

Exhibit No.:  
Issue: Plant Heat Rates and the FAC  
Witness: Burton L. Crawford  
Type of Exhibit: Surrebuttal Testimony  
Sponsoring Party: Kansas City Power & Light Company  
Case No.: ER-2016-0285  
Date Testimony Prepared: January 27, 2017

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO.: ER-2016-0285**

**SURREBUTTAL TESTIMONY**

**OF**

**BURTON L. CRAWFORD**

**ON BEHALF OF**

**KANSAS CITY POWER & LIGHT COMPANY**

**Kansas City, Missouri  
January 2017**

**SURREBUTTAL TESTIMONY**

**OF**

**BURTON L. CRAWFORD**

**Case No. ER-2016-0285**

1 **Q: Please state your name and business address.**

2 A: My name is Burton L. Crawford. My business address is 1200 Main, Kansas City,  
3 Missouri 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Kansas City Power & Light Company (“KCP&L” or “Company”) as  
6 Director, Energy Resource Management.

7 **Q: On whose behalf are you testifying?**

8 A: I am testifying on behalf of KCP&L.

9 **Q: Are you the same Burton L. Crawford who filed Direct and Rebuttal Testimony in**  
10 **this proceeding?**

11 A: Yes, I am.

12 **Q. What is the purpose of your Surrebuttal testimony?**

13 A: I will briefly address the plant heat rate issue raised by Office of the Public Counsel  
14 (“OPC”) witness John A. Robinett in his rebuttal testimony.<sup>1</sup>

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<sup>1</sup> This issue is also noted without substantive discussion in the rebuttal testimony of OPC witnesses Lena Mantle at page 14 and Charles Hyneman at page 47.

1 **Q: Beginning at page 12 of his rebuttal testimony, Mr. Robinett expresses concerns**  
2 **with the plant heat rate data filed with the Company's direct testimony, stating that**  
3 **it was not all based on testing completed within the 24 month period prior to that**  
4 **filing. Please respond to this concern.**

5 A: As part of its direct testimony and its responses to data requests in this case, the Company  
6 has provided heat rate test results that are all within 24 months of the date of the filing of  
7 the direct case. Schedule BLC-8 (HC) to my direct testimony contains a summary of the  
8 results for each of the KCP&L fossil fuel generators. These same results can also be  
9 found in either the Direct case filing or KCP&L's responses to Staff Data Requests No.  
10 0189 and No. 0309. These results can be used as a baseline against which future heat rate  
11 test results can be compared.

12 **Q: Is the provision of heat rate test results that occurred within 24 months of the filing**  
13 **acceptable for developing baselines for KCP&L?**

14 A: Yes, this information provides more current data than providing heat rate information  
15 from tests that occurred 24 months prior to the direct case filing.

16 **Q: Mr. Robinett recommends on page 17 of his rebuttal testimony that the parties work**  
17 **together to develop heat rate baselines to be used for KCP&L. What is your**  
18 **response?**

19 A: While the data provided in this case is adequate to provide such a baseline, the Company  
20 is certainly willing to discuss alternatives.

1 **Q: Mr. Robinett also recommends on page 17 of his rebuttal that the Commission**  
2 **order KCP&L to provide heat rate testing reports for each of its generating**  
3 **facilities that include heat rate curves and the data used to derive the curves as part**  
4 **of its next general rate case. What is your response?**

5 A: While the Company believes that the submission of heat rate curves is not required by  
6 rule, the Company is willing to provide heat rate curves for its base load units consistent  
7 with what it has provided in response to Staff Data Request No. 0189 in this case.

8 **Q: Does that conclude your testimony?**

9 A: Yes, it does.

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

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

**AFFIDAVIT OF BURTON L. CRAWFORD**

STATE OF MISSOURI    )  
                                  ) ss  
COUNTY OF JACKSON )

Burton L. Crawford, being first duly sworn on his oath, states:

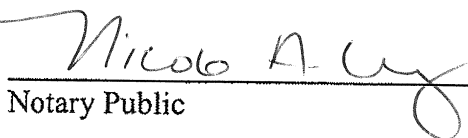
1. My name is Burton L. Crawford. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Director, Energy Resource Management.

2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Kansas City Power & Light Company consisting of three (3) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

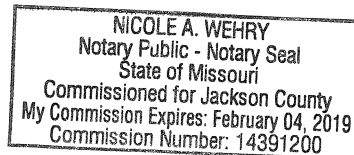
3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Burton L. Crawford

Subscribed and sworn before me this 27<sup>th</sup> day of January 2017.

  
\_\_\_\_\_  
Notary Public

My commission expires: Feb. 4, 2019



**SCHEDULE BLC-8**

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