

Response to Hack Rob Interrogatories - KCPL GMO to OPC  
Date of Response:

Question:KCPL-2

1. On p. 34 of her Rebuttal testimony, OPC witness Lena Mantle claims that KCP&L had the opportunity to enter into contracts with other Missouri based wind projects at a lower price as a result of its 2013 RFP. Please provide:

A: all other Missouri wind projects where KCP&L had the opportunity to enter into contracts;

B: the price and terms of those contracts.

RESPONSE: (do not edit or delete this line or anything above this)

A: The OPC cannot identify "all" of the other Missouri wind projects where KCP&L had the opportunity to enter into contracts. The OPC can instead only speak to those Missouri wind projects of which it is aware, which, incidentally, are those that were identified in KCP&L's various RFPs. This is why the testimony referenced in this DR refers back to KCP&L's 2013 RFP. Therefore, to see what Missouri wind projects that the OPC was aware of please see KCP&L's response to OPC DR 8005 in case EO-2019-0068. However, it is important to remember that there could very easily be a large number of other Missouri wind projects that were potentially available for KCP&L to enter into that were not included in KCP&L's RFPs for various reasons (including, for example, the wind projects only becoming available after KCP&L issued its last RFP).

B: All information regarding the price and terms of any contracts of which the OPC was aware was provided to the OPC by KCP&L itself. Please see KCP&L's responses to OPC DR 8005 in case EO-2019-0068.

Response provided by Lena M. Mantle

KCPL  
Exhibit No. 10  
Date 9-27-19  
Prepared By JMK  
File No EO-2019-0067  
EO-2019-0068  
EO-2019-0199

Exhibit No.	
Date	
Exhibit No.	