# BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Compliance Docket related to	)	
the Investigation into the Sustainability	)	
Transformation Plan of Evergy Metro, Inc.,	)	Docket No. 22-EKMECPL
Evergy Kansas Central, Inc., and Evergy Kansas	)	
South, Inc. (collectively Evergy) Pursuant to the	)	
Commission's Order in Docket No. 21-EKME-	)	
088	)	

## JOINT INFORMATIONAL FILING OF EVERGY METRO, INC., EVERGY KANSAS CENTRAL, INC., EVERGY KANSAS SOUTH, INC. AND COMMISSION STAFF

COME NOW Evergy Metro, Inc. ("Evergy Kansas Metro"), Every Kansas Central, Inc. and Evergy Kansas South, Inc. (together as "Evergy Kansas Central") (collectively referred to herein as "Evergy" or the "Company") and the Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission", respectively) submit this Joint Informational Filing regarding reporting requirements related to the Sustainability Transformation Plan ("STP").

1. As the Commission noted in its recent Order in Docket No. 21-EKME-088-GIE (the "STP docket") issued on November 23, 2021, Staff's comments in the STP docket included a suggestion that Evergy report to the Commission regarding its execution of the proposed STP system improvements. Specifically, the Commission stated:

The Reporting requirements recommended in Staff Comments on STP and Topics Addressed During Commission Workshops are adopted. Evergy is directed to quarterly report its Board and senior management level Key Performance Indicators in a compliance docket and annually provide a more comprehensive report tracking the granular execution level KPI to allow the Commission to evaluate whether Evergy is executing its STP successfully, and making progress towards regionally competitive rates and reliable electric service. <sup>1</sup>

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<sup>&</sup>lt;sup>1</sup> Order, Docket No. 21-EKME-088-GIE, Ordering Paragraph B (Nov. 23, 2021). Additionally, Ordering Paragraph A states "[i]n its next Capital Plan filing, Evergy is directed to explain the increased spending in its CapEx projections, and the impact that increased spending will have on the trajectory of rates[,]" and Evergy will make those filings as directed.

The Commission indicated that Evergy should file this information in a new compliance docket.

- 2. With respect to reporting of board and management level Key Performance Indicators (KPIs), Evergy will submit those as generally described in paragraph 88 of Staff's Initial Comments in Docket No. 21-EKME-088-GIE on a quarterly basis and those as generally described in paragraph 89 of Staff's Initial Comments on an annual basis. To the extent that Evergy changes the metrics that are being reported to senior management and its board of directors, Evergy will adjust the information provided in these compliance filings accordingly.
- 3. With respect to the annual report contemplated by Staff's comments and the Commission Order that would help evaluate whether Evergy is executing the STP successfully, Evergy has been working with Staff over the last several months to gain a better understanding of Staff's intent regarding an STP reporting structure. Based on these discussions, it became clear that one of Staff's focus areas is the distribution investments contemplated in the STP and how to identify specific improvements in reliability resulting from those investments.
- 4. Evergy and Staff have developed a proposed reporting framework that focuses on reliability benefits and investments at the distribution project level. The framework proposed includes identifying the specific project with a description of the work, location by distribution circuit, investment amount, the number of customers directly impacted by the project, timing, the number of customer interruptions (CI), the number of customer minutes interrupted (CMI) and three reliability performance metrics System Average Interruption Duration Index (SAIDI), System Average Interruption Frequency Index (SAIFI), and Customer Average Interruption Duration Index (CAIDI). Reliability data will be provided prior to and after the upgrade to show improvements over time. An illustrative report using this framework is attached hereto as Exhibit A.

- 5. Performance metrics will be at the project level for this reporting framework. Overall system reliability metrics are currently provided annually in other compliance filings. The three performance metrics will provide meaningful details on reliability improvements for customers that are connected to the identified distribution circuits.
- 6. Reporting at the circuit level will allow the appropriate level of detail that will be meaningful to Evergy customers. The level of detail on cost and reliability improvements will provide stakeholders meaningful information on the value of distribution investments. This will enable stakeholders to evaluate the benefits of the investments and the service level improvements to customers.
- 7. Evergy has held meetings with stakeholders to present the proposal, seek feedback, and address concerns.
- 8. Staff and Evergy have agreed that the report will be filed annually by the end of July, beginning in 2022.
- 9. Staff and Evergy have agreed that this annual report utilizing the framework described above will satisfy Staff's recommendation for annual and quarterly reporting that helps evaluate Evergy's success in executing the STP. Thus, Evergy and Staff are submitting this Joint Informational Filing to inform the Commission of the structure of the planned reporting for the STP in the future.

### Respectfully submitted,

### |s| 7erri Pemberton

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#### ATTORNEY FOR COMMISSION STAFF.

## |s| Cathryn J. Dinges

Cathryn J. Dinges, #20848 Senior Director and Regulatory Affairs Counsel 818 South Kansas Avenue Topeka, Kansas 66612 Telephone: (785) 575-8344 Cathy.Dinges@evergy.com

ATTORNEY FOR EVERGY METRO, INC., EVERGY KANSAS CENTRAL, INC., AND EVERGY KANSAS SOUTH, INC

#### **VERIFICATION**

STATE OF KANSAS	)
	) ss
COUNTY OF SHAWNEE	)

The undersigned, Cathryn Dinges, upon oath first duly sworn, states that she is Corporate Counsel for Evergy Metro, Inc. 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 Dinges

Subscribed and sworn to before me this 11th day of January 2022.

1 total y 1 total

My appointment expires: May 30, 2021

NOTARY PUBLIC - State of Kansas

LESLIE R. WINES

My Appt. Exp. 5/30/2/

#### \*\*DRAFT \*\*For Discussion Purposes Only\*\* Actual Data May Change in The Actual Report\*

**DRAFT ** FOI DISCU	ssion Purposes Only · · Actual Data May Change	in The Actual	(eport**																																			
Project Name	Description	Length OnCo	Center	Ckt/Fuse	Upgrade In	Cost	2017 SAIDI	2018 SAIDI 2	019 SAIDI 20	2021 120 SAIDI SAIDI		2018 2 SAIFI S	019 2020 AIFI SAIFI	2021 YTD SAIFI	2017 CMI 20	18 CMI 2019 I	CMI 2020 CM	2021 YTD	2017 (1 201	8 CI 2019 CI	202 2020 CL YTD	L 2017	2018 2 CAIDI C		020 202 AIDI CAII	Avg monthly Average momenthly CMI monthly CMI monthly CIM control CI After Aft	rage nthly i or uild Customer Types	2017 YE Customer Count	2018 YE Customer Count	2019 YE Customer Count	2020 YE Customer	2021 YTD Customer Count	CMI Before (2017- (Rebuild)	CI Before CA 2017- (20 Rebuild) Re	IDI Before CM 017- (Re build) YTE	II After CI		CAIDI After (Rebuild- YTD)
12kv - Rebuild along Halstead from 30th to approximately 23rd street	About 1/2 mile rebuild. Existing conductor is #6 copper. This circuit can be used as back-up to the			43L0012002,																							Commercial,							,,	,	,		
(43LO 12-6).	hospital. Rebuild 3 miles of 4/0 ACSR and 2/0 ACSR with 477	EKC	Hutchinson	43LO012006	10/27/2020	296400.19	42.95	181.24	47.91	71.11	35.58 0.56	1.61	0.51 1.7	0.47	128,291	543,163 144,7	738 214,897	93,785	1,681 4,	336 1,533	5,140 1,2	76.32	112.32	94.41	41.81	5.82	Residential	2,987	2,997	3,021	3,022	2,636	1,005,665	12,780		119,209	1,647	
12kv - Rebuild on Broadway from 53 to 77th	rd ACSR. This project will improve voltage and switching options in the area.	EKC	Wichita	GRNT012002	7/9/2020	1174672.69	25.08	109.14	72.02	73.15	6.45 0.24	1.23	1.40 0.6	3 0.14	24,152	106,416 71,	156 72,715	5 3,814	229 1,	195 1,388	626	32 105.47	7 89.05	51.27	116.16	6.51	Commercial, Residential	963	975	988	994	591	203,698	2,823		74,555	697	
12kv - Waverly 12-24 Rebuild 4 Mile	s Rebuild 4 mile of Waverly 12-24.	EKC	Emporia	WAVE012024	5/22/2020	7571343.66	191.23	316.14	238.41	3.54	0.56 2.83	1.78	1.17 0.0	3 0.02	18,932	31,298 23,	841 354	4 46	278	176 117	3	2 68.10	177.83	203.77	118.00	3.00	Commercial, Residential	99	99	100	100	82	74,176	572		295	4	
	Add 25Mva Xfmr and build 2 circuits to the east. One to 127th then south to 21st, most of this circuit																															l .						
	already exists, a get-away is needed and tying in at 127th St. Another circuit is needed along 29th to 143rd then south to 21st, 2.5 miles of construction is																															l .						
29th St Sub - Add Transformer and 2	needed the existing conductor is small and or single	EKC	Wichita	29TH012012,	9/24/2020	1949049 16	13 54	5.40	27 68	2.84	69.07 0.33	0.06	0.53 0.0	3 0.48	41 704	17.088 891	634 9.083	218 744	987	188 1 705	86 15	23 42 25	90.89	52 57	105.62 14	13.63	Residential	3 081	3 165	3 238	3 203	3 167	157 459	2 964		218 794	1 525	
	Multi-year project (portion in bold was completed				3,2 1,202		2007								,					.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,									3,223	,,,,,,,,		1	-51,100	-,,,,,			-70-0	
	in 2020): Remove ~20 miles of 34.5 kV line. from county line south along loop to tap off east of general																															l .						
	foods. build 2 circuits out of educ to water works and remove waterworks sub. Install tx at 2nd & madison																															l .						
	and build 2 circuits to NE, and remove division and lake sub. also remove 13th and mad sub. remove			DIVL012003,																												l .						
	69/34 at deer creek. remove grantville sub and built 12kv tie from county line circuit to pickup grantville			DIVL012002, DEER340330,																							Commercial,					l .						
2nd & Madison - Convert 34kv Syste		EKC	Topeka	2MAD012042	5/11/2020	1292437.77	62.72	124.26	124.38	73.42	2.35 1.13	0.87	0.46 1.0	5 0.03	77,271	153,212 153,7	734 90,743	6,372	1,380 1,	071 574	1,300	93 55.99	143.06	267.83	69.80	8.52	Residential	1,232	1,233	1,236	1,236	2,714	468,297	4,171		13,035	247	
34/12kv Load Center - Smolan - 7.5Mva	The Smolan transformer is in poor condition and overloaded about 15% during the summer peak.	EKC	Salina	SMOL EEUR344588.	6/11/2020	1017686.26	290.58	73.33	187.24	44.78	3.95 1.62	0.94	2.60 0.4	3 0.05	219,966	55,727 142,6	34,125	5,260	1,223	716 1,985	325	71 179.86	77.83	71.88	105.00	4.08	Commercial, Residential	757	760	762	762	1,331	434,924	4,025		22,834	295	
				EEUR344588, EEUR012026, ONCY012002.																												l .						
34kv - EEUR to Toronto/Toronto WB				FRLC012002, FALL, TWMB,																							Commercial					l .						
Pole replacements  34kv - Jaggard to Tongie City Sub	Pole replacements Multi year 18,19,20. Rebuild 4 miles west of 158th on Metro. This is a	EKC	Emporia	TORO	9/17/2020	788402.3	286.25	424.93	149.64	82.28	14.03 1.62	1.58	2.23 0.7	4 0.11	648,357	969,263 343,5	570 189,572	24,628	3,658 3,	507 5,122	1,705 19	177.24	268.72	67.08	111.19 1	16.95	Residential Commercial.	2,265	2,281	2,296	2,304	1,756	2,071,138	13,391		104,252	895	
Rebuild 34ky - Tescott Jtn North - Rebuild 4	backup to Tongie City Sub.	EKC	Shawnee	TONT	12/17/2020	4063625.31	104.63	58.65	23.34	30.80	26.18 0.88		0.45 0.4	4 0.49	119,488	67,453 27,	36,380	0 25,288	1,005	989 516	524 47	7 118.89	68.20	52.37	69.43	3.01	Residential	1,142	1,150	1,158	1,181	966	249,693	3,012		25,940	499	
miles, Phase 3 34kv - West Emporia to Hatcher Ste	This is the next phase of rebuilding the 34kv line.  Replace leaning poles in the rail yard just south of the	EKC	Salina	SALM341900	12/8/2020	225536.11	357.00	899.00	373.00	855.00	- 4.00	2.00	2.00 5.0	0 -	357	899	373 855	5	4	2 2	5	89.25	449.50	186.50	171.00		Residential	1	1	. 1	1	1	1,629	8		855	5	
Poles at RR.	packing plant with steel poles.  Convert Prescott from a pole mounted to Padmount	EKC	Emporia	WEMP344485	10/12/2020	1304327.64		216.00	38.00	245.00		2.00	1.00 1.0	0 -		216	38 245	5		2 1	1		108.00	38.00	245.00		Commercial,	1	1	. 1	1	1	499	4				
Padmount Distribution Improvement	substation Lateral Improvement	EKM EKM	Paola JOCO	47611, 47612 F987961TS		492146.47 228458	1.95	96.32 46.25			93.00	1.09	4.30 4.8 0.19 1.1		300		507 140,611 143 12,689		2	90 15	741 27 87	3 149.88 78 #DIV/01	88.10 40.08		189.76 145.85	3.00	Residential Residential	154 78	150 78	153	153 78	151 78	222,467 3,751	1,561 105		18,994 19,943	277 165	
	Install 25Mva 138/12kv Xfmr with PCC. Install 138kv breakers, there is about 65MW of load served by the substation.																																					
	Move 12-16 to the new PCC and build a new 12kv circuit to the east about 1 mile, tie this new circuit into the existing 12-4 just east of W012-05327.																																					
	The 3 existing Interstate transformers will be near or																															l .						
	over their ratings and this is an area that has the potential for large spot load additions, also 2 of the																															l .						
Interstate Sub - Install New 138-12k	circuits will have over 13MW of load. MacArthur Sub V TX-1 is near its rating with a circuit of over 13MW,			INTE, MACA012008,																							Commercial,					l .						
XFMR and 138kV Breakers Distribution Improvement	these will also be relieved. Lateral Improvement	EKC EKM	Wichita JOCO	MACA012006 J10637	6/10/2020 12/2/2020	66492.91 186685	34.50 60.34	33.54 119.59	56.55 61.91	39.91 232.98	54.45 0.44 102.00 1.08	0.32 3 1.49	0.49 0.4 0.98 2.9	1.00	3.560	7,056 3,5	591 13.746	5.916	64	88 57	3,184 3,1 174	53 77.66 58 55.63	105.52 80.18	115.96 63.00	91.63 11 79.00 10	16.19 12.00	Residential Residential	7,064 59	7,084 59	7,093	7,311 59	7,307 58	973,946 27,953	10,067 383		598,110 5,916	5,119 58	
Distribution Improvement Distribution Improvement	Lateral Improvement Lateral Improvement	EKM	1000	J10638 J14127	1/1/2020 2/12/2020	105208 105043	684.64	275.95 43.77	311.25 139.24	271.92 298.42	91.41 1.97 146.38 -	0.98	4.31 4.0 2.40 2.7	0 1.66 6 2.04	47,240	18,765 21, 2,101 6,5	165 18,490 544 14,622	0 6,216 2 7,026	136	89 293 47 113	135	3 347.35	44.70	72.24 57.91	67.98 108.31	1.69	Residential Residential	69 47	68 48	68	68 49	48	87,170 8,645	518 160		24,706 21,648	385 233	
Kenilworth SWGR #1 Distribution Work	Substation has a project, BND0137, to replace SWGR #1 at Kenilworth Substation.	EKM	лосо	5014, 5013, 5012, 5011	5/15/2020	132286.55	200.11	41.63	77.96	43.24	0.75 1.14	0.85	0.59 0.7	7 0.02	287,760	59,733 112,1	105 62,004	4 1,076	1,636 1,	216 852	1,105	175.89	49.12	131.58	56.11	9.85	Commercial, Residential	1,438	1,435	1,438	1,434	1,434	472,727	3,864		49,951	972	
	Install a 25Mva 138-12kv Xfmr with switchgear. One circuit heading north 1/2 mile to 53rd and tying into																															l .						
	the existing circuit, then re-conductor on 53rd from Tyler to Ridge (4/0 to 477). Another circuit heading																															l .						
Maize Sub Expansion - Install XFMR	south to 45th St about 1/2 mile then going west and																										Commercial					l .						
and 2 circuits.	Capacity in the Meretex Caves is low. Needed for load	EKC	Wichita	MAIZ	6/10/2020	1451994.85	12.40	22.10	46.39	35.74	57.74 0.14	0.47	0.42 0.1	1 0.32	70,502	136,354 298,5	96 234,782	386,859	768 2,	906 2,680	741 2,1	91.80	46.92	111.42	316.84 1	13.17	Residential Commercial,	5,685	6,169	6,437	6,569	6,700	531,521	6,581		595,572	2,626	
New Lenexa Circuit	growth in Lenexa.  Contingency for the surrounding circuits especially	EKM	JOCO	2941, 2953	6/23/2020	1103961.6	23.02	16.43	7.09	45.70	58.31 0.16	0.21	0.09 0.5	8 0.72	31,816	25,891 11,	240 130,780	137,680	221	325 139	1,664 1,7	143.96	79.67	80.86	78.59	0.70	Residential	1,382	1,576	1,585	2,862	2,361	87,216	763		250,191	3,292	
	those that cross over I-35. Without this project we will continue to have capacity issues at the load			4712, 4754,																												1						
New Overland Park Circuit for 87th/Goddard Load Center	center and have little to no contingency in case of a failure.	EKM	1000	4751, 4731, 4733	8/18/2020	971752.3	20.77	44.90	13.43	108.75	30.49 0.17	0.56	0.15 1.3	4 0.31	78,276	169,039 50,	648 416,741	117,710	626 2,	116 563	5,133 1,1	8 125.04	79.89	89.96	81.19	8.26	Commercial, Residential	3,769	3,765	3,772	3,832	3,861	524,208	6,962		308,206	2,674	
	Bring a new circuit south from the #3 Xfmr in SW Lawrence Sub to N 1200 Rd. This will split an																																					
SW Lawrence - New Circuit - Split 12 16	extremely long circuit with poor reliability into 2 parts.	EKC	Lawrence	SWLA012016, SWLA012032	11/30/2020	1008472.68	397.69	131.83	147.66	41.61	22.83 1.79	1.14	0.58 0.4	7 0.19	769,130	260,764 297,8	84,217	7 48,862	3,469 2,	252 1,178	953 40	3 221.72	115.79	252.83	88.37 1	11.25	Commercial, Residential	1,934	1,978	2,017	2,024	2,140	1,399,727	7,778		61,083	477	
	Upgrade 34 kV equipment at Vaughn substation. This would include replacing all existing oil breakers, existing wood structure which is in poor condition, and associated switches and bus work. The grounding TV should also be evaluated to determine																																					
Vaughn Substation 34kV Upgrades	its health. There are also 3 station power TX's that need to be replaced and reconfigured.	EKC	Emporia	VAUG	11/10/2020	347714.12	187.08	187.68	105.56	243.89	79.02 1.86	1.22	1.03 1.4	2 0.34	81,378	82,015 46.	130 106,578	3 28,368	811	532 448	619 11	3 100.34	154.16	102.97	172.18 2	10.63	Commercial, Residential	435	437	437	437	359	316,101	2,410		28,368	123	
	The second with recommended.	ZNC	Lingund	, 1700	11/10/1020	347714.12	207.00	107.00	203.30	243.03	1.00		1.03   1.4		31,370	,010   40,	100,370					200.34	., 134.101	102.57			nearement	433	437	437	73/		, 310,101	2,720		20,500		

\*SAIFI and SAIDI metrics pro exclude "Planned Outages".