

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

Before Commissioners:

Pat Apple, Chairman
Shari Feist Albrecht
Jay Scott Emler

In the Matter of a General Investigation for)
the Purpose of Investigating Whether Annual)
or Periodic Cost/Benefit Reporting by SPP) Docket No. 17-SPPE-117-GIE
and Kansas Electric Utilities that Participate)
in SPP is in the Public Interest.)

REPLY COMMENTS OF SOUTHWEST POWER POOL, INC.

COMES NOW, Southwest Power Pool, Inc. (“SPP”), by and through its counsel, and hereby submits its reply comments in response to the Reply Comments of Commission Staff filed on May 22, 2017.¹

I. BENEFITS/COST OF EXISTING SPP STUDIES

1. In the Staff Reply Comments, Commission Staff asked several questions pertaining to existing SPP studies such to ascertain which of the various benefits/costs have been captured/quantified/monetized and to include specific additional data that can be supplemented with Kansas specific data that might help determine that Kansas customers are benefiting today from Kansas utility membership in SPP.² To assist the Commission, SPP provides additional information concerning the Regional Cost Allocation Review (“RCAR”) analysis. The RCAR analysis is required by Attachment J of the SPP Open Access Transmission Tariff (“SPP Tariff”).³ The requirement is to “review the reasonableness of the regional allocation methodology and factors (X% and Y%) and the zonal allocation methodology at least once every

¹ Docket No. 17-SPPE-117-GIE, *Reply Comments of Commission Staff* (May 22, 2017) (“Staff Reply Comments”).

² Staff Reply Comments at paragraph 12.

³ See Southwest Power Pool, Inc., Open Access Transmission Tariff, Sixth Revised Volume No. 1 at Attachment J, Section III.D.

three years...”and that “[a]ny change in the regional allocation methodology and factors or the zonal allocation methodology shall be filed with the Commission.”⁴

2. The RCAR analysis is completed under the guidance of the Regional Allocation Review Task Force (“RARTF”) which is comprised of SPP Members, Regional State Committee (“RSC”) members and a member of the SPP Board of Directors. The RARTF was formed in 2010 and created the RARTF Report in January 2011 that is the basis of the RCAR analysis SPP has used to date. The State Corporation Commission of the State of Kansas (“KCC”) has had commissioner representation on the RARTF since its inception.

3. The RCAR analysis is a 40 year study of the benefits and costs of the transmission system built under SPP’s Highway/Byway cost allocation methodology.⁵ The RCAR analysis looks at the adjusted production cost (“APC”) savings that have been afforded the majority of the zones by the build out of the transmission system since approval of the Highway/Byway cost allocation methodology as well as other benefits. To accomplish this, a technical analysis is performed to calculate the APC in a 5, 10 and 20 year future cases and compare those to the system with the base-case having the 2010 topology. The economic differences in these cases are the basis of the APC savings for each zone. Additional benefits are calculated as described in the RCAR II Report.⁶ All of these combined benefits are then offset by the current costs for these projects to determine a zonal benefit-to-cost ratio. The first two RCAR studies were completed in an entirely prospective approach utilizing stakeholder developed models and assumptions.

4. In developing RCAR II, the RARTF was aware that a situation existed in the model where the wind generation built in the Sunflower Electric Power Corporation (“Sunflower”) and Mid-Kansas Electric Company, LLC (“Mid-Kansas”) areas would show to be

⁴ *Id.* at Section III.D.1.

⁵ The current regional cost allocation methodology is termed Highway/Byway and was approved by the Federal Energy Regulatory Commission (“FERC”) in June 2010. *See Sw. Power Pool, Inc.*, 131 FERC ¶ 61,252 (2010), *reh’g denied*, 137 FERC ¶ 61,075 (2011). Both RCAR studies that have been completed to date only reviewed those projects that were approved under the Highway/Byway methodology starting in June 2010.

⁶ The benefits approved to be calculated for RCAR are: Adjusted Production Cost Savings, Avoided or Delayed Reliability Projects, Capacity Savings from Reduced On-peak Losses, Mitigation of Transmission Outage Costs, Assumed Benefits of Mandated Reliability Projects, Benefit of Meeting Public Policy Goals, Increased Wheeling Through and Out Revenues, Marginal Energy Losses Benefits, Reduced Cost of Extreme Events, Reduced Loss of Load Probability, Capital Savings from reduced Minimum Required Margin. *See Regional Cost Allocation Review (RCAR II) Report*, dated July 11, 2016, at Section 7 posted on SPP’s website at: <https://www.spp.org/documents/46235/rcar%20%20report%20final.pdf>.

“trapped” due to the lack of transmission in the base case used in that analysis. This situation was a known limitation prior to the start of RCAR II and the solution was vetted and voted on twice by the Economic Studies Working Group, which is the technical SPP stakeholder group that owns the models used in the economic analysis of the transmission system. These modeling limitations are one of the reasons that both SPP and the RARTF have undertaken an initiative to redefine the methodology for future RCAR studies.

5. The RARTF has also recently completed a Rate Impact Analysis (“RIA”) in December 2016.⁷ A RIA was contemplated by the RSC in 2010 when the Highway/Byway cost allocation methodology was being approved. The thought of the RSC at that time was to be able to look at the cost impacts of the transmission build out on average retail customers (individuals, commercial and industrial). The RIA looks at a single year where the transmission costs are the highest for the entire SPP footprint. The latest study utilized the recently completed RCAR II models and benefits information to complete this analysis.

II. TRANSPARENCY IN THE POTENTIAL STUDY

6. In the Staff Reply Comments, Commission Staff asks whether a potential study could address the Citizens’ Utility Ratepayer Board’s desire for a straightforward, transparent calculation of the retail ratepayer cost/benefit associated with SPP participation.⁸ SPP agrees that reports provided to the KCC in response to this docket, whether they result from existing studies or a new study, should provide information about the benefits and costs of SPP services and membership so that comparisons can be made in assessing the net benefit of such participation for SPP’s transmission pricing zones that serve ratepayers in Kansas. From this information, cost-benefit ratios and other metrics can be calculated.

7. Some of costs and benefits are more conducive to quantification than others. It is appropriate to assess a full range of factors and quantify as many of them as practicable. The underlying assumptions and the methodologies applied in such studies can be made available for review in order to facilitate verification of the results. Although the methodologies used in assessing some of the costs and benefits are complex due to the nature of the metrics, documentation can be provided in these cases to achieve the necessary degree of transparency.

⁷ The RIA was presented to the RSC on January 30, 2017. See RSC Minutes, dated January 30, 2017, at pages 4, 115-154 posted on SPP’s website at: <https://www.spp.org/documents/48631/rsc%20minutes%2020170130.pdf>.

⁸ Staff Reply Comments at paragraph 12.

III. SPP INTEGRATED MARKETPLACE CLARIFICATION

8. In the Staff Reply Comments, Commission Staff asks for clarification on non-SPP members not having access to the SPP Integrated Marketplace and for a detailed comparison of all SPP Integrated Marketplace activities available to SPP Members vs. non-members.⁹ The statement in the Initial Comments of Kansas City Power & Light Company, The Empire District Electric Company, and Westar Energy, Inc. (together, the “Electric IOUs”), that entities “do not have access to the SPP market unless they are members of SPP,”¹⁰ should not be interpreted as referring to the defined and capitalized term “SPP Member.” This specific term refers to a signatory to the SPP Membership Agreement and should be distinguished from a participant in the SPP Integrated Marketplace, which is described in the SPP Tariff. While the group of companies that are SPP Members under the SPP Membership Agreement and the group of companies that participate in the SPP Integrated Marketplace do overlap to a substantial degree, there are SPP Members that do not participate in the SPP Integrated Marketplace and there are companies that participate in the SPP Integrated Marketplace and are not SPP Members.

9. The key point underlying the Electric IOUs’ Initial Comments is that a distinction should be made between companies with registered load and/or power resources in the market and those without such assets. The reference to “members of SPP” in the Electric IOUs Initial Comments may have been intended to apply to the group of companies with registered load and/or resources in the SPP Integrated Marketplace. These loads and resources are included in the SPP Balancing Authority Area and can participate in the full range of SPP Integrated Marketplace activities and services.

10. In contrast, those entities that do not have registered loads or resources in the SPP Integrated Marketplace are limited to the following market-related activity:

- a) Financial transactions, such as buying and selling Transmission Congestion Rights and executing virtual transactions;
- b) Selling energy into the market as a price taker;
- c) Purchasing energy on a bilateral basis from an SPP market resource; and
- d) Purchasing or supplying operating reserves through the Reserve Sharing Group (“RSG”). However, this service is specific to those external entities who are

⁹ Staff Reply Comments at paragraph 12.

¹⁰ Docket No. 17-SPPE-117-GIE, *Initial Comments of Kansas City Power & Light Company, the Empire District Electric Company, and Westar Energy, Inc.*, at paragraph 18 (April 21, 2017) (“Electric IOUs’ Initial Comments”).

members of the RSG and only in situations where a contingency on the system exceeds internal capabilities. The Reserve Sharing System is a function that is performed in coordination with the SPP Integrated Marketplace but is not a component of the market.

It is important to note that energy purchases, as described in item (c) above, are likely to be accompanied by pancaked transmission costs because of the need to move power across the seam of different transmission providers. The results of this pancaking effect include higher cost of such transactions and reduction in efficiency of market participation.

11. As noted above, from the standpoint of market-related costs and benefits, the key distinction is not between companies that have become SPP Members by signing the Membership Agreement and those that have not. Rather, the vital point is whether or not the company has registered load and/or generation in the SPP Integrated Marketplace. The load and generation registered in the market are included in the SPP Balancing Authority Area and have available the full range of SPP market activities and services. Companies that do not have registered load or generation can participate in the SPP Integrated Marketplace, but such participation is materially limited and is accompanied by higher transaction costs.

12. Among the primary activities and services available to load and generation registered in the SPP Integrated Marketplace are the following:

- a) Offer and sell energy, both day-ahead and real-time
- b) Bid for and buy energy in the day-ahead market and buy energy in the real-time market
- c) Offer and sell ancillary services: regulation (up and down), spinning reserve, and supplemental reserve; both day-ahead and real-time
- d) Buy ancillary services
- e) Bids and offers for virtual transactions
- f) Receive allocations of Auction Revenue Rights or Long-Term Transmission Congestion Rights associated with long-term transmission service
- g) Buy and sell Transmission Congestion Rights

13. As a result, companies without loads or resources registered in the SPP Integrated Marketplace do not participate in the bids and offers used to determine locational marginal prices for energy and ancillary services other than through virtual transactions for energy. Therefore, they are price-takers and their power supply and demand are not managed through the SPP

Integrated Marketplace's unit commitment and economic dispatch processes. In addition, they likely face additional costs when transacting with resources and loads in the SPP Integrated Marketplace because of pancaked rates resulting from the seam between multiple transmission providers.

IV. EXIT FEE ESTIMATIONS

14. In the Staff Reply Comments, Commission Staff asks for detail behind exit fee obligations for all the Kansas utilities and whether the exit fees estimated reflect the impact of revenues as an offset to the fees.¹¹ First, the exit fee estimates SPP provided to its Kansas Members included potential Schedule 11 revenues as an offsetting element. These revenues are based on the present value of the future stream of revenue requirements for transmission upgrades built by Kansas Transmission Owners under the SPP Tariff. Such revenues are applied as an offset against the projected Schedule 11 charges for transmission upgrades that would be due from those Kansas utilities. Although Section 4.3.1 of the SPP Membership Agreement requires payment of such revenue only for "transmission contracts executed before the Termination Date,"¹² the larger amount of the full revenue requirement of each upgrade is applied as an offset in order to simplify the current calculation and because it is unknown at this point what service would be under contract at a hypothetical future date. Therefore, the exit fee estimates for transmission facilities may be understated.

15. Second, the process of withdrawal and exit from the SPP Regional Transmission Organization are covered in the Section 8.7 of the SPP Bylaws¹³ and in Section 4 of the SPP Membership Agreement.¹⁴ There are two major financial portions of the exit/withdrawal obligations on exiting members: Existing Obligations¹⁵ and Financial Obligations for

¹¹ Staff Reply Comments at paragraph 12.

¹² Southwest Power Pool, Inc., Membership Agreement, First Revised Volume No. 3 ("SPP Membership Agreement") at Section 4.3.1.

¹³ See Southwest Power Pool, Inc., Bylaws, First Revised Volume No. 4 ("SPP Bylaws") at Section 8.7.

¹⁴ See SPP Membership Agreement at Section 4.

¹⁵ SPP Bylaws, Section 8.7.1 provides that Existing Obligations include a) Member's unpaid annual membership fee; (b) Member's unpaid dues, assessments, and other amounts charged under Section 3.8 of the Membership Agreement, section 8.4 of the Bylaws, or otherwise under the Bylaws, plus the Member's share of costs SPP customarily includes in such dues, assessments or other charges, but which as of the Termination Date SPP had not included in such dues, assessments or other charges; (c) Member's share (computed in accordance with the Bylaws) of the entire principal amounts of all SPP Financial Obligations outstanding as of the Termination Date; (d) Any costs, expenses or liabilities incurred by SPP directly due to the Termination, regardless of when incurred or payable, and including without limitation prepayment premiums or penalties arising under SPP Financial Obligations; and (e) Member's share (computed in accordance with the Bylaws) of all interest that will become due

Transmission Facilities.¹⁶ Section 8.7.2 of the Bylaws provides the formula for computation of a Member's Existing Obligation: $A = 100 [0.25(1/N) + 0.75(B/C)]$

Where: A = Member's share (expressed as a percentage)

N = Total number of Members

B = The Member's previous year Net Energy for Load

C = Total of factor B for all Members¹⁷

Existing Obligation amounts that are due from the exiting member will be invoiced within 30 days of the Termination Date and are due within 5 business days.¹⁸ Fulfillment of the Financial Obligations for Transmission Facilities are negotiated by SPP and the exiting member.¹⁹ Load Serving Entities ("LSE") are required to post a \$150,000 cash withdrawal deposit with the notice of withdrawal. Non-LSE's are required to post a \$50,000 deposit. This deposit is a pre-payment of the costs SPP incurs to process a Member's withdrawal from SPP. Additionally, any termination with respect to a Transmission Owner shall be subject to applicable Federal and state laws and regulatory approvals and procedures.²⁰

V. ESTIMATES FROM CONSULTING FIRM

16. In the Electric IOUs Initial Comments, the companies state that KCP&L has worked with a consultant to estimate the cost of the study described in their comments.²¹ Commission Staff asks which consulting firm provided that estimate.²² SPP does not have any knowledge of any communications or work done by any of the companies, but can provide some context into the costs of these types of studies. In the past few years, SPP has engaged different

for payment with respect to all interest bearing Financial Obligations after the Termination Date and until the maturity of all Financial Obligations in accordance with their respective terms ("Future Interest").

¹⁶ Section 4.3.3A of the SPP Membership Agreement provides that Financial Obligation for Transmission Facilities include: "Terminated Member shall remain financially responsible for all financial obligations incurred and costs allocated to its load for transmission facilities approved prior to the Termination Date." Section 4.3.3 of the SPP Membership Agreement provides that "[a]ny obligations relating to the construction of new facilities pursuant to an approved plan of SPP shall be negotiated between SPP and the Transmission Owner prior to the Termination Date so as to continue the Transmission Owner's construction obligation for facilities for which SPP has issued a notification to construct to the Transmission Owner prior to the Termination Date."

¹⁷ SPP Bylaws at Section 8.7.2.

¹⁸ See SPP Membership Agreement at Section 4.3.2(e)

¹⁹ See SPP Membership Agreement at Section 4.3.3

²⁰ See SPP Membership Agreement at Section 4.3.4.

²¹ Electric IOUs Initial Comments at paragraph 23.

²² Staff Reply Comments at paragraph 12.

consultants to assist in the completion of large studies that determine costs and benefits to the study participants. In general, these studies cost in the hundreds of thousands of dollars. In SPP's initial comments to the KCC in this proceeding, SPP references these studies and the costs to SPP and its Members to complete.²³

VI. REQUIRED SERVICES IN RTO FORMATION

17. Commission Staff asks 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 and which services would be assumed by the utilities individually.²⁴ On December 20, 1999, FERC amended its regulations under the Federal Power Act ("FPA") to advance the formation of RTOs.²⁵ FERC Order No. 2000 established four (4) minimum characteristics and eight (8) minimum functions for a transmission entity to qualify as an RTO.²⁶

18. The minimum RTO characteristics established in Order 2000 are:

1. Independence from Market Participants: To achieve independence, the FERC proposed that RTOs must satisfy three conditions. First, the RTO, its employees, and any non-stakeholder directors must not have any financial interests in any market participants.²⁷ Second, the RTO must have a decision-making process that is independent of control by any market participant or class of participants.²⁸ Third, the RTO must have exclusive and independent authority to file changes to its transmission tariff with the Commission under section 205 of the FPA.²⁹
2. Appropriate Scope and Regional Configuration: The RTO must serve an appropriate region – a region of sufficient scope and configuration to permit the RTO to effectively perform its required functions and to support efficient and

²³ Docket No. 17-SPPE-117-GIE, *Comments of Southwest Power Pool, Inc.*, at paragraph 21 (April 21, 2017).

²⁴ Staff Reply Comments at paragraph 12 (May 22, 2017).

²⁵ *Regional Transmission Organizations*, Order No. 2000, 1996-2000 FERC Stats. & Regs., Regs. Preambles ¶ 31,089 (1999) ("Order No. 2000"), *order on reh'g*, Order No. 2000-A, 1996-2000 FERC Stats. & Regs., Regs. Preambles ¶ 31,092 (2000), *aff'd sub nom. Pub. Util. Dist. No. 1 v. FERC*, 272 F.3d 607 (D.C. Cir. 2001).

²⁶ Order No. 2000, p. 5.

²⁷ Order No. 2000, n. 176 (citing FERC Stats. & Regs. ¶ 32,541 at 33,726).

²⁸ *Id.* at n. 177 (citing FERC Stats. & Regs. ¶ 32,541 at 33,727).

²⁹ *Id.* at n. 178 (citing FERC Stats. & Regs. ¶ 32,541 at 33,729).

nondiscriminatory power markets.³⁰ There are also factors to be considered to indicate that boundaries should facilitate essential RTO functions and goals, recognize trading patterns, mitigate the exercise of market power, do not unnecessarily split existing control areas or existing regional transmission entities, encompass contiguous geographic areas and highly interconnected portions of the grid, and take into account useful existing regional boundaries (such as NERC regions) and international boundaries.³¹

3. Possession of Operational Authority for All Transmission Facilities Under the RTO's Control: An RTO must have operational authority for all transmission facilities under its control and also must be the security coordinator for its region.³² Another necessary aspect of operational control as set out by the FERC is that the RTO is also required to be the North American Electric Reliability Corporation's ("NERC") security coordinator for its region. The role of a security coordinator is to ensure reliability in real-time operations of the power system. The FERC mandates the RTO to operate the transmission system through direct physical operation by RTO employees, contractual agreements with other entities (e.g., transmission owners and control area operators) or implement a hierarchical control structure involving a combination of direct and functional control.³³
4. Exclusive Authority to Maintain Short-Term Reliability (Characteristic 4): The RTO must have exclusive authority for maintaining the short-term reliability of the grid that it operates.³⁴ It includes all time periods, including but not limited to "real-time," necessary for the RTO to satisfy its reliability responsibilities, up to the planning horizon.³⁵

³⁰ Order No. 2000, n. 335 (citing FERC Stats. & Regs. at 33,729).

³¹ Order No. 2000, p. 238.

³² Order No. 2000, p. 277.

³³ Order No. 2000, p. 281.

³⁴ Order No. 2000, p. 315.

³⁵ Order No. 2000, p. 316.

19. The minimum RTO functions established in Order 2000 are:

1. Tariff Administration and Design (Function 1): The RTO must be the sole provider of transmission service and sole administrator of its own open access tariff. Included in this is the requirement that the RTO have the sole authority for the evaluation and approval of all requests for transmission service including requests for new interconnections.³⁶
2. Congestion Management: An RTO must ensure the development and operation of market mechanisms to manage congestion.³⁷ Upon start-up, the RTO must have in place effective protocols for managing congestion while preserving reliability.³⁸
3. Parallel Path Flow: An RTO should develop and implement procedures to address parallel path flow issues within its region and with other regions on the date of initial operation.³⁹
4. Ancillary Services: An RTO must serve as the provider of last resort of all ancillary services required by Order No. 888 and subsequent orders.⁴⁰
5. OASIS and Total Transmission Capability and Available Transmission Capability: An RTO must be the single OASIS site administrator for all transmission facilities under its control.⁴¹
6. Market Monitoring: RTO proposals must contain a market monitoring plan that identifies what the RTO participants believe are the appropriate monitoring activities the RTO, or an independent monitor, if appropriate, will perform.⁴²

³⁶ Order No. 2000, p. 330.

³⁷ Order No. 2000, p. 380.

³⁸ Order No. 2000, p. 386.

³⁹ Order No. 2000, pp. 390, 392.

⁴⁰ Order No. 2000, p. 420.

⁴¹ Order No. 2000, p. 432.

⁴² Order No. 2000, p. 462.

7. Planning and Expansion: An RTO must have ultimate responsibility for both transmission planning and expansion within its region that will enable it to provide efficient, reliable and non-discriminatory service and coordinate such efforts with the appropriate state authorities.⁴³
8. Interregional Coordination: An RTO must develop mechanisms to coordinate its activities with other regions whether or not an RTO yet exists in these other regions.⁴⁴

WHEREFORE, SPP respectfully requests the Commission consider these reply comments in this matter.

Respectfully submitted,

/s/ Thomas E. Wright

Thomas E. Wright, S.Ct. #06115
MORRIS, LAING, EVANS, BROCK & KENNEDY, CHTD.
800 SW Jackson, Suite 1310
Topeka, KS 66612-1216
(785) 232-2662 Fax: 232-9983
twright@morrislaing.com

and

Tessie Kentner AR # 2007240
Managing Attorney
Kandi N. Hughes AR # 2010029
Attorney
Southwest Power Pool, Inc.
201 Worthen Drive
Little Rock, Arkansas 72223
Telephone: (501) 688-1782
Facsimile: (501) 482-2022
Email: tkentner@spp.org
khughes@spp.org

Attorneys for Southwest Power Pool, Inc.

⁴³ Order No. 2000, p. 485.

⁴⁴ Order No. 2000, p. 494.

VERIFICATION
K.S.A. 53-601

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I verify under penalty of perjury that the foregoing is true and correct.

/s/ Thomas E. Wright
Thomas E. Wright

Executed on June 20, 2017.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above Reply Comments was sent via email, this 20th day of June, 2017, to the following:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

/s/ Thomas E. Wright
Thomas E. Wright