

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 36

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.

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Docket No. 17-KPPE-092-COM

Regarding response to Kansas Power Pool Data Request #3 please provide the following:

- a. Mark up drawings provided in response to 3.a to indicate facilities that have their costs included in Southern Pioneer's LAC rate.
- b. Indicate on the spread sheet provided in response to 3.b the following:
  - i. Mark spreadsheet (electronically) to indicate 34.5 kV facilities between Pratt and Cunningham that currently serve Kingman.
  - ii. Provide label for Column G.

SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 37

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.

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Docket No. 17-KPPE-092-COM

Regarding response to Kansas Power Pool Data Request #5(f) please confirm that Southern Pioneer retail customers are NITS customers under the SPP OATT, or, if not, explain the transmission service that is used to connect Southern Pioneer's retail load to generation resources, and provide a copy of the latest transmission service agreement (NITSA if SPP NITS is used or other if not).

SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 38

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.  
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Docket No. 17-KPPE-092-COM

Please provide cost allocation worksheet alluded to in response to KPP DR#8.

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

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**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 39

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.

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Docket No. 17-KPPE-092-COM

Regarding the response to KPP DR#13(b) please provide the following:

- a. Explanation of why SemCrude was not allocated the entire cost of the SemCrude Distribution Substation.
- b. Identify facilities and related net plant, revenue requirements and associated calculations for any amounts of the SemCrude Transmission Station, the line between the SemCrude Transmission Station and the SemCrude Distribution Station, and the SemCrude Distribution Substation that is included in the Southern Pioneer's 34.5 kV LAC revenue requirements.
- c. Identify facilities and related net plant, revenue requirements and associated calculations for any of the same facilities in (b) that are included in the MKEC OATT.

SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 40

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.

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) Docket No. 17-KPPE-092-COM  
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Regarding Southern Pioneer's service to SemCrude, please provide the following:

- a. On what date did Southern Pioneer, Ninnescah and/or SemCrude begin discussing serving the SemCrude substation over the Ninnescah 115 kV?
- b. All resolutions, contracts, documents, transmission tariff applications, interconnection agreements, FERC or KCC filings, wholesale arrangements and plans regarding the authorization, planning, development, interconnection, construction, operation and/or maintenance of all the facilities necessary for Southern Pioneer to interconnect the SemCrude pumping station to the Ninnescah 115 kV Transmission Line (hereafter the "SemCrude Facilities").
- c. All correspondence (including written, e-mails, texts and other electronic communications, etc.) between or among Southern Pioneer representatives, Southern Pioneer and SemCrude, Southern Pioneer and MKEC, Southern Pioneer and Ninnescah, Southern Pioneer and any vendors, contractors, engineering firms or associated construction companies, and Southern Pioneer and any other third parties regarding the authorization, planning development, interconnection, construction, operation and/or maintenance of the SemCrude Facilities.

SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 41

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.

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Docket No. 17-KPPE-092-COM

Regarding Southern Pioneer's response to KPP DR#14 please provide All correspondence (including written, e-mails, texts and other electronic communications, etc.) between or among Southern Pioneer representatives, Southern Pioneer and SemCrude, Southern Pioneer and MKEC, Southern Pioneer and Ninnescah, Southern Pioneer and any vendors, contractors, engineering firms or associated construction companies, and Southern Pioneer and any other third parties regarding the following:

- a. KCC Docket No. 10-NNHE-326-CON
- b. Sizing the SemCrude Facilities adequately to serve the entire City of Kingman load.
- c. SPP's 2009 AG2 aggregate study.

SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 42

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.

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Docket No. 17-KPPE-092-COM

Regarding Southern Pioneer's response to Kansas Power Pool's Data Request #19 please provide All correspondence (including written, e-mails, texts and other electronic communications, etc.) between or among Southern Pioneer representatives, Southern Pioneer and National Beef, Southern Pioneer and any vendors, contractors, engineering firms or associated construction companies, and Southern Pioneer and any other third parties regarding the National Beef Bypass.

SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 43

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.

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Docket No. 17-KPPE-092-COM

Please provide entire response to all Data Requests by KCC Staff and other parties to date and on an ongoing basis.

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_



**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 44

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.

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Docket No. 17-KPPE-092-COM

Please provide the following:

- a. Identify all facilities currently owned by Southern Pioneer by which energy is physically delivered from the MKEC transmission system to the City of Kingman.
- b. The initial in-service date for each of these facilities.
- c. The initial gross book value for each of these facilities.
- d. The date(s), reason, nature, and capitalized costs of any replacements, improvements and or other modifications.
- e. The purchase price paid by Southern Pioneer for these facilities, by FERC or related account.
- f. The depreciation rate used by Southern Pioneer with respect to each of the facilities by FERC or related account.
- g. The current net (depreciated) book value recorded on Southern Pioneer's books for the facilities.
- h. The O&M costs for these facilities on an annual basis for each of the past 5 years.
- i. All correspondence (including written, e-mails, texts, workplans or work orders, and other electronic communications, etc.) between or among Southern Pioneer representatives, Southern Pioneer and any vendors, contractors, engineering firms or associated construction companies, and Southern Pioneer and any other third parties regarding these facilities.

SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 45

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.

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Docket No. 17-KPPE-092-COM

Regarding Southern Pioneer's response to Kansas Power Pool's Data Request #27 please provide All correspondence (including written, e-mails, texts, workplans or work orders, and other electronic communications, etc.) between or among Southern Pioneer representatives, Southern Pioneer and Kansas Power Pool, and Southern Pioneer and any other third parties regarding KPP's obligation to connect to the Ninnescah Transmission Line through Southern Pioneer's 34.5 kV system at the SemCrude substation.

SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 46

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.

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Docket No. 17-KPPE-092-COM

Regarding Southern Pioneer's response to Kansas Power Pool's Data Request #29 please provide the following:

- a. Location, geographically and electrically (including which line, substation, etc.) of the 115 capacitor banks.
- b. Explain why these 115 kV facilities are Southern Pioneer's and not MKEC's.
- c. Explain how the cost of each of these 115 kV facilities are recovered.
- d. Explain specifically how each of these 115 kV capacitor banks benefit KPP loads.

SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 47

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.

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Docket No. 17-KPPE-092-COM

Do Wholesale customers pay more for the same usage of Southern Pioneer's 34.5 kV system than retail customers?

SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 48

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.

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Docket No. 17-KPPE-092-COM

Regarding Southern Pioneer's response to Kansas Power Pool's Data Request #32 please provide All correspondence (including written, e-mails, texts, workplans or work orders, and other electronic communications, etc.) between or among Southern Pioneer representatives, Southern Pioneer and MKEC, Southern Pioneer and other MKEC members, Southern Pioneer and Ninnescah, and Southern Pioneer and any other third parties regarding Mid-Kansas acquisition of the Ninnescah 115 kV line.

SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO SOUTHERN PIONEER ELECTRIC COMPANY**

Request No. 49

Date of Request: June 22, 2017

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In the Matter of the Complaint of Southern Pioneer  
Electric Company Against the Kansas Power Pool  
Regarding Bypass and Duplication of Service for  
34.5kV Delivery to the City of Kingman.

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Docket No. 17-KPPE-092-COM

Please provide copies of all written and electronic documents and related minutes of Pioneer and/or Southern Pioneer Board meetings related to Kingman use of the SemCrude substation, MKEC acquisition of the Ninnescah 115 kV line or decision not to object to KPP bypass of Southern Pioneer's facilities for the City of Greensburg and the Greensburg Wind Farm.

SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: SOUTHERN PIONEER ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find 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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 22nd day of June, 2017, the foregoing Information Requests Nos. 36-49 were electronically served on:

GLEND A CAFER, ATTORNEY  
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JAMES BRUNGARDT, REGULATORY AFFAIRS ADMINISTRATOR  
SUNFLOWER ELECTRIC POWER CORPORATION  
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By: /s/ Amy Fellows Cline  
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*Attorneys for Kansas Power Pool*