

BEFORE THE STATE 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) Docket No. 18-KPPE-343-COC
Business of an Electric Public Utility in the State of Kansas)
for Transmission Rights Only in Cross Service Territory of)
Southern Pioneer Electric Company and Ninnescah Rural)
Electric Company)

DIRECT TESTIMONY OF

CLARENCE D. SUPPES
SENIOR MANAGER OF TRANSMISSION ENGINEERING

ON BEHALF OF

MID-KANSAS ELECTRIC COMPANY, INC.

JULY 9, 2018

1 **Q. Please state your name and business address.**

2 A. My name is Clarence D. Suppes. My business address is 2300 Broadway Avenue, P.O.
3 Box 170, Great Bend, Kansas 67530.

4 **Q. By whom are you employed?**

5 A. I am employed by Sunflower Electric Power Corporation (“Sunflower”) as the Senior
6 Manager of Transmission Engineering. By agreement, Sunflower, through its employees,
7 operates Mid-Kansas Electric Company, Inc. (“Mid-Kansas”). That said, I also serve in
8 the same position for Mid-Kansas.

9 **Q. Please provide your educational background.**

10 A. I hold a Bachelor of Science Degree in Electric Engineering from Kansas State
11 University.

12 **Q. Please provide your professional background.**

13 A. I have been employed as an engineer in the electric utility industry for 36 years. I began
14 my career at Centel Corporation in 1982. In 1990, I transferred into the Transmission
15 Engineering Department as a Transmission Line Engineer. In 1997, with the then named
16 company of WestPlains Energy, I was promoted to the Director of Transmission
17 Engineering for the Kansas and Colorado properties. In 2007, Mid-Kansas acquired the
18 Kansas properties of the then named company Aquila, Inc., d/b/a Aquila Networks -
19 WPK. At that time, I accepted the position as Manager of Transmission Engineering for
20 Sunflower. Today, I am the Senior Manager of Transmission Engineering for Sunflower.
21 As I referenced above, Sunflower manages facilities for both Sunflower and Mid-Kansas.

22 **Q. Please state the duties and responsibilities of your current position.**

23 A. As the Senior Manager of Transmission Engineering, I am responsible for overseeing the

1 entire transmission engineering department. That includes overseeing the transmission
2 facilities owned and operated by Mid-Kansas and Sunflower.

3 **Q. Have you previously prepared or presented testimony before the Commission?**

4 A. No, I have not.

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

6 A. I am providing testimony regarding the technical capability of Mid-Kansas, as well as its
7 experience in operating its system, including the high side (115kV) of interconnections to
8 the Mid-Kansas 115kV system.

9 **Q. Are you familiar with the filing by KPP for the issuance of a certificate of**
10 **convenience for transmission rights only?**

11 A. Yes. I am familiar with the filing. I have read the testimony of Mr. Larry Holloway and
12 the description of the KPP Kingman Direct Connection project he has proposed to be
13 certificated.

14 **Q. Are you also familiar with Southern Pioneer's SemCrude Substation Upgrade,**
15 **which is being proposed by Southern Pioneer Electric Company ("Southern**
16 **Pioneer") as an alternative to the KPP Direct Connection?**

17 A. Yes, Southern Pioneer has coordinated with Mid-Kansas regarding the SemCrude
18 Substation Upgrade.

19 **Q. For the KPP Direct Connection, has KPP given any indication as to what entity**
20 **would own the high side (115kV) of that interconnection?**

21 A. In KPP's response to Southern Pioneer data request 9,¹ KPP has indicated that KPP will
22 own the high side of the interconnection. In other words, Mid-Kansas would own the

¹ Attached hereto as **Exhibit CDS-1**.

1 Gang Operated Air Break (“GOAB”) switch and switch structure that connects to Mid-
2 Kansas’s 115kV transmission line, and a conductor span into what will likely be an A-
3 Frame owned by KPP inside KPP’s substation. It is also likely that Mid-Kansas would
4 own some small communications equipment inside KPP’s substation. KPP would own
5 and be responsible for everything else inside KPP’s substation. The final ownership of
6 all component pieces will be determined in the design and engineering process.

7 **Q. For Southern Pioneer’s SemCrude Substation Upgrade option, what entity would**
8 **own the high side?**

9 A. Southern Pioneer’s SemCrude Substation Upgrade option entails upgrading the existing
10 SemCrude Substation. Southern Pioneer primarily owns the high side, but Mid-Kansas
11 maintains the high side of that substation for Southern Pioneer, and that will remain
12 unchanged. Mid-Kansas tests the relays for the transformer, as well as the batteries for
13 the protective equipment.

14 **Q. Why is that distinction between the KPP Kingman Direct Connection and Southern**
15 **Pioneer’s SemCrude Substation Upgrade option relevant?**

16 A. While I am not a lawyer, my understanding is that when determining whether to grant a
17 certificate of convenience and necessity, the Commission will consider the technical
18 capabilities of the applicant. Because Southern Pioneer is proposing the SemCrude
19 Substation Upgrade option as an alternative to the Kingman Direct Connection in this
20 proceeding, it is important to note the technical capabilities of the different entities that
21 will be responsible for the high side of either option.

22 **Q. How many miles of transmission lines does Mid-Kansas own, operate, and**
23 **ultimately have responsibility over?**

1 A. Mid-Kansas is responsible for the ownership and operation of approximately 1251 miles
2 of transmission lines. Mid-Kansas's sister utility, Sunflower, is responsible for the
3 ownership and operation of another approximately 1205 miles of transmission lines.
4 Mid-Kansas and Sunflower share an employee base, so one set of personnel is
5 responsible for a combined 2456 miles of transmission lines between their
6 responsibilities for both entities.

7 **Q. How many miles of transmission lines does KPP own operate, and ultimately have**
8 **responsibility over?**

9 A. I would have to defer that question to KPP, but I am comfortable in stating that it is
10 nowhere near 2456. My understanding, subject to correction by KPP, is that KPP does
11 not own any facilities with higher voltage than 69kV, and most of the KPP-owned
12 facilities are distribution in nature. The challenges of owning and operating high voltage
13 transmission facilities (ex. 115kV and above) are very different from those associated
14 with distribution facilities. The higher the voltage of the facilities, the more challenging
15 its ownership, operation, and maintenance.

16 **Q. Both the KPP Direct Connection and the SemCrude Substation Upgrade option**
17 **involve a 115kV/34.5kV substation, which is a transmission to distribution**
18 **substation. How many transmission to distribution substations does Mid-Kansas**
19 **have connected to its system?**

20 A. Approximately 52 transmission to distribution substations. Sunflower has approximately
21 40 transmission to distribution substations. Between the two companies—which rely on
22 the same set of personnel—that is just over 90 such substations. Most of those are
23 interconnections with Sunflower/Mid-Kansas members.

1 **Q. Could you please briefly describe experience of the personnel within Sunflower that**
2 **are directly responsible for operations and maintenance of Sunflower/Mid-Kansas**
3 **transmission facilities and transmission to distribution substations?**

4 A. Absolutely. At the top would be Peter Prast, the Executive Manager of Transmission.
5 Mr. Prast has 39 years of experience in the electric utility industry, primarily in the
6 transmission operations and maintenance realm. He has held his position with Mid-
7 Kansas since 2014, and currently oversees all transmission operations and maintenance of
8 Mid-Kansas transmission facilities. Underneath Mr. Prast is an entire team of individuals
9 with a vast amount of experience in transmission operations and maintenance. For a
10 complete listing of the individuals under Mr. Prast's direction, please see **Exhibit CDS-2**
11 **Transmission Operations and Maintenance Organizational Chart.**

12 **Q. Are any of the directly aforementioned individuals at locations that are convenient**
13 **for performing operations and maintenance on the high side of the SemCrude**
14 **Substation Upgrade option?**

15 A. Yes, these qualified personnel are at locations throughout Kansas, with many located in
16 Great Bend, approximately 45 minutes from the SemCrude Substation. From my
17 experience in the electric utility industry, having "boots on the ground" with respect to
18 operations and maintenance is a very valuable and essential asset, especially with respect
19 to safety and reliability.

20 **Q. What is your understanding of KPP's operations and technical expertise in**
21 **maintaining and operating transmission to distribution substations?**

22 A. My understanding is limited to the response of KPP to Southern Pioneer data request 9.
23 (*See*, Exhibit CDS-1) According to the response KPP does not have staff within KPP to

1 run and operate the substations. KPP will have to rely primarily upon contract service
2 which they have not identified at this stage.

3 **Q. Does ownership of the high side of a 115kV/34.5kV substation come with any North**
4 **American Electric Reliability Corporation (“NERC”) compliance obligations?**

5 A. The transmission engineering group that I oversee is very involved in the process of
6 ensuring NERC compliance. I can tell you that such ownership can come with NERC
7 compliance obligations. At this time, with the current configuration, there are none,
8 however, there are multiple scenarios where these facilities could become bulk electric
9 system (“BES”) facilities which could then trigger NERC compliance obligations.

10 **Q. Do you feel that Mid-Kansas has the technical capability to own, operate, or**
11 **maintain transmission facilities in Kansas, including, but not limited to the high side**
12 **of a transmission to distribution substation interconnection?**

13 A. Absolutely. In fact, Southwest Power Pool, Inc. (“SPP”) has determined that Mid-Kansas
14 is a Qualified Participant, which means it has met the criteria specified in Attachment Y
15 of the SPP tariff. The three specific criteria areas that must be met are membership,
16 financial and managerial. Part of the requirements of being a Qualified Participant is to
17 submit to the SPP a Qualified Request for Proposal Participant Application (“QRP
18 Application”) every 5 years for the purpose of re-qualifying as a participant for requests
19 for proposal from SPP. The most recent QRP Application was submitted in 2014. The
20 QRP Application provides a good general overview of Mid-Kansas’ technical capabilities
21 with regard to owning, operating, and maintaining transmission facilities. While I do not
22 oversee every aspect of that document, I help prepare the portions relevant to my
23 department, and am generally familiar with its contents.

1 **Q. Does this conclude your testimony?**

2 A. Yes.

My Appointment Expires: April 30, 2022

KANSAS POWER POOL SUPPLEMENTAL RESPONSE TO SOUTHERN PIONEER
ELECTRIC COMPANY INFORMATION REQUEST #9

| | |
|---------------|-------------------|
| Company Name | Kansas Power Pool |
| Docket Number | 18-KPPE-343-COC |
| Request Date | May 15, 2018 |
| Response Date | June 14, 2018 |

Please Provide the Following:

State who in KPP will operate and maintain the proposed 34.5 kV line and 115-34.5 kV substation for the Kingman Direct Connection? If not someone in KPP, please state who will be performing those functions.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, KPP will be ultimately responsible for the operation and maintenance of the Kingman Direct Connection facilities. However, the identity and qualifications of KPP's contractors, engineers, operators, or maintenance providers is not relevant to this proceeding. KPP already has a certificate in Kansas to provide transmission service, granted under the municipal energy act. The only relevant issue in this docket is whether or not the proposed certificate for transmission rights only is in the public interest. It is already presumed under Kansas law that a legally formed municipal energy agency, such as KPP, may provide transmission service.

Supplemental Response:

The City of Kingman will operate and maintain the 34.5 KV line from Kingman to the substation and perform any required routine maintenance, as well as any required operations of the substation. KPP will contract for substation routine maintenance and testing with a qualified third party, much as Westar and others do today. In fact, KPP has already had informal discussions with Shelley Electric of Wichita, and they have stated they do exactly the same type of service for Westar Energy substations. KPP is also aware of several other local qualified contractors that do similar work. Furthermore, James Ging, KPP's Director of Engineering Services, was formerly the Director of Electric and Water Utilities for the City of Winfield and has overseen similar contracts for service on their 69 kV substations. It should be noted here that KPP is already a transmission owner under the SPP membership agreement and Southern Pioneer is not.

Submitted By: Kansas Power Pool

Submitted To: Southern Pioneer Electric Company

Sunflower Electric Power Corporation
Transmission Operations & Maintenance
Transmission Lines – Staffing 29
Transmission Asset Management/Supervision – Staffing 7
Substations – Staffing 20
Substation Automation and Protection – Staffing 11
Metering – Staffing 6

