

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the General Investigation to )  
Examine Issues Surrounding Rate Design ) Docket No. 16-GIME-403-GIE  
for Distributed Generation Customers )  
)

**INITIAL COMMENTS OF SUNFLOWER ELECTRIC POWER CORPORATION AND  
MID-KANSAS ELECTRIC COMPANY, LLC**

COMES NOW Sunflower Electric Power Corporation ("Sunflower") and Mid-Kansas Electric Company, LLC ("Mid-Kansas"), and jointly submits their initial comments in this proceeding. In support of their comments, Sunflower and Mid-Kansas state:

1. On March 11, 2016, Commission Staff ("Staff") filed a motion requesting a Commission order opening a general investigation to examine various issues surrounding rate design for distributed generation ("DG") customers.
2. On July 12, 2016, the State Corporation Commission of the State of Kansas ("Commission") issued an Order Opening General Investigation, opening this general investigation docket to examine various issues surrounding rate structure for distributed generation customers.
3. On February 16, 2017, the Commission issued an Order Setting Procedural Schedule, requiring parties to file initial comments and supporting affidavits in this docket by March 17, 2017. In accordance with the aforementioned, Sunflower and Mid-Kansas now submit the following initial comments.
4. Sunflower and Mid-Kansas support a collaborative effort between all parties to this docket in order to facilitate a "thorough and thoughtful discussion of the

appropriate rate structure for DG, including the quantifiable costs and quantifiable benefits of DG.”<sup>1</sup> While solutions are not abundantly clear, Sunflower and Mid-Kansas submit that there are several general issues that are appropriate for the discussion in this docket. They are discussed below, organized in the same manner as Staff’s Report and Recommendation that was attached to its Motion to Open Docket.

### **I. Costs of Distributed Generation**

5. Generally, a utility that serves a DG customer needs to reserve physical capacity to serve the DG customer during planned and unplanned outages of the DG customer. To do so, that utility must have sufficient generation or power supply in place to provide service, and additionally secure or provide for adequate transmission and distribution facilities to move the power from a generation resource to the DG customer load. Those facilities are still in existence even when the DG customer is not using them, and must be available for use whenever the customer generation facility cannot provide adequate supply. Further, they have costs, and an appropriate allocation of those costs must be determined.

6. As pointed out by Staff, most DG is renewable, and therefore, intermittent.<sup>2</sup> That fact exacerbates the aforementioned issue because not only must a utility keep such facilities in place, it is much more costly and difficult for a utility to dispatch generation in response to the fluctuations in DG systems. The utility serving the DG customer has no control over those intermittent and unexpected demand fluctuations, but must be able to meet any DG customer demand.

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<sup>1</sup> Order Opening General Investigation, ¶10, Docket No. 16-GIME-403-GIE (filed July 12, 2016).

<sup>2</sup> Motion to Open Docket, Docket No. 16-GIME-403-GIE, attached Report and Recommendation of the Utilities Division, p. 5 (filed March 11, 2006)

7. In addition, generation dispatch in the Southwest Power Pool, Inc. ("SPP") region is performed by SPP. Because DG is intermittent, a generation utility typically can not rely on the DG being available during peak hours, so an SPP utility must have enough accredited capacity to fully cover the DG customer's peak load even though during certain times their load required will be reduced by their own DG. In other words, Sunflower's and Mid-Kansas's capacity obligation to cover a DG customer's load and reserve requirements is not reduced by the full amount of the DG customer's DG.

## **II. Benefits of Distributed Generation**

8. Sunflower and Mid-Kansas share Staff's,<sup>3</sup> Westar's,<sup>4</sup> and the Commission's<sup>5</sup> views that the benefits of DG are difficult to quantify. Sunflower and Mid-Kansas also agree with Westar's assertion that ratemaking in Kansas has historically been cost-based as opposed to additionally incorporating benefits into an electric service rate.<sup>6</sup> Any ratemaking approach for DG customers should also be cost-based, in accordance with Commission precedent. A utility that provides electric service in Kansas would only be allowed to recover the costs of its provision of service, plus an appropriate margin to fund its operations. Any general or specific benefit that the utility provides would already be accounted for in its cost of service. Likewise, any quantifiable benefit provided by a DG customer, or any customer for that matter, would be accounted for in the reduction of the electric utility's cost of service, and passed on to the DG customer in the form of lower rates. While the parties to this docket will discuss

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<sup>3</sup> *Id.* at p. 6

<sup>4</sup> Motion to Intervene and Response of Westar Energy, Inc. and Kansas Gas and Electric Company to Staff's Motion to Open Docket, Docket No. 16-GIME-403-GIE, ¶¶ 21-22 (filed March 24, 2016) (hereinafter referred to as the "Westar Response")

<sup>5</sup> Order Opening General Investigation, ¶10, Docket No. 16-GIME-403-GIE (filed July 12, 2016).

<sup>6</sup> Westar Response, ¶¶12-13.

the benefits of DG, the Commission should continue to employ a cost-based ratemaking approach to all rates.

### **III. Adding a Residential Demand Charge**

9. With respect to discussions regarding residential demand charges in this docket, any residential demand charge should be calculated using a monthly non-coincident monthly peak. If a coincident peak methodology is used, the DG customer has the opportunity to avoid the utility system peak and avoid all demand costs during any given month.

10. In addition, the parties to this docket should consider a coincident or non-coincident peak with a 12-month ratchet. Capacity costs are a function of a DG customer's contribution to a utility's annual coincident peak. If a DG customer runs its generation 11 months of the year and pays minimal non-coincident peak charges during those months, then shuts off DG during the utility's peak month and pays a non-coincident peak that is representative of the DG customer's actual full load, the DG customer could end up paying for about 1/12<sup>th</sup> of the DG customer's actual contribution to a utility's capacity fixed costs.

### **IV. Other Rate Design Possibilities**

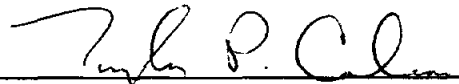
11. A grid use or increased customer charge should be considered as a potential rate design option. This allows the utility to calculate an appropriate cost to serve each customer and assists in proper cost recovery. The increased charge will be offset to some degree by an adjustment in the residential energy charges.

12. If the parties to this docket consider a buy-all sell-all rate design in which the utility pays the DG customer its avoided cost of service for the output of its DG

facility, Sunflower and Mid-Kansas would submit that such a rate design causes unnecessary burden for the utility. The utility must calculate its avoided cost to ensure it properly pays the DG customer for production. In order to ensure proper recovery, the utility would have to recalculate its avoided cost and adjust rates annually. Calculating the net usage for each DG customer during each monthly billing cycle would be administratively burdensome.

WHEREFORE, Sunflower and Mid-Kansas request that the Commission take notice of Sunflower's and Mid-Kansas' initial comments in this matter.

Respectfully submitted,



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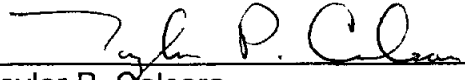
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**VERIFICATION**

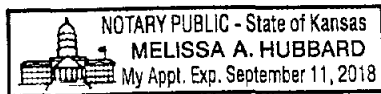
STATE OF KANSAS       )  
COUNTY OF BARTON    ) ss:

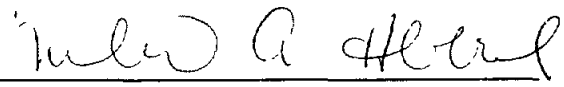
Taylor P. Calcara, of lawful age, being first duly sworn on oath, states:

That he is an Attorney for Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC; that he has read the above and foregoing Initial Comments of Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC and knows the contents thereof; and that the statements contained therein are true.

  
Taylor P. Calcara

SUBSCRIBED AND SWORN to before me this 17th day of March, 2017.



  
Notary Public

Commission Expires: 9-11-2018

**CERTIFICATE OF SERVICE**

I do hereby certify that on the 17th day of March, 2017, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing Initial Comments with a copy e-mailed to:

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16-GIME-403-GIE  
Sunflower and Mid-Kansas Initial Comments

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**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the General Investigation	)	
to Examine Issues Surrounding Rate	)	Docket No. 16-GIME-403-GIE
Design for Distributed Generation	)	
Customers	)	

**SUPPORTING AFFIDAVIT OF JAMES BRUNGARDT**

STATE OF KANSAS	)	
	)	ss:
COUNTY OF ELLIS	)	

Before me, on the 17<sup>th</sup> day of March, 2017, personally appeared James Brungardt of Sunflower Electric Power Corporation who, upon being by me duly sworn on oath deposed and said the following:

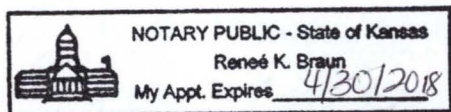
1. My name is James Brungardt. I am over the age of 21, of sound mind and competent to testify to the matters stated herein. I am the Manager, Regulatory Relations for Sunflower Electric Power Corporation, and I have knowledge concerning the Initial Comments of Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC (the "Initial Comments"), filed as of the date hereof in Docket No. 16-GIME-403-GIE.
2. I have personal knowledge of the statements made in the Initial Comments, and was involved in their preparation. The statements made in the Initial Comments are true and accurate, as of the date hereof.

  
James Brungardt

SUBSCRIBED AND SWORN to before me this 17th day of March, 2017.

Renee K. Braun  
Notary Public

Commission Expires: April 30, 2018



**CERTIFICATE OF SERVICE**

I do hereby certify that on the 17th day of March, 2017, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing Supporting Affidavit of James Brungardt with a copy e-mailed to:

*/s/ Renee K. Braun*

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