FILED
November 9, 2026
Missouri Public
Service Commission

Exhibit No. 69

Evergy Missouri Metro – Exhibit 69
Rebuttal Testimony of Ryan Mulvany
Case No. ER-2026-0143

Exhibit No.:	
Issue:	Operations, Distribution, & Transmission Costs; Storm Reserve
Witness:	Ryan Mulvany
Type of Exhibit:	Rebuttal Testimony
Sponsoring Party:	Evergy Missouri Metro
Case No.:	ER-2026-0143
Date Testimony Prepared:	August 11, 2026

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2026-0143

REBUTTAL TESTIMONY

OF

RYAN MULVANY

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri

August 2026

Table of Contents

I. INTRODUCTION 1

II. CAPITAL INVESTMENT & ASSET MANAGEMENT STRATEGY 2

III PLANT-IN-SERVICE REPORTING 9

IV. PLANT RETIREMENTS 10

REBUTTAL TESTIMONY

OF

RYAN MULVANY

Case No. ER-2026-0143

I. INTRODUCTION

Q: Please state your name and business address.

A: My name is Ryan P. Mulvany. My business address is 1200 Main, Kansas City, Missouri 64105.

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

A: I am employed by Evergy Metro, Inc. and serve as Vice President Distribution – Power Delivery Administration for Evergy Metro, Inc. d/b/a as Evergy Missouri Metro ("Evergy Missouri Metro," "EMM," or the "Company"), Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West"), Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("Evergy Kansas Metro"), and Evergy Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas Central ("Evergy Kansas Central") the operating utilities of Evergy, Inc. ("Evergy").

Q: Are you the same Ryan P. Mulvany who previously filed direct testimony in this case?

A: Yes.

Q: Who are you testifying for?

A: I am testifying on behalf of Evergy Missouri Metro.

Q: What is the purpose of your testimony?

A: The purpose of my rebuttal testimony is to respond to recommendations raised by the Wired Group witnesses Paul Alvarez and David Shapley on behalf of the Office of Public

Counsel ("OPC") regarding EMM's substation and distribution investments. Specifically, I explain why EMM's capital investment and asset management strategy should be evaluated based on the Company's unique circumstances and customer needs. I am also addressing Plant in Service Reporting raised by Missouri Public Service Commission Staff witness Trevor Rucker and assertions raised by Staff witness Matthew Young that recent increases in investment can be solely attributed to the implementation of Plant In-Service Accounting ("PISA"). I also address Mr. Young's concerns around plant retirements. Finally, I provide an overview of the witnesses who will address the technical issues raised by the Wired Group in greater detail. These witnesses will demonstrate why EMM's proposed investments are reasonable, prudent, and necessary to provide safe and reliable electric service to our customers.

II. CAPITAL INVESTMENT & ASSET MANAGEMENT STRATEGY

Q: Are you familiar with the Wired Group?

A: Yes. I am familiar with the Wired Group and have reviewed testimony filed by Wired Group witnesses, including Paul Alvarez, in regulatory proceedings involving other electric utilities.

Q: What did you find when reviewing Mr. Alvarez's testimony in other proceedings?

A: I observed that many of the same themes, analytical approaches, and policy positions stated in Mr. Alverez's testimony against EMM have been presented in prior rate cases involving other utilities across the country.

Q: What are some examples of recurring themes and policy positions in the Wired Groups testimony?

A: One example is Mr. Alvarez's repeated assertion that investor-owned utilities are inherently subject to "capital bias" and therefore are incentivized to overinvest in utility infrastructure. Mr. Alvarez states this opinion in his direct testimony against EMM and in testimony filed against Oklahoma Gas & Electric. I also observed a recurring scrutiny of proactive asset replacement programs and distribution system investments. In proceedings involving Indianapolis Power & Light and Oklahoma Gas & Electric, Mr. Alvarez questioned whether utility replacement programs and other distribution system investments would produce reliability benefits sufficient to justify their costs. He raises similar concerns regarding EMM lateral improvement projects and substation asset replacement programs.

Q: What is the conclusion you draw from this?

A: Based on my review, I conclude that many of the recommendations presented in Mr. Alvarez's testimony reflect a broader philosophy regarding utility investment and asset management rather than specific concerns unique to EMM's substation and distribution system, operating environment, or investment decisions.

Q: Do you agree with the recommendations offered by the Wired Group?

A: No. While I appreciate the importance of investigating utility operations and ensuring investments are subject to review, I disagree with many of the recommendations and criticisms presented by the Wired Group's one size fits all approach. As I stated earlier, their testimony reflects general objection toward utility investment, is inconsistent with generally accepted utility asset management practices, and does not give consideration to

the specific operating conditions, asset replacement needs, and customer expectations of Evergy Missouri Metro.

Q: Can broad investment recommendations be applied uniformly across all electric utilities?

A: No. Utility systems are not identical, and investment decisions should be evaluated based on the unique circumstances of the utility and the customers it serves. I disagree with Mr. Alverez's suggestion that utility investment decisions can be viewed primarily through a generalized theory of "capital bias" or an assumption that all utilities inherently favor frivolous capital spending over lower-cost alternatives. While oversight, governance, and prudent reviews are important components of Evergy's investment philosophy, the implication that continued investment in substations or the distribution system is unnecessary unless a utility can first demonstrate historical underinvestment oversimplifies the realities of operating and maintaining a safe and reliable electric grid.

Q: OPC's witnesses Alvarez and Shapley's positions focus heavily on whether an asset has failed a test, inspection, or diagnostic review. Is that an appropriate standard for utility asset management?

A: No. Diagnostic tests and inspections are important inputs into asset management decisions, but they are not the sole determinant of whether an asset should remain in service. Utilities must also evaluate condition trends, age, operating history, maintenance requirements, consequence of failure, spare availability, reliability impacts, safety considerations, and lifecycle costs. A passing test result does not eliminate risk, nor does it establish that replacement would be imprudent. This concept is not unique to utility asset management. For example, a homeowner may decide to replace an aging roof even though it has not yet

developed a leak or collapsed. The decision is based on the age and condition of the roof, its maintenance history, exposure to weather, and the consequences of failure, not solely on whether a leak or collapse has already occurred. Similarly, utilities must evaluate a range of factors when managing aging infrastructure and cannot rely exclusively on whether an asset has failed a test or inspection. Additionally, as EMM witness Andy Alexander explains in his testimony, not every asset has an objective or industry-standard test that can reliably predict future failure. For example, there are currently no structural integrity tests available for overhead conductors. Under Mr. Shapley's approach, the Company would have limited ability to proactively replace aging overhead wire because there would be no objective test failure to justify replacement. In practice, this would mean waiting until conductors fail and customers experience outages before taking action, rather than proactively managing reliability risks through prudent asset replacement programs.

Q: What would be the practical consequence of limiting replacement decisions only to assets that have failed inspections or tests?

A: Such an approach would shift the Company toward a run-to-failure strategy. Waiting until equipment fails or deteriorates to the point that replacement becomes unavoidable increases exposure to outages, emergency repairs, restoration costs, customer interruptions, and safety risks. EMM's objective is to identify and address elevated risks before customers experience the consequences of asset failure.

Q: What factors are currently driving the need for continued investment in EMM's distribution system?

A: Several factors are driving the need for continued investment in EMM's substations and distribution system, including maintaining a safe and reliable electric system, replacing

aging infrastructure, improving resiliency against increasingly severe weather events, and meeting evolving customer expectations. As I discussed in my direct testimony, EMM has historically demonstrated strong performance in restoring customer outages, as reflected by its CAIDI performance, but customers have experienced more frequent interruptions as reflected in its SAIFI performance. EMM's SAIFI trends underscore the importance of continuing to invest in programs that reduce outage frequency, strengthen the grid against major storm impacts, and proactively address aging infrastructure before equipment failure occurs. EMM customers expect reliable service and rapid restoration when outages occur, and continued investment is necessary to maintain and improve performance. EMM's ability to address these challenges and to continue providing the level of service our customers expect is largely dependent on prudent, targeted investments in the distribution system.

Q: Why is it important to proactively address aging infrastructure before equipment failures occur?

A: I hold the view that proactively replacing aging infrastructure as it approaches or exceeds its useful life is an important part of providing safe and reliable power. While inspections and testing are valuable tools for identifying existing equipment issues, they are not the only factors that should be considered when evaluating asset replacement needs. As equipment ages, the risk of failure generally increases, which can lead to safety concerns, customer outages, and more costly emergency replacements. For that reason, prudent asset management includes evaluating a variety of factors, not just whether an asset has failed an inspection or test, to identify and address concerns before they result in a service interruption. I understand that Mr. Shapley places significant weight on inspection and test

failures as drivers for replacement decisions, but I do not agree that utilities should wait for equipment to fail an objective inspection or test before taking action.

Q: Is prudent asset management evaluated with the benefit of hindsight?

A: No. Asset management decisions must be evaluated based on the information available at the time the decision was made. The fact that an asset may continue operating after replacement was considered does not establish that replacement was unnecessary. Utilities manage risk prospectively, not retrospectively.

Q: Do you agree with the Wired Group's suggestions that EMM should broadly reduce or disallow substation and distribution system investments?

A: No, I do not. As discussed above, EMM continues to face important challenges related to maintaining a safe and reliable electrical system. EMM's investments are targeted to address identified safety, reliability, and asset condition needs across the EMM system.

Q: How will EMM address the specific concerns raised by the Wired Group on behalf of OPC throughout the remainder of its rebuttal?

A: EMM will address the specific concerns raised by the Wired Group through testimony from several subject matter experts with responsibility for the areas discussed in their testimony. Andy Alexander will address the impact of equipment caused outages, EMM's asset management strategies, and the methods used to identify and prioritize distribution system investments. Andy Rietcheck will address substation investment planning and explain the factors EMM considers when evaluating substation reliability, asset condition, capacity, and long-term system needs. Jason De Stigter with 1898 & Co.will address EMM's use of AssetLens and the concerns raised regarding the tool, including how AssetLens supports EMM's risk-based asset management and investment planning processes. These witnesses

will also address assertions that EMM's investment decisions are not sufficiently supported by data or analysis. Collectively, these witnesses will demonstrate why EMM's proposed investments are reasonable, prudent, and necessary to maintain a safe, reliable, and resilient electric system for our customers.

Q: Alvarez contends that utilities should follow data driven approaches with measurable value calculations to identify prudent investments. Do you agree with this opinion?

A: Yes, I do agree with this approach and that is exactly why Evergy first began exploring a data driven approach to project identification with 1898 & Co in 2020. That engagement with 1898 ultimately culminated with the development of AssetLens software that Evergy engineers utilize to identify and prioritize potential projects that are worthy of further detailed investigation and project improvements that strengthen the distribution grid and increase reliability performance. In November 2024, Evergy met with Missouri Public Service Commission Staff and provided information regarding AssetLens and its capabilities specifically as part of discussions related to the Company's asset management and investment planning processes. While Alvarez contends that AssetLens is subjective and not data driven this is directly refuted in multiple explanations provided by the Company through discovery in this case and based on our review has been directly countered in repeated reviews of the methodology deployed by 1898 & Co in other regulated electric utility jurisdictions across the country.

Q: Alvarez suggests a variety of factors that are driving a rising need for capital investment and the rate case in general. Are there any driving factors that he fails to mention?

A: Yes, he does not touch on the rate of inflation that has been experienced by EMM and the country as a whole since the last rate case. I present additional information below in response to Young's Plant retirement testimony which details the specific material cost inflation experienced by Evergy. These dramatic cost increases are a major contributing factor to the additional capital requirements for EMM distribution investment.

III PLANT-IN-SERVICE REPORTING

Q: Have you reviewed Staff Witness Rucker's Direct Testimony filed in this docket?

A: Yes, I have reviewed Mr. Rucker's testimony.

Q: Do you agree with Mr. Rucker's recommendation to the Commission that EMM's Plant-In-Service Accounting reporting requirements be modified to provide project documentation for all projects over $1 million in cost?

A: I do not. Requiring EMM to provide documentation for projects that cost more than $1 million outside of a formal rate review is unduly burdensome and onerous. EMM recognizes that we must make prudent investment decisions on behalf of customers. EMM also realizes we must work with Staff to ensure we provide evidence of prudency. However, increasing the amount of regular reporting outside of rate proceedings only increases regulatory burden and cost without providing any benefit to customers.

Q: Did Mr. Rucker submit data requests for project information in this rate case?

A: Yes, Mr. Rucker requested project information in Staff Data Request Nos. 377 and 378 for all EMM projects over $1M in cost in this rate proceeding.

Q: What were Mr. Rucker's conclusions based on this data?

A: After submitting all of the requested supporting material, Mr. Rucker stated concerns on $23,953.27 of EMM investment.

Q: What conclusions do you draw from Mr. Rucker's above concerns?

A: I conclude that the overwhelming majority of EMM investment, as reviewed by Staff, is deemed prudent and should be included for rate recovery. Further, the relatively narrow scope of concern raised by Mr. Rucker does not justify the onerous undue regulatory reporting burden Mr. Rucker recommends the Commission order on EMM.

Q: Do you have recommendations for Staff?

A: Yes, generally accepted audit principles utilize the concept of sampling data sets. Following this procedure would allow Staff to sample a small quantity of large projects over $1 million in cost included in rate recovery proceedings. This would allow Staff to analyze prudency on the selected projects. If concerns arise, more samples could be requested. This method would save Staff and EMM undue effort while demonstrating sound audit practices and ensuring prudency.

IV. PLANT RETIREMENTS

Q: Are you familiar with the analysis performed by Staff witness Young regarding Evergy Missouri Metro's investment levels?

A: Yes. Staff witness Young compared EMM's transmission, distribution, general, and intangible plant balances during the period preceding PISA with plant balances following implementation of PISA. Using that comparison, Mr. Young concluded that if plant had continued growing at approximately the same pace experienced before PISA, total plant balances at December 31, 2025, would have been approximately $1.5 billion lower than

actual levels. Based on that comparison, he attributes much of the increase in investment to PISA.

Q: Do you agree that the difference between pre-PISA and post-PISA plant balances can simply be attributed to PISA?

A: No. The analysis is much too simplistic to support that conclusion. Staff's comparison assumes that the primary difference between the pre-PISA period and post-PISA period was the existence of PISA. The reality is that many other factors changed during that same period, including labor costs, material costs, equipment availability, reliability requirements, resiliency needs, aging infrastructure conditions, and customer expectations regarding electric service reliability. As a result, the mere fact that investment levels increased after PISA does not establish that PISA caused the entire increase. Using Mr. Young's rationale system investment levels from 1985 could also be a good predictor of needed 2025 system investment levels. While a preposterous analogy, it is useful to highlight how oversimplified Mr. Young's approach to evaluate appropriate system investment levels is.

Q: Has inflation affected the cost of providing electric service and investing in the T&D system?

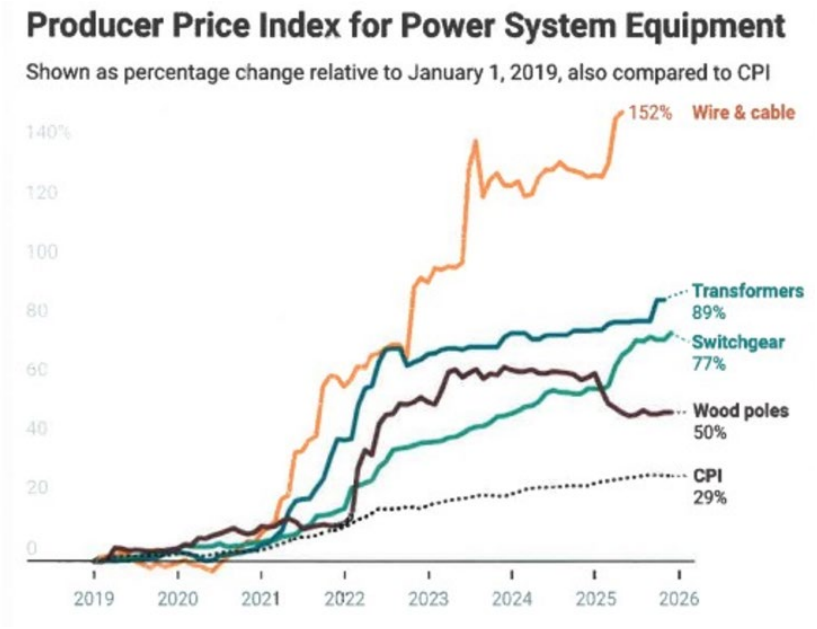
A: Yes, inflation was a huge driver in the increase in capital investment over the last several years. This is an important topic to address because several witnesses point to increased capital investments without fully accounting for the significant increase in costs of providing electric service. The Wired Group witnesses Paul Alvarez and David Shapley attribute much of EMM's increased capital investment to frivolous capital spending practices, and discretionary investment decisions, while Staff witness Matthew Young cites

PISA as a contributing factor. However, any evaluation of changes in investment levels must also consider the significant inflationary pressure that utilities have faced in recent years. The costs of labor, transformers, poles, wire, cable, and other equipment necessary to operate and maintain the distribution system have increased substantially. As a result, much of the increase in capital spending simply reflects the higher cost of providing safe and reliable power today compared to several years ago, rather than a fundamental change in the Company's investment philosophy or practices.

Q: How has inflation impacted EMM's investment strategy?

A: The electric utility industry has experienced significant inflationary pressure in recent years, resulting in substantially higher costs for many of the materials and equipment necessary to provide safe and reliable electric service. As illustrated in the Figure 1, industry-wide costs for key distribution system components have increased at a rate far exceeding general inflation, with wire and cable, transformers, switchgear, and wood poles all experiencing significant price escalation relative to the consumer price index (CPI). These increased costs have required EMM to allocate a larger portion of its capital budget to essential infrastructure investments to maintain existing levels of reliability and service. As a result, inflation has not reduced the need for investment in the electric grid; it has increased the cost of making those investments.

FIGURE 1



Source: BLS, FRED, & Lawrence Berkeley National Laboratory

Q: Did witness Young separate the effect of inflation from the effect of increased investment activity?

A: No, not at all. Mr. Young's analysis was too simplistic when looking at capital spend over a long period of time. Staff's analysis measures nominal dollars invested. It does not determine how much of the increase resulted from additional infrastructure projects and how much resulted from inflationary increases in material, labor, and construction costs. Further, the intent of the state Legislature's adoption of PISA was to address infrastructure needs and encourage continued investment in critical electric infrastructure. Accordingly, some increase in infrastructure investment following the enactment of PISA is neither surprising nor inappropriate. The flaw in Mr. Young's analysis is not that he recognizes PISA may have contributed to investment growth, but that he is attributing the entirety of EMM's increased investment levels to PISA without considering the many other factors that influenced investment decision during the same period, including inflation, aging

infrastructure, reliability and resiliency needs, equipment availability, and customer expectations.

Q: Following witness Young's analytic approach, how much of the capital investment increase since 2018 is attributable to inflation.

A: All of it. Witness Young's analysis used the nominal pre-PISA growth rate for transmission plant to estimate 2025 capital investment levels. He then compared that estimation to actual 2025 investment levels to support his conclusion. Instead, if the Handy Whitman Index for transmission and distribution plant for Evergy's geographic region were used, the result shows that the estimated 2025 investment level is above Evergy's actual 2025 capital investment. Said another way, inflation alone explains the entire increase in investment levels. Accordingly, witness Young's conclusion that approximately $1.5 billion of additional investment was caused entirely by PISA is inaccurate.

Q: Inflation aside, is there a further fundamental problem with witness Young's analysis that renders his conclusions entirely unreliable?

A: Yes. As I just explained, upon review of Young's analysis, inflation can explain the entire growth in investment levels. However, even more fundamental to witness Young's analysis, is that he chose to apply the transmission plant pre-PISA capital growth to distribution plant and general and intangible plant. The pre-PISA transmission plant capital growth rate is lower than the capital growth rate over that same period for distribution plant and general and intangible plant. Since witness Young uses this lower growth rate to estimate 2025 investment levels, his analysis significantly understates the estimations for distribution plant and general and intangible plant. He then compares these understated

estimations to actual 2025 investment levels which inflates the difference that he then reports as attributable to PISA. This analytic choice is entirely inappropriate and cherry-picks a data point to support an incorrect conclusion. Had witness Young used his own internal analytic results of pre-PISA growth rates for each functional investment area, his analysis would have shown that extrapolated capital investments were nearly $600 million *below* Evergy's actual 2025 levels; which is the complete opposite of his conclusion.

Q: What do you conclude from your review of witness Young's analytic attempt to conclude that $1.5 billion of increased investment is attributable to PISA?

A: The analysis is incorrect and entirely unreliable. Witness Young presents this analysis as a means to support Staff's assertion that PISA is driving early retirements. As I explain in my testimony, there are a number of real-world factors driving increased investment levels and witness Young's analysis does not account for these actual drivers of investment growth in any way.

Q: When evaluating the level of investment made during the period analyzed by witness Young, what conditions existed on the Company's system?

A: The Company was managing a system with a significant amount of aging infrastructure. As discussed in my direct testimony, many major classes of distribution assets were approaching, meeting, or exceeding expected life characteristics during the period witness Young examines.

Q: Why is that information important when evaluating witness Young's conclusions?

A: Because witness Young's analysis effectively assumes that increased replacement activity was driven primarily by PISA. However, the Company was already facing substantial asset replacement demands associated with aging infrastructure. The existence of those aging

assets provides a clear independent reason why investment levels would be expected to increase over time, regardless of whether PISA existed.

Q: What challenges does an aging distribution system create?

A: As assets age, utilities face increasing risks associated with reliability, outage frequency, equipment failure, emergency replacement, employee safety, and customer service. In my direct testimony I explained that the Company faces continuing challenges associated with aging infrastructure, reliability performance, severe weather resilience, and customer expectations regarding service quality. Those challenges require ongoing investment regardless of the existence of PISA.

Q: Witness Young suggests that replacement of assets before average life demonstrates excessive investment encouraged by PISA. From an operational perspective, is replacement before average life unusual?

A: No. Utilities do not operate their systems by waiting for every asset to reach its theoretical average accounting life before replacement. As discussed earlier in my testimony, replacement decisions are based upon many operational considerations including condition, reliability risk, recurring outages, capacity limitations, safety concerns, resiliency requirements, technological obsolescence, and system configuration needs.

Q: Can an asset be prudently replaced before its average accounting life?

A: Absolutely. In fact, many prudent utility replacements occur before average accounting life. The concept of an average life is a depreciation concept. It is not an operating requirement. A utility's obligation is to provide safe and reliable service. That sometimes requires replacement before average life and sometimes results in assets remaining in service well beyond average life.

Q: **Can you provide an example of why an asset might be retired or replaced before the end of its useful life**?

A: Yes. A simple example would be a vehicle striking and severely damaging a distribution pole. In that situation, the Company would replace the pole regardless of whether it has been in service for five years or fifty years. The decision would not be driven by the pole's depreciation life, age, or expected useful life. Instead, it would be driven by Evergy's obligation to provide safe and reliable power and to protect public safety.

Q: Have you reviewed the assets that witness Young alleges were retired early based on his analysis of Staff Data Request No. 0191?

A: I reviewed the top 7 retired asset units that comprise 30% of the total amount that witness Young concludes were "early retirements."

Q: Do you agree with Staff's characterization of these projects as early retirements improperly induced by PISA?

A: No. As I mentioned earlier, many factors can drive the replacement of infrastructure before the end of an asset group's average group useful life. The examples from Staff Data Request No. 191 identify several projects and the associated investment amounts that illustrate these operational drivers. Additional details regarding the specific circumstances of each project are provided by the applicable sponsoring witnesses in their testimony. Representative examples are provided below, along with the associated investment amounts and sponsoring witnesses.

- **Issue:** Boiler superheater sections were retired due to recurring material failures (Iatan Unit 2, La Cygne Unit 2, and Hawthorn Unit 5). **Value:** ~$10 million (EMM allocated portion)**. Witness:** Hollinsworth.

- **Issue:** Equipment condition no longer supported safe and reliable operation (Hawthorn Units 5 & 6). **Value:** ~$3 million (EMM allocated portion). **Witness:** Hollinsworth.

Q: Do other Company witnesses discuss some of the failings of Staff witness Youngs analysis?

A: Yes. Company witnesses Ronald Klote and John Spanos discuss some of the failings in witness Young's analysis. In fact, Company witness Klote discusses the fact that 16% (EMM allocated rate base of $7 million of the $43.9 million) of the rate base difference that Staff witness Young attributes to PISA was simply a wrong depreciation rate that was used in the analysis. Couple that error with the $13.0 million (EMM allocated portion), or 30%, in projects discussed above that retirement activities were necessary for specific reasons you get almost half of the delta explained that was identified in Staff witness Young's testimony.

Q: What conclusions should the Commission draw from your review of the projects relied upon by witness Young?

A: The Commission should conclude that witness Young's analysis is flawed, entirely too simplistic and does not establish the causal relationship necessary to support his proposed rate base adjustment. Witness Young examines retirement accounting records and infers that increased investment following PISA resulted in excessive early retirements. However, when the underlying projects are examined individually, a very different picture emerges. The replacement decisions were driven by a variety of legitimate operational considerations.

The examples I discussed are not isolated exceptions. Rather, they are representative of the types of considerations that routinely drive utility investment decisions. In each case, there were specific operational circumstances supporting the replacement decision that cannot be determined simply by reviewing plant accounting records or comparing retirement dates to average service lives. As a result, there is no basis to conclude that the retirement activity identified by Staff was caused by PISA or that the investments supporting those retirements were unreasonable.

Q: Does that conclude your testimony?

A: Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Request for Authority to Implement A General Rate Increase for Electric Service	))))	Case No. ER-2026-0143

AFFIDAVIT OF RYAN P. MULVANY

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Ryan P. Mulvany, being first duly sworn on his oath, states:

1. My name is Ryan P. Mulvany. I work in Kansas City, Missouri, and I am employed by Evergy Metro, Inc. as Vice President Distribution – Power Delivery Administration.

2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Evergy Missouri Metro consisting of nineteen (19) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

Ryan P. Mulvany

Subscribed and sworn before me this 11th day of August 2026.

Notary Public

My commission expires: April 26, 2029

ANTHONY R WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2029
PLATTE COUNTY
COMMISSION #17279952