

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

In the Matter of the Application of Evergy Metro, Inc.,)
Evergy Kansas Central, Inc., and Evergy Kansas) Docket No. 25-EKCE-169 TAR
South, Inc. for Approval of its Phase 2 Transportation)
Electrification Portfolio.)

JOINT MOTION FOR APPROVAL OF UNANIMOUS SETTLEMENT AGREEMENT

COME NOW, Evergy Metro, Inc. (“Evergy Kansas Metro”), Every Kansas Central, Inc. and Evergy Kansas South, Inc. (together as “Evergy Kansas Central”) (collectively referred to herein as “Evergy” or the “Company”), The Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission,” respectively) the Citizens’ Utility Ratepayers Board (“CURB”) (collectively referred to as “the Joint Movants”), hereby respectfully move the Commission for an Order approving the Unanimous Settlement Agreement (“Settlement” or “Settlement Agreement”) attached as **Attachment A**, and incorporated herein by reference. In support of this Motion, Joint Movants state the following:

1. On September 30, 2024, Evergy filed the Application in this docket seeking an order from the Commission allowing the Company to implement its Phase 2 Transportation Electrification Portfolio (“Portfolio”) comprised of a Fleet Advisory Services (“FAS”) Program and a Residential Managed Charging (“RMC”) Pilot. Transportation Electrification (“TE”) refers to the transition from vehicles powered by an internal combustion engine (“ICE”) to those powered partially or fully by electricity.

2. On December 3, 2024 the Commission issued an Order Setting Procedural Schedule (“Procedural Order”) establishing, among other things, the dates for responsive

testimony, settlement conferences, a prehearing conference, and an evidentiary hearing in this docket.

3. Consistent with the Procedural Order, the Parties met virtually on February 24, 2025 to discuss resolution of the issues. As a result of those negotiations, the Joint Movants were able to reach unanimous agreement on the issues under review in this docket.

4. Joint Movants believe approval of the Settlement Agreement is in the public interest, and will not result in or create unreasonable rates for Evergy customers.

5. Pursuant to the Procedural Order, Joint Movants will file testimony in support of the Settlement agreement by March 3, 2025.

6. Joint Movants are aware the Procedural Order includes a prehearing conference scheduled for March 7, 2025 as well as an evidentiary hearing in this docket scheduled for March 17, 2025. Joint Movants believe that, upon timely submission of the Settlement Agreement and testimony in support, this matter can likely proceed to approval of the unanimous Settlement Agreement without a hearing thereon, and therefore respectfully request that the prehearing conference and evidentiary hearing be cancelled. However, if the Commission believes either scheduled hearing would be helpful for its evaluation of the Settlement Agreement, the parties are willing to appear at the Commission's direction.

WHEREFORE, Joint Movants respectfully request the Commission issue an order granting the present Motion, thereby approving the attached Settlement Agreement, and for all such further and additional relief the Commission deems just and reasonable.

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ATTACHMENT A

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

In the Matter of the Application of Evergy)
Metro, Inc., Evergy Kansas Central, Inc., and) Docket No. 25-EKCE-169-TAR
Evergy Kansas South, Inc. for Approval of its)
Phase 2 Transportation Electrification Portfolio.)

UNANIMOUS SETTLEMENT AGREEMENT

After conducting discovery and engaging in a series of settlement discussions, Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (together as “Evergy Kansas Central”) and Evergy Metro, Inc. (“Evergy Kansas Metro”) (collectively as “Evergy” or “Company”); the Staff of the State Corporation Commission of the State of Kansas (“Staff”); and the Citizens’ Utility Ratepayer Board (“CURB”) (all Parties referred to collectively as “Signatories”), the Signatories enter into this Unanimous Settlement Agreement (“Settlement Agreement”) intending to resolve all matters in this docket and agreeing to present this Settlement Agreement to the Commission for approval.

Background

1. On September 30, 2024, Evergy filed with the Commission an Application requesting approval to implement its Phase 2 Transportation Electrification Portfolio (“Phase 2 Portfolio”),¹ which is comprised of a Fleet Advisory Services (“FAS”) Program and a Residential Managed Charging (“RMC”) Pilot.

¹ Evergy Application (Sept. 30, 2024).

2. Concurrently with its Application, Evergy is also filing supporting testimony from Company witness Kimberly H. Winslow.²

3. CURB was granted intervention on November 5, 2024.³ No other parties petitioned to intervene in this docket.

4. On December 3, 2024, the Commission issued an Order Setting Procedural Schedule (“Procedural Order”) setting forth, inter alia, the dates for responsive testimonies, settlement discussions, a prehearing conference, and an evidentiary hearing.⁴

5. On January 23, 2025, CURB and Staff each filed direct testimony in this docket. Josh Frantz, testifying on behalf of CURB, recommended the Commission approve the Phase 2 Portfolio as proposed in Evergy’s direct filing.⁵ Lana Ellis, testifying on behalf of Staff, recommended the Commission approve the Phase 2 Portfolio as proposed in Evergy’s direct filing with certain suggested modifications. Staff’s suggested modifications were addressed during settlement discussions and are fully resolved by the terms of this Agreement, as set forth below.

6. On February 20, 2025, Evergy filed rebuttal testimony from three witnesses: Julie Dietrich, Tim Nelson, and Wendy Marine.⁶

Terms of Settlement Agreement

The Signatories hereby agree that Evergy’s Phase 2 Portfolio shall be consistent with the Phase 2 Portfolio proposed in the Company’s direct filing with the following modifications:

I. Fleet Advisory Services (“FAS”) Program

a. Program Levels and Design

1. The Program Description shall be as follows: This program meets the diverse needs of customers electrifying their fleets with a multi-level service offering. As shown

² Direct Testimony of Kimberly H. Winslow (filed September 30, 2024).

³ Order Granting CURB’s Petition to Intervene; Protective and Discovery Order (Nov. 5, 2024).

⁴ Order Setting Procedural Schedule (Dec. 3, 2024).

⁵ Direct Testimony of Josh Frantz on Behalf of CURB and Direct Testimony of Lana Ellis on Behalf of the KCC (filed January 23, 2025).

⁶ Rebuttal Testimony of Julie Dietrich on Behalf of Evergy, Rebuttal Testimony of Tim Nelson on Behalf of Evergy, and Rebuttal Testimony of Wendy Marine on Behalf of Evergy (filed Feb. 20, 2025).

in the table below, Level 1 offers one-on-one advisory assistance and leverages Evergy's Online Tool. Levels 2 and 3 include the offerings from Level 1, plus customized analysis and calls with an advisor when more support is needed.

FAS PROGRAM OFFERINGS	LEVEL 1	LEVEL 2	LEVEL 3
Customer Readiness			
Application Review and Acceptance	✓	✓	✓
Fleet Advisory Introductory Call	✓	✓	✓
Fleet Advisory Data Summary Review Call	✓	✓	✓
Total Cost of Ownership (TCO) Data Input Call	✓	✓	✓
Data Analysis & Fleet Assessment			
High-Level TCO with Evergy Online Tool (Includes General Incentives Info and Rate Education)	✓		
Customized TCO Analysis (Evaluate Vehicle Types, Routes, and Usage Patterns)		✓	✓
Detailed TCO Review Session		✓	✓
Conceptual Site Designs			✓
Preliminary Construction Cost Estimates			✓
Supplemental Fleet Advisory Call(s) <i>(As-Needed)</i>		✓	✓
Final Report Delivery			
Preparation of Summary Report	✓	✓	✓
Custom Fleet Assessment Report			
Custom TCO (Includes Charger and Rate Recommendation)		✓	✓
Charger Utilization and Load Management		✓	✓
Available Incentives		✓	✓
Fleet Advisory Project Walkthrough Call		✓	✓
Supplemental Fleet Advisory Call(s) <i>(As-Needed)</i>		✓	✓
Project Close-Out Call	✓	✓	✓

- b. Each level provides increasing support, allowing customers to start at any level and advance as needed. Evergy will build on previous work, avoid unnecessary rework, and incorporate the results from tasks already completed by the customer. Evergy will use the first fleet advisory call as the entry point (on-ramp) to the program. During this call, Evergy will:
- Assess program eligibility and suitability based on project scope, required effort, and alignment with program objectives using a standardized scoring

matrix (to be developed) during the first advisory call as an entry point to the program

- Determine the off-ramp based on customer qualifications, completed work at the time of application, and specific needs within the program offering.

c. Rightsizing of Charging Advice

1. Evergy will modify eligibility as follows:

- Level 1: Grid optimization education for all customers.
- Levels 2-3: Public entities and small private entities will qualify for this level of service (includes “rightsizing”).

2. Small private entities’ eligibility criteria are < 500 employees. These eligibility criteria will be based on the Kansas Small Business Profile published by the U.S. Small Business Administration’s Office of Advocacy.⁷

d. Third-Party Advisors

1. Within 60 days following Commission approval, Evergy will collaborate with Staff and CURB to develop a Request for Proposal (“RFP”) template and a process for customers seeking third-party fleet advisory services.

e. Communications Plan

1. Within 90 days following Commission approval, Evergy will develop and present to the intervenors for stakeholder review and collaboration a Communications Plan for the FAS program. The plan will include the following:

- Details on messaging
- Design
- Delivery channels
- Frequency of communications directed at participants for each level
- Key performance indicators

f. Pilot Program with EM&V

1. Evergy will offer the program as a 5-year pilot.

2. Evergy will fulfill the following tasks within the proposed scope and budget:

- Annual report:
 - Marketing and outreach activities completed
 - Number of participants
 - Projected charging loads
 - Budget expenditure
- Final evaluation:
 - Customer surveys to gather process feedback and assess program influence

⁷ The 2023 edition of this document is available at <https://advocacy.sba.gov/wp-content/uploads/2023/11/2023-Small-Business-Economic-Profile-KS.pdf>

- Data collection and benefit-cost analysis with a focus on program impact derived from planned electric vehicles and charging plans
- 3. Evergy will collaborate with Staff and CURB to establish any additional EM&V requirements, if needed, and determine the necessary budget adjustments to accommodate additional scope, if required within 12 months following Commission approval.

II. Residential Managed Charging (“RMC”) Pilot

a. RMC Pilot Parameters

1. Evergy will increase the number of charging days each month from one (1) day to two (2) days as a condition of receiving the program’s monthly participation incentive to achieve the objective of data adequacy.
2. After twelve (12) months of Active Managed Charging data becomes available, the parties agree to consider increasing the required number of charging events if the median charging days are actually less than five (5).

b. Communications Plan

1. Within six months following Commission approval, Evergy will develop, and present to the intervenors for stakeholder review and collaboration, a detailed Communications Plan for the RMC Pilot. The plan will include the following:
 - details on messaging
 - design
 - delivery channels
 - frequency of communication directed at participants in each group (except the control group)
 - key performance indicators

c. EM&V/Research Methodology

1. Evergy will develop a draft EM&V Plan within three (3) months of Commission approval of the RMC Pilot. The EM&V Plan will include the EM&V Methodology Plan, EM&V Methodology Implementation Plan, and Detailed Customer Research Methodology Plan excluding use of pre-pilot focus groups. Evergy will work collaboratively with Staff and interested stakeholders over the following month to refine the EM&V Plan. Evergy, Staff, and interested stakeholders will then jointly file the EM&V plan in this docket.

III. Miscellaneous Terms of General Applicability

- a. Unless otherwise specifically provided for herein, the Signatories agree that the budget and participation parameters proposed in Evergy’s direct filing will not be affected by the terms of this Settlement Agreement.
- b. The Signatories agree that each party has the right to file testimony in support of this Settlement Agreement per the Procedural Schedule established for this docket.

- c. The Signatories waive cross-examination on all testimony filed contemporaneously with or prior to the filing of this Settlement Agreement.
- d. The Signatories stipulate that this Settlement Agreement is a negotiated settlement that fully resolves all matters in this docket and constitutes a fair and reasonable resolution of this docket.

IN WITNESS THEREOF, the Signatories have executed and approved this Settlement Agreement by subscribing their signatures below.

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CERTIFICATE OF SERVICE

25-EKCE-169-TAR

I hereby certify that a copy of the above and foregoing was electronically filed with the Kansas Corporation Commission on February 28, 2025, and that one copy was delivered electronically to all parties on the service list as follows:

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