

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI



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

THIRD SET OF DATA REQUESTS TO OPC

42. Please confirm that in order to accurately reflect Ms. Mantle's recommendation for the costs and revenues to be included in an FAC for KCP&L the following modifications [additions to Ms. Mantle's testimony as written shown in *bold/italics* and deletions shown as ~~strikeout~~] must be made to the original recommendation as it appears at lines 1-16 on page 6 of Ms. Mantle's surrebuttal testimony, so that it would read as follows:

"OPC is recommending only the following prudently incurred costs be included in KCPL's FAC:

1. Delivered fuel commodity costs *to meet its native load and make off-system sales* including:
 - a. Inventory adjustments to the commodities;
 - b. Adjustments to cost due to quality of the commodity; and
 - c. Taxes on fuel commodities;
2. The cost of transporting the commodity to the generation plants;
3. The cost of power purchased to meet its native load *and make off- system sales*; and
4. Transmission cost directly incurred by KCPL for purchased power and off system sales.

These costs would be offset by:

1. Off-system sales revenue ~~net of the cost of generation or purchased power to make those sales~~; and
2. Net insurance recoveries, subrogation recoveries and settlement proceeds related to costs and revenues included in the FAC."

Response Prepared by: Lena Mantle

Date: 2/3/2017

Response: This change is not needed to make Ms. Mantle's testimony accurate.

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Missouri Public
Service Commission

Am Exhibit No. 754
Date 2.9.17 Reporter LB
File No. ER-2016-0285

43. Please confirm that Ms. Mantle agrees that the modifications noted in question 42 are needed to accurately reflect her recommendation because:
- a. Delivered fuel commodity costs and the cost of transporting the commodity to the generation plants includes the costs of the fuel commodity and transportation of the fuel commodity that is allocated to both native load and to off-system sales;

Response: This statement contained in “a” is correct. However Ms. Mantle does not agree that a change is necessary for her testimony to be correct.

- b. The cost of the fuel commodity and associated fuel transportation was, according to Ms. Mantle’s filed surrebuttal testimony (lines 1-16 at page 6), accounted for twice - once in the line items for delivered fuel commodity cost and the cost of transporting the commodity to the generation plants and a second time in the line item for off-system sales revenue net of the cost of generation or purchases power to make those sales; and

Response: This statement contained in “b” is correct only if the reader interprets the testimony as a mathematical equation. The testimony is not a mathematical equation. Ms. Mantle does not agree that a change is necessary for her testimony to be correct.

- c. It was not Ms. Mantle’s intent to account for the costs of the fuel commodity and the associated fuel transportation twice.

Response: This statement is correct. However Ms. Mantle does not agree that a change is necessary for her testimony to be correct.

Response Prepared by: Lena Mantle
Date: 2/3/2017