

**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, ) Docket No. 25-EKCE-294-RTS  
Inc. for Approval to Make Certain Changes in )  
their Charges for Electric Service. )

**THE WICHITA REGIONAL CHAMBER OF COMMERCE'S  
PETITION TO INTERVENE**

COMES NOW the Wichita Regional Chamber of Commerce, Inc., a Kansas not for profit corporation ("Wichita Regional Chamber") and respectfully petitions the State Corporation Commission of the State of Kansas ("Commission" or "KCC") pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 for an order permitting its intervention and full participation in the above captioned proceeding ("Petition"). In support of its Petition to Intervene, the Wichita Regional Chamber states as follows:

1. The Wichita Regional Chamber offices are located at 350 W. Douglas Avenue, Wichita, Kansas 67202.
2. The Wichita Regional Chamber represents more than 1,200 businesses, along with their respective employees, in the Wichita region. These businesses are, for the most part, located in the electric service territory of Evergy Kansas Central, Inc. ("Evergy Central").
3. The Wichita Regional Chamber strives to create and maintain a competitive business environment to give its members a distinct advantage in achieving their business objectives. Furthermore, the Wichita Regional Chamber focuses on creating prosperity for the entire region. Finally, the Wichita Regional Chamber advocates for pro-business public policies that enable its member businesses to succeed. As part of its mission, the Wichita Regional

Chamber seeks to ensure that its business have access to reliable, continuous electric service, at competitive retail rates -- issues that are central to this instant KCC Docket.

4. On January 31, 2025, Evergy<sup>1</sup> filed an application for approval to make certain changes in their charges for electric service in Kansas.<sup>2</sup>

5. Evergy is requesting a net increase in its revenue requirement of \$196.4 million, after costs included in the property tax surcharge are netted out. – a net increase of 8.64% in total retail revenues.<sup>3</sup>

6. Broadly speaking, this Docket will address: (i) reliable, continuous electric service, and (ii) competitive retail electric rates. These issues are foundational to the economic interests of every business and citizen in Kansas – and to all members of the Wichita Regional Chamber. A reasonable and appropriate resolution of these issues by the KCC in this Docket will be critical to economic development in the Wichita Metropolitan Statistical Area, and will materially affect the Wichita Regional Chamber and its membership.

7. The business community throughout the Wichita region – as well as every citizen of the Wichita regional community – will benefit from good energy policy to be established in this KCC Docket, on the issues of reliable, continuous electric service, and competitive retail electric rates.

8. The Wichita Regional Chamber focuses on the economic growth of the region. Thus, the Wichita Regional Chamber is uniquely situated to represent the regional business

---

<sup>1</sup> Evergy is defined by Intervenor to include Evergy Central and Evergy Kansas South, Inc. (“Evergy South”). Together, unless otherwise indicated, Evergy Central and Evergy South are referred to as “Evergy” throughout the document.

<sup>2</sup> Evergy Joint Application, KCC Docket No. 25-EKCE-294-RTS, (Jan. 31, 2025).

<sup>3</sup> *Id.* at ¶ 2.

community on these energy policy issues. The Wichita Regional Chamber has existed in some form since 1917 and throughout this entire period the Wichita Regional Chamber has consistently advocated for the advancement and health of this unique business community where manufacturing, agriculture, education, and the service industry come together.

9. The experience of the Wichita Regional Chamber of addressing critical components of a positive economic climate for businesses in this specific region make the intervention of the Wichita Regional Chamber in this Docket “unique,” and represents local business interests.

10. The “rights, duties, privileges, immunities, or other legal interests) of the Wichita Regional Chamber and its membership, may be substantially affected by this proceeding” (K.A.R. 82-1-225) and intervention is appropriate under applicable Kansas law for the Wichita Regional Chamber.

11. On June 14, 2023, the Wichita Regional Chamber filed a petition to intervene in Evergy’s most recent previous rate case, KCC Docket No. 23-EKCE-775-RTS.

12. In that case, the Commission granted the Wichita Regional Chamber’s petition on July 6, 2023.

13. Furthermore, the Commission has a history and precedent of granting intervention to entities that represent distinct policy interests – including, but not limited to the Sierra Club, the Climate and Energy Project, the Natural Resources Defense Council (NRDC), the American Association of Retired Persons (AARP), Earth Justice, IBEW Local Union 304, The Council for the New Energy Economics, and the Kansas Appleseed Center for Law and Justice, Inc.

#### **Applicable Law**

14. K.A.R. 82-1-225, provides in pertinent part:

**82-1-225. Intervention.** This regulation shall apply to both KAPA and non-KAPA proceedings. (a) The presiding officer shall grant a petition for intervention if the following conditions are met:

(1) The petition is submitted in writing to the presiding officer, with copies mailed to all parties named in the presiding officer's notice of the hearing, at least three days before the hearing.

(2) The petition states facts demonstrating that the petitioner's legal rights, duties, privileges, immunities, or other legal interests may be substantially affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law.

15. The KCC, in applying K.A.R. 82-1-225 has stated:

The Commission shall grant Intervention if the Petition:

“(1) is submitted in writing to the presiding officer, with the service on all parties named in the Commission’s notice of hearing, at least 3 business days before the hearing; (2) states facts demonstrating the petitioner’s legal rights, duties, privileges, immunities, or other legal interests may be substantially affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law; and (3) the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention. The Commission has discretion to grant intervention at any time where intervention is in the interests of justice and will not impair the orderly and prompt conduct of proceedings. At any time during a proceeding, the Commission may impose limitations on the intervenor’s participation, which may include: (1) limiting an intervenor’s participation to designated issues in which the intervenor has a particular interest demonstrated by the petition; (2) limiting in the intervenor’s discovery, cross-examination, and other procedures; and requiring intervenors to consolidate their participation in the proceedings.” ORDER GRANTING INTERVENTIONS, KCC Docket No. 22-EKME-254-TAR, March 31, 2022, at para. 8.

16. The Wichita Regional Chamber has stated facts herein that support its participation as an Intervenor herein in that it has direct energy policy interests in the Commission’s Order in this Docket.

**Prayer for Relief**

WHEREFORE. The Wichita Regional Chamber requests that the Commission make the following findings:

The Wichita Regional Chamber has met all requirements for intervention under Kansas law, in that the Wichita Regional Chamber:

- (a) has submitted in writing this petition for intervention to the Commission, with service on all parties;
- (b) has stated facts in this petition for intervention demonstrating that the Intervenor's legal rights, duties, privileges, immunities, and other legal interests may be substantially affected by this KCC Docket;
- (c) the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention;
- (d) therefore, the Commission issue an Order that this petition for intervention is granted to the Wichita Regional Chamber; and
- (e) that the Wichita Regional Chamber is granted by the Commission full rights of intervention under Kansas law in this Docket, and the Wichita Regional Chamber can participate fully as a Party under Kansas law in this Docket.

Respectfully submitted,

/s/ Molly E. Morgan

Molly E. Morgan, KS 29683  
C. Edward Watson, KS 23386  
FOULSTON SIEFKIN LLP  
1551 Waterfront Parkway, Suite 100  
Wichita, KS 67206  
Telephone: 316-267-6371  
Email: [cewatson@foulston.com](mailto:cewatson@foulston.com)  
[mmorgan@foulston.com](mailto:mmorgan@foulston.com)

*Attorneys for Intervenor*

**VERIFICATION**

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF SEDGWICK    )

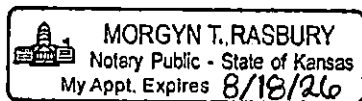
Molly E. Morgan, being duly sworn upon his oath, deposes and states that he is the Attorney for Wichita Regional Chamber that he has read and is familiar with the foregoing *Petition to Intervene*, and that the statements therein are true to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
Molly E. Morgan

SUBSCRIBED AND SWORN to before me this 6<sup>th</sup> day of June 2025.

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

My Appointment Expires: 8/18/26



## **CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of June 2025, the foregoing *Petition to Intervene*, was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to all parties on the service list as follows:

USD 259  
903 South Edgemoor Room 113  
Wichita, KS 67218

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

ELIZABETH A. BAKER, ATTORNEY AT  
LAW  
BAKER, STOREY, & WATSON  
1603 SW 37TH STREET  
TOPEKA, KS 66611  
[ebaker@bakerstorey.com](mailto:ebaker@bakerstorey.com)

NICK SMITH, MANAGER OF KANSAS  
REGULATION  
BLACK HILLS ENERGY CORPORATION  
601 North Iowa Street  
Lawrence, KS 66044  
[nick.smith@blackhillscorp.com](mailto: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](mailto: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](mailto:douglas.law@blackhillscorp.com)

KURT J. BOEHM, ATTORNEY  
BOEHM, KURTZ & LOWRY  
36 E SEVENTH ST STE 1510  
CINCINNATI, OH 45202  
[kboehm@bkllawfirm.com](mailto:kboehm@bkllawfirm.com)

JODY KYLER COHN, ATTORNEY  
BOEHM, KURTZ & LOWRY  
36 E SEVENTH ST STE 1510  
CINCINNATI, OH 45202  
[jkylercohn@bkllawfirm.com](mailto:jkylercohn@bkllawfirm.com)

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

TODD E. LOVE, ATTORNEY  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[Todd.Love@ks.gov](mailto:Todd.Love@ks.gov)

SHONDA RABB  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[Shonda.Rabb@ks.gov](mailto:Shonda.Rabb@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](mailto:mmbuhrig@CVREnergy.com)

Justin Bieber  
ENERGY STRATEGIES, LLC  
PARKSIDE TOWERS  
215 S STATE ST STE 200  
SALT LAKE CITY, UT 84111  
[jbieber@energystat.com](mailto:jbieber@energystat.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](mailto:leslie.wines@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](mailto:DARRIN.IVES@EVERGY.COM)

DAVID BANKS, CEM, CEP  
FLINT HILLS ENERGY CONSULTANT  
117 S PARKRIDGE  
WICHITA, KS 67209  
[david@theconsultants.net](mailto:david@theconsultants.net)

DELLA SMITH  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[Della.Smith@ks.gov](mailto:Della.Smith@ks.gov)

JASON T GRAY, ATTORNEY  
DUNCAN & ALLEN  
1730 Rhode Island Ave., NW  
Suite 700  
Washington, DC 20036  
[jtg@duncanallen.com](mailto:jtg@duncanallen.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](mailto:Cathy.Dinges@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](mailto:cole.bailey@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](mailto:ronald.klote@evergy.com)

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



MOLLY E MORGAN, ATTORNEY  
FOULSTON SIEFKIN LLP  
1551 N. Waterfront Parkway  
Suite 100  
Wichita, KS 67206  
[mmorgan@foulston.com](mailto:mmorgan@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)

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

PATRICK HURLEY, CHIEF LITIGATION  
COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[Patrick.Hurley@ks.gov](mailto:Patrick.Hurley@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](mailto:lorna.eaton@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](mailto:robert.vincent@onegas.com)

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

Constance Chan, Senior Category Manager -  
Electricity & Business Travel  
HF SINCLAIR EL DORADO REFINING LLC  
2323 Victory Ave. Ste 1400  
Dallas, TX 75219  
[constance.chan@hfsinclair.com](mailto:constance.chan@hfsinclair.com)

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

CARLY MASENTHIN, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[Carly.Masenthin@ks.gov](mailto:Carly.Masenthin@ks.gov)

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](mailto:invoices@onegas.com)

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

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

RITA LOWE, PARALEGAL  
MORRIS LAING EVANS BROCK &  
KENNEDY CHTD  
300 N MEAD STE 200  
WICHITA, KS 67202-2745  
[rlowe@morrislaing.com](mailto:rlowe@morrislaing.com)

TIM OPITZ  
OPITZ LAW FIRM, LLC  
308 E. HIGH STREET  
SUITE B101  
JEFFERSON CITY, MO 65101  
[tim.opitz@opitzlawfirm.com](mailto:tim.opitz@opitzlawfirm.com)

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

Greg Wright  
Priority Power Mgt.  
12512 Augusta Dr  
Kansas City, KS 66109  
[gwright@prioritypower.com](mailto:gwright@prioritypower.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)

GLEND A. CAFER, MORRIS LAING LAW FIRM  
MORRIS LAING EVANS BROCK & KENNEDY  
CHTD  
800 SW JACKSON STE 1310  
TOPEKA, KS 66612-1216  
[gcafer@morrislaing.com](mailto:gcafer@morrislaing.com)

WILL B. WOHLFORD, ATTORNEY  
MORRIS LAING EVANS BROCK & KENNEDY  
CHTD  
300 N MEAD STE 200  
WICHITA, KS 67202-2745  
[wwohlford@morrislaing.com](mailto:wwohlford@morrislaing.com)

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

JARED R. JEVONS, ATTORNEY  
POLSINELLI PC  
900 W 48TH PLACE STE 900  
KANSAS CITY, MO 64112  
[JJEVONS@POLSINELLI.COM](mailto:JJEVONS@POLSINELLI.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)

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](mailto: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](mailto:kevin.k.lachance.civ@army.mil)

C. EDWARD WATSON, II, ATTORNEY  
FOULSTON SIEFKIN LLP  
1551 N. Waterfront Parkway  
Suite 100  
Wichita, KS 67206  
[cewatson@foulston.com](mailto:cewatson@foulston.com)

Respectfully submitted,

*s. Molly E. Morgan*

Molly E. Morgan, KS 29683  
C. Edward Watson, KS 23386  
FOULSTON SIEFKIN LLP  
1551 Waterfront Parkway, Suite 100  
Wichita, KS 67206  
Telephone: 316-267-6371  
Email: [cewatson@foulston.com](mailto:cewatson@foulston.com)  
[mmorgan@foulston.com](mailto:mmorgan@foulston.com)

*Attorneys for Intervenor*