

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

In the Matter of the Investigation into the)
Principles and Priorities to be Established for)
Evaluating the Reasonableness of the Location) Docket No. 24-GIME-102-GIE
of a Proposed Transmission Line in Future)
Line Siting Proceedings)

**EVERGY COMMENTS IN RESPONSE TO STAFF'S
SECOND REPORT AND RECOMMENDATION**

COMES NOW, Evergy Kansas Central, Inc. and Evergy Kansas South (together as “Evergy Kansas Central”) and Evergy Metro, Inc. (“Evergy Kansas Metro”) (collectively, “Evergy”), and for its comments in response to the Staff of the State Corporation Commission of the State of Kansas’ (“Staff” and “Commission,” respectively) Second Report and Recommendation (“R&R”) regarding Staff’s suggested scope of the instant general investigation, states as follows:

I. COMMENTS

Evergy supports Staff’s adjusted scope for this general investigation to focus on establishing guidelines of land use parameters and construction practices that should be considered in determining the reasonableness of the route in rural areas of an electric transmission line in order to complete the docket in a timely manner. Evergy encourages the Commission to set a timeline and schedule for this docket in order to complete it so that the outcome can be incorporated into any request for proposals that might come out of the Southwest Power Pool’s (“SPP”) approval of the next Integrated Transmission Plan (“ITP”) in November of this year.

Evergy agrees with Staff that the establishment of guidelines of land use parameters and construction practices will send a clear signal to the SPP regarding what would be expected for competitive projects approved in the annual ITP process. The standards for any such projects in

Kansas should influence the assumptions and directives in the Request for Proposals (“RFPs”) SPP issues for competitive bids and the standards by which the Independent Review Panel (“IRP”) would review and score such bid packages submitted by entities wishing to construct and operate transmission lines in Kansas.

As such, Evergy encourages the Commission to issue a schedule for this docket that would culminate in a Commission Order establishing guidelines for land use parameters and construction practices in the September to mid-October timeframe which would be prior to SPP Board of Directors annual ITP approval in early November. This timing is important because the RFPs for new competitive projects would issued shortly thereafter and could take into consideration standards enacted by the Commission.

Evergy proposes the schedule could be formulated as follows:

DATE	TIME	ACTION
April 12, 2024	5:00 pm	Commission issues Order establishing issues and questions to be addressed.
May 24, 2024	5:00 pm	Initial Comments by Parties with supporting affidavits.
June XX	9:00 am	Technical Session with Commissioners – At KCC
July 26, 2024	5:00 pm	Reply Comments with supporting affidavits.
September 6, 2024	5:00 pm	Commission Order

II. CONCLUSION

The issues presented in this docket have great importance to a process that occurs every year in the SPP. The next ITP and resulting competitive projects will be announced in early November. The establishment of standards that support reliable, sufficient, and efficient transmission development in Kansas prior to the next ITP approval would benefit Kansas

landowners, utilities, customers, and potential future transmission owners.

WHEREFORE, Evergy submits these comments in response to Staff's Second Report and Recommendation for Commission review and consideration and or such other relief as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Patrick T. Smith

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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

Patrick T. Smith, upon oath first duly sworn, states that he is Corporate Counsel Director for Evergy Kansas Central, Inc. and Evergy Kansas South, Inc., and Evergy Kansas Metro, Inc. that he has reviewed the foregoing pleading, that he is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of his knowledge and belief.

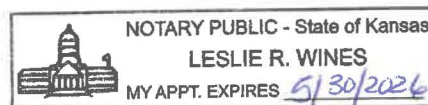


Patrick T. Smith

Subscribed and sworn to before me this 26th day of March, 2024.


Notary Public

My Appointment Expires: May 30, 2026



CERTIFICATE OF SERVICE

I, the undersigned, certify that a true and correct copy of the above and foregoing Everygy Comments to the Staff's Report and Recommendation was served via electronic service this 26th day of March, 2024, to the following:

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