

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In The Matter of The Joint Application)
Of Great Plains Energy Incorporated,)
Kansas City Power And Light Company) KCC Docket No. 16-KCPE-593-ACQ
And Westar Energy, Inc. For Approval)
Of The Acquisition of Westar Energy, Inc.)
By Great Plains Energy Incorporated)

DIRECT TESTIMONY OF
STACEY HARDEN
ON BEHALF OF
CITIZENS' UTILITY RATEPAYER BOARD

DECEMBER 16, 2016

1 **I. STATEMENT OF QUALIFICATIONS**

2 **Q. Please state your name and business address.**

3 A. My name is Stacey Harden. My business address is 1700 SW College Ave, Topeka,
4 Kansas 66621.

5
6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by Washburn University as the Sponsored Projects Accountant.

8
9 **Q. Please describe your educational background.**

10 A. I earned a Bachelor of Business Administration degree from Baker University in 2001. I
11 earned a Master of Business Administration degree from Baker University in 2004.

12
13 **Q. Please summarize your professional experience in the utility industry.**

14 A. I served as a Regulatory Analyst for the Citizens' Utility Ratepayer Board from February
15 2008 until March 2016. Prior to joining CURB, I was the manager of a rural water district
16 in Shawnee County, Kansas for five years.

17
18 **Q. Have you previously testified before the Commission?**

19 A. Yes. I have previously offered testimony in KCC Docket Nos. 08-WSEE-1041-RTS, 10-
20 KGSG-421-TAR, 10-EPDE-497-TAR, 10-BHCG-639-TAR, 10-SUBW-602-TAR, 10-
21 WSEE-775-TAR, 10-KCPE-795-TAR, 10-KCPE-415-RTS, 11-SUBW-448-RTS, 12-
22 SUBW-359-RTS, 12-MKEE-410-RTS, 12-MKEE-491-RTS, 13-HHIW-570-RTS, 14-
23 WSEE-148-TAR, 14-ATMG-230-TAR, 15-WSEE-181-TAR, 15-KCPE-116-RTS, 15-

1 SPEE-519-RTS, 16-KCPE-446-TAR, and 16-EPDE-410-ACQ. I have also authored
2 Report and Recommendations to the Commission in 13-HHIW-570-RTS, 14-KCPE-042-
3 TAR, and 15-WSEE-021-TAR.

4
5 **Q. What is the purpose of your testimony?**

6 A. On June 28, 2016, Great Plains Energy, Inc. (“GPE”), Kansas City Power & Light
7 Company (“KCP&L”), and Westar Energy, Inc. (“Westar”, collectively “Joint
8 Applicants”) filed an Application with the Kansas Corporation Commission (“KCC” or
9 “Commission”) seeking approval for the acquisition of Westar by GPE, the parent
10 company of KCP&L. I was engaged by the Citizens’ Utility Ratepayer Board (“CURB”)
11 to review the Application and to evaluate the potential impact on customer service and
12 reliability. My testimony will supplement the direct testimony provided by CURB
13 witness Andrea C. Crane, who is providing testimony on CURB’s overall
14 recommendation.

15
16 **Q. Are reliability standards and customer service specifically addressed in the
17 Commission’s Order on Merger Standards?**

18 A. No. Reliability and customer service are not specifically identified in the Commission’s
19 Order on Merger Standards. However, it is my opinion that many of the Commission’s
20 merger standards are interrelated and while reliability and customer service are not
21 specifically addressed, any degradation to reliability and customer service could have a
22 negative impact on other merger standards. Said another way, if the Commission
23 approves the application and the Joint Applicants do not maintain reliability and customer

1 service at existing levels, the acquisition could present a risk to other identified merger
2 standards. As such, I am providing testimony in two areas: Reliability and the
3 responsiveness of the utilities in responding to the needs of its customers.
4

5 **Q. Does the Commission require utilities, including Westar and KCP&L, to report on**
6 **the reliability of their distribution systems?**

7 A. Yes. In KCC Docket No. 02-GIME-365-GIE (“365 Docket”), the Commission adopted
8 electric reliability requirements. As part of these requirements, utilities serving more than
9 15,000 customers are required to file an annual report containing reliability indices with
10 the Commission.
11

12 **Q. What are reliability indices?**

13 A. There are three reliability indices identified by the Commission in the 365 Docket:

- 14 1. System Average Interruption Frequency Index (“SAIFI”): SAIFI is the
15 average number of sustained interruptions per year. SAIFI is calculated as
16 the total number of interruptions divided by the total number of customers
17 served.
- 18 2. Customer Average Interruption Duration Index (“CAIDI”): CAIDI is the
19 average duration for each sustained customer service interruption during a
20 year. CAIDI is calculated as the sum of all customer interruptions
21 durations in minutes divided by the total number of customer
22 interruptions.
- 23 3. System Average Interruption Duration Index (“SAIDI”): SAIDI is the

1 average interruption duration from sustained interruptions, in minutes, per
 2 customer, during a year. SAIDI represents the average time a customer is
 3 without electric service during a year. SAIDI is calculated as the sum of
 4 all customer interruption durations in minutes divided by the total number
 5 of customers served.

6

7 **Q. What are KCP&L’s most recently filed reliability indices?**

8 A. The results of KCP&L’s 2015 Reliability Performance Report are listed below¹:

Table 1: Reliability Indices – 2011-2015						
Normalized Consistent with Docket No. 02-GIME-365-GIE Normalization Standards (Kansas Only)						
Reporting Year		2011	2012	2013	2014	2015
Total Customers (Calculated by Meter Counts)		247,788	246,759	251,401	254,226	255,676
Normalized*	SAIDI	237.30	72.80	109.3	113.06	138.69
	SAIFI	0.98	0.64	0.76	0.86	0.89
	CAIDI	242.40	113.70	143.70	131.87	156.29
Without Normalization	SAIDI	237.30	72.8	210.5	113.06	138.69
	SAIFI	0.98	0.64	0.92	0.86	0.89
	CAIDI	242.40	113.70	230.00	131.87	156.29

9

10

11 **Q. What are Westar’s most recently filed reliability indices?**

12 A. The results of Westar’s 2015 Annual Reliability Performance Reports are listed below²

¹ April 29, 2016, KCC Docket No. 02-GIME-365-GIE, *Kansas City Power & Light Company’s 2015 Reliability Performance Report*, at page 3.

² April 25, 2016, KCC Docket No. 02-GIME-365-GIE, *Annual Reliability Performance Reports for Westar Energy, Inc and Kansas Gas and Electric Company*, at pages 8 (Westar North) and 14 (Westar South).

Kansas Gas and Electric Company Westar Energy, South

Five-Year Assessment of SAIFI, SAIDI, & CAIDI by Subsidiary

Subsidiary	Year	SAIFI	SAIDI	CAIDI	Normalized Events
South	2011	1.609	141.3	87.8	1
	2012	1.225	164.0	133.8	2
	2013	1.448	186.5	128.8	1
	2014	1.287	116.7	90.7	0
	2015	1.408	146.2	103.8	1

1

Westar Energy, North

Five-Year Assessment of SAIFI, SAIDI, & CAIDI by Subsidiary

Subsidiary	Year	SAIFI	SAIDI	CAIDI	Normalized Events
North	2011	1.582	133.9	84.6	1
	2012	1.475	140.1	95.0	0
	2013	1.475	139.1	94.3	0
	2014	1.621	169.9	104.8	0
	2015	1.726	233.2	135.2	0

2

3 **Q. How do Westar and KCP&L compare in terms of reliability?**

4 A. According to Westar and KCP&L's annual reliability reports, the utilities are
5 complimentary in terms of reliability. Westar customers, both in the Westar North and
6 Westar South territory, experience a higher number of outages per year, with a longer
7 duration in minutes, than KCP&L customers. On the other hand, both Westar North and
8 Westar South have a quicker time required to restore service than KCP&L.

9

10

11

1 **Q. How many call centers does Westar operate?**

2 A. Westar operates one call center in Wichita, Kansas. This call center has 121 employees.³

3

4 **Q. How many call centers does KCP&L operate?**

5 A. KCP&L has one call center in Raytown, Missouri. This call center has 115 employees.⁴

6

7 **Q. How do the two call centers compare in terms of number of customer calls received**
8 **in their respective call centers?**

9 A. The Westar and KCP&L call centers appear to be performing similarly. According to
10 Westar's response to CURB Data Request No. 11 and KCP&L's response to CURB Data
11 Request No. 61, Westar reports fewer incoming calls than KCP&L. Westar reports fewer
12 calls being delivered to representative, or agent, and a lower abandoned call percentage
13 than KCP&L.⁵ Westar reports that in 2015, 77.7% of all incoming calls were answered
14 within 20 seconds⁶, while KCP&L reports 77% of all incoming calls in 2015 were
15 answered within 20 seconds.⁷

16

17 **Q. Is there evidence that suggests customer service and reliability will be impacted**
18 **negatively by the proposed application?**

19 A. No, there is no specific evidence that customer service and reliability will be negatively

³ Westar response to CURB DR 11.

⁴ KCPL response to CURB DR 61.

⁵ Westar and KCPL response to Staff DR 271.

⁶ Westar response to Staff DR 442.

⁷ KCPL response to Staff DR 271.

1 impacted by the merger. However, in my opinion it would be overly optimistic to
2 conclude that a transaction of this magnitude could not result in at least some impact on
3 customer service and reliability.

4
5 **Q. How could the proposed acquisition negatively impact customer service and**
6 **reliability?**

7 A. It is not my testimony that the proposed acquisition will necessarily cause a direct
8 decrease in customer service and reliability. However, as discussed in Andrea Crane's
9 direct testimony, if the acquisition is approved, GPE will be under considerable pressure
10 to contain costs in order to pay down the debt incurred as a result of this transaction. In
11 an effort to contain costs, it's reasonable to assume that GPE potentially could reduce
12 operating costs including costs associated with customer service to such a degree that
13 reliability and customer service are negatively impacted. Therefore, if the Commission
14 were to approve the proposed application, I recommend the Commission approve quality
15 of service standards and penalty provisions, similar to what was presented in the
16 Unanimous Settlement Agreement in the recent Empire District Electric Company
17 acquisition docket, KCC Docket No. 16-EPDE-410-ACQ ("410 Docket").

18
19 **Q. Please describe the penalty provisions described in the Unanimous Settlement**
20 **Agreement in the 410 Docket.**

21 A. As part of the Unanimous Settlement Agreement, parties agreed to use a normalized
22 baseline reliability statistics for the years 2013 through 2015 (unlike Westar and KCPL,
23 because it has less than 15,000 customers, Empire District Electric was not required to

1 make a filing of its annual reliability performance as ordered in the 365 Docket). Parties
2 agreed that Empire District Electric would begin filing its annual reliability performance
3 reports, and if the reliability parameters fall to between 5% and 10% of the normalized
4 baseline, then a penalty would apply.

5
6 **Q. What was the penalty amount proposed in the Unanimous Settlement Agreement in
7 the 410 Docket?**

8 A. The potential penalty ranges from \$35,000 for a reliability parameter deviation of 5%-
9 10%, \$70,000 for a deviation of 10%-15%, and \$105,000 for a deviation greater than
10 15%. These penalty amounts were based on Staff's recommendation in the ONEGas
11 Reorganization Docket. The penalty amounts included in the Unanimous Settlement
12 Agreement in the 410 Docket were reduced from the levels in the ONEGas
13 Reorganization Docket to reflect the small size of Empire's operations in Kansas.

14
15 **Q. Has the Commission issued its final order in the 410 Docket?**

16 A. No. The Commission's Order in the 410 Docket is due on January 10, 2017.

17
18 **Q. If the Commission were to approve the Application, what do you recommend the
19 Commission determine to be the appropriate baseline for reliability parameters?**

20 A. I recommend the Commission review the reliability parameters identified by Westar and
21 KCP&L for years 2012-2015, as well as the call center statistics. Based on the reported
22 performance results, I would recommend the Commission establish the highest
23 performing reliability statistics as the baseline for the new company. Establishing the

1 baseline based upon a three-year average of the best performance indices will ensure that
2 the new company will provide, at minimum, the same level of service to its customers,
3 while improving reliability and customer service for others.
4

5 **Q. Are you recommending a specific level of penalty be approved by the Commission?**

6 A. No. I am recommending the Commission approve similar quality of service standards and
7 penalty provisions as recommended by the parties in the 410 Docket. However, the
8 determination of the amount of penalty for failing to meet Commission established
9 baseline quality of service standards should be a process that parties collaborate upon and
10 report to the Commission, at its direction.
11

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

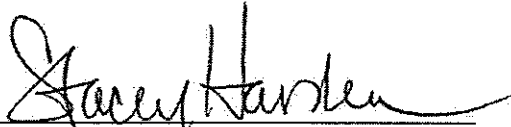
13 A. Yes, it does.

VERIFICATION

STATE OF KANSAS)

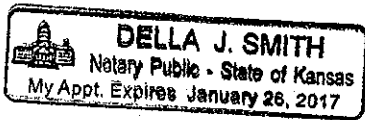
COUNTY OF SHAWNEE) ss:

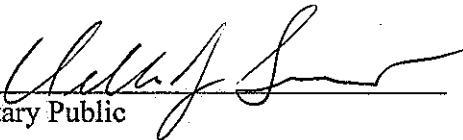
I, Stacey Harden, of lawful age and being first duly sworn upon my oath, state that I am a consultant for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.



Stacey Harden

SUBSCRIBED AND SWORN to before me this 16th day of December, 2016.





Notary Public

My Commission expires: 01-26-2017.

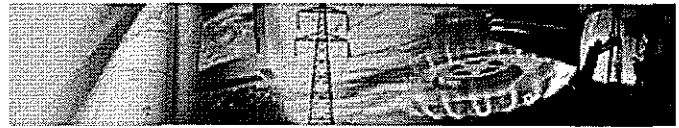
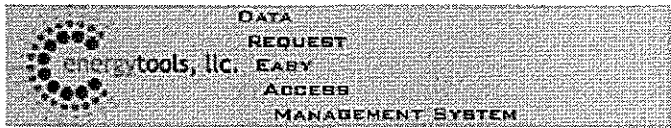
Referenced Data Requests

CURB-11 (Westar)

CURB-61 (KCP&L)

KCC Staff-271 (KCP&L and Westar)

KCC Staff-442 (Westar)



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Thursday, August 18, 2016
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Docket: [16-KCPE-593-ACQ] Merger - Great Plains
Requestor: [CURB] [David Nickel]
Data Request: CURB-11 :: Customer Service Call Centers
Date: 0000-00-00

Question 1 (Prepared by Ginger Elsea)

Please identify all customer service call centers currently serving Westar. For each call center, please provide the current location and number of employees located at that location.

Response:

We have one call center located at, 100 N Broadway St. Suite 800, Wichita Ks 67201. There are 121 employees in the call center.

No Digital Attachments Found.

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KCPL KS
Case Name: 2016 Westar Aquisition
Case Number: 16-KCPE-593-ACQ

Response to Nickel David Interrogatories - CURB_20160803
Date of Response: 8/15/2016

Question:CURB-61

Please identify all customer service call centers currently serving KCP&L. For each call center, please provide the current location and number of employees located at that location.

Response:

KCP&L customers are served through one contact center.
Contact Center Location: 10700 East State Route 350, Raytown, MO 64138
Contact Center Employees: 115

Response provided by: Erica Penner

Attachment: QCURB-61_Verification

Verification of Response

Kansas City Power & Light Company

Docket No. 16-KCPE-593-ACQ

The response to KCPL KS Data Request# CURB-61 submitted by KCP&L, is covered by this Verification of Response:

I have read the foregoing Information Request(s) and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signed: _____

Jan Jurek

Title: _____

Director

Date: _____

8/11/16



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Thursday, October 27, 2016

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Docket: [16-KCPE-593-ACQ] Merger - Great Plains
Requestor: [KCC] [Casey Gile]
Data Request: KCC-271 :: Call Center Data and Performance
Date: 0000-00-00

Question 1 (Prepared by Ginger Elsea)
 Please report on tracked performance from each call center operated, for the past three years. At a minimum this data should include: Calls received Calls dropped Calls abandoned

Response:
 2013 2014 2015 Total Incoming Calls 3,129,658 3,253,806 3,038,734 Calls Offered to IVR 2,726,741 2,927,795
 2,718,288 Calls Answered by CSR 1,138,436 1,050,990 1,104,574 Calls Dropped -- -- -- Calls Abandoned 44,769
 121,263 28,422

No Digital Attachments Found.

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KCPL KS
Case Name: 2016 Westar Acquisition
Case Number: 16-KCPE-593-ACQ

Response to Gile Casey Interrogatories - KCC_20161021
Date of Response: 11/04/2016

Question:271

Please report on tracked performance from each call center operated, for the past three years.

At a minimum this data should include:

- Calls recieved
- Calls dropped
- Calls abandoned

Number of Attachments:

Response:

Year	Gross Calls	Agent Calls	Service Level	Abandons	Blocked Calls	ASA (seconds)
2013	3,670,809	1,746,733	69%	4.1%	0.7%	45
2014	3,587,282	1,690,340	72%	3.5%	0.6%	37
2015	3,590,234	1,608,888	77%	3.3%	1.1%	31

Data above encompasses all of KCP&L (Missouri and Kansas) as well as KCP&L Greater Missouri Operations Company.

Definition of Metrics:

Gross calls: Total number of calls to KCP&L Customer Service

Agent calls: Number of calls requested to speak to an Agent

Service Level: Percentage of calls answered in 20 seconds

Abandons: Percentage of calls abandoned while waiting for an agent

Blocked calls: Percentage of calls which received a busy signal

ASA: The average amount of time it takes for calls to be answered by an agent.

Attachment: Q271_Verification.pdf

Verification of Response

Kansas City Power & Light Company

Docket No. 16-KCPE-593-ACQ

The response to KCC Data Request# 271, submitted by KCP&L, is covered by this Verification of Response:

I have read the foregoing Information Request(s) and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signed: _____

Title: _____

Date: _____

[Handwritten Signature]

Director

10/24/16



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Thursday, December 15, 2016
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Docket: [16-KCPE-593-ACQ] Merger - Great Plains
Requestor: [KCC] [Casey Gile]
Data Request: KCC-442 :: Call Center service level
Date: 0000-00-00

Question 1 (Prepared by Isaac Perez)
Please provide the percentage of incoming calls that were answered within the first 20 secs for 2015. You may find it described as "service level"
Response:
77.7% of incoming calls were answered within 20 seconds in 2015.
No Digital Attachments Found.

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CERTIFICATE OF SERVICE

16-KCPE-593-ACQ

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 16th day of December, 2016, to the following parties:

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