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 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

DIRECT TESTIMONY

OF

MATT L. ROBBINS

ON BEHALF OF KANSAS GAS SERVICE

A DIVISION OF ONE GAS, INC.

MARCH 14, 2025

DIRECT TESTIMONY

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ON BEHALF OF KANSAS GAS SERVICE

A DIVISION OF ONE GAS, INC.

I. POSITION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Matt L. Robbins. My business address is 7421 W. 129th Street, Overland Park, Kansas 66213.

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

A. I am the Director of Gas Supply for Kansas Gas Service, a division of ONE Gas, Inc. ("KGS" or "Company").

Q. What are your responsibilities in your current position?

A. As Director of Gas Supply, I have primary responsibility for KGS's gas supply operations. My responsibilities include oversight of gas supply planning, forecasting, scheduling, upstream service procurement, upstream contract administration, accounting, gas control operations, and regulatory compliance. Under gas supply planning, I am responsible for the planning and management of KGS's storage contracts and inventory balances.

Q. Please describe your education and professional experience.

A. I have a Master of Business Administration degree with an emphasis in Finance from Oklahoma City University, and a Bachelor of Science degree in Business Administration from Oklahoma State University. I began my employment with Oklahoma Natural Gas ("ONG") in July 1994 as a meter reader. Like KGS,

ONG is a division of ONE Gas, Inc. I completed three years in the Corporate Professional Development Program, where I rotated through all functions of ONG. My experience also includes eight years as an analyst for ONG's Rate and Regulatory Affairs Department and 13 years in a management capacity for ONG's Gas Supply. In 2013, I became the Director of Gas Supply for ONG. In 2018, I began working at KGS as Director of Gas Supply.

Q. Can you briefly describe KGS?

A. KGS is a natural gas public utility operating in the state of Kansas pursuant to certificates of convenience and necessity issued by the Kansas Corporation Commission ("Commission"). KGS is the largest natural gas public utility in Kansas, serving approximately 650,000 customers in over 360 communities. As part of its public utility obligations to its customers, KGS is required to maintain an adequate and reliable supply of natural gas for its retail sales customers.

Q. Have you previously testified before the Commission?

A. Yes.

Q. Was this testimony prepared by you or under your direction?

A. Yes, it was.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to inform the Commission and stakeholders about how KGS's operations might be affected by Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc.'s ("Evergy") proposed Combined Cycle Gas Turbines ("CCGTs"). Like Evergy, KGS must provide

sufficient and efficient service at just and reasonable rates. The Commission should consider how Evergy's generation fleet could impact KGS and other natural gas utilities in meeting their customers' needs. KGS does not oppose Evergy's request. KGS believes natural gas is a vital fuel for the American economy and the State of Kansas. At the same time, KGS believes more coordination and cooperation between natural gas and electric public utilities during extreme weather can help provide customers reliable service. My testimony points out potential bottlenecks and suggests reasonable conditions for the Commission to attach to any predetermination ruling.

Q. Please briefly describe Evergy's Petition.

A. On November 6, 2024, Evergy filed a Petition for Determination of Ratemaking Principles and Treatment with the Commission with respect to its plan to build, among others, two natural gas CCGT electric generation facilities in Reno and Sumner Counties in Kansas. Each CCGT will have a capacity of 710 megawatts (MWs).

Q. Why did KGS intervene in this docket?

A. KGS's Petition for Intervention, filed November 18, 2024, indicated the Company's concern with how increased demand for natural gas supplies and pipeline capacity to meet the needs of electric public utilities would affect KGS's ability to meet its own service obligations. KGS currently utilizes the services of upstream interstate and intrastate pipelines to provide pipeline capacity service and natural gas producers and marketing companies to provide natural gas supplies on those pipelines. Given the finite number of pipelines and

suppliers, Evergy is all but certain to need services from one or more of these same entities. Extreme weather events, like Winter Storm Uri, create a significant demand for natural gas pipeline capacity and supplies. It is important that consideration of adequate upstream services and any reliability coordination efforts take place now as the projects are under consideration, rather than when a significant weather event is impacting Kansas. Intervening in this docket allows KGS to bring these issues before the Commission and allow all stakeholders to have an expanded discussion on serving customers – gas and electric – reliably.

III. CAPACITY NEEDS OF THE CCGT PLANTS AND GAS SUPPLY ISSUES

A. Capacity Needs

Q. Can you please summarize your concerns about pipeline capacity?

A. Yes. Based on publicly available information, KGS believes there are constraints that will limit Evergy's ability to operate its proposed CCGTs. These capacity restrictions could impact how KGS provides service to its customers. To operate the CCGTs, Evergy is all but certain to need firm pipeline capacity. Based on where the plants will be located, there simply may not be enough firm capacity available. To address this concern, KGS proposes Evergy report to the Commission it has secured adequate firm capacity to operate the plants. I describe the reporting condition later in my testimony.

Q. How much pipeline capacity do you believe will be necessary to serve the two CCGT generation plants?

A. At the outset, let me be clear that my estimate is based purely on publicly available information and not on any highly confidential responses to data request provided in this docket. KGS agrees with Evergy on the need to protect highly confidential gas supply information. I estimate the CCGTs will require approximately 222,000 Dekatherms ("Dth") to 240,000 Dth of natural gas to operate continuously for a 24-hour period. According to Evergy Witness Mr. J Kyle Olson, Evergy's proposed CCGT generation units will use the Mitsubishi M501JAC gas turbine.[1] The M501JAC gas turbine's combined cycle performance has a heat rate of approximately 6,500 British Thermal Units ("BTUs") per kilowatt hour ("KWh").[2] The following table illustrates my estimate.

Table 1: Heat Rate to Consumption Estimate

Calculate Daily Megawatt Hours	710 MW per CCGT	x	24 hours	=	17,040 MWh per CCGT
Convert to Kilowatt Hours	17,040 MWh	x	1,000	=	17,040,000 KWh
BTUs needed to generate Kilowatt Hours	17,040,000 KWh	x	6,500 BTUs	=	110,760,000,000 BTUs
Convert BTU to Dekatherms	110,760,000,000 BTUs	/	1,000,000	=	110,760Dth per CCGT

As shown in Table 1, I estimate each CCGT will require 110,760 Dth of natural gas if the turbine is run continuously over a 24-hour period. I assumed the CCGTs would run continuously since Mr. Olson indicates the plants will provide base load energy.[3]

[1] *See* Direct Testimony of J Kyle Olson, Exhibits JKO-6 and JKO-7, Docket No. 25-EKCE-207-PRE (Nov. 6, 2024) (Olson Direct).
[2] *See Jackson Generation Pioneers North America's First M501JAC Gas Turbines,* Oct 1, 2024*, available at https://www.powermag.com/jackson-generation-pioneers-north-americas-first-m501jac-gas-turbines/* (last visited Mar. 14, 2025).
[3] Olson Direct, page 31, line 23 through page 32, line 2.

Q. Are there any other sources of information that could be used to estimate the CCGTs' natural gas consumption?

A. Yes. Public information published by the United States Energy Information Administration ("EIA") indicates that CCGT plants have an average operation heat rate of approximately 7,146 Btu/kWh.[4] Using this heat rate, each CCGT would require approximately 120,000 Dth of natural gas per day, for a combined total of approximately 240,000 Dth of natural gas per day.

Q. Has Evergy studied the availability of firm upstream pipeline capacity in Kansas?

A. Evergy does not provide specific information on the current availability of firm upstream pipeline capacity. However, it appears that Evergy anticipates additional pipeline capacity will be necessary. Mr. Olson indicates that Evergy is working with upstream pipelines on detailed studies. He states:

> Once a project is determined to be feasible and necessary for the new generation to be built, the parties would then execute a precedent agreement that would allow the pipelines to begin developing the infrastructure. . .[5]

Q. Can you briefly explain natural gas transportation service?

A. Generally, upstream pipelines provide "firm" and "interruptible" transportation service. Firm pipeline transportation service is typically used by customers who need a reliable and uninterrupted supply of natural gas, such as residential heating, industrial processes, and power generation plants that operate continuously. Customers who have firm service pay a fixed reservation (or

[4] https://www.eia.gov/todayinenergy/detail.php?id=52158
[5] Olson Direct, page 32.

demand) charge for the amount of capacity they need, as well as a volumetric charge based on how much natural gas they ship. On the other hand, interruptible pipeline transportation service is often used by customers who have more flexibility in their gas usage, such as industrial users with alternative fuel options or businesses that can adjust their operations based on natural gas availability. This service is often available at a reduced cost – customers only pay a volumetric charged based on the amount of natural gas shipped since they are not "reserving" capacity on a pipeline. However, these customers can be interrupted to serve firm customers during periods of high demand.

Q. What type of pipeline capacity does KGS contract for?

A. KGS contracts for firm pipeline capacity. KGS needs to provide reliable natural gas service to its customers during high periods of demand and cannot be in a position where service could be interrupted.

Q. How does KGS meet its service obligations?

A. KGS uses the transportation service of twelve (12) pipelines (both interstate and intrastate). The Company contracts with transportation providers for firm capacity at the highest priority and in sufficient quantities to meet the highest demand on a peak day. The contracts KGS seeks for the benefit of its customers grant the Company with the right to move gas on the pipelines directly to KGS's city gates.

Q. Can you provide more detail concerning natural gas transportation providers and services in Kansas?

A. Yes. One of the largest providers of transportation services to Kansas is Southern Star Central Gas Pipeline, Inc. ("SSC"). A system map of SSC is attached as Exhibit MLR-1. SSC's current published daily transportation capacity is 2.4 Bcf (2,400,000 Dth per day).[6]

Q. Does KGS use SSC to meet its customers' needs?

A. Yes. KGS relies heavily upon SSC to provide firm transportation service. SSC provides approximately 70% of KGS's firm transportation service. To put that in context, KGS has reserved approximately 25% of SSC's total capacity. KGS currently has contracted to ship approximately 630,000 Dth per day on SSC.

Q. Will Evergy need to utilize upstream services from SSC to operate its proposed CCGTs?

A. I believe so. Based on information from the National Pipeline Mapping System, SSC is the closest interstate pipeline to both proposed CCGTs. In full candor, and as noted in Evergy's Motion to Modify Protective Order filed January 30, 2025, KGS has submitted a bid to develop pipeline infrastructure needed to serve one of the plants. However, Evergy will likely need access to interstate gas markets to obtain the volumes necessary to operate the plants. If that ends up being SSC, then it is important to consider SSC's ability to serve this additional demand.

Q. Do you have any concerns about capacity on SSC?

[6] *See* Southern Star 101 presentation, p. 3, *available at* https://csimain.southernstar.com/EBBPostingDocs/ReportReferenceList/117226.pdf (last visited Mar. 13, 2025); *See also* Southern Star – About Us, *available at* https://southernstar.com/about-us/ (last visited Mar. 13, 2025).

A. Yes. Attached as Exhibit MLR – 2 is a copy of a public slide presented by SSC at a recent customer meeting. This slide shows that SSC is 100% subscribed (has no available firm pipeline capacity), as of February 1, 2025, in the market area and has 128,000 Dth per day of firm pipeline capacity available in the production area on its Kansas-Hugoton line. Evergy's proposed CCGTs are located in SSC's production area.

Q. Why is this a concern?

A. As shown above, based on publicly available information and assumptions, KGS estimates the proposed CCGTs will consume approximately 240,000 Dth per day. This appears to exceed the current available capacity in SSC's production area by nearly 75%.

Q. Is SSC attempting to add capacity?

A. Yes. On November 18, 2024, SSC filed an application at the Federal Energy Regulatory Commission seeking a Certificate of Public Convenience and Necessity to construct, install, operate, and maintain a new compressor station in Osage County, Oklahoma (the "Cedar Vale Compressor"). This project would add approximately 98,000 Dth per day of incremental firm capacity for transportation in SSC's Market Area and approximately 35,000 Dth per day of incremental firm capacity for transportation in SSC's Production Area. According to SSC, "This added compression will assist shippers in moving gas to the growing markets in and around Springfield, Joplin, Kansas City, and Topeka in Missouri and Kansas."[7] However, since the proposed CCGTs are

[7] Abbreviated Application for a Certificate of Public Convenience and Necessity, FERC Docket No. CP25-19, p. 1 (Nov 18, 2024).

not in these markets its unclear whether the capacity added by the Cedar Vale Compressor could support Evergy's proposed CCGTs. Southern Star also recently conducted a binding open season for capacity on its Canadian Blackwell line segment in Oklahoma, but it is unclear whether this capacity could be used to support the proposed CCGTs. Finally, Southern Star has announced a nonbinding open season to add approximately 600,000 Dth per day of capacity at five interconnects across their system.

Q. Cheyenne Plains Gas Pipeline ("Cheyenne Plains") is also a larger provider of interstate natural gas transportation services to Kansas. Could Evergy rely on Cheyenne Plains to serve its plants?

A. Possibly. Cheyenne Plains has a daily capacity of 800,000 Dth. As of January 1, 2025, Cheyenne Plains had 167,252 Dth per day capacity available in Kansas.[8] However, given the location of the proposed CCGTs, it's likely any volumes transported through Cheyenne Plains would still need to ship through SSC or KGS (both SSC and KGS have interconnections with Cheyenne Plains).

Q. How do your pipeline capacity concerns impact the proposed CCGTs?

A. My concerns simply highlight the need to confirm Evergy has secured sufficient capacity necessary to operate the plants before they are scheduled to come online.

Q. If Evergy secures firm capacity on upstream pipelines to operate its CCGTs, does that fully address KGS's concern?

[8] *See* Cheyenne Plains Index of Customers, 4th Quarter, 2024, *available at* https://pipeline2.kindermorgan.com/IndexOfCust/IOC.aspx?code=CP (last visited Mar. 14, 2025).

A. No. Larger events that impact the region's natural gas resources pose additional challenges the Commission should be mindful of.

B. Natural Gas Supply Issues

Q. Can you briefly describe KGS's natural gas supply concerns?

A. Yes. Extreme weather events can disrupt natural gas supplies. In those circumstances, multiple parties (suppliers, marketers, and consumers) may suddenly find their gas supply plans disrupted with only a limited number of alternatives available. Take, for example, Winter Storm Uri. During the storm, natural gas suppliers were impacted by wellhead freeze offs and processing plant performance issues. As I testified in Docket No. 21-KGSG-332-GIG:

> Throughout the storm, suppliers of both next-day and same-day gas supplies were telling the Company's Gas Supply manager they would do their best to provide the gas they quoted to KGS, but they were also giving oral force majeure notices over the phone at the time KGS was attempting to secure the needed gas. During this time, upstream pipeline conditions were changing and deteriorating. KGS experienced pressure issues at a few city gates, and for a period of time was concerned about losing the Jayhawk processing plant located in Southwest Kansas and owned and operated by Scout Energy Partners which drastically reduced its ability to supply gas into Southern Star, who supplies a majority of KGS's customers. Gas Supply had to quickly work with upstream partners to purchase additional gas to cover expected supply reductions.

Winter Storm Uri spurred the Governor of Kansas to declare a State of Emergency and led to 13 days of below freezing temperatures. All upstream pipelines with which KGS contracts for transportation capacity and storage services issued Operational Flow Orders ("OFOs") due to the shortage of natural gas supplies and KGS followed suit. Additionally, during this time KGS requested that large commercial and industrial customers curtail usage to

assist the Company in ensuring service to human needs customers and provided tips to residential customers to conserve energy.

Q. How could Evergy's CCGTs impact KGS in another Winter Storm Uri?

A. The additional load could make it difficult for KGS and others to secure enough natural gas on a peak day to meet their requirements. In most situations, adequate natural gas supplies are available on the upstream pipelines that provide service to Kansas. However, the availability and reliability of those gas supplies can become an issue during periods of extreme weather conditions such as were experienced in Winter Storm Uri.

Q. Was this a key issue during Winter Storm Uri?

A. Yes. Recognizing the Jayhawk Plant was experiencing performance issues, KGS had to quickly secure gas from marketers who utilized other pipelines to cover expected supply reductions. For example, if KGS believes its supply of gas at one location may be curtailed, then the Company needs to find a way to fill it from somewhere else.

Q. How does that impact Evergy's proposed CCGTs?

A. In a large, extreme weather event, KGS, Evergy, and others may experience widespread supply disruptions. There simply may not be enough natural gas supplies or pipeline capacity on alternative paths available for all parties. Parties can have ample capacity to meet their needs reserved on a pipeline, but if the supplies that are able to be delivered into that pipeline are interrupted then the shortfall needs to be made up elsewhere.

Q. Does KGS have experience with how power plant demand can impact its system during extreme weather?

A. Yes. Electric utilities also faced challenges during Winter Storm Uri. In attempting to respond to needs of the Southwest Power Pool ("SPP") and electricity customers, the electric utilities posed challenges for KGS. Specifically, KGS was concerned that Evergy's McPherson and Hutchinson Energy Center natural gas-fired power plants, which KGS serves directly off of its transmission system, would be dispatched simultaneously without notice intraday by the SPP. Essentially, KGS was concerned Evergy would not be able to find adequate intraday natural gas supplies to cover their combined power plant loads forcing KGS to cover their deficiency. KGS experienced this just prior to the coldest days of Winter Storm Uri observing an unanticipated combined flow rate of approximately 80,000 Dth per day to Evergy's power plants.

Q. How did this impact KGS?

A. KGS nearly lost service to the northeast end of its transmission system which includes the towns of Seneca and Silver Lake because the supplies for the sudden increase in usage had not been nominated and delivered into KGS's system.

Q. When natural gas service to customers is lost, how difficult is it for KGS to restore service?

A. A natural gas outage is a significant event that can impact customers for hours or days. Essentially, service to each customer in the impacted area has to be

shut off. Once this has occurred the system can be purged and gas reintroduced. As a final step, KGS must go door-to-door to reinstate service and perform required safety checks. If service is lost during a major weather event, customers could be without service at the same time they are experiencing life threatening temperatures. Adding to the concern is the safety of our employees, who would need to venture into these harsh conditions to begin the restoration process. And while they are restoring service, they would be unavailable to respond to emergent situations elsewhere.

Q. What actions did KGS take as a result of Evergy's unexpected usage?

A. KGS determined it was necessary to impose a customer-specific Operational Flow Order ("OFO") which limited Evergy's combined flow rate to 30,000 Dth per day, provided that Evergy could secure adequate daily gas supplies to cover their combined power plant load. KGS also requested that Evergy engage in more frequent communication about impending usage.

Q. Did Evergy adhere to KGS's customer-specific OFO?

A. Yes. Evergy determined it would utilize an alternative fuel during Winter Storm Uri to operate its plants.

Q. Has communication with electric utilities improved since Winter Storm Uri?

A. Yes. However, with the proposed addition of the CCGTs, further action by the Commission is required. The main point of my testimony is to illustrate that natural gas infrastructure and markets impact how electric generation units can

operate, and the operation of electric generation units can impact natural gas systems.

IV. CONDITIONS ON APPROVAL

Q. Should the Commission place some conditions on approval of the CCGT plants?

A. Yes. KGS believes the Commission should place two conditions on its approval of Evergy's proposed CCGT plants. First, the Commission should require Evergy to report it has secured adequate upstream pipeline capacity to operate the plants in a manner that will not interfere with KGS's operations. Second the Commission should require Evergy and KGS to enter into a coordination agreement prior to the plants coming online.

Q. Please describe your proposed reporting condition.

A. The Commission should require Evergy to file in this docket a report showing that:

- adequate upstream pipeline transportation capacity to natural gas supply basins has been identified; and
- Evergy has contracted for this pipeline capacity.

Importantly, this report would not contain information on Evergy's agreements for the natural gas supplies themselves. Evergy would not, and should not, be required to publicly disclose its contracts or agreements for natural gas supplies, prices, or the volumes delivered by any particular supplier or marketer. KGS believes natural gas pricing information is highly confidential. Contracted pipeline capacity, however, is public information. The report should

be reviewed and approved by the Commission prior to the CCGTs being placed in service, with all parties having the ability to weigh in on the report before it is approved by the Commission.

Q. Please describe your proposed coordination condition.

A. KGS requests that the Commission condition its approval of the CCGTs on requiring Evergy and KGS to enter into a coordination agreement prior to the CCGTs being placed in service. The coordination agreement shall address communication, preparation and readiness measures to be taken by Evergy and KGS with respect to mutual natural gas pipeline capacity and gas supply issues that may arise due to extreme weather and other extraordinary events. The overall goal of the agreement will be to maintain and improve the reliability of the gas and electric energy systems used to provide service to Kansas customers.

VII. CONCLUSION

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does.

VERIFICATION

STATE OF KANSAS)
) ss.
COUNTY OF JOHNSON)

Matthew L. Robbins, being duly sworn upon his oath, deposes and states that he is the Director, Gas Supply for Kansas Gas Service, a Division of ONE Gas, Inc.; that he has read and is familiar with the foregoing Direct Testimony filed herewith; and that the statements made therein are true to the best of his knowledge, information, and belief.

Matthew L. Robbins

Subscribed and sworn to before me this 13 day of March 2025.

NOTARY PUBLIC

STEPHANIE FLEMING
My Appointment Expires
June 5, 2026

My appointment Expires:

6/5/2026

Exhibit MLR-1

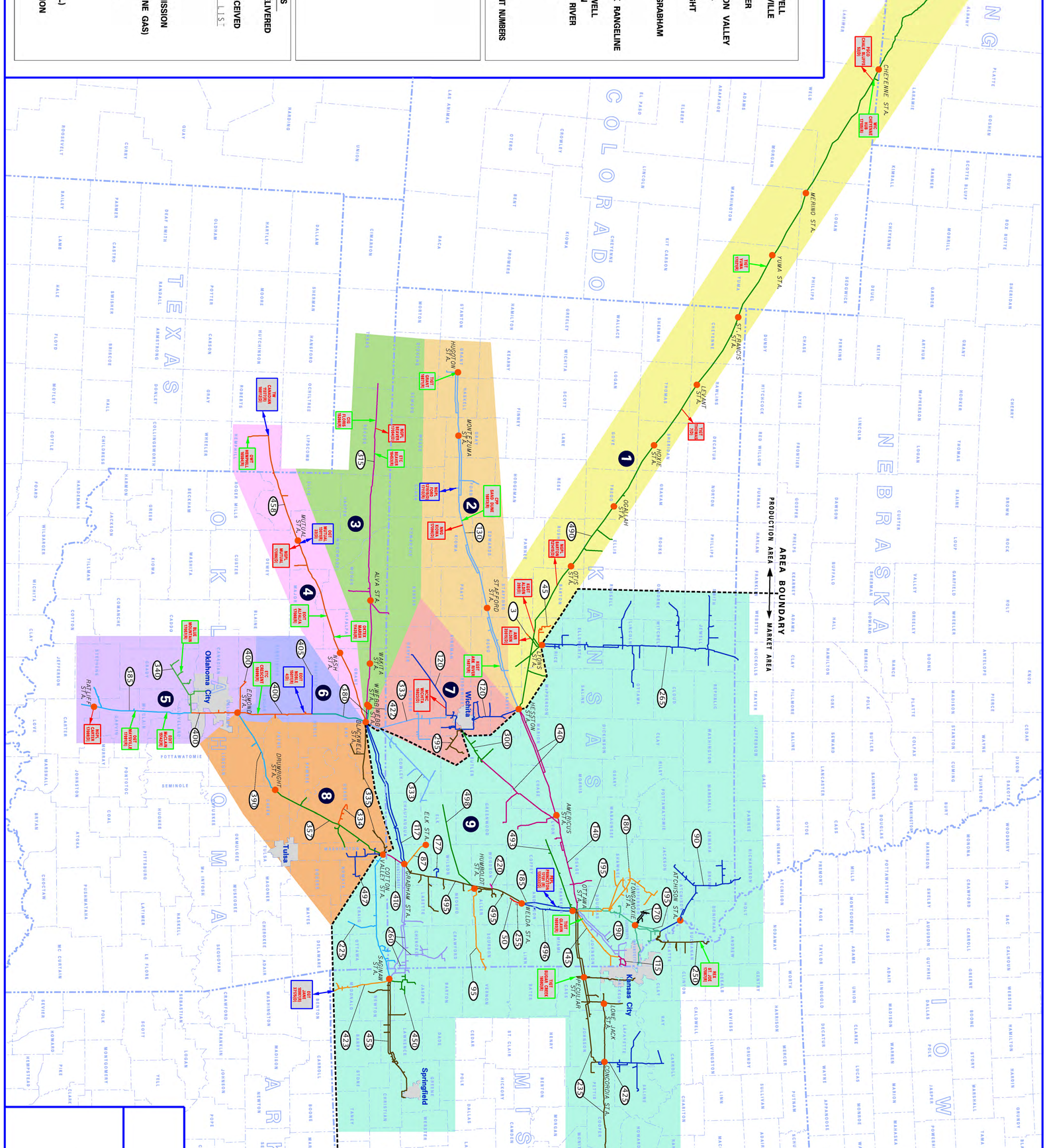
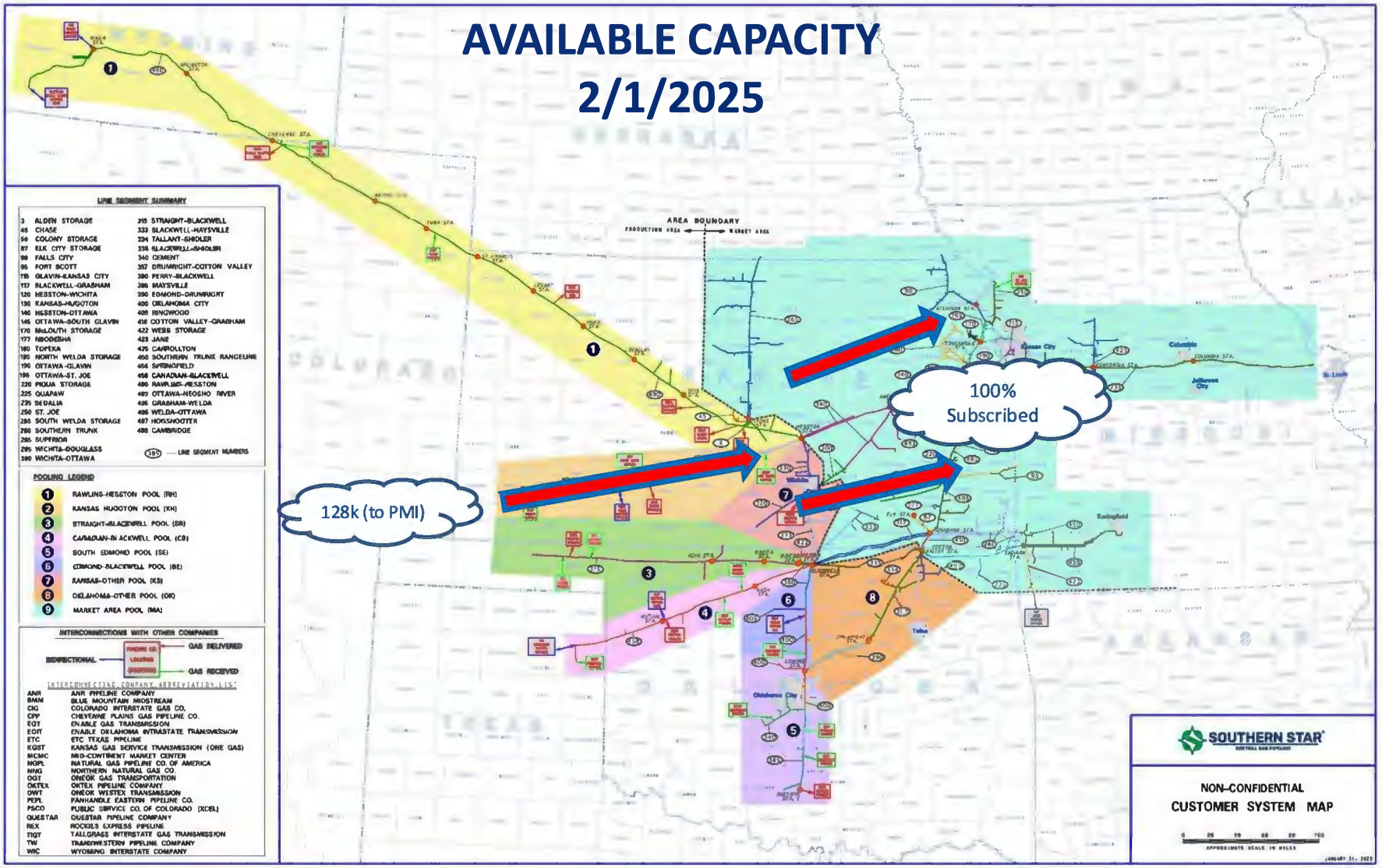


Exhibit MLR-2

AVAILABLE CAPACITY
2/1/2025



CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing testimony was sent via electronic mail this 14th day of March, 2025, addressed to:

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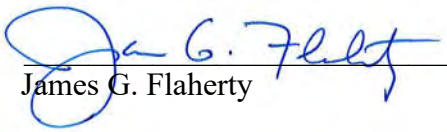

James G. Flaherty