Exhibit No.:	
Issue:	Class Cost of Study, Revenue Allocation, Rate Design
Witness:	Kavita Maini
Type of Exhibit:	Cross-Answering Testimony
Sponsoring Parties:	Walmart Inc. and CCPS
Case No.:	Transportation, LLC
Date Testimony	25-EKCE-294-RTS
Prepared:	June 20, 2025

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. for Approval to Make Certain Changes in their Charges for Electric Service pursuant to K.S.A. 66-117	**)**	**File No. 25-EKCE-294-RTS**

Cross-Answering Testimony and Schedules of

Kavita Maini

PUBLIC VERSION

On behalf of

Walmart Inc. and CCPS Transportation, LLC

June 20, 2025

Protecting Your Bottom Line

KM ENERGY CONSULTING, LLC

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TABLE OF CONTENTS

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Cross-Answering Testimony of Kavita Maini

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Kavita Maini. My office is located at 961 North Lost Woods Road, Oconomowoc, WI 53066.

Q. Are you the same Kavita Maini that previously filed Direct Testimony in this case?

A. Yes. I filed direct testimony on behalf of Walmart Inc. ("Walmart") and CCPS Transportation, LLC ("CCPS") on June 6, 2025, in this case. Walmart takes service from Evergy Kansas Central ("EKC" or "Company") on its Medium General Service ("MGS") rate schedule at the secondary voltage service level while CCPS takes service from the Company on its Large General Service ("LGS") rate schedule at the transmission voltage service level. My direct testimony provided recommendations regarding the Company's: (a) class cost of service study ("COSS"); (b) an appropriate allocation approach for any rate change; and (c) rate design for the MGS and LGS rate schedules.

Q. What is the purpose of your cross-answering testimony?

A. The purpose of my cross-answering testimony is to respond to the following witnesses that testified on COSS, revenue allocation or rate design issues:

COSS

Kansas Corporation Commission Staff's ("Staff") witness Ms. Kristina Frey;

Citizen's Utility Ratepayer Board ("CURB") witness Mr. Glenn Watkins;

Revenue Allocation

Staff witness Ms. Lana Ellis;

CURB witness Mr. Glenn Watkins

Commercial Intervenors' witness Mr. Brian Andrews[1]

Rate Design

Kroeger Company witness Mr. Jared Robertson

Commercial Intervenors' witness Mr. Brian Andrews

Q. Does the fact that you may not address an issue or position advocated by other parties indicate your support?

A. No. The fact that an issue is not addressed herein or in related filings should not be construed as an endorsement of, agreement with, or consent to any filed position.

II. CLASS COST OF SERVICE ("COSS")

A. Staff Classification and Allocation of Fixed Production Plant Related Costs

Q. What is Staff's proposed method to classify and allocate fixed production plant?

[11] Commercial Intervenors includes: Associated Purchasing Services, Cargill, Incorporated, CVR Refining CVL, LLC, Goodyear Tire & Rubber Company, Kansas Agribusiness Retailers Association, Kansas Biofuels Association, Kansas Grain and Feed Association, Lawrence Paper Company, Occidental Chemical Corporation, and Spirit AeroSystems, Inc.

A. A review of Ms. Kristina Frey's direct testimony and related workpapers show that Staff utilizes peak and average ("P&A") methodology for classifying fixed production plant related investment. Based on the system load factor, Staff classified 49.1% as energy related and 50.9% as demand related. The amount classified as energy related was allocated on the basis of the class share of energy consumption at generation and the amount classified as demand related was allocated on the basis of the 4CP allocator.

Q. Do you support the P&A approach?

A. No. Unlike the Average and Excess Demand (AED) methodology employed by the Company, the P&A methodology has a double counting problem because the allocator results in counting average demand (or energy) twice – once when calculating the average portion and then again as a component or subset of 4CP. The "double counting" within the P&A method has been recognized by other Commission's to make the method unreliable. For example, in a past case in Missouri, the Commission there described double counting by comparing the AED and P&A methods as follows:[2]:

> 13. To recognize that pattern of usage, the Average and Excess method separately allocates energy cost based on the average usage of the system by the various customer classes. It then allocates the excess *(emphasis added)* of the system peaks to the various customer classes by a measure of that class' contribution to the peak. In other words, the average and excess costs are each allocated to the customer classes once. *(emphasis added)*
>
> 14. The Peak and Average method, in contrast, initially allocates average costs to each class, but then, instead of allocating just the excess of the peak usage period to the various classes to the cost causing classes, the method reallocates the entire peak usage to the classes that contribute to the peak. Thus, the classes that contribute a large amount to the average usage of the system but add little to the peak, have their average usage allocated to them a second time. Thus,

[2] *See In the Matter of Union Electric Company d/b/a AmerenUE's Tariffs to Increase its Annual Revenues for Electric Service*, Mo PSC Case No. ER-2010-0036, Report and Order, p. 85.

the Peak and Average method double counts the average system usage, *(emphasis added)* and for that reason is unreliable.

Based on the above cited concerns, I am not supportive of Staff's use of the P&A method to classify and allocate fixed production plant related costs.

Q. Did Staff point out any flaws or reasons why the Company's AED 4CP method is not reasonable?

A. No. Staff did not provide any explanation as to why the Company's methodology was not reasonable in the first instance and nor was rationale provided as to why an alternative was necessary.

B. Staff Classification of Distribution Plant Related Costs

Q. What is Staff's proposed approach to classifying distribution plant related costs booked under FERC accounts 364-368?

A. Distribution plant related costs booked under FERC accounts 364-368 consists of poles towers and fixtures, overhead and underground conductor and devices, underground conduit and line transformers. Staff classifies all the costs associated with these items as 100% demand related.

Q. Do you support Staff's approach?

A. No. I am not supportive of Staff's approach because it fails to recognize that the distribution network serves a dual purpose of serving demand needs and providing customers with access to the grid. Infrastructure is needed to provide access to the grid before electricity can flow into the distribution network. Since Staff's method fails to recognize the dual purpose of the distribution networks by classifying all costs as demand related, this method deviates from cost causation.

Instead, the Company's approach reasonably follows cost causation as it utilizes the minimum size distribution methodology, which is a long established approach,

widely used by utilities and recognized in the NARUC manual. I support this approach as it recognizes the basic premise that that the distribution system exists to serve a dual purpose: 1) being capable of delivering service to customers' residences or businesses (customer costs), and 2) ensuring that the distribution system is large enough to provide reliable service (demand costs).

C. CURB Production Plant related classification and allocation of costs

Q. Does CURB support the Company's AED4CP methodology for classifying and allocating fixed production plant related costs?

A. No. A review of CURB's witness Mr. Glenn Watkins' testimony suggests that he opposes the Company's approach for two main reasons:

First, he has issues with the manner in which the Company has applied the AED approach.

Second, he asserts that energy is not given weight in the Company's AED approach.

I will respond to each of these concerns below.

Q. What is Mr. Watkins' concern about how the Company applied the AED method?

A. Mr. Watkins points to the NARUC manual to explain that in the AED method, non-coincident peaks ("NCP") should be utilized instead of the coincident peaks ("CP").

Q. How do you respond to this concern?

A. Based on my experience in participating in the Company's rate cases in Missouri where the same method is applied, it is my understanding that the reason the Company utilizes the coincident peaks is directly tied to the sizing of its production investment decisions being driven by system peaks in the summer. Further, as it relates to the EKC system profile, there is not a material difference between using 4NCP or 4CP to calculate the excess demand.

Q. What is the impact of using 4NCP instead of 4CP in the calculation?

A. Figure 1 shows the comparison of the production cost allocators using the 4NCP versus the 4CP demands. In my view, the allocator differentials are substantially similar and would not materially change the COSS results for the major classes.

Figure 1: Comparison of AED 4NCP v. AED 4CP Allocators

Class	AED 4NCP	AED 4CP
Residential Total	46.19%	47.31%
Residential DG	0.43%	0.19%
Small General Service Total	17.96%	18.63%
Medium General Service Total	10.32%	10.25%
Large General Service Total	13.11%	13.18%
Large Power Service Total	2.06%	2.07%
Educational Services Total	3.99%	3.74%
Restricted Time of Day Service	0.18%	0.12%
Special Contracts	4.51%	3.78%
Interruptible Contract Service	0.24%	0.04%
Large Tire Manufacturer	0.39%	0.39%
EV Total	0.04%	0.03%
Lighting Total	0.58%	0.28%

For instance, Figure 2 below shows a comparison of the rates of return ("ROR") and relative ROR at present rates between the Company's AED 4CP and the AED 4NCP for the major classes. As can be observed, the results reinforce that the differences for the classes are not material and do not alter the conclusions.

Figure 2: ROR and Relative ROR at Present Rates for AED 4NCP v. AED 4CP Allocation

	Company's AED4CP		AED4NCP	
Class	ROR	Relative ROR	ROR	Relative ROR
Residential Total	2.14%	0.39	2.32%	0.43
Small General Service Total	9.36%	1.72	9.85%	1.81
Medium General Service Total	11.59%	2.13	11.47%	2.11
Large General Service Total	11.42%	2.10	11.51%	2.12
Large Power Service Total	0.07	1.27	7.01%	1.29
Lighting Total	20.03%	3.69	16.46%	3.03
Total	5.43%		5.43%	

Therefore, use of the AED4CP remains reasonable and appropriate for EKC's system profile and characteristics in this case.

Q. Do you agree with Mr. Watkins' assertions that virtually no weight is given to energy or average demand in the Company's AED 4CP method?

A No. The Company's calculations for AED 4CP show an average demand component and an excess demand component for each class. The average demand for each class is calculated as energy consumption divided by the hours in a year for each class. The percent share of each class's average of the total is then weighted by the system load factor. I have highlighted the Company's calculations associated with average demand (or energy) in Schedule KM-1R.

Q. Did Mr. Watkins provide alternative options to the Company AED 4CP method for allocating fixed production plant related costs?

A Yes. Mr. Watkins included the P&A method, Base Intermediate Peak (BIP) method and coincident peak using class contribution to twelve peaks ("12CP") respectively.

Q. In your view, do these methods reasonably follow cost causation?

A. No. I already discussed the issues associated with the P&A approach earlier. As for the BIP method, Mr. Watkins fails to apply the production stacking approach to base, intermediate and peak loading hours as described in the NARUC manual.[3] His approach also results in ignoring the capacity value associated with generation. For instance, he assigns 0% capacity value to the Wolf Creek nuclear plant. However, this assumption is flawed because the Company utilizes accredited capacity from all of the baseload plants to satisfy its capacity margin obligations at Southwest Power Pool ("SPP").

[3] See page 60 of the NARUC manual which describes that units are ranked from lowest to highest costs and where they fall on the stack determines the assignment to the base, intermediate or on peak loading hours. Based on a review of his testimony, I do not observe the assignment to the base, intermediate and on peak loading hours.

Further, participation in the SPP makes it challenging to properly classify generation plants as fulfilling base, intermediate or peak load requirements. In my view, therefore, the BIP method is not reliable and should not be relied upon, for revenue allocation purposes.

Regarding the 12CP method proposed by Mr. Watkins, EKC's system peak demands show that it is a summer peaking utility. Figure 1 in my direct testimony demonstrates that the EKC highest peak month is in July followed by summer months of June, August and September, being within 10% of the highest peak. The remaining months do not drive the need for additional infrastructure. A 12CP approach places equal weight on each class's contribution to the monthly peaks and mutes cost causation.

As noted in the NARUC manual, the 12 CP approach "is usually used when the monthly peaks lie within a narrow range, i.e., when the annual load shape is not spiky." Figure 1 in my direct testimony demonstrates that all monthly peaks for EKC do not lie within a narrow range but rather only the four highest summer peaks lie within a narrow range. Thus, the 12CP approach results in deviating from cost causation as it pertains to the EKC's system and should not be relied upon, for revenue allocation purposes.

Q. Based on your review of COSS approaches submitted by Staff and CURB, what do you conclude?

A. Compared to the COSS approaches submitted by Staff and CURB, I conclude that the Company's COSS approach follows cost causation and is most reasonable. Therefore, consistent with my direct testimony, I continue to find that the Company's COSS related results can be relied on to guide revenue allocation and rate design.

III. REVENUE REQUIREMENT ALLOCATION

Q. Do you support the revenue allocation recommendation submitted by Staff?

A. No. Staff's revenue allocation recommendation is based on COSS approaches that deviate from cost causation as described above. Therefore, I oppose Staff's revenue allocation recommendation.

Q. Do you support the revenue allocations recommendations submitted by CURB?

A. No. CURB's revenue allocation recommendations are based on COSS models that deviate from cost causation as described above. Therefore, I oppose CURB's revenue allocation recommendation.

Q. Did you review the revenue allocation recommendation made by Commercial Intervenors' witness Mr. Brian Andrews?

A. Yes, I did. Mr. Andrews recommends more aggressive movement towards the Company's COSS results compared to EKC's recommended revenue allocation. He capped the Residential, Churches, Schools, and EV/CCN class at 1.2x the system average increase. For all other classes, he scaled the increases by a factor of 0.9. Figure 3 shows a comparison of the multipliers proposed by the Company, Commercial Intervenors and Walmart and CCPS respectively. In recommending the revenue allocation on behalf of the Commercial Intervenors, Mr. Andrews explains that larger movement towards costs to serve is justified because in the prior case, the Company had proposed a much larger increase, and the multiplier was capped at 113%. He indicates that since the overall rate increase is lower than the previous rate case, it would make sense to allow for more larger movement towards cost-based rates.

Figure 3: Comparison of Revenue Allocation Multipliers recommended by the Company, Walmart and CCPS and Commercial Intervenors

Class	EKC Revenue Allocation Multiplier	Walmart and CCPS Revenue Allocation Multiplier	Commercial Intervenors Multiplier Multiplier
Residential Total	110%	125%	120%
Residential DG	110%	125%	120%
Small General Service Total	93%	82%	83%
Medium General Service Total	88%	70%	79%
Large General Service Total	88%	70%	79%
Large Power Service Total	96%	91%	87%
Educational Services Total	110%	125%	120%
Restricted Time of Day Service	110%	125%	120%
Special Contracts	96%	91%	87%
Interruptible Contract Service	88%	70%	80%
Large Tire Manufacturer	88%	70%	80%
EV Total	110%	125%	120%
Lighting Total	88%	70%	79%

Q. Please comment on Mr. Andrews' revenue allocation proposal.

A. I support Mr. Andrews' rationale to move classes closer to cost. While I appreciate the larger movement closer to costs compared to the Company's proposal, I believe that more aggressive movements than his recommendation are necessary and justified due to the wide deviations between class cost and revenue responsibility as discussed in my direct testimony.

IV. RATE DESIGN

A. The Kroger Co.'s ("Kroger") recommendation regarding MGS Rate Design

Q. What is Kroger's recommendations regarding EKC's proposed rate design for the MGS rate class?

A Kroger's witness Mr. Jared Robertson recommends closer alignment of MGS demand and energy rates to COSS guidance.

Q. How do you respond?

A. In direct testimony, I supported the Company's equal percentage increase to all components of MGS rate design since I felt that the proportional shares of the customer, demand and energy charges being recovered from present rates are a reasonable reflection of COSS guidance. However, I am not opposed to moving energy and demand rate components even closer to the COSS results as recommended by Mr. Robertson. I agree with his view that improving the alignment between rate components and the underlying costs will improve price signals, encourage more efficient grid usage, and reduce intra-class subsidies among customers.

B. Commercial Intervenors Recommendation regarding Optional TOU Rate

Q. What is the Commercial Intervenors' Recommendation regarding the Optional TOU rate specific to the LGS class?

A. Commercial Intervenor witness Mr. Brian Andrews recommends that the Optional TOU rate for the LGS class should be calculated as revenue neutral at the class level to ensure that transmission rates are lower than primary rates, which are lower than secondary rates. He incorporates energy loss factors to ensure the proper relationships between the voltage levels.

Q. How do you respond?

A. Mr. Andrews' concern regarding the energy rates between LGS secondary, primary and transmission are consistent with my concerns highlighted on page 26 of my direct testimony (bullet number 2). I support his view that the energy rates must properly account for the loss factor such that LGS transmission rates are lower than LGS primary

which are lower than LGS secondary rates. The one major difference between his proposal and mine is that while he has not cited concerns, I do not support the concept of recovering the majority of the fixed generation costs from energy charges. As indicated in my direct testimony, fixed cost recovery through volumetric rates provides an erroneous pricing signal that capacity is cheaper than is actually the case. Instead, I believe that it would be more effective to design the energy and demand charges such that they more closely reflect embedded costs to serve and have elements of higher prices in the on peak period in the summer to encourage customers to respond.

Q. Does this conclude your cross answering testimony?

A. Yes.

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AFFIDAVIT OF KAVITA MAINI

STATE OF WISCONSIN)
)
COUNTY OF WAUKESHA)

COMES NOW Kavita Maini and on her oath declares that she is of sound mind and lawful age; that she prepared the attached testimony; and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

Kavita Maini
Kavita Maini

Subscribed and sworn to be this 20 day of June 2025.

KALEY M KONOPASEK NOTARY PUBLIC STATE OF WISCONSIN

Kaley M. Konopasek
Notary Public

Public Redacted Schedule KM-1R: Company's Calculation of AED4CP Allocator (1)

Description	Allocation Basis	Allocation Factor	KS Central Retail	Residential	Res DG	SGS	MGS	LGS	LPS	Educational	RTOD	Special Contracts	Interruptible	LTM	EV	Lighting
[redacted]																

(1) Source: CONF_Evergy (KS Central) Allocators Workpapers 2025 (AED 4CP Tab)

Certificate of Service

I hereby certify that a copy of the foregoing was served by electronic mail the 20th day of June 2025 to the parties below:

Daniel Lawrence
USD 259
903 South Edgemoor Room 113
Wichita, KS 67218
dlawrence@usd259.net

JAMES G. FLAHERTY, ATTORNEY
ANDERSON & BYRD, L.L.P.
216 S HICKORY
PO BOX 17
OTTAWA, KS 66067-0017
jflaherty@andersonbyrd.com

ELIZABETH A. BAKER, ATTORNEY AT LAW
BAKER, STOREY, & WATSON
1603 SW 37TH STREET
TOPEKA, KS 66611
ebaker@bakerstorey.com

NICK SMITH, MANAGER OF KANSAS REGULATION
BLACK HILLS ENERGY CORPORATION
601 North Iowa Street
Lawrence, KS 66044
nick.smith@blackhillscorp.com

ROB DANIEL, Director of Regulatory
BLACK HILLS/KANSAS GAS UTILITY COMPANY LLC D/B/A Black Hills Energy
601 NORTH IOWA STREET
LAWRENCE, KS 66044
rob.daniel@blackhillscorp.com

DOUGLAS LAW, ASSOCIATE GENERAL COUNSEL
BLACK HILLS/KANSAS GAS UTILITY COMPANY, LLC D/B/A BLACK HILLS ENERGY
1731 WINDHOEK DRIVE
LINCOLN, NE 68512
douglas.law@blackhillscorp.com

KURT J. BOEHM, ATTORNEY
BOEHM, KURTZ & LOWRY
36 E SEVENTH ST STE 1510

CINCINNATI, OH 45202
kboehm@bkllawfirm.com

JODY KYLER COHN, ATTORNEY
BOEHM, KURTZ & LOWRY
36 E SEVENTH ST STE 1510
CINCINNATI, OH 45202
jkylercohn@bkllawfirm.com

JOSEPH R. ASTRAB, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Joseph.Astrab@ks.gov

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Todd.Love@ks.gov

SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Shonda.Rabb@ks.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Della.Smith@ks.gov

MELISSA M. BUHRIG, Exec. Vice President, Gen. Counsel & Secretary
CVR REFINING CVL, LLC
2277 Plaza Dr., Ste. 500
Sugar Land, TX 77479
mmbuhrig@CVREnergy.com

JASON T GRAY, ATTORNEY
DUNCAN & ALLEN
1730 Rhode Island Ave., NW
Suite 700
Washington, DC 20036
jtg@duncanallen.com

Justin Bieber
ENERGY STRATEGIES, LLC
PARKSIDE TOWERS
215 S STATE ST STE 200
SALT LAKE CITY, UT 84111
jbieber@energystrat.com

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

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

COLE A BAILEY, CORPORATE COUNSEL DIRECTOR
EVERGY KANSAS SOUTH, INC. D/B/A EVERGY KANSAS CENTRAL
818 S KANSAS AVE, PO Box 889
TOPEKA, KS 66601-0889
cole.bailey@evergy.com

DARRIN IVES, VP - REGULATORY AFFAIRS
EVERGY METRO, INC D/B/A EVERGY KANSAS METRO
One Kansas City Place
1200 Main St., 19th Floor
Kansas City, MO 64105
DARRIN.IVES@EVERGY.COM

RONALD A. KLOTE, DIRECTOR, REGULATORY AFFAIRS
EVERGY METRO, INC D/B/A EVERGY KANSAS METRO
ONE KANSAS CITY PLACE
1200 MAIN, 19TH FLOOR
KANSAS CITY, MO 64105
ronald.klote@evergy.com

DAVID BANKS, CEM, CEP
FLINT HILLS ENERGY CONSULTANT
117 S PARKRIDGE
WICHITA, KS 67209
david@fheconsultants.net

DANIEL J BULLER, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
dbuller@foulston.com

MOLLY E MORGAN, ATTORNEY
FOULSTON SIEFKIN LLP
1551 N. Waterfront Parkway
Suite 100
Wichita, KS 67206
mmorgan@foulston.com

LEE M SMITHYMAN, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
lsmithyman@foulston.com

JAMES P ZAKOURA, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
jzakoura@foulston.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

Jon Lindsey, Corporate Counsel
HF SINCLAIR EL DORADO REFINING LLC
550 E. South Temple
Salt Lake City, UT 84102
jon.lindsey@hfsinclair.com

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

PATRICK HURLEY, CHIEF LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION

1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Patrick.Hurley@ks.gov

CARLY MASENTHIN, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Carly.Masenthin@ks.gov

LORNA EATON, MANAGER OF RATES AND REGULATORY AFFAIRS
KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.
7421 W 129TH STREET
OVERLAND PARK, KS 66213
lorna.eaton@onegas.com

LORNA EATON, MANAGER RATES & REGULATORY - OKE01026
KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.
7421 W 129TH STREET
OVERLAND PARK, KS 66213
invoices@onegas.com

ROBERT E. VINCENT, MANAGING ATTORNEY
KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.
7421 W. 129TH STREET
OVERLAND PARK, KS 66213
robert.vincent@onegas.com

VALERIE SMITH, ADMINISTRATIVE ASSISTANT
MORRIS LAING EVANS BROCK & KENNEDY
800 SW JACKSON
SUITE 1310
TOPEKA, KS 66612-1216
vsmith@morrislaing.com

TREVOR WOHLFORD, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY
800 SW JACKSON
SUITE 1310
TOPEKA, KS 66612-1216
twohlford@morrislaing.com

GLENDA CAFER, MORRIS LAING LAW FIRM
MORRIS LAING EVANS BROCK & KENNEDY CHTD
800 SW JACKSON STE 1310
TOPEKA, KS 66612-1216

gcafer@morrislaing.com

RITA LOWE, PARALEGAL
MORRIS LAING EVANS BROCK & KENNEDY CHTD
300 N MEAD STE 200
WICHITA, KS 67202-2745
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

TIM OPITZ
OPITZ LAW FIRM, LLC
308 E. HIGH STREET
SUITE B101
JEFFERSON CITY, MO 65101
tim.opitz@opitzlawfirm.com

ANNE E. CALLENBACH, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
acallenbach@polsinelli.com

FRANK A. CARO, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
fcaro@polsinelli.com

JARED R. JEVONS, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
JJEVONS@POLSINELLI.COM

Greg Wright
Priority Power Mgt.
12512 Augusta Dr
Kansas City, KS 66109
gwright@prioritypower.com

KACEY S MAYES, ATTORNEY

TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
ksmayes@twgfirm.com

TIMOTHY E. MCKEE, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
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

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

/s/ Tim Opitz
Tim Opitz, KS. Bar No. 29964
Opitz Law Firm, LLC

Attorney for Walmart Inc. and CCPS Transportation, LLC.