

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

In the Matter of the Investigation into the)
Principles and Priorities to be Established for)
Evaluating the Reasonableness of the Location) Docket No. 24-GIME-102-GIE
of a Proposed Transmission Line in Future Line)
Siting Proceedings)

ITC GREAT PLAINS, LLC’S POST-WORKSHOP REPLY COMMENTS

COMES NOW, ITC Great Plains, LLC (“ITC”) and files its Post-Workshop Reply Comments (“Comments”). ITC appreciates the opportunity to provide comments and support the Kansas Corporation Commission (“Commission”) in its efforts to streamline the transmission line siting process. ITC values the thoughtful contributions from Intervenors and recognizes the importance of balancing various interests in the route study process for high voltage transmission line (“HVTL”) proposals. ITC concurs with Grain Belt Express LLC’s perspective that the state of Kansas would benefit from a decision in this proceeding that maintains flexibility and discretion for applicants, considering the unique topography, landowner preferences, critical habitats, and other factors specific to each study area.¹ ITC also incorporates its comments filed previously in this docket. In support of its Comments, ITC states as follows.

I. RELEVANT BACKGROUND

1. This proceeding was initiated by the Commission through its Order Opening General Investigation on August 3, 2023. The purpose of the General Investigation is to consider

¹ See, Grain Belt Express LLC’s Post-Workshop Comments to Staff’s Kansas Line Siting Principles and Priorities, filed November 8, 2024 (“Grain Belt Post-Workshop Comments”), p. 4.

“the principles and priorities to be established by the Commission for evaluating the reasonableness of the location of a proposed transmission line.”²

2. Staff filed its first Report and Recommendation (“First R&R”) on December 1, 2023, and its Second Report and Recommendation (“Second R&R” and together with the First R&R, the “R&Rs”) on March 15, 2024. ITC, along with the various other Intervenors, filed responses to each of the R&Rs.

3. Following the Second R&R, a Procedural Schedule was established which provided for Intervenors’ Initial Comments on September 20, 2024, and Staff and Intervenor Reply Comments on October 4, 2024. Additionally, the Procedural Schedule included a Technical Workshop on Friday, November 1, 2024. Pursuant to the Procedural Schedule, ITC filed Initial Comments and participated in the Technical Workshop (“Workshop”).³

4. On October 31, 2024, Commission Staff (“Staff”) circulated a proposal modifying Staff’s prior recommendations (“Proposal”).⁴ Staff’s Proposal was discussed extensively at the Workshop. To allow for additional time to consider information shared at the Workshop and to give Intervenors time to respond to post-Workshop comments, Staff filed a Motion for Modification of the Procedural Schedule on November 4, 2024. The Modified Procedural Schedule contemplated Initial Post-Workshop Comments from Intervenors on November 8, 2024, and post-Workshop Reply Comments on November 22, 2024.

² Order Opening General Investigation, p. 3.

³ In addition to ITC, the following intervenors have also filed comments at various points in this proceeding: Evergy Kansas Central, Inc. and Evergy Kansas South (together as “Evergy Kansas Central”) and Evergy Metro, Inc. (“Evergy Kansas metro”) (collectively, “Evergy”); Sunflower Electric Power Corporation (“Sunflower”); NextEra Energy Transmission Southwest, LLC (“NEET Southwest”); Grain Belt Express LLC (“Grain Belt Express”); Kansas Farm Bureau (“KFB”); Kansas Livestock Association (“KLA”); Citizens’ Utility Ratepayer Board (“CURB”); Eastern Kansas Oil & Gas Association (“EKOGA”) and the Kansas Independent Oil & Gas Association (“KIOGA”) (collectively, “EKOGA/KIOGA”) participated in the Workshop and filed comments immediately following the Workshop.

⁴ Staff filed its Proposal and Motion for Modification of the Procedural Schedule on November 4, 2024, after the Workshop. The Commission accepted the filing in its order issued on November 14, 2024.

5. ITC submitted comments immediately following the Workshop and is filing these reply comments in accordance with the Modified Procedural Schedule.

6. ITC appreciates Staff's efforts to incorporate prior feedback into its Proposal, the participation of Intervenors in the Workshop, and the Initial Post-Workshop Comments filed by the Intervenors. Throughout the many rounds of comments, the parties have continued to narrow the issues and have had constructive discussions regarding the appropriate "principles and priorities" to be used in future line siting proceedings. However, further clarifications and improvements to Staff's Proposal are necessary, as explained below.

II. STAFF'S PRINCIPLES AND PRIORITIES, DEFINITIONS, AND CRITERIA

7. ITC supports Staff's shift from a waiver process for line siting criteria and weights. As ITC mentioned previously in its comments, the 120-day statutory timeline would be jeopardized by the addition of a criteria and/or weighting waiver process. Further, previously-filed route studies and testimony in support have provided justification for the criteria used – making such explanations and justification part of future route studies will be consistent with this practice.

8. **Principles and Priorities.** ITC also generally supports Staff's proposal of high-level routing principles that are intended to serve as a guide to route development and can be applied throughout the routing process. Such high-level principles are more helpful than specific criteria and weights as each HVTL will cross unique parcels and face differing balancing requirements. ITC agrees with Grain Belt Express LLC's comment, that routing studies should balance competing interests relevant to specific study areas.⁵

⁵ See, Grain Belt LLC's Post-Workshop Comments to Staff's Kansas Line Siting Principles and Priorities, November 4, 2024, p. 3.

9. For the reasons set forth in its Initial Post-Workshop Comments, ITC continues to recommend elimination of the second principle, which states: “Avoid communication towers and existing wind turbines.”

10. ITC supports NEET Southwest’s recommended edit to Staff’s proposed third principle to read as “minimize crossing through cultivated land and avoid direct impact to center pivot irrigation arms.”

11. ITC proposes the following routing principles, in order of priority:

- Maximize the distance of the transmission line from residences and public facilities.
- Minimize impact to environmental, cultural, and historical sites.
- Align transmission lines parallel or adjacent to parcel boundaries when practicable.
- Minimize crossing through cultivated land and direct impact to center pivot irrigation arms.
- Maintain a reasonable length and reasonable quantity of angles.

12. **Definitions.** ITC continues to recommend refinements and requests clarity in the definitions proposed by Staff in its Strawman Proposal and hereby incorporates its previous comments in relation to such.

13. **Criteria and Weights.** Further, ITC reiterates its previously filed comments regarding Staff’s proposed criteria and weights. ITC continues to recommend that specific weights not be assigned to the criteria proposed by Staff, as mandating specific weights could obstruct the flexibility necessary for an applicant to balance the competing interests of the varied parties who may be impacted by the route of a HVTL and such weighting may create unintended poor results. However, ITC is not opposed to the establishment of a standard list of criteria the Commission expects to see in an applicant’s route study so long as an applicant is able to make modifications to the list with appropriate justification.

14. Subject to ITC’s comments in paragraph 13 above, ITC agrees with NEET Southwest’s proposed modification to the second paragraph of Staff’s Recommendation 2 to read as follows:

“The utility may add criteria to the routing study and weight criteria without Commission approval. However, the utility shall follow routing principles when weighting any additional criteria. Criteria weights which do not follow routing principles may be considered unreasonable.”⁶

ITC notes that in particular, there are criteria that applicants must consider due to state and federal requirements, and applicants should not be required to justify including such legal requirements as criteria in their route study each time an application is filed with the Commission.

II. STAFF’S RECOMMENDATION 3: REQUIRED DOCUMENTATION

15. **Routing Study:** ITC supports formalizing the requirement to file a routing study as part of a siting application and has done so with its previous application filings. Given that filing such a study has been standard practice for Kansas utilities for at least the last 20 years, this should prove to be a smooth transition.

16. **Protocols:** ITC agrees with Evergy’s comments regarding the proposed requirement for an applicant to file documents listed as agricultural impact mitigation protocols, landowner protocols, and oil and gas industry protocols (collectively, “Protocols”). As Evergy stated, and ITC agrees, the inclusion of Protocols are not within the scope of this investigative docket and should be excluded.

17. The Commission filed an order on July 30, 2024, adopting Staff’s Second R&R and ordering that the scope should be consistent with Staff’s recommendations.⁷ The scope of the

⁶ Initial Post-Workshop Comments of NextEra Energy Transmission Southwest, LLC, November 4, 2024, p. 4.

⁷ Order Adopting Staff’s Recommended Scope, July 30, 2024, p. 10.

investigation as proposed in Staff’s Second R&R does not contain any discussion of inclusion of Protocols as part of an applicant’s filings.

18. Further, ITC notes that Staff circulated its Straw Man Proposal on October 31, 2024, less than 24 hours before the Workshop, which was held on November 1, 2024. Intervenors did not have adequate time to consider and comment on the inclusion of Protocols as required filings ahead of the Workshop and before the initial post-Workshop comments filing date of November 4, 2024.

19. ITC agrees with Evergy’s comment that:

“ . . . these documents will only hinder a utility’s ability to effectively negotiate easementsEasement negotiation is a private transaction between landowners and the utility. Standardizing easements and easement negotiations will not only hurt landowners but will also make private negotiations a public transaction.”⁸

As previously stated, ITC prides itself on its history of overwhelmingly positive interactions with interest holders. To date, ITC has not seen the need to formalize its procedure with published protocols and its success rate is evidence of ITC’s fair and transparent communications with landowners and other stakeholders.

20. ITC respectfully requests that any requirement of filing Protocols be removed from future proposals regarding transmission line siting criteria as such requirement is outside of the scope of this investigation.

III. INTERVENOR PROPOSALS OUTSIDE OF INVESTIGATION SCOPE

21. Intervenors Eastern Kansas Oil & Gas Association (“EKOGA”) and Kansas Independent Oil and Gas Association (“KIOGA”) (collectively, “EKOGA/KIOGA”) had not participated in this docket until their late intervention, immediately preceding the November 1,

⁸ Evergy Comments in Response to Staff’s Strawman Proposal, November 4, 2024, p. 4.

2024, technical conference. EKOGA/KIOGA participated in the Workshop and filed comments on November 4, 2024, which ITC addresses here.

22. EKOGA/KIOGA's proposal that oil and gas interest holders be included in the parties who receive notice under K.S.A. § 66-1,179⁹ falls outside of the scope of this docket and would require statutory changes to the above-mentioned code section. In addition, the above-mentioned notice includes provision for publication notice, which serves to provide notice to any parties who may not have received a personalized notice of line siting proceedings. As such, ITC recommends that any proposal to change notice requirements should not be considered here.

23. Regarding EKOGA/KIOGA's recommendations for contents to be included in oil & gas industry protocols, ITC reiterates its comments and statements in the previous section. ITC echoes the comments provided by Sunflower, wherein it stated: "[ITC] in its experience in coordinating with oil & gas operators and mineral interest holders, has not experienced any major difficulties in siting [HVTLs]."¹⁰ Most concerns of oil & gas interest holders related to HVTLs can and should be addressed in individual easement and crossing agreement negotiations, which terms and conditions should not be prescribed by the Commission. Requiring specific terms and conditions on negotiation practices has the potential to limit utilities in their ability to adapt to the unique circumstances and needs of every landowner and parcel of land in Kansas.

24. EKOGA/KIOGA's proposal to require specific payment terms and conditions interferes with private easement negotiations, individual rights to contract, and is outside of the jurisdiction of the KCC. Compensation for an interest in land is first, a private negotiation between

⁹ Post-Workshop Comments from Intervenors, November 4, 2024, pp. 4-6.

¹⁰ Post Workshop Comments of Sunflower Electric Power Corporation in Response to Staff's Report and Recommendation, November 4, 2024, p. 2.

parties and if necessary, later subject to K.S.A. § 26-501, *et. seq.* In either case, easement compensation is outside of the scope of this investigation.

IV. A CRITICAL ELEMENT OF THE SOLUTION IS FOUND IN A KANSAS RIGHT OF FIRST REFUSAL STATUTE.

25. ITC believes that a Kansas Right of First Refusal statute would help ensure that the Commission's ultimate guidance on routing is fully implemented. Incumbent transmission owners have long-standing relationships with local stakeholders and extensive experience developing and operating infrastructure in Kansas that make them uniquely qualified to apply the Commission's guidance. The Commission's direction coupled with a Kansas Right of First Refusal statute will streamline the siting process and promote efficient development of the state's transmission infrastructure.

WHEREFORE, ITC submits these comments for review and consideration and such other relief as the Commission deems just and reasonable.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed, this 22nd day of November, 2024, to all parties of record as listed below:

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