

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

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**REBUTTAL TESTIMONY**

**OF**

**ROBIN ALLACHER**

**ON BEHALF OF**

**WESTAR ENERGY, INC.**

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**DOCKET NO. 18-WSEE-328-RTS**

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**I. INTRODUCTION**

**Q. PLEASE STATE YOUR NAME.**

A. My name is Robin Allacher.

**Q. ARE YOU THE SAME ROBIN ALLACHER WHO FILED DIRECT  
TESTIMONY IN THIS DOCKET?**

A. Yes.

**Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

A. I will discuss Westar's response to the testimony provided by KCC Staff (Mr. Hutton) and CURB (Ms. Crane) relating to EEI membership and dues adjustments.

1       **Q.     PLEASE EXPLAIN MR. HUTTON’S PROPOSED ADJUSTMENT IS-18**  
2       **AND MS. CRANE’S PROPOSED ADJUSTMENT ACC-30.**

3       A.     Both KCC Staff and CURB propose to remove 50 percent of the expenses  
4             incurred during the test year for memberships and dues for business,  
5             industry, technical and professional organizations such as the Chamber of  
6             Commerce, EEI, The National Coal Transportation Association, and other  
7             professional organizations.

8       **Q.     DO YOU AGREE WITH MR. HUTTON AND MS. CRANE’S PROPOSALS**  
9       **TO REDUCE WESTAR’S MEMBERSHIPS AND DUES EXPENSE BY**  
10       **50%?**

11      A.     No. Both Mr. Hutton and Ms. Crane rely on an erroneous interpretation of  
12             a Kansas statute to support their proposed adjustment. They justify their  
13             proposed adjustments by citing K.S.A. 66-101f(a) which states:

14                     The Commission may adopt a policy of disallowing a  
15                     percentage, not to exceed 50% of utility dues, donations and  
16                     contributions to charitable, civic and social organizations and  
17                     entities, in addition to disallowing specific dues, donations and  
18                     contributions which are found unreasonable or inappropriate.

19                     Both KCC Staff and CURB mistakenly apply the statute to all  
20                     memberships and dues, including the membership and dues for business,  
21                     industry, and technical organizations that I mentioned previously. K.S.A.  
22                     66-101f(a) allows the Commission to limit the recovery of dues made to  
23                     charitable, civic, and social organizations and entities as well as other  
24                     donations and contributions that are found to be unreasonable or  
25

1 inappropriate. Mr. Hutton and Ms. Crane misapply this statute to  
2 memberships and dues for business and professional organizations.

3 **Q. WHY SHOULD THESE MEMBERSHIPS AND DUES BE INCLUDED IN**  
4 **WESTAR'S ALLOWABLE EXPENSES?**

5 A. These memberships are in associations that help promote economic  
6 development as well as provide professional and technical information  
7 necessary for Westar's employees to understand new laws and regulations  
8 that affect the utility industry. Westar can better serve its customers when  
9 employees obtain continuing education and information on contemporary  
10 thinking in their professional fields of expertise. Customers benefit from a  
11 highly skilled workforce and should have the costs of maintaining that skill  
12 level reflected in their cost of service.

13 **Q. WHAT DO YOU RECOMMEND TO THE COMMISSION?**

14 A. I recommend the Commission reject Mr. Hutton and Ms. Crane's proposed  
15 adjustments for memberships and dues.

16 **Q. THANK YOU.**

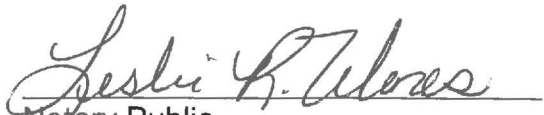
STATE OF KANSAS                    )  
  ) ss:  
COUNTY OF SHAWNEE            )

**VERIFICATION**

Robin Allacher, being duly sworn upon her oath deposes and states that she is the Regulatory Analyst Senior for Westar Energy, Inc., that she has read and is familiar with the foregoing Rebuttal Testimony, and attests that the statements contained therein are true and correct to the best of her knowledge, information and belief.

  
Robin Allacher

Subscribed and sworn to before me this 3<sup>rd</sup> day of July, 2018.

  
Notary Public

My Appointment Expires: 5/30/2022

