

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

DIRECT TESTIMONY OF

JEFF MARTIN

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

**IN THE MATTER OF THE APPLICATION OF EVERGY
KANSAS METRO, INC., EVERGY KANSAS SOUTH, INC.
AND EVERGY KANSAS CENTRAL, INC. TO MAKE CERTAIN
CHANGES IN THEIR CHARGES FOR ELECTRIC SERVICE
PURSUANT TO K.S.A. 66-117.**

Docket No. 25-_____ - _____ -TAR

FEBRUARY 11, 2025

1 **I. INTRODUCTION**

2 **Q: Please state your name and business address.**

3 A: My name is Jeff Martin, and my business address is 818 South Kansas Avenue,
4 Topeka, Kansas 66612.

5 **Q: By whom and in what capacity are you employed?**

6 A: I am employed by Evergy Kansas Central, Inc. and serve as Vice President Large
7 Customer Strategy for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro (“Evergy
8 Missouri Metro”), Evergy Missouri West, Inc. d/b/a Evergy Missouri West
9 (“Evergy Missouri West”), Evergy Metro, Inc. d/b/a Evergy Kansas Metro
10 (“Evergy Kansas Metro” or “EKM”), and Evergy Kansas Central, Inc. and Evergy
11 Kansas South, Inc., collectively d/b/a as Evergy Kansas Central (“Evergy Kansas
12 Central” or “EKC”), the operating utilities of Evergy, Inc.

13 **Q: On whose behalf are you testifying?**

14 A: I am testifying on behalf of Evergy Kansas Metro and Evergy Kansas Central
15 (collectively, “Evergy,” or the “Company”).

16 **Q: What are your responsibilities?**

17 A: My responsibilities include coordinating all efforts that relate to the Company’s
18 large customer strategy including, but not limited to, commercial negotiations,
19 large customer outreach and engagement, generation and transmission capacity
20 analysis, and interconnection process development.

1 **Q: Please describe your education, experience, and employment history.**

2 A: I have a Bachelor of Science in Electronic Engineering Technology degree from
3 Pittsburg State University and a Master of Business Administration degree from
4 Kansas State University. I have been with Evergy and its predecessor companies
5 for over 31 years and have held various positions in Field Operations, Information
6 Technology, Regulatory Affairs, and Customer Operations. My current title is
7 Vice President, Large Customer Strategy.

8 **Q: What is the purpose of your Direct Testimony?**

9 A: Throughout my Direct Testimony, I explain in detail the process and strategy the
10 Company used to develop the Large Load Power Service (“LLPS”) Rate Plan and
11 the stakeholder engagement and input Evergy considered. I describe the timeline
12 from initial large customer interest to final interconnection known as “Path to
13 Power.” I explain the Company’s generation procurement strategy for new
14 Schedule LLPS customers that locate in the Company’s service territory, explaining
15 both the short-term procurement strategy, as well as how the Company plans to
16 account for new large load customers through its future integrated resource
17 planning (“IRP”) process. Finally, I discuss the interrelationship between the large
18 customer strategy and the Company’s Limited Large Customer Economic
19 Development Rider (“LEDER”).

1 Power Service rate, Schedule LPS in EKM or Schedule ILP, Industrial and Large
2 Power Service in EKC (collectively referred to as “LPS rates”), or through
3 negotiating individual special contracts with large customers.¹ Under the special
4 contract approach, the Company would negotiate and tailor each contract based on
5 the unique needs and circumstances of each customer, with individual pricing, and
6 rate structures negotiated on a case-by-case basis. All special contracts were filed
7 and approved by the Commission individually.² While this approach worked with
8 a more limited volume of interconnection requests, it is time-consuming. Given
9 today’s volume of large customers, relying on special contracts alone is inefficient
10 and could result in asymmetric commercial approaches from customer to customer.
11 In addition to being administratively burdensome, establishing a more uniform
12 process with pre-established commercial terms will benefit existing customers by
13 ensuring new large customers pay their share and do not expose existing customers
14 to undue risk.

15 The LLPS Rate Plan is designed to consolidate and streamline the
16 interconnection process, while also driving equity and transparency in rate
17 offerings for new large load customers. Three significant large load customers
18 Evergy has recently negotiated with include Google and Meta in Missouri and

¹ The Kansas Corporation Commission (“Commission”) reviews special contracts with large customers pursuant to its Order dated October 3, 2001, in Docket No. 01-GIME-813-GIE.

² The Commission considers the benefits to both customers and shareholders when reviewing special contracts. Docket No. 01-GIME-813-GIE, Order at 2-3 (Oct. 3, 2001). The Commission also considers various factors to determine the cost impact of the special contract on core customers. Those factors include, but are not limited to: the load characteristics of the customer; the presence of an ECA or other risk management tools; the nature of the discount; benefits such as curtailment provisions or use of system non-peak times; the length of the contract; information regarding the terms of the contract; and the existing capacity of the utility. *Id.* at 3.

1 Panasonic in Kansas. It became apparent through the course of negotiating those
2 projects, and engaging with many other large load customers interested in locating
3 in Evergy's jurisdictions, that today's large load customers require a shift in the
4 Company's strategy to address their unique needs. The Company's experience to
5 date also revealed that changes to the commercial and tariff strategy are needed to
6 continue to attract and retain additional large load customers that will bring benefits
7 to the State of Kansas.

8 For example, managing the volume and sophistication of today's large load
9 customers requires additional internal and external resources, and the ability to
10 conduct much more sophisticated analysis than historically required. To
11 accomplish this, the Company assembled a cross-functional team including its
12 regulatory, operations, resource planning (generation and transmission), customer
13 relations, legal, and commercial negotiations teams to create a plan that would
14 address today's large load customers and their unique needs, while ensuring non-
15 participants are protected and do not bear unnecessary risk. As part of this effort, a
16 steering committee of executives met regularly to consider possible iterations of a
17 new rate plan tailored to large load customer needs. These efforts led to the LLPS
18 Rate Plan. Among the various elements of the plan I focus on is the Path to Power,

1 which clearly delineates a large load customer path from the initial project
2 assessment to interconnecting and serving the customer.

3 **Q: Did the Company retain a consultant to assist with developing the LLPS Rate**
4 **Plan?**

5 A: Yes, the Company retained the Brattle Group, an industry-leading energy
6 consulting firm, to assess the national landscape on tariff offerings for large load
7 customers. Brattle conducted a thorough review of other utilities' offerings
8 allowing the Company to assess which strategies would best be suited for Evergy
9 and the region. As Company witness Ives mentions in his Direct Testimony, large
10 load customers often "shop" across utilities and jurisdictions searching for key
11 focus areas including: transparency and experience with large load
12 interconnections; speed to market and availability of energy and capacity;
13 commercial competitiveness and economic development incentives; ease and
14 efficiency of the regulatory process; renewable and clean energy offerings and
15 ability to support the customer's decarbonization goals; availability of bill credits
16 for participating in demand response programs; and, the overall "business
17 friendliness" of a jurisdiction. Given today's landscape, the Company determined
18 a comprehensive review of what other jurisdictions offer was essential to
19 developing the most attractive and balanced large load plan.

20 **Q: Did the Company engage with existing and potential large load customers to**
21 **develop the LLPS Rate Plan?**

22 A: Yes, the Company engaged with existing and potential large load customers to
23 understand their expectations. Through its engagement with large load customers,

1 the Company identified the various objectives I mentioned above as being some of
2 the most important aspects of any offering the Company created.

3 **Q: Did the Company engage with other stakeholders for their input on the LLPS**
4 **Rate Plan?**

5 A: Yes, the Company also engaged with the Commission Staff in both Kansas and
6 Missouri, the Citizens' Utility Ratepayer Board ("CURB"), and the Missouri Office
7 of Public Counsel to get their input on a new rate offering for large load customers.
8 In addition to considering large load customer interests, the Company spent
9 significant time evaluating the interests and needs of existing customers and non-
10 participants to ensure any new program protects non-participants and mitigates
11 potential risks for non-participants.

12 **III. "PATH TO POWER" INTERCONNECTION PROCESS FOR NEW LOAD**

13 **Q: What do you discuss in this section of your testimony?**

14 A: In this section of my testimony, I explain the "Path to Power" interconnection
15 process the Company has developed. This process includes the key milestones,
16 including payments, studies, and contract negotiations, that will occur to support
17 the interconnection of a new large customer.

18 **Q: Is the Company planning to implement changes to the process it uses currently**
19 **to evaluate new prospective load?**

20 A: Yes. Historically, growth on the system occurred in smaller increments and at a
21 slower pace where the Company had the ability to evaluate new prospective
22 customers on an individualized basis. That has changed. The scale and pace of
23 growth in large load has required the Company to transition from individually

1 evaluating new large customers to implementing a more streamlined and holistic
2 study process called the “Path to Power”. The Path to Power process should not
3 only drive efficiencies to help with speed to market, but also facilitate a better
4 system planning process.

5 At a high-level, the Path to Power strategy revolves around three core components:

- 6 • Standardize and streamline the customer intake and evaluation process to create
7 an efficient evaluation and site study process;
- 8 • Leverage the resources of new large customers to meet interim generation
9 capacity needs while new generation is evaluated and brought online through
10 the existing IRP process; and,
- 11 • Work collaboratively with prospective customers to identify existing capacity
12 and infrastructure with existing transfer capability and/or that provides the most
13 optimal interconnection location for that customer.

14 **Q: Please explain how the Path to Power will work under the Company’s LLPS**
15 **Rate Plan.**

16 A: The Path to Power will apply to new loads of 25 MW or greater. Going forward,
17 the Company will study new load in a “cluster” basis with up to four projects at a
18 time moving through the study process, known as the active queue. This will not
19 only help create administrative efficiencies, but also help to better identify system
20 needs on a more holistic basis. The figure below reflects the various stages of the
21 study process the Company plans to complete for each cluster of projects from its
22 queue:

The Path to Power



1

2 **Q: Does the Company plan to evaluate multiple projects/interconnection requests**
3 **at a time?**

4 **A:** Yes. The Company anticipates it may study and negotiate new large load projects
5 in groupings of up to four projects at a time. These groupings may include projects
6 across any of Evergy's Kansas or Missouri jurisdictions, and individual project
7 costs will be allocated on a project-by-project basis. The rationale for evaluating
8 and negotiating projects in groups is to drive administrative efficiencies, while also

1 helping the Company and Southwest Power Pool (“SPP”) better understand the
2 broader system implications of new large customer load.

3 **Q: Please explain the Initial Evaluation Phase.**

4 A: This is the first phase that occurs once a customer expresses interest in locating in
5 the service territory. During this stage, Every personnel provide a high-level
6 assessment of the customer’s project in relation to the system based on the
7 anticipated load ramp for the facility. This typically takes two to four weeks to
8 complete but may take longer for projects with multiple sites. During this phase,
9 the Company intakes as much information as possible about the project and
10 provides the customer with an explanation of its study and interconnection process,
11 then advises on next steps. While the Company may provide indicative pricing, it
12 does not provide formal cost estimates during this phase.

13 **Q: Please explain the Project Details Phase.**

14 A: To proceed to this phase, a project must formally submit details about the project
15 and make a \$200,000 deposit to cover the study costs. Among other things, the
16 customer must provide proof of land rights/acquisition, submit a site plan, and sign
17 a Letter of Agreement (“LOA”). As part of this phase, the Company also gathers
18 all necessary information to submit the project to the SPP for review. Once the
19 necessary information is provided, the LOA is executed and if there is a space
20 available, the project formally enters the active queue. From this point forward, the
21 Company tracks and charges all study costs to a specific project Work Identification
22 (“ID”), with all time and costs associated with studying a particular project billed
23 to the Work ID. To the extent Company costs associated with studying a project

1 surpass the deposit, it will require additional deposit(s) in \$200,000 increments. At
2 the end of this phase, Evergy will provide an indicative price estimate for dedicated
3 facilities that may be needed to serve the customer and construction timeline.

4 **Q: Please explain the Area Qualification (“AQ”) Study Phase.**

5 A: Once the final details have been provided and agreed to, including the prospective
6 customer’s forecasted load ramp, transmission and distribution infrastructure
7 needs, and the Initial Project Activities agreement (“IPA”) has been executed, the
8 project will be submitted to SPP for an AQ study consistent with SPP’s standard
9 process. The AQ study determines if new load can be reliably connected to the grid
10 and identifies any potential transmission upgrades that may be needed to reliably
11 interconnect the facility. This process typically includes a Load Connection Study
12 and Detailed Power Flow Network Study to analyze the impact of the new load on
13 the system. The AQ study takes approximately 90 days to complete.

14 **Q: Please explain the Completion of Projects Phase.**

15 A: During this phase, which may run in parallel with the AQ study phase, the Company
16 works with the customer to negotiate and execute the project agreements needed to
17 support the project. Typically, these agreements include an Interconnection
18 (substation) Agreement, Right-of-way (easement) Agreement, and Facilities
19 Extension (distribution) Agreement depending on the specific needs of each
20 customer. This step typically takes two to six months. The Company relies on
21 relatively standardized terms and conditions as part of these agreements with
22 commercial terms that require the customer to pay all costs associated with
23 dedicated facilities and corresponding financial guarantees that enable the

1 Company to recoup costs from the entity or a guarantor should the customer later
2 decide not to move forward with the project.

3 **Q: Please explain the SPP Submittal and Evaluation Phase.**

4 A: During this stage, Evergy submits the formal load request to SPP, reflecting the
5 new load and its ramp schedule, as well as the necessary technical information
6 related to the project so that SPP can account for the new load in its planning
7 processes. At this stage, SPP will also provide any applicable notices to construct
8 to impacted Transmission Owners.

9 **Q: Please explain what occurs after the SPP Submittal and Evaluation Phase.**

10 A: After the SPP Submittal and Evaluation stage, the necessary facilities are
11 constructed. Once all necessary facilities are in-service, the customer will start
12 taking service under all applicable rates (*i.e.*, Schedule LLPS tariff).

13 **Q: Is the Company proposing any tariff changes to implement the Path to Power?**

14 A: Yes, the Company is proposing to memorialize key milestones of the Path to Power
15 process in the Company General Rules & Regulations, as reflected in an attachment
16 to Company witness Brad Lutz's Direct Testimony. Company witness Lutz also
17 discusses the proposed tariff changes in more detail in his Direct Testimony.

18 **Q: Is the Company proposing any unique provisions to support particular types
19 of customer projects?**

20 A: Yes, the Company plans to implement several modifications to its queue
21 management process to more efficiently study, negotiate, and manage its large load
22 queue. The Company also plans to prioritize "Community Interest Projects" that

1 are expected to bring unique community and economic development benefits and
2 therefore warrant more expedited review.

3 **Q: What is a “Community Interest Project”?**

4 A: For purposes of the LLPS Rate Plan, the Company defines a Community Interest
5 Project as one that is part of a competitive search process where the Company is
6 competing against at least one other location for the project, the customer
7 demonstrates the project will employ at least 250 permanent, full-time employees,
8 and has certification from an accredited state or regional economic development
9 organization indicating that the absence of a deposit and expedited timing are
10 critical to winning the project. The Company also plans to waive the initial deposit
11 requirement for Community Interest Projects.

12 **Q: What is the Company’s rationale for prioritizing Community Interest
13 Projects?**

14 A: Large load Community Interest Projects can bring numerous benefits to the State
15 of Kansas – most notably in terms of job creation and other economic development
16 benefits, such as increased tax base. Often, the state’s economic development
17 agencies or organizations are working tirelessly to attract and incentivize these
18 large employers to Kansas through competitive site selection processes where any
19 advantage can hinge on whether the customer chooses to locate in Evergy’s service
20 territory. By prioritizing these unique projects in the queue and offering to waive
21 the initial deposit, the Company can help make the State of Kansas a more attractive
22 destination to locate, in line with Kansas’s aggressive economic development
23 objectives.

1 **IV. LLPS RATE PLAN GENERATION PROCUREMENT STRATEGY**

2 **Q: Please summarize how the Company plans to accommodate new large load**
3 **customers from a generation planning and procurement perspective.**

4 A: Under Schedule LLPS, the customer is obligated to pay the costs of any interim
5 capacity that the Company procures to serve the customer. The Company will not
6 procure any capacity until it has a signed LLPS Service Agreement with the
7 customer. In the meantime, the Company will leverage its existing IRP process to
8 identify any new generation procurements that will be needed to serve the customer
9 and update its IRP load forecasts as appropriate.

10 **Q: Please explain how Company plans to evaluate, price, and initiate generation**
11 **procurement within the Path to Power process.**

12 A: The Company plans to rely on cross-functional teams to execute the LLPS Rate
13 Plan, as well as the Path to Power process. This means the resource planning team
14 will maintain direct line of sight into the Path to Power queue. As part of its
15 continual and ongoing load forecasting and risk assessment process, the Company's
16 resource planning team will consider the Company's overall queue as it develops
17 various load forecasting scenarios and sensitivities, though it will not begin to
18 procure any energy or capacity until (at the earliest) the SPP Submittal (*i.e.* Network
19 Integration Transmission Service Agreement ("NITSA")) has occurred. More
20 specifically, beginning with the Initial Evaluation Phase, the Company's resource
21 planning team will start to evaluate the potential resource needs to serve a particular
22 customer and/or cluster of customers. The resource planning team will also be
23 included in ongoing discussions with the prospective customers regarding any clean

1 energy program offerings the customer is interested in enrolling in. As Company
2 witness Lutz explains, under Schedule LLPS, if the Company cannot accommodate
3 a new customer's load within a desired timeframe, it may procure interim market
4 capacity for that particular customer which will be direct charged to the customer
5 through an Interim Capacity Charge. This mechanism will enable the Company to
6 serve a customer as soon as they are ready, but also provide time to incorporate the
7 customer's load into the existing IRP process considering any clean energy
8 programs the customer decides to participate in. The Interim Capacity Charge will
9 cover any gap in time for which the Company needs to procure or construct new
10 generation resources to serve its IRP load forecast.

11 **Q: How does this process compare to how the Company has historically planned**
12 **for and procured new generation to serve load growth?**

13 A: Generally, the Company has included an economic development component to the
14 IRP planning process that was based on historical load growth. However, due to
15 the size of Evergy's potential load growth, the Company is considering how to
16 integrate new Schedule LLPS load in future IRP planning process.

17 **Q: Please explain how and when the Company will incorporate new large load**
18 **into its existing IRP process.**

19 A: As a rate-regulated utility, the Company has an obligation to serve its customers,
20 so the appropriate question is not whether the Company will serve new large load,
21 but how. As the Company evaluates potential load growth through the Path to
22 Power process, the resource planning team will compare the new load ramps to the
23 overall generation capacity to understand how it can most cost-effectively serve its

1 customers. Ultimately, the AQ process and the inclusion of the load through the
2 SPP NITSA process I discussed earlier will inform how the IRP planning process
3 incorporates the generation needed to serve these customers. In addition to
4 leveraging the existing IRP process, to the extent new generation is in fact needed,
5 the Company will follow other appropriate regulatory processes, such as
6 Predetermination filings.

7 **Q: Why is the Company not proposing to direct assign generation costs to new**
8 **large load customers?**

9 A: Historically, the grid has been treated as a shared resource as any new generation
10 that is procured to serve new load will be used and shared by all customers, and
11 because the Company has an obligation to serve. However, in situations where
12 customers have unique generation preferences, the Company has crafted a tariff-
13 based approach that enables customer choice and comports with the applicable SPP
14 planning process, while ensuring those customers pay their share of the added and
15 accelerated cost of any such resources. That said, Evergy's long-standing resource
16 planning process includes multiple opportunities for stakeholder and Commission
17 oversight and engagement. Recently, the Company has built this process out to
18 include broad stakeholder engagement as part of its resource plan development and
19 execution. Other existing regulatory processes for interested stakeholders to
20 provide feedback include Predetermination proceedings and general rate
21 proceedings. Combined, these regulatory processes will ensure substantial
22 stakeholder and regulator engagement and oversight, thus providing additional
23 assurances that investments are prudently incurred and are fair and reasonably

1 recovered from all customers receiving service. Direct assignment and negotiated
2 arrangements have the potential to result in suboptimal portfolio utilization and
3 create the potential for investment and recovery risks for all parties. Company
4 witness Mr. Lutz discusses some of the ratemaking and potential rate mitigation
5 benefits to all customers that will result from the addition of new large load,
6 particularly large load with high load factors.

7 **V. ECONOMIC DEVELOPMENT CONSIDERATIONS**

8 **Q: Please summarize the Company’s existing economic development program.**

9 A: In June 2020, the Kansas legislature passed House Bill (“HB”) 2585, codified in
10 K.S.A. 66-101j, which was designed to encourage economic development by
11 authorizing Commission-regulated utilities to offer discounted rates to qualifying
12 customers. In accordance with HB 2585, Evergy filed its Limited Large Customer
13 Economic Development Discount Rider (“Schedule LEDR”). The purpose of
14 Schedule LEDR is to provide discounts from otherwise applicable standard rates
15 for electric service for new or expanded facilities of industrial or commercial
16 customers that are not in the business of selling or providing goods or services
17 directly to the general public. The Commission approved Evergy’s Schedule LEDR
18 in Docket No. 21-EKCE-318-TAR.

19 In April 2024, the Kansas legislature passed HB 2527, which modified the
20 existing economic development provisions in K.S.A. 66-101j. Accordingly, in
21 November 2024, Evergy filed with the Commission modifications to its Schedule
22 LEDR. The modifications relate to the availability criteria and calculation of the

1 economic development discount provided under the tariff. Those modifications are
2 pending Commission approval in Docket No. 25-EKCE-223-TAR.

3 **Q: Please explain the directives in K.S.A. 66-101j concerning economic**
4 **development rate discounts the Company must offer.**

5 A: K.S.A. 66-101j directs the Commission to authorize electric public utilities to
6 implement an economic development discount rate for new or expanded facilities
7 of certain industrial or commercial customers. The economic development discount
8 rate is available to customers with certain peak demand projections. The statute
9 also outlines how the rate must be calculated. Importantly, K.S.A. 66-101j
10 mandates that the difference in revenues resulting from the discounted rates, and
11 revenues that would have been generated without the discounts, are not recoverable
12 in a utility's revenue requirement, except for revenue reductions tracked by the
13 utility prior to July 1, 2024. Additionally, the economic development discount rate
14 is not available to customers that receive contract rates.

15 **Q: Will LLPS customers be eligible to enroll in the LEDR program?**

16 A: Yes, if the customer meets the requirements established in K.S.A. 66-101j.

17 **Q: Has the Company identified any challenges with its current approach to**
18 **economic development rates considering the current volume of large customer**
19 **load interested in locating in its service territory?**

20 A: Yes. The modifications to the EDR under HB 2527 never contemplated the size of
21 the potential customer growth, nor the significance of system investments in
22 response to the large customer load growth that Evergy is currently witnessing. In
23 effect, the EDR, as designed, could create a shortfall in recovery from the full cost

1 to serve a customer taking service under the EDR discount that could burden
2 existing customers in future rate cases based on the size of these economic
3 development projects today. The effect of such a shortfall will be exacerbated by
4 the impacts to the system and all customers of the significant new system
5 investments expected to be required to support higher loads on the system. The
6 combination of the size of the loads being added to the system and the expected
7 cost of new incremental system investments to support the new large load will
8 likely result in an unreasonable subsidy of the new large load customers if the EDR
9 were applied without consideration of the shortfall in recovery of cost to serve or
10 the impact of accelerated system investments on existing customers.

11 **Q: How has the Company crafted the LLPS Rate Plan to ensure it is statutorily**
12 **compliant with HB 2527 and protects existing customers?**

13 A: As I indicated above, if a customer qualifies under K.S.A. 66-101j, the EDR will
14 be applied through the LLPS Rate Plan. To mitigate the potential for cross-
15 subsidization issues I mentioned above, the Company has crafted a minimum bill
16 requirement and non-bypassable System Support Rider. Combined, these ensure
17 that eligible customers can participate in the Company's EDR program, while also
18 mitigating cross-subsidization concerns. Notably, by making the System Support
19 Rider a non-bypassable charge, the Company will avoid a scenario where a
20 Schedule LLPS customer substantially underpays their cost of service. This ensures
21 Schedule LLPS customers are substantially covering the cost to serve them in their
22 tariffed rates before consideration of any acceleration of system investment impacts
23 on existing customers, or any other voluntary riders the LLPS customer enrolls in.

1 Q. Does this conclude your Direct Testimony?

2 A. Yes.

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

VERIFICATION

Jeff Martin, being duly sworn upon his oath deposes and states that he is the Vice President, Large Customer Strategy, for Evergy Inc. that he has read and is familiar with the foregoing Direct Testimony and attests that the statements contained therein are true and correct to the best of his knowledge, information and belief.



Jeff Martin

Subscribed and sworn to before me this 11th day of February, 2025.



Notary Public

My Appointment Expires:

May 30, 2026

