

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

In the Matter of the Application of )  
Great Plains Energy Incorporated for )  
Approval of its Merger with ) File No. EM-2018-0012  
Westar Energy, Inc. )

**JOINT LIST OF ISSUES, LIST AND ORDER OF WITNESSES, ORDER OF CROSS-  
EXAMINATION AND OPENING STATEMENTS**

COME NOW Great Plains Energy Incorporated (“GPE”); Westar Energy, Inc., (collectively with its subsidiary Kansas Gas and Electric Company, “Westar”); Kansas City Power & Light Company (“KCP&L”); KCP&L Greater Missouri Operations Company (“GMO”) (GPE, Westar, KCP&L and GMO are collectively referred to herein as “Applicants”), Staff of the Missouri Public Service Commission (“Staff”); Office of the Public Counsel (“OPC”); Missouri Department of Economic Development - Division of Energy; (“MDED”); Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”); Sierra Club (“SC”); Natural Resources Defense Council (“NRDC”); Consumers Council of Missouri (“CCM”); Brightergy, LLC (“Brightergy”); City of Independence, Missouri (“Independence”); Kansas Electric Power Cooperative, Inc. (“KEPCo”); Missouri Joint Municipal Electric Utility Commission (“MJMEUC”); Missouri Industrial Energy Consumers (“MIEC”); Midwest Energy Consumers Group (“MECG”); and Federal Executive Agencies (“FEA”), and hereby offer their Joint List of Issues, List and Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements.

### **JOINT LIST OF ISSUES:**

- I. Should the Commission find that GPE's merger with Westar is not detrimental to the public interest, and approve the merger?
- II. Should the Commission condition its approval of GPE's merger with Westar and, if so, how?
- III. Should the Commission grant the limited request for variance of the affiliate transaction rule requested by Applicants?
- IV. How should the bill credits proposed by Applicants be allocated between and within the various KCP&L and GMO rate classes?

### **OPENING STATEMENTS:**

- Applicants
- Staff
- Brightergy
- MJMEUC
- OPC
- MDED
- CCM
- KEPCo
- Independence
- MECG
- MIEC
- Renew Missouri
- Sierra Club
- NRDC
- FEA

**ORDER OF WITNESSES:**

**APPLICANTS**

- Terry Bassham/Mark Ruelle (appearing together as a panel)
- John Reed
- Anthony Somma
- Kevin Bryant (by telephone<sup>1</sup>)
- Greg Greenwood
- Darrin Ives
- Melissa Hardesty
- Bruce Akin
- Steve Busser
- Burton Crawford

**STAFF**

- Natelle Dietrich

**OPC**

- Geoff Marke

**MDED**

- Martin R. Hyman

**MECG**

- Michael L. Brosch
- Steve W. Chriss

**Renew Missouri**

- Karl R. Rábago (March 14<sup>2</sup>)

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<sup>1</sup> After the KCC issued its order rejecting the Initial Transaction on April 19, 2017, and before the announcement of the Revised Merger on July 9, 2017, Mr. Bryant scheduled a trip to attend a soccer tournament in which his son's team will be playing. No witness filed rebuttal testimony regarding Mr. Bryant's Direct Testimony and no Surrebuttal Testimony of Mr. Bryant was filed. In light of this, Applicants respectfully request the indulgence of the Commission and the parties to permit Mr. Bryant to be cross-examined by telephone in the event that cross-examination of Mr. Bryant is not waived altogether.

<sup>2</sup> To facilitate Mr. Rábago's travel schedule, the parties have agreed that Mr. Rábago will be subject to cross-examination on March 14 even if it requires taking him out of the prescribed order of witnesses.

**ORDER OF CROSS-EXAMINATION:**

- **Applicant Witnesses**

Staff, MJMEUC, Brightergy, OPC, DE, CCM, Renew Missouri, Sierra Club, NRDC, FEA, Independence, KEPCo, MIEC, MECG

- **Staff Witnesses**

Applicants, MJMEUC, Brightergy, OPC, DE, CCM, Renew Missouri, Sierra Club, NRDC, FEA, Independence, KEPCo, MIEC, MECG

- **OPC Witness**

DE, CCM, Renew Missouri, Sierra Club, NRDC, FEA, Independence, KEPCo, MIEC, MECG, Brightergy, MJMEUC, Staff, Applicants

- **MECG Witnesses**

OPC, DE, CCM, Renew Missouri, Sierra Club, NRDC, FEA, Independence, KEPCo, MIEC, Brightergy, MJMEUC, Staff, Applicants

- **MDED Witness**

OPC, CCM, Renew Missouri, Sierra Club, NRDC, FEA, Independence, KEPCo, MIEC, MECG, Brightergy, MJMEUC, Staff, Applicants

- **Renew Missouri Witness**

OPC, DE, CCM, Sierra Club, NRDC, FEA, Independence, KEPCo, MIEC, MECG, Brightergy, MJMEUC, Staff, Applicants

**WHEREFORE**, on behalf of the parties<sup>3</sup>, Applicants submit this Joint List of Issues, List and Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements.

Respectfully submitted,

*/s/ Robert J. Hack*

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**Counsel for Great Plains Energy Incorporated,  
Kansas City Power & Light Company, and  
KCP&L Greater Missouri Operations Company**

*/s/ Martin J. Bregman*

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**Attorney for Westar Energy, Inc.**

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<sup>3</sup> Applicants distributed drafts of this filing to all the parties and the following parties have indicated their assent to its contents: Staff, MJMEUC, MECG, MDED, Renew Missouri, FEA, SC/NRDC, Independence, MJMEUC, KEPCo and MIEC. Applicants received no response from the other parties.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was served upon all counsel of record on this 28<sup>th</sup> day of February, 2018, by either e-mail or U.S. Mail, postage prepaid.

*/s/ Robert J. Hack*

Robert J. Hack