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State Corporation Commission
of Kansas

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

REBUTTAL TESTIMONY OF

LESLEY ELWELL

ON BEHALF OF EKC KANSAS CENTRAL, INC. AND EKC KANSAS SOUTH, INC.

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

Docket No. 25-EKCE-294-RTS

JULY 3, 2025

I. INTRODUCTION AND PURPOSE

Q: Please state your name and business address.

A: My name is Lesley Elwell. 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. and serve as Senior Vice President – Chief People Officer for Evergy Metro, Inc. d/b/a Evergy Kansas Metro, Evergy Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central, Evergy Metro, Inc. d/b/a as Evergy Missouri Metro, Evergy Missouri West, Inc. d/b/a Evergy Missouri West, the operating utilities of Evergy, Inc

Q: On whose behalf are you testifying?

A: I am testifying on behalf of Evergy Kansas Central ("EKC" or "Company").

Q: Have you provided testimony before the Commission in any previous dockets?

A: No.

Q: What is the purpose of your rebuttal testimony?

A: The purpose of my rebuttal testimony is to discuss various compensation programs offered by EKC to employees, executives and directors during the relevant time frame of 2022 through 2025, including the Annual Incentive Plan ("AIP") offered to executives of the company, Variable Compensation Plan ("VCP") offered to non-union employees, the Wolf Creek Performance Achievement Reward ("PAR") offered to Wolf Creek union employees, as well as EKC's long-term incentive compensation program. I will discuss the metrics, targets, components and purposes of these compensation plans, and I will discuss how each provides substantial benefits to EKC's customers. Lastly, I will briefly respond to positions of certain parties to this proceeding who advocate that all or part of the compensation paid under these plans should be removed from cost of service and disallowed for rate recovery.

II. EKC'S OVERALL APPROACH TO COMPENSATION

Q. What is EKC's overall strategy or approach regarding compensation?

A. EKC's focus and goal in creating its compensation structures is to attract and retain excellent employees, and to provide incentives to its employees to advance the Company's primary mission to provide affordable, reliable and sustainable service to its customers and communities. This entails not only providing compensation packages that are competitive in the marketplace and attractive to talented and motivated employees, but also that align compensation incentives with the goals and objectives of EKC's mission.

The primary objectives of EKC's compensation programs are to accomplish the following:

- Attract and retain highly qualified employees and leaders using competitive pay packages with target total compensation positioned around the market median and opportunities to earn higher levels of total compensation through performance-based incentives;
- Attach reasonable amounts of pay to performance, which includes providing sufficient upside potential for employees related to performance metrics, and placing certain levels of executive compensation at-risk and subject to performance-related incentive metrics;
- Rewarding long-term growth and sustained financial performance by aligning the economic interests of employees and officers with interest of customers and shareholders by, when appropriate, providing meaningful compensation levels in the form of equity-based compensation;
- Encouraging teamwork by rewarding specific teamwork and collaboration goals among employees and executives to improve outcomes and benefit customers and shareholders.

Q. Why is the right set of compensation plans important to achievement of EKC's mission?

A. EKC believes that it is only as strong as its employees, and that it must attract, retain and develop a strong, diverse team of people to create long-term shareholder and customer value. The Company's culture and its compensation and leadership development programs are fundamental to achieving this goal. In order to build a strong, positive culture, EKC believes it must create a talented and motivated workforce and must cultivate positive and enduring relationships with its employees that enable our workforce to carry out its company mission. Employees need to care about the Company's mission, vision and values and continuously strive to improve the Company and individual performance, which will drive benefits to both shareholders and, importantly, to customers as well. A key component of building a winning culture is linking the financial success of the Company to individual employee efforts through recognition and comprehensive and competitive compensation plans. EKC competes with other utilities and companies in our communities to attract and retain talented and experienced employees and leaders. It cannot execute its mission to provide safe, reliable and affordable service to its customers without excellent employees and leaders, and it cannot attract and retain excellent employees and leaders without competitive and attractive compensation packages.

Q. How does EKC ensure that its compensation packages are market-competitive?

A. EKC's Compensation and Leadership Development Committee regularly evaluates the Company's compensation program against peer companies and other relevant companies and industries to assure that EKC is offering market-competitive compensation. In order to obtain the additional benefit of an objective, data-driven analysis, the Committee generally also hires its own outside independent consultant to gather, summarize and interpret data regarding peer company compensation at various levels. EKC has also retained Willis Towers Watson, LLC as a consultant to provide data to support the objective benchmarks for market-competitive compensation levels. Willis Towers Watson provides this information from its extensive data base, which includes a broad utility industry view, and the compensation data is size-adjusted based on revenues to account for EKC's relative size. With assistance from Willis Towers Watson, the Committee is able to identify peer utilities, as well as companies from other industries, with similar size and business mix to draw fair comparisons in the marketplace.

Q. How do customers benefit from EKC's compensation plans?

A. As stated above, competitive and attractive compensation plans are necessary to attract and retain high-quality employees and leaders to the company. Quality employees and leaders directly benefit EKC's customers in numerous ways. A quality workforce and leadership group generally produce broad-based benefits by forming and executing company policy, direction and strategy that focuses on and enhances aspects of safety, reliability, and overall efficiency of customer service at reasonable and affordable costs to customers. Implementing compensation plans that incentivize operational efficiency, reliability and safety metrics, as well as cost-conscious behaviors, reinforces those directives throughout EKC's workforce, which enhances the likelihood of positive outcomes beneficial to customers in these areas. For example, competitive compensation plans can lead to quicker response times to outages, excellent customer service, operational efficiency to working efficiently and reducing operational costs, and foster innovation and improve the reliability of our services. In addition, high quality employees and leaders allow EKC to excel in many important measures, including safety, quality and efficiency of operations, quality of customer service, as well as financial performance. The Company's ability to excel in all of these categories produces direct benefits to customers in the form of safe, reliable and affordable service.

Q. How does financial performance of the Company help provide benefits to customers?

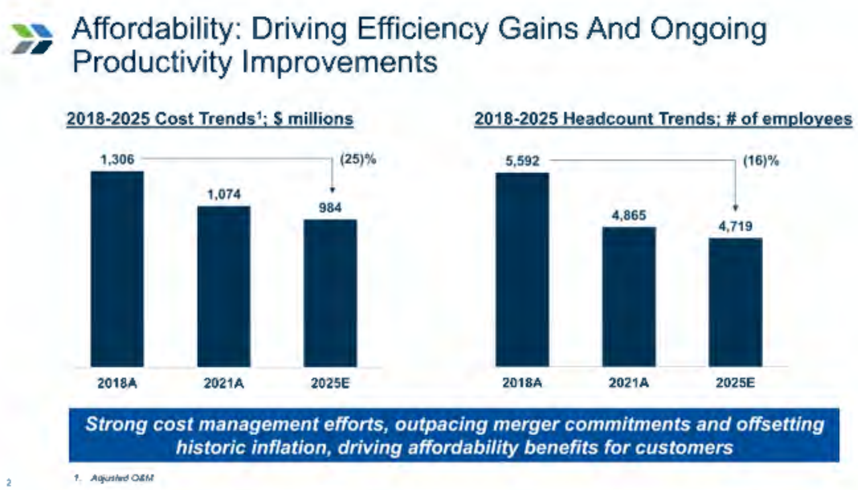
A. Contrary to positions asserted by certain intervenors in this case, financial performance of the Company does not provide benefits to only our shareholders. Financial performance of the Company also provides clear benefits to customers. It is fallacy to presume that because performance in a particular metric benefits shareholders, it automatically does not provide benefits to customers. Indeed, both customers and shareholders have an interest in and derive important direct benefits from enhancements to reliability of service. The same is true with respect to Company financial performance. For example,

- Efficient operations and cost savings help reduce rate increases;
- Healthy financial performance allows for investments in upgrading and maintaining infrastructure leading to fewer outages, better service reliability, and the ability to adopt new technologies that enhance service quality
- Financial stability allows us to train and retain our skilled employees leading to better customer service

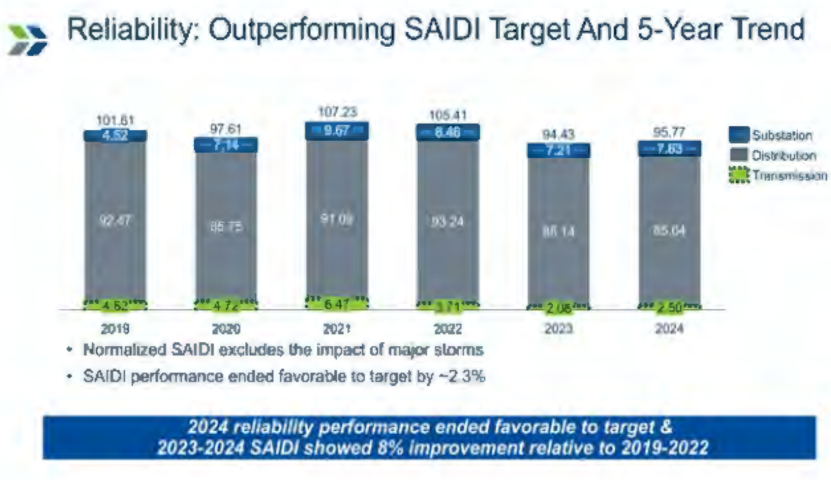
More generally, a balanced scorecard that focuses on all aspects of performance—including reliability, safety, operations, customer service and financial performance—better assures balanced strategies and decision-making prospectively. In short, if the Company is performing poorly financially, attention and resources are drawn to address financial performance issues, and thus those resources are drawn away from matters that more tangibly affect customers on a day-to-day basis, including customer service, reliability and safety. Alternatively, metrics and performance criteria focused on reliability and customer service without balanced measurement of financial performance can result in an imbalanced approach to incentives without appropriate cost/benefit considerations. Therefore, financial performance is a necessary aspect of EKC's ability to properly serve its customers.

Q. How specifically does incentive pay, i.e. compensation that is "at-risk" help generate benefits to customers, and why is it an important part of how EKC reinforces its mission?

A. In simple terms, incentive compensation rewards and reinforces desirable decisions and behaviors. Incentive compensation metrics encourage employees to strive for performance, both at an employee and at a company level, in important areas which are substantially centered around reliability, safety, efficiency, and financial performance. This helps improve operations and practices that lead to favorable outcomes that directly and substantially benefit customers. EKC has seen real-world evidence of these strategies at work, directly impacting affordability by driving efficiency and productivity improvements. As shown below, EKC has used practices like appropriately-crafted incentive compensation strategies, to create substantial operational cost savings, including a reduction of adjusted operation and maintenance costs by 25% since 2018.



Results have not only been evident in affordability measures. These strategies have also helped produce positive results in reliability measures, demonstrated by the fact that EKC has outperformed system average interruption duration index ("SAIDI") targets over recent years, and showed 8% improvement in SAIDI metrics in 2023-2024 relative to 2019-2022.



These statistics demonstrate how strategies like those employed by EKC's incentive compensation plan have direct and real-world impacts that substantially benefit customers in areas of affordability and reliability. These strategies are fundamental to EKC's execution of its mission for the benefit of its customers.

This all underscores EKC's belief that it is important to utilize a compensation structure that is competitive both as to base pay, and as to the type and amount of incentive pay as well. Incentive or variable pay that is "at-risk" is an essential part of paying a market-competitive rate of pay, while enabling the compensation structure to provide the right incentives to employees. The targets that are established for each category---base and variable pay---are designed to bridge the gap between the median market base pay and the median market targeted total compensation. EKC must be competitive in both base pay and total compensation. It is the inclusion of the at-risk components of EKC's compensation structures that allows those structures to be helpful tools in incentivizing desirable behavior and outcomes. In other words, if EKC focused only on providing competitive total compensation, and provided all of that compensation in the form of assured base salary, EKC's compensation system would not provide adequate incentives and rewards for positive performance. This would not be desirable for the Company, and would not stimulate performance and outcomes that benefit customers in the incentivized areas of safety, reliability and cost maintenance. Therefore, at-risk compensation is a vital component to how EKC motivates and incentivizes its management and employees at all levels to operate in a way that generates benefits to customers.

III. EKC'S RELEVANT COMPENSATION PLANS

Q. Please identify EKC's short-term incentive compensation plans relevant to your testimony.

A. As discussed above, EKC's short-term incentive compensation plans I will discuss in my testimony are its Variable Compensation Plan ("VCP") offered to non-union employees, its Annual Incentive Plan ("AIP") offered to executive officers of the Company, and the

Wolf Creek Performance Achievement Reward ("PAR") offered to Wolf Creek union employees.

Q. Please describe EKC's VCP.

A. The VCP is designed to reward non-union employees for their contributions to meeting individual performance and overall Company objectives consistent with EKC's overall mission. Under the plan, a qualified employee is eligible to receive additional compensation based on the evaluation of the employee's individual performance and overall Company performance pursuant to various metrics referred to as Plan Components. Although the incentive opportunity is determined by overall performance of the Plan Components, the actual amounts paid to an employee are based on employee performance and subject to the discretion of division officers, in conjunction with Company leadership. A copy of the VCP is attached as **Exhibit LE-1**.

Q. Please describe the AIP for EKC executives.

A. The AIP is the short-term incentive compensation plan for executive officers of EKC as approved by the Company's Compensation and Leadership Development Committee, or the Board of Directors. Similar to the VCP, the AIP provides additional incentive pay to eligible executive employees based on employee and Company performance measured by the same set of Plan Components or metrics as are used in the VCP. Although it employs the same set of Plan Components as are utilized in the VCP, the Plan Components may be weighed slightly differently under the AIP than the VCP, given that the AIP is a plan reserved for executive-level employees. A copy of the AIP is attached as **Exhibit LE-2**.

Q. What are the Plan Components evaluated under the VCP and the AIP?

A. The Plan Components are fully set forth on page 3 of the VCP attached as **Exhibit LE-1**. These are the Plan Components for both the VCP and the AIP, and they consist of the following:

- Financial metrics (EPS and NFOM),
- Operations metrics (SAIDI, SAIFI and Unplanned Commercial Availability Factor),
- Customer Experience metrics, including residential customer satisfaction surveys, business customer satisfaction surveys, and call center surveys,
- Safety metrics, including Days Away, Restricted or Transferred (DART Rate), Preventable Vehicle Accident Rate, and Percent of Potential Severe Injury or Fatality (PSIF).

Q. Are the Plan Components defined, and are there examples of a calculation using those Plan Components?

A. Yes. Appendix A of the VCP includes definitions of the various plan metric components, and Appendix B is a demonstrative sample pool calculation showing how payout under the policy would be calculated using hypothetical weight percentages. NFOM is not defined in Appendix A, but in general, NFOM measures operations and maintenance costs of EKC's various systems as a whole, excluding fuel costs, to evaluate whether the Company is taking steps to prudently maintain lower costs for operations and maintenance of its systems.

Q. Do customers benefit from positive performance in NFOM, i.e. lower NFOM costs?

A. Yes, customers directly benefit from lower NFOM costs. If EKC's costs for operations and maintenance are lower, those cost savings can be passed along to customers in the form of lower rates. Therefore, performance and efficiency in NFOM has direct and tangible benefits to customers.

Q. How are the Plan Components weighed under the VCP and AIP?

A. I am attaching as **Exhibit LE-3** the Corporate Scorecards for the relevant period showing how each Plan Component is weighed between the VCP and the AIP. As an example, the 2024 Corporate Scorecard is shown below:

2024 Corporate Scorecard

OBJECTIVE		MEASURE		AIP Weight	VCP Weight
1.	SAFETY	1.1	**Weighted Basket of Measures:** - DART Rate (50%) - Preventable Vehicle Accident Rate (25%) - Percent of Potential Severe Injury or Fatality (PSIF) Incidents Investigated With Plans on Track (25%)	12.5%	12.5%
2.	OPERATIONS	2.1	**Weighted Basket of Measures:** - SAIDI (minutes interrupted per customer) (50%) - SAIFI (interruptions per customer) (50%)	7.5%	15.0%
		2.2	**Unplanned Commercial Availability Factor (%)**	7.5%	15.0%
3.	CUSTOMER EXPERIENCE	3.1	**Weighted Basket of Measures:** - JD Power: Residential Customer Satisfaction (30%) - Call Center Survey (35%) - Business Customer Satisfaction Surveys (Top Three Box Score) (35%)	7.5%	15.0%
4.	FINANCIAL	4.1	**Adjusted Earnings per Share**	32.5%	5.0%
		4.2	**Adjusted NFOM ($ in millions)**	32.5%	37.5%
				100.0%	100.0%

Q. Are the weighted percentages consistent throughout the relevant period?

A. The weighted percentages were the same in 2022 and 2023 as are represented above in the 2024 Scorecard.

Q. Please describe EKC's PAR plan.

A. The PAR (Performance Achievement Reward) program is a short-term incentive compensation program for union employees at Wolf Creek to promote and communicate company direction and provide employee ownership for achieving company goals. Pursuant to the PAR program, incentive compensation for eligible employees is calculated and paid based upon a separate set of metrics determined by the Wolf Creek Board. These metrics are heavily weighted by safety measures (50%) and operations measures (40%), with the remaining weight shared equally between both EPS and NFOM measures (10%)

IV. EKC'S LONG-TERM INCENTIVE PLAN

Q. Please describe EKC's long-term incentive compensation plan.

A. Pursuant to its long-term incentive compensation plan, EKC provides equity incentive compensation in the form of restricted stock units (RSUs) to director level employees and executive employees split between Performance-Based RSUs and Time-Based RSUs as defined annually in the plan documents. As an example, for the 2024 grants, director level employees are eligible to receive an annual RSU award where the award is split between 50% Performance-Based RSUs and 50% Time-Based RSUs. Executive employees are eligible to receive an annual RSU award where the award is split between 75% Performance-Based RSUs and 25% Time-Based RSUs. Time-Based RSU vesting is based on the passage of time. Performance-Based RSU vesting is based on the passage of time and performance of the metrics established in the annual award. The performance metrics outlined in the Performance-Based RSU are based on longer-term strategic performance related to long-term goals and metrics of the company, including financial and operational metrics.

Q. What is the purpose of providing equity compensation to employees?

A. Providing equity incentive compensation to employees is intended to ensure that EKC is providing market-based and competitive pay to its current and prospective leadership level employees. The metrics utilized for EKC's long-term incentive plan awards are intended to align interests of management with the overall performance of the Company, and to encourage management to focus efforts on overall performance that create long-term benefits for both shareholders and customers. In addition, it is intended to provide competitive long-term incentive opportunities for eligible employees, and to provide a retention incentive for key employees to encourage and aid in retention of quality employees and leaders in the organization.

Q. How do the Long-Term equity benefits help benefit customers?

A. First, as with other competitive compensation packages, the long-term equity compensation is an important tool available to attract and retain quality employees and leaders within the organization. By enabling EKC to attract high-caliber employees and retain those employees to become long-term leaders of the organization, EKC helps ensure that it can execute a long-term strategy consistent with its mission to provide affordable, reliable and sustainable service to its customers and communities. This alignment encourages leaders to make decisions that will benefit customers over both the short and the long term. In addition, the long-term equity compensation has the added benefit of helping align the interests of individual leaders receiving those benefits with the interests of the Company, including the interests in operational performance, safety, reliability of service, and cost conscious and prudent business practices. By cultivating and retaining long-term leaders of the organization, EKC is able to maintain leader and business continuity, reduce costs related to attrition, and better execute on its mission to serve its customers.

Q. Do you believe it is reasonable to consider long-term equity incentives as part of EKC's costs to serve its customers?

A. I do believe EKC's long-term equity compensation program provides tangible benefits to customers, and therefore it is reasonable to recover a reasonable portion of those costs from customers. I also would agree that, in addition to customer benefits, shareholders of EKC also benefit from positive aspects of the long-term equity compensation plan for many of the same reasons discussed above related to customer benefits. I understand that in recognition of these shared benefits, EKC has decided to remove 100% of performance-based long-term equity compensation paid to executive-level employees, and 50% of its time-based long-term equity compensation paid to executive-level employees from its rate request in this case. This is a reasonable allocation in recognition of the benefits flowing to both shareholders and customers related to EKC's long-term equity incentive plan as applied to executive-level employees.

Q. Why does EKC believe it is important to include costs related to long-term incentive compensation paid to director level employees?

A. Director level employees are often the employees most responsible for management of the Company's operational functions on a day-to-day level. To be able to hire and retain exceptional director-level employees, it is of utmost importance that EKC provide market-competitive compensation, both in terms of the amount and type of compensation paid to such employees, which includes meaningful long-term incentive compensation and incentive-based equity awards. Just as important, EKC believes that at ascending levels of responsibility, impact and expertise, such as at director positions, it is increasingly important to have even higher levels of total compensation provided through incentive pay or at-risk compensation. This is not only a philosophical belief within EKC, but also generally borne out through benchmarking data and information in the market. As such, incentive compensation of all forms paid to director-level employees, importantly including equity awards and compensation, is perhaps the most essential form of incentive compensation for EKC's ability to carry out its mission to provide safe, reliable and affordable service to its customers. Because such at-risk compensation to director level employees is so essential to EKC's operations and execution of its mission, EKC has been and remains steadfast that variable director compensation, including long-term variable equity compensation paid to directors, should be recoverable in rates.

V. RATEMAKING TREATMENT OF VARIOUS INCENTIVE COMPENSATION COSTS

Q. What portions of EKC's incentive compensation costs has EKC requested to recover in the current docket?

A. As stated in the Direct Testimony of Ronald Klote filed in this docket, EKC made certain adjustments to the total incentive compensation paid to arrive at the amount it is requesting to recover in rates in this docket. Specifically, EKC annualized the amount of incentive compensation it incurred based on a three-year average of actual payouts for the 2022 and 2023 plan years, as well as an estimate of the 2024 plan year. EKC then further adjusted those annualized amounts to remove all incentive compensation that was associated with metrics tied to earnings per share ("EPS") for the AIP, VCP and PAR.

EKC also included averages for the Power Marketing incentive plan actual payouts for these relevant years but only included incentive compensation paid to the Power Marketing group based on asset-based management metrics.

With respect to long-term incentive compensation, EKC included performance-based equity incentives for non-executive employees and time-based equity incentives for employees and directors. EKC removed 100% of the performance-based incentives and 50% of the time-based incentives for its executives.

Q. Are you familiar with recent Commission orders regarding recovery of incentive compensation in rates?

A. I have reviewed the Commission's Order in Docket No. 19-ATMG-525-RTS, *In the Matter of the Application of Atmos Energy Corporation for Adjustment of its Natural Gas Rates in the State of Kansas* ("19-525 Docket"). Specifically, in paragraph 46 of the Order in the 19-525 Docket, the Commission cited prior orders regarding incentive compensation in other notable recent dockets, specifically Docket No. 10-KCPE-415-RTS ("10-415 Docket") and Docket 12-KCPE-764-RTS ("12-764 Docket"). The Commission affirmed its intent to disallow costs of management incentive programs that focus primarily on financial criteria. The Commission reasoned that financial performance measures, for instance those tied to share price, primarily lead to benefits to shareholders as opposed to customers, and that as a result incentive compensation costs tied to those metrics should be borne by shareholders as opposed to customers. Specifically, in the 19-525 Docket, the Commission found that Atmos' short-term management incentive plan was heavily weighted toward financial criteria, and therefore removed all such costs from the company's rate request. In addition, the Commission removed 50% of the time-based long-term incentive plan costs, and 100% of the performance-based long term incentive plan costs.

Q. Are EKC's rate requests with respect to its short-term incentive compensation costs consistent with the Commission's order in the 19-525 Docket?

A. Yes, they are. As stated above, in its direct filing, EKC made adjustments consistent with the Commission's Order in the 19-525 Docket. Specifically, EKC excluded all incentive compensation that was associated with metrics tied to earnings per share ("EPS") for the AIP, VCP and PAR.

Therefore, EKC already removed the portion of those costs related or tied to the financial criteria, and no additional adjustments are needed to the short-term incentive compensation costs.

Q. Are EKC's rate requests with respect to its long-term incentive compensation costs consistent with the Commission's Order in the 19-525 Docket?

A. Yes. In its direct filing EKC made adjustments to its long-term incentive compensation plan to remove 100% of the performance-based incentives and 50% of the time-based incentives for its executives. This is consistent with the Commission's Order in the 19-525 Docket.

Q. Do you agree with positions advocated by CURB and Staff seeking to remove all or a substantial portion of short-term incentive compensation costs related to NFOM criteria?

A. No, I do not agree with these positions. As discussed above, although performance in NFOM metrics does have impacts on finances of the Company, it notably also has substantial benefits for customers as well. Efficiencies and costs saved in operations and maintenance directly reduce or limit the Company's cost of service, which is generally the measure of what the Company is permitted to recover through customer rates. Therefore, costs saved due to performance in NFOM metrics directly lead to lower costs and more affordable service to customers. As a result, performance in NFOM metrics arguably more directly benefits customers through rate savings than it does shareholders. Notably, CURB and Staff do not analyze or acknowledge the clear benefits provided to customers related to performance in NFOM metrics. Rather, CURB and Staff seem to argue that because NFOM is labeled a financial metric, costs related to that metric should be excluded, notwithstanding the seemingly obvious fact that NFOM performance results in clear and direct benefits to customers. I do not believe this is an appropriate approach, and it should not be adopted by the Commission.

Q. Do you agree with any approach that summarily removes or disallows entire categories of incentive compensation costs?

A. I would disagree with any such approach. A fundamental principle of ratemaking is that the utility must be allowed a reasonable opportunity to recover its prudent costs incurred in the course of providing service to its customers. I believe that any rule or approach that requires disallowance of wholesale categories of costs simply because they are categorized as being driven by financial metrics without examining the specific facts regarding the nature of the costs incurred, and the benefits to customers flowing from such costs fails to provide utilities a reasonable opportunity to provide support for inclusion of such costs in rates. As such, it fails to allow utilities a reasonable opportunity to recover such costs if prudently incurred for the provision of service, and if beneficial to customers.

Q. How do you apply this rationale to CURB's removal of 100% and Staff's removal of 50% of incentive compensation costs based on NFOM metrics?

A. I believe that neither approach is appropriate, and I believe that both arguments fail to consider the actual benefits provided to customers by EKC's short-term incentive compensation keyed to NFOM metrics. In review of Staff's and CURB's testimony in support of these positions, it is evident that both CURB and Staff witnesses rely almost exclusively on the label of NFOM as a financial metric. Relying solely on labels as opposed to examining the specific purposes and benefits derived from such compensation is not consistent with fundamental principles of rate-making and is therefore inappropriate.

As I discussed above, EKC's short-term incentive compensation plan, and its compensation regimes as a whole, are designed to provide competitive levels and types of compensation, to align compensation plans with appropriate incentives that support the Company's mission and benefit EKC customers, and to reinforce company strategies that enable EKC to provide safe, reliable and affordable service to its customers.

Q. Why do cost control metrics like NFOM help incentivize decisions that benefit customers?

A. A balanced approach that incentivizes decisions and strategies that favor all aspects of EKC's mission—safety, reliability *and affordability*—among all employees is an important tool to help assure that all aspects of its mission receive meaningful attention and consideration. Incentivizing employees to be attentive to and mindful of important costs of service, including operational and maintenance costs, helps support the affordability pillar of EKC's mission. Without meaningful cost-related incentives, employees may be incentivized to make decisions that are favorable to other concerns but are not cost-conscious. Incentive compensation tied to cost metrics aligns employee decision-making with pro-affordability outcomes, and encourage cost control and accountability, which substantially benefits customers.

Q. How do you respond to CURB's adjustment removing 100% of costs related to long-term incentive compensation expenses?

A. I disagree with this approach. Like short-term incentives, awards and payments under EKC's long-term compensation plan support many incentives and practices that create substantial benefits for customers. EKC made adjustments to its long-term incentive compensation paid to executive employees at the time of filing its direct case which were consistent with the Commission's analysis and instruction in the 19-525 Docket. Importantly, as discussed above, EKC believes variable compensation paid to director-level employees, including, and in particular, variable equity compensation such as long-term incentive compensation awards paid to such employees, is a vital and essential aspect of its compensation structure. Because of the position and responsibility afforded to director-level employees, and the impact they have on operational performance of the company, EKC believes it is fundamental to the service it provides to its customers to have substantial levels of compensation for director-level employees be at-risk and tied to performance metrics. EKC respectfully maintains that the importance of such forms of incentive compensation to EKC's ability to generate benefits to customers clearly warrants inclusion of such costs in cost of service to be recovered in rates. Therefore, the Commission should reject positions asserted by Staff, CURB and intervenors removing costs for long-term incentive compensation paid to director level employees.

VI. POWER MARKETING

Q. Please describe the Power Marketing incentive plan.

A. As described in the direct testimony of Ron Klote, the Power Marketing incentive plan covers a group of employees whose responsibility is managing EKC Inc.'s load and its owned assets in the marketplace. The group also serves a secondary purpose in that it provides and shares resources and functions to manage assets for customers and other contracting parties in the marketplace, and to execute non-asset-based energy trading. This resource sharing creates efficiencies and benefits to EKC, and importantly lowers costs at which EKC provides service to its customers. Incentive amounts from the base incentives paid to the Power Marketing group were split according to the percentage of asset metrics to non-asset metrics. Only amounts related to asset metrics were included in the three-year average included in EKC's rate request, and any incentive amounts from purely non-asset-based market activity are not included in EKC's request in this case.

Q. Are members of the Power Marketing group also eligible for incentive compensation under other incentive compensation plans discussed above, like the VCP or AIP?

A. No. Members of the Power Marketing group are not eligible for VCP or AIP. They participate in a separate Power Marketing group incentive plan.

Q. Do you believe it is appropriate to include incentives paid to the Power Marketing group in EKC's ratemaking request in this docket?

A. Yes, I do. As with other incentive plans discussed in my testimony, the Power Marketing incentive plan has substantial benefits to customers in the form of reduced cost of energy acquired by the group, and additional support for efficiency and reliability of the system by way of the group's maintenance and oversight of EKC's load in general. In these roles, the Power Marketing group provides substantial benefits to EKC customers. In addition, I believe EKC's request to include only costs related to asset metrics, as opposed to those paid based upon metrics related to non-asset market-based activities, draws an appropriate correlation between the benefits provided to customers by the Power Marketing group and the inclusion of the incentives paid to the members of the group in Company rates.

Q. Do you agree with the positions taken by CURB witness Garrett and KIC Commercial Group witness Michael Gorman removing all costs related to the Power Marketing incentive compensation plan?

A. No. Consistent with my testimony related to the short-term incentive plans, the Power Marketing group provides tangible and important benefits to customers, particularly related to its management of EKC's owned assets and its load. The incentive plan not only promotes and incentivizes this group to utilize its substantial skill to minimize cost risks and obtain cost-favorable trading outcomes for EKC's load and related to EKC's owned assets, it also provides a market-competitive compensation structure that is necessary to attract and retain Power Marketing employees. The Power Marketing group is vital to EKC's operations and its ability to provide reliable, safe and affordable service to its customers, and therefore it is reasonable to include the costs related to the Power Marketing incentive compensation plan in the cost of service to be recovered in rates.

Q. Does this conclude your testimony?

A. Yes.

2024 Variable Compensation Plan

1) PURPOSE

The Evergy Variable Compensation Plan ("the Plan") is designed to reward non-union employees for their contribution to meeting department, division, and overall company objectives.

2) ELIGIBILITY

The Plan is effective January 1, 2024, through December 31, 2024. In order to be eligible for this Plan, an employee must be:

- A non-union employee of Evergy
- Regularly scheduled to work a minimum of 24 hours per week
- Employed with the company in a non-union position during the Plan year and on the date of the Plan payment (1)
- Officers, temporary employees, and employees who participate in another Company sponsored plan are not eligible for this Plan

(1) Employees who become inactive due to retirement are eligible for a pro-rated amount paid at target (for number of days active in the Plan year). Payment is processed with final paycheck. Employees who become inactive due to death or long-term disability are eligible for a pro-rated amount (for number of days active in the Plan year) and payment is processed in the final regular paycheck, or within 30 days of notification of change in status.

Employees who are terminated for cause or voluntarily terminate during the Plan Year are ineligible.

3) OVERVIEW

Pool Funding: A variable compensation "pool" is created for each division based on Plan performance. The "pool" is the total of the compensation targets for each active employee in the division (eligible earnings times the pay grade target) as of December 31 of the plan year. Employee performance is not accounted for in the pool funding.

Pool Payout: Leaders have full discretion, within the plan funding limits, to determine each employee's variable compensation amount. The overall payout is rolled up and approved by the division officer.

4) VARIABLE COMPENSATION TARGET

An employee's variable compensation target amount, while not a guaranteed amount, is a percentage of the employee's eligible earnings as of the Plan Year end date on December 31. Eligible earnings for an exempt employee are base pay. Eligible earnings for a non-exempt employee are base pay and overtime. The actual amount paid to an individual employee is likely to vary from this target based upon Plan performance, employee performance and leader discretion. Division officers, in conjunction with leadership, will determine the final amount provided to each employee.

Proration Treatment

The compensation amount may be prorated in the following circumstances:

- An employee who is hired during the Plan Year, may receive a prorated award based on the number of days remaining in the Plan Year following the hire date.
- An employee who is not actively at work during the full Plan Year because of retirement is eligible to receive a prorated award based on target and the number of days of active employment during the year.
- An employee who is not actively at work during the full Plan Year because of death or approved Long Term Disability, is eligible to receive a prorated award based on plan target and the number of days of active employment during the year and payment is processed in the final regular paycheck, or within 30 days of notification of change in status.
- An employee who transfers from a bargaining unit position to a non-union position during the Plan Year will be eligible to participate in this Plan on a prorated basis for days in the non-union position.
- Part-time employees will be eligible for a prorated amount based on their scheduled work hours. Awards paid under this Plan to an employee who works on a full-time basis for part of the Plan Year and on a part-time basis (at least 24 hours per week) for part of the Plan Year will be prorated.

Proration of awards under the Plan for any reason will be based on days in the Plan.

5) PLAN COMPONENTS

The Plan funding is based on the overall performance of the Plan components.

The Plan Administrative Committee (PAC) approves the component weightings and validates the achievement levels for the Plan components. Year-end results against the Plan components will be approved by the PAC, validated by the Controller and Compensation Department and are subject to review and confirmation by the Internal Audit Department.

Any changes to company objectives and/or measures in the Plan Year must be approved by the PAC, tracked by the Controller and Compensation Department and are subject to review by the Internal Audit Department throughout the Plan Year.

All plan components align with the Company Scorecard and the final company scorecard performance approved by the PAC supersedes all other scorecard references in this plan. Unless otherwise outlined, achievement percentages are interpolated between 50% and 200%.

Plan Component Performance	Payout %
Below Threshold Performance	0%
Threshold Performance	50%
Target Performance	100%
Stretch Performance	150%
Superior Performance	200%

Financial – 42.5%	
Measure	**Component Weight**
Adjusted Earnings per Share	5.0%
Adjusted NFOM (Non-Fuel O&M)	37.5%

Operations – 30.0%	
Measure	**Component Weight**
Unplanned Commercial Availability Factor	15.0%
SAIDI (minutes interrupted per customer) (50%) SAIFI (interruptions per customer) (50%)	15.0%

Customer Experience – 15.0%	
Measure	**Component Weight**
JD Power: Residential Customer Satisfaction (30%) Business Customer Satisfaction Surveys (top three box score) (35%) Call Center Survey (35%)	15.0%

Safety – 12.5%	
Measure	**Component Weight**
DART Rate (Days Away, Restricted, or Transferred) (50%) Preventable Vehicle Accident Rate (25%) Percent of Potential Severe Injury or Fatality (PSIF) Incidents Investigated with Plans on Track (25%)	12.5%

Safety payout may be reduced by 50% of performance in the event of a fatality.

6) PAYMENT

Payments under the Plan will be made on or before March 15 following the Plan Year. Plan awards are taxed as supplemental earnings.

7) PLAN ADMINISTRATION

The Chief Executive Officer and SVP Chief Human Resources & Diversity Officer of Evergy make up the PAC and the CEO retains the authority to amend the composition of the PAC, including changes in membership deemed necessary or prudent.

The PAC retains the sole discretion to interpret, modify, suspend, amend, or terminate this Plan at any time for any reason. Any modification or addendum to this Plan shall be effective on the date specified in such modification or addendum. The PAC will conclusively govern participation, Plan performance, Plan payout and all other matters necessary to administer this Plan.

Nothing in this Plan shall change the normal employee/employer relationship or be interpreted as a guarantee of continued employment. This Plan or any action taken hereunder shall not be construed as giving any right to be retained as an employee of Evergy. Even though performance expectation criteria are in place, no payment from the Plan should be construed as an indication that overall job performance is satisfactory.

8) KEY DEFINITIONS

"Plan" or "the Plan" means the Variable Compensation Plan.

"Plan Year" means January 1, 2024, through December 31, 2024. This Plan remains in effect until it is terminated, modified, or amended.

"PAC" is the Plan Administrative Committee for the Variable Compensation Plan.

Approval: David A Campbell

David Campbell
Chief Executive Officer

Date: 3/11/24

Appendix A – 2024 Plan Metric Definitions

- **Unplanned Commercial Availability Factor** measures how often our generating units are available, adjusted for planned outages when market conditions are favorable compared to our cost to generate electricity and promotes economical dispatching of our units.

- **SAIDI** (System Average Interruption Duration Index) is an industry standard measurement of electrical outages. The index represents the average length of time (in minutes) that a customer experienced sustained electrical outage on the utility's system during the year. The measurement defines the combined system outage duration and outage frequency in one measure as applied to the entire customer base served.

- **SAIFI** (System Average Interruption Frequency Index) is an industry standard measurement of electric outages. The index represents the number of electrical outages a customer experiences during the year.

- **DART** (Days Away, Restricted, or Transferred Rate) is a safety measure that describes the number of recordable injuries per 100 full-time employees that resulted in days away from work, restricted work activity, or job transfer that the Company has experienced.

- **PVAR** (Preventable Vehicle Accident Rate) is a safety measure determined by calculating the number of preventable accidents times one million miles driven divided by total vehicle miles.

- **Percent of Potential Severe Injury or Fatality (PSIF) Incidents** measures the incidents with a release of high energy in the absence of a direct control where a serious injury is not sustained – generally reported as a “near miss” or “safety incident”.

- **JD Power: Residential Customer Satisfaction** measures Evergy’s CSAT (customer satisfaction) against the leading utility in the Midwest Large (MWL) sector which mitigates the historic volatility of this measurement by benchmarking against leading utility performance in the scorecard year rather than setting the scorecard on the historic performance of the MWL sector in the previous year.

- **Call Center Surveys and Business Customer Satisfaction Surveys** measure customer perception at the end of the transaction.

Appendix B – Sample Calculation

Example of Pool Calculation

Plan Component	Weight	Payout Percent	Weighted Payout Percent
Company Financial	42.5%	115.00%	48.88%
Company Operational	30.0%	101.25%	30.38%
Customer Experience	15.0%	100.00%	15.00%
Safety	12.5%	100.00%	12.50%
Overall Calculated Payout Percentage			**106.76%**

In this example, the division target pool total would be multiplied by the Overall Calculated Payout Percentage of 106.76% to determine the pool funding available to be distributed to employees.

Evergy, Inc.
Executive Annual Incentive Plan
(Effective as of January 1, 2024)

Objective

The Evergy, Inc. (the "Company" or "Evergy") Executive Annual Incentive Plan (the "Plan") is designed to motivate and reward officers of Evergy for the achievement of specific key financial, operational and business goals. By providing market-competitive target awards and additional award opportunities for extraordinary achievements and results, the Plan both supports the attraction and retention of senior executive talent critical to achieving the Company's strategic business objectives and provides financial incentives to reward key performers.

Eligibility

Eligible participants ("Participants") shall be the named executive officers ("NEOs") and non-NEOs of the Company as approved by the Compensation and Leadership Development Committee ("Committee") or Board of Directors (the "Board") of the Company.

Administration

The Committee and/or the Board has the full power and authority to (i) interpret the provisions of the Plan, (ii) determine the terms and conditions of any award, (iii) amend the terms or conditions of any award, (iv) determine whether, and to what extent, awards may become vested, paid (in full or in part), forfeited or suspended, (v) establish, amend, suspend or waive any payment conditions for an award or rules relating to the administration of the Plan, (vi) delegate all or part of its authority under the Plan to one or more directors and, with respect to the day-to-day administration and operations of the Plan (but not granting of awards or any determination of any amounts eligible to be paid under the Plan) to officers of the Company and (vii) make any other determination or take any action that is deemed necessary or desirable for the administration of the Plan or the payment of awards thereunder. All determinations and decisions made by the Committee pursuant to the provisions of the Plan shall be final, conclusive and binding on all persons, and shall be given maximum deference permitted by law.

Awards

Awards and award levels are developed and approved by the Committee, who may seek the input of the Company's management and outside consultants and advisors and may further seek approval by the full Board. Awards, which may vary based on the Participant's level of responsibility, market data, internal comparisons and other factors the Committee believes is appropriate, may be (i) established as a percentage of the Participant's base salary, (ii) established as an absolute amount or (iii) established based on any other factor or criteria.

Performance Period and Incentive Objectives

The Plan will be effective as of January 1, 2024 and end on December 31, 2024 (the "Performance Period") unless the Committee in its sole discretion desires to have a different Performance Period. The Committee will establish and approve, and if applicable, submit for approval by the Board, specific annual objectives and performance levels that are applicable to each Participant, which annual objectives and performance levels may be based on any performance goal or criteria the Committee believes is appropriate. The amount of a Participant's award will be determined in the Committee's discretion and may differ from Participant to Participant, based on performance against the specific objectives and performance levels approved by the Committee. The Committee may adjust or modify the established annual objectives or performance levels, or the determination of any performance goals or criteria, in its discretion at any time and for any reason.

Payment of Awards

Payment Timing. Except as otherwise set forth in this Plan, earned awards will generally be payable to each Participant after the completion of the Performance Period and as soon as administratively practicable following the determination by the Committee of the achievement level for the performance goal(s) and each of the relevant objectives relating thereto. The awards will be paid, in the sole discretion of the Committee, in cash, Company stock (in the form of "Bonus Shares" as defined and under the Company's Long-Term Incentive Plan ("LTIP"), as may be amended or restated), or a combination of cash and stock, except to the extent receipt of payment is properly deferred under the Company's Nonqualified Deferred Compensation Plan (the "NQDC Plan"). Any earned award for which a deferral election has been made under the NQDC Plan will result in a cash award being deferred, as Bonus Shares are not eligible to be deferred under such plan. Except to the extent deferred under the NQDC Plan, in no event shall payment be made later than the 15th day of the third month following the end of the taxable year in which the Committee's determination of award achievement is made.

Continuous Employment Required. Except as set forth below, or as otherwise provided for in the Company's executive severance plan or in any change-in-control severance agreement between the Participant and the Company, a Participant must be employed by the Company or one of its subsidiaries at the time of payment under this Plan to be entitled to payment of an award, if any.

Miscellaneous

Extraordinary Employment Situations.

> Employment after Commencement of Performance Period. An award for a person who becomes a Participant during a Performance Period will be prorated unless otherwise determined by the Committee.
>
> Termination of Employment during the Performance Period for Death or Disability. If a Participant experiences a termination of employment on account of the Participant's death or Disability, as defined in the Company's Long-Term Disability Plan, before the end of the Performance Period, then, as of the date of the Participant's termination of employment, the Participant (or, in the case of death, the Participant's estate) will be entitled to a pro rata portion of the target award for the fiscal year in which the termination of employment occurs. The pro rata portion of the Participant's target award shall be determined by multiplying the target award for the year in which the termination of employment occurs by a fraction, the numerator of which is the number of calendar days elapsed in the Performance Period through the date on which termination of employment occurs and the denominator of which is 365. Awards that vest in connection with termination of employment on account of death or Disability, as set forth in this section of the Plan, will be paid in cash in a lump sum as soon as administratively practicable, but in no event later than 30 days after the Participant's death or a determination that the Participant has a Disability, as applicable.
>
> Termination of Employment during the Performance Period for Retirement. If a Participant experiences a termination of employment on account of the Participant's Retirement (as defined below) before the end of the Performance Period, no immediate vesting shall occur at the time of the Participant's Retirement but, following the end of the Performance Period, a pro rata portion of the award shall vest. The pro rata portion of the Participant's target award shall be determined by

multiplying the actual award based on the achieved level of performance for the year in which retirement occurs by a fraction, the numerator of which is the number of calendar days elapsed in the Performance Period through the date on which the Retirement occurs for such year and the denominator of which is 365.

Unfunded Benefits. No benefit provided under this Plan is subject to the Employee Retirement Income Security Act of 1974, as amended, and all benefits under the Plan are unfunded. No Participant shall have any greater right than the right of a general unsecured creditor of the Company.

Amendments and Termination. The Board or the Committee has the exclusive right to terminate, modify, change or alter the Plan at any time.

Clawback or Recoupment. The award will be subject to certain provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 ("Dodd-Frank") and any other compensation clawback or recoupment policy that the Committee has adopted or is required to adopt pursuant to the listing standards of any national securities exchange on which the Company's securities are listed or as is otherwise required by Dodd Frank or any other applicable law. Participant acknowledges that the award or any compensation derived therefrom may be forfeited and/or recouped by the Company in accordance with any policies and procedures adopted by the Committee in order to comply with Dodd Frank or other clawback or recoupment policy. Without limitation, the Company may, in its discretion, or shall as required by law, (i) seek repayment from the Participant; (ii) reduce the amount that would otherwise be payable to the Participant under current or future awards; (iii) withhold future equity grants or salary increases; (iv) pursue other available legal remedies, or (v) any combination of these actions. The Company's clawback or recoupment policy may require the Company take such recoupment actions against the Participant whether or not such Participant engaged in any misconduct or was otherwise at fault with respect to any event or circumstance giving rise to such clawback action.

The Company will, to the full extent permitted by law, have the discretion based on the particular facts and circumstances to require that the Grantee reimburse the Company for all or any portion of any Awards if and to the extent the Awards reflected the achievement of financial results that were subsequently the subject of a restatement, or the achievement of other objectives that were subsequently found to be inaccurately measured, and a lower Award would have occurred based upon the restated financial results or accurately measured objectives. The Company may, in its discretion, (i) seek repayment from the Grantee; (ii) reduce the amount that would otherwise be payable to the Grantee under current or future Awards; (iii) withhold future equity grants or salary increases; (iv) pursue other available legal remedies or (v) any combination of these actions. The Company may take such actions against any Grantee, whether or not such Grantee engaged in any misconduct or was otherwise at fault with respect to such restatement or inaccurate measurement.

Tax Withholding. Any payment or benefit under the Plan is subject to all applicable withholding and other taxes applicable to the entire award, which must be satisfied by the Participant in a manner satisfactory to the Company and in accordance with applicable law before any payment is made under this Plan.

Code Section 409A. It is intended that the payments under the Plan qualify as short-term deferrals exempt from the requirements of Section 409A of the Internal Revenue Code of 1986, as amended ("Section 409A"). In the event that any award does not qualify for treatment as an exempt short-term deferral, it is intended that such amount will be paid in a manner that satisfies the requirements of Section 409A. The Plan shall be interpreted and construed accordingly.

Adopted on February 26, 2024.

Sandra Lawrence

By: ______________________

Chair, Compensation and Leadership Development Committee

Exhibit A

2024 Annual Incentive Plan – 2024 Performance Objectives

Officer Annual Incentive Plan (AIP) Scorecard - 2024

OBJECTIVE		MEASURE		AIP Weight	Targets: Threshold (50%)	Target (100%)	Stretch (150%)	Superior 200%
1.	SAFETY	1.1	**Weighted Basket of Measures:**	12.5%				
			- DART Rate (50%)		0.89	**0.68**	0.51	0.35
			- Preventable Vehicle Accident Rate (25%)		1.23	**1.12**	1.00	0.90
			- Percent of Potential Severe Injury or Fatality (PSIF) Incidents Investigated With Plans on Track (25%)		75.0%	**90.0%**	N/A	N/A
			Safety payout reduced by 50% of performance in the event of a fatality					
2.	OPERATIONS	2.1	**Weighted Basket of Measures:**	7.5%				
			- SAIDI (minutes interrupted per customer) (50%)		106	**98**	94	90
			- SAIFI (interruptions per customer) (50%)		1.06	**1.01**	0.96	0.91
		2.2	**Unplanned Commercial Availability Factor (%)**	7.5%	89%	**93%**	95%	96%
3.	CUSTOMER EXPERIENCE	3.1	**Weighted Basket of Measures:**	7.5%				
			- JD Power: Residential Customer Satisfaction (absolute) (30%)		0.48	**0.40**	0.32	0.24
			- Call Center Survey (35%)		4.18	**4.24**	4.30	4.36
			- Business Customer Satisfaction Surveys (Top Three Box Score) (35%)		90.0%	**92.5%**	95.0%	97.5%
4.	FINANCIAL	4.1	**Adjusted Earnings per Share**	32.5%	$3.63	**$3.83**	$3.98	$4.13
		4.2	**Adjusted NFOM ($ in millions)**	32.5%	$973.8	**$938.6**	$915.1	$891.7
				100.0%	Total weighting			

Officer Annual Incentive Plan Modifier

5.	DIVERSITY, EQUITY, AND INCLUSION	5.1	**C&LD Committee discretionary adjustment** Advancement across three pillars: 1. Marketplace (Supplier Diversity) 2. Workplace (Development & Engagement) 3. Workforce (Talent Pipeline)	+/-10%	**Percentage points additive to the results of objectives 1-4.**

evergy

2024 Corporate Scorecard

	OBJECTIVE		MEASURE	AIP Weight	VCP Weight
1.	SAFETY	1.1	**Weighted Basket of Measures:** - DART Rate (50%) - Preventable Vehicle Accident Rate (25%) - Percent of Potential Severe Injury or Fatality (PSIF) Incidents Investigated With Plans on Track (25%)	12.5%	12.5%
2.	OPERATIONS	2.1	**Weighted Basket of Measures:** - SAIDI (minutes interrupted per customer) (50%) - SAIFI (interruptions per customer) (50%)	7.5%	15.0%
		2.2	**Unplanned Commercial Availability Factor (%)**	7.5%	15.0%
3.	CUSTOMER EXPERIENCE	3.1	**Weighted Basket of Measures:** - JD Power: Residential Customer Satisfaction (30%) - Call Center Survey (35%) - Business Customer Satisfaction Surveys (Top Three Box Score) (35%)	7.5%	15.0%
4.	FINANCIAL	4.1	**Adjusted Earnings per Share**	32.5%	5.0%
		4.2	**Adjusted NFOM ($ in millions)**	32.5%	37.5%
				100.0%	100.0%

Officer Annual Incentive Plan Modifier

5.	DIVERSITY, EQUITY, AND INCLUSION	5.1	**C&LD Committee discretionary adjustment** Advancement across three pillars: 1. Marketplace (Supplier Diversity) 2. Workplace (Development & Engagement) 3. Workforce (Talent Pipeline)	+/-10%	N/A

Percentage points additive to the results of objectives 1-4.

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

VERIFICATION

Lesley Elwell, being duly sworn upon her oath deposes and states that she is the Sr Vice President Chief People Officer, for Evergy, Inc., that she has read and is familiar with the foregoing Testimony, and attests that the statements contained therein are true and correct to the best of her knowledge, information and belief.

Lesley Elwell

Subscribed and sworn to before me this 3rd day of July 2025.

Notary Public

My Appointment Expires:
May 30, 2026

NOTARY PUBLIC - State of Kansas
LESLIE R. WINE
MY APPT. EXPIRES 30, 2026

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed, this 3rd day of July 2025, to all parties of record as listed below:

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