BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

SUPPLEMENTAL DIRECT TESTIMONY OF

DARRIN R. IVES

ON BEHALF OF EVERGY METRO, INC., EVERGY KANSAS CENTRAL, INC. AND EVERGY KANSAS SOUTH, INC.

IN THE MATTER OF THE PETITION OF EVERGY KANSAS CENTRAL, INC., EVERGY KANSAS SOUTH, INC., AND EVERGY METRO, INC. FOR DETERMINATION OF THE RATEMAKING PRINCIPLES AND TREATMENT THAT WILL APPLY TO THE RECOVERY IN RATES OF THE COST TO BE INCURRED FOR CERTAIN ELECTRIC GENERATION FACILITIES UNDER K.S.A. 66-117.

Docket No. 25-EKCE-207-PRE

February 14, 2025

1	Q.	Please state your name and business address.
2	A.	My name is Darrin R. Ives. My business address is 1200 Main, Kansas City, Missouri
3		64105.
4	Q.	Did you file direct testimony in this docket on November 6, 2024?
5	A.	Yes.
6	Q.	What is the purpose of your supplemental direct testimony?
7	A.	In accordance with the decision framework described in my initial direct testimony, it has
8		been determined that the second 50% ownership interest in the McNew combined cycle
9		gas turbine ("CCGT") station should be allocated to Evergy Missouri West ("EMW"). My
10		supplemental direct testimony:
11		(1) Reaffirms that the acquisition by Evergy Kansas Central ("EKC") of a 50% ownership
12		interest in the McNew CCGT station and a 50% ownership interest in the Viola CCGT
13		station is consistent with EKC's most recent Integrated Resources Plan ("IRP") and
14		is reasonable, reliable, and efficient;
15		(2) Identifies and discusses the factors supporting this allocation decision;
16		(3) Identifies the definitive cost estimates for the Viola and McNew CCGT stations and
17		the Kansas Sky solar facility; and
18		(4) Provides an overview of the estimated rate impacts attributable to the construction
19		and commercial operation of the two CCGT stations and the solar facility.
20	Q.	Please identify the other Company witnesses who are filing supplemental direct
21		testimony in this docket.
22	A.	Below is a list of other Company witnesses filing supplemental direct testimony and the
23		subject matters addressed by each witness:

1		 Jason Humphrey discusses progress made on EKC's development efforts with respect
2		to the two CCGT facilities and the Kansas Sky solar facility. He also discusses the
3		potential impacts of President Trump's plan to levy new tariffs on steel and aluminum
4		imports.
5		• Cody VandeVelde provides a detailed explanation of the consistency between EKC's
6		2024 IRP and the McNew CCGT station allocation decision, including the impact of
7		the definitive cost estimate on the preferred portfolio selection.
8		• J Kyle Olson identifies and explains the elements of the definitive cost estimates for
9		the Viola and McNew CCGT stations. He also addresses the reasonableness of the
10		definitive cost estimates.
11	0	L
11	Q.	In your initial direct testimony you indicated that EKC's "starting proposal" was to
11	Q.	allocate the full 100% of the McNew CCGT station to EKC but indicated that 50%
	Q.	
12	Q.	allocate the full 100% of the McNew CCGT station to EKC but indicated that 50%
12 13	Q.	allocate the full 100% of the McNew CCGT station to EKC but indicated that 50% of the allocation could be transferred to EMW or Evergy Metro ("EM") if certain
12 13 14	Q. A.	allocate the full 100% of the McNew CCGT station to EKC but indicated that 50% of the allocation could be transferred to EMW or Evergy Metro ("EM") if certain conditions were met. What factual and analytical considerations supported allocating
12 13 14 15		allocate the full 100% of the McNew CCGT station to EKC but indicated that 50% of the allocation could be transferred to EMW or Evergy Metro ("EM") if certain conditions were met. What factual and analytical considerations supported allocating 50% of the McNew CCGT station to EMW?
12 13 14 15 16		allocate the full 100% of the McNew CCGT station to EKC but indicated that 50% of the allocation could be transferred to EMW or Evergy Metro ("EM") if certain conditions were met. What factual and analytical considerations supported allocating 50% of the McNew CCGT station to EMW? As I stated in my initial direct testimony, there was a possibility that the second 50% of the
12 13 14 15 16 17		allocate the full 100% of the McNew CCGT station to EKC but indicated that 50% of the allocation could be transferred to EMW or Evergy Metro ("EM") if certain conditions were met. What factual and analytical considerations supported allocating 50% of the McNew CCGT station to EMW? As I stated in my initial direct testimony, there was a possibility that the second 50% of the McNew CCGT station could be transferred to EMW for regional resource adequacy
12 13 14 15 16 17 18		allocate the full 100% of the McNew CCGT station to EKC but indicated that 50% of the allocation could be transferred to EMW or Evergy Metro ("EM") if certain conditions were met. What factual and analytical considerations supported allocating 50% of the McNew CCGT station to EMW? As I stated in my initial direct testimony, there was a possibility that the second 50% of the McNew CCGT station could be transferred to EMW for regional resource adequacy considerations. ¹ We have determined that, based on a number of considerations and factors

¹ See Ives Direct Testimony, p. 31 (Nov. 6, 2024).

1	Q.	Please describe the decision-making process utilized to arrive at the decision to
2		allocate the second 50% of the McNew CCGT facility to EMW.
3	A.	As stated in my initial direct testimony, the second 50% of the McNew CCGT facility would
4		be transferred to EMW only if three conditions were met:
5		(1) The addition of an incremental large load customer under evaluation is confirmed to
6		be located in EMW territory and EMW is responsible for developing capacity
7		resources to meet the new load;
8		(2) EMW is able to complete transmission infrastructure upgrades in time to accommodate
9		the new large load customer's planned load ramp; and
10		(3) EMW is able to finance the construction and ownership of the 50% allocation.
11	Q.	Have those three conditions been met?
12	A.	Yes, all three conditions have been met. As outlined in the supplemental direct testimony
13		of Cody VandeVelde, the Company reviewed and considered a number of factors that can
14		play a role in impacting resource need among the various affiliates, EKC, EM and EMW.
15		These factors included, but were not necessarily limited to, likely load additions and future
16		demand projections, as well as flexibility within each affiliate's portfolio. Although no
17		particular load addition or additions anticipated by any affiliate drove the decision, the
18		Company did analyze likely load additions in each affiliate's territory, which included an
19		AQ assessment with Southwest Power Pool ("SPP"). Ultimately, the analysis concluded
20		that all three affiliates had sufficient future load and additional demand to support
21		allocation of the second half of the McNew facility. However, EKC and EM demonstrated
22		that they have a later need for the additional capacity, or have more flexibility with respect
23		to other generation assets, including possible flexibility to delay retirement of some assets.

This flexibility would enable EKC and EM to more readily meet their customers' needs without the addition of the second half of the McNew facility. In addition, EMW not only presented less flexibility than the other two candidate affiliates, but it also has the most acute need for the additional generation provided by the second half of the McNew facility. Based on these factors, the decision was made to allocate the second half of the McNew facility to EMW.

Q. Is EKC's acquisition of 50% of the Viola CCGT facility to go into service in January
1, 2029, and 50% of the McNew CCGT facility to go into service January 1, 2030, and
100% of the Kansas Sky solar facility consistent with EKC's most recent IRP?

Yes. These generation additions are consistent with the most recent EKC IRP. As stated in 10 Α. the supplemental direct testimony of Cody VandeVelde, acquisition of 50% of the Viola 11 CCGT facility corresponds with the 325 MW of additional thermal generation called for in 12 2029 by the preferred portfolio. Similarly, 50% of the McNew CCGT facility corresponds 13 14 with the 325 MW of additional thermal generation called for in 2030, and is therefore also consistent with the 2024 IRP. In addition, the 159 MW Kansas Sky solar facility directly 15 corresponds with the 150 MW of additional solar generation called for in 2027. The generation 16 17 additions under review in this docket fit directly with specific generation requirements in EKC's 2024 IRP and, therefore, the addition of these assets is consistent with EKC's most 18 19 recent preferred plan.

Q. In your initial direct testimony you proposed that EKC would provide updated cost information, including definitive cost estimates for the Viola and McNew generating stations, in supplemental testimony to be filed February 14, 2025. What are the definitive cost estimates for the two stations?

A. The definitive cost estimates for the two CCGT facilities are specifically identified and 1 discussed in detail in the supplemental direct testimony of Mr. Olsen. The definitive cost 2 estimates include specific cost figures derived from EPC bids submitted and received on 3 or around January 31, 2025. Those bids and bid detail, including specific categories of costs 4 as well as information from owner costs related to various categories of costs, have all been 5 incorporated to arrive at the definitive cost estimates for these projects. As Mr. Olson states 6 in his supplemental direct testimony, the definitive cost estimates for the CCGT projects 7 changed very little from the initial cost estimates submitted with EKC's Petition and initial 8 9 direct testimony filed in this docket on November 6, 2024. Specific detail regarding these cost categories and the estimates making up the definitive cost estimates are discussed in 10 greater detail in Mr. Olson's supplemental direct testimony and are identified in the 11 Confidential exhibits attached to that testimony. Mr. Olson's supplemental direct testimony 12 also identifies the total dollar amounts of the definitive cost estimates. 13

14

15

Q.

Have there been any changes or updates to the cost estimate for construction of the Kansas Sky solar facility?

A. No. There have been no changes to the cost estimate or the levelized rate requirement for the Kansas Sky solar facility. The original cost estimate and levelized rate requirement for the Kansas Sky solar facility are disclosed in the direct testimony of Company witness John Carlson, filed in this docket on November 6, 2024. The specific dollar amount of the definitive cost estimate for the Kansas Sky solar facility is stated in Jason Humphrey's supplemental direct testimony filing.

22 Q. Do you have an opinion as to the reasonableness of the definitive cost estimates?

A. My opinion is that the definitive cost estimates are the result of a diligent and competitive 1 process. The Company is now working to complete contracting with highly capable 2 engineering and contracting firms to perform the design and construction of these projects 3 at a reasonable and competitive cost. In my opinion, based on the need for new diverse 4 generation assets, the projected demands placed on EKC's system, and the highly competitive 5 market for procurement and construction related to new generation facilities and equipment, 6 the costs of these projects are reasonable. Furthermore, the addition of diverse generation 7 assets, including highly reliable and dispatchable CCGT generation, as well as clean solar 8 9 generation assets, further underscores the reasonableness of the projects and their costs, and provides additional reliable and efficient generation for EKC customers. 10

Q. Has there been progress made with respect to development of the two CCGT facilities and the Kansas Sky solar facility since you filed your initial direct testimony on November 6, 2024?

14 A. Yes, there have been substantial developments on all three projects since that time. In summary, EKC has finalized Power Island Equipment ("PIE") agreements and Generator 15 Step Up Transformer ("GSU") agreements for both CCGT projects. In addition, as discussed 16 17 above, EKC has received complete EPC bids, enabling EKC to complete its definitive cost estimates for both CCGT projects. With respect to the Kansas Sky solar project, EKC has 18 selected an EPC contractor, DEPCOM, and has executed an EPC contract for that project. 19 20 EKC has also formalized its solar panel supply contract with its contractor, ZNShine PV-Tec Co., and has secured an agreement for GSU equipment with its supplier, GE Waukesha, 21 for the Kansas Sky solar project. These developments, and certain new risks facing the 22

three projects under review, are discussed in greater detail in the supplemental direct
 testimony of Jason Humphrey.

3 Q. Based on these developments, are the projects progressing as expected?

A. These developments show that the projects are progressing in due course and are timely
proceeding as expected on a path toward the construction phase. We are pleased with the
progress we have seen so far, and we look forward to continuing to advance these important
projects toward construction.

8 Q. Is EKC proposing any changes in the accounting methodology or cost recovery 9 approaches described in the Petition and direct testimony, including the utilization of 10 the statutory CWIP rider for the two natural gas plants?

11 A. No. The accounting methodologies proposed in my initial direct testimony, and particularly 12 those addressed beginning at page 11 of the direct testimony of Company witness Ron 13 Klote related to accounting for the jointly owned assets, the use of Joint Ownership and 14 Joint Operating Agreements and general accounting for costs related to and incurred in 15 construction of jointly owned assets, have not changed.

Q. Given the definitive cost estimates and the decision that EMW will acquire a 50%
 ownership interest in the McNew generating station, what are the estimated rate
 impacts attributable to the overall project – i.e., the two CCGT stations and the Kansas
 Sky solar project?

A. The estimated rate impacts of these projects were addressed in the direct testimonies of Mr.
 Klote and John Grace. Mr. Klote's and Mr. Grace's estimated rate impacts related to both
 the CCGT projects and the Kansas Sky solar project are also summarized in my initial

direct testimony.² Those estimated rate impacts assumed that EKC would acquire 50% of 1 each of the Viola and McNew CCGT facilities, and would acquire 100% of the Kansas Sky 2 solar facility. Because the Company has decided to allocate the second 50% of the McNew 3 facility to EMW, the ultimate assignment and ownership of these facilities matches the initial 4 assumptions on which the rate estimates were based. Therefore, no adjustment to the 5 estimated rate impacts was required as a result of the allocation decision for the second 50% 6 of the McNew facility. In addition, as discussed above, the estimated costs of the projects 7 changed very little between the original cost estimate and the definitive cost estimate. EKC 8 9 has analyzed expected rate impacts inputting the cost figures in the definitive cost estimate. That updated analysis revealed no changes to the estimated rate impacts based upon the 10 relatively small difference between the original cost estimate and the definitive cost estimate. 11 Therefore, original estimated rate impacts identified by Mr. Klote and Mr. Grace have not 12 changed. 13

Q. In his supplemental direct testimony, Jason Humphrey identifies President Trump's new
 steel and aluminum tariff proclamations as an emerging project risk. Please briefly
 describe these tariffs and explain what the Company is proposing to address this new
 development.

A. President Trump recently issued executive proclamations announcing his plan to impose new 25% tariffs on steel and aluminum imports and to revoke existing alternative arrangements and exemptions from these duties. The proclamations, which are scheduled to go into effect March 12, 2025, expand the tariff orders issued by Mr. Trump in 2018 during his first term in office. The new tariffs would add another layer of risk and complexity to project

² See Ives Direct Testimony, p. 34 (Nov. 6, 2024).

development, and implementation of these tariffs is beyond the Company's control. In order to appropriately address this extraordinary development, as Mr. Humphrey explains in his supplemental direct testimony, the Company requests leave to submit an adjusted definitive cost estimate, along with supporting testimony, accounting for the known and quantifiable impacts of President Trump's tariff proclamations. The Company's proposal would be to file the adjusted definitive cost estimate after the impacts of the tariff proclamations and other changes in law or tariff policy become more definite and certain upon implementation.

- 8 Q. Does that conclude your testimony?
- 9 A. Yes.

COUNTY OF SHAWNEE STATE OF KANSAS

) ss:

VERIFICATION

Darrin R Ives, being duly sworn upon his oath deposes and states that he is the Vice President, Regulatory Affairs, for Evergy, Inc., that he has read and is familiar with the foregoing Testimony, and attests that the statements contained therein are true and correct to the best of his knowledge, information and belief.

Darrin R. Ives

Subscribed and sworn to before me this 14th day of February 2025.

9 Notary Public

Van 30, 2026 My Appointment Expires:

12026 NOTARY PUBLIC - State of Kansas MY APPT. EXPIRES 530/2

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed, this 14th day of February 2025, to all parties of record as listed below:

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

SHELLY M BASS, SENIOR ATTORNEY ATMOS ENERGY CORPORATION 5430 LBJ FREEWAY 1800 THREE LINCOLN CENTRE DALLAS, TX 75240 <u>shelly.bass@atmosenergy.com</u>

KATHLEEN R OCANAS, DIVISION VP OF RATES & REGULATORY AFFAIRS ATMOS ENERGY CORPORATION 25090 W 110TH TERR OLATHE, KS 66061 Kathleen.Ocanas@atmosenergy.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 <u>Shonda.Rabb@ks.gov</u>

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

Randall F. Larkin, Attorney CITY OF LAWRENCE PO Box 708 Lawrence, KS 66044 <u>rlarkin@lawrenceks.org</u>

Brandon McGuire, Asst. City Manager CITY OF LAWRENCE PO Box 708 Lawrence, KS 66044 <u>bmcguire@lawrenceks.org</u>

Kathy Richardson, Sustainability Director CITY OF LAWRENCE PO Box 708 Lawrence, KS 66044 <u>krichardson@lawrenceks.org</u>

TONI WHEELER, DIRECTOR, LEGAL SERVICES DEPT. CITY OF LAWRENCE CITY HALL 6 EAST SIXTH ST LAWRENCE, KS 66044 <u>twheeler@lawrenceks.org</u>

DOROTHY BARNETT CLIMATE & ENERGY PROJECT PO BOX 1858 HUTCHINSON, KS 67504-1858 <u>barnett@climateandenergy.org</u>

CATHRYN J. DINGES, SR DIRECTOR & REGULATORY AFFAIRS COUNSEL EVERGY KANSAS CENTRAL, INC 818 S KANSAS AVE PO BOX 889 TOPEKA, KS 66601-0889 <u>Cathy.Dinges@evergy.com</u>

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

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

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

SARAH C. OTTO FOULSTON SIEFKIN LLP 7500 COLLEGE BOULEVARD, STE 1400 OVERLAND PARK, KS 66201-4041 <u>sotto@foulston.com</u>

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

C. EDWARD WATSON, ATTORNEY FOULSTON SIEFKIN LLP 1551 N WATERFRONT PKWY STE 100 WICHITA, KS 67206-4466 cewatson@foulston.com

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

Kevin M Fowler, Counsel Frieden & Forbes, LLP 1414 SW Ashworth Place Ste 201 Topeka, KS 66604 kfowler@fflawllp.com

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

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

JUSTIN GRADY, CHIEF OF REVENUE REQUIREMENTS, COST OF SERVICE & FINANCE KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Justin.Grady@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 <u>Carly.Masenthin@ks.gov</u>

JANET BUCHANAN, DIRECTOR OF RATES & REGULATORY

KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC. 7421 W 129TH STREET OVERLAND PARK, KS 66213 janet.buchanan@onegas.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 Iorna.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 <u>robert.vincent@onegas.com</u>

PAUL MAHLBERG, GENERAL MANAGER KANSAS MUNICIPAL ENERGY AGENCY 6300 W 95TH ST OVERLAND PARK, KS 66212-1431 <u>mahlberg@kmea.com</u>

TERRI J PEMBERTON, GENERAL COUNSEL KANSAS MUNICIPAL ENERGY AGENCY 6300 W 95TH ST OVERLAND PARK, KS 66212-1431 pemberton@kmea.com

DARREN PRINCE, MANAGER, REGULATORY & RATES KANSAS MUNICIPAL ENERGY AGENCY 6300 W 95TH ST OVERLAND PARK, KS 66212-1431 prince@kmea.com

JAMES GING, DIRECTOR ENGINEERING SERVICES KANSAS POWER POOL 100 N BROADWAY STE L110 WICHITA, KS 67202 jging@kpp.agency COLIN HANSEN, CEO/GENERAL MANAGER KANSAS POWER POOL 100 N BROADWAY STE L110 WICHITA, KS 67202 chansen@kpp.agency

LARRY HOLLOWAY, ASST GEN MGR OPERATIONS KANSAS POWER POOL 100 N BROADWAY STE L110 WICHITA, KS 67202 <u>Iholloway@kpp.agency</u>

ALISSA GREENWALD, ATTORNEY KEYES & FOX LLP 1580 LINCOLN STREET STE 1105 DENVER, CO 80203 AGREENWALD@KEYESFOX.COM

JASON KEYES, PARTNER KEYES & FOX LLP 580 CALIFORNIA ST 12TH FLOOR SAN FRANCISCO, CA 94104 JKEYES@KEYESFOX.COM

PATRICK PARKE, CEO MIDWEST ENERGY, INC. 1330 Canterbury Rd PO Box 898 Hays, KS 67601-0898 patparke@mwenergy.com

AARON ROME, VP OF ENERGY SUPPLY MIDWEST ENERGY, INC. 1330 CANTERBURY DRIVE PO BOX 898 HAYS, KS 67601-0898 <u>arome@mwenergy.com</u>

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 <u>rlowe@morrislaing.com</u>

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

ASHOK GUPTA, EXPERT NATIONAL RESOURCES DEFENSE COUNCIL 20 N WACKER DRIVE SUITE 1600 CHICAGO, IL 60606 agupta@nrdc.org

DAN BRUER, EXECUTIVE DIRECTOR NEW ENERGY ECONOMICS 1390 YELLOW PINE AVE BOULDER, CO 80305 DAN.BRUER@NEWENERGYECONO MICS.ORG

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 <u>gwright@prioritypower.com</u>

JAMES OWEN, COUNSEL RENEW MISSOURI ADVOCATES 915 E ASH STREET COLUMBIA, MO 65201 JAMES@RENEWMO.ORG

TIMOTHY J LAUGHLIN, ATTORNEY SCHOONOVER & MORIARTY, LLC 130 N. CHERRY STREET, STE 300 OLATHE, KS 66061 tlaughlin@schoonoverlawfirm.com

Peggy A. Trent, Chief County Counselor The Board of County Commissioners of Johnson County 111 S. Cherry Ste 3200 Olathe, KS 66061 peg.trent@jocogov.org

ROBERT R. TITUS TITUS LAW FIRM, LLC 7304 W. 130th St. Suite 190 Overland Park, KS 66213 rob@tituslawkc.com

J.T. KLAUS, ATTORNEY TRIPLETT, WOOLF & GARRETSON, LLC 2959 N ROCK RD STE 300 WICHITA, KS 67226 itklaus@twgfirm.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 <u>TEMCKEE@TWGFIRM.COM</u>

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

DAN LAWRENCE, GENERAL COUNSEL - USD 259 UNIFIED SCHOOL DISTRICT 259 903 S EDGEMOOR RM 113 WICHITA, KS 67218 <u>dlawrence@usd259.net</u>

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

<u>|s| Cathy J Dinges</u>

Cathy J. Dinges