

**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 the SPP and Kansas Electric Utilities that)
Participate in SPP is in the Public Interest.)

REPLY COMMENTS OF COMMISSION STAFF

COMES NOW Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively) and in compliance with the Commission's *Order Opening General Investigation* and *Order Granting Extension of Time to File Comments*, dated January 19, 2017, and February 28, 2017, respectively, files its Reply Comments. In support hereof, Staff states as follows:

I. Background

1. On January 19, 2017, the Commission issued its Order Opening General Investigation. In its Order, the Commission found an investigation should be opened "to determine whether annual or periodic reporting by SPP, and by Kansas utilities that participate in SPP, regarding the costs and benefits to Kansas utilities and ratepayers afforded by continued SPP membership is in the public interest."¹ To facilitate a thorough and thoughtful discussion, Commission sought comments on a number of specific questions suggested by Staff, "along with any other questions or information the parties deem relevant to the issue of the costs and benefits of continued participation in SPP."² The Commission established a comment schedule allowing initial comments followed by two rounds of reply comments.

¹ Order Opening General Investigation, January 19, 2017, ¶ 8.

² Order Opening General Investigation, ¶ 9.

2. Between April 17 and April 21, 2017, the following parties filed Initial Comments in compliance with the Commission's Order: Southwest Power Pool, Inc. (SPP), Midwest Energy, Inc. (Midwest Energy), Kansas City Power & Light Company (KCP&L), The Empire District Electric Company (Empire), Westar Energy, Inc. (Westar), Sunflower Electric Power Corporation (Sunflower), Mid-Kansas Electric Company, LLC (Mid-Kansas), Kansas Power Pool (KPP), Kansas Municipal Energy Agency (KMEA), ITC Great Plains, LLC (ITC-GP), and the Citizens' Utility Ratepayer Board (CURB).

3. In its comments, SPP offered responses to each of the questions posed by the Commission.³ In addition, SPP described a number of currently-available studies and reports related to the costs and benefits of participation in RTOs, generally, and SPP, specifically.⁴ SPP recommends the Commission find that existing data and information can satisfy the need for reporting regarding the costs and benefits of SPP membership.⁵ SPP also recommends the Commission consider requiring SPP to file reports currently produced by SPP as they are finalized and published in accordance with SPP's tariff. Based on these filings, the Commission can decide whether additional analysis or information is needed.⁶

4. Midwest Energy generally defers to and agrees with the comments of SPP. In particular, Midwest Energy "concur[s] with SPP's conclusion that a new study regarding the costs and benefits of continued participation is not necessary, and that existing information or the supplementation of existing information with Kansas-specific data is more than adequate to

³ Comments of Southwest Power Pool, Inc., April 21, 2017, Attachment 1. (SPP Comments, Attachment 1.)

⁴ SPP Comments, ¶¶ 5-7.

⁵ SPP Comments, ¶ 27.

⁶ SPP Comments, ¶¶ 28-29.

provide the answers to the questions the Commission is posing.”⁷ Midwest energy also offers responses to each of the questions posed by the Commission.⁸

5. KCP&L, Empire, and Westar jointly address the Commission’s questions and provide additional general comments. These utilities state that they “do not currently believe that the Commission should require its jurisdictional utilities to perform a cost/benefit evaluation of their continued participation in SPP. Given the study challenges, uncertainty, study costs, existing evaluations, and potential SPP exit fees, [an] additional study at this time is unnecessary.”⁹ These utilities also describe the existing SPP studies and note, “While improvements to the study process can and will be made, the Companies believe that these studies can reasonably form the basis for gauging the value of SPP participation.”¹⁰

6. Sunflower and Mid-Kansas’s comments respond to the Commission’s questions and generally discuss the value of SPP membership and participation. Sunflower and Mid-Kansas echo the comments of other parties about existing reports and studies, stating, “Examining the value of SPP to the membership is not something that SPP and its membership have overlooked.”¹¹ Sunflower and Mid-Kansas go on to describe specific concerns with SPP transmission planning and cost allocation processes.¹² In addition, Sunflower and Mid-Kansas note that Mid-Kansas has the highest retail rate impact of any utility in SPP.¹³ However, they caution:

None of these points raised are a reason to conclude the cost outweighs the value of SPP membership. The savings from reduced manpower, system-wide

⁷ Comments of Midwest Energy, Inc., April 17, 2017, ¶¶ 10, 14. (Midwest Energy Comments, ¶¶ 10, 14.)

⁸ Midwest Energy Comments, ¶¶ 11-13.

⁹ Initial Comments of Kansas City Power & Light Company, The Empire District Electric Company, and Westar Energy, Inc., April 21, 2017, ¶ 20. (Joint Comments of KCP&L, Empire, and Westar, ¶ 20.)

¹⁰ Joint Comments of KCP&L, Empire, and Westar, ¶ 24.

¹¹ Comments of Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC, April 21, 2017, ¶ 5. (Joint Comments of Sunflower and MKEC, ¶ 5.)

¹² Joint Comments of Sunflower and MKEC, ¶¶ 13-15.

¹³ Joint Comments of Sunflower and MKEC, ¶ 10.

transmission planning, economic dispatch and the spreading of the risk of significant load loss, all support the value of SPP without the necessity of new or additional reports or studies. More importantly these are all matters requiring attention and resolution by the membership. Certainly the Commission can play an important role in advancing the resolution of these matters.¹⁴

Finally, Sunflower and Mid-Kansas state, “Before launching [an additional] study, it would be prudent to ascertain the costs of the study in relation to the benefit of the report, especially in relation to the studies already conducted by SPP and its membership. As an alternative to an independent study, the KCC could perhaps recommend refinement to the current SPP studies....”¹⁵

7. ITC-GP’s comments address each of the questions posed by the Commission. In its responses, ITC-GP generally agrees with or defers to SPP’s initial comments. ITC-GP emphasizes that any study considering the value of SPP membership “should consider the comprehensive set of benefits and economies of scale generated by Kansas utilities being part of a Regional Transmission Organization (RTO).”¹⁶ ITC-GP also emphasizes the value of existing studies and reports, stating, “Prior to conducting an additional study at ratepayer expense, it would be prudent to assess whether a positive benefit-to-cost ratio for Kansas ratepayers could be determined from a review of data within existing reports....”¹⁷

8. KPP notes its support for SPP’s initial comments and addresses each of the Commission’s questions. In addition, KPP specifically describes how it and its members benefit from SPP. “Were it not for SPP NITS,¹⁸ or the NITS of a similar RTO, KPP’s operations would

¹⁴ Joint Comments of Sunflower and MKEC, ¶ 16.

¹⁵ Joint Comments of Sunflower and MKEC, p. 9.

¹⁶ Comments of ITC Great Plains, LLC, April 21, 2017, pp. 1-2. (ITC-GP Comments, pp. 1-2.)

¹⁷ ITC-GP Comments, p. 3.

¹⁸ “NITS” is an acronym for Network Integrated Transmission Service.

be more expensive and complex. This is due to the efficiency of SPP transmission service and the SPP integrated marketplace.”¹⁹

9. KMEA also voices support for SPP’s comments, “specifically with respect to information currently available to the Commission on costs and benefits of participation in SPP, and supports the position that an independent study isn’t likely needed to provide the Commission with sufficient information to be assured that participation in SPP is in the Kansas utilities’ and their ratepayers’ interest and in the public interest.”²⁰

10. CURB states that “the costs and benefits of SPP membership have a material effect upon Kansas residential and small commercial ratepayers. Therefore the issues presented in this general investigation are important to CURB’s constituents.”²¹ CURB notes that while system-wide benefits may be impressive, “they may not adequately address...state savings culminating from SPP services.”²² Therefore, “...SPP and Kansas member utilities should be able to substantiate Kansas membership benefits with clear and concise, quantifiable value reporting.”²³ CURB comments that any new study “should be designed...to capture clear and concise, quantifiable data regarding the net rate savings (if any) enjoyed by Kansas SPP members through SPP membership.”²⁴ However, CURB also states,

[T]he costs of the studies and reports required from SPP and/or Kansas utilities...should be commensurate with the benefits to be derived from such studies. Therefore, CURB urges the Commission to take advantage of all information that is available and usable (from the past studies conducted by SPP and Kansas utilities in regards to SPP membership and other data), and to require additional studies only to the extent that the available information fails to address the informational needs of the Commission....²⁵

¹⁹ Comments of Kansas Power Pool, April 21, 2017, p. 2.

²⁰ Comments of Kansas Municipal Energy Agency, April 21, 2017, ¶ 6.

²¹ Comments of Citizens’ Utility Ratepayer Board on Southwest Power Pool Membership, April 21, 2017, ¶ 11. (CURB Comments, ¶ 11.)

²² CURB Comments, ¶¶ 9-10.

²³ CURB Comments, ¶ 10.

²⁴ CURB Comments, ¶ 17.

²⁵ CURB Comments, ¶ 16.

CURB later notes that “the scope and continued accuracy of these [existing] studies (particularly regarding the allocation of SPP costs after IS²⁶ membership in SPP) may be a topic that is now ripe for discussion.”²⁷

II. Staff’s Reply

11. Staff appreciates the comments and additional information supplied by all parties. This process is very informative and will help Staff develop its opinion regarding the need for additional reporting on the costs and benefits of SPP membership. Staff continues to review the comments and various reports and information cited by the parties. Therefore, Staff will reserve any formal recommendations at this time. However, in its review of the parties’ initial comments, Staff has identified a number of additional questions or areas of clarification that should be addressed to more fully develop the record in this proceeding.

12. In particular, Staff requests the relevant parties provide the following information in the next round of reply comments:

- **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

²⁶ “IS” is an acronym for the Integrated System, which includes The Western Area Power Administration – Upper Great Plains, Basin Electric Power Cooperative, and Heartland Consumers Power District.

²⁷ CURB Comments, ¶ 23.

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.

- 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.

- 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.
- 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

²⁸ See Joint Comments of KCP&L, Empire, and Westar, ¶ 23.

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.”²⁹ 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.

- At Page 7 **Midwest Energy** provides a list of benefits and costs that it believes should be included in any study, if required. **Sunflower and Mid-Kansas** echo this list, and **SPP** also provides this list at page 5 of its comments. It would be helpful if **SPP and the utilities** commented specifically on which of these various benefits/costs have been captured/quantified/monetized in existing SPP studies to date. For example, RCAR II, RIA, the Value of Transmission, etc. Additionally, discussion of why these different costs/benefits have or have not been included in existing studies would be helpful for Staff’s analysis and the Commission’s deliberations.

²⁹ See also, SPP Comments at page 4: SPP notes its willingness to provide “more details specific to Kansas” and comments that it can “work with member companies to provide Kansas-specific information.”

- At page 12, **Midwest Energy** estimates its exit obligations at two million dollars for outstanding debt and \$70 million for Schedule 11 obligations, based on an estimate provided by SPP as of December 31, 2016. It would be beneficial for Staff and the Commission to have more detail behind these exit fee obligations. Are these one-time upfront payments, rate obligations over time, etc.? This information should be provided in reply comments. To the extent possible, Staff requests this more-detailed exit fee information from **SPP or the other utilities** for all the Kansas utilities.
- At page 2 of **Empire, KCP&L, and Westar's** comments, the utilities suggest various study parameters. However, certain of the parameters, such as a 20-year benefit cost projection, are not explained or justified. It would be helpful for Staff and the Commission to understand why the utilities believe that a 20-year benefit cost projection, for instance, would be more instructive than the 40-year timeframe used by the RCAR II study.
- Paragraph 18 of the **Empire, KCP&L, and Westar** comments suggests that non-SPP members do not have access to the SPP integrated marketplace. This is directly contrary to the comments of **SPP, Midwest, and Sunflower/Mid-Kansas**. The Electric IOUs should explain this apparent discrepancy. In addition, Staff requests **SPP and the utilities** provide a detailed comparison of all SPP integrated marketplace activities available to members vs. non-members. The comparison should identify the full range of SPP integrated marketplace activities lost when withdrawing membership.
- Paragraph 20 of **Empire, KCP&L, and Westar's** comments identifies estimated exit fees of \$810 million for Westar, \$755 million for KCP&L, and \$150 million for Empire District. However, as noted above for Midwest Energy, there are no specific details

given for how these amounts were estimated. For instance, would these fees be incurred as a one-time payment, payments over time, or through a different arrangement? Are there any other assumptions that can provide more detail to how these estimates were developed? Staff's review and the Commission's deliberations will be assisted if this information is provided in more detail.

- At Paragraph 21 **Empire, KCP&L, and Westar** comment about the uncertainties and difficulty of quantifying the Schedule 11 revenues that would accrue to Kansas utilities in the event of withdrawal. It is uncertain, then, whether the exit fees estimated in Paragraph 20 reflect the impact of these revenues as an offset to the fees. If the estimated fees do not reflect this estimated revenue, the utilities should explain why that is the case, and provide the best estimate possible of what these revenues would be to offset the exit fees.
- At Paragraph 23 of **Empire, KCP&L, and Westar's** comments, the companies state that KCP&L has worked with a consultant to estimate the cost of the study described in their comments. This study was estimated to cost approximately \$600,000. It would be helpful for Staff and the Commission to understand which consulting firm provided that estimate. Staff also requests the utilities include a copy of the budget estimate provided by the consultant for Staff and the Commission's review. If this information must be protected as confidential over concerns about competitive bidding, KCP&L may file the information confidentially in compliance with K.A.R. 82-1-221a and K.S.A. 66-1220a.
- At Paragraph 17 of **Empire, KCP&L, and Westar's** comments, the companies describe the overwhelming cost associated with forming a Kansas-only RTO. They note both the

expenses associated with exiting SPP and the “costs associated with setting up the new entity, which would only duplicate efforts already performed by the SPP.”

In addition to many other mandates, FERC Order 1000 requires every public utility transmission provider to “participate in a regional transmission planning process” and coordinate with neighboring transmission planning regions “to determine if there are more efficient or cost-effective solutions” than those identified regionally.³⁰ Furthermore, the regional planning process must include a regional cost allocation methodology for “the costs of new transmission facilities selected in a regional transmission plan....”³¹ Given these and other regional planning and cost allocation requirements imposed by the FERC, if the Kansas utilities exit SPP, what services currently provided by SPP would the utilities be legally required to replicate through a new regional transmission planning entity? Which services would be assumed by the utilities individually?

WHEREFORE Staff submits its *Reply Comments of Commission Staff* for consideration by the Commission and other parties to this proceeding.

³⁰ Order No. 1000, Transmission Planning & Cost Allocation by Transmission Owning & Operating Pub. Utilities, 136 F.E.R.C. ¶ 61051 at paras. 2, 8, (July 21, 2011). (Order No. 1000, ¶¶ 6, 8.); *See also*, <https://ferc.gov/industries/electric/indus-act/trans-plan.asp> (describing Order 1000 requirements, generally).

³¹ Order No. 1000, ¶ 9.

Respectfully submitted,

/s/ Andrew J. French

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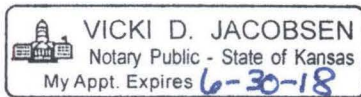
VERIFICATION

Andrew J. French, being duly sworn upon his oath deposes and states that he is Senior Litigation Counsel in the Office of Litigation Counsel of the Kansas Corporation Commission, that he has read and is familiar with the foregoing *Reply Comments of Commission Staff*, and the statements therein are true to the best of his knowledge, information and belief.



Andrew J. French, #24680
Senior Litigation Counsel
State Corporation Commission of the State
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Subscribed and sworn to before me this 22nd day of May 22, 2017.



Vicki D. Jacobsen
Notary Public

My Appointment Expires: 6-30-18

CERTIFICATE OF SERVICE

17-SPPE-117-GIE

I, the undersigned, certify that a true and correct copy of the above and foregoing Staff's Reply Comments was served via electronic service this 22nd day of May, 2017, to the following:

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