

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

In the Matter of the Capital Plan Compliance )  
Docket for Kansas City Power & Light )  
Company and Westar Energy, Inc. Pursuant ) Docket No. 19-KCPE-096-CPL  
to the Commission's Order in 18-KCPE-095- )  
MER. )

**COMMENTS OF THE CITIZENS' UTILITY RATEPAYER BOARD REGARDING  
THE EVERGY KANSAS METRO AND EVERGY KANSAS CENTRAL CAPITAL  
INVESTMENT PLAN 2023 UPDATE FILING**

COMES NOW, the Citizens' Utility Ratepayer Board (CURB) and, pursuant to the schedule set forth in *Order Adopting Integrated Resource Plan and Capital Plan Framework* issued by the State Corporation Commission of the State of Kansas (“Commission”) in this docket on February 6, 2020,<sup>1</sup> submits its comments regarding the Capital Investment Plan update filed on behalf of Evergy Kansas Metro and Evergy Kansas Central on February 28, 2023. In support thereof, CURB states the following:

**Condensed Background**

1. On May 24, 2018, the Commission issued an Order Approving Merger Application of Westar Energy, Inc. and Kansas Gas and Electric Company, Great Plains Energy Incorporated and Kansas City Power & Light Company to form Evergy, Inc. (“Evergy”) in Docket No. 18-KCPE-095-MER.

2. In paragraph 94 of its Merger Order, the Commission required Westar and KCPL to work with the parties to develop and submit to the Commission a reporting format for an Integrated Resource Plan (IRP) process.<sup>2</sup> This requirement led to the creation of a framework for Evergy to provide a five-year view of capital expenditures and resource acquisition plans.

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<sup>1</sup> Order Adopting Integrated Resource Plan and Capital Plan Framework (February 6, 2020).

<sup>2</sup> Order Approving Merger Application, Docket No. 18-KCPE-095-MER (May 24, 2018).

3. On March 9, 2020, Evergy filed its initial Kansas Capital Investment Plan (“CIP”). This filing forecasted expenditure plans for years 2020 through 2024.

4. On February 26, 2021, Evergy filed its annual update to the Capital Investment Plan with its 2021-2025 projections, with a corrected version filed on March 1, 2021.<sup>3</sup>

5. On June 29, 2021, Staff filed its Report and Recommendation on the 2021 CIP Update (“2021 R&R”).<sup>4</sup> In the 2021 R&R, Staff noted that Docket No. 21-EKME-088-GIE (“21-088 Docket”) was open and that Staff had conducted a review of Evergy’s capital expenditures planning in the Sustainability Transformation Plan (“STP”). Staff concluded that the 2021 CIP Update complied with the Capital Plan framework and recommended acceptance of the same by the Commission. However, Staff noted concerns with the projected level of transmission spend relative to distribution and the related rate impacts.<sup>5</sup>

6. On June 29, 2021, CURB filed its responsive comments on the 2021 CIP Update.<sup>6</sup> CURB incorporated its discussion of Evergy’s STP from the 21-088 Docket into its review of Evergy’s investment plans. CURB emphasized the potential of ratepayers being overburdened by unnecessary investments that increase shareholder value more than enhance the provision of utility services. CURB also highlighted the difficulties ratepayers faced in light of the COVID-19 pandemic and rising transmission costs.

7. On February 28, 2022, Evergy filed its second update to the CIP with the Commission.<sup>7</sup>

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<sup>3</sup> Capital Investment Plan Update – Public on Behalf of Evergy Metro, Inc. (February 26, 2021); Corrected Capital Investment Plan Update (March 1, 2021). (“2021 CIP Update”).

<sup>4</sup> Notice of Filing of Staff’s Report and Recommendation (June 29, 2021). (“2021 R&R”).

<sup>5</sup> Id. at pg. 7.

<sup>6</sup> Comments of The Citizens' Utility Ratepayer Board Regarding Evergy Kansas Metro and Evergy Kansas Central February 28, 2021 Capital Investment Plan Update Filing (June 29, 2021). (“2021 CURB CIP Comments”).

<sup>7</sup> Evergy Kansas Capital Investment Plan Update, public version (February 28, 2022). (“2022 CIP Update”).

8. On June 10, 2022, Evergy filed its 2022 annual update to the IRP.<sup>8</sup>

9. On July 8, 2022, several parties, including CURB, filed responsive comments addressing the Company's 2022 CIP Update. In CURB's comments, CURB reiterated its concerns with rising utility bills associated with increased levels of capital expenditure in a tough economic environment, including inflationary pressures, high energy burden, and flat-to-low load growth.<sup>9</sup> CURB expressed concerns with levels of spending related to transmission and information technology (IT) projects and the potential degree of benefits for ratepayers from these investments. Evergy's evaluation of fuel prices and the focus on renewable investments during the 2022-2026 plan represented an opportunity to transition away from uneconomic fuel sources in the face of an uncertain future. CURB posited that while renewable resources may help mitigate the impact of volatile fuel prices, the lack of load growth and potential bill impacts of such investments calls for careful review of the prudence of these decisions. CURB also concluded that the report complied with the Commission's guidelines for the CIP report filings and did not find any defects with the update.

10. Staff's comments on the 2022 CIP Update expressed concerns regarding rate impacts associated with expanded capital investments.<sup>10</sup> Staff analyzed the projected capital expenditures and highlighted the increase in budget between the 2022-2026 plan to the previous 2021-2025 plan for both jurisdictions (16.36% for Kansas Central and 25.36% for Kansas Metro).<sup>11</sup> Staff also compared the capital expenditure budgets of peer companies and determined that Evergy's projected budgets have kept up with increases by those peers, even with the

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<sup>8</sup> Evergy KS Central and Metro 2022 Annual Update (June 10, 2022). ("2022 IRP Annual Update").

<sup>9</sup> Comments of The Citizens' Utility Ratepayer Board Regarding the Evergy Kansas Metro and Evergy Kansas Central Capital Investment Plan 2022 Update Filing, pg. 4, ¶ 12 (July 8, 2022). ("2022 CIP CURB Comments").

<sup>10</sup> Notice of Filing of Staff's Report and Recommendation (July 8, 2022). ("2022 Staff CIP R&R").

<sup>11</sup> 2022 Staff CIP R&R at pg. 5 of report.

significant increases for Evergy. Despite this conclusion, Staff indicated concerns about the projected levels of capital expenditure and the effects that such expenditures may have on achieving regionally competitive rates.<sup>12</sup> Ultimately, Staff found that Evergy’s 2022 CIP Update report complied with Commission standards. Staff recommended that Evergy slow down the pace of its capital investments by shifting some investments from transmission projects to distribution modernization projects and by considering Purchased Power Agreements (“PPA”) for additional renewable generation rather than utility-owned projects. Further, Staff recommended that Evergy provide updated financial modeling on current expectations of retail rate changes associated with its capital expenditure plans and to present these updated models in a public workshop.

11. On August 25, 2022, Evergy filed its response to parties’ CIP comments.<sup>13</sup> Evergy responded to Staff’s concerns regarding regional rate competitiveness by indicating that its investment plans and execution of the STP have made progress in providing cost savings and reliability benefits for customers and transitioning into a cleaner generation fleet.<sup>14</sup> In regards to increased transmission spend, Evergy emphasized the role of regulatory oversight from the Federal Energy Regulatory Commission (“FERC”) and the Commission, and the importance of maintaining a reliable transmission system through increased investments. Further, Evergy defended its preference for utility-owned renewable generation compared to PPAs, citing to factors such as useful life of assets, per MWh price, and regulatory jurisdictional control.<sup>15</sup> Evergy opposed Staff’s recommendation to provide updated financial modeling on rate impacts associated with the CIP, stating that such a request goes beyond the purpose of this docket and that parties already have the opportunity to review and respond to the CIP through responsive comments every

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<sup>12</sup> Id. at pg. 7.

<sup>13</sup> Evergy Response to Comments Regarding Capital Plan (August 26, 2022). (“2022 Evergy CIP Response”).

<sup>14</sup> 2022 Evergy CIP Response at pgs. 4-7, ¶¶ 10-17.

<sup>15</sup> Id. at pgs. 15-18, ¶¶ 34-42.

year.<sup>16</sup> Evergy also responded to CURB’s remarks regarding the investment into IT and implementation of a new customer experience enhancement system across all of Evergy’s jurisdictions.<sup>17</sup>

12. On September 15, 2022, the Commission issued its order on the 2022 CIP Update report and responsive comments.<sup>18</sup> The Commission found that the 2022 CIP filing met the requirements of the CIP framework. Further, the Commission adopted Staff’s recommendation and ordered Evergy to update its comprehensive financial modeling to provide more transparency into current expectations of retail rate impacts and to present those findings in a public workshop.

13. On December 2, 2022, Evergy filed a document with updates to the CIP report and projected rate impacts along with a presentation which discussed the details and benefits of the CIP.<sup>19</sup> In this update, Evergy provided information regarding its system and the need to invest into aging infrastructure, along with the effect on rates with a comparison to information from peer power companies. The Company emphasized the importance of increased investments to maintain reliability and the impact of rising inflation levels on projected budgets. On December 13, 2022, the Commission held a public workshop for Evergy to present its updated modeling report and allowed Staff and CURB to ask Company representatives questions about Evergy’s plans.

14. On February 28, 2023, Evergy filed its 2023 update report to the CIP.<sup>20</sup> In its cover letter summary, Evergy states that Kansas Central’s CIP plan projections reflect an overall increase of \$823 million from the previous 2022-2026 plan to the current 2023-2027 plan. Evergy explains that the major drivers of this increase are due to increased economic development activities in

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<sup>16</sup> Id. at pgs. 24-25.

<sup>17</sup> Id. at pgs. 20-24.

<sup>18</sup> Order on Capital Investment Plan (September 15, 2022).

<sup>19</sup> Evergy Capital Plan Update (December 2, 2022).

<sup>20</sup> Evergy Kansas Capital Investment Plan Update (February 28, 2023). (“2023 CIP Update”).

Kansas, investments to maintain the existing generation fleet, and estimates for new generation to meet capacity requirements and provide cost-effective service. In terms of rate impact trajectory, Evergy anticipates that this increase in investments would result in an increase to rates of 1.0% on a five-year compound annual growth basis (assuming no sales growth and no other changes to cost of service). Kansas Metro is projecting an increase in spending of \$1 million from the previous plan to the current plan. According to Evergy, this would result in a slight decrease in rate growth before consideration of other changes to cost of service.

15. On June 15, 2023, Evergy filed its 2023 update to the IRP.<sup>21</sup>

### **Capital Investment Plan Format and Compliance**

16. CURB finds that Evergy's 2023 CIP Update filing is in compliance with the framework structure and purpose established by the Commission. Evergy continues to provide both a public and confidential report with insight into its investment plans. Evergy's detailed report of projects completed in 2022 and projected plans for 2023 continue to provide transparency into the Company's plans for capital expenditures. The report is further supplemented with comparisons to planned budgets from prior years and tracks changes in these projections which allows parties to monitor expenditures and progress by the Company. In April 2023, Evergy filed its application for rate changes for both its Kansas Central and Kansas Metro service territories. These filings are inclusive of investments made through 2022, with a true-up expected at the end of June 2023. Many parties, including CURB, are in the process of evaluating capital expenditures for prudence and to recommend rate treatment of these items in Evergy's rate case, Docket Number 23-EKCE-775-RTS ("23-775 Docket"). As part of its role in the CIP and IRP review, CURB reserves the right to modify its position on any particular item in the rate case, as may be

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<sup>21</sup> 2023 KS Central-Metro Annual Update 6-15-2023 (June 25, 2023). ("2023 IRP Update").

appropriate to protect the interests of residential and small commercial ratepayers specifically relative to Evergy's rates.

### **Responsive Comments**

17. At the onset, it is important to note that a number of CURB's concerns from its previous comments still maintain relevancy to the current CIP projections for 2023-2027. The Company continues to grapple with issues such as low residential load growth, regional rate competitiveness goals, ratepayer energy burden, and the pressure to build up rate base and increase shareholder value.<sup>22</sup> Inflation and commodity prices, while slowing down, still present difficulties for consumers to adopt to a new normal in expenses and adjusting budgets.<sup>23</sup> The challenge of balancing the means to maintain sufficient and efficient service through higher investment levels and the bill impact on ratepayers drives the need for utilities and regulators to be creative.

18. The Commission's 2022 orders for a public workshop to discuss financial projections was a great way to add context into Evergy's planning process and the level of consideration given to ratepayer impact. It also provided a good opportunity for the general public to listen to representatives from Evergy, Staff, and CURB describe how each party approached the topics in the presentation. While CURB is not requesting that such a procedure be adopted as a regular part of the IRP framework, we recognize the value that such efforts have on the overall goal of enhancing transparency into Evergy's business. CURB would welcome the opportunity for similar workshops and meetings to monitor projected impacts on rates associated with capital investment planning.

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<sup>22</sup> See Initial CURB CIP Comments at pg. 14, ¶42.

<sup>23</sup> "US consumer price increases slow; underlying inflation sticky" Mutikani, Lucia, Reuters (June 13, 2023). Accessed at: <https://www.reuters.com/markets/us/us-consumer-prices-slow-may-core-inflation-sticky-2023-06-13/>.

19. Evergy’s increase in expenditures for the Kansas Central jurisdiction is a response to changing resource adequacy projections due to the pace of economic development in Kansas and membership requirements with the Southwest Power Pool (“SPP”). It has been announced that Kansas gained a significant economic opportunity in the form of the construction and operation of a new electric vehicle battery plant by Panasonic in the De Soto, Kansas area.<sup>24</sup> Evergy states that the Panasonic facility’s load is forecasted to be twice as large as the current largest customer in the Kansas Central area.<sup>25</sup> Notwithstanding construction energy needs prior to operations, the new load associated with the plant is expected to ramp up in the next few years. Further, SPP is implementing a change to the required planning reserve margin for its members, raising the margin of available generation attributable to each member from 12% to 15%. SPP will also be altering how it accredits generation based on historical performance of a resource. CURB previously highlighted this upcoming change in its responsive comments to the 2022 IRP update.<sup>26</sup> In April 2023, in the 23-775 Docket, Evergy witness Kayla Messamore elaborated on the changes to resource accreditation. She explains that it is the process by which SPP determines how much of a resource’s capacity can be claimed for meeting SPP’s reserve margin requirements.<sup>27</sup> Ms. Messamore indicates, as an example, that renewable resources receive lower capacity credit with the SPP compared to firm, dispatchable power from coal, nuclear, or natural gas. The new SPP accreditation rules would take into account actual reliability performance metrics.<sup>28</sup> Ms. Messamore indicated that these rules are not yet in place while SPP redoes its tariff in response to

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<sup>24</sup> “Panasonic breaks ground on massive battery plant predicted to transform KC region” Pepitone, John and Barry, Kevin, Fox4 News (November 2, 2022). Accessed at: <https://fox4kc.com/business/panasonic-breaks-ground-on-massive-battery-plant-predicted-to-transform-kc-region/>.

<sup>25</sup> Direct Testimony of Kayla Messamore, pg. 5, Ins. 11-17, Docket No. 23-EKCE-775-RTS (April 25, 2023). (“23-775 Messamore Direct Testimony”).

<sup>26</sup> The Citizens' Utility Ratepayer Board Comments to the 2022 Annual Update to Evergy's Integrated Resource Plan, pg. 7, ¶17. (August, 29, 2022).

<sup>27</sup> 23-775 Messamore Direct Testimony at pg. 7. Ins. 9-23.

<sup>28</sup> Id.

a March 2023 FERC order. However, Evergy anticipates that these changes will result in lower capacity credit ratings and warrant the acquisition of new resources to not only adapt to the reduction, but to address load growth attributed to economic development.

20. CURB views the connection between the 2023 CIP update and these external factors as being reflected in Evergy’s adjustment to investment levels for new renewables and other generation. In the 2022 CIP Update, Evergy justified the expenditure increases as a commitment to pursue clean energy and decarbonize Evergy’s fleet. However, the tone appears to have changed in 2023, and now investment levels are supported by the need to respond to increasing industrial load growth and credit downgrading by SPP. The rearrangement of budgets between 2023 and 2027 for renewable generation illustrates a shift in plans for renewable resources. The 2023 CIP Update reflects a \$255 million decrease in year 2023 with \$255 million being added in 2027. In response to Kansas Electric Power Cooperative (“KEPCo.”) DR 4-02,

\*\* [REDACTED]

[REDACTED] .\*\*29 \*\* [REDACTED]

[REDACTED]

[REDACTED] .\*\* Changes at SPP and the potential of large economic

development did not occur overnight, but rather have been a topic of discussion for some time.

While CURB understands this shift of budget in the updated plan, this point serves to demonstrate

the flexible nature of the CIP. However, CURB’s concern is the dynamic nature of Evergy’s

justification for these large expenditures. The pronounced shift from focusing on an on-going

decarbonization strategy, which accounted for \$445 million in 2022’s update, to now meeting new

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<sup>29</sup> KEPCo. DR. 4-02(b). Attached as Appendix A.

industrial load growth and capacity reserve requirements, begs the question of whether Evergy is chasing a justification to make investments rather than investing for the needs of ratepayers.

21. It is unclear how, if at all, Residential load growth factored into the investment strategy, except perhaps in addressing existing aging infrastructure issues. While addressing aging infrastructure is an important aspect of capital expenditures, Evergy should focus on projects that will benefit the ratepayers who will be paying those costs. Evergy's desire to achieve certain goals should not overshadow the risk of burdening ratepayers, especially low-income residential ones, with expenses that do not serve them.

22. Like Staff, CURB has previously raised concerns with transmission spending levels and the commensurate benefits for ratepayers. For Kansas Central, transmission spend remains relatively unchanged between the 2022-2026 plan and 2022-2027 plan, and accounts for approximately 34.6% of the 2027-inclusive plan expenditures.<sup>30</sup> Distribution projects, as identified by Staff as a place to shift transmission spend, makes up 23.3% of Central's budget. For Kansas Metro, the opposite trend appears with transmission expenditures making up approximately 16.2% of the 2023-2027 plan and distribution comprising 35.9%.<sup>31</sup> In terms of renewable investment, Kansas Metro projections show approximately \$52 million being spent in 2023 on new generation where none was previously planned, and then moderate decreases to projected budgets through 2026. 2027 looks to include some new generation, though at a lower level compared to prior years' projections in the plan. Kansas Metro is unique in that it is not experiencing the same degree of economic development changes to load as Kansas Central. The focus on distribution expenditures in Kansas Metro will hopefully provide significant benefits at comparatively less cost for ratepayers in that area.

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<sup>30</sup> 2023 CIP Update at pg. 3.

<sup>31</sup> Id. at pg. 78.

23. Demand Side Management (“DSM”) programs in Kansas remain in flux after the presentation of evidence and briefs in Docket No. 22-EKME-254-TAR. In that docket, the Commission has been presented with two alternative proposals to implement DSM and energy efficiency programs. Each proposal offers varying levels of investment and projected savings and benefits, for both the Company and ratepayers. An order on these proposals has not yet been issued. In terms of resource acquisition planning, Evergy has elected to assume DSM levels associated with the smaller set of programs, thus assuming a lower level of resources to meet demand.<sup>32</sup> As Evergy notes in its 2023 IRP Update, the preferred portfolio represents a higher cost compared to a plan with a “full” implementation of DSM programs based on the comparative need to invest in new generation to meet demand. Long-term value of DSM programs can help mitigate the need to invest in new generation depending on levels of energy savings achieved by those programs. As DSM develops in Kansas, Evergy may be spurred into re-evaluating both its CIP and IRP to determine prudent levels of investment to meet current and future demand.

24. Evergy’s 2023 IRP Update has forecasted natural gas prices higher than previous years in response to stakeholder concerns about recent price volatility and lower projections.<sup>33</sup> Volatility in the natural gas market has been attributed to the ongoing war in Ukraine, supply chain pressures, global demand, and inflation. Evergy finds support for its higher forecast from factors such as higher breakeven production costs, producer discipline, and increased global demand despite lower gas prices. While a higher forecast may reflect a more accurate economic reality, it also warrants concerns about the future of electric service in Kansas. The Energy Information Administration (“EIA”) recently reported that electric generation by natural gas in the United

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<sup>32</sup> 2023 IRP Update at pg. 6 of report, Section 1.4.1.

<sup>33</sup> 2023 IRP Update at pg. 35, Section 4.1.3.

States reached record-high levels for the past winter season.<sup>34</sup> The EIA notes that natural gas generation peaks in the summer when demand is at its greatest, while coal generation has been experiencing declines due to plant retirement trends and supply disruptions. In light of the future changes to resource accreditation at SPP, it remains to be seen how increased reliance upon any particular fuel source will impact both operational costs and capital expenditure decisions beyond the current plan scope. If Evergy continues to pursue a robust decarbonization plan with renewable generation, it will likely be natural gas-powered plants that provide support for baseload generation over other sources due to reliability concerns. While customers can have varying opinions on how their energy is sourced, all customers are mindful of rising bills and the impacts that can have on household budgets.

25. If economic development continues to grow in Kansas, then the need for more capacity will grow, likely at a rate that outpaces residential growth. While generation expenditures to support economic development may be geared towards serving large commercial and industrial rate classes, there are no guarantees that the resulting bill impacts will be limited to those classes. Subsequent rate designs may allocate a portion of this generation to all ratepayers, rather than just those customers whose load Evergy says it is specifically acquiring more resources for. That is even before considering the presence of specific economic development contracts and tariffs that are designed to offer rate incentives to attract new business. CURB believes it is important to foster an attractive environment for new industry to spring up in Kansas. The potential benefits associated with increased economic activity and paid taxes can be a boon for the state. However, such benefits may only be limited to the immediate geographical area in which a new industry operates. System-wide costs incurred to serve those customers may still be socialized among all customers. Once

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<sup>34</sup> “U.S. electricity generation from natural gas was highest on record this past winter,” U.S. Energy Information Administration (June 7, 2023). Accessed at: <https://www.eia.gov/todayinenergy/detail.php?id=56740>.

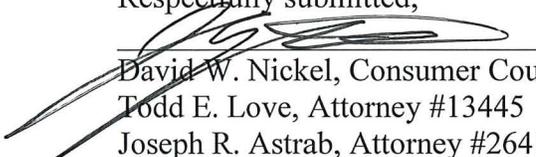
these capital expenditures are made, it is difficult to pull those costs out of rates. That statement underlines the importance of the CIP and IRP process to improve transparency into Evergy's resource planning and the value in feedback from stakeholders and regulators who provide unique perspectives in the area of utility service and regulation.

**Conclusion**

26. CURB believes that the 2023 CIP Update filing complies with the Commission's framework and would recommend the Commission to find the same. The detailed reports provide insight into resource planning and when combined with the narrative context of the IRP updates, it helps stakeholders stay up to speed with the Company's efforts to serve Kansas. CURB recognizes the challenges that Evergy faces in meeting increased industrial demand and SPP requirements and urges Evergy to remain mindful of the financial impacts on all ratepayers associated with addressing them. It is incumbent on the utility and regulators to ensure that prudent expenditures are made and recovered in rates that provide sufficient and efficient service for all ratepayers at a level that does not create a one-sided burden on any particular class of customer.

WHEREFORE, CURB respectfully asks the Commission to find that the 2023 CIP annual update filing complies with the Commission's Capital Plan framework and to issue any other orders as deemed appropriate.

Respectfully submitted,



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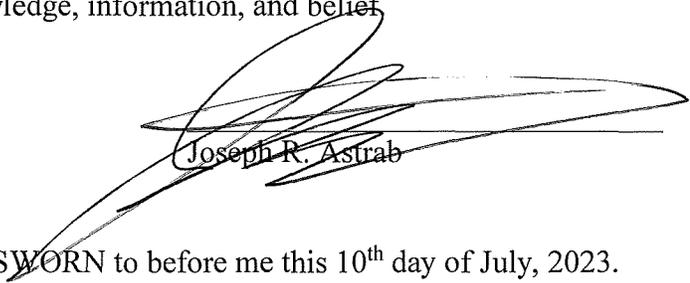
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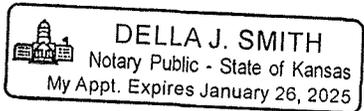
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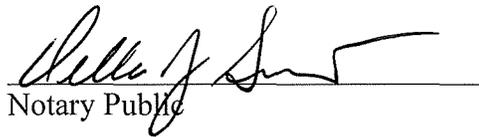
STATE OF KANSAS                    )  
                                                  )  
COUNTY OF SHAWNEE            )        ss:

I, Joseph R. Astrab, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief

  
\_\_\_\_\_  
Joseph R. Astrab

SUBSCRIBED AND SWORN to before me this 10<sup>th</sup> day of July, 2023.



  
\_\_\_\_\_  
Notary Public

My Commission expires: 01-26-2025.

## **APPENDIX A**

### **Referenced Data Request:**

KEPCO-4-02 (Redacted Response)

KCPL and Westar  
Case Name: 2019 Capital and IRP Reporting Format  
Case Number: 19-KCPE-096-CPL

Requestor Howe Nathan -  
Response Provided April 18, 2023

Question:KEPCO-4-02

RE: In re Capital Plan Compliance Docket for Kansas City Power & Light Company and Westar Energy, Inc. Pursuant to the Commission's Order in 19-KCPE-095-MER.

Please Provide the Following:

Please refer to the public version of Evergy's 2022 Capital Investment Plan filed in this docket on February 28, 2023 ("2023 Capital Plan") at p. 1, Lines 2, 11, and 20 providing planned capital investment amounts for "Generating Facilities: New Renewables" under the "Current Plan" and "Prior Plan," and comparing "Current Versus Prior Plan."

- a. Please provide an update to QKEPCO-2-02\_CONF\_KSC Renewable Capex Plan comparing the Current Plan to the Prior Plan for the relevant 2023 to 2027 period.
- b. Evergy's "Preferred Portfolio" from its 2022 Integrated Resource Plan Annual Update filed in this docket on June 10, 2022 ("2022 IRP"), "CDAAA" ("Preferred Portfolio"), contemplates 190 MW of new solar resources in 2024 and 350 MW of new wind resources in 2025. Please explain why Evergy has reduced projected capital investment in New Renewables/New Generation by \$255 million (i.e., from \$258 million in the Prior Plan to \$2 million in the Current Plan) in 2023.
- c. Please explain the basis for the reduction of \$56 million of projected capital investment in 2025 under the Current Plan.
- d. Please explain the basis for the new \$362 million of projected capital investment in 2026 under the Current Plan, when no investment was projected for 2026 under the Prior Plan. Please specify where such new resources are identified in the 2022 IRP, including the resource type, capacity amount, and year the resource will be placed into service.
- e. Please explain the basis for the new \$255 million of projected capital investment in 2027, Please specify where such new resources are identified in the 2022 IRP, including the resource type, capacity amount, and year the resource will be placed into service.

**RESPONSE:** (do not edit or delete this line or anything above this)

**Confidentiality:** CONFIDENTIAL

**Statement:** (3) Market analyses or other market-specific information relating to services offered in competition with others.

**Response:**

a. [REDACTED]

b. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED].

c. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED].

d. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED].

e. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED].

**Information provided by:** John M. Grace, Sr. Dir. Corporate Planning and Financial Performance

**Attachment(s):** QKEPCO-4-02\_CONF\_KSC Renewable Capex Plan



**Verification:**

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*  
Director Regulatory Affairs

## CERTIFICATE OF SERVICE

19-KCPE-096-CPL

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 10<sup>th</sup> day of July, 2023, to the following:

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