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Witness: Jeffrey M. Wolf
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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2012-0174

REBUTTAL TESTIMONY

OF

JEFFREY M. WOLF

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

**Kansas City, Missouri
September 2012**

KCP&L Exhibit No. 52
Date 10-29-12 Reporter KF
File No. ER-2012-0174

REBUTTAL TESTIMONY

OF

JEFFREY M. WOLF

Case No. ER-2012-0174

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

2 A: My name is Jeffrey M. Wolf. My business address is 4400 E. Front St, Kansas City,
3 Missouri, 64120.

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

5 A: I am employed by Kansas City Power & Light Company (“KCP&L” or the “Company”)
6 as Senior Director, Engineering & Planning.

7 **Q: What are your responsibilities?**

8 A: I am responsible for the following Engineering and Operations functions: Transmission
9 and Distribution Planning; Asset Management Engineering; Standards Engineering;
10 Transmission, Substation, and System Protection Engineering; Smart Grid and
11 Distribution Automation; and Transmission System Operations.

12 **Q: Please describe your education, experience and employment history.**

13 A: I hold a Bachelor of Science degree in Electrical Engineering from Kansas State
14 University and a Masters of Business Administration (Finance) degree from Rockhurst
15 University in Kansas City. I have over 25 years experience with KCP&L in a variety of
16 engineering and management roles, including distribution and standards engineering,
17 distribution dispatching operations, strategic planning, support operations, and
18 transmission/substation construction & maintenance.

1 **Q: Have you previously testified in a proceeding at the Missouri Public Service**
2 **Commission (“MPSC” or “Commission”) or before any other utility regulatory**
3 **agency?**

4 A: No.

5 **Q: Are you familiar with the Direct Testimony of William P. Herdegen, III submitted**
6 **in this case?**

7 A: Yes, I am. Mr. Herdegen is leaving the company on September 7, 2012. I am adopting
8 his Direct Testimony.

9 **Q: What is the purpose of your Rebuttal Testimony?**

10 A: My testimony addresses a number of issues presented in the Direct Testimony of
11 witnesses for the City of Kansas City, Missouri (the “City”). I will address the following:

- 12 1) the Direct Testimony of Michael Roper, Airport Manager for the Charles B.
13 Wheeler Downtown Airport (“Downtown Airport”); and
- 14 2) the Direct Testimony of Michael H. Klender, Plant Manager of the Water
15 Services Department for the City.

16 **Downtown Airport**

17 **Q: Please respond to Mr. Roper’s testimony on the impulsive transient power events**
18 **that were experienced at the Downtown Airport.**

19 A: We acknowledge that an outage occurred on May 20, 2012. This outage was caused by
20 an attempted theft of copper on our primary circuit that supplies power to the Downtown
21 Airport. The other power events are being investigated by KCP&L and Downtown
22 Airport Staff to determine the causes of these events.

1 **Q: How is KCP&L addressing the impulsive transient power events described by Mr.**
2 **Roper?**

3 A: KCP&L has initiated the following processes concerning the power quality for the
4 Downtown Airport:

- 5 • KCP&L is patrolling both primary circuits that provide service to the Downtown
6 Airport. This patrol will look at equipment and any vegetation issues. Issues
7 identified during the patrol will be evaluated and addressed.
- 8 • KCP&L has met with Downtown Airport Staff and will work with Downtown
9 Airport Staff to determine the cause(s) of these events. Downtown Airport Staff
10 will log each event time and equipment affected by the event. KCP&L has
11 installed monitoring equipment on five different areas on its system. As future
12 events occur, KCP&L and Downtown Airport Staff will review data to help
13 identify the problems that may be causing the events.

14 When a cause of these interruptions is identified, KCP&L and Downtown Airport Staff
15 will work together to determine appropriate action plans to address such cause.
16 Consideration of future expansions on airport property will also be part of this
17 investigation.

18 **Q: Should the Commission “investigate and determine whether the power fluctuations**
19 **Downtown Airport is experiencing are localized to the airport or perhaps are**
20 **regional and include the North Kansas City industrial area near the Airport,” as**
21 **Mr. Roper suggests?**

22 A: No, KCP&L is working with the Downtown Airport to try to determine the cause(s) of
23 these events. Part of this investigation is determining the possible cause(s) of events.

1 These events could include storm outages, human interferences, and other issues not
2 controlled by KCP&L, including causes that are a result of customer equipment.

3 **Q: Is KCP&L working to “determine the unquestionable cause of the fluctuations,” as**
4 **Mr. Roper suggests it should?**

5 A: Yes. KCP&L is working to determine possible cause of fluctuations. However, because
6 factors such as storms, hit poles and varmints could contribute to these fluctuations, the
7 determination of an “unquestionable cause” may not be possible.

8 **Q: Should the Commission “direct KCP&L to commence very soon a program to**
9 **upgrade the power distribution facilities serving Downtown Airport,” as Mr. Roper**
10 **suggests?**

11 A: No. Because the Commission has already mandated numerous programs that require
12 KCP&L to monitor system performance and address underperforming systems, including
13 the Infrastructure Inspection, Maintenance Program and the Worst Performing Circuits
14 Program, such direction from the Commission is not necessary. In addition, KCP&L has
15 demonstrated its willingness to address system reliability concerns by engaging the
16 Downtown Airport in dialogue about the service to these facilities. Any additional
17 mandates by the Commission requiring KCP&L to rebuild facilities that may not be
18 responsible for service concerns at the Downtown Airport could be redundant at best and
19 at worst could force KCP&L (and by extension, its ratepayers) to incur unnecessary
20 additional cost.

1 Kansas City, Missouri Water Services Facilities

2 **Q: How has KCP&L responded to Mr. Klender's recommendations for improving**
3 **KCP&L service quality to water services facilities?**

4 **A:** KCP&L has met with the City Water Department on multiple occasions to review and
5 address outage concerns. KCP&L, along with City Water Department support, has
6 implemented the following:

- 7 • KCP&L has completed site visits for each facility in question to evaluate and
8 assess both KCP&L and City electrical facilities;
- 9 • Event recorders have been placed at specific equipment locations to monitor
10 voltage activity in and out of identified facilities;
- 11 • The City and KCP&L will work together to analyze the information from the
12 recorders to determine if there are discrepancies or incompatibilities within the
13 systems;
- 14 • The Water Services Department and KCP&L are analyzing historical data;
- 15 • The Water Services Department and KCP&L are logging event information;
- 16 • KCP&L will evaluate its distribution system network providing electric service to
17 each of the affected facilities; and
- 18 • KCP&L will look into opportunities to improve reliability in the southeast area.
19 However, KCP&L will need feedback from the City on a timeframe within which
20 to make such improvements.

21 Based on information gathered by this process, KCP&L and the City will determine
22 action plans to address possible solutions.

1 **Q: Do you have any recommendations on improving KCP&L's quality of service to the**
2 **Water Services Department?**

3 A: Yes. As addressed in the previous answer, KCP&L, along with the City, is gathering
4 data to identify quality of service issues and determine recommendations for both
5 KCP&L and the City. An independent company Power Protection Products Inc., ("P3")
6 was hired by KCP&L to provide recommendations based on data collected from the
7 various sites. This recommendation will be for KCP&L and the City. P3 is a company
8 that specializes in power quality investigations.

9 **Q: Do you agree with Mr. Klender's recommendation at page 6 lines 11-18 that**
10 **KCP&L should make such improvements while the P3 study is underway?**

11 A: No. Currently data is being collected and analyzed by P3, KCP&L and the City. Based
12 on this information KCP&L will address specific voltage issues encountered during the
13 monitoring stage. The City will address any issues that have occurred on their
14 equipment, and P3 will continue gathering data. After 30 days, P3 will summarize the
15 data and present a recommendation based on its findings.

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

17 A: Yes, it does.

