2012.05.14 16:12:26 Kansas Corporation Commission 787 Patrice Petersen-Klein

BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Received on

MAY 1 4 2012

In the Matter of the Application of Mid-Kansas Electric Company, LLC for Approval to Make Certain Changes in its Charges for Electric Services in the Geographic Service Territory Served by Western Cooperative Electric Association, Inc. by State Corporation Commission of Kansas

Docket No. 12-MKEE-491-RTS

DIRECT TESTIMONY OF

)

STACEY HARDEN

ON BEHALF OF

CITIZENS' UTILITY RATEPAYER BOARD

MAY 14, 2012

TABLE OF CONTENTS

Page Statement of Qualifications I. 3 Purpose of Testimony II. 4 III. Summary of Conclusions 4 IV. Discussion of the Issues 5 **Donation Expense** 5 A. Lobbying Expense B. 6 Advertising Expense C. 7 Entertainment Expense D. 8 E. Outside Services Expense 8 F. Bad Debt Expense 9 Rate Case Expense G. 9 H. Depreciation Expense 10 I. Local Access Charge 11 V. Summary of Revenue Requirements 13

- Appendix A Supporting Schedules
- Appendix B Referenced Data Requests

I. <u>STATEMENT OF QUALIFICATIONS</u>

2	Q.	Please state your name and business address.
3	A.	My name is Stacey Harden. My business address is 1500 SW Arrowhead Road, Topeka,
4		Kansas, 66604.
5		
6	Q.	By whom and in what capacity are you employed?
7	A.	I am employed by the Citizens' Utility Ratepayer Board ("CURB") as a Regulatory
. 8		Analyst.
9		
10	Q.	Please describe your educational background.
11	A.	I received a Bachelor of Business Administration degree from Baker University in
12		2001. I received a Master of Business Administration degree from Baker University
13		in 2004.
14		
15	Q.	Please summarize your professional experience.
16	A.	I joined the Citizens' Utility Ratepayer Board as a Regulatory Analyst in February
17		2008. Prior to joining CURB, I was the manager of a rural water district in Shawnee
18		County, Kansas for five years. I am currently an adjunct faculty member at Friends
19		University, where I am an undergraduate instructor in business and accounting courses
20		such as Data Development and Analysis, Financial Decision Making, Fundamental
21		Financial Accounting Concepts, Financial Reporting of Assets, Debt & Equity, and
22		Managerial Statistics.
23		

1	Q.	Have you previously testified before the Commission?
2	A.	Yes. I previously offered testimony in KCC Docket Nos. 08-WSEE-1041-RTS, 10-
3		KGSG-421-TAR, 10-EPDE-497-TAR, 10-BHCG-639-TAR, 10-SUBW-602-TAR, 10-
4		WSEE-775-TAR, 10-KCPE-795-TAR, 10-KCPE-415-RTS, 11-SUBW-448-RTS, and
5 ົ		12-SUBW-359-RTS.
6		
7	II.	PURPOSE OF TESTIMONY
8	Q.	What is the purpose of your testimony?
9	Α.	On February 1, 2012, Mid-Kansas Electric Company ("MKEC" or "Company") filed an
10		Application with the State of Kansas Corporation Commission ("KCC" or
11		"Commission") seeking a rate increase for the geographic service territory served by
12		Western Cooperative Electric Association, Inc. ("Western"). The Company requested a
13		rate increase of \$729,416 or 4.2%.
14		The purpose of my testimony is to support various accounting adjustments as well
15		as CURB's overall revenue requirement recommendation. My testimony will incorporate
16		the recommendations made by CURB witness Ms. Andrea Crane in her direct testimony.
17		
18	III.	SUMMARY OF CONCLUSIONS
19	Q.	What is your recommendation to the Commission regarding Western's application
20.		to raise rates?
21	A.	Based upon my analysis of the filing and other documentation in this case, I recommend
22		the Commission:
23		• Approve the adjustments to be set forth in my testimony;

1		• Approve an operating times interest earned ratio ("O-TIER") of 1.5 as set forth in					
2		Ms. Andrea Crane's direct testimony;					
3		• Approve an operating margin of no more than \$698,671, as set forth in Ms.					
4		Andrea Crane's direct testimony;					
5		• Approve a rate increase of no more than \$422,134 for Western.					
6							
7	IV.	DISCUSSION OF THE ISSUES					
8	•	A. <u>DONATION EXPENSE</u>					
9	Q.	Did Western include any donations or charitable contributions in its revenue					
10		requirement claim?					
11	А.	Yes it did. The Company's response to CURB Data Request 24 shows that \$8,034 of					
12		charitable contribution expense is included in the company's revenue requirement claim.					
13							
14	Q.	Is it appropriate to include charitable contributions in a utility's revenue					
15		requirement?					
16	A.	No, it is not. Charitable contributions and donations are not costs that are necessary for					
17		the provision of safe and reliable utility service.					
18							
19	Q.	Has the Commission previously required of a portion of charitable contributions or					
20		donations be removed from the utility's cost of service?					
21	А.	Yes. In the past the Commission has generally required regulated utilities to exclude					
22		50% of its charitable contributions or donations from the utility's cost of service. These					
23	•	costs are inappropriate as they are not necessary for the provision of safe and reliable					

1		utility service. The Commission policy is to eliminate these expenses and conforms with
2		K.S.A. 66-101f(a). ¹
3		
4	Q.	Did Western make an adjustment to eliminate 50% of its charitable contributions
5		from its cost of service?
6	А.	No, it did not.
7		
8	Q.	Did you make an adjustment to eliminate 50% of the Western Division's charitable
9		contributions from its cost of service?
10	A.	Yes, I did. As detailed in Schedule SMH-2, I have removed 50%, or \$4,017, of Western's
11		charitable contributions from its cost of service.
12	·	
13		B. <u>LOBBYING EXPENSE</u>
14	Q.	Did Western include any lobbying costs in its revenue requirement?
15	A.	Yes. In its response to CURB Data Request 26, the company indicated that it does not
16		directly contribute to lobbying organizations. The only lobbying expenses Western
17		supports are through the lobbying activities carried out by Kansas Electric Cooperative
18		("KEC") and NRECA to which Western pays dues.
19		
20		
21		

¹ K.S.A. 66-101 f(a) states: "For the purposes of determining just and reasonable rates, the Commission may adopt a policy of disallowing a percentage, not to exceed 50% of utility dues, donations and contributions to charitable, civic and social organizations and entities, in addition to disallowing specific dues, donations and contributions which are found unreasonable or inappropriate."

1	Q.	What percentage of the dues paid by Western to KEC and NRECA are attributed to
2		lobbying?
3	А.	According to the Company's response to Staff Data Request No. 88, 19.44% of the dues
4		paid to KEC are attributed to lobbying, while 20% of the dues paid to NRECA are
5		attributed to lobbying.
6		
7	Q.	Is it appropriate to include lobbying costs in the utility's cost of service?
8	A.	No, it is not. Lobbying expenses are not necessary for the provision of safe and reliable
9		utility service and therefore should not be included in the utility's cost of service.
10		
11	Q.	What adjustment did you make to remove Western's lobbying expenses from its
12		cost of service?
13	A.	As detailed in schedule SMH-3, I have removed 19.44% of the dues paid to KEC and
14		20% of the dues paid to NRECA. This adjustment is \$8,002 and \$1,369 for KEC and
15		NRECA, respectively.
16		
17		C. <u>ADVERTISING EXPENSE</u>
18	Q.	Are you recommending any adjustment to the Western's advertising costs?
19	A.	Yes. As detailed in schedule SMH-4, I have removed \$1,266 in advertising costs. In
20		its response to CURB Data Request 27, Western identified \$4,565 in advertising costs.
21		Western classified \$1,266 of these costs as corporate image and safety. In my opinion,
22		advertising for the purpose of corporate image is not necessary to the provision of safe

1		and reliable utility service. Therefore, I have made an adjustment to remove the \$1,266 of				
2		corporate image and safety advertising costs from Western's cost of service.				
3						
4		D. <u>ENTERTAINMENT EXPENSES</u>				
5	Q.	Does Western include any entertainment expenses in its cost of service?				
6	Α.	Yes. In its response to KCC Data Request 60, Western indicates that it provides an				
7		annual winter party for its employees. The expense for this party was \$1,394, which paid				
8		for facility rentals and meals. In addition, Western paid \$29 for the meal of an employee				
9		who was unable to attend the winter party because he was on-call. ²				
10						
11	Q.	Is it appropriate to include costs of an employee party in the utility's cost of service?				
12	A.	No it is not. Providing employees with a holiday party is not related to the provision of				
13		safe and reliable utility service and should not be paid for by ratepayers. Therefore I have				
14		made an adjustment to remove \$1,423 from Western's cost of service. ³				
15						
16		E. <u>OUTSIDE SERVICE EXPENSE</u>				
17	Q.	Are you recommending an adjustment to Western's outside service expense?				
18	A.	Yes. In its response to KCC Data Request 151, the Company identified \$713 in				
19		payments made to its attorney as non-recurring charges. Additionally, Western identified				
20		\$3,001 in outside service expenses for the completion of a power system study. Western				
21		indicates that that these charges will be recurring, but not on an annual basis. Because				

² Western response to KCC Data Request No. 127. ³ Schedule SMH-5

1		these expenses are one-time or non-recurring expenses and therefore not known and
2		measurable, it is inappropriate to include them in the utility's cost of service. Therefore,
3		as detailed in schedule SMH-6, I have removed \$3,714 from Western's cost of service.
4		
5		F. <u>BAD DEBT EXPENSE</u>
6	Q.	Are you recommending an adjustment to Western's bad debt expense?
7	A.	Yes. As detailed in Schedule SMH-7, I have made a \$5,875 reduction to
8		Western's bad debt expense.
9		
10	Q.	How did you calculate your adjustment to Western's bad debt expense?
11	А.	First I calculated the three year average of Western's bad debt ratios, which were
12		provided in its response to KCC Data Request 97. I then applied the three year average to
13		Western's pro forma sales of electricity as provided in Exhibit RJM-WE-2. The result is
14		bad debt expense of \$16,925. During the 2010 test year, Western recorded \$22,800 in bad
15		debt expense. My adjustment of \$5,875 reduces Western's bad debt expense as calculated
16		in Schedule SMH-X.
17		
18		G. <u>RATE CASE EXPENSE</u>
19	Q.	What was Western's estimate for rate case expense in its application?
20	A.	According to Exhibit RJM-WE-2, page 21, Western estimated its total rate case expense
21		at \$50,000, to be amortized over a three year period.
22		
23		\cdot

1	Q.	Is Western's original estimate of \$50,000 still accurate?			
2	A.	No. In its response to KCC Data Request 145, Western provided actual rate case			
3		expenses for this proceeding through March 2012. According to its response, Western has			
4		incurred \$66,993.27 in rate case expenses through March 2012.			
5					
6	Q.	Did Western include internal payroll costs in its actual rate case expense?			
7	A.	Yes. \$6,726.04 of its actual rate case expense included in its response to KCC Data			
8		Request 145 is for internal labor. Because Western's internal labor costs are already			
9		included in Western's payroll expenses, they should not be included in Western's rate			
10		case expense claim.			
11					
12	Q.	What is your adjustment to Western's rate case expense?			
12 13	Q. A.	What is your adjustment to Western's rate case expense? As detailed in Schedule SMH-8, I have increased Western's rate case expense to			
13		As detailed in Schedule SMH-8, I have increased Western's rate case expense to			
13 14		As detailed in Schedule SMH-8, I have increased Western's rate case expense to \$60,267. Western's actual rate case expense will be amortized over a three year period,			
13 14 15		As detailed in Schedule SMH-8, I have increased Western's rate case expense to \$60,267. Western's actual rate case expense will be amortized over a three year period, which results in an annual recovery of \$20,089. My adjustment of \$3,422 increases the			
13 14 15 16		As detailed in Schedule SMH-8, I have increased Western's rate case expense to \$60,267. Western's actual rate case expense will be amortized over a three year period, which results in an annual recovery of \$20,089. My adjustment of \$3,422 increases the			
13 14 15 16 17		As detailed in Schedule SMH-8, I have increased Western's rate case expense to \$60,267. Western's actual rate case expense will be amortized over a three year period, which results in an annual recovery of \$20,089. My adjustment of \$3,422 increases the annual adjustment for rate case expense by \$3,422.			
13 14 15 16 17 18	A .	As detailed in Schedule SMH-8, I have increased Western's rate case expense to \$60,267. Western's actual rate case expense will be amortized over a three year period, which results in an annual recovery of \$20,089. My adjustment of \$3,422 increases the annual adjustment for rate case expense by \$3,422. H. DEPRECIATION EXPENSE			
 13 14 15 16 17 18 19 	А. Q.	As detailed in Schedule SMH-8, I have increased Western's rate case expense to \$60,267. Western's actual rate case expense will be amortized over a three year period, which results in an annual recovery of \$20,089. My adjustment of \$3,422 increases the annual adjustment for rate case expense by \$3,422. H. <u>DEPRECIATION EXPENSE</u> Did you make an adjustment to Western's depreciation expense?			

1		Pioneer assets. If the Commission approves Ms. Crane's depreciation adjustment in the				
2		380 Docket, a similar adjustment to be made to Western's depreciation expense.				
3						
4		I. LOCAL ACCESS CHARGE				
5	Q.	What is the LAC?				
6	A.	The LAC is the rate paid by wholesale customers utilizing Western's 34.5 kV facilities.				
7						
8	Q.	How is the LAC rate determined?				
9	A.	As shown in Exhibit RJM-WE-5, the LAC rate is determined by first developing a				
10		revenue requirement associated with the provision of 34.5 kV service, based upon the pro				
11		forma costs of the Company and relevant allocation factors. This revenue requirement is				
12		then divided by the total wholesale and retail monthly billing demand to develop a pro				
13		forma demand rate. That rate is then applied to the LAC billing determinants to				
14	•	determine how much of the revenue requirement should be recovered from wholesale				
15		customers. The remainder of the Company's total revenue requirement is recovered from				
16		retail ratepayers.				
17						
18	Q.	What LAC rate did Western propose in its application?				
19	A.	Western proposed an LAC rate of \$1.03 per kW-month. The proposed rate is				
20		considerably less than the \$1.41 per kW-month rate that utilized during the 2010 test				
21		year.				
22						
23						

1	Q.	Did you make an adjustment to the Company's proposed LAC rate?
2	A.	Yes. I made an adjustment to reflect the impact of both mine and Ms. Crane's
3		adjustments to expenses, interest, and margin adjustments. My calculation, which is
4		detailed in Schedule SMH-10, results in an LAC rate of \$0.89 per kW-month. ⁴
5		
6	Q.	What impact does your calculated LAC have on Western's revenue requirement?
7	A.	If the Commission approves the LAC rate I calculated in Schedule SMH-10, it would
8		result in Western collecting \$194,697 less - or 37% - from LAC customers than it did
9		during the 2010 test year. I recommended the Commission award Western no more than a
10		\$422,134 increase in its total revenue requirement. If the Commission approves an LAC
11		rate of \$0.89 per kW-month for Western's LAC customers, Western's retail customers
12		will absorb the entire revenue requirement increase, as well as the decreased revenues
13		from LAC customers. This scenario would result in a rate increase to retail customers of
14		\$616,831.
15		
16	Q.	What LAC rate do you recommend be authorized by the Commission?
17	A.	I recommend the Commission leave the previously approved LAC rate of \$1.41 per kW-
18		month in place in order to avoid shifting more than 100% of the recommended revenue
19		requirement increase onto Western's retail customers.
20		
21		

⁴ Schedule SMH-10

1 V.

SUMMARY OF REVENUE REQUIREMENTS

2 Q. Please summarize the impact of the adjustments you are recommending for
3 Western.

4 A. As summarized in Schedule SMH-1, I recommend the KCC approve a total rate

5 increase for Western of \$422,134. Further, I recommend the Commission leave the

6 previously approved LAC rate of \$1.41 per kW-month in place. This will result in a retail
7 rate increase of \$422,134.

8

9 Q. Does this conclude your testimony?

10 A. Yes.

VERIFICATION

)

)

STATE OF KANSAS

COUNTY OF SHAWNEE

I, Stacey Harden, of lawful age, being first duly sworn upon her oath states:

ss:

That she is a regulatory analyst for the Citizens' Utility Ratepayer Board, that she has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.

Stacey Harden

SUBSCRIBED AND SWORN to before me this 14th day of May 2012.

Notary Public

DELLA J. SMITH Notary Public - State of Kansas My Appt. Expires January 26, 2013

My Commission expires: 01-26-2013.

<u>APPENDIX A</u>

SUPPORTING SCHEDULES

SMH-1 – SMH-10

MID-KANSAS ELECTRIC COMPANY WESTERN DIVISION

TEST YEAR ENDING DECEMBER 31 2010

REVENUE REQUIREMENT SUMMARY

			Company				CURB
Line			Pro Forma	Recommended		1	Pro Forma
No.	Description	Present Rates		Adjustment		P	resent Rates
1	Operating Revenue		(A)				
2	Sales of Electricity	\$	17,368,610			\$	17,368,610
3	Consumer Penalties		22,306				22,306
4	Other		30,848				30,848
5	Total Operating Revenue	\$	17,421,764			\$	17,421,764
6							
7	Operating Expenses						
8	Cost of Purchased Power	\$	13,241,628			\$	13,241,628
9	Transmission - O & M		189,752				189,752
10	Distribution - Operation		968,154				968,154
. 11	Distribution - Maintenance		777,125	•			777,125
12	Consumer Accounts		391,159				391,159
13	Consumer Service & Information		104,508				104,508
14	Sales		-				-
15	Administrative & General		727,969	(22,243)	(A)		705,726
16	Depreciation & Amortization		735,617				735,617
17	Taxes - Property		-				-
18	Taxes - Other		-				-
19	Interest on Long Term Debt		491,856	(26,075)	(B)		465,781
20	Other Interest Expense		31,558				31,558
21	Other Deductions		· –				
22	Total Operating Expenses	\$	17,659,325			\$	17,611,008
26	Long Term Interest	\$	491,856	(26,075)	(B)	\$	465,781
27	Target O-TIER		2.0		(C)		1.5
28	Net Margins Excluding Interest	\$	983,712		(D)	\$	698,672
29	Total Revenue Requirements	\$	18,151,181			\$	17,843,899
30	Tariff Revenue		17,368,610				17,368,610
31	Other Operating Revenue		53,155				53,155
32	Total Revenue	\$	17,421,765			\$	17,421,765
33	Required Increase	\$	729,416			\$	422,134
	Percent Increase		4.2%				2.4%

(A) Schedule SMH-2

(B) Schedule ACC-1, attached to Direct Testimony of Andrea Crane

(C) Schedule ACC-2, attached to Direct Testimony of Andrea Crane

(D) Schedule ACC-2, attached to Direct Testimony of Andrea Crane

MID-KANSAS ELECTRIC COMPANY WESTERN DIVISION

TEST YEAR ENDING DECEMBER 31 2010

OPERATING EXPENSE ADJUSTMENTS

	. <u> </u>	SCHEDULE
1. Donations Expense	(\$4,017)	SMH-2
2. Lobbying Expense	(\$9,371)	SMH-3
3. Advertising Expense	(\$1,266)	SMH-4
4. Entertainment Expense	(\$1,423)	SMH-5
5. Outside Service Expense	(\$3,714)	SMH-6
6. Bad Debt Expense	(\$5,875)	SMH-7
7. Rate Case Expense	\$3,422	SMH-8
8. Total Expense Adjustments	(\$22,243)	

MID-KANSAS ELECTRIC COMPANY WESTERN DIVISION

TEST YEAR ENDING DECEMBER 31 2010

DONATIONS EXPENSE

1. Company Claim	\$8,034	(A)
2. Sharing Percentage	50%	(B)
3. Recommended Adjustment	(\$4,017)	

Sources:

(A) Western Response to CURB 24

(B) Reflects Commission policy

MID-KANSAS ELECTRIC COMPANY WESTERN DIVISION

TEST YEAR ENDING DECEMBER 31 2010

LOBBYING EXPENSE

1. Total Dues paid to KEC	\$41,164	(A)
2. Lobbying Allocation	19.44%	(B)
3. KEC Dues allocated to Lobbying	\$8,002	
3. Total Dues paid to NRECA	\$6,843	(A)
4. Lobbying Allocation	20.00%	(B)
5. NRECA Dues allocated to Lobbying	\$1,369	
6. Recommended Adjustment	(<u>\$9,371</u>)	

Sources:

(A) Western Response to KCC 88

(B) Western Response to KCC 88

MID-KANSAS ELECTRIC COMPANY WESTERN DIVISION

TEST YEAR ENDING DECEMBER 31 2010

ADVERTISING EXPENSE

1. Total Advertising Costs	\$4,565	(A)
2. Contact Information Listing	(445)	(A)
3. Franchise Required Notifications	(\$2,466)	(A)
3. RUS Required Notifications	(\$388)	(A)
6. Recommended Adjustment	(\$1,266)	

Sources:

(A) Western Response to CURB 27

MID-KANSAS ELECTRIC COMPANY WESTERN DIVISION

TEST YEAR ENDING DECEMBER 31 2010

ENTERTAINMENT EXPENSES

3. Recommended Adjustment	(\$1,423)	
2. Meal provided for on-call employee	\$29	(B)
1. Winter Party for Employees	\$1,394	(A)

Sources:

(A) Western Response to KCC 60

(B) Western Repsonse to KCC 127

MID-KANSAS ELECTRIC COMPANY WESTERN DIVISION

TEST YEAR ENDING DECEMBER 31 2010

OUTSIDE SERVICE EXPENSE

1. Non-Recurring, one-time Legal Expenses	\$713	(A)
2. Rate Consultant, non-annual expense	\$3,001	(A)
3. Recommended Adjustment	(\$3,714)	

Sources: (A) Western Response to KCC 151

MID-KANSAS ELECTRIC COMPANY WESTERN DIVISION

TEST YEAR ENDING DECEMBER 31 2010

BAD DEBT EXPENSE

3. Recommended Adjustment	(\$5,875)	
4. Company claim - 2010 test year	\$22,800	(C)
3. Bad Debt Expense	\$16,925	
2. Bad Debt Ratio (three year average)	0.097447%	(B)
1. Pro Forma Test Year Sales of Electricity	\$17,368,610	(A)

Sources:

(A) Exhibit RJM WE 2, page 1

(B) Western Response to KCC 97

(C) Western Reponse to KCC 97

MID-KANSAS ELECTRIC COMPANY WESTERN DIVISION

TEST YEAR ENDING DECEMBER 31 2010

RATE CASE EXPENSE

1. Actual Rate Case Expense (through March 2012)	\$66,993	(A)
2. Internal Labor	(\$6,726)	(A)
3. Rate Case Expense (through March 2012)	\$60,267	
4. Three Year Amortization of Rate Case Expense	\$20,089	(B)
5. Company's amortized rate case expense	\$16,667	
6. Recommended adjustment	\$3,422	

Sources:

(A) Western Repsonse to KCC 145

(B) \$60,267 in actual rate case expense divided by three years

(C) Exhibit RJM WE-2, page 21

Western Cooperative Electric Association, Inc. MKEC Area Local Access Charge Revenue Requirements

Test Year January 1, 2010 to December 31, 2010 Adjusted for Known and Measurable Changes

	A	ujusieu ior Known anu j		0			
			Total		ion Factor	Allocated	Percent
<u>Line</u>	Description	Source	<u>MKEC Area</u>	<u>Name</u>	Factor	<u>to LAC</u>	<u>of Total</u>
1	Operating Expenses						
2	Transmission O&M	Ex. RJM-WE-5, pg 1	\$ 189,752		1.000000	\$ 189,752	28.89%
3	Distribution O&M	Ex. RJM-WE-5, pg 1	1,745,279	DOM	0.000000		0.00%
4	Administration & General	Ex. RJM-WE-5, pg 1	705,726	LAB	0.014353	10,130	1.54%
5	Depreciation						
6	Transmission	Ex. RJM-WE-5, pg 3	207,819		1.000000	207,819	31.64%
7	Distribution (LAC Only)	Ex. RJM-WE-5, pg 3	-		1.000000	-	0.00%
8	General Plant	Ex. RJM-WE-5, pg 3	127,345	LAB	0.014353	1,828	0.28%
9	Taxes	Ex. RJM-WE-5, pg 1	-	NP	0.354036	-	0.00%
10	Subtotal Operating Expense	Sum(L2:L9)				\$ 409,528	
11							
12	L.T. Interest Expense	Ex. RJM-WE-5, pg 1	465,781	NP	0.354036	\$ 164,903	25.10%
13	Operating TIER Requirement	,				1.5	
14	Margin Requirement	L12 * (L13 - 1.0)				\$ 82,452	12.55%
15					-		
16	Total Revenue Requirements	L10 + L12 + L14				\$ 656,883	100.00%
17	·						
18	Billing Demand	Ex. RJM-WE-5, pg 5				735,032	kW
19							•
20	Average Cost	L16 / L18				0.89	/kW/mo
21							
22	Billing Determinants for LAC	Ex. RJM-WE-5, pg 5				374,418	kW
23							
24	LAC Revenues under proposed LAC Rate	L20*L22				\$ 333,232	
25							
26	LAC Revenues at present rates	Table 2, Macke Direct				\$ 527,929	
27							
28	Decreased Revenues from proposed LAC Rate	L26-L24				\$ (194,697)	

SCHEDULE SMH-10

APPENDIX B

Referenced Data Requests

CURB DR-24 CURB DR-26 CURB DR-27

KCC STAFF DR-60 KCC STAFF DR-88 KCC STAFF DR-97 KCC STAFF DR-127 KCC STAFF DR-145 KCC STAFF DR-151

Citizens' Utility Ratepayer Board Data Request

Request No: CURB-24

Company Name

Mid-Kansas Electric Company, LLC and Western Cooperative Electric Association, Inc.

Docket Number

12-MKEE-491-RTS

Request Date

February 15, 2012

Date Information Needed February 29, 2012

Please Provide the Following:

Please itemize all charitable contributions included in the Company's actual test year expenses.

Response:

Please see attached excel file (CURB DR #24 DONATIONS & CONTRIBUTIONS.XLS)

Submitted By David Springe

Submitted To Mark Calcara

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Citizens' Utility Ratepayer Board any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: Name: Position: Date:

Western Cooperative Electric DR #42

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Company	Processin Ye	ar i	Account # Journal	Description	Amount
02	1	2010	908 BLPMT	KEC YOUTH TOUR HOTEL CR	(126.40)
02	2	2010	908 A/P	YOUTH TOUR COLO/ KANSAS ELE 119276	1,333.33
02	· 2	2010	930.1 A/P	DONATION 3 ELECT LUCAS-LURA 021510	300.00
02	2	2010	930.1 A/P	DONATION TO SCOR SYLVAN GRO 021610	150.00
02	3	2010	930.1 A/P	DONATION TO FADD NATOMA HIG 030910	150.00
02	4	2010	908 A/P	YOUTH CONTEST FIRST NATI 03/10 DAVE	65.73
02	4	2010	909 A/P	ELECTRORALLY-GRE DEINES DEN 042210	66.67
02	6	2010	930.1 A/P	13 County Direct CENTRAL PU 062310	173.33
02	7	2010	930.1 A/P	2010 GOLF OPEN- KCRE-KS CO 071910	100.00
02	8	2010	908 A/P	COLTON MCNICH SC SOUTHWESTE 081810	125.00
02	8	2010	908 A/P	DAL SCHULTZ SCHO DODGE CITY 081810	125.00
02	8	2010	908 A/P	DANIELLE WEBER I UNIVERSITY 081810	125.00
02	8	2010	908 A/P	SCHOLARSHIP + HA MANHATTAN 081810	512.50
02	8	2010	908 A/P	ZACH NEMECHEK SC KANSAS STA 081810	125.00
02	9	2010	908 A/P	RHONDA WEIL SCHO DODGE CITY 090810	500.00
02	9	2010	908 A/P	STEPHANIE WHEELO PRATT COMM 090810	500.00
02	10	2010	908 A/P	DC YOUTH TOURS KANSAS ELE 120762	1,888.31
02	10	2010	909 A/P	HIGH PLAINS RALL SUNFLOWER 16727	231.57
02	10	2010	930.1 A/P	DONATION-ELECTRI HOISINGTON 102010	100.00
02	10	2010	930.1 A/P	DONATION-TROOPS VFW AUXILI 100410	25.00
02	10	2010	930.1 A/P	DONATION-YEARBOO ELLSWORTH 101810	150.00
02	10	2010	930.1 A/P	HIGH PLAINS ELEC DEINES DEN 093010	17.50
02	10	2010	930.1 A/P	KAN AM CHALLENGE DEINES DEN 101010	215.99
02	11	2010	909 A/P	ELECTRORALLY-HAY DEINES DEN 111010	52.5
02	12	2010	908 A/P	COLORADO YOUTH T KANSAS ELE 121196	347.77
02	12	2010	908 A/P	YOUTH TOUR BILL KANSAS ELE 121063	122.74
02	12	2010	908 A/P	YOUTH TOUR MATER KANSAS ELE 121089	207.60
02	12	2010	930.1 A/P	DONATION AFTER P LINCOLN HI 120610	150.00
02	9	2010	930.1 A/P	PROJECT PROM LACROSSE H 091510	150.00
02	9	2010	930.1 A/P	SADD-PROJECT PRO OTIS-BISON 091410	150.00
					8,034.14

Citizens' Utility Ratepayer Board Data Request

Request No: CURB-26

Company Name	Mid-Kansas Electric Company, LLC and Western Cooperative Electric Association, Inc.
Docket Number	12-MKEE-491-RTS
Request Date	February 15, 2012
Date Information Needed	February 29, 2012
Please Provide the Followi	ng:

Please itemize all lobbying expenses included in the Company's actual test year expenses.

Response:

Western Cooperative Electric does not directly contribute to lobbying organizations. The only lobbying expenses Western supports are through the lobbying activities carried out by Kansas Electric Cooperative and NRECA to which Western pays dues. (See DR #25 response)

Submitted By David Springe

Submitted To Mark Calcara

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Citizens' Utility Ratepayer Board any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: Name: Position: Date:

	,		
1:		 	

Citizens' Utility Ratepayer Board Data Request

Request No: CURB-27

Company Name

Mid-Kansas Electric Company, LLC and Western Cooperative Electric Association, Inc.

Docket Number

12-MKEE-491-RTS

Request Date February 15, 2012

Date Information Needed February 29, 2012

Please Provide the Following:

Please itemize all advertising expenses included in the Company's actual test year expenses.

Response:

Please see the attached excel file (CURB DR #27 ADVERTISING.XLSX)

Submitted By David Springe

Submitted To Mark Calcara

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Citizens' Utility Ratepayer Board any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed:	
Name:	
Position:	
Date:	

Western Cooperative Electric DR #45 & #46

Company Proce Year Account # Journal				Description	Purpose	Amount
02	1	2010	930.1 A/P	LOCAL LISTING EL AT&T 010110	Contact Information Listing	3.50
02	2	2010	930.1 A/P	AD IN ELLSWORTH ELLSWORTH 012910	Contact Information Listing	69.95
02	2	2010	930.1 A/P	LOCAL LISTING EL AT&T 020110	Contact Information Listing	3.50
02	2	2010	930.1 A/P	TIMKEN CITY FRAN RUSH COUNT 012110	Franchise Required Notifications	767.70
02	3	2010	930.1 A/P	EL DIRECTORY BAL AT&T 030110	Contact Information Listing	66.20
02	4	2010	908 A/P	ADVERTISING NEX-TECH,I 042310	Contact Information Listing	302.10
02	4	2010	930.1 A/P	CAPS JF BEAVER 66964	Corporate Image	600.00
02	4	2010	930.1 A/P	OLMITZ FRANCHISE GREAT BEND 02634126-001	Franchise Required Notifications	806.76
02	4	2010	930.1 A/P	SAFETY RULERS FO CULVER COM 43691	Safety	245.51
02	7	2010	930.1 A/P	ELLINWOOD LEADER STAR COMMU LEAD52238	Corporate Image	52.00
02	7	2010	930.1 A/P	ELLSWORTH PROGRE ELLSWORTH 062410	Corporate Image	169.95
02	7	2010	930.1 A/P	NONDESCRIMINATIO ELLSWORTH 070110	RUS Required Notifications	57.00
02	7	2010	930.1 A/P	NONDESCRIMINATIO LINCOLN SE 3802	RUS Required Notifications	33.84
02	7	2010	930.1 A/P	NONDESCRIMINATIO PLAINVILLE 070910	RUS Required Notifications	39.88
02	. 7	2010	930.1 A/P	NONDESCRIMINATIO RUSSELL CO 063010	RUS Required Notifications	42.75
02	7	2010	930.1 A/P	NONDESCRIMINATIO STAR COMMU HOIS52287	RUS Required Notifications	54.00
02	7	2010	930.1 A/P	NONDESCRIMINATIO STOCKTON S 070110	RUS Required Notifications	32.94
02	7	2010	930.1 A/P	NONDISCRIMINATIO DOWNS NEWS 070910	RUS Required Notifications	47.25
02	7	2010	930.1 A/P	NONDISCRIMINATIO OSBORNE CO 070910	RUS Required Notifications	33.25
02	7	2010	930.1 A/P	SCHOENCHEN FRANC HAYS DAILY 071810	Franchise Required Notifications	24.50
02	8	2010	930.1 A/P	GALATIA FRANCHIS GREAT BEND 03506173-001	Franchise Required Notifications	13.07
02	8	2010	930.1 A/P	NONDISCRIMINATIO LUCAS PUBL 15332	RUS Required Notifications	29.25
02	8	2010	930.1 A/P	NONDISCRIMINATIO RUSH COUNT 081910	RUS Required Notifications	17.55
02	10	2010	930.1 A/P	GALATIA FRANCHIS DEINES DEN 093010	Franchise Required Notifications	85.00
02	10	2010	930.1 A/P	SAFETY RULERS CULVER COM 44281	Safety	198.46
02	11	2010	930.1 A/P	GALATIA FRANCHIS GREAT BEND 03507668-001	Franchise Required Notifications	769.41
						4 565 32

4,565.32

Kansas Corporation Commission Information Request

Request No: 60

Company Name

MID-KANSAS ELECTRIC COMPANY, LLC

MKEE

Docket Number 12-MKEE-491-RTS

Request Date January 13, 2012

Date Information Needed January 24, 2012

RE: Entertainment Expenses

Please Provide the Following:

1. Please provide a detailed listing of all golf / country club / entertainment expenses included in the test year to include amount(s), date(s), and related account(s).

2. Please provide a detailed listing of all sporting events (e.g. football, basketball, etc.) expenses included in the test year to include amount(s), date(s), and related account(s).

Submitted By Laura Bowman

Submitted To Western

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete

and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:

Date:

Western Cooperative Electric DR #60

Western Cooperative Electric does not pay entertainment expenses for any vendors or customers. Western does provide an annual winter party for employees. The expense for the December 4, 2010 event was \$1,393.60 for facility rental and meals. The charge went to GL account 926.000.

Request No: 88

Company Name	Mid-Kansas Electric Company, LLC and Western Cooperative Electric Association, Inc.			
Docket Number	12-MKEE-491-RTS			
Request Date	February 23, 2012			
Date Information Needed	March 2, 2012			

Please Provide the Following:

Please provide a listing of all membership and subscription expenses incurred during test year. If any associations listed in response to this DR are involved in lobbying, please provide the percentage of dues/payments to the association(s) that are related to lobbying. In addition, please identify the accounts where these expenses were recorded.

Response: Please see excel file (KCC DR #88 DUES – LOBBYING.XLSX)

Submitted By Andria Finger

Submitted To Western

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Citizens' Utility Ratepayer Board any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed:

Stacey Malsam

Date:

2/24/2012

Western Cooperative Electric KCC DR #88

Compan 02	y Processin Year 1	r 2010	Account # Journal 930.1 A/P	Vendor Name KIOGA	Additional Description 2010 KIOGA Membership Dues	Description 2010 MEMBERSHIP KIOGA 16892	Amount 116.66	Lobbying % 0%
						2010 TOUCHSTONE KANSAS ELE 119248	76.34	
02 02	2	2010 2010	908 A/P 909 A/P	Kansas Electric Cooperative Kansas Electric Cooperative	2010 Touchstone KS Dues Assessment 2010 Touchstone KS Dues Assessment	2010 TOUCHSTONE KANSAS ELE 119248	76.34	
02	2	2010	930.1 A/P	Kansas Electric Cooperative	2010 Touchstone KS Dues Assessment	2010 TOUCHSTONE KANSAS ELE 119248	229.02	
02	12	2010	908 A/P	Touchstone Energy	2011 National Touchstone Energy Dues	2011 NATIONAL TO TOUCHSTONE 652421	730.00	
02	12	2010	909 A/P	Touchstone Energy	2011 National Touchstone Energy Dues	2011 NATIONAL TO TOUCHSTONE 652421	730.00	
02	12	2010	930.1 A/P	Touchstone Energy	2011 National Touchstone Energy Dues	2011 NATIONAL TO TOUCHSTONE 652421	2,190.00	
							4,031.70	0%
02	4	2010	908 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	APR SUBS/DUES/C- KANSAS ELE 119577	2,677.76	
02	4	2010	909 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	APR SUBS/DUES/C- KANSAS ELE 119577	248.49	
02	4	2010	930.1 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	APR SUBS/DUES/C- KANSAS ELE 119577	852.80	
02	8	2010	908 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	AUG SUBS/DUES/C- KANSAS ELE 120262	1,993.70	
02	8	2010	909 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	AUG SUBS/DUES/C- KANSAS ELE 120262	185.44	
02	8	2010	930.1 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	AUG SUBS/DUES/C- KANSAS ELE 120262	898.27	
02	12	2010	908 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	DEC SUBS/DUES/C- KANSAS ELE 120998	1,976.11	
02	12	2010	909 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	DEC SUBS/DUES/C- KANSAS ELE 120998	185.44	
02	12	2010	930.1 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	DEC SUBS/DUES/C- KANSAS ELE 120998	898.50	
02	2	2010	908 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	FEB SUBS/DUES/C- KANSAS ELE 119189	2,676.86	
02	2	2010	909 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	FEB SUBS/DUES/C- KANSAS ELE 119189	248.49	
02	2	2010	930.1 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	FEB SUBS/DUES/C- KANSAS ELE 119189	852.80	
02	1	2010	908 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	JAN SUBS/DUES/C- KANSAS ELE 119099	2,675.45	
02	1	2010	909 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	JAN SUBS/DUES/C- KANSAS ELE 119099	248.49	
02	1	2010	930.1 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	JAN SUBS/DUES/C- KANSAS ELE 119099	852.79	
02	7	2010	908 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	JULY SUBS/DUES/C KANSAS ELE 120117	1,993.43	
02	7	2010	909 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	JULY SUBS/DUES/C KANSAS ELE 120117	185.44	
02	7	2010	930.1 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	JULY SUBS/DUES/C KANSAS ELE 120117	898.22	
02	6	2010	908 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	JUNE SUBS/DUES/C KANSAS ELE 119981	2,670.57	
02	6	2010	909 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	JUNE SUBS/DUES/C KANSAS ELE 119981	248.49	
02	6	2010	930.1 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	JUNE SUBS/DUES/C KANSAS ELE 119981	852.86	
02	9	2010	908 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	KEC SUBS/DUES/C- KANSAS ELE 120470	1,992.88 185.44	
02	9	2010	909 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	KEC SUBS/DUES/C- KANSAS ELE 120470	898.27	
02	9	2010	930.1 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	KEC SUBS/DUES/C- KANSAS ELE 120470 KEC SUBS/DUES/C- KANSAS ELE 120695	1,980.20	
02	10	2010	908 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	KEC SUBS/DUES/C- KANSAS ELE 120095	185.44	
02	10	2010	909 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	KEC SUBS/DUES/C- KANSAS ELE 120095	898.56	
02	10	2010	930.1 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	MAR SUBS/DUES/C- KANSAS ELE 120055	2,673.43	
02	3 3	2010	908 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	MAR SUBS/DUES/C- KANSAS ELE 119342 MAR SUBS/DUES/C- KANSAS ELE 119342	248.49	
02		2010	909 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	MAR SUBS/DUES/C- KANSAS ELE 119342 MAR SUBS/DUES/C- KANSAS ELE 119342	852.81	
02	3	2010	930.1 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	MAY SUBS/DUES/C- KANSAS ELE 119342 MAY SUBS/DUES/C- KANSAS ELE 119780	2,681.74	
02	5 5	2010	908 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	MAY SUBS/DUES/C- KANSAS ELE 119780	248.49	
02	5	2010	909 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	MAY SUBS/DUES/C- KANSAS ELE 119780	852.84	
02 02	11	2010 2010	930.1 A/P 908 A/P	Kansas Electric Cooperative Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine Monthly KEC Dues and Subscription fees for monthly magazine	NOV SUBS/DUES/C- KANSAS ELE 120807	2,061.92	
02	11	2010	909 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	NOV SUBS/DUES/C- KANSAS ELE 120807	185.44	
02	11	2010	930.1 A/P	Kansas Electric Cooperative	Monthly KEC Dues and Subscription fees for monthly magazine	NOV SUBS/DUES/C- KANSAS ELE 120807	897.20	
02		2010	550.1 AF	Kalisas Electric Gooperative			41,163.55	19.44%
02	6	2010	930.2 A/P	NRECA	2010 NRECA Membership Dues	2010 MEMBERSHIP DUES	6,843.33	20%
02	5	2010	930.2 A/P	Ellsworth Chamber of Commerce	2010 Chamber Dues	2010 CHAMBER DUE ELLSWORTH/ 2344	200.00	0%
02	5	2010	930.2 A/P	KS REC Accountant's Club	2010 Membership	2010 MEMBERSHIP KANSAS REC 051010	50.00	0%
02	7	2010	930.2 A/P	Kansas Material Managers Club	2010 Membership	2010 MEMBERSHIP KANSAS MAT 072110	25.00	0%

Request No: 97

Company Name	Mid-Kansas Electric Company, LLC and Western Cooperative Electric Association, Inc.				
Docket Number	12-MKEE-491-RTS				
Request Date	February 23, 2012				
Date Information Needed	March 2, 2012				
Please Provide the Following:					

With respect to bad debt expense, please provide the following:

1. Please provide Western's total amount of bad debt expense recorded in the test year. Please see pdf file (KCC DR #97 BAD DEBT EXPENSE.PDF)

2. Please provide Western's total bad debt expense ratio for the following years: 2009, 2010 and 2011. Please see excel file (KCC DR #97 BAD DEBT EXPENSE RATIO.XLSX)

Response:

Please see responses above.

Submitted By Andria Finger

Submitted To Western

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Citizens' Utility Ratepayer Board any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: Stacey Malsam

Date:

2/27/2012

Western Coop Electric KCC DR #97

		Bad Debt	Bad Debt
Year	Sales	Expense	Expense Ratio
2009	12,990,301.20	7,160.35	0.055121%
2010	16,520,731.80	22,800.00	0.138008%
2011	17,054,388.60	16,920.00	0.099212%

02-27-2012 2-2012 14:46:56 Basic : 457

Basic

02 - Western Cooperative Electric - East

Metric ID Metric Reference Company Processing **Budget ID** Description Amount Year Account # Division Departmen Sub-Dept Activity Journal Month Value FIXED ACCRUE BAD 1.900.00 0.0000000000 FJ 8-4 02 - Western JAN 2010 904.000 -- BLANK - BLANK - BLANK - BLANK - BLANK DEBT Cooperative UNCOLLECTIB EXPENSE Electric - East LE ACCOUNTS 0.0000000000 FJ 8-4 02 - Western FEB 2010 904.000 -- BLANK - BLANK - BLANK - BLANK - BLANK FIXED ACCRUE BAD 1,900.00 UNCOLLECTIB DEBT Cooperative EXPENSE Electric - East 1 F ACCOUNTS FIXED ACCRUE BAD 1,900.00 0.0000000000 FJ 8-4 02 - Western MAR 904 000 + - BLANK - BLANK - BLANK - BLANK - BLANK 2010 DEBT UNCOLLECTIB Cooperative EXPENSE Electric - East LE ACCOUNTS FJ 8-4A 02 - Western APR 904.000 -- BLANK FIXED-02 ACCRUE BAD 1,900.00 2010 - BLANK - BLANK - BLANK - BLANK UNCOLLECTIB DEBT Cooperative EXPENSE Electric - East LE **ACCOUNTS** 02 - Western MAY 2010 904 000 -- BLANK - BLANK - BLANK FIXED-02 ACCRUE BAD 1.900.00 FJ 8-4A - BLANK - BLANK DEBT Cooperative UNCOLLECTIB EXPENSE Electric - East LE ACCOUNTS FJ 8-4A 02 - Western JUN 2010 904.000 -- BLANK - BLANK - BLANK - BLANK - BLANK FIXED-02 ACCRUE BAD 1,900.00 UNCOLLECTIB DEBT Cooperative EXPENSE Electric - East ĽÉ ACCOUNTS ACCRUE BAD FJ 8-4A 02 - Western JUL - BLANK - BLANK FIXED-02 1,900.00 2010 904.000 -- BLANK - BLANK - BLANK UNCOLLECTIB DEBT Cooperative EXPENSE Electric - East 1E ACCOUNTS FIXED-02 ACCRUE BAD 1.900.00 FJ 8-4A 02 - Western AUG 2010 904.000 -- BLANK - BLANK - BLANK - BLANK - BLANK UNCOLLECTIB DEBT Cooperative EXPENSE Electric - East LE ACCOUNTS FJ 8-4A 02 - Western SEP 904.000 -BLANK - BLANK - BLANK FIXED-02 ACCRUE BAD 1,900.00 2010 - BLANK - BLANK UNCOLLECTIB DEBT Cooperative EXPENSE Electric - East LE ACCOUNTS 02 - Western OCT 904.000 -ACCRUE BAD 1,900.00 FJ 8-4A 2010 - BLANK - BLANK - BLANK - BLANK - BLANK FIXED-02 UNCOLLECTIB Cooperative DEBT EXPENSE Electric - East LE ACCOUNTS 02 - Western NOV FJ 8-4A 2010 904.000 -- BLANK - BLANK - BLANK - BLANK - BLANK FIXED-02 ACCRUE BAD 1,900.00 UNCOLLECTIB DEBT Cooperative EXPENSE Electric - East LE ACCOUNTS 1.5 ACCRUE BAD FJ 8-4A 02 - Western DEC 904.000 -FIXED-02 1,900.00 2010 - BLANK - BLANK - BLANK - BLANK - BLANK Cooperative UNCOLLECTIB DEBT EXPENSE Electric - East LE ACCOUNTS YEAREND 02 - Western EOY 904.000 -2010 - BLANK - BLANK - BLANK - BLANK - BLANK YEAREND End of Year (22,800.00) Cooperative UNCOLLECTIB **Closing Entry** Electric - East LE ACCOUNTS

PAGE 1

0.00

Company NameMid-Kansas Electric Company, LLC and
Western Cooperative Electric Association, Inc.Docket Number12-MKEE-491-RTSRequest DateMarch 10, 2012Date Information NeededMarch 19, 2012

Please Provide the Following:

Please provide a detailed explanation and a copy of the supporting invoices for the following expenses:

Account	Entry Date	Description	Amount
926.000	01/31/2010	RYAN - CHRISTMAS D GOHEEN RYA 011510	29.01
926.000	02/28/2010	KELLYE I-GIFT CA FIRST NATI 01/10 DAVE	250.00
926.000	05/28/2010	WESTERN LOGO'S W TOADILY AW 120000237	198.65
926.000	07/21/2010	KELLYE O GIFT CE FIRST NATI 07/10 DAVE	250.00
930.400	10/22/2010	ACCOUNTANT'S CLU MALSAM STA 102210	323.13
930.410	05/27/2010	ANNUAL MTG SHIRT JF BEAVER 66917	557.63
930.410	05/17/2010	425 MEALS ANNUAL BIGGE'S CO 051710	2,345.15

Response:

Please see excel file (KCC DR #127 EXPENSES.XLSX) Please see pdf file (KCC DR #127 EXPENSES.PDF)

Submitted By Andria Finger

Submitted To Western

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Citizens' Utility Ratepayer Board any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed:

Stacey Malsam

Request No: 127

Date:

3/9/2012

Western Coop Electric KCC DR #127

A/C	Entry Date Description	Additional Description	Amount	Ck #
		Employee on-call night of employee Christmas party so could not attend so Western for a meal		
926.000	1/31/2010 RYAN - CHRISTMAS D GOHEEN RYA 011510	for him	29.01	39843
		Employees that reach 25 years of service and greater get a gift certificate to a place of their	· ·	
926.000	2/28/2010 KELLYE I-GIFT CA FIRST NATI 01/10 DAVE	choosing at each 5 year increment (\$10 per year of service)	250.00	39969
		Western pays for the Western logo to be printed on short sleeve t-shirts for summer.		
926.000	5/28/2010 WESTERN LOGO'S W TOADILY AW 120000237	Employees pay for the actual t-shirt themselves - charged to personal accounts.	198.65	40863
		Employees that reach 25 years of service and greater get a gift certificate to a place of their		
926.000	7/21/2010 KELLYE O GIFT CE FIRST NATI 07/10 DAVE	choosing at each 5 year increment (\$10 per year of service)	250.00	41214
		Travel, meals and door prize for 2 employees to attend the REC Accountant's club meeting in		
930.400	10/22/2010 ACCOUNTANT'S CLU MALSAM STA 102210	Manhattan, KS	323.13	41728
		Shirts ordered by Western for employees and board members to wear at the Western Annual		
930.410	5/27/2010 ANNUAL MTG SHIRT JF BEAVER 66917	Meeting so members can easily identify Western representatives	557.63	40753
930.410	5/17/2010 425 MEALS ANNUAL BIGGE'S CO 051710	Meal provided for Western's member annual meeting	2,345.15	40657

Company NameMid-Kansas Electric Company, LLC and
Western Cooperative Electric Association, Inc.Docket Number12-MKEE-491-RTSRequest DateApril 12, 2012Date Information NeededApril 20, 2012

Please Provide the Following:

In regards to Rate Case expense, please provide the following:

a. Please provide a spreadsheet detailing all rate case expenses charged to date including FERC account number(s), dates, and a detailed description of each expense. Please specify whether the costs are related to Docket No. 12-MKEE-491-RTS.

b. Please provide invoices and all supporting documents for each of the expenses included in the above mentioned spreadsheet.

Response:

Please see attached excel file (KCC DR# 145 RATE CASE EXPENSE.XLSX) Please see attached pdf file (KCC DR #145 RATE CASE EXPENSE.PDF)

Submitted By Andria Finger

Submitted To Western

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Citizens' Utility Ratepayer Board any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed:

Stacey Malsam

Date:

4/13/2012

Request No: 145

Western Coop Electric KCC DR #145

Western Consultant Expenses

	·			GL Accoun	t
Ck Date	Vendor	Ck No	Amount	#	Description
7/20/2011	Power System Engineering Inc.	43510	2,755.00	92	3 COS Study /Rate Consultant Fees
8/24/2011 F	Power System Engineering Inc.	43767	12,050.48	92	3 COS Study /Rate Consultant Fees
9/26/2011 F	Power System Engineering Inc.	43976	8,604.50	92	3 COS Study /Rate Consultant Fees
10/25/2011 F	Power System Engineering Inc.	44185	9,195.50	92	3 COS Study /Rate Consultant Fees
11/23/2011 F	Power System Engineering Inc.	44350	8,082.50	92	3 COS Study /Rate Consultant Fees
12/29/2011 F	Power System Engineering Inc.	44583	6,900.00	92	3 COS Study /Rate Consultant Fees
1/25/2012 F	Power System Engineering Inc.	44747	6,892.50	92	3 COS Study /Rate Consultant Fees
2/29/2012 F	Power System Engineering Inc.	44952	2,290.75	92	3 COS Study /Rate Consultant Fees
4/5/2012 F	Power System Engineering Inc.	45191	1,418.50	92	3 COS Study /Rate Consultant Fees
			\$ 58,189.73		

MKEC Expense

Invoice		G	L Accou	nt
Date	Vendor	Amount	#	Description
2/25/2012 Hed	lberg & Foster Reporting, Inc.	157.50	9	23 Prehearing Conference Transcript
Wat	tkins Calcara	1,920.00	9	23 Legal Fees (No invoice attached confidential / privileged)
		\$ 2.077.50		

Western Staff Expense

					Wage	
Date	Employee #	Hours		Hourly Rate	Expense	GL Account #
6/22/2011	150		6	38.26	229.56	920
6/24/2011	150		6	38.26	229.56	920
8/3/2011	150		6	38.26	229.56	920
8/4/2011	150		7	38.26	267.82	920
8/5/2011	150		6	38.26	229.56	920
8/8/2011	150		3	38.26	114.78	920
8/9/2011	150		3	38.26	114.78	920
8/10/2011	150		6	38.26	229.56	920

9/15/2011	150	6	38.26	229.56	920
11/29/2011	150	6.5	41.20	267.80	920
11/30/2011	150	6	41.20	247.20	920
12/1/2011	150	6	41.20	247.20	920
12/6/2011	150	6	41.20	247.20	920
12/12/2011	150	7.5	41.20	309.00	920
2/15/2012	150	4	41.20	164.80	920
2/17/2012	150	2	41.20	82.40	920
2/20/2012	150	7	41.20	288.40	920
2/23/2012	150	8	41.20	329.60	920
2/27/2012	150	8	41.20	329.60	920
2/28/2012	150	6	41.20	247.20	920
3/1/2012	150	7	41.20	288.40	920
3/2/2012	150	2.75	41.20	113.30	· 920
3/7/2012	150	6	41.20	247.20	920
3/8/2012	150	5	41.20	206.00	920
3/14/2012	150	4	41.20	164.80	920
3/15/2012	150	8	41.20	329.60	920
3/26/2012	150	4	41.20	164.80	920
3/27/2012	150	. 8	41.20	329.60	920
3/28/2012	150	5	41.20	206.00	920
3/29/2012	150	1	41.20	41.20	920
		166.75		\$ 6,726.04	

TOTAL EXPENSES REPORTED

\$ 66,993.27

Request No: 151

Company Name	Western Cooperative Electric Association, Inc.				
Docket Number	12-MKEE-491-RTS				
Request Date	April 18, 2012				
Date Information Needed	April 26, 2012				

Please Provide the Following:

Please specify whether each expense listed in response to Staff Data Request No. 90 is a recurring or non-recurring expenditure. If the expense is non-recurring, please provide a detailed explanation as to why it is non-recurring.

Response:

Please see excel file (KCC DR #151 OUTSIDE SERVICES FOLLOW UP TO DR #90.XLS)

Submitted By Andria Finger

Submitted To Western

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Citizens' Utility Ratepayer Board any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed:

Stacey Malsam

Date:

04/23/2012

Western Cooperative Electric KCC DR #151

Compa	ny Processin Yea	ir /	Account # Journal	Description	Amount	Classification	Recurring / Non-Recurring	Reason Non-rucurring
02	1	2010	923 A/P	PROGRESS BILLING DREYER & K 011810	333.33	Accounting	Recurring	
02	3	2010	923 A/P	PROGRESS BILLING DREYER & K 030910	2,933.33	Accounting	Recurring	
02	4	2010	923 A/P	FINAL BILL 12/31 DREYER & K 040910	2,033.33	Accounting	Recurring	
02	5	2010	923 A/P	AUDIT PRESENTATI DREYER & K 051210	290.00	Accounting	Recurring	
02	12	2010	923 A/P	PROGRESS BILLING DREYER & K 122010	1,534.75	Accounting	Recurring	
02	1	2010	923 A/P	JANUARY RETAINER DEINES & D 010110	400.00	Legal	Recuming	
02	2	2010	923 A/P	AUDIT LETTER DEINES & D 11980	100.00	Legal	Recurring	
02	2	2010	923 A/P	FEBRUARY RETAINE DEINES & D 020110	400.00	Legal	Recurring	
02	2	2010	923 A/P	PC SMALL ESTATE DEINES & D 11980	30.00	Legal	Non-Recurring	One-time Patronage Capital guestion on a specific estate
02 .	3	2010	923 A/P	MARCH RETAINER DEINES & D 030110	400.00	Legal	Recurring	9
02	4	2010	923 A/P	APRIL RETAINER DEINES & D 040110	400.00	Legal	Recurring	
02	4	2010	923 A/P	MKEC LOAN GUARAN DEINES & D 12092	45.00	Legal	Non-Recurring	One-time loan guarantee notices required
02	4	2010	923 A/P	NCSC LOAN GUARAN DEINES & D 12092	225.00	Legal	Non-Recurring	One-time loan guarantee notices required
02	5	2010	923 A/P	MAY RETAINER DEINES & D 050110	400.00	Legal	Recurring	3
02	. 6	2010	923 A/P	JUNE RETAINER DEINES & D 060110	400.00	Legal	Recurring	
02	6	2010	923 A/P	WEBCAST ANNUAL M DEINES & D 12190	130.00	Legal	Recurring	
02	. 7	2010	923 A/P	JULY RETAINER DEINES & D 070110	300.00	Legal	Recurring	
02	7	2010	923 A/P	PROPERTY TO JAY DEINES & D 12233	315.00	Legat	Non-Recurring	One-time sale of small piece of land
02	8	2010	923 A/P	AUGUST RETAINER DEINES & D 080110	300.00	Legal	Recurring	·····
02	9	2010	923 A/P	SEPTEMBER RETAIN DEINES & D 090110	300.00	Legal	Recurring	
02	9	2010	923 A/P	STRATEGIC PLANNI DEINES & D 12336	300.00	Legal	Recurring	
02	9	2010	923 A/P	STRATEGIC PLANNI DEINES & D 12336	18.75	Legal	Recurring	
02	10	2010	923 A/P	OCTOBER RETAINER DEINES & D 100110	300.00	Legat	Recurring	
02	11	2010	923 A/P	NOVEMBER RETAINE DEINES & D 110110	300.00	Legal	Recurring	
02	12	2010	923 A/P	COBANK REFI DEINES & D 12503	97.50	Legal	Non-Recurring	One-time loan guarantee notices required
02	12	2010	923 A/P	DECEMBER RETAINE DEINES & D 120110	300.00	Legal	Recurring	-
02	1	2010	923 A/P	MKC RATE STUDY POWER SYST 90002268	2,078.50	Rate Consultant	Will be reucurring but may not be on annual basis	
02	2	2010	923 A/P	MKEC RATE STUDY POWER SYST 9002419	822.50	Rate Consultant	Will be reucurring but may not be on annual basis	
02	3	2010	923 A/P	MKEC RATE STUDY POWER SYST 9002519	100.00	Rate Consultant	Will be reucuring but may not be on annual basis	
02	9	2010	923 A/P	WESTERN STRATEGI RAMADA HAY 083110	14.05	Strategic Planning	Recurring	
					15,601.04			

CERTIFICATE OF SERVICE

12-MKEE-491-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic mail this 14th day of May, 2012, to the following:

RAY BERGMEIER, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD ROAD TOPEKA, KS 66604-4027

HOLLY FISHER, ATTORNEY KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD ROAD TOPEKA, KS 66604-4027

MARK D. CALCARA, ATTORNEY WATKINS CALCARA CHTD. 1321 MAIN STREET SUITE 300 PO DRAWER 1110 GREAT BEND, KS 67530

LINDSAY A. SHEPARD, ATTORNEY WATKINS CALCARA CHTD. 1321 MAIN STREET SUITE 300 PO DRAWER 1110 GREAT BEND, KS 67530

DAVID L. SCHNEIDER, MANAGER WESTERN COOPERATIVE ELECTRIC ASSN., INC. 635 S 13TH STREET PO BOX 278 WAKEENEY, KS 67672-0278

STACEY MALSAM, MANAGER OF ACCOUNTING & FINANCE WESTERN COOPERATIVE ELECTRIC ASSN., INC. 635 S 13TH STREET PO BOX 278 WAKEENEY, KS 67672-0278

DON GULLEY, SR MANAGER REGULATORY RELATIONS AND BILLING MID-KANSAS ELECTRIC COMPANY, LLC 301 WEST 13TH STREET PO BOX 980 HAYS, KS 67601

MARK DOLJAC, DIR RATES AND REGULATION KANSAS ELECTRIC POWER CO-OP, INC. 600 SW CORPORATE VIEW (66615) PO BOX 4877 TOPEKA, KS 66604-0877 J. MICHAEL PETERS, GENERAL COUNSEL KANSAS ELECTRIC POWER CO-OP, INC. 600 SW CORPORATE VIEW (66615) PO BOX 4877 TOPEKA, KS 66604-0877

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Della Smith Administrative Specialist