

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

In the Matter of the Capital Plan Compliance )  
Docket for Kansas City Power & Light ) Docket No. 19-KCPE-096-CPL  
Company and Westar Energy, Inc. Pursuant to )  
the Commission's Order in 18-KCPE-095- )  
MER. )

**COMMENTS OF THE CITIZENS' UTILITY RATEPAYER BOARD RELATED TO  
THE 2022 ANNUAL UPDATE TO EVERGY'S INTEGRATED RESOURCE PLAN**

COMES NOW, the Citizens' Utility Ratepayer Board (“CURB”) and submits its comments pursuant to the schedule set forth in the State Corporation Commission of the State of Kansas (“KCC” or “Commission”) *Order Adopting Integrated Resource Plan and Capital Plan Framework* issued in this docket on February 6, 2020, which requires an annual update by Evergy. This year’s update was filed on June 10, 2022, as *Evergy KS Central and Metro 2022 Annual Update*. In support of its comments, CURB states the following:

**Background**

1. As part of the approved Integrated Resource Plan (“IRP”) reporting process, Evergy Kansas Central and Evergy Kansas Metro (collectively “Evergy”) is required to file an annual update in between triennial reports and due three months after Missouri’s annual update.<sup>1</sup>
2. On June 3, 2021, Evergy filed its 2021 revised IRP.<sup>2</sup> In this update, Evergy selected from among various portfolios of resources to meet customer requirements at the lowest reasonable cost based on the expected net present value revenue requirement of each Alternative Resource Plan (“ARP”) from its resource modeling results. Table 119 in the 2021 update showed that

---

<sup>1</sup> *Order Adopting Integrated Resource Plan and Capital Plan Framework*, pg. 11, ¶24. February 6, 2020.

<sup>2</sup> *Evergy Kansas Central and Metro 2021 Integrated Resource Plan Revised*, June 3, 2021. (“2021 IRP Update”).

Demand-Side Management (DSM) will experience significant growth and integration in Evergy's resource portfolio.<sup>3</sup> Further, Evergy contemplated adding 700 MW of solar in 2023-2024, before adding more wind generation. Tables 120 and 121 indicated a similar trend for Evergy Kansas Central and Evergy Metro and additional solar generation through 2032.

3. On November 1, 2021, CURB and several other intervenors filed comments in response to the 2021 IRP Update.<sup>4</sup> CURB retained the services of Synapse Energy Economics, Inc. in order to evaluate the IRP and provide in-depth analyses of Evergy's filing.

4. In its 2021 comments, CURB highlighted three areas of concern: modeling decisions and input assumptions and presentation; limited demand-side management ("DSM") offerings in Kansas; and external risk factors that result in increased costs passed onto ratepayers.<sup>5</sup>

5. On December 16, 2021, CURB, Evergy, Staff, and several intervening parties submitted a joint filing to apprise the Commission of the status on alleged deficiencies in Evergy's 2021 IRP Update.<sup>6</sup> The document explained how each deficiency was addressed and whether it has been fully, partially, or not yet resolved. A handful of parties requested that the Commission determine whether to conduct an evidentiary hearing over any of the unresolved conflicts. Parties reserved the ability to comment on issues that remain unresolved by the time the 2022 and 2023 IRP updates are released.

6. In regards to CURB's 2021 comments and concerns, Evergy committed to using newly acquired modeling software, PLEXOS, in future IRPs and to continue refining its presentation of results and analyses.<sup>7</sup> Further, Evergy explained how it planned to file a DSM

---

<sup>3</sup> *2021 IRP Update* at pg. 164, Section 8.1.1.

<sup>4</sup> *Comments of The Citizens' Utility Ratepayer Board Related to the 2021 Annual Update to Evergy's Integrated Resource Plan*, pg. 4, ¶9, (November 1, 2021). ("2021 CURB Comments").

<sup>5</sup> *Id.* at pg. 4, ¶9.

<sup>6</sup> *Evergy KS IRP Joint Agreement*, (December 16, 2022).

<sup>7</sup> *Id.* at pgs. 10-11, ¶¶27-28.

application by the end of 2021, citing that the outcomes of that docket will determine the degree that this concern has been resolved. In response to CURB identifying several external risk factors, Evergy agreed to include additional explanations over decisions and evaluations of such factors and allow for feedback on those efforts.<sup>8</sup>

7. On May 12, 2022, the Commission issued an order regarding the outstanding deficiencies from the 2021 IRP Update.<sup>9</sup> It determined that Evergy had complied with the IRP framework requirements for filing updates and that the pending deficiencies did not require a hearing at that time, but acknowledged that parties still reserved their right to raise these issues in future proceedings.

8. On February 28, 2022, Evergy filed its second update to the Capital Investment Plan (“CIP”).<sup>10</sup> Compared to the 2021 update, Evergy’s capital investment plans for both jurisdictions included an increase of approximately \$1.04 billion for the 2022-2026 planning timeframe.

9. On July 8, 2022, CURB and other parties filed responsive comments to the 2022 CIP update.<sup>11</sup> CURB indicated concerns over the level of increased spending on renewable generation and information technology and whether it will be needed to serve customers and maintain reliable service.

10. On June 10, 2022, Evergy filed its annual update to the IRP (“2022 IRP Update”).<sup>12</sup>

---

<sup>8</sup> Evergy also responded to CURB’s concern with the timing of Docket No. 22-EKCE-141-PRE, regarding plant retirement plans and reduction of solar deployment. However, the application in that docket was withdrawn after the deadline to file comments had passed and obviated the concern.

<sup>9</sup> *Order on Joint Filing Regarding Proposed Resolutions to Concerns Raised with Triennial 2021 Integrated Resource Plan*, (May 12, 2022).

<sup>10</sup> *Evergy Kansas Capital Investment Plan Update, public version*, (February 28, 2022). (“2022 CIP Update”).

<sup>11</sup> *Comments of The Citizens' Utility Ratepayer Board Regarding the Evergy Kansas Metro and Evergy Kansas Central Capital Investment Plan 2022 Update Filing*, (July 8, 2022).

<sup>12</sup> *Evergy KS Central and Metro 2022 Annual Update*, (June 10, 2022). (“2022 IRP Update”).

## CURB's Comments

### **A. Resource Modeling and Reporting Compliance**

11. Evergy presents the IRP in Kansas to inform the Commission about its strategy to acquire adequate resources at the lowest reasonable cost and to facilitate feedback from stakeholders. At the onset, CURB believes that this 2022 IRP Update complies with the Commission's requirements from the IRP framework. However, CURB reserves the right to change its position on any issue contained in these comments in light of additional information in other dockets. Further, CURB's silence on any particular aspect of the IRP is not intended to be an indication of support or acquiescence to that aspect.

12. In response to recommendations from parties, Evergy made several changes to its methodology, as described in Section 7 of the 2022 update and with the 2021 joint filing. Evergy resolved one of CURB's concerns regarding Evergy's modeling methodology and is now utilizing PLEXOS for capacity expansion and production cost modeling and PROMOD for market price forecasts.<sup>13</sup> PLEXOS will allow Evergy to generate a lowest cost resource plan from different market scenarios by utilizing sets of constraints and resource options. PROMOD will produce more granular nodal forecasts akin to SPP's economic modeling methodology. CURB is pleased to see these changes and believes that the new software will continue providing more detailed analyses and allow Evergy to expand its resource planning capabilities.

13. One outcome from this modeling change is Evergy's approach to renewable energy investments. Throughout the IRP process and other dockets, Evergy has touted its intention to increase the presence of renewable resources in its energy mix, namely wind and solar. CURB saw the 22-EKCE-141-PRE docket, wherein Evergy Kansas Central sought predetermination related

---

<sup>13</sup> 2022 IRP Update at pg. 9, Section 1.3.

to a proposed investment in solar and proposed retirement of Lawrence Energy Center coal facilities, as a step toward meeting that goal. However, Evergy Kansas Central was unable to obtain information it needed to proceed with the docket and chose to withdraw the application.<sup>14</sup>

14. Evergy's plans for renewable generation has been affected by external market factors, resulting in a shift in timing of additions. In the 2022 IRP Update and CIP reports, Evergy described a number of capital investment increases for renewable generation. Specifically, on the timing of these investments, Evergy indicates that the timing of when wind and solar would be built has been altered to account for supply-chain issues related to recent events.<sup>15</sup> Much like other external risk factors, such as rising natural gas prices, Evergy views these conditions as temporary disruptions (i.e. less than two years). In short, the change in timing reduces the amount of solar additions in the 2024-25 timeframe while pulling forward wind additions while the supply-chain issues persist.

15. Although CURB can appreciate this shift and the supporting reasons, commodity prices and supply chain issues are not likely to be completely ameliorated with just time. The COVID-19 pandemic still remains a strain on the economy and labor market, even as Kansas and other states are moving into "post-COVID" normalization. The lingering effects of the pandemic across all sectors, along with various other causes, are holding back improvements to the outlook.<sup>16</sup> Labor supply is still unable to match record-high labor demand that has been present since February 2021. Rising natural gas prices can rattle an entire sector of the economy by virtue of folding in those extra costs to provide the same goods and services. The conditions that are driving

---

<sup>14</sup> See Docket No. 22-EKCE-141-PRE.

<sup>15</sup> *Id.* at pgs. 10-12, Section 1.4.1.

<sup>16</sup> "Economy Statement by Benjamin Harris, Assistant Secretary for Economy Policy, for the Treasury Borrowing Advisory Committee August 1, 2022," U.S. Dept. of the Treasury (August 1, 2022). Accessed at: <https://home.treasury.gov/news/press-releases/jy0903>.

these factors may fade away over the next few years, but it is unlikely that prices, labor, and commodities will go back to pre-pandemic levels. Each year away from the pandemic is another year of market adjustments and issues that slowly have to be built into Evergy's modeling, raising the costs of providing service. The recent degree of external changes remains concerning in light of the pace at which they are occurring.

## **B. External Risk Factors**

16. External risk factors that impact the projected costs and operating expenses are present in a number of Evergy's resource planning considerations. In its 2021 comments, CURB discussed the potential for economic considerations to change Evergy's planning strategies, such as environmental retrofits or conversions and rising fuel prices.<sup>17</sup> Section 6.2 in the 2022 IRP Update examines various risk factors that Evergy considered in resource acquisition planning.<sup>18</sup> In regards to retrofits and retirements, Evergy notes that its preferred portfolio is missing data related to committing to specific plant retirement plans. Part of this uncertainty is on how to value Jeffery Energy Center Unit 2 for retirement compared to upgrading and retiring another unit.<sup>19</sup> Reserve capacity requirement changes can also affect the decision to retire a plant, as discussed below. The interplay between these considerations and the goal of providing service at the lowest reasonable cost demonstrates how every part of resource planning is connected and how balancing larger utility and ratepayer interests can become challenging.

17. Recent changes to regional reserve margin planning will likely lead to changes in Evergy's preferred portfolio. Under the Southwest Power Pool's ("SPP") Open Access Transmission Tariff, Evergy is required to have a sufficient level of firm capacity to meet SPP's

---

<sup>17</sup> See *2021 CURB Comments* at pgs. 32-36.

<sup>18</sup> *2022 IRP Update* at pgs. 89-99.

<sup>19</sup> *Id.* at pgs. 48-51, Section 5.2.

established Planning Reserve Margin (“PRM”), as part of SPP’s Resource Adequacy Requirements.<sup>20</sup> At the time the 2022 IRP Update was filed, the PRM was set to 12% and calculated using the forecasted Net Peak Demand and a utility’s accredited firm capacity. After Winter Storm Uri in February 2021, regional and federal regulators took steps to modify reliability risk evaluations and responses. In August 2022, SPP announced that it will be raising the PRM to 15% and redefine how it accredits generation based on historical performance.<sup>21</sup> Evergy had acknowledged this potential development in Section 6 of the 2022 IRP Update. In that section, Evergy notes that while resource performance has historically been accounted for in PRMs, the change to using historical performance of the generator may change the accredited capacity assigned to each plant.<sup>22</sup> Evergy indicated concerns that this type of accreditation will complicate long-term resource planning as it shifts the underlying values that Evergy would use for each of its generators rather than an established, static value.<sup>23</sup>

18. Evergy’s observations in the IRP and the comparison to renewable capacity accreditation may result in a “moving target” in future planning processes. CURB does not participate in SPP’s decision-making process and has limited experience with their reserve margin planning framework. It is unclear how much input Evergy had in SPP’s decision to raise the reserve margin. But it is clear that Evergy intends to put a significant amount of capital expenditure into renewable generation. At this high level, CURB can foresee the scenario where Evergy’s expansion of renewable generation infrastructure and uncertainty surrounding plant retirement conflicts with SPP’s regional reliability planning. The resolution of that conflict could require

---

<sup>20</sup> “Attachment A Resource Adequacy,” SPP, Open Access Transmission Tariff, 6th Revised Vol. No. 1. Accessed at: <https://www.spp.org/documents/58597/attachment%20aa%20tariff.pdf>.

<sup>21</sup> “Stakeholder Report August 2022: a quarterly note from SPP’s Officer Team,” SPP, (August 2022). Accessed at: <https://www.spp.org/newsroom/stakeholder-report/>. On August 18, 2022, the KCC working group representative to SPP presented this information during its quarterly report to the Commission.

<sup>22</sup> 2022 IRP Update at pgs. 91-93.

<sup>23</sup> *Id.* at pg. 92.

Evergy to build more infrastructure or alter retirement plans to meet higher planning requirements or require SPP to make changes to how it measures capacity. The former may be the path of lesser resistance and would result in even higher spending than currently forecasted. This would mean higher bills for ratepayers. CURB urges the Commission and Evergy to monitor this situation through their ability to interact with SPP and other utilities in the region.

19. The price of natural gas is an important consideration for Evergy when it evaluates resource acquisition plans. In CURB's 2021 comments, CURB compared Evergy's projections on gas prices at a low/medium/high scenario with the NYMEX Futures and the then-current average price.<sup>24</sup> Figure 9 of those comments showed that Evergy's projections for natural gas prices was already below the market prices at that time. Evergy's high forecast in 2021 was \$5.00 per MMBtu by 2040. CURB emphasized the need for Evergy to be mindful of this underestimation and the possible impact on ratepayers. CURB suggested that the lessons learned from Winter Storm Uri be considered and incorporated into Evergy's resource planning and when deciding where to make its investments in generation. However, in that short period from November 2021 when CURB filed those comments to the present day, the natural gas market has experienced an even sharper increase than forecasted.

20. Natural gas prices have exceeded the forecasts from 2021 and it is unclear when and at what level prices will be considered "normal" again. Compounding external factors and conflicts have contributed to a massive spike in the gas market. Prices were over \$6/MMBtu by April 2022 and jumped past \$8.00 in May. Since May 2022, gas prices have hovered between \$7 and \$8/MMBtu.<sup>25</sup> CURB does not intend to infer that Evergy was unreasonable in its projections

---

<sup>24</sup> 2021 CURB Comments at pgs. 33-34, Figure 9.

<sup>25</sup> "Henry Hub Natural Gas Spot Price (Dollars Per Million Btu)," U.S. Energy Information Administration (Updated August 24, 2022) Accessed at: <https://www.eia.gov/dnav/ng/hist/rngwhhdM.htm>.



in light of the circumstances, but highlights this increase to emphasize the need for Evergy to diligently consider the economics of natural gas in its generation mix and retirement plans. CURB has participated in a number of discussions with natural gas and electric utilities regarding hedging strategies and budgets. One takeaway from these meetings is that the market is treading volatile territory and there are few definitive signs of relief in the near future. In the IRP, Evergy views these conditions as temporary and appears intent on weathering the increases with its long-term planning. CURB would renew and incorporate by reference its concerns from the 2021 comments regarding planning for rising gas prices and stranded assets in light of this development in commodity prices.

21. Although not specifically mentioned in the IRP, CURB is interested to see how Evergy's increased spending on Information Technology ("IT") will impact operations and resource planning. CURB has previously commented on Evergy's plans to overhaul its operations and customer communication resources to introduce a new, comprehensive IT system. During informational meetings on the topic, Evergy explained how its current system utilizes several independent software vendors for different parts of its operation, from customer bill coding to data collection. This fragmented system makes implementing bill changes burdensome as each vendor must review and approve a modification to work with their respective software. This new system will function like a larger operating system where each function for a particular task is already designed to integrate into the system. For example, the time lag associated with separate vendors approving a new bill surcharge through each part of the system is eliminated where only one system is responsible from creation to distribution of the bill. Evergy expects this efficiency will, at a minimum, reduce the time and effort needed to make bill changes.

22. Evergy indicated that this overhaul will affect virtually all aspects of their operations and enhance the customer service experience through more accessibility. While CURB has reservations on how customers may value more interaction with their utility, the ability to track and monitor usage data of its customers presents a unique opportunity to study energy burden in Kansas. CURB could envision such a modification that opens up ways to collect usage data throughout the year. CURB has taken efforts recently to meet with utilities and stakeholders on the problem of energy burden in Kansas and how to begin working to address it. The common takeaway from these interactions is that information regarding customers that are impacted by higher energy bills is not readily available. If Evergy is able to acquire new software dedicated to enhanced resource planning capabilities, certainly it can utilize its resources to collect usage and customer data for this purpose.

23. CURB believes that the utility can improve its resource planning if it understands more about potential underlying causes behind the demand it seeks to meet. For example, geographical areas of low-income residents or energy-inefficient buildings may consume more energy than areas capable of making personal investments to lower consumption. Building additional generation to keep up with that load makes sense on paper. However, with this extra context available, a lesser cost option may be to improve those customers' ability to reduce usage. To that end, DSM and a low-income tariff could play a helpful role in resource planning. CURB is hopeful that this example is within the realm of possibility for Evergy's IT plans and its strategy for resource planning once the new system is implemented.

### **C. Preferred Portfolio Selection and DSM**

24. In the 2022 Update, Evergy has chosen a portfolio (CDAAA) that is lower cost than the 2021 preferred portfolio, but not the least-cost option by its 2022 modeling results. Specifically,

Evergy explains that it selected this plan because it allows Evergy to continue building renewables while remaining flexible to technology and policy changes.<sup>26</sup> Evergy refers to uncertainty with plant retirement and retrofitting considerations in selecting the 2022 preferred portfolio. Similarly, in 2021, Evergy Metro's preferred portfolio reflected how differences in DSM assumptions between the preferred portfolio and lowest cost ARP supported that decision.<sup>27</sup> In any event, assumptions related to DSM in Kansas are used to support decisions on resource planning. However, there is uncertainty surrounding the review of Evergy's application to implement DSM programs in Docket No. 22-EKME-254-TAR ("22-254 Docket"). On August 23, 2022, Evergy filed a motion to stay the determination of the settlement agreements submitted there in order to continue discussions towards a more inclusive resolution. At this point in time, it is unclear whether the level of DSM efforts needed to match or exceed Evergy's IRP projections in the measured timeframe will be implemented.

25. Evergy still presents these resource acquisition decisions as malleable, pending further study of DSM progress in Kansas. While DSM is accounting for a smaller portion of its resource portfolio in the near term, larger projections in the late 2020s and beyond appear to be reliant upon the implementation and ramping up of DSM programs starting now. If DSM in Kansas cannot keep pace with what the IRP contemplates, Evergy will likely have to redo its modeling scenarios and considerations when choosing its preferred portfolio. Insofar as Evergy ultimately does not implement any new DSM programs in Kansas, CURB's concerns about DSM from its 2021 comments apply to this 2022 update. To the degree that this concern remains unresolved, CURB recognizes that activity beyond the scope of this docket is necessary to address the topics that CURB has highlighted in this IRP process.

---

<sup>26</sup> 2022 IRP Update at pg. 84, Section 6.1.

<sup>27</sup> 2021 IRP Update at pgs. 166-167.

26. DSM is a well-known, least-cost resource for utilities to tap in order to meet changing customer demands. During the 22-254 Docket, CURB and several groups referred to Kansas's 47<sup>th</sup> place ranking from the American Council for an Energy Efficiency-Economy ("ACEEE") in 2020.<sup>28</sup> The ACEEE published an updated scorecard report on February 2, 2022 in order to document efforts to advance energy efficiency throughout 2021.<sup>29</sup> A majority of states, including many of Kansas's neighbors in the region, have been making meaningful impacts to their generation portfolios through DSM for years. Kansas continues to fall behind in that regard with the limited DSM options for customers.

27. In the 2022 IRP Update, the preferred portfolio includes DSM as a resource that is valued at the Realistic Achievable Potential ("RAP") from Evergy's Missouri DSM study.<sup>30</sup> The RAP represents the reference case for expected levels of program performance. For Kansas in 2022, Evergy has used the regular RAP values for DSM in Evergy Metro and "RAP-" for Kansas Central, signifying lower-than-anticipated levels of program performance.<sup>31</sup> The current DSM programs were also accounted for in the 2021 IRP Update, and the implication appears to be that Evergy anticipates Kansas DSM programs similar to the level in Missouri to account for DSM as a resource. Aside from the 22-254 Docket, Kansas does not have access to DSM programs on a scale that Evergy has in Missouri or beyond what is already available in the status quo. If avenues to prop up energy efficiency in Kansas are not explored, observers to the Kansas IRP process should be weary of Evergy's strategy of relying upon DSM for any long-term resource planning. Evergy's future IRPs that include DSM as a part of resource modeling should consider providing

---

<sup>28</sup> "The 2020 State Energy Efficiency Scorecard," American Council for an Energy Efficient Economy (December 10, 2020).

<sup>29</sup> "Scorecard Update: Electrification Revs Up as States Advance Climate Action," Somberg, Ben, ACEEE, (February 2, 2022). Accessed at: <https://www.aceee.org/press-release/2022/02/scorecard-update-electrification-revs-states-advance-climate-action>.

<sup>30</sup> *Evergy 2019 DSM Potential Study Final Report*, pg. 6 (May, 28, 2021; Revised June 3, 2021).

<sup>31</sup> *2022 IRP Update* at pg. 83.

the Commission with more definitive information regarding the factors used to support the projected MW values for Kansas. Using new capacity modeling provides unrealistic measurements if there are no means to implement DSM programs or achieve those projections. Without a plan on how to utilize DSM in Kansas, the projected MWs assigned to DSM in Evergy's preferred portfolio in the future may have to be picked up through additional capital investments paid for by ratepayers that are not currently being contemplated by Evergy.

### **Conclusion**

28. CURB believes that the 2022 IRP Update complies with Commission orders and would recommend that the Commission finds the same. CURB offers these comments as part of the continued effort to improve Evergy's resource acquisition strategy that will lead to sufficient and reliable service at the lowest reasonable price. A number of the concerns and issues highlighted by CURB will require continued monitoring and refinement. Further, CURB's silence on any particular aspect of the IRP is not intended to be an indication of support or acquiescence to that aspect. CURB anticipates that all these issues and more will be thoroughly examined in Evergy's anticipated general rate case in 2023.

Respectfully submitted,



---

David W. Nickel, Consumer Counsel #11170  
Joseph R. Astrab, Attorney # 26414  
Todd E. Love, Attorney #13445  
Citizens' Utility Ratepayer Board  
1500 SW Arrowhead Road  
Topeka, KS 66604  
(785) 271-3200  
[d.nickel@curb.kansas.gov](mailto:d.nickel@curb.kansas.gov)  
[j.astrab@curb.kansas.gov](mailto:j.astrab@curb.kansas.gov)  
[t.love@curb.kansas.gov](mailto:t.love@curb.kansas.gov)

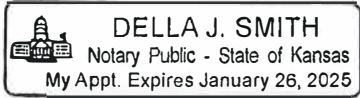
**VERIFICATION**

STATE OF KANSAS                    )  
  )  
COUNTY OF SHAWNEE            )        ss:

I, Joseph R. Astrab, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
Joseph R. Astrab

SUBSCRIBED AND SWORN to before me this 29<sup>th</sup> day of August, 2022.



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

My Commission expires: 01-26-2025.

## CERTIFICATE OF SERVICE

19-KCPE-096-CPL

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 29<sup>th</sup> day of August, 2022, to the following:

DOROTHY BARNETT  
CLIMATE & ENERGY PROJECT  
PO BOX 1858  
HUTCHINSON, KS 67504-1858  
[barnett@climateandenergy.org](mailto:barnett@climateandenergy.org)

JOHN GARRETSON, BUSINESS MANAGER  
IBEW LOCAL UNION NO. 304  
3906 NW 16<sup>th</sup> STREET  
TOPEKA, KS 66615  
[john@garretson304.org](mailto:john@garretson304.org)

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](mailto:cathy.dinges@evergy.com)

KIMBERLY B. FRANK, COUNSEL  
K&L GATES, LLP  
1601 K STREET NW  
WASHINGTON, DC 20006  
[kimberly.frank@klgates.com](mailto:kimberly.frank@klgates.com)

CATHY DINGES, ATTORNEY  
EVERGY METRO, INC D/B/A EVERGY  
KANSAS METRO  
ONE KANSAS CITY PLACE  
1200 MAIN ST., 19<sup>th</sup> FLOOR  
KANSAS CITY, MO 64105  
[cathy.dinges@evergy.com](mailto:cathy.dinges@evergy.com)

NATHAN HOWE  
K&L GATES, LLP  
ONE NEWARK CENTER  
1085 RAYMOND BLVD.  
NEWARK, NJ 07102  
[nathan.howe@klgates.com](mailto:nathan.howe@klgates.com)

ROGER W. STEINER, CORPORATE  
COUNSEL  
EVERGY METRO, INC D/B/A EVERGY  
KANSAS METRO  
ONE KANSAS CITY PLACE  
1200 MAIN ST., 19<sup>th</sup> FLOOR  
KANSAS CITY, MO 64105  
[roger.steiner@evergy.com](mailto:roger.steiner@evergy.com)

TERESA A. WOODY  
KANSAS APPLESEED CENTER FOR LAW  
AND JUSTICE, INC.  
211 E. 8<sup>th</sup> STREET, SUITE D  
LAWRENCE, KS 66044  
[twoody@kansasappleseed.org](mailto:twoody@kansasappleseed.org)

TERRY M. JARRETT, Attorney at Law  
HEALY LAW OFFICES, LLC  
3010 E BATTLEFIELD, SUITE A  
SPRINGFIELD, MO 65804  
[terry@healylawoffices.com](mailto:terry@healylawoffices.com)

BRIAN G. FEDOTIN, GENERAL COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[b.fedotin@kcc.ks.gov](mailto:b.fedotin@kcc.ks.gov)

HEATHER H. STARNES, ATTORNEY  
HEALY LAW OFFICES, LLC  
12 PERDIDO CIRCLE  
LITTLE ROCK, AR 72211  
[heather@healylawoffices.com](mailto:heather@healylawoffices.com)

MICHAEL NEELEY, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[m.neeley@kcc.ks.gov](mailto:m.neeley@kcc.ks.gov)

BRIAN NOLAND  
IBEW LOCAL 304, KANSAS CITY, MO  
117 W. 20<sup>th</sup> ST., STE. 201  
KANSAS CITY, MO 64108  
[noland.brian@gmail.com](mailto:noland.brian@gmail.com)

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@kepcoco.org](mailto:scunningham@kepcoco.org)

MARK DOLJAC, DIR RATES AND  
REGULATION  
KANSAS ELECTRIC POWER CO-OP, INC.  
600 SW CORPORATE VIEW  
PO BOX 4877  
TOPEKA, KS 66604-0877  
[mdoljac@kepco.org](mailto:mdoljac@kepco.org)

REBECCA FOWLER, MANAGER,  
REGULATORY AFFAIRS  
KANSAS ELECTRIC POWER CO-OP, INC.  
600 SW CORPORATE VIEW  
PO BOX 4877  
TOPEKA, KS 66604-0877  
[rfowler@kepco.org](mailto:rfowler@kepco.org)

JAMES GING, DIRECTOR ENGINEERING  
SERVICES  
KANSAS POWER POOL  
100 N BROADWAY, STE L110  
WICHITA, KS 67202  
[jging@kpp.agency](mailto:jging@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)

TIMOTHY J. LAUGHLIN, ATTORNEY  
LONG & ROBINSON, LLC  
1800 BALTIMORE AVENUE, STE 500  
KANSAS CITY, MO 64108  
[tlaughlin@longrobinson.com](mailto:tlaughlin@longrobinson.com)

TIMOTHY S. MAIER, GENERAL MANAGER  
MCPHERSON BOARD OF PUBLIC  
UTILITIES  
401 W KANSAS AVE  
PO BOX 768  
MCPHERSON, KS 67460  
[timmm@mcphersonpower.com](mailto:timmm@mcphersonpower.com)

WILLIAM DOWLING, VP ENGINEERING &  
ENERGY SUPPLY  
MIDWEST ENERGY, INC.  
1330 CANTERBURY DRIVE  
PO BOX 898  
HAYS, KS 67601-0898  
[bdowling@mwenergy.com](mailto:bdowling@mwenergy.com)

PATRICK PARKE, CEO  
MIDWEST ENERGY, INC.  
1330 CANTERBURY RD  
PO BOX 898  
HAYS, KS 67601-0898

[patparke@mwenergy.com](mailto:patparke@mwenergy.com)

ASHOK GUPTA, EXPERT  
NATIONAL RESOURCES DEFENSE  
COUNCIL  
20 N WACKER DRIVE, SUITE 1600  
CHICAGO, IL 60606  
[agupta@nrdc.org](mailto:agupta@nrdc.org)

ANNE E. CALLENBACH, ATTORNEY  
POLSINELLI PC  
900 W 48TH PLACE, STE 900  
KANSAS CITY, MO 64112  
[acallenbach@polsinelli.com](mailto:acallenbach@polsinelli.com)

FRANK A. CARO, ATTORNEY  
POLSINELLI PC  
900 W 48TH PLACE, STE 900  
KANSAS CITY, MO 64112  
[fcaro@polsinelli.com](mailto:fcaro@polsinelli.com)

ANDREW O. SCHULTE, ATTORNEY  
POLSINELLI PC  
900 W 48TH PLACE, STE 900  
KANSAS CITY, MO 64112  
[aschulte@polsinelli.com](mailto:aschulte@polsinelli.com)

ROBERT V. EYE, ATTORNEY AT LAW  
ROBERT V. EYE LAW OFFICE, LLC  
4840 BOB BILLINGS PKWY, STE. 1010  
LAWRENCE, KS 66049-3862  
[bob@kauffmaneve.com](mailto:bob@kauffmaneve.com)

SCOTT L. BROWN  
SCOTT L. BROWN, ATTORNEY  
475 NEW BROTHERHOOD BLDG.  
753 STATE AVENUE  
KANSAS CITY, KS 66101  
[slb@blake-uhlig.com](mailto:slb@blake-uhlig.com)

SUNIL BECTOR, ATTORNEY  
SIERRA CLUB  
2101 WEBSTER, SUITE 1300  
OAKLAND, CA 94312-3011  
[sunil.bector@sierraclub.org](mailto:sunil.bector@sierraclub.org)

TONY MENDOZA  
SIERRA CLUB  
2101 WEBSTER, SUITE 1300  
OAKLAND, CA 94312-3011  
[tony.mendoza@sierraclub.org](mailto:tony.mendoza@sierraclub.org)

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

DAVID RICHARDSON, SR. FINANCIAL  
ADVISOR  
THE COUNCIL FOR THE NEW ENERGY  
ECONOMICS  
1390 YELLOW PINE AVENUE  
BOULDER, CO 80304  
[david.richardson@newenergyeconomics.org](mailto:david.richardson@newenergyeconomics.org)

ROBERT TITUS, ATTORNEY  
TITUS CONNORS, LLC  
6600 W 95<sup>th</sup> STREET, SUITE 200  
OVERLAND PARK, KS 66212  
[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)

FRED WICKHAM  
WICKHAM & WOOD, LLC  
107 W. 9<sup>th</sup> STREET, 2<sup>nd</sup> FLOOR  
KANSAS CITY, MO 64105  
[fred@wickham-wood.com](mailto:fred@wickham-wood.com)

BRIAN WOOD  
WICKHAM & WOOD, LLC  
107 W. 9<sup>th</sup> STREET, 2<sup>nd</sup> FLOOR  
KANSAS CITY, MO 64105  
[brian@wickham-wood.com](mailto:brian@wickham-wood.com)



---

Della Smith  
Senior Administrative Specialist