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Filed Date: 08/26/2025
State Corporation Commission
of Kansas

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Triennial Compliance Docket for the Integrated Resource Plan of Evergy Kansas Central, Inc. & Evergy Kansas Metro, Inc. Pursuant to the Commission's Order in Docket No. 19-KCPE-096-CPL	)))))	Docket No. 24-EKCE-387-CPL

EVERGY RESPONSE TO STAKEHOLDER COMMENTS

COMES NOW, Evergy Kansas Central, Inc. ("EKC") and Evergy Metro, Inc. ("EKM") (collectively referenced hereinafter as "Evergy"), hereby submit to the Kansas Corporation Commission ("Commission") this Response to comments submitted by Commission Staff ("KCC Staff"), Council for New Energy Economics ("NEE"), Sierra Club, and Kansas Electric Power Cooperative, Inc. ("KEPCo") regarding Evergy's 2025 Integrated Resource Plan Annual Update ("2025 Annual Update").

BACKGROUND

On May 1, 2025, Evergy filed its 2025 Annual Update in this docket. A stakeholder presentation took place on May 19, 2025, and pursuant to the Commission's Order granting an extension of time to file comments,[1] stakeholder comments were submitted on July 2, 2025.

Comments were submitted by Citizens' Utility Ratepayer Board ("CURB"), KCC Staff, KEPCo, NEE, and Sierra Club. CURB's comments affirm its position that the 2025 Annual Update complies with the IRP framework set out in the 19-096 Docket.[2]

[1] Order Granting Staff's Motion for Extension to File Integrated Resource Plan Comments by July 2, 2025, dated June 5, 2025.
[2] Comments of the Citizens' Utility Ratepayer Board Regarding the 2025 Annual Update Integrated Resource Plan Filing, dated July 2, 2025, at 3.

EVERGY RESPONSE TO COMMENTS BY KCC STAFF

1. **Staff conclusion and recommendation related to retirement alternatives:** The evaluations underpinning the selections of the respective Preferred Portfolios for EKC and EKM are incomplete in that they do not include a comprehensive assessment of potential alternatives for resource retirement dates and/or fuel conversion.

Response: Evergy will evaluate alternatives including options to postpone planned retirement dates and/or convert coal resources to natural gas operation in the next IRP.

2. **Staff conclusion and recommendation regarding updates to fuel forecasts, construction cost uncertainty:** A more comprehensive assessment is required in advance of any definitive commitments for resource retirements or applications to build or acquire new thermal resources.

Response: Evergy will conduct a stakeholder meeting prior to the 2026 Annual Update to discuss critical factors and assumptions, as agreed to in the partial settlement regarding new natural gas resources and directed by the Commission in its recent order.[3]

3. **Staff conclusion and recommendation regarding large load additions:** No resource commitments should be made to meet anticipated large loads in the absence of an executed service agreement under a Commission-approved large load tariff.

Response: As agreed in the partial settlement and directed by the Commission, Evergy will not incorporate a new large load into the preferred resource plan or begin to procure any energy or capacity until the earlier of an approved SPP study or a final or near-final service agreement with the customer.[4]

[3] Order Approving Unanimous Partial Settlement Agreement Regarding Solar Facility and Non-Unanimous Partial Settlement Agreement Regarding Natural Gas Facilities, 25-EKCE-207-PRE at 10.
[4] Id.

EVERGY RESPONSE TO COMMENTS BY KEPCO

KEPCO Comment 1: The 2025 IRP fails to test alternatives to retiring Jeffrey Unit 3 despite changed market conditions that have caused Evergy to develop retirement alternatives for other previously planned retirements.

Response: Evergy will evaluate alternatives to retiring Jeffrey Unit 3 in the 2026 Annual Update.

EVERGY RESPONSE TO COMMENTS BY NEE

NEE Comment 1: Evergy should update the approach to capital cost scenario weighting to reflect the higher likelihood of base and high scenarios.

Response: Evergy has observed a volatile and increasing cost environment over the past few years. There have been varying opinions as to whether inflation, which seemed to be driven by the global pandemic, Ukraine war and other supply chain issues, would subside. Natural gas and other commodity prices have fallen over the last couple of years from highs during these times, however construction and materials costs forecasts have continued to rise. Recent announcements of large load demand have likely contributed to the sharp increase in cost and lead times for new natural-gas-fired resources. Evergy has updated base cost assumptions for these resources in the IRP consistent with development experience. With this higher baseline, it is unclear whether the future forecast risk should be biased to higher probabilities of cost increases. Evergy believes that the IRP assumptions are a reasonable risk assessment but can continue to work with stakeholders and assess market conditions to determine whether probabilities should be skewed towards higher inflation risk.

NEE Comment 2: Evergy should provide clarity around its approach to new wind build assumptions and consider a broader use of submitted bids to include lower capacity factor and include all COD submissions.

Response: Evergy does not agree this is a deficiency. Evergy used pricing for available new build resources from its most recent 2023 All-Source Request for Proposal ("RFP") when developing the wind cost assumptions used in the 2025 annual update to the IRP. These prices were reflective of the capital costs required to build the resources. The IRP does factor in ongoing operations and maintenance costs for the resources, but the new-build table is only reflective of the capital needs for construction.

NEE Comment 3: Evergy should utilize RFP bids to derive paired solar and storage resources options that will likely create lower cost portfolios.

Response: Evergy will evaluate offers from the All-Source RFP issued in May 2025 as well as updated market intelligence from development projects to update the available resources options and expected costs for its 2026 Annual Updates.

NEE Comment 4: Evergy should update natural gas price forecasts and raise the risk weighting of high-case gas price scenarios.

Response: Evergy used the most up-to-date natural gas price data at the time of preparing and filing the 2025 IRPs and will continue to do so in subsequent IRPs. There is no reason to update or make changes to the natural gas price forecasts used in the 2025 IRP. Additionally, Evergy's current risk weighting of natural gas prices across the low, mid, and high levels is informed by historical prices and future expected prices and the Company does not agree that the IRP should raise the risk weighting of high-case gas price scenarios.

NEE Comment 5: Evergy should model a wider variety of ownership structures when considering new thermal plants.

Response: Evergy does not agree this is a deficiency. Evergy considers reasonable outcomes of shared ownership, reflective at a 50% ownership level or full ownership at a 100% level. Evergy must be compliant with the resource adequacy rules of the Southwest Power Pool ("SPP") and the Commission has recently acknowledged Evergy's plan to own and build new capacity. Modeling different ownership structures only pushes Evergy to solve to zero excess capacity under the resource adequacy rules. This situation presents undue risk to customers as minor changes in SPP accreditation methodology could have Evergy utilities dip below their supply side obligations.

NEE Comment 6: Evergy's IRP should address fair adjustment clause cost allocation that considers which customers' new loads may be causing increased fuel costs.

Response: Evergy's IRP process includes full capital, operating, and fuel cost estimates to meet full retail load. It does not attempt to allocate any of these costs to specific customers. Generally, this is handled via the established rate case process. Additionally, there is an active docket for Evergy's proposed new Large Load Power Service ("LLPS") tariff portfolio offerings that is the better arena to discuss fuel cost causation and fair cost allocation.

NEE Comment 7: The Commission and Evergy should clarify interconnection requirements whether the outlined Transmission Protection Requirements apply to large loads and which other specific studies are required for large loads, such as whether harmonic distortion, voltage flicker, power factor, voltage fluctuation, and ferroresonance risk assessment are formally required for large load interconnection requests, and make modeling requirements explicit including specifying required types of modeling data.

Response: The Company follows all SPP and NERC requirements to ensure continued reliability of the transmission system following the interconnection of large loads. The Company's requirements are contained in the Facility Interconnection Requirements posted publicly on Evergy's OASIS site.

EVERGY RESPONSE TO COMMENTS BY SIERRA CLUB

Sierra Club Comment 1: The IRP fails to consider the early retirement of Jeffrey 1 despite the unit's abysmal performance, most notably its lack of reliability.

Response: In the 2025 IRP, EKC took a balanced approach in planning, recognizing that the Jeffrey resources are aging and have experienced prolonged outages in the past few years. EKC's 2025 IRP Preferred Portfolio included the retirement of Jeffrey 3 as a base planning assumption to account for the risk of operational issues which could require long-lead-time or expensive repairs, and the risk of needing to install a costly selective catalytic reduction ("SCR") system to comply with environmental mandates. By incorporating this retirement, EKC's 2025 IRP Preferred Portfolio planned to build or procure the capacity needed to replace the resource or a similarly sized resource (Jeffrey 2 or Jeffrey 1). EKC also accounted for impacts of historical outages on capacity accreditation by incorporating performance-based accreditation rules in SPP in the resource plan.

Sierra Club Comment 2: The IRP should evaluate earlier retirement and gas conversion for other units that have been mostly uneconomic on the SPP energy market and/or unreliable.

Response: The IRP solves for the lowest total cost resource plan to meet future energy and capacity needs, considering production costs and fixed costs. Due to increasing resource adequacy needs, load growth, and the high costs of building new resources, as compared to the going-forward costs of maintaining the coal fleet, there are not expected to be many economic retirement opportunities. However, Evergy recognizes that there are risks beyond the expected budget which are not easily quantified in an economic model. Evergy's coal fleet has had recent failures due to age, increased cycling in the market, and extreme weather. In recent experience, there has been a long lead time on replacement parts, exacerbating outage timelines. Either expensive repairs or future compliance with environmental mandates could force future retirement decisions. Additionally, deterioration in operational performance will reduce future capacity accreditation under SPP's new performance-based accreditation policies. Evergy plans to add resources to meet load growth and cover these coal contingencies including potential retirements. Evergy's 2025 IRP Preferred Plan included the conversion of Jeffrey 2 to natural gas operation in 2030 to balance operational risk and mitigate the potential need for future SCR investment while preserving capacity to meet load growth and increased reliability needs. Evergy expects the Jeffrey site to be a prime location for natural gas resources and building gas infrastructure to facilitate conversion at Jeffrey 2 could provide valuable flexibility and optionality to customers. Evergy will continue to evaluate these types of opportunities as they make sense.

Sierra Club Comment 3: The IRP should use the long-term forecasts directly when assuming new resource costs; or at a bare minimum consider the lowest cost bids from its 2023 as a starting point.

Response: Evergy does not agree to use non-transactable forecasts for new resource costs in its IRP, particularly for resource needs in the short-term development window. Evergy uses the NREL and EIA analysis to estimate technological improvement cost curves for future resources, but believes RFP offers and commercial development experience provide the most accurate costs.

Sierra Club Comment 4: The IRP should model PPAs for wind, solar PV, and battery storage resources.

Response: As previously stated by Evergy in its 2021 response to stakeholder concerns in Docket No. 19-KCPE-096-CPL, Evergy and Sierra Club disagree on whether PPAs should be modeled as discrete resource options. There is no requirement in the approved IRP framework requiring the evaluation of Power Purchase Agreements as discrete "supply options." Evergy's position is that the purpose of the IRP is to evaluate generic new resource options and not to determine ownership or financial structure. With that in mind, Evergy believes ownership of new resources is the appropriate "default" option to represent new resources which are being evaluated.[5]

In its May 5, 2022, order concerning this matter (*Order on Joint Filing Regarding Proposed Resolutions to Concerns Raises With 2021 Triennial Integrated Resource Plan)* the Commission found:

> The Commission agrees with Evergy that the issues identified by…Sierra Club are beyond the scope of the question before the Commission – whether Evergy's 2021 Triennial Compliance Filing meets the requirements under the IRP Framework. The Commission finds it does.[6]

[5] Evergy Kansas Responses to Alleged Deficiencies and Concerns, 19-KCPE-096-CPL, at 5 and 6.
[6] Order on Joint Filing Regarding Proposed Resolutions to Concerns Raises With 2021 Triennial Integrated Resource Plan, 19-KCPE-096-CPL, at 4.

Sierra Club Comment 5: The IRP should relax energy market access constraints and allow for more than 10 or 15 percent of all annual energy to be purchased and sold.

Response: The market constraints are intended to consider the expected benefits of market participation while also ensuring that Evergy utilities plan for a future resource mix that is a good physical and economic hedge for customer energy needs.

Sierra Club Comment 6: The IRP should address the congestion in western Kansas and evaluate how it affects the economics of its plans, most notably the new gas resources.

Response: Evergy, with support from outside consultants, has used the SPP integrated transmission planning (ITP) models to generate market price forecasts for the IRP modeling in the past few IRPs. The Company expects to continue to use this process with updated transmission plans for future IRPs. These SPP ITP models provide a stakeholder-informed view of the future resource mix and the expected future transmission topology considering identified infrastructure projects. Evergy's practice has been to use an average system generation pricing point (Metro Generation Hub) for new resources other than wind and storage located in the wind region. The nodes for the new resources have not been established yet and are not included in the completed ITP models. Evergy has applied for interconnection and expects the SPP Definitive Interconnection System Impact Study process to identify the interconnection facilities need to tie into the high voltage grid and network upgrades to support firm dispatchable power delivery. Once the new gas resources are modeled in the market, Evergy will consider their pricing nodes in future modeling.

WHEREFORE, the Company submits this response, as detailed above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above was electronically served, hand-delivered or mailed, postage prepaid, this 26th day of August 2025 to:

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