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Kansas Corporation Commission
/S/ Patrice Petersen-Klein

BEFORE THE CORPORATION COMMISSION

OF THE STATE OF KANSAS

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by
State Corporation Commission
of Kansas

IN THE MATTER OF THE JOINT	]	
APPLICATION OF WESTAR ENERGY, INC.	]	
AND KANSAS GAS AND ELECTRIC	]	KCC Docket No. 12-WSEE-112-RTS
COMPANY FOR APPROVAL TO MAKE	]	
CERTAIN CHANGES IN THEIR CHARGES	]	
FOR ELECTRIC SERVICE	]	

DIRECT TESTIMONY OF

ANDREA C. CRANE

RE: REVENUE REQUIREMENTS AND COST OF CAPITAL

ON BEHALF OF

THE CITIZENS' UTILITY RATEPAYER BOARD

January 5, 2012

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I. STATEMENT OF QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Andrea C. Crane and my business address is 90 Grove Street, Suite 211, Ridgefield, Connecticut 06877. (Mailing Address: PO Box 810, Georgetown, Connecticut 06829)

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

A. I am President of The Columbia Group, Inc., a financial consulting firm that specializes in utility regulation. In this capacity, I analyze rate filings, prepare expert testimony, and undertake various studies relating to utility rates and regulatory policy. I have held several positions of increasing responsibility since I joined The Columbia Group, Inc. in January 1989. I became President of the firm in 2008.

Q. Please summarize your professional experience in the utility industry.

A. Prior to my association with The Columbia Group, Inc., I held the position of Economic Policy and Analysis Staff Manager for GTE Service Corporation, from December 1987 to January 1989. From June 1982 to September 1987, I was employed by various Bell Atlantic (now Verizon) subsidiaries. While at Bell Atlantic, I held assignments in the Product Management, Treasury, and Regulatory Departments.

Q. Have you previously testified in regulatory proceedings?

A. Yes, since joining The Columbia Group, Inc., I have testified in over 350 regulatory proceedings in the states of Arizona, Arkansas, Connecticut, Delaware, Hawaii, Kansas, Kentucky, Maryland, New Jersey, New Mexico, New York, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Vermont, Washington, West Virginia and the District of Columbia. These proceedings involved electric, gas, water, wastewater, telephone, solid waste, cable television, and navigation utilities. A list of dockets in which I have filed testimony since January 2008 is included in Appendix A.

Q. What is your educational background?

A. I received a Master of Business Administration degree, with a concentration in Finance, from Temple University in Philadelphia, Pennsylvania. My undergraduate degree is a B.A. in Chemistry from Temple University.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony?

A. On August 25, 2011, Westar Energy, Inc. and Kansas Gas and Electric Company (collectively "Westar" or "Company") filed an Application with the Kansas Corporation Commission ("KCC" or "Commission") seeking a rate increase of $90.8 million. The requested increase would result in an average overall increase of approximately 8.79% over test year base rate revenue. The Columbia Group, Inc. was engaged by the State of Kansas, Citizens' Utility Ratepayer Board ("CURB") to review the Company's Application and to provide recommendations to the KCC regarding the Company's revenue requirement and cost of capital claims. In addition, CURB is also sponsoring the testimony of Brian Kalcic on certain rate design issues.

Q. What are the most significant issues in this rate proceeding?

A. The most significant issues driving Westar's rate increase request are: 1) the Company's claim for a return on equity of 10.60%; 2) the inclusion of construction work in progress in rate base; 3) recovery of deferred costs relating to pensions and other post-employment benefits ("OPEBs"); 4) prospective increases in pension expenses; 5) weather normalization adjustments to reflect the impact of normal weather conditions on electric sales; 6) requested increases in vegetative management programs; 7) recovery of costs associated with the most recent Wolf Creek Outage; and 8) recovery of past costs resulting from ice storms. These cost increases are partially offset by the Company's requested decline in depreciation rates.

III. SUMMARY OF CONCLUSIONS

Q. What are your conclusions concerning the Company's revenue requirement and its need for rate relief?

A. Based on my analysis of the Company's filing and other documentation in this case, my conclusions are as follows:

1. The twelve months ending March 31, 2011, is an acceptable test year to use in this case to evaluate the reasonableness of the Company's claims.
2. Westar has a pro forma capital structure that includes 50.04% common equity, 44.66% long-term debt, 3.99% short-term debt, 0.38% preferred stock, and 0.93% post-1970 investment tax credits ("ITCs"), as shown in Schedule ACC-2.[1]
3. The Company has a pro forma cost of equity of 8.85%, as shown in Schedule ACC-3 and an overall cost of capital of 7.54%, as shown in Schedule ACC-2.
4. Westar has a test year pro forma rate base of $3,749,762,254 as shown in Schedule ACC-9.
5. Westar has pro forma operating income at present rates of $255,722,116 as shown in Schedule ACC-14.
6. The Company has a test year, pro forma, revenue deficiency of $44,858,841 as shown on Schedule ACC-1. This is in contrast to Westar's claimed deficiency of $90,832,779. CURB's recommendation reflects the inclusion in rate base of $275.5 million of plant-in-service and of $145.4 million in construction work in progress ("CWIP") that was previously approved for recovery through the Environmental Cost Recovery Rider ("ECRR").
7. The Commission should reject the tracking mechanism that Westar proposes as an option for funding vegetative management costs.

1 Schedules ACC-1, ACC-34, and ACC-35 are summary schedules, ACC-2 to ACC-8 are cost of capital schedules, ACC-9 to ACC-13 are rate base schedules, and ACC-14 to ACC-33 are operating income schedules.

8. CURB reserves the right to supplement its recommendations based upon responses to discovery that were received on December 29, 2011. In addition, CURB reserves the right to adopt recommendations made by Staff or other parties in this proceeding with regard to depreciation rates or other accounting issues.

IV. INTRODUCTION

Q. Before discussing your specific recommendations, do you have any general comments about the Company's filing?

A. Yes, I do. It should be noted that much of the requested increase is the result of prior regulatory decisions of the KCC and/or statutory requirements. For example, since the Company's last general rate base, the KCC approved a mechanism that permits Westar to defer certain pension and OPEB costs that exceed the amounts currently being recovered in rates. This mechanism is responsible for approximately $12.45 million of the Company's requested rate increase. Moreover, that $12.45 million only reflects a single year of a proposed three-year amortization, so that deferred pension and OPEB costs that Westar is passing on to ratepayers in this case total $37.34 million. These are costs that would have been borne by shareholders under a traditional regulatory approach but which are now being passed through to ratepayers pursuant to the recently-approved tracker mechanism. The Company's claim includes $182.8 million in CWIP, much of which is required to be included in rate base as the result of legislation promoted by utility companies. Prior to such legislation, these costs also would have been borne by shareholders, not ratepayers, until such time as the plant was in-service and actually providing electric utility service to Kansas ratepayers. However, because of changes in legislation, ratepayers are now forced to "pre-pay" for this plant, putting further pressure on utility rates and providing shareholders with the benefit of receiving a return on this plant well in advance of putting it into utility service.

The Company's claim also includes $19.7 million of deferred storm damage costs, on which shareholders will continue to earn a return, and amortization expense of almost $6.2 million associated with ice storms. Again, these are costs that have been "pre-approved" by the KCC for recovery. In the absence of the accounting orders granting the Company's requests to recover these costs, such costs would have been borne by shareholders.

Q. Does the Company's filing present a complete picture of the financial impact on ratepayers in Kansas?

A. No, it does not. The Company has proposed several adjustments to base rates that will be offset by adjustments to some of its surcharge mechanisms. For example, Westar is proposing a reduction in plant-in-service of $275.5 million to reflect plant that is currently being recovered through the ECRR. While this adjustment would decrease the Company's rate base, and therefore its pro forma base rates, ratepayers would still pay for this plant through the ECRR. Thus, the Company's adjustment does not result in any net savings to ratepayers. Similarly, the Company is proposing to transfer wholesale revenue associated with its firm contracts from the Annual Cost Adjustment ("ACA") component of the Retail Energy Adjustment Clause ("RECA") mechanism to base rates. Thus, this adjustment will increase pro forma revenue at present rates and thereby reduce the Company's base rate request, but this transfer will also result in a corresponding increase to the ACA component of the RECA in the next annual filing. Thus, some of the Company's adjustments do not have a net impact on the overall amount to be paid by ratepayers.

Q. In addition to the rate increases granted by the KCC in this case, are ratepayers likely to experience additional increases for utility service provided by Westar?

A. Yes. The rates that are the subject of this proceeding are only the Company's base rates. In addition to these base rate increases, customers will experience further increases relating to fuel cost increases for fuel used in Company-owned generation facilities, increases due to additional wind generation acquired through previously-approved purchased power agreements, incremental costs for additional environmental projects, surcharges for future property tax increases through the Property Tax Surcharge ("PTS"), increases in transmission costs that will be directly passed through to ratepayers in the Transmission Delivery Charge ("TDC"), and costs for energy-efficiency programs recovered through the Energy Efficiency Rider ("EER"). As shown in the response to CURB-72, ratepayers were charged $520 million for these surcharges in 2010 alone. Through August 31, 2011, ratepayers were charged over $407 million relating to these additional clauses. Thus, base rates do not present a complete picture of the rate impact on Kansas ratepayers. In evaluating the Company's request in this case, the KCC should be mindful of the fact that base rate increases are only one component of the rate increases that will be passed along to Kansas ratepayers in the near future. Perhaps more importantly, the KCC should bear in mind that between base rate case filings, increases in many of the costs that would have been funded by shareholders under a traditional regulatory approach will now be deferred and recovered from ratepayers in future cases. Such surcharge and deferral mechanisms have allowed shareholders to significantly reduce their cost exposure and therefore their risk, a fact that is often not explicitly considered when determining an appropriate return on equity.

V. COST OF CAPITAL AND CAPITAL STRUCTURE

Q. What is the cost of capital and capital structure that the Company is requesting in this case?

A. The Company utilized the following capital structure and cost of capital in its filing:

	Percent	Cost	Weighted Cost
Common Equity	51.11%	10.60%	5.42%
Long Term Debt	47.48%	6.65%	3.16%
Preferred Stock	0.41%	4.55%	0.02%
Post 1970 ITCs	1.00%	8.68%	0.09%
Total			8.68%[2]

Q. What capital structure have you used in the development of your recommended revenue requirement?

2 Numbers do not add up to 100% due to rounding.

A. I have utilized the updated capital amounts provided by the Company in its response to KCC-322. This response reflected actual capital balances at October 31, 2011, with a pro forma adjustment to reflect additional equity from forward equity transactions that settled on November 17, 2011. In addition, I have included short-term debt in the Company's capital structure. Since short-term debt balances fluctuate from month-to-month, I utilized the average monthly balances for the test year, as reported in the response to CURB-89.

Q. Why are you recommending the inclusion of short-term debt in the capital structure, since you did not make a similar recommendation in Westar's prior base rate case?

A. The treatment of short-term debt by regulatory commissions generally depends upon the treatment of CWIP. This is because short-term debt is used primarily to finance capital projects during their construction period. When I first began testifying before the KCC, CWIP was generally not included in a utility's rate base for ratemaking purposes. Therefore, including short-term debt in Westar's capital structure could have been viewed as providing the benefit of this lower-cost capital to ratepayers without requiring ratepayers to pay a return on the assets that were being financed by this capital. The Kansas legislature subsequently adopted legislation requiring the KCC to include certain CWIP in rate base. In this case, my rate base recommendation includes almost $300 million of CWIP. Moreover, the Company's rate base also includes other components that are traditionally financed through short-term debt, such as materials and supplies, prepayments, and fuel inventory. Given the fact that ratepayers are now paying a return on assets traditionally financed by short-term debt, it is appropriate to include short-term in the capital structure and to give ratepayers the benefit of this lower-cost capital. Therefore, at Schedule ACC-2, I have included short-term debt as a component of my recommended capital structure.

Q. What capital cost rates are you recommending?

A. I have utilized the Company's proposed cost rates, as shown in the response to KCC-322, for long-term debt and preferred stock. For short-term debt, I utilized the most recent rate as reported in the response to CURB-90. The cost rate for post-1970s ITCs is calculated based on the overall cost of capital, excluding the ITCs. For common equity, I am recommending a cost rate of 8.85%.

Q. How did you develop your recommended cost of equity?

A. The KCC has traditionally relied upon the Discounted Cash Flow Model ("DCF") as the primary mechanism to determine cost of equity for a regulated utility. Therefore, in determining an appropriate return on equity for Westar, I have relied primarily upon the DCF model. The DCF method is based on the following formula:

$$\text{Return on Equity} = \frac{D_1}{P_0} + g$$

where "D_1" is the expected dividend, "P_0" is the current stock price, and "g" is the expected growth in dividends.

The DCF methodology is generally applied to a comparable group of investments, usually to a group of companies that provide the same utility service as the utility service for which rates are being set. In order to determine the cost of equity for Westar, I used the same comparable group as that selected by the Company for its analysis.

To determine an appropriate dividend yield for comparable companies -- i.e., the expected dividend divided by the current price -- I calculated the dividend yield of each of the comparable companies based on the average stock price of each company over a recent fifteen-day period. This is the same methodology used by Westar's witness, Mark Ruelle. The use of a dividend yield using a multi-day average price mitigates the effect of stock price volatility for any given day. Based on the average stock prices over a recent fifteen-day period, I determined an average dividend yield for the comparable group of 4.12%, as shown in Schedule ACC-5. I increased my recommended dividend yield by one-half of my recommended growth rate, as determined below, to reflect the fact that the DCF model is prospective and dividend yields may grow over the next year. Increasing the dividend yield by one-half of the prospective growth rate is commonly referred to as the "half year convention."

Q. How did you determine an appropriate growth rate?

A. The actual growth rate used in the DCF analysis is the dividend growth rate. In spite of the fact that the model is based on dividend growth, it is not uncommon for analysts to examine several growth factors, including growth in earnings, dividends, and book value.

Various growth rates for the companies within my comparable group are shown in

Schedule ACC-6 and averages are summarized below:

Past 5 Years - Earnings	5.67%
Past 5 Years - Dividends	4.72%
Past 5 Years - Book Value	4.72%
Past 10 Years - Earnings	(0.07%)
Past 10 Years - Dividends	(1.29%)
Past 10 Years - Book Value	3.00%
Estimated Next 5 Years - Earnings	6.22%
Estimated Next 5 Years - Dividends	4.94%
Estimated Next 5 Years - Book Value	3.72%

Q. Why do you believe that it is reasonable to examine historic growth rates, as well as projected growth rates, when evaluating a utility's cost of equity?

A. I believe that the KCC should consider historic growth rates because security analysts are notoriously optimistic in forecasting future growth, especially in earnings. At least part of this problem in the past has been the fact that firms that traditionally sell securities are the same firms that provide investors with research on these securities, including forecasts of earnings growth. This results in a conflict of interest, since it has been in the best interest of securities firms to provide optimistic earnings forecasts in the hope of selling more stock.

Therefore, state regulatory commissions should cautiously analyze projected earnings growth forecasts proposed by utilities.

Q. Based upon your review, what growth rate do you recommend the KCC utilize in the DCF calculation?

A. Based on my review of this data, I believe that the KCC should utilize a growth rate of no greater than 5.5%. This recommended growth rate is above the projected five-year growth rates in dividends and book value, per Value Line. Moreover, my recommended growth rate is higher than the actual historic average growth rates over the past five in dividends or book value, and higher than the average growth rates over the past ten years in earnings, dividends, or book value. My recommendation is also close to the historic five-year earnings growth rate. While my recommended growth rate is below the five-year historic or projected earnings growth rate, regulators should view projected growth rates cautiously because of the tendency of firms to be overly optimistic.

Q. What cost of equity is produced by the DCF methodology?

A. My analysis indicates a cost of equity using the DCF methodology of 9.73%, as shown below and as also shown on Schedule ACC-4:

Dividend Yield	4.12%
Growth in Dividend Yield (1/2 X 5.50% X 4.12%)	0.11%
Expected Growth	5.50%
Total	9.73%

Q. Did you also calculate a cost of equity based on the CAPM methodology?

A. Yes, I did.

Q. Please provide a brief description of the CAPM methodology.

A. The CAPM methodology is based on the following formula:

Cost of Equity = Risk Free Rate + Beta (Risk Premium)

or

$$\text{Cost of Equity} = R_f + B(R_m - R_f)$$

The CAPM methodology assumes that the cost of equity is equal to a risk-free rate, plus some market-adjusted risk premium. The risk premium is adjusted by Beta, which is a measure of the extent to which an investor can diversify his market risk. The ability to diversify market risk is a measure of the extent to which a particular stock's price changes relative to changes in the overall stock market. Thus, a Beta of 1.00 means that changes in the price of a particular stock can be fully explained by changes in the overall market. A stock with a Beta of 0.60 will exhibit price changes that are only 60% as great as the price changes experienced by the overall market. Traditionally, utility stocks have been less volatile than the overall market, i.e., their stock prices do not fluctuate as significantly as the market as a whole, and therefore their Betas generally have been less than 1.0.

Q. How did you calculate the cost of equity using the CAPM?

A. My CAPM analysis is shown in Schedule ACC-7. First, I used a risk-free rate of 3.06% for the yield on long-term U.S. Government bonds, which was the rate at December 21, 2011, per the Statistical Release by the Federal Reserve Board. Over the past year, this rate has ranged from 2.76% to 4.76%. In addition, I used the average Beta for the proxy group. This resulted in an average Beta of 0.71, as shown in Schedule ACC-8. Finally, since I am using a long-term U.S. Government bond rate as the risk-free rate, the appropriate risk premium to use is the historic risk premium of stocks over the rates for long-term government bonds. According to the *Ibbotson SBBI: 2011 Valuation Yearbook, Market Results for Stocks, Bonds, Bills, and Inflation*, the risk premium using geometric mean returns is 4.4%.

Q. What is the difference between a geometric and an arithmetic mean return?

A. An arithmetic mean is a simple average of each year's percentage return. A geometric mean takes compounding into effect. As a result, the arithmetic mean overstates the historic return to investors. For example, suppose an investor starts with $100. In year 1, he makes 100% or $100. He now has $200. In year 2, he loses 50%, or $100. He is now back to $100.

The arithmetic mean of these transactions is 100% - 50% or 50%/ 2 = 25% per year. The geometric mean of these transactions is 0%. In this simple example, it is clear that the geometric mean more appropriately reflects the real return to the investor, who started with

$100 and who still has $100 two years later. The arithmetic mean suggests that the investor should have $156.25 after two years ($100 X 1.25 X 1.25), when in fact the investor actually has considerably less. Therefore, a geometric mean return is a more appropriate measure of the real return to an investor, if it is used as I am using it here, i.e., to develop an historic relationship between long-term risk free rates and market risk premiums. Some utilities have criticized me in the past for using a geometric, rather than an arithmetic mean return, arguing that the arithmetic mean should be used when estimating future returns. However, in my case, I am not using the mean to develop an expected outcome, I am simply using the mean return to develop an historic relationship between long-term U.S. Government bond returns and equity returns. Therefore, the geometric mean is the appropriate measure, as illustrated in the above example.

Q. What is the Company's cost of equity using a CAPM approach?

A. Given a long-term risk-free rate of 3.06%, a Beta of 0.71, and a risk premium of 4.4%, the CAPM methodology produces a cost of equity of 6.18%, as shown on Schedule ACC-7.

Risk Free Rate + Beta (Risk Premium) = Cost of Equity

3.06% + (0.71 X 4.4%) = 6.18%

Q. Based on your analysis of the DCF and CAPM results, what cost of equity are you recommending in this case?

A. The DCF methodology and the CAPM methodology suggest that a return on equity of 6.18% to 9.73% would be appropriate. Since I recognize that the Commission has generally relied primarily upon the DCF, I have weighted my results with a 75% weighting for the DCF methodology and a 25% weighting for the CAPM methodology. This results in a cost of equity of 8.85%, as shown below:

DCF Result	9.73% X 75% =	7.30%
CAPM	6.18% X 25% =	1.55%
Total		8.85%

Q. Please comment on the fact that your CAPM result is lower than the Company's cost of debt.

A. Admittedly, this is an unusual result. However, the low CAPM return is the result of the fact that current interest rates are very low relative to historic levels, while the Company's cost of debt is based on an embedded cost that does not reflect current marginal rates. As shown in the Company's filing at Section 7, Schedule 7-C, Westar did not issue any long-term debt in 2010 or 2011. Westar's embedded cost of debt includes debt that was issued as far back as 1994. Therefore, one must be careful about comparing the cost of the embedded debt included in the Company's capital structure and the marginal costs for issuing new debt. While the CAPM model reflects 30-year Treasury debt (adjusted for the historic equity to debt risk premium) and not corporate debt, one generally assumes that changes in the cost of government debt is proportional to the changes in the cost of corporate debt over time.

Q. Why is your recommendation lower than the cost of equity recommended by Mr. Ruelle?

A. My recommendation is lower than Mr. Ruelle's primarily because he used unrealistic growth projections in his DCF analysis. Mr. Ruelle ignored historic growth rates and instead relied solely upon optimistic forecasts of earnings growth. Moreover, Mr. Ruelle also included a flotation cost adjustment by adjusting all stock prices by 5%. It is my understanding that the KCC has not traditionally made a flotation cost adjustment. However, even if just an adjustment was appropriate, the 5% adjustment made by Westar is excessive, in that it was applied to the stock prices of each company in the comparable group. The effect of this adjustment is that Westar applied it to all equity in the capital structure, instead of just to incremental equity issued by Westar since the last case. The impact of this adjustment is an increase to Westar's cost of equity of approximately 25 basis points. Finally, Mr. Ruelle did not examine the CAPM methodology and therefore his analysis is based solely on the DCF model.

Q. Do you agree with Mr. Ruelle's statement on page 84 of his testimony that regulatory risk is at the forefront of investors' concerns?

A. I believe that "regulatory risk" is one, of many, factors that influences investors' expectations. However, it should be noted that investors, by definition, would rather have lower risk than higher risk, just as they would rather have higher returns, than lower returns.

All other things being equal, investors will favor stocks with relatively low risk and high returns – that is no surprise. The role of the KCC is to balance the desire of investors for low risk and high returns with the needs of ratepayers, who have a need for reliable utility service at a reasonable price. Moreover, as noted earlier, the risk to investors of investing in Kansas' utilities has declined over the past few years, as more and more risk has been transferred from shareholders to ratepayers through the implementation of surcharge mechanisms, and other cost deferral mechanisms, that guarantee cost recovery for investors. Mechanisms such as the RECA, ECRR, EER, PTS, TDS, pension and OPEB trackers, storm damage deferrals, and others have continuously lowered the risk assumed by investors. It is time that the KCC adopt a return on equity that realistically reflects these reduced risks.

Q. What is the overall cost of capital that you are recommending for Westar?

A. As shown on Schedule ACC-2, I am recommending an overall cost of capital for Westar of 7.54%.

	Percent	Cost	Weighted Cost
Common Equity	50.04%	8.85%	4.43%
Long Term Debt	44.66%	6.65%	2.97%
Preferred Stock	0.38%	4.55%	0.02%
Short-Term Debt	3.99%	1.40%	0.06%
Post 1970 ITCs	1.93%	7.54%	0.07%
Total			7.54%[3]

3 Does not add to 100% due to rounding.

VI. RATE BASE ISSUES

Q. What test year did the Company utilize to develop its rate base claim in this proceeding?

A. The Company selected the test year ending March 31, 2011.

A. Utility Plant-in-Service

Q. How did the Company develop its utility plant-in-service claim in this case?

A. Westar began with its utility plant-in-service balance at March 31, 2011. It then made several pro forma adjustments to include CWIP in its plant-in-service claim and to eliminate certain investments, such as costs that it proposes to recover through the ECRR, investments related to transmission operations, and a small portion of its headquarters facility that is not providing service to regulated ratepayers.

Q. Are you recommending any adjustment to the Company's claim for utility plant-in-service?

A. Yes, I am recommending two adjustments, relating to ECRR-related investments and to CWIP.

Q. Please discuss your first adjustment relating to the ECRR.

A. As described by the Company on pages 3-5 of Mr. Rohlfs' Direct Testimony, the KCC previously approved an ECRR for Westar. This rider was intended to permit the Company, between base rate cases, to recover a return on certain investments in environmental projects, along with the associated depreciation expense. It is my understanding that the Company files an ECRR rate schedule with the KCC on March 31st of each year, requesting an ECRR surcharge related to environmental projects. Staff files its Report and Recommendations by May 1st, other parties file their comments by May 15th, and the KCC issues its Order by May 29th of each year. In its base rate filing in this case, Westar has eliminated all environmental projects associated with the ECRR from its rate base claim. Therefore, it has reduced its utility plant-in-service, CWIP, and accumulated depreciation to reflect the transfer of these projects from base rates to the ECRR. It also eliminated depreciation expense related to the associated projects. My understanding is that the ECRR does not include operating expenses associated with environmental projects, and therefore no operating and maintenance expense adjustments were necessary.

Q. Do you agree with Westar's proposal to continue to recover these costs through the ECRR?

A. No, I do not. The ECRR was initially approved in Docket No. 05-WSEE-981-RTS ("981 Proceeding"). In that case, Westar proposed that the costs being recovered between base rate cases be rolled into base rates with each base rate case. CURB initially was opposed to the implementation of an ECRR because of the fact that this surcharge shifts the risk of cost recovery between base rate cases from shareholders to ratepayers. Thus, ratepayers are paying for these environmental upgrades sooner with the ECRR than they would if cost recovery was delayed until a new base rate case was filed. The Commission adopted Westar's proposed ECRR, with two modifications as proposed by Staff. The mechanism adopted by the KCC included the provision that costs would be rolled into base rates each time the Company filed a base rate case, and the ECRR mechanism would effectively be reset to zero. Now, the Company is proposing to make a material change to the ECRR and to continue to recover costs through that mechanism instead of rolling them into base rates.

Q. Did Westar previously make a similar request to continue to recover these costs through the ECRR?

A. Yes, it did. In Docket No. 08-WSEE-849-TAR ("849 Proceeding"), Westar asked for the elimination of this requirement and for authorization to continue recovery of these environmental costs through a surcharge mechanism. Westar's request in that case was opposed by CURB and was denied by the KCC. As noted by CURB in its comments in that docket,

> The overwhelming weight of the evidence in the 981 Docket indicates that everyone understood that all of the expenditures placed into the ECRR after the company's most recent rate case would be removed from the ECRR and placed into base rates in the next rate case. Thus, the company would have the benefit of receiving revenues through the ECRR for the cost of the projects between rate cases, but would bear the normal risk of recovery of its approved revenue requirement after each subsequent rate case. This arrangement provides at least two protections for the ratepayers: (1) rate case review is more thorough than the summary review of requests for tariff and surcharge changes, and provides other parties the opportunity for meaningful review of the expenditures, as well; and (2) it properly places the risk on the company for revenue recovery over the long term.[4]

4 CURB Comments in Docket No. 08-WSEE-849-TAR, May 9, 2008, page 4.

The KCC concurred, finding that these costs should be included in base rates in the next rate case. In Docket No. 08-WSEE-1041-RTS ("1041 Proceeding"), Westar once again proposed that these costs continue to be recovered through the ECRR, contrary to the Commission's finding the in 849 Proceeding. The 1041 Proceeding was resolved by a Stipulation, which required Westar to roll these environmental costs into base rates, consistent with the initial KCC Order that resulted in implementation of the ECRR. Now, however, Westar is once again proposing to continue to recover these costs through the ECRR, contrary to the KCC's Order in the 981 Proceeding and contrary to the Settlement Agreement in the 1041 Proceeding.

Q. Are you recommending that the environmental costs previously recovered through a surcharge be included in base rates?

A. Yes, I am. Since the purpose of the ECRR is to provide for recovery of certain environmental project costs between base rate case filings, there is no need to continue the surcharge once new base rates are established by the KCC. Accordingly, I recommend that the environmental costs eliminated from the Company's claim be added back for recovery through base rates. At Schedule ACC-10, I have made an adjustment to increase the Company's utility plant-in-service claim to include the environmental utility plant-in-service that is currently being recovered through the ECRR. On this same schedule, I have also reflected an adjustment to increase the Company's reserve for depreciation to include the accumulated depreciation associated with these projects.

Q. Why is it more appropriate to recover these costs through base rates?

A. It is appropriate to recover these costs through base rates because that is the ratemaking mechanism used for a utility's capital investments. Because of the large investment in environmental projects that is required over a relatively short period of time, the KCC gave utilities the opportunity to recover the return associated with these environmental investments, as well as the associated depreciation expense, between base rate cases. But the ECRR was intended to supplement, not replace, the traditional ratemaking process. Providing for guaranteed recovery of these capital costs over their lives would effectively remove all shareholder risk. The ECRR is intended to assist the Company in meeting certain financial requirements during a period of heavy construction, but it should not result in the total elimination of all shareholder risk, or the transfer of the entire risk to ratepayers.

Westar argues that these costs should be separately identified so that ratepayers have a better understanding of the environmental costs resulting from regulations over which the utility has limited control. However, this political motivation ignores the fact that utilities have always incurred some level of environmental compliance costs, and that these costs have traditionally been recovered through base rates. For these reasons, the KCC should reject the Company's proposal to recover these costs indefinitely through the ECRR. Instead, the KCC should roll these costs into base rates when the Company has a periodic rate case. As noted by CURB in its comments in the 849 Proceeding, "[r]emoving environmental costs from base rates and placing them into the ECRR is contrary to the principle that the utility should be afforded the opportunity, not a guarantee, to recover its investment."[5]

Q. Do you have any comments about the Company's quantification of the rate base impact of this adjustment?

A. Yes, I do. In response to KCC-179, Westar indicated that it had inadvertently reflected the wrong number for accumulated depreciation in its rate base adjustment relating to the ECRR. Since I am recommending that the Company's adjustment to recover this plant through the ECRR be reversed, I have utilized the adjustment as quantified by Westar to develop my recommended rate base adjustment. However, if the KCC accepts Westar's claim and orders that these costs continue to be recovered through the ECRR, then it would be necessary to correct the accumulated depreciation reflected in Westar's rate base adjustment, consistent with the response to KCC-179.

B. Construction Work In Progress

Q. What is CWIP?

A. CWIP is plant that is under construction but which has not yet been completed and placed into service. Once the plant is completed and serving customers, then the plant is booked to utility plant-in-service and the utility begins to take depreciation expense on the plant.

5 Id., page 6.

Q. What CWIP did the Company include in its rate base claim in this case?

A. The Company's rate base claim includes all CWIP at March 31, 2011, except for CWIP that is being recovered through the ECRR.

Q. Do you believe that CWIP is an appropriate rate base element?

A. No, I do not believe that CWIP is an appropriate rate base element. CWIP does not represent facilities that are used or useful in the provision of utility service. In addition, including this plant in rate base violates the regulatory principle of intergenerational equity by requiring current ratepayers to pay a return on plant that is not providing them with utility service and which may never provide current ratepayers with utility service. However, I understand that the inclusion of CWIP in rate base is governed by statute.[6]

K.S.A. 66-128 provides for the KCC to determine the value of the property included in rate base. The statute generally requires that "property of any public utility which has not been completed and dedicated to commercial service shall not be deemed to be used and required to be used in the public utility's service to the public."

However, the statute also provides that certain property "shall be deemed to be completed and dedicated to commercial service" under certain circumstances. Specifically, K.S.A. 66-128(b)(2) provides that,

> Any public utility property described in subsection (b)(1) shall be deemed to be completed and dedicated to commercial service if: (A) construction of the property will be commenced and completed in one year or less; (B) the

[6] I am not an attorney and my discussion of the CWIP statute is not intended as a legal interpretation of that statute, but rather provides my understanding of the statute from a ratemaking perspective.

> property is an electric generation facility that converts wind, solar, biomass, landfill gas or any other renewable source of energy: (C) the property is an electric generation facility or addition to an electric generation facility, which facility or addition to a facility is placed in service on or after January 1, 2001; or (D) the property is an electric transmission line, including all towers, poles and other necessary appurtenances to such lines, which will be connected to an electric generation facility.

Q. Does the CWIP included by Westar in its rate base claim meet the criteria outlined in the statute?

A. While I am not an attorney, I believe that the CWIP associated with generation projects falls into the categories of CWIP that the statute requires the KCC to include in rate base. In addition, the Company is currently authorized to recover $145.4 million of CWIP associated with environmental projects through its ECRR rate. Since I am recommending that these environmental projects should now be recovered through base rates, it is necessary to include the associated CWIP in rate base.

With regard to other CWIP projects, it is unclear from the Company's filing whether these projects meet the requirements of the statute that public utility property "will be deemed to be completed and dedicated to commercial service" if certain conditions are met, one of which is that "construction of the property will be commenced and completed in one year or less."[7]

Q. Did the Company provide any information in its filing explaining why it believes that it should be permitted to include all CWIP in rate base?

A. No. While Mr. Kongs stated on page 3 of his testimony that "[t]he non-generation projects covered by this adjustment will be placed in service to benefit customers within 12 months," the Company did not provide any supporting documentation in its workpapers to demonstrate that each of these projects meets the criteria outlined in the statute. The Company appears to believe that any CWIP project that was included in CWIP at the end of the test year should be included in its rate base. This is in direct conflict with the statute, which principally states that "property of any public utility which has not been completed and dedicated to commercial service shall not be deemed to be used and required to be used in the public utility's service to the public."[8] In order to be included in rate base, the non-generation CWIP should be "commenced and completed in one year or less".[9]

Westar did not provide an estimated in-service date for projects included in its CWIP claim in either its filing or in its workpapers. Nor did Westar provide a starting date for each of these projects. Westar did provide information about starting and completion dates in its response to KCC-292. However, this response does not support the Company's CWIP claim.

Q. Why do you believe that the Company's response to KCC-292 fails to support its CWIP claim?

A. The response to KCC-292 shows that the Company included in its CWIP claim uncompleted projects that started as far back as August 2007. These projects will obviously not

7 K.S.A. 66-128(b)(2)(A).
8 K.S.A. 66-128(b)(1).
9 K.S.A. 66-128(b)(2).

commence and be completed within one year. The Company also included many projects that it reported as complete prior to the start of the test year in this case. Moreover, Westar's claim includes many small projects, for example, several claims for $79.10 and for $62.85. It is not clear that these costs should have been capitalized at all, given the low dollar amounts involved.

In addition, the inclusion of projects that are not yet complete is speculative. These projects do not represent known and measurable changes to test year results. We have no way of knowing if, in fact, these projects will go into service within the one-year time frame established in the legislation or if they will ever go into utility service. The CWIP legislation requires projects to commence and be completed within one year. Westar has clearly not demonstrated that its non-generation related CWIP claim meets the one-year requirement contained in the statute.

Q. **Do you have any other comments regarding Westar's CWIP claim?**

A. Yes, I do. Since K.S.A. 66-128 was enacted, it has been my experience that Kansas utilities have pushed the envelope of reasonableness with regard to CWIP claims. Companies seem to believe that all CWIP claims must automatically be approved by the KCC. The qualifying provisions of the CWIP statute are routinely ignored by Kansas utilities, which make no effort to demonstrate that their CWIP claims meet the provisions of the statute. This is true of Westar in this case.

Q. What do you recommend?

A. Since the Kansas legislature mandates that utilities be permitted to include generation-related CWIP in its rate base claims, I have accepted the generation-related CWIP included in the Company's filing. However, I have eliminated all non-generation related CWIP from the Company's rate base. My adjustment is shown in Schedule ACC-11.

Q. How have you treated CWIP relating to the Company's ECRR projects?

A. Based on my reading of the statute, it appears that the KCC is required to include in rate base CWIP claims relating to these environmental upgrades. Since I am recommending rolling back the ECRR project costs into base rates, it is necessary to adjust the Company's rate base claim to reflect the CWIP that is currently being recovered through the ECRR. This adjustment is also shown at Schedule ACC-11.

C. Fossil Fuel Inventory

Q. How did the Company determine its claim for fossil fuel inventory?

A. The Company utilized a 13-month average balance for its fuel oil inventory. Its claim for coal inventory was based on a study performed by Black and Veatch, as discussed on page 18 of Mr. Sterbenz's Direct Testimony. In addition, the Company included an adjustment to reflect the reduction in inventory relating to a sale of #6 fuel oil, which resulted in a financial gain. Westar is proposing to allocate 37.5% of this gain to ratepayers, and to amortize the gain over a three-year period. Westar reduced rate base to reflect the regulatory liability relating to the gain that will be credited to ratepayers over a three-year period.

Q. Are you recommending any adjustments to the Company's claim for fossil fuel inventory?

A. Yes, I am recommending three adjustments relating to coal inventory, fuel oil balances, and allocation of the gain on sale of fuel oil.

Q. Please discuss your first adjustment.

A. I recommend basing the coal inventory level on the average balance for the thirteen months ending March 2011. This methodology is consistent with the methodology used by Westar for other types of fuel inventory. While the Company's coal inventory studies may be helpful from a planning perspective, using such targets to establish utility rates is speculative and may require ratepayers to pay for coal inventory that is never actually used to provide regulated utility service. Therefore, I recommend that the KCC utilize a 13-month average to determine the Company's pro forma coal inventory. My adjustment is shown in Schedule ACC-12. My adjustment results in a pro forma inventory level of $67,914,333. This recommendation appears reasonable when one examines actual inventory levels since the end of the test year. For example, coal inventory at September 31, 2011, was $64.7 million, according to the response to KCC-305.

Q. Please describe your adjustment to the Company's claim for fuel oil inventory.

A. In the response to KCC-307, Westar indicated that it had made two errors in its calculation of the test year average balance for fuel oil inventory. Specifically, the Company had failed to include amounts for #2 fuel oil in its calculation. In addition, Westar had made a computational error when calculating the adjustment relating to the sale of #6 fuel oil and had under-estimated the quantity of fuel oil to be sold. The net effect of these two adjustments was to increase the Company's claim for fossil fuel inventory by $1,171,467. At Schedule ACC-12, I have made an adjustment to correct for these two errors.

Q. Please describe your adjustment relating to the gain on the sale of the #6 fuel oil.

A. The Company sold #6 fuel oil inventory in both 2008 and 2011. In its filing, the Company reported total gains of $8,491,816, and it proposed to allocate these gains 37.5% to ratepayers and 62.5% to shareholders. As described in the testimony of Mr. Kongs beginning on page 8, the Company's proposed allocation is based on its interpretation of five guidelines identified by the Court of Appeals in Kansas Power & Light Co. v. KCC, 5 Kan. App. 2d 514 (1980). These guidelines are 1) risk of loss of investment capital, 2) contribution by customers to the value of the property, 3) financial integrity of the company, 4) increases in value due to inflation, and 5) increases in the value of the property due to improvements in the neighborhood. The Company used a 50%/50% allocation for guidelines (1), (3) and (4), and allocated 100% of the gain to shareholders based on guideline (2). Westar did not utilize guideline (5) in its allocation. As shown on page 11 of Mr. Kongs' testimony, Westar's methodology resulted in 62.5% of the gain being allocated to shareholders. I disagree with the Company's proposed allocation, and instead recommend allocating 100% of the gain on sale to ratepayers.

Q. Why do you believe that it is reasonable to allocate 100% of the gain on sale to ratepayers?

A. The risk of carrying this fuel inventory fell squarely on the shoulders of ratepayers. Moreover, ratepayers have also paid for the storage facilities at the generation sites that enabled this fuel to be retained by Westar. When the guidelines are considered in view of these two facts, I believe it is clear that ratepayers should receive 100% of any gain associated with the sale of this fossil fuel.

With regard to guideline (1), fuel oil in inventory is a component of the Company's rate base, while fuel oil that is used in the operation of the Company's generation facilities is a component of its RECA. Since ratepayers are therefore responsible for both the fuel oil expense and for providing a return on fuel oil inventory, shareholders were not at risk for loss of investment capital associated with this fuel. With regard to guideline (2), the Company concluded that ratepayers did not make any contribution to the maintenance and upkeep of this asset, since fuel oil "is a commodity and not property requiring maintenance and upkeep...".[10] Therefore, the Company assigned shareholders 100% of the gain based on this guideline. However, since the #6 fuel oil has been stored in large storage tanks that are in

10 Testimony of Mr. Kongs, page 9, line 29 – page 10, line 1.

rate base and are therefore being paid for by ratepayers, it is the ratepayers who should receive all of the benefit resulting from this guideline.

With regard to guideline (3), allocation of this gain will not impact the financial integrity of the utility, its stock price, or its ability to attract capital. Consequently, the Company used a 50%/50% allocation for this guideline. However, since the financial health of the utility will not be impacted by this gain, it should be allocated to ratepayers, who are being asked to pay $90 million in additional rates as a result of this case. Finally, regarding guideline (4), I agree with the Company that the value of the #6 fuel oil is determined by supply and demand, and not by inflation. However, I disagree with the Company that this guideline suggests a 50%/50% allocation is appropriate. Instead, this guideline should be eliminated from consideration (as guideline (5) was by the Company) or the gain should be allocated 100% to ratepayers, for the reason stated above.

Q. Did Westar have any choice but to sell a portion of its #6 fuel oil?

A. No, according to the response to CURB-116, the sale of #6 fuel oil was the result of the Regional Haze Agreement with the Environmental Protection Agency ("EPA") and "was only made to comply with new requirements prescribed by the EPA." Thus, these sales were not the result of strategic decisions by Company management, but were required to bring inventory down to permissible levels.

Q. Is there another reason why you believe that ratepayers should receive 100% of the gain from these sales?

A. Yes, there is. Ratepayers are currently faced with significantly greater risks than they were in 1980 when these guidelines were established, while shareholders now have several additional surcharge mechanisms available to flow through costs to ratepayers. Over the past several years, Westar has implemented the RECA, ECRR, EER, TDC, PTS surcharges that provide guaranteed, dollar-for-dollar recovery of a substantial portion of the Company's revenue requirement. Westar has also won approval for pension and OBEP trackers and for deferrals of storm damage costs and other costs that ensure recovery from ratepayers of costs that in the past would likely have been borne by shareholders. In addition, the Company has a pre-approval process available by which it can obtain pre-approval of large generation projects and purchased power agreements, including new purchased power agreements relating to wind generation that will come on-line in 2012. Westar has consistently argued that it requires these surcharges and pre-approval processes in order to mitigate its risk. In this environment, when costs are continually being shifted from shareholders to ratepayers, it is only fair that ratepayers receive the benefit from occasional gains, such as the gain on sale of #6 fuel oil. This is especially true in this case, since the allocation of 100% of this gain to ratepayers is also supported by a review of the factors raised in the Kansas City Power & Light case referenced above. Accordingly, I recommend allocating 100% of the gain from the sale of the #6 fuel oil to ratepayers.

Q. How did you quantify your adjustment?

A. In its response to KCC-346, Westar revised its calculation of the total gain on the sale of this fuel oil. According to that response, the after-tax gain was $7,953,254. On Schedule ACC-13, I have made an adjustment to reduce rate base by this amount.

D. Summary of Rate Base Adjustments

Q What is the net impact of the rate base adjustments recommended by CURB?

A. My rate base adjustments will result in a pro forma rate base of $3,749,762,254, as summarized on Schedule ACC-9. This pro forma rate base amount includes adjustments of $350,490,175 to the rate base proposed by Westar. My recommended rate base is greater than Westar's rate base claim, due to the fact that I have included in rate base significant plant that is currently being recovered through the ECRR.

VII. OPERATING INCOME ISSUES

A. Pro Forma Revenue

Q. Are you recommending any adjustments to the Company's claim for pro forma revenue?

A. I am not recommending any adjustment to the Company's claim for pro forma revenue. However, I am recommending a change to the Company's proposed ratemaking treatment of firm wholesale firm sales revenue. This revenue is currently reflected in the ACA component of the RECA. As discussed by Mr. Rohlfs starting at page 5 of his Direct

Testimony, Westar is proposing to move the non-fuel revenue from these sales from the ACA component of the RECA to base rates. The effect of this change is that there would no longer be a true-up for wholesale firm non-fuel revenue. While I have accepted the Company's adjustment to roll $20,361,658 of this revenue into base rates, I recommend that amounts above or below this base rate level continue to be subject to a true-up through the ACA.

Q. What is the basis for your recommendation?

A. Westar has continued to acquire new wholesale firm customers and/or to expand its service to existing customers.[11] In addition, since revenues from these wholesale customers are based on formula rates, these revenues will change as the Company's costs change. Assuming that costs generally increase, non-fuel wholesale firm revenue would also be expected to increase over time. Therefore, the test year is not necessarily representative of a prospective level of firm wholesale non-fuel revenue. Accordingly, I recommend that the KCC continue to utilize the ACA to flow through amounts above or below the amount in base rates it approves in this case.

B. <u>Short-Term Incentive Compensation Expense</u>

Q. Please describe the Company's incentive compensation program.

A. The Company has several incentive compensation plans for its non-union employees. Most

11 See response to KCC-399.

employees are covered under the Short-Term Incentive Plan ("STI"). This plan covers all non-bargaining employees in pay grades A through V. The plan provides for the establishment of incentive pools. The percentage of base salary included in the incentive target increases based on the pay grade. Thus, the incentive target is 25% of the base salary for pay grade A, declining to only 5% of salary for pay grades H-V. In 2010 and 2011, there were four areas of performance measurement: financial, operational, customer satisfaction, and safety. Westar also offers a Bulk Power Marketing Incentive Plan and a Generation Construction Incentive Plan.

Q. How much is included in the Company's pro forma expense claim relating to short-term incentive compensation plans?

A. As shown in the Company's response to CURB-16, Westar has included $9,763,030 in its test year claim associated with short-term incentives.

Q. Do financial results have a significant impact on the short-term incentives paid by Westar?

A. Yes, they do. In 2011 and 2010, the short-term incentive plans included a financial component of 50%. The financial component is measured by comparing Westar Total Shareholder Return ("TSR") to the TSR of other electric utilities in a peer group of companies. Thus, not only does Westar's financial performance have a direct impact on the short-term incentives paid to employees, but the financial performance of other utilities has a direct impact as well. In addition, each of the four criteria (financial, operational, customer satisfaction, and safety) also have a maximum payout percentage. For three of the four criteria, the maximum payout percentage is 150% of the target award. For the financial criteria, the maximum payout percentage is 200%. Thus, the financial benchmark has a disproportionately larger impact on the overall incentive payments than do the other three benchmarks.

Q. Is it appropriate to have ratepayers fund 100% of these types of incentive programs?

A. No, it is not. Providing employees with a direct financial interest in the profitability of the Company is an objective that would benefit shareholders, but it does not benefit ratepayers. Incentive compensation awards that are based on earnings criteria may violate the principle that a utility should provide safe and reliable utility service at the lowest possible cost. This is because these plans require ratepayers to pay higher compensation costs as a consequence of higher corporate earnings, generating an upward spiral in rates that does not directly benefit ratepayers, but does directly benefit shareholders, as well as management personnel responsible for establishing such programs.

Incentive compensation plans tied to corporate performance result in greater enrichment of company personnel as a company's earnings reach or exceed targets that are predetermined by management. It should be noted that it is the job of regulators, not the shareholders or company management, to determine what constitutes a just and reasonable rate of return award to shareholders in a regulated environment. Regulators make such a determination by establishing a reasonable rate of return award on rate base in a base rate case proceeding.

Allowing a utility to charge for additional return that is then distributed to employees as part of a plan devised to divide extraordinary profits violates all sense of fairness to the ratepayers of the regulated entity. It is certain to result in burdensome and unwarranted rates for its ratepayers, and also violates the principles of sound utility regulation, particularly with regard to the requirement of "just and reasonable" utility rates.

Q. What would be the appropriate response by the KCC if the earnings of Westar were in excess of its authorized rate of return?

A. If the KCC determined that these excess earnings were expected to continue, the appropriate response would be to initiate a rate investigation, and, if appropriate, to reduce the utility's rates.

Q. Are Westar employees well compensated, separate and apart from these employee incentive plans?

A. Yes, they are. In spite of difficult economic times, the Company's non-union employees received a 2.00% increase in 2011 and a 3.65% increase in 2010. In fact, from 2006 through 2011, non-union employees received 8 payroll increases, totaling 27.81%, according to the response to CURB-8. Moreover, there is no indication that Westar is having difficulty attracting quality non-union employees to its workforce. Westar's salary and wage levels appear reasonable, even if the incentive compensation plans are not taken into account.

Q. Didn't the Company sponsor extensive testimony discussing the fact that its total compensation package is tied to industry benchmarks as determined in studies conducted by Mercer and Towers Watson?

A. Yes, it did. However, the use of industry benchmarks, which are widely used by utility companies to support their compensation policies, results in a spiraling of compensation costs as companies that are below the market median attempt to improve their positioning. These surveys compare the subject company's compensation to compensation in a range of other firms. Since most companies do not want to find themselves in the lower half of the benchmark group, companies that typically fall below the average raise their compensation – and hence the average of the benchmark companies increases. This sets off a chain of events that results in ever-increasing compensation levels. Thus, the KCC should be particularly wary of any compensation plans that are justified by means of comparison to benchmark studies.

Q. Given your concerns, are you recommending any adjustment to the Company's claim for its short-term incentive compensation plan costs?

A. Yes, since the STI is based on financial performance triggers tied to the financial performance of Westar and other companies, I recommend that the KCC limit recovery of the cost of this incentive compensation award program from ratepayers to 50%, and reflect a

50%/50% sharing between ratepayers and shareholders. This recommendation is based on the fact that 50% of the incentive award is directly tied to financial parameters. This recommendation will require the Board of Directors to establish incentive compensation plans that shareholders are willing to finance, at least in part. As long as ratepayers are required to pay 100% of the costs of these incentive plans, then there is no incentive for management to control these costs. This is especially true since the management of the Company and its stockholders are the primary beneficiaries of such plans. Therefore, I recommend that the KCC adjust the Company's claim for the STI incentive compensation costs to eliminate recovery of 50% of these costs. My adjustment is shown in Schedule ACC-15.

Q. Have you made an associated adjustment to the Company's payroll tax expense claim?

A. Yes, I have made an adjustment to eliminate the payroll taxes associated with my recommended adjustment relating to short-term incentive compensation costs. To quantify my payroll tax adjustment, I utilized the statutory social security and medicare tax rate of 7.65%. I then multiplied this rate by my recommended adjustment to the Company's short-term incentive compensation program costs. My payroll tax adjustment is shown in Schedule ACC-16.

C. <u>Restricted Share Unit ("RSU") Expense</u>

Q. What incentive plan is provided to officers and other top executives?

A. In place of short-term incentive compensation awards, officers and other executives participate in a Restricted Share Unit ("RSU") program. The RSU program provides for the issuance of common stock grants. According to Jerl Banning's Direct Testimony at page 21, 50% of the RSU grants made under the plan vest based on Westar's performance over a three-year period, while the remaining 50% vest after three years.

Q. How does Westar evaluate compensation for its executive officers?

A. Similar to the benchmarks established in the Mercer and Towers Watson studies discussed above for non-union employees, Westar also utilizes an analysis performed by Towers Watson that examines executive compensation for Westar's officers relative to compensation paid by other utilities, adjusted to reflect Westar's size as measured by revenues.

Q. What are the criteria for awarding of the RSUs?

A. The awards are based solely on financial criteria. Payouts are dependent upon Westar's TSR relative to the benchmark peer group. TSR is defined as the change in the company's stock price, plus any dividends paid during the year, divided by the beginning stock price. According to plan documents, 100% of the target award will be made if Westar is at or above the 50th percentile of the peer group.

Q. Do you have concerns about this methodology?

A. Yes, I do. As stated above, the use of studies that compare a utility's executive compensation with the median compensation levels at other companies results in a self-fulfilling prophecy as the companies that fall below the median increase compensation in an attempt to reach the 50% threshold. This puts further upward pressure on the median, resulting in higher and higher executive compensation payments and higher rates for regulated ratepayers. Moreover, basing executive compensation on amounts paid by other companies does not ensure that compensation will be tied to benchmarks that benefit Westar's ratepayers.

In addition to concerns about the use of a peer group, I have additional concerns about the use of TSR as the indicator on which these awards will be made. The RSU awards are completely driven by financial criteria. Higher common equity market prices and dividend increases provide substantial benefits to shareholders, but virtually no benefit to ratepayers, and it is inappropriate to tie utility rates to these benchmarks.

Q. What do you recommend?

A. Given the use of a purely financial benchmark for the RSU, as well as my concerns regarding the inappropriate use of a peer group to evaluate Westar's awards, I am recommending that the KCC eliminate 100% of RSU costs from the Company's regulated cost of service. My adjustment is shown in Schedule 17.

D. Deferred Benefit Expense

Q. Please describe the Company's claim relating to deferred benefit expense.

A. In KCC Docket No. 10-WSEE-135-ACT, Westar was authorized to defer the difference between its actual pension, OPEB, and other post-employment expense ("FAS 112") and the amounts being collected in rates. The KCC authorized Westar to begin this deferral at January 1, 2009. The Order approving the deferral also specified that costs would be amortized in Westar's rate case over a period not to exceed five years. Neither the deferral, nor any unamortized balances, are to be included in rate base.

In its filing, the Company claimed total deferral costs of $37.34 million, which is it proposing to amortize over three years, for an annual amortization expense of $12.45 million. The Company's deferral is composed of a Westar pension deferral of $43.9 million and a Wolf Creek Nuclear Operating Company ("WCNOC") pension deferral of $5.08 million, offset by over-recovery of FAS 106 and FAS 112 costs of $11.66 million.

Q. Are you recommending any adjustment to the Company's claim?

A. I am not recommending any adjustment to the total amount of the deferral, but I am recommending amortization of this deferral over five years instead of over the three-year period reflected in the Company's claim.

Q. What is the basis for your recommendation?

A. A five-year deferral is consistent with the guidance provided in KCC Docket No. 10-WSEE-

135-ACT with regard to the appropriate amortization period. That order expressly permitted amortization periods of up to five years. The use of a five-year amortization period will mitigate the impact of this deferral on the annual rates paid by Kansas customers. In addition, it is important to consider that in addition to this deferral, the Company is also seeking authorization to increase the pension expense included in rates from $10.67 million to $33.24 million, and to increase its WCNOC pension expense from $4.37 million to $8.41 million. Therefore, one would expect that future deferrals will be much smaller than those being claimed in this case, and could even result in refunds to ratepayers. I have not proposed any adjustment to the prospective pension costs being claimed by Westar. Given the significant increase in the prospective pension costs to be included in base rates, the magnitude of Westar's rate increase request in this case, and the fact that a five-year deferral is permissible pursuant to the Order in KCC Docket No. 10-WSEE-135-ACT, I recommend that the KCC adopt a five-year amortization period for deferred pension and OPEB costs. My adjustment is shown in Schedule ACC-18.

E. <u>Supplemental Executive Retirement Plan ("SERP") Expense</u>

Q. What are SERP plans?

A. SERP plans are non-qualified retirement plans for officers and other key executives that provide benefits that these individuals would have received under the company's other retirement plans, except for compensation and benefit limitations imposed by the Internal Revenue Service ("IRS"). These costs are supplemental retirement benefits that are in addition to the normal retirement programs provided by the Company. These supplemental programs generally exceed various limits imposed on retirement programs by the IRS and therefore are referred to as "non-qualified" plans. According to the Company's response to CURB-20, the Company has included costs associated with three SERP programs in its rate case claim: an executive salary continuation plan, a restoration plan, and the WCNOC SERP plan.

The majority of SERP costs being claimed by the Company relate to the executive salary continuation plan. This plan was terminated in 2001 but continues to provide benefits to 37 former employees and 2 current employees. Monthly benefits are provided as a life annuity. Westar's filing includes $1,566,677 relating to this plan.

The Company has also included $228,051 relating to a salary restoration plan that was established in April 2010 "by the Company solely for the purpose of providing benefits in excess of the limitations on benefits imposed by the Internal Revenue Code on qualified retirement plans for certain of its executive officers...." Westar's filing also includes $193,769 in SERP costs from WCNOC.

Q. Do you believe that these costs should be included in utility rates?

A. No, I do not. The officers of the Company are already well-compensated. Moreover, individuals that receive SERP benefits are also included in the normal retirement plans of the Company, so ratepayers are already paying substantial retirement-related costs for these individuals. If Westar's management wants to provide further retirement benefits to officers and select key employees, then shareholders, not ratepayers, should fund these excess benefits. Therefore, I recommend that the Commission disallow the Company's claim for SERP costs. My adjustment is shown in Schedule ACC-19.

F. <u>Smart Star Non-Labor Expense</u>

Q. What is the Smart Star program?

A. As described in the testimony of Mr. Ludwig beginning on page 10, the Smart Star program is a an initiative to provide smart grid meters to approximately 46,000 meter locations in Lawrence, Kansas. All customers in Lawrence will receive Advanced Metering Infrastructure ("AMI") meters. This large scale pilot program will allow Westar to test several new customer service options and will hopefully allow customers to exercise better control over their energy usage and the associated cost. The Smart Star program is expected to cost approximately $42 million, with about 50% of the cost being funded through a Department of Energy ("DOE") grant.

Q. How have costs for the Smart Star program been reflected in the Company's revenue requirement in this case?

A. Westar filed a request for an Accounting Authority Order ("AAO") on March 2, 2011 in Docket No. 11-WSEE-610-ACT, seeking authorization to defer certain program costs. Specifically, Westar sought authorization to 1) defer expenses associated with the project, 2) defer depreciation expense on assets used in the project, and 3) earn a return on the deferred investment at Westar's authorized rate of return. At the time of the filing of this rate case, that application was pending before the KCC. The Company's claim, as filed, included $732,332 of test year non-labor costs associated with the project. Mr. Rohlfs stated on page 9 of his Direct Testimony that if the KCC granted the Company's request for an accounting order, then the KCC should remove these test year costs from the Company's claim.

The KCC issued an order in Docket No. 11-WSEE-610-ACT on October 19, 2011. In that Order, the KCC authorized Westar to defer non-labor expenses, without carrying charges, associated with the project. The KCC also denied the Company's request to defer depreciation expense and carrying charges on the capital investment portion of the project. The KCC directed that any deferrals be subject to review in Westar's pending rate case.

Q. Did the Company supplement its direct testimony as a result of the KCC's Order?

A. Yes, it did. On November 23, 2011, Mr. Rohlfs filed Supplemental Testimony that addressed the KCC's Order. In that testimony, Mr. Rohlfs stated that the Company had incurred approximately $1.7 million of non-labor expenses associated with the Smart Star project through the third quarter of 2011, and that it expected to incur an additional $1.7 million of such costs through the end of 2012, for a total of $3.4 million. Mr. Rohlfs proposed to amortize these costs over a three-year period, for an annual amortization expense of approximately $1.1 million annually. Accordingly, Mr. Rohlfs indicated that the test year costs of $773,332 included in the Company's filing should be increased by $326,668.

Q. Do you agree with Mr. Rohlfs's proposal?

A. No, I do not. I am recommending two adjustments to Mr. Rohlfs's proposal. First, I am recommending that costs recovered in this base rate case be limited to the actual incurred costs of $1.7 million through October 2011. Mr. Rohlfs's proposal to include estimated costs through the end of 2012 would result in ratepayers paying for speculative costs that may never be incurred. The KCC has approved an accounting order permitting the non-labor Smart Star project expenses to be deferred, and therefore the Company has a mechanism in place to handle any additional expenses between base rate cases. In addition, I am recommending amortization of deferred costs over a period of five years, instead of over the three-year period proposed by Westar. My adjustment is shown in Schedule ACC-20.

Q. What is the basis for the five-year amortization period that you are recommending?

A. I am recommending a five-year period because the Smart Star program is intended to be a pilot that will determine how energy usage will be metered, and managed by customers for many years into the future. Therefore, it is appropriate to take a longer-term view of cost recovery for these costs. This program will provide benefits for an indefinite period of time. If the program is successful, it will likely change the delivery of usage information and the application of that information for a generation of utility customers. Moreover, even if the program is not successful, the information provided by the Smart Star pilot will enable Westar and other utilities to reevaluate potential long-term solutions for energy control, management and metering. Given the long-term nature of these benefits, I believe that a five-year amortization period is more reasonable than the three-year period recommended by Westar.

Q. In its Order in Docket No. 11-WSEE-610-ACT, did the KCC also direct the parties to propose a policy or practice for examining requests for accounting orders and proposals regarding the appropriate treatment of investments made by Westar between base rate cases?

A. Yes, it did. Specifically, the KCC stated in its Order that,

> The Commission directs its Staff, Westar and CURB to propose a policy or practice for accounting treatment of depreciation, carrying costs and recovery through traditional rate-making processes as compared to an EER, for expense items such as the Smart Star Lawrence project, and submit these proposals for the Commission's consideration in Westar's pending rate case, Docket No. 12-WSEE-112-RTS...

The Commission's directive was addressed in Mr. Rohlfs' Supplemental Testimony filed on November 23, 2011. In that Supplemental Testimony, Mr. Rohlfs stated that the Company is generally satisfied with the process used by the KCC to review requests for Accounting Orders. He noted on page 6 of his Supplemental Testimony that,

> While Westar would always prefer to have a ruling sooner than later, there was no particular urgency for a quicker order in the SmartStar Lawrence AAO docket. Also, unique circumstances in the docket caused the process to take longer than it otherwise might have.

Mr. Rohlfs did recommend that the KCC adopt a checklist of information that should be filed with any request for an AAO. In addition, he recommended that Staff conduct an upfront review shortly after the AAO application is filed and recommend a suspension period to the KCC.

Q. Do you agree with Mr. Rohlfs that the current process works relatively well?

A. Yes, I do. I do not believe that a change to the process for review and evaluation of AAO applications is necessary. Moreover, it might be inappropriate to adopt a more rigid process for review of AAO applications, given that these filings are, in essence, requests for extraordinary recovery of costs that the utility would be at risk for recovering under the traditional ratemaking mechanism. Thus, it is reasonable to provide the parties and the KCC with some flexibility in reviewing these applications.

I do support the checklist of items that Mr. Rohlfs proposed be filed along with the request for an AAO. The items outlined on pages 10-11 of Mr. Rohlfs's Supplemental Testimony are necessary to conduct an adequate review of the application. Receiving this information with the request will facilitate the review of applications for an AAO. Moreover, if this information is provided as part of the initial filing, it will be included on the KCC's website and will be available to other parties in a timely manner so that they can participate in the review process as well.

CURB does not agree, however, with Mr. Rohlfs's proposal that the KCC Staff recommend a suspension period to the KCC that may be shorter than the required 240 days, unless this proposal is expanded to require the agreement of all parties to a shorter suspension period. The amount of time necessary to review an AAO application depends on many factors, including the resources available to each party at any given time. If a shorter suspension period was recommended and adopted in spite of opposition by CURB, then CURB would be at a serious disadvantage in its ability to review the application and to address issues that impact its stakeholders. Accordingly, I recommend that the 240-day suspension period continue to apply, unless there is unanimous agreement among the parties that a shorter suspension period is acceptable.

In summary, I generally concur with Mr. Rohlfs that the current process works well. I also agree that review of applications for AAOs would be facilitated by requiring additional information to be provided with the application, as outlined in Mr. Rohlfs's Supplemental Testimony. However, there should be no change in the 240 day suspension period unless there is unanimous agreement among the parties that a shorter suspension period would be appropriate.

G. <u>Selective Catalytic Reduction ("SCR") Catalyst Expense</u>

Q. Please describe the Company's adjustment relating to the SCR catalyst.

A. Westar has included an adjustment to increase its SCR catalyst costs to reflect an average of actual test year costs and the estimate for costs to be incurred in November 2012. As explained by Mr. Kongs on page 17 of his testimony, the initial SCR and associated catalyst costs were capitalized and placed into service in 2007 and 2009, respectively. While significant costs associated with the catalyst were incurred in the test year, the Company claims that the test year is not representative of prospective costs, and therefore it has made an adjustment to average the test year costs with the projected 2012 costs.

Q. What do you recommend?

A. I recommend that the KCC reject the Company's adjustment. Including SCR catalyst costs that are not expected to be incurred until November 2012 would result in utility rates being established based on speculative costs, in violation of the test year concept traditionally used by the KCC. This is especially true in this case, since Westar has a limited history with regard to the SCR catalyst costs and therefore we do not have sufficient historic information that would allow the KCC to properly evaluate the proposed 2012 costs. Moreover, the 2012 costs proposed by Westar are higher than the costs projected for the following three cycles through September of 2016. For all these reasons, I recommend that the KCC deny the Company's proposal to include an average of test costs and 2012 costs in its revenue requirement. My recommendation is shown in Schedule ACC-21.

H. Gain on Sale of Fuel Oil

Q. Please describe your adjustment relating to the gain on the sale of fuel oil.

A. As discussed in the rate base section of this testimony, Westar's filing includes a gain on the sale of #6 fuel oil that was the result of an agreement with the EPA to reduce inventories at certain sites. Westar has proposed to allocate 37.5% of this gain to shareholders and to amortize this gain over three years. I am recommending allocating 100% of this gain to ratepayers. At Schedule ACC-22, I have made an adjustment to reflect my recommended

100% allocation to ratepayers, instead of the 37.5% allocation proposed by Westar.

Q. How did you quantify your adjustment?

A. To quantify my adjustment, I utilized the updated after-tax gain on the sale, as reported in the Company's response to KCC-346. I have allocated 100% of this amount to ratepayers, using the three-year amortization period proposed by Westar.

I. <u>Bad Debt Expense</u>

Q. Please describe the Company's claim for bad debt expense.

A. Westar's claim is based on a three-year average of actual net charge-offs incurred as a percentage of revenue. This resulted in an uncollectible percentage of 0.4022%.

Q. Are you recommending any adjustment to the Company's claim?

A. I have accepted the use of a three-year average of net charge-offs to determine uncollectible expense in this case. However, since I am recommending a lower rate increase than the revenue increase proposed by the Company, it is necessary to make an adjustment to the Company's claim to reflect the pro forma revenue levels contained in my testimony.

Q. How did you quantify your adjustment?

A. My adjustment is shown in two parts. In Schedule ACC-23, I have made an adjustment to eliminate the Company's bad debt expense claim relating to its proposed revenue increase.

In addition, I revised my revenue multiplier to include an uncollectible expense factor, based on the uncollectible rates requested by Westar in this case. This methodology ensures that rates will reflect the appropriate uncollectible expense associated with the level of the rate increase that I am proposing in this case. Moreover, should the KCC make other adjustments to the Company's claim, my recommended methodology will result in reflecting an appropriate level of uncollectible costs in base rates.

J. Vegetative Management Expense

Q. Please describe the Company's proposal relating to the Reliabilitree® program.

A. As discussed in the testimonies of Ms. Williams and Mr. Armstrong, the Company implemented a pruning and vegetative management program in July 2010 that it has named Reliabilitree®.[12] The program was initially implemented in the Wichita area. As described by Ms. Williams at page 10 of her testimony, "[u]der the Reliabilitree® program, Westar clears (removes) or prunes trees through the program area and then maintains the vegetation by returning every four to five years for follow-up pruning and/or removal." Westar is seeking to expand this program to its entire service area.

Q. How much is Westar seeking in this case relating to vegetative management?

A. Westar's pro forma revenue requirement includes $43.82 million for vegetative management, representing an increase of $20.05 million over the test year actual costs.

12 Ms. Williams has since retired. Her testimony will be adopted by Jeffrey L. Martin.

Q. How did Westar determine its pro forma vegetative management costs in this case?

A. Westar's claim is based on the average of projected costs from 2012 to 2016 for the Reliabilitree® program, plus an additional $5.54 million for other vegetative management costs. Alternatively, the Company also estimated costs for a more limited expansion involving the larger, denser communities of Topeka, Lawrence, Manhattan, Junction City, Marysville, Shawnee, Leavenworth, Atchison, and Hiawatha, at a cost of $34.68 million.

Q. How much has the Company spent over the past few years on vegetative management activities?

A. According to the response to CURB-130, vegetative management costs have fluctuated over the past five years, as shown below:

Year	Total Costs
2010	$23,174,828
2009	$19,645,218
2008	$19,050,028
2007	$24,441,969
2006	$23,199,433

Q. What level of vegetative management costs are you recommending be reflected in the Company's revenue requirement?

A. Conceptually, I am not opposed to the Company transitioning to a cycle program, similar to the program proposed by Westar. However, I believe that Westar's specific proposal in this case is excessive, especially considering the fact that it reflects 2014-2016 costs. Moreover, Westar's claim reflects an increase of almost 85% over the actual test year costs. Therefore, I am recommending that the KCC approve vegetative management costs of $34.68 million, consistent with the Company's alternative proposal. This would still represent an increase of almost 46% from the actual costs incurred in the test year and it would allow Westar to greatly expand the Reliabilitree® program to the majority of its service territory. It would also allow the Company to gain some additional experience with the program on a wider scale. It will allow the Company to expand the program in a controlled and systematic manner while it obtains the labor and other resources necessary for full scale deployment. It will also provide the Company, and the KCC, with the opportunity to gather additional data about the benefits of the program and any resulting cost savings. For all these reasons, I believe that providing for a limited expansion of the Reliabilitree® program is the best course of action at this time. Therefore, at Schedule ACC-24, I have made an adjustment to reduce the Company's claim to reflect $34.68 million of annual vegetative management costs.

Q. Did Westar also propose a more limited phase-in, using a tracker mechanism for vegetative management costs?

A. Yes, it did. Since the Company's primary proposal and its alternative proposal are both based on levelizing costs over a multi-year period, the Company has proposed yet another option if the KCC prefers a more gradual ramp-up in vegetative management costs. As described in the testimony of Mr. Armstrong at pages 11-15, Westar offers another proposal whereby actual vegetative management costs would be tracked, and actual costs exceeding those recovered in rates would be deferred in a regulatory asset account between base rate cases. While this tracker has some intuitive appeal, such a tracker would be just another example of the shifting of regulatory risk from ratepayers to shareholders. As noted earlier in my testimony, ratepayers are already burdened by many surcharge mechanisms that guarantee the Company dollar-for-dollar recovery, such as the RECA, ECRR, EER, TDC, and PTS. In addition, shareholders are now guaranteed recovery of pension, OPEB, and other post employment costs through the pension tracker, as well as being guaranteed recovery of storm damage costs and other costs subject to deferral. The last thing that ratepayers need, or deserve, is another tracker mechanism. Therefore, I recommend that the KCC reject Westar's offer to implement a tracking mechanism for vegetative management costs.

K. <u>Non-Recurring Expense</u>

Q Are there non-recurring costs included in the Company's revenue requirement claim that you recommend the KCC eliminate?

A. Yes, there are. During the test year, Westar made a non-recurring payment to Ventex, as shown in the response to KCC-38. It is my understanding that this payment was the result of litigation between the parties. Since this payment is not likely to reoccur, then it should be eliminated from the Company's revenue requirement claim. I have made this adjustment at Schedule ACC-25.

L. Rate Case Expense

Q. How did the Company determine its rate case expense claim in this case?

A. Westar's claim is based on projected costs for the current case of $2,699,602. In addition, the Company included $100,579 in unrecovered costs from prior cases, for a total claim of $2,800,181. Westar proposes to amortize these costs over a three-year period, for an annual amortization expense of $933,394. This represents an increase of $146,572 over the actual test year costs of $786,821.

Q. What are the components of the Company's claim of approximately $2.7 million for costs associated with the current case?

A. As shown in the workpapers to Adjustment IS-14, the Company's claim consists of the following:

Rate Design	$200,000
Accounting Support	$549,602
Employee Benefit Support	$50,000
Legal Support	$150,000
Staff and CURB Consultants	$1,750,000
Total	$2,699,602

Q. Do you believe that the Company's claim is reasonable?

A. No, I do not. Rate case costs have been skyrocketing in Kansas. Utilities apparently believe that they have blank checks when it comes to rate case costs. Although the use of consultants in rate cases is fairly widespread, it is unusual to have an outside consultant sponsor major accounting adjustments, as is the case here with Mr. Armstrong. Westar has budgeted $549,602 for accounting support, which includes a contract with Mr. Armstrong for $480,000.[13] Moreover, that contract does not appear to be based on hours worked and hourly rates, but instead provides for monthly payments to Mr. Armstrong of $17,500, in addition to a meals and lodging allowance of up to $2,500 per month. Westar paid Mr. Armstong $152,030 through November 29, 2011, which seems excessive given that Mr. Armstong only provided 15 pages of accounting testimony on six accounting adjustments.

Westar also has a $300,000 contract with Mr. Raab for certain rate design services, with a billable rate of $250 per hour; a $50,000 contract with The Prime Group, with rates of $150 to $200 per hour; and a $200,000 contract relating to the depreciation study filed in this case, with hourly rates of up to $350 per hour. According to the response to CURB-41, none of these contracts was the subject of a competitive bidding process. In addition, the estimate of $1.75 million for costs incurred by CURB and Staff appears excessive.

Q. How much did Westar incur in rate case costs for its last general base rate case, KCC Docket No. 08-WSEE-1041-RTS ("1041 Proceeding")?

13 Contracts were provided in the response to CURB-40.

A. According to the response to CURB-39, Westar incurred costs of $739,732 for KCC Docket No. 08-WSEE-1041-RTS. In my opinion, the issues in this case are no more numerous or complex than the issues in that case. In fact, the issues in this case are less complex in many ways, since rates have now been consolidated for Westar North and Westar South. In addition, in the 1041 Proceeding, the Company filed a depreciation study seeking a significant increase in depreciation rates, while in this case, the Company is seeking a reduction in depreciation rates.

Q. What do you recommend?

A. I am recommending that the KCC limit the rate case costs recovered from ratepayers to $1.7 million, reflecting a reduction of $1 million from the Company's claim. This recommendation would still result in a rate case allowance that was more than double the costs incurred in the 1041 Proceeding. In addition, my recommendation appears reasonable given the fact that the Company has only incurred rate case costs of $635,346 through November 28, 2011, as reported in the response to KCC-380. My recommendation is shown in Schedule ACC-26. I have amortized my pro forma rate case costs over three years, consistent with the amortization period used by Westar in its filing.

It should be noted that the KCC is currently examining the issue of rate case costs in KCC Docket No. 10-KCPE-415-RTS and a decision in that case is expected shortly. Any policy decisions on rate case costs made by the KCC in that case should be applied to Westar's rate case cost claim in this case as well, if appropriate.

M. Advertising Expense

Q. Did the Company exclude any test year advertising costs from its revenue requirement claim?

A. Yes, it did. According to the testimony of Mr. Heim at page 10, Westar excluded certain costs related to advertising that is "principally to promote Westar's image."

Q. Are you recommending any further adjustments to the Company's claim for advertising costs?

A. Yes, I am. Based upon my review of the Company's data request responses, I am recommending that the KCC disallow several expenditures that appear to be directed at promoting Westar's corporate image. These include local rodeo sponsorship, ads in an economic development guide, and other event sponsorships per the response to KCC-174. In addition, Westar has classified certain costs as dues that should be disallowed on the basis that they also relate to sponsorships and other activities intended to promote the company's corporate image, as shown in the responses to KCC-169 and KCC-300. Since these costs relate to efforts to promote the Westar corporate image, the KCC should disallow these costs for ratemaking purposes. These costs are not necessary to the provision of safe and adequate utility service. Instead, these costs should be borne by shareholders. Therefore, I am recommending that the KCC disallow $27,445 in advertising costs and membership dues. My adjustment is shown in Schedule ACC-27.

N. Meals and Entertainment Expense

Q. Are you recommending any adjustment to the Company's meals and entertainment expense claim?

A. Yes, I am. The Company has included in its filing $474,471 of meals and entertainment expenses that are not deductible on the Company's income tax return. These are costs that the IRS has determined are not appropriate deductions for federal tax purposes. If these costs are not deemed to be appropriate business expenses by the IRS, it seems reasonable to conclude that they are not appropriate business expenses to include in a regulated utility's cost of service. Accordingly, at Schedule ACC-28, I have made an adjustment to eliminate these costs from the Company's revenue requirement. While there may be certain costs for meals that should be borne by ratepayers, there are also likely to be costs included in this category that should be entirely excluded from the Company's revenue requirement. Therefore, my recommendation to use the 50% IRS criteria, provides a reasonable balance between shareholders and ratepayers and should be adopted by the KCC.

O. Interest on Customer Deposits

Q. How did the Company determine its claim for interest on customer deposits?

A. The Company's filing includes interest on customer deposits based on the level of customer deposits at the end of the test year and on an interest rate of 0.5%. Since interest costs are booked below-the-line, these costs were not included in the Company's actual test year operating costs. Therefore Westar made an adjustment to move these costs above-the-line. Such an adjustment is appropriate, since customer deposits are subtracted from rate base as non-investor supplied capital. Since ratepayers receive a rate base deduction for customer deposits, the Company should be given the opportunity to recover the associated interest costs.

Q. Are you recommending any adjustment to the Company's claim for interest on customer deposits?

A. Yes, I am. I am recommending that the Company's interest adjustment be revised to allocate a portion of this interest to the transmission function. In determining its rate base claim, Westar reflected a rate base deduction of $19,781,909 relating to customer deposits. This claim was based on total customer deposits of $23,321,523, less $3,539,614 allocated to transmission, as shown in Section 14, Schedule 14-A of the Company's filing. However, when Westar calculated its pro forma interest expense, it included total customer deposits of $23,321,523 in its calculation. Therefore, the expense included in the Company's filing relating to interest on customer deposits is not synchronized with the actual level of customer deposits deducted from rate base. At Schedule ACC-29, I have made an adjustment to exclude interest on customer deposits that are allocated to the transmission function.

P. <u>Depreciation Expense</u>

Q. How did the Company calculate its depreciation expense claim in this case?

A. Westar reflected several adjustments to its actual test-year booked depreciation expense. These adjustments included an annualization adjustment to reflect annualized depreciation expenses at current depreciation rates based on the Company's plant balances at the end of the test year; an adjustment to reflect the results of a new depreciation study; and an adjustment to remove depreciation expense on plant recovered through the ECRR.

Q. Did CURB examine the new depreciation rates being proposed by Westar in this case?

A. No, CURB did not engage a depreciation expert in this case to examine the Company's proposed depreciation study. However, it is CURB's understanding that the KCC Staff did engage such an expert. Therefore, while I have not included any adjustments relating to the new depreciation study in this testimony, CURB reserves its right to adopt recommendations that may be proposed by KCC Staff or other parties in this case.

Q. Are you recommending any depreciation expense adjustments relating to the Company's annualization adjustment or to its adjustment relating to depreciation on environmental upgrades?

A. Yes, the Company eliminated from its revenue requirement claim depreciation expense associated with plant recoverable through the ECRR. The ECRR includes a surcharge to recover both the return on investment associated with the environmental plant upgrades as well as the associated depreciation expense. Since it is the Company's position that these costs should continue to be recovered through the ECRR, Westar eliminated the environmental plant upgrades as well as the associated depreciation expense from its revenue requirement claim. However, CURB recommends that the costs currently being recovered through the ECRR be rolled back into base rates as a result of this proceeding. Therefore, at Schedule ACC-30, I have made an adjustment to add back to the Company's revenue requirement the depreciation expense currently being recovered through the ECRR.

Q. <u>Interest Synchronization and Taxes</u>

Q. Have you adjusted the pro forma interest expense for income tax purposes?

A. Yes, I made this adjustment at Schedule ACC-31. This adjustment is consistent (synchronized) with CURB's recommended rate base, capital structure, and cost of capital recommendations. Because CURB is recommending rolling the investment currently being recovered through the ECRR back into base rates, my recommended rate base is actually higher than the rate base the Company included in its filing. CURB's recommendations result in higher pro forma interest expense for Westar. This higher interest expense, which is an income tax deduction for state and federal tax purposes, will result in a decrease to the Company's income tax liability under CURB's recommendations. Therefore, CURB's recommendations result in an interest synchronization adjustment that reflects a lower income tax burden, and an increase to pro forma income at present rates.

Q. What income tax factor have you used to quantify your adjustments?

A. As shown on Schedule ACC-32, I have used a composite income tax factor of 39.55%, which includes a state income tax rate of 7.00% and a federal income tax rate of 35%.

Q. What revenue multiplier are you recommending in this case?

A As shown in Schedule ACC-33, I am recommending a revenue multiplier of 1.66094. This revenue multiplier includes the state income tax rate of 7.0%, the federal income tax rate of 35%, and an uncollectible rate of 0.4022%. As discussed earlier in this testimony, I am recommending that the KCC adjust the revenue multiplier to reflect the uncollectible costs associated with the level of rate relief that I am recommending in this case.

VIII. REVENUE REQUIREMENT SUMMARY

Q. What is the result of the recommendations contained in your testimony?

A. My adjustments result in a base rate revenue deficiency at present rates of $44,858,841, as summarized on Schedule ACC-1. This recommendation reflects revenue requirement adjustments of $45,973,938 to the Company's proposed increase of $90,832,779. Coincident with this base rate increase, the ECRR surcharge should be reduced by $56,461,006 to reflect the fact that these costs are now being recovered in base rates. The only costs remaining in the ECRR should be the costs relating to the prior year true-up, which is $268,130 on an annual basis.

Q. Have you quantified the revenue requirement impact of each of your recommendations?

A. Yes, at Schedule ACC-34, I have quantified the impact on Westar's revenue requirement of the rate of return, rate base, and expense recommendations contained in this testimony.

Q. Have you developed a pro forma income statement for Westar?

A. Yes, Schedule ACC-35 contains a pro forma income statement, showing utility operating income under several scenarios, including the Company's claimed operating income at present rates, my recommended operating income at present rates, and operating income under my proposed rate increase. My recommendations will result in an overall return on rate base of 7.54%.

Q. Does this conclude your testimony?

A. Yes, it does.

<u>VERIFICATION</u>

STATE OF CONNECTICUT)

COUNTY OF FAIRFIELD) ss:

Andrea C. Crane, being duly sworn upon her oath, deposes and states that she is a consultant for the Citizens' Utility Ratepayer Board, that she has read and is familiar with the foregoing testimony, and that the statements made herein are true to the best of her knowledge, information and belief

Andrea C. Crane

Andrea C. Crane

Subscribed and sworn before me this 4TH day of JANUARY, 2012.

Notary Public Marjorie M. Levin

My Commission Expires: DECEMBER 31, 2013

APPENDIX A

List of Testimonies Filed Since January 2008

Company	Utility	State	Docket	Date	Topic	On Behalf Of
Puget Sound Energy, Inc.	E/G	Washington	UE-111048 UG-111049	12/11	Conservation Incentive Program and Others	Public Counsel
Puget Sound Energy, Inc.	G	Washington	UG-110723	10/11	Pipeline Replacement Tracker	Public Counsel
Empire District Electric Company	E	Kansas	11-EPDE-856-RTS	10/11	Revenue Requirements	Citizens' Utility Ratepayer Board
Comcast Cable	C	New Jersey	CR11030116-117	9/11	Forms 1240 and 1205	Division of Rate Counsel
Artesian Water Company	W	Delaware	11-207	9/11	Revenue Requirements Cost of Capital	Division of the Public Advocate
Kansas City Power & Light Company	E	Kansas	10-KCPE-415-RTS (Remand)	7/11	Rate Case Costs	Citizens' Utility Ratepayer Board
Midwest Energy, Inc.	G	Kansas	11-MDWE-609-RTS	7/11	Revenue Requirements	Citizens' Utility Ratepayer Board
Kansas City Power & Light Company	E	Kansas	11-KCPE-581-PRE	6/11	Pre-Determination of Ratemaking Principles	Citizens' Utility Ratepayer Board
United Water Delaware, Inc.	W	Delaware	10-421	5/11	Revenue Requirements Cost of Capital	Division of the Public Advocate
Mid-Kansas Electric Company	E	Kansas	11-MKEE-439-RTS	4/11	Revenue Requirements	Citizens' Utility Ratepayer Board
South Jersey Gas Company	G	New Jersey	GR10060378-79	3/11	BGSS / CIP	Division of Rate Counsel
Chesapeake Utilities Corporation	G	Delaware	10-296F	3/11	Gas Service Rates	Division of the Public Advocate
Westar Energy, Inc.	E	Kansas	11-WSEE-377-PRE	2/11	Pre-Determination of Wind Investment	Citizens' Utility Ratepayer Board
Delmarva Power and Light Company	G	Delaware	10-295F	2/11	Gas Cost Rates	Attorney General
Delmarva Power and Light Company	G	Delaware	10-237	10/10	Revenue Requirements Cost of Capital	Division of the Public Advocate
Pawtucket Water Supply Board	W	Rhode Island	4171	7/10	Revenue Requirements	Division of Public Utilities and Carriers
New Jersey Natural Gas Company	G	New Jersey	GR10030225	7/10	RGGI Programs and Cost Recovery	Division of Rate Counsel
Kansas City Power & Light Company	E	Kansas	10-KCPE-415-RTS	6/10	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Atmos Energy Corp.	G	Kansas	10-ATMG-495-RTS	6/10	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Empire District Electric Company	E	Kansas	10-EPDE-314-RTS	3/10	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Delmarva Power and Light Company	E	Delaware	09-414 and 09-276T	2/10	Cost of Capital Rate Design Policy Issues	Division of the Public Advocate
Delmarva Power and Light Company	G	Delaware	09-385F	2/10	Gas Cost Rates	Division of the Public Advocate
Chesapeake Utilities Corporation	G	Delaware	09-398F	1/10	Gas Service Rates	Division of the Public Advocate

Company	Utility	State	Docket	Date	Topic	On Behalf Of
Public Service Electric and Gas Company	E	New Jersey	ER09020113	11/09	Societal Benefit Charge Non-Utility Generation Charge	Division of Rate Counsel
Delmarva Power and Light Company	G	Delaware	09-277T	11/09	Rate Design	Division of the Public Advocate
Public Service Electric and Gas Company	E/G	New Jersey	GR09050422	11/09	Revenue Requirements	Division of Rate Counsel
Mid-Kansas Electric Company	E	Kansas	09-MKEE-969-RTS	10/09	Revenue Requirements	Citizens' Utility Ratepayer Board
Westar Energy, Inc.	E	Kansas	09-WSEE-925-RTS	9/09	Revenue Requirements	Citizens' Utility Ratepayer Board
Jersey Central Power and Light Co.	E	New Jersey	EO08050326 EO08080542	8/09	Demand Response Programs	Division of Rate Counsel
Public Service Electric and Gas Company	E	New Jersey	EO09030249	7/09	Solar Loan II Program	Division of Rate Counsel
Midwest Energy, Inc.	E	Kansas	09-MDWE-792-RTS	7/09	Revenue Requirements	Citizens' Utility Ratepayer Board
Westar Energy and KG&E	E	Kansas	09-WSEE-641-GIE	6/09	Rate Consolidation	Citizens' Utility Ratepayer Board
United Water Delaware, Inc.	W	Delaware	09-60	6/09	Cost of Capital	Division of the Public Advocate
Rockland Electric Company	E	New Jersey	GO09020097	6/09	SREC-Based Financing Program	Division of Rate Counsel
Tidewater Utilities, Inc.	W	Delaware	09-29	6/09	Revenue Requirements Cost of Capital	Division of the Public Advocate
Chesapeake Utilities Corporation	G	Delaware	08-269F	3/09	Gas Service Rates	Division of the Public Advocate
Delmarva Power and Light Company	G	Delaware	08-266F	2/09	Gas Cost Rates	Division of the Public Advocate
Kansas City Power & Light Company	E	Kansas	09-KCPE-246-RTS	2/09	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Jersey Central Power and Light Co.	E	New Jersey	EO08090840	1/09	Solar Financing Program	Division of Rate Counsel
Atlantic City Electric Company	E	New Jersey	EO06100744 EO08100875	1/09	Solar Financing Program	Division of Rate Counsel
West Virginia-American Water Company	W	West Virginia	08-0900-W-42T	11/08	Revenue Requirements	The Consumer Advocate Division of the PSC
Westar Energy, Inc.	E	Kansas	08-WSEE-1041-RTS	9/08	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Artesian Water Company	W	Delaware	08-96	9/08	Cost of Capital, Revenue, New Headquarters	Division of the Public Advocate
Comcast Cable	C	New Jersey	CR08020113	9/08	Form 1205 Equipment & Installation Rates	Division of Rate Counsel
Pawtucket Water Supply Board	W	Rhode Island	3945	7/08	Revenue Requirements	Division of Public Utilities and Carriers

Company	Utility	State	Docket	Date	Topic	On Behalf Of
New Jersey Natural Gas Company	G	New Jersey	GR07110889	5/08	Revenue Requirements	Division of Rate Counsel
Kansas Electric Power Cooperative, Inc.	E	Kansas	08-KEPE-597-RTS	5/08	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Public Service Electric and Gas Company	E	New Jersey	EX02060363 EA02060366	5/08	Deferred Balances Audit	Division of Rate Counsel
Cablevision Systems Corporation	C	New Jersey	CR07110894, et al.	5/08	Forms 1240 and 1205	Division of Rate Counsel
Midwest Energy, Inc.	E	Kansas	08-MDWE-594-RTS	5/08	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board
Chesapeake Utilities Corporation	G	Delaware	07-246F	4/08	Gas Service Rates	Division of the Public Advocate
Comcast Cable	C	New Jersey	CR07100717-946	3/08	Form 1240	Division of Rate Counsel
Generic Commission Investigation	G	New Mexico	07-00340-UT	3/08	Weather Normalization	New Mexico Office of Attorney General
Southwestern Public Service Company	E	New Mexico	07-00319-UT	3/08	Revenue Requirements Cost of Capital	New Mexico Office of Attorney General
Delmarva Power and Light Company	G	Delaware	07-239F	2/08	Gas Cost Rates	Division of the Public Advocate
Atmos Energy Corp.	G	Kansas	08-ATMG-280-RTS	1/08	Revenue Requirements Cost of Capital	Citizens' Utility Ratepayer Board

APPENDIX B

Supporting Schedules

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

REVENUE REQUIREMENT SUMMARY

	Company Claim (A)	Recommended Adjustment	Recommended Position	
1. Pro Forma Rate Base	$3,399,272,079	$350,490,175	$3,749,762,254	(B)
2. Required Cost of Capital	8.68%	-1.14%	7.54%	(C)
3. Required Return	$295,087,410	($12,357,190)	$282,730,220	
4. Operating Income @ Present Rates	240,178,995	15,543,121	255,722,116	(D)
5. Operating Income Deficiency	$54,908,415	($27,900,311)	$27,008,104	
6. Revenue Multiplier	1.6543		1.6609	(E)
7. Revenue Requirement Increase	**$90,832,779**	**($45,973,938)**	**$44,858,841**	
8. Reduction in ECRR Surcharge			($56,461,006)	(F)
9. Net Rate Increase			**($11,602,165)**	

Sources:
(A) Company Filing, Section 3, Schedule 3-A, Page 1.
(B) Schedule ACC-2.
(C) Schedule ACC-9.
(D) Schedule ACC-14.
(E) Schedule ACC-33.
(F) Attachment A to Staff Report in Docket No. 09-WSEE-737-TAR-CPL-1. Excludes true-up.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

REQUIRED COST OF CAPITAL

	Amount (A)	Capital Structure	Cost Rate		Weighted Cost
1. Common Equity	$2,795,706,331	50.04%	8.85%	(B)	4.43%
2. Long Term Debt	2,495,002,500	44.66%	6.65%		2.97%
3. Preferred Stock	21,436,300	0.38%	4.55%		0.02%
4 Short Term Debt	222,851,568	3.99%	1.40%	(C)	0.06%
5. Post 1970 ITCs	51,775,480	0.93%	7.54%	(D)	0.07%
6. Total Cost of Capital	$5,586,772,179	100.00%			7.54%

Sources:
(A) Response to KCC-322, unless otherwise noted.
(B) Schedule ACC-3
(C) Short-term debt amount reflects test year average monthly balances per the response to CURB-89.
Short-term debt rate per the response to CURB-90.
(D) Rate based on average cost of capital excluding ITCs.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

RECOMMENDED COST OF EQUITY

1. Discounted Cash Flow Result (A)	9.73%	
2. Discounted Cash Flow Weighting (B)	75.00%	7.30%
3. CAPM Result (C)	6.18%	
4. CAPM Weighting (B)	25.00%	1.55%
5. Recommended Return on Equity		**8.85%**

Sources:
(A) Schedule ACC-4.
(B) Based on Commission's reliance primarily upon the DCF method.
(C) Schedule ACC-7.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

DISCOUNTED CASH FLOW RESULT

1. Dividend Yield	4.12%	(A)
2. Growth in Dividend Yield	0.11%	(B)
3. Growth Rate	5.50%	(C)
4. Total Cost of Equity	**9.73%**	

Sources:
(A) Derived from Schedule ACC-5.
(B) Line 1 X (50% of Line 3).
(C) Derived from Schedule ACC-6.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

AVERAGE DIVIDENDS

	Company	Dividend	Price 12/13/11	Dividend Yield
1.	Allete, Inc.	1.78	40.09	4.44%
2.	Alliant Energy Corp.	1.70	41.86	4.06%
3.	Avista Corp.	1.10	25.36	4.34%
4.	Cleco Corporation	1.25	35.95	3.48%
5.	Great Plains Energy, Inc.	0.85	21.03	4.04%
6.	IDACORP	1.20	40.80	2.94%
7.	Northwestern Corp.	1.44	34.03	4.23%
8.	Pinnacle West Capital Corp.	2.10	46.03	4.56%
9.	Portland General Electric	1.06	24.44	4.34%
10.	TECO Energy, Inc.	0.86	18.22	4.72%
11.	Average			**4.11%**

	Company	Dividend	15 Day Average Closing Price*	15 Day Average Dividend Yield
1.	Allete, Inc.	1.78	39.51	4.51%
2.	Alliant Energy Corp.	1.70	41.89	4.06%
3.	Avista Corp.	1.10	25.05	4.39%
4.	Cleco Corporation	1.25	35.58	3.51%
5.	Great Plains Energy, Inc.	0.85	20.68	4.11%
6.	IDACORP	1.20	40.50	2.96%
7.	Northwestern Corp.	1.44	34.60	4.16%
8.	Pinnacle West Capital Corp.	2.10	46.58	4.51%
9.	Portland General Electric	1.06	24.59	4.31%
10.	TECO Energy, Inc.	0.86	18.33	4.69%
11.	Average			**4.12%**

* Average of 15 days from November 29, 2011 through December 13, 2011.

Sources:
Yahoo Finance - December 14, 2011.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

GROWTH RATES

Company	Five Year Historic Earnings	Five Year Historic Dividends	Five Year Historic Bk. Value	Ten Year Historic Earnings	Ten Year Historic Dividends	Ten Year Historic Bk. Value
1. Allete, Inc.	3.50%	17.50%	5.00%	-	-	-
2. Alliant Energy Corp.	9.00%	0.50%	3.50%	3.00%	-3.50%	1.00%
3. Avista Corp.	11.50%	10.00%	4.00%	4.00%	2.00%	4.00%
4. Cleco Corporation	7.50%	0.50%	11.00%	4.50%	1.00%	7.50%
5. Great Plains Energy, Inc.	-11.50%	-8.00%	7.00%	-3.50%	-4.00%	4.00%
6. IDACORP	11.00%	-2.50%	4.50%	-0.50%	-4.50%	3.50%
7. Northwestern Corp.	-	22.00%	-	-	-	-
8. Pinnacle West Capital Corp.	0.50%	3.00%	0.50%	-2.50%	4.50%	2.50%
9. Portland General Electric	7.50%	-	2.00%	-	-	-
10. TECO Energy, Inc.	12.00%	-0.50%	5.00%	-5.50%	-4.50%	-1.50%
11. Average	**5.67%**	**4.72%**	**4.72%**	**-0.07%**	**-1.29%**	**3.00%**

Company	Five Year Projected Earnings	Five Year Projected Dividends	Five Year Projected Bk. Value
1. Allete, Inc.	4.50%	2.00%	3.00%
2. Alliant Energy Corp.	7.00%	6.00%	3.00%
3. Avista Corp.	4.50%	9.00%	3.00%
4. Cleco Corporation	6.00%	9.50%	6.50%
5. Great Plains Energy, Inc.	6.00%	Nil	2.00%
6. IDACORP	4.00%	4.00%	5.00%
7. Northwestern Corp.	-	-	-
8. Pinnacle West Capital Corp.	6.00%	1.50%	2.50%
9. Portland General Electric	7.50%	3.00%	3.50%
10. TECO Energy, Inc.	10.50%	4.50%	5.00%
11. Average	**6.22%**	**4.94%**	**3.72%**

Sources:
Value Line Investment Survey - September 23, November 4, and November 25, 2011.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

CAPITAL ASSET PRICING MODEL RESULT

Risk Free Rate + (Beta X Market Premium)

3.06% + (.71 X 4.40%) = **6.18%**
(A) (B) (C)

Sources:
(A) Risk Free Rate at December 12, 2011.
(B) Beta per Schedule ACC-8.
(C) Market Premium per Ibbotson SBBI: 2011 Valuation Yearbook, Market Results for Stocks, Bonds, Bills and Inflation, 1926-2010, Table 2-1, Morningstar.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

COMPARABLE GROUP BETAS

		(A)
1.	Allete, Inc.	0.70
2.	Alliant Energy Corp.	0.70
3.	Avista Corp.	0.70
4.	Cleco Corporation	0.65
5.	Great Plains Energy, Inc.	0.75
6.	IDACORP	0.70
7.	Northwestern Corp.	0.70
8.	Pinnacle West Capital Corp.	0.70
9.	Portland General Electric	0.75
10.	TECO Energy, Inc.	0.85
11.	Average	0.71

Sources:
(A) Value Line Investment Survey - September 23, November 4, and November 25, 2011.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

RATE BASE SUMMARY

	Company Claim (A)	Recommended Adjustment		Recommended Position
1. Total Utility Plant in Service	$6,854,742,909	$391,975,743	(B)	$7,246,718,652
Less:				
2. Accumulated Depreciation	(2,843,658,525)	(34,462,732)	(C)	(2,878,121,257)
3. Net Utility Plant	$4,011,084,384	$357,513,011		$4,368,597,395
Plus:				
4 Materials and Supplies	$106,946,033	$0		$106,946,033
5. Prepayments	9,737,585	0		9,737,585
6. Working Funds	0	0		0
7. Nuclear Fuel	59,090,775	0		59,090,775
8. Fossil Fuel	74,698,763	(7,022,836)	(D)	67,675,927
9. Regulatory Assets	35,635,061			35,635,061
Less:				
10. Cost Free Capital	($897,920,522)	$0		($897,920,522)
11. Total Rate Base	**$3,399,272,079**	**$350,490,175**		**$3,749,762,254**

Sources:
(A) Company Filing, Section 3, Schedule 3-A and Section 6, Schedule 6-A.
(B) Schedules ACC-10 and ACC-11.
(C) Schedule ACC-10.
(D) Schedules ACC-12 and ACC-13.

Schedule ACC-10

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

UTILITY PLANT IN SERVICE-ECRR

1.	ECRR Plant Adjustment	$275,469,921	(A)
2	ECRR Accumulated Depreciation Adj.	(34,462,732)	(A)
3.	Net ECRR Plant Adjustment	**$241,007,189**	

Sources:
(A) Company Filing, Section 3, Schedule 3-C, page 1.

Schedule ACC-11

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

CONSTRUCTION WORK IN PROGRESS

1.	Generation-Related CWIP	$153,908,902	(A)
2.	CWIP Recovered Through ECRR	145,397,536	(B)
3.	Total CWIP Allowance	$299,306,438	
4.	Company Claim	182,800,616	
5.	Recommended Adjustment	**$116,505,822**	

Sources:
(A) Company Filing, Workpapers to RB-04.
(B) Attachment A to Staff Report in Docket No. 09-WSEE-737-TAR-CPL-1.

Schedule ACC-12

WESTAR ENERGY, INC.

TEST YEAR ENDING MARCH 31, 2011

FOSSIL FUEL INVENTORY

1. Company Claim - Coal Inventory	$71,339,813	(A)
2. Thirteen Month Average Coal Inventory	67,914,333	(B)
3. Recommended Adjustment - Coal	($3,425,480)	
4. Correction to Fuel Oil Balances	1,171,467	(C)
5. Total Recommended Adjustment	**($2,254,013)**	

Sources:
(A) Company Filing, Section 6, Schedule 6-E, page 1.
(B) Response to KCC-305.
(C) Response to KCC-307.

Schedule ACC-13

WESTAR ENERGY, INC.

TEST YEAR ENDING MARCH 31, 2011

GAIN ON SALE OF FUEL OIL - RATE BASE

1. Total Gain On Sale	$7,953,254	(A)
2. Company Allocation to Ratepayers	3,184,431	(B)
3. Recommended Adjustment	**($4,768,823)**	

Sources:
(A) Response to KCC-346.
(B) Company Filing, Section 3, Schedule 3-C, page 2.

Schedule ACC-14

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

OPERATING INCOME SUMMARY OF ADJUSTMENTS

			Schedule No.
1.	Short-term Incentive Compensation Expense	$2,070,793	15
2.	Payroll Tax Expense	158,416	16
3.	Restricted Share Unit Expense	4,624,303	17
4.	Deferred Benefit Expense	2,877,454	18
5.	Supplemental Executive Retirement Plan Expense	1,149,241	19
6.	SmartStar Non-Labor Expense	261,949	20
7.	SCR Catalyst Expense	361,402	21
8.	Gain on Sale of Fuel Oil	960,918	22
9.	Bad Debt Expense	220,842	23
10.	Vegetative Management Expense	5,525,130	24
11.	Non-Recurring Expense	151,125	25
12.	Rate Case Expense	192,648	26
13.	Advertising Expense	15,862	27
14.	Meals and Entertainment Expenses	274,218	28
15.	Interest on Customer Deposits Expense	10,699	29
16.	Depreciation Expense	(5,728,330)	30
17.	Interest Synchronization	2,416,453	31
18.	Recommended Adjustments	**$15,543,121**	

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

SHORT-TERM INCENTIVE COMPENSATION EXPENSE

1. Company Claim		$9,763,030	(A)
2. Allocation to Shareholders @ 50%		4,881,515	(B)
3. Recommended Adjustment		$4,881,515	
4. Percentage Expensed		73.40%	(C)
5. Recommended Expense Adjustment		$3,583,032	
6. Allocation to Transmission	4.39%	157,403	(D)
7. Net Expense Adjustment		$3,425,629	
8. Income Taxes @	39.55%	1,354,836	
9. Operating Income Impact		**$2,070,793**	

Sources:
(A) Response to CURB-16.
(B) Recommendation of Ms. Crane.
(C) Based on the capitalization rate per the response to KCC-207.
(D) Percentage fom Company workpaper, Adjustment IS-27.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

PAYROLL TAXES

1. Incentive Compensation Adjustment		$3,425,629	(A)
2. Payroll Tax Rate		7.65%	(B)
3. Payroll Tax Adjustment		262,061	
3. Income Taxes @	39.55%	103,645	
4. Operating Income Impact		**$158,416**	

SOURCES:
(A) Schedule ACC-15.
(B) Reflects statutory rate.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

RESTRICTED SHARE UNIT EXPENSE

1. Recommended Adjustment		$8,001,295	(A)
2. Allocation to Transmission @	4.39%	351,497	(B)
3. Recommended Net Adjustment		$7,649,798	
4. Income Taxes @	39.55%	3,025,495	
5. Operating Income Impact		**$4,624,303**	

Sources:
(A) Responses to CURB-16 and CURB-17.
(B) Percentage fom Company workpaper, Adjustment IS-27.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

DEFERRED BENEFIT EXPENSE

1. Total Deferred Costs		$37,340,802	(A)
2. Recommended Amortization		5	(B)
3. Annual Amortization		$7,468,160	
4. Company Claim		12,446,934	(A)
5. Recommended Adjustment		$4,978,774	
6. Allocation to Transmission @	4.39%	218,718	(C)
7. Recommended Net Adjustment		$4,760,056	
8. Income Taxes @	39.55%	1,882,602	
9. Operating Income Impact		**$2,877,454**	

Sources:
(A) Response to CURB-25.
(B) Recommendation of Ms. Crane.
(C) Percentage fom Company workpaper, Adjustment IS-27.

Schedule ACC-19

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

SUPPLEMENTAL EXECUTIVE RETIREMENTS PLAN EXPENSE

1. Recommended Adjustment		$1,988,497	(A)
2. Allocation to Transmission @	4.39%	87,355	(B)
3. Recommended Net Adjustment		$1,901,142	
4. Income Taxes @	39.55%	751,902	
5. Operating Income Impact		**$1,149,241**	

Sources:
(A) Response to CURB-20.
(B) Percentage fom Company workpaper, Adjustment IS-27.

Schedule ACC-20

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

SMARTSTAR NON-LABOR COSTS

1. Deferred Costs Through 10/31/11		$1,700,000	(A)
2. Recommended Amortization Period		5	(B)
3. Pro Forma Annual Amortization Expense		$340,000	
4. Test Year Actual		773,332	(A)
5. Recommended Adjustment		$433,332	
6. Income Taxes @	39.55%	171,383	
7. Operating Income Decrease		**$261,949**	

Sources:
(A) Supplemental Direct Testimony of Mr. Rohlfs, page 4.
(B) Recommendation of Ms. Crane.

Schedule ACC-21

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

SCR CATALYST EXPENSE

1. Test Year Costs		$1,520,710	(A)
2. Company Claim		2,118,563	(A)
3. Recommended Adjustment		$597,853	
4. Income Taxes @	39.55%	236,451	
5. Operating Income Impact		**$361,402**	

Sources:
(A) Company Filing, Workpapers to Adjustment IS-21.

Schedule ACC-22

WESTAR ENERGY, INC.

TEST YEAR ENDING MARCH 31, 2011

GAIN ON SALE OF FUEL OIL - AMORTIZATION EXPENSE

1. Total Gain On Sale		$7,953,254	(A)
2. Proposed Amortization Period		3	(B)
3. Recommended Adjustment		$2,651,085	
4. Company Claim		1,061,477	(B)
5. Recommended Adjustment		$1,589,608	
6. Income Taxes @	39.55%	628,690	
7. Operating Income Impact		**$960,918**	

Sources:
(A) Response to KCC-346.
(B) Company Filing, Workpapers to RB-10.

Schedule ACC-23

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

BAD DEBT EXPENSE

1. Proposed Rate Increase		$90,832,779	(A)
2. Uncollectible Rate		0.40220%	(B)
3. Recommended Adjustment		$365,329	
4. Income Taxes @	39.55%	144,488	
5. Operating Income Impact		**$220,842**	

Sources:
(A) Company Filing, Section 3, Schedule 3A.
(B) Company Filing, Workpapers to Adjustment IS-22.

Schedule ACC-24

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

VEGETATIVE MANAGEMENT EXPENSE

1. Recommended Program Costs		$34,680,000	(A)
2. Company Claim		43,820,000	(B)
3. Recommended Adjustment		$9,140,000	
4. Income Taxes @	39.55%	3,614,870	
5. Operating Income Decrease		**$5,525,130**	

Sources:
(A) Testimony of Ms. Williams, Schedule CAW-8, page 1.
(B) Company Filing Workpapers to Adjustment IS-16.

TEST YEAR ENDED MARCH 31, 2011

TEST YEAR ENDED MARCH 31, 2011

NON-RECURRING EXPENSE

1. Recommended Adjustment		$250,000	(A)
2. Income Taxes @	39.55%	98,875	
3. Operating Income Impact		**$151,125**	

Sources:
(A) Response to KCC-38.

Schedule ACC-26

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

RATE CASE EXPENSE

1. Recommended Adjustment		$1,000,000	(A)
2. Amortization Period		3	(B)
3. Annual Adjustment		$333,333	
4. Allocation to Transmission @	4.39%	14,643	(C)
5. Recommended Net Adjustment		$318,690	
6. Income Taxes @	39.55%	126,042	
7. Operating Income Impact		**$192,648**	

Sources:
(A) Recommendation of Ms. Crane.
(B) Company Filing, Workpapers to Adjustment IS-14.
(C) Percentage fom Company workpaper, Adjustment IS-27.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

ADVERTISING EXPENSE

1. Recommended Adjustment		$27,445	(A)
2. Allocation to Transmission	4.39%	1,206	(B)
3. Net Expense Adjustment		$26,239	
4. Income Taxes @	39.55%	10,378	
5. Operating Income Impact		**$15,862**	

Sources:
(A) Response to KCC-174.
(B) Percentage fom Company workpaper, Adjustment IS-27.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

MEALS AND ENTERTAINMENT EXPENSE

1. Recommended Adjustment		$474,471	(A)
2. Allocation to Transmission	4.39%	20,844	
3. Net Expense Adjustment		$453,627	
4. Income Taxes @	39.55%	179,410	
5. Operating Income Impact		**$274,218**	

Sources:
(A) Response to CURB-49.
(B) Percentage fom Company workpaper, Adjustment IS-27.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

INTEREST ON CUSTOMER DEPOSITS EXPENSE

1. Customer Deposits		$23,321,523	(A)
2. Allocation to Transmission		3,539,614	(A)
3. Net Customer Deposits		$19,781,909	
4. Pro Forma Interest Rate		0.50%	(B)
5. Pro Forma Expense		$98,910	
6. Company Claim		116,608	(B)
7. Recommended Adjustment		$17,698	
8. Income Taxes @	39.55%	7,000	
9. Operating Income Impact		**$10,699**	

Sources:
(A) Company Filing, Section 14-A, page 1.
(B) Company Filing, Workpaper to IS-11.

Schedule ACC-30

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

DEPRECIATION EXPENSE

1. Depreciation Recovered Through ECRR		$9,476,146	(A)
2. Income Taxes @	39.55%	3,747,816	
3. Operating Income Impact		**$5,728,330**	

Sources:
(A) Attachment A to Staff Report in Docket No. 09-WSEE-737-TAR-CPL-1.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

INTEREST SYNCHRONIZATION

1.	Pro Forma Rate Base		$3,749,762,254	(A)
2.	Weighted Cost of Debt		3.03%	(B)
3.	Pro Forma Interest Expense		$113,465,680	
4.	Company Claim		107,355,811	(C)
5	Change in Interest Deduction		$6,109,869	
6	Income Taxes @	39.55%	**$2,416,453**	

Sources:
(A) Schedule ACC-9.
(B) Schedule ACC-2
(C) Section 11, Schedule 11-G.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

INCOME TAX FACTOR

1. Revenue	100.00%	
2. State Income Tax Rate	7.00%	(A)
3. Federal Taxable Income	93.00%	
4. Income Taxes @ 35%	32.55%	(A)
5. Operating Income	60.45%	
6. Total Tax Rate	**39.55%**	(B)

Sources:
(A) Reflects statutory rates.
(B) Line 2 + Line 4.

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

REVENUE MULTIPLIER

1. Revenue	100.000000	
2. Uncollectibles	0.402200	(A)
3. Net Revenue	99.597800	
4. State Income Taxes @ 7%	6.971846	(B)
5. Federal Taxable Income	92.625954	
6. Federal Income Taxes @ 35%	32.419084	(B)
7. Operating Income	60.206870	
8. Revenue Multiplier	**1.660940**	(C)

Sources:

(A) Company Filing, Workpapers to Adjustment IS-22.
(B) Reflects statutory tax rates.
(C) Line 1 / Line 7.

Schedule ACC-34

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

REVENUE REQUIREMENT IMPACT OF ADJUSTMENTS

1. Rate of Return	($64,417,857)
2. Rate Base Adjustments:	
3. Plant in Service	$30,182,308
4. Construction Work in Progress	14,590,497
5. Fossil Fuel Inventory	(282,279)
6. Fossil Fuel - Gain on Sale	(597,219)
Operating Income Adjustments:	
7. Short-term Incentive Compensation Expense	($3,439,463)
8. Payroll Tax Expense	(263,119)
9. Restricted Share Unit Expense	(7,680,690)
10. Deferred Benefit Expense	(4,779,278)
11. Supplemental Executive Retirement Plan Expense	(1,908,820)
12. SmartStar Non-Labor Expense	(435,082)
13. SCR Catalyst Expense	(600,267)
14. Gain on Sale of Fuel Oil	(1,596,027)
15. Bad Debt Expense	(366,805)
16. Vegetative Management Expense	(9,176,910)
17. Non-Recurring Expense	(251,010)
18. Rate Case Expense	(319,977)
19. Advertising Expense	(26,345)
20. Meals and Entertainment Expenses	(455,459)
21. Interest on Customer Deposits Expense	(17,770)
22. Depreciation Expense	9,514,413
23. Interest Synchronization	(4,013,584)
24. Revenue Multiplier	366,805
25. Total Adjustments	($45,973,938)
26. Company Claim	90,832,779
27. Recommended Increase	**$44,858,841**

WESTAR ENERGY, INC.

TEST YEAR ENDED MARCH 31, 2011

PRO FORMA INCOME STATEMENT

	Per Company	Recommended Adjustments	Pro Forma Present Rates	Recommended Rate Adjustment	Pro Forma Proposed Rates
1. Operating Revenues	$1,778,166,895	$0	$1,778,166,895	$44,858,841	$1,823,025,736
2. Operating Expenses	1,204,162,354	(30,929,003)	1,173,233,351	180,422	1,173,413,773
3. Depreciation and Amortization	184,207,061	9,476,146	193,683,207	0	193,683,207
4. Taxes Other than Income	75,107,102	(262,061)	74,845,041	0	74,845,041
5. Taxable Income Before Interest Exp.	$314,690,378	$21,714,918	$336,405,296	$44,678,419	$381,083,715
6. Interest Expense	107,355,811	6,109,869	113,465,680	0	113,465,680
7. Income Taxes @	74,511,379	6,171,797	80,683,176	17,670,315	98,353,491
8. Operating Income	$240,178,999	$15,543,121	$255,722,120	$27,008,104	$282,730,224
9. Rate Base	$3,399,272,079	$350,490,175	$3,749,762,254		$3,749,762,254
10. Rate of Return	7.07%	4.43%	6.82%		7.54%

APPENDIX C

Referenced Data Requests

CURB-8
CURB-16
CURB-17
CURB-20
CURB-25
CURB-39
CURB-40 (Partial)
CURB-41
CURB-49
CURB-72
CURB-89
CURB-90
CURB-116
CURB-130

KCC-38
KCC-62 (Partial)
KCC-169
KCC-174
KCC-179 (Partial)
KCC-207
KCC-292 (Voluminous, Not Included)
KCC-300
KCC-305 (Partial)
KCC-307
KCC-319
KCC-322 (Partial)
KCC-346
KCC-380 (Partial)
KCC-399

energytools, llc. DATA REQUEST EASY ACCESS MANAGEMENT SYSTEM

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Thursday, October 27, 2011
Logged in as: **[Marjorie Levin]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-08 :: Salary & Wage increases
Date: 0000-00-00

Question 1 (Prepared by Jim Armstrong)
Provide the percentage of salary and wage increases granted in each of the last five years, as well as any increases in 2011 to date. Please provide this information separately for union and non-union employees.

Response:
See the attached spreadsheet for the percentage increases in salary and wages by year.

Attachment File Name	Attachment Note
CURB-08.xlsx	

Westar Energy
Docket No. 12-WSEE-112-RTS

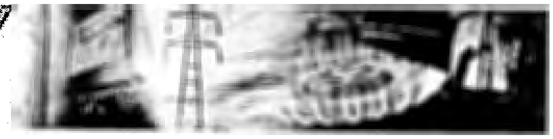
CURB DR-8
Union and non-Union Pay Increases

Year	Union		Non-Union	
2011	0.00%	**	2.00%	
2010	4.00%		3.65%	
2009	3.80%		2.70%	
2008	3.50%		4.44%	
2007	3.25%		5.74%	
			3.10%	*
2006	3.25%		3.23%	
			2.95%	*

* In 2006 and 2007, there was an additional round of salary increases given to the non-union workforce to restore Westar's maket position of the market median.

** Westar's union contact is currently being negotiated, thus the actual increase is not known at this time. Westar incorporated a 2 percent increase for the union into its filing consistent with our offer to the union.

energytools, llc. DATA REQUEST EASY ACCESS MANAGEMENT SYSTEM



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Monday, January 02, 2012
Logged in as: [**Andrea Crane**] Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-16 :: Incentive Compensation Programs
Date: 0000-00-00

Question 1 (Prepared by Jim Armstrong)
Please provide a description of all incentive compensation programs provided to employees. For each program, please provide a) a description of the program, b) the amount included in the Company's claim, and c) the actual amount incurred in each of the past five years.

Response:
a) Please refer to KCC-62 for descriptions of the incentive plans. b) and c) The attached spreadsheet shows the amounts actually incurred in each of the past five years as well as the level of such expense reflected in Westar's pro forma test year cost-of-service.

Attachment File Name	Attachment Note
CURB 16 incentives incurred.xlsx	

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Westar Energy
Docket No. 12-WSEE-112-RTS

CURB-16

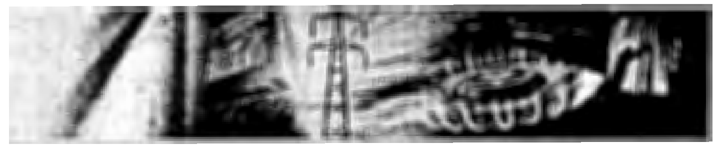
A. See response to KCC-62 for plan descriptions

B. 11,287,432

C.

	Test Year	2010 Incurred	2009 Incurred	2008 Incurred	2007 Incurred	2006 Incurred
General STI	9,763,030	14,049,238	9,056,096	8,435,707	4,175,869	6,829,433

	Test Year	2010	2009	2008	2007	2006
RSU Distributions	1,524,402	1,218,778	787,080	564,500	1,473,304	878,772
TOTAL INCENTIVES	11,287,432	15,268,016	9,843,176	9,000,207	5,649,173	7,708,205



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Thursday, October 27, 2011
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Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-17 :: Incentive compensation programs
Date: 0000-00-00

Question 1 (Prepared by Jim Armstrong)
Please provide a description of all incentive compensation programs provided to officers. For each program, please provide a) a description of the program, b) the performance criteria factors used to determine awards, c) the amount included in the Company's claim, and d) the actual amount incurred in each of the past five years.

Response:
a and b) Please refer to KCC-62 for description of the incentive plans and the criteria factors used to determine awards. c and d) The attached spreadsheet shows the amounts actually incurred in each of the past five years as well as the level of such expense reflected in Westar's pro forma test year cost-of-service.

Attachment File Name	Attachment Note
CURB 17 incentives incurred.xlsx	

Westar Energy
Docket No. 12-WSEE-112-RTS

CURB-17

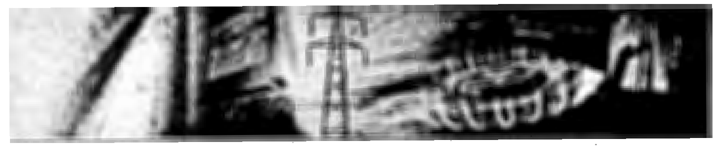
A. See response to KCC-62 for plan descriptions

B. 6,476,893

C.

	Test Year	2010	2009	2008	2007	2006
RSU Distributions	6,476,893	9,451,095	3,716,936	3,343,224	3,641,703	2,059,006

energytools, llc. DATA REQUEST EASY ACCESS MANAGEMENT SYSTEM



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Thursday, October 27, 2011
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Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-20 :: SERP benefits
Date: 0000-00-00

Question 1 (Prepared by Jim Armstrong)
Fully describe any SERP benefits and quantify any SERP costs included in the Company's filing and describe how the Company's claim for SERP costs was determined.

Response:
See the attached spreadsheet.

Attachment File Name	Attachment Note
CURB DR-20.xlsx	

Westar Energy, Inc.
CURB-20 Supplemental Executive Retirement Plan
2010 Rate Review

SERP BENEFITS:

Acct #	Account Name		Cost included in filing 4/1/10-3/31/11	How Determined?
9260014	Executive Salary Continuation Plan	(1)	1,566,677.31	Actuarially determined by Towers Watson
9260025	Restoration Plan	(2)	228,051.00	Actuarially determined by Towers Watson
9260033	WCNOC Non-Qualified SERP Expense	(3)	193,769.22	Actuarially determined by Towers Watson

(1) This plan was implemented in the mid-1980's with the last participant entry in approximately 2001 - there will be no future entrants into this plan. The purpose of the plan was to provide specified benefits to highly compensated employees who contribute materially to the continued growth, development and future business success of the Company. This plan covers 37 former employees and 2 current employees and provides monthly benefits as a life annuity.

(2) This plan was established effective April 2, 2010 and was established by the Company solely for the purpose of providing benefits in excess of the limiatations on benefits imposed by the Internal Revenue Code on qualified retirement plans for certain of its executive officers who participate in the Westar Energy, Inc. Retirement Plan.

(3) Wolf Creek SERP covers seven former executive employees and provides monthly benefits as a life annuity.

energytools, llc. DATA REQUEST EASY ACCESS MANAGEMENT SYSTEM

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Thursday, December 29, 2011
Logged in as: [**Andrea Crane**] Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-25 :: Deferred Pension
Date: 0000-00-00

Question 1 (Prepared by Jim Armstrong)
Please explain why the Company did not provide any workpapers in support of its Deferred Pension Expense Amortization adjustment, IS-10 (this tab is empty).

Response:
The Adjustment IS-10 workpapers are attached

Attachment File Name	Attachment Note
CURB DR-25 Adjustment IS-10 workpaper.xlsx	

Westar Pension
Contribution and Expense Trackers

Line Nos.			Defined in KCC Application	2009	2010	2011
1	(a)	Gross Cost	"GAAP Pension/OPEB Cost"	27,923,462	32,364,002	47,231,801
2	(b)	Net GAAP expense	"Pension/OPEB Expense"	19,861,669	22,840,832	33,239,760
3	(c)	Expense in Rates		10,673,948	10,673,948	10,673,948
4	(d)	Required Funding Level	equals "GAAP Pension/OPEB Cost"	19,861,669	22,840,832	33,239,760
5	(e)	Actual cash contributions		37,303,818	22,400,000	50,000,000
6		Contribution Tracker Increases	Difference if (e) > (a)	9,380,356	-	2,768,199
7		Contribution Tracker Decreases	Difference if (e) < (d)	-	(440,832)	-
8		Cumulative Contribution Tracker	(Reg Asset account 1823575)	9,380,356	8,939,524	11,707,723
9						
10		Expense Tracker	Difference of (b) - (c)	9,187,721	12,166,884	22,565,812
11		Cumulative Expense Tracker	(Reg Asset account 1823570)	9,187,721	21,354,605	43,920,417

WCNOC

			Defined in KCC Application	2009	2010	2011
12	(a)	Gross Cost	"GAAP Pension/OPEB Cost"	7,302,170	8,184,758	9,775,212
13	(b)	Net GAAP expense	"Pension/OPEB Expense"	5,321,296	5,874,856	7,016,452
14	(c)	Expense in Rates		4,376,624	4,376,624	4,376,624
15	(d)	Required Funding Level	equals "Pension/OPEB Expense"	5,321,296	5,874,856	7,016,452
16	(e)	Actual cash contributions (calendar year)		7,309,843	6,044,256	10,009,819
17		Contribution Tracker Increases	Difference if (e) > (a)	7,673	-	234,607
18		Contribution Tracker Decreases	Difference if (e) < (d)	-	-	-
19		Cumulative Contribution Tracker	(Reg Asset account 1823585)	7,673	7,673	242,280
20		Expense Tracker	Difference of (b) - (c)	944,672	1,498,232	2,639,828
21		Cumulative Expense Tracker	(Reg Asset account 1823580)	944,672	2,442,904	5,082,732

Westar OPEB
Contribution and Expense Trackers

POST RETIREMENT MEDICAL (106):

Line No.			Defined in KCC Application	2009	2010	2011
1	(a)	Gross Cost	"GAAP Pension/OPEB Cost"	9,143,913	9,799,023	10,733,366
2	(b)	Net GAAP expense	"Pension/OPEB Expense"	6,503,971	6,915,641	7,546,389
3	(c)	Expense in Rates		8,783,816	8,783,816	8,783,816
4	(d)	Required Funding Level	equals "GAAP Pension/OPEB Expense"	6,503,971	6,915,641	7,546,389
5	(e)	Actual cash contributions		9,143,913	9,799,023	10,733,366
6		Contribution Tracker Increases	Difference if (e) > (a)	-	-	-
7		Contribution Tracker Decreases	Difference if (e) < (d)	-	-	-
8		Cumulative Contribution Tracker		-	-	-
9		Expense Tracker	Difference of (b) - (c)	(2,279,845)	(1,868,175)	(1,237,427)
10		Cumulative Expense Tracker		(2,279,845)	(4,148,020)	(5,385,447)

LONG-TERM DISABILITY (112):

Line No.			Defined in KCC Application	2009	2010	2011
11	(a)	Gross Cost (Towers) (9260011)	"GAAP Pension/OPEB Cost"	(390,630)	(800,827)	(3,544,423)
12	(b)	Net GAAP expense (4073018)	"Pension/OPEB Expense"	(277,851)	(565,182)	(2,505,444)
13	(c)	Expense in Rates		976,141	976,141	976,141
14	(d)	Required Funding Level	equals "GAAP Pension/OPEB Expense"	(277,851)	(565,182)	(2,505,444)
15	(e)	Actual cash contributions		293,309	85,076	500,000
16		Contribution Tracker Increases	Difference if (e) > (a)	293,309	85,076	500,000
17		Contribution Tracker Decreases	Difference if (e) < (d)	-	-	-
18		Cumulative Contribution Tracker		293,309	378,385	878,385
19		Expense Tracker	Difference of (b) - (c)	(1,253,992)	(1,541,323)	(3,481,585)
20		Cumulative Expense Tracker		(1,253,992)	(2,795,315)	(6,276,900)

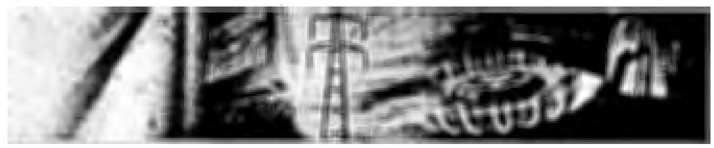
COMBINED FAS 106/112:

		Defined in KCC Application	2009	2010	2011
(a)	Gross Cost (Towers) (9260011)	"GAAP Pension/OPEB Cost"	8,753,283	8,998,196	7,188,943
(b)	Net GAAP expense (4073018)	"Pension/OPEB Expense"	6,226,120	6,350,459	5,040,945
(c)	Expense in Rates		9,759,957	9,759,957	9,759,957
(d)	Required Funding Level	equals "GAAP Pension/OPEB Expense"	6,226,120	6,350,459	5,040,945
(e)	Actual cash contributions		9,437,222	9,884,099	11,233,366
	Contribution Tracker Increases	Difference if (e) > (a)	683,939	885,903	4,044,423
	Contribution Tracker Decreases	Difference if (e) < (d)	-	-	-
	Cumulative Contribution Tracker		683,939	1,569,842	5,614,265
	Expense Tracker	Difference of (b) - (c)	(3,533,837)	(3,409,498)	(4,719,012)
	Cumulative Expense Tracker		(3,533,837)	(6,943,335)	(11,662,347)

WESTAR ENERGY, INC.
Revenue Requirement Support
Test Year Ended 03/31/2011
Amortization of Net Deferred Pension Costs
Deferred Pension Amortization Expense

Line No.					
1	Westar Pension	Cumulative Expense Tracker Balance	(Reg Asset account 1823570)	$	43,920,417
2	WCNOC	Cumulative Expense Tracker Balance	(Reg Asset account 1823580)	$	5,082,732
3	COMBINED FAS 106/112	Cumulative Expense Tracker Balance	(Reg Liability account 2544000)	$	(11,662,347)
4		Net Deferral		$	37,340,802
5		3 Year Amortization		$	12,446,934

energytools, llc. Data Request Easy Access Management System



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Thursday, October 27, 2011
Logged in as: **[Marjorie Levin]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-39 :: Previous rate case filings
Date: 0000-00-00

Question 1 (Prepared by Mike Heim)
For each of the past three rate case filings, provide: a) the amount of the increase requested, b) the percentage increase requested, c) the amount of increase granted, d) whether the case was litigated or settled, e) the total rate case costs incurred, and f) the effective date of new rates.

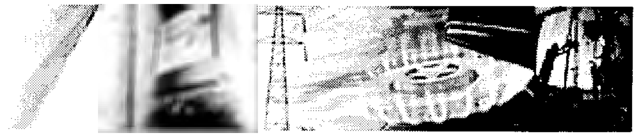
Response:
Please see attached work sheet "CURB DR 39 prior rate cases". It includes the requested information for the three prior general rate case filings and the abbreviated filing made in 2009.

Attachment File Name	Attachment Note
CURB_DR_39_prior_rate_cases.xls	

CURB DR 39

	abbreviated 09-WSEE-925-RTS	08-WSEE-1041-RTS	05-WSEE-981-RTS		01-WSRE-436-RTS 02-WSRE-301-RTS	bi-furcated
a) amount of increase requested	$ 19,700,000	$ 177,623,380	$ 84,145,725		$ 150,506,206	
b) percent increase requested	1.5%	15%	7.5%	(1)	12.10%	
c) amount of increase granted	$ 17,116,219	$ 130,000,000	$ 2,897,189		$ (22,751,580)	
d) litigated or settled	settled	settled	litigated		litigated	
e) rate case costs incurred	$ 59,637	$ 739,732	$ 2,206,447		$ 2,552,119	
f) effective date	1-Feb-10	3-Feb-09	27-Jan-06		4-Jun-02	
			2-Mar-06	* after reconsideration		
			29-Aug-07	* after remand		
			9% WEN - 6% WES	(1)		

energytools, llc. DATA REQUEST EASY ACCESS MANAGEMENT SYSTEM



Home Page Change Password

Friday, December 30, 2011

Logged in as: **[Andrea Crane]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-40: :: Consultants
Date: 0000-00-00

Question 1 (Prepared by Jim Armstrong)
Provide a copy of all contracts with consultants or other third parties for rate case services claimed in this filing.

Response:
Attached to the DREAM system are copies of four (4) contracts with consultants Westar has engaged for the purpose of assisting Westar in this rate review. The contracts will not be provided in paper format as collectively the contracts are quite large.

Attachment File Name	Attachment Note
CURB-40 contract 1 .pdf	
CURB-40 contract 2 .pdf	
CURB-40 contract 3 .pdf	
CURB-40 contract 4 .pdf	

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WESTAR ENERGY, INC.
SERVICES CONTRACT

THIS CONTRACT, made this 1st day of March, 2011, between **WESTAR ENERGY, INC.**, a Kansas corporation, (hereinafter "Company") and James Armstrong of Edmond, Oklahoma (hereinafter "Contractor") (collectively referred to as the "Parties" or individually as "Party"):

For Good and Valuable Consideration, and subject to all terms and conditions of this Contract and all exhibits thereto, the Parties agree as follows:

1. **CONTRACT DOCUMENTS.** "Contract" means this written agreement between Company and Contractor, any amendments hereto, any plans, specifications, change orders, Contract Addenda, Contract Job Releases, Service Request Tickets, Authorizations to Complete Work under Contract, Schedule of Work to be Done, Schedule of Payments, and other documents attached hereto or by reference made a part hereof.

2. **PERFORMANCE, TERM AND SAFETY.**

a. This is a nonexclusive master contract issued in the total dollar amount stated on the Schedule of Payment. No work is guaranteed to Contractor hereunder and Contractor shall be utilized only as needed by Company. With the exception of materials supplied by Company, if any, as provided in the Schedule of Work to be Done attached hereto, marked Attachment 1 and made a part hereof, Contractor agrees to furnish all necessary labor, materials and equipment required to perform, to the reasonable satisfaction of Company, all work described in the Schedule of Work to be Done. The term of this Contract begins on the date referenced above, unless delayed due to force majeure as set forth in Section 21 of this Contract, and ends on March 1, 2013, unless earlier terminated by one of the Parties as provided herein. Upon completion of the term of this Contract, Company shall have the option to extend this Contract by providing written notice to Contractor no later than 30 days prior to the end of the then-current Contract term.

b. Prior to commencing any work hereunder, Contractor shall furnish Company a detailed time schedule setting forth the dates on which it expects to start and to complete each portion of the work and the procedures to be followed. Contractor shall also furnish actual daily, weekly, or monthly reports of progress as requested by Company. If Contractor fails, in Company's opinion, to furnish the necessary labor, material or equipment or fails to progress in a timely manner, Company shall so notify Contractor in writing and request provision of additional labor, materials or equipment, or overtime. Contractor shall comply with such requests at its sole expense. Company reserves the right to contract with other contractors in order to avoid delay of the work under this Contract. Company shall direct the coordination of all work among various contractors. In the event any conflicts arise between contractors regarding the coordination of the work, Company will make the final decision resolving the conflict. Company reserves the right to use its own employees or to issue separate contracts to other parties providing for labor and materials. Contractor shall cooperate with all other contractors performing work on behalf of Company on this project, and shall conduct its operations to prevent interference with the work or progress of such contractors.

c. Company agrees to provide assistance by placing at Contractor's disposal all available information pertinent to the work including previous reports and any other data relative thereto. Contractor shall rely upon information made available by Company as accurate without independent verification. Contractor's failure to complete the work or to complete the work within the allotted time or for the dollar amount stated shall be deemed an event of default with respect to Contractor under Section 20.

d. SAFETY COMPLIANCE - Contractor, its employees and its subcontractors who perform work at Company-designated sites shall meet or exceed all safety and health protection as required by Company's policies. All of said workers, whether regularly involved in routine site operations or engaged in temporary projects such as construction or repair, must follow the safety and health policies of the Company, which policies shall be communicated by Company to Contractor, whether orally or in writing. Contractor shall be subject to removal of any of the Contractor's employees or subcontractors for violation of the Company's safety or health policies. Contractor shall report all employee OSHA recordable accidents and those of its subcontractors to Company within 24 hours of the incident. Investigation report and written mitigation steps shall be provided, in a form satisfactory to Company, within 72 hours of incident unless an extension is agreed to by Company. Notification to Company will be to the attention of:

ATTACHMENT 1

Schedule of Work to be Done

Contractor shall provide assistance in preparing and defending rate review, as well as implementation of rates or accounting issues arising out of rate review.

All information and communications in connection with the work covered by this Contract shall be treated as confidential. No information, except information otherwise generally available to the public, shall be disclosed to any individual, corporation, or person other than those specifically designated by the Company in connection with each specific assignment.

ATTACHMENT 2

Schedule of Payment

In consideration for Contractor's strict adherence to the terms and conditions of the Contract and subject to Contractor's performance of the work set forth in Attachment 1, Schedule of Work to be Done, to the satisfaction of Company's authorized representative, Company agrees to pay Contractor an amount computed from the following rate schedule.

Monthly Rate	$17,500.00
Per Diem	Company will pay Contractor an amount not to exceed $2,500 a month for meals and lodging

Invoices will be rendered to Company on a monthly basis. Invoices are due and payable within 30 days of the date of the invoice. All applicable sales tax shall be itemized separately and added to the invoice. The Contract Number must appear on all invoices related to this Contract. Invoices shall be submitted to:

Westar Energy, Inc.
Attention: Dick Rohlfs
P.O. Box 889
Topeka, KS 66601

The total amount to be paid to Contractor in performance of this Contract shall not exceed **FOUR HUNDRED EIGHTY THOUSAND DOLLARS ($480,000.00)**. The final invoice shall be accompanied by Affidavit Form 151-4 from Contractor.

WESTAR ENERGY, INC.
CONTRACT

THIS CONTRACT, made this 1 day of November, 2007, between WESTAR ENERGY, INC., a Kansas corporation, (hereinafter "Company") and Energytools, LLC of Bethesda, Maryland, (hereinafter "Contractor") (collectively referred to as the "Parties" or individually as "Party"):

For Good and Valuable Consideration, and subject to all terms and conditions of this Contract and all exhibits thereto, the Parties agree as follows:

1. **CONTRACT DOCUMENTS.** "Contract" means this written agreement between Company and Contractor, any amendments hereto, any plans, specifications, change orders, Contract Addenda, Contract Job Releases, Service Request Tickets, Authorizations to Complete Work under Contract, Schedule of Work to be Done, Schedule of Payments, and other documents attached hereto or by reference made a part hereof.

2. **PERFORMANCE AND TERM.**

a. This is a nonexclusive master contract issued in the total dollar amount stated on the Schedule of Payment. No work is guaranteed to Contractor hereunder and Contractor shall be utilized only as needed by Company. With the exception of materials supplied by Company, if any, as provided in the Schedule of Work to be Done attached hereto, marked Attachment 1 and made a part hereof, Contractor agrees to furnish all necessary labor, materials and equipment required to perform, to the reasonable satisfaction of Company, all work described in the Schedule of Work to be Done. The term of this Contract begins on the date referenced above, unless delayed due to force majeure as set forth in Section 20 of this Contract, and ends on March 31, 2009, unless earlier terminated by one of the Parties as provided herein. Upon completion of the term of this Contract, Company shall have the option to extend this Contract by providing written notice to Contractor no later than 30 days prior to the end of the then-current Contract term.

b. Prior to commencing any work hereunder, Contractor shall furnish Company a detailed time schedule setting forth the dates on which it expects to start and to complete each portion of the work and the procedures to be followed. Contractor shall also furnish actual daily, weekly, or monthly reports of progress as requested by Company. If Contractor fails, in Company's opinion, to furnish the necessary labor, material or equipment or fails to progress in a timely manner, Company shall so notify Contractor in writing and request provision of additional labor, materials or equipment, or overtime. Contractor shall comply with such requests at its sole expense. Company reserves the right to contract with other contractors in order to avoid delay of the work under this Contract. Company shall direct the coordination of all work among various contractors. In the event any conflicts arise between contractors regarding the coordination of the work, Company will make the final decision resolving the conflict. Company reserves the right to use its own employees or to issue separate contracts to other parties providing for labor and materials. Contractor shall cooperate with all other contractors performing work on behalf of Company on this project, and shall conduct its operations to prevent interference with the work or progress of such contractors.

c. Company agrees to provide assistance by placing at Contractor's disposal all available information pertinent to the work including previous reports and any other data relative thereto. Contractor shall rely upon information made available by Company as accurate without independent verification. Contractor's failure to complete the work or to complete the work within the allotted time or for the dollar amount stated shall be deemed an event of default with respect to Contractor under Section 20.

3. **VENDOR/CONTRACTOR CODE OF BUSINESS CONDUCT AND ETHICS AGREEMENT.** Contractor and Company are each committed to legal compliance and ethical business practices, in their relationship with each other and in all of their operations. Accordingly, Contractor shall be provided and shall execute acknowledgement of receipt of Company's Vendor/Contractor Code of Business Conduct and Ethics Agreement, which Agreement and signed Receipt and Acknowledgement shall be attached hereto as **Attachment 3** and incorporated herein in its entirety.

4. **PROFESSIONAL RESPONSIBILITY; WARRANTY.**

a. Notwithstanding any other provision of this Contract to the contrary, Contractor will exercise reasonable skill, care and diligence in the performance of Contractor's services and will carry out its responsibilities in accordance with customarily accepted good practices within Contractor's profession or industry. If Contractor fails to meet the foregoing standard, Contractor will perform at its own cost, and without reimbursement from Company, the professional services

ATTACHMENT 1

Schedule of Work to be Done

Contractor shall furnish all labor, tools, equipment, materials, expenses and supervision necessary to perform a class cost of service analysis for Westar Energy and Kansas Gas and Electric Company. Where appropriate, it is expected the Consultant conducting the analysis will recommend approaches to cost allocation appropriate for cost recovery from the classes of customers. The Consultant may be required to submit expert testimony to the Kansas Corporation Commission, respond to information requests and support his analysis and recommendations. In addition, the Consultant is expected to consider the current and changing theories and methodologies related to cost recovery. In addition, Consultant may be asked to assist in preparing Company's overall revenue requirement, assist in preparation of adjustments, provide guidance on rate design and other related projects.

ATTACHMENT 2

Schedule of Payment

In consideration for Contractor's strict adherence to the terms and conditions of the Contract and subject to Contractor's performance of the work set forth in Attachment 1, Schedule of Work to be Done, to the satisfaction of Company's authorized representative, Company agrees to pay Contractor an amount computed from Exhibit A, Schedule of Units.

Billing increment to be agreed on by Company and Contractor prior to start of any work. All applicable sales tax shall be itemized separately and added to the invoice. The Contract Number must appear on all invoices related to this Contract. Invoices shall be submitted to:

Westar Energy
Attention: Dick Rohlfs
P.O. Box 889
Topeka, KS 66601

The total amount to be paid to Contractor in performance of this Contract shall not exceed **Three Hundred Thousand Dollars (\$300,000.00)**. The final invoice shall be accompanied by a completed and notarized copy of Affidavit Form 151-4 from Contractor and each subcontractor used by Contractor in the completion of the work.

EXHIBIT A

Schedule of Units

Contractor shall provide consulting services as described in Attachment 1, Schedule of Work to be Done, per the following:

Hourly Rate	$250.00

WESTAR ENERGY, INC.
SERVICES CONTRACT

THIS CONTRACT, made this 1st day of February, 2011, between **WESTAR ENERGY, INC.**, a Kansas corporation, (hereinafter "Company") and **The Prime Group** of Crestwood, Kentucky (hereinafter "Contractor") (collectively referred to as the "Parties" or individually as "Party"):

For Good and Valuable Consideration, and subject to all terms and conditions of this Contract and all exhibits thereto, the Parties agree as follows:

1. **CONTRACT DOCUMENTS.** "Contract" means this written agreement between Company and Contractor, any amendments hereto, any plans, specifications, change orders, Contract Addenda, Contract Job Releases, Service Request Tickets, Authorizations to Complete Work under Contract, Schedule of Work to be Done, Schedule of Payments, and other documents attached hereto or by reference made a part hereof.

2. **PERFORMANCE, TERM AND SAFETY.**

a. This is a nonexclusive master contract issued in the total dollar amount stated on the Schedule of Payment. No work is guaranteed to Contractor hereunder and Contractor shall be utilized only as needed by Company. With the exception of materials supplied by Company, if any, as provided in the Schedule of Work to be Done attached hereto, marked **Attachment 1** and made a part hereof, Contractor agrees to furnish all necessary labor, materials and equipment required to perform, to the reasonable satisfaction of Company, all work described in the Schedule of Work to be Done. The term of this Contract begins on the date referenced above, unless delayed due to force majeure as set forth in Section 21 of this Contract, and ends on **January 31, 2014**, unless earlier terminated by one of the Parties as provided herein. Upon completion of the term of this Contract, Company shall have the option to extend this Contract by providing written notice to Contractor no later than 30 days prior to the end of the then-current Contract term.

b. Prior to commencing any work hereunder, Contractor shall furnish Company a detailed time schedule setting forth the dates on which it expects to start and to complete each portion of the work and the procedures to be followed. Contractor shall also furnish actual daily, weekly, or monthly reports of progress as requested by Company. If Contractor fails, in Company's opinion, to furnish the necessary labor, material or equipment or fails to progress in a timely manner, Company shall so notify Contractor in writing and request provision of additional labor, materials or equipment, or overtime. Contractor shall comply with such requests at its sole expense. Company reserves the right to contract with other contractors in order to avoid delay of the work under this Contract. Company shall direct the coordination of all work among various contractors. In the event any conflicts arise between contractors regarding the coordination of the work, Company will make the final decision resolving the conflict. Company reserves the right to use its own employees or to issue separate contracts to other parties providing for labor and materials. Contractor shall cooperate with all other contractors performing work on behalf of Company on this project, and shall conduct its operations to prevent interference with the work or progress of such contractors.

c. Company agrees to provide assistance by placing at Contractor's disposal all available information pertinent to the work including previous reports and any other data relative thereto. Contractor shall rely upon information made available by Company as accurate without independent verification. Contractor's failure to complete the work or to complete the work within the allotted time or for the dollar amount stated shall be deemed an event of default with respect to Contractor under Section 20.

d. **SAFETY COMPLIANCE** - Contractor, its employees and its subcontractors who perform work at Company-designated sites shall meet or exceed all safety and health protection as required by Company's policies. All of said workers, whether regularly involved in routine site operations or engaged in temporary projects such as construction or repair, must follow the safety and health policies of the Company, which policies shall be communicated by Company to Contractor, whether orally or in writing. Contractor shall be subject to removal of any of the Contractor's employees or subcontractors for violation of the Company's safety or health policies. Contractor shall report all employee OSHA recordable accidents and those of its subcontractors to Company within 24 hours of the incident. Investigation report and written mitigation steps shall be provided, in a form satisfactory to Company, within 72 hours of incident unless an extension is agreed to by Company. Notification to Company will be to the attention of:

ATTACHMENT 1

Schedule of Work to be Done

Consultant shall perform tasks needed by the Company to verify the accuracy of Company's monthly Generation Formula Rate Energy Charge calculation. Such tasks shall be agreed to before they are performed.

ATTACHMENT 2

Schedule of Payment

In consideration for Contractor's strict adherence to the terms and conditions of the Contract and subject to Contractor's performance of the work set forth in Attachment 1, Schedule of Work to be Done, to the satisfaction of Company's authorized representative, Company agrees to pay Contractor an amount computed from the following rate schedule:

	Hourly Rate
Steve Seelye	$200.00
John Wolfram	$150.00
Larry Feltner	$150.00
Jeff Wernert	$150.00
Paul Garcia	$150.00

Contractor shall submit itemized invoices to the Company for payment. All applicable sales tax shall be itemized separately. The Contract Number must appear on all invoices related to this Contract. Invoices shall be submitted to:

Westar Energy
Attention: Robert Oakes
P.O. Box 889
Topeka, KS 66601

The total amount to be paid to Contractor in performance of this Contract shall not exceed **Fifty Thousand Dollars ($50,000.00)**. The final invoice shall be accompanied by a completed and notarized copy of Affidavit Form 151-4 (provided herewith).

WESTAR ENERGY, INC.
SERVICES CONTRACT

THIS CONTRACT, made this 1st day of March, 2011, between **WESTAR ENERGY, INC.**, a Kansas corporation, (hereinafter "Company") and Foster Associates, Inc. of Fort Myers, Florida (hereinafter "Contractor") (collectively referred to as the "Parties" or individually as "Party"):

For Good and Valuable Consideration, and subject to all terms and conditions of this Contract and all exhibits thereto, the Parties agree as follows:

1. **CONTRACT DOCUMENTS.** "Contract" means this written agreement between Company and Contractor, any amendments hereto, any plans, specifications, change orders, Contract Addenda, Contract Job Releases, Service Request Tickets, Authorizations to Complete Work under Contract, Schedule of Work to be Done, Schedule of Payments, and other documents attached hereto or by reference made a part hereof.

2. **PERFORMANCE, TERM AND SAFETY.**

a This is a nonexclusive master contract issued in the total dollar amount stated on the Schedule of Payment. No work is guaranteed to Contractor hereunder and Contractor shall be utilized only as needed by Company. With the exception of materials supplied by Company, if any, as provided in the Schedule of Work to be Done attached hereto, marked **Attachment I** and made a part hereof, Contractor agrees to furnish all necessary labor, materials and equipment required to perform, to the reasonable satisfaction of Company, all work described in the Schedule of Work to be Done. The term of this Contract begins on the date referenced above, unless delayed due to force majeure as set forth in Section 21 of this Contract, and ends on September 30, 2012, unless earlier terminated by one of the Parties as provided herein. Upon completion of the term of this Contract, Company shall have the option to extend this Contract by providing written notice to Contractor no later than 30 days prior to the end of the then-current Contract term.

b. Prior to commencing any work hereunder, Contractor shall furnish Company a detailed time schedule setting forth the dates on which it expects to start and to complete each portion of the work and the procedures to be followed. Contractor shall also furnish actual daily, weekly, or monthly reports of progress as requested by Company. If Contractor fails, in Company's opinion, to furnish the necessary labor, material or equipment or fails to progress in a timely manner, Company shall so notify Contractor in writing and request provision of additional labor, materials or equipment, or overtime. Contractor shall comply with such requests at its sole expense. Company reserves the right to contract with other contractors in order to avoid delay of the work under this Contract. Company shall direct the coordination of all work among various contractors. In the event any conflicts arise between contractors regarding the coordination of the work, Company will make the final decision resolving the conflict. Company reserves the right to use its own employees or to issue separate contracts to other parties providing for labor and materials. Contractor shall cooperate with all other contractors performing work on behalf of Company on this project, and shall conduct its operations to prevent interference with the work or progress of such contractors.

c. Company agrees to provide assistance by placing at Contractor's disposal all available information pertinent to the work including previous reports and any other data relative thereto. Contractor shall rely upon information made available by Company as accurate without independent verification. Contractor's failure to complete the work or to complete the work within the allotted time or for the dollar amount stated shall be deemed an event of default with respect to Contractor under Section 20.

d. SAFETY COMPLIANCE - Contractor, its employees and its subcontractors who perform work at Company-designated sites shall meet or exceed all safety and health protection as required by Company's policies. All of said workers, whether regularly involved in routine site operations or engaged in temporary projects such as construction or repair, must follow the safety and health policies of the Company, which policies shall be communicated by Company to Contractor, whether orally or in writing. Contractor shall be subject to removal of any of the Contractor's employees or subcontractors for violation of the Company's safety or health policies. Contractor shall report all employee OSHA recordable accidents and those of its subcontractors to Company within 24 hours of the incident. Investigation report and written mitigation steps shall be provided, in a form satisfactory to Company, within 72 hours of incident unless an extension is agreed to by Company. Notification to Company will be to the attention of:

ATTACHMENT 1

Schedule of Work to be Done

Consultant shall conduct a depreciation study of Westar Energy, Inc. and Kansas Gas and Electric's electric utility property.

The depreciation study is to be a complete and thorough review of Westar's current capital recovery program with respect to its electric utility properties using procedures and methods consistent with Industry Standards and Practices. Where appropriate, it is expected Consultant will recommend changes in practices related to the capital recovery program to reflect current and projected operating conditions of Westar's electric utility operations. Consultant is expected to consider the current and changing accounting conditions impacting the accounting for costs and activities related to property, plant and equipment.

Consultant will meet periodically with Westar to discuss progress and interim findings.

ATTACHMENT 2

Schedule of Payment

In consideration for Contractor's strict adherence to the terms and conditions of the Contract and subject to Contractor's performance of the work set forth in Attachment 1, Schedule of Work to be Done, to the satisfaction of Company's authorized representative, Company agrees to pay Contractor an amount computed according to the following rate schedule:

Dr. Ronald E. White	\$350.00/hour
Dr. Kimbugwe A. Kateregga	\$275.00/ hour
Support Staff	\$115.00/hour

Out-of-pocket expenses for activities such as travel or communications will be billed at Contractor's cost.

Contractor shall submit itemized invoices to the Company for payment. All applicable sales tax shall be itemized separately. The Contract Number must appear on all invoices related to this Contract. Invoices shall be submitted to:

Westar Energy
Attention: Dick Rohlfs
P.O. Box 889
Topeka, KS 66601

The total amount to be paid to Contractor in performance of this Contract shall not exceed **Two Hundred Thousand Dollars (\$200,000.00)**. The final invoice shall be accompanied by a completed and notarized copy of Affidavit Form 151-4 (provided herewith).

energytools, llc. DATA REQUEST EASY ACCESS MANAGEMENT SYSTEM

Home Page Change Password

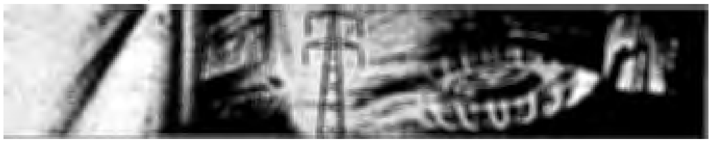
Friday, December 30, 2011
Logged in as: [**Andrea Crane**] Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-41 :: Requests for proposal
Date: 0000-00-00

Question 1 (Prepared by Jim Armstrong)
Please provide copies of all Requests for Proposal issued by or on behalf of Westar with regard to the provision of rate case services in this case.

Response:
Westar did not issue any Requests for Proposal in conjunction with the current rate case filing.

No Digital Attachments Found.



Home Page Change Password

Thursday, October 27, 2011
Logged in as: **[Marjorie Levin]** Logout

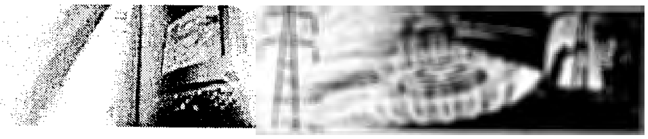
Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-49 :: Meal expenses
Date: 0000-00-00

Question 1 (Prepared by Mike Stadler)
Provide the amount of meals expenses included in the test year but disallowed for tax purposes.

Response:
The amount of pro forma meal expenses included in the test year but disallowed for tax purposes is $474,471.

No Digital Attachments Found.

energytools, llc. Data Request Easy Access Management System



Home Page Change Password

Monday, January 02, 2012

Logged in as: **[Andrea Crane]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-72 :: Collected from rate payers
Date: 0000-00-00

Question 1 (Prepared by Mike Heim)

Regarding page 18 of Mr. Ruelle's testimony, since the 2005 rate filing, please provide, by year, the amount collected from ratepayers relating to each of the Company's clauses or surcharge mechanisms, e.g., RECA, TDC, etc.

Response:

Please see attached file for the revenues recovered from riders since the 2005 rate filing.

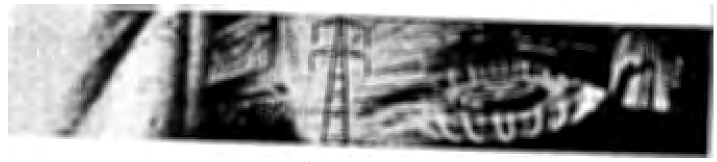
Attachment File Name	Attachment Note
CURB DR 72 revenues from riders.xlsx	

CURB data request 72

	RECA	TDC	ECRR	PTS	EER
2006	$ 232,640,622.55	$ 54,285,632.03	$ 833,844.07	$ 8,039,764.64	
2007	$ 252,681,619.14	$ 53,410,166.84	$ 3,445,969.47	$ (3,854,643.13)	
2008	$ 367,029,679.91	$ 65,810,369.17	$ 16,934,055.20	$ (3,712,135.55)	
2009	$ 337,590,067.43	$ 93,274,276.91	$ 20,677,936.01	$ (7,050,218.53)	
2010	$ 366,327,912.63	$ 116,820,742.37	$ 40,786,543.16	$ (4,505,025.19)	$ 720,449.47
YTD August 2011	$ 280,640,286.76	$ 86,694,950.77	$ 35,275,765.15	$ 513,883.33	$ 4,034,304.24

RECA Retail Energy Clause Adjustment
TDC Transmission Delivery Charge
ECRR Environmental Cost Recovery Rider
PTS Property Tax Surcharge
EER Energy Efficiency Rider

energytools, llc. DATA REQUEST EASY ACCESS MANAGEMENT SYSTEM



Home Page Change Password

Wednesday, October 19, 2011
Logged in as: **[Marjorie Levin]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-89 :: Short-term debt
Date: 0000-00-00

Question 1 (Prepared by John Grace)
Regarding page 56, lines 1-4 of Mr. Ruelle's testimony, does Westar utilize short-term debt? If so, please provide the average short-term outstanding and average cost of that debt, for each month of the test year.

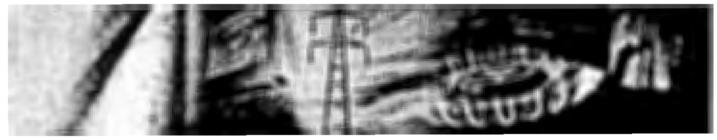
Response:
Yes, Westar utilizes short-term debt. Please see attached.

Attachment File Name	Attachment Note
Curb 89 Short term debt.XLS	

Westar Energy, Inc.
Short-term Debt Activity
For the test year ending March 31, 2011

DR: CURB-89

Line #	Period	(a) Average Balance	(b) Interest and Fees	(c) Average Cost of Debt
1	4/30/2010	$ 227,046,000	$ 190,161	1.02%
2	5/31/2010	240,809,677	211,597	1.03%
3	6/30/2010	236,859,333	213,695	1.10%
4	7/31/2010	283,340,645	242,476	1.01%
5	8/31/2010	223,692,645	206,307	1.09%
6	9/30/2010	151,994,000	160,415	1.28%
7	10/31/2010	153,643,871	165,178	1.27%
8	11/30/2010	138,706,167	154,109	1.35%
9	12/31/2010	194,016,129	183,584	1.11%
10	1/31/2011	283,407,871	226,186	0.94%
11	2/28/2011	275,947,857	215,665	1.02%
12	3/31/2011	263,913,548	313,395	1.40%



Home Page Change Password

Wednesday, October 19, 2011
Logged in as: **[Marjorie Levin]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-90 :: Capital amounts
Date: 0000-00-00

Question 1 (Prepared by John Grace)
Please provide the most recent capital amounts, percentages, and cost rates for Westar Energy. Please include long-term debt, common equity, preferred stock, and short-term debt.

Response:
Please see the attached files. Included are the updated cost of long-term debt, and updated balances of long-term debt, common equity, preferred equity, and short-term debt with related costs.

Attachment File Name	Attachment Note
CURB 90 Capital Amounts 09.30.11.xlsx	
CURB 90 COC Study 9.30.11.XLS	

Westar Energy, Inc.
DR: CURB 90 - Capital Amounts
As of 9/30/2011

Line #	(a)	(b) 9/30/2011 Balance	(c) Cost
1	Long-Term Debt	$ 2,495,002,500	6.6531%
2	Preferred Equity	21,436,300	4.5529%
3	Common Equity	2,587,865,634	10.6000%
4	Short-Term Debt	391,900,000	1.1748%

YTM Method LTD Only

WESTAR ENERGY, INC. and KANSAS GAS and ELECTRIC COMPANY
Combined Electric Operations
Cost of Debt
As of September 30, 2011

Line No.	Description Col. 1	Date of Offering Col. 2	Date of Maturity Col. 3	Interest Rate Col. 4	Principal Amount of Issue Col. 5	Net Proceeds (b) Col. 6	Yield to Maturity Col. 7	Outstanding Debt Capital (d) Col. 8	Cost of Debt Col. 9	Weighted Cost of Debt Col. 10	Net Premium, Discount & Expense Col. 11	Net Proceeds as Percent of Original Issue
1	WR 6.10% Series due 2047	05/16/2007	05/15/2047	6.1000%	$ 150,000,000	$ 142,106,922	6.4687%	150,000,000	$ 9,703,037		$ 7,893,078	94.737948%
2	KGE 6.53% Series due 2037	10/15/2007	12/15/2037	6.5300%	175,000,000	173,937,727	6.5756%	175,000,000	11,507,337		1,062,273	99.392987%
3	KGE 5.30% Series due 2031	06/10/2004	06/01/2031	5.3000%	108,600,000	101,882,902	5.7541%	108,600,000	6,248,955		6,717,098	93.814827%
4	KGE 5.30% Series due 2031	06/10/2004	06/01/2031	5.3000%	18,900,000	17,678,933	5.7754%	18,900,000	1,091,542		1,221,067	93.539328%
5	KGE 4.85% Series due 2031	06/10/2006	06/01/2031	4.8500%	50,000,000	45,688,762	5.4882%	50,000,000	2,744,110		4,311,238	91.377524%
6	KGE 5.60% Series due 2031	08/26/2008	06/01/2031	5.6000%	50,000,000	45,827,198	6.2939%	50,000,000	3,146,930		4,172,802	91.654396%
7	KGE 5.00% Series due 2031	10/15/2009	06/01/2031	5.0000%	50,000,000	44,789,494	5.8552%	50,000,000	2,927,620		5,210,506	89.578988%
8	KGE 6.0% series due 2031	10/10/2008	06/01/2031	6.0000%	50,000,000	44,591,337	6.9546%	50,000,000	3,477,308		5,408,663	89.182673%
9	WR 5.0% Series due 2033	06/01/2004	02/01/2033	5.0000%	58,340,000	50,666,524	5.9623%	57,245,000	3,413,133		7,673,476	86.846974%
10	WR 6.00% Series due 2014	06/17/2004	07/01/2014	6.0000%	250,000,000	233,038,164	6.9495%	250,000,000	17,373,820		16,961,836	93.215266%
11	KGE 5.10% Series due 2023	03/01/1994	03/01/2023	5.1000%	13,982,500	13,297,590	5.4376%	13,317,500	724,150		684,910	95.101665%
12	WR MATES Series due 2032 (a)	04/28/1994	04/15/2032	0.4708%	45,000,000	43,694,021	0.5557%	45,000,000	250,066		1,305,979	97.097824%
13	WR MATES Series due 2032 (a)	04/28/1994	04/15/2032	0.4045%	30,500,000	29,576,046	0.4921%	30,500,000	150,086		923,954	96.970643%
14	KGE MATES Series due 2027(a)	04/28/1994	04/15/2027	0.4250%	21,940,000	20,763,492	0.6047%	21,940,000	132,672		1,176,508	94.637613%
15	KGE MATES Series due 2032(a)	04/28/1994	04/15/2032	0.4328%	14,500,000	14,015,257	0.5301%	14,500,000	76,863		484,743	96.656946%
16	KGE MATES Series due 2032(a)	04/28/1994	04/15/2032	0.4498%	10,000,000	9,647,351	0.5529%	10,000,000	55,286		352,649	96.473508%
17	WR 5.15% Series due 2017	01/18/2005	01/01/2017	5.1500%	125,000,000	106,085,018	7.0432%	125,000,000	8,803,987		18,914,982	84.868014%
18	WR 5.95% Series due 2035	01/18/2005	01/01/2035	5.9500%	125,000,000	104,978,768	7.2694%	125,000,000	9,086,810		20,021,232	83.983014%
19	WR 5.10% Series, due 2020	06/30/2005	07/15/2020	5.1000%	250,000,000	231,117,562	5.8622%	250,000,000	14,655,606		18,882,438	92.447025%
20	WR 5.875% Series, due 2036	06/30/2005	07/15/2036	5.8750%	150,000,000	137,292,242	6.5140%	150,000,000	9,770,975		12,707,758	91.528161%
21	KGE 6.15% Series due 2023 (f)	05/15/2008	05/15/2023	6.1500%	50,000,000	49,549,841	6.2433%	50,000,000	3,121,659		450,159	99.099682%
22	KGE 6.64% Series due 2038 (g)	05/15/2008	05/15/2038	6.6400%	100,000,000	100,175,656	6.6264%	100,000,000	6,626,442		(175,656)	100.175656%
23	WR 8.625% Series due 2018	11/25/2008	12/01/2018	8.6250%	300,000,000	294,968,987	8.8808%	300,000,000	26,642,378		5,031,013	98.322996%
24	KGE 6.70% Series due 2019	06/11/2009	06/15/2019	6.7000%	300,000,000	296,143,443	6.8796%	300,000,000	20,638,823		3,856,557	98.714481%
25	Miscellaneous loss on reacquired debt								149,956 (c)			
26	Put/call option settlement								3,475,639 (e)			
					$ 2,496,762,500	$ 2,351,513,239		$ 2,495,002,500	$ 165,995,191		$ 145,249,261	
1	Weighted Average Cost of Debt Capital:									**6.6531%**		

Notes:
(a) Variable rate security, interest rates are based on rates as of date in heading plus weighted basis points for broker fees.
(b) Includes adjustments for losses on reacquired debt (call premium and unamortized debt expenses) associated with replaced issues.
(c) Annualized cost for loss on reacquired debt for issues not specifically refinanced.
(d) Represents debt balances on a consolidated basis.
(e) Cost of option settlement of $65.8MM less gains on bonds of $13.7MM, and amortized over 15 years (the remaining life of the original bonds if they had been remarketed.)

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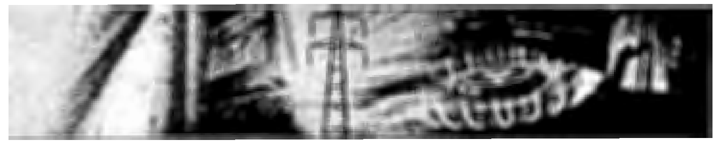

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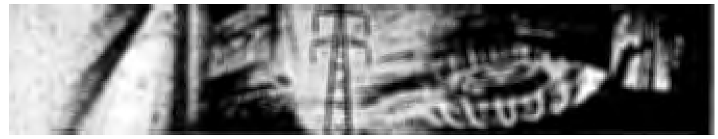
Monday, October 24, 2011
Logged in as: **[Marjorie Levin]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-116 :: Fuel oil
Date: 0000-00-00

Question 1 (Prepared by Kevin Kongs)
Regarding the sales of No. 6 fuel oil discussed on page 8 of Mr. Kongs' testimony, please provide a complete description of the factors giving rise to this sale, and state if such sales are routinely made by the Company.

Response:
Effective January 1, 2014, in accordance with our Regional Haze Agreement with the Environmental Protection Agency (EPA) and the Title V Operating permits for Gordon Evans Energy Center, Hutchinson Energy Center, Neosho Energy Center and Murray Gill Energy, we are only allowed to burn natural gas at the aforementioned plants with limited exceptions. In addition, we are required to reduce our existing supply of No. 6 fuel oil and replace it with any fuel oil within prescribed limits. In order to meet the required inventory levels, we sold a portion of our No. 6 fuel oil during the test year . The sale of No. 6 fuel oil was unusual in nature and was only made to comply with new requirements prescribed by the EPA.

No Digital Attachments Found.



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Wednesday, October 19, 2011
Logged in as: **[Marjorie Levin]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [CURB] [David Springe]
Data Request: CURB-130 :: Vegetation management
Date: 0000-00-00

Question 1 (Prepared by Caroline Williams)
Please provide the actual vegetative management costs incurred in each of the past ten years.

Response:
Please see the attached spreadsheet. Jeff

Attachment File Name	Attachment Note
DR CURB- 130, Question 1 Line Clearance O&M Historical Statistics 2001 thru 2010 20111017.xlsx	

Westar Energy Inc. **Line Clearance O&M Historical Statistics**

DR Title: CURB-130: Vegetation Management, Question 1 10/17/2011

Dollars	2001	2002	2003	2,004	2,005	2006	2007	2008	2009	2010
Expenditures										
Distribution	$11,744,062	$12,986,075	$12,810,778	$15,946,137	$16,228,750	$18,268,132	$18,617,135	$14,115,829	$14,862,143	$19,734,834
34.5 KV	$1,011,171	$738,326	$294,138	$469,267	$618,612	$880,317	$1,937,363	$849,788	$832,282	$1,148,557
69 KV and Higher	$2,804	$49,365	$18,807	$89,267	$48,745	$4,050,984	$3,887,471	$4,084,411	$3,950,793	$2,291,437
Total	$12,758,037	$13,773,766	$13,123,723	$16,504,671	$16,896,107	$23,199,433	$24,441,969	$19,050,028	$19,645,218	$23,174,828

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Monday, January 02, 2012

Logged in as: **[Andrea Crane]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Jeff McClanahan]
Data Request: KCC-38 :: Abnormal or Non-recurring charges or credits
Date: 0000-00-00

Question 1 (Prepared by Kevin Kongs)
List each abnormal or non-recurring charge or credit, which occurred during the test year, exceeding $100,000 (individually or in aggregate for any area or project). Please state whether each was a charge or credit and the associated basis and dollar magnitude of each.

Response:
See the attached file that contains abnormal or non-recurring charges or credits, which occurred during the test year, exceeding $100,000 (individually or in aggregate for any area or project).

Attachment File Name	Attachment Note
KCC-38 Abnormal or Non-recurring Charges or Credits.xlsx	

Westar Energy, Inc.
Response to KCC-38: Abnormal or Non-recurring Charges or Credits
For the Test Year Ended March 31, 2011

Schedule of Non-recurring Charges or Credits

Date	Description	Account	Dr (+) Cr (-) Amount
4/2010	Storm Mutual Aid Assistance - Mid American	4081110	$ (16,743.08)
4/2010	Storm Mutual Aid Assistance - Mid American	4081112	(1,746.23)
4/2010	Storm Mutual Aid Assistance - Mid American	5840002	(34.78)
4/2010	Storm Mutual Aid Assistance - Mid American	5930000	(278,930.00)
4/2010	Storm Mutual Aid Assistance - Mid American	9250000	(269.14)
4/2010	Storm Mutual Aid Assistance - Mid American	9260000	(12,648.46)
4/2010	Storm Mutual Aid Assistance - Mid American	4081110	(14,977.05)
4/2010	Storm Mutual Aid Assistance - Mid American	4081112	(1,562.05)
4/2010	Storm Mutual Aid Assistance - Mid American	5930000	(253,481.21)
4/2010	Storm Mutual Aid Assistance - Mid American	9250000	(182.00)
4/2010	Storm Mutual Aid Assistance - Mid American	9260000	(8,553.56)
4/2010	Storm Mutual Aid Assistance - American Electric Power	4081110	(31,929.64)
4/2010	Storm Mutual Aid Assistance - American Electric Power	4081112	(3,330.07)
4/2010	Storm Mutual Aid Assistance - American Electric Power	5930000	(514,810.63)
4/2010	Storm Mutual Aid Assistance - American Electric Power	9250000	(342.67)
4/2010	Storm Mutual Aid Assistance - American Electric Power	9260000	(16,105.22)
4/2010	Storm Mutual Aid Assistance - American Electric Power	4081110	(32,285.67)
4/2010	Storm Mutual Aid Assistance - American Electric Power	4081112	(3,367.19)
4/2010	Storm Mutual Aid Assistance - American Electric Power	5930000	(496,055.31)
4/2010	Storm Mutual Aid Assistance - American Electric Power	9250000	(341.35)
4/2010	Storm Mutual Aid Assistance - American Electric Power	9260000	(16,042.55)
7/2010	Storm Mutual Aid Assistance - A&G	9200000	(140,589.53)
7/2010	Storm Mutual Aid Assistance - A&G	9260009	(109,915.45)
7/2010	Storm Mutual Aid Assistance - A&G	9210000	(5,112.35)
9/2010	Record Estimated Ventex Settlement	5660001	250,000.00
11/2010	Record Reg Asset for Demand Response Rider Bill Credit	4400003	(1,278,212.00)
11/2010	Record Reg Asset for Demand Response Rider Bill Credit	4421003	(1,365,610.00)
11/2010	Record Reg Asset for Demand Response Rider Bill Credit	4422003	(997,806.00)
			$ (5,350,983.19)

DATA REQUEST EASY ACCESS MANAGEMENT SYSTEM
energytools, llc.

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Monday, January 02, 2012
Logged in as: **[Andrea Crane]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Jeff McClanahan]
Data Request: KCC-62 :: Employee benefits-Exec. or mgmt incentive plans
Date: 0000-00-00

Question 1 (Prepared by Greg Musick)
1. A complete list of titles that are eligible to receive bonuses or incentive pay under the management or executive incentive plan. 2. Information on how an individual becomes eligible for the plan. 3. Comprehensive written description of the plan including when established.

Response:
Question #1 A file including a list of participating titles for each incentive plan is attached. Question #2 Participants in all of Westar Energy's short-term incentive plans (STI) must be employed in a regular (full or part-time), nonunion position during the performance period. Officers, temporary employees and contractors are excluded from participation in STI. Energy Marketing Incentive Plan - Beginning in 2010, only positions directly involved in trading or energy marketing participate in the Energy Marketing Incentive Plan. These jobs are identified by their inclusion in the Energy Marketing Pay Structures (Grades ET1 - ET9). All other nonunion Energy Marketing Unit personnel participate in the broader Westar Energy STI plan. Prior to 2010, all nonunion positions in Energy Marketing except a few positions strictly focused on utility operations participated in the Energy Marketing Incentive Plan. Major Construction STI - When this plan was created in 2007, it applied to only a few key positions within the Generation Construction work group. Remaining employees participated in the broader Westar Energy STI plan. Beginning in 2008, the Generation Construction STI was extended to the entire work group. Westar Energy STI - All nonunion employees who do not participate in either the Energy Marketing Incentive Plan or the Generation Construction STI participate in the Westar Energy STI. Additionally, employees who have retired during the performance period are considered for incentives. Westar Energy Long-term Incentives: - All officers and all employees in positions graded in Pay Grades A1-C, 7ET, 8ET, or 9ET on the date of the annual grant of Restricted Share Units (RSUs) participate. Question #3 Plan documents describing the Energy Marketing Incentive Plan, the Generation Construction STI, and the Westar Energy STI are attached. The current Westar Energy STI Plan Design was first applied to the 2006 performance year. The Energy Marketing Incentive Plan has been in existence since 1998; however, the plan's current design was first used for the 2006 performance year. The Generation Construction STI was initially put in place for a few key employees in that work group for the 2007 performance year, and then expanded to the rest of that group in 2008. There have been annual incentives for non-officer employees in various forms since 1997. The Long-Term Incentive and Share Award Plan have been in effect since 1996. Incentives are currently distributed under this plan in either through annual grants or as a part of the Energy Marketing Incentive Plan. In all cases, participants receive dividend equivalent rights (DERs) for all unvested RSUs. These DERs are cash payments equal to the value of actual dividends paid each quarter for a number of shares of common stock equal to the number of unvested RSUs. 1. Company officers and employees in positions in grades A1 through C, 9ET, 8ET, and 7ET are eligible for annual grants of RSUs. These grants must be approved by the Board each year. The size of the grants generally reflect the difference between median market total direct compensation and target cash compensation, although for officers the size of these grants are reviewed on an individual basis and may reflect consideration of other variables. The RSUs granted each year to an individual have a three-year vesting period. Half of the RSUs vest solely on time, that is, all of these time-based RSUs will vest if employment continues through the vesting date. The other half of the RSUs granted are performance-based, i.e., the number of RSUs that actually vest on the vesting date is determined by Westar's Total Shareholder Return (TSR) relative to the TSR of a group of peer utilities. Examples of the attached RSU agreements for both time-based and performance-based RSUs provide detailed explanation of the provisions of these grants. 2. RSUs are granted to a portion of the participants in the Energy Marketing Incentive Plan. A copy of this plan is attached. The terms of these RSU grants is explained in the section pertaining to Incentive Disbursements.

Attachment File Name	Attachment Note
2010 Westar Energy STI Plan Document.doc	
2011 Major Const STI Plan Signed.pdf	
2011 Plan Signed.pdf	
2011 Westar Energy STI Plan Document.doc	
BLANK 2011 A-C Performance RSU Award.pdf	
BLANK 2011 A-C Time Based RSU Award.pdf	
Titles Participating in Incentive Plans.xls	

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2011 Westar Energy Short-term Incentive Plan

Employee contribution is a key component in the success of the company. The 2011 Westar Energy Short-term Incentive Plan (Plan) is intended to provide recognition of that contribution and to establish a linkage between the outcomes of the shareholders and employees. The Plan focuses employee efforts on operating the utility in a safe and reliable manner, providing high quality electric energy service at a reasonable cost to all customers, and earning a fair return for our investors.

Plan Year and Administration of the Plan

The Plan is effective January 1, 2011 through December 31, 2011. This Plan is not a contract or guarantee and is subject to change by the Company from time to time. The Company in its sole discretion shall interpret the Plan. The Chief Executive Officer shall appoint a committee to be responsible for administering the Plan, interpreting the Plan, selecting the Participants, determining eligibility requirements, determining whether actual individual compensation awards will be paid and making other pertinent decisions regarding the administration of the plan. The decisions of the committee shall be final and binding.

Eligibility

This plan applies to all non-bargaining unit employees in pay grades A1 through V. To be eligible to receive an incentive, the participant must be employed with the company in a non-bargaining unit position during 2011 and on the date of payment unless termination is due to retirement. If termination is due to retirement, the retiree will be considered for a prorated incentive payment based on performance and the proportion of the 2011-year worked prior to retirement. Any employee who becomes eligible for the plan after January 1, 2011 will be eligible for a prorated amount. Payouts from the plan will be made by March 15, 2011.

Overview

An incentive pool is created separately for each major business unit. Each employee in the business unit has a "target" incentive that is stated as a percent of the employee's base pay. The "target" incentive pool is the sum of the "target" incentives of the employees in the business unit. A payout percentage is determined by performance on various measures, some of which are measured at the level of the entire company and some are measured at the business unit level. The "target" incentive pool is multiplied by the payout percentage to determine the actual incentive pool. This actual pool of incentive funds are allocated out to individuals by the executives in the business unit.

Incentive Pools

Separate incentive pools will be developed for employees in each business unit. The targeted size of each pool is determined by multiplying the payroll of the positions in each pay grade by the incentive target of the grade. Actual incentive pools will be a proportion of the targeted pool based on results on the performance measures described below.

Incentive Targets

The incentive targets for each pay grade are shown in the following table.

Grade	Incentive Target as % of Base Salary
A'	25%
A-B	20%
C	15%
D-E	10%

F-G	7%
H-V	5%

These incentive targets are used to develop incentive pools. The actual incentive received by an individual employee is likely to vary from this target based on higher or lower performance.

Performance Components

For the 2011 Plan, there will be four major areas of performance measurement: 1) financial 2) business unit specific operational targets, 3) customer satisfaction, and 4) safety.
Each of these components has a weight and a maximum payout. For example, assume an employee was in Grade F with an overall incentive target of 7% of base pay. The weight and maximum payout percentage for the financial component is 50% and 200% respectively. Then, for this employee, the target incentive for the financial component 3.5% (50% times 7%) and the maximum payout that could be earned from this measure is 7% (200% times 3.5% = 7%).

The following table shows the weight and maximum payout percentage for each measure by business unit.

	Financial	Operational	Cust. Satisfaction	Safety
Weights				
Corporate (1)	50%	25%	15%	10%
Dist Power Delivery	50%	25%	10%	15%
Generation	50%	25%	10%	15%
Marketing	50%	25%	10%	15%
Operations Strategy & Supp	50%	25%	10%	15%
Transmission & Envir.	50%	25%	10%	15%
Public Aff. & Consumer Svc	50%	20%	15%	15%
Maximum Payout Percentage	200%	150%	150%	150%

(1) Corporate includes Corporate Compliance and Internal Audit, Finance and Accounting, Human Resources, Information Technology, Legal, and Regulatory.

Performance Measures

(1) Financial Component – This component is measured by comparing Westar Energy's Total Shareholder Return (TSR) for the performance year to the TSR of other electric utilities in the peer group of companies shown in the appendix of this plan. TSR is defined as change in stock price plus dividends divided by the starting stock price. In order to avoid the impact of the dramatic fluctuations in stock price that can occur on any given day, the starting price is calculated using an average of stock prices over the month of December preceding the start of the plan year and the ending price using an average of stock prices over the month of December at the end of the plan year. The following table shows the percent of the target payout that will be paid for each level of performance. Performance between these points will be interpolated. Performance is stated in terms of Westar TSR as a percentile of the index. A payout of 200% of the targeted financial payout is the maximum possible payout for this component.

Westar TSR Percentile	% of Financial Target Paid
0	0%
25th	0%
37.5th	25%

50^{th}	100%
70^{th}	175%
90^{th}	200%

Example:
The overall targeted incentive for Grade F is 7% of base salary. Since the Financial Component carries a weight of 50%, the targeted incentive for this component for all Grade F employees is 3.5% (weight of 50% times 7% overall target). If Westar ended the year in the 70^{th} percentile of the EEI Peer Group, the incentive associated with this measure would be calculated by multiplying the 3.5% times the payout percentage of 175%, which equals 6.125%. This means that 6.125% of the annual payroll for all Grade F employees would be placed in the incentive pool for each Business Unit.

(2) Operational Objectives – Each business unit establishes annual objectives that support the unit's business plan. Each objective is weighted and scored by the executive in charge of the unit on the following measurement scale.

Unit Performance Rating	% of Incentive Target
Below Expectations	0%
Meets Expectations	100%
Exceeds Expectations	125%
Significantly Exceeds Expectations	150%

Example:
The overall targeted incentive for Grade F is 7% of base salary. Assuming the Operational Component carried a weight of 20%, the targeted incentive for this component for all Grade F employees in this business unit is 1.4% (weight of 20% times 7% overall target).

If the business unit had four operational goals, the following table describes the associated calculation.

Goal	Weight	Performance	Payout %	Weighted Score
Goal 1	10%	Below	0%	0%
Goal 2	30%	Meets	100%	30%
Goal 3	30%	Exceeds	125%	37.5%
Goal 4	30%	Outstanding	150%	45%
		Component Score =		112.50%

In this example, the component incentive target for Grade F employees of 1.4% of base salary would be multiplied by 112.5% and 1.575% of the annual payroll of Grade F employees in this business unit would go into the incentive pool.

(3) Customer Satisfaction – This component is measured through a customer transaction survey administered to a proportional sample of customers who have transacted business with Westar during the performance period. The survey is administered three waves throughout the year (spring, summer, and fall) and a composite score is calculated. A target and a maximum score is established at the beginning of the year. The incentive associated with this measure pays 0% of the incentive target at any score below target, 100% at the target score, and 150% at or above the maximum score.

Example:
The target score for 2011 is 83.8. The maximum score is 84.8. If the actual score was 84.3 (halfway between the target and maximum) 125% of the incentive would be paid out. The overall targeted incentive for Grade F is 7%. Assuming the weight of the Customer Satisfaction component is 15%, the targeted incentive for Grade F would be 1.05%. In this example, the component incentive target for Grade F employees of 1.05% of base salary would be multiplied by 125% and 1.3125% of the annual payroll of Grade F employees in this business unit would go into the incentive pool.

(4) Safety – The safety component is split into two separate measures, OHSA Incident Rate and DART rate. The OHSA Incident rate is calculated based on the number of OHSA recordable injuries in a business unit. The DART rate is calculated based on the number of Lost Time and Restricted Duty injuries in a business unit. The following business unit specific measures have been developed for each business unit in 2011. Please note that the 2011 safety record as of January 31 of the following year will be the basis for these measures.

2011 OSHA Incident Rate Targets

Unit	Target	Maximum
Corporate	0.5	0.1
Public Affairs & Consumer Services	2.33	1.25
Operations Strategy & Support	1.78	0.9
Distribution Power Delivery	2.33	1.25
Transmission & Environmental	0	0
Marketing	0	0
Generation	2.04	0.96

2011 DART Rate Targets

Unit	Target	Maximum
Corporate	0.15	0
Public Affairs & Consumer Services	1.41	0.66
Operations Strategy & Support	1.03	0.46
Distribution Power Delivery	1.41	0.66
Transmission & Environmental	0	0
Marketing	0	0
Generation	0.72	0.25

2011 PVA Targets

Unit	Target	Maximum
Corporate	0	0
Public Affairs & Consumer Services	3.5	2.8
Operations Strategy & Support	2.75	2
Distribution Power Delivery	3.5	2.8
Transmission & Environmental	2.75	0
Marketing	0	0
Generation	3.5	2.8

Performance above target pays no incentive (the lower the score the better the performance). Performance at target pays 100% of the targeted incentive. Performance at the maximum pays 150% of the target.

Example:
If the actual OSHA Incident rate were 2.5, the target 3.0, and the maximum 2.0, 125% of the incentive associated with this measure would be earned. The overall targeted incentive for Grade F is 7%. Assuming the weight of the OSHA Incident Rate measure is 7.5% the targeted incentive for Grade F would be 0.525%. In this example, the measure incentive target for Grade F employees of 0.525% of base salary would be multiplied by 125% and 0.65625% of the annual payroll of Grade F employees in this business unit would go into the incentive pool.

Individual Incentives

Business unit executives will allocate the pools of incentive funds for their unit to individual employees. This allocation will be based on an assessment of each employee's relative contribution.

WESTAR ENERGY
1996 LONG-TERM INCENTIVE AND SHARE AWARD PLAN

PERFORMANCE RESTRICTED SHARE UNITS AWARD

Name:	«Label_Name»
Target Award:	«RSUs_Per_Award»
Grant Date:	February 23, 2011
Performance Period	January 1, 2011 through December 31, 2013

Westar Energy, Inc. (the "Company") hereby grants to you «RSUs_Per_Award» Restricted Share Units pursuant to the Company's 1996 Long-Term Incentive and Share Award Plan (as amended) (the "Plan"), a copy of which has been delivered to you and made a part hereof, subject to the following terms and conditions and the terms and conditions of the Plan. The number of Restricted Share Units granted under this paragraph is referred to in this Award as the "Target Award." The terms used in this Award shall have the same meaning as in the Plan, unless the context requires otherwise, and except that "Restricted Share Units" shall refer only to the Restricted Share Units granted under this Award.

1. Restricted Share Units. Subject to the terms and conditions hereof and as contained in the Plan, each Restricted Share Unit earned by you in accordance with Section 3 below, shall represent the right to receive one share of the Company's common stock.

2. Vesting. The Restricted Share Units earned by you in accordance with Section 3 below shall vest on January 2, 2014 (the "Vesting Date") if your employment continues uninterrupted through such date.

3. Performance Criteria and Adjustment of Target Award.

   (a) The Target Award to be earned by you shall be adjusted upward or downward based upon the Company's "Total Shareholder Return" (as defined below) compared to Total Shareholder Return for the "Peer Group" (as defined below) during the performance period indicated above (the "Performance Period"), as shown in the following chart:

Company Total Shareholder Return Relative to Peer Group:	Payout as Percentage of Target Award
90th percentile or above	200%
50th percentile	100%
25th percentile	25%

Interpolation shall be used to determine the payout as a percentage of the Target Award if the Company's performance falls between the percentiles shown. You shall not receive any portion of the Target Award if the Company's Total Shareholder Return during the Performance Period is below the 25th percentile. You shall receive 200% of the Target Award if the Company's Total Shareholder Return during the Performance Period ranks at the 90th percentile or above.

(b) Total Shareholder Return shall be determined by the following formula: Total Shareholder Return equals Ending Stock Price minus Beginning Stock Price plus Dividends Paid, divided by Beginning Stock Price.

Beginning Stock Price shall mean the average closing price on the applicable stock exchange of one share of stock for the calendar month immediately preceding the first day of the Performance Period.

Ending Stock Price shall mean the average closing price on the applicable stock exchange of one share of stock for the calendar month in which the last day of the Performance Period occurs.

Dividends Paid shall mean the total of all dividends paid on one share of stock during the Performance Period.

(c) The Company's percentile rank shall be determined by listing from highest Total Shareholder Return to lowest Total Shareholder Return, each company in the Peer Group, including the Company. The highest company would have a 100 percentile rank and the lowest company would have a zero percentile rank. Each company in between would have a percentile rank equal to 100 divided by N minus 1 (100/(N-1)), where N is the total number of companies in the Peer Group, plus the percentile rank of the company below it.

(d) The Peer Group consists of the companies listed on Exhibit A attached to this Award. Companies that cease to be publicly traded during the Performance Period shall be removed from the Peer Group for purposes of measuring the Company's relative performance. The Committee (as defined in the Plan) reserves the right to add one or more companies to the Peer Group if the number of companies in the Peer Group decreases below twelve during the Performance Period

4. Dividend Equivalents.

(a) Each Restricted Share Unit earned by you in accordance with Section 3 above includes the right to receive dividend equivalents in an amount equal to the amount of the cash dividends that you would have received if you owned the number of shares of the Company's common stock represented by such Restricted Share Unit during the Performance Period or the portion of such period until such Restricted Share Units are forfeited pursuant to Section 7 below, and such dividend equivalents shall be accrued and paid to you following the end of the Performance Period as provided in Section 5 below.

(b) If during the Performance Period any shares of the Company's common stock or other property (other than cash) are distributed to holders of the Company's common stock in a pro rata distribution other than as a result of a stock split, you shall be entitled to receive the number of shares of the Company's common stock or the other property that you would have received if you owned the number of shares of the Company's common stock represented by the Restricted Share Units earned by you in accordance with Section 3 above, and such shares or other property shall be paid to you following the end of the Performance Period as provided in Section 5 below.

(c) If during the Performance Period any shares of the Company's common stock are distributed to holders of the Company's common stock as a result of a stock split, your Target Award shall be increased by a number of additional Restricted Share Units equal to the number of shares of the Company's common stock that you would have received if you owned the number of shares of the Company's common stock represented by your Target Award. Such additional Restricted Share Units shall be subject to the same terms, conditions and restrictions as the original Restricted Share Units covered by this Award.

5. Payment and Withholding.

(a) As soon as administratively practicable following, but in no event later than thirty days of, the Vesting Date, either certificate(s) evidencing the shares of the Company's common stock represented by those Restricted Share Units you have earned in accordance with Section 3 above shall be delivered to you (without any legend to reflect terms, conditions and restrictions hereunder) or such shares shall be credited to an account maintained for you, and dividend equivalents and other distributions will be paid to you.

(b) In the case of your death, shares to be delivered or credited pursuant to subsection (a) above following vesting pursuant to Section 6 below, shall instead be made to the beneficiary designated in writing by you pursuant to a form of designation provided by the Company, or, if none, to your estate.

(c) The Company, if required, shall withhold taxes, at a rate not to exceed the minimum statutory rate, on any income realized in connection with the payment of Restricted Share Units or dividend equivalents.

6. Termination of Employment. Except as provided below in this Section 6, you shall be eligible for payment of awarded Restricted Share Units, as determined in Section 3, only if your employment with the Company continues uninterrupted through the Vesting Date set forth in Section 2 above.

(a) If your employment terminates prior to the Vesting Date on account of your death or Disability (as defined below), your Target Award shall be prorated based on the number of days from the grant date to the date of termination of your employment, and the prorated Target Award (and related dividend equivalents) shall be adjusted as provided in Section 3 above based on the Company's Total Shareholder Return for the entire Performance Period, and paid following the Vesting Date as provided in Section 5 above. For purposes of this Award, the term "Disability" means, on a basis of medical evidence, that you are prevented from any comparable employment with the Company.

(b) If your employment terminates prior to the Vesting Date on account of your Retirement (as defined below), your Target Award shall be prorated based on the number of days from the grant date to the date of termination of your employment, and the prorated Target Award (and related dividend equivalents) shall be adjusted as provided in Section 3 above based on the Company's Total Shareholder Return for the entire Performance Period, and paid following the Vesting Date as provided in Section 5 above. For purposes of this Award, the term "Retirement" means your cessation of services as an employee of the Company on or after the attainment of 60 years of age and 10 years of "Service" as defined in the Westar Energy, Inc. Retirement Plan.

7. Forfeiture of Restricted Share Units. If your employment terminates for any reason other than those described in Section 6 above prior to the Vesting Date, all of the Restricted Share Units shall be forfeited, and you shall have no further right to receive any benefits or payments under this Award.

8. Rights as Shareholder. Prior to the Vesting Date, you shall have none of the rights of a shareholder of the Company with respect to the shares of the Company's common stock represented by the Restricted Share Units. You shall, however, have the right to receive dividend equivalents as described in Section 4 above. In addition, if shares of the Company's common stock are held under a "rabbi trust" (the assets of which are

subject to claims of the Company's creditors in the event of the Company's insolvency) established to assist the Company in meeting its obligations under this and other restricted share unit awards, you may (at the Company's sole discretion) be given the right prior to the Vesting Date to direct the trustee as to the voting of a number of shares held by the trustee corresponding to the Target Award.

9. Nontransferability. Except by will or by the laws of descent and distribution, you may not sell, transfer, assign, pledge or otherwise encumber or dispose of any Restricted Share Units nor may you sell, transfer, assign, pledge, encumber or dispose of any of the shares of the Company's common stock represented by your Restricted Share Units prior to the payment of such shares to you pursuant to Section 5.

10. Unsecured Creditor Status. This Award constitutes a mere promise by the Company to pay you the benefits described in this Award (to the extent vested). You shall have the status of a general unsecured creditor of the Company with respect to any benefits payable under this Award.

11. Change of Control. Section 8(a)(i) of the Plan shall apply to the Restricted Share Units covered by this Award, except that you shall be entitled to receive your Target Award adjusted as provided in Section 3 above, and for such purposes Total Shareholder Return shall be calculated with Ending Stock price meaning the average closing price on the applicable stock exchange of one share of stock for the twenty trading days immediately prior to the effective date of the Change of Control, and the Performance Period shall end on the effective date of the Change of Control. Certificate(s) evidencing the shares of the Company's common stock represented by the Restricted Share Units shall be delivered to you (without any legend to reflect terms, conditions and restrictions hereunder) or such shares shall be credited to an account maintained for you, or the consideration to be received upon consummation of the Change of Control shall be paid to you, as soon as administratively practicable following, but in no event later than thirty days of, the effective date of the Change of Control. Section 8(a)(ii) of the Plan shall not apply to the Restricted Share Units covered by this Award.

12. Committee Authority. Any questions concerning the interpretation of this Award, including without limitation any adjustments under Section 4(c) of the Plan (relating to Share splits, reorganizations, mergers, spin-offs and other corporate transactions and events), and any controversy which arises under this Award shall be settled by the Committee, as defined in the Plan, in its sole discretion.

13. Inconsistencies. The terms of this Award are governed by the terms of the Plan and in the case of any inconsistency between the terms of this Award and the terms of the Plan, the terms of the Plan shall control. By signing this Award letter, you acknowledge receipt of a copy of the Plan.

14. Governing Law. The provisions of this Award shall be governed by the laws of the State of Kansas without giving effect to principles of conflict of laws.

WESTAR ENERGY, INC.

By: ______________________________________

Name: Mark A. Ruelle

Title: EXECUTIVE VICE PRESIDENT and CHIEF FINANCIAL OFFICER

AGREED TO:

____

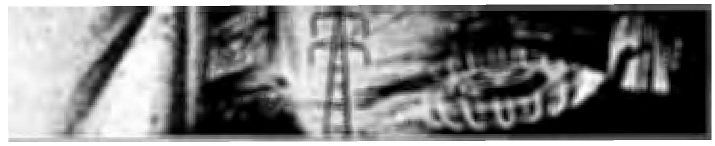
Name: «Label_Name»

Title: «Job_Title»

Exhibit A

Alliant Energy Corp.
Ameren Corp.
Avista Corp.
Black Hills Corp.
Cleco Corp.
DPL Inc.
Great Plains Energy Inc.
IDACORP Inc.
Northwestern Corp.
NSTAR
NV Energy Inc.
Pinnacle West Capital Corp.
PNM Resources Inc.
Portland General Electric Co.
TECO Energy Inc.
Unisource Energy Corp.
Wisconsin Energy Corp.

energytools, llc. DATA REQUEST EASY ACCESS MANAGEMENT SYSTEM



Home Page Change Password

Monday, October 24, 2011
Logged in as: **[Marjorie Levin]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Kristina Luke]
Data Request: KCC-169 :: Dues
Date: 0000-00-00

Question 1 (Prepared by Kevin Kongs)
Referring to Westar's response to Staff DR # 54, please provide more detail about the journal entries to the following vendors. This detail should include, but not be limited to, the organization's name, why Westar feels it is reasonable to support these organizations, and why Westar believes it is reasonable to include these costs in rates. a. 1/11/11 60.00 Abileneare 3 Tickets for the 2011 Annual b. 12/21&15/10 75.00 Each Onetimeven Associate Member c. 10/20/10 10,000 Topekacomm Heartland Vision 3YR Commitmen d. 1/20/11 2,500 Wichitamet Honors Night Sponsor e. 1/20/11 2,500 Wichitamet Annual Meeting Sponsor

Response:
See the attached file.

Attachment File Name	Attachment Note
KCC-169 Selected Dues Transactions.xlsx	

Westar Energy, Inc.
KCC Date Request No. 169

Item No.	Date of Transaction	Amount		Description for Data Request	Organization Name	Westar's reason to support the organization and why these costs should be included in rates
a.	1/11/2011	60.00		Abileneare 3 Tickets for the 2011 Annual	Abilene Chamber of Commerce	By partnering with our communities, Westar will be a model of civic leadership and environmental stewardship. (Westar's Vision Statement) Westar's interaction with our service communities allows us to communicate issues on both sides and work towards solutions.
b.	12/21/2010	75.00	*	Onetime Association Member	The Apartment Council of Topeka	Energy Efficiency - Watt Saver Program
	12/15/2010	75.00	*	Onetime Association Member	The Apartment Council of Topeka	Westar's membership allows us to educate the council on the benefits of the Watt Saver Program.
c.	10/20/2010	10,000.00		Topekacomm Heartland Visioning 3 Yr Commitment	Heartland Visioning	A 501(c)3 non-profit organization concerned with the future of Topeka's and Shawnee County's economic development. Westar's interaction with our service communities allows us to communicate issues on both sides and work towards solutions.
d.	1/20/2011	2,500.00		Wichitamet Honors Night Sponsor - Gold	1/ Wichita Metro Chamber of Commerce	By partnering with our communities, Westar will be a model of civic leadership and environmental stewardship. (Westar's Vision Statement)
	1/20/2011	2,500.00		Wichitamet Annual Meeting Sponsor - Gold	2/ Wichita Metro Chamber of Commerce	Westar's interaction with our service communities allows us to communicate issues on both sides and work towards solutions.

* The dollar amounts were $175.00.

1/ This event actually took place in March. The various achievements are reconized: corporate, architectural and individual.

2/ This event took place in December. The event recognizes the year's accomplishments and sets the next year's priorities.

Home Page Change Password

Monday, October 24, 2011
Logged in as: **[Marjorie Levin]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Kristina Luke]
Data Request: KCC-174 :: Advertising
Date: 0000-00-00

Question 1 (Prepared by Gina Penzig)
Please provide further explanation of the journal entries below. This should include but not limited to (a) a more detailed description than provided in response to Staff data request No. 50; (b) classification between promotional, safety, educational, etc; (c) provide copies of newspaper ads or scripts of commercials if applicable. a. 10/26/10 20,246.01 (not listed) June Wire 2010 b. 6/8/10 2,219.65 Sullivanhi Welcome Ad c. 6/8/10 500.00 Sullivanhi Leoti Rodeo Sponsoship Ad d. 12/15/10 500.00 Onetimeven Economic Debelopment Guide Spo e. 4/14/11 133.50 Kansaspres E-Clipz Delivery Service f. 5/14/10 2,500.00 Americanhe Sponsor F10 Wichita GRFW g. 8/20/10 1,000.00 Dressforsu 2010 Kansas Women of Distincti h. 9/1/10 1,500.00 (Not Listed) American Heart Association i. 10/15/10 1,500.00 Americanhe Corp Table at Go Red for Women j. 11/30/10 2,682.50 Donlevylit 1000 Dress for Success 2010 TR k. 12/8/10 2,500.00 Botanicawi Illumination Sponsorship l. 12/21/10 3,500.00 Visittopek Holiday Light Tour 2010 Sponso m. 3/21/11 3,450.64 Berrynetwo Feb Charges/Late Fees n. 3/11/11 1,246.57 Sullivanhi Westar Production Materials o. 3/11/11 1,315.00 Sullivanhi Your Relentless Drive Headline

Response:
See the attached Excel spreadsheet file labeled "rate case 2011 dr 174 (1) for the response to (a) and (b). (c) Copies of all newspaper ads or scripts of commercials are provided with CURB-50 data request.

Attachment File Name	Attachment Note
Berry invoice 022011.pdf	
rate case 2011 dr 174(1).xlsx	

berry NETWORK

532251-101

Summary of Account
REMITTANCE PAGE

CORPORATE ID: 31-0920849

CUSTOMER NUMBER	INVOICE	INVOICE DATE	DUE DATE	AMOUNT DUE
0456-9256	427798	26-FEB-2011	25-MAR-2011	~~$23,134.23~~ 3450.64

For questions regarding this bill, please call 800-366-1264 Ext.2526

For questions regarding payments, please call 800-366-1264 Ext.2810

ATTN: Pam Ketter Or Gina Penzig Accts Payable Dept.
Westar Energy
P.O. Box 889
Topeka, KS 66601-0889 USA

PROCESSED

Per Pam Ketter - the vendor did not receive our - BRS

payment until after the due date - BRS

6504
930100000
Yellow

Due to the reduced number of working days, your last payment may not be reflected on your invoice.

in December & if we do not pay late fee it will continue to be on bill - BRS

PLEASE RETURN BOTTOM PORTION OF REMITTANCE PAGE WITH PAYMENT

BILL TO:

ATTN: Pam Ketter Or Gina Penzig Accts Payable Dept.
Westar Energy
P.O. Box 889
Topeka, KS 66601-0889 USA

INVOICE DATE	
26-FEB-2011	
INVOICE NUMBER	
427798	
CUSTOMER NUMBER	
0456-9256	
AMOUNT DUE	**DUE DATE**
$23,134.23	25-MAR-2011

REMIT TO:

BERRY NETWORK, INC.
ATTN: ACCOUNTS RECEIVABLE
P.O. BOX 710909
CINCINNATI, OH 45271-0909

000000000000004277984000231342355

berry NETWORK

ATTN: Pam Ketter Or Gina Penzig Accts Payable Dept.
Westar Energy
P.O. Box 889
Topeka, KS 66601-0889 USA

Invoice Number 427798
Customer Number 0456-9256
Sales ID mobrien

Invoice Date February 26, 2011
Due Date March 25, 2011

Directory Information

Key	Number	Name	Issue	Life	Due Date	Gross	Tax	Adjusted	Paid To Date	Current Due	Past Due	Total Due
	27189	KS Johnson County	11/2010	12R	08/2010	$2,232.00	$.00	$.00	$.00	$.00	$2,232.00	$2,232.00
	27220	KS Wheat State	12/2010	12R	08/2010	$3,181.80	$.00	$.00	$.00	$.00	$3,181.80	$3,181.80
	27229	KS Burlington-Osage Cty	12/2010	12R	08/2010	$714.00	$.00	$.00	$.00	$.00	$714.00	$714.00
	27461	KS Emporia	11/2010	12R	08/2010	$426.00	$.00	$.00	$.00	$.00	$426.00	$426.00
	27461	LATE FEES - KS Emporia	11/2010	12R	08/2010	$6.39	$.00	$.00	$.00	$6.39	$.00	$6.39
	27522	KS Four Co - Chanute KS	12/2010	12R	08/2010	$782.00	$.00	$.00	$.00	$.00	$782.00	$782.00
	27713	KS Northeast Kansas Reg	12/2010	12R	08/2010	$870.00	$.00	$.00	$.00	$.00	$870.00	$870.00
	27988	KS LaHarpe KS	6/2010	12R	03/2010	$2,060.00	$.00	$.00	$.00	$.00	$2,060.00	$2,060.00
	27988	LATE FEES - KS LaHarpe KS	6/2010	12R	03/2010	$30.90	$.00	$.00	$.00	$30.90	$.00	$30.90
	28038	KS Leavenworth-Lansing	11/2010	12R	07/2010	$804.00	$.00	$.00	$.00	$.00	$804.00	$804.00
	28038	LATE FEES - KS Leavenworth-Lan	11/2010	12R	07/2010	$12.06	$.00	$.00	$.00	$12.06	$.00	$12.06
	28297	KS Montgomery County	1/2011	12R	09/2010	$684.00	$.00	$.00	$.00	$.00	$684.00	$684.00
	28348	KS North Central Kansas	1/2011	12R	09/2010	$684.00	$.00	$.00	$.00	$684.00	$.00	$684.00
	28469	KS Ottawa-Paola	11/2010	12R	08/2010	$1,452.00	$.00	$.00	$.00	$.00	$1,452.00	$1,452.00
	28469	LATE FEES - KS Ottawa-Paola	11/2010	12R	08/2010	$21.78	$.00	$.00	$.00	$21.78	$.00	$21.78
	28874	KS Wilson	12/2010	12R	07/2010	$520.80	$.00	$.00	$.00	$.00	$520.80	$520.80

PROCESSED

berry NETWORK

ATTN: Pam Ketter Or Gina Penzig Accts Payable Dept.
Westar Energy
P.O. Box 889
Topeka, KS 66601-0889 USA

Invoice Number 427798
Customer Number 0456-9256
Sales ID mobrien

Invoice Date February 26, 2011
Due Date March 25, 2011

Directory Information

Key	Number	Name	Issue	Life	Due Date	Gross	Tax	Adjusted	Paid To Date	Current Due	Past Due	Total Due
	101989	MO Joplin	1/2011	12R	09/2010	$1,068.00	$.00	$.00	$.00	$1,068.00	$.00	$1,068.00
	103315	KS SKT Southern Kansas	12/2010	12R	08/2010	$2,700.00	$.00	$.00	$.00	$.00	$2,700.00	$2,700.00
	103315	LATE FEES - KS SKT Southern Ka	12/2010	12R	08/2010	$40.50	$.00	$.00	$.00	$40.50	$.00	$40.50
	103979	KS Miami County	1/2011	12R	09/2010	$1,005.00	$.00	$.00	$.00	$1,005.00	$.00	$1,005.00
	103984	KS Shawnee Mission	11/2010	12R	07/2010	$1,185.00	$.00	$.00	$.00	$.00	$1,185.00	$1,185.00
	103984	LATE FEES - KS Shawnee Mission	11/2010	12R	07/2010	$17.77	$.00	$.00	$.00	$17.77	$.00	$17.77
		800-PHONE BILL				$2,636.23	$.00	$.00	$.00	$564.24	$2,071.99	$2,636.23
	23	Transactions				$23,134.23	$.00	$.00	$.00	$3,450.64	$19,683.59	$23,134.23

PROCESSED

Payments Received Since Last Bill

No payment received since last bill.

Current and Past Due Recap

Current Due	1-30 Days	31-60 Days	61-90 Days	90+ Days	Total Late Fees	Total Due
$3,321.24	$9,778.15	$9,905.44	$.00	$.00	$129.40	$23,134.23

+129.40

We owe $3450.64

ARQIHNV - IN

DR 174

	Date	Amount	Vendor	Description	(a) Expanded description	(b) Classification	(c) Copy	Footnote
a.	10/26/2010	$ 20,246.01	SHS	June Wire 2010	The Wire is a quarterly newsletter inserted into customer bills to convey messages about safety, programs, services, etc. This issue focused on how to navigate the automated phone line.	Educational/Informational	24227 June Wire_FA.pdf	
b.	6/8/2010	$ 2,219.65	SHS	Welcome Ad	"Thanks for letting us in, neighbor." Ad placed in Fort Riley publication for new residents. Provides initial contact information for new customers.	Informational	23764 Welcome_FortRileyBW.pdf	
c.	6/8/2010	$ 500.00	SHS	Leoti Rodeo Sponsorship	"We'll harness the wind" Sponsoship ad placed for an event in community neighboring a Westar Energy wind farm.	Community relations	24177 Leoti Rodeo ad.pdf	
d.	12/15/2010	$ 500.00	Pottawatomie County Economic Development Council	Economic Development Guide	Westar sponsors a number of local events and publications. Jeffrey Energy Center is located in Pottawatomie County. We have a vested interest in this community.	Community relations	N/A	
e.	4/14/2011	$ 133.50	Kansas Press	E-Z Clipz Delivery Service	Westar monitors local media to identify customer perceptions and concerns to allow us to address and clarify issues and educate customers as needeed. Many communities we serve still have small weekly papers that are not online, so a physical clipping service is needed to monitor these publications.	News clips	N/A	
f.	5/14/2010	$ 2,500.00	American Heart Association	Go Red For Women	Westar sponsors a variety of community events and organizations. We have employees actively involved in this event. We also recognize the value of encouraging healthy habits among our employees.	Community relations	Event sponsorship	
g.	8/20/2010	$ 1,000.00	Dress for Success	Women of Distinction Sponsorship	Westar sponsors a variety of community organizations for many reasons. In this instance we see the importance of supporting the professional development of women. We have active employees in leadership roles in this organization.	Community relations	N/A	2/
h.	9/1/2010	$ 1,500.00	American Heart Association		Westar sponsors a variety of community events and organizations. We have employees actively involved in this event. We also recognize the value of encouraging healthy habits among our employees.	Community relations	Table at Go Red for Women event	2/
i.	10/15/2010	$ 1,500.00	American Heart Association			Duplicate		1/ 2/
j.	11/30/2010	$ 2,682.50	Don Levy	Dress for Success	As part of our sponsorship of Executive Women's International, we paid for printing of the Dress for Success program book.	Community relations	File provided: EWI Book to take home 2.pdf	2/
k.	12/8/2010	$ 2,500.00	Botanica	Illuminations	Westar Energy sponsored Wichita's Botanica Gardens holiday Illuminations event.	Community relations	N/A	2/
l.	12/21/2010	$ 3,500.00	VisitTopeka	Holiday Light Tour	Westar Energy sponsored Visit Topeka's holiday light tour. This tour aimed to attract Kansans to Topeka.	Community relations	File provided: Christmas Light Tour Visit Topeka.wmv	2/
m.	3/21/2011	$ 3,450.64	BerryNetwork	Feb charges/late fees	Berry Network provides phone listing for yellow pages, white pages and Internet. Due to staff changes their invoice was sent to the wrong person and was paid late, incurring late fees.	Customer service/Informational	Attached copy of invoice to show publications reflected on this invoice. See also attachment to DR 175.	
n.	3/11/2011	$ 1,246.57	SHS	Westar production materials	Throughout a month SHS provides various copying, faxing, delivery services related to projects they are working on. Rather than create separate invoices for these general activities, the agency compiles them into a monthly production materials invoice.	Account services	N/A	
o.	3/11/2011	$ 1,315.00	SHS	Your Relentless Drive	To show support for our communities and their chambers of commerce, we place ads in chamber publications in many cities we serve.	Community relations	Artwork matches 23756 Chamber_Emporia BW FA.pdf and 23756 Chamber_Wichita BW FA.pdf	

Footnotes:

1/ Duplicate payment was removed from total advertising costs included in the rate case filing. Refer to IS-15 working papers.

2/ These items were reclassified to donations -- FERC Acct. 4261000. Refer to IS-15 working papers.

energytools, llc. DATA REQUEST EASY ACCESS MANAGEMENT SYSTEM

Home Page Change Password

Monday, January 02, 2012
Logged in as: **[Andrea Crane]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Justin Grady]
Data Request: KCC-179 :: ECRR - Accumulated Depreciation
Date: 0000-00-00

Question 1 (Prepared by Dick Rohlfs)
In Pro Forma adjustment No. 33, Westar attempts to remove all cost of service elements related to Westar's ECRR revenue requirement granted in Docket No. 09-WSEE-737-TAR-CPL-1. Please provide the following with regard to this adjustment. 1. Please provide all supporting calculations for how Westar derived the accumulated depreciation amount of $34,462,732 to remove from the cost of service in this case

Response:
Westar inadvertently picked up an incorrect number related to the accumulated depreciation to the environmental projects included in its ECRR. The correct accumulated depreciation should be $22,070,752. This amount is found on Attachment B of Staff's report and recommendation in the 09-737 docket attached.

Attachment File Name	Attachment Note
KCC 179 thru 182.pdf	

DATA REQUEST EASY ACCESS MANAGEMENT SYSTEM
energytools, llc.

Thursday, October 27, 2011
Logged in as: **[Marjorie Levin]** Logout

Home Page Change Password

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Andria Finger]
Data Request: KCC-207 :: Deferred Pension Expense, Adjustment IS-10
Date: 0000-00-00

Question 1 (Prepared by Jim Armstrong)
1. Please provide Westar's capitalization percentages for 2009, 2010 and 2011. 2. If Wolf Creek Nuclear Operating Company's capitalization percentage differs from Westar's capitalization percentage, please provide WCNOC's capitalization percentages for 2009, 2010, and 2011.

Response:
1. The following are Westar capitalization rates for 2009, 2010, and 2011: 2009 24.8% 2010 26.6% 2011 26.6% 2. The following are the WCNOC capitalization rates for 2009, 2010, and 2011: 2009 10.3% 2010 10.2% 2011 10.1 %

No Digital Attachments Found.

DATA REQUEST EASY ACCESS MANAGEMENT SYSTEM
energytools, llc.

Home Page Change Password

Monday, January 02, 2012
Logged in as: **[Andrea Crane]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Kristina Luke]
Data Request: KCC-292 :: CWIP
Date: 0000-00-00

Question 1 (Prepared by Jeanette Bouzianis)
For each work order included in CWIP (over $10,000), please provide the percentage complete and the dollar amount completed by March 31, 2011 and September 30, 2011.

Response:
See columns h through m of the attached file for percentage complete and the dollar amount completed by March 31, 2011 and September 30, 2011.

Attachment File Name	Attachment Note
KCC Data Request 292 CWIP.xlsx	

Home Page Change Password

Monday, November 14, 2011
Logged in as: **[Marjorie Levin]** Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Kristina Luke]
Data Request: KCC-300 :: Dues
Date: 0000-00-00

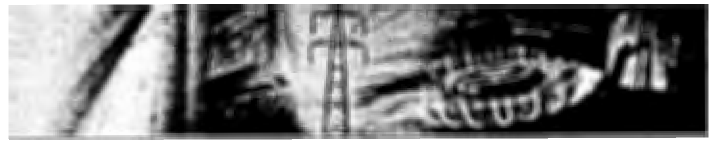
Question 1 (Prepared by Kevin Kongs)
Referring to Westar's response to Staff DR 54 and 170, please provide more detail about the journal entries to the following vendors. This detail should include, but not be limited to, the organization's name, why Westar feels it is reasonable to support these organizations, and why Westar believes it is reasonable to include these costs in rates. 9302001: All Chapter Meeting Meals by IECINC, along with: a. 5/7/10 Visioneering Funding $4,000 WICHITAMET b. 5/7/10 Young Professionals Corporate $1,500 WICHITAMET c. 1/21/11 Platinum Sponsor IABC Professi $500 IABCTOPEKA d. 2/4/11 C of C Flash Passes Dues $220 GENNETTABU e. 3/7/11 Annual meeting/8 Guests $160 UNITEDWAYO 9210007: 7/12/10 100427 WSJ Subscription $155 KBCCARDSER 10/18/10 100908 United Way Raffle Drawing $100 KBCCARDSER 8/16/10 2010 Civic Donation, Bronze $500 KANSASCOSM 2/18/11 Dues 2011-12 $645 SOCIETYOFC 4/22/10 Festival Buttons (50) Salina $500 SMOKYHILLR 9/1/10 KBC Card Services/US Bank $872.18 NOT LISTED

Response:
See the attached file for a description of the organizations and Westar's reasons for supporting them. Including 50 percent of Westar's donations to these organizations is reasonable because it is consistent with the public policy of the state of Kansas as set forth in K.S.A. 66-101f and K.S.A. 66-1,136 that allow the Commission to adopt a policy of disallowing a percentage, not to exceed 50%, of utility dues, donations and contributions to charitable, civic and social organizations and entities.

Attachment File Name	Attachment Note
KCC-300 Dues.xlsx	

Westar Energy, Inc.
KCC Date Request No. 300: Dues

Item No.	Date of Transaction	Amount	Description for Data Request	Organization Name	Westar's reason to support the organization and why these costs should be included in rates
9302001					
a.	5/7/2010	4,000.00	Visioneering Funding	Wichita Metro Chamber of Commerce	By partnering with our communities, Westar will be a model of civic leadership and environmental stewardship. In addition, Westar's interaction with our service communities allows us to communicate and educate our customers and work to find solutions for any problems encountered.
b.	5/7/2010	1,500.00	Young Professionals Corporate Investment	Wichita Metro Chamber of Commerce	By partnering with our communities, Westar will be a model of civic leadership and environmental stewardship. In addition, Westar's interaction with our service communities allows us to communicate and educate our customers and work to find solutions for any problems encountered.
c.	1/21/2011	500.00	Corporate Sponsorship IABC Professionals	International Association of Business Communicators	International Association of Business Communicators provides Westar access to a professional network of business communication professionals. This organization provides educational materials including articles, access to libraries and content on a variety of real life experiences from experienced professionals involved in many different areas of business.
d.	2/4/2011	220.00	2011 Event Flash Passes	Hutchinson/Reno County Chamber of Commerce	By partnering with our communities, Westar will be a model of civic leadership and environmental stewardship. In addition, Westar's interaction with our service communities allows us to communicate and educate our customers and work to find solutions for any problems encountered.
e.	3/7/2011	160.00	Event Fee for United Way Meeting	Salina Area United Way	By partnering with our communities, Westar will be a model of civic leadership and environmental stewardship. In addition, Westar's interaction with our service communities allows us to communicate and educate our customers and work to find solutions for any problems encountered.
f.			Meals for Chapter Meetings	Independent Electrical Contractors, Inc.	Independent Electrical Contractors, Inc. provides Westar access to a organization of electrical contractors dedicated to providing technical education, training and business management skills to its members. The organization represents independent electrical contractors, journeymen electricians, apprentices and suppliers and distributors.
9210007					
a.	7/12/2010	155.00	Subscription to Wall Street Journal	Wall Street Journal	Subscription provides access to financial information used in several areas of the company. Information such as current and forecasted interest rates, status of credit markets and current financial news are particularly important to departments responsible for financial transactions.
b.	10/18/2010	100.00	Gift Card for United Way Campaign	Hutchinson Area United Way	Gift card was purchased to support United Way campaign in Hutchinson. Westar was incorrectly charged $100 on the original transaction but subsequently received a $50 credit which was also recorded in this account. By partnering with our communities, Westar will be a model of civic leadership and environmental stewardship. In addition, Westar's interaction with our service communities allows us to communicate and educate our customers and work to find solutions for any problems encountered.
c.	8/16/2010	500.00	Corporate Sponsorship	Kansas Cosmosphere and Space Center	By partnering with our communities, Westar will be a model of civic leadership and environmental stewardship. In addition, Westar's interaction with our service communities allows us to communicate and educate our customers and work to find solutions for any problems encountered.
d.	2/18/2011	645.00	Annual Dues	Society of Corporate Secretaries & Governance Professionals	Organization provides access to professionals from various industries responsible for supporting their board of directors and executive management in governance matters including working with the SEC, stock exchanges and state corporate compliance. This organization also provides professional development and educational materials to its members related to corporate governance.
e.	4/22/2010	500.00	Festival Admission Fees for Civic Event	Salina Arts and Humanities Commission	By partnering with our communities, Westar will be a model of civic leadership and environmental stewardship. In addition, Westar's interaction with our service communities allows us to communicate and educate our customers and work to find solutions for any problems encountered.
f.	9/1/2010	872.18	National Electric Safety Code and National Electric Safety Code Interpretations Manuals	Institute of Electrical & Electronics Engineers, Inc.	Expenditure for two orders of electrical standards manuals. One order was returned in October 2009 for which the company received a refund of $436.09.



Home Page Change Password

Monday, November 14, 2011
Logged in as: [**Marjorie Levin**] Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Andrew Fry]
Data Request: KCC-305 :: 12-WSEE-112-RTS
Date: 0000-00-00

Question 1 (Prepared by Mike Heim)
Referring to Section 6, Schedule 6-E, please provide a monthly, ending fossil fuel balances by individual fuel types from January 1, 2008 through September 30, 2011.

Response:
Please the attached files for monthly fossil fuel inventory balances by plant by fuel type from January 1, 2008 through September 30, 2011.

Attachment File Name	Attachment Note
KCC 305 - 2008 Fuel Stock Balances by Plant & Type.xls	
KCC 305 - 2009 Fuel Stock Balances by Plant & Type.xls	
KCC 305 - 2010 Fuel Stock Balances by Plant & Type.xls	
KCC 305 - 2011 Fuel Stock Balances by Plant & Type.xls	

C:\Users\Owner\Documents\[KCC_305_-_2010_Fuel_Stock_Balances_by_Plant_&_Type.xls]Dec 10

March 2010 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3
After Accruals

13-Dec-11

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				108,269.85	$3,132,050.00	$28.9282	33,332.00	$22,730.42	$0.6819	$3,154,780.42						
Lawrence-PRB				379,665.39	$10,989,511.49	$28.9453				$10,989,511.49						
Jeffrey + MKEC				1,144,860.80	30,234,247.24	$26.4087	533,348.00	$1,151,819.55	$2.1596	$31,386,066.79	18,960.25	$618,543.19	$32.6232			
Hutchinson Steam	2,080,749.00	$1,806,651.43	$0.8683				274,596.00	$324,675.85	$1.1824	$2,131,327.28						
Abilene																
Gordon Evans CT's							475,817.00	$495,753.64	$1.0419	$495,753.64						
Adjustments																
Total KPL	2,080,749.00	$1,806,651.43	$0.8683	1,632,796.04	$44,355,808.73	$27.1656	1,317,093.00	$1,994,979.46	$1.5147	$48,157,439.62	18,960.25	$618,543.19	$32.6232			
Lacygne #1				31,501.82	$1,350,601.35	$42.8738	304,821.00	$640,800.63	$2.1022	$1,991,401.98	10,136.20	$92,882.61	$9.1635	68.71	$29,351.65	$427.1816
Lacygne #2				501,282.27	$10,340,490.14	$20.6281	0.00	$0.00		$10,340,490.14						
Jeffrey (KGE)				315,132.33	$8,324,091.56	$26.4146	148,152.00	$319,949.88	$2.1596	$8,644,041.44	5,266.74	$171,817.55	$32.6231			
Murray Gill	2,008,593.00	$1,579,420.02	$0.7863							$1,579,420.02						
Gordon Evans	4,434,138.00	$4,324,413.61	$0.9753							$4,324,413.61						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							151,113.39	$296,468.77	$1.9619	$296,468.77						
Adjustments LAEC												$0.00			$0.00	
Total KGE	7,214,523.00	$6,330,876.84	$0.8775	847,916.41	$20,015,183.05	$23.6051	604,086.39	$1,257,219.28	$2.0812	$27,603,279.17	15,402.94	$264,700.16	$17.1850	68.71	$29,351.65	$427.1816
Total WE	9,295,272.00	$8,137,528.27	$0.8754	2,480,712.45	$64,370,991.78	$25.9486	1,921,179.39	$3,252,198.74	$1.6928	$75,760,718.79	34,363.19	$883,243.35	$25.7032	68.71	$29,351.65	$427.1816
G/L Balance		8,137,528.27			64,370,991.48			3,252,198.74				883,243.35			29,351.65	
Diff		0.00			0.30			0.00				0.00			0.00	

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	403	$3,010.08	7.4692
Hutch & Abilene DF0033	23,364	$118,776.08	5.0837
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	36,910	$167,103.69	4.5273
Gill & Evans-KGS DF0034	0	$0.00	#DIV/0!
Spring Creek - DF0035	(115)	($442.75)	3.8500
Emporia - DF0036	71,084	$507,535.61	7.1399
Total Gas	131,646	$795,982.71	6.0464
G/L Balance		$795,982.69	
		-$0.02	

Nuclear Fuel a/c 1200000 $72,798,788.33

C:\Users\Owner\Documents\[KCC_305_-_2010_Fuel_Stock_Balances_by_Plant_&_Type.xls]Dec 10

April 2010 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3
After Accruals

13-Dec-11

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				121,041.85	$3,536,294.43	$29.2155	33,332.00	$22,730.42	$0.6819	$3,559,024.85						
Lawrence-PRB				369,047.35	$10,785,979.64	$29.2265				$10,785,979.64						
Jeffrey + MKEC				1,235,212.06	32,784,569.02	$26.5417	500,614.00	$1,081,128.59	$2.1596	$33,865,697.61	20,135.16	$646,901.05	$32.1279			
Hutchinson Steam	2,080,749.00	$1,806,651.43	$0.8683				274,596.00	$324,675.85	$1.1824	$2,131,327.28						
Abilene																
Gordon Evans CT's							475,713.00	$495,645.28	$1.0419	$495,645.28						
Adjustments																
Total KPL	2,080,749.00	$1,806,651.43	$0.8683	1,725,301.26	$47,106,843.09	$27.3035	1,284,255.00	$1,924,180.14	$1.4983	$50,837,674.66	20,135.16	$646,901.05	$32.1279			
Lacygne #1				30,516.24	$1,318,705.68	$43.2132	291,243.00	$622,524.08	$2.1375	$1,941,229.76	8,571.70	$79,290.35	$9.2502	114.57	$45,680.06	$398.7087
Lacygne #2				514,995.91	$10,933,611.38	$21.2305	0.00	$0.00		$10,933,611.38						
Jeffrey (KGE)				340,567.14	$9,040,635.33	$26.5458	139,060.00	$300,313.50	$2.1596	$9,340,948.83	5,593.10	$179,694.73	$32.1279			
Murray Gill	2,008,593.00	$1,579,420.02	$0.7863							$1,579,420.02						
Gordon Evans	4,434,138.00	$4,324,413.61	$0.9753							$4,324,413.61						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							154,631.81	$305,409.23	$1.9751	$305,409.23						
Adjustments LAEC												$0.00			$0.00	
Total KGE	7,214,523.00	$6,330,876.84	$0.8775	886,079.29	$21,292,952.39	$24.0305	584,934.81	$1,228,246.81	$2.0998	$28,852,076.04	14,164.80	$258,985.08	$18.2837	114.57	$45,680.06	$398.7087
Total WE	9,295,272.00	$8,137,528.27	$0.8754	2,611,380.55	$68,399,795.48	$26.1930	1,869,189.81	$3,152,426.95	$1.6865	$79,689,750.70	34,299.96	$905,886.13	$26.4107	114.57	$45,680.06	$398.7087
G/L Balance		8,137,528.27			68,399,795.18			3,152,426.95				905,886.13			45,680.06	
Diff		0.00			0.30			0.00				0.00			0.00	

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	(5,836)	($21,593.20)	3.7000
Hutch & Abilene DF0033	20,056	$92,240.93	4.5992
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	15,571	$64,074.44	4.1150
Gill & Evans-KGS DF0034	0	$0.00	#DIV/0!
Spring Creek - DF0035	324	$2,102.35	6.4887
Emporia - DF0036	42,996	$281,686.53	6.5515
Total Gas	73,111	$418,511.05	5.7243
G/L Balance		$418,511.02	
		-$0.03	

Nuclear Fuel a/c 1200000 $70,638,943.28

C:\Users\Owner\Documents\[KCC_305_-_2010_Fuel_Stock_Balances_by_Plant_&_Type.xls]Dec 10

May 2010 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3
After Accruals

13-Dec-11

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				120,337.63	$3,576,654.78	$29.7218	33,332.00	$22,730.42	$0.6819	$3,599,385.20						
Lawrence-PRB				380,402.52	$11,294,595.10	$29.6912				$11,294,595.10						
Jeffrey + MKEC				1,314,724.70	35,001,378.32	$26.6226	482,197.00	$1,041,352.39	$2.1596	$36,042,730.71	20,137.60	$646,808.78	$32.1195			
Hutchinson Steam	2,080,749.00	$1,806,651.43	$0.8683				274,458.00	$324,512.68	$1.1824	$2,131,164.11						
Abilene																
Gordon Evans CT's							475,623.00	$495,551.51	$1.0419	$495,551.51						
Adjustments																
Total KPL	2,080,749.00	$1,806,651.43	$0.8683	1,815,464.85	$49,872,628.20	$27.4710	1,265,610.00	$1,884,147.00	$1.4887	$53,563,426.63	20,137.60	$646,808.78	$32.1195			
Lacygne #1				30,635.49	$1,332,698.93	$43.5018	0.00	$0.00	#DIV/0!	$1,332,698.93	8,498.20	$79,293.96	$9.3307	50.17	$19,848.75	$395.6141
Lacygne #2				518,310.84	$10,973,437.50	$21.1715	296,731.00	$643,877.72		$11,617,315.22						
Jeffrey (KGE)				362,981.39	$9,664,485.77	$26.6253	133,943.00	$289,264.55	$2.1596	$9,953,750.32	5,593.78	$179,669.11	$32.1194			
Murray Gill	2,008,593.00	$1,579,420.02	$0.7863							$1,579,420.02						
Gordon Evans	4,434,138.00	$4,324,413.61	$0.9753							$4,324,413.61						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							153,530.13	$303,632.11	$1.9777	$303,632.11						
Adjustments LAEC												$0.00			$0.00	
Total KGE	7,214,523.00	$6,330,876.84	$0.8775	911,927.72	$21,970,622.20	$24.0925	584,204.13	$1,236,774.38	$2.1170	$29,538,273.42	14,091.98	$258,963.07	$18.3766	50.17	$19,848.75	$395.6141
Total WE	9,295,272.00	$8,137,528.27	$0.8754	2,727,392.57	$71,843,250.40	$26.3414	1,849,814.13	$3,120,921.38	$1.6872	$83,101,700.05	34,229.58	$905,771.85	$26.4617	50.17	$19,848.75	$395.6141
G/L Balance		8,137,528.27			71,843,250.10			3,120,921.37				905,771.85			19,848.75	
Diff		0.00			0.30			0.01				0.00			0.00	

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	(301)	($1,249.15)	4.1500
Hutch & Abilene DF0033	23,181	$109,062.99	4.7048
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	(90,659)	($376,234.85)	4.1500
Gill & Evans-KGS DF0034	0	$0.00	#DIV/0!
Spring Creek - DF0035	1,305	$5,705.00	4.3716
Emporia - DF0036	8,767	$63,404.20	7.2321
Total Gas	(57,707)	($199,311.81)	3.4539
G/L Balance		-$199,311.82	
		-$0.01	

Nuclear Fuel a/c 1200000 $68,393,640.46

C:\Users\Owner\Documents\[KCC_305_-_2010_Fuel_Stock_Balances_by_Plant_&_Type.xls]Dec 10

June 2010 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3
After Accruals

13-Dec-11

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				90,876.18	$2,745,798.51	$30.2147	33,332.00	$22,730.42	$0.6819	$2,768,528.93						
Lawrence-PRB				349,943.08	$10,539,166.02	$30.1168				$10,539,166.02						
Jeffrey + MKEC				1,312,270.16	34,932,922.71	$26.6202	393,177.00	$848,756.32	$2.1587	$35,781,679.03	22,359.16	$712,673.54	$31.8739			
Hutchinson Steam	2,080,749.00	$1,806,651.43	$0.8683				319,146.00	$377,351.77	$1.1824	$2,184,003.20						
Abilene																
Gordon Evans CT's							475,316.00	$495,231.65	$1.0419	$495,231.65						
Adjustments																
Total KPL	2,080,749.00	$1,806,651.43	$0.8683	1,753,089.42	$48,217,887.24	$27.5045	1,220,971.00	$1,744,070.16	$1.4284	$51,768,608.83	22,359.16	$712,673.54	$31.8739			
Lacygne #1				44,400.78	$1,419,974.42	$31.9808	0.00	$0.00	#DIV/0!	$1,419,974.42	8,442.70	$79,175.26	$9.3780	53.76	$21,167.24	$393.7359
Lacygne #2				497,993.35	$9,692,145.01	$19.4624	316,198.00	$691,543.08		$10,383,688.09						
Jeffrey (KGE)				362,308.39	$9,645,324.76	$26.6219	109,217.00	$235,765.65	$2.1587	$9,881,090.41	6,210.99	$197,964.87	$31.8733			
Murray Gill	2,008,593.00	$1,579,420.02	$0.7863							$1,579,420.02						
Gordon Evans	4,434,138.00	$4,324,413.61	$0.9753							$4,324,413.61						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							157,040.56	$311,392.92	$1.9829	$311,392.92						
Adjustments LAEC												$0.00			$0.00	
Total KGE	7,214,523.00	$6,330,876.84	$0.8775	904,702.52	$20,757,444.19	$22.9439	582,455.56	$1,238,701.65	$2.1267	$28,327,022.68	14,653.69	$277,140.13	$18.9127	53.76	$21,167.24	$393.7359
Total WE	9,295,272.00	$8,137,528.27	$0.8754	2,657,791.94	$68,975,331.43	$25.9521	1,803,426.56	$2,982,771.81	$1.6539	$80,095,631.51	37,012.85	$989,813.67	$26.7424	53.76	$21,167.24	$393.7359
G/L Balance		8,137,528.27			68,975,331.13			2,982,771.81				989,813.67			21,167.24	
Diff		0.00			0.30			0.00				0.00			0.00	

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	(446)	($2,029.30)	4.5500
Hutch & Abilene DF0033	885	$4,717.47	5.3305
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	58,990	$276,731.22	4.6912
Gill & Evans-KGS DF0034	0	$0.00	#DIV/0!
Spring Creek - DF0035	(9,773)	($44,467.96)	4.5501
Emporia - DF0036	52,667	$291,146.45	5.5281
Total Gas	102,323	$526,097.88	5.1415
G/L Balance		$526,097.88	
		$0.00	

Nuclear Fuel a/c 1200000 $68,491,834.73

C:\Users\Owner\Documents\[KCC_305_-_2010_Fuel_Stock_Balances_by_Plant_&_Type.xls]Dec 10

July 2010 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3
After Accruals

13-Dec-11

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				99,614.48	$2,991,431.72	$30.0301	33,332.00	$22,730.42	$0.6819	$3,014,162.14						
Lawrence-PRB				354,592.62	$10,642,776.09	$30.0141				$10,642,776.09						
Jeffrey + MKEC				1,193,172.89	31,986,734.01	$26.8081	348,831.00	$753,336.05	$2.1596	$32,740,070.06	20,726.03	$656,775.69	$31.6884			
Hutchinson Steam	2,080,749.00	$1,806,651.43	$0.8683				300,582.00	$355,401.70	$1.1824	$2,162,053.13						
Abilene																
Gordon Evans CT's							475,021.00	$494,924.29	$1.0419	$494,924.29						
Adjustments																
Total KPL	2,080,749.00	$1,806,651.43	$0.8683	1,647,379.99	$45,620,941.82	$27.6930	1,157,766.00	$1,626,392.46	$1.4048	$49,053,985.71	20,726.03	$656,775.69	$31.6884			
Lacygne #1				40,204.31	$1,381,817.41	$34.3699	342,938.00	$748,865.48	$2.1837	$2,130,682.89	8,271.20	$77,794.17	$9.4054	93.18	$39,417.63	$423.0403
Lacygne #2				460,154.47	$9,272,915.67	$20.1517	0.00	$0.00		$9,272,915.67						
Jeffrey (KGE)				329,229.49	$8,826,630.63	$26.8100	96,897.00	$209,260.01	$2.1596	$9,035,890.64	5,757.23	$182,437.69	$31.6884			
Murray Gill	2,008,593.00	$1,579,420.02	$0.7863							$1,579,420.02						
Gordon Evans	4,434,138.00	$4,324,413.61	$0.9753							$4,324,413.61						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							156,069.54	$309,508.09	$1.9831	$309,508.09						
Adjustments LAEC												$0.00			$0.00	
Total KGE	7,214,523.00	$6,330,876.84	$0.8775	829,588.27	$19,481,363.71	$23.4832	595,904.54	$1,267,633.58	$2.1272	$27,079,874.13	14,028.43	$260,231.86	$18.5503	93.18	$39,417.63	$423.0403
Total WE	9,295,272.00	$8,137,528.27	$0.8754	2,476,968.27	$65,102,305.53	$26.2831	1,753,670.54	$2,894,026.04	$1.6503	$76,133,859.84	34,754.46	$917,007.55	$26.3853	93.18	$39,417.63	$423.0403
G/L Balance		8,137,528.27			65,102,305.23			2,886,026.04				917,007.55			39,417.63	
Diff		0.00			0.30			8,000.00				0.00			0.00	

Due to an error on the JEC accrual entry for #2 oil, the GL balance is overstated by $8,000.

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	281	$2,764.13	9.8368
Hutch & Abilene DF0033	14,148	$72,416.28	5.1185
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	(4,259)	($18,526.65)	4.3500
Gill & Evans-KGS DF0034	0	$0.00	#DIV/0!
Spring Creek - DF0035	9,269	$44,536.95	4.8049
Emporia - DF0036	(22,929)	($99,741.15)	4.3500
Total Gas	(3,490)	$1,449.56	-0.4153
G/L Balance		$1,449.56	
		$0.00	

Nuclear Fuel a/c 1200000 $82,882,025.96

C:\Users\Owner\Documents\[KCC_305_-_2010_Fuel_Stock_Balances_by_Plant_&_Type.xls]Dec 10

August 2010 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3
After Accruals

13-Dec-11

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				114,404.78	$3,459,024.86	$30.2350	33,332.00	$22,730.42	$0.6819	$3,481,755.28						
Lawrence-PRB				357,559.65	$10,785,930.01	$30.1654				$10,785,930.01						
Jeffrey + MKEC				1,082,174.00	28,493,983.23	$26.3303	621,245.00	$1,383,539.27	$2.2270	$29,877,522.50	20,547.99	$647,777.22	$31.5251			
Hutchinson Steam	2,080,749.00	$1,806,651.43	$0.8683				300,391.00	$355,175.86	$1.1824	$2,161,827.29						
Abilene																
Gordon Evans CT's							474,743.00	$494,634.64	$1.0419	$494,634.64						
Adjustments																
Total KPL	2,080,749.00	$1,806,651.43	$0.8683	1,554,138.43	$42,738,936.10	$27.5001	1,429,711.00	$2,256,080.19	$1.5780	$46,801,669.72	20,547.99	$647,777.22	$31.5251			
Lacygne #1				38,468.53	$1,405,314.77	$36.5315	248,963.00	$543,654.74	$2.1837	$1,948,969.51	9,261.70	$87,377.29	$9.4343	112.95	$48,142.03	$426.2243
Lacygne #2				399,780.38	$8,176,402.24	$20.4522	0.00	$0.00		$8,176,402.24						
Jeffrey (KGE)				298,401.68	$7,857,154.54	$26.3308	172,568.00	$384,316.46	$2.2270	$8,241,471.00	5,707.77	$179,938.12	$31.5251			
Murray Gill	2,008,593.00	$1,579,420.02	$0.7863							$1,579,420.02						
Gordon Evans	4,434,138.00	$4,324,413.61	$0.9753							$4,324,413.61						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							155,023.79	$307,478.74	$1.9834	$307,478.74						
Adjustments LAEC												$0.00			$0.00	
Total KGE	7,214,523.00	$6,330,876.84	$0.8775	736,650.59	$17,438,871.55	$23.6732	576,554.79	$1,235,449.94	$2.1428	$25,005,198.33	14,969.47	$267,315.41	$17.8574	112.95	$48,142.03	$426.2243
Total WE	9,295,272.00	$8,137,528.27	$0.8754	2,290,789.01	$60,177,809.65	$26.2695	2,006,265.79	$3,491,530.13	$1.7403	$71,806,868.05	35,517.46	$915,092.63	$25.7646	112.95	$48,142.03	$426.2243
G/L Balance		8,137,528.27			60,177,809.35			3,491,530.13				915,092.63			48,142.03	
Diff		0.00			0.30			0.00				0.00			0.00	

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	(994)	($3,479.00)	3.5000
Hutch & Abilene DF0033	(10,960)	($38,360.00)	3.5000
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	(80,010)	($280,035.00)	3.5000
Gill & Evans-KGS DF0034	0	$0.00	#DIV/0!
Spring Creek - DF0035	(434)	($1,519.00)	3.5000
Emporia - DF0036	(58,838)	($205,933.00)	3.5000
Total Gas	(151,236)	($529,326.00)	3.5000
G/L Balance		-$529,326.00	
		$0.00	

Nuclear Fuel a/c 1200000 $80,703,208.83

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September 2010 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3
After Accruals

13-Dec-11

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				115,598.73	$3,493,333.55	$30.2195	33,332.00	$22,730.42	$0.6819	$3,516,063.97						
Lawrence-PRB				400,580.19	$12,078,871.35	$30.1534				$12,078,871.35						
Jeffrey + MKEC				1,099,651.08	29,236,923.97	$26.5875	587,097.00	$1,307,492.91	$2.2270	$30,544,416.88	15,905.30	$638,046.05	$40.1153			
Hutchinson Steam	2,080,749.00	$1,806,651.43	$0.8683				299,744.00	$354,410.85	$1.1824	$2,161,062.28						
Abilene																
Gordon Evans CT's							474,339.00	$494,213.71	$1.0419	$494,213.71						
Adjustments																
Total KPL	2,080,749.00	$1,806,651.43	$0.8683	1,615,830.00	$44,809,128.87	$27.7313	1,394,512.00	$2,178,847.89	$1.5624	$48,794,628.19	15,905.30	$638,046.05	$40.1153			
Lacygne #1				36,098.83	$1,382,795.65	$38.3058	325,540.00	$716,852.21	$2.2020	$2,099,647.86	8,443.70	$79,733.35	$9.4429	91.62	$36,714.48	$400.7256
Lacygne #2				367,104.41	$7,620,152.07	$20.7575	0.00	$0.00		$7,620,152.07						
Jeffrey (KGE)				303,258.83	$8,063,278.30	$26.5888	163,083.00	$363,192.48	$2.2270	$8,426,470.78	4,418.14	$177,235.01	$40.1153			
Murray Gill	2,008,593.00	$1,579,420.02	$0.7863							$1,579,420.02						
Gordon Evans	4,434,138.00	$4,324,413.61	$0.9753							$4,324,413.61						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							155,023.79	$307,478.74	$1.9834	$307,478.74						
Adjustments LAEC												$0.00			$0.00	
Total KGE	7,214,523.00	$6,330,876.84	$0.8775	706,462.07	$17,066,226.02	$24.1573	643,646.79	$1,387,523.43	$2.1557	$24,784,626.29	12,861.84	$256,968.36	$19.9791	91.62	$36,714.48	$400.7256
Total WE	9,295,272.00	$8,137,528.27	$0.8754	2,322,292.07	$61,875,354.89	$26.6441	2,038,158.79	$3,566,371.32	$1.7498	$73,579,254.48	28,767.14	$895,014.41	$31.1124	91.62	$36,714.48	$400.7256
G/L Balance		8,137,528.27			61,875,354.59			3,566,371.32				886,604.91			36,714.48	
Diff		0.00			0.30			0.00				8,409.50			0.00	

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	(4,955)	($17,342.50)	3.5000
Hutch & Abilene DF0033	6,577	$28,018.25	4.2600
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	(27,513)	($96,295.50)	3.5000
Gill & Evans-KGS DF0034	0	$0.01	#DIV/0!
Spring Creek - DF0035	(4,728)	($16,548.00)	3.5000
Emporia - DF0036	46,286	$267,956.67	5.7892
Total Gas	15,667	$165,788.93	10.5820
G/L Balance		$165,788.91	
		-$0.02	

Nuclear Fuel a/c 1200000 $79,052,103.12

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October 2010 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3
After Accruals

13-Dec-11

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				105,152.23	$3,200,228.78	$30.4342	33,332.00	$22,730.42	$0.6819	$3,222,959.20						
Lawrence-PRB				416,881.35	$12,643,587.96	$30.3290				$12,643,587.96						
Jeffrey + MKEC				1,206,199.48	32,360,832.04	$26.8288	546,050.00	$1,216,080.80	$2.2271	$33,576,912.84	15,638.36	$598,563.44	$38.2753			
Hutchinson Steam	2,080,749.00	$1,806,651.43	$0.8683				299,575.00	$354,211.02	$1.1824	$2,160,862.45						
Abilene																
Gordon Evans CT's							474,184.00	$494,052.22	$1.0419	$494,052.22						
Adjustments																
Total KPL	2,080,749.00	$1,806,651.43	$0.8683	1,728,233.06	$48,204,648.78	$27.8924	1,353,141.00	$2,087,074.46	$1.5424	$52,098,374.67	15,638.36	$598,563.44	$38.2753			
Lacygne #1				35,820.31	$1,419,942.94	$39.6407	240,894.00	$535,681.19	$2.2237	$1,955,624.13	9,636.70	$91,110.36	$9.4545	74.12	$29,305.72	$395.3714
Lacygne #2				336,882.11	$7,165,633.00	$21.2704	0.00	$0.00		$7,165,633.00						
Jeffrey (KGE)				332,862.94	$8,930,876.84	$26.8305	151,681.00	$337,800.22	$2.2270	$9,268,677.06	4,343.99	$166,267.62	$38.2753			
Murray Gill	2,008,593.00	$1,579,420.02	$0.7863							$1,579,420.02						
Gordon Evans	4,434,138.00	$4,324,413.61	$0.9753							$4,324,413.61						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							146,982.56	$296,364.61	$2.0163	$296,364.61						
Adjustments LAEC												$0.00			$0.00	
Total KGE	7,214,523.00	$6,330,876.84	$0.8775	705,565.35	$17,516,452.78	$24.8261	539,557.56	$1,169,846.02	$2.1682	$25,017,175.64	13,980.69	$257,377.98	$18.4095	74.12	$29,305.72	$395.3714
Total WE	9,295,272.00	$8,137,528.27	$0.8754	2,433,798.41	$65,721,101.56	$27.0035	1,892,698.56	$3,256,920.48	$1.7208	$77,115,550.31	29,619.05	$855,941.42	$28.8983	74.12	$29,305.72	$395.3714
G/L Balance		8,137,528.27			65,721,101.26			3,256,920.48				855,941.42			29,305.72	
Diff		0.00			0.30			0.00				0.00			0.00	

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	(1,808)	($5,695.20)	3.1500
Hutch & Abilene DF0033	1,646	$6,737.37	4.0932
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	12,575	$42,756.53	3.4001
Gill & Evans-KGS DF0034	0	$0.00	#DIV/0!
Spring Creek - DF0035	(4,693)	($120,929.43)	25.7680
Emporia - DF0036	3,000	$19,176.44	6.3921
Total Gas	10,720	($57,954.29)	-5.4062
G/L Balance		-$57,953.79	
		$0.50	

Nuclear Fuel a/c 1200000 $82,238,119.66

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November 2010 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3
After Accruals

13-Dec-11

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				127,601.96	$3,625,854.11	$28.4153	33,332.00	$22,730.42	$0.6819	$3,648,584.53						
Lawrence-PRB				371,437.26	$11,837,608.01	$31.8697				$11,837,608.01						
Jeffrey + MKEC				1,503,348.98	36,773,363.22	$24.4610	496,265.00	$1,105,209.34	$2.2271	$37,878,572.56	16,179.24	$596,239.58	$36.8521			
Hutchinson Steam	2,080,749.00	$1,806,651.43	$0.8683				299,414.00	$354,020.65	$1.1824	$2,160,672.08						
Abilene																
Gordon Evans CT's							474,019.00	$493,880.31	$1.0419	$493,880.31						
Adjustments																
Total KPL	2,080,749.00	$1,806,651.43	$0.8683	2,002,388.20	$52,236,825.34	$26.0873	1,303,030.00	$1,975,840.72	$1.5163	$56,019,317.49	16,179.24	$596,239.58	$36.8521			
Lacygne #1				40,567.53	$1,645,090.00	$40.5519	273,732.00	$633,863.45	$2.3156	$2,278,953.45	8,531.20	$80,555.56	$9.4425	47.21	$18,078.21	$382.9724
Lacygne #2				261,272.17	$5,615,135.83	$21.4915	0.00	$0.00		$5,615,135.83						
Jeffrey (KGE)				415,406.19	$10,157,476.42	$24.4519	137,851.00	$307,002.59	$2.2271	$10,464,479.01	4,494.23	$165,622.10	$36.8522			
Murray Gill	2,008,593.00	$1,579,420.02	$0.7863							$1,579,420.02						
Gordon Evans	4,434,138.00	$4,324,413.61	$0.9753							$4,324,413.61						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							146,349.94	$294,191.21	$2.0102	$294,191.21						
Adjustments LAEC												$0.00			$0.00	
Total KGE	7,214,523.00	$6,330,876.84	$0.8775	717,245.89	$17,417,702.25	$24.2841	557,932.94	$1,235,057.25	$2.2136	$24,983,636.34	13,025.43	$246,177.66	$18.8998	47.21	$18,078.21	$382.9724
Total WE	9,295,272.00	$8,137,528.27	$0.8754	2,719,634.08	$69,654,527.59	$25.6117	1,860,962.94	$3,210,897.97	$1.7254	$81,002,953.83	29,204.67	$842,417.24	$28.8453	47.21	$18,078.21	$382.9724
G/L Balance		8,137,528.27			69,654,527.29			3,211,897.97				842,417.24			18,078.21	
Diff		0.00			0.30			-1,000.00				0.00			0.00	

Due to error in accrual entry

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	(1,285)	($5,268.50)	4.1000
Hutch & Abilene DF0033	4,574	$21,109.31	4.6151
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	(15,708)	($64,402.80)	4.1000
Gill & Evans-KGS DF0034	0	$0.00	#DIV/0!
Spring Creek - DF0035	(5,153)	($122,759.32)	23.8229
Emporia - DF0038	(7,285)	($29,868.50)	4.1000
Total Gas	(24,857)	($201,189.81)	8.0939
G/L Balance		-$201,189.81	
		$0.00	

Nuclear Fuel a/c 1200000 $80,074,123.99

C:\Users\Owner\Documents\[KCC_305_-_2010_Fuel_Stock_Balances_by_Plant_&_Type.xls]Dec 10

December 2010 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3
After Accruals

13-Dec-11

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				129,564.21	$3,760,311.83	$29.0228	33,332.00	$22,730.42	$0.6819	$3,783,042.25						
Lawrence-PRB				374,336.00	$11,678,785.25	$31.1987				$11,678,785.25						
Jeffrey + MKEC				1,409,668.52	35,683,990.97	$25.3137	405,041.00	$902,044.37	$2.2270	$36,586,035.34	13,405.65	$481,960.90	$35.9521			
Hutchinson Steam	2,080,749.00	$1,806,651.43	$0.8683				299,282.00	$353,864.57	$1.1824	$2,160,516.00						
Abilene																
Gordon Evans CT's							473,743.00	$493,592.75	$1.0419	$493,592.75						
Adjustments																
Total KPL	2,080,749.00	$1,806,651.43	$0.8683	1,913,568.73	$51,123,088.05	$26.7161	1,211,398.00	$1,772,232.11	$1.4630	$54,701,971.59	13,405.65	$481,960.90	$35.9521			
Lacygne #1				52,574.49	$1,966,244.32	$37.3992	295,809.00	$636,509.59	$2.1518	$2,602,753.91	8,531.20	$80,439.56	$9.4289	47.21	$18,078.21	$382.9724
Lacygne #2				275,885.85	$5,659,419.52	$20.5136	0.00	$0.00		$5,659,419.52						
Jeffrey (KGE)				389,383.70	$9,855,023.72	$25.3093	112,511.00	$250,567.88	$2.2271	$10,105,591.60	3,723.79	$133,878.03	$35.9521			
Murray Gill	2,008,593.00	$1,579,420.02	$0.7863							$1,579,420.02						
Gordon Evans	4,434,138.00	$4,324,413.61	$0.9753							$4,324,413.61						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							160,881.87	$331,796.52	$2.0624	$331,796.52						
Adjustments LAEC												$0.00			$0.00	
Total KGE	7,214,523.00	$6,330,876.84	$0.8775	717,844.04	$17,480,687.56	$24.3517	569,201.87	$1,218,873.99	$2.1414	$25,030,438.39	12,254.99	$214,317.59	$17.4882	47.21	$18,078.21	$382.9724
Total WE	9,295,272.00	$8,137,528.27	$0.8754	2,631,412.77	$68,603,775.61	$26.0711	1,780,599.87	$2,991,106.10	$1.6798	$79,732,409.98	25,660.64	$696,278.49	$27.1341	47.21	$18,078.21	$382.9724
G/L Balance		8,137,528.27			68,603,775.31			2,991,106.10				696,278.49			18,078.21	
Diff		0.00			0.30			0.00				0.00			0.00	

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	184	$1,207.02	6.5599
Hutch & Abilene DF0033	(729)	($3,389.85)	4.6500
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	6,739	$29,520.43	4.3805
Gill & Evans-KGS DF0034	0	$0.00	#DIV/0!
Spring Creek - DF0035	0	$0.00	#DIV/0!
Emporia - DF0036	(4,169)	($19,385.85)	4.6500
Total Gas	2,025	$7,951.75	3.9268
G/L Balance		$7,951.76	
		$0.01	

Nuclear Fuel a/c 1200000 $78,102,297.90

January 2011 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3
After Accruals

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				116,985.19	$3,462,125.59	$29.5946	33,332.00	$22,730.42	$0.6819	$3,484,856.01						
Lawrence-PRB				344,308.48	$10,713,515.58	$31.1160				$10,713,515.58						
Jeffrey + MKEC				1,325,555.17	34,339,788.58	$25.9060	383,002.00	$852,963.07	$2.2270	$35,192,751.65	13,505.19	$451,702.34	$33.4466			
Hutchinson Steam	2,080,749.00	$1,806,651.43	$0.8683				299,282.00	$353,864.57	$1.1824	$2,160,516.00						
Abilene																
Gordon Evans CT's							466,970.00	$486,535.96	$1.0419	$486,535.96						
Adjustments																
Total KPL	2,080,749.00	$1,806,651.43	$0.8683	1,786,848.84	$48,515,429.75	$27.1514	1,182,586.00	$1,716,094.02	$1.4511	$52,038,175.20	13,505.19	$451,702.34	$33.4466			
Lacygne #1				59,976.00	$2,331,137.79	$38.8678	269,391.00	$598,327.10	$2.2210	$2,929,464.89	8,531.20	$80,323.46	$9.4153	47.21	$18,078.21	$382.9724
Lacygne #2				304,425.09	$7,552,734.38	$24.8098	0.00	$0.00		$7,552,734.38						
Jeffrey (KGE)				366,228.74	$9,487,248.98	$25.9053	106,389.00	$236,934.19	$2.2271	$9,724,183.17	3,751.44	$125,472.87	$33.4466			
Murray Gill	2,008,593.00	$1,579,420.02	$0.7863							$1,579,420.02						
Gordon Evans	4,434,138.00	$4,324,413.61	$0.9753							$4,324,413.61						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							159,201.15	$328,499.81	$2.0634	$328,499.81						
Adjustments LAEC												$0.00			$0.00	
Total KGE	7,214,523.00	$6,330,876.84	$0.8775	730,629.83	$19,371,121.15	$26.5129	534,981.15	$1,163,761.10	$2.1753	$26,865,759.09	12,282.64	$205,796.33	$16.7551	47.21	$18,078.21	$382.9724
Total WE	9,295,272.00	$8,137,528.27	$0.8754	2,517,478.67	$67,886,550.90	$26.9661	1,717,567.15	$2,879,855.12	$1.6767	$78,903,934.29	25,787.83	$657,498.67	$25.4965	47.21	$18,078.21	$382.9724
G/L Balance		8,137,528.27			67,856,550.60			2,879,855.12				657,498.67			18,078.21	
Diff		0.00			30,000.30			0.00				0.00			0.00	

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	(1,172)	($5,274.00)	4.5000
Hutch & Abilene DF0033	(10,474)	($47,133.00)	4.5000
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	1,939	$8,840.57	4.5593
Gill & Evans-KGS DF0034	0	$0.00	#DIV/0!
Spring Creek - DF0035	0	$31,994.81	#DIV/0!
Emporia - DF0036	16,645	$191,214.15	11.4878
Total Gas	6,938	$179,642.53	25.8926
G/L Balance		$179,642.53	
		$0.00	

Nuclear Fuel a/c 1200000 $76,184,453.00

February 2011 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3

After Accruals

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				113,226.84	$3,404,939.24	$30.0718	33,332.00	$22,730.42	$0.6819	$3,427,669.66						
Lawrence-PRB				330,240.66	$10,260,243.04	$31.0690				$10,260,243.04						
Jeffrey + MKEC				1,335,712.89	35,215,081.01	$26.3643	571,521.00	$1,391,871.28	$2.4354	$36,606,952.29	13,654.98	$451,385.77	$33.0565			
Hutchinson Steam	2,080,749.00	$1,806,651.43	$0.8683				299,162.00	$353,722.68	$1.1824	$2,160,374.11						
Abilene																
Gordon Evans CT's							466,584.00	$486,133.79	$1.0419	$486,133.79						
Adjustments																
Total KPL	2,080,749.00	$1,806,651.43	$0.8683	1,779,180.39	$48,880,263.29	$27.4735	1,370,599.00	$2,254,458.17	$1.6449	$52,941,372.89	13,654.98	$451,385.77	$33.0565			
Lacygne #1				65,157.15	$2,588,640.70	$39.7292	305,177.00	$736,332.30	$2.4128	$3,324,973.00	8,531.20	$80,207.36	$9.4017	104.62	$41,012.06	$392.0097
Lacygne #2				343,866.59	$9,459,829.65	$27.5102	0.00	$0.00		$9,459,829.65						
Jeffrey (KGE)				369,239.42	$9,735,192.10	$26.3655	158,756.00	$386,630.91	$2.4354	$10,121,823.01	3,793.05	$125,384.94	$33.0565			
Murray Gill	2,008,593.00	$1,579,420.02	$0.7863							$1,579,420.02						
Gordon Evans	4,434,138.00	$4,324,413.61	$0.9753							$4,324,413.61						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							261,156.84	$644,567.45	$2.4681	$644,567.45						
Adjustments LAEC												$0.00			$0.00	
Total KGE	7,214,523.00	$6,330,876.84	$0.8775	778,263.15	$21,783,662.45	$27.9901	725,089.84	$1,767,530.66	$2.4377	$29,882,069.95	12,324.25	$205,592.30	$16.6819	104.62	$41,012.06	$392.0097
Total WE	9,295,272.00	$8,137,528.27	$0.8754	2,557,443.54	$70,663,925.74	$27.6307	2,095,688.84	$4,021,988.83	$1.9192	$82,823,442.84	25,979.23	$656,978.07	$25.2886	104.62	$41,012.06	$392.0097
G/L Balance		8,137,528.27			70,663,925.44			4,021,988.83				656,978.07			41,012.06	
Diff		0.00			0.30			0.00				0.00			0.00	

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	(40)	($150.40)	3.7600
Hutch & Abilene DF0033	17,025	$99,138.27	5.8231
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	(17,830)	($67,040.80)	3.7600
Gill & Evans-KGS DF0034	0	$0.00	#DIV/0!
Spring Creek - DF0035	(47)	($176.72)	3.7600
Emporia - DF0036	(43,685)	($164,255.60)	3.7600
Total Gas	(44,577)	($132,485.25)	2.9721
G/L Balance		-$132,485.25	
		$0.00	

Nuclear Fuel a/c 1200000 $74,278,620.11

C:\Users\Owner\Documents\[KCC_305_-_2011_Fuel_Stock_Balances_by_Plant_&_Type.xls]Sep 11

March 2011 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3
After Accruals

13-Dec-11

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				109,327.27	$3,316,587.06	$30.3363	33,332.00	$22,730.42	$0.6819	$3,339,317.48						
Lawrence-PRB				324,071.18	$10,031,142.80	$30.9535				$10,031,142.80						
Jeffrey + MKEC				1,531,645.74	40,849,121.28	$26.6701	547,750.00	$1,333,979.87	$2.4354	$42,183,101.15	15,729.07	$519,643.57	$33.0371			
Hutchinson Steam	2,080,749.00	$1,806,651.43	$0.8683				298,982.00	$353,509.85	$1.1824	$2,160,161.28						
Abilene																
Gordon Evans CT's							466,115.00	$485,645.14	$1.0419	$485,645.14						
Adjustments																
Total KPL	2,080,749.00	$1,806,651.43	$0.8683	1,965,044.19	$54,196,851.14	$27.5805	1,346,179.00	$2,195,865.28	$1.6312	$58,199,367.85	15,729.07	$519,643.57	$33.0371			
Lacygne #1				65,811.82	$2,693,544.61	$40.9280	247,633.00	$654,263.51	$2.6421	$3,347,808.12	7,684.20	$72,371.71	$9.4182	81.32	$32,286.80	$397.0437
Lacygne #2				388,343.63	$11,415,129.98	$29.3944	0.00	$0.00		$11,415,129.98						
Jeffrey (KGE)				423,896.95	$11,306,090.50	$26.6718	152,153.00	$370,549.96	$2.4354	$11,676,640.46	4,369.19	$144,345.44	$33.0371			
Murray Gill	2,008,593.00	$1,579,420.02	$0.7863							$1,579,420.02						
Gordon Evans	4,434,138.00	$4,324,413.61	$0.9753							$4,324,413.61						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							263,572.17	$668,907.35	$2.5379	$668,907.35						
Adjustments LAEC												$0.00			$0.00	
Total KGE	7,214,523.00	$6,330,876.84	$0.8775	878,052.40	$25,414,765.09	$28.9445	663,358.17	$1,693,720.82	$2.5533	$33,439,362.75	12,053.39	$216,717.15	$17.9798	81.32	$32,286.80	$397.0437
Total WE	9,295,272.00	$8,137,528.27	$0.8754	2,843,096.59	$79,611,616.23	$28.0017	2,009,537.17	$3,889,586.10	$1.9356	$91,638,730.60	27,782.46	$736,360.72	$26.5045	81.32	$32,286.80	$397.0437
G/L Balance		8,137,528.27			79,611,615.93			3,889,586.10				736,360.72			32,286.80	
Diff		0.00			0.30			0.00				0.00			0.00	

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	96	$448.18	4.6685
Hutch & Abilene DF0033	185	$889.88	4.8102
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	(19,976)	($80,303.52)	4.0200
Gill & Evans-KGS DF0034	0	$0.00	#DIV/0!
Spring Creek - DF0035	0	$0.00	#DIV/0!
Emporia - DF0036	(5,049)	($20,296.98)	4.0200
Total Gas	(24,744)	($99,262.44)	4.0116
G/L Balance		-$99,262.44	
		$0.00	

Nuclear Fuel a/c 1200000 $73,095,166.10

C:\Users\Owner\Documents\[KCC_306_-_2011_Fuel_Stock_Balances_by_Plant_&_Type.xls]Sep 11

September 2011 FUEL STOCK ENDING BALANCES - ACCOUNTS 151 and 154.3
After Accruals

13-Dec-11

	#6 Oil Gallons	#6 Oil $ 151.1000	#6 Oil $/Gallon	Coal Tons	Coal $ 151.2000	Coal $/Ton	#2 OIL Gallons	#2 OIL $ 151.5000	#2 OIL $/Gallon	Total 151	Limestone Tons	Limestone $ 154.3000	Limestone $/Ton	Ammonia Tons	Ammonia $ 154.3200	Ammonia $/Ton
Tecumseh-PRB				39,791.66	$1,278,596.43	$32.1323	33,332.00	$22,730.42	$0.6819	$1,301,326.85						
Lawrence-PRB				244,773.12	$7,858,098.75	$32.1036				$7,858,098.75	4,189.37	$66,820.53	$15.9500			
Jeffrey + MKEC				1,276,840.79	$36,454,258.12	$28.5504	405,509.00	$1,076,549.81	$2.6548	$37,530,807.93	17,156.71	$570,566.62	$33.2562			
Hutchinson Steam	1,131,833.00	$982,707.68	$0.8682				265,820.00	$314,299.11	$1.1824	$1,297,006.79						
Abilene																
Gordon Evans CT's							464,810.00	$484,285.45	$1.0419	$484,285.45						
Adjustments																
Total KPL	1,131,833.00	$982,707.68	$0.8682	1,561,405.57	$45,590,953.30	$29.1987	1,169,471.00	$1,897,864.79	$1.6228	$48,471,525.77	21,346.08	$637,387.15	$29.8597			
Lacygne #1				32,002.61	$1,453,932.96	$45.4317	320,658.00	$956,982.17	$2.9844	$2,410,915.13	6,866.33	$68,626.50	$9.9946	167.04	$93,856.75	$561.8987
Lacygne #2				227,206.23	$7,516,775.55	$33.0835	0.00	$0.00		$7,516,775.55						
Jeffrey (KGE)				354,316.39	$10,116,319.12	$28.5517	112,641.00	$299,041.62	$2.6548	$10,415,360.74	4,765.75	$158,490.73	$33.2562			
Murray Gill	999,209.00	$785,741.39	$0.7864							$785,741.39						
Gordon Evans	2,845,477.00	$2,775,048.20	$0.9752							$2,775,048.20						
Neosho	771,792.00	$427,043.21	$0.5533							$427,043.21						
Wolf Creek							191,589.32	$523,283.82	$2.7313	$523,283.82						
Adjustments LAEC												$0.00			$0.00	
Total KGE	4,616,478.00	$3,987,832.80	$0.8638	613,525.23	$19,087,027.63	$31.1104	624,888.32	$1,779,307.61	$2.8474	$24,854,168.04	11,632.08	$227,117.23	$19.5251	167.04	$93,856.75	$561.8987
Total WE	5,748,311.00	$4,970,540.48	$0.8647	2,174,930.80	$64,677,980.93	$29.7379	1,794,359.32	$3,677,172.40	$2.0493	$73,325,693.81	32,978.16	$864,504.38	$26.2145	167.04	$93,856.75	$561.8987
G/L Balance		4,970,540.48			64,677,980.63			3,677,172.40				864,504.38			93,856.75	
Diff		0.00			0.30			0.00				0.00			0.00	

GAS DEFERRED ASSET BALANCES - ACCOUNT 186.2003

Check JE8 6810 for Prod Rpt Pages Ending Balances

	MMbtu	Gas Value	$/MMbtu
Tec & Lec DF0037	6,159	$31,553.63	5.1232
Hutch & Abilene DF0033	309	$1,350.28	4.3698
Neosho DF0054	0	$0.00	#DIV/0!
GEEC CT's DF0038	0	$0.00	#DIV/0!
Gill & Evans-W DF0034	13,396	$54,107.50	4.0391
Gill & Evans-KGS DF0034	0	$0.00	#DIV/0!
Spring Creek - DF0035	(288)	($967.95)	3.3609
Emporia - DF0036	4,497	$21,182.28	4.7103
Total Gas	24,073	$107,225.74	4.4542
G/L Balance		$91,287.20	
		-$15,938.54	

Nuclear Fuel a/c 1200000 $76,424,686.60

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Andrew Fry]
Data Request: KCC-307 :: Monthly figures
Date: 0000-00-00

Question 1 (Prepared by Mike Heim)
What do the monthly figures of $5,943,000 represent? What are those figures composed of? 1.Are they Actual Book Numbers? 2.If not, what are they? 3. Why is this number consistently $5,943,000 every month, as opposed to varying?

Response:
1 and 2. The number $5,943,000 in Schedule 6-E was meant to represent the adjusted number 6 Fuel Oil monthly inventory balance. It was calculated as the difference of the actual test year number 6 Fuel Oil inventory book balance of $8,137,528 less the estimated value of the fuel oil to be sold after the test year. In preparing our response to this information request we noticed an input error in the original calculation. The number of barrels associated with the sale of fuel oil from the Gordon Evans Plant was shown as 5,732 barrels. The amount estimated to be sold from Gordon Evans inventory should have been 57,326 barrels. The corrected calculation is attached in file "KCC DR 307 inventory value of #6 Oil". Additionally, we discovered that the monthly inventory balances for number 2 Fuel Oil was inadvertently omitted from Schedule 6-E Fossil Fuel. In the attached file "KCC DR 307 Fossil Fuel Stock with Oil sale deducted" we have corrected the work paper for these two omissions and have calculated the #6 fuel oil estimated balance. Ending inventory balances can be found for both number 2 and number 6 fuel oil on the attachments to KCC DR 305. 3. The $5,943,000 number was constant because no number 6 fuel oil inventory was withdrawn during the test year, therefore the book balance did not change.

Attachment File Name	Attachment Note
KCC DR 307 Fossil Fuel Stock with Oil sale deducted.xls	
KCC DR 307 inventroy value of #6 Oil.xlsx	

As filed:				Schedule 6-E
	#6 Fuel Oil Inventory	Estimated Sale Amount #6 Oil Sale		#6 Fuel Oil Inventory
Mar-10	$ 8,137,528			$ 8,137,528
Apr-10	$ 8,137,528			$ 8,137,528
May-10	$ 8,137,528			$ 8,137,528
Jun-10	$ 8,137,528			$ 8,137,528
Jul-10	$ 8,137,528			$ 8,137,528
Aug-10	$ 8,137,528			$ 8,137,528
Sep-10	$ 8,137,528			$ 8,137,528
Oct-10	$ 8,137,528			$ 8,137,528
Nov-10	$ 8,137,528			$ 8,137,528
Dec-10	$ 8,137,528			$ 8,137,528
Jan-11	$ 8,137,498			$ 8,137,498
Feb-11	$ 8,137,528			$ 8,137,528
Mar-11	$ 8,137,528			$ 8,137,528
Total	$ 105,787,838			$ 105,787,838
13 month average	$ 8,137,526			$ 8,137,526
Adjustment for estimated sale of #6 Oil		$ (2,194,145)		$ (2,194,145)
			Adjusted inventory balance	$ 5,943,381

Corrected Worksheet for Fossil Fuel:					
	#6 Fuel Oil Inventory	#6 Oil Sale inventory value	adjusted #6 Fuel Oil Balance	#2 Fuel Oil Balance	revised Fossil Fuel Balance
Mar-10	$ 8,137,528		$ 8,137,528	$ 3,252,199	$ 11,389,727
Apr-10	$ 8,137,528		$ 8,137,528	$ 3,152,427	$ 11,289,955
May-10	$ 8,137,528		$ 8,137,528	$ 3,120,921	$ 11,258,450
Jun-10	$ 8,137,528		$ 8,137,528	$ 2,982,772	$ 11,120,300
Jul-10	$ 8,137,528		$ 8,137,528	$ 2,886,026	$ 11,023,554
Aug-10	$ 8,137,528		$ 8,137,528	$ 3,491,530	$ 11,629,058
Sep-10	$ 8,137,528		$ 8,137,528	$ 3,566,371	$ 11,703,900
Oct-10	$ 8,137,528		$ 8,137,528	$ 3,256,920	$ 11,394,449
Nov-10	$ 8,137,528		$ 8,137,528	$ 3,211,898	$ 11,349,426
Dec-10	$ 8,137,528		$ 8,137,528	$ 2,991,106	$ 11,128,634
Jan-11	$ 8,137,498		$ 8,137,498	$ 2,879,855	$ 11,017,353
Feb-11	$ 8,137,528		$ 8,137,528	$ 4,021,989	$ 12,159,517
Mar-11	$ 8,137,528		$ 8,137,528	$ 3,889,586	$ 12,027,114
Total	$ 105,787,837.51		$ 105,787,837.51	$ 42,703,601	$ 148,491,438
13 month average	$ 8,137,526		$ 8,137,526	$ 3,284,892	$ 11,422,418
Adjustment for estimated sale of #6 Oil		$ (4,307,570)			$ (4,307,570)
				Adjusted inventory balance	$ 7,114,848

Filed postion:

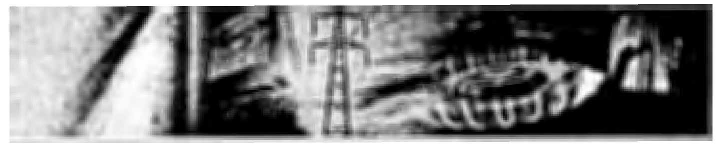
Reduction to inventory balances due to proposed #6 Oil sale

	barrels	brls/gallon	price	value
Neosho	12,702	42	$ 0.5533	$ 295,176.70
Murry Gill	23,169	42	$ 0.7863	$ 765,146.96
Gordon Evans	5,732	42	$ 0.9753	$ 234,797.62
total South				$ 1,295,121.28
Hutchinson	24,652	42	$ 0.8683	$ 899,023.93
total north				$ 899,023.93
total company				$ 2,194,145.21

Corrected calculation:

Reduction to inventory balances due to proposed #6 Oil sale

	barrels	brls/gallon	price	value
Neosho	12,702	42	$ 0.5533	$ 295,176.70
Murry Gill	23,169	42	$ 0.7863	$ 765,146.96
Gordon Evans	57,326	42	$ 0.9753	$ 2,348,222.01
total South				$ 3,408,545.66
Hutchinson	24,652	42	$ 0.8683	$ 899,023.93
total north				$ 899,023.93
total company				$ 4,307,569.59
difference				$ (2,113,424.38)



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Friday, November 18, 2011
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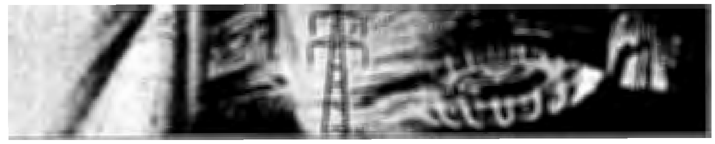
Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Andria Finger]
Data Request: KCC-319 :: Gain on Sale of #6 Oil
Date: 0000-00-00

Question 1 (Prepared by Kevin Kongs)
For the each of the following generating plants (Hutchinson, Murray Gill, Neosho, Gordon Evans) that the #6 Oil is being sold from, Please discuss whether the Oil is/was stored at each plant and what the storage facility is/was. Were the storage facilities included in the original cost of the plant when placed in service (i.e, is/was the cost of the facilities included in Westar's rate base)?

Response:
Number 6 fuel oil is/was stored in large storage tanks located at each of the plants listed above. The tanks were recorded at original cost and included in Westar's rate base from the time the individual tanks were first placed in service.

No Digital Attachments Found.



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Monday, November 21, 2011
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Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Adam Gatewood]
Data Request: KCC-322 :: Update to Section 7
Date: 0000-00-00

Question 1 (Prepared by John Grace)
Please provide an updated section 7 as of October 31, 2011. Describe any new debt or equity issued and debt retired since end of the test year.

Response:
The attached documents include the updated capital structure, pro forma adjustment for shares settled on November 17, 2011, and the updated cost of debt. The cost of preferred equity did not change. The capital structure reflects balances as of October 31, 2011, adjusted for the remaining common shares that were settled on November 17, 2011. The debt balances have been reduced by $180,000 of estate puts that were exercised during August 2011 on the 2033 5% Series of WR Pollution Control Bonds. The cost of debt has been updated to reflect the most recent interest rates on WR and KGE's auction rate securities, which are slightly lower than what was included in the original filing.

Attachment File Name	Attachment Note
COC STUDY 10.31.11 sect7.XLS	
Initial Forward Price Base and Shoe 11.17.11 FINAL.xls	
WACC as of 10.31.11 with proforma adjustments FINAL.xlsx	

Westar Energy, Inc.
WACC with Adjustments
10/31/11 Balances with *pro forma* Adjustments

C:\Users\Marge\AppData\Local\Microsoft\Windows\Temporary Internet Files\Low\Content.IE5\4ZIVKJYU\[WACC_as_of_10.31.11_with_proforma_adjustments_FINAL(1).xlsx]2011

Line #	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
1-5		Adjusted 10/31/2011 Balance	Percent of Capital	Cost of Capital	Weighted Cost of Capital	Taxable Components	Tax Reciprocal	Pretax Weighted Cost of Capital	After-tax Weighted Cost of Capital
6	Long-Term Debt	$ 2,495,002,500	46.9679%	6.6506%	3.1236%			3.1236%	1.8882%
7	Preferred Equity	21,436,300	0.4035%	4.5529%	0.0184%	0.0184%	60.4500%	0.0304%	0.0184%
8	Common Equity	2,795,706,331	52.6286%	10.6000%	5.5786%	5.5786%	60.4500%	9.2285%	5.5786%
9	Total Capitalization Before ITC	$ 5,312,145,131	100.0000%		8.7206%			12.3825%	7.4852%
10									
11									
12									
13									
14	Long-Term Debt	$ 2,495,002,500	46.5145%	6.6506%	3.0935%			3.0935%	1.8700%
15	Preferred Equity	21,436,300	0.3996%	4.5529%	0.0182%	0.0182%	60.4500%	0.0301%	0.0182%
16	Common Equity	2,795,706,331	52.1206%	10.6000%	5.5248%	5.5248%	60.4500%	9.1394%	5.5248%
17	ITC	51,775,480	0.9653%	8.7206%	0.0842%			0.1195%	0.0723%
18	Total Capitalization	$ 5,363,920,611	100.0000%		8.7206%			12.3825%	7.4852%
19									
20									
21	Pre Tax cost of Capital for ITC	12.3825%							
22	ITC Percent of Capital	0.9653%							
23	Pre Tax Cost of ITC	0.1195%							
24									
25	*pro forma* adjustments								
26	Long Term Debt Balance as of 10/31/2011	$ 2,495,002,500							
27	*pro forma* Adjusted Long Term Debt Balance	$ 2,495,002,500							
28									
29	Common Equity Balance as of 10/31/2011	$ 2,598,444,666							
30	*pro forma* Adjustment - JP Morgan primary forward	197,261,665	Shares settled on 11.17.11						
31	*pro forma* Adjusted Common Equity Balance	$ 2,795,706,331							
32									

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Andria Finger]
Data Request: KCC-346 :: Follow up to DR KCC-192 (Gain on Sale of #6 Oil)
Date: 0000-00-00

Question 1 (Prepared by Kevin Kongs)
Regarding the spreadsheet titled "Attachment to KCC-192: Gain on Sale of No. 6 Oil" 1. It appears in the spreadsheet that the sum of the 2008 gain on sale between shareholders and customers totaling $7,621,771.81 (the sum of ledger account 4210000 totaling $4,763,607.40 and ledger account 2540500 totaling $2,858,164.41) was split to reflect 37.50% of the amount allocated to customers in the amount of $2,858,164.41. This amount of $2,858,164 is then reflected in the workpaper included in Data Request No. KCC-1 supporting Westar's Adjustment No. RB-10, and then allocated again by 37.5%. If the total 2008 gain between shareholders and customers equals $7,621,771.81, then why is the net gain on 2008 sale shown on Adjustment No. IS-30 only $2,858,164? 2.Additionally, please reconcile and provide a detailed discussion of why the total 2008 gain of $2,858,164 was used in the calculating Adjustment No. IS-30. 3. If the net gain reflected on Westar's workpaper Adjustment No. IS-30 should be the $7,621,771.81, please provide a corrected workpaper included in Westar's response to Data Request No. KCC-1 related to this adjustment to reflect the correction to this adjustment.

Response:
1. Staff's observation of the 2008 gain on sale of oil is correct. In developing the adjustment that added a 2008 amount previously allocated between customer and company in accordance with the Supreme Courts guidance and the 2011 fuel oil sale, we inadvertently allocated the 2008 sale twice in the work papers. 2. See the response to question 1 above. 3. Attached is a revised work paper correcting the allocation of the 2008 gain on sale of fuel oil. Additionally, we observed the 2011 sale did not include the income taxes owed in calculating the net gain. Both of the corrections are reflected in the revised work paper attached.

Attachment File Name	Attachment Note
KCC-346 Follow Up KCC 192 Gain on #6 Oil Sale.xlsx	

WESTAR ENERGY, INC.
Revenue Requirement Study
Test Year Ended 03/31/2011
Gain on Sale of Excess #6 Oil

Amortization Adjustment to Regulatory Liability		Margin Total	
2008 Gain on Sale of #6 Oil in 2008	$	(2,867,335.51)	
2009 additional expense for 2008 sale of #6 Oil	$	9,171.10	
net gain on 2008 sale	$	(2,858,164)	
2011 sale of #6 Oil - margin	$	(5,688,206)	
expenses through June 2011 related to sale	$	7,555	gas and labor
other estimated expenses related to 2011 sales	$	12,000	gas and labor - estimates
contract labor to install hot taps	$	35,000	contract labor - estimate
	$	(5,633,651)	
total gain from both sales	$	(8,491,816)	
		62.50%	Company percentages
	$	(5,307,385)	Company share of margin
	$	(3,184,431)	Customer's share of margin
adjustment to Section 6	$	(3,184,431)	
		3	amortization period
adjustment to Section 9	$	(1,061,477)	annual amortization amount

WESTAR ENERGY, INC.
Revenue Requirement Study
Test Year Ended 03/31/2011
Gain on Sale of Excess #6 Oil

Westar Energy, Inc.
Schedule for Gain on #6 Oil
For the Test Year Ended March 31, 2011

Amortization Adjustment to Regulatory Liability

2008 Gain on Sale of #6 Oil in 2008		$ (7,646,229)	
2009 additional expense for 2008 sale of #6 Oil		24,456	
Pre-tax gain on 2008 sale		(7,621,773)	
Income Taxes @ 40%		3,048,709	
Net gain on 2008 sale			$ (4,573,064)
2011 sale of #6 Oil - margin		(5,688,206)	
Expenses through June 2011 related to sale	(gas and labor)	7,555	
Other estimated expenses related to 2011 sales	(gas and labor - estimates)	12,000	
Contract labor to install hot taps	(contract labor - estimate)	35,000	
Pre-tax gain on 2011 sales		(5,633,651)	
Income Taxes @ 40%		2,253,461	
Net gain on 2008 sale			(3,380,190)
Total gain on sale of #6 Oil			$ (7,953,254)
Company share of gain (62.50%)			$ (4,970,784)
Customers' share of gain (37.50%)			$ (2,982,470)
Adjustment to section 6			$ (2,982,470)
Amortization period (Years)			3
Adjustment to section 9 - Annual Amortization			$ (994,157)

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Monday, December 12, 2011
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Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Justin Grady]
Data Request: KCC-380 :: Rate Case Expense
Date: 0000-00-00

Question 1 (Prepared by Jim Armstrong)
A. Please provide a listing of all rate case expenses incurred to date, by month, by FERC account, directly related to the filing, preparation, etc. of the current rate case application. B. For each outside vendor retained by the Company for services related to the current rate case (and whose expenses are reflected in part A above), please provide the following: " Invoices supporting all of the expenses incurred in Part A above. " A description of the service provided to Westar, and how it relates to the filing of the rate case. " The amount of time spent on the provision of services and the hourly rate charged for the service. C. Please categorize the total amount of rate case expense to date into the categories used by Westar in pro forma adjustment No. 14. (Rate Design, Accounting Support, Employee Benefit Support, Legal Support, Staff and CURB Consultants, etc.)

Response:
A. The attached spreadsheet, "KCC-380_Rate_Case_Exp_as_of_11-28-2011.xlsx" contains a listing of rate case expenses incurred through November 28, 2011. B. Copies of outside vendor invoices supporting the rate case expense incurred to date are attached as "KCC-380 invoices for rate case expense as of 11-2011.pdf". The description of the services provided, how these services related to the rate case, time spent, and the billing rate charged for services are shown on the attached invoices and/or in the consultant contracts provided in response to CURB-40. C. The expense categories can be found in the far right column of the spreadsheet provided in response to question A above. Please note the Prime Group and Paul Raab provided support for both rate design and accounting issues but are only shown in one category.

Attachment File Name	Attachment Note
KCC-380 invoices for rate case expense as of 11-2011.pdf	
KCC-380_Rate_Case_Exp_as_of_11-28-11.xlsx	

DR KCC-380 - Rate Case Expenses
Account 1823450

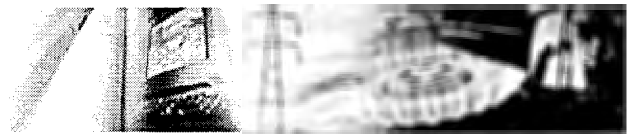
BA	CC	Account	Loc	WA	Project	LE	UC	Date Year	Account Period	Je Group No	Date Je Group	Text Description	Amount	Vendor Number	Invoice Number	Vendor Name	Expenditure Category
6970	G82	1823450	11	6970	DF0076	1		2,011	4	AP	4/15/2011	LOAD RESEARCH FOR 2010 RATE CA	10,840.00	533885102	20110019	HARBOURFRO	Rate Design
6970	G82	1823450	11	6970	DF0076	1		2,011	4	AP	4/12/2011	CONSULTANT WORK ON 2011 RATE C	17,901.90	538312102	INV033111	ARMSTRONGJ	Accounting Support
6970	G21	1823450	11	6970	DF0076	1		2,011	5	AP	5/3/2011	Load Research training Overnig	17.64	525631101	7873	BODINEJOE	Rate Design
6970	G21	1823450	11	6970	DF0076	1		2,011	5	AP	5/3/2011	Load Research training Overnig	7.10	525631101	7873	BODINEJOE	Rate Design
6970	G21	1823450	11	6970	DF0076	1		2,011	5	AP	5/3/2011	Load Research training Overnig	7.50	525631101	7873	BODINEJOE	Rate Design
6970	G21	1823450	11	6970	DF0076	1		2,011	5	AP	5/3/2011	Load Research training Overnig	10.40	525631101	7873	BODINEJOE	Rate Design
6970	G21	1823450	11	6970	DF0076	1		2,011	5	AP	5/3/2011	Load Research training Overnig	7.76	525631101	7873	BODINEJOE	Rate Design
6970	G20	1823450	11	6970	DF0076	1		2,011	5	AP	5/3/2011	Load Research training Tolls	3.35	525631101	7873	BODINEJOE	Rate Design
6970	G20	1823450	11	6970	DF0076	1		2,011	5	AP	5/3/2011	Load Research training Taxi	46.00	525631101	7873	BODINEJOE	Rate Design
6970	G20	1823450	11	6970	DF0076	1		2,011	5	AP	5/3/2011	Load Research training Taxi	25.00	525631101	7873	BODINEJOE	Rate Design
6970	G20	1823450	11	6970	0	1		2,011	5	AP	5/3/2011	Load Research training Parking	28.95	525631101	7873	BODINEJOE	Rate Design
6970	G20	1823450	11	6970	DF0076	1		2,011	5	AP	5/5/2011	Load Research training Hotel -	287.99	524286101	7868	OAKESBOB	Accounting Support
6970	G20	1823450	11	6970	DF0076	1		2,011	5	AP	5/5/2011	Load Research training Airfare	482.80	524286101	7868	OAKESBOB	Accounting Support
6970	E20	1823450	11	6970	DF0076	1		2,011	5	AP	5/5/2011	Weather data for 2011 Rate cas	366.00	524286101	7868	OAKESBOB	Accounting Support
6970	E20	1823450	11	6970	DF0076	1		2,011	5	AP	5/5/2011	Weather Data for 2011 rate cas	42.00	524286101	7868	OAKESBOB	Accounting Support
6970	E20	1823450	11	6970	DF0076	1		2,011	5	AP	5/5/2011	Weather data for 2011 rate cas	(250.00)	524286101	7868	OAKESBOB	Accounting Support
6970	G24	1823450	11	6970	DF0076	1		2,011	5	AP	5/3/2011	Load Research training Mileage	50.49	525631101	7873	BODINEJOE	Rate Design
6970	G82	1823450	11	6970	DF0076	1		2,011	5	AP	5/4/2011	CONSULTANT WORK ON RATE CASE	19,000.00	538312102	INV042911	ARMSTRONGJ	Accounting Support
6970	G82	1823450	11	6970	DF0076	1		2,011	5	AP	5/4/2011	LOAD RESEARCH FOR RATE CASE	19,000.00	533885102	20110022	HARBOURFRO	Rate Design
6970	G20	1823450	11	6970	DF0076	1		2,011	6	AP	6/2/2011	Load Research Training Hotel -	144.01	525631101	9172	BODINEJOE	Rate Design
6970	G82	1823450	11	6970	DF0076	1		2,011	6	AP	6/13/2011	CONSULTANT FEES FOR RATE CASE	14,785.83	531819103	INV060911	PRIMEGROUP	Accounting Support
6970	G82	1823450	11	6970	DF0076	1		2,011	6	AP	6/24/2011	DEPRECIATION STUDY FOR 2011 RA	46,143.86	538359101	1352	FOSTERASSO	Accounting Support
6970	G82	1823450	11	6970	DF0076	1		2,011	6	AP	6/1/2011	CONSULTANT FEES FOR RATE CASE	18,000.00	538312102	INV052611	ARMSTRONGJ	Accounting Support
6970	G82	1823450	11	6970	DF0076	1		2,011	6	AP	6/9/2011	SUPPLIES	216.80	22065101	75107	BARKERPRIN	Accounting Support
6970	G82	1823450	11	6970	DF0076	1		2,011	7	AP	7/11/2011	CONSULTANT FEE FOR LOAD RESEAR	5,160.00	533885102	20110033	HARBOURFRO	Rate Design
6970	G82	1823450	11	6970	DF0076	1		2,011	7	AP	7/20/2011	Develop a report with informat	31,280.00	538485101	2131178	TLGSERVICE	Accounting Support
6970	G82	1823450	11	6970	DF0076	1		2,011	7	AP	7/1/2011	2011 RATE CASE DEVELOPMENT AND	19,000.00	538312102	INV062911	ARMSTRONGJ	Accounting Support
6970	G82	1823450	11	6970	DF0076	1		2,011	7	AP	7/11/2011	CONSULTANT FEE FOR RATE DESIGN	6,600.00	431264103	INV070111	RAABPAULH	Rate Design
6970	G82	1823450	11	6970	DF0076	1		2,011	8	AP	8/10/2011	CONSULTANT WORK ON RATE CASE	6,600.00	431264103	INV080111	RAABPAULH	Rate Design
6970	G82	1823450	11	6970	DF0076	1		2,011	8	AP	8/10/2011	CONSULTANT WORK ON RATE CASE	3,200.00	533885102	20110034	HARBOURFRO	Rate Design
6970	G82	1823450	11	6970	DF0076	1		2,011	8	AP	8/10/2011	CONSULTANT WORK ON RATE CASE	16,690.00	533885102	20110038	HARBOURFRO	Rate Design
6970	G82	1823450	11	6970	DF0076	1		2,011	8	AP	8/11/2011	Develop a report with informat	7,820.00	538485101	2132911	TLGSERVICE	Accounting Support
6970	G82	1823450	11	6970	DF0076	1		2,011	8	AP	8/8/2011	CONSULTANT WORK ON RATE CASE D	19,379.06	538312102	INV080111	ARMSTRONGJ	Accounting Support
6970	G82	1823450	11	6970	DF0076	1		2,011	8	22800BGMKM	8/1/2011	CORRECT COST CODE AND ACCOUNT	(343,181.23)				
6970	G82	1823450	11	6970	DF0076	1		2,011	8	AP	8/24/2011	DEPRECIATION STUDY FOR RATE CA	81,780.58	538359101	1359	FOSTERASSO	Accounting Support
6970	C20	1823450	11	6970	DF0076	1		2,011	8	22800BGMKM	8/1/2011	CORRECT COST CODE AND ACCOUNT	343,181.23				
6970	L30	1823450	11	6970	DF0076	1		2,011	9	GLB-TXINOM	10/6/2011	GLB-TXINOM	61.44				Accounting Support
6702	C47	1823450	11	6702	0	1		2,011	9	AP	9/13/2011	RATE CASE	4,223.70	539134101	INV080411	ANDERSONBY	Legal Support
6702	C47	1823450	11	6702	0	1		2,011	9	AP	9/13/2011	RATE CASE	18,530.36	539134101	INV090111	ANDERSONBY	Legal Support
6970	C20	1823450	11	6970	DF0076	1		2,011	9	AP	9/14/2011	CONSULTANT WORK ON RATE CASE	21,301.00	431264103	INV090111	RAABPAULH	Rate Design
6970	C20	1823450	11	6970	DF0076	1		2,011	9	AP	9/14/2011	CONSULTANT WORK ON 2011 RATE C	14,623.57	531819103	INV090111	PRIMEGROUP	Accounting Support
6970	C20	1823450	11	6970	DF0076	1		2,011	9	AP	9/15/2011	2011 DEPRECIATION RATE STUDY F	87,639.59	538359101	1367	FOSTERASSO	Accounting Support
6970	C20	1823450	11	6970	DF0076	1		2,011	9	AP	9/9/2011	CONSULTANT FEES FOR 2011 RATE	19,750.00	538312102	INV083011	ARMSTRONGJ	Accounting Support
6970	A32	1823450	11	6970	DF0076	1		2,011	9	PR	9/7/2011	HOURLY 110903 14776	26.26				Rate Design
6970	A32	1823450	11	6970	DF0076	1		2,011	9	PR	9/7/2011	HOURLY 110903 14776	262.56				Rate Design
6970	A32	1823450	11	6970	DF0076	1		2,011	9	PR	9/7/2011	HOURLY 110903 14776	393.84				Rate Design
6970	G24	1823450	11	6970	DF0076	1		2,011	10	AP	10/11/2011	Meeting with USD 259, Wichita,	172.05	291199101	13607	ROHLFSDICK	Rate Design
6970	G24	1823450	11	6970	DF0076	1		2,011	10	AP	10/11/2011	Meeting with Spirit, Wichita 9	174.83	291199101	13607	ROHLFSDICK	Rate Design
6970	G20	1823450	11	6970	DF0076	1		2,011	10	AP	10/11/2011	Meeting with USD 259, Wichita,	10.00	291199101	13607	ROHLFSDICK	Rate Design
6970	G20	1823450	11	6970	DF0076	1		2,011	10	AP	10/11/2011	Meeting with Spirit, Wichita,	10.00	291199101	13607	ROHLFSDICK	Rate Design
6702	C47	1823450	11	6702	0	1		2,011	10	AP	10/12/2011	RATE CASE	924.91	539134101	INV100311	ANDERSONBY	Legal Support
6970	C20	1823450	11	6970	0	1		2,011	10	21600BAKLM	10/1/2011	RECLASS DAVEY RESOURCE GROUP I	380.00				Accounting Support

Prepared By:
Eric Anderson

12/12/2011
4:33 PM

6970	C20	1823450	11	6970	DF0076	1		2,011	10	AP	10/7/2011	PROFESSIONAL FEE AND EXPENSES	5,500.00	431264103	INV100111	RAABPAULH	Rate Design
6970	C20	1823450	11	6970	DF0076	1		2,011	10	AP	10/7/2011	RATE CASE DEVELOPMENT & ISSUE	19,000.00	538312102	INV093011	ARMSTRONGJ	Accounting Support
6702	C20	1823450	11	6702	0	1		2,011	10	AP	10/11/2011	TRANSCRIPT	135.00	525370101	1122328	HEDBERGFOS	Rate Design
6970	G82	1823450	11	6970	DF0076	1		2,011	10	AP	10/11/2011	Additional costs to prepare dr	4,544.00	538485101	2134423	TLGSERVICE	Accounting Support
6702	C20	1823450	11	6702	DF0076	1		2,011	11	20100GAEDA	11/1/2011	INV 1122328 TRANSCRIPT	135.00				Legal Support
6970	C20	1823450	11	6970	0	1		2,011	11	20100GAEDA	11/1/2011	INV 905009422 DAVEY RESOURCE	(380.00)				Accounting Support
6970	G82	1823450	11	6970	DF0076	1		2,011	11	AP	11/16/2011	PUBLICATION FEES IN NEWSPAPERS	1,383.10	529769102	229939	SULLIVANHI	Legal Support
6970	G82	1823450	11	6970	DF0076	1	KCC	2,011	11	AP	11/22/2011	DOCKET ASSESSMENT FEES	16,342.25	184778104	2012001686	KANSASCORP	Staff & Curb
6970	G20	1823450	11	6970	0	1		2,011	11	20100GAEDA	11/1/2011	INV 7873 - LOAD RESEARCH TRNIN	(28.95)				Rate Design
6970	G20	1823450	11	6970	DF0076	1		2,011	11	20100GAEDA	11/1/2011	INV 7873 - LOAD RESEARCH TRNIN	28.95				Rate Design
6702	C47	1823450	11	6702	DF0076	1		2,011	11	20100GAEDA	11/1/2011	INV090111 RATE CASE	18,530.36				
6702	C47	1823450	11	6702	DF0076	1		2,011	11	20100GAEDA	11/1/2011	INV080411 RATE CASE	4,223.70				
6702	C47	1823450	11	6702	DF0076	1		2,011	11	20100GAEDA	11/1/2011	INV100311 RATE CASE	924.91				
6702	C47	1823450	11	6702	0	1		2,011	11	20100GAEDA	11/1/2011	INV090111 RATE CASE	(18,530.36)				
6702	C47	1823450	11	6702	0	1		2,011	11	20100GAEDA	11/1/2011	INV080411 RATE CASE	(4,223.70)				
6702	C47	1823450	11	6702	0	1		2,011	11	20100GAEDA	11/1/2011	INV100311 RATE CASE	(924.91)				
6970	C20	1823450	11	6970	0	1	DF0076	2,011	11	AP	11/23/2011	Discovery Support and Respond	7,080.68	538485101	2137243	TLGSERVICE	Accounting Support
6970	C20	1823450	11	6970	DF0076	1		2,011	11	AP	11/1/2011	CONSULTANT RATE CASE DEVELOPME	20,000.00	538312102	INV103111	ARMSTRONGJ	Accounting Support
6970	C20	1823450	11	6970	DF0076	1	HARBOR	2,011	11	AP	11/8/2011	SAMPLE EXPANSION WORK FOR A RE	6,310.00	533885102	20110042	HARBOURFRO	Rate Design
6970	C20	1823450	11	6970	DF0076	1	HARBOR	2,011	11	AP	11/8/2011	PERFORMANCE OF UPDATE OF THE S	16,690.00	533885102	20110043	HARBOURFRO	Rate Design
6970	C20	1823450	11	6970	DF0076	1		2,011	11	20100GAEDA	11/1/2011	INV 905009422 DAVEY RESOURCE	380.00				Accounting Support
6702	C20	1823450	11	6702	0	1		2,011	11	20100GAEDA	11/1/2011	INV 1122328 TRANSCRIPT	(135.00)				Legal Support
6970	G82	1823450	11	6970	DF0076	1		2,011	11	AP	11/16/2011	PUBLICATION FEES IN NEWSPAPERS	15,453.64	529769102	229939	SULLIVANHI	Legal Support
6970	G82	1823450	11	6970	DF0076	1		2,011	11	AP	11/2/2011	PUBLIC HEARING BILL INSERTS, O	9,747.99	226200101	35472	MAINLINEPR	Legal Support
													635,345.79				

energytools, llc. DATA REQUEST EASY ACCESS MANAGEMENT SYSTEM



Home Page Change Password

Tuesday, January 03, 2012
Logged in as: [**Andrea Crane**] Logout

Docket: [12-WSEE-112-RTS] 2011 Rate Case
Requestor: [KCC] [Bob Glass]
Data Request: KCC-399 :: Wholesale non-fuel revenue in the RECA
Date: 0000-00-00

Question 1 (Prepared by Linda Haines)
(1) Is it true that the RECA WR factor contains non-fuel revenues only from entities with long-term full requirements contracts that contain a fuel adjustment provision? If so, please provide the parameters for the phrase "long-term"? (2) Please provide for each of the contracts for the entities whose wholesale revenue goes into the RECA WR factor the name of the entity, the length of the contract, and the date that the contract went into effect. (3) Were there any additions to the number of entities whose wholesale non-fuel revenue goes into the RECA WR factor during the test year? (4) Are there any more wholesale customers that could sign long-term full requirements contracts that contain a fuel adjustment provision and have not up to now? If so, please name them. (5) Are there any more wholesale customers that have discussed signing long-term full requirements contracts that contain a fuel adjustment provision? If so please name them and when this contract might go into effect.

Response:
1.) Yes. The contracts have a term greater than or equal to 10 years in length. 2.) The attached file contains the name of the entity, length of the contract, and effective date of the contract for each generation formula rate customer. 3.) Yes. 4.) Yes. Herington has signed a full requirements contract customer with an effective date of March 1, 2012 and Scranton, a former Kansas Power Pool member customer, will become a full requirements contract customer effective November 1, 2012. 5.) No. However, Wamego will become a wholesale customer with a Units Most Likely (UML) contract effective June 1, 2012. This type of contract does not contract for system wide energy. Rather Wamego would contract for available resources after all full requirement customers' needs are met. Thus the fuel cost is priced above system average and these type of contracts are addressed in the non-requirements cost to achieve component of the RECA. Additionally, Eudora could possibly no longer be one of our customers as of May 31, 2013 or it could also become a non-requirements customer taking service under a UML type contract.

Attachment File Name	Attachment Note
DR399RespWholesaleContracts.xls	

FERC Tariff Reference	Contract Service Agreement ID	Contract Execution date	Contract Commencement date	Contract Termination date	Extension
Valid FERC Designation		YYYYMMDD	YYYYMMDD	YYYYMMDD	Text Field
FERC Electric Tariff, First Rev. Vol. No. 20	SA 10	20090901	20100831	20241130	None
First Rev. Rate Schedule FERC No. 321	ARMGFR	20090610	20110501	20190731	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 7	20090817	20100831	20191130	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 1	20090724	20100831	20291130	None
First Rev. Rate Schedule FERC No. 330	BURUML	20091019	20110501	20111231	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 2	20090804	20100831	20191130	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 14	20091103	20100831	20251231	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 16	20100304	20100831	20300531	None
First Rev. Rate Schedule FERC No. 236	EUD1	19930315	20020619	20130601	None
First Rev. Rate Schedule FERC No. 209	HER1	19920625	20020619	20120301	Will be replaced with 10-year GFR
FERC Electric Tariff, First Rev. Vol. No. 20	SA 6	20090812	20100831	20191130	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 18	20100322	20100831	20200531	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 4	20090810	20100831	20291130	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 9	20090818	20100831	20191130	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 17	20100517	20100831	20300531	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 5	20090811	20100831	20291130	None
Rate Schedule FERC No. 337	MULVUML	20100301	20100601	20150531	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 19	20100913	20110101	20251231	None
Rate Schedule FERC No. 348	OSAUML	20110412	20110615	20131213	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 11	20090908	20100831	20291130	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 20	20090908	20100831	20291130	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 8	20111206	20120111	202211031	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 15	20100114	20100831	20200331	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 3	20090804	20100831	20291130	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 13	20090909	20100831	20291130	None
First Rev. Rate Schedule FERC No. 184	WAM1	19930302	20020619	20120531	None
FERC Electric Tariff, First Rev. Vol. No. 20	SA 12	20090908	20100831	20241130	None
Rate Schedule FERC No. 326	DECA	20090929	20100601	20190929	None
Rate Schedule FERC No. 341	KCPLUML	20100429	20101001	20200429	None
First Rev. Rate Schedule FERC No. 301	KEPCGFR	20070806	20110801	20451231	Year to Year
Rate Schedule FERC No. 327	KVEC	20090929	20100601	20190929	None
Rate Schedule FERC No. 335	MWEUML	20100118	20100601	20160531	None
Rate Schedule FERC No. 328	NMECA	20090929	20100601	20190929	None

CERTIFICATE OF SERVICE

12-WSEE-112-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, electronic service, or hand-delivered this 5th day of January, 2012, to the following:

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