

DATA REQUEST– Set Dogwood_20081106

Case: EE-2008-0034

Date of Response: 11/19/2008

Information Provided By: Tim Rush

Requested by: Lumley Carl

Question No. : 1

Please provide access to all data request responses posted on KCP&L's CaseWorksEX website related to the current Missouri case No. EE-2008-0034.

Response:

KCP&L has granted Dogwood representatives access to the data request responses published in the Company's CaseWorksEX application subject to the requirements listed below.

- Consistent with 4 CSR 240-2.135, access to data request responses containing highly confidential information will be available to outside experts who have submitted a nondisclosure certification and legal counsel, and access to responses containing proprietary information will be available to individuals who submit a nondisclosure certification and legal counsel.
- Submittal of a signed *CaseWorksEX User Acknowledgement Form* for the case (ER-2009-0090) (attached) to receive a UserID and password from KCP&L for the CaseWorksEX application.
- Configuration of the Dogwood representative's computer systems to enable access to the CaseWorksEX application.

If you have met these prerequisites and conditions you will be contacted by a representative of KCP&L and provided your account information and a User Guide for the application.

Please remember, all information accessed through the CaseWorksEX application is subject to the confidentiality obligations set forth in Mo. Rev. Stat. § 386.480 and/or to the Protective Order effective for the relevant case and should be treated accordingly.

Please contact Tim Rush (816-556-2344) or Lois Liechti (816-556-2612) if you have any questions. Fax all *User Acknowledgement Forms* to 816-556-2110.

Attachment:

Q11_CaseWorksEX User Acknowledgement Form.pdf

CaseWorksEX User Acknowledgement Form

The GPE/KCP&L Information Security Program Charter serves to protect information assets and promote a healthy business environment. To ensure protection of Highly Confidential, Confidential, Proprietary and Sensitive information accessible in the CaseWorksEX application, access privileges are only granted with express approval of KCP&L and only after users are made aware of and agree to fulfill the responsibilities surrounding those rights.

This signature form ensures that the undersigned user ("User") is aware of the responsibilities associated with CaseWorksEX privileges and validates the User as having a business need for those privileges as well as establishing the appropriate disclosure level for the User necessary for setting CaseWorksEX privileges. CaseWorksEX privileges must be approved by a Manager or Director in KCP&L's Regulatory Affairs Department.

UserIDs and passwords assigned for access to CaseWorksEX are for the sole use of the User to which they are assigned as identified below. User agrees not to share, or allow anyone other than User to use, the UserID/password assigned to them. User is accountable for all activity associated with their UserID/password.

User acknowledges that information viewed in CaseWorksEX, printed from CaseWorksEX, or otherwise accessed or distributed from CaseWorksEX, is subject to the Protective Order(s), if any, effective in the relevant case or docket and agrees to treat such information accordingly.

Failure to comply with these requirements regarding the proper use of CaseWorksEX privileges may subject User to revocation of privileges as well as other remedies available under any relevant Protective Order(s), statutes or common law doctrines.

I, User, understand the above-stated responsibilities, and hereby confirm my agreement to fulfill such responsibilities.

User Name (Print)

Regulatory Affairs Approval & Date

User Signature & Date

User ID/Password Assigned

Docket/Case Needed by User

CaseWorksEX Administrator & Date

Nondisclosure Certificate Filed for Docket/Case?

Yes ____ (Confidential/Highly Confidential Access)

No ____ (Public Access)

DATA REQUEST– Set Dogwood_20081110

Case: EE-2008-0034

Date of Response: 12/02/2008

Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No. : 2

Please state whether KCPL maintains that wind-based generation resources provide capacity value, and if so describe in detail how they do so.

Response:

KCPL maintains that wind-based resources provide capacity value which will vary by location and wind turbine design. The quantity of the capacity for which utilities can accredit has been set forth by the Southwest Power Pool (SPP) Criteria. SPP guidelines call for a minimum of 5 years of wind generation for analysis. If actual generation is not available, correlated generation (using wind turbine manufacturer design curve) from wind speed data may be substituted. For each of the years, the generated or projected wind generated output is recorded for the top 10% of the system load during the peak month. From the data, the 15th percentile is calculated (for example using Microsoft Excel) to determine the value of wind capacity that would be available 85% of the time. This capacity value will vary by location and wind turbine specifications. The accredited value has to be updated at least once every 3 years.

DATA REQUEST– Set Dogwood_20081110

Case: EE-2008-0034

Date of Response: 12/02/2008

Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No. : 3

Please state whether KCPL plans to rely on anything other than wind resources and the DSM/EE programs described in the IRP to meet new customer capacity needs over the next 20 years, and if so describe such other items in detail and the circumstances under which KCPL would turn to such items.

Response:

In the KCPL 2008 Integrated Resource Plan, the preferred resource plan includes simple cycle combustion turbines installation in 2029 to meet the customer capacity needs.

In addition, the preferred plan under the IRP may need to be modified under high CO2 emission restrictions. Under several of the high CO2 cost scenarios modeled, resource plans that included coal retirements resulted in the lowest net present value of revenue requirements. Additional resources (nuclear) were added under these high cost CO2 scenarios.

DATA REQUEST– Set Dogwood_20081110

Case: EE-2008-0034

Date of Response: 12/02/2008

Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No.: 4

Please state whether KCPL foresees potential circumstances under which the SPP regional reserve margin will not remain at 12% or continue to use the current largest online generating units methodology for calculating the MW capacity need for such reserves, and if so describe such potential circumstances in detail.

Response:

Although circumstances may arise that lead to changes in SPP's reserve margin requirements, KCP&L is not aware of any pending circumstances under which SPP regional capacity margin will not remain at 12%.

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Case: EE-2008-0034

Date of Response: 12/02/2008

Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No.: 5

Please state whether KCPL foresees potential circumstances under which the SPP regional reserve margin will not be able to reliably accommodate additional wind-based resources constructed in the region, and if so describe such potential circumstances in detail.

Response:

KCP&L has not done an assessment of potential circumstances which regional reserve margins will not be able to accommodate additional wind.

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Case: EE-2008-0034

Date of Response: 12/02/2008

Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No.: 6

Please provide KCPL's assessment of the likelihood that SPP will implement a new reserve capacity protocol based on regional wind supply parameters rather than the capacity of the largest online generating units in the region.

Response:

KCP&L has not completed an assessment of the likelihood that SPP will implement a new reserve capacity protocol.

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Case: EE-2008-0034

Date of Response: 12/02/2008

Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No.: 7

Please identify any RTO that has already taken action as described in request number 6 and describe when and what action was taken.

Response:

KCPL knows of no other RTO's that have taken action with regard to implementing a new reserve capacity protocol pertaining to wind generation.

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Case: EE-2008-0034

Date of Response: 12/02/2008

Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No.: 8

Please identify any RTO that is planning or assessing action as described in request number 6 and describe when and what action was taken.

Response:

KCPL is not aware of any RTO that is planning to change reserve capacity protocols.

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Case: EE-2008-0034

Date of Response: 11/19/2008

Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No. : 9

Please describe any circumstances under which KCPL foresees its capacity requirements increasing more than planned for over a short period of time (less than a year) during the next five (5) years.

Response:

Our base case forecast represented the most likely outcome and we expected that there was a 50% chance that capacity requirements would actually be above this level and a 50% chance that the requirements would be below this level. The range of uncertainty in the forecast was bracketed by a high and a low case scenario, and this uncertainty was due to uncertainty in economic growth. High, low and base case scenarios of economic growth were provided to us by a vendor, Moody's, economy.com.

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Case: EE-2008-0034

Date of Response: 11/19/2008

Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No.: 10

Please explain how KCPL's IRP addresses the circumstances described in request number 9 and KCPL's response thereto.

Response:

As part of the risk assessment and strategy selection, high load forecast scenarios were modeled. The preferred plan contains sufficient capacity to meet any reasonable short-term increase in capacity requirements.

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Case: EE-2008-0034

Date of Response: 11/19/2008

Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No.: 11

At Volume one, pages 31-32 of the IRP, KCPL identifies initiatives for risk mitigation: please identify any other such measures KCPL foresees employing.

Response:

CP&L's IRP includes those measures the Company foresees employing. Per the IRP requirements, the Company continually monitors and evaluates options as part of the overall resource planning process. No additional measures have been identified at this time.

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Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No.: 12

Please provide your best estimate of the amount of time that would be required, for each of the initiatives referenced in request number 11 and KCPL's response thereto, to address any lack of capacity that may result from insufficient penetration or cost-effectiveness of the proposed DSM/EE programs.

Response:

The initiatives referenced in request number 11 are not dependent on the penetration and cost effectiveness of the proposed DSM/EE programs.

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Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No.: 13

What level of Commission Staff monitoring of capacity reserves does KCPL propose?

Response:

KCP&L has not proposed any additional monitoring of capacity reserves by the Commission Staff.

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Case: EE-2008-0034

Date of Response: 12/02/2008

Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No.: 14

Please describe any and all short-term supply capacity assessment and/or procurement plans that KCPL intends to utilize.

Response:

With the scheduled completion of Iatan-2, KCP&L does not forecast a need for short-term capacity. As a contingency against potential delays in construction/project completion, KCP&L will informally monitor capacity pricing and availability for 2010 through phone contacts with regional capacity sources. Additionally, KCP&L will have access to the RFP proposals received as part of the Aquila IRP, which is scheduled for filing in August of 2009.

DATA REQUEST– Set Dogwood_20081110

Case: EE-2008-0034

Date of Response: 11/21/2008

Information Provided By: Burton Crawford

Requested by: Lumley Carl

Question No.: 15

Please describe circumstances under which the IRP would have to be modified to procure additional purchased power.

Response:

The preferred plan under the IRP may need to be modified under high CO2 emission restrictions. Under several of the high CO2 cost scenarios modeled, resource plans that included coal retirements resulted in the lowest net present value of revenue requirements. Additional resources were added under these high cost CO2 scenarios.