

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Complaint Against)	
City of Garden City, Kansas)	
Respondent,)	Docket No. 17-GDCE-370-COM
)	
For an Order Declaring Garden City is)	
Illegally Servicing Conestoga Energy Partners,)	
LLC, in Wheatland Electric Cooperative,)	
Inc.'s Certified Service Territory, and an order)	
to cease,)	
)	
By Wheatland Electric Cooperative, Inc.)	
Complainant)	
_____)	

**ANSWERS OF WHEATLAND TO ORDER DIRECTING
WHEATLAND AND GARDEN CITY TO SUPPLEMENT
THE RECORD WITH ANSWERS TO COMMISSION QUESTIONS**

COMES NOW Wheatland Electric Cooperative, Inc. (Wheatland) and submits its answers to Kansas Corporation Commission (Commission) questions.

- a) Do you currently have the physical facilities/infrastructure in place to provide retail electric service to the Conestoga ethanol plant? In other words, are you equipped to provide such service to Conestoga immediately?

Answer. No, it cannot be serviced immediately with Wheatland owned facilities and infrastructure. However, Wheatland's Board of Trustees has directed that all reasonable measures, to include construction of facilities, will be pursued to quickly and efficiently serve the Conestoga plant. Also, Wheatland owns and operates the sub-transmission 34.5kV facilities that service Garden City's Sub-station 9 (Conestoga).

- b) If not, by when would you be prepared to provide such service, should it be necessary to provide it?

Answer. There are several alternatives if the Commission orders that Wheatland is allowed to serve all customers in its certificated territory. Further, the Wheatland Board of Trustees has directed that any construction facilities to serve Conestoga will be built without aid in construction from Conestoga. The options to provide such service are as follows;

b1. Wheatland will pay local access charge to Garden City for use of Substation 9 – immediate service to Conestoga. This is an arrangement that Wheatland and Garden City already have to serve Garden City from Wheatland Substations. Further, the evidence in this docket will show that Garden City Substation 9 was constructed to serve the Conestoga load.

b2. Purchase Substation 9 from Garden City. – Immediate service to Conestoga. Substation 9 almost exclusively has served the Conestoga facility. Wheatland will offer and pay installed cost minus depreciation. This is the same formula that Garden City has used and authorized in purchasing Wheatland facilities during annexations, and is customary in the industry. See KSA 66-1,176.

b3. Wheatland has access to mobile 34.5kV substation that can be in place in six to eight weeks.

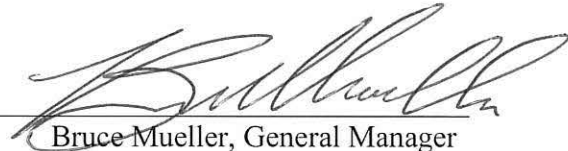
b4. Wheatland will build a 34.5kV permanent substation. 180-210 days.

- c) Also, if not, what do you estimate would be your costs to equip yourself to such service?

Answer. Estimated costs to build a permanent substation at the Conestoga plant is \$1-1.5 million. Wheatland will not ask for aid in construction from Conestoga.

Respectfully submitted,

By



Bruce Mueller, General Manager
Wheatland Electric Cooperative, Inc.

By /s/ James M. McVay

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 22nd day of September, 2017, the above and foregoing Answers of Wheatland to Order Directing Wheatland and Garden City to Supplement the Record with Answers to Commission Questions was served by electronic service to the following parties:

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