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

NOTICE OF LATE FILED HEARING EXHIBIT AND MOTION TO ADMIT

Pursuant to the Kansas Corporation Commission's ("Commission") oral direction at the April 21 through April 23, 2025, evidentiary hearing in the above-captioned proceeding, the Council for the New Energy Economics ("NEE") hereby submits late-filed Exhibit NEE-03 and moves for admission of Exhibit NEE-03 into the record.

1. On November 6, 2024, Evergy Kansas Central, Inc. ("EKC"), Evergy Kansas South, Inc. ("EKS"), Evergy Metro ("EM"), and Evergy Kansas Metro ("EKM") (collectively, "Evergy") filed a petition with the Commission requesting a 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.

2. On April 21 through April 23, 2025, the Commission held an evidentiary hearing in this matter. At the evidentiary hearing, the Commissioners asked several questions of NEE's witness, William "Nick" Jones. In responding to these questions, Mr. Jones referenced a recently published report from the Federal Reserve Bank of Kansas City that discussed the expected natural gas price forecast in the region.

3. At the conclusion of the evidentiary hearing, the Commission requested that NEE submit this report as a late-filed hearing exhibit. NEE has labeled this report as Exhibit NEE-03

and attached it hereto.

4. Admission of Exhibit NEE-03 comports with the Commission's direction and will supplement the record to provide the Commission with additional data points as to expected natural gas prices that will impact the cost of operations at Evergy's proposed Viola and McNew plants. Accordingly, NEE respectfully moves for the admission of Exhibit NEE-03 into the record of this proceeding.

WHEREFORE, NEE respectfully requests that the Commission accept this *Notice of Late-Filed Hearing Exhibit NEE-03*, admit Exhibit NEE-03 into the record, and to grant any other relief the Commission deems just and appropriate.

Respectfully submitted,

By: <u>/s/ Alissa Greenwald</u> Alissa Greenwald, Kansas Bar No. 30510 KEYES & FOX LLP 1580 Lincoln St., Suite 1105 Denver, CO 80203 Telephone: (913) 302-5567 agreenwald@keyesfox.com

ATTORNEY FOR THE COUNCIL FOR THE NEW ENERGY ECONOMICS Docket No.: 25-EKCE-207-PRE Party: The Council for the New Energy Economics Hearing Exhibit No.: NEE-03

Federal Reserve Bank of Kansas City / Denver / Oklahoma City / Omaha Tenth District Energy Activity Increased Slightly (April 11, 2025)

April 25, 2025

Tenth District Energy Activity Increased Slightly

by: Megan Williams and Chase Farha

April 11, 2025

First quarter energy survey results revealed that Tenth District energy activity increased slightly, and expectations remained expansionary. Firms reported that oil prices needed to be on average \$65 per barrel for drilling to be profitable, and \$85 per barrel for a substantial increase in drilling to occur. Natural gas prices needed to be \$3.80 per million Btu for drilling to be profitable on average, and \$5.10 per million Btu for drilling to increase substantially.

First quarter energy survey results revealed that Tenth District energy activity increased slightly, and expectations remained expansionary. Firms reported that oil prices needed to be on average \$65 per barrel for drilling to be profitable, and \$85 per barrel for a substantial increase in drilling to occur. Natural gas prices needed to be \$3.80 per million Btu for drilling to be profitable on average, and \$5.10 per million Btu for drilling to increase substantially.

Summary of Quarterly Indicators

Tenth District energy activity increased slightly in the first quarter of 2025, as indicated by firms contacted between March 17th, 2025, and March 31st, 2025 (Tables 1 & 2). The quarter-over-quarter drilling and business activity index was 6 in Q1, up from -13 in Q4 (Chart 1). Employment levels and employee hours increased moderately. Despite the increased activity, revenues and profits still declined, each with readings of -9.

Drilling activity remains lower than this time last year, with the year-over-year drilling/business activity index decreasing from -16 to -18 in Q1. Revenues and profits also fell over the year, and capital expenditures decreased moderately at a reading of -9.

Firms' expectations for future activity rose in Q1, from 13 to 21. Six-month expectations indexes for revenues and profits turned positive in Q1 and increased for capital expenditures. However, future employment is expected to rise only modestly.

Summary of Special Questions

Firms were asked what oil and natural gas prices were needed on average for drilling to be profitable across the fields in which they are active. The average oil price needed was \$65 per barrel (Chart 2), while the average natural gas price needed was \$3.80 per million Btu (Chart 3). Firms were also asked what prices were needed for a substantial increase in drilling to occur across the fields in which they are active. The average oil price needed was \$85 per barrel (Chart 2), and the average natural gas price needed was \$5.10 per million Btu (Chart 3).

Firms reported what they expected oil and natural gas prices to be in six months, one year, two years, and five years. The average expected WTI prices were \$67, \$69, \$72, and \$79 per barrel, respectively. The average expected Henry Hub natural gas prices were \$3.73, \$3.95, \$4.23, and \$4.78 per million Btu, respectively.

Firms were asked how they believe recent trade policy changes will affect their costs and demand/revenues over the next year (Chart 4). Most firms (62%) believe recent policy changes will increase costs over the next year, but expectations for demand/revenues are mixed. 44% of firms believe the changes will decrease demand, 38% believe they will not change demand, and 18% believe they will increase demand.

Contacts were also asked if they anticipate the share of their inputs/products sourced outside the U.S. to change one year from now and three years from now (Chart 5). 36% of firms anticipate the share of foreign-sourced products to decrease slightly in one year, 46% expect no change, 15% anticipate a slight increase, and 3% expect a significant increase. Additionally, 9% of firms expect their share of foreign-sourced products to decrease significantly in three years, 38% each expect it to decrease slightly and stay steady, 12% anticipate a slight increase, and 3% expect a significant increase. Chart 2. Special Question: What price is currently needed for a drilling to be profitable and for a substantial increase in drilling to occur for oil? What do you expect WTI prices to be in six months, one year, two years, and five years?

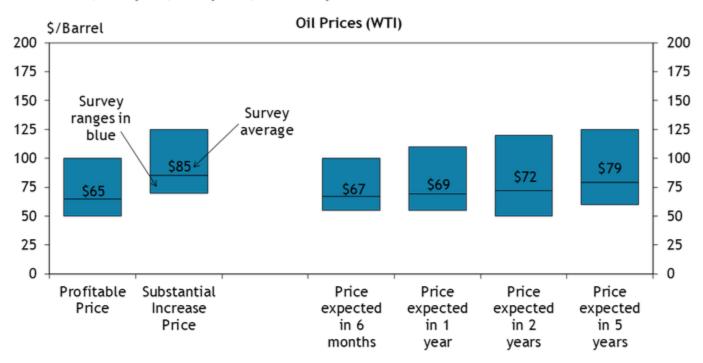


Chart 3. Special Question: What price is currently needed for a drilling to be profitable and for a substantial increase in drilling to occur for natural gas? What do you expect Henry Hub prices to be in six months, one year, two years, and five years?

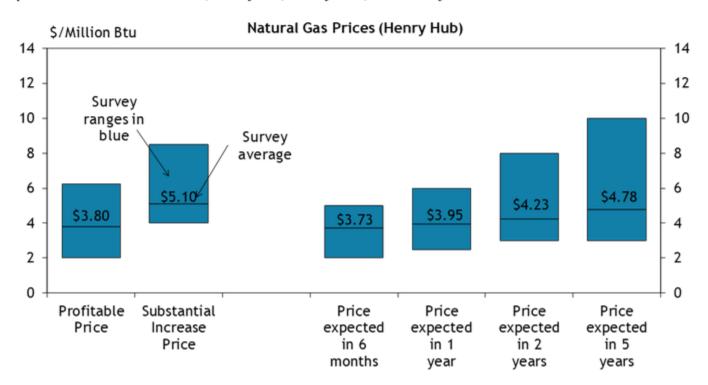


Table 1 Summary of Tenth District Energy Conditions, Quarter 1, 2025

	Qu	Quarter 1 vs. Quarter 4				uarter 1 v	s. Year Ag	0	Expected in Six Months					
		(percent)*				(percent)*				(percent)*				
		No Diff		No Diff			Diff		No	Diff				
Energy Company Indicators	Increase	Change	Decrease Index^		Increase	Change	Decrease Index^		Increase	Change	Decrease Index^			
Drilling/Business Activity	26	53	21	6	24	35	41	-18	32	56	12	21		
Total Revenues	35	21	44	-9	41	15	44	-3	42	30	27	15		
Capital Expenditures					21	50	29	-9	29	59	12	18		
Supplier Delivery Time	9	88	3	6	9	79	12	-3	15	79	6	9		
Total Profits	32	26	41	-9	35	21	44	-9	35	41	24	12		
Number of Employees	26	68	6	21	38	47	15	24	24	71	6	18		
Employee Hours	18	76	6	12	24	59	18	6	15	74	12	3		
Wages and Benefits	50	50	0	50	71	29	0	71	29	71	0	29		
Access to Credit	15	76	9	6	21	67	12	9	6	94	0	6		
Expected Oil Prices									18	44	38	-21		
Expected Natural Gas Prices									36	48	15	21		
Expected Natural Gas Liquids Pri	ces								15	70	15	0		

*Percentage may not add to 100 due to rounding.

^Diffusion Index. The diffusion index is calculated as the percentage of total respondents reporting increases minus the percentage reporting declines.

Note: The first quarter survey ran from March 17, 2025 to March 31, 2025 and included 34 responses from firms in Colorado, Kansas, Nebraska, Oklahoma, Wyoming, northern New Mexico, and western Missouri.

Table 2 Historical Energy Survey Indexes

	01'22	02'22	03'22	04'22	01'22	02'22	03,33	04'22	01'24	02'24	02'24	04'24	01'25
Versus a Quarter Ago	Q1'22	Q2'22	Q3'22	Q4 2 2	Q1'23	Q2 23	Q3 23	Q423	Q1 24	QZ 24	Q3 24	Q4 24	Q125
(not seasonally adjusted)													
Drilling/Business Activity	29	57	44	6	-13	-19	-13	-33	-13	-14	-13	-13	6
Total Revenues	38	87	25	-8		-42	13	-13	0	-10			
Capital Expenditures	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a	n/a		
Supplier Delivery Time	-9	10	-3	-11		-21	-10	-3	-16	-13	-3		
Total Profits	44	68	29	-17	-26	-39	-3	-19	-6	-13	-6	-23	
Number of Employees	39	42	47	38	6	27	13	13	18	3	19	19	21
Employee Hours	41	39	37	41	6	18	6	0	3	13	-3	13	12
Wages and Benefits	56	58	61	59	42	27	35	32	48	27	19	39	50
Access to Credit	25	16	6	6	0	3	-3	-6	-3	13	6	3	6
Versus a Year Ago													
Drilling/Business Activity	52	77	78	56	17	-16	-23	-33	-26	-25	-29	-16	-18
Total Revenues	72	90	87	67	-10	-48	-23	-17	-6	-21	-42	-39	-3
Capital Expenditures	63	71	71	65	26	0	6	6	-21	-20	-9	13	-9
Supplier Delivery Time	-3	23	6	-5	10	-45	-6	-23	-39	-28	-13	-16	-3
Total Profits	75	81	84	61	3	-48	-26	-17	-13	-10	-26	-19	-9
Number of Employees	66	55	61	56	26	39	23	43	34	24	26	13	24
Employee Hours	63	55	50	57	26	21	3	20	13	14	-10	10	6
Wages and Benefits	84	77	87	89	77	58	77	73	69	72	71	68	71
Access to Credit	38	19	27	3	6	6	-3	0	3	14	6	10	9
Expected in Six Months													
(not seasonally adjusted)													
Drilling/Business Activity	42	50	25	19	-13	-22	7	7	-10	21	-3	13	21
Total Revenues	53	55	27	11	-26	3	42	23	13	28	-3	-3	15
Capital Expenditures	63	52	52	49	-6	-9	16	7	-19	14	13	3	18
Supplier Delivery Time	9	16	-10	-19	-23	-42	0	-13	-13	-4	-6	0	9
Total Profits	38	35	39	6	-23	-3	23	3	3	24	29	-10	
Number of Employees	47	42	42	38	13	12	19	40	25	28	35	19	18
Employee Hours	41	32	27	30	13	3	3	27	13	14	10		-
Wages and Benefits	72	63	65	70		24	52	55	31	34	45		
Access to Credit	19	6	7	3		3	-3	-3	10	0	10		
Expected Oil Prices	-16	-6	20	62		42	32	32	31	14	16		
Expected Natural Gas Prices	0	10	-10	-3		53	50	-16	45	86	56		
Expected Natural Gas Liquids Prices	19	0	21	22	20	31	37	-7	16	41	45	13	0
Special Price Questions													
(averages)													
Profitable WTI Oil Price (per barrel)	\$62	\$65	\$61	\$64	\$64	\$63	\$64	\$64	\$65	\$64	\$65	\$62	\$65
WTI Price to Substantially Increase Drilling	\$86	\$98	\$102	\$89	\$86	\$86	\$90	\$84	\$90	\$91	\$89	\$84	\$85
WTI Price Expected in 6 Months	\$96	\$109	\$88	\$83	\$75	\$75	\$91	\$76	\$81	\$79	\$73	\$70	\$67
WTI Price Expected in 1 Year	\$89	\$102	\$89	\$86	\$81	\$79	\$88	\$79	\$83	\$80	\$77	\$71	\$69
WTI Price Expected in 2 Years	\$83	\$88	\$90	\$88	\$86	\$83	\$88	\$84	\$85	\$83	\$80	\$75	\$72
WTI Price Expected in 5 Years	\$84	\$86	\$93	\$88	\$90	\$88	\$93	\$88	\$90	\$88	\$86	\$81	\$79
Profitable Natural Gas Price (per million BTU)	\$3.72	\$4.64	\$4.42	\$4.32			\$3.45						
Natural Gas Price to Substantially Increase Drilling	\$4.53	\$6.34	\$7.65		\$4.74		\$4.36						
Henry Hub Price Expected in 6 Months	\$4.45	\$7.06	\$7.46	\$5.01			\$3.06						
Henry Hub Price Expected in 1 Year	\$4.32	\$6.65	\$6.48	\$5.52			\$3.34						
Henry Hub Price Expected in 2 Years	\$4.29	\$6.06	\$6.16	\$5.78			\$3.97						
Henry Hub Price Expected in 5 Years	\$4.74	\$5.77	\$6.51	\$6.19	\$4.51	\$3.98	\$4.83	\$3.96	\$3.58	\$3.86	\$3.68	\$3.98	\$4.78

Selected Energy Comments

"Lots of uncertainty on tariffs and overall economy."

"Manufacturing capacity takes years to put online. No choices currently for large diameter pipe."

"It is great to finally see some strength in the natural gas market."

"Fundamentals don't seem to affect the prices like they once did, little regard for storage numbers or lack of new discoveries."

"Slowing demand due to slowing economy and flattening of production growth driven by lower unit sales prices and increasing cost of supply."

"Softening of the economy in near term leads to lower energy prices."

"High demand and inflation pushing up development costs."

"Increase in electricity demand will require more natural gas."

"Growing base load power demand and increasing LNG export capacity. Reduced oil growth will reduce associated gas supply to support price."

"Production growth matching new demand from LNG and electric generation. If supply response to higher pricing outpaces current expectations, we will see some weakness."

"Production of dissociated natural gas in West Texas and NM will continue to keep natural gas rig count suppressed."

Additional Resources

Current Release

Download Historical Data

About the Energy Survey

Authors



Megan Williams Associate Economist and Senior Manager

Megan Williams is Associate Economist and Senior Manager in the Regional Affairs department at the Kansas City Fed's Oklahoma City Branch office. In this role, she is responsible for current monetary policy research, district economic surveys, and a variety of economic research projects. She also serves as Secretary for the Oklahoma City Branch Board of Directors.Williams joined the Federal Reserve Bank in 2000 as an Analyst in the Retail Payments Support department, and assumed her current role in March 2006.She holds a bachelor's degree in Finance from Oklahoma State University and a MBA degree from the University of Oklahoma.Williams serves on the Board of Directors of the Oklahoma Council on Economic Education and is a former Board Chair. She lives in Choctaw, Oklahoma, with her husband and two children.



Chase Farha

Research Associate

Chase Farha is a Research Associate in the Regional Affairs department at the Oklahoma City branch of the Federal Reserve Bank of Kansas City. In this role, his responsibilities include contributing to the Oklahoma Economist and a variety of research projects. He holds a Bachelor of Science degree in Economics, with minors in mathematics and Arabic, from Tulane University.

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF JOHNSON)

I, Afissa Greenwald, being first duly sworn upon my oath state that I am an attorney for the Council for the New Energy Economics; that I have read and am familiar with the foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief under the penalties of perjury.

Danny Bishop II Notary Public - State of Kansas My Commission Expires: 2/3/02/6 Alissa Greenwald	ple
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SUBSCRIBED AND SWORN to before me on this 5th day of Mary, 2025.

Notary Public

My Commission expires: 2/3/2026

CERTIFICATE OF SERVICE 25-EKCE-207-PRE

I, the undersigned, hereby certify that a true and correct copy of the foregoing document was served via email on May 5, 2025, upon the following:

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