

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

Before Commissioners: Pat Apple, Chairman  
Shari Feist Albrecht  
Jay Scott Emler

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

**ORDER GRANTING IN PART, DENYING IN PART THE PETITION FOR  
RECONSIDERATION OF SUNFLOWER ELECTRIC POWER CORPORATION AND  
MID-KANSAS ELECTRIC COMPANY, LLC; ORDER GRANTING IN PART,  
DENYING IN PART THE KANSAS POWER POOL'S PETITION FOR  
RECONSIDERATION**

This matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed the pleadings and record, the Commission makes the following findings:

1. On August 25, 2017, Westar Energy, Inc. and Kansas Gas and Electric Company (Westar), Great Plains Energy Incorporated (Great Plains) and Kansas City Power & Light Company (KCP&L) filed an Application seeking approval to merge. The Applicants intend to form a new, publicly traded holding company with a combined equity value of approximately \$14 billion, which will operate regulated electric utilities in Kansas and Missouri.<sup>1</sup> Westar and KCP&L would become wholly-owned subsidiaries of the new holding company.<sup>2</sup> As proposed, Westar shareholders will own approximately 52.5% of the combined company with Great Plains' shareholders owning the remaining 47.5% of the combined company.<sup>3</sup>

---

<sup>1</sup> Application, Aug. 25, 2017, ¶¶ 9-10.

<sup>2</sup> *Id.*, ¶ 10.

<sup>3</sup> *Id.*, ¶ 11.

2. On September 12, 2017, the Kansas Power Pool (KPP) filed a Petition to Intervene, claiming its members will or may be bound by any Commission order or activity in this proceeding because: (1) KPP has a Purchase Power Agreement with Westar for 59 megawatts of power from the Jeffrey Energy Center; and (2) KPP's power supply is dependent upon Westar's transmission system for delivery to its members.<sup>4</sup>

3. On September 15, 2017, Midwest Energy, Inc. (Midwest) filed a Petition to Intervene, stating it is a long-standing large volume customer of Westar and purchases support services related to its participation in the SPP Integrated Market.<sup>5</sup>

4. On October 12, 2017, the Commission issued an Order Granting Intervention to the Kansas Power Pool and Midwest Energy, Inc., explaining in part, "pursuant to K.S.A. 77-521(c)(3), the Commission finds it appropriate to condition Midwest's intervention on requiring them to combine their activities with the KPP in this Docket, including their presentations of evidence, argument, cross-examination, discovery, and other participation in the proceedings."<sup>6</sup>

5. On October 26, 2017, KPP filed a Petition to Reconsider Conditions of Intervention, claiming "it will not be unreasonably burdensome or repetitious to allow individual discovery, presentation of evidence, argument and cross-examination by KPP and Midwest, nor will such independent participation disrupt the orderly and prompt conduct of the proceeding."<sup>7</sup>

6. Midwest did not challenge the Commission's Order Granting Intervention to the Kansas Power Pool and Midwest Energy, Inc. Since KPP filed its Petition to Reconsider, the Commission issued an Order Granting Sunflower Electric and Mid-Kansas' Petition to Intervene, which conditions Sunflower's, Mid-Kansas's, KPP's and Midwest Energy's intervention on

---

<sup>4</sup> Petition of the Kansas Power Pool to Intervene, Sept. 12, 2017, ¶¶ 4-6.

<sup>5</sup> Petition to Intervene of Midwest Energy, Inc., Sep. 15, 2017, ¶ 3.

<sup>6</sup> Order Granting Intervention to the Kansas Power Pool and Midwest Energy, Inc., Oct. 12, 2017, ¶ 8.

<sup>7</sup> Petition of the Kansas Power Pool to Reconsider Conditions of Intervention (KPP PFR), Oct. 26, 2017, ¶ 10.

requiring them to combine their activities in this Docket, including their presentations of evidence, argument, cross-examination, discovery, and other participation in the proceedings.<sup>8</sup> On November 15, 2017, Sunflower and Mid-Kansas filed their Petition for Reconsideration, citing the Commission's approach in the 16-KCPE-593-ACQ Docket (16-593 Docket), where Great Plains Energy and KCP&L unsuccessfully attempted to acquire Westar.<sup>9</sup> In the 16-593 Docket, Sunflower and Mid-Kansas were allowed to propound discovery individually and submit individual briefs on issues specific to them, provided they avoided filing repetitive briefs.<sup>10</sup> As noted by Sunflower and Mid-Kansas, no party to the 16-593 Docket objected to that arrangement and it did not impair the interests of justice.<sup>11</sup>

7. KPP recognizes under K.S.A. 77-521(c), the standard is whether combining the intervenors' participation would promote the orderly and prompt conduct of the proceedings. In the proposed procedural schedules before the Commission, the Applicants have suggested seven days for the evidentiary hearing, whereas the Kansas Industrial Consumers Group, Inc. (KIC) has suggested a schedule with eight days for the evidentiary hearing.<sup>12</sup> KPP has endorsed KIC's proposed schedule.<sup>13</sup> Either schedule requires an efficient presentation of evidence. Presently, there are 22 parties participating in the Docket. Due to the number of parties in the Docket and the complexity of the Docket, some consolidation is necessary to complete the evidentiary hearing in the proposed seven-day window.

---

<sup>8</sup> Order Granting Sunflower Electric and Mid-Kansas' Petition to Intervene, Oct. 31, 2017, ¶ 5.

<sup>9</sup> Petition for Reconsideration (Sunflower PFR), Nov. 15, 2017, ¶ 12.

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> See Motion for Procedural Schedule, Oct. 12, 2017, ¶ 3; Motion for Procedural Schedule and Response in Opposition to Applicants' Proposed Schedule, Oct. 16, 2017, ¶ 10.

<sup>13</sup> Response of the Kansas Power Pool to Motion for Procedural Schedule, Oct. 19, 2017, ¶ 6.

8. The Commission's grouping of Sunflower, Mid-Kansas, KPP and Midwest is consistent with the Commission's approach in the 16-593 Docket.<sup>14</sup> In the 16-593 Docket, KPP, Sunflower, Mid-Kansas, and Midwest sought reconsideration of their groupings.<sup>15</sup> One of the arguments made was the Commission failed to provide evidence that combining participation would alleviate burdensome and repetitious action.<sup>16</sup> But as the Commission explained in the 16-593 Docket, "that is not the standard. The appropriate standard is whether combining the intervenor's participation would promote the orderly and prompt conduct of the proceedings. Consolidating the intervenors will certainly promote a more orderly and prompt proceeding."<sup>17</sup> The same remains true today.

9. Consistent with its decision in the 16-593 Docket, the Commission agrees that the parties need the ability to conduct their own discovery and grants Sunflower and Mid-Kansas's Petition for Reconsideration and KPP's Petition for Reconsideration for the limited purpose of allowing each of the intervenors to propound discovery individually and to submit individual briefs on issues specific to them, provided they avoid filing repetitive briefs.<sup>18</sup> The Commission's main concern is keeping the evidentiary hearing manageable despite the large number of parties.<sup>19</sup> Allowing each party to conduct discovery should not interfere with conducting the evidentiary hearing in an orderly or prompt fashion.<sup>20</sup>

---

<sup>14</sup> See Order Granting in Part, Denying in Part Petitions for Reconsideration by Kansas Power Pool; Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC; and Midwest Energy, Inc. (16-593 Order on PFR), 16-KCPE-593-ACQ, Sept. 22, 2016, ¶5.

<sup>15</sup> *Id.*, ¶ 6.

<sup>16</sup> *Id.*, ¶ 10.

<sup>17</sup> *Id.*

<sup>18</sup> See *id.*, ¶ 15; Sunflower PFR, p. 8.

<sup>19</sup> 16-593 Order on PFR, ¶ 15.

<sup>20</sup> *Id.*

**THEREFORE, THE COMMISSION ORDERS:**

A. Each intervenor is permitted to propound discovery individually. To the extent possible, the consolidated parties should submit joint post-hearing briefs. The consolidated parties should avoid filing repetitive briefs, but can submit individual briefs on issues specific to them. In all other respects, Sunflower and Mid-Kansas's and KPP's Petition for Reconsideration are denied.

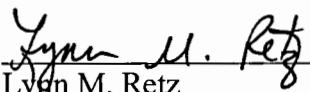
B. This Order constitutes non-final agency action.<sup>21</sup> Any request for review of this action shall be in accordance with K.S.A. 77-608 and K.S.A. 77-613. Lynn M. Retz, Secretary to the Commission, is designated by the Commission to receive service of a petition for judicial review.<sup>22</sup>

C. The Commission retains jurisdiction over the subject matter and the parties for the purpose of entering such further orders as it deems necessary.

**BY THE COMMISSION IT IS SO ORDERED.**

Apple, Chairman; Albrecht, Commissioner; Emler, Commissioner

Dated: NOV 21 2017

  
Lynn M. Retz  
Secretary to the Commission

BGF

**EMAILED**

NOV 21 2017

---

<sup>21</sup> K.S.A. 77-607(b)(2).

<sup>22</sup> K.S.A. 77-613(e).

## CERTIFICATE OF SERVICE

18-KCPE-095-MER

I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of

Electronic Service on NOV 21 2017.

MICHAEL E. AMASH, ATTORNEY  
BLAKE & UHLIG PA  
SUITE 475 NEW BROTHERHOOD BLDG  
753 STATE AVE.  
KANSAS CITY, KS 66101  
Fax: 913-321-2396  
mea@blake-uhlig.com

MARTIN J. BREGMAN  
BREGMAN LAW OFFICE, L.L.C.  
311 PARKER CIRCLE  
LAWRENCE, KS 66049  
mjb@mjbregmanlaw.com

ANDREW J ZELLERS, GEN COUNSEL/VP REGULATORY  
AFFAIRS  
BRIGHTERGY, LLC  
1712 MAIN ST 6TH FLR  
KANSAS CITY, MO 64108  
Fax: 816-511-0822  
andy.zellers@brightergy.com

GLENDA CAFER, ATTORNEY  
CAFER PEMBERTON LLC  
3321 SW 6TH ST  
TOPEKA, KS 66606  
Fax: 785-233-3040  
glenda@caferlaw.com

TERRI PEMBERTON, ATTORNEY  
CAFER PEMBERTON LLC  
3321 SW 6TH ST  
TOPEKA, KS 66606  
Fax: 785-233-3040  
terri@caferlaw.com

CARY CATCHPOLE, ACCOUNTANT/ECONOMIST  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3116  
c.catchpole@curb.kansas.gov

THOMAS J. CONNORS, ATTORNEY AT LAW  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3116  
tj.connors@curb.kansas.gov

TODD E. LOVE, ATTORNEY  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3116  
t.love@curb.kansas.gov

DAVID W. NICKEL, CONSUMER COUNSEL  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3116  
d.nickel@curb.kansas.gov

DELLA SMITH  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3116  
d.smith@curb.kansas.gov

## CERTIFICATE OF SERVICE

18-KCPE-095-MER

SHONDA SMITH  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3116  
sd.smith@curb.kansas.gov

JONATHAN LESSER  
CONTINENTAL ECONOMICS, INC.  
6 REAL PLACE  
SCANDIA PARK, NM 87047  
jlesser@continentalecon.com

DANIEL R. ZMIJEWSKI  
DRZ LAW FIRM  
9229 WARD PARKWAY STE 370  
KANSAS CITY, MO 64114  
Fax: 816-523-5667  
dan@drzlawfirm.com

ASHLEY M. BOND, ATTORNEY  
DUNCAN & ALLEN  
1730 RHODE ISLAND AVENUE NW  
SUITE 700  
WASHINGTON, DC 20036-3155  
Fax: 202-289-8450  
amb@duncanallen.com

KENNETH M. HOLMBOE, ATTORNEY AT LAW  
DUNCAN & ALLEN  
1730 RHODE ISLAND AVENUE NW  
SUITE 700  
WASHINGTON, DC 20036-3155  
Fax: 202-289-8450  
kh@duncanallen.com

GREGG D. OTTINGER, ATTORNEY  
DUNCAN & ALLEN  
1730 RHODE ISLAND AVENUE NW  
SUITE 700  
WASHINGTON, DC 20036-3155  
Fax: 202-289-8450  
gdo@duncanallen.com

SHANNON FISK, ATTORNEY  
EARTHJUSTICE  
1617 JOHN F KENNEDY BLVD  
SUITE 1675  
PHILADELPHIA, PA 19103  
sfisk@earthjustice.org

SARAH STEELE  
GILMORE & BELL, P.C.  
ONE MAIN PLACE  
100 NORTH MAIN, STE. 800  
WICHITA, KS 67202  
ssteele@gilmorebell.com

DARRELL MCCUBBINS, BUSINESS MANAGER  
IBEW LOCAL UNION NO. 1464  
1760 UNIVERSAL AVENUE  
KANSAS CITY, MO 64120  
Fax: 816-483-4239  
kwhiteman@ibew1464.org

DAVID PINON, BUSINESS MANAGER  
IBEW LOCAL UNION NO. 1613  
6900 EXECUTIVE DR  
SUITE 180  
KANSAS CITY, MO 64120  
local1613@earthlink.net

RANDY ADAMS, BUSINESS MANAGER  
IBEW LOCAL UNION NO. 412  
1760 UNIVERSAL AVENUE  
KANSAS CITY, MO 64120  
Fax: 816-231-5515  
business.manager@ibew412.org

JOHN KRAJEWSKI, PRESIDENT  
J K ENERGY CONSULTING LLC  
650 J STREET STE 108  
LINCOLN, NE 68508  
Fax: 402-438-4322  
jk@jkenergyconsulting.com

## **CERTIFICATE OF SERVICE**

18-KCPE-095-MER

ALAN I. ROBBINS, ATTORNEY  
JENNINGS, STROUSS & SALMON, P.L.C  
1350 I Street, NW  
Suite 810  
WASHINGTON, DC 20005  
Fax: 202-408-5406  
arobbins@jsslaw.com

ANDREA I. SARMENTERO GARZON  
JENNINGS, STROUSS & SALMON, P.L.C  
1350 I Street, NW  
Suite 810  
WASHINGTON, DC 20005  
Fax: 202-371-9025  
asarmentero@jsslaw.com

ANGELA LAWSON, SENIOR COUNSEL  
KANSAS CITY KANSAS BOARD OF PUBLIC UTILITIES  
540 MINNESOTA AVENUE  
KANSAS CITY, KS 66101-2930  
alawson@bpu.com

DARRIN R. IVES, VICE PRESIDENT, REGULATORY  
AFFAIRS  
KANSAS CITY POWER & LIGHT COMPANY  
ONE KANSAS CITY PL, 1200 MAIN ST 31ST FLOOR (64105  
PO BOX 418679  
KANSAS CITY, MO 64141-9679  
Fax: 816-556-2110  
darrin.ives@kcpl.com

NICOLE A. WEHRY, SENIOR REGULATORY  
COMMUNICATIONS SPECIALIST  
KANSAS CITY POWER & LIGHT COMPANY  
ONE KANSAS CITY PL, 1200 MAIN ST 31ST FLOOR (64105  
PO BOX 418679  
KANSAS CITY, MO 64141-9679  
Fax: 816-556-2787  
nicole.wehry@kcpl.com

BRIAN G. FEDOTIN, DEPUTY GENERAL COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604-4027  
Fax: 785-271-3314  
b.fedotin@kcc.ks.gov

DEBRA D. ROBY, ATTORNEY  
JENNINGS, STROUSS & SALMON, P.L.C  
1350 I Street, NW  
Suite 810  
WASHINGTON, DC 20005  
Fax: 202-371-9025  
droby@jsslaw.com

SUSAN ALIG, ASSISTANT COUNSEL  
KANSAS CITY KANSAS BOARD OF PUBLIC UTILITIES  
701N 7TH STREET  
KANSAS CITY, KS 66101  
Fax: 913-573-5243  
salig@wycokck.org

ROBERT J. HACK, LEAD REGULATORY COUNSEL  
KANSAS CITY POWER & LIGHT COMPANY  
ONE KANSAS CITY PL, 1200 MAIN ST 31ST FLOOR (64105  
PO BOX 418679  
KANSAS CITY, MO 64141-9679  
Fax: 816-556-2787  
rob.hack@kcpl.com

ROGER W. STEINER, CORPORATE COUNSEL  
KANSAS CITY POWER & LIGHT COMPANY  
ONE KANSAS CITY PL, 1200 MAIN ST 31ST FLOOR (64105  
PO BOX 418679  
KANSAS CITY, MO 64141-9679  
Fax: 816-556-2787  
roger.steiner@kcpl.com

ANTHONY WESTENKIRCHNER, SENIOR PARALEGAL  
KANSAS CITY POWER & LIGHT COMPANY  
ONE KANSAS CITY PL, 1200 MAIN ST 31ST FLOOR (64105  
PO BOX 418679  
KANSAS CITY, MO 64141-9679  
Fax: 816-556-2787  
anthony.westenkirchner@kcpl.com

DUSTIN KIRK, DEPUTY GENERAL COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604-4027  
Fax: 785-271-3354  
d.kirk@kcc.ks.gov



## CERTIFICATE OF SERVICE

18-KCPE-095-MER

MICHAEL NEELEY, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604-4027  
Fax: 785-271-3167  
m.neeley@kcc.ks.gov

AMBER SMITH, CHIEF LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604-4027  
Fax: 785-271-3167  
a.smith@kcc.ks.gov

MARK DOLJAC, DIR RATES AND REGULATION  
KANSAS ELECTRIC POWER CO-OP, INC.  
600 SW CORPORATE VIEW (66615)  
PO BOX 4877  
TOPEKA, KS 66604-0877  
Fax: 785-271-4888  
mdoljac@kepco.org

WILLIAM G. RIGGINS, GENERAL COUNSEL  
KANSAS ELECTRIC POWER CO-OP, INC.  
600 SW CORPORATE VIEW (66615)  
PO BOX 4877  
TOPEKA, KS 66604-0877  
Fax: 785-271-4884  
briggins@kepco.org

JAMES GING, DIRECTOR ENGINEERING SERVICES  
KANSAS POWER POOL  
100 N BROADWAY STE L110  
WICHITA, KS 67202  
Fax: 888-431-4943  
jging@kpp.agency

LARRY HOLLOWAY, ASST GEN MGR OPERATIONS  
KANSAS POWER POOL  
100 N BROADWAY STE L110  
WICHITA, KS 67202  
Fax: 888-431-4943  
lholloway@kpp.agency

ROBERT V. EYE, ATTORNEY AT LAW  
KAUFFMAN & EYE  
4840 Bob Billings Pkwy, Ste. 1010  
Lawrence, KS 66049-3862  
Fax: 785-749-1202  
bob@kauffmaneye.com

JOHN MICHAEL ADRAGNA ESQ.  
MCCARTER ENGLISH, LLP  
1015 15TH STREET, NW  
12TH FLOOR  
WASHINGTON, DC 20005  
Fax: 202-296-0166  
jadragna@mccarter.com

KIMBERLY BRICKELL FRANK ESQ.  
MCCARTER ENGLISH, LLP  
1015 15TH STREET, NW  
12TH FLOOR  
WASHINGTON, DC 20005  
Fax: 202-296-0166  
kfrank@mccarter.com

WILLIAM DOWLING, VP ENGINEERING & ENERGY  
SUPPLY  
MIDWEST ENERGY, INC.  
1330 CANTERBURY ROAD  
PO BOX 898  
HAYS, KS 67601-0898  
Fax: 785-625-1487  
bdowling@mwenergy.com

EARNEST A. LEHMAN, PRESIDENT & GENERAL  
MANAGER  
MIDWEST ENERGY, INC.  
1330 Canterbury Rd  
PO Box 898  
Hays, KS 67601-0898  
elehman@mwenergy.com

ANNE E. CALLENBACH, ATTORNEY  
POL SINELLI PC  
900 W 48TH PLACE STE 900  
KANSAS CITY, MO 64112  
Fax: 913-451-6205  
acallenbach@polsinelli.com

## CERTIFICATE OF SERVICE

18-KCPE-095-MER

FRANK A. CARO, JR., ATTORNEY  
POL SINELLI PC  
900 W 48TH PLACE STE 900  
KANSAS CITY, MO 64112  
Fax: 816-753-1536  
fcaro@polsinelli.com

BORIS STEFFEN  
RMS US LLP  
1861 INTERNATIONAL DRIVE  
SUITE 400  
MCLEAN, VA 22102  
boris.steffen@rsmus.com

SUNIL BECTOR, ATTORNEY  
SIERRA CLUB  
2101 WEBSTER, SUITE 1300  
OAKLAND, CA 94312-3011  
Fax: 510-208-3140  
sunil.bector@sierraclub.org

ANDREW J. FRENCH, ATTORNEY AT LAW  
SMITHYMAN & ZAKOURA, CHTD.  
7400 W 110TH ST STE 750  
OVERLAND PARK, KS 66210-2362  
Fax: 913-661-9863  
andrew@smizak-law.com

JAMES P. ZAKOURA, ATTORNEY  
SMITHYMAN & ZAKOURA, CHTD.  
7400 W 110TH ST STE 750  
OVERLAND PARK, KS 66210-2362  
Fax: 913-661-9863  
jim@smizak-law.com

RENEE BRAUN, CORPORATE PARALEGAL, SUPERVISOR  
SUNFLOWER ELECTRIC POWER CORPORATION  
301W. 13TH  
PO BOX 1020 (67601-1020)  
HAYS, KS 67601  
Fax: 785-623-3395  
rbraun@sunflower.net

JAMES BRUNGARDT, MANAGER, REGULATORY  
RELATIONS  
SUNFLOWER ELECTRIC POWER CORPORATION  
301W. 13TH  
PO BOX 1020 (67601-1020)  
HAYS, KS 67601  
Fax: 785-623-3395  
jbrungardt@sunflower.net

DAVIS ROONEY, VICE PRESIDENT AND CFO  
SUNFLOWER ELECTRIC POWER CORPORATION  
301W. 13TH  
PO BOX 1020 (67601-1020)  
HAYS, KS 67601  
Fax: 785-623-3395  
hrooney@sunflower.net

AL TAMIMI, VICE PRESIDENT, TRANSMISSION PLANNING  
AND POLICY  
SUNFLOWER ELECTRIC POWER CORPORATION  
301W. 13TH  
PO BOX 1020 (67601-1020)  
HAYS, KS 67601  
Fax: 785-623-3395  
atamimi@sunflower.net

AMY FELLOWS CLINE, ATTORNEY  
TRIPLETT, WOOLF & GARRETSON, LLC  
2959 N ROCK RD STE 300  
WICHITA, KS 67226  
Fax: 316-630-8101  
amycline@twgfirm.com

TIMOTHY E. MCKEE, ATTORNEY  
TRIPLETT, WOOLF & GARRETSON, LLC  
2959 N ROCK RD STE 300  
WICHITA, KS 67226  
Fax: 316-630-8101  
temckee@twgfirm.com

MARK D. CALCARA, ATTORNEY  
WATKINS CALCARA CHTD.  
1321 MAIN ST STE 300  
PO DRAWER 1110  
GREAT BEND, KS 67530  
Fax: 620-792-2775  
mcalcara@wcrf.com

**CERTIFICATE OF SERVICE**

18-KCPE-095-MER

TAYLOR P. CALCARA, ATTORNEY  
WATKINS CALCARA CHTD.  
1321 MAIN ST STE 300  
PO DRAWER 1110  
GREAT BEND, KS 67530  
Fax: 620-792-2775  
tcalcara@wcrf.com

JEFFREY L. MARTIN, VICE PRESIDENT, REGULATORY  
AFFAIRS  
WESTAR ENERGY, INC.  
818 S KANSAS AVE  
PO BOX 889  
TOPEKA, KS 66601-0889  
jeff.martin@westarenergy.com

CATHRYN J. DINGES, SENIOR CORPORATE COUNSEL  
WESTAR ENERGY, INC.  
818 S KANSAS AVE  
PO BOX 889  
TOPEKA, KS 66601-0889  
Fax: 785-575-8136  
cathy.dinges@westarenergy.com

DAVID L. WOODSMALL  
WOODSMALL LAW OFFICE  
308 E HIGH ST STE 204  
JEFFERSON CITY, MO 65101  
Fax: 573-635-7523  
david.woodsmall@woodsmallllaw.com

/s/ DeeAnn Shupe  
DeeAnn Shupe

---

***EMAILED***

NOV 21 2017