

**Written Comments of Westar Energy, KCP&L and
The Empire District Electric Company
Before the House Energy & Environment Committee
March 19, 2013**

Chairman Hedke and members of the committee, Kansas electric utilities are providing a few neutral comments about 2013 renewable energy standard (RES) legislation, at your request.

Kansas electric utilities have been the state's leaders in the expansion of renewable wind energy since 2005. Kansas electric utilities have also acquired wind energy at favorable prices, which has mitigated increases in electricity prices Kansans pay. The KCC reported to the legislature on March 1, 2013 the rate impact of meeting the RES to date is less than 2%, about 0.16 cents per kwh. Kansas currently has approximately 2600 MW of wind capacity. Although collectively we have substantial renewables on our systems, the rate impact has been relatively small compared with the cost of installing environmental air emission controls on our fossil-fueled plants.

Large capital intensive projects to comply with federal EPA regulations put significant pressure on our customers' rates. For example, environmental retrofits at just the LaCygne power plant, which is co-owned by Westar and KCP&L, will cost about \$1.2 billion. The proposed extension of the compliance dates to meet the next investment levels of the state's RES will allow some flexibility for Kansas electric utilities to manage increasing levels of renewable power.

Some wind facilities in western Kansas are currently experiencing curtailments due to transmission congestion. Proposals to allow the KCC to adjust or relieve the renewable requirements if firm transmission is not available could be appropriate.

The establishment of an RES was a public policy decision in 2009. Extending the compliance deadlines preserves the policy decision made in 2009, but allows utilities an opportunity to manage the cost of compliance. However, past performance demonstrates our ability to seek the best price for renewable energy, showing the current law provides flexibility to utilities and the KCC.

Thank you for the opportunity to submit these comments.