BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Joint Application of Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. for Approval of their Annual Energy Cost Correction Adjustment Factor	)))))	357 Docket No. 25-EKCE-XXX-ACA

JOINT APPLICATION

COME NOW Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (collectively referred to as "Evergy Kansas Central") and file this Joint Application for approval of their Annual Correction Adjustment (ACA) factors under their Retail Energy Cost Adjustment (RECA) clauses. In support of this Joint Application, Evergy Kansas Central states:

1. Evergy Kansas Central is a corporation duly incorporated under the laws of the State of Kansas and is engaged, among other matters, in the retail electric public utility business, as defined by K.S.A. 66-104, in legally designated areas within the state of Kansas. Evergy Kansas Central holds certificates of convenience and authority issued by this Commission authorizing it to engage in such utility business.

2. With this Application, Evergy Kansas Central is submitting its annual ACA filing required by its RECA tariff to be filed on or before March 20 each year, in order to determine the amount of costs recovered under the RECA during the previous calendar year and the amount of costs actually incurred for fuel and wholesale purchased power during that calendar year. As part of this ACA filing, Evergy Kansas Central calculates the amount it either over- or under-recovered during the previous calendar year and that amount – the ACA factor – is added to or subtracted from the RECA rate beginning April 1 through March 31 of the following year.

3. The testimony of Elizabeth A. Herrington and Jessica L. Tucker are attached to this Joint Application. Ms. Herrington explains the calculations and assumptions underlying the

calculation of the total over-recovered amount requested ACA factor. Ms. Tucker addresses Evergy Kansas Central's quarterly RECA submittals, market drivers of the variance between 2024 actual fuel and purchased power costs when compared to 2023 actual costs and the 2024 RECA forecast, Evergy Kansas Central's fuel procurement practices, and the impact of the Southwest Power Pool Integrated Market on Evergy Kansas Central's planning and operations.

4. There are two exhibits attached to Ms. Herrington's testimony and incorporated herein by reference. Exhibit A summarizes the actual energy costs incurred and all components of the RECA incurred by Evergy Kansas Central during the ACA period beginning January 1, 2024, through December 31, 2024. Exhibit A also shows the over/under recovery of energy costs and the calculation of the ACA factor for the period January 1, 2024, through December 31, 2024, to be reflected in the Evergy Kansas Central RECA beginning on April 1, 2025. Because there was an over-recovery of costs, Evergy Kansas Central's ACA will be $-0.0125 cents/kWh. Exhibit B has the same information contained in Exhibit A by month for the 2024 ACA period.

5. Evergy Kansas Central submits that the energy costs recovered through the RECA mechanism for the period January 1, 2024, through December 31, 2024, were reasonable and complied in all respects with applicable standards established by the Commission in Docket No. 106,850-U (75-GIMC-009-GIG) and Docket No. 05-WSEE-981-RTS.

6. Some information contained in the exhibits to Ms. Herrington's testimony have not been publicly disclosed and, if disclosed, could place Evergy Kansas Central at a significant competitive disadvantage in negotiating future fuel contracts. Therefore, a redacted version of Ms. Herrington's exhibits is also enclosed. Accordingly, Evergy Kansas Central requests

Exhibits A and B that are marked confidential be designated and treated as confidential in accordance with applicable Commission and statutory standards and practices.

7. In addition to the undersigned, all correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Linda Nunn
Manager - Regulatory Affairs
Evergy, Inc.
1200 Main Street – 19th Floor
Kansas City, Missouri 64105
Phone: (816) 652-1292
Email: linda.nunn@evergy.com

And

Leslie R. Wines
Senior Executive Administrative Assistant
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818 South Kansas Ave
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Phone: (785) 575-1584
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WHEREFORE, Evergy Kansas Central requests that an ACA factor of $-0.0125 cents/kWh for the period April 2025 through March 2026 be approved by the Commission.

Respectfully submitted,

/s/ Cathryn J. Dinges

Cathryn J. Dinges (#20848)
Senior Director and Regulatory Affairs Counsel
818 South Kansas Avenue
Topeka, Kansas 66612
Telephone: (785) 575-8344
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Cathy.Dinges@evergy.com

Counsel for Evergy Kansas Central, Inc.

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

VERIFICATION

Cathy Dinges. being duly sworn upon his oath deposes and states that she is the Sr Director and Regulatory Affairs Counsel for Evergy Inc., that she has read and is familiar with the foregoing Application and attests that the statements contained therein are true and correct to the best of his knowledge, information and belief.

Cathryn Dinges

Cathryn J. Dinges

Subscribed and sworn to before me this 20th day of March, 2025.

Leslie R. Wines

Notary Public

My Appointment Expires May 30, 2026

NOTARY PUBLIC - State of Kansas
LESLIE R. WINES
MY APPT. EXPIRES 5/30/2026

BEFORE THE STATE CORPORATION COMMISSION

OF THE STATE OF KANSAS

DIRECT TESTIMONY

OF

ELIZABETH A. HERRINGTON

EVERGY KANSAS CENTRAL

DOCKET NO. 25-EKCE-XXX-ACA

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. Elizabeth A. Herrington, 1200 Main, Kansas City, Missouri 64105-2122.

Q. BY WHOM AND IN WHAT CAPACITY ARE YOU EMPLOYED?

A. I am employed by Evergy Metro, Inc. and serve as Senior Director, Power, Energy and Revenue Accounting for Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("Evergy Kansas Metro") and Evergy Missouri Metro ("Evergy Missouri Metro"), Evergy Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central ("Evergy Kansas Central"), and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West"). They are the operating utilities of Evergy, Inc. ("Evergy").

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE.

A. I graduated from the University of Missouri-Columbia in May 1992 with a Bachelor of Science in Accountancy. In October 1997, I joined the

Company as a staff accountant and have held several roles such as Supervisor - Accounts Receivable, Supervisor - Regulatory Accounting, Manager - Revenue and Fuel Accounting, Manager - Energy Accounting, Senior Manager – Accounting, and Director of Energy and Revenue Accounting before assuming my current role.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. My testimony supports Evergy Kansas Central's request for Commission approval of the 2025 ACA amount and associated true-up factor related to the Company's Retail Energy Cost Adjustment ("RECA") tariff. I will explain the actual revenues and expenses behind the 2024 RECA mechanism and the resulting ACA true-up factor to be effective and applied for 2025.

Q. PLEASE PROVIDE A GENERAL BACKGROUND OF THE FILING AND WHY IT IS BEING MADE AT THIS TIME.

A. On December 28, 2005, the Commission issued an order in Evergy Kansas Central's rate proceeding, Docket No. 05-WSEE-981-RTS (981 Docket). The Commission approved implementation of a fuel clause for Evergy Kansas Central's Kansas retail customers in the 981 Docket. The Retail Energy Cost Adjustment (RECA) tariff requires Evergy Kansas Central to "true-up" the projected energy costs to actual energy costs on or before March 20th of each year. Additionally, in Docket No. 18-WSEE-328-RTS, the Commission ordered the lost revenue from the expiration of Westar's purchase power agreement ("PPA") with Mid-Kansas Electric Company

("MKEC") to be recovered from customers through the RECA beginning January 3, 2019, as an addition to the ACA true-up process until such time as base rates could be appropriately adjusted in Kansas Central's next rate case. Finally, On June 23, 2022, as a part of Docket 21-EKME-329-GIE the Commission ordered that the Company should recover amounts incurred during the 2021 cold weather event known as Winter Storm Uri as an addition to the ACA true up process over a two year period beginning with the 2023 ACA.

WERE THERE ANY CHANGES MADE TO THE RECA TARIFF IN 2024?

A. Yes. As Ordered in Docket 23-EKCE-775-RTS, MKEC language was removed from the WR factor, short-term capacity revenues and expenses were added to the Purchased Power section, long-term capacity revenues and expenses for contracts entered into after December 21, 2023, were added to the Purchased Power section and the reference to Solar kWh tariff in the non-requirements section was removed as the Solar kWh tariff was cancelled.

Q. IS THERE ANYTHING ELSE IMPACTING THIS ACA FILING THAT SHOULD BE MENTIONED?

A. Yes. As of December 31, 2024, substantially all of the MKEC lost revenue and Uri amounts have been recovered from customers and the Company is no longer incurring costs for these items. However, the 2024 ACA amount that still includes these items continues to be collected through March 31,

2025, per the RECA tariff, and will create a substantial over collection for the 2026 ACA filing.

Q: HOW MUCH IS THE OVERCOLLECTION FOR THE MKEC LOST REVENUES AND WINTER STORM URI THROUGH MARCH 31, 2025?

A: At the time of this filing the Company will have not completed all billing cycles through March 31, 2025. However, a close estimate can be provided for each. The Company estimates it will have over collected ** [redacted] ** for MKEC and ** [redacted] ** for Uri.

Q: WILL THE MKEC LOST REVENUE AND WINTER STORM URI AMOUNTS EVER BE TRUED UP IN THE ACA?

A: Not without requesting an exception to the RECA tariff. Due to the tariff continuing to collect or return monies to and from customers through March 31 of the subsequent year, the MKEC lost revenue and Winter Storm Uri amounts will continue to be over, and then under, collected for the foreseeable future because no further costs are being incurred. Therefore, the Company is requesting to include the January 2025 through March 2025 over collected amounts in this filing in an attempt to create a final, immaterial true up at the end of 2025 to be absorbed by the ACA. This action will also return the large over collection created by the tariff to customers in a timelier fashion.

Q. ARE THERE ANY EXHIBITS FILED WITH EVERGY KANSAS CENTRAL'S ACA APPLICATION PREPARED BY YOU OR PREPARED UNDER YOUR DIRECT SUPERVISION?

A. Yes. There are two exhibits, A and B.

Q. PLEASE DESCRIBE THE EXHIBITS.

A. Exhibit A summarizes components of the RECA calculation incurred by Evergy Kansas Central during the ACA period beginning January 1, 2024 through December 31, 2024, used to derive the 2025 Annual Correction Adjustment for Evergy Kansas Central. Exhibit B illustrates the same information as Exhibit A but shows the individual monthly components for the ACA period calculations.

Q. DID EVERGY KANSAS CENTRAL HAVE AN (OVER)/UNDER RECOVERY BALANCE AT THE END OF DECEMBER 2024?

A. At the end of 2024 there was an under-recovery. As described in Exhibit B, the under-recovery balance for the year January 2024 through December 2024 is ** [redacted] **. In summary, Evergy Kansas Central incurred ** [redacted] ** of fuel expense and purchased power less certain offsets to provide electric service to non-requirements customers and non-fuel delta. Evergy Kansas Central recovered ** [redacted] ** from retail customers through the RECA and wholesale customers during the same time period.

Q. PLEASE DESCRIBE THE COMPONENTS OF THE 2024 UNDER RECOVERY.

A. The 2024 under recovery is made up of fuel expense and purchased power [redacted] ** offset by certain costs to provide electric service to non-requirements customers

[redacted]**. As shown in Exhibit A, these amounts are offset with the collection of fuel revenues from customers of **[redacted]**. This totals the **[redacted]** under-recovery as shown above **[redacted]**.

Q: ARE THERE ANY ADDITIONAL AMOUNTS TO ADD TO THE 2024 UNDER RECOVERY?

A: No. At the end of 2024, amounts previously included for the MKEC lost revenue have been included in base rates and Winter Storm Uri costs have been collected from customers.

Q. IS THERE AN OVER OR UNDER RECOVERY FOR THE 2023 ACA?

A. At the end of 2024 the 2023 ACA amount is over collected **[redacted]**. This amount over-recovered from the previous ACA year along with the estimated over recoveries for MKEC and Winter Storm Uri through March 2025 is **[redacted]**. This amount will be subtracted from the 2024 under recovered components described above and results in a total ACA amount of $-2,399,118 **[redacted]** for 2025 as shown in Exhibit A.

Q. WAS THERE A WESTERN PLAINS WIND FARM EXCESS OR DEFICIENCY FOR THE THREE-YEAR ROLLING AVERAGE 2022 TO 2024?

A. In the 18-WSEE-328-RTS Non-Unanimous Stipulation and Agreement, parties agreed that if the Western Plains Wind Farm has a capacity factor of greater than 48.57%, producing more than 1,193,878 MWhs in any

calendar year, based on a rolling three-year average, beginning with the three-year period ending December 2020, Evergy Kansas Central will be allowed to include a charge in the ACA filing to the benefit of Evergy Kansas Central that equates to the difference between the actual production and the 1,193,878 MWhs, multiplied by $20.70/MWh. In the event that the Western Plains Wind Farm has a capacity factor of less than 44.57%, producing less than 1,095,556 MWH's in any calendar year, based on a rolling three-year average beginning in 2020 and using the three-year average for 2018-2020, there will be a credit in the ACA filings to return to ratepayers any shortfall in MWh's from 1,095,556 MWhs, multiplied by $20.70/MWh. The three-year rolling average for 2022 through 2024 was 45.82%, which falls between the lower end cap of 44.57% and the upper cap of 48.57%. Therefore, there is no adjustment for the Western Plains Wind Farm in this ACA filing.

Q: WHAT ACTION IS THE COMPANY REQUESTING FROM THE COMMISSION FOR THE PORTION OF THE OVER-RECOVERY IT PROPSOSES TO RECOVER THROUGH THIS ACA FILING?

A: Evergy Kansas Central recommends that the Commission approve its ACA factor that will result in Evergy reimbursing the Kansas retail customers the over-recovery amount over a twelve-month period beginning April 1, 2025 in accordance with the Company's RECA tariff. As shown in Exhibit A, this over-collection results in an ACA factor of $-0.0125 cents per kWh which would be added to the RECA factors for each month beginning April 1,

2025. Additionally, the Company is requesting an exception to the tariff to return the amounts over recovered from customers during January 2025 through March 2025 due to MKEC and Winter Storm Uri as described above.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

EVERGY KANSAS CENTRAL, INC.
RETAIL ENERGY COST ADJUSTMENT REPORT
Energy Cost Adjustment Calculation

Docket No. 25-EKCE-XXX-ACA
Exhibit A

Public

ANNUAL CORRECTION ADJUSTMENT

Annual Correction Factor for the ACA Year Ending **2024**

	(a)	(b)	(c)	(d)	(e)
	Annual Correction Adjustment Factor			**Cost**	**kWh**
1	Actual Fuel Costs		F_A =		
	Fuel	**Actual Costs**			
2	Account 501				
3	Account 518				
4	Account 547				
5	Total Fuel Costs				
6	Actual Purchased Power Energy Costs		P_A =		
7	Actual Emission Cost/Revenue		E_A =		
8	Actual Cost to Achieve to Non - Requirements Customers		$NRCA_A$ =		
9	Actual Fuel Revenues Collected for ACA Year		FAR_A =		
10	Wholesale Non-Fuel Delta		WR =		
11	Western Plains Wind Farm Excess (after year 2020)		$WPWF_E$ =		
12	Western Plains Wind Farm Deficiency (after year 2020)		$WPWF_D$ =		
13	Actual ACA Remaining from the previous ACA year		ACAB =		
14	**Total (F_A+P_A+E_A-$NRCA_A$-FAR_A+/-WR+$WPWF_E$-$WPWF_D$)+ACAB**			$ (2,399,118)	
15	kWhs delivered to all Requirement Customers during the billing year				S_A = 19,172,164,876 **kWh**
16	Projected Annual Correction Adjustment Factor				(0.0125)

$$ACAF_P = \frac{(F_A+P_A+E_A-NRCA_A-FAR_A+/-WR+WPWF_E-WPWF_D)+ACAB}{.01 \times S_A} =$$

¢/kWh

EVERGY KANSAS CENTRAL, INC
2024 Actual RECA Monthly Update

Docket No. 25-EKCE-XXX-ACA
Exhibit B
Page 1 of 1

Line #		January 2024	February 2024	March 2024	April 2024	May 2024	June 2024	July 2024	August 2024	September 2024	October 2024	November 2024	December 2024	YTD 2024	
1	F_A Component of the RECA Tariff - Fuel Costs														
2															
3	Account 501														
4	Account 518														
5	Account 547														
6	**Total Fuel Costs F_A Component (line 3 + line 4 + line 5)**														
7															
8	P_A Component of the RECA Tariff - Purchased Power Costs														
9															
10	Purchased Power														
11	Gain/Loss on Sales of Renewable Energy Credits														
12	Renewable Energy Revenues														
13	**Total Fuel Costs P_A Component (line 10 + line 11 + line 12)**														
14															
15	E_A Component of the RECA Tariff - Emission Allowances														
16															
17	**Total Emission Cost/(Revenue) - E_A Component**														
18															
19	$NRCA_A$ Component of the RECA Tariff - Cost to Achieve Non-Requirements														
20															
21	**Actual Cost to Achieve to Non-Requirements Customers - $NRCA_A$ Component**														
22															
23															
24	FAR_A Component of the RECA Tariff - Actual Fuel Adjustment Revenues														
25															
26	Wholesale Customer Fuel Revenues (GFR)														
27	Retail Fuel Revenues														
28	DRPS Wind Farm Revenues														
29	Uncollected for Previous Month														
30	Uncollected for Current Month														
31	**Total Fuel Adjustment Revenues - FAR_A (line 26 + line 27+ line 28 + line 29 + line 30)**														
32															
33	WR Component Wholesale Non-fuel in Base Rates vs. 2018 Actual														
34															
35	Demand Difference														
36	VOM Difference														
37	**Total Wholesale Non-Fuel Difference (Line 35 + Line 36)**														
38															
39	**Total Costs (line 6 + line 13 + line 17 - line 21 - line 37)**														
40															
41	**RECA (Over)/Under Recovery for 2024 (line 39 - line 31)**														
42															
43	ACAB Component of the RECA Tariff - Actual ACA Balance From Previous ACA Year														
44															
45	**Actual ACA Recovery from Prior Year**														
46	**MKEC and URI Recovery for Jan 2025 - March 2025**														
47	ACA Amount from Previous Year's Filing														
48	**Total Actual ACA Remaining From the Previous ACA Year (ACAB)**														
49															
50	**Total (F_A+P_A+E_A-$NRCA_A$-FAR_A+/-WR+$WPWF_E$-$WPWF_D$)+ACAB**													**$ (2,399,118)**	
51															
52	S_A Component of the RECA Tariff - kWh Delivered to Company's Requirements Customers														
53															
54	**Total kWhs delivered to Company's Requirements Customers**													19,172,164,876	
55															
56	**RECA Factor for 2024 (line 39/line 53) - cents/kWh**	3.2592	1.5759	1.7957	1.9218	0.8028	3.0340	1.7751	2.0926	1.7148	2.1161	2.3143	2.1514	2.0622	**¢/kWh**

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

VERIFICATION

Elizabeth Herrington, being duly sworn upon her oath deposes and states that she is the Sr. Director, Power, Energy and Revenue Accounting, for Evergy, Inc., that she has read and is familiar with the foregoing Direct Testimony, and attests that the statements contained therein are true and correct to the best of her knowledge, information and belief.

Elizabeth Herrington

Subscribed and sworn to before me this 20th day of March, 2025.

Notary Public

My Appointment Expires May 30, 2026

NOTARY PUBLIC - State of Kansas
LESLIE R. WINES
MY APPT. EXPIRES 5/30/2026

BEFORE THE STATE CORPORATION COMMISSION

OF THE STATE OF KANSAS

DIRECT TESTIMONY

OF

JESSICA L. TUCKER

EVERGY KANSAS CENTRAL

DOCKET NO. 25-EKCE-XXX-ACA

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Jessica L. Tucker. My business address is 1200 Main, Kansas City, Missouri 64105-2122.

Q. BY WHOM AND IN WHAT CAPACITY ARE YOU EMPLOYED?

A. I am employed by Evergy Metro, Inc. and serve as Senior Manager, Fuels and Emissions for Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("Evergy Kansas Metro"), Evergy Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central ("Evergy Kansas Central"), Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri Metro"), and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West"). They are the operating utilities of Evergy, Inc. ("Evergy").

Q: WHAT ARE YOUR RESPONSIBILITIES?

A: My primary responsibilities include management and oversight of fuel procurement and logistics (apart from natural gas) as well as fuel additive procurement and coal combustion residual product management and marketing for Evergy operated generating stations.

Q: PLEASE DESCRIBE YOUR EDUCATION, EXPERIENCE, AND EMPLOYMENT HISTORY.

A. I graduated Summa Cum Laude from Kansas State University in December 1999 with a Bachelor of Science degree in Agriculture. I began my career in the energy industry in January 2001 with Aquila as an Associate Hourly Trader. In this role, my efforts were focused on executing short term physical power transactions in the real time market across various North American Electric Reliability Corporation ("NERC") regions. My employment with Evergy Metro (f/k/a KCP&L) began in August of 2002 as an Hourly Trader on the real time desk. From August 2002 to May 2006, my role focused on buying and selling power in the real time market. In June 2006, I was promoted to Interchange Marketer, which focused my trading activity on day ahead and monthly power transactions. I was also a part of the Company's RTO integration team that prepared the generation dispatching and trading area for participation in the Southwest Power Pool ("SPP") Energy Imbalance Service ("EIS") market, which launched on February 1, 2007. In November 2010, I was promoted to Manager, System Operations (Power). My primary responsibility was to oversee 24x7 Power Control Center functions, which

consisted of real time and day ahead power trading, power scheduling, and generation dispatching operations. This not only included overseeing our participation in the SPP market, but compliance with applicable NERC Reliability Standards as well. I was also responsible for preparing the dispatching and trading group for participation in the SPP Integrated Marketplace ("IM"), which launched on March 1, 2014. In April 2015, I was promoted to Senior Manager, Power System Operations. In July 2017, I moved into the role of Senior Manager, Fuels & Emissions within the Fuels group.

Q: HAVE YOU PREVIOUSLY TESTIFIED IN A PROCEEDING AT THE KANSAS CORPORATION COMMISSION ("KCC" OR "COMMISSION") OR BEFORE ANY OTHER UTILITY REGULATORY AGENCY?

A: Yes. I have testified in several dockets before the Missouri Public Service Commission and/or KCC regarding certain topics associated with the Southwest Power Pool Integrated Marketplace or fuel-related subject matter.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. I will address five topics:

- A summary of the information provided in the Company's quarterly RECA submittals made on December 20, 2023, March 20, 2024, June 20, 2024, and September 20, 2024,
- A comparison of 2024 fuel and purchased power costs to 2023 fuel and purchased power costs,

- A comparison of the projected 2024 RECA to its 2024 ACA,
- Fuel procurement planning and practices, and
- A discussion of how the Southwest Power Pool ("SPP") Integrated Marketplace ("IM") provides value to Evergy Kansas Central ("EKC") and the impact it has on planning and operations.

INFORMATION PROVIDED IN QUARTERLY RECA SUBMITTALS

Q. WHAT INFORMATION DOES THE COMPANY SUBMIT WHEN IT SUBMITS ITS RECA FACTORS EACH QUARTER?

A. Evergy Kansas Central's RECA tariff identifies several items that go into the calculation of the RECA factors. Items included in the quarterly projections are fuel and purchased power costs, transmission costs not recovered through the Transmission Delivery Charge ("TDC"), emission allowances and costs to achieve sales to non-requirements customers. On or before the 20th day of the month preceding each calendar quarter, the Company submits to the Commission a report containing projected quarterly RECA factor on a dollars per kWh basis. In this report, the Company shows the total costs, revenues, and kWh used to calculate the dollars per kWh factor.

Q. WERE THERE ANY CHANGES TO THIS QUARTERLY PROCESS IN 2024?

A: No, there were no changes to the quarterly process in 2024. There were, however, changes to the RECA Tariff which are described in the testimony of Elizabeth Herrington.

COMPARISON OF COSTS FOR 2024 and 2023

Q. HOW DID REALIZED FUEL AND PURCHASED POWER COSTS FOR 2024 COMPARE WITH THOSE REALIZED DURING 2023?

A. As described in the exhibits provided with Ms. Herrington's testimony, for 2024, total fuel and purchased power costs less certain offsets to provide electric service to non-requirements customers and non-fuel delta, which are used to calculate the ACA factor were **[redacted]**. In 2023, total fuel and purchased power costs less certain offsets to provide electric service to non-requirements customers and non-fuel delta, excluding the impacts of Winter Storm Uri, were **[redacted]**.

Q. WHY DID FUEL AND PURCHASED POWER COSTS VARY FROM 2023 TO 2024?

A. The key drivers for the variance in Evergy Kansas Central's actual fuel and purchased power costs in 2024 as compared to the costs in 2023 were changes in market commodity prices, generation availability, and phaseout of the Mid-Kansas Electric Company ("MKEC") lost revenue credit. In accordance with the Order in docket 23-EKCE-775-RTS, the MKEC amount is included in base rates and no longer included in the Actual Cost Adjustment (ACA).

PROJECTED 2024 RECA VERSUS ACTUAL 2024 ACA

Q. WHAT TYPE OF MODELING IS USED TO DEVELOP THE QUARTERLY RECA FORECAST?

A. In 2024, EKC RECA forecasts were generated using the PROMOD® IV ("PROMOD") software, which is similar to other fundamental price forecasting models that are commonly used in the industry. PROMOD is provided by Hitachi Energy (formerly ABB). PROMOD incorporates details in generating unit characteristics, transmission grid topology and constraints, and market system operations to simulate power flows within and between various energy markets, including but not limited to, Independent System Operators ("ISO"), Regional Transmission Organizations ("RTO"), and other North American Electric Reliability Corporation regions. PROMOD performs a security constrained unit commitment and co-optimized economic dispatch to generate Locational Marginal Prices ("LMP") at the nodal level, similar to how ISOs and RTOs set schedules and determine prices. PROMOD incorporates the latest forecasts or assumptions for commodity and market pricing, generating unit operations and load requirements to generate expected plant dispatch and resulting fuel and purchased power costs.

Q. HOW DID ACTUAL COSTS REFLECTED IN THIS ACA FILING COMPARE TO PROJECTED RECA COSTS INCLUDED IN QUARTERLY FILINGS FOR 2024?

A. As described in the exhibits provided with Ms. Herrington's testimony, actual incurred costs in 2024 were ** [redacted] ** and revenues collected based on EKC's quarterly RECA forecasts were ** [redacted] **, with a total under-collection of ** [redacted] **.

Q. WHAT WERE THE DRIVERS OF THE VARIANCE BETWEEN ACTUAL FUEL AND PURCHASED POWER COSTS IN 2024 AS COMPARED TO THE RECA FORECAST?

A. Although various components of EKC's 2024 actual fuel and purchased power costs, such as cost of fuel, generation availability, and energy demand, deviated on a month-to-month basis from the RECA quarterly forecasts, those variances were not the major drivers of the 2024 overall result, which was a total under-collection of **[redacted]**. The majority of the variance that drove the under-collection was due to the January 2024 winter weather event known as Winter Storm Heather.

FUEL PROCUREMENT PLANNING AND PROCESSES

Q: PLEASE DESCRIBE HOW THE COMPANY BUYS NUCLEAR FUEL

A: Wolf Creek Nuclear Operating Corporation ("Wolf Creek") purchases uranium and has it processed for use as fuel in its reactor. This process involves conversion of uranium concentrates to uranium hexafluoride, enrichment of uranium hexafluoride and fabrication of nuclear fuel assemblies. As of December 31, 2024, Wolf Creek has on hand or under contract all of the uranium concentrates required for operation **[redacted]** with requirements for the **[redacted]**. The station also has **[redacted]** of the uranium enrichment and conversion services required for operation through **[redacted]** and has under contract all of the uranium fuel rod fabrication services required to operate Wolf Creek **[redacted]**.

Q. PLEASE DESCRIBE HOW EVERGY KANSAS CENTRAL ACQUIRES ITS NATURAL GAS REQUIREMENTS.

A. Evergy Kansas Central's natural gas-fired generation resources are located on the Southern Star Central Gas Pipeline ("SSCGP"), Kansas Gas Service intra-state pipeline ("KGS"), and ONEOK Gas Transportation, L.L.C., pipeline ("OGT"). Evergy Kansas Central's firm capacity continues under contract, as of April 1, 2025 to equal 121,425 MMBtu/day firm production zone capacity and 125,580 MMBtu/day market zone capacity on SSCGP. Evergy Kansas Central procured a seasonal 25,000 MMBtu/day of firm market zone capacity on SSCGP that will end on March 31, 2025 and currently has about 40,000 MMBtu/day capacity on OGT Interruptible Transport Storage. Evergy Kansas Central does not have firm transport on KGS or OGT. If Evergy Kansas Central had to run all its natural gas-fired capacity at once, its Maximum Daily Quantity ("MDQ") would be about 397,000 MMBtu/Day. In the event of a natural gas shortage or other emergency event, some of Evergy Kansas Central's simple cycle gas turbines can operate on #2 diesel. Evergy Kansas Central typically procures physical natural gas on a short-term basis (daily). These physical purchases are from suppliers such as ETC Gas Marketing, Enlink Gas Marketing, Southwest Energy, KOCH Energy Services, Williams Gas Marketing or Spire Marketing.

Q. HOW ARE COAL REQUIREMENTS DETERMINED?

A. As discussed above, Evergy Kansas Central utilizes PROMOD modeling software. It is from PROMOD's generation and fuel burn forecast that Evergy Kansas Central determines the anticipated fuel requirements for its generating units. This forecast is most relevant to determining coal procurement needs as natural gas purchases are typically made on a shorter-term basis based on more operational dispatch forecasts. Pertaining to fuel oil, usage for a given day or hour is typically unpredictable and as such, fuel oil is generally purchased on an as-required basis to replenish onsite oil inventory or to stock up in anticipation of an event such as extreme weather.

Q. PLEASE DESCRIBE HOW EVERGY KANSAS CENTRAL BUYS COAL.

A. Generally, Evergy Kansas Central follows a strategy of laddering into a portfolio of contracts for Powder River Basin ("PRB") coal. Evergy Kansas Central's "laddered" portfolio consists of coal supply contracts which were entered into at different times leading up to the operating year. The closer EKC is to a given operating year, the higher the coal commitment percentage will be as compared to expected requirements. When burn projections increase, actual burns prove to be higher than anticipated, or as otherwise needed, supplemental purchases of coal are made on the spot market.

Q: WHAT DID EKC'S LADDERED PORTFOLIO LOOK LIKE FOR 2024?

A: In January 2024, Evergy Kansas Central had contractual commitments for about ** [redacted] ** percent of its share of expected coal burn requirements at that

time for 2024. It also had commitments for about ** [redacted] ** percent for 2025, ** [redacted] ** percent for 2026, ** [redacted] ** percent for 2027 and ** [redacted] ** percent for 2028.

Q. PLEASE DESCRIBE THE ARRANGEMENTS THAT PROVIDE COAL AND ITS TRANSPORTATION TO YOUR FACILITIES.

A. For operating year 2024, Jeffrey Energy Center, Lawrence Energy Center, and La Cygne Generating Station coal was purchased in the manner discussed above. Each of the three stations received coal under multiple contracts and from multiple mine sources. All Evergy Kansas Central coal facilities burn low sulfur PRB coal that is produced in Wyoming. On occasion La Cygne Unit 1 may utilize bituminous coal to assist with various operational issues or coal pile management, but that bituminous coal is already onsite and in inventory from previous years prior to its transition to 100% PRB coal. There are no plans at this time to purchase any bituminous coal for La Cygne in the future.

In 2024, coal for Jeffrey Energy Center originated at the Black/West Thunder, Cordero, and North Antelope Rochelle Mine ("NARM") in the Southern PRB ("SPRB") region of Wyoming. From the mines, the coal was transported to Jeffrey Energy Center by the Union Pacific Railroad ("UP") under a contract. Coal for Lawrence Energy Center originated at the Black/West Thunder and NARM mines in the SPRB region of Wyoming and was transported to the station by BNSF Railway Company ("BNSF") under tariff service. Finally, 2024 coal for La Cygne Generating Station originated at the Belle Ayr, Black/West Thunder, Caballo, and NARM mines in the

SPRB region of Wyoming. From the mines, the coal was transported to Kansas City by UP, where the trains were then interchanged to the Canadian Pacific Kansas City ("CPKC") railroad for delivery from Kansas City to the station. Both the originating and delivery movements to La Cygne were in contract service. Up until early 2023, the short haul from Kansas City to La Cygne Generating Station had been handled by the Kansas City Southern Railway Company ("KCS"), however Canadian Pacific Railway ("CP") and KCS combined to form CPKC in April 2023.

Q. DO EVERGY KANSAS CENTRAL'S COAL FIRED FACILITIES HAVE COMPETITIVE OPTIONS FOR COAL DELIVERY?

A. Competition for coal transportation service to Jeffrey is very limited. Prior to 2021, the principal coal source for Jeffrey Energy Center was the Eagle Butte mine, which is captive to the BNSF. As a result, transportation to Jeffrey previously required both BNSF and UP movements. Beginning in 2021, coal for Jeffrey Energy Center could be sourced at mines located on the BNSF-UP joint line, such that the coal could be transported via more efficient single line service on UP. Jeffrey Energy Center is served only by UP, however, so at this juncture, there are no further competitive options for the station. Lawrence Energy Center is served only by the BNSF. The rail infrastructure that would have to be installed for either generating facility to provide competitive access to both railroads would be complex to complete and very expensive, with uncertain results.

For La Cygne Generating Station, as explained above, there are two separate rail movements involved in the transportation of coal from Wyoming to the station. The origination portion of the movement (Wyoming to Kansas City) is competitive, as it can be served by either BNSF or UP. The delivery portion of the movement, however, can only be handled by CPKC. Therefore, a portion of La Cygne coal transportation service is competitive, and a portion is not.

Q. PLEASE DESCRIBE EVERGY KANSAS CENTRAL'S FLEET OF RAILCARS USED TO DELIVER COAL.

A. Currently, Evergy Kansas Central has enough equipment to operate as many as eleven train sets to serve Jeffrey and Lawrence, plus spare railcars. As many as eight train sets are available to serve Jeffrey Energy Center and three sets for Lawrence Energy Center.

Q. DOES EVERGY KANSAS CENTRAL LEASE ALL OF ITS TRAIN SETS?

A. No. Evergy Kansas Central both owns and leases railcars. For those leased railcars, the next lease expiration dates are in the last half of 2025. EKC owns a total of 261 railcars or roughly two train sets.

Q. DOES THE COMPANY UPDATE ITS FUEL PROCUREMENT AND PLANNING PROCESS TO ADJUST FOR CHANGES IN THE MARKETPLACE?

A. Yes. EKC routinely reviews fuel market conditions and market drivers. We monitor market data, industry publications and consultant reports in an effort to avoid high prices and to take advantage of lower prices.

Q. DID THE COMPANY MAKE ANY CHANGES TO ITS COAL AND NATURAL GAS PROCUREMENT AND PLANNING PROCESS FOR 2024?

A. Although EKC transitioned to a ladder strategy beginning in 2021, there were some further refinements to the ladder strategy made for 2023 and beyond coal procurement. As shared with KCC Staff in an August 19, 2022 Coal Procurement Strategy Update discussion, these refinements included, among others, **[redacted]**.

While there was volatility in the natural gas market, no change was made to Evergy's gas procurement and planning process as a result. Natural gas is purchased on a short-term (daily) basis and thus the process already enables ongoing adjustments to market conditions each day and no adjustment was required.

SPP INTEGRATED MARKETPLACE VALUE AND IMPLICATIONS

Q. HAS THE SPP IM CHANGED HOW YOU DETERMINE YOUR GENERATION AND FUEL REQUIREMENTS?

A. Yes, as previously discussed, our short-term modeling processes attempt to simulate SPP IM operations and thereby produce a generation and fuel burn forecast for our generating facilities. This allows Evergy Kansas

Central to estimate our fuel requirements to meet expected SPP generation dispatch.

Q. HAS THE SPP IM CHANGED HOW EVERGY KANSAS CENTRAL OPERATES AND MANAGES ITS GENERATION FLEET ON A DAY TO DAY BASIS?

A. Yes, the SPP IM requires Evergy Kansas Central to offer generating units into the daily market to be available to help meet total RTO demand and in turn, Evergy Kansas Central purchases energy from the RTO necessary to meet our customers' load requirements. Based on regional generation needs, the SPP IM may require Evergy Kansas Central to operate facilities we might not run on our own accord to meet our customers' load obligation or require EKC to reduce generation at facilities we might otherwise operate at higher capacities had they been dispatched by Evergy Kansas Central alone. These SPP operating and dispatching requirements are derived from a least cost generation modeling solution based on loads by area, available generation, transmission constraints, fuel prices, environmental constraints, wind generation availability and other power plant operating criteria.

Q. HOW DOES THE SPP IM IMPACT FUEL & PURCHASE POWER COSTS?

A. As the Consolidated Balancing Authority ("CBA"), SPP determines the generation that will be committed and dispatched for an operating day to serve the load of the market. Those commitments and dispatches for Evergy Kansas Central resources drive fuel costs. However, the revenue

received from the market for that generation goes to offset the purchase power costs associated with serving the Evergy Kansas Central load.

Q. HOW DOES THE SPP IM DETERMINE HOW UNITS WILL BE COMMITTED AND DISPATCHED?

A. The SPP IM uses a sophisticated algorithm to determine the most economical mix of generation required to meet the combined SPP load requirement. This algorithm considers many factors beyond the fuel cost of individual generation units. The algorithm calculates the all-in unit costs that include start-up costs, minimum runtime, unit heat rates at various output levels, environmental constraints, transmission constraints, and many other factors. This calculation allows SPP to determine the optimal blend of generation resources to meet SPP members' load, regardless of the unit owner, and to best utilize the transmission system to meet the load requirements of all member utilities. The results achieved by the SPP's modeling and dispatching capabilities utilizing all the region's generating resources would not have been possible prior to the SPP IM.

Q: PLEASE DESCRIBE HOW THE SPP IM PROVIDES VALUE TO YOUR CUSTOMERS.

A. The SPP IM provides Evergy Kansas Central and other SPP member companies opportunities for either enhanced revenues or economic purchases such as energy and ancillary services. A benefit of the SPP IM is the enhanced ability of the SPP to dispatch energy and ancillary services

from the most economical resources of all SPP members on a sub-hourly basis.

Q. ARE THESE REVENUE STREAMS AND COST SAVINGS PASSED ON TO EVERGY KANSAS CENTRAL'S CUSTOMERS?

A. Yes. Our customers receive the benefits of the SPP dispatch savings and generating revenue offsets through the RECA.

Q. DO YOU HAVE ANY OTHER COMMENTS RELATED TO THE EFFICIENCY OF THE SPP MARKET?

A. Yes. An important point to consider is all SPP member utilities and generating companies are required to fully participate in the sale of generation and the purchase of load. Prior to the SPP IM, generation resources and utilities were not required to buy from or sell electricity to other SPP members. Under the SPP IM, all SPP member companies are now required to offer and sell electricity from their generating units into the SPP IM, ensuring the most economical blend of resources are available to the SPP member utilities. Again, this would not be possible without the SPP IM.

Q: HAS THE COMPANY PERFORMED ANY ANALYSIS OF THE SPP IM'S BENEFIT FOR EVERGY KANSAS CENTRAL CUSTOMERS?

A: Yes. A full, in-depth cost-benefit analysis is beyond the scope of the Company's resources to produce. However, consistent with the approach utilized for the Evergy Metro analysis, a study that focuses on the single market benefit associated with the CBA in the SPP IM structure was

conducted to provide a sense of the benefit that the SPP IM has provided. It should be noted that this study is not able to quantify the many other benefits of the SPP IM such as increased transmission construction, improved settlements, and wind generation improvements etc. However, the study looked at the resulting Locational Marginal Pricing ("LMP") for Evergy Kansas Central's native load improvement as a proxy for the cost/benefit to serve native load by participating in the SPP IM.

Q: PLEASE DESCRIBE HOW THE ANALYSIS WAS CONDUCTED.

A: The analysis attempts to compare and quantify the effect of Evergy Kansas Central's load and generation being balanced by the CBA as a member of the SPP IM as compared to existing outside of SPP as a stand-alone Balancing Authority ("BA"). Two PROMOD based simulations for calendar year 2024 were performed:

- Simulation 1: Assumes the SPP IM market with CBA for all of SPP for the entire year.
- Simulation 2: Assumes Evergy entities operate as a stand-alone BA outside of the SPP IM for the full year.

To calculate the benefit, the Evergy Kansas Central LMP in each simulation was compared and the change in the cost to serve native load for Evergy Kansas Central was valued.

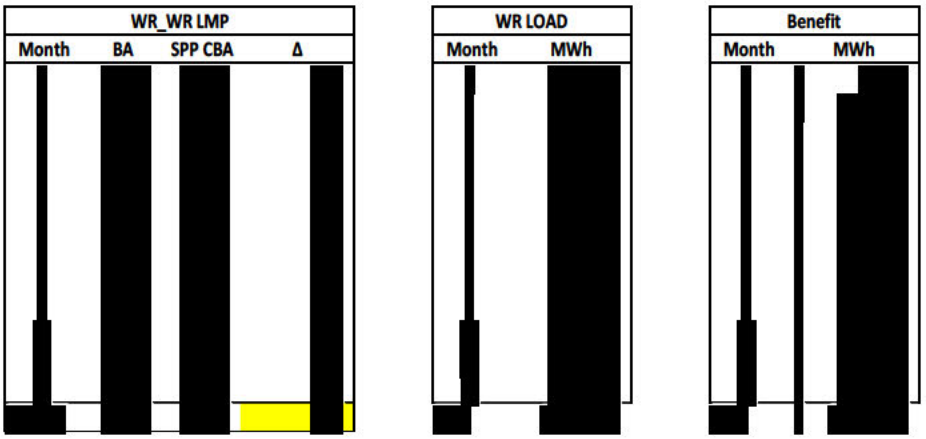
The final results estimate a benefit of ** [redacted] ** for customers as shown in the Confidential Schedule JLT-1; however as discussed above, this is not inclusive of the many other benefits that the SPP IM provides.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does. Thank you

SCHEDULE JLT-1

WR 2024 Load Price



STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

VERIFICATION

Jessica Tucker, being duly sworn upon her oath deposes and states that she is the Sr Manager Fuels and Emissions, for Evergy, Inc., that she has read and is familiar with the foregoing Direct Testimony, and attests that the statements contained therein are true and correct to the best of her knowledge, information and belief.

Jessica Tucker

Subscribed and sworn to before me this 20th day of March 2025.

Notary Public

My Appointment Expires: May 30, 2026

NOTARY PUBLIC - State of Kansas
LESLIE R. WINES
MY APPT. EXPIRES 5/30/2026