

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

In the Matter of the Notice and Application of)
Westar Energy, Inc. and Kansas Gas and) Docket No. 15-WSEE-188-MIS
Electric Company for a Limited Waiver of the)
Billing Standards)

**WESTAR ENERGY, INC. AND KANSAS GAS AND ELECTRIC COMPANY'S
RESPONSE TO STAFF'S REPORT AND RECOMMENDATION**

COMES NOW Westar Energy, Inc. and Kansas Gas and Electric Company (collectively "Westar") and submits the following Response to Staff's Report and Recommendation:

1. On October 30, 2014, Westar filed an Application and Direct Testimony with the Commission asking for a limited waiver of the Billing Standards. Westar requested a waiver of the portions of the Billing Standards that require a Westar employee to offer a customer an opportunity to make payment at the door before disconnecting that customer's service (the "knock and collect" requirements).

2. Previous to its filing in this docket, Westar made a similar request in Docket No. 13-WSEE-707-TAR. In that docket, Staff recommended that the Commission deny the application because the waiver Westar requested only applied to customers with AMI meters and did not apply equally to all customers. The Commission agreed with Staff's position and denied Westar's Application.

3. In its Application in this docket, Westar addressed all of Staff and the Commission's concerns from the previous docket by making its request applicable to all customers and adding an additional opportunity for customers to pay their bills. This new opportunity would replace the waived requirement to knock and allow for the economic efficiency provided by the installation of AMI meters.

4. On December 30, 2014, Staff filed its Report and Recommendation. Staff recommended that the Commission dismiss Westar's Application and open a general investigation docket to evaluate the appropriateness of Section IV, Item C(2), Section IV, Item G, and Section V, Item D(2) of the Billing Standards – the knock and collect requirements.

5. Westar strongly believes that its Application and Direct Testimony in this docket address all the stated concerns of the Commission and Staff from the previous docket where the Commission denied Westar's request for a waiver. However, Westar is not opposed to Staff's recommendation that the Commission address the issues in a general investigation docket as long as the Commission sets a specific timeline for the general investigation docket. Westar, like Staff, wants such a docket to remain focused and be resolved quickly. This will be best achieved if the Commission establishes a stated timeline at the start of the docket.

6. Westar recommends that the Commission establish a 180-day timeline for this focused process, but in any event, the process should not be allowed to exceed the 240-day timeline that would have applied to Westar's Application in this docket under K.S.A. 66-117(c).

Respectfully submitted,
WESTAR ENERGY, INC.
KANSAS GAS AND ELECTRIC COMPANY



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VERIFICATION

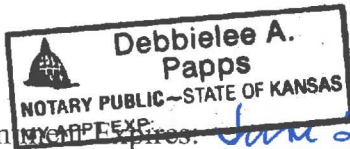
STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

Cathryn J. Dinges, being duly sworn upon her oath deposes and says that she is one of the attorneys for Westar Energy, Inc. and Kansas Gas and Electric Company; that she is familiar with the foregoing **Response**; and that the statements therein are true and correct to the best of her knowledge and belief.

Cathryn Dinges
Cathryn J. Dinges

SUBSCRIBED AND SWORN to before me this 7th day of January, 2015.

Debbielee A. Papps
Notary Public



My Appointment Expires: June 26, 2017

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of January, 2015, the foregoing Response was electrically filed with the Kansas Corporation Commission and an electronic copy was delivered to each party on the service list.

Cathryn Dinges
Cathryn J. Dinges