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from CC&B); Clean Charge Network
Witness: Charles A. Caisley
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Company
Case No.: ER-2018-0146
Date Testimony Prepared: January 30, 2018

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2018-0146

DIRECT TESTIMONY

OF

CHARLES A. CAISLEY

ON BEHALF OF

KCP&L GREATER MISSOURI OPERATIONS COMPANY

**Kansas City, Missouri
January 2018**

DIRECT TESTIMONY

OF

CHARLES A. CAISLEY

Case No. ER-2018-0146

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

2 A: My name is Charles A. Caisley. My business address is 1200 Main, Kansas City,
3 Missouri 64105.

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 Vice President – Marketing and Public Affairs.

7 **Q: On whose behalf are you testifying?**

8 A: I am testifying on behalf of KCP&L Greater Missouri Operations Company (“GMO”).

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

10 A: My responsibilities include the KCP&L’s and GMO’s small-scale distributed and
11 renewable generation projects, energy products and services platforms, energy efficiency
12 and demand response portfolio, community and customer strategy and communications,
13 marketing, economic development, governmental affairs and public relations functions.
14 Many of these areas are responsible for direct interaction with KCP&L and GMO
15 customers and stakeholders. These areas of direct customer interaction include:
16 online/electronic transactions and portals, social media, community affairs, business
17 customers, customer complaints, city franchises and regulated and non-regulated
18 products and services. In addition to having responsibility for multiple areas with direct
19 customer interaction, I am also responsible for leading a cross-functional team of

1 individuals with responsibility for our overall customer experience and strategy. This
2 includes customer research and segmentation as well as customer data analytics.

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

4 A: I graduated from the University of Illinois in Urbana-Champaign with a Bachelor's
5 degree in political science. I earned a Juris Doctorate degree from St. Louis University
6 School of Law and a Master of Business Administration from Washington University in
7 St. Louis. I joined KCP&L in 2007 as Director of Government Affairs. Prior to joining
8 KCP&L, I was employed by the Missouri Energy Development Association (MEDA),
9 the Missouri Industry Association for Missouri investor-owned utilities, as President.
10 Prior to that I was employed as the Chief of Staff to the Speaker of the Missouri House.
11 In both positions, I dealt extensively with Missouri utility law and energy policy.

12 **Q: Have you previously testified in a proceeding before the Missouri Public Service
13 Commission (“Commission” or “MPSC”) or before any other utility regulatory
14 agency?**

15 A: Yes, I have previously testified before the MPSC in Case No. EC-2015-0309 and the
16 Kansas Corporation Commission in Case No. 16-KCPE-160-MIS.

17 **PURPOSE AND REASON FOR THIS FILING**

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

19 A: The purpose of my testimony is to provide an overview of GMO’s Clean Charge
20 Network. In addition, I will describe the Customer Self Service (CSS) portals as a
21 component of the Company’s One CIS project.

CLEAN CHARGE NETWORK

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Q: Why is GMO requesting rate recovery of the electric vehicle charging stations (“EVCS”) in this case?

A: As discussed in the direct testimony of Tim Rush, the Commission did not allow EVCS costs to be recovered in rates in KCP&L’s last rate case. Because EVCS are an integral part of the Clean Charge Network (“CCN”)and the Company’s distribution system, GMO is asking the Commission to reconsider its position on the recovery of these costs.

Q: How does GMO’s CCN fit into the regulatory framework of a regulated public utility in Missouri?

A: GMO’s CCN is a function of providing electric service under GMO’s Certificate of Convenience and Necessity. GMO is able to integrate EVCS into its distribution system grid. EVCS allow GMO to provide regulated electric service to its mobile customers. EVCS are part of GMO’s regulated electric plant and should be recovered in its rates.

Q: Do EVCS and the CCN serve the public interest?

A: Yes. The CCN is in the public interest in Missouri because it places Missouri in the forefront of accommodating and promoting development of an industry that is expected to advance quickly in the near future, it brings a public charging network to Missouri in an efficient and effective manner, and it provides benefits to GMO’s Missouri customers and to Missouri citizens overall. Approval of the CCN tariff allows GMO’s service offerings to evolve to meet the demands of mobile customers in its certificated territory, ensuring continued provisioning of sufficient and efficient electric service at just and reasonable rates.

1 **Q. Please describe the CCN.**

2 **A.** In January 2015, KCP&L launched an initiative to install and operate just over 1,000 EV
3 charging stations throughout the Greater Kansas City region and within the
4 KCP&L(Missouri and Kansas) and GMO service territories. Currently, the Company has
5 installed 913¹ Level 2 stations and 16 Level 3 stations, or DC fast charge (“DCFC”) at
6 323 locations to support the growing market of electric vehicles (“EVs”).

7 **Q. Where are the EVCS located?**

8 **A.** The stations are located throughout the KCP&L and GMO service territories near where
9 people live and work.

10 The Company has placed the majority of the Clean Charge Network in workplace
11 and retail locations; however other venues have also been popular. Below is a summary
12 of EVCS installations by location type:

Workplace	28%	Hospitality	8%	Education	7%
Retail	20%	Multifamily	8%	Municipal	7%
Healthcare	11%	Parking Garage	8%	Parks and Rec	3%

13 The Company has placed 270 stations in KCP&L-Kansas, 399 stations in
14 KCP&L-Missouri, and 260 stations in GMO.

15
16 **Q. Please explain how EVCS host arrangements work.**

17 **A.** The standard host contract is for a term of ten years. The Company will install, own, and
18 maintain the EV charging station infrastructure. Hosts may have Level 2 or Level 3 or
19 both types of stations installed at their location. Those hosts who have Level 3 charging

¹ As of January 2, 2018.

1 stations, must agree to provide one parking space for a dual port Level 3 charging station
2 and 6-10 parking spots on average for 3-5 dual port Level 2 charging stations. The host
3 agreed to pay for the electricity used at the Level 2 charging stations for a period of 2
4 years, and a grant from Nissan paid for the electricity used at the Level 3 charging and a
5 third year of Level 2 charging through December 2017.

6 **Q. How is GMO currently billing users of the Clean Charge Network?**

7 **A.** For the first three years electric vehicle (“EV”) charging was free for all drivers. GMO
8 utilized a grant from Nissan to cover the cost of charging in the 3rd year. However, as of
9 January 1, 2018, the Clean Charge Network has moved to a host site or EV driver pay
10 model. Driver charging will continue to be free at host sites that have agreed to pay for
11 the cost of charging. Of the 929 stations, 180 stations will be host paid. These host paid
12 sites include retail locations, hospitals, and grocery stores, among others. For locations
13 that elected the driver pay model, the cost of charging will be billed to the driver on a per
14 kilowatt hour rate and paid by the driver through the ChargePoint payment collection
15 system.

16 **Q. How are EV drivers billed through the ChargePoint system?**

17 **A.** KCP&L has contracted with ChargePoint, the charging station vendor, for ongoing
18 charging station network operations, driver support services, and for the billing and
19 collection functions related to energy provided at the EV charging stations. Under the
20 Driver Pay scenario, individuals who charged their vehicles would be billed through the
21 meters in the charging station for the energy they used. The charging station and
22 ChargePoint’s web and mobile applications are able to tell the driver the rate he is going
23 to be charged as well as whether or not and when a session overstay fee would be

1 charged at that station. The payment is collected by ChargePoint, pursuant to an
2 agreement between ChargePoint and the charging customer, and remitted to the
3 Company. KCP&L will be able to compare usage recorded and paid for by all of the
4 stations at an installation cumulatively, to the monthly usage recorded by the utility meter
5 at the installation. The tariff proposed by GMO is discussed more fully in the Direct
6 Testimony of Company witness Mr. Tim M. Rush.

7 **Q. How does a customer sign up to use EVCS?**

8 A: Drivers can sign up and establish a ChargePoint customer account or directly with
9 ChargePoint to access stations on the KCP&L Clean Charge Network and over 21,000
10 EV charging spots nationwide on the ChargePoint network. Once the customer account
11 is established, the account holder must register the KCP&L Clean Charge Network (or
12 generic ChargePoint) radio frequency identification (“RFID”) cards that are authorized to
13 register charges against their account. The account holder may register CCN RFID cards
14 that they have received from KCP&L or car dealership, or they may request cards be sent
15 to them.

16 **Q: How does a customer use EVCS?**

17 A: Once a driver establishes a ChargePoint account, they can access a EVCS by using their
18 KCP&L CCN card, the ChargePoint mobile app, an RFID credit card or by calling driver
19 support at (888) 758-4389. The 888 number is listed on each charging station and on the
20 back of the KCP&L CCN card. How-to videos run on every charging station and
21 additional Frequently Asked Questions are available on KCP&L’s website at
22 [https://www.kcpl.com/media/indexedmedia/about_kcpl/ccn/cleanchargefaqsforevdriversf](https://www.kcpl.com/media/indexedmedia/about_kcpl/ccn/cleanchargefaqsforevdriversfinal.pdf)
23 [inal.pdf](https://www.kcpl.com/media/indexedmedia/about_kcpl/ccn/cleanchargefaqsforevdriversfinal.pdf). Drivers have access to 24/7 support, an advanced mobile app to help them find

1 available charging stations, notifications about charging status and much more. Drivers
2 can also save their favorite station locations, and track their energy use, gas savings, and
3 avoided greenhouse gas emissions.

4 **Q. Is an EV driver required to sign up with KCP&L to qualify for EVCS tariff?**

5 A. No. EV drivers may sign up for an account directly with ChargePoint and EV drivers
6 that do not have a ChargePoint account may access a CCN charge station by calling
7 ChargePoint driver support and providing a valid credit card. All EVCS charging will be
8 billed under the charging station tariff.

9 **Q. How will an EV driver know how much they are being billed to charge their EV at**
10 **EVCS?**

11 A. At charging stations operating under the driver pay model, the EVCS, ChargePoint's web
12 and the ChargePoint mobile application will all provide the driver the kWh rate they are
13 going to be charged along with any session overstay fees that could be assessed and all
14 applicable taxes that will be applied.

15 At the end of each charge session, all session cost components and taxes assessed
16 may be reviewed on the charge station and the driver can also elect to receive e-mails
17 and/or text messages containing the charge session cost details. The ChargePoint account
18 holder can also review a history of charging sessions that have been charged to their
19 account with the cost components for each charging session.

20 **Q: Can you explain the concept of the Session Overstay Fee contained in the proposed**
21 **tariff?**

22 A: The Company has the discretion under Schedule CCN ("Clean Charge Network") to
23 impose a Session Overstay Fee to incent customers to move their vehicles once the

1 charging process is completed so that other customers can have access to the charging
2 station. If a Session Overstay Fee is approved the driver would be provided a grace
3 period after the EV has completed charging before the Session Overstay Fee would be
4 imposed. The grace period allows the EV driver to receive notification (via text or e-
5 mail) and move their vehicle to avoid these charges.

6 **Q How does KCP&L intend to determine if a Session Overstay Fee should be applied?**

7 A: The Company plans to only implement the Session Overstay Fee when needed at
8 charging station locations based on the occupancy and availability of charging ports at
9 each host site location. Initially, KCP&L does not plan to implement the Session
10 Overstay Fee on any of the charging stations. The Company will monitor charge port
11 availability and overstay times and implement Session Overstay Fee at host locations
12 where the additional inducement is needed to get drivers to move their vehicle.

13 **Q. Will the Session Overstay Fee be the same at all Clean Charge Network locations?**

14 A. No. Schedule CCN sets a cap of \$6.00 per hour for Session Overstay Charge and care
15 must be taken to ensure they are set high enough to incent drivers to move their vehicle
16 but not so high as to discourage customers from using the stations. KCP&L set the
17 maximum of the range of Session Overstay Charge at \$6.00 per hour based on the
18 maximum rate of charge provided by the Level 3 charging station – the fastest charger.
19 The lost revenue potential of a Level 2 charge port is significantly less (approximately
20 \$1/hr.) and the Session Overstay Charge should reflect this differential. The Company
21 wants to establish the minimum number of Session Overstay Charges levels but
22 recognizes that higher overstay charges may be needed at some locations compared to
23 other.

1 **Q. What type of other notification can a driver receive?**

2 A: Notifications are available to make drivers aware of their EV charging status at all times.
3 Text and email notifications can be set up to notify drivers when their car is fully
4 charged, when charging is interrupted, when a session overstay grace period is ending,
5 and when EVCS become available for use.

6 **Q. How does ChargePoint collect charging fees from account holders?**

7 A. ChargePoint operates on a prepay credit system. The first time you use a ChargePoint
8 station with a fee, the driver will need to enter payment information. ChargePoint
9 charges the Account holder \$10 using their preferred payment method on file and deducts
10 the charging costs from it. Every time the account balance goes below \$5, ChargePoint
11 charges the account another \$10 using the payment method on file. If the driver cancels
12 their account, ChargePoint refunds the remainder of the balance to the account holder.

13 **Q. What has the Company done to increase the use of the CCN?**

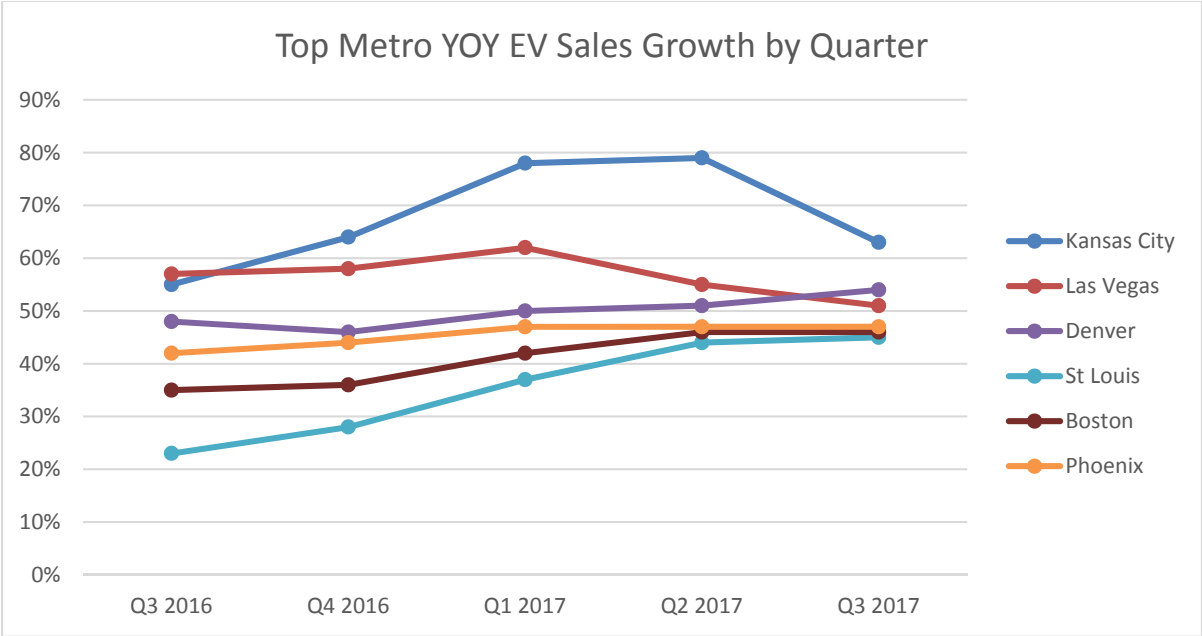
14 A. The Company has undertaken many community outreach and marketing activities related
15 to the CCN, including building an EV driver affinity group, outreach and training to local
16 car dealerships, partnership with Nissan, development of a multi-pronged advertising
17 approach, held EV events and built a customer microsite.

18 **Q. What has been the growth in the number of electric vehicles in the Kansas City
19 metro area?**

20 A. For four quarters in a row, Kansas City has led the nation in electric vehicle growth with
21 a 78 percent increase in the first quarter of 2017; 79% increase in second quarter 2017
22 and 63% increase in third quarter 2017 respectively as compared to 2016.² The graph

² Source: ChargePoint; Polk/IHS Markit Data 2017Q3

1 below illustrates this growth compared to other large cities in the United States. As
 2 shown in the graph, the Kansas City area has had an accelerated growth relative to other
 3 cities shown. It is reasonable to conclude that there is a direct correlation between the
 4 increased accessibility made possible by widespread placement of EV infrastructure
 5 through the CCN and the growth in adoption of electric vehicles.



6
 7 **Q. What has been the growth in the number of electric vehicles been in the KCP&L**
 8 **service territories?**

9 **A.** At the end of 2014, just prior to the launch of the Clean Charge Network, there were an
 10 estimated 805 plug-in electric vehicles (“PEVs”) in the KCP&L service territories. As of
 11 June 30, 2017, the number of registered EVs in all KCP&L jurisdictions had increased to
 12 over 2,400 PEVs, a compounded average annual growth rate of 44%.

13 In addition, the number of registered EVs in the Company’s service territories has
 14 grown faster than the cumulative new EV sales indicating that dealers are importing off-
 15 lease and trade-in EVs from other markets to Kansas City to meet the growing demand.

1 Another change in the electric vehicle market is the decreasing dominance of plug-in
2 hybrid electric vehicles (“PHEVs”) and the consumers increased willingness to invest in
3 battery electric vehicles (“BEVs”) with a limited driving range, typically below 80 miles.

4 The following table provides the breakdown by jurisdiction. Initially, PHEVs
5 made up 70 percent of PEVs, but now PHEVs represent 56 percent of PEVs and BEVs
6 have increased to 44 percent of all PEVs.

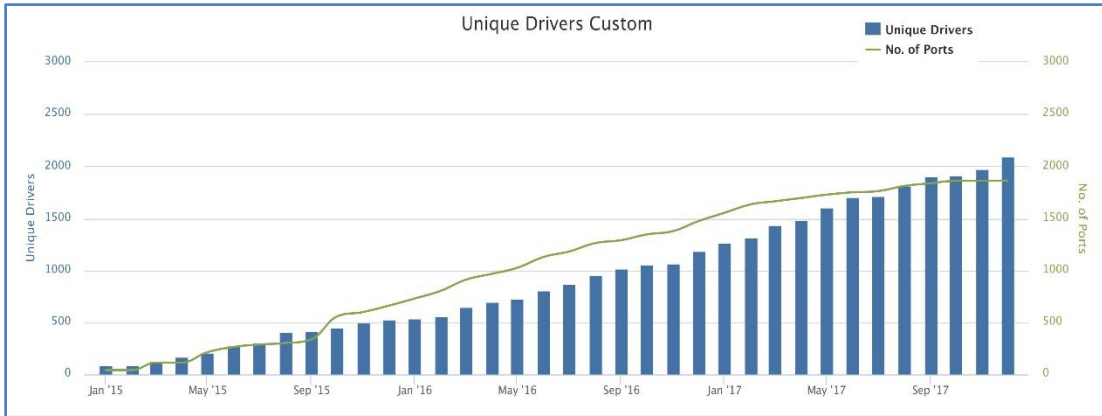
Jurisdiction	YE 2014	YE 2015	YE 2016	Q2 2017
KCP&L- GMO	139	195	304	386
KCP&L-MO	265	388	641	842
KCP&L-KS	401	556	909	1,176
Total	805	1,139	1,853	2,403

7
8 **Q. How were these estimates developed?**

9 A Under KCP&L’s participation in the Electric Power Research Institute’s (“EPRI”)
10 Transportation Electrification research program, KCP&L receives monthly report of the
11 number of vehicles registered by type for each Company jurisdiction. EPRI uses monthly
12 county level ‘new vehicle’ registration data and quarterly zip-plus4 vehicle registration
13 data to develop the vehicles in operation for each service territory.

14 **Q. What has been the growth in the number of electric vehicle drivers using the Clean**
15 **Charge Network?**

16 A. The number of unique EV drivers using the CCN has increased, as illustrated in the
17 following graph, from 86 in January 2015, to 2,092 as of December 2017, a compounded
18 average annual growth rate of 190%.



1

2 **Q. Are there additional metrics to illustrate the growth in the use of the Clean Charge**
 3 **Network?**

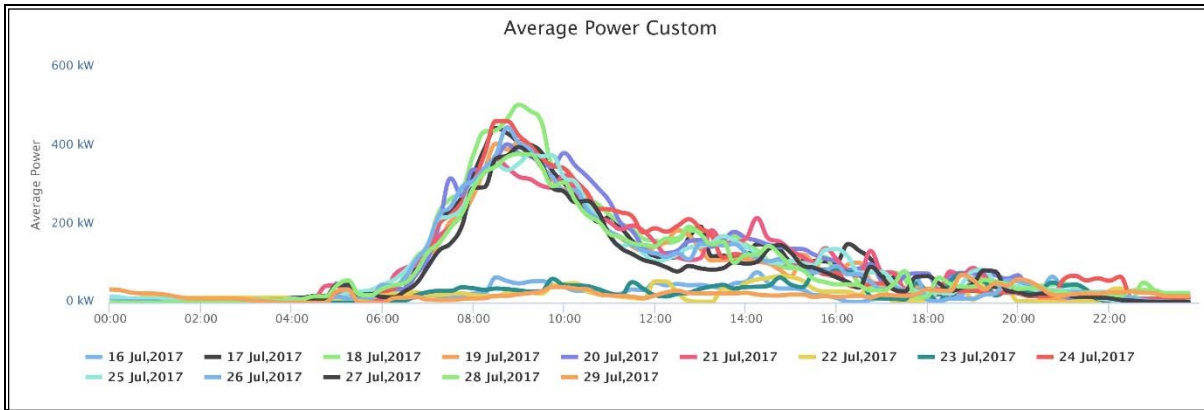
4 **A.** Yes, in addition to the number of unique drivers using the Clean Charge Network, the
 5 number of charge session and the energy dispensed are metrics that illustrate the growth
 6 in use of the Clean Charge Network. Over the same three (3) year period, the number of
 7 monthly charge sessions has grown steadily from 513 to 16,162 for a 216% compounded
 8 annual growth rate and the energy dispensed monthly has increased from 4,028 kWh to
 9 117,355 kWh (208% compounded annual growth rate)

10 **Q. What has the Company learned about driver charging patterns impact on the**
 11 **electric system?**

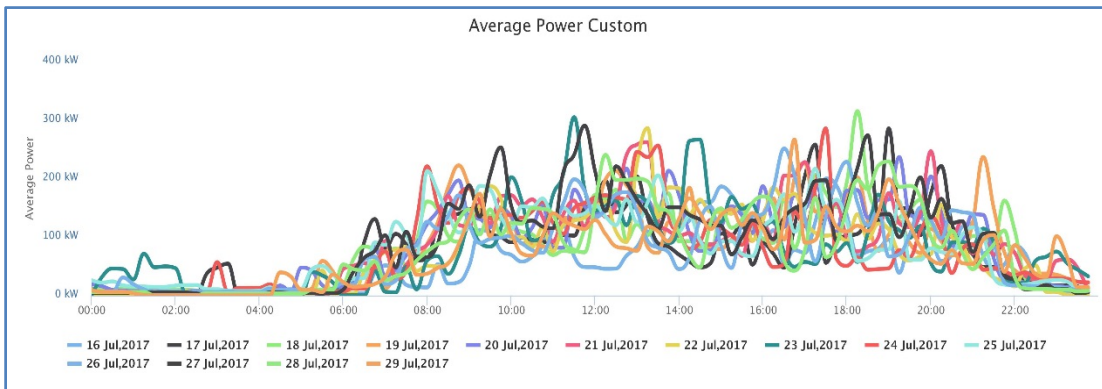
12 **A.** One of the objectives of the CCN was to gain a better understanding of EV driver
 13 charging patterns. As discussed previously EVCS have been installed at a wide variety
 14 of host site locations, but all host locations generally fall within three broad host
 15 classifications: 1) Workplace, 2) Retail/Public Venue, and 3) Multi-family.

16 Approximately 50 percent of the EVCS have been installed at locations that
 17 primarily support driver workplace charging. The following figure illustrates the
 18 aggregated daily charging pattern of workplace charging for the last two weeks in July

1 2017. The figure illustrates a very consistent weekday charging pattern that begins early
2 in the morning, reaches a peak by mid-morning, and is significantly reduced by noon.
3 This charging pattern is very complementary to both the system and commercial
4 distribution feeder load profiles.

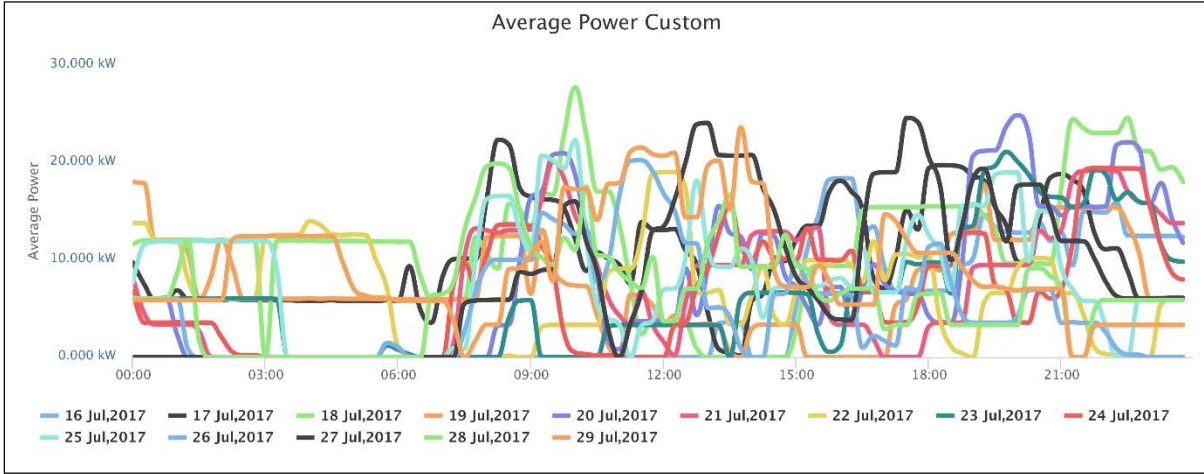


5
6 Approximately 42 percent of the EVCS have been installed at retail/public venues
7 locations that primarily support more transient or opportunistic driver charging. The
8 following figure illustrates the aggregated daily charging pattern of retail/public venue
9 charging for the last two weeks in July 2017. The figure illustrates a very random daily
10 charging pattern that begins in the morning and continues through the remainder of the
11 day. The figure illustrates some potential contribution to system peak during the 4-6 pm
12 hours.



13

1 Only 8 percent of the EVCS have been installed at multi-family locations to
2 primarily support apartment and condominium home charging. The following figure
3 illustrates the aggregated daily charging pattern of the multi-family locations for two
4 weeks in July 2017. The figure illustrates a very random daily charging pattern and very
5 little can be determined at this time due to the fact that many of the multi-family
6 installations are relatively recent and to date service very few drivers.



8 **Q. What are the benefits of the Clean Charge Network?**

9 A. Beneficial Electrification: EVs increase electricity sales during off-peak times.
10 Increased electricity sales help spread the costs of maintaining the grid over more
11 kilowatt-hours, helping keep rates competitive for all customers. Off-peak usage also
12 reduces the need for additional generation and grid upgrades to keep up with demand.

13 Environmental Benefits: EVs will reduce ozone-reducing pollutants and carbon
14 dioxide from tailpipe emissions thereby providing environmental benefits. Based on
15 2014 emissions data for the Southwest Power Pool (SPP), EV emissions are equivalent to
16 a 46 MPG³ conventional vehicle. This is lower than some gasoline powered vehicles, but

³ <http://blog.ucsusa.org/dave-reichmuth/new-numbers-are-in-and-evs-are-cleaner-than-ever>

1 is significantly above the 2017 model year vehicle average of 25.2 MPG⁴. The 46 MPG
2 equivalent rating, is an improvement of 10 MPG from just 5 years ago and reflects the
3 environmental controls and increased renewable generation in the SPP fleet. And since
4 2014, KCP&L's generation fleet has continued to reduce emissions as coal plants are
5 retired and more renewable generation resources are added.

6 Economic Benefits: A forward-thinking community attracts businesses and talent,
7 especially in competitive categories. EV owners spending less on fuel and maintenance
8 spend more money on other products, and often do so locally. In addition, there is
9 potential growth in the auto, EV, battery and charging industries within the Kansas City
10 region. As a result, there is direct and indirect job creation from charging station
11 deployment, EV sales and servicing.

12 Customer Programs: The KCP&L Clean Charge Network provides vital data that
13 helps us develop future new customer programs for DSM, time-of-use (TOU) rate, and
14 EV charge management and vehicle-to-grid battery storage/discharge.

15 **Q. How will GMO's non-EV driver customers most directly benefit from GMO's**
16 **investment in the Clean Charge Network.?**

17 A. All GMO customers will benefit from the increased electricity sales during off-peak
18 times from increased EV adoption. Increased electricity sales help spread the costs of
19 maintaining the grid over more kilowatt-hours, helping keep rates competitive for all
20 customers. Off-peak usage also reduces the need for additional generation and grid
21 upgrades to keep up with demand

⁴ http://www.umich.edu/~umtriswt/EDI_sales-weighted-mpg.html; accessed January 20, 2018

1 **Q. What is the Company's vision for the Clean Charge Network?**

2 A. The number of EVs in the country is growing each year at a faster and faster pace and
3 this trend is expected to continue. The environmental benefits of EVs, the support for the
4 industry by elected officials and policy makers, coupled with the decreasing costs of a
5 growing number of EVs and plug-in hybrid electric vehicles (PHEVs) on the market as
6 well as the economic savings to EV owners, all support a thriving industry over the next
7 decade.

8 However, the industry can only advance if there are adequate charging stations
9 throughout the country, similar to what we now have for gasoline-powered vehicles. The
10 lack of EVCS infrastructure presents a barrier to EV market penetration at scale in the
11 industry and the lack of a standardized financial transaction infrastructure also inhibits
12 the industry's growth. The CCN has helped alleviate this barrier in our service territory
13 and is providing KCP&L with data to better understand the charging needs and behaviors
14 of our EV driver customers.

15 The CCN is part of our strategy that focuses on testing and proving customer
16 programs via targeted projects and technologies that align with the philosophy of
17 empowering customers and optimizing the grid. By embracing a vision of the future that
18 chooses to think of integrating edge-of-grid resources as an opportunity, instead of a
19 threat, and customers as partners, instead of obstacles, we can optimize grid utilization
20 and continue to deliver affordable, clean, and reliable power for the long haul.

ONE CIS PROJECT

1
2 **Q: How will the customer portals change in the One CIS Project?**

3 A: As part of the One CIS project, KCP&L will replace all four of its online authenticated
4 customer portals. KCP&L will utilize Oracle Customer Self Service as a Web portal
5 platform that will give customers online options for paying bills, requesting service and
6 managing their account which includes monitoring their energy usage. The CSS project
7 is part of the broader One CIS initiative, and it focuses on enhancing the Customer Self-
8 Service experience while standardizing on a single technology platform. The CSS
9 environment currently uses multiple platforms to support the four different portals used
10 by the various KCP&L customers. The CSS project will enhance and replace each of the
11 four portals with a new version, sharing a common infrastructure, with the goal of
12 empowering the KCP&L and GMO customer base to fulfill their needs online, with zero-
13 to-minimal interaction with customer service representatives.

14 **Q: Why did the Company decide to replace all four online authenticated customer**
15 **portals?**

16 A: All four are tightly coupled with sending transactions and receiving information from the
17 CIS billing system. All four are interrelated and if one portal is replaced, all of the
18 portals must be replaced.

19 **Q: Could the existing portals be used with the Oracle CCB billing system?**

20 A: The foundational architecture for the existing portals was built using ColdFusion, a
21 programming language which is waning in popularity, now widely considered a legacy
22 method for web programming. It does not provide a foundation for new capabilities for

1 the Company's customer portals. More importantly, with the obsolescence of
2 ColdFusion, ColdFusion programmers are becoming more scarce

3 **Q: What limitations hindered keeping the current portal structure in place while**
4 **implementing CCB?**

5 A: The current architecture for the portals requires that all CIS billing data (both GMO and
6 legacy CIS) must be replicated into shadow databases on a nightly basis. These
7 databases are used for customer external access. It supports only limited real-time
8 customer data access of CIS billing information. Another primary concern would be the
9 ability for the portals to interact directly with CCB and process transactions real-time
10 (such as payment processing). The interaction into CCB would have to be accomplished
11 by creating a brand new "handshake" between the portals into a brand-new middleware
12 programming language that accepts a digital transaction from the portal and transmits it
13 to CCB. Given the uncertain future of ColdFusion as a viable platform for interactive
14 websites, it would not be prudent to invest the effort to rely on it as a primary tool for
15 critical interfaces to the new billing systems and the many associated systems involved in
16 the One CIS effort.

17 **Q: Did the Company buy a new software program to replace the portals?**

18 A: No, there is no viable off-the-shelf program available in the market place that can provide
19 the breadth of functionality and flexibility that our current websites give KCP&L
20 customers today. We had a guiding principle that we would not to take away current
21 functionality that our customers are using and enjoy. Thus, we decided to build the sites
22 using Sitecore platform.

23

1 **Q: What programming language was used?**

2 A: The primary coding language is Microsoft .Net. That's supplemented with other web
3 coding and scripting tools like HTML, HTML5, Javascript, CSS (Cascading Style Sheet,
4 not to be confused with Customer Self Service). Another software component is a CMS
5 (content management system) which is Sitecore, another .Net tool.

6 **Q: Why is a content management system necessary?**

7 A: Sitecore is a customer experience management company that provides web content
8 management and multichannel marketing automation software. The Sitecore software is
9 used on kcpl.com for our public company website. By using the same software, we can
10 leverage the same content to have a consistent look and feel across the public site through
11 to the authenticated portal site. We will be able to leverage our employee workforce to
12 provide content for both sites.

13 **Q: What are the components of the authenticated customer portals?**

14 A: The Company maintained the same set of four portals, My Account, AccountLink
15 Advantage, ApartmentLink and AgencyLink. These portals serve all our residential,
16 commercial, Tier 1 and Tier 2 customers. Additionally, they service property
17 management companies and landlords. Finally, we provide a portal for social service
18 agencies that support our customers needing energy assistance.

19 **Q: What was the final components of the portals?**

20 A: At its core, the CSS portals rely on three layers:

- 21 • User Interface: The UI is based on Sitecore and it's needed to interact with the user and
22 the exposing of various functionalities. The UI layer relies on several services to properly
23 render the required functionality.

- 1 • Integration Layer: A service layer responsible for relaying information back and forth,
2 from the UI to the OUAF family of applications. The integration layer also serves as a
3 bridge to all integrations with 3rd party services.
- 4 • OUAF Core services: The OUAF (Oracle Utilities Application Framework) layer is made
5 up of CCB, as the core billing platform integrated with MDM and OMS to support all
6 meter and network functionalities. These together, along with enterprise business
7 services, act as the hub of the CSS architecture.

8 **Q Did the Company have a goal in mind for scope of functionality for the customer**
9 **portals?**

10 A: We had a team of analysts that documented every functional requirement in our customer
11 portals. Each requirement was used as the foundational requirement in the RFP's that
12 were sent to qualified vendors. Each requirement was tracked in a Requirements
13 Traceability Matrix (RTM) to ensure the functionality was part of the delivered scope of
14 the new portals. The requirements went through an evaluation process to determine
15 customer benefit, efficiency and usability, and based on that the original scope of the
16 project was established and estimated. Any new requirement will be required to go
17 through the same rigorous vetting process before it can affect the project scope. Once the
18 scope is fully accepted, a change request (CR) will be required to support any additional
19 work.

20 **Q: How did KCP&L determine the scope of functionality for the customer portals?**

21 A: Our baseline for the new portals was to recreate current functionality. Exceptions to this
22 rule were additional functionality provided by tight integration with CCB (such as Budget
23 Billing enrollment, payment plans and real-time payments) and features enabled by other

1 project integrations (for example, detailed energy data from interface with MDM). Other
2 guiding principles included providing equivalent features across both divisions (GMO
3 and KCP&L) and ensuring the website is fully responsive and optimized across devices
4 (pc, laptop, tablet, mobile device), operating system (Windows, iOS, Android) and
5 browsers (Internet Explorer, Chrome, Safari).

6 **Q: How can you be sure your investment will yield a platform for the future of**
7 **customer self service enhancements?**

8 A: We believe the .Net platform and Sitecore content management system is a sound
9 platform and will provide years of growth and customer benefits. These platforms have
10 an abundant workforce in the metro area to hire directly or to work with 3rd party vendors
11 to provide resources. Finally, since this is a popular platform this will support expanding
12 our services to our customers as we work with 3rd party vendors to offer customer
13 programs.

14 **Q: Did you use any KCP&L employees to design and implement the new portals?**

15 A: We simply did not have the number of resources that were needed to rebuild these
16 portals. We are staffed with resources to support our operations and controlled upgrades
17 to the portal. A complete overhaul, such as the One CIS project, required outside
18 resources to accomplish this in the project timeframe.

19 **Q: What was the project timeframe?**

20 A: The project timeframe is discussed in the Direct Testimony of Forrest Archibald.

21 **Q: Who did you choose as your partner to write the software?**

22 A: Through the RFP processes we found 3 viable candidates. They were PWC, Oracle and
23 DEG. DEG is a local company and they are a long-term partner with KCP&L working

1 with us on the public .com website. DEG, a low-cost bidder, was the likely and preferred
2 source (because of their proximity and ability to support the portals long-term) to do this
3 work. However, DEG's lack of knowledge about CCB and the middleware connection to
4 CCB made it a challenge for them to bid the entire project. DEG bid was for the front-
5 end customer facing functionality. Between Oracle and PWC, we chose PWC and the
6 middleware and backend integrator for the portals. This was the likely choice because
7 they were the system integrator for CCB. They had all the knowledge about the new
8 processes and had all the knowledge about the implementation methodology and
9 timelines. While working with two different vendors provided a unique challenge for
10 governance, the partnership with DEG, PWC and KCP&L provide to be the best choice.

11 **Q: Did KCP&L employees participate in the development of the portal?**

12 A: Yes, the portal component of the project was called CSS. This stands for Customer Self
13 Service. KCP&L had a CSS project lead, CSS IT technical lead, CSS business lead and a
14 CSS testing resources throughout various stages of testing. The project team also used
15 resources from the Customer Experience and Marketing Communications team to
16 provide oversight to the content and look and feel of the portals. The CSS business lead
17 has been the manager of the existing authenticated portals for 20 years. We were guided
18 by our business stakeholder, Sr. Director Customer Experience and Marketing
19 Communications throughout the entire construct, implement, operate and review process.

20 **Q: How did the development approach connect to the One CIS project and CCB**
21 **functionality?**

22 A: The CSS development approach mirrored the One CIS approach, with some minor
23 changes to account for the heavy dependency on service integration to render key

1 functionalities. The development phase required the collaboration of three separate
2 vendors, who are each responsible for producing clean, tested, and executable code—a
3 code base which is integrated, based on a common methodology.

4 **Q: How can you be sure they will function properly when you go live and your**
5 **customers will not experience any downtime?**

6 A: KCP&L chose another vendor, Veracity, to lead our testing efforts. They could provide
7 local resources as well as an experienced testing lead. Veracity as also an independent
8 partner from DEG and PWC and could provide oversight guidance to our CSS leads. Part
9 of the scope for PWC, DEG, Veracity and KCP&L was to develop test cases that aligned
10 with each of the requirements. We had more than 7,000 test cases. Often these were
11 tested over and over during the various testing phases of the project. These test cases
12 spanned several internet browsers and hardware.

13 **Q: What other testing strategies ensured the functionality?**

14 A: The CSS testing strategy is dependent on the overall One CIS testing strategy--and
15 follows the same methodology and schedule. We had different environment to test the
16 software in. The environments spanned from development, System Integration Testing
17 (SIT) environment and User Acceptance Testing (UAT) environment. The UAT
18 environment was built on production servers and operating systems. Code delivery
19 migrated through all environments. Other quality assurance methods included nightly
20 triage for defects in the CSS portals. Morning triage meeting spanned the overall One
21 CIS project team which included all products such as CCB, MDM, CRM/MAP and CSS.
22 Testing metrics such as number of defects and estimated fix dates were monitored by
23 project team leads, PMO and QA leads.

1 **Q: Did you have a goal in mind for customer service metrics for the customer portals?**

2 A: Customer Service Metrics: These are standard metrics that the industry uses to measure
3 and benchmark how utilities interact and transact business with customers. This includes
4 measuring and working to see improvements in our electronic portals. Our goal is to be
5 top quartile among utilities nationwide and to see continual improvement in these metrics
6 as well as continual streamlining in our customer processes. This is an ongoing process.
7 We use Foresee to help maximize the customer experience on our online / digital
8 platforms.

9 **Q: Can you describe KCP&L's efforts around its online presence with electronic**
10 **transactions. How does this impact customer experience?**

11 A: KCP&L was an early adopter of electronic portals and has seen the importance of a
12 strong digital platform for more than a decade. As stated previously, all customers are
13 different. Some customers prefer talking to a representative on the telephone and paying
14 their bill through the mail. However, a growing segment of customers prefers to find
15 information on the internet and to conduct business online. To accommodate those
16 customers, KCP&L has had a robust digital and online strategy for nearly a decade. Our
17 focus here is to provide online and mobile solutions that work for our customers.

18 Currently, KCP&L has a mobile-optimized website as well as highly-utilized
19 authenticated electronic transaction portal called MyAccount. As of the end of 2015,
20 more than 55% of KCP&L's customer transactions now occur on online sessions. And
21 KCP&L's customer satisfaction with these portals is industry leading.

1 **Q: How does KCP&L approach customer service with business customers?**

2 A: A separate team of employees works with business customers. Typically, business
3 customers have more complex requirements than residential customers. Their bills are
4 generally more complex. Business customers often have higher voltage service, more
5 complex bills with multiple accounts associated with one customer as well as various
6 adjustments to their tariffed rates, such as an economic development rider. To serve the
7 digital customer we have a separate portal called, AccountLink Advantage (known as
8 ALA). This is reserved for Tier 1 and Tier 2 customers to interact by viewing their
9 energy usage, paying their bills, consolidating information across a customer's business
10 and multiple accounts and overall managing their accounts.

11 **Q: How does implementing the new portals during this timeframe leverage the Oracle
12 CCB product?**

13 A: When it comes to our business customers (ALA) our customers cannot set up/modify
14 banking data directly. The other big strategic win for our ALA customers is the ability to
15 be able to view interval data. Our sophisticated business customers want to be able to
16 manage their energy and understand when and how their energy is being used. The new
17 portals unlock the potential the AMI/MDM systems for both residential and commercial
18 customers by being able to access this data at various levels (yearly, monthly, hourly and
19 15 minute intervals). This data is displayed graphically and can be downloaded for
20 further analysis. Both our residential and commercial customers will enjoy the same
21 functionality across our service territory. Today some limitations exist for the GMO
22 customers.

1 **Q: Are there additional ways KCP&L has improved their customer experience because**
2 **of the new portals?**

3 A: Yes. Customer expectations continue to evolve and to increase. Customers do not judge
4 their utility's customer service relative to other electric utilities across the country.
5 Rather, customers compare their electric utility to other companies they do business with
6 every day, like their bank or their credit card company. These types of companies – and
7 others the Company is compared to like Amazon and Wal-Mart – provide customers
8 smooth online experiences that allows them to quickly and easily conduct their business
9 then move on. The new portals bring the Company in line with what customers expect to
10 experience when they come online to start service, pay their bill or better understand their
11 energy usage and costs. Customers also expect to be able to tell the Company how they'd
12 like to be kept up-to-date with their account, through messages like paperless billing
13 notifications, bill reminders and more. And they expect to be able to receive those
14 messages via email, text message or both, depending on their preferences. With the new
15 portals, the Company has created a preference center and expanded the number of
16 notifications customers can receive.

17 **Q: What types of communications preferences can customers set within Customer Self-**
18 **Service, why is that important and how does it benefit customers?**

19 A: The Company wants to offer customers appealing options and control over what
20 information they receive, how and when. This increases customer satisfaction.

21 With the new Customer Self-Service, the Company provides nine different overall
22 options for telling the Company how they'd like to be communicated with. These options
23 allow them to select the types of information they want to receive and indicate which

1 channel they prefer – email or text message. Customers also can opt out of
2 communications, if they wish.

3 One of the business requirements the team specified for this functionality is the
4 ability to store and manage customer preferences in a way they can efficiently and
5 effectively be utilized across the organization, allowing the Company to serve customers
6 better in every channel. For example, customers can speak with a Customer Service
7 Representative over the phone to change their preferences and they can select preferences
8 themselves through the online portal. Both interactions will work seamlessly for the
9 customer because of the systems selected to manage this interaction.

10 **Q: What systems were selected to manage customer communication preferences?**

11 A: Several systems working together provide customers appealing options and control over
12 what information they receive, how and when. These systems also orchestrate the
13 delivery of the more than 13 million messages that are delivered annually as a result of
14 these customer requests.

15 Customer Self-Service (CSS) provides the preference selection capability to
16 customers online. Customer Care & Billing (CC&B) stores these preferences, ensuring
17 they are up-to-date, tied to the appropriate accounts and visible to Customer Service
18 Representatives. Oracle Eloqua is a system that creates and stores the templates for all the
19 message types and variations, receives triggers from CC&B and delivers the appropriate
20 messages to individual customers via email and text message. Eloqua also ensures
21 compliance with applicable regulations, such as the CAN-SPAM law, and reports back to
22 CC&B text message payments, message delivery confirmations and updates to customer
23 preference information, such as email opt-outs.

1 **Q: What improvements have you made to the types of account notifications customers**
2 **receive because of their completion of a task on a Customer Self-Service portal?**

3 A: Currently, the Company offers a smaller set of more basic transactional notifications for
4 customers through email and text messages. For example, when a customer pays their bill
5 online through the current Customer Self-Service portal, they receive a confirmation
6 email letting them know their payment was submitted. Several improvements are being
7 made to these notifications.

8 First, the Company will now offer more of these notification options. J.D. Power
9 and Associates indicates that the more account notifications customers have available to
10 them, the higher their satisfaction. The Company's current offering includes 26
11 notification types with 81 variations of those messages, depending on transaction details
12 and customer type. With this initial go-live of the redesigned Customer Self-Service
13 portals and Eloqua, the offering increases to 42 notification types with 238 variations
14 accommodating transaction details and customer type. Seventy-two of the variations are
15 enhancing existing notification types by adding additional personalization not available in
16 the current state offering.

17 Second, the Company is adding more functionality to its text messaging account
18 management offering. Currently, KCP&L's text messaging offering allows customers to
19 receive billing alerts via text message and to pay their bill via text. KCP&L was among
20 the first five regulated investor-owned utilities to offer this type of service to residential
21 customers in 2011. Based on customer feedback and continued learning around industry
22 best practices, the text messaging program is being expanded to offer several new
23 features.

1 First, several new notification types are being offered around payments and due
2 dates. In terms of payments, the Company has added a scheduled payment cancellation
3 notification, a confirmation of enrollment into a payment plan, and a “last payment”
4 feature that allows enrolled customers to text keyword LAST to view the date and
5 amount of their last payment made. There are now also five variations of text
6 notifications for payment failures, depending on the details of why a payment has failed.
7 In terms of due dates and reminders, the Company has added a bill overdue notification
8 and a payment plan due notification.

9 Second, the Company is offering customers enrolled in the text messaging
10 account management program the ability to avoid pending disconnection by texting the
11 keyword MIN. This will automatically pay the minimum amount due to avoid
12 disconnection in real time.

13 The Company also has added the ability for a user to manage multiple accounts
14 through one phone number in the text messaging program. Previously, there could only
15 be one account per phone number. This is a vast improvement to the user experience for
16 customers who have multiple accounts.

17 **Q: Why is it important that the Company have a system like Oracle Eloqua to deliver**
18 **email and text messages?**

19 **A:** With Eloqua, the Company has a reliable, sustainable message orchestration and
20 distribution platform that can be scaled to grow and evolve with the needs of customers.
21 The Company’s current delivery mechanisms for transactional emails and text messages
22 were built upon legacy ColdFusion applications. Those applications are not compatible
23 with Oracle Customer Care and Billing and would not have been sustainable for that

1 reason and because ColdFusion is a dying computer programming language few
2 developers can support. Therefore, a new system was required to deliver these messages.
3 This new system — Oracle Eloqua — provides a platform for the Company to deliver
4 email and text messages in a way that is highly reliable, automated and significantly
5 easier to maintain. Creating such a platform was essential for the Company to be able to
6 increase the number and types of notifications offered to customers now and in the future.
7 It will allow the Company to encourage even more customers to transact with the
8 Company online, should that meet their preference, and it will ensure there is a solid
9 fountain for additional options to be added in the future more easily than with legacy
10 systems.

11 **Q: Are there other ways the Company will improve customer experience using Oracle**
12 **Eloqua?**

13 A: Yes. Oracle Eloqua is a type of software called a marketing automation platform, which
14 means it has robust capabilities to deliver the right message to the right customer at the
15 right time.

16 This capability is essential because customers want to hear from their utility in
17 helpful, relevant ways. They're comparing their utility to companies like Amazon, Wal-
18 Mart, their banks and mobile phone providers that offer standout customer experiences
19 not yet widely found in the electric utility industry. The Company has an opportunity to
20 measure up because they want to learn about electricity-related topics, such as energy
21 efficiency, from someone they trust in that space – their utility.

22 What specifically do customers want to hear? They want to know about the
23 Company's plans for reliable, sustainable energy delivery. They want notifications when

1 their bills are due. They want alerts when payment has been received. They want to know
2 how severe weather might impact their service – and how to stay safe during that event.
3 They want information about programs and services that help them save money. They
4 want the tools that help them make informed decisions about their energy usage.

5 But customers don't want that information randomly – or all at once. Every
6 customer doesn't want that information delivered the same way. And they want to
7 manage the depth and nature of their relationship with their utility.

8 To meet customer expectations, the Company will deliver the information
9 customers want along three dimensions: content type, audience and timeliness.

10 First, there are the types of content the Company will deliver. There are four
11 broad categories:

- 12 • Account status (e.g., bills due, payment received, enrollment in automatic
13 payments)
- 14 • Critical events (e.g., impending severe weather, emergence of scams)
- 15 • Educational content (e.g., variety of rate plans available, safety tips,
16 energy-saving best practices)
- 17 • Marketing content (e.g., availability of energy-efficiency rebates and
18 programs, availability of community solar and other renewables offerings)

19 Second, there is the type of customer or audience who will receive the information.
20 These systems allow the Company to target and nuance information for specific customer
21 segments, so the messages they receive are personalized and apply to them specifically.
22 This is determined by such attributes as:

- 1 • Customer type (business vs. residential) – The information business
2 customers expect from differs from what residential customers expect.
3 Further, not all programs and account options are available to both
4 customer groups.
- 5 • Geography – The Company covers a large geography. Scams and weather
6 events don't impact everyone. Rate jurisdictions and applicable rates vary.
7 What is relevant to people living in St. Joseph, Mo., is not always relevant
8 to businesses in Sedalia, Mo.
- 9 • Communities – Suburban, rural and urban customers do not always need
10 or desire the same information at the same level of depth or tone.
- 11 • Additional demographics – Whether people rent an apartment or own a
12 home, whether they are a new or long-time customer, whether they prefer
13 to interact with the Company digitally, over the phone or in person –
14 different customer needs and behaviors manifest themselves in these.

15 The third dimension along which the Company will deliver information customers
16 want, is timeliness. Eloqua can send information to customers timed to coincide with
17 actions they've taken or experiences they've had with the Company. Did they recently
18 start service? Are they facing a high bill? Have they investigated a rebate program but not
19 followed through? Were they looking for information on the Company's website, but
20 appear, based on click behavior, not to have found it?

21 In each of those circumstances (and many others), the Company has conducted
22 research that indicates what customers expect to hear in that moment and what messages
23 they want to hear. A customer who just started service is responsive to information about

1 how to sign up for My Account access, if they didn't already, what to expect with their
2 first bill, and other tips that are helpful during the time of settling into a new home. A
3 customer facing an unexpectedly high energy bill, for example, will be much more
4 interested in tips, tools and programs to help them manage their energy usage – as
5 opposed to learning about electrical safety tips.

6 **Q: Does Eloqua achieve these customer experience benefits by itself or are there other**
7 **systems it is connected to?**

8 A: No. First, Eloqua also has a direct integration with Customer Care and Billing (CC&B)
9 that allows it to send transactional notifications to the right customers, at the right time in
10 the right communications channel. I described this earlier in my testimony.

11 Eloqua is also supported by a CRM, or customer relationship management
12 system. As part of this initiative, the Company also implemented a CRM called Oracle
13 Sales Cloud. This is standard practice. Companies that have marketing automation
14 platforms like Eloqua also have CRMs like Oracle Sales Cloud. And, the Company is
15 leveraging the standard, out-of-the-box integration between these two specific systems.

16 **Q: What does a CRM like Oracle Sales Cloud do and what customer benefits does it**
17 **generate?**

18 A: Oracle Sales Cloud helps the Company create more personalized customer interactions
19 by centralizing the data that informs those interactions. Eloqua is the engine that delivers
20 interaction; Sales Cloud is the fuel.

21 To meet customer expectations by delivering information they want along the
22 three dimensions I discussed earlier – content type, audience and timeliness – various

1 pieces of data are required. These data are generated from multiple systems and processes
2 across the company.

3 For example, the Company currently distributes what's known as a Welcome
4 Series – a series of 5 emails spaced roughly 30 days apart over 120 days. These series of
5 emails are becoming more commonplace in the utility industry because they make
6 customers aware of options and programs available to them for their new account, which
7 increases their satisfaction. The current Welcome Series is basic, due to the limitations of
8 the legacy systems for distributing messages and the lack of centralization of data that
9 would allow the messages to be more personalized. Opportunities to be more helpful to
10 customers are left unaddressed because of these limitations. Going forward, the Company
11 will be able to deliver a more customized, personalized Welcome Series to customers.

12 From a marketing perspective, the combination of Eloqua and Sales Cloud will
13 allow the Company to scale its marketing efforts that have proven ability to reach
14 customers, engage them, secure their participation in energy efficiency programs and
15 increase their satisfaction. The Company spent several years proving the case for more
16 targeted marketing communications by creating smaller, one-time outreach campaigns
17 with manual effort. However, these efforts have not been able to be achieved at scale
18 because of the lack of automation, resulting in manual matching and merging of data
19 sources that has been necessary to achieve this. What used to take several weeks of
20 multiple staff people's time to create, can be created in less than one day using Eloqua
21 and Sales Cloud.

22 But this is just the first step. The information gathered by these systems will allow
23 the Company to synthesize customer data, to test various scenarios, refine the messaging

1 and approach, and meet evolving customer expectations. What customers want from their
2 utility will change over time. Based on what will be learned about customers and their
3 behaviors, the Company can meet those expectations more effectively.

4 **Q: Are there other benefits Oracle Sales Cloud provides?**

5 A: Yes. Another capability of CRM systems like Oracle Sales Cloud is that they provide a
6 platform to track and plan face-to-face and other offline interactions with multiple
7 contacts associated with a customer account, which is particularly important and
8 applicable to large business customers, including cities and municipalities. This is
9 important because Customer Care and Billing (CC&B) is a system that tracks only the
10 billing contacts for customer accounts. Because its critical functions are facilitating
11 traditional residential call center interactions and billing, it is not optimized to store
12 ancillary but important information about those customers, such as demographics and
13 digital interaction histories. It's also not optimized to track additional account contacts
14 such as facility managers who, in the case of large customers, don't process and pay the
15 bill, but do manage their facilities and make service and energy efficiency decisions.

16 Energy Consultants and Community Managers on my team are responsible for
17 interfacing with these contacts day-to-day. They need a centralized platform to capture,
18 store and update contact information for individuals CC&B considers ancillary, and the
19 ability to track their interactions with these individuals so a better customer experience
20 can be delivered. The Sales Cloud platform enables this information to be shared and
21 leveraged within my team, but importantly, it also provides a way this information can be
22 shared more broadly across the Company – such as with the traditional call center --
23 when the Company decides it is ready to enable that functionality.

1 **Q: Why did the Company decide to take on these customer experience projects now,**
2 **alongside the Customer Care & Billing (CC&B), Customer Self-Service (CSS) and**
3 **Meter Data Management (MDM) implementations?**

4 A: There are two reasons.

5 First, as I explained earlier, the Company's current delivery mechanisms for
6 transactional emails and text messages were built upon legacy ColdFusion applications.
7 Those applications are not compatible with Oracle Customer Care and Billing (CC&B) or
8 Customer Self-Service (CSS). A replacement structure for sending transactional emails
9 and texts had to be identified and implemented. The Company chose to meet this
10 requirement with a set of systems that unlock additional value and benefit for customers.

11 Had the Company waited for a future timeframe, two undesirable situations would
12 have been created. First, the customer benefits that will be realized now would have been
13 delayed years into the future. Second, the development and data integration work
14 required to implement Eloqua and Sales Cloud would have been greater after a completed
15 CC&B and CSS than it is now. This is because when a company is installing business-
16 critical, enterprise systems that makeover major swaths of business process and
17 operational functions, a unique window of opportunity for efficiency is available to create
18 integrations with other systems, such as Eloqua and Sales Cloud. In other words, if
19 you're renovating a house and you already have the walls open to replace your electrical
20 and plumbing, you're also going to stub the additional bathroom you've needed at the
21 same time, instead of later re-opening the walls again. The bathroom is stubbed and it can
22 be further built out during the coming months and years.

1 Q: Does that conclude your testimony?

2 A: Yes, it does.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of KCP&L Greater Missouri)
Operations Company's Request for Authority to) Case No. ER-2018-0146
Implement A General Rate Increase for Electric)
Service)

AFFIDAVIT OF CHARLES A. CAISLEY


STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Charles A. Caisley, being first duly sworn on his oath, states:

1. My name is Charles A. Caisley. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Vice President – Marketing and Public Affairs.

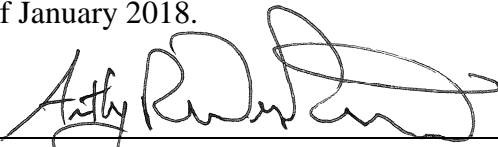
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of KCP&L Greater Missouri Operations Company consisting of thirty-seven (37) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.



Charles A. Caisley

Subscribed and sworn before me this 29th day of January 2018.



Notary Public

My commission expires: 4/26/2021

