

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

In the Matter of a General Investigation for)	
the Purpose of Investigating Whether)	
Annual or Periodic Cost/Benefit Reporting)	Docket No. 17-SPPE-117-GIE
by SPP and Kansas Electric Utilities that)	
Participate in SPP is in the Public Interest.)	

COMMENTS OF MIDWEST ENERGY, INC.

COMES NOW, Midwest Energy, Inc. ("Midwest"), and hereby files its comments responsive to the State Corporation Commission of the State of Kansas' ("Commission" or "KCC") January 19, 2017 Order Opening General Investigation. In support of its comments, Midwest states as follows:

1. On January 19, 2017, the Commission issued an Order Opening General Investigation, noting that in Docket No. 14-SPPE-563-SHO Staff recommended that a general investigation be opened: (1) to investigate the value of requiring SPP to file periodic or annual reports to the Commission addressing the benefits of continued SPP membership for Kansas utilities; and (2) to investigate the value of requiring regulated Kansas SPP-member Transmission Owners (TO) to file periodic or annual reports addressing utility specific benefits of continued SPP membership for each utility's retail ratepayers.

2. On February 9, 2017, several interested parties filed a Joint Motion of Extension of Time to File Comments, which was granted by Commission Order issued on February 28, 2017. These comments are filed in compliance with the extended due date granted by the Commission.

3. In its Order Opening General Investigation, the Commission indicated its desire to engage in a thorough and thoughtful discussion as to whether such reporting is in the public interest and, if so, what information the report and any associated study should entail. The Commission requested that interested parties file comments regarding the sixteen questions from Staff's September 29, 2016 Report and Recommendation, along with any other questions or information the parties deem relevant to the issue of the costs and benefits of continued participation in SPP.

4. The sixteen questions from Staff's Report and Recommendation upon which the Commission requested comments are as follows:

- (a) In the event that the Commission requires a study to determine the costs and benefits associated with continued membership in SPP, what specific parameters should be included in the study?
- (b) Should the study be limited to a comparison of production cost savings associated with the Integrated Market (IM) versus the increased transmission expense and SPP Administration expense associated with membership in SPP?
- (c) Should two separate cost/benefit studies be completed with one on the cost/benefits of the IM and the other on the cost/benefits of the transmission system?
- (d) Should the study be performed by an independent third party consultant, or can this analysis be performed by internal expertise within the utilities?
- (e) How often should such a study be updated once performed?
- (f) How quantifiable and objective would such an analysis be?
- (g) Without a study, is it possible to say with certainty whether Kansas ratepayers are better off today with Kansas electric utilities being members of SPP? Would it be possible after the study?
- (h) What evidence exists today regarding the costs/benefits of SPP membership that Kansas ratepayers are benefitting from Kansas utility participation in SPP?

- (i) Over what time period should the study cover? Should the study cover the last five years, ten years, or only since the implementation of the IM?
- (j) Should the study attempt to reflect the anticipated costs and benefits of continued SPP membership for the foreseeable future using data that is known or that can be determined with certainty today?
- (k) What alternatives to SPP membership exist for Kansas electric utilities today?
- (l) Should the study, if required, compare the costs and benefits of SPP to membership in the Midwest Independent System Operator (MISO)?
- (m) What other Regional Transmission Organizations or regional transmission planning entities, if any, should be considered in the analysis of alternatives?
- (n) Is it feasible for Kansas to form its own regional transmission planning entity similar to what New York and California have done? If so, should the costs and benefits of that possibility be evaluated in this study?
- (o) If Kansas utilities were not members of SPP, would there still be opportunities to pursue economy energy sales/purchases from the IM? Would other entities or SPP still use transmission facilities owned by Kansas utilities? To what extent should this be included in the effects of a possible cost/benefit study?
- (p) If Kansas utilities were not members of SPP, would there still be opportunities for Kansas utilities to sell transmission capacity on the facilities located in Kansas and owned by Kansas utilities? To what extent should this be included in the effects of a possible cost/benefit study?

I. Introduction

5. Following the issuance of the Commission's Order opening this investigation, Midwest and several other interested stakeholders convened a series of conference calls with the Southwest Power Pool, Inc. ("SPP") to discuss the issues and questions raised in the Order. SPP is a Regional Transmission Organization ("RTO") approved by the Federal Energy Regulatory Commission ("FERC").¹ SPP has also received a certificate of convenience and authority from

¹ *Sw. Power Pool, Inc.*, 109 FERC ¶ 61,009 (2004), *order on reh'g*, 110 FERC ¶ 61,137 (2005).

the Kansas Corporation Commission (“Commission”) for the limited purpose of managing and coordinating transmission facilities for Kansas utilities.²

6. SPP is an Arkansas non-profit corporation with its principal place of business in Little Rock, Arkansas. SPP has ninety-four Members, including sixteen investor-owned utilities, fourteen municipal systems, twenty generation and transmission cooperatives, eight state agencies, thirteen independent power producers, twelve power marketers, ten independent transmission companies, and one federal agency. As an RTO, SPP administers open access transmission service over approximately 60,000 miles of transmission lines covering portions of Arkansas, Iowa, Kansas, Louisiana, Minnesota, Missouri, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, and Wyoming, across the facilities of SPP’s Transmission Owners,³ and administers the Integrated Marketplace, a centralized day ahead and real-time energy and operating reserve market with locational marginal pricing (LMP) and market-based congestion management.⁴

7. Concurrently with the filing of Midwest’s responsive comments, SPP has also filed comments responsive to the Commission’s Order. SPP provides a comprehensive discussion of its reporting and studies participation in other RTO states and cites to numerous studies that have previously been conducted that will offer insight into the questions posed by the Commission. SPP notes in its comments that it has engaged in a number of studies and reports related to the costs and benefits of participation in an RTO. These studies and reports have been conducted for a variety of reasons which include:

² See Docket Nos. 06-SPPE-202-COC and 06-WSEE-203-MIS, *Order Adopting Stipulation and Agreement and Granting Applications*, Ordering Clause E (September 19, 2006) (“September 2006 Order”).

³ See *Sw. Power Pool, Inc.*, 89 FERC ¶ 61,084 (1999); *Sw. Power Pool, Inc.*, 86 FERC ¶ 61,090 (1999); *Sw. Power Pool, Inc.*, 82 FERC ¶ 61,267, *order on reh’g*, 85 FERC ¶ 61,031 (1998).

⁴ *Sw. Power Pool, Inc.*, 146 FERC ¶ 61,130 (2014) (order approving the start-up and operation of the Integrated Marketplace effective March 1, 2014).

- a. Consideration of joining one or more RTOs,
- b. The costs and benefits of particular aspects of RTO participation,
- c. Requirements of, or filings with, state commissions, and
- d. FERC study and report requirements as specified in SPP's FERC-approved Tariff.

8. In light of SPP's extensive experience in participating and engaging in studies and reports related to RTO participation, SPP concludes that an additional study may not be needed for the Commission to make an evaluation about the benefits of continued participation in the SPP RTO by Kansas utilities when considering the information and data currently available. SPP asserts that the existing information and data, as well as completed reports, can provide significant and valuable information for the Commission, and that some of this information and data can be used as the basis to provide more details specific to Kansas if needed for the Commission's assessment.

9. SPP has asserted in its comments that sufficient information is available in current analyses and other data to demonstrate the net benefits to SPP regional load resulting from SPP services. Where possible, SPP has committed to work with member companies to provide Kansas-specific information from existing reports, study, and data.

10. Midwest concurs with SPP's conclusion that a new study regarding the costs and benefits of continued participation in SPP is not necessary, and that existing information or the supplementation of existing information with Kansas-specific data is more than adequate to provide the answers to the questions the Commission is posing. Utilizing current information also promotes the efficient use of resources for all parties, including the Commission and its Staff. As a result, SPP believes that sufficient information is available in these analyses and other

data to demonstrate the net benefits to SPP regional load resulting from SPP services. Where possible, SPP can work with member companies to provide Kansas-specific information from existing reports, study, and data.

II. Midwest Energy's Comments to the Commission's Questions and Requests in Paragraph 9

11. As requested by the Commission, Midwest hereby provides comments to the sixteen individual questions posed by the Commission and the Commission Staff Report and Recommendation.

In the Commission's Order opening this docket, the Commissions stated that,

The Commission desires a thorough and thoughtful discussion as to whether such reporting is in the public interest, and if so, what information the report and any associated study should entail. Therefore, the Commission seeks comment from the parties on the following questions from Staff's [Report and Recommendation], along with any other questions or information the parties deem relevant to the issue of the costs and benefits of continued participation in SPP.⁵

Questions

12. The Commission seeks comment from the parties on the following questions from Staff's R&R, along with any other questions or information the parties deem relevant to the issue of the costs and benefits of continued participation in SPP:

- (a) In the event that the Commission requires a study to determine the costs and benefits associated with continued membership in SPP, what specific parameters should be included in the study?

Midwest Response:

A full assessment of the benefits and costs associated with participation in the SPP RTO should include the following, at a minimum:

⁵ Docket No. 17-SPPE-117-GIE, *Order Opening General Investigation*, at paragraph 9 (January 19, 2017).

- Costs and benefits of transmission system upgrades
- Administrative fees for SPP services
- Net savings from market operations, commitment, and dispatch
- Operating reserve sharing
- Provision of ancillary services
- Change in energy losses and capacity savings associated with losses
- Reduction in market transaction costs
- Reliability coordination services
- Tariff administration services
- Transmission provider services
- Transmission planning services, including interregional planning
- Consolidated Balancing Authority
- Capacity margin reduction
- Elimination of pancaked rates
- Generator interconnection services
- Facilitation of wind power
- Mitigation of seams issues
- Ramifications of Order No. 1000 implementation
- Interconnection capacity between Kansas utilities and SPP as compared to other regions considered

(b) Should the study be limited to a comparison of production cost savings associated with the Integrated Market (IM) versus the increased transmission expense and SPP Administration expense associated with membership in SPP?

Midwest Response:

No. See Response to (a). The items noted therein are examples of various other types of benefits available through membership in a RTO beyond the single measure of production cost savings that arises through participation in a single balancing authority across the IM.

- (c) Should two separate cost/benefit studies be completed with one on the cost/benefits of the IM and the other on the cost/benefits of the transmission system?

Midwest Response:

No. The two are intertwined and should not be considered separately. While some of the transmission expansion projects in SPP have been built solely to facilitate the integration of wind generation facilities, other transmission projects have had broader impact on the IM as a whole, and still others have provided reliability impact. Although there are several Kansas companies that both own transmission and participate in the IM, there are other SPP stakeholders that have transmission facilities in the region, but no generation participating in the IM; others participate in the market but control no transmission. While some Kansas transmission owners have seen expansion projects aimed primarily at wind integration it is also those same wind resources that are, at times, keeping the nodal energy prices at low levels. Consideration of the costs or benefits of one component (*e.g.* transmission) without the other (*e.g.* the IM) would likely provide an incomplete picture of the costs and benefits of RTO participation.

- (d) Should the study be performed by an independent third party consultant, or can this analysis be performed by internal expertise within the utilities?

Midwest Response:

Midwest Energy agrees with SPP's assertion that this type of study, if required, should be conducted as a joint effort including SPP, the Kansas entities and an

independent third party. The benefits of a joint study would be the utilization of a common set of base assumptions, the use of common models, and consistency in the development of benefits and costs for the group of Kansas entities as a whole. SPP will provide an important amount of data across not only the Kansas stakeholders, but the entire SPP footprint where appropriate. Particularly as it relates to IM data their participation is key to development of a thorough analysis. However, the cost of having a third party consultant assist with the study will most likely be substantial, as will the investment of resources by SPP and the Kansas stakeholders.

- (e) How often should such a study be updated once performed?

Midwest Response:

Once the data and resulting potential benefits and costs from the study are assessed, the Commission can then re-evaluate whether the study should be periodically updated and at what appropriate interval.

- (f) How quantifiable and objective would such an analysis be?

Midwest Response:

The goal should be to make it as quantifiable and objective as possible. One benefit of a study as a joint effort among the interested stakeholders and an independent third party is the ability to craft the parameters and inputs of the study in order to be as objective as possible and based on a consistent set of initial assumptions across the Kansas stakeholders.

- (g) Without a study, is it possible to say with certainty whether Kansas

ratepayers are better off today with Kansas electric utilities being members of SPP? Would it be possible after the study?

Midwest Response:

Midwest concurs with SPP's assessment that there currently is substantial evidence today that demonstrates the benefits of participation in the SPP RTO. The development of a study specific to Kansas may not provide enough additional information to warrant the investment of resources by the Kansas stakeholders.

(h) What evidence exists today regarding the costs/benefits of SPP membership that Kansas ratepayers are benefitting from Kansas utility participation in SPP?

Midwest Response:

The comments submitted by SPP and the studies cited to therein contain numerous examples and evidence of the benefits of SPP membership to Kansas utilities and ratepayers. Among those that are noteworthy to Midwest are:

- Centrally dispatched market has provided Midwest Energy access to various resources in SPP ultimately reducing energy costs.
- Consolidated Balancing Authority along with interconnection facilitation has allowed for additional wind in the region that otherwise may have proven too burdensome for historical BAs to manage individually.
- SPP EIS and now SPP IM have provided additional markets for Midwest owned or purchased generation.
- Tariff administration and Reliability Coordination.
- Operational (current-day and next-day) planning studies performed across the entire region, leading to improved reliability.
- Regional long-term transmission planning

- (i) Over what time period should the study cover? Should the study cover the last five years, ten years, or only since the implementation of the IM?

Midwest Response:

The study should cover the time period subsequent to the implementation of the SPP Integrated Marketplace in March 2014.

- (j) Should the study attempt to reflect the anticipated costs and benefits of continued SPP membership for the foreseeable future using data that is known or that can be determined with certainty today?

Midwest Response:

Consideration of future costs and benefits are the most challenging aspect of the type of study being considered. As noted previously, a study purporting to represent benefits and costs to Kansas stakeholders requires agreement on a wide range of initial assumptions, many of which are required to support a forward-looking analysis. When it comes to future costs, including energy production costs as but one example, determining those future costs “with certainty” is a challenge at best. Absent such certainty it is critical that the Kansas stakeholders reach early agreement on numerous study parameters in order to expect the study results to be of sufficient quality they can be relied upon to support decisions regarding future RTO participation.

- (k) What alternatives to SPP membership exist for Kansas electric utilities today?

Midwest Response:

Many options are available, such as withdrawing from SPP and joining another RTO, having utilities be stand-alone, or forming a Kansas-only RTO.

However, any option would be subject to approval by FERC.

- (1) Should the study, if required, compare the costs and benefits of SPP to membership in the Midwest Independent System Operator (MISO)?

Midwest Response:

If the Commission determines that a study is necessary, the Commission has a number of options to consider, including withdrawing from SPP and joining other RTOs, having utilities be stand-alone, or forming a Kansas-only RTO. If such a study is determined by the Commission, part of the analysis must include the costs and obligations of withdrawal from SPP. The SPP Membership Agreement makes it clear that a withdrawing transmission owner has an obligation to pay its allocated share of the debt incurred by SPP and the cost of transmission facilities approved for construction prior to the withdrawal. For Midwest this exit obligation is estimated to be two million dollars for the share of the outstanding debt, and seventy million dollars for the Schedule 11 obligations, based on an estimate provided by SPP for obligations as of December 31, 2016. A transmission owner may also have a revenue stream owed by SPP to the TO. This would be based on the full revenue requirements of projects constructed by the TO, applied as an offset of the exit charges. Any estimate of net revenue/cost would likely underestimate the withdrawal cost as revenue associated with the withdrawing TO's facilities will likely decrease after withdrawal. This is because Section 4.3.1 of the Membership Agreement

specifically addresses only service “under transmission contracts executed before the Termination Date” and does not mention subsequent transmission service contracts.

- (m) What other Regional Transmission Organizations or regional transmission planning entities, if any, should be considered in the analysis of alternatives?

Midwest Response:

If the Commission determines that a study of another RTO option is necessary, the study should evaluate all options available to Kansas utilities.

- (n) Is it feasible for Kansas to form its own regional transmission planning entity similar to what New York and California have done? If so, should the costs and benefits of that possibility be evaluated in this study?

Midwest Response:

No. The relatively small amount of Kansas load makes achieving economies of scale too difficult. Forming an RTO in Kansas is not feasible or practical.

- (o) If Kansas utilities were not members of SPP, would there still be opportunities to pursue economy energy sales/purchases from the IM? Would other entities or SPP still use transmission facilities owned by Kansas utilities? To what extent should this be included in the effects of a possible cost/benefit study?

Midwest Response:

SPP membership is not required for participation in the SPP Integrated Marketplace. Use of transmission facilities and generating resources connected to the bulk electric system, both those owned by Kansas utilities and those

owned by other SPP members, should be evaluated during a study. Various Kansas stakeholders are likely to incur both costs and benefits of such withdrawal, some of which will be quite difficult to quantify on a hypothetical basis. One particular cost not currently incurred by SPP members that must be considered is the potential for higher transmission services costs through the pancaking of rates.

- (p) If Kansas utilities were not members of SPP, would there still be opportunities for Kansas utilities to sell transmission capacity on the facilities located in Kansas and owned by Kansas utilities? To what extent should this be included in the effects of a possible cost/benefit study?

Midwest Response:

Under FERC open access policy, available transmission capabilities must be sold on a non-discriminatory basis. The revenue requirements of a Kansas transmission owner may not change substantially upon withdrawal from the SPP, but the costs to provide such service are likely to escalate quickly if some of the SPP services are required to be duplicated by individual transmission owners. The costs and benefits of Kansas utilities buying and selling transmission capacity should be evaluated during a study. This should include consideration of what entity/entities would be responsible for evaluating and granting service for transmission service requests. Such a study should also include the cost of procuring transmission that crosses seams between individual transmission owners, seams with other RTOs, “through and out” rates, etc.

13. In accordance with the Commission request for comment, in addition to the responses to the sixteen questions set forth above, Midwest suggests that the following issues should be considered by the Commission in any evaluation of a study that contemplates the Kansas stakeholders' withdrawal from SPP:

- a. Services provided by SPP to Midwest: Because of Midwest's relatively small size there are certain services that Midwest has chosen to procure from SPP, rather than self-providing. For example, Midwest has an obligation pursuant to certain NERC reliability standards to conduct current-day and next-day transmission contingency planning studies multiple times per day. In as much as Midwest is a very small player in the generation resources that are bid into the market, and hence has a limited view of the resources available across the SPP footprint at any given time, any contingency analysis conducted by Midwest will have a limited view of the SPP transmission loading conditions. SPP, on the other hand, has full access to all the generating and transmission resources available and unavailable. The results of a contingency study conducted in the operating horizon will be much more reflective of actual system conditions and likely lead to better operating decisions than an analysis conducted by Midwest with its limited view of the network.
- b. Another interesting issue for consideration is the status of Midwest as a Reliability Entity in the SPP Regional Entity. Currently Midwest is subject to audit by the SPP RE on the various NERC reliability standards applicable to Midwest. Based on past precedent, it seems likely the FERC would

require that Midwest continue its reliability compliance program under the SPP RE. While this does not present an insurmountable hurdle to exit from the SPP RTO, it does add another dimension to the consideration of such exit.

III. Recommendations

14. Based upon the evidence currently available that demonstrates the benefits of participation in SPP, Midwest does not believe that requiring a new study is necessary or practical. Midwest recommends that the Commission find that any necessary reporting by SPP and the Kansas utilities regarding the costs and benefits to Kansas utilities and ratepayers afforded by continued SPP membership can be found with existing data and information or exists with various reports produced without a new reporting requirement or conducting an extensive and costly new study. To the extent required, current data can be supplemented to provide Kansas-specific data. SPP has recommended that the Commission have SPP and Kansas utilities provide existing information to the Commission as to the benefits of participation in the SPP RTO. SPP has also suggested that the Commission should consider having SPP file with the Commission certain reports currently produced by SPP after these reports are finalized and published on the schedule required under SPP Tariff requirements.⁶ These reports can be filed with the Commission. Based upon these filings, the Commission can decide if additional analysis or information is needed. Upon such a determination by the Commission, SPP and Kansas utilities can provide the additional information needed.

⁶ These filings can include the tariff required RCAR reports, Annual State of the Market Reports, STEP Reports, etc.

15. An evaluation of currently existing data to assess what additional information may be helpful would promote administrative efficiency, while still providing the information the Commission seeks.

Respectfully submitted,

POLSINELLI PC


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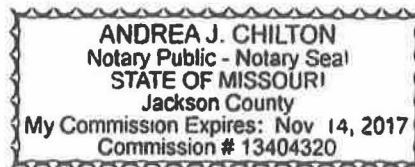
Anne E. Callenbach, being first duly sworn upon her oath, deposes and states that she is Counsel for Midwest Energy, Inc., that she has read and is familiar with the foregoing document, and that the statements therein are true to the best of her knowledge, information and belief.



Anne E. Callenbach

Subscribed and sworn to before me this 17th day of April, 2017.





CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was e-mailed, this 17th day of April, 2017, to:

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