

**Exhibit No.:**  
**Issues:** *South Harper Peaking Facility*  
**Witness:** *Michael C. Blaha*  
**Sponsoring Party:** *Calpine Central, L.P.*  
**Type of Exhibit:** *Direct Testimony*  
**Case No.:** *ER-2005-0436*  
**Date Prepared:** *October 14, 2005*

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

**CASE NO. ER-2005-0436**

In the Matter of Aquila, Inc. d/b/a Aquila Networks-MPS and  
Aquila Networks-L&P for Authority to File Tariffs Increasing  
Electric Rates for the Service Provided to Customers in  
the Aquila Networks-MPS and Aquila-L&P Area

Submitted on behalf of CALPINE CENTRAL, L.P.

Direct Testimony

Of

MICHAEL C. BLAHA

October 14, 2005

## DIRECT TESTIMONY OF

**MICHAEL C. BLAHA**

**CALPINE CENTRAL, L.P.**

**CASE NO. ER-2005-0436**

**Q. Please state your name, business affiliation and address.**

A. My name is Michael C. Blaha. I am Director, Price Forecasting for Calpine Corporation (“Calpine”). My business address is 717 Texas Avenue, Suite 1000, Houston, Texas 77002.

**Q. Please describe you business experience and educational background.**

A. I became an employee of Calpine in October 2000. In my current position I am responsible for the long term forecast of electric prices throughout the North American Interconnect Network. I provide energy price forecasts, capacity price forecasts and market fundamentals in support of Calpine's investment decisions, structured transactions and the long-term forward curves. Prior to joining Calpine, I co-founded Altos Management Partners and prepared market assessments to support investment decisions and financing due diligence for various clients, including Calpine. Prior to Altos, I was under contract to PanEnergy in connection with its expansion into the merchant electric business. I assisted PanEnergy with and through its merger with Duke Energy Corp. From 1990 to 1995, I worked for CSW Energy, the independent power producer of Central and South West Corp. (CSW). During this tenure I participated in the development of CSW Energy's first six cogeneration ventures in four states. I also managed the asset optimization efforts on these facilities. From 1989 to 1990, I was the assistant project manager of the proposed 2,000 MW Thousand Springs coal facility in Nevada, that was being developed by a subsidiary of Sierra

1 Pacific Resources, Inc. From 1982 to 1989, I worked for CSW Services, the management  
2 arm of Central and South West, in Financial Planning. My duties included managing the  
3 system generation expansion plans of the Central and Southwest system of four electric  
4 operating companies across Texas, Oklahoma, Louisiana and Arkansas. In all, I have more  
5 than twenty-three years of experience in utility and merchant power business. I received a  
6 B.S. degree in Chemistry and Computer Science from Iowa State University in 1979. I  
7 received an M.B.A. from Texas A&M University in 1981, while concurrently completing all  
8 my course work for a Ph.D. in Physical Chemistry. I am a member of Phi Lambda Upsilon,  
9 which is the National Chemical Honorary Society.

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

11 A. While this rate case involves multiple complex issues, my comments will focus  
12 primarily on three main points. First, I will discuss the transfer pricing of the turbines  
13 utilized in the Harper Peaking Facility (“Harper”) facility. Second, I will discuss the cost  
14 differential associated with the dispatch of the higher heat rate units at Harper as opposed to  
15 combined cycle facilities such as Calpine’s Aries plant. Additionally, I will address Aquila’s  
16 failure to consider multiple market alternatives prior to constructing Harper.

17 **Q. Are you sponsoring any appendices?**

18 A. Yes, I am sponsoring several appendices. Appendix A is a PowerPoint slide show  
19 illustrating Harper’s cost ineffectiveness relative to the Aires facility. Appendix B was used  
20 to develop the figures illustrated in Appendix A. Appendix C is a chart describing the  
21 relative start charges and associated costs for dispatching a combined cycle facility.  
22 Appendix D is a visual illustration regarding previous offers made by Calpine relative to  
23 Harper and the “Project X” placeholder described by Aquila.

1   **Q.     Please describe the relationship of Calpine and Aquila regarding Calpine's Aries**  
2   **facility.**

3   A.     Calpine and Aquila were previously equity partners in the ownership of the Aries  
4   plant. The partnership was dissolved on March 26, 2004, at which time a contract remained  
5   in place for the offtake of the facility. On June 1, 2005, that contract expired and currently  
6   there is no relationship, contractual or otherwise, as Calpine is the sole owner of Aries.

7   **Q.     What is your understanding of the reason(s) for constructing Harper?**

8   A.     Calpine was a previous partner with Aquila in the Aries facility. As Calpine has been  
9   an active participant in multiple regulatory proceedings across the country, Calpine is  
10  familiar with the attempts by utilities to unburden their balance sheets of non-regulated assets  
11  by placing them into rate base and converting them into regulated assets. The combustion  
12  turbines deployed at Harper were previously designated as non-regulated assets. There are  
13  two choices available to produce cash flow. The generator can either be sold or used in a  
14  new generation facility. At current market conditions, the sale would most likely be at a loss.  
15  Thus, Aquila chose to transfer its cost into a regulated asset to get a guaranteed full recovery  
16  of its investment.

17  **Q.     Can you enumerate the potential impact on Aquila and its ratepayers of the**  
18  **transfer of Harper's combustion turbines from non-regulated to regulated assets?**

19  A.     Yes, according to a widely used trade publication, *Gas Turbine World*, in 2001-2002  
20  the price of a D5A (the type of combustion turbines utilized at Harper) was \$25.8 million per  
21  turbine for a total of \$77.4 million for the three units, which is approximately the amount that  
22  Aquila has requested in its rate case. In 2004-2005, the price was \$18.7 million for a total of  
23  \$56.1 million for the three units. If Aquila had sold the turbines, Aquila would have incurred

1 a loss of \$21 million. When faced with a significant write-down for capital equipment, it is  
2 not difficult to decipher why Aquila chose to construct Harper. Therefore, Aquila ratepayers  
3 are being asked to subsidize the non-regulated unit in the amount of more than \$20 million  
4 for the turbines alone.

5 **Q. Aquila needs generation capability to support its peak and reserve margins, why**  
6 **not Harper?**

7 A. Aquila has two basic alternatives to meeting its need for generation facilities. Aquila  
8 can either build or contract. The preferred choice should be the most cost effective  
9 alternative. From the ratepayer's perspective, the most cost effective alternative has the least  
10 impact on increasing rates. Harper fails the cost effectiveness test on two points. First, when  
11 Aquila decided to build a peaking plant at Harper, Aquila could have purchased the  
12 combustion turbines for \$56.1 instead of transferring the turbines at cost from its unregulated  
13 affiliate. But more importantly, Aquila could have used the current favorable market  
14 conditions to purchase power and obtain even more cost effective electricity.

15 **Q. What kind of savings could the ratepayer realize if Aquila had decided to**  
16 **purchase rather than build?**

17 A. Again, this is a difficult question to answer since Harper is a peaking unit while Aries  
18 is a cycling unit. The published heat rate for the combustion turbines utilized at Harper is  
19 10,922 BTU/kWh (HHV). The actual average heat rate at Aries during 2004 was 7,721  
20 BTU/kWh (HHV). The design full load heat rate at Aries during 2004 is 7,160 BTU/kWh  
21 (HHV). The 10,922 BTU/kWh at Harper does not include start fuel nor degradation due to  
22 wear and tear or partial loadings. Energy produced from Aries is at least forty (40) percent  
23 cheaper than energy from Harper. Using Aries annual average heat rate and assuming a

1 natural gas price of \$7.50 per MMBtu this equates to a savings of \$28 per MWh or .28 cents  
2 per kWh. Currently natural gas prices are close to \$10 per MMBtu which equates to a  
3 savings of \$37 per MWh or 0.37 cents per kWh.

4 **Q. Has Calpine made offers to Aquila that would allow them to realize these**  
5 **savings?**

6 A. Yes. Calpine has made several offers over the last three years. Unfortunately,  
7 Calpine has not received any significant feedback from Aquila as to the perceived  
8 deficiencies in any of the proposals.

9 **Q. Would any of these proposals have resulted in lower costs for ratepayers as**  
10 **opposed to construction of Harper?**

11 A. Yes. In fact all of the proposals that Calpine has submitted would have resulted in  
12 lower costs to ratepayers when compared to both the Harper construction costs as well as the  
13 "Project X" PPA that Aquila has previously pointed to in this proceeding (see Appendix D).

14 **Q. Earlier in your testimony, you stated that the Aries contract expired. What were**  
15 **the risks associated with letting the Aries contract expire?**

16 A. By not having additional capacity and energy available on a firm basis, Aquila has  
17 subjected its ratepayers to significant risk. On more than one occasion since the Aries  
18 contract expired in June 2005, Aquila has procured power from as far away as south  
19 Louisiana in order to meet its load demands. The additional costs transmission and other  
20 associated with importing power to the Aquila system will be passed on to ratepayers.  
21 Additionally, if the transmission capacity had not been available, then it is possible that  
22 system instability and/or service interruptions could have occurred.

1   **Q.     Aquila has cited the high start costs at Aries as one reason for building the South**  
2   **Harper Peaking Facility instead of contracting for capacity from Aries. How much**  
3   **merit does this argument have?**

4   A.     This argument has little merit. Although the cost of starting a combined cycle power  
5   plant such as Aries is higher than the starting a simple cycle plant such as South Harper, the  
6   Aries power plant is so much more efficient than the South Harper Peaking Facility that the  
7   difference in start costs are recovered in less than 2 hours of running Aries versus Harper (see  
8   Appendix C).

9   **Q.     In your opinion, what would have been the most prudent course of action for**  
10  **Aquila regarding the Harper facility?**

11  A.     Setting aside the legal and zoning issues and all of the accompanying appeals and  
12  costs, it is fair to say that there were multiple market alternatives to the construction of a new  
13  facility. Aquila could have entered into long term market purchases that would have been  
14  able to meet its current load demands without having to take on the additional risks and  
15  capital costs associated with construction of a new facility. Furthermore, entering into these  
16  contracts would have resulted in lower costs for ratepayers and would have eliminated the  
17  risk and uncertainty taken on by Aquila.

18  **Q.     Can you summarize your testimony?**

19  A.     From the ratepayer's perspective, Harper is not currently the most cost effective  
20  system expansion alternative available to Aquila. Rather, Harper was constructed to recoup  
21  Aquila's investment in non-regulated assets by transferring the non-regulated investment into  
22  rate base and consequently obligating the ratepayer the backstop. There currently exist other  
23  market based alternatives with lower heat rates but similar capacity costs as Harper. Clearly,

1 the most cost effective alternative for Aquila's ratepayers is any alternative with lower  
2 capacity prices and lower production. Currently, the most cost effective sources of  
3 generation are purchases from the existing excess generation fleet.

4 **Q. Does this conclude your testimony?**

5 A. Yes.





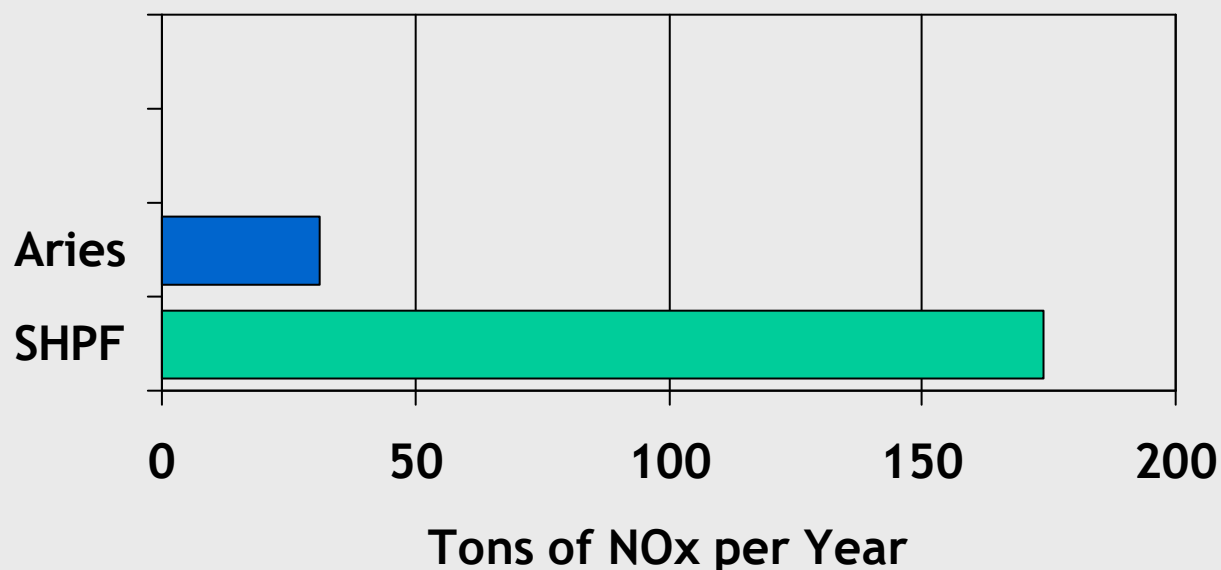
# Meeting with MPSC Staff

June 15, 2005



## ARIES WILL PRODUCE THE SAME AMOUNT OF ELECTRICITY WITH SIGNIFICANTLY LESS POLLUTION COMPARED TO SIMPLE CYCLE PEAKING PLANT

### Polution Reduction



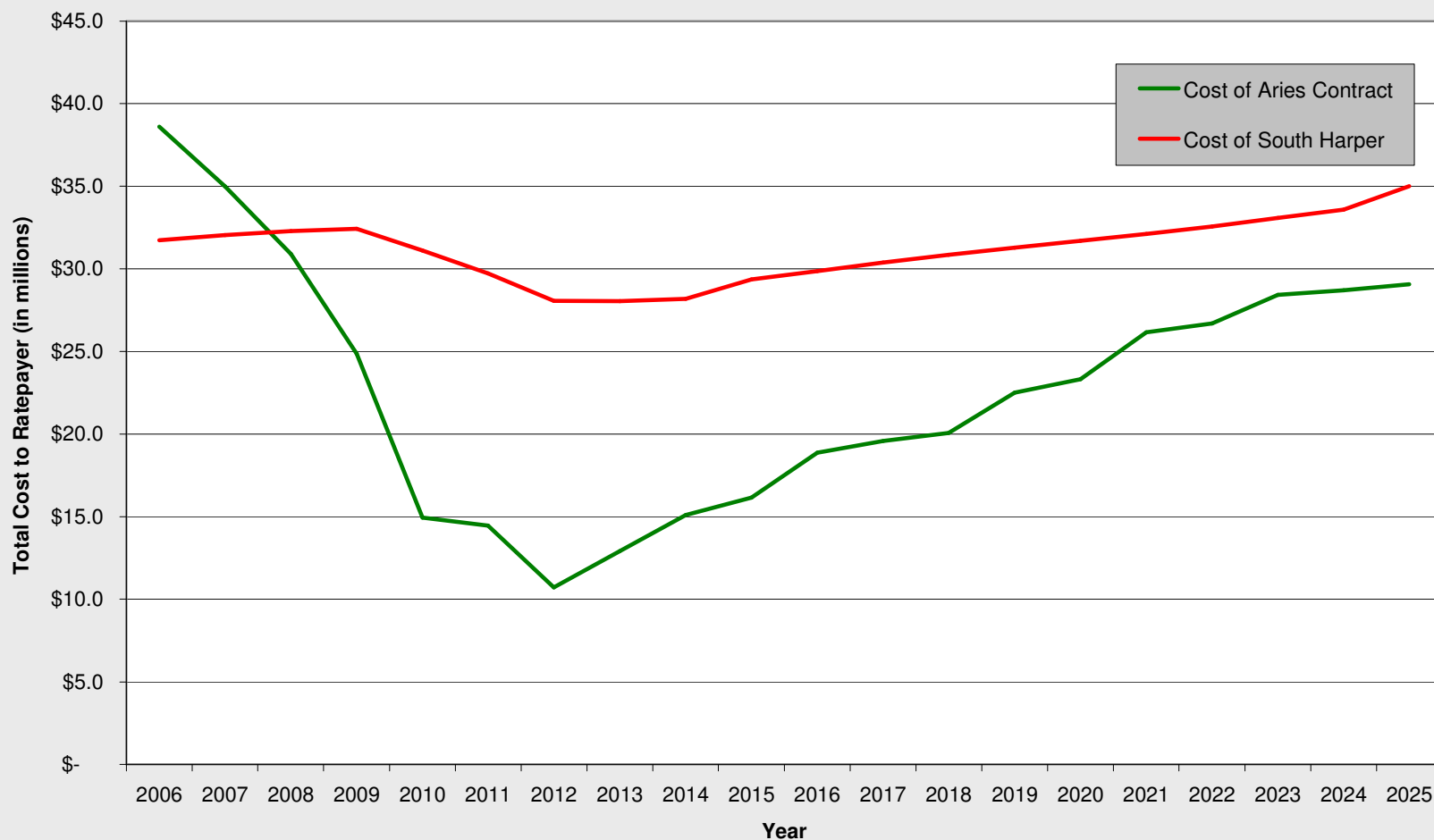
*A Simple cycle peaker would produce 173 Tons per year (over 5 times) more emissions than Aries generating the same amount of energy\*.*

*\*assumes that SHPF has an annual capacity factor of 10%*



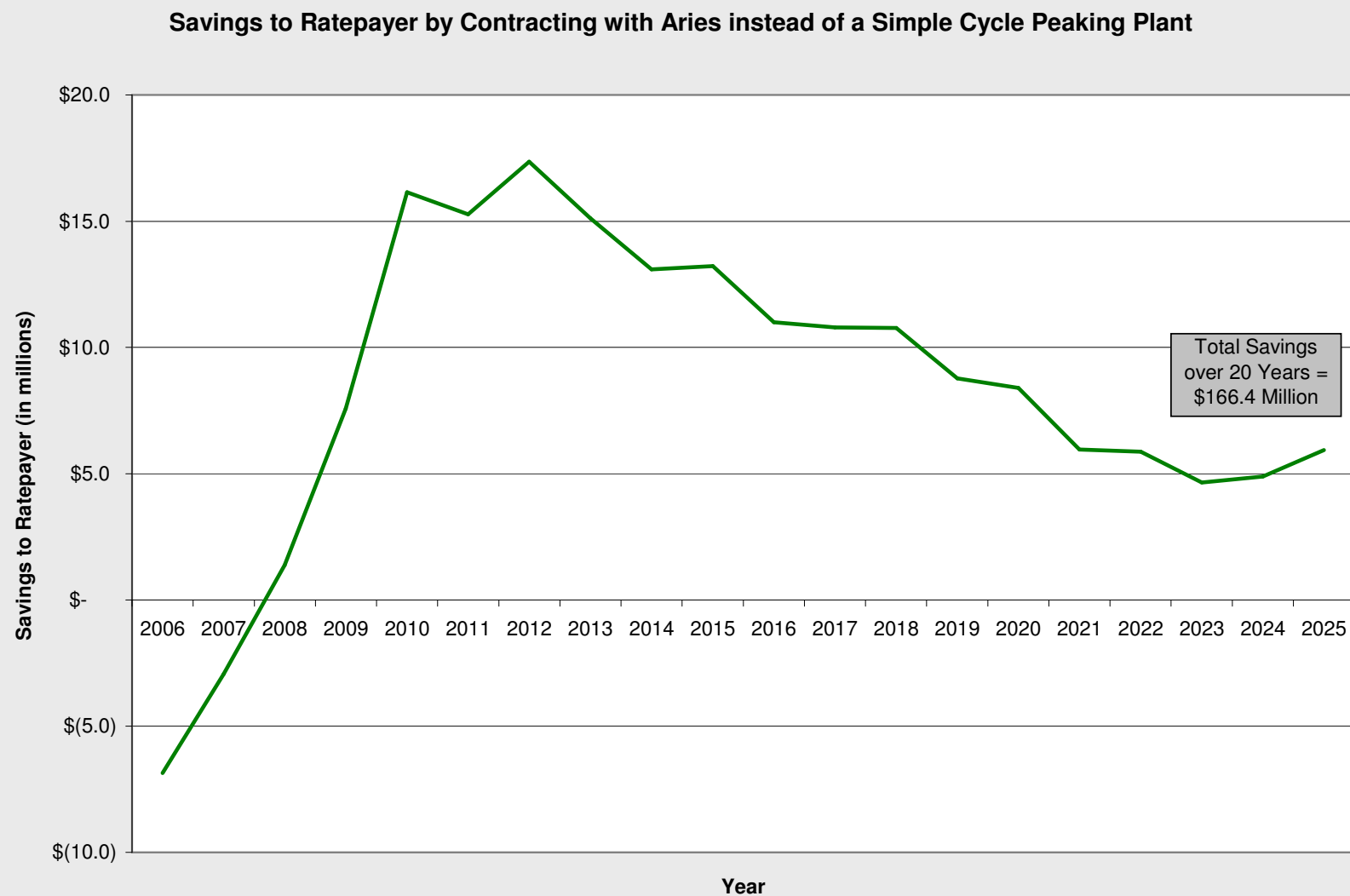
## COSTS TO RATE PAYERS OF A SIMPLE CYCLE PEAKING PLANT COMPARED TO ARIES - ANNUALIZED

Simple Cycle Peaking Plant vs. Aries





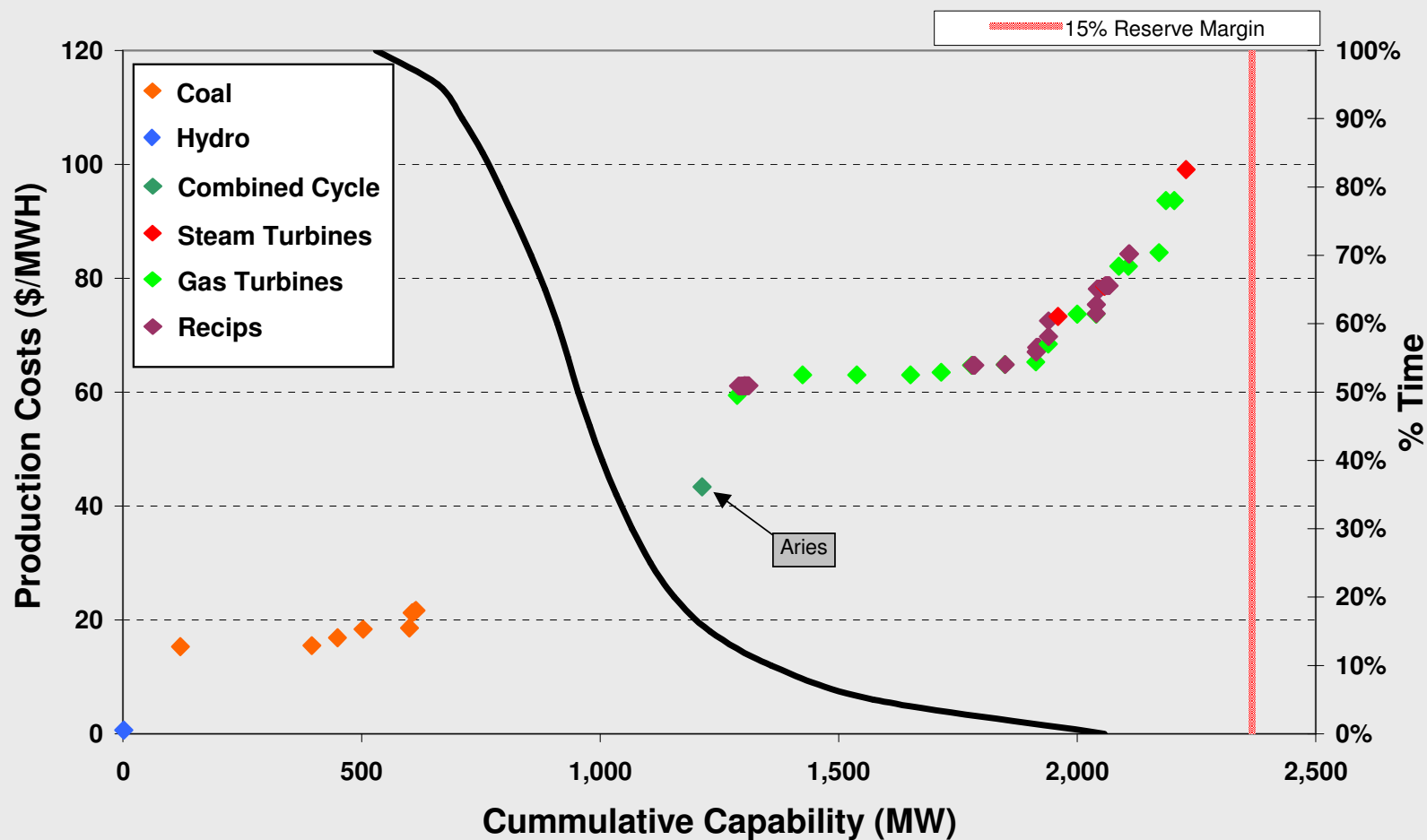
## SAVINGS TO RATE PAYERS BY CONTRACTING WITH ARIES - ANNUALIZED





## AQUILA GENERATION STACK AND LOAD - 2006

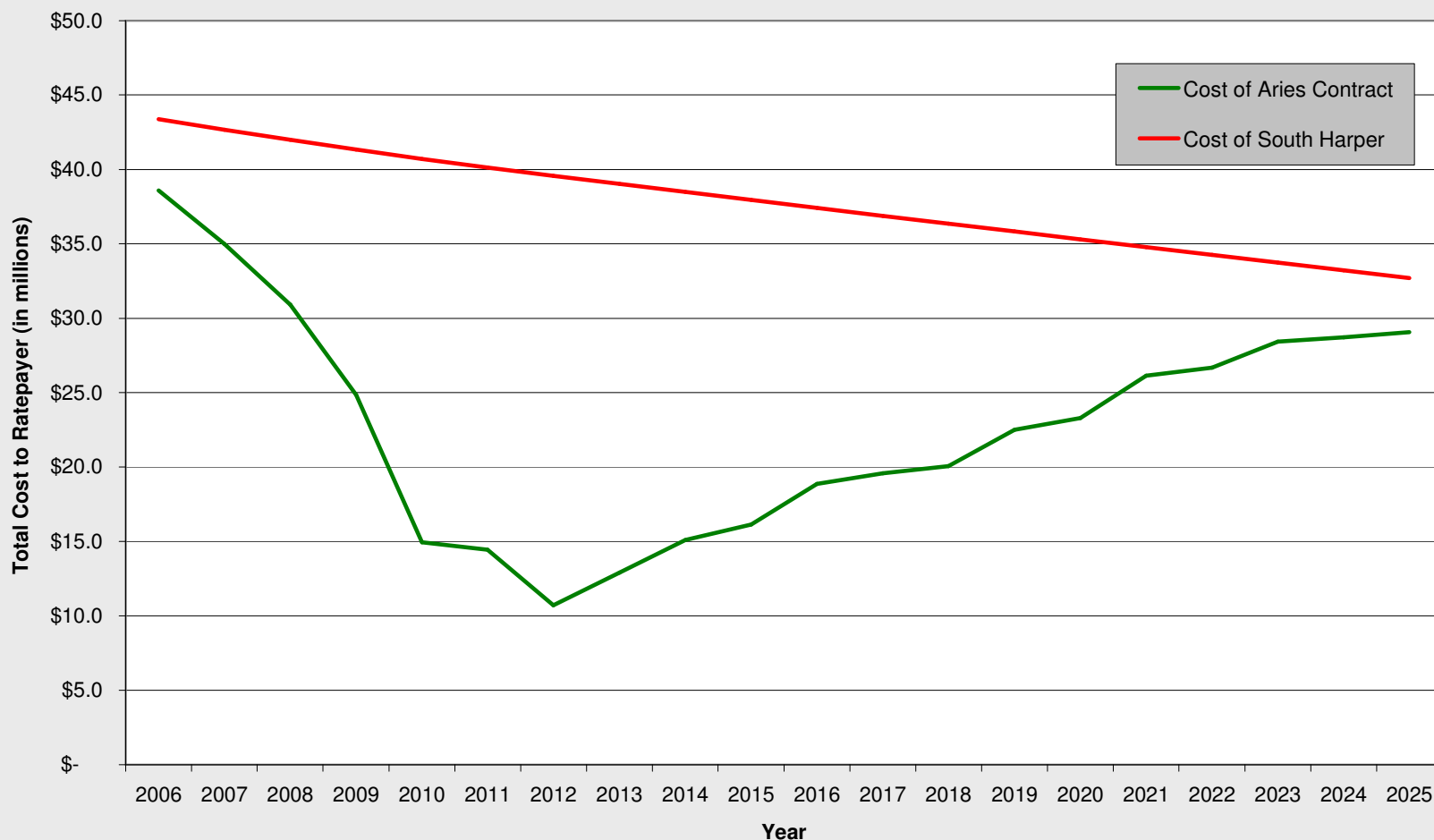
### Supply Stack & Load Duration Curve





## COSTS TO RATE PAYERS OF A SIMPLE CYCLE PEAKING PLANT COMPARED TO ARIES - RATE BASED

Simple Cycle Peaking Plant vs. Aries



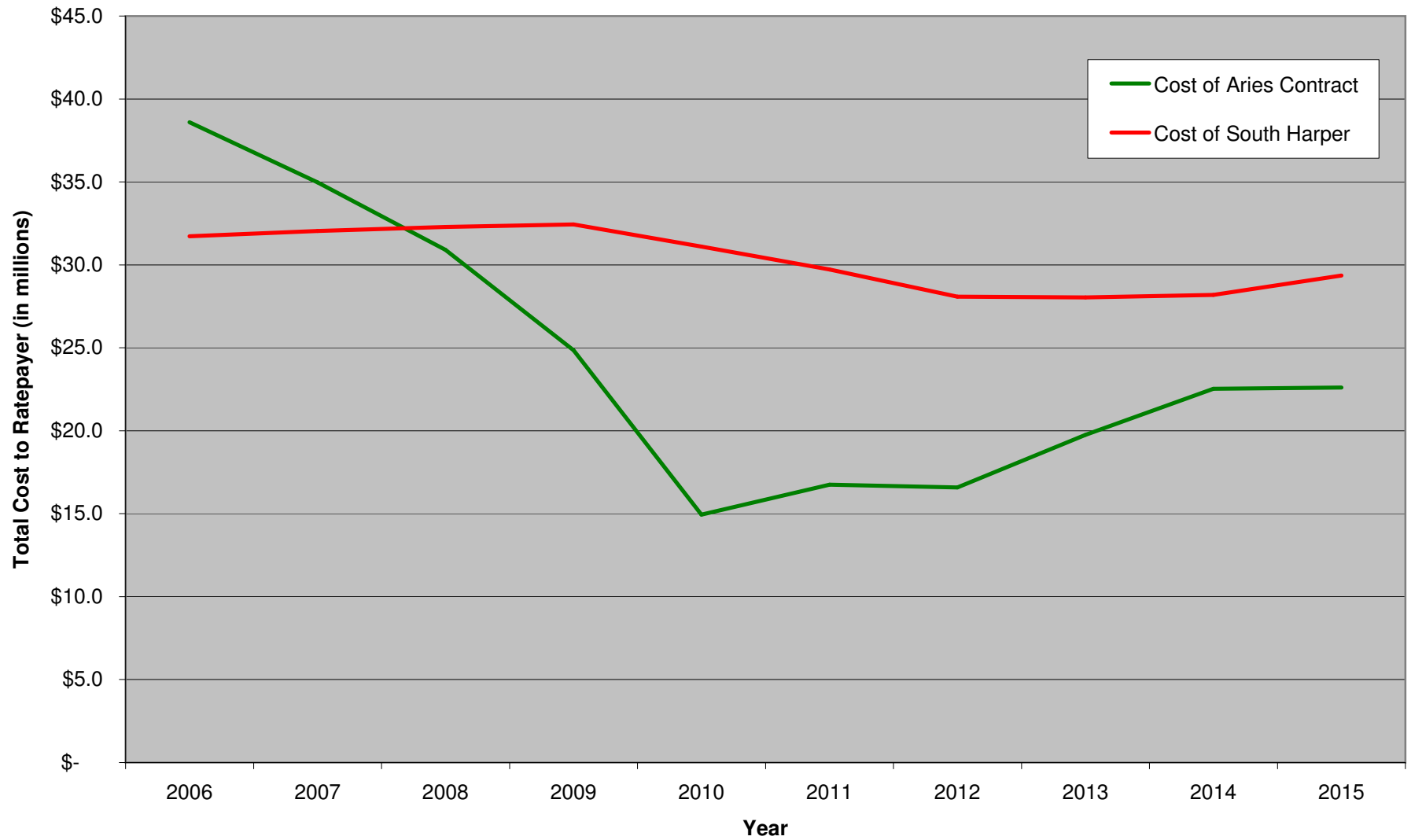


## SAVINGS TO RATE PAYERS BY CONTRACTING WITH ARIES - RATE BASED

Savings to Ratepayer by Contracting with Aries instead of a Simple Cycle Peaking Plant

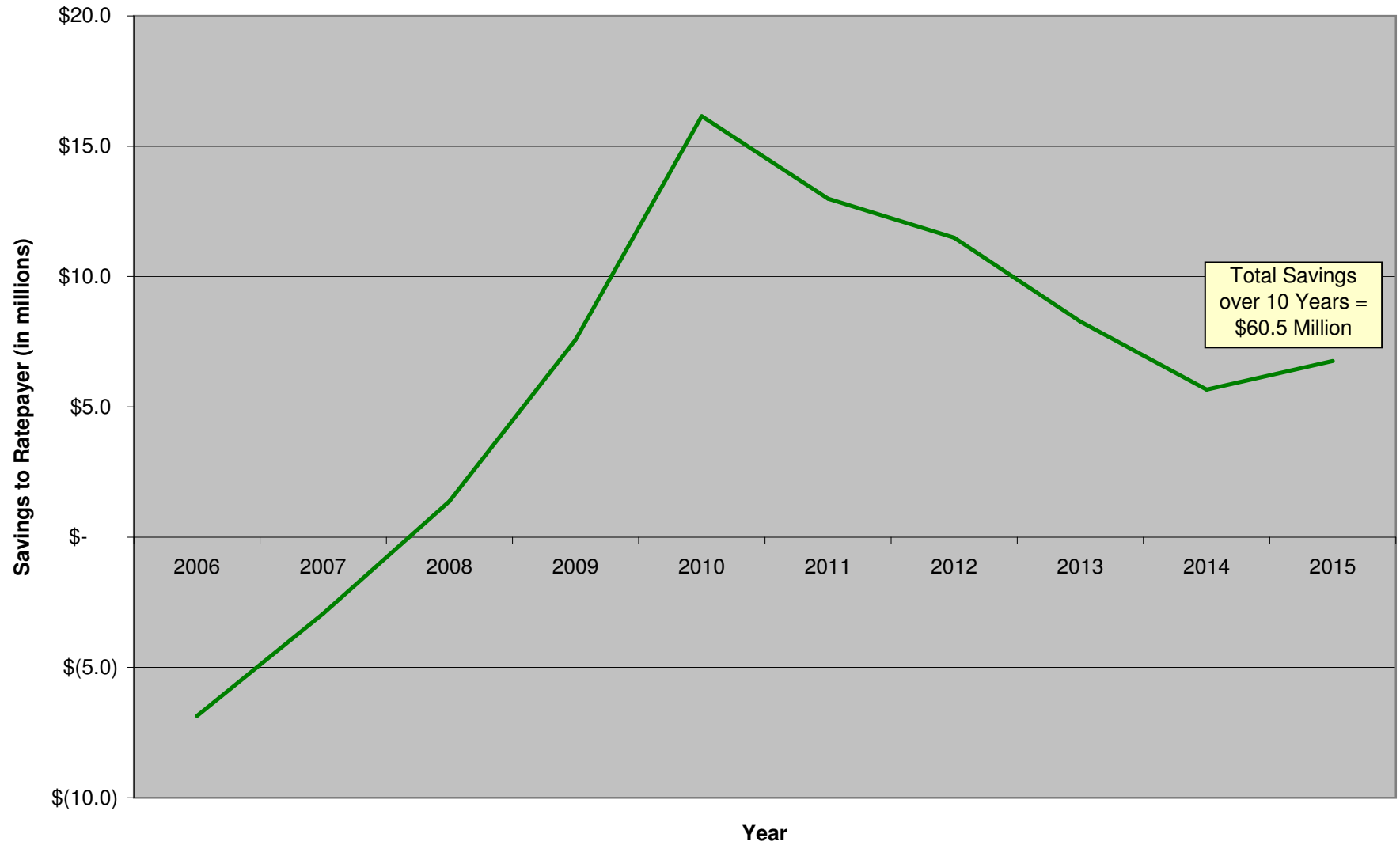


## Decision to Build South Harper Peaking Facility

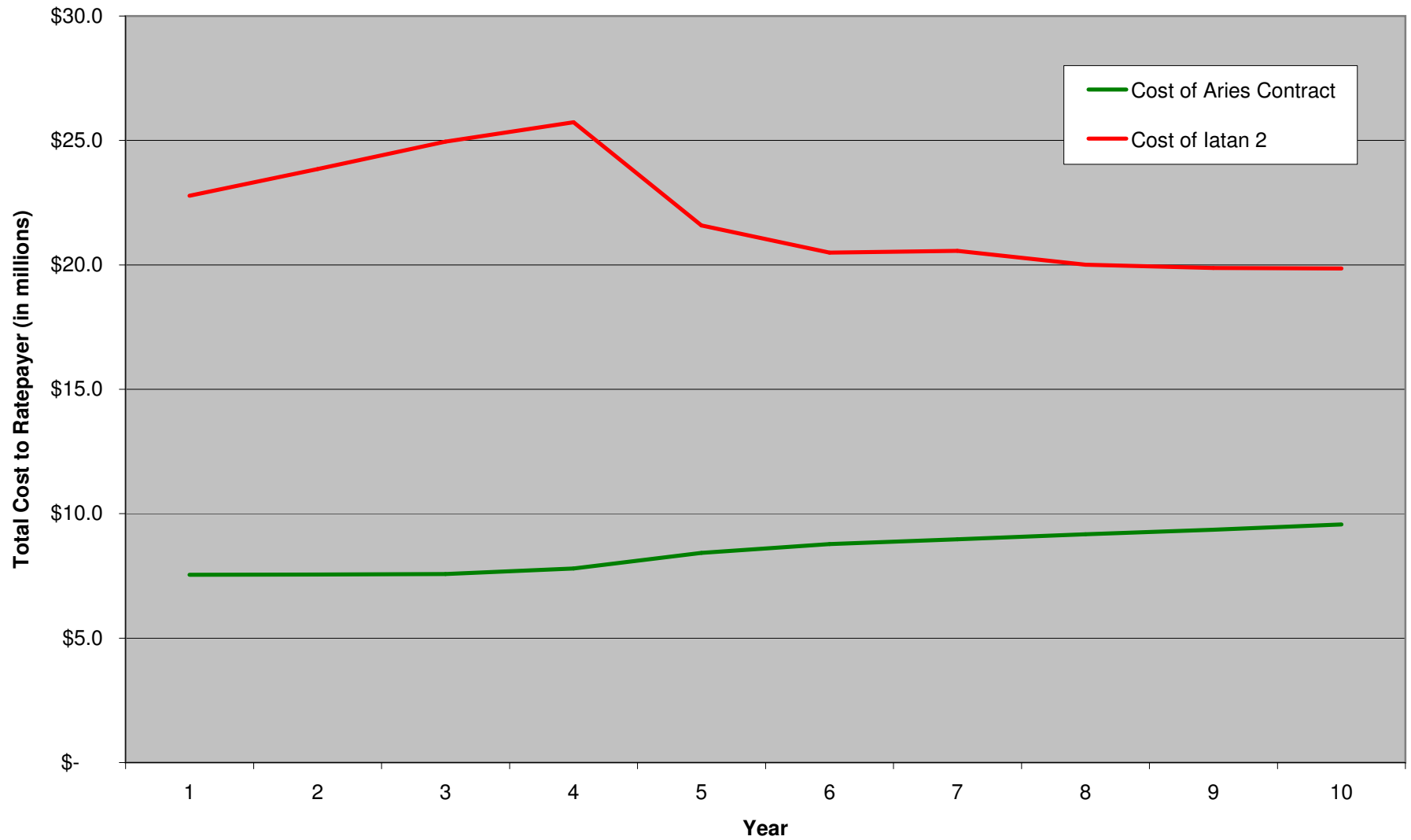




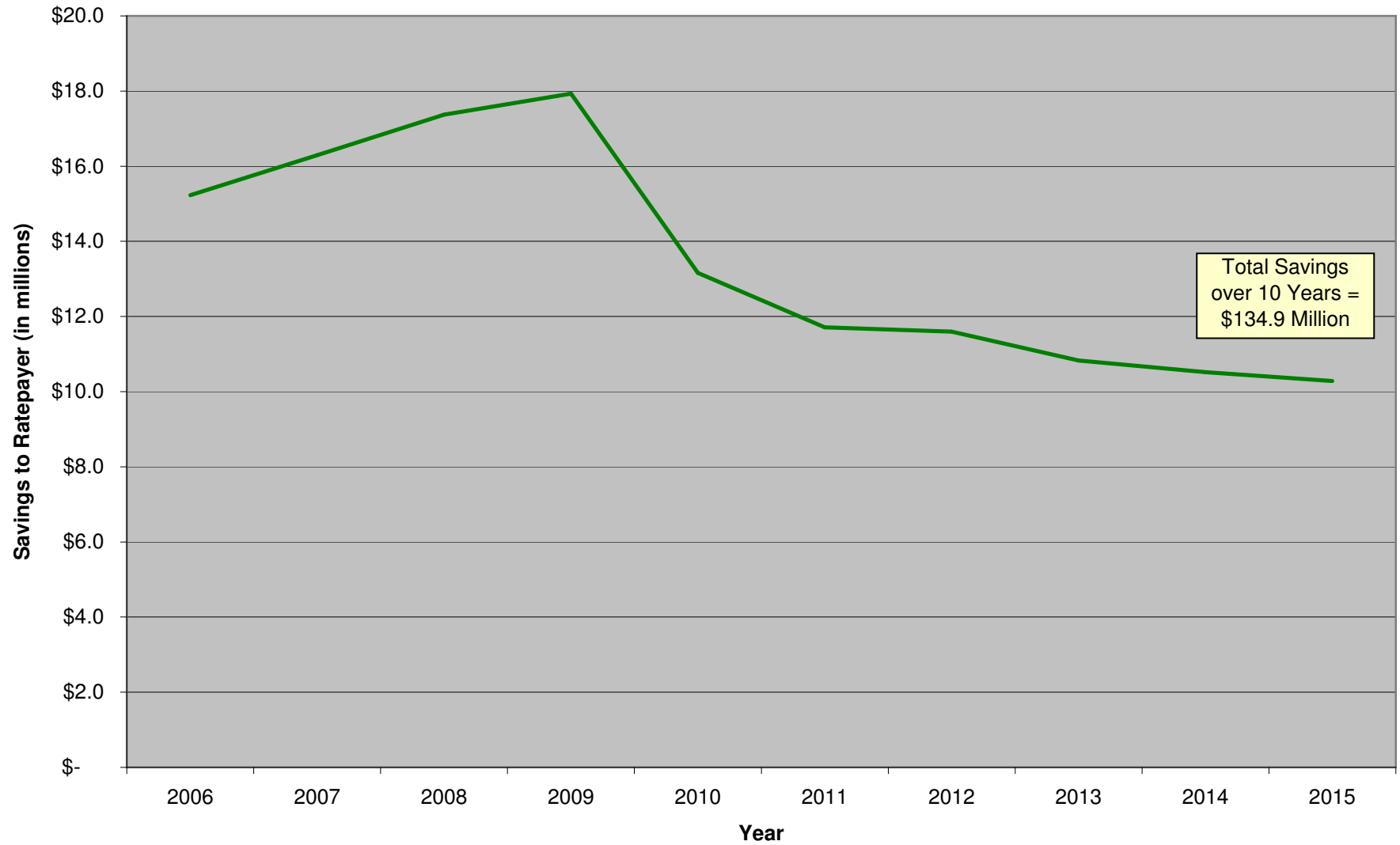
### Savings to Ratepayer by Contracting with Aries instead of Building South Harper



## Decision to Build Iatan 2



### Savings to Ratepayer by Contracting with Aries instead of Building Iatan 2



Assumptions

Plant/Unit Name	PM	Fuel	Fixed O&M (\$/kW-Yr)	Capital Cost (\$/kW)	Variable O&M (\$/MWh)	Heat Rate (Btu/kWh)	Fuel Price (\$/MMBtu)
Aries	CC	NG	\$ 13.21	\$ 590	\$ 1.93	7500	\$ 6.520
SHPF	CT	NG	\$ 9.33	\$ 415	\$ 3.89	12000	\$ 6.520
Iatan II	COL	COL	\$ 32.90	\$ 1,500	\$ 12.00	9000	\$ 1.207
		0.612					
		0.388	\$ 95.30				

Case 1 - Decision to Build SHPF (515 MW Need)						
	Supply	MW	Capacity Cost (\$/kW-Yr)	Energy Savings (\$/kW-Yr)	Net Effect to Ratepayer (\$/kW-Yr)	
Option A - Pay Aries a Capacity Payment	Aries	515	\$ 127.94	\$ 84.04	\$ 43.90	
Option B - Build SHPF	SHPF	315	\$ 86.09	\$ 23.26	\$ 62.83	
	Spot Market Purchases	200	\$ 47.85	\$ -	\$ 47.85	
Option A - Pay Aries a Capacity Payment	Supply	MW	Capacity Cost (\$/Yr)	Energy Savings (\$/Yr)	Net Effect to Ratepayer (\$/Yr)	
	Aries	515	\$ 65,888,043	\$ 43,279,837	\$ 22,608,206	
				Total	\$ 22,608,206	
Option B - Build SHPF	SHPF	315	\$ 27,119,692	\$ 7,327,444	\$ 19,792,248	
	Spot Market Purchases	200	\$ 9,569,709	\$ -	\$ 9,569,709	
				Total	\$ 29,361,957	

Case 2 - SHPF Built; No Other Builds; Decision for Aries to Leave (200 MW Need)						
	Supply	MW	Capacity Cost (\$/kW-Yr)	Energy Savings (\$/kW-Yr)	Net Effect to Ratepayer (\$/kW-Yr)	
Option A - Aries Stays	Spot Market Purchases	200	\$ 47.85	\$ -	\$ 47.85	
Option B - Aries Leaves	Spot Market Purchases	200	\$ 52.05	\$ -	\$ 52.05	
Option A - Aries Stays	Supply	MW	Capacity Cost (\$/Yr)	Energy Savings (\$/Yr)	Net Effect to Ratepayer (\$/Yr)	
	Spot Market Purchases	200	\$ 9,569,709	\$ -	\$ 9,569,709	
				Total	\$ 9,569,709	
Option B - Aries Leaves	Spot Market Purchases	200	\$ 10,409,317	\$ -	\$ 10,409,317	
				Total	\$ 10,409,317	

Case 3 - SHPF Built; Decision to Build Iatan 2 (200 MW Need)						
	Supply	MW	Capacity Cost (\$/kW-Yr)	Energy Savings (\$/kW-Yr)	Net Effect to Ratepayer (\$/kW-Yr)	
Option A - Pay Aries a Capacity Payment	Aries	200	\$ 131.89	\$ 84.04	\$ 47.85	
Option B - Build Iatan 2	Iatan 2	200	\$ 288.78	\$ 189.53	\$ 99.25	
Option C - Purchase from Spot Market	Spot Market Purchases	200	\$ 47.85	\$ -	\$ 47.85	
Option A - Pay Aries a Capacity Payment	Supply	MW	Capacity Cost (\$/Yr)	Energy Savings (\$/Yr)	Net Effect to Ratepayer (\$/Yr)	
	Aries	200	\$ 26,377,413	\$ 16,807,704	\$ 9,569,709	
				Total	\$ 9,569,709	
Option B - Build Iatan 2	Iatan 2	200	\$ 57,756,266	\$ 37,905,718	\$ 19,850,548	
				Total	\$ 19,850,548	
Option C - Purchase from Spot Market	Spot Market Purchases	200	\$ 9,569,709	\$ -	\$ 9,569,709	
				Total	\$ 9,569,709	

Option A				We Need	We Get	Shortfall	
Case1	Case2	Case3a					
2006	\$ 38,596,937	\$ 7,549,828	\$ 7,549,828	86.49	74.95	11.55	0.96
2007	\$ 34,978,012	\$ 7,555,278	\$ 7,555,278	79.78	67.92	11.86	0.99
2008	\$ 30,911,597	\$ 7,579,687	\$ 7,579,687	71.86	60.02	11.84	0.99
2009	\$ 24,856,628	\$ 7,794,075	\$ 7,794,075	58.79	48.27	10.53	0.88
2010	\$ 14,951,868	\$ 8,422,793	\$ 8,422,793	31.46	29.03	2.43	0.20
2011	\$ 16,746,135	\$ 8,778,369	\$ 8,778,369	28.05	32.52	-4.46	-0.37
2012	\$ 16,586,102	\$ 8,968,856	\$ 8,968,856	20.82	32.21	-11.39	-0.95
2013	\$ 19,756,778	\$ 9,174,691	\$ 9,174,691	25.07	38.36	-13.29	-1.11
2014	\$ 22,530,968	\$ 9,353,363	\$ 9,353,363	29.31	43.75	-14.44	-1.20
2015	\$ 22,608,206	\$ 9,569,709	\$ 9,569,709	31.35	43.90	-12.55	-1.05

Option B							
2007	\$ 32,044,522	\$ 8,150,636	\$ 23,849,210				
2008	\$ 32,286,851	\$ 8,342,967	\$ 24,950,748				
2009	\$ 32,431,040	\$ 8,626,050	\$ 25,726,650				
2010	\$ 31,108,101	\$ 9,285,299	\$ 21,585,763				
2011	\$ 29,728,624	\$ 9,640,876	\$ 20,489,091				
2012	\$ 28,076,338	\$ 9,831,362	\$ 20,566,325				
2013	\$ 28,033,253	\$ 10,021,932	\$ 20,003,510				
2014	\$ 28,187,327	\$ 10,192,971	\$ 19,875,265				
2015	\$ 29,361,957	\$ 10,409,317	\$ 19,850,548				

Savings							
Case1	Case2	Case3a					
2006	\$ (6,865,878)	\$ 503,765	\$ 15,227,363				
2007	\$ (2,933,490)	\$ 595,358	\$ 16,293,933				
2010	\$ 16,156,233	\$ 862,506	\$ 13,162,970				
2011	\$ 12,982,490	\$ 862,506	\$ 11,710,722				
2012	\$ 11,490,236	\$ 862,506	\$ 11,597,469				
2013	\$ 8,276,475	\$ 847,241	\$ 10,828,819				
2014	\$ 5,656,359	\$ 839,608	\$ 10,521,901				
2015	\$ 6,753,751	\$ 839,608	\$ 10,280,838				

Chart Data				Case 2			
Case 1	Option A	Option B	Savings	Option A	Option B	Savings	
2006	\$ 38.6	#REF!	\$ (6.9)	2006	\$ 7.5	#REF!	\$ 15.2
2007	\$ 35.0	\$ 32.0	\$ (2.9)	2007	\$ 7.6	\$ 23.8	\$ 16.3
2008	\$ 30.9	\$ 32.3	#REF!	2008	\$ 7.6	\$ 25.0	#REF!
2009	\$ 24.9	\$ 32.4	#REF!	2009	\$ 7.8	\$ 25.7	#REF!
2010	\$ 15.0	\$ 31.1	\$ 16.2	2010	\$ 8.4	\$ 21.6	\$ 13.2
2011	\$ 16.7	\$ 29.7	\$ 13.0	2011	\$ 8.8	\$ 20.5	\$ 11.7
2012	\$ 16.6	\$ 28.1	\$ 11.5	2012	\$ 9.0	\$ 20.6	\$ 11.6
2013	\$ 19.8	\$ 28.0	\$ 8.3	2013	\$ 9.2	\$ 20.0	\$ 10.8
2014	\$ 22.5	\$ 28.2	\$ 5.7	2014	\$ 9.4	\$ 19.9	\$ 10.5
2015	\$ 22.6	\$ 29.4	\$ 6.8	2015	\$ 9.6	\$ 19.9	\$ 10.3

Number of days plant ran during 1 month		15					
Price o Fuel \$/MMBtu		\$	7.00				
				Simple Cycle			
				Peaking			
		Aries		Plant			
Capacity MW		230		315			
Heat Rate		7.46		11.5			
VOM \$/MWh		\$	1.00	\$	0.25		
Start Fuel MMBtu		1000		200			
Major Maintenance St costs		\$	15250.5	5400			
				SC Pkr			
				Aries Variable			
				Equivalent Costs Per	SC Pkr		
				Heat Rate Hour	Equivalent savings Aries savings Aries		
		Aries			Heat Rate vs SC Pkr vs SC Pkr		
		\$/MWh	MMBtu/MWh	\$/MWh	MMBtu/MWh	\$/MWh	/month
1 Run Hours per start	\$	149.96	21.42	\$ 102.34	14.62	\$ (47.62)	\$ (164,303)
2 Run Hours per start	\$	101.59	14.51	\$ 91.54	13.08	\$ (10.05)	\$ (69,324)
3 Run Hours per start	\$	85.47	12.21	\$ 87.95	12.56	\$ 2.48	\$ 25,654
4 Run Hours per start	\$	77.41	11.06	\$ 86.15	12.31	\$ 8.74	\$ 120,633
5 Run Hours per start	\$	72.57	10.37	\$ 85.07	12.15	\$ 12.50	\$ 215,611
6 Run Hours per start	\$	69.34	9.91	\$ 84.35	12.05	\$ 15.00	\$ 310,590
7 Run Hours per start	\$	67.04	9.58	\$ 83.83	11.98	\$ 16.79	\$ 405,568
8 Run Hours per start	\$	65.31	9.33	\$ 83.45	11.92	\$ 18.14	\$ 500,547
9 Run Hours per start	\$	63.97	9.14	\$ 83.15	11.88	\$ 19.18	\$ 595,525
10 Run Hours per start	\$	62.89	8.98	\$ 82.91	11.84	\$ 20.01	\$ 690,504
11 Run Hours per start	\$	62.01	8.86	\$ 82.71	11.82	\$ 20.70	\$ 785,482
12 Run Hours per start	\$	61.28	8.75	\$ 82.55	11.79	\$ 21.27	\$ 880,461
13 Run Hours per start	\$	60.66	8.67	\$ 82.41	11.77	\$ 21.75	\$ 975,439
14 Run Hours per start	\$	60.13	8.59	\$ 82.29	11.76	\$ 22.16	\$ 1,070,418
15 Run Hours per start	\$	59.67	8.52	\$ 82.19	11.74	\$ 22.52	\$ 1,165,396
16 Run Hours per start	\$	59.27	8.47	\$ 82.10	11.73	\$ 22.83	\$ 1,260,375

Calpine Capacity and Energy Offers to Aquila

