



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

June 30, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

KMLNRC 83-081

Re: Docket No. STN 50-482

Ref: Final Safety Analysis Report Section 8.2

Subj: Wolf Creek - West Gardner 345 kv Transmission Line

Dear Mr. Denton:

Section 8.2 of the Final Safety Analysis Report for the Wolf Creek Generating Station identifies four 345 kv transmission lines and one 69 kv line as the sources of off-site power for the Wolf Creek plant. One of these 345 kv transmission lines connects the Wolf Creek 345 kv switchyard with Kansas City Power & Light Company's West Gardner substation west of Kansas City.

On June 16, 1983, the Kansas Corporation Commission issued an Order denying KCPL's siting permit application for a 345 kv transmission line from Wolf Creek to KCPL's West Gardner substation in Johnson County, Kansas. A copy of the Corporation Commission's Order is enclosed for your information.

KCPL has filed an application for rehearing with the Kansas Corporation Commission and is analyzing other appropriate courses of action. KG&E and KCPL are reviewing the Wolf Creek off-site power system in light of the June 16, 1983 Order. Upon completion of our analysis, we will provide your staff with any additional information that may be necessary.

Yours very truly,

Kent R. Brown

for Glenn L. Koester
Vice President - Nuclear

GLK:bb
Attach

cc: JHolonich (2)
HRoberds/WSchum

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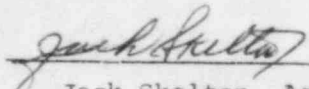
OATH OF AFFIRMATION

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

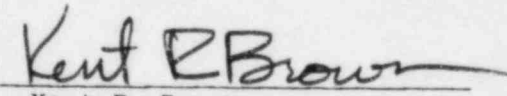
I, Kent R. Brown, of lawful age, being duly sworn upon oath, do depose, state and affirm that I am Group Vice President - Technical Services of Kansas Gas and Electric Company, Wichita, Kansas, that I have signed the foregoing letter of transmittal for Glenn L. Koester, Vice President - Nuclear of Kansas Gas and Electric Company, know the contents thereof, and that all statements contained therein are true.

KANSAS GAS AND ELECTRIC COMPANY

ATTEST:



Jack Skelton, Asst. Secretary

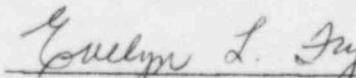
By 

Kent R. Brown
Group Vice President - Technical Services

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

BE IT REMEMBERED, that on this 30th day of June, 1983, before me, Evelyn L. Fry, a Notary, personally appeared Kent R. Brown, Group Vice President - Technical Services of Kansas Gas and Electric Company, Wichita, Kansas, who is personally known to me and who executed the foregoing instrument, and he duly acknowledged the execution of the same for and on behalf of and as the act and deed of said Corporation.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal the date and year above written.



Evelyn L. Fry, Notary



Commission expires August 15, 1984

JUN 20 1993

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSASBEFORE COMMISSIONERS: MICHAEL LENNEN, CHAIRMAN
RICHARD C. (PETE) LOUX
PHILLIP R. DICK

IN THE MATTER OF THE APPLICATION OF)
KANSAS CITY POWER & LIGHT COMPANY)
FOR APPROVAL OF THE COMMISSION OF A)
PROPOSED 345 KV ELECTRIC TRANSMISSION) DCKET NO. 137,177-U
LINE BETWEEN APPLICANT'S WEST GARDNER)
SUBSTATION IN JOHNSON COUNTY, KANSAS,)
AND ITS WOLF CREEK ELECTRIC GENERATING)
STATION IN COFFEY COUNTY, KANSAS.)

ORDER

NOW, THIS MATTER COMES ON FOR CONSIDERATION BY THE KANSAS CORPORATION COMMISSION ON THE APPLICATION OF THE KANSAS CITY POWER AND LIGHT COMPANY (KCP&L) FOR THE APPROVAL OF THE COMMISSION OF A PROPOSED 345 KV ELECTRIC TRANSMISSION LINE BETWEEN THE WOLF CREEK GENERATING STATION AND APPLICANT'S WEST GARDNER SUBSTATION.

APPEARANCES WERE AS FOLLOWS: ERIC SWANSON, CARL HARTLEY AND BLAIR HOSFORD APPEARED FOR APPLICANT KCP&L; ORVILLE COLE FOR INTERVENOR DON L. MCGINNIS; IRA DENNIS HAWVER, FOR INTERVENOR JOHN ISEMAN; AND DENNIS D. AHLERS, ASSISTANT GENERAL COUNSEL, FOR THE COMMISSION STAFF AND THE PUBLIC GENERALLY. JOE SCHNEIDER APPEARED PRO SE.

INTRODUCTION

THE PROPOSED TRANSMISSION LINE HAS HAD A LONG AND COMPLICATED HISTORY INVOLVING FEDERAL AND STATE REGULATORY AGENCIES AND COURT PROCEEDINGS OVER A PERIOD OF SEVERAL YEARS. MUCH OF THAT HISTORY IS NOT INSTRUCTIVE AS TO OUR FINDINGS IN THIS MATTER. SUFFICE IT TO SAY THAT THIS MATTER COMES BEFORE US AS A RESULT OF THE SUPREME COURT'S DECISION IN MCGINNIS V. KANSAS CITY POWER & LIGHT COMPANY, 231 KAN. 672 (1982), IN WHICH THE COURT RULED THAT KCP&L'S COMPLIANCE WITH THE NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) IN 1975 DID NOT EXEMPT THIS PROPOSED LINE FROM THE PROVISIONS OF K.S.A. 66-177 ET SEQ. THE SUPREME COURT STATED THAT KCP&L MUST SHOW COMPLIANCE WITH K.S.A. 66-1,177 ET SEQ., EITHER BY ACQUIRING A SITING PERMIT FROM THIS COMMISSION OR SHOWING THE DISTRICT COURT THAT IT HAD COMPLIED WITH THE APPLICABLE NEPA PROVISIONS.

IN RESPONSE TO THE SUPREME COURT'S DECISION, ON MARCH 24, 1983, KCPL FILED WITH THE COMMISSION AN APPLICATION FOR A TRANSMISSION LINE SITING PERMIT. NOTICE BY MAIL AND PUBLICATION WAS GIVEN IN CONFORMANCE WITH K.S.A. 66-1,179. THE MATTER WAS CALLED TO HEARING BEFORE THE HEARING EXAMINER AT 9:30 A.M. ON MAY 10, 1983 IN THE FRANKLIN COUNTY COURT BUILDING, OTTAWA, KANSAS. TESTIMONY WAS CONCLUDED ON MAY 11, 1983, AND THE HEARING CONCLUDED AND RECORD CLOSED ON MAY 18, 1983.

APPLICANT'S DIRECT CASE WAS PRESENTED BY THE FOLLOWING WITNESSES: JAMES L. MILLER, PROFESSIONAL ENGINEER IN THE NUCLEAR DEPARTMENT OF KCP&L; MICHAEL H. McGEENEY, SUPERINTENDENT, MAINTENANCE SERVICES, KCP&L; BUD J. GRIFFITH, JR., MANAGER, REAL ESTATE DEPARTMENT, KCP&L; O. L. FREEMAN, MANAGER OF TRANSMISSION AND SUBSTATION ENGINEERING, KCP&L; GARY D. BEHRENS, PROJECT MANAGER, AND LOREN W. MOSELEY, SENIOR ENVIRONMENTAL SCIENTIST, BOTH OF BLACK & VEACH CONSULTING ENGINEERS, KANSAS CITY, MISSOURI.

INTERVENOR DONALD L. MCGINNIS TESTIFIED ON HIS OWN BEHALF.

INTERVENOR JOE N. SCHNEIDER TESTIFIED ON HIS OWN BEHALF.

INTERVENOR JOHN ISEMAN TESTIFIED ON HIS OWN BEHALF AND ALSO CALLED ALAN SCHENDEL AS A WITNESS.

IN ADDITION, BROWNIE G. HERMRECH TESTIFIED AS A PUBLIC WITNESS.

FINDINGS AND CONCLUSIONS

THE COMMISSION, AFTER BEING FULLY ADVISED IN THE PREMISES AND HAVING GIVEN DUE CONSIDERATION TO THE APPLICATION, TO THE EVIDENCE RELATING THERETO, TO THE RECORDS AND EXHIBITS, TO ALL OF THE TESTIMONY, AND TO THE ENTIRE RECORD HEREIN, FINDS AND CONCLUDES THAT:

1. KANSAS CITY POWER AND LIGHT COMPANY (KCP&L) IS AN ELECTRIC PUBLIC UTILITY ORGANIZED AND EXISTING UNDER THE LAWS OF THE STATE OF KANSAS, AND IT HOLDS APPROPRIATE CERTIFICATES AND PERMITS TO TRANSACT BUSINESS AS AN ELECTRIC PUBLIC UTILITY WITHIN THE STATE OF KANSAS.

2. KCPL IS A PUBLIC UTILITY AS DEFINED IN K.S.A. 66-104, AND AS SUCH IT IS SUBJECT TO THE JURISDICTION AND REGULATORY AUTHORITY OF THIS COMMISSION, PURSUANT TO K.S.A. 66-101.

3. IN ACCORDANCE WITH K.S.A. 66-1,178, A HEARING ON THIS APPLICATION WAS SCHEDULED AND HELD ON MAY 10 AND 11, 1983, AT THE FRANKLIN COUNTY COURT BUILDING, OTTAWA, KANSAS.

4. IN ACCORDANCE WITH K.S.A. 66-1,179, NOTICE BY CERTIFIED MAIL OF THE PENDENCY OF THIS APPLICATION AND OF THE SCHEDULED HEARING WAS GIVEN TO ALL PERSONS ENTITLED THERETO. ADDITIONALLY, NOTICE BY PUBLICATION OF THE APPLICATION AND OF THE SCHEDULED HEARING WAS ALSO GIVEN IN ALL COUNTIES THROUGH WHICH THE PROPOSED LINE WOULD PASS.

5. BY VIRTUE OF 66-1,178, ET SEQ., THIS COMMISSION HAS JURISDICTION OVER THE SUBJECT MATTER AND OVER THE PARTIES TO THIS MATTER.

6. IN DOCKET NO. 121,105-U, THIS COMMISSION ISSUED AN ORDER DATED FEBRUARY 8, 1980, IN WHICH WE FIRST SET OUT THE CRITERIA THAT WE HAVE THEREAFTER CONSISTENTLY APPLIED IN JUDGING THE REASONABLENESS OF PROPOSED TRANSMISSION LINES. THOSE CRITERIA ARE: NECESSITY, COST, UTILITY, ENVIRONMENTAL AND AESTHETIC IMPACT AND ALTERNATIVE ROUTES.

7. THE FIRST OF THE CRITERIA IS THE NECESSITY OF THE PROPOSED LINE. THE COMMISSION STATED IN THE ORDER IN DOCKET 121,105-U;

"IT IS ELEMENTARY THAT UNLESS THERE IS A DEMONSTRABLE NEED FOR THE PROPOSED TRANSMISSION LINE, THE ROUTE OVER WHICH THE PROPOSED TRANSMISSION LINE WILL PASS HAS NO UNDERLYING RATIONALE OR NEED TO SUPPORT IT, AND THIS WOULD RENDER IT BOTH UNNECESSARY AND UNREASONABLE."

WE REAFFIRM THAT STATEMENT AND ADOPT IT AS A CRITERIA IN THIS MATTER. A LINE THAT IS UNNEEDED IS IN OUR OPINION UNREASONABLE PER SE.

8. THE SECOND CRITERIA THAT WE HAVE EXAMINED IS THAT OF COST. BY THIS WE MEAN NOT ONLY THE COST OF CONSTRUCTION OF THE LINE BUT ALSO THE COST OF CONSTRUCTION AS OPPOSED TO ALTERNATIVES; NOT ONLY ALTERNATIVES IN THE ROUTING OF THE LINE BUT ALTERNATIVES TO THE CONSTRUCTION OF A LINE. THIS IS ESSENTIALLY A COST-BENEFIT ANALYSIS OF THE LINE. DURING THE COURSE OF THIS PROCEEDING THESE TWO CRITERIA HAVE BEEN DISCUSSED IN CONJUNCTION WITH EACH OTHER.

9. THE PROPOSED 345 KV TRANSMISSION LINE WOULD TRAVERSE THE AREA BETWEEN THE WOLF CREEK GENERATING STATION IN COFFEY COUNTY, KANSAS TO KCP&L'S WEST GARDNER SUBSTATION IN JOHNSON COUNTY, KANSAS, A DISTANCE OF SOME 57 MILES. KCP&L OWNS 47 PERCENT OF THE WOLF CREEK GENERATING STATION AND PROMOTES THE TRANSMISSION LINE IN QUESTION AS THE MOST EFFICIENT METHOD OF TRANSPORTING ITS SHARE OF WOLF CREEK ELECTRICITY FROM THAT FACILITY TO KCP&L'S CUSTOMERS IN THE KANSAS CITY

AREA. THE WOLF CREEK FACILITY IS PRESENTLY SCHEDULED TO GO INTO SERVICE IN APRIL OR MAY OF 1985.

10. KG&E, THE OTHER MAJOR OWNER OF WOLF CREEK, PRESENTLY HAS IN OPERATION A 345 KV TRANSMISSION LINE THAT RUNS FROM THE LACYGNE GENERATING PLANT IN EASTERN KANSAS TO THE WICHITA AREA. KG&E AND KCP&L ARE CO-OWNERS OF THE LACYGNE PLANT. THAT LACYGNE TO WICHITA LINE INTERCONNECTS WITH THE WOLF CREEK GENERATING STATION AND WILL GIVE KG&E THE CAPABILITY OF SENDING WOLF CREEK CAPACITY BOTH EAST AND WEST. KG&E IS PRESENTLY CONSTRUCTING A SECOND 345 KV LINE FROM WOLF CREEK TO ROSEHILL, KANSAS. KCP&L PRESENTLY HAS A 345 KV LINE THAT INTERCONNECTS WITH KG&E'S WOLF CREEK TO LACYGNE LINE AND RUNS NORTHWESTERLY TO INTERCONNECT WITH THE WEST GARDNER SUBSTATION. THEREFORE, IT IS POSSIBLE TO TRANSMIT WOLF CREEK ELECTRICITY EAST ON KG&E'S EXISTING LINE TO KCP&L'S EXISTING LINE AND THEN TO THE WEST GARDNER SUBSTATION. IN THE COURSE OF THE HEARING THE WOLF CREEK TO LACYGNE TO WEST GARDNER ROUTE FOR TRANSMISSION OF KCP&L'S SHARE OF WOLF CREEK GENERATION WAS MUCH DISCUSSED AS A POSSIBLE ALTERNATIVE. IN ADDITION ALTERNATIVES TO THE PROPOSED LINE FOR RELIABILITY PURPOSES WERE ALSO SUGGESTED IN THE COURSE OF THE PROCEEDINGS. AMONG THE ALTERNATIVES DISCUSSED WERE THE OPERATION OF WOLF CREEK AT A LOWER THAN OPTIMUM CAPACITY OR THE INSTALLATION OF ADDITIONAL BREAKERS ON EXISTING FACILITIES.

11. KCP&L WITNESS McGEENEY TESTIFIED THAT THE TRANSMISSION LINE IN QUESTION WAS NEEDED FOR TWO REASONS (1) RELIABILITY - TO INSURE THAT THE INTERCONNECTED SYSTEM, INCLUDING THE WOLF CREEK POWER PLANT AND RELATED TRANSMISSION LINES WOULD PERFORM IN A RELIABLE AND ADEQUATE MANNER, AND (2) COMPARATIVE COST - THAT THE PURCHASE OF ADDITIONAL TRANSMISSION CAPACITY FROM KANSAS GAS AND ELECTRIC (KG&E) WOULD BE SIGNIFICANTLY MORE EXPENSIVE THAN BUILDING AND OWNING AND OPERATING THE PROPOSED LINE.

12. MR. McGEENEY CONCLUDED ON THE BASIS OF A REVIEW OF STUDIES AND ANALYSIS OF BOTH STEADY STATE AND TRANSIENT CONDITIONS FOR THE INTERCONNECTED SYSTEM IN THE GENERAL AREA OF THE WOLF CREEK GENERATING FACILITY, THAT THE PROPOSED LINE WAS NECESSARY TO MAINTAIN STABILITY AND TO INSURE ADEQUATE AND RELIABLE SERVICE AT A REASONABLE COST.

13. MR. McGEENEY TESTIFIED THAT HE CONDUCTED BOTH A STEADY STATE AND A TRANSIENT ANALYSIS. IT WAS MR. McGEENEY'S TESTIMONY THAT "THE SYSTEM WOULD PERFORM ADEQUATELY EITHER WITH OR WITHOUT THE LINE," FROM A STEADY STATE PERSPECTIVE. (McGEENEY, I TR. 61)

14. AS TO THE TRANSIENT ANALYSIS, MR. McGEENEY TESTIFIED THAT KCP&L'S ANALYSIS EVALUATED VARIOUS POSSIBLE SHORT CIRCUIT CASES NEAR THE WOLF CREEK STATION FOR SUMMER PEAK, WINTER PEAK AND OFF PEAK (SPRING AND FALL). MR. McGEENEY TESTIFIED THAT AS A PART OF HIS ANALYSIS HE EXAMINED A THREE-PHASE FAULT WITH PROPER BREAKER ACTION AND A THREE PHASE FAULT WITH A BREAKER FAILING. THE ANALYSIS ASSUMED SUCH A FAULT OCCURRING NEAR THE WOLF CREEK PLANT. HE TESTIFIED THAT SUCH A FAULT WOULD CREATE INSTABILITY THAT COULD CAUSE WHAT HE TERMED TO BE SIGNIFICANT DAMAGE TO THE GENERATORS AND COULD LEAD TO BLACK-OUTS.

15. IN HIS REPORT AT PAGE 14, MR. McGEENEY STATES:

IF THE WOLF CREEK - WEST GARDNER 345 KV LINE IS NOT CONSTRUCTED, A WORST CASE DISTURBANCE AND SOME LIKELY BREAKER FAILURE WILL, IN SOME INSTANCES, CAUSE WOLF CREEK TO LOSE SYNCHRONISM WITH OTHER GENERATING UNITS.

16. MR. McGEENEY CHARACTERIZED THE PROBABILITY OF SUCH A THREE-PHASE FAULT WITH A BREAKER FAILURE OCCURRING AS "SMALL." HE TESTIFIED THAT HE HAD NEITHER CONDUCTED NOR KNEW OF ANY STUDIES WHICH DEMONSTRATED THE PROBABILITY OF SUCH AN OCCURRENCE. (McGEENEY, I TR. 65)

17. MR. McGEENEY ADMITTED UNDER CROSS-EXAMINATION BY STAFF COUNSEL THAT THE TRANSIENT STABILITY DIFFICULTY COULD BE ALLEVIATED THROUGH MEANS OTHER THAN BUILDING A TRANSMISSION LINE. HE STATED THAT OPERATING THE UNIT AT REDUCED CAPACITY COULD OVERCOME THIS PROBLEM, ALTHOUGH HE TESTIFIED THAT HE COULD NOT STATE HOW MUCH THE CAPACITY WOULD HAVE TO BE REDUCED BECAUSE HE HAD NOT STUDIED THAT POSSIBILITY. IT WAS HIS TESTIMONY THAT SUCH A POSSIBILITY HAD NOT BEEN STUDIED BECAUSE KCP&L AND KG&E INTENDED TO RUN THE PLANT AT 100 PERCENT CAPACITY DUE TO THE FUEL SAVINGS ASSOCIATED WITH THE USE OF THE WOLF CREEK PLANT COMPARED WITH OIL OR GAS FIRED PLANTS. (McGEENEY, I TR. 67-69).

18. MR. McGEENEY ALSO TESTIFIED THAT INSTALLING TWO BREAKERS RATHER THAN ONE, WHAT HE REFERRED TO AS "REDUNDANCY", WOULD CREATE A

"MUCH SMALLER CHANCE" OF INSTABILITY OCCURRING. MR. FREEMAN TESTIFIED THAT THE COST WOULD BE \$200,000 PER BREAKER. HE STATED THAT THE SUBSTATION WOULD HAVE TO BE REDESIGNED TO ACCOMMODATE A NEW BREAKER. HE TESTIFIED IT WOULD BE "VERY EXPENSIVE" TO REDESIGN THE SUBSTATION BUT COULD NOT GIVE A FIGURE ON THE COST OF INSTALLING ADDITIONAL BREAKERS.

19. MR. McGEENEY ADMITTED THAT THE WOLF CREEK TO LACYGNE LINE WOULD NOT BE USED BY KG&E AT A CAPACITY THAT WOULD PREVENT THE WHEELING OF KCP&L'S POWER OVER THAT LINE. MR. McGEENEY REPEATEDLY STATED THAT THE KG&E LACYGNE LINE HAD SUFFICIENT CAPACITY TO CARRY KCP&L'S SHARE OF WOLF CREEK CAPACITY TO KCP&L'S KANSAS CITY GRID. (McGEENEY, 1 TR. 70, 90)

20. MR. BEHRENS TESTIFYING AS TO THE SAME EXHIBIT STATED THAT THERE WAS A VERY SMALL AMOUNT OF ELECTRICITY FLOWING FROM LACYGNE WEST AND THAT THE CAPACITY OF THE LINE WAS MUCH GREATER THAN THE PROJECTED USE. (BEHRENS, 11 TR. 8, 9, 11)

21. MR. McGEENEY TESTIFIED THAT A 345 KV LINE HAD THE CAPACITY TO CARRY KCP&L'S ENTIRE SHARE OF WOLF CREEK CAPACITY, SOME 540 MEGAWATTS, YET THE LOAD FLOW STUDIES THAT HE SPONSORED SHOW ONLY MINIMAL LOADS FLOWING OVER THE WOLF CREEK TO LACYGNE LINE IN THE SUMMER OF 1985. HIS STUDIES FURTHER SHOW ONLY 180 MEGAWATTS FLOWING TO THE KANSAS CITY AREA IN THE SAME PERIOD OVER THE PROPOSED LINE. HE ADMITTED THAT THERE WAS NO IMPEDIMENT TO SENDING THE 180 MEGAWATTS EAST ON THE LACYGNE LINE FROM AN ENGINEERING OR CAPACITY STANDPOINT. HE RAISED ONLY ONE IMPEDIMENT AT ALL--THAT OF THE WHEELING CHARGE FOR USING KG&E'S LINE.

22. APPLICANT'S EXHIBIT K STATES THE RELATIVE COST ANALYSIS OF BUILDING AND MAINTAINING THE LINE AS OPPOSED TO WHEELING THE POWER OVER KG&E'S LINE. THE TOTAL WHEELING COST ON THE EXHIBIT IS BASED UPON 540 MW OF POWER BEING WHEELED. EXHIBIT K WAS RELIED ON BY KCP&L TO SHOW THAT THE COST OF WHEELING POWER OVER THE LACYGNE LINE WOULD BE HIGHER THAN THE COST OF CONSTRUCTING AND MAINTAINING THE PROPOSED LINE. THE EXHIBIT PURPORTS TO SHOW THAT THE COST OF WHEELING WOULD BE 5 TO 6 MILLION DOLLARS PER YEAR MORE EXPENSIVE THAN THE PROPOSED LINE.

23. AS TO EXHIBIT K ITSELF HOWEVER, WE FIND A PAUCITY OF EVIDENCE AS TO HOW THE EXHIBIT WAS PREPARED AND WHAT THE NUMBERS SIGNIFY. IN THE EXHIBIT THE TOTAL COST OF THE LINE AND SUBSTATION OF \$16,450,000 IS MULTIPLIED BY A "LEVELIZED FIXED RATE CHARGE" OF 19.20 PERCENT. MR. McGEENEY COULD NOT EXPLAIN HOW THE RATE WAS ARRIVED AT. HE SIMPLY TESTIFIED THAT THE NUMBER WAS GIVEN TO HIM BY THE FINANCIAL DEPARTMENT OF KCP&L. (McGEENEY, I TR. 77)

24. THE WHEELING CHARGE SHOWN ON EXHIBIT K IS PURPORTEDLY BASED UPON THE PRESENT WHEELING RATE FOR 138 KV AND ABOVE TRANSMISSION LINES AS SET BY THE FEDERAL ENERGY REGULATORY COMMISSION FOR KG&E. MR. McGEENEY MADE IT CLEAR THAT KCP&L DID NOT ASK KG&E TO CALCULATE AT WHAT RATE KG&E WOULD AGREE TO WHEEL POWER FOR KCP&L. THE RECORD DOES NOT DEMONSTRATE THAT KCP&L HAS INVESTIGATED ANY ALTERNATIVE ARRANGEMENTS TO WHEELING SUCH AS PURCHASING A PORTION OR ALL OF THE LACYGNE LINE FROM KG&E.

25. IT WAS MR. McGEENEY'S TESTIMONY THAT IF THE LINE WAS BUILT KCP&L WOULD NOT HAVE TO PAY A WHEELING CHARGE EVEN IF ONLY 180 MW OF ITS 540 TRAVELLED OVER ITS OWN LINE. HOWEVER, IF NO LINE WAS BUILT IT WOULD HAVE TO PAY FOR WHEELING A FULL 540. UNDER CROSS-EXAMINATION HE APPEARED UNKNOWNLEDGEABLE AS TO WHETHER THIS WAS A MATTER OF CONTRACT OR PRACTICE OR INFORMAL AGREEMENT. IN ESSENCE THERE IS NO COMPETENT EVIDENCE AS TO ANY SUCH AGREEMENT IN THE RECORD ONLY MR. McGEENEY'S VAGUE AND INCONCLUSIVE TESTIMONY.

26. THE COMMISSION MUST CONCLUDE THAT APPLICANT HAS NOT MET ITS BURDEN OF DEMONSTRATING THAT THE PROPOSED LINE IS NECESSARY. AS STATED EARLIER, KCPL ADVANCED TWO THEORIES AS TO WHY THIS LINE WAS NECESSARY, NAMELY TRANSIENT STABILITY AND THE COMPARATIVE COST. AS TO TRANSIENT STABILITY, APPLICANT'S STUDY SHOWED THE NEED FOR THIS TRANSMISSION LINE UNDER A "WORST CASE" SCENARIO. KCP&L COULD PRESENT NO EVIDENCE AS TO THE PROBABILITY OF SUCH AN EVENT OCCURRING AND ADMITTED THAT THE PROBABILITY WAS SMALL. IT WAS ALSO ADMITTED THAT THE STABILITY PROBLEM COULD BE OVERCOME BY MEANS OTHER THAN THE PROPOSED LINE. THIS COULD BE DONE EITHER THROUGH OPERATING THE PLANT BELOW ITS DESIGNED CAPACITY OR BY INSTALLING ADDITIONAL BREAKERS. KCPL'S WITNESSES COULD NOT AUTHORITATIVELY STATE EITHER THE AMOUNT

BELOW FULL CAPACITY THAT THE PLANT MUST OPERATE OR THE TOTAL COST OF PLACING ADDITIONAL BREAKERS ON THE EXISTING LINE TO ALLEVIATE THE STABILITY PROBLEM.

27. ON THE QUESTION OF TRANSMITTING KCP&L'S SHARE OF WOLF CREEK POWER TO THE KANSAS CITY AREA, IT IS CLEAR FROM THE RECORD, EXHIBITS AND TESTIMONY THAT THE ALREADY EXISTING LINE FROM LACYGNE TO WOLF CREEK HAS SUFFICIENT CAPACITY TO TRANSMIT THAT POWER. IN FACT, FIGURES 6, 7, AND 8 OF APPLICANT'S EXHIBIT J SHOW THAT WITHOUT THE PROPOSED TRANSMISSION LINE THE LOADS DO FLOW TO THE EAST OVER THE LACYGNE LINE AND NEVER EXCEED 236 MW DURING THE PERIOD STUDIED, FAR BELOW THE CAPACITY OF THE LINE.

28. IT THUS DEVELOPS THAT THE ONLY STUMBLING BLOCK FOR KCP&L IN TRANSMITTING THIS POWER OVER THE EXISTING LINE IS THAT KG&E OWNS IT AND NOT KCP&L. THEREFORE, KCP&L WOULD LIKELY HAVE TO PAY KG&E TO WHEEL APPLICANT'S SHARE OF WOLF CREEK POWER, ALTHOUGH THE RATE IS UNCLEAR AT THIS POINT. ON THIS POINT HOWEVER, THERE ARE ALSO ALTERNATIVES. KCP&L COULD OFFER TO PURCHASE A SHARE OF OR ALL OF THE EXISTING LINE. APPLICANT IS, AFTER ALL, A CO-OWNER OF BOTH LACYGNE AND WOLF CREEK WITH KG&E AND IT WOULD NOT BE UNREASONABLE TO SHARE OWNERSHIP OF A TRANSMISSION LINE BETWEEN THOSE FACILITIES. IT IS CLEAR FROM THE RECORD THAT KCP&L HAS MADE NO INQUIRIES CONCERNING SUCH A PURCHASE. FURTHERMORE, IT IS CLEAR THAT KCP&L HAS NOT SERIOUSLY DISCUSSED THE POSSIBILITY OF WHEELING ITS WOLF CREEK POWER OVER THE KG&E LINE AND HAS NOT OBTAINED A QUOTE FROM KG&E AS TO THE RATE FOR THE WHEELING OF KCP&L POWER OVER THAT LINE.

29. THE EVIDENCE AS TO THE ACTUAL COST OF WHEELING THE POWER IS UNCERTAIN AND INCONCLUSIVE AT BEST. BASED UPON THE EVIDENCE PRESENTED THE COMMISSION CANNOT FIND THAT WHEELING IS NOT A REASONABLE ALTERNATIVE TO THE CONSTRUCTION OF THE PROPOSED LINE.

30. THIS COMMISSION HAS A DUTY TO PROTECT THE RATEPAYERS OF KANSAS FROM UNNECESSARY EXPENSE, DUPLICATIVE FACILITIES AND UNNECESSARY HARM TO THE ENVIRONMENT. THERE IS INEVITABLE ENVIRONMENTAL AND AESTHETIC HARM FROM THE CONSTRUCTION AND MAINTENANCE OF TRANSMISSION LINES UNDER THE BEST OF CIRCUMSTANCES. VALUABLE AND PRODUCTIVE FARM LAND IS TAKEN OUT OF PRODUCTION, TREES ARE CLEARED,

EROSION OCCURS, SCENIC LANDSCAPE IS MARKED BY THE OBSTRUCTION OF TOWERS AND LINES, AND INCONVENIENCE IS IMPOSED ON LANDOWNERS. IN ALL CASES INVOLVING TRANSMISSION LINES THE COMMISSION MUST ATTEMPT TO INSURE THAT SUCH HARM IS MINIMIZED AND MUST DETERMINE IF THE SOCIAL AND ENVIRONMENTAL COST IS OUTWEIGHED BY THE BENEFIT OF AND NEED FOR THE PROPOSED LINE. WHERE A LINE IS NOT NEEDED THESE ATTENDANT COSTS ARE BY DEFINITION UNREASONABLE.

31. SUCH AN INTRUSION UPON THE PRIVATE PROPERTY OF INDIVIDUALS AND UPON THE ENVIRONMENT OF THE AREA MUST ONLY BE ALLOWED WHERE A GENUINE AND DEMONSTRABLE NEED FOR THE TRANSMISSION LINE EXISTS. IN THIS INSTANCE WE FIND THAT KCP&L HAS FAILED TO INTRODUCE SUFFICIENT CREDIBLE AND COMPETENT EVIDENCE TO PROVE TO THIS COMMISSION THAT THE PROPOSED 345 KV LINE IS NECESSARY. IT MAY BE THAT SUCH A LINE WOULD BE JUSTIFIED FURTHER IN THE FUTURE. HOWEVER KCP&L HAS CHOSEN TO PRESENT PROJECTIONS ONLY THROUGH 1986 WHICH DEMONSTRATE THAT THE THREE KG&E LINES HAVE SUFFICIENT CAPACITY TO DISTRIBUTE THE WOLF CREEK GENERATION TO THE CUSTOMERS OF BOTH UTILITIES.

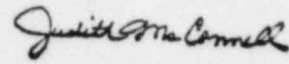
32. ALL IN ALL THE RECORD ON THIS POINT BESPEAKS A LONG-STANDING DESIRE BY KCP&L TO BUILD A 345 KV TRANSMISSION LINE AND VERY LITTLE, IF ANY, SERIOUS CONSIDERATION OF ALTERNATIVES TO THE CONSTRUCTION OF SUCH A LINE. THE TESTIMONY OF KCP&L'S WITNESSES ON THE NEED FOR THIS LINE AND THE COST OF ALTERNATIVES RAISED MORE QUESTIONS THAN IT ANSWERED. THEREFORE AND FOR THE REASONS STATED THE APPLICATION OF KCP&L FOR A SITING PERMIT FOR A 345 KV ELECTRIC TRANSMISSION LINE FROM THE WOLF CREEK GENERATING STATION TO APPLICANT'S WEST GARDNER SUBSTATION IS DENIED.

33. HAVING MADE THESE FINDINGS AND CONCLUSIONS IT IS UNNECESSARY FOR THE COMMISSION TO DISCUSS THE EVIDENCE PRESENTED CONCERNING THE OTHER CRITERIA THAT THE COMMISSION HAS TRADITIONALLY EXAMINED. WE WOULD NOTE, HOWEVER, AS TO THE PROPOSED ROUTE, THAT IT APPEARS THAT KCP&L WAS DETERMINED TO BUILD THE LINE WHERE ORIGINALLY PROPOSED SOME EIGHT OR NINE YEARS AGO AND TO IGNORE DEVELOPMENTS ALONG THAT ROUTE IN THE INTERVENING YEARS. WE WOULD ADVISE APPLICANT THAT THE QUESTION BEFORE US IS WHETHER THE LINE IS PRESENTLY REASONABLE NOT WHETHER IT WAS REASONABLE WHEN FIRST PROPOSED.

IT IS THEREFORE BY THE COMMISSION ORDERED THAT THE APPLICATION
FOR A SITING PERMIT FOR A 345 KV LINE FROM WOLF CREEK TO WEST GARDNER
IS DENIED.

DATED: JUNE 16, 1983

LENNEN, CHMN.; LOUX, COM.; DICK, COM.



JUDITH McCONNELL
EXECUTIVE SECRETARY

DDA:HB