

Missouri Joint Municipal Electric Utility Commission
MJMEUC Data Request 2 to Applicant

FILED
April 13, 2017
Data Center
Missouri Public
Service Commission

Request No: 2-1

Company Names: GREAT PLAINS ENERGY, INC., KANSAS CITY
POWER & LIGHT COMPANY, KCP&L GREATER
MISSOURI OPERATIONS COMPANY, and WESTAR
ENERGY, INC

Case No.: EM-2017-0226

Request Date: March 23, 2017

Due Date: March 28, 2017

RE: In the Matter of Great Plains Energy Incorporated for Approval of its Acquisition of
Westar Energy, Inc.

Please Provide the Following:

1. Please provide the following: Westar's current SPP Transmission Pricing Zone Rates, Kansas City Power & Light's current SPP Transmission Pricing Zone Rates, and KCP&L Greater Missouri Operations Company's current SPP Transmission Pricing Zone Rates.
 - a. If the three SPP Transmission Zones mentioned above were to be combined into one SPP Transmission Pricing Zone, would the combined SPP Transmission Pricing Zone Rates be higher in the areas included in the current KCP&L and GMO Transmission Pricing Zones, assuming current rates?
 - i. If no, please explain why not.

RESPONSE:

MJMEUC Exhibit No. 8
Date 4.5.17 Reporter AF
File No. EM-2017-0226

Response Provided by: _____



KCPL and KCPL GMO
Case Name: Application for Approval of Transaction
Case Number: EM-2017-0226

Response to Jarrett Terry Interrogatories - MJMEUC_20160323
Date of Response: 3/28/2017

Question:2/1/2017

Please provide the following: Westar's current SPP Transmission Pricing Zone Rates, Kansas City Power & Light's current SPP Transmission Pricing Zone Rates, and KCP&L Greater Missouri Operations Company's current SPP Transmission Pricing Zone Rates.

- a. If the three SPP Transmission Zones mentioned above were to be combined into one SPP Transmission Pricing Zone, would the combined SPP Transmission Pricing Zone Rates be higher in the areas included in the current KCP&L and GMO Transmission Pricing Zones, assuming current rates?
 - i. If no, please explain why not.

Response:

Please refer to the attached file, which contains the zonal (legacy zonal and Base Plan zonal) point-to-point rates for the KCP&L (Zone 6), GMO (Zone 9), and Westar (Zone 14) SPP transmission pricing zones. This rate information is from the SPP Revenue Requirements and Rates ("RRR") file for rates effective March 1, 2017 (as revised March 10, 2017). This RRR file and past RRR files are publically available on the SPP website at: <https://www.spp.org/spp-documents-filings/?id=18251>

- a. The Companies have no current plans to request that Zones 6, 9, & 14 be combined and have not performed an analysis of the potential impacts of such a combination on zonal rates.
 - i. n/a

Information Provided By: Don Frerking, Regulatory Affairs

Attachment:

Q2-1 KCPL-GMO-Westar Zonal Transmission Rates.xlsx
Q2-1_Verification.pdf

Southwest Power Pool, Inc.

Calculation of Rates for Point-To-Point Transmission Service

Kansas City Power & Light Company Zone

| Line No. | | KCPL | City of Independence, Missouri | TOTAL |
|----------|--|--|--------------------------------------|-------------|
| 1 | KCPL Revenues | \$34,142,004 | 3,309,237 | |
| 2 | KCPL Zone SPP Average 12-Mo. Peak Demand MW | 2902.63 | 2902.63 | |
| | | 2014 Historic KCPL Rate Zone SPP Average 12-Mo. Peak Demand MW | | |
| 3 | Firm Yearly Point-to-Point Rate in \$/MW - Year (Line 1 / Line 2) | \$11,762 | \$1,140.08 | \$12,902.52 |
| 4 | Firm and Non-Firm Monthly Point-to-Point Rate in \$/MW - Month (Line 3 / 12) | \$980 | \$95.01 | \$1,075.21 |
| 5 | Firm and Non-Firm Weekly Point-to-Point Rate in \$/MW - Weekly (Line 3 / 52) | \$226 | \$21.92 | \$248.13 |
| 6 | Firm and Non-Firm Daily On-Peak Point-to-Point Rate in \$/MW - Day (Line 3 / 260) | \$45.2 | \$4.38 | \$49.63 |
| 7 | Firm and Non-Firm Daily Off-Peak Point-to-Point Rate in \$/MW - Day (Line 3 / 365) | \$32.2 | \$3.12 | \$35.35 |
| 8 | Firm Hourly On-Peak Point-to-Point Rate in \$/MW - Hour (Line 3 / 4160) | \$2.83 | \$0.27 | \$3.10 |
| 9 | Firm Hourly Off-Peak Point-to-Point Rate in \$/MW - Hour (Line 3 / 8760) | \$1.34 | \$0.13 | \$1.47 |

Southwest Power Pool, Inc.

**Calculation of Base Plan Point-To-Point Rates
Zonal Point-To-Point Rate**

Kansas City Power & Light Company Zone

| <u>Description</u> | <u>Amount</u> | <u>Notes</u> |
|---|---------------|--------------------------|
| Base Plan Zonal ATRR | \$0 | BPZATRR |
| 12 CP Average Transmission System Load (MW) | 2,966 | MZTL |
| Firm Point-To-Point Transmission Service | | |
| Annual Rate / MW | \$0.0000 | BPZR |
| Monthly Rate / MW | \$0.0000 | Annual Rate / 12 |
| Weekly Rate / MW | \$0.0000 | Annual Rate / 52 |
| On Peak Day Rate / MW | \$0.0000 | Weekly Rate / 5 |
| Off Peak Day Rate / MW | \$0.0000 | Weekly Rate / 7 |
| Non-Firm Point-To-Point Transmission Service | | |
| Monthly Rate / MW | \$0.0000 | Annual Rate / 12 |
| Weekly Rate / MW | \$0.0000 | Annual Rate / 52 |
| On Peak Day Rate / MW | \$0.0000 | Monthly Rate x 12 / 260 |
| Off Peak Day Rate / MW | \$0.0000 | Monthly Rate x 12 / 365 |
| On Peak Hourly Rate / MW | \$0.0000 | Monthly Rate x 12 / 4160 |
| Off Peak Hourly Rate / MW | \$0.0000 | Monthly Rate x 12 / 8760 |

Southwest Power Pool, Inc.

Calculation of Rates for Point-To-Point Transmission Service

KCP&L Greater Missouri Operations Company Zone

PROVIDED TO SPP BY THE TRANSMISSION OWNER's FORMULA RATE TEMPLATE

| | | | |
|----------|---|-------------------|---------------------|
| Line No. | | | |
| 1 | KCPL-GMO Revenues | | \$32,491,335 |
| 2 | KCPL-GMO Zone SPP Average 12-Mo. Peak Demand MW | | 1441.5 |
| 3 | Firm Yearly Point-to-Point Rate in \$/MW - Year | (Line 1 / Line 2) | \$22,539.948 |
| 4 | Firm and Non-Firm Monthly Point-to-Point Rate in \$/MW - Month | (Line 3 / 12) | \$1,878.329 |
| 5 | Firm and Non-Firm Weekly Point-to-Point Rate in \$/MW - Weekly | (Line 3 / 52) | \$433.461 |
| 6 | Firm and Non-Firm Daily On-Peak Point-to-Point Rate in \$/MW - Day | (Line 3 / 260) | \$86.692 |
| 7 | Firm and Non-Firm Daily Off-Peak Point-to-Point Rate in \$/MW - Day | (Line 3 / 365) | \$61.753 |
| 8 | Firm Hourly On-Peak Point-to-Point Rate in \$/MW - Hour | (Line 3 / 4160) | \$5.418 |
| 9 | Firm Hourly Off-Peak Point-to-Point Rate in \$/MW - Hour | (Line 3 / 8760) | \$2.573 |

Southwest Power Pool, Inc.

**Calculation of Base Plan Point-To-Point Rates
Zonal Point-To-Point Rate**

KCP&L Greater Missouri Operations Company Zone

| <u>Description</u> | <u>Amount</u> | <u>Notes</u> |
|---|---------------|--------------------------|
| Base Plan Zonal ATRR | \$0 | BPZATRR |
| 12 CP Average Transmission System Load (MW) | 1,493 | MZTL |
| Firm Point-To-Point Transmission Service | | |
| Annual Rate / MW | \$0.0000 | BPZR |
| Monthly Rate / MW | \$0.0000 | Annual Rate / 12 |
| Weekly Rate / MW | \$0.0000 | Annual Rate / 52 |
| On Peak Day Rate / MW | \$0.0000 | Weekly Rate / 5 |
| Off Peak Day Rate / MW | \$0.0000 | Weekly Rate / 7 |
| Non-Firm Point-To-Point Transmission Service | | |
| Monthly Rate / MW | \$0.0000 | Annual Rate / 12 |
| Weekly Rate / MW | \$0.0000 | Annual Rate / 52 |
| On Peak Day Rate / MW | \$0.0000 | Monthly Rate x 12 / 260 |
| Off Peak Day Rate / MW | \$0.0000 | Monthly Rate x 12 / 365 |
| On Peak Hourly Rate / MW | \$0.0000 | Monthly Rate x 12 / 4160 |
| Off Peak Hourly Rate / MW | \$0.0000 | Monthly Rate x 12 / 8760 |

Southwest Power Pool, Inc.
Calculation of Rates for Point-To-Point Transmission Service

Westar Energy, Inc. Zone

| Line No. | | <u>Westar</u> | <u>Prairie Wind</u> | <u>KPP</u> | <u>Total</u> |
|----------|---|---------------|---------------------|------------|---------------|
| 1 | SPP ZONAL REVENUE REQUIREMENT | \$152,776,126 | \$0 | \$326,715 | \$153,102,841 |
| | DIVISOR | | | | |
| 2 | KW per year | 3,993,250 | 3,993,250 | 4,199,167 | |
| | RATES | | | | |
| 3 | Firm Annual Cost (\$/kW/Yr) (line 1 / line 2) | \$38,259 | \$ - | \$ 0.078 | \$38,336 |
| 4 | Firm and Non-Firm Monthly P-to-P Rate (\$/kW/Mo) (line 3 / 12 months) | \$3.188 | \$ - | \$ 0.006 | \$3.195 |
| | | Peak Rate | | | |
| 5 | Firm and Non-Firm Weekly P-to-P Rate (\$/kW/Wk) (Peak: line 3 / 52 weeks) | \$0.736 | \$0.000 | \$0.001 | \$0.737 |
| 6 | Firm and Non-Firm Daily P-to-P Rate (\$/kW/Day) (Peak: line 5 / 5 days) | \$0.147 | \$0.000 | \$0.000 | \$0.147 |
| 7 | Non-Firm Hourly P-to-P Rate (\$/MWh) (Peak: (line 6 / 16 hours) times 1000) | \$9.197 | \$0.000 | \$0.019 | \$9.215 |
| | | Off-Peak Rate | | | |
| 8 | Firm and Non-Firm Weekly P-to-P Rate (\$/kW/Wk) (Off Peak: line 3 / 52 weeks) | \$0.736 | \$0.000 | \$0.001 | \$0.737 |
| 9 | Firm and Non-Firm Daily P-to-P Rate (\$/kW/Day) (Off Peak: line 5 / 7 days) | \$0.105 | \$0.000 | \$0.000 | \$0.105 |
| 10 | Non-Firm Hourly P-to-P Rate (\$/MWh) (Off Peak: (line 6 / 24 hours) times 1000) | \$4.379 | \$0.000 | \$0.009 | \$4.388 |

Southwest Power Pool, Inc.

Calculation of Base Plan Point-To-Point Rates
Zonal Point-To-Point Rate

Westar Energy, Inc. Zone

| <u>Description</u> | <u>Amount</u> | <u>Notes</u> |
|--|---------------|--------------------------|
| Base Plan Zonal ATRR | \$56,961,612 | BPZATRR |
| 12 CP Average Transmission System Load (MW) | 4,043 | MZTL |
| Firm Point-To-Point Transmission Service | | |
| Annual Rate / MW | \$14,087.7854 | BPZR |
| Monthly Rate / MW | \$1,173.9821 | Annual Rate / 12 |
| Weekly Rate / MW | \$270.9190 | Annual Rate / 52 |
| On Peak Day Rate / MW | \$54.1838 | Weekly Rate / 5 |
| Off Peak Day Rate / MW | \$38.7027 | Weekly Rate / 7 |
| Non-Firm Point-To-Point Transmission Service | | |
| Monthly Rate / MW | \$1,173.9821 | Annual Rate / 12 |
| Weekly Rate / MW | \$270.9190 | Annual Rate / 52 |
| On Peak Day Rate / MW | \$54.1838 | Monthly Rate x 12 / 260 |
| Off Peak Day Rate / MW | \$38.5967 | Monthly Rate x 12 / 365 |
| On Peak Hourly Rate / MW | \$3.3865 | Monthly Rate x 12 / 4160 |
| Off Peak Hourly Rate / MW | \$1.6082 | Monthly Rate x 12 / 8760 |

Verification of Response

**Kansas City Power & Light Company
AND
KCP&L Greater Missouri Operations**

Docket No. EM-2017-0226

The response to Data Request # 2-1 is true and accurate to the best of my knowledge and belief.

Signed: _____

Date: March 28, 2017

Missouri Joint Municipal Electric Utility Commission
MJMEUC Data Request 2 to Applicant

Request No: 2-2

Company Names: GREAT PLAINS ENERGY, INC., KANSAS CITY
POWER & LIGHT COMPANY, KCP&L GREATER
MISSOURI OPERATIONS COMPANY, and WESTAR
ENERGY, INC

Case No.: EM-2017-0226

Request Date: March 23, 2017

Due Date: March 28, 2017

RE: In the Matter of Great Plains Energy Incorporated for Approval of its Acquisition of
Westar Energy, Inc.

Please Provide the Following:

2. Please verify whether the following Iatan 2 ownership percentages are correct: Kansas City Power & Light, 54.71 percent; KCP&L Greater Missouri Operations, Inc., 18 percent; Empire District Electric, 12 percent; Missouri Joint Municipal Electric Utility Commission (MJMEUC), 11.76 percent; and Kansas Electric Power Cooperative (KEPCO), 3.53 percent. If not correct, please provide the correct information.
 - a. Please verify that each of the co-owners of Iatan 2 is responsible for paying its proportionate share of the Iatan 2 operating costs.
 - b. If the operating costs of Iatan 2 were to increase, would each of the co-owners be responsible for their proportionate share of those increased operating costs?

RESPONSE:

Response Provided by: _____

KCPL and KCPL GMO
Case Name: Application for Approval of Transaction
Case Number: EM-2017-0226

Response to Jarrett Terry Interrogatories - MJMEUC_20160323
Date of Response: 3/28/2017

Question:2/2/2017

Please verify whether the following Iatan 2 ownership percentages are correct: Kansas City Power & Light, 54.71 percent; KCP&L Greater Missouri Operations, Inc., 18 percent; Empire District Electric, 12 percent; Missouri Joint Municipal Electric Utility Commission (MJMEUC), 11.76 percent; and Kansas Electric Power Cooperative (KEPCO), 3.53 percent. If not correct, please provide the correct information.

- a. Please verify that each of the co-owners of Iatan 2 is responsible for paying its proportionate share of the Iatan 2 operating costs.
- b. If the operating costs of Iatan 2 were to increase, would each of the co-owners be responsible for their proportionate share of those increased operating costs?

Response:

The "Iatan Unit 2 and Common Facilities Ownership Agreement" dated May 19, 2006. Article 2.1 lists the ownership percentages for each of five owners. The percentages listed in the question above match the Agreement.

- a. Yes, each of the co-owners as identified above are responsible for paying their proportionate share of Iatan-2 Operating costs.
- b. Yes, there are no exclusions or caps on operating expenses referenced in the Iatan-2 Operating Agreement Dated May 18, 2006.

Information Provided By:

Laura Becker, Manager, Resource Planning

Attachment: Q2-2_Verification.pdf

Verification of Response

**Kansas City Power & Light Company
AND
KCP&L Greater Missouri Operations**

Docket No. EM-2017-0226

The response to Data Request # 2-2 is true and accurate to the best of my knowledge and belief.

Signed: 

Date: March 28, 2017

Missouri Joint Municipal Electric Utility Commission
MJMEUC Data Request 2 to Joint Applicants

Request No: 2-3

Company Names: GREAT PLAINS ENERGY, INC., KANSAS CITY
POWER & LIGHT COMPANY, KCP&L GREATER
MISSOURI OPERATIONS COMPANY, and WESTAR
ENERGY, INC

Case No.: EM-2017-0226

Request Date: March 23, 2017

Due Date: March 28, 2017

RE: In the Matter of Great Plains Energy Incorporated for Approval of its Acquisition of
Westar Energy, Inc.

Please Provide the Following:

3. Please identify the Applicant's witness or witnesses that will be available at the evidentiary hearing to authenticate the Applicant's answers to MJMEUC's Data Requests relating to SPP Transmission Pricing Zones and Iatan 2 operating costs.

RESPONSE:

Response Provided by: _____

KCPL and KCPL GMO
Case Name: Application for Approval of Transaction
Case Number: EM-2017-0226

Response to Jarrett Terry Interrogatories - MJMEUC_20160323
Date of Response: 3/28/2017

Question:2/3/2017

Please identify the Applicant's witness or witnesses that will be available at the evidentiary hearing to authenticate the Applicant's answers to MJMEUC's Data Requests relating to SPP Transmission Pricing Zones and Iatan 2 operating costs.

Response:

Darrin Ives


Attachment: Q2-3_Verification.pdf

Verification of Response

**Kansas City Power & Light Company
AND
KCP&L Greater Missouri Operations**

Docket No. EM-2017-0226

The response to Data Request # 2-3 is true and accurate to the best of my knowledge and belief.

Signed: 
Date: March 28, 2017

Missouri Joint Municipal Electric Utility Commission
MJMEUC Data Request 2 to Applicant

Request No: 2-4

Company Names: GREAT PLAINS ENERGY, INC., KANSAS CITY
POWER & LIGHT COMPANY, KCP&L GREATER
MISSOURI OPERATIONS COMPANY, and WESTAR
ENERGY, INC

Case No.: EM-2017-0226

Request Date: March 23, 2017

Due Date: March 28, 2017

RE: In the Matter of Great Plains Energy Incorporated for Approval of its Acquisition of
Westar Energy, Inc.

Please Provide the Following:

4. Would the Applicant be willing to agree that as a condition to approval of the merger, it would not initiate, nor would it support, any effort to combine the Westar, KCP&L, and KCP&L SPP Transmission Pricing Zones for 10 years?

RESPONSE:

Response Provided by: _____

KCPL and KCPL GMO
Case Name: Application for Approval of Transaction
Case Number: EM-2017-0226

Response to Jarrett Terry Interrogatories - MJMEUC_20160323
Date of Response: 3/28/2017

Question:2/4/2017

Would the Applicant be willing to agree that as a condition to approval of the merger, it would not initiate, nor would it support, any effort to combine the Westar, KCP&L, and KCP&L SPP Transmission Pricing Zones for 10 years?

Response:

Although there are no current plans to combine Westar, KCP&L and GMO SPP transmission zones, there may be good reason to do so in the future. The MoPSC is not the proper forum to request combination of SPP transmission zones, which would need FERC approval. If a request to combine Westar, KCP&L and GMO SPP transmission zones is made to FERC, there would be an opportunity for MJMEUC to state its position on the matter to FERC. Note that the KCP&L and GMO SPP transmission zones have not been combined (and FERC approval for such combination has not been requested) and GPE has operated GMO together with KCP&L since July 2008. No.

Attachment: Q2-4__Verification.pdf

Verification of Response

**Kansas City Power & Light Company
AND
KCP&L Greater Missouri Operations**

Docket No. EM-2017-0226

The response to Data Request # 2-4 is true and accurate to the best of my knowledge and belief.

Signed: 

Date: March 28, 2017

Missouri Joint Municipal Electric Utility Commission
MJMEUC Data Request 2 to Applicant

Request No: 2-5

Company Names: GREAT PLAINS ENERGY, INC., KANSAS CITY
POWER & LIGHT COMPANY, KCP&L GREATER
MISSOURI OPERATIONS COMPANY, and WESTAR
ENERGY, INC

Case No.: EM-2017-0226

Request Date: March 23, 2017

Due Date: March 28, 2017

RE: In the Matter of Great Plains Energy Incorporated for Approval of its Acquisition of
Westar Energy, Inc.

Please Provide the Following:

5. Would the Applicant be willing to agree that as a condition to approval of the merger, it would not pass along any increased operating costs of Iatan 2 that might occur as a result of the merger to any other co-owners for 10 years?

RESPONSE:

Response Provided by: _____

KCPL and KCPL GMO
Case Name: Application for Approval of Transaction
Case Number: EM-2017-0226

Response to Jarrett Terry Interrogatories - MJMEUC_20160323
Date of Response: 3/28/2017

Question:2/5/2017

Would the Applicant be willing to agree that as a condition to approval of the merger, it would not pass along any increased operating costs of Iatan 2 that might occur as a result of the merger to any other co-owners for 10 years?

Response:

Operating costs of Iatan 2 will not increase as a result of the merger. Operating costs of Iatan 2 are governed by contract. The MoPSC has no jurisdiction or authority to order a change regarding this Iatan 2 contractual matter. No.

Attachment: Q2-5_Verification.pdf

Verification of Response

Kansas City Power & Light Company AND KCP&L Greater Missouri Operations

Docket No. EM-2017-0226

The response to Data Request # 2-5 is true and accurate to the best of my knowledge and belief.

Signed: _____



Date: _____

March 28, 2017