PUBLIC VERSION

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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

COMMENTS OF KANSAS ELECTRIC POWER COOPERATIVE, INC. ON THE EVERGY KANSAS CENTRAL 2025 ANNUAL UPDATE

COMES NOW Kansas Electric Power Cooperative, Inc. ("KEPCo") and submits these comments on the *Evergy Kansas Central 2025 Annual Update* filed on May 1, 2025 ("2025 Annual Update"), by Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("Evergy Kansas Metro"), and Evergy Kansas Central, Inc. and its subsidiary, Evergy Kansas South, Inc. (collectively, "Evergy KC") (together, Evergy Kansas Metro and Evergy KC are referred to as "Evergy"). KEPCo, an intervenor in Docket 19-KCPE-096-CPL,[1] entered an appearance in this docket on January 8, 2024,[2] and, accordingly, was automatically granted intervention in this Docket.[3]

I. Introduction

1. KEPCo is engaged in the business of a generation and transmission cooperative electric supplier providing power and energy to 17 member distribution cooperatives ("Members") in the state of Kansas. KEPCo's Members collectively serve over 75,000 retail consumer-members in the eastern two-thirds of Kansas, which equates to nearly 200,000 Kansans.

[1] Order Granting Intervention to Kansas Electric Power Cooperative, Inc., Docket No. 19-KCPE-096-CPL (Sept. 15, 2020).

[2] Entry of Appearance of Kansas Electric Power Cooperative, Inc., Docket No. 24-EKCE-387-CPL (Jan. 8, 2024).

[3] Order Opening Docket, Docket No. 24-EKCE-387-CPL, at Ordering Para. B (Dec. 14, 2023).

2. KEPCo is a significant wholesale generation and transmission customer of Evergy. Therefore, KEPCo has a unique interest in Evergy's resource planning and Evergy's resource choices will impact the affordability and reliability of KEPCo's service.

3. Pursuant to the IRP Framework Order, stakeholders are permitted to submit comments on each annual update filed between triennial compliance filings.[4] On June 5, 2025, the State Corporation Commission of the State of Kansas ("Commission") issued an order granting a motion by Commission Staff extending the time to file comments to July 2, 2025.[5]

4. Evergy's 2025 Annual Update continues a path of progress since the initial 2021 triennial compliance filing.[6] KEPCo reiterates its appreciation for Evergy's responsiveness to several of the concerns raised in response to earlier iterations, which have led to prudent decisions to delay retirements of thermal generating facilities under its preferred plan, and to embrace the conversion from coal to natural gas fuel sources for each of the Lawrence Energy Center ("Lawrence") Units 4 and 5, and Jeffrey Energy Center ("Jeffrey") Unit 2. Each of these developments should be credited to the input received from stakeholders in this docket and Evergy's willingness to make adjustments in light of changing market conditions.

5. However, with the Jeffrey Unit 3 retirement decision fast approaching, and dramatic policy shifts occurring at the federal level, KEPCo believes it is critical that Evergy evaluate the full range of options regarding this resource, to fully evaluate the cost considerations that will result from its decisions in implementing its preferred plan moving forward. This

[4] Order Adopting Integrated Resource Plan and Capital Plan Framework, Docket No. 19-KCPE-096-CPL, Att. A at 10 (Feb. 6, 2020) ("IRP Framework Order").

[5] Order Granting Staff's Motion for Extension to File Integrated Resource Plan Comments by July 2, 2025, Docket No. 24-EKCE-387-CPL (June 5, 2025).

[6] Evergy Kansas Central and Evergy Metro 2021 Integrated Resource Plan, Docket No. 19-KCPE-096-CPL (filed May 28, 2021 and revised June 3, 2021) ("2021 Triennial IRP").

analysis should fully consider: (1) the significant uncertainty concerning the scale and pace of new data centers and large loads entering the grid and the demands these loads will bring to both the electric grid and electric generation supply chains, (2) shifting federal policy that emphasizes preservation of firm, dispatchable thermal generating resources and a reversal of regulatory impediments, and (3) the challenges seen in the execution of developing new resources and the timing and cost risks thereof. Each of these factors raises serious questions regarding the efficacy of any strategy to retire firm, dispatchable thermal resources in the near-term, the consequences of which could be severe to reliability and electricity costs in the region.

II. Analysis

A. The 2025 Annual Update Fails to Test Alternatives to Retiring Jeffrey Unit 3 Despite Changed Market Conditions that Have Caused Evergy to Develop Retirement Alternatives for Other Previously Planned Retirements.

6. Evergy's plans for retirement of the Jeffrey Units, particularly, Units 2 and 3, have long been a key contingency driving the analysis regarding Evergy's portfolio strategy. Although Evergy has acknowledged the critical importance of these large, firm and dispatchable units with respect to its planning, Evergy has taken minimal efforts to transparently evaluate the comparative costs associated with retiring these units in 2030, versus continued operation until 2039 and beyond. Evergy has long held the belief that costly environmental retrofits would be a near certainty for these units, and the continued absence of meaningful testing of this contingency is evidence of this belief. Yet, Evergy has already been proven incorrect regarding the need for baghouse retrofits on these units, and recent federal policy changes strongly suggest a similar outcome for selective catalytic reduction technologies, which are also unlikely to be needed due to deregulation. In order to retire Jeffrey Unit 3 in 2030, Evergy will need to commit to a decision in the very near term, and it is now imperative that Evergy fully evaluate these contingent costs, to support an informed decision regarding the prudence of retirement.

7. One need only look at the evolution of Evergy's preferred plan since the inaugural 2021 Triennial IRP to see that retirement decisions have not progressed as expected. In Evergy's initial preferred plan, Evergy planned to retire both Lawrence Units 4 and 5 by the end of 2023, and Jeffrey Unit 3 in 2030.[7] Due to the expensive retrofits contemplated for the Jeffrey Units, Jeffrey Unit 2 was also identified for retirement in 2030 in the 2022 Annual Update.[8] Today, both Lawrence Units remain in operation, and Evergy now plans to convert both units, as well as Jeffrey Unit 2, to natural gas-powered operation.[9]

8. The reasons for these changes in the preferred plan are clear, Evergy has experienced significant challenges in building and acquiring new resources, largely due to a lack of mature projects available on the market. Moreover, costs across all new resource types have increased dramatically since Evergy's initial cost projections, due to inflation, tariffs, and supply chain constraints. It is only as a result of these changing market conditions, however, that Evergy has had little choice but to consider alternatives to retirement for these units. These alternatives, while preferable to retirement, have been considered only after a reactive evaluation in the wake of significantly changed market conditions. This is not the proactive approach that the IRP proceeding is intended to provide.

9. Jeffrey Unit 3 stands as the lone resource for which Evergy has not deviated from its retirement plan, and there is no indication that Evergy has meaningfully evaluated alternatives to retirement, despite these markedly changed conditions. Instead, Evergy has hard-coded the

[7] 2021 Triennial IRP at 107.

[8] Evergy Kansas Central and Evergy Metro 2022 Annual Update, Docket No. 19-KCPE-096-CPL, at 50 (filed June 10, 2022) ("2022 Annual Update").

[9] 2025 Annual Update at 3, 54.

Jeffrey Unit 3 retirement date into its planning as a "base planning assumption."[10] This approach is not proactive, and it does not provide a transparent comparison of costs in light of the evident changed market dynamics that has caused Evergy to deviate from its planned retirements of both Lawrence Units and Jeffrey Unit 2.

10. The supply-side is not the only challenge that Evergy faces, challenges are on the horizon regarding its demand expectations as well. Evergy has stated there is a potential new load pipeline of "approximately 6 gigawatts"[11] within its territories, signaling a need for even more resources, and this new load could come at a pace faster than Evergy can feasibly deploy new generation. When asked in discovery whether Evergy has considered this anticipated load growth as part of its retirement decision for Jeffrey Unit 3, Evergy responded that it "seeks to maintain as much flexibility and optionality as possible with its coal fleet," and that for Jeffrey Unit 3, "Evergy does not have a specific date identified and is planning to maintain optionality as long as possible."[12] These statements are inconsistent with the 2025 Annual Update. No optionality for this retirement date has been considered in the 2025 Annual Update, as Evergy has not considered or tested any alternatives to retiring Jeffrey Unit 3 in 2030.

11. In this supply-constrained environment with extreme load growth projections, the prudent path is to leverage existing resources to their fullest potential, and retirement should be a last resort.

[10] Evergy Response to KEPCo 3-03 at 1, subresponse (a) (June 24, 2025) ("KEPCo Data Request 3-03 Response"), attached as Attachment A.

[11] Direct Testimony of Jason Humphrey on behalf of Evergy Metro, Inc., Evergy Kansas Central, Inc. and Evergy Kansas South, Inc., Docket NO. 25-EKCE-207-PRE, at 20:1 (November 6, 2024) ("Humphrey Direct"), relevant excerpts attached as Attachment B.

[12] KEPCo Data Request 3-03 Response at 2, subresponses (c) and (d).

B. New Build Combined Cycle and Combustion Turbine Costs Have Increased Significantly and This Trend is Set to Continue in a Supply-Constrained Demand-Growth Market.

12. Evergy's modeled costs of replacement gas-fired technologies such as combined cycle and turbines have [redacted] since only last year's study,[13] greatly increasing the estimated costs to replace these units. These costs are based on Evergy's quoted prices for the new Viola and McNew combined cycle generating stations that are the subject of the predetermination petition.[14] The actual costs of construction, however, could rise even higher once construction is actually underway. Costs for future projects could also continue to rise as competition for new resources by large data centers further constrains the supply chain.

13. For future projects, Evergy has acknowledged the strong risk "of further inflation in a new-build environment with significant demand for electricity and new generation throughout the United States."[15] Yet these anticipated price increases are not reflected in Evergy's IRP modeling assumptions, aside from the 25% +/- range in construction costs, that are tested merely as a critical uncertainty factor, and is applied uniformly across resource types.[16] While Evergy highlights this risk as support for its claim that "in the current environment, deferral of resource additions is not a viable option,"[17] this risk likewise demands a reevaluation of Evergy's plans to retire existing units, which will become increasingly valuable in a supply-constrained market.

[13] 2025 Annual Update at 37-38 and Figures 18 and 19.

[14] *Id.* at 37 (referring to Docket No. 25-EKCE-207-PRE).

[15] Humphrey Direct at 19:21-23.

[16] 2025 Annual Update at 32.

[17] Humphrey Direct at 20:6.

C. Recent Executive Orders Signal a Dramatic Shift in Federal Policy Toward Deregulation and Preservation of Firm, Dispatchable Energy Resources.

14. Recent Executive Orders under the current federal administration signal a reversal in federal policy, emphasizing removal of regulatory impediments and preservation and growth of thermal generating resources. Plans to retire and replace firm, dispatchable thermal resources, such as Jeffrey Unit 3, are contrary to this clear shift in federal policy, and this shift greatly undermines Evergy's modeling assumptions, particularly in relation to Evergy's anticipated high costs of carbon, presumed need for costly environmental retrofits, and pessimism regarding the viability of coal-fired generating resources going forward.

15. On February 6, 2025, the current administration issued Executive Order 14192, Unleashing Prosperity Through Deregulation,[18] requiring agencies to identify at least 10 existing regulations to be repealed for each new proposed regulation.[19] Following that order, the U.S. Environmental Protection Agency has publicly announced its intention to "restructure" the Regional Haze Program among many other deregulatory initiatives, such as reconsideration of the Clean Power Plan and Mercury and Air Toxics Standards,[20] seriously undermining Evergy's assumption that SCR retrofits would be required at any of the Jeffrey Units.[21] This alone would result in savings of hundreds of millions of dollars from Evergy's capital cost projections for continued operation of Jeffrey Unit 3 beyond 2030, and this contingency is completely unaccounted for in the 2025 Annual Update. Indeed, the avoidance of these exorbitant capital

[18] 90 Fed. Reg. 9065 (Feb. 6, 2025), available at https://www.govinfo.gov/app/details/FR-2025-02-06/2025-02345.

[19] *Id.* at Sec. 2.

[20] EPA Launches Biggest Deregulatory Action in U.S. History (published Mar. 12, 2025), *available at*: https://www.epa.gov/newsreleases/epa-launches-biggest-deregulatory-action-us-history.

[21] 2025 Annual Update at 44.

expenditures is one of the primary benefits that Evergy has cited with respect to its decision to convert Jeffrey Unit 2 to gas operation.[22]

16. In the 2021 Triennial IRP proceedings, Evergy disclosed that it was expecting substantial and costly baghouse and SCR retrofits to the Jeffrey Units to meet anticipated future environmental regulatory obligations.[23] In the 2022 Annual Update, Evergy identified these retrofits as a key contingency that would be determinative as to whether Evergy will retire Jeffrey Unit 2 or a different thermal generating resource in or around 2030.[24] Evergy did not address Jeffrey Unit 3 as a contingency in the 2022 Annual Update, or any of its IRP reports since then.

17. As KEPCo has noted previously, Evergy has provided only limited analysis of a difference in Net Present Value of Revenue Requirements ("NPVRR") attributable to the Jeffrey retrofits of $514 million.[25] In the 2023 Integrated Resource Plan Annual Update,[26] Evergy determined that if SCR retrofits were deemed unnecessary, continued operation of all of the Jeffrey Units through 2039 would be the least cost portfolio.[27]

18. Since the 2023 Annual Update, Evergy has, inexplicably, abandoned any consideration of the contingent nature of costly SCR retrofits, or alternatives to retirement of

[22] *See id.* at 58.

[23] Report of Kansas Electric Power Cooperative, Inc. on the Evergy Kansas Central and Evergy Metro 2021 Integrated Resource Plan at ¶ 31 and Att. H (filed Oct. 25, 2021).

[24] 2022 Annual Update at 50.

[25] Comments of Kansas Electric Power Cooperative, Inc. on the Evergy Kansas Central and Evergy Metro 2022 Annual Update, Docket No. 19-KCPE-096-CPL, at ¶ 26 (filed Aug. 29, 2022) (citing 2022 Annual Update at 69).

[26] Evergy Kansas Central and Evergy Metro 2023 Annual Update, Docket No, 19-KCPE-096-CPL (filed June 15, 2023 and revised June 27, 2023 and July 5, 2023) ("2023 Annual Update").

[27] Comments of Kansas Electric Power Cooperative, Inc. on the Evergy Kansas Central and Evergy Metro 2023 Annual Update, Docket No. 19-KCPE-096-CPL, at ¶¶ 10-11 (filed Aug. 31, 2023) (citing 2023 Annual Update at 146).

Jeffrey Unit 3 in 2030. This absence is even more troubling given that recent market developments would undoubtedly cause the relative cost of such retirement to be even greater than the costs demonstrated in Evergy's prior, limited analysis of this issue, since the costs of replacement resources have multiplied.

19. Evergy's heavily-weighted assumptions regarding carbon emission costs have also proven thus far to be greatly exaggerated, inflating the modeled costs of continued operation of its thermal generating fleet. Other executive orders stress the need to preserve existing firm, dispatchable thermal generating resources to meet anticipated demand growth. The current administration has declared an energy emergency due to the expected influx of large data center loads across the nation, in recognition that these new loads will require tremendous volumes of firm, dispatchable power that is available all hours of the day, and all seasons, placing enormous stress on the grid.[28] The current administration has also placed a renewed emphasis on coal-fired generation, and deregulation to remove impediments to the continued operation of these resources.[29] Thus, current federal policy confirms that the status quo, and perhaps even reduced costs associated with such emissions, are a near certainty under the current administration, and it is increasingly unlikely that affirmative actions to implement a cost of carbon as opposed to a clean energy incentive would be actionable at any point in the foreseeable future. Indeed, even the existing clean energy incentives at the federal level are in jeopardy as part of the current

[28] Declaring a National Energy Emergency, Executive Order 14156, 90 Fed. Reg. 8433 (Jan. 29, 2025) (streamlining approvals for energy resources including coal and natural gas, and electric generation therefrom), *available at* https://www.govinfo.gov/app/details/FR-2025-01-29/2025-02003.

[29] Reinvigorating America's Beautiful Clean Coal Industry, Executive Order 14261, 90 Fed. Reg. 15517 (Apr. 8, 2025) (declaring a national priority to support the domestic coal industry by removing federal regulatory barriers that undermine coal production, and encouraging the utilization of coal to meet growing domestic energy demands), *available at* https://www.govinfo.gov/app/details/FR-2025-04-14/2025-06380.

budget reconciliation process, which would further increase the cost of new renewable resources and batteries.[30] Thus, any expectation that a cost of carbon will come to pass is highly speculative, and Evergy's weighting of this probability is not realistic. These inflated carbon costs greatly skew Evergy's analysis in favor of retirement of thermal coal-powered resources, without providing true transparency into the relative costs of continued operation compared to new resource builds.

D. Evergy Should Not Commit to Retirement Decisions Until Replacement Resources Have Been Successfully Completed, with an Adequate Margin of Safety.

20. In its report commenting on Evergy's 2024 Triennial Integrated Resource Plan,[31] KEPCo detailed the challenges Evergy has had in developing new resources, particularly solar and wind.[32] Evergy continues to encounter unanticipated delays and rising costs, which have, as a consequence, required Evergy to defer retirement of the Lawrence Units 4 and 5, and Jeffrey Unit 2, converting all three to gas operation. There is no reason to believe these challenges will subside in the near term, and more likely, they will only get worse. Accordingly, KEPCo strongly recommends that no generating facilities be retired until replacement facilities that support such retirement have achieved commercial operation.

21. While KEPCo fully appreciates the complexities, risks, and challenges of project development in the current market environment, as well as the benefits of hindsight, it is for these same reasons that Evergy should not undertake a premature and irreversible commitment to

[30] *See* One Big Beautiful Bill Act, H.R. 1, 119th Cong., § 112009 (2025) (under which solar, wind, and battery investment tax credits and production tax credits would be available only for facilities placed in service by December 31, 2028)

[31] Evergy Kansas Central and Evergy Metro 2024 Triennial Integrated Resources Plan, Docket No. 24-EKCE-387-CPL (filed May 17, 2024) ("2024 Triennial IRP").

[32] Report of Kansas Electric Power Cooperative, Inc. on the Evergy Kansas Central and Evergy Metro 2024 Triennial IRP, Docket No. 24-EKCE-387-CPL, at ¶¶ 21-27 (filed October 14, 2024).

retire useful generating resources. Building new resources is challenging in *any* market. Experience has shown that Evergy's retirement expectations have been premised on overly-optimistic outlooks regarding market forecasts and execution risks. These project development risks will only get worse as competition increases for limited, high quality projects and suppliers. The consequences of a premature retirement of a large, utility-scale generating facility that provides firm, baseload power in a supply-constrained market could be severe and irreversible.

22. Evergy's current retirement schedule for Jeffrey Unit 3 also does not include a reasonable margin of safety with respect to its anticipated capacity position and resource adequacy requirements. Noted in the Preferred Plan, ACAA, the capacity balance in years 2028 and 2029 is only 1 MW, which assumes that new anticipated wind, solar and a combined cycle unit are built and operational by June 1 in each of those years.[33] This expected capacity position would leave Evergy's resource adequacy obligations on a knife's edge, with no room for error. From the execution challenges that Evergy has experienced to date, such an approach is clearly imprudent, and Evergy should restructure its capacity assumptions to ensure an adequate margin of safety at all times under its preferred plan.

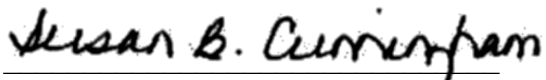
23. Accordingly, Evergy should not commit to any retirement decision of Jeffrey Unit 3, or either of the Lawrence Units, until it has fully executed on replacement resources that will compensate for these shortfalls with a reasonable margin of safety, and only after a comprehensive evaluation of retirement alternatives has been conducted to ensure retirement is, in fact, the best option available.

[33] *See* Evergy KC Worksheet "KSC ACAA.xls," Tab "capbalance," at Columns H and I, Row 39, relevant excerpt attached as Attachment C.

III. Conclusion

24. Evergy's plans to defer retirement of Lawrence Units 4 and 5, and Jeffrey Unit 2, and convert these units to natural gas-powered operation is a positive development and the result of Evergy's willingness to adapt to changing market conditions. However, the same consideration has not been afforded to Evergy's plan to retire Jeffrey Unit 3 in 2030. Changed market conditions, a significant shift in federal energy policy, and continued execution difficulties demand a proactive approach to consider reasonable alternatives to retirement. KEPCo recommends that Evergy undertake a comprehensive analysis into its decision to retire Jeffrey Unit 3 in 2030, to provide transparency into the relative costs of this decision. KEPCo further recommends that no retirement decisions be committed to until adequate replacement resources have achieved operation, and there is an adequate margin of safety with Evergy's capacity position as compared to its resource adequacy obligations. Continued improvements to Evergy's analysis in accordance with KEPCo's recommendations will benefit all Kansas end-users.

Respectfully submitted,



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July 2, 2025

ATTACHMENT A

Evergy KS Central and KS Metro
Case Name: 2024 Evergy KS Central and Metro Triennial IRP
Case Number: 24-EKCE-387-CPL

Requestor Howe Nathan -
Response Provided June 24, 2025

Question:KEPCO-3-03
RE: *In re Triennial Compliance Docket for the Integrated Resource Plan of Evergy Central, Inc. & Evergy Kansas Metro, Inc. Pursuant to the Commission's Order in 24-EKCE-387-CPL.*

Please Provide the Following:

Please explain in detail:

a. The reasons why, in the 2025 Annual Update, Evergy has tested scenarios for continued operation and conversion to natural gas for Jeffrey Energy Center Unit 2 beyond 2030, but has not tested any alternatives to a 2030 retirement for Jeffrey Energy Center Unit 3.

b. Each item of consideration that Evergy believes makes Jeffrey Energy Center Unit 3 a more cost-effective option for retirement over Jeffrey Energy Center Unit 2, including the estimated cost difference associated with each such item of consideration.

c. Please explain how considerations regarding expectations of rapid development of large loads, including data centers, have been taken into account in Evergy's decision not to test alternatives to retirement of Jeffrey Energy Center Unit 3 in 2030, including any contingency plans Evergy has considered with respect to this unit.

d, Please provide the date by which Evergy intends to make a decision whether or not to retire the Jeffrey Energy Center Unit 3 in 2030

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

Confidentiality: PUBLIC
Statement: This response is Public. No Confidential Statement is needed.

Response:
a. Evergy has taken a balanced approach in planning, recognizing that the Jeffrey resources are aging and have experienced prolonged outages in the past few years. Evergy is planning for the retirement of Jeffrey 3 as a base planning assumption to account for the risk of operational issues

which could require long-lead-time or expensive repairs, and the risk of needing to install a costly selective catalytic reduction (SCR) system to comply with environmental mandates. By incorporating this retirement, Evergy plans to build or procure the capacity needed to replace the resource or a similarly sized resource (Jeffrey 2 or Jeffrey 1).
b. Jeffrey Units 2 and 3 are very similar from a planning perspective. Both resources will likely need expensive upgrades (SCR) to comply with environmental rules if they continue to burn coal. Jeffrey 3 is expected to have lower accredited capacity because it has had long forced outages which reduce its performance-based accreditation.
c. With increasing load forecasts and resource adequacy requirements, Evergy seeks to maintain as much flexibility and optionality as possible with its coal fleet. However, Evergy must also realistically assess the future operational and environmental compliance risks to customers and plan for a responsible transition to aging baseload units in the fleet. The lead time to build new generation is expected to be at least five years for the firm dispatchable generation that will be part of the portfolio needed to replace a large coal unit like a Jeffrey unit. Evergy's IRP planning takes a balanced approach that recognizes the need to reduce reliance and spending on aging resources and add new generation to mitigate the risks to customers of costly repairs or failure to meet reliability requirements.
d. Evergy does not have a specific date identified and is planning to maintain optionality as long as possible.

Information provided by:
Kelli Merwald, Sr. Mgr. Fundamental Analysis
Attachment(s):

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

ATTACHMENT B

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

DIRECT TESTIMONY OF

JASON HUMPHREY

ON BEHALF OF EVERGY METRO, INC., EVERGY KANSAS CENTRAL, INC. AND EVERGY KANSAS SOUTH, INC.

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. 66-117.

Docket No. 25-EKCE-207-PRE

November 6, 2024

update to the IRP in order to determine the impact they have on our generation construction plan in the future.

Q. Mr. Olson has indicated that EKC will update its cost estimate for the EPC contract for the CCGTs in February. Why didn't the Company wait for absolute cost certainty before making this predetermination filing?

A. Utility planners do not operate in an environment of absolute certainty, and the resource acquisitions under review in this case cannot be delayed if we hope to preserve our ability to meet the capacity and energy needs of our customers. The future will always be uncertain, but projects of this size cannot be planned, engineered, and constructed without starting. The balance of factors indicate now is the right time to move forward, as indicated with the 2024 Triennial IRP as well as the incremental analysis provided by company witness VandeVelde.

Q. What risks come with delaying these resource acquisitions?

A. The most fundamental risk is not moving forward with these projects now while sites have been selected, gas turbine slots have been secured, and a thoughtful approach to engineering, procurement and construction is being pursued. And with the dramatic rise in inflation over the past several years—particularly for new power generation projects—waiting would likely result in additional cost increases. Nearly two years of effort has gone into reaching this point, and Evergy is well positioned to drive toward the successful completion of these projects.

If we wait, we risk suffering the consequences of further inflation in a new-build environment with significant demand for electricity and new generation throughout the United States. In the Evergy utility territories alone, more than 750 MW of new, high load-

factor customers have been announced, with approximately 6 gigawatts in the pipeline. The planning environment continues to evolve and is becoming increasingly dynamic. This means the value of moving forward with new, flexible resources is at a premium. The addition of these new, flexible resources allows us to focus on reliability and affordability while adapting to a fast-changing environmental, technological, and market landscape. In short, in the current environment, deferral of resource additions is not a viable option.

B. Solar Project

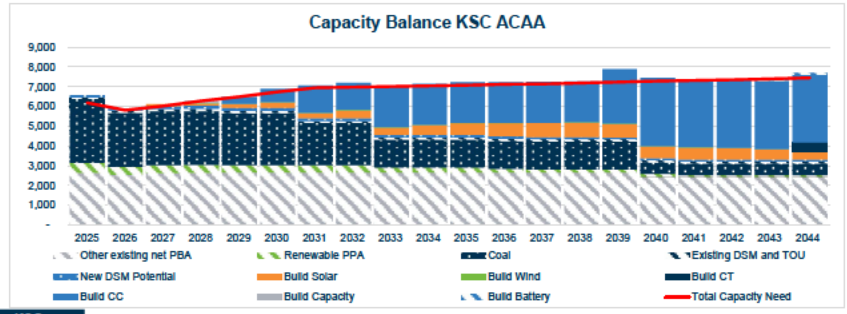
Q. Please describe the proposed solar addition.

A. The solar addition, known as Kansas Sky Solar ("Kansas Sky"), is a 199 MW_{DC} /159 MW_{AC} single-axis tracking photovoltaic solar facility located in Douglas County, Kansas. The project interconnects to the transmission grid at the 115 kV Midland Junction substation owned by Evergy Kansas Central. Kansas Sky is being developed by Savion, LLC ("Savion") and is projected to go commercial in December 2026. Further detail on the Kansas Sky project is included in the Direct Testimony of company witness John Carlson.

Q. Please describe the acquisition plan for the Kansas Sky project.

A. The Kansas Sky acquisition is structured as a purchase and sale agreement. A project company subsidiary of Savion, known as Free State Solar Project, LLC ("FSSP"), has been established to secure land rights, permits and interconnection rights, and to develop a 30% design and engineering, procurement and construction ("EPC") bid package. After all conditions of closing are met, EKC will acquire the equity interests in FSSP and the associated development assets upon closing at Notice to Proceed ("NTP"). Immediately after closing, EKC plans to effect a short-form merger of FSSP with and into EKC, with EKC surviving the merger in order to consolidate the assets of the project company with those of EKC.

ATTACHMENT C



Utility Modeled	KSC

Capacity Balance KSC ACAA

Line Item	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044
Total Capacity Need	6,181	5,806	6,008	6,274	6,491	6,726	6,942	6,970	6,996	7,029	7,065	7,109	7,143	7,183	7,226	7,278	7,314	7,351	7,395	7,442
Other existing net PBA	2,633	2,545	2,619	2,637	2,645	2,653	2,653	2,653	2,653	2,653	2,653	2,653	2,655	2,655	2,655	2,425	2,425	2,425	2,425	2,425
Coal	3,217	2,735	2,734	2,728	2,641	2,638	2,126	2,127	1,403	1,403	1,403	1,403	1,403	1,403	1,403	581	581	581	581	581
Existing DSM and TOU	108	108	108	108	108	108	108	108	108	108	108	108	108	108	108	108	108	108	108	108
Renewable PPA	525	400	400	400	379	374	374	374	265	265	265	205	167	167	167	167	104	104	104	104
Net Need	**(302)**	**19**	**147**	**401**	**717**	**953**	**1,681**	**1,709**	**2,567**	**2,600**	**2,636**	**2,740**	**2,810**	**2,850**	**2,894**	**3,998**	**4,097**	**4,134**	**4,178**	**4,225**

New Additions	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044
New DSM Potential	61	96	147	171	150	149	146	142	136	134	132	128	120	112	106	104	103	100	97	98
Build Wind	-	-	-	22	22	22	21	21	21	21	21	20	20	20	20	20	20	20	19	19
Build Solar	-	-	107	101	188	265	251	393	368	481	574	648	703	738	666	594	591	570	504	408
Build CT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	427
Build CC	-	-	-	-	344	689	1,377	1,377	2,066	2,066	2,066	2,066	2,066	2,066	2,755	3,444	3,444	3,444	3,444	3,444
Build Battery	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	86	83
Build Capacity	-	-	-	107	13	-	-	-	-	-	-	-	-	-	-	-	-	2	29	-
Net Additions	**61**	**96**	**254**	**401**	**717**	**1,124**	**1,796**	**1,933**	**2,592**	**2,701**	**2,793**	**2,862**	**2,909**	**2,937**	**3,547**	**4,162**	**4,158**	**4,135**	**4,179**	**4,478**
Capacity Balance	**363**	**78**	**107**	**1**	**1**	**171**	**115**	**224**	**25**	**102**	**157**	**123**	**99**	**87**	**654**	**164**	**60**	**1**	**1**	**253**

VERIFICATION
(K.S.A. 53-601)

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I, Susan B. Cunningham, verify under penalty of perjury that I have caused the foregoing Comments of Kansas Electric Power Cooperative, Inc. on the Evergy Kansas Central 2025 Annual Update to be prepared on behalf of Kansas Electric Power Cooperative, Inc.; that I have read and reviewed the Comments; and that the contents thereof are true and correct to the best of my information, knowledge, and belief.

Susan B. Cunningham

Executed on this 2nd day of July, 2025

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing was electronically served or placed in the United States mail, postage prepaid, this 2nd day of July, 2025, addressed to the following:

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