BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Joint Application of Great Plains Energy Incorporated, Kansas City Power & Light Company, and Aquila, Inc., for Approval of the Merger of Aquila, Inc., with a Subsidiary of Great Plains Energy Incorporated and for Other Related Relief.	)))))	**Case No. EM-2007-0374**

DOGWOOD ENERGY, LLC'S POSTHEARING BRIEF

COMES NOW Dogwood Energy, LLC ("Dogwood") pursuant to Commission Order and for its Posthearing Brief states to the Commission:

As the Commission is aware, Dogwood and other parties submitted prehearing briefs in this matter many months ago regarding the issues raised in this proceeding. In its prehearing brief, Dogwood specifically addressed the two issues which it has raised in this case, namely its proposal to impose conditions upon any approval of the proposed merger regarding RTO membership and Balancing Authority area consolidation. By agreement of the parties, no hearing time was devoted to these particular issues, with all cross-examination being waived. Accordingly, there is no new evidence to address at this time regarding the issues presented by Dogwood.

The only change pertinent to the issues raised by Dogwood concerns the relative timing of proceedings. When this case was originally set to be heard in December 2007, it appeared likely that this case would be resolved before the Commission made a decision in Case No. EO-2008-0046 regarding Aquila's application to sever its existing relationship with the Southwest Power Pool RTO and join the Midwest ISO instead. But due to delays in this case, the order of proceedings has been reversed. Briefs have been submitted in Case No. EO-2008-0046 and that matter is ready for resolution by the Commission prior to issuance of a decision herein.

Dogwood opposes Aquila's application in Case No. EO-2008-0046. Dogwood urges the Commission to deny that application before it issues its Report and Order in this merger case. Further, Dogwood continues to support the imposition of its proposed conditions on any approval of the proposed merger, so that Aquila and KCPL will both operate under the auspices of the SPP RTO and have consolidated Balancing Authority areas. A combination of a denial of Aquila's application in EO-2008-0046 and approval of the merger conditioned upon SPP membership should forestall appeal and put an end to Aquila's ill-advised commitment to pursue MISO membership.

Because the only pertinent new development is the change in sequence of the cases, and in the absence of new evidence since Dogwood filed its Prehearing Brief, Dogwood will not burden the Commission with further briefing. However, for purposes of convenient access, Dogwood reiterates its prior brief herein, as follows:

Introduction

In this proceeding, Dogwood only advances positions on Issues 3 and 4 under Section VIII (Transmission and RTO/ISO Criteria) of the List of Issues. Through the testimony of Robert Janssen, Dogwood recommends that the Commission condition approval of the proposed acquisition of Aquila, Inc. by Great Plains Energy ("GPE") and resulting combination of operations of Aquila and KCPL by requiring Aquila to join the

Southwest Power Pool ("SPP") with KCPL and requiring Aquila and KCPL to consolidate their Balancing Authority ("BA") areas.[1] (Janssen Rebuttal, Ex. 700, p. 3).

Statement of Position

3. Should Commission approval of the Joint Application be conditioned upon Aquila being required to join and operate its generation and transmission facilities under the auspices of the Southwest Power Pool (SPP) Regional Transmission Organization (RTO) with KCPL within four (4) months of approval of the merger?

Yes, the Commission should condition approval of the Joint Application upon Aquila being required to join and operate its generation and transmission facilities under the auspices of the SPP RTO with KCPL within four months of approval of the merger. The application for approval of the merger presents the Commission with a unique opportunity to protect the public interest by making certain that Aquila joins KCPL in the SPP to maximize the efficiency of the combined operations of the two entities.

4. Should Commission approval of the Joint Application be conditioned upon Aquila and KCPL being required to consolidate their balancing authority areas within six (6) months of approval of the merger?

Yes, the Commission should condition approval of the Joint Application upon Aquila and KCPL being required to consolidate their balancing authority areas within six months of approval of the merger. The application for approval of the merger presents the Commission with a unique opportunity to protect the public interest by making certain that Aquila and KCPL maximize the efficiency of their combined operations by consolidating balancing authority areas.

Brief

Timing can be everything. Dogwood submits that this proceeding provides the Commission with a unique opportunity to make certain that Aquila becomes a member of the SPP and that Aquila and KCPL consolidate their balancing authority areas. The applicants need the Commission to rule favorably on the proposed merger. The

[1] The term "Balancing Authority" refers to an entity, such as a utility or an RTO, that is responsible for maintaining a balance between loads and resources within a particular area. Specifically, this entity integrates resource plans ahead of time, maintains load-interchange-generation balance within an area defined by metered boundaries, and supports interconnection frequency in real-time. (Janssen Rebuttal, Ex. 700, p. 3).

Commission should not grant such relief without ensuring that the public interest is protected by means of maximized efficiency of the combined operations of the two entities. Joint membership in the SPP RTO and consolidated balancing authority areas will substantially contribute to such maximized efficiency. The Commission should be concerned about the reluctance of the involved entities to immediately pursue such significant efficiencies, and should have even greater concern about Aquila’s pending application to move in the wrong direction by joining the MISO RTO. This proceeding provides the Commission with the opportunity to eliminate such obstacles to efficient operations.

In support of its positions in this proceeding, Dogwood presents the expert testimony of Robert Janssen, Vice President for Kelson Energy Inc. ("Kelson") and President of Redbud Energy, L.P. Kelson is a power generation holding company that wholly owns Dogwood and the Dogwood 600 MW combined cycle generating facility located in Aquila’s Missouri Public Service (“MPS”) service territory. Redbud Energy consists of a 1,200 MW generating facility wholly owned by Kelson and located in Oklahoma. (Janssen Rebuttal, Ex. 700, p. 1).

Mr. Janssen’s experience includes: (a) development and management of generating facilities, (b) analysis of electricity markets and transmission systems, (c) analysis of, and development of testimony regarding, utility rates and other filings before federal and state regulatory commissions, (d) due diligence analysis of power purchase agreements and fuel contracts, (e) financial analysis of utility and independent power producer assets such as power plants and water supply systems, and (f) monitoring and reviewing the results of power supply Requests for Proposals. His responsibilities include, among other things, the operations of the Redbud Energy generating facility, representing Kelson and its subsidiaries at the Southwest Power Pool ("SPP") Regional Transmission Organization ("RTO"), state and federal regulatory affairs, power market development, and North American Electric Reliability Corporation ("NERC") compliance for approximately 4,000 MW of Kelson's generating capacity within the United States, including Dogwood's Missouri facility. This includes coordinating Dogwood's potential future participation in electricity markets in SPP. He has submitted written testimony in eight prior proceedings before the Federal Energy Regulatory Commission, the Louisiana Public Service Commission, the Oklahoma Corporation Commission, the Public Service Commission of Wisconsin, the City Council of New Orleans, and the Public Utility Commission of Texas. (Janssen Rebuttal, Ex. 700, p. 2-3).

Mr. Janssen explains that Aquila and KCP&L are potential customers of Dogwood's generating capacity. He testifies that Dogwood's ability to serve both companies' future generation supply needs will be enhanced if their BAs are consolidated, to the benefit of the customers of both utilities. Further, he describes how Dogwood's generating facility will "move" with Aquila's transmission facilities into whichever RTO Aquila ultimately joins, aligning Dogwood's interests with those of Aquila and its customers in ensuring robust access to both transmission and power supplies in the region. Finally, he shows that as a potential transmission customer of Aquila, Dogwood benefits – along with the public - from Aquila's transmission facilities being operated in the most efficient manner possible under a consolidation with KCP&L in the SPP RTO. (Janssen Rebuttal, Ex. 700, p. 4).

3. Should Commission approval of the Joint Application be conditioned upon Aquila being required to join and operate its generation and transmission facilities

under the auspices of the Southwest Power Pool (SPP) Regional Transmission Organization (RTO) with KCPL within four (4) months of approval of the merger?

Yes, the Commission should condition approval of the Joint Application upon Aquila being required to join and operate its generation and transmission facilities under the auspices of the SPP RTO with KCPL within four months of approval of the merger. The application for approval of the merger presents the Commission with a unique opportunity to protect the public interest by making certain that Aquila joins KCPL in the SPP to maximize the efficiency of the combined operations of the two entities.

GPE/KCPL witness Richard Spring describes how RTOs facilitate open and non-discriminatory electric transmission access and pricing, with regional open access tariffs, planning, and coordinated reliability operations. (Spring Direct, Ex. 24, p. 7-9; Janssen Rebuttal, Ex. 700, p. 4). Regarding regional transmission expansion planning, KCPL provided the following additional information in response to Dogwood Data Request 2-14:

> KCPL is a SPP RTO member and SPP currently performs the Planning Coordinator function for KCPL on a regional basis. KCPL participates in the SPP regional planning process which includes an annual transmission reliability assessment of the SPP RTO footprint. The SPP Transmission Expansion Plan (STEP) analyzes the transmission system for compliance with NERC Reliability Standards and SPP Criteria. Where standard or criteria violations exist, SPP and Transmission Owners (i.e. KCPL) work together to develop mitigation plans that eliminate problems. These mitigation plans may include new or upgraded transmission facilities. The STEP also performs a screening analysis of potential economic transmission projects. These assessments do not study individual control area transfer capability but rather projects that may improve transmission congestion across the SPP footprint. These projects are ranked based on a cost/benefit analysis of generation dispatch cost savings compared to the cost of the potential project. These projects are typically bulk transmission projects (345kV and above) not required by standards or criteria that cross multiple control areas and/or states and would require project sponsors to actually agree to fund and construct.

> As part of the planning process, SPP also performs an Aggregate Study three times per year that collectively analyzes specific transmission service requests, including service associated with generation interconnection requests, across the SPP footprint. These service reservations are modeled based on control area to control area transfers. The transmission system is assessed with these potential service requests and, where needed, transmission improvements are identified that would enable the service to occur without standard or criteria violations. Once the customer that has made the service request agrees to the conditions of the system improvement the project is included in the STEP.

(Janssen Rebuttal, Ex. 700, p. 4-5).

Currently, KCP&L is a member of the SPP and has turned over functional control of its transmission facilities to SPP (as described above), whereas Aquila is a conditional member of the Midwest Independent Transmission System Operator (MISO), whereby "MISO provides specified transmission security and reliability coordination functions for Aquila." (Spring Direct, Ex. 24, p. 7, 9, Spring Surrebuttal, Ex. 25, p. 1-2; Janssen Rebuttal, Ex. 700, p. 5). However, according to Aquila's response to Dogwood Data Request 2-11, "Aquila is in the transmission footprint of SPP and all point to point service requests are processed through SPP." (Janssen Rebuttal, Ex. 700, p. 6). Mr. Spring testifies that "SPP provides Aquila with regional transmission tariff administration, available transmission capacity ('ATC'), total transmission capacity ('TTC'), and other regional planning functions." (Spring Surrebuttal, Ex. 25, p. 2).

There is conflicting information available about the plan for combined KCP&L and Aquila operations regarding RTO participation. On the one hand, Mr. Spring seems to testify that there is a strong desire to operate the combined entities in a single RTO. He describes the "proposed action plans for combining the Aquila transmission operations and facilities into KCPL once the merger is completed", including that both entities will be run out of a single transmission control center. (Spring Direct, Ex. 25, p. 6). He also testifies that "there are significant benefits for operating the resulting combined organization within a single RTO structure." (Spring Direct, Ex. 25, p. 9). Mr. Spring lists various benefits that KCP&L would expect to realize from a single RTO membership, including:

- avoidance of transmission seam issues, with reduced flowgates, simplified management of transmission capacity, and increased flexibility of power transactions;
- reduced costs to support activities in governance, market development, transmission planning and expansion, reliability standards development, and tariff administration;
- savings related to participation in a single regional transmission tariff, with simplified administration and minimized proceedings with FERC;
- maintenance of consistency across both companies, coordinated transmission cost sharing, lower administrative costs, and more congruent investment structures;
- facilitation of consistent retail rate structures;
- more effective transmission planning and expansion and avoidance of inefficient, redundant or even conflicting solutions; and
- ensured consistent development and adherence to bulk power reliability standards and criteria. (Spring Direct, Ex. 25, p. 10-11).[2]

GPE/KCPL witness John Marshall touts combined RTO membership as an aspect of transmission synergy in support of the proposed merger. (Marshall Supplemental Direct,

[2] KCPL has not yet quantified these benefits of single RTO participation. (Janssen Rebuttal, Ex. 700, p. 7).

Ex. 21, p. 13). Further, GPE/KCPL witness Dana Crawford testifies that the companies will not realize the additional savings that would result from joint dispatching of KCPL and Aquila generating resources unless Aquila joins the SPP with KCPL. (Crawford Direct, Ex. 11, p. 5-6).

On the other hand, Mr. Spring acknowledges that there is a “potential of KCPL and Aquila having membership in separate RTOs.” (Spring Direct, Ex. 24, p. 9). Further, in Case No. EO-2008-0046, Aquila has applied to the Commission for authority to transfer operational control of transmission assets to MISO. (Spring Surrebuttal, Ex. 25, p. 2). Dogwood has requested that the Commission take notice of the proceedings in EO-2008-0046 in this case. A copy of the Application from that case (without appendices) is attached to Mr. Janssen’s Rebuttal testimony as Schedule RJ2. A copy of the Direct Testimony of Dennis Odell submitted by Aquila in that case (without attachments) is attached to Mr. Janssen’s Rebuttal as Schedule RJ3. (Janssen Rebuttal, Ex. 700, p. 8).

The picture is also murky in terms of how KCPL and Aquila propose to resolve the issue of appropriate RTO membership. Mr. Spring indicates a desire by KCPL to evaluate the strategy of RTO membership when the merger is completed. (Spring Direct, Ex. 24, p. 9). Witness Marshall makes the same statement. (Marshall Direct, Ex. 20, p. 7). However, as indicated above, Aquila has actively petitioned the Commission to authorize it to join MISO, which would seem to effectively preclude any post-merger evaluation, at least for a significant period of time. Mr. Janssen opines that it is not a simple matter for a company to jump in and out of RTO membership even within a matter of years. Also, the information contained in Schedules RJ2 and RJ3 demonstrates that there would be contractual limitations on the timing of an exit from an RTO. (Janssen Rebuttal, Ex. 700, p. 8).

Dogwood submits that the Commission should require Aquila to join the SPP RTO with KCPL as soon as practicable. (Janssen Rebuttal, Ex. 700, p. 9). Specifically, Dogwood recommends that Aquila should be required to join and operate its generation and transmission facilities under the auspices of the SPP RTO with KCPL within four months after approval of the merger[3].

It is not disputed that Aquila needs to join an RTO. In light of the significant benefits (as described above) that would attend membership in a single RTO by Aquila and KCPL, and in light of KCPL's established membership in SPP, the Commission should require Aquila to join SPP. As described below, the net financial benefits of Aquila joining the SPP are substantially higher than any benefits of it joining MISO (even before the benefits of a merged entity with a single RTO membership are considered). (Janssen Rebuttal, Ex. 700, p. 9).

Aquila seems to have applied for authority to join MISO to fulfill what have become stale commitments rather than to address the public interests at stake in the new opportunities presented by the merger application. In its application in Case No. EO-2008-0046, Aquila describes how it agreed to join MISO in 2001 in connection with a merger application to FERC, when MISO was the only approved RTO in existence accessible to Aquila. Aquila also describes how it withdrew pending applications to join

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[3] The standard EIS Market registration timeframe for new participants is four to six months after submission of registration materials to the SPP. However, it is possible that Aquila's participation could be accommodated more quickly since its information is already included in SPP's Energy Management System and planning models. (Janssen Rebuttal, Ex. 700, p. 14).

MISO. In its Application, Aquila describes additional starts and stops in its process of attempting to join MISO, including dismissal of a pending application by this Commission to allow for completion of comparative cost/benefit studies regarding joining SPP versus MISO. (Janssen Rebuttal, Ex. 700, p. 9-10).

With its application in Case No. EO-2008-0046, Aquila submitted a copy of the comparative cost/benefit analysis as Appendix G. A copy is attached to Mr. Janssen's Rebuttal Testimony in this case as Schedule RJ4. The study demonstrates that there would be a $66 million (or four times) greater benefit for Aquila to join SPP (again, even before considering the benefits of a merged entity being in a single RTO). The study describes in detail how those greater benefits flow from Aquila's greater involvement and connection with SPP. (Janssen Rebuttal, Ex. 700, p. 10).

For the foregoing reasons, Dogwood has intervened in Case No. EO-2008-0046 to oppose Aquila's request in that case for authority to transfer operational control of transmission assets to MISO. (Janssen Rebuttal, Ex. 700, p. 11). Mr. Spring suggests that the Commission put off addressing Aquila's RTO membership until completion of the proceedings in Case No. EO-2008-0046. (Spring Surrebuttal, Ex. 25, p. 2-3). But the application in that case does not even request that the Commission consider more beneficial SPP membership as an alternative. (Janssen Rebuttal, Ex. 700, Schedule RJ2).

The Commission is not constrained by any prior commitment that Aquila may have made to MISO and should require Aquila to join the SPP now in light of all the benefits that would flow from such membership. Furthermore, RTO membership is too important to leave unresolved in this merger proceeding as the applicants propose. (Janssen Rebuttal, Ex. 700, p. 11).

Given Aquila's apparent blind determination to pursue stale commitments to MISO, without regard to the superior opportunity presented by SPP, the Commission should take advantage of the opportunity presented by the merger application and protect the public interest by making it a condition of approval of that transaction that Aquila joins SPP.[4]

4. Should Commission approval of the Joint Application be conditioned upon Aquila and KCPL being required to consolidate their balancing authority areas within six (6) months of approval of the merger?

Yes, the Commission should condition approval of the Joint Application upon Aquila and KCPL being required to consolidate their balancing authority areas within six months of approval of the merger. The application for approval of the merger presents the Commission with a unique opportunity to protect the public interest by making certain that Aquila and KCPL maximize the efficiency of their combined operations by consolidating balancing authority areas.

The Commission should require Aquila and KCPL to promptly begin operating out of a combined balancing authority as soon as practicable after the merger. GPE/KCPL witness Marshall testifies that if the two companies "align operations in a single control area, there are likely to be numerous benefits in areas such as load following, outage planning, and spinning reserves." (Marshall Supplemental Direct, Ex. 21, p. 6). Mr. Spring agrees. (Spring Surrebuttal, Ex. 25, p. 6). Mr. Marshall indicates that Energy Resource Management savings will be realized when "the combined companies are able to operate from a single control area." (Marshall Supplemental Direct, Ex. 21, p.

[4] The Missouri Joint Municipal Electric Utility Commission provides additional evidence demonstrating that the PSC should require Aquila to join SPP in conjunction with merger approval. (Grotzinger Cross-surrebuttal, Ex. 800, p. 5-8). Witnesses for the City of Independence also call for the PSC to address RTO membership prior to approving the merger. (Mahlberg Rebuttal, Ex. 1300; Volpe Rebuttal, Ex. 1305).

18). KCPL elaborates on this point in the response to Dogwood Data Request 2-21, as follows:

> A portion of the ERM synergies are planned to be realized on day one. These are mainly in the back office functions of power sales accounting, in the Energy Resource Management analysis area and in the fuels areas where there is modest redundancy. Additional savings are possible with consolidation of control area operations.[5] Consolidation would eliminate redundant functions such as the need for two sets of control operators. To the extent the companies can consolidate control area operations, benefits could be gained without SPP control area consolidation. There is currently a significant amount of uncertainty surrounding Aquila's RTO participation. It is uncertain when or even what RTO Aquila will ultimately participate in. There is also significant uncertainty surrounding the design and timing of future phases of the SPP market structure. Discussions are currently underway with SPP and their membership to consolidate control areas under the SPP. Timing of this is also uncertain. KCP&L anticipates that in 2010 SPP may evolve into a fully functional RTO. If the SPP market evolves sooner than this, possibly in late 2009, the benefits may be able to be recognized sooner.

As GPE/KCPL witness Crawford testifies, combining control area operations (Balancing Authority area operations) is necessary to achieve the savings associated with joint dispatching of generating resources.[6] (Crawford Direct, Ex. 11, p. 5-6). In response to Dogwood Data Request 2-5, KCP&L explains that:

> In theory, control area consolidation would reduce the amount of regulating capacity needed to maintain NERC control performance standards. This would reduce the cost of regulation. Potential benefits from reduced regulating capacity needs have not been quantified.

The Commission should ensure that the benefits of BA consolidation will be realized in connection with the merger. (Janssen Rebuttal, Ex. 700, p. 11-12).

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[5] In this context, Control Area is synonymous with Balancing Authority area. The term Control Area predates NERC's recent revisions to its functional model, wherein it developed the term Balancing Authority to more precisely define certain functions associated with a Control Area. (Janssen Rebuttal, Ex. 700, p. 12).

[6] Dogwood has not been able to review cost and benefit information on this point at this time, because it has been required to review that information at applicant's premises pursuant to Dogwood Data Request 2-1. (Janssen Rebuttal, Ex. 700, p. 12).

Discussions within SPP regarding the consolidation of balancing authorities within the SPP footprint have been going on for many years, but are finally reaching fruition. During February 2005 in Docket Nos. RT01-4 and ER04-48, SPP filed a report with FERC on the potential for BA consolidation associated with the development of the Energy Imbalance Service ("EIS") Market in SPP. In that filing, SPP asserted that the benefits of consolidation would outweigh the costs, and the consolidation would be pursued after the start-up of the EIS Market.[7] Consistent with that obligation, SPP BAs are currently engaged in a discussion regarding this consolidation, and these discussions are moving forward in a positive manner and many of the SPP BAs are in favor of it. Contrary to statements by KCP&L witnesses in testimony, SPP Staff has targeted 2008 as the year for the consolidation to be completed.[8] (Janssen Rebuttal, Ex. 700, p. 13; Spring Surrebuttal, Ex. 25, p. 6).

It is not appropriate for the Commission to wait to address balancing authority area consolidation as applicants suggest. (Spring Surrebuttal, Ex. 25, p. 4, 6). The merger application presents a unique opportunity for the Commission to protect the public interest by making certain that consolidation of balancing authority areas promptly takes place.

[7] SPP successfully started up its EIS Market on February 1, 2007. This market is designed to allow all participating generating facilities within SPP to be centrally dispatched on an economic basis by SPP to serve the load following needs of the load serving entities within the SPP Market footprint. Aquila is not currently in the SPP Market footprint, and as a result, does not receive the benefits of common centralized economic generation dispatch with the rest of SPP to meet its load following needs. (Janssen Rebuttal, Ex. 700, p. 13).

[8] In a presentation from SPP Staff to its Board of Directors, SPP Staff states that the target date for BA consolidation in the SPP footprint is mid- to late-2008. (Janssen Rebuttal, Ex. 700, p. 13, Schedule RJ5).

Conclusion

In order for Aquila's and KCPL's customers to more fully receive the potential benefits of the proposed merger, and to eliminate uncertainties and risks resulting from prior commitments Aquila appears to have made to MISO, Dogwood recommends that the Commission approve the proposed merger with the following conditions (in addition to such other conditions as the Commission reasonably decides to impose based on the recommendations of other parties):

(1) Aquila should be required to join and operate its generation and transmission facilities under the auspices of the SPP RTO with KCPL within four months after approval of the merger; and

(2) Aquila and KCPL should be required to consolidate their BAs within six months of approval of the merger. The Commission should allow KCP&L and Aquila to exceed this deadline only in the event that KCP&L and Aquila provide a definite schedule and commitment to the Commission, prior to the six month post-merger deadline, for the two companies' participation in an overall consolidation of SPP BAs to be completed no later than January 1, 2009.

(Janssen Rebuttal, Ex. 700, p. 14).

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Certificate of Service

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 2nd day of June, 2008, by either placing same in the U.S. Mail, postage paid, by fax or email transmission.

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