

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

REBUTTAL TESTIMONY OF

BRETT L. LOVELL

**ON BEHALF OF
EVERGY METRO, INC.
EVERGY KANSAS SOUTH, INC.**

**AND
KANSAS ELECTRIC POWER COOPERATIVE, INC.**

**IN THE MATTER OF THE 2023
WOLF CREEK TRIENNIAL DECOMMISSIONING
FINANCING PLAN.**

DOCKET NO. 24-WCNE-235-GIE

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

2 A: My name is Brett L. Lovell. My business address is 1200 Main Street. Kansas City, Mo,
3 64105.

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

5 A: I am employed by Evergy Metro, Inc. (“EM”) and Evergy Kansas South, Inc. (“EKS”)
6 (collectively “the Company”) as Manager, Corporate Treasury.

7 **Q: Are you the same Brett L. Lovell who submitted direct testimony in this docket to**
8 **support the Joint Pleading Regarding Decommissioning Financing Plan filed on**
9 **September 1, 2023?**

10 A: Yes.

1 **Q: On whose behalf are you presenting this testimony?**

2 A: I am presenting this testimony on behalf of the three co-owners of Wolf Creek, including
3 EM, EKS, and Kansas Electric Power Cooperative, Inc. (“KEPCo”).

4 **Q: What is the purpose of your rebuttal testimony?**

5 A: The purpose of my testimony is to respond to the direct testimony of KCC Staff
6 witnesses Adam H. Gatewood and Ashlyn M. Hefley.

7 **Q: Do you agree with the recommendations of KCC Staff witness Gatewood?**

8 A: Yes, the Owners support Mr. Gatewood's recommendations, which were in agreement
9 with the Owners' proposals in the original filing regarding forecast assumptions and
10 future contribution amounts. Additionally, the Owners agree with Mr. Gatewood's
11 recommendation that if the Commission adopts the decommissioning methodology and
12 schedule of cash flows that are set out in Attachment 4 of the Joint Pleading Regarding
13 Decommissioning Financing Plan, then subsequent annual funding dockets are not
14 necessary.

15 **Q: Staff witness Hefley mentions that there is a possibility to extend the life of Wolf
16 Creek beyond 2045. Do you agree?**

17 A: Yes. I agree and I also agree with witness Hefley that any extension of plant life is not
18 part of this proceeding.

19 **Q: Staff witness Hefley recommends that the Company make the Commission aware of
20 supplemental licensing in future triennial filings. What is your response?**

21 A: The Company agrees and will provide general industry supplemental licensing
22 information in future triennial reports and an update of Wolf Creek supplemental
23 licensing activities, if any. However, as noted in witness Gatewood's reply, it is unlikely

1 that a request to extend the facility's operating license will occur by the time of the next
2 triennial review.

3 **Q: Does that conclude your testimony?**

4 A: Yes.

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

In the Matter of the 2023 Wolf Creek Triennial)
Decommissioning Financing Plan) Docket No. 24-WCNE-325-GIE
)

AFFIDAVIT OF BRETT L. LOVELL

STATE OF MISSOURI)
) **ss**
COUNTY OF JACKSON)

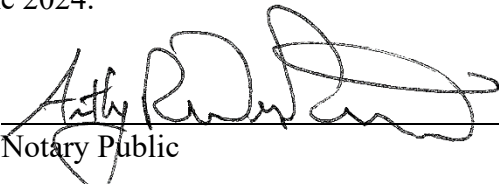
Brett L. Lovell, being first duly sworn on his oath, states:

1. My name is Brett L. Lovell. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Manager, Corporate Treasury.
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of EM, EKS, and KEPCo consisting of three (3) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.
3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.



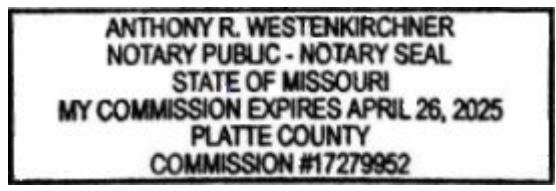
Brett L. Lovell

Subscribed and sworn before me this 10th day of June 2024.



Notary Public

My commission expires: 4/26/2025



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above was electronically served, hand-delivered or mailed, postage prepaid, this 10th day of June 2024 to:

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

ROGER W. STEINER, CORPORATE
COUNSEL
EVERGY KANSAS CENTRAL, INC
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
roger.steiner@evergy.com

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

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

KYLER C. WINEINGER, LITIGATION
COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
k.wineinger@kcc.ks.gov

SUSAN B. CUNNINGHAM, SVP,
Regulatory and Government Affairs, General
Counsel
KANSAS ELECTRIC POWER CO-OP, INC.
600 SW CORPORATE VIEW
PO BOX 4877
TOPEKA, KS 66604-0877
scunningham@kepco.org

/s/ Roger W. Steiner

Roger W. Steiner