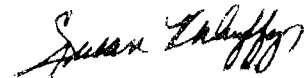


THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

JAN 29 2009



Before Commissioners: Thomas E. Wright, Chairman
Michael C. Moffet
Joseph F. Harkins

In the Matter of a General Investigation Into)
the Commission's Consideration of the)
Public Utility Regulatory Policy Act's) Docket No. 09-GIME-360-GIE
Electric Standards as Implemented in the)
Energy Independence and Security Act of)
2007.)

COMMENTS OF THE CITIZENS' UTILITY RATEPAYER BOARD

The Citizens' Utility Ratepayer Board (CURB) files the following comments pursuant to the Kansas Corporation Commission (Commission) Order of December 16, 2008, in the above-captioned docket:

I. General Comments

1. As a general statement, CURB supports energy conservation and efficiency efforts and believes the Commission has embraced and encouraged energy efficiency efforts in Kansas. Further, CURB believes that orders made by the Commission in Docket Nos. 08-GIMX-441-GIV and 08-GIMX-442-GIV ("441" and "442"), are in compliance with the three stated purposes of PURPA Title I, which are to (1) promote conservation of energy by utility customers, (2) encourage optimal efficiency of electric utility facilities and resources, and (3) to require equitable rates for electric customers.

II. Specific Comments

2. The following additional comments are offered to certain of the Commission questions:

Question I A. With regard to each of the standards cited above, does federal law permit prior state action for compliance?

Response: If this question is asking whether prior actions of the Commission may satisfy the requirements of PURPA, CURB believes they may, so long as they furthered the purposes of the most current version of the Act, set forth procedures and policies for implementation of the stated goals of the Act, and do not explicitly contradict its requirements or impede its purposes. While the Act grants broad discretion to the Commission in implementation of its requirements, it appears to require that the Commission support its decision not to take action. The Commission may justifiably decline to act by explaining that it has already addressed the standards and complied with the requirements in a prior proceeding, and provide evidence that the prior proceeding meets all relevant requirements of the Act or substantially furthers its stated purposes.

Question I B. If federal law permits prior state action to constitute compliance for a standard, have Commission considerations and decisions in any prior docket or dockets been sufficient to meet the grandfathering requirements to constitute compliance for any such standard such that the requirement to consider the standard is waived?

Response: CURB believes, with the exception of the standards concerning the consideration of smart grid investments, the Commission has substantially complied with the requirements of the Act. Staff has identified the relevant dockets. Furthermore, a liberal interpretation of the Act's grant of broad discretion to the Commission in complying with the Act

might permit the Commission to consider itself within compliance of this section, as well. The parties in 441 or 442? were free to raise concerns about smart grid investments, and no one did. The Commission might reasonably decline to set forth standards at this time on the basis that the stakeholders in Kansas had an opportunity to ask the Commission to consider smart grid investments, but expressed more concerns about traditional grid investments, as evidenced by legislative proposals, KETA activities and several ongoing dockets at the KCC. By establishing a procedure to review this decision at an appropriate interval, the KCC will have made a reasonable decision that is supported by current circumstances in Kansas. However, a narrower interpretation of the Act would call for the Commission to open a docket to specifically consider smart grid investments.

Question II A. With regard to the two standards pertaining to smart grids:

(1) Do utilities limit the amount of smart grid investments due to concerns investments may not be completely recovered? –

Response: No. CURB can find no evidence in past Commission decisions that denied a utility cost recovery for prudently-incurred capital investments. In fact, there is no evidence whatsoever that public utility commissions are unwilling to permit utilities to recover their reasonable and prudent investments in technology that is necessary to serve their customers or that improves the quality of service in ways that justify the expenditure. If the utilities are not making investments in “smart grid” technologies, the primary reason is that there is no consensus as yet as to what a “smart grid” is and what it will do.

Additionally, utilities are no doubt aware that making a commitment to converting the

current grid to a “smart” grid is a massive and incredibly expensive undertaking that may not be qualify as a reasonable and prudent investment that is necessary to provide safe and reliable service. It is also likely that utilities recognize that forcing their customers to pay for a smart grid AND absorb the loss of their investment in the current transmission system would place an economic burden on customers that they can’t possibly bear without undue hardship, even if the utilities are confident that their request for full recovery would be approved.

(2) Are there procedures already in place that address the possibility of replacing existing long-lived technology due to obsolescence? If so, what impact will smart grid investments have on these procedures?

Response: As previously stated, CURB does not find that any previous Commission decision would discourage utilities from making sensible improvements. In reality, utilities address the problem of obsolescence of technology on an on-going basis: computers are upgraded, transmission lines replaced with higher-grade materials, generation equipment is retrofitted with improved components, environmental remediation equipment is replaced or modified, etc. The costs of such improvements are routinely recovered from ratepayers.

However, the massive overhaul of the nation’s transmission system, if accomplished, will of necessity be initiated and accomplished through the exercise of Congressional will. It makes no sense to build the “smart grid” (whatever that turns out to be) from the bottom up, utility-by-utility: that’s what made our national grid such an inefficient patchwork quilt of poorly-connected systems in the first place. Just as the construction of a comprehensive interstate highway system required Congressional action and massive commitment of federal dollars, the rebuilding of our nation’s transmission system will, too.

Until there is a national consensus on the necessity of rebuilding the grid and a national plan for how it should be accomplished (and financed), it makes no sense whatsoever for a utility to invest now in smart grid technologies that soon may be rendered obsolete by that plan. The states and their utility commissions will no doubt be involved in implementing the national plan on a local level, but CURB sees no reason for concern that current regulatory regimes cannot be utilized or adapted for that purpose.

Question III A. Parties are requested to provide comments as to what precise issues with regard to each standard should be addressed in this investigation, preliminary comments as to what Commission action should be undertaken on each standard, and any additional preliminary comments they believe will assist the Commission in consideration of these standards.

Response: CURB believes that the orders set forth by the Commission in the 441 and 442 dockets adequately address the standards set forth in EISA Section 532, therefore requiring no further Commission action.

CURB recognizes that the Commission has not explicitly addressed the Smart Grid standards as set forth in EISA Section 1307. However, during the 441 and 442 workshops and collaborative sessions, utilities and other intervening parties were given an opportunity to discuss various energy conservation and efficiency technologies. If Smart Grid technology, including the use of “smart meters”, is necessary to encourage energy conservation and efficiency in Kansas, it would have been discussed in a previous session.

Question III B. What prior Commission decisions or Kansas legislation should be considered


with regard to each standard in this proceeding? Do any of these decisions, or any prior legislation, constitute adoption or implementation of a comparable standard or portion of a standard?

Response: As previously mentioned, CURB believes that the proceedings and orders issued in the 441 and 442 dockets are adequate to meet the standards as required by PURPA Title I.

Question III C. Parties should also comment on what procedure they believe would be most useful to address the issues.

Response: As previously stated, CURB believes prior Commission action is adequate to meet the standards as required by the EISA and PURPA Title I. However, if the Commission elects to investigate one or more topics as described by PURPA, conducting workshops and collaborative sessions is the best way to address the issues.

Respectfully submitted,



Niki Christopher #19311
David Springe #15619
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
(785) 271-3200
(785) 271-3116 Fax

CERTIFICATE OF SERVICE

09-GIME-360-GIE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 29th day of January, 2009, to the following:

ERNEST KUTZLEY, KS ADVOCACY DIRECTOR
AARP
555 S KANSAS AVE STE 201
TOPEKA, KS 66603
Fax: 785-232-8259
ekutzley@aarp.org

MAX OTT, MANAGER
ALFALFA ELECTRIC COOPERATIVE, INC.
GENERAL OFFICE
121 E. MAIN STREET
PO BOX 39
CHEROKEE, OK 73728-0039
Fax: 580-596-2464
aec@akslc.net

JAMES G. FLAHERTY, ATTORNEY
ANDERSON & BYRD, L.L.P.
216 SOUTH HICKORY
PO BOX 17
OTTAWA, KS 66067
Fax: 785-242-1279
jflaherty@andersonbyrd.com

BOB HALL, GENERAL MANAGER
ARK VALLEY ELECTRIC COOP., ASSN., INC.
GENERAL OFFICE
P. O. BOX 1246
HUTCHINSON, KS 67504
Fax: 620-665-0148
bhall@arkvalley.com

DOUGLAS C. WALTHER, SR ATTORNEY
ATMOS ENERGY CORPORATION
P O BOX 650205
DALLAS, TX 75265-0205
douglas.walther@atmosenergy.com

~~ATMOS ENERGY CORPORATION
PENN CENTER
SUITE 1800
1301 PENNSYLVANIA ST
DENVER, CO 80203-5015~~

RICK D CHAMBERLAIN
BEHRENS TAYLOR WHEELER & CHAMBERLAIN
6 NE 63RD ST, STE 400
OKLAHOMA CITY, OK 73105
Fax: 405-848-3155
rdc_law@swbell.net

MATTHEW DAUNIS, DIRECTOR, ENERGY EFFICIENCY PROGRAMS
BLACK HILLS/KANSAS GAS UTILITY COMPANY, LLC
D/B/A BLACK HILLS ENERGY
110 E 9TH
LAWRENCE, KS 66044
matt.daunis@blackhillscorp.com

LARRY W HEADLEY, DIRECTOR REGULATORY SERVICES
BLACK HILLS/KANSAS GAS UTILITY COMPANY, LLC
D/B/A BLACK HILLS ENERGY
BLACK HILLS UTILITY HOLDINGS INC
1815 CAPITOL AVE
OMAHA, NE 68102
larry.headley@blackhillscorp.com

MARGARET A MCGILL, REGULATORY MANAGER
BLACK HILLS/KANSAS GAS UTILITY COMPANY, LLC
D/B/A BLACK HILLS ENERGY
BLACK HILLS UTILITY HOLDINGS INC
1815 CAPITOL AVE
OMAHA, NE 68102
Fax: 402-829-2501
margaret.mcgill@blackhillscorp.com

KENNETH J. MAGINLEY, MANAGER
BLUESTEM ELECTRIC COOPERATIVE, INC.
524 DEXTER
DISTRICT OFFICE
P.O. BOX 513
CLAY CENTER, KS 67432
Fax: 785-632-5164

KENNETH J. MAGINLEY, MANAGER
BLUESTEM ELECTRIC COOPERATIVE, INC.
614 EAST U.S. HIGHWAY 24
PO BOX 5
WAMEGO, KS 66547-0005
Fax: (785) 456-2003

CERTIFICATE OF SERVICE

09-GIME-360-GIE

RODNEY V. GERDES, MANAGER
BROWN-ATCHISON ELEC. COOP. ASSN., INC.
1712 CENTRAL
P.O. BOX 230
HORTON, KS 66439
Fax: 785-486-3910

KIRK THOMPSON, MANAGER
C. M. S. ELECTRIC COOPERATIVE, INC.
509 E CARTHAGE
P O BOX 790
MEADE, KS 67864-0790
Fax: 620-873-5303
cms@cmsselectric.com

ALLEN A. ZADOROZNY, MANAGER
CANEY VALLEY ELEC. COOP. ASSN., INC.
401 LAWRENCE
PO BOX 308
CEDAR VALE, KS 67024
Fax: 620-758-2926
cve@caneyvalley.com

JERRY JARRETT, MANAGER
DONIPHAN ELECTRIC COOP. ASSN, INC.
PO BOX 699
101 N MAIN
TROY, KS 66087
Fax: 785-985-2298

WILLIAM L. GIPSON, PRESIDENT / CEO
EMPIRE DISTRICT ELECTRIC COMPANY
602 S JOPLIN AVE (64801)
PO BOX 127
JOPLIN, MO 64802
Fax: 417-625-5169

KELLY WALTERS, VICE PRESIDENT
EMPIRE DISTRICT ELECTRIC COMPANY
602 S JOPLIN AVE (64801)
PO BOX 127
JOPLIN, MO 64802
Fax: 417-625-5173
kwalters@empiredistrict.com

ERNEST J. BARKER, MANAGER
BUTLER RURAL ELECTRIC COOPERATIVE ASSN., INC
216 S VINE STREET
PO BOX 1242
ELDORADO, KS 67042
Fax: 316-321-9980

GLENDA CAFER, ATTORNEY
CAFER LAW OFFICE, L.L.C.
2921 SW WANAMAKER DR
STE 101
TOPEKA, KS 66614
Fax: 785-271-9993
gcafer@sbcglobal.net

DONALD HELLWIG, MANAGER
D.S.& O. RURAL ELEC. COOP., ASSN, INC.
129 WEST MAIN ST
P.O. BOX 286
SOLOMON, KS 67480-2086
Fax: 785-655-2805

ED GRAY, VP OF REGULATORY AFFAIRS
ELSTER INTEGRATED SOLUTIONS
706 BRANNOCK TERRACE
ANNAPOLIS, MD 21401
ed.gray@us.elster.com

SHERRY MCCORMACK
EMPIRE DISTRICT ELECTRIC COMPANY
602 S JOPLIN AVE (64801)
PO BOX 127
JOPLIN, MO 64802
Fax: 417-625-5169
smccormack@empiredistrict.com

ROBERT E. REECE, MANAGER
FLINT HILLS RURAL ELECTRIC COOP. ASSN., INC.
PO BOX B
1564 SOUTH 1000 ROAD
COUNCIL GROVE, KS 66846
Fax: 620-767-6311
robertr@flinthillsrec.com

CERTIFICATE OF SERVICE

09-GIME-360-GIE

ROBERT A. FOX, ATTORNEY
FOULSTON & SIEFKIN LLP
BANK OF AMERICA TOWER, SUITE 1400
534 SOUTH KANSAS AVENUE
TOPEKA, KS 66603-3436
Fax: 785-233-1610
bfox@foulston.com

CHARLES J. WOODIN, ATTORNEY
FOULSTON & SIEFKIN LLP
1551 NORTH WATERFRONT PKWY
SUITE 100
WICHITA, KS 67206-4466
Fax: 316-267-6345
cwoodin@foulston.com

DALE COOMES, CEO
HEARTLAND RURAL ELECTRIC COOPERATIVE, INC.
110 N ENTERPRISE DRIVE
PO BOX 40
GIRARD, KS 66743
Fax: 620-724-8253
dalec@heartland-rec.com

CURTIS D. BLANC, MANAGING ATTORNEY-REGULATORY
KANSAS CITY POWER & LIGHT COMPANY
1201 WALNUT (64106)
PO BOX 418679
KANSAS CITY, MO 64141-9679
Fax: 816-556-2787
curtis.blanc@kcpl.com

DANA BRADBURY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
Fax: 785-271-3354
d.bradbury@kcc.ks.gov
**** Hand Deliver ****

PATRICK T SMITH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
Fax: 785-271-3167
p.smith@kcc.ks.gov
**** Hand Deliver ****

JAMES P. RANKIN, ATTORNEY
FOULSTON & SIEFKIN LLP
BANK OF AMERICA TOWER, SUITE 1400
534 SOUTH KANSAS AVENUE
TOPEKA, KS 66603-3436
Fax: 785-233-1610
jrankin@foulston.com

CURTIS M. IRBY, ATTORNEY
GLAVES, IRBY & RHOADS
120 SOUTH MARKET
SUITE 100
WICHITA, KS 67202-3892
Fax: 316-264-6860
cmirby@sbcglobal.net

ROBERT V. EYE, ATTORNEY
IRIGONEGARAY & ASSOCIATES
1535 SW 29TH STREET
TOPEKA, KS 66611
Fax: 785-267-9458
bob@plilaw.com

MARY TURNER, DIRECTOR, REGULATORY AFFAIRS
KANSAS CITY POWER & LIGHT COMPANY
1201 WALNUT (64106)
PO BOX 418679
KANSAS CITY, MO 64141-9679
Fax: 816-556-2110
mary.turner@kcpl.com

TERRI PEMBERTON
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
Fax: 785-271-3354
t.pemberton@kcc.ks.gov
**** Hand Deliver ****

STUART LOWRY, EXECUTIVE VICE
PRESIDENT/GENERAL COUNSEL
KANSAS ELECTRIC COOPERATIVES, INC.
PO. BOX 4267
TOPEKA, KS 66604-0267
Fax: 785-478-4852
slowry@kec.org

CERTIFICATE OF SERVICE

09-GIME-360-GIE

DOUGLAS SHEPHERD, DIRECTOR OF SERVICES
KANSAS ELECTRIC COOPERATIVES, INC.
PO. BOX 4267
TOPEKA, KS 66604-0267
Fax: 785-478-4852
dshepherd@kec.org

STEPHEN PARR, EXEC VP & CEO
KANSAS ELECTRIC POWER CO-OP, INC.
600 SW CORPORATE VIEW (66615)
PO BOX 4877
TOPEKA, KS 66604-0877
Fax: 785-271-4888
sparr@kepco.org

JIM LUDWIG, VP REGULATORY
KANSAS GAS & ELECTRIC CO.
D/B/A WESTAR ENERGY
818 S KANSAS AVE
TOPEKA, KS 66612
james.ludwig@westarenergy.com

DAVE DITTEMORE, MANAGER OF RATES & ANALYSIS
KANSAS GAS SERVICE, A DIVISION OF ONEOK, INC.
7421 W 129TH STREET STE 300 (66213)
PO BOX 25957
SHAWNEE MISSION, KS 66225
Fax: 913-319-8622
ddittemore@oneok.com

JAMES R. WIDENER, MANAGER
KANSAS MUNICIPAL ENERGY AGENCY
6330 LAMAR AVENUE
SUITE 110
OVERLAND PARK, KS 66202
Fax: 913-677-0804

DANIEL J. O'BRIEN, GENERAL MANAGER
KAW VALLEY ELEC. COOP. ASSN. CO., INC.
P.O. BOX 750640
1100 SW AUBURN ROAD (66615)
TOPEKA, KS 66675-0640
Fax: 785-478-1088
danobrien@kve.coop

ROBERT D BOWSER, VICE PRES REGULATORY &
TECHNICAL SERVICES
KANSAS ELECTRIC POWER CO-OP, INC.
600 SW CORPORATE VIEW (66615)
PO BOX 4877
TOPEKA, KS 66604-0877
Fax: 785-271-4888
rbowser@kepco.org

J MICHAEL PETERS, GENERAL COUNSEL
KANSAS ELECTRIC POWER CO-OP, INC.
600 SW CORPORATE VIEW (66615)
PO BOX 4877
TOPEKA, KS 66604-0877
Fax: 785-271-4884
mpeters@kepco.org

JOHN P. DECOURSEY, DIRECTOR, LAW
KANSAS GAS SERVICE, A DIVISION OF ONEOK, INC
7421 W 129TH STREET STE 300 (66213)
PO BOX 25957
SHAWNEE MISSION, KS 66225
Fax: 913-319-8622
jdecoursey@kgas.com

WALKER HENDRIX, DIR, REG LAW
KANSAS GAS SERVICE, A DIVISION OF ONEOK, INC
7421 W 129TH STREET STE 300 (66213)
PO BOX 25957
SHAWNEE MISSION, KS 66225
Fax: 913-319-8622
whendrix@oneok.com

COLIN HANSEN, EXECUTIVE DIRECTOR
KANSAS MUNICIPAL UTILITIES, INC.
101 1/2 NORTH MAIN
MCPHERSON, KS 67460
Fax: 620-241-7829
chansen@kmmunet.org

EARL N. STEFFENS, GENERAL MGR.
LANE-SCOTT ELECTRIC COOPERATIVE, INC.
PO BOX 758
410 S HIGH (67839)
DIGHTON, KS 67839-0758
Fax: 620-397-5997

CERTIFICATE OF SERVICE

09-GIME-360-GIE

STEVEN O. FOSS, MANAGER
LEAVENWORTH-JEFFERSON ELEC. COOP., INC
507 N UNION (66054)
PO BOX 70
MCLOUTH, KS 66054-0070
Fax: 913-796-6164
stevef@ljec.coop

TIM MAIER, ASST. GEN. MANAGER
MCPHERSON BOARD OF PUBLIC UTILITIES
P.O. BOX 1008
400 E KANSAS AVE.
MCPHERSON, KS 67460
Fax: 620-245-2529
timm@mcgbpu.com

PATRICK PARKE, VP CUSTOMER SERVICE
MIDWEST ENERGY, INC.
1330 CANTERBURY ROAD
PO BOX 898
HAYS, KS 67601-0898
Fax: 785-625-1494
patparke@mwenergy.com

KATHLEEN M BRINKER, GENERAL MANAGER
NEMAHA-MARSHALL ELECTRIC COOPERATIVE ASSN.,
INC.
402 PRAIRIE STREET (66403)
PO BOX O
AXTELL, KS 66403-0235
Fax: 785-736-2348
kmbrinker@bbwi.net

DAVID L. JESSE, CEO
PIONEER ELECTRIC COOP. ASSN., INC.
1850 W OKLAHOMA (67880)
PO BOX 368
ULYSSES, KS 67880-0368
Fax: 620-356-4306
djesse@pld.com

ALLAN MILLER, GENERAL MANAGER
PRAIRIE LAND ELECTRIC COOPERATIVE, INC.
DISTRICT OFFICE
PO BOX 160
BIRD CITY, KS 67731
Fax: 785-734-2669
amiller@prairielandelectric.com

SCOTT WHITTINGTON, GENERAL MANAGER
LYON-COFFEY ELECTRIC COOPERATIVE, INC.
1013 N 4TH STREET (66839)
P. O. BOX 229
BURLINGTON, KS 66839-0229
Fax: 620-364-5122

EARNIE LEHMAN, CEO, PRES. & MGR.
MIDWEST ENERGY, INC.
1330 CANTERBURY ROAD
PO BOX 898
HAYS, KS 67601-0898
Fax: 785-625-1494

MICHAEL J VOLKER, DIR REGULATORY & ENERGY
SERVICES
MIDWEST ENERGY, INC.
1330 CANTERBURY ROAD
PO BOX 898
HAYS, KS 67601-0898
Fax: 785-625-1494
mvolker@mwenergy.com

CARLA A. BICKEL, GEN. MANAGER
NINNESCAH RURAL ELECTRIC COOPERATIVE ASSN.,
INC.
PO BOX 967
20112 W. U.S. 54 HIGHWAY (67124)
PRATT, KS 67124-0967
Fax: 620-672-6852

FRANK A. CARO, JR., ATTORNEY
POL SINELLI SHALTON FLANIGAN & SUELTHAUS
6201 COLLEGE BLVD
SUITE 500
OVERLAND PARK, KS 66211
Fax: 913-451-6205
fcaro@polsinelli.com

ALLAN MILLER, GENERAL MANAGER
PRAIRIE LAND ELECTRIC COOPERATIVE, INC.
1101 WEST HIGHWAY 36 (67654)
PO BOX 360
NORTON, KS 67654-0360
Fax: 785-877-3572
amiller@prairielandelectric.com

CERTIFICATE OF SERVICE

09-GIME-360-GIE

LEAH TINDLE, ADM. MANAGER
RADIANT ELECTRIC COOPERATIVE, INC.
100 NORTH 15TH STREET (66736)
PO BOX 390
FREDONIA, KS 66736-0390
Fax: 620-378-3164

ALICIA R PETERSEN, ATTORNEY AT LAW
RHOADS & SINON LLP
ONE SOUTH MARKET SQUARE
PO BOX 1146
HARRISBURG, PA 17108-1146
Fax: 717-231-6626
apetersen@rhoads-sinon.com

DOUGLAS J JACKSON, MANAGER
ROLLING HILLS ELECTRIC COOPERATIVE, INC.
122 W MAIN
PO BOX 307
MANKATO, KS 66956
Fax: 785-378-3219

ALAN L. HENNING, MANAGER
SEDGWICK COUNTY ELECTRIC COOPERATIVE ASSN.,
INC
1355 S 383RD STREET
P.O. BOX 220 (67025-0220)
CHENEY, KS 67025
Fax: 316-542-3943

ALLEN G JONES, ATTORNEY
SHOOK, HARDY & BACON L.L.P.
2555 GRAND BOULEVARD
KANSAS CITY, MO 64108
Fax: 816-421-5547
agjones@shb.com

CLETAS C. RAINS, GENERAL MANAGER/CEO
SUMNER-COWLEY ELECTRIC COOPERATIVE, INC.
2223 NORTH A STREET
PO BOX 220 (67152-0220)
WELLINGTON, KS 67152
Fax: 620-326-6579-6618
cleter@sucocoop.com

SCOTT H DEBROFF, ATTORNEY AT LAW
RHOADS & SINON LLP
ONE SOUTH MARKET SQUARE
PO BOX 1146
HARRISBURG, PA 17108-1146
Fax: 717-231-6626
sdebroyff@rhoads-sinon.com

DOUGLAS JACKSON, MANAGER
ROLLING HILLS ELECTRIC COOPERATIVE, INC.
208 WEST 1ST STREET
DISTRICT OFFICE #1
P.O. BOX 125
ELLSWORTH, KS 67439
Fax: 785-472-4652

DOUGLAS J. JACKSON, MANAGER
ROLLING HILLS ELECTRIC COOPERATIVE, INC.
DISTRICT OFFICE
2305 US 81 HIGHWAY
P.O. BOX 309
BELLEVILLE, KS 66935
Fax: 785-527-2830

MISCHA BUFORD EPPS, ATTORNEY
SHOOK, HARDY & BACON L.L.P.
2555 GRAND BOULEVARD
KANSAS CITY, MO 64108
Fax: 816-421-5547
mbuford@shb.com

SUSAN B CUNNINGHAM, ATTORNEY
SONNENSCHNEIN NATH & ROSENTHAL LLP
1026 SW WEBSTER AVENUE
TOPEKA, KS 66604
Fax: 816-531-7545
scunningham@sonnenschein.com

THOMAS K. HESTERMANN, MANAGER, REGULATORY
RELATIONS
SUNFLOWER ELECTRIC POWER CORPORATION
301 W. 13TH
PO BOX 1020 (67601-1020)
HAYS, KS 67601
Fax: 785-623-3373
tkhestermann@sunflower.net

CERTIFICATE OF SERVICE

09-GIME-360-GIE

L. EARL WATKINS, JR., CEO & PRESIDENT
SUNFLOWER ELECTRIC POWER CORPORATION
301 W. 13TH
PO BOX 1020 (67601-1020)
HAYS, KS 67601
Fax: 785-623-3395
ewatkins@sunflower.net

RON HOLSTEEN, MANAGER
TWIN VALLEY ELECTRIC COOPERATIVE, INC.
PO BOX 385
501 HUSTON
ALTAMONT, KS 67330-0385
Fax: 620-784-2464

MARK D. CALCARA, ATTORNEY
WATKINS CALCARA CHTD.
1321 MAIN STREET SUITE 300
PO DRAWER 1110
GREAT BEND, KS 67530
Fax: 620-792-2775
mcalcara@wcrf.com

MARTIN J. BREGMAN, EXEC DIR, LAW
WESTAR ENERGY, INC.
818 S KANSAS AVENUE
PO BOX 889
TOPEKA, KS 66601-0889
Fax: 785-575-8136
marty.bregman@westarenergy.com

KELLY HARRISON, VICE PRESIDENT - REGULATORY
WESTAR ENERGY, INC.
818 S KANSAS AVENUE
PO BOX 889
TOPEKA, KS 66601-0889
kelly_harrison@wr.com

NEIL K. NORMAN, MANAGER
WHEATLAND ELECTRIC COOPERATIVE, INC.
101 MAIN STREET
PO BOX 230
SCOTT CITY, KS 67871
Fax: 620-872-7170
nknorman@weci.net

JACK L. PERKINS, CHIEF EXECUTIVE OFFICER
TRI-COUNTY ELECTRIC COOPERATIVE, INC.
302 EAST GLAYDAS, PO BOX 880
HOOKER, OK 73945-0880
Fax: 580-652-3151

TERRY JANSON, GENERAL MANAGER
VICTORY ELECTRIC COOPERATIVE ASSN., INC.
3230 NORTH 14TH AVENUE
PO BOX 1335
DODGE CITY, KS 67801-1335
Fax: 620-227-8819
victory@victoryelectric.net

LINDSAY A SHEPARD, ATTORNEY
WATKINS CALCARA CHTD.
1321 MAIN STREET SUITE 300
PO DRAWER 1110
GREAT BEND, KS 67530
Fax: 620-792-2775
lshepard@wcrf.com

CATHRYN J. DINGES, CORPORATE COUNSEL
WESTAR ENERGY, INC.
818 S KANSAS AVENUE
PO BOX 889
TOPEKA, KS 66601-0889
Fax: 785-575-8136
cathy.dinges@westarenergy.com

DAVID L. SCHNEIDER, MANAGER
WESTERN COOPERATIVE ELECTRIC ASSN., INC.
635 S 13TH STREET
P.O. BOX 278
WA KEENEY, KS 67672-0278
Fax: 785-743-2717
western@ruraltel.net



Niki Christopher