

Exhibit No.:
Issue: CIS (CC&B)
Witness: Forrest Archibald
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Kansas City Power & Light Company
and KCP&L Greater Missouri Operations
Company
Case Nos.: ER-2018-0145 and ER-2018-0146
Date Testimony Prepared: July 27, 2018

MISSOURI PUBLIC SERVICE COMMISSION

CASE NOS.: ER-2018-0145 and ER-2018-0146

REBUTTAL TESTIMONY

OF

FORREST ARCHIBALD

ON BEHALF OF

**KANSAS CITY POWER & LIGHT COMPANY and
KCP&L GREATER MISSOURI OPERATIONS COMPANY**

**Kansas City, Missouri
July 2018**

KCP&L Exhibit No. 102
Date 9-25-18 Reporter JW
File No. ER-2018-0145 + 0146

REBUTTAL TESTIMONY

OF

FORREST ARCHIBALD

Case Nos. ER-2018-0145 and ER-2018-0146

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

2 A: My name is Forrest Archibald. My business address is 1200 Main Street, 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”) as Director of
6 Project Controls. The focus of this position is typically oversight of capital investment
7 projects valued more than \$100 million.

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

9 A: I am testifying on behalf of KCP&L and KCP&L Greater Missouri Operations Company
10 (“GMO”) (collectively, the “Company”).

11 **Q: Are you the same Forrest Archibald who filed Direct Testimony in both ER-2018-
12 0145 and ER-2018-0146?**

13 A: Yes, I am.

14 **Q: What is the purpose of your rebuttal testimony?**

15 A: I will respond to the direct testimony of Office of the Public Counsel (“OPC”) witness
16 Mr. John Robinett regarding the One CIS Solution Project. Specifically, Mr. Robinett
17 testified that:

18 OPC seeks to allocate the costs that are fair and just for Missouri
19 ratepayers. The ONE CIS is a major factor of the savings that the
20 merger with Westar as it will allow Westar to be integrated into the

1 system without having to foot the bill for an entirely separate
2 system at some point in the future. (Robinett Direct, p. 17)

3 and

4 At this time OPC still has pending discovery related to this issue.
5 OPC will be better positioned at rebuttal to provide an allocation
6 method and cost estimates for the KCPL MO and GMO
7 jurisdictions to be included in the cost of service for these cases.
8 (Robinett Direct, p. 17)

9 **Q: How do you interpret this testimony of Mr. Robinett?**

10 A: It appears that Mr. Robinett believes that some portion of the One CIS Solution Project
11 should be allocated to Westar Energy, Inc. (“Westar”), a new sister utility of KCP&L and
12 GMO as a result of the June 4 merger of Great Plains Energy Incorporated (the former
13 parent company of KCP&L and GMO) and Westar that was approved by the
14 Commission in Case No. EM-2018-0012. And it further appears that Mr. Robinett
15 intends to propose a method for allocating the costs of the One CIS Solution Project
16 between KCP&L, GMO and Westar in subsequent testimony.

17 **Q: Is allocation of any costs of the One CIS Solution Project to Westar appropriate?**

18 A: No. The One CIS Solution Project, which went live in May 2018 for KCP&L and GMO
19 customers, is not being used to serve Westar customers. The One CIS Solution Project,
20 designed to serve KCP&L and GMO, is based on the needs and business processes of
21 KCP&L and GMO and not those of Westar. Similarly, the One CIS Solution Project was
22 sized to meet the needs of KCP&L and GMO now and into the foreseeable future, and
23 was not sized to meet the needs of Westar. As the project manager for the One CIS
24 Solution Project I can say with 100% conviction that the entirety of that project – from
25 initial due diligence through budget development, design work, quality assurance testing

1 and, ultimately, implementation in May 2018 – centered on the needs, characteristics and
2 business processes of KCP&L and GMO and not those of Westar.

3 **Q: Will the One CIS Solution be used to serve Westar customers?**

4 A: It is our hope and expectation that the One CIS Solution will ultimately be used to serve
5 Westar customers. It is not presently known, however, when that will occur. Although
6 we are currently in the due diligence phase that is expected to lead to the launch of a
7 project to implement the One CIS Solution for Westar, no such project has yet been
8 launched. No budget has been developed or approved to implement the One CIS
9 Solution for Westar, no team has been named to work on that project and no target date
10 for implementation of the One CIS Solution for Westar has been established.

11 **Q: Does that conclude your rebuttal testimony?**

12 A: Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light)
Company's Request for Authority to Implement) Case No. ER-2018-0145
A General Rate Increase for Electric Service)

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 FORREST B. ARCHIBALD

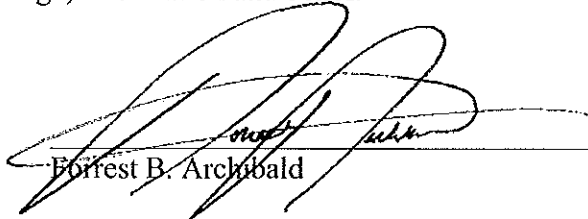
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Forrest B. Archibald, being first duly sworn on his oath, states:

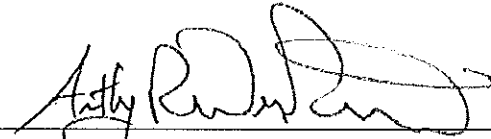
1. My name is Forrest B. Archibald. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Director Project Controls.

2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company consisting of _____ (____) 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.


Forrest B. Archibald

Subscribed and sworn before me this ____ day of July 2018.


Notary Public

My commission expires: 4/26/2021

