

**BEFORE THE KANSAS CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the Application of Kansas Power Pool for a )  
Certificate of Convenience and Authority to Transact the )  
Business of an Electric Public Utility in the State of Kansas )  
for Transmission Rights Only in Cross Service Territory of ) Docket No. 18-KPPE-343-COC  
Southern Pioneer Electric Company and Ninnescah Rural )  
Electric Company. )

**CROSS-ANSWERING TESTIMONY OF**

**DR. ALA TAMIMI  
VICE PRESIDENT, TRANSMISSION PLANNING AND POLICY  
SUNFLOWER ELECTRIC POWER CORPORATION**

**ON BEHALF OF MID-KANSAS ELECTRIC COMPANY, INC.**

**July 16, 2018**

1   **Q:     Please state your name.**

2   A.     My name is Dr. Ala Tamimi.

3   **Q.     Are you the same Dr. Ala Tamimi who filed Direct Testimony in this docket?**

4   A.     Yes.

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

6   A.     The purpose of my testimony is to respond to testimony of Commission Staff  
7           witness Leo M. Haynos, and in particular, the impact of Staff's position on the  
8           application of the six factors listed in the Retail Electric Suppliers Act ("RESA")<sup>1</sup>,  
9           specifically from a transmission planner's perspective.

10  **Q.     Does local planning take the six factors considered by Staff into account when**  
11  **determining the least cost solution?**

12  A.     Yes. As I testified in my direct testimony, for local planning purposes, local  
13           planning takes the same six factors into account which Staff considered. However,  
14           Staff arrives at conclusions which are totally contrary to a planner's perspective of  
15           the application of the six factors. An effective planning process is a well-  
16           coordinated, cost effective process aimed at providing sufficient and efficient  
17           service to the public in general. This is aligned with the six factors Mr. Haynos  
18           references in his testimony, yet his analysis arrives at a conclusion totally different  
19           than an appropriate planning analysis would reach. Mr. Haynos gave no  
20           consideration at all to the conclusions reached in the local planning process and the  
21           importance of following the planning process in the issuance of a transmission  
22           rights only ("TRO") certificate of convenience and necessity to ensure only projects

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<sup>1</sup> K.S.A. 66-1,171.

1           that are in the public interest are certificated. When considering that a planner  
2           evaluates the same six factors for purposes of planning transmission, it only makes  
3           obvious sense that, in issuing a TRO certificate, a primary consideration would be  
4           the outcome of the transmission planning process related to the proposed project.

5   **Q.    To what do you attribute the difference in Mr. Haynos' approach and your**  
6   **approach as a transmission planner?**

7   A.   Mr. Haynos simply reduces the question to an analysis of the benefits to KPP  
8       without consideration of the costs to the greater public should the Kingman Direct  
9       Connection be built. Staff's analysis is devoid of the impact on the public in  
10      general. Such a limited analysis is contrary to least cost planning and will set a  
11      precedent that results in higher costs to the public, including KPP members, as other  
12      utilities elect to do the same. In summary, if Staff considered generally accepted  
13      planning principals as followed by Sunflower/Mid-Kansas, Staff would have  
14      reached the same conclusion as we did. The best solution is to connect Kingman  
15      load from the existing SemCrude 115/34.5 kV Substation to enable full load service  
16      to Kingman over the next 10-year planning horizon without any import or export  
17      limitations. A separate connection on the 115 kV line as proposed by KPP costs a  
18      lot more than upgrading the existing substation at SemCrude. From a reliability  
19      prospective and future load serving capability for Kingman, both options are very  
20      much identical. But with the SemCrude Substation Upgrade being less expensive  
21      and electrically equivalent to the Kingman Direct Connection, it is not in the public  
22      interest to build the Kingman Direct Connection.

1 **Q: How does Staff's position impact the local planning process and is local**  
2 **planning a legitimate factor to consider in the issuance of a TRO certificate?**

3 A. For a TRO certificate, the local planning process should be a critical factor taken  
4 into consideration in reaching the final determination. You cannot decouple the  
5 local planning process from the question of approving a certificate of public  
6 convenience and necessity for a proposed transmission project. By failing to  
7 consider the local planning process, the public will lose the benefit of a well and  
8 holistically planned buildout of the transmission and sub-transmission system at the  
9 least and most efficient cost. Overlooking the results of the local planning process  
10 will unavoidably result in duplication of facilities and service, wasteful use of  
11 materials and resources, and unnecessary encumbrances on the land, all of which  
12 leads to higher transmission costs for the public in general. To achieve the  
13 provisioning of sufficient and efficient service to the public, ignoring the important  
14 and critical role of the local planning process when evaluating a TRO certificate  
15 application is counter intuitive and will inevitably result in higher costs and less  
16 efficient service to the public.

17 **Q: Reviewing Mr. Haynos evaluation of the six factors, lets first begin with the**  
18 **orderly development of retail service.<sup>2</sup> Mr. Haynos concludes the Kingman**  
19 **Direct Connection transmission facilities will allow Kingman to expand its own**  
20 **distribution facilities to accommodate load growth. Do you concur?**

21 A: It may, but so will the less costly SemCrude Substation Upgrade. The Kingman  
22 Direct Connection is electrically and reliably equivalent to an alternative project

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<sup>2</sup> K.S.A. 66-1,171(a).

1           that is less costly (SemCrude Substation Upgrade). To the extent the Kingman  
2           Direct Connection expands load growth opportunity, so does the SemCrude  
3           Substation Upgrade. Both options will result in the same reliability and load serving  
4           capability. From a public interest perspective, KPP is opting for a more costly  
5           solution when it has a solution available to it that is less costly to the public. But  
6           more importantly, Staff's position does not facilitate the "orderly" development of  
7           electric service. Staff's recommendation encourages transmission development in  
8           a chaotic manner and outside of an organized planning process, which will result  
9           in duplicated facilities and an inefficient and ineffective patch work of redundant  
10          lines and facilities. Staff's position fails critically by not considering the  
11          consequences of allowing utilities to build transmission on a helter skelter basis.

12                 Staff further missed the mark by concluding the Kingman Direct  
13          Connection will elevate Kingman's ability to import and export power. Mr. Linville  
14          addresses the problem in Staff's reasoning by pointing out there presently is no  
15          export limitation, and import of less expensive energy is of little value when 95 %  
16          of Kingman's power supply is already being supplied by the market. Furthermore,  
17          even if you accept Staff's position regarding Kingman's alleged export and import  
18          capabilities, there is a less expensive alternative available to the public in the  
19          SemCrude Substation. The SemCrude Substation Upgrade will accomplish the  
20          same result for less costs to the ratepaying public overall.

21      **Q:     Mr. Haynos also concludes that the Kingman Direct Connection will avoid**  
22      **wasteful duplication of facilities.<sup>3</sup> Do you agree?**

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<sup>3</sup> K.S.A. 66-1,171(b).

1 A: No. Mr. Haynos concludes that the benefits of the Kingman Direct Connection *to*  
2 *KPP and Kingman* outweigh the cost of the project *to KPP and Kingman*, and  
3 therefore, the Kingman Direct Connection is not wasteful. Mr. Rooney has shown  
4 that the costs *to the public* are greater than the benefits. This is a waste of resources.

5 Mr. Haynos then says neither the KPP nor the Southern Pioneer project  
6 exists, so you do not have a “wasteful” duplication of facilities if KPP builds the  
7 Kingman Direct Connection. But the SemCrude facilities *do* exist. The facilities are  
8 on the ground and functioning, and essentially all that is required to meet KPP’s  
9 alleged need is to upgrade the transformer, which is merely one component within  
10 the existing footprint of the SemCrude Substation. Mr. Sonju addresses the  
11 duplication of equipment and facilities in his direct testimony, showing clearly that  
12 substantially all of the SemCrude Substation equipment and facilities will be  
13 duplicated by the Kingman Direct Connection. Furthermore, the SemCrude  
14 Substation will provide the same capacity as the Kingman Direct Connection.  
15 Again, there is an alternative available that is less expensive to the general public  
16 than the Kingman Direct Connection, assuming the proper public interest standard,  
17 and assuming the local planning process guides the analysis.

18 **Q: Mr. Haynos concludes the Kingman Direct Connection will not unnecessarily**  
19 **encumber the landscape of the state.<sup>4</sup> Do you concur?**

20 A: No. Mr. Beecher and Mr. Magnison addressed this in their direct testimony and I  
21 concur with their testimony. There is already an existing site (the Semcrude  
22 Substation site) which can be easily upgraded, with no additional encumbrance of

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<sup>4</sup> K.S.A. 66-1,171(c).

1 the landscape, at much less cost to the public. This again is consistent with the least  
2 cost analysis performed by the local planning process.

3 **Q: Does the Kingman Direct Connection prevent waste of materials and natural**  
4 **resource as concluded by Mr. Haynos?<sup>5</sup>**

5 A: No. Once again Mr. Haynos' conclusion is premised on faulty facts. He concludes  
6 that there is an export and import limitation when that is not factual. I refer the  
7 Commission to the direct testimony of Mr. Linville. There is no export limitation  
8 from a marketing perspective, nor is there a physical barrier from an engineering  
9 perspective. The import limitation is caused, in part, by Kingman's own facilities  
10 and it is not clear from the Olssen letter<sup>6</sup> whether Kingman plans on removing that  
11 impediment. Further, as I said above, the value of removing the import limitation  
12 is questionable since 95% of Kingman's power supply is already met by the market.

13 **Q. Will the local planning process always result in the use of existing 34.5 kV**  
14 **facilities.**

15 A. No, and that is not the purpose of the planning process. Only when the local  
16 planning process determines use of the 34.5 kV facilities is the least cost option will  
17 it be selected. In this situation, upgrading the SemCrude Substation happens to be  
18 the least cost option to facilitate the request by KPP. It is not the intention of our  
19 planning process to always arrive at a 34.5 kV solution. KPP and others will be free  
20 to pursue non-34.5 kV solutions when the non-34.5 kV solution is the least cost  
21 option as determined through the local planning process. However, in this instance,

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<sup>5</sup> K.S.A. 66-1,171(d).

<sup>6</sup> Exhibit LWH-3, Appendix B.

1 the Kingman Direct Connection is not the least cost option; connecting to an  
2 upgraded SemCrude Substation is.

3 **Q. Based upon your answer, it does not appear you are advocating that KPP**  
4 **remain connected in all instances to the Southern Pioneer or other Members'**  
5 **34.5 kV systems. Should KPP and other wholesale users be bound to use the**  
6 **34.5 kV network?**

7 A. No, but they should be bound by the local planning process. Although there are  
8 sound reasons for compelling the use of the 34.5 kV system, my point is that  
9 whether you agree or not with the proposition that KPP should remain connected  
10 to the 34.5 kV system, there should be no dispute that KPP should be bound by the  
11 outcomes of the planning process. The system users, including KPP, came to the  
12 realization a centralized planning process was necessary, agreed upon the "rules"  
13 of the process, and all proceeded on the understanding the outcomes would be  
14 accepted. The Members and wholesale customers should be able to rely upon the  
15 planning process to facilitate the efficient and effective build out of transmission  
16 and subtransmission facilities. KPP chose to plan outside the planning process and  
17 its unilateral decision is harming other stakeholders, like KEPCo and our members,  
18 who have been committed to and are relying upon the local planning process.

19 **Q. Are there exceptions to an adherence to the local planning process?**

20 A. I suppose there could be. If a utility elects to build a project that is not the selected  
21 option and their selected project causes no harm to the efficient operation of the  
22 transmission and subtransmission system or harm to the public interest, then that  
23 could be an exception. For example, if a utility elected to build a project contrary

1 to the results of the planning process and was willing to stand all the costs, with no  
2 financial burden on other ratepayers during the planning horizon (10-years planning  
3 horizon for Sunflower/Mid-Kansas and SPP planning), then the project might fall  
4 within an exception. But the Kingman Direct Connection is not that exception. It  
5 does do harm to others, as it is a more costly solution, the costs of which will be  
6 socialized among non-KPP customers receiving no benefit of the project.

7 **Q: Have the planning processes at SPP and the local level been sufficient to**  
8 **provide reliable service to the City of Kingman?**

9 A: Yes. Since 2005, the City of Kingman has had reliable service for its 6 MW load.  
10 With 6 MW service to Kingman, Sunflower's planning studies indicate adequate  
11 service for Kingman load over the current 10-year local planning horizon. If the  
12 service to Kingman continues at 6 MW, then the local planning process does not  
13 indicate any reliability issue that needs to be addressed. It is Kingman's decision  
14 not to operate their local generation, coupled with Southern Pioneer's obligation to  
15 serve all of Kingman's load, that has triggered a reliability issue because of voltage  
16 and thermal limitations on SPEC's 34.5 kV system. In 2010, Kingman spent  
17 approximately \$900,000 on improvements to their generation which extended their  
18 useful life to beyond our 10-year planning horizon. With that said and according to  
19 Kingman's latest load forecast, they have plenty of generation to cover their  
20 reliability needs from their own generation units even if they don't receive any  
21 service from SPEC. It is their decision not to run these generation units and to solely  
22 rely on electric transmission to serve all their load that drives the present reliability  
23 problem about which KPP complains. In other words, its the economics of running

1 generation vs receiving a transmission grid service that results in a reliability issue  
2 in the planning horizon.

3 **Q: Finally, Mr. Haynos concludes that the Direct Connection is in the public**  
4 **interest.<sup>7</sup> Do you concur?**

5 A: Absolutely not, and if the Commission issues an order accepting the position of  
6 Staff and KPP, the greatest harm will be to the retail customers and wholesale  
7 customers of Kansas. By completely overlooking the planning process in the  
8 determination of what transmission project is in the public interest, centralized  
9 planning will become a meaningless exercise. Utilities, such as KPP, will bypass  
10 the planning process and build any facility that, in their opinion, best serves their  
11 economic self-interest, or their affiliate transmission company self-interest, without  
12 consideration of the impact on transmission rates and service to the general public,  
13 the effect on the reliability of the transmission system, or whether there is a more  
14 beneficial project better serving the general interest. In the long run this State will  
15 pay dearly for a Commission policy that disregards the centralized process of local  
16 planning. More utilities will choose to, or be forced to, follow suit and build  
17 facilities simply on the basis of achieving customer-specific “savings” by shifting  
18 their costs to others.

19 **Q: Does this conclude your testimony?**

20 A: Yes.

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<sup>7</sup> K.S.A. 66-1,171(e).

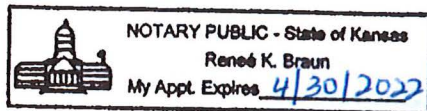
**VERIFICATION**

STATE OF KANSAS       )  
                                  ) ss:  
COUNTY OF ELLIS     )

DR. ALA TAMIMI, being first duly sworn, deposes and says that he is the DR. ALA TAMIMI referred to in the foregoing document entitled "CROSS-ANSWERING TESTIMONY" before the State Corporation Commission of the State of Kansas and that the statements therein were prepared by him or under his direction and are true and correct to the best of his information, knowledge and belief.

  
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Dr. Ala Tamimi

**SUBSCRIBED AND SWORN** to before me this 16<sup>th</sup> day of July, 2018.



  
\_\_\_\_\_  
Notary Public

My Appointment Expires: