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PLEASE REPLY TO MISSOURI OFFICE  
March 13, 1987

\* ADMITTED IN KANSAS ONLY  
\*\* ADMITTED IN KANSAS AND MISSOURI  
ALL OTHERS ADMITTED IN MISSOURI

Mr. Harvey G. Hubbs  
Secretary  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Re: Case No. HO-86-139 In the matter of the  
investigation of steam service rendered  
by Kansas City Power & Light Company

RECEIVED

MAR 16 1987

MO. PUBLIC SERVICE COMMISSION

Dear Mr. Hubbs:

Enclosed for filing in the above-captioned case is an original and fourteen copies of the Answers of Intervenor Boatmen's Bank of Kansas City, et al. to Staff's First Set of Interrogatories. Additionally, we have enclosed a copy that we would request that you file-stamp and return to us in the enclosed self-addressed and stamped envelope.

Copies of this pleading have been sent to all parties of record.

We appreciate your cooperation.

Yours truly,

DIETRICH, DAVIS, DICUS, ROWLANDS,  
SCHMITT & GORMAN

By *Darry Gene Sands*  
Darry Gene Sands

DGS/bks  
cc/All parties of record  
Intervenors

FILED  
MAR 16 1987  
PUBLIC SERVICE COMMISSION

PS. 7 copies are being sent w/ this letter;  
8 copies will be sent under  
separate cover.

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the matter of the investigation )  
of steam service rendered by Kansas) Case No. HO-86-139  
City Power & Light Company. )

ANSWERS OF INTERVENORS BOATMEN'S BANK OF  
KANSAS CITY, ET AL. TO STAFF'S FIRST SET OF INTERROGATORIES

Intervenors Boatmen's First National Bank of Kansas City, et al., by and through their attorneys of record, make the following sworn answers to Staff's First Set of Interrogatories to Intervenors Boatmen's First National Bank of Kansas City, et al.

1. On page 3, line 6 of the Direct Testimony of Intervenor Albert P. Mauro filed in the above-referenced docket on February 23, 1987, it is stated that "our support for the proposed conversion plan does not extend to the proposed rate increases." Does this mean that the Intervenors oppose the proposed rate increase of Kansas City Power & Light Company (KCPL) in this case?

ANSWER:

Implicit in the testimony of Albert P. Mauro is that Intervenors are opposed to the proposed rate increases.

2. On page 3 of Mr. Mauro's testimony the following question and answer appear:

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MAR 16 1987

PUBLIC SERVICE COMMISSION

Q. How much did the Intervenor pay during calendar year 1985 to KCPL for steam heat?

A. \$255,859.

What is the source of this figure?

ANSWER:

This information was supplied to Intervenor by Kansas City Power & Light.

3. Does the \$255,859 cited in interrogatory 2 include taxes of is it for steam only?

ANSWER:

To the extent that this question is relevant, the figure includes gross receipts taxes which were billed to and paid by Intervenor.

4. On pages 4 and 5 of Mr. Mauro's testimony he explains his understanding of KCPL's proposed steam conversion plan. Does Mr. Mauro understand that KCPL intends to obtain the unrecovered investment in the on-site electric boilers through steam rates to be charged between 1990 and 1995?

ANSWER:

Although Intervenor regard this question as objectionable as being argumentative, Mr. Mauro does understand that KCPL intends to obtain the unrecovered investment in the on-site electric boilers through steam rates to be charged between 1990 and 1995.

5. Has Kansas City Southern Industries (KCSI) received any estimate of the capital costs of installing a gas boiler as an alternate heating source?

ANSWER:

No.

6. On page 8 of Mr. Mauro's testimony he states that the potential for future rate increases and questions about future availability of supply were his primary concerns regarding gas as an alternative heating source. Are these the only concerns Mr. Mauro has about gas as an alternative heating source?

ANSWER:

Mr. Mauro's testimony accurately reflects that the concerns mentioned are primary concerns.

7. On page 4 of Mr. Mauro's testimony he states that the bulk of information he has received on KCPL's conversion plan has come from KCPL. Please provide Staff a copy of all the information the Intervenors have received from KCPL regarding this issue. Further, please provide all correspondence that Intervenors have sent to KCPL regarding this issue. To the extent that this information concerns the energy audits conducted by Energy Masters Corporation or the testimony submitted by KCPL in this case, it is only necessary that the information submitted include any cover letters submitted by KCPL in transmitting material to the Intervenors

and/or any correspondence the Intervenor submitted to KCPL concerning the energy audits or KCPL testimony.

ANSWER:

This interrogatory is objectionable in that while it purports to be an interrogatory it actually is a request for production of documents which has not been properly propounded upon the intervenors. Nevertheless, Intervenor will respond. First of all, the bulk of the information available to Intervenor is the same information before the Staff, i.e., the testimony of KCPL and exhibits appended thereto. In reviewing his file, counsel for the intervenors could find no correspondence either to or from KCPL relating either to the testimony of KCPL or to the Energy Masters Corporation energy audits other than correspondence directed to the Staff or Commission and copied to all parties of record. Intervenor shall not provide staff a separate copy of these materials in that Staff may consult its own files for such correspondence. Other information received by Intervenor is attached to these Answers.

8. To what extent have the Intervenor been in communication with representatives of KCPL regarding the Intervenor's testimony in this proceeding?

ANSWER:

Neither Intervenor nor their counsel have discussed Intervenor's testimony with KCPL.

9. Have the Intervenor's ever discussed their involvement in this case with representatives of KCPL?

ANSWER:

Although this interrogatory is worded so vaguely as to be objectionable, Intervenor's will attempt to respond to the best of their ability. Intervenor's and/or their counsel of record have been in contact with KCPL relative to their intention to intervene. Since intervening, counsel for Intervenor's has been in contact with KCPL relative to: information pertaining to utility rates; amounts paid by intervenors for steam; square footage of Intervenor's properties; the desirability of local public hearings on the conversion issue; responding to KCPL's request for position as to the seven issue areas discussed at the continuation of the prehearing conference held on October 10, 1986, communications relative to counsel's review of KCPL testimony and other miscellaneous conversations relative to the proceedings before the Public Service Commission.

10. If the answer to interrogatory 10 is yes, please explain the nature of the contact.

ANSWER:

See response to No. 9.

11. Have the Intervenor's had any contact with KCPL concerning the public hearing scheduled for this proceeding?

ANSWER:

See response to No. 9.

12. If the answer to interrogatory 11 is yes, please explain the nature of the contact.

ANSWER:

See response to No. 9.

The information contained in the above answers was provided by Albert P. Mauro, Vice President and Secretary, Kansas City Southern Industries, Inc., as representative of Intervenor's Boatmen's First National Bank of Kansas City, et al.

Intervenor's Boatmen's First National  
Bank of Kansas City, et al.

By: Albert P. Mauro  
Albert P. Mauro  
Vice President/Secretary  
Kansas City Southern Industries,  
Inc.

Subscribed and sworn before me this 13<sup>th</sup> day of  
March, 1987.

Barbara Schultz  
BARBARA SCHULTZ Notary Public  
Notary Public - State of Missouri  
Commissioned in Jackson County  
My commission expires: My Commission Expires 10-1-89

DIETRICH, DAVIS, DICUS, ROWLANDS,  
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Attorneys for Intervenor's  
Boatmen's First National  
Bank of Kansas City, et al.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he mailed copies of the foregoing to the following parties by first-class mail, postage prepaid this 13<sup>th</sup> day of March, 1987: Mark G. English, Kansas City Power & Light Company, 1330 Baltimore Avenue, Kansas City, Missouri 64105, Mary Ann Young and Douglas C. Walther, Public Service Commission, P.O. Box 360, Jefferson City, Missouri 65102, David Claycomb, 2460 Pershing Road, Kansas City, Missouri 64108, John K. Rosenberg, Kansas Power and Light Company, 818 Kansas Avenue, Topeka, Kansas 66601, Martin J. Bregman, 818 Kansas Avenue, Topeka, Kansas 66601, William Clark Kelly, Assistant Attorney General, P.O. Box 899, Jefferson City, Missouri 65102, David L. Schwaller, P.O. Box 809, Jefferson City, Missouri 65102, Carrol C. Kennett, Assistant City Attorney, 2800 City Hall, 414 East 12th Street, Kansas City, Missouri 64106, Jeremiah D. Finnegan, 4225 Baltimore, Kansas City, Missouri 64111, John B. Williams, County Counselor, Jackson County Courthouse, 415 East 12th Street, Kansas City, Missouri 64106, Office of Public Counsel, P.O. Box 7800, Jefferson City, Missouri 65102.

  
Darry Gene Sands

Attorney for Intervenors  
Boatmen's First National  
Bank of Kansas City, et al.