

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

Cross Answering Testimony of

Michael P. Gorman

On behalf of

Kansas Industrial Consumers Group, Inc.

March 21, 2025



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STATE OF MISSOURI)
) SS
COUNTY OF ST. LOUIS)

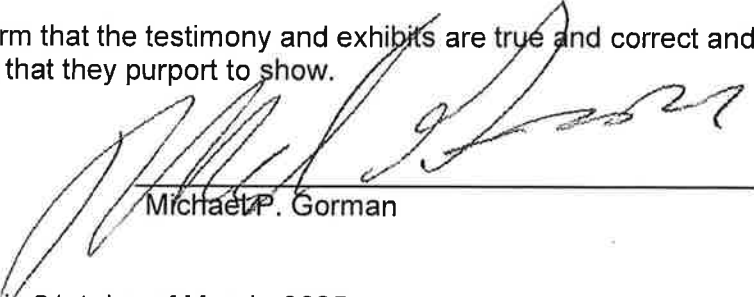
Affidavit of Michael P. Gorman

Michael P. Gorman, being first duly sworn, on his oath states:

1. My name is Michael P. Gorman. I am a Managing Principal with Brubaker & Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by Kansas Industrial Consumers Group, Inc. and its participating members, in this proceeding on their behalf.

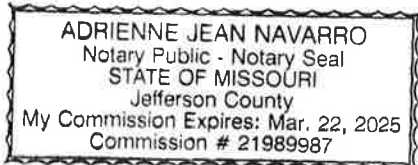
2. Attached hereto and made a part hereof for all purposes is my Cross Answering Testimony which were prepared in written form for introduction into evidence in Kansas State Corporation Commission Docket No. 25-EKCE-207-PRE.

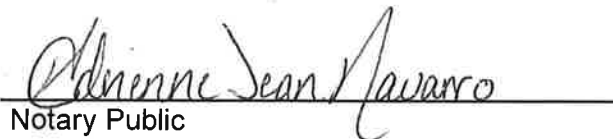
3. I hereby swear and affirm that the testimony and exhibits are true and correct and that they show the matters and things that they purport to show.



Michael P. Gorman

Subscribed and sworn to before me this 21st day of March, 2025.





Notary Public

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Cross Answering Testimony of Michael P. Gorman

1 **I. INTRODUCTION**

2 **Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A Michael P. Gorman. My business address is 16690 Swingley Ridge Road, Suite 140,
4 Chesterfield, Missouri 63017.

5 **Q WHAT IS YOUR OCCUPATION?**

6 A I am a consultant in the field of public utility regulation and a Managing Principal with
7 the firm of Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory
8 consultants.

9 **Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?**

10 A I am appearing in this proceeding on behalf of Kansas Industrial Consumers Group,
11 Inc. ("KIC") and its participating members — Associated Purchasing Services, Cargill,
12 Inc., Goodyear Tire & Rubber Company, Lawrence Paper Company, Occidental
13 Chemical Corporation, and Spirit AeroSystems, Inc. KIC is a group of large industrial

1 customers which purchase substantial amounts of retail electric service from Evergy
2 Kansas Central, Inc. and Evergy Kansas South, Inc. (collectively referred to as “Evergy
3 Kansas Central” or “EKC”). The companies collectively will be referred to as “Evergy”
4 or “Company”.

5 **Q ARE YOU THE SAME MICHAEL P. GORMAN WHO PREVIOUSLY FILED**
6 **TESTIMONY IN THIS PROCEEDING?**

7 A Yes, I am. On March 14, 2025, I filed Direct Testimony on behalf of KIC.

8 **Q WHAT IS THE PURPOSE OF YOUR CROSS ANSWERING TESTIMONY?**

9 A The purpose of my Cross Answering Testimony is to respond to the Direct Testimony
10 of Staff witness Justin Grady.

11 **Q PLEASE SUMMARIZE YOUR TESTIMONY CONCLUSIONS AND FINDINGS.**

12 A I respond to staff witness Justin Grady findings that the Company’s preferred plan is
13 prudent, meets the predetermination standards of being reasonable, reliable, and
14 efficient and should be approved. Mr. Grady’s findings should be disregarded, and the
15 Company’s preferred plan should be rejected along with their request for
16 predetermination for the following reasons:

- 17
- 18 • The Company’s preferred plan does not justify the early retirement of coal units;
19 does not establish a prudent and economic plan on when new confirmed
20 dispatchable resources should be developed and placed in-service and be
21 operated as firm dispatchable resources necessary to support Evergy’s ability
22 to meet the Southwest Power Pool (“SPP”) resource adequacy requirements;
23 and, is not a resilient resource portfolio that considers least cost options to meet
long-term planning requirements.
 - 24 • Failure to meet these objectives is deficient in ensuring that the Company
25 pursues investment in resources portfolios that is necessary to maintain high
26 quality reliable service at affordable rates to Kansas customers. Failing to meet
27 these objectives will prevent the Company from investing in resource portfolios

1 necessary to maintain high-quality, reliable service at affordable rates for
2 Kansas customers.

- 3 • Evergy's preferred plan is not resilient and is not prudent because: 1) it includes
4 open ended projections of uncertain load growth from adding new large load to
5 the resource forecast; 2) has not developed sufficient detail necessary to
6 conclude that firm gas delivery capacity is available, or is expected to become
7 available in the planning period that is needed to operate the new CCGTs as
8 reliable firm dispatchable generation is assumed in the preferred plan; and 3)
9 has established that retiring coal resources early will economically harm
10 customers.
- 11 • Further, the staff's assessment that adding the new CCGT to Evergy's resource
12 portfolio will provide flexibility determining when to retire the coal-fire unit is
13 short sighted and does not contemplate the need for a cautious and thorough
14 review of all production resources and technologies that are available or may
15 become available over the forecast to serve customers at the most economic
16 resource mix available.
- 17 • Evergy's planning studies show that the preferred plan is not the lowest cost
18 resource portfolio. Evergy's planning studies demonstrate that operating coal
19 units through at least 2039 is more economical than replacing coal units with
20 new CCGTs that are expected to operate as firm reliable resources. Again,
21 without clear expectations on whether the CCGTs can be fueled by firm gas
22 delivery supply capacity that is needed to operate the units as firm resources.
23 The preferred resource plan is not reliable or reasonable without better
24 information on projected load and gas delivery infrastructure capacity.

25 For these reasons, I recommend the Commission rejects the staff's
26 recommendations to find the Company's preferred plan prudent, and to also reject
27 staff's report for approving the ratemaking principles requested by Evergy in this
28 proceeding.

29 **Q PLEASE DESCRIBE THE RECOMMENDATIONS AND FINDINGS INCLUDED IN**
30 **MR. GRADY'S TESTIMONY TO WHICH YOU WILL RESPOND.**

31 A Mr. Grady's findings concerning the proposal for determination of ratemaking
32 principles including Evergy's preferred resource plan ("preferred plan") includes the
33 following recommendations.

- 34 a. "K.S.A. 66-1239 contemplates that the analysis of Evergy's
35 investment plan will consider, in part, if Evergy's investment plan is

1 reasonable, reliable, and efficient. Evergy's investment plan,
2 consisting of the 50% ownership of each CCGT and the 100%
3 ownership of the Solar facility, is reasonable, reliable, and efficient,
4 subject to the conditions and compliance filing recommendations
5 discussed in detail later in this testimony. Accordingly, Staff
6 recommends that the Commission find it is prudent for Evergy to
7 acquire these resources, up to the Definitive Cost Estimates ("DCE")
8 of Staff recommends for each asset, as discussed later in this
9 testimony (pages 8-9)."

10 **Q PLEASE DESCRIBE MR. GRADY'S RATIONALE FOR CONCLUDING THE**
11 **COMPANY'S PREFERRED PLAN MEETS KANSAS DETERMINATION FOR**
12 **RATEMAKING PRINCIPLE REQUIREMENTS.**

13 **A** Mr. Grady finds the Company's preferred plan meets the statutes requirement that the
14 preferred plan be "reliable, reasonable and efficient"¹ .

15 Specifically, Mr. Gardy testified the CCGTs are reasonable because:

- 16 ○ "It is reasonable to plan in advance for the eventual retirement of
17 Evergy's coal fleet, even if the specific date that any individual coal
18 unit will retire is uncertain at this time;
- 19 ○ Evergy currently anticipates load growth of 2-3% annually through 2029
20 and has a robust economic development pipeline that would be more
21 than double its current peak demand if it all materialized. SPP too is
22 experiencing rapid load growth and declining reserve margins;
- 23 ○ It will allow Evergy the ability to reliably serve native load and respond
24 to increased load growth in Evergy's service territory, with dispatchable,
25 highly efficient generation;
- 26 ○ It positions Evergy well for a highly uncertain future, even if that future
27 is dominated by intermittent, weather dependent sources of energy such
28 as wind and solar, or more significant restrictions on the production of
29 carbon dioxide as a byproduct of electricity generation;
- 30 ○ It helps Evergy respond to increasingly tighter RA standards being
31 enacted by the SPP;
- 32 ○ It allows EKC to further increase the diversity of its electric generation
33 fuel sources, and

¹ Grady direct at pages 101-104.

- 1 ○ It is responsive to the Energy Policy signals provided by the Kansas
2 Legislature and the Governor, as expressed through the passage of
3 House Bill 2527.”

4 Mr. Grady testified the decision to build the CCGTs is “reliable” because:

- 5 ○ “The CCGT’s will add highly flexible, dispatchable generation to the
6 system, which offers critical reliability services for customers, like the
7 ability to ramp up quickly when needed;
- 8 ○ These CCGTs are being built to withstand winter temperatures as low
9 as -15 Fahrenheit and they will be served by firm natural gas
10 transportation contracts;
- 11 ○ Recent weather events have proven that there have been significant
12 improvements since Winter Storm Uri in the ability of the natural gas and
13 electric industries to maintain reliability during extreme winter weather
14 events; and
- 15 ○ The CCGTs are expected to have very low forced outage rates.”

16 Finally, Mr. Grady testified that The decision to build the CCGTs is “efficient”
17 because:

- 18 ○ “These CCGTs are highly fuel efficient, approximately 40% more
19 efficient than the average natural gas unit in Evergy’s fleet in terms of
20 the ability to generate one MWh of electricity per MMBtu;
- 21 ○ The CCGT’s were selected as part of the updated 2024 IRP analysis
22 that Evergy conducted in support of this Application which selects the
23 least cost portfolio of resources, given a certain set of constraints,
24 assumptions, and scenarios;
- 25 ○ The competitive process that Evergy has utilized to construct and select
26 these projects will ensure that they are efficiently priced. Additionally,
27 Evergy plans to economically commit the CCGTs in the SPP IM;
- 28 ○ Staff evaluated the efficiency of the Viola and McNew CCGTs using the
29 S&P Global Power Evaluator software platform. For Viola the result was
30 an anticipated 77.19% capacity factor in year 1, and an estimated LCOE
31 of \$68/MWh. For McNew the result was an anticipated 72.61% capacity
32 factor in the first year, with a LCOE estimated at \$74/MWh;
- 33 ○ The estimated LCOE figures calculated 1 by the Power Evaluator
34 software compare favorably to the average LCOE of \$76/MW reported
35 for a new CCGT by the Lazard 2024 LCOE report, which also provided
36 a range of LCOEs for new CCGTs, estimated to be \$45 to \$108/MWh;
37 and

1 o The CCGTs will be very efficient from a carbon dioxide emissions
2 perspective, allowing a 61% reduction from the average coal-fired
3 generation unit in EKC's fleet today and a 53% reduction from the
4 average natural gas CT in EKC's fleet today."
5

6 **Q WHAT ARE THE CONDITIONS STAFF PROPOSES THAT CONDITION ITS**
7 **RECOMMENDED FINDING TO ACCEPT THE PREFERRED PORTFOLIO?**

8 A. Mr. Grady outlines several conditions under his recommendations at pages 107-109 of
9 his direct testimony. Two of his recommended conditions include:

10 1) "The Commission should approve Evergy's decision to acquire 50%
11 of the Viola CCGT, 50% of the McNew CCGT, and the Kansas Sky
12 Solar facility as reasonable, reliable, efficient, and consistent with
13 Evergy's most recent preferred plan and resource acquisition
14 strategy."

15 2) "Evergy should file a compliance filing with the KCC once all natural
16 gas transportation arrangements have been finalized. This filing
17 should include, at a minimum, the financial terms and conditions
18 under which firm natural gas transportation has been secured and
19 the length of the transportation arrangement."

20 **Q IS MR. GRADY'S RECOMMENDATION THAT EVERGY'S PREFERRED PLAN IS**
21 **REASONABLE, RELIABLE AND EFFICIENT BASED ON VERIFIABLE EVIDENCE?**

22 A No. Many material factors included in the Company's preferred plan are based on
23 projections that are not known nor reasonably measured. This includes: 1) the
24 expected additions of large new customer loads; and 2) the extent that new CCGTs
25 can be relied on to meet Evergy's SPP resource adequacy obligations and the timing
26 of new CCGTs after removing uneconomic assumptions related to the early retirement
27 of Evergy's coal generating resources.

28 Specifically, at page 9 of Mr. Grady's testimony, he states that Evergy's 2024
29 IRP which supports near term need for the CCGT resource is reasonable in part for
30 various reasons including: 1) Evergy's anticipated load growth through 2029; 2)
31 Evergy's experiencing rapid deterioration in its reserve margins; and 3) CCGTs will

1 allow Evergy the ability to reliably serve native load using dispatchable highly efficient
2 generation that will help Evergy in an increasingly tighter resource adequacy (“RA”)
3 standard enacted by the Southwest Power Pool.

4 Mr. Grady notes SPP RA requirements for planning reserve margins based on
5 the implementation of a performance based accreditation (“PBA”) which takes into
6 consideration of fuel assurance of conventional generators. For reasons outlined in my
7 direct testimony, and expanded below, these very parameters are why the Company’s
8 preferred plan is not reliable, reasonable, or efficient.

9 Specifically, the Company’s projected load growth is not based on growth to
10 base customers but is highly impacted by the expected additions of very large new
11 customers. Adding these new customers to the system is uncertain, and the need for
12 additional resources is based on projections of load forecasts that include the new large
13 customer loads. Further, the preferred plan relies on new CCGTs to meet Evergy’s
14 SPP resource adequacy requirement. However the CCGTs must have firm gas
15 delivery supply in order to receive accredited capacity status that can support Evergy’s
16 ability to comply with this resource adequacy requirement. Evergy is currently
17 investigating the availability of firm gas delivery infrastructure needed to operate the
18 CCGTs as firm dispatchable generating units. The Company’s preferred portfolio is
19 not reliable, because it’s not clear when or if this firm pipeline gas delivery capacity will
20 be available to deliver gas to the new CCGTs, and thus if these resources can be
21 operated as a reliable firm resource that can be called upon to serve Evergy’s loads in
22 all hours of the year. Indeed, gas curtailments can significantly increase the number
23 of unplanned outages of the CCGTs and can have a significant impact on these
24 resource’s availabilities to support Evergy’s system resource adequacy requirements
25 and to meet SPP RA requirements.

1 **Q PLEASE SUMMARIZE THE ADDITIONAL INFORMATION THAT OUTLINES THE**
2 **UNCERTAINTY ABOUT PROJECTED LOAD ADDITIONS OF LARGE CUSTOMER**
3 **RESOURCES IN EVERGY’S PREFERRED PORTFOLIO.**

4 A In response to Highly Confidential response to NRDC-27, Evergy characterized its
5 including of expected large new customers additions to its forecast as:

6 “Please refer to the response to CURB-4(c) which states, "Only projects
7 that have committed to locating in Evergy's service area would have been
8 accounted for in the IRP.

9 a. What action by new customers would indicate a commitment to
10 "locating in Evergy's service area?"

11 b. Please provide any service agreement, memorandum of
12 understanding, or other document signed by this new customer and
13 Evergy. The customer's name and other identifying information can
14 be redacted.

15 In order to consider specific projects/customers into base integrated
16 resource planning, Evergy typically has some form of commitment from a
17 customer. Generally, this is in the form of a service agreement or
18 engineering agreement. Past IRPs have included economic development
19 demand buffers that are informed by the size of load that we have
20 confidence in but have yet to materialize into a specific customer
21 commitment.

22 a) Please see the attached documentation of a Letter Agreement and
23 executed Service Agreement with Panasonic.”

24 Evergy has not shown that including large new customers load in its forecast
25 based on these parameters is reasonable.

26 **Q PLEASE DESCRIBE SPP’S EVALUATION OF THE ACCREDITED CAPACITY OF**
27 **VARIOUS THERMAL RESOURCES BASED ON FIRM FUEL DELIVERY.**

28 A Evergy’s 2024 IRP notes the need for accredited capacity to meet higher load and
29 stringent reserve margin requirements: “The overall combined cycle additions by the
30 early 2030’s are higher in the 2024 portfolio, mainly reflecting each of Evergy’s utilities

1 needing more accredited capacity due to higher load growth and more stringent reserve
2 margin requirements.”²

3 In meeting its planning reserve margin requirements, SPP notes its assessment
4 of fuel delivery reliability in measuring a CCGT accredited capacity, it states:

5 “PLANNING RESERVE MARGIN

6 The Base Planning Reserve Margin (“Base PRM”) shall be fifteen percent
7 (15%). The capacity used from resources when determining the Base PRM shall be
8 the accredited capacity of wind, solar, and energy storage resources, excluding
9 pumped storage hydroelectric resources, and the demonstrated net generating
10 capability of all remaining conventional resources. Determination of the Base PRM will
11 be supported by a probabilistic Loss of Load Expectation (“LOLE”) study, which will
12 analyze the ability of the transmission provider to reliably serve the SPP Balancing
13 Authority Area’s forecasted peak demand.

14 Effective June 1, 2026, the Base PRM will be used as a basis for calculating an
15 Accredited Capacity PRM by applying the Accredited Capacity in accordance with
16 Attachment AA of the Tariff. The difference of the conventional resources’
17 demonstrated net generating capability and the Accredited Capacity will be used to
18 calculate the Accredited Capacity PRM. Both the Base PRM and Accredited Capacity
19 PRM include the Accredited Capacity for run-of-the-river hydroelectric resources, wind
20 resources, solar resources, and electric storage resources, excluding pump storage
21 hydroelectric resources. The example below is given for illustration purposes. Effective
22 June 1, 2026, the calculated Accredited Capacity PRM shall be applied to all Load
23 Responsible Entities, regardless of resource mix.”

24 SPP defined Net Generating Capability as: “the gross maximum output a unit
25 can sustain over a one-hour period reduced by any power used for unit auxiliaries,
26 modified for environmental, seasonal, operational and fuel limitations.”³

27 SPP also outline the capability test of resources in meeting resource accredited
28 adequacy. For thermal units SPP states:

29 “ACCREDITATION FOR THERMAL AND HYDRO UNITS

30 Assurance of having desired generating capacity depends, in part, on the
31 availability of an adequate and reliable fuel supply. Where contractual or physical
32 arrangements permit curtailment or interruption of the normal fuel supply, sufficient
33 quantities of standby fuel shall be provided. Due to the dependence of hydroelectric

² Evergy Kansas Central and Evergy Metro 2024 Integrated Resource Plan Volume 1 Executive Summary May 2024, at pdf page 16.

³ *Id.* at page 41.

1 plants on seasonal water flows, this factor shall be taken into consideration when
2 calculating the Accredited Capacity.”⁴

3 **Q DOES STAFF’S CONDITIONAL RECOMMENDED APPROVAL ALLEVIATE THE**
4 **DEFICIENCIES IN THE COMPANY’S PREFERRED PORTFOLIO?**

5 A No. It is important to recognize that staff recognizes the need for firm gas supply in
6 order to operate the CCGTs as firm dispatchable units as contemplated in the
7 Company’s preferred portfolio. As part of its conditions and compliance filings, staff
8 requires the Company to agree to keep the Commission, staff and numerous counsel
9 updated on its effort to secure firm gas supply to operate these generating units. Staff
10 also recommends the Company keep these same parties updated concerning its
11 decision on when to retire its coal-fired generating units. Staff’s conditional support
12 assumes that the Company will be able arrange firm gas supply for the new CCGTs.
13 This factor is uncertain at this point. Further, staff has not weighed in on whether the
14 Company’s preferred plan assumption that retiring coal-fired generating units early is
15 reasonable and will not harm customers. This also is an important feature of the
16 preferred plan that has not been proven to be reasonable and accounted for by Staff
17 or the company.

18 **Q DOES THIS CONCLUDE YOUR CROSS ANSWERING TESTIMONY?**

19 A Yes, it does.

⁴ SPP Planning Criteria Revision 4.1, published on May 12, 2023

1 **Qualifications of Michael P. Gorman**

2 **Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A Michael P. Gorman. My business address is 16690 Swingley Ridge Road, Suite 140,
4 Chesterfield, MO 63017.

5 **Q PLEASE STATE YOUR OCCUPATION.**

6 A I am a consultant in the field of public utility regulation and a Managing Principal with
7 the firm of Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory
8 consultants.

9 **Q PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND WORK**
10 **EXPERIENCE.**

11 A In 1983 I received a Bachelor of Science Degree in Electrical Engineering from
12 Southern Illinois University, and in 1986, I received a Master's Degree in Business
13 Administration with a concentration in Finance from the University of Illinois at
14 Springfield. I have also completed several graduate level economics courses.

15 In August of 1983, I accepted an analyst position with the Illinois Commerce
16 Commission ("ICC"). In this position, I performed a variety of analyses for both formal
17 and informal investigations before the ICC, including: marginal cost of energy, central
18 dispatch, avoided cost of energy, annual system production costs, and working capital.
19 In October of 1986, I was promoted to the position of Senior Analyst. In this position, I
20 assumed the additional responsibilities of technical leader on projects, and my areas
21 of responsibility were expanded to include utility financial modeling and financial
22 analyses.

1 In 1987, I was promoted to Director of the Financial Analysis Department. In
2 this position, I was responsible for all financial analyses conducted by the Staff. Among
3 other things, I conducted analyses and sponsored testimony before the ICC on rate of
4 return, financial integrity, financial modeling and related issues. I also supervised the
5 development of all Staff analyses and testimony on these same issues. In addition, I
6 supervised the Staff's review and recommendations to the Commission concerning
7 utility plans to issue debt and equity securities.

8 In August of 1989, I accepted a position with Merrill-Lynch as a financial
9 consultant. After receiving all required securities licenses, I worked with individual
10 investors and small businesses in evaluating and selecting investments suitable to their
11 requirements.

12 In September of 1990, I accepted a position with Drazen-Brubaker &
13 Associates, Inc. ("DBA"). In April 1995, the firm of Brubaker & Associates, Inc. was
14 formed. It includes most of the former DBA principals and Staff. Since 1990, I have
15 performed various analyses and sponsored testimony on cost of capital, cost/benefits
16 of utility mergers and acquisitions, utility reorganizations, level of operating expenses
17 and rate base, cost of service studies, and analyses relating to industrial jobs and
18 economic development. I also participated in a study used to revise the financial policy
19 for the municipal utility in Kansas City, Kansas.

20 At BAI, I also have extensive experience working with large energy users to
21 distribute and critically evaluate responses to requests for proposals ("RFPs") for
22 electric, steam, and gas energy supply from competitive energy suppliers. These
23 analyses include the evaluation of gas supply and delivery charges, cogeneration
24 and/or combined cycle unit feasibility studies, and the evaluation of third-party
25 asset/supply management agreements. I have participated in rate cases on rate

1 design and class cost of service for electric, natural gas, water and wastewater utilities.
2 I have also analyzed commodity pricing indices and forward pricing methods for third
3 party supply agreements, and have also conducted regional electric market price
4 forecasts.

5 In addition to our main office in St. Louis, the firm also has branch offices in
6 Corpus Christi, Texas; Detroit, Michigan; Louisville, Kentucky and Phoenix, Arizona.

7 **Q HAVE YOU EVER TESTIFIED BEFORE A REGULATORY BODY?**

8 A Yes. I have sponsored testimony on cost of capital, revenue requirements, cost of
9 service and other issues before the Federal Energy Regulatory Commission and
10 numerous state regulatory commissions including: Alaska, Arkansas, Arizona,
11 California, Colorado, Delaware, the District of Columbia, Florida, Georgia, Idaho,
12 Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Massachusetts,
13 Michigan, Minnesota, Mississippi, Missouri, Montana, Nevada, New Hampshire, New
14 Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma,
15 Oregon, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia,
16 Washington, West Virginia, Wisconsin, Wyoming, and before the provincial regulatory
17 boards in Alberta, Nova Scotia, and Quebec, Canada. I have also sponsored testimony
18 before the Board of Public Utilities in Kansas City, Kansas; presented rate setting
19 position reports to the regulatory board of the municipal utility in Austin, Texas, and Salt
20 River Project, Arizona, on behalf of industrial customers; and negotiated rate disputes
21 for industrial customers of the Municipal Electric Authority of Georgia in the LaGrange,
22 Georgia district.

1 Q PLEASE DESCRIBE ANY PROFESSIONAL REGISTRATIONS OR
2 ORGANIZATIONS TO WHICH YOU BELONG.

3 A I earned the designation of Chartered Financial Analyst (“CFA”) from the CFA Institute.
4 The CFA charter was awarded after successfully completing three examinations which
5 covered the subject areas of financial accounting, economics, fixed income and equity
6 valuation and professional and ethical conduct. I am a member of the CFA Institute’s
7 Financial Analyst Society.

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March 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:

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