## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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In the Matter of the Petition of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Determination of the Ratemaking Principles and Treatment that Will Apply to the Recovery in Rates of the Cost to be Incurred for Certain Electric Generation Facilities under K.S.A. 66-1239.

Docket No. 25-EKCE-207-PRE

## MOTION TO FILE SUPPLEMENTAL TESTIMONY

COMES NOW the Kansas Industrial Consumers Group, Inc. ("KIC")<sup>1</sup> to file supplemental testimony in the above captioned matter.<sup>2</sup> In support of its motion, KIC states to the State Corporation Commission of the State of Kansas ("Commission" or "KCC") as follows:

1. The Commission held an evidentiary hearing in this docket on April 21 through April 23, 2025. At the close of the proceedings. Commission Chair Andrew French notified the parties as presiding officer that additional information related to long term natural gas pricing, supply and transportation outlook would be beneficial to the Commissioners in their analysis of those issues. As such, Commissioner French stated that the parties may have until May 5, 2025, to file by motion such additional analyses, documents, exhibits, or testimony.

2. The attached supplemental testimony and exhibits of Michael P. Gorman of Brubaker & Associates, Inc. analyzes these issues discussed above. Accordingly, neither Evergy nor the other intervenors in this docket will be unsuspecting of the contents of Mr. Gorman's

<sup>&</sup>lt;sup>1</sup> KIC and its Participating Members include: Associated Purchasing Services, Cargill, Incorporated, The Goodyear Tire & Rubber Company, Lawrence Paper Company, Occidental Chemical Corporation, and Spirit AeroSystems, Inc.

<sup>&</sup>lt;sup>2</sup> Also supporting this Motion are: the Kansas Grain and Feed Association, the Kansas Agribusiness Retailers Association, and the Renew Kansas Biofuels Association.

supplemental testimony and no parties will be negatively impacted by this request to file supplemental testimony. The granting of this request will provide the Commissioners, as requested, with additional information in evaluating the differing perspectives of this issue and ultimately assist in its final determination of the same.

WHEREFORE, KIC requests permission to file the attached supplemental testimony in this docket.

Respectfully submitted,

/s/ James P. Zakoura James P. Zakoura, KS 07644 Lee M. Smithyman, KS 09391 Daniel J. Buller, KS 25002 Sarah C. Otto, KS 27954 Molly E. Morgan, KS 29683 FOULSTON SIEFKIN LLP 7500 College Boulevard, Suite 1400 Overland Park, KS 66210-4041 Telephone: 913-253-2142 Email: jzakoura@foulston.com lsmithyman@foulston.com sotto@foulston.com mmorgan@foulston.com

Attorneys for Intervenor

## VERIFICATION

STATE OF KANSAS ) ) ss: COUNTY OF JOHNSON )

James P. Zakoura, being duly sworn upon his oath, deposes and states that he is the Attorney for KIC, that he has read and is familiar with the foregoing *Motion to File Supplemental Testimony*, and that the statements therein are true to the best of his knowledge, information, and belief.

James P. Jakouro

SUBSCRIBED AND SWORN to before me this 5th day of May 2025.

Notary Public

My Appointment Expires:



### CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May 2025, the above and foregoing was

electronically filed with the Kansas Corporation Commission and that one copy was delivered

electronically to all parties on the service list as follows:

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## OF THE STATE OF KANSAS

In the Matter of the Petition of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Determination of the Ratemaking Principles and Treatment that will Apply to the Recovery in Rates of the Cost to be Incurred for Certain Electric Generation Facilities Under K.S.A. 66-1239.

Docket No. 25-EKCE-207-PRE

Supplemental Testimony and Exhibits of

Michael P. Gorman

On behalf of

Kansas Industrial Consumers Group, Inc.

May 2, 2025



Project 11777

## OF THE STATE OF KANSAS

In the Matter of the Petition of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Determination of the Ratemaking Principles and Treatment that will Apply to the Recovery in Rates of the Cost to be Incurred for Certain Electric Generation Facilities Under K.S.A. 66-1239.

Docket No. 25-EKCE-207-PRE

STATE OF MISSOURI

SS

**COUNTY OF ST. LOUIS** 

## Affidavit of Michael P. Gorman

Michael P. Gorman, being first duly sworn, on his oath states:

My name is Michael P. Gorman. I am a Managing Principal with Brubaker & 1. Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by the Kansas Industrial Consumers Group, Inc. and its participating members in this proceeding on their behalf.

Attached hereto and made a part hereof for all purposes is my supplemental 2. testimony and exhibits which were prepared in written form for introduction into evidence in Kansas State Corporation Commission Docket No. 25-EKCE-207-PRE.

3. I hereby swear and affirm that the testimony and exhibits are true and correct and that they show the matters and things that they purport to show.

101 N

Michael P. Gorman

Subscribed and sworn to before me this 2<sup>nd</sup> day of May, 2025.



Notary Public

## OF THE STATE OF KANSAS

In the Matter of the Petition of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Determination of the Ratemaking Principles and Treatment that will Apply to the Recovery in Rates of the Cost to be Incurred for Certain Electric Generation Facilities Under K.S.A. 66-1239.

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## OF THE STATE OF KANSAS

In the Matter of the Petition of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Determination of the Ratemaking Principles and Treatment that will Apply to the Recovery in Rates of the Cost to be Incurred for Certain Electric Generation Facilities Under K.S.A. 66-1239.

Docket No. 25-EKCE-207-PRE

## Supplemental Testimony of Michael P. Gorman

## 1 Introduction

- 2 Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
- 3 A Michael P. Gorman. My business address is 16690 Swingley Ridge Road, Suite 140,
- 4 Chesterfield, Missouri 63017.

## 5 Q WHAT IS YOUR OCCUPATION?

A I am a consultant in the field of public utility regulation and a Managing Principal with
the firm of Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory
consultants.

## 9 Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

- 10 A I am appearing in this proceeding on behalf of Kansas Industrial Consumers Group,
- 11 Inc. ("KIC") and its participating members Associated Purchasing Services, Cargill,
- 12 Inc., Goodyear Tire & Rubber Company, Lawrence Paper Company, Occidental
- 13 Chemical Corporation, and Spirit AeroSystems, Inc. KIC is a group of large industrial

customers which purchase substantial amounts of retail electric service from Evergy
 Kansas Central, Inc. and Evergy Kansas South, Inc. (collectively referred to as "Evergy
 Kansas Central" or "EKC"). The companies collectively will be referred to as "Evergy"
 or "Company."

## 5 Q ARE YOU THE SAME MICHAEL P. GORMAN WHO PREVIOUSLY FILED 6 TESTIMONY IN THIS PROCEEDING?

7 A Yes, I am. On March 14, 2025, I filed direct testimony on behalf of KIC. I also filed
8 cross-answering testimony on behalf of KIC on March 21, 2025.

## 9 Q WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL TESTIMONY?

10 А My testimony will supplement the importance of determining the availability of firm 11 natural gas delivery, pipeline capacity, and adequate resources to supply the Viola and 12 McNew generating stations, and whether there is a need to extend gas infrastructure. 13 If actual gas availability does not meet planning assumptions, then actual operating 14 costs of these facilities will be dramatically different than that reflected in Evergy's 15 forecast. Second, I comment on natural gas costs, and other fuel types for generating 16 resources. This also illustrates the uncertainty of gas prices going forward and I 17 recommend the Commission carefully consider the merit of significantly increasing 18 reliance on gas-fired generation when the availability and cost of firm natural gas 19 delivery and availability of sufficient gas supply has not been adequately developed in 20 this case to date.

## 1 Gas Price Outlook

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## 2 Q ARE YOU AWARE OF ANY STUDIES THAT PROJECT THE COST OF NATURAL

## GAS AVAILABLE IN THE EVERGY KANSAS CENTRAL SERVICE TERRITORY?

4 А Attached to my Supplemental Testimony is Exhibit KIC-12, which is the SPP's Yes. 5 Future Energy & Resource Needs Study ("FERNS") conducted by Brattle ("Brattle 6 Study"). This study provides outlooks for the forward natural gas prices of the Kansas 7 and Missouri regions and the retail ratepayer cost impact of those prices. The Brattle 8 Study specifically models "SPP Gas Hub Pricing" for Kansas and Missouri, since it 9 provides relevant information for Evergy's service area. Also attached hereto is 10 Exhibit KIC-11. In summary, when comparing Exhibit KIC-12 with Exhibit KIC-11, this 11 comparison illustrates the relationship between coal and natural gas. In Exhibit KIC-11, 12 the relationship of coal and gas on a kWh basis for 2020-2024 is illustrated, and this is 13 the assumed relationship between those fuel types going forward. Natural gas 14 becomes a larger percentage of total fuel and is, in addition, more expensive and 15 volatile than coal. Upon examination of the Brattle Study (Exhibit KIC-12), SPP's 16 forecasted ITP 2025 prices are generally higher than some other national forecasts 17 (NREL and EIA's AEO).

## 18 Q WHAT SOURCES OF DATA DOES BRATTLE USE TO PREDICT FUEL PRICES?

A According to page 14 of the Brattle Study, the fuel prices consist of "[n]atural gas, coal,
and oil prices (by SPP zone) from SPP IHS forecasts and 2024 and 2025 ITP;
additional fuel types supplemented from other public sources like the NREL."

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## Q DOES THE BRATTLE STUDY COMMENT ON SIGNIFICANT DETERMINANTS OF

## 2 THE STUDY'S OPTIMAL RESOURCE MIX RESULTS?

A Yes. On page 17, the study states that the high natural gas price predictions and cost
 assumptions for other generation sources are a significant determinant of the optimal
 resource mix (i.e., lower cost generation sources are preferrable to those that are more
 expensive).

## 7 Q WHAT SPECIFICALLY DOES THE BRATTLE STUDY ILLUSTRATE ABOUT 8 NATURAL GAS PRICES?

9 A On page 36, the report shows "SPP Gas Hub Pricing" for Kansas and Missouri. The 10 prices are adjusted using an inflation rate of 2.6%. In 2023, natural gas prices start at 11 about \$3/MMBtu, rising to about \$6-7/MMBtu in 2029 and 2030 (the commercial 12 operation dates for Viola and McNew, respectively), and are expected to rise to 13 \$10+/MMBtu by 2050.

## 14 Q WHAT SPECIFICALLY DOES THE BRATTLE STUDY ILLUSTRATE ABOUT COAL

- 15 **PRICES?**
- A On page 37, the study shows "SPP Coal Prices" for Kansas and Missouri. These prices
  are also adjusted using an inflation rate of 2.6%. The chart illustrates that coal prices
  were about \$2.50/MMBtu in 2023 and are expected to rise about \$4/MMBtu by 2050.

## 1 Firm Delivery Infrastructure Importance

2 Q ARE THERE ANY PRACTICAL EVENTS AROUND THE COUNTRY THAT 3 ILLUSTRATE THE IMPORTANCE OF HAVING FIRM GAS INFRASTRUCTURE 4 CAPACITY AVAILABLE TO MEET THE GAS DEMANDS OF REGIONS FOR 5 ELECTRIC GENERATION AND OTHER PURPOSES?

6 A Firm gas capacity constraints have been noted in North Carolina, and more recently in
7 Southern California. These capacity constraints have had dramatic impacts on the cost
8 of natural gas in those regions.

9 Natural gas capacity constraints have been impacting natural gas prices in 10 North Carolina for some time, but more recently the state has been considering 11 decarbonization and the installation of more low carbon emitting natural gas resources. 12 Duke Energy has informed the North Carolina Utilities Commission of the need to 13 expand firm gas delivery capacity to accommodate the planned addition of natural gas 14 generation.<sup>1</sup> Duke is proposing to develop new intra-state pipeline capacity to connect 15 the Transco pipeline to a regional production field, and with Transco to expand 16 intrastate capacity in North Carolina to deliver the new gas supply to delivery points in 17 the state. The cost of natural gas in North Carolina has been negatively impacted by 18 its limited delivery capacity. The attached Exhibit KIC-13 shows the spread or basis 19 differential between gas on Transco, the pipeline that serves North Carolina, and other 20 jurisdictions. Transco Zone 5 is just north of North Carolina in southern Virginia and 21 Transco Zone 4 is in Alabama. As shown on this graph, gas prices in Zone 5 have 22 been consistently higher than gas prices in Zone 4, but during constrained or high 23 demand periods, the price basis spread in Zone 5 widens considerably. The planned

<sup>&</sup>lt;sup>1</sup> State Of North Carolina Utilities Commission Raleigh, Docket Nos. E-2 SUB 1318, and EC-67, SUB 55, Order Granting Certificate of Public Convenience and Necessity, December 6, 2024 at 26.

- 1 expansion of firm gas delivery capacity in North Carolina is expected to moderate the
- 2 gas cost premium and to firm up gas delivery capacity.
  - Another example of how limited natural gas delivery capacity can impact gas

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- 4 costs is in Southern California. Southern California capacity has been constrained due
- 5 to the derating of a major gas storage field Aliso Canyon and a short-term outage
- 6 of an interstate pipeline that delivers gas into Southern California. The California Public
- 7 Utilities Commission noted concern about the lack of gas capacity and the impact on
- 8 natural gas prices.
- 9 "4.1.2. Currently Aliso Canyon is Necessary to Protect Against Natural
  10 Gas and Electricity Price Spikes
- 11 Not only is Aliso Canyon needed for reliability currently, but it also has 12 serious impacts on natural gas and electricity prices. The analysis, data, 13 and real-world events show higher costs for utilities and customers 14 without Aliso Canyon. Aliso Canyon helps stabilize natural gas prices 15 and consequently utility bills for natural gas and electricity customers. 16 The 2023 – 2024 winter showed stable natural gas prices while other 17 parts of the country experienced relatively higher prices. Although the 18 causal connection between an increase in storage capacity at Aliso 19 Canyon and stable prices is not definitive, there is a pattern that more 20 storage capacity at Aliso Canyon has supported reliability and just and 21 reasonable rates."
- Exhibit KIC-14 shows the volatility in gas prices in Southern California after the Aliso Canyon authorized working gas storage was decreased by the California Public Utilities Commission from 89 Bcf to 24 Bcf in April 2016. The CPUC authorized Aliso Canyon working gas storage was slowly increased over time due to the finding by the Commission on the importance of the gas storage capacity value Aliso Canyon provided to the public via stabilizing gas prices and reliability as the regional gas
- capacity was constrained due to reduction in allowable working gas storage in Aliso
  Canyon. During the reduced use of storage, gas price basis differentials relative to
  Henry Hub expanded, particularly during constrained peak demand periods. The gas
- 31 price premium was further impacted after an outage at an interstate pipeline that

delivered gas to Southern California occurred in February 2021 and the outage
extended through February 2023. During peak demand periods, the basis cost of gas
further expanded due to the limited regional gas capacity. The combined loss of Aliso
Canyon full storage capacity and the El Paso pipeline delivery capacity into Southern
California caused several constrained periods that drove gas price significantly above
Henry Hub pricing.

### 7 Summary

### 8 Q PLEASE SUMMARIZE YOUR ADDITIONAL TESTIMONY.

9 А As outlined above, the importance of planning in advance to insure adequate firm gas 10 delivery capacity, adequate gas supply, and midstream collection infrastructure 11 capacity is critical in ensuring a reasonable cost of gas over the forecast period where 12 Evergy would be relying on gas fuel to operate Viola and McNew. The Commission 13 should not simply assume, as Evergy and Staff propose, that firm gas delivery will 14 become available to operate these two CCGTs. Rather a clear and definitive plan is 15 needed for firm delivery capacity, adequate amounts of gas supply, and adequate 16 collection infrastructure are available to provide natural gas to operate these facilities.

17 It is also clear that demand for natural gas may be causing the cost of natural 18 gas to escalate relative to other fuels available to operate generating facilities. Hence, 19 fuel diversity will continue to be a critical aspect of protecting Evergy's customers and 20 the public interest. The proposal to increase substantially the reliance on natural 21 gas-fired generation that minimizes the need for fuel diversification exposes Evergy's 22 customers to significant risks of gas cost increases, or worse, gas supply deficiencies.

## 1 Q DOES THIS CONCLUDE YOUR TESTIMONY?

2 A Yes, it does.

528306

## EVERGY ANNUAL REPORTS<sup>1</sup> Summary of Annual Fuel Costs in Cents Per Net kWh Delivered 2019 – 2024

	2019	2020	2021	2022	2023	2024
Coal	2.03	1.99	1.94	2.33	2.28	2.39
Wind, Hydroelectric, Landfill, Solar	2.36	2.31	2.06	2.20	2.16	1.82
Uranium	0.60	0.59	0.64	0.66	0.65	0.66
Natural Gas and Oil	2.91	2.91	11.72	9.26	3.59	3.25

2019				
	Use %	Cost		
Coal	50	\$2.03		
Wind, Hydroelectric,				
Landfill, Solar	27	2.36		
Uranium	18	0.60		
Natural Gas and Oil	5	2.91		
Total	100%	\$1.94		

2021				
	Use %	Cost		
Coal	50	1.94¢		
Wind, Hydroelectric,				
Landfill, Solar	30	2.06		
Uranium	16	0.64		
Natural Gas and Oil	4	11.72		
Total	100%	2.12		

2020				
	Use %	Cost		
Coal	46	\$1.99		
Wind, Hydroelectric,				
Landfill, Solar	29	2.31		
Uranium	21	0.59		
Natural Gas and Oil	4	2.91		
Total	100%	\$1.71		

2022				
	Use %	Cost		
Coal	48	2.33¢		
Wind, Hydroelectric,				
Landfill, Solar	31	2.20		
Uranium	16	0.66		
Natural Gas and Oil	5	9.26		
Total	100%	2.36		

<sup>&</sup>lt;sup>1</sup> Evergy, Inc. Form 10-K at 59 (Feb. 26, 2025); Evergy, Inc. Form 10-K at 12 (Feb. 28, 2024); Evergy, Inc. Form 10-K at 12 (Feb. 23, 2023); Evergy, Inc. Form 10-K at 12 (Feb. 24, 2022); Evergy, Inc. Form 10-K at 11 (Feb. 26, 2021); Evergy, Inc. Form 10-K at 11 (Mar. 2, 2020).

2023				
	Use %	Cost		
Coal	42	2.28¢		
Wind, Hydroelectric,				
Landfill, Solar	30	2.16		
Uranium	20	0.65		
Natural Gas and Oil	8	3.59		
Total	100%	2.03		

2024				
	Use %	Cost		
Coal	38	2.39¢		
Wind, Hydroelectric,				
Landfill, Solar	32	1.82		
Uranium	19	0.66		
Natural Gas and Oil	11	3.25		
Total	100%	1.97		

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For the fiscal year ended December 31, 2024

or

□ TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the transition period from \_\_\_\_\_to\_\_\_\_



Commission File Number	Exact name of registrant as specified in its charter, state of incorporation, address of principal executive offices and telephone number	I.R.S. Employer Identification Number
001-38515	EVERGY, INC.	82-2733395
	(a Missouri corporation) 1200 Main Street Kansas City, Missouri 64105 (816) 556-2200	
001-03523	EVERGY KANSAS CENTRAL, INC.	48-0290150
	(a Kansas corporation) 818 South Kansas Avenue Topeka, Kansas 66612 (785) 575-6300	
000-51873	EVERGY METRO, INC.	44-0308720
	(a Missouri corporation) 1200 Main Street Kansas City, Missouri 64105 (816) 556-2200	
	Securities registered pursuant to Section 12(b) of the Act:	No
Title of each class	Trading Symbol(s)	<u>Name of each exchange of which</u> registered
Evergy, Inc. common stock	EVRG	The Nasdaq Stock Market LLC

Securities registered pursuant to Section 12(g) of the Act: Evergy Kansas Central, Inc. Common Stock \$0.01 par value and Evergy Metro, Inc. Common Stock without par value.

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the reliability of the power grid, availability of transmission capacity, supportive energy policies and regulations, among other external factors. See "Cautionary Statements Regarding Certain Forward-Looking Information" and Part I, Item 1A. Risk Factors, for additional information.

Diversity of fuel supply has historically provided cost and reliability benefits. For example, because renewable generation can be intermittent, diversity of baseload generation fuel, including a mix of uranium, coal and natural gas, has helped to maintain a consistent availability of power. In addition, the Evergy Companies must prudently utilize the generation assets that regulators have allowed the Evergy Companies to include in rates. The Evergy Companies use a triennial IRP, a detailed analysis that estimates factors that influence the future supply and demand for electricity, to inform the manner in which they supply electricity. The IRP considers forecasts of future electricity demand, fuel prices, transmission improvements, new generating capacity, cost of environmental compliance, integration of renewables, energy storage, energy efficiency and demand response initiatives. The transition of Evergy's generation fleet over time is expected to result in ongoing reductions in emissions. Strategies that the Evergy Companies are pursuing to advance a responsible portfolio transition include:

- retiring older coal-fired generation or converting coal-fired generation resources to natural gas;
- · developing renewable energy and natural gas facilities;
- · grid investment and advancement;
- · collaborating with regulators to offer customers the opportunity to procure electricity produced with renewable resources; and
- investing in customer energy efficiency programs.

Since 2005, the Evergy Companies have added over 4,600 MWs of renewable generation, while retiring more than 2,400 MWs of fossil generation. See Item 2, Properties, for additional information regarding the Evergy Companies' renewable generation resources. The Evergy Companies are also committed to transparency. On its website, http://investors.evergy.com, Evergy provides quantitative and qualitative data regarding various environmental, social and governance matters, including information related to emissions, waste and water. The contents of the website, including reports and documents contained therein, are not incorporated into this filing.

See Note 15 to the consolidated financial statements for information regarding environmental matters.

#### Fuel

The fuel sources for Evergy's owned generation and power purchase agreements are coal, wind and other renewable sources, uranium and natural gas and oil. The actual 2024 fuel mix and fuel cost in cents per net kilowatt hour (kWh) delivered are outlined in the following table.

	Fuel Mix <sup>(a)</sup>	Fuel cost in cents per net kWh delivered	
Fuel	Actual 2024	Actual 2024	
Coal	38 %	2.39¢	
Wind, landfill gas and solar <sup>(b)</sup>	32	1.82	
Iranium	19	0.66	
Natural gas and oil	11	3.25	
Total	100 %	1.97	

(a) Fuel mix based on percent of net MWhs generated by owned resources and delivered under renewable power purchase agreements.

<sup>(b)</sup> Fuel cost in cents per net kWh delivered includes costs associated with renewable power purchase agreements.

#### Coal

During 2025, Evergy's generating units, including jointly-owned units, are projected to use approximately 15 million tons of coal. Evergy Kansas Central, Evergy Metro and Evergy Missouri West have entered into coal-purchase contracts with various suppliers in Wyoming's Powder River Basin (PRB), the nation's



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001-38515	EVERGY, INC.	82-2733395
	(a Missouri corporation) 1200 Main Street Kansas City, Missouri 64105 (816) 556-2200	
001-03523	EVERGY KANSAS CENTRAL, INC.	48-0290150
	(a Kansas corporation) 818 South Kansas Avenue Topeka, Kansas 66612 (785) 575-6300	
000-51873	EVERGY METRO, INC.	44-0308720
	(a Missouri corporation) 1200 Main Street Kansas City, Missouri 64105 (816) 556-2200	
	Securities registered pursuant to Section 12(b) of the Act:	
Title of each class	Trading Symbol(s)	Name of each exchange on which registered
Evergy, Inc. common stock	EVRG	The Nasdaq Stock Market LLC

Securities registered pursuant to Section 12(g) of the Act: Evergy Kansas Central, Inc. Common Stock \$0.01 par value and Evergy Metro, Inc. Common Stock without par value.

#### Fuel

The fuel sources for Evergy's owned generation and power purchase agreements are coal, wind and other renewable sources, uranium and natural gas and oil. The actual 2023 fuel mix and fuel cost in cents per net kilowatt hour (kWh) delivered are outlined in the following table.

	Fuel Mix <sup>(a)</sup>	Fuel cost in cents per net kWh delivered
Fuel	Actual 2023	Actual 2023
Coal	42 %	2.28¢
Wind, landfill gas and solar <sup>(b)</sup>	30	2.16
Uranium	20	0.65
Natural gas and oil	8	3.59
Total	100 %	2.03

(a) Fuel mix based on percent of net MWhs generated by owned resources and delivered under renewable power purchase agreements.

<sup>(b)</sup> Fuel cost in cents per net kWh delivered includes costs associated with renewable power purchase agreements.

#### Coal

During 2024, Evergy's generating units, including jointly-owned units, are projected to use approximately 13 million tons of coal. Evergy Kansas Central, Evergy Metro and Evergy Missouri West have entered into coal-purchase contracts with various suppliers in Wyoming's Powder River Basin (PRB), the nation's principal supply region of low-sulfur coal, and with local suppliers. The coal to be provided under these contracts is expected to satisfy approximately 65%, 35% and 35% of the projected coal requirements for 2024, 2025 and 2026, respectively. The remainder of the coal requirements is expected to be fulfilled through entering into additional contracts or spot market purchases.

Evergy Kansas Central, Evergy Metro and Evergy Missouri West have also entered into rail transportation contracts with various railroads to transport coal from the PRB and local suppliers to their generating units. The transportation services to be provided under these contracts are expected to satisfy almost all of the projected transportation requirements for 2024 and 2025 and 65% of the projected transportation requirements for 2026. The contract rates adjust for changes in railroad costs.

#### Nuclear Fuel

Evergy Kansas South and Evergy Metro each owns 47% of Wolf Creek, which is Evergy's only nuclear generating unit. Wolf Creek purchases uranium and has it processed for use as fuel in its reactor. This process involves conversion of uranium concentrates to uranium hexafluoride, enrichment of uranium hexafluoride and fabrication of nuclear fuel assemblies. The owners of Wolf Creek have on hand or under contract all the uranium, uranium enrichment and conversion services needed to operate Wolf Creek through the first quarter of 2030. The owners also have under contract all the uranium fabrication services required to operate Wolf Creek through 2045.

#### Natural Gas

Evergy purchases natural gas for use in its generating units primarily through spot market purchases. From time to time, Evergy also may enter into contracts, including the use of derivatives, in an effort to manage the cost of natural gas. For additional information about Evergy's exposure to commodity price risks, see Item 7A., Quantitative and Qualitative Disclosures About Market Risk.

Evergy Kansas Central, Evergy Metro and Evergy Missouri West maintain natural gas transportation arrangements with Southern Star Central Gas Pipeline, Inc. The Southern Star Central Gas Pipeline, Inc. arrangement expires based on the generating unit being served with expiration dates from 2025 to 2030.



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001-38515	EVERGY, INC.	82-2733395
	(a Missouri corporation) 1200 Main Street Kansas City, Missouri 64105 (816) 556-2200	
001-03523	EVERGY KANSAS CENTRAL, INC.	48-0290150
	(a Kansas corporation)	
	818 South Kansas Avenue	
	(785) 575-6300	
000-51873	EVERGY METRO, INC.	44-0308720
	(a Missouri corporation)	
	1200 Main Street	
	Kansas City, Missouri 64105 (816) 556-2200	
	Securities registered pursuant to Section 12(b) of the Act:	
Title of each class	Trading Symbol(s)	<u>Name of each exchange on which</u> registered
Evergy, Inc. common stock	EVRG	The Nasdaq Stock Market LLC

Securities registered pursuant to Section 12(g) of the Act: Evergy Kansas Central, Inc. Common Stock \$0.01 par value and Evergy Metro, Inc. Common Stock without par value.

#### Fuel

The fuel sources for Evergy's owned generation and power purchase agreements are coal, wind and other renewable sources, uranium and natural gas and oil. The actual 2022 fuel mix and fuel cost in cents per net kilowatt hour (kWh) delivered are outlined in the following table.

Enel	Fuel Mix <sup>(a)</sup>	Fuel cost in cents per net kWh delivered Actual 2022
	Actual 2022	
Coal	48 %	2.33¢
Wind hydroelectric landfill gas and solar <sup>(b)</sup>	31	2.20
Uranium	16	0.66
Natural gas and oil	5	9.26
Total	100 %	2.36

(4) Fuel mix based on percent of net MWhs generated by owned resources and delivered under renewable power purchase agreements.

(b) Fuel cost in cents per net kWh delivered includes costs associated with renewable power purchase agreements.

#### Coal

During 2023, Evergy's generating units, including jointly-owned units, are projected to use approximately 17 million tons of coal. Evergy Kansas Central, Evergy Metro and Evergy Missouri West have entered into coal-purchase contracts with various suppliers in Wyoming's Powder River Basin (PRB), the nation's principal supply region of low-sulfur coal, and with local suppliers. The coal to be provided under these contracts is expected to satisfy approximately 65%, 15% and 5% of the projected coal requirements for 2023, 2024 and 2025, respectively. The remainder of the coal requirements is expected to be fulfilled through entering into additional contracts or spot market purchases.

Evergy Kansas Central, Evergy Metro and Evergy Missouri West have also entered into rail transportation contracts with various railroads to transport coal from the PRB and local suppliers to their generating units. The transportation services to be provided under these contracts are expected to satisfy almost all of the projected transportation requirements for 2023, 2024 and 2025. The contract rates adjust for changes in railroad costs.

#### Nuclear Fuel

Evergy Kansas South and Evergy Metro each owns 47% of Wolf Creek, which is Evergy's only nuclear generating unit. Wolf Creek purchases uranium and has it processed for use as fuel in its reactor. This process involves conversion of uranium concentrates to uranium hexafluoride, enrichment of uranium hexafluoride and fabrication of nuclear fuel assemblies. The owners of Wolf Creek have on hand or under contract all the uranium, uranium enrichment and conversion services needed to operate Wolf Creek through the first quarter of 2030. The owners also have under contract all the uranium fabrication services required to operate Wolf Creek through 2045.

#### Natural Gas

Evergy purchases natural gas for use in its generating units primarily through spot market purchases. From time to time, Evergy also may enter into contracts, including the use of derivatives, in an effort to manage the cost of natural gas. For additional information about Evergy's exposure to commodity price risks, see Item 7A., Quantitative and Qualitative Disclosures About Market Risk.

Evergy Kansas Central, Evergy Metro and Evergy Missouri West maintain natural gas transportation arrangements with Southern Star Central Gas Pipeline, Inc. The Southern Star Central Gas Pipeline, Inc. arrangement expires based on the generating unit being served with expiration dates from 2023 to 2030.

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For the fiscal year ended December 31, 2021

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For the transition period from \_\_\_\_\_to\_\_\_\_



Commission File Number	Exact name of registrant as specified in its charter, state of incorporation, address of principal executive offices and telephone number	I.R.S. Employer Identification Number
001-38515	EVERGY, INC.	82-2733395
	(a Missouri corporation) 1200 Main Street Kansas City, Missouri 64105 (816) 556-2200	
001-03523	EVERGY KANSAS CENTRAL, INC.	48-0290150
	(a Kansas corporation)	
	818 South Kansas Avenue	
	Topeka, Kansas 66612 (785) 575-6300	
000-51873	EVERGY METRO, INC.	44-0308720
	(a Missouri corporation)	
	1200 Main Street	
	Kansas City, Missouri 64105 (816) 556-2200	
	Securities registered pursuant to Section 12(b) of the Act:	
Title of each class	Trading Symbol(s)	<u>Name of each exchange on which</u> <u>registered</u>
Evergy, Inc. common stock	EVRG	New York Stock Exchange

Securities registered pursuant to Section 12(g) of the Act: Evergy Kansas Central, Inc. Common Stock \$0.01 par value and Evergy Metro, Inc. Common Stock without par value.

new generating capacity, cost of environmental compliance, integration of renewables, energy storage, energy efficiency and demand response initiatives. Strategies that the Evergy Companies are pursuing to reduce emissions include:

- retiring fossil fuel generation;
- developing renewable energy facilities;
- collaborating with regulators to offer customers the opportunity to procure electricity produced with renewable resources; and
- investing in customer energy efficiency programs.

Since 2005, the Evergy Companies have added over 4,400 MWs of renewable generation, while retiring more than 2,400 MWs of fossil generation. See Item 2, Properties, for additional information regarding the Evergy Companies' renewable generation resources. The Evergy Companies are also committed to transparency. On its website, http://investors.evergy.com, Evergy provides quantitative and qualitative data regarding various environmental, social and governance matters, including information related to emissions, waste and water. The contents of the website, including reports and documents contained therein, are not incorporated into this filing.

See Note 14 to the consolidated financial statements for information regarding environmental matters.

#### Fuel

The fuel sources for Evergy's owned generation and power purchase agreements are coal, wind and other renewable sources, uranium and natural gas and oil. The actual 2021 fuel mix and fuel cost in cents per net kilowatt hour (kWh) delivered are outlined in the following table.

	Fuel Mix <sup>(a)</sup>	Fuel cost in cents per net kWh delivered <sup>(b)</sup> Actual 2021
	Actual 2021	
Fuel	50%	1.94¢
Coal Mand budgeslagtrig landfill gas and solar	30	2.06
Wind, hydroelectric, falidini gas and solar	16	0.64
Natural gas and oil	4	11.72
Total	100 %	2.12

(\*) Fuel mix based on percent of net MWhs generated by owned resources and delivered under renewable power purchase agreements

(b) Fuel cost in cents per net kWh delivered includes costs associated with renewable power purchase agreements.

#### Coal

During 2022, Evergy's generating units, including jointly-owned units, are projected to use approximately 19 million tons of coal. Evergy Kansas Central, Evergy Metro and Evergy Missouri West have entered into coal-purchase contracts with various suppliers in Wyoming's Powder River Basin (PRB), the nation's principal supply region of low-sulfur coal, and with local suppliers. The coal to be provided under these contracts is expected to satisfy approximately 85% of the projected coal requirements for 2022 and approximately 10% for each of 2023 and 2024. The remainder of the coal requirements is expected to be fulfilled through entering into additional contracts or spot market purchases.

Evergy Kansas Central, Evergy Metro and Evergy Missouri West have also entered into rail transportation contracts with various railroads to transport coal from the PRB and local suppliers to their generating units. The transportation services to be provided under these contracts are expected to satisfy almost all of the projected transportation requirements for 2022, 2023 and 2024. The contract rates adjust for changes in railroad costs.



UNITED STATES SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

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 $\boxtimes$  ANNUAL REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the fiscal year ended December 31, 2020

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For the transition period from \_\_\_\_\_to\_\_\_\_



Commission File Number	Exact name of registrant as specified in its charter, state of incorporation, address of principal executive offices and telephone number	I.R.S. Employer Identification Number
001-38515	EVERGY, INC.	82-2733395
	(a Missouri corporation) 1200 Main Street Kansas City, Missouri 64105 (816) 556-2200	
001-03523	EVERGY KANSAS CENTRAL, INC.	48-0290150
	(a Kansas corporation) 818 South Kansas Avenue Topeka, Kansas 66612 (785) 575-6300	
000-51873	EVERGY METRO, INC.	44-0308720
	(a Missouri corporation) 1200 Main Street Kansas City, Missouri 64105 (816) 556-2200	
	Securities registered pursuant to Section 12(b) of the Act:	
Title of each class	Trading Symbol(s)	Name of each exchange on which registered
Evergy, Inc. common stock	EVRG	New York Stock Exchange

Securities registered pursuant to Section 12(g) of the Act: Evergy Kansas Central, Inc. Common Stock \$0.01 par value and Evergy Metro, Inc. Common Stock without par value.

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efficiency and demand response initiatives. Strategies that the Evergy Companies are pursuing to reduce emissions include:

- retiring fossil fuel generation;
- developing renewable energy facilities; .
- collaborating with regulators to offer customers the opportunity to procure electricity produced with renewable resources; and ٠
- investing in customer energy efficiency programs.

Since 2005, the Evergy Companies have added over 4,400 MWs of renewables, while retiring more than 2,400 MWs of fossil generation. The Evergy Companies are also committed to transparency. On its website, www.evergy.com, Evergy provides quantitative and qualitative data regarding various environmental, social and governance matters, including information related to emissions, waste and water. The contents of the website, including reports and documents contained therein, are not incorporated into this filing.

See Note 15 to the consolidated financial statements for information regarding environmental matters.

#### Fuel

The fuel sources for Evergy's owned generation and power purchase agreements are coal, wind and other renewable sources, uranium and natural gas and oil. The actual 2020 fuel mix and fuel cost in cents per net kilowatt hour (kWh) delivered are outlined in the following table.

	Fuel Mix <sup>(a)</sup>	Fuel cost in cents per net kWh delivered <sup>(b)</sup>	
Enel	Actual 2020	Actual 2020	
Coal	46 %	\$1.99	
Wind bydroelectric landfill gas and solar	29	2.31	
Iranium	21	0.59	
Natural gas and oil	4	2.91	
Total	100 %	\$1.71	

(a) Fuel mix based on percent of net MWhs generated by owned resources and delivered under renewable power purchase agreements.

<sup>(b)</sup> Fuel cost in cents per net kWh delivered includes costs associated with renewable power purchase agreements

#### Coal

During 2021, Evergy's generating units, including jointly-owned units, are projected to use approximately 18 million tons of coal. Evergy Kansas Central, Evergy Metro and Evergy Missouri West have entered into coal-purchase contracts with various suppliers in Wyoming's Powder River Basin (PRB), the nation's principal supply region of low-sulfur coal, and with local suppliers. The coal to be provided under these contracts is expected to satisfy approximately 60% of the projected coal requirements for 2021 and approximately 10% for 2022. The remainder of the coal requirements is expected to be fulfilled through entering into additional contracts or spot market purchases.

Evergy Kansas Central, Evergy Metro and Evergy Missouri West have also entered into rail transportation contracts with various railroads to transport coal from the PRB and local suppliers to their generating units. The transportation services to be provided under these contracts are expected to satisfy almost all of the projected transportation requirements for 2021 and approximately 80% for 2022. The contract rates adjust for changes in railroad costs.

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## ANNUAL REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the fiscal year ended December 31, 2019

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□ TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the transition period from \_\_\_\_\_to\_\_\_\_



Commission File Number	Exact name of registrant as specified in its charter, state of incorporation, address of principal executive offices and telephone number	I.R.S. Employer Identification Number
001-38515	EVERGY, INC. (a Missouri corporation) 1200 Main Street Kansas City, Missouri 64105 (816) 556-2200	82-2733395
001-03523	EVERGY KANSAS CENTRAL, INC. (formerly Westar Energy, Inc.) (a Kansas corporation) 818 South Kansas Avenue Topeka, Kansas 66612 (785) 575-6300	48-0290150
000-51873	EVERGY METRO, INC. (formerly Kansas City Power & Light Company) (a Missouri corporation) 1200 Main Street Kansas City, Missouri 64105 (816) 556-2200	44-0308720
<u>Title of each class</u> Evergy, Inc. common stock	Securities registered pursuant to Section 12(b) of the Act: <u>Trading Symbol(s)</u> EVRG	<u>Name of each exchange on which</u> <u>registered</u> New York Stock Exchange

Securities registered pursuant to Section 12(g) of the Act: Evergy Kansas Central, Inc. Common Stock \$0.01 par value and Evergy Metro, Inc. Common Stock without par value.

demand for electricity, to inform the manner in which they supply electricity. The integrated resource plan considers forecasts of future electricity demand, fuel prices, transmission improvements, new generating capacity, integration of renewables, energy storage, energy efficiency and demand response initiatives. Strategies that the Evergy Companies have pursued include:

- retiring fossil fuel generation;
- developing renewable energy facilities;
- collaborating with regulators to offer customers the opportunity to procure electricity produced with renewable resources; and
- investing in customer energy efficiency programs.

Since 2005, the Evergy Companies have added over 3,500 megawatts of renewables, while retiring more than 2,400 megawatts of fossil generation. The transition of their generation fleet has allowed the Evergy Companies to reduce carbon emissions by almost 40% since 2005. The Evergy Companies are also committed to transparency. On its website, www.evergy.com, Evergy provides quantitative and qualitative data regarding various environmental, social and governance matters, including information related to emissions, waste and water. The contents of the website and report are not incorporated into this filing.

See Note 15 to the consolidated financial statements for information regarding environmental matters.

#### Fuel

The fuel sources for Evergy's owned generation and purchased power agreements are coal, wind and other renewable sources, uranium and natural gas and oil. The actual 2019 fuel mix and fuel cost in cents per net kilowatt hour (kWh) delivered are outlined in the following table.

Eval	Fuel Mix <sup>(a)</sup>	Fuel cost in cents per net kWh delivered <sup>(b)</sup> Actual 2019
	Actual 2019	
Coal	50 %	\$2.03
Wind, hydroelectric, landfill gas and solar	27	2.36
Jranium	18	0.60
Natural gas and oil	5	2.91
Total	100 %	\$1.94

(a) Fuel mix based on percent of net MWhs generated by owned resources and delivered under renewable purchased power agreements.

(b) Fuel cost in cents per net kWh delivered includes purchased power costs associated with renewable purchased power agreements.

#### Coal

During 2020, Evergy's generating units, including jointly-owned units, are projected to use approximately 17 million tons of coal. Evergy Kansas Central, Evergy Metro and Evergy Missouri West have entered into coal-purchase contracts with various suppliers in Wyoming's Powder River Basin (PRB), the nation's principal supply region of low-sulfur coal, and with local suppliers. The coal to be provided under these contracts is expected to satisfy approximately 80% of the projected coal requirements for 2020 and approximately 10% for 2021. The remainder of the coal requirements is expected to be fulfilled through entering into additional contracts or spot market purchases.

Evergy Kansas Central, Evergy Metro and Evergy Missouri West have also entered into rail transportation contracts with various railroads to transport coal from the PRB and local suppliers to their generating units. The transportation services to be provided under these contracts are expected to satisfy almost all of the projected transportation requirements for 2020 and approximately 75% for 2021. The contract rates adjust for changes in railroad costs.

# Future Energy & Resource Needs Study (FERNS)

Johannes Pfeifenberger Kate Peters **Paige Vincent** Hazel Ethier Sam Willett

Southwest Power Pool

**FEBRUARY 2025** 





#### Data Element **Description and Source Notes** Six internal energy zones consistent with 2023 LOLE Study zones (North, North Central, Central **Energy Zones** West, Central East, Southwest, and Southeast) Transmission Interface limits between each internal zone and the rest of SPP consistent with 2023 LOLE study **Topology and** limits (ATC and FCITC); the simulations will optimally expand the transmission limits based on cost assumptions developed from SPP transmission cost estimates and MISO forward looking costs Limits Fixed import and export limits with neighboring regions provided by SPP staff. Hourly energy Imports and transfers based on simplified modeling of external zones to capture regional variations in load, Exports renewables (over the same 15 weather years and cold snaps) and associated diversity benefits Low, moderate, and high scenarios developed by Evolved Energy Research (EER) for SPP FERNS Load Growth Demand Electrification that represents a range of electrification scenarios and 15 weather years **Hourly Load** Hourly shapes developed by EER for SPP FERNS Demand Electrification that vary by (weather) year, SPP zone, end-use, and scenario for 2023, 2025, 2029, 2034, 2040, 2050 Shapes **Existing Generator** SPP data (2025 ITP) for existing units' capacities, heat rates, and additional operational Data characteristics by region Scheduled SPP data (2025 ITP) and Interconnection Queue studies to identify resource decisions already Additions/Retiremade (as model input) by capacity, location, date. (Necessary additional future generation ments (near term) additions and retirement decisions are optimized by the model) Capital, fixed, and variable cost projections for new generators by resource type and SPP zone Cost Trajectory for from SPP IHS forecasts; zonal costs and intra-zonal transmission adders as function of resource New Generation availability and transmission headroom/cost by zone informed by SPP interconnection studies Hourly renewable profiles for all SPP zones and external regions, for all 15 weather years available Hourly Renewable in the load dataset, based on Imperial College London ("Renewables.Ninja") dataset and Generation benchmarked to National Renewable Energy Laboratory (NREL) regional values Natural gas, coal, and oil prices (by SPP zone) from SPP IHS forecasts and 2024 and 2025 ITP; **Fuel Prices** additional fuel types supplemented from other public sources like the NREL FERNS uses an hourly approach to determine resource adequacy needs (based on hourly loads, operating reserves, renewable profiles, and generation outages associated with 15 weather years and cold snaps). FERNS defines RA requirements as hourly load plus a 5% capacity (operating **Reserve Margin** and Resource reserve) margin, which needs to be maintained across the full range of challenging system conditions (such as heat waves, cold snaps, renewable droughts, and high generation outages). A Adequacy Framework \$50,000/MWh "resource adequacy violation charge" represents tradeoffs between adding generation capacity or allowing for load shedding (or operating reserve depletion) approximately once in ten years during the most challenging hours across all weather years **Tax Credits and** IRA-based PTC for solar and wind (and ITC for battery storage) or equivalent (state or corporate) Clean Energy support, assumed for the entire study horizon in Scenarios B1, B2, and B3. Assumed eliminated for Scenarios A1 and A2. No other clean energy policies are assumed for the SPP footprint Policies

### TABLE 2: SUMMARY OF KEY FERNS INPUTS AND DATA SOURCES



Between 2040 and 2050, an increasing amount of solar capacity is added in all Scenarios (particularly B1, B2, and B3)—and paired with battery storage to maintain reliability. As also shown in Figure 6, the SPP region is projected to rely on shorter (2–4 hour) duration storage (paired with less solar capacity) in the "A" scenarios and longer (8+ hour) duration storage in the "B" scenarios. Figure 6 further demonstrates that installed wind generation capacity is very similar across the scenarios, suggesting SPP will reach wind saturation regardless of federal renewables support. Appendix 2 provides additional detail for these generation-related simulation results.

The significant projected solar generation development during the 2040s (with very little new wind generation) is in part driven by SPP cost assumptions. As documented in Appendix 1, SPP's generation technology cost assumptions are on the low end for both solar and storage (compared to publicly available cost projections), but on the high end for wind generation. In combination with SPP's relatively high gas price projections, these assumptions will be a significant determinant of the FERNS optimal resource mix results. For example, lower gas prices and higher solar costs would reduce the share of solar and storage but increase reliance on natural gas and wind generation. Sensitivity analyses would be necessary to understand the extent of the trade-off between cost assumptions and optimal resource mix.

Future Energy & Resource Needs Study (FERNS)

### APPENDIX 1: GENERATION AND TRANSMISSION CAPACITY COSTS

## Generation Technology Costs (and Benchmarking)

FERNS inputs are based on SPP 2025 ITP planning resource costs.

The charts also benchmark SPP costs against NREL Annual Technology Baseline S (ATB) costs for the "moderate scenario"

- SPP costs are a lower for CCs and CTs than ATB moderate estimates
- Solar costs are close to ATB estimates, SPP wind costs are higher, and storage costs are lower than ATB moderate estimates. These assumptions will in part drive the simulated optimal resource mix.

Sensitivity analyses around cost inputs would be necessary to understand the extent of the tradeoff between assumed costs and optimal resource mix. For example, lower gas prices and higher solar costs would reduce the share of solar and storage, but increase reliance on natural gas and wind generation.



Note: Vertical axis scales differ across figures. Grey shading for NG CCs is the range between the ATB conservative brattle.com | 28 and aggressive scenarios. Dashed lines reference moderate ATB costs. ATB CT costs are the same for all scenarios.

## APPENDIX 1: FUEL PRICE PROJECTIONS Natural Gas Prices

- Natural gas prices for internal and external zones vary by region.
- Modeled zones are mapped to gas hubs in SPP provided ITP 2025 forecasts based on gas units' Powerflow Area Numbers with regional basis differentials used to adjust Henry Hub forecasts.
- Prices are adjusted using an annual inflation rate of 2.6% (price spike during winter storm period not shown in chart).
- SPP forecasted ITP 2025 prices are generally higher than some other national forecasts (NREL, EIA's AEO).
- The impacts of lower gas price projections would need to be studied in further sensitivity work.



## Gas Price Hub Mapping

Zones	Gas Price Hubs
North	NG Dakotas
North Central	NG Nebraska
Central West	NG KSMO
Central East	NG KSMO
Southwest	NG West SPP
Southeast	NG Oklahoma

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## **APPENDIX 1: FUEL PRICE PROJECTIONS**

## **Coal Prices**

- Coal prices for internal and external zones vary by region.
- Modeled zones are mapped to coal price basins in SPP provided data consistent with ITP 2025 assumptions.
- Prices are adjusted using an annual inflation rate of 2.6%.
- Impacts of EPA Rule 111 are not modeled in FERNS.



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### **CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of May 2025, the above and foregoing was

electronically filed with the Kansas Corporation Commission and that one copy was delivered

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