



Testimony of Empire District Electric, ITC Great Plains, KCP&L, Sunflower Electric Power Corporation and Westar Energy

Neutral on HB2640

**Presented by Patrick Smith, Senior Corporate Counsel, Westar Energy
Before the Senate Utilities Committee
February 15, 2018**

Chairman Olson and members of the committee: Thank you for allowing the collective testimony of Empire, ITC, KCP&L, Mid-Kansas Electric Co., Sunflower and Westar on this important topic.

We believe that legislatively mandating the Kansas Corporation Commission (KCC) to conduct proceedings and solicit public comments on transmission and Regional Transmission Organizations four times a year is duplicative and unnecessary. The KCC already has this authority and routinely considers transmission needs and costs in regulated utility and transmission siting dockets. The KCC very thoroughly and effectively exercises its oversight responsibility in this area.

Transmission rates are currently an element considered in regulated utility dockets in accordance with K.S.A. 66-1237. The need for major transmission projects is always considered in transmission siting dockets, and the Southwest Power Pool (SPP) routinely submits testimony regarding the in-depth study process for these projects and their impacts on costs and system reliability. The general public is also able to actively participate in transmission-related dockets to the extent their interests are affected.

The KCC also tracks SPP activity and raises questions on the impacts and benefits to Kansans when it deems necessary. For example, just last year, the KCC opened a General Investigation (Docket 17-SPPE-117-GIE) to examine the costs and benefits to Kansas electric utilities participating in the Southwest Power Pool (SPP). Comments were submitted by Westar/KCP&L/Empire (jointly), Sunflower/Mid-Kansas Electric Company (MKEC), Midwest Energy, Kansas Municipal Energy Agency (KMEA), Kansas Power Pool, ITC-Great Plains, SPP, and the Citizens' Utility Ratepayer Board (CURB).

In addition, the KCC has a seat on the SPP Regional State Committee (RSC), which is comprised of state commissioners from all SPP-member states. The RSC holds meetings, which are open to the public, on a quarterly basis, and the KCC commissioner representative has always been an active participant. The KCC also participates on various SPP committees side-by-side with Kansas utility representatives and is present at all levels of SPP activities to track the ongoing issues affecting Kansas customers.

Should this proposed legislation become law, it would create an unnecessary layer of additional hearings which adds to the cost of electric utility rates which ultimately are borne by consumers. Thank you for the opportunity to offer input on House Bill 2640.