



Written Only Testimony in Support of Sub for SB 323

Submitted by

Lindsay A. Campbell, Executive Vice President - General Counsel, Pioneer Electric Cooperative, Inc. & Southern Pioneer Electric Company

Mark D. Calcara, Vice President, General Counsel, Sunflower Electric Power Corporation and Mid-Kansas Electric Company, Inc.

Thank you for the opportunity to communicate our support for Substitute for Senate Bill 323. This legislation is the result of negotiation between many impacted parties. We support the ability of municipal energy agency (MEA) members to choose self-regulation of their MEA for many regulatory matters, similar to self-regulation of a generation and transmission cooperative. This legislation ensures that all utilities continue to follow the same procedure to secure from the Kansas Corporation Commission ("Commission") a certificate of public convenience for transmission rights only for the construction of any facilities in another utility's certified service territory that will be used for wholesale delivery of electricity. It also ensures the Commission retains jurisdiction and authority over the orderly development of retail electric service; avoidance of wasteful duplication of facilities for the distribution of electricity; avoidance of unnecessary encumbrance of the landscape of the state; prevention of waste of materials and natural resources; facilitation of the public convenience and necessity; and minimization of disputes between retail electric suppliers that may result in inconvenience, diminished efficiency and higher costs in serving the consumer.

Provisions of this legislation improve the process when electric service territory is removed from a rural utility by municipal annexation. The rural utility will have input in the process as the city is considering who should provide ongoing electric service in the newly annexed area. We support protections for the remaining customers of a rural utility who are impacted by the change in utility electric service territory.

Thank you for considering our comments in support of this legislation.

Lindsay A. Campbell, Executive Vice President – General Counsel  
Pioneer Electric Cooperative, Inc., and Southern Pioneer Electric Company  
[lcampbell@pioneerelectric.coop](mailto:lcampbell@pioneerelectric.coop)  
620-424-5206  
PO Box 368, 1850 W. Oklahoma  
Ulysses, KS 67880

Mark D. Calcara, Vice President, Legal Counsel  
Sunflower Electric Power Corporation and Mid-Kansas Electric Company, Inc.  
[mcalcara@sunflower.net](mailto:mcalcara@sunflower.net)  
785.623-3320  
PO Box 1020, 301 West 13<sup>th</sup> Street  
Hays, KS 67601