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State Corporation Commission
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February 9, 2018

Lynn Retz
Secretary to the Commission
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

RE: *Contingent Application of Kansas Power Pool for a Certificate of Convenience*

Dear Ms. Retz:

Enclosed you will find the Application of the Kansas Power Pool for transmission rights only. The attached Application describes a line from the existing City of Kingman 34.5 KV line north of Cunningham in Kingman County to a new substation proposed to be built on NE 140th Ave on the West side of Section 24 Township 27S Range 11W in Pratt County. As noted in the Application, this project is contingent upon the outcome of KCC Docket 17-KPPE-092-COM.

I have also enclosed a copy of the notice required by K.A.R. 82-12-5, which we sent out today.

As soon as you have a docket number for this matter, I would appreciate notification. Otherwise, please notify me as soon as the scheduling conference is set.

Please feel free to contact me with any questions.

Very truly yours,

TRIPLETT WOOLF GARRETSON, LLC

By Amy Fellows Cline

AFC
Enclosure



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February 9, 2018

Southern Pioneer Electric Company
PO Box 430
Ulysses, KS 67880

Ninnescah Rural Electric Company
PO Box 967
Pratt, KS 67123

United Telephone Association
PO Box 117
Dodge City, KS 67801

Kansas Gas Service
PO Box 219046
Kansas City, MO 64121

Northern Natural Gas Company
1111 South 103rd St.
Omaha, NE 68124

RE: *Contingent Application of Kansas Power Pool for a Certificate of Convenience*

Dear Sir/Madam:

Enclosed you will find the application of the Kansas Power Pool for transmission rights only within ½ mile of your facilities. The attached application describes a line from the existing City of Kingman 34.5 KV line north of Cunningham in Kingman County to a new substation proposed to be built on NE 140th Ave on the West side of Section 24 Township 27S Range 11W in Pratt County. To comply with K.A.R. 82-12-5, this letter serves as a written notice.

Please note that this project is contingent upon the outcome of KCC Docket 17-KPPE-092-COM. Please feel free to contact me with any questions.

Very truly yours,

TRIPLETT WOOLF GARRETSON, LLC

By Amy Fellows Cline

AFC
Enclosure
cc: Lynn Retz, Secretary to the Commission

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

Before Commissioners: Shari Feist Albrecht, Chair
 Jay Scott Emler, Commissioner
 Pat Apple, Commissioner

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)	Docket No.
in the State of Kansas for transmission rights only)	
to cross service territory of Southern Pioneer)	18-KPPE-343-COC
Electric Company and Ninnescah Rural Electric)	
Company)	

APPLICATION

COMES NOW the Kansas Power Pool (KPP), by and through its undersigned counsel, and files this Application to contingently seek a Certificate of Convenience and Authority granting KPP the right to transact the business of an electric public utility for transmission rights only to cross service territory of Southern Pioneer Electric Company and Ninnescah Rural Electric Company. This Application is filed pursuant to K.S.A. 66-131 and other applicable statutes. In support thereof, KPP states as follows:

I. Background

1. KPP is a municipal energy agency formed under K.S.A. 12-885, *et seq.* KPP provides wholesale capacity, energy and transmission services to its members, who have all signed KPP's Amended Operating Agreement. Currently, KPP serves 24 Kansas municipal electric utilities. The city of Kingman, Kansas (Kingman) joined KPP in 2007. Sixteen of KPP's members are in the Westar Energy transmission zone, seven are in the Mid-Kansas Electric Company (MKEC) zone, and one is in the Midwest Energy zone.

2. Much of Kingman County is served by the very Eastern portion of the MKEC electric system (the old Aquila system). Historically, Kingman was connected by a 34.5 kV line now owned by Wheatland Electric Cooperative, Inc. (WEC) that runs North out of the MKEC Harper substation. This undersized transmission line was only able to deliver 2 MegaWatts (MW) of power to Kingman. Because Kingman has about a 12 MW peak load, Kingman had to self-generate the remaining power the city required, using large diesel engine generators. This situation improved somewhat in 2005, when Kingman (at its own expense) constructed about twenty-six miles of 34.5 kV composite core conductor line West out of Kingman, to the town of Cunningham, in order to connect with an Aquila 34.5 kV line that ran about eighteen miles east out of the Pratt substation. While this new line increased Kingman's energy import capability to 6 MW, it did not allow Kingman to import all of the power it needs. The result was that Kingman's operation of internal power generation was reduced to about five months out of the year.

3. The old Aquila 34.5 kV line to which Kingman is connected with its new 34.5 kV line is now owned and operated by Southern Pioneer Electric Company (Southern Pioneer). Thus, KPP (on behalf of its member, Kingman) is a wholesale local access customer of Southern Pioneer and currently pays Southern Pioneer for local access delivery service (LADS) over Southern Pioneer's 34.5 kV line, in order to connect to Mid-Kansas Electric Company, LLC's (MKEC) nearby 115 kV Ninnescah line.

4. On September 28, 2015, KPP submitted a formal request with SPP pursuant to Attachment AQ of the SPP OATT ("AQ Request") to change the current Kingman Network Load local delivery point from the current local delivery point on the Southern Pioneer 34.5 kV line in Cunningham, KS to the Ninnescah Transmission Line near the Northern Natural compressor station, approximately 2 miles west and 2½ miles north of the City of Cunningham. The AQ

Request indicated that a new 115-34.5 kV substation would be constructed to interconnect with a new 34.5 kV line, in order to provide Kingman with full import service for Kingman's 12 MW Network Load, as well as generation export service for Kingman's behind-the-meter generation resources (the Kingman Direct Connection). The new facilities would traverse service territory of Southern Pioneer and Ninnescah Rural Electric Company.

5. On December 3, 2015, KPP submitted a formal request for interconnection to MKEC, regarding interconnection of the newly-proposed KPP facilities to the MKEC Ninnescah Transmission Line.

6. On September 8, 2016, Southern Pioneer filed a Complaint against KPP, asking the Commission to enjoin KPP from installing this new transmission interconnection or, in the alternative, to require KPP to pay Southern Pioneer monetary damages (which Southern Pioneer calls a "facility switching fee") in the amount of \$2,505,077.29. Southern Pioneer claims the Commission has jurisdiction over the issues raised and relief requested in its Complaint because K.S.A. 60-101 generally gives the Commission "full power, authority and jurisdiction to supervise and control" electric public utilities. The Docket Number for Southern Pioneer's Complaint against KPP is 17-KPPE-092-COM.

7. Per the February 8, 2018 Order Adopting Revised Procedural Schedule, an evidentiary hearing is scheduled in Docket No. 17-KPPE-092-COM on April 16 and 17, 2018, and the Commission's Order is due June 28, 2018.

8. If KPP is successful in Docket No. 17-KPPE-092-COM, it intends to proceed with the Kingman Upgrade. As such, KPP would be engaging in the business of an electric transmission Corporation and promoting the public convenience in the following described territory in Kansas, to wit:

The Kingman Upgrade project involves building approximately 4.5 miles of 34.5 KV line constructed according to NESC standards. This line will continue from the existing 34.5 KV line owned and operated by the City of Kingman. It starts at the intersection of NW 10th St and N Stadium St just North of Cunningham KS in Kingman County. It continues West 1.5 miles along NW 10th St to NE 150th Ave (along the West half of the North boundary of Section 32 and the entire North boundary of Section 31-T27S-R10W). Then North 2 miles to NE 30th St (along the West boundary of Section 30 and 19 - T27S - R 10W). Then West along NE 30th St 1 mile to NE 140th Ave in Pratt County (along the north boundary of Section 24 - T27S - R11W). Then South along NE 140th Ave .5 miles (along the West boundary of section 24 - T27S - R11W) terminating at a new 115KV to 34.5 KV substation to be built by the Kansas Power Pool.

A map of the proposed Kingman Upgrade is attached hereto as Exhibit 1.

9. The other utilities of the same classification as this Applicant now operating in or adjoining the above-described territory are:

- Southern Pioneer Electric Company, PO Box 430, Ulysses KS 67880
- Ninnescah Rural Electric Cooperative, PO Box 967, Pratt, KS 67124
- United Telephone Assn., PO Box 117, Dodge City, KS 67801
- Kansas Gas Service, PO Box 219046, Kansas City, MO 64121
- Northern Natural Gas Company, 1111 South 103rd Street, Omaha NE 68124

10. The above-described territory is now being served by Southern Pioneer and Ninnescah Rural Electric Cooperative.

WHEREFORE, KPP respectfully requests that, contingent upon a successful outcome for KPP in Docket No. 17-KPPE-092-COM, the Commission issue KPP a Certificate of Convenience and Authority granting KPP the right to transact the business of an electric public utility for transmission rights only to cross service territory of Southern Pioneer Electric Company and Ninnescah Rural Electric Company, and for such other and further relief as the Commission deems just and proper.

By: /s/ Amy Fellows Cline

Timothy E. McKee, #07135

Amy Fellows Cline, #19995

Triplett Woolf Garretson, LLC

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Attorneys for Kansas Power Pool

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

James Ging, of lawful age, being first duly sworn upon my oath, state that I am the Director of Engineering Services of the Kansas Power Pool; that I have read the above Application; that I know the contents thereof and declare that the statements made therein are true and correct to the best of my knowledge and belief.



James Ging

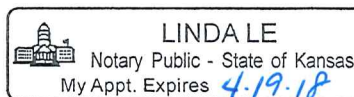
SUBSCRIBED AND SWORN to before me this 9th day of February, 2018.



Notary Public

My Appointment Expires:

April 19, 2018



T 27 S

New 115KV Sub
Built by Kansas Power Pool

