

**BEFORE THE STATE 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    ) Docket No. 18-KPPE-343-COC  
Service Territory of Southern Pioneer Electric Company   )  
and Ninnescah Rural Electric Company.                    )

**KANSAS POWER POOL'S MOTION TO COMPEL**

COMES NOW The Kansas Power Pool (KPP) and requests the Commission issue an order compelling Mid-Kansas Electric Company (MKEC) to respond to discovery requests served upon it by KPP. KPP states the following in support of its motion:

1. On June 20, 2018, MKEC responded to discovery request No. 12 from Commission Staff, in which MKEC admitted that MKEC includes the 115kV radial transmission line purchased from Ninnescah Cooperative in MKEC's transmission based formula based rates and also admitted that 100% of this cost is paid for by MKEC transmission customers.<sup>1</sup>

2. On June 27, 2018, MKEC responded to discovery request No 16 from Commission Staff, in which MKEC claimed Southern Pioneer Electric Company (Southern Pioneer) pays a disproportionate share of the costs associated with the revenue requirement for the purchase price of the Ninnescah line. MKEC stated that MKEC Members currently use 5.49% of the transmission capacity of the Ninnescah line, but these Members are assigned 65.35% of the total cost through the SPP's zonal transmission cost allocation policy.<sup>2</sup>

3. On July 3, 2018, KPP issued discovery requests No. 13-30 to MKEC, seeking information regarding how MKEC treats the other radial transmission lines it operates, including

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<sup>1</sup> See MKEC Response to Staff DR #12, Exhibit 1.

<sup>2</sup> See MKEC Response to Staff DR #16, Exhibit 2.

whether those lines are included in MKEC's transmission formula rates and how the costs of those lines are apportioned amongst MKEC's customers. On July 10, 2018, MKEC objected to all of these requests, solely on the basis of relevancy.<sup>3</sup>

4. On July 9, 2018, MKEC and Southern Pioneer filed direct testimony from Randall Magnison, in which Mr. Magnison testified "The Mid-Kansas Members are paying for approximately 65% of the Ninnescah Transmission Line costs even though those Members' retail load is less than 6% of the transmission line."<sup>4</sup>

5. Mr. Magnison also filed direct testimony, and Southern Pioneer and MKEC's witness H. Davis Rooney filed direct and cross-answering testimony, in which they both speculate about potential negative consequences if KPP were required, at some unknown point in the future, to place the Kingman Direct Connection under the SPP OATT.<sup>5</sup>

6. On Wednesday July 11, 2018, counsel for KPP communicated by email and telephone with counsel for MKEC, explaining why KPP believes the information sought in discovery requests No. 13-30 to MKEC is relevant to this proceeding, particularly in light of the testimony filed by Southern Pioneer and MKEC in this matter. MKEC declined to reconsider its objection or provide the requested information.

7. MKEC's relevancy objection to KPP's discovery requests is unwarranted, because these requests clearly fall within the bounds of discovery commonly allowed by the Commission.

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<sup>3</sup> KPP Data Requests No. 13-30 to MKEC, and MKEC objections to the same, Exhibit 3.

<sup>4</sup> Randall Magnison Direct Testimony, page 30, lines 8-10.

<sup>5</sup> Randall Magnison direct testimony, page 33, line 18 through page 36, line 2; H. Davis Rooney direct testimony, page 31, line 6 through page 40, line 4; Exhibit HDR-9 & HDR-10; & H. Davis Rooney cross-answering testimony, page 2, lines 14-18; page 17, lines 5-11.

The Commission has recognized that, while the term “clearly relevant” is not defined in the Commission’s regulation, the Kansas Supreme Court has found:

...scope of discovery is to be liberally construed so as to provide parties with information essential to litigation in order to insure the parties a fair trial. The scope of relevancy in a discovery proceeding is broader than the scope of relevancy at trial. Relevancy includes information which may be useful in preparation for trial. A request for discovery would be considered relevant if there is any possibility that the information sought may be relevant to the subject matter of the lawsuit.<sup>6</sup>

8. Here, the information sought in discovery requests No. 13-30 to MKEC is relevant to the claims raised in the pre-filed testimony of Southern Pioneer and MKEC, because it provides a context to their complaints about potential inclusion of the costs of the Kingman Direct Connection in the SPP OATT. As noted in Leo Haynos’s cross-answering testimony, while Southern Pioneer and MKEC complain that KPP may be required to “socialize” the costs of the Kingman Direct Connection, if KPP is required to place the Kingman Direct Connection in the SPP OATT at some point in the future, MKEC itself benefits from such “socialization” of costs of the 115 kV radial line supplying Southern Pioneer’s Semcrude station.<sup>7</sup> Certainly, if MKEC is benefiting from the “socialization” of the costs of other radial lines, including the ones at issue in KPP’s discovery requests No. 13-30, that information is relevant to the testimony offered and claims made by Southern Pioneer and MKEC in this matter. Southern Pioneer and MKEC have opened the door to further investigation of the issues addressed in these discovery requests by their pre-filed testimony.

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<sup>6</sup> *In the Matter of the Application of the Victory Electric Cooperative Association, Inc., Seeking Commission Approval to Update Its Local Access Delivery Service Tariff Pursuant to the 34.5 kV Formula Based Rate Plan Approved in Docket No. 16-MKEE-023-TAR*, Order on Motion to Compel and Motion to Limit, p. 8, n. 43(quoted *In re Pennington*, 224 Kan. 573, 576-7, 581 P.2d 812 (1978), Cert. denied – U.S. –, 99 S.Ct. 1265, 59 L.Ed.2d 485 (1979) and also citing *Fields v. Stauffer Publications, Inc.*, 2 Kan.App.2d 323, 326, 578 P.2d 1138 (1978)). (K.C.C. August 18, 2016).

<sup>7</sup> Cross-Answering Testimony of Leo Haynos, page 10, lines 6-16.

9. In the alternative, KPP has filed a motion to strike portions of Southern Pioneer and MKEC's pre-filed testimony, including the testimony which makes the information sought in these discovery requests relevant. This testimony includes:

- Randall Magnison direct testimony, page 33, line 18 through page 36, line 2;
- H. Davis Rooney direct testimony, page 31, line 6 through page 40, line 4; Exhibit HDR-9 & HDR-10;
- H. Davis Rooney cross-answering testimony, page 2, lines 14-18; page 17, lines 5-11.

If KPP's motion to strike this testimony is granted, and this testimony and Southern Pioneer and MKEC's claims regarding potential placement of the Kingman Direct Connection under the SPP OATT is disregarded and excluded from the hearing in this matter, then KPP will agree to withdraw its discovery requests No. 13-30 and this motion to compel responses to those requests.

WHEREFORE, for the reasons stated above, KPP respectfully requests the Commission overrule MKEC's objection to KPP's discovery requests No. 13-30 and issue an order compelling MKEC to respond to these requests, and for such other and further relief as the Commission deems just and reasonable.

Respectfully submitted:

By: /s/ Amy Fellows Cline

Timothy E. McKee, #7135

Amy Fellows Cline, #19995

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*Attorneys for the Kansas Power Pool*

VERIFICATION

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF SEDGWICK    )

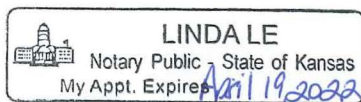
Amy Fellows Cline, of lawful age, being first duly sworn upon my oath, state that I am one of the attorneys for the Kansas Power Pool; that I have read the above Motion; that I know the contents thereof and declare that the statements made therein are true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Amy Fellows Cline

SUBSCRIBED AND SWORN to before me this 17<sup>th</sup> day of July, 2018.

  
\_\_\_\_\_  
Notary Public

My Appointment Expires:



### **CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of July, 2018, Kansas Power Pool's Motion to Compel was served via electronic mail to:

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/s/ Amy Fellows Cline

Amy Fellows Cline, #19995

*Attorneys for Kansas Power Pool*

**Kansas Corporation Commission**  
Information Request

Request No: 12

Company Name                      MID-KANSAS ELECTRIC COMPANY, INC.                      MKEE

Docket Number                      18-KPPE-343-COC

Request Date:                      June 19, 2018

Date Information Needed    June 28, 2018

RE:    SPP status of the 115kV radial Ninnescah transmission line

**Please Provide the Following:**

- A. Does Mid-Kansas include the 115kV radial transmission line purchased from Ninnescah Cooperative in its transmission formula based rates?

**Response: Yes.**

- B. If yes, what percentage of the revenue requirement for that asset is paid for by Mid-Kansas customers?

**Response: 100% of the cost is paid for by Mid-Kansas transmission customers. The project is a zonal facility and does not receive any regional funding.**

Submitted By                      Leo Haynos

Submitted To                      Al Tamimi

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and Answer(s) thereto and find the 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 the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

  
James Brungardt

Date: 6/20/2018

Exhibit  
1



**Kansas Corporation Commission**  
Information Request

Request No: 16

Company Name                      MID-KANSAS ELECTRIC COMPANY, LLC                      MKEE

Docket Number                      18-KPPE-343-COC

Request Date:                      June 25, 2018

Date Information Needed                      July 5, 2018

RE:      Followup to Staff DR 12

**Please Provide the Following:**

- A. Because Southern Pioneer is one of two customers at the end of the 115kV radial transmission line, does Southern Pioneer pay a disproportionate share of the costs associated with the revenue requirement for the purchase price of the Ninnescah line?

**Response:**

**Yes. Southern Pioneer receives transmission service through Mid-Kansas. The table below shows the Mid-Kansas Members make up 65.35% of the Mid-Kansas zonal transmission load. Zonal transmission costs are billed on an annual average load ratio share basis. Mid-Kansas Members currently use 5.49% of the transmission capacity of the Ninnescah line, but Mid-Kansas Members are assigned 65.35% of the total cost through the SPP's zonal transmission cost allocation policy. If KPP were to connect Kingman to the Ninnescah line, KPP usage would be about 45% and Mid-Kansas Members usage would drop to 2.98%, while the Mid-Kansas Members would still pay 65.35% of the zonal cost.**

See attached Excel/PDF file "LRS\_Ninnescah\_Line\_KCC\_DR\_16" for more detail on the usage load ratio share comparisons.

Mid-Kansas Transmission Zone Load Ratio Shares		
<u>Customer</u>	<u>Annual Average (kW)</u>	<u>LRS</u>
Mid-Kansas Members	338,031.9	65.35%
KEPCo	99,402.0	19.22%
KMEA	63,926.3	12.36%
KPP	13,938.0	2.69%
Westar	557.2	0.11%
Sunflower	1,419.4	0.27%
	517,274.8	100.00%

Exhibit  
2

B. Please explain how the revenue requirement for this asset is calculated for Southern Pioneer and for Ninnescah Cooperative.

**Response:**

The revenue requirement for the Ninnescah line is calculated per the terms set forth in the "Order Approving Unanimous Settlement Agreement" in Docket 14-MKEE-170-TAR. The revenue requirement is then included as part of Mid-Kansas' zonal revenue requirement calculated in its annual transmission formula rate. The total zonal revenue requirement is then recovered from Mid-Kansas zonal transmission customers on a prior year average transmission load ratio share. Below is a table showing the load ratio shares for each of Mid-Kansas' zonal transmission customers. Southern Pioneer's load ratio share (22.52%) is included in the total for the Mid-Kansas Members. Ninnescah Cooperative is a member of, and receives transmission service through, KEPCo. Mid-Kansas is not privy to KEPCo's allocations to its members for KEPCo's share of zonal costs for Mid-Kansas transmission service. Mid-Kansas can only assume that KEPCo assigns Ninnescah some portion, perhaps on a load ratio share basis.

Mid-Kansas Transmission Zone Load Ratio Shares		
<u>Customer</u>	<u>Annual Average (kW)</u>	<u>LRS</u>
Mid-Kansas Members	338,031.9	65.35%
KEPCo	99,402.0	19.22%
KMEA	63,926.3	12.36%
KPP	13,938.0	2.69%
Westar	557.2	0.11%
Sunflower	1,419.4	0.27%
	517,274.8	100.00%

Submitted By            Leo Haynos

Submitted To            Al Tamimi

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**Verification of Response**

I have read the foregoing Information Request and Answer(s) thereto and find the 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 the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

  
James Brungardt

Date: 6/27/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 13  
Date of Request: July 3, 2018

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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. )

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Docket No. 18-KPPE-343-COC

RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 138 kV radial line from Harper to the 138kV/34.5 kV substation north of Rago, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

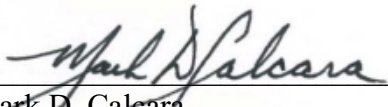
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:   
Mark D. Calcara

Date: 7/10/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 14

Date of Request: July 3, 2018

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

RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to the Manning Substation, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

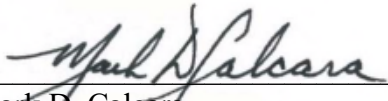
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **Verification of Response**

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Signed:   
Mark D. Calcara

Date: 7/10/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 15  
Date of Request: July 3, 2018

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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. )

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Docket No. 18-KPPE-343-COC

RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to Beaver Valley Substation, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

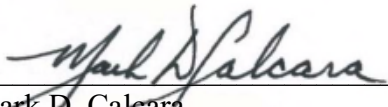
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

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### **Verification of Response**

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Signed:   
Mark D. Calcara

Date: 7/10/2018



**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 16  
Date of Request: July 3, 2018

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
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RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to the City of Oberlin, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

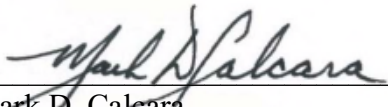
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SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

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### **Verification of Response**

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Signed:   
Mark D. Calcara

Date: 7/10/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 17  
Date of Request: July 3, 2018

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
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RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to the City of Atwood, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

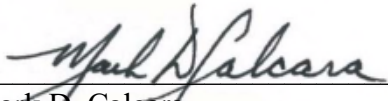
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SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

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Signed:   
Mark D. Calcara

Date: 7/10/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 18  
Date of Request: July 3, 2018

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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.

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) ) Docket No. 18-KPPE-343-COC  
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RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to the Bemis Substation, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

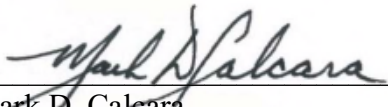
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:   
Mark D. Calcara

Date: 7/10/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 19

Date of Request: July 3, 2018

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

RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to the City of Goodland, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

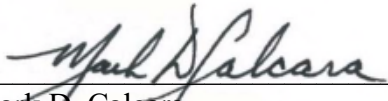
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:   
Mark D. Calcara

Date: 7/10/2018



**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 20  
Date of Request: July 3, 2018

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
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RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to the Ogallah Substation, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

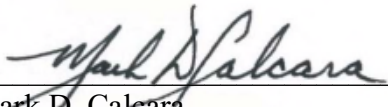
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:   
Mark D. Calcara

Date: 7/10/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 21  
Date of Request: July 3, 2018

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
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RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to the Ellsworth Substation, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

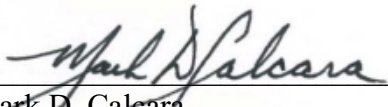
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:   
Mark D. Calcara

Date: 7/10/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 22

Date of Request: July 3, 2018

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

RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to the Alexander Substation, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

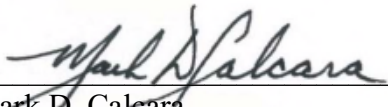
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:   
Mark D. Calcara

Date: 7/10/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 23  
Date of Request: July 3, 2018

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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.

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Docket No. 18-KPPE-343-COC

RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to the LaCrosse Substation, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

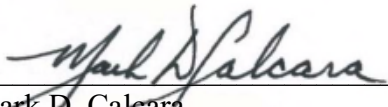
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:   
Mark D. Calcara

Date: 7/10/2018



**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 24  
Date of Request: July 3, 2018

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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.

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Docket No. 18-KPPE-343-COC

RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to the City of Dighton, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

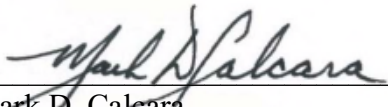
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:   
Mark D. Calcara

Date: 7/10/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 25

Date of Request: July 3, 2018

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

RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to the Ingalls Substation, please provide the following answers:

- Does MKEC include this asset in its transmission formula rates?
- List the customers served by this asset (listing each MKEC member as a separate customer).
- Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

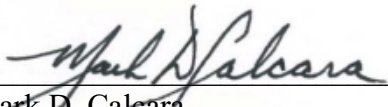
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:   
Mark D. Calcara

Date: 7/10/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 26

Date of Request: July 3, 2018

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. )  
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)  
)  
)

Docket No. 18-KPPE-343-COC

RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 138 kV radial line to the Milan Substation, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

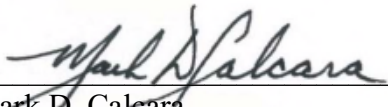
SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:   
Mark D. Calcara

Date: 7/10/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 27  
Date of Request: July 3, 2018

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
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RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to the Arkalon Ethanol Substation, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

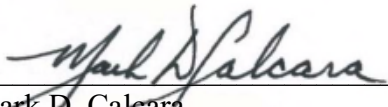
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:   
Mark D. Calcara

Date: 7/10/2018



**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 28  
Date of Request: July 3, 2018

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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.

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) ) Docket No. 18-KPPE-343-COC  
) )  
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) )

RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line to the Dodge City Substation (radial line off Dodge City 115 kV loop between Loren OCHS and North West Dodge Substations) , please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

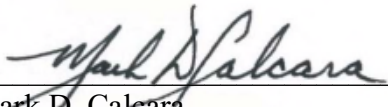
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:   
Mark D. Calcara

Date: 7/10/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 29

Date of Request: July 3, 2018

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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.

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Docket No. 18-KPPE-343-COC

**Please provide the following:**

Please Provide the latest MKEC System map showing the transmission facilities of MKEC with members territory on a map of Kansas (System Map), in pdf format.

**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL

SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

**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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: \_\_\_\_\_

  
Mark D. Calcara

Date: 7/10/2018

**KANSAS POWER POOL'S INFORMATION**  
**REQUESTS TO MID-KANSAS ELECTRIC COMPANY**

Request No. 30

Date of Request: July 3, 2018

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

RE: Follow-up to MKEC response to Staff DR 12 and 16

**Please provide the following:**

Referencing the MKEC 115 kV radial line from Ellsworth to Bushton Substation, please provide the following answers:

- a) Does MKEC include this asset in its transmission formula rates?
- b) List the customers served by this asset (listing each MKEC member as a separate customer).
- c) Please provide the same analysis provided on the response to Staff DR 16a for the usage of each customer on this line.
- d) Please explain how the revenue requirement for this asset is calculated for each customer listed in b.

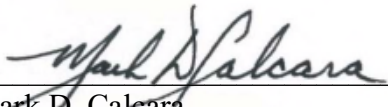
**OBJECTION: Mid-Kansas objects to this data request because it seeks information that is not clearly relevant to the proceedings in this docket as required by the Discovery Order issued in this proceeding. The information sought has no bearing on the Commission's decision to issue or deny a certificate of convenience for transmission right only, and therefore, is clearly not relevant.**

SUBMITTED BY: KANSAS POWER POOL  
SUBMITTED TO: MID-KANSAS ELECTRIC COMPANY

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

### **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 Kansas Power Pool any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:   
Mark D. Calcara

Date: 7/10/2018