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

Docket No. 25-EKCE-294-RTS

PETITION TO INTERVENE

COMES NOW The Goodyear Tire & Rubber Company ("Goodyear"), and states to the State

Corporation Commission of the State of Kansas ("Commission" or "KCC") as follows:

1. On January 31, 2025, Evergy Kansas Central, Inc. and Evergy Kansas South, Inc.

(collectively "EKC") filed a Joint Application requesting a net increase in its revenue

requirement of \$196.4 million, or 8.64% in total retail revenues.

2. Goodyear is a retail ratepayer and is a direct customer of EKC. As a direct

customer of Evergy, Goodyear has a direct financial interest in this KCC proceeding in that the requested increase in the revenue of EKC will be charged to retail ratepayers of EKC, including Goodyear.

Applicable Law

3. 5. K.A.R. 82-1-225. provides in pertinent part: 82-1-225. Intervention. This regulation shall apply to both KAP A 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

1

interests may be substantially affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law.

4. Goodyear has stated facts herein that support its participation as Intervenor herein in that it has direct financial interests and direct energy policy interests in the Commission's Order in this Docket.

CONCLUSION

WHEREFORE, Intervenor respectfully requests that the Commission grant to Goodyear, Incorporated intervention in this KCC Docket.

Respectfully submitted.

/s/ James P. Zakoura James P. Zakoura, KS 07644 Lee M. Smithyman, KS 09391 Daniel J. Buller, KS 25002 Molly E. Morgan, KS 29683 FOULSTON SIEFKIN LLP 7500 College Boulevard, Suite 1400 Overland Park, KS 66210-4041 Telephone: 913-253-2142 Email: jzakoura@foulston.com Ismithyman@foulston.com dbuller@foulston.com

Attorneys for The Goodyear Tire & Rubber Company

VERIFICATION

STATE OF KANSAS)) ss: COUNTY OF JOHNSON)

James P. Zakoura, being duly sworn upon his oath, deposes and states that he is the Attorney for The Goodyear Tire & Rubber Company that he has read and is familiar with the foregoing *Petition for Intervention*, and that the statements therein are true to the best of his knowledge, information, and belief.

Janes P. Zakoura

SUBSCRIBED AND SWORN to before me this 14th day of April 2025.

Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of April 2025, the foregoing was electronically filed

with the Kansas Corporation Commission and that one copy was delivered electronically to all

parties on the service list as follows:

CATHRYN J. DINGES, SR DIRECTOR &	LESLIE WINES, Sr. Exec. Admin. Asst.
REGULATORY AFFAIRS COUNSEL	EVERGY KANSAS CENTRAL. INC
EVERGY KANSAS CENTRAL, INC	818 S KANSAS AVE
818 S KANSAS AVE	PO BOX 889
PO BOX 889	TOPEKA, KS 66601-0889
TOPEKA, KS_66601-0889	leslie.wines@evergy.com
cathy.dinges@evergy.com	
COLE A BAILEY, CORPORATE	DARRIN IVES. VP - REGULATORY
COUNSEL DIRECTOR	AFFAIRS
EVERGY KANSAS SOUTH.	EVERGY METRO, INC D/B/A EVERGY
INC. D/B/A EVERGY KANSAS CENTRAL	KANSAS METRO
818 S KANSAS AVE, PO Box 889	One Kansas City Place
TOPEKA, KS 66601-0889	1200 Main St., 19th Floor
cole.bailey@evergy.com	Kansas City, MO 64105
	darrin.ives@evergy.com
RONALD A. KLOTE, DIRECTOR,	BRIAN G. FEDOTIN, GENERAL
REGULATORY AFFAIRS	COUNSEL
EVERGY METRO, INC D/B/A EVERGY	KANSAS CORPORATION COMMISSION
KANSAS METRO	1500 SW ARROWHEAD RD
ONE KANSAS CITY PLACE	TOPEKA, KS 66604
1200 MAIN, 19TH FLOOR	brian.fedotin@ks.gov
KANSAS CITY. MO 64105	
ronald.klote@evergy.com	
PATRICK HURLEY, CHIEF LITIGATION	CARLY MASENTHIN. LITIGATION
COUNSEL	COUNSEL
KANSAS CORPORATION COMMISSION	KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD	1500 SW ARROWHEAD RD
TOPEKA, KS 66604	TOPEKA, KS 66604
patrick.hurley@ks.gov	carly.masenthin@ks.gov

VALERIE SMITH, ADMINISTRATIVE	TREVOR WOHLFORD, ATTORNEY
ASSISTANT	MORRIS LAING EVANS BROCK &
MORRIS LAING EVANS BROCK &	KENNEDY
KENNEDY	800 SW JACKSON
800 SW JACKSON	SUITE 1310
SUITE 1310	TOPEKA, KS 66612-1216
TOPEKA, KS 66612-1216	twohlford@morrislaing.com
vsmith@morrislaing.com	
GLENDA CAFER	RITA LOWE, PARALEGAL
MORRIS LAING EVANS BROCK &	MORRIS LAING EVANS BROCK &
KENNEDY CHTD	KENNEDY CHTD
800 SW JACKSON STE 1310	300 N MEAD STE 200
TOPEKA, KS 66612-1216	WICHITA, KS 67202-2745
gcafer@morrislaing.com	rlowe@morrislaing.com
Bearer Whiterrorani Broom	
WILL B. WOHLFORD, ATTORNEY	USD 259
MORRIS LAING EVANS BROCK &	903 South Edgemoor Room 113
KENNEDY CHTD	Wichita, KS 67218
300 N MEAD STE 200	(Sent via U.S. Mail)
WICHITA, KS 67202-2745	
wwohlford@morrislaing.com	
JAMES G. FLAHERTY, ATTORNEY	ELIZABETH A. BAKER, ATTORNEY AT
ANDERSON & BYRD, L.L.P.	LAW
216 S HICKORY	BAKER, STOREY, & WATSON
PO BOX 17	1603 SW 37TH STREET
OTTAWA, KS 66067-0017	TOPEKA, KS 66611
jflaherty@andersonbyrd.com	ebaker@bakerstorey.com
KUDT I DOELIM ATTODNEV	
KURT J. BOEHM, ATTORNEY	JODY KYLER COHN. ATTORNEY
BOEHM, KURTZ & LOWRY	BOEHM, KURTZ & LOWRY
BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510	BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510
BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202	BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202
BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510	BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510
BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 <u>kboehm@bkllawfirm.com</u>	BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202
BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 <u>kboehm@bkllawfirm.com</u> JOSEPH R. ASTRAB, CONSUMER	BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 jkylercohn@bkllawfirm.com
BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 <u>kboehm@bkllawfirm.com</u>	BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 jkylercohn@bkllawfirm.com TODD E. LOVE, ATTORNEY
BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 <u>kboehm@bkllawfirm.com</u> JOSEPH R. ASTRAB, CONSUMER COUNSEL	BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 jkylercohn@bkllawfirm.com TODD E. LOVE, ATTORNEY CITIZENS' UTILITY RATEPAYER
BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 <u>kboehm@bkllawfirm.com</u> JOSEPH R. ASTRAB, CONSUMER COUNSEL CITIZENS' UTILITY RATEPAYER	BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 jkylercohn@bkllawfirm.com TODD E. LOVE, ATTORNEY CITIZENS' UTILITY RATEPAYER BOARD
BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 <u>kboehm@bkllawfirm.com</u> JOSEPH R. ASTRAB, CONSUMER COUNSEL CITIZENS' UTILITY RATEPAYER BOARD	BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CJNCINNATI, OH 45202 jkylercohn@bkllawfirm.com TODD E. LOVE, ATTORNEY CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD
BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 <u>kboehm@bkllawfirm.com</u> JOSEPH R. ASTRAB, CONSUMER COUNSEL CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD	BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 jkylercohn@bkllawfirm.com TODD E. LOVE, ATTORNEY CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604

SHONDA RABB	DELI.A SMITH
CITIZENS' UTILITY RATEPAYER	CITIZENS' UTILITY RATEPAYER
BOARD	BOARD
1500 SW ARROWHEAD RD	1500 SW ARROWHEAD RD
TOPEKA, KS 66604	TOPEKA, KS 66604
shonda.rabb@ks.gov	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, STE 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	DAVID BANKS, CEM, CEP FLINT HILLS ENERGY CONSULTANT 117 S PARKRIDGE WICHITA, KS 67209 <u>david@fheconsultants.net</u>
CONSTANCE CHAN, SENIOR CATEGORY MANAGER - ELECTRICITY & BUSINESS TRAVEL HF SINCLAIR EL DORADO REFINING LLC 2323 VICTORY AVE. STE 1400 DALLA, TX 75219 <u>constance.chan@hfsinclair.com</u>	JON LINDSEY, CORPORATE COUNSEL HF SINCLAIR EL DORADO REFINING LLC 550 E. SOUTH TEMPLE SALT LAKE CITY, UT 84102 jon.lindsey@hfsinclair.com
ANNE E. CALLENBACH, ATTORNEY	FRANK A. CARO, ATTORNEY
POLSINELLI PC	POLSINELLI PC
900 W 48TH PLACE STE 900	900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112	KANSAS CITY, MO 64112
acallenbach@polsinelli.com	fcaro@polsinelli.com
JARED R. JEVONS, ATTORNEY	GREG WRIGHT
POLSINELLI PC	PRIORITY POWER MGT.
900 W 48TH PLACE STE 900	12512 AUGUSTA DR
KANSAS CITY, MO 64112	KANSAS CITY, KS 66109
jjevons@polsinelli.com	gwright@prioritypower.com

KACEY S MAYES. ATTORNEY TRIPLETT. WOOLF & GARRETSON, LLC 2959 N ROCK RD STE 300 WICHITA, KS 67226 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	TIMOTHY E. McKEE, ATTORNEY TRIPLETT, WOOLF & GARRETSON, LLC 2959 N ROCK RD STE 300 WICHITA, KS 67226 temckee@twgfirm.com 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.lachancc.civ@army.mil
NICK SMITH. MANAGER OF KANSAS REGULATION BLACK HILLS ENERGY CORPORATION 601 NORTH IOWA STREET LAWRENCE, KS 66044 <u>nick.smith@blackhillscorp.com</u>	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	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
DANIEL J BULLER, ATTORNEY FOULSTON SIEFKIN LLP 7500 COLLEGE BOULEVARD, STE 1400 OVERLAND PARK, KS 66201-4041 dbuller@foulston.com	ROBERT E. VINCENT, MANAGING ATTORNEY KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC. 7421 W. 129TH STREET OVERLAND PARK, KS 66213 rober:.vincent@onegas.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 Ismithyman@foulston.com

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

<u>/s/ James P. Zakoura</u> James P. Zakoura, #07644

.

.