

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

In the Matter of the Investigation into the)
Principles and Priorities to be Established for)
Evaluating the Reasonableness of the Location)
of a Proposed Transmission Line in Future) Docket No. 24-GIME-102-GIE
Line Siting Proceedings.)

**POST WORKSHOP REPLY COMMENTS OF SUNFLOWER ELECTRIC POWER
CORPORATION IN RESPONSE TO STAFF’S REPORT AND RECOMMENDATION**

COMES NOW Sunflower Electric Power Corporation (“Sunflower”) and submits its post workshop comments in this proceeding in response to the Staff of the Kansas Corporation Commission (“Commission”) of the State of Kansas (“Staff”) Report and Recommendation (“R&R”). In support of their response, Sunflower states:

1. Sunflower appreciates all of the other intervenors’ participation thus far in this docket and looks forward to continued collaboration and input to assist Staff in creating the proposed criteria list. Sunflower has reviewed and analyzed the proposed Criteria List and recommendations by Staff, other intervenor’s comments, and discussion topics raised in the technical workshop, and offers the following comments for Staff and the Commission.

2. Sunflower appreciates Staff’s and the Commission’s endeavor to create standard siting criteria. From a policy perspective, Sunflower consistently hears from regulators, regional transmission organizations, developers, and new loads that they desire transmission infrastructure to be constructed faster and at a lower cost. However, Sunflower is certainly sensitive to landowner issues. Most of the land traversed by Sunflower’s transmission lines is owned by members of Sunflower’s distribution cooperative member-owners, who are the ultimate ratepayers and owners of Sunflower. Many members of the Kansas Livestock

Association (“KLA”), the Kansas Farm Bureau (“KFB”), and the Kansas Independent Oil and Gas Association (“KIOGA”) are likely members of Sunflower’s distribution cooperative owners. The distribution cooperative owners of Sunflower were created to serve them electricity, and Sunflower was created to serve those distribution cooperatives.

3. The affordability of rates is always a significant focus for Sunflower. All utility investment and infrastructure construction requires a delicate balance between reliability and affordability. Attracting and retaining load requires a similar balance. Siting transmission lines and adequately addressing landowner concerns is no different. Sunflower is supportive of reasonable and fair approaches to siting, and believes the same is necessary. Siting criteria and requirements must make the same delicate balance to help utilities meet current desires for lower cost and faster construction timelines for transmission infrastructure and the need for fair and reasonable treatment of landowner siting issues.

4. Generally, completing that balancing act takes measured and careful analysis. Sunflower has some concern that this proceeding is moving forward in an accelerated timeline given recent proposals. This proceeding was opened for a general investigation on August 3, 2023. Staff filed its first Report and Recommendation on December 1, 2023 outlining two broad scopes of focus:

1. Provide insight into the appropriate role of state jurisdictional authorities in the SPP process to develop parameters for consideration in a SPP Request for Proposal (RFP) for a competitively bid transmission construction project (FERC 1000 Project).

2. Establish guidelines of land use parameters and construction practices that should be considered in determining the reasonableness of the route in rural areas of an electric transmission line.

5. Taking into consideration the multitude of comments filed by various parties in this proceeding, Staff's second Report and Recommendation was filed on March 15, 2024, and recommended eliminating the first aforementioned issue from this proceeding, and instead focus on the second. Staff's second Report and Recommendation went on to recommend various criteria/factors and request that stakeholders propose additional criteria and modifications to the list.¹ Staff ultimately recommended the following:

1. A formal routing study that proposes siting criteria and criteria prioritization be required as part of the application in all future line siting dockets.
2. The utility may add criteria with Commission approval if additional parameters are warranted due to site specific conditions.
3. The utility may also request modifications to line siting criteria and their weights subject to Commission approval.
4. With the goal of this General Investigation being the improvement of the line siting process, Staff recommends interested parties propose additional line siting criteria and prioritization factors to be considered by the Commission as part of this proceeding. Staff's recommended list of standard line siting criteria are listed below.

- Residential Proximity (each residence within 300 feet).
- Cultivated Crop Impact (acres in right of way). • Reliability (ability to maintain after construction).
- Length along Transmission Mains (miles).
- Length not along Parcel Boundaries (miles).

¹ Notice of Staff's Filing of Report and Recommendation, Recommendation, p. 3-4 (filed March 15, 2024).

- Public Facilities within 300 feet (each).
- Length Not along Roads (miles).
- Sensitive Species Impacts (unit-less).
- Woodland impacts (acres).
- Visibility (e.g. impact on curbside appeal).
- Cultural Site within 1,320 feet (each).
- Center Pivot Irrigation Impacts (each).
- Wetland/River Environmental Impacts (acres in right of way).
- Total Length (miles).
- River Crossings Engineering Impact (each).
- Area not in Grassland/Pasture (acres in right of way).
- Deflections over 30 degrees (each).
- Road Crossings (state/interstate highways, each).
- Transmission Line Crossings (each).

6. Neither Staff's first Report and Recommendation nor its second Report and Recommendation recommended landowner protocols, agricultural impact protocols, or oil and gas protocols. On July 30, 2024, the Commission approved Staff's recommended scope from its second Report and Recommendation. The parties filed Initial Comments on September 20, 2024, and Reply Comments on October 4, 2024. Staff filed its third Report and Recommendation based on those comments on October 4, 2024, ultimately recommending the following items be incorporated in the scope of this docket:

- Establishment of Routing Principles.

- Establishment of Standard Criteria that directly impacts landowners and their corresponding Weights.
- Definition of Standard Criteria.
- Allowance of utilities to add criteria without Commission approval. New criteria must be established based on Routing Principles. Additional criteria may be considered unreasonable if they do not adhere to Routing Principles.
- Establishment of residential setbacks.
- Establishment of a definition of Rural.

7. Pursuant to the procedural schedule in this proceeding, the parties held a Technical Workshop on November 1, 2024. The night of October 31st, Staff delivered to all parties the 3 recommendations included in their eventual Notice of Filing of Staff's Proposal and Motion for Modification of the Procedural Schedule that was filed in this docket on November 4, 2024. Staff recommended for the first time in this proceeding that each utility submitting a line siting application submit with the application the following protocols or have a previously approved protocol on file with the Commission: 1. Agricultural Impact Mitigation Protocols. 2. Landowner Protocols. 3 Oil and Gas Industry Protocols. However, the proposal provides no detail or specificity as to what each should address, and the Technical Workshop yielded little more detail or specificity.

8. Sunflower is not opposed to discussion around the aforementioned protocols and what should potentially be included, but does believe that more time is needed to understand not only the detail of what Staff has proposed, but what each stakeholder believes the detail to be. However, with the remaining procedural schedule, there is not much opportunity for discussion or information to be admitted into the record in this proceeding with regard to those issues before

a Commission order. Nevertheless, Sunflower will address the three recommendations from Staff and the issues raised in this docket by Staff and intervenors.

I. Routing Principles and Definitions

9. Sunflower concurs with Staff that specifying certain routing principles are useful and advantageous when comparing alternative routes for transmission line siting. Sunflower believes that having rigid routing principles causes potential issues, as the principles would be in constant conflict with one another. Therefore, Sunflower advocates that the routing principles be viewed as guidelines to be used in developing transmission line routes in a totality of circumstances approach. As stated in Sunflower's prior comments, there is evident confusion and disagreement regarding some of the criteria definitions. Further clarity on definitions for applicable criteria is needed.

10. Sunflower agrees with other utilities involved in this docket and also recommends that the avoidance of communication towers and wind turbines be removed as a routing principle. Any issues or constraints that arise between the utility and owners of wind turbines and communication towers are to be addressed privately between the two parties. The National Electric Safety Code also governs the relationship between the two parties as well.

II. Criteria List

11. Sunflower appreciates Staff's reception to comments and suggestions in creating the criteria list, as well as the other intervenors' involvement and respective positions regarding the weighting and priority of certain criteria. However, Sunflower continues to advocate that flexibility in implementing said factors and criteria are imperative to developing routing studies. As echoed by other intervenors in this docket, having a rigid criteria list will create unintended consequences and adverse impacts to landowners and utilities alike.

12. Sunflower hesitantly affirms its prior stated “top 5” criteria as stated in their initial post workshop comments in recognition of Staff’s strong desire to implement some form of a weighted criteria list. Sunflower still believes that the criteria list should be used more appropriately as a list of non-exhaustive factors that must be considered in the totality of the circumstances for siting applications and weighed against each other in specific siting activities.

III. Protocols

13. Sunflower is not directly opposed to the creation and implementation of a form of protocols regarding landowners, agricultural mitigation, or oil and gas interests. However, Sunflower would like to repeat that current processes and interactions with landowners performed by Sunflower during the course of easement acquisition are highly effective, and generally result in signage rates near 85-95% in transmission line projects. Additionally, Sunflower prides itself and continuously strives to work with any landowners that have major issues regarding the construction and operation of a transmission line on their property, and the current processes used accomplish successful easement acquisition. To date, Sunflower has been able to successfully acquire transmission line easement without the need for a formalized and published set of protocols. In addition, Sunflower believes its success rate is evidence of fair and transparent dealings. As referenced above, there does not appear to be a consensus understanding of the detail of Staff’s proposed protocols. As ITC Great Plains, LLC points out, some of the issues being raised with regards to protocol content are not necessarily jurisdictional to the Commission, and more properly seated with the district courts.² Sunflower is also concerned that without flexibility in the protocols, the Commission may hinder and/or dictate freedom of contract not only for utilities, but for landowners as well. Every piece of real estate is

² ITC Great Plains, LLC’s Initial Post-Workshop Comments, Docket No. 24-GIME-GIE, at ¶16 (filed November 8, 2024).

unique, and so is every landowner. Kansas law already includes a well-developed body of law for compensation and conflicting third-party real estate use issues.

a. Oil & Gas Protocols

14. Regarding Eastern Kansas Oil & Gas Association (“EKOGA”) KIOGA’s prior comments in this docket, Sunflower believes that establishing a notice system for mineral interest owners and an accompanying compensation scheme is well outside the scope of this docket. If the Commission desires to implement rules or regulations regarding notice to mineral interest owners and oil & gas operators, then this must be done through the Commission’s rulemaking process, not a general investigation. Additionally, the Commission does not have the authority to implement a compensation scheme for mineral interest owners and oil and gas operators as this issue is reserved to the district court system, and there is an existing body of law addressing these issues.

15. Sunflower reiterates that it is not encountering any major issues with mineral interest owners or oil & gas operators, even while there is a large presence of oil and gas development in Sunflower’s members’ respective territories. Sunflower currently works with oil & gas operators to site transmission lines accordingly with active operations, as well as taking into account notices of intent to drill where applicable.

16. As NextEra Energy Transmission Southwest, LLC (“NEET Southwest”) stated in prior comments, electric utilities already acquire any surface easement subject to the mineral interest owner’s surface use rights, whether acquisition was voluntary or via eminent domain.³ Because no interest is needed from the mineral interest holder, there is no notice issue under

³ NextEra Energy Transmission Southwest, LLC's Initial Post-Workshop Comments, Docket No. 24-GIME-102-GIE, at ¶27 (filed November 8, 2024).

K.S.A. 66-1,179 and 66-1,178(a)(2). Utilities are not seeking to acquire anything from mineral interest holders or those who have interests therein. Thus, no notice is required under the statute. Again, the issues EKIOGA and KIOGA raise are reserved for the district court.

17. In addition EKOGA and KIOGA have not provided any evidence in the record of actual issues they are experiencing. Without more information regarding said issues, or additional information on what is to be included in an oil & gas protocol, Sunflower will need more time to analyze appropriately.

b. Landowner and Agricultural Mitigation Protocols

18. Sunflower is concerned that much of the discussion regarding landowner and agricultural mitigation protocols in this docket is venturing into the areas of compensation and eminent domain. Again, Sunflower appreciates the concerns or issues raised in this docket regarding landowners, however, the Commission has no jurisdiction to set compensation values or amend existing eminent domain laws.

19. Sunflower believes that creating a set compensation amount requirement for easement acquisition is outside of the Commission's jurisdiction. Compensation amounts are private negotiations best handled by the utility and the landowner. Additionally, requiring utilities to pay above the market value of land for easement acquisition, for example, 150%, could actually create a perverse incentive for utilities. As dictated by the legislature, compensation via Kansas eminent domain is based on fair market value.⁴ Requiring utilities to pay more than fair market value for consensual easements could ultimately incentivize a utility to

⁴ K.S.A. 26-501 *et seq.*, and more specifically, K.S.A. 25-513, where section K.S.A. 25-513(e) states: "Fair market value' means the amount in terms of money that a well informed buyer is justified in paying and a well informed seller is justified in accepting for property in an open and competitive market, assuming that the parties are acting without undue compulsion. The fair market value shall be determined by use of the comparable sales, cost or capitalization of income appraisal methods or any combination of such methods."

pursue eminent domain, where compensation is driven by actual fair market value. That is a result that utilities and landowners are likely both interested in avoiding. As stated above, it is outside of the Commission's jurisdiction to create compensation requirements for utilities to pay landowners.

WHEREFORE, Sunflower submits these post workshop comments in response to Staff's Criteria List and other recommendations listed in its Second Report and Recommendation for Commission review and consideration and for such other relief as the Commission deems just and reasonable.

Respectfully submitted,


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VERIFICATION

James Brungardt, of lawful age, being first duly sworn on oath, states:

That he is the Manager, Regulatory and Government Affairs for Sunflower Electric Power Corporation; that he has read the above and foregoing Comments of Sunflower Electric Power Corporation and knows the contents thereof; and that the statements contained therein are true.



James Brungardt

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 22nd day of November 2024, the above and foregoing Post Workshop Comments of Sunflower Electric Power Corporation was submitted to the following parties via electronic mail:

/s/ Monica Seib _____

Monica Seib

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