

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

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

**COMMENTS OF THE CITIZENS' UTILITY RATEPAYER BOARD REGARDING  
THE 2025 ANNUAL UPDATE INTEGRATED RESOURCE PLAN FILING**

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB") and submits its comments pursuant to the procedure set forth in the State Corporation Commission of the State of Kansas ("Commission") *Order Opening Docket* issued in this docket on December 14, 2023, and as amended by Commission order on June 5, 2025, and the *Order Opening Docket Order Adopting Integrated Resource Plan and Capital Plan Framework* issued in Docket No. 19-KCPE-096-CPL on February 6, 2020,<sup>1</sup> which requires the filing of triennial reports and annual updates on Eversource's Integrated Resource Plan ("IRP").

**Background**

1. On May 24, 2018, the Commission issued an Order Approving Merger Application ("Merger Order") of Westar Energy, Inc. and Kansas Gas and Electric Company ("Westar"), Great Plains Energy Incorporated and Kansas City Power & Light Company ("KCPL") to form what is now known as Eversource Kansas Central, Inc., Eversource Kansas South, Inc. (together "Eversource Kansas Central" or "EKC"), and Eversource Kansas Metro, Inc. ("Eversource Kansas Metro" or "EKM", collectively "Eversource" or "Company") in Docket No. 18-KCPE-095-MER ("18-095 Docket"). In

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

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 IRP process.<sup>2</sup>

2. On September 4, 2018, Docket No. 19-KCPE-096-CPL (“19-096 Docket”) was opened for intervenors to work with the Company to develop a procedural framework for the IRP to comply with the Merger Order.<sup>3</sup> This docket would serve as the repository for reports and filings from Evergy regarding plans for capital investment and resource acquisition, pursuant to a detailed framework on reporting requirements and content.<sup>4</sup> The Commission required Evergy to submit triennial filings in tandem with the IRP filings made in Missouri, beginning in 2021. In between the triennial filings, Evergy must also submit annual updates to the IRP and document changes to inputs and forecasts. Intervenors, such as CURB, as well as Commission Staff (“Staff”) may file responsive comments regarding the contents of the reports and compliance with the terms of the established framework.

3. On December 14, 2023, the Commission gave approval to open the present docket to receive the 2024 IRP filings and granted intervention to all parties from the 19-096 Docket.<sup>5</sup>

4. On May 17, 2024, Evergy filed its triennial update to the IRP and accompanying reports (“2024 IRP Filing”).<sup>6</sup> Subsequent to this filing, numerous parties, including CURB provided responsive comments to the filing and definitive conclusions on Evergy’s compliance with the reporting standards. On January 30, 2025, the Commission issued an order finding that

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

<sup>3</sup> Joint Filing Regarding Capital Plan and Integrated Resource Plan Reporting Format Compliance 19-KCPE-095-MER, Docket No. 19-KCPE-096-CPL, Sept. 4, 2018.

<sup>4</sup> Order Adopting Integrated Resource Plan and Capital Plan Framework, Attachment A, Docket No 19-KCPE-096-CPL, Feb. 6, 2020. (“IRP Framework”)

<sup>5</sup> Order Opening Docket, Dec. 14, 2023.

<sup>6</sup> Evergy Integrated Resource Plan Filing, May 17, 2024.

the 2024 IRP Filing complied with the requirements of the IRP framework, while encouraging parties to continue working through issues through future iterations of the IRP.<sup>7</sup>

5. On May 1, 2025, Evergy filed update reports to the 2024 IRP Filing with new data in separate documents for its EKC and EKM territories (“2025 IRP Updates”).<sup>8</sup>

### **CURB’s Comments**

6. CURB concludes that the 2025 IRP Updates for EKC and EKM complies with the reporting requirements under the IRP framework. The IRP framework states that the purpose of the IRP process is to present the utility’s preferred portfolio of resources.<sup>9</sup> Under the framework, the Commission is not setting out to make substantive findings or approval of any determination or analyses done by the Company. Instead, such a review is done in other dockets, such as under the Predetermination statute, K.S.A. 66-1239, when a utility implements its resource acquisition plans. CURB intends on intervening and participating in those types of dockets and reserves the right to raise arguments and positions stemming from the 2025 IRP Updates at the appropriate time. Silence on any particular item in these comments should not be construed as CURB’s acceptance or rejection of that item.

7. Evergy organized the 2025 IRP Updates in a format like the annual updates previously filed in the 19-096 Docket. However, EKC and EKM have been separated into distinct filings, which increases the focus for each jurisdiction in their respective filings. This change reflects the growing differences in needs and circumstances for each jurisdiction and allows for more detailed analyses to be provided in specific filings. Evergy’s analysis provides significant

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<sup>7</sup> Order Finding Evergy’s 2024 IRP Complied with Requirements of Capital Plan Framework, (January 30, 2025).

<sup>8</sup> Evergy Kansas Central, Inc. Triennial Compliance Docket for the Integrated Resource Plan (May 1, 2025) (“2025 EKC Update”); Evergy Kansas Metro, Inc. Triennial Compliance Docket for the Integrated Resource Plan (May 1, 2025). (“2025 EKM Update”)

<sup>9</sup> IRP Framework, pg. 1.

detail into its process and examines a number of inputs and scenarios to forecast and compare resource acquisition plans that account for uncertainty stemming from various factors and conditions, as called for in the IRP framework.

8. Evergy is making a shift towards natural gas-fired resources to meet future challenges in Kansas. Two factors are driving the need for additional resources in the near term: Southwest Power Pool (“SPP”) resource adequacy rules and study results for new reserve margin requirements and capacity accreditation; and lower contributions to capacity from Demand-Side management sources in the face of higher growth expectations.<sup>10</sup> CURB associates the higher growth expectation with increased economic development activity in Kansas. Evergy has incorporated more projections for load growth from large commercial and industrial customers associated with economic development efforts.<sup>11</sup> Due to timing and availability of information when Evergy performs its IRP analyses, CURB expects Evergy to continually update load forecasts in each iteration as more certainty surrounding new load timing becomes available via commitments from new customers.

9. CURB believes as new load forecasts anticipate significant needs, Evergy will seek to make investments and acquire assets that would not have been needed, but for these new large load customers. At the same time, aging coal generation assets are approaching projected retirement dates. Although the 2025 IRP Update has extended several possible retirement and conversion dates for these assets,<sup>12</sup> such assets will likely be retired or no longer using coal by 2040. As Evergy executes its retirement plans over the next decade, Evergy will look to build new generation assets and request recovery of costs to retire plants. Natural gas-fired generation is

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<sup>10</sup> 2025 EKC Update, pg. 5.

<sup>11</sup> Id. at pgs. 12-14.

<sup>12</sup> Id. at pgs. 53-54

projected to be the primary resource to fill that gap and accommodate new load growth through the 2030s.

10. The trends identified above represent a significant shift both in resource acquisition philosophy and ratepayer bill impacts. Previously, Evergy expressed the importance of diversifying its generation mix and incorporating renewable energy resources into its acquisition plans. However, changed circumstances have shifted this focus to procuring resources for the purpose of meeting huge spikes in demand and complying with SPP resource adequacy requirements, including new summer and winter reserve margins. Although Evergy is still adding renewable resources, plans to add these resources are being pushed outside of the 2030s in favor of natural gas acquisitions.<sup>13</sup>

11. CURB supports pursuing least-cost plans and resource types in order to mitigate impacts of volatility with fuel prices and significant construction and maintenance costs, especially due to external pressures like inflation and supply constraints. In this regard, Evergy has modeled several alternative resource scenarios that adjust plans to account for these factors and to accommodate different levels of certain resources.<sup>14</sup> These alternative plans are compared to Evergy's selected portfolio over different planning scenarios and cost considerations. These alternatives are used as a comparison point to explore options per stakeholder feedback. However, it is unclear to what extent such plans can be adopted or used in Predetermination filings. In Docket No. 25-EKCE-207-PRE, the Commission is currently considering arguments from parties regarding alternatives that may not fit Evergy's selected portfolio. An order is due in the near future and may provide guidance on how these alternative plans can be evaluated outside of the IRP framework. Although CURB is not recommending that the Commission select an alternative

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<sup>13</sup> 2025 EKC Update at pg. 53, Figure 22.

<sup>14</sup> Id. at pgs. 62-67.

plan in this docket, clarity on the evidentiary value of these plans may warrant a closer examination of certain scenarios as part of the IRP process and prior to building new resources.

### **Conclusion**

12. CURB believes that the 2025 IRP Updates comply with the IRP framework set out in the 19-096 Docket. CURB anticipates that stakeholders will continue to supply recommendations and identify areas of deficiency through the IRP and any docket in which Evergy's resource plans are discussed. CURB remains committed to engaging in dialogue with the Company, Commission Staff, and stakeholders to refine future iterations of the IRP and developing robust evidentiary records for the Commission's consideration in other dockets. As the Company gains clarity on large load growth and cost drivers, CURB expects the inputs used in the 2025 IRP Updates to change, resulting in dramatic shifts in priorities and perspectives on resource planning as compared to previously updates.

WHEREFORE, CURB submits these comments to Evergy's 2025 IRP Filing for the Commission's consideration and asks that the Commission issues any and all orders it deems appropriate.

Respectfully submitted,



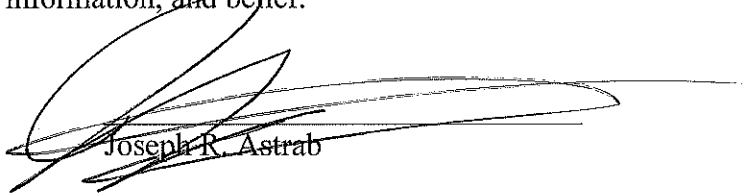
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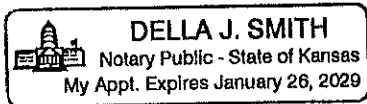
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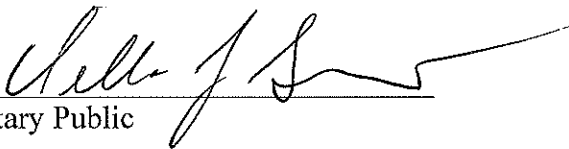
STATE OF KANSAS                    )  
  )  
COUNTY OF SHAWNEE            )       ss:

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 2<sup>nd</sup> day of July, 2025.



  
Notary Public

My Commission expires: 01-26-2029.

**CERTIFICATE OF SERVICE**

24-EKCE-387-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 2<sup>nd</sup> day of July, 2025, to the following:

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