BEFORE THE KANSAS CORPORATION COMMISSION

OF THE STATE OF KANSAS

In the Matter of the Petition of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Determination of the Ratemaking Principles and Treatment that Will Apply to the Recovery in Rates of the Cost to be Incurred for Certain Electric Generation Facilities Under K.S.A. 66-1239.	)	Docket No. 25-EKCE-207-PRE

RENEW MISSOURI ADVOCATE'S POST HEARING BRIEF IN OPPOSITION TO THE NON-UNANIMOUS PARTIAL SETTLEMENT AGREEMENT REGARDING THE CONSTRUCTION OF NATURAL GAS GENERATION FACILITIES

1. <u>Introduction</u>

Renew Missouri Advocates ("Renew Missouri") opposes Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. ("Evergy" or the Company")'s request for the approval of ratemaking principles for two new natural gas-powered electric generation facilities.[1] Renew Missouri is very concerned that Evergy's request to build two combined cycle gas turbine ("CCGT") when only one is needed will result in excess and unnecessary costs to Kansas ratepayers and will ultimately result in Evergy implementing a large, carbon-based generation facility into its long-term portfolio.[2] Renew Missouri urges the Kansas Corporation Commission ("Commission") to deny Evergy's request for predetermination related to the Viola and McNew CCGT facilities, because constructing two CCGTs inherently comes with additional costs that are not in the public interest, and, as Evergy admits, are otherwise unnecessary given that Evergy

[1] See Petition for Determination of Ratemaking Principles and Treatment, Docket No. 25-EKCE-207- PRE, p. 3, ¶ 6 (hereinafter "Application").
[2]

Kansas Central's ("EKC") gas capacity needs identified by the 2024 IRP can be met by constructing a single CCGT.

Finally, Renew Missouri supports Evergy's inclusion of the Kansas Sky facility in this predetermination docket and recommends that the Commission approve Evergy's predetermination filing related to this solar facility.

2. <u>Procedural History</u>

On November 6, 2024, Evergy filed its Petition for the Determination of Ratemaking Principles and Treatment pursuant to K.S.A. 66-1239.6 In its Petition, Evergy requested predetermination for projects it has denominated as: (a) the "Viola Plant" — a 710 MW natural gas generation facility; (b) the "McNew Plant" — a 710 MW natural gas generation plant (often jointly referred to in this document as the "natural gas projects"); and (c) the "Kansas Sky"— a 200 MW solar generation facility.[3] Evergy stated in its Petition and later in Supplemental Testimony proffered by Darrin R. Ives, that Evergy Central will acquire a 50 percent stake in the McNew Plant, as well as a 50 percent stake in the Viola Plant, with the remaining 50 percent interest in each plant to be acquired or allocated to Evergy Missouri West, Inc.[4] Many intervenors filed written direct, rebuttal, and cross-answering testimony.

On April 9 through April 11, 2025, the parties met for a Settlement Conference. Ultimately, the parties unanimously settled their issues with respect to the construction and predetermination of the Kansas Sky solar generation facility.[5] However, the parties did not reach unanimous

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[3] See Petition of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Determination of Ratemaking Principles and Treatment, KCC Docket No. 25-EKCE-207-PRE (Nov. 6, 2024) (hereinafter "Petition").

[4] See id.; see also Supplemental Direct Testimony of Darrin R. Ives, KCC Docket NO. 25-EKCE-207-PRE, pp. 2-3 (February 14, 2025).

[5] See Joint Motion for Approval of Unanimous Partial Settlement Agreement Regarding Solar Facility, KCC Docket NO 25-EKCE-207-PRE (Apr. 16. 2025). To be clear, the Wichita Regional Chamber joined in that Motion.

agreement with respect to the construction of the Viola and McNew gas plants. As a result, some of the parties entered into a non-unanimous partial settlement of the request for predetermination related to the Viola and McNew plants. The only parties that joined the non-unanimous partial settlement for the construction of the Viola and McNew plants were: Evergy; the Commission Staff; KPP Energy; Natural Resources Defense; Midwest Energy, Inc.; the Board of County Commissioners of Johnson County, Kansas; City of Lawrence, Kansas; Atmos Energy Corporation; HF Sinclair El Dorado Refining LLC; Kansas Municipal Energy Agency; and Kansas Gas Service, a division of ONE Gas, Inc. The remaining parties, over 20 intervenors mostly representing the residential customers and other retail entities in the Evergy Central service area that will ultimately bear the economic burden of paying for these extraordinarily expensive natural gas facilities, either opposed or opted out of the non-unanimous partial settlement. Because the parties could not reach a unanimous settlement on the question of whether and when the natural gas facilities should be built, the Commission held an evidentiary hearing from April 21 through April 23, 2025.

3. <u>Legal Standard</u>

Under K.S.A. § 66-1239 (the "Predetermination Statute"), a utility seeking predetermination of ratemaking principles for a proposed resource must demonstrate that its proposal aligns with the utility's most recent IRP.[6] In tying predetermination requests to the IRP process, the Predetermination Statute reflects legislative intent to ensure that major resource decisions are grounded in comprehensive and forward-looking planning. To this end, the Predetermination Statute authorizes the Commission to evaluate whether the utility's proposed plan is reasonable, reliable, and efficient.[7]

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[6] KAN. STAT. ANN. § 66-1239(c)(2).
[7] KAN. STAT. ANN. § 66-1239(c)(3)

To approve a non-unanimous settlement agreement, the Commission must make an independent finding, supported by substantial evidence in the record as a whole, that the settlement will establish just and reasonable rates. In evaluating non-unanimous settlement agreements, the Commission generally considers the following five factors:[8]

> 1) There was an opportunity for the parties in opposition to the settlement agreement to be heard on their reasons for opposing the agreement;
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> 2) The agreement is supported by substantial competent evidence;
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> 3) The agreement conforms with applicable law;
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> 4) The agreement results in just and reasonable rates; and
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> 5) The results are in the public interest, including the interest of the customers represented by the party not consenting to the agreement.[9]

In the instant proceeding, the Non-Unanimous Settlement proposes the approval of the substantive portions of Evergy's Application with regard to construction and ownership of the Viola and McNew generating facilities.[10] As a result, if Evergy's underlying Application is not fully justified or consistent with the Predetermination Statute, then the related settlement agreement cannot meet settlement factors two through five listed above. As discussed herein, Evergy has failed to demonstrate that the exact plan it has proposed is the most reasonable and efficient option as compared to realistic alternatives. Accordingly, the Commission should not approve the Non-Unanimous Settlement as submitted.

4. <u>Evergy's Application seeking Predetermination of the Viola and McNew CCGT Facilities should be denied because it is not in the public interest to build two CCGTs.</u>

The purpose of this predetermination docket is to accommodate a total of 650 MW of projected thermal adds (325 MW in 2029 and 325 MW in 2030) for the Evergy territory as identified by the

[8] KCC Docket No. 08-ATMG-280-RTS, Order Approving Contested Settlement Agreement, ¶ 11 (May 12, 2008).
[9] *Id*.
[10] See KCC Docket No. 25-EKCE-207-PRE, Joint Motion for Approval of Non-Unanimous Partial Settlement Agreement Regarding Natural Gas Facilities, Attachment 1 (Apr. 16, 2025).

Company's 2024 IRP.[11] EKC has elected to seek predetermination of two CCGTs, the Viola and McNew plants. Evergy is only seeking a 50% stake in the Viola Facility and a 50% stake in the McNew facility.[12] So, despite constructing two CCGTs with a total combined generating capacity of 1,420 MW, EKC will only have a stake in half of the generating power constructed (i.e., 710 MW) While this ownership split decision will give EKC access to 710 MW of generating capacity necessary to accommodate the 650 MW of projected thermal identified by the 2024 IRP, this ownership methodology is unnecessary and is not in the public interest. Indeed, deciding to take two separate 50% ownership interests in two separate 710 MW facilities, as opposed to one 100% ownership interest in one 710 MW facility (similar to the ownership methodology implemented for the Kansas Sky facility), is unnecessary. And while there is no difference in outcome with regard to EKC's ability to accommodate the 650 MW of projected thermal capacity for EKC in 2029 and 2030, Evergy's ownership methodology (i.e., whether it needs to build one or two CCGTs) does make a vast difference in terms of construction and environmental costs. This rationale ignores the inherent reality that it costs more to build two things than it does to build just one. And while the CWIP will only allow Evergy to pass costs down to ratepayers up to Evergy's stake in the facilities, many intervenors contest the prudent nature of Evergy's definitive cost estimates for each facility, particularly as it relates to the volatile cost of gas. Committing to increased, inflated, and ultimately unnecessary volatile costs are not in the public's interest. Evergy's unnecessary decision to construct two CCGTs as opposed to one will also increase the environmental costs incurred by the public. Because the environmental costs could be cut in half by only constructing one CCGT, not two, Evergy's application has the potential to unnecessarily double the inherent environmental costs associated with gas-power generation facilities. This is

[11] See Direct Testimony of Cody VandeVelde (Public), Docket No. 25-EKCE-207-PRE, p. 16 (Nov. 6, 2024).
[12] Application, p. 3, ¶ 6.

not in the public's interest. Evergy's 2024 IRP identified only 650 MW of future gas capacity needs. Yet, Evergy's Application seeks to construct two new gas facilities that can produce a combined 1,420 MW of gas capacity. This is not only overkill, but it ignores the long-term greenhouse gas impact that constructing and operating an otherwise unnecessary 710 MW of CCGT will have on the region. Ultimately, constructing two separate CCGTs will undoubtedly result in the long-term implementation of an otherwise unnecessary 710 MW gas-power facility, a generation type that will produce greenhouse gas for years to come, and, as and explained later in more detail, will be reliant on a volatile fuel source—gas. Because Evergy's ownership methodology for the Viola and McNew facilities is not in the public's interest based on the unreasonable construction and environmental costs that come along, and because it is not necessary for Evergy to split its ownership stake in the manner that it did to accommodate Evergy's needs, the Commission should deny Evergy's Predetermination Application for these CCGTs.

5. Natural Gas Volatility

Evergy does not capture in its bill impacts the volatility of natural gas. The fuel requirements associated with natural gas plants are a significant factor in the long-term costs associated with these resources and how they should reasonably be evaluated in selecting a resource plan. Indeed, fuel and related costs are generally the largest operational costs for baseload power plants, making them consequential in determining the ultimate cost of the energy produced.[13] Evaluating the sufficiency of the natural gas price forecasting, Evergy's plan for risk mitigation, and the overall projected impact of fuel costs on retail rates is therefore imperative in determining the reasonableness and efficiency of Evergy's preferred plan against alternative portfolios with

[13] KCC Docket No. 25-EKCE-207-PRE, Direct Testimony of William "Nick" Jones on Behalf of the Council for the New Energy Economics, p. 8:17-19 (Mar. 14, 2025).

varying fuel requirements.[14] Evergy's natural gas price forecasting suffers from significant methodological deficiencies, and Evergy has failed to put forward detailed evidence as to its proposed fuel supply plan or the ultimate impact projected fuel costs will have on customer rates. This means that there is detailed evidence in the record indicating that Evergy is underestimating the risks associated with natural gas prices.

The analysis set forth in Evergy's Application is based on the mid-case natural gas fuel price forecast presented in its 2024 integrated resource plan (IRP),[15] which contains several methodological deficiencies described in more depth below. Inadequate or flawed fuel price forecasting poses several material risks relevant to the Commission's consideration. First, incorrect forecasting could lead to an understating of the net-present-value revenue requirement ("NPVRR") impact of new natural gas plants and therefore an over-selection of natural gas plants in preferred portfolios.[16] Second, inadequate forecasting would misstate the fuel costs associated with a given plan, thus hindering the Commission's ability to accurately evaluate it.[17] Finally, an inaccurate forecast can undercut the utility's efforts to measure and manage risk.[18] Evergy's historical realized natural gas costs provide an important data point by which the Commission should evaluate the reasonableness of the fuel price forecasting underlying the plants. A comparison of Evergy's previous forecasts to actual historical prices and its actual historical costs indicates Evergy's forecasting suffers from a tendency to materially underestimate fuel prices.[19] Evergy utilized the same methodology to develop its mid-case natural gas price forecast between 2021 and 2024

[14] Id. at 4:12-14.
[15] Id. at 6:17.
[16] Id. at 8:14-17.
[17] Id. at 4:14-15.
[18] Id. at 4:16-17.
[19] Id. at 6:21-22, 7:1.

Triennial IRPs.[20] As a result, proven deficiencies in Evergy's 2021- 2024 are likely to be present in the forecasting underlying the Application. In fact, public data shows that from 2021 to 2024, Henry Hub prices averaged approximately 40% above Evergy's annualized mid-case scenario.[21]] Delivered costs per MMBtu averaged approximately 90% above Evergy's annualized mid-case, during the same time.[22] Ultimately, the Company's natural gas supply during these years cost approximately $168 million more than the value of the fuel forecast in its 2021 IRP.[23] Evergy's bias towards underestimating fuel prices can be attributed to two primary flaws in its forecasting process. First, Evergy bases its forecasting on the Henry Hub national price benchmark, which fails to account for specific regional market dynamics that can inflate the price of delivered fuel.[24] Second, the Company forecasts prices on a monthly cadence, which discounts the potential for short-term fluctuations that raise costs during periods of peak demand.[25] To properly forecast at a local level, Evergy would need to account for events in which local prices disconnect from national markets, for example outlying events that have occurred periodically during winter months in Kansas.[26] While transportation costs account for some of the discrepancy between Evergy's historical fuel costs and its forecasts, these costs can only explain a minority share.[27] The full gap between these values is due to either 1) Evergy paying a local commodity price higher than the Henry Hub price or 2) monthly costs that have been inflated by the need to purchase more gas during periods of high prices.[28] A review of Evergy's historical fuel costs at Hawthorn, even when

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[20] Id. at 7:4-9.
[21] Id. at 7:12-13.
[22] Id. at 7:13-14.
[23] Id. at 7:14-16.
[24] Id. at 6:1-3.
[25] Id. at 6:8-10.
[26] KCC Docket No. 25-EKCE-207-PRE, Cross-Answering Testimony of William "Nick" Jones on Behalf of the Council for the New Energy Economics, p. 3:13-17 (Mar. 21, 2025).
[27] Id. at 5:10-11.
[28] Id. at 5:11-14.

adjustments are made for transportation, confirms the Company's fuel supply during peak demand periods is subject to local dynamics that depart from a normal basis spread.[29] This presents a material risk associated with the Company's proposed plan – that is, that the cost of fuel associated with the Viola and McNew plants will cost ratepayers more than Evergy has represented in its Application. As fuel costs will make up most of the ongoing costs associated with these plants, the likelihood that costs will be greater than those upon which Evergy states in its Application should be a material consideration in the Commission's evaluation of whether the proposed plan is reasonable and efficient.

Beyond methodological deficiencies, some additional factors indicate that Evergy's natural gas price forecast is outdated when considering current market developments and therefore understates future prices. This conclusion is reinforced by the recent Energy Information Administration ("EIA") 2025 Annual Energy Outlook ("AEO"), as well as a recent Kansas City Federal Reserve Bank survey of energy production executives. Increased demand for natural gas generation is slated to inflate prices and create longer lead times for CCGT equipment, and which is likely to have an equivalent upward impact on fuel prices.[30] Further, recent national regulatory changes have encouraged greater development of Liquified Natural Gas ("LNG") export facilities while slowing the development of other resources such as wind power.[31] The United States (US)' growth in capacity for exports through new LNG terminals means that international markets are increasingly drawing supply from the US, exposing domestic gas buyers to higher prices.[32] The impact of high-margin LNG exporters will lead to more common short-term price spikes.[33] Finally,

[29] Id. at 6:5-21, 7:1-2, Figure 1.
[30] Jones Direct at 10:1-4.
[31] Id. at 10:5-9.
[32] Id. at 13:8-12.
[33] Id. at 18:1-8.

the Kansas City Federal Reserve Bank recently published a survey of executives at leading energy producers in the Mid-Continent region, which include states expected to supply gas to the Viola and McNew plants.[34] Importantly, that survey reflected the conclusion that for these energy producers to profitably and sustainably expand production to meet the increasing demand, gas prices would need to surpass $5.[35] With these data points in mind, it is reasonable to conclude that the methodological flaws in Evergy's forecasting and the outdated nature of its 2024 IRP forecast have led Evergy to understate the fuel costs projected to impact the Viola and McNew plants and the potential market risk to which these costs will be exposed.

Despite the importance of the fuel supply plan to determining whether its plan is reasonable and efficient, Evergy has not put forward a definitive fuel supply plan in this case.[36] The only metric by which the Commission can assess whether Evergy will adequately manage risk is by considering the vague and unfinalized description Evergy has provided and the practices it has recently employed at similar facilities.[37] In testimony, Evergy indicated that it plans to purchase natural gas in a similar manner to how it currently purchases coal.[38] The Commission should regard this stated intention as insufficient to demonstrate that Evergy will protect customers against short-term volatility and the potential for long-term increases in fuel costs.[39] This is because natural gas prices are definitively more volatile than coal, and therefore a reasonable supply plan for natural gas requires more robust risk management strategies.[40]. As with evaluating the sufficiency of Evergy's fuel price forecasting, actual historical data is informative in understanding whether how

[34] Tr. Vol. 3 at 645:24-25, 646:1-4;
[35]Tr. Vol. 3 at 647:7-17; Hearing Exhibit NEE-03 at 3.
[36] Id. at 23:17-20.
[37] Id. at 23:20-21, 24:1.
[38] Id. at 12:17-19.
[39] Id. at 12:14-19.
[40] Id. at 13:13-16.

well Evergy has handled risk in the past. Evergy's historical natural gas procurement at the comparable Hawthorn plant demonstrate that it has not mitigated risk properly.[41] From 2022 to 2024, Evergy's average delivered cost of natural gas at Hawthorn was approximately 40% above its mid-case forecast and 15% above its high-case price forecasts for that time.[42] During short-term price spikes caused by winter storms in December of 2022 and January of 2024, fuel costs at Hawthorn averaged $11.13 per MMBtu and $10 per MMBtu, respectively.[43] Further, historical data indicates that the average unit cost of Evergy's fleet-wide spot purchases from 2021-2024 was approximately double the average annual prices forecasted for the same timeframe under Evergy's mid-case scenario in their 2021 IRP.[44] Ultimately, Evergy's failure to put forward specific details as to its anticipated fuel supply plan prevent the Commission from conclusively determining that Evergy will mitigate the risks of gas price volatility described above. Whether these risks can be kept at a reasonable level is key to the Commission's determination as to the reasonableness and efficiency of Evergy's plan, meaning that Evergy has failed to demonstrate a crucial element of its Application.

5. <u>Evergy's Resource Modeling Understates the Benefits of Battery Storage.</u>

In evaluating Evergy's 2024 IRP analysis, it is clear that Evergy's specific modeling practices biased the resulting resource models toward understating the benefits of battery storage resources.[45] This is material in determining whether Evergy's Application is reasonable and efficient, as battery storage is one clear alternative to natural gas resources that could help meet capacity need during peak demand periods without increasing ratepayer exposure to risk in the

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[41] Id. at 15:9-10.
[42] Id. at 15:18-20, 16:1-2.
[43] Id. at 17:2-5, Figure 1.
[44] Id. at 19:15-19.
[45] Jones Direct at 33:13-15.

natural gas market.[46] There are two key factors that prevented Evergy from fully capturing the value of storage in its modeling analysis. First, Evergy only modeled scenarios in which it was allocated a 50% or 100% share of McNew and did not model a lower percentage of ownership based on its specific capacity need.[47] In doing so, Evergy constrained the ability of its resource model to select more flexible plans including smaller incremental battery resources that could be built concurrently with the proposed natural gas plants to maximize efficiencies. It is important to note that Evergy's decision to limit its modeling to 50% or 100% ownership blocks was its own arbitrary decision. Indeed, Evergy admits that ownership shares in power plants are not limited to 50% or 100% shares.[48] Lower ownership shares are not uncommon, as illustrated by the Missouri Public Service Commission's approval of Evergy's request to acquire a 22.2% share in the Dogwood CCGT plant just last year.[49] Finally, there is no practical constraint within Evergy's resource model software that would prevent Evergy from inputting any specific ownership share.[50] Second, Evergy failed to model battery storage in a way that fully accounts for the efficiencies associated with the specific resource type. In particular, Evergy did not model storage paired with other new resources, or siting storage at sites with existing interconnection rights.[51] This is critical, as market data clearly indicates that there are significant cost efficiencies to co-siting storage with complementary resources, and some of these cost efficiencies include the opportunity to reduce or eliminate interconnection costs.[52] By failing to optimize its model to fully account for the value of battery storage, Evergy biased its resource model towards selection of natural gas generation. This underlying bias casts doubt as to whether Evergy's proposed plan would be selected as the most

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[46]Id. at 31:1-3.
[47] Tr. Vol. 2 at 371:18-25, 372:2-9.
[48] Id. at 372:15-18.
[49] Id. at 372:19-23.
[50] Id. at 373:6-9.
[51] Id. at 366:15-20.
[52] Tr. Vol. 2 at 508:14-17.

reasonable and efficient option if alternatives were adequately considered. There are likely alternative plans that better meet Evergy's needs.

6. **Conclusion**

Evergy's 2024 IRP identifies a need for 650 MW of additional thermal capacity (325 MW in 2029 and 325 MW in 2030). However, the Application seeks predetermination for two 710 MW CCGT plants (Viola and McNew), with Evergy Kansas Central holding a 50% ownership stake in each—effectively doubling the infrastructure necessary to meet the identified need.

This proposed ownership structure is both inefficient and contrary to the public interest. A single 710 MW plant wholly owned by Evergy Kansas Central would suffice to meet projected capacity requirements, as was done with the Kansas Sky solar facility. Constructing two separate facilities significantly increases total capital expenditures, fixed operating costs, and environmental externalities without providing additional reliability or capacity benefits to Evergy Kansas Central's customers.

Furthermore, the duplication of facilities results in avoidable construction and environmental costs, and increases the long-term financial burden on ratepayers who will ultimately be responsible for cost recovery. The record does not support the necessity of two CCGTs, and this proposed configuration represents an overbuild relative to the Company's own IRP forecast.

Evergy's reliance on a mid-case natural gas price forecast presents significant methodological deficiencies. Notably, the forecast:

- Utilizes the Henry Hub national benchmark without adjusting for local basis differentials or volatility,
- Fails to account for peak demand price surges common in Kansas winters,

- Is based on outdated projections that have consistently underestimated actual delivered costs in prior years, with historical costs exceeding forecasted values by up to 90%,
- Omits a detailed fuel supply and risk mitigation plan.

These deficiencies introduce material uncertainty into long-term rate impacts. Given the volatility of the natural gas market, the lack of a robust and transparent fuel procurement strategy is particularly concerning. Historical data from Evergy's Hawthorn facility demonstrate a pattern of underestimating costs and overexposing customers to market spikes.

In the absence of a comprehensive fuel risk management strategy, the Commission cannot reasonably conclude that the proposed facilities represent a prudent or efficient resource choice.

The IRP modeling underpinning Evergy's proposal reflects an unjustified bias against battery storage, a lower-risk and increasingly cost-competitive alternative to gas generation. Specifically:

- Evergy arbitrarily limited ownership modeling to 50% or 100% stakes in the gas facilities, precluding consideration of more flexible ownership arrangements or smaller capacity additions using storage.
- The modeling fails to reflect cost efficiencies available through co-locating battery storage with existing or proposed infrastructure or leveraging sites with preexisting interconnection rights.
- The modeling excludes hybrid renewable-plus-storage scenarios that could meet capacity needs while reducing ratepayer exposure to volatile fuel markets.

These modeling choices result in a resource plan skewed in favor of CCGT construction, rather than reflecting a true least-cost, least-risk analysis.

Constructing two large-scale fossil fuel plants at this time is inconsistent with both state and national policy trends toward decarbonization. Approving this application would commit Evergy—and its customers—to decades of unnecessary greenhouse gas emissions and fuel market volatility. The proposal directly contradicts Kansas's evolving energy policy landscape and unnecessarily prolongs reliance on carbon-intensive infrastructure.

For the foregoing reasons, Renew Missouri respectfully urges the Commission to:

1. Deny Evergy's request for predetermination of ratemaking principles related to the Viola and McNew CCGT facilities;
2. Reject the non-unanimous settlement agreement insofar as it pertains to those facilities, as it is not supported by substantial evidence, does not ensure just and reasonable rates, and is not in the public interest;
3. Approve Evergy's request for predetermination of the Kansas Sky solar facility, which is aligned with IRP projections, broadly supported by parties, and reflects a cost-effective and environmentally responsible investment.

Respectfully,

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CERTIFICATE OF SERVICE
25-EKCE-207-PRE

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