# BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Investigation into the ) Sustainability Transformation Plan of ) Evergy Metro, Inc., Evergy Kansas Central, ) Inc. and Evergy South, Inc. (collectively ) Evergy). )

Docket No. 21-EKME-088-GIE

# MOTION FOR ADMISSION OF HEATHER H. STARNES <u>PRO HAC VICE</u>

Pursuant to Kansas Supreme Court Rule 116, I, Terry M. Jarrett, an attorney for

McPherson Board of Public Utilities ("McPherson BPU"), moves that Heather H. Starnes of

Healy Law Offices be admitted to practice before the State Corporation Commission of the State

of Kansas ("Commission") for purposes of this case only.

I certify that I am a member in good standing of the Kansas bar. In compliance with

Supreme Court Rule 116(a), I will sign all pleadings and other papers which are filed before the

Commission. I also will be actively engaged in the case and be present for all appearances, to

the extent required by the Commission.

Pursuant to Supreme Court Rule 116(c), I have attached the Affidavit of Heather H. Starnes in support of this motion.

Respectfully submitted,

<u>/s/ Terry M. Jarrett</u> Terry M. Jarrett – Kansas Bar No. 27782 HEALY LAW OFFICES, LLC 514 East High Street, Suite 22 Jefferson City, MO 65101 (573) 415-8379 terry@healylawoffices.com

#### **VERIFICATION**

STATE OF MISSOURI ) ) ss: COUNTY OF COLE )

I, Terry M. Jarrett, verify under penalty of perjury that I have caused the foregoing Entry of Appearance to be prepared on behalf of McPherson Board of Public Utilities; that I have read and reviewed the Motion for Admission of Heather H. Starnes Pro Hac Vice; and that the contents thereof are true and correct to the best of my information, knowledge, and belief.

> <u>/s/ Terry M. Jarrett</u> Terry M. Jarrett

Executed on September 11, 2020.

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of September, 2020, a true and correct copy of the above and foregoing was sent electronically to the following:

Joseph R. Astrab Todd E. Love David W. Nickel Shonda Rabb Della Smith Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 j.astrab@curb.kansas.gov t.love@curb.kansas.gov d.nickel@curb.kansas.gov s.rabb@curb.kansas.gov d.smith@curb.kansas.gov

John Garretson IBEW Local Union No.304 3906 NW 16<sup>th</sup> Street Topeka, KS 66615 johng@ibew304.org Cathryn J. Dinges Evergy Kansas Central, Inc. 818 South Kansas Avenue P.O. Box 889 Topeka, KS 66601-0889 Cathy.Dinges@evergy.com

Robert J. Hack Roger W. Steiner Evergy Metro, Inc. One Kansas City Place, 1200 Main Street 19<sup>th</sup> Floor Kansas City, MO 64105 <u>Rob.Hack@evergy.com</u> <u>roger.steiner@evergy.com</u> Brian G. Fedotin Michael Neeley Terri Pemberton Kansas Corporation Commission 1500 SW Arrrowead Road Topeka, KS 66604 <u>b.fedotin@kcc.ks.gov</u> <u>m.neeley@kcc.ks.gov</u> <u>t.pemberton@kcc.ks.gov</u>

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Amy Fellows Cline Timothy E.McKee Triplett, Woolf & Garretson, LLC 2959 North Rock Road, Ste. 300 Wichita, KS 67226 amycline@twgfirm.com temckee@twgfirm.com

Brian Wood Wickham & Wood,LLC 107 West 9<sup>th</sup> Street, 2<sup>nd</sup> Floor Kansas City, MO 64105 <u>brian@wickham-wood.com</u> Susan B. Cunningham Mark Doljac Rebecca Fowler Kansas Electric Power Co-op, Inc. 600 SW Corporate View P.O. Box 4877 Topeka, KS 66604-0877 <u>scunningham@kepco.org</u> <u>mdoljac@kepco.org</u> rfowler@kepco.org

Robert E. Vincent James P. Zakoura Smithyman & Zakoura, CHTD. 7400 West 110<sup>th</sup> Street, Ste. 750 Overland Park, KS 66210-2362 <u>robert@smizak-law.com</u> jim@smizak-law.com

Thomas R. Powell Unified School District 259 201 North Water Street, Room 405 Wichita, KS 67202-1292 tpowell@usd259.net

/s/ Terry M. Jarrett Terry M. Jarrett

# BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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In the Matter of the Investigation into the Sustainability Transformation Plan of Evergy Metro, Inc., Evergy Kansas Central, Inc. and Evergy South, Inc. (collectively Evergy).

Docket No. 21-EKME-088-GIE

# AFFIDAVIT IN SUPPORT OF MOTION FOR ADMISSION OF HEATHER STARNES PRO HAC VICE

Heather Starnes, being duly sworn upon her oath, deposes and says:

1. I represent the McPherson Board of Public Utilities ("McPherson BPU"), which is

filing an Entry of Appearance in the above-referenced docket concurrently with the Motion for

Admission of Heather Starnes Pro Hac Vice.

2. McPherson BPU's local counsel for this proceeding is Terry M. Jarrett, whose

contact information is as follows:

Terry M. Jarrett HEALY LAW OFFICES, LLC 514 East High Street, Suite 22 Jefferson City, MO 65101 (573) 415-8379 terry@healylawoffices.com

3. My residential address, business address, and telephone number are as follows:

Residential Address:	12 Perdido Circle Little Rock, AR 72211
Business Address:	12 Perdido Circle Little Rock, AR 72211
Business Phone: Fax: Email:	(501) 516-0041 (417) 864-7018 heather@healylawoffices.com

4. I am admitted to and a member in good standing of the bar of the State of

Missouri, being admitted in 2001. My state bar number is 52608. I am also admitted to and a

member in good standing of the bar of the State of Arkansas, having been admitted in 1994. My state bar number is 94113.

5. I am not currently, nor have I ever been, the subject of public discipline, including, but not limited to, suspension or disbarment, in any jurisdiction.

6. I was previously admitted pro hac vice to appear before the Commission In the Matter of the Application of Prairie Land Electric Cooperative, Inc. Seeking Commission Approval to Update its Local Access Delivery Service Tariff Pursuant to the 34.5kV Formula Based Plan Approved in Docket No. 16-MKEE-023-TAR, Docket No. 17-PLCE-478-TAR; In the Matter of a General Investigation for the Purpose of Investigating Whether Annual or Periodic Cost/Benefit Reporting by SPP and Kansas Electric Utilities that Participate in SPP is in the Public Interest, Docket No. 17-SPPE-117-GIE; In the Matter of the Application of Prairie Land Electric Cooperative, Inc. Seeking Commission Approval to Update its Local Access Delivery Service Tariff Pursuant to the 34.5kV Formula Based Rate Plan Approved in Docket No. 16-MKEE-023-TAR, Docket No. 19-PLCE-436-TAR; In the Matter of the Application of The Victory Electric Cooperative Association, Inc. Seeking Commission Approval to Update its Local Access Delivery Service Tariff Pursuant to the 34.5kV Formula Based Rate Plan Approved in Docket No.19-VICE-448-TAR; In the Matter of the Application of Western Cooperative Electric Association, Inc. Seeking Commission Approval to Update its Local Access Delivery Service Tariff Pursuant to the 34.5kV Formula Based Rate Plan Approved in Docket No.19-WSTE-443-TAR; In the Matter of the Southern Pioneer Electric Company for Approval of the Continuation of its Debt Service Coverage and 34.5 kV Formula Based Ratemaking Plans Approved in Docket No. 19-SPEE-240-MIS; In the Matter of the Application of Prairie Land Electric Cooperative, Inc. Seeking Commission Approval to Update its Local

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Access Delivery Service Tariff Pursuant to the 34.5kV Formula Based Rate Plan Approved in Docket No. 16-MKEE-023-TAR, Docket 20-PLCE-434-TAR; In the Matter of the Application of The Victory Electric Cooperative Association, Inc., Seeking Commission Approval to Update its Local Access Delivery Service Tariff Pursuant to the 34.5kV Formula Based Rate Plan Approved in Docket No. 16-MKEE-023-TAR, Docket 20-VICE-437-TAR; In the Matter of the Application of Western Cooperative Electric, Inc. Seeking Commission Approval to Update its Local Access Delivery Service Tarifff Pursuant to the 34.5kV Formula Based Rate Plan Approved in Docket No. 16-MKEE-023-TAR, Docket 20-WSTE-440-TAR; In the Matter of the Joint Access Delivery Service Tarifff Pursuant to the 34.5kV Formula Based Rate Plan Approved in Docket No. 16-MKEE-023-TAR, Docket 20-WSTE-440-TAR; In the Matter of the Joint Application of Sunflower and Southern Pioneer for the Approval of an Updated 34.5 kV Loss Factor in the Local Access Delivery Service Tariff, Docket 21-SEPE-047-TAR; and In the Matter of the Joint Application of Sunflower Electric Power Corporation, Prairie Land Electric Cooperative, Inc., The Victory Electric Cooperative Association, Inc., and Western Cooperative Electric Association, Inc., for Approval of Continuation of 34.5 kV Formula-Based Rates and Updated 34.5 kV Loss Factors, Docket 21-SEPE-049-TAR.

FURTHER AFFIANT SAYETH NOT.

### **VERIFICATION**

STATE OF ARKANSAS ) ) ss: COUNTY OF PULASKI )

Heather Starnes, of lawful age, being first duly sworn upon her oath, states that:

She is one of the attorneys in KCC Docket No. 21-EKME-088-GIE; she has read the foregoing Affidavit in Support for Admission of Heather Starnes *Pro Hac Vice*, and upon information and belief, states that the matters therein appearing are true and correct.

futher F her Starnes

Jatricia Hendrip Notary Public

My appointment expires:

Ingust 2, 2022

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	PULLER COULTY

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of September, 2020, a true and correct copy of the above and foregoing was sent electronically to the following:

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Robert J. Hack Roger W. Steiner Evergy Metro, Inc. One Kansas City Place, 1200 Main Street 19<sup>th</sup> Floor Kansas City, MO 64105 <u>Rob.Hack@evergy.com</u> <u>roger.steiner@evergy.com</u>

Susan B. Cunningham Mark Doljac Rebecca Fowler Kansas Electric Power Co-op, Inc. 600 SW Corporate View P.O. Box 4877 Topeka, KS 66604-0877 <u>scunningham@kepco.org</u> <u>mdoljac@kepco.org</u> <u>rfowler@kepco.org</u>

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/s/ Terry M. Jarrett

Terry M. Jarrett