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

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY'S MOTION TO COMPEL

The Kansas Power Pool (KPP) hereby states the following in response to the Motion to Compel filed by Southern Pioneer Electric Company (Southern Pioneer).

I. BACKGROUND OF KPP'S PROPOSED KINGMAN DIRECT CONNECTION

1. KPP is a municipal energy agency formed under K.S.A. 12-885, *et seq.* Established in 2004, KPP provides wholesale capacity, energy and transmission services to its members, who are 24 Kansas municipal electric utilities. The City of Kingman, Kansas is one of KPP's members.

2. Kingman county has very little infrastructure in terms of high voltage transmission service. Small portions of Kingman County are served by the very Eastern portion of the Mid-Kansas Electric Company (MKEC) 34.5 kV transmission system (the old Aquila system).[1] In 2005, Kingman constructed about twenty-six miles of 34.5 kV composite core conductor line West out of Kingman, to the town of Cunningham, in order to connect with an Aquila 34.5 kV line that ran about eighteen miles East, out of the Pratt substation. While this new line increased Kingman's

[1] Wheatland Electric Cooperative now operates the main portion of this 34.5 kV Aquila System, a 34.5 kV line that travels north and south through the center of the county. Southern Pioneer owns a few miles of the old Aquila 34.5 kV facilities in Kingman County, all within a couple of miles from the town of Cunningham, on the Western edge of Kingman County.

energy import capability, it does not allow Kingman to import all of the power it needs, meaning Kingman has to self-generate power about five months out of the year.

3. The old Aquila 34.5 kV line to which Kingman is connected with its new 34.5 kV line is now owned and operated by Southern Pioneer. Thus, KPP (on behalf of its member, Kingman) is a wholesale local access customer of Southern Pioneer and currently pays Southern Pioneer approximately $34,000 per month for local access delivery service (LADS) over Southern Pioneer's 34.5 kV line, in order to connect to MKEC's nearby 115 kV Ninnescah line.

4. Several years ago, KPP began studying ways to better meet its obligations to Kingman (as well as its other member cities) and to supply Kingman's full energy needs. KPP determined it could benefit both Kingman and its other KPP members, if Kingman were able to utilize a direct connection from the 34.5 kV line that Kingman constructed to MKEC's nearby Ninnescah 115 kV line, instead of using Southern Pioneer's 34.5 kV line to connect to that Ninnescah line. Under this proposal (known as the Kingman Direct Connection), Kingman would no longer be subject to the 6 MW import limitations on Southern Pioneer's 34.5 kV line under which it now operates. KPP members would also benefit by receiving additional capacity revenue from Kingman and the ability to market 4 MW of generation capacity from Kingman's internal generating units. The Kingman Direct Connection would also create significant cost savings to KPP members, since KPP would not be forced to pay Southern Pioneer's LADS charges for use of the inadequate Southern Pioneer 34.5 kV line to connect to MKEC's Ninnescah 115 kV line.

5. KPP began taking steps to develop and arrange for construction of the Kingman Direct Connection. These steps included submission in 2015 of requests to the Southwest Power Pool and MKEC to change the current Kingman network load local delivery point from the current

delivery point on the Southern Pioneer 34.5 kV line to a new delivery point (which KPP is preparing to construct) on MKEC's Ninnescah 115 kV line.

6. After KPP submitted its interconnection requests for the Kingman Direct Connection to the Southwest Power Pool and MKEC, Southern Pioneer sent KPP a "cease and desist" letter, claiming the Kingman Direct Connection violated a settlement agreement the parties entered in another matter. KPP responded to this letter, noting it does not believe the Kingman Direct Connection violates this agreement.

II. SOUTHERN PIONEER'S COMPLAINT AGAINST KPP'S PROPOSAL

7. Southern Pioneer filed a Complaint against KPP with the Commission on September 9, 2016 (the 17-092 Complaint Docket), alleging the Kingman Direct Connection constitutes an unnecessary and wasteful duplication of facilities and service in Southern Pioneer's certificated territory that is not consistent with the "regulatory compact" and is not in the public interest.[2]

8. Mid-Kansas Electric Company, LLC (MKEC) filed a petition to intervene in the 17-092 Complaint Docket, which was granted on March 30, 2017.

9. The parties conducted significant discovery in the 17-092 Complaint Docket, leaving no stone unturned regarding the Kingman Direct Connection and KPP's position on the need for the same.

[2] Complaint of Southern Pioneer Electric Company against the Kansas Power Pool, p. 1, 17-092 Complaint Docket; Joint Motion to Dismiss Complaint, ¶ 1, 17-092 Complaint Docket.

10. A few days before the evidentiary hearing was scheduled to occur in the 17-092 Complaint Docket, Southern Pioneer filed a motion to dismiss its Complaint without prejudice.[3] This motion was granted, and Southern Pioneer's Complaint was dismissed on May 1, 2018.

III. PROCEDURAL HISTORY OF THIS DOCKET

11. On February 9, 2018, KPP filed an Application pursuant to K.S.A. 66-131(a), for a certificate for transmission rights only for the Kingman Direct Connection. KPP filed testimony in support of its application on May 8, 2018. Southern Pioneer filed a petition to intervene in this matter on April 12, 2018, which was granted. MKEC filed a petition to intervene on May 10, 2018, which was also granted.

12. The parties negotiated a procedural schedule for this matter and jointly filed a motion, requesting the Commission adopt the parties' proposed schedule. The parties jointly requested the Commission set the deadline for Staff and the Intervenors' (Southern Pioneer and MKEC) testimony as July 9, 2018, and the deadline for Staff and Intervenor Cross-Answering Testimony as July 16, 2018. The parties proposed July 30, 2018 as the deadline for KPP's rebuttal testimony, and they proposed August 28-29, 2018 for the evidentiary hearing.[4]

13. On May 15, 2018, Southern Pioneer issued its first set of discovery to KPP, consisting of 33 data requests.

14. On May 21, 2018, KPP served objections to several of Southern Pioneer's data requests, as required by the Discovery Order in this matter.[5]

[3] MKEC and Commission Staff also joined in this Motion.
[4] Joint Motion for Procedural Schedule, filed May 14, 2018.
[5] Per the Order Granting Intervention; Protective Order; Discovery Order, filed May 15, 2018, objections are due within 5 days of the data request, and any objections not provided at that time will be considered waived. ¶ 24.

15. The morning of Wednesday May 23, 2018, Southern Pioneer's counsel requested a telephone conference with KPP's counsel, for that afternoon, to discuss KPP's objections. KPP's counsel rearranged her schedule to accommodate the request, and the parties briefly discussed some of the data requests and objections by telephone. Southern Pioneer agreed to modify some of the data requests based upon the objections. KPP attempted to discuss with Southern Pioneer the information which KPP intended to provide in response to the data requests.

16. Southern Pioneer's counsel demanded KPP notify Southern Pioneer within 24 hours whether KPP would withdraw all of its objections. KPP's counsel notified Southern Pioneer that she would discuss Southern Pioneer's position with KPP, but that KPP's counsel was leaving town for a death in the family, and subsequent funeral on the morning of May 25, 2018, so she would be unable to comply with Southern Pioneer's deadline of 24 hours. KPP's counsel reiterated that KPP would be responding to the non-objectionable portion of the data requests by the deadline of May 30, 2018.

17. Southern Pioneer filed its motion to compel on Friday May 25, 2018.

18. KPP responded to the non-objectionable portion of the data requests on May 30, 2018. These responses are attached hereto as Exhibit A. KPP did not include the documents produced with these responses in this motion, as they are voluminous and have already been provided to Commission Staff when KPP served its responses.

IV. RESPONSE TO MOTION TO COMPEL

19. Southern Pioneer's motion should be denied outright, for failure to negotiate in good faith to resolve this discovery dispute.[6] It should also be denied as moot regarding data

[6] Order Granting Intervention; Protective Order; Discovery Order, filed May 15, 2018, ¶ 24.

requests No. 1, 3, 4, 6, 7, 16-18, 20, 22, 23, 26, and 28, since, despite these requests being objectionable on their face, the non-objectionable portion of those requests have been answered.

20. The requests to which KPP objected do not fall within the relevancy standard articulated in Southern Pioneer's motion.[7] They go well beyond the subject matter under investigation in this proceeding. While Southern Pioneer argued in its Motion to Dismiss in the 17-092 Complaint Docket that the Commission's analysis in this docket would be "more narrowly focused" (which is true), its data requests do not reflect that narrow focus.[8]

21. As each of the data requests at issue are discussed below, it is important to remember that KPP is already legally authorized to operate as a public utility; its wherewithal and qualifications to do so are not at issue in this proceeding. The only issue before the Commission in this docket is whether the Kingman Direct Connection will promote public convenience and necessity.[9] The recent statutory amendments do not expand the Commission's focus into KPP's qualifications to operate as a public utility. Rather, K.S.A. 12-8,111 now simply requires the Commission to apply the provisions of K.S.A. 66-1,170, *et seq.* to KPP's application, to the same extent it would apply those provisions to a similar application by a retail electric supplier.[10] All this means is the Commission must take note of the statutory declaration of public policy set forth in K.S.A. 66-1,170 when considering KPP's application. None of these statements of public policy address KPP's "managerial, technical and financial capability to successfully complete, maintain and operate [the] proposed facility."[11]

[7] Motion to Compel, ¶ 6.
[8] Joint Motion to Dismiss Complaint, ¶ 15, 17-092 Complaint Docket.
[9] K.S.A. 66-131(a).
[10] K.S.A. 12-8,111(a).
[11] K.S.A. 66-1,170; Motion to Compel, ¶ 20.

22. Data Request No. 1: Without waiving its objections, KPP has responded to this request, as amended. Any dispute regarding this request is moot. If the Commission seeks further explanation from KPP regarding its objections, these objections are well-founded, particularly to the original version of this request. The original version sought "all" work papers and documents, as well as "all data" and all "analyses," which, as KPP explained in its brief call with Southern Pioneer, includes drafts, partial or incomplete notes, and other documents which may be initial or only have a very limited, tangential relationship to any position taken in the 89 pages of testimony and exhibits filed by Mr. Holloway. Further, this request, on its face, applies to all of Mr. Holloway's testimony; it did not identify any specific issues or positions. Thus, on its face, it includes testimony regarding Mr. Holloway's background and experience as a witness, as well as testimony he has previously filed before the Commission. Requiring KPP to search for such documents is not a productive use of KPP's time and resources, nor is such a search required under the discovery rules.

23. Data Request No. 3: Without waiving its objections, KPP has responded to this request, as amended. Any dispute regarding this request is moot. If the Commission seeks further explanation from KPP regarding its objections, these objections are well-founded, particularly to the original version of this request. Frankly, KPP told Southern Pioneer on the telephone that it did not understand at all what documents and information this request was seeking. Before Southern Pioneer agreed to amend this request, to limit it to information provided to Commission Staff in meetings which were not attended by Southern Pioneer or MKEC regarding the Kingman Direct Connection, this request was objectionable, on its face. It was not limited in temporal scope or even subject matter, and it included information already in Southern Pioneer and MKEC's possession, so responding would have been unreasonable, cumulative and duplicative.

24. Data Request No. 4: Without waiving its objections, KPP has responded to this request. Any dispute regarding this request is moot. If the Commission seeks further explanation from KPP regarding its objections, these objections are well-founded. As with data request No. 1, the use of the term "all" to modify several very general categories of documents (i.e., "all design, engineering, procurement and construction information, documents, work papers and contracts") renders the request objectionable on its face. This request is not limited in temporal scope, nor to any particular aspect of the Kingman Direct Connection which is at issue in this docket. It strays well beyond the subject matter under investigation in this proceeding, as noted in paragraphs 22 and 23, above. It is nothing more than a fishing expedition, and it is not a productive use of KPP's time to search for documents responsive to this extremely broad request. Indeed, Southern Pioneer complained in the 17-092 Complaint Docket that KPP was too expansive in responding to discovery in that docket, by producing too much information. By the same token, Southern Pioneer's data requests should be more targeted to specific aspects of the project which are at issue in this matter, in order to avoid that criticism in this docket.

25. Data Request No. 6: Without waiving its objection to the breadth of this request, KPP has responded to this request, as amended. Any dispute regarding this request is moot. If the Commission seeks further explanation from KPP regarding its objection that this request was overly broad, KPP felt the temporal scope (going back to 2005) was unnecessarily broad, as was the subject matter ("all economic development opportunities," no matter the size, and the geographic description of the "Kingman vicinity").

26. Data Request No. 7: Without waiving its objections, KPP has responded to this request. Any dispute regarding this request is moot. If the Commission seeks further explanation from KPP regarding its objections, these objections are well-founded because the request sought

"all data, information and documents," which includes data, information and documents which are not related to the matters at issue in this proceeding, and the request is not limited in temporal scope.

27. Data Requests No. 8-13: KPP stands on its objections to these requests, since these requests seek information that is not clearly relevant to the subject matter under investigation in this proceeding. All of these requests seek information relating to KPP's experience and qualifications, which, as explained in paragraphs 22 and 23, above, is not before the Commission. No reasonable interpretation of K.S.A. 66-1,171 includes consideration of the matters at issue in requests No. 8-13.

28. The amendment to K.S.A. 12-8,111 requires the Commission to apply the provisions of K.S.A. 66-1,170, *et seq.* to KPP's application for transmission rights only, *to the same extent it would apply those provisions to a similar application by a retail electric supplier*.[12] Surely, Southern Pioneer is not advocating that the Commission delve deeply into the "managerial, technical and financial capability" of every retail electric supplier or municipal energy agency who files an application for a certificate for transmissions rights only, as such analysis would not only extend well outside the Commission's statutory jurisdiction, but would also unreasonably and needlessly burden the Commission's docket and Staff's workload.

29. Southern Pioneer claims in its motion that the Commission "has always" analyzed the managerial, technical and financial capability of an applicant seeking a certificate for transmission rights only, yet the only citation it offers for this claim is a 2007 Order Approving Stipulation & Agreement and Addressing Application of Statutes in the initial ITC Great Plains,

[12] K.S.A. 12-8,111(a) (emphasis added).

LLC docket.[13] Southern Pioneer's failure to unearth any subsequent orders, addressing issues actually similar to those in this docket, clearly shows Southern Pioneer is unreasonably and unjustifiably stretching the scope of the Commission's inquiry in this docket.

30. The 2007 ITC Order is also inapposite since that docket involved several "novel issues" which significantly shaped the Commission's analysis in that Order.[14] ITC was not simply seeking a certificate for transmission rights only, like KPP, but, instead, was seeking a certificate to transact the business of an electric public utility.[15] KPP is already legally authorized to transact the business of an electric public utility. [16] ITC was also seeking an exemption or waiver from certain statutes and regulations (which KPP is not seeking), and ITC was not seeking approval of a specific project or the right to construct a specific transmission line (which is exactly what KPP is seeking).[17] Further, even if the Commission considered ITC's "managerial, technical and financial capability," (which it does not actually appear the Commission did, but, rather, the Commission simply noted that MKEC requested it do so), such consideration may be appropriate with an unknown, out-of-state entity who has not been certified to transact the business of an electric public utility.[18] It is not required when considering the application of a well-established municipal energy agency such as KPP, who has already been certified to transact the business of an electric public utility. Simply put, the information sought in Southern Pioneer's data requests No. 8-13 is unnecessary and immaterial to the Commission's statutorily-limited charge in this docket. Enlarging the scope of the Commission's review of applications for transmission rights

[13] Motion to Compel, ¶ 20.
[14] Docket No. 07-ITCE-380-COC, Order Approving Stipulation & Agreement and Addressing Application of Statutes, ¶ 9.
[15] *Id.*, at ¶11.
[16] See Paragraph 16 of the Commission's January 9, 2018 Order on Jurisdiction in KCC Docket 18-GIME-217-GIE.
[17] *Id.*
[18] *Id.*, at ¶ 36-37.

only from certified retail electric suppliers and municipal energy agencies, to the extent Southern Pioneer is requesting, is not justified, by fact or law.

31. Data Request No. 16: Without waiving its objections, KPP has responded to this request. Any dispute regarding this request is moot. If the Commission seeks further explanation from KPP regarding its objections, these objections are well-founded because the request sought "any studies, reports or other documentation," which includes data, information and documents which are not clearly related to the matters at issue in this proceeding, and the request is not limited in temporal scope.

32. Data Request No. 17: Without waiving its objections, KPP has responded to this request. Any dispute regarding this request is moot. If the Commission seeks further explanation from KPP regarding its objections, these objections are well-founded because the request was not limited in temporal scope and its purpose is vague. This request addresses Mr. Holloway's statement in his testimony that Southern Pioneer's SemCrude Substation was designed and installed merely to serve Southern Pioneer's SemCrude load. If Southern Pioneer disagrees with this statement, or seeks to disprove it, then Southern Pioneer, as the owner, builder, and operator of the SemCrude Substation, presumably has information and documents in its possession to support its position. Discovery from KPP on this issue is unnecessary.

33. Data Request No. 18: Without waiving its objections, KPP has responded to this request. Any dispute regarding this request is moot. If the Commission seeks further explanation from KPP regarding its objections, these objections are well-founded because the request was not limited in temporal scope, nor was it limited to the Kingman Direct Connection or any issues with Kingman's energy capacity or needs.

34. Data Request No. 20: Without waiving its objections, KPP has responded to this request. Any dispute regarding this request is moot. If the Commission seeks further explanation from KPP regarding its objections, these objections are well-founded because the request was overly broad in temporal scope (seeking capacity sales contracts since May 3, 2013) and it is unclear how KPP's past capacity sales contracts are relevant to the matters in this docket. Southern Pioneer does not explain the relevance of this request in its motion but, rather, refers to its explanation to support a different request. There is no dispute in this docket that, under the current constraints Southern Pioneer has placed on the 34,5 kV line at issue, KPP cannot sell Kingman's excess capacity. Thus, this request seeks information that is irrelevant and unnecessary.

35. Data Request No. 22: Without waiving its objections, KPP has responded to this request. Any dispute regarding this request is moot. If the Commission seeks further explanation from KPP regarding its objections, these objections are well-founded because it seeks publically-available information. This request asks for the market value in the SPP market for excess generation capacity, which is information that is just as available to Southern Pioneer as it is to KPP. The request is unnecessary.

36. Data Request No. 23: Without waiving its objections, KPP has responded to this request. Any dispute regarding this request is moot. If the Commission seeks further explanation from KPP regarding its objections, these objections are well-founded because the request includes the catch-all sentence seeking "all supporting data, information and documents," which is impermissibly broad.

37. Data Request No. 26: Without waiving its objections, KPP has responded to this request. Any dispute regarding this request is moot. If the Commission seeks further explanation from KPP regarding its objections, these objections are well-founded because the request is not

limited in temporal scope and it is awkwardly-phrased, making at least a portion of it confusing and impossible to answer. Mr. Holloway's statement at issue in this request addresses future retail electric service, but the request seeks information regarding current customers.

38. Data Request No. 28: KPP's objections to this request are well-founded, since it is improper cross-examination and argumentative. The answer to this request is not material to any issue before the Commission in this docket, and it is unnecessary. It is simply a snarky attempt to twist KPP's position in this matter, and is not the proper subject of discovery.

39. Data Request No. 33: Without waiving its objections, KPP has responded to sections (e) and (f) of this request. Any dispute regarding the requests in these sections is moot. The remainder of the request seeks information which is not material or relevant to the issues in this docket, as explained in paragraphs 20-21 and 27-30, above.

V. CONCLUSION

Southern Pioneer's motion is improper and largely moot. It does not comply with the discovery order issued in this docket, and the objections at issue are well-founded. KPP requests that it be denied.

Respectfully submitted:

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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 Response and 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 31st day of May, 2018.

Notary Public

My Appointment Expires:

LINDA LE
Notary Public - State of Kansas
My Appt. Expires April 19, 2022

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of May, 2018, Kansas Power Pool's Response to Southern Pioneer Electric Company's Motion to Compel was served via electronic mail to:

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KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #1

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
Referring to the Direct Testimony of Mr. Larry Holloway filed in the above-referenced matter, please provide all work papers and documents relied on by the witness to calculate and/or support the position(s) taken therein. Your response should include all data, analyses, and spreadsheets (with formulas intact and all linked spreadsheets included).

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22. Kansas Power Pool further objects to this request because it is overly broad, vague, and does not identify with reasonable particularity the information or documents sought. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, see KPP's response to Staff Data Requests No. 7 and 8.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

Exhibit A

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #2

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:

Please provide a copy of all data request responses issued in this docket. Please update this data request as responses are issued.

Response:

KPP has already provided the requested information.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #3

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:

Please provide a copy of all information not subject to attorney-client or other privilege distributed to parties in this proceeding during meetings, via emails, or other forms of informal discovery requests. Please update this data request when information is distributed to other parties in this docket.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22. Kansas Power Pool further objects to this request because it is overly broad, ambiguous, vague, and does not identify with reasonable particularity the information or documents sought. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, and based upon Southern Pioneer's oral amendment to this question wherein Southern Pioneer's counsel stated this request is seeking any documents distributed in any meetings KPP may have had with Commission Staff which were not attended by the other parties to this docket, KPP is producing documents it provided to Commission Staff during meetings in March 2016 and September 2015.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #4

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:

Please provide all design, engineering, procurement and construction information, documents, work papers and contracts for the Kingman Direct Connection project not otherwise provided as part of the Direct Testimony of Larry W. Holloway.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22. Kansas Power Pool further objects to this request because it is overly broad, ambiguous, vague, and does not identify with reasonable particularity the information or documents sought. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:
Without waiving the objections stated above, information relevant to the matters at issue in this docket has been provided as Appendix B of Exhibit LWH-3

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #5

Company Name Kansas Power Pool

Docket Number 18-KPPE-343-COC

Request Date May 15, 2018

Response Date May 30, 2018

Please Provide the Following:
Regarding the Direct Testimony of Larry W. Holloway, p. 4, line 9 through p. 6, line 13:

a. Please confirm that the cost of KPP Local Access Delivery Service (LADS) charges assessed to KPP under Southern Pioneer's LADS tariff for service over Southern Pioneer's 34.5 kV system are recovered from or socialized among all KPP Members. If that is not the case, please explain how these specific costs are recovered by KPP from its Members. Please provide all data, information and documents to support your answer provided herein.
Response:
Confirmed. See Exhibit LWH-2

b. Please provide KPP's rates charged to its members for years 2016, 2017, 2018.
Response:
See page 2 of Exhibit LWH-2 for the years 2018 through 2027

		2016	2017
Capacity Demand Rate	$/kW-mo	$11.01	$11.01
Transmission Demand Rate	$/kW-mo	$6.42	$6.03
A&G Demand Rate	$/kW-mo	$1.85	$2.12
Energy Rate	$/MWH	$28.19	$31.46
Overall Average Energy Costs	$/MWH	$67.87	$71.23
RICE DNR Project	$/kW-mo	$0.21	$0.25

c. Please provide KPP's projected rates to its members for year 2019 and 2020.

Response:
See response to b, above.

Submitted By: Kansas Power Pool

Submitted To: Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #6

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
Regarding the Direct Testimony of Mr. Larry Holloway, p. 24, please provide a list of all economic development opportunities lost in the Kingman vicinity since 2005 as a result of transmission service.

Objections:

Kansas Power Pool objects to this request because it is overly broad. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, KPP is not currently aware of any specific economic development opportunities which have been lost. It is KPP's understanding that Kingman has not actively sought load driven economic development because it is concerned that the existing transmission service provides limits that, combined with local generation, will only allow it to serve its existing industrial customers and their load growth. Additionally, see the Direct Testimony of Kenneth A. Kriz filed August 7, 2017 in KCC Docket No. 17-KPPE-092-COM.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #7

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
Regarding the Direct Testimony of Larry W. Holloway, p. 24, lines 3–6 and p. 30, lines 3-5:

a. What is the total demand the KPP Direct Connection facilities will be planned to serve?
Response: Without waiving the objections stated below, because KPP will be using standard transformer sizes, the facility could serve up to 28 MVA with forced cooling of the transformer and 15 MVA with self-cooling.

b. Will the KPP Direct Connection be planned and built to serve other potential wholesale loads in addition to the City of Kingman? Please provide all data, information and documents to support your answer provided herein.
Response: Without waiving the objections stated below, No. However, KPP and the City of Kingman stand ready to serve any requesting wholesale customers under the SPP OATT, as discussed in the referenced testimony.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22. Kansas Power Pool further objects to this request because it is overly broad, ambiguous, vague, and does not identify with reasonable particularity the information or documents sought. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #8

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
State what entity will construct the Kingman Direct Connection facilities.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, KPP will be responsible for the construction of the Kingman Direct Connection facilities. However, the identity and qualifications of KPP's contractors, engineers, operators, or maintenance providers is not relevant to this proceeding. KPP already has a certificate in Kansas to provide transmission service, granted under the municipal energy act. The only relevant issue in this docket is whether or not the proposed certificate for transmission rights only is in the public interest. It is already presumed under Kansas law that a legally formed municipal energy agency, such as KPP, may provide transmission service.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #9

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
State who in KPP will operate and maintain the proposed 34.5 kV line and 115-34.5 kV substation for the Kingman Direct Connection? If not someone in KPP, please state who will be performing those functions.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, KPP will be ultimately responsible for the operation and maintenance of the Kingman Direct Connection facilities. However, the identity and qualifications of KPP's contractors, engineers, operators, or maintenance providers is not relevant to this proceeding. KPP already has a certificate in Kansas to provide transmission service, granted under the municipal energy act. The only relevant issue in this docket is whether or not the proposed certificate for transmission rights only is in the public interest. It is already presumed under Kansas law that a legally formed municipal energy agency, such as KPP, may provide transmission service.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #10

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:

State who in KPP will perform NERC compliance functions for the proposed 115-34.5 kV substation for the Kingman Direct Connection? If not someone in KPP, please state who will be performing those functions.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, KPP states the identity and qualifications of KPP's contractors, engineers, operators, or maintenance providers is not relevant to this proceeding. KPP already has a certificate in Kansas to provide transmission service, granted under the municipal energy act. The only relevant issue in this docket is whether or not the proposed certificate for transmission rights only is in the public interest. It is already presumed under Kansas law that a legally formed municipal energy agency, such as KPP, may provide transmission service.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #11

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:

State who in KPP will perform safety and compliance training for personnel operating and maintaining the proposed 34.5 kV line and 115-34.5 kV substation for the Kingman Direct Connection? If not someone in KPP, please state who will be performing those functions.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, KPP states the identity and qualifications of KPP's contractors, engineers, operators, or maintenance providers is not relevant to this proceeding. KPP already has a certificate in Kansas to provide transmission service, granted under the municipal energy act. The only relevant issue in this docket is whether or not the proposed certificate for transmission rights only is in the public interest. It is already presumed under Kansas law that a legally formed municipal energy agency, such as KPP, may provide transmission service.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #12

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
For those individuals identified to perform the operation, maintenance, compliance and safety training in response to Data Request No. 11, please provide their background and experience in performing those functions.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, KPP states the identity and qualifications of KPP's contractors, engineers, operators, or maintenance providers is not relevant to this proceeding. KPP already has a certificate in Kansas to provide transmission service, granted under the municipal energy act. The only relevant issue in this docket is whether or not the proposed certificate for transmission rights only is in the public interest. It is already presumed under Kansas law that a legally formed municipal energy agency, such as KPP, may provide transmission service.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #13

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
Who will own the 34.5 kV line for the Kingman Direct Connection? Who will own the low side and the high side of the proposed substation for the Kingman Direct Connection?

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, KPP. Further, the identity and qualifications of KPP's contractors, engineers, operators, or maintenance providers is not relevant to this proceeding. KPP already has a certificate in Kansas to provide transmission service, granted under the municipal energy act. The only relevant issue in this docket is whether or not the proposed certificate for transmission rights only is in the public interest. It is already presumed under Kansas law that a legally formed municipal energy agency, such as KPP, may provide transmission service.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #14

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:

On page 7, lines 5-7 of Mr. Holloway's testimony, Mr. Holloway states that as to the border area systems "…neither of these systems are well equipped to provide robust electric transmission system." Please explain the reason they are ill equipped and provide the support for Mr. Holloway's conclusion.

Response:

See discussion on p.6 l.16 through p.13 l.14 of Holloway's testimony.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #15

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:

On page 7, lines 13-16 of Mr. Holloway's Direct Testimony, Mr. Holloway states that Kingman at its own expense constructed the 26 miles of 34.5 kV radial line to the town of Cunningham. Is it KPP's opinion that someone other than Kingman should have paid for the line? If so, who and why?

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22. Kansas Power Pool further objects to this request because it is ambiguous, vague, argumentative, and constitutes improper cross examination. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

KPP stands on the objections stated above.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #16

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
On page 12, lines 13-15 of Mr. Holloway's Direct testimony, Mr. Holloway states that the upgrade to line from Pratt to Cunningham would have "…resulted in an unusually long low voltage line providing poor transmission connectivity to Kingman." Please provide any studies, reports or other documentation to support Mr. Holloway's conclusion the line would have provided poor transmission connectivity to Kingman.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22. Kansas Power Pool further objects to this request because it is overly broad, ambiguous, vague, and does not identify with reasonable particularity the information or documents sought. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:
Without waiving the objections stated above, KPP states that in 2013, KPP and Southern Pioneer both sponsored a study by Burns and McDonnel to analyze voltage problems and harmonics at the Cunningham regulator station if up to 10.5 MW was delivered from the Pratt substation to the 34.5 kV line to Cunningham, where the Kingman line is currently connected. Both KPP and Southern Pioneer paid for this study and shared the results with each other, the City of Kingman and MKEC. See attached email.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #17

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
On page 14, lines 6-12 of Mr. Holloway's Direct Testimony, Mr. Holloway states the Southern Pioneer SemCrude Substation was designed and installed merely to serve Southern Pioneer's SemCrude load. Please provide all support for Mr. Holloway's conclusion.

Objections:

Kansas Power Pool objects to this request because it is overly broad, ambiguous, vague, and does not identify with reasonable particularity the information or documents sought. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:
Without waiving the objections stated above, KPP references p.41, l.1 through p.42, l.9 of the Direct Testimony of Larry W. Holloway filed August 7, 2017 in KCC Docket No. 17-KPPE-092-COM.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #18

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
Please provide the total capacity KPP has available, the total needed to meet its SPP reserve capacity requirements, the total of its excess capacity, and location and resources making up the total available capacity.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22. Kansas Power Pool further objects to this request because it is overly broad, ambiguous, vague, and does not identify with reasonable particularity the information or documents sought. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, see the attached KPP 2018 SPP resource adequacy workbook as filed.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #19

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
For purposes of meeting KPP's capacity reserve requirement, please state what KPP's considers its peak load is for purposes of setting its reserve requirement.

Response:

See KPP's response to Data Request 18.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #20

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
Please provide all capacity sales contracts KPP has entered into since May 3, 2013 for sale of KPP's excess capacity.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22. Kansas Power Pool further objects to this request because it is overly broad, ambiguous, vague, and does not identify with reasonable particularity the information or documents sought. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, see attached capacity sales contracts from KPP to KMEA and OPPD.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #21

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
Please provide documentation showing that all 5 Kingman generators are registered in the SPP Integrated Marketplace along with the corresponding capacity ratings.

Response:

See SPP monthly market settlement sheets KPP provided in response to Staff Data Request 6.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #22

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
On page 16, lines 11-13 of Mr. Holloway's Direct Testimony, Mr. Holloway states the current value of excess generation capacity is over $2.00/kW-month. Please provide all support for the conclusion the market value in the SPP market is in excess of $2.00/kW-month and what the market value is in the SPP market.

Objections:

Kansas Power Pool objects to this request because it is overly broad, ambiguous, vague, and does not identify with reasonable particularity the information or documents sought. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, KPP states this is based upon KPP's discussions with its facilitator, Tenaska Power Services, and counterparties in SPP. Also see response to Data Request 20

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #23

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
On page 20, lines 2-14 of Mr. Holloway's Direct Testimony, Mr. Holloway states that in certain instances Kingman does not receive compensation for startup costs due to import limitations. Please advise as to the number of incidents in which the Kingman could have received startup costs in the last 12 months but did not due to import limitations. Please provide all supporting data, information and documents.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22. Kansas Power Pool further objects to this request because it is overly broad, ambiguous, vague, and does not identify with reasonable particularity the information or documents sought. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:
Without waiving the objections stated above, see KPP's response to Staff Data Request 6.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #24

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:

On page 24, lines 12-14 of Mr. Holloway's Direct Testimony, Mr. Holloway states that if the Kingman Direct Connection is denied "there will simply be no improvement in transmission service in this area for the foreseeable future." Please provide the support for Mr. Holloway's conclusion.

Response:

See discussion on p.23, l.13 through p.28, l.28 of Larry Holloway's Direct Testimony. Also, KPP participates in MKEC, Westar and SPP planning discussions and this conclusion is based upon KPP's knowledge from these discussions.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY INFORMATION REQUEST #25

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
On page 24, lines 14-16 of Mr. Holloway's Direct Testimony, Mr. Holloway states that "…the SPEC Project would limit the ability of any local development of small generation resources on the lower voltage transmission lines in the area." Please provide the support for Mr. Holloway's conclusion.

Response:

See discussion on p.16, l.1 through l.16 of Larry Holloway's Direct Testimony.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #26

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:

On page 24, lines 19-20 of Mr. Holloway's Direct Testimony, Mr. Holloway states that granting the application is the only near-term solution that assures future retail electric service in the area can be adequately served. Please provide the support for Mr. Holloway's conclusion and list all electric customers Mr. Holloway is referring to as not being adequately served in the area.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22. Kansas Power Pool further objects to this request because it is overly broad, ambiguous, vague, and does not identify with reasonable particularity the information or documents sought. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, see Larry Holloway's Direct Testimony p.23, l.13 through p.25, l.2.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #27

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
On page 25, lines 10-11 of Mr. Holloway's Direct Testimony, Mr. Holloway states the Pratt to Cunningham facilities were never constructed to serve the City of Kingman. Please provide the support for Mr. Holloway's conclusion.

Response:

See Larry Holloway's Direct Testimony p.25, l.3 through p.28, l.18 and the associated footnotes.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #28

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:

On page 26, lines 12-14 of Mr. Holloway's Direct Testimony, Mr. Holloway states that all the revenue received for this limited, inadequate 34.5 kV service to Kingman has been like new found money for SPECo. Does KPP believe that it should receive the current 34.5 kV local access delivery services without compensation to SPECo?

Objections:

Kansas Power Pool objects to this request because it is argumentative and improper cross examination and is also ambiguous and vague. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, see KPP's response to Data Request 27.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #29

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
On page 28, lines 6-8 of Mr. Holloway's testimony, Mr. Holloway states that the policies of SPECo create waste. Please identify what specific SPECo policies Mr. Holloway is referring to which create waste.

Response:

See KPP's response to Data Response 27.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #30

Company Name Kansas Power Pool

Docket Number 18-KPPE-343-COC

Request Date May 15, 2018

Response Date May 30, 2018

Please Provide the Following:
On page 32, lines 1-4 of Mr. Holloway's Direct Testimony, Mr. Holloway states that the characteristics of the service "limit the full utilization of many megawatts of additional generation throughout the state on MKEC's members' 34.5 kV system." Please provide the support for Mr. Holloway's conclusion. Also, please provide what specific megawatts of additional generation is not being fully utilized as Mr. Holloway suggests.

Response:

The following list was prepared by examination of MKEC lower voltage drawings and KMU information, as well as KPP information. There could be additional generation that is not counted on the MKEC lower voltage system. The net result is 106 MW of generation capacity. At a replacement cost of $1,000/kW this would require over $100,000,000 to replace with new generation capacity:

City/entity	**MKEC Member**	**No of units**	**Total MW**
Greensburg Wind Farm	SPEC	10	12.5
Kingman	SPEC	6	17.9
Meade	SPEC	5	8.1
Ashland	SPEC	5	4
Stockton	Prairie Land	5	6.3
Osborne	Prairie Land	6	7.1
Washington	Prairie Land	7	9.1
Lincoln	Western	6	10.4
Hoisington	Western	4	14
Beloit	Western	6	16.6
Total Estimate			**106**

Submitted By: Kansas Power Pool

Submitted To: Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #31

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
Regarding the Direct Testimony of Larry W. Holloway, Exhibit LWH-3:

a. Please confirm the list of materials and equipment and associated costs listed in Exhibit LWH-3 are all items, equipment, materials and costs necessary for the total Kingman Direct Connection project. If there are additional items, material, equipment and costs for the project, please provide a listing of such additional items, material, equipment and costs.

b. If there are no additional items, material, equipment or costs necessary for the Kingman Direct Connection project, please confirm that the total estimated cost of the KPP Direct Connection project is $2,683,775.00 as listed on p. 5 of Exhibit LWH-3.

Response:

See Exhibit LWH-3, which speaks for itself.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #32

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:
Regarding the Direct Testimony of Larry W. Holloway, Exhibit LWH-3:

Please state what KPP determined to be the costs of the high side of the substation for the Kingman Direct Connection.

Response:

See KPP's Response to Data Request 31.

Submitted By:	Kansas Power Pool
Submitted To:	Southern Pioneer Electric Company

KANSAS POWER POOL RESPONSE TO SOUTHERN PIONEER ELECTRIC COMPANY
INFORMATION REQUEST #33

Company Name	Kansas Power Pool
Docket Number	18-KPPE-343-COC
Request Date	May 15, 2018
Response Date	May 30, 2018

Please Provide the Following:

a. Has KPP secured the real estate interest necessary to construct, own, operate and maintain the 115-34.5 kV Substation for the Kingman Direct Connection? If so, please provide the total cost of the acquisition of the real property interest and all data, information and documents to support your answer provided herein.

b. Has KPP secured all licenses, permits, and approvals necessary to construct, own, operate and maintain the 115-34.5 kV Substation and 34.5 kV line for the Kingman Direct Connection? Please provide all documentation and information to support your answer herein.

c. Please state how many miles of its proposed 34.5 kV line KPP intends to construct, own, operate and maintain on public right-of-way.

d. For the portion of 34.5 kV line which KPP intends to construct, own, operate and maintain on private right-of-way, has KPP secured the necessary rights-of-way? If so, please provide the cost of the rights-of-way and all information, data and documents to support your answer herein.

e. Please indicate the number of circuit miles the proposed 115-34. kV substation will be interconnected, to the existing Ninnescah 115 kV line, from the existing SemCrude 115/34.5 kV substation.

f. Please indicate the number of circuit miles the proposed 34.5 kV line will be interconnected, to the existing Kingman 34.5 kV line, from the existing Cunningham 34.5 kV substation.

Objections:

Kansas Power Pool objects to this request because it seeks information that is not clearly relevant to the proceedings in this docket and is unduly burdensome. *See* K.A.R. 82-1-234a (a) & May 15, 2018 Discovery Order entered in this docket, ¶ 22. Kansas Power Pool further objects to this request

because it is overly broad, ambiguous, vague, and does not identify with reasonable particularity the information or documents sought. *See* May 15, 2018 Discovery Order entered in this docket, ¶ 22.

Response:

Without waiving the objections stated above, the identity and qualifications of KPP's contractors, engineers, operators, or maintenance providers is not relevant to this proceeding. KPP already has a certificate in Kansas to provide transmission service, granted under the municipal energy act. The only relevant issue in this docket is whether or not the proposed certificate for transmission rights only is in the public interest. It is already presumed under Kansas law that a legally formed municipal energy agency, such as KPP, may provide transmission service. In response to (e), KPP states the proposed 115/34.5 kV substation will be approximately 1 mile west of the SemCrude substation. See application in this proceeding. In response to (f), the Proposed 34.5 kV line will interconnect with Kingman's 34.5 kV line, not the Cunningham 34.5 kV substation. See application in this proceeding.

Submitted By: Kansas Power Pool

Submitted To: Southern Pioneer Electric Company

Verification of Responses

I have read the foregoing Information Requests and objections thereto and find the objections and responses 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 Southern Pioneer Electric Company any matter subsequently discovered which affects the accuracy or completeness of the responses to these Information Requests.

Signed: /s/ [signature]

Date: 5/29/2018