

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

In the Matter of the Application of]
Every Kansas Central, Inc., and]
Every Kansas South, Inc., for the] Docket No. 25-EKCE-294-RTS
Approval to Make Certain Changes]
in their Charges for Electric Service.]

PREFILED TESTIMONY

OF

JUSTIN WATERS

ON BEHALF OF UNIFIED SCHOOL DISTRICT #259

PUBLIC VERSION

1 **Q: PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 **A:** My name is Justin Waters. My business address is Wichita Public Schools, 3850 N.
3 Hydraulic, Wichita, KS 67219.

4 **Q: PLEASE STATE YOUR OCCUPATION.**

5 **A:** I am a Manager, Building Grounds/Energy Management, for the Wichita Public
6 Schools.

7 **Q: PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**
8 **EXPERIENCE.**

9 **A:** This information is included in Exhibit A to my testimony.

10 **Q: ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?**

11 **A:** I am appearing on behalf of Unified School District #259 (“USD 259”).

12 **Q: HAVE YOU PROVIDED TESTIMONY BEFORE THE KANSAS**
13 **CORPORATION COMMISSION ON A PRIOR OCCASION?**

14 **A:** Yes. I have appeared as a witness before the Kansas Corporation Commission and
15 provided testimony on one prior occasion with respect to utility matters.

16 **Q: WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS**
17 **PROCEEDING?**

18 **A:** I investigated USD 259’s electric demand curve on peak days and at peak times to
19 determine what contribution and/or influence USD 259’s Kindergarten-12th Grade (“K-12”)
20 sites have on Evergy’s system peak as identified in Evergy’s Application in this Docket.
21 USD 259 is concerned that it is subsidizing other electric users when USD 259’s usage and
22 peaks are compared to Evergy’s system peaks as identified during the Test Year.

1 **Q: PLEASE SUMMARIZE YOUR INVESTIGATION.**

2 **A:** I reviewed data sourced from USD 259's commercial grade energy monitoring
3 system, known as Power Monitoring Expert, which is an energy monitoring software utilized
4 by USD 259 to track energy consumption across building sites in the district. I am presenting
5 USD 259's energy data in this Docket which compares Evergy's system peaks to USD 259's
6 demand on peak days in the 4 months used in Evergy's four coincidental peak ("4CP")
7 calculation of demand.

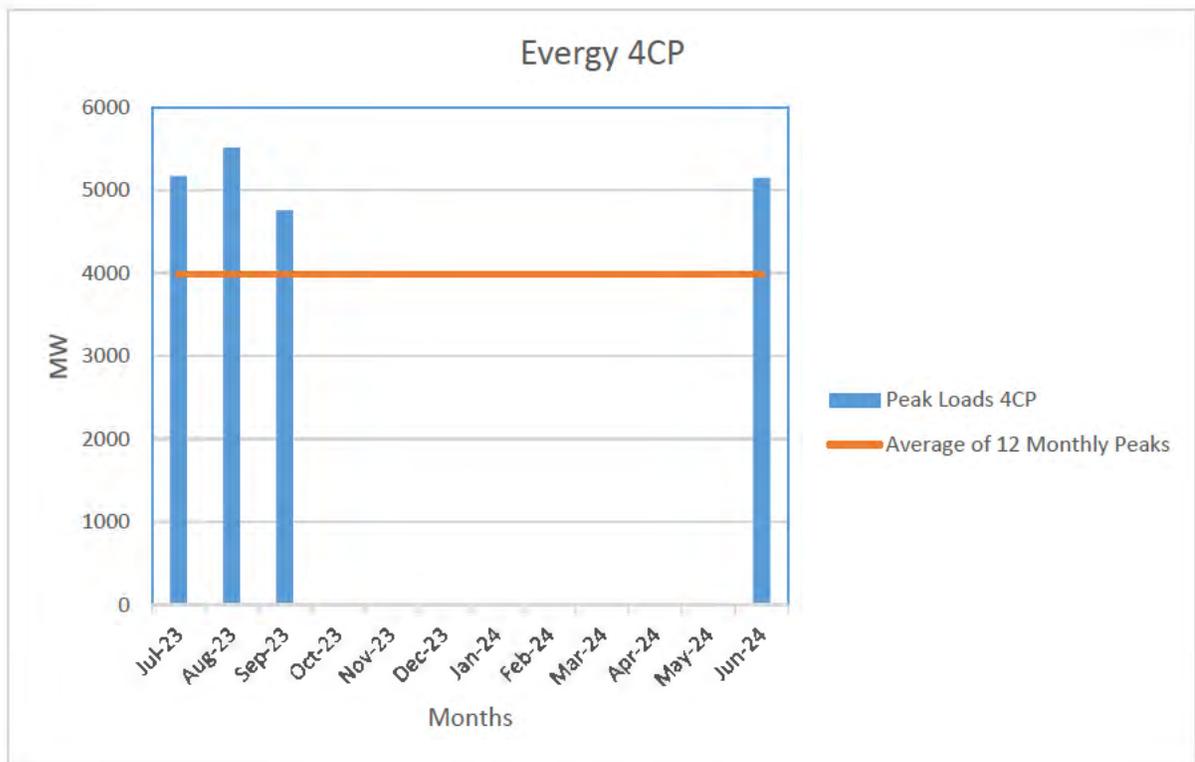
8 **Q: WHAT METHODOLOGY DID YOU USE FOR YOUR INVESTIGATION?**

9 **A:** I used the simplest method to analyze the data received and compare results.
10 Specifically, I used data provided by Evergy in Data Request responses, and data obtained
11 from USD 259's Power Monitoring Expert software. Once I pulled the demand data from
12 Power Monitoring Expert, I compared Evergy bills to Kilowatt hour ("KWH") readings in
13 Power Monitoring Expert to make sure only valid data was utilized in the comparison. Then,
14 I aggregated the demands for those USD 259 meters together and compared the data to the
15 peak demands provided by Evergy in response to USD 259's Data Request 1-1.

16 **Q: WHAT DID YOUR INVESTIGATION REVEAL?**

1 **A:** Noted in Table 1 below, I started with data provided by Evergy. Evergy's 12 monthly
2 system peaks are averaged and shown as an orange line in Table 1, and Evergy's system
3 peaks in the 4CP months are shown in the four blue bars in Table 1.

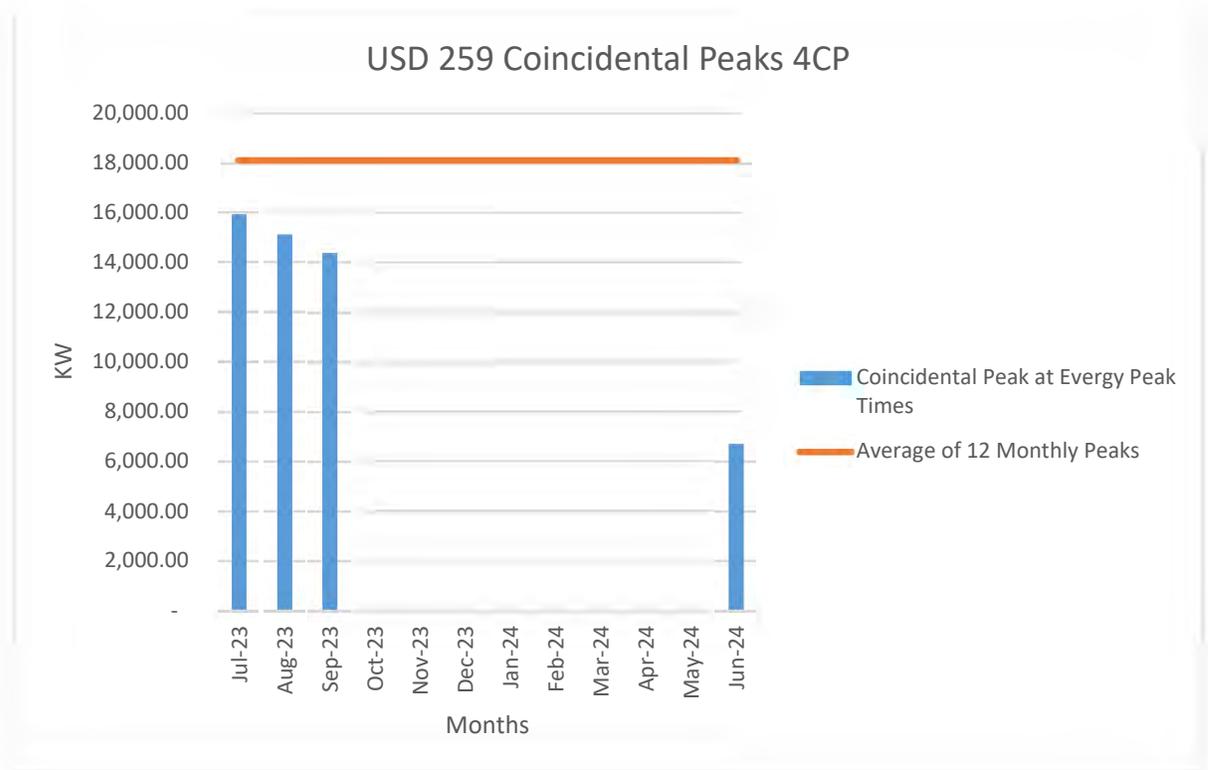
4 Table 1



5

1 Next, I determined USD 259's 12 monthly peaks from the customer specific data I
2 pulled from Power Monitoring Expert and calculated USD 259's average use which is shown
3 as an orange line in Table 2, and USD 259's peaks in the 4CP months at the time Evergy
4 reported its peaks as shown in the four blue bars of Table 2. Table 2 demonstrates that when
5 Evergy's system demand is peaking, USD 259's electric demand is below average. USD
6 259's specific demand on Evergy's system is turning down when Evergy's system wide
7 demand is ramping up.

8 Table 2



9

1 Table 3 reflects USD 259's demand curve from June 2023 and June 2024. June 2023
2 is the red line in Table 3 and June 2024 is the blue line. Table 4 reflects USD 259's demand
3 curve from July 2023 (red line) and July 2024 (blue line). Table 5 reflects USD 259's demand
4 curve from August 2023 (red line) and August 2024 (blue line). Table 6 reflects USD 259's
5 demand curve from September 2023 (red line) and September 2024 (blue line). This data
6 demonstrates that USD 259's demand is declining by the 5PM hour. Evergy's Response to
7 USD 259's Data Request 1-1 indicates the 5PM (1700) hour is Evergy's system peak for the
8 4CP. Evergy's peak demand is reflected in Tables 3-6 as the two bold lines on top of USD
9 259's curve. Tables 3-6 again demonstrate that USD 259's usage is peaking outside Evergy's
10 peak demand. And then USD 259's demand on Evergy's system is turning down when
11 Evergy's system demand from other electric users is ramping up.

Table 3

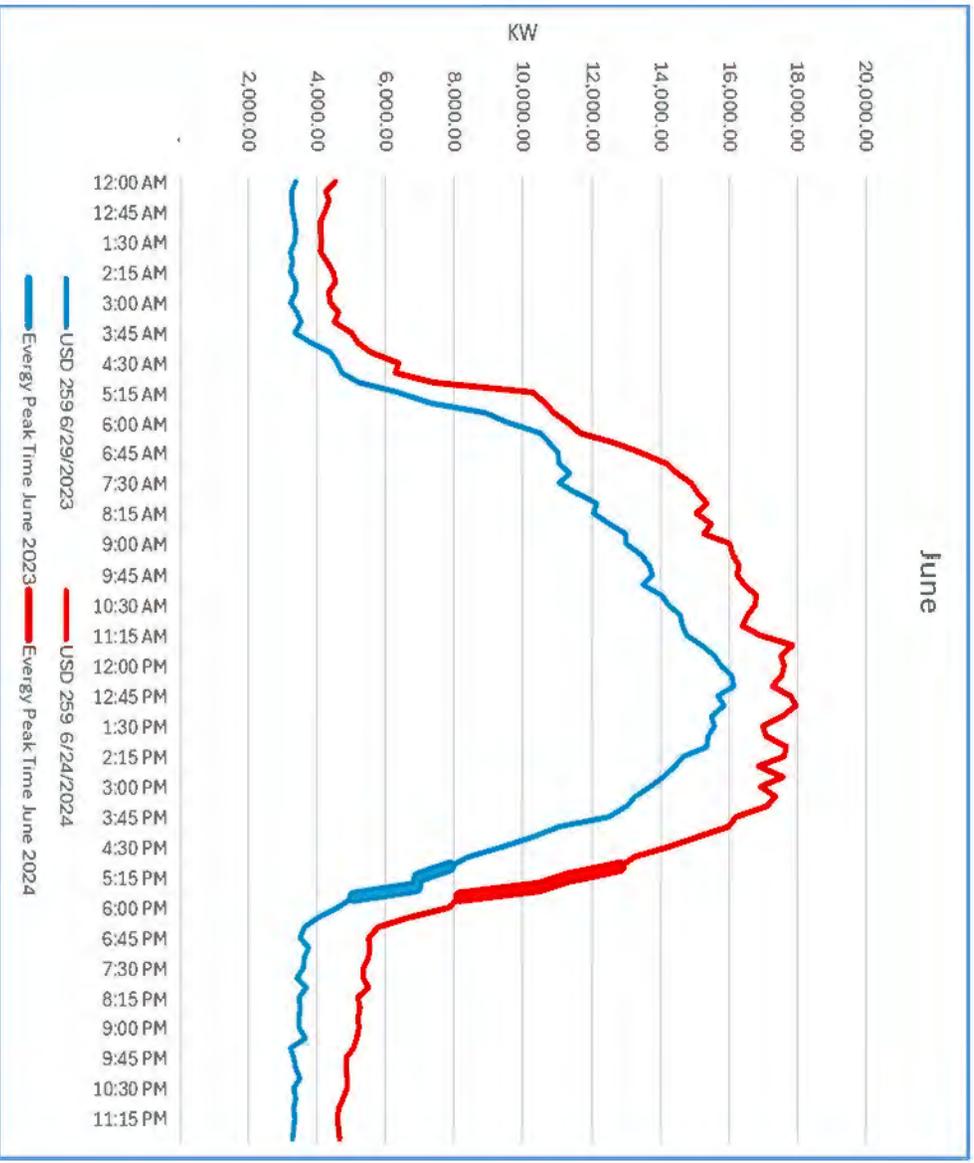


Table 4

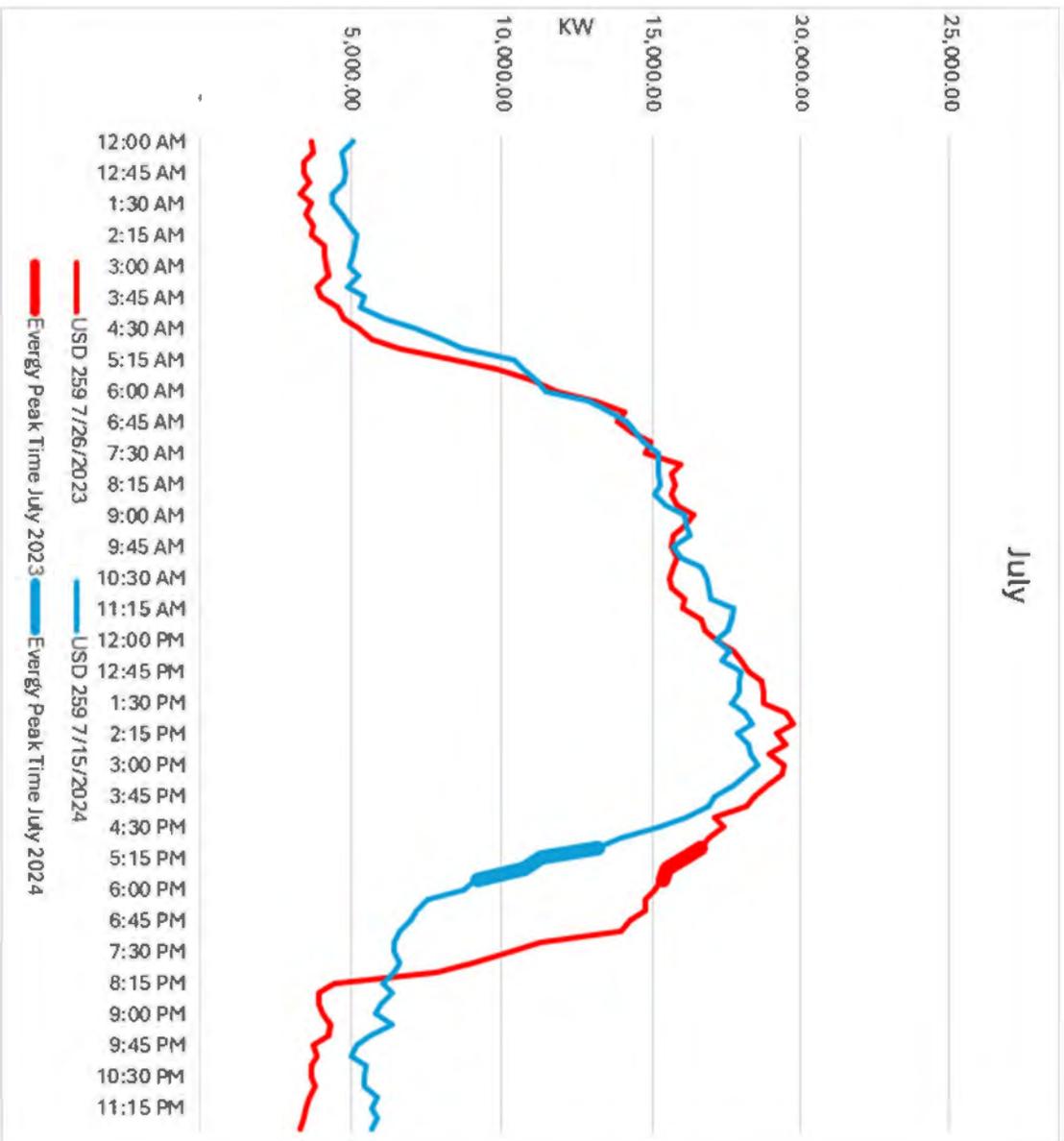
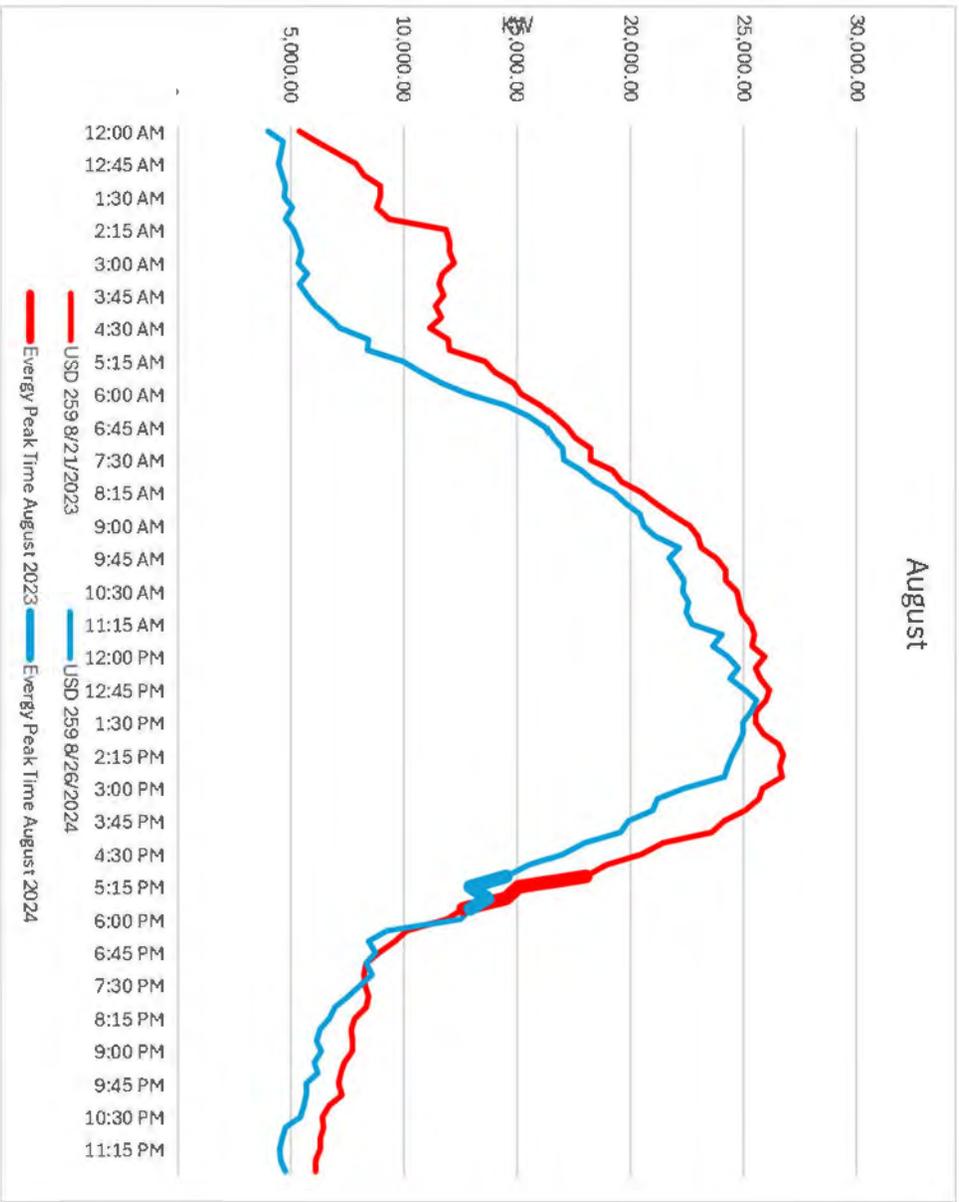
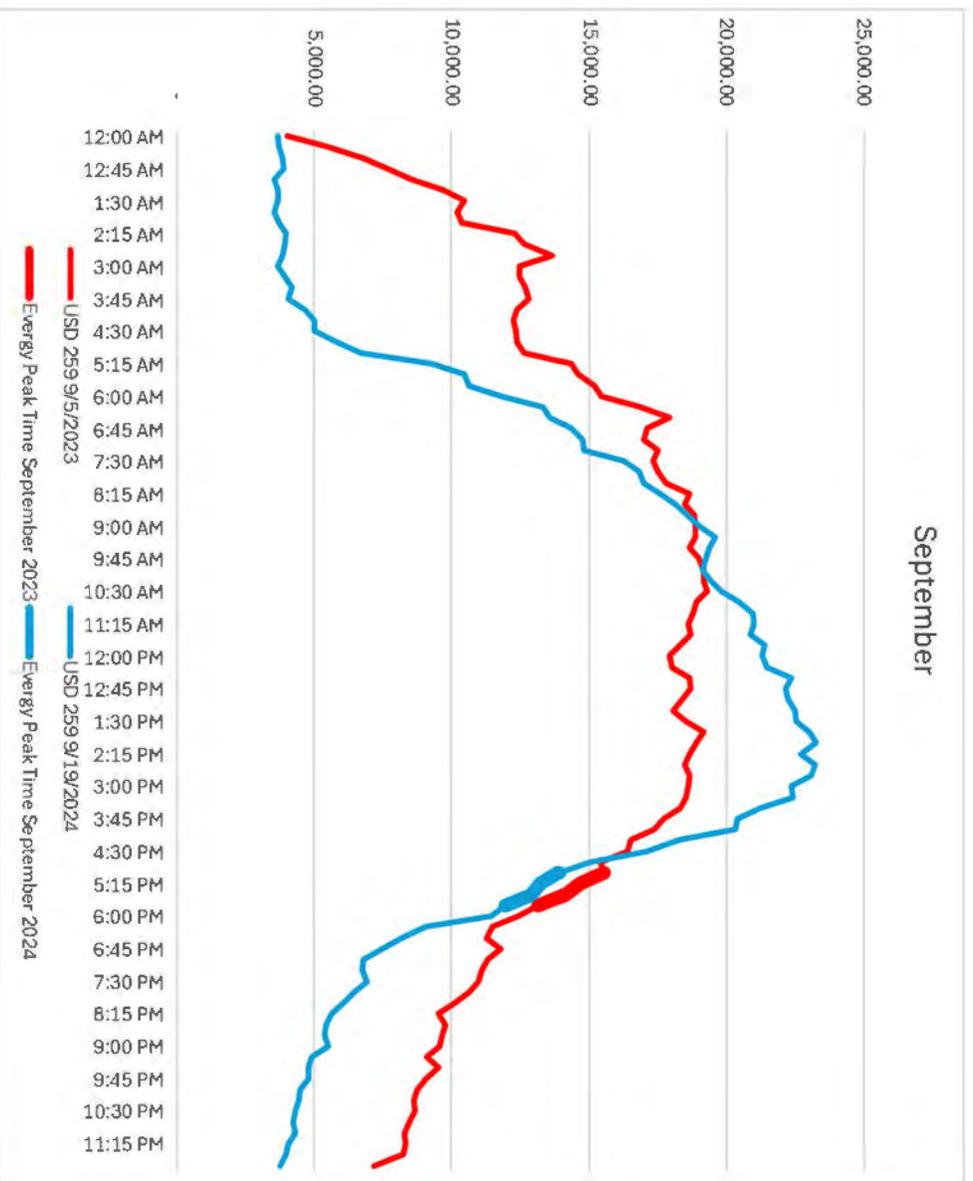


Table 5



1

Table 6



2

3 **Q: BASED ON THE DATA REFLECTED IN TABLES 1-6, WHERE DOES**
4 **USD 259 FALL IN COMPARISON TO EVERGY'S PEAK SYSTEM LOAD?**

5 **A:** USD 259's demand is declining as Evergy's system peak is increasing in the months
6 used by Evergy in its 4CP. In other words, USD 259 is not contributing to Evergy's system
7 peak during this timeframe. Even more broadly, Evergy's responses to USD 259's Data
8 Requests indicate the Schools Class of customers (meaning customers under the Restricted
9 Educational Tariff, Standard Educational Tariff and All Electric Tariff) pay a greater
10 percentage of Evergy's revenue than the KWHs the Schools Class of customers consume.

1 The Schools Class of customers consumed 3.27% of Evergy’s total system during the Test
2 Year. (Response to USD 259’s Data Request 2-2). The current revenue produced by KWH
3 sales to the Schools Class for the Test Year was \$29,686,156.05, not including customer
4 charge or demand charge revenue. (Response to USD 259’s Data Request 2-3). Based on
5 Evergy’s Class Cost of Service, the Schools Class Test Year revenue was 3.63% of the Net
6 Revenue Requirement for the jurisdiction. (Response to USD 259’s Data Request 2-4).

7 **Q: IS IT REASONABLE TO ASSUME OTHER K-12 INSTITUTIONS RUN ON**
8 **THE SAME DAY-TO-DAY DEMAND SCHEDULES?**

9 **A:** Yes. USD 259 has had an energy monitoring program for approximately 25 years and
10 the management team’s goal is to manage electric usage in a smart way in order to both
11 conserve energy and limit unnecessary increased electric costs outside of the regular school day.
12 Generally, schools in the Evergy Kansas Central territory operate on a 7AM to 4PM schedule.
13 USD 259 specifically has sites that run from 7AM to 2PM, some sites that run 8AM to 3PM,
14 and some sites that run 9AM to 4PM. Some sites do have latchkey programs and sporting
15 events, and no sites are identical; however, K-12 electric demand overall is declining later in
16 the day as demonstrated by comparing Evergy’s data to USD 259’s data. In Evergy’s response
17 to USD 259’s Data Request 1-1, all three years of 4CP data shows the hour of greatest demand
18 is at the 5PM (1700) hour, which is when USD 259 electric demand is declining as
19 demonstrated in Table 3.

20 **Q: WHAT ARE YOU ASKING THE COMMISSION TO CONSIDER IN THIS**
21 **DOCKET?**

1 **A:** The data in my testimony demonstrates that USD 259 is already paying more than its
2 fair share of electric rates based on USD 259's peak usage and contribution to Evergy's system
3 demand. Further, higher utility rates put USD 259 at a disadvantage and takes resources from
4 classrooms as explained in the testimony of USD 259's Chief Financial Officer, Addi Lowell.
5 The shifting of resources from the classroom to pay for rising utility costs negatively impacts
6 USD 259's ability to educate students and hire and retain staff. The Commission should make
7 every effort to mitigate any increases charged to schools.

8 **Q: PLEASE SUMMARIZE YOUR TESTIMONY.**

9 **A:** USD 259's total electric bill for the Test Year was [REDACTED] as provided by
10 Evergy in response to USD 259's Data Request 2-5. What Evergy is asking for in this docket
11 will have a significant negative impact on USD 259's ability to educate children and provide
12 jobs in the Wichita area. My testimony demonstrates that USD 259 as a rate payor has and
13 continues to pay more than its fair share of energy costs.

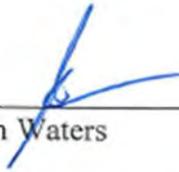
14 **Q: DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

15 **A:** Yes, it does.

VERIFICATION

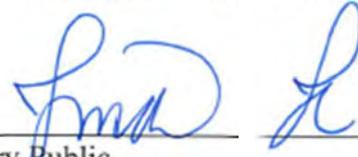
STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

Justin Waters, of lawful age, being first duly sworn upon my oath, state that I am the Manager, Building Grounds/Energy Management of Wichita Public Schools; that I have read the Prefiled Testimony of Justin Waters on Behalf of Unified School District #259; that I know the contents thereof and declares that the statements made therein are mine and true and correct to the best of my knowledge and belief.

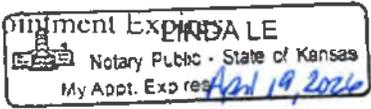


Justin Waters

SUBSCRIBED AND SWORN to before me this 6th day of June, 2025.



Notary Public

My Appointment Expires **EXPIRES**
 Notary Public - State of Kansas
My Appt. Expires April 19, 2026

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 6th day of June, 2025, to the following:

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/s/ Kacey S. Mayes
Kacey S. Mayes, #28224

Exhibit A: QUALIFICATIONS OF JUSTIN WATERS

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Justin Waters. My business address is Wichita Public Schools, 3850 N. Hydraulic, Wichita, KS 67219.

Q PLEASE STATE YOUR OCCUPATION.

A I am a Manager, Building Grounds/Energy Management, for the Wichita Public Schools.

Q PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.

A I began working as a Manager, Building Grounds/Energy Management in June of 2025, prior to that I served as a Technician, Energy Management, for the Wichita Public Schools from January of 2018 to June of 2025. Prior to that date, I served as Supervisor of Electrical Projects for the Wichita Public Schools from February 2006 through January of 2018. I received a Certified Energy manager Certification in May of 2021 and a Certified Energy Procurement Professional Certification in April of 2023 and I have been a Master Electrician since 2005. In my current position as a Manager, Building Grounds/Energy Management, I am responsible for the Energy Management Department its budget and 17 other shops that directly impact the facilities and students at Wichita Public Schools.