

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

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

**EVERGY RESPONSE IN OPPOSITION TO POST-JOINT FILING COMMENTS
OF THE COUNCIL FOR THE NEW ENERGY ECONOMICS**

COMES NOW, Eversource Energy Kansas Central, Inc. (“Eversource Energy Kansas Central”) and Eversource Energy Metro, Inc. (“Eversource Energy Kansas Metro”) (together referred to as “Eversource Energy”) and files with the Kansas Corporation Commission (“Commission”) this response to the Post-Joint Filing Comments submitted in this docket on December 13, 2024, by The Council for the New Energy Economics (“NEE”). For its response, Eversource Energy states as follows:

1. In its Post-Joint Filing Comments, NEE reiterates its substantive concerns related to the natural gas price forecast methodology utilized in Eversource Energy’s 2024 Triennial Integrated Resource Plan (“IRP”), which NEE identifies as “NEE Deficiency 7.”¹ NEE’s Post-Joint Filing Comments also request that the Commission “abstain from making a determination on NEE Deficiency 7” and “refer the issue for further adjudication in Eversource Energy’s pending Predetermination Docket.”²

2. Although the precise nature of NEE’s “abstain and refer” request is unclear, Eversource Energy opposes the request to the extent NEE is suggesting the Commission should stay this docket pending resolution of the Predetermination Docket or is asking the Commission to join any portion of this docket with the Predetermination Docket.

¹ See NEE October 14 Comments, p. 18.

² See Post-Joint Filing Comments of the Council for the New Energy Economics (Dec. 13, 2024), p. 2.

3. Evergy acknowledges that matters related to the 2024 IRP may be relevant in the Predetermination Docket and recognizes that the Commission may receive evidence probative of such matters in that proceeding. However, the mere fact that the 2024 IRP may be relevant in both this docket and the Predetermination Docket does not give grounds for NEE’s joinder request. To be sure, this docket and the Predetermination Docket should be adjudicated separately as the two dockets serve different purposes and involve different standards of review, different issues and proofs, and different procedural frameworks.

4. The question presented in this docket is narrow: Whether the 2024 IRP complies with the structure and expectations outlined in the Capital Plan Reporting and IRP Process Framework (“IRP Framework”) adopted by the Commission in Docket No. 19-KCPE-096-CPL.³ Allegations of substantive IRP deficiencies are beyond the scope of this docket.⁴

5. Evergy stands firm in its exception to NEE Deficiency 7. As set out in its December 13, 2024 responsive filing:

Evergy does not agree this is a deficiency within the Kansas Framework, nor is a hearing necessary for resolution. Evergy evaluated natural gas price risk in the IRP. In addition to a base forecast, Evergy incorporated high and low natural gas price scenarios based on EIA Annual Energy Outlook long-term forecasts that consider long-term fundamental factors influencing natural gas supply, demand and prices. All three scenarios were used in the economic evaluation of the resource plans in the IRP. The purpose of this process is to determine whether Evergy’s 2024 IRP met the requirements of the IRP Framework, and this issue is outside that scope. Staff comments conclude that “Evergy’s 2024 IRP is consistent with the IRP Framework adopted in 2020.”⁵

³ *Order Approving IRP and Capital Plan Framework*, Docket No. 19-KCPE-096-CPL (Feb. 6, 2020), Attachment A, p. 4.

⁴ *Id.*

⁵ Evergy Response to Alleged Deficiency, Docket No. 24-EKCE-387-CPL (Dec. 13, 2024), p. 2.

WHEREFORE, Evergy respectfully requests the Commission (1) deny the relief NEE requests in its Post-Joint Filing Comments; (2) find Evergy's Triennial 2024 IRP meets the requirements of the IRP Framework; and (3) close this docket.

Respectfully submitted,

/s/ Cathryn J. Dinges _____

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VERIFICATION

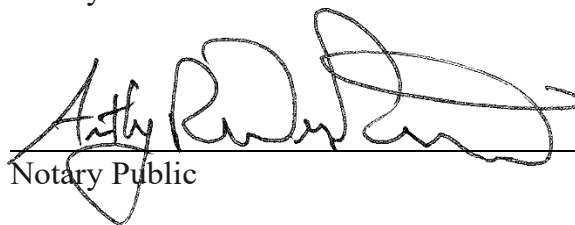
STATE OF MISSOURI)
) ss:
COUNTY OF JACKSON)

Cathryn J. Dinges, upon oath first duly sworn, states that she is Senior Director and Regulatory Affairs Counsel for Evergy Kansas Central, Inc. and Evergy Kansas South, Inc., that she has reviewed the foregoing pleading, that she is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of her knowledge and belief.


Cathryn J. Dinges

Subscribed and sworn to before me this 19th day of December 2024.




Notary Public

My Appointment Expires: 4/26/2025

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above was electronically served, hand-delivered or mailed, postage prepaid, this 19th day of December 2024 to:

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