

**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) Docket No. 25-EKCE-207-PRE
Apply to the Recovery in Rates of the Cost to be)
Incurred for Certain Electric Generation Facilities)
under K.S.A. 66-1239.)

MOTION TO FILE AS AN EXHIBIT IN THIS DOCKET,
THE ANNUAL UPDATE TO THE INTEGRATED RESOURCE PLAN
OF EVERGY KANSAS CENTRAL

COMES NOW the Kansas Industrial Consumers Group, Inc. (“KIC”) and respectfully requests that the State Corporation Commission of the State of Kansas (“Commission” or “KCC”) permit KIC to file as an Exhibit in this Docket, the “2025 Annual Update Integrated Resource Plan” filed on May 1, 2025, in KCC Docket No. 19-KCPE-096-CPL.

KIC Exhibit 15 would be the “Public” version of the 2025 Annual Update Integrated Resource Plan, and KIC Exhibit No. 16 would be the “Confidential” version of the 2025 Annual Update Integrated Resource Plan.

In support of its Motion, KIC states as follows:

1. On November 6, 2024, Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (together “Evergy Kansas Central” or “EKC”) and Evergy Kansas Metro (“EKM”) filed a Petition in this KCC Docket:

“... requesting a determination of the ratemaking principles and treatment that will apply to the recovery in rates of the costs to be incurred in

constructing and acquiring a stake in two new combined cycle gas-fired generating facilities and one solar facility.”¹

2. The Petition states as follows:

Petitioners’ most recent preferred plan is included in their May 17, 2024, triennial IRP filing. The preferred plan advances Evergy’s long-term strategy for responsibly transitioning its generation fleet away from coal over time while maintaining a diverse fuel mix and sufficient flexibility to make appropriate planning adjustments. The flexibility of the plan allows Evergy to focus on reliability and affordability while adapting to environmental, technological, and market opportunities and challenges. As reflected in the 2024 IRP filing, Evergy’s transition strategy includes the measured retirement of coal plants over time and replacement of that generation capacity and energy with a mix of highly efficient dispatchable thermal resources, renewable resources, and demand-side management programs.²

3. K.S.A. 66-1239, provides in relevant part:

(c) (2) Any utility seeking a determination of rate-making principles and treatment under subsection (c)(1) shall as a part of its filing describe how the public utility's stake in the generating facility is consistent with *the public utility's most recent preferred plan and resource acquisition strategy submitted to the commission*.³

4. On May 1, 2025, Evergy Kansas Central filed its “Evergy Kansas Central 2025 Annual Update Integrated Resource Plan” filing in KCC Docket No. 24-EKCE-387-CPL (“2025 IRP Update”).⁴

5. The described EKC filing of May 1, 2025, is EKC’s “most recent preferred plan and resource acquisition strategy submitted to the commission.”⁵

¹ Petition of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Determination of Ratemaking Principles and Treatment, p.1, KCC Docket No. 25-EKCE-207-PRE (Nov. 6, 2024).

² *Id.* at ¶ 42. See also Evergy Kansas Central and Evergy Metro, Preferred Portfolio Selection and Resource Acquisition Strategy, Vol. 6, Integrated Resource Plan (May 2024), Docket No. 24-EKCE-387-CPL.

³ K.S.A. 1239(c)(2), as amended (emphasis added).

⁴ See generally Evergy Kansas Central 2025 Annual Update Integrated Resource Plan, KCC Docket No. 24-EKCE-387-CPL (May 1, 2025) <https://estar.kcc.ks.gov/estar/ViewFile.aspx/S202505011626148669.pdf?Id=1bcb290e-e6b0-4e5e-a318-869abd000ac5>.

⁵ See K.S.A. 1239(c)(2), as amended (emphasis added).

6. The “most recent preferred plan and resource acquisition strategy submitted to the commission” is a statutory requirement to the K.S.A. 66-1239 Predetermination Statute. Therefore, the 2025 IRP Update is relevant to this Docket and to the Commission’s analysis for Predetermination under Kansas law.

WHEREFORE, KIC respectfully requests that the Commission grant KIC’s Motion to add as an Exhibit in this Docket, both the Confidential and Public versions of the Evergy Kansas Central 2025 Annual Update – Integrated Resource Plan, dated May 1, 2025, and filed at the Commission on May 1, 2025, in KCC Docket No. 24-EKCE-387-CPL.⁶

Respectfully submitted,

/s/ James P. Zakoura

James P. Zakoura, KS 07644
Lee M. Smithyman, KS 09391
Daniel J. Buller, KS 25002
Sarah C. Otto, KS 27954
Molly E. Morgan, KS 29683
FOULSTON SIEFKIN LLP
7500 College Boulevard, Suite 1400
Overland Park, KS 66210-4041
Telephone: 913-253-2142
Email: jzakoura@foulston.com
lsmithyman@foulston.com
dbuller@foulston.com
sotto@foulston.com
mmorgan@foulston.com

Attorneys for Intervenor

⁶ See generally Evergy Kansas Central 2025 Annual Update Integrated Resource Plan, KCC Docket No. 24-EKCE-387-CPL (May 1, 2025) <https://estar.kcc.ks.gov/estar/ViewFile.aspx/S202505011626148669.pdf?Id=1bcb290e-e6b0-4e5e-a318-869abd000ac5>.

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of May 2025, the above and foregoing was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to all parties on the service list as follows:

JOSEPH R. ASTRAB, ATTORNEY
CITIZENS' UTILITY RATEPAYER
BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
joseph.astrab@ks.gov

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
todd.love@ks.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER
BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
della.smith@ks.gov

SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
shonda.rabb@ks.gov

JUSTIN GRADY, CHIEF OF REVENUE
REQUIREMENTS, COST OF SERVICE
& FINANCE
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
justin.grady@ks.gov

CATHRYN J. DINGES, SR. DIRECTOR &
REGULATORY AFFAIRS COUNSEL
EVERGY KANSAS CENTRAL, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
cathy.dinges@evergy.com

BRIAN G. FEDOTIN, GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
brian.fedotin@ks.gov

GLENDA CAFER, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY
800 SW JACKSON, STE 1310
TOPEKA, KS 66612
gcafer@morrislaing.com

J.T. KLAUS, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
jtklaus@twgfirm.com

KACEY S MAYES, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
ksmayes@twgfirm.com

TREVOR WOHLFORD, ATTORNEY
MORRIS LAING EVANS BROCK &
KENNEDY
800 SW JACKSON, SUITE 1310
TOPEKA, KS 66612-1216
twohlford@morrislaing.com

WILL B. WOHLFORD, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY,
CHTD
300 N MEAD, STE 200
WICHITA, KS 67202-2745
wwohlford@morrislaing.com

CARLY MASENTHIN, LITIGATION
COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
carly.masenthin@ks.gov

PATRICK HURLEY, CHIEF LITIGATION
COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
patrick.hurley@ks.gov

VALERIE SMITH, ADMINISTRATIVE
ASSISTANT
MORRIS LAING EVANS BROCK &
KENNEDY
800 SW JACKSON
SUITE 1310
TOPEKA, KS 66612-1216
vsmith@morrislaing.com

RITA LOWE, PARALEGAL
MORRIS LAING EVANS BROCK & KENNEDY
CHTD
300 N MEAD STE 200
WICHITA, KS 67202-2745
rlowe@morrislaing.com

DANIEL J BULLER, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
dbuller@foulston.com

SARAH C OTTO
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
sotto@foulston.com

LEE M SMITHYMAN, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
lsmithyman@foulston.com

JAMES P ZAKOURA, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
jzakoura@foulston.com

MOLLY E. MORGAN
FOULSTON SIEFKIN LLP
1551 N. WATERFRONT PARKWAY, SUITE
100
WICHITA, KS 67206
mmorgan@foulston.com

JAMES GING, DIRECTOR ENGINEERING
SERVICES
KANSAS POWER POOL
100 N BROADWAY STE L110
WICHITA, KS 67202
jging@kpp.agency

COLIN HANSEN, CEO/GENERAL
MANAGER
KANSAS POWER POOL
100 N BROADWAY STE L110
WICHITA, KS 67202
chansen@kpp.agency

JOHN J. McNUTT, General Attorney
U.S. ARMY LEGAL SERVICES AGENCY
REGULATORY LAW OFFICE
9275 GUNSTON RD., STE. 1300
FORT BELVOIR, VA 22060-5546
john.j.mcnutt.civ@army.mil

TIMOTHY E. McKEE, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
temckee@twgfirm.com

PATRICK PARKE, CEO
MIDWEST ENERGY, INC.
1330 CANTERBURY RD
PO BOX 898
HAYS, KS 67601-0898
patparke@mwenergy.com

ANNE E. CALLENBACH, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
acallenbach@polsinelli.com

JARED R. JEVONS, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
jjevons@polsinelli.com

LARRY HOLLOWAY, ASST GEN MGR
OPERATIONS
KANSAS POWER POOL
100 N BROADWAY STE L110
WICHITA, KS 67202
lholloway@kpp.agency

KEVIN K. LACHANCE, CONTRACT LAW
ATTORNEY
UNITED STATES DEPARTMENT OF DEFENSE
ADMIN & CIVIL LAW DIVISION
OFFICE OF STAFF JUDGE ADVOCATE
FORT RILEY, KS 66442
kevin.k.lachance.civ@army.mil

DAN LAWRENCE, GENERAL COUNSEL
UNIFIED SCHOOL DISTRICT 259
903 S EDGEMOOR RM 113
WICHITA, KS 67218
dlawrence@usd259.net

AARON ROME, VP OF ENERGY SUPPLY
MIDWEST ENERGY, INC.
1330 CANTERBURY DRIVE
PO BOX 898
HAYS, KS 67601-0898
arome@mwenergy.com

FRANK A. CARO, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
fcaro@polsinelli.com

PEGGY A. TRENT, CHIEF COUNTY
COUNSELOR
THE BOARD OF COUNTY COMMISSIONERS
OF JOHNSON COUNTY
111 S. CHERRY STE 3200
OLATHE, KS 66061
peg.trent@jocogov.org

JAMES G. FLAHERTY
ANDERSON & BYRD, LLP
216 S. HICKORY, P.O. BOX 17
OTTAWA, KS 66067
jflaherty@andersonbyrd.com

ROBERT R. TITUS
TITUS LAW FIRM, LLC
7304 W 130TH ST., SUITE 190
OVERLAND PARK, KS 66213
rob@tituslawkc.com

CONSTANCE CHAN, SENIOR CATEGORY
MANAGER - ELECTRICITY & BUSINESS
TRAVEL
HF SINCLAIR EL DORADO REFINING
LLC
2323 VICTORY AVE. STE 1400
DALLAS, TX 75219
constance.chan@hfsinclair.com

GREG WRIGHT
PRIORITY POWER MGT.
12512 AUGUSTA DR
KANSAS CITY, KS 66109
gwright@prioritypower.com

RANDALL F. LARKIN, ATTORNEY
CITY OF LAWRENCE
PO BOX 708
LAWRENCE, KS 66044
rlarkin@lawrenceks.org

KATHY RICHARDSON, SUSTAINABILITY
DIRECTOR
CITY OF LAWRENCE
PO BOX 708
LAWRENCE, KS 66044
krichardson@lawrenceks.org

SHELLY M. BASS, ASSOCIATE GENERAL
COUNSEL
ATMOS ENERGY CORPORATION
5430 LBJ FREEWAY, 1800 THREE LINCOLN
CENTRE
DALLAS, TX 75240
shelly.bass@atmosenergy.com

KATHLEEN R. OCANAS, DIVISION VP OF
RATES & REGULATORY AFFAIRS
ATMOS ENERGY CORPORATION
25090 W. 110TH TER
OLATHE, KS 66061
kathleen.ocanas@atmosenergy.com

JON LINDSEY, CORPORATE COUNSEL
HF SINCLAIR EL DORADO REFINING LLC
550 E. SOUTH TEMPLE
SALT LAKE CITY, UT 84102
jon.lindsey@hfsinclair.com

JAMES OWEN, COUNSEL
RENEW MISSOURI ADVOCATES
915 E ASH STREET
COLUMBIA, MO 65201
james@renewmo.org

BRANDON McGUIRE, ASST. CITY MANAGER
CITY OF LAWRENCE
PO BOX 708
LAWRENCE, KS 66044
bmcmguire@lawrenceks.org

TONI WHEELER, DIRECTOR, LEGAL
SERVICES DEPT.
CITY OF LAWRENCE
CITY HALL
6 EAST SIXTH ST
LAWRENCE, KS 66044
twheeler@lawrenceks.org

DOROTHY BARNETT
CLIMATE & ENERGY PROJECT
PO BOX 1858
HUTCHINSON, KS 67504-1858
barnett@climateandenergy.org

C. EDWARD WATSON, ATTORNEY
FOULSTON SIEFKIN LLP
1551 N WATERFRONT PKWY STE 100
WICHITA, KS 67206-4466
cewatson@foulston.com

NICOLE MERS, ATTORNEY
RENEW MISSOURI ADVOCATES
501 FAY STREET
COLUMBIA, MO 65201
nicole@renewmo.org

ROBERT E. VINCENT, MANAGING
ATTORNEY
KANSAS GAS SERVICE, A DIVISION OF
ONE GAS, INC.
7421 W. 129TH STREET
OVERLAND PARK, KS 66213
robert.vincent@onegas.com

TERRI J PEMBERTON, GENERAL
COUNSEL
KANSAS MUNICIPAL ENERGY AGENCY
6300 W 95TH ST
OVERLAND PARK, KS 66212-1431
pemberton@kmea.com

ALISSA GREENWALD, ATTORNEY
KEYES & FOX LLP
1580 LINCOLN STREET STE 1105
DENVER, CO 80203
agreenwald@keyesfox.com

LESLIE WINES, SR. EXEC. ADMIN. ASST.
EVERGY KANSAS CENTRAL, INC
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
leslie.wines@evergy.com

KEVIN M FOWLER, COUNSEL
FRIEDEN & FORBES, LLP
1414 SW ASHWORTH PLACE STE 201
TOPEKA, KS 66604
kfowler@fflawllp.com

LORNA EATON, MANAGER OF RATES AND
REGULATORY AFFAIRS
KANSAS GAS SERVICE, A DIVISION OF ONE
GAS, INC.
7421 W 129TH STREET
OVERLAND PARK, KS 66213
lorna.eaton@onegas.com
invoices@onegas.com

PAUL MAHLBERG, GENERAL MANAGER
KANSAS MUNICIPAL ENERGY AGENCY
6300 W 95TH ST
OVERLAND PARK, KS 66212-1431
mahlberg@kmea.com

DARREN PRINCE, MANAGER, REGULATORY
& RATES
KANSAS MUNICIPAL ENERGY AGENCY
6300 W 95TH ST
OVERLAND PARK, KS 66212-1431
prince@kmea.com

JASON KEYES, PARTNER
KEYES & FOX LLP
580 CALIFORNIA ST 12TH FLOOR
SAN FRANCISCO, CA 94104
jkeyes@keyesfox.com

DAN BRUER, EXECUTIVE DIRECTOR
NEW ENERGY ECONOMICS
1390 YELLOW PINE AVE
BOULDER, CO 80305
dan.bruer@newenergyeconomics.org

TIMOTHY J LAUGHLIN, ATTORNEY
SCHOONOVER & MORIARTY, LLC
130 N. CHERRY STREET, STE 300
OLATHE, KS 66061
tlaughlin@schoonoverlawfirm.com

TIM OPITZ
OPITZ LAW FIRM, LLC
308 E. HIGH STREET
SUITE B101
JEFFERSON CITY, MO 65101
tim.opitz@opitzlawfirm.com

ASHOK GUPTA, EXPERT
NATIONAL RESOURCES DEFENSE COUNCIL
20 N WACKER DRIVE SUITE 1600
CHICAGO, IL 60606
agupta@nrdc.org

James P. Zakoura

James P. Zakoura, KS 07644
FOULSTON SIEFKIN LLP

Attorneys for Intervenors