

**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.)

SUNFLOWER ELECTRIC POWER CORPORATION
AND MID-KANSAS ELECTRIC COMPANY, LLC
RESPONSE TO REPLY COMMENTS OF COMMISSION STAFF

COMES NOW, Sunflower Electric Power Corporation ("Sunflower") and Mid-Kansas Electric Company, LLC ("Mid-Kansas"), by and through their counsel, and hereby submits their comments in response to the Reply Comments of Commission Staff filed on May 22, 2017.

Responses to Specific Questions:

Staff seeks comments from Sunflower and Mid-Kansas on the following:

- (a) ***Sunflower and Mid-Kansas*** refer to the results of the RCAR II process in paragraph 8 on page 4 of their comments. The comments state that Mid-Kansas's projected benefit to cost (B/C) ratio is 1.28 over the next 40-years, and Sunflower's B/C ratio is 3.73, for a combined B/C ratio of 1.87. Sunflower states that it believes most of the benefits assigned to its system are not sustainable for the next 40-years, as they are "mostly skewed based on congested hours where the wind gets trapped in its zones and the price of purchasing energy becomes very low." The companies opine that it is not realistic to assume Sunflower and Mid-Kansas will continue to benefit from trapped wind for 40 years, "as more transmission will be built to ease congestion and will drive energy prices higher" in the wind-trapped zones.

*Why do **Sunflower and Mid-Kansas** believe that the results of the RCAR process are skewed toward wind-congested hours? The RCAR II study Report describes that Adjusted Production Cost estimates were developed for years 2020, 2025, and 2035, which would seem to contradict Sunflower's claims that the RCAR II study relied too heavily on current wind congestion. Any explanation or clarification of these points would be helpful to understand the current value or possible criticisms of the RCAR II study results.*

Response:

In approving SPP's Highway/Byway (H/B) cost allocation methodology, the Federal Energy Regulatory Commission (FERC) also approved a requirement that SPP review the "reasonableness of the regional allocation methodology and factors (X% and Y%) and the zonal allocation methodology at least once every three years." The review is required to "determine the cost allocation impacts of the Base Plan Upgrades approved for construction issued after June 19, 2010 to each pricing Zone within the SPP Region." Thus, the purpose of the analysis is to measure by zone the cost allocation impacts of SPP's Highway/Byway methodology. The review is referred to as the "Regional Cost Allocation Review" or "RCAR".

The RCAR uses eight metrics to calculate benefits for each SPP zone. The most significant benefit metric in the RCAR is the Adjusted Production Cost (APC). The APC captures the monetary cost associated with fuel prices, run times, grid congestion, ramp rates, energy purchases, energy sales, and other factors directly related to energy production by generating resources in SPP. APC is calculated by adding a zone's production cost to the zone's purchases and subtracting out their sales.

It is clear from looking at the RCAR II study and the 2017 ITP10 study that over 90% of Mid-Kansas' energy related benefits (APC) comes from wind congestion. In our zone, this congestion results from an inability for generation (wind) to exit the zone.¹ This is apparent because the 2017 ITP10 study projected impact on Mid-Kansas of building the new transmission proposed in the initial 2017 ITP10 was to reduce Mid-Kansas's APC benefits by 92% of the benefit projected in RCAR II. Within our understanding, this can only occur if generator (wind) congestion is being reduced. It also demonstrates that the 40-year projected APC benefits in the RCAR II study were only good until the next transmission project. These benefits are overwhelmingly the result of wind congestion, and as demonstrated by the 2017 ITP10 impacts, these benefits are unlikely to be sustained over the 40-year period reflected in the RCAR study.

¹ Prior to the increased wind penetration in our zone, our zone rarely experienced export congestion. As wind penetration increased our congestion hours also increased.

Also, some of the benefit allocators used by SPP in the RCAR attribute benefits to the zonal load based on “flow”. This misses the fact that “flow” and “load” are completely different concepts. If Sunflower had no load at all but had wind farms in its zone exporting to other zones, Sunflower would have “flow” but no “load”. RCAR attributes benefits to the zonal load (Kansas customers) based on flow. Those flows are not all attributable to loads in our zone. The Sunflower Zone (which includes Mid-Kansas) is dominated by wind, unlike most of SPP. Sunflower has 2.2% of load in SPP, but hosts 17% of SPP wind. So, concepts that may make sense in general for SPP, may be inappropriate for zones highly dominated by exporting generators. See also the wind statistics in the response to question (d) for a greater understanding of the magnitude of wind generation in western Kansas.

Below is a table which shows the APC benefits modeled by the RCAR II study and compares them to the benefit change modeled in the 2017 ITP10. Our experience is that because we are such a small zone, our numbers coming out of such studies are subject to large swings in benefits assigned to the zone. This is evident both from this table and also from the benefit/cost ratio changes from RCAR I and RCAR II.

Entity	RCAR2 APC Savings from ALL Projects 40-Year PV	APC Benefits (Reduction) of Recommended 2017 ITP10	Percent Impact
Mid-Kansas	\$60mm	\$(55)mm	(92%)
Sunflower	\$83mm	\$(8)mm	(10%)
Total	\$143mm	\$(63)mm	(44%)

Another issue with the RCAR APC calculation under wind congested scenarios is the appropriateness of economic model for the analysis. To calculate the impact of new H/B transmission projects, these projects must be removed from the models to see the difference with and without transmission. Many of these transmission projects are required or facilitate the delivery of wind to other zones. However, when removing the transmission projects, the wind that is in the base case can't move out of the host zone since this wind was added after the transmission was built. So, removing transmission will result in trapped wind that has no path to go outside of the host zone (The model

does not recognize that wind interconnection was granted subject to transmission upgrades).

To overcome this issue of “trapped” wind generation within the Sunflower/Mid-Kansas zone, the RCAR study looked at several methods. In all these scenarios, the RCAR study tried to deal with the trapped wind generation issue by moving and/or removing some of the wind when removing all the H/B transmission facilities. In general, results showed Sunflower and Mid-Kansas are each assigned additional APC benefits of over \$20 million (results are 1-year APC savings, 2034 \$²) after the removals. The removal assumptions resulted in benefits that should not be included in the actual zonal benefits to Sunflower or Mid-Kansas as they are based on the congestion created by removing the transmission that should have been there to serve the new wind, not the loads in the area. The ESWG approved the Hybrid method and that is how the RCAR calculated the APC benefits for Sunflower and Mid-Kansas which inflated the benefits based on wind congestion created by the method of the calculation.

The RCAR process calculates the APC for assigning savings in generation cost for each pricing zone due to building new or upgrading existing transmission under the H/B cost allocation method. Any SPP transmission built in the Sunflower or Mid-Kansas zone arising out of the SPP transmission process will follow the H/B cost allocation method which for the most part allocates most of the cost to the loads in the geographical zone of the transmission project, regardless of who benefits from the new transmission.

In the latest RCAR, the APC benefits for the combined Sunflower/Mid-Kansas totaled \$143 million over 40 years. This amount of savings resulted from an unrealistic assumption that the congestion will stay as is today and Sunflower will benefit over 40 years which is not realistic. As SPP introduces new projects in every planning cycle, the assumption that congestion will remain for 40 years is false.

² See RCAR II Modeling Discussion, ESWG, August 20, 2015

- (b) *In response to Question (a) on page 8, **Sunflower and Mid-Kansas** state, “The current studies performed by SPP provide a wide range of assessments of value for the membership. However, current studies are prospective in nature and lack an assessment to determine if the projected costs and benefits actually occurred. If a study is required, the study parameters should include an evaluation of the actual results to the projections and adjust for significant changes in underlying assumptions.”*

*Which studies performed by SPP are **Sunflower and Mid-Kansas** referring to that should be evaluated for actual results? RCAR II, Rate Impact Analysis, Value of Transmission? Are there specific elements of these studies that should be compared to actual results? This is an area that would be helpful to have **SPP** and **other Kansas utilities** address. Are there elements of the RCAR II analysis – for example, Adjusted Production Cost estimates – that can be back-cast, or evaluated on an ex-post basis to validate whether or not the cost savings actually came to fruition? What elements of the RCAR analysis can be back-cast or estimated based on actual data for discrete periods of time for Kansas utilities? Would that analysis be more or less cost effective than the estimated costs of a new study, such as the one described by KCP&L?²⁸ Additionally, could the Rate Impact Analysis (RIA) be run for historical periods then compared to the projected rate impacts assumed in the RIA? (The RIA estimates the impact of SPP Base Plan funded projects on a typical retail customer's bill using a base year 2025 calculation/comparison.) This study only attempts to model cost impacts/savings that can be monetized to a customer's bill. Could this evaluation be performed on a historical cost basis and then re-evaluated every 5 years or some other period? Staff recognizes that this study would not necessarily be comprehensive. However, would it, nonetheless, address **CURB's** desire for a straightforward, transparent calculation of the retail ratepayer cost/benefit associated with SPP participation? Staff welcomes comments from **all Kansas utilities** and **SPP** on the above questions.*

Response:

Primarily we were referring to the RCAR and the Value of Transmission, as each are closely related. The Rate Impact Analysis, although based on the RCAR, is more of a point in time impact study. In part, the comment is based on the general design of the RCAR study. It was noted in SPP meetings by SPP's consultant, Brattle Group, that the costs in the RCAR study are front loaded and the benefits are back loaded. The design of the RCAR looks at only future years, not past historical years. This means that to the extent that costs decline over time and benefits increase over time, each subsequent RCAR will report higher and higher benefit to cost ratios, even if no projects change and no assumptions change. One could call this “B/C inflation”. An example is in Table-1 below.

Table 1								
Year	RCAR1-Benefit	RCAR1-Cost		RCAR2-Benefit	RCAR2-Cost		RCAR3-Benefit	RCAR3-Cost
1	\$150	\$350						
2	\$200	\$300						
3	\$250	\$250		\$250	\$250			
4	\$300	\$200		\$300	\$200			
5	\$350	\$150		\$350	\$150		\$350	\$150
NPV@8%	\$968	\$1029		\$767	\$522		\$324	\$139
B/C Ratio	0.97			1.47			2.33	

In part, the comment was also intended to address the APC, Mitigation of Transmission Outage Costs, and the underlying drivers of cost of fuel. SPP's RCAR I study reported that these metrics are relatively sensitive to the fuel price assumptions. The higher the fuel prices the higher the benefits. These two benefits are the largest and third largest benefits in both the RCAR and RCAR II studies. The RCAR I study modeled a 27.5% increase in gas prices that resulted in an 18.5% increase in APC and Mitigation of Transmission Outage Costs benefits. RCAR I is based on a \$4.18 Henry Hub price in 2012 growing to \$4.89 in 2018. The RCAR II assumed 15-30% higher prices than in RCAR I (p. 47 RCAR II, July 11, 2016). These prices in the early years that are weighted greatest in the B/C ratio NPVs are higher than what we have experienced. Over the last five years, only one year (2014) has achieved these price levels.

In part, this comment raises our concern that benefits in these studies are based on assumptions about when and how benefits will be achieved. For example, the benefit of Capacity Savings from Reduced On-Peak Losses is a real benefit. However, with the amount of capacity currently in SPP and the continued need to recover the costs of that capacity, the timing and achievability may be dependent on both business and regulatory decisions. Similarly, some existing generation units have long-term fuel supply or off-take contracts associated with them. In the near and intermediate term, availability of access to lower priced energy may not result in lower cost energy being actually achieved. Without a way to compare the benefit assumptions of RCAR to actual

results, the benefits presented cannot be understood as real or achieved. As an example, Sunflower/Mid-Kansas have long-term, fixed price, wind contracts. These contracts were entered into when Kansas had a renewable energy standard. We remain obligated under these contracts to take this energy and pay the contract price, even if lower price energy is made available through new transmission projects. Availability does not necessarily mean achievability. Similar situations can exist where long-term fuel supply contracts have been signed for gas or coal plants. In effect, there are unavoidable costs in the system which should not be assumed to be avoidable.

- (c) *At the top of Page 11, **Sunflower and Mid-Kansas** comment that “The RCAR II study is prospective in nature and with certain refinement would be a usable and useful tool.” Please discuss in detail what specific refinements Sunflower and Mid-Kansas believe would be necessary to make the RCAR II study a usable and useful tool? Do the **other Kansas utilities or SPP** believe that certain refinements are necessary for the RCAR study to be a usable and useful tool? If so, please identify which refinements are necessary or possible.*

Response:

As part of the RCAR II lessons learned process, we raised the following observations and suggestions which were formally submitted to SPP:

- As discussed above, we recommend also reporting on the actually achieved costs and benefits in each year (see discussion above), as opposed to only looking at the modeled costs and benefits in the RCAR process.
- Converting the costs and benefits to levelized values to prevent “B/C inflation” described above.
- Separately capturing the fuel cost related benefits to allow for easier scaling as fuel prices fluctuate, as described above.
- Incorporating the Rate Impact Analysis (RIA) into the RCAR to add greater visibility to the customer impacts.
- More detailed review of the special case where exported generation (renewables), not load, is the predominant user of the transmission system.

- Acknowledging and quantifying the role of unavoidable costs in achieving (or not achieving) modeled benefits, as discussed in the prior question.
- We initially advocated for continuing to run B/C calculations for all projects from the date of installation, rather than only forward from the date of the study, but there are clearly technical and resource constraints that make this unfeasible. Some of the above suggestions attempt to compensate for this limitation.

RCAR Remedies

Sunflower/Mid-Kansas also suggests that if the results for a zone following an RCAR are below 0.8 B/C threshold, SPP staff evaluate and recommend possible mitigation remedies for the zone. In Figure 5.1 of the RARTF Report, the RARTF provided a list of mitigation remedies SPP staff should consider for study and to be made part of the report. The purpose of the evaluations was to determine potential remedies that bring the zone above the threshold.

As set forth in the following table, the first two possible remedies do not result in immediate relief to transmission rates as they require investment with 40 years' benefit return. The benefit return can be in APC savings, mandated reliability projects, loss savings and others that do not translate into consumer bills as savings. To make RCAR more useful to entities that focus on rate reduction, Sunflower recommends that an entity with lower B/C ratios has the option to select the best remedy they would like to have instead of defaulting to number 1 in the table as the only automatic option that an entity must take.

Figure 5.1
Potential Remedies

Remedy	Entity with Authority/Duty to Implement
(1) Acceleration of planned upgrades;	SPP BOD
(2) Issuance of NTCs for selected new upgrades;	SPP BOD
(3) Apply Highway funding to one or more Byway Projects;	RSC, SPP BOD & FERC
(4) Apply Highway funding to one or more Seams Projects;	RSC, SPP BOD & FERC
(5) Zonal Transfers (similar to Balanced Portfolio Transfers) to offset costs or a lack of benefits to a zone;	RSC, SPP BOD & FERC
(6) Exemptions from cost associated with the next set of projects;	RSC, SPP BOD & FERC
(7) Change Cost Allocation Percentages.	RSC, SPP BOD & FERC

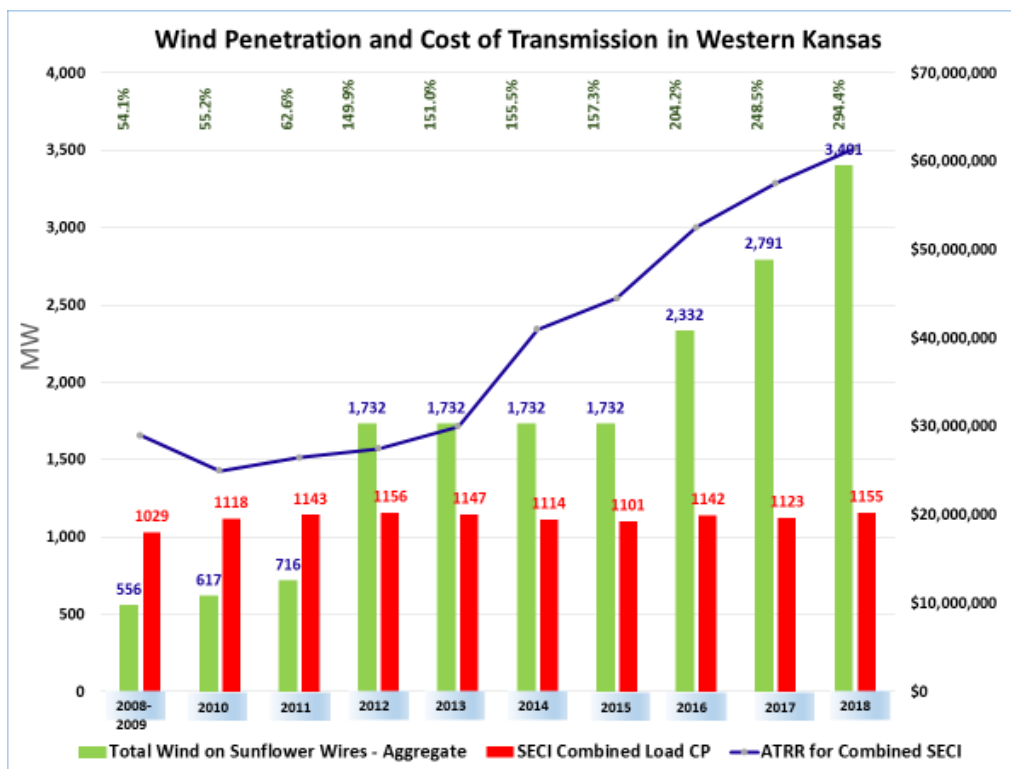
Also, with the RCAR study conducted once every six years instead of once every two to three years, we believe that would harm entities like us that have significant amounts of new renewable generation connecting on a yearly basis. With such a long period between RCAR studies, Sunflower/Mid-Kansas may be significantly harmed. If the Sunflower/Mid-Kansas system was very static from transmission builds, six years is fine, but with the many activities on the system we recommend that the RCAR study be conducted once every two to three years as it was originally approved by FERC.

- (d) *At Paragraphs 8, 9, and 10 on page 5, **Midwest Energy** echoes SPP's comments that additional studies may not be needed for the Commission to conclude that SPP membership is benefiting Kansas utilities/customers. Midwest also repeats SPP's assertion that "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." Specifically speaking, what "more details" can SPP provide that is specific to Kansas? At paragraph 10, Midwest states, "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." Again the question here is, what specific additional data can be "supplemented" with Kansas specific data that might help determine that Kansas customers are benefiting today from Kansas utility membership in SPP. If such additional details and information exist and can be relatively easily provided, **SPP and the utilities** should describe this information with some specificity so that the Commission can make an informed decision about whether any additional cost benefit studies need to be undertaken.*

Response:

From the Sunflower/Mid-Kansas perspective, the studies that SPP have done are very helpful in identifying who benefits from the transmission and to what degree. The issue is the accuracy of the benefits assigned to the zones. Sunflower believe that all methods used in the RCAR are appropriate to measure SPP as a whole, but they are problematic when these methods are used to identify zonal benefits within the SPP region. Sunflower/Mid-Kansas is benefiting from the transmission, but are the costs warranted when considering the impact on retail and wholesale customers' rates? In the last six years, the zonal Byway projects for Sunflower/Mid-Kansas cost over \$172 million with the direct assigned zonal component of over \$94 million to Sunflower and Mid-Kansas zones. The additional transmission came in periods of no load growth in the geographical area of Sunflower and Mid-Kansas zones.

The graph below shows our ATRR component versus load and wind integration. As evident, the change in load was very minimal while the cost of transmission doubled in less than eight years. Sunflower understands that there is a production cost benefit for the transmission in our zone and we also understand there is a benefit of new transmission when renewables are not generating, but are these benefits sufficient to warrant the cost to local customers? The SPP membership needs to invest more in their current studies to better explain the claimed benefits and to add more tools to their analyses to incorporate rate impact into their analysis. As rates are the foundation for justifying new investments, SPP should consider a weight factor for each benefit metric to reflect customers' rate impact. In the current RCAR, all metrics have the same weight. Metrics that impact customers' rates should have a greater weight than other metrics.



The graph above shows our ATRR component versus load and wind integration. The following statistics further illustrate how wind dominates the Sunflower zone:

- Sunflower has 2.2% of load in SPP, but hosts 17% of SPP wind.
- Wind (nameplate) in Sunflower is 285% of Sunflower Peak Load. Wind in SPP is 31% of SPP Peak Load.
- Sunflower zone exported wind to other SPP members in 61.89% of the hours in 2016. This included 9 of the 10 highest annual peak hours and 11 of the 12 monthly peak hours.

Sunflower also recommends that SPP conduct a study “periodically” to evaluate Transmission Distribution Analysis for zones with more wind than load. In 2016, Sunflower/Mid-Kansas have exported wind more than 60% of the time. This analysis will be used to determine which transmission facilities in the wind rich zones are used primarily for regional flows and therefore fulfill more of a highway function on an integrated transmission network. The H/B cost allocation zonal component should be adjusted for those zones to reflect how their Byway facilities are being used. As

mentioned above, in 2016, Sunflower/Mid-Kansas zone exported wind more than 60% of the time. In some ways, this can be seen as the transmission facilities within the zone enabling the export of wind 60% of the time. The cost allocation should reflect the use of those facilities (i.e. for Byway projects, cost allocation should be 60% regional and 40% zonal instead of the normal 33% regional and 67% zonal). If wind continue to increase and Sunflower/Mid-Kansas increase the export of renewable energy out of their zone to let us say 90% of the time, then the cost allocation should be 10% zonal and 90% regional as most of the use of the lines is to export wind to SPP region. This concept should be adopted by SPP members to enable small (load) transmission providers to build the extra transmission in their zones without driving rates higher to consumers due to having the wind located in their footprint. Such transmission provides very minimal zonal benefit to the load in the zone.

Note that Current Highway/Byway cost allocation method was based on Transmission Distribution Analysis conducted by SPP back in 2009 where wind assumptions were much lower than what we are expecting in the next few years (25% penetration) Zonal flows 98% for the Balanced Portfolio EHV facilities and 77% for existing SPP EHV facilities, 38% for the 115 – 138 kV facilities, 14% for the existing 69 kV facilities

Sunflower acknowledges that the cost allocation method should not be solely based on renewable power flow exiting the zone. Other factors need to be considered when determining appropriate cost allocation that is just and reasonable. However, we believe that the use of the lower voltage lines to export wind to other SPP zones should be considered in the H/B methodology. SPP tariff (Attachment J) already includes a provision for wind related projects (the wind rule). Our recommendation would fall under similar consideration. We are wanting to particularly look at the cost impact and cost allocation for entities which are host to significant amounts of renewables.

Another factor to consider in bringing value to Kansas customers is to align SPP studies so as not to allow free riders on transmission. SPP has two processes that generators can use to allow access to the grid--the Generation Interconnection (GI) and the Transmission Service study (Aggregate Study). A new wind or solar interconnection can go through both processes or studies without incurring any transmission cost. If there is

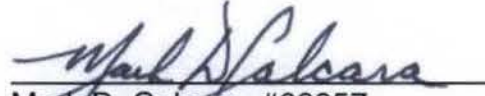
enough transmission capacity in the host zone, then there is no additional cost to the interconnection customer, or revenue to the host zone, as the transmission capacity is consumed. However, the SPP ITP process can identify and require construction of new transmission projects and upgrades in the host zone that have been caused by the interconnection customer. This is due to that fact that the ITP process uses more stringent standards than the GI and Aggregate Study. For example, approximately 600 MW of new generation is connecting at the Mingo substation with no new transmission improvements. The new generation is consuming transmission capacity, thereby reducing the capacity available to serve the local customers in the future which was paid for by the local customers. This reduced capacity could result in additional future transmission projects paid by the local customers to serve future loads.

The consumption of existing system capacity on the host entity transmission system is not considered when allowing interconnection of new generation facilities.

NERC compliance analysis is included in the ITP process but not in the GI and the Aggregate study which may result in ITP process identifying additional transmission projects. This places an inequitable burden on the host entity as they are responsible for maintaining NERC compliance standards which may result in transmission projects being identified in the ITP process which is caused by the interconnections in the GI and the Aggregate Study. The cost allocation in the ITP process is solely H/B which is geographical and voltage dependence which is very different than the cost allocation in the GI and the Aggregate study is mainly direct assignment to the interconnection customer.

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

Respectfully submitted,



Mark D. Calcara, #09957
Taylor P. Calcara, #25561
Watkins Calcara, Chtd.
Suite 300, 1321 Main Street
P.O. Drawer 1110
Great Bend, Kansas 67530
(620) 792-8231 telephone
(620) 792-2775 facsimile

**Attorneys for Sunflower Electric
Power Corporation and Mid-Kansas
Electric Company, LLC**

VERIFICATION

STATE OF KANSAS)
COUNTY OF ELLIS) ss:

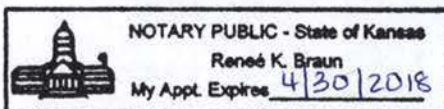
Mark D. Calcara, of lawful age, being first duly sworn on oath, states:

That he is an Attorney for Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC; that he has read the above and foregoing 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 21st day of June, 2017.





Notary Public – Renee K. Braun

Commission Expires: April 30, 2018

CERTIFICATE OF SERVICE

I do hereby certify that on the 21st day of June, 2017, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing Comments with a copy e-mailed to:

/s/ Renee K. Braun

Service list last modified May 23, 2017

W. ROBERT ALDERSON, JR., ATTORNEY
ALDERSON ALDERSON WEILER CONKLIN
BURGHART & CROW LLC
2101 SW 21ST STREET (66604)
TOPEKA, KS 66604
BOBA@ALDERSONLAW.COM

BRENT BAKER
EMPIRE DISTRICT ELECTRIC COMPANY
602 S JOPLIN AVE (64801)
PO BOX 127
JOPLIN, MO 64802
BBaker@empiredistrict.com

JAMES G. FLAHERTY, ATTORNEY
ANDERSON & BYRD, L.L.P.
216 S HICKORY
PO BOX 17
OTTAWA, KS 66067
jflaherty@andersonbyrd.com

ANGELA CLOVEN
EMPIRE DISTRICT ELECTRIC COMPANY
PO BOX 127
602 S JOPLIN AVENUE
JOPLIN, MO 64802-0127
acloven@empiredistrict.com

THOMAS J. CONNORS, Attorney at Law
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
tj.connors@curb.kansas.gov

AARON DOLL
EMPIRE DISTRICT ELECTRIC COMPANY
602 S JOPLIN AVE (64801)
PO BOX 127
JOPLIN, MO 64802
ADoll@empiredistrict.com

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
t.love@curb.kansas.gov

FRED MEYER
EMPIRE DISTRICT ELECTRIC COMPANY
602 S JOPLIN AVE (64801)
PO BOX 127
JOPLIN, MO 64802
FMeyer@empiredistrict.com

DAVID W. NICKEL, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
D.NICKEL@CURB.KANSAS.GOV

BRYAN OWENS, ASSISTANT DIRECTOR OF
PLANNING & REGULATORY
EMPIRE DISTRICT ELECTRIC COMPANY
602 S JOPLIN AVE (64801)
PO BOX 127
JOPLIN, MO 64802
bowens@empiredistrict.com

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.smith@curb.kansas.gov

DOUGLAS L. HEALY, ATTORNEY AT LAW
HEALY LAW OFFICES, LLC
3010 E BATTLEFIELD STE A
SPRINGFIELD, MO 65804
doug@healylawoffices.com

SHONDA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
sd.smith@curb.kansas.gov

Sunflower and Mid-Kansas Response to Staff's Reply Comments
17-SPPE-117-GIE

TERRY M. JARRETT, Attorney at Law
HEALY LAW OFFICES, LLC
514 East High Street
Suite 22
Jefferson City, MO 65101
terry@healylawoffices.com

HEATHER H STARNES, ATTORNEY
HEATHER H STARNES
12 PERDIDO CIRCLE
LITTLE ROCK, AR 72211
heather@healylawoffices.com

JAMES W. BIXBY, ATTORNEY - REGULATORY
& LEGISLATIVE
ITC GREAT PLAINS, LLC
601 THIRTEENTH STREET NW
STE 710S
WASHINGTON, DC 20010
jbixby@itctransco.com

HOLLY FISHER, ATTORNEY-CAP.
PROJECTS & MAINTENANCE
ITC GREAT PLAINS, LLC
3500 SW FAIRLAWN RD STE 101
TOPEKA, KS 66614-3979
hfisher@itctransco.com

DENISE M. BUFFINGTON, CORPORATE
COUNSEL
KANSAS CITY POWER & LIGHT COMPANY
ONE KANSAS CITY PL, 1200 MAIN ST 19th
FLOOR (64105)
PO BOX 418679
KANSAS CITY, MO 64141-9679
DENISE.BUFFINGTON@KCPL.COM

ROBERT J. HACK, LEAD REGULATORY
COUNSEL
KANSAS CITY POWER & LIGHT COMPANY
ONE KANSAS CITY PL, 1200 MAIN ST 19th
FLOOR (64105)
PO BOX 418679
KANSAS CITY, MO 64141-9679
ROB.HACK@KCPL.COM

ROGER W. STEINER, CORPORATE COUNSEL
KANSAS CITY POWER & LIGHT COMPANY
ONE KANSAS CITY PL, 1200 MAIN ST 19th
FLOOR (64105)
PO BOX 418679
KANSAS CITY, MO 64141-9679
roger.steiner@kcpl.com

MARY TURNER, MANAGER REGULATORY
AFFAIRS
KANSAS CITY POWER & LIGHT COMPANY
ONE KANSAS CITY PL 1200 MAIN ST (64105)
PO BOX 418679
KANSAS CITY, MO 64141-9679
MARY.TURNER@KCPL.COM

ANTHONY WESTENKIRCHNER, SENIOR
PARALEGAL
KANSAS CITY POWER & LIGHT COMPANY
ONE KANSAS CITY PL, 1200 MAIN ST 19th
FLOOR (64105)
PO BOX 418679
KANSAS CITY, MO 64141-9679
anthony.westenkirchner@kcpl.com

MICHAEL DUENES, ASSISTANT GENERAL
COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
m.duenes@kcc.ks.gov

ANDREW FRENCH, SENIOR LITIGATION
COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
a.french@kcc.ks.gov

STEPHAN SKEPNEK, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
s.skepnek@kcc.ks.gov

PAUL MAHLBERG, GENERAL MANAGER
KANSAS MUNICIPAL ENERGY AGENCY
6300 W 95TH ST
OVERLAND PARK, KS 66212-1431
MAHLBERG@KMEA.COM

SAM MILLS, DIRECTOR PROJECT AND
ASSETS MANAGEMENT
KANSAS MUNICIPAL ENERGY AGENCY
6300 W 95TH ST
OVERLAND PARK, KS 66212-1431
MILLS@KMEA.COM

Sunflower and Mid-Kansas Response to Staff's Reply Comments
17-SPPE-117-GIE

MARK CHESNEY, CEO & GENERAL
MANAGER
KANSAS POWER POOL
100 N BROADWAY STE L110
WICHITA, KS 67202
mchesney@kansaspowerpool.org

JAMES GING, DIRECTOR ENGINEERING
SERVICES
KANSAS POWER POOL
100 N BROADWAY STE L110
WICHITA, KS 67202
jging@kansaspowerpool.org

LARRY HOLLOWAY, ASST GEN MGR
OPERATIONS
KANSAS POWER POOL
100 N BROADWAY STE L110
WICHITA, KS 67202
lholloway@kansaspowerpool.org

CURTIS M. IRBY, GENERAL COUNSEL
KANSAS POWER POOL
LAW OFFICES OF CURTIS M. IRBY
200 EAST FIRST ST, STE. 415
WICHITA, KS 67202
CMIRBY@SBCGLOBAL.NET

WILLIAM DOWLING, VP ENGINEERING &
ENERGY SUPPLY
MIDWEST ENERGY, INC.
1330 CANTERBURY ROAD
PO BOX 898
HAYS, KS 67601-0898
BDOWLING@MWENERGY.COM

THOMAS E. WRIGHT, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY
CHTD
800 SW JACKSON STE 1310
TOPEKA, KS 66612-1216
TWRIGHT@MORRISLAING.COM

ANNE E. CALLENBACH, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
acallenbach@polsinelli.com

FRANK A. CARO, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
fcaro@polsinelli.com

KANDI HUGHES, ATTORNEY
SOUTHWEST POWER POOL, INC.
201 WORTHEN DR
LITTLE ROCK, AR 72223
khughes@spp.org

TESSIE KENTNER, ATTORNEY
SOUTHWEST POWER POOL, INC.
201 WORTHEN DR
LITTLE ROCK, AR 72223
tkentner@spp.org

PAUL SUSKIE, Executive Vice-President
Regulatory and Legal
SOUTHWEST POWER POOL, INC.
201 WORTHEN DR
LITTLE ROCK, AR 72223
psuskie@spp.org

AMY FELLOWS CLINE, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
amycline@twgfirm.com

TIMOTHY E. MCKEE, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
TEMCKEE@TWGFIRM.COM

MARK D. CALCARA, ATTORNEY
WATKINS CALCARA CHTD.
1321 MAIN ST STE 300
PO DRAWER 1110
GREAT BEND, KS 67530
MCALCARA@WCRF.COM

TAYLOR P. CALCARA, ATTORNEY
WATKINS CALCARA CHTD.
1321 MAIN ST STE 300
PO DRAWER 1110
GREAT BEND, KS 67530
TCALCARA@WCRF.COM

Sunflower and Mid-Kansas Response to Staff's Reply Comments
17-SPPE-117-GIE

MO AWAD, DIRECTOR, REGULATORY
COMPLIANCE
WESTAR ENERGY, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
mo.awad@westarenergy.com

CATHRYN J. DINGES, SENIOR CORPORATE
COUNSEL
WESTAR ENERGY, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
cathy.dinges@westarenergy.com

JEFFREY L. MARTIN, VICE PRESIDENT,
REGULATORY AFFAIRS
WESTAR ENERGY, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
JEFF.MARTIN@WESTARENERGY.COM

PATRICK T. SMITH, CORPORATE COUNSEL
WESTAR ENERGY, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
PATRICK.SMITH@WESTARENERGY.COM