

The Empire District Electric Company
Response to Office of Public Counsel's Data Request 8535.1 and 8548
Case No. EO-2018-0092

Response provided by: Blake A. Mertens
James McMahon

Title: Vice President, Electric Operations
Vice President, Energy Practice

Company Response Number: 8535.1

Date of Response: April 9, 2018

Question:

In response to OPC data request No. 8535 Mr. Mertens states, "The modeling allowed for the optimization of retirement of all existing Empire units." Which of the following units are not within Mr. Mertens' definition of "all existing Empire units"?:

Riverton 10, Riverton 11, Riverton 12CC
StateLine CT, StateLine CC.
Asbury 1
Iatan 1, Iatan 2
Plum Point
Energy Center 1, Energy Center 2, Energy Center 3, Energy Center 4
Ozark Beach 1, Ozark Beach 2, Ozark Beach 3, Ozark Beach 4

Response:

ABB's Capacity Expansion Model employed by Empire in the modeling of the GFSA allowed the retirement of Asbury whenever the model deemed that it was economic. The only plans that retained Asbury were the plans that the model was forced to keep it online (Plans 1 and 4).

Empire did not allow the model to retire Plum Point, Iatan, or Iatan 2, as Empire is not the sole owner of those plants. Empire did not allow Riverton 10, 11 or the Stateline CT to retire as those are used for blackstart and other ancillary services. Empire's two combined cycle units (Riverton and Stateline) were not allowed to retire early in order to simplify the modeling; the age and performance of these units do not make them likely candidates for early economic retirement.

Responsible person(s): Blake A. Mertens, James McMahon

OPC Exhibit No. 215
Date 5/16/18 Reporter MM
File No. EO-2018-0092

The Empire District Electric Company
Response to Office of Public Counsel's Data Requests 8515-8535
Case No. EO-2018-0092

Response provided by: Blake A. Mertens
Title: Vice President, Electric Operations
Company Response Number: 8535
Date of Response: January 5, 2018

Question:

Did Empire analyze retiring higher cost, older CT units instead of Asbury? If not, explain in detail why not.

Response:

The modeling allowed for the optimization of retirement of all existing Empire units.

Responsible person(s): Blake A. Mertens