

Exhibit No.: 118 (NP)
Issue: Plant Heat Rates and the FAC
Witness: Burton L. Crawford
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Kansas City Power & Light Company
Case No.: ER-2016-0285
Date Testimony Prepared: January 27, 2017

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Missouri Public
Service Commission

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2016-0285

SURREBUTTAL TESTIMONY

OF

BURTON L. CRAWFORD

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

Kansas City, Missouri
January 2017

KCP&L Exhibit No. 118 NP
Date 2-8-17 Reporter LB
File No. ER-2016-0285

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SURREBUTTAL TESTIMONY

OF

BURTON L. CRAWFORD

Case No. ER-2016-0285

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

2 A: My name is Burton L. Crawford. My business address is 1200 Main, Kansas City,
3 Missouri 64105.

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 “Company”) as
6 Director, Energy Resource Management.

7 **Q: On whose behalf are you testifying?**

8 A: I am testifying on behalf of KCP&L.

9 **Q: Are you the same Burton L. Crawford who filed Direct and Rebuttal Testimony in**
10 **this proceeding?**

11 A: Yes, I am.

12 **Q: What is the purpose of your Surrebuttal testimony?**

13 A: I will briefly address the plant heat rate issue raised by Office of the Public Counsel
14 (“OPC”) witness John A. Robinett in his rebuttal testimony.¹

¹ This issue is also noted without substantive discussion in the rebuttal testimony of OPC witnesses Lena Mantle at page 14 and Charles Hyneman at page 47.

1 **Q: Beginning at page 12 of his rebuttal testimony, Mr. Robinett expresses concerns**
2 **with the plant heat rate data filed with the Company's direct testimony, stating that**
3 **it was not all based on testing completed within the 24 month period prior to that**
4 **filing. Please respond to this concern.**

5 A: As part of its direct testimony and its responses to data requests in this case, the Company
6 has provided heat rate test results that are all within 24 months of the date of the filing of
7 the direct case. Schedule BLC-8 (HC) to my direct testimony contains a summary of the
8 results for each of the KCP&L fossil fuel generators. These same results can also be
9 found in either the Direct case filing or KCP&L's responses to Staff Data Requests No.
10 0189 and No. 0309. These results can be used as a baseline against which future heat rate
11 test results can be compared.

12 **Q: Is the provision of heat rate test results that occurred within 24 months of the filing**
13 **acceptable for developing baselines for KCP&L?**

14 A: Yes, this information provides more current data than providing heat rate information
15 from tests that occurred 24 months prior to the direct case filing.

16 **Q: Mr. Robinett recommends on page 17 of his rebuttal testimony that the parties work**
17 **together to develop heat rate baselines to be used for KCP&L. What is your**
18 **response?**

19 A: While the data provided in this case is adequate to provide such a baseline, the Company
20 is certainly willing to discuss alternatives.

1 **Q: Mr. Robinett also recommends on page 17 of his rebuttal that the Commission**
2 **order KCP&L to provide heat rate testing reports for each of its generating**
3 **facilities that include heat rate curves and the data used to derive the curves as part**
4 **of its next general rate case. What is your response?**

5 A: While the Company believes that the submission of heat rate curves is not required by
6 rule, the Company is willing to provide heat rate curves for its base load units consistent
7 with what it has provided in response to Staff Data Request No. 0189 in this case.

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

9 A: Yes, it does.

SCHEDULE BLC-8

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