

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

In the Matter of the Joint Application of Evergy)
Kansas Central, Inc. Evergy Kansas South, Inc.)
and Evergy Metro, Inc. for Approval to Make) Docket 23-EKCE-775-RTS
Certain Changes in their Charges for Electric)
Service)

AMENDMENT TO
MOTION OF SCRAP MANAGEMENT INDUSTRIES,
D/B/A MIDWEST SCRAP MANAGEMENT, INC.,
(“MSM”) FOR AN EXTENSION OF TIME TO
RESPOND TO THE JOINT MOTION

COMES NOW the Petitioner for Intervention, Scrap Management Industries, D/B/A
Midwest Scrap Management, Inc., (“MSM”) and states to the State Corporation Commission of
the State of Kansas (“Commission” or “KCC”) as follows:

1. MSM reiterates as fully stated herein, its Motion filed on April 10, 2024.
2. MSM has been advised that the Staff of the Commission and the Department of
Defense do not have objection to the extension of time requested herein.

Respectfully submitted,

/s/ James P. Zakoura
James P. Zakoura, KS 07644
Daniel J. Buller, KS 25002
Sarah C. Otto, KS 27954
FOULSTON SIEFKIN LLP
7500 College Blvd., Suite 1400
Overland Park, KS 66210-4041
Telephone: 913-498-2100
Facsimile: 913-498-2101
Email: jzakoura@foulston.com
dbuller@foulston.com
sotto@foulston.com

Attorneys for Midwest Scrap Management, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of April 2024, the foregoing was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to all parties on the service list as follows:

JOSEPH R. ASTRAB, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
j.astrab@curb.kansas.gov

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
t.love@curb.kansas.gov

DAVID W. NICKEL, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.nickel@curb.kansas.gov

SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
s.rabb@curb.kansas.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.smith@curb.kansas.gov

CATHRYN J. DINGES, SR. DIRECTOR & REGULATORY AFFAIRS COUNSEL
EVERGY KANSAS CENTRAL, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
cathy.dinges@evergy.com

DARRIN R. IVES, V.P. REGULATORY AFFAIRS
EVERGY METRO, INC. D/B/A EVERGY KANSAS METRO
ONE KANSAS CITY PLACE
1200 MAIN ST., 19TH FLOOR
KANSAS CITY, MO 64105
darrin.ives@evergy.com

RONALD A. KLOTE, DIRECTOR, REGULATORY AFFAIRS
EVERGY METRO, INC. D/B/A EVERGY KANSAS METRO
ONE KANSAS CITY PLACE
1200 MAIN ST., 19TH FLOOR
KANSAS CITY, MO 64105
ronald.klote@evergy.com

LESLIE WINES, SR EXECUTIVE ADMIN
ASSISTANT
EVERGY METRO, INC. D/B/A EVERGY
KANSAS METRO
ONE KANSAS CITY PLACE
1200 MAIN ST., 19TH FLOOR
KANSAS CITY, MO 64105
leslie.wines@evergy.com

BRIAN G. FEDOTIN, GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
b.fedotin@kcc.ks.gov

DEREK S. CASEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N. ROCK ROAD, SUITE 300
WICHITA, KS 67226
dscasey@twgfirm.com

AHSAN LATIF, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
a.latif@kcc.ks.gov

CARLY MASENTHIN, LITIGATION
COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
c.masenthin@kcc.ks.gov

VALERIE SMITH, ADMINISTRATIVE
ASSISTANT
MORRIS LAING EVANS BROCK &
KENNEDY
800 SW JACKSON, SUITE 1310
TOPEKA, KS 66612-1216
vsmith@morrislaing.com

ABIGAIL EMERY, PARALEGAL AND
GRANT SPECIALIST
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
a.emery@kcc.ks.gov

JUSTIN GRADY
CHIEF OF REVENUE REQUIREMENTS, COST
OF SERVICE & FINANCE
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
j.grady@kcc.ks.gov

ANDRIA JACKSON
DEPUTY CHIEF OF REVENUE REQ., COST OF
SERVICE & FINANCE
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
a.finger@kcc.ks.gov

KRISTINA LUKE-FRY
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
k.luke-fry@kcc.ks.gov

GLENDA CAFER, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY
800 SW JACKSON, STE 1310
TOPEKA, KS 66612
gcafer@morrislaing.com

TREVOR WOHLFORD, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY
800 SW JACKSON, SUITE 1310
TOPEKA, KS 66612-1216
twohlford@morrislaing.com

RITA LOWE, PARALEGAL
MORRIS LAING EVANS BROCK &
KENNEDY, CHTD
300 N MEAD, STE 200
WICHITA, KS 67202-2745
rlowe@morrislaing.com

DAVID BANKS, CEM, CEP
FLINT HILLS ENERGY CONSULTANT
117 S PARKRIDGE
WICHITA, KS 67209
david@fheconsultants.net

SARAH C. OTTO
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
sotto@foulston.com

CONNOR A THOMPSON, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
cthompson@foulston.com

ROBERT HORTON
TITUS LAW FIRM, LLC
7304 W. 130th ST.
SUITE 190
OVERLAND PARK, KS 66213
trey@tituslawkc.com

KACEY S MAYES, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
ksmayes@twgfirm.com

DAN LAWRENCE, GENERAL COUNSEL -
USD 259
UNIFIED SCHOOL DISTRICT 259
903 S EDMOOR RM 113
WICHITA, KS 67218
dlawrence@usd259.net

WILL B. WOHLFORD, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY,
CHTD
300 N MEAD, STE 200
WICHITA, KS 67202-2745
wwohlford@morrislaing.com

DANIEL J. BULLER, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
dbuller@foulston.com

LEE M SMITHYMAN, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
lsmithyman@foulston.com

JAMES P ZAKOURA, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
jzakoura@foulston.com

ROBERT R. TITUS
TITUS LAW FIRM, LLC
7304 W. 130th ST.
SUITE 190
OVERLAND PARK, KS 66213
rob@tituslawkc.com

TIMOTHY E. MCKEE, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
temckee@twgfirm.com

JAMES G. FLAHERTY
ANDERSON & BYRD, LLP
216 S. HICKORY, P.O. BOX 17
OTTAWA, KS 66067
jflaherty@andersonbyrd.com

SHELLY M BASS, SENIOR ATTORNEY
ATMOS ENERGY CORPORATION
5430 LBJ FREEWAY
1800 THREE LINCOLN CENTRE
DALLAS, TX 75240
shelly.bass@atmosenergy.com

ASHOK GUPTA, EXPERT
NATIONAL RESOURCES DEFENSE
COUNCIL
20 N WACKER DRIVE SUITE 1600
CHICAGO, IL 60606
agupta@nrdc.org

JASON T GRAY, ATTORNEY
DUNCAN & ALLEN
1730 RHODE ISLAND AVE., NW
SUITE 700
WASHINGTON, DC 20036
jtg@duncanallen.com

JARED R. JEVONS, ATTORNEY
POL SINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
jjevons@polsinelli.com

KEVIN K. LACHANCE, CONTRACT LAW
ATTORNEY
UNITED STATES DEPARTMENT OF
DEFENSE
ADMIN & CIVIL LAW DIVISION
OFFICE OF STAFF JUDGE ADVOCATE
FORT RILEY, KS 66442
kevin.k.lachance.civ@army.mil

TIM OPITZ
OPITZ LAW FIRM, LLC
308 E. HIGH STREET, SUITE B101
JEFFERSON CITY, MO 65101
tim.opitz@opitzlawfirm.com

ROBERT E. VINCENT, MANAGING
ATTORNEY
KANSAS GAS SERVICE, A DIVISION OF ONE
GAS, INC.
7421 W. 129TH STREET
OVERLAND PARK, KS 66213
robert.vincent@onegas.com

MELISSA M. BUHRIG, EXEC. VICE
PRESIDENT, GEN. COUNSEL & SECRETARY
CVR ENERGY, INC.
2277 Plaza Dr., Ste. 500
Sugar Land, TX 77479
mmbuhrig@CVREnergy.com

FRANK A. CARO, ATTORNEY
POL SINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
fcaro@polsinelli.com

JOHN J. MCNUTT, GENERAL ATTORNEY
U.S. ARMY LEGAL SERVICES AGENCY
REGULATORY LAW OFFICE
9275 GUNSTON RD., STE. 1300
FORT BELVOIR, VA 22060-5546
john.j.mcnutt.civ@army.mil

C. EDWARD WATSON, ATTORNEY
FOULSTON SIEFKIN LLP
1551 N. WATERFRONT PARKWAY, SUITE 100
WICHITA, KS 6726
cewatson@foulston.com

JOHN B. COFFMAN
ATTORNEY AT LAW
871 Tuxedo Blvd.
St. Louis, MO 63119
john@johncoffman.net

TIMOTHY J. LAUGHLIN
SCHOONOVER & MORIARTY, LLC
130 N. CHERRY ST., SUITE 300
OLATHE, KS 66061
tlaughlin@schoonoverlawfirm.com

DOROTHY BARNETT
CLIMATE & ENERGY PROJECT
PO BOX 1858
HUTCHINSON, KS 67504-1858
barnett@climateandenergy.org

PAUL T. DAVIS
PAUL DAVIS LAW FIRM, LLC
932 MASSACHUSETTS STREET, SUITE 301
LAWRENCE, KANSAS 66044
pdavis@pauldavislawfirm.com

/s/ James P. Zakoura
James P. Zakoura, KS 07644
Daniel J. Buller, KS 25002
Sarah C. Otto, KS 27954
Email: jzakoura@foulston.com
dbuller@foulston.com
sotto@foulston.com

Attorneys for Midwest Scrap Management, Inc.