

BEFORE THE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Great Plains)
Energy Incorporated, Kansas City Power &)
Light Company and Westar Energy, Inc. for) KCC Docket No. 18-KCPE-095-MER
Approval of the Merger of Westar Energy, Inc.)
and Great Plains Energy Incorporated.)

DIRECT TESTIMONY OF

CARY CATCHPOLE

ON BEHALF OF

THE CITIZENS' UTILITY RATEPAYER BOARD

January 29, 2018

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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Cary Catchpole, and my business address is 1500 SW Arrowhead Road,
4 Topeka, Kansas, 66604.

5

6 **Q. What is your occupation?**

7 A. I am an economist and accountant in the field of public utility regulation.

8

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

10 A. I am employed by the Citizens' Utility Ratepayer Board ("CURB") as a Regulatory
11 Analyst.

12

13 **Q. Please describe your educational background.**

14 A. I graduated from Washburn University in Topeka, Kansas, in 2001 with a Bachelor of
15 Business Administration *magna cum laude*, which included an emphasis in Finance. I
16 recently earned a Master's Certificate in Public Utility Regulation & Economics from New
17 Mexico State University in May 2017.

18

19 **Q. Please summarize your professional experience.**

20 A. I joined the CURB as a Regulatory Analyst in May of 2016. Prior to joining CURB, I
21 worked as an economic developer with the Kansas Department of Commerce for 15 years
22 in numerous capacities, including research analysis, business development representation,
23 assistant management of workforce training and education, and incentive program

1 management.

2

3 **Q. Have you previously testified before the Commission?**

4 A. Yes, I have previously offered testimony before the Commission in KCC Docket Nos.
5 16-SPEE-497-RTS, 16-GIME-403-GIE and 17-SPEE-476-TAR.

6

7 **Q. Was this testimony and related exhibits prepared by you or under your supervision?**

8 A. Yes.

9

10 **Q. What is the overall context of this case?**

11 A. Westar Energy, Inc. and Kansas Gas and Electric Company (“Westar”), Great Plains
12 Energy Incorporated (“Great Plains Energy”), and Kansas City Power & Light Company
13 (“KCP&L”) (all parties are collectively referred to as “Joint Applicants”) filed an
14 Application on August 26, 2017, seeking approval from the Kansas Corporation
15 Commission (“KCC” or “Commission”) for a merger between Westar and Great Plains
16 Energy, the parent company of KCP&L. Westar and KCP&L are the two largest suppliers
17 of electricity service in Kansas, serving approximately 1,000,000 Kansas customers
18 between the two utilities.¹ KCP&L also provides electricity to a number of customers in
19 Missouri. The new application in Docket No. 18-KCPE-095-MER (“095 Docket”) is
20 described by Westar and Great Plains Energy as a merger of equals; however, Westar
21 currently serves twice the number of Kansas customers as GPE.

¹ Application, Docket No. 18-KCPE-095-MER, August 25, 2017, p. 8, ¶ 17.

1 This application follows an earlier application for the acquisition of Westar by
2 Great Plains Energy filed in June of 2016 in Docket No. 16-KCPE-593-ACQ (“16-593
3 Docket”). The acquisition application was denied by the Commission on April 19, 2017,
4 when the Commission determined the transaction was not in the public interest. The
5 Commission expressed a number of concerns regarding the proposed transaction which
6 included, among other things, a lack of immediate guaranteed customer benefits.

7
8 **II. PURPOSE AND SUMMARY**

9 **Q. What is the purpose of your direct testimony?**

10 A. I am testifying on behalf of CURB regarding utility quality of service standards, and the
11 necessity of assuring quality of service in the proposed merger between Westar and GPE.
12 Being without electricity is not just a major inconvenience, it is potentially life threatening.
13 A lack of quality in electric service delivery can directly impact consumer health, safety
14 and welfare. Quality of service in the utility industry is comprised of two essential parts –
15 service reliability and customer communication quality, both of which are important to
16 consumers. This is exemplified in customer satisfaction surveys conducted by J.D. Power
17 in recent years that show residential electric customers highly value proactive
18 communication, especially during power outages.² The purpose of my testimony is to
19 review the merger application submitted by GPE and Westar, and address the following
20 quality of service considerations:

- 21 1. Measuring distribution reliability and customer service metrics for performance;

²J.D. Power 2017 Electric Utility Residential Customer Satisfaction Study (SM); J.D. Power 2016 Electric Utility Residential Customer Satisfaction Study(SM); J.D. Power 2015 Electric Utility Residential Customer Satisfaction Study(SM), www.jdpower.com.

1 2. The Joint Applicants’ proposal to guarantee service quality through penalties for
2 degraded service;

3 3. The need for continuous improvement in service quality that will place the Joint
4 Applicants in line with increasing customer expectations post-merger; and

5 4. Any impact the proposed merger transaction will have on public safety.

6 My testimony will supplement the overall recommendations of Andrea Crane and Stacey
7 Harden for CURB regarding the merger application.

8
9 **Q. Please summarize your recommendations on these subjects.**

10 A. KCP&L and Westar share a culture of “providing sufficient and efficient service in
11 Kansas” as noted by the Commission in the 16-593 Docket Order³ and by the Joint
12 Applicants in their Prospectus.⁴ The Joint Applicants have recognized the importance of
13 quality of service in their application by including provisions that would penalize KCP&L
14 and Westar for less than adequate service. However, I believe their plan requires
15 modification to truly provide assurance. My recommendations for the Commission
16 regarding the quality of service components under consideration are as follows:

- 17 • Adjustments to the Joint Applicants’ proposed penalty structure should include the
18 addition of two standard metrics (the CAIDI and the ACR), establishing individual
19 benchmarks per company (Westar North, Westar South, and KCP&L) based on
20 each company’s three-year service averages, and determining penalties (customer
21 refunds) based on the variation of each company’s measurement from the

³ Order, Docket No. 16-KCPE-593-ACQ, April 19, 2017, ¶ 5.

⁴ Westar and GPE’s Joint Proxy Statement/Prospectus, p. 80.

1 established benchmarks. In order to effectively measure quality, the Joint
2 Applicants should widen the scope of their reporting and calculate customer refunds
3 in a manner similar to prior merger agreements.

- 4 • Refunds to customers for declines in quality of service by the Joint Applicants
5 should be extended indefinitely, and
- 6 • The Joint Applicants should offer customers a guarantee for higher service quality
7 by agreeing to raise reliability and customer service baseline averages post-Merger
8 by 5% per metric over the next five (5) years, and establish refunds for unimproved
9 metrics. By guaranteeing continuous improvement, the Joint Applicants will
10 enhance the combined company's ability to demonstrate value as well as show that
11 the merger has promoted the public interest.

12
13 **III. DISCUSSION OF THE ISSUES**

14 **A. Reliability**

15 **Q. What is meant by utility service reliability?**

16 A. Reliability is typically evaluated from the customer's perspective, and utility service
17 reliability is electric service delivery free of unplanned interruption or outages. Service
18 reliability is synonymous with distribution reliability because distribution is the last stage
19 of utility operations that occur prior to final customer delivery. Although the customer
20 receives electricity from a complex network, the degree of reliability of distribution
21 delivery that occurs in the low-voltage delivery area geographically close to the customer's
22 home or business must be within accepted standards and in the amount desired.

23

1 **Q. Can distribution reliability be measured?**

2 A. Yes, distribution reliability has been measured by the industry for many years with three
3 important system performance indices: System Average Interruption Frequency Index
4 (SAIFI), System Average Interruption Duration Index (SAIDI) and Customer Average
5 Interruption Duration Index (CAIDI). These standard indices developed by the Institute
6 of Electrical and Electronics Engineers (IEEE) track the frequency and duration of
7 sustained electric outages.

8

9 **Q. Are these indices used in Kansas?**

10 A. Yes, the KCC adopted electric reliability requirements in Docket No. 02-GIME-365-GIE
11 (“02-365 Docket”). Utilities that serve more than 15,000 Kansas customers are required
12 annually to file a report containing SAIFI, SAIDI and CAIDI normalized measurements
13 for the prior five years, along with other items related to service obligations, record
14 keeping, notification and reporting. The only reliability indices considered in Kansas are
15 the SAIFI, CAIDI, and SAIDI, and only normalized reliability data is reported, which is
16 all actual reliability data except for sustained interruptions that occur during major
17 catastrophic events.⁵ In Kansas to be considered “sustained,” an outage must be longer
18 than five minutes.⁶

19

⁵ Order, Docket No. 02-GIME-365-GIE, October 4, 2010, Attachment A, pg. 2, item (n).

⁶ Order, Docket No. 02-GIME-365-GIE, October 4, 2010, Attachment A, pg. 3, item (t).

1 **Q. Please explain how the indices function.**

2 A. Utilities count the number of customers interrupted by each outage over the year, as well
3 as record outage duration times. They also make note of which service interruptions are
4 not due to catastrophic events (such as storms, extensive wind, and etc.), and conduct
5 calculations on resulting data. The reliability indices are ratios that use this data and are
6 defined as such:

- 7 • SAIFI (System Average Interruption Frequency Index) is the sum of customer
8 interruptions (outages) divided the total number of customers served over a specified
9 time period. SAIFI represents the average number of sustained interruptions, or how
10 often a customer can expect to experience an outage.
- 11 • SAIDI (System Average Interruption Duration Index) is the sum of customer
12 minutes of interruption divided by the sum of customers interrupted. SAIDI
13 determines in minutes what the average outage duration time is per customer.
- 14 • CAIDI (Customer Average Interruption Duration Index) is the sum of all customer
15 interruptions durations in minutes divided by the total number of customers
16 interrupted. CAIDI is the weighted average length of a customer's interruption, and
17 represents the average restoration time of service to the customer.

18
19 **Q. What data has been reported by Westar and KCP&L?**

20 A. Please see the following chart that includes normalized reliability statistics recorded by
21 Westar North, Westar South and KCP&L over the last five years:⁷

⁷ Source documents: (KCP&L Data) May 2, 2017, Docket No. 02-GIME-365-GIE, Kansas City Power & Light Company's 2016 Reliability Performance Report, at page 3; KCC Staff DR #31. (Westar North & South Data)

1

Measure	Company	2012	2013	2014	2015	2016
SAIFI (#)	KCP&L (Kansas)	0.64	0.76	0.86	0.89	0.87
	Westar North	1.46	1.47	1.66	1.75	1.44
	Westar South	1.23	1.45	1.24	1.41	1.37
SAIDI (minutes)	KCP&L (Kansas)	72.80	109.30	113.06	138.69	117.28
	Westar North	140.13	139.15	169.97	236.33	147.02
	Westar South	163.99	186.47	112.82	146.19	161.59
CAIDI (minutes)	KCP&L (Kansas)	113.70	143.70	131.87	156.29	134.47
	Westar North	95.00	94.30	104.80	135.20	103.40
	Westar South	133.80	128.80	90.70	103.80	117.80

2

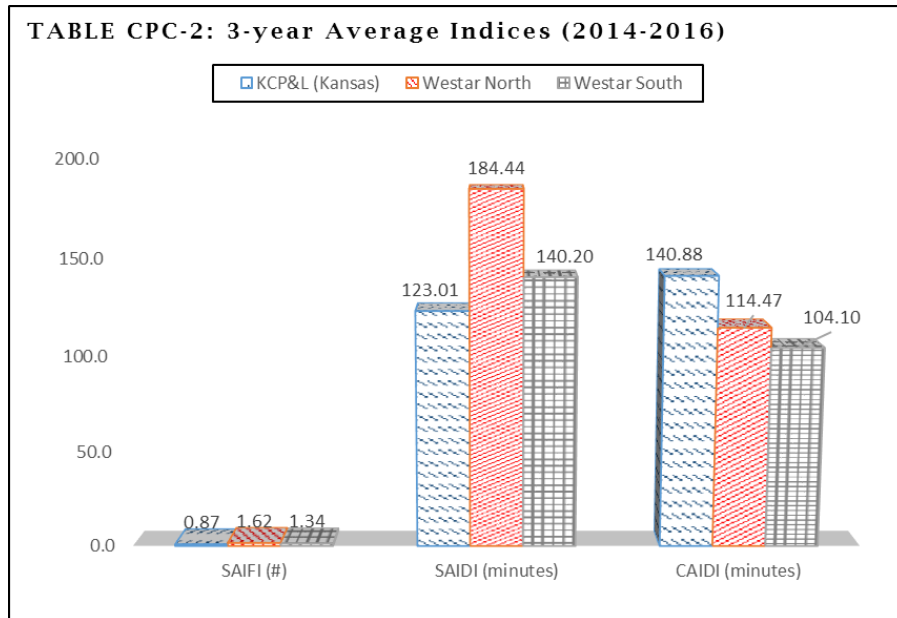
3 **Q. How do Westar and KCP&L compare in terms of reliability?**

4 A. Lower values are preferred when evaluating these indices since they represent fewer
5 outages experienced and less minutes of outage endured by the customer. Essentially,
6 Westar North and Westar South have more outage events with longer frequencies of
7 duration than KCP&L, but a faster service restoration time as indicated by the CAIDI
8 index. According to company testimony, this is due to the fact that Westar services a more
9 rural territory, and KCP&L's territory is more urban.⁸ For a comparison illustration
10 utilizing a three-year average of the indices, see Table CPC-2 below:

April 25, 2017, Docket No. 02-GIME-365-GIE, Annual Reliability Performance Reports for Westar Energy, Inc. and Kansas Gas and Electric Company, at pages 9 (Westar North) and 17 (Westar South); KCC Staff DR #30.

⁸ Akin Direct Testimony, p. 9.

1



2

3 **Q. Why did you choose a three-year average as the benchmark for this comparison?**

4 A. Utilizing a three-year average of the utilities' previous customer service reliability statistics
5 as the benchmark or baseline is appropriate and consistent with docket 16-EPDE-410-ACQ
6 ("16-410 Docket"), the Commission's most recent order on a merged transaction.

7

8 **B. Customer Service Operations**

9 **Q. Please briefly describe what is meant by Customer Operations Quality of Service?**

10 A. Customer communications are vital to utility companies because of the importance of the
11 feedback the company can receive about their service from the customer. Significant
12 information about events such as outages, emergency conditions, and lack of service can
13 be exchanged between the utility and the customer to also help reliability. The quality of
14 the utility's customer care is equally important to the customer. Customer operations
15 quality of service pertains primarily to customer service that occurs at the company's call

1 center(s). Call center functions directly impact the customer, and standard call center
2 industry statistics such as average call rate, service level/response time, contact quality,
3 and customer satisfaction can be evaluated to help secure quality for the customer and
4 improve a call center's performance. In addition, customer surveys can be administered
5 after the call has ended, giving the utility more information about the representative and
6 the call answering process.

7
8 **Q. Please provide more information about standard call center industry metrics.**

9 A. Call centers use a variety of standard metrics identified by acronyms to measure quality
10 and improve the customer experience. Some common metrics include the following:

- 11 1) The ACR, or Answer Call Rate is defined as the number of calls answered by an
12 agent (representative) divided by the number of calls received, and is a ratio
13 expressed as a percentage.
- 14 2) The ASA, or Average Speed of Answer is the average amount of time it takes for
15 calls to be answered by an agent, and is generally measured in seconds.
- 16 3) The SL, or Service Level measures the percentage of incoming calls that an agent
17 answers live in a pre-specified amount of time. The SL can also be referred to as
18 Average Service Level, or ASL.
- 19 4) The AR, or Abandon Rate, is a percentage that describes the number of inbound
20 calls that are abandoned by the customer before speaking to an agent, and is
21 calculated by dividing the abandoned calls by total inbound calls.

22

1 **Q. How many call centers do Westar and KCP&L operate?**

2 A. Westar operates a call center in Wichita, Kansas, that employs 117 employees. The
3 Wichita call center was established in 2008.⁹ KCP&L operates two call centers in
4 Missouri, one in Raytown with 103 employees, and one in Kansas City, MO with 20
5 employees.¹⁰ The KCP&L locations serve customers in both states, and were established
6 in 2008 and 2009 respectively.¹¹

7

8 **Q. Are there any established standard customer service metrics for Kansas utilities?**

9 A. No, there is no standard reporting required by the KCC for customer service metrics, but it
10 appears that KCP&L and Westar collect many of the standard statistics at their respective
11 call centers. Please note the following customer service metrics KCP&L and Westar have
12 provided (see Table CPC-3):¹²

13

⁹ Westar responses to CURB DR 62 and CURB DR 89.

¹⁰ KCP&L response to CURB DR 62.

¹¹ KCP&L response to CURB DR 90.

¹²Source documents: (KCP&L Data) CURB DR 63, CURB DR 63S, CURB DR 92. (Westar Data) CURB DR 63, CURB DR 92. The ACR and the AR have been calculated using the data provided.

1

Measure	Company	2013	2014	2015	2016
Total Calls Answered	KCP&L (all centers)	1,675,034	1,631,922	1,556,213	1,558,247
	Westar	1,138,436	1,050,990	1,104,574	1,118,554
Total Calls Received	KCP&L (all centers)	3,670,809	3,587,282	3,590,234	3,557,200
	Westar	3,129,658	3,253,806	3,038,734	3,034,148
Total Calls Abandoned	KCP&L (all centers)	71,699	58,418	52,675	67,778
	Westar	35,895	28,422	121,263	44,769
ASA (Average Speed of Answer in seconds)	KCP&L (all centers)	45	37	31	43
	Westar	46	93	27	31
ACR (Answer Call Rate)	KCP&L (all centers)	46%	45%	43%	44%
	Westar	36%	32%	36%	37%
AR (Abandon Rate)	KCP&L (all centers)	2%	2%	1%	2%
	Westar	1%	1%	4%	1%

2

3 **Q. How does customer service compare between the Joint Applicants?**

4 A. Over six and a half million customers call KCP&L and Westar annually with their
5 questions and concerns. KCP&L receives 18% more calls annually than Westar, and has
6 a 7 % higher answer call rate. The companies are comparable in their average speed to
7 answer calls, and less than 4% of each company’s customers abandon calls. Interestingly,
8 the companies have used different standards to measure agent service level (ASL) over the
9 years; thus ASL data for each company has not been included for comparison in the table.
10 KCP&L has historically valued a 20-second service level, while Westar has maintained a
11 30-second service level. However, data reported for 2015 indicates that both call centers
12 appear to be performing similarly with roughly a 77% ASL of 20 seconds.¹³

¹³ Harden Direct Testimony, Docket No. 16-KCPE-593-ACQ, December 16, 2016, p. 7.

1 **Q. Is there any additional data regarding the customer service of KCP&L and Westar?**

2 A. Both KCP&L and Westar conduct call center customer satisfaction surveys to learn more
3 about the quality of service they are providing. The KCP&L survey is more comprehensive
4 with over seventeen questions measuring eight metrics, while the Westar survey contains
5 seven questions measuring five metrics. When asked to respond about the overall quality
6 of their customer service experience in 2017, the companies are similarly rated by
7 customers with an 87% customer satisfaction rating at Westar, and an 89% customer
8 satisfaction rating at KCP&L.¹⁴

9

10 **C. Quality of Service Guarantees**

11 **Q. Do the Joint Applicants propose any quality of service guarantees?**

12 A. Yes, they do. The Joint Applicants present their service offers in Commitment No. 33,
13 which is explained by Bruce Akin, Senior Vice President of Power Delivery for Westar.
14 As described in his direct testimony, the Joint Applicants propose that Westar and KCP&L
15 be subject to penalties on a limited set of four metrics if they are unable to meet certain
16 base thresholds proposed for these metrics. These selected metrics include the SAIDI, the
17 SAIFI, the ASL and the AR.¹⁵ The Joint Applicants suggest basing adjustments to the
18 reliability thresholds on Westar's past performance, and applying KCP&L's service
19 expectations to customer call center metrics on which the utilities will report. The proposal
20 removes the penalties after three years if the utilities can demonstrate consecutive years of
21 successfully meeting these performance thresholds.¹⁶ According to Mr. Akin,

¹⁴ KCP&L responses to CURB DR 93 and Westar responses to CURB DR 94.

¹⁵ The Joint Applicants refer to the AR as the "agent abandoned call rate (ACR)." This terminology is differentiated from the Answer Call Rate (ACR) as defined by the Commission in the 16-410 Order.

¹⁶ Akin Direct Testimony, pp. 4-10.

1 Commitment No. 33 is developed upon the Joint Applicant's analysis of Commission
2 precedence from three prior merger dockets indicating a desire to prevent the deterioration
3 of existing service quality, but not improving it.¹⁷
4

5 **Q. Do you have any concerns about the Provisions offered in Commitment No. 33?**

6 A. The Joint Applicants' proposals in Commitment No. 33 are a useful starting point, but I
7 am concerned they are too limited to offer meaningful long-term protection for ratepayers.
8 Ratepayers bear the risk that the combined companies may not follow through on their
9 quality commitments due to a number of events, and this risk is likely to persist for many
10 years following the merger transaction. CURB expert witness Ms. Crane discusses many
11 of these potential events on pages 30-31 of her testimony, which include the possibility of
12 higher costs, unforeseen labor dislocations from Kansas communities, and limited
13 management focus due to preoccupation with post-Merger transition issues. Limiting a
14 review of the number of service quality factors to consider at each utility, as well as the
15 computation of penalties to the lowest benchmark would lead to incomplete assessment
16 and ratepayer hardship. I recommend that adjustments to service Commitment No. 33 be
17 adopted to provide full assurance for the long term.
18

19 **Q. Please describe your recommendations for adjustments to Commitment No. 33.**

20 A. I advocate that the Joint Applicants' commitment be modified by fine-tuning the penalty
21 structure, adopting an indefinite refund period, and adding a guarantee for improved
22 performance through a refund. The primary differences in this enhanced plan include the

¹⁷ Akin Direct Testimony, p. 5.

1 addition of the CAIDI and ACR metrics to those suggested by the company. Benchmarks
2 (thresholds) should be established for each company (Westar North, Westar South, and
3 KCP&L). Refunds to customers would be better assessed on a progressive percentage
4 scale for declines in quality of service metrics calculated individually per utility. Extending
5 the refund requirements indefinitely adds certainty for long-term quality, and a requirement
6 for improvement in each company's performance adds additional strength to ratepayer
7 protection well into the future and beyond the merger transition phase. Please see Schedule
8 CPC-2 that details benchmark baselines, trigger points, potential refunds for each level of
9 service degradation, and a refund for unimproved metrics.

10
11 **Q. How would the refunds be returned to customers?**

12 A. Although not expressly described, the refunds due to customers for any year that the
13 reliability or customer service metrics of the companies decrease below established
14 benchmarks should be dispersed in a manner similar to processes determined by the KCC
15 in the 16-410 Docket. A refund for unimproved metrics could be distributed similarly,
16 with assessment determined at the end of 2023. I would anticipate that the refunds could
17 be distributed on a per customer basis; however, the process should be established and
18 developed at the direction of the Commission.

19
20 **Q. Why are the CAIDI and ACR metrics important?**

21 A. As previously discussed, the CAIDI is a reliability measurement that represents the
22 weighted average length of an interruption for customers affected during a specified period.
23 CAIDI is driven by both the SAIFI and the SAIDI variables, and is one of the measures

1 commonly used to report reliability. Utility company initiatives that can improve CAIDI
2 include a number of actions such as increasing troubleshooter staffing hours of coverage,
3 and promoting an attitude of “restore before repair.”¹⁸

4 ACR is a customer service metric that measures the answered call rate at a call
5 center. Requiring the CAIDI and the ACR in quality of service provisions is consistent
6 with the agreement adopted in the 16-410 Docket, the Commission’s most recent merger
7 docket.

8
9 **Q. Please explain why each company should have its own benchmark established.**

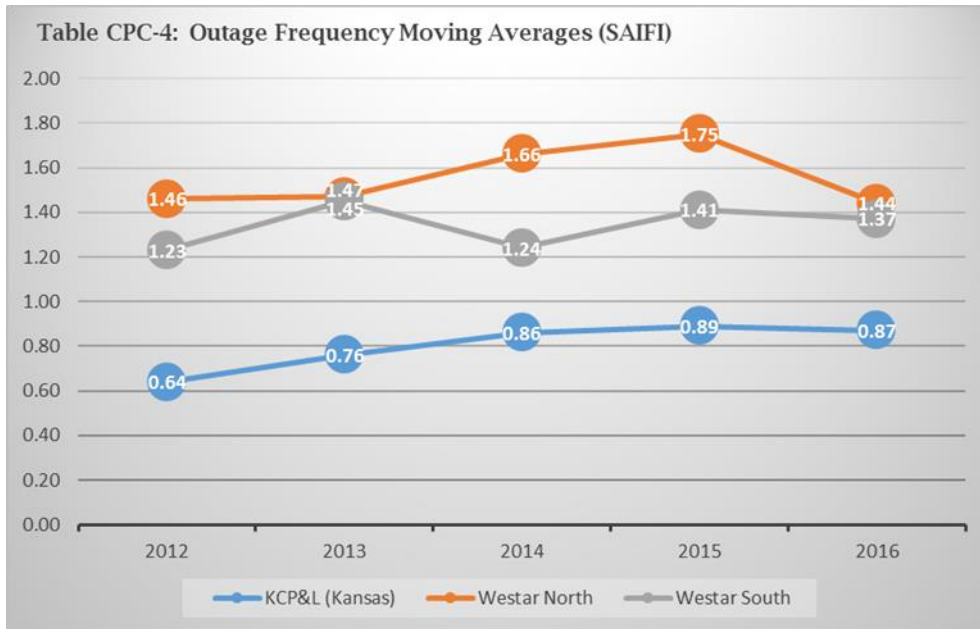
10 A. Customers of a utility that are currently experiencing a level of service should not have to
11 suffer reduced quality because of standards based on lower expectations elsewhere. This
12 is reinforced in the Commission’s statement that a merger should not disadvantage one set
13 of customers over another.¹⁹ As noted earlier, there is disparity between each company’s
14 performance in their reliability metrics. For example, please note the following table that
15 depicts normalized SAIFI, or number of outages measured for each utility company over
16 the last five years:

17

¹⁸ Jennifer Rothwell, The Reliability Triangle. *TD World*, Nov. 1, 2004. www.tdworld.com/smart-energy-consumer/reliability-triangle.

¹⁹ Order Approving Merger, 91-KCPL-140-SEC, November 14, 1991, p. 100.

1



2

3 In this example, the number of service interruptions has varied dramatically over the past
4 five years for each utility with only one near convergence between Westar North and
5 Westar South in 2013. To relax KCP&L's SAIFI outage standards by utilizing another
6 company's metrics (such as Westar North for example) could cause a hardship to KCP&L
7 customers by requiring them to experience more outages. Each service territory should be
8 recognized for its own unique challenges and conditions, and should have its own
9 benchmarks established upon which the refunds are calculated.

10

11 **Q. Why should refunds for reduced service be established indefinitely for KCP&L and**
12 **Westar?**

13 A. Unfortunately, deterioration in service quality can have a substantial visibility lag. The
14 Joint Applicant's proposal to terminate reporting and penalties after three years is too short
15 to provide realistic measurement of the combined company's performance post-Merger.

1 The penalties, or customer refunds, act as an incentive, as well as provide important data
2 to the KCC to consider when evaluating the newly combined company in its required
3 duties. Future quality guarantees of an indefinite period protect ratepayers from
4 deterioration in service, and adds assurance moving forward. If the Commission
5 determines that indefinite guarantees are unreasonable, a period of at least 10 years should
6 be implemented to secure quality.

7
8 **Q. Would improvements in quality promote the public interest?**

9 A. Yes. The public would immediately benefit from improvements to quality of service that
10 do not involve a rate increase. Economies of scale, cost efficiencies already realized, and
11 best practices identified in testimony should give GPE and Westar the confidence to
12 guarantee the merger's success through improved performance.²⁰ One of the most
13 powerful ways to demonstrate this transaction's value is through measurable, enhanced
14 quality of service. The customer is not likely to appreciate a mere "changing of hands" or
15 a new name inscribed on the side of a white utility truck. However, the customer and
16 shareholder alike will notice enhanced quality. The agreement by GPE and Westar to
17 incrementally improve performance metrics in future years, with a refund point to
18 customers at five years if they have not succeeded will secure quality attributed to the
19 merger. Because the Commission has alluded to enhanced reliability as a primary concern,
20 this opportunity to raise the bar can place the merged utilities on firm footing and guarantee
21 quality far into the future.

22

²⁰ Akin Direct Testimony, p. 4.

1 **Q. Has the Commission ever required a quality of service guarantee in merged**
2 **operation docket?**

3 A. Yes. Quality of service commitments have been ordered by the Commission as a part of
4 settlement agreements in three recent merger dockets: GPE's acquisition of Aquila in
5 Docket No. 07-KCPE-1064-ACQ, One Gas's reorganization Docket No. 14-KGSG-100-
6 MIS, and the Algonquin/Empire acquisition in the 16-410 Docket. Although the service
7 commitment provisions are similar in these dockets, they are uniquely adapted to each
8 transaction.

9

10 **D. Compliance with Merger Standards**

11 **Q. Does the KCC have a set of criteria for evaluating merger transactions?**

12 A. Yes, the Commission adopted a set of merger standards in Docket No. 97-WSRE-676-
13 MER ("97-676 Docket") which outline several factors to consider when evaluating merged
14 operation applications. The KCC expressed in that docket a primary concern that merger
15 transactions should promote the public interest; they clarified that applicants can add
16 additional supplemental facts to illustrate their unique situation, but must demonstrate that
17 the merger will promote the public interest and show a net benefit through a series of factors
18 for consideration.²¹ This approach has been consistently applied by the Commission in
19 many dockets since, and was re-emphasized by the Commission recently in its Order on
20 Merger Standards in the 16-593 Docket.

21

²¹ Order on Merger Application, 97-WSRE-676-MER, September 28, 1999, ¶ 18.

1 **Q. Do the Merger Standards contain a provision for quality of service?**

2 A. Quality of service standards, particularly reliability and customer service, are not
3 mentioned specifically in the Commission’s Order on Merger Standards. However, quality
4 of service is implied in Merger Standard (h), which states:

5 (h) What impact, if any, the transaction has on the public safety.

6 Although Kansas statutes govern the requirements for all electric public utilities to provide
7 sufficient and efficient service to their customers,²² the Commission has considered safety
8 to be a primary concern for merged operations. Public safety in electric utility service is
9 fundamentally a function of reliability and customer service. In the 97-676 Docket, the
10 Commission stated “enhancement of the reliability of electric service is a primary factor
11 when considering the impact of a merger on the public interest.”²³ In the recent order in
12 the 16-593 Docket, Commission concerns for continued reliability through a potential lack
13 of vegetation management, maintenance and system improvements were paramount in
14 concluding the transaction would negatively impact public safety.²⁴

15

16 **Q. Do the Joint Applicants address Merger Standard (h)?**

17 A. Yes, Mr. Akin offers an explanation in his testimony of how the Joint Applicants believe
18 the proposed transaction satisfies Merger Standard (h). Mr. Akin states “the merger is
19 expected to maintain, and possibly improve, the public safety”²⁵ based on the combined
20 companies’ adoption of best practices and leveraged skills. Joint Applicants allege and

²²K.S.A. 66-101b.

²³ Order on Merger Application, Docket No. 97-WSRE-676-MER, September 28, 1999, para. 20.

²⁴ Order, Docket No. 16-KCPE-593-ACQ, April 19, 2017, ¶ 88.

²⁵ Akin Direct Testimony, p. 13.

1 pledge to maintain safety precautions regarding vegetation management, as well as
2 continue full staffing of utility lineperson crews and customer call centers for
3 responsiveness to customer inquiries which they claim addresses prior Commission
4 concerns from the 16-593 Docket.²⁶ In addition, Mr. Akin indicates that “service quality
5 and public safety in many ways overlap,” and through Commitment No. 33 the Joint
6 Applicants have promised positive impact on public safety.²⁷

7
8 **Q. Do you have any reservation that Commitment No. 33 satisfies Merger Standard**
9 **(h)?**

10 A. I do not have any concern that the explanation provided by Mr. Akin satisfies Merger
11 Standard (h), with exceptions. The Joint Applicant’s proposals in Commitment No. 33
12 are a chief step toward guaranteeing safety through penalties (customer refunds).
13 However, I do recommend adjustments to the penalty structure they have proposed, which
14 have been previously discussed. As I indicated, the penalty structure should be enhanced
15 with utility-specific origination benchmarks and additional metrics extended indefinitely
16 for refund, and incentives added for improved performance directly resulting from the
17 merger transaction. According to Mr. Akin, “this Merger will lead to more efficient
18 vegetation management, maintenance, system improvements, and other areas of utility
19 operations that will positively impact public safety and ultimately lead to lower expenses
20 that are paid for by our customers.”²⁸ Unfortunately, the limitations outlined in
21 Commitment No. 33 do not provide adequate ratepayer protections to assure the positive

²⁶ Akin Direct Testimony, p.13.

²⁷ Akin Direct Testimony, p. 15.

²⁸ Akin Direct Testimony, p. 14.

1 impact. With my recommended adjustments to the proposed structure, I believe that
2 Merger Standard (h) has been met.

3
4 **IV. SUMMARY OF RECOMMENDATIONS**

5 **Q. Please summarize your recommendations.**

6 A. The Joint Applicants deserve credit for recognizing that customers should be compensated
7 for the inconvenience and risk they would endure from merger-induced service
8 interruptions or substandard customer care. The Joint Applicants' plan to guarantee quality
9 of service for three years through established penalties for degradations in service is a good
10 start to assuring a successful merger transaction. However, their promises could fall short
11 of satisfactory service guarantees for consumers into the imminent future without the
12 addition of several adjustments that are listed below. I recommend the following
13 adjustments to the Joint Applicant's plan to promote the public interest upon the potential
14 closure of this transaction:

- 15 • Adjust the Joint Applicant's proposed penalty plan to include the CAIDI and ACR
16 (answer call rate) metrics, company benchmarks per company (Westar North,
17 Westar South, and KCP&L), and individually applied penalties (refunds) per
18 company for deteriorated service.
- 19 • Authorize refunds indefinitely (or for at least 10 years following the merger),
- 20 • Require the Joint Applicants to improve their reliability and customer service
21 baseline averages by 5% per metric over the next five (5) years through the
22 establishment of refunds for non-improvement.

23

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

2 A. Yes, it does.

VERIFICATION

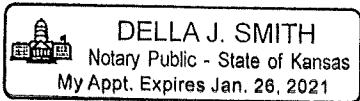
STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

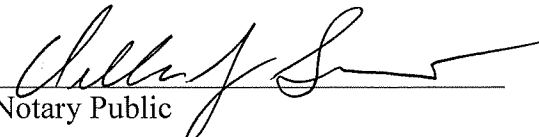
I, Cary Catchpole, of lawful age and being first duly sworn upon my oath, state that I am a Regulatory Analyst for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.



Cary Catchpole

SUBSCRIBED AND SWORN to before me this 29th day of January, 2018.





Notary Public

My Commission expires: 01-26-2021.

APPENDIX A - Schedules

Schedule CPC-1

Schedule CPC-2

Appendix A
Schedule CPC-1

**CURB Recommendations for Quality of Service
Baselines for Reliability and Customer Service
based on 3-Year Averages (2014-2016)***

Distribution Reliability

	KCC Normalized Baselines		
	SAIFI	SAIDI	CAIDI
KCP&L (Kansas only)	0.87	123.01	140.88
Westar North	1.62	184.44	114.47
Westar South	1.34	140.20	104.10

Customer Service Metrics

	KS Baselines		
	ACR	AR	ASL 20-second
KCP&L	44%	2%	77%
Westar	35%	2%	77%

Key:

SAIFI = System Average Interruption Frequency Index

SAIDI = System Average Interruption Duration Index

CAIDI = Customer Average Interruption Duration Index

ACR = Answer Call Rate in a percentage

AR = Abandon Rate in a percentage

ASL 20-Second = Average Service Level of 20 seconds in a percentage.

*(Because the ASL data is not comparable between companies, a measurement from 2015 data is substituted for a three year average.)

Direct Testimony of Cary Catchpole
18-KCPE-095-MER

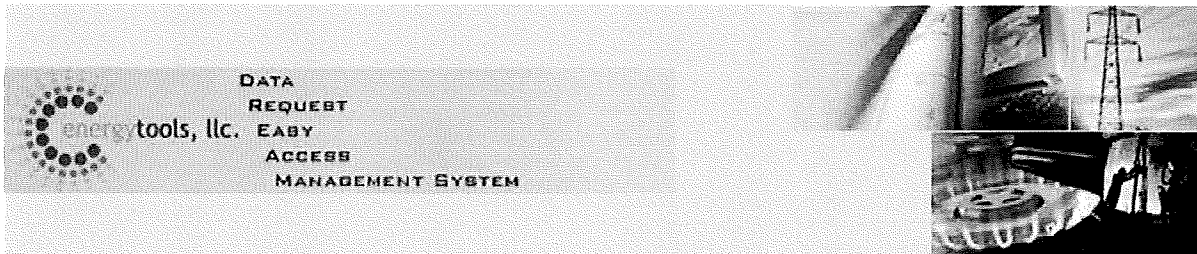
Appendix A
Schedule CPC-2

**CURB Recommendations for Quality of Service
Quality of Service Refund Matrix**

Key Factors	BASELINES	REFUND LEVEL 1		REFUND LEVEL 2		REFUND LEVEL 3		REFUND LEVEL 4 (5-Year)	
		prompt	amount	prompt	amount	prompt	amount	prompt	amount
Kansas City Power & Light									
KCP&L (Kansas)									
SAIFI	0.87	0.92	\$ 35,000	0.97	\$ 70,000	1.01	\$ 105,000	0.83	\$ 35,000
SAIDI	123.01	129.16	\$ 35,000	136.54	\$ 70,000	142.69	\$ 105,000	116.86	\$ 35,000
CAIDI	140.88	147.92	\$ 35,000	156.37	\$ 70,000	163.42	\$ 105,000	133.83	\$ 35,000
ACR	44%	42%	\$ 17,000	40%	\$ 34,000	N/A	N/A	46%	\$ 17,000
AR	2%	2.1%	\$ 17,000	2.2%	\$ 34,000	N/A	N/A	1.9%	\$ 17,000
ASL 20-second	77%	73%	\$ 17,000	69%	\$ 34,000	N/A	N/A	81%	\$ 17,000
Total Refund per Measure			\$ 156,000		\$ 312,000		\$ 315,000		\$ 156,000
Total KCP&L Refund Potential			\$ 156,000		\$ 312,000		\$ 315,000		\$ 156,000
Westar Energy									
Westar North									
SAIFI	1.62	1.70	\$ 35,000	1.79	\$ 70,000	1.88	\$ 105,000	1.54	\$ 35,000
SAIDI	184.44	193.66	\$ 35,000	204.73	\$ 70,000	213.95	\$ 105,000	175.22	\$ 35,000
CAIDI	114.47	120.19	\$ 35,000	127.06	\$ 70,000	132.78	\$ 105,000	108.74	\$ 35,000
ACR (recorded in Westar South)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
AR (recorded in Westar South)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ASL (recorded in Westar South)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Refund per Measure			\$ 105,000		\$ 210,000		\$ 315,000		\$ 105,000
Westar South									
SAIFI	1.34	1.41	\$ 35,000	1.49	\$ 70,000	1.55	\$ 105,000	1.27	\$ 35,000
SAIDI	140.20	147.21	\$ 35,000	155.62	\$ 70,000	162.63	\$ 105,000	133.19	\$ 35,000
CAIDI	104.10	109.31	\$ 35,000	115.55	\$ 70,000	120.76	\$ 105,000	98.90	\$ 35,000
ACR	35%	33%	\$ 17,000	32%	\$ 34,000	N/A	N/A	37%	\$ 17,000
AR	2%	2.1%	\$ 17,000	2.2%	\$ 34,000	N/A	N/A	1.9%	\$ 17,000
ASL 20-second	77%	73%	\$ 17,000	69%	\$ 34,000	N/A	N/A	81%	\$ 17,000
Total Refund per Measure			\$ 156,000		\$ 312,000		\$ 315,000		\$ 156,000
Total Westar Refund Potential			\$ 261,000		\$ 522,000		\$ 630,000		\$ 261,000
MAXIMUM TOTAL REFUND			\$ 417,000		\$ 834,000		\$ 945,000		\$ 417,000

APPENDIX B – Data Requests

CURB-62 (Westar and KCP&L)
CURB-63 (Westar and KCP&L)
CURB-63S (KCP&L)
CURB-89 (Westar)
CURB-90 (KCP&L)
CURB-92 (KCP&L)
CURB-93 (KCP&L)
CURB-94 (Westar)
KCC Staff-30 (Westar)
KCC Staff-31 (KCP&L)



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Tuesday, December 12, 2017
Logged in as: [Della Smith] [Logout](#)

Docket: [18-KCPE-095-MER] Merger of Equals - Great Plains
Requestor: [CURB] [David Nickels]
Data Request: CURB-62 :: Call centers
Date: 0000-00-00

Question 1 (Prepared by Isaac Perez)

Please identify all customer service call centers currently serving KCP&L and Westar customers. For each call center, please provide the current address and number of employees at that location.

Response:

Westar Contact Center 117 employees (94 CSRs, 23 Leadership) Address 100 N. Broadway, Suite 800. Wichita, KS 67201

Attachment File Name	Attachment Note
Isaac Perez Verification 62.pdf	

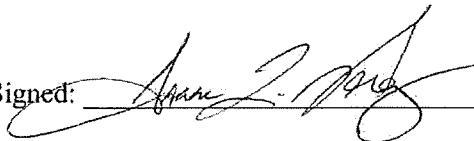
Verification of Response

Westar Energy, Inc.

Docket No. 18-KCPE-095-MER

I have read the foregoing Information Request(s) 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(s).

Signed: _____

 12/5/17

Title: _____

Manager, Customer Relations Center

KCPL KS
Case Name: Westar Merger
Case Number: 18-KCPE-095-MER

Response to Smith Della Interrogatories - CURB_20171130
Date of Response: 12/5/2017

Question:CURB-62

Please identify all customer service call centers currently serving KCP&L and Westar customers. For each call center, please provide the current address and number of employees at that location.

Response:

KCP&L has 2 Call Center locations. The primary location is in Raytown and has 103 employees. The backup site is in Kansas City and currently has 20 employees.

Primary location
10700 State Route Hwy 350
Raytown MO, 64138

Backup location
801 Charlotte St.
Kansas City, MO 64106

Information provided by: Michelle Moore

Attachment: QCURB-62_Verification

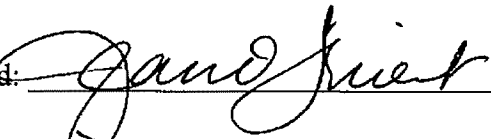
Verification of Response

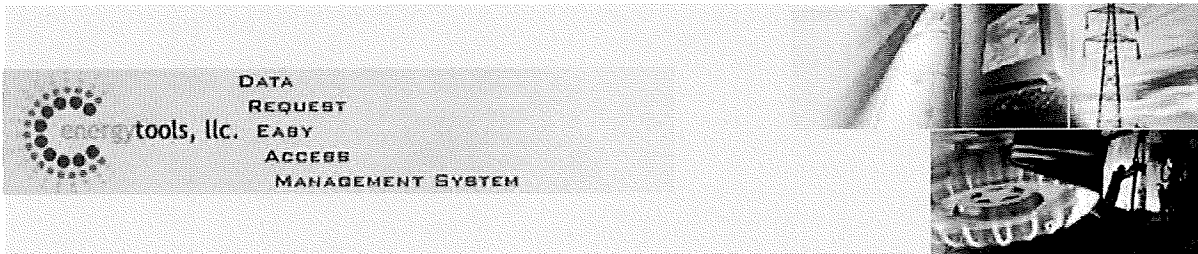
Kansas City Power & Light Company

Docket No. 18-KCPE-095-MER

The response to CURB Data Request# CURB-62, submitted by KCP&L, is covered by this Verification of Response:

I have read the foregoing Information Request(s) 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(s).

Signed: 
Title: Director
Date: 12/1/17



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Tuesday, December 12, 2017
Logged in as: **[Della Smith]** [Logout](#)

Docket: [18-KCPE-095-MER] Merger of Equals - Great Plains
Requestor: [CURB] [David Nickels]
Data Request: CURB-63 :: Call Center Performance Statistics
Date: 0000-00-00

Question 1 (Prepared by Isaac Perez)

Please provide, separately for KCP&L and Westar, call center performance statistics tracked for the last four years for each call center including the following categories: a. Total calls received b. Total calls abandoned c. The average amount of time it takes for calls to be answered by an agent (ASA)

Response:

Westar only. a. Total calls received 2017 2,713,161 (Through Nov. 30) 2016 - 3,034,148
2015 - 3,038,734 2014 - 3,253,806 2013 3,129,658 b. Total calls abandoned 2017
31,979 (Through Nov. 30) 2016 35,895 2015 28,422 2014 121,263 2013 44,769 c.
The average amount of time it takes for calls to be answered by an agent (ASA) 2017 25
seconds (Through Nov. 30) 2016 31 seconds 2015 27 seconds 2014 93 seconds 2013
46 seconds

Attachment File Name	Attachment Note
Isaac Perez Verification 63.pdf	

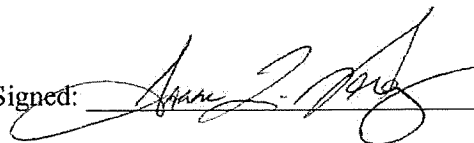
Verification of Response

Westar Energy, Inc.

Docket No. 18-KCPE-095-MER

I have read the foregoing Information Request(s) 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(s).

Signed: _____

 12/5/17

Title: Manager, Customer Relations Center

KCPL KS
Case Name: Westar Merger
Case Number: 18-KCPE-095-MER

Response to Smith Della Interrogatories - CURB_20171130
Date of Response: 12/5/2017

Question:CURB-63

Please provide, separately for KCP&L and Westar, call center performance statistics tracked for the last four years for each call center including the following categories:

- a. Total calls received
- b. Total calls abandoned
- c. The average amount of time it takes for calls to be answered by an agent (ASA)

Response:

Year	Total Calls (Agent)	Abandons	ASA (seconds)
2013	1,746,733	71,699	45
2014	1,690,340	58,418	37
2015	1,608,888	52,675	31
2016	1,626,025	67,778	43

Data above encompasses all of KCP&L (Missouri and Kansas) as well as KCP&L Greater Missouri Operations Company.

Information Provided by: Michelle Moore

Attachment: Q63_Verification

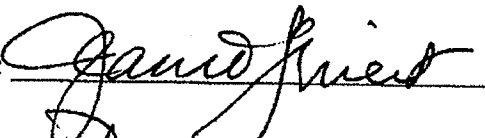
Verification of Response

Kansas City Power & Light Company

Docket No. 18-KCPE-095-MER

The response to CURB Data Request# CURB-63, submitted by KCP&L, is covered by this Verification of Response:

I have read the foregoing Information Request(s) 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(s).

Signed: 
Title: Director
Date: 12/1/17

KCPL KS
Case Name: Westar Merger
Case Number: 18-KCPE-095-MER

Response to Smith Della Interrogatories - CURB_20171130

Date of Response: 1/11/2018

Question:CURB-63S

SUPPLEMENTAL

Please provide, separately for KCP&L and Westar, call center performance statistics tracked for the last four years for each call center including the following categories:

- a. Total calls received
- b. Total calls abandoned
- c. The average amount of time it takes for calls to be answered by an agent (ASA)

Response:

Year	Gross Calls	Abandons	ASA (Seconds)
2013	3,670,809	71,699	45
2014	3,587,282	58,418	37
2015	3,590,234	52,675	31
2016	3,557,200	67,778	43

Data above encompasses all of KCP&L (Missouri and Kansas) as well as KCP&L Greater Missouri Operations Company.

Verification of Response

Kansas City Power & Light Company

Docket No. 18-KCPE-095-MER

The response to CURB Data Request# CURB-63S, submitted by KCP&L, is covered by this Verification of Response:

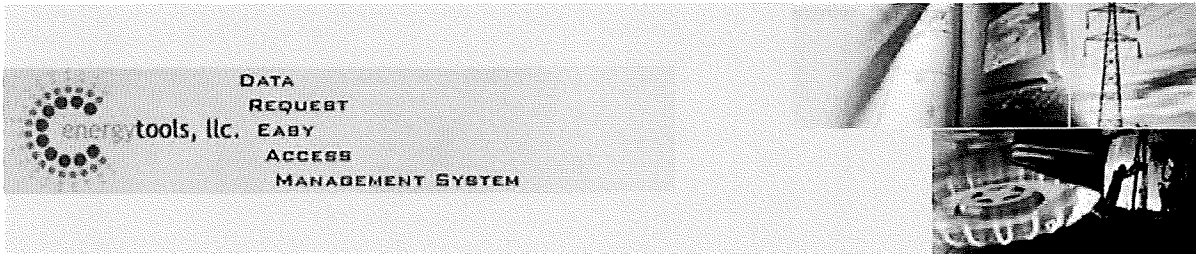
I have read the foregoing Information Request(s) and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered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

Signed: 

Title: Director

Date: January 10, 2018

Direct Testimony of Cary Catchpole
18-KCPE-095-MER



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Wednesday, January 03, 2018
Logged in as: **[Della Smith]** [Logout](#)

Docket: [18-KCPE-095-MER] Merger of Equals - Great Plains
Requestor: [CURB] [David Nickels]
Data Request: CURB-89 :: Contact center established
Date: 0000-00-00

Question 1 (Prepared by Isaac Perez)

Please indicate the date the following Westar Contact Center was established: a. Westar Contact Center, 100 N. Broadway, Suite 800, Wichita, KS, 67201.

Response:

Westar Contact Center was established March 17, 2008.

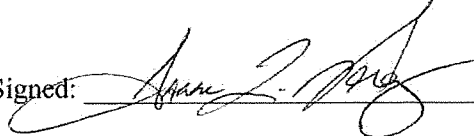
Attachment File Name	Attachment Note
Isaac Perez Verification 89.pdf	

Verification of Response

Westar Energy, Inc.

Docket No. 18-KCPE-095-MER

I have read the foregoing Information Request(s) 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(s).

Signed:  12/5/17

Title: Manager, Customer Relations Center

KCPL KS
Case Name: Westar Merger
Case Number: 18-KCPE-095-MER

Response to Smith Della Interrogatories - CURB_20171215

Date of Response: 12/27/2017

Question:CURB-90

Please indicate the dates the following KCP&L Call Centers were established:

- a. Primary location, 10700 State Route Hwy 350, Raytown, MO, 64138
- b. Backup location, 801 Charlotte St, Kansas City, MO, 64106

Response:

Primary location, 10700 State Route Hwy 350, Raytown, MO, 64138 – Established in 2008

Backup location, 801 Charlotte St, Kansas City, MO, 64106 – Established in 2009

Information Provided By: Michelle Moore

Attachment: QCURB-90_Verification.pdf

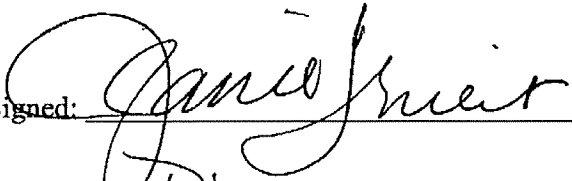
Verification of Response

Kansas City Power & Light Company

Docket No. 18-KCPE-095-MER

The response to CURB Data Request# CURB-90, submitted by KCP&L, is covered by this Verification of Response:

I have read the foregoing Information Request(s) 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(s).

Signed: 
Title: Director
Date: 12/19/17

KCPL KS
Case Name: Westar Merger
Case Number: 18-KCPE-095-MER

Response to Smith Della Interrogatories - CURB_20171215

Date of Response: 12/27/2017

Question:CURB-92

Please provide the total calls answered per year at the KCP&L Call Centers for the last four years.

Response:

Total Agent calls answered at the KCP&L Call Centers are:

2016 – 1,558,247

2015 – 1,556,213

2014 – 1,631,922

2013 – 1,675,034

Information Provided By: Michelle Moore

Attachment: QCURB-92_Verification.pdf

Verification of Response

Kansas City Power & Light Company

Docket No. 18-KCPE-095-MER

The response to CURB Data Request# CURB-92, submitted by KCP&L, is covered by this Verification of Response:

I have read the foregoing Information Request(s) 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(s).

Signed: 

Title: Director

Date: 12/19/17

KCPL KS
Case Name: Westar Merger
Case Number: 18-KCPE-095-MER

Response to Smith Della Interrogatories - CURB_20171215
Date of Response: 12/27/2017

Question:CURB-93

Has KCP&L ever conducted a customer satisfaction survey of the call center services provided to KCP&L customers? If so, please provide the following:

- a. The number of survey participants
- b. A copy of the survey questions asked
- c. The survey results

Response:

The company conducts a Voice of Customer satisfaction survey specific to the contact center through a third party.

- a. 100 monthly survey responses collected from residential customers who recently interacted with the contact center by phone
- b. See attachment A for 2017 customer survey questions
- c. See attachment B for most current (November 2017 YTD) study results

Information Provided By: Erica Penner

Attachments:

QCURB-93_Attachment A.pdf
QCURB-93_Attachment A.pdf
QCURB-93_Verification.pdf

Verification of Response

Kansas City Power & Light Company

Docket No. 18-KCPE-095-MER

The response to CURB Data Request# CURB-93, submitted by KCP&L, is covered by this Verification of Response:

I have read the foregoing Information Request(s) 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(s).

Signed: _____

Title: _____

Date: _____

David Gruit

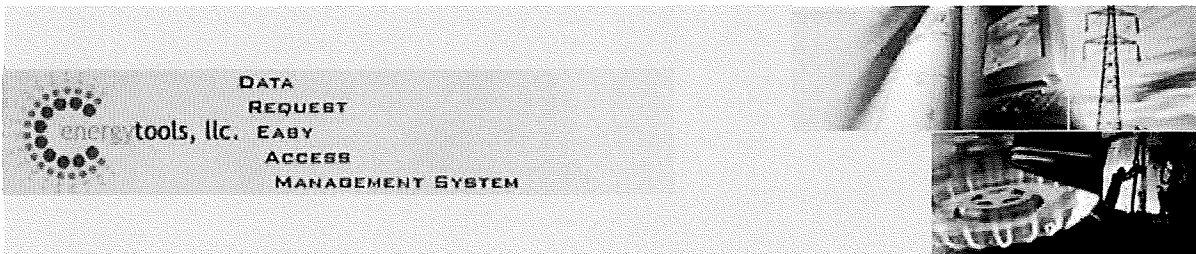
Director

12/19/17

Direct Testimony of Cary Catchpole
18-KCPE-095-MER

KCP&L CALL CENTER CUSTOMER SATISFACTION STUDY
NOVEMBER 2017 RESULTS

	November '17	October '17	November '16	YTD '17	YTD '16
Number of Interviews	102	100	100	1104	1106
Electric Service					
How would you rate the electric service that KCP&L provides? (Average)	8.3	8.7	9.0	8.8	8.7
Reason for Calling					
Primary reason for calling - billing issue/question	19%	25%	31%	23%	26%
Primary reason for calling - start service	19%	15%	5%	14%	13%
Primary reason for calling - to pay bill	11%	12%	12%	13%	14%
Primary reason for calling - report an outage or other power issue	9%	7%	4%	9%	9%
Primary reason for calling - transfer service	7%	6%	2%	10%	7%
Primary reason for calling - stop service	7%	6%	3%	5%	6%
Primary reason for calling - payment options information/enrollment	7%	4%	10%	5%	6%
Primary reason for calling - reconnect service	6%	3%	2%	3%	2%
Primary reason for calling - to make payment arrangements	4%	7%	4%	6%	7%
Primary reason for calling - financial assistance program	2%	0%	1%	1%	1%
Primary reason for calling - KCP&L's service (complaints)	1%	0%	1%	0%	1%
Primary reason for calling - tree trimming	0%	0%	0%	1%	1%
Primary reason for calling - energy conservation programs and/or rebates	0%	0%	3%	1%	1%
Primary reason for calling - other	6%	10%	3%	6%	4%
Primary reason for calling - refused	4%	5%	19%	3%	4%
Starting and Transferring Service	n=25	n=20	n=6	n=258	n=216
Average rating - process of starting/transferring service in terms of being easy and smooth (among those who called to start or transfer service)	9.3	9.6	9.8	9.4	9.0
Average rating - process of starting/transferring service in terms of being completed in a timely fashion (among those who called to start or transfer service)	9.3	9.7	9.8	9.5	9.0
Average rating - KCPL's start-up/transfer process compared with other utility companies (among those who called to start or transfer service)	7.9	8.2	9.4	8.6	8.5
Which one of the following areas do customers suggest KCP&L focus its efforts to improve their start-up and transfer service processes					
Providing an option to submit the order online	16%	25%	17%	27%	17%
Improving the service provided by customer service representatives	16%	10%	0%	9%	4%
Improving the speed in which the turn on/transfer service request is completed for your home	8%	10%	17%	9%	7%
Improving the order process and time during initial call	0%	10%	17%	7%	9%
None of the above	60%	60%	50%	60%	66%
How Call Handled					
Call handled by ATS only	14%	10%	14%	9%	11%
Call handled by CSR	83%	89%	85%	89%	87%
The ATS					
Average rating - Overall	7.3	8.4	8.2	8.0	7.8
% placed on hold	24%	21%	26%	23%	22%
Length of time on hold (average in minutes, among those placed on hold)	3.8	4.7	4.1	4.6	4.5
Average rating - Speed of reaching a CSR	8.4	7.9	8.6	8.4	8.6
The CSR					
# of transfers (average, among those transferred)	1.5	1.1	1.2	1.5	1.4
Average rating - Listening attentively to your unique personality and situation	8.6	9.0	9.1	9.1	9.2
Average rating - Their ability to answer your question or resolve your problem on the first call	8.7	8.8	8.8	9.0	9.1
Average rating - Their ability to provide caring and individual attention to you	8.7	8.6	9.0	9.1	9.2
Average rating - Having sufficient knowledge	8.7	8.8	8.9	9.0	9.2
Average rating - Overall	8.6	8.9	8.6	9.1	9.1
Issue Resolution					
% Problem/issue resolved during the first call	84%	82%	78%	87%	87%
% Called back to resolve problem/issue, ask question (among those whose problem/issue wasn't resolved during first call)	53%	36%	45%	51%	50%
# of times called back (average - among those who had to call back)	5.4	2.8	2.3	3.0	2.8
% feel problem/issue resolved	86%	89%	85%	91%	90%
Overall Call Experience					
Total length of time on call (average in minutes)	10.3	11.2	11.5	11.1	11.2
Average rating - Overall customer service experience	8.4	8.6	8.6	8.9	8.9
Average rating - KCPL's service compared with other utility companies	7.8	8.0	8.4	8.2	8.6
Customer Background					
# of times called KCP&L in past 12 months (Average)	5.0	4.0	4.9	4.4	4.4
# of times visited the KCP&L website in past 12 months (Average)	3.0	3.3	2.3	3.2	2.7
Primary method to pay KCP&L bill - Phone call to KCP&L	34%	33%	32%	30%	29%
Primary method to pay KCP&L bill - Online banking	19%	20%	20%	20%	19%
Primary method to pay KCP&L bill - Mail payments	18%	9%	14%	16%	15%
Primary method to pay KCP&L bill - Pre-authorized automatic deduction	11%	17%	11%	14%	10%
Primary method to pay KCP&L bill - Through KCP&L website	9%	11%	11%	12%	13%
Primary method to pay KCP&L bill - Pay station	4%	14%	16%	8%	11%
Primary method to pay KCP&L bill - Other	2%	2%	0%	2%	2%
Primary method to pay KCP&L bill - Don't know/refused	7%	1%	4%	5%	7%



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Wednesday, January 03, 2018
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Docket: [18-KCPE-095-MER] Merger of Equals - Great Plains
Requestor: [CURB] [David Nickels]
Data Request: CURB-94 :: Customer Survey
Date: 0000-00-00

Question 1 (Prepared by Isaac Perez)

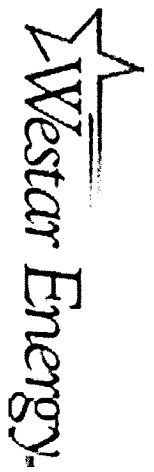
Has Westar ever conducted a customer satisfaction survey of the call center services provided to Westar customers? If so, please provide the following: a. The number of survey participants b. A copy of the survey questions asked c. The survey results

Response:

a. The number of survey participants As of September 2017 we had 6,727 b. A copy of the survey questions asked See attachment. c. The survey results As of November 2017 the Customer Relations Center (Contact Center) has a mean score of 4.36 (out of 5).

Attachment File Name	Attachment Note
inMoment Survey Questions.docx	
Isaac Perez Verification 94.pdf	

CRC Summary Report



Report run: 1/15/2018 8:42 AM CST
Data current as of: 1/15/2018 8:41 AM CST

REPORT CRITERIA

Select Level: Ginger Elsea (Department Leader)
Date of Survey: 1/1/17 - 12/31/17
Feedback Channel: CRC

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Direct Testimony of Cary Catchpole
 18-KCPE-095-MER

Totals	Select Level:	Select Level:	Overall Experience	Time to Reach CSR	Length to Answer Questions	Knowledge	Concern for Resolution	Total Comments	Total Surveys
Totals	Ginger Elsea (Department Leader)		4.37	4.21	4.4	4.43	4.39	3,951	10,154
Totals	Ginger Elsea (Department Leader)	Isaac Perez (Manager)	4.37	4.21	4.4	4.43	4.39	3,951	10,154

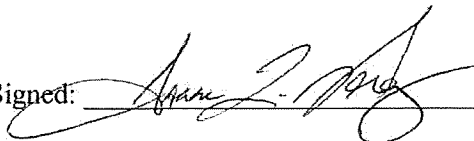
Verification of Response

Westar Energy, Inc.

Docket No. 18-KCPE-095-MER

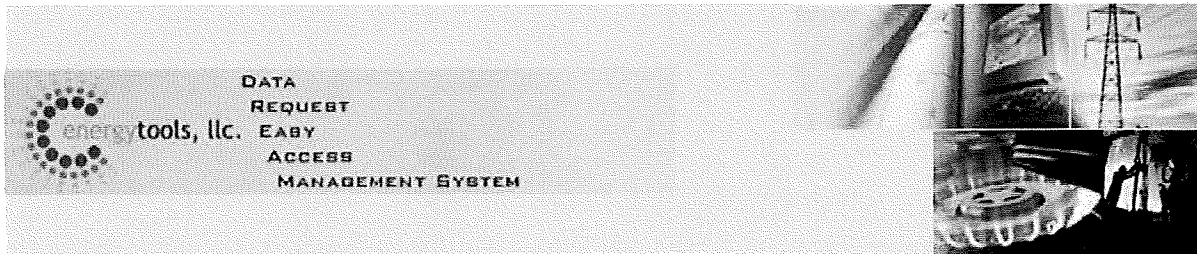
I have read the foregoing Information Request(s) and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered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

Signed: _____

 12/5/17

Title: _____

Manager, Customer Relations Center



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Tuesday, November 14, 2017
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Docket: [18-KCPE-095-MER] Merger of Equals - Great Plains
Requestor: [KCC] [Leo Haynos]
Data Request: KCC-30 :: Quality of Service Westar Reliability Calculations
Date: 0000-00-00

Question 1 (Prepared by Dave Rose)

A. Provide normalized SAIDI and SAIFI in an excel spreadsheet format for Westar north and Westar south for 2012-2016 using the IEEE 1366 methodology. B. Provide normalized SAIDI and SAIFI in an excel spreadsheet format for Westar north and Westar south for 2012-2016 using the normalization method defined in the 02-365 Docket October 4, 2006 Order. C. Provide data of SAIDI and SAIFI in an excel spreadsheet format for Westar north and Westar south for 2012-2016 with no normalization methodology applied.

Response:

See 'Summary' tab in the attached spreadsheet for comparison table.

Attachment File Name	Attachment Note
KCC-30.xlsx	

Westar North Year	SAIDI		SAIFI	
	UnNormalized	IEEE Normalized(1)	UnNormalized	IEEE Normalized(1)
2012	140.13	106.58	1.46	1.32
2013	139.15	103.54	1.47	1.26
2014	169.97	125.29	1.66	1.46
2015	236.33	137.05	1.75	1.46
2016	147.02	116.95	1.44	1.26

Westar South Year	SAIDI		SAIFI	
	UnNormalized	IEEE Normalized(1)	UnNormalized	IEEE Normalized(1)
2012	277.31	117.25	1.51	1.14
2013	380.99	135.47	1.67	1.27
2014	112.82	106.87	1.24	1.21
2015	291.04	107.71	1.67	1.28
2016	161.59	150.36	1.37	1.31

Note 1: Subsidiary IEEE normalization based on subsidiary customer count using Westar Tmed

KCPL KS
Case Name: Westar Merger
Case Number: 18-KCPE-095-MER

Response to Haynos Leo Interrogatories - KCC_20171031
Date of Response: 11/09/2017

Question:31

- A. Provide normalized SAIDI and SAIFI in an excel spreadsheet format for KCP&L Kansas for 2012-2016 using the IEEE 1366 methodology.
- B. Provide normalized SAIDI and SAIFI in an excel spreadsheet format for KCP&L Kansas for 2012-2016 using the normalization method defined in the 02-365 Docket October 4, 2006 Order.
- C. Provide data of SAIDI and SAIFI in an excel spreadsheet format for KCP&L Kansas for 2012-2016 with no normalization methodology applied.

Number of Attachments:

Response:

<i>Normalized – IEEE 1366</i>		
Year	SAIDI	SAIFI
2016	71	0.7
2015	79.2	0.75
2014	66.5	0.66
2013	54.8	0.55
2012	51.5	0.52

<i>Normalized per Docket 02-365</i>		
Year	SAIDI	SAIFI
2016	117.28	0.87
2015	138.69	0.89
2014	113.06	0.86
2013	109.3	0.76
2012	72.8	0.64

Direct Testimony of Cary Catchpole
18-KCPE-095-MER

<i><u>Un-normalized</u></i>		
Year	SAIDI	SAIFI
2016	117.3	0.87
2015	138.7	0.89
2014	113.1	0.86
2013	211	0.92
2012	72.80	0.64

Information provided by: Phillip DeGrace; Distribution System Operations
Attachment: Q31_Verification

Verification of Response

Kansas City Power & Light Company

Docket No. 18-KCPE-095-MER

The response KCC Data Request# 31, submitted by KCP&L, is covered by this Verification of Response:

I have read the foregoing Information Request(s) 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(s).

Signed: 

Title: Miss DSO

Date: 11/06/17

APPENDIX C - Exhibits

Exhibit CPC-3

Exhibit CPC-4

Appendix C
Exhibit CPC-3

KANSAS CITY POWER & LIGHT COMPANY
Annual Kansas Reliability Performance Report
(January 1, 2016 – December 31, 2016)
To the Kansas Corporation Commission
April 28, 2017
Docket No. 02-GIME-365-GIE

Section 7(a)(1-2) – PREVIOUS FIVE YEARS RELIABILITY STATISTICS

Table 1: Reliability Indices – 2012-2016						
Normalized Consistent with Docket No. 02-GIME-365-GIE Normalization Standards (Kansas Only)						
Reporting Year		2012	2013	2014	2015	2016
Total Customers (Calculated by Meter Counts)		246,759	251,401	254,226	255,676	259,658
Normalized*	SAIDI	72.80	109.30	113.06	138.69	117.28
	SAIFI	0.64	0.76	0.86	0.89	0.87
	CAIDI	113.70	143.70	131.87	156.29	134.47
Without Normalization	SAIDI	72.80	210.50	113.06	138.69	117.28
	SAIFI	0.64	0.92	0.86	0.89	0.87
	CAIDI	113.70	230.00	131.87	156.29	134.47

*No storms met the 02-365 Docket exclusion criteria in 2016.

Westar Energy, North

Five-Year Assessment of SAIFI, SAIDI, & CAIDI by Subsidiary

Subsidiary	Year	SAIFI	SAIDI	CAIDI	Normalized Events
North	2012	1.475	140.1	95.0	0
	2013	1.475	139.1	94.3	0
	2014	1.621	169.9	104.8	0
	2015	1.726	233.2	135.2	0
	2016	1.419	146.8	103.4	0

Note: Years 2012-2016 were normalized by the KCC Major Event classification.

Kansas Gas and Electric Company Westar Energy, South

Five-Year Assessment of SAIFI, SAIDI, & CAIDI by Subsidiary

Subsidiary	Year	SAIFI	SAIDI	CAIDI	Normalized Events
South	2012	1.225	164.0	133.8	2
	2013	1.448	186.5	128.8	1
	2014	1.287	116.7	90.7	0
	2015	1.408	146.2	103.8	1
	2016	1.406	165.6	117.8	0

Note: Years 2012-2016 were normalized by the KCC Major Event classification.

CERTIFICATE OF SERVICE

18-KCPE-095-MER

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Direct Testimony was served by electronic service on this 29th day of January, 2018, to the following:

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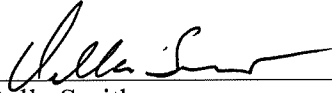
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