RSC Regional State Committee
FOR THE SOUTHWEST POWER POOL

1000 Center St. Little Rock, AR 72201

Southwest Power Pool

REGIONAL STATE COMMITTEE TELECONFERENCE AND IN PERSON MEETING

November 16, 2004

• M I N U T E S •

<u>Agenda Items 1 & 2 – Administrative Items</u>

RSC President Denise Bode, Oklahoma Corporation Commission (OCC) (in person),[1] called the meeting to order at 8:18 a.m. Other members in attendance or represented by proxy were:

Sandra Hochstetter, Arkansas Public Service Commission (APSC) (in person)
Brian Moline, Kansas Corporation Commission (KCC) (in person)
Steve Gaw, Missouri Public Service Commission (MPSC)
David King, New Mexico Public Regulation Commission (NMPRC) (in person)
Julie Parsley, Texas Public Utility Commission (PUCT)

Others in attendance were:

Commissioner Bob Anthony, Oklahoma Corporation Commission (in person)
Commissioner Susan Wefald, President of MISO OMS (in person)
Mary Cochran, Arkansas Public Service Commission
Richard House, Arkansas Public Service Commission
Tom DeBaun, Kansas Corporation Commission
Larry Holloway, Kansas Corporation Commission
J. Michael Peters, Kansas Corporation Commission
Mike Proctor, Missouri Public Service Commission
Craig Meyer, Missouri Public Service Commission
Ryan Kind, Missouri Office of Public Counsel
Joyce Davidson, Oklahoma Corporation Commission (in person)
Ed Farrer, Oklahoma Corporation Commission
Bridget Headrick, Texas Public Utility Commission
Jess Totten, Texas Public Utility Commission
Walter Wolf, Stone, Pigman, Walther, Wittman, LC, outside counsel for the Louisiana Public Service Commission
Tony Ingram, FERC
Bruce Rew, SPP
Carl Monroe, SPP
Les Dillahunty, SPP (in person)
Tom Littleton, OMPA
Richard Spring, Kansas City Power and Light
Tom Stuchlik, Westar
Mike Palmer, Empire Electric

[1] Unless otherwise noted, attendance was by telephone.

Steve Owens, Entergy
Mike Wise, Golden Spread
Raksha Krishna, EEI
Dave Christiano, City of Springfield
Terri Gallup, AEP
Michael Desselle, AEP
Dennis Reed, Weststar
Mel Perkins, OG&E
Bill Wylie, OG&E
Bob Koenig, OG&E (in person)

A quorum was declared. President Bode asked for adoption of the October 26, 2004 meeting minutes**. Treasurer King moved to adopt the October 26 minutes. The motion was seconded. All voted aye, and the minutes were approved.**

<u>Agenda Item 3 – Business Meeting</u>

Cost Benefit Study: President Bode stated that the contract with the vendor has been signed by Vice President Hochstetter and Treasurer King.

Cost Allocation Working Group: Mike Proctor (MPSC) reported that everyone should have received a copy of the Transmission Expansion Cost Allocation Proposal distributed on November 12, 2004 (Attachment A). With respect to requested upgrades and generation interconnection upgrades, CAWG agrees with the existing process and noted that SPP has filed both the Attachment Z process and implementation of Order 2003A with FERC. Mr. Proctor then provided a brief summary of the CAWG proposal. President Bode asked if any other member of the CAWG wanted to provide input. Richard House (APSC) commented concerning the full picture of the whole process where stakeholders could participate. Larry Holloway (KCC) discussed Attachment Z, stating that it was a good start, but it may need modification to address all the concerns on economic upgrades. Mr. Holloway noted that the RSC should decide whether they want the SPP working groups or the CAWG to lead the additional discussion.

Vice President Hochstetter requested feedback concerning whether it would be appropriate to flesh out the waiver process in the narrative to the filing or to the tariff to address the concerns of the investor-owned utilities. Larry Holloway stated that he understood from the Kansas utilities that they thought the Base Plan was a fair place to start. President Bode agreed that the narrative in the filing could set out more details instead of putting it in the actual proposal itself. Jess Totten (TPUC) noted that additional clarity would be good, but warned against inadvertently creating more uncertainty by raising new issues.

Michael Desselle (AEP) noted that he believes that the MW mile approach used for designated network resources in the Base Plan is not the appropriate way to determine beneficiaries and that the appropriate way is to use the total price of delivered energy, or the production cost model. Vice President Hochstetter stated that if folks have concerns, or if they believe that there may be unintended consequences, then they have a duty to raise their concerns in the process in a timely manner. President Bode noted that this plan is the first step and that it can be modified along the way if necessary. Mr. Desselle noted that the plan does not address his concerns and he thinks changing the rules after they are done is very difficult.

Secretary Parsley opined that the CAWG proposal was a good first step, and encouraged the group to move forward. Board Member Brian Moline and Mel Perkins (OG&E) agreed. Board Member Steve Gaw noted that pure participant funding on economic upgrades has proven not to work in some areas and observed that there may be a push to fit all projects within the Base Plan. Board Member Gaw also noted that a large number of projects attempting to fit under the waiver provisions may put additional pressure on the SPP Board to approve more and more waivers, and in the end the exception may become the rule. President Bode acknowledged the same concern, and suggested that the RSC accept the CAWG proposal and direct the CAWG to continue discussions and propose refinements to supplement the proposal on economic upgrades. Vice President Hochstetter noted that the Base Plan should not be used for economic upgrades, and agreed that the CAWG should continue working.

Board Member Moline moved to accept the November 12 Transmission Expansion Cost Allocation Proposal. Treasurer King seconded the motion. In a roll call vote, all voted aye.

New Business: Vice President Hochstetter discussed a letter to the FERC supporting the SPP's Motion for Rehearing on the RTO Order on the single issue of the MISO Joint Operating Agreement (JOA). The first concern is that MISO's agreement with PJM would be made a "standardized" joint operating agreement without analysis as to whether it is appropriate for SPP. The second concern is that there is an internal contradiction in the Order where on one hand FERC gives the RSC authority to do a cost benefit analysis and to make decisions on what is appropriate for the ratepayers in the region, but then on the other hand, has default language on the PJM JOA as being able to be used in the absence of a negotiated agreement. Vice President Hochstetter noted that she and Mary Cochran worked on a letter that was sent out to all for review.

Vice President Hochstetter moved to have the RSC sign the letter (Attachment B) to FERC as an RSC position in support of SPP's Motion for Rehearing on the RTO Order. Treasurer King seconded the motion. In a roll call vote, the following voted aye: President Bode, Vice President Hochstetter, Board Member Moline, Treasurer King, and Secretary Parsley. Board Member Gaw abstained.

Treasurer King reminded the group to submit all outstanding travel vouchers to SPP.

<u>Agenda Item 4 – Future Meetings</u>

The next scheduled RSC meeting is December 8 by teleconference to prepare for the December 14 SPP Board meeting. Meeting details and the agenda will be posted on the SPP RSC web page.

<u>Adjournment</u>

With no further business, it was moved and seconded to adjourn. President Bode adjourned the meeting at approximately 9:00 a.m.

Respectfully Submitted,

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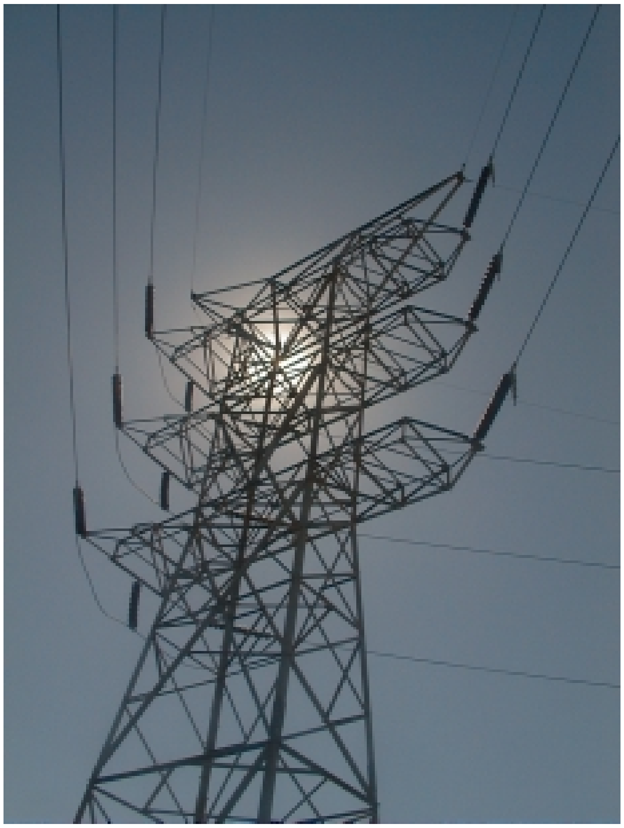
Julie Parsley, Secretary

Southwest Power Pool, Inc.

TRANSMISSION EXPANSION COST ALLOCATION PROPOSAL

November 12, 2004



Transmission Expansion Cost Allocation in SPP

Summary of Recommendations

1. Overview

The purpose of this paper is to summarize in one document the Cost Allocation Working Group's (CAWG) recommendations regarding the allocation of transmission expansion costs within the SPP region. The recommendations and the rationale behind them are a result of the many different discussions, papers, presentations and other documents that the CAWG has used during the past many months to evaluate the various aspects surrounding the transmission expansion cost allocation issues. Although not presented in this document, all of these supporting documents and presentations are posted on the SPP website.

2. Types of Transmission Expansion Projects

The paper is organized by the four different types of transmission expansion projects:

1. Base Funded Upgrades
2. Economic Upgrades
3. Requested Upgrades
4. Generator Interconnection Upgrades

Each section begins with a brief definition of the upgrade type and then summarizes the CAWG's recommendations for allocating costs associated with the specific upgrade type.

3. Base Funded Upgrades

Base Plan Upgrades are those additions and upgrades identified in the SPP transmission plan to ensure the continued reliability of the SPP transmission system, taking into account:

- Existing long-term network transmission service;
- Long-term firm point-to-point transmission service, including those with rollover rights;
- Load growth; and
- New or changed Designated Network Resources that qualify for Base Plan funding

SPP evaluates the transmission system's ability to meet these requirements as part of its biennial planning process. In doing so, the SPP Base Plan must meet the SPP Criteria and NERC Reliability Standards and provide acceptable thermal capability, stability response, short circuit capability and system voltage levels. SPP will identify the upgrades necessary to ensure these standards are met and it is these upgrades that are subject to the Base Plan funding proposal summarized below.

3.1 Recommended Approach for Allocating Base Plan Upgrade Costs

After weighing the different approaches, the CAWG has developed a recommended approach for allocating costs for base plan upgrades defined by the elements in the table below:

(i) Element	Recommended Approach
Regional allocation factor	X = 33% meaning that 33% of the base plan upgrade costs will be included in an SPP region wide rate.
Allocation of (100%-X) costs to zones	Use the SPP incremental MW Mile approach to identify zones that benefit from the upgrade and allocate the remaining costs of approved base plan upgrades to these zones.
Conditions on including future designated network resources in base plan	
a. Commitment required before upgrades associated with requests to change DNRs are eligible for base funding approach	5 years, meaning transmission customers would have to demonstrate a firm commitment to a resource for at least 5 years before any associated upgrade costs would be eligible to be included in base plan funding.
b. Maximum reserve margin	125% of peak load will be used as an initial limit. Requests that exceed this limit will be subject to a reasonability check by SPP before being approved and included in the base plan.
c. Safe harbor provision for associated network upgrade costs	$180,000/MW[1], meaning that if upgrade costs are less than this figure, they may be included in the base plan if they meet provisions a and b. If the upgrade costs exceed the safe harbor amount, the transmission customer must seek a waiver to have the additional costs eligible for base plan funding. In the absence of a waiver, these excess costs will be directly assigned to the requestor.
Waivers	See Waivers section below.
Review of the Regional Allocation Factor	Review required at least once every 5 years. SPP Board may elect to review more frequently if conditions warrant.

3.2 Safe Harbor Provision for Zonal Rate Impact

At its October 26th meeting, the RSC discussed the concept of including a zonal rate impact safe harbor provision in the base plan funding proposal and directed the CAWG to investigate this concept. The CAWG evaluated the proposal and recommended to the RSC that this component

[1] This figure was calculated as the average of the transmission investment throughout the region using each transmission owner's annual revenue requirements and fixed charge rate. Hence, a transmission customer requesting to add or change a DNR for 100 MW of service would have a safe harbor limit of $18M in transmission upgrade costs ($180,000/MW * 100 MW).

not be included in the proposal because the analysis showed that there may be unintended consequences that outweighed the potential benefits of such provision. The CAWG recommendation to eliminate this provision from the base funding proposal was discussed and endorsed by the RSC members on the November 10, 2004 conference call.

3.3 Waivers

The CAWG recognized that any plan must have sufficient flexibility built in to it so that it is both practical and does not create any undesirable barriers to the competitive market place. Hence, the CAWG recommends including certain waiver provisions that could be used to qualify an expansion project associated with a designated network resource for base funding treatment even if it does not meet the initial conditions specified in the proposal.

1. Lack of competitive alternatives – it may be appropriate to approve a project as a base funded project if there are no competitive alternatives for (one or a group) of transmission customers.
2. Dollar magnitude – there may be a *de minimus* standard that is appropriate for small projects in terms of dollar amounts that provide significant value to the region.
3. Fuel diversity – to the extent a proposed project would benefit the region's fuel diversity, it may be appropriate to allow certain upgrade costs to be eligible for base funding.
4. Upgrade costs in excess of safe harbor limit – to the extent a transmission customer's request to change a designated resource has network upgrade costs that exceed the agreed safe harbor amount (i.e., $180,000/MW), the customer may be required to demonstrate commitment beyond the minimum five-year commitment before such costs would be eligible for base plan funding.[2]
5. Commitment period waiver – it may be appropriate to grant a waiver for requests that do not meet the five-year commitment period if conditions such as the following are met:
    a. Transmission upgrades associated with the request that cost less than the $180,000/MW safe harbor amount may justify approving the upgrade even if it doesn't meet the minimum period commitment.[3]
    b. Cost-benefit – facilities with a very short payback period[4] may be eligible for flexibility in the minimum period commitment.

3.4 Review of the Regional Allocation Factor

The CAWG discussed the question as to how often the regional allocation factor (e.g., 33%) and the zonal allocation methodology (e.g., SPP MW-mile) should be reviewed and updated. The discussion focused primarily on whether the allocation factor and methodology should be: (1) updated on a regular basis (e.g., every planning cycle); (2) tied to the commitment level for the resources (e.g., the 3 year or five year term); or (3) fixed for a minimum period of time. The consensus position developed was that regional allocation factor should be reviewed at least once every 5 years. The SPP Board and RSC could review this more frequently if circumstances

[2] For example, a project that requires $20M in upgrade costs for 100 MW of a requested designated network resource (i.e., $200,000/MW) but has a ten-year commitment may qualify as a base funded project even though it exceeds the safe harbor limit of $180,000/MW.
[3] For example, a project that costs $8M in upgrades costs for 100 MW of a requested designated network resource (i.e., $80,000/MW) and has only a three-year commitment may qualify as a based funded project even though it is below the five-year minimum to qualify as a designated network resource in the base plan.
[4] The payback period is the amount of time that is required for the economic benefits from upgrades associated with a designated network resource to cover the cost of the project. For example, if the payback period is 3 years or less, a project with a three-year commitment may qualify as a base funded project.

warranted. However, the SPP should review the reasonability of this factor under any circumstances at least once every five years.

4. Economic Upgrades

The SPP planning process consists of two phases where the Base Plan Upgrades are defined in the first phase. During the second phase of the planning process, SPP will focus on potential opportunities for economic upgrades. Economic upgrades are defined as projects that are not required in the Base Plan. These projects are economic expansion facilities evaluated as part of the biennial SPP Regional Transmission Expansion Planning Process. By definition, Economic Upgrades are not required to meet NERC or SPP reliability criteria. However, there may be circumstances where an Economic Upgrade may displace or defer one or more Base Plan Upgrade projects. Either transmission customers or SPP may identify proposed Economic Upgrade projects.

4.1 Recommended Approach for Allocating Economic Upgrade Costs

The CAWG has developed a recommended approach for allocating costs for Economic Upgrades defined by the elements in the table below.

Element	**Recommended Approach**
Mandatory vs. voluntary	Voluntary. SPP may identify potential economic upgrade projects but these would not be built unless one or more parties (the Project Sponsors) agreed to fund the project.
Method for identifying beneficiaries	Generally, this evaluation is up to the Project Sponsors. SPP may identify the potential beneficiaries for a proposed project; however, it would be for information purposes only and would not be binding on any of the parties.
Regional contribution	To the extent an Economic Upgrade project defers or displaces the need for an approved Base Plan Upgrade, the Economic Upgrade project will be eligible to receive a regional contribution that is capped at the avoided base plan costs. This proposal is discussed further in the section below.
Net benefit threshold	There is not explicit net benefit threshold proposed. The Project Sponsors must make the decision as to whether an Economic Upgrade's benefits exceed its costs.
Transmission credits and rights	Transmission revenue credits will be given to the Project Sponsors in accordance with the mechanisms proposed under Attachment Z.

4.2 Regional Contribution for Economic Upgrades

The CAWG considered a number of different approaches to funding economic upgrades, and in particular considered the appropriateness of a regional contribution to these types of projects. The recommendation is that a regional contribution would be appropriate in those instances where a proposed Economic Upgrade project would allow an approved Base Plan Upgrade to either be deferred or totally displaced. The process would work as follows:

- SPP will develop the Base Plan and identify all required Base Plan Upgrades
- For each proposed Economic Upgrade, SPP will evaluate if the proposed upgrade can either displace or defer an approved Base Plan Upgrade.
- If the Economic Upgrade project will does not eliminate or delay the need for a Base Plan project, the Project Sponsors will pay 100% of the costs for the Economic Upgrade project.
- If an approved Base Plan project can be displaced or deferred, SPP will calculate the Base Plan Avoided Costs that are achievable due to the Economic Upgrade project. These costs are capped at the original project costs for the approved Base Plan Upgrade.[5]
- The Base Plan Avoided Costs will be allocated as follows:
  - 33% of the Base Plan Avoided Costs will be allocated to SPP region-wide rate
  - The remaining 67% of the Base Plan Avoided Costs will be allocated to the zones that would have benefited from the Base Plan Upgrade project(s) that are being deferred or displaced. These zones are identified using the same SPP MW-Mile approach.
  - The Project Sponsors will pay the net of the total Economic Upgrade costs less the Base Plan Avoided Costs.
- The Project Sponsors will receive transmission revenue credits up to the amount of the Economic Upgrade project costs they fund directly. Hence, this value will be up to the total project costs in the case where the Economic Upgrade project does not have any impact on the approved Base Plan upgrades. In the case where there are Base Plan Avoided Costs, the Project Sponsors will receive credits up to the net value they fund.

There may be circumstances where an Economic Upgrade Project defers or eliminates the need for a Base Plan Project that also involved the direct assignment of a portion of the Base Plan Upgrade costs. This situation can only arise in relation to Base Plan Upgrades associated with Designated Network Resources and only if the costs exceed the safe harbor limit. Consider for instance a situation where a proposed Economic Upgrade can displace an approved Base Plan Upgrade whose costs were $300,000/MW. Under the Base Plan Funding proposal, the $120,000/MW of costs in excess of the $180,000/MW safe harbor limit would be directly assigned to the transmission customer requesting these upgrades. However, the Economic Upgrade project eliminates the needs for these costs and hence these costs will not be incurred. There are two questions that arise in this situation:

- Should these “excess costs” be included in the calculation of the Base Plan Avoided Costs?
- Should these “excess costs” continue to be directly assigned even though they will not actually be incurred unless or until the associated Base Plan Upgrades are actually built?

The CAWG recommends the answer to both of these questions simply be no. Particularly in the case where a Base Plan Project is being eliminated entirely, this answer makes sense because the costs will never actually be incurred. If these excess costs were to continue to be directly assigned to the original requestors, it would effectively mean that these entities would be

[5] For example, assume the approved Base Plan includes Project A at a cost of $2M; The proposed economic upgrade project total cost is $10M but would also eliminate the need to build Project A; only $2M of the proposed economic upgrade costs would be eligible to be base funded.

specifically subsidizing the economic upgrades. Hence, by not continuing the direct assignment, the main implication is that the Base Plan Avoided Costs will be capped at the $180,000/MW limit.

5. Requested Upgrades

The CAWG is not recommending any changes to the cost allocation for transmission system upgrades associated with approval of routine transmission service requests ("Requested Upgrades") made in the course of SPP administering its OATT on a day-to-day basis. That is, Requested Upgrades are not associated with projects that are proposed and evaluated as part of the SPP Transmission Expansion Planning Process. Requested Upgrades are projects that are requested and evaluated as part of the transmission service request queue (i.e. the current process for evaluating requests or the Attachment Z process, if approved by FERC). The upgrade costs for these Requested Upgrade projects are not eligible for the proposed economic upgrade funding and will continue to be assigned per the SPP OATT.

6. Generator Interconnection Upgrades

The CAWG is not recommending any changes to the cost allocation for transmission system upgrades associated with generator interconnections. Such upgrades will continue to be evaluated and the associated costs will be allocated per SPP's implementation of Order 2003-A.

RSC Regional State Committee
FOR THE SOUTHWEST POWER POOL

1000 Center St. Little Rock, AR 72201

November 17, 2004

VIA EMAIL AND FEDERAL EXPRESS

Hon. Pat Wood, Chairman
Hon. Nora Brownell, Commissioner
Hon. Suedeen G. Kelly, Commissioner
Hon. Joseph T. Kelliher, Commissioner
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Southwest Power Pool, Inc., Docket No. ER04-1096-000

Dear Chairman Wood and Commissioners Brownell, Kelly and Kelliher:

The Southwest Power Pool ("SPP") Regional State Committee ("RSC")[1] is writing to express its support for the SPP's Request for Rehearing of the Order issued in this docket on October 1, 2004 ("October 1 Order"). The RSC filed comments in support of the SPP's filing in this docket on August 23, 2004.

In its October 1 Order, the Commission accepted the SPP's filing on an interim basis, but directed that, by December 1, 2004, the SPP file either a new Joint Operating Agreement ("JOA") to be negotiated with the Midwest ISO ("MISO") or execute and file the draft JOA attached to the protest filed by MISO, thus essentially making the MISO draft JOA the default agreement. The MISO JOA is patterned after the JOA between MISO and PJM.

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[1] The RSC, as described at Section 7.2 of the SPP Bylaws, is comprised of one designated commissioner from each state regulatory commission with jurisdiction over one or more SPP members. Current membership includes: RSC President Denise Bode, Chairman, Oklahoma Corporation Commission; RSC Vice-President Sandra Hochstetter, Chairman, Arkansas Public Service Commission; RSC Secretary Julie Parsley, Commissioner, Public Utility Commission of Texas; RSC Treasurer David King, Commissioner, New Mexico Public Regulation Commission; RSC Member Steve Gaw, Chairman, Missouri Public Service Commission; and RSC Member Brian Moline, Chairman, Kansas Corporation Commission.

The RSC is concerned that, by adopting the MISO draft JOA as the default agreement while negotiations between SPP and MISO are ostensibly ongoing, the FERC is ensuring that the MISO/PJM JOA will ultimately be adopted even though it has not been shown to be appropriate for the SPP region. MISO, knowing that the October 1 Order holds that its proposal will be adopted in the event that negotiations fail, simply has no incentive to make any concessions that would respect the different needs and market circumstances of the SPP. The SPP is thus deprived of any meaningful ability to negotiate a JOA that will be appropriate for its members and accommodate the SPP region's regulatory requirements, operational circumstances and current market structure.

Among other things, one major issue under negotiation between MISO and SPP is the reservation of capacity on constrained flowgates used by both regions. This very issue has become problematic in the JOA between MISO and PJM, yet it is our understanding that MISO is unwilling to address PJM's needs and concerns. Were this problem to be duplicated in the SPP region, and MISO's own method to prevail, not only would this be unjust and unreasonable, but it would create an interpretational dilemma with respect to the Commission's February 10, 2004, Order in Docket Nos. RT04-1-000 and ER04-48-000 ("February 10 Order"). The February 10 Order conditionally approved the SPP's RTO application, including its congestion management proposal. That proposal accorded the SPP the opportunity, in conjunction with the RSC, to determine the market design that was most cost-effective and thereby beneficial for the SPP region, which design includes the allocation of transmission capacity and choice of congestion management method. If the MISO/PJM JOA becomes the SPP/MISO seams agreement by default, the SPP RSC may effectively be deprived of its rights under the Commission's October 1 Order, or at the very least, the Commission will be faced with litigation over the interpretation and enforcement of these apparently inconsistent Orders.

Moreover, as you all are aware, the recognition and respect of regional differences is vital to the continued development and implementation of regional transmission organizations ("RTOs") and other regional transmission frameworks throughout the United States. The forced implementation of any type of "cookie-cutter" approach, a la "standard market design", would be inappropriate for the SPP—or any other—region. In order for the FERC to demonstrate to the states its commitment to recognize and respect regional differences, as well as the partnership arrangements with each RSC, it should rethink the language of its October 1 Order which appears to designate the MISO/PJM JOA as some type of "standardized" approach to transmission capacity and related markets. Employing such a tool to achieve an artificial uniformity among regional markets would not only be counterproductive, but it could significantly undermine the continued positive developments in regional coordination and cooperation in this region, particularly in light of the fact that several of the SPP state commissions must find, in proceedings that have yet to conclude, that it is in the overall net public interest for its jurisdictional electric utilities to participate in the SPP RTO.

The RSC therefore requests that you promptly grant the SPP's request for rehearing so that meaningful negotiations between the SPP and MISO may be undertaken, with the mutual goals of arriving at an SPP/MISO seams agreement that fits the characteristics of the SPP RTO, as well as meeting the FERC's December 1, 2004 deadline.

Sincerely,

Denise A. Bode

Denise Bode, President, SPP Regional State Committee
Chairman, Oklahoma Corporation Commission

Sandra L. Hochstetter

Sandra Hochstetter, Vice-President, SPP Regional State Committee
Chairman, Arkansas Public Service Commission

Julie Parsley

Julie Parsley, Secretary, SPP Regional State Committee
Commissioner, Public Utility Commission of Texas

/s/ David King

David King, Treasurer, SPP Regional State Committee
Commissioner, New Mexico Public Regulation Commission

Brian Moline

Brian Moline, Member, SPP Regional State Committee
Commissioner, Kansas Corporation Commission

cc: Official Service List