

DATA REQUEST– Set TRIG_20060804
Case: ER-2006-0314
Date of Response: 08/22/2006
Information Provided By: Dave Henriksen
Requested by: Herz Joseph

Question No. : 28

Reference the programs contained in the Company's "regulatory plan" in Case No. EO-2005-0329 and the direct testimony of Susan K. Nathan in this case, Case No. ER-2006-0314. Recognizing that elimination of electrical load through the use of alternative energy sources is different from curtailment per se, outright avoidance of low load factor, high demand electrical usage nonetheless accomplishes the desired curtailment and is in fact preferable to costly and inconvenient efforts to perform spot curtailment. Consistent with this, the testimony and exhibits are replete with references to the need to reduce demand loading on the KCPL system. According to Ms. Nathan's testimony "it became apparent that KCP&L was not concerned about how the customer curtailed, as long as they did curtail" (Schedule SKN-1 to her testimony in ER-2006-0314; emphasis ours). It therefore follows that all reasonable means to pursue peak load demand reduction should be pursued. In light of the above, the Company's recognition of the need to reduce demand load, and the ratepayer-funded initiatives to reduce system peak loading, answer the following: a) Confirm that electrical system peak load avoidance, such as can be realized by displacement to alternative energy sources, is at least as desirable as curtailment of load, if not better as a policy goal. If such cannot be confirmed, please state why not. b) Further, confirm that occasions of highest system electrical demand loading coincide with the most intensive use of commercial chilling equipment and associated HVAC equipment. If such cannot be confirmed, please state why not. c) Confirm also that KCPL stands behind Ms. Nathan's own testimony regarding the demand response initiatives and the need to curtail HVAC loading, particularly the statement that "...it became apparent that KCP&L was not concerned about how the customer curtailed, as long as they did curtail" (Schedule SKN-1 to her testimony in ER-2006-0314; emphasis ours), and that migration of low-load factor, high demand load such as that presented by Bartle to the steam-driven alternative would be consistent with Ms. Nathan's testimony and the ratepayer-supported efforts to reduce peak system loading. If such cannot be confirmed, please state why not. d) Reconcile the contemporaneous marketing efforts by Great Plains Energy/Kansas City Power & Light employees to convince the City of Kansas City Missouri/Bartle Hall Convention Center to forgo/discontinue receiving heating steam and steam-driven chilled water service from Trigen and Trigen's chilled water service affiliate. e) State the number of megawatts by which such a decision by Bartle Hall, encouraged by KCPL, would increase KCPL's peak system demand load. Explain how the marketing group's ratepayer-funded efforts to effectively increase peak summertime loading on the system can coexist simultaneously with Ms. Nathan's ratepayer-funded efforts to reduce peak system loading. f) Explain how the Company's customer base is served by these actions. g) Explain the public policy interest served by the Company in this regard. h) Provide all communications, external

and internal, related to KCPL's pursuit of the chilled water business at Bartle Hall. Include all notes, emails, internal studies and evaluations.

Response:

a), c), d), e), f), g) and h) were formally objected in a separate letter.

b) KCPL's summer peak is primarily driven by extreme summer temperatures and associated weather conditions. The root cause of the summer peak (relative to other seasonal peaks) is the large amount of customer cooling load imposed on the system. However, KCPL does not have specific end-use load data available that would permit the unequivocal statement that the "[occasions of highest system electrical demand loading coincide with the most intensive use of commercial chilling equipment and associated HVAC equipment](#)". Load diversity between commercial, industrial and residential load also plays a determining factor as to when during a particular day the KCPL system will experience a peak.

Attachments: None