



February 12, 2021

VIA ELECTRONIC MAIL

Antoine Lucas
Southwest Power Pool, Inc.
201 Worthen Drive
Little Rock, AR 72223-4963

RE: Evergy Re-evaluation Request of Butler-Tioga 138kV Project

Dear Antoine,

SPP should not recommend a re-evaluation of the Butler-Tioga 138kV Project as requested by Evergy. Evergy concedes, "The existing Butler-Altoona line is nearly 100 years old and has needed to be rebuilt for some time."¹ That information was known to SPP when SPP made its decision to move forward with the "greenfield" Butler-Tioga 138kV Project. Evergy does not provide any information that would constitute a "material change" to cause a re-evaluation in accordance with the tariff (e.g., change in load, change in generation, modeling error)².

Evergy's re-evaluation request is an attempt to use the local planning process to drive a desired outcome in the regional planning process or to circumvent that process and the related competitive solicitation entirely. Of course Evergy has the ability to move forward with the East Eureka-Otter Creek local project and respond to the Butler-Tioga RFP with whatever proposal it believes it can demonstrate will most efficiently or cost-effectively fulfill the identified regional need, including proposing use of the existing Butler-Altoona right-of-way. The IEP will evaluate all proposals using appropriate criteria. What SPP cannot permit is Evergy's local planning decisions to force Evergy's desired result to circumvent regional planning.

FERC Order No. 1000 is clear that regions must select the more efficient or cost-effective projects to resolve regional transmission needs. SPP recommended and the SPP Board approved the Butler-Tioga 138kV project as the more efficient and cost-effective project to address the regional economic transmission needs. The RFP will decide which proposal best fulfills the selected project specifications. Evergy's re-evaluation request must be rejected.

Sincerely,

Pat Hayes

¹ Evergy Re-evaluation Request at 1

² SPP OATT Attachment Y, Section VIII(1)