



made, is now incorrect in any material respect. For any request to which CAC fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to page 11 of the Direct Testimony of Jack E. Burch (“Burch Testimony”), line 21. Mr. Burch states KU’s late payment charge as 10 percent. Explain whether Mr. Burch intended to state it as 5 percent.

2. Refer to pages 12 and 13 of the Burch Testimony where he discusses the change in the bill due date from 10 days to 12 days. Mr. Burch states that this change has resulted in customers having less time to pay their bills. Is it Mr. Burch’s testimony that, under the former 10-day bill due date, only business days were counted and that, under the current 12-day bill due date, all calendar days are counted? If yes, is it Mr. Burch’s testimony that this results in less time for customers to pay their bills? If no, explain why adding two extra days for customers to pay their bills results in less time.

3. Refer to page 13 of the Burch Testimony where he discusses the FLEX Option program. Mr. Burch states that, “simply allowing customers to choose their due date to accommodate a fixed income, while helpful, does not serve to extend the billing cycle in any way.” Explain what is meant by “billing cycle” in this context, and given the FLEX Option, explain why the billing cycle needs to be extended.



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cc: Parties of Record

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