

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

In the Matter of the Capital Plan Compliance)
Docket for Kansas City Power and Light)
Company and Westar Energy, Inc. Pursuant to) Docket No. 19-KCPE-096-CPL
the Commission's Order in 18-KCPE-095-)
MER.)

NOTICE OF FILING OF STAFF'S REPORT AND RECOMMENDATION

COMES NOW, the Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively), and files its Report and Recommendation, dated July 8, 2022, regarding the Capital Investment Plan filed by Evergy Metro, Inc. (Evergy Kansas Metro), Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (together, Evergy Kansas Central) (collectively, Evergy).

In the Report and Recommendation, Staff finds Evergy complied with the requirements of the Capital Plan framework approved by the Commission in the *Order Adopting Integrated Resource Plan and Capital Plan Framework* on February 6, 2020 in this Docket. Staff notes Evergy's total capital expenditure projections are not excessive when compared to other publicly traded electric holding companies.

Staff, however, expresses concern in the Report and Recommendation regarding increased capital expenditure projections in the Capital Plan for the years 2022-2026 for the combined Evergy Kansas Central and Evergy Kansas Metro than were reviewed in the Sustainability Transportation Plan in Docket No. 21-EKME-088-GIE (Docket 21-088) for period covering the years 2020-2024. The capital expenditures are estimated to be \$1.215 billion higher or 21.82% more than the five year Capital Plan contained within the Sustainability Transformation Plan. Staff has highlighted the propensity of Evergy to significantly increase capital expenditure budgets each

year over the last three years and the projected rate impacts from the anticipated growth in total capital expenditures.

Consistent with prior filings, Staff identifies certain trends in Evergy capital expenditures related to projected transmission spending compared to resources going into distribution modernization projects that have greater reliability impacts and reduced rate effects. Staff observes Evergy has plans to make future renewable energy projects utility-owned rather than obtaining renewable energy through Purchased Power Agreements.

To address the pace of Evergy's increasing capital expenditures, Staff makes some additional recommendations beyond its finding that the Commission issue an Order accepting Evergy's Capital Plan framework as compliant with the Order of February 6, 2020 in this Docket. Staff advises Evergy to slow the pace of its increased transmission investment in favor of distribution modernization projects. Staff favors Evergy considering Purchased Power Agreements for renewable energy projects rather than making them utility-owned. Based on an increase of 21.82% in capital expenditures since the Sustainability Transformation Plan, Staff proposes having Evergy be required to file updated and comprehensive financial modeling similar to that provided in Docket 21-088 in order to show how retail rate changes are impacted by continued increases in capital expenditures. Finally, Staff encourages the Commission to consider requiring Evergy to appear in public workshops to explain the upward trend in its capital expenditures to its various stakeholder groups.

Attached to the Notice is Staff's Report and Recommendation dated July 8, 2022. It is offered in conformity with procedures for issuing a Commission Order for the Capital Plan and provides additional comments as previously outlined above.

WHEREFORE, Staff submits its Report and Recommendation for Commission review and consideration and for such other relief as the Commission deems just and reasonable.

Respectfully submitted,
/s/ Walker Hendrix
Walker Hendrix, #08835
Litigation Counsel
1500 SW Arrowhead Rd
Topeka, KS 66604
Phone (785) 271-3157
Email: w.hendrix@kcc.ks.gov

REPORT AND RECOMMENDATION UTILITIES DIVISION

TO: Dwight D. Keen, Chair
Susan K. Duffy, Commissioner
Andrew J. French, Commissioner

FROM: Justin Grady, Chief of Revenue Requirements, Cost of Service and Finance
Jeff McClanahan, Director of Utilities

DATE: July 8, 2022

SUBJECT: Docket No. 19-KCPE-096-CPL –*In the Matter of the Capital Plan Compliance Docket for Kansas City Power and Light Company and Westar Energy, Inc. Pursuant to the Commission’s Order in 18-KCPE-095-MER.*

EXECUTIVE SUMMARY

On February 28, 2022, Evergy Metro, Inc. (Evergy Kansas Metro), Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (the latter two together as Evergy Kansas Central) (all three collectively referred to herein as Evergy) filed their Five Year Capital Investment Plan (Capital Plan). Evergy’s Capital Plan filing was required by the Order Adopting Integrated Resource Plan and Capital Plan Framework, issued by the Kansas Corporation Commission (Commission) on February 6, 2020, in Docket No. 19-KCPE-096-CPL (19-096 Docket).¹ With this Order the Commission approved the Integrated Resource Plan (IRP) and Capital Plan framework that was submitted by Evergy, Staff, and the Citizens Utility Ratepayer Board (CURB).² The framework required Evergy to submit its initial Capital Plan filing on March 9, 2020, with subsequent annual filings due by February 28 of each year. The purpose and structure of the Capital Plan, and the procedure for review of the Capital Plan framework, is provided in detail in Appendix A of the Commission’s February 6, 2020, Order.³

In this Report, Staff evaluates Evergy’s Capital Plan filing for compliance with the Commission-approved reporting framework. Additionally, we will evaluate the changes in Evergy’s Capital

¹ See Order Adopting Integrated Resource Plan and Capital Plan Framework, February 6, 2020, <https://estar.kcc.ks.gov/estar/ViewFile.aspx/20200206105827.pdf?Id=da24762e-a6b9-4288-9cde-09ab47dac275>. Attachment A of the Order contains the IRP and Capital Plan Framework.

² The original Capital Plan framework was submitted on March 1, 2019, with a Joint Supplement and Clarification submitted on September 9, 2019.

³ Each of these elements are discussed in more detail in the Background section of this Report.

Plan that have occurred since Staff's review of the Sustainability Transformation Plan (STP)⁴, and the 2021 Capital Plan.⁵

In this Report, Staff finds that Evergy complied with the requirements of the Capital Plan framework. Additionally, Staff finds that Evergy's five-year Capital Plan contains significantly more (\$1.215 billion or 21.82%) capital expenditures for the combined Evergy Kansas Central and Evergy Kansas Metro, covering the years 2022-2026, than was contained in the financial model evaluated during Staff's review of the STP in the 21-088 Docket, covering the years 2020-2024. The 2022 five-year Capital Plan has also increased by \$1.048 billion (18.27%) over the 2021 five-year Capital Plan, which in turn increased \$1.095 billion (23.60%) over the 2020 five-year Capital Plan.

In evaluating Evergy's Capital Plan, we have compared Evergy's capital expenditure projections to publicly-available capital expenditure projections of other electric utilities, as well as Evergy's regional peers. For the years 2022-2024, Evergy's projected increase in Net Plant as a percentage of existing Net Plant (15.83%), remains below the average electric utility in the U.S. (20.28%) and below the average of its regional peers (16.13%). However, Evergy's ratio of capital expenditures to depreciation and amortization (2.27) has grown to a level that is 7% above its regional peers (2.12). Additionally, Evergy's 2022-2024 capital expenditure projections grew 8.70% over its 2021-2023 projections, whereas the capital expenditure projections of Evergy's regional peers grew by an average of 3.38%.

These trends are highly concerning to Staff. Evergy's propensity over the last three years has been to increase its capital expenditure budgets higher and higher with every iteration. If this continues, we believe it will undermine the goal of achieving regionally competitive rates and reliable electric service, especially against the backdrop of general inflationary pressures being experienced throughout our economy.

In summary, while Evergy's total capital expenditure projections are not excessive relative to other publicly traded electric holding companies, we remain concerned about Evergy's projected level of capital expenditures, the growth trajectory of those expenditures, the projected transmission spend relative to distribution spend, the assumption that future renewable investments will be utility-owned projects instead of Purchased Power Agreements (PPAs) and the projected rate impact of these capital expenditures. We continue to recommend that Evergy slow down its pace of increased transmission investment and shift some of the planned investment towards distribution modernization projects, which would have a greater reliability impact with less impact

⁴ See Staff's Initial Comments; Docket No. 21-EKME-088-GIE (21-088 Docket), <https://estar.kcc.ks.gov/estar/ViewFile.aspx/S202104161339002367.pdf?Id=2da1373e-f5aa-4b0f-af08-692750df758d>.

⁵ See, Staff's Report and Recommendation Regarding Evergy's 2021 Capital Plan, <https://estar.kcc.ks.gov/estar/ViewFile.aspx/S202106291344308614.pdf?Id=9686d3f0-4d41-4c63-b9a8-1be0e13aa01b>.

on rates. We also recommend that Evergy strongly consider PPA arrangements for any additional renewable investments, instead of assuming these projects will be utility-owned. Lastly, given the significant changes that have occurred to Evergy's Capital Plan (increase of 21.82%) since the Commission evaluated the Sustainability Transformation Plan (STP) we recommend that Evergy be required to file updated comprehensive financial modeling akin to what was provided in Docket No. 21-EKME-088-GIE (21-088 Docket) to provide more transparency into Evergy's current expectations of retail rate changes that will result from Evergy's continued increase in capital expenditures. The Commission may also wish to require Evergy to appear in a public workshop to explain the necessity and impact of these increased capital expenditures to public stakeholders.

BACKGROUND

On May 24, 2018, the Commission approved the merger between Westar Energy, Inc. (Westar) and Kansas City Power and Light Company (KCPL) to form the company known today as Evergy.⁶ One of the elements of the Non-Unanimous Settlement Agreement in that Docket (paragraph 50(iv)) called for a Capital Plan reporting Docket in which Evergy would file annually its five-year capital expenditure projections. Staff originally recommended this Capital Plan reporting requirement in response to stakeholder concerns in the merger dockets and previous rate cases regarding the level of Westar and KCPL's capital investment and the resulting rate impacts. These concerns were understandable. In Staff's Rate Study of Westar and KCPL's rates for the years 2008-2018, we found that growth in Net Plant was a significant contributing factor to the growth in both company's rates. Specifically, Westar's Net Plant/Retail MWh grew by the third highest amount of the 23 utility study group, and KCPL's grew by the fourth highest amount.⁷

On February 6, 2020, the Commission approved the Capital Plan framework, contained within Appendix A of the Commission Order. As provided in the Order, the purpose of the Capital Plan framework is:

- To provide the Commission visibility into Evergy's forecast for new investments as well as replacement of aging utility infrastructure; and
- To identify strategic and major capital projects that will set Evergy's short-term and long-term direction.

The Capital Plan framework was structured as follows:

- The Capital Plan will be based on Evergy's five-year budgeting process and practices;
- Capital expenditure projections will include generation, transmission, distribution, and

⁶ Evergy Kansas Central (formerly Westar) and Evergy Kansas Metro (formerly Kansas City Power and Light) are still technically separate utility companies, under common holding company ownership.

⁷ See Study of Kansas City Power and Light and Westar Energy, 2008-2018, pp 6-7, filed January 14, 2019. <https://estar.kcc.ks.gov/estar/ViewFile.aspx/S20190114113704.pdf?Id=0ead0c60-c1c0-4cde-8837-c9fe3823204a>

- general plant investments; and
- There will be more detail in year one with less detail in years two through five, consistent with the structure of Evergy's five-year budget.

In order to demonstrate compliance with the Capital Plan framework, Evergy is required to provide the following items in its annual filings:

- Letter of Transmittal;
- Five Year Summary of Capital Investment Plan by category, consistent with Evergy's other external reporting requirements;
- Year 1 Project Detail of Capital Investment Plan by project, consistent with Evergy's capital project planning process; and
- Comparison of prior year projected versus actual capital investments by project, consistent with Evergy's capital project planning and accounting processes. The comparison will begin with the second filing and each filing thereafter.

Additionally, in response to concerns stated by the Kansas Electric Power Cooperative (KEPCo) and the Citizens Utility Ratepayer Board (CURB) during the review of Evergy's 2020 Capital Plan filing, Evergy committed to provide an explanation of all variances from forecasted amounts in excess of 10% within a category, or \$3 million for an individual project.⁸

Lastly, the Commission's November 23, 2021, Order Closing Investigation into the STP, in the 21-088 Docket, required Evergy to explain the increase in capital expenditure projections announced during its September 21, 2021 Investor Presentation, as well as the impact on the trajectory of retail rates from this increased capital spend.

Once Evergy has submitted its Capital Plan filing, Staff, CURB, and any Intervenor shall review the compliance filing required by this framework and may file responsive comments providing any remarks and/or identifying any concerns regarding the Capital Plan, not later than 120 days after the Capital Plan Report filing date. Parties may file cross-answering comments in response to other parties' comments no later than 30-days after the initial responsive comments. Evergy may file a report responding to the responsive comments filed by each party no later than 180 days after the Capital Plan Report filing date. Lastly, the Commission shall issue an order, which contains findings that Evergy's Capital Plan filing either does or does not demonstrate compliance with the requirements of the Capital Plan framework. The Commission may also address any comments or concerns raised by the parties if it so chooses.

Evergy filed its compliance filing on February 28, 2022, in compliance with the Commission's February 6, 2020, Order. Pursuant to the Capital Plan framework discussed above, responsive

⁸ See, Response of Evergy to Comments Regarding Capital Plan, September 29, 2020, <https://estar.kcc.ks.gov/estar/ViewFile.aspx/S202009291103414262.pdf?Id=c380dff0-5301-4ab4-926c-bc07c7f8ba9b>.

comments were due by 120 day after February 28, 2022, or by June 28, 2022. On June 23, 2022, the Commission approved Staff request to extend the deadline to file comments to July 8, 2022.

ANALYSIS

Staff finds that Evergy's Capital Plan filing, as filed on February 28, 2022, is compliant with the standards established by the Capital Plan framework discussed in the Background section of this Report above. Staff offers the following supplemental comments to aid the Commission in its evaluation of Evergy's Capital Plan filing.

Updated Capital Plan Compared to February 2021 Capital Plan Filing

Evergy's projected capital expenditures for years 2022 to 2026 total \$5.255 billion for Evergy Kansas Central, an increase of \$739 million (16.36%) over the \$4.516 billion projected for the years 2021-2025 as reported in the prior Capital Plan filing made by Evergy in February 2021. For Evergy Kansas Metro, Evergy projects \$1.527 billion in capital expenditures from 2022-2026, an increase of \$309 million (25.36%) over the \$1.218 billion projected for the years 2021-2025 as reported in the prior Capital Plan filing. On page three of each utility's Capital Plan filing, Evergy provides an explanation for the increased capital expenditures in each category. Evergy points to increased levels of company-owned renewables, at higher prices per MW than originally planned. It also points to the Integrated Resource Plan (IRP) for changes in assumed plant retirement dates, and increased transmission replacement as well as distribution pole inspection/replacement. Lastly, Evergy points to a new customer service IT project (Uplight) and various asset management system upgrades.

Updated Capital Plan Compared to STP Capital Plan Evaluation

Evergy's projected capital expenditures for years 2022 to 2026 total \$6.782 billion for Evergy Kansas Central and Evergy Kansas Metro combined. This is approximately 21.82% larger than the total of \$5.567 billion projected for the years 2020 to 2024 for both utilities, as part of the STP. While the combined total is an increase of 21.82%, Evergy Kansas Central's capital expenditures budget increased by approximately 23.70% and Evergy Kansas Metro's capital expenditures budget increased by approximately 15.76%.

Rate Impact of Increased Spending

As part of Evergy's Capital Plan filing, it included an analysis of the rate impact of the \$739 million in Evergy Kansas Central increased capital expenditures projected during this time frame. Assuming the currently authorized pre-tax ROR, Evergy estimates this investment will increase rates by \$93 million in the first year after a rate case, or a 1.1% increase. While Evergy states that it expects Operating and Maintenance (O&M) savings and fuel savings to reduce this figure to below 1%, those figures are not quantified or presented in the filing. Similarly, for Evergy Kansas

Metro, Evergy calculates a \$40 million rate impact associated with its \$309 million increase in budgeted capital expenditures. This also equates to just over 1%, which Evergy anticipates will fall to just under 1% as a result of undisclosed O&M and fuel savings.⁹ It should be noted that these rate increase calculations do not purport to reflect all Evergy projected capital expenditures, instead they only reflect the increase in capital expenditures announced by Evergy since the 2021 Capital Plan.

Evergy Capital Expenditures Compared to Other Electric Utilities

Staff performed an evaluation of the capital expenditure projections contained in Evergy’s Capital Plan compared to the publicly available capital expenditure projections of other electric only holding companies/utilities. This analysis is recreated in the table below.

Electric Only Holding Company Capital Expenditure Analysis										
	A		B		C		D		E	
	2021 Depr. and Amort. (millions\$)	Rank	2021 Net PPE (millions\$)	Rank	Capex 3 Year Total 2022-2024 (millions\$)	Rank	Average 2022-2024 Cap Ex/2021 Depr. and Amort.	Rank	2022-2024 Growth in Net PPE as a % of 2021 PPE	Rank
Eversource Energy	\$ 1,103	8	\$ 24,659	7	\$ 13,743	5	4.15	1	42.31%	1
IDACORP, Inc.	\$ 179	16	\$ 4,701	14	\$ 1,848	14	3.44	2	27.89%	2
NextEra Energy, Inc.	\$ 3,924	2	\$ 56,623	3	\$ 33,175	1	2.82	3	37.80%	3
PNM Resources, Inc.	\$ 320	13	\$ 5,594	13	\$ 2,679	12	2.79	4	30.73%	4
American Electric Power Company, Inc.*	\$ 2,826	3	\$ 63,529	2	\$ 22,680	3	2.68	5	22.36%	5
Edison International	\$ 2,288	4	\$ 49,883	4	\$ 17,300	4	2.52	7	20.92%	6
FirstEnergy Corp.	\$ 1,302	6	\$ 30,647	6	\$ 10,250	7	2.62	6	20.70%	7
Otter Tail Corporation*	\$ 91	17	\$ 1,906	17	\$ 662	17	2.42	8	20.41%	8
OGE Energy Corp.*	\$ 416	11	\$ 9,529	11	\$ 2,850	11	2.28	9	16.81%	9
Evergy Inc.	\$ 896	9	\$ 21,558	9	\$ 6,100	8	2.27	10	15.83%	10
Pinnacle West Capital Corporation	\$ 719	10	\$ 16,890	10	\$ 4,700	10	2.18	11	15.06%	11
Exelon Corporation	\$ 5,442	1	\$ 65,683	1	\$ 26,025	2	1.59	15	14.77%	12
Hawaiian Electric Industries, Inc.	\$ 279	14	\$ 3,999	15	\$ 1,328	15	1.59	16	12.28%	13
Entergy Corporation*	\$ 2,243	5	\$ 43,176	5	\$ 12,015	6	1.79	12	12.24%	14
PPL Corporation	\$ 1,121	7	\$ 24,227	8	\$ 5,950	9	1.77	13	10.68%	15
PG&E Corporation	\$ 404	12	\$ 7,005	12	\$ 1,960	13	1.62	14	10.68%	16
ALLETE, Inc.*	\$ 232	15	\$ 3,272	16	\$ 985	16	1.42	17	8.83%	17
Avg. Ex Evergy	\$ 1,431		\$ 25,708		\$ 9,884		2.35		20.28%	
Average Regional Peers Ex Evergy	\$ 1,162		\$ 24,282		\$ 7,838		2.12		16.13%	

Sources: S&P Global Market Intelligence, FERC Form 1 Data

* Indicates a Regional Peer Holding Company included in KCC Staff's Rate Study

What this analysis indicates is that Evergy’s capital expenditure projections remain comparable to other publicly-traded electric utilities and its regional peers. In other words, while Evergy’s budgeted capital expenditures have increased significantly since the STP evaluation, so have the budgeted capital expenditures of its peers. While Evergy’s capital expenditures as a percentage of its existing net plant at 15.83% (a proxy for relative rate base growth) remains below the average

⁹ See page three of the Transmittal Letter accompanying the Capital Plan filing.

of its regional peers at 16.13%, its capital expenditures to depreciation and amortization ratio of 2.27 (a proxy for absolute rate base growth) has now exceeded the regional peer average of 2.12 by 7%.

Staff's Comments in Response to Evergy's Updated Capital Expenditure Projections

The recent increases in Evergy's capital expenditure projections are highly concerning to Staff. Evergy's propensity over the last three years has been to increase its capital expenditure budgets higher and higher at every iteration. If this continues, we believe it will undermine the goal of achieving regionally competitive rates and reliable electric service in Kansas, especially against the backdrop of general inflationary pressures being experienced throughout the economy.

While Evergy's total capital expenditure projections and proxy rate base growth levels are not overly excessive relative to other publicly-traded electric utilities, we remain concerned about Evergy's projected level of capital expenditures, the growth trajectory of those expenditures, the projected transmission spend relative to distribution spend, the assumption that future renewable investments will be utility-owned projects instead of Purchased Power Agreements (PPAs) and the projected rate impact of these capital expenditures.

If Evergy's regional peers are increasing their projected capital expenditures, Evergy has an opportunity to hold the line on capital expenditures in order to make further progress on the goal of achieving regionally competitive rates and reliable electric service. Instead, Evergy's projected capital expenditures grew even *faster* than its peers since last year. Specifically, if we compare average projected capital expenditures of Evergy's regional peers for the years 2022-2024 (\$7.838 billion) and compare that to last years' average of 2021-2023 (\$7.582 billion), we see that average grew by 3.38% over the last year. Evergy's projected capital expenditures for these same time frames grew by 8.70%.¹⁰ Another way to look at this is the ratio of projected capital expenditures to depreciation and amortization, a rough proxy for absolute rate base growth. Evergy's regional peers *shrank* this ratio from an average of 2.17 last year to an average of 2.12 this year. Evergy on the other hand, *grew* this ratio from 2.17 last year to 2.27 this year.

We continue to recommend that Evergy slow down its pace of increased transmission investment and shift some of the planned investment towards distribution modernization projects, which would have a greater reliability impact with less impact on rates. We also recommend that Evergy strongly consider PPA arrangements for any additional renewable investments, instead of assuming these projects will be utility-owned. Lastly, given the significant increases that have occurred in Evergy's Capital Plan (increase of 21.82%) since the Commission evaluated the STP we recommend that Evergy be required to file updated and comprehensive financial modeling akin to what was provided in the 21-088 Docket to provide more transparency into Evergy's current expectations of retail rate changes that will result from Evergy's continued increase in capital

¹⁰ \$6.1 billion (2022-2024) versus \$5.612 billion (2021-2023).

expenditures. The Commission may also wish to require Evergy to appear in a public workshop to further explain the necessity and rate impact of these increased capital expenditures to its public stakeholders.

RECOMMENDATION

Staff recommends the following:

1. The Commission should issue an Order accepting Evergy's Capital Plan filing as compliant with the Capital Plan framework established by the Commission in the February 6, 2020, Order.
2. Staff continues to recommend that Evergy slow down the pace of its increased transmission investment and shift some of the planned investment towards distribution modernization projects, which would have a greater reliability impact with less impact on customer rates.
3. We recommend that Evergy strongly consider PPA arrangements for any additional renewable investments, instead of assuming these projects will be utility-owned.
4. Given the significant increases that have occurred in Evergy's Capital Plan (increase of 21.82%) since the Commission evaluated the STP we recommend that Evergy be required to file updated and comprehensive financial modeling akin to what was provided in the 21-088 Docket to provide more transparency into Evergy's current expectations of retail rate changes that will result from Evergy's continued increase in capital expenditures.
5. The Commission should consider requiring Evergy to appear in a public workshop to further explain the necessity and rate impact of these increased capital expenditures to its public stakeholders.

CERTIFICATE OF SERVICE

19-KCPE-096-CPL

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Staff's Report and Recommendation was served via electronic service this 8th day of July, 2022, to the following:

JOSEPH R. ASTRAB, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
j.astrab@curb.kansas.gov

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
t.love@curb.kansas.gov

DAVID W. NICKEL, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.nickel@curb.kansas.gov

SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
s.rabb@curb.kansas.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.smith@curb.kansas.gov

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

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

CATHY DINGES, ATTORNEY
EVERGY METRO, INC
D/B/A EVERGY KANSAS METRO
One Kansas City Place
1200 Main St., 19th Floor
Kansas City, MO 64105
cathy.dinges@evergy.com

ROGER W. STEINER, CORPORATE COUNSEL
EVERGY METRO, INC
D/B/A EVERGY KANSAS METRO
One Kansas City Place
1200 Main St., 19th Floor
Kansas City, MO 64105
roger.steiner@evergy.com

TERRY M. JARRETT, ATTORNEY AT LAW
HEALY LAW OFFICES, LLC
3010 E BATTLEFIELD
SUITE A
SPRINGFIELD, MO 65804
terry@healylawoffices.com

CERTIFICATE OF SERVICE

19-KCPE-096-CPL

HEATHER H STARNES, ATTORNEY
HEALY LAW OFFICES, LLC
12 Perdido Circle
Little Rock, AR 72211
heather@healylawoffices.com

BRIAN NOLAND
IBEW LOCAL 304, KANSAS CITY, MO
117 W. 20th St., Ste. 201
Kansas City, MO 64108
noland.brian@gmail.com

JOHN GARRETSON, BUSINESS MANAGER
IBEW LOCAL UNION NO. 304
3906 NW 16TH STREET
TOPEKA, KS 66615
johng@ibew304.org

KIMBERLY B FRANK, COUNSEL
K&L Gates, LLP
1601 K STREET NW
WASHINGTON, DC 20006
kimberly.frank@klgates.com

NATHAN HOWE
K&L Gates, LLP
One Newark Center
1085 Raymond Blvd.
Newark, NJ 07102
nathan.howe@klgates.com

TERESA A. WOODY
KANSAS APPLESEED CENTER FOR LAW AND JUSTICE,
INC.
211 E. 8th Street
Suite D
Lawrence, KS 66044
twoody@kansasappleseed.org

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

MICHAEL NEELEY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
m.neeley@kcc.ks.gov

SUSAN B. CUNNINGHAM, SVP, REGULATORY AND
GOVERNMENT AFFAIRS, GENERAL COUNSEL
KANSAS ELECTRIC POWER CO-OP, INC.
600 SW CORPORATE VIEW
PO BOX 4877
TOPEKA, KS 66604-0877
scunningham@kepco.org

MARK DOLJAC, DIR RATES AND REGULATION
KANSAS ELECTRIC POWER CO-OP, INC.
600 SW CORPORATE VIEW
PO BOX 4877
TOPEKA, KS 66604-0877
mdoljac@kepco.org

REBECCA FOWLER, MANAGER, REGULATORY AFFAIRS
KANSAS ELECTRIC POWER CO-OP, INC.
600 SW CORPORATE VIEW
PO BOX 4877
TOPEKA, KS 66604-0877
rfowler@kepco.org

JAMES GING, DIRECTOR ENGINEERING SERVICES
KANSAS POWER POOL
100 N BROADWAY STE L110
WICHITA, KS 67202
jging@kpp.agency

CERTIFICATE OF SERVICE

19-KCPE-096-CPL

LARRY HOLLOWAY, ASST GEN MGR OPERATIONS
KANSAS POWER POOL
100 N BROADWAY STE L110
WICHITA, KS 67202
lholloway@kpp.agency

TIMOTHY J LAUGHLIN, ATTORNEY
LONG & ROBINSON, LLC
1800 BALTIMORE AVENUE STE 500
KANSAS CITY, MO 64108
tlaughlin@longrobinson.com

TIMOTHY S. MAIER, GENERAL MANAGER
MCPHERSON BOARD OF PUBLIC UTILITIES
401 W KANSAS AVE
PO BOX 768
MCPHERSON, KS 67460
timm@mcphersonpower.com

WILLIAM DOWLING, VP ENGINEERING & ENERGY
SUPPLY
MIDWEST ENERGY, INC.
1330 CANTERBURY DRIVE
PO BOX 898
HAYS, KS 67601-0898
bdowling@mwenergy.com

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

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

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

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

ANDREW O. SCHULTE, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
aschulte@polsinelli.com

ROBERT V. EYE, ATTORNEY AT LAW
ROBERT V. EYE LAW OFFICE, LLC
4840 Bob Billings Pkwy, Ste. 1010
Lawrence, KS 66049-3862
bob@kauffmaneye.com

SCOTT L. BROWN
SCOTT L. BROWN, Attorney
475 New Brotherhood Bldg.
753 State Avenue
Kansas City, KS 66101
slb@blake-uhlig.com

SUNIL BECTOR, ATTORNEY
SIERRA CLUB
2101 WEBSTER, SUITE 1300
OAKLAND, CA 94312-3011
sunil.bector@sierraclub.org

CERTIFICATE OF SERVICE

19-KCPE-096-CPL

TONY MENDOZA
SIERRA CLUB
2101 WEBSTER, SUITE 1300
OAKLAND, CA 94312-3011
tony.mendoza@sierraclub.org

CONNOR A. THOMPSON
SMITHYMAN & ZAKOURA, CHTD.
7400 W. 110th St.
OVERLAND PARK, KS 66210-2362
connor@smizak-law.com

JAMES P. ZAKOURA, ATTORNEY
SMITHYMAN & ZAKOURA, CHTD.
7400 W. 110th St.
OVERLAND PARK, KS 66210-2362
jim@smizak-law.com

DAVID RICHARDSON, SR. FINANCIAL ADVISOR
THE COUNCIL FOR THE NEW ENERGY ECONOMICS
1390 YELLOW PINE AVENUE
BOULDER, CO 80304
david.richardson@newenergyeconomics.org

ROBERT TITUS, ATTORNEY
TITUS CONNORS, LLC
6600 W 95TH STREET, SUITE 200
OVERLAND PARK, KS 66212
rob@tituslawkc.com

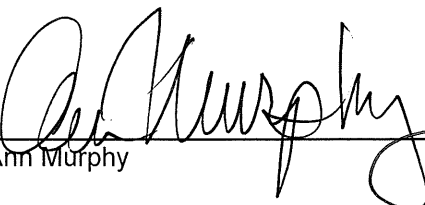
J.T. KLAUS, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
jtklaus@twgfirm.com

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
temckee@twgfirm.com

FRED WICKHAM
WICKHAM & WOOD, LLC
107 W. 9th Street, 2nd Floor
Kansas City, MO 64105
fred@wickham-wood.com

BRIAN WOOD
WICKHAM & WOOD, LLC
107 W. 9th St., 2nd Flr.
Kansas City, MO 64105
brian@wickham-wood.com


Ann Murphy