**FILED** June 26, 2015

Exhibit No.: 111 NP

Issue: Fuel Adjustment Clause Missouri Public

Data Center

Witness: Burton L. Crawford Service Commission

Type of Exhibit: Surrebuttal Testimony

Sponsoring Party: Kansas City Power & Light Company

Case No.: ER-2014-0370

Date Testimony Prepared: June 5, 2015

#### MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2014-0370

## SURREBUTTAL TESTIMONY

**OF** 

#### **BURTON L. CRAWFORD**

#### ON BEHALF OF

## KANSAS CITY POWER & LIGHT COMPANY

Kansas City, Missouri June 2015

\*\*" Designates "Highly Confidential" Information Has Been Removed.

KC15L Exhibit No. 111 NP
Date 6-15-15 Reporter AT
File No. ER-2014-0370

## SURREBUTTAL TESTIMONY

## OF

## **BURTON L. CRAWFORD**

## Case No. ER-2014-0370

1	Q:	Please state your name and business address.	
2	A:	My name is Burton L. Crawford. My business address is 1200 Main Street, Kansas City,	
3		Missouri 64105.	
4	Q:	Are you the same Burton L. Crawford who pre-filed Direct and Rebuttal Testimony	
5		in this matter?	
6	A:	Yes, I am.	
7	Q:	What is the purpose of your Surrebuttal Testimony?	
8	A:	The purpose of my testimony is to respond to issues raised by the Missouri Industrial	
9		Energy Consumers and the Office of Public Counsel witness James Dauphinais in his	
10		Rebuttal Testimony concerning Kansas City Power & Light Company's ("KCP&L" or	
11		the "Company") volume of purchased power.	
12	Q:	Mr. Dauphinais concludes that KCP&L's normalized annual level of purchased	
13		power obtained under purchased power agreements and from the Southwest Power	
14		Pool, Inc. ("SPP") is approximately ** MWh (Dauphinais Rebuttal,	
15		p.12, Il. 1-4). Do you agree?	
16	A:	No.	
17	Q:	How did Mr. Dauphinais reach this conclusion?	
18	A:	Mr. Dauphinais based this conclusion on the Company's fuel modeling results presented	
19		in Schedule BLC-4 of my Direct Testimony in this case.	

1	Q:	Is this a correct interpretation of the modeling results presented in Schedule BLC-		
2		4?		
3	A:	No.		
4	Q:	What do the modeling results in Schedule BLC-4 represent?		
5	A:	Most of the energy amounts presented in Schedule BLC-4, including the **		
6		MWh of purchased power show the results of KCP&L's normalized fuel model run in		
7		this case. KCP&L's production cost model (Midas) simulates the operation of the		
8		Company's generating fleet under the assumption that KCP&L's lowest cost resources		
9		first go to serve KCP&L's load obligations. If energy can be purchased from the		
0		wholesale market at a lower cost, it does so. The modeling results were used to		
1		determine the appropriate level of fuel costs to include in the Company's cost of service		
2		and not the volume or cost of purchased power.		
3	Q:	Why were the Midas production cost model purchased power results not used in the		
4		Company's cost of service for purchased power?		
5	A:	As more fully explained by Company witnesses Ryan Bresette and John Carlson, under		
6		the SPP Integrated Marketplace that started in March 2014, KCP&L now purchases all		
7		native load energy requirements through SPP.		
8	Q:	What is the Company's normalized level of purchased power included in this case?		
9	A:	In addition to purchased power costs obtained under KCP&L's purchased power		
20		agreements, KCP&L included the cost of approximately ** ** MWh of		
?1		purchased power in its cost of service. This represents the normalized volume of		
22		purchases made through the SPP Integrated Marketplace for KCP&L's native load and		

firm wholesale obligations. KCP&L priced out this load at the normalized hourly SPP

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- 1 energy market prices to arrive at the cost of purchased power for KCP&L's native load
- 2 and firm wholesale obligations included in its cost of service.
- 3 Q: Does that conclude your Surrebuttal Testimony?
- 4 A: Yes, it does.

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light Company's Request for Authority to Implement A General Rate Increase for Electric Service	) Case No. ER-2014-0370
AFFIDAVIT OF BURT	ON L. CRAWFORD
STATE OF MISSOURI	
COUNTY OF JACKSON )	
Burton L. Crawford, being first duly sworn	on his oath, states:
1. My name is Burton L. Crawford.	I work in Kansas City, Missouri, and I am
employed by Kansas City Power & Light Compan	y as Director, Energy Resource Management.
2. Attached hereto and made a par-	t hereof for all purposes is my Surrebuttal
Testimony on behalf of Kansas City Power & Ligh	nt Company consisting of three
(3) pages, having been prepared in written for	rm for introduction into evidence in the above-
captioned docket.	
3. I have knowledge of the matters se	t forth therein. I hereby swear and affirm that
my answers contained in the attached testimony t	o the questions therein propounded, including
any attachments thereto, are true and accurate to	the best of my knowledge, information and
Burto	J C Crawford
Subscribed and sworn before me this	_ day of June, 2015.
\\\\\\\	Micol A. Co
Notar My commission expires:F_Ub. 4 2010	y Public  NICOLE A. WEHRY / Notary Public - Notary Seal State of Missouri Commissioned for Jackson County My Commission Expires: February 04, 2019 Commission Number: 14391200