

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

---

**DIRECT TESTIMONY OF**

**JOHN ROLFE**

**ON BEHALF OF THE WICHITA REGIONAL CHAMBER**

---

**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. 66-117.**

**Docket No. 25-EKCE-207-PRE**

**March 14, 2025**

**I. Introduction**

**Q. Please state your name and business address.**

A. My name is John Rolfe. My business address is 350 W. Douglas Avenue, Wichita, Kansas 67202.

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

A. I am currently employed, as the President and CEO of the Wichita Regional Chamber of Commerce, Inc., a Kansas not-for-profit corporation (“Wichita Regional Chamber”).

**Q. On whose behalf are you testifying?**

A. I am testifying on behalf of the Wichita Regional Chamber.

**Q. Have you previously filed testimony in other proceedings before the Commission?**

A. No.

**Q. Are you sponsoring any exhibits?**

A. No.

**Q. What are your responsibilities as President and CEO of the Wichita Regional Chamber?**

A. As President and CEO of the Wichita Regional Chamber, my primary responsibility is to promote and foster a prosperous business community in the Wichita region. I focus on and am concerned about issues such as: (1) supporting member growth and success; (2) participating in governmental relations and advocacy for business in the Wichita region; (3) championing important strategic initiatives; (4) developing relationships and coordinating with other professional organizations in the community such as Wichita Manufacturers Association and Leadership Wichita, among others; and (5) maintaining the overall health of the Wichita Regional Chamber as an organization. My work includes having a knowledge of public policy issues impacting business growth and sustainability, such as the ones raised in this docket. The decisions in this docket will impact the

businesses of our community. In short, I am focused on making sure that the business and economic environment in our community is sustainable and conducive to both short-term and long-term growth.

**Q. Please describe your education, experience, and employment history.**

A. I am a proud graduate of Wichita State University holding a bachelor's degree in business administration. Prior to joining the Wichita Regional Chamber, I served as the Chief Business Officer at the Kansas Leadership Center (KLC), where I directed all business operations, business development and community outreach efforts. Before joining KLC, I served as Chief Operating Officer for Houston First Corporation in Houston, Texas. I was also the former CEO and President of the Go Wichita Convention & Visitors Bureau (now Visit Wichita) and have also served as Deputy Secretary of the Kansas Department of Commerce.

**Q. What is the purpose of your testimony?**

A. The purpose of my testimony is to express concerns of the Wichita Regional Chamber in regard to the potential impact on rates associated with Evergy's request to construct two new gas powered generation facilities and one solar facility. To be sure, Evergy's newly proposed generation facilities will put upward pressures on rates. And this is problematic.

As I will demonstrate, the cost of electricity is a critical factor in positioning the larger Wichita regional economy as a competitive alternative in retaining and attracting businesses. In light of this, the inevitable rate increases will most certainly be detrimental to the region's economic development and employment opportunities.

It is important for the Commission, therefore, to stay true to proven economic principles underlying rate making decisions that require careful examination of two issues: *Who are the customers causing the expansion of generation facilities and who will benefit?*

To the extent that the expansion of generation facilities is *not* caused by Evergy Kansas Central’s (“EKC”) customers – and I will show that they are not – it would be inappropriate to have them shoulder the increased burden. That is, it would be unfair and at odds with principles of economic efficiency.

Ultimately, the Wichita Regional Chamber requests that the Commission uses sound ratemaking principles to ensure that the Wichita region is not unfairly and inappropriately placed at an even greater disadvantage (as it relates to the cost of energy) as compared to competing MSAs, such as Oklahoma City.

## **II. Wichita Regional Chamber’s Intervention in Docket No. 25-EKCE-207-PRE**

### **Q. What is the Wichita Regional Chamber?**

A. The Wichita Regional Chamber represents more than 1,200 businesses, along with their respective employees in the Wichita region. These businesses are, for the most part, located in the electric service territory of EKC.

### **Q. What is your understanding of this docket?**

A. On November 6, 2024, Evergy<sup>1</sup> filed a Petition for Predetermination of Ratemaking Principles and Treatment for what Evergy has denominated as: (a) the “Viola Plant” – a 710 MW natural gas plant; (b) the “McNew Plant” – a 710 MW natural gas generation plant; and (c) the “Kansas Sky” – a 200 MWDC 159 MWAC solar generation facility. If approved and ordered by the Commission, the rate impact on EKC’s retail customers is estimated to be a 9.3% retail rate increase. Both natural gas plants are expected to result in an increase of 4.3% each (8.6% total), and the solar facility will result in an increase of

---

<sup>1</sup> Evergy is defined herein to include Evergy Kansas Central, Inc. (EKC), Evergy Kansas South, Inc. (EKS), Evergy Metro (EM), and Evergy Kansas Metro (EKM).

0.7%.<sup>2</sup> Although these percentages have not yet been broken down by subclass, all of Wichita Regional Chamber's members, which include small and medium-sized businesses will likely be impacted. The Wichita Regional Chamber requests the Commission ensure that the final allocation of the costs for these proposed plants, to the extent that the Commission decides to authorize their construction, considers the burdens already faced by small and medium-sized businesses in our community and all over Kansas.

**Q. Why did the Wichita Regional Chamber seek intervention in this docket?**

A. The business community throughout the Wichita region – as well as every citizen of the Wichita regional community – will benefit from good energy policy related to the issues of reliable, continuous electric service, and competitive retail electric rates. Good energy policy is the purported goal of this docket. The Wichita Regional Chamber focuses on the economic growth of the region. The cost of energy is directly related to economic growth.<sup>3</sup> The Wichita Regional Chamber has existed in some form since 1917 and throughout this entire period the Wichita Regional Chamber has consistently advocated for the advancement and health of this unique business community where manufacturing, agriculture, and the service industry come together. All of these industries require affordable energy to be successful. We believe that our membership will be “substantially affected by this proceeding,” and intervention was appropriate under applicable Kansas law for the Wichita Regional Chamber. Evergy has stated in its public testimony<sup>4</sup> and during the March 5, 2025 public hearing that its preferred resource plan is designed to

---

<sup>2</sup> Direct Testimony of Darrin Ives filed on Nov. 6, 2024, p. 34 [hereinafter “Darrin Ives Testimony”].

<sup>3</sup> See generally Economic Benefits of Energy Efficiency, International Energy Agency (IEA), <https://www.iea.org/reports/multiple-benefits-of-energy-efficiency-2019/economic-benefits-2> (discussing the relationship between energy pricing, efficiency, and economic growth).

<sup>4</sup> Darrin Ives Testimony at p. 4.

provide affordable service to Evergy's customers which includes our small and medium-size commercial members and industries. While we do not take a position on whether the construction of the new generation projects is necessary, we do have concerns that if these plants are approved, how the costs of those projects will be allocated and how it will affect our local business community.

**III. Effect of Docket No. No. 25-EKCE-207-PRE on the Wichita Regional Chamber's Members**

**Q. Please provide an overview of the Wichita Regional Chamber's membership composition.**

A. As stated before, the Wichita Regional Chamber currently has approximately 1,200 members. Within that total, there are approximately 683 small-sized businesses and 489 medium-sized businesses. The composition of these businesses is formed from a variety of industries including professional services; food, hospitality, and attractions; not-for-profit organizations; retail goods and services; manufacturing; and construction, among others. All of these industries play a vital role in Wichita's regional economy and together employ thousands of individuals from our community.

According to its tariffs, Evergy defines Small General Service customers as those who utilize less than a 220 kW 12-month average<sup>5</sup>, and Medium General Service customers as those who use between a 220 kW and 1,100 kW<sup>6</sup> per month average. I cannot say for certain which specific businesses fall within which specific subclass. But based on the data

---

<sup>5</sup> See *Evergy Kansas Central Small General Service Tariff*, <https://www.evergy.com/-/media/documents/billing/kansas-central/commercial-and-industrial/small-general-service-12212023.pdf>.

<sup>6</sup> See *Evergy Kansas Central Medium General Service Tariff*, <https://www.evergy.com/-/media/documents/billing/kansas-central/commercial-and-industrial/medium-general-service-12212023.pdf>.

provided above, a majority of the Wichita Regional Chamber's members would fall into these categories.

**Q. How would a decision in this docket affect Wichita businesses?**

A. When a business is deciding whether to locate in Wichita, a primary concern is the economic environment and strength of the Wichita business community. Cost of doing business is often a concern for businesses that consider locating to Wichita, but it is also a *deciding* factor on whether a business locates to Wichita. We work closely with the Greater Wichita Partnership to monitor these concerns when speaking with businesses about their decisions. Based on our experience, cost includes talent, taxes, and energy rates, among other factors. With regard to energy rates, it has been a mission of the Wichita Regional Chamber to support policies and incentives that will improve the competitiveness of Kansas utility rates. By doing so, we hope to alleviate any burdens imposed by utility and energy rates that may serve as a deterrent for businesses investigating whether to locate to Wichita.

**Q. How could the decision in this docket affect the Wichita economy?**

A. Of particular concern is the effect of high electricity rates on the decision-making process for businesses that are investigating whether or not to join the Wichita business community. For example, because of Wichita's location, Oklahoma City is a direct competitor of ours when businesses are considering locating in this area of the country. Oklahoma City already has an advantage over Wichita because of their lower electricity rates. According to the U.S. Energy Information Administration, the average price per kilowatt hour in Oklahoma was \$0.0848/kWh, while in Kansas, it was \$0.1074/kWh, for commercial businesses in

December 2024.<sup>7</sup> Similarly, Nebraska averaged \$0.0820/kWh and Arkansas averaged \$0.1011.<sup>8</sup>

With respect to the entire EKC region, Justin Grady with the KCC Utilities Division reported that EKC's commercial electric rates were 4.51% higher than average outside of Kansas, while EKM's commercial electric rates were -3.58% lower than average outside of Kansas.<sup>9</sup> So, electric rates in the Wichita region are not only higher than Wichita's competitor MSAs, the electric rates are higher in this region than they are in other parts of the state. Given these statistics, the Wichita Regional Chamber believes that our region is already at a disadvantage for attracting new businesses to the Wichita region because of our higher retail electric rates. As such, we want to avoid placing our businesses at a greater disadvantage when our region will not be receiving the benefits as later discussed in my testimony.

**Q. How could the decision in this docket affect human capital in Wichita?**

A. The Wichita Regional Chamber has a keen interest in our members' concerns regarding talent acquisition and retention. One of the factors influencing a potential or an existing employee's decision to relocate or remain in the region is the cost of living. One of the critical components in calculating the cost of living is the price of utilities. I believe that the higher the utility cost is, the less attractive a community becomes, making it more difficult to recruit and retain the talent the region needs to sustain and grow our businesses.

---

<sup>7</sup> *Electric Power Monthly*, U.S. Energy Information Administration [https://www.eia.gov/electricity/monthly/epm\\_table\\_grapher.php?t=epmt\\_5\\_6\\_a](https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=epmt_5_6_a) (last visited Mar. 11, 2025).

<sup>8</sup> *Id.*

<sup>9</sup> Justin Grady, Update on Regional Competitiveness of Kansas Electric Rates (Jan. 18, 2024, Slide 14) [https://www.kcc.ks.gov/images/PDFs/presentations-and-legislative-testimony/2024KansasElectricRatesPres\\_HouseEnergy.pdf](https://www.kcc.ks.gov/images/PDFs/presentations-and-legislative-testimony/2024KansasElectricRatesPres_HouseEnergy.pdf).



**Q. Has Evergy demonstrated a need for additional generation in the EKC region?**

A. No. There has not been any real customer growth necessitating new generation for our region.<sup>10</sup>

**Q. Who will benefit from the construction of the new generation projects?**

A. A large concern of the Wichita Regional Chamber is that the EKC region's small and medium-sized business owners will be unfairly impacted by an increase in electric rates, but the economic development and benefits of this new generation seem to favor businesses located in the Evergy Metro (Kansas City) area ("EKM").<sup>11</sup> As I understand the information that has been filed in this docket to date, EKM will not incur any costs related to these new generation projects because the costs of the new generation will be split between EKC and Evergy Missouri West ("EMW").<sup>12</sup> If true, these facts suggest that EKM businesses have an unfair advantage over businesses in the EKC region, because EKM would ultimately be receiving the benefits at the expense of the EKC region.

The Wichita Regional Chamber believes that it is a principle of fairness and economic efficiency to properly allocate the costs to those who will be receiving the economic benefit, especially when it is not equally available to all small and medium-sized

---

<sup>10</sup> See e.g. Evergy, Inc. Form 10-K at 59 (Feb. 26, 2025); Evergy, Inc. Form 10-K at 58 (Feb. 28, 2024); Evergy, Inc. Form 10-K at 58 (Feb. 23, 2023); Evergy, Inc. Form 10-K at 55 (Feb. 24, 2022); Evergy, Inc. Form 10-K at 55 (Feb. 26, 2021); Evergy, Inc. Form 10-K at 49 (Mar. 2, 2020); Evergy, Inc. Form 10-K at 50 (Feb. 21, 2019). These filings illustrate that Evergy Kansas Central has not experienced demand growth in the last six years based on its sales volume history for 2024, 2023, 2022, 2021, 2020, 2019, and 2018.

<sup>11</sup> Direct Testimony of Darrin Ives filed on Nov. 6, 2024, p. 29 ("[a]lthough the IRP does not currently show that Evergy Metro needs natural gas generation in 2030 when the second CCGT unit will go into service, there is a strong possibility that Evergy Metro will experience customer growth that will necessitate the addition of dispatchable generation before 2032...").

<sup>12</sup> Petition of Evergy Kansas Central, Inc. Evergy Kansas South, Inc., and Evergy Metro, Inc. for Determination of Ratemaking Principles and Treatment, Docket No. 25-EKCE-207-PRE (Nov. 6, 2024), ¶ 15, 16. See also Supplemental Direct Testimony of Darrin Ives, Docket No. 25-EKCE-207-PRE (Feb. 14, 2025), p.1 (discussing Evergy's decision to allocate the remaining 50% of the McNew generation site to Evergy Missouri West).

commercial ratepayers. If customer growth in EKM is a driving force for the natural gas plants, then that region should properly cover the costs as it will receive the benefits from the electric generation produced. In economic terms, if those EKM customers are the beneficiaries and cost causers, then they should be allocated the cost recovery burdens, rather than the EKC customers.

Additionally, I understand that Evergy's need for additional load growth is not due to native EKC customers. For example, according to Evergy's Third Quarter 2024 Earnings Presentation, new projects from Google, Panasonic, and Meta in combination represent approximately 750 MW of new Large Customer load.<sup>13</sup> None of these businesses are understood to be located in the EKC region, but rather in the EKM region. Furthermore, the EKC region received a 3.54% revenue *increase* in the 2023 rate case –resulting in an increase in electric rates for EKC, while EKM received a 4.53% revenue *decrease*.<sup>14</sup> To be sure, burdening EKC customers with unrelated costs in this proceeding would be compounding the unjust discrepancy.

#### **IV. Conclusion**

##### **Q. Please state your ultimate conclusions and summarize your testimony.**

A. To the extent the Commission approves Evergy's request to construct two new gas powered generation facilities and one solar facility, and the concomitant ratemaking principles that Evergy requests, the Wichita Regional Chamber desires that the Commission consider and make the necessary adjustments so that the cost impact is fairly distributed across the state.

---

<sup>13</sup>Evergy's Third Quarter 2024 Earnings Presentation, *Slide 11*, <https://investors.evergy.com/static-files/28fb4df5-febf-48bd-b34d-9c4eb4baa195>.

<sup>14</sup> *Kansas Corporation Commission approves settlement agreement in Evergy Rate Case*, News Release (Nov. 21, 2023) <https://www.kcc.ks.gov/news-11-21-23>.

Additionally, as part of that calculation, the Wichita Regional Chamber requests that the Commission ensure that the Wichita region is not placed at an even greater disadvantage (as it relates to the cost of energy) as compared to MSA's such as Oklahoma City and other regional communities.

**Q. Does that conclude your testimony?**

A. Yes.

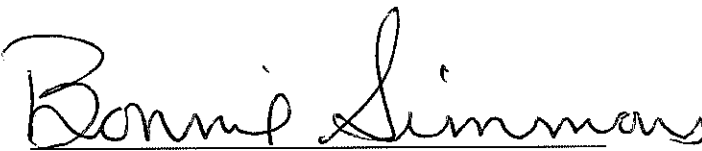
VERIFICATION

STATE OF KANSAS        )  
  ) ss:  
COUNTY OF SEDGWICK )

John Rolfe, being duly sworn upon his oath, deposes and states that he is the President and CEO for the Wichita Regional Chamber of Commerce, that he has read and is familiar with the foregoing *Testimony*, and that the statements therein are true to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
John Rolfe

SUBSCRIBED AND SWORN to before me this 13th day of March, 2025.

  
\_\_\_\_\_  
Notary Public

My Appointment Expires:  
2-20-2027



## CERTIFICATE OF SERVICE

I hereby certify that on the 14<sup>th</sup> day of March, 2025 the foregoing Direct Testimony of John Rolfe on Behalf of The Wichita Regional Chamber was electronically filed with the State Corporation Commission of the State of Kansas and that one copy was delivered to all parties on the service list electronically except as indicated below.

James G. Flaherty, Attorney  
Anderson & Byrd, L.L.P.  
216 S Hickory  
PO Box 17  
Ottawa, KS 66067-0017  
[jflaherty@andersonbyrd.com](mailto:jflaherty@andersonbyrd.com)

Joseph R. Astrab, Consumer Counsel  
Citizens' Utility Ratepayer Board  
1500 SW Arrowhead Rd.  
Topeka, KS 66604  
[Joseph.Astrab@ks.gov](mailto:Joseph.Astrab@ks.gov)

Shonda Rabb  
Citizens' Utility Ratepayer Board  
1500 SW Arrowhead Rd.  
Topeka, KS 66604  
[Shonda.Rabb@ks.gov](mailto:Shonda.Rabb@ks.gov)

Randall F. Larkin, Attorney  
City of Lawrence  
PO Box 708  
Lawrence, KS 66044  
[rlarkin@lawrenceks.org](mailto:rlarkin@lawrenceks.org)

Shelly M. Bass, Senior Attorney  
Atmos Energy Corporation  
5430 LBJ Freeway  
1800 Three Lincoln Centre  
Dallas, TX 75240  
[Kathleen.Ocanas@atmosenergy.com](mailto:Kathleen.Ocanas@atmosenergy.com)

Todd E. Love, Attorney  
Citizens' Utility Ratepayer Board  
1500 SW Arrowhead Rd.  
Topeka, KS 66604  
[Todd.Love@ks.gov](mailto:Todd.Love@ks.gov)

Della Smith  
Citizens' Utility Ratepayer Board  
1500 SW Arrowhead Rd.  
Topeka, KS 66604  
[Della.Smith@ks.gov](mailto:Della.Smith@ks.gov)

Brandon McGuire, Asst. City Manager  
City of Lawrence  
PO Box 708  
Lawrence, KS 66044  
[bmcguire@lawrenceks.org](mailto:bmcguire@lawrenceks.org)

Kathy Richardson, Sustainability Director  
City of Lawrence  
PO Box 708  
Lawrence, KS 66044  
[krichardson@lawrenceks.org](mailto:krichardson@lawrenceks.org)

Toni Wheeler, Director, Legal Services  
Dept.  
City of Lawrence  
City Hall  
6 East Sixth St  
Lawrence, KS 66044  
[twheeler@lawrenceks.org](mailto:twheeler@lawrenceks.org)

Dorothy Barnett  
Climate & Energy Project  
PO Box 1858  
Hutchinson, KS 67504-1858  
[barnett@climateandenergy.org](mailto:barnett@climateandenergy.org)

Cathryn J. Dinges, Sr Dir. & Reg. Affairs Counsel  
Evergy Kansas Central, Inc.  
818 S Kansas Ave  
PO Box 889  
Topeka, KS 66601-0889  
[Cathy.Dinges@evergy.com](mailto:Cathy.Dinges@evergy.com)

Leslie Wines, Sr. Exec. Admin Asst.  
Evergy Kansas Central, Inc.  
818 S Kansas Ave  
PO Box 889  
Topeka, KS 66601-0889  
[leslie.wines@evergy.com](mailto:leslie.wines@evergy.com)

Daniel J. Buller, Attorney  
Foulston Siefkin LLP  
7500 College Boulevard, Ste 1400  
Overland Park, KS 66201-4041  
[dbuller@foulston.com](mailto:dbuller@foulston.com)

Molly E. Morgan, Attorney  
Foulston Siefkin LLP  
1551 N. Waterfront Parkway  
Suite 100  
Wichita, KS 67206  
[mmorgan@foulston.com](mailto:mmorgan@foulston.com)

Sarah C. Otto  
Foulston Siefkin LLP  
7500 College Boulevard, Ste 1400  
Overland Park, KS 66201-4041  
[sotto@foulston.com](mailto:sotto@foulston.com)

Lee M. Smithyman, Attorney  
Foulston Siefkin LLP  
7500 College Boulevard, Ste 1400  
Overland Park, KS 66201-4041  
[lsmithyman@foulston.com](mailto:lsmithyman@foulston.com)

C. Edward Watson, Attorney  
Foulston Siefkin LLP  
1551 N. Waterfront Parkway  
Suite 100  
Wichita, KS 67206  
[cewatson@foulston.com](mailto:cewatson@foulston.com)

James P. Zakoura, Attorney  
Foulston Siefkin LLP  
7500 College Boulevard, Ste 1400  
Overland Park, KS 66201-4041  
[jzakoura@foulston.com](mailto:jzakoura@foulston.com)

Kevin M. Fowler, Counsel  
Fieden & Forbes, LLP  
1414 SW Ashworth Place Ste 201  
Topeka, KS 66604  
[kfowler@fllawllp.com](mailto:kfowler@fllawllp.com)

Constance Chan, Senior Category Manager  
– Electricity & Business Travel  
HF Sinclair El Dorado Refining LLC  
2323 Victory Ave. Ste 1400  
Dalla, TX 75219  
[constance.chan@hfsinclair.com](mailto:constance.chan@hfsinclair.com)

Jon Lindsey, Corporate Counsel  
HF Sinclair El Dorado Refining LLC  
550 E. South Temple  
Salt Lake City, UT 84102  
[jon.lindsey@hfsinclair.com](mailto:jon.lindsey@hfsinclair.com)

Brian G. Fedotin, General Counsel  
Kansas Corporation Commission  
1500 SW Arrowhead Rd  
Topeka, KS 66604  
[Brian.Fedotin@ks.gov](mailto:Brian.Fedotin@ks.gov)

Justin Grady, Chief of Revenue  
Requirements, Cost of Service & Finance  
Kansas Corporation Commission  
1500 SW Arrowhead Rd  
Topeka, KS 66604  
[Justin.Grady@ks.gov](mailto:Justin.Grady@ks.gov)

Patrick Hurley, Chief Litigation Counsel  
Kansas Corporation Commission  
1500 SW Arrowhead Rd  
Topeka, KS 66604  
[Patrick.Hurley@ks.gov](mailto:Patrick.Hurley@ks.gov)

Carly Masenthin, Litigation Counsel  
Kansas Corporation Commission  
1500 SW Arrowhead Rd  
Topeka, KS 66604  
[Carly.Masenthin@ks.gov](mailto:Carly.Masenthin@ks.gov)

Janet Buchanan, Director of Rates & Regulatory  
Kansas Gas Service, A Division of One Gas, Inc.  
7421 W 129<sup>th</sup> Street  
Overland Park, KS 66213  
[janet.buchanan@onegas.com](mailto:janet.buchanan@onegas.com)

Lorna Eaton, Manager of Rates & Regulatory Affairs  
Kansas Gas Service, A Division of One Gas, Inc.  
7421 W 129<sup>th</sup> Street  
Overland Park, KS 66213  
[lorna.eaton@onegas.com](mailto:lorna.eaton@onegas.com)

Robert E. Vincent, Managing Attorney  
Kansas Gas Service, A Division of One Gas, Inc.  
7421 W 129<sup>th</sup> Street  
Overland Park, KS 66213  
[robert.vincent@onegas.com](mailto:robert.vincent@onegas.com)

Paul Mahlberg, General Manager  
Kansas Municipal Energy Agency  
6300 W 95<sup>th</sup> St  
Overland Park, KS 66212-1431  
[mahlberg@kmea.com](mailto:mahlberg@kmea.com)

Terri J. Pemberton, General Counsel  
Kansas Municipal Energy Agency  
6300 W 95<sup>th</sup> St  
Overland Park, KS 66212-1431  
[pemberton@kmea.com](mailto:pemberton@kmea.com)

Darren Prince, Manager, Regulatory & Rates  
Kansas Municipal Energy Agency  
6300 W 95<sup>th</sup> St  
Overland Park, KS 66212-1431  
[prince@kmea.com](mailto:prince@kmea.com)

James Ging, Director Engineering Services  
Kansas Power Pool  
100 N. Broadway Ste L110  
Wichita, KS 67202  
[jging@kpp.agency](mailto:jging@kpp.agency)

Colin Hansen, CEO/General Manager  
Kansas Power Pool  
100 N. Broadway Ste L110  
Wichita, KS 67202  
[chansen@kpp.agency](mailto:chansen@kpp.agency)

Larry Holloway, Asst. Gen. Mgr. Operations  
Kansas Power Pool  
100 N. Broadway Ste L110  
Wichita, KS 67202  
[lholloway@kpp.agency](mailto:lholloway@kpp.agency)

Alissa Greenwald, Attorney  
Keyes & Fox LLP  
1580 Lincoln Street Ste 1105  
Denver, CO 80203  
[AGREENWALD@KEYESFOX.COM](mailto:AGREENWALD@KEYESFOX.COM)

Jason Keyes, Partner  
Keyes & Fox LLP  
580 California St 12<sup>th</sup> Floor  
San Francisco, CA 94104  
[JKEYES@KEYESFOX.COM](mailto:JKEYES@KEYESFOX.COM)

Patrick Parke, CEO  
Midwest Energy, Inc.  
1330 Canterbury Rd  
PO Box 898  
Hays, KS 67601-0989  
[patparke@mwenergy.com](mailto:patparke@mwenergy.com)

Aaron Rome, VP of Energy Supply  
Midwest Energy, Inc.  
1330 Canterbury Rd  
PO Box 898  
Hays, KS 67601-0989  
[arome@mwenergy.com](mailto:arome@mwenergy.com)

Valerie Smith, Administrative Assistant  
Morris Laing Evans Brock & Kennedy  
800 SW Jackson  
Suite 1310  
Topeka, KS 66612-1216  
[vsmith@morrislaing.com](mailto:vsmith@morrislaing.com)

Trevor Wohlford, Attorney  
Morris Laing Evans Brock & Kennedy  
800 SW Jackson  
Suite 1310  
Topeka, KS 66612-1216  
[twohlford@morrislaing.com](mailto:twohlford@morrislaing.com)

Glenda Cafer, Morris Laing Law Firm  
Morris Laing Evans Brock & Kennedy  
CHTD  
800 SW Jackson  
Suite 1310  
Topeka, KS 66612-1216  
[gcafer@morrislaing.com](mailto:gcafer@morrislaing.com)

Rita Low, Paralegal  
Morris Laing Evans Brock & Kennedy  
CHTD  
300 N. Mead Ste 200  
Wichita, KS 67202-2745  
[rlowe@morrislaing.com](mailto:rlowe@morrislaing.com)

Will B. Wohlford, Attorney  
Morris Laing Evans Brock & Kennedy  
CHTD  
300 N. Mead Ste 200  
Wichita, KS 67202-2745  
[wwohlford@morrislaing.com](mailto:wwohlford@morrislaing.com)

Ashok Gupta, Expert  
National Resources Defense Council  
20 N Wacker Drive Suite 1600  
Chicago, IL 60606  
[agupta@nrdc.org](mailto:agupta@nrdc.org)

Dan Bruer, Executive Director  
New Energy Economics  
1390 Yellow Pine Ave  
Boulder, CO 80305  
[dan.bruer@newenergyeconomics.org](mailto:dan.bruer@newenergyeconomics.org)

Tim Opitz  
Opitz Law Firm, LLC  
308 E. High Street  
Suite B101  
Jefferson City, MO 65101  
[tim.opitz@opitzlawfirm.com](mailto:tim.opitz@opitzlawfirm.com)

Anne E. Callenbach, Attorney  
Polsinelli PC  
900 W 48<sup>th</sup> Place Ste 900  
Kansas City, MO 64112  
[acallenbach@polsinelli.com](mailto:acallenbach@polsinelli.com)

Frank A. Caro, Attorney  
Polsinelli PC  
900 W 48<sup>th</sup> Place Ste 900  
Kansas City, MO 64112  
[fcaro@polsinelli.com](mailto:fcaro@polsinelli.com)

Jared R. Jevons, Attorney  
Polsinelli PC  
900 W 48<sup>th</sup> Place Ste 900  
Kansas City, MO 64112  
[JJEVONS@POL SINELLI.COM](mailto:JJEVONS@POL SINELLI.COM)

Greg Wright  
Priority Power Mgt.  
12512 Augusta Dr  
Kansas City, KS 66109  
[gwright@prioritypower.com](mailto:gwright@prioritypower.com)

James Owen, Counsel  
Renew Missouri Advocates  
915 E Ash Street  
Columbia, MO 65201  
[JAMES@RENEWMO.ORG](mailto:JAMES@RENEWMO.ORG)

Timothy J. Laughlin, Attorney  
Schoonover & Moriarty, LLC  
130 N. Cherry Street, Ste 300  
Olathe, KS 66061  
[tlaughlin@schoonoverlawfirm.com](mailto:tlaughlin@schoonoverlawfirm.com)

Peggy A. Trent, Chief County Counselor  
The Board of County Commissioners of  
Johnson County  
111 S. Cherry Ste 3200  
Olathe, KS 66061  
[peg.trent@jocogov.org](mailto:peg.trent@jocogov.org)



Robert R. Titus  
Titus Law Firm, LLC  
7304 W. 130<sup>th</sup> St.  
Suite 190  
Overland Park, KS 66213  
[rob@tituslawkc.com](mailto:rob@tituslawkc.com)

J.T. Klaus, Attorney  
Triplett, Woolf & Garretson, LLC  
2959 N Rock Rd Ste 300  
Wichita, KS 67226  
[jtklaus@twgfirm.com](mailto:jtklaus@twgfirm.com)

Kacey S. Mayes, Attorney  
Triplett, Woolf & Garretson, LLC  
2959 N Rock Rd Ste 300  
Wichita, KS 67226  
[ksmayes@twgfirm.com](mailto:ksmayes@twgfirm.com)

Timothy E. Mckee, Attorney  
Triplett, Woolf & Garretson, LLC  
2959 N Rock Rd Ste 300  
Wichita, KS 67226  
[TEMCKEE@TWGFIRM.COM](mailto:TEMCKEE@TWGFIRM.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](mailto:john.j.mcnutt.civ@army.mil)

Dan Lawrence, General Counsel – USD 259  
Unified School District 259  
903 S Edgemoor Rm 113  
Wichita, KS 67218  
[dlawrence@usd259.net](mailto:dlawrence@usd259.net)

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](mailto:kevin.k.lachance.civ@army.mil)

*/s/ C. Edward Watson, II*  
C. Edward Watson, II