

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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

JOINT MOTION FOR EXTENSION OF TIME TO FILE COMMENTS

COME NOW, Midwest Energy, Inc. (“Midwest”), along with Kansas City Power & Light Company, Westar Energy, Inc., Kansas Municipal Energy Agency, Kansas Electric Power Cooperative, Inc., Kansas Power Pool, Sunflower Electric Power Corporation, Mid-Kansas Electric Company, LLC, ITC Great Plains, LLC, The Empire District Electric Company, and Southwest Power Pool, Inc. (collectively, the “Joint Movants”), and respectfully request that the State Corporation Commission of the State of Kansas (“Commission” or “KCC”) issue an order granting the parties an extension of time for an additional sixty (60) days in which to file comments responsive to the Commission’s January 19, 2017 Order Opening General Investigation (“January 19, 2017 Order”). In support of its joint motion for extension of time, Joint Movants state as follows:

1. In its January 19, 2017 Order, the Commission noted that in Docket No. 14-SPPE-563-SHO the KCC Staff (“Staff”) recommended “that a general investigation be opened: (1) to investigate the value of requiring SPP to file periodic or annual reports to the Commission addressing the benefits of continued SPP membership for Kansas utilities; and (2) to investigate the value of requiring regulated Kansas SPP-member Transmission Owners (TOs) to file periodic or annual reports addressing utility specific benefits of continued SPP membership for each utility’s retail ratepayers.”

2. In its January 19, 2017 Order, the Commission indicated its desire to engage in “a thorough and thoughtful discussion as to whether such reporting is in the public interest and, if so, what information the report and any associated study should entail.” The Commission requested that interested parties file comments regarding the sixteen (16) questions from Staff’s September 29, 2016 Report and Recommendation in Docket No. 17-SPPE-117-GIE (“September 29, 2016 Staff R&R”), along with any other questions or information the parties deem relevant to the issue of the costs and benefits of continued participation in Southwest Power Pool, Inc. (“SPP”).

3. The questions from the September 29, 2016 Staff R&R upon which the Commission requested comments are as follows:

- (a) In the event that the Commission requires a study to determine the costs and benefits associated with continued membership in SPP, what specific parameters should be included in the study?
- (b) Should the study be limited to a comparison of production cost savings associated with the Integrated Market (IM) versus the increased transmission expense and SPP Administration expense associated with membership in SPP?
- (c) Should two separate cost/benefit studies be completed with one on the cost/benefits of the IM and the other on the cost/benefits of the transmission system?
- (d) Should the study be performed by an independent third party consultant, or can this analysis be performed by internal expertise within the utilities?
- (e) How often should such a study be updated once performed?
- (f) How quantifiable and objective would such an analysis be?
- (g) Without a study, is it possible to say with certainty whether Kansas ratepayers are better off today with Kansas electric utilities being members of SPP? Would it be possible after the study?

- (h) What evidence exists today regarding the costs/benefits of SPP membership that Kansas ratepayers are benefitting from Kansas utility participation in SPP?
- (i) Over what time period should the study cover? Should the study cover the last five years, ten years, or only since the implementation of the IM?
- (j) Should the study attempt to reflect the anticipated costs and benefits of continued SPP membership for the foreseeable future using data that is known or that can be determined with certainty today?
- (k) What alternatives to SPP membership exist for Kansas electric utilities today?
- (l) Should the study, if required, compare the costs and benefits of SPP to membership in the Midwest Independent System Operator (MISO)?
- (m) What other Regional Transmission Organizations or regional transmission planning entities, if any, should be considered in the analysis of alternatives?
- (n) Is it feasible for Kansas to form its own regional transmission planning entity similar to what New York and California have done? If so, should the costs and benefits of that possibility be evaluated in this study?
- (o) If Kansas utilities were not members of SPP, would there still be opportunities to pursue economy energy sales/purchases from the IM? Would other entities or SPP still use transmission facilities owned by Kansas utilities? To what extent should this be included in the effects of a possible cost/benefit study?
- (p) If Kansas utilities were not members of SPP, would there still be opportunities for Kansas utilities to sell transmission capacity on the facilities located in Kansas and owned by Kansas utilities? To what extent should this be included in the effects of a possible cost/benefit study?

4. The Commission directed interested parties to file initial comments within thirty (30) days of the January 19, 2017 Order. Thus, comments are due on February 18, 2017, and, because February 18, 2017 falls on a Saturday, the due date becomes Monday, February 20, 2017 in accordance with K.A.R. 82-1-217(a).

5. The questions posed in the September 29, 2016 Staff R&R are complex and will require significant thought, discussion, research, time, and potentially collaboration among the

parties and SPP. Joint Movants submit that an additional sixty (60) days from the comment deadline established in the January 19, 2017 Order would assist parties with reviewing data and studies and crafting comments to aid the Commission in establishing a record in this proceeding.

6. Additionally, many of the entities that will likely prepare and submit comments have been engaged in the evidentiary hearing in Docket No. 16-KCPE-593-ACQ, Great Plains Energy Incorporated's acquisition of Westar, Inc., that adjourned on February 7, 2017. A comment deadline of February 20, 2017 unnecessarily compresses the parties' ability to prepare detailed comments for the Commission's consideration.

7. Joint Movants have discussed this joint motion for extension of time with both Staff and the Citizens' Utility Ratepayer Board, and neither party has voiced any objections to either the filing of this joint motion or the requested extension of time.

WHEREFORE, Joint Movants hereby request an Order granting this Joint Motion for Extension of Time and for any such further relief that the Commission may deem just and appropriate.



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VERIFICATION

STATE OF Missouri)
)ss.
COUNTY OF JACKSON)

Anne E. Callenbach, of lawful age, being first duly sworn, on oath deposes and states:

That she is counsel to Midwest Energy, Inc. in the above-referenced matter; that she has read the above and foregoing document, knows and understands the contents thereof and states that the statements and allegations contained therein are true and correct, according to her knowledge, information and belief.

Further affiant sayeth not.

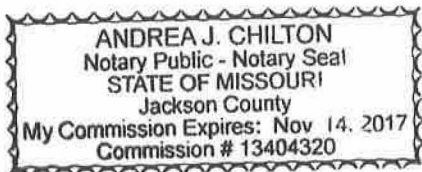
ACallenbach

Subscribed and sworn to before me this 9th day of February, 2017.

My Appointment Expires:

Andrea J. Chilton

Notary Public in and for said
County and State



CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing pleading has been _____ emailed, _____ faxed, X hand-delivered and/or mailed, First Class, postage prepaid, this February 9, 2017, to:

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