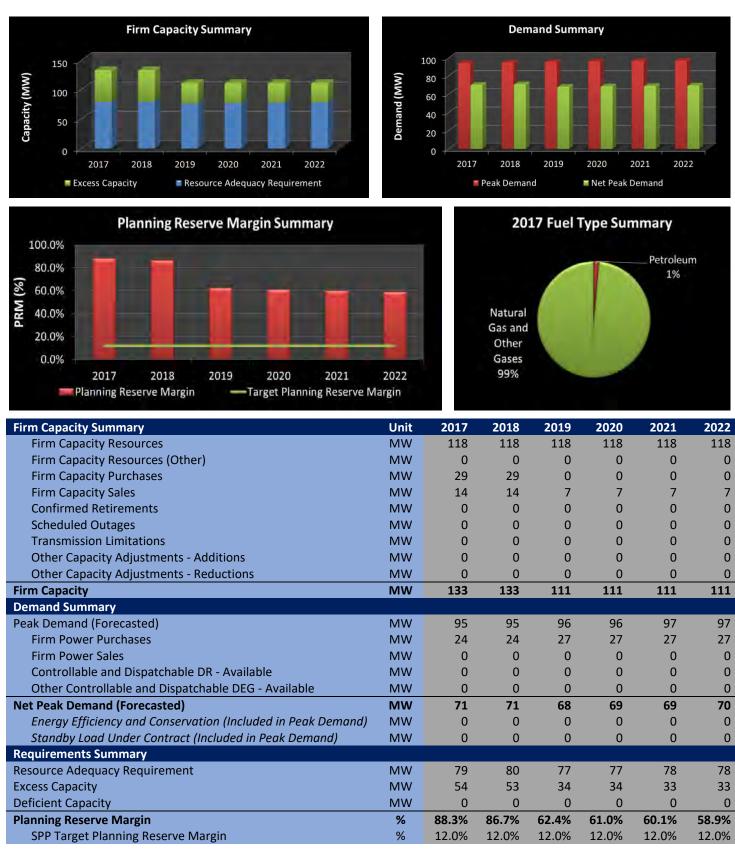






Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	80	80	80	80	80	80
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	20	20	0	0	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	100	100	80	80	80	80
Demand Summary							
Peak Demand (Forecasted)	MW	105	106	107	108	109	109
Firm Power Purchases	MW	38	38	38	38	38	38
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	67	68	69	70	70	71
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	75	76	77	78	79	80
Excess Capacity	MW	25	24	3	2	1	0
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	49.6%	47.6%	16.5%	15.0%	13.5%	12.2%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

KANSAS MUNICIPAL ENERGY AGENCY – EMP2

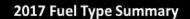


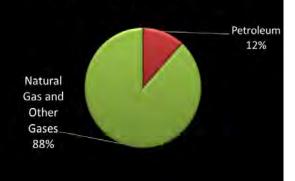
KANSAS MUNICIPAL ENERGY AGENCY – EMP3







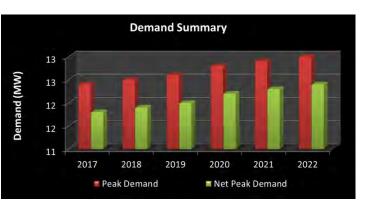


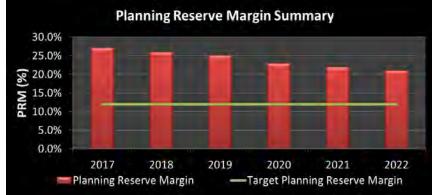


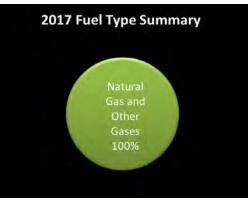
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	80	80	80	80	80	80
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	5	5	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	75	75	80	80	80	80
Demand Summary							
Peak Demand (Forecasted)	MW	82	83	84	85	86	86
Firm Power Purchases	MW	23	23	23	23	23	23
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	60	60	61	62	63	64
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	67	68	69	69	70	71
Excess Capacity	MW	9	8	11	10	10	9
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	26.4%	24.8%	30.5%	28.8%	27.2%	25.7%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%
Schedule JAR-2							

KANSAS MUNICIPAL ENERGY AGENCY – EUDORA









Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	0	0	0	0	0	0
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	15	15	15	15	15	15
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	15	15	15	15	15	15
Demand Summary							
Peak Demand (Forecasted)	MW	12	13	13	13	13	13
Firm Power Purchases	MW	1	1	1	1	1	1
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	12	12	12	12	12	12
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	13	13	13	14	14	14
Excess Capacity	MW	2	2	2	1	1	1
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	27.1%	26.1%	25.0%	23.0%	22.0%	21.0%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

KANSAS MUNICIPAL ENERGY AGENCY – GC







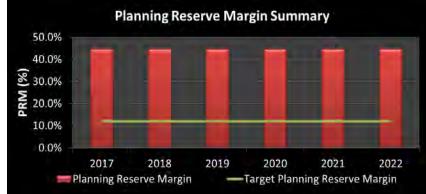
2017 Fuel Type Summary



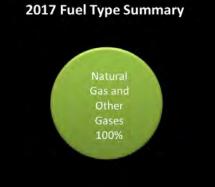
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	27	27	27	27	27	27
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	52	37	27	27	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	79	64	54	54	27	27
Demand Summary							
Peak Demand (Forecasted)	MW	75	78	79	80	81	81
Firm Power Purchases	MW	5	5	2	2	2	2
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	70	72	77	78	78	79
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	78	81	86	87	88	88
Excess Capacity	MW	1	0	0	0	0	0
Deficient Capacity	MW	0	17	32	33	60	61
Planning Reserve Margin	%	13.8%	-11.2%	-29.6%	-30.2%	-65.3%	-65.5%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%
Schedule JAR-2							

KANSAS MUNICIPAL ENERGY AGENCY – MEADE



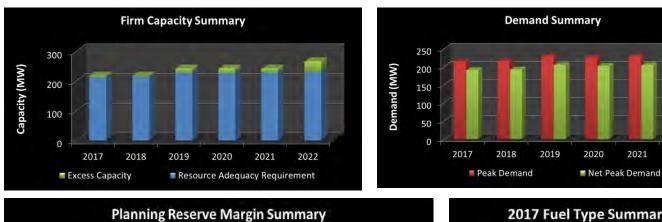


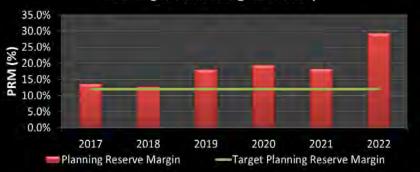
Demand Summary

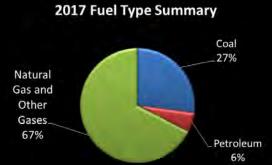


Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	7	7	7	7	7	7
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	7	7	7	7	7	7
Demand Summary							
Peak Demand (Forecasted)	MW	5	5	5	5	5	5
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	5	5	5	5	5	5
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	5	5	5	5	5	5
Excess Capacity	MW	1	1	1	1	1	1
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	44.4%	44.4%	44.4%	44.4%	44.4%	44.4%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

KANSAS POWER POOL



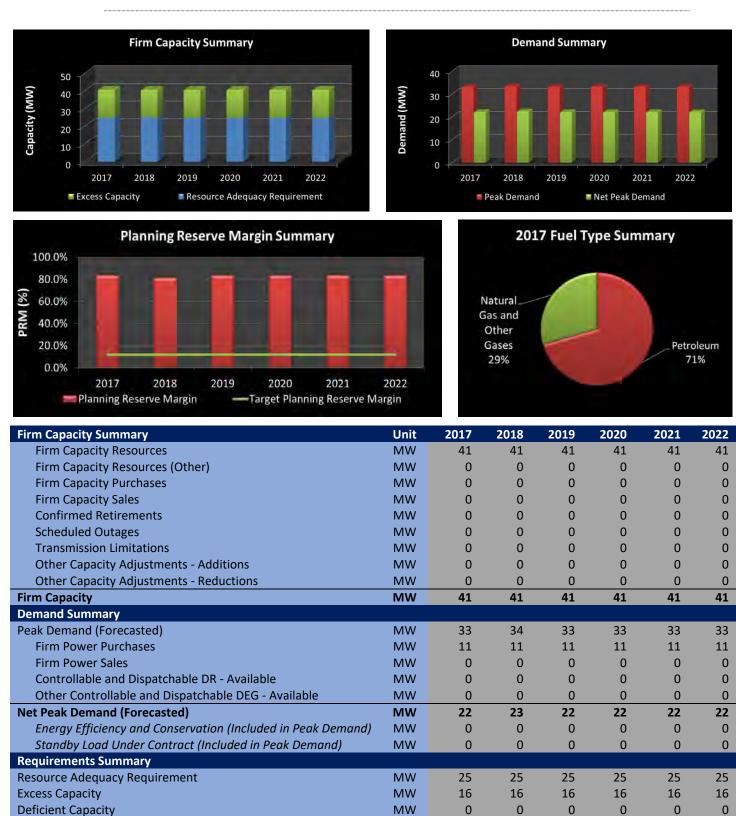




2022

Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	209	209	209	209	209	209
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	59	59	59	59	59	59
Firm Capacity Sales	MW	50	50	25	25	25	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	218	218	243	243	243	268
Demand Summary							
Peak Demand (Forecasted)	MW	215	217	229	227	229	231
Firm Power Purchases	MW	24	24	24	24	24	24
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	192	193	206	203	205	207
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	215	216	230	228	230	232
Excess Capacity	MW	3	1	12	15	13	36
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	13.6%	12.7%	18.0%	19.4%	18.2%	29.3%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%
Calculation 2							

KENNETT BOARD OF PUBLIC WORKS



%

%

83.3%

12.0%

80.9%

12.0%

83.3%

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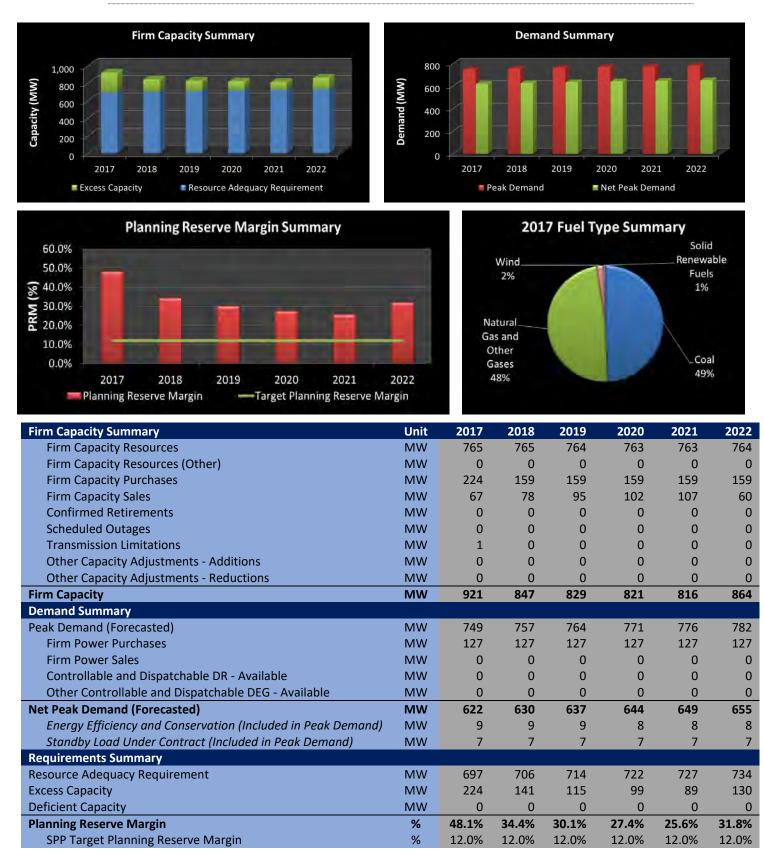
12.0%

Schedule JAR-2

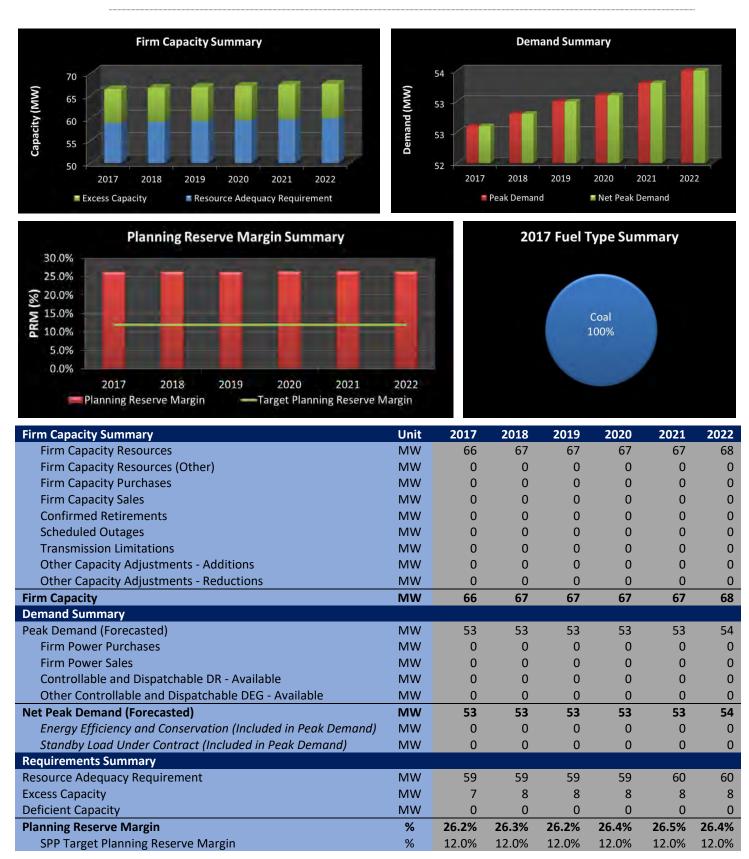
SPP Target Planning Reserve Margin

Planning Reserve Margin

LINCOLN ELECTRIC SYSTEM



MIDAMERICAN ENERGY COMPANY

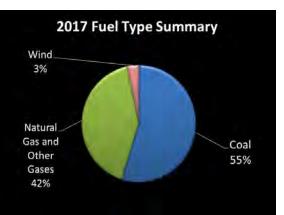


MIDWEST ENERGY







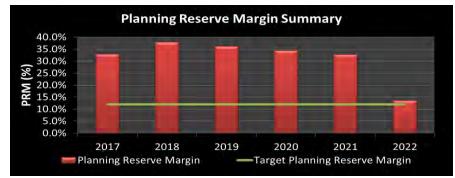


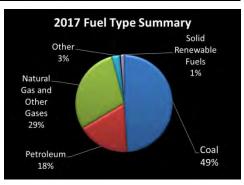
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	115	115	115	115	115	115
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	281	281	276	276	276	276
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	395	395	391	391	391	391
Demand Summary							
Peak Demand (Forecasted)	MW	391	393	398	403	407	411
Firm Power Purchases	MW	6	6	6	6	6	6
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	23	23	24	24	24	24
Other Controllable and Dispatchable DEG - Available	MW	33	33	33	33	33	33
Net Peak Demand (Forecasted)	MW	330	332	336	341	345	349
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	369	372	376	381	386	391
Excess Capacity	MW	26	23	14	9	5	0
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	19.9%	19.0%	16.3%	14.7%	13.3%	11.9%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%
Schedule JAR-2							

MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION



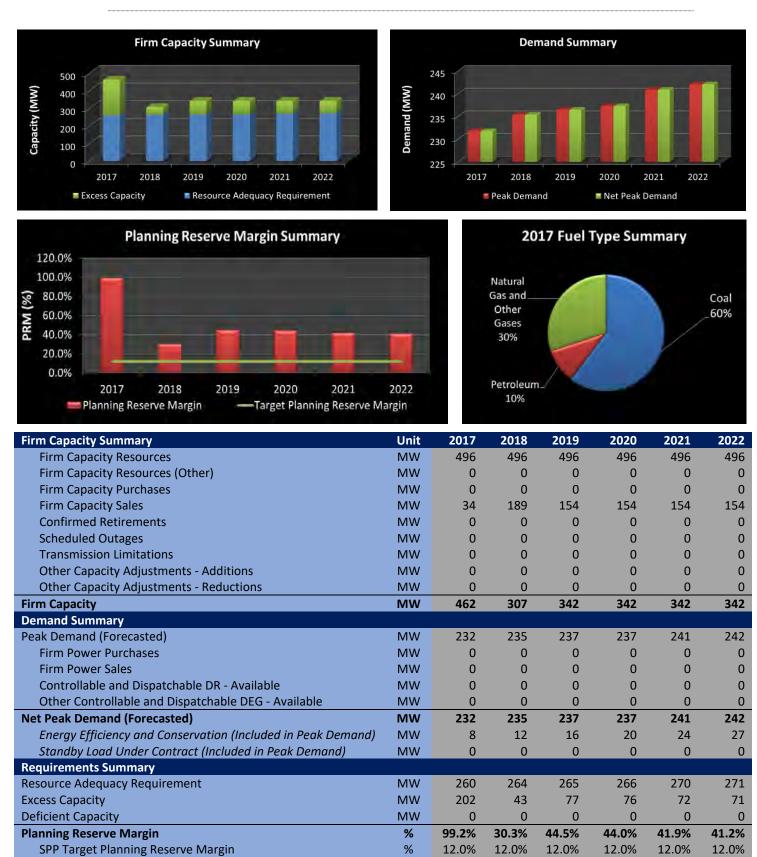






Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	590	590	590	590	590	590
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	206	208	208	208	208	108
Firm Capacity Sales	MW	88	53	53	53	53	53
Confirmed Retirements	MW	16	16	16	16	16	16
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	708	745	745	745	745	645
Demand Summary							
Peak Demand (Forecasted)	MW	557	564	571	578	585	593
Firm Power Purchases	MW	24	24	24	24	24	24
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	534	541	548	555	562	569
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	598	605	613	621	629	637
Excess Capacity	MW	111	140	132	124	116	8
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	32.8%	37.9%	36.1%	34.4%	32.7%	13.5%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

MISSOURI RIVER ENERGY SERVICES



MUNICIPAL ENERGY AGENCY OF NEBRASKA



208 209 210 211 **Net Peak Demand (Forecasted)** MW Energy Efficiency and Conservation (Included in Peak Demand) MW 0 0 0 0 Standby Load Under Contract (Included in Peak Demand) MW 0 0 0 0 **Requirements Summary** MW 233 234 235 236 **Resource Adequacy Requirement Excess Capacity** MW 24 21 19 18 0 0 **Deficient Capacity** MW 0 0 **Planning Reserve Margin** 23.4% 22.0% % 21.1% 20.6% SPP Target Planning Reserve Margin % 12.0% 12.0% 12.0% 12.0%

MW

MW

MW

62

1

0

62

1

0

62

1

0

62

1

0

62

1

0

0

0

237

17

0

20.2%

12.0%

212

62

1

0

0

0

238

16

19.6%

12.0%

0

213

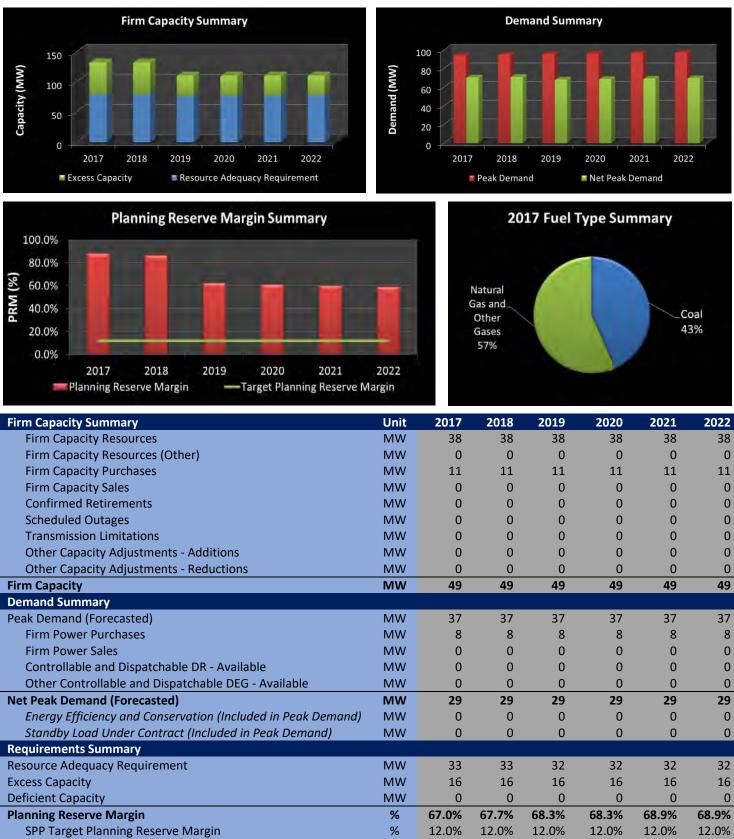
Schedule JAR-2

Controllable and Dispatchable DR - Available

Other Controllable and Dispatchable DEG - Available

Firm Power Sales

NEBRASKA CITY UTILITIES

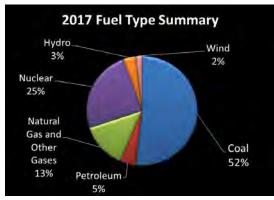


NEBRASKA PUBLIC POWER DISTRICT



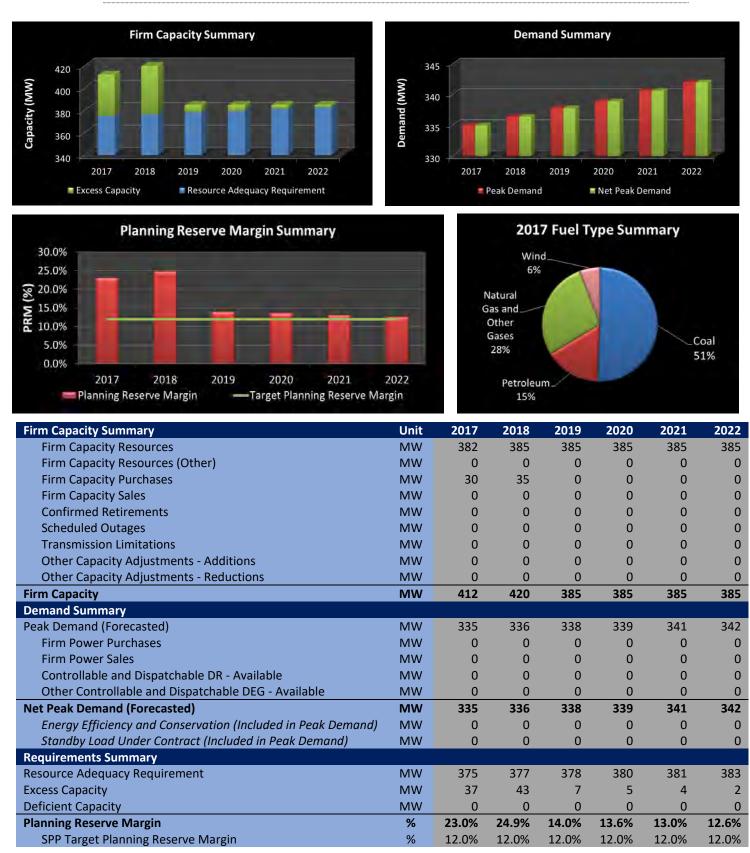




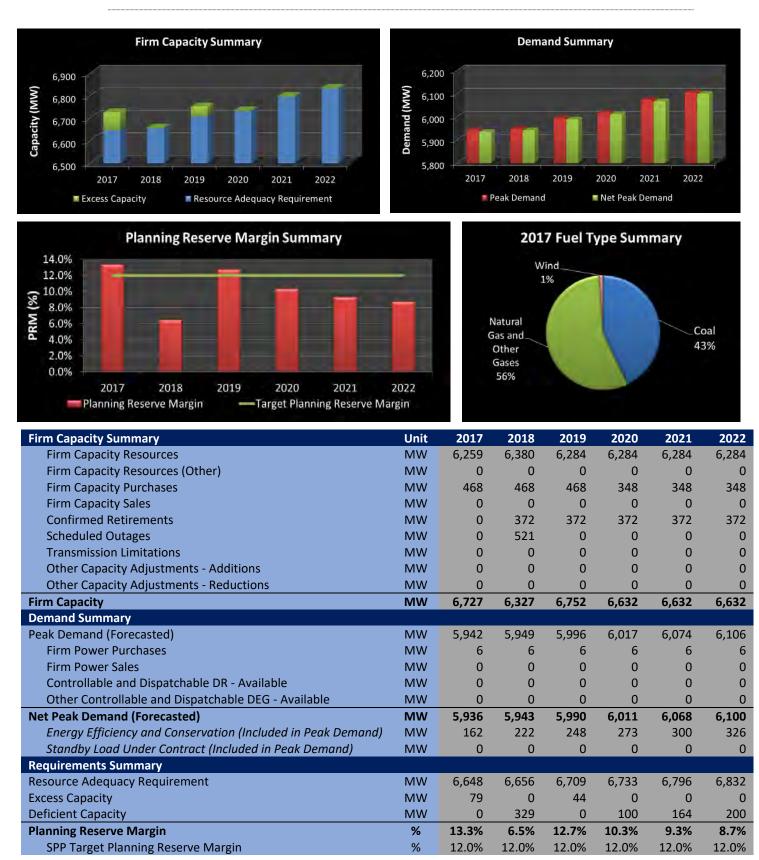


Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	3,072	3,077	3 <i>,</i> 054	3,054	3,054	3,053
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	195	198	198	198	198	198
Firm Capacity Sales	MW	281	191	166	166	166	166
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	10	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	2,976	3,083	3,086	3,086	3,086	3,084
Demand Summary							
Peak Demand (Forecasted)	MW	2,943	2,987	2,925	2,876	2,870	2,854
Firm Power Purchases	MW	473	473	473	473	473	473
Firm Power Sales	MW	35	29	42	19	8	1
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	2,506	2,543	2,493	2,421	2,405	2,381
Energy Efficiency and Conservation (Included in Peak Demand)	MW	4	7	10	13	17	20
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	2,806	2,848	2,792	2,712	2,693	2,667
Excess Capacity	MW	170	236	293	374	393	417
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	18.8%	21.3%	23.8%	27.4%	28.3%	29.5%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

NORTHWESTERN ENERGY



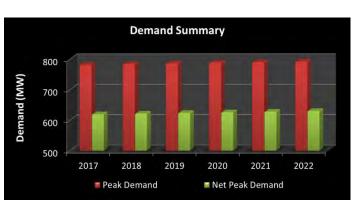
OKLAHOMA GAS & ELECTRIC COMPANY

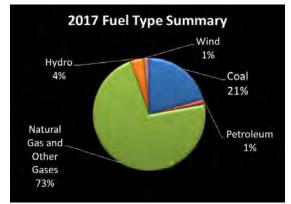


OKLAHOMA MUNICIPAL POWER AUTHORITY



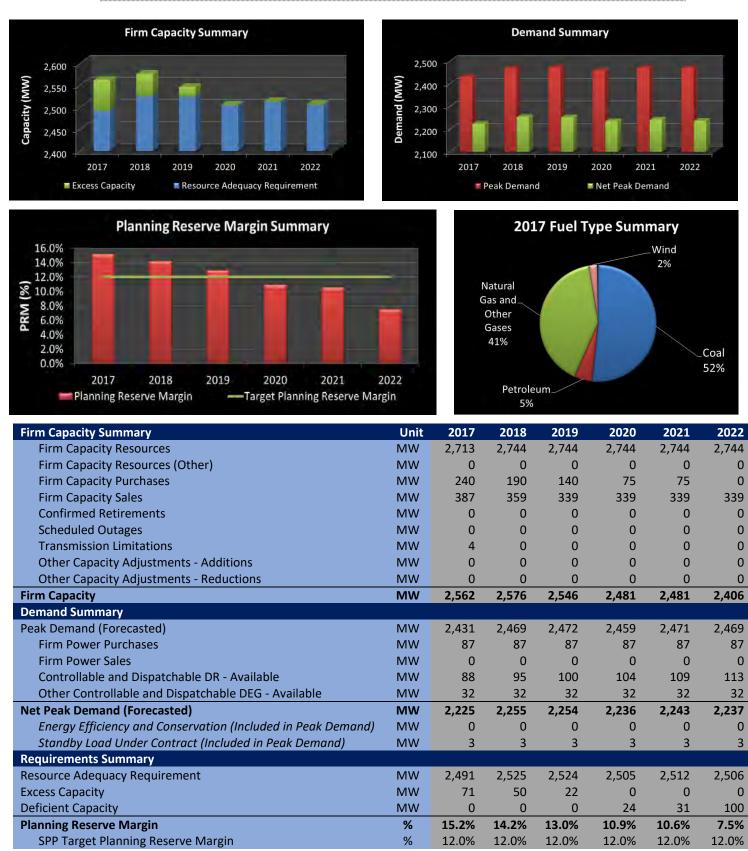




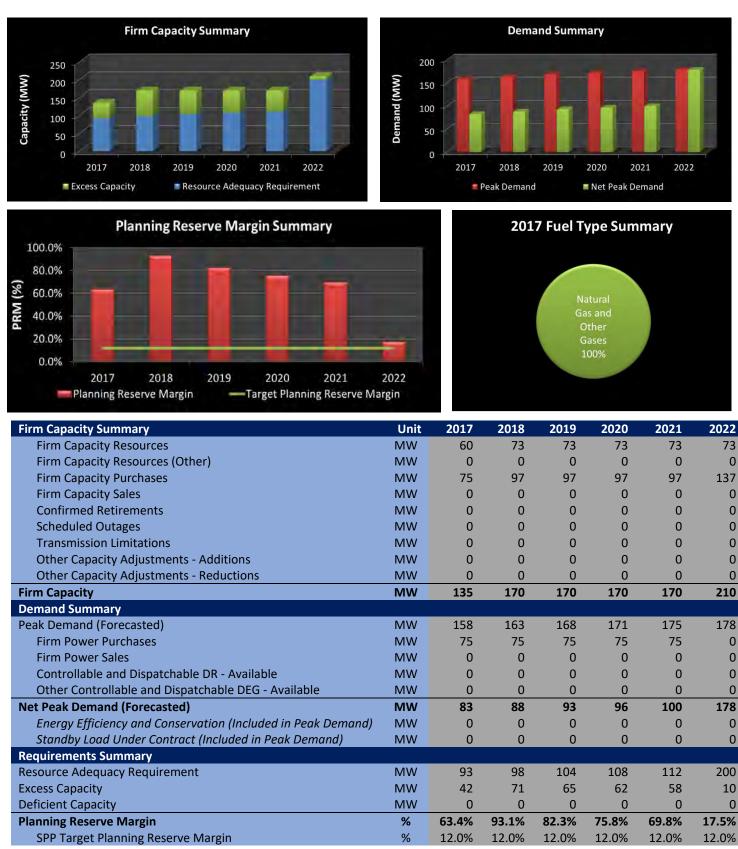


Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	713	713	713	713	713	713
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	59	79	79	79	79	79
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	772	792	792	792	792	792
Demand Summary							
Peak Demand (Forecasted)	MW	782	784	786	788	790	793
Firm Power Purchases	MW	162	162	162	162	162	162
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	620	622	624	626	628	631
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	694	696	699	701	704	706
Excess Capacity	MW	78	95	93	91	88	86
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	24.6%	27.4%	26.9%	26.5%	26.0%	25.6%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

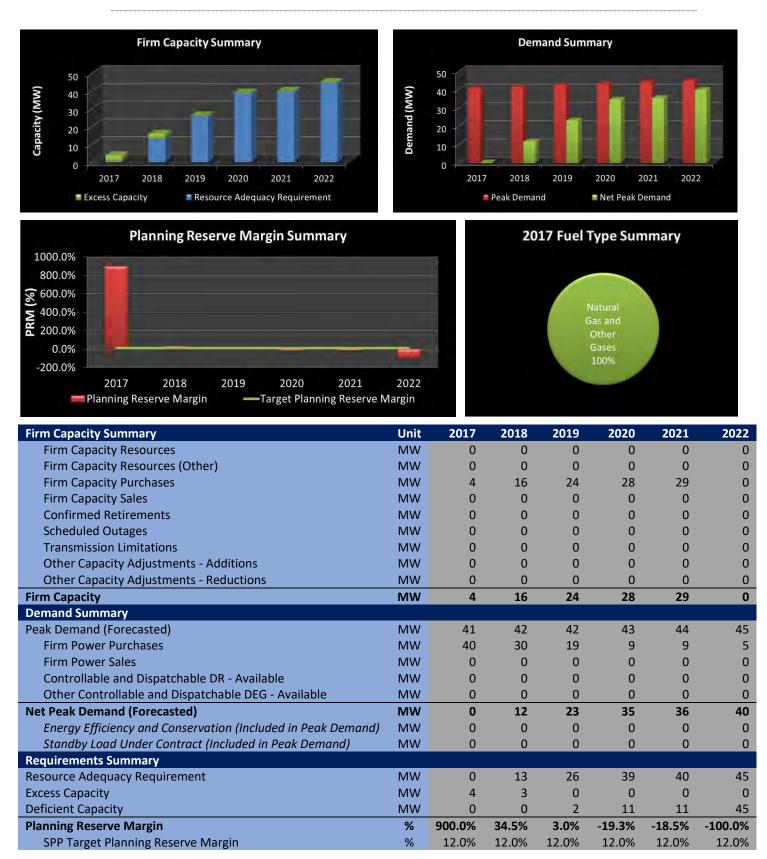
OMAHA PUBLIC POWER DISTRICT



PEOPLE'S ELECTRIC COOPERATIVE



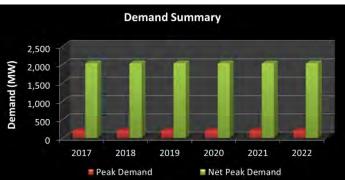
SOUTH SIOUX CITY NEBRASKA

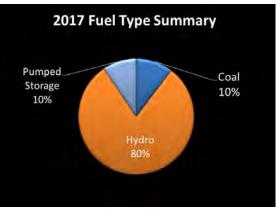


SOUTHWESTERN POWER ADMINISTRATION





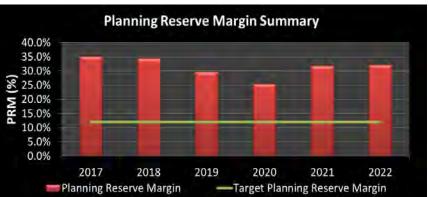




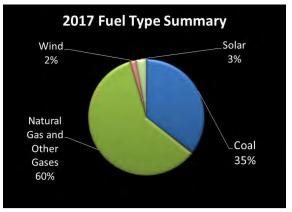
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	2,355	2,355	2,355	2,355	2,355	2,355
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	213	143	143	143	143	143
Firm Capacity Sales	MW	26	26	26	26	26	26
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	194	0	63	0	78	78
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	24	24	22	24	16	14
Firm Capacity	MW	2,325	2,449	2,388	2,449	2,379	2,381
Demand Summary							
Peak Demand (Forecasted)	MW	203	203	203	203	203	203
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	1,832	1,832	1,832	1,832	1,832	1,832
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	2,035	2,035	2,035	2,035	2,035	2,035
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	2,236	2,236	2,236	2,236	2,236	2,236
Excess Capacity	MW	88	213	151	213	143	145
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	14.2%	20.3%	17.3%	20.3%	16.9%	17.0%
SPP Target Planning Reserve Margin	%	9.89%	9.89%	9.89%	9.89%	9.89%	9.89%
Schedule JAR-2							

SOUTHWESTERN PUBLIC SERVICE COMPANY









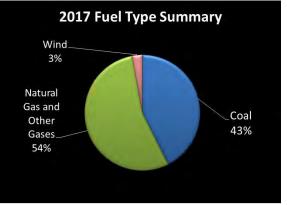
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	4,485	4,485	4,485	4,373	4,283	4,283
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	1,471	1,486	1,083	1,083	1,083	1,083
Firm Capacity Sales	MW	0	0	400	400	0	0
Confirmed Retirements	MW	0	0	0	112	202	202
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	5,956	5,971	5,168	5,056	5,366	5,366
Demand Summary							
Peak Demand (Forecasted)	MW	4,622	4,657	4,205	4,253	4,293	3,963
Firm Power Purchases	MW	171	171	171	171	171	0
Firm Power Sales	MW	0	0	0	0	0	150
Controllable and Dispatchable DR - Available	MW	41	42	43	43	43	44
Other Controllable and Dispatchable DEG - Available	MW	0	2	3	5	6	8
Net Peak Demand (Forecasted)	MW	4,410	4,442	3,988	4,034	4,073	4,061
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	4,939	4,975	4,467	4,518	4,562	4,548
Excess Capacity	MW	1,017	996	701	538	804	818
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	35.1%	34.4%	29.6%	25.3%	31.7%	32.1%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%
Schedule JAR-2							

SUNFLOWER ELECTRIC POWER CORPORATION



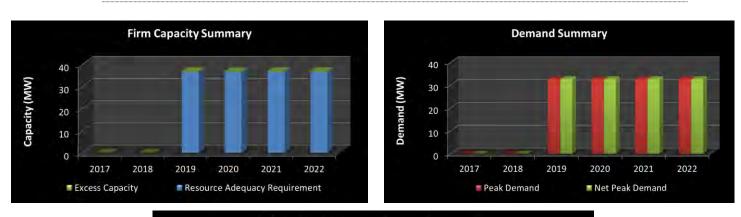


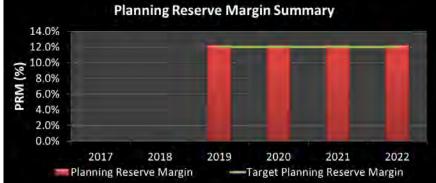




Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	1,061	1,074	1,122	1,122	1,122	1,100
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	188	188	7	7	7	7
Firm Capacity Sales	MW	29	44	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	1,220	1,218	1,129	1,129	1,129	1,107
Demand Summary							
Peak Demand (Forecasted)	MW	973	977	967	974	953	944
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	973	977	967	974	953	944
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	1,090	1,094	1,083	1,091	1,067	1,057
Excess Capacity	MW	131	124	45	38	62	50
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	25.4%	24.7%	16.7%	15.9%	18.5%	17.3%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%
Schedule JAR-2							

WEST TEXAS MUNICIPALS





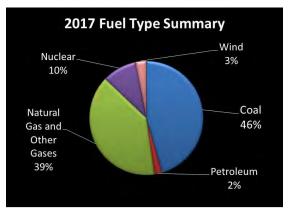
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	0	0	0	0	0	0
Firm Capacity Resources (Other)		0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	37	37	37	37
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	0	0	37	37	37	37
Demand Summary							
Peak Demand (Forecasted)	MW	0	0	33	33	33	33
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	0	0	33	33	33	33
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW			37	37	37	37
Excess Capacity	MW			0	0	0	0
Deficient Capacity	MW			0	0	0	0
Planning Reserve Margin	%			12.2%	12.2%	12.2%	12.2%
SPP Target Planning Reserve Margin	%			12.0%	12.0%	12.0%	12.0%

WESTAR ENERGY









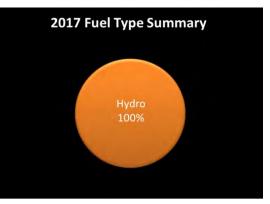
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	6,527	6,527	6,527	6,527	6,527	6,527
Firm Capacity Resources (Other)		0	0	0	0	0	0
Firm Capacity Purchases	MW	433	383	420	355	275	209
Firm Capacity Sales	MW	766	741	604	539	414	364
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	6,194	6,169	6,343	6,343	6,388	6,372
Demand Summary							
Peak Demand (Forecasted)	MW	5,307	5,323	5 <i>,</i> 360	5 <i>,</i> 396	5,441	5,492
Firm Power Purchases	MW	112	112	112	112	112	112
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	244	240	236	231	226	221
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	4,951	4,971	5,012	5,053	5,104	5,159
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	5,545	5,567	5,613	5,659	5,716	5,778
Excess Capacity	MW	649	602	730	684	672	594
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	25.1%	24.1%	26.6%	25.5%	25.2%	23.5%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

WESTERN AREA POWER ADMINISTRATION



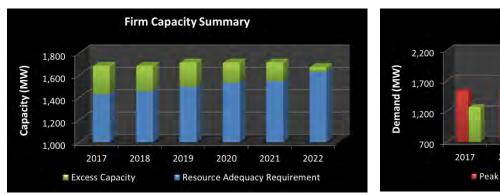






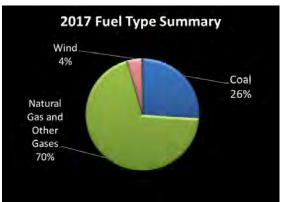
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	2,406	2,406	2,406	2,406	2,406	2,406
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	2	2	2	4	4	4
Firm Capacity Sales	MW	440	440	440	440	440	440
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	45	45	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	301	0	0	0	0	0
Firm Capacity	MW	1,667	1,923	1,923	1,970	1,970	1,970
Demand Summary							
Peak Demand (Forecasted)	MW	738	738	738	738	738	738
Firm Power Purchases	MW	144	144	144	144	144	144
Firm Power Sales	MW	748	748	748	748	748	748
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	1,342	1,342	1,342	1,342	1,342	1,342
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	1,475	1,475	1,475	1,475	1,475	1,475
Excess Capacity	MW	192	448	448	495	495	495
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	24.2%	43.3%	43.3%	46.8%	46.8%	46.8%
SPP Target Planning Reserve Margin	%	9.89%	9.89%	9.89%	9.89%	9.89%	9.89%

WESTERN FARMERS ENERGY SERVICES









Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	1,359	1,359	1,359	1,359	1,359	1,359
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	325	325	355	355	355	355
Firm Capacity Sales	MW	0	0	0	0	0	40
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	1,683	1,683	1,713	1,713	1,713	1,673
Demand Summary							
Peak Demand (Forecasted)	MW	1,537	1,554	1,590	1,601	1,610	2,080
Firm Power Purchases	MW	460	460	460	460	460	610
Firm Power Sales	MW	246	246	246	246	246	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	47	40	40	19	15	15
Net Peak Demand (Forecasted)	MW	1,276	1,300	1,336	1,368	1,381	1,455
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	1,429	1,455	1,496	1,532	1,547	1,630
Excess Capacity	MW	254	228	217	181	167	44
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	31.9%	29.5%	28.2%	25.3%	24.1%	15.0%

ER-2018-0145 and ER-2018-146

KANSAS CITY POWER & LIGHT COMPANY and KANSAS CITY POWER LIGHT GREATER OPERATIONSCOMPANY

SCHEDULE JAR-D-6

HAS BEEN DEEMED

"CONFIDENTIAL"

IN ITS ENTIRETY

Exhibit No.: Issue(s):

Witness/Type of Exhibit: Sponsoring Party: Case No.: Depreciation/ Retirements/ One CIS/ O&M Expense Robinett/Rebuttal Public Counsel ER-2018-0145 and ER-2018-0146

REBUTTAL TESTIMONY

OF

JOHN A. ROBINETT

Submitted on Behalf of the Office of the Public Counsel

KANSAS CITY POWER & LIGHT COMPANY and KCP&L GREATER MISSOURI OPERATIONS COMPANY

Case No. ER-2018-0145 and ER-2018-0146

**

**

Denotes Information that has been redacted

July 27, 2018



BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power &)	
Light Company's Request for Authority)	File No. ER-2018-0145
to Implement a General Rate Increase)	
for Electric Service)	
In the Matter of KCP&L Greater Missouri)	
Operations Company's Request for)	File No. ER-2018-0146
Authority to Implement a General)	
Rate Increase for Electric Service)	

AFFIDAVIT OF JOHN A. ROBINETT

STATE OF MISSOURI)	
)	SS
COUNTY OF COLE)	

John A. Robinett, of lawful age and being first duly sworn, deposes and states:

1. My name is John A. Robinett. I am a Utility Engineering Specialist for the Office of the Public Counsel.

2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.

3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

John A. Robinett Utility Engineering Specialist

Subscribed and sworn to me this 27th day of July 2018.



JERENE A. BUCKMAN My Commission Expires August 23, 2021 Cole County Commission #13754037

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Jerene A. Buckman Notary Public

My Commission expires August 23, 2021.

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REBUTTAL TESTIMONY OF JOHN A. ROBINETT KANSAS CITY POWER AND LIGHT COMPANY

KCP&L - GREATER MISSOURI OPERATIONS COMPANY

CASE Nos. ER-2018-0145 and ER-2018-0146

1	Q.	What is your name and what is your business address?
2	А.	John A. Robinett, PO Box 2230, Jefferson City, Missouri 65102.
3	Q.	By whom are you employed and in what capacity?
4	A.	I am employed by the Missouri Office of the Public Counsel ("OPC") as a Utility Engineering
3 4 5 6 7 8		Specialist.
6	Q.	Are you the same John A. Robinett that filed direct testimony on behalf of the OPC in
7		this proceeding?
8	А.	Yes.
9	Q.	What is the purpose of your rebuttal testimony?
10	A.	I rebut the positions of KCPL, GMO and Staff to include depreciation, operation and
11		maintenance, and property tax expenses related to the known retirements of Kansas City
12		Power & Light Company ("KCPL") Montrose units 2 and 3 to be retired in December of
13		2018, and KCP&L Greater Missouri Operations Company ("GMO") Sibley unit 1 retired
14		June 2017, Sibley unit 2 to be retired in December of 2018. Additionally I rebut the positions
15		of Staff witness Mr. Cary G. Featherstone, and KCPL and GMO witnesses Mr. Charles A.
16		Caisley, Mr. Forrest Archibald and Mr. Ronald A. Klote regarding the allocation of ONE CIS
17		costs between GMO, KCPL-MO and KCPL-KS.
18	Q.	Would you briefly summarize OPC's recommendations provided in your testimony?
19	А.	OPC offers the following recommendations in this testimony:
20		1) All costs associated with the retirements of KCPL's Montrose units 2, 3, and common
21		plant, and GMO's Sibley units 1 and 2 not be included in the respective costs of service of
22		KPCL and GMO used for setting rates in these cases as these units will be retired by the end
23		of 2018.

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2) The \$7.2 million additional amortization related to depreciation expense for GMO be stopped. The amount collected for the additional amortization related to depreciation expense be booked to the reserves of the Sibley facilities.

3) A decrease in depreciation expense for KCPL related to the Montrose units 2, 3, and common plant retirements of \$3,126,768 based on depreciation expense of true-up accounting schedules from Case No. ER-2018-0145.

4) A decrease in depreciation expense for GMO related to the Sibley units 1 and 2 retirements of \$1,114,733 based on depreciation expense of direct accounting schedules from Case No. ER-2018-0146.

5) All operations and maintenance expenses for KCPL Montrose units 2, 3, and common plant, and GMO Sibley units 1 and 2 should not be included in the costs of service of KPCL and GMO used for setting rates in these cases.

6) As GMO and Staff have done, all operations and maintenance expenses, depreciation expenses, and property taxes for Sibley unit 3, Sibley common plant, and Sibley unit 1 boiler be included in GMO's cost of service used for setting rates, provided that the Commission finds it imprudent for GMO to retire this unit by the end of 2018.

However, if the Commission finds it prudent for GMO to retire Sibley unit 3 by the end of 2018, then all operations and maintenance expenses, depreciation expenses, and property taxes for Sibley unit 3, Sibley common plant, and Sibley unit 1 boiler be excluded from, and all costs associated with the retirement of GMO's Sibley unit 3, Sibley common plant, and Sibley unit 1 boiler be included in GMO's cost of service used for setting rates.

Rebuttal Testimony of John A. Robinett Case No. ER-2018-0145

1	Coal Unit Retirements		
2	Q.	Did GMO retire Sibley unit 1?	
3 4	A.	Yes. As discussed in KCP&L Witness Mr. Crawford's direct testimony in Case No. ER-2018-0146, GMO Retired Sibley unit 1 as of June 1, 2017. ¹	
5	Q.	Did GMO and Staff retire Sibley unit 1 for purposes of the fuel run?	
6	A.	Yes. Sibley unit 1 was excluded from the fuel runs of both Staff and GMO.	
7	Q.	Did GMO and Staff retire Sibley unit 1 from plant in service?	
8 9 10 11 12 13	Α.	No. GMO has included in plant-in-service for Sibley unit 1 \$471,432,875. Staff has included in plant-in-service for Sibley unit 1 \$477,454,785. GMO witness Mr. Crawford does state in his direct testimony that the boiler from unit 1 has remained in service to provide start-up steam for Sibley unit 3. Even if the boiler is still operating, if Sibley unit 1 is no longer producing electricity, then the plant-in-service in account 344 generator equipment should have been retired.	
14	Q.	Have KCPL and GMO publically announced retirements of generation plants?	
15 16	A.	Yes. Attached as Schedule JAR-R-1 to this rebuttal testimony are selected excerpts from Great Plains Energy's form 10K for calendar year 2017.	
17	Q.	Are these retirements known and measurable?	
18	A.	Yes. Great Plains Energy announced them publically in its 2017 10K. GMO and KCPL know	
19		and can calculate at the time of true-up (June 30, 2018) in this case the effect of the retirements	
20		of the units on each utility.	
21	Q.	KCP&L witness Mr. Crawford testifies at page 8 of his direct testimony that it is	
22		appropriate to normalize KPCL's and GMO's generating capacities in these cases. Does	
23		OPC agree?	
24	A.	Yes. However, KCP&L does not normalize KCPL's or GMO's generating capacity to account	
25		for its announced coal unit retirements of KCPL Montrose units 2 and 3, and GMO Sibley	
26		units 1 and 2, by the end of 2018. These retirement dates are outside of the true-up period,	
27		but potentially are only 2 days after the projected effective dates of new rates in these cases.	
28		KCP&L is asking that its ratepayers to potentially pay four years' worth of depreciation	

¹ Case No. ER-2018-0146 GMO witness Mr. Burton L. Crawford direct testimony Page 8 lines 16-22.

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expense, return on the investment, property taxes, and operations and maintenance expense for potentially only 2 days of actual value provided until next rates would need to be set to continue KCPL's and GMO's fuel adjustment clauses.

Q. Do KCP&L's capacity and maintenance normalizations reflect the impending retirements of KCPL Montrose units 2 and 3, and GMO Sibley units 1, 2, and 3?

A. No. Attached as Schedule JAR-R-2C is the confidential schedules BLC-3 and BLC-5 attached to Mr. Crawford's direct testimony for KCPL that provide the maintenance schedule normalization of the expected generation for 2019 through 2022. Also attached as Schedule JAR-R-3C are the confidential schedules BLC-3 and BLC-5 attached to Mr. Crawford's direct testimony for GMO that provide the maintenance schedule normalization of the expected generation for 2019-2022. Confidential schedule BLC-5 for both KCPL and GMO provide the maintenance schedule normalization of the expected generation for 2019 through 2022.

Q. Why does OPC take issue with Schedules BLC-3 and BLC-5 attached to Mr. Crawford's direct testimony for KCPL and GMO?

A. One, schedule BLC-3 is the maintenance normalization schedule OPC takes issue with 15 building in 6 year major maintenance on Montrose unit 2 and 3, and Sibley unit 2 when 16 KCP&L has publically announced the retirement of those units by December 31, 2018. 17 Inclusion of maintenance expense does not tie to the decision to retire the units. Additionally, 18 19 maintenance of those units conflicts with confidential schedule BLC-5 which provides the projected generation from facilities during 2019 through 2022. Those schedules indicate, as 20 21 KCP&L has announced, that Montrose units 2 and 3, and Sibley unit 2 will be retired at the end of 2018 and produce no electricity afterward. It is improper for KCP&L to include 22 maintenance expense in its case when it has indicated from a production standpoint that no 23 generation will occur at those facilities. 24

Q. Is it then OPC's position that KCP&L's capacity normalizations should have reflected the impending retirements of KCPL Montrose units 2 and 3, and GMO Sibley units 1, 2, and 3?

Rebuttal Testimony of John A. Robinett Case No. ER-2018-0145

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A. Yes. It is OPC position that the normalizations should have included the impending retirements of Montrose units 2, 3, and common plant, and Sibley units 1 and 2, but not the impending retirement of Sibley unit 3, because OPC believes that prematurely retiring Sibley unit 3 by the end of this year is imprudent.

KCPL and GMO Depreciation Recommendation

Q. What did KCPL, GMO, and Staff recommend for depreciation expense?

A. All three parties recommend continued use of depreciation expense, which includes depreciation expense for KCPL Montrose units 2 and 3 as well as GMO Sibley units 1, and 2, which have been announced to retire by the end of 2018.

10Q.Is it appropriate to continue to collect depreciation expense for units that are11projected to retire by the end of this year?

A. No. Unless the Commission applies a tracker to ensure that ratepayers receive full credit
for all expenses they are being asked to pay that are built in to these two cases that relate
to these imminent announced retirements to occur by end of 2018.

Q. What is the value of OPC recommendation to remove depreciation expense for the Montrose and Sibley facilities?

A. OPC recommended decrease in depreciation expense is based on Staff's accounting schedules filed with its Cost of Service Report in cases ER-2018-0145 and ER-2018-0146.
In OPC's direct case OPC relied on depreciation expense from the 2016 rate cases of KCPL and GMO. OPC recommends a decrease of \$3,126,768 for KCPL to recognize that Montrose units 2, 3, and common plant will be retired by end of 2018. OPC recommends a decrease of \$1,114,733 for GMO to recognize that Sibley unit 1(retired June 2017, unit 1 boiler still in service), 2 will be retired by end of 2018.

1	KCPL Operations and Maintenance Expense		
2	Q.	What is Staff's and KCPL's position on operations and maintenance expense for the	
3		Montrose units?	
4 5	А.	Both Staff and KCPL are including ongoing operations and maintenance expense in their direct case filings.	
6	Q.	What is OPC's position on operations and maintenance expense for the Montrose	
7		units?	
8	А.	Consistent with OPC's position on depreciation expense, for the Montrose units and	
9		Montrose common plant that will be retired by the end of 2018, no operations or	
10		maintenance expense should be included in the costs of service used for setting rates in	
11		these cases.	
12	Q.	Why should the costs of service for KCPL not include operations and maintenance	
13		expense for Montrose?	
14	А	Based on the applications, new rates are projected to become effective December 29, 2018.	
15		When paired with the announcement of the retirements of the Montrose units and Montrose	
16		common plant by the end of 2018, the longest the units could be operating under new rates	
17		is two days. It is very likely that by the time new rates from these cases are effective the	
18		units will be retired. Ratepayers should not be asked to pay for operations and maintenance	
19		expense on units if KCPL intends to no longer use and will not provide a benefit to the rate	
20		payers.	
21	CMC	Operations and Maintenance Expense	
21			
22	Q.	What is Staff's and GMO's position on operations and maintenance expense for the	
23		Sibley units 1 and 2?	
24 25 26 27	A.	Both Staff and GMO are including ongoing operations and maintenance expense in their direct case filings.	
26	Q.	What is OPC's position on operations and maintenance expense for the Sibley units	
27		1and 2?	
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A. Consistent with OPC's position on depreciation expense, for the Sibley units 1 and 2 that
 will be retired by the end of 2018, it is OPC's recommendation that no operations or
 maintenance expense should be included in the costs of service used for setting rates in
 these cases.

Q. Why should the costs of service for GMO not include operations and maintenance expense for Sibley units 1 and 2?

A Based on the applications, new rates are projected to become effective December 29, 2018. When paired with the announcement of the retirements of the Sibley units1 and 2 by the end of 2018, the longest the units could be operating under new rates is two days. It is very likely that by the time new rates from these cases are effective the units will have been retired. Ratepayers should not be asked to pay for operations and maintenance expense on units that are no longer used and are not providing a benefit.

GMO Sibley Unit 3

Q. Why does OPC believe that prematurely retiring Sibley unit 3 by the end of this year is imprudent and, therefore, Sibley 3 should be included as an available unit for purposes of normalizing GMO's generating capacity?

A. KCP&L witness Mr. Crawford provided the results of the most recent heat rate tests for GMO's generating units in Confidential Schedule BLC-6 to his direct testimony. Attached as Schedule JAR-R-4C to this testimony is that same confidential schedule. Review of this schedule shows that Iatan units 1 and 2 are the only GMO units that are more efficient than Sibley unit 3.² Additionally, when the heat rate test results are analyzed with the fuel runs performed by Staff, a clear image of how important Sibley unit 3 is to GMO ratepayers is produced. Attached as Schedule JAR-R-5C is the GMO fuel run summary sheet provided as a work paper by Staff supporting its fuel expense in its direct case. The fuel run summary sheet indicates how much generation, given assumptions used by Staff, each generating

² Confidential Schedule BLC-6 also indicates Lake Road unit 1 is more efficient than Sibley unit 3 however, Lake Road unit 1 does not produce electricity used for steam service.

Rebuttal Testimony of John A. Robinett Case No. ER-2018-0145

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unit would run with these normalized inputs. Review of the summary indicates that Staff's models more generation from Sibley unit 3 than Iatan 1 or Iatan 2 or any other generating unit that GMO has control or ownership stake in.

Additionally, GMO's fuel run provided in its direct work papers shows GMO purchasing energy from the Southwest Power Pool (SPP) markets to meet almost 38% of its native load's energy requirements. Similarly, Staff's fuel run shows 39% of GMO's total owned generation came from Sibley unit 3. With the retirements of Sibley units 1, 2, and 3, GMO will need to purchase even more energy from the SPP markets increasing its and its customers exposure to the fluctuations and risks of those markets.

However, if the Commission views that GMO retiring Sibley 3 by the end of 2018 is prudent, then Sibley 3 should not be included as GMO-owned capacity when normalizing GMO's generating capacity.

Q. Based on the fuel runs provided in work papers to Staff's and GMO's direct testimony how many hours was Sibley unit 3 price less than the market value?

A. OPC analyzed the number of hours that the price of Sibley Unit 3 produced by Staff's calculations was lower than the cleared market price for every hour of the test year. OPC using Staff's price of Sibley unit 3 also compared it to the market prices provided by KCP&L. The number of hours in a year is 8,760. The results of OPC's analysis on Staff's fuel run and market prices showed that Sibley unit 3 price to run was cheaper than the market clearing cost 6,342 hours or 72.4% of the year. Using that same information for Sibley unit 3 price, but comparing with KCP&L market prices for the hourly clearing for the year, Sibley unit 3 was cheaper than the market clearing price 7,619 hours or 86.97% of the year.

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Q. What should the Commission find related to Sibley unit 3?

A. OPC requests the Commission find that the retirement of Sibley unit 3 is imprudent as it does
not protect rate payers from market volatility and is a crucial unit for ratepayers and GMO.
As shown above the cost of Sibley unit 3 operating using either Staff or KCP&L market prices
is cheaper than the market. Sibley unit 3 produced the more energy than any other GMO

generating unit last year. Sibley unit 3 generated 39% of GMO's native power generated last year. Additionally as stated earlier Sibley unit 3 is more efficient than any other units that GMO has an ownership stake in with the exception of Iatan units 1 and 2.

Q. If the Commission determines that the retirement of Sibley unit 3 is in the best interest of ratepayers, does OPC have recommendations?

A. Yes. The Commission should, as OPC recommends for other retiring units, remove all depreciation expense for Sibley unit 3, Sibley common plant, and Sibley unit 1 boiler from this current case, and remove all operations and maintenance expense from this case. The 8 Commission should rebase the fuel run with the retiring units excluded from the modeling. If the Commission determines that removal of those expenses is not proper in this case the Commission needs to order a tracker for the expenses approved. The tracker will begin tracking expenses built into rates related to depreciation expense (\$6,643,863 for Sibley unit 3, \$1,962,603 for Sibley common plant, \$626,337 for Sibley unit 1 boiler), operations and maintenance expenses, and property taxes, but GMO and KCPL are no longer required to expend or book once units are retired.

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Will future prudence audits occur? Q.

OPC is making a clear statement for future prudence reviews. OPC states that retiring Sibley A. unit 3 by the end of 2018 is an imprudent decision of GMO. OPC intends to raise this issue now so that it is clear in future fuel adjustment clause (FAC) prudence cases OPC will be reviewing the market prices and imputing the difference as if Sibley unit 3 remained inservice. OPC as part of this case is reserving the right and opportunity to challenge in future FAC if the fuel costs increase due to the retirement of Sibley unit 3 when compared to the fuel base established in this case.

GMO Additional Amortization 24

> 0. What language was included in the Stipulation and Agreement in Case No. ER-2016-0156 for the additional amortization related to depreciation expense?

Rebuttal Testimony of John A. Robinett Case No. ER-2018-0145

1	A.	The language from the Stipulation and Agreement in Case No. ER-2016-0156 for the
2		additional amortization related to depreciation expense is as follows:
3 4 5 6 7 8 9 10 11		In addition to the attached schedule, GMO shall be allowed to collect an annual amortization amount equal to \$7.2 million. This additional amortization shall be booked and accounted for on an annual basis until GMO's next general electric rate case. In GMO's next filed rate case the Commission will determine the distribution of the additional amortization. The balance will be used to cover any deficiencies in reserves across production, transmission and distribution accounts. Any undisturbed balance will be used as an offset to future rate base. This amortization is for purpose of settlement of this case only and does not constitute an agreement as to the methodology or a precedent for any future rate case.
12	Q.	What was Staff's recommendation for the GMO additional amortization related to
13		depreciation expense the Commission granted as part of its approval of the
14		Stipulation and Agreement in Case No. ER-2016-0156?
15	А.	Staff witness Mr. Stephen Moilanen at page 156 of the Staff Report Cost of Service in Case
16		No. ER-2018-0146 recommends ceasing the collection of the additional amortization
17		related to depreciation expense in this case.
18	Q.	Is OPC supportive of Staff's recommendation related to the GMO additional
18 19	Q.	Is OPC supportive of Staff's recommendation related to the GMO additional amortization granted as part of the Stipulation and Agreement in Case No. ER-2016-
	Q.	
19	Q. A.	amortization granted as part of the Stipulation and Agreement in Case No. ER-2016-
19 20		amortization granted as part of the Stipulation and Agreement in Case No. ER-2016- 0156?
19 20 21		amortization granted as part of the Stipulation and Agreement in Case No. ER-2016-0156?In part. OPC does agree and provided the direct position that the additional amortization
19 20 21 22		amortization granted as part of the Stipulation and Agreement in Case No. ER-2016-0156?In part. OPC does agree and provided the direct position that the additional amortization related to depreciation expense should be removed. However, Staff failed to provide a
 19 20 21 22 23 24 25 26 27 28 29 30 		amortization granted as part of the Stipulation and Agreement in Case No. ER-2016- 0156? In part. OPC does agree and provided the direct position that the additional amortization related to depreciation expense should be removed. However, Staff failed to provide a position in direct to address the distribution of the additional amortization. Mr. Moilanen discusses the stipulation and provides the following recommendation on page 156: Staff in this case recommends ceasing collection of the additional amortized expense of \$7.2 million. The language provided in the Stipulation indicates the amount is to be collected until GMO's next rate case. In addition, Staff recommends the Commission wait until the next filed general rate case (at which time the Company has committed to submitting a new depreciation study of plant assets) ⁸⁴ to consider the collected amortized amount for distribution to plant accounts.
 19 20 21 22 23 24 25 26 27 28 29 		 amortization granted as part of the Stipulation and Agreement in Case No. ER-2016-0156? In part. OPC does agree and provided the direct position that the additional amortization related to depreciation expense should be removed. However, Staff failed to provide a position in direct to address the distribution of the additional amortization. Mr. Moilanen discusses the stipulation and provides the following recommendation on page 156: Staff in this case recommends ceasing collection of the additional amortized expense of \$7.2 million. The language provided in the Stipulation indicates the amount is to be collected until GMO's next rate case. In addition, Staff recommends the Commission wait until the next filed general rate case (at which time the Company has committed to submitting a new depreciation study of plant assets)⁸⁴

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where a new depreciation study is performed. Staff however is not recommending the same treatment as GMO. Staff recommended the removal of the additional amortization. Staff's recommendation is inconsistent with the stipulation's plain language related to the distribution of the funds collected under the additional amortization. OPC is the only party to properly address the stipulation for the additional amortization related to depreciation expense.

Q. What is KCPL's rationale for continuing the additional amortization and dealing with distribution of collection in the next general rate proceeding following this current case?

A Mr. Klote provides the following position and evidence for continuation of the additional amortization:

The rates from the 2016 case including the additional amortization have only been in effect a short period of time since February 22, 2017. The Company believes the methodology provided in that case is still applicable for the test period and true-up periods in this rate case and should be continued until the filing of the Company's next general rate case which will include a new depreciation study.

However, OPC received in a response to data requests a response that may better fit GMO's request to handle the funds collected at the time a new depreciation study is performed. In response to OPC data request 8521(GMO) and 8522(KCPL) provided the following response related to depreciation reserve:

Generating unit reserve amounts as listed in the data request are not the same as would be determined via a depreciation study. A depreciation study is required to derive a more accurate reserve balance. The depreciation study would analyze asset remaining life, cost of removal and salvage parameters, etc. to develop the appropriate reserve balance. The Company did not perform a depreciation study for this rate case.

KCPL provided an Excel spread sheet that provided depreciation reserve estimated by Federal Energy Regulatory Commission (FERC) account and sub-account, by generating unit. The following two notes are provided in the Excel file titled, "Q8522_KCPL MO Plant and Cost of Removal."

1		Note:
2		Production plant depreciation reserve is not maintained by individual generating unit, except for Iatan Unit 2 and Hawthorn Unit 5.
_		Depreciation reserve reported in the schedule above has been allocated to each generating
3		unit, except for Iatan Unit 2 and Hawthorn Unit 5.
4		Additionally GMO provided an Excel spread sheet that provided depreciation reserve
5		estimated by FERC account and sub-account, by generating unit. The following two notes
6		are provided in the Excel file titled, "Q8521_GMO_OPC-8521 Generation Plant and
7		Reserves and COR December 2017."
		Note: Production plant depreciation reserve is not maintained by individual generating unit, except for Iatan Unit 2 and Solar.
		Depreciation reserve reported in the schedule above has been allocated to each generating unit, except for Iatan Unit 2 and Solar.
8		OPC believes that KCPL and GMO's internal personnel should have the expertise
9		necessary for these calculations, and the issue should not be postponed to a subsequent
10		case.
11	Q.	What is OPC's position on this additional amortization?
12	A.	OPC requests that the Commission discontinue its authorization of the additional
13		amortization for depreciation expense of \$7.2 million, and by removing the \$7.2 million
14		additional amortization from revenue requirement going forward. As part of the stipulation
15		and agreement the additional amortization was to be in place until rates were set in the next
16		rate case-this case; also as part of that next rate case parties were to recommend where
17		the dollars collected as additional depreciation expense should be booked. OPC requests
18		that the Commission order GMO to record all additional depreciation expense received
19		through the additional amortization of \$7.2 million since its last rate case as reserve
20		additions to the FERC subaccounts for the Sibley generation facilities.

1	ONE CIS Allocation		
2	Q.	What was Staff's Position related to the ONE CIS allocation?	
3	А.	Staff Witness Mr. Featherstone in the Staff Revenue Requirement Cost of Service Report	
4		states:	
5 6 7 8		The costs of the new customer service system will be included in the true-up ending June 30, 2018 and will be assigned to KCPL, split between its Kansas and Missouri customers, and GMO. The costs will be allocated approximately one third each between KCPL Kansas, KCPL Missouri, and GMO. ³	
9	Q.	Did KCPL and GMO discuss the allocation of the ONE CIS solution costs?	
10	A.	No. Neither of KCPL and GMO witnesses Mr. Caisley or Mr. Archibald, who both	
11		discussed the ONE CIS system, addressed the allocation of the system costs between	
12		KCPL-KS, KCPL-MO and GMO. GMO and KCPL witness Mr. Klote discussed	
13		adjustments for plant in service and reserves at page 10 of his direct testimony. Mr. Klote	
14		states that the projected costs for ONE CIS have been included in the plant-in-service	
15		estimates in this case.	
16	Q.	Which adjustment reflects ONE CIS solution?	
17	А.	RB-20, one for KCPL and one for GMO	
18	Q.	Does adjustment RB-20 reflect ONE CIS costs allocated to both KCPL and GMO?	
19	А.	No. There is insufficient plant adjustment in RB-20 on the GMO schedule to account for	
20		allocation of plant balance related to ONE CIS being placed in service. KCPL adjustment	
21		RB-20 is an addition of approximately \$113 million which is slightly less than the projected	
22		values of \$118 million in the original control budget.	
23	Q.	What is OPC's position related to ONE CIS solution?	
24	A.	OPC seeks to allocate the costs that are fair and just for Missouri ratepayers. OPC's	
25		position is supportive of the Staff position but with conditions. OPC recommends a tracker	
26		related to the expenses and future allocations of the ONE CIS system in order to assure that	

³ Case No. ER-2018-0145 and ER-2018-0146, Staff Revenue Requirement Cost of Service Report, Page 152 Lines 20-23.

Missouri ratepayer dollars paid to KCPL and GMO for return of the asset cost are not 1 transferred to other affiliated entities. 2 Q. Would you briefly summarize OPC's recommendations provided in your testimony? 3 4 A. OPC offers the following recommendations in this testimony: 5 1) All costs associated with the retirements of KCPL's Montrose units 2, 3, and common plant, and GMO's Sibley units 1, 2, and common plant not be included in the costs of service 6 7 of KPCL and GMO used for setting rates in these cases as these units will be retired by end 8 of 2018. 9 2) The \$7.2 million additional amortization related to depreciation expense for GMO be 10 stopped. The amount collected for the additional amortization related to depreciation expense be booked to the reserves of the Sibley facilities. 11 3) A decrease in depreciation expense for KCPL related to the Montrose units 2, 3, and 12 common plant retirements of \$3,126,768 based on depreciation expense of true-up accounting 13 14 schedules from Case No. ER-2018-0145. 15 4) A decrease in depreciation expense for GMO related to the Sibley units 1 and 2 retirements of \$1,114,733 based on depreciation expense of direct accounting schedules from 16 Case No. ER-2018-0146. 17 5) All operations and maintenance expenses for KCPL Montrose units 2, 3, and common 18 plant and GMO Sibley unit 1, 2, and common plant should not be included in the costs of 19 20 service of KPCL and GMO used for setting rates in these cases. 21 6) As GMO and Staff have done, all operations and maintenance expenses, depreciation expenses, and property taxes for Sibley unit 3, Sibley common plant, and Sibley unit 1 boiler 22 be included in GMO's cost of service used for setting rates, provided that the Commission 23 finds it imprudent for GMO to retire this unit by the end of 2018. 24

Rebuttal Testimony of John A. Robinett Case No. ER-2018-0145

ER-2018-0146

However, if the Commission finds it prudent for GMO to retire Sibley unit 3 by the end of 2018, then all operations and maintenance expenses, depreciation expenses, and property taxes for Sibley unit 3, Sibley common plant, and Sibley unit 1 boiler be excluded from, and all costs associated with the retirement of GMO's Sibley unit 3, Sibley common plant, and Sibley unit 1 boiler be included in GMO's cost of service used for setting rates.

Q. Does this conclude your rebuttal testimony?

A. Yes, it does.

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merger, and Merger Sub will merge with and into Westar, with Westar surviving such merger. Upon closing, pursuant to the Amended Merger Agreement, each outstanding share of Great Plains Energy's and Westar's common stock will be converted into the right to receive 0.5981 and 1.0, respectively, of validly issued, fully paid and nonassessable shares of common stock, no par value, of Holdco. Following the mergers, Holdco, with a new name that has yet to be established, will be the parent of Great Plains Energy's direct subsidiaries, including KCP&L, and Westar.

The anticipated merger has been structured as a merger of equals in a tax-free exchange of shares that involves no premium paid or received with respect to either Great Plains Energy or Westar. Following the completion of the anticipated merger, Westar shareholders will own approximately 52.5 percent and Great Plains Energy shareholders will own approximately 47.5 percent of the combined company.

Great Plains Energy's anticipated merger with Westar was unanimously approved by the Great Plains Energy Board and Westar Board of Directors, has received the approvals of each of Great Plains Energy's and Westar's shareholders and has received early termination of the waiting period under the HSR Act with respect to antitrust review. The anticipated merger remains subject to regulatory approvals from KCC, the MPSC, NRC, FERC and FCC; as well as other contractual conditions.

See Note 2 to the consolidated financial statements for more information regarding the anticipated merger and redemption of acquisition financing associated with the Original Merger Agreement.

Expected Plant Retirements

In June 2017, Great Plains Energy and KCP&L announced plans to retire KCP&L's Montrose Station and GMO's Sibley Station by December 31, 2018 and GMO's Lake Road No. 4/6 Unit by December 31, 2019. The decision to retire these generating units, which represent approximately 900 MWs of generating capacity, was primarily driven by the age of the plants, expected environmental compliance costs and expected future generation capacity needs. See Note 1 to the consolidated financial statements for more information regarding the retirement of Sibley No. 3 Unit.

Tax Reform

In December 2017, the U.S. Congress passed and President Donald Trump signed Public Law No. 115-97, commonly referred to as the Tax Cuts and Jobs Act (Tax Act). The Tax Act represents the first major reform in U.S. income tax law since 1986. Most notably, the Tax Act reduces the current top corporate income tax rate from 35% to 21% beginning in 2018, repeals the corporate Alternative Minimum Tax (AMT), makes existing AMT tax credit carryforwards refundable, and changes the deductibility and taxability of certain items, among other things. See Note 21 to the consolidated financial statements for more information regarding the impact of tax reform on Great Plains Energy and KCP&L.

Earnings Overview

Great Plains Energy had a loss available for common shareholders of \$143.5 million or \$0.67 per share in 2017 compared to earnings of \$273.5 million or \$1.61 per share in 2016. This decrease in earnings was largely driven by a number of non-recurring impacts due to the anticipated merger with Westar and the impacts of U.S. federal income tax reform. The specific drivers of the decrease in earnings were lower gross margin; higher depreciation expense; a loss on the settlement of the 7.00% Series B Mandatory Convertible Preferred Stock (Series B Preferred Stock) dividend make-whole provisions; a loss on extinguishment of debt related to the redemption of Great Plains Energy's \$4.3 billion senior notes; an increase in interest charges; higher income tax expense and increased preferred stock dividend requirements and redemption premium; partially offset by a decrease in injuries and damages expense due to settled litigation and an increase in interest income.

In addition, a higher number of average shares outstanding due to Great Plains Energy's registered public offering of 60.5 million shares of common stock in October 2016 diluted the 2017 loss per share by \$0.26.

For additional information regarding the change in earnings (loss), refer to the Great Plains Energy Results of Operations and the Electric Utility Results of Operations sections within this Management's Discussion and

GREAT PLAINS ENERGY INCORPORATED KANSAS CITY POWER & LIGHT COMPANY

Notes to Consolidated Financial Statements

The notes to consolidated financial statements that follow are a combined presentation for Great Plains Energy Incorporated and Kansas City Power & Light Company, both registrants under this filing. The terms "Great Plains Energy," "Company," "KCP&L" and "Companies" are used throughout this report. "Great Plains Energy" and the "Company" refer to Great Plains Energy Incorporated and its consolidated subsidiaries, unless otherwise indicated. "KCP&L" refers to Kansas City Power & Light Company and its consolidated subsidiaries. "Companies" refers to Great Plains Energy Incorporated and its consolidated subsidiaries. "Companies" refers to Great Plains Energy Incorporated and its consolidated subsidiaries.

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Organization

Great Plains Energy, a Missouri corporation incorporated in 2001, is a public utility holding company and does not own or operate any significant assets other than the stock of its subsidiaries and cash and cash equivalents. Great Plains Energy's wholly owned direct subsidiaries with significant operations are as follows:

- KCP&L is an integrated, regulated electric utility that provides electricity to customers primarily in the states of Missouri and Kansas. KCP&L has one active wholly owned subsidiary, Kansas City Power & Light Receivables Company (KCP&L Receivables Company).
- KCP&L Greater Missouri Operations Company (GMO) is an integrated, regulated electric utility that provides electricity to
 customers in the state of Missouri. GMO also provides regulated steam service to certain customers in the St. Joseph,
 Missouri area. GMO has two active wholly owned subsidiaries, GMO Receivables Company and MPS Merchant Services,
 Inc. (MPS Merchant). MPS Merchant has certain long-term natural gas contracts remaining from its former non-regulated
 trading operations.

Great Plains Energy also wholly owns GPE Transmission Holding Company, LLC (GPETHC). GPETHC owns 13.5% of Transource Energy, LLC (Transource) with the remaining 86.5% owned by AEP Transmission Holding Company, LLC (AEPTHC), a subsidiary of American Electric Power Company, Inc. GPETHC accounts for its investment in Transource under the equity method. Transource is focused on the development of competitive electric transmission projects.

Each of Great Plains Energy's and KCP&L's consolidated financial statements includes the accounts of their subsidiaries. Intercompany transactions have been eliminated.

Great Plains Energy's sole reportable business segment is the electric utility segment (Electric Utility). See Note 22 for additional information.

Use of Estimates

The process of preparing financial statements in conformity with Generally Accepted Accounting Principles (GAAP) requires the use of estimates and assumptions that affect the reported amounts of certain types of assets, liabilities, revenues and expenses. Such estimates primarily relate to unsettled transactions and events as of the date of the financial statements. Accordingly, upon settlement, actual results may differ from estimated amounts.

Cash and Cash Equivalents

Cash equivalents consist of highly liquid investments with original maturities of three months or less at acquisition.

Time Deposit

Consists of a non-negotiable fixed rate investment in a time deposit with an original maturity of greater than three months and is recorded on the balance sheet at cost. The Company estimates the fair value of the time deposit, which approximates its carrying value, using Level 2 inputs based on current interest rates for similar investments with comparable credit risk and time to maturity.

Fair Value of Financial Instruments

The following methods and assumptions were used to estimate the fair value of each class of financial instrument for which it is practicable to estimate that value.

Nuclear decommissioning trust fund - KCP&L's nuclear decommissioning trust fund assets are recorded at fair value based on quoted market prices of the investments held by the fund and/or valuation models.

Pension plans - For financial reporting purposes, the market value of plan assets is the fair value. For regulatory reporting purposes, a five-year smoothing of assets is used to determine fair value.

Derivative Instruments

The Company records derivative instruments on the balance sheet at fair value in accordance with GAAP. Great Plains Energy and KCP&L enter into derivative contracts to manage exposure to commodity price and interest rate fluctuations. Derivative instruments are entered into solely for hedging purposes and are not issued or held for speculative reasons.

The Company considers various qualitative factors, such as contract and market place attributes, in designating derivative instruments at inception. Great Plains Energy and KCP&L may elect the normal purchases and normal sales (NPNS) exception, which requires the effects of the derivative to be recorded when the underlying contract settles. Great Plains Energy and KCP&L account for derivative instruments that are not designated as NPNS as non-hedging derivatives, which are recorded as assets or liabilities on the consolidated balance sheets at fair value.

Great Plains Energy and KCP&L offset fair value amounts recognized for derivative instruments under master netting arrangements, which include rights to reclaim cash collateral (a receivable), or the obligation to return cash collateral (a payable).

Utility Plant

Great Plains Energy's and KCP&L's utility plant is stated at historical cost. These costs include taxes, an allowance for the cost of borrowed and equity funds used to finance construction and payroll-related costs, including pensions and other fringe benefits. Replacements, improvements and additions to units of property are capitalized. Repairs of property and replacements of items not considered to be units of property are expensed as incurred (except as discussed under Deferred Refueling Outage Costs). When property units are retired or otherwise disposed, the original cost, net of salvage, is charged to accumulated depreciation. Substantially all of KCP&L's utility plant is pledged as collateral for KCP&L's mortgage bonds under the General Mortgage Indenture and Deed of Trust dated December 1, 1986, as supplemented (Indenture). A portion of GMO's utility plant is pledged as collateral for GMO's mortgage bonds under the General Mortgage Indenture and Deed of Trust dated April 1, 1946, as supplemented.

As prescribed by The Federal Energy Regulatory Commission (FERC), Allowance for Funds Used During Construction (AFUDC) is charged to the cost of the plant during construction. AFUDC equity funds are included as a non-cash item in non-operating income and AFUDC borrowed funds are a reduction of interest charges. The rates used to compute gross AFUDC are compounded semi-annually. The rates used to compute gross AFUDC for KCP&L averaged 4.9% in 2017, 5.7% in 2016 and 3.0% in 2015. The rates used to compute gross AFUDC for GMO averaged 1.9% in 2017, 1.6% in 2016 and 4.2% in 2015.

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Schedule JAR-3

Table of Contents

Great Plains Energy's and KCP&L's balances of utility plant, at original cost, with a range of estimated useful lives are listed in the following tables.

Great Plains Energy

December 31		2017	2016		
Utility plant, at original cost		(millions)			
Generation (20 - 60 years)	S	7,930.8	s	8,106.4	
Transmission (15 - 70 years)		912.3		886.3	
Distribution (8 - 66 years)		3,789.0		3,629.1	
General (5 - 50 years)		1,042.0		975.9	
Total (a)	S	13,674.1	S	13,597.7	

(a) Includes \$265.0 million and \$261.2 million at December 31, 2017 and 2016, respectively, of land and other assets that are not depreciated.

KCP&L

December 31	2017	2016	
Utility plant, at original cost	(millio	ons)	
Generation (20 - 60 years)	\$ 6,471.5	\$ 6,350.7	
Transmission (15 - 70 years)	500.4	484.1	
Distribution (8 - 55 years)	2,389.4	2,298.4	
General (5 - 50 years)	851.9	791.9	
Total (a)	\$ 10,213.2	\$ 9,925.1	

(a) Includes \$176.0 million and \$178.0 million at December 31, 2017 and 2016, respectively, of land and other assets that are not depreciated.

Plant to be Retired, Net

When Great Plains Energy and KCP&L retire utility plant, the original cost, net of salvage, is charged to accumulated depreciation. However, when it becomes probable an asset will be retired significantly in advance of its original expected useful life and in the near term, the cost of the asset and related accumulated depreciation is recognized as a separate asset as a probable abandonment. If the asset is still in service, the net amount is classified as plant to be retired, net on the consolidated balance sheets. If the asset is no longer in service, the net amount is classified in regulatory assets on the consolidated balance sheets.

Great Plains Energy and KCP&L must also assess the probability of full recovery of the remaining net book value of the abandonment. The net book value that may be retained as an asset on the balance sheet for the abandonment is dependent upon amounts that may be recovered through regulated rates, including any return. An impairment charge, if any, would equal the difference between the remaining net book value of the asset and the present value of the future revenues expected from the asset.

In June 2017, Great Plains Energy and KCP&L announced the expected retirement of certain older generating units, including GMO's Sibley No. 3 Unit, over the next several years. As of December 31, 2017, Great Plains Energy has determined that Sibley No. 3 Unit meets the criteria to be considered probable of abandonment and has classified its remaining net book value of \$143.6 million within plant to be retired, net on its consolidated balance sheet. The Company is currently allowed a full recovery of and a full return on Sibley No. 3 Unit in rates and has concluded that no impairment is required as of December 31, 2017.

Depreciation and Amortization

Depreciation and amortization of utility plant other than nuclear fuel is computed using the straight-line method over the estimated lives of depreciable property based on rates approved by state regulatory authorities. Annual depreciation rates average approximately 3%. Nuclear fuel is amortized to fuel expense based on the quantity of heat produced during the generation of electricity.

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ER-2018-0145 and ER-2018-146

KANSAS CITY POWER & LIGHT COMPANY and KANSAS CITY POWER LIGHT GREATER OPERATIONSCOMPANY

SCHEDULES JAR-R-2C through JAR-R-5C

HAVE BEEN DEEMED

"CONFIDENTIAL"

IN THEIR ENTIRETY

Schedule JAR-3

Exhibit No.: Issue(s):

Sponsoring Party:

Case No.:

GMO Additional Amortization/ GMO Capacity/ Plant Retirements and Expenses/ True-Up Direct Witness/Type of Exhibit: Robinett/Surrebuttal True Up Direct Public Counsel ER-2018-0145 ER-2018-0146

SURREBUTTAL TESTIMONY **TRUE UP DIRECT TESTIMONY**

OF

JOHN A. ROBINETT

Submitted on Behalf of the Office of the Public Counsel

KANSAS CITY POWER & LIGHT COMPANY Case No. ER-2018-0145

KCP&L GREATER MISSOURI OPERATIONS COMPANY Case No. ER-2018-0146

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Denotes Information that has been redacted

September 4, 2018



BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power &)	
Light Company's Request for Authority)	File No. ER-2018-0145
to Implement a General Rate Increase)	
for Electric Service)	
In the Matter of KCP&L Greater Missouri)	
Operations Company's Request for)	File No. ER-2018-0146
Authority to Implement a General)	
Rate Increase for Electric Service)	

AFFIDAVIT OF JOHN A. ROBINETT

STATE OF MISSOURI)) ss COUNTY OF COLE)

John A. Robinett, of lawful age and being first duly sworn, deposes and states:

1. My name is John A. Robinett. I am a Utility Engineering Specialist for the Office of the Public Counsel.

2. Attached hereto and made a part hereof for all purposes is my surrebuttal and true up direct testimony.

3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

John A. Robinett Utility Engineering Specialist

Subscribed and sworn to me this 4th day of September 2018.



JERENE A. BUCKMAN My Commission Expires August 23, 2021 Cole County Commission #13754037

Jerene A. Buckman Notary Public

My Commission expires August 23, 2021.

Schedule JAR-4

Testimony	Page
GMO Additional Amortization	2
GMO Capacity	5
Plant Retirements and Expenses	8
True-Up Direct	12

SURREBUTTAL TESTIMONY

AND

TRUE-UP DIRECT TESTIMONY OF

JOHN A. ROBINETT

KANSAS CITY POWER AND LIGHT COMPANY

KCP&L GREATER MISSOURI OPERATIONS COMPANY

CASE Nos. ER-2018-0145 and ER-2018-0146

1	Q.	What is your name and what is your business address?
2	A.	John A. Robinett, PO Box 2230, Jefferson City, Missouri 65102.
3	Q.	By whom are you employed and in what capacity?
4	А.	I am employed by the Missouri Office of the Public Counsel ("OPC") as a Utility Engineering
5		Specialist.
6	Q.	Are you the same John A. Robinett that filed direct and rebuttal testimony on behalf of
7		the OPC in this proceeding?
8	А.	Yes.
9	Q.	What is the purpose of your surrebuttal testimony?
10	А.	I refute the rebuttal testimony of Kansas City Power & Light Company ("KCPL") and Kansas
11		City Power & Light Company Greater Missouri Operation ("GMO") (collectively "KCP&L")
12		witness Ronald A. Klote's discussion of the additional amortization related to depreciation
13		for GMO. To address OPC's concerns related to the negative effects on customers' rates for
14		GMO's decision to retire Sibley unit 3 by the end of 2018, I refute the rebuttal testimony of
15		KCP&L's witness Burton L. Crawford related to my use of "outdated capacity data."
16		Additionally I rebut the Staff's witnesses Karen Lyons, Stephen B. Moilanen P.E. and Keith
17		Majors, and KCP&L witness Darrin Ives regarding their illogical position of including
18		operations and maintenance ("O&M") expense for generating units retiring in 2018 and 2019,
19		including Sibley 3.
20		Finally, in True-up Direct, I address the issue of plant retirements and reduction of operations
21		and maintenance expense, and depreciation expense for KCP&L, as well as the booking of
22		plant-in-service of ONE CIS.
	18	

1	GMO Additional Amortization		
2	Q.	Did some parties enter into an agreement that addressed depreciation in Case No.	
3		ER-2016-0156?	
4	A.	Yes. Several Parties entered into a Non-Unanimous Stipulation and Agreement	
5		(Agreement) that addressed depreciation and other issues, which was filed on September	
6		20, 2016.	
7	Q.	In his rebuttal testimony, does Mr. Klote provide all of the depreciation terms in that	
8		Agreement?	
9	А.	No, here is the entire paragraph:	
10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25		3. DEPRECIATION RATES The Signatories agree to the use of the depreciation rates as presented in the attached Schedule A – Depreciation Accrual Rates. The schedule includes depreciation rates for new solar generation for Accounts 341 Structures and Improvements – Solar, 344 Generators – Solar, 345 Accessory Electric Equipment – Solar, 346 Miscellaneous Power Plant Equipment – Solar and AMI-Meters – Account 370.02. In addition to the attached schedule, GMO shall be allowed to collect an annual amortization amount equal to \$7.2 million. This additional amortization shall be booked and accounted for on an annual basis until GMO's next general electric rate case. In GMO's next filed rate case the Commission will determine the distribution of the additional amortization. The balance will be used to cover any deficiencies in reserves across production, transmission and distribution accounts. Any undistributed balance will be used as an offset to future rate base. This amortization is for purpose of settlement of this case only and does not constitute an agreement as to the methodology or a precedent for any future rate case.	
26	Q.	Does the Non-Unanimous Stipulation and Agreement say anything about the duration	
27		of the additional amortization?	
28	A.	Yes. It states, "This additional amortization shall be booked and accounted for on an annual	
29		basis until GMO's next general electric rate case. In GMO's next filed rate case the	
30		Commission will determine the distribution of the additional amortization."	
31	Q.	Is this GMO rate case "GMO's next filed rate case"?	

1	A.	Yes. It is this current case, Case No. ER-2018-0146. This is GMO's first general rate case
2		since Case No. ER-2016-0156.
3	Q.	How did GMO's current general rate case start?
4	A.	GMO chose to file it. Not only did GMO decide to file this rate case, it also decided to not
5		to file a depreciation study, not to have a depreciation witness and not to recommend where
6		to book the funds it collected through this additional amortization. The settlement language
7		states two very cut and dry terms. The first is:
8 9		"This additional amortization shall be booked and accounted for on an annual basis until GMO's next general electric rate case."
10		This language is clear. The parties agreed to an additional amortization until the next
11		general rate case, likely no more than approximately four years-the longest period if
12		GMO wants to continue a fuel adjustment clause. The second is:
13 14 15		"This amortization is for [the] purpose of settlement of this case only and does not constitute an agreement as to the methodology or a precedent for any future rate case."
16		This portion clearly indicates that the amortization was for the limited purpose of settling
17		the 2016 general rate proceeding, and, further, that there was no agreement on methodology
18		or precedent for a future rate case.
19	Q.	Why does GMO state the Agreement was necessary?
20	A.	GMO states that the depreciation study filed in 2016 showed that rates should be higher than
21		the ordered depreciation rates prior to the 2016 rate case. Mr. Klote quotes former Staff
22		witness Derick Miles' surrebuttal testimony from Case No. ER-2016-0156:
23 24		Q: Is Staff aware of other methods GMO could utilize to make up any imbalance in the depreciation reserves?
25 26 27 28		A: Yes. Staff is currently reviewing the option that an additional annual amortization amount be collected in lieu of adopting GMO's proposed depreciation rates. This additional annual amount would be in addition to Staff's proposed adoption of current Commission ordered rates.

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My review of all of Mr. Miles' testimony from Case No. ER-2016-0156 leaves me with the question of what kind of imbalance in reserves was occurring. Based on my review of Mr. Miles' testimony it is unclear whether there was an actual reserve imbalance or only a theoretical imbalance created by the GMO's recommended new depreciation rates. The next rationale GMO provides is that it has only been a short time period since the additional amortization and depreciation rates became effective.

- Q. On page 13 of his rebuttal testimony, Mr. Klote claims that this is not the time to change
 depreciation rates agreed to in GMO's most recent rate proceeding. Does removing the
 additional amortization change any depreciation rate?
- A. No. The fact that Staff and OPC remove the additional amortization going forward does
 not change depreciation rates or expense; the removal reduces the amortization expense
 that GMO is receiving from its customers.
- 13Q.GMO states that Staff has not provided a depreciation study to support that the
additional amortization is not needed. Has GMO filed a depreciation study?
- 15 A. No. GMO filed this rate case, but did not file a depreciation study.
- Q. Did GMO provide any information about its depreciation reserve imbalances as part of
 its current rate case?
- 18 A. GMO provided the following narrative in Mr. Klote's rebuttal testimony:

Additionally, as no party to this case has provided a depreciation study to support the ceasing of the additional amortization, there is no evidence in this proceeding to support discontinuing recording this additional amortization. Such an action could have the unintended consequence of creating even further imbalances in the future than were identified in the depreciation study in the prior case. GMO has committed to filing a Depreciation Study in the next case in which all aspects of plant will be examined.

It is important to point out that GMO has provided no support for continuing this additional amortization. It is also important to determine if any imbalance in reserves is due to GMO's actions or to other factors. GMO is claiming there is reserve imbalance. If its

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recommended change in depreciation rates from the 2016 case were applied to plant-inservice by vintages as if the recommended new depreciation rates were in effect for the entire life of the plant-in-service, this would create a theoretical reserve that will likely vary greatly from the actual book reserves, but the testimonies do not state whether the reserve imbalance is real or theoretical.

Q. Does OPC have any other evidence that refutes GMO's claimed need for the additional amortization to continue?

A. Yes. GMO's response to OPC data request number 8521 demonstrates that a depreciation study may be necessary to achieve reasonably accurate reserve balances. The reason for this is that GMO and KCPL both do not track depreciation by plant and account. Instead they track depreciation by functional type of plant (generation, transmission, distribution, and general plant).

Generating unit reserve amounts as listed in the data request are not the same as would be determined via a depreciation study. A depreciation study is required to derive a more accurate reserve balance. The depreciation study would analyze asset remaining life, cost of removal and salvage parameters, etc. to develop the appropriate reserve balance. The Company did not perform a depreciation study for this rate case.

Q. What is OPC's recommendation for the additional amortization?

A. Funds collected for the additional amortization related to depreciation collected through June
 30, 2018 is \$9,718,356 and should be transferred to depreciation reserves for production plant.
 The additional amortization funds should continue to be tracked and booked by GMO for
 funds collected after true-up cut-off and the date of new effective rates. OPC concurs with
 Staff and recommends discontinuing the additional amortization.

GMO Capacity

- Q. Does OPC still have a concern about the adequacy of GMO's capacity to serve its customers' needs?
- A. Yes. Based on Southwest Power Pool's ("SPP") 2017 Resource Adequacy Report, OPC is
 concerned that GMO's plans to retire the Sibley generating plants by the end of 2018 will

1		leave GMO incapable of meeting SPP's twelve percent excess capacity standards with
2		owned resources.
3	Q.	KCPL and GMO witness Mr. Crawford criticizes OPC for using outdated SPP
4		information for its support. Did OPC rely on outdated information?
5	A.	No. When I filed direct testimony in these cases I relied on SPP's 2017 Resource Adequacy
6		Report for GMO and KCPL. Since then, on June 29, 2018, SPP released its 2018 Resource
7		Adequacy Report. That Report is attached as schedule JAR-S-1 to this testimony.
8	Q.	Is there anything particularly significant about that report?
9	A.	Yes. In this report GMO is no longer reported separately. Instead, it and KCPL are reported
10		collectively in the KCP&L submission.
11	Q.	Did SPP require KCPL and GMO to be reported collectively?
12	A.	According to GMO and KCPL in their response to OPC data requests 8537 and 8538 they
13		are not:
14		8538. KCPL and/or GMO did not receive specific direction requesting that
15 16		they make a separate resource adequacy submission for purposes of inclusion in the 2017 SPP Resource Adequacy Report.
17		8537. KCPL and/or GMO did not receive specific direction requesting that
18 19		they make a combined resource adequacy submission for purposes of inclusion in the 2018 SPP Resource Adequacy Report.
20		Additionally, OPC requested all communication between SPP, and KCPL and GMO
21		related to KCPL and GMO's decision to file a consolidated resource adequacy report to
22		SPP in OPC data request 8540. This data request response is attached as schedule JAR-S-
23		2. The response is a series of chain email exchanges between SPP and KCP&L one of
24		which a KCP&L employee states that:
25		it is our preference that KCP&L and GMO resources be
26 27		included/combined in one RAW workbook as being under the KCPL market
27		participant.
28	Q.	Who decided to make a combined KCPL and GMO resource adequacy submission
29		for purposes of inclusion in the 2018 SPP Resource Adequacy Report?

1	A.	According to KCP&L's response to OPC data request number 8536, Burton Crawford of
2		KCP&L:
3 4 5		The decision to file a combined resource adequacy submission for the 2018 SPP Resource Adequacy Report was made by Burton Crawford, Director Energy Resource Management.
6	Q.	Have GMO and KCPL described why they made a combined KCPL and GMO
7		resource adequacy submission for purposes of inclusion in the 2018 SPP Resource
8		Adequacy Report?
9	А.	Yes, the full response to OPC data request 8535 is attached as schedule JAR-S-3. Mr.
10		Crawford states that:
11 12 13 14		KCP&L has an option to aggregate the forecasted KCP&L and GMO peak demands for resource adequacy purposes. This combined view reduces the chances that GMO or KCP&L on an individual basis would fail to meet the SPP resource adequacy requirement.
15	Q.	Why is it important that KCP&L made a combined SPP Resource Adequacy Report
16		in 2018?
17	A.	It shows that KCP&L does not resource plan for KCPL and GMO separately, but instead
18		considers them as a single operational entity for planning purposes. In KCP&L's response
19		to OPC data request 8535 Mr. Crawford offers the following example:
20 21 22 23 24 25 26 27 28		For example, if GMO did not have sufficient capacity to meet the 12% reserve margin requirement and KCP&L [KCPL] had sufficient capacity to cover the shortfall, no penalties would be incurred by GMO for a failure to meet the resource adequacy requirement as compliance would be determined on a combined basis. While the Companies fully expect and plan for GMO and KCP&L on an individual basis to meet their share of the SPP resource adequacy requirement, the 2018 resource adequacy filing to SPP was made on a combined basis.
29		OPC is raising this very concern of the ability to meet the SPP resource adequacy
30		requirements as the direct result of the retirement of the Sibley generating units by the end
31		of 2018. Mr. Crawford ironically uses OPC's concern as an example for why KCPL and
32		GMO should be considered consolidated in order to avoid any shortfall or penalties for
33		failure to meet the resource adequacy requirement.

What is OPC's recommendation? О. 1

2 A. KCPL and GMO should be functionally consolidated for ratemaking and regulatory purposes. Both are now reporting to SPP for purposes of resource adequacy on a combined basis, and OPC witnesses Dr. Karl Richard Pavlovic and Robert E. Schallenberg provide further recommendations in their testimony as to why the rates of KCPL and GMO should be consolidated.

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Plant Retirements and Expenses

Q. What is Staff's position regarding OPC's recommendation to remove operating and maintenance expense for the announced retirements of KCPL Montrose units 2, 3 and common plant, and GMO Sibley units 1, 2, 3, and common plant?

Staff Witness Ms. Karen Lyons states that the actual retirement dates are unknown, and A. 11 12 that, since the projected retirements are beyond the true-up period in this case, Staff will include all investment and normalized and annualized revenue and expenses. Additionally, 13 Staff is including all operation and maintenance expenses associated with the retirements. 14 Staff auditors do not characterize the O&M costs as being immeasurable, since those costs 15 were built into KCPL's and GMO's rates on a going forward basis for Staff's 16 17 recommended revenue requirements.

Q. 18

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Does Staff's depreciation witness discuss known and measurable variables?

Yes. Mr. Moilanen claims retirements are unknown, and that removing expenses is A. presumptuous and does not utilize known and measurable information.¹

Q. What is Staff's position regarding OPC's recommendation to stop depreciating the announced retirements of KCPL Montrose units 2, 3 and common plant, and GMO Sibley units 1, 2, 3, and common plant?

24 A. Mr. Moilanen of Staff does not support OPC's position to remove depreciation expense from the revenue requirement of KCPL for KCPL Montrose units 2, 3, and common plant, 25 or from the revenue requirement of GMO for GMO Sibley units 1, 2, 3, and common, plant 26

¹ Rebuttal Testimony of Staff witness Stephen B. Moilanen, PE page 4 line5

1		as Staff states they are planned but not certain retirements. Mr. Moilanen himself indicates
2		what the values of depreciation expense are that have been included in Staff's revenue
3		requirement runs for the plants that will be retired.
4	Q.	Does Staff discuss regulatory lag in its rebuttal testimony?
5	A.	Yes. Staff witness Mr. Keith Majors addresses regulatory lag beginning at page 4 of his
6		rebuttal testimony. At page 6 Mr. Majors gives some examples:
7 8 9 10 11 12 13 14 15		 Q. What are some examples of cost decreases or increases in revenue for KCPL or GMO that have occurred or will occur in the future? A. Here are some examples: Tax savings from the Tax Cuts and Jobs Act of 2017 GPE-Westar merger synergy savings Transmission expense reduction related to the Tax Cuts and Jobs Act of 2017 Planned coal retirements at Montrose and Sibley Reduction in Missouri corporate income tax rate
16	Q.	Why is Major's regulatory lag discussion here?
17	А.	Mr. Majors points to the retirements of the KCP&L generation plants as cost decreases that
18		will occur and provide positive regulatory lag. Mr. Majors considered it sufficiently known
18 19		will occur and provide positive regulatory lag. Mr. Majors considered it sufficiently known that he is able to provide these retirements as examples of cost decreases or increases in
19	Q.	that he is able to provide these retirements as examples of cost decreases or increases in
19 20	Q. A.	that he is able to provide these retirements as examples of cost decreases or increases in revenue that KCP&L will experience.
19 20 21	_	that he is able to provide these retirements as examples of cost decreases or increases in revenue that KCP&L will experience.Do KCPL and GMO share Staff's opinion that the retirements are not known?
19 20 21 22	_	 that he is able to provide these retirements as examples of cost decreases or increases in revenue that KCP&L will experience. Do KCPL and GMO share Staff's opinion that the retirements are not known? Yes. Mr. Darrin Ives asserts in his rebuttal testimony that the retirements are neither known

² KCPL, GMO witness Mr. Darrin Ives, Rebuttal Testimony page 4.

1 2 3 4		In addition to the fact that the dates of these unit retirements are presently unknown, the effect of such retirements on revenue requirements is not measurable. OPC has not specified or attempted to quantify the O&M levels it proposes to exclude in connection with these units. ³
5		OPC issued data requests to Staff, KCPL, and GMO to try to quantify the effects each of
6		the retirements would have on their fuel runs. However, both Staff and KCPL refused to
7		run their fuel models to provide estimates of the impacts of any of OPC's positions when
8		OPC asked them to do so in data requests OPC issued on July 30, 2018.
9	Q.	Do you agree that the retirements are not known?
10	А.	No, I do agree that the actual dates that the units will retire are unknown. However, KCPL
11		and GMO both provided confidential schedules BLC-5 to the separate KCPL and GMO
12		pre-filed direct testimonies of Mr. Burton L. Crawford. Those schedules are attached to
13		this testimony as Schedule JAR-S-4C. These confidential schedules provide the expected
14		dispatch of each generating unit. **
15		
16		
17		**
18		
	Q .	Do you agree that the retirements are not measurable?
19	Q. A.	Do you agree that the retirements are not measurable? No. I strongly disagree with KCPL and GMO's claim that the effects of the retirements are
19 20		
		No. I strongly disagree with KCPL and GMO's claim that the effects of the retirements are
20		No. I strongly disagree with KCPL and GMO's claim that the effects of the retirements are not measurable. Neither Staff, KCPL, nor GMO have calculated the effects of any of the
20 21		No. I strongly disagree with KCPL and GMO's claim that the effects of the retirements are not measurable. Neither Staff, KCPL, nor GMO have calculated the effects of any of the retirements in the current cases, and they have no intention to do so. Staff, KCPL, and
20 21 22		No. I strongly disagree with KCPL and GMO's claim that the effects of the retirements are not measurable. Neither Staff, KCPL, nor GMO have calculated the effects of any of the retirements in the current cases, and they have no intention to do so. Staff, KCPL, and GMO have refused to run their fuel models to provide estimates of the impact of any of
20 21 22 23	A.	No. I strongly disagree with KCPL and GMO's claim that the effects of the retirements are not measurable. Neither Staff, KCPL, nor GMO have calculated the effects of any of the retirements in the current cases, and they have no intention to do so. Staff, KCPL, and GMO have refused to run their fuel models to provide estimates of the impact of any of OPC's positions when OPC asked them to in data requests issued on July 30, 2018.

³ KCPL, GMO witness Mr. Darrin Ives, Rebuttal Testimony page 4.

OPC is relying on information that KCPL and GMO provided. GMO and KCPL announced A. 1 their plans to retire the units. Even Mr. Ives' rebuttal testimony confirms again their 2 3 retirement plans. 4 KCP&L has announced plans to retire two generating units (Montrose 2 and 5 Montrose 3) by December 31, 2018. GMO has announced plans to retire three generating units (Sibley 1⁴, Sibley 2, and Sibley 3) by December 31, 2018 and 6 one generating unit (Lake Road 4/6) by December 31, 2019.⁵ 7 OPC also relied on information provided in KCP&L witness Mr. Crawford's direct 8 9 testimony, specifically confidential Schedule BLC-5 which provides the expected resource dispatch levels based on an economic dispatch. Additionally, attached to my rebuttal 10 testimony as schedule JAR-R-1 and attached here as schedule JAR-S-5, are selected 11 excerpts from Great Plains Energy's form 10K for calendar year 2017. These excerpts 12 clearly state: 13 As of December 31, 2017, Great Plains Energy has determined that Sibley 14 No. 3 Unit meets the criteria to be considered probable of abandonment and 15 has classified its remaining book value of \$143.6 million within plant to be 16 retired, net on its consolidated balance sheet.⁶ 17 This 10-K is important because it indicates that the Great Plains Energy knows and has 18 calculated the balance of undepreciated balance. Within the 10-K, the Sibley 3 retirement 19 was known, measurable, and material enough to report this matter to the U.S. Securities 20 and Exchange Commission by the end of 2017. 21 0. 22 Does Mr. Moilanen support OPC's recommendation that if the Commission includes depreciation and O&M expenses in KCPL's and GMO's rates going forward, then 23 the Commission should require KCP&L to track the generation plant retirement cost 24 effects? 25 26 A. Yes. At page 4 of his rebuttal testimony Mr. Moilanen states:

⁴ GMO retired the non-boiler components of Sibley Unit 1 in June 2017 for operational reasons. (Page3 Ives rebuttal testimony)

⁵ KCPL, GMO witness Mr. Darrin Ives, Rebuttal Testimony page 3.

⁶ Great Plains Energy 10-K for calendar year 2017

1 2 3 4 5 6 7		Staff agrees that it is appropriate to document the difference between the depreciation expense booked to reserve and depreciation expense included in rates for the Sibley, Montrose, and Lake Road units. Staff has no position regarding what course of action to take in regards to this difference in future rate cases. In Staff's opinion, it is prudent for this value to be recorded. Staff can review this information in future rate cases when developing a position regarding adjustments to depreciation reserve.
8		Staff does not express a position on O&M trackers related to the retirements of KCP&L
9		plants in order to track costs included in rates despite the fact KCP&L will have no O&M
10		costs after the plants are retired.
11	True	e-Up Direct
12	Q.	What are you addressing in true-up direct?
13	A.	I address OPC's positions on removing depreciation and O&M expenses from revenue
14		requirement, for retirements of generation facilities to retire by January 1, 2019, and One
15		CIS allocation and plant-in-service booking.
16	Q.	What is OPC's position related to generating plant retirements to occur by January
17		1, 2019?
17 18	A.	
	A.	1,2019? Consistent with OPC's direct, rebuttal, and surrebuttal positions, OPC continues to recommend removing all depreciation expense, and O&M expenses related to the
18	А.	Consistent with OPC's direct, rebuttal, and surrebuttal positions, OPC continues to
18 19	A.	Consistent with OPC's direct, rebuttal, and surrebuttal positions, OPC continues to recommend removing all depreciation expense, and O&M expenses related to the
18 19 20	А.	Consistent with OPC's direct, rebuttal, and surrebuttal positions, OPC continues to recommend removing all depreciation expense, and O&M expenses related to the announced retirements of KCP&L generating facilities. If the Commission determines
18 19 20 21	А.	Consistent with OPC's direct, rebuttal, and surrebuttal positions, OPC continues to recommend removing all depreciation expense, and O&M expenses related to the announced retirements of KCP&L generating facilities. If the Commission determines those expenses should be included in KCPL's and GMO's cost of service used for setting
18 19 20 21 22	A.	Consistent with OPC's direct, rebuttal, and surrebuttal positions, OPC continues to recommend removing all depreciation expense, and O&M expenses related to the announced retirements of KCP&L generating facilities. If the Commission determines those expenses should be included in KCPL's and GMO's cost of service used for setting customers rates, OPC alternatively requests that the Commission order trackers to allow
 18 19 20 21 22 23 24 		Consistent with OPC's direct, rebuttal, and surrebuttal positions, OPC continues to recommend removing all depreciation expense, and O&M expenses related to the announced retirements of KCP&L generating facilities. If the Commission determines those expenses should be included in KCPL's and GMO's cost of service used for setting customers rates, OPC alternatively requests that the Commission order trackers to allow for a potential future rate base offset for funds collected from ratepayers for facilities that essentially provided no value to customers once rates are set in the current cases.
 18 19 20 21 22 23 24 25 	Q.	Consistent with OPC's direct, rebuttal, and surrebuttal positions, OPC continues to recommend removing all depreciation expense, and O&M expenses related to the announced retirements of KCP&L generating facilities. If the Commission determines those expenses should be included in KCPL's and GMO's cost of service used for setting customers rates, OPC alternatively requests that the Commission order trackers to allow for a potential future rate base offset for funds collected from ratepayers for facilities that essentially provided no value to customers once rates are set in the current cases. What is OPC's position at true-up for ONE CIS?
 18 19 20 21 22 23 24 25 26 		Consistent with OPC's direct, rebuttal, and surrebuttal positions, OPC continues to recommend removing all depreciation expense, and O&M expenses related to the announced retirements of KCP&L generating facilities. If the Commission determines those expenses should be included in KCPL's and GMO's cost of service used for setting customers rates, OPC alternatively requests that the Commission order trackers to allow for a potential future rate base offset for funds collected from ratepayers for facilities that essentially provided no value to customers once rates are set in the current cases. What is OPC's position at true-up for ONE CIS? Dr. Geoff Marke of OPC provides the OPC recommendation on ONE CIS. If the
 18 19 20 21 22 23 24 25 	Q.	Consistent with OPC's direct, rebuttal, and surrebuttal positions, OPC continues to recommend removing all depreciation expense, and O&M expenses related to the announced retirements of KCP&L generating facilities. If the Commission determines those expenses should be included in KCPL's and GMO's cost of service used for setting customers rates, OPC alternatively requests that the Commission order trackers to allow for a potential future rate base offset for funds collected from ratepayers for facilities that essentially provided no value to customers once rates are set in the current cases. What is OPC's position at true-up for ONE CIS?

KCP&L in the future allocated and shared ONE CIS with Westar. OPC in true-up direct takes the position that the costs of ONE CIS once allocated should be placed on each entities books so GMO, KCPL-MO and KCPL-KS will have their allocated piece recorded on their books as plant-in-service.

Q. Would you briefly summarize OPC's recommendations provided in your testimony?

A. OPC offers the following recommendations in this testimony:

1) All costs associated with the retirements of KCPL's Montrose units 2, 3, and common plant, and GMO's Sibley units 1, 2, and common plant be excluded in their costs of service used for setting rates in these cases, as these units will be retired by the end of 2018. If the Commission includes these costs in their costs of service, the OPC alternatively requests a separate tracker on those costs beginning when each of the generating plants is retired.

2) That the \$7.2 million additional amortization related to depreciation expense for GMO be stopped. Funds collected for the additional amortization related to depreciation collected through June 30, 2018 is \$9,718,356 and should be transferred to depreciation reserves for production plant. The additional amortization funds should continue to be tracked and booked by GMO for funds collected after true-up cut-off and the date of new effective rates.

3) A decrease in depreciation expense for KCPL related to the Montrose units 2, 3, and common plant retirements of \$3,126,768 based on the depreciation expense of true-up accounting schedules from Case No. ER-2018-0145.

4) A decrease in depreciation expense for GMO related to the Sibley units 1 and 2 retirements of \$1,114,733 based on the depreciation expense of direct accounting schedules from Case No. ER-2018-0146.

5) As GMO and Staff have done, all operations and maintenance expenses, depreciation expenses, and property taxes for Sibley unit 3, Sibley common plant, and Sibley unit 1 boiler be included in GMO's cost of service used for setting rates, provided that the Commission finds it imprudent for GMO to retire this unit by the end of 2018.

If the Commission finds it prudent for GMO to retire Sibley unit 3 by the end of 2018, then all operations and maintenance expenses, depreciation expenses, and property taxes for Sibley unit 3, Sibley common plant, and Sibley unit 1 boiler should be excluded from, and all costs associated with the retirement of GMO's Sibley unit 3, Sibley common plant, and Sibley unit 1 boiler be included in GMO's cost of service used for setting rates.

6) If the Commission does not accept Dr. Marke's position, OPC in rebuttal testimony indicated that it is supportive of the allocation put forward by Staff, but amended with a tracker if KCP&L in the future allocated and shared ONE CIS with Westar. OPC in true-up direct takes the position that the costs of ONE CIS once allocated should be placed on each entities books so GMO, KCPL-MO and KCPL-KS will have their allocated piece recorded on their books as plant-in-service.

- **Q.** Does this conclude your surrebuttal and true-up testimony?
- A. Yes, it does.

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SPP 2018 RESOURCE ADEQUACY REPORT

Published on June 29th, 2018

By SPP Resource Adequacy

Schedule JAR-S-1 1/35

Schedule JAR-4

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OVERVIEW AND ASSUMPTIONS

Southwest Power Pool proposed Tariff language in Attachment AA, which is currently pending approval at FERC, requires a Load Responsible Entity (LRE) to maintain capacity required to meet its load and planning reserve obligations. No later than June 15th of each year, a final report on the status of each LRE's compliance with the RAR for the upcoming Summer Season will be posted on the SPP website.

This report will assess resource adequacy across the SPP Balancing Authority (BA) for the 2018 Summer Season. The data for this report originates from the LRE and Generator Owner (GO) submitted Workbooks.

The reserve margin calculation is an industry planning metric used to examine future resource adequacy. This deterministic approach examines the forecasted Net Peak Demand (load) and the availability of existing resources to serve the forecasted Net Peak Demand for the current Summer Season.

Net Peak Demand projections, or load forecasts, are provided by each LRE. Load forecasts include peak hourly load, or Peak Demand, for the 2018 Summer Season. Peak Demand projections are based on normal weather (50/50 distribution) and provided on a non-coincident basis.

DEFINITIONS

Firm Capacity

The accredited capacity of commercially operable generating units, or portions of generating units, adjusted to reflect purchases and sales of capacity with another party, and that is deliverable with firm transmission service to the LRE's load.

Firm Power

Power purchases and sales deliverable with firm transmission service to serve the LRE's load with capacity, energy, and planning reserves, that must be continuously available in a manner comparable to power delivered to native load customers.

Load Responsible Entity

An Asset Owner with registered load in the Integrated Marketplace.

Net Peak Demand

The forecasted Peak Demand less the a) projected impacts of demand response programs and behind-the-meter generation that are controllable and dispatchable and not registered as a Resource and b) adjusted to reflect the contract amount of Firm Power with another entity as specified in Section 8.2 of this Attachment AA.

Peak Demand

The highest demand including transmission losses for energy measured over a one clock hour period.

Planning Reserve Margin

The Planning Reserve Margin ("PRM") shall be twelve percent (12%). If an LRE's Firm Capacity is comprised of at least seventy-five percent (75%) hydro-based generation, then such PRM shall be nine point eight nine percent (9.89%).

Resource Adequacy Requirement

The Resource Adequacy Requirement is equal to the LRE's Summer Season Net Peak Demand plus its Summer Season Net Peak Demand multiplied by the PRM.

Summer Season

June 1st through September 30th of each year.

SPP HIGHLIGHTS

The Southwest Power Pool (SPP) BA covers 575,000 square miles and encompasses all or parts of Arkansas, Iowa, Kansas, Louisiana, Minnesota, Missouri, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas and Wyoming. The SPP footprint has approximately 61,000 miles of transmission lines, over 750 generating plants, and 4,811 transmission-class substations, and it serves a population of 18 million people.







SPP CURRENT AND FIVE-YEAR OUTLOOK

Demand Summary	2018	2019	2020	2021	2022	2023
Peak Demand (Forecasted)	53,165	53,319	53,570	53,927	54,527	54,816
Controllable and Dispatchable DR - Available	909	884	935	960	975	992
Controllable and Dispatchable DEG - Available	295	309	292	290	291	293
External Firm Power Purchases	1,317	1,317	1,317	1,317	1,317	1,317
External Firm Power Sales	0	0	0	0	0	0
Net Peak Demand (Forecasted) (e.g. 53,165-909-295-1,317+0)	50,644	50,809	51,026	51,360	51,944	52,214
Firm Capacity (Units - MW)	2018	2019	2020	2021	2022	2023
Other Capacity Adjustments - Additions	313	319	319	319	333	347
Other Capacity Adjustments - Reductions	723	646	533	556	569	569
Confirmed Retirements	0	740	951	1,041	1,041	1,153
Unconfirmed Retirements	0	153	299	355	416	741
Scheduled Outages	165	113	31	69	69	64
Transmission Limitations	0	0	0	0	0	0
External Firm Capacity Purchases	602	402	404	349	359	346
External Firm Capacity Sales	623	1,022	1,022	586	586	586
Firm Capacity Resources	65,485	66,107	66,295	66,268	66,284	66,466
Firm Capacity (e.g. 65,485+313-723-0-0-165+0+602-623)	64,889	64,154	64,182	64,329	64,295	64,046
SPP Planning Reserve Margin (e.g. [64,889-50,644]/50,644)	28.1%	26.3%	25.8%	25.3%	23.8%	22.7%
Resource Adequacy Requirement (e.g. 50,644 + 50,644*12%)	56,721	56,906	57,149	57,523	58,177	58,480
SPP Excess Capacity – LRE	8,168	7,248	7,033	6,806	6,118	5,566
SPP Excess Capacity – Generator Owner Only entities, excluding wind and solar resources (Capacity not committed to an LRE)	120	876	987	1,319	1,895	1,903

FUEL TYPE SUMMARY

The Firm Capacity resources shown below are based on the available LRE and GO excess generation for the 2018-2023 Summer Seasons.

2018 Fuel Type Summary Petroleum 3% Other 0% Nuclear 3% Natural Gas 48% Solar 0% Biom 0% Coal 38% Hydro 5%	nass	Pet Othe 0% Nucle 3%	aroleum3%	Fuel Typ	be Sumr	Solar 0% Bi	
Firm Capacity Resources	Unit	2018	2019	2020	2021	2022	2023
Biomass	MW	42	42	42	42	42	42
Coal	MW	25,075	25,146	25,146	25,145	25,145	25,145
Hydro	MW	3,162	3,162	3,162	3,161	3,161	3,161
Natural Gas	MW	31,204	31,233	31,284	31,284	31,314	31,306
Nuclear	MW	1,947	2,007	2,007	2,007	2,007	2,007
Other	MW	282	282	282	282	282	282
Petroleum	MW	1,666	1,691	1,672	1,672	1,651	1,651
Solar	MW	181	181	196	196	196	196
Wind	MW	1,926	2,363	2,504	2,479	2,486	2,676
Firm Capacity Resources	MW	65 <i>,</i> 485	66,107	66,295	66,268	66,284	66,466

The reported amount of confirmed and unconfirmed retirements, shown below, are expected to be around 1,894 MWs by the end of 2023, with coal accounting for 56% of the retirements and natural gas for the remaining 44%.

Confirmed and Unconfirmed Retirements	Unit	2018	2019	2020	2021	2022	2023
Coal	MW		893.2	990.3	990	990	1056
Natural Gas	MW			260	406	467	838
Total	MW	0	893	1,250	1,396	1,457	1,894

LOAD RESPONSIBLE ENTITIES

American Electric Power Arkansas Electric Cooperative Corporation **Basin Electric Power Cooperative Big Rivers Electric Corporation Carthage Water & Electric Plant** City of Chanute City of Fremont City of Grand Island Nebraska Utilities City of Hastings Nebraska Utilities City of Malden Board of Public Works City of Neligh City of Piggott Municipal Light & Water City of Poplar Bluff Municipal Utilities City of Superior Nebraska (All load being served with Firm Power contracts – 7 MW of Peak Demand) City of West Plains Board of Public Works City Utilities of Springfield **Empire District Electric Company ETEC/NTEC/Tex-La** Falls City Utilities **Golden Spread Electric Cooperative** Grand River Dam Authority Greater Missouri Operations Company (KCP&L) Harlan Municipal Utilities Heartland Consumers Power District **Independence Power & Light** Kansas City Board of Public Utilities Kansas City Power & Light Kansas Municipal Energy Agency – EMP1 Kansas Municipal Energy Agency – EMP2 Kansas Municipal Energy Agency – EMP3 Kansas Municipal Energy Agency - Eudora Kansas Power Pool Kennett Board of Public Works Lincoln Electric System MidAmerican Energy Company Midwest Energy Missouri Joint Municipal Electric Utility Commission **Missouri River Energy Services** Municipal Energy Agency of Nebraska Nebraska City Utilities Nebraska Public Power District Northwestern Energy Schedule JAR-4

NSP Energy Marketing (All load being served with Firm Power contracts – 1 MW of Peak Demand)

Oklahoma Gas & Electric Company

Oklahoma Municipal Power Authority

Omaha Public Power District

Paragould Light and Water (All load being served with Firm Power contracts – 114 MW of Peak Demand)

People's Electric Cooperative

South Sioux City Nebraska

Southwestern Power Administration

Southwestern Public Service Company

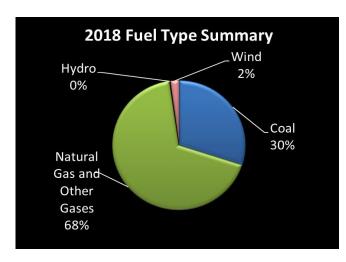
Sunflower Electric Power Corporation

Westar Energy

Western Area Power Administration

Western Farmers Energy Services

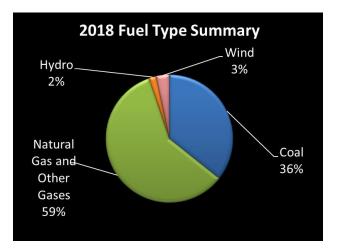
AMERICAN ELECTRIC POWER



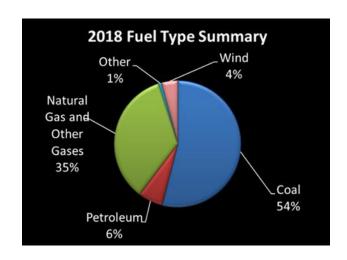
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	8,977
Firm Capacity Purchases	MW	1,865
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	71
Firm Capacity	MW	10,771
Demand Summary		
Peak Demand (Forecasted)	MW	8,959
Firm Power Purchases	MW	213
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	114
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	8,632
Requirements Summary		
Resource Adequacy Requirement	MW	9,668
Excess Capacity	MW	1,103
Deficient Capacity	MW	0
Planning Reserve Margin	%	24.8%
SPP Target Planning Reserve Margin	%	12.0%

ARKANSAS ELECTRIC COPERATIVE COOPERATION

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	726
Firm Capacity Purchases	MW	201
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	927
Demand Summary		
Peak Demand (Forecasted)	MW	944
Firm Power Purchases	MW	189
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	23
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	732
Requirements Summary		
Resource Adequacy Requirement	MW	820
Excess Capacity	MW	107
Deficient Capacity	MW	0
Planning Reserve Margin	%	26.7%
SPP Target Planning Reserve Margin Schedule JAR-4	%	12.0%
Schedule JAR-4		



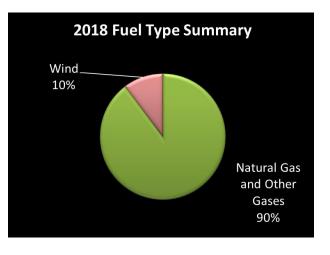
BASIN ELECTRIC POWER COOPERATIVE



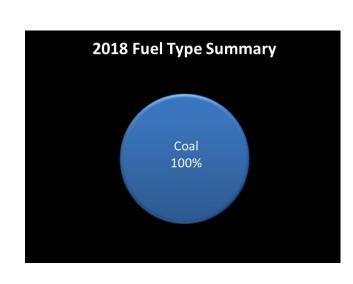
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	3,088
Firm Capacity Purchases	MW	384
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	240
Other Capacity Adjustments - Reductions	MW	85
Firm Capacity	MW	3,626
Demand Summary		
Peak Demand (Forecasted)	MW	2,878
Firm Power Purchases	MW	4
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	6
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	2,869
Requirements Summary		
Resource Adequacy Requirement	MW	3,213
Excess Capacity	MW	413
Deficient Capacity	MW	0
Planning Reserve Margin	%	26.4%
SPP Target Planning Reserve Margin	%	12.0%

BIG RIVERS ELECTRIC CORPORATION

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	0
Firm Capacity Purchases	MW	39
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
	MW	Ŭ
Scheduled Outages Transmission Limitations		0
	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	39
Demand Summary		
Peak Demand (Forecasted)	MW	63
Firm Power Purchases	MW	51
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	12
Requirements Summary		
Resource Adequacy Requirement	MW	14
Excess Capacity	MW	25
Deficient Capacity	MW	0
Planning Reserve Margin	%	213.0%
SPP Target Planning Reserve Margin	%	12.0%
Schedule IAR-4		



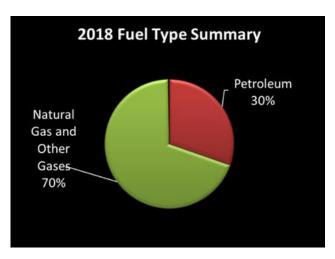
CARTHAGE WATER & ELECTRIC PLANT



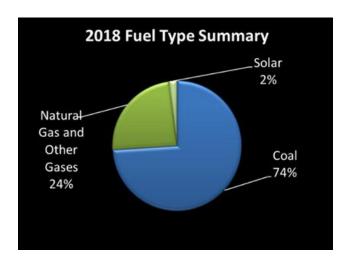
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	0
Firm Capacity Purchases	MW	45
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	45
Demand Summary		
Peak Demand (Forecasted)	MW	64
Firm Power Purchases	MW	7
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	19
Net Peak Demand (Forecasted)	MW	38
Requirements Summary		
Resource Adequacy Requirement	MW	42
Excess Capacity	MW	3
Deficient Capacity	MW	0
Planning Reserve Margin	%	20.0%
SPP Target Planning Reserve Margin	%	12.0%

CITY OF CHANUTE

	Unit	2018
Firm Capacity Summary		
Firm Capacity Resources	MW	116
Firm Capacity Purchases	MW	47
Firm Capacity Sales	MW	15
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	148
Demand Summary		
Peak Demand (Forecasted)	MW	91
Firm Power Purchases	MW	2
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	89
Requirements Summary		
Resource Adequacy Requirement	MW	100
Excess Capacity	MW	48
Deficient Capacity	MW	0
Planning Reserve Margin	%	65.4%
SPP Target Planning Reserve Margin Schedule JAR-4	%	12.0%
Schedule JAR-4		



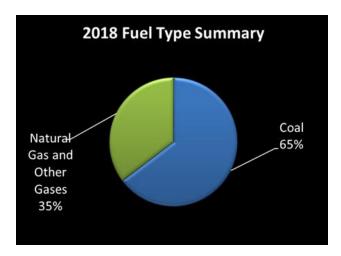
CITY OF FREMONT



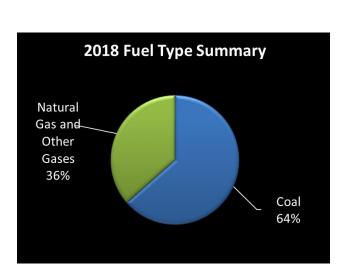
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	158
Firm Capacity Purchases	MW	0
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	158
Demand Summary		
Peak Demand (Forecasted)	MW	96
Firm Power Purchases	MW	5
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	91
Requirements Summary		
Resource Adequacy Requirement	MW	102
Excess Capacity	MW	56
Deficient Capacity	MW	0
Planning Reserve Margin	%	73.6%
SPP Target Planning Reserve Margin	%	12.0%

CITY OF GRAND ISLAND NEBRASKA UTILITIES

Firm Conscitut Summary	Linit	2010
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	197
Firm Capacity Purchases	MW	35
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	231
Demand Summary		
Peak Demand (Forecasted)	MW	168
Firm Power Purchases	MW	9
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	159
Requirements Summary		
Resource Adequacy Requirement	MW	178
Excess Capacity	MW	53
Deficient Capacity	MW	0
Planning Reserve Margin	%	45.2%
SPP Target Planning Reserve Margin Schedule JAR-4	%	12.0%
Schedule JAR-4		



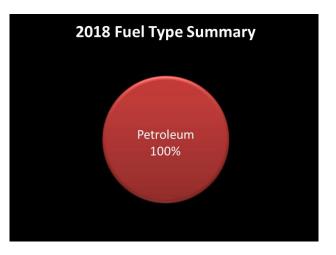
CITY OF HASTINGS NEBRASKA UTILITIES



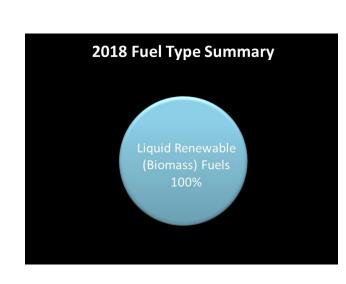
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	159
Firm Capacity Purchases	MW	0
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	159
Demand Summary		
Peak Demand (Forecasted)	MW	91
Firm Power Purchases	MW	12
Firm Power Sales	MW	2
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	82
Requirements Summary		
Resource Adequacy Requirement	MW	91
Excess Capacity	MW	68
Deficient Capacity	MW	0
Planning Reserve Margin	%	94.9%
SPP Target Planning Reserve Margin	%	12.0%

CITY OF MALDEN BOARD OF PUBLIC WORKS

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	16
Firm Capacity Purchases	MW	4
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	20
Demand Summary		
Peak Demand (Forecasted)	MW	11
Firm Power Purchases	MW	5
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	6
Requirements Summary		
Resource Adequacy Requirement	MW	7
Excess Capacity	MW	13
Deficient Capacity	MW	0
Planning Reserve Margin	%	217.5%
SPP Target Planning Reserve Margin	%	12.0%
Schedule JAR-4		



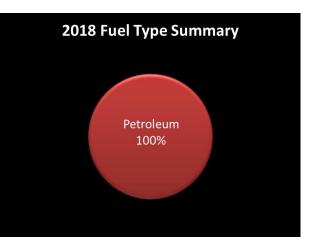
CITY OF NELIGH



Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	6
Firm Capacity Purchases	MW	0
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	6
Demand Summary		
Peak Demand (Forecasted)	MW	5
Firm Power Purchases	MW	0
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	5
Requirements Summary		
Resource Adequacy Requirement	MW	5
Excess Capacity	MW	0
Deficient Capacity	MW	0
Planning Reserve Margin	%	22.6%
SPP Target Planning Reserve Margin	%	12.0%

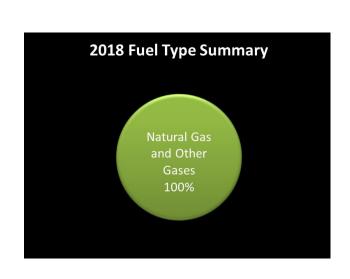
CITY OF PIGGOTT MUNICIPAL LIGHT & WATER

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	7
Firm Capacity Purchases	MW	6
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	13
Demand Summary		
Peak Demand (Forecasted)	MW	9
Firm Power Purchases	MW	5
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	4
Requirements Summary		
Resource Adequacy Requirement	MW	5
Excess Capacity	MW	8
Deficient Capacity	MW	0
Planning Reserve Margin	%	200.0%
SPP Target Planning Reserve Margin	%	12.0%
Schedule JAR-4		



Schedule JAR-S₁ 15/35

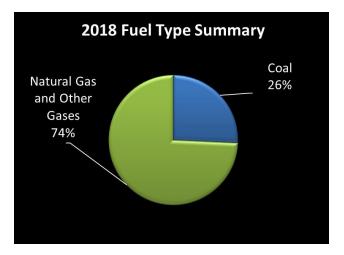
CITY OF POPLAR BLUFF MUNICIPAL UTILITIES



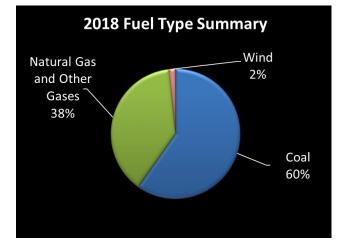
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	34
Firm Capacity Purchases	MW	20
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	54
Demand Summary		
Peak Demand (Forecasted)	MW	82
Firm Power Purchases	MW	80
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	3
Requirements Summary		
Resource Adequacy Requirement	MW	3
Excess Capacity	MW	51
Deficient Capacity	MW	0
Planning Reserve Margin	%	2044.0%
SPP Target Planning Reserve Margin	%	12.0%

CITY OF WEST PLAINS BOARD OF PUBLIC WORKS

Firm Canacity Summary	Unit	2018
Firm Capacity Summary	MW	
Firm Capacity Resources		52
Firm Capacity Purchases	MW	18
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	70
Demand Summary		
Peak Demand (Forecasted)	MW	42
Firm Power Purchases	MW	15
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	27
Requirements Summary		
Resource Adequacy Requirement	MW	31
Excess Capacity	MW	39
Deficient Capacity	MW	0
Planning Reserve Margin	%	154.7%
SPP Target Planning Reserve Margin	%	12.0%
Schedule JAR-4		



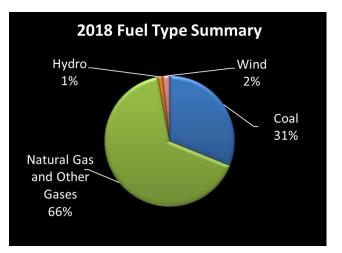
CITY UTILITIES OF SPRINGFIELD



Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	915
Firm Capacity Purchases	MW	15
Firm Capacity Sales	MW	70
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	860
Demand Summary		
Peak Demand (Forecasted)	MW	769
Firm Power Purchases	MW	55
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	714
Requirements Summary		
Resource Adequacy Requirement	MW	799
Excess Capacity	MW	61
Deficient Capacity	MW	0
Planning Reserve Margin	%	20.5%
SPP Target Planning Reserve Margin	%	12.0%

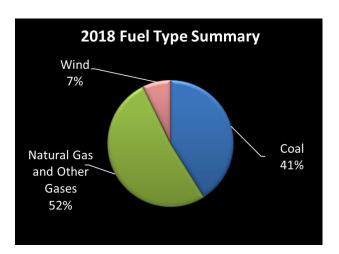
EMPIRE DISTRICT ELECTRIC COMPANY

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	1,401
Firm Capacity Purchases	MW	60
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	1,461
Demand Summary		
Peak Demand (Forecasted)	MW	1,106
Firm Power Purchases	MW	1
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	8
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	1,097
Requirements Summary		
Resource Adequacy Requirement	MW	1,229
Excess Capacity	MW	232
Deficient Capacity	MW	0
Planning Reserve Margin	%	33.2%
SPP Target Planning Reserve Margin Schedule JAR-4	%	12.0%
Schedule JAR-4		



Schedule JAR-S₁ 17/35

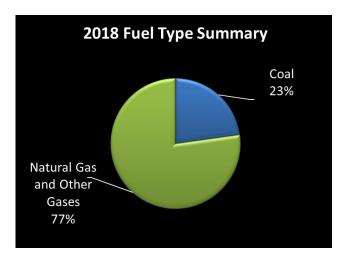
ETEC/NTEC/TEX-LA



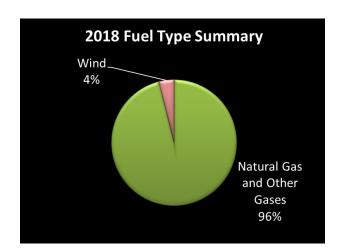
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	685
Firm Capacity Purchases	MW	57
Firm Capacity Sales	MW	498
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	244
Demand Summary		
Peak Demand (Forecasted)	MW	199
Firm Power Purchases	MW	103
Firm Power Sales	MW	102
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	198
Requirements Summary		
Resource Adequacy Requirement	MW	222
Excess Capacity	MW	22
Deficient Capacity	MW	0
Planning Reserve Margin	%	23.2%
SPP Target Planning Reserve Margin	%	12.0%

FALLS CITY UTILITIES

Firm Canacity Summary	Unit	2018
Firm Capacity Summary	MW	19
Firm Capacity Resources		
Firm Capacity Purchases	MW	6
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	25
Demand Summary		
Peak Demand (Forecasted)	MW	15
Firm Power Purchases	MW	3
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	12
Requirements Summary		
Resource Adequacy Requirement	MW	13
Excess Capacity	MW	12
Deficient Capacity	MW	0
Planning Reserve Margin	%	113.5%
SPP Target Planning Reserve Margin	%	12.0%
Schedule JAR-4		



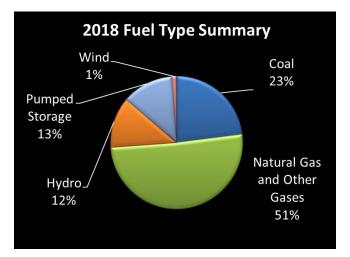
GOLDEN SPREAD ELECTRIC COOPERATIVE



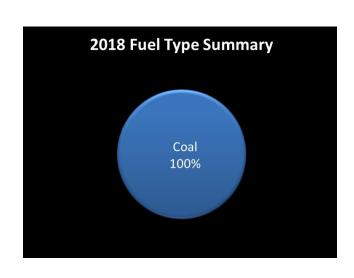
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	1,429
Firm Capacity Purchases	MW	50
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	1,479
Demand Summary		
Peak Demand (Forecasted)	MW	1,406
Firm Power Purchases	MW	63
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	52
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	1,290
Requirements Summary		
Resource Adequacy Requirement	MW	1,445
Excess Capacity	MW	34
Deficient Capacity	MW	0
Planning Reserve Margin	%	14.6%
SPP Target Planning Reserve Margin	%	12.0%

GRAND RIVER DAM AUTHORITY

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	2,047
Firm Capacity Purchases	MW	25
Firm Capacity Sales	MW	22
Confirmed Retirements	MW	0
Scheduled Outages	MW	74
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	1,976
Demand Summary		
Peak Demand (Forecasted)	MW	978
Firm Power Purchases	MW	13
Firm Power Sales	MW	443
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	30
Net Peak Demand (Forecasted)	MW	1,378
Requirements Summary		
Resource Adequacy Requirement	MW	1,543
Excess Capacity	MW	433
Deficient Capacity	MW	0
Planning Reserve Margin	%	43.4%
SPP Target Planning Reserve Margin	%	12.0%



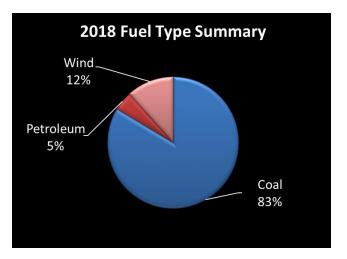
HARLAN MUNICIPAL UTILITIES



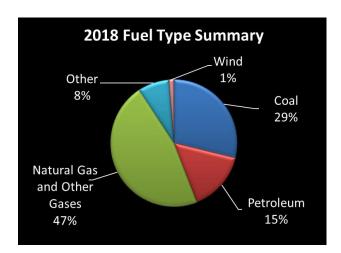
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	6
Firm Capacity Purchases	MW	0
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	6
Demand Summary		
Peak Demand (Forecasted)	MW	14
Firm Power Purchases	MW	10
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	4
Requirements Summary		
Resource Adequacy Requirement	MW	4
Excess Capacity	MW	2
Deficient Capacity	MW	0
Planning Reserve Margin	%	56.8%
SPP Target Planning Reserve Margin	%	12.0%

HEARTLAND CONSUMERS POWER DISTRICT

	11	2010
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	135
Firm Capacity Purchases	MW	14
Firm Capacity Sales	MW	95
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	53
Demand Summary		
Peak Demand (Forecasted)	MW	34
Firm Power Purchases	MW	0
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	34
Requirements Summary		
Resource Adequacy Requirement	MW	38
Excess Capacity	MW	15
Deficient Capacity	MW	0
Planning Reserve Margin	%	55.0%
SPP Target Planning Reserve Margin Schedule JAR-4	%	12.0%
Schedule JAR-4		



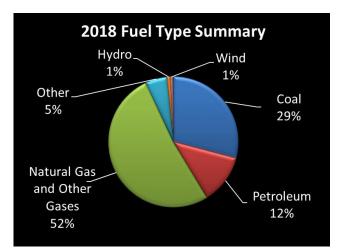
INDEPENDENCE POWER & LIGHT



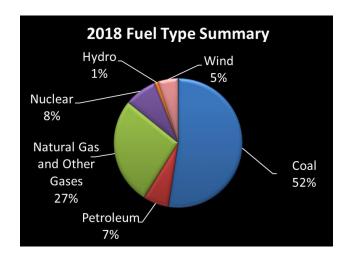
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	268
Firm Capacity Purchases	MW	116
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	384
Demand Summary		
Peak Demand (Forecasted)	MW	305
Firm Power Purchases	MW	0
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	305
Requirements Summary		
Resource Adequacy Requirement	MW	341
Excess Capacity	MW	43
Deficient Capacity	MW	0
Planning Reserve Margin	%	26.0%
SPP Target Planning Reserve Margin	%	12.0%

KANSAS CITY BOARD OF PUBLIC UTILITIES

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	814
Firm Capacity Purchases	MW	9
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	823
Demand Summary		023
Peak Demand (Forecasted)	MW	482
Firm Power Purchases	MW	43
Firm Power Sales	MW	
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	439
Requirements Summary		435
Resource Adequacy Requirement	MW	491
Excess Capacity	MW	331
Deficient Capacity	MW	0
	<u> </u>	87.5%
Planning Reserve Margin	7 0 %	12.0%
SPP Target Planning Reserve Margin Schedule JAR-4	70	12.0%
Schuure JAR-4		



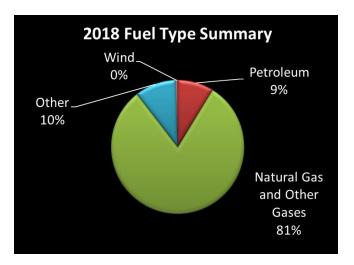
KANSAS CITY POWER & LIGHT



Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	6,381
Firm Capacity Purchases	MW	391
Firm Capacity Sales	MW	52
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	6,720
Demand Summary		
Peak Demand (Forecasted)	MW	5,483
Firm Power Purchases	MW	0
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	239
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	5,244
Requirements Summary		
Resource Adequacy Requirement	MW	5,874
Excess Capacity	MW	846
Deficient Capacity	MW	0
Planning Reserve Margin	%	28.1%
SPP Target Planning Reserve Margin	%	12.0%

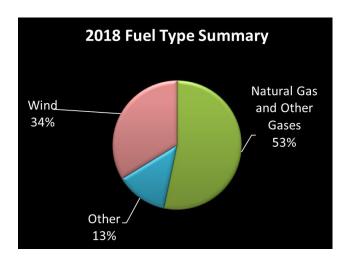
KANSAS MUNICIPAL ENERGY AGENCY – EMP1

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	82
Firm Capacity Purchases	MW	21
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	103
Demand Summary		
Peak Demand (Forecasted)	MW	106
Firm Power Purchases	MW	38
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	29
Net Peak Demand (Forecasted)	MW	39
Requirements Summary		
Resource Adequacy Requirement	MW	43
Excess Capacity	MW	59
Deficient Capacity	MW	0
Planning Reserve Margin	%	164.8%
SPP Target Planning Reserve Margin	%	12.0%
Schedule JAR-4		



Schedule JAR-S_L 22/35

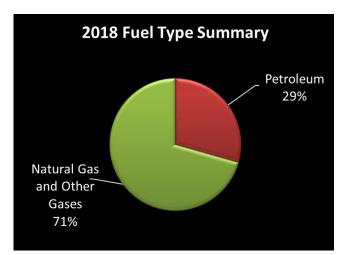
KANSAS MUNICIPAL ENERGY AGENCY – EMP2



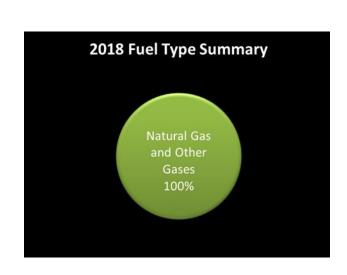
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	88
Firm Capacity Purchases	MW	67
Firm Capacity Sales	MW	41
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	114
Demand Summary		
Peak Demand (Forecasted)	MW	178
Firm Power Purchases	MW	30
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	61
Net Peak Demand (Forecasted)	MW	88
Requirements Summary		
Resource Adequacy Requirement	MW	98
Excess Capacity	MW	15
Deficient Capacity	MW	0
Planning Reserve Margin	%	29.6%
SPP Target Planning Reserve Margin	%	12.0%

KANSAS MUNICIPAL ENERGY AGENCY – EMP3

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	23
Firm Capacity Purchases	MW	0
Firm Capacity Sales	MW	5
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	18
Demand Summary		
Peak Demand (Forecasted)	MW	84
Firm Power Purchases	MW	23
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	53
Net Peak Demand (Forecasted)	MW	8
Requirements Summary		
Resource Adequacy Requirement	MW	9
Excess Capacity	MW	9
Deficient Capacity	MW	0
Planning Reserve Margin	%	119.2%
SPP Target Planning Reserve Margin Schedule JAR-4	%	12.0%
Schedule JAR-4		



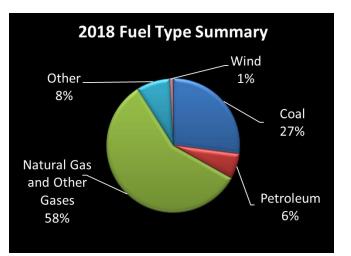
KANSAS MUNICIPAL ENERGY AGENCY – EUDORA



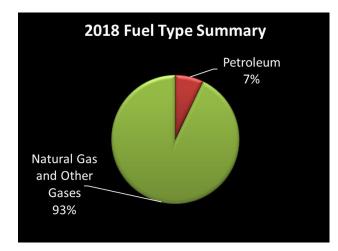
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	0
Firm Capacity Purchases	MW	15
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	15
Demand Summary		
Peak Demand (Forecasted)	MW	13
Firm Power Purchases	MW	1
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	12
Requirements Summary		
Resource Adequacy Requirement	MW	13
Excess Capacity	MW	2
Deficient Capacity	MW	0
Planning Reserve Margin	%	26.1%
SPP Target Planning Reserve Margin	%	12.0%

KANSAS POWER POOL

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	221
Firm Capacity Purchases	MW	61
Firm Capacity Sales	MW	50
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	231
Demand Summary		
Peak Demand (Forecasted)	MW	218
Firm Power Purchases	MW	23
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	195
Requirements Summary		
Resource Adequacy Requirement	MW	218
Excess Capacity	MW	13
Deficient Capacity	MW	0
Planning Reserve Margin	%	18.8%
SPP Target Planning Reserve Margin	%	12.0%
Schedule JAR-4		



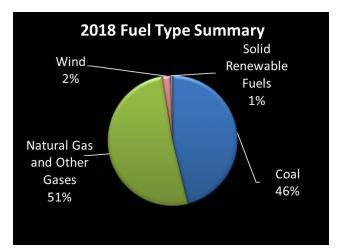
KENNETT BOARD OF PUBLIC WORKS



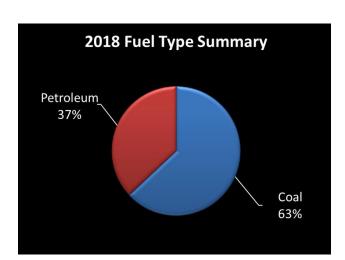
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	41
Firm Capacity Purchases	MW	0
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	41
Demand Summary		
Peak Demand (Forecasted)	MW	33
Firm Power Purchases	MW	11
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	22
Requirements Summary		
Resource Adequacy Requirement	MW	25
Excess Capacity	MW	16
Deficient Capacity	MW	0
Planning Reserve Margin	%	84.2%
SPP Target Planning Reserve Margin	%	12.0%

LINCOLN ELECTRIC SYSTEM

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	749
Firm Capacity Purchases	MW	177
Firm Capacity Sales	MW	78
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	847
Demand Summary		
Peak Demand (Forecasted)	MW	767
Firm Power Purchases	MW	127
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	640
Requirements Summary		
Resource Adequacy Requirement	MW	717
Excess Capacity	MW	130
Deficient Capacity	MW	0
Planning Reserve Margin	%	32.3%
SPP Target Planning Reserve Margin	%	12.0%
Schedule JAR-4		



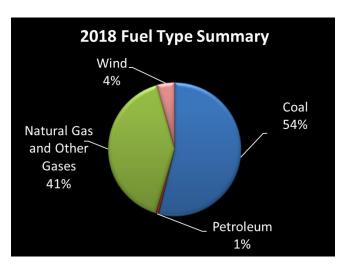
MIDAMERICAN ENERGY COMPANY



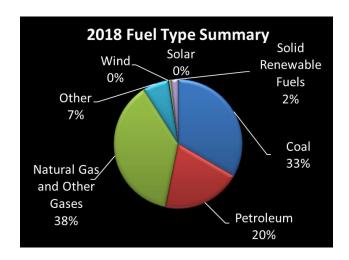
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	62
Firm Capacity Purchases	MW	0
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	62
Demand Summary		
Peak Demand (Forecasted)	MW	51
Firm Power Purchases	MW	0
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	51
Requirements Summary		
Resource Adequacy Requirement	MW	58
Excess Capacity	MW	5
Deficient Capacity	MW	0
Planning Reserve Margin	%	21.1%
SPP Target Planning Reserve Margin	%	12.0%

MIDWEST ENERGY

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	117
Firm Capacity Purchases	MW	282
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	398
Demand Summary		
Peak Demand (Forecasted)	MW	374
Firm Power Purchases	MW	7
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	28
Net Peak Demand (Forecasted)	MW	339
Requirements Summary		
Resource Adequacy Requirement	MW	379
Excess Capacity	MW	19
Deficient Capacity	MW	0
Planning Reserve Margin	%	17.5%
SPP Target Planning Reserve Margin	%	12.0%
Schedule JAR-4		



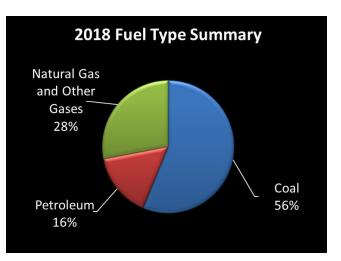
MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION



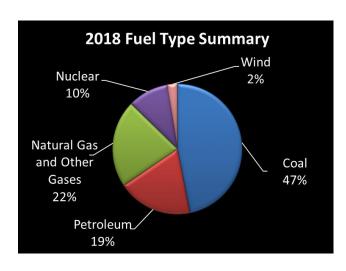
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	649
Firm Capacity Purchases	MW	209
Firm Capacity Sales	MW	73
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	784
Demand Summary		
Peak Demand (Forecasted)	MW	553
Firm Power Purchases	MW	24
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	529
Requirements Summary		
Resource Adequacy Requirement	MW	593
Excess Capacity	MW	191
Deficient Capacity	MW	0
Planning Reserve Margin	%	48.2%
SPP Target Planning Reserve Margin	%	12.0%

MISSOURI RIVER ENERGY SERVICES

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	500
Firm Capacity Purchases	MW	0
Firm Capacity Sales	MW	39
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	461
Demand Summary		
Peak Demand (Forecasted)	MW	234
Firm Power Purchases	MW	0
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	234
Requirements Summary		
Resource Adequacy Requirement	MW	262
Excess Capacity	MW	199
Deficient Capacity	MW	0
Planning Reserve Margin	%	97.0%
SPP Target Planning Reserve Margin	%	12.0%
Schedule JAR-4		



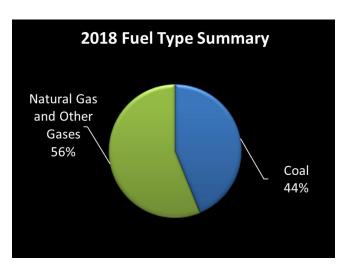
MUNICIPAL ENERGY AGENCY OF NEBRASKA



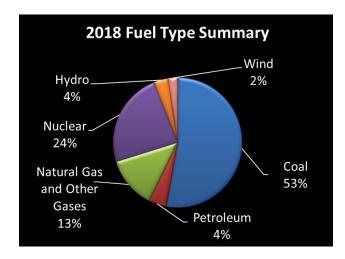
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	188
Firm Capacity Purchases	MW	66
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	254
Demand Summary		
Peak Demand (Forecasted)	MW	163
Firm Power Purchases	MW	20
Firm Power Sales	MW	58
Controllable and Dispatchable DR	MW	4
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	197
Requirements Summary		
Resource Adequacy Requirement	MW	220
Excess Capacity	MW	34
Deficient Capacity	MW	0
Planning Reserve Margin	%	29.3%
SPP Target Planning Reserve Margin	%	12.0%

NEBRASKA CITY UTILITIES

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	38
Firm Capacity Purchases	MW	12
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
	MW	0
Scheduled Outages Transmission Limitations	MW	Ŭ
	MW	0
Other Capacity Adjustments - Addition		0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	49
Demand Summary		
Peak Demand (Forecasted)	MW	37
Firm Power Purchases	MW	8
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	29
Requirements Summary		
Resource Adequacy Requirement	MW	32
Excess Capacity	MW	17
Deficient Capacity	MW	0
Planning Reserve Margin	%	70.1%
SPP Target Planning Reserve Margin Schedule JAR-4	%	12.0%
Schedule JAR-4		



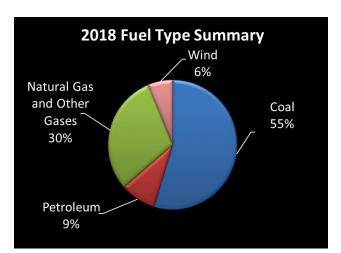
NEBRASKA PUBLIC POWER DISTRICT



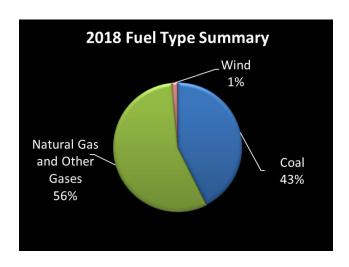
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	3,036
Firm Capacity Purchases	MW	284
Firm Capacity Sales	MW	206
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	3,115
Demand Summary		
Peak Demand (Forecasted)	MW	2,999
Firm Power Purchases	MW	469
Firm Power Sales	MW	72
Controllable and Dispatchable DR	MW	96
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	2,505
Requirements Summary		
Resource Adequacy Requirement	MW	2,806
Excess Capacity	MW	309
Deficient Capacity	MW	0
Planning Reserve Margin	%	24.3%
SPP Target Planning Reserve Margin	%	12.0%

NORTHWESTERN ENERGY

Firm Capacity ResourcesMW378Firm Capacity PurchasesMW39Firm Capacity SalesMW0Confirmed RetirementsMW0Scheduled OutagesMW0Transmission LimitationsMW0Other Capacity Adjustments - AdditionMW0Other Capacity Adjustments - ReductionsMW0Firm Capacity Adjustments - ReductionsMW0Firm Capacity Adjustments - ReductionsMW0Other Capacity Adjustments - ReductionsMW0Firm CapacityMW417Demand SummaryU0Firm Power PurchasesMW0Firm Power SalesMW0Other Controllable and Dispatchable DRMW0Other Controllable and Dispatchable DEGMW0Net Peak Demand (Forecasted)MW336Requirements SummaryU336Resource Adequacy RequirementMW377Excess CapacityMW0Planning Reserve Margin%24.2%SPP Target Planning Reserve Margin%12.0%	Firm Capacity Summary	Unit	2018
Firm Capacity PurchasesMW39Firm Capacity SalesMW0Confirmed RetirementsMW0Scheduled OutagesMW0Scheduled OutagesMW0Other Capacity Adjustments - AdditionMW0Other Capacity Adjustments - ReductionsMW0Other Capacity Adjustments - ReductionsMW0Firm CapacityMW0Firm CapacityMW0Firm Power SalesMW0Firm Power SalesMW0Other Controllable and Dispatchable DEGMW0Other Controllable and Pispatchable DEGMW336Requirements Summary3377Excess CapacityMW411Deficient CapacityMW0Planning Reserve Margin%24.2%			
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Requirements SummaryResource Adequacy RequirementMW377Excess CapacityMW41Deficient CapacityMW0Planning Reserve Margin%24.2%	· ·		
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Excess CapacityMW41Deficient CapacityMW0Planning Reserve Margin%24.2%		N // \ \ /	277
Deficient Capacity MW 0 Planning Reserve Margin % 24.2%			
Planning Reserve Margin % 24.2%			
			<u> </u>
SPP Target Planning Reserve Margin % 12.0%			/•
	SPP Target Planning Reserve Margin	%	12.0%



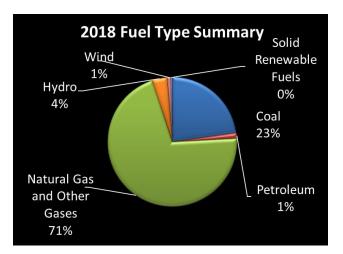
OKLAHOMA GAS & ELECTRIC COMPANY



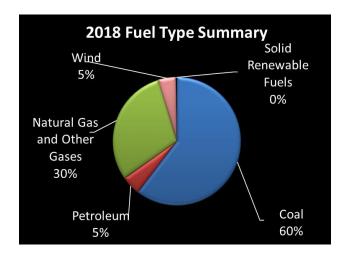
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	6,707
Firm Capacity Purchases	MW	21
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	6,728
Demand Summary		
Peak Demand (Forecasted)	MW	5,896
Firm Power Purchases	MW	6
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	5,890
Requirements Summary		
Resource Adequacy Requirement	MW	6,597
Excess Capacity	MW	132
Deficient Capacity	MW	0
Planning Reserve Margin	%	14.2%
SPP Target Planning Reserve Margin	%	12.0%

OKLAHOMA MUNICIPAL POWER AUTHORITY

Firm Conscitut Summary	Unit	2018
Firm Capacity Summary		
Firm Capacity Resources	MW	712
Firm Capacity Purchases	MW	77
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	789
Demand Summary		
Peak Demand (Forecasted)	MW	753
Firm Power Purchases	MW	162
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	591
Requirements Summary		
Resource Adequacy Requirement	MW	662
Excess Capacity	MW	127
Deficient Capacity	MW	0
Planning Reserve Margin	%	33.5%
SPP Target Planning Reserve Margin Schedule JAR-4	%	12.0%
Schedule JAR-4		



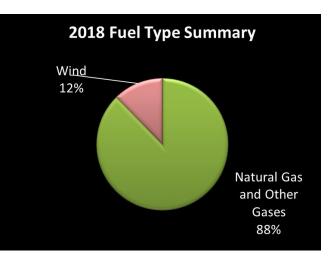
OMAHA PUBLIC POWER DISTRICT



Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	2,698
Firm Capacity Purchases	MW	311
Firm Capacity Sales	MW	366
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	2,643
Demand Summary		
Peak Demand (Forecasted)	MW	2,359
Firm Power Purchases	MW	87
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	90
Other Controllable and Dispatchable DEG	MW	30
Net Peak Demand (Forecasted)	MW	2,152
Requirements Summary		
Resource Adequacy Requirement	MW	2,410
Excess Capacity	MW	233
Deficient Capacity	MW	0
Planning Reserve Margin	%	22.8%
SPP Target Planning Reserve Margin	%	12.0%

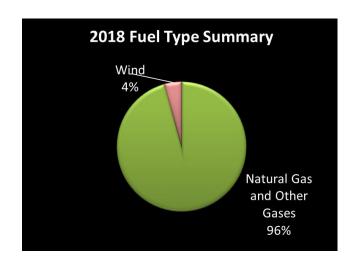
PEOPLE'S ELECTRIC COOPERATIVE

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	75
Firm Capacity Purchases	MW	96
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	171
Demand Summary		
Peak Demand (Forecasted)	MW	127
Firm Power Purchases	MW	13
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	114
Requirements Summary		
Resource Adequacy Requirement	MW	128
Excess Capacity	MW	43
Deficient Capacity	MW	0
Planning Reserve Margin	%	49.6%
SPP Target Planning Reserve Margin	%	12.0%
Schedule JAR-4		



Schedule JAR-Szt 31/35

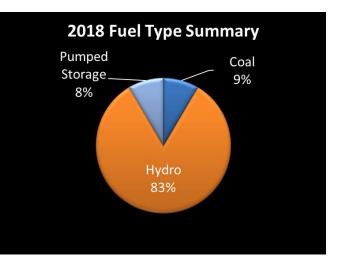
SOUTH SIOUX CITY NEBRASKA



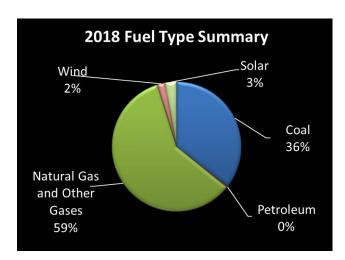
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	0
Firm Capacity Purchases	MW	19
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	19
Demand Summary		
Peak Demand (Forecasted)	MW	42
Firm Power Purchases	MW	30
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	13
Requirements Summary		
Resource Adequacy Requirement	MW	14
Excess Capacity	MW	5
Deficient Capacity	MW	0
Planning Reserve Margin	%	49.6%
SPP Target Planning Reserve Margin	%	12.0%

SOUTHWESTERN POWER ADMINISTRATION

		2040
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	2,280
Firm Capacity Purchases	MW	213
Firm Capacity Sales	MW	80
Confirmed Retirements	MW	0
Scheduled Outages	MW	46
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	165
Firm Capacity	MW	2,202
Demand Summary		
Peak Demand (Forecasted)	MW	157
Firm Power Purchases	MW	0
Firm Power Sales	MW	1,834
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	1,991
Requirements Summary		
Resource Adequacy Requirement	MW	2,188
Excess Capacity	MW	14
Deficient Capacity	MW	0
Planning Reserve Margin	%	10.6%
SPP Target Planning Reserve Margin Schedule JAR-4	%	9.9%
Schedule JAR-4		



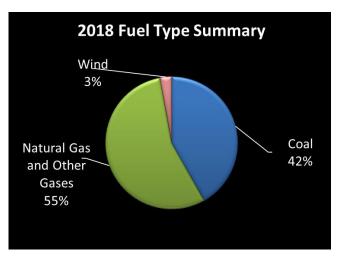
SOUTHWESTERN PUBLIC SERVICE COMPANY



Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	4,490
Firm Capacity Purchases	MW	1,503
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	5,993
Demand Summary		
Peak Demand (Forecasted)	MW	4,581
Firm Power Purchases	MW	171
Firm Power Sales	MW	63
Controllable and Dispatchable DR	MW	30
Other Controllable and Dispatchable DEG	MW	3
Net Peak Demand (Forecasted)	MW	4,440
Requirements Summary		
Resource Adequacy Requirement	MW	4,973
Excess Capacity	MW	1,020
Deficient Capacity	MW	0
Planning Reserve Margin	%	35.0%
SPP Target Planning Reserve Margin	%	12.0%

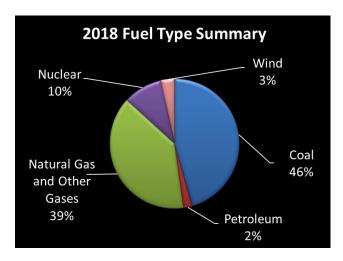
SUNFLOWER ELECTRIC POWER CORPORATION

Firm Concerts Concernant	Lint	2010
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	1,042
Firm Capacity Purchases	MW	218
Firm Capacity Sales	MW	64
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	1,196
Demand Summary		
Peak Demand (Forecasted)	MW	971
Firm Power Purchases	MW	0
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	971
Requirements Summary		
Resource Adequacy Requirement	MW	1,087
Excess Capacity	MW	109
Deficient Capacity	MW	0
Planning Reserve Margin	%	23.2%
SPP Target Planning Reserve Margin Schedule JAR-4	%	12.0%
Schedule JAR-4		



Schedule JAR-S₃ 33/35

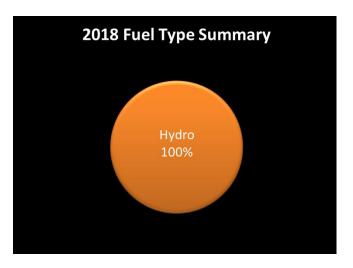
WESTAR ENERGY



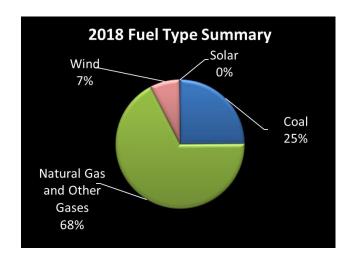
Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	6,553
Firm Capacity Purchases	MW	404
Firm Capacity Sales	MW	735
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	6,222
Demand Summary		
Peak Demand (Forecasted)	MW	5,310
Firm Power Purchases	MW	123
Firm Power Sales	MW	0
Controllable and Dispatchable DR	MW	247
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	4,940
Requirements Summary		
Resource Adequacy Requirement	MW	5,533
Excess Capacity	MW	688
Deficient Capacity	MW	0
Planning Reserve Margin	%	25.9%
SPP Target Planning Reserve Margin	%	12.0%

WESTERN AREA POWER ADMINISTRATION

Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	2,406
	MW	2,400
Firm Capacity Purchases	MW	440
Firm Capacity Sales Confirmed Retirements	MW	
		0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Addition	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	1,968
Demand Summary		
Peak Demand (Forecasted)	MW	888
Firm Power Purchases	MW	144
Firm Power Sales	MW	763
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	0
Net Peak Demand (Forecasted)	MW	1,507
Requirements Summary		
Resource Adequacy Requirement	MW	1,656
Excess Capacity	MW	312
Deficient Capacity	MW	0
Planning Reserve Margin	%	30.6%
SPP Target Planning Reserve Margin Schedule JAR-4	%	9.89%
Schedule JAR-4		



WESTERN FARMERS ENERGY SERVICES



Firm Capacity Summary	Unit	2018
Firm Capacity Resources	MW	1,368
Firm Capacity Purchases	MW	382
Firm Capacity Sales	MW	0
Confirmed Retirements	MW	0
Scheduled Outages	MW	0
Transmission Limitations	MW	0
Other Capacity Adjustments - Additions	MW	0
Other Capacity Adjustments - Reductions	MW	0
Firm Capacity	MW	1,751
Demand Summary		
Peak Demand (Forecasted)	MW	1,517
Firm Power Purchases	MW	460
Firm Power Sales	MW	184
Controllable and Dispatchable DR	MW	0
Other Controllable and Dispatchable DEG	MW	43
Net Peak Demand (Forecasted)	MW	1,199
Requirements Summary		
Resource Adequacy Requirement	MW	1,342
Excess Capacity	MW	408
Deficient Capacity	MW	0
Planning Reserve Margin	%	46.1%
SPP Target Planning Reserve Margin	%	12.0%

Buckman, Jere

From:	Alex Crawford <acrawford@spp.org></acrawford@spp.org>
Sent:	Thursday, November 30, 2017 9:58 AM
То:	Randy Spale
Cc:	Chris Haley
Subject:	RE: 2018 Trushare Access & Deliverability study

This is an EXTERNAL EMAIL. Stop and think before clicking a link, opening attachments or entering credentials.

The KCPL workbook on Trueshare has been updated to include GMO's Deliverability Study Results. Let me know if you have any questions.

Thanks, Alex Crawford 501-482-2242

From: Randy Spale [mailto:Randy.Spale@kcpl.com]
Sent: Thursday, November 30, 2017 9:21 AM
To: Alex Crawford
Subject: **External Email** RE: 2018 Trushare Access & Deliverability study

Alex, Yes if that approach works. Thanks.

From: Alex Crawford [mailto:acrawford@spp.org]
Sent: Thursday, November 30, 2017 9:20 AM
To: Randy Spale <<u>Randy.Spale@kcpl.com</u>>
Cc: Chris Haley <<u>chaley@spp.org</u>>
Subject: RE: 2018 Trushare Access & Deliverability study

This is an EXTERNAL EMAIL. Stop and think before clicking a link, opening attachments or entering credentials.

Thank you for the information Randy. Would you like the RAW updated to have the Deliverability Study results into one RAW on Trueshare?

Alex Crawford 501-482-2242

From: Randy Spale [mailto:Randy.Spale@kcpl.com]
Sent: Tuesday, November 28, 2017 12:22 PM
To: Alex Crawford
Cc: Chris Haley
Subject: **External Email** 2018 Trushare Access & Deliverability study

Alex, for the upcoming RAW filing/process, it is our preference that KCP&L and GMO resources be included/combined in one RAW workbook as being under the KCPL market participant.

Thank you.

From: Alex Crawford [mailto:acrawford@spp.org]
Sent: Tuesday, December 20, 2016 9:59 AM
To: Spale Randy
Cc: McCool Patrick; Chris Haley
Subject: RE: Trushare Access & Deliverability study

Good morning Randy,

I have posted the Deliverability Study results for KCP&L and GMO in separate workbooks on <u>Trueshare</u>. Let me know if you have any questions or concerns.

Thank you,

Alex Crawford

501-482-2242

This email and any attachments are for the sole use of the intended recipient(s) and may contain confidential information. If you receive this email in error, please notify the sender, delete the original and all copies of the email and destroy any other hard copies of it.

KCPL GMO Case Name: 2018 GMO Rate Case Case Number: ER-2018-0146

Response to Robinett John Interrogatories - OPC_20180703 Date of Response: 7/23/2018

Question:8535

Related to the SPP Resource Adequacy Report, it is OPC's understanding that KCPL and GMO provided to SPP in 2017 separate resource adequacy submissions. Please provide a detailed description of why the 2018 submissions to SPP for resource adequacy were combined for KCPL and GMO.

Response:

To ensure Southwest Power Pool ("SPP") transmission service is available between KCP&L and GMO, on 5/31/13 the Companies submitted a service request to SPP for joint Network Integration Transmission Service (NITS). This transmission service would allow any combination of KCP&L and GMO's generating resources (i.e., "Designated Resources") to serve the KCP&L and GMO native load needs without requesting additional SPP transmission service. After review/study of the request by SPP, joint NITS was granted and service started 8/1/15. There are no additional transmission service charges required for this service.

SPP is currently in the process of modifying their resource adequacy requirements. These requirements help ensure there is sufficient generating capacity to reliably meet the SPP Balancing Authority area's peak demand. These requirements are detailed in the proposed Attachment AA to the SPP Open Access Transmission Tariff ("OATT"). SPP requested FERC approval of these changes to the OATT on March 30, 2018 (FERC Docket No. ER18-1268) and requested a July 1, 2018 effective date. FERC approval is currently pending.

Section 3.2 (6) of Attachment AA to the SPP OATT (included as an attachment, "Q8535_Attachment AA.pdf") allows Market Participants to aggregate the forecasted peak demands of Load Responsible Entities ("LREs") whose loads are served by a common set of Designated Resources for purposes of compliance with the SPP resource adequacy requirements. Since the start of the joint NITS, KCP&L and GMO loads are served by a common set of Designated Resources, KCP&L has an option to aggregate the forecasted KCP&L and GMO peak demands for resource adequacy purposes. This combined view reduces the chances that GMO or KCP&L on an individual basis would fail to meet the SPP resource adequacy requirement. For example, if GMO did not have sufficient capacity to meet the 12% reserve margin requirement and KCP&L had sufficient capacity to cover the shortfall, no penalties would be incurred by GMO for a failure to meet the resource adequacy requirement as compliance would be determined on a combined basis. While the Companies fully expect and

plan for GMO and KCP&L on an individual basis to meet their share of the SPP resource adequacy requirement, the 2018 resource adequacy filing to SPP was made on a combined basis.

Information Provided By: Burton Crawford, Director Energy Resource Management

<u>Attachment:</u> Q8535_Attachment AA.pdf Q8535_Verification.pdf

ER-2018-0145 and ER-2018-0146

KANSAS CITY POWER & LIGHT COMPANY and KANSAS CITY POWER LIGHT GREATER OPERATIONSCOMPANY

SCHEDULE JAR-S-4

HAS BEEN DEEMED

"CONFIDENTIAL"

IN ITS ENTIRETY

merger, and Merger Sub will merge with and into Westar, with Westar surviving such merger. Upon closing, pursuant to the Amended Merger Agreement, each outstanding share of Great Plains Energy's and Westar's common stock will be converted into the right to receive 0.5981 and 1.0, respectively, of validly issued, fully paid and nonassessable shares of common stock, no par value, of Holdco. Following the mergers, Holdco, with a new name that has yet to be established, will be the parent of Great Plains Energy's direct subsidiaries, including KCP&L, and Westar.

The anticipated merger has been structured as a merger of equals in a tax-free exchange of shares that involves no premium paid or received with respect to either Great Plains Energy or Westar. Following the completion of the anticipated merger, Westar shareholders will own approximately 52.5 percent and Great Plains Energy shareholders will own approximately 47.5 percent of the combined company.

Great Plains Energy's anticipated merger with Westar was unanimously approved by the Great Plains Energy Board and Westar Board of Directors, has received the approvals of each of Great Plains Energy's and Westar's shareholders and has received early termination of the waiting period under the HSR Act with respect to antitrust review. The anticipated merger remains subject to regulatory approvals from KCC, the MPSC, NRC, FERC and FCC; as well as other contractual conditions.

See Note 2 to the consolidated financial statements for more information regarding the anticipated merger and redemption of acquisition financing associated with the Original Merger Agreement.

Expected Plant Retirements

In June 2017, Great Plains Energy and KCP&L announced plans to retire KCP&L's Montrose Station and GMO's Sibley Station by December 31, 2018 and GMO's Lake Road No. 4/6 Unit by December 31, 2019. The decision to retire these generating units, which represent approximately 900 MWs of generating capacity, was primarily driven by the age of the plants, expected environmental compliance costs and expected future generation capacity needs. See Note 1 to the consolidated financial statements for more information regarding the retirement of Sibley No. 3 Unit.

Tax Reform

In December 2017, the U.S. Congress passed and President Donald Trump signed Public Law No. 115-97, commonly referred to as the Tax Cuts and Jobs Act (Tax Act). The Tax Act represents the first major reform in U.S. income tax law since 1986. Most notably, the Tax Act reduces the current top corporate income tax rate from 35% to 21% beginning in 2018, repeals the corporate Alternative Minimum Tax (AMT), makes existing AMT tax credit carryforwards refundable, and changes the deductibility and taxability of certain items, among other things. See Note 21 to the consolidated financial statements for more information regarding the impact of tax reform on Great Plains Energy and KCP&L.

Earnings Overview

Great Plains Energy had a loss available for common shareholders of \$143.5 million or \$0.67 per share in 2017 compared to earnings of \$273.5 million or \$1.61 per share in 2016. This decrease in earnings was largely driven by a number of non-recurring impacts due to the anticipated merger with Westar and the impacts of U.S. federal income tax reform. The specific drivers of the decrease in earnings were lower gross margin; higher depreciation expense; a loss on the settlement of the 7.00% Series B Mandatory Convertible Preferred Stock (Series B Preferred Stock) dividend make-whole provisions; a loss on extinguishment of debt related to the redemption of Great Plains Energy's \$4.3 billion senior notes; an increase in interest charges; higher income tax expense and increased preferred stock dividend requirements and redemption premium; partially offset by a decrease in injuries and damages expense due to settled litigation and an increase in interest income.

In addition, a higher number of average shares outstanding due to Great Plains Energy's registered public offering of 60.5 million shares of common stock in October 2016 diluted the 2017 loss per share by \$0.26.

For additional information regarding the change in earnings (loss), refer to the Great Plains Energy Results of Operations and the Electric Utility Results of Operations sections within this Management's Discussion and

GREAT PLAINS ENERGY INCORPORATED KANSAS CITY POWER & LIGHT COMPANY

Notes to Consolidated Financial Statements

The notes to consolidated financial statements that follow are a combined presentation for Great Plains Energy Incorporated and Kansas City Power & Light Company, both registrants under this filing. The terms "Great Plains Energy," "Company," "KCP&L" and "Companies" are used throughout this report. "Great Plains Energy" and the "Company" refer to Great Plains Energy Incorporated and its consolidated subsidiaries, unless otherwise indicated. "KCP&L" refers to Kansas City Power & Light Company and its consolidated subsidiaries. "Companies" refers to Great Plains Energy Incorporated and its consolidated subsidiaries.

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Organization

Great Plains Energy, a Missouri corporation incorporated in 2001, is a public utility holding company and does not own or operate any significant assets other than the stock of its subsidiaries and cash and cash equivalents. Great Plains Energy's wholly owned direct subsidiaries with significant operations are as follows:

- KCP&L is an integrated, regulated electric utility that provides electricity to customers primarily in the states of Missouri and Kansas. KCP&L has one active wholly owned subsidiary, Kansas City Power & Light Receivables Company (KCP&L Receivables Company).
 - KCP&L Greater Missouri Operations Company (GMO) is an integrated, regulated electric utility that provides electricity to
 customers in the state of Missouri. GMO also provides regulated steam service to certain customers in the St. Joseph,
 Missouri area. GMO has two active wholly owned subsidiaries, GMO Receivables Company and MPS Merchant Services,
 Inc. (MPS Merchant). MPS Merchant has certain long-term natural gas contracts remaining from its former non-regulated
 trading operations.

Great Plains Energy also wholly owns GPE Transmission Holding Company, LLC (GPETHC). GPETHC owns 13.5% of Transource Energy, LLC (Transource) with the remaining 86.5% owned by AEP Transmission Holding Company, LLC (AEPTHC), a subsidiary of American Electric Power Company, Inc. GPETHC accounts for its investment in Transource under the equity method. Transource is focused on the development of competitive electric transmission projects.

Each of Great Plains Energy's and KCP&L's consolidated financial statements includes the accounts of their subsidiaries. Intercompany transactions have been eliminated.

Great Plains Energy's sole reportable business segment is the electric utility segment (Electric Utility). See Note 22 for additional information.

Use of Estimates

The process of preparing financial statements in conformity with Generally Accepted Accounting Principles (GAAP) requires the use of estimates and assumptions that affect the reported amounts of certain types of assets, liabilities, revenues and expenses. Such estimates primarily relate to unsettled transactions and events as of the date of the financial statements. Accordingly, upon settlement, actual results may differ from estimated amounts.

Cash and Cash Equivalents

Cash equivalents consist of highly liquid investments with original maturities of three months or less at acquisition.

Time Deposit

Consists of a non-negotiable fixed rate investment in a time deposit with an original maturity of greater than three months and is recorded on the balance sheet at cost. The Company estimates the fair value of the time deposit, which approximates its carrying value, using Level 2 inputs based on current interest rates for similar investments with comparable credit risk and time to maturity.

Fair Value of Financial Instruments

The following methods and assumptions were used to estimate the fair value of each class of financial instrument for which it is practicable to estimate that value.

Nuclear decommissioning trust fund - KCP&L's nuclear decommissioning trust fund assets are recorded at fair value based on quoted market prices of the investments held by the fund and/or valuation models.

Pension plans - For financial reporting purposes, the market value of plan assets is the fair value. For regulatory reporting purposes, a five-year smoothing of assets is used to determine fair value.

Derivative Instruments

The Company records derivative instruments on the balance sheet at fair value in accordance with GAAP. Great Plains Energy and KCP&L enter into derivative contracts to manage exposure to commodity price and interest rate fluctuations. Derivative instruments are entered into solely for hedging purposes and are not issued or held for speculative reasons.

The Company considers various qualitative factors, such as contract and market place attributes, in designating derivative instruments at inception. Great Plains Energy and KCP&L may elect the normal purchases and normal sales (NPNS) exception, which requires the effects of the derivative to be recorded when the underlying contract settles. Great Plains Energy and KCP&L account for derivative instruments that are not designated as NPNS as non-hedging derivatives, which are recorded as assets or liabilities on the consolidated balance sheets at fair value.

Great Plains Energy and KCP&L offset fair value amounts recognized for derivative instruments under master netting arrangements, which include rights to reclaim cash collateral (a receivable), or the obligation to return cash collateral (a payable).

Utility Plant

Great Plains Energy's and KCP&L's utility plant is stated at historical cost. These costs include taxes, an allowance for the cost of borrowed and equity funds used to finance construction and payroll-related costs, including pensions and other fringe benefits. Replacements, improvements and additions to units of property are capitalized. Repairs of property and replacements of items not considered to be units of property are expensed as incurred (except as discussed under Deferred Refueling Outage Costs). When property units are retired or otherwise disposed, the original cost, net of salvage, is charged to accumulated depreciation. Substantially all of KCP&L's utility plant is pledged as collateral for KCP&L's mortgage bonds under the General Mortgage Indenture and Deed of Trust dated December 1, 1986, as supplemented (Indenture). A portion of GMO's utility plant is pledged as collateral for GMO's mortgage bonds under the General Mortgage Indenture and Deed of Trust dated April 1, 1946, as supplemented.

As prescribed by The Federal Energy Regulatory Commission (FERC), Allowance for Funds Used During Construction (AFUDC) is charged to the cost of the plant during construction. AFUDC equity funds are included as a non-cash item in non-operating income and AFUDC borrowed funds are a reduction of interest charges. The rates used to compute gross AFUDC are compounded semi-annually. The rates used to compute gross AFUDC for KCP&L averaged 4.9% in 2017, 5.7% in 2016 and 3.0% in 2015. The rates used to compute gross AFUDC for GMO averaged 1.9% in 2017, 1.6% in 2016 and 4.2% in 2015.

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Table of Contents

Great Plains Energy's and KCP&L's balances of utility plant, at original cost, with a range of estimated useful lives are listed in the following tables.

Great Plains Energy

December 31		2017		2016
Utility plant, at original cost		(mil	lions)	
Generation (20 - 60 years)	S	7,930.8	s	8,106.4
Transmission (15 - 70 years)		912.3		886.3
Distribution (8 - 66 years)		3,789.0		3,629.1
General (5 - 50 years)		1,042.0		975.9
Total (a)	S	13,674.1	S	13,597.7

(a) Includes \$265.0 million and \$261.2 million at December 31, 2017 and 2016, respectively, of land and other assets that are not depreciated.

KCP&L

December 31	2017		2016
Utility plant, at original cost	(n	uillions)	
Generation (20 - 60 years)	\$ 6,471.5	s	6,350.7
Transmission (15 - 70 years)	500.4		484.1
Distribution (8 - 55 years)	2,389.4		2,298.4
General (5 - 50 years)	851.9		791.9
Total (a)	\$ 10,213.2	\$	9,925.1

(a) Includes \$176.0 million and \$178.0 million at December 31, 2017 and 2016, respectively, of land and other assets that are not depreciated.

Plant to be Retired, Net

When Great Plains Energy and KCP&L retire utility plant, the original cost, net of salvage, is charged to accumulated depreciation. However, when it becomes probable an asset will be retired significantly in advance of its original expected useful life and in the near term, the cost of the asset and related accumulated depreciation is recognized as a separate asset as a probable abandonment. If the asset is still in service, the net amount is classified as plant to be retired, net on the consolidated balance sheets. If the asset is no longer in service, the net amount is classified in regulatory assets on the consolidated balance sheets.

Great Plains Energy and KCP&L must also assess the probability of full recovery of the remaining net book value of the abandonment. The net book value that may be retained as an asset on the balance sheet for the abandonment is dependent upon amounts that may be recovered through regulated rates, including any return. An impairment charge, if any, would equal the difference between the remaining net book value of the asset and the present value of the future revenues expected from the asset.

In June 2017, Great Plains Energy and KCP&L announced the expected retirement of certain older generating units, including GMO's Sibley No. 3 Unit, over the next several years. As of December 31, 2017, Great Plains Energy has determined that Sibley No. 3 Unit meets the criteria to be considered probable of abandonment and has classified its remaining net book value of \$143.6 million within plant to be retired, net on its consolidated balance sheet. The Company is currently allowed a full recovery of and a full return on Sibley No. 3 Unit in rates and has concluded that no impairment is required as of December 31, 2017.

Depreciation and Amortization

Depreciation and amortization of utility plant other than nuclear fuel is computed using the straight-line method over the estimated lives of depreciable property based on rates approved by state regulatory authorities. Annual depreciation rates average approximately 3%. Nuclear fuel is amortized to fuel expense based on the quantity of heat produced during the generation of electricity.

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 2nd day of January 2019.



000

Morris L. Woodruff Secretary

MISSOURI PUBLIC SERVICE COMMISSION

January 2, 2019

File/Case No. EC-2019-0200

Missouri Public Service Commission Staff Counsel Department 200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, MO 65102 staffcounselservice@psc.mo.gov

Office of the Public Counsel Marc Poston 200 Madison Street, Suite 650 P.O. Box 2230 Jefferson City, MO 65102 opcservice@ded.mo.gov KCP&L Greater Missouri Operations Company Legal Department One Kansas City Place, 1200 Main Street P.O. Box 418679 Kansas City, MO 64105

Midwest Energy Consumers Group

David Woodsmall 308 E. High Street, Suite 204 Jefferson City, MO 65101 david.woodsmall@woodsmalllaw.com

Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,

orris I Woodruff

Morris L. Woodruff Secretary

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.