

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

In the Matter of the Joint Application of Mid-Kansas)
Electric Company, LLC, Sunflower Electric Power)
Corporation, Prairie Land Electric Cooperative, Inc.,)
Pioneer Electric Cooperative, Inc., The Victory)
Electric Cooperative Association, Inc., Western) Docket No. 18- MKEE-160-TFR
Cooperative Electric Association, Inc., Wheatland)
Electric Cooperative, Inc. and Southern Pioneer)
Electric Company for Approval of a Local Access)
Tariff and Mid-Kansas and Sunflower Open Access)
Transmission Tariff.)

PREFILED DIRECT TESTIMONY OF

DR. ALA TAMIMI

ON BEHALF OF

JOINT APPLICANTS

October 11, 2017

1 **Q. Please state your name.**

2 A. My name is Ala Tamimi.

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

4 A. I am employed by Sunflower Electric Power Corporation ("Sunflower").

5 **Q. What employment positions have you held at Sunflower and what are your**
6 **overall responsibilities?**

7 A. I am Vice President of Transmission Planning and Policy for both Sunflower and
8 Mid-Kansas Electric Company, LLC ("Mid-Kansas"). To be clear, Mid-Kansas has
9 no employees. Mid-Kansas contracts with Sunflower to provide all services
10 provided by Mid-Kansas

11 **Q. Please describe your educational background and professional experience.**

12 A. I joined Sunflower in 2001 and was promoted to Vice President of Transmission
13 Planning and Policy in 2015. My responsibilities include planning and designing
14 transmission and distribution facilities to meet the needs of the Mid-Kansas,
15 Sunflower and our Members' transmission and distribution systems. This
16 includes planning for service to third-party users. I also focus on transmission
17 and market policy issues that impact our system resources.

18 I hold a master's degree in electrical engineering from Wichita State
19 University and a doctor of philosophy (Ph.D.) degree in electrical engineering
20 from Kansas State University.

21 I am widely published in industry publications including the world's largest
22 technical professional society, The Institute of Electrical and Electronics
23 Engineers ("IEEE"). I am also a senior member of IEEE. I became a licensed

1 professional engineer in June of 2005. I also serve on several Southwest Power
2 Pool ("SPP") working groups and committees, including the Economic Studies
3 Working Group ("ESWG"), Markets and Operations Policy Committee ("MOPC"),
4 Synchrophasor Task Force, Chair for the Generation Interconnection
5 Improvement Task Force ("GIITF") and Chair for the High Priority Incremental
6 Load Study ("HPILs") Task Force.

7 **Q. Have you previously testified before the Commission?**

8 A. Yes. I have provided testimony in Dockets 11-GIME-597-GIE and 17-KPPE-092-
9 COM.

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

11 A. The purpose of my testimony is to support the filing of the Local Access Tariff
12 ("LAT")¹ which will be administered by Sunflower and Mid-Kansas, respectively. I
13 will address the following:

- 14 1. The ownership and physical attributes of the System Owners' Local
15 System.
- 16 2. The service provided by the System Owners' Local System.
- 17 3. An overview of the SPP planning process in conjunction with the System
18 Owners' planning process.
- 19 4. The annual local planning process for the Local System.
- 20 5. The importance of accurate load forecasting in the planning process.

¹ Unless otherwise stated, all capitalized but undefined terms herein will have the same meaning as set forth in the Local Access Tariff.

1 6. LAT provisions that ensure fair and equitable treatment of transmission
2 and sub-transmission customers and owners.

3 **Q. As Vice President of Transmission Planning and Policy, what responsibility**
4 **do you have for the transmission planning and policy at SPP?**

5 A. In the planning area, I am responsible for the planning and distribution
6 engineering departments and ensuring that transmission projects are identified,
7 planned, approved, and implemented in support of our strategic goals.

8 Additionally, I oversee the design of distribution level electrical systems and
9 contribute as needed to the design of transmission level electric systems and
10 ensure proper application of codes, standards, and guidelines to ensure
11 compliance with regulatory requirements.

12 In the policy area, I provide strategic analysis on issues facing the utility industry
13 at the transmission and local levels. I also represent Sunflower and Mid-Kansas
14 at various national, regional, and state organizations and regulatory bodies such
15 as Federal Energy Regulatory Commission ("FERC"), Kansas Corporation
16 Commission ("KCC"), SPP, and North American Energy Reliability Corporation
17 ("NERC"). I and my teams also coordinate with applicable Regional Transmission
18 Organization ("RTO") to carry out studies to support transmission service
19 requests and regional transmission expansion plan development including the
20 development of the overall interconnected network.

21 **Q. As Vice President of Transmission Planning and Policy, what responsibility**
22 **do you have for the planning and policy for the Local System?**

1 A. As mentioned earlier, I manage the distribution engineering department that
2 handles the annual planning assessment for the System Owners' 34.5 kV
3 facilities. I review planning criteria and approve the final report. Also, I am
4 responsible for conducting planning studies on new interconnections to the Local
5 System and the coordination with SPP in the AQ filing process for these new
6 connections as well as modifications to existing delivery points.
7 I work with responsible parties on determining requirements under the local tariff
8 for interconnections to the local system by implementing and working with our
9 System Owners on facilitating that work.

10 **Q. What role or function do you have with planning for service to wholesale**
11 **customers that utilize the Local System for Load Service as provided in the**
12 **proposed LAT?**

13 A. Under Load Service, my role is to make sure the local distribution and
14 transmission systems can provide reliable services to meet local planning and
15 SPP criteria by conducting studies for each new load that interconnects to the
16 system. The studies look at identifying system upgrades and facility design on a
17 rolling year 1, year 5, and year 10 time frames. This provides for system planning
18 in the short and long term. By doing so, the planning process allows for
19 adjustments in the near term should load not materialize as expected, while
20 ensuring that the system meets the customers' needs in the long term. The
21 construction of upgrades and new facilities take time and are not a matter of
22 overnight construction. Plus, this type of planning is a holistic planning process
23 that is more efficient than isolated planning of individual utility projects with no

1 view to the overall system. Holistic planning eliminates duplication of services
2 and wasteful expenditures.

3 **Q. Who administers the LAT for Local Delivery Service?**

4 A. Local Delivery Services on the Local System is administered by Mid-Kansas and
5 Sunflower, as applicable. Mid-Kansas is the administrator for those services on
6 the Local System formerly part of the Aquila, Inc. system ("Mid-Kansas Division")
7 and all other Local System facilities are administered by Sunflower ("Sunflower
8 Division").

9 **Q. Are there currently Local Services offered in the Sunflower Division?**

10 A. The Local Delivery Service is offered, but there is only one wholesale customer.
11 The Kansas Municipal Energy Agency ("KMEA") provides service to the City of
12 Garden City across Wheatland's Local System in the Sunflower Division.
13 Otherwise, all current Local Delivery Service is provided in the Mid-Kansas
14 Division.

15 **Q. What wholesale customers are taking service in the Mid-Kansas Division?**

16 A. The Kansas Electric Power Cooperative, Inc. ("KEPCO"), the Kansas Power
17 Pool, Inc. ("KPP") and KMEA are currently taking Wholesale Local Delivery
18 Service. There are various other municipals that take service as well. The retail
19 customers of the System Owners also take service on the System Owners' Local
20 System. As a general rule, about 60% of the load on the Local System is retail
21 load and the rest is wholesale load. This varies among the System Owners, but
22 generally that is the split among the retail and wholesale customers.

1 **Q. Under the LAT, is SPP Network Integration Transmission Service (“NITS”)**
2 **required in order to take Local Delivery Service?**

3 A. Load Service is only offered in conjunction with SPP NITS. Generation Service is
4 offered (i) in conjunction with SPP NITS or (ii) without SPP NITS at the sole
5 discretion of the System Owners.

6 **Q. Please give an overview of the planning process when a Local Delivery**
7 **Customer initiates new Load Service on the Local System.**

8 A. For new Load Service at the local level, a Local System Impact Study is initially
9 performed to determine if the requested service is likely to trigger upgrades. If
10 upgrades on the Local System are determined to be necessary, then those
11 upgrades are shared with SPP under the SPP Attachment AQ planning process,
12 and then we notify the customer and execute a cost allocation agreement for
13 those costs assigned to the Local Delivery Customer.

14 **Q. Please provide a brief overview of the cost allocation for facilities required**
15 **to provide Load Service.**

16 A. If the Local Facility Study determines the service requires modifications to the
17 Local System, the least cost upgrades and who benefits from those modifications
18 or upgrades are determined. Upgrades that benefit multiple Local Delivery
19 Customers are referred to in the LAT as Local Network Upgrades. For any new
20 or upgraded facilities classified as Local Network Upgrades, the Local Delivery
21 Customer must pay in full the Directly Assigned Network Upgrade Costs prior to
22 commencement of construction. For any new or upgraded facilities that only
23 benefit the Local Delivery Customer, those costs are considered a Direct

1 Assignment Cost and directly assigned to the applicable Local Delivery
2 Customer. The terms of the cost allocation and payment are then documented in
3 the Local Facility Cost Allocation Agreement.

4 **Q. Are you familiar with the current Mid-Kansas and Sunflower OATTs?**

5 A. Yes.

6 **Q. As a general proposition, is the process for service and cost allocation**
7 **under the LAT of any significant difference than under the current Mid-**
8 **Kansas and Sunflower OATTs?**

9 A. No. They are essentially the same. The LAT is much easier to understand and is
10 more user friendly than the current tariff.

11 **Q. Since the approval of the Mid-Kansas and Sunflower OATTs, has the**
12 **planning for transmission and sub-transmission service changed?**

13 A. I would say the service has not changed, but with the ability to uplift what used to
14 be a cost of the local utility to the zone or region, the interest of others in
15 providing the service has changed significantly. The issuance of FERC Order
16 1000 and the openness of FERC to socialize costs across a transmission
17 territory or zone and even to the region has spawned significant interest by
18 independent transmission companies, transmission dependent utilities and
19 municipal agencies to build transmission they may not have considered
20 constructing if they had to pay for all of it themselves. What we are experiencing
21 is customers seeking solutions to needs that exceed the acceptable standard of
22 service in order to qualify the upgrades as transmission and roll the cost up into
23 the SPP revenue requirement to socialize the costs among a broader rate base.

1 **Q. Does the proposed LAT address the current trend?**

2 A. Not totally, but the penalty provisions take a step in the right direction by dis-
3 incentivizing the gaming of the system to shift costs. The current OATT has a
4 penalty section, but the LAT expanded the penalty section to address in part this
5 concern but also to protect the other customers taking Local Delivery Service,
6 specifically the importance of accurate load forecasting. Load forecasting is
7 essential to sound planning. Faulting forecasting can result in inadequate service
8 or wasteful spending. We also intend to bolster the planning process by
9 developing planning criteria and a standard of service. Establishing criteria for
10 local service will level the playing field and provide a fair and open process to
11 evaluate projects and solutions to customers' needs. Because Westar, Inc.
12 ("Westar") is also expressing similar concerns, Mid-Kansas and Sunflower have
13 been working with Westar and others to establish a fair and adequate planning
14 criteria for a major part of the state. By having an open and transparent planning
15 process integrated into the annual planning process as set forth in the LAT, we
16 believe this reduces the potential for abuses by treating all customers fairly and
17 consistently, while still providing reliable service. To be clear, we are not against
18 building transmission. We are against building unnecessary transmission.

19 **Q. Why is it important that there be local planning when designing and**
20 **constructing an integrated transmission and sub-transmission system?**

21 A. You should not plan the transmission and local systems in a vacuum.
22 Independent or sponsored transmission projects built by individual utilities or
23 transmission investors outside a coordinated planning process will result in the

1 least efficient system for the public. Coordinated planning will eliminate
2 duplication of services, unneeded costs, and waste. In a typical coordinated SPP
3 and local planning process, plans to build transmission, which span over ten
4 years, are decided on the assumption no other transmission is being built outside
5 of the planning process. In the event a looped transmission facility is built outside
6 the coordinated planning, the original ten-year plan must be reviewed to make
7 sure the facilities identified are still needed and provide the economic values
8 expected as when they were initially evaluated. However, by allowing
9 transmission or sub-transmission to be built outside of a well-coordinated
10 planning process, the optimal transmission planning resulting from a well-
11 coordinated planning process is no longer as efficient as it was in the original
12 plan and SPP and local transmission owners have to adjust their optimal
13 transmission plan to accommodate the new facilities. The local planning process
14 can play a significant and necessary role in accommodating new local
15 transmission facilities in the SPP coordinated planning process. The local
16 planning can have different criteria (more stringent) than SPP where any needed
17 transmission can be identified per the local planning criteria and can be
18 submitted to SPP to be considered in the SPP coordinated planning process.
19 This will allow SPP and the local utility to reach a final transmission portfolio that
20 is well-coordinated, efficient and will provide for optimal transmission service to
21 all transmission customers not only within the geographical area of the local
22 system, but also across the SPP region.

1 **Q. Based upon your testimony, how important are the planning process**
2 **provisions in the LAT?**

3 A. The planning process is extremely important if we want to provide efficient,
4 reliable service and avoid wasteful spending and duplication of services.
5 Hopefully, all Local Delivery Customers will embrace and participate in the local
6 planning with the System Owners and Mid-Kansas and Sunflower as provided for
7 in the LAT.

8 **Q. Do you support the approval of the LAT?**

9 A. Yes.

10 **Q. Does that conclude your testimony?**

11 A. Yes.

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF Woods)

ALA TAMIMI, being first duly sworn, deposes and says that he is the ALA TAMIMI referred to in the foregoing document entitled "PREFILED DIRECT TESTIMONY OF ALA TAMIMI" before the State Corporation Commission of the State of Kansas and that the statements therein were prepared by him or under his direction and are true and correct to the best of his information, knowledge and belief.

Ala Tamimi
Ala Tamimi

SUBSCRIBED AND SWORN to before me this 17th day of October, 2017.

Chastity Churchill
Notary Public

My Appointment Expires:

