**BEFORE THE KANSAS 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 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. | ) | Docket No. 18-KPPE-343-COC |

# CROSS-ANSWERING TESTIMONY OF

**COREY W. LINVILLE**
**VICE PRESIDENT, POWER SUPPLY AND DELIVERY**
**SUNFLOWER ELECTRIC POWER CORPORATION**

**ON BEHALF OF MID-KANSAS ELECTRIC COMPANY, INC.**

**July 16, 2018**

**Q: Have you reviewed the Direct Testimony of Staff Witnesses Justin Grady and Leo Haynos?**

A: Yes, I have.

Q: **Do you wish to provide cross-answering testimony?**

A: Yes, I will provide cross-answering testimony regarding Mr. Grady's and Mr. Haynos' consideration of the incremental value associated with the Kingman generation if the Kingman Direct Connection project is built.

**Q: You provided direct testimony regarding the value of Kingman generation capacity. Do you agree with the assertion in Mr. Grady's direct testimony that KPP's estimated value of Kingman's capacity over the next 20 years is "reasonable"?[1]**

A: No, I do not. As I point out in my direct testimony, KPP pools all its load and accredited capacity, including the Kingman load and capacity.[2] The total excess capacity which KPP has available to attempt to sell is a function of KPP's total load, total capacity, and the SPP minimum reserve margin. KPP has indicated in its Resource Adequacy Workbook ("RAW") that it only has excess capacity available through 2022. Beginning in 2023 and continuing in each subsequent year, KPP reports a capacity deficit.[3] Despite showing it has the capacity deficit, KPP is asserting that the Kingman Direct Connection project will provide an opportunity to sell 16 MW of capacity from the Kingman generators for the next 20 years. You cannot sell what you do not have. Mr. Grady's acceptance of

[1] Grady Direct, page 17, Line 19.
[2] Linville Direct, page 6, Line 15 through page 7, Line 7.
[3] Linville Direct, Table 1 on page 9.

KPP's estimated value for the excess capacity provided by the Kingman Direct Connection is not consistent with these facts. To be fair, it is difficult to follow KPP's reporting of their capacity position. Their RAW has numerous reporting discrepancies.[4] In addition, Mr. Holloway's reporting of a 59 MW capacity purchase from Westar sourced from the Jeffrey Energy Center ("JEC") is inconsistent. His direct testimony included an exhibit that contained budget information showing the JEC purchase extending through 2027.[5] KPP's RAW shows the purchase expiring in 2022.[6] Mr. Holloway's response to Mid-Kansas DR #28 indicates the purchase does, in fact, expire in 2022,[7] but he did not correct his direct testimony to reflect this fact.

**Q: Do you agree that KPP could derive value from Kingman's generating capacity as a result of the Kingman Direct Connection project during the period prior to 2023 while KPP is projecting a capacity surplus?**

A: No, I do not. As I pointed out in my direct testimony, KPP is already claiming the full 16.4 MW of Kingman capacity in its RAW.[8] This 16.4 MW total contributes to the total pooled capacity that KPP uses in its RAW to determine the amount of excess capacity that they have available to try to sell. In fact, KPP has made a capacity sale from its pooled excess capacity that it could not have made without claiming the Kingman generation capacity. KPP currently has in place a 50 MW capacity sale to OPPD. If Kingman's generation capacity was not included in

[4] Linville Direct, page 9, Line 12 through Table 2 on page 11.
[5] Holloway Direct, Exhibit LWH-1, page 10 of 14, row 1 of the table.
[6] KPP's 2018 RAW, "Purchases and Sales" worksheet, cells L28 – V28, attached hereto as **Exhibit CWL-4**.
[7] KPP's response to Mid-Kansas DR 28, attached hereto as **Exhibit CWL-5**.
[8] KPP's 2018 RAW, "Resource Summary" worksheet, cells Z8 – AJ12, attached hereto at **Exhibit CWL-6**.

KPP's capacity total, KPP would only have 46.9 MW of excess capacity available, making the 50 MW sale to OPPD unworkable.[9] Since KPP is already claiming all the Kingman capacity in its RAW, there is no additional value to be gained.

**Q: Would Kingman have 16 MW of capacity to sell as a standalone entity if KPP did not pool all its capacities and loads?**

A: No, it would not. KPP has 16.4 MW of accredited capacity. KPP has submitted a load forecast as part of its AQ filing with SPP that shows a projected Kingman peak load of 12.8 MW in 2018 and growing at approximately 2% per year until it reaches 15.2 MW in 2027.[10] As a standalone entity, Kingman would have to use its capacity to meet its own load plus minimum reserve requirements. The Table below summarizes how Kingman could use its own capacity to meet its minimum obligations and how much excess would be left to try to sell.

| Year | Kingman Peak Load | Minimum Reserve Requirement (12%) | Kingman Total Capacity Requirement | Kingman Total Capacity | Kingman Excess Capacity |
|---|---|---|---|---|---|
| 2018 | 12.8 | 1.5 | 14.3 | 16.3 | 2.0 |
| 2019 | 13.0 | 1.6 | 14.6 | 16.3 | 1.7 |
| 2020 | 13.3 | 1.6 | 14.9 | 16.3 | 1.4 |
| 2021 | 13.5 | 1.6 | 15.1 | 16.3 | 1.2 |
| 2022 | 13.8 | 1.7 | 15.5 | 16.3 | 0.8 |
| 2023 | 14.1 | 1.7 | 15.8 | 16.3 | 0.5 |
| 2024 | 14.4 | 1.7 | 16.1 | 16.3 | 0.2 |
| 2025 | 14.6 | 1.8 | 16.4 | 16.3 | -0.1 |
| 2026 | 14.9 | 1.8 | 16.7 | 16.3 | -0.4 |
| 2027 | 15.2 | 1.8 | 17.0 | 16.3 | -0.7 |

The Table clearly shows that as a standalone entity Kingman would, at most, have 2 MW of excess capacity to try to sell. That total would drop to nothing by 2025. Since KPP is pooling all its capacity and resources, this exercise is purely

[9] Linville Direct, page 19, line 6 through Tables 3 and 4 on page 20.
[10] See KPP AQ application, attached to the direct testimony of Randall D. Magnison as Exhibit RDM-3.

hypothetical. However, it further illustrates how preposterous Mr. Holloway's assertion is that KPP could derive value from selling 16 MW of Kingman capacity for 20 years if the Kingman Direct Connection project is built.

**Q: In Mr. Haynos' testimony he refers to a 6 MW import/export limitation at Kingman.[11] Do you agree that Kingman has an export limit?**

A: No, I do not. Mr. Haynos cites paragraph 2 of KPP's application when he references the export limit in his testimony.[12] However, paragraph 2 of KPP's application only references a 6 MW import limit.[13] There is no mention of an export limit. This distinction is important as it relates to KPP's ability to utilize the capacity from Kingman's generators. As I discuss in my direct testimony, there is no export limit associated with the existing transmission service to Kingman.[14] This has allowed KPP to get full SPP NITS service for 16.5 MW[15] of Kingman's generation,[16] fully utilize all 16.4 MW of Kingman's accredited capacity, report this capacity in its entirety in their RAW, and use this capacity to effectuate capacity sales to outside entities such as the sale currently in place with OPPD. The diagrams below further illustrate how Kingman's 6 MW import limit does not equate to a 6 MW export limit. **Diagram 1** below shows power flow when Kingman is at a full load condition of 12 MW, operating at its 6 MW import

[11] See Haynos direct testimony, page 5, Lines 1-2.
[12] See Haynos direct testimony, footnote 3.
[13] See KPP Application for Certificate of Convenience and Authority, paragraph 2.
[14] See Linville direct testimony, page 15, Lines10 – 20.
[15] KPP has 16.5 MW of transmission service associated with the Kingman generators identified in their SPP NITSA. This total is greater than their current accredited capacity from the Kingman generators, but that is not uncommon as accredited capacity can have minor variations from year to year due to the ongoing SPP capability testing requirements.
[16] See Appendix 1 to Attachment 1 of the Service Agreement for Network Integration Transmission Service between Southwest Power Pool, Inc. and Kansas Power Pool dated April 1, 2018, attached hereto as **Exhibit CWL-7**.

limit, and generating 6 MW to meet the remainder of its load requirements. Factoring in line losses and the load at Cunningham, the diagram illustrates how the 6 MW import limit is required to avoid exceeding the 10.5 MW limit at the Pratt feeder.

**DIAGRAM 1**

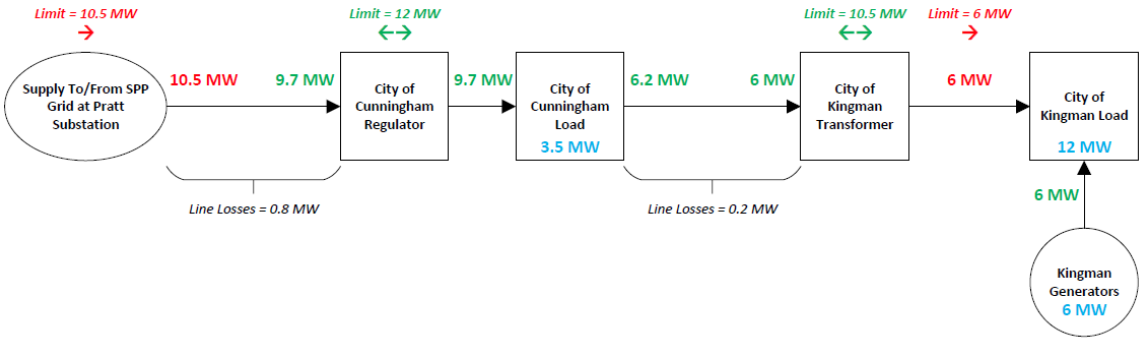



**Diagram 2** below shows power flow under conditions that SPP studies when granting network service to resources that have been designated as Network Resources by a Transmission Customer. SPP completes these studies under full load conditions. The 12 MW load at Kingman absorbs 12 MW of the 16.4 MW generated by the Kingman resources, leaving line flows well within limits. This clearly illustrates why KPP has been granted full SPP network service for all the Kingman generation which allows KPP to claim all the capacity from the Kingman generation as Firm Capacity in their RAW.

**DIAGRAM 2**

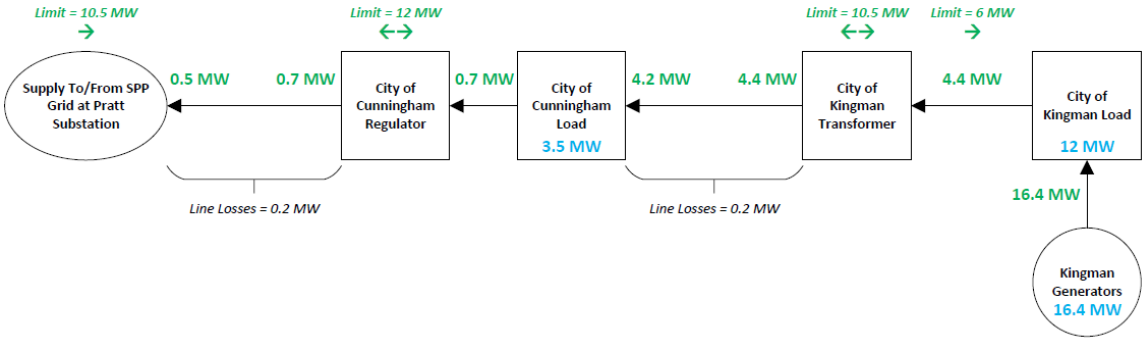
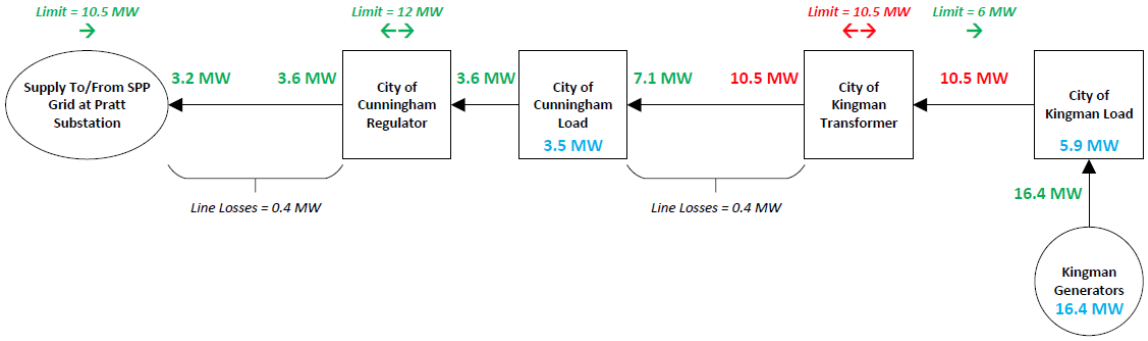



**Diagram 3** below shows that under certain operating conditions the transformer owned by the City of Kingman would be the most limiting element if the Kingman generators were called on to generate for energy in excess of Kingman's load by the SPP Integrated Marketplace (IM). As I will discuss later in my testimony, this operating scenario is highly unlikely due to the economics of the market, but the scenario illustrates that Kingman's most limiting element is its own transformer. Mr. Holloway confirms this in his response to Mid-Kansas DR 31.[17]

**DIAGRAM 3**




**Q: In your previous answer you used the terms capacity and energy when referring to Kingman's generation. Mr. Haynos' testimony seems to focus on**

[17] KPP Response to Mid-Kansas DR 31, part a, attached hereto as **Exhibit CWL-8**.

**the value of energy produced by Kingman's generation.[18] Can you elaborate on the difference between energy and capacity?**

A: Yes. As discussed in my direct testimony, capacity is the maximum amount of capacity that a generator can provide under prescribed operating conditions, and energy is the actual output of the generator at any given time.[19] Generator owners can derive value from both capacity and energy. Capacity is used to meet minimum capacity requirements as described in my direct testimony.[20] Excess capacity above minimum requirements can be sold via bilateral agreements. Energy can be sold in the SPP IM, and profits from market energy sales are based on the production costs of the generator compared to the market price of energy.

**Q: What type of transmission service is required to sell capacity?**

A: Capacity is typically associated with deliverability from the resource to a load. The scenario described under Diagram 2 in my earlier testimony shows how SPP grants network transmission service at the SPP level to deliver all of Kingman's generation capacity to KPP's load. Because Kingman's generation is connected to the 34.5 kV system owned by Southern Pioneer, there is a second level of sub-transmission service required to deliver capacity from Kingman's generators to KPP's load. KPP has a local Network Integration Transmission Service Agreement which grants this service.[21] Network service, at both the SPP level and the local 34.5 kV level, makes the Kingman generation capacity firm, allowing

[18] Haynos Direct, page 6, Lines 8-11.
[19] Linville Direct, page 5, Lines 4-8.
[20] Linville Direct, page 5, Line 16 through page 6, Line 3.
[21] See Service Agreement for Network Integration Transmission Service between the Kansas Power Pool and Mid-Kansas Electric Company, LLC dated January 11, 2012, attached to the direct testimony of Randall D. Magnison as Exhibit RDM-1.

KPP to use all of Kingman's accredited capacity to meet its minimum capacity requirements. As described in my direct testimony, KPP has full deliverability from the Kingman generators to its load on the 34.5 kV system with no additional LADS charges beyond the LADS charges associated with load service required because the KPP load on the 34.5 kV system exceeds the capacity of the Kingman generation.[22] KPP pays for its use of the 34.5 kV system through the LADS charge it pays for service to its load. If KPP were to sell capacity directly from a Kingman generator to a third party with a load not connected to the 34.5 kV system, that third party would be assessed a LADS charge to utilize first mile service on the 34.5 kV system to get the load from the Kingman resource to its remote load. As described in my direct testimony, KPP can and is utilizing all of Kingman's accredited capacity to contribute to the total socialized excess capacity that KPP has available to sell.[23] Because of the socialization strategy being employed, KPP does not have to source capacity sales from the Kingman generators in order to derive value from the Kingman capacity. Mr. Holloway has confirmed that there are other KPP generation resources better suited to source capacity transactions from.[24] The current capacity sale to OPPD illustrates how KPP has used all 16.4 MW of Kingman's accredited capacity total to contribute to 63.3 MW of KPP excess capacity from which KPP has effectuated a 50 MW capacity sale sourced from the Dogwood resource.[25]

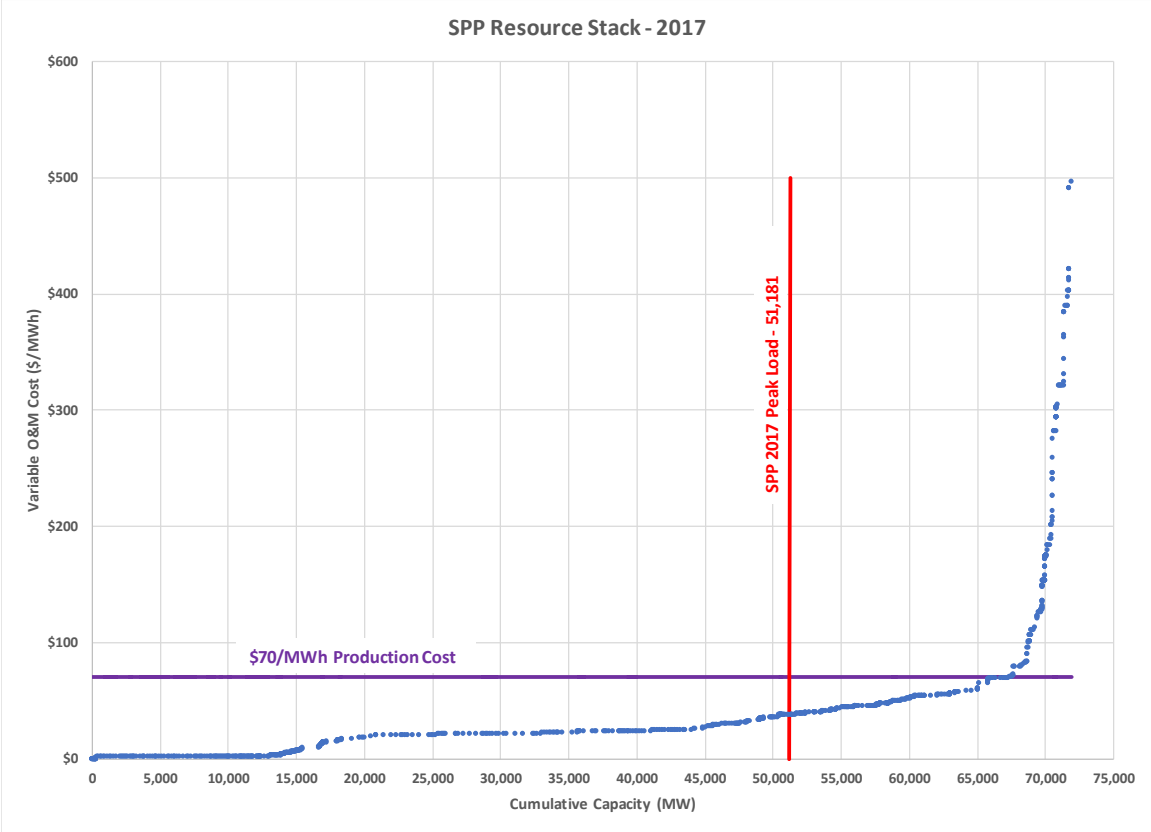
**Q: You've established that KPP is already deriving maximum benefit from the**

[22] Linville Direct, page 14, Lines 1 – 21.
[23] Linville Direct, page 19, Line 8 through Tables 3 and 4 on page 20.
[24] Linville Direct, page 21, Lines 4-5.
[25] Linville Direct, Tables 3 and 4 on page 20.

**Kingman capacity with no opportunity to derive incremental value. In his direct testimony Mr. Haynos refers to the expanded capacity of electric transmission provided by the KDC allowing Kingman to export available energy from the Kingman generators when requested by the SPP IM[26] and fully use the generation fleet as an economic resource.[27] Is there an opportunity to derive additional value from the Kingman generation through the sale of energy in the SPP?**

A: As discussed earlier in my testimony, Kingman's ability to fully utilize its generation to sell energy is currently limited by its own transformer. However, the idea that Kingman's resources are ever going to provide a benefit as an "economic resource" in the SPP IM is a fantasy. As discussed in my direct testimony, during the hour with the highest market price at the Kingman generator node in all of 2017, Kingman would have lost $9.23/MWh for the energy it sold into the market.[28] As noted by Mr. Holloway, Kingman's generators have a very high production cost of $70/ MWh.[29] These generators are competing against a huge fleet of cheaper priced resources in the SPP IM. The graph below shows the relative position of the Kingman generators based on production costs compared to all the other resources in SPP.[30] Each dot on the graph represents one of the 1,104 generators that comprise the 71,899 MW of summer capacity reported in SPP in 2017.

[26] Haynos Direct, page 5, Lines 8-11.
[27] Haynos Direct, page 12, Lines 5-8.
[28] Linville Direct, page 21, Lines 9-18.
[29] Holloway Direct, Exhibit LWH-3, page 13.
[30] Data from S&P Global Market Intelligence (snl.com).




The graph shows that there are resources with a cumulative capacity of approximately 67,500 MW that have production costs below Kingman's $70/MWh cost in SPP. The peak load in SPP in 2017 was 51,181 MW.[31] That means that based on a purely economic dispatch of resources in SPP, the Kingman generators would not be in mix at SPP's full load. In fact, there would be over 16,000 MW of capacity from resources that are cheaper than Kingman but still not dispatched to meet SPP's peak load under a purely economic dispatch scenario. Another way to look at this is to identify the production cost of the last resource required to serve the 51,181 MW of annual peak load in SPP. That cost is $38.16/MWh, meaning that at a production cost of $70.00/MWh the Kingman

[31] Data from SPP State of the Market 2017 report, page 3, https://www.spp.org/documents/57928/spp_mmu_asom_2017.pdf.

generators would be approximately $32.00/MWh out of the money under peak conditions in a purely economic dispatch scenario. All of this information leads to the obvious conclusion that Kingman's generators are not currently economic resources, and they have a very long way to go if they are ever to become economic resources.

**Q: Do you see any incremental value whatsoever that KPP or Kingman can derive from the Kingman generators, through either additional capacity or energy sales, if the Kingman Direct Connection project is built?**

A: No, I do not.

**Q: Does this conclude your testimony?**

A: Yes.

Exhibit CWL-4

| Transaction Information | | | Transaction Capacity Values (MW) | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Purchase or Sale | Transaction Type | From or To Entity | Contracted Capacity | Amount of Accredited Capacity | | | | | | | | | |
| | | | | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 |
| Purchase | Firm Capacity | Westar Energy - LRE | 59.0 | 59.0 | 59.0 | 59.0 | 59.0 | 59.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

EXHIBIT CWL-5

KANSAS POWER POOL RESPONSE TO MID-KANSAS ELECTRIC COMPANY, INC.
INFORMATION REQUEST #28

| | |
|---|---|
| Company Name | Kansas Power Pool |
| Docket Number | 18-KPPE-343-COC |
| Request Date | June 22, 2018 |
| Response Date | June 29, 2018 |

**Please Provide the Following:**
Has KPP extended its JEC contract beyond 2022? If so, for how may MW and to what date?

**Response:**

No.

| | |
|---|---|
| Submitted By: | Kansas Power Pool |
| Submitted To: | Mid-Kansas Electric Company, Inc. |

EXHIBIT CWL-5

**Verification of Response**

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to Mid-Kansas Electric Company, Inc. any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: _____

Date: June 29, 2018

**Exhibit CWL-6**

| Resource Identification | | | | Firm Capacity - Summer | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| NERC Unit ID | Plant Code | Generator ID - 1 | Generator ID - 2 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 |
| | 1296 | 4 | King4 | 3.3 | 3.3 | 3.3 | 3.3 | 3.3 | 3.3 | 3.3 | 3.3 | 3.3 | 3.3 | 3.3 |
| | 1296 | 6 | King6 | 2.3 | 2.3 | 2.3 | 2.3 | 2.3 | 2.3 | 2.3 | 2.3 | 2.3 | 2.3 | 2.3 |
| | 1296 | 7 | King7 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 |
| | 1296 | 8 | King8 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 |
| | 1296 | 9 | King9 | 6.0 | 6.0 | 6.0 | 6.0 | 6.0 | 6.0 | 6.0 | 6.0 | 6.0 | 6.0 | 6.0 |

# Appendix 1

**Network Resources of**

*Kansas Power Pool*

**APPENDIX 1: KANSAS POWER POOL NETWORK RESOURCES**

| | Maximum Net Dependable Capacity | | | |
|---|---|---|---|---|
| Network Resource | Summer | Winter | Location | Comments |
| Kingman Gen KING4 | 2 | 2 | Kingman County, KS | Term of service:7/1/2017 to 7/1/2027 AREF:84831373 |
| Kingman Gen KING7 | 2.2 | 2.2 | Kingman County, KS | Term of service:7/1/2017 to 7/1/2027 AREF:84831374 |
| Kingman Gen KING6 | 3.5 | 3.5 | Kingman County, KS | |
| Kingman Gen KING8 | 2.5 | 2.5 | Kingman County, KS | |
| Kingman Gen KING9 | 6.3 | 6.3 | Kingman County, KS | |
| AugN1 | 3.8 | 3.8 | Butler Co., KS | |
| AugN2 | 3.8 | 3.8 | Butler Co., KS | |
| AugN3 | 5.7 | 5.7 | Butler Co., KS | |
| AugN4 | 6.7 | 6.7 | Butler Co., KS | |
| Bur1A | 2.3 | 2.3 | Coffey Co, KS | |
| Bur4A | 3 | 3 | Coffey Co, KS | |
| Bur6 | 4.8 | 4.8 | Coffey Co, KS | |
| ClayD1 | 0.9 | .0.9 | Clay Co., KS | Effective 1/1/2012 |
| ClayD2 | 2.1 | 2.1 | Clay Co., KS | |
| ClayD3 | 5.1 | 5.1 | Clay Co., KS | |
| ClayD4 | 3.5 | 3.5 | Clay Co., KS | |
| ClayD5 | 3.5 | 3.5 | Clay Co., KS | |
| ClayD6 | 6.7 | 6.7 | Clay Co., KS | |
| Elw1 | 1.7 | 1.7 | Barton Co., KS | |

| | | | | |
|---|---|---|---|---|
| Elw2 | 1.3 | 1.3 | Barton Co., KS | Term of service: 7/1/2017 to 7/1/2027<br>AREF: 84831375 |
| MinD3 | 1.1 | 1.1 | Ottawa Co., KS | Term of service:7/1/2017 to 7/1/2027<br>AREF:84831377 |
| MinD5 | 2 | 2 | Ottawa Co., KS | Term of service:7/1/2017 to 7/1/2027<br>AREF:84831376 |
| MinD6 | 3 | 3 | Ottawa Co., KS | |
| Mul9 & Mul10 | 8.2 | 8.2 | Sumner CO, Kansas | Term of service: 9/1/2014 to 9/1/2024<br>OASIS ID: 79984962 |
| WellGT | 21.5 | 21.5 | Nemaha Co., KS | |
| WellST | 20 | 20 | Sumner Co., KS | |
| WinfGT | 10.3 | 10.3 | Cowley Co., KS | Effective 1/1/2013 |
| WinfST | 26.7 | 26.7 | Cowley Co., KS | |
| Dogwood | 0/15/40 | 0/15/40 | Cass, MO | Term of service: 6/1/2014 to 6/1/2024<br>OASIS ID: 74234218<br>0 MW 6/1/2017 to 6/1/2019<br>15 MW 6/1/2019 to 6/1/2022<br>40 MW 6/1/2022 to 6/1/2024 |
| Dogwood | 12/22 | 12/22 | Cass, MO | Term of service: 3/1/2016 to 3/1/2037<br>OASIS ID: 82225806<br>12 MW 6/1/2017 to 6/1/2019<br>22MW 6/1/2019 to 3/1/2037 |
| Grand River Dam Authority Purchase | 15.3 | 15.3 | Mayes Co., OK | Term of service: 4/1/2011 to 6/1/2026<br>OASIS IDs: 75402384, 75402413, & 75402421 |
| Greensburg Wind | 0 | 0 | Kiowa Co., KS | Firm Transmission for 12.5MW<br>Term of service:<br>OASIS IDs: 75402446, 75402448, & 75402460 |
| Displacement Agreement between Municipal Energy Agency of Nebraska and Western Area Power Administration comprising of generation from Ansley for 1.5MW, Benkelman 0.8MW, Broken Bow 7.3MW, Burwell 3.3MW, Callaway 1MW, Crete 6.1MW, Curtis 3.1MW, Oxford 3.7MW, Pender 4.4MW, Red Cloud 4.4MW, Sargent 2.3MW, Stuart 1.8MW, West Point 4MW, and Fairbury 16MW | 0.2 | 0.2 | | Term of Service: 7/1/2017 to 7/1/2027<br>OASIS ID: 84831370 |

| | | | | |
|---|---|---|---|---|
| Displacement Agreement between Municipal Energy Agency of Nebraska and Western Area Power Administration comprising of generation from Ansley for 1.5MW, Benkelman 0.8MW, Broken Bow 7.3MW, Burwell 3.3MW, Callaway 1MW, Crete 6.1MW, Curtis 3.1MW, Oxford 3.7MW, Pender 4.4MW, Red Cloud 4.4MW, Sargent 2.3MW, Stuart 1.8MW, West Point 4MW, and Fairbury 16MW | 2.8 | 2.8 | | Term of Service: 4/1/2011 to 4/1/2021<br>OASIS IDs: 75402711, 75402731, & 75402737 |
| Power Sales Contract between Southwestern Power Administration and Kansas Municipal Energy Agency | 5.1 | 5.1 | | Term of service: 4/1/2011 to 4/1/2021<br>OASIS IDs: 75402126, 75402128, & 75402129 |
| Westar Energy Coal Purchase - Jeffrey Energy Center 1, 2, 3 | 50 MW beginning 4/1/2011 and increasing to 59MW beginning 1/1/2012 | 59 | Potowatomie Co., KS. | Term of service: 1/1/2012 to 4/1/2022<br>OASIS IDs: 75406648, 75406653, & 75406660 |
| Southwestern Power Administration Purchase | 0.3 | 0.3 | Various | Term of service: 9/1/2014 to 9/1/2024<br>OASIS ID: 79984967 |
| Marshall Wind | 0.75 | 0.75 | Marshall Co., KS | Firm Transmission for 25 MW<br>Term of Service: 4/1/2016 to 4/1/2037<br>OASIS ID: 80716676 |

EXHIBIT CWL-8

KANSAS POWER POOL RESPONSE TO MID-KANSAS ELECTRIC COMPANY, INC.
INFORMATION REQUEST #31

| | |
|---|---|
| Company Name | Kansas Power Pool |
| Docket Number | 18-KPPE-343-COC |
| Request Date | June 29, 2018 |
| Response Date | July 12, 2018 |

**Please Provide the Following:**

A. Does the current configuration of the Kingman city substation allow for export of all 16 MW of Kingman generation?

B. What is (are) the transformer rating(s) of the transformer(s) between the city generation and the Kingman 34.5 kV line?

C. Please supply a one-line diagram with maximum, normal and emergency MVa ratings of the facilities on the one-line diagram.

**Response:**

a. The current configuration does not allow for the export of all 16 MW of generation. The transformer is limited to 10.5MVA. Therefore, the max export would be 10.5MVA plus the Kingman Load. For example, if the Kingman load was 6MW, and all 16 MW of generation was online, 10 MW would be exported.

b. See attachment "Kingman Sub Oneline.pdf"

c. See attachment "Kingman Sub Oneline.pdf"

| | |
|---|---|
| Submitted By: | Kansas Power Pool |
| Submitted To: | Mid-Kansas Electric Company, Inc. |

**VERIFICATION**

STATE OF KANSAS )
) ss:
COUNTY OF Ellis )

COREY W. LINVILLE, being first duly sworn, deposes and says that he is the COREY W. LINVILLE referred to in the foregoing document entitled "CROSS-ANSWERING TESTIMONY" 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.

Corey W. Linville

**SUBSCRIBED AND SWORN** to before me this 16th day of July, 2018.

NOTARY PUBLIC - State of Kansas
Renee K. Braun
My Appt. Expires 4/30/2022

Notary Public

My Appointment Expires: