

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners:     Dwight D. Keen, Chair  
                                  Shari Feist Albrecht  
                                  Susan K. Duffy

In the Matter of a General Investigation     )  
Regarding the Rate Study and Assessment     )  
Expenses Resulting from Substitute for Senate     ) Docket No. 20-GIME-068-GIE  
Bill No. 69   )

**ORDER OPENING GENERAL INVESTIGATION**

This matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed the pleadings and record, the Commission makes the following findings and conclusions:

**I. BACKGROUND**

1. Senate Bill No. 69 (“Sub. for SB 69” or the “Bill”) is a bill that directs the Legislative Coordinating Council (“LCC”) to authorize a rate study of Kansas electric utilities. The Bill was introduced by the Kansas Senate on January 31, 2019, approved by the Governor on April 10, 2019, and became effective on April 19, 2019.<sup>1</sup>

2. The purpose of the Bill is to provide information that may assist future legislative and regulatory efforts in developing electric policy that includes regionally competitive electric rates and reliable electric service. The utilities subject to the study include electric public utilities, electric cooperative public utilities exempt from Commission jurisdiction, and the three (3) largest municipally-owned or operated electric utilities by customer count.

3. The Bill requires certain duties to be performed by the Commission. Specifically, the Commission is to assist any organization selected to conduct the study by sharing any subject

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<sup>1</sup> Substitute for S.B. 69 (2019).

matter knowledge regarding Kansas electric public utilities and by facilitating the procurement of any necessary information requested by an organization for the study. Furthermore, the Bill places the Commission responsible for paying the costs of the study through assessments upon the utilities that are subject to the study, pursuant to K.S.A. 66-1502 and amendments thereto, regardless of whether such utilities are subject to the jurisdiction of the Commission.

4. The Bill requires the study to be completed in two parts. The first portion of the study is required to be completed by January 8, 2020, and will examine: (1) the effectiveness of current Kansas ratemaking practices; and (2) options available to the Commission and the Kansas legislature to affect Kansas retail electricity prices to become regionally competitive while providing the best practicable combination of price, quality, and service. The second part of the study, which is required to be completed by July 1, 2020, will examine other consequential energy issues materially affecting Kansas electric rates. The terms of these parts are discussed in more detail below.

## **II. JURISDICTION**

5. Pursuant to K.S.A. 66-150, the Commission shall be responsible for paying the costs of the study through assessments upon utilities that are subject to the study, regardless of whether such utilities are subject to the jurisdiction of the Commission.

6. K.S.A. 66-101d authorizes the Commission to initiate general investigations of electric public utilities and requires hearings to be held in accordance with the provisions of the Kansas administrative procedure act, unless the Commission orders otherwise for good cause. Pursuant to K.S.A. 66-101d, the Commission may establish or substitute rates, rules and regulations, measurements, practices, service or acts as are just and reasonable.

### III. ANALYSIS

7. As detailed above, the Commission is to assist in the procurement of information requested to complete the rate study. The issues to be studied are to be completed and delivered to the Commission in two parts. The first part of the study will examine the following issues:

- The effectiveness of current Kansas ratemaking practices, including whether:
  - Current ratemaking adequately attracts needed utility capital investments and adequately discourages capital investments in Kansas;
  - Current ratemaking appropriately balances utility profits with the public interest objectives of achieving competitive rates over time while providing the best practicable combination of price, quality, and service;
  - Kansas electric public utilities are currently recovering from Kansas retail electric ratepayers the full or partial cost, including a return on investment, of any investments that are no longer fully used or required to be used in service to the public within the state of Kansas, including, but not limited to, generation capacity investments;
  - The investments that Kansas electric public utilities have made in electric transmission and renewable generation resources have contributed, and to what extent, to the obsolescence of all the other generation facility investments of such utilities;
  - Allowing Kansas investor-owned electric public utilities to recover costs through surcharges and riders, without a comprehensive

ratemaking process, has unnecessarily contributed to rising wholesale and retail electricity prices;

- The current ratemaking processes for Kansas electric cooperatives and municipal utilities are in the public interest; and
- Electricity providers in surrounding states are subject to similar state laws, regulations, and oversight to such requirements in Kansas.

8. The second part of the study will examine other consequential energy issues materially affecting Kansas electric rates, including:

- Whether any costs incurred by Kansas electric public utilities to build and operate electric vehicle charging stations, including any necessary upgrades to distribution infrastructure, are recovered from ratepayers not using electric vehicle charging services;
- How rates for electric vehicle charging services should be designed to ensure such rates are just and reasonable and not subsidized by other utility consumers;
- The potential effects of deregulating electric vehicle charging services in Kansas, including whether deregulation would ensure electric vehicle charging stations are not subsidized by public utility ratepayers not using electric vehicle charging services;
- Whether Kansas consumers could benefit from improved access to advanced energy solutions, including micro grids, electric vehicles, charging stations, customer generation, battery storage, and transactive energy;
- The extent to which transmission investments by Kansas electric public utilities have impacted retail rates, including any incremental regional transmission costs

incurred by Kansas ratepayers for transmission investments in other states, and whether such costs have been fully offset by financial benefits such as improved access to low cost renewable energy and wholesale energy markets;

- The costs and benefits incurred by Kansas ratepayers for transmission investments in Kansas used to export energy out of Kansas;
- How rate increases or the associated costs of Kansas investor-owned electric public utilities impact the retail electric rates of Kansas electric cooperatives and municipal utilities;
- Whether retail electric rates in Kansas are a material barrier to economic development in Kansas;
- The impact of contract rates with commercial and industrial customers and economic development rates on other customer classes, including whether expanded utilization of such approaches could benefit all customers over time;
- Whether Kansas electric public utilities recover their costs of servicing customers from each customer class on the bases of cost causation;
- How cyber and physical security and grid stabilization efforts have affected, or are projected to affect, electric public utility rates;
- The value of a utility integrated resource planning process that requires state regulatory approval; and
- Economic analysis of the price fluctuations of generation fuels on the cost of electricity.

9. The Bill requires the first and second parts of the study to be made available on the Commission website by January 8, 2020, and July 1, 2020, respectively. The Commission

shall then submit the first and second parts of the study to the Kansas House and Senate Utilities Committees by January 14, 2020, and January 12, 2021, respectively.

#### **IV. FINDINGS AND CONCLUSIONS**

10. The Commission finds it appropriate at this time to open a general investigation for the purpose of investigating the rate study and assessment expenses resulting from Substitute for Senate Bill No. 69.

11. Commission Staff (Staff) has prepared a Report and Recommendation regarding this proposed investigation. A copy of this Report and Recommendation is attached to this Order as Attachment A and is hereby adopted and incorporated by reference. Staff's Report and Recommendation outlines the information described above and recommends a general investigation for the following purposes: (1) track time assigned to the study; (2) issue assessments to all affected electric public utilities; and (3) to create a permanent repository for the rate study.

#### **IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:**

A. A general investigation shall be opened to track the time assigned to the rate study, issue assessments to all affected electric public utilities, and create a permanent repository for the rate study.

B. Electronic service shall be used for these proceedings, including service of this Order.

C. Parties have 15 days, plus three days if service is by mail, from the date of service of this Order to petition the Commission for reconsideration or request a hearing, as provided by K.S.A. 77-542.

D. The Commission retains jurisdiction over the subject matter and the parties for the purpose of entering such further order as it may deem necessary and proper.

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

Keen, Chair; Albrecht, Commissioner; Duffy, Commissioner

Dated: \_\_\_\_\_

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Lynn M. Retz  
Secretary to the Commission

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**REPORT AND RECOMMENDATION  
UTILITIES DIVISION**

**TO:** Chair Dwight D. Keen  
Commissioner Shari Feist Albrecht  
Commissioner Susan K. Duffy

**FROM:** Andria Jackson, Senior Managing Auditor  
Justin Grady, Chief of Accounting and Finance  
Jeff McClanahan, Director

**DATE:** July 30, 2019

**SUBJECT:** 20-GIME-068-GIE: Recommendation to Initiate a General Investigation  
Regarding the Rate Study and Assessment Expenses Resulting from Substitute for  
Senate Bill No. 69.

**EXECUTIVE SUMMARY:**

Staff recommends the Commission open a general investigation related to the rate study authorized by the legislature with the passing of Senate Bill No. 69 (SB 69). This general investigation will allow Staff and the Commission to track time and assess expenses related to the study of retail rates to the Kansas electric public utilities that are subject to the study.

**BACKGROUND:**

Substitute for Senate Bill No. 69 (Sub. for SB 69 or the "Bill") is a bill that directs the Legislative Coordinating Council (LCC) to authorize a rate study of Kansas electric utilities. The Bill was introduced by the Senate on January 31, 2019, approved by the Governor on April 10, 2019, and became effective on April 19, 2019.<sup>1</sup> The purpose of the Bill is to provide information that may assist future legislative and regulatory efforts in developing electric policy that includes regionally competitive electric rates and reliable electric service. The utilities subject to the study include electric public utilities, electric cooperative public utilities exempt from Kansas Corporation Commission (KCC) jurisdiction, and the three largest municipally-owned or operated electric utilities by customer count.

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<sup>1</sup> Substitute for S.B. 69 (2019).

The Bill requires certain duties to be performed by the KCC. Specifically, the KCC is to assist any organization selected to conduct the study by sharing any subject matter knowledge regarding Kansas electric public utilities and by facilitating the procurement of any necessary information requested by the organization for the study.<sup>2</sup> Furthermore, the Bill places the KCC responsible for paying the costs of the study through assessments upon the utilities that are subject to the study, pursuant to K.S.A. 66-1502, and amendments thereto, regardless of whether such utilities are subject to the jurisdiction of the Commission.

The Bill requires the study to be completed in two parts. The first portion of the study is required to be completed by January 8, 2020, and will examine: (1) the effectiveness of current Kansas ratemaking practices; and (2) options available to the KCC and the Kansas legislature to affect Kansas retail electricity prices to become regionally competitive while providing the best practicable combination of price, quality, and service. The second part of the study, which is required to be completed by July 1, 2020, will examine other consequential energy issues materially affecting Kansas electric rates. The terms of these parts are discussed in more detail below.

**ANALYSIS:**

As previously stated, the KCC is to assist in the procurement of information requested to complete the rate study. The issues to be studied are to be completed and delivered to the KCC in two parts. The first part of the study will examine the following issues:

- The effectiveness of current Kansas ratemaking practices, including whether:
  - Current ratemaking adequately attracts needed utility capital investments and adequately discourages unnecessary capital investments in Kansas;
  - Current ratemaking appropriately balances utility profits with the public interest objectives of achieving competitive rates over time while providing the best practicable combination of price, quality, and service;
  - Kansas electric public utilities are currently recovering from Kansas retail electric ratepayers the full or partial cost, including a return on investment, of any investments that are no longer fully used or required to be used in service to the public within the state of Kansas, including, but not limited to, generation capacity investments;
  - The investments that Kansas electric public utilities have made in electric transmission and renewable generation resources have contributed, and to what extent, to the obsolescence of all the other generation facility investments of such utilities;
  - Allowing Kansas investor-owned electric public utilities to recover costs through surcharges and riders, without a comprehensive ratemaking process, has unnecessarily contributed to rising wholesale and retail electricity prices;
  - The current ratemaking processes for Kansas electric cooperatives and municipal utilities are in the public interest; and

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<sup>2</sup> Such information is subject to the Kansas Open Records Act, the Judicial Review Act, the Kansas Administrative Procedures Act, and any other applicable law or regulations applicable to the KCC.

- Electricity providers in surrounding states are subject to similar state laws, regulations, and oversight to such requirements in Kansas.
- Options available to the KCC and the Kansas legislature to affect Kansas retail electricity prices to become regionally competitive while providing the best practicable combination of price, quality, and service, including reviewing whether:
  - Capital expenditures and operating expenses of Kansas electric public utilities can be managed to achieve and sustain competitive retail rates while maintaining adequate and reliable service;
  - Any performance-based regulation, economic development initiatives, price-cap regulation or other non-traditional ratemaking methods should be considered to reduce retail electric rates or the level of increase of any rate;
  - Competitive markets for retail electricity could benefit all Kansas consumers;
  - Further investments in energy efficiency and renewable energy, including revenue decoupling and renewable energy incentives, could benefit all Kansas consumers;
  - Securitized ratepayer-backed bonds could benefit utilities and ratepayers by reducing investment risk, facilitating the recovery of certain stranded costs from under-utilized or otherwise obsolete generating and other facilities and lowering retail electric rates, and assisting in the transition to new technologies, including a review of whether securitized bonds could be effectively utilized by Kansas utilities;
  - Kansas sales tax, property taxes, assessment rates, and other fees and taxes on utilities are comparable to other states in the region and how such taxes and fees impact the competitiveness of utility rates;
  - Kansas electric utilities and the KCC may reduce the cost impacts of decisions of the Southwest Power Pool (SPP) by advocating for certain positions through the SPP's stakeholder and regional state committee processes, including an identification of current and future issues most likely to impact Kansas retail electric rates;
  - Any other regulatory actions are available to the KCC to manage or reduce retail electric rates; and
  - Legislative enactments could address retail electric rate escalation in Kansas.

The second part of the study will examine other consequential energy issues materially affecting Kansas electric rates, including:

- Whether any costs incurred by Kansas electric public utilities to build and operate electric vehicle charging stations, including any necessary upgrades to distribution infrastructure, are recovered from ratepayers not using electric vehicle charging services;
- How rates for electric vehicle charging services should be designed to ensure such rates are just and reasonable and not subsidized by other utility consumers;
- The potential effects of deregulating electric vehicle charging services in Kansas, including whether deregulation would ensure electric vehicle charging services are not subsidized by public utility ratepayers not using electric vehicle charging services;
- Whether Kansas consumers could benefit from improved access to advanced energy solutions, including micro grids, electric vehicles, charging stations, customer generation, battery storage, and transactive energy;

- The extent to which transmission investments by Kansas electric public utilities have impacted retail rates, including any incremental regional transmission costs incurred by Kansas ratepayers for transmission investments in other states, and whether such costs have been fully offset by financial benefits such as improved access to low cost renewable energy and wholesale energy markets;
- The costs and benefits incurred by Kansas ratepayers for transmission investments in Kansas used to export energy out of Kansas;
- How rate increases or the associated rising costs of Kansas investor-owned electric public utilities impact the retail electric rates of Kansas electric cooperatives and municipal utilities;
- Whether retail electric rates in Kansas are a material barrier to economic development in Kansas;
- The impact of contract rates with commercial and industrial customers and economic development rates on other customer classes, including whether expanded utilization of such approaches could benefit all customers over time;
- Whether Kansas electric public utilities recover their costs of servicing customers from each customer class on the basis of cost causation;
- How cyber and physical security and grid stabilization efforts have affected, or are projected to affect, electric public utility rates;
- The value of a utility integrated resource planning process that requires state regulatory approval; and
- Economic analysis of the price fluctuations of generation fuels on the cost of electricity.

The Bill requires the first and second parts of the study to be made available on the KCC's website by January 8, 2020, and July 1, 2020, respectively. The Commission shall then submit the first and second parts of the study to the House and Senate utilities committees by January 14, 2020, and January 12, 2021, respectively.

As previously stated, the costs of such study is to be paid by the KCC in the form of assessments pursuant to K.S.A. 66-1502, and amendments thereto, upon the utilities that are subject to the study.

**RECOMMENDATION:**

Staff recommends the Commission open a general investigation for the following purposes: (1) to track time assigned to the study; (2) to issue assessments to all affected electric public utilities; and (3) to create a permanent repository for the rate study. It should be noted that there will not necessarily be a need for a final Commission order in this docket. The only action needed from the Commission would be to close the docket once the study is complete. The Commission could, however, order additional general investigations to be opened as a result of the rate study, if it desires.

## CERTIFICATE OF SERVICE

20-GIME-068-GIE

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on \_\_\_\_\_.

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/S/ DeeAnn Shupe  
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