

Overview of Transmission Line Siting Process; Discussion on Wolf Creek to Blackberry Line

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Overview of Transmission Line Siting Process

K.S.A. 66-1,177 et seq.

- **Transmission lines 230kV and larger and at least five miles long.**
- **Determine Necessity of the project AND reasonableness of route.**
- **Must have public hearing in local area of proposed line.**
- **Order must be issued within 120 days of application.**

Before Transmission Line Siting Can Begin

Competitive Bid Projects (after NTC, before Siting)

- Only public utilities can operate Bulk Electric System transmission lines in Kansas.
- Unless line will be within a certificated area, New company must apply for a Certificate of Convenience and Necessity (CCN);
 - Companies with single line certificate need new certificate for each line.
- Evaluate financial/operations capabilities;
- Review the need for the project.

Overview of Transmission Line Siting

Necessity of the Project

- **Review the SPP issued Notice to Construct**
 - **Benefit to cost calculations and assumptions;**
 - **Reliability requirements.**
- **Review impact on Kansas ratepayers**
 - **Over 300kV, costs spread across SPP footprint. Kansas share is currently 16.5% based on load ratio share;**
 - **100-300KV, Kansas ratepayers pay 67%;**
 - **Less than 100kV local zone pays 100%.**
- **Review if existing infrastructure can accomplish the same goal without new construction**
 - **(See Docket 137,177-U May 1985).**

Overview of Transmission Line Siting

Reasonableness of the Route

- **Commission mandate to determine if proposed route is reasonable.**
 - **Does not pick route; there may be more than one reasonable route.**
- **Subjective process weighing policy considerations on land use.**
 - **Establishes right of eminent domain;**
 - **Results in an easement “for perpetuity” on affected landowners.**
- **Required to notify landowners within 600 feet of line; most notice to 1000 feet.**
 - **Multiple parties providing their opinions on the definition of reasonableness.**

Overview of Transmission Line Siting Reasonableness of the Route

Applicants Routing Study of Area Between two endpoints:

- Prepared by consultant using some variation of industry siting methodology.
- Goal to balance cost and complexity with impact on land use.
- Assumptions in model based on industry and Applicant's construction experiences.
- Develops scoring methodology to select route with least impact on land use at lowest cost/complexity.
- After preliminary route selected, landowner and county government feedback are obtained.

Overview of Transmission Line Siting Reasonableness of the Route

Applicants Routing Study of Area Between two endpoints:

- Feedback from public may lead to changes in scoring methodology.
- Feedback often results in “micrositing” the line to accommodate a landowner’s interests.
 - Moving poles out of cultivated land;
 - Moving farther from a house or outbuildings;
 - Moving away from creek banks.

Overview of Transmission Line Siting Reasonableness of the Route

KCC Staff Analysis of the Routing Study:

- Every siting docket has elements that are unique from other cases;
- Submit data requests to evaluate routing study assumptions;
- Request model runs to stress test the model;
- Consider impact on other infrastructure: (pipelines, roads, other transmission operators);
- Overlay proposed map on County parcel data.

Overview of Transmission Line Siting Reasonableness of the Route

KCC Staff Analysis of the Routing Study:

- **Conduct outreach with other parties**
 - **Contact local government to discuss any concerns they may have;**
 - **Investigate informal complaints from landowners;**
 - **Answer questions from concerned landowners ;**
 - **Review company records of meetings to understand accuracy of message;**
 - **Discuss opportunities to microsite lines;**
 - **Drive the route as much as possible;**
 - **Try to visit location of any caller that has contacted us.**

Overview of Transmission Line Siting

Reasonableness of the Route

Public Meeting(s):

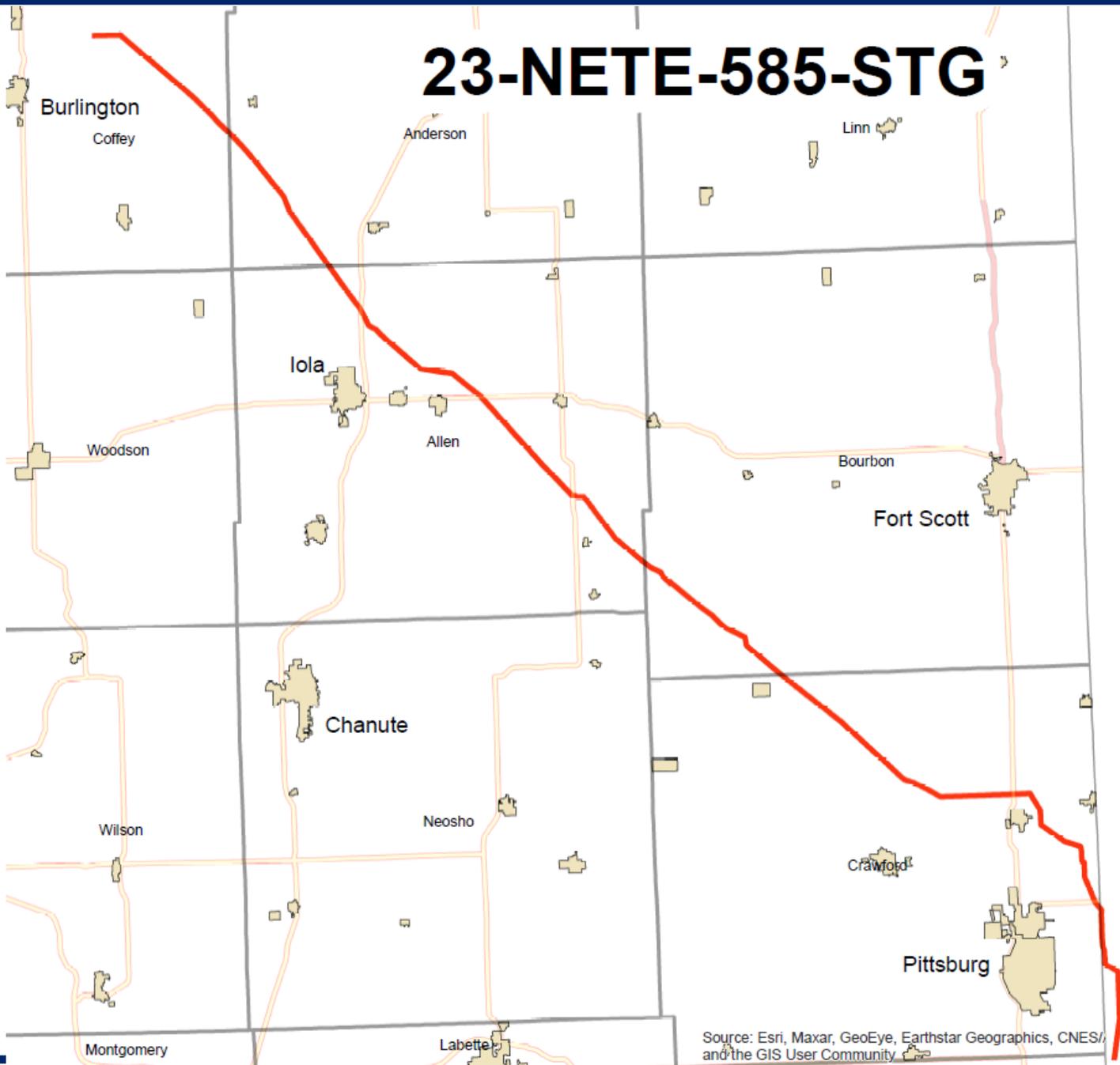
- **Pre-meeting time for company and KCC to answer/ask questions, look at maps, talk with individual landowners;**
- **Question/answer period for the group**
 - **Most questions on necessity;**
 - **Safety concerns;**
 - **Impact on county and local farming practices.**
- **Commission portion of public meeting**
 - **All comments recorded;**
 - **Commenters chance to explain their concerns.**

Overview of Transmission Line Siting Wolf Creek-Blackberry Order

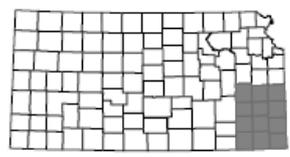
Description:

- **Length: 83 miles in Kansas; 345kV.**
- **Traverses Coffee, Anderson, Allen, Bourbon and Crawford counties.**
- **Crosses 295 parcels in Kansas.**
- **16 residences were within 500 feet of the line.**
- **Located 50% in rangeland and 39% in cropland.**
- **Necessity: 22-NETE-419-COC**
- **Necessity and Reasonableness: 23-NETE-585-STG**

23-NETE-585-STG



-  City
- Kansas Highways**
 -  Limited Access
 -  Highways
- Proposed Route**
 -  345



Key To Map

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/ and the GIS User Community



Overview of Transmission Line Siting Wolf Creek-Blackberry Order

Routing Study Principles in Siting:

- Minimize length;
- Minimize angles;
- Maintain as much distance as practicable from residential areas, individual homes, and public facilities (i.e., religious facilities, schools, etc.);
- Minimize impacts to social resources such as residences and cultural resources;
- Minimize impacts to natural resources such as wetlands, woodlands, and wildlife;
- Minimize impacts to airports and airstrips;

Overview of Transmission Line Siting Wolf Creek-Blackberry Order

Routing Study Principles in Siting (cont'd):

- Minimize conflict with current and planned uses of land;
- Minimize visual contrast with the natural landscape;
- Minimize impacts to irrigation systems;
- Follow existing rights-of-way (“ROW”) such as for roads or electric transmission lines, as appropriate; and
- Avoid federal and state lands and conservation and restricted easement areas.

Overview of Transmission Line Siting Ranking Criteria of Adverse Effects

Criteria are weighted based on Applicants evaluation of importance:

Factor	Weight
Residential Proximity Score	10
Sensitive Species Score	9
Length Not Along Existing Transmission Line (feet)	8
Total Length (feet)	6
Wetlands in ROW (acres)	5
Length through Previously Mined Areas (feet)	4
Angles Over 30 Degrees (count)	4
Floodplain in ROW (acres)	3
Cropland in ROW (acres)	3
Stream Crossings (count)	3
Archeological Sites within ROW (count)	2
Transmission Line Crossings (count)	2
Total Length through Karst Area (feet)	1
Length Not Along Parcel Boundary (feet)	1
Public Facilities within 500 feet (count)	1



Figure 3-2
Preferred Route
Wolf Creek - Blackberry
NEET Southwest

Exhibit DW-1

Overview of Transmission Line Siting Wolf Creek-Blackberry Order

Comments from Public Meeting and Hearing:

- **Three most contentious points:**
 - Line runs at a diagonal;
 - 25 miles of line is adjacent to an existing transmission line;
 - Payment should be equivalent to wind farm payments.
- **Commission Order issued 5/24/23.**
- **Found proposed route to be reasonable but with slight modifications and placed some conditions.**
 - Split decision.
 - Decision is on appeal to District Court.

Overview of Transmission Line Siting Wolf Creek-Blackberry Order

Conditions included in the Order:

- 3 reroutes for landowners;
- Approximately 7 micro-siting from original proposal with many modifications to access roads and pole locations;
- Permit and reclamation plans to be filed with the Commission;
- Provide landowners notice of right to request EMF study;
- Provide Staff with agreements with counties regarding road/bridge inspections for possible damage during construction;
- Approach SPP to provide input on routing parameters to be included in future RFPs;

Competitive Bidding and the RFP Dilemma

- Bid primarily awarded based on cost;
- While some cost estimate overrun is tolerated, significant cost overruns can have consequences;
- To develop a cost estimate within tolerance, the type of construction and the route have to be estimated;
- Any significant deviation in the route that makes it longer or more expensive (angles) will make the estimate more expensive;
- Routing changes ordered by the Commission could lead to the winning bidder rejecting the NTC and restarting the bidding/planning process;
- Approach SPP to provide input on routing parameters to be included in future RFPs.

Overview of Transmission Line Siting Wolf Creek-Blackberry Order

24-GIME-102-GIE:

- Investigation into the Principles and Priorities to be Established for Evaluating the Reasonableness of the Location of a Proposed Transmission Line in Future Line Siting Proceedings.
- Opened August 3, 2023
- Staff Report and Recommendation on the Scope of the investigation due December 1, 2023.
- To date, eight transmission owners, CURB and SPP have intervened in the docket.
- Other interested parties may file petitions to intervene
 - Deadline is January 2, 2024.