

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

Before Commissioners: Pat Apple, Chairman  
Shari Feist Albrecht  
Jay Scott Emler

In the Matter of a General Investigation for the )  
Purpose of Investigating Whether Annual or )  
Periodic Cost/Benefit Reporting by the SPP ) Docket No. 17-SPPE-117-GIE  
and Kansas Electric Utilities that Participate in )  
SPP is in the Public Interest. )

**ORDER OPENING GENERAL INVESTIGATION**

This matter comes before the State Corporation Commission of the State of Kansas (Commission). Having examined its files and records, and being duly advised in the premises, the Commission finds and concludes as follows:

**I. Background**

1. On September 19, 2006, the Commission issued its *Order Adopting Stipulation and Agreement and Granting Applications* in Docket Nos. 06-SPPE-202-COC (06-202 Docket) and 06-WSEE-203-MIS (06-203 Docket). The Order approved the Southwest Power Pool's (SPP) request for a certificate of convenience and authority for the limited purpose of managing and coordinating the use of certain Kansas utilities' transmission facilities.<sup>1</sup> The Commission permitted certain Kansas utilities to transfer functional control of their transmission facilities to SPP<sup>2</sup> and reserved its own authority to require SPP to make filings as required in K.S.A. 66-122 and 66-123.<sup>3</sup> Additionally, the Commission found it had authority to open an investigation, either on its own motion or as the result of a complaint filing, to review SPP's operations as it does with any other certificated utility in Kansas. This includes an investigation by Commission Staff

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<sup>1</sup> See Docket Nos. 06-SPPE-202-COC and 06-WSEE-203-MIS, *Order Adopting Stipulation and Agreement and Granting Applications*, Ordering Clause E (Sept. 19, 2006).

<sup>2</sup> *Id.* at ¶ 20, Ordering Clause E.

<sup>3</sup> *Id.* at ¶ 45, Ordering Clause B.

(Staff) to determine whether SPP's certificate should be revoked or to consider whether Kansas utilities should withdraw from the SPP Regional Transmission Organization (RTO).<sup>4</sup>

2. On June 9, 2014, in Docket No. 14-SPPE-563-SHO (14-563 Docket), the Commission issued a *Show Cause Order; Discovery Order; Protective Order*. Commission Staff's Report and Recommendation, which was incorporated into the Show Cause Order, stated that SPP had not provided sufficient data and time for proper state regulatory analysis regarding public interest, zonal cost/benefit impacts, retail rate impacts, justness and reasonableness, and potential discriminatory/preferential rate treatment with respect to the addition of new SPP members.<sup>5</sup> Staff also asserted that some of the proposed revisions/additions to SPP's Open Access Transmission Tariff (OATT) were potentially detrimental to Kansas retail ratepayers and would set undesirable precedents if SPP's membership continues to grow.<sup>6</sup> The Commission shared Staff's concerns and ordered SPP to show cause why the proposed terms and conditions it offered to the entities collectively known as "Integrated System" (IS) were in the public interest of Kansas retail electric ratepayers.<sup>7</sup>

3. On October 7, 2014, the Commission's *Order Closing Docket* in the 14-563 Docket noted Staff's recommendation that a general investigation be opened: (1) to investigate the value of requiring SPP to file periodic or annual reports to the Commission addressing the benefits of continued SPP membership for Kansas utilities; and (2) to investigate the value of requiring regulated Kansas SPP-member Transmission Owners (TO) to file periodic or annual reports addressing utility specific benefits of continued SPP membership for each utility's retail ratepayers.<sup>8</sup>

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<sup>4</sup> *Id.* at ¶ 58.

<sup>5</sup> See Docket No. 14-SPPE-563-SHO, Staff's Report and Recommendation, p. 2 (June 5, 2014), attached to and incorporated by reference into *Show Cause Order; Discovery Order; Protective Order*, ¶ 5 (June 9, 2014).

<sup>6</sup> *Id.*

<sup>7</sup> *Show Cause Order; Discovery Order; Protective Order*, ¶ 8, Ordering Clause A.

<sup>8</sup> Docket No. 14-SPPE-563-SHO, *Order Closing Docket*, ¶¶ 5-7, Ordering Clause A (Oct. 7, 2014).

4. On September 29, 2016, Staff submitted a Report and Recommendation (R&R) to the Commission, which is attached hereto and incorporated herein by reference. Staff stated: “As determined by the Commission in its 14-563 Order, a docket should be opened to revisit the issue of annual reporting and whether future reporting by SPP and Kansas transmission owners regarding the costs and benefits to Kansas utilities and ratepayers afforded by continued SPP membership is in the public interest.”<sup>9</sup>

5. Staff also provided a brief procedural history of this matter, including a summary of proceedings before the Federal Energy Regulatory Commission (FERC) and the D.C. Circuit Court of Appeals involving the aforementioned IS entities and the Commission.<sup>10</sup>

6. Staff further stated that, because SPP’s role has expanded greatly since the 06-202 Docket and for other reasons more fully explained in the 14-563 Docket, Staff believes this is the appropriate time to open a general investigation to determine whether annual or periodic reporting by SPP, and Kansas utilities that participate in SPP, is in the public interest.

## **II. Jurisdiction**

7. K.S.A. 66-101d authorizes the Commission to initiate general investigations and requires hearings to be held in accordance with the provisions of the Kansas Administrative Procedure Act (KAPA), unless the Commission orders otherwise for good cause.

## **III. Findings and Conclusions**

8. The Commission finds it appropriate at this time to open a general investigation to determine whether annual or periodic reporting by SPP, and by Kansas utilities that participate in

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<sup>9</sup> Docket No. 17-SPPE-117-GIE, Staff’s Report and Recommendation, p. 3 (Sept. 29, 2016) (Staff’s R&R). The 14-563 Docket’s *Order Closing Docket*, to which Staff’s statement refers, contains a scrivener’s error in ¶ 7 and Ordering Clause A when it refers to “reporting by the Commission and Kansas utilities.” Staff’s R&R correctly interprets the 14-563 Order as requiring “reporting by SPP” and Kansas utilities.

<sup>10</sup> *Id.*, pp. 1-3.

SPP, regarding the costs and benefits to Kansas utilities and ratepayers afforded by continued SPP membership, is in the public interest.

9. The Commission desires a thorough and thoughtful discussion as to whether such reporting is in the public interest, and if so, what information the report and any associated study should entail. Therefore, the Commission seeks comment from the parties on the following questions from Staff's R&R, along with any other questions or information the parties deem relevant to the issue of the costs and benefits of continued participation in SPP:

- (a) In the event that the Commission requires a study to determine the costs and benefits associated with continued membership in SPP, what specific parameters should be included in the study?
- (b) Should the study be limited to a comparison of production cost savings associated with the Integrated Market (IM) versus the increased transmission expense and SPP Administration expense associated with membership in SPP?
- (c) Should two separate cost/benefit studies be completed with one on the cost/benefits of the IM and the other on the cost/benefits of the transmission system?
- (d) Should the study be performed by an independent third party consultant, or can this analysis be performed by internal expertise within the utilities?
- (e) How often should such a study be updated once performed?
- (f) How quantifiable and objective would such an analysis be?
- (g) Without a study, is it possible to say with certainty whether Kansas ratepayers are better off today with Kansas electric utilities being members of SPP? Would it be possible after the study?
- (h) What evidence exists today regarding the costs/benefits of SPP membership that *Kansas* ratepayers are benefitting from Kansas utility participation in SPP?
- (i) Over what time period should the study cover? Should the study cover the last five years, ten years, or only since the implementation of the IM?

- (j) Should the study attempt to reflect the anticipated costs and benefits of continued SPP membership for the foreseeable future using data that is known or that can be determined with certainty today?
- (k) What alternatives to SPP membership exist for Kansas electric utilities today?
- (l) Should the study, if required, compare the costs and benefits of SPP to membership in the Midwest Independent System Operator (MISO)?
- (m) What other Regional Transmission Organizations or regional transmission planning entities, if any, should be considered in the analysis of alternatives?
- (n) Is it feasible for Kansas to form its own regional transmission planning entity similar to what New York and California have done? If so, should the costs and benefits of that possibility be evaluated in this study?
- (o) If Kansas utilities were not members of SPP, would there still be opportunities to pursue economy energy sales/purchases from the IM? Would other entities or SPP still use transmission facilities owned by Kansas utilities? To what extent should this be included in the effects of a possible cost/benefit study?
- (p) If Kansas utilities were not members of SPP, would there still be opportunities for Kansas utilities to sell transmission capacity on the facilities located in Kansas and owned by Kansas utilities? To what extent should this be included in the effects of a possible cost/benefit study?

**THEREFORE, THE COMMISSION ORDERS:**

A. A general investigation to examine whether annual or periodic reporting by SPP, and Kansas utilities that participate in SPP, is in the public interest is hereby opened.

B. Parties wishing to provide initial comments in response to paragraph 9 of this Order shall file such comments in the docket within 30 days from the date of this Order. A first round of reply comments may be filed by Staff and the other parties within 30 days from the deadline for the filing of the initial comments. A second round of reply comments may be filed by all parties within 30 days from the deadline for the first round of reply comments.

C. Hearings shall be conducted in accordance with the KAPA.<sup>11</sup>

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<sup>11</sup> K.S.A. 66-101d.

D. SPP, and any Kansas utility that participates in SPP, shall be made a party to this proceeding by entering its appearance.

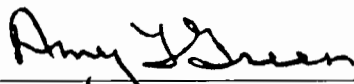
E. The parties have 15 days from the date of electronic service of this Order to petition for reconsideration.<sup>12</sup>

F. The Commission retains jurisdiction over the subject matter and the parties for the purpose of entering such further orders as it deems necessary.

**BY THE COMMISSION IT IS SO ORDERED.**

Apple, Chairman; Albrecht, Commissioner; Emler, Commissioner

Dated: JAN 19 2017

  
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Amy L. Green  
Secretary to the Commission

MJD/sc

**EMAILED**

JAN 19 2017

<sup>12</sup> K.S.A. 66-118b; K.S.A. 77-529(a)(1).

**REPORT AND RECOMMENDATION  
UTILITIES DIVISION**

**TO:** Chairman Jay Scott Emler  
Commissioner Shari Feist Albrecht  
Commissioner Pat Apple

**FROM:** Christine Aarnes, Chief of Telecommunications  
Justin Grady, Chief of Accounting and Finance  
Jeff McClanahan, Utilities Division Director

**DATE:** September 29, 2016

**RE: Docket No. 17-SPPE-117-GIE**

In the Matter of a General Investigation for the Purpose of Investigating Whether Annual or Periodic Cost/Benefit Reporting by the SPP and Kansas Electric Utilities that Participate in SPP is in the Public Interest.

**EXECUTIVE SUMMARY**

In an October 7, 2014, Order in Docket No. 14-SPPE-563-SHO (14-563 Docket), the Commission concluded that it should open a general investigation for the purpose of investigating whether annual or periodic reporting by Southwest Power Pool (SPP), and Kansas utilities that participate in SPP, is in the public interest. Therefore, Staff recommends the Commission issue an Order opening a docket for that purpose.

**BACKGROUND:**

On June 9, 2014, the Commission issued an Order in the 14-563 Docket directing SPP to show cause why the costs associated with the proposed membership of Western Area Power Administration – Upper Great Plains Region (WAPA–UGP), Basin Electric Power Cooperative (Basin), and Heartland Consumers Power District (Heartland) (collectively, Integrated System (IS)), are in the public interest of Kansas electric retail customers.

On July 30, 2014, SPP filed the Direct Testimony of Carl A. Monroe, which explained SPP's assessment of the benefits of IS membership at SPP to Kansas electric retail customers.

On October 6, 2014, Staff filed a Report and Recommendation (R&R) explaining that on September 11, 2014, SPP submitted changes to implement the integration of the IS

entities in a two-part filing with the Federal Energy Regulatory Commission (FERC). SPP requested approval of the proposed changes to the Open Access Transmission Tariff (OATT) in FERC Docket No. ER 14-2850 and approval of proposed changes to the Bylaws and Membership Agreement in FERC Docket No. ER 14-2851.

Staff recommended the Commission file interventions and protests in the aforementioned FERC Dockets and further stated that because unaccounted for negative impacts to the retail customers of the existing load-serving SPP members affect other states in the SPP region as well as Kansas, the Commission's concerns about the benefits of IS membership at SPP would be more fully vetted through participation in the FERC Dockets.

Staff further noted that the Commission specifically addressed various reports and reporting requirements that can be exercised at the Commission's discretion in its Order in SPP's Certificate of Convenience Docket. The Commission declined to require SPP to make an annual filing, electing rather to fully participate through the Regional State Committee (RSC), SPP committees and working groups, and FERC.<sup>1</sup>

Staff raised a concern in its R&R that the breadth of SPP activities has dramatically increased since the 06-202 Certificate of Convenience Docket with the advent of SPP's Integrated Marketplace, the increased volume of transmission projects, and membership expansion efforts. Staff, therefore, recommended that the Commission revisit the issue of annual reporting and determine whether future reporting by SPP and Kansas transmission owners regarding benefits to Kansas utilities and ratepayers afforded by continued SPP membership is in the public interest.

On October 7, 2014, the Commission issued an Order in the 14-563 Docket in which it stated that it shared Staff's concerns. The Commission concluded: (1) that a general investigation docket should be opened for the limited purpose of investigating whether annual or periodic reporting by SPP and Kansas utilities that participate in SPP is in the public interest; (2) the 14-563 Docket should be closed; (3) it would file interventions and protests in the aforementioned FERC dockets; and (4) determination regarding the public interest of Kansas electric retail customers to IS membership in SPP would be deferred until after Orders are issued in the aforementioned FERC dockets.

The Commission filed for intervention and protest in the aforementioned FERC Dockets on October 9, 2014. On November 10, 2014, the FERC issued its Order summarily rejecting the KCC's objections to the tariff modifications proposed by the SPP.<sup>2</sup> The KCC requested rehearing of FERC's November 10 Order on December 10, 2014, and

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<sup>1</sup> See *In the Matter of the Application of Southwest Power Pool, Inc. for a Certificate of Convenience and Authority for the Limited Purpose of Managing and Coordinating the Use of Certain Transmission Facilities Located within the State of Kansas*, Docket No. 06-SPEE-202-COC (06-202 Docket), September 19, 2006 Order.

<sup>2</sup> Order Conditionally Accepting in Part, Rejecting in Part, Accepting and Suspending Filings in Part, Establishing Hearing and Settlement Judge Procedures and Consolidating Proceedings and Directing Compliance Filing, Southwest Power Pool, Inc., FERC Docket No. ER14-2850-000 and ER14-2581-000, 149 FERC ¶ 61,113 (November 10, 2014).



FERC denied the KCC's request on October 15, 2015.<sup>3</sup> The KCC filed an Appeal of the November 10, 2014, and October 15, 2015, FERC Orders with the D.C. Circuit Court of Appeals on December 14, 2015.<sup>4</sup> The Appeal is pending.

### **ANALYSIS:**

As determined by the Commission in its 14-563 Order, a docket should be opened to revisit the issue of annual reporting and whether future reporting by SPP and Kansas transmission owners regarding the costs and benefits to Kansas utilities and ratepayers afforded by continued SPP membership is in the public interest. Specifically, Staff recommends the Commission issue an Order soliciting comments regarding whether it would be appropriate to require Kansas utilities to undertake a study that determines the costs and benefits associated with continued participation in SPP. Staff recommends the Commission request parties to provide comment on at least the following questions, in addition to any other information that the parties deem pertinent to the question of whether continued participation in SPP is in the public interest:

1. In the event that the Commission requires a study to determine the costs and benefits associated with continued membership in SPP, what specific parameters should be included in the study?
2. Should the study be limited to a comparison of production cost savings associated with the Integrated Market (IM) versus the increased transmission expense and SPP Administration expense associated with membership in SPP?
3. Should two separate costs/benefit studies be completed with one on the cost/benefits of the IM and the other on the cost/benefits of the transmission system?
4. Should the study be performed by an independent third party consultant, or can this analysis be performed by internal expertise within the utilities?
5. How often should such a study be updated once performed?
6. How quantifiable and objective would such an analysis be?
7. Without a study, is it possible to say with certainty whether Kansas ratepayers are better off today with Kansas electric utilities being members of SPP? Would it be possible after the study?
8. What evidence exists today regarding the costs/benefits of SPP membership that *Kansas* ratepayers are benefitting from Kansas utility participation in SPP?
9. Over what time period should the study cover? Should the study cover the last five years, ten years, or only since the implementation of the IM?
10. Should the study attempt to reflect the anticipated costs and benefits of continued SPP membership for the foreseeable future using data that is known or that can be determined with certainty today?
11. What alternatives to SPP membership exist for Kansas electric utilities today?

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<sup>3</sup> Order on Rehearing and Clarification, Southwest Power Pool, Inc., FERC Docket No. ER14-2850-001 and ER14-2851-001, 153 FERC ¶ 61, 051 (October 15, 2015).

<sup>4</sup> D.C. Circuit Court of Appeals Case No. 15-1447.

12. Should the study, if required, compare the costs and benefits of SPP to membership in the Midwest Independent System Operator (MISO)?
13. What other Regional Transmission Organizations or regional transmission planning entities, if any, should be considered in the analysis of alternatives?
14. Is it feasible for Kansas to form its own regional transmission planning entity similar to what New York and California have done? If so, should the costs and benefits of that possibility be evaluated in this study?
15. If Kansas utilities were not members of SPP, would there still be opportunities to pursue economy energy sales/purchases from the IM? Would other entities or SPP still use transmission facilities owned by Kansas utilities? To what extent should this be included in the effects of a possible cost/benefit study?
16. If Kansas utilities were not members of SPP, would there still be opportunities for Kansas utilities to sell transmission capacity on the facilities located in Kansas and owned by Kansas utilities? To what extent should this be included in the effects of a possible cost/benefit study?

Although FERC has issued final Orders in the ER 14-2850 and ER 14-2851 Dockets, it may not be appropriate for the KCC to make a determination regarding the public interest of continued Kansas utility membership in SPP while the IS integration case is still being litigated. Staff believes it would be more appropriate to defer this particular issue until litigation regarding ER 14-2850 and ER 14-2851 has concluded. However, given the fact that SPP's role has expanded greatly since the Commission granted it a Certificate in the 06-202 Docket, and for other reasons more fully explained in the 14-563 Docket, Staff believes this is the correct time to open a general investigation for the purpose of investigating whether annual or periodic reporting by SPP and Kansas utilities that participate in SPP is in the public interest. Accordingly, Staff submits this request to open a general investigation to allow the Commission to investigate this matter more completely.

**RECOMMENDATION:**

Staff recommends the Commission issue an Order opening a docket to investigate whether annual or periodic reporting by SPP, and Kansas utilities that participate in SPP, is in the public interest. Staff further requests the Commission direct SPP and Kansas utilities participating in SPP to respond to the questions proposed in this R&R and provide any other information that the parties deem pertinent to the question of whether continued participation in SPP is in the public interest.

## CERTIFICATE OF SERVICE

17-SPPE-117-GIE

I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of

Electronic Service on JAN 19 2017.

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17-SPPE-117-GIE

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17-SPPE-117-GIE

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/s/ DeeAnn Shupe  
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JAN 19 2017