

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

In the Matter of the Application of Evergy Kansas)
Metro, Inc., Evergy Kansas South, Inc., and) Docket No. 25-EKME-315-TAR
Evergy Kansas Central, Inc. for Approval of Large)
Load Service Rate Plan and Associated Tariffs.)

**PETITION FOR INTERVENTION OF SPIRIT AEROSYSTEMS, INC
AND OBJECTION TO PROPOSED PROCEDURAL SCHEDULE OF EVERGY**

COMES NOW the following Intervenor, Spirit AeroSystems, Inc. (“Spirit”), and states to the State Corporation Commission of the State of Kansas (“Commission” or “KCC”) as follows:

1. Evergy Kansas Metro, Inc., Evergy Kansas South, Inc., and Evergy Central, Inc. (“Evergy”) have filed in this Docket on February 11, 2025, an Application entitled: “Application of Evergy Kansas Metro, Inc., Evergy Kansas South, Inc., and Evergy Central, Inc. for Approval of Large Load Service Rate Plan and Associated Tariffs.”

2. In this Docket, Evergy further stated as follows: “Central to the LLPS Rate Plan is a new, tariffed rate offering, Schedule LLPS, which sets forth the tariffed terms and conditions that will apply to customers over 100 MW seeking to interconnect to Evergy’s Kansas system. In addition to Schedule LLPS, the LLPS Rate Plan includes a selection of new and existing tariffed offerings, which are largely designed to expand the Company’s clean and renewable energy offerings that will be available to Schedule LLPS customers, while ensuring that customers who elect to participate pay their fair share.”

3. This entitled Docket will involve both new tariff offerings and consideration of cost assignment for LLPS Rate Plan customers. Therefore, this Docket will directly affect the

retail electric rates of all retail ratepayers currently on the electric systems of Evergy Kansas Metro, Evergy Kansas South, Inc., and Evergy Kansas Central, Inc.

Intervenor Seeking Intervention Herein

Spirit AeroSystems, Inc. (“Spirit”)

4. Spirit is a retail ratepayer and is a direct customer of Evergy Kansas Central. As a direct customer of Evergy Kansas Central, Spirit has a direct financial interest in this KCC proceeding.

5. The retail electric rates of Spirit may be affected by a Commission Order in this KCC Docket.

6. Spirit will participate in this Docket through the Kansas Industrial Consumers Group, Inc. (KIC) On February 13, 2025, KIC filed a Petition for Intervention in this Docket.

7. K.A.R. 82-1-225, provides in pertinent part:

82-1-225. Intervention. This regulation shall apply to both KAPA and non-KAPA proceedings. (a) The presiding officer shall grant a petition for intervention if the following conditions are met:

- (1) The petition is submitted in writing to the presiding officer, with copies mailed to all parties named in the presiding officer's notice of the hearing, at least three days before the hearing.
- (2) The petition states facts demonstrating that the petitioner's legal rights, duties, privileges, immunities, or other legal interests may be substantially affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law.

8. The KCC, in applying K.A.R. 82-1-225 has stated:

The Commission shall grant Intervention if the Petition:

“(1) is submitted in writing to the presiding officer, with service on all parties named in the Commission’s notice of hearing, at least 3 business days before the hearing; (2) states facts demonstrating the petitioner’s legal rights, duties, privileges, immunities, or other legal interests may be substantially affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law; and (3) the interests of justice and the orderly and prompt conduct of the

proceedings will not be impaired by allowing the intervention. The Commission has discretion to grant intervention at any time where intervention is in the interests of justice and will not impair the orderly and prompt conduct of proceedings. At any time during a proceeding, the Commission may impose limitations on the intervenor's participation, which may include: (1) limiting an intervenor's participation to designated issues in which the intervenor has a particular interest demonstrated by the petition; (2) limiting the intervenor's discovery, cross-examination, and other procedures; and (3) requiring intervenors to consolidate their participation in the proceedings." ORDER GRANTING INTERVENTIONS, KCC Docket No. 22-EKME-254-TAR, March 31, 2022, at para. 8.

9. Spirit has stated facts herein that support its participation as an Intervenor herein in that it has direct financial interests in the Commission's Order in this Docket.

Objection to the Proposed Procedural Schedule of Evergy

10. In its Application in this Docket, Evergy proposes an accelerated procedural schedule of 4 months. Spirit objects to the accelerated procedural schedule and recommends that the Commission adopt a more traditional procedural schedule of 6 to 8 months, that includes filing of KCC Staff, CURB, and Intervenor's direct prefiled testimony, as well as responsive testimony to be filed by Evergy, KCC Staff, CURB, and Intervenor's. In addition, the Commission should permit reasonable discovery related to the proposed tariff.

CONCLUSION

WHEREFORE, Spirit respectfully requests that the Commission grant Spirit intervention in this KCC Docket, and that the Commission reject the proposed procedural schedule of Evergy in this Docket, and order a procedural schedule that includes pleadings and discovery as set forth in paragraph 9 above, in order for the Commission to have before it appropriate evidence for a Commission decision in this Docket.

Respectfully submitted,

/s/ James P. Zakoura

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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF JOHNSON)

James P. Zakoura, being duly sworn upon his oath, deposes and states that he is the Attorney for the Spirit AeroSystems, Inc., that he has read and is familiar with the foregoing *Petition for Intervention of Spirit AeroSystems and Objection to Proposed Procedural Schedule of Eveyry*, and that the statements therein are true to the best of his knowledge, information, and belief.



James P. Zakoura

SUBSCRIBED AND SWORN to before me this 17th day of February 2025.



Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of February 2025, the above and 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:

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