

KCPL GMO  
Case Name: 2017 FAC (8th)  
Case Number: EO-2019-0067

FILED  
September 4, 2019  
Data Center  
Missouri Public  
Service Commission

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

Question:KCPL-3

2. On p. 36 of her Rebuttal testimony, OPC witness Lena Mantle claims that an affiliate transaction is not a reason for the Commission to find the prices paid for the PPAs prudent. Please list where KCP&L claimed that that an affiliate transaction was a reason why the Rock Creek and Osborn PPAs are prudent. Please also list any reasons why OPC believes that Missouri ratepayers are harmed by the transmission of electricity by Transource from the Rock Creek and Osborn wind farms .

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

On page five of Mr. Crawford's direct testimony, he claims that one of the benefits of the Rock Creek and Osborn PPAs is that the wind projects are directly tied into the recently constructed Midwest Transmission Project transmission line. This Midwest Transmission Project transmission line is partially owned by KCP&L's parent company, Evergy, which is an affiliate entity of KCP&L as that term is defined in 4 CSR 240-20.015. The use of the Midwest Transmission Project transmission line by KCP&L therefore constitutes an affiliate transaction. Because Mr. Crawford points to the fact that the Rock Creek and Osborn PPAs can make use of the recently constructed Midwest Transmission Project transmission line as one potential benefit of those PPAs and because the use of the Midwest Transmission Project transmission line constitutes an affiliate transaction for KCP&L, Mr. Crawford is basically stating that one of the benefits of the Rock Creek and Osborn PPAs is their ability to let KCP&L engage in an affiliate transaction.

As for the second question, the only harm to ratepayers from the transmission of electricity by Transource from the Rock Creek and Osborn wind farms that OPC is aware of is that the ratepayers are having to pay an uneconomic price for the wind energy transmitted from the Rock Creek and Osborn wind farms.

Response provided by Lena M. Mantle

KCPL Exhibit No. 11  
Date 8-21-19 Reporter BJK  
File No. EO-2019-0067  
EO-2019-0068  
ER-2019-0199