

**BEFORE THE STATE CORPORATION COMMISSION
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) 25-EKCE-207-PRE
Apply to the Recovery in Rates of the Cost to be)
Incurred for Certain Electric Generation Facilities)
under K.S.A. 66-1239)**

CROSS-ANSWERING TESTIMONY

PREPARED BY

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UTILITIES DIVISION

KANSAS CORPORATION COMMISSION

March 21, 2025

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1 **I. Introduction, Qualifications, Purpose and Overview of Testimony**

2 **Q. Please state your name and business address.**

3 A. My name is Justin T. Grady, and my business address is 1500 Southwest Arrowhead
4 Road, Topeka, Kansas, 66604.

5 **Q. Are you the same Justin T. Grady that filed Direct Testimony on March 14,**
6 **2025, in this Docket?**

7 A. Yes.

8 **Q. What is the purpose of your Cross-Answering Testimony?**

9 A. In the testimony that follows I will respond to the Direct Testimony of Nick Jones,
10 who filed Direct Testimony in this Docket on behalf of New Energy Economics
11 (NEE). I will address Mr. Jones’ assertions that the natural gas price forecasts used
12 in Evergy’s capacity expansion modeling in this Docket are biased to the downside,
13 thereby underestimating the fuel cost and risk associated with the decision to build
14 and own a 50% share of both the Viola and McNew Combined Cycle Gas Turbines
15 (CCGTs). I will then respond to the Direct Testimony of Michael P. Gorman, who

1 filed Direct Testimony on behalf of Kansas Industrial Consumers Group, Inc. The
2 fact that I am not responding to other parties' Direct Testimony at this time should
3 not be construed as agreement with other parties' positions, but rather a reflection of
4 the limited time available to prepare cross-answering testimony for this Docket.

5 **II. Response to the testimony of Mr. Jones**
6

7 **Q. What specific testimony of Mr. Jones are you responding to?**

8 A. I'm responding to Mr. Jones' assertions that Evergy has not adequately represented
9 the probable cost of natural gas, and that the Company's natural gas forecast and fuel
10 supply plan could expose ratepayers to unreasonable risk. These assertions are
11 generally contained within the first 24 pages of Mr. Jones' Direct Testimony. The
12 fact that I have not responded to the rest of Mr. Jones' Direct Testimony, should not
13 be construed as my agreement with the entirety of that testimony, rather it reflects the
14 limited time available to prepare cross-answering testimony for this Docket.

15 **A. NEE Criticisms of Evergy's Natural Gas Price Forecast**
16

17 **Q. Did Mr. Jones' Direct Testimony restate the criticisms of NEE from the 2024**
18 **Integrated Resource Plan (IRP) pertaining to Evergy's natural gas forecast?**

19 A. Yes. Beginning on page five of his Direct Testimony, Mr. Jones restates the criticism
20 that Evergy's mid-case natural gas forecast is out of line with Evergy's recent realized
21 costs. Further, he states that the company's high-case scenario is better aligned with
22 historical costs yet underweighted in the analysis. To support these conclusions, Mr.
23 Jones relies on two primary arguments, restated here:

1 1. The Company’s use of the Henry Hub national price
2 benchmark, which discounts the regional market dynamics
3 that can often inflate the price of delivered fuel.

4
5 2. Evergy forecasts prices on a monthly cadence, which
6 discounts the potential for short-term fluctuations to raise costs
7 during periods of peak demand.¹
8

9 **B. Henry Hub Criticism**

10
11 **Q. Is Mr. Jones correct in his assertion that Evergy based its natural gas price**
12 **forecast off the Henry Hub national price benchmark?**

13 A. No. I addressed this criticism directly on pages 66-68 of my Direct Testimony in this
14 Docket. The response to Staff Data Request No. 40 in this Docket clearly
15 demonstrates that Evergy has adjusted the Henry Hub benchmark price by the
16 Panhandle Eastern basis differential for purposes of its natural gas price forecasts in
17 the 2024 IRP, and which was the basis of the capacity expansion modeling performed
18 in this Docket. Accordingly, the Commission should disregard any assertion to the
19 contrary in Mr. Jones’ Direct Testimony.

¹ See Nick Jones Direct Testimony at page 6.

1 **C. Short Term Fluctuations Criticism**
2

3 **Q. Is Mr. Jones correct in his assertion that Evergy’s monthly natural gas price**
4 **forecasts discount the potential for short-term fluctuations to raise costs during**
5 **periods of peak demand?**

6 A. No. Staff agrees that Evergy’s natural gas price forecast reflects a monthly cadence
7 and that natural gas prices can exhibit significant short-term fluctuations outside of
8 the range of monthly forecasts. But this does not mean that Evergy’s monthly
9 forecast “discounts” the potential for these fluctuations, or that Evergy’s monthly
10 forecast understates the historical realized cost of natural gas at Evergy facilities. To
11 the contrary, as shown in detail below, Evergy’s historical realized gas purchases
12 demonstrate the reasonableness of its mid-case natural gas forecast.

13 **D. Evaluation of Evergy Delivered Natural Gas Prices**
14

15 **Q. What evidence does Mr. Jones provide in support of his assertions that Evergy’s**
16 **natural gas price forecast is biased to the downside?**

17 A. Most of Mr. Jones’ testimony in support of this assertion relies on comparisons to an
18 outdated natural gas forecast from the 2021 IRP that is not used to support the
19 reasonableness of the CCGTs in this Docket. However, Mr. Jones does refer to the
20 2024 IRP forecast when he states on page 8 of his Direct Testimony: “[y]et, as NEE
21 noted in comments on the 2024 IRP, the updated [2024] mid-case forecast still sits
22 below average prices and costs from recent years.” He continues by stating: “[a]s

1 NEE explained in its 2024 Triennial IRP comments, the Company’s current high-
2 case forecast appears more reasonable when compared against recent history.”

3 **Q. Does Staff agree that an evaluation of average prices and costs of natural gas**
4 **from recent years leads to the conclusion that Evergy’s mid-case natural gas**
5 **forecast is biased to the downside, making Evergy’s high-case natural gas**
6 **forecast more reasonable?**

7 A. No. As I demonstrate in the testimony that follows, using NEE’s workpapers and the
8 response to Staff Data Request No. 40 in this Docket, if you compare Evergy’s
9 historical realized natural gas costs to the natural gas forecasts contained in the 2024
10 IRP, the result is a confirmation of the reasonableness of Evergy’s natural gas
11 forecasts. You also come away with the conclusion that it would be unreasonable to
12 rely solely on Evergy high-case natural gas forecasts as NEE recommends in this
13 Docket. Lastly, I am reiterating the evidence from my Direct Testimony showing
14 that current forward market curves for locally priced natural gas are supportive of
15 Staff’s determination of the reasonableness of Evergy’s mid-case natural gas forecast.

16 **Q. On Page 15 of Mr. Jones’ Direct Testimony, he testifies that the average**
17 **delivered cost of natural gas to the Hawthorn combined cycle facility averaged**
18 **\$3.84 per MMBtu during the period of June 2022 through July 2024. Does this**
19 **indicate to Staff that Evergy’s mid-case natural gas forecast is unreasonable?**

20 A. No. In fact, this testimony demonstrates that even though delivered natural gas prices
21 “spiked” to \$11.13/MMbtu in December of 2022, and \$10/MMbtu in January of
22 2024, when these observations are averaged in with the rest of the lower cost
23 purchases over this time frame, the result is a reasonable \$3.84/MMbtu cost of natural

1 gas. The average natural gas cost level remains reasonable because these price spikes
2 didn't occur during months in which a significant volume of gas was being purchased
3 as Mr. Jones alludes, they occurred during relatively low gas purchase volume
4 months.²

5 On pages 18-20, Mr. Jones also attempts to support his claims by evaluating
6 the delivered cost of natural gas at Evergy's other natural gas plants, although his
7 testimony focuses on "spot" purchases and average winter delivered costs, instead of
8 an all-in weighted average purchased gas cost. Using Mr. Jones' workpapers, Staff
9 calculated the average delivered cost of natural gas to Evergy's fleet to be
10 \$3.59/MMBtu from June 1, 2022, through August 1, 2024. Both of these average gas
11 price amounts support the reasonableness of Evergy's mid-case natural gas cost
12 forecast as discussed further below.

13 **Q. How do these recent realized gas prices compare to Evergy's mid-case natural**
14 **gas price forecast from the 2024 IRP Docket, as used in the capacity expansion**
15 **modeling provided in this Docket?**

16 A. These recent realized gas prices demonstrate the reasonableness of Evergy's mid-
17 case natural gas price forecasts, and they demonstrate how unreasonable it would be
18 to only use the high-case natural gas price forecast to evaluate the fuel costs or
19 revenue requirement impacts of the CCGTs. In response to Staff Data Request No.
20 40, Evergy provided its mid-case natural gas price forecast for every month from
21 January 2024 through December 2047. For example, for the months of January 2024

² According to Mr. Jones' workpapers, the volume of natural gas purchased in December 2022 at the Hawthorn site was 230,370 MMBtu, and 449,565 MMBtu in January 2024. This compares to the average volume of 546,744 MMBtu from June 1, 2022, to August 1, 2024.

1 through August 2024, Evergy's mid-case natural gas price forecast averaged
2 \$3.16/MMbtu. Evergy's high-case natural gas price forecast for these months
3 averaged \$4.51/MMbtu. This compares to the actual delivered natural gas price of
4 \$2.48/MMbtu for these same months, as calculated from Mr. Jones' workpapers.
5 Clearly the \$2.48/MMbtu is below the mid-case forecast of \$3.16/MMbtu and is
6 much closer to the mid-case forecast than the high-case forecast.

7 **Q. What if we look back further, say from January 1, 2019, through August 1,**
8 **2024? Do those delivered gas prices indicate the unreasonableness of Evergy's**
9 **mid-case natural gas price forecast?**

10 A. No. Looking back further, Evergy's actual delivered gas prices, even inclusive of
11 Winter Storm Uri, are supportive of the reasonableness of using the mid-case natural
12 gas price forecast and demonstrate how unreasonable it would be to use the high-case
13 natural gas price forecast. The average delivered natural gas price to Evergy's fleet
14 was \$3.85/MMbtu from January 2019 through August 2024. This includes the impact
15 of Winter Storm Uri in February 2021. If we exclude Winter Storm Uri, the price
16 drops to \$3.53/MMbtu. This compares to Evergy's mid-case natural gas price
17 forecast of \$3.70/MMbtu for the first five years of the forecast (2024-2029), and
18 \$4.25/MMbtu for the next five years (2030-2035). This evidence demonstrates that
19 Evergy's actual delivered gas costs over the last five and a half years, were very close
20 to the mid-case forecast values for the next five years, even when Winter Storm Uri
21 gas purchases are included in the actual costs.

22

1 **Q. Do these actual delivered natural gas prices indicate the unreasonableness of**
2 **relying solely on the high-case natural gas price forecast?**

3 A. Yes. Evergy's high-case natural gas price forecast is significantly higher than these
4 actual delivered natural gas prices. The high-case natural gas price forecast for 2024
5 to 2029 is \$6.20/MMbtu and \$7.10 per MMBtu from 2030-2035. Evergy's actual
6 delivered natural gas prices only reached higher than \$6.20/MMbtu in 11 out of 68
7 months (16%) during this time. While the price spikes in these months certainly
8 increased the weighted average delivered price, the result was still an average
9 delivered price of \$3.85/MMbtu from the period of January 2019 through August
10 2024, which is significantly less than the high-case averages provided here.

11 **E. Treatment of Transportation Costs in Gas Comparisons**
12

13 **Q. Are gas transportation costs included equally in both the delivered natural gas**
14 **prices and the forecasted natural gas prices discussed above?**

15 A. No. As described in response to Staff Data Request No. 41 and 42, the delivered
16 natural gas prices relied on by Mr. Jones include natural gas transportation charges,
17 however the Evergy natural gas price forecasts do not include transportation charges.
18 Evergy modeled natural gas transportation as a fixed monthly cost of the plants,
19 separate from the commodity cost of the plants.
20
21

1 **Q. On page 16 of Mr. Jones' Direct Testimony, he acknowledges this discrepancy,**
2 **but he describes it as "likely only accounting for a minority of the discrepancy."**
3 **Do you agree with this testimony?**

4 A. No. Mr. Jones explains that firm transport costs during this period were no more than
5 \$.22 MMBtu, however Mr. Jones misses the fact that these costs are not assessed
6 volumetrically based on actual flowing gas, they are assessed as a fixed cost per unit
7 of reserved capacity. This means that the discrepancy grows during small volume
8 months, like many of the winter months used in Mr. Jones' examples and shrinks
9 during higher volume months like summer months. Using simple math, in months in
10 which the fixed transportation costs stayed the same, but delivered volume was 50%
11 less than average, the discrepancy would grow to \$.44/MMbtu. At lower volumes of
12 delivery, the discrepancy would grow even more. As set forth in my Direct
13 Testimony, because the delivered gas prices as reported through EIA form 923
14 contain transportation costs, and the gas price forecasts used in this Docket do not,
15 the Commission should use caution when performing these direct comparisons.³

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³ See my Direct Testimony at page 67.

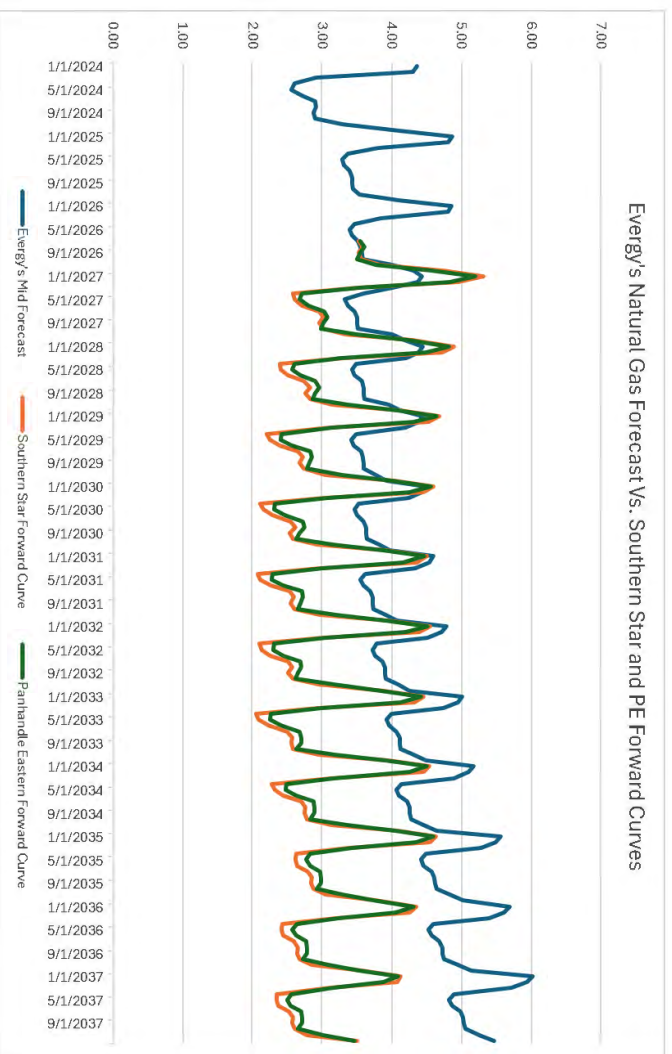
1 **F. Natural Gas Price Forwards Vs. Evergy Forecasts**
2

3 **Q. In your Direct Testimony at page 69, you provided evidence from the natural**
4 **gas markets that points to the long-term stability of natural gas prices through**
5 **2037. Please elaborate here as to why you believe that evidence contradicts Mr.**
6 **Jones' recommendation to use Evergy's high-case natural gas price forecast**
7 **instead of Evergy's mid-case natural gas price forecast.**

8 A. In my Direct Testimony, I testified that the current forward markets for natural gas
9 are not indicative of an unstable and growing natural gas price. This is contrary to
10 the testimony of Mr. Jones at pages 9-10, in which he states that increased demand
11 for natural gas is likely to inflate natural gas fuel prices overtime. In the testimony
12 that follows, I will compare the monthly data from the S&P Global Market
13 Intelligence forward market price curves introduced in my Direct Testimony, to
14 Evergy's mid-case and high-case natural gas price forecasts.

15 **Q. Have you compared Evergy's mid-case natural gas forecast to the forward**
16 **market curves for Southern Star and Panhandle Eastern from your Direct**
17 **Testimony?**

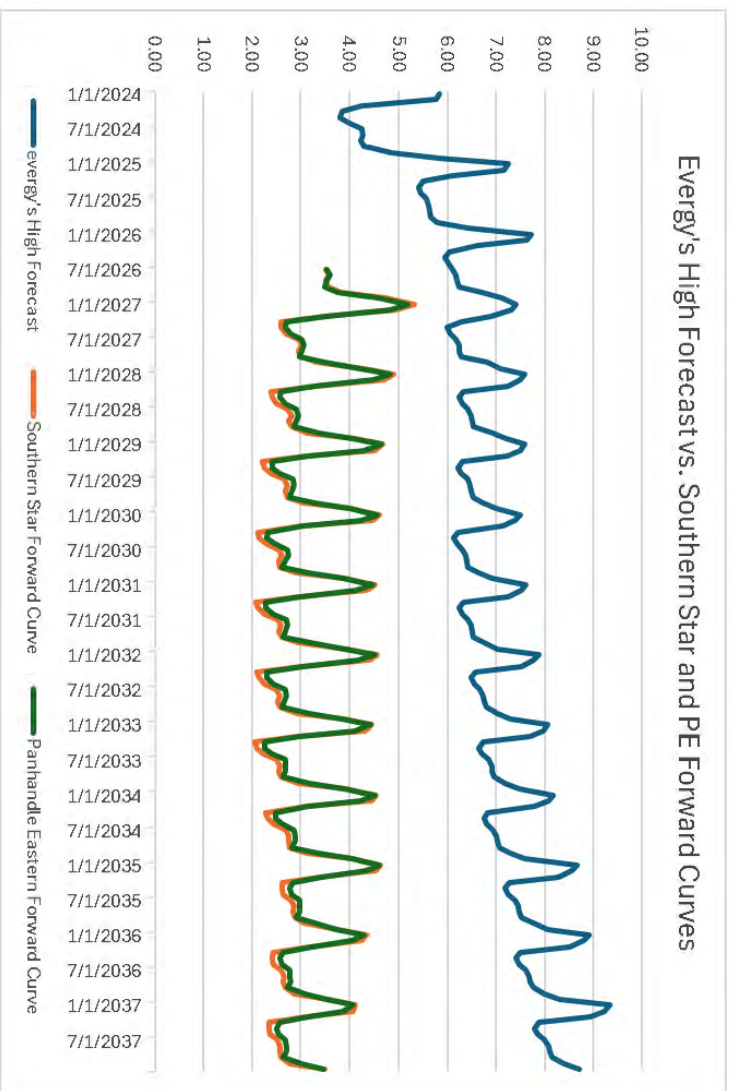
18 A. Yes. The following chart plots Evergy's mid-case natural gas forecast from the 2024
19 IRP, and as used in the capacity expansion modeling in this Docket, to the market
20 forward curves for Southern Star and Panhandle Eastern as of March 12, 2025.



1
2 As demonstrated in the chart above, Evergy’s mid-case natural gas price forecast (in
3 blue) lines up quite well with current natural gas price forward curves for local natural
4 gas (in green and yellow). From July 1, 2026, through year end 2037 (the same
5 months represented in the forward curves), Evergy’s mid-case natural gas price
6 forecast averages \$4.26/MMbtu, whereas the Southern Star forwards for this time
7 frame average \$3.11 for Southern Star and \$3.19 for Panhandle Eastern. I contend
8 this supports the reasonableness, and likely conservative nature, of Staff’s reliance
9 on Evergy’s mid-case natural gas forecast in this Docket.

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- 1 **Q.** Mr. Jones recommends that the Commission use Evergy's high-case natural gas
2 cost forecast to evaluate the fuel costs and overall efficiency of the CCGTs in
3 this Docket. How does Evergy's high-case natural gas forecast compare to the
4 forward market price curves you provided in Direct Testimony?
5 A. The chart below shows how extreme Evergy's high-case natural gas price forecast is
6 compared to current forward market curves for locally priced gas.



- 7
8 For the same months represented in the forward curves, Evergy's high-case natural
9 gas price forecast averages \$7.15/MMBtu, whereas the Southern Star forwards for
10 this time frame average \$3.11 for Southern Star and \$3.19 for Panhandle Eastern.
11 This is a clear indication that the high-case natural gas costs are too high to be relied
12 on, and instead the Commission should utilize Evergy's mid-case natural gas costs to

1 evaluate the reasonableness of Evergy's decision to build and own 50% of each of
2 the CCGTs in this proceeding.

3 **III. Response to the testimony of Mr. Gorman**
4

5 **Q. What testimony of Mr. Gorman are you responding to?**

6 A. I'm responding to Mr. Gorman's assertions that Evergy's 2024 IRP changed the life
7 of Evergy's coal facilities causing an increase in the cost of resource portfolios
8 containing coal resources. According to Mr. Gorman, this results in a resource plan
9 that is biased towards CCGT resources. The fact that I have not responded to the rest
10 of Mr. Gorman's Direct Testimony should not be construed as my agreement with
11 the entirety of that testimony, rather it reflects the limited time available to prepare
12 cross-answering testimony for this Docket.

13 **Q. Please point the Commission to the specific testimony references you wish to**
14 **refute.**

15 A. On page 14, Mr. Gorman states:

16 Shortening the Commission approved remaining life of the coal
17 production resources increases the NPVRR cost for resource
18 portfolios that include the coal resources. This assumption is not
19 reasonable nor economical.
20

21 On page 15, Mr. Gorman states:

22 Changing the Commission's approved expected remaining life of
23 the production facilities increases the cost of resource portfolios that
24 include the coal resources. This assumption biases the Company's
25 planning result toward portfolios that rely on CCGTs.
26

27

1 Lastly, on page 16 Mr. Gorman states the following:

2 Early retirement of the coal resources will result in retiring the
3 facility before it is fully depreciated which can have negative impact
4 on the Company's ability to maintain a competitive cost of service to
5 support affordable rates. Specifically, retiring a generating unit
6 before its expected useful life is completed results in abandoned plant
7 cost at retirement because the facility is not yet fully depreciated.
8 Abandoned plant costs will increase the utility's revenue requirement
9 because the utility will need to recover the abandoned plant cost
10 while also start recovering the revenue requirement of the
11 replacement production resource. This early retirement assumption
12 inflates the revenue requirements and distorts the IRP planning
13 economic projection of the NPVRR for the resource portfolio that
14 includes plants that are retired early.

15

16 **Q. What is your response to Mr. Gorman's testimony on pages 14 through 16 as**
17 **restated above?**

18 **A.** Mr. Gorman's description of the IRP process in these three testimony references is
19 not entirely accurate. As a member of Commission Staff, I have participated in the
20 review of the Evergy's last three IRP filings, and I can confirm that Mr. Gorman's
21 description of the impact of an early retirement decision is not modeled in the fashion
22 that Mr. Gorman describes.

23 Evergy's IRP filings do evaluate discrete portfolios of potential early coal
24 retirements, including the costs associated with replacement resources. When this
25 happens, there is no impact on the NPVRR for that discrete portfolio associated with
26 the recovery of the remaining net book value of the asset over a shorter time frame
27 as Mr. Gorman describes. Instead, the IRP modeling assumes the same NPVRR
28 associated with the recovery of the existing net book value of the asset, in a retirement
29 scenario versus a non-retirement scenario. Essentially, Evergy models these

1 retirement scenarios assuming that the remaining book value of the asset will
2 continue to be recovered in the same fashion and over the same time period as if the
3 unit had not retired. Therefore, Mr. Gorman's description of the IRP modeling is
4 incorrect in that it does not reduce the anticipated life of the coal facilities in each
5 resource portfolio which contains the coal units and thereby increase the resulting
6 NPVRR, which would bias the resource plan selection towards CCGTs.

7 **IV. Conclusions**

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9
10 **Q. What conclusions do you wish the Commission to draw from your Cross-**
11 **Answering Testimony?**

12 A. The Commission should conclude, as Staff has, that Evergy's mid-case natural gas
13 forecast is a reasonable estimate of the cost of natural gas to serve the CCGTs. This
14 forecast is conservative when compared to Evergy's historical delivered costs of
15 natural gas, even considering the extreme price shocks of Winter Storm Uri, and it is
16 conservative when compared to the current forward market curves for locally priced
17 natural gas. Accordingly, the Commission should not be convinced by Mr. Jones'
18 testimony where he recommends that the Commission should rely on Evergy's high-
19 case natural gas forecasts to evaluate the CCGTs, or in the places that he criticizes
20 the reasonableness of Evergy's mid-case natural gas forecasts.

21 The Commission should not be persuaded by Mr. Gorman's Direct Testimony
22 where he asserts that Evergy's IRP modeling is biased towards the early retirement
23 of coal fired generators, and towards the selection of resource plans that contain
24 CCGTs.

1


2 **Q. Does this conclude your testimony?**

3 A. Yes, thank you.

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

VERIFICATION


Justin T. Grady, being duly sworn upon his oath deposes and states that he is Deputy Director of the Utilities Division of the Kansas Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Cross Answering Testimony*, and attests that the statements contained therein are true and correct to the best of his knowledge, information and belief.


Justin T. Grady
Deputy Director of the Utilities Division
State Corporation Commission of the
State of Kansas

Subscribed and sworn to before me this 20 day of March, 2025.


Notary Public

My Appointment Expires: 4/28/25

 NOTARY PUBLIC - State of Kansas
ANN M. MURPHY
My Appt. Expires 4/28/25

CERTIFICATE OF SERVICE

25-EKCE-207-PRE

I, the undersigned, certify that a true and correct copy of the above and foregoing Cross Answering Testimony was served via electronic service this 21st day of March, 2025, to the following:

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