

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

In the Matter of the Application of ITC Great Plains,)
LLC and Mid-Kansas Electric Company, LLC for a)
Siting Permit for the Construction of a 345 kV) Docket No. 13-ITCE-677-MIS
Transmission Line in Cloud and Ottawa Counties,)
Kansas.)

DIRECT TESTIMONY

OF

MICHAEL J. WEGNER, P.E.

Received
on

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by
State Corporation Commission
of Kansas

**ON BEHALF OF THE STAFF OF
THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

May 31, 2013

1 Q. Please state your name.

2 A. Michael J. Wegner.

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

4 A. I am employed by the Kansas Corporation Commission (KCC or Commission) at
5 1500 SW Arrowhead Road, Topeka, Kansas, 66604-4027. I am the Chief of
6 Energy Operations.

7 Q. Please summarize your educational and professional background.

8 A. I received a Bachelor of Science degree in Electrical Engineering with an
9 emphasis on Power Engineering from North Dakota State University (Fargo,
10 North Dakota) in 1993. I am a registered Professional Engineer in the State of
11 Kansas, PE #14968, and hold a Project Management Professional Certificate from
12 the Project Management Institute (PMI). My professional experience started in
13 1993 with Black and Veatch, where I worked on power plant projects designing
14 cathodic protection, grounding, and lightning protection systems. In 1999, I
15 shifted from design work to customer interaction with Kansas City Power & Light
16 Company (KCP&L), where I was assigned to the Education Segment as an
17 Account Service Engineer. I was responsible for working with the largest
18 education customers in the Kansas City metro area. Specifically, I was
19 responsible for project management of improvements to KCP&L's distribution
20 system that resulted from the growth and additional energy demand requests from
21 my assigned customers. I also worked with KCP&L's largest
22 telecommunications customers. In 2006, I started a consulting firm and

1 performed contract work for Cricket Communications. In 2010, I began work
2 with the KCC in my current position as Chief of Energy Operations.

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

4 A. Yes. I have testified in the following Dockets: 10-ITCE-557-MIS, 11-WSEE-
5 377-PRE, 11-PWTE-600-MIS, 11-ITCE-644-MIS, 11-KCPE-581-PRE, 11-
6 MDWE-609-RTS, 11-GBEE-624-COC, 11-GIME-597-GIE, 12-WCNE-136-GIE,
7 12-MKKEE-650-TAR, 12-KCPE-764-RTS, 13-SEPE-433-TAR, 13-MKKEE-434-
8 TAR, 13-MKKEE-447-MIS, and 13-WSEE-676-MIS.

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

10 A. My testimony will address the "reasonableness" of the location of the ITC Great
11 Plains, LLC (ITC or Company) Preferred Route for a 345,000 volt (345 kV)
12 transmission line from ITC's Elm Creek Station to an interconnect point with
13 Westar Energy along Justice Road, approximately one mile east of 210th Road in
14 central Ottawa County, Kansas, consistent with the "Electric Transmission Line
15 Siting Act", K.S.A. 66-1,177 et seq., and amendments thereto. This line will
16 address reliability issues related to the north-central Kansas area for the loss of the
17 Elm Creek – Northwest Manhattan 230 kV line.¹ The addition of this project will
18 reduce the reliability risk of losing the Manhattan to Elm Creek 230 kV line. The
19 installation of this project will address potential voltage collapse for the
20 Concordia area during certain contingency conditions, increasing opportunities
21 for load growth and economic growth in and around Concordia, providing for a

¹ Direct Testimony of Mr. Alan K. Myers, page 2, lines 17-19,

1 stronger and more robust grid, reduce line losses, and provide for more efficient
2 use of existing generation resources.²

3 Staff member Tom DeBaun will provide testimony to address the necessity of the
4 line as well as the benefits of building the line.

5 **Q. Are you sponsoring exhibits in this testimony?**

6 A. No. I will frequently reference Exhibit 1³ in the Direct Testimony of Mr.
7 Salvatore Falcone, which is part of ITC's Application. Exhibit 1 illustrates the
8 overall route designated by ITC as its "Preferred Route" and is defined by a
9 yellow line on the map provided in Appendix B of Exhibit 1 of Mr. Falcone's
10 testimony.⁴ Exhibit 1 of Mr. Falcone's testimony was prepared by Black &
11 Veatch Corporation (B&V) and will be referred to as the "Route Selection Study"
12 throughout my testimony.

13 The Application, including the Route Selection Study, reflects commentary and
14 analysis as of the end of March 2013. However, the Commission and ITC have
15 continued to receive additional public input since the Application was filed on
16 May 3, 2013, which should be considered as well.

17 **Q. Please provide an overview of the Preferred Route.**

18 A. Almost all of the Preferred Route is routed through uninhabited areas, row crop
19 fields and pasture. The ITC portion of this project does come in proximity to a
20 home and a communication tower. Other than these two situations, the line is
21 routed approximately a half mile or more from other manmade objects.

² Direct Testimony of Mr. Kelly B. Harrison, page 4, lines 13 – 20, Docket 13-WSEE-676-MIS.

³ Route Selection Study, Elm Creek to Summit 345 kV Transmission Line Project Cloud and Ottawa Counties for ITC Great Plains.

⁴ Map of Preferred Route.

1 **Q. What is Staff's opinion on reasonableness of the Preferred Route?**

2 A. Staff recommends that the Preferred Route is reasonable because the Preferred
3 Route was determined using a scoring system, landowner input, efforts to
4 minimize the length of the line, and it avoids areas of concerns such as critical
5 environmental habitat.

6 **Q. On what do you base your recommendation that the Preferred Route is**
7 **reasonable?**

8 A. I base my opinion on the Route Selection Study, the Testimony of Mr. Salvatore
9 Falcone, and Staff's reconnaissance of the Preferred Route.

10 **Q. Please explain how your testimony on the "reasonableness" issue is**
11 **organized.**

12 A. My testimony will address the reasonableness of the selected route in the
13 following order:

- 14 1) ITC's route selection methodology;
- 15 2) Staff's review of the Preferred Route;
- 16 3) Other considerations and public comment; and
- 17 4) Conclusion

18

19 **ITC's Route Selection Methodology**

20 **Q. What did Staff look for in ITC's Application?**

21 A. Staff reviewed the Application to confirm the Applicant had considered and
22 included in its filing the following:

- 1 1) Valid criteria to evaluate the different proposed routes was established
2 and followed;
- 3 2) Confirmation that careful consideration was given regarding the impact
4 of routes upon sensitive resources which include houses, irrigation, oil and
5 natural gas related equipment and storage, general farm use,
6 environmental and archeological aspects and other resources; and
- 7 3) Confirmation that public input was solicited early in the route study.

8 **Q. Did ITC seek outside help in routing this line?**

9 A. Yes. ITC contracted with B&V for routing assistance. B&V was also the
10 contractor that supported Westar Energy with the routing of its portion of this
11 project. As such, the Preferred Route filed in this Docket and Docket 13-WSEE-
12 676-MIS combines the second best ranked score of ITC with best ranked score of
13 Westar Energy.

14 **Q. How did ITC select the preliminary routes?**

15 A. ITC identified six (6) areas of concern for use when developing the preliminary
16 routes. In an effort to develop alternatives that would provide economical routes
17 and minimize the adverse social and environmental impacts, the following criteria
18 were used⁵:

- 19 1) Avoid proximity of the line to residences, businesses and public
20 facilities;
- 21 2) Avoid crossing over center pivot irrigation systems;
- 22 3) Parallel existing utilities, roads or railroads when practical;
- 23 4) Avoid wetlands, riparian areas and conservation lands;

⁵ Direct Testimony of Salvatore Falcone, page 3, lines 20-23; and page 4, lines 1-2.

- 1 5) Avoid placing the line directly over tanks and oil, gas, or water wells;
2 and
3 6) Maintain reasonable length with as few angles as possible to minimize
4 costs.

5 **Q. What criteria were used to establish the "Preferred Route" in ITC's**
6 **Application?**

7 A. ITC and B&V defined a study area for possible transmission routes.⁶ B&V
8 established evaluation criteria and assigned a value to each type of land in order to
9 compute a composite score. The Route Selection Study indicates that a total of 27
10 routes were identified for the entire project.⁷ The ITC portion of the project
11 identified 4 routes and the Westar Energy portion of the project identified 19
12 routes. B&V scored each of the 27 routes individually⁸ and the route with the
13 lowest score was submitted as the Preferred Route.⁹

14 **Q. What types of land use ranked as most important and least important?**

15 A. The Route Selection Study cited Developed-High Intensity and Open Water as the
16 two areas to avoid; while Barren Land and Flood Zones no greater than 800 feet
17 wide were given the highest preference as land to site transmission towers on or
18 near.¹⁰

19 **Q. Were construction issues weighted in the composite score?**

⁶ *Id.*, Figure 1-1, Elm Creek to Summit Study Area.

⁷ *Id.*, Table 4-1: Route Numbers and Segments, page 4-3.

⁸ *Id.*, Table 4-2: Elm Creek to Summit Route Scores, page 4-5 and 4-6.

⁹ *Id.*, Table 4-2, Route 4 has the lowest overall score, 480.47.

¹⁰ *Id.*, Table 4-5, page 4-9.

1 A. Yes. The Route Selection Study considered the number of angle structures¹¹,
2 river crossings, railroad crossings, and highway crossings.

3 **Q. What method did ITC use to solicit early public input?**

4 A. ITC sought public input during public open houses hosted December 4 through
5 December 6, 2012, in Miltonville, Bennington, and Salina, Kansas. During the
6 open houses, the project routing details were presented to landowners and other
7 interested parties and the Company sought to obtain individual perspectives on
8 proposed line routes.

9 **Q. Do you believe ITC's public awareness method was reasonable?**

10 A. Yes. Because the Commission's time is so limited after the Application is filed, it
11 is important for the Company to get public feedback upfront.

12 **Q. Please explain the submittal of the second lowest score?**

13 A. The difference between the lowest ranked score of ITC (Route I1 - 206.67) and
14 the second lowest score of ITC (Route I2 - 206.86) was 0.19. The second lowest
15 score from the ITC route options was chosen because this portion was part of the
16 overall route that provided the lowest ranked score for the entire project (Route 4
17 - 480.47). Had the lowest ranked score of ITC (Route I1) been combined with
18 the second lowest ranked score of Westar Energy (Route - W2), the result would
19 have been the second lowest ranked score overall (Route 8 - 486.17).¹²

20 **Q. Was the route selection process reasonable?**

21 A. The selection process of the Preferred Route was a rigorous undertaking which
22 seems to have successfully considered both technical requirements and subjective

¹¹ *Id.* Table 4-5, page 4-9, assigned different weights to angles depending on their degrees.

¹² *Id.* Table 4-2 shows the scores for all 27 routes that cover the entire project.

1 preferences based on comments received from landowners. In Staff's opinion the
2 route selection methodology is logical and thorough. Section 4.0 of the Route
3 Selection Study explains the alternate routes and the results of the evaluation
4 process in depth.

5 It is Staff's opinion that the process described in Route Selection Study is
6 reasonable and results in a reasonable location of the Preferred Route.

7

8

Staff's Review of the Preferred Route

9 **Q. Has Staff conducted a visual inspection of the Preferred Route as filed in**
10 **ITC's siting Application?**

11 A. Yes. I observed the route and areas adjacent to the route on May 9, 2013, to the
12 extent possible on a one-day route inspection.

13 Some portions were in areas that I was not able to view from public access
14 roadways. These inaccessible areas were reviewed via Google Earth, an online
15 aerial photography tool.

16 In examining the route, Staff was primarily interested in observing land use,
17 specifically looking at:

- 18 1) Proximity to residences;
- 19 2) The position of homes with respect to the line and any groves
20 separating homes from the preferred route;
- 21 3) Cemeteries;
- 22 4) Terrain features;
- 23 5) Public parks and recreation areas;

- 1 6) Areas that appeared to be sensitive to wildlife and prairie vegetation
2 native to the area woodlands;
3 7) Line construction challenges; and
4 8) Impacts in the segments of new Right of Way (“ROW”).

5 **Q. What is the width of the ROW for this project?**

6 A. The route will require new easements or ROW that are 200 feet wide.¹³ This
7 width may vary some and will be determined by the detailed design of the project.

8 **Q. Were any interested parties interviewed during your field investigation?**

9 A. No. Land owners were not interviewed during Staff’s visual inspection. The
10 purpose of the route inspection was to drive the entire route and observe the use
11 of the land and structural developments.

12 **Q. What observations do you have to share with the Commission?**

13 A. The following are Staff’s observations related to the Preferred Route:

- 14 • Generalized potential conflicts include rugged terrain, river/creek
15 crossings, highway crossings, railroad crossings, and transmission line
16 crossings. Potential conflicts such as these will be present in any route.
17 • Staff observed one home and a communication tower that will be
18 approximately 1000 feet from the center line of the Preferred Route,
19 neither of which pose a problem for the Preferred Route.
20 • Staff did not observe any center pivot point irrigators, oil pumps, or
21 storage tanks.

¹³ Direct Testimony of Mr. Alan K. Myers, page 6, line 8.

1 Staff understands that the detailed design of the project may include micro-siting
2 the towers to work around any objects that may cause conflicts.

3 **Q. What is the purpose of observing these potential conflicts?**

4 A. The purpose of Staff's observation was to make sure these potential conflicts were
5 accounted for in ITC's route selection methodology. After further review of the
6 Route Selection Study, Staff is of the opinion that the information and data is
7 consistent with our field observations.

8 **Q. Did you observe any alternative routes that Staff would recommend ITC and
9 the Commission consider?**

10 A. No. My observations indicate that the routing of this line, while being routed
11 near¹⁴ a home, is a reasonable route.

12

13 Other Considerations and Public Comment

14 **Q. Are there other considerations that Staff uses when determining the
15 reasonableness of ITC's Preferred Route for the transmission line proposed
16 in its Application?**

17 A. Yes. In Staff's opinion the following are important considerations:

18 1) In electrical terms, generally, a straight line from point A to point B is
19 ideal because line losses are the absolute minimum, while available
20 transmission capacity would be maximized. Routing maps were reviewed
21 and are consistent with the straight line considerations.

¹⁴ Greater than a 1000 feet.

1 2) In terms of physical construction, generally, a straight line from point
2 A to point B is ideal because the materials and labor would be the absolute
3 minimum, which keeps financial and environmental (as related to the
4 quantity of material required) costs to a minimum.

5 3) The basis for the selection of the Preferred Route over alternative
6 routes is an importation consideration.

7 4) Reasonable public feedback should be considered and given appropriate
8 weight. ITC has solicited public feedback from the public open houses.

9 5) Proximity to structures, developments, and other physical and
10 environmental obstructions is another consideration.

11 Additional comments that arise at the public hearing in Minneapolis, Kansas, on
12 June 3, 2013, as well as other public input submitted in written form through the
13 Kansas Corporation Commission's Office of Public Affairs and Consumer
14 Protection, should be considered by the Commission.

15 **Q. Is Commission determination regarding the reasonableness of the selected**
16 **route the only determinant of whether the proposed line can be built?**

17 A. No. The Commission's determination in this Docket is definitive only from the
18 standpoint of jurisdictional matters such as location of the Preferred Route and
19 with respect to the Commission's responsibility for enforcing the National
20 Electrical Safety Code. If the Preferred Route is approved by the Commission,
21 ITC will still have to obtain additional permits, endorsements, or may have
22 additional studies to complete for other agencies.

23 **Q. What is Staff's opinion regarding the importance of public input?**

1 A. It is important for the public, and specifically landowners that are affected by the
2 route, to be able to provide input in the decision making process. This input aids
3 ITC in understanding how the land is used. While engineers, surveyors, and
4 biologists can exhaustively analyze routes, properties, and issues, but landowner's
5 input is critical to understanding problems that may not be obvious. So, hosting
6 public open houses early in the process is essential to the process of determining
7 the Preferred Route.

8 **Q. Do Kansas statutes require the public open house meetings you discussed**
9 **above?**

10 A. No. Informational meetings (public open houses) or solicitation of public
11 comment prior to filing an Application for transmission siting with the
12 Commission are not required by Kansas statute. However, Staff's experience
13 suggests that communication and solicitation of public comment is desirable prior
14 to the filing of an Application for transmission line siting of a specific route.
15 Staff's use of the phrase "public comment" means solicited or voluntarily
16 contributed input from any "person" meaning generally any individual,
17 partnership, corporation, unit of government, or other interested parties, including
18 non-governmental organizations. The statutory requirement for a Commission
19 public hearing after a transmission routing Application has been filed appears in
20 K.S.A 66-1,178 and will be met with a public hearing scheduled by the
21 Commission for June 3, 2013, in Minneapolis, Kansas.

22 **Q. To your knowledge, did B&V contact federal, state, and local agencies to**
23 **acquire data from other third party sources?**

1 A. Yes. Appendix D of the Route Selection Study includes the feedback that B&V
2 received from the following agencies:

- 3 1) The University of Kansas on threatened, endangered and special
4 concern species;
- 5 2) Kansas Historical Society;
- 6 3) Kansas Department of Wildlife, Parks and Tourism;
- 7 4) Kansas Department of Health and Environment;
- 8 5) United States Department of Agriculture (USDA);
- 9 6) United States Department of Army; and
- 10 7) United States Department of Interior.

11 **Q. Based on your review, did the Route Selection Study consider the feedback**
12 **from these agencies?**

13 A. Yes, it did. The USDA indentified a quarter section of land that is a designated
14 part of the Grassland Reserve Program (on the Westar Energy portion of the
15 route).

16 It is Staff's opinion that ITC has worked with public agencies and has made small
17 adjustments to reach the route that has been presented in the Application.

18 Certainly, the Commission will need to consider all comments received in this
19 Docket, including those from the June 3, 2013, public hearing and during the
20 public comment period which follow the filing of testimony.

21 Staff acknowledges the efforts of ITC and its consultant in producing valuable
22 information regarding public feedback on matters pertaining to reasonableness of
23 the route.

1

2

Conclusion

3 **Q. Are there statutory limitations the Commission should be aware of regarding**
4 **your testimony and the conclusions you present?**

5 A. Yes. The statutory time allotted for Commission response to any Transmission
6 Siting Application is very brief. After Staff's filing, other state and federal
7 agencies, non-governmental organizations, and the public will have the
8 opportunity to present additional evidence to the Commission. In this Docket, ITC
9 has had a year or more to develop its Line Siting Application, while Staff has had
10 approximately four-weeks to evaluate the aspects of "necessity" and
11 "reasonableness of route."

12 Given that time frame, Staff has attempted to evaluate the Application and routing
13 process and address landowner concerns, as well as, geographic, environmental,
14 and other matters based upon observation of the route, public input prior to the
15 date of Staff's filing, and the content of ITC's Application. Other concerns may
16 come to light after Staff's filing of testimony which may need to be addressed in
17 supplemental filings.

18 **Q. What are your conclusions or recommendations regarding this filing?**

19 A. Based on an examination of the Application and information available to Staff at
20 this time, it is Staff's opinion that ITC's study of the possible routes is
21 comprehensive and the Preferred Route proposed in the Application is reasonable.
22 Generally, some inconvenience will result with respect to some individual
23 interests along the route of any proposed transmission line. The interests of those

1 inconvenienced along a proposed line must be balanced against the benefits of the
2 route pertaining to all other stakeholders along the line and others benefiting from
3 its construction.

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

5 **A.** Yes.

6

7

CERTIFICATE OF SERVICE

13-ITCE-677-MIS

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 3rd day of June, 2013, to the following parties who have waived receipt of follow-up hard copies.

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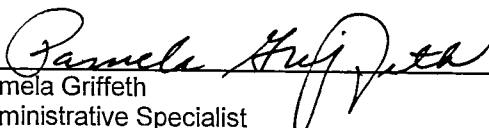
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