

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners: Brian J. Moline, Chair
Robert E. Krehbiel
Michael C. Moffet

OCT 31 2005

 Docket Room

In the Matter of the Applications of Westar)
Energy, Inc. and Kansas Gas and Electric) Docket No. 05-WSEE-981-RTS
Company for Approval to Make Certain)
Changes in their Charges for Electric)
Service.

CURB MOTION TO FILE SUPPLEMENTAL TESTIMONY

COMES NOW, the Citizens' Utility Ratepayer Board (CURB), and submits its Motion to File Supplemental Testimony to respond to and address the Stipulation and Agreement filed with the Commission on October 25, 2005, and the supplemental testimony of Mark Doljac filed on October 27, 2005, regarding the transmission delivery charge (TDC) at issue in this proceeding. In support of said Motion, CURB alleges and states as follows:

1. Westar's original filing in this docket included a proposal to implement a TDC as a separate tariff to unbundle its retail rates and collect the associated revenue requirement through a distinct charge. The use of a TDC by an electric utility is authorized by K.S.A. 66-1237.
2. On September 9, 2005, Staff, CURB, and other parties filed testimony with regard to the TDC proposal made by Westar in its original filing.
3. On October 3, 2005, Westar filed Rebuttal testimony regarding the TDC issue.
4. On October 17, 2005, the technical hearing in this docket was commenced.
5. On October 25, 2005, Westar and Staff filed a Joint Motion For Approval of Stipulation and Agreement and a Stipulation and Agreement (TDC Stipulation), in which the

positions of both Westar and Staff on the TDC issue were significantly altered.

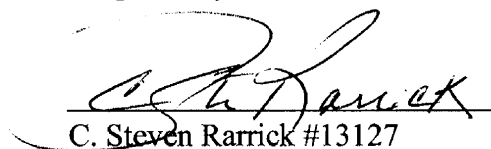
6. On October 27, 2005, Staff filed a Motion to File Supplemental Testimony, wherein the supplemental testimony of Staff Witness Mark Doljac was offered to explain the TDC implementation process and accounting adjustments agreed upon by Westar and Staff in the TDC Stipulation

7. While CURB witness Brian Kalcic originally filed testimony with regard to the TDC on September 9, 2005, the positions originally taken by Westar and Staff have changed significantly in the TDC Stipulation. As a result, CURB respectfully requests the Commission allow CURB to file the supplemental testimony of CURB witness Brian Kalcic to respond to and address Mr. Doljac's testimony and the TDC implementation process and accounting adjustments proposed by Staff and Westar in the TDC Stipulation.

8. Mr. Kalcic's supplemental testimony is attached to this Motion.

WHEREFORE, CURB respectfully requests the Commission grant CURB's motion to file the supplemental testimony of Brian Kalcic.

Respectfully submitted,




C. Steven Rarrick #13127
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
(785) 271-3200
(785) 271-3116 Fax

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I, C. Steven Rarrick, of lawful age, being first duly sworn upon his oath states:

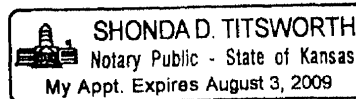
That he is an attorney for the above named petitioner; that he has read the above and foregoing, and, upon information and belief, states that the matters therein appearing are true and correct.


C. Steven Rarrick

SUBSCRIBED AND SWORN to before me this 31st day of October, 2005.


Notary of Public

My Commission expires: 08-03-2009.



BEFORE THE
KANSAS CORPORATION COMMISSION

In the Matter of the Applications)
of Westar Energy, Inc. and Kansas)
Gas and Electric Company for)
Approval to Make Certain Changes)
in their Charges for Electric Service.)

Docket No. 05-WSEE-981-RTS

SUPPLEMENTAL TESTIMONY OF

BRIAN KALCIC

ON BEHALF OF
THE CITIZENS' UTILITY RATEPAYER BOARD

October 31, 2005

1 **Q. Please state your name and business address.**

2 A. Brian Kalcic, 225 S. Meramec Avenue, St. Louis, Missouri 63105.

3

4 **Q. Have you previously submitted direct testimony in this proceeding?**

5 A. Yes, I have.

6

7 **Q. What is the subject of your supplemental testimony?**

8 A. I will respond to the supplemental testimony of Mark F. Doljac on behalf of the Staff of the
9 State Corporation Commission of the State of Kansas (“Staff”), which was filed in support
10 of the Transmission Delivery Charge (“TDC”) Stipulation and Agreement (“S&A”) entered
11 into by Staff and Westar.

12

13 **TDC S&A**

14 **Q. Mr. Kalcic, have you had the opportunity to review the proposed TDC S&A and**
15 **supporting exhibits?**

16 A. Yes, I have.

17

18 **Q. How does the methodology used in the TDC S&A for determining the jurisdictional**
19 **portion of Westar’s claimed TDC revenue requirement differ from that employed in**
20 **the Company’s filed case?**

21 A. There are two (2) major differences. The first involves a reallocation of the Company’s
22 claimed TDC revenue requirement of \$81.571 million between jurisdictional and non-
23 jurisdictional customers. This reallocation is necessitated by the fact that the TDC S&A

1 removes *all* wholesale demand contributions from the Company’s total 12 monthly
 2 coincident peak (“12-CP”) transmission demand to determine the retail transmission
 3 demand contributions of each operating division. In contrast, only a portion of such
 4 wholesale demand was removed from the reported “retail” transmission demand of each
 5 operating division in the Company’s filed case.

6 The second change is an accounting adjustment pertaining to the level of wholesale
 7 transmission revenues to be removed from Westar’s retail cost of service. This accounting
 8 adjustment is a by-product of the previously identified change in jurisdictional TDC cost
 9 responsibility. Consistent with the removal of all wholesale transmission loads (i.e., costs),
 10 the TDC S&A seeks to remove *all* wholesale transmission revenues from the base rate
 11 portion of Westar’s retail cost of service. In the Company’s filed case, a portion of
 12 wholesale transmission revenues remained in Westar’s claimed cost of service, acting as a
 13 credit to retail base rates.

14
 15 **Q. What would be the net impact of the TDC S&A on jurisdictional customers?**

16 A. The net impact is summarized in Table 1 below. If the TDC S&A were to be approved, the
 17 net impact on jurisdictional customers would be an increase in total revenue responsibility
 18 of \$13.251 million over that reflected in the Company’s filed case.

19 Table 1

	<i>Westar Filed Case</i>	<i>Proposed TDC S&A</i>	<i>Difference</i>
Jurisdictional TDC Allocation	\$71,676,528 a/	\$62,509,409 b/	(\$9,167,119)
Wholesales Transmission Revenues Removed	\$4,206,064	\$26,624,312	<u>\$22,418,248</u>
Net Retail COS Adjustment			\$13,251,129

1 Source: As filed, 87.87% of \$81.571 million.
2 Per TDC S&A, 76.60% of \$81.571 million.
3

4 **Q. Does CURB support the TDC S&A, as filed?**

5 A. No, it does not.
6

7 **Q. Why?**

8 A. The proposed TDC S&A fails to unbundled wholesale transmission revenues properly, with
9 the result that it removes too much wholesale revenue from Westar's claimed retail cost of
10 service, to the detriment of jurisdictional customers.
11

12 **Q. Please explain.**

13 A. Conceptually, CURB agrees that if 100% of wholesale transmission cost is removed from
14 retail cost of service, then 100% of wholesale transmission revenues should also be
15 removed. However, not all of Westar's wholesale transmission revenue is readily identified
16 on the Company's books.¹ In particular, revenues booked to Account 447 – Sales for
17 Resale is derived largely from bundled wholesale contracts that cover *both* transmission-
18 and production-related costs.² As a result, the TDC S&A must “impute” a certain level of
19 transmission revenues to wholesale customers from Account 447 before such revenue can
20 be removed from the Company's retail cost of service.³ In CURB's view, the imputation
21 methodology contained in the proposed TDC S&A is deficient and penalizes jurisdictional
22 customers.

¹ Wholesale transmission revenues are booked to Account 456 – Other Electric Revenues and Account 447 – Sales for Resale.

² See the Rebuttal Testimony of Robert F. Oakes at 9.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21

Q. How does the TDC S&A identify the portion of Account 447 revenues that are transmission related?

A. In essence, the TDC S&A unbundles the revenues in Account 447 by multiplying Westar’s proposed FERC transmission rate by its associated 12-CP wholesale transmission demands, by type of wholesale service. The resulting revenues are *deemed* to be the transmission-related portion of Account 447.

Q. How much Account 447 revenue is deemed transmission related in the TDC S&A?

A. The total revenue booked to Account 447 is \$48.971 million, of which \$7.959 million is considered transmission related.⁴

Q. Mr. Kalcic, why do you conclude that the methodology used to unbundle Account 447 revenues in the TDC S&A is deficient?

A. The methodology is actually deficient on two levels. First, the methodology employs the Company’s *proposed* FERC transmission rate to unbundle *present* (i.e., test year) Account 447 revenues. This mismatch imputes too great a level of transmission revenues to the bundled Account 447 revenues derived from Westar’s existing wholesale contracts. At a minimum, therefore, the Commission should order Westar to employ its present FERC transmission rate to unbundle test year Account 447 revenues.

³ See Paragraph 3 of the proposed TDC S&A.

⁴ See Exhibit __MD-1, Schedule B in Mr. Doljac’s Supplemental Testimony.

1 **Q. Have you revised the proposed TDC S&A unbundling methodology to reflect this**
2 **change?**

3 A. Yes, I have. The results are shown in Schedules BK-1S through BK-3S.⁵

4
5 **Q. What is the overall impact of this change in methodology?**

6 A. As shown in Schedule BK-3S, the Company's present FERC transmission rate for point-to-
7 point service is \$1.3925 per KW-mo, including SPP Administrative Fees and Related
8 Assessments. Using this present FERC rate in place of the \$1.7234 per KW-mo that
9 appears in Exhibit__MD-1, Schedule B results in unbundled Account 447 transmission
10 revenues totaling \$6,335,597.⁶ The total amount of transmission revenue to be removed
11 from Westar's cost of service becomes \$17,716,025, rather than the \$19,094,238 shown in
12 Exhibit__MD-1, Schedule B, which represents a total savings to jurisdictional customers of
13 \$1,378,213.

14

15 **Q. Please discuss the second concern that you have regarding Account 447 revenues.**

16 A. There exists a second issue in connection with unbundling Account 447 revenues that is
17 more fundamental in nature. As previously noted, the wholesale revenues that are booked
18 to Account 447 are derived from existing bundled contracts. By applying a FERC
19 transmission rate to Westar's wholesale billing determinants, the TDC S&A derives not
20 only an unbundled (i.e., imputed) wholesale transmission revenue level, but an implicit

⁵ For ease of comparison, the individual formats of Schedules BK-1S, BK-2S and BK-3S are identical to those of Exhibit__MD-1, Schedules A, A-1 and B, respectively.

⁶ Unlike the proposed TDC S&A, Schedule BK-3S also treats *all* Account 456 revenues as transmission related, consistent with Mr. Oakes' representation on page 10 of his Rebuttal Testimony that no portion of such revenue is generation-related.

1 wholesale generation revenue level as well. The imputed wholesale generation revenue
2 level is simply the *residual* level revenue that remains in Account 447, or \$41,013,158 per
3 Exhibit__MD-1, Schedule B.⁷ Unfortunately, neither the Company nor Staff has presented
4 any evidence that the residual wholesale generation revenues imputed to Account 447 are
5 sufficient to cover the generation costs attributable to those wholesale contracts.

6
7 **Q. What would be the implication of imputing an insufficient level of Account 447**
8 **revenue as generation related?**

9 A. This type of unbundling outcome would result in an inappropriate shift of wholesale
10 generation costs to jurisdictional customers.

11
12 **Q. Could you please explain why?**

13 A. Yes. Account 447 represents a single pool of wholesale revenues, from which
14 Westar must recover its wholesale contract-related transmission and generation
15 costs. By applying a FERC transmission rate to wholesale billing determinants, the
16 TDC S&A unbundling methodology assures that Westar will recover its wholesale
17 transmission costs, *without regard as to whether the residual revenues are sufficient*
18 *to cover Westar wholesale generation costs*. This outcome leaves jurisdictional
19 customers at risk for any unrecovered wholesale generation costs.

20 Stated differently, if the TDC S&A had unbundled Account 447 revenues in
21 a manner that first assured that retail customers were made whole for the generation

⁷ The total Account 447 revenue shown in Exhibit__MD-1, Schedule B is \$48,971,765. If one subtracts from this total the imputed transmission portion of \$7,958,607, the residual wholesale generation revenue becomes \$41,013,158.

1 costs associated with Westar's wholesale contracts, with the residual Account 447
2 revenue deemed transmission related, there is no assurance that such residual
3 transmission revenues would be a positive amount, much less the \$7,958,607 shown
4 in the TDC S&A.

5
6 **Q. Mr. Kalcic, have you had the opportunity to review the bundled wholesale contracts
7 that are at issue here?**

8 A. No, I have not.

9
10 **Q. Do you have any basis to determine at this time whether or not the TDC S&A would
11 leave an appropriate level of unbundled generation-related revenues in Account 447?**

12 A. No.

13
14 **Q. Would it be appropriate for the Commission to approve the proposed TDC S&A
15 unbundling methodology without the assurance that the unbundled wholesale
16 generation revenues that remain are sufficient to cover the wholesale generation costs
17 associated with Westar's bundled wholesale contracts?**

18 A. In my opinion, no. It is my understanding that the Commission no longer has jurisdiction
19 over Westar's transmission-related revenue requirement. Instead, FERC will determine
20 Westar's transmission revenue requirement, the jurisdictional portion of which will be
21 automatically passed along to retail customers via the TDC in the future. As such, I believe
22 it is particularly important that the Commission approves a TDC mechanism that does not
23 penalize jurisdictional customers.

1

2 **Q Do you have any recommendation as to how the Commission could protect**
3 **jurisdictional customers in ruling on the proposed TDC S&A?**

4 A. Yes, I do. In the absence of an analysis of Westar's bundled wholesale contracts, which
5 would, in theory, assure an appropriate unbundling outcome for Account 447, I would
6 recommend that the Commission treat 100% of the Account 447 revenues shown in
7 Exhibit__MD-1, Schedule B as generation related. This approach would retain \$7.958
8 million of Account 447 revenue as a credit to Westar's retail cost of service, and reduce the
9 net impact of the proposed TDC S&A on retail customers that is shown on Exhibit__MD-1,
10 Schedule A by a like amount.

11

12 **Q. Mr. Kalcic, does the proposed TDC S&A address the ancillary service revenue credit**
13 **issue that you raised in your direct testimony?**

14 A. No, the TDC S&A is completely silent on the matter of the proper level of non-
15 jurisdictional ancillary service charge revenues to be credited toward the base rate revenue
16 requirement of jurisdictional customers.

17

18 **Q. And does your recommendation in that area remain unchanged?**

19 A. Yes, it does.

20

21 **Q. Does this conclude your supplemental testimony?**

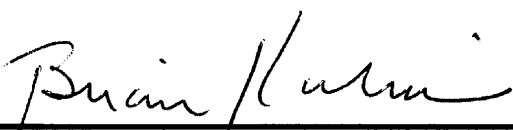
22 A. Yes.

VERIFICATION

STATE OF MISSOURI)
) ss:
COUNTY OF)


I, Brian Kalcic, of lawful age, being first duly sworn upon his oath states:

That he is a consultant for the Citizens' Utility Ratepayer Board; that he has read the above and foregoing Supplemental Testimony in response to the proposed TDC Stipulation and Agreement, and, upon information and belief, states that the matters therein appearing are true and correct.



Brian Kalcic

SUBSCRIBED AND SWORN to before me this 28TH day of OCTOBER, 2005.



Notary of Public

My Commission expires: 8/6/2006

NOTARY SEAL
JEFFREY P. MORLAND, NOTARY PUBLIC
ST. LOUIS COUNTY, STATE OF MISSOURI
MY COMMISSION EXPIRES 8/6/2006

Westar Energy, Inc.
Docket No. 05-WSEE-981-RTS
Summary of CURB Adjustments to Operations Related to Transmission Delivery Charge
Test Year Ended December 31, 2004

	Increase / (Decrease) to Operations		
	<u>WEN</u>	<u>WES</u>	<u>Westar Total</u>
<u>Staff Income Statement Adjustment No. 5</u>			
TRANSMISSION	(\$8,291,142)	(\$875,978)	(\$9,167,119)
Account 566 -- Miscellaneous Transmission Expenses - Formula Rate			
To adjust the Network Integration Transmission Service and SPP Admin. Fees allocated to retail customers based on FERC formula rate.			
<u>Staff Income Statement Adjustment No. 5A</u>			
ELECTRIC REVENUES			
Account 447 - Sales for Resale	(\$4,707,708)	(\$1,627,888)	(\$6,335,596)
Account 456 - Other Electric Revenues	(9,270,509)	(5,433,929)	(14,704,438)
	<u>(\$13,978,217)</u>	<u>(\$7,061,817)</u>	<u>(\$21,040,034)</u>
To adjust sales for resale and other electric revenues to remove transmission revenues associated with wholesale transactions.			
Net Impact of Staff Income Statement Adjustment Nos. 5 and 5A on Cost of Service	<u>\$5,687,075</u>	<u>\$6,185,839</u>	<u>\$11,872,915</u>

Westar Energy, Inc.
Docket No. 05-WSEE-981-RTS
CURB Adjustments to Operations Related to Transmission Delivery Charge

	Revenue Credit to Remove			Westar Direct Case Revenue already adjusted out of Acct. 456 Note (4)	Allocation Adjustment (Acct. 456) Note (5)	Staff IS Adj. #5A	Staff IS Adj. #5	Net adjustment after removing wholesale transmission revenue credits Note (8)
	Account 456 - Other Electric Revenues Note (1)	Account 447 - Sales for Resale Note (2)	Total Revenue Credit Removal Note (3)			REVENUE ADJUSTMENT Note (6)	Account 566 - Miscellaneous transmission expenses - Formula Rate Note (7)	
A	B	C	D	E	F	G	H	I
WEN	\$ 7,688,948	\$ 4,707,708	\$ 12,396,656	\$ (2,173,718)	\$ 3,755,279	\$ 13,978,217	(\$8,291,142)	\$ 5,687,076
WES	3,691,480	1,627,888	5,319,368	(2,032,346)	3,774,795	7,061,817	(\$875,978)	6,185,840
Westar Total	\$ 11,380,428	\$ 6,335,597	\$ 17,716,025	\$ (4,206,064)	\$ 7,530,074	\$ 21,040,035	\$ (9,167,119)	\$ 11,872,915

Notes

Note (1) - Schedule BK-3S, column G.

Note (2) - Schedule BK-3S, column H.

Note (3) - Sum of columns B and C.

Note (4) - Company work paper: "Westar North, TCR - W/P Summary" and "Westar South, TCR - W/P Summary", p. 2, Jurisdictional Pro Forma Adjustments, Account 456 Revenues Wholesale.

Note (5) - Allocation Adjustment of Account 456 - Other Revenue SPP NITS - Retail was developed as follows:

Applicant Pro Forma Adjustment
KCC Jurisdictional

	Total Company	Applicant Direct	Company Total	Difference
<u>456 Other Rev SPP NITS-Retail</u>				
Allocation Factor		87.87%	100.00%	
WEN	30,958,607	27,203,328	30,958,607	(3,755,279)
WES	31,119,495	27,344,700	31,119,495	(3,774,795)

Note (6) - Sum of columns D, E and F.

Note (7) - Exhibit MD-2.

Note (8) - Sum of columns G and H.

Westar Energy, Inc.
Docket No. 05-WSEE-981-RTS
Removal of Revenue Credits Associated with Wholesale Transmission Service
Using Present Transmission Rates to Unbundle Present Account 447 Revenues

A	12 CP Demand (MW) Note (1)	Present Transmission Rate (\$/kW-mo) Note (2)	Present Assessed Cost Note (3)	Revenue Credit Booked		Revenue Credit to Remove		
				Account 456 - Other Electric Revenues	Account 447 - Sales for Resale	Account 456 - Other Electric Revenues Note (4)	Account 447 - Sales for Resale Note (5)	Total Revenue Credit Removal Note (6)
	B	C	D	E	F	G	H	I
<u>WEN</u>								
GFA Firm PTP	342.90	\$1.3925	\$ 5,729,859	\$ 7,336,308	\$ -	\$ 7,336,308	\$ -	\$ 7,336,308
Partial Requirements	225.97	\$1.3925	3,775,959	-	18,839,243	-	3,775,959	3,775,959
Full Requirements	55.76	\$1.3925	931,750	-	12,136,027	-	931,750	931,750
Other Wholesale	19.89	\$1.3925	332,362	352,640	1,521,343	352,640	-	352,640
WEN Total	644.52		\$ 10,769,929	\$ 7,688,948	\$ 32,496,613	\$ 7,688,948	\$ 4,707,708	\$ 12,396,656
<u>WES</u>								
GFA Firm PTP	342.90	\$1.3925	\$ 5,729,859	\$ 3,338,841	\$ -	\$ 3,338,841	\$ -	\$ 3,338,841
Partial Requirements	87.40	\$1.3925	1,460,454	-	9,262,422	-	1,460,454	1,460,454
Full Requirements	10.02	\$1.3925	167,434	-	2,559,047	-	167,434	167,434
Other Wholesale	19.89	\$1.3925	332,362	352,640	4,653,682	352,640	-	352,640
WES Total	460.21		\$ 7,690,109	\$ 3,691,480	\$ 16,475,152	\$ 3,691,480	\$ 1,627,888	\$ 5,319,368
Westar Total			\$ 18,460,038	\$ 11,380,428	\$ 48,971,765	\$ 11,380,428	\$ 6,335,597	\$ 17,716,025

Present PTP Transmission Service Rate	\$1.3000
SPP Administrative Fees & Related Assessments	<u>0.0925</u>
Total	\$1.3925

Notes

Note (1) - Reflects 12 CP demands presented in Oakes Rebuttal, Exhibit RFO-4, pp. 2-3. For GFA Firm PTP demand, Staff determined total demand on Westar's system based on Oakes Rebuttal, Exhibit RFO-4, pp. 2-3, Note 2, and applied 50% each to WEN and WES, consistent with Westar's allocation.

Note (2) - Reflects the sum of Westar's present PTP Transmission Service Rate and SPP Administrative Fees and Related Monthly Assessment unit costs.

Note (3) - Present assessed cost is the product of 12 CP demand (column B) and the transmission rate (column C).

Note (4) - Reflects the Account 456 Revenue to be removed from the retail cost of service (COS), which is the total of the Account 456 revenues booked (column E).

Note (5) - Reflects the Account 447 Revenue to be removed from the retail COS, which is the lower of the present assessed cost (column D) and the Account 447 revenues booked (column F), less any Account 456 revenues booked (column E), but in no event less than zero.

Note (6) - Reflects the sum of the revenue credit removals for Accounts 456 (column G) and 447 (column H).

CERTIFICATE OF SERVICE

05-WSEE-981-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 31st day of October, 2005, to the following:

KURT J. BOEHM, ATTORNEY
BOEHM, KURTZ & LOWRY
36 EAST SEVENTH STREET
SUITE 1510
CINCINNATI, OH 45202
Fax: 513-421-2764
kboehm@bkllawfirm.com

MICHAEL L. KURTZ, ATTORNEY
BOEHM, KURTZ & LOWRY
36 EAST SEVENTH STREET
SUITE 1510
CINCINNATI, OH 45202
Fax: 513-421-2764
mkurtz@bkllawfirm.com

CHARLES M. BENJAMIN, ATTORNEY AT LAW
CHARLES M. BENJAMIN
P.O. BOX 1642
LAWRENCE, KS 66044-8642
Fax: 785-841-5922
chasbenjamin@sbcglobal.net

JAY C. HINKEL, ASSISTANT CITY ATTORNEY
CITY OF WICHITA
CITY HALL 13TH FLOOR
455 N MAIN STREET
WICHITA, KS 67202
Fax: 316-268-4335
jhinkel@wichita.gov

GARY E. REBENSTORF, CITY ATTORNEY
CITY OF WICHITA
CITY HALL 13TH FLOOR
455 N MAIN STREET
WICHITA, KS 67202
Fax: 316-268-4335
grebenstorf@wichita.gov

COLIN WHITLEY, GENERAL MANAGER
CITY OF WINFIELD
200 EAST 9TH
PO BOX 646
WINFIELD, KS 67156
cwhitley@winfieldks.org

CURTIS M. IRBY, ATTORNEY
GLAVES, IRBY & RHOADS
120 SOUTH MARKET
SUITE 100
WICHITA, KS 67202-3892
Fax: 316-264-6860
cmirby@sbcglobal.net

SARAH J. LOQUIST, ATTORNEY
HINKLE ELKOURI LAW FIRM L.L.C.
2000 EPIC CENTER
301 N MAIN STREET
WICHITA, KS 67202-4820
Fax: 316-264-1518
sloquist@hinklaw.com

JOHN WINE, JR.
410 NE 43RD
TOPEKA, KS 66617
Fax: 785-220-7676
jwine2@cox.net

DANA BRADBURY, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
Fax: 785-271-3354
d.bradbury@kcc.state.ks.us
**** Hand Deliver ****

SUSAN CUNNINGHAM, GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
Fax: 785-271-3354
s.cunningham@kcc.state.ks.us
**** Hand Deliver ****

MICHAEL LENNEN, ATTORNEY
MORRIS, LAING, EVANS, BROCK & KENNEDY,
CHARTERED
OLD TOWN SQUARE
300 N MEAD STREET
SUITE 200
WICHITA, KS 67202-2722
Fax: 316-262-5991
mlennen@morrislaing.com

CERTIFICATE OF SERVICE

05-WSEE-981-RTS

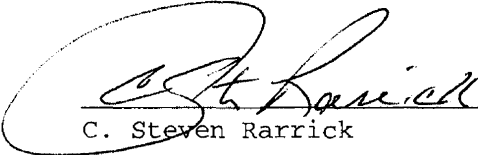
KEVIN K. LA CHANCE, ATTORNEY
OFFICE OF THE STAFF JUDGE ADVOCATE
HQ, 24TH INFANTRY DIVISION & FORT RILEY
BUILDING 200, PATTON HALL
FORT RILEY, KS 66442-5017
Fax: 785-239-0577
lachancek@riley.army.mil

DAVID BANKS, ENERGY MANAGER
UNIFIED SCHOOL DISTRICT 259
SCHOOL SERVICE CENTER COMPLEX
3850 N HYDRAULIC
WICHITA, KS 67219-3399
Fax: 316-973-2150
dbanks@usd259.net

MARTIN J. BREGMAN, EXECUTIVE DIRECTOR, LAW
WESTAR ENERGY, INC.
818 S KANSAS AVENUE (66612)
PO BOX 889
TOPEKA, KS 66601-0889
Fax: 785-575-8136
martin_bregman@wr.com

JAMES P. ZAKOURA, ATTORNEY
SMITHYMAN & ZAKOURA, CHTD.
7400 W 110TH STREET
SUITE 750
OVERLAND PARK, KS 66210
Fax: 913-661-9863
zakoura@smizak-law.com

ROBERT A. GANTON, ATTORNEY
UNITED STATES DEPARTMENT OF DEFENSE
D/B/A UNITED STATES DEPARTMENT OF DEFENSE
REGULATORY LAW OFFICE
DEPARTMENT OF THE ARMY
901 N. STUART STREET, SUITE 525
ARLINGTON, VA 22203-1837
Fax: 703-696-2960
robert.ganton@hqda.army.mil


C. Steven Rarrick