

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

**DIRECT TESTIMONY
OF
JEANETTE BOUZIANIS
WESTAR ENERGY**

DOCKET NO. 18-WSEE³²⁸-RTS

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. Jeanette Bouzianis, 818 South Kansas Avenue, Topeka, Kansas
66612.

Q. BY WHOM AND IN WHAT CAPACITY ARE YOU EMPLOYED?

A. Westar Energy, Inc. (Westar) as Director, Financial Accounting.

**Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND
EMPLOYMENT EXPERIENCE.**

A. I received a Bachelor of Science degree with a major in Accounting
from St. Joseph's College in Patchogue, New York. I worked two
years in the public accounting industry before joining Westar in 1992.
While at Westar, I have held various positions within the Corporate
Tax Department including Director, Income Tax until 2013, at which

1 time I joined the Financial Accounting department in my current
2 position. I am a Certified Public Accountant and am a member of the
3 American Institute of Certified Public Accountants and the Kansas
4 Society of Certified Public Accountants.

5 **Q. WHAT ARE YOUR PRESENT RESPONSIBILITIES WITH**
6 **WESTAR?**

7 A. I have managerial responsibility for Westar's financial accounting
8 and reporting functions.

9 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS**
10 **COMMISSION?**

11 A. Yes. I have submitted testimony to the Commission in previous rate
12 cases.

13 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

14 A. The purpose of my testimony is to sponsor the following adjustments
15 in Westar's Minimum Filing Requirements (MFRs):

- 16 1. The Aquila consent fee (RB-2),
- 17 2. An adjustment related to Westar's Wholesale Contracts (IS-43)
- 18 3. An adjustment related to generation O&M (IS-21),
- 19 4. An adjustment for a Wolf Creek Settlement (IS-12),
- 20 5. Working capital
- 21 6. An adjustment to annualize Western Plains Wind Farm O&M (IS-
- 22 40),

- 1 7. An adjustment to remove wind generation PILOT and Royalty
2 payments (IS-44),
3 8. An adjustment for the increase in Environmental assessments
4 (IS-45),
5 9. An adjustment for La Cygne Dismantlement cost estimate
6 reduction (IS-41).

7 **II. AQUILA CONSENT FEE**

8 **Q. PLEASE EXPLAIN ADJUSTMENT NO. RB-2 “AQUILA CONSENT**
9 **FEE.”**

10 A. This adjustment recognizes, as cost-free capital, the unamortized
11 portion of the consent fee that Westar received from Aquila related
12 to the purchase of Aquila’s 8% interest in Jeffrey Energy Center
13 (JEC). The adjustment decreases rate base by \$2,280,304. The
14 amortization of the regulatory liability has been booked to account
15 451 – Other Revenues – during the test year and is included in the
16 cost of service. Therefore, no income statement adjustment is
17 required.

18 **III. CHANGE IN WHOLESALE CUSTOMERS**

19 **Q. PLEASE EXPLAIN ADJUSTMENT NO. IS-43 “WHOLESALE**
20 **CONTRACT REVENUE DECREASE.”**

21 A. As Mr. Bridson explains in his direct testimony, our service to
22 Midwest Energy, Inc. (Midwest) under two wholesale agreements
23 ended on May 31, 2017. Effective June 1, 2017, Midwest began

1 taking service under a capacity contract which extends through May
2 31, 2022. In general, the revenue Westar receives from wholesale
3 customers taking service under these various agreements is credited
4 to retail customers in base rates and is adjusted for changes in a rate
5 review. The revenue received from Midwest during the test year
6 under its expired agreements is significantly greater than the
7 annualized revenue under the new capacity contract. This
8 adjustment reflects the known and measurable impact of this
9 reduction in revenue in the cost of service. This adjustment
10 decreases test year revenues by \$9,452,141.

11 **IV. GENERATION O&M**

12 **Q. PLEASE EXPLAIN ADJUSTMENT NO. IS-21 "GENERATION**
13 **O&M."**

14 A. This adjustment corrects fuel-handling charges that were recorded
15 to an incorrect account during the test year. As fuel handling
16 charges, the following amounts should have been recorded to
17 account 501 and recovered through the Retail Energy Cost
18 Adjustment (RECA):

- 19 1. \$64,022.40 spent on calcium bromide for mercury control,
20 originally recorded to account 502.
- 21 2. \$360,141.65 spent on chemicals used to remove coal
22 combustion residuals (CCRs) from scrubber wastewater,
23 originally charged to account 502.

- 1 3. \$329,473.88 spent from coal yard to first plant hopper
- 2 removing coal and coal dust from fuel handling equipment
- 3 such as conveyors and transfers, originally charged to
- 4 account 506.
- 5 4. \$93,840.85 spent re-railing coal cars, originally charged to
- 6 account 511 and 512.
- 7 5. \$178,708.75 spent cleaning and/or disposing of fly ash,
- 8 originally charged to account 512.
- 9 6. \$19,441.06 spent cleaning and/or disposing of bottom ash,
- 10 originally charged to account 512.

11 The net of these amounts is a decrease in test year Operation and
12 Maintenance expense of \$1,045,628.59.

13 **V. WOLF CREEK SETTLEMENT**

14 **Q. PLEASE EXPLAIN ADJUSTMENT NO. IS-12 “WOLF CREEK**
15 **SETTLEMENT.”**

16 A. This adjustment reverses the effect of a one-time settlement of a civil
17 action for which settlement proceeds were received in June 2017
18 related to a dispute between the owners of the Plant and a vendor
19 that provided various equipment repair and refurbishment services
20 at the Wolf Creek Nuclear Generating Station (the Plant) in the
21 course of a scheduled outage in 2011. KGE’s share of the settlement
22 was ****Confidential** [REDACTED] **. Of this amount,
23 ****Confidential** [REDACTED] ** was primarily related to direct

1 damages from lost energy production at the Plant. We recorded this
2 as a reduction to fuel expense during the test year, which flows
3 through the RECA. The remaining ****Confidential [REDACTED]****
4 was for other direct damages incurred at the Plant including inside
5 labor, consultants' costs, and NRC compliance costs. We recorded
6 this amount as a reduction to Operation and Maintenance expense
7 during the test year. This portion of the settlement proceeds
8 decreased our Operations and Maintenance costs during the test
9 year, although it is related to an incident that occurred in 2012. As a
10 result, this adjustment increases test year Operation and
11 Maintenance expense by ****Confidential [REDACTED]****.

12 **VI. WORKING CAPITAL – SECTION 6**

13 **Q. PLEASE DESCRIBE THE PORTION OF SECTION 6 RELATED TO**
14 **FOSSIL FUEL, AND OTHER INVENTORY BALANCES.**

15 A. Material and Supplies inventory, Prepayments and Fossil Fuel
16 inventory for coal, oil and natural gas are calculated using the month
17 end book balances for each month from June 30, 2016 through June
18 30, 2017 then averaging these amounts to derive a 13-month
19 average. Nuclear Fuel follows a similar approach with the exception
20 of the use of an 18-month average to reflect a normal refueling cycle.

VII. ANNUALIZE WESTERN PLAINS WIND FARM O&M

Q. PLEASE EXPLAIN ADJUSTMENT NO. IS-40 “ANNUALIZE WESTERN PLAINS WIND FARM O&M.”

A. This adjustment reverses Operation and Maintenance (O&M) expense in the test year that was incurred prior to the start of commercial operation of Western Plains Wind Farm and replaces it with a normalized twelve months of O&M expense. Commercial operations began in March 2017, therefore, the normalized twelve months of O&M expense includes actual expense for March through September 2017 and O&M budgeted amounts for October 2017 through February 2018. As a result, this adjustment increases test year O&M expense by \$4,564,846.

VIII. REMOVE WIND GENERATION PILOT AND ROYALTY PAYMENTS

Q. PLEASE EXPLAIN ADJUSTMENT NO. IS-44 “REMOVE WIND GENERATION PILOT AND ROYALTY PAYMENTS.”

A. As Mr. Wilkus discusses in his direct testimony, Westar is proposing to remove wind generation Payments in Lieu of Taxes (PILOT) and royalty payments from test year Operating expense and request approval to recover them in the Property Tax Surcharge (PTS) rider and RECA clause, respectively. This adjustment removes these amounts from base rates so they can be recovered through the PTS and RECA. Total PILOT payments during the test year were \$1,009,158. Total royalty payments during the test year were

1 \$1,801,976. The net adjustment to reverse PILOT and royalty
2 payments from the cost of service results in a decrease to test year
3 Operating expense of \$2,811,134, subject to Commission approval
4 to add these costs to the Property Tax Surcharge rider and RECA
5 clause.

6 **IX. INCREASE IN ENVIRONMENTAL ASSESSMENTS**

7 **Q. PLEASE EXPLAIN ADJUSTMENT NO. IS-45 “INCREASE IN**
8 **ENVIRONMENTAL ASSESSMENTS.”**

9 A. This adjustment increases test year Operating expense for the
10 increase in emission fees from \$37 per ton to \$53 per ton of
11 emissions per Kansas Department of Health and Environment
12 (KDHE) regulations and documented in section 28-19-517(b)(1)(B)
13 of the Kansas Register, dated December 21, 2017. This increase is
14 applicable to 2017 calendar year emissions which are reportable to
15 KDHE by April 1, 2018. We estimate a company-wide emission fee,
16 excluding La Cygne, of \$602,716 for the calendar year 2017 at the
17 new fee of \$53 per ton. This compares to actual test year emissions
18 fees of \$383,505 at \$37 per ton of emissions. As a result, this
19 adjustment increases the cost of service Operating expense by
20 \$219,211.

1 **X. LA CYGNE DISMANTLEMENT COST ESTIMATE REDUCTION**

2 **Q. PLEASE EXPLAIN ADJUSTMENT NO. IS-41 “LA CYGNE**
3 **DISMANTLEMENT COST ESTIMATE REDUCTION.”**

4 A. This adjustment reduces test year Operating expense due to a
5 decrease in the dismantling estimate for La Cygne unit 2. Westar
6 has a leasehold interest in 50% of La Cygne unit 2 and Kansas City
7 Power & Light Company owns the other 50%. The most recent
8 dismantling cost study reflects a total dismantling cost of
9 \$26,160,000 after adjusting for inflation compared to the previous
10 estimate of \$58,500,000. As of the end of the test year, Westar’s
11 cumulative accrued liability, based on the previous dismantling cost
12 study, exceeds the new estimate of \$26,160,000. As a result, this
13 adjustment reverses the dismantling expense accrued during the test
14 year, thereby decreasing test year Operating expense by
15 \$2,412,371.

16 **Q. THANK YOU.**