

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

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

**MOTION FOR APPROVAL TO  
PRESENT CERTAIN WITNESSES AS A PANEL**

COME NOW Great Plains Energy Incorporated (“Great Plains Energy” or “GPE”), Kansas City Power & Light Company (“KCP&L”), KCP&L Greater Missouri Operations Company (“GMO”), and Westar Energy, Inc. (“Westar”)(all parties collectively referred to herein as “Applicants”), pursuant to 4 CSR 240-2.110(4), and file this Motion requesting an Order from the Missouri Public Service Commission (“Commission”) allowing Applicants to present two witnesses at hearing as a panel. In support thereof, Applicants state as follows:

1. Concurrent with the filing of this Motion, Applicants have filed an Application seeking approval of the merger of Westar and Great Plains Energy. Included with the Application is the direct testimony of supporting witnesses from the Applicants. The direct testimonies of Mr. Mark Ruelle and Mr. Terry Bassham are filed separately, although because they negotiated the Amended Merger Agreement and will be responsible for the success of the Merger, they address similar topics from the perspective of the companies they currently lead.

2. Subject to the Commission’s approval, Applicants propose to present Mr. Ruelle and Mr. Bassham together at hearing for cross-examination as a panel rather than as individual witnesses. Applicants believe this approach is more efficient as it will allow the Commission and the parties to present their questions to both witnesses so that the witness best suited can provide the answer, or both witnesses can answer if appropriate, or the party presenting the question can designate which witness the party wants to have answer a particular cross-examination question.

3. Since this method of presenting witnesses at hearing is not standard practice at the Commission, Applicants request the Commission determine in advance of the prehearing conference

(not yet scheduled) whether such approach is acceptable and issue an Order advising the parties as to whether this approach will be adopted for hearing.

WHEREFORE, for the reasons set forth above, Applicants request the Commission grant this Motion and issue an Order approving their request to present two of their witnesses, Mr. Ruelle and Mr. Bassham, as a panel at hearing.

Respectfully submitted,

*/s/ Robert J. Hack*

Robert J. Hack, MBN 36496  
Roger W. Steiner, MBN 39586  
Kansas City Power & Light Company  
1200 Main Street, 19th Floor  
Kansas City, MO 64105  
Telephone: (816) 556-2314  
Facsimile: (816) 556-2110  
E-Mail: [Rob.Hack@kcpl.com](mailto:Rob.Hack@kcpl.com)  
[Roger.Steiner@kcpl.com](mailto:Roger.Steiner@kcpl.com)

James M. Fischer, MBN 27543  
Larry W. Dority, MBN 25617  
Fischer & Dority, P.C.  
101 Madison Street, Suite 400  
Jefferson City, MO 65101  
Telephone: (573) 636-6758  
Facsimile: (573) 636-0383  
E-Mail: [jfischerpc@aol.com](mailto:jfischerpc@aol.com)  
[lwdority@sprintmail.com](mailto:lwdority@sprintmail.com)

Karl Zobrist, MBN 28325  
Dentons US LLP  
4520 Main Street, Suite 1100  
Kansas City, MO 64111  
Telephone: (816)460-2400  
Facsimile: (816)531-7545  
E-Mail: [karl.zobrist@dentons.com](mailto:karl.zobrist@dentons.com)

**ATTORNEYS FOR GREAT PLAINS ENERGY INCORPORATED, KANSAS CITY POWER & LIGHT COMPANY, AND KCP&L GREATER MISSOURI OPERATIONS COMPANY**

*/s/ Martin J. Bregman*

Martin J. Bregman MBN 25449  
BREGMAN LAW OFFICE, L.L.C.  
311 Parker Circle  
Lawrence, Kansas 66049  
Telephone: (785) 760-0319  
Email: [mjb@mjbregmanlaw.com](mailto:mjb@mjbregmanlaw.com)

**ATTORNEY FOR WESTAR ENERGY, INC.**

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was served upon the parties listed below on this 31<sup>st</sup> day of August, 2017, by either e-mail or U.S. Mail, postage prepaid.

**Missouri Public Service  
Commission**

Staff Counsel Department  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
Phone: 573-751-2690  
staffcounselerservice@psc.mo.gov

**Office of the Public Counsel**

Hampton Williams  
Tim Opitz  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
Phone: 573-751-5318  
opcservice@ded.mo.gov  
t.optiz@ded.mo.gov

**Brightergy, LLC**

Andrew Zellers  
1712 Main Street, 6th Floor  
Kansas City, MO 64108  
Phone: 816-332-0174-Ext:  
andyzellers@brightergy.com

**City of Independence, Missouri**

Alan I Robbins  
1700 Pennsylvania Ave, NW  
Suite 500  
Washington, DC 20006  
Phone: 202-370-9030-Ext:  
arobbins@jsslaw.com

**City of Independence, Missouri**

Debra D Roby  
1700 Pennsylvania Ave., NW  
Suite 500  
Washington, DC 20006  
Phone: 202-464-0539-Ext:  
droby@jsslaw.com

**City of Independence, Missouri**

Dayla Schwartz  
111 E. Maple St.  
Independence, MO 64050  
Phone: 816-325-7220-Ext:  
dschwartz@indepmo.org

**Consumers Council of Missouri**

John B Coffman  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
Phone: 573-424-6779-Ext:  
john@johncoffman.net

**Federal Executive Agencies**

Rishi Garg  
1000 Independence Ave., S.W.  
Washington, DC 20585  
Phone: 202-586-0258-Ext:  
rishi.garg@hq.doe.gov

**Great Plains Energy Incorporated**

Larry W Dority  
101 Madison, Suite 400  
Jefferson City, MO 65101  
Phone: 573-636-6758-Ext: 2  
lwdority@sprintmail.com

**Great Plains Energy Incorporated**

James M Fischer  
101 Madison Street, Suite 400  
Jefferson City, MO 65101  
Phone: 573-636-6758-Ext:  
jfischerpc@aol.com

**Great Plains Energy Incorporated**

Robert Hack  
1200 Main, 19th Floor  
P.O. Box 418679  
Kansas City, MO 64141-9679  
Phone: 816-556-2791-Ext:  
rob.hack@kcpl.com

**Westar Energy, Inc.**

Cathy Dinges  
Jeffrey Martin  
Westar Energy, Inc.  
818 S. Kansas Ave.  
Topeka, KS 66612  
cathy.dinges@westarenergy.com  
jeff.martin@westarenergy.com

**Great Plains Energy Incorporated**

Roger W Steiner  
1200 Main Street, 19th Floor  
P.O. Box 418679  
Kansas City, MO 64105-9679  
Phone: 816-556-2314-Ext:  
roger.steiner@kcpl.com

**Great Plains Energy Incorporated**

Karl Zobrist  
4520 Main Street, Suite 1100  
Kansas City, MO 64111  
Phone: 816-460-2545-Ext:  
karl.zobrist@dentons.com

**IBEW Local Union 1464**

Michael E Amash  
753 State Ave, Suite 475  
Kansas City, KS 66101  
Phone: 913-321-8884-Ext:  
mea@blake-uhlig.com

**IBEW Local Union 1613**

Michael E Amash  
753 State Ave, Suite 475  
Kansas City, KS 66101  
Phone: 913-321-8884-Ext:  
mea@blake-uhlig.com

**IBEW Local Union 412**

Michael E Amash  
753 State Ave, Suite 475  
Kansas City, KS 66101  
Phone: 913-321-8884-Ext:  
mea@blake-uhlig.com

**Kansas City Power & Light Company**

Larry W Dority  
101 Madison, Suite 400  
Jefferson City, MO 65101  
Phone: 573-636-6758-Ext: 2  
lwdority@sprintmail.com

**Kansas City Power & Light Company**

James M Fischer  
101 Madison Street, Suite 400  
Jefferson City, MO 65101  
Phone: 573-636-6758-Ext:  
jfischerpc@aol.com

**Kansas City Power & Light Company**

Robert Hack  
1200 Main, 19th Floor  
P.O. Box 418679  
Kansas City, MO 64141-9679  
Phone: 816-556-2791-Ext:  
rob.hack@kcpl.com

**Westar Energy, Inc.**

Martin J. Bregman  
Bregman Law Office, L.L.C.  
311 Parker Circle  
Lawrence, KS 66049  
mjb@mjbregmanlaw.com

**Kansas City Power & Light Company**

Roger W Steiner  
1200 Main Street, 19th Floor  
P.O. Box 418679  
Kansas City, MO 64105-9679  
Phone: 816-556-2314-Ext:  
roger.steiner@kcpl.com

**Kansas City Power & Light Company**

Karl Zobrist  
4520 Main Street, Suite 1100  
Kansas City, MO 64111  
Phone: 816-460-2545-Ext:  
karl.zobrist@dentons.com

**KCP&L Greater Missouri Operations Company**

Larry W Dority  
101 Madison, Suite 400  
Jefferson City, MO 65101  
Phone: 573-636-6758-Ext: 2  
lwdority@sprintmail.com

**KCP&L Greater Missouri Operations Company**

James M Fischer  
101 Madison Street, Suite 400  
Jefferson City, MO 65101  
Phone: 573-636-6758-Ext:  
jfischerpc@aol.com

**KCP&L Greater Missouri Operations Company**

Robert Hack  
1200 Main, 19th Floor  
P.O. Box 418679  
Kansas City, MO 64141-9679  
Phone: 816-556-2791-Ext:  
rob.hack@kcpl.com

**Midwest Energy Consumers' Group**

David L. Woodsmall, MBE #40747  
308 E. High Street, Suite 204  
Jefferson City, Missouri 65101  
(573) 636-6006 (telephone)  
(573) 636-6007 (facsimile)  
david.woodsmall@woodsmalllaw.com

**KCP&L Greater Missouri Operations Company**

Roger W Steiner  
1200 Main Street, 19th Floor  
P.O. Box 418679  
Kansas City, MO 64105-9679  
Phone: 816-556-2314-Ext:  
roger.steiner@kcpl.com

**KCP&L Greater Missouri Operations Company**

Karl Zobrist  
4520 Main Street, Suite 1100  
Kansas City, MO 64111  
Phone: 816-460-2545-Ext:  
karl.zobrist@dentons.com

**Laborers' International Union of North America (LiUNA)**

John B Coffman  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
Phone: 573-424-6779-Ext:  
john@johncoffman.net

**Missouri Industrial Energy Consumers (MIEC)**

Edward F Downey  
221 Bolivar Street, Suite 101  
Jefferson City, MO 65101  
Phone: 573-556-6622-Ext:  
efdowney@bryancave.com

**Missouri Industrial Energy Consumers (MIEC)**

Diana M Vuylsteke  
211 N. Broadway, Suite 3600  
St. Louis, MO 63102  
Phone: 314-259-2543-Ext:  
dmvuylsteke@bryancave.com

**Missouri Joint Municipal Electric Utility Commission**

Douglas Healy  
3010 E. Battlefield, Suite A  
Springfield, MO 65804  
Phone: 417-864-7018-Ext:  
doug@healylawoffices.com

**Missouri Joint Municipal Electric  
Utility Commission**

Terry M Jarrett  
514 E. High Street, Suite 22  
Jefferson City, MO 65101  
Phone: 573-415-8379-Ext:  
terry@healylawoffices.com

**Missouri Joint Municipal Electric  
Utility Commission**

Penny Speake  
3010 E. Battlefield, Suite A  
Springfield, MO 65804  
Phone: 417-864-7018-Ext: 105  
penny@healylawoffices.com

**Missouri Joint Municipal Electric Utility  
Commission**

Peggy A Whipple  
514 E. High Street, Suite A  
Jefferson City, MO 65101  
Phone: 573-415-8379-Ext:  
peggy@healylawoffices.com

**Missouri Public Service  
Commission**

Kevin Thompson  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
kevin.thompson@psc.mo.gov

**Renew Missouri**

Andrew J Linhares  
James Owen  
409 Vandiver Dr  
Building 5, Suite 205  
Columbia, MO 65202  
Phone: 314-471-9973-Ext:  
Andrew@renewmo.org  
James@renewmo.org

**Sierra Club**

Henry B Robertson  
319 N. Fourth St., Suite 800  
St. Louis, MO 63102  
Phone: 314-231-4181-Ext:  
hrobertson@greatriverslaw.org

**United States Department of Energy**

Rishi Garg  
1000 Independence Ave., S.W.  
Washington, DC 20585  
Phone: 202-586-0258-Ext:  
rishi.garg@hq.doe.gov

**Westar Energy, Inc.**

Legal Department  
818 South Kansas Ave.  
Topeka, KS 66612  
Phone: 555-555-5555

**Kansas Electric Power Cooperative, Inc.**

600 SW Corporate View  
Topeka, KS 66615  
briggins@kepco.org

*1/s/ Robert J. Hack*

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