

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

In the Matter of the Application of Evergy)
Kansas Metro, Inc., Evergy Kansas South, Inc.)
and Evergy Kansas Central, Inc. for Approval of) Docket No. 22-EKME-254-TAR
its Demand-Side Management Portfolio)
Pursuant to the Kansas Energy Efficiency)
Investment Act (“KEEIA”), K.S.A. 66-1283.)

**REPORT ON FEDERAL FUNDING ON BEHALF OF
KANSAS ENERGY OFFICE, EVERGY KANSAS METRO, INC.,
EVERGY KANSAS SOUTH, INC. AND EVERGY KANSAS CENTRAL, INC.**

COMES NOW Kansas State Energy Office (“SEO”), Evergy Kansas Metro, Inc., Evergy Kansas South, Inc. and Evergy Kansas Central, Inc. (“Evergy”) and files with the State Corporation Commission of the State of Kansas (“Commission”) this collaborative Report on Federal Funding pursuant to the Commission’s Order issued September 1, 2023.

I. INTRODUCTION

On September 1, 2023, the Kansas Corporation Commission (“KCC”) approved Evergy’s Kansas Energy Efficiency Investment Act (“KEEIA”) portfolio represented in the Initial Program Settlement and Initial Financial Settlement (“Order”), with certain modifications and conditions, stating, *“Prior to implementation of programs, and within 60 days of this Order, Evergy and Staff shall confer and report to the Commission on any developments regarding federal funding opportunities and whether such developments warrant modification of this Order.”* This report serves as formal written communication to inform the KCC that Evergy and SEO have engaged in collaborative discussions regarding federal funding and its impact to Evergy’s conditionally approved KEEIA programs, and provide this Report as ordered by the KCC.

The federal funding opportunities that the KCC refers to in its September 1, 2023 Order is

interpreted to represent two main federal programs focused on energy efficiency for residential homes. Brief descriptions of these programs are:

- The Inflation Reduction Act (“IRA”) ¹ includes [two provisions authorizing \\$8.8 billion in rebates](#) for home energy efficiency and electrification projects to be managed through Department of Energy (“DOE”). These two provisions, collectively referred to as IRA Home Energy Rebates, are:
 - Section 50121: Home Energy Performance-Based, Whole House Rebates, which are referred to as Home Efficiency Rebates (“HOMES”)
 - Section 50122: High-Efficiency Electric Home Rebate Program, which are referred to as Home Electrification and Appliance Rebates (“HEEHRA”)

Additionally, the Bipartisan Infrastructure Law (“BIL”) enacted federally in 2021 includes a significant increase of \$3.5 billion for supporting the federal Weatherization Assistance Program (“WAP”). This is an expansion of an existing program managed through federal DOE, and it is currently offered in Kansas by a local community agency.

- Section 40551: Weatherization Assistance Program

The scope of this report includes the following:

- Developments regarding federal funding opportunities
 - Overview of IRA Home Energy Rebates
 - Comparison of KEEIA programs and IRA Home Energy Rebates
 - Applicability of fuel switching
 - Estimated impact of IRA Home Energy Rebates for Kansans
 - Overview of WAP and additional funding synergies

¹ Inflation Reduction Act (“IRA”) was signed into law by President Joseph Biden on August 16, 2022.

- Next steps and recommendation regarding KCC's request of any modifications of the Order resulting from federal funding opportunities.

II. EXECUTIVE SUMMARY

There are multiple sources of new and existing federal funding for energy efficiency, primarily in the income-qualified residential sector, secondarily for non-income-qualified residents and the least support for businesses. With respect to the income-qualified area, funds are already being deployed to support the Kansas WAP. The IRA Home Energy Rebates have not yet been deployed by the state of Kansas due to the federal guidance schedule; however, the SEO is planning to apply for that program. The SEO has shared that it does not anticipate applying for any federally supported business rebates that may become available as competitive grants.

There are overlaps and similarities between KEEIA and federal funds, as well as differences. A large proportion of the Home Energy Rebates are dependent on income, whereas the KEEIA programs offer options for all customers to make energy efficient upgrades. HEEHRA rebates are available only to low- or moderate- income households with several end-use measures that allows fuel switching for heat pump installations. In contrast, the Order requires like-for-like heating upgrades. The HOMES rebates are available to households of any income level with a minimum targeted percentage to be low-income. Given the upgrades reach a percentage reduction of energy savings, rebate amounts double for low- and moderate-income households and the rebate amounts increase as energy savings increase. For income-qualified customers, the entire cost will likely be covered for upgrades through either HEEHRA or HOMES. For non-income-qualified customers, the rebates will be capped at 50% of the project cost. This remaining customer out-of-pocket expense could be offset by Evergy's KEEIA rebates to reduce the amount the customer is required to pay.

Evergy has performed initial calculations to assess the customer participation impact of the federal funding opportunities. For example, Evergy estimates 8,462 Evergy Kansas residential customers (over the 7-year period) may benefit from the IRA Home Energy Rebates² and assumes all 8,462 customers receive comprehensive upgrades and the maximum allowable rebate. In contrast, Evergy has estimated 240,000 customers will participate in the KEEIA programs over the 4-year period. For those Evergy Kansas residents who cannot achieve the percentage of energy reduction in their home per the IRA guidelines or who do not want to participate in a comprehensive energy efficiency upgrade, the customer may choose to participate solely in Evergy's programs.

Much is yet to be determined regarding the IRA Home Energy Rebates. Staff, Evergy and Kansas SEO are continuing to monitor how other states are considering deployment of the federal funds and how that may be coordinated with utility energy efficiency funds. The deadline for the SEO to submit its Letter of Intent is August 16, 2024, with an application deadline of January 31, 2025. **Given this and the points noted above, at this time, Staff, Kansas SEO and Evergy are not recommending any changes or modification to the KCC's Order of the conditionally approved KEEIA portfolio. Staff, Kansas SEO and Evergy will continue to engage and discuss any new or changing developments.**

III. OVERVIEW OF IRA HOME ENERGY REBATES

Evergy, KCC Staff and Kansas State Energy Office ("SEO") met on September 19, 2023, to discuss the status of the federally funded programs established by the IRA in 2022.

States and territories are responsible for the design and proposed implementation strategies prior to applying for the IRA Home Energy Rebates and then administering the IRA Home Energy

²Includes both HOMES and HEEHRA programs.

Rebates that will make the rebates accessible to households. The IRA allocation for HOMES and HEEHRA programs for Kansas is \$53.0 million and \$52.7 million, respectively. The DOE published program requirements and application guidance for the IRA Home Energy Rebates programs on July 27, 2023. This recent DOE guidance strongly encourages states to leverage utility and other funding in support of the HOMES and HEEHRA programs just as they encourage it for WAP.³

Other key dates for state applications include:

- January 31, 2024 – Contractor Training Grants applications due;
- August 16, 2024 – Notification if state is accepting or denying funds;
- January 31, 2025 – Deadline for state to submit IRA Home Energy Rebates application to DOE.

To complete the application for the funding, the SEO’s application must include different supporting plans. These plans need to cover the areas of community benefits, consumer protection, education and outreach, utility data access plan, privacy and security risk assessment, market transformation, and possibly others.

IV. KEEIA PROGRAMS AND IRA HOME ENERGY REBATES COMPARISON

The IRA Home Energy Rebates guidance affirms that utility programs and the federal rebates should be combined and that utility programs should be “showcased” to provide value to households and communities for long-term outcomes for more affordable, efficient, resilient, and low-carbon homes⁴. This can be most effective when the IRA Home Energy Rebates and utility program eligibilities match or overlap, which will make the stacking or layering of rebates more

³ Home Energy Rebates Program Requirements and Application Instructions, p. 43

⁴ Inflation Reduction Act Home Energy Rebates Program Requirements and Application Instructions, p. 5, Section 1.5, July 27, 2023.

straightforward for the customer. The DOE also suggests that funds should be used to approach the home envelope⁵ first such that the home is weatherized prior to any energy efficiency upgrades to assure that maximum energy savings are being achieved. While additional guidance is needed from the DOE on stacking funds to maximize rebates, the DOE has stated that the IRA Home Energy Rebates funds cannot be stacked with other IRA Home Energy Rebates funds for the same equipment or end-use measure. Additionally, the total rebate to the homeowner cannot exceed the total project cost.

To first understand if there is any duplicity in rebates between the KEEIA programs and the IRA Home Energy Rebates, Evergy has reviewed the measures within the DOE guidance and has compared characteristics.

The IRA Home Energy Rebates include the following:

End Use Measure	HEEHRA	HOMES	Evergy KEEIA Measure?
Heat Pump HVAC	\$8,000*	All measures can be included as part of a package to hit modeled energy savings of at least 20% with bonus incentives to achieve higher modeled energy savings	Yes; like-for-like
Heat Pump Water Heater	\$1,750*		Yes; like-for-like
Electric Stove/Cooktop	\$840*		Potentially; like-for-like
Heat Pump Clothes Dryer	\$840*		Potentially; like-for-like
Panel Upgrade	\$4,000		Potentially with Smart Panels
Electric Wiring	\$2,500		No
Insulation & Air Sealing	\$1,600		Yes
Total Max Rebate	\$14,000	See HOMES Rebate Breakdown Below	n/a
*Kansas SEO has shared that these end-use measures will not be included for rebates as offered to Kansans			

⁵ A building, or house, envelope is everything that separates the internal building from the external environment, including the roof, doors, windows, floors, and walls. For example, high insulation in the walls, high-efficiency windows, and sufficiently sealed gaps increase the effectiveness of the building, or house, envelope.

HEEHRA rebates are income-qualified and 100% of project cost may be covered for low-income customers who are <80% AMI⁶, or 50% for moderate income customers who are 80-150% AMI
Funds may be used to supplement, and no funds may be used to supplant, weatherization activities under the Weatherization Assistance Program for Low-Income Persons⁷

As shown in the above table, there is slight overlap in programs offered between the IRA Homes Energy Rebates and KEEIA programs. There is additional opportunity for the Kansas SEO to define requirements in its application that will further eliminate any overlap⁸ and/or complement the overlap with allowable braiding of funds.

While HOMES and HEEHRA offer both market rate and income-eligible rebate programs, KEEIA offers measure specific rebates to customers who might not otherwise receive federal funding. Within KEEIA there are measure specific options for all customers. Therefore, if there is a specific energy efficiency upgrade a customer wants to make to their home, Evergy’s KEEIA programs will provide an opportunity for a rebate if they do not meet the required percent reduction in savings through the federal programs. In addition, KEEIA rebates could be braided with the HOMES funding, when there are remaining out-of-pocket project costs to be paid by the resident.

The table below summarizes the Modeled HOMES Rebate program to provide further insight into the percent energy savings reduction required for federal rebates. The Modeled HOMES Rebate is a program path that uses calibrated home energy models consistent with the BPI-2400⁹ standard to estimate energy savings prior to the upgrades, providing rebates for the home based on the percent reduction that the model estimates.

Modeled HOMES Rebate Breakdown

⁶ Area Median Income (“AMI”)

⁷ Home Energy Rebates Programs Requirements & Application Instructions, pg. 89

⁸ Inflation Reduction Act Home Energy Rebates Program Requirements and Application Instructions, Page 5, Section 1.5, July 27, 2023.

⁹ Building Performance Institute BPI-2400-S-2015, Pgs. 1-20

Single Family Homes with 20-34% Modeled Energy Savings	Less than 80% AMI	Rebate amount: Lesser of \$4,000 or 80% of project cost
	80% AMI or greater	Rebate amount: Lesser of \$2,000 or 50% of project cost
Single Family Homes with 35% or greater Modeled Energy Savings	Less than 80% AMI	Rebate amount: Lesser of \$8,000 or 80% of project costs
	80% AMI or greater	Rebate amount: Lesser of \$4,000 or 50% of project cost
Multi Family Residence with 20-34% Modeled Energy Savings	Building with at least 50% of households with income of less than 80% AMI	Rebate amount: Lesser of \$4,000 per dwelling unit or 80% of project cost
	Building with at least 50% of households with incomes 80% AMI and greater	Rebate amount: \$2,000 per dwelling up to \$200,000 per building
Multi Family Residence with 35% or greater Modeled Energy Savings	Building with at least 50% of households with income of less than 80% AMI	Rebate amount: Lesser of \$8,000 per dwelling unit or 80% of project cost
	Building with at least 50% of households with incomes 80% AMI and greater	Rebate amount: \$4,000 per dwelling up to \$400,000 per building

The Measured HOMES Rebate uses a measurement that is approved by the DOE to measure home energy savings after the installation of the upgrades. Based on these measurements and the percent reduction of energy usage the rebates will then be provided accordingly, as shown below:

Measured HOMES Rebate Breakdown		
Single Family Homes with 15% or greater Measured Energy Savings	Less than 80% AMI	kWh, or kWh equivalent, payment rate equal to \$4,000 for a 20% reduction of energy use for the average home in the State or 80% of project cost

	80% AMI or greater	kWh, or kWh equivalent, payment rate equal to \$2,000 for a 20% reduction of energy use for the average home in the State or 50% of project cost
Multi Family Homes with 15% or greater Measured Energy Savings	A building with at least 50% of households with incomes less than 80% AMI	kWh, or kWh equivalent, payment rate equal to \$4,000 for a 20% reduction of energy use per dwelling for the average multifamily building in the State or 80% of project cost
	A building with at least 50% of households with incomes 80% AMI and greater	kWh, or kWh equivalent, payment rate equal to \$2,000 for a 20% reduction of energy use per dwelling for the average multifamily building in the State or 50% of project cost

V. APPLICABILITY OF FUEL SWITCHING IN FEDERAL PROGRAMS AND KEEIA PORTFOLIO

HEEHRA program is primarily electrification of the home, including adoption of electric appliances. However, if any overlap exists between HEEHRA and KEEIA programs, it would include Evergy measures that will be “like-for-like” measures to assure no fuel switching. The Order very clearly addresses fuel switching associated with Evergy’s direct ratepayer funded programs by stating that the KCC will only allow utility incentives for appliances that are replacing “like-for-like” in residential and business applications, and that the “Commission urges Evergy to explore the possibility of federal funding for its Business Comfort measures or to collaborate and support other recipients of such federal funding.”¹⁰ First, the IRA Home Energy Rebates are residential based only and therefore pursuit of any federal funding for Evergy’s Business Comfort

¹⁰ Docket No. 22-EKME-254-TAR; Order on Evergy’s Application and Settlement Agreements, p. 25

program is not germane in this update to the KCC. Second, it must be noted that the HEEHRA rebates are limited based on income, whereas the majority of Evergy's programs are not.

VI. ESTIMATED IMPACT OF IRA HOME ENERGY REBATES FOR KANSANS

It is important to assess the estimated impact of the IRA Home Energy Rebates for Kansans relative to the KEEIA programs. Maximizing energy reduction through deep retrofits is ideal for home upgrades, especially for low-income residents. Evergy has performed initial calculations to assess the customer participation impact of the federal funding opportunities. For example, Evergy estimates 8,462 Evergy residential customers (over the 7-year period and less than 1% of Evergy customers) may benefit from the IRA Home Energy Rebates¹¹ and assumes all 8,462 customers receive comprehensive upgrades and the maximum allowable rebate.

Total dollars allocated to Kansas for IRA Home Energy Rebates programs (over the 'up-to' 7-year period):

- HOMES: \$52.7MM; HEEHRA: \$53MM
 - Estimate that 39.9% of the HOMES funding goes to income-qualified.
- Maximum amount of dollar rebate/investment for an individual home:
 - \$22,000 (comprised of max of \$14k HEEHRA & \$8k HOMES) - Income-Qualified
 - \$4,000 (comprised of max \$4k HOMES) - Non-Income-Qualified
- If all Kansas participants receive maximum rebate/investment:
 - 3,365 income-qualified homes in Kansas would receive incentives.
 - 7,918 non-income-qualified homes in Kansas would receive incentives.

¹¹Includes both HOMES and HEEHRA programs.

- Evergy serves approximately 75% of the households in Kansas resulting in:
2,524 Evergy income-qualified homes in Kansas would receive incentives.
- 5,938 Evergy non-income-qualified homes in Kansas would receive incentives.
- 8,462 total Kansas residential customers would receive incentives.

As a point of comparison, Evergy has estimated 240,000 customers will participate in the KEEIA programs over the 4-year period, with about 10% being income-qualified. For those Evergy Kansas residents who cannot achieve the percentage of energy reduction in their home per the IRA guidelines or who do not want to participate in a comprehensive energy efficiency upgrade, the customer may choose to participate solely in Evergy's programs.

VII. OVERVIEW OF WAP AND ADDITIONAL FUNDING SYNERGIES

As stated previously, the Federal DOE weatherization assistance program has been in place for many years and deployed in Kansas by local agencies. Of the \$3.5 billion BIL federal weatherization program funding, \$31.97 million is allocated to Kansas of which at least \$26.3 million is for direct assistance.¹² It is Evergy's understanding that some of these funds have started to flow to Kansans through weatherization agencies. While these funds flow differently than the IRA Home Energy Rebates and are not part of what the SEO will be applying for, they are federally funded and appropriate to take into consideration when comparing to Evergy's KEEIA portfolio. As a relative comparison, 50% of the Hard-to-Reach Homes budget in KEEIA's portfolio is to be allocated to weatherization or about \$4.8 million over 4 years.

¹² [Weatherization Program Notice BIL 22-2 \(energy.gov\)](https://www.energy.gov/sites/default/files/2023-07/WPN-BIL-22-2-v2.pdf) - <https://www.energy.gov/sites/default/files/2023-07/WPN-BIL-22-2-v2.pdf>

Evergy's KEEIA weatherization funding is intended to be a supporting source to the federal program when that program lacks coverage. For example, if higher energy efficient equipment is not covered in the federal program, Evergy may support funding it if it is a cost-effective measure. Or if a customer has been deferred from the federal program due to a pre-existing condition of the home, like roof or structural damage, Evergy's program can make the home "weatherization ready" so it can receive the full federal funding. Evergy has met with a local agency, Kansas Housing Resources Corporation ("KHRC") to discuss additional funding opportunities provided by KEEIA's approval, including blending funds to provide more efficiency for homes and prevent deferrals of homes to participate.

VIII. NEXT STEPS AND RECOMMENDATION REGARDING KCC'S REQUEST AND ANY ORDER MODIFICATIONS

In summary, there are opportunities and challenges still ahead to ensure Kansans receive the best and proper investment in their homes to deploy the KEEIA residential programs with federal funded programs. The opportunity lies in multiplying the ability for Kansans to receive rebates in energy efficiency to achieve deep savings that might not have been economically reachable for certain customers. The challenge is for all the involved actors in Kansas (SEO, Evergy, WAP agencies, market actors, etc.) to be coordinated across many fronts to ensure clear lines for when and how different type of funds can be utilized. Planning and communications to Kansas residents will be key over the deployment period of the federal programs and KEEIA. Much is to be yet determined given that the deadline for the SEO to submit its IRA Home Energy Rebates application is January 2025. There is not a definite timeline for federal approval of applications and deployment timelines. Given this and the above, at this time, Staff, Kansas SEO and Evergy are not recommending any changes or modification to KCC's Order of the conditionally approved KEEIA portfolio.

Evergy looks forward to continued collaboration with the SEO and KCC Staff, along with KHRC, to align on how IRA Home Energy Rebates and KEEIA funding can be used cohesively and provide the best and most comprehensive services to Kansans. These stakeholders will continue to meet and take into consideration requirements of the Contractor Training Grant and weatherization grants. Stakeholders will submit a second report updating the KCC by June 1, 2024, or as directed by the KCC.

Respectfully submitted,

/s/ Cathryn Dinges

Cathryn J. Dinges, #20848
Corporate Counsel
818 South Kansas Avenue
Topeka, Kansas 66612
Telephone: (785) 575-8344
Cathy.Dinges@evergy.com

**ATTORNEY FOR EVERGY KANSAS
METRO, INC., EVERGY KANSAS SOUTH,
INC., AND EVERGY KANSAS CENTRAL,
INC.**

VERIFICATION

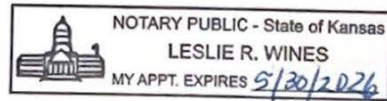
STATE OF KANSAS)
) ss
COUNTY OF SHAWNEE)

The undersigned, Cathryn Dinges, upon oath first duly sworn, states that she is Corporate Counsel for Evergy Metro, Inc., Evergy Kansas South, Inc., and Evergy Kansas Central, Inc., that she has reviewed the foregoing pleading, that she is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of her knowledge and belief.


Cathryn Dinges

Subscribed and sworn to before me this 31st day of October 2023.


Notary Public



My appointment expires: May 30, 2026

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on October 31, 2023, a true and correct copy of the above was electronically served on the following parties of record:

JAMES G. FLAHERTY, ATTORNEY
ANDERSON & BYRD, L.L.P.
216 S HICKORY
PO BOX 17
OTTAWA, KS 66067
jflaherty@andersonbyrd.com

DOUGLAS LAW, ASSOCIATE
GENERAL COUNSEL
BLACK HILLS/KANSAS GAS UTILITY
COMPANY, LLC D/B/A BLACK HILLS
ENERGY
2287 COLLEGE ROAD
COUNCIL BLUFFS, IA 51503
douglas.law@blackhillscorp.com

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

MATT DORITY, DIRECTOR
REGULATORY AFFAIRS
EVERGY METRO, INC D/B/A EVERGY
KANSAS METRO
ONE KANSAS CITY PL 1200 MAIN ST
(64105)
PO BOX 418679
KANSAS CITY , MO 64141-9679
matthew.dority@evergy.com

BRIAN FILE
EVERGY METRO, INC D/B/A EVERGY
KANSAS METRO
One Kansas City Place
1200 Main St., 19th Floor

Kansas City, MO 64105
Brian.File@evergy.com

MARK FOLTZ
EVERGY METRO, INC D/B/A EVERGY
KANSAS METRO
One Kansas City Place
1200 Main St., 19th Floor
Kansas City, MO 64105
Mark.Foltz@evergy.com

DARREN IVES, VP - REGULATORY
AFFAIRS
EVERGY METRO, INC D/B/A EVERGY
KANSAS METRO
One Kansas City Place
1200 Main St., 19th Floor
Kansas City, MO 64105
DARREN.IVES@EVERGY.COM

DARRIN R. IVES, V.P. REGULATORY
AFFAIRS
EVERGY METRO, INC D/B/A EVERGY
KANSAS METRO
One Kansas City Place
1200 Main St., 19th Floor
Kansas City, MO 64105
darrin.ives@evergy.com

TIM NELSON
EVERGY METRO, INC D/B/A EVERGY
KANSAS METRO
One Kansas City Place
1200 Main St., 19th Floor
Kansas City, MO 64105
Tim.Nelson@evergy.com

KIM WINSLOW
EVERGY METRO, INC D/B/A EVERGY
KANSAS METRO
One Kansas City Place
1200 Main St., 19th Floor
Kansas City, MO 64105
Kimberly.Winslow@evergy.com

CONNOR A THOMPSON, ATTORNEY

FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE
1400
OVERLAND PARK, KS 66201-4041
cthompson@foulston.com

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

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

DAVID COHEN, ASSISTANT
GENERAL COUNSEL
KANSAS CORPORATION
COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.cohen@kcc.ks.gov

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

WALKER HENDRIX, LITIGATION
COUNSEL
KANSAS CORPORATION
COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
w.hendrix@kcc.ks.gov

CARLY MASENTHIN, LITIGATION

COUNSEL
KANSAS CORPORATION
COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
c.masenthin@kcc.ks.gov

ROBERT E. VINCENT, MANAGING
ATTORNEY
KANSAS GAS SERVICE, A DIVISION
OF ONE GAS, INC.
7421 W. 129TH STREET
OVERLAND PARK, KS 66213
robert.vincent@onegas.com

LESLIE WINES, ADMINISTRATIVE
ASSISTANT SR.
KCP&L AND WESTAR, EVERGY
COMPANIES D/B/A EVERGY KANSAS
CENTRAL
818 S KANSAS AVENUE
PO BOX 889
TOPEKA, KS 66601-0889
Leslie.Wines@evergy.com

GLENDA CAFER, ATTORNEY
MORRIS LAING EVANS BROCK &
KENNEDY
800 SW JACKSON
SUITE 1310
TOPEKA, KS 66612-1216
GCAFER@MORRISLAING.COM

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

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

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

JUSTIN T. SOMELOFSKE
SIERRA CLUB
50 F Street NW, Eighth Street
Washington, DC 20001
justin.somelofske@sierraclub.org

ROBERT R. TITUS, Attorney at Law
TITUS LAW FIRM, LLC
6600 W. 95th Street
Suite 200
Overland Park, KS 66212
rob@tituslawkc.com

Leslie Kathryn Dinges

**Counsel for Evergy Kansas Metro, Inc., Evergy
Kansas South, Inc., and Evergy Kansas Central,
Inc.**