

EXHIBIT

10

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Case No.:

FAC

Robinett/Rebuttal

Public Counsel

EO-2017-0065

FILED

September 1, 2017

Data Center

Missouri Public

Service Commission

REBUTTAL TESTIMONY

OF

JOHN A. ROBINETT

Submitted on Behalf of the Office of the Public Counsel

EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. EO-2017-0065

June 22, 2017

OPC Exhibit No. 10
Date 8-24-17 Reporter A. Fe
File No. EO-2017-0065

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


In the Matter of the Sixth Prudence)	
Review of Costs Subject to the)	
Commission-Approved Fuel Adjustment)	Case No. EO-2017-0065
Clause of The Empire District Electric)	
Company)	

AFFIDAVIT OF JOHN A. ROBINETT

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

John A. Robinett, of lawful age and being first duly sworn, deposes and states:

1. My name is John A. Robinett. I am a Utility Engineering Specialist for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

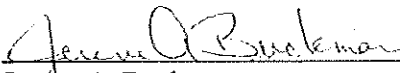


John A. Robinett
Utility Engineering Specialist

Subscribed and sworn to me this 22nd day of June 2017.



JERENE A. BUCKMAN
My Commission Expires
August 23, 2017
Cole County
Commission #13754037



Jerene A. Buckman
Notary Public

My Commission expires August 23, 2017.

**REBUTTAL TESTIMONY
OF
JOHN A. ROBINETT
THE EMPIRE DISTRICT ELECTRIC COMPANY
CASE NO. EO-2017-0065**

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

2 **A.** John A. Robinett, PO Box 2230, Jefferson City, Missouri 65102.

3 **Q.** By whom are you employed and in what capacity?

4 **A.** I am employed by the Missouri Office of the Public Counsel ("OPC") as a Utility
5 Engineering Specialist.

6 **Q.** Are you the same John A. Robinett that filed direct testimony on behalf of the OPC in
7 this proceeding?

8 **A.** Yes.

9 **Q.** What is the purpose of your rebuttal testimony?

10 **A.** My rebuttal testimony responds to the direct testimony of the Commission's Staff,
11 submitted in the form of the Staff's Report.¹ As I stated in my direct testimony, the
12 Staff's fuel adjustment clause ("FAC") review should include a review of each generating
13 unit's heat rates. The Staff's Report, which the Staff has now adopted as its direct
14 testimony, includes no explicit documented review of the Empire District Electric
15 Company's ("Empire") heat rates outside of Empire's response to Staff Data Request No.
16 0022 for monthly heat rate data of the 18 month review period. At the time I filed direct
17 testimony in this case I had not been able to finish my own review of the heat rates of
18 Empire's generating units because I had not received responses to supplemental data

¹ A. Utilization of Generation Capacity and Station Outages

4. Documents Reviewed

a) Empire's responses to Staff Data Request Nos. 0022

1 requests related to outlier efficiencies identified as calculation errors. I have now
2 completed my review.

3 **Q. Do you have a recommendation for the Commission after your review of Empire's**
4 **generation unit heat rates?**

5 A. Yes. My recommendation remains the same as in my direct testimony. OPC
6 recommends the Commission require its Staff in its FAC prudence reviews, to conduct a
7 review of each generating unit heat rates. The review should include heat rates from the
8 previous and current prudence audit periods and the heat rate test results supplied as FAC
9 minimum filing requirements in rate cases. Staff's prudence review report should include
10 a section that documents Staff's review and the findings from its review.

11 **Q. Did OPC receive responses to the supplemental data requests to Empire?**

12 A. Yes. OPC received responses to supplemental data requests asking for corrected monthly
13 heat rate data for specific units and months where Empire identified the outlier efficiencies
14 as calculation errors.

15 **Q. Was Empire able to provide actual data for all of the units and months?**

16 A. No. Empire, in response to OPC data request 8502.2, stated that weighted averages needed
17 to be used for outliers in a few instances. Empire also states:

For the units and dates listed below the Company is unable to provide actual heat rate data. The amounts previously reported should be revised to be based upon typical full load heat rates for the specific units. ...

<i>Riverton 11</i>	<i>August 2011</i>
<i>Stateline Unit 1</i>	<i>August 2009</i>
<i>Stateline Unit 1</i>	<i>October 2009²</i>

Q. Did OPC find any indications of imprudence in the historical monthly heat rate data?

A. Not at this time. While a review of heat rates will not necessarily reveal imprudence with regard to power plant maintenance, and at this point in my analysis it has not, a future dramatic change in the heat rates could indicate a change in maintenance practices that would need to be further investigated. Therefore, OPC recommends the Commission direct its Staff in its FAC prudence audits to conduct a review of each generating unit's heat rates. The review should include heat rates from the previous and current prudence audit periods and the heat rate test results supplied as FAC minimum filing requirements in rate cases. Staff's prudence review report should include a section that documents Staff's review and the findings from its review.

Q. Does this conclude your rebuttal testimony?

A. Yes, it does.

² Typical full load heat rate values for Riverton 11 and Stateline 1 omitted from data request response quotation due to their likely HC status