

Exhibit No.:
Issue: Customer Complaint
Witness: Jason A. Henrich
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Kansas City Power & Light Company
Case No.: EC-2011-0383
Date Testimony Prepared: October 7, 2011

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EC-2011-0383

REBUTTAL TESTIMONY

OF

JASON A. HENRICH

ON BEHALF OF

KANSAS CITY POWER & LIGHT COMPANY

**Kansas City, Missouri
October 2011**

**Certain Schedules Attached To This Testimony Designated “(HC)”
Contain Highly Confidential Information
And Have Been Removed
Pursuant To 4 CSR 240-2.135.**

REBUTTAL TESTIMONY

OF

JASON A. HENRICH

Case No. EC-2011-0383

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

2 A: My name is Jason Henrich. My business address is 10700 E. State Route 350, Raytown,
3 Missouri 64138.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Kansas City Power & Light Company (“KCP&L” or “Company”) as
6 Manager, Customer Care Center.

7 **Q: What are your responsibilities?**

8 A: My general responsibilities include overseeing the daily operations of the Company’s call
9 center. This includes management of the call center agents and supervisors as well as
10 technology used for and by the call center (such as IVR, web tools, call routing, etc.).

11 **Q: Please describe your education, experience and employment history.**

12 A: I received a Master of Business Administration degree from Baker University in Baldwin
13 City, Kansas. I also received a Bachelor of Science degree in Electrical Engineering
14 from MSOE (the Milwaukee School of Engineering) in Milwaukee, Wisconsin.

15 **Q: Please provide your work experience.**

16 A: I was hired by KCP&L in 2006 as the Manager, Customer Contact Center. Prior to my
17 employment with KCP&L, I was employed by Gateway from 2002 to 2006, where I held
18 a number of positions including Training Manager, Sales Manager, and Internal
19 Communication Manager.

1 **Q: What is the purpose of your testimony?**

2 A: The purpose of my testimony is to respond to issues presented in the direct testimonies
3 filed by Mr. Nathaniel Hagedorn with Briarcliff Development Company and to assist in
4 offering context regarding the process involved in account setup.

5 **Q: Have you reviewed the direct testimonies of Mr. Nathaniel Hagedorn on behalf of**
6 **Briarcliff Development and Mr. Michael S. Scheperle on behalf of the Missouri**
7 **Public Service Commission Staff?**

8 A: Yes.

9 **Q: When was electric service initially provided at 4100 N. Mulberry Drive, Kansas**
10 **City, Missouri (the “Property”)?**

11 A: Electric service began on May 7, 1999 and continued through June 14, 1999 in the name
12 of Briarcliff West Development at the request of Lee Swartz (Schedule JAH-1). At this
13 time Briarcliff West Development was the legal entity responsible for payment for
14 electric service.

15 **Q: Who was the customer of record for the Property from June 15, 1999 through**
16 **August 5, 2009?**

17 A: Service at the Property was put in the name of Winbury Realty at the request of Dianna
18 Painter, Tenant Relations Specialist with Winbury Group on June 14, 1999 (Schedule
19 JAH-2). KCP&L is familiar with both Winbury Group and Winbury Realty (Winbury)
20 acting as property managers. It is my understanding that Winbury Reality and Winbury
21 Group share similar management employees and the same mailing address.

1 **Q: Why was the customer of record changed on this account?**

2 A: KCP&L followed the normal process in establishing an account in a new customer name.
3 The service was established under the name provided to KCP&L by Ms. Painter. It is not
4 unusual for Winbury acting as the property manager to request changes be made to the
5 customer of record. With the change in customer name to Winbury Realty, that legal
6 entity became responsible for payment.

7 **Q: Who holds the responsibility for providing the name of the customer of record on**
8 **the account?**

9 A: It is the responsibility of the customer to disclose to KCP&L the correct name the
10 account is to be placed in.

11 **Q: How did Briarcliff Development become the customer of record?**

12 A: The Company was contacted by Jim Unruh, Senior Vice President of the Winbury Group
13 on August 5, 2009 to put the account in the name of Briarcliff Development (Schedule
14 JAH-3).

15 **Q: Did Winbury Realty contact KCP&L at any other time after the service was**
16 **changed to Briarcliff Development?**

17 A: Yes. On August 10, 2009, the Company was again contacted by a Jim Unruh. He stated
18 that Briarcliff was no longer going to be managed by their company and instead they
19 would be managing the Property in-house. Jim stated that bills should go to Skip
20 Rosenstock, who was the Senior Property Manager for Briarcliff Development from July
21 2009 to May 2011, at 4151 N. Mulberry, Ste. 205, Kansas City, Missouri 64116.

1 **Q: Was the Company contacted concerning the Property after the customer name on**
2 **the account was changed to Briarcliff Development?**

3 A: Yes. KCP&L was contacted on August 28, 2009 by Rebecca Hill, Chief Financial
4 Officer for Briarcliff Development to have the mailing addressed changed. Ms. Hill
5 contacted the Company again on September 17, 2009 to verify the mailing address had
6 been changed.

7 **Q: When did Briarcliff Development let KCP&L know this account should have been**
8 **in the name of Briarcliff Development during the period of June 15, 1999 through**
9 **August 5, 2009?**

10 A: KCP&L was contacted by a representative of Briarcliff Development on July 7, 2010.

11 **Q: Were the bills mailed to Briarcliff Development during the period the customer of**
12 **record was Winbury Realty?**

13 A: No. The bills were mailed to differing addresses for the two customers (Winbury Realty
14 and Briarcliff Development). The bills for the Property were mailed to the customer of
15 record (Winbury Realty), 4520 Main Street, Ste. 1000, Kansas City, Missouri from June
16 15, 1999 to September 22, 2009. Bills for Briarcliff Development are being mailed to
17 4151 N Mulberry, Ste. 205, Kansas City, Missouri to the attention of Skip Rosenstock.

18 **Q: Were payments received from Briarcliff Development during the period the**
19 **customer of record was Winbury Realty?**

20 A: No. Payments received for the accounts at the Property were received from different
21 bank accounts. While the account was in the name of Winbury Realty, payments were
22 received from The Winbury Group of Kansas City Disbursement Account, United
23 Missouri Bank (UMB). Since the customer of record changed to Briarcliff Development,

1 payments have been received from the account of Briarcliff I, also with UMB (Schedule
2 JAH-4).

3 **Q: Do you believe the Company acted properly in its efforts to establish this account?**

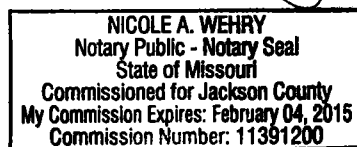
4 A: Yes.

5 **Q: Do you believe the Company consistently applied the terms of its tariffs?**

6 A: Yes. Please see the rebuttal testimony of Tim Rush, Director Regulatory Affairs, for
7 more information about the Company's tariff application.

8 **Q: Does that conclude your testimony?**

9 A: Yes, it does.



SCHEDULES JAH-1 THROUGH JAH-4

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