

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

**In the Matter of the Application of)
Evergy Kansas Central, Inc. and Evergy)
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

Cross-Answering Testimony of Justin Bieber

on behalf of

HF Sinclair El Dorado Refining LLC

June 20, 2025

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1 **CROSS ANSWER TESTIMONY OF JUSTIN D. BIEBER**

2 **I. INTRODUCTION**

3 **Q. Please state your name and business address.**

4 A. My name is Justin Bieber. My business address is 111 E Broadway, Suite 1200,
5 Salt Lake City, Utah, 84111.

6 **Q. Are you the same Justin Bieber who pre-filed direct testimony in this docket
7 on behalf of HF Sinclair El Dorado Refining LLC (“HF Sinclair”)?**

8 A. Yes, I am.
9

10 **II. OVERVIEW AND CONCLUSIONS**

11 **Q. What is the purpose of your Cross Answer Testimony in this proceeding?**

12 A. My rebuttal testimony responds to the direct testimony of the Kansas Corporation
13 Commission Staff (“Staff”) witnesses Kristina A. Luke Fry and Lana J. Ellis,
14 Citizen’s Utility Ratepayer Board (“CURB”) witness Glenn Watkins, and Walmart
15 Inc. (“Walmart”) and CCPS Transportation, LLC (“CCPS”) Witness Kavita Maini
16 regarding cost and revenue allocation.

17 **Q. Please summarize your conclusions and recommendations.**

18 A. I provide the following recommendations and conclusions:

- 19 • I recommend that the Commission reject proposals by Staff and CURB to use
20 alternative production cost allocation methods. Instead, I continue to
21 recommend that the Commission approve the Company’s proposed AED-4CP
22 production cost allocation methodology.

- In general, I support Ms. Maini’s and Mr. Watkins’ recommendations to make additional movement towards aligning revenue allocation with the cost of service. However, I disagree with Mr. Watkins proposed modifications to the revenue allocation because they are based on his alternative class cost of service (“CCOS”) studies.

However, regardless of which cost and revenue allocation *methodologies* the Commission approves in this proceeding, for the reasons I explained in my direct testimony, I continue to recommend that the CCOS study separately allocate costs to each of the special contract customers, and that the individual cost allocation results for the HF Sinclair special contract should be utilized to inform the appropriate revenue allocation to the HF Sinclair special contract.

III. COST ALLOCATION

Q. How does Staff witness Kristina Luke Fry recommend that production plant should be classified?

A. Ms. Luke Fry recommends that production plant be classified based on the retail system load factor. She explains that Staff calculated the system load factor as 49.1% energy related and 50.9% demand related.¹

Q. How does Staff recommend that production plant should be allocated?

A. Ms. Luke Fry explains that Staff allocated the 50.9% of production costs classified as demand-related based on the class contribution to the four coincident peak

¹ Direct Testimony of Kristina A Luke Fry, p. 14.

1 (“4CP”) demands, and allocated the 49.1% of production costs classified as energy-
2 related based on loss adjusted energy usage.²

3 **Q. How did Evergy Kansas Central (“EKC” or “the Company”) allocate**
4 **production plant in its proposed CCOS Study?**

5 A. As I explained in my direct testimony, the Company proposed to continue the use
6 of the Average & Excess (“AED”) allocation method, incorporating a four
7 coincident peak measure of demand (collectively “AED-4CP”) to allocate
8 production plant.³

9 **Q. Can you please describe the AED allocation method?**

10 A. The AED method, as described in the National Association of Regulatory Utility
11 Commissioners Electric Utility Cost Allocation Manual (“NARUC Manual”),
12 allocates production plant based on the average energy use and a measure of *excess*
13 demand. According to the manual, the energy weighting is equal to the system load
14 factor and the excess demand weighting is equal to one minus the system load
15 factor.⁴

16 **Q. How does Staff’s recommended production allocation differ from the AED-**
17 **4CP production cost methodology proposed by the Company in its CCOS?**

18 A. There is one key difference between Staff’s recommended allocation methodology
19 and the Company’s proposed AED-4CP method. The AED-4CP method allocates
20 production plant costs classified as demand-related based on *excess demand*, which
21 is calculated as the difference between 4CP demand and average demand. In

² *Id.*

³ Direct Testimony of Justin Bieber, p. 8.

⁴ National Association of Regulatory Utility Commissioners Electric Utility Cost Allocation Manual, pp. 49-50.

1 contrast, Staff's recommended methodology allocates demand-related production
2 plant costs based on the customer class 4CP, which is a measure of total peak
3 demand.

4 **Q. Does Ms. Luke Fry provide any explanation or justification to support Staff's**
5 **proposal to use a different production cost allocation methodology?**

6 A. No, she does not. Ms. Luke Fry merely describes Staff's allocation methodology
7 without explicitly acknowledging that it differs from the methodology used in the
8 Company's CCOS. She does not provide any explanation or justification to support
9 Staff's alternative recommendation.

10 **Q. How does Staff's recommended production cost allocation methodology**
11 **compare to the Peak and Average ("P&A") production cost allocation**
12 **methodology?**

13 A. The P&A cost allocation methodology is a cost allocation methodology that is
14 classified by the NARUC Manual as a judgmental energy weighting methodology.
15 Staff's recommended methodology is similar to the P&A methodology because it
16 is an energy weighted allocation method that uses a measure of peak demand to
17 allocate the production plant classified as demand related. However, Staff's
18 methodology differs from the P&A methodology, as prescribed in the NARUC
19 Manual, in one very important way. While Staff has proposed to classify
20 production plant based on its calculation of the system load factor, the NARUC
21 Manual clearly prescribes a different energy weighting that is not based on the
22 system load factor.

1 According to the NARUC Manual, there are two variants of the P&A
2 allocation method. In the first method, the portion of production plant classified as
3 demand-related is calculated by dividing the annual system peak demand by the
4 sum of the annual system peak demand and the average system peak demand.⁵

$$5 \quad \text{Demand Weighting} = \frac{\text{Annual Peak}}{\text{Annual Peak} + \text{Average Peak}}$$

6 Mathematically, the demand weighting can never be less than 50% because
7 the average peak can never be greater than the annual peak. Consequently, the
8 energy weighting—which is equal to 1 minus the demand weighting—can never be
9 greater than 50%, even for a 100% load factor system.

10 The other variant of the P&A allocation method prescribed by the NARUC
11 Manual utilizes a 12 CP measure of peak demand, with 1/13th, or 7.69% of
12 production plant classified as energy-related, and the remaining 12/13ths, or
13 92.31% classified as demand-related.⁶

14 These variants of the P&A method prescribed by the NARUC Manual
15 clearly do not weight the energy component equal to the system load factor and
16 would result in a significantly lower weighting for the energy component compared
17 to the 49.10% energy weighting proposed by Staff based on its analysis of system
18 load factor.

19 **Q. Why is it appropriate to utilize the system load factor for the energy weighting**
20 **component in the AED methodology but not appropriate to utilize the load**
21 **factor for the energy weighting in the P&A methodology?**

⁵ National Association of Regulatory Utility Commissioners Electric Utility Cost Allocation Manual, p. 57.

⁶ *Id.* p. 58.

1 A. It is important to understand that the appropriate weightings of the energy
2 and demand components differ depending on the cost allocation method that is
3 used. Structurally, the AED method is similar to the P&A method in that they are
4 both energy weighted production cost allocation methodologies. However, one key
5 difference between the P&A method and the AED method is that the P&A utilizes
6 a measure of *peak* demand while the AED method utilizes a measure of *excess*
7 demand. Given this key difference, it is not appropriate to “mix and match” the
8 energy and demand weightings between these two methods.

9 Put simply, the P&A method is different from the AED allocation method.
10 While it is a commonly accepted practice to utilize the system load factor to
11 determine the energy weighted component in the AED method, it is not a
12 commonly accepted practice to utilize the system load factor to determine the
13 energy weighted component in the P&A method.

14 **Q. Do you have any other concerns with Staff’s proposal to allocate production**
15 **costs based on its proposed variant of the P&A methodology?**

16 A. Yes. Structurally, the P&A method utilizes the full value of average demand (the
17 energy divided by hours in the year) in both the “average” component and the peak
18 component of the calculation. As a result, the method “double-weights” the annual
19 energy usage. This structural bias that is inherent to the P&A method, and other
20 energy weighted methods that utilize a measure of total peak demand to allocate
21 demand-related costs, unreasonably disadvantages higher-load factor customers. If
22 the P&A method, or another similar energy weighted cost allocation method that
23 uses a measure of total peak demand to allocate capacity costs is used to allocate

1 the costs of production plant, the energy component weighting should not be
2 modified in a manner that would further exacerbate this biased cost shifting toward
3 higher-load factor customers.

4 **Q. Can you please elaborate regarding the structural bias in the P&A, and other**
5 **variants of the P&A, that utilize a measure of total peak demand, to allocate**
6 **demand-related costs.**

7 A. According to the P&A method, fixed production cost is allocated based on a
8 combination of each class's share of energy usage, as well as each class's share of
9 coincident peak demand.⁷

10 We can use a simple example to illustrate the P&A method and its inherent
11 analytical flaw. Assume we have two customer classes: Flat and Peaky. To
12 highlight the underlying drivers of the P&A method, let us assume that the Flat
13 class has a constant load of 500 MW throughout the year. Let us further assume
14 that the load pattern of the Peaky class is as follows: January-March: 300 MW;
15 April-May: 500 MW; June: 800 MW; July: 900 MW; August: 800 MW;
16 September-October: 500 MW; and November-December: 300 MW. This example
17 is illustrated in Figure JB-1, below.

⁷ *Id.* pp. 57-58.

Figure JB-1
Peak and Average Allocation Method: Illustrative Example

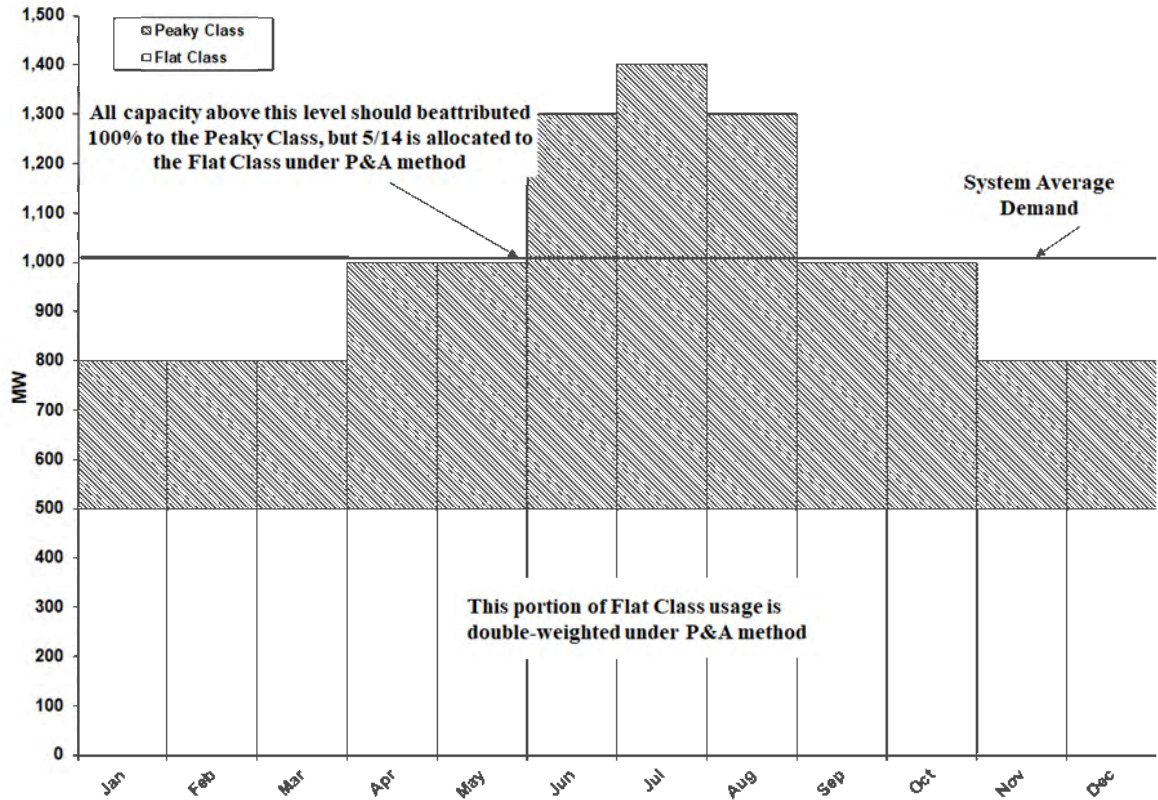


Figure JB-1 shows the monthly demand of the Flat class at the bottom of the diagram. The monthly demand of the Peaky class is stacked on top of the Flat class's demand, such that the sum of the two constitutes the total demand for the system. The average demand of each of these classes is 500 MW, resulting in an average demand for this two-class system of 1,000 MW. Accordingly, the P&A method will allocate each of these classes 50 percent of the responsibility for the energy, or average demand, portion of costs.

The system peak demand of 1400 MW occurs in July. It is clear in this example that all of the incremental capacity required above the system average of 1,000 MW demand is caused by the needs of the Peaky class – after all, the load of the Flat class is, of course, flat. But the P&A method will not allocate the full cost

1 of this incremental capacity to the Peaky class. Instead, it will allocate these
2 incremental costs in accordance with each class's share of total demand during the
3 peak month of July; that is, the Flat class will be allocated 5/14 of the incremental
4 cost and the Peaky class will be allocated 9/14 of the incremental cost. Put another
5 way, even though all of the Flat class's usage during July has already been
6 accounted for in the allocation of average demand, the Flat class will be allocated
7 an additional 5/14 of the costs of the incremental capacity above system average
8 demand when the July peak demand is apportioned.

9 This additional allocation occurs because the P&A method allocates
10 capacity costs based on total demand during July, which includes the average
11 demand and the excess demand. Since the average demand has already been fully
12 allocated in the first step, this additional allocation results in a double-weighting of
13 the average demand, which I referred to above.

14 In my opinion, this double-weighting is an inherent analytical flaw that
15 inappropriately biases the P&A method, and other energy weighted allocation
16 methods that utilize a measure of total peak demand to allocate demand-related costs.

17 **Q. What do you recommend regarding Staff's proposed production cost**
18 **allocation methodology?**

19 A. I recommend that the Commission reject Staff's proposal to classify production
20 related costs based on the system load factor and to allocate the demand related
21 portion based on the 4CP methodology. Instead, I continue recommend that the
22 Commission approve the Company's proposed AED-4CP production cost
23 allocation methodology.

1

2 ***Response to CURB Witness Glenn Watkins***

3 **Q. How does CURB Witness Glenn Watkins recommend that the results of CCOS**
4 **studies should be used in the ratemaking process?**

5 A. Mr. Watkins states that regulators should consider cost allocations only as a guide,
6 with the results being used as one of many tools to assign class revenue
7 responsibility when cost causation factors cannot be realistically ascribed to certain
8 costs.⁸

9 **Q. What does Mr. Watkins' recommend regarding the allocation of production**
10 **plant?**

11 A. Mr. Watkins claims that the Company's proposed allocation of production plant
12 using the AED-4CP is not consistent with the Company's objective to allocate plant
13 considering both energy and peak demand. He claims that his alternative P&A
14 CCOS directly reflects a weighted method of production plant allocation that gives
15 classes a reasonable balance between the energy and capacity function of
16 generating facilities. As a result, he provides three alternative CCOS studies using
17 the 12 coincident peak ("12 CP"), Base/Intermediate/Peak ("BIP"), and P&A
18 methods for allocating production plant, which he alleges more reasonably assign
19 generation costs among customer classes.⁹

20 **Q. What is your assessment of Mr. Watkins' alternative CCOS studies?**

⁸ Direct Testimony of Glenn Watkins, p. 5.

⁹ *Id.* pp. 31-32

1 A. Mr. Watkins' alternative cost allocation methods do not appropriately reflect cost
2 causation given the characteristics of EKC's system. I will address each of these
3 alternative methods in detail below.

4 **Q. When is it be appropriate to utilize the 12 CP allocation methodology?**

5 A. According to the NARUC Manual, a 12 CP allocator can be appropriate when there
6 are not significant variations in demand throughout the year. Specifically, the
7 NARUC Manual states that:

8 *"[t]he utilization of a "12 CP allocation method is based on the*
9 *principle that a utility installs facilities to maintain a reasonably*
10 *constant level of reliability throughout the year or that significant*
11 *variations in monthly peak demands are not present. Under this*
12 *method, no single peak demand or seasonal peak demands are of*
13 *any significantly greater magnitude than any of the other monthly*
14 *coincident peak demands. Thus, the relative importance of each*
15 *month is considered."*¹⁰

16 **Q. Do EKC's retail loads meet the criteria in the NARUC manual for the**
17 **utilization of the 12 CP method to allocate transmission costs?**

18 A. No. EKC's retail peaks vary significantly throughout the year and the seasonal
19 demand clearly peaks during the summer months.

20 **Q. What is your assessment of Mr. Watkins' alternative CCOS study that utilizes**
21 **the BIP method to allocate production plant?**

22 A. I disagree with the underlying premise of the BIP allocation methodology that
23 specific plants can be considered to be serving different components of load.
24 Specifically, I disagree that a baseload plant does not provide any capacity value
25 and should be allocated entirely on the basis of energy. For example, Mr. Watkins

¹⁰ National Association of Regulatory Utility Commissioners Electric Utility Cost Allocation Manual, p. 79.

1 classifies 100% of the costs of Evergy's nuclear unit, with an owned capacity of
2 609 MW, as a base load unit in the BIP methodology¹¹ and allocates 100% of the
3 costs on the basis of energy. This fails to recognize the significant and important
4 capacity value that base load and other high capacity factor resources provide to the
5 system.

6 **Q. Do you have any other concerns with Mr. Watkins' alternative BIP CCOS**
7 **study?**

8 A. Yes. I also have concerns with Mr. Watkins proposed application of the BIP
9 methodology that would classify other production plant as energy-related based on
10 the percent of hours connected to load. For example, based on this methodology,
11 Mr. Watkins' BIP study classifies the Hutchinson plant as 10.26% energy-related¹²
12 even though the annual capacity factor for this resource is only 1.1%. The capacity
13 factor indicates that Hutchinson is clearly a peaking resource that provides capacity
14 to the system. It is not appropriate to classify more than 10% of the fixed costs for
15 a capacity peaking resource like Hutchinson as energy-related.

16 **Q. What is your assessment of Mr. Watkins' alternative CCOS study that utilizes**
17 **the P&A method to allocate production plant?**

18 A. As I explain above, the P&A method utilizes the full value of average demand in
19 both the "average" component and the peak component of the calculation. I
20 disagree that this is an appropriate cost allocation method because this method
21 "double-weights" the annual energy usage which inappropriately skews the cost
22 allocation in favor of higher load factor customers.

¹¹ Direct Testimony of Glenn Watkins, p. 24.

¹² *Id.*

1 **Q. What do you recommend?**

2 A. I recommend that the Commission reject Mr. Watkins' alternative production cost
3 allocation methods. Instead, for the reasons I explain above and in my direct
4 testimony, I continue recommend that the Commission approve the Company's
5 proposed AED-4CP production cost allocation methodology.

6

7 **IV. REVENUE ALLOCATION**

8 **Q. What does Staff witness Lana J. Ellis propose regarding revenue allocation?**

9 A. Ms. Ellis explains that Staff's recommended CCOS study reflects Staff's
10 recommended \$113,770,652 increase in EKC's revenue requirement,¹³ which
11 reflects an overall increase of 9.09%. She further explains that Staff's proposed
12 revenue allocation uses an equal proportion allocation and the CCOS relative rate
13 of return as the lower and upper bounds for Staff's targeted revenue allocation.
14 According to Ms. Ellis, Staff's proposed rate increases move in the direction, but
15 not the magnitude, indicated by the class relative rate of return.¹⁴

16 Staff's recommended revenue allocation is summarized in Table JB-1
17 below.

¹³ Direct Testimony of Lana J. Ellis, p. 7.

¹⁴ *Id.* p. 8.

Table JB-1
Staff Proposed Revenue Allocation¹⁵

Allocation of the Increase in Revenue Requirement			
Among Customer Classes			
	Revenue with Current Rates \$	Actual Increase in Class Revenue	Percentage Increase in Class Share
	(1)	(2)	(3)
Residential	\$ 640,295,893	57,946,778	9.0%
Residential DG	\$ 6,942,311	624,808	9.0%
Small General Service	\$ 139,497,049	12,554,734	9.0%
Medium General Service	\$ 153,360,645	13,802,458	9.0%
Schools Services	\$ 37,527,798	3,660,701	9.8%
Church Service	\$ 1,887,706	184,139	9.8%
Large General Service	\$ 182,367,978	16,413,118	9.0%
Large Power Service	\$ 8,262,314	805,959	9.8%
Interruptible Service	\$ 305,443	29,795	9.8%
Large Tire Manufacturer	\$ 4,789,406	467,189	9.8%
Special Contracts	\$ 48,960,342	4,775,905	9.8%
Business EV Service	\$ 980,878	88,769	9.0%
Lighting Service	\$ 26,699,426	2,416,298	9.0%
TOTAL	\$ 1,251,877,190	\$ 113,770,651	9.09%

Q. What does Mr. Watkins propose regarding revenue allocation?

A. Mr. Watkins claims that while EKC witness Ms. Miller assigns slightly lower-than-average system increases to the Large Power Service, Special Contracts, and Electric Vehicle classes, his alternative CCOS studies indicate that these classes have significantly deficient RORs and indexed RORs.¹⁶

¹⁵ Reproduced from the Direct Testimony of Lana J. Ellis, p. 9, Table 2.

¹⁶ Direct Testimony of Glenn Watkins, p. 33.

Therefore, Mr. Watkins proposes to apply Ms. Miller's 110% of system average cap to these classes based on his alternative CCOS studies. He further recommends reallocating the resulting additional revenue to reduce the increases for five classes that, according to his alternative CCOS studies, have RORs and indexed RORs significantly above parity and the Company's proposed ROR. These classes include Small General Service, Medium General Service, Interruptible, Large Tire Manufacturing, and Lighting.¹⁷

Mr. Watkins' recommended revenue allocation is summarized in Table JB-2 below.

Table JB-2
CURB Proposed Revenue Allocation¹⁸

	EKC	CURB
Class	Proposed Increase	Proposed Increase
Residential	14.96%	14.96%
RES DG	14.70%	14.70%
SGS	12.64%	12.39%
MGS	11.92%	11.68%
LGS	11.79%	11.79%
LPS	13.05%	14.92%
Educational	14.96%	14.96%
RTOD	14.95%	14.95%
Special Contracts	12.83%	14.92%
Interruptible	11.95%	11.70%
LTM	11.96%	11.71%
EV	12.18%	14.92%
Lighting	11.96%	11.71%
Total	13.56%	13.56%

Q. What does Walmart witness Kavita Maini propose regarding revenue allocation?

¹⁷*Id.*

¹⁸ Reproduced from Direct Testimony of Glenn Watkins, p. 34, Table 11.

1 A. Ms. Maini acknowledges that EKC's recommended revenue allocation is aligned
2 with the CCOS study results directionally, but recommends that larger steps to align
3 with the CCOS results should be taken compared to the movement proposed by the
4 Company to better balance fairness and moderation by moving classes closer to the
5 COSS results.¹⁹

6 Ms. Maini's recommended revenue allocation is summarized in Table JB-3
7 below.

8 **Table JB-3**
9 **Walmart and CCPA Proposed Revenue Allocation²⁰**

Class	EKC Proposed Increase	Walmart and CCPS Proposed Increase
Residential	14.96%	17.00%
RES DG	14.70%	17.00%
SGS	12.64%	11.15%
MGS	11.92%	9.51%
LGS	11.79%	9.51%
LPS	13.05%	12.37%
Educational	14.96%	17.00%
RTOD	14.95%	17.00%
Special Contracts	12.83%	12.37%
Interruptible	11.95%	9.51%
LTM	11.96%	9.51%
EV	12.18%	17.00%
Lighting	11.96%	9.51%
Total	13.56%	13.59%

10
11 **Q. How do you respond to the other intervenor revenue allocation proposals?**

12 A. In general, I support Ms. Maini's and Mr. Watkins recommendations to make
13 additional movement towards aligning revenue allocation with the cost of service.
14 However, I disagree with Mr. Watkins proposed modifications to the revenue

¹⁹ Direct Testimony of Kavita Maini, p. 15.

²⁰ Reproduced from Direct Testimony of Kavita Maini, p. 15, Figure 4.

1 allocation because they are based on his alternative CCOS, which I recommend the
2 Commission reject for the reasons that I have explained above.

3 However, regardless of which cost and revenue allocation *methodologies*
4 the Commission approves in this proceeding, for the reasons I explained in my
5 direct testimony, I continue to recommend that the CCOS study separately allocate
6 costs to each of the special contract customers, and that the individual cost
7 allocation results for the HF Sinclair special contract should be utilized to inform
8 the appropriate revenue allocation to the HF Sinclair special contract.

9 **Q. Does this conclude your direct testimony?**

10 A. Yes, it does.

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

**In the Matter of the Application of
Evergy Kansas Central, Inc. and
Evergy 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**

MGA
STATE OF UTAH Virginia)
Prince William County, VA)
MGA SUMMIT COUNTY)

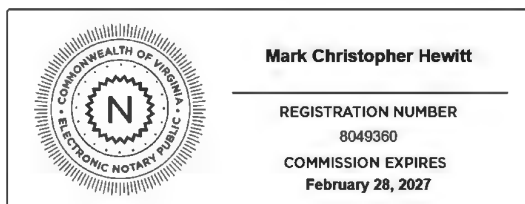
Justin Bieber, being first duly sworn, deposes and states that:

1. He is a Principal with Energy Strategies. L.L.C., in Salt Lake City, Utah;
2. He is the witness who sponsors the accompanying testimony entitled "Cross-Answering Testimony of Justin Bieber;"
3. Said testimony was prepared by him and under his direction and supervision;
4. If inquiries were made as to the facts and schedules in said testimony he would respond as therein set forth; and
5. The aforesaid testimony and schedules are true and correct to the best of his knowledge, information and belief.

Justin Bieber

Justin Bieber

Subscribed and sworn to or affirmed before me this 19th day of June, 2025, by Justin Bieber.



Mark Christopher Hewitt

Notary Public 8049360

My Commission Expires 02/28/2027

Notarized remotely online using communication technology via Proof.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via United States mail, postage prepaid, or electronic mail, this 20th day of June, 2025, addressed to:

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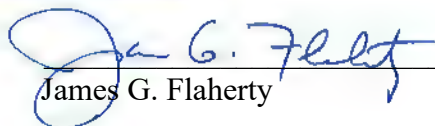
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