

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

In the Matter of the Petition of)
Evergy Kansas Central, Inc.,)
Evergy Kansas South, Inc.,)
and Evergy Metro, Inc., for)
Determination of the Ratemaking)
Principles and Treatment that)
Will Apply to the Recovery in)
Rates of the Cost to be Incurred)
for Certain Electric Generation)
Facilities Under K.S.A. 66-1239.)

Docket No. 25-EKCE-207-PRE

TESTIMONY OF KATHY RICHARDSON

IN BEHALF OF

INTERVENOR CITY OF LAWRENCE, KANSAS

March 13, 2025

DOCKET NO. 25-EKCE-207-PRE
DIRECT TESTIMONY OF KATHY RICHARDSON

1 Q. Please state for the record your name and business
2 address.

3 A. My name is Kathy Richardson. My business address is City
4 of Lawrence, Kansas, City Hall, 6 East 6th Street,
5 P.O. Box 708, Lawrence, Kansas 66044.

6 Q. By whom are you employed and in what position.

7 A. I am employed by the City of Lawrence, Kansas, as
8 Director of the Department of Sustainability. I have
9 served the City in that capacity for 3 years. Prior to
10 that, I served the City as Solid Waste Division Manager
11 for 9 years. As Director of Sustainability, it is my job
12 to ensure that the City continues to be a sustainable
13 community, enjoying a vibrant economy, a healthy
14 environment, and a livable society.

15 Q. In whose behalf are you testifying in this proceeding.

16 A. I am testifying in behalf of Intervenor City of Lawrence,
17 Kansas.

18 Q. Have you previously filed testimony in other proceedings
19 before the Commission.

20 A. No.

21 Q. Are you sponsoring any exhibits.

22 A. No.

23 Q. What is the purpose of your testimony.

24 A. Evergy Kansas Central, Inc., Evergy Kansas South, Inc.,
25 and Evergy Metro, Inc., (collectively "Evergy") have
26 filed a Petition for Determination of Ratemaking

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1 Principles and Treatment under K.S.A. 66-1239(d)(2),
2 seeking to finalize ratemaking principles for natural gas
3 plants proposed to be constructed and acquired in Reno
4 County and Sumner County and a solar generation facility
5 to be located in Douglas County. The City of Lawrence has
6 intervened to ensure that its community interests are
7 represented and that the interests of ratepayers that
8 live within the Lawrence community are balanced with
9 those of utility investors.

10 **Q. What is the position of the City of Lawrence?**

11 A. The City of Lawrence does not oppose Evergy's proposed
12 construction and acquisition of natural gas plants in
13 Reno County and in Sumner County or in the proposed solar
14 generation facility to be located in Douglas County, as
15 that is consistent with Evergy's preferred Integrated
16 Resource Plan. However, in light of certain assurances
17 made by Evergy, the City seeks certain commitments from
18 Evergy to ensure that Evergy's investments in those
19 facilities align with the City's priorities -- which in
20 part have been driven by those assurances by Evergy --
21 for economic growth, energy reliability, and
22 sustainability.

23 **Q. What commitments does the City of Lawrence seek from**
24 **Evergy through its intervention.**

25 A. Specifically, the City of Lawrence seeks four commitments
26 from Evergy:

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1 First, the City of Lawrence would ask Evergy to repurpose
2 the Lawrence Energy Center's currently unused space and
3 any future decommissioned areas of the same as a battery
4 storage site.

5 Second, the City would ask Evergy to develop a 24-hours-
6 a-day, seven-days-a-week, carbon-free electricity tariff
7 that would permit customers to match usage with carbon-
8 free electricity, in part to attract new economic
9 development customers.

10 Third, the City would ask Evergy to invest in Distributed
11 Resources. This request would take on three forms:

12 (a) Evergy's investment in community-based solar and
13 storage systems for commercial and residential customers;
14 (b) Evergy's sponsorship of energy efficiency assessments
15 and upgrades for municipal, county, and school district
16 buildings; and (c) Evergy's investment in energy
17 efficiency measures for new construction and existing
18 residential structures (including congregate living and
19 apartments).

20 Fourth, the City would ask Evergy to invest in Local
21 Emissions Reduction. This would include: (a) to the
22 extent permitted by law, Evergy's sponsorship of the
23 installation of EV fast-charging stations at municipal
24 and private locations selected by the City; (b) to the
25 extent permitted by law, Evergy's investment in
26 residential electrical upgrades required for the

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1 installation of personal EV fast-charging systems within
2 the City; and (c) Evergy's sponsorship of municipal
3 bicycle and pedestrian infrastructure upgrades within the
4 City to reduce energy consumption, to improve air
5 quality, and to ameliorate certain negative impacts of
6 carbon-based electricity generation.

7 **Q. Do you have anything else to add.**

8 A. No. But, I would reiterate that the City of Lawrence does
9 not oppose Evergy's proposed construction and acquisition
10 of natural gas plants in Reno County and Sumner County or
11 in the solar generation facility to be located in Douglas
12 County, but that it would request from Evergy those four
13 ~~specific commitments that I testified about earlier in~~
14 order that Evergy's investments align -- for the benefit
15 of ratepayers within the Lawrence community -- with the
16 City's priorities for economic growth, reliability, and
17 sustainability.

18 **Q. Does that conclude your testimony.**

19 A. Yes.

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the above and foregoing "Testimony of Kathy Richardson in Behalf of Intervenor City of Lawrence, Kansas" was served upon the following:

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via electronic mail, at the above-stated e-mail addresses, on this
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