

**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 & Light Company and Westar ) Docket No. 16-KCPE-593-ACQ  
Energy, Inc. for Approval of the Acquisition )  
of Westar Energy, Inc. by Great Plains )  
Energy Incorporated. )

**COMMISSION STAFF'S RESPONSE TO JOINT APPLICANTS' MOTION FOR  
ORDER DEFINING APPROPRIATE CROSS EXAMINATION**

COMES NOW the Staff of the State Corporation Commission of the State of Kansas (Staff and the Commission, respectively), and respectfully submits its *Response to Joint Applicants' Motion for Order Defining Appropriate Cross Examination*. In support of its Response, Staff states as follows:

**I. Background**

1. On June 28, 2016, Great Plains Energy Incorporated (GPE), Kansas City Power & Light Company (KCP&L), and Westar Energy, Inc., and Kansas Gas and Electric Company (Westar), (collectively referred to as Joint Applicants) filed a Joint Application seeking approval for GPE to acquire 100% of the stock of Westar in a transaction valued at approximately \$12.2 billion, including assumed debt.<sup>1</sup>

2. On September 27, 2016, the Commission issued its Order Setting Procedural Schedule. In its Order, the Commission set deadlines for the parties to file direct, cross-answering, and rebuttal testimony. The Commission also scheduled a hearing for January 30 through February 10, 2017.<sup>2</sup>

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<sup>1</sup> Joint Application, June 28, 2016, ¶ 6.

<sup>2</sup> Order Setting Procedural Schedule, September 27, 2016, ¶ 4.

3. On December 16 and 22, 2016, twenty six (26) witnesses filed direct and/or cross-answering testimony on behalf of Staff and parties granted intervention in this proceeding. On January 9, 2017, fourteen (14) witnesses filed rebuttal testimony on behalf of the Joint Applicants.

4. On January 11, 2017, Staff, the Citizens' Utility Ratepayer Board (CURB), the Kansas City Board of Public Utilities (BPU), and the Kansas Electric Power Cooperative, Inc. (KEPCo)(collectively, Joint Movants), filed a Joint Motion to Strike and for Sanctions against Joint Applicants. In this Motion, the Joint Movants made clear that certain portions of the Joint Applicants' rebuttal testimony should be struck from the record or given no weight by the Commission.<sup>3</sup> In support, the Joint Movants noted that these sections of testimony would "prejudicially update and amend the Joint Application by supplying new facts and methodologies – withheld from the parties during discovery – that go well beyond an analytical rebuttal of the direct testimony opposing the Joint Application in an apparent attempt to cure deficiencies with the Joint Application."<sup>4</sup> In other words, the new positions included in rebuttal testimony constitute an inappropriate amendment of the Joint Application. In effect, they create a "moving target" for the other parties' review of the transaction. Joint Movants noted that this maneuver is objectionable "since Staff and the intervenors have no remaining opportunity to investigate or analyze the data."<sup>5</sup>

5. Also on January 11, 2017, the Joint Applicants filed their Motion for Order Defining Appropriate Cross Examination. In their Motion, the Joint Applicants argue that the Commission should limit parties' use of cross-examination. In particular, the Joint Applicants

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<sup>3</sup> Joint Motion to Strike and for Sanctions against Joint Applicants, January 11, 2017, ¶¶ 24, 33. (Joint Motion to Strike, ¶¶ 24, 33.)

<sup>4</sup> Joint Motion to Strike, ¶ 21.

<sup>5</sup> Joint Motion to Strike, ¶ 22.

are concerned that generally aligned parties (nearly every party other than the Joint Applicants) may engage in so-called “friendly cross examination” of each other’s witnesses to supplement their prefiled direct positions.<sup>6</sup> Therefore, the Joint Applicants “request the Commission issue an order prohibiting the parties from engaging in cross examination at hearing which would constitute the solicitation of supplemental direct or surrebuttal testimony from witnesses not adverse to the cross-examining party on the issue in question.”<sup>7</sup>

## **II. Response to Motion for Order Defining Appropriate Cross Examination**

6. Staff generally agrees with the Joint Applicants’ citations to legal authority and Commission practice. Staff further agrees that, while there is no rigid rule prohibiting “friendly cross examination,” the practice should be generally prohibited by the Commission. However, the Commission has wide latitude to accept relevant evidence, and the rule can be relaxed when additional testimony is helpful to the Commission.

7. The Joint Applicants’ Motion – seeking to proactively hold parties to their current positions – is somewhat curious given the supplementary nature of the Joint Applicants’ rebuttal testimony, which would *necessitate* additional review by Staff and the intervenors. As noted above, Staff objected to the Joint Applicants’ attempts to amend and supplement the Joint Application through inappropriate rebuttal testimony. If that information is admitted and given weight, Staff will need additional time to investigate and present surrebuttal testimony. However, assuming the new information is struck or given no weight, there will be no need for the parties to supplement or amend their prefiled direct positions. Therefore, a symmetrical approach demands both motions be granted.

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<sup>6</sup> Joint Applicants Motion for Order Defining Appropriate Cross Examination, January 11, 2017, ¶¶ 1-2.

<sup>7</sup> Joint Motion for Order Defining Appropriate Cross Examination, p. 3.

8. For the reasons stated above, Staff does not object to an order generally prohibiting cross examination on discrete issues when the witness and questioning party are aligned on such issues. With the exception of the Joint Applicants, nearly every active party agrees that this transaction does not promote the public interest. However, despite this general alignment with regard to the ultimate issue, there are genuine disagreements between those parties on discrete issues. Therefore, the Commission should clearly state that cross examination will be allowed on specific issues where the parties' direct positions are not aligned.

WHEREFORE, Staff respectfully requests the Commission accept its *Response to Joint Applicants' Motion for Order Defining Appropriate Cross Examination* and issue an order consistent with the position stated above.

Respectfully submitted,

/s/ Andrew J. French

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**16-KCPE-593-ACQ**

Andrew J. French, of lawful age, being duly sworn upon his oath deposes and states that he is Senior Litigation Counsel for the State Corporation Commission of the State of Kansas; that he has read and is familiar with the foregoing *Commission Staff's Response to Joint Applicant's Motion for Order Defining Appropriate Cross Examination*, and attests that the statements therein are true and correct to the best of his knowledge, information and belief.

SUBSCRIBED AND SWORN to before me this 23<sup>rd</sup> day of January, 2017.



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## **CERTIFICATE OF SERVICE**

16-KCPE-593-ACQ

I, the undersigned, certify that a true and correct copy of the above and foregoing Commission Staff's Reply to Joint Applicant's Motion for Order Defining Appropriate Cross Examination was served via electronic service this 23rd day of January, 2017, to the following:

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