

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

IN THE MATTER OF THE APPLICATION]
OF NEXTERA ENERGY TRANSMISSION]
SOUTHWEST, LLC FOR ITS CERTIFICATE] KCC DOCKET NO. 22-NETE-419-COC
OF CONVENIENCE AND NECESSITY TO]
CONSTRUCT TRANSMISSION FACILITIES]
IN THE STATE OF KANSAS]

CROSS-ANSWERING TESTIMONY OF
JOSH FRANTZ
ON BEHALF OF
THE CITIZENS' UTILITY RATEPAYER BOARD

MAY 27, 2022

1 **Q. Please state your name and business address.**

2 A. My name is Joshua (Josh) P. Frantz. My business address is 1500 SW Arrowhead Road,
3 Topeka, Kansas 66604.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am employed by the Citizens' Utility Ratepayer Board (CURB) as a Senior Regulatory
6 Analyst.

7 **Q. Please describe your educational and professional background.**

8 A. I earned a Bachelor of Business Administration degree from Washburn University in
9 Topeka, Kansas. My undergraduate majors were finance, marketing, and management.
10 Additionally, I earned a Master of Business Administration degree, also from Washburn
11 University.

12 From August 2015 through April 2019, I was employed by the Kansas Corporation
13 Commission (KCC or "Commission"). I began my employment with the KCC in the
14 Utilities division as a Senior Research Economist and was ultimately promoted to
15 Managing Rate Analyst. I have served in my current position as Senior Regulatory Analyst
16 with CURB since April 2019.

17 **Q. Have you previously testified before the Commission?**

18 A. Yes. On behalf of CURB, I testified in Docket Nos. 19-ATMG-525-RTS, 21-WCNE-103-
19 GIE, 21-BHCG-334-GIG, 21-KGSG-332-GIG, and 21-ATMG-333-GIG. During my prior
20 employment as a member of KCC Staff, I offered testimony in seven proceedings before
21 the Commission as well as over thirty Report and Recommendations for the Commission's
22 consideration. A list of those filings can be made available, upon request.

1 **Q. What is the purpose of your testimony?**

2 A. The purpose of my testimony is to respond to the Report and Recommendation (“R&R”)
3 of KCC Staff and the Direct Testimonies of other intervenors in this Docket regarding
4 NextEra Energy Transmission Southwest’s (“NEET-SW”) application for a Certificate of
5 Public Convenience and Necessity (“COC”) to transact the business of a transmission-only
6 public utility in Kansas (“the Application”). As a disclaimer, it should not be assumed that
7 CURB agrees with or supports any concern or recommendation raised by other parties that
8 is not specifically addressed in my testimony.

9 **Q. How is your testimony organized?**

10 A. First, I provide a brief background of the proceeding along with a description of CURB’s
11 role in Southwest Power Pool (SPP) matters. Next, I provide a description of the
12 Commission’s evaluation criteria for COC applications and identify the criterion that was
13 the focus of my review of the Application. Then I provide CURB’s perspective in response
14 to the following issues raised by other parties to this docket: the quantification of benefits,
15 cost containment, and the proposed overlapping schedules between NEET-SW’s requests
16 for a COC Docket and for siting authority.

17

18 **I. Background**

19 **Q. Please provide a brief background of this proceeding.**

20 A. Kansas law, under K.S.A. 66-131 and K.S.A. 66-136, requires any entity building an
21 electric transmission line to obtain approval and certification from the Commission to
22 operate as a public utility, as set forth in K.S.A. 66-104.

1 Through SPP's competitive Transmission Owner Solicitation Process, an
2 independent Industry Expert Panel (IEP) evaluated project bids to address a number of
3 transmission-related issues within the SPP region and recommended NEET-SW as the
4 Designated Transmission Owner for the Wolf Creek to Blackberry 345 kV Transmission
5 Project ("WC-BB Project"). The WC-BB Project calls for a 94 mile long, single circuit
6 345 kV transmission line connecting the existing Wolf Creek substation ("Wolf Creek") in
7 Coffey County, Kansas with the Blackberry substation in Jasper County, Missouri. The
8 SPP Board of Directors subsequently accepted and approved the IEP's recommendation.

9 On February 28, 2022, NEET-SW — an indirect wholly-owned subsidiary of
10 NextEra Energy, Inc., the largest public utility by market capitalization in the nation —
11 filed a COC application in order to transact the business of a transmission-only public
12 utility in Kansas. NEET-SW is requesting permission to construct, own, operate, and
13 maintain 85 miles of bulk electric transmission facilities located within Kansas.

14 NEET-SW's WC-BB Project proposal contains the following key features: a
15 preliminary, direct route between the Wolf Creek and Blackberry substations; a proposed
16 cost of \$85.2 million in 2021 dollars (significantly below SPP's estimated cost of \$142.6
17 million) with cost-containment guarantees; and an in-service date of approximately
18 January 1, 2025 (a year sooner than SPP's need by date).

19 **Q. Does CURB have a role evaluating SPP processes in COC applications before the**
20 **Commission?**

21 **A.** Yes. K.S.A. 66-1223 sets out the authority of CURB. It specifies that CURB may
22 represent residential and small commercial ratepayers before the Commission. Although

1 I am not an attorney, I am informed that CURB is therefore authorized to represent
2 residential and small commercial ratepayers in COC applications before the Commission,
3 including transmission-only projects. CURB does not have specific authority to have a
4 representative at a FERC-approved regional transmission operator (RTO), such as SPP, or
5 to participate in decision making bodies of the RTO.
6

7 II. Evaluation Criteria

8 **Q. What criteria does the Commission generally consider when reviewing COC**
9 **applications?**

10 **A.** Pursuant to K.S.A. 66-131, no person or entity seeking to construct electric transmission
11 lines in Kansas may conduct business in the state until the person or entity has obtained
12 certification from the Commission, which will be issued if the Commission determines that
13 the public convenience and necessity will be promoted by authorization of the plan for the
14 electric facilities envisioned in the application.

15 In reviewing for “public interest,” the Commission has traditionally examined the
16 applicable Merger Standards¹ as well as whether the applicant possesses the “financial,
17 managerial, and technical experience”² to provide sufficient and efficient service. KCC
18 Staff walks through its analysis for COC review in its R&R,³ so, although clearly relevant
19 to the Commission’s analysis here, I will not weigh in further on every contention. Rather,

¹ Set in consolidated Dockets 172,745-U and 174,155-D circa 1991 and revised in Docket No. 97-WSRE-676-MER circa 1999.

² Order Approving Stipulation & Agreement and Granting Certificate, ¶ 63, Docket No. 11-GBEE-624-COC (Dec. 7, 2011).

³ See Report and Recommendation from KCC Staff, pp. 7–8 (May 17, 2022).

1 I will focus on the criterion most relevant to CURB's core value of advocacy for reasonable
2 utility rates for residential and small commercial consumers.

3 **Q. Which criterion has been the primary focus of your evaluation?**

4 A. My evaluation has focused on the effect of the WC-BB Project on Kansas residential and
5 small commercial ratepayers, including whether ratepayer benefits resulting from the
6 project can be quantified. I examined the expected benefit/cost ("B/C") ratios and rate
7 impacts of the project from the perspective of these customers.

8
9 **III. Quantification of Benefits**

10 **Q. KCC Staff contends ratepayer benefits from the project can be quantified.⁴ What is
11 your perspective?**

12 A. Because SPP's transmission planning process is "regionally focused rather than locally
13 focused,"⁵ benefits and costs for the WC-BB Project have been quantified by SPP at the
14 regional level. Neither SPP nor NEET-SW have quantified the *Kansas-specific* benefits of
15 the WC-BB Project for analysis in this docket.

16 When CURB asked NEET-SW whether it specifically quantified the Kansas retail
17 customer benefits associated with the WC-BB Project, NEET-SW's response to data
18 request CURB-15 (Attachment A) relied upon data from the SPP 2019 Integrated
19 Transmission Plan (ITP) Assessment Report to draw the conclusion that "the overall
20 impact to Kansas customers (taking into account both the costs from and the economic

⁴ Report and Recommendation from KCC Staff, pg. 10 (May 17, 2022).

⁵ Direct Testimony of Kelsey Allen on behalf of SPP, pg. 8 ln. 10-11 (May 17, 2022).

1 benefits of the project) will be a net savings to Kansas retail customers.”⁶ However,
2 because the ITP process evaluates the benefits of a portfolio of projects (this analysis
3 resulted in the recommendation to approve 44 transmission projects throughout the SPP
4 region), the Assessment Report does not contain project-by-project rate impacts or B/C
5 ratio calculations. In response to a data request from KCC Staff, SPP provided that the
6 WC-BB Project produced a 40-year Adjusted Production Cost (APC) savings B/C ratio of
7 1.48 in Future 1 scenario and 3.36 in Future 2.^{7,8} Yet, that is still a quantification of
8 ratepayer benefits of the project at the regional level, not Kansas-specific.

9 CURB subsequently met with SPP to discuss whether the B/C analysis or rate
10 impacts of the WC-BB Project have been quantified specifically for Kansas customers and
11 if not, whether they could be. It is my understanding that SPP has not performed Kansas-
12 specific B/C and rate impact analyses for the WC-BB Project. SPP expressed concern over
13 the practicality and accuracy of the results if it were to attempt to do so.

14 **Q. Why is it significant that the benefits of the project have not been calculated for**
15 **Kansas specifically?**

16 **A.** I believe this information may be significant to the Commission based upon prior
17 Commission policy regarding reports and studies related to the costs and benefits of
18 Kansas’s participation in SPP.

19 In Docket No. 14-SPPE-563-SHO, the KCC Staff raised issues to the

⁶ NEET-SW response to data request CURB-15 (Attachment A).

⁷ See SPP response to data request KCC-17.

⁸ Report and Recommendation from KCC Staff, pg. 11 (May 17, 2022).

1 Commission's attention which brought into question whether certain actions of SPP would
2 be detrimental to Kansas ratepayers.⁹ Subsequently, in Docket No. 17-SPPE-117-GIE
3 ("Docket 17-117") the Commission found "requiring SPP to provide the Commission with
4 Kansas-specific data pertaining to the costs and benefits of Kansas utility participation in
5 SPP will assist the Commission in its overall evaluation of whether Kansas ratepayers are
6 better off based on such participation."¹⁰ This finding was premised upon the KCC Staff's
7 recommendation that the Commission should order "SPP to provide Kansas-specific data
8 and, to the extent possible Kansas utility-specific data, for all reports and studies currently
9 conducted by SPP and any reports or studies conducted by SPP in the future related to the
10 costs and benefits of participation in SPP."¹¹

11 Compliance Docket No. 19-SPPE-384-CPL ("Docket 19-384") was opened for the
12 filing of the reports as ordered by the Commission in Docket 17-117. KCC Staff
13 recommended that if, after reviewing the compliance filings, it had any concerns or felt the
14 need for a Kansas-specific study, it would recommend such to the Commission at that
15 time.¹² SPP filed one compliance report in Docket 19-384 in August 2019.¹³ However,
16 there was no response to that compliance report from KCC Staff or any other party and
17 Docket 19-384 is now closed.

18 The Commission could consider addressing this issue, as it relates to the WC-BB
19 Project, given the prior policy regarding reports and studies related to the costs and benefits

⁹ Report and Recommendation from KCC Staff, pg. 1, Docket No. 14-SPPE-563-SHO (June 9, 2014).

¹⁰ Order on General Investigation, ¶54, Docket No. 17-SPPE-117-GIE (Mar. 19, 2019).

¹¹ Order on General Investigation, ¶52, Docket No. 17-SPPE-117-GIE (Mar. 19, 2019).

¹² Report and Recommendation from KCC Staff, pg.7, 17-SPPE-117-GIE (Dec. 20, 2017).

¹³ Compliance Filing, Docket No. 19-SPEE-384-CPL (Aug. 13, 2019).

1 of Kansas's participation in SPP. The issue of benefit quantification epitomizes the
2 complexities facing the parties to this docket and ultimately, the Commission, tasked with
3 reviewing aspects at the state level of a project which was designed for the benefit of the
4 entire 14-state SPP region.

5 **Q. The Direct Testimony of Rochelle McGhee Smart¹⁴ characterizes energy produced at
6 Wolf Creek as "Kansas power." What is your perspective?**

7 A. To quote Ms. McGhee Smart, "There is no need for a new transmission line to take Kansas
8 power, reliably generated at Wolf Creek, and send it to Missouri. By taking power away
9 from our area and distributing it to other states, the project has the significant potential to
10 reduce the reliability of electric power needed by farms and ranches in Kansas."¹⁵

11 The SPP is a regional transmission operator: an electric power transmission system
12 operator that coordinates, controls, and monitors a multi-state electric grid. Taking power
13 generated in Kansas and distributing it to other states is, in essence, a basic function of the
14 SPP — in turn, Kansas has access to energy generated in other states in order to meet
15 demand. Although energy generated at Wolf Creek is produced in Kansas, in the context
16 of a multi-state electric grid, I do not share Ms. McGhee Smart's concern over possession
17 of energy generated within the state as it pertains to reliability of the Kansas system.

¹⁴ As of this writing, Ms. McGhee Smart has not been formally granted intervention. However, her Direct Testimony filed in this docket is publicly available on the KCC website.

¹⁵ Direct Testimony of Rochelle McGhee Smart, pg. 3 Ins. 3–6 (May 17, 2022).

1 **Q. Ms. McGhee Smart recommends the Commission reject NEET-SW's Application on**
2 **the basis it will not benefit Kansans. Do you agree with her recommendation?**

3 A. No, I do not believe it is realistic to expect every individual project undertaken by SPP to
4 provide a net benefit to all SPP members. Under NEET-SW's proposal, the Kansas-
5 specific rate impact from costs of the WC-BB Project is conservatively forecasted to be
6 \$0.04 per month for the average residential customer,¹⁶ but that is without any
7 quantification of potentially offsetting Kansas-specific benefits from improved reliability.

8 Because the forecasted rate impact of this project is minimal, I do not recommend
9 the Commission reject the proposal due to bill impact concerns. My presumption is that,
10 holistically, Kansas's membership in SPP, overall, results in a net benefit to the state and
11 that finding has been largely undisturbed. Furthermore, concern over the estimated rate
12 impact of this specific proposal does not justify recommending that the Commission revisit
13 the issue of a Kansas-specific study of SPP benefits at this time.

14
15 **IV. Cost Containment**

16 **Q. Does NEET-SW's proposal include cost containment measures?**

17 A. Yes. The details of NEET-SW's cost containment measures are listed in KCC Staff's
18 Confidential-Competitive R&R on pg. 12. In the interest of keeping my testimony fully
19 public, I will not re-list those details here. At a high level, CURB agrees with KCC Staff's
20 assessment that the cost containment measures are comprehensive. KCC Staff witness

¹⁶ Direct Testimony of Becky Walding on behalf of NEET-SW, pg. 35 lns. 5-8 (Feb. 28, 2022).

1 Justin Grady describes these measures as “very extensive, and beyond what we have seen
2 in any Transmission Formula Rate (TFR) filing at FERC containing traditional cost of
3 service regulation.”¹⁷

4 **Q. Have other parties expressed concerns regarding the cost containment measures?**

5 A. Yes. Witnesses for Evergy and Southwestern Public Service Company (SPS) have
6 expressed concern regarding NEET-SW’s ability to stay within its budget of \$85.2 million
7 in 2021 dollars.

8 **Q. What is your perspective on the cost containment concerns raised by the other
9 parties?**

10 A. Cost containment is a general concern with nearly every competitive bidding process, even
11 those outside of the utility industry. Evergy witness Darrin Ives and SPS witness Jarred
12 Cooley have not been granted access to confidential-competitive data, so their stated
13 concerns are particularly broad, primarily regarding the disparity between the “very low”¹⁸
14 cost bids of NEET-SW’s proposal compared to the other bidders’ proposals. Mr. Ives and
15 Mr. Cooley both provide industry examples of situations where cost containment
16 guarantees have gone awry.^{19, 20}

17 Evergy witness Kelly Harrison does have access to confidential-competitive data.
18 Mr. Harrison’s specific concerns primarily focus on hypothetical future scenarios which
19 he believes may be claimed as exceptions to the terms of the cost containment guarantees.²¹

¹⁷ Report and Recommendation from KCC Staff, pg. 13 (May 17, 2022).

¹⁸ Direct Testimony of Darrin Ives on behalf of Evergy, pg. 12 lns. 18–19 (May 17, 2022).

¹⁹ See Direct Testimony of Darrin Ives on behalf of Evergy, pp. 10–12 (May 17, 2022).

²⁰ See Direct Testimony of Jarred Cooley on behalf of SPS, pg. 10 (May 17, 2022).

²¹ See Direct Testimony of Kelly Harrison on behalf of Evergy, §IV (May 17, 2022).

1 While there is no iron-clad guarantee that the WC-BB Project will stay within
2 budget, I do agree with KCC Staff's conclusion that NEET-SW's various concessions, cost
3 caps, and guarantees are robust and extensive.²² As KCC Staff points out, NEET-SW's
4 specificity of certain factors which would not be considered exclusions is notable.²³

5 **Q. Do you have any concerns with other parties' recommendations regarding cost cap**
6 **conditions?**

7 A. Yes, I do have concerns with the recommendations from Messrs. Ives, Harrison, and
8 Cooley. All three of these witnesses recommend the Commission add further conditions
9 upon the cost cap provisions of NEET-SW's proposal.

10 Mr. Cooley broadly suggests the Commission could impose "additional, reasonable
11 cost cap requirements on the project as a condition of granting the certification."²⁴

12 Mr. Harrison suggests the Commission could place cost-cap conditions upon
13 approval of the COC and recommends the Commission define certain terms of NEET-
14 SW's guarantees.²⁵

15 Mr. Ives goes so far as to recommend the Commission condition approval of the
16 COC upon the following: "The amount to be placed in Kansas rates should be capped at
17 the amount in NEET's bid, with the only exception being for changes in the project order
18 by SPP. If any additional exclusions are allowed, they should be clearly defined and
19 limited in scope."²⁶

²² See Report and Recommendation from KCC Staff, pg. 12–13 (May 17, 2022).

²³ Report and Recommendation from KCC Staff, pg. 13 (May 17, 2022).

²⁴ Direct Testimony of Jarred Cooley on behalf of SPS, pg. 11 (May 17, 2022).

²⁵ See Direct Testimony of Kelly Harrison on behalf of Evergy, pg. 24–25 (May 17, 2022).

²⁶ Direct Testimony of Darrin Ives on behalf of Evergy, pp. 19–21 list item 6 (May 17, 2022).

1 As a ratepayer advocate, I certainly support the Commission closely monitoring
2 any costs that will impact the bills of the Kansas ratepayers whom I represent. However,
3 my primary concern with these recommendations is whether the Commission has authority
4 to enact such conditions upon the terms of a project bid that has already been awarded by
5 SPP, and if so, I question how such modifications or conditions would be implemented and
6 monitored.

8 **IV. Siting Schedule**

9 **Q. NEET-SW plans to file for siting authority approximately two to three months after**
10 **filing the Application for a COC, which will result in overlapping schedules between**
11 **the two dockets.²⁷ Mr. Ives is opposed to proceeding with overlapping schedules.²⁸**
12 **Do you agree with Mr. Ives?**

13 **A.** Yes, I agree with Mr. Ives' objection to overlapping schedules between the COC
14 application and an application for siting authority. It is my understanding that no witness
15 has emphatically recommended approval of the COC exactly as requested (i.e., without
16 modification or mention of concern). Furthermore, there are parties (Kansas Industrial
17 Consumers and Ms. McGhee Smart) expressly opposed to the issuance of a COC to NEET-
18 SW. Starting the clock on the statutory schedule for the siting application before it is even
19 known whether NEET-SW will be granted a COC is, in essence, "putting the cart before
20 the horse."

²⁷ Application from NEET-SW, ¶14 (Feb 28, 2022).

²⁸ Direct Testimony of Darrin Ives on behalf of Evergy, pg. 5 lns. 19–20 (May 17, 2022).


1 **Q. Does this conclude your testimony?**

2 A. Yes, it does.

VERIFICATION

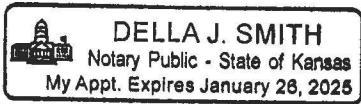
STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

I, Josh P. Frantz, of lawful age and being first duly sworn upon my oath, state that I am a Senior Regulatory Analyst for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.



Josh P. Frantz

SUBSCRIBED AND SWORN to before me this 26th day of May, 2022.





Notary Public

My Commission expires: 01-26-2025.

**DATA REQUESTS TO NEXTERA ENERGY TRANSMISSION SOUTHWEST, LLC
FROM THE CITIZENS' UTILITY RATEPAYER BOARD
DOCKET NO. 22-NETE-419-COC**

Request Date: May 4, 2022

Due Date: May 18, 2022

DATA REQUEST CURB - 15:

Has NextEra been able to quantify the Kansas retail customer benefits associated with the construction and operation of the Project? If so, what are the results of that effort and how will those benefits be realized by Kansas customers? Please include any supporting documents and workpapers for this response.

NEET SOUTHWEST'S RESPONSE TO DATA REQUEST CURB - 15:

Yes. The benefits of the Project are discussed extensively in SPP's 2019 Integrated Transmission Plan (ITP), in which SPP quantified the estimated benefits and rate impacts of the entire 2019 portfolio, including the Project.

On page 1 of the ITP Assessment Report (ITP Report), which is provided as Exhibit BW-3 to the Direct Testimony of Becky Walding, SPP indicates: "The analysis resulted in the recommendation to approve 44 transmission projects, including 166 miles of new extra-high-voltage transmission and 28 miles of rebuilt high-voltage infrastructure. The consolidated portfolio is expected to provide a 40-year benefit-to-cost ratio ranging from 3.5 for Future 1 to 5.8 for Future 2. The net impact to ratepayers is a savings of \$0.04 to \$0.23 on the average retail residential monthly bill."

On page 86 of the ITP Report, SPP indicates: "The economic projects were selected for their ability to provide ratepayer benefits from lower-cost energy by mitigating system congestion and improving markets for both buyers and sellers."

On page 101 of the ITP Report, SPP indicates: "In addition to the projected [Adjusted Production Cost (APC)] savings, the new Wolf Creek-Blackberry 345 kV line provides multiple reliability benefits. Primarily, it resolves declining transient stability margins at the Wolf Creek nuclear plant by adding a fourth 345 kV outlet that is expected to increase system resiliency and reduce system operation risks." *See also* Direct Testimony of Becky Walding at 22-23.

On page 144 of the ITP Report, SPP indicates: "The rate impact to the average retail residential ratepayer in SPP was computed for the recommended portfolio. Rate impact costs and benefits are allocated to the average retail residential ratepayer based on an estimated residential consumption of 1,000 kWh per month. Benefits and costs for the 2029 study year were used to calculate rate impacts. All 2029 benefits and costs are shown in 2019 dollars, discounting at a 2.5% inflation rate."

DATA REQUESTS TO NEXTERA ENERGY TRANSMISSION SOUTHWEST, LLC
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Further, SPP indicates: “There is a monthly net benefit for the average SPP residential ratepayer of 4 cents for Future 1. There is a monthly net benefit for the average SPP residential ratepayer of 23 cents for Future 2.”

Zone	One-Year ATRR Costs	One-Year Benefit	Rate Impact-Cost	Rate Impact Benefit	Net Impact ²⁵
Arkansas	\$2,474	\$3,683	\$0.17	\$0.25	(\$0.08)
Iowa	\$485	(\$51)	\$0.12	(\$0.01)	\$0.14
Kansas	\$7,655	\$11,828	\$0.16	\$0.24	(\$0.09)
Louisiana	\$1,217	\$2,324	\$0.17	\$0.32	(\$0.15)
Minnesota	\$34	(\$4)	\$0.12	(\$0.01)	\$0.14
Missouri	\$3,719	\$12,129	\$0.14	\$0.46	(\$0.32)
Montana	\$139	(\$15)	\$0.12	(\$0.01)	\$0.14
Nebraska	\$4,677	\$658	\$0.11	\$0.02	\$0.09
New Mexico	\$1,223	(\$1,765)	\$0.14	(\$0.20)	\$0.33
North Dakota	\$1,121	(\$118)	\$0.12	(\$0.01)	\$0.14
Oklahoma	\$9,590	\$21,065	\$0.15	\$0.33	(\$0.18)
South Dakota	\$703	(\$74)	\$0.12	(\$0.01)	\$0.14
Texas	\$5,407	(\$99)	\$0.15	(\$0.00)	\$0.15
Wyoming	\$25	(\$3)	\$0.12	(\$0.01)	\$0.14
TOTAL	\$38,468	\$49,558	\$0.14	\$0.18	(\$0.04)

Table 8.16: Future 1 2029 Retail Residential Rate Impacts by State (2019 \$)

1

In Table 8.16 of the ITP Report, SPP indicates that the average net impact of the entire 2019 ITP portfolio, which includes the Project, for Future 1 will consist of an overall reduction of \$0.09 in the average monthly bill of customers in Kansas. This is inclusive of the estimated \$0.04/kWh additional rate impact of the Project on Kansas retail customers discussed in Ms. Walding’s Direct Testimony. In other words, the overall impact to Kansas customers (taking into account both the costs from and the economic benefits of the Project) will be a net savings to Kansas retail customers.

¹ This chart was based on SPP’s cost estimate of \$142.6 million. Given that NEET Southwest’s cost estimate is \$85.2 million—with certain cost containment measures—this would further increase SPP’s estimated benefits.

DATA REQUESTS TO NEXTERA ENERGY TRANSMISSION SOUTHWEST, LLC
FROM THE CITIZENS' UTILITY RATEPAYER BOARD
DOCKET NO. 22-NETE-419-COC

VERIFICATION OF RESPONSE

I have read the foregoing Data Request and Answer(s) thereto and find the answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Citizens' Utility Ratepayer Board any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: **Becky Walding**

Name: Becky Walding

Position: Executive Director, Development
NextEra Energy Transmission, LLC

Dated: May 18, 2022

CERTIFICATE OF SERVICE

22-NETE-419-COC

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 27th day of May, 2022, to the following:

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