

**MORRISON, HECKER, CURTIS, KUDER & PARRISH**

1700 BRYANT BUILDING  
1102 GRAND AVENUE  
KANSAS CITY, MISSOURI 64106-2370  
(816) 842-3910

WASHINGTON, D.C.  
PHOENIX, ARIZONA  
DALLAS, TEXAS

TELEX 486588  
TELECOPIER (816) 474-4208

OVERLAND PARK, KANSAS  
WICHITA, KANSAS

**FILED**

**MAR 28 1990**

**PUBLIC SERVICE COMMISSION**

March 28, 1990

Mr. Harvey G. Hubbs, Secretary  
Missouri Public Service Commission  
301 West High Street  
Jefferson City, MO 65101

**FEDERAL EXPRESS**

Re: Case Nos. HM-90-4 and HA-90-5

Dear Mr. Hubbs:

The Commission has, by its Order dated December 29, 1989, approved the application of Trigen-Kansas City District Energy Corporation for permission, approval and a certificate of public convenience and necessity for it to acquire, own and operate the downtown Kansas City, Missouri central station steam heat distribution system currently owned by Kansas City Power and Light Company ("KCPL").

The Commission's Order required that as a condition of completing the purchase of KCPL's steam system, Trigen acquire the necessary permits and licenses for it to operate the steam system. Filed with this letter is the necessary required permit, i.e., Permit No. 541 dated January 29, 1990, issued by the Air Quality Section of the Health Department of Kansas City, Missouri. Trigen will also receive a transfer of 5,955 tons of sulfur dioxide emissions credits which had been banked by KCPL with the Missouri Department of Natural Resources ("DNR"); however, no prior approval of such transfer by DNR is required, and such transfer is accomplished simply by KCPL providing notice of such transfer to DNR. Such notice is being given by KCPL in conjunction with the closing of the purchase of the steam system by Trigen.

Also enclosed for filing is P.S.C.MO. No. 1, sheets 5 through 8, which provide a territorial description of the area to be served by Trigen. These sheets are made a part of the Rates for Steam Service which have previously been filed by Trigen.

Trigen and KCPL plan to execute the various sales documents on Thursday morning, March 29th. It is expected, however, that title to the steam system will not be transferred until Trigen's tariffs and rules have been approved by the Commission and become effective, and KCPL's tariffs, rules and steam service certificates

22.

MORRISON, HECKER, CURTIS, KUDER & PARRISH

Mr. Harvey G. Hubbs, Secretary  
March 28, 1990  
Page 2

have been cancelled and revoked. Counsel for Trigen and KCPL will contact the Commission's General Counsel and confirm the document execution tomorrow.

Trigen hereby requests that the Commission issue an order which simultaneously (a) approves Trigen's tariffs and rules, and grants Trigen a certificate of public convenience and necessity to provide steam service, as set forth in Trigen's filings, and (b) cancels and revokes all of KCPL's tariffs, rules and certificates of public convenience and authority related to its provision of public utility steam service.

Enclosed are fourteen copies of this letter and all enclosures, as required by the Commission's rules. Your consideration in this matter is appreciated.

Very truly yours,

MORRISON, HECKER, CURTIS, KUDER & PARRISH

*George E. Rider*

George E. Rider

GER/smh

Enclosures

cc: Ms. Martha S. Hogerty (w/enc.)  
Mr. C. Gene Fee, Hearing Examiner (w/enc.)  
Ms. Mary Ann Young (w/enc.)  
Mr. Jeremiah D. Finnegan (w/enc.)  
Mr. Mark G. English (w/enc.)  
Mr. Michael E. Pendergast (w/enc.)  
Mr. Gary Duffy (w/enc.)  
Mr. Richard Ward (w/enc.)  
Mr. Ilus Davis (w/enc.)  
Mr. Wm. Clark Kelly (w/enc.)  
Mr. John B. Williams (w/enc.)

KANSAS CITY, MISSOURI AIR QUALITY SECTION

PERMIT FOR AN AIR CONTAMINANT SOURCE

In accordance with S.18.92 and S.18.93 of the Air Quality Control Code

PERMIT No. 541

SOURCE NAME District Heating Plant (Formerly KCP&L Plant)

SOURCE ADDRESS 115 Grand Avenue

DESCRIPTION OF SOURCE, OPERATION AND CONTROL DEVICE(s) Steam generating plant that uses coal as it primary fuel. The plant uses an Electrostatic Precipitator, with continuous emission monitors for opacity and Sulfur Dioxide emission measurements.

AUTHORIZED PERSON Mr. W.G. Weed

TITLE President

TELEPHONE NUMBER -----

ADDRESS 115 Grand Avenue  
Street Number

Kansas City  
City

Missouri  
State

64106  
Zip Code

AUTHORIZED PERSON

W G Weed  
Signature

=====

DO NOT WRITE BELOW THIS LINE

=====

SOURCE INSPECTED BY: J. Nasser and M. Manning

DATE INSPECTED: November 6, 1989

CONDITIONS OF APPROVAL The attached conditions have been established as the result of ambient air modeling studies initially conducted during the Fall of 1989.

The studies were conducted to ascertain the operating conditions for the existing source that will assure the ambient air quality standards will not be violated.

This permit shall be considered a **DE MINIMUS PERMIT**.

Permission is hereby granted for the above air contaminant source(s).

DATE

2/1/90

DIRECTOR

Richard M. Stinson  
(Signature)

Attachments:



**Health Department  
Air Quality Section**

City of Kansas City, Missouri  
Heart of America

21st Floor, City Hall  
Kansas City, Missouri 64106

816-274-2501

January 29, 1990

PERMIT NO. 541

TRIGEN ENERGY CORPORATION  
GRAND AVENUE STEAM PLANT  
115 GRAND AVENUE  
KANSAS CITY, MISSOURI

**PERMIT CONDITIONS**

- 1) This permit is issued for a De Minimis increase in accordance with permit rule 18.92 (B) of the Air Quality Control Code of Kansas City, Missouri. This permit is also intended to reflect the change in ownership from KCP&L Company to Trigen Energy Corporation. The Director has therefore, determined that this transaction is not considered to be a major modification, modification or is it to be interpreted to be a new source therefore, the New Source Performance Standards do not apply.
- 2) This permit is issued for boilers 1A, 6, 7, and 8.
- 3) Continuous monitoring of opacity will continue to be required on Stack No. 2 serving units number 6,7, and 8 in accordance with Section 18.86 (D)(3)(a) of the Kansas City, Missouri Air Quality Code and 10 CSR 10-2.060 of Missouri Department of Natural Resources Rules, date amended: February 11, 1980.
- 4) All performance tests required by this permit shall be conducted in no later than Two Hundred Seventy (270) days from the issuance of this permit. Trigen shall give Thirty (30) days notice to Air Quality Section prior to any test dates so that Air Quality staff and/or Department of Natural Resources Air Pollution Control staff and/or staff from the Environmental Protection Agency can be present to observe testing.
- 5) Sulfur dioxide and gas flow rate continuous emission monitors shall be installed and be operational in no later than Two Hundred Seventy (270) days from the issuance of this permit. SO<sub>2</sub> emissions during the installation and calibration of the continuous emission monitors will be calculated from the sulfur analysis of coal samples taken every eight hours of operation of the conveyors leading to the coal bunkers.

January 29, 1990

PERMIT NO. 541

TRIGEN ENERGY CORPORATION  
GRAND AVENUE STEAM PLANT  
115 GRAND AVENUE  
KANSAS CITY, MISSOURI

PERMIT CONDITIONS

- 6) Continuous monitoring of sulfur dioxide (SO<sub>2</sub>) emissions will be required on Stack No. 2 serving units number 6, 7, and 8 to demonstrate compliance with the hourly emission limits listed below in accordance with Section 18.87 (A)(5) of the Kansas City, Missouri Air Quality Code and 10 CSR 10-2.200 of Missouri Department of Natural Resources Rules, date: March 11, 1978. The SO<sub>2</sub> continuous emission monitor shall pass a performance test conducted as prescribed in 40 CFR, Part 60, Appendix B, Specification 2.
- 7) Continuous monitoring of flow rate is required on stack No. 2 serving units number 6, 7, and 8.

The flow rate continuous emission monitor shall pass a performance test conducted as prescribed in rule 10 CSR 10-6.030 (1) and (2) of the Missouri Department of Natural Resources, Rules date amended: November 24, 1988 or 40 CFR Part 60 Appendix A Method 19.

8) SO<sub>2</sub> EMISSION LIMITS

MAXIMUM YEARLY EMISSIONS LIMIT

I) YEARLY EMISSIONS LIMIT

Yearly emissions shall not exceed 14,432 (Year 1976 SO<sub>2</sub> emissions) Tons plus 35 Tons (De Minimis increase) or a total of: 14,467 Tons Per Year.

Purchasing specification for sulfur content of coal shall not exceed four (4.0) percent.

FORMULAS TO DETERMINE  
MAXIMUM HOURLY EMISSIONS LIMIT

II) THREE (3) HOUR EMISSION LIMITATION:

MAXIMUM EMISSION RATE (LBS/3 HOURS) =  $3 \times [ 1300 + 0.01018^{\circ}(\text{FLOW RATE}) ]$

Where,

FLOW RATE is the average flow rate of any Three (3) consecutive hourly flow rates in actual cubic feet per minute.



January 29, 1990

PERMIT NO. 541

TRIGEN ENERGY CORPORATION  
GRAND AVENUE STEAM PLANT  
115 GRAND AVENUE  
KANSAS CITY, MISSOURI

PERMIT CONDITIONS

III) TWENTY-FOUR (24) HOUR EMISSION LIMITATION:

MAXIMUM EMISSION RATE (LBS/24 HOURS) =  $24 \times [ 1300 + 0.00692 \times (\text{FLOW RATE}) ]$

Where,

FLOW RATE is the average flow rate of any Twenty Four (24) consecutive hourly flow rates in actual cubic feet per minute.

- 9) A report summarizing emissions as recorded by the continuous emission monitors shall be submitted quarterly to the Air Quality Section by the 30th day of the month following the monitored calendar quarter.
- 10) Boiler 1A is to be operated on natural gas with Number 2 or 4 fuel oil as a standby. Maximum sulfur content of the fuel oil shall be restricted below 0.5 percent.
- 11) The electrostatic precipitator (ESP) shall be operated whenever coal is being used as a fuel.
- 12) Trigen shall submit a Quality Assurance Plan to the Director for approval no later than Two Hundred Seventy (270) days from the issuance of this permit.

END



# CITY OF KANSAS CITY, MISSOURI

DEPARTMENT OF HEALTH  
AIR QUALITY SECTION

INVOICE

NR89/90- 334

*Remittance Copy*

January 11, 1990

Mr. W. G. Wood  
President  
Trigen-Kansas City District Energy Corporation  
115 Grand Avenue  
Kansas City, Missouri 64106

ACCOUNTING INFORMATION		
001	046920	

Permit Application Fee (Number 89/90-334)  
for the Sources which are identified as  
shown below.

District Heating Plant, 115 Grand Avenue  
(formerly KCP&L plant), IC #541.

Category:

140 hours @ \$36.50/hour review time  
(Maximum of \$ 5000.00)

\$ 5000.00

Payment of this APPLICATION FEE is required before  
a Permit can be issued; however, the payment  
of this fee DOES NOT GUARANTEE that  
a permit will be issued.

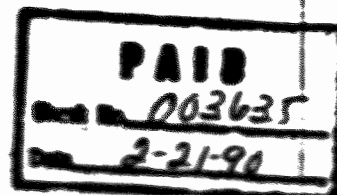
Make Checks payable to: CITY TREASURER, KANSAS CITY MISSOURI

Remit Pink Copy (attached) and Payment to:

AIR QUALITY SECTION  
21st Floor, City Hall  
Kansas City, Missouri 64106

TOTAL

\$ 5000.00



FORM NO. 13

P.S.C.MO. No. 1{ Original } SHEET No. 5  
{ Revised }

Cancelling P.S.C.MO. No. \_\_\_\_\_

{ Original } SHEET No. \_\_\_\_\_  
{ Revised }**TRIGEN-KANSAS CITY DISTRICT  
ENERGY CORPORATION**

Name of Issuing Corporation

For KANSAS CITY, MISSOURI  
Community, Town or City**RATES FOR STEAM SERVICE****TERRITORIAL DESCRIPTION****TRIGEN-KANSAS CITY DISTRICT ENERGY CORPORATION  
PUBLIC UTILITY STEAM SERVICE BOUNDARY LINE**

Beginning on the west line of Grand Avenue at 1st Street; thence southerly on the west line of Grand Avenue to a point 150 feet northerly of the northerly line of 3rd Street; thence westerly on a line measured 150 feet northerly of and parallel with the northerly line of 3rd Street to a point on the westerly line of Delaware Street; thence southerly along the westerly line of Delaware Street to the north line of 3rd Street; thence westerly along the north line of 3rd Street to the north-south alley lying between Delaware and Wyandotte Streets; thence southerly along the alley lying between Delaware and Wyandotte Streets and its southerly projection to the north line of the North Service Street of the 6th Street Trafficway; thence west along the north line of the North Service Street of the 6th Street Trafficway to a point of intersection of the east line of Central Street projected north; thence south across the 6th Street Trafficway and along said projected east line of Central Street and the east line of Central Street to the east-west alley west of Central Street and north of 8th Street; thence west along the east-west alley north of 8th Street and west of Central Street and its westerly projection thereof to the east line of Broadway; thence south along the east line of Broadway to the easterly projection of the east-west alley lying north of 10th Street and east of Washington Avenue; thence west along the east-west alley north of 10th Street and east of Washington Avenue and its easterly projection thereof to a point of intersection of the northerly projection of the most westerly north-south alley lying east of Washington Avenue and north of 11th Street; thence south along said projected north-south alley, said alley and its southerly projection thereof to the north line of 11th Street; thence west along the north line of 11th Street to the east line of Washington Avenue; thence south along the east line of Washington Avenue to a point 290 feet north of the north line of 13th Street; thence east along a line drawn 290 feet north of and parallel with the north line of 13th Street to the east line of Broadway;

\*Indicates new rate or text

+Indicates change

DATE OF ISSUE 03 29 90  
month day year

DATE EFFECTIVE \_\_\_\_\_ month day year

ISSUED BY W. G. WEED, PRESIDENT  
name of officer115 GRAND AVENUE  
KANSAS CITY, MO 64106  
address



FORM NO. 13

P.S.C.MO. No. 1{ Original } SHEET No. 6  
{ Revised }

Cancelling P.S.C.MO. No. \_\_\_\_\_

{ Original } SHEET No. \_\_\_\_\_  
{ Revised }**TRIGEN-KANSAS CITY DISTRICT  
ENERGY CORPORATION**For KANSAS CITY, MISSOURI  
Community, Town or City

Name of Issuing Corporation

**RATES FOR STEAM SERVICE**

thence south along the east line of Broadway to the north line of 14th Street; thence east along the north line of 14th Street to the east line of Wyandotte Street; thence south along the east line of Wyandotte Street to the north line of the Mid-Town Freeway; thence east along the north line of the Mid-Town Freeway to the east line of McGee Street; thence north along the east line of McGee Street to a point of intersection of the westerly projection of the east-west alley lying south of 13th Street between Oak and Locust Streets; thence easterly along said projected east-west alley, said east-west alley and its easterly projection thereof to the east line of Cherry Street; thence south along the east line of Cherry Street to the north line of 14th Street; thence easterly along the north line of 14th Street to the west line of Holmes Street; thence north along the west line of Holmes Street to the south line of 13th Street; thence east along the south line of 13th Street to the north-south alley lying between Holmes and Charlotte Streets; thence north along the north-south alley between Holmes and Charlotte Streets to a point 185 feet north of 12th Street; thence west along a line drawn 185 feet north of and parallel with the north line of 12th Street to the west line of Holmes Street; thence south along the west line of Holmes Street to the south line of 12th Street; thence west along the south line of 12th Street to the west line of Locust Street; thence north along the west line of Locust Street to the south line of 10th Street; thence west along the south line of 10th Street to the north-south alley between Oak and McGee Streets; thence north along the north-south alley between Oak and McGee Streets and its northerly projection thereof to the north line of 8th Street; thence east along the north line of 8th Street to the west line of Holmes Street; thence north along the west line of Holmes Street to a point 90 feet north of the north line of Admiral Blvd.; thence west along a line drawn 90 feet north of and parallel with the north line of Admiral Blvd. to the east line of McGee Street; thence north along the east line of McGee Street to the north line of the South Service Road of the 6th Street Trafficway; thence west along the north line of the South Service Road of the 6th Street Trafficway to the east side of the Grand Avenue Viaduct over the 6th Street Trafficway; thence north across the 6th Street

\*Indicates new rate or text

+Indicates change

DATE OF ISSUE 03 29 90  
month day year

DATE EFFECTIVE \_\_\_\_\_ month day year

ISSUED BY W. G. WEED, PRESIDENT  
name of officer115 GRAND AVENUE  
KANSAS CITY, MO 64106  
title address

FORM NO. 13

P.S.C. MO. No.

1

{ Original }  
{ Revised }

SHEET No. 7

Cancelling P.S.C. MO. No.

{ Original }  
{ Revised }

SHEET No.

TRIGEN-KANSAS CITY DISTRICT  
ENERGY CORPORATION

Name of Issuing Corporation

For KANSAS CITY, MISSOURI  
Community, Town or City

## RATES FOR STEAM SERVICE

Trafficway and continuing northerly along the east line of Grand Avenue to the south line of Missouri Avenue; thence east along the south line of Missouri Avenue to the first north-south alley west of Oak Street; thence north along the first north-south alley west of Oak Street to a point 180 feet north of the north line of 3rd Street; thence west along a line drawn 180 feet north of and parallel with the north line of 3rd Street to the east line of Grand Avenue; thence north along the east line of Grand Avenue to 1st Street; thence westerly to the point of beginning.

All streets and alleys referred to above are as now established and are located within the City of Kansas City, Jackson County, Missouri.

The above described territory is further depicted in the map attached to P.S.C. Mo. No. 1 Sheet No. 8.

\*Indicates new rate or text  
+Indicates change

DATE OF ISSUE 03 29 90  
month day yearDATE EFFECTIVE  
month day yearISSUED BY W. G. WEED, PRESIDENT  
name of officer115 GRAND AVENUE  
KANSAS CITY, MO 64106  
title address

FORM NO. 13

P.S.C.MO. No.

1

Original

SHEET No.

8

Cancelling P.S.C.MO. No.

Revised

Original

SHEET No.

Revised

TRIGEN-KANSAS CITY DISTRICT  
ENERGY CORPORATION

Name of Issuing Corporation

For KANSAS CITY, MISSOURI

Community, Town or City

## RATES FOR STEAM SERVICE

Map with this  
page held in  
retention

\*Indicates new rate or text

†Indicates change

DATE OF ISSUE 03 29 90  
month day yearDATE EFFECTIVE  
month day yearISSUED BY W. G. WEED, PRESIDENT  
name of officer115 GRAND AVENUE  
KANSAS CITY, MO 64106

title

address