

**Mid-Kansas Electric Company, LLC**  
Information Request

Request No: 1

Company Name Kansas Power Pool  
Docket Number 17-KPPE-092-COM  
Request Date August 2, 2017  
Objection Date August 7, 2017  
Date Information Needed August 16, 2017

**Please Provide the Following:**

Please provide all Information, as defined by the Discovery Order, by and among GridLiance GP, LLC, South Central MCN LLC or any related affiliates with KPP and the City of Kingman since January 1, 2015 related to the Ninnescah line, the SemCrude substation interconnection and the 34.5 sub-transmission services provided through the Mid-Kansas OATT. Please provide this Information on an ongoing basis throughout these proceedings.

**Response:**

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a(a) & September 27, 2016 Discovery Order entered in this docket, ¶ 17. Kansas Power Pool further objects to this request because it is overly broad, vague and does not identify with reasonable particularity the information or documents sought. *See* September 27, 2016 Discovery Order entered in this docket, ¶ 17. Kansas Power Pool further objects to this request because it is burdensome. Without waiving these objections, Kansas Power Pool will otherwise respond to this Request.

Submitted By Mark D. Calcara  
Submitted To Amy F. Cline, Timothy E. McKee

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

**Mid-Kansas Electric Company, LLC**  
Information Request

Request No: 2

Company Name                      Kansas Power Pool  
Docket Number                    17-KPPE-092-COM  
Request Date                      August 2, 2017  
Objection Date                    August 7, 2017  
Date Information Needed August 16, 2017

**Please Provide the Following:**

Please identify all employees or representatives of GridLiance GP, LLC, South Central MCN LLC or any related affiliates with whom you have discussed the matters of this complaint or the services rendered under the Mid-Kansas OATT by Southern Pioneer.

**Response:**

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a(a) & September 27, 2016 Discovery Order entered in this docket, ¶ 17. Kansas Power Pool further objects to this request because it is overly broad, vague and does not identify with reasonable particularity the information or documents sought. *See* September 27, 2016 Discovery Order entered in this docket, ¶ 17. Kansas Power Pool further objects to this request because it is burdensome. Without waiving these objections, Kansas Power Pool will otherwise respond to this Request.

Submitted By                      Mark D. Calcara  
Submitted To                      Amy F. Cline, Timothy E. McKee

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

### Verification of Responses

I have read the foregoing Information Requests and objections thereto and find objections 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 Mid-Kansas Electric Company, LLC any matter subsequently discovered which affects the accuracy or completeness of the objections to these Information Requests.

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

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

  
8/7/17