AFFIDAVIT OF DENNIS L. REED
SELF REPORT OF A
STANDARDS OF CONDUCT EVENT

I. INTRODUCTION

My name is Dennis L. Reed. I am Director of Transmission Services and Chief Compliance Officer for Westar Energy, Inc. ("Westar Energy"). My business address is 818 S. Kansas Avenue, Topeka, Kansas, 66612.

I graduated from Wichita State University with a degree of Bachelor of Science, Electrical Engineering in December of 1980. I was employed by Kansas Gas and Electric Company (KG&E) in 1974 and worked in the Engineering Department as an Engineering Technician in Overhead Transmission Line Design. I transferred to the Regulatory Department in 1979 to take over the Load Research program. As part of my duties, I also did rate design and revenue impact analysis on our retail customers for several rate cases. In 1987, I transferred to the Forecasting Department where I performed long-range economic studies, energy forecasts and peak demand forecasts for the company. I remained in the Forecasting Department after KG&E merged with The Kansas Power and Light Company (now Westar) in 1992. I transferred to Transmission Services as Manager of Transmission Services in 1996 and I have remained in that department since that time having advanced to Director of Transmission Services in 2004. I was appointed Chief Compliance Officer for Westar Energy in September 2006.

I am submitting this affidavit to self report to the Commission's Enforcement staff a Standards of Conduct violation and submit the related data.

II. BACKGROUND INFORMATION RELATED TO THE POSTING

As part of Westar Energy's review process to enforce the Standard of Conduct rules, a member of the Chief Compliance Officer's (CCO) staff logs into various computer systems that are shared between Westar Energy's Transmission Function employees and the Marketing and Energy Affiliate employees (MEA) with a MEA login to verify that MEA employees do not have access to non-public transmission data. Westar Energy reviews its internal SOC firewalls at least annually, and also when there has been a change to one of the shared systems between the Transmission Function and the MEA. Westar Energy's Energy Accounting System (EAS) as a whole contains all the interconnect metering, Balancing Area schedules, load calculations, co-owner generation calculations to divide up the energy out of the co-owner plants, generation meter data and other related data. MEA employees have access to part of the data contained in the EAS in accordance with Appendix C of Westar Energy's Standards of Conduct Procedures which is posted on Westar Energy's OASIS.

On June 1, 2007, while performing a review of the EAS related to a system change, a CCO staff member discovered that there existed a link on the "ea_kpl_cities" page which, if accessed, would have taken an MEA employee to the interconnection primary accumulator meter data (form name "ICPACCM"). The "ea_kpl_cities" page contains the hourly energy information for various wholesale cities on the northern part of the Westar system. These wholesale customers are customers of Westar's MEA. The ICPACCM form contains the hourly energy values for the various tie meters between Westar Energy and the surrounding Balancing Areas. Access to the ICPACCM form does not give a user broader access to the EAS.

III. RESPONSE

Upon discovering the link on the "ea_kpl_cities" page, the CCO staff member immediately reported the finding to the CCO and to Westar Energy's information technology (IT) staff at 10:20 AM. A fix was put into the production system at 11:47 AM the same day to eliminate the link from the"ea_kpl_cities" page. After confirming the fix was working, the incident was posted on the OASIS system pursuant to the Commission's Standards of Conduct regulations. CCO staff also initiated an investigation to determine whether any MEA employee had accessed the link. The investigation included interviews with MEA supervisory employees and members of Westar Energy's IT department and a scan of the system to determine whether any employees had accessed the link and, if so, the identities of such employees.

The investigation showed that no MEA employee ever accessed the link. MEA employees rarely used the EAS form on which the link was located. The page is primarily used by the financial employees for billing purposes. None of the MEA employees interviewed, or any of their staff, knew the link existed and did not access the link; therefore the data accessible via the link was never used in a manner to gain a market advantage.

The IT department's scan of the EAS system back to the system's inception (approximately 1997-1998) confirmed that no MEA employee ever accessed the link. EAS audit logs show that no employee with a MEA login ever queried the ICPACCM form. The search did reveal three queries of the ICPACCM form by users with MEA system logins: two in 2004 by one of the IT support staff, and one query on February 9, 2007 by an employee from the regulatory department.

IV. SOLUTIONS

The CCO staff will review any revised EAS forms to be sure the correct versions have been moved into production. The CCO staff will continue its annual review of all the links in EAS, as well as its review of the system whenever there is a system change.

V. SUMMARY AND CONCLUSION

A link on an EAS form potentially provided MEA employees access to interchange meter data. Upon discovery of the link, the Company acted quickly to remove the link and post a description of the occurrence on its OASIS system. An internal investigation confirmed that no MEA employee ever accessed the link. This concludes my affidavit.

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County of Shawnee)
) ss:
State of Kansas)

I, Dennis L. Reed, being duly sworn, depose and state that the contents of the foregoing affidavit are true, correct, accurate and complete to the best of my knowledge, information, and belief.

Dennis L. Reed

Dennis L. Reed

Subscribed and sworn to before me this 9th day of October, 2007

My commission expires: 11-18-08

Patti Beasley

Notary Public

Patti Beasley
NOTARY PUBLIC--STATE OF KANSAS
MY APPT EXP: 11-18-08