

March 12, 2015

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: *Southwest Power Pool, Inc.*, Docket No. ER15-164-001
Refund Report

Dear Secretary Bose:

In accordance with the Federal Energy Regulatory Commission's ("Commission") letter order issued on January 15, 2015,¹ Southwest Power Pool, Inc. ("SPP") submits a refund report.

On November 18, 2014, SPP submitted for filing: (1) an executed Service Agreement for Network Integration Transmission Service ("Service Agreement") between SPP as Transmission Provider and Kansas Electric Power Cooperative, Inc. ("KEPCO") as Network Customer ("Thirteenth Revised KEPCO Service Agreement"); and (2) an executed Network Operating Agreement ("NOA") among SPP as Transmission Provider, KEPCO as Network Customer, and Westar Energy, Inc. ("Westar") as Host Transmission Owner ("Thirteenth Revised KEPCO NOA"),² which amended its October 23, 2014 filing in this docket.³ SPP filed the Thirteenth Revised

¹ See *Sw. Power Pool, Inc.*, Letter Order, Docket No. ER15-164-000, -001 (Jan. 15, 2015) ("January Letter Order").

² See Submission of Amended Network Integration Transmission Service Agreement and Network Operating Agreement of Southwest Power Pool, Inc., Docket No. ER15-164-001 (Nov. 18, 2014) ("November Filing"). The Thirteenth Revised KEPCO Service Agreement and Thirteenth Revised KEPCO NOA are referred to collectively as the "Thirteenth Revised KEPCO Agreements," and SPP, KEPCO, and Westar are referred to collectively as the "Parties." The Thirteenth Revised KEPCO Agreements are designated as Thirteenth Revised Service Agreement No. 1636.

³ See Submission of Network Integration Transmission Service Agreement and Network Operating Agreement of Southwest Power Pool, Inc., Docket No. ER15-164-000 (Oct. 23, 2014).

KEPCO Agreements because they included terms and conditions that do not conform to the standard form of service agreements set forth in the SPP Open Access Transmission Tariff (“SPP Tariff”).⁴ As detailed in the November Filing, the Thirteenth Revised KEPCO Agreements modified and superseded the Service Agreement and NOA between the Parties accepted by the Commission on December 17, 2013 in Docket No. ER14-174-000.⁵ In the November Filing, SPP also requested a waiver of the Commission’s notice requirements to permit an effective date of August 1, 2014 for the Thirteenth Revised KEPCO Agreements.

In the January Letter Order, the Commission accepted the Thirteenth Revised KEPCO Agreements but denied SPP’s request for waiver of the 60-day prior notice requirements.⁶ Instead, the Commission made the Thirteenth Revised KEPCO Agreements effective on December 23, 2014. The Commission further required SPP to make time value refunds within 30 days of the January Letter Order and directed SPP to file a refund report with the Commission within 30 days thereafter.

As of the date of the January Letter Order, SPP had not billed KEPCO based on the new Wholesale Distribution Service Charges included in the Thirteenth Revised KEPCO Agreements. Although SPP requested an August 1, 2014 effective date for the Thirteenth Revised KEPCO Agreements, pending a Commission order accepting those agreements, SPP continued to bill KEPCO the Wholesale Distribution Service Charge of \$50,916.66 included in the Twelfth Revised KEPCO Agreements.⁷ Because SPP billed KEPCO a charge of \$50,916.66 for Wholesale Distribution Service Charges for the period of August 1, 2014 through December 22, 2014 in accordance with the Twelfth Revised KEPCO Agreements, a refund is not necessary.

⁴ See Southwest Power Pool, Inc., Open Access Transmission Tariff, Sixth Revised Volume No. 1 at Attachment F (“*pro forma* Service Agreement”) and Attachment G (“*proforma* NOA”), collectively “the *pro forma* Agreements.”

⁵ See *Sw. Power Pool, Inc.*, Letter Order, Docket No. ER14-174-000 (Dec. 17, 2013) (“December Letter Order”). The Service Agreement and NOA accepted in the December Letter Order are referred to collectively as the “Twelfth Revised KEPCO Agreements.”

⁶ See January Letter Order.

⁷ See December Letter Order.

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SPP is serving a copy of this filing on all parties to the service list in this docket, and on all representatives for the parties to the Thirteenth Revised KEPCO Agreements.

Respectfully submitted,

/s/ Tessie Kentner

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Little Rock, Arkansas, this 12th day of March, 2015.

/s/ Tessie Kentner

Tessie Kentner

**Attorney for
Southwest Power Pool, Inc.**