

**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)

**REPLY 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 reply 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 March 17, 2017, the parties filed initial comments and supporting affidavits in this docket. On March 30, 2017 and April 13, 2017, the parties held roundtable discussions regarding the substance of this docket. In accordance with the procedural schedule issued in this docket, Sunflower and Mid-Kansas now submit the following reply comments.

4. Sunflower and Mid-Kansas appreciate the time and effort spent by all parties in filing comments and participating in roundtable discussions. While Sunflower and Mid-Kansas do not serve at retail and therefore do not have retail DG customers, their member-owners do. In addition, Sunflower and Mid-Kansas serve as the generation owner and provider for their member-owners. Many of the costs and benefits discussed in this docket revolve around, or effect, generation. Therefore, Sunflower and Mid-Kansas submit these reply comments in their capacity as the generation provider for their member-owners who serve DG customers.

5. The parties have not come to unanimous agreement on the issues. The comments and roundtable discussions were not limited to a few simple issues. However, comments and roundtable discussions in this docket did focus on the following reoccurring themes: (1) whether DG rate design should take into consideration the potential benefits of DG as opposed to remaining under the traditional cost based ratemaking of the Commission, and (2) whether the parties to this docket should engage in a study to evaluate the costs and benefits of DG. Sunflower and Mid-Kansas will focus these reply comments on those two broad issues.

I. DG Rate Design: Potential Benefits vs. Traditional Cost-Based Ratemaking

6. Because the Commission has historically employed traditional cost-based ratemaking principles, Sunflower and Mid-Kansas believe that any future rate design regarding DG customers should employ the same traditional cost-based ratemaking principles that the Commission has historically used. To differ in such approach would be to make an exception to a long-standing principle in Kansas utility ratemaking.

Sunflower and Mid-Kansas agree with sentiments expressed by DG customer representatives in roundtable discussions that DG customers should not be penalized, but should pay for their fair share of the costs of electrical service. In order to meet both objectives in a fair manner, the Commission should continue to view ratemaking as a cost-based endeavor.

7. The Commission has historically used cost-based ratemaking to determine the rates of Kansas utilities. Should a specific credit or rate that is not cost-based but rather includes things like possible environmental benefits be suggested for DG customers, the appropriate venue for such request is the Kansas state legislature. The Commission should continue to employ cost-based ratemaking as it always has.

8. For the aforementioned reasons, rates at the Commission have historically been based on true economics of how much it will cost to provide electric service. If DG saves money for the utility, that money will be returned to the DG customer in the form of lower rates. Any benefit created reduces costs of the utility. Under a cost-based ratemaking approach, a DG customer's added benefit is automatically taken into account in the rate for service back to the DG customer. For example, if DG creates avoided generation costs, then the costs of providing generation service are reduced in the rate back to the DG customer.

9. In addition, it is difficult to determine what benefits DG actually provides. To some degree, all generation provides a societal benefit. Flipping a switch to turn on lights at any moment is certainly a benefit. However, traditional cost-based ratemaking has never allowed a utility to recover more than its costs of that generation, plus an appropriate margin. Further, DG is mostly renewable, and most renewable energy is

intermittent. Therefore, DG must have a backup power supply when the DG resource is not producing energy. That backup power supply is typically an existing utility.

10. While it may be argued that DG provides benefits to the existing utility in the form of avoided generation costs, it could just as easily be argued that the existing utility provides the benefit of backup power supply to a DG customer. Without a backup power supply from existing utilities, DG would not be feasible. The question then becomes, what generation resource is providing benefit to the other generation resource? If it is difficult to ascertain which generation resource is even providing the benefit, how can the Commission assign a value to the benefit that may or may not even be provided?

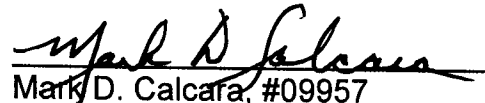
II. Study to Evaluate the Costs and Benefits of DG

11. A frequent topic in the roundtable discussions was the need for a study to evaluate the costs and benefits of DG. Sunflower and Mid-Kansas do not take a position on whether such a study would have value. Moreover, Sunflower and Mid-Kansas do not oppose a study, but do oppose shouldering non-DG customers with the costs of a study to determine a rate to a DG customers. If proponents of DG and entities in the business of manufacturing and selling DG desire a study to show the benefits of DG, Sunflower and Mid-Kansas respectfully request that those entities pay for studies that they desire.

12. In closing, Sunflower and Mid-Kansas incorporate by reference their initial comments filed in this matter.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark D. Calcara", written over a horizontal line.

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VERIFICATION

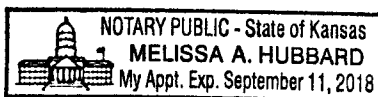
STATE OF KANSAS)
COUNTY OF BARTON) ss:


Mark D. 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 Reply 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.


Mark D. Calcara

SUBSCRIBED AND SWORN to before me this 5th day of May, 2017.




Notary Public

Commission Expires: 9-11-2018

CERTIFICATE OF SERVICE

I do hereby certify that on the 5th day of May, 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:

/s/ Monica A. Seib

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In the Matter of the General Investigation)	
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SUPPORTING AFFIDAVIT OF JAMES BRUNGARDT

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)	ss:
COUNTY OF ELLIS)	

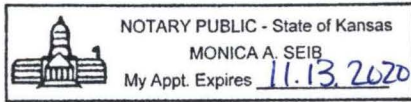
Before me, on the 5th day of May, 2017, personally appeared James Brungardt of Sunflower Electric Power Corporation who, upon being by me duly sworn on oath deposed and said the following:

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 Reply Comments of Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC (the "Reply 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 Reply Comments, and was involved in their preparation. The statements made in the Reply Comments are true and accurate, as of the date hereof.



James Brungardt

SUBSCRIBED AND SWORN to before me this 5 day of May, 2017.



Monica A. Seib
Notary Public

Commission Expires: 11.13.2020

CERTIFICATE OF SERVICE

I do hereby certify that on the 5th day of May, 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/ Monica A. Seib

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