**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.	**))))**	**Docket No. 25-EKCE-294-RTS**

CONFIDENTIAL DIRECT TESTIMONY

PREPARED BY

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UTILITIES DIVISION

KANSAS CORPORATION COMMISSION

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TABLE OF CONTENTS

I. INTRODUCTION 2

A. Qualifications 2

B. Purpose of Testimony 3

C. Executive Summary 3

II. REVENUE ALLOCATION & RATE DESIGN 4

A. Revenue Requirement Allocation 4

1. Description of Evergy's Request 4

2. Evergy's Support for Request 4

3. Staff's Analysis of the Request and Recommendation 5

B. Rate Design 9

1. Description of Evergy's Request 9

1. Evergy's Support for Request 11

1. Staff's Analysis of the Request and Recommendation 11

III. TARIFF CHANGES 14

A. New Optional C&I Time of Use Rate 14

1. Description of Evergy's Request 14

2. Evergy's Support for Request 15

3. Staff's Analysis of the Request and Recommendation 16

B. Off-Peak Rider Modification (Demand Ratchet Exemption) 17

1. Description of Evergy's Request 17

2. Evergy's Support for Request 18

3. Staff's Analysis of the Request and Recommendation 19

IV. LIGHTING 19

A. Non-LED Lighting Conversion Plan 19

1. Description of Evergy's Request 19

2. Support for Evergy's Request 19

3. Staff's Analysis of the Request and Recommendation 22

A. Street Lighting Schedule Modifications 22

1. Description of Evergy's Request 22

2. Support for Evergy's Request 23

3. Staff's Analysis of the Request and Recommendation 24

V. CONCLUSION 24

A. Summary of Recommendations Regarding Revenue Allocation & Rate Design 24

A. Summary of Recommendations Regarding Tariff Changes 24

B. Summary of Recommendations Regarding Lighting Conversion Plan and Schedule Modifications 25

I. INTRODUCTION

A. Qualifications

Q. What is your name?

A. Lana J. Ellis.

Q. By whom and in what capacity are you employed?

A. I am employed by the Kansas Corporation Commission (KCC or Commission) as Deputy Chief of the Economics and Rates Section within the Utilities Division.

Q. What is your business address?

A. 1500 S.W. Arrowhead Road, Topeka, Kansas, 66604-4027.

Q. What is your educational background and professional experience?

A. I have a B.S.B.A with a major in Honors Economics from Missouri Western State University, an M.A. in economics and an Interdisciplinary Ph.D. in economics and political science from the University of Missouri-Kansas City, an M.B.A. from Rockhurst University, and a J.D. from Seattle University. Before I began my employment with the Commission, I worked for Sprint Corporation and The Baltimore Sun, serving primarily in strategic planning and market research positions. In addition, I have taught graduate-level business and economics courses as an adjunct instructor at several universities, a list of which is available upon request.

Q. Have you previously submitted testimony before this Commission?

A. Yes, I filed testimony in Docket Nos. 14-KCPE-272-RTS, 14-BHCG-502-RTS, 15-WSEE-181-TAR, 16-KCPE-446-TAR, 17-WSEE-147-RTS, 18-WSEE-328-RTS, 18-KCPE-480-RTS, 18-KGSG-560-RTS, 19-EPDE-223-RTS, 20-SPEE-169-RTS, 21-BHCG-418-RTS, 22-EKME-254-TAR, 23-ATMG-359-RTS, 23-EKCE-775-RTS, 24-SPEE-415-TAR, 24-KGSG-610-RTS, 25-EKCE-169-TAR, and 25-BHCG-298-RTS. I have also participated, as a member of Commission Staff (Staff), in numerous other dockets, a list of which is available upon request.

B. Purpose of Testimony

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to sponsor Staff's recommendations regarding revenue allocation and rate design, the proposed C&I Time of Use Rate and Off-Peak Rider Modification, and the proposed Lighting Conversion Plan and Street Lighting Schedule modifications.

C. Executive Summary

Q. How is your testimony organized?

A. My testimony is organized in four major sections. First, I will discuss revenue allocation and rate design. Next, I will discuss the proposed C&I Time of Use Rate and Off-Peak Rider Modification. Then, I will discuss the proposed Lighting Conversion Plan and Street Lighting Schedule modifications. Finally, I will conclude by recommending the Commission adopt Staff's position as follows:

- Revenue allocation and rate design: Staff recommends the Commission adopt Staff's revenue allocation and rate design.
- C&I Time of Use Rate: Staff recommends the Commission adopt Evergy's proposed optional tariff without modification.
- Off-Peak Rider: Staff recommends the Commission adopt Evergy's tariff modifications eliminating the demand ratchet as proposed.
- The Lighting Conversion Plan: Staff recommends maintaining the status quo and allowing the non-LED lights to be replaced as they fail over time.
- The Street Lighting Schedules: Staff recommends the Commission adopt Evergy's tariff modifications aligning lighting codes across jurisdictions.

II. REVENUE ALLOCATION & RATE DESIGN

A. Revenue Requirement Allocation

1. Description of Evergy's Request

Q. What is Evergy's recommendation with regards to revenue allocation?

A. Evergy has proposed the following changes to class revenues based on an overall jurisdictional revenue requirement base rate increase of 13.59%:[1]

- Apply a 14.96% (approximately 110% of the jurisdictional rate increase) increase to the Residential, Churches, Schools, and EV/CCN, with the exception of BEV (Business Electric Vehicle).
- Apply a 13.05% (approximately 96% of the jurisdictional rate increase) increase to the Large Power (ILP) and Special Contracts.
- Apply a 12.64% (approximately 93% of the jurisdictional rate increase) increase to Small General Service.
- Apply a 11.97% (approximately 88% of the jurisdictional rate increase) increase to the Large General Service, Medium General Service, Large Tire Manufacturer, Interruptible Contract, and Lighting Classes.

2. Evergy's Support for Request

Q. CCOS Results

A. The results of Evergy's CCOS study show that each customer class is recovering the cost of service to that class and providing a return on investment, except the class Clean Charge Network/Electric Vehicles and Special Contracts classes.[2] Evergy's CCOS study results show the Residential, Churches, and Schools classes revenues are well below the Total Kansas Retail rate of return level while the remaining classes' revenues are above.[3] As explained by Evergy Witness Marisol Miller, the results of Evergy's study broadly inform their proposed class increases but not directly.[4]

[1] Miller Direct, pp. 15-16.
[2] Miller Direct, pp. 15-16.
[3] Miller Direct, pp. 17-18.
[4] Miller Direct, pp. 17-18.

3. Staff's Analysis of the Request and Recommendation

Q. What is rate design?

A. Rate design is both a process and the end result of the process. That is, the rate design process results in the rate design—the specific rates for customer groups.

Q. What is the rate design process?

A. The rate design process involves two major steps. The first step is the allocation of the revenue requirement to customer classes such as the Residential class. The second step is to establish rates in each of the customer classes that allow the utility to recover its approved revenue requirement.

Q. What are the essential requirements for developing a rate design?

A. Billing determinants and the CCOS study are the two essential requirements for rate design development.

Q. Please explain what billing determinants are and why they are important in rate design.

A. Billing determinants consist of all the data needed to generate existing and proposed revenues. They include the number of customers, demand, and usage volumes by rate block, along with the tariff rates necessary to generate existing and proposed revenues. Billing determinants are essential for constructing a proof of revenue, which (1) demonstrates that the company's revenue requirement can be recovered, and (2) provides a comparison of existing rates and proposed rates.

Q. Are Staff's and Evergy's Billing Determinants the same?

A. No. Staff's and Evergy's billing determinants differ because of differences in the results of weather normalization and customer annualization. In addition Staff updated customer counts through March 2024 to account for customer growth after the test year period. For an explanation of Staff's normalization processes, see the Direct Testimony of Staff Witness Robert Glass.

Q. What does a Class Cost of Service study do?

A. A Class Cost of Service (CCOS) study allocates to a utility's customers the costs incurred in providing electricity to those same customers. Since electric rates are set for classes of customers, the CCOS study allocates the cost of service to each rate class. The CCOS study broadly informs the rate analyst how much it costs to serve each class. Thus, using the CCOS study results as a starting point and guide for class allocation of the revenue requirement ensures the rate analyst is beginning the rate design process by employing the principle of cost causation.

While the link between the CCOS and cost causation is the basis for using a CCOS study for revenue allocation, CCOS studies do have limitations. First, CCOS studies are an art as much as they are science—a substantial number of subjective judgments must go into the production of any CCOS study. Second, because all CCOS studies are based on allocation mechanisms that are approximations of structural relationships, the CCOS studies must, themselves, be viewed as approximations. Third, the approximations of the structural relationships are not based on statistical theory (for the most part) so determining a confidence interval using statistical techniques is not possible. Fourth, a CCOS study is a static snapshot of a dynamic process. Over time, the structural cost relationships have changed and are expected to change in the future. Thus, a rate analyst should be cautious when using a CCOS study to help determine class revenue allocations.

Q. Did Staff provide CCOS study in this Docket?

A. Yes. Staff Witness Kristina Luke-Fry sponsors Staff's CCOS study in her Direct Testimony.

Q. What are Staff's recommended changes Evergy's revenue requirement?

A. Staff is recommending a $113,770,652 increase in Evergy's revenue requirement.

Q. How were the changes in revenue requirement allocated?

A. Table 1 has Staff's allocation of revenue requirement.

Table 1: Allocation of Revenue Requirement Increase by Class

Allocation of the Increase in Revenue Requirement Among Customer Classes								
	Revenue with Current Rates $	Relative Rate of Return	Equal Rate Increase in Class Revenue	Actual Increase in Class Revenue	Class Share Equal Increase in Revenue	Class Share in Revenue	Total Allocated Revenue $	Share of Total Allocated Revenue
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Residential	$ 640,295,893	0.88	$ 58,190,118	57,946,778	51.1%	50.9%	$ 698,242,671	51.1%
Residential DG	$ 6,942,311	1.29	$ 630,918	624,808	0.6%	0.5%	$ 7,567,119	0.6%
Small General Service	$ 139,497,049	1.57	$ 12,677,498	12,554,734	11.1%	11.0%	$ 152,051,783	11.1%
Medium General Service	$ 153,360,645	1.50	$ 13,937,422	13,802,458	12.3%	12.1%	$ 167,163,103	12.2%
Schools Services	$ 37,527,798	0.45	$ 3,410,528	3,660,701	3.0%	3.2%	$ 41,188,499	3.0%
Church Service	$ 1,887,706	0.45	$ 171,555	184,139	0.2%	0.2%	$ 2,071,845	0.2%
Large General Service	$ 182,367,978	1.20	$ 16,573,610	16,413,118	14.6%	14.4%	$ 198,781,096	14.6%
Large Power Service	$ 8,262,314	(0.04)	$ 750,879	805,959	0.7%	0.7%	$ 9,068,273	0.7%
Interruptible Service	$ 305,443	(0.04)	$ 27,759	29,795	0.0%	0.0%	$ 335,238	0.0%
Large Tire Manufacturer	$ 4,789,406	(0.04)	$ 435,261	467,189	0.4%	0.4%	$ 5,256,595	0.4%
Special Contracts	$ 48,960,342	(0.04)	$ 4,449,518	4,775,905	3.9%	4.2%	$ 53,736,247	3.9%
Business EV Service	$ 980,878	0.71	$ 89,142	88,769	0.1%	0.1%	$ 1,069,647	0.1%
Lighting Service	$ 26,699,426	0.71	$ 2,426,445	2,416,298	2.1%	2.1%	$ 29,115,724	2.1%
TOTAL	$ 1,251,877,190	1.00	$ 113,770,652	$ 113,770,651	100.0%	100.0%	$ 1,365,647,841	100.0%

Column (1) has the current revenue for each class generated by the current rates; Column (2) has the relative rate of return for each class from the CCOS for the appropriate service territory; Column (3) has the revenue requirement allocation if each class got the same proportion of the change in revenue requirement as that class's proportion of the total revenue generated with current rates; Column (4) has Staff's proposed change in revenue requirement allocation; Column (5) has the class percentage share of the equal change in revenue requirement; Column (6) has the class percentage share of the actual change in revenue requirement; Column (7) is the sum of the revenue with current rates, Column (1) and the allocated increase in class revenue, Column (4); and Column (8) is the class share of total revenue, Column (7).

Q. How did you arrive at the allocation of the change in revenue requirement?

A. The first step was to calculate an equal proportional change in revenue requirement based on the proportion of current rate each class had of the total revenue. More specifically, I divided the class revenue by the total revenue and multiplied that proportion times the total change in revenue requirement. The equal proportional change would represent a neutral change for a customer class. The result of this calculation is in Column 3 of Table 1.

The second step was to go to the CCOS and get the class relative rate of returns. A change based solely on a class's relative rate of return would be the most extreme change in revenue. I used the equal proportion allocation and the relative rate of return as the lower and upper bounds to the targeted revenue requirement allocation. The targeted change in revenue requirement represents an 9.09% increase in revenue. Table 2 below shows the increase and the percentage increase in class revenue requirement. In general, Staff moved the percentage change in revenue requirement in the direction, but not the magnitude, indicated by the class relative rate of return.

Table 2: Allocation of Revenue Requirement Increase by Class

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. Were you able to design rates to collect the revenue allocation targets?

A. Due to rounding of rates, it is not possible to design rates that exactly recover the revenue target.

Q. What is your recommendation regarding revenue allocation?

A. I recommend the Commission accept Staff's revenue allocation presented above.

B. <u>Rate Design</u>

1. Description of Evergy's Request

Q. What is Evergy's recommendation regarding rate design?

A. Utilizing the results of the CCOS and the Residential Class relative rate of return relative to other classes, Evergy applied approximately 110% of the jurisdictional revenue requirement (14.96% class increase) to Residential class revenues with a proposed customer charge of $16.38.[5] The $16.38 proposed customer charge is the result of evenly spreading the 14.96% increase to both fixed and variable charges.[6] The Churches, Schools, and Electric Vehicle Classes received approximately 110% of the jurisdictional increase (14.96% class increase), Special Contracts and ILP received approximately 96% of the jurisdictional increase (13.05% class increase), Small General Service received approximately 93% of the jurisdictional increase (12.64% class increase), and MGS, LGS, LTM, Interruptible Contract, and Lighting received approximately 88% of the increase (11.96% class increase).[7] Generally, for C&I classes, the rate increase was applied equally to all components.

The proposed increase for BEV/ETS is limited to the Large General Service increase and the CCN increase is limited to the Residential increase.[8] The Company proposes that the revenue shortfall resulting from its recommended increases for the EV rates be absorbed by the Large General Service class. Additionally, in accordance with the 23-775 Docket, LED lighting components, Off-Peak Lighting, and Traffic Signals were given 25% of the class increase of 11.96%.[9] Non-LED lighting received a larger increase of 38.23% to make up the remaining revenue allocated to the Lighting class.

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[5] ***See*** Miller Direct, pp. 19-20. "The base rate design the Company is proposing reflects an annual aggregate increase over current base rate revenues in the amount of $192.1 million (13.59%). The net impact on customers as a result of the Company's proposals in this docket would be an increase of $196.4 million, or 13.89%."

[6] *See* Miller Direct, pp. 19-20. This proposed amount is below the recommended CCOS customer charge of $18.39 which represents the customer charge inclusive of the jurisdictional rate increase on an equalized basis. The Company opted to propose a lesser amount to help manage the impact to lower use customers but hopes to make continued progress towards the equalized customer charge in subsequent rate cases, consistent with prior Commission approved customers charges.

[7] *See* Miller Direct, pp. 19-20.

[8] *See* Winslow Direct p. 36. Winslow recommends tying the proposed rate increase in Schedule CCN to the proposed Residential class rate increase and tie the proposed rate increase in Schedule BEVCS and Schedule ETS to the LGS class rate increase.

[9] In the 2023 case, the Commission ordered that EKC non-LED lighting receive a higher increase than the LED lighting to highlight the continuing obsolescence of non-LED lighting and reinforce the price incentive to move to LED alternatives.

1. Evergy's Support for Request

Q. What was Evergy's support for it proposed rate design?

A. As discussed above, the results of Evergy's CCOS study broadly informed the proposed rate design.[10] As explained by Evergy Witness Miller, "[t]he exact application of changes in rates that aim for an equalized rate of return by class would have been extremely detrimental to our residential customers and not in line with sound rate design principles. Instead, the Company opted for a gradual approach to adjusting revenues and rates to reflect CCOS results."[11] The $16.38 proposed residential customer is below Evergy's CCOS indicated customer charge of $18.39 which represents the customer charge inclusive of the jurisdictional rate increase on an equalized basis.[12] Evergy chose the lesser amount in this rate case to help manage the impact to lower use customers but indicates it plans to make continued progress towards the equalized customer charge in subsequent rate cases.

1. Staff's Analysis of the Request and Recommendation

Q. Does Staff agree with Evergy's proposed methodology for designing rates that recover each class's allocated revenue requirement?

A. Yes. Given the number of rate codes and the complexity of Evergy's rate structures, Staff agrees evenly spreading class increases to both fixed and variable charges is reasonable. Staff also acknowledges the exceptions outlined in Evergy Witness Miller's direct testimony.

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[10] *See* Miller Direct, pp. 17-18.
[11] Miller Direct, pp. 17-18.
[12] Miller Direct, p. 19.

Q. How were Staff's rates for the customers in the different customer classes determined?

A. Like Evergy, Staff's rates were determined by multiplying the different charges by the fixed percentage necessary to increase the class revenue requirement the allocated amount. The resulting residential rates and bill impact are shown in Table 3 below.

Q. Have you calculated the bill impact of the increase in revenue requirement?

A. Yes. Table 3 has the bill impact on residential customers for Evergy.

Table 3: Residential Bill Impact

Residential Standard Service											
Elecric Usage in kWh			600		900		1500		2000		3000
Current Rates											
Basic Service Fee	$	14.25	$ 14.25	$	14.25	$	14.25	$	14.25	$	14.25
Winter Energy											
1st block - 900 kWh	$	0.082880	$ 49.73	$	74.59	$	74.59	$	74.59	$	74.59
2nd block - additional kWh	$	0.067750	$ -	$	-	$	40.65	$	74.53	$	142.28
Summer Energy											
1st block - 900 kWh	$	0.082880	$ 49.73	$	74.59	$	74.59	$	74.59	$	74.59
2nd block - additional kWh	$	0.091430	$ -	$	-	$	54.86	$	100.57	$	192.00
Riders											
PTS	$	0.000510	$ 0.31	$	0.46	$	0.77	$	1.02	$	1.53
TDC	$	0.026500	$ 15.90	$	23.85	$	39.75	$	53.00	$	79.50
EER	$	0.000251	$ 0.15	$	0.23	$	0.38	$	0.50	$	0.75
RECA	$	0.017878	$ 10.73	$	16.09	$	26.82	$	35.76	$	53.63
New Rates											
Basic Service Fee	$	15.54	$ 15.54	$	15.54	$	15.54	$	15.54	$	15.54
Winter Energy											
1st block - 900 kWh	$	0.090380	$ 54.23	$	81.34	$	81.34	$	81.34	$	81.34
2nd block - additional kWh	$	0.073880	$ -	$	-	$	44.33	$	81.27	$	155.15
Summer Energy											
1st block - 900 kWh	$	0.090380	$ 54.23	$	81.34	$	81.34	$	81.34	$	81.34
2nd block - additional kWh	$	0.099700	$ -	$	-	$	59.82	$	109.67	$	209.37
Riders											
PTS	$	-	$ -	$	-	$	-	$	-	$	-
TDC	$	0.026500	$ 15.90	$	23.85	$	39.75	$	53.00	$	79.50
EER	$	0.000251	$ 0.15	$	0.23	$	0.38	$	0.50	$	0.75
RECA	$	0.017878	$ 10.73	$	16.09	$	26.82	$	35.76	$	53.63
Bill Impacts of Current and Proposed Rates											
Winter Bill—Current Rates			$ 90.76	$	129.01	$	196.44	$	252.63	$	365.00
Winter Bill—Proposed Rates			$ 96.55	$	137.05	$	208.15	$	267.41	$	385.92
Percentage Increase			6.4%		6.2%		6.0%		5.9%		5.7%
Summer Bill—Current Rates			$ 90.76	$	129.01	$	210.64	$	278.67	$	414.73
Summer Bill—Proposed Rates			$ 96.55	$	137.05	$	223.65	$	295.81	$	440.14
Percentage Increase			6.4%		6.2%		6.2%		6.1%		6.1%
NOTE 1: The Riders are: PTS = Property Tax Surcharge, TDC = Transmission Delivery Charge, EER = Energy Efficiency Rider, and RECA = Retail Energy Cost Adjustment											

Q. What is your recommendation regarding rate design?

A. I recommend the Commission accept Staff's rate design presented above.

III. TARIFF CHANGES

A. New Optional C&I Time of Use Rate

1. Description of Evergy's Request

Q. Please describe Evergy's Optional C&I Time of Use Rate.

A. Evergy is proposing an optional three-period, four-part TOU rate that will be available to the Medium General Service, Large General Service, and Industrial & Large Power customer classes. Specifically, the Company has proposed new Schedule MGS-TOU, Schedule LGS TOU, and Schedule ILP-TOU to offer this rate design to commercial and industrial ("C&I") customers.[13] The four-part structure consists of a customer charge, facilities charge, demand charge, and energy charge.[14] The energy charge is in the form of a three-periods with an "on-peak" period from 3 pm to 7 pm on non-holiday weekdays in summer months, a "super-off-peak" period from midnight to 6 am every day throughout the year, and an "off peak" period for all other hours of the year.[15]

The proposed rates are designed to be revenue neutral at the class level. However, it is difficult to estimate how many customers will take service under the schedule and how aggressive those customers will be in changing their behavior to take advantage of the off-peak and super off-peak pricing.[16] While high adoption could reduce the revenue recovered through the rate itself, could potentially lower costs in conjunction with the shifts in energy usage as the Company procures less energy during the higher cost hours.[17] Should the net revenue impact be larger than expected, Evergy states it may seek relief

[13] *See* Lutz Direct, p. 3.
[14] *See* Lutz Direct, p. 5.
[15] *Id.*
[16] *See* Lutz Direct, p. 10. Evergy expects the optional schedule will mainly attract customers that stand to benefit from the proposed rate.
[17] *Id*. Those cost savings are expected to flow to all customers through the Retail Energy Cost Adjustment.

through an Accounting Authority Order or other mechanism.[18] Moreover, Evergy believes it is reasonable to expect the rate design to change over time to adjust to future conditions.[19]

2. Evergy's Support for Request

Q. What is the background regarding the optional C&I Time of Use Rate?

A. In the 23-775 Docket, Evergy agreed to evaluate an optional, non-residential time of use rate. Paragraphs 45 of the settlement agreement specifically states:[20]

> 45. In its next full, general rate proceeding the Company commits to propose an optional, non-residential time-variant rate or will offer testimony updating the Commission on its status regarding non-residential time-variant rates.

Q. What steps did the Company take to address this commitment?

A. Evergy started with an email message to C&I customer representatives who were intervenors in the 23-EKCE-775-RTS docket, seeking to confirm interest in joining the design effort and to begin a series of meetings.[21] A total of four meetings were held with the Customer Group, complemented with periodic email updates.[22] Through participation and exchanges with the Customer Group, direct input and feedback were received concerning the rate design.[23] Evergy then retained The Brattle Group as an outside

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[18] *Id.*
[19] *Id.* Evergy expects customer loads and system costs to change, which could lead to adjustment of the TOU periods. The Company or customers could bring forward proposals to refine the classification of costs between demand and energy.
[20] Docket 23-EKCE-775-RTS Settlement Agreement.
[21] The group formed included representatives of Kansas Chamber of Commerce and Industry, Inc.; Wichita Regional Chamber of Commerce; the United States Department of Defense; Kansas Industrial Consumer Group; Lawrence Paper Company; Spirit AeroSystems, Inc.; Occidental Chemical Corporation; Goodyear Tire & Rubber Company; Associated Purchasing Services Corporation; United School District #259 Sedgwick County, Kansas; Johnson County Community College; USD 223 Olathe School District; USD 512 Shawnee Mission School District; USD 232 DeSoto School District; USD 229, the Blue Valley School District; CVR Refining CVL, LLC; HF Sinclair El Dorado Refining LLC; and Walmart, Inc.. Collectively, the "Customer Group."
[22] *See* Lutz Direct, pp. 4-5.
[23] *See* Lutz Direct, p. 5.

consultant to help determine the rate design and pricing for the Company based on design details formulated through the Customer Group meetings.[24]

Q. Please summarize how the rate structures and pricing were developed.

A. The design process began with identifying the TOU periods. Using the summer and winter periods common to other rate schedules, costs for generation, distribution, and energy were assigned to each hour of the year. The hourly cost totals and the resulting periods led Evergy to propose three TOU periods in the summer months and two TOU periods in the winter months.[25] Next, costs were assigned to the individual rate components—customer, facilities demand, demand, and energy charges. The rates are designed to be revenue neutral at the customer class level.

3. Staff's Analysis of the Request and Recommendation

Q. What is your recommendation regarding Evergy's Off-Peak Rider proposal?

A. Staff has reviewed the analysis and finds the proposed rate design and prices to be reasonable. Staff has general concerns about adding complexity to Evergy's schedules. However, in this case, Staff recommends approval because the voluntary rates were developed in conjunction with stakeholders in accordance with the 23-775 settlement agreement and are revenue neutral at the class level.

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[24] *See* Lutz Direct, p. 5.

[25] *See* Lutz Direct, pp. 7-8. Since EKC is a summer peaking utility, it is reasonable to expect the higher costs in those hours for the summer months. Establishing the on-peak period from 3pm to 7 pm aligns closely with on-peak periods used for other TOU rates in EKC, EKM, and rates in the Missouri jurisdiction providing administrative benefits. Turning to the winter months, less price variability is observed. Instead of forcing the winter design to three periods and having period pricing with little to no difference, Evergy chose to only provide for two TOU periods in the winter months.

B. <u>Off-Peak Rider Modification (Demand Ratchet Exemption)</u>

1. Description of Evergy's Request

Q. What is being proposed?

A. Evergy is proposing to exempt customers on the Off-Peak Rider service from a demand ratchet.[26]

Q. Please explain Evergy's Off-Peak Rider and demand ratchet?

A: The Off-Peak Rider is a supplemental service offered to C&I customers that allows a C&I customer to exceed its On-Peak demand during off peak hours and not be billed for that excess demand, which incentivizes off-peak rather than on-peak demand when costs are highest.[27] The demand ratchet establishes a limit on the highest billing demand established during the summer season within the most recent 11 months.[28]

Q. How many customers are currently utilizing the Off-Peak Rider?

A. There are four customers currently on the Off-Peak Rider—one Small General Service Class customer, one Medium General Service class customer, and two Large General Service Class customers. The demand ratchet establishes a cap on billing demand of 50% for MGS and 85% for LGS of their highest billing demand established during the summer season within the most recent 11 months.[29] A demand ratchet does not currently apply to the SGS class.[30]

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[26] *See* Miller Direct, pp. 21-22.
[27] *Id*.
[28] *Id.*
[29] *Id.*
[30] *Id.*

2. Evergy's Support for Request

Q. Why is this change being proposed?

A. The existence of the demand ratchet limits the customers potential savings by setting a minimum billing demand based on past usage, regardless of current or future demand levels.[31] For customers this limits potential bill savings that customers interested in managing their demand throughout the year and participating in the Off-Peak Rider might experience from reducing their demand in the winter months.[32] Thus, removal of the demand ratchet would enable customers to more fully benefit from their modified usage and not be unduly disincentivized by billing minimums.[33]

Q. Please explain the Off-Peak Rider analysis that was conducted in support of this proposal?

A. Fifteen-minute interval data collected for the four customers was used to calculate what the maximum demand would be if the demand ratchet was removed.[34] Once the maximum demand was identified, the billing determinants were used to calculate bill impacts for the four customers.[35] This analysis estimated customers on MGS and LGS rates will experience decreases in their demand charges ranging from 2-26% with the most significant bill reductions occurring in the summer months.[36] Since the demand ratchet does not apply to the Small General Service class, one customer will not be affected at all by the recommended revisions to the Off-Peak Rider tariff.[37]

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[31] *Id.*
[32] *Id.*
[33] *Id.*
[34] *Id.*
[35] *Id.*
[36] *Id.*
[37] *Id.*

3. Staff's Analysis of the Request and Recommendation

Q. What is your recommendation regarding Evergy's the Off-Peak Rider proposal?

A. Staff agrees eliminating the existing demand ratchet, which limits the effect of the Off-Peak Rider, would potentially increase the level of benefit for these customers. Therefore, I recommend the Commission accept Evergy's proposal to exempt Off-Peak Rider customers from a demand ratchet.

IV. LIGHTING

A. <u>Non-LED Lighting Conversion Plan</u>

1. Description of Evergy's Request

Q. What is Evergy proposing in regard to lighting conversion?

A. Evergy proposes to initiate a three-year systematic conversion of the remaining non-LED private, unmetered lighting to the more energy-efficient LED lights on a geographic area basis. Or alternatively, maintaining the status quo and allowing the non-LED lights to be replaced as they fail over time.

2. Support for Evergy's Request

Q. What is the background regarding the LED-Lighting Conversion Plan?

A. In the 23-775 Docket, the Parties agreed to terms concerning lighting beyond the pricing-related terms for LED lighting discussed above. Paragraphs 48 and 49 of the settlement agreement state:

> 48. The Parties agree that the Company should notify customers with non-LED lighting of the cost savings and benefits associated with adopting LED lighting. Communications will be quarterly with at least one communication via direct letter to customers.
>
> 49. If customers remain on non-LED lighting at the time of the next full, general rate case filing, the Company will offer testimony detailing a plan to proactively move customers to LED alternatives.

Q. Did Evergy perform the customer notifications?

A. Yes. Evergy used a mix of direct contact, email, and postcards to notify customers known to have non-LED lighting quarterly through 2024, specifically in March, June, September and December.[38] In addition, personnel who support and manage the Evergy's largest customers integrated this notification into their regular customer interactions.[39]

Q. Did these communications lead customers to proactively convert their lights to LED fixtures?

A. Unfortunately, no notable response was observed as the number of light replacements after the communications were largely the same as the replacement numbers from periods prior to the communications.[40]

Q. Since some customers remain on non-LED lighting at this time, what is Evergy proposing for converting these customers to LED lighting?

A. Evergy is proposing a three-year systematic conversion of the remaining non-LED private, unmetered lighting to LED lights on a geographic area basis, which means the Evergy would identify areas managed by Evergy's service centers and the service center personnel would visit the known locations of non-LED lights within their respective areas, replacing them with LED lighting having equivalent lumen output.[41] The proposed Conversion Plan includes communications with customers via email or letter prior to the conversion, web-based information, and a door hanger to be left at the time of the conversion.[42] In addition, Call Center personnel would be informed of the plan and able to address calls made by

[38] *See* Lutz Direct, p. 12.
[39] *Id*.
[40] *Id*.
[41] *See* Lutz Direct, p. 15.
[42] *Id*.

customers.[43] The plan also includes provisions to refine records and address any non-LED lights not identified as part of the plan.[44]

Q. What is the estimated cost for the proposal?

A. Evergy's total cost estimate for the plan is $7.4 million, which includes the cost of materials, labor, and overheads associated with conversion of the identified population of non-LED private, unmetered lights.[45] However, due to its lack of direct experience with a conversion of this scope, Evergy's confidence around the cost estimate is low.[46] Also, inconsistencies were identified in the records while preparing the estimate, where lighting records exist in the billing system but no matching location is identified in the Geographic Information System.[47] In these cases, service personnel will only have a customer billing address to identify the location of the light.[48] Because the lights could be anywhere on a property, there are concerns service personnel would not be able to readily locate these lights and the high degree of customer interaction needed makes the conversion pace estimates less precise.[49]

Q. Does the Company endorse this plan?[50]

A. Evergy believes the plan is sound and would achieve conversion of most non-LED lights to LED equivalent fixtures.[51] However, acknowledging the cost and uncertainty of the estimate, Evergy finds it is difficult to wholly endorse the Conversion Plan.[52] Although

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[43] *Id.*
[44] *See* Lutz Direct, p. 18.
[45] *Id.*
[46] *See* Lutz Direct, p. 19.
[47] *Id.*
[48] *Id.*
[49] *Id.*
[50] *See* Lutz, Direct p. 20.
[51] *See* Lutz Direct, p. 19.
[52] *Id.*

the goal is to convert all non-LED lights to LEDs, there are certain issues that could prevent achieving 100% conversion within the duration of the Conversion Plan.[53] While Evergy is sympathetic to the concern about customers continuing to rely on obsolete lighting technologies and paying more than they would under current lighting technologies, Evergy is concerned the conversion cost may be prohibitive and having all other customers bear the cost of the proactive conversion may be unreasonable.[54]

Q. If the Conversion Plan is not adopted, will the non-LED lights be replaced eventually?

A. Yes. Under the current tariffs, obsolete technologies are switched to an LED equivalent at the time of failure. However, because these lighting technologies are durable, it could take decades for all the fixtures to fail and eliminate non-LED lighting.

3. Staff's Analysis of the Request and Recommendation

Q. What is Staff's Recommendation regarding the conversion of non-LED lights?

A. Staff shares Evergy's concerns about the cost of systematically replacing the non-LED lighting. Therefore, Staff recommends maintaining the status quo and allowing the non-LED lights to be replaced as they fail over time.

A. Street Lighting Schedule Modifications

1. Description of Evergy's Request

Q. What is Evergy's proposal with regards to the Street Lighting Schedule Modifications?

A. Evergy is proposing to change the layout and revise the content of the Municipal Street Lighting Service tariff, Schedule SL. Consistent with the outcome of the 23-775 Docket,

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[53] *See* Lutz Direct, p. 19. Evergy expects that some non-LED lights would not be switched to LEDs as expected. For example, Evergy expects a number of lights would not be converted because personnel may not be able to gain access to the light or some form of customer objection arises. Evergy also expects some visits will lead to identification of electrical safety issues that will need to be resolved before a light conversion can occur. These lights would need to be maintained or resolved through an effort extending beyond the three-year duration, outside the scope of the plan.

[54] *Id.*

Evergy is proposing new LED lighting codes that support a common lumen range between Evergy's jurisdictions.[55] To implement this change, the Evergy is proposing a revised layout to the tariff that includes more detail about the lighting options offered.[56] Evergy also proposes standardizing the Availability terms applicable to Municipal Street Lighting.[57]

Q. Please describe the proposed revision to the Schedule SL Availability and Applicability sections.

A. Evergy is seeking to consolidate the Availability and Applicability sections of the current schedule into a single Availability section.[58] Further, the availability language is modified to include a more detailed description of municipal customer.[59]

Q. Does Evergy propose any other changes to the LED lighting offered under Schedule SL?

A. Yes. Evergy also proposes adjusting the lumen ranges to align with the LED options maintained in its inventory.[60] The monthly kWh values for each option have also been updated to reflect LED technology efficiency improvements.[61]

2. Support for Evergy's Request

Q. Please describe the new LED lighting codes and why the change is beneficial.

A. According to Evergy, the existing LED class codes were established by Westar at the time the streetlights were converted to LED technologies.[62] The alphabetic codes corresponded to the groupings of fixtures available at the time.[63] Similar naming conventions were

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[55] *See* Lutz Direct, pp. 21-23.
[56] *Id*.
[57]. *Id.*
[58] *Id.*
[59] *Id.*
[60] *Id.*
[61] *Id.*
[62] *Id.*
[63] *Id.*

followed by the other legacy companies.[64] Now, operating as a combined company, differences in these class codes have become problematic to alignment of processes.[65] Thus, Evergy is proposing these various alphabetical codes be brought into alignment under new, numeric class codes.

3. Staff's Analysis of the Request and Recommendation

Q. Does Staff agree aligning these processes across jurisdictions would increase operational efficiencies, leading to improved service and reduced costs for customers?

A. Yes, Staff agrees aligning classification codes across jurisdictions would increase operational efficiencies, leading to improved service and reduced costs for customers. Therefore, Staff recommends the Commission accept Evergy's street lighting schedule modifications as proposed.

V. CONCLUSION

Q. Please provide a summary of Staff's recommendations in this Docket.

A. Staff recommends the Commission adopt Staff's position as follows below.

A. Summary of Recommendations Regarding Revenue Allocation & Rate Design

Q. Please summarize your recommendations regarding Revenue Allocation and Rate Design.

A. With regard to Rate Design, Staff recommends the Commission adopt Staff's proposed revenue allocation and rate design.

A. Summary of Recommendations Regarding Tariff Changes

Q. Please summarize your recommendations regarding tariff changes.

A. With regard to Tariff Changes, Staff recommends the Commission adopt Evergy's proposed tariff changes without modification.

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[64] *Id.*

[65] *See* Lutz Direct, pp. 21-23.

B. Summary of Recommendations Regarding Lighting Conversion Plan and Schedule Modifications

Q. Please summarize your recommendations regarding Lighting.

A. With regard to Lighting Conversion Plan, Staff recommends maintaining the status quo and allowing the non-LED lights to be replaced as they fail over time. With regard to the Street Lighting Schedule Modifications, Staff recommends the Commission accept Evergy's street lighting schedule modifications as proposed.

Q. Does this conclude your testimony?

A. Yes. Thank you.

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

VERIFICATION

Lana Ellis, being duly sworn upon his oath deposes and states that she is Deputy Chief of Economics and Rates of the Utilities Division of the Kansas Corporation Commission of the State of Kansas, that she has read and is familiar with the foregoing Direct Testimony, and attests that the statements contained therein are true and correct to the best of her knowledge, information and belief.

Lana Ellis
Deputy Chief of Economics and Rates
State Corporation Commission of the
State of Kansas

Subscribed and sworn to before me this 4th day of June, 2025.

Kiley McManaman
Notary Public

Kiley McManaman
NOTARY PUBLIC—STATE OF KANSAS
MY APPT EXP: 04/09/2025

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25-EKCE-294-RTS

I, the undersigned, certify that a true copy of the attached Direct Testimony has been served to the following by means of electronic service on June 6, 2025.

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