

Information regarding contemporaneous disclosures as required by the FERC Standards of Conduct Transparency rule in Section 358.7 (a)(1) and (2).

Information posted on behalf of all Evergy electric utility operating entities.

Last updated: June 26, 2025

Date of Disclosure	Information Disclosed
June 2025	In April 2025, Evergy discovered files containing non-public transmission information were inadvertently placed on a network drive that could be accessed by Evergy's Marketing Function Employees (MFEs). The specific information was input and output files from the Southwest Power Pool (SPP) utilized for long-term planning. SPP does not provide this information to people responsible for power marketing functions. Upon discovery, the files were moved to a separate folder that MFEs could not access. The non-public transmission information was moved to this folder at the end of 2024 or early 2025. It was during this time that Evergy was undertaking an effort to move data from individual and shared network drives to other repositories such as SharePoint sites. Prior to this, certain quantitative analysts at Evergy – not designated as MFEs – had access to this information and stored it on individual network drives that could not be accessed by MFEs. Additionally, at the end of December, a quantitative analyst resigned and departed Evergy. As part of the corporate initiative to move files from network drives, that person's files were moved to temporary repositories with the assistance of Evergy's Information Technology department. The improper access was discovered by a quantitative analyst reviewing various files from the former employee as well as reviewing information for data retention policies. The analyst notified their manager about the situation (who is designated as an MFE at Evergy) who in turn immediately notified Evergy's FERC Compliance group. It was confirmed that the information contained in the input and output files is not easily understood or to decipher without the appropriate schema or programming language. MFEs that handle day-to-day power trading at Evergy do not have this schema or programming language. Although Evergy does not believe that an MFE accessed the information or had the tools to understand and decipher the modeling information, Evergy is posting this disclosure out of an abundance of caution.
February 2025	In early November 2024, Evergy discovered that a Marketing Function Employee (MFE) inadvertently had been receiving accounting spreadsheets that included Evergy information provided to the MFE as a transmission customer but also included unaffiliated third-party transmission customer data. The spreadsheets contained Southwest Power Pool (SPP) transmission settlement invoice details and were provided to the MFE for monthly and annual transmission budgeting purposes. Spreadsheets were divided to include Evergy data as the transmission customer and a separate tab with information for unaffiliated transmission customers/operators. Evergy considers the information non-public transmission information until it is made publicly available by SPP or within a FERC filing. In an interview with FERC Compliance, the MFE stated they were not aware of the additional tab on the spreadsheets or that they had access to the unaffiliated transmission customer data. They explained the spreadsheets were utilized only to gather required information to complete transmission budgeting tasks. Additionally, the MFE provided screenshots showing that all spreadsheets had been deleted from their electronic storage repository.

	An internal review determined that beginning in May 2022 spreadsheets with the unaffiliated transmission customer information was shared with an MFE. Changes in SPP's processes, Evergy employee changes, and changes in Evergy's processes were some of the factors that caused the inadvertent information sharing. Evergy's FERC Compliance group conducted interviews with Evergy's Energy Accounting group and Transmission Settlements group to identify immediate actions to implement and any recommendations for future actions to help prevent a similar reoccurrence.
September 2024	September 12, 2024, a Marketing Function Employee (MFE) inadvertently received an email that contained nonpublic transmission information that was sent from an Evergy wind technician working foreman. The MFE immediately notified Evergy's FERC Compliance group about receiving the email and stated they deleted the email and removed it from their deleted email folder. The original email was sent from an Evergy employee in the transmission operations planning group to the wind technician working foremen as well as employees in outage, operations, and maintenance groups. No MFEs were included. The wind technician working foreman then forwarded the email to their management team and also included an MFE on the cc line. The specific information from the email is provided below. FERC Compliance communicated with the wind tech foreman and their leadership reminding them of Standards of Conduct requirements. Additional communications are planned with the specific employee to prevent a future inadvertent disclosure. <u>From the original email:</u> Subject: Spearville Substation Outages We are doing trip coil and lockout testing on Spearville TX1 and TX2 as well as the breakers. During these outages, the TSO (transmission system operations) will call (a specific Evergy metering services group employee) to ensure the meters are interrogated. The current dates for these outages is as follows: Spearville Whole Sub – 9/18/24 08:00 – 9/23/24 16:00 (All wind generation needs to be offline) Limits: Evergy 288, Evergy Feeder breakers, Sunflower 6029A, and Sunflower 6030B Spearville TX1 and Switchgear 1 – 9/24/24 08:00 – 16:00 (only needed if not done during the whole sub outage) Limits: Evergy R61, Evergy Switchgear 1 feeder breakers Spearville TX2 and Switchgear 2 – 9/25/24 08:00 – 16:00 (only needed if not done during the whole sub outage) Limits: Evergy R62, Evergy Switchgear 2 feeder breakers
August 2024	On August 28, 2024, a Marketing Function Employee (MFE) received an email from an Evergy wind technician working foreman that contained nonpublic transmission information. The MFE immediately responded to the sender requesting removal from the correspondence and reminding the sender of their MFE designation. Additionally, the MFE deleted the email and removed it from their deleted email folder. The original email was an automated internal communication triggered by the outage coordination system. It was about a switching request from the Evergy substation group and was distributed to transmission and distribution maintenance employees, the wind technician working foreman, and to Evergy's Generation System Operators. The latter are not designated as MFEs. The wind technician forwarded the email to their management and included the MFE on the cc line. The specific information from the email is provided below. Evergy's FERC Compliance confirmed that the outage request had not been entered into the Southwest Power Pool's (SPP) CROW outage system as of the time the email was received and was not publicly available. SPP requires this information to be entered no less than two weeks prior to the request start date. The request could be rescheduled prior to its final submission by Evergy or its approval by SPP. Once work starts, it will impact generation output from Spearville I, II, and III.

	FERC Compliance communicated with the wind tech foreman and their leadership reminding them of Standards of Conduct requirements and referencing tools to help prevent a future inadvertent disclosure. Work Type: Switching Substation(s): Spearville Wind (716) Work To Be Performed: Replace Line 1 RFL relay to 411L Equipment Requested: Spearville Line 1 to EDF New Start Time: 09/18/2024 08:00 New End Time: 09/25/2024 16:00 Previous Start Time: 09/23/2024 06:00 Previous End Time: 09/25/2024 15:00
June 2024	On June 5, 2024, an email containing non-public transmission information was forwarded from a site manager at a power plant (not a Transmission Function nor a Marketing Function employee) to an Evergy Marketing Function Employee. The MFE did not respond to the email and instead immediately notified FERC Compliance of the email. The MFE deleted the email. Site managers contact MFEs regarding resource capacity impacts. However, in this case, the site manager inadvertently included non-public transmission information. The email discussed a reduction in power to occur over a two-day period in the coming weeks from the power plant due to plans for work on a specific transmission line. The information in question can now be found under CROW (467990). The employee that inadvertently sent the e-mail with the non-public transmission information, as well as other employees included in the email communication, were reminded of the Standards of Conduct and the No-Conduit rule.
February 2023	In February 2023, Evergy discovered that a Marketing Function Employee (MFE) had access to a database schema that included nonpublic transmission information. The MFE involved in this matter is a quantitative analyst that provides data and support to Evergy MFEs with day-to-day marketing functions. At Evergy, this role is designated as an MFE. Access to the schema was immediately terminated once it was discovered. Access was granted to the MFE while developing a schema for an automated Power BI dashboard. Evergy's Operations & Analytics group (O&A group) sought assistance from the MFE to provide commodity pricing data. In order for the O&A group to include the data, the MFE needed certain access to the dashboard to write that data to an Oracle SQL. While collaborating with the MFE, the O&A group discovered the MFE had inadvertently been provided read access to the entirety of the database schema instead of only being granted write access to a specific table within the schema. Evergy's FERC Compliance group reviewed sample data available in the database and determined that although it was mostly distribution-focused line data, there also was real-time transmission breaker information. It also was confirmed that access was initially granted January 25, 2023, and was revoked on February 3, 2023. No other MFE had access. In an interview with FERC Compliance, the MFE stated they were not aware of the read access to the entirety of the database. Additionally, the MFE provided a written statement confirming they had not perused, queried, or extracted any other datasets and only focused on attempting to write a small dataset to a specific table.
August 2022	Picture images showing one-line drawings and information from an Evergy transmission operations center were stored in a common corporate repository known as Brand Central. All Evergy employees, including Marketing Function Employees (MFEs), have access to the Brand Central repository, which mostly includes imagery approved by Evergy's Corporate Communications department. The images that contained nonpublic transmission information were improperly included in this repository. In most cases, images were of a limited view and often pixelated or blurred to some degree. Additionally, Corporate Communications confirmed the images were of historical information and not captured within the last couple years. Because the images were of a limited view and of historical information, Evergy believes there was no potential market impact. However, Evergy still considers the information contained in the images nonpublic transmission information and protected Critical Energy/Electric Infrastructure Information.

	August 4, 2022, Evergy's FERC Compliance department completed a preliminary review of images in Brand Central and identified images for removal. Corporate Communications confirmed on August 12, 2022, that the identified images had been removed and no longer accessible to all employees. Further, access reports from the repository indicate that although Evergy MFEs did log in to Brand Central, they did not access any of the transmission-related images. Reports show MFEs generally accessed corporate-approved letterhead, presentations, and either generic or company-specific images of employees, power plants, distribution lines, and transmission lines.
September 2021	Evergy's Risk Management (Risk) group reviewed access for an electronic folder managed by the Risk group located on the Evergy network drive where non-public transmission information was stored and discovered Evergy marketing function employees (MFEs) inadvertently could access the folder. Information stored on the network drive folder included customer credit exposure reports, and monthly and quarterly non-public transmission owner reports utilized for FERC Form 1 preparation and reporting requirements. Evergy considers the information non-public transmission information until it is publicly available in submitted Form 1s or other FERC documents. Upon discovery on September 7, 2021, Risk immediately notified Evergy's FERC Compliance group. On September 8, 2021, it was confirmed access to the network drive was removed for MFEs. New network drive folders have since been created with separated access. Evergy is determining how and when access to the network drive was granted to MFEs. FERC Compliance confirmed that the monthly and quarterly non-public transmission information reports were included in this folder beginning in January of 2021 as a result of an internal report consolidation project. There were several years of historical customer credit exposure reports in the folder. Risk and specific Information Technology employees were reminded of the Standards of Conduct, the No-Conduit rule, and the importance of access verifications.
August 2021	On August 26, 2021, a customer credit exposure report was sent via e-mail by a Risk Management employee to two Front Office marketing function employees (MFE). The report was sent as an example of a potential report that can be generated from Evergy's trade deal capture system. After it was sent, it was discovered that the report also included information for transmission customers. Although the report only displays dollars by transmission customer, Evergy considers the information non-public transmission information. There are no details on volumes or rates in the report. The email containing the report was successfully recalled from one MFE. However, the second MFE opened the email and forwarded it to a third MFE prior to the recall request. The two MFEs were instructed to not save or forward the file to anyone else and were directed to permanently delete it from their inbox and deleted folders. The Risk Management employee that inadvertently sent the e-mail with the report attached as well as all employees in that department were reminded of the Standards of Conduct and the No-Conduit rule.
August 2021	During a review of user access to Evergy's common datahub platform, Evergy's Risk Management group discovered that a marketing function employee (MFE) had access to, among other things, specific non-public transmission information. Evergy's FERC Compliance confirmed that the MFE was added to an active directory group on June 25, 2021, which granted access. It was removed August 16, 2021, immediately upon discovery. Evergy's datahub serves as a repository for company data from a variety of sources. Some of the datahub information is publicly available data, including transmission information available from the Southwest Power Pool's website or OASIS site. In this case, access to information from Evergy's energy trade deal capture system had been granted to the MFE. The non-public information that could have been accessed included historical counterparty names, volume, pricing, and general transmission customer billing information. No current-day information was available. Through an internal review completed by Evergy's FERC Compliance group, it was verified that access had been removed and that the MFE was not aware they had access and the MFE had not received or downloaded any of the non-public transmission information.

	The Risk Management group has implemented workflows and weekly access reviews for the energy trade deal capture system information that is available in the common datahub platform to help prevent a future potential inadvertent disclosure.
May 2021	May 7, 2021, an email containing non-public transmission information was sent from a shift engineer at a power plant (not a Transmission Function nor a Marketing Function employee) to an Evergy Marketing Function Employee. The MFE did not respond to the email and instead immediately notified FERC Compliance of the email. The MFE deleted the email. Plant staff contact MFEs regarding plant outages. However, in this case, the shift engineer inadvertently included brief non-public transmission information. The email discussed a reduction in power this fall from the power plant because of plans for work on a specific transmission line. The email did not contain specific dates or other details. For those reasons, Evergy believes that there was no potential market impact.
April 2021	A picture image showing a one-line drawing from the transmission operations center was featured as a background image in Evergy's Code of Conduct online training course that was assigned to employees during the first quarter of 2021. An additional image appeared in an Intranet story that was posted internally on April 29, 2021. It was determined the images are from 2019. However, Evergy considers the information contained in the images non-public transmission information. Evergy's Marketing Function Employees were required to complete the Code of Conduct course and would have been able to view the image. Additionally, Evergy's MFEs are able to access stories on the Intranet and could have viewed the Intranet story and image. Because both images were of a limited view and of historical information, Evergy believes there was no potential market impact. The images were replaced with other stock images.
January 2021	Non-public transmission points of value potentially could have been accessed by Evergy's Marketing Function Employees (MFEs) as a result of transitioning from one IT server to another. Evergy's process had been to store specific generation-only information in a Pi system server separate from non-public transmission information. Because Evergy recently moved to a different Energy Management System, the generation data was moved to a new Pi server that Evergy's Generation Information Technology (IT) group manages on a day-to-day basis. The new server was fully implemented around January 12, 2021. Shortly thereafter, a review of point values took place to confirm the accuracy of information transferred from the old server to the new server. It was during the review that Evergy's Manager of Generation System Operations (not an MFE) discovered the transmission points that were inadvertently included. Evergy considers these points non-public transmission information. Upon discovery, information about the points was immediately discontinued from being placed on the server and transmission information was removed. Although the server had been implemented, as of around January 20, only one MFE had been notified of the server's existence. The MFE states they had not attempted to access it. None of Evergy's other MFEs had been notified or otherwise made aware of the server name or that it could be accessed. Further, the Manager of Generation System Operations reviewed access logs and confirmed no MFEs viewed the data on the server. Evergy's IT group is reviewing processes to prevent a similar reoccurrence. Evergy's FERC Compliance group will verify that review and assure measures to prevent are implemented.