

BEFORE THE STATE CORPORATION COMMISSION

OF THE STATE OF KANSAS



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State Corporation Commission
of Kansas

**In the Matter of the Application of)
Mid-Kansas Electric Company, LLC)
for Approval to Make Certain Changes)
in its Charges for Electric Service in the)
Geographic Service Territory Served by)
Southern Pioneer Electric Company)**

Docket No. 12-MKEE-380-RTS

DIRECT TESTIMONY AND EXHIBITS

OF

MARK F. DOLJAC

KANSAS ELECTRIC POWER COOPERATIVE, INC.

April 20, 2012

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS
DIRECT TESTIMONY AND EXHIBITS OF**

**MARK F. DOLJAC
DIRECTOR OF RATES AND REGULATION**

KANSAS ELECTRIC POWER COOPERATIVE, INC.

Docket No. 12-MKEE-380-RTS

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Mark F. Doljac. My business address is 600 Southwest
3 Corporate View, Topeka, Kansas 66615.

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

5 A. I am Director of Rates and Regulation for the Kansas Electric Power
6 Cooperative, Inc. (KEPCo).

7 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND.**

8 A. I received the degrees of Bachelor of Science in Electrical Engineering
9 from Kansas State University in 1986, and Master of Business Administration
10 from Baylor University in 1989.

11 **Q. WHAT ARE YOUR RESPONSIBILITIES WITH KEPCo?**

12 A. Basically, I am responsible for developing, implementing and maintaining
13 KEPCo's rate structure with its Members, preparing rate studies and short-term
14 and long-term financial forecasts, and monitoring regulatory matters as they
15 relate to the provision of service to the Members of KEPCo.

16 **Q. PLEASE BRIEFLY DESCRIBE YOUR PROFESSIONAL EXPERIENCE.**

17 A. I was employed during the summer of 1988 by the Bonneville Power
18 Administration in Portland, Oregon, where I worked as Electrical Engineer in the

1 area of extra-high voltage (EHV) transmission. In 1989, I began working as
2 Assistant Engineer for Ebasco Services, Incorporated, a consulting firm that was
3 involved in electric generation and transmission engineering and design, in
4 Houston, Texas. I accepted a transfer to Ebasco's regional headquarters in
5 Atlanta, Georgia in 1990, where I worked as Associate Engineer, and then Senior
6 Associate Engineer until December 1992.¹ In January 1993, I began working for
7 the Kansas Corporation Commission (Commission) as Senior Utility Engineer /
8 Rate Analyst. In this role, I was responsible for reviewing and analyzing electric
9 utility operations, plant performance, and investment in and construction of
10 facilities for efficiency, reasonableness, safety and reliability and the review and
11 analysis of utility rate structures, including recommending alternate rates, when
12 needed, to ensure that rates were just, reasonable, and promoted the goals and
13 policies of the Commission. In December 2008, I was promoted to Chief of
14 Energy Rates, a role in which I was responsible for supervising a staff of four to
15 review and analyze electric and gas utility rates, to ensure rates were just and
16 reasonable and promoted the goals and policies of the Commission. In May
17 2009, I accepted employment with KEPCo in my present position.

18 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE KANSAS**
19 **CORPORATION COMMISSION?**

20 **A.** Yes, I have testified before this Commission numerous times. During my
21 16 years of employment at the Commission, I testified and provided

¹ Ebasco Services, Inc. was purchased by Raytheon Engineers & Constructors in 1993.

1 recommendations to the Commission on various matters, including fully-allocated
2 utility cost of service, unbundling electric transmission rates, including
3 transmission delivery charge (TDC) implementation under K.S.A. 66-1237, and
4 other electric rate matters, generation and transmission line siting, and utility
5 performance and quality of service. While employed by KEPCo, I filed testimony
6 in Docket No. 11-MKEE-439-RTS (439 Docket) concerning the Local Access
7 Delivery Service tariff proposed by Mid-Kansas Electric Company, LLC (Mid-
8 Kansas) for its Wheatland Electric Division.

9 **Q. PLEASE DESCRIBE KEPCo.**

10 A. KEPCo is a generation and transmission (G&T) cooperative that serves 19
11 member-owner distribution cooperatives, which in turn serve across
12 approximately two-thirds of eastern and central Kansas. KEPCo has member
13 load embedded within and served from the transmission facilities of multiple
14 transmission owners, one being Mid-Kansas Electric Company, LLC (Mid-
15 Kansas). As part of its transmission needs within the Mid-Kansas system,
16 KEPCo, as a result of the spin-down of certain Mid-Kansas low-voltage (*i.e.*, <60
17 kV) transmission facilities to the various Mid-Kansas member-owners, is served
18 by certain assets ultimately owned by these member-owners, including Southern
19 Pioneer Electric Company (Southern Pioneer). Given these service
20 relationships, KEPCo has a substantial interest in Mid-Kansas' proposed
21 application, including the proposed Local Access Charge (LAC) by Southern
22 Pioneer, which is included in its Local Access Delivery Service rate schedule, to

1 be applicable to KEPCo's use of Southern Pioneer's low-voltage transmission
2 facilities.

3 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY REGARDING MID-**
4 **KANSAS' APPLICATION IN THIS PROCEEDING?**

5 A. KEPCo's review of Mid-Kansas' Application focused on the cost-of-service
6 support and associated rate design as it affects the proposed LAC, which applies
7 to KEPCo. KEPCo takes Local Access Delivery Service from Mid-Kansas to
8 deliver power to nine delivery points serving the load of two KEPCo member
9 systems. In 2011, Mid-Kansas assessed KEPCo roughly \$320,000 in charges
10 under the Southern Pioneer LAC rate. The large increase in LAC rate proposed
11 by Applicant would have a significant impact on the delivered power cost borne
12 by KEPCo – a cost which would then be required to be recovered from its
13 members and ultimately its members' retail customers.

14 I will first provide a brief introduction to the testimony provided by Mr.
15 Stephen Daniel on behalf of KEPCo. I will then present testimony and exhibits
16 regarding issues that KEPCo has with Applicant's proposed definition of Monthly
17 Billing Demand, as well as the Loss Factors proposed in the Local Access
18 Delivery Service rate schedule for Southern Pioneer, all applicable to KEPCo.

19 KEPCo's primary focus in reviewing the Application was the Mid-Kansas'
20 proposed Local Access Delivery Service tariff for the Southern Pioneer Division,
21 and the components used to calculate the associated LAC. KEPCo did not
22 closely scrutinize all cost components of Mid-Kansas' proposed revenue
23 requirement. As a result, the impacts of KEPCo's analysis do not reflect a

1 comprehensive review of all components of the proposed revenue requirement
2 for the Local Access Delivery System. To the extent that the Commission finds
3 that it is warranted to adjust this revenue requirement on the merits of the entire
4 record, KEPCo clarifies that the LAC should reflect those adjustments and the
5 billing demand calculated in the analysis presented in my testimony.

6 **Q. ARE YOU SPONSORING ANY EXHIBITS?**

7 A. Yes. I am sponsoring Exhibit MD1. Exhibit MD1 contains copies of
8 various unrestricted discovery documents upon which I rely for my testimony.

9 **Q. WHAT IS THE SUBJECT OF MR. DANIEL'S TESTIMONY ON BEHALF**
10 **OF KEPCO?**

11 A. Mr. Stephen Daniel provides testimony on behalf of KEPCo that
12 addresses the balancing of respective interests of Applicant and its customers,
13 and the reasonableness of Southern Pioneer's proposed Debt Service Coverage
14 (DSC) Ratemaking Plan. Concerning the former topic, Mr. Daniel addresses the
15 need for balancing the utility and customer interests, the adverse implications of
16 (1) Southern Pioneer's C-corporation business structure, (2) Southern Pioneer's
17 decision to refinance its Federal Financing Bank (FFB) debt, (3) the premium
18 paid by Southern Pioneer to acquire the Aquila assets, and (4) the MKEC spin-
19 down of subtransmission assets to Southern Pioneer, and he provides
20 conclusions and recommendations to balance the interests of Southern Pioneer
21 and its customers. On the latter topic, Mr. Daniel discusses serious flaws in
22 Applicant's proposed DSC Ratemaking Plan giving rise to his recommendation
23 that it should be rejected. He also recommends that if the Commission decides

1 to approve the DSC Ratemaking Plan notwithstanding his contrary
2 recommendation, the Commission should require specific modifications to the
3 DSC Ratemaking Plan before it should go into effect.

4 **Q. WHAT ISSUES DOES KEPCo HAVE WITH THE DEFINITION OF**
5 **MONTHLY BILLING DEMAND INCLUDED IN THE LOCAL ACCESS**
6 **DELIVERY SERVICE TARIFF?**

7 A. Mid-Kansas' present and proposed Rate Schedules 9-LAC and 11-LAC
8 provided in Exhibits RJM-9, RJM-10 and RJM-11 include the following definition
9 of the Monthly Billing Demand for Local Access Delivery Service: "Monthly
10 Billing Demand shall be defined as the Customer's demand as measured at the
11 low side of the delivery point substation." This definition does not provide
12 sufficient clarity to establish the proper billing determinant for the LAC. The
13 definition could be read as being the non-coincident peak (NCP) demand at each
14 delivery point. As a result, the definition is unacceptably vague and ambiguous.
15 The monthly billing demand in Exhibit RJM-5, page 5 used to design the LAC
16 represents the maximum hourly coincident peak (CP) demand on Southern
17 Pioneer's Local Access Delivery System.² Given that Applicant is using the
18 maximum hourly CP demand on Southern Pioneer's Local Access Delivery
19 System, the monthly billing determinants should reflect each customer's monthly
20 contribution to the maximum hourly CP demand.

21 **Q. WHY IS THIS ISSUE SIGNIFICANT?**

² Mid-Kansas response to KEPCo Data Request No. 3-1(b).

1 A. Because of load diversity, or the lack of coincidence in peaks for individual
2 loads, NCP demand for a given customer is typically larger, and can never be
3 smaller than that customer's CP demand, for any given period. This concept is
4 reflected in the term "coincidence factor," which is the ratio of the CP demand to
5 the NCP demand for a given period, and which is never greater than 100%, and
6 reflects the diversity of peaks. For a coincident factor of 75%, the CP demand is
7 75% as great for a given period as the NCP demand. If a given rate has been
8 designed to recover 100% of a utility's cost to provide a particular service
9 according to the sum of its customers' CP demands, yet it is permitted to bill
10 customers according to the NCP demands, then all else being equal, a utility
11 would unjustly recover 133% of its cost of providing the service (*i.e.*, $100\%/75\%$),
12 because the rate would be set 33% too high. Fundamentally, the billing
13 determinants used to collect the utility's cost must be consistent with the rate
14 design used to develop the rate and bill the customers.

15 **Q. HOW DO YOU RECOMMEND ADDRESSING THE DEFINITION OF**
16 **"MONTHLY BILLING DEMAND" IN THE LOCAL ACCESS DELIVERY RATE**
17 **SCHEDULE?**

18 A. KEPCo encountered the same issue for Local Access Delivery Service
19 from MKEC as it relates to the Wheatland Electric Division in KCC Docket No.
20 11-MKEE-439-RTS (439 Docket). KEPCo recommends that the definition be
21 amended, as it was in the 439 Docket, to specify the use of CP demand, to which
22 the rate will be applied, to be consistent with the basis for the rate design used to
23 develop the LAC. KEPCo believes the definition should read as follows:

1 "When service is provided in association with network service, the Monthly
2 Billing Demand shall be defined as the Customer's kilowatt contribution to
3 the maximum hourly coincident demand coincident with Southern
4 Pioneer's monthly Local Access Delivery System peak in the billing month,
5 as measured at the low side of the delivery point. For other local access
6 service (including, but not limited to, point-to-point transmission service
7 requiring local access service and service reservations), Monthly Billing
8 Demand shall be the greater of the Customer's service request or actual
9 maximum monthly demand."

10 A similar definition was ultimately agreed to and included in Wheatland's Local
11 Access Delivery Service tariff to settle the same concern that KEPCo raised in
12 the 439 Docket, which the Commission approved.³ Because Mid-Kansas has
13 developed its proposed LAC for the Southern Pioneer Division using the same
14 method as used for the Wheatland Division, KEPCo believes this amended
15 definition is appropriate.

16 **Q. WHAT LOSS FACTORS HAS MID-KANSAS PROPOSED IN THE**
17 **LOCAL ACCESS DELIVERY SERVICE RATE SCHEDULE FOR THE MID-**
18 **KANSAS SOUTHERN PIONEER DIVISION?**

19 A. Mid-Kansas has proposed provisions in its Local Access Delivery Service
20 tariff for Southern Pioneer for real power losses, which differentiate loss factors
21 for annual demand (2.75%), monthly demand (2.28%) and energy consumption
22 (2.08%) relating to certain specified billing determinants. See Exhibits RJM-10,
23 Schedule 11-LAC, sheet 1 and RJM-11, Schedule 11-LAC, sheet 1.

24 **Q. WHAT LOSS FACTORS HAS THE COMMISSION AUTHORIZED FOR**
25 **MID-KANSAS' SOUTHERN PIONEER DIVISION?**

³ *In the Matter of the Application of Mid-Kansas Electric Company, LLC for Approval to Make Certain Changes in its Charges for Electric Service, Docket No. 11-MKEE-439-RTS, Order Approving Stipulation and Agreement, June 30, 2011, ¶ 20 and Stipulation and Agreement, June 2, 2011, ¶ 12.*

1 A. The Commission has authorized Mid-Kansas to assess charges for
2 replacing losses related to Southern Pioneer's Local Access Delivery Service at
3 a rate of 1.86% for energy consumed as measured at the point of delivery of
4 Southern Pioneer's 34.5 kV facilities.⁴

5 **Q. HAS MID-KANSAS PROVIDED SUPPORT TO CHANGE THE**
6 **PROVISION FOR LOSSES IN THE LAC RATE SCHEDULE?**

7 A. No. KEPCo has not found anything in Mid-Kansas' Application that
8 supports a change in loss factors for Southern Pioneer's Local Access Delivery
9 System. Further, as evident from Exhibit RJM-9, Schedule 09-LAC, sheet 1 and
10 review of the MKEC's present Local Access delivery Service tariff for the
11 Southern Pioneer Division on file at the Commission, which is shown to be
12 approved in Docket No. 09-MKEE-969-RTS (969 Docket) on January 14, 2010, I
13 note that Mid-Kansas' present tariff includes the same loss factors as included in
14 the proposed Schedule 11-LAC. As I mentioned earlier, however, the
15 Commission authorized a loss factor of 1.86% for energy consumed as
16 measured at the point of delivery. Clearly, Mid-Kansas' existing Local Access
17 Delivery Service tariff does not comply with the Commission's Order.

18 **Q. WHY DO THE LOSS FACTORS IN THE EXISTING TARIFF DIFFER**
19 **FROM THE LOSS FACTOR APPROVED IN THE COMMISSION'S ORDER?**

20 A. Applicant acknowledged that a mistake was made in the January 14, 2010
21 compliance tariff filing in the 969 Docket, that the proposed tariffs reflecting the

⁴ *In the Matter of the Application of Mid-Kansas Electric Company, LLC for Approval to Make Certain Changes in its Charges for Electric Service, Docket No. 09-MKEE-969-RTS, Order Approving Unanimous Stipulation and Agreement, January 11, 2010, Stipulation and Agreement, §III(D)(8).*

1 erroneous Loss Factors were accepted by the Commission staff in response to
2 that compliance filing, and that Mid-Kansas will correct the error in the current
3 docket.⁵ Because proposed (and present) loss factors are unsupported and
4 based on an error that was perpetuated in the Application, KEPCo agrees and
5 recommends that the Local Access Delivery Service tariff be amended to provide
6 for a single loss factor of 1.86% of energy measured at the delivery point, to
7 reflect the Commission-authorized loss factor.

8 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

9 **A. Yes.**

⁵ Mid-Kansas response to KEPCo Data Request No. 1-47. Applicant noted in its response that Mid-Kansas has been charging the rate agreed to in the Stipulation.

Kansas Electric Power Cooperative, Inc.
Information Request

Request No: 1-47

Company Name MID-KANSAS ELECTRIC COMPANY, LLC
Docket Number 12-MKEE-380-RTS
Request Date February 3, 2012
Date Information Needed February 17, 2012
RE: MKEC's Application of December 20, 2011

Please Provide the Following:

- a. An unconditional admission that the Loss Factors listed in the Local Access Delivery Service tariff provided in Exhibit RJM-9 of Mr. Macke were not approved or authorized by the Kansas Corporation Commission (KCC) in Docket No. 09-MKEE-969-RTS.

ANSWER:

The compliance tariffs filed after the Commission's Order in the 969 Docket have loss percentages that are not the same as the loss percentages listed in the 969 Stipulation and Agreement. RJB-9 reflects the tariffs as approved by the Commission on January 14, 2010.

- b. If the response to subpart a., above, is other than an unconditional admission, a detailed explanation of that response.

ANSWER:

A mistake was made in the tariff filing. Mid-Kansas has been charging the rate agreed to in the Stipulation and will correct the error in the tariff as part of this docket.

- c. An unconditional admission that the loss factor applicable to Local Access Delivery Service for the MKEC Southern Pioneer Division approved by the KCC in Docket No. 09-MKEE-969-RTS is 1.86 percent, as specified in paragraph 8 of the Stipulation and Agreement attached to the KCC January 11, 2010 Order Approving Unanimous Stipulation and Agreement, and that the KCC has not since authorized a change to that loss factor.

ANSWER:

See answer to (a) above. The Stipulation specifies a loss factor for the Southern Pioneer Division of 1.86 percent. The compliance tariffs with the error were approved by the Commission on January 14, 2010. As stated above, the error will be corrected.

- d. If the response to subpart c., above, is other than an unconditional admission, a detailed explanation of that response.

- e. An unconditional admission that Applicant has not provided any support for changes to the Loss Factor applicable to Local Access Delivery Service for the MKEC Southern Pioneer Division approved by the KCC in Docket No. 09-MKEE-969-RTS, and does not intend to include any loss factor other than the 1.86 percent approved in that docket, despite the Loss Factors specified in Exhibits RJM-10 and RJM-11.

ANSWER:

See answer to (a), (b), and (c) above.

- f. If the response to subpart e., above, is other than an unconditional admission, a detailed explanation of that response.

Submitted By KEPCo

Submitted To MKEC

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

VERIFICATION OF RESPONSE

I have read the foregoing Information Request 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 KEPCo any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: Donald L. Gulley
Donald L. Gulley (Feb 28, 2012)

Name: Donald L. Gulley

Position: Senior Manager, Regulatory Relations
and Billing, Mid-Kansas

Dated: February 28, 2012

KANSAS ELECTRIC POWER COOPERATIVE, INC.
Information Request

Request No. 3-1

Company Name MID-KANSAS ELECTRIC COMPANY, LLC
Docket Number 12-MKEE-380-RTS
Request Date February 17, 2012
Date Information Needed March 2, 2012
RE: MKEC's Application of December 20, 2011

Please provide the following:

With reference to Macke Exhibit RJM-5, page 5:

- a. A detailed explanation of inputs used and corresponding sources of input data relied upon for development of this page.

Historical meter MV-90 meter data was used as inputs.

- b. A detailed, highly-specific description of what the monthly billing demand represents (i.e., whether it is the sum of each customer's kilowatt contribution to the maximum hourly coincident peak demand on Southern Pioneer's (SPEC) Local Access Delivery System in the billing month, or some other measure).

It is the maximum hourly coincident peak demand on Southern Pioneer's Local Access Delivery System.

- c. Assumptions used in calculating values that have been derived from inputs on this page.

Exceptions:

Kingman was held at 6,000 kW reservation.

Greensburg Wind Farm value was the hourly value at the time of the Southern Pioneer system coincident peak.

- d. A working electronic copy of the "Reference Workpaper" in footnote 1, with all formulae intact, in MS Excel format, if available, including support for the Total Local Access System demand.

See KCC_DR0138_SPEC_Hourly_Loads2010.xlsm. The demand amount in this file for Greensburg Wind Farm represents the reservation demand. The actual coincident peak demand for Greensburg Wind Farm was used in RJM-5.

e. Supporting documentation for the monthly demand figures appearing in line 1.

See answer to (d) above.

f. A detailed description of the location(s) on SPEC's system at which the monthly demand figures in line 1 were determined, and a detailed description of how they were derived, including whether they were directly metered, or calculated and how calculated.

See answers to (b) and (c) above.

Submitted By KEPCo
Submitted To MKEC

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find the 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 KEPCo any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: Donald L. Gulley
Donald L. Gulley (Mar 6, 2012)

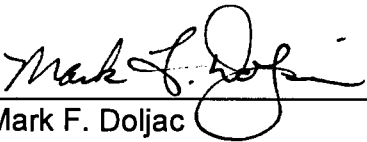
Date: Mar 6, 2012

VERIFICATION


STATE OF KANSAS)
) SS:
COUNTY OF SHAWNEE)

Mark F. Doljac, of lawful age, being first duly sworn upon oath states:

That he is the Director of Rates and Regulation for the Kansas Electric Power Cooperative, Inc. (KEPCo) in this matter; that he has read and is familiar with the foregoing document, and that he believes that the statements made therein are true and correct to the best of his information, knowledge, and belief.


Mark F. Doljac

Subscribed and sworn to before me this 19th day of April, 2012.


Notary Public



CERTIFICATE OF SERVICE
(12-MKEE-380-RTS)

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing was sent electronically on this 20th day of April, 2012, emailed to the following:

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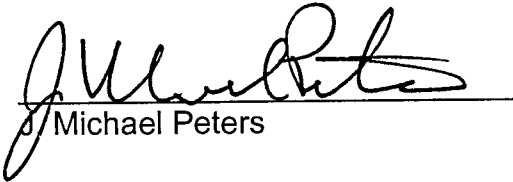
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