Exhibit No.: Issue(s):

Witness/Type of Exhibit: Sponsoring Party: Case No.: Depreciation/ Retirements/ One CIS Robinett/Direct Public Counsel ER-2018-0145 and ER-2018-0146

# **DIRECT TESTIMONY**

# OF

# JOHN A. ROBINETT

Submitted on Behalf of the Office of the Public Counsel

## KANSAS CITY POWER & LIGHT COMPANY and KCP&L GREATER MISSOURI OPERATIONS COMPANY

### Case No. ER-2018-0145 and ER-2018-0146

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Denotes Information that has been redacted

June 19, 2018



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

In the Matter of Kansas City Power &	)	
Light Company's Request for Authority	)	File No. ER-2018-0145
to Implement a General Rate Increase	)	
for Electric Service	)	
In the Matter of KCP&L Greater Missouri	)	
Operations Company's Request for	)	File No. ER-2018-0146
Authority to Implement a General	)	
Rate Increase for Electric Service	)	

) ss

)

#### AFFIDAVIT OF JOHN A. ROBINETT

### STATE OF MISSOURI

#### 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 direct 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 19th day of June 2018.



JERENE A. BUCKMAN My Commission Expires August 23, 2021 Cole County Commission #13754037

Jerene A. Buckman Notary Public

My Commission expires August 23, 2021.

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### DIRECT TESTIMONY OF JOHN A. ROBINETT KANSAS CITY POWER AND LIGHT COMPANY

### **KCP&L - GREATER MISSOURI OPERATIONS COMPANY**

### CASE Nos. ER-2018-0145 and ER-2018-0146

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\$7.2 million additional amortization related to depreciation expense for GMO created in GMO's last general electric rate case. OPC recommends a decrease in depreciation expense for KCPL related to the Montrose retirements of \$3,139,379 based on depreciation expense of true-up accounting schedules from Case No. ER-2016-0285. OPC recommends a decrease in depreciation expense for GMO related to the Sibley retirements of \$9,875,199 based on depreciation expense of direct accounting schedules from Case No. ER-2016-0285. OPC recommends that all operations and maintenance expenses for KCPL's Montrose and GMO's Sibley facilities not be included in their respective costs of service used for setting rates in these cases.

### **Coal Unit Retirements**

### Q. Have KCPL and GMO announced they are retiring coal units in 2018 and 2019?

A. Yes. Attached as Schedule JAR-D-2 is a January 20, 2015, press release from KCP&L announcing the plan to cease burning coal at three power plant locations (Montrose, Sibley, and Lake Road). Also attached as Schedule JAR-D-3 is a June 2, 2017, press release from KCP&L announcing the retirement of six units (Montrose Units 2 and 3, Sibley Units 1, 2, and 3, and Lake Road Unit 4/6) at three power plant locations. Additionally KCPL in response to OPC data request 8508 stated, "[In] the 2017 KCP&L Annual Update filed on June 1, 2017 under MPSC Case No. EO-2017-0229, it was stated that Montrose Units 2 and 3 would be retired 'by 2019.' In the 2017 GMO Annual Update file on June 1, 2017 under MPSC Case No. EO-2017-0230, it was stated that Sibley Units 2 and 3 would be retired 'by 2019' and Lake Road 4/6 retiring 'by 2020.'"

### 22 Q. Does OPC have concerns with any of these announced coal unit retirements?

A. Yes. In the last rate case ER-2016-0285, the retirement dates for Montrose units 2 and 3 were 2021. In Case No. ER-2016-0156, the Sibley 1 and 2 retirement dates were 2019; likewise, the estimated retirement of Lake Road unit 4/6 was 2020. OPC recognizes that these plants have reached the end of their useful life and is not concerned with KCP&L's announcement of their retirements at the ends of 2018 and 2019.

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However, OPC does have concerns that the premature retirement of GMO's Sibley unit 3 could be imprudent. GMO did not raise the retirement of Sibley 3 in this case. However, the implications of the announced early retirement date of December 2018 for this plant should be addressed in this case. Sibley Unit 3 provides the most energy of all of GMO's generating units. In addition, the retirement of Sibley Unit 3 creates a large depreciation reserve deficiency, since GMO's depreciation rates were set in the 2016 rate case to collect original cost plus net salvage for Sibley unit 3 over the remaining life based on GMO's estimated then retirement date of 2040. OPC expressed its concerns regarding the premature retirement of this generating unit in *Public Counsel's Suggested Special Contemporary Resource Planning Issues* in Case No. EO-2018-0045. In that filing OPC articulated its concerns as follows:

In short, if the company's modeling suggests retiring significant amounts of generation prematurely is prudent; it is likely that other SPP members' modeling will show similar results. Under that scenario, a near-term future where excess SPP reserve margins, resulting in a low cost energy market, are erased entirely appears plausible.

OPC's filing and the memo attached to that filing is contained in its entirety as Schedule JAR-D-4 to this testimony.

Why is KCP&L's announced retirement date for Sibley unit 3 a premature retirement? 19 **Q**. In Case No. ER-2009-0090, GMO was seeking recovery of Selective Catalytic Reduction 20 A. ("SCR") equipment GMO was installing on Sibley unit 3 to comply with the Clean Air 21 Interstate Rule and the Clean Air Mercury Rule. Based on my review, the depreciation 22 study performed in Case No. ER-2010-0356 did not contain data related to the SCR for 23 Sibley 3 as it was not declared to be in service until first quarter of 2009, and the study 24 only included historical data through December 31, 2008. As part of its 2010 rate case, 25 Case No. ER-2010-0356, GMO filed a depreciation study that indicated the useful life for 26 Sibley 3 was until 2030. The Depreciation study performed in Case No. ER-2016-0156 is 27 the first study to examine Sibley 3 after the SCR was in service, and in that case the life of 28 29 the unit was extended from 2030 to 2040. In this case, based on GMO's announced

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retirement date, the useful life of the unit as of the time of this testimony is a little over six months.

Q. Will GMO have adequate generation capacity after it retires Sibley units 1, 2, and 3 in December of 2018?

# A. No. Attached as Schedule JAR-D-5 is the Southwestern Power Pool ("SPP") 2017 Resource Adequacy Report published June 19, 2017. Page 28 is the Demand and Capacity report for GMO. This report shows that GMO will be deficient of the SPP target planning capacity for 2019 after the Sibley units are retired at the end of 2018.

# Q. Did the SPP make a presentation to the Commission in 2017 which indicated that GMO would not satisfy SPP's Capacity margin requirements in 2019 through 2022?

A. Yes. On August 30, 2017, MISO and SPP both gave presentation during agenda in the large hearing room. The Commission asked several question about the following slide that indicated that GMO was not projected to meet the resource adequacy requirement of SPP in 2019 through 2022:

# Final Report – June 2017

Load Responsible Entity	Met Resource Adequacy Requirement					
	2017	2018	2019	2020	2021	2022
Carthage Water & Electric Plant	NO	NO	NO	NO	NO	NC
City of Malden Board of Public Works	YES	YES	YES	YES	YES	YES
City of Poplar Bluff Municipal Utilities	YES	YES	YES	YES	YES	YES
City of West Plains Board of Public Works	YES	YES	YES	YES	YES	YES
City Utilities of Springfield	YES	YES	YES	YES	YES	YES
Empire District Electric Company	YES	YES	YES	YES	YES	YES
Greater Missouri Operations Company (KCP&L)	YES	YES	NO	NO	NO	NC
Independence Power & Light	YES	YES	YES	YES	YES	YES
Kansas City Power & Light	YES	YES	YES	YES	YES	YES
Kennett Board of Public Works	YES	YES	YES	YES	YES	YES
Missouri Joint Municipal Electric Utility Commission	YES	YES	YES	YES	YES	YE
People's Electric Cooperative	YES	YES	YES	YES	YES	YES
Westar Energy	YES	YES	YES	YES	YES	YES

OPC has transcribed the dialog related to the previous slide that occurred during the agenda presentation by SPP:

Time of transcript start: 1:35:56

Sam Loudenslager: ...Even if you've got somebody who likes like they're won't be able to meet this year's resource requirement at some point in the future I wouldn't be too concerned about it. There's plenty of time for things to get- for things to happen. For resources to be procured.

Chairman Hall: Well, could you- could you explain or give some background for KCP&L GMO in 2019, the projection is that they won't make that requirement?

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<sup>&</sup>lt;sup>1</sup> <u>https://psc.mo.gov/CMSInternetData/8-30-</u> <u>17%202017%20Resource%20Adequacy%20Process%20Final%20Report.pdf</u>

1 2	Loudenslager: No. I don't know why that is frankly, but it is – I can't tell you. I don't know.
3 4	Chairman Hall: But you're not – You would anticipate them being able to meet it?
5	Loudenslager: Oh yeah. Yeah.
6 7	Chairman Hall: Yeah I would too. So I was a little surprised to see that. I was surprised to see that.
8 9 10	Loudenslager: And I think that is all I haveOh, we will do a post-season analysis also, and this will determine whether or not there is any sort of – What would we call that thing?
11 12	Chairman Hall: You can find the name of a system report [inaudible] or a report type thing.
13 14 15 16 17 18 19 20	Loudenslager: Yeah. Anyway if there is some sort of assessment that is going to – financial assessment that will need to be made, that will show up. Basically, "here's what you told us you were going to. Here's the resources and the demand you anticipated when you submitted your workbooks to us." We published a report in June that said "Yep. This is what everybody says." In October I believe it is that is we will do an analysis and see okay how did everybody do? Did they meet what they said they were going to meet or not?
21	Unknown: I think KCP&L wants to answer your question.
22	Chairman Hall: Oh. Okay.
23	Loudenslager: Hey Denise.
24	Denise Buffington: Good morning.
25	Chairman Hall: Morning.
26 27 28	Buffington: So on behalf of KCP&L and GMO I do not know why the numbers reflect we won't meet our resource requirement in 2019, but I assure you that we have the numbers and we will meet it.
29	Chairman Hall: *laughs*
30 31	Buffington: I don't know what's in that chart. I haven't seen the numbers. But, you know, we do resource planning and submit those

1 2		requirements here at the Commission on an annual basis, and we are prepared to meet those requirements.
3		Chairman Hall: Oh. Okay. I am not nervous about it. I'll put it that way.
4		Buffington: I'm nervous about it.
5 6		Chairman Hall: Well, I was surprised with this calculation. I am not nervous about the company's ability to meet the requirement.
7		Buffington: Thank you.
8		Loudenslager: Any other questions before I move into my last
9		Chairman Hall: I guess not.
10		End of transcript: 1:38:59
11		Currently, GMO does not own enough capacity to meet its own retail load requirements.
12		For 2018, it ** ** With the retirement
13		of Sibley 3, GMO will need additional capacity beyond its 2018 capacity contract. GMO
14		has issued several capacity RFPs to get capacity commitments from other utilities in the
15		SPP market to meet the needs of its customers, at the time of this testimony OPC still has
16		pending discovery related to capacity RFPs and agreed to contracts to purchase capacity.
17	Q.	Is OPC concerned about GMO meeting its requirements?
18	A.	Yes.
10		So CMO is promotively retiging Sibley 2 and then seeking to contract for replacement
19 20	Q.	So, GMO is prematurely retiring Sibley 3 and then seeking to contract for replacement
20		capacity and energy?
21	А.	Yes and no. GMO is entering into a contract for capacity. However, it has told OPC that it
22		intends to meet the energy needs of its customers by buying energy from the SPP markets.
23	Q.	Does GMO's plan to rely on the SPP energy markets to serve its retail customers cause
24		OPC concern?

<sup>&</sup>lt;sup>2</sup> Case No. ER-2018-0146, Staff Data Request No. 0065

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A. Yes. In GMO's work papers for this rate case GMO's fuel run showed that it was purchasing energy from the SPP market to meet almost 38% of its native load's energy requirements. With the retirement of Sibley Units 1, 2, and 3, GMO will increase the percentage purchased from the SPP market focusing on reliance on the market than its own generation. This is more disconcerting in that GMO is the one electric utility in our state that has experienced increases load growth, recently it was publicly announced that a new steel facility (Nucor) is going to open in Sedalia, which is in GMO's service territory.

### Q. Why is it a problem for GMO to rely so heavily on the SPP market for energy?

A. OPC realizes that there is enough excess capacity in SPP to reliably provide sufficient energy in the SPP markets to serve GMO's customers. However, by depending on the SPP markets for energy, GMO is subjecting its customers to the fluctuations and risks of those markets.

# Q. Is GMO asking for both the costs of Sibley and the contract it is planning to use to replace Sibley 3 capacity be included in its revenue requirement used to set rates in this case?

No. It is only asking for the costs of the plant. However, any changes in GMO's energy costs 15 A. 16 will flow to GMO's customers through its Fuel Adjustment Clause ("FAC"), increasing, or decreasing, the FAC charges on their bills from what they otherwise would be. After rates are 17 effective for this case, GMO's customers, after the end of 2018, will be continuing to pay 18 depreciation expense for three units that will no longer be used or useful. In addition, when 19 the PPA agreement wind comes in-service rate payers will be asked to pay for PPA energy 20 purchases being flowed through the FAC, since they will not be included in the fuel base for 21 22 this case.

### 23 Q. What is KCPL requesting for its Montrose units that concerns OPC?

A. KCPL is seeking as part of its case continued depreciation expense for Montrose Units 2
and 3, even though it has announced plans to retire both of these units by the end of 2018.
KCPL seeks depreciation expense for these units that will be retired by the end of 2018 to
be collected in rates for up to four years during which the units will be retired and not used.
Additionally, in its rate case KCPL seeks to build in operating expense, fuel expense for

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the units to be collected over the next four years. Make no mistake, this case is aboutbeneficial regulatory lag for KCPL related to building in expenses for generating units thatKCPL has announced will be retired after the true-up period ends in its case.

#### **Q.** What is GMO requesting for its Sibley and Lake Road units that concerns OPC?

A. GMO is seeking to as part of its case continued depreciation expense for Sibley Units 1, 2, and 3, even though it has announced plans to retire the units by these end of 2018. GMO seeks to collect this depreciation expense in rates for up to four years during which the units will be retired and not used. GMO is also seeking continued depreciation expense for Lake Road unit 4/6 which it will retire by the end of 2019. GMO is seeking for that depreciation expense to be collected in rates for up to four years, three years of which the units will be retired and not be used. Additionally, in its rate case GMO seeks to build in operating and fuel expense for the units, also to be collected over the next four years. Make no mistake, this case is about beneficial regulatory lag for GMO related to building into its rates expenses for generating units that GMO has announced will be retired shortly after the end of the true-up period in its case.

#### 16 **Q.** Does OPC have other concerns with GMO retiring Sibley unit 3?

Yes. GMO decided to shut down its coal unit that, in the Staff work papers from Case No. 17 A. ER-2016-0156, produced the most energy of all of GMO's units during the test year in that 18 case. Additionally, Sibley, based on Staff's fuel run work papers from the 2016 rate case, 19 is a cheaper unit to run than its jointly-owned Jeffery units. Of its coal resources, GMO's 20 only coal units that are cheaper to run than Sibley unit 3 are Iatan units 1 and 2. Attached 21 as Schedule JAR-D-6C are confidential work papers of Staff from Case No. ER-2016-0156 22 that show the numbers of hours each unit was producing energy for the year and the cost 23 per megawatt hour to operate each generation unit during the year. 24

# Q. Are KCPL and GMO planning to replace any of the capacity from the coal units they are retiring?

A. It is my understanding that KCPL and GMO have entered into two new purchase power agreements for wind.

# Q. Should the wind PPAs be included in determining the rates that result from these rate cases?

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No. It is my understanding that the facilities related to the PPAs will not be in-service until 1 A. after the true-up period of these cases. However, customers can be charged costs for the wind PPAs through KCPL's and GMO's fuel adjustment clauses. This means that even though the PPA costs may not be considered in these current cases, KCPL and GMO will be able to recover 95% of them from their customers starting when wind facilities are in-6 service.

#### Q. Does OPC have any other concerns about the retirements of the Montrose and Sibley coal generation units?

A. Yes. As a part of the Department of Economic Development, OPC has concerns related to the loss of jobs that the retirement of the generation facilities will create. With the retirements at Montrose (KCPL) and Sibley (GMO) there will no longer be units at either site that produce power.

**KCPL Depreciation Recommendation** 13

#### Q. What is OPC's position on depreciation expense for Montrose units 2 and 3?

A. KCPL is seeking that its currently ordered depreciation rates be continued. OPC states it would be unjust and unreasonable to include continued depreciation expense for the Montrose units when determining going-forward rates given KCPL's announcement it is retiring the Montrose units at the end of 2018, six months after the end of the true-up period. Based on KCPL's application new rates will go into effect by December 29, 2018. KCPL's position would allow it to get depreciation expense built into rates for facilities it will soon retire at the Montrose location after rates become effective. Once the units are retired off KCPL's books, KCPL will then no longer be required to book depreciation expense to the depreciation reserve for those units, instead those dollars will become profit. OPC recommends that the depreciation rates for Montrose Units 2, 3, and Montrose common plant be set to zero percent as the units will no longer be used and useful by the time new rates from this case are effective.

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# Q. What is OPC's recommendation if the Commission should grant continued depreciation expense for Montrose units 2 and 3 at the current ordered depreciation rates?

A. If the Commission orders KPCL to continue to use the current ordered depreciation rates 4 5 on the Montrose units, OPC requests that the Commission order a tracker be put in place to account for the depreciation expense KCPL will no longer book after the units are retired. 6 7 Ratepayers should be given full credit for the depreciation expense KCPL is collecting in rates for retired units, units which no longer provide either energy or capacity. Senate Bill 8 564, which was signed into law on June 1, 2018, allows for plant-in-service accounting, 9 which allows for the deferral of 85% of the depreciation expense for plant placed in-service 10 in between rate cases. This was previously positive regulatory lag for utility customers; 11 however, now customers will be picking up the deferred depreciation expense and rate of 12 return over a twenty-year period. With this reduction in risk for the shareholders of the 13 utility, it is only just and reasonable that the Commission protect ratepayers. The 14 Commission should do so by tracking and then offsetting future rate base by the 15 depreciation expense that was built into rates for retired units until rates are reset in the 16 next general rate case. With this reduction in risk for the utility shareholders, it is only just 17 and reasonable that the Commission protect ratepayers by tracking and then offsetting 18 future rate base with the value that was built into rates for the depreciation expense of the 19 units that will be retired at the end of the year until rates are reset in the next general rate 20 21 case.

# Q. Has OPC estimated the magnitude of KCPL's unrecovered original cost for Montrose Units 2 and 3?

# A. Yes. OPC estimates KCPL's potential under recovery of its investment in Montrose units 2, 3, and common plant at December 31, 2018, including cost of removal, to be \$65,129,906.

Q. Does OPC recommend recovery of KCPL's estimated unrecovered original cost for
Montrose Units 2 and 3 in this case?

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A. No. The only recovery to be addressed in this case is the remaining depreciation expense until the units are retired by end of 2018. Based on KCPL's application, OPC recommends setting the depreciation rates to zero percent for all of the Montrose accounts, as the units will be retired by the effective date of new rates in this case.

### Q. Is OPC aware of anything that may change its position on this matter?

A. Yes. OPC is aware that on June 1, 2018, President Trump ordered Energy Secretary Rick Perry to "prepare immediate steps" to stop the closing of unprofitable coal and nuclear plants around the country. <sup>3</sup> OPC is unaware of the timing of a recommendation to be produced by Energy Secretary Perry and if it would be in time to delay KPLC's retirements of the Montrose units and common plant.

### **11 GMO Depreciation Recommendation**

### Q. What is OPC's position on depreciation expense for Sibley Units 1, 2, and 3?

A. GMO is seeking that its currently ordered depreciation rates be continued. OPC states it would be unjust and unreasonable to include continued depreciation expense for the Sibley units when determining going-forward rates given GMO's announcement it is retiring the Montrose units at the end of 2018, six months after the end of the true-up period. Based on GMO's application new rates will go into effect by December 29, 2018. GMO's position would allow it to get continued depreciation expense built into rates for facilities it will soon retire at the Sibley location after rates become effective. Once the units are retired off the books, GMO when then no longer be required to book depreciation expense to the depreciation reserve for those units, instead those dollars will become profit. OPC recommends that the depreciation rates for Sibley Units 1, 2, 3, and Sibley common plant be set to zero percent as the units will no longer be used and useful by the time new rates from this case are effective.

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### Q. What is OPC's position on depreciation expense for Lake Road Unit 4/6?

<sup>&</sup>lt;sup>3</sup> New York Times article "Trump Orders a Lifeline for Struggling Coal and Nuclear Plants" published June 1,2018

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A. The Commission should order GMO to continue to use the currently ordered depreciation rates for Lake Road Unit 4/6, and depreciation expense for Lake Road Unit 4/6 should be built into GMO's revenue requirement. Since GMO has announced it is retiring Lake Road Unit 4/6 by the end of 2019, it is appropriate to place a tracker on the depreciation expense that is built into rates for the unit in order to protect and give ratepayers recognition of amount they are paying in depreciation expense for the unit in rates, but that will no longer be booked as depreciation expense once unit is retired.

# Q. What is OPC's recommendation if the Commission should grant continued depreciation expense for Sibley units 1, 2, and 3, and Lake Road Unit 4/6 at the current ordered depreciation rates?

If the Commission orders GMO to continue to use the current ordered depreciation rates A. 11 on the Sibley units and Lake Road unit 4/6, OPC requests that the Commission order a 12 tracker be put in place to account for the depreciation expense GMO will no longer book 13 after the units are retired. Ratepayers should be given full credit for the depreciation 14 expense GMO is collecting in rates for retired units, units which no longer provide either 15 energy or capacity. Senate Bill 564, which was signed into law on June 1, 2018, allows for 16 plant-in-service accounting which allows for the deferral of 85% of the depreciation 17 18 expense for plant placed in-service in between rate cases. This was previously positive regulatory lag for the customers; however, now ratepayers will be picking up the deferred 19 20 depreciation expense and rate of return over a twenty-year period. With this reduction in risk for the shareholders of the utility, it is only just and reasonable that the Commission 21 22 protect ratepayers. The Commission should do so by tracking and then offsetting future rate base the depreciation expense that was built into rates for retired units until rates are 23 24 reset in the next general rate case.

# Q. Has OPC estimated the magnitude of the unrecovered original cost for the Sibley facilities and Lake Road unit 4/6?

A. OPC calculated the unrecovered cost for Sibley units 1, 2, 3, and common plant including cost of removal to be \$409,028,847 at the expected retirement date of December 31, 2018.

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Of that value, Sibley unit 3 is estimated to have a short fall of \$280,036,531 if retired at the end of 2018. Lake Road Unit 4/6 expected to retire by end of 2019 is projected to be under recover by \$34,400,426, including cost of removal if retired in December of 2019 as GMO has publicly announced.

# Q. Does OPC recommend recovery of GMO's estimated unrecovered original cost for Sibley Units 1, 2, and 3, and Lake Road Unit 4/6 in this case?

A. No. The only recovery to be addressed in this case for these units is the remaining depreciation expense until the units are retired by end of 2018. Based on KCPL's application OPC recommends setting the depreciation rates to zero percent for all of the Sibley accounts, as the units will be retired by the effective date of new rates in this case.

For Lake Road Unit 4/6, OPC recommends the continued use of the current ordered depreciation rates in this case, and OPC recommends a tracker for depreciation expense for Lake Road Unit 4/6, so that rate payer can receive credit for the payment of depreciation expense that was built into rates for this unit after it is retired by the end of 2019 until new rates are set in the next general rate case.

### 16 Q. Is OPC aware of anything that may change its position on this matter?

A. Yes. OPC is aware that on June 1, 2018, President Trump ordered Energy Secretary Rick
 Perry to "prepare immediate steps" to stop the closing of unprofitable coal and nuclear
 plants around the country. <sup>4</sup> OPC is unaware of the timing of a recommendation to be
 produced by Energy Secretary Perry and if it would be in time to delay the retirement of
 the Montrose units and common plant.

- 22 **GMO Additional Amortization** 
  - Q. As part of Case No. ER-2016-0156, did GMO get an additional amortization related to depreciation expense?

<sup>&</sup>lt;sup>4</sup> New York Times article "Trump Orders a Lifeline for Struggling Coal and Nuclear Plants" published June 1,2018

A. Yes as part of the Stipulation and Agreement in Case No. ER-2016-0156, GMO was granted an additional amortization of \$7.2 million related to depreciation expense.

### **Q.** Does OPC have a position related to this additional amortization?

A. OPC's first recommendation is to remove the additional amortization on a going forward basis. As part of the stipulation and agreement the additional amortization was to be in place until rates were set in the next rate case—this case; also as part of that next rate case parties were to recommend where the dollars collected as additional depreciation expense should be booked. OPC requests that the Commission order GMO to record all additional depreciation expense received through the additional amortization of \$7.2 million since its last rate case as reserve additions to the FERC sub accounts for the Sibley generation facilities. The language from the Non-Unanimous Stipulation and Agreement follows:

In addition to the attached schedule, GMO shall be allowed to collect an annual amortization amount equal to \$7.2 million. This additional amortization shall be booked and accounted for on an annual basis until GMO's next general electric rate case. In GMO's next filed rate case the Commission will determine the distribution of the additional amortization. The balance will be used to cover any deficiencies in reserves across production, transmission and distribution accounts. Any undistributed balance will be used as an offset to future rate base. This amortization is for purpose of settlement of this case only and does not constitute an agreement as to the methodology or a precedent for any future rate case.

OPC also requests that the Commission not continue to authorize the additional amortization for depreciation expense of \$7.2 million. The Commission should remove the \$7.2 million additional amortization from rates going forward.

### **KCPL Operations and Maintenance Expense**

# Q. What is OPC's position on operations and maintenance expense for the Montrose units?

A. Consistent with OPC's position on depreciation expense, for the Montrose units and Montrose common plant that will be retired by the end of 2018 no operations or

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maintenance expense should be included in the costs of service used for setting rates in these cases.

# Q. Why should the costs of service for KCPL not include operations and maintenance expense for Montrose?

A Based on the applications, new rates are projected to become effective December 29, 2018. When paired with the announcement of the retirements of the Montrose units and Montrose common plant by the end of 2018, the longest the units could be operating under new rates is two days. It is very likely that by the time new rates from these cases are effective the units will have been retired. Ratepayers should not be asked to pay for operations and maintenance expense on units that are no longer used and are not providing a benefit.

### **11 GMO Operations and Maintenance Expense**

# Q. What is OPC's position on operations and maintenance expense for the Sibley units and Sibley common plant?

A. Consistent with OPC's position on depreciation expense, for the Sibley units and Sibley common plant that will be retired by the end of 2018 no operations or maintenance expense should be included in the costs of service used for setting rates in these cases.

# Q. Why should the costs of service for GMO not include operations and maintenance expense for Sibley?

A Based on the applications, new rates are projected to become effective December 29, 2018.
When paired with the announcement of the retirements of the Sibley units and Sibley
common plant by the end of 2018, the longest the units could be operating under new rates
is two days. It is very likely that by the time new rates from these cases are effective the
units will have been retired. Ratepayers should not be asked to pay for operations and
maintenance expense on units that are no longer used and are not providing a benefit.

#### **ONE CIS** 1 2 Q. What is the cost of the ONE CIS solution? A. KCPL and GMO have provided three in person update meetings related to the project to 3 which I personally attended there may have been more. In the April 3, 2018 update meeting 4 provided a confidential value of the ONE CIS. The original control budget was \*\* 5 \*\*; additionally during this update meeting KCPL and GMO discussed a 93 day 6 7 delay during system integration testing and provided an updated estimate of the budget \*\* \*\* at completion. 8 Q. What is OPC's position related to ONE CIS solution? 9 A. OPC seeks to allocate the costs that are fair and just for Missouri ratepayers. The ONE 10 CIS is a major factor of the savings that the merger with Westar as it will allow Westar to 11 be integrated into the system without having to foot the bill for an entirely separate system 12 at some point in the future. 13 14 Q. What allocation method is OPC recommending? A. At this time OPC still has pending discovery related to this issue. OPC will be better 15 16 positioned at rebuttal to provide an allocation method and cost estimates for the KCPL MO 17 and GMO jurisdictions to be included in the cost of service for these cases. Q. Would you briefly summarize OPC's recommendations provided in your testimony? 18 19 A. OPC recommends that all costs associated with the retirements of KCPL's Montrose units 2, 3, and common plant, and GMO's Sibley units 1, 2, 3, and common plant not be included 20 in the costs of service of KPCL and GMO used for setting rates in these cases as these units 21 will be retired by end of 2018. The estimated reserve shortfall for KCPL's Montrose 22 facilities is \$65,129,906. The estimated reserves shortfall for GMO's Sibley facilities is 23 \$409,028,847. Additionally, OPC recommends the Commission stop the \$7.2 million 24 25 additional amortization related to depreciation expense for GMO. OPC recommends a decrease in depreciation expense for KCPL related to the Montrose retirements of 26 \$3,139,379 based on depreciation expense of true-up accounting schedules from Case No. 27 ER-2016-0285. OPC recommends a decrease in depreciation expense for GMO related to 28

the Sibley retirements of \$9,875,199 based on depreciation expense of direct accounting schedules from Case No. ER-2016-0156. OPC recommends that all operations and maintenance expenses for KCPL Montrose and GMO Sibley facilities not be included in the costs of service of KPCL and GMO used for setting rates in these cases.

### 5 Q. Does this conclude your direct testimony?

A. Yes, it does.

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Page 18 of 18

# John A. Robinett

I am employed as a Utility Engineering Specialist for The Missouri Office of the Public Counsel (OPC). I began employment with OPC in August of 2016. In May of 2008, I graduated from the University of Missouri-Rolla (now Missouri University of Science and Technology) with a Bachelor of Science degree in Mechanical Engineering.

During my time as an undergraduate, I was employed as an engineering intern for the Missouri Department of Transportation (MoDOT) in their Central Laboratory located in Jefferson City, Missouri for three consecutive summers. During my time with MoDOT, I performed various qualification tests on materials for the Soil, Aggregate, and General Materials sections. A list of duties and tests performed are below:

- Compressive strength testing of 4" and 6" concrete cylinders and fracture analysis
- Graduations of soil, aggregate, and reflective glass beads
- Sample preparations of soil, aggregate, concrete, and steel
- Flat and elongated testing of aggregate
- Micro-deval and LA testing of aggregate
- Bend testing of welded wire and rebar
- Tensile testing of welded, braided cable, and rebar
- Hardness testing of fasteners (plain black and galvanized washers, nuts, and bolts)
- Proof loading and tensile testing of bolts
- Sample collection from active road constructions sites
- Set up and performed the initial testing on a new piece of equipment called a Linear Traverse / Image Analysis
- Wrote operators manual for the Linear Traverse / Image Analysis Machine
- Trained a fulltime employee on how to operate the machine prior to my return to school
- Assisted in batching concrete mixes for testing, mixing the concrete, slump cone testing, percent air testing, and specimen molding of cylinders and beams

Upon graduation, I accepted a position as an Engineer I in the Product Evaluation Group for Hughes Christensen Company, a division of Baker Hughes, Inc. (Baker), an oil field service company. During my employment with Baker, I performed failure analysis on oil field drill bits as well as composed findings reports which were forwarded to the field engineers in order for them to report to the company the conclusions of the failure causes.

I previously was employed as a Utility Engineering Specialist I, II, III for the Missouri Public Service Commission (Commission). My employment with the Commission spanned from April of 2010 to August of 2016. My duties involved analyzing deprecation rates and studies for utility companies and presenting expert testimony in rate cases before the Commission.

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Listed below are the cases in which I have supplied testimony, comments, and/or depreciation rates accompanied by a signed affidavit.

Company	Case Number	Issue	Party
Empire District Electric Company	EO-2018-0092	Rebuttal, Surrebuttal, Affidavit in Opposition, Additional Affidavit and Live Testimony	Office of Public Counsel (OPC)
Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities	GR-2018-0013	Rebuttal and Surrebuttal Testimony depreciation, general plant amortization	OPC
Laclede Gas Company Missouri Gas Energy Spire Missouri East Spire Missouri West	GO-2016-0332 GO-2016-0333 GO-2017-0201 GO-2017-0202 GR-2017-0215 GR-2017-0216	ISRS Over collection of depreciation expense and ROE based on Western District Opinion Docket No. WD80544	OPC
Gascony Water Company, Inc.	WR-2017-0343	Rebuttal, Surrebuttal, and Live Testimony rate base, depreciation, NARUC USoA Class designation	OPC
Missouri American Water Company	WR-2017-0285	Direct, Rebuttal, Surrebuttal, and Live Testimony depreciation, ami, negative reserve, Lead Line	OPC
Indian Hills Utility Operating Company, Inc.	WR-2017-0259	Direct, Rebuttal, Surrebuttal, and Live Testimony Rate Base (extension of electric service, leak repairs)	OPC
Laclede Gas Company Missouri Gas Energy	GR-2017-0215 GR-2017-0216	Direct, Rebuttal, Surrebuttal, True-up Rebuttal, and Live Testimony depreciation, retirement work in progress, combined heat and power, ISRS	OPC

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Company	Case Number	Issue	Party
Empire District Electric Company	EO-2018-0048	IRP Special issues	OPC
Kansas City Power & Light Company	EO-2018-0046	IRP Special issues	OPC
Kansas City Power & Light Company Greater Missouri Operations	EO-2018-0045	IRP Special issues	OPC
Kansas City Power & Light Company Greater Missouri Operations	EO-2017-0230	2017 IRP annual update comments	OPC
Empire District Electric Company	EO-2017-0065	Direct, Rebuttal, Surrebuttal, and Live Testimony FAC Prudence Review Heat Rate	OPC
Ameren Missouri	ER-2016-0179	Direct, Rebuttal, Testimony Heat Rate Testing &Depreciation	OPC
Kansas City Power & Light Company	ER-2016-0285	Direct, Rebuttal, Surrebuttal, and Live Testimony Heat Rate Testing &Depreciation	OPC
Empire District Electric Company Merger with Liberty	EM-2016-0213	Rebuttal Testimony	Missouri Public Service Commission (MOPSC)
Empire District Electric Company	ER-2016-0023	Depreciation Study, Direct, Rebuttal, and Surrebuttal Testimony	MOPSC
Hillcrest Utility Operating Company, Inc.	SR-2016-0065	Depreciation Review	MOPSC
Hillcrest Utility Operating Company, Inc.	WR-2016-0064	Depreciation Review	MOPSC
Missouri American Water Company	WR-2015-0301	Depreciation Study, Direct, Rebuttal, and Surrebuttal Testimony	MOPSC

Company	Case Number	Issue	Party
Bilyeu Ridge Water Company, LLC Midland Water Company, Inc. Moore Bend Water Utility, LLC Riverfork Water Company	WR-2015-0192 WR-2015-0193 WR-2015-0194 WR-2015-0195	Depreciation Review	
Taney County Water, LLC Valley Woods Utility, LLC(Water) Valley Woods Utility, LLC(Sewer) Consolidated into Ozark International, Inc.	WR-2015-0195 WR-2015-0196 WR-2015-0197 SR-2015-0198 Consolidated into WR-2015-0192	*filed depreciation rates not accompanied by signed affidavit	MOPSC
I. H. Utilities, Inc. sale to Indian Hills Utility Operating Company, Inc.	WO-2016-0045	Depreciation Rate Adoption CCN	MOPSC
Missouri American Water Company CCN City of Arnold	SA-2015-0150	Depreciation Rate Adoption CCN	MOPSC
Empire District Electric Company	ER-2014-0351	Direct, Rebuttal, and Surrebuttal Testimony	MOPSC
West 16th Street Sewer Company, W.P.C. Sewer Company, Village Water and Sewer Company, Inc. and Raccoon Creek Utility Operating Company, Inc.	SM-2015-0014	Depreciation Rate Adoption	MOPSC
Brandco Investments LLC and Hillcrest Utility Operating Company, Inc.	WO-2014-0340	Depreciation Rate Adoption, Rebuttal Testimony	MOPSC
Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities	GR-2014-0152	Direct, Rebuttal, Surrebuttal and Live Testimony	MOPSC
Summit Natural Gas of Missouri, Inc	GR-2014-0086	Depreciation Study, Direct and Rebuttal Testimony	MOPSC
P.C.B., Inc.	SR-2014-0068	Depreciation Review	MOPSC
M.P.B., Inc.	SR-2014-0067	Depreciation Review	MOPSC
Roy-L Utilities	WR-2013-0543	Depreciation Review	MOPSC
Roy-L Utilities	SR-2013-0544	Depreciation Review	MOPSC
Missouri Gas Energy Division of Laclede Gas Company	GR-2014-0007	Depreciation Study, Direct and Rebuttal Testimony	MOPSC
Central Rivers Wastewater Utility, Inc.	SA-2014-00005	Depreciation Rate Adoption	MOPSC

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Company	Case Number	Issue	Party
Empire District Electric Company	ER-2012-0345	Depreciation Study, Direct, Rebuttal, and Surrebuttal Testimony	MOPSC
Empire District Electric Company	WR-2012-0300	Depreciation Review	MOPSC
Laclede Gas Company	GO-2012-0363	Depreciation Authority Order Rebuttal, Surrebuttal and Live Testimony	MOPSC
Moore Bend Water Company, Inc. sale to Moore Bend Water Utility, LLC (Water)	WM-2012-0335	Depreciation Rate Adoption	MOPSC
Oakbrier Water Company, Inc.	WR-2012-0267	Depreciation Review	MOPSC
Lakeland Heights Water Co., Inc.	WR-2012-0266	Depreciation Review	MOPSC
R.D. Sewer Co., L.L.C.	SR-2012-0263	Depreciation Review	MOPSC
Canyon Treatment Facility, LLC	SA-2010-0219	Depreciation Rate Adoption- CCN	MOPSC
Taney County Water, LLC	WR-2012-0163	Depreciation Review	MOPSC
Sale of Saddlebrooke Water and Sewer Infrastructure, LLC to Missouri American Water Company (Sewer)	SA-2012-0067	Rebuttal Testimony	MOPSC
Sale of Saddlebrooke Water and Sewer Infrastructure, LLC to Missouri American Water Company (Water)	WA-2012-0066	Rebuttal Testimony	MOPSC
Midland Water Company, Inc.	WR-2012-0031	Depreciation Review	MOPSC
Sale of KMB Utility Corporation to Algonquin Water Resources of Missouri, LLC, d/b/a Liberty Water (Sewer)	SO-2011-0351	Depreciation Rate Adoption	MOPSC
Sale of KMB Utility Corporation to Algonquin Water Resources of Missouri, LLC, d/b/a Liberty Water (Water)	WO-2011-0350	Depreciation Rate Adoption	MOPSC
Sale of Noel Water Company, Inc. to Algonquin Water Resources of Missouri, LLC, d/b/a Liberty Water (Water)	WO-2011-0328	Depreciation Rate Adoption	MOPSC
Sale of Taney County Utilities Corporation to Taney County Water, LLC (Water)	WM-2011-0143	Depreciation Rate Adoption	MOPSC

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Company	Case Number	Issue	Party
Empire District Electric Company	ER-2011-0004	Depreciation Study, Direct, Rebuttal, and Surrebuttal Testimony	MOPSC
Rex Deffenderfer Enterprises, Inc.	WR-2011-0056	Depreciation Review	MOPSC
Tri-States Utility, Inc	WR-2011-0037	Depreciation Review	MOPSC
Southern Missouri Gas Company, L.P.	GE-2011-0096	Depreciation Study Waiver	MOPSC
Southern Missouri Gas Company, L.P.	GR-2010-0347	Depreciation Review	MOPSC
KMB Utility Corporation (Sewer)	SR-2010-0346	Depreciation Review	MOPSC
KMB Utility Corporation (Water)	WR-2010-0345	Depreciation Review	MOPSC
Middlefork Water Company	WR-2010-0309	Depreciation Review	MOPSC

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# **KCP&L Announces Plans to Cease Burning Coal at Three Power Plants**

1/20/2015

MEDIA CONTACT: KCP&L 24-Hour Media Hotline (816) 392-9455

### KCP&L FURTHERS SUSTAINABILITY COMMITMENT BY ANNOUNCING PLANS TO CEASE BURNING COAL AT THREE POWER PLANTS

KANSAS CITY, Mo. (January 20, 2015) — Kansas City Power & Light Company (KCP&L) announced today that in the coming years it will no longer burn coal at three of its coal-fired power plants, Montrose Station, one of its units at Lake Road Station and two of its units at Sibley Station. This announcement furthers the company's commitment to a sustainable energy future and balanced generation portfolio. Lake Road's boiler already has the ability to burn natural gas and the company plans to operate on natural gas once it ceases coal combustion. In the coming years, KCP&L will make final decisions regarding whether to retire the units at Montrose and Sibley, or convert them to an alternative fuel source.

"After evaluating options for future environmental regulation compliance, ending coal use at these plants is the most cost effective and cleanest option for our customers," said Terry Bassham, President and CEO of Great Plains Energy and KCP&L. "By retiring or converting more than 700 megawatts of coal-fired generation, we'll take an even bigger step toward reducing emissions and improving the air quality in our region." The decision comes in part as a result from recent Environmental Protection Agency (EPA) regulations, which would require KCP&L to make significant environmental upgrades in the coming years in order to continue burning coal at these power plants. While retrofitting our largest, newer coal-fired power plants was the most cost-effective way to comply with environmental regulations, the same cannot be said for the older, smaller units at Montrose, Lake Road and Sibley. Retiring or converting the units at Montrose, Lake Road and Sibley will be a more cost-effective way to meet environmental regulations.

Generating Unit:	Capacity:	In-Service Year:	Cease Coal Burning By:
Lake Road 6	96 MW	1967	December 31, 2016
Montrose 1	170 MW	1958	December 31, 2016
Sibley 1	48 MW	1960	December 31, 2019
Sibley 2	51 MW	1962	December 31, 2019
Montrose 2	164 MW	1960	December 31, 2021
Montrose 3	176 MW	1964	December 31, 2021

#### Timeline for Coal Cessation:

While this decision will impact employees at Montrose, Lake Road and Sibley, the utility does not anticipate that any employees will lose jobs as a result. KCP&L will find job opportunities within the company for displaced employees.

"For decades, coal has been a reliable, very low cost way to provide power to our customers, and is one reason why our rates are lower than the national average," said Bassham. "However, as our nation moves to a cleaner, more sustainable energy future, our industry is facing increasing environmental scrutiny and regulations, many of which are focused on coal-fired generation. Our commitment and focus is to move to a cleaner energy future for our region while balancing the cost impact to our customers."

Today's announcement is part of the utility's larger plan to provide cleaner energy to

the region. KCP&L has the largest renewable energy and largest per capita energy efficiency portfolios of any investor-owned utility in the region. In addition, the utility recently made a number of new environmental investments and commitments, including the announcement of up to 400 MW of additional wind power and expanded energy-efficiency programs for customers.

For more information on KCP&L's sustainability efforts, visit <u>www.kcpl.com/environment</u>.

# **About Great Plains Energy:**

Headquartered in Kansas City, Mo., Great Plains Energy Incorporated (NYSE: GXP) is the holding company of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company, two of the leading regulated providers of electricity in the Midwest. Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company use KCP&L as a brand name. More information about the companies is available on the Internet at: <u>www.greatplainsenergy.com</u> or <u>www.kcpl.com</u>.

# **Forward-Looking Statements:**

Statements made in this release that are not based on historical facts are forwardlooking, may involve risks and uncertainties, and are intended to be as of the date when made. Forward-looking statements include, but are not limited to, the outcome of regulatory proceedings, cost estimates of capital projects and other matters affecting future operations. In connection with the safe harbor provisions of the Private Securities Litigation Reform Act of 1995, Great Plains Energy and KCP&L are providing a number of important factors that could cause actual results to differ materially from the provided forward-looking information. These important factors include: future economic conditions in regional, national and international markets and their effects on sales, prices and costs; prices and availability of electricity in regional and national wholesale markets; market perception of the energy industry, Great Plains Energy and KCP&L; changes in business strategy, operations or development plans; the outcome of contract negotiations for goods and services; effects of current or proposed state and federal legislative and regulatory actions or developments, including, but not limited to, deregulation, re-regulation and restructuring of the electric utility industry; decisions of regulators regarding rates the Companies can charge for electricity; adverse changes in applicable laws, regulations, rules, principles or practices governing tax, accounting and

environmental matters including, but not limited to, air and water quality; financial market conditions and performance including, but not limited to, changes in interest rates and credit spreads and in availability and cost of capital and the effects on nuclear decommissioning trust and pension plan assets and costs; impairments of long-lived assets or goodwill; credit ratings; inflation rates; effectiveness of risk management policies and procedures and the ability of counterparties to satisfy their contractual commitments; impact of terrorist acts, including but not limited to cyber terrorism; ability to carry out marketing and sales plans; weather conditions including, but not limited to, weather-related damage and their effects on sales, prices and costs; cost, availability, quality and deliverability of fuel; the inherent uncertainties in estimating the effects of weather, economic conditions and other factors on customer consumption and financial results; ability to achieve generation goals and the occurrence and duration of planned and unplanned generation outages; delays in the anticipated in-service dates and cost increases of generation, transmission, distribution or other projects; Great Plains Energy's ability to successfully manage transmission joint venture; the inherent risks associated with the ownership and operation of a nuclear facility including, but not limited to, environmental, health, safety, regulatory and financial risks; workforce risks, including, but not limited to, increased costs of retirement, health care and other benefits; and other risks and uncertainties.

This list of factors is not all-inclusive because it is not possible to predict all factors. Other risk factors are detailed from time to time in Great Plains Energy's and KCP&L's quarterly reports on Form 10-Q and annual report on Form 10-K filed with the Securities and Exchange Commission. Each forward-looking statement speaks only as of the date of the particular statement. Great Plains Energy and KCP&L undertake no obligation to publicly update or revise any forward-looking statement, whether as a result of new information, future events or otherwise.

#### Latest Press Releases

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KCPL Continues Sustainability Commitment by Announcing Retirement of Six Units at Three Power Plants

# KCP&L Continues Sustainability Commitment by Announcing Retirement of Six Units at Three Power Plants

6/2/2017

Media Contact: KCP&L 24-hour Media Hotline (816) 392-9455

**KANSAS CITY, Mo. (June 2, 2017)** — Kansas City Power & Light Company (KCP&L) announces its plans to retire six generating units at the company's Montrose, Lake Road and Sibley Stations. These actions further the company's commitment to a sustainable energy future and balanced generation portfolio.

"When these power plants started operation more than 50 years ago, coal was the primary means of producing energy. Today, as part of our diverse portfolio, we have cleaner ways to generate the energy our customers need," said Terry Bassham, President and CEO of Great Plains Energy and KCP&L. "After considering many options, it is clear that retiring units at Montrose, Lake Road and Sibley is the most cost-effective way to meet our customers' energy needs as we continue to move to a more sustainable energy future."

In 2015, KCP&L announced the company was considering retiring the coal units or converting them to an alternative fuel source at these plants. One coal-fired unit at the

https://www.kcpl.com/about-kcpl/media-center/2017/june/kcpl-continues-sustainability-co... 6/5/2018

Lake Road Station was converted to natural gas in 2016. Since that time, several emerging industry trends and changing circumstances led the company to announce its plans to retire the six generating units.

A number of factors contributed to the decision to retire these units, including:

- Reduction in wholesale electricity market prices. The value of energy produced by these plants has dropped in recent years, primarily driven by new wind generation and lower natural gas prices.
- Near-term capacity needs. KCP&L does not anticipate needing new capacity for many years with expected relatively flat long-term peak load growth. In addition, the amount of reserve generating capacity the company is required to carry has been reduced.
- Plant age. The impacted units are older, with all beginning service between 1960-1969. Making costly investments in the units does not make financial sense when compared to other generation sources.
- Expected environmental compliance costs. It is not economic to retrofit these plants with the controls necessary to meet expected environmental requirements.

Wind energy sources have become a much more economic generation resource for the region. According to the Southwest Power Pool, of which KCP&L is a member, energy generation from wind has increased 30 percent year-over-year in 2016. KCP&L announced plans in 2016 to purchase an additional 500 megawatts (MW) of power from two new wind facilities at Osborn and Rock Creek. In 2017, the company is set to increase its renewable portfolio to more than 1,450 MW, or greater than 20 percent of KCP&L's total generating capacity needs.

"In addition to our substantial renewable energy portfolio, KCP&L has the largest per capita energy efficiency portfolio of any investor-owned utility in the region," said Bassham. "By retiring these plants, KCP&L is taking another step forward in our plan to provide cleaner, cost effective energy to our customers."

KCP&L intends to retire all the Montrose and Sibley coal units by December 31, 2018. The Lake Road natural gas unit will be retired by December 31, 2019. Lake Road's steam operations are not impacted by today's announcement. KCP&L is committed to making every reasonable effort to find job opportunities within the company for employees currently working at these plants.

Timeline for Retirement:

https://www.kcpl.com/about-kcpl/media-center/2017/june/kcpl-continues-sustainability-co... 6/5/2018

KCP&L Continues Sustainability Commitment by Announcing Retirement of Six Units at... Page 3 of 6

Generating Unit	Capacity	In-service	Retire by
Lake Road 4/6	97 MW	1967	Dec. 31, 2019
Montrose 2	164 MW	1960	Dec. 31, 2018
Montrose 3	176 MW	1964	Dec. 31, 2018
Sibley 1	48 MW	1960	Dec. 31, 2018
Sibley 2	51 MW	1962	Dec. 31, 2018
Sibley 3	364 MW	1969	Dec. 31, 2018

For more information on KCP&L's sustainability efforts, visit www.kcpl.com/environment.

#### ####

#### About Great Plains Energy:

Headquartered in Kansas City, Mo., Great Plains Energy Incorporated (NYSE: GXP) is the holding company of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company, two of the leading regulated providers of electricity in the Midwest. Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company use KCP&L as a brand name. More information about the companies is available on the Internet at: <u>www.greatplainsenergy.com</u> or <u>www.kcpl.com</u>.

#### Forward-Looking Statements:

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https://www.kcpl.com/about-kcpl/media-center/2017/june/kcpl-continues-sustainability-co... 6/5/2018

Great Plains Energy and KCP&L; changes in business strategy, operations or development plans; the outcome of contract negotiations for goods and services; effects of current or proposed state and federal legislative and regulatory actions or developments, including, but not limited to, deregulation, re-regulation and restructuring of the electric utility industry; decisions of regulators regarding rates the Companies can charge for electricity; adverse changes in applicable laws, regulations, rules, principles or practices governing tax, accounting and environmental matters including, but not limited to, air and water quality; financial market conditions and performance including, but not limited to, changes in interest rates and credit spreads and in availability and cost of capital and the effects on nuclear decommissioning trust and pension plan assets and costs; impairments of long-lived assets or goodwill; credit ratings; inflation rates; effectiveness of risk management policies and procedures and the ability of counterparties to satisfy their contractual commitments; impact of terrorist acts, including but not limited to cyber terrorism; ability to carry out marketing and sales plans; weather conditions including, but not limited to, weather-related damage and their effects on sales, prices and costs; cost, availability, quality and deliverability of fuel; the inherent uncertainties in estimating the effects of weather, economic conditions and other factors on customer consumption and financial results; ability to achieve generation goals and the occurrence and duration of planned and unplanned generation outages; delays in the anticipated in-service dates and cost increases of generation, transmission, distribution or other projects; Great Plains Energy's ability to successfully manage transmission joint venture; the inherent risks associated with the ownership and operation of a nuclear facility including, but not limited to, environmental, health, safety, regulatory and financial risks; workforce risks, including, but not limited to, increased costs of retirement, health care and other benefits; and other risks and uncertainties.

This list of factors is not all-inclusive because it is not possible to predict all factors. Other risk factors are detailed from time to time in Great Plains Energy's and KCP&L's quarterly reports on Form 10-Q and annual report on Form 10-K filed with the Securities and Exchange Commission. Each forward-looking statement speaks only as of the date of the particular statement. Great Plains Energy and KCP&L undertake no obligation to publicly update or revise any forward-looking statement, whether as a result of new information, future events or otherwise. KCP&L Continues Sustainability Commitment by Announcing Retirement of Six Units at... Page 5 of 6

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KCP&L Continues Sustainability Commitment by Announcing Retirement of Six Units at... Page 6 of 6

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ER-2018-0145 and ER-2018-146

# KANSAS CITY POWER & LIGHT COMPANY and KANSAS CITY POWER LIGHT GREATER OPERATIONSCOMPANY

SCHEDULE JAR-D-4

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# **SPP 2017 RESOURCE ADEQUACY REPORT**

Published on June 19th, 2017

By Resource Adequacy Coordination

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# **REVISION HISTORY**

DATE OR VERSION NUMBER	AUTHOR	CHANGE DESCRIPTION	COMMENTS

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# **OVERVIEW AND ASSUMPTIONS**

SPP submitted Tariff revisions to implement a Resource Adequacy Requirement (RAR) on March 3, 2017 (<u>ER17-1098</u>).

Attachment AA requires a Load Responsible Entity (LRE) to maintain capacity required to meet its load and planning reserve obligations. No later than June 15<sup>th</sup> of each year, a final report on the status of each LRE's compliance with the RAR for the upcoming Summer Season will be posted on the SPP website.

This report will assess resource adequacy across the SPP Balancing Authority (BA) for the 2017 Summer Season, and provide a five-year outlook of the BA and LREs, beginning with the 2018 Summer Season. The data for this report originates from the LRE and Generator Owner (GO) submitted Workbooks.

The reserve margin calculation is an industry planning metric used to examine future resource adequacy. This deterministic approach examines the forecasted Net Peak Demand (load) and the availability of existing resources to serve the forecasted Net Peak Demand for the current Summer Season and a five-year outlook.

Net Peak Demand projections, or load forecasts, are provided by each LRE. Load forecasts include peak hourly load, or Peak Demand, for the Summer Season of each year. Peak Demand projections are based on normal weather (50/50 distribution) and provided on a non-coincident basis.

### DEFINITIONS

### **Firm Capacity**

The projected accredited capacity of an LRE's commercially operable generating units, or portions of generating units, adjusted to reflect purchases and sales of accredited capacity with another party, and that is supported by firm transmission service to the LRE's load, or is Deliverable Capacity to meet the PRM portion of the Resource Adequacy Requirement.

### **Firm Power**

Power sales and purchases deliverable with firm transmission service where the seller assumes the obligation to serve the purchaser's load with capacity, energy, and planning reserves that must be continuously available in a manner comparable to power delivered to native load customers.

### Load Responsible Entity

An Asset Owner represented in the Integrated Marketplace with a registered physical asset that is either a) load or b) an Export Interchange Transaction as specified in Section 5.4 of Attachment AA.

### **Net Peak Demand**

The forecasted Peak Demand less the a) projected impacts of demand response programs and behind-the-meter generation that are controllable and dispatchable and not registered as a Resource and b) contract amount of Firm Power purchased under agreements in effect as of the time of the forecasted Peak Demand, plus the contract amount of Firm Power sold to others in effect as of the time of the forecasted Peak Demand

### **Peak Demand**

The highest demand including transmission losses for energy measured over a one clock hour period

### **Planning Reserve Margin**

The Planning Reserve Margin ("PRM") shall be twelve percent (12%). If an LRE's Firm Capacity is comprised of at least seventy-five percent (75%) hydro-based generation, then such PRM shall be nine point eight nine percent (9.89%).

### **Resource Adequacy Requirement**

The Resource Adequacy Requirement is equal to the LRE's Summer Season Net Peak Demand plus its Summer Season Net Peak Demand multiplied by the PRM.

### **Summer Season**

June 1st through September 30th of each year.

### SPP HIGHLIGHTS

The Southwest Power Pool (SPP) BA covers 575,000 square miles and encompasses all or parts of Arkansas, Iowa, Kansas, Louisiana, Minnesota, Missouri, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas and Wyoming. The SPP footprint has approximately 61,000 miles of transmission lines, 756 generating plants, and 4,811 transmission-class substations, and it serves a population of 18 million people.



- SPP's PRM target is 12%
- The six year assessment period starting in 2017 based on Firm Capacity is projected to be 29.7% and decreases to 25.9% by 2022
- Six year (2017-2022) peak demand average annual growth rate is 1.1%





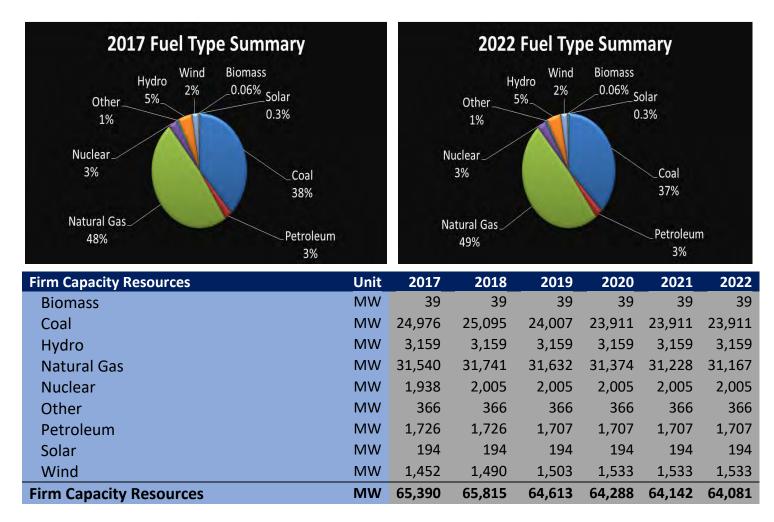
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### SPP CURRENT AND FIVE-YEAR OUTLOOK

Demand Summary	2017	2018	2019	2020	2021	2022
Peak Demand (Forecasted)	52,665	53,065	53,116	53,158	53 <i>,</i> 440	53,779
Controllable and Dispatchable DR - Available	663	708	736	744	730	725
Controllable and Dispatchable DEG - Available	164	160	161	142	139	141
Firm Power Purchases	1,655	1,655	1,553	1,551	1,551	1,551
Firm Power Sales	260	200	100	99	100	115
Net Peak Demand (Forecasted)	50,444	50,743	50,767	50,821	51,121	51,477
Firm Capacity (Units - MW)	2017	2018	2019	2020	2021	2022
Other Capacity Adjustments - Additions	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	397	41	41	5	5	5
Confirmed Retirements	16	388	1,170	1,379	1,469	1,469
Unconfirmed Retirements	0	83	236	236	236	478
Scheduled Outages	520	566	45	0	0	0
Transmission Limitations	14	0	0	0	0	0
Firm Capacity Purchases	277	277	277	279	279	179
Firm Capacity Sales	674	549	934	934	534	534
Firm Capacity Resources	65,390	65,815	64,613	64,288	64,142	64,081
Firm Capacity Resources (Other)	0	0	0	0	0	0
Firm Capacity (e.g. 65,390+674+277-14-520-397)	65,410	66,035	65,738	65,496	64,951	64,790
Planning Reserve Margin ( e.g. 65,390-50,444/65,390)	29.7%	30.1%	29.5%	28.9%	27.1%	25.9%
Resource Adequacy Requirement (e.g. 50,444 *12%)	56,497	56,832	56,859	56,919	57,256	57,655
SPP Excess Capacity	8,913	9,203	8,879	8,577	7,695	7,135

# FUEL TYPE SUMMARY

The Firm Capacity is based on the available LRE and GO excess generation for the Summer Season. The amount of confirmed retirements increases from 16 MW to 1,469 MW by 2022, with coal accounting for 61% of the retirements and natural gas for the remaining 39%.

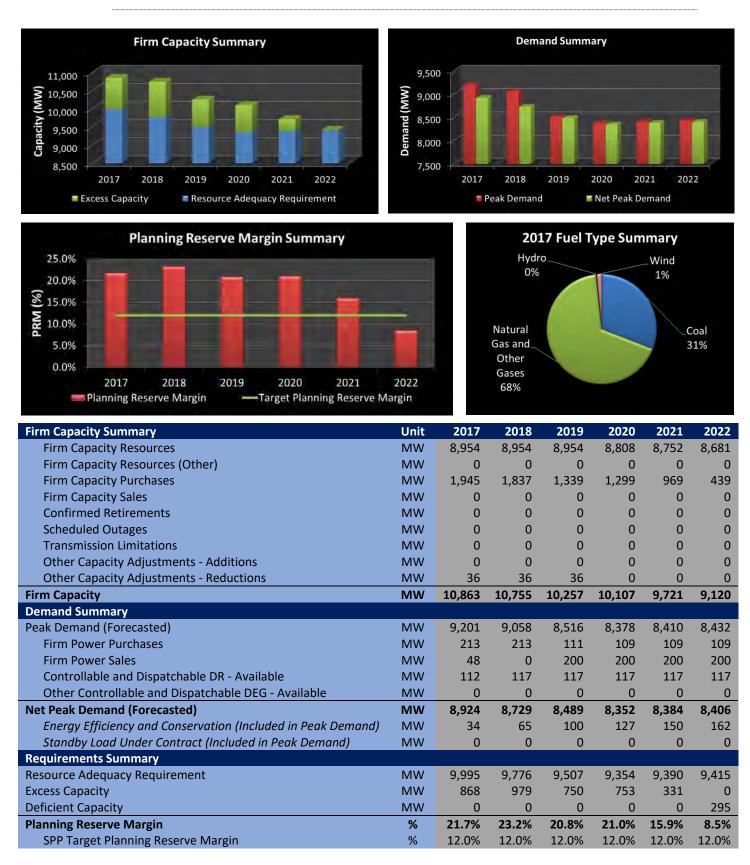


# LOAD RESPONSIBLE ENTITIES

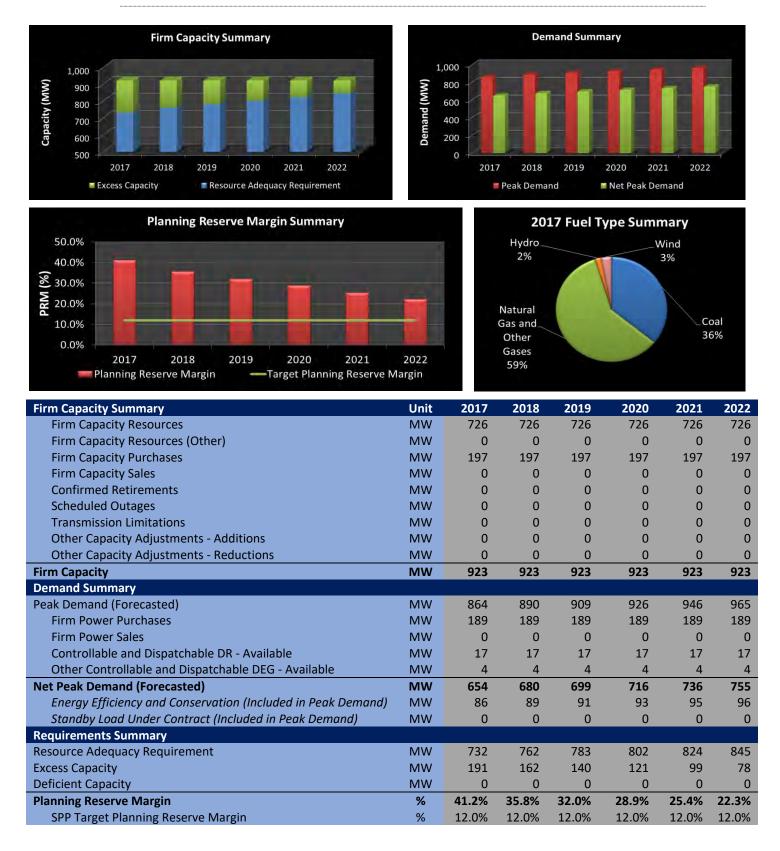
American Electric Power Arkansas Electric Cooperative Corporation **Basin Electric Power Cooperative** Carthage Water & Electric Plant (Did not meet the RAR for the 2017 Summer Season) City of Beatrice Nebraska City of Chanute **City of Fremont** City of Grand Island Nebraska Utilities City of Hastings Nebraska Utilities City of Malden Board of Public Works City of Neligh City of Piggott Municipal Light & Water City of Poplar Bluff Municipal Utilities City of Superior Nebraska City of West Plains Board of Public Works City Utilities of Springfield **Empire District Electric Company** ETEC/NTEC/Tex-La **Falls City Utilities Golden Spread Electric Cooperative** Grand River Dam Authority Greater Missouri Operations Company (KCP&L) Harlan Municipal Utilities Heartland Consumers Power District Independence Power & Light Kansas City Board of Public Utilities Kansas City Power & Light Kansas Municipal Energy Agency – EMP1 Kansas Municipal Energy Agency – EMP2 Kansas Municipal Energy Agency – EMP3 Kansas Municipal Energy Agency - Eudora Kansas Municipal Energy Agency – GC Kansas Municipal Energy Agency - Meade **Kansas Power Pool** Kennett Board of Public Works Lincoln Electric System MidAmerican Energy Company **Midwest Energy Missouri Joint Municipal Electric Utility Commission Missouri River Energy Services** Municipal Energy Agency of Nebraska

Nebraska City Utilities Nebraska Public Power District Northwestern Energy NSP Energy Marketing (Not included due to all load being served with Firm Power contracts) Oklahoma Gas & Electric Company **Oklahoma Municipal Power Authority Omaha Public Power District** Paragould Light and Water Commission (Not included due to all load being served with Firm Power contracts) People's Electric Cooperative South Sioux City Nebraska Southwestern Power Administration Southwestern Public Service Company Sunflower Electric Power Corporation West Texas Municipals Westar Energy Western Area Power Administration Western Farmers Energy Services

# AMERICAN ELECTRIC POWER

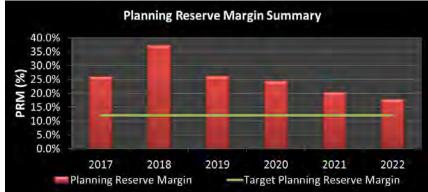


# ARKANSAS ELECTRIC COOPERATIVE CORPORATION

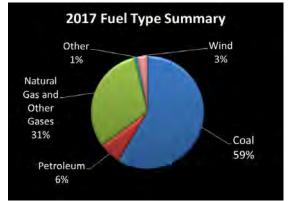


# BASIN ELECTRIC POWER COOPERATIVE





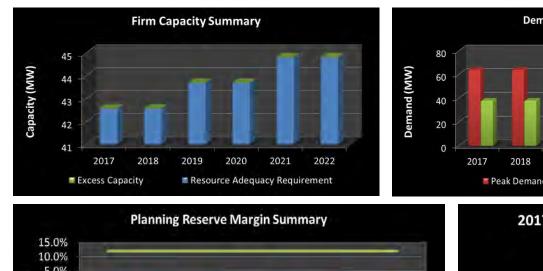




Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	3,250	3,416	3,207	3,208	3,208	3,208
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	66	218	221	221	170	170
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	3,316	3,634	3,428	3,429	3,378	3,378
Demand Summary							
Peak Demand (Forecasted)	MW	2,768	2,795	2,863	2,903	2,953	2,993
Firm Power Purchases	MW	240	240	240	240	240	240
Firm Power Sales	MW	110	98	100	99	100	115
Controllable and Dispatchable DR - Available	MW	6	6	6	6	6	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	2,631	2,646	2,717	2,756	2,807	2,868
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	2,947	2,964	3,043	3,086	3,144	3,212
Excess Capacity	MW	369	670	384	343	234	165
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	26.0%	37.3%	26.1%	24.4%	20.3%	17.8%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

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### **CARTHAGE WATER & ELECTRIC PLANT**





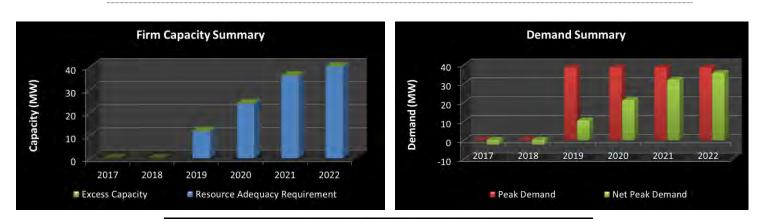


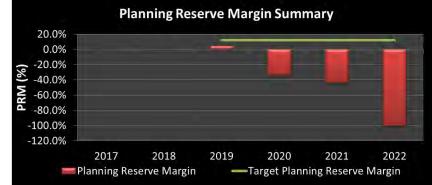
### 2017 Fuel Type Summary



Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	0	0	0	0	0	0
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	32	32	32	32	32	32
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	32	32	32	32	32	32
Demand Summary							
Peak Demand (Forecasted)	MW	64	64	65	65	66	66
Firm Power Purchases	MW	7	7	7	7	7	7
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	19	19	19	19	19	19
Net Peak Demand (Forecasted)	MW	38	38	39	39	40	40
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	43	43	44	44	45	45
Excess Capacity	MW	0	0	0	0	0	0
Deficient Capacity	MW	11	11	12	12	13	13
Planning Reserve Margin	%	-15.8%	-15.8%	-17.9%	-17.9%	-20.0%	-20.0%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

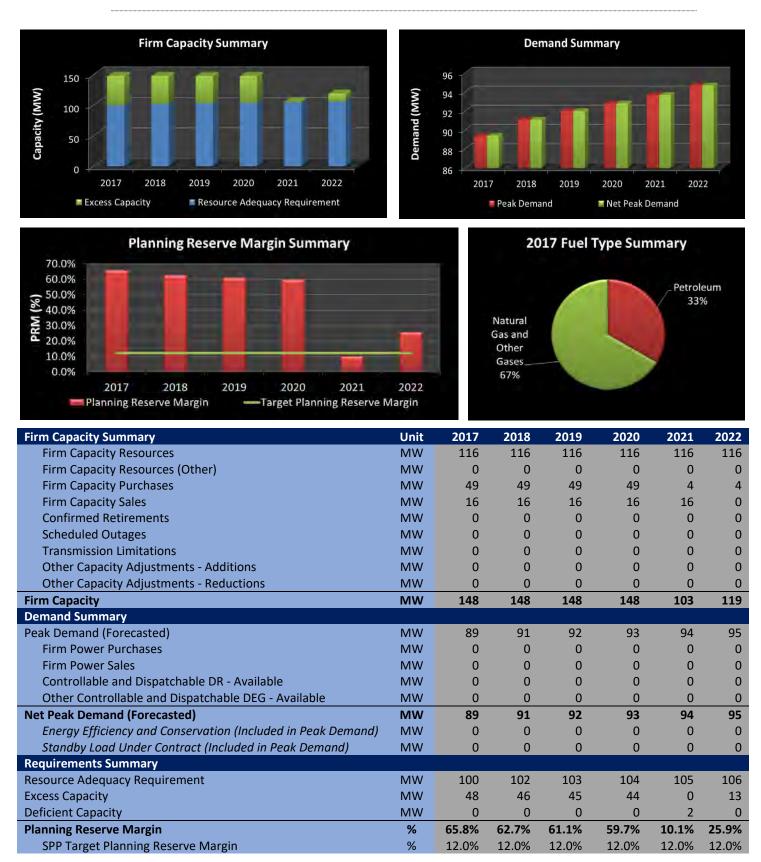
### CITY OF BEATRICE NEBRASKA



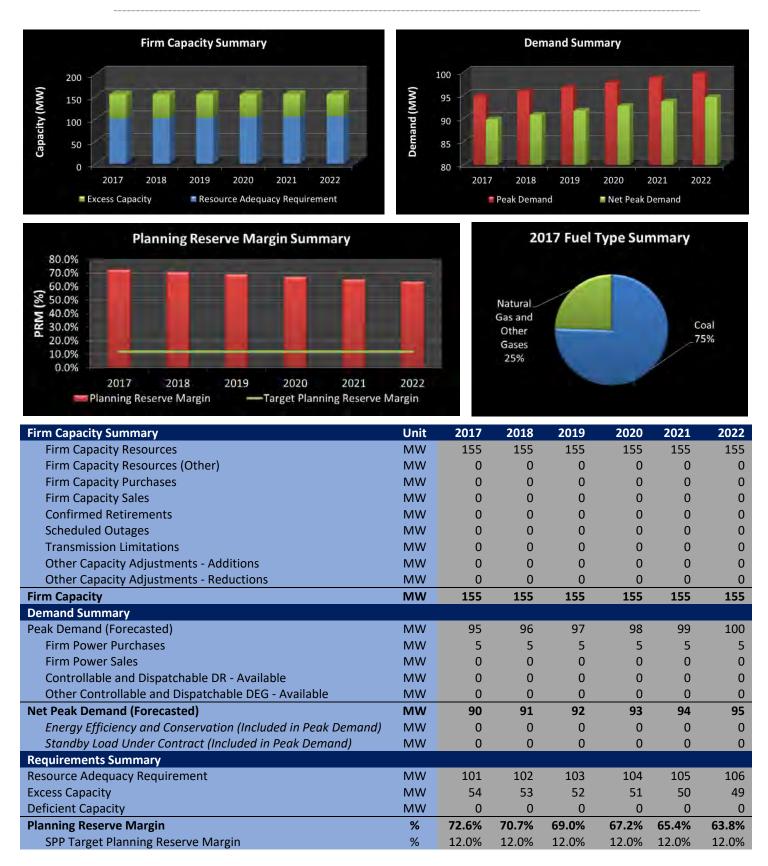


Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	0	0	0	0	0	0
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	11	14	18	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	0	0	11	14	18	0
Demand Summary							
Peak Demand (Forecasted)	MW	0	0	39	39	39	39
Firm Power Purchases	MW	3	3	28	17	6	3
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	-3	-3	11	21	32	36
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW			12	24	36	40
Excess Capacity	MW			0	0	0	0
Deficient Capacity	MW			1	10	18	40
Planning Reserve Margin	%			4.8%	-34.3%	-43.9%	-100.0%
SPP Target Planning Reserve Margin	%			12.0%	12.0%	12.0%	12.0%

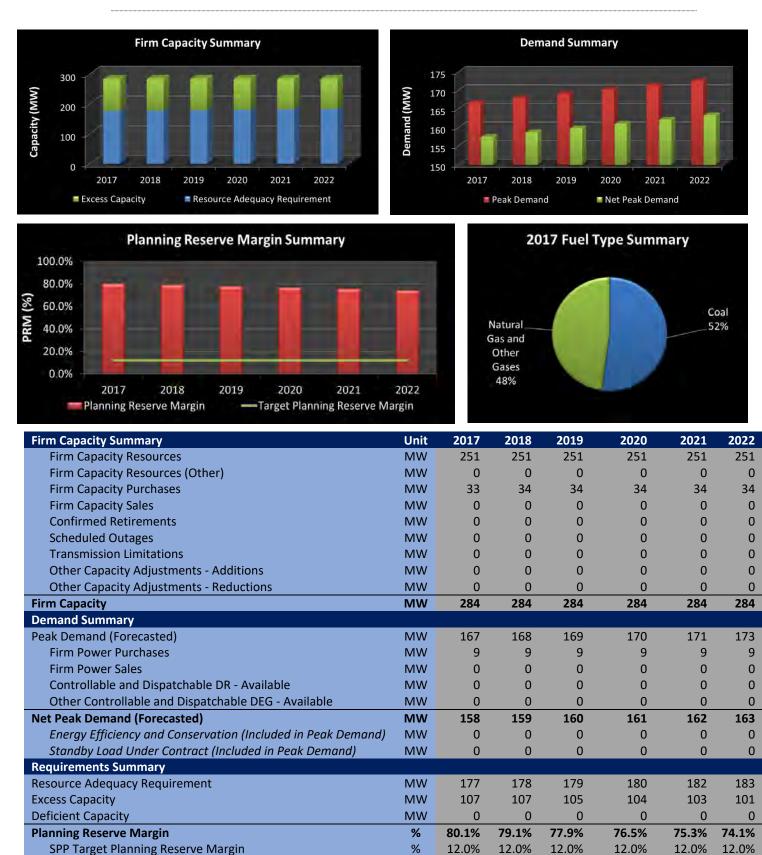
### **CITY OF CHANUTE**



### CITY OF FREMONT



# CITY OF GRAND ISLAND NEBRASKA UTILITIES

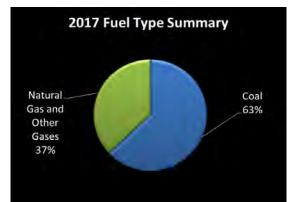


# CITY OF HASTINGS NEBRASKA UTILITIES





# Demand Summary



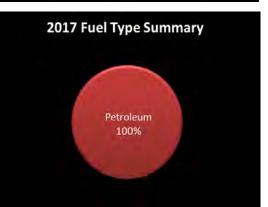
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	160	165	165	165	165	165
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	160	165	165	165	165	165
Demand Summary							
Peak Demand (Forecasted)	MW	93	94	96	97	98	99
Firm Power Purchases	MW	12	12	12	12	12	12
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	81	82	84	85	86	87
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	91	92	94	95	96	98
Excess Capacity	MW	70	73	72	71	69	68
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	97.8%	101.0%	98.1%	95.3%	92.5%	89.7%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

## CITY OF MALDEN BOARD OF PUBLIC WORKS









Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	16	16	16	16	16	16
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	16	16	16	16	16	16
Demand Summary							
Peak Demand (Forecasted)	MW	12	12	12	12	12	12
Firm Power Purchases	MW	5	5	5	5	5	5
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	7	7	7	7	7	7
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	7	7	7	8	8	8
Excess Capacity	MW	9	9	9	8	8	8
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	146.2%	146.2%	142.4%	138.8%	135.3%	128.6%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# CITY OF NELIGH

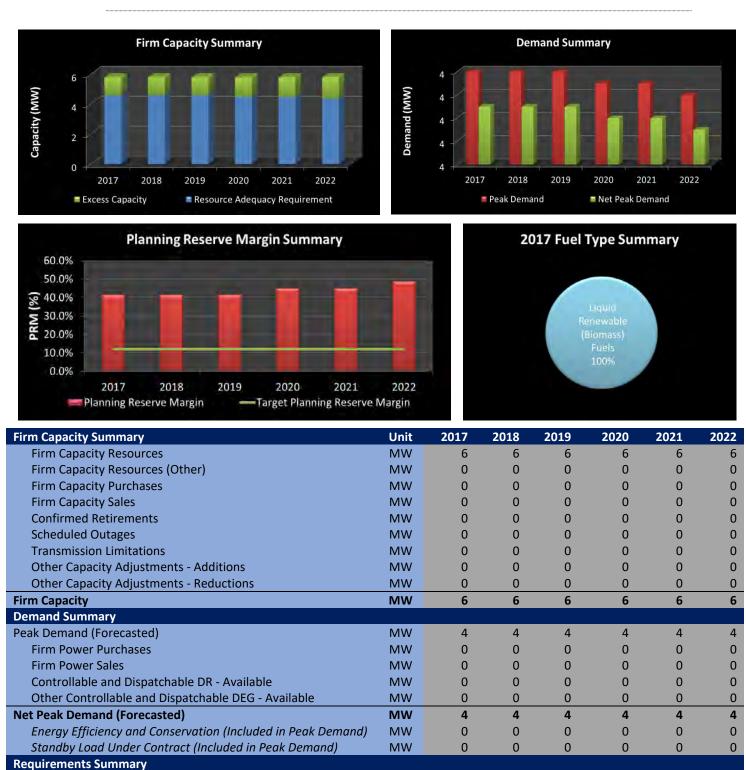
**Resource Adequacy Requirement** 

SPP Target Planning Reserve Margin

**Excess Capacity** 

**Deficient Capacity** 

**Planning Reserve Margin** 



MW

MW

MW

%

%

5

1

0

41.5%

12.0%

5

1

0

41.5%

12.0%

5

1

0

41.5%

12.0%

4

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0

45.0%

12.0%

4

1

0

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12.0%

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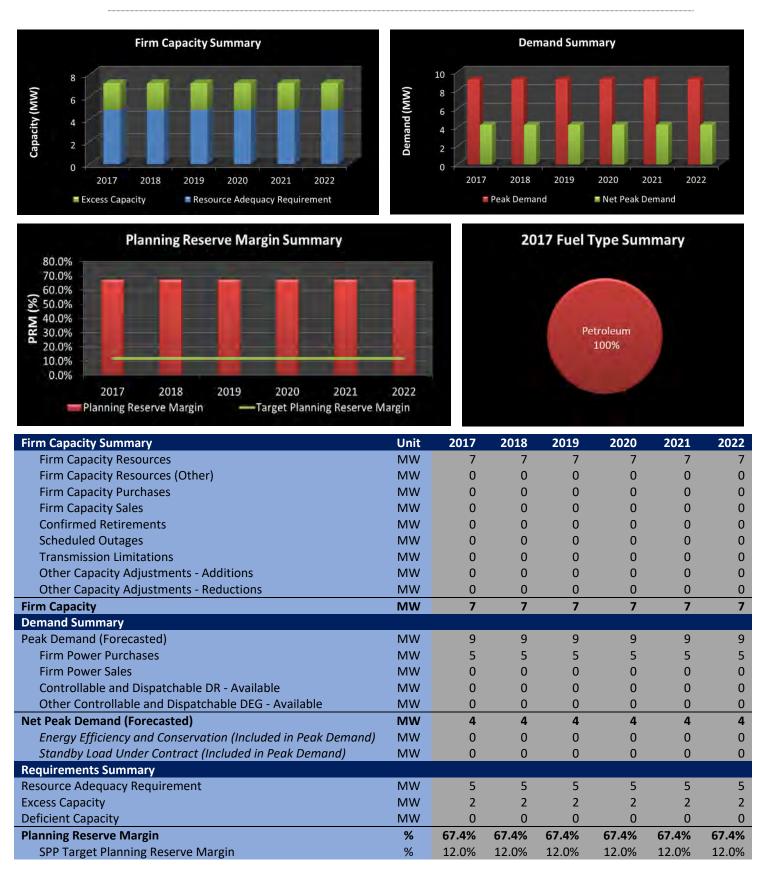
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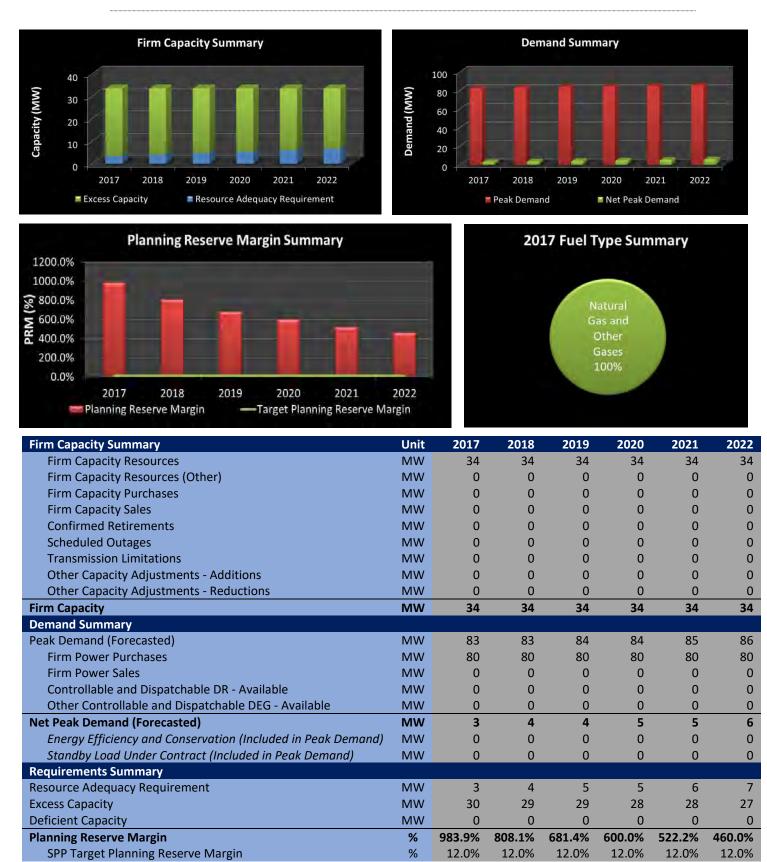
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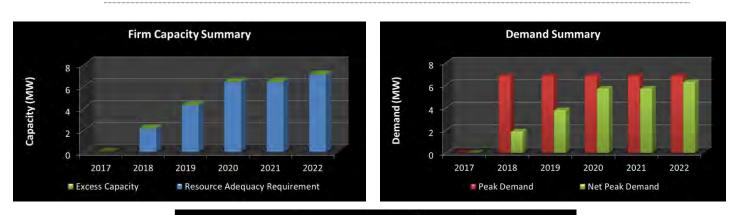
# CITY OF PIGGOTT MUNICIPAL LIGHT & WATER



# CITY OF POPLAR BLUFF MUNICIPAL UTILITIES



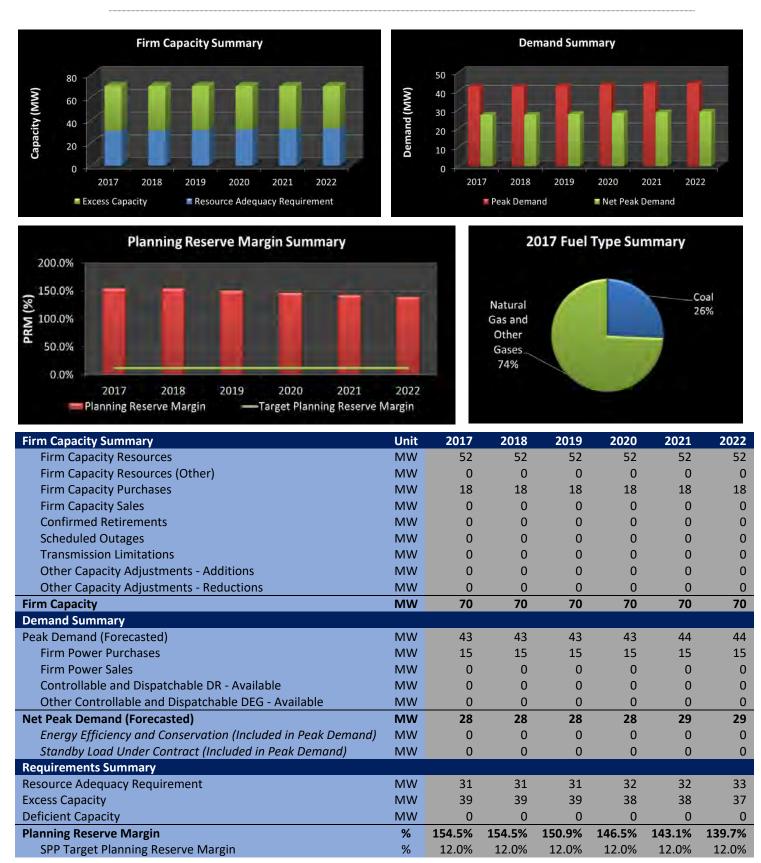
# CITY OF SUPERIOR NEBRASKA





Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	0	0	0	0	0	0
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	0	0	0	0	0	0
Demand Summary							
Peak Demand (Forecasted)	MW	0	7	7	7	7	7
Firm Power Purchases	MW	0	5	3	1	1	1
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	0	2	4	6	6	6
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW		2	4	6	6	7
Excess Capacity	MW		0	0	0	0	0
Deficient Capacity	MW		2	4	6	6	7
Planning Reserve Margin	%		-100.0%	-100.0%	-100.0%	-100.0%	-100.0%
SPP Target Planning Reserve Margin	%		12.0%	12.0%	12.0%	12.0%	12.0%

## CITY OF WEST PLAINS BOARD OF PUBLIC WORKS

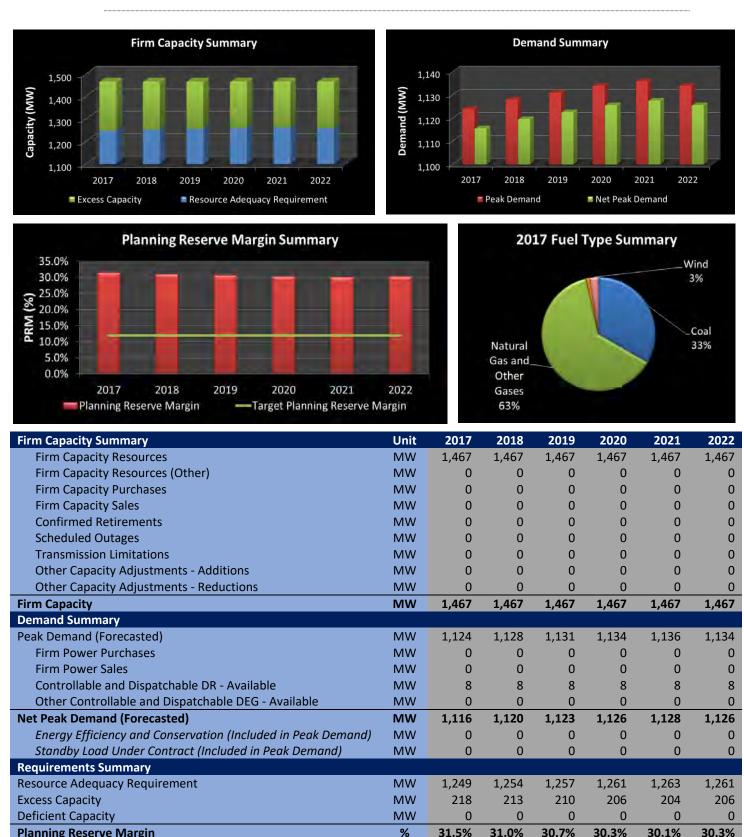


### CITY UTILITIES OF SPRINGFIELD



Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	714	714	715	715	715	715
Energy Efficiency and Conservation (Included in Peak Demand)	MW	8	9	9	10	10	11
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	799	799	800	800	800	800
Excess Capacity	MW	131	201	47	77	77	77
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	30.3%	40.1%	18.5%	22.7%	22.7%	22.7%
CDD Target Diagning Deserve Margin	0/	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.070	12.070	12.0/0	12.070

### EMPIRE DISTRICT ELECTRIC COMPANY



31.5%

12.0%

12.0%

12.0%

%

**Planning Reserve Margin** 

SPP Target Planning Reserve Margin

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30.3%

12.0%

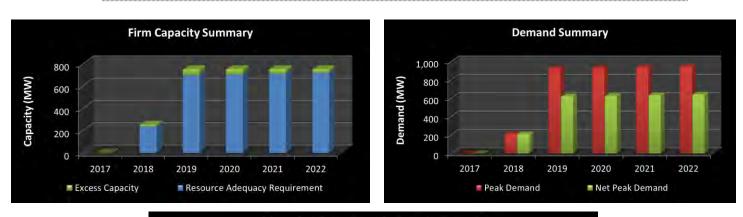
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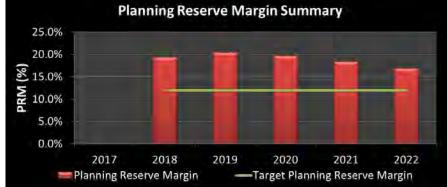
12.0%

30.3%

12.0%

### ETEC/NTEC/TEX-LA



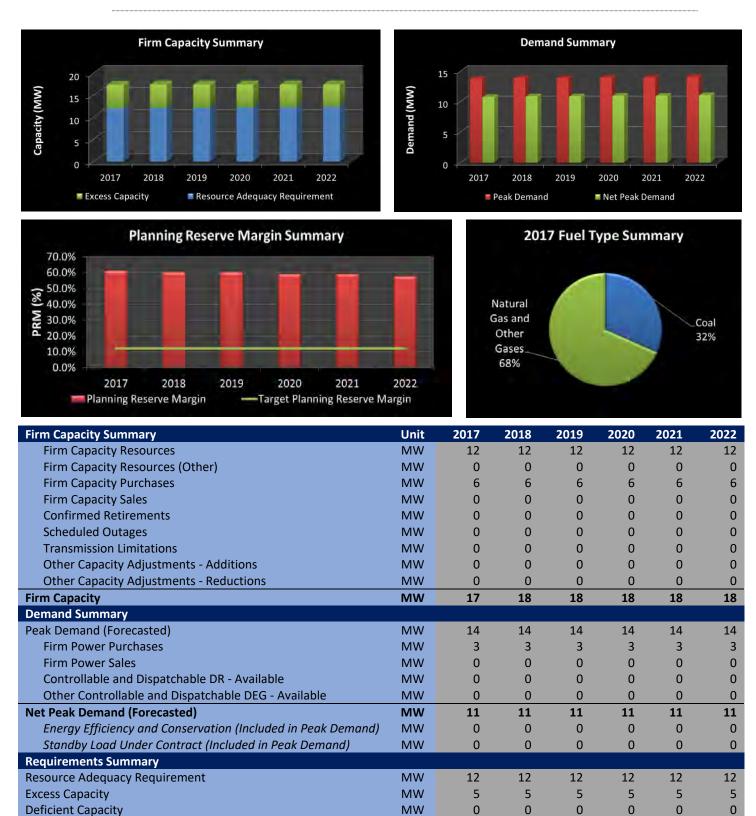


Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	685	685	685	685	685	685
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	66	66	66	66	66	66
Firm Capacity Sales	MW	606	498	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	144	252	750	750	750	750
Demand Summary							
Peak Demand (Forecasted)	MW	0	212	925	929	936	944
Firm Power Purchases	MW	102	102	302	302	302	302
Firm Power Sales	MW	102	102	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	0	212	623	627	634	642
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW		237	698	702	710	719
Excess Capacity	MW		16	53	48	40	31
Deficient Capacity	MW		0	0	0	0	0
Planning Reserve Margin	%		19.3%	20.4%	19.7%	18.4%	16.9%
SPP Target Planning Reserve Margin	%		12.0%	12.0%	12.0%	12.0%	12.0%

### FALLS CITY UTILITIES

**Planning Reserve Margin** 

SPP Target Planning Reserve Margin



%

%

61.1%

12.0%

60.6%

12.0%

60.6%

12.0%

59.1%

12.0%

59.1%

12.0%

57.7%

12.0%

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# **GOLDEN SPREAD ELECTRIC COOPERATIVE**





### **Demand Summary** 1,450 Demand (MW) 1,400 1,350 1,300 1,250 1,200 2017 2018 2019 2020 2022 2021 Peak Demand Net Peak Demand





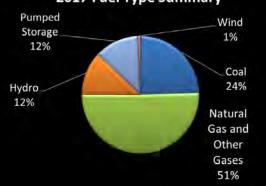
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	1,494	1,549	1,549	1,549	1,549	1,549
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	1,494	1,549	1,549	1,549	1,549	1,549
Demand Summary							
Peak Demand (Forecasted)	MW	1,358	1,383	1,405	1,421	1,434	1,444
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	51	51	51	51	51	51
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	1,307	1,332	1,354	1,370	1,383	1,393
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	1,463	1,491	1,516	1,534	1,549	1,560
Excess Capacity	MW	31	58	33	16	0	0
Deficient Capacity	MW	0	0	0	0	0	11
Planning Reserve Margin	%	14.4%	16.4%	14.4%	13.1%	12.0%	11.2%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

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# GRAND RIVER DAM AUTHORITY

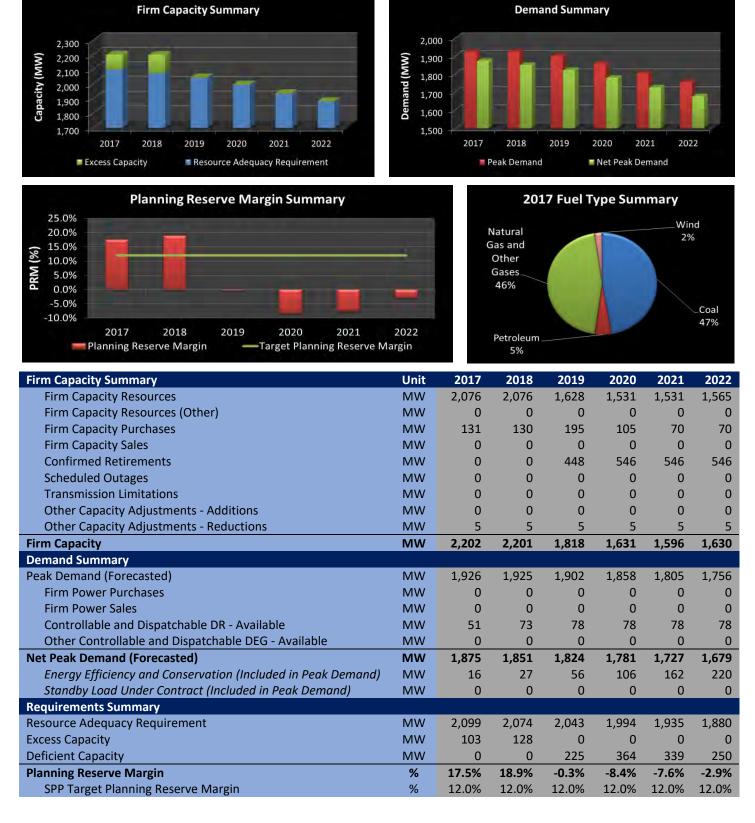


40.0% 30.0% 20.0% -				- 11 -		-		
	-							
10.0% -								
0.0%								
	2017	2018	2019	2020	2021	2022		
- F	Planning Reserve Margin			-Target Planning Reserve Margin				

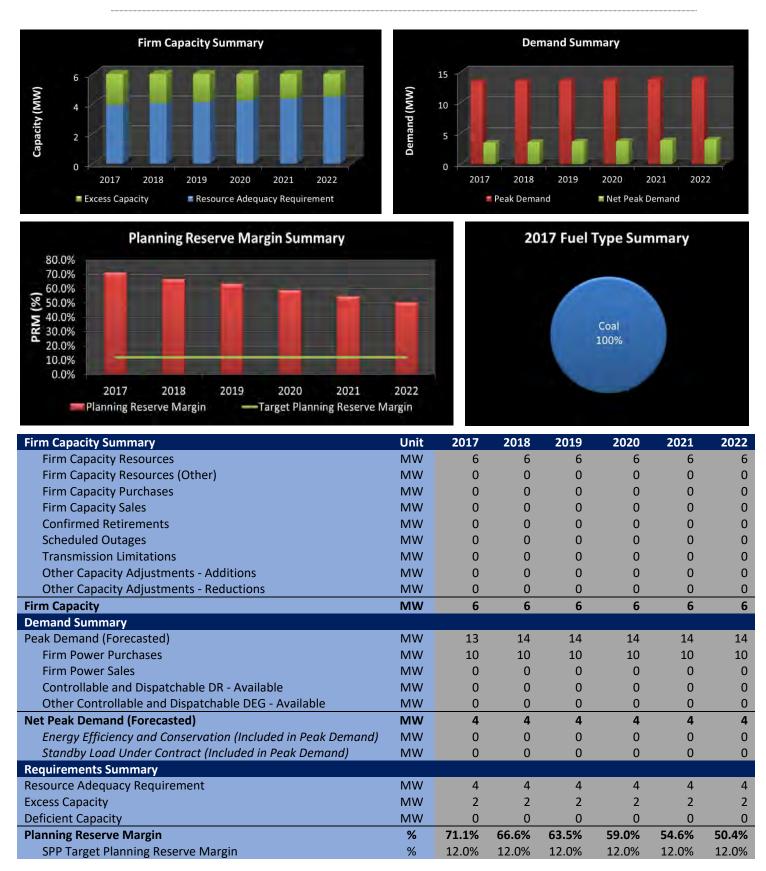


	11	2017	2010	2040	2020	2024	2022
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	2,121	2,121	2,121	2,121	2,121	2,121
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	0	20	20	20	20	20
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	520	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	55	0	0	0	0	0
Firm Capacity	MW	1,546	2,101	2,101	2,101	2,101	2,101
Demand Summary							
Peak Demand (Forecasted)	MW	970	1,002	1,063	1,123	1,183	1,244
Firm Power Purchases	MW	13	13	13	13	13	13
Firm Power Sales	MW	442	442	442	442	442	442
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	30	30	30	30	30	30
Net Peak Demand (Forecasted)	MW	1,369	1,401	1,462	1,522	1,582	1,643
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	1,534	1,570	1,638	1,705	1,772	1,841
Excess Capacity	MW	12	531	463	396	328	260
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	12.9%	49.9%	43.6%	38.0%	32.7%	27.8%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

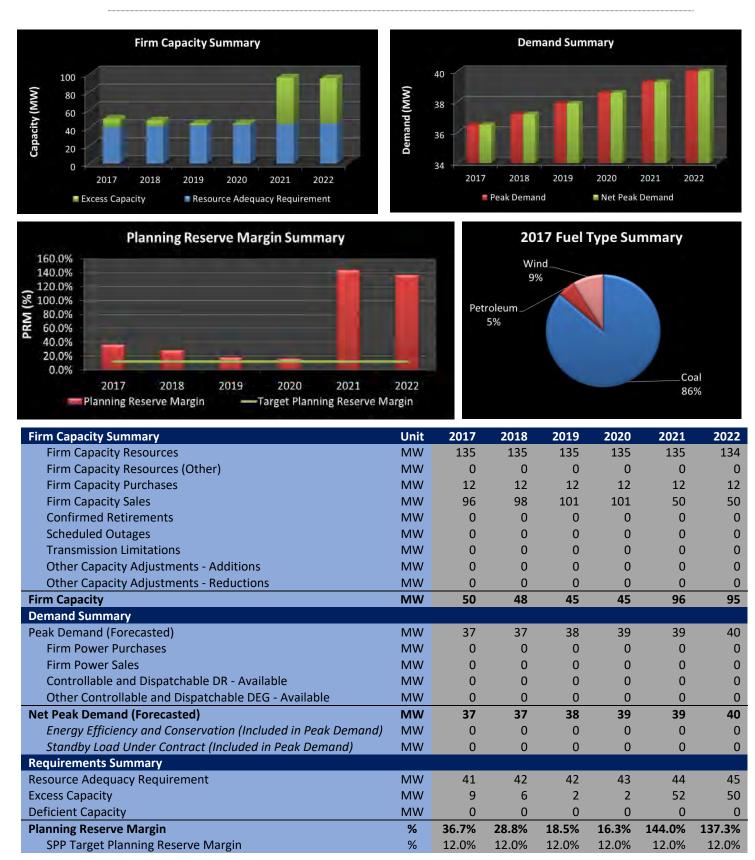
# GREATER MISSOURI OPERATIONS COMPANY (KCP&L)



# HARLAN MUNICIPAL UTILITIES



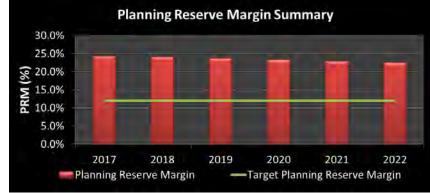
# HEARTLAND CONSUMERS POWER DISTRICT

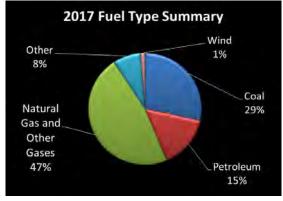


# **INDEPENDENCE POWER & LIGHT**



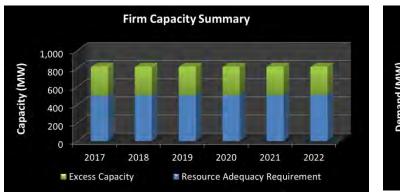




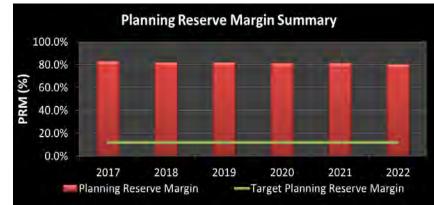


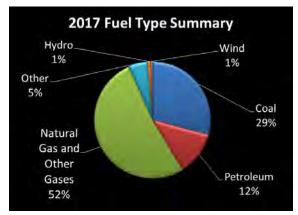
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	268	268	268	268	268	268
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	113	114	114	114	114	114
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	381	382	382	382	382	382
Demand Summary							
Peak Demand (Forecasted)	MW	307	308	309	310	311	312
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	307	308	309	310	311	312
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	344	345	346	347	349	350
Excess Capacity	MW	38	37	36	35	34	33
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	24.3%	24.2%	23.7%	23.3%	22.9%	22.5%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# KANSAS CITY BOARD OF PUBLIC UTILITIES







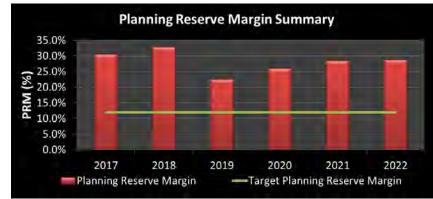


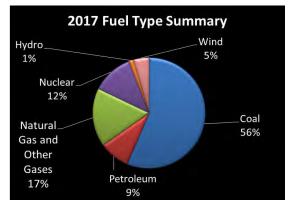
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	810	810	810	810	810	810
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	11	11	11	11	11	11
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	821	821	821	821	821	821
Demand Summary							
Peak Demand (Forecasted)	MW	492	494	494	496	496	498
Firm Power Purchases	MW	43	43	43	43	43	43
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	449	451	451	453	453	455
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	502	505	505	507	507	509
Excess Capacity	MW	318	316	316	314	314	311
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	82.9%	82.1%	82.1%	81.3%	81.3%	80.5%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# **KANSAS CITY POWER & LIGHT**









Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	4,344	4,344	4,010	4,010	4,010	4,010
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	256	292	292	292	292	292
Firm Capacity Sales	MW	137	112	167	77	15	15
Confirmed Retirements	MW	0	0	334	334	334	334
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	4,463	4,524	4,135	4,225	4,287	4,287
Demand Summary							
Peak Demand (Forecasted)	MW	3,440	3,441	3,434	3,419	3,390	3,380
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	20	34	55	64	51	51
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	3,420	3,407	3,379	3,355	3,339	3,329
Energy Efficiency and Conservation (Included in Peak Demand)	MW	18	35	54	75	112	141
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	3,831	3,816	3,784	3,757	3,740	3,729
Excess Capacity	MW	633	708	351	467	547	558
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	30.5%	32.8%	22.4%	25.9%	28.4%	28.8%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

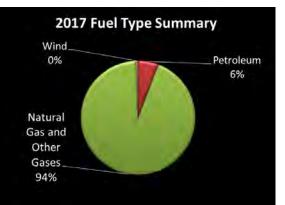
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# KANSAS MUNICIPAL ENERGY AGENCY – EMP1



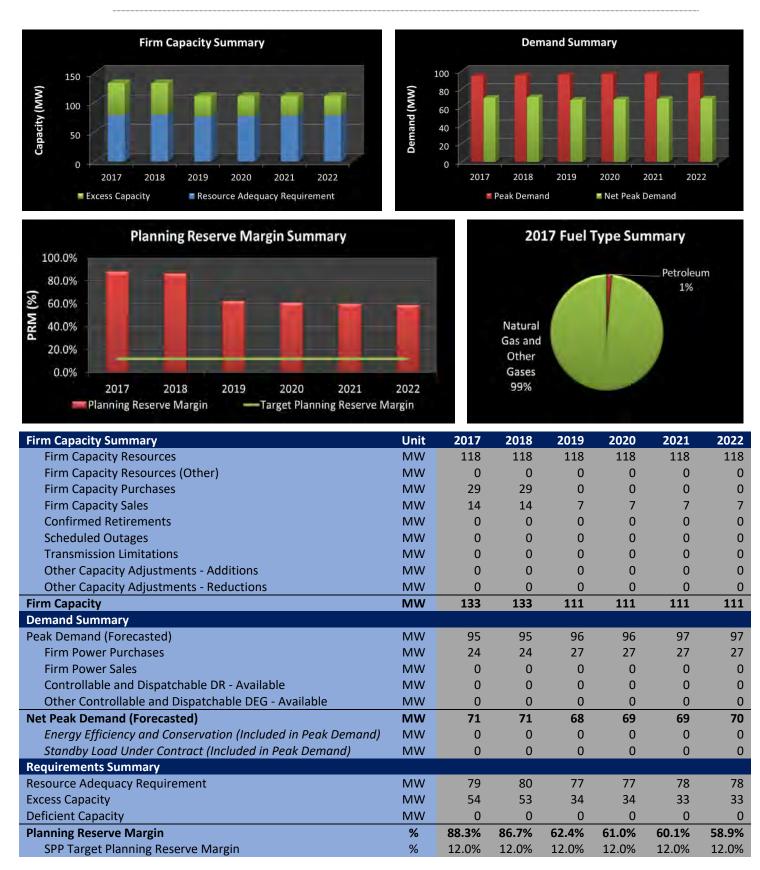




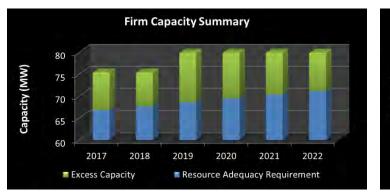


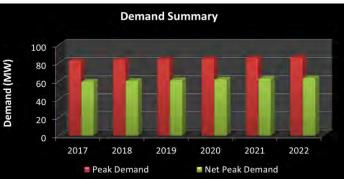
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	80	80	80	80	80	80
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	20	20	0	0	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	100	100	80	80	80	80
Demand Summary							
Peak Demand (Forecasted)	MW	105	106	107	108	109	109
Firm Power Purchases	MW	38	38	38	38	38	38
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	67	68	69	70	70	71
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	75	76	77	78	79	80
Excess Capacity	MW	25	24	3	2	1	0
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	49.6%	47.6%	16.5%	15.0%	13.5%	12.2%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# KANSAS MUNICIPAL ENERGY AGENCY – EMP2

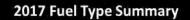


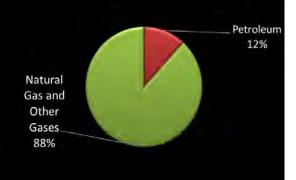
# KANSAS MUNICIPAL ENERGY AGENCY – EMP3











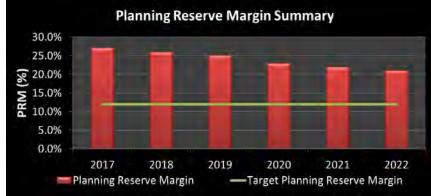
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	80	80	80	80	80	80
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	5	5	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	75	75	80	80	80	80
Demand Summary							
Peak Demand (Forecasted)	MW	82	83	84	85	86	86
Firm Power Purchases	MW	23	23	23	23	23	23
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	60	60	61	62	63	64
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	67	68	69	69	70	71
Excess Capacity	MW	9	8	11	10	10	9
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	26.4%	24.8%	30.5%	28.8%	27.2%	25.7%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

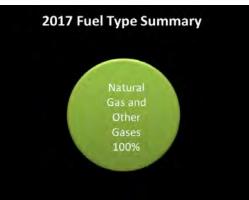
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# KANSAS MUNICIPAL ENERGY AGENCY – EUDORA





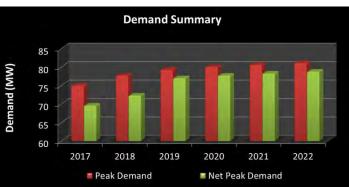




Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	0	0	0	0	0	0
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	15	15	15	15	15	15
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	15	15	15	15	15	15
Demand Summary							
Peak Demand (Forecasted)	MW	12	13	13	13	13	13
Firm Power Purchases	MW	1	1	1	1	1	1
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	12	12	12	12	12	12
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	13	13	13	14	14	14
Excess Capacity	MW	2	2	2	1	1	1
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	27.1%	26.1%	25.0%	23.0%	22.0%	21.0%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# KANSAS MUNICIPAL ENERGY AGENCY – GC











Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	27	27	27	27	27	27
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	52	37	27	27	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	79	64	54	54	27	27
Demand Summary							
Peak Demand (Forecasted)	MW	75	78	79	80	81	81
Firm Power Purchases	MW	5	5	2	2	2	2
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	70	72	77	78	78	79
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	78	81	86	87	88	88
Excess Capacity	MW	1	0	0	0	0	0
Deficient Capacity	MW	0	17	32	33	60	61
Planning Reserve Margin	%	13.8%	-11.2%	-29.6%	-30.2%	-65.3%	-65.5%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# KANSAS MUNICIPAL ENERGY AGENCY – MEADE





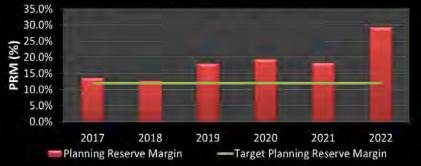
# Demand Summary

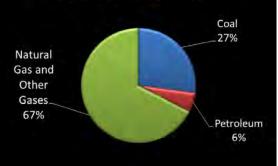


Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	7	7	7	7	7	7
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	0	0	0	0
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	7	7	7	7	7	7
Demand Summary							
Peak Demand (Forecasted)	MW	5	5	5	5	5	5
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	5	5	5	5	5	5
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	5	5	5	5	5	5
Excess Capacity	MW	1	1	1	1	1	1
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	44.4%	44.4%	44.4%	44.4%	44.4%	44.4%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# KANSAS POWER POOL

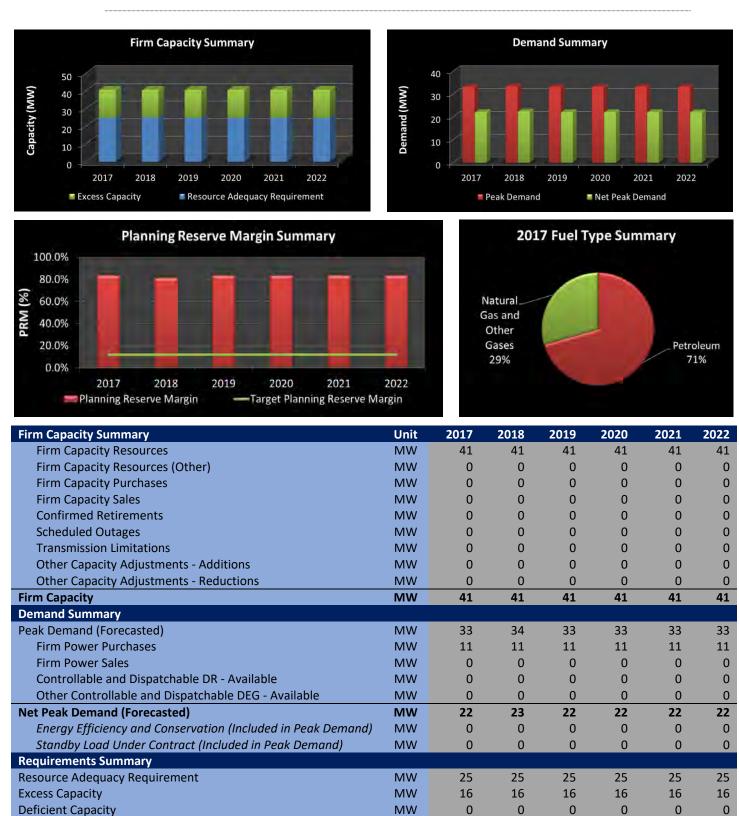






Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	209	209	209	209	209	209
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	59	59	59	59	59	59
Firm Capacity Sales	MW	50	50	25	25	25	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	218	218	243	243	243	268
Demand Summary							
Peak Demand (Forecasted)	MW	215	217	229	227	229	231
Firm Power Purchases	MW	24	24	24	24	24	24
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	192	193	206	203	205	207
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	215	216	230	228	230	232
Excess Capacity	MW	3	1	12	15	13	36
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	13.6%	12.7%	18.0%	19.4%	<b>18.2%</b>	29.3%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# KENNETT BOARD OF PUBLIC WORKS



%

%

83.3%

12.0%

80.9%

12.0%

83.3%

12.0%

**Planning Reserve Margin** 

SPP Target Planning Reserve Margin

83.3%

12.0%

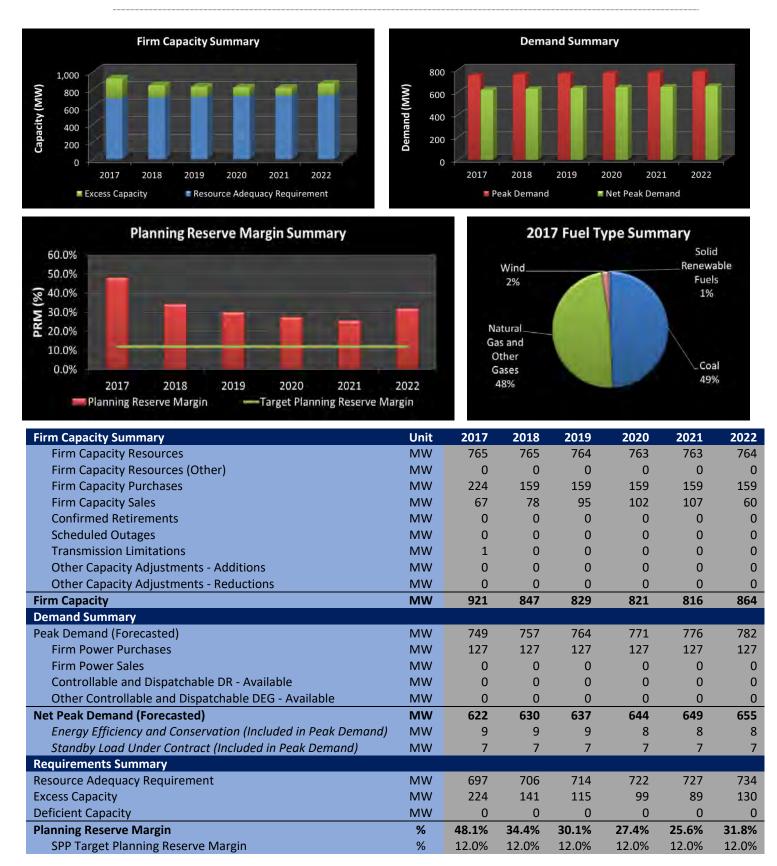
83.3%

12.0%

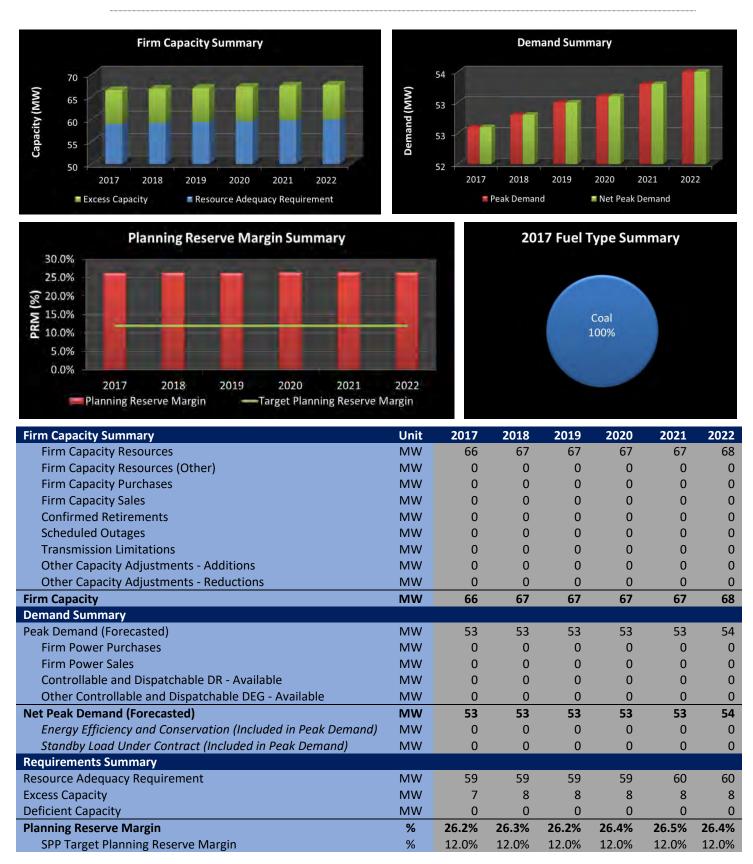
83.3%

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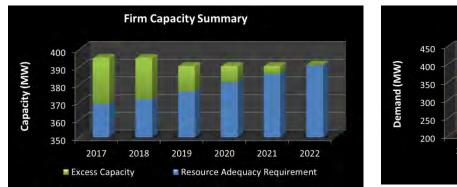
# LINCOLN ELECTRIC SYSTEM



# MIDAMERICAN ENERGY COMPANY

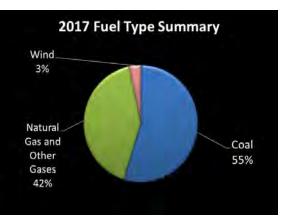


#### MIDWEST ENERGY







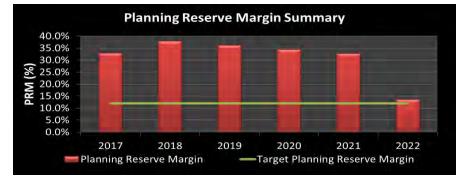


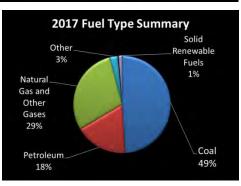
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	115	115	115	115	115	115
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	281	281	276	276	276	276
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	395	395	391	391	391	391
Demand Summary							
Peak Demand (Forecasted)	MW	391	393	398	403	407	411
Firm Power Purchases	MW	6	6	6	6	6	6
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	23	23	24	24	24	24
Other Controllable and Dispatchable DEG - Available	MW	33	33	33	33	33	33
Net Peak Demand (Forecasted)	MW	330	332	336	341	345	349
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	369	372	376	381	386	391
Excess Capacity	MW	26	23	14	9	5	0
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	19.9%	19.0%	16.3%	14.7%	13.3%	11.9%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION



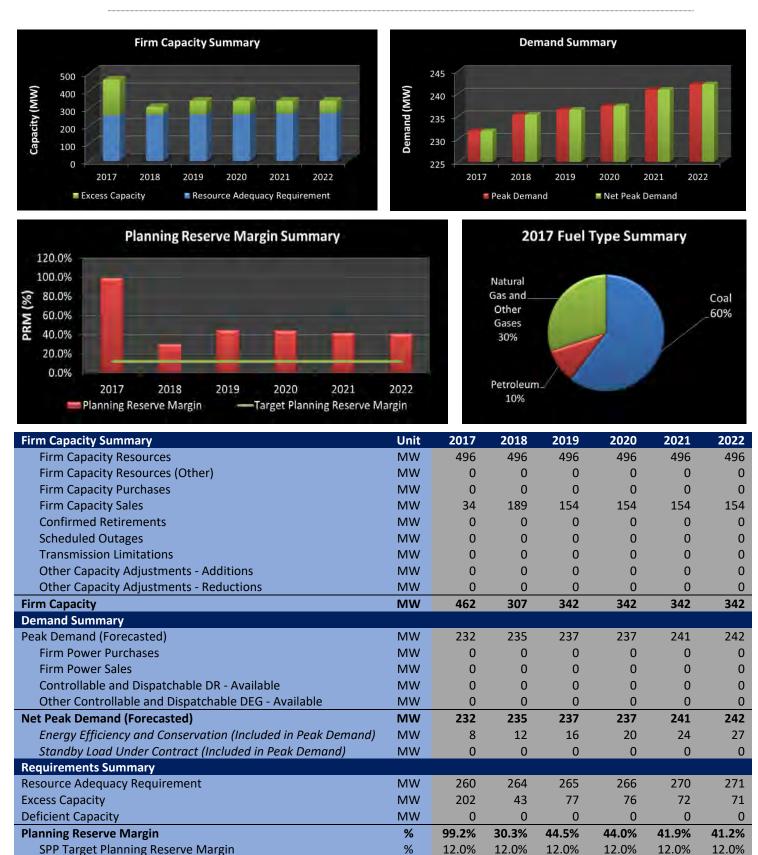




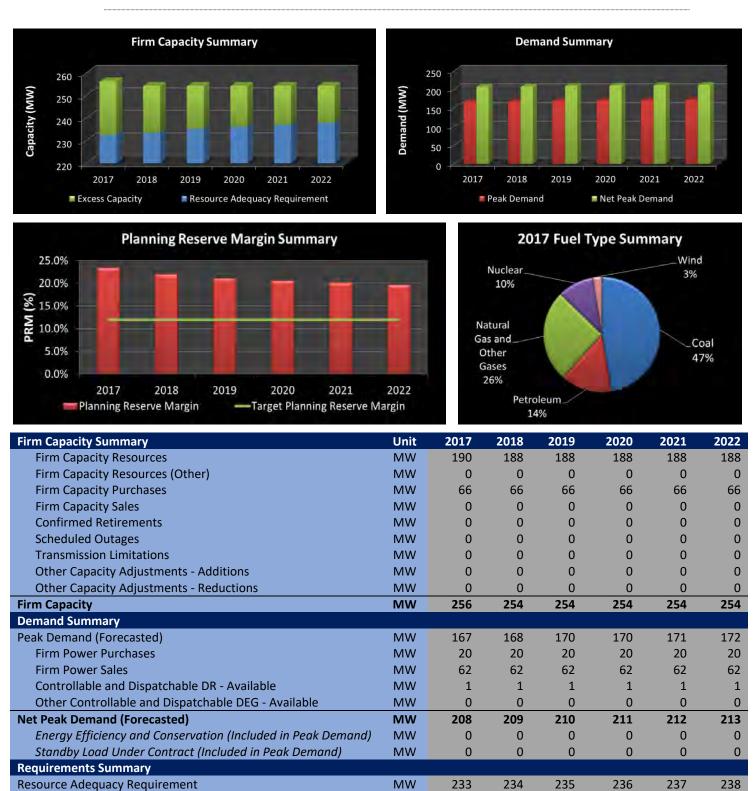


Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	590	590	590	590	590	590
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	206	208	208	208	208	108
Firm Capacity Sales	MW	88	53	53	53	53	53
Confirmed Retirements	MW	16	16	16	16	16	16
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	708	745	745	745	745	645
Demand Summary							
Peak Demand (Forecasted)	MW	557	564	571	578	585	593
Firm Power Purchases	MW	24	24	24	24	24	24
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	534	541	548	555	562	569
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	598	605	613	621	629	637
Excess Capacity	MW	111	140	132	124	116	8
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	32.8%	37.9%	36.1%	34.4%	32.7%	13.5%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# MISSOURI RIVER ENERGY SERVICES



# MUNICIPAL ENERGY AGENCY OF NEBRASKA



MW

MW

%

%

24

23.4%

12.0%

0

21

22.0%

12.0%

0

19

21.1%

12.0%

0

**Excess Capacity** 

**Deficient Capacity** 

**Planning Reserve Margin** 

SPP Target Planning Reserve Margin

20.6%

12.0%

18

0

17

0

20.2%

12.0%

16

19.6%

12.0%

0

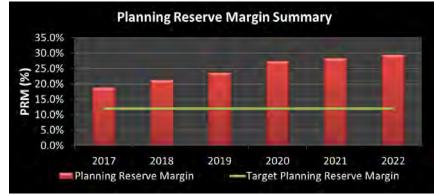
# NEBRASKA CITY UTILITIES

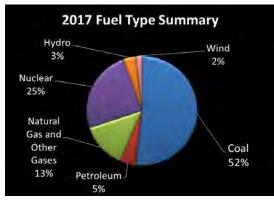


# NEBRASKA PUBLIC POWER DISTRICT



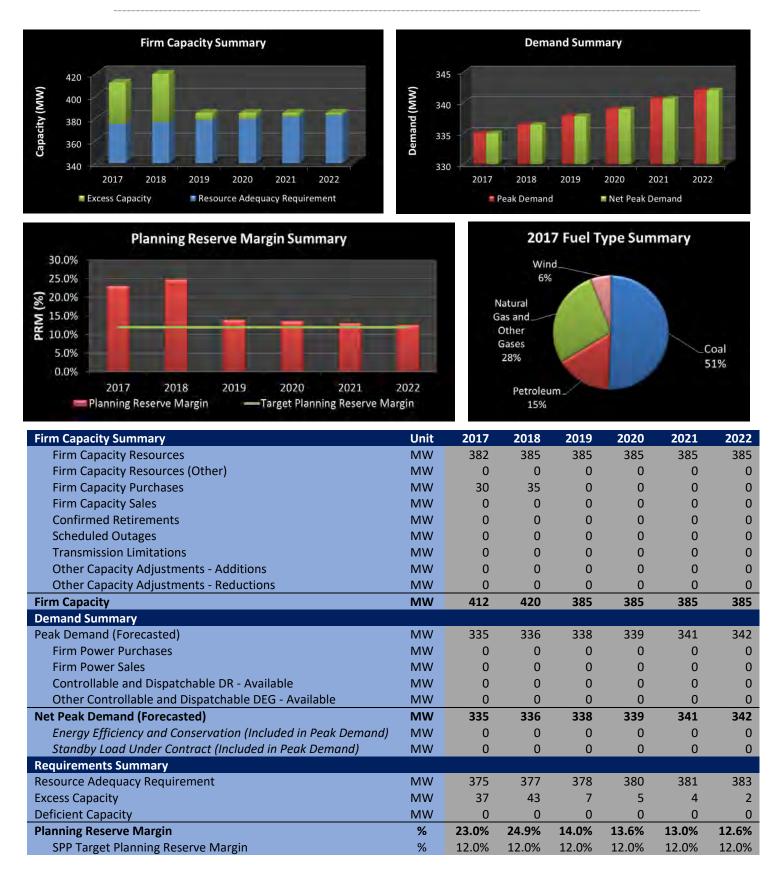




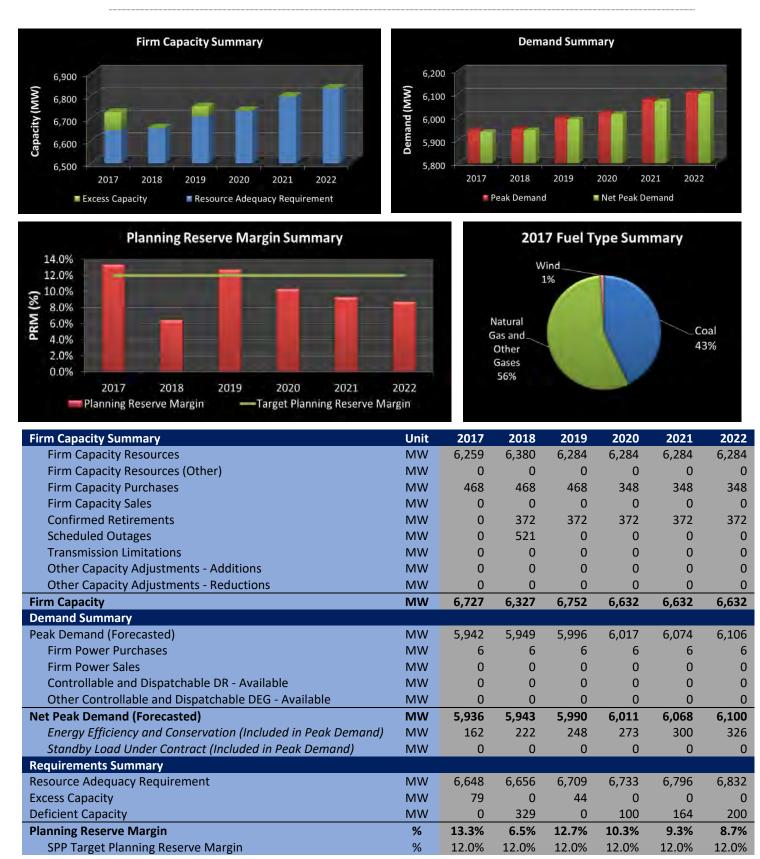


Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	3,072	3,077	3 <i>,</i> 054	3,054	3,054	3,053
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	195	198	198	198	198	198
Firm Capacity Sales	MW	281	191	166	166	166	166
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	10	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	2,976	3,083	3,086	3,086	3,086	3,084
Demand Summary							
Peak Demand (Forecasted)	MW	2,943	2,987	2,925	2,876	2,870	2,854
Firm Power Purchases	MW	473	473	473	473	473	473
Firm Power Sales	MW	35	29	42	19	8	1
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	2,506	2,543	2,493	2,421	2,405	2,381
Energy Efficiency and Conservation (Included in Peak Demand)	MW	4	7	10	13	17	20
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	2,806	2,848	2,792	2,712	2,693	2,667
Excess Capacity	MW	170	236	293	374	393	417
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	18.8%	21.3%	23.8%	27.4%	28.3%	29.5%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# NORTHWESTERN ENERGY



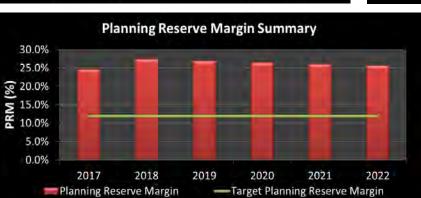
# **OKLAHOMA GAS & ELECTRIC COMPANY**



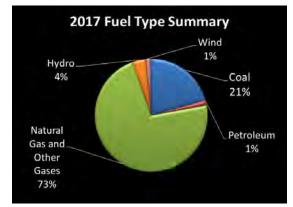
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# **OKLAHOMA MUNICIPAL POWER AUTHORITY**



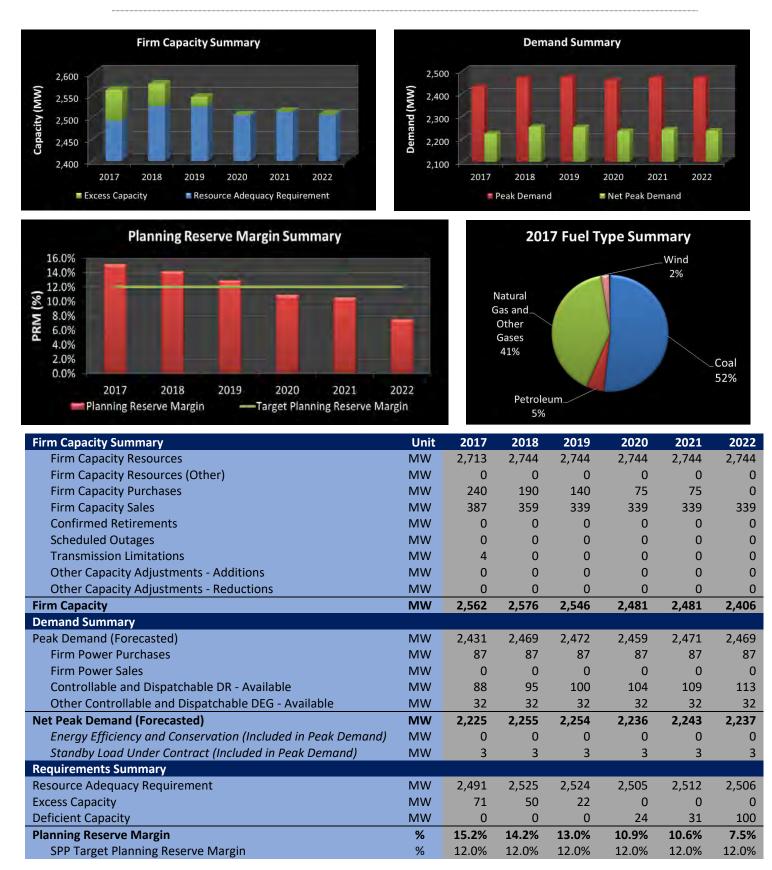




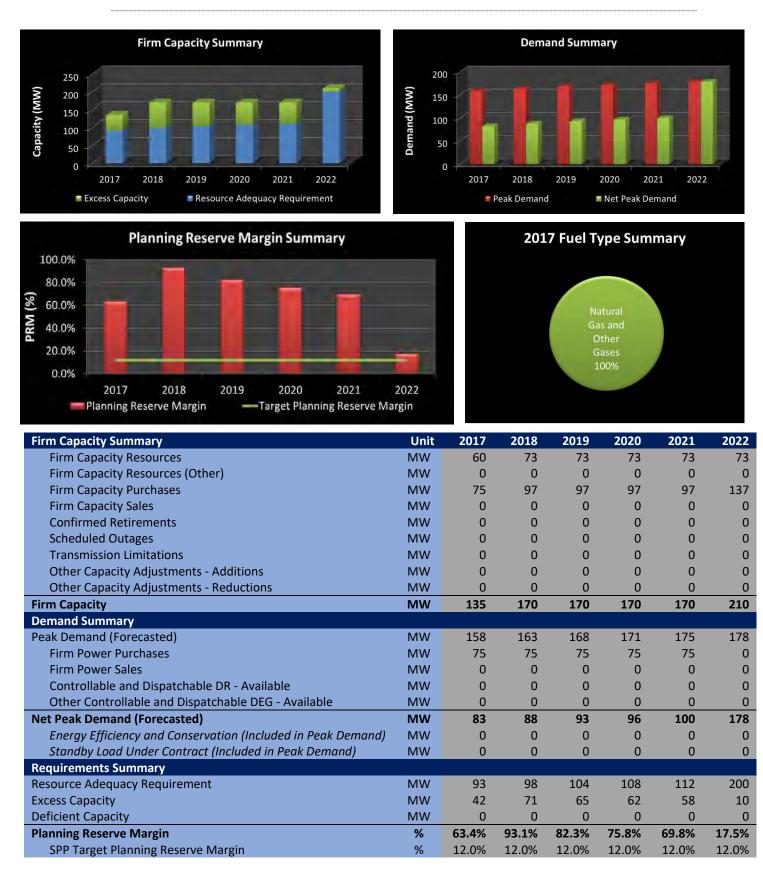


Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	713	713	713	713	713	713
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	59	79	79	79	79	79
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	772	792	792	792	792	792
Demand Summary							
Peak Demand (Forecasted)	MW	782	784	786	788	790	793
Firm Power Purchases	MW	162	162	162	162	162	162
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	620	622	624	626	628	631
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	694	696	699	701	704	706
Excess Capacity	MW	78	95	93	91	88	86
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	24.6%	27.4%	26.9%	26.5%	26.0%	25.6%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

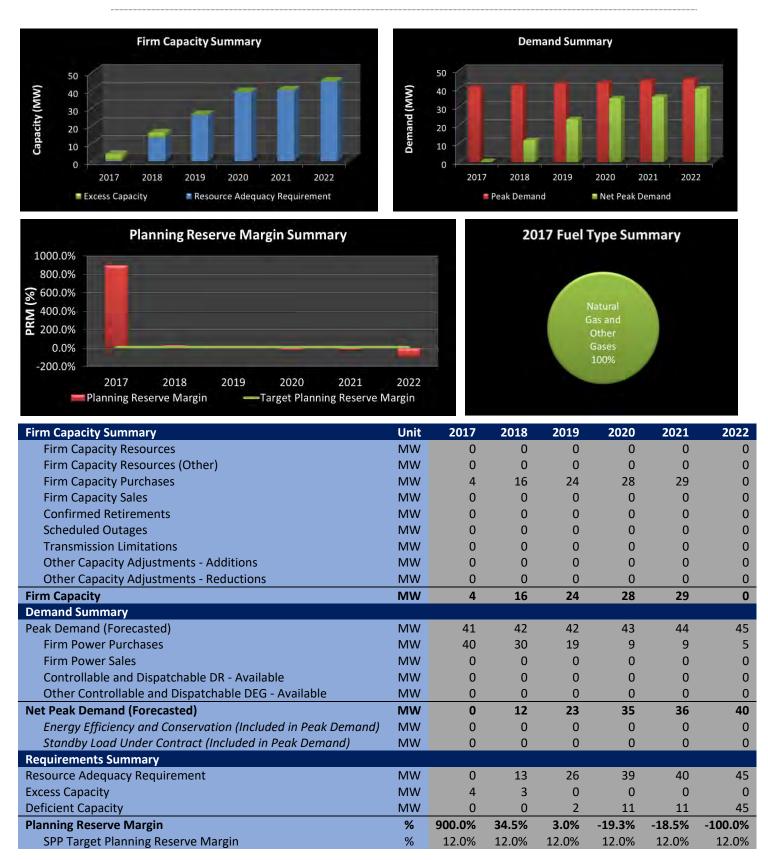
# OMAHA PUBLIC POWER DISTRICT



# PEOPLE'S ELECTRIC COOPERATIVE

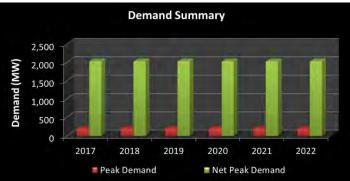


# SOUTH SIOUX CITY NEBRASKA

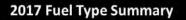


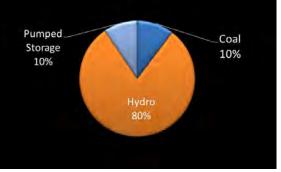
# SOUTHWESTERN POWER ADMINISTRATION











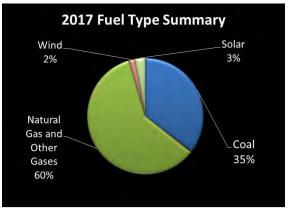
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	2,355	2,355	2,355	2,355	2,355	2,355
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	213	143	143	143	143	143
Firm Capacity Sales	MW	26	26	26	26	26	26
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	194	0	63	0	78	78
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	24	24	22	24	16	14
Firm Capacity	MW	2,325	2,449	2,388	2,449	2,379	2,381
Demand Summary							
Peak Demand (Forecasted)	MW	203	203	203	203	203	203
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	1,832	1,832	1,832	1,832	1,832	1,832
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	2,035	2,035	2,035	2,035	2,035	2,035
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	2,236	2,236	2,236	2,236	2,236	2,236
Excess Capacity	MW	88	213	151	213	143	145
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	14.2%	20.3%	17.3%	20.3%	16.9%	17.0%
SPP Target Planning Reserve Margin	%	9.89%	9.89%	9.89%	9.89%	9.89%	9.89%

# SOUTHWESTERN PUBLIC SERVICE COMPANY





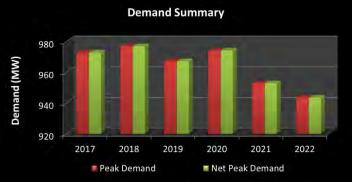




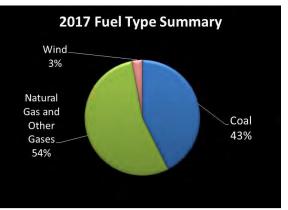
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	4,485	4,485	4,485	4,373	4,283	4,283
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	1,471	1,486	1,083	1,083	1,083	1,083
Firm Capacity Sales	MW	0	0	400	400	0	0
Confirmed Retirements	MW	0	0	0	112	202	202
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	5,956	5,971	5,168	5,056	5,366	5,366
Demand Summary							
Peak Demand (Forecasted)	MW	4,622	4,657	4,205	4,253	4,293	3,963
Firm Power Purchases	MW	171	171	171	171	171	0
Firm Power Sales	MW	0	0	0	0	0	150
Controllable and Dispatchable DR - Available	MW	41	42	43	43	43	44
Other Controllable and Dispatchable DEG - Available	MW	0	2	3	5	6	8
Net Peak Demand (Forecasted)	MW	4,410	4,442	3,988	4,034	4,073	4,061
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	4,939	4,975	4,467	4,518	4,562	4,548
Excess Capacity	MW	1,017	996	701	538	804	818
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	35.1%	34.4%	29.6%	25.3%	31.7%	32.1%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# SUNFLOWER ELECTRIC POWER CORPORATION



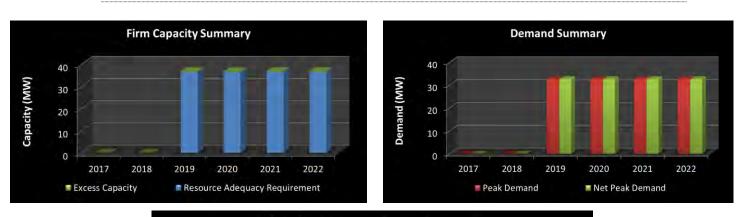


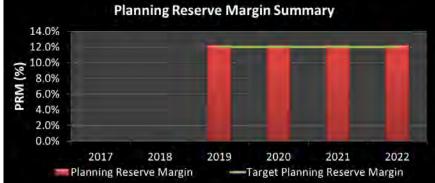




Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	1,061	1,074	1,122	1,122	1,122	1,100
Firm Capacity Resources (Other)	MW	1,001	1,074	1,122	0	0	1,100
Firm Capacity Purchases	MW	188	188	7	7	7	7
Firm Capacity Fulctures	MW	29	44	0	0	0	/
Confirmed Retirements	MW	29	44	0	0	0	0
				-		0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	1,220	1,218	1,129	1,129	1,129	1,107
Demand Summary							
Peak Demand (Forecasted)	MW	973	977	967	974	953	944
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	973	977	967	974	953	944
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	1,090	1,094	1,083	1,091	1,067	1,057
Excess Capacity	MW	131	124	45	38	62	50
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	25.4%	24.7%	16.7%	15.9%	18.5%	17.3%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# WEST TEXAS MUNICIPALS





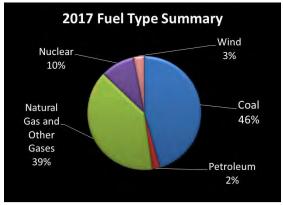
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	0	0	0	0	0	0
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	0	0	37	37	37	37
Firm Capacity Sales	MW	0	0	0	0	0	0
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	0	0	37	37	37	37
Demand Summary							
Peak Demand (Forecasted)	MW	0	0	33	33	33	33
Firm Power Purchases	MW	0	0	0	0	0	0
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	0	0	33	33	33	33
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW			37	37	37	37
Excess Capacity	MW			0	0	0	0
Deficient Capacity	MW			0	0	0	0
Planning Reserve Margin	%			12.2%	12.2%	12.2%	12.2%
SPP Target Planning Reserve Margin	%			12.0%	12.0%	12.0%	12.0%

#### WESTAR ENERGY









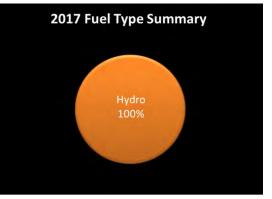
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	6,527	6,527	6,527	6,527	6,527	6,527
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	433	383	420	355	275	209
Firm Capacity Sales	MW	766	741	604	539	414	364
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	6,194	6,169	6,343	6,343	6,388	6,372
Demand Summary							
Peak Demand (Forecasted)	MW	5,307	5,323	5 <i>,</i> 360	5,396	5,441	5,492
Firm Power Purchases	MW	112	112	112	112	112	112
Firm Power Sales	MW	0	0	0	0	0	0
Controllable and Dispatchable DR - Available	MW	244	240	236	231	226	221
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	4,951	4,971	5,012	5,053	5,104	5,159
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	5,545	5 <i>,</i> 567	5,613	5 <i>,</i> 659	5,716	5,778
Excess Capacity	MW	649	602	730	684	672	594
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	25.1%	24.1%	26.6%	25.5%	25.2%	23.5%
SPP Target Planning Reserve Margin	%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%

# WESTERN AREA POWER ADMINISTRATION





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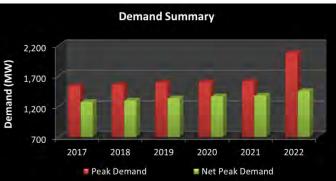
Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	2,406	2,406	2,406	2,406	2,406	2,406
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	2	2	2	4	4	4
Firm Capacity Sales	MW	440	440	440	440	440	440
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	45	45	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	301	0	0	0	0	0
Firm Capacity	MW	1,667	1,923	1,923	1,970	1,970	1,970
Demand Summary							
Peak Demand (Forecasted)	MW	738	738	738	738	738	738
Firm Power Purchases	MW	144	144	144	144	144	144
Firm Power Sales	MW	748	748	748	748	748	748
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	0	0	0	0	0	0
Net Peak Demand (Forecasted)	MW	1,342	1,342	1,342	1,342	1,342	1,342
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	1,475	1,475	1,475	1,475	1,475	1,475
Excess Capacity	MW	192	448	448	495	495	495
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	24.2%	43.3%	43.3%	46.8%	46.8%	46.8%
SPP Target Planning Reserve Margin	%	9.89%	9.89%	9.89%	9.89%	9.89%	9.89%

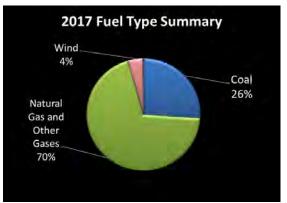
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# WESTERN FARMERS ENERGY SERVICES









Firm Capacity Summary	Unit	2017	2018	2019	2020	2021	2022
Firm Capacity Resources	MW	1,359	1,359	1,359	1,359	1,359	1,359
Firm Capacity Resources (Other)	MW	0	0	0	0	0	0
Firm Capacity Purchases	MW	325	325	355	355	355	355
Firm Capacity Sales	MW	0	0	0	0	0	40
Confirmed Retirements	MW	0	0	0	0	0	0
Scheduled Outages	MW	0	0	0	0	0	0
Transmission Limitations	MW	0	0	0	0	0	0
Other Capacity Adjustments - Additions	MW	0	0	0	0	0	0
Other Capacity Adjustments - Reductions	MW	0	0	0	0	0	0
Firm Capacity	MW	1,683	1,683	1,713	1,713	1,713	1,673
Demand Summary							
Peak Demand (Forecasted)	MW	1,537	1,554	1,590	1,601	1,610	2,080
Firm Power Purchases	MW	460	460	460	460	460	610
Firm Power Sales	MW	246	246	246	246	246	0
Controllable and Dispatchable DR - Available	MW	0	0	0	0	0	0
Other Controllable and Dispatchable DEG - Available	MW	47	40	40	19	15	15
Net Peak Demand (Forecasted)	MW	1,276	1,300	1,336	1,368	1,381	1,455
Energy Efficiency and Conservation (Included in Peak Demand)	MW	0	0	0	0	0	0
Standby Load Under Contract (Included in Peak Demand)	MW	0	0	0	0	0	0
Requirements Summary							
Resource Adequacy Requirement	MW	1,429	1,455	1,496	1,532	1,547	1,630
Excess Capacity	MW	254	228	217	181	167	44
Deficient Capacity	MW	0	0	0	0	0	0
Planning Reserve Margin	%	31.9%	29.5%	28.2%	25.3%	24.1%	15.0%

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ER-2018-0145 and ER-2018-146

# KANSAS CITY POWER & LIGHT COMPANY and KANSAS CITY POWER LIGHT GREATER OPERATIONSCOMPANY

SCHEDULE JAR-D-6

HAS BEEN DEEMED

"CONFIDENTIAL"

IN ITS ENTIRETY