

**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

Received  
on

**MAY 31 2013**

by  
State Corporation Commission  
of Kansas

**In the Matter of the Application of Westar Energy, )  
Inc. for a Siting Permit for the Construction of a 345 )  
kV Transmission Line in Saline and Ottawa )  
Counties, Kansas. )**

**Docket No. 13-WSEE-676-MIS**

**DIRECT TESTIMONY**

**OF**

**THOMAS B. DEBAUN**

**ON BEHALF OF**

**THE STATE CORPORATION COMMISSION**

**OF THE STATE OF KANSAS**

May 31, 2013

1   **Q.    Please state your name.**

2   A.    My name is Thomas B. DeBaun. My business address is 1500 SW Arrowhead Road,  
3       Topeka, Kansas 66604-4027.

4   **Q.    By whom, and in what capacity, are you employed?**

5   A.    I am a Senior Energy Engineer in the Energy Operations Section, Utilities Division,  
6       Kansas Corporation Commission.

7   **Q.    Please summarize your educational background and professional experience.**

8   A.    I hold a Bachelor of Science degree in Electrical Engineering from Kansas State  
9       University. My experience includes an undergraduate internship at an area electric  
10      generating station and subsequent employment with an investor owned electric utility in  
11      Chicago as distribution engineer and residential/commercial marketing representative. I  
12      returned to Kansas to become an owner and eventually president of a small, privately  
13      held retail corporation. I joined the Commission in 2000 as a Pipeline Safety Engineer  
14      and assumed my present position in 2002.

15      For the past decade, I have represented the Commission as a staff liaison at numerous  
16      Southwest Power Pool, Inc. (SPP) working groups, task forces, and planning summits.  
17      At the present, I am Chairman of the Cost Allocation Working Group (CAWG), which is  
18      subordinate to the state regulatory commissioners' committee—the Regional state  
19      Committee (RSC). I typically attend over 75 SPP face-to-face meetings or  
20      teleconferences per year.

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1   **Q.    Have you previously testified before this Commission?**

2   A.    Yes. I testified in all six of the previous line siting applications that have come before the  
3       Commission since SPP was approved by the Federal Energy Regulatory Commission  
4       (FERC) as a Regional Transmission Organization in 2004, as well as, other dockets.

5   **Q.    What is the purpose of your testimony in this proceeding?**

6   A.    The primary purpose of my testimony is to address the necessity of the Westar Energy,  
7       Inc. (Westar) portion of an SPP-approved 345 kV (345,000 volt or 345 kilovolt)  
8       transmission project referred to as the Elm Creek to Summit Project. I will also consider  
9       benefits afforded by the line to consumers in Kansas and consumers outside of Kansas, as  
10      well as, economic development benefits in Kansas as indicated in K.S.A. 66-1,180.<sup>1</sup> I  
11      will also address some aspects of cost allocation and recommend the Commission require  
12      quarterly reports from the Elm Creek to Summit Project owners until such time as the  
13      associated upgrades are complete and all engineering and construction costs are known.

14   **Q.    Please outline your testimony.**

15   A.    I intend to present information to the Commission on the following topics and in the  
16      following sequence:

17               I.     History, scope, and costs

18               II.    Necessity, benefits, and economic development

19               III.   Project tracking

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<sup>1</sup> 66-1,180. Same; siting; proceedings; permit. All hearings conducted pursuant to this act shall be in accordance with the provisions of the Kansas administrative procedure act. All such hearings shall be completed within 30 days after the commencement thereof, unless the electric utility requests a continuance of any such hearing. All costs of any hearing pursuant to this act shall be taxed against the electric utility. The commission shall make its decision with respect to the necessity for and the reasonableness of the location of the proposed electric transmission line, taking into consideration the benefit to both consumers in Kansas and consumers outside the state and economic development benefits in Kansas. The commission shall issue or withhold the permit applied for and may condition such permit as the commission may deem just and reasonable and as may, in its judgment, best protect the rights of all interested parties and those of the general public.

1 I. History, Scope, and Costs

2 **Q. Please provide a brief history of the Elm Creek to Summit Project.**

3 A. The proposed project has appeared in SPP Planning studies for a number of years. As an  
4 example, an SPP presentation by Mr. Jay Caspary covered the results of an SPP study of  
5 potential transmission expansion that would benefit both Kansas and Nebraska in  
6 October 2005 at Kansas Electric Transmission Summit III. The entire 345 kV line  
7 considered in that study included multiple line segments from Sooner, Oklahoma to  
8 Pauline, Nebraska as illustrated in Figure 1 (dashed lines in red).<sup>2</sup>

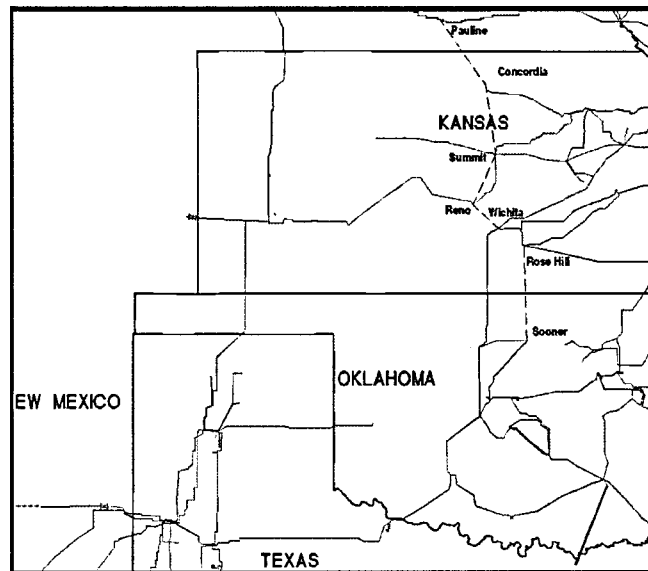


Figure 1

11 The Commission previously granted line siting applications by Westar for two of the  
12 segments in Figure 1. A 345 kV transmission projects from Rose Hill, Kansas to the

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<sup>2</sup> "Cost /Benefit Analysis of Potential Kansas Transmission Lines, Jay Caspary (SPP). Presentation to Kansas Electric Transmission Summit III, Robert J. Dole Institute, University of Kansas West Campus, Lawrence, Kansas, October 31, 2005.

Oklahoma border (Rose Hill to Sooner Project) was approved by Commission Order in 2008<sup>3</sup> and, prior to that, the Wichita – Reno – Summit line in 2007<sup>4</sup>.

Upon subsequent study, SPP authorized the actual construction of the Elm Creek to Summit transmission line (the Summit to Concordia line segment in Figure 1) in January 2012. The project forms a connection between two Transmission Owners (TOs), namely the ITC Great Plains Elm Creek substation southeast of Concordia and the Westar, Inc. (Westar) Summit substation southeast of Salina. In keeping with the SPP Open Access Transmission Tariff (OATT), the two TOs decided among themselves which part of the project would be provided by each entity.<sup>5</sup> Westar will build approximately 29 miles of the southern portion of the line and ITC Great Plains will build approximately 30 miles of the northern portion. The Elm Creek to Summit Project is depicted in Figure 2, including a new transformer at Elm Creek (red dot).

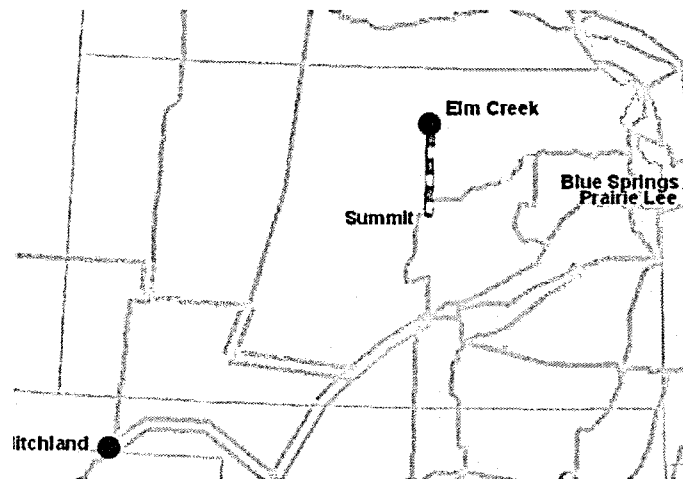


Figure 2

<sup>3</sup> Docket No. 08-WSEE-609-MIS, In the Matter of the Application of Westar Energy, Inc. and Kansas Gas and Electric Company (Collectively "Westar") for a Siting Permit for the Construction of a 345 kV Transmission Line in Butler, Sumner and Cowley Counties, Kansas; Commission Order, April 25, 2008.

<sup>4</sup> Docket No. 07-WSEE-715-MIS, In the Matter of the Application of Westar Energy, Inc. and Kansas Gas and Electric Company (collectively "Westar") for a Siting Permit for the Construction of a 345 kV Transmission Line in Sedgwick, Harvey, Reno, McPherson and Saline Counties, Kansas; Commission Order, May 16, 2007.

<sup>5</sup> SPP OATT, Attachment O, Section IV (4).

1   **Q.    What is the scope of the project that is the subject of this Application?**

2   A.    On March 18, 2013, SPP issued a final version of a Notification to Construct (SPP-NTC-  
3       200221) directing Westar to, “Build [a] new 345 kV line from the Summit substation to  
4       the ITC Great Plains, LLC interception point from the Elm Creek substation.”<sup>6</sup> The  
5       upgrade SPP assigned to Westar (Upgrade ID 50429) is one of five upgrades included in  
6       the overall Elm Creek to Summit Project.

7   **Q.    Why is Westar assigned only one portion of the Elm Creek to Summit Project?**

8   A.    The overall Elm Creek to Summit project (SPP Project ID: 30367) will be split between  
9       the “incumbent” transmission owners of the substations serving as the electrical  
10       terminations for the ends of the line—namely ITC Great Plains, owner of the Elm Creek  
11       Substation, and Westar, owner of the Summit Substation. According to the SPP OATT,  
12       Attachment O, Section IV.4, “If there is more than one Transmission Owner designated  
13       to construct a project, the Designated Transmission Owners will agree among themselves  
14       which part of the project will be provided by each entity.” Westar and ITC-Great Plains  
15       negotiated apportionment of the project with each being responsible for approximately  
16       one-half of the total line mileage. Subsequently and pursuant to an existing Co-  
17       Development Agreement between ITC Great Plains and Mid-Kansas Electric Company,  
18       LLC (Mid-Kansas), ownership of the portion assigned to ITC Great Plains will be further  
19       divided between ITC Great Plains and Mid-Kansas (ITCGP/Mid-Kansas).<sup>7</sup> ITCGP/Mid-  
20       Kansas filed a Joint Application in Docket No. 13-WSEE-676-MIS. Thus, there will be  
21       three certificated public utilities in Kansas who own portions of the approximately 60-  
22       mile project.

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<sup>6</sup> Direct Testimony of Kelly B. Harrison, Exhibit KBH-2, Sheet 5, SPP Notification to Construct, March 18, 2013.

<sup>7</sup> Application, p.5, footnote 2

1 **Q. What are the estimated costs for Westar's assigned portion of the Elm Creek to**  
2 **Summit Project?**

3 A. Westar estimates its portion of the project will cost approximately \$66 million. The  
4 SPP-approved upgrades for the entire project appear in Table 1, with Upgrade ID 50429  
5 as the portion assigned to Westar:

Project ID: 30367 - Elm Creek to Summit Project  
Need Date for Project: March 1, 2018

Company	Upgrade ID	Network Upgrade Name	Estimated Cost
ITCGP	50425	Build new 345 kV line from Elm Creek to Summit (ITCGP portion)	\$ 31,312,169
ITCGP	50426	Install new 345/230 kV transformer at Elm Creek	\$ 5,405,101
ITCGP	50427	Bus work on 345 kV side at Elm Creek substation	\$ 8,243,291
ITCGP	50428	Bus work on 230 kV side at Elm Creek substation	\$ 1,886,035
<b>Westar</b>	<b>50429</b>	<b>Build new 345 kV line from Summit to ITCGP portion</b>	<b>\$ 66,202,442</b>
Project Total			\$ 113,049,038

Table 1

8 **Q. Will the Westar portion of the Elm Creek to Summit Project be entirely funded on a**  
9 **region-wide basis?**

10 A. Yes. Under "base plan funding" as it is currently structured, most projects over 300 kV  
11 are regionally (Highway) funded. As explained in the Direct Testimony of Dennis L.  
12 Reed, "...100% of the costs associated with the Elm Creek to Summit project will be  
13 allocated regionally."<sup>8</sup>

14 **Q. How will the costs related to the Westar portion of the Elm Creek to Summit**  
15 **Project affect the rates paid by Kansas retail customers?**

16 A. Again, referring to Mr. Reed's testimony, Kansas customers will collectively pay for  
17 approximately 19% of the "regionally funded" costs of the Elm Creek to Summit project

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<sup>8</sup> Direct Testimony of Dennis L. Reed, p. 7, lines 15-17.

1 (11.2% for Westar only<sup>9</sup>). Regionally funded costs are allocated to more localized  
2 pricing zones, which are typically designated by SPP according to the predominant  
3 Transmission Owner in the zone, based on the zone's load ratio share (% of annualized  
4 SPP system monthly peak load).

5 Based on the \$66 million cost estimate provided by Mr. Harrison, the impact to an  
6 "average" Westar residential customer using 1000 kWh/month will peak at \$0.67 per  
7 year in 2016 and decline by approximately 2.5% per year [over a 40-year period]  
8 thereafter due to depreciation.<sup>10</sup>

9 **Q. On the surface, this Application appears to be very favorable for Kansas ratepayers.**  
10 **You stated that ratepayers in Kansas can essentially expect to pay less than 20% of**  
11 **a \$66 million project and Westar ratepayers can expect to pay \$0.67 in the first, and**  
12 **highest, year of a 40-year investment. Is there anything else the Commission should**  
13 **be aware of as it considers the Application?**

14 **A.** Yes. The Westar analysis appropriately reflects the cost of the line that is the subject of  
15 the instant Application. Nonetheless, the Commission may wish to be mindful that  
16 Westar ratepayers will also be paying 11.2% of \$39.5 million for ITCGP/Mid-Kansas'  
17 regionally funded upgrades (Upgrades 50425 and 50427) in the Elm Creek to Summit  
18 Project. Also, the entire Elm Creek to Summit Project is included in the 2012 ITP10  
19 Report and there are eight additional, regionally funded projects in the same portfolio.<sup>11</sup>  
20 As originally approved, the other regionally funded projects (over 300 kV) with  
21 Conditional Notices to Construct in the 2012 ITP10 Report totaled approximately \$900

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<sup>9</sup> *Ibid.* Reed Direct, p. 8, line 3.

<sup>10</sup> *Ibid.* Lines 6-23.

<sup>11</sup> 2012 Integrated Transmission Plan, 10-Year Assessment Report, January 31, 2012, p. 10. (Staff Exhibit TBD-1)



1 million.<sup>12</sup> None of the additional projects will be constructed in Kansas, but Kansas  
2 customers will pay approximately 20% of the recovery costs for these projects in addition  
3 to the recovery costs of the Elm Creek to Summit Project.

## 4 **II. Necessity, Benefits, and Economic Development**

5 **Q. How was the necessity of the Elm Creek to Summit Project determined?**

6 A. SPP is a FERC jurisdictional Regional Transmission Organization (RTO) and  
7 transmission expansion planning is a fundamental role of RTOs. SPP is also a regulated  
8 electric public utility under the laws of Kansas and is authorized conduct transmission  
9 system planning for other electric public utilities in Kansas.<sup>13</sup> The necessity for the  
10 overall project with five underlying upgrades was determined by SPP Engineering  
11 through the Integrated Transmission Planning (ITP) process. ITP is an iterative three-  
12 year process that includes 20-year and 10-year Assessments with consecutive 18-month  
13 study cycles; and “Near Term” assessments every year. The Elm Creek to Summit  
14 Project is one of multiple projects in the 2012 ITP10 Report that was approved by the  
15 SPP Board of Directors in January 2012.

16 **Q. Is this project necessary?**

17 A. Yes. I believe the Elm Creek to Summit Project is primarily necessary for future  
18 reliability reasons. According to the 2010 ITP10 Assessment, many issues were  
19 identified for the eastern portion of the state of Kansas during the next ten years. The  
20 majority of these issues were related to congestion on lower voltage transmission lines  
21 and resulted in the study of eight (8) other potential projects in Kansas, most of which

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<sup>12</sup> *Ibid.* 2012 ITP10 Report, Table 19.4 [less transformers and lines below 300 kV], p. 138

<sup>13</sup> Docket No. 06-SPPE-203-COC, In the Matter of the Application of Southwest Power Pool, Inc for a Certificate of Convenience and Authority for the Limited Purpose of Managing and Coordinating the Use of Certain Transmission Facilities Located within the State of Kansas; Commission Order, September 19, 2006.

1        were rejected for this ITP study cycle. The Elm Creek to Summit Project was approved  
2        because it resolves a potential violation of reliability criteria (low voltage, “voltage  
3        collapse”) on other lower capacity transmission lines in the Concordia vicinity that would  
4        be caused by the loss of the 230 kV line between Northwest Manhattan and Elm Creek  
5        substations.<sup>14</sup>

6        **Q. Was the Elm Creek to Summit line studied separately from other proposed projects**  
7        **in the SPP Region?**

8        A. Every project is evaluated through a comparison of how the transmission models operate  
9        with the project in the system, and then, with the project removed from the system. The  
10       Elm Creek to Summit Project was eventually approved last year as one of nine “major”  
11       projects located throughout the SPP region in the 2012 ITP10 Report.<sup>15</sup> In total, the  
12       recommended 2012 ITP10 portfolio was estimated to be \$1.5 billion for engineering and  
13       construction cost and included projects needed to meet potential reliability, economic,  
14       and public policy.<sup>16</sup>

15       **Q. What are the benefits of the Elm Creek to Summit Project?**

16       A. As demonstrated in the 2012 ITP10 Report, future reliability is the most important benefit  
17       of the Elm Creek to Summit Project that is directly assignable to ratepayers and/or  
18       “consumers in Kansas and consumers outside the state”.<sup>17</sup> In the study, all the reliability  
19       upgrades were evaluated in the economic model to determine economic benefit and  
20       replaced with economic projects where possible.<sup>18</sup> However, in the final “2012 ITP10  
21       Recommended Project List”, the upgrade assigned to Westar was designated as a

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<sup>14</sup> *Ibid.* 2012 ITP10 Report, p. 52

<sup>15</sup> *Id.*, p. 10.

<sup>16</sup> *Id.*, p. 9.

<sup>17</sup> *Ibid.* K.S.A. 66-1,180 (see footnote 1 for text).

<sup>18</sup> *Ibid.* 2012 ITP10 Report, Reliability and Economic Efficiencies, pp. 33-34.

1 “Regional Reliability” upgrade<sup>19</sup>, or in other words, in SPP’s economic modeling, the  
2 benefit to cost ratio of the project was less than 1.0.

3 While operational reliability is the primary benefit to both consumers in Kansas and  
4 consumers outside the state, a reliable transmission system is essential to accommodate  
5 future load growth and economic growth, as stated in the Direct Testimony of Kelly B.  
6 Harrison.<sup>20</sup> I also agree with Mr. Harrison that the Elm Creek to Summit Project “will  
7 provide for more efficient use of existing generation resources and reduce line losses.”<sup>21</sup>

8 **Q. Does the Elm Creek to Summit Project contribute to economic development when**  
9 **considered as indicated by K.S.A 66-1,180?**

10 A. This \$66 million project will contribute to economic development. In economic  
11 development studies, the initial cost of a project is typically captured as a benefit (cost =  
12 benefit) and then extrapolated from that basis to calculate other likely economic benefits.  
13 As concluded by SPP in testimony in a previous docket, “These models are classic input-  
14 output models commonly used by economists, state and federal governments, and state  
15 economic development departments to estimate potential economic impacts of  
16 projects”.<sup>22</sup> Transmission projects in this light would be no different from any other type  
17 of project, in that, if any investment is made and cost recovery can be reasonably  
18 expected, there will be economic development benefits. While it may be a fundamental  
19 economic fact that investing money will likely produce economic development, Staff  
20 believes such analyses should be of secondary value for determining whether a specific  
21 transmission system upgrade is necessary—or not necessary.

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<sup>19</sup> *Id.* 2012 ITP10 Recommended Project List, p.131.

<sup>20</sup> Direct Testimony of Kelly B. Harrison, p.4, line 15.

<sup>21</sup> *Ibid.* p.4 , lines 19-20.

<sup>22</sup> Docket No. 11-ITCE-644-MIS, Direct Testimony of Katherine Prewitt, Director, Planning, Southwest Power Pool, Inc., p.17, lines 13-15

### **III. Project Tracking**

**Q. Are there additional matters the Commission should consider in the Joint Application for siting approval?**

A. Yes. Staff requests the Commission continue a requirement for quarterly transmission project status reporting as established in previous line siting Orders. Such reports would be general in nature and include, but not be limited to, adherence with construction schedule, expenditures to date, materials procurement, easement acquisition, and changes in cost estimates. The reports would be required until such time as the project is in service and the final engineering and construction costs are known and posted in rates. Typically, status reports have been submitted as “confidential” and continuation of this practice is acceptable to Staff.

**Q. Has the Commission previously considered reporting requirements for transmission projects subject to line siting approval?**

A. Commission Orders in previous dockets have included a provision requiring quarterly reporting of project status.<sup>23</sup> In Docket No. 10-ITCE-557-MIS, the Commission Order ¶77 found “...that such information is important in understanding the complete impact of an electric transmission line and that reporting of such information should be included as part of a siting application proceeding.”

**Q. Please summarize your testimony.**

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<sup>23</sup> Docket No. 10-ITCE-557-MIS, In the Matter of the Application of ITC Great Plains, LLC for Siting Permit for the Construction of a 345-kV Transmission Line in Ellis, Rooks, Osborne and Smith Counties, Kansas; Commission Order, Conclusion (C), June 30, 2010. Docket No. 11-ITCE-644-MIS, In the Matter of the Application of ITC Great Plains, LLC for a Siting Permit for the Construction of a Double-Circuit 345-kV Transmission Line in Ford, Clark, Kiowa and Barber Counties, Kansas; Commission Order, Conclusion (C), July 12, 2011. Docket No. 11-PWTE-600-MIS, In the Matter of the Application of Prairie Wind Transmission, LLC for a Siting Permit for the Construction of a Double Circuit 345 kV Transmission Line in Sedgwick, Sumner, Harper, and Barber Counties, Kansas; Commission Order, Conclusion (C), June 28, 2011.

1   A.   Staff believes this important transmission project is necessary and recommends the  
2       Commission approve the Application. The project will assure the benefit of continued  
3       future reliability to customers in the SPP Region. It is also produce associated economic  
4       development benefits to Kansas and the SPP region.

5       Staff also recommends the Commission conclude in its Order that quarterly project status  
6       reports will be required until such time as the project is in service and the final  
7       engineering and construction are known and posted in rates.

8   **Q.   Does this conclude your testimony?**

9   A.   Yes.

**Staff Exhibit TBD-1**

**Docket No. 13-WSEE-676-MIS**

**2012 Integrated Transmission  
Plan 10-Year Assessment  
Report**

January 31, 2012

Engineering

NOTE: The 140-page report is available using the following link:

<http://www.spp.org/publications/20120131%202012%20ITP10%20Report.pdf>

## **CERTIFICATE OF SERVICE**

13-WSEE-676-MIS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Direct Testimony of Thomas B. DeBaun was served by electronic service on this 31st day of May, 2013, to the following parties who have waived receipt of follow-up hard copies.

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**CERTIFICATE OF SERVICE**

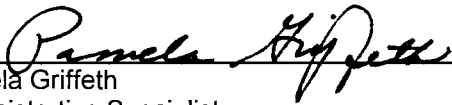
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