

Exhibit No.:

Issues: Steam Service  
Reliability

Witness: Glenn P. Keefe

Sponsoring Party: Aquila Networks-L&P

Case No.: HR-2005-0450

**FILED<sup>2</sup>**

FEB 24 2006

Before the Public Service Commission  
of the State of Missouri

Missouri Public  
Service Commission

Surrebuttal Testimony

of

Glenn P. Keefe

Exhibit No. 1016  
Case No(s) HR-2005-0450  
Date 1-09-06 Rptr KE

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI  
SURREBUTTAL TESTIMONY OF GLENN P. KEEFE  
ON BEHALF OF AQUILA, INC.  
D/B/A AQUILA NETWORKS-L&P  
CASE NO. HR-2005-0450**

1 Q. Please state your name and business address.

2 A. My name is Glenn P. Keefe. My business address is 10750 East 350 Highway, Kansas City,  
3 Missouri.

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

5 A. I am employed by Aquila, Inc. as Operating Vice-President, Missouri Electric (Networks-  
6 MPS and Networks-L&P).

7 Q. Are you the same Glenn P. Keefe who submitted rebuttal testimony in this case?

8 A. Yes, I am.

9 **EXECUTIVE SUMMARY**

10 Q. What is the purpose of your surrebuttal testimony?

11 A. The purpose of this surrebuttal testimony is to respond to prepared comments of Terry  
12 McClatchey, representing AG Processing (AGP) at the public hearing held in St. Joseph,  
13 Missouri on November 17, 2005.

14 Q. What issue did Mr. McClatchey bring to the Commission's attention to which you wish  
15 to respond?

16 A. Mr. McClatchey expressed concern about service reliability, stating in particular that  
17 "AGP normally experiences up to nineteen electrical and steam outages per year." I will  
18 provide statistics that will reflect good service reliability provided by Aquila, Inc. for

1 steam service.

2 **STEAM SERVICE RELIABILITY**

3 Q. Mr. McClatchey included steam outages together with electrical outages for his  
4 insinuation of poor reliability. What about steam outages?

5 A. Aquila believes the steam service provided is highly reliable. We supply steam customers  
6 with steam for the entire year. There are more steam outages than electrical outages but  
7 mostly due to what is defined as an outage. Aquila's Lake Road Plant supplies AGP with  
8 three types of steam as follows:

9 1) 850 pound steam

10 2) AGP 1 steam which is normally 160# steam

11 3) AGP 2 steam which is also 160# steam but used on non-critical processes

12 Q. What constitutes an outage for AGP steam?

13 A. AGP and Aquila have agreed to the following standard to class "steam outages":

14 1) 850 pound steam: If pressure drops below 765 psi for 10 minutes

15 2) AGP 1: If pressure drops below 150 psi

16 3) AGP 2: If pressure drops below 100 psi

17 Q. How has your steam service been year to date September 2005 based on these strict  
18 parameters?

19 A. Year to date through September the following "steam outages" had occurred: 623  
20 minutes for the 850 pound steam, 348 minutes for AGP 1 steam, and 237 minutes for  
21 AGP 2 steam. Of the 393,120 minutes possible during the period, steam availability is

1 99.8 % for the 850 pound service, 99.9 % for the AGP 1 service, and 99.9 % for the AGP  
2 2 service.

3 Q. Do you consider these steam reliability numbers excellent?

4 A. Yes.

5 Q. Do you think that Aquila has done an adequate job working with AGP in supplying  
6 service to them?

7 A. Yes. We meet with them on a regular basis to discuss their concerns. We have a contact  
8 that will respond to them when needed. AGP recently announced a \$55 million  
9 expansion at their soybean processing facility in St. Joseph. The expansion will increase  
10 the soybean crushing capacity of the plant 60%, making it AGP's largest facility. The St.  
11 Joseph News-Press quoted AGP's Mike Maranell, senior vice president of corporate and  
12 member relations as follows: "One of the reasons AGP decided to build at the St. Joseph  
13 facility is the relationship with the local utility. We've had a long-term relationship that's  
14 been very good. One of the things our plant requires is a lot of energy."

15 Q. Does this conclude your prefiled surrebuttal testimony?

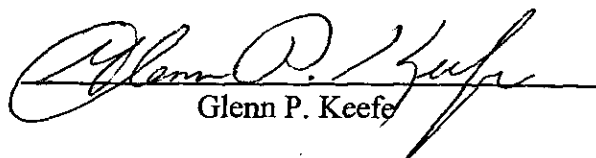
16 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

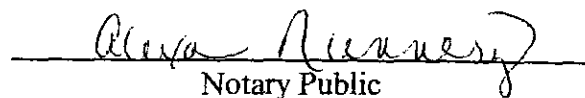
County of Jackson     )  
                                  )  
State of Missouri     )     ss

AFFIDAVIT OF GLENN P. KEEFE

Glenn P. Keefe, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying testimony entitled "Surrebuttal Testimony of Glenn P. Keefe;" that said testimony was prepared by him and under his direction and supervision; that if inquiries were made as to the facts in said testimony and schedules, he would respond as therein set forth; and that the aforesaid testimony and schedules are true and correct to the best of his knowledge, information, and belief.

  
Glenn P. Keefe

Subscribed and sworn to before me this 6<sup>th</sup> day of December, 2005.

  
Notary Public

My Commission expires:

May 4, 2008

