Cathryn J. Dinges Senior Corporate Counsel



March 16, 2018

Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, Kansas 66604

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

To Whom it May Concern:

Applicants filed their rebuttal testimony in the above-referenced docket on February 19, 2018.

Applicants have discovered a typographical mistake in on page 9 of the Rebuttal Testimony of Bruce Akin. Westar is filing a redlined and a clean version of page 9 of Mr. Akin's Rebuttal Testimony that include the necessary correction, attached to this letter.

Please accept my apologies for any inconvenience caused by this error.

Sincerely,

Cathryn J. Dinges

Cathryn Dinges

cc: All parties

## TABLE 1 – SAIDI, SAIFI AND CAIDI FOR WESTAR, $^{17}$

Criteria	Company	2012	2013	2014	2015	2016	5 Year Average
SAIDI	Westar South	107.0	118.5	116.9	104.4	144.6	118.3
	Westar North	108.4	102.8	111.3	125.7	121.0	113.8
	Westar Combined	111.3	118.4	118.3	124.2	133.7	121.2
SAIFI	Westar South	1.11	1.20	1.29	1.26	1.27	1.23
	Westar North	1.33	1.28	1.36	1.36	1.30	1.33
	Westar Combined	1.24	1.27	1.34	1.37	1.28	1.30
CAIDI	Westar South	96.7	99.0	90.7	83.1	113.5	96.6
	Westar North	81.2	80.0	81.9	92.1	93.3	85.7
	Westar Combined	90.0	93.5	88.2	90.4	104.1	93.2

## Q. HOW DO YOU RESPOND TO STAFF'S PROPOSAL REQUIRING IMPROVED

PERORMANCE IN RELIABILITY METRICS, I.E., THE PERFORMANCE

## IMPROVEMENT PLAN?

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- A. As I discuss in detail below, this proposal should be rejected because it:
  - is inconsistent with historic Commission precedent and is not required by the Commission's merger standard;
  - is not supported by reference to mergers in other jurisdictions; and

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<sup>&</sup>lt;sup>17</sup> Source: Responses of Westar to Staff data requests 113, 114 and 116.

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