

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

In the Matter of a General Investigation)
for the Purpose of Investigating Whether)
Annual or Periodic Cost/Benefit Reporting) Docket No. 17-SPPE-117-GIE
by SPP and Kansas Electric Utilities that)
Participate in SPP is in the Public Interest.)

**COMMENTS OF SUNFLOWER ELECTRIC POWER CORPORATION
AND MID-KANSAS ELECTRIC COMPANY, LLC**

COMES NOW, Sunflower Electric Power Corporation ("Sunflower") and Mid-Kansas Electric Company, LLC ("Mid-Kansas"), by and through their counsel, and hereby submits their initial comments in response to the Order Opening General Investigation issued on January 19, 2017.

I. Introduction

1. Sunflower and Mid-Kansas operate as generation and transmission cooperatives located in central and western Kansas, and each is a transmission owning member ("TO") of SPP. Sunflower is a consumer-owned corporation operated on a non-profit, cooperative basis by six rural electric distribution cooperatives that in turn serve approximately 50,000 retail meters located in 32 western Kansas counties. Sunflower also serves at wholesale, directly or indirectly, 9 small cities. Sunflower's base-load generation plant is a coal-fired, 360 MW steam unit located near Holcomb, Kansas. Sunflower also has 219 MW of natural gas-fired generation in Garden City, Kansas and 50 MW of wind generation. Sunflower owns or leases, and operates more than 1,100 miles of 345 kV, 115 kV, and 69 kV transmission lines. Sunflower owns and operates 48 substations, 64 SCADA units, and 14 microwaves sites.

2. Mid-Kansas is a consumer-owned limited liability company operated on a non-profit, cooperative basis by five rural electric cooperatives and a sixth member that is owned by a rural electric cooperative that in turn serve approximately 71,000 meters in 33 counties, and 7 full and partial wholesale requirements municipalities. Mid-Kansas owns and operates approximately 1,222 miles of transmission line facilities, 60 associated substation facilities, 389 MW of gas-fired generation and 128 MW of wind generation. Sunflower employees operate Mid-Kansas' generation and transmission assets pursuant to an operation and service agreement.
3. Sunflower and Mid-Kansas appreciate the opportunity to comment in the current docket on the matters before the Commission. As a matter of convenience, Sunflower and Mid-Kansas will jointly file their comments in response to the Commission's inquiry.

II. General Comments

4. Sunflower became a member of SPP on April 4, 2006. Mid-Kansas became a member of SPP on March 19, 2007. Since joining as members and with the advent of SPP becoming a Regional Transmission Organization ("RTO"), SPP has been evolving ever since. In a few short years, SPP initiated a comprehensive regional transmission planning process and launched the Integrated Market. Not only has there been rapid and intense growth of services during this period, SPP has had to adjust to the rapidly changing political and technical events affecting the electric utility industry. With the rapid expansion of wind resources, environmental regulations and a broader and more expansive role of FERC, SPP and its membership have witnessed a major transformation of the electric industry in a very short timeframe. With that in mind, Sunflower and

Mid-Kansas commend the Commission for opening this docket to assess the value of membership in SPP and the ultimate value to the wholesale transmission and electric retail customers who eventually pay the cost.

5. Examining the value of SPP to the membership is not something that SPP and its membership have overlooked. SPP has conducted a variety of reports and studies initiated by SPP and its membership, as well as in response to other state regulatory bodies. Sunflower understands that the Arkansas, Missouri and New Mexico commissions have in the past initiated reporting or studies, some of which have now been rescinded due to cost and lack of value in the information.
6. Sunflower and Mid-Kansas assert as a general proposition that SPP has provided significant value to its members and their wholesale and retail electric customers. Due to the breadth and width of regional transmission planning, it is difficult to quantify the value in dollars that Sunflower and Mid-Kansas have received. Although value in some specific instances can be measured, it is just as important to assess the value on a qualitative basis as well. From the Sunflower and Mid-Kansas perspective, the regional transmission planning process has been extremely important and very beneficial. It has provided a formal process to address transmission needs on a holistic basis; thereby, addressing transmission restraints and system reliability far better than was possible before the advent of centralized regional planning. SPP has provided a forum to address transmission limitations which are beyond the control of a specific utility. Without it, incumbent transmission owners are left to solve the problems in less efficient and more costly ways.
7. Since 2009, SPP has been required by its Open Access Transmission Tariff ("OATT") to assess the cost/benefits to members of regionally allocated

transmission projects. This assessment is commonly known as the Regional Cost Allocation Report (“RCAR”).¹ The report systematically assesses the cost and benefits to each utility of transmission build out and upgrades in the regional bulk electric system. This is a holistic assessment depicting the measured benefit to each incumbent TO. The analysis has been modified in the recent RCAR II report.

8. The RCAR II analysis indicates that Sunflower and Mid-Kansas receive substantial benefits from the current build out of Highway/Byway transmission projects. In fact, the present value of the 40-year projection of benefits and costs show that Mid-Kansas has a 1.28 benefit-to-cost (“B/C”) ratio, while Sunflower has a 3.73 B/C ratio. On a combined basis, Sunflower and Mid-Kansas would have a B/C of 1.87, while the B/C for SPP as a whole is 2.45. Sunflower believes that most of the benefits assigned to its systems are not sustainable for the next 40 years as they are mostly skewed based on congested hours where the wind gets trapped in its zones and the price of purchasing energy becomes very low. So, to assume Sunflower or Mid-Kansas will always benefit from trapped wind over the next 40 years is not realistic as more transmission will be built to ease congestion and will drive energy prices higher in these zones. Regardless, Sunflower and Mid-Kansas find value in being a member of SPP.
9. SPP also prepared the Rate Impact Analysis report which utilizes some of the same data as the RCAR II analysis. The purpose of the Rate Impact Analysis is to convert the costs and quantitative benefits associated with SPP transmission expansion plans into impacts on retail ratepayers. The analysis used only

¹ RCAR does not cover all regionally allocated projects. For example, SPP has advised Z2 projects were not required to be included in RCAR although most of the costs are regionally recovered.

- Highway/Byway projects and the benefits from RCAR II that can be monetized which affect retail ratepayer bills for a 1,000 kWh retail customer at year 2025.
10. The 2016 Rate Impact Analysis differed from the RCAR II analysis in two important ways. First, the Rate Impact Analysis is a short-term snapshot of the benefits resulting from transmission while the RCAR II is a long-term snapshot. Second, the Rate Impact Analysis is an evaluation of the benefits to retail ratepayers as opposed to overall benefit to SPP TOs and loads. The results of the Rate Impact Analysis show that the total monthly retail rate impact for Mid-Kansas is \$5.90 and for Sunflower is (\$0.34). The study shows that Mid-Kansas' retail rate impact is by far the highest in the SPP footprint.
 11. Again, to emphasize the point made earlier, the disparity between the long-term benefit analysis and the short term is due in part to the fact the RCAR process focuses on wind congested hours to calculate benefits over 40 years. This approach is appropriate if wind congestion is to continue for the next 40 years, but that is not expected. Therefore, utilities like Sunflower and Mid-Kansas (that host a significant amount of wind) show higher rate impact than other utilities in SPP due to their small size from a load prospective and due to the burden of hosting and exporting vast amounts of wind to the rest of the SPP region. As a result, the cost for new transmission to export the wind energy out the Sunflower and Mid-Kansas zones is allocated to Sunflower and Mid-Kansas on the basis of the geographic location of the transmission lines and not on the geographical location of the end user who actually benefits from the new transmission.
 12. The disparity is also due in part to large investment in reliability projects in sparsely populated rural areas resulting in significantly higher cost impacts to customers in Sunflower and Mid-Kansas zones. In sparsely populated areas, the

cost of the reliability project is socialized across a smaller number of ratepayers, while in a more densely populated area, the cost is spread across greater numbers and the per capita cost is less. This problem is related to the growth of wind while load remains flat. Also, the benefits calculated do not take into consideration that incumbents build transmission for reliability with excess capacity, the wind generators are consuming that excess capacity at little or no cost to them, shortening the useful life of the capacity for reliability, forcing the build out of even more transmission for reliability at the expense of others.

13. The SPP membership needs to recognize that in a rapidly transforming industry the analysis cannot remain static. It requires constant reassessment and readjustment. With the rapid expansion of renewables, specifically wind, in western Kansas, the current cost allocation is placing an inequitable burden on ratepayers in certain wind-rich-but-customer-sparse transmission zones, like Sunflower and Mid-Kansas. It also requires recognition that in certain instances decisions concerning reliability projects requires considering its affordability and who legitimately should pay for the projects. It is critically important to address these concerns now, before it is too late to reverse consequences by failing to study the implications now and addressing them.
14. Current cost/benefit analysis point to the fact the rules today do not adequately account for the disparity in costs to small rural utilities that primarily serve the wind rich areas. The analysis of benefits and costs are measured in a vacuum and fail to adequately allocate the costs to the cost causers and those benefiting from renewable generation. Clearly, this is an area ripe for the SPP Cost Allocation Working Group (“CAWG”) to focus on and arrive at an equitable formula for cost allocation. If nothing more, the CAWG should recommend the

ability for a utility to seek remedies based not only on the RCAR process but also based on the rate impact study that identifies which customers are paying the most while getting the least benefits. Other options can be generated through constructive discussions with SPP staff and SPP members to bring fairness to the process and to minimize obstacles to building new transmission in wind rich areas to serve loads in SPP, and, at the same time protecting ratepayers in the wind host zones from paying transmission costs for facilities that do not directly serve them but serve as a way to move wind out of their zones to SPP loads.

15. There are other areas within the SPP transmission planning process that can improve benefits to membership. SPP should develop a standard of service criteria or a guide for local planning under the SPP tariff to assist utilities in determining which transmission projects may be uplifted into the SPP for cost recovery and which may not. Customers are at risk to pay for projects that do not add meaningful benefits. Without an informative criteria and process, a constructed project outside of the SPP planning process may later be uplifted for zonal cost recovery on the basis it provides benefit to the zone, while in reality it only provides benefit to one customer in the zone. SPP should utilize and point to local TO's planning criteria before allowing new transmission facilities be uplifted to the local TO's zone. In addition, SPP should consider non-transmission alternative solutions equal to transmission solutions for meeting reliability requirements and achieving the least cost option.
16. None of these points raised are a reason to conclude the cost outweighs the value of SPP membership. The savings from reduced manpower, system-wide transmission planning, economic dispatch and the spreading of the risk of significant load loss, all support the value of SPP without the necessity of new or

additional reports or studies. More importantly, these are all matters requiring attention and resolution by the membership. Certainly, the Commission can play an important role in advancing the resolution of these matters.

III. Responses to Specific Questions

17. The Commission seeks comments from the parties on the following questions from Staff's R&R, along with any other questions or information the parties deem relevant to the issue of the costs and benefits of continued participation in SPP:

(a) In the event that the Commission requires a study to determine the costs and benefits associated with continued membership in SPP, what specific parameters should be included in the study?

Response:

The current studies performed by SPP provide a wide range of assessments of value for the membership. However, current studies are prospective in nature and lack an assessment to determine if the projected costs and benefits actually occurred. If a study is required, the study parameters should include an evaluation of the actual results to the projections and adjust for significant changes in underlying assumptions.

(b) Should the study be limited to a comparison of production cost savings associated with the Integrated Market (IM) versus the increased transmission expense and SPP Administration expense associated with membership in SPP?

Response:

See III (a) above. Since Midwest Energy was kind enough to share its comments early, Sunflower and Mid-Kansas would concur with Midwest Energy's list of services that should be studied to fully assess the value of SPP's services.

(c) Should two separate cost/benefit studies be completed with one on the cost/benefits of the IM and the other on the cost/benefits of the transmission system?

Response:

Any such study should be inclusive of both.

(d) Should the study be performed by an independent third party consultant, or can this analysis be performed by internal expertise within the utilities?

Response:

Any study should be conducted with the assistance of SPP, Kansas utilities and an independent party with the expertise to provide a valid analysis. However, there would need to be a clear understanding of the purpose and objective of the study. Before launching such a study, it would be prudent to ascertain the costs of the study in relation to the benefit of the report, especially in relation to the studies already conducted by SPP and its membership. As an alternative to an independent study, the KCC could perhaps recommend refinement to the current SPP studies to glean information which the KCC believes would be beneficial without the necessity of independent study. This could be more cost effective than an independent study.

(e) How often should such a study be updated once performed?

Response:

The determination for updating is a function of the results. If the initial study satisfactorily addresses the concerns, it may not be necessary to revisit the study.

(f) How quantifiable and objective would such an analysis be?

Response:

Any study requires it to be well thought out with quantifiable and measurable objectives.

(g) Without a study, is it possible to say with certainty whether Kansas ratepayers are better off today with Kansas electric utilities being members of SPP? Would it be possible after the study?

Response:

See Section II above.

(h) What evidence exists today regarding the costs/benefits of SPP membership that Kansas ratepayers are benefiting from Kansas utility participation in SPP?

Response:

Demonstrated savings in the IM is the primary driver for benefits to the Kansas ratepayer. Sunflower would also submit that Kansas ratepayers benefit from various other services provided by SPP which if performed on an individual utility basis would cost more than the cost by SPP and would be less effective.

(i) Over what time period should the study cover? Should the study cover the last five years, ten years, or only since the implementation of the IM?

Response:

The time period depends upon the goals and objectives of the study. With the IM market launched in 2014, and if only energy savings will be a part of the study, anything earlier than 2014 would not be appropriate. However, to address a broader evaluation of costs and benefits, the study should have a start date that picks up the bulk of the projects at their in-service date. This may require a date earlier than 2014.

(j) Should the study attempt to reflect the anticipated costs and benefits of continued SPP membership for the foreseeable future using data that is known or that can be determined with certainty today?

Response:

See III (a) above. The RCAR II study is prospective in nature and with certain refinement would be a usable and useful tool.

(k) What alternatives to SPP membership exist for Kansas electric utilities today?

Response:

There are a number of alternatives for Kansas utilities, but it would seem most would just be a duplication of the current system. Financially, it is difficult, if not impossible, to suggest a viable alternative.

(l) Should the study, if required, compare the costs and benefits of SPP to membership in the Midwest Independent System Operator (MISO)?

Response:

We are not advocating for such a study, but it is likely such a study would be cost prohibitive and of little value if there is no one is advocating leaving SPP. The cost of exiting SPP for Kansas utilities would be substantial.

(m) What other Regional Transmission Organizations or regional transmission planning entities, if any, should be considered in the analysis of alternatives?

Response:

MISO and ERCOT.

(n) Is it feasible for Kansas to form its own regional transmission planning entity similar to what New York and California have done? If so, should the costs and benefits of that possibility be evaluated in this study?

Response:

Is highly likely Kansas forming its own RTO would be cost prohibitive.

Furthermore, the benefit of risk spreading and manpower saving would not justify the creation and operation of a state-standalone RTO.

(o) If Kansas utilities were not members of SPP, would there still be opportunities to pursue economy energy sales/purchases from the IM?

Would other entities or SPP still use transmission facilities owned by Kansas utilities? To what extent should this be included in the effects of a possible cost/benefit study?

Response:

According to SPP, SPP membership is not required for participation in the SPP Integrated Market.

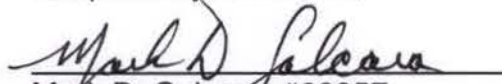
(p) If Kansas utilities were not members of SPP, would there still be opportunities for Kansas utilities to sell transmission capacity on the facilities located in Kansas and owned by Kansas utilities? To what extent should this be included in the effects of a possible cost/benefit study?

Response:

Section 8.7.3 of the SPP Bylaws states that a Terminated Member shall remain financially responsible for all financial obligations incurred and costs allocated to its load for transmission facilities approved prior to the Termination Date. Kansas utilities may have the opportunity to sell transmission capacity but would still be responsible all transmission service obligations up to the time SPP membership was terminated. Additionally, SPP members may not have to continue to pay for regional portions of facilities constructed in the withdrawing members zone. It is doubtful that any sale of transmission capacity after withdrawal from SPP would overcome the financial obligation to SPP of a withdrawing member.

WHEREFORE, Sunflower and Mid-Kansas request that the Commission take notice of Sunflower's and Mid-Kansas' initial comments in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark D. Calcara", is written over a horizontal line.

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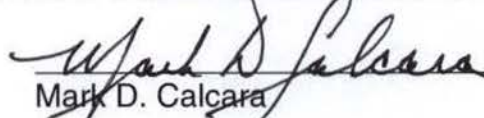
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VERIFICATION

STATE OF KANSAS)
COUNTY OF ELLIS) ss:

Mark D. Calcara, of lawful age, being first duly sworn on oath, states:

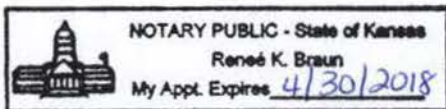
That he is an Attorney for Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC; that he has read the above and foregoing Comments of Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC and knows the contents thereof; and that the statements contained therein are true.


Mark D. Calcara

SUBSCRIBED AND SWORN to before me this 21st day of April, 2017.


Notary Public – Reneé K. Braun

Commission Expires: April 30, 2018



CERTIFICATE OF SERVICE

I do hereby certify that on the 21st day of April, 2017, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing Comments with a copy e-mailed to:

/s/ Renee K. Braun

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