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 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

TESTIMONY OF ANNA SOMMER

ON BEHALF OF

NATURAL RESOURCES DEFENSE COUNCIL

PUBLIC VERSION

March 14, 2025

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I. INTRODUCTION & QUALIFICATIONS

Q. Please state for the record your name and business address.

A. My name is Anna Sommer. My business address is 91 Main Street, Canton, NY 13617.

Q. By whom are you employed and in what position?

A. I am a Principal at Energy Futures Group ("EFG"). Energy Futures Group is a clean-energy consulting firm headquartered in Vermont with a satellite office in Canton, New York. EFG provides specialized expertise in integrated resource planning, resource adequacy studies, and generator procurement as well as energy efficiency program design and policy, and related topics.

Q. On whose behalf are you testifying in this proceeding?

A. I am testifying on behalf of the Natural Resources Defense Council ("NRDC").

Q. Please describe your educational background.

A. I hold a B.S. in Economics and Environmental Studies from Tufts University and an M.S. in Energy and Resources from University of California Berkeley. I have also taken coursework in data analytics at Clarkson University and in Civil Engineering and Applied Mechanics at McGill University and participated in the U.S. Department of Energy-sponsored Research Experience in Carbon Sequestration.

Q. Please describe your professional background.

A. I have over 20 years of experience in the energy sector. During that time, I have reviewed over one hundred integrated resource plans ("IRPs") and related planning exercises in

jurisdictions all over the country and in Canada. I have reviewed planning modeling based on multiple models including Aurora, Capacity Expansion Model, EnCompass, PLEXOS, PowerSimm, PROSYM, PROMOD, SERVM, and System Optimizer, and have had formal training on the Aurora, EnCompass, PowerSimm, and Strategist models. Our firm has licensed or is currently licensing Aurora, EnCompass, PLEXOS, SERVM, and Strategist. I have provided expert testimony on resource planning and certificate of need applications in front of utility commissions in Indiana, Kentucky, Michigan, Minnesota, Montana, New Mexico, North Carolina, Puerto Rico, South Carolina, South Dakota, and West Virginia. A copy of my resume is attached as Exhibit NRD-1.

Q: Have you previously filed expert witness testimony in other proceedings before the Commission or before other regulatory commissions?

A: While I have not filed before this Commission previously, I have filed testimony before Commissions in Indiana, Kentucky, Michigan, Minnesota, Montana, New Mexico, North Carolina, Puerto Rico, South Carolina, South Dakota, and West Virginia.

Q. Are you sponsoring any exhibits?

A. Yes, I am sponsoring Exhibit NRD-1: Resume of Anna Sommer.

II. TESTIMONY OVERVIEW

Q. What is the purpose of your testimony?

A. The purpose of my testimony is provide certain recommendations to the Commission to enhance the record before it as it moves forward in considering future pre-determination, IRP and other cases filed by Evergy.

Q. What are your recommendations?

A. My recommendations are as follows:

1. Evergy should be directed to include consideration of additional demand-side management, surplus interconnected resources, and novel projects such as Grain Belt Express in its next IRP. It should also be directed to consider the impact of higher capital costs on resource selection.
2. Evergy should be directed to demonstrate that its large load tariff filing aligns with likely capital, operation, and transmission costs caused by those customers.
3. Evergy should be required to give the Commission quarterly updates on its large load pipeline including the load expected, status of studies of and negotiations with customers, and likely ramp and online dates.
4. Evergy should be directed to demonstrate for the Commission that its large load interconnection process accounts for the grid reliability risks outlined in the GridLab working paper cited in my testimony.

III. IMPLICATIONS OF THIS PETITION ON FUTURE FILINGS

Q. What relief does the petitioner seek in this docket?

A. Evergy requests "a determination of the ratemaking principles and treatment that will apply to the recovery in rates of the costs to be incurred in constructing and acquiring a stake in two new combined cycle gas-fired generating facilities and one solar facility."[1] Put simply, Evergy seeks authorization to recover what is known as construction work in progress

[1] Application at page 1.

related to a 50% portion of each of two 710 MW combined cycle and one 159 MW solar project.

Q. Were these projects part of Evergy's preferred plan in its 2024 IRP?

A. Not precisely. While Evergy's 2024 IRP preferred plan included 750 MW of solar by 2030, it's plan called for 325 MW of CC capacity in each of 2029 and 2030 followed by 650 MW of CC capacity in 2031.

Q. What cost did Evergy assume for these projects in its 2024 IRP?

A. Evergy assumed a build cost of $[redacted] per kW in 2029 and $[redacted] per kW in 2030. In the 2024 IRP, Evergy also tested a high sensitivity that it described as a 25% increase in capital cost[2], but this sensitivity was an "end-point" meaning that it was not tested for its impact on resource selection within the capacity expansion modeling instead it was used to create variance in potential PVRR outcomes for the different plans modeled. The Company's modeling in its direct case was the first time that the Company explored the impact of an increased CCGT cost on resource selection.

Q. Was it a surprise that the cost of the combined cycle projects would increase between the IRP and this filing?

A. No, an increase in cost was entirely expected. As NEE noted in its comments on Evergy's second IRP workshop and then in its comments on the IRP itself[3], Evergy's combined cycle capital cost assumption was materially low and out of line with assumptions from other utilities around the country.

[2] Evergy 2024 IRP Volume 5 at page 31.
[3] Available at https://estar.kcc.ks.gov/estar/ViewFile.aspx/S20241014162725102 2.pdf?Id=fa3d2c32-2a9b-4141-bf0c-dc9422a425b8.

Q. Did Evergy test the impact of changing the CC capital cost on the selection of the combined cycle projects in its Preferred Plan?

A. Partially. Evergy conducted one simulation[4] in which it changed only the CC capital cost[5] to $[redacted] per kW[6]. Evergy further updated this run with a new capital cost as discussed in the Supplemental Testimony of Cody VandeVelde. The impact of the change in cost was that PLEXOS selected only [redacted] MW of CC capacity in [redacted].[7] This is a reduction in total CC capacity from the 2024 IRP preferred plan of [redacted] MW during the 2029 – 2031 period.

Q. Does it appear that this modeling result has changed the Company's plans to acquire additional CCGT capacity in 2031 as outlined in the 2024 IRP preferred plan?

A. It's unclear. In a presentation to Commission Staff in [redacted] which predates these modeling results, the Company suggested that it would site a third CC at the location of the [redacted][8] In his supplemental testimony, Mr. VandeVelde suggests that the Company would still add incremental, unspecified capacity to its system after 2030 and delay retirements in order to serve new customers saying, "While there is ongoing analysis around these scenarios, and a more fulsome update will be included in EKC's 2025 IRP Annual Update, the results of the preliminary analysis show that EKC can meet incremental demand and resource adequacy requirements by revisiting flexible retirement plans and adding generation after 2030."[9]

[4] See the Company's response to CURB-026.
[5] See the Company's response to NRDC-003.
[6] See the Company's response to KCC_4R_CONF_New Resource Cost and Performance Updates CC CT 2025 Supplemental.
[7] See VandeVelde workpaper Conf. EKC Plan Selected with Updated NG Costs.
[8] See the Company's response CURB-2_CONF - Development Update for KCC Staff 10-14-2024.
[9] VandeVelde Supplemental Testimony at page 4.

Q. To what flexible retirement plans does the Company refer?

A. It would appear that Mr. VandeVelde is referring to some combination of the retirement of Lawrence 4 in 2028, Evergy's 1,349 MW share of Jeffrey 2 & 3 in 2030, and perhaps even its 375 MW share of LaCygne 1 in 2032.

Q. It would appear that Evergy's preferred plan trades off the retirement of these units for investment in new resources including new CCGTs. What are some of the factors that lead to that outcome?

A. In addition to relative costs of those resources, assumptions about load and expected reserve margin requirements figure prominently. While the IRP modeling supporting the application for these facilities did not have large amounts of new load in the load forecast, the modeling was predicated on an assumption that Evergy would hold a buffer of capacity over and above the current, mandated SPP reserve margin[10] in anticipation of changes to SPP's reserve margin construct. The summer reserve margin requirement rises from 15% in 2024 to 21% in 2030. The winter reserve margin rises from 30% in 2024 to roughly 37% in 2030.[11] This assumption undoubtedly influenced the results because with a total summer peak of about 5,000 MW the difference in reserve margin needed requires an additional 250 MW of capacity.[12]

[10] Evergy 2024 IRP Volume 5 at page 20.

[11] Each reserve margin requirement continues to increase at a slower pace thereafter.

[12] As Evergy indicated in its response to KCC-3, under its modeled reserve margin requirements it will hold 741 MW of excess capacity in the summer and 601 MW of excess in the winter. PLEXOS likely selected new capacity because of the JEC retirements that occur the following year, so the used and useful nature of these new units is very dependent on the commitment to retire significant, existing capacity.

Q. Does the 2024 IRP provide any information about the impact of extending the life of existing units on ratepayers?

A. There is some indication in the IRP results. Evergy has one plan in which it evaluated no plant retirements other than that of Lawrence 4 in 2028. That plan was derived under an assumption of low gas prices and no carbon price. But that plan was ranked across the Company's endpoints as [redacted] out of 13th in the overall plan rankings for Evergy Kansas Central and was approximately $[redacted] *more* expensive than Evergy's preferred plan.[13]

Q. What do these results tell the Commission?

A. Though the level of new load in Evergy's pipeline dwarfs the new load modeled in its last IRP, new load casts a long shadow across multiple topics that are currently pending or might come before the Commission. The introduction of large amounts of large loads has made the interlinkages between resource planning, rates, and prudence even more tightly connected.

More specifically and with respect to the IRP, since the option of delaying retirements that appear to otherwise reduce costs to customers is being touted as a strategy to meet new load, this raises questions about how costs should be allocated between new and existing customers. I understand that Evergy has filed a request to establish a large load tariff. I also understand that the rates given in that tariff are based, in part, on the cost of service study from its most recent rate case. However, without benefit of the ability to ask discovery of Evergy on these topics, I think significant questions remain including:

[13] Evergy Response to KCC-1_Updated Rankings Feb25 Costs.

1. How would Evergy allocate costs associated with extending the life of existing assets between new and existing customers?
2. If new customers took service from Evergy which resulted in plant life extensions, but then left Evergy's service territory or significantly reduced their demand, how would unamortized costs associated with plant life extensions be assigned to customers?
3. Is cost assignment based on a cost of service study the most fair and transparent way to assign costs to large load customers?

Q. Can you provide more clarity on why these cost allocation questions are so important to ask and have answers to?

A. Of course. Let's take #3 from my list first - the question of whether a cost of service study is the most fair and transparent way to assign costs to large load customers as an example. It would be my expectation that the cost of service study is only updated when Evergy files a rate case. Meaning that the loss of a large load customer or the addition of a customer does not in and of itself trigger a change in rates either for that customer or for other customer classes. If, for example, Evergy lost load from this class, but was over recovering with respect to its other rate classes, it may not have an incentive to file a rate case and adjust rates accordingly.

I think there is also a question of whether cost of service studies, which are typically voluminous and complex, are even needed in order to assign costs based on the principle of cost causation. Large loads tend to share a trait of many generators, i.e, that they are very blocky, which may make cost assignment, at least with respect to generator capital costs, an easier proposition.

Just as these new types of customers have suddenly appeared, we should assume there is a risk they will suddenly leave or reduce their demand. We've already seen this happen in our work as when initial estimates of demand were rolled back.[14] But there is also a major question of whether data centers, in particular, will become significantly more efficient and demand less energy in the future. It's not clear why a cost of service study would be the appropriate vehicle to assign costs given this uncertainty and the speed at which large load demand seems to change.[15]

These concerns also have implications for ratepayer protections in Evergy's large load tariff filing. For example, is a requirement for collateral in the amount of three years' worth of the customer's minimum bill sufficient to protect ratepayers especially if the new customer can seek a partial exemption from those requirements?[16]

To be clear, I support the transparency afforded by creating a tariff rather than a special contract to serve new, large customers, but I also hold the position that this tariff should be constructed with an eye to the realities of what mix of generators is likely to be added in order to serve those customers and to how dynamic those customers seem to be.

Q. What bearing does that position have on the instant docket?

A. As I stated previously, the interlinkages between IRPs, ratemaking, and prudence filings have become even tighter with the advent of many large loads. Evergy initially asked for pre-determination for 100% of the McNew project due to the possibility of adding new

[14] Schulz, J. (2025, January 9). *Microsoft pauses construction on portions of Mount Pleasant Project*. WPR. https://www.wpr.org/economy/microsoft-pauses-construction-on-portions-of-mount-pleasant-project

[15] I would also note that the cost of service study discussed in the Direct Testimony of Bradley Lutz in Docket No. 25-EKME-315-TAR appears to already be outdated in the sense that it assumes a CCGT cost of $1,573 per kW, which is much less than the current market bears.

[16] See Exhibit DBL-1 attached to the Direct Testimony of Bradley Lutz in Docket No. 25-EKME-315-TAR.

customers[17] while the question of rate recovery for new customers was outstanding and when there was no planning that included any forecast of additional new load from large customers in the late 2020s. I support putting those pieces into place but each needs to be tailored to the other pieces of the puzzle. If pre-determination is granted without the appropriate ratepayer protections and rate recovery in place the Company will be incentivized to add load to the detriment of existing ratepayers. If a wide set of expectations with respect to large loads is not tested in the IRP, there will likely be a mismatch between the planning conducted and the facts of the pre-determination case. I strongly encourage the Commission to use this case to establish requirements that will protect existing ratepayers, ensure optimal investment in Evergy's fleet, and maintain system reliability.

Q. What additional considerations would you flag for this Commission?

A. I would flag three concerns. One is that ratemaking questions extend beyond merely how capital recovery is allocated across customers. Many new customers are large enough to have material impacts on grid operations and, as a consequence, system costs. These can come in the form of increased operating and ancillary services costs, for example. Typically, increased load means increased market power prices and may even mean increased average fuel costs. If those costs are recovered through a fuel adjustment clause that merely averages these costs across all rate classes, we are ignoring the principles of cost causation to the detriment of existing ratepayers.

Second, we are in a new planning paradigm that is very different from that in which IRPs have traditionally operated. Normally, we think of supply-side planning as having

[17] Direct Testimony of Cody VandeVelde at page 19.

relatively little bearing on the load forecast instead the reverse would be true. But the scale and size of the new load in Evergy's pipeline[18] is very likely to upend that dynamic. If even a quarter of its 11.2 GW pipeline is added in Kansas before 2030, this raises serious questions about how that load would be served because Evergy is very unlikely to bring on new thermal assets before then given the demand for turbines and other critical components and because delaying existing plant retirements does not improve its pre-2030 portfolio position by all that much (only the retirement of 111 MW of LEC 4 could be pushed back). New wind, solar, and batteries could be brought online before 2030 and certainly contribute to system reliability and energy supply, but I would not expect those resources to support large customers with 90+% load factors on their own.[19] This means that having a well-informed understanding of the large load pipeline as well as the ability of Evergy's system to reliably serve new customers (both in IRP and resource adequacy terms) is critical. It also means that studying resources that may have been overlooked in prior IRPs is even more important. For example, Evergy should study multiple and higher levels of demand-side management in its next IRP. It should also study opportunities for surplus interconnection at existing generator locations.[20] And it should consider projects that it has previously ruled out such as the Grain Belt Express project. Finally, given the uncertainty

[18] Reuters Staff. (2025, February 27). Evergy's pipeline of power users like data centers jumps to 11.2 GW. *Reuters*. https://www.reuters.com/business/energy/utility-evergy-misses-fourth-quarter-profit-estimates-higher-costs-2025-02-27/

[19] Indeed, part of Evergy's proposed large load tariff would allow customers to bring their existing assets into Evergy's fleet to offset their needs, e.g. wind under virtual PPAs with counterparties such as Microsoft or Google. I would expect this to contribute to upward pressure on reserve margins in SPP because those projects are already likely included in SPP's reserve margin study, so they are not additional to the system, while load from these customers would be additional.

[20] A rough estimate of surplus interconnection potential on the Evergy system is available at https://www.scarcitytosurplus.com/dashboard.

in resource costs, particularly for thermal assets due to potential tariffs on key inputs and due to demand, high capital costs should be tested for their impact on resource selection.

Third, large loads, especially data centers, have the potential to present significant challenges to grid reliability. As described in a new working paper by Elevate Energy Consulting[21] and published by GridLab, large loads can cause challenges with respect to:

1. Load ramping, variability, and uncertainty,
2. Load cycling and oscillation risks,
3. Load ride-through performance,
4. Power quality and harmonic emissions,
5. Sub-synchronous oscillation risks, and
6. Impacts on utility protection systems.

It's critical that these and other potential grid impacts be studied during the interconnection process. Whether Evergy does so or not has implications not just for grid reliability, but also for costs since mitigations identified after new customers come online could be considered system resources with costs socialized to all customers.

IV. CONCLUSION

Q. Please summarize your recommendations.

A. My recommendations are as follows:

1. Evergy should be directed to include consideration of additional demand-side management, surplus interconnected resources, and novel projects such as Grain Belt

[21] Elevate Energy Consulting (March 2025). Practical Guidance and Considerations for Large Load Interconnections. [Draft Working Paper]. Available at: https://gridlab.org/portfolio-item/practical-guidance-and-considerations-for-large-load-interconnections/.

Express in its next IRP. It should also be directed to consider the impact of higher capital costs on resource selection.

2. Evergy should be directed to demonstrate that its large load tariff filing aligns with likely capital, operation, and transmission costs caused by those customers.

3. Evergy should be required to give the Commission quarterly updates on its large load pipeline including the load expected, status of studies of and negotiations with customers, and likely ramp and online dates.

4. Evergy should be directed to demonstrate for the Commission that its large load interconnection process accounts for the grid reliability risks outlined in the GridLab working paper cited in my testimony.

Q. Does that conclude your testimony?

A. Yes.

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NATURAL RESOURCES DEFENSE COUNCIL

EXHIBIT NRD-1

ENERGY FUTURES GROUP

Anna Sommer

Principal

PROFESSIONAL SUMMARY

Anna Sommer is a Principal of Energy Futures Group in Hinesburg, Vermont. She has over 20 years of experience working on a wide variety of energy planning related issues. Her primary focus is on all aspects of integrated resource planning (IRP) including capacity expansion and production costing simulation, scenario and sensitivity construction, modeling of supply and demand side resources, and review and critique of forecast inputs such as fuel prices, wholesale market prices, load forecasts, etc. Additionally, she has experience with various aspects of DSM planning including construction of avoided costs and connecting IRPs to subsequent DSM plans. Anna has had formal training on the Aurora, EnCompass, and Strategist models and has reviewed modeling performed using numerous models including Aurora, EnCompass, Capacity Expansion Model, PLEXOS, PowerSimm, PROSYM, PROMOD, RESOLVE, SERVM, Strategist, and System Optimizer. She has provided expert testimony in front of utility commissions in Indiana, Kentucky, Michigan, Minnesota, Montana, New Mexico, North Carolina, Puerto Rico, South Carolina, South Dakota, and West Virginia.

EXPERIENCE

2019-present: Principal, Energy Futures Group, Hinesburg, VT
2010-2019: President, Sommer Energy, LLC, Canton, NY
2007-2008: Project Manager, Energy Solutions, Oakland, CA
2003-2007: Research Associate, Synapse Energy Economics, Cambridge, MA

EDUCATION

M.S. Energy and Resources, University of California Berkeley, 2010

Master's Project: *The Water and Energy Nexus: Estimating Consumptive Water Use from Carbon Capture at Pulverized Coal Plants with a Case Study of the Upper Colorado River Basin*

B.S., Economics and Environmental Studies, Tufts University, 2003

ADDITIONAL TRAINING

Graduate coursework in Data Analytics – Clarkson University, 2015-2016.
Graduate coursework in Civil Engineering and Applied Mechanics – McGill University, 2010.
Research Experience in Carbon Sequestration (RECS), U.S. Department of Energy, 2009.

SELECTED PROJECTS

- Sierra Club. Reviewed and provided comments on Louisville Gas & Electric and Kentucky Utilities' 2024 Integrated Resource Plan. (2025)
- MISO Environmental Sector. Supporting the Environmental Sector of MISO on questions of resource adequacy redesign and system attribute acquisition. (2021 to present)
- The South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. Evaluated Santee Cooper's 2023 and 2024 IRPs and IRPs Updates. (2023-2024) Evaluated Dominion Energy South Carolina's 2020, 2021 2022, and 2024 IRP Updates. (2020 – 2024)
- GridLab. Part of the project team that evaluated resource mixes to achieve 100% emissions-free electricity by 2035 for the Public Service Company of New Mexico's electric system. (2022 to 2023)
- Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association. Reviewed and provided comments on East Kentucky Power Cooperative's 2022 Integrated Resource Plan. (2022)
- Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Metropolitan Housing Coalition, and Mountain Association. Reviewed and provided comments on Louisville Gas & Electric and Kentucky Utilities' 2021 Integrated Resource Plan. (2022)
- Minnesota Center for Environmental Advocacy. Evaluation of Minnesota Power's 2021 Integrated Resource Plan. (2021 – 2022) Evaluation of Xcel Energy's 2020 Integrated Resource Plan and Strategist modeling in support of that evaluation. (2019 to 2021) Evaluation of Minnesota Power Company's proposal to build a new natural gas combined cycle power plant and Strategist modeling of alternatives to the plant. Comments regarding Great River Energy's integrated resource plan to meet future energy and capacity needs.

(2018) Comments regarding Otter Tail Power's integrated resource plan to meet future energy and capacity needs. Comments regarding Minnesota Power's integrated resource plan to meet future energy and capacity needs. (2016) Comments regarding Great River Energy's integrated resource plan to meet future energy and capacity needs. (2015) Comments regarding Otter Tail Power's integrated resource plan to meet future energy and capacity needs. (2014) Comments regarding Xcel Energy's Sherco 1 and 2 Life-Cycle Management Study. Comments regarding Minnesota Power's proposal to retrofit Boswell Unit 4. Comments regarding Minnesota Power's integrated resource plan to meet future energy and capacity needs. Comments regarding Xcel Energy's integrated resource plan to meet future energy and capacity needs. (2013) Evaluation of Otter Tail Power's plan to diversify its baseload resources. Comments regarding Minnesota Power's "Baseload Diversification Study" – a resource planning exercise examining the use of fuels other than coal to serve baseload needs. (2012) Comments regarding IPL's integrated resource plan to comply with pending EPA regulations and meet future capacity and energy needs. (2011) Evaluation of a proposal by seven utilities to build a new supercritical pulverized coal plant including alternatives to the plant and potential for greenhouse gas regulation. (2006)

- Earthjustice. Evaluation of PREPA's request for proposals for temporary emergency generation. (May 2020) Evaluation of the Puerto Rico Electric Power Authority's 2019 Integrated Resource Plan. (2019 to 2020)
- The Council for the New Energy Economics. Participated in Evergy's integrated resource plan stakeholder workshops (2020 to 2021).
- EfficiencyOne. Supported EfficiencyOne's participation in Nova Scotia Power's integrated resource planning process. (2019 to 2020)
- Southern Alliance for Clean Energy. Evaluation of Dominion Energy South Carolina's 2020 Integrated Resource Plan. (2020)
- Washington Electric Cooperative. Assisted in preparation of their 2020 Integrated Resource Plan. (2019 to 2020)
- Coalition for Clean Affordable Energy. Evaluated the Public Service Company of New Mexico's abandonment and replacement of the San Juan generating station and sponsored EnCompass modeling of an alternative replacement portfolio. (2019 to 2020)

- Citizens Action Coalition of Indiana. Evaluation of Duke Energy Indiana's 2024 IRP. (2025) Evaluation of proposal by Northern Indiana Public Service Company to construct new combustion turbines. (2023) Evaluation of Duke Energy Indiana's 2021 IRP. (2022) Evaluation of Northern Indiana Public Service Company's 2021 IRP. (2022) Evaluation of Southern Indiana Gas and Electric's proposal to offer DSM programs to its customers. (2020) Comments regarding Indianapolis Power & Light's integrated resource plan to meet future energy and capacity needs. (2020) Advising stakeholders on stakeholder workshops in preparation for Southern Indiana Gas and Electric's integrated resource plans to meet future energy and capacity needs. Evaluation of Indianapolis Power & Light's proposal to offer DSM programs to its customers. Evaluation of Duke Energy Indiana's proposal to offer DSM programs to its customers. Evaluation of Indiana Michigan Power's proposal to offer DSM programs to its customers. (2019 to present) Comments regarding Duke Energy Indiana's integrated resource plan to meet future energy and capacity needs. Comments regarding Indiana Michigan Power's integrated resource plan to meet future energy and capacity needs. (2019) Comments on Northern Indiana Public Service Company's integrated resource plans to meet future energy and capacity needs. (2019) Evaluation of Southern Indiana Gas and Electric's proposal to build a new natural gas combined cycle power plant. (2018) Evaluation of Duke Energy Indiana's proposal to offer DSM programs to its customers. Evaluation of Southern Indiana Gas and Electric's proposal to offer DSM programs to its customers. Comments regarding Southern Indiana Gas and Electric Company's integrated resource plans to meet future energy and capacity needs. Comments regarding Indianapolis Power & Light's integrated resource plan to meet future energy and capacity needs. Comments regarding Northern Indiana Public Service Company's integrated resource plan to meet future energy and capacity needs. (2017) Comments regarding Duke Energy Indiana and Indiana Michigan Power's integrated resource plans to meet future energy and capacity needs. (2016)

SELECTED PUBLICATIONS

The Husker Energy Plan: A New Energy Plan for Nebraska, prepared by Anna Sommer, Tyler Comings, and Elizabeth Stanton for the Nebraska Wildlife Federation. January 16, 2018.

Pennsylvania Long-Term Renewables Contracts Benefits and Costs, prepared by Elizabeth Stanton, Anna Sommer, Tyler Comings, and Rachel Wilson for the Mid-Atlantic Renewable Energy Coalition. October 27, 2017.

"Pursue Carbon Capture and Utilization of Storage," "Establish Energy Savings Targets for Utilities," and "Tax Carbon Dioxide Emissions," in Implementing EPA's Clean Power

Plan: A Menu of Options, prepared by Anna Sommer for the National Association of Clean Air Agencies and the Regulatory Assistance Project. June 7, 2015.

Overpaying and Underperforming: The Edwardsport IGCC Project, prepared by Anna Sommer for Citizens' Action Coalition, Save the Valley, Valley Watch, and Sierra Club. February 3, 2015.

Public Utility Regulation Without the Public: The Alabama Public Service Commission and Alabama Power, prepared by David Schlissel and Anna Sommer for Arise Citizens' Policy Project. March 1, 2013.

A Texas Electric Capacity Market: The Wrong Tool for a Real Problem, prepared by Anna Sommer and David Schlissel for Public Citizen of Texas. February 12, 2013.

Independent Administration of Energy Efficiency Programs: A Model for North Carolina, prepared by David Nichols, Anna Sommer, and William Steinhurst for Clean Water for North Carolina, April 13, 2007.

Integrated Portfolio Management in a Restructured Supply Market, prepared by Paul Chernick, Jonathan Wallach, William Steinhurst, Tim Woolf, Anna Sommer, and Kenji Takahashi. June 30, 2006.

Ensuring Delaware's Energy Future: A Response to Executive Order No. 82, prepared by the Delaware Cabinet Committee on Energy with technical assistance at Synapse Energy Economics from William Steinhurst, Bruce Biewald, David White, Kenji Takahashi, Alice Napoleon, Amy Roschelle, Anna Sommer, and Ezra Hausman for the Delaware Public Service Commission staff. March 8, 2006.

"Assessment of Carbon Sequestration Feasibility and Markets," by Anna Sommer and William Steinhurst, in Mohave Alternatives and Complements Study, a Sargent & Lundy and Synapse Energy Economics, Inc., report prepared for Southern California Edison. February 2006.

Potential Cost Impacts of a Renewable Portfolio Standard in New Brunswick, prepared by Tim Woolf, David White, Cliff Chen, and Anna Sommer for the New Brunswick Department of Energy. October 2005.

Considering Climate Change in Electric Resource Planning: Zero is the Wrong Carbon Value, prepared by Lucy Johnston, Amy Roschelle, Ezra Hausman, Anna Sommer, and Bruce Biewald as a Synapse Energy Economics, Inc. report. September 20, 2005.

Potential Cost Impacts of a Vermont Renewable Portfolio Standard, prepared by Tim Woolf, David E. White, Cliff Chen, and Anna Sommer as a Synapse Energy Economics, Inc. report for the Vermont Public Service Board. October 16, 2003.

PRESENTATIONS AND ARTICLES

"Practical Strategies for the Electricity Transition." A presentation at Energy Finance 2019. June 18, 2019.

"Carbon Capture and Storage." A presentation at Energy Finance 2018. March 13, 2018.

"Puerto Rico's Electric System, Before and After Hurricane Maria." A webinar with Cathy Kunkel on behalf of the Institute for Energy Economics and Financial Analysis. October 24, 2017.

"Rebutting Myths About Energy Efficiency." A presentation at the Beyond Coal to Clean Energy Conference sponsored by Sierra Club and Energy Foundation. October 8, 2015.

"The Energy and Water Nexus: Carbon Capture and Water." A presentation at the Water and Energy Sustainability Symposium. September 28, 2010.

"Carbon Sequestration." A presentation to Vermont Energy Investment Corporation. August 17, 2009.

"Carbon Dioxide Emissions Costs and Electricity Resource Planning." A presentation before the New Mexico Public Regulation Commission with David Schlissel. March 28, 2007.

"Electricity Supply Prices in Deregulated Markets – The Problem and Potential Responses." A presentation at the NASUCA Mid-Year Meeting with Rick Hornby and Ezra Hausman. June 13, 2006.

"IGCC: A Public Interest Perspective." A presentation at the Electric Utilities Environmental Conference 2006. January 24, 2006.

Woolf, Tim, Anna Sommer, John Nielsen, David Barry and Ronald Lehr. "Managing Electric Industry Risk with Clean and Efficient Resources," The Electricity Journal, Volume 18, Issue 2, March 2005.

Woolf, Tim, and Anna Sommer. "Local Policy Measures to Improve Air Quality: A Case Study of Queens County, New York," Local Environment, Volume 9, Number 1, February 2004.

SELECTED EXPERT TESTIMONY

Before the South Carolina Public Service Commission, Docket No. 2021-93-E. *Dominion Energy South Carolina, Inc.'s Request for "Like Facility" Determinations Pursuant to S.C. Code Ann. § 58-33-110(1) and Waiver of Certain Requirements of Commission Order No. 2007-626.* On behalf of the Southern Alliance for Clean Energy and South Carolina Coastal Conservation League.

Before the Indiana Utility Regulatory Commission, Cause No. 45947. *Verified petition of Northern Indiana Public Service Company LLC for (1) issuance of a certificate of public convenience and necessity ("CPCN") pursuant to Ind. Code ch. 8-1-8.5 to construct an approximately 400 megawatt natural gas combustion turbine ("CT") peaking plant ("CT Project"); (2) approval of the CT project as a clean energy project and authorization for financial incentives including timely cost recovery through construction work in progress ratemaking under Ind. Code ch. 8-1-8.8; (3) authority to recover costs incurred in connection with the CT project; (4) approval of the best estimate of costs of construction associated with the CT project; (5) authority to implement a generation cost tracker mechanism ("GCT Mechanism"); (6) approval of changes to NIPSCO's electric service tariff relating to the proposed GCT mechanism; (7) approval of specific ratemaking and accounting treatment for the CT project; and (8) ongoing review of the ct project, all pursuant to ind. Code ch. 8-1-8.5 and 8-1-8.8, and ind. Code §§ 8-1-2-0.6 and 8-1-2-23.* On behalf of Citizens Action Coalition of Indiana, Inc.

Before the Public Service Commission of West Virginia, Case No. 22-0793-E-ENEC. *Petition and General Investigation to Determine Reasonable Rates and Charges on and after January 1, 2023.* On behalf of West Virginia Citizen Action Group, Solar United Neighbors, and Energy Efficient West Virginia.

Before the South Carolina Public Service Commission, Docket No. 2023-154-E. *South Carolina Public Service Authority's (Santee Cooper) 2023 Integrated Resource Plan (IRP).* On behalf of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

Before the Kentucky Public Service Commission, Case Number 2022-00387. *Electronic Joint Application Of Kentucky Utilities Company And Louisville Gas And Electric Company For Certificates Of Public Convenience And Necessity And Site Compatibility Certificates And Approval Of A Demand Side Management Plan,* on behalf of Metropolitan Housing Coalition, Mountain Association, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Kentucky Resources Council.

Before the South Carolina Public Service Commission, Docket No. 2019-226-E. *South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Dominion Energy South Carolina, Incorporated.* On behalf of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

Before the Public Service Commission of the State of Montana, Docket No. 2019.12.101. *In The Matter Of NorthWestern Energy's Application for Approval of Capacity Resource Acquisition*, on behalf of the Montana Environmental Information Center.

Before the New Mexico Public Regulation Commission, Case No. 19-00195-UT, *In The Matter Of Public Service Company Of New Mexico's Consolidated Application for Approvals for the Abandonment, Financing Order, and Resource Replacement For San Juan Generating Station Pursuant To The Energy Transition Act*, On behalf of Coalition for Clean Affordable Electricity.

Public Service Regulatory Board of the Puerto Rico Energy Bureau, Case No. CEPR-AP-2018-0001, *In RE: Puerto Rico Electric Power Authority Integrated Resource Plan*, on behalf of Local Environmental Organizations.

Before the South Dakota Public Utilities Commission, Case No. EL05-022, *In the Matter of the Application by Otter Tail Power Company on behalf of the Big Stone II Co-owners for an Energy Conversion Facility Siting Permit for the Construction of the Big Stone II Project*, on behalf of Minnesotans for an Energy-Efficient Economy, Izaak Walton League of America – Midwest Office, Union of Concerned Scientists, and Minnesota Center for Environmental Advocacy

PROFESSIONAL AFFILIATIONS

Board Member, **Public Utility Law Project of New York,** 2018 – present

STATE OF New York)
) ss.
COUNTY OF St. Lawrence)

VERIFICATION

Anna Sommer, being duly sworn upon her oath deposes and states that she is the **PRINCIPAL AT ENERGY FUTURES GROUP**, that she has read and is familiar with the foregoing Testimony, and attests that the statements contained therein are true and correct to the best of her knowledge, information and belief.

Anna Sommer
PRINCIPAL AT ENERGY FUTURES GROUP ("EFG")

Subscribed and sworn before me this 13th day of March 2025

Notary Public

My Appointment Expires:

Tabitha J. McCuen
Notary Public, State of New York
No. 01MC6279472
Qualified in St. Lawrence County
My Commission Expires 04/08/25

CERTIFICATE OF SERVICE

25-EKCE-207-PRE

I, the undersigned, hereby certifies that on March 13, 2025, the above and foregoing Direct Testimony was served via electronic service to the following:

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