

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of Kansas City Power & Light)
Company's Request for Authority to) Case No. ER-2016-0285
Implement a General Rate Increase for)
Electric Service.)



**PUBLIC COUNSEL'S RESPONSES AMEREN MISSOURI'S
SECOND SET OF DATA REQUESTS TO OPC**

37. Does Ms. Mantle agree that financial swap transactions, at fixed prices, can be used to mitigate the risk of price movements for the energy component of purchased power costs and for revenues from off-system sales of energy which would otherwise be priced only in the day-ahead or real-time spot markets? If Ms. Mantle does not unequivocally agree, please detail all reasons why such agreement without qualifications cannot be provided.

Response Prepared by: Lena Mantle

Date: 2/1/2017

Response: Yes

38. Regarding OPC's response to Ameren Missouri data request #17: Please provide a detailed explanation of and specify the bases for Ms. Mantle's statement that a "financial swap is not likely to be dependent upon a generation source." Your explanation should include a detailed description of (a) Ms. Mantle's experience as a buyer or seller (as an agent or employee of the buyer or seller) of wholesale power, and (b) Ms. Mantle's experience (as an agent or employee of a party thereto) in negotiating, entering- into, or executing financial swap transactions. If Ms. Mantle does not have any experience in (a) and/or (b), please so state separately for each of (a) and (b).

Response Prepared by: Lena Mantle

Date: 2/1/2017

Response: It is Ms. Mantle's understanding that a financial swap is based on financial contracts, not a specific source of electricity generation. Ms. Mantle has no experience as a buyer or seller (as an agent or employee of the buyer or seller) of wholesale power or as an agent or employee of a party in negotiating, entering- into, or executing financial swap transactions.

39. Regarding OPC's response to Ameren Missouri data request #29

Am Exhibit No. 753
Date 2.9.17 Reporter LB
File No. ER-2016-0285

- a. Please admit or deny the following statements (for any statement that is denied, please provide a complete explanation of the bases of such denial):
- i. Schedule 7 of the SPP Open Access Transmission Tariff is titled Long-Term Firm and Short-Term Firm Point-To-Point Transmission Service.

Response Prepared by: Lena Mantle

Date: 2/1/2017

Response: Admit

- ii. Schedule 8 of the SPP Open Access Transmission Tariff is titled Non-Firm Point-To-Point Transmission Service.

Response: Admit

- iii. Schedule 9 of the SPP Open Access Transmission Tariff is titled Network Integration Transmission Service.

Response: Admit

- b. Please explain how Ms. Mantle would have the Commission identify which "Point-to-point ("PTP") and network integration transmission service ("NITS") charges are directly tied to true purchased power and off-system sales.

Response: In response to OPC DR 8010, KCPL provided monthly HC reports containing a list of all the SPP charges and revenues for that month. At the bottom of each spreadsheet is an amount titled "Transmission expense." This expense, explained by KCPL to OPC as PTP and NITs costs, should be used as the transmission costs tied to true purchased power and off-system sales.

- c. Is it OPC's position that Day Ahead Asset Energy, Day Ahead Non-Asset Energy, Real Time Asset Energy and Real Time Non-Asset Energy in the SPP market are transmission costs? If yes, please provide a complete explanation of the basis for this claim.

Response: No

40. Regarding OPC's response to Ameren Missouri data request #34: Does OPC agree that the magnitude of *changes* in costs and revenues (included in a utility's Commission-approved FAC that allows the inclusion of such costs and revenues) in between rate cases is a relevant factor for the Commission to consider in a subsequent rate case when the Commission considers which components of fuel, purchased power and transportation, net of components of off-system sales revenue, should be included in an FAC that would be take effect starting at the conclusion of that subsequent rate case? If the answer is "no," please provide a detailed explanation of why the answer is "no."

Response Prepared by: Lena Mantle

Date: 2/1/2017

Response: Yes

41. Regarding OPC's response to Ameren Missouri data request #36. Please provide Ms. Mantle's definition of "immaterial" as she used that word, by specifying the specific dollar amount above which Ms. Mantle believes that an impact on KCP&L's total cost recovery for fuel and purchased power costs, including transportation, becomes material.

Response Prepared by: Lena Mantle

Date: 2/1/2017

Response: Ms. Mantle has not calculated a specific dollar amount.