**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

DIRECT TESTIMONY OF

KIRKLAND B. ANDREWS

ON BEHALF OF EVERGY METRO, INC., EVERGY KANSAS CENTRAL, INC. AND EVERGY KANSAS SOUTH, INC.

IN THE MATTER OF THE APPLICATION OF EVERGY KANSAS METRO, INC., EVERGY KANSAS SOUTH, INC. AND EVERGY KANSAS CENTRAL, INC. TO MAKE CERTAIN CHANGES IN THEIR CHARGES FOR ELECTRIC SERVICE PURSUANT TO K.S.A. 66-117.

Docket No. 23-EKCE-775-RTS

April 25, 2023

I. INTRODUCTION

Q. Please state your name and business address.

A. Kirkland B. Andrews. My business address is 1200 Main, Kansas City, Missouri 64105.

Q. By whom and in what capacity are you employed?

A. I am employed by Evergy Metro, Inc. I serve as Executive Vice President and Chief Financial Officer for the operating utilities of Evergy, Inc. ("Evergy"). They are Evergy Metro, Inc. d/b/a/ Evergy Kansas Metro ("EKM"); Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (collectively d/b/a as "EKC"); Evergy Metro, Inc. d/b/a Evergy Missouri Metro; and Evergy Missouri West, Inc. d/b/a Evergy Missouri West.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of EKM and EKC (collectively the "Company" or "Companies") in this proceeding.

Q. What are your responsibilities with Evergy?

A. I am responsible for all corporate financial functions, which include treasury, accounting, financial planning, tax, capital allocation, investor relations, risk management, development of renewable and conventional assets, and supply chain management.

Q. Please describe your education, experience, and employment history.

A. I hold a Bachelor of Arts degree in Philosophy from Wake Forest University and a Master of Business Administration degree from the University of Virginia's Darden School of Business. I joined Evergy and its operating utilities in February of 2021. I had served on Evergy's Board of Directors for 11 months prior to that time. From 2011 until early 2021, I served as Executive Vice President and Chief Financial Officer of NRG Energy, Inc. During that period, I was also a director of NRG Yield, Inc. (2012-2018) and served as

Executive Vice President and Chief Financial officer of NRG Yield (2012-2016). Before joining NRG, I was Managing Director and Group Head of Power & Utilities Investment Banking for the Americas at Deutsche Bank (2009-2011). I previously served as Group Head of North American Power and Utilities (2007-2009) and Head of Power and Utilities Mergers and Acquisitions (2005-2007) at Citigroup.

Q. Have you previously testified in a proceeding before the Kansas Corporation Commission ("Commission" or "KCC") or before any other utility regulatory agency?

A. I have not testified before the KCC but I have filed written testimony in proceedings before the Missouri Public Service Commission ("MPSC").

Q. What is the purpose of your testimony?

A. My testimony: (a) supports and explains the importance of the proposed Return on Equity ("ROE") for EKM and EKC and their customers; (b) identifies and quantifies the cost of debt for each company; (c) describes and supports their respective capital structures; (d) discusses the financial and ring-fencing commitments made in the Company's 2018 merger and how the Company's cost of capital reflects those commitments; and (e) calculates and supports the weighted average cost of capital for each company.

II. RETURN ON EQUITY

Q. What ROE is requested by EKC and EKM?

A. Both companies request an ROE of 10.25 percent.

Q. What is the basis of the Companies' proposed ROE?

A. A primary basis of each Company's recommendation is the detailed assessment and quantification of the cost of equity for the Companies prepared by Company witness Ann Bulkley. This assessment included careful consideration of capital market conditions, the evaluation of a group of utilities comparable to the Companies, the use of various ROE estimation models, specific evaluation of each Companies' business risks, and consideration of recent regulatory decisions. Based on this work, Ms. Bulkley determined that the reasonable ROE range for both EKM and EKC is 9.90 percent to 11.00 percent. The Company's proposal is in bottom third of the range proposed by Ms. Bulkley. The request for an ROE of 10.25 percent is also informed by our experience with our investors, equity analysts, and credit rating agencies, and seeks to balance the objectives of affordability and regional rate competitiveness with the need to fairly and adequately compensate our shareholders for their investment in the Companies while ensuring the Companies maintain access to the reasonably priced capital necessary to support infrastructure investments in Kansas and serve our customers well.

Q. Why do you believe the same ROE is warranted for both Companies?

A. As discussed by Company witness Ann Bulkley in her direct testimony, the business, financial, operating, and regulatory risk for EKM and EKC are comparable. Likewise, the results of her ROE estimation models for each company are comparable. Based on my own knowledge of the two companies as well as Ms. Bulkley's analyses, I agree the same ROE should be approved for EKM and EKC at this time.

Q. In the most recent general rate cases decided in the latter part of 2018, the KCC approved settlement agreements incorporating a 9.3 percent ROE. Have capital market conditions changed since 2018?

A. Yes, there have been significant changes in capital markets and the cost of capital since the Companies' last rate cases. Importantly, the settlement agreements in those cases preceded (1) the COVID-19 pandemic and the unprecedented monetary and fiscal response to the pandemic and its impact on the economy, and (2) the persistently high inflation and the Federal Reserve's resulting tighter monetary policy in the last year. While interest rates initially decreased following the settlement agreements in 2018 and reached record lows in 2020 at the outset of the COVID-19 pandemic, interest rates are now dramatically higher than they were in 2018. In response to inflationary pressures, the Federal Reserve has increased the federal funds rate *nine* times since 2022 and as a result, the current federal funds rate is at its highest level in over 15 years and approximately three times the fed funds rate during the first half of 2018. Moreover, as shown in Figure 4 of Ms. Bulkley's testimony, since the Companies' last rate cases both the target federal funds rate and the inflation rate have more than doubled and both are expected to remain relatively high.

Q. What does this mean for the Companies' cost of capital and the ROE requested in this case?

A. Utility equity investors rely on dividends, which represent "current return" reflected as dividend yield, as a key component of their total return expectation when making investment decisions. Investors also recognize that the capital-intensive nature of utilities requires that they frequently issue debt to fund a meaningful component of capital investment. As a result, utility stocks are highly sensitive to both inflation expectations and interest rates and, as Ms. Bulkley explains, utility stock prices are inversely correlated to interest rates. If investors expect inflation and interest rates to remain relatively high, they will require higher returns to compensate them for that increased risk.

As the federal reserve began to more meaningfully increase rates during 2022, yields on longer dated US government securities such as the 10 year treasury also moved higher representing an increase in the longer term opportunity cost for relatively risk-free return. Riskier securities such as equities, in particular those with greater sensitivity to interest rates such as utilities, must offer greater return to compensate investors relative to that risk free opportunity. As those lower risk treasury returns increased, we saw forward utility earnings multiples, the inverse of which is earnings yield (a proxy for the expected return), fall by approximately 15-20% over the past year, suggesting an increase in the cost of equity for utilities. For Ms. Bulkley's proxy group, specifically, the average forward P/E declined by more than 15% between August 22, 2022 and March 31, 2023. The corresponding increase in earnings yield represented by the decrease in multiples means that equity investors require that the Company's earnings and cashflow represent a higher percentage of or return on the equity capital they invest – a direct indication of the cost of equity capital rising for utilities.

Figure 1: Forward P/E Ratios[1]

[1] Source: S&P Capital IQ. Average forward P/E ratio for Ms. Bulkley's proxy group. Forward P/E ratio defined as the Price/Next Twelve Months Earnings Per Share ("EPS").

Q. Are there additional measures that indicate the cost of equity has increased for electric utilities?

A. Yes. One of the models used by Ms. Bulkley in her cost of equity analysis uses "Beta" coefficients to measure the risk of the proxy group, which represents the Companies' risk relative to the broader market. As demonstrated by Ms. Bulkley, Beta coefficients for the proxy group have increased substantially since 2018 providing direct market evidence of an increase in cost of equity for electric utilities, and the Companies.

Q. Please discuss how an ROE of 10.25 percent balances the objectives of affordability and regional rate competitiveness with the need to fairly and adequately compensate investors.

A. As discussed by Company witness David Campbell, the Company's core objective is to provide affordable, reliable and sustainable utility service to our customers. We are also committed to maintaining our regional rate competitiveness and have worked successfully to deliver rate reductions and rate credits to our customers since the merger in 2018. Beyond the cost reductions enabled by the merger, we have driven further operating efficiencies for the combined company leading to incremental cost savings which in this rate case we will pass on to our Kansas customers helping offset the impact of rising capital costs. This is our first rate case since 2018 and as discussed by Company witness Darrin Ives, our proposed rates reflect increases below the annualized rate of inflation since our last rate case. However, given nearly five years of investments made to serve our customers, we acknowledge that our requested rate increases will appropriately receive rigorous review. The need to fairly and adequately compensate our investors in order to maintain our access to capital to enable the essential investments necessary to serve our customers well is also an essential element of this rate proceeding. Our proposed ROE in the bottom third of the reasonable range supported by Ms. Bulkley balances these considerations.

Q. Please explain why the ROE authorized in this proceeding is critical to the Company and its ability to attract capital at reasonable terms.

A. The Company relies heavily on external capital from investors to fund its operations and invest in critical infrastructure to serve our customers. As a regulated utility with an obligation to serve no matter the economic or financial market environment, we require continuous access to external capital in order to meet our obligation. However, capital is finite, and investors have options. They seek the maximum return for an investment of similar risk. Therefore, if another utility of similar risk to the Company has the ability to invest its capital at a higher return viewed by investors as more reflective of the current and expected market conditions, that utility represents a more attractive investment and as such, investors will choose that alternative. To the extent the Kansas regulatory environment is perceived as more challenging relative to other jurisdictions, investors will allocate capital to utilities in more constructive jurisdictions, which may limit the Company's options and increase its costs when it needs to access the capital markets.

As Ms. Bulkley explains, the regulatory environment is among the most important factors investors consider when considering a utility investment, as it is a significant driver of earnings and cash flow. Regulatory decisions regarding the authorized ROE and capital structure directly affect the Company's internal cash flow generation, and therefore the financial metrics reviewed by ratings agencies in their ratings assessments. Investors and rating agencies understand that regulatory orders regarding appropriate return on equity and capital structure are critical to utilities' credit and financial integrity, which can be challenged in uncertain and stressed market conditions. Because we must serve our customers each and every day and capital is a critical component enabling that service, over the longer term the Company's financial profile must be sufficiently strong to withstand adverse, uncertain events beyond our control.

Q. What are the consequences to the Company of a regulatory environment that investors perceive as more challenging?

A. We will be viewed as a riskier investment and investors will require higher returns to compensate them for taking on that additional risk. Equity analysts carefully monitor and assess utilities' regulatory environments, which directly inform their valuation estimates. For example, UBS currently ranks Evergy as a "fourth quartile regulator ranking,"[2] and applies a 10% discount to Evergy's valuation multiple due to regulatory risk. As I mentioned earlier in my testimony, a lower P/E multiple means that the Company's earnings and cashflow represent relatively higher percentages of invested equity capital versus other utilities. The 10% discount relative to comparable group P/E multiples suggests a higher cost of equity relative to peer utilities due to Evergy's higher risk regulatory environment.

As discussed by Ms. Bulkley, utilities that operate in more challenging regulatory environments have lower credit ratings and higher costs of both debt and equity, all else equal. Ultimately customers bear these costs. Further, these factors may result in constrained access to capital, particularly during adverse market environments. This outcome does not serve customers' best interests.

[2] UBS, Evergy, Inc., Entering Key Regulatory Phase, February 27, 2023.

Q. Given the current economic environment, wouldn't adopting a low ROE be in the best interests of customers?

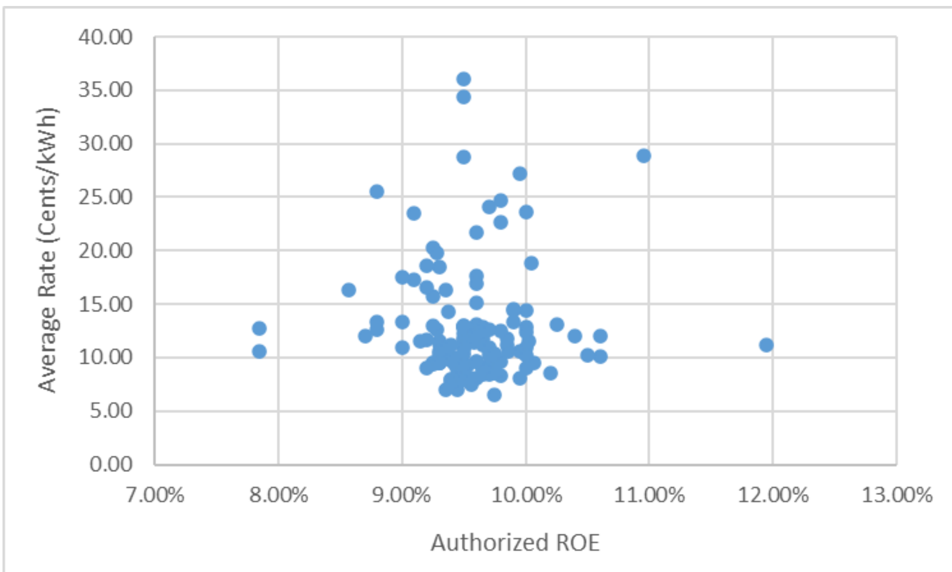
A. No. While I appreciate that one might consider that adopting a below average return is in customers' best interest to mitigate rate increases, this view is short-sighted and does not benefit customers in the longer-term. A 100-basis point reduction in the Company's proposed ROE, all else equal, would reduce the total retail revenue requirement reflected in customer rates by approximately 2%. In exchange for this near-term savings in customer rates, the Company's risk profile would increase and customers would be exposed to significant risk and ultimately higher capital costs. That same 100 basis point reduction would imply an approximate 3.5% reduction in operating cashflow, which is a meaningful reduction in financial flexibility and thus a corresponding increase in financial risk.

Utilities are capital intensive businesses that require continuous access to capital, no matter the economic and capital market environment. Our capital needs are driven by our obligation and commitment to customers and the investments necessary to serve them well. As the need for investment to ensure reliable and affordable service to customers is ongoing, we cannot time our capital needs to occur during only favorable markets. It is critical that we maintain a consistently strong financial profile and an authorized ROE reflective of the current and expected market environment is essential to ensuring our ability to access capital on reasonable terms to fund infrastructure investments necessary to serve our customers consistently and cost-effectively on a sustained long-term basis. The absolute lowest rates today should not be the only measure of customers' interests. It is clearly in our customers' best long-term interests to be served by a utility with consistent financial capacity and strength to provide, safe and reliable service at affordable rates, now and in the future.

Q. Do lower authorized ROEs result in lower rates for customers?

A. Because the rates customers pay are a function of many variables, lower authorized ROEs do not necessarily result in lower rates for customers. As shown in Figure 2 below, there is no clear relationship between authorized ROEs and rates.

Figure 2: Relationship Between Current Authorized ROEs and 2021 Average Electric Rates[3]



Q. Do you have any additional comments regarding the ROE?

A. As I explained earlier, the Company's core objective is to provide affordable, reliable and sustainable utility service to our customers. To do so, we require the ability to access capital on a continuous basis. To ensure that we can access capital at low costs and reasonable

[3] Data sources: U.S. Energy Information Administration, Electric Sales, Revenue, and Average Price (2021), Table 10 - All Sectors, https://www.eia.gov/electricity/sales_revenue_price/; Regulatory Research Associates, excludes electric utilities that have not had an ROE determination in the last ten years.

terms requires that we maintain a strong financial profile. Maintaining a strong financial profile requires reasonable ROEs, appropriate capital structures, and a long view as to the financial well-being of the utility and the benefits of such to customers.

In my role as CFO, I frequently interact with the financial and investment community. Investors value predictable, stable, and constructive regulatory environments. They are keenly focused on the regulatory environment in which we operate and how it affects the risks and prospects of the Company and therefore their investment. They are also well-aware of how our regulatory environment compares to others. The ROEs and capital structures authorized in this proceeding are important signals to investors regarding the constructiveness of our regulatory environment and directly affect our ability to cost-effectively serve our customers.

III. <u>COST OF DEBT</u>

Q. What is the cost of debt to be used to determine the weighted average cost of capital for each company?

A. The cost of debt is 4.37 percent for EKM and 4.35 percent for EKC as presented on **Exhibits KBA-1** and **KBA-2,** respectively.

Specifically, the actual and projected long-term debt issuances and costs through June 30, 2023, and the calculation of the projected weighted average cost of debt for EKM is shown on **Exhibit KBA-1**, p. 1. The actual long-term debt issuances and costs at the end of the test year as well as the calculation of the resulting weighted average cost of debt for EKM appear on **Exhibit KBA-1**, p. 2. For EKC, the equivalent listings and calculations are presented on **Exhibit KBA-2**, pp. 1-2. The projected cost of debt is based on the expected cost of debt as of June 30, 2023.

Q. Will the Company update the cost of debt during this proceeding?

A. Yes. We will update the cost of debt to reflect each company's actual cost of debt as of June 30, 2023.

Q. Is the Company's average cost of debt reasonable?

A. Yes. Company witness Ann Bulkley performed an analysis to determine the reasonableness of EKM's and EKC's cost of long-term debt. Her review and analysis demonstrate that the proposed cost of debt is reasonable.

IV. FINANCIAL MERGER COMMITMENTS

Q. Earlier you noted that the Settlement Agreement ("Merger Settlement Agreement") approved by the Commission in Docket No. 18-KCPE-095-MER ("18-095 Docket") contains specific financial or ring-fencing commitments. Please identify the financial merger commitments.

A. The financial and ring-fencing commitments contained in the Merger Settlement Agreement approved by the Commission in its Order in the 18-095 Docket ("Merger Order") are identified in items number 8 through 17 in Attachment 1 of the Merger Settlement Agreement.

Q. Did the Merger Order and Merger Settlement Agreement address the Companies' capital structure?

A. Yes. The Merger Order noted that a key term of the Merger Settlement Agreement was that, "Holdco, KCPL&L, and Westar will maintain separate capital structure and separate debt."[4] In particular, the Merger Settlement Agreement provides:

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[4] Evergy Inc. was identified as "Holdco" in the Settlement Agreement and the former Westar and Kansas City Power & Light ("KCP&L") entities were identified as the Companies.

Capital Structures: Holdco, KCP&L and Westar shall maintain separate capital structures to finance the activities and operations of each entity. Holdco, KCP&L and Westar shall maintain separate debt. Holdco, KCP&L and Westar shall also maintain separate preferred stock, if any. Holdco, KCP&L and Westar shall use reasonable and prudent investment grade capital structures. KCP&L and Westar will be provided with appropriate amounts of equity from Holdco to maintain such capital structures.

The Merger Settlement Agreement further states:

Cost of capital: Holdco commits that future cost of service and rates of KCP&L and Westar shall not be adversely impacted on an overall basis as a result of the Merger and that *future cost of service and rates will be set commensurate with financial and business risks attendant to their individual regulated utility operations*. Neither KCP&L nor Westar shall seek an increase to their cost of capital as a result of (i.e., arising from or related to) the Merger or KCP&L's and Westar's ongoing affiliation with Holdco and its affiliates after the Merger. [emphasis added]

Q. Did the Merger Settlement Agreement address the Companies' debt and credit ratings?

A. Yes. The Companies were required to maintain separate debt and credit ratings.

Separate Debt: Holdco, KCP&L and Westar shall maintain separate debt so that Westar will not be liable (directly or through guarantees, cross-defaults or other provisions) for the debts of Holdco, KCP&L, or GMO or other subsidiaries of Holdco (excluding Westar and subsidiaries of Westar), and KCP&L, GMO and other subsidiaries of Holdco (excluding Westar and subsidiaries of Westar) will not be liable (directly or through guarantees, cross-defaults or other provisions) for the debts of Westar. For the avoidance of doubt, consistent with past practice, Westar may guarantee certain obligations of its subsidiaries, and subsidiaries of Westar may guarantee certain obligations of Westar.

Holdco, KCP&L, and Westar shall also maintain adequate capacity under revolving credit facilities and commercial paper, if any, which capacity may be administered on a combined basis provided that capacity maintained for KCP&L and Westar shall be exclusively dedicated to the benefit ofKCP&L and Westar, pricing is separated by entity, and that (i) Westar neither guarantees the debt of Holdco, KCP&L, GMO or other subsidiaries of GPE (excluding Westar and subsidiaries of Westar) nor is subject to a cross-default for such debt and (ii) Holdco, KCP&L, GMO and other subsidiaries of GPE (excluding Westar and subsidiaries of Westar) neither guarantee the debt of Westar nor are subject to a cross-default for such debt.

Credit Rating: Holdco, KCP&L and Westar shall maintain separate issuer (i.e., Corporate Credit Ratings) and separate issue ratings for debt that is publicly placed.

Q. Please highlight the other financial commitments agreed to in the Merger Settlement Agreement and approved in the Merger Order.

A. Other financial commitments include:

Separation of Assets: Holdco commits that KCP&L and Westar will not commingle their assets with the assets of any other person or entity, except as allowed under the Commission's Affiliate Transaction statutes or other Commission order. Holdco commits that KCP&L and Westar will conduct business as separate legal entities and shall hold all of their assets in their own legal entity name unless otherwise authorized by Commission order. Holdco, KCP&L and Westar affirm that the present legal entity structure that separates their regulated business operations from their unregulated business operations shall be maintained unless express Commission approval is sought to alter any such structure.

Cost of Capital: The return on equity capital ("ROE") as reflected in Westar's and KCP&L's rates will not be adversely affected as a result of the Merger. Holdco agrees the ROE shall be determined in future rate cases, consistent with applicable law, regulations and practices of the Commission.

The burden of proof that any increase to the cost of capital is not a result of the Merger shall be borne by KCP&L or Westar. Any net increase in the cost of capital that KCP&L or Westar seeks shall be supported by documentation that: (a) the increases are a result of factors not associated with the Merger or the post-Merger operations of Holdco or its non-KCP&L and non-Westar affiliates; (b) the increases are not a result of changes in business, market, economic or other conditions caused by the Merger or the post-Merger operations of Holdco or its non-KCP&L and non-Westar affiliates; and (c) the increases are not a result of changes in the risk profile of KCP&L or Westar caused by the Merger or the post-Merger operations of Holdco or its non-KCP&L and non-Westar affiliates. The provisions of this section are intended to recognize the Commission's authority to consider, in appropriate proceedings, whether this Merger or the post-

Merger operations of Holdco or its non-KCP&L and non-Westar affiliates have resulted in capital cost increases for KCP&L or Westar.[5]

Q. What was the purpose of these ring-fencing conditions?

A. The purpose of these ring-fencing provisions was to isolate the regulated operating utilities from any potential financial risk that might occur at the holding company and keep financing activities separate.

Q. Has the Company satisfied and upheld these merger conditions?

A. Yes, it has. Company witness Darrin Ives addresses how the Company complied with the merger conditions.

Q. Are Evergy, Inc., EKC, and EKM separate legal entities?

A. Yes. Since the merger, the Company affirms it has maintained separate legal entity structure that separates the regulated business operations of EKC and EKM from Evergy, Inc. and its unregulated operations. Further, the assets owned by each entity are held within each respective legal entity.

Q. Are Evergy, Inc., EKC and EKM independently rated with separate issuer credit ratings and is each debt issuance that is publicly placed separately rated?

A. Yes. Table 1 below shows the issuer (or corporate) credit ratings of each entity.

[5] Docket No. 18-KCPE-095-MER, Non-Unanimous Settlement Agreement, Attachment 1, Signatories' Proffered Merger Commitments and Conditions, Condition Nos. 10, 11, 13, 15, 17.

Table 1: Issuer Credit Ratings

Entity	S&P	Moody's
Evergy Inc.	A-	Baa2
EKC	A-	Baa1
Evergy Kansas South	A-	Baa1
EKM	A-	Baa1

Exhibits KBA-1 and **KBA-2** provide a list of each outstanding debt issuance by legal entity. As noted above in Table 1, each entity has separate credit ratings, and **Exhibits KBA-1** and **KBA-2** clearly show that each legal entity issues its own debt.

Q. Do EKC and EKM maintain separate capital structures from the parent Evergy, Inc.?

A. Yes, they do. Each regulated entity maintains separate capital structures, and we are requesting separate capital structures for each entity in this proceeding. Moreover, I can confirm that no new debt capital raised at the holding company since our last rate proceeding has been used to fund either the equity or debt capital needs of EKC or EKM.

Q. Do the Companies' requested ROE and capital structures comply with the merger conditions described above?

A. Yes, they do. First, our revenue requirement reflects the actual capital structure for each entity in this proceeding, which is consistent with the merger conditions. Each entity issues its own debt and maintains its own credit rating. Further, the capital structures for both EKC and EKM are sufficient for an investment grade rating and, as Ms. Bulkley explains, these capital structures are generally consistent with the capital structures of her proxy group.

The Companies' ROE and overall cost of capital has not been adversely impacted by the merger. Ms. Bulkley explains that her recommended ROE range is the result of her detailed analysis of market-based data applied to widely used financial models consistent with applicable law, regulations, and practices of the Commission and is commensurate with the financial and business risks attendant to the Companies' regulated utility operations. Further, Ms. Bulkley discusses significant recent changes in capital market conditions – including higher inflation and higher interest rates – as a factor supporting her recommended ROE range. These general market and macroeconomic changes are not caused by the merger or post-merger operations of the Company or Evergy, Inc., but rather are factors affecting the utility sector broadly.

V. CAPITAL STRUCTURE OF EKM AND EKC

Q. What is the capital structure for each company?

A. The capital structure components for EKM are 48.00 percent long-term debt and 52.00 percent common equity. For EKC the components are 47.9624 percent long-term debt and 52.0376 percent common equity. The requested capital structure components are based on June 30, 2023 projections. The end-of-test-year capital components as well as the June 30, 2023 projections are shown on **Exhibits KBA-1** and **KBA-2**. The long-term debt and equity ratios will be updated to reflect the actual capital structure for each Company as of June 30, 2023.

Q. How do the Companies' actual capital ratios compare to the ratios approved by the KCC in the 2018 general rate cases[6]?

A. The requested capital ratios in this case are reasonably consistent with those approved by the KCC in the 2018 cases. EKC's current authorized capital ratios are 48.5427 percent long-term debt and 51.4573 percent common equity. For EKM the approved capital ratios were 50.91 percent long-term debt and 49.09 percent common equity.

Q. Please explain how the Company maintains its capital structure.

A. We continually evaluate and manage the capital structure to optimize our strategy over the long-term for the timing of financing, capital plans, and rating agency views. We not only consider a historical view, but also look forward as we consider these factors in order to maintain a strong balance sheet and protect our current credit rating to ensure consistent and reliable access to competitively priced debt capital which is good for customers in the long-term.

Q. Did Staff specifically consider the Company's capital structure in its recommendations in the 2018 general rate case?

A. Yes. During the pendency of the 2018 rate cases, the merger of Great Plains Energy, Inc. and Westar, Inc. was approved by the Commission in the 18-095 Docket. As I discussed above in the preceding section of my testimony, the Merger Settlement Agreement approved by the Commission included specific financial "ring-fencing" conditions related to cost of capital and capital structure. In Westar's 2018 rate case, Staff reviewed the merger conditions and concluded that EKC's capital structure as updated for more recent data during the proceeding complied with the provisions of the Merger Settlement

[6] KCP&L's 2018 rate case was Docket No. 18-KCPE-480-RTS and Westar's was 18-WSEE-328-RTS.

Agreement.[7] In KCP&L's 2018 rate case, Staff made no adjustments to EKM's updated capital structure and concluded that it also complied with the provisions of the Merger Settlement Agreement.[8] The Commission approved settlement agreements in both rate cases which reflected each company's individual and separate capital structure consistent with Staff's recommendations in those dockets.

Q. How does the capital structure affect the cost of equity?

A. An appropriately designed capital structure should enable the Company to consistently maintain its financial integrity, thereby facilitating access to capital at competitive rates under a variety of economic and financial market conditions. Capital structure relates to financial risk which is a function of the percentage of debt relative to equity and is often referred to as financial leverage. As financial leverage increases, so do the fixed obligations for the repayment of that debt and the associated interest payments which increases the risk that cash flows may not be sufficient to meet those obligations on a timely basis. Since the capital structure can affect a company's overall level of risk, it is an important consideration in establishing a just and reasonable rate of return. Therefore, it is relevant to consider capital structure in light of industry practice and investor requirements.

Q. Is there any reason for the Commission to consider any alternative capital structures to the Companies' actual, stand-alone capital structure?

A. No. As Company witness Ann Bulkley testifies, the Companies' capital structures are reasonable and squarely within the range of peer company capital structures. Further, the

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[7] Docket No. 18-WSEE-328-RTS Direct Testimony of Adam Gatewood, at 11.
[8] Docket No. 18-KCPE-480-RTS Direct Testimony of Adam Gatewood, at 9.

Merger Settlement Agreement and Merger Order clearly provide that the Companies maintain separate capital structures, debt and credit ratings, among other things.

VI. CONCLUSION AND OVERALL RATE OF RETURN

Q. Please summarize the overall rate of return requested for each company.

A. The requested capital structure components and overall rate of return are presented in Table 2 for EKM is presented and in Table 3 for EKC.

Table 2: Overall Rate of Return – EKM

Source	Ratio	Cost	Weighted Cost
Long-Term Debt	48.00%	4.3718%	2.0987%
Common Equity	52.00%	10.25%	5.3295%
Total	100.00%		7.4282%

Table 3: Overall Rate of Return – EKC

Source	Ratio	Cost	Weighted Cost
Long-Term Debt	47.9624%	4.3472%	2.085%
Common Equity	52.0376%	10.25%	5.3339%
Total	100.00%		7.4189%

Q. Do you have any concluding comments?

A. Yes. I wish to emphasize that the Company's proposed ROE of 10.25 percent is in the lower third of the reasonable range of ROE's estimated by Ms. Bulkley. As Ms. Bulkley explains, capital market conditions have changed dramatically since our last rate cases in 2018 and the cost of capital for utilities has increased substantially. Our proposal reflects these very real changes in the cost of equity while meeting the objective of affordability by requesting an ROE in the lower third of the reasonable range.

The Companies' cost of debt and capital structures are reasonable and consistent with the peer utilities as explained by Ms. Bulkley.

Finally, the ROEs and capital structures are commensurate with financial and business risks attendant to the individual regulated utility operations, consistent with the financial conditions pursuant to the Merger Settlement Agreement that require (a) separate, reasonable and prudent investment grade capital structures, (b) separate debt, and (c) separate issuer and debt issue credit ratings.

Taking account of current market conditions and the significant changes in financial markets since 2018 reflects the appropriate consideration of factors that inform a rigorous review of ROE and capital structure. The requested ROE and capital structure are just and reasonable and will help to ensure our ability to consistently and cost-effectively secure the capital necessary to make investments to provide our customers with safe, reliable and affordable service. In my opinion, the requested ROE and capital structure will serve customers' best interests over the long term and enable access to capital on reasonable terms to fund infrastructure investments to meet our customer obligations and to ensure that we maintain a healthy and financially strong utility.

For these reasons, I would respectfully urge the KCC to approve the ROEs, capital structures, and overall costs of capital requested by EKM and EKC in this case.

Q. Does this conclude your testimony?

A. Yes, it does.

Evergy Kansas Metro Electric Utility

Capital Structure and Rate of Return

Projected June 30, 2023

Long-Term Debt

	Balance	Weight	Rate	Rate of Return
Long-term Debt*	2,926,400,750	48.00%	4.3718%	2.0987%
Common Equity	3,169,665,643	52.00%	**10.2500%**	5.3295%
Total Capitalization	**6,096,066,393**	**100.00%**		**7.4282%**

*Includes unamortized debt expenses and discounts. There are no current maturities of long-term debt

Long-Term Debt

Description	Date of Settlement	Date of Maturity	Interest Rate	Principal Amount of Issue	Net Proceeds	Yield to Maturity	Outstanding Debt Capital	Cost of Debt	Net Premium, Discount & Expense	Net Proceeds Percent of Original Issue
2015 Sr. Notes 3.65% Due 2025	08/18/15	08/15/25	3.6500%	350,000,000	345,790,906	3.7957%	350,000,000	13,284,994	4,209,094	98.797402%
2020 GMB 2.25% Due 2030	05/26/20	06/01/30	2.2500%	400,000,000	396,180,825	2.3576%	400,000,000	9,430,220	3,819,175	99.045206%
2005 La Cygne EIRR Bonds 4.650% Due 2035	09/01/05	09/01/35	4.6500%	21,940,000	21,379,303	4.8118%	21,940,000	1,055,717	560,697	97.444407%
2005 Burlington EIRR Bonds 4.650% Due 2035	09/01/05	09/01/35	4.6500%	50,000,000	48,662,914	4.8195%	50,000,000	2,409,748	1,337,086	97.325828%
2007A Burlington EIRR Variable Due 2035	09/19/07	09/01/35	3.6600%	73,250,000	72,288,211	3.7360%	73,250,000	2,736,627	961,789	98.686977%
2007B Burlington EIRR Variable Due 2035	09/19/07	09/01/35	3.6600%	73,250,000	72,288,211	3.7360%	73,250,000	2,736,627	961,789	98.686977%
2005 Sr. Notes Series B 6.05% Due 2035	11/17/05	11/15/35	6.0500%	250,000,000	246,235,946	6.1607%	250,000,000	15,401,637	3,764,054	98.494378%
2008 Missouri EIRR 3.50% Due 2038	05/22/08	05/01/38	3.5000%	23,400,000	22,514,017	3.7104%	23,400,000	868,235	885,983	96.213746%
2011 Sr. Notes 5.30% Due 2041	09/20/11	10/01/41	5.3000%	400,000,000	393,432,638	5.4111%	400,000,000	21,644,342	6,567,362	98.358160%
2017 Sr. Notes 4.20% Due 2047	06/15/17	06/15/47	4.2000%	300,000,000	296,153,141	4.2763%	300,000,000	12,828,796	3,846,859	98.717714%
2018 Sr. Notes 4.20% Due 2048	03/01/18	03/15/48	4.2000%	300,000,000	296,442,890	4.2703%	300,000,000	12,810,996	3,557,110	98.814297%
2019 GMB 4.125% Due 2049	03/27/19	04/01/49	4.1250%	400,000,000	393,655,190	4.2186%	400,000,000	16,874,558	6,344,810	98.413797%
2023 Bond 5.50% Due 2053	03/15/23	03/15/53	5.5000%	300,000,000	296,760,000	5.5745%	300,000,000	16,723,575	3,240,000	98.920000%
Miscellaneous loss on reacquired debt								522,667		
Put/call option settlement								(397,575)		
Tax-exempt Debt Repurchased							(71,940,000)	(3,465,465)		
Total				**2,941,840,000**	**2,901,784,192**		**2,869,900,000**	**125,465,699**	**40,055,808**	

Weighted Average Cost of Debt Capital: **4.372%**

Common Equity

	Last Actual Balance	Projected Earnings (Losses)	Projected Dividend Payments	Total
Balance 09/30/2022	3,217,316,130			3,217,316,130
Jan-23		-	-	-
Feb-23		-	-	-
Mar-23		-	-	-
Apr-23		-	-	-
May-23		-	-	-
Jun-23	(47,650,486.8)	-	-	(47,650,487)
Jul-23		-	-	-
Aug-23		-	-	-
Projected Balance	**3,169,665,643**	**-**	**-**	**3,169,665,643**

Projected Earnings (Losses)

	Date Outlook		Total
			-
Jan-23			-
Feb-23			-
Mar-23			-
Apr-23			-
May-23			-
Jun-23			-
Jul-23			-
Aug-23			-
Total	**-**	**-**	**-**

Long-Term Debt

	Last Actual Balance	L-T Debt Maturities	Projected L-T Debt Issuances	Total
Balance 09/30/2022	2,926,100,750	-	-	2,926,100,750
Jan-23		-	-	-
Feb-23		-	-	-
Mar-23		(300,000,000)	300,000,000	-
Apr-23		-	-	-
May-23		-	-	-
Jun-23	300,000	-	-	300,000
Jul-23		-	-	-
Aug-23		-	-	-
Projected Balance	2,926,400,750	(300,000,000)	300,000,000	2,926,400,750

Evergy Kansas Metro Electric Utility

Capital Structure and Rate of Return

Actual Sept 30, 2022

Summary

	Balance	Weight	Rate	Rate of Return
Long-term Debt*	2,626,100,750	44.94%	4.0962%	1.8409%
Common Equity	3,217,316,130	55.06%	**10.2500%**	5.6435%
Total Capitalization	**5,843,416,880**	**100.00%**		**7.4844%**

*Includes unamortized debt expenses and discounts. **Excludes** current maturities of long-term debt

Long-Term Debt

Description	Date of Settlement	Date of Maturity	Interest Rate	Principal Amount of Issue	Net Proceeds	Yield to Maturity	Outstanding Debt Capital	Cost of Debt	Net Premium, Discount & Expense	Net Proceeds Percent of Original Issue
1993A Burlington EIRR Bonds 2.950% Due 2023	12/07/93	12/01/23	2.9500%	40,000,000	39,042,690	3.0727%	40,000,000	1,229,083	957,310	97.606725%
1993B Burlington EIRR Bonds 2.950% Due 2023	12/07/93	12/01/23	2.9500%	39,480,000	38,536,579	3.0725%	39,480,000	1,213,030	943,421	97.610382%
2015 Sr. Notes 3.65% Due 2025	08/18/15	08/15/25	3.6500%	350,000,000	345,790,906	3.7957%	350,000,000	13,284,994	4,209,094	98.797402%
2020 GMB 2.25% Due 2030	05/26/20	06/01/30	2.2500%	400,000,000	396,180,825	2.3576%	400,000,000	9,430,220	3,819,175	99.045206%
2005 La Cygne EIRR Bonds 4.650% Due 2035	09/01/05	09/01/35	4.6500%	21,940,000	21,379,303	4.8118%	21,940,000	1,055,717	560,697	97.444407%
2005 Burlington EIRR Bonds 4.650% Due 2035	09/01/05	09/01/35	4.6500%	50,000,000	48,662,914	4.8195%	50,000,000	2,409,748	1,337,086	97.325828%
2007A Burlington EIRR Variable Due 2035	09/19/07	09/01/35	1.8590%	73,250,000	72,288,211	1.9199%	73,250,000	1,406,330	961,789	98.686977%
2007B Burlington EIRR Variable Due 2035	09/19/07	09/01/35	1.8590%	73,250,000	72,288,211	1.9199%	73,250,000	1,406,330	961,789	98.686977%
2005 Sr. Notes Series B 6.05% Due 2035	11/17/05	11/15/35	6.0500%	250,000,000	246,235,946	6.1607%	250,000,000	15,401,637	3,764,054	98.494378%
2008 Missouri EIRR 3.50% Due 2038	05/22/08	05/01/38	3.5000%	23,400,000	22,514,017	3.7104%	23,400,000	868,235	885,983	96.213746%
2011 Sr. Notes 5.30% Due 2041	09/20/11	10/01/41	5.3000%	400,000,000	393,432,638	5.4111%	400,000,000	21,644,342	6,567,362	98.358160%
2017 Sr. Notes 4.20% Due 2047	06/15/17	06/15/47	4.2000%	300,000,000	296,153,141	4.2763%	300,000,000	12,828,796	3,846,859	98.717714%
2018 Sr. Notes 4.20% Due 2048	03/01/18	03/15/48	4.2000%	300,000,000	296,442,890	4.2703%	300,000,000	12,810,996	3,557,110	98.814297%
2019 GMB 4.125% Due 2049	03/27/19	04/01/49	4.1250%	400,000,000	393,655,190	4.2186%	400,000,000	16,874,558	6,344,810	98.413797%
Miscellaneous loss on reacquired debt								522,667		
Put/call option settlement								(397,575)		
Tax-exempt Debt Repurchased							(71,940,000)	(3,465,465)		
Total				**2,721,320,000**	**2,682,603,461**		**2,649,380,000**	**108,523,644**	**38,716,539**	

Weighted Average Cost of Debt Capital: **4.096%**

KS Metro Consolidated	
Unamort Debt Exp	17,444,965.00
Unamort Disc	(5,834,285.00)
	(23,279,250.00)

Evergy Central Electric Utility

Capital Structure and Rate of Return

Projected June 30, 2023

Long-Term Debt

	Balance	Weight	Rate	Rate of Return
Long-term Debt*	4,285,963,478	47.96%	4.3472%	2.0850%
Common Equity	4,650,135,150	52.04%	**10.2500%**	5.3339%
Total Capitalization	**8,936,098,628**	**100.00%**		**7.4189%**

*Includes unamortized debt expenses and discounts. There are no current maturities of long-term debt

Long-Term Debt

Description	Date of Settlement	Date of Maturity	Interest Rate	Principal Amount of Issue	Net Proceeds	Yield to Maturity	Outstanding Debt Capital	Cost of Debt	Net Premium, Discount & Expense	Net Proceeds Percent of Original Issue
WR 2015 FMB 3.25% Due 2025	11/13/15	12/01/25	3.2500%	250,000,000	247,949,597	3.3466%	250,000,000	8,366,599	2,050,403	99.179839%
WR 2016 FMB 2.55% Due 2026	06/20/16	07/01/26	2.5500%	350,000,000	345,238,685	2.7057%	350,000,000	9,470,010	4,761,315	98.639624%
KGE 1994 La Cygne PCB Variable Due 2027	04/28/94	04/15/27	3.5400%	21,940,000	20,763,492	3.8276%	21,940,000	839,782	1,176,508	94.637613%
WR 2017 FMB 3.10% Due 2027	03/06/17	04/01/27	3.1000%	300,000,000	296,205,083	3.2481%	300,000,000	9,744,272	3,794,917	98.735028%
KGE 2016 PCB 2.50% Due 2031	06/01/16	06/01/31	2.5000%	50,000,000	48,015,631	2.8265%	50,000,000	1,413,230	1,984,369	96.031261%
WR 1994 St. Marys PCB Variable Due 2032	04/28/94	04/15/32	3.5400%	45,000,000	43,694,021	3.6825%	45,000,000	1,657,121	1,305,979	97.097824%
WR 1994 Wamego PCB Variable Due 2032	04/28/94	04/15/32	3.5400%	30,500,000	29,576,046	3.6889%	30,500,000	1,125,107	923,954	96.970643%
KGE 1994 St. Marys PCB Variable Due 2032	04/28/94	04/15/32	3.6600%	14,500,000	14,015,257	3.8277%	14,500,000	555,011	484,743	96.656946%
KGE 1994 Wamego PCB Variable Due 2032	04/28/94	04/15/32	3.6600%	10,000,000	9,647,351	3.8371%	10,000,000	383,711	352,649	96.473508%
KGE 2007 FMB 6.53% Due 2037	10/15/07	12/15/37	6.5300%	175,000,000	173,937,727	6.5756%	175,000,000	11,507,337	1,062,273	99.392987%
KGE 2008 FMB 6.64% Due 2038	05/15/08	05/15/38	6.6400%	100,000,000	100,175,656	6.6264%	100,000,000	6,626,442	(175,656)	100.175656%
WR 2012 FMB 4.125% Due 2042	03/01/12	03/01/42	4.1250%	550,000,000	511,982,336	4.5496%	550,000,000	25,022,808	38,017,664	93.087697%
WR 2013 FMB 4.10% Due 2043	03/28/13	04/01/43	4.1000%	430,000,000	417,173,662	4.2774%	430,000,000	18,392,704	12,826,338	97.017131%
WR 2013 FMB 4.625% Due 2043	08/19/13	09/01/43	4.6250%	250,000,000	246,658,133	4.7085%	250,000,000	11,771,226	3,341,867	98.663253%
KGE 2014 FMB 4.30% Due 2044	07/02/14	07/15/44	4.3000%	250,000,000	246,453,918	4.3853%	250,000,000	10,963,295	3,546,082	98.581567%
WR 2015 FMB 4.25% Due 2045	11/13/15	12/01/45	4.2500%	300,000,000	233,257,431	5.8269%	300,000,000	17,480,643	66,742,569	77.752477%
WR 2019 FMB 3.25% Due 2049	08/19/19	09/01/49	3.2500%	300,000,000	294,168,487	3.3531%	300,000,000	10,059,417	5,831,513	98.056162%
WR 2020 FMB 3.45% Due 2050	04/09/20	04/15/50	3.4500%	500,000,000	477,284,920	3.7019%	500,000,000	18,509,687	22,715,080	95.456984%
WR 2022 FMB 5.50% Due 2053	03/15/23	03/15/53	5.5000%	400,000,000	395,680,000	5.5745%	400,000,000	22,298,100	4,320,000	98.920000%
Miscellaneous loss on reacquired debt								1,914,023		
Total				**4,326,940,000**	**4,151,877,433**		**4,326,940,000**	**188,100,525**	**175,062,567**	

Weighted Average Cost of Debt Capital: **4.347%**

Common Equity

	Last Actual Balance	Projected Earnings (Losses)	Projected Dividend Payments	Total
Balance 09/30/2022	4,531,735,150			4,531,735,150
Jan-23		-	-	-
Feb-23		-	-	-
Mar-23		-	-	-
Apr-23		-	-	-
May-23		-	-	-
Jun-23		118,400,000	-	118,400,000
Jul-23		-	-	-
Aug-23		-	-	-
Projected Balance	**4,531,735,150**	**118,400,000**	**-**	**4,650,135,150**

Projected Earnings (Losses)

		Date Outlook	Total
Jan-23			-
Feb-23			-
Mar-23			-
Apr-23			-
May-23			-
Jun-23			-
Jul-23			-
Aug-23			-
Total	-	-	-

Long-Term Debt

	Last Actual Balance	L-T Debt Maturities	Projected L-T Debt Issuances	Total
Balance 09/30/2022	3,936,263,478	-	-	3,936,263,478
Jan-23		-	-	-
Feb-23		-	-	-
Mar-23		-	400,000,000	400,000,000
Apr-23		-	-	-
May-23		(50,000,000)	-	(50,000,000)
Jun-23	(300,000)	-	-	(300,000)
Jul-23		-	-	-
Aug-23		-	-	-
Projected Balance	3,935,963,478	(50,000,000)	400,000,000	4,285,963,478

Evergy Kansas Central Electric Utility

Capital Structure and Rate of Return

Actual Sept 30, 2022

Summary

	Balance	Weight	Rate	Rate of Return
Long-term Debt*	3,886,263,478	46.17%	4.1707%	1.9254%
Common Equity	4,531,735,150	53.83%	10.2500%	5.5180%
Total Capitalization	8,417,998,628	100.00%		7.4434%

*Includes unamortized debt expenses and discounts. **Excludes** current maturities of long-term debt, but there are none at this point.

Long-Term Debt

Description	Date of Settlement	Date of Maturity	Interest Rate	Principal Amount of Issue	Net Proceeds	Yield to Maturity	Outstanding Debt Capital	Cost of Debt	Net Premium, Discount & Expense	Net Proceeds Percent of Original Issue
WR 2015 FMB 3.25% Due 2025	11/13/15	12/01/25	3.2500%	250,000,000	247,949,597	3.3466%	250,000,000	8,366,599	2,050,403	99.179839%
WR 2016 FMB 2.55% Due 2026	06/20/16	07/01/26	2.5500%	350,000,000	345,238,685	2.7057%	350,000,000	9,470,010	4,761,315	98.639624%
KGE 1994 La Cygne PCB Variable Due 2027	04/28/94	04/15/27	1.9440%	21,940,000	20,763,492	2.1727%	21,940,000	476,679	1,176,508	94.637613%
WR 2017 FMB 3.10% Due 2027	03/06/17	04/01/27	3.1000%	300,000,000	296,205,083	3.2481%	300,000,000	9,744,272	3,794,917	98.735028%
KGE 2016 PCB 2.50% Due 2031	06/01/16	06/01/31	2.5000%	50,000,000	48,015,631	2.8265%	50,000,000	1,413,230	1,984,369	96.031261%
WR 1994 St. Marys PCB Variable Due 2032	04/28/94	04/15/32	1.9440%	45,000,000	43,694,021	2.0545%	45,000,000	924,504	1,305,979	97.097824%
WR 1994 Wamego PCB Variable Due 2032	04/28/94	04/15/32	1.9440%	30,500,000	29,576,046	2.0594%	30,500,000	628,114	923,954	96.970643%
KGE 1994 St. Marys PCB Variable Due 2032	04/28/94	04/15/32	1.9440%	14,500,000	14,015,257	2.0716%	14,500,000	300,382	484,743	96.656946%
KGE 1994 Wamego PCB Variable Due 2032	04/28/94	04/15/32	1.9440%	10,000,000	9,647,351	2.0788%	10,000,000	207,876	352,649	96.473508%
KGE 2007 FMB 6.53% Due 2037	10/15/07	12/15/37	6.5300%	175,000,000	173,937,727	6.5756%	175,000,000	11,507,337	1,062,273	99.392987%
KGE 2008 FMB 6.64% Due 2038	05/15/08	05/15/38	6.6400%	100,000,000	100,175,656	6.6264%	100,000,000	6,626,442	(175,656)	100.175656%
WR 2012 FMB 4.125% Due 2042	03/01/12	03/01/42	4.1250%	550,000,000	511,982,336	4.5496%	550,000,000	25,022,808	38,017,664	93.087697%
WR 2013 FMB 4.10% Due 2043	03/28/13	04/01/43	4.1000%	430,000,000	417,173,662	4.2774%	430,000,000	18,392,704	12,826,338	97.017131%
WR 2013 FMB 4.625% Due 2043	08/19/13	09/01/43	4.6250%	250,000,000	246,658,133	4.7085%	250,000,000	11,771,226	3,341,867	98.663253%
KGE 2014 FMB 4.30% Due 2044	07/02/14	07/15/44	4.3000%	250,000,000	246,453,918	4.3853%	250,000,000	10,963,295	3,546,082	98.581567%
WR 2015 FMB 4.25% Due 2045	11/13/15	12/01/45	4.2500%	300,000,000	233,257,431	5.8269%	300,000,000	17,480,643	66,742,569	77.752477%
WR 2019 FMB 3.25% Due 2049	08/19/19	09/01/49	3.2500%	300,000,000	294,168,487	3.3531%	300,000,000	10,059,417	5,831,513	98.056162%
WR 2020 FMB 3.45% Due 2050	04/09/20	04/15/50	3.4500%	500,000,000	477,284,920	3.7019%	500,000,000	18,509,687	22,715,080	95.456984%
Miscellaneous loss on reacquired debt								1,914,023		
Total				**3,926,940,000**	**3,756,197,433**		**3,926,940,000**	**163,779,247**	**170,742,567**	
Weighted Average Cost of Debt Capital:								**4.171%**		

KS Central Consolidated

Unamort Debt Exp	28,217,817.00
Unamort Disc	(12,458,705.00)
	(40,676,522.00)

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

VERIFICATION

Kirk Andrews, being duly sworn upon his oath deposes and states that he is the Executive Vice President Chief Financial Officer, for Evergy, Inc., that he 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 his knowledge, information and belief.

Kirk Andrews

Subscribed and sworn to before me this 24 day of April, 2023.

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