

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

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

EVERGY RESPONSE TO ALLEGED DEFICIENCY

COMES NOW, Evergy Kansas Central, Inc. (“Evergy Kansas Central”) and Evergy Metro, Inc. (“Evergy Kansas Metro”) (collectively referenced hereinafter as “Evergy”), hereby submit to the Kansas Corporation Commission (“Commission”) this Response to the outstanding alleged deficiency submitted by Council for New Energy Economics (“NEE”) regarding Evergy’s Triennial 2024 Integrated Resource Plan (“2024 IRP”).

1. The Integrated Resource Plan and Capital Plan Framework (the “Framework”) was set forth in the Commission’s Order on February 6, 2020, in Docket No. 19-KCPE-096-CPL.

2. The Framework includes the following requirement: “If any Party finds any deficiencies, it shall work with Evergy and the other Parties to reach, within forty-five (45) days of the date that the report or comments were submitted, a joint agreement on a plan to remedy the identified deficiencies. If full agreement cannot be reached, this situation should be reported to the Commission through a joint filing as soon as possible, but no later than forty-five (45) days after the date on which the report or comments were submitted. The joint filing should set out in a brief narrative description those areas on which agreement cannot be reached. If full agreement on remedying deficiencies is not reached, then within sixty (60) days from the date on which the Parties submitted a report or comments relating to Evergy's compliance filing, Evergy may file a response and the Parties may file comments in response to each other's comments. The

Commission will issue an order which indicates on what items, if any, a hearing will be held and which also establishes a procedural schedule if necessary.”

3. On December 2, 2024, Evergy, NEE, and Sierra Club made a Joint Filing summarizing the alleged deficiencies expressed by the parties regarding Evergy’s Triennial 2024 IRP, addressed proposed resolutions to several alleged deficiencies and, in all but one instance, agreed that alleged deficiencies remaining unresolved do not need to be brought to a hearing before the Commission.

4. NEE Deficiency 7 is the only alleged deficiency remaining unresolved and without confirmation that Commission intervention is not required. NEE Deficiency 7 states that Evergy should evaluate natural gas price scenarios that are better aligned with historical volatility and realized costs within the region.

5. 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”.¹

¹ Staff’s Report and Recommendation, October 14, 2024.

WHEREFORE, Evergy respectfully requests the Commission find that its Triennial 2024 IRP successfully meets the requirements of the IRP Framework.

Respectfully submitted,

/s/ Cathryn J. Dinges

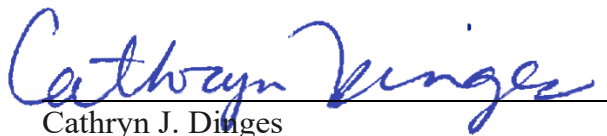
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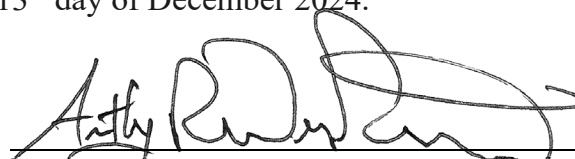
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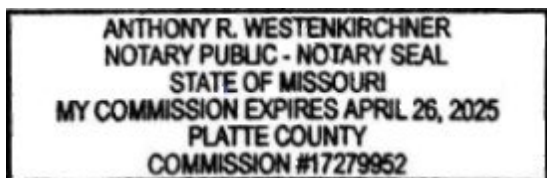
STATE OF MISSOURI)
) ss:
COUNTY OF JACKSON)

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 13th 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 13th day of December 2024 to:

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