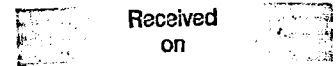


**THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

**Application of ITC Great Plains, LLC and Mid-)
Kansas Electric Company, LLC Transmission Siting)
in Cloud and Ottawa Counties)**

Docket No. 13-ITCE-677-MIS



JUN 03 2013

by
State Corporation Commission
of Kansas

DIRECT TESTIMONY

OF

THOMAS B. DEBAUN

ON BEHALF OF

THE STATE CORPORATION COMMISSION

OF THE STATE OF KANSAS

June 3, 2013

1 **Q. Please state your name.**

2 A. My name is Thomas B. DeBaun. My business address is 1500 SW Arrowhead Road,
3 Topeka, Kansas 66604-4027.

4 **Q. By whom, and in what capacity, are you employed?**

5 A. I am a Senior Energy Engineer in the Energy Operations Section, Utilities Division,
6 Kansas Corporation Commission.

7 **Q. Please summarize your educational background and professional experience.**

8 A. I hold a Bachelor of Science degree in Electrical Engineering from Kansas State
9 University. My experience includes an undergraduate internship at an area electric
10 generating station and subsequent employment with an investor owned electric utility in
11 Chicago as distribution engineer and residential/commercial marketing representative. I
12 returned to Kansas to become an owner and eventually president of a small, privately
13 held retail corporation. I joined the Commission in 2000 as a Pipeline Safety Engineer
14 and assumed my present position in 2002.

15 For the past decade, I have represented the Commission as a staff liaison at numerous
16 Southwest Power Pool, Inc. (SPP) working groups, task forces, and planning summits.
17 At the present, I am Chairman of the Cost Allocation Working Group (CAWG), which is
18 subordinate to the state regulatory commissioners' committee—the Regional state
19 Committee (RSC). I typically attend over 75 SPP face-to-face meetings or
20 teleconferences per year.

21 **Q. Have you previously testified before this Commission?**

1 A. Yes. I testified in all six of the previous line siting applications that have come before the
2 Commission since SPP was approved by the Federal Energy Regulatory Commission
3 (FERC) as a Regional Transmission Organization in 2004, as well as, other dockets.

4 **Q. What is the purpose of your testimony in this proceeding?**

5 A. The primary purpose of my testimony in this Joint Application is to address the necessity
6 of the ITC Great Plains, LLC (ITC Great Plains, ITCGP) portion of an SPP-approved 345
7 kV (345,000 volt or 345 kilovolt) transmission project referred to as the Elm Creek to
8 Summit Project. I will also consider benefits afforded by the line to consumers in Kansas
9 and consumers outside of Kansas, as well as, economic development benefits in Kansas
10 as indicated in K.S.A. 66-1,180.¹ I will also address some aspects of cost allocation and
11 recommend the Commission require quarterly reports from the Elm Creek to Summit
12 project owners until such time as the associated upgrades are complete and all
13 engineering and construction costs are know.

14 **Q. Please outline your testimony.**

15 A. I intend to present information to the Commission on the following topics and in the
16 following sequence:

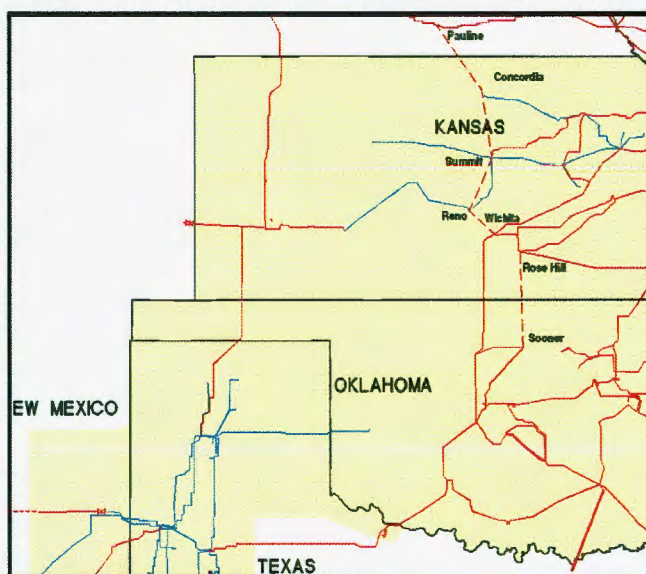
- 17 I. History, scope, and costs
- 18 II. Necessity, benefits, and economic development
- 19 III. Project tracking

¹ 66-1,180. Same; siting; proceedings; permit. All hearings conducted pursuant to this act shall be in accordance with the provisions of the Kansas administrative procedure act. All such hearings shall be completed within 30 days after the commencement thereof, unless the electric utility requests a continuance of any such hearing. All costs of any hearing pursuant to this act shall be taxed against the electric utility. The commission shall make its decision with respect to the necessity for and the reasonableness of the location of the proposed electric transmission line, taking into consideration the benefit to both consumers in Kansas and consumers outside the state and economic development benefits in Kansas. The commission shall issue or withhold the permit applied for and may condition such permit as the commission may deem just and reasonable and as may, in its judgment, best protect the rights of all interested parties and those of the general public.

1 **I. History, Scope, and Costs**

2 **Q. Please provide a brief history of the Elm Creek to Summit transmission project.**

3 A. The proposed project has appeared in SPP Planning studies for a number of years. As an
4 example, an SPP presentation by Mr. Jay Caspary covered the results of an SPP study of
5 potential transmission expansion that would benefit both Kansas & Nebraska in October
6 2005, at Kansas Electric Transmission Summit III. The entire 345 kV line considered in
7 that study included multiple line segments from Sooner, Oklahoma to Pauline, Nebraska
8 as illustrated in Figure 1 (dashed lines in red).²



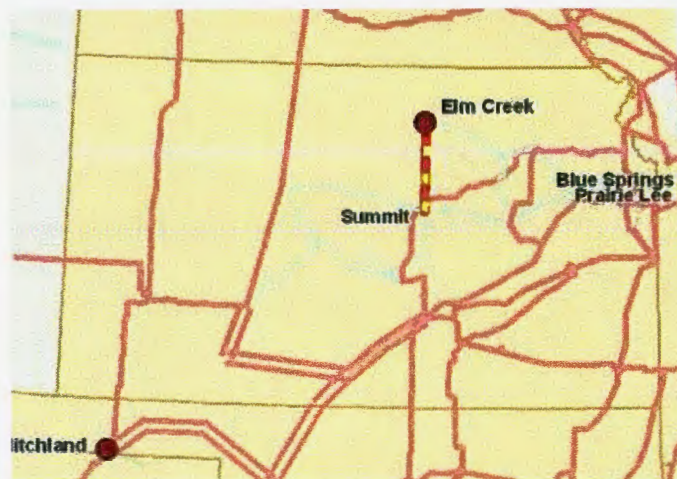
9
10 Figure 1

11 The Commission previously granted line siting applications for two of the segments in
12 Figure 1. A 345 kV transmission projects from Rose Hill, Kansas to the Oklahoma

² "Cost /Benefit Analysis of Potential Kansas Transmission Lines, Jay Caspary (SPP). Presentation to Kansas Electric Transmission Summit III, Robert J. Dole Institute, University of Kansas West Campus, Lawrence, Kansas, October 31, 2005.

1 border (Rose Hill to Sooner Project) was approved by Commission Order in 2008³ and,
2 prior to that, the Wichita – Reno – Summit line in 2007⁴.

3 Upon subsequent study, SPP authorized the actual construction of the Elm Creek
4 to Summit transmission line (the Summit to Concordia line segment in Figure 1) in
5 January 2012. The project forms a connection between two Transmission Owners (TOs),
6 namely the ITC Great Plains Elm Creek substation southeast of Concordia and the
7 Westar, Inc. (Westar) Summit substation southeast of Salina. In keeping with the SPP
8 Open Access Transmission Tariff (OATT), the two TOs decided among themselves
9 which part of the project would be provided by each entity.⁵ Westar will build
10 approximately 29 miles of the southern portion of the line and ITC Great Plains will build
11 approximately 30 miles of the northern portion. The Elm Creek to Summit line is
12 depicted in Figure 2, including a new transformer at Elm Creek (red dot).



13
14 Figure 2

³ Docket No. 08-WSEE-609-MIS, In the Matter of the Application of Westar Energy, Inc. and Kansas Gas and Electric Company (Collectively "Westar") for a Siting Permit for the Construction of a 345 kV Transmission Line in Butler, Sumner and Cowley Counties, Kansas; Commission Order, April 25, 2008.

⁴ Docket No. 07-WSEE-715-MIS, In the Matter of the Application of Westar Energy, Inc. and Kansas Gas and Electric Company (collectively "Westar") for a Siting Permit for the Construction of a 345 kV Transmission Line in Sedgwick, Harvey, Reno, McPherson and Saline Counties, Kansas; Commission Order, May 16, 2007.

⁵ SPP OATT, Attachment O, Section IV (4).

1 **Q. What is the scope of the project that is the subject of this application?**

2 A. On March 18, 2013, SPP issued a final version of a Notification to Construct (SPP-NTC-
3 200222⁶) directing ITC Great Plains to build four upgrades included in the 345 kV
4 project from ITC Great Plains' Elm Creek Substation (near Concordia) to Westar's
5 Summit Substation (near Summit). In addition its portion of the line, ITC Great Plains
6 was directed to install a new 345 kV/230 kV transformer, oil filled reactor and bus work,
7 etc. (collectively, "Network Upgrades")⁷.

8 **Q. Why is this line siting application a Joint Application?**

9 A. The overall Elm Creek to Summit project (SPP Project ID: 30367) will be split between
10 the "incumbent" transmission owners of the substations serving as the electrical
11 terminations for the ends of the line segment—namely ITC Great Plains, owner of the
12 Elm Creek Substation, and Westar, owner of the Summit Substation. According to the
13 SPP Open Access Transmission Tariff (SPP OATT), Attachment O, Section IV.4, "If
14 there is more than one Transmission Owner designated to construct a project, the
15 Designated Transmission Owners will agree among themselves which part of the project
16 will be provided by each entity." Westar and ITC-Great Plains negotiated the
17 apportionment of the project. Subsequently and pursuant to an existing Co-Development
18 Agreement between ITC Great Plains and Mid-Kansas Electric Company, LLC (Mid-
19 Kansas), ownership of the portion assigned to ITC Great Plains will be further divided
20 between ITC Great Plains and Mid-Kansas (ITCGP/Mid-Kansas).⁸ Thus, the
21 ITCGP/Mid-Kansas Joint Application is the subject of this application, while Westar
22 filed a separate Application (Docket No. 13-WSEE-676-MIS). There will be three

⁶ Application, Exhibit 3, SPP Notification to Construct, March 18, 2013.

⁷ *Ibid.* Application, ¶ 9, p. 5,

⁸ *Ibid.* p.5, footnote 2

1 certified public utilities in Kansas who own portions of the approximately 60-mile
2 project.

3 **Q. What are the estimated costs for ITCGP/Mid-Kansas assigned portion of the Elm
4 Creek to Summit Project?**

5 A. ITCGP/Mid-Kansas estimate their portion of the project will cost \$46.8 million. The
6 SPP-approved upgrades assigned to ITC-Great Plains under NTC 200222 are as follows:

Notice to Construct: SPP-NTC-200222

Project ID: 30367

Need Date for Project: March 1, 2018

Upgrade ID	Network Upgrade Name	Estimated Cost
50425	Build new 345 kV line from Elm Creek to Summit (ITCGP portion)	\$ 31,312,169
50426	Insatall new 345/230 kV transformer at Elm Creek	\$ 5,405,101
50427	Bus work on 345 kV side at Elm Creek substation	\$ 8,243,291
50428	Bus work on 230 kV side at Elm Creek substation	\$ 1,886,035
		<u>\$ 46,846,596</u>

7

8

Table 1

9 **Q. Will ITCGP/Mid-Kansas portion of the Elm Creek to Summit project be entirely
10 funded on a region-wide basis?**

11 A. It appears that approximately \$39.5 million of the total estimated costs associated with
12 Upgrades 50425 and 50427 will be recovered as Highway (region-wide) projects.
13 Upgrades 50426 and 50428 total approximately \$7.3 million of the estimated costs and
14 will be “Byway” (zonally) funded. Under present SPP cost allocation methodologies,
15 “base plan funding” for projects operating at or above 300 kV means 100% of the cost
16 (revenue requirement) is recovered on a Highway (region-wide) basis, while projects
17 between 100 kV and 300 kV are allocated 1/3 Highway (region-wide) and 2/3 Byway
18 (zonal). The system voltage on the low-side of a transformer (e.g. 345/230 kV)
19 determines whether associated cost will be designated as Highway or Byway. Region-

1 wide charges are allocated to 16 pricing zones in SPP based on the zone's load ratio share
 2 (% of annualized SPP system monthly peak load). Mid-Kansas' load ratio share is
 3 1.41% of SPP's total annualized system monthly peak load.

4 **Q. How will the costs related to the ITCGP/Mid-Kansas portion of the Elm Creek to
 5 Summit Project Mid-Kansas retail customers?**

6 A. ITC Great Plains and Mid-Kansas estimate the monthly cost for a Mid-Kansas residential
 7 customer using 1000 kWh per month to be approximately \$0.37 per month (\$4.46 per
 8 year).⁹ The estimated monthly and annual amounts shown in Table 2 apply to the first
 9 year when the project is "in service" and all of the estimated upgrade costs are included
 10 in Mid-Kansas' rates.

Base Plan Funding	Upgrade ID	Upgrade Costs	Monthly	Annual
Highway (Region-wide)	50425 & 50427	\$ 39,555,461	\$ 0.038	\$ 0.456
Byway (Zonal)	50426 & 50428	\$ 7,291,134	\$ 0.334	\$ 4.008
			\$ 0.372	\$ 4.464

12 Table 2

13 The billing amounts will decline gradually over the 40-year life of the assets due to
 14 depreciation.

15 **Q. Is there anything else regarding ratepayer impacts the Commission should be aware
 16 of as it considers the Application?**

17 A. Yes. The ITCGP/Mid-Kansas analysis summarize in Table 2 appropriately reflects the
 18 cost the portion of the Elm Creek to Summit Project that is assigned to ITC Great Plains
 19 in the instant Joint Application. The Commission may wish to be mindful that Mid-
 20 Kansas' retail customers will also be paying for the regionally funded portion of Westar's
 21 upgrade (Upgrades 50429, estimated \$66 million) in the Elm Creek to Summit Project.

⁹ ITCGP Response to Staff Data Request No.1, May 28, 2013.

1 Also, the entire Elm Creek to Summit Project is included in the 2012 ITP10 Report and
2 there are eight additional, regionally funded projects in the same portfolio.¹⁰ As
3 originally approved, the other regionally funded projects (over 300 kV) with Conditional
4 Notices to Construct in the 2012 ITP10 Report totaled approximately \$900 million.¹¹
5 None of these additional projects will be constructed in Kansas, but Mid-Kansas
6 customers will pay approximately 1.4 % for the recovery costs for these projects in
7 addition to the recovery costs of the Elm Creek to Summit Project.

8 9 II. Necessity, Benefits, and Economic Development

10 **Q. Please discuss the necessity of the ITC Great Plains/Mid-Kansas transmission**
11 **project.**

12 A. SPP is a FERC jurisdictional Regional Transmission Organization (RTO) and
13 transmission expansion planning is a fundamental role of RTOs. SPP is also a regulated
14 electric public utility under the laws of Kansas and is authorized conduct transmission
15 system planning for other electric public utilities in Kansas.¹² The necessity for the
16 overall project with five underlying upgrades was determined by SPP Engineering
17 through the Integrated Transmission Planning (ITP) process. ITP is an iterative three-
18 year process that includes 20-year and 10-year Assessments with consecutive 18-month
19 study cycles; and “Near Term” assessments every year. The Elm Creek to Summit
20 project is one of multiple projects in the 2012 Integrated Transmission Plan, 10-Year

¹⁰2012 Integrated Transmission Plan, 10-Year Assessment Report, January 31, 2012, p. 10. (Staff Exhibit TBD-1)

¹¹ *Ibid.* 2012 ITP10 Report, Table 19.4 [less transformers and lines below 300 kV], p. 138

¹² Docket No. 06-SPPE-203-COC, 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; Commission Order, September 19, 2006.

1 Assessment Report (2012 ITP10 Report) (Exhibit TBD-1) that was approved by the SPP
2 Board of Directors in January 2012.

3 **Q. Is this project necessary?**

4 A. Yes. I believe the Elm Creek to Summit Project is primarily necessary for future
5 reliability reasons. According to the 2010 ITP10 Assessment, many issues were
6 identified for the eastern portion of the state of Kansas during the next ten years. The
7 majority of these issues were related to congestion on lower voltage transmission lines
8 and resulted in the study of eight (8) other potential projects in Kansas, most of which
9 were rejected for this ITP study cycle. The Elm Creek to Summit Project was approved
10 because it resolves a potential violation of reliability criteria (low voltage, “voltage
11 collapse”) on other lower capacity transmission lines in the Concordia vicinity that would
12 be caused by the loss of the 230 kV line between Northwest Manhattan and Elm Creek
13 substations.¹³

14 **Q. Was the Elm Creek to Summit line studied separately from other proposed projects**
15 **in the SPP Region?**

16 A. Every project is evaluated through a comparison of how the transmission models operate
17 with the project in the system, and then, with the project removed from the system. The
18 Elm Creek to Summit Project was eventually approved last year as one of nine “major”
19 projects located throughout the SPP region in the 2012 ITP10 Report.¹⁴ In total, the
20 recommended 2012 ITP10 portfolio was estimated to be \$1.5 billion for engineering and

¹³ *Ibid.* 2012 ITP10 Report, p.52.

¹⁴ *Ibid.* p.10.

1 construction cost and included projects needed to meet potential reliability, economic,
2 and public policy objectives.¹⁵

3 **Q. What are the benefits of the Elm Creek to Summit Project?**

4 A. As demonstrated in the 2012 ITP10 Report, future reliability is the most important benefit
5 of the Elm Creek to Summit Project that is directly assignable to ratepayers and/or
6 “consumers in Kansas and consumers outside the state”.¹⁶ In the study, all the reliability
7 upgrades were evaluated in the economic model to determine economic benefit and
8 replaced with economic projects where possible.¹⁷ However, in the final “2012 ITP10
9 Recommended Project List”, the upgrades assigned to ITC-Great Plains were designated
10 as “Regional Reliability” upgrades.¹⁸ Thus, the benefits to state/region for these upgrades
11 are primarily for operational reliability, or in other words, in SPP’s economic modeling
12 the benefit-to-cost ratio of the project was less than 1.0.

13 While operational reliability is the primary benefit to both consumers in Kansas and
14 consumers outside the state, the project will support future SPP markets and provide
15 additional societal benefits, as stated in the Direct Testimony of Kristine M. Schmidt.¹⁹

16 **Q. Does the Elm Creek to Summit Project contribute to economic development when
17 considered as indicated by K.S.A 66-1,180?**

18 A. This \$46.8 million project will contribute to economic development. In economic
19 development studies, such as those cited in the Direct Testimony of Kristine M. Schmidt,
20 the initial cost of a project is captured as an attribute (direct effect) and then extrapolated

¹⁵ *Ibid.* p. 9.

¹⁶ K.S.A. 66-1,180 (see footnote 1 for text).

¹⁷ 2012 ITP10 Report, Reliability and Economic Efficiencies, pp. 33-34.

¹⁸ *Ibid.* 2012 ITP10 Recommended Project List, p. 131.

¹⁹ Direct Testimony of Kristine M. Schmidt on Behalf of ITC Great Plains, LLC and Mid-Kansas Electric Company, LLC., p.3, lines 10-13.

1 from that basis to calculate other possible economic benefits, all of which are aggregated
2 to determine a “total effect”.²⁰ As concluded by SPP in testimony in a previous docket,
3 “These models are classic input-output models commonly used by economists, state and
4 federal governments, and state economic development departments to estimate potential
5 economic impacts of projects”.²¹ Transmission projects in this light would be no
6 different from any other type of project, in that, if any investment is made and cost
7 recovery can be reasonably expected, there will be economic development benefits.
8 While it may be a fundamental economic fact that investing money will likely produce
9 economic development, Staff believes such analyses are of secondary value for
10 determining whether a specific transmission system upgrade is necessary—or not
11 necessary.

12 **III. Project Tacking**

13 **Q. Are there additional matters the Commission should consider in the Joint**
14 **Application for siting approval?**

15 A. Yes. Staff requests the Commission continue a requirement for quarterly transmission
16 project status reporting as established in previous line siting Orders. Such reports would
17 be general in nature and include, but not be limited to, adherence with construction
18 schedule, expenditures to date, materials procurement, easement acquisition, and changes
19 in cost estimates. The reports would be required until such time as the project is in
20 service and the final engineering and construction costs are known and posted in rates.
21 Typically, status reports have been submitted as “confidential” and continuation of this
22 practice is acceptable to Staff.

²⁰*Ibid.* Direct Testimony, Kristine M. Schmidt, p.12, lines 3-20.

²¹ Docket No. 11-ITCE-644-MIS, Direct Testimony of Katherine Prewitt, Director, Planning, Southwest Power Pool, Inc., p.17, lines 13-15.

1 **Q. Has the Commission previously considered reporting requirements for transmission**
2 **projects subject to line siting approval?**

3 A. Commission Orders in previous dockets have included a provision requiring quarterly
4 reporting of project status.²² In Docket No. 10-ITCE-557-MIS, the Commission Order
5 ¶77 found “...that such information is important in understanding the complete impact of
6 an electric transmission line and that reporting of such information should be included as
7 part of a siting application proceeding.”

8 **Q. Please summarize your testimony.**

9 A. Staff believes this important transmission project is necessary and recommends the
10 Commission approve the Joint Application. The project will assure future reliability
11 benefits to SPP customers. It is also likely to produce associated economic development
12 benefits to Kansas and the SPP region.

13 Staff also recommends the Commission conclude in its Order that quarterly project status
14 reports will be required until such time as the project is in service and the final
15 engineering and construction are known and posted in rates.

16 **Q. Does this conclude your testimony?**

17 A. Yes.

18

²² Docket No. 10-ITCE-557-MIS, In the Matter of the Application of ITC Great Plains, LLC for Siting Permit for the Construction of a 345-kV Transmission Line in Ellis, Rooks, Osborne and Smith Counties, Kansas; Commission Order, Conclusion (C), June 30, 2010. Docket No. 11-ITCE-644-MIS, In the Matter of the Application of ITC Great Plains, LLC for a Siting Permit for the Construction of a Double-Circuit 345-kV Transmission Line in Ford, Clark, Kiowa and Barber Counties, Kansas; Commission Order, Conclusion (C), July 12, 2011. Docket No. 11-PWTE-600-MIS, In the Matter of the Application of Prairie Wind Transmission, LLC for a Siting Permit for the Construction of a Double Circuit 345 kV Transmission Line in Sedgwick, Sumner, Harper, and Barber Counties, Kansas; Commission Order, Conclusion (C), June 28, 2011.

Staff Exhibit TBD-1

Docket No. 13-WSEE-677-MIS

**2012 Integrated Transmission
Plan 10-Year Assessment
Report**

January 31, 2012

Engineering

NOTE: The 140-page report is available using the following link:

<http://www.spp.org/publications/20120131%202012%20ITP10%20Report.pdf>

CERTIFICATE OF SERVICE

13-ITCE-677-MIS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Direct Testimony was served by electronic service on this 3rd day of June, 2013, to the following parties who have waived receipt of follow-up hard copies.

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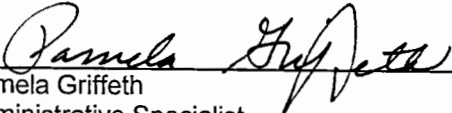
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