

**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**

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) **Docket No. 25-EKCE-207-PRE**  
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Direct Testimony and Exhibits of

**Colin T. Fitzhenry**

On behalf of

**Kansas Industrial Consumers Group, Inc.**

March 14, 2025

**REDACTED VERSION**



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OF THE STATE OF KANSAS**

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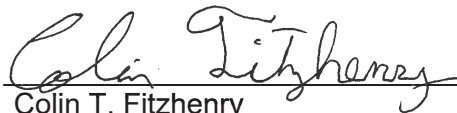
Docket No. 25-EKCE-207-PRE

STATE OF MISSOURI     )  
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COUNTY OF ST. LOUIS    )

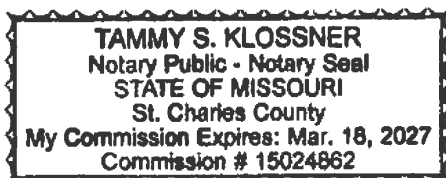
**Affidavit of Colin T. Fitzhenry**


Colin T. Fitzhenry, being first duly sworn, on his oath states:

1. My name is Colin T. Fitzhenry. I am an Associate with Brubaker & Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by Kansas Industrial Consumers Group, Inc. in this proceeding on their behalf.
2. Attached hereto and made a part hereof for all purposes are my direct testimony and exhibits which were prepared in written form for introduction into evidence in the Kansas State Corporation Commission Docket No. 25-EKCE-207-PRE.
3. I hereby swear and affirm that the testimony and the exhibits are true and correct and that they show the matters and things that they purport to show.

  
\_\_\_\_\_  
Colin T. Fitzhenry

Subscribed and sworn to before me this 14<sup>th</sup> day of March, 2025.



  
\_\_\_\_\_  
Notary Public

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**Confidential Direct Testimony of Colin T. Fitzhenry**

**I. INTRODUCTION**

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**Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A Colin T. Fitzhenry. My business address is 16690 Swingley Ridge Road, Suite 140, Chesterfield, MO 63017.

**Q WHAT IS YOUR OCCUPATION?**

A I am a consultant in the field of public utility regulation and an Associate with the firm of Brubaker & Associates, Inc., energy, economic and regulatory consultants.

**Q PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.**

A This information is included in Appendix A to my testimony.

1    **Q     HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE KANSAS CORPORATION**  
2    **COMMISSION (“COMMISSION”)?**

3    A     No. I have testified before regulatory commissions in Illinois, Maryland, Wyoming,  
4    Michigan, Oregon, Nevada, Utah, and the District of Columbia.

5    **Q     ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?**

6    A     I am appearing in this proceeding on behalf of Kansas Industrial Consumers Group,  
7    Inc. (“KIC”) and its participating members — [REDACTED]

8    [REDACTED]

9    [REDACTED] KIC is a group of large industrial  
10 customers which purchase substantial amounts of retail electric service from  
11 Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (collectively referred to as  
12 “Evergy Kansas Central” or “EKC”) and Evergy Metro, Inc. (“EKM”). The companies  
13 collectively will be referred to as “Evergy” or “Company.”

14   **Q     WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

15   A     My testimony will address the technical aspects of Evergy’s proposal for  
16 predetermination of ratemaking principles for the Viola Generating Station (“Viola”),  
17 McNew Generating Station (“McNew”), and Kansas Sky Solar Facility. KIC witness  
18 Michael Gorman will address the policy and ratemaking principles recommendations  
19 proposed by Evergy.

1 Q DOES THE FACT THAT YOU DID NOT ADDRESS EVERY ISSUE RAISED IN  
2 EVERGY'S TESTIMONY MEAN THAT YOU AGREE WITH EVERGY'S TESTIMONY  
3 ON THOSE ISSUES?

4 A No. It merely reflects that I did not choose to address all those issues. It should not  
5 be read as an endorsement of, or agreement with, Evergy's position on such issues.

6 Q ARE YOU SPONSORING ANY EXHIBITS IN CONNECTION WITH YOUR  
7 TESTIMONY?

8 A Yes, Exhibits CTF-1 through CTF-3.

## 9 II. BACKGROUND ON GENERATING FACILITIES

10 Q PLEASE DESCRIBE THE GENERATING FACILITIES UNDER CONSIDERATION IN  
11 THIS PROCEEDING?

12 A The Viola and McNew generating facilities are two advanced class 710 MW combined  
13 cycle gas turbine (CCGT) generating facilities. Each facility consists of a 1x1  
14 single-shaft advanced J-Class gas turbine, an electrical generator, a heat recovery  
15 steam generator, and a steam turbine with exhaust cooled by an air-cooled condenser.  
16 The Viola facility will be built in Sumner County, Kansas, and the McNew facility will be  
17 built in Reno County, Kansas. Commercial operation for the Viola project is expected  
18 in 2029, and commercial operation for the McNew project is expected in 2030.<sup>1</sup>

19 Kansas Sky Solar is a 200 MW DC (159 MW AC) single-axis tracking  
20 photovoltaic (PV) solar facility located in Douglas County, Kansas. The project is  
21 expected to reach commercial operation in December 2026. The project has a mature

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<sup>1</sup>Olson Direct at 4.

1 generation interconnection request queue position with the Southwest Power Pool  
2 (SPP). It will interconnect to the transmission grid at the 115kV Midland Junction  
3 substation owned by Evergy Kansas Central, Inc.<sup>2</sup>

4 **Q WHAT ARE THE MOST RECENT COST ESTIMATES FOR THESE GENERATING**  
5 **FACILITIES?**

6 A EKC's 50% share of Viola is expected to cost approximately [REDACTED], or [REDACTED]  
7 (Nameplate Capacity), and the 50% share of McNew is expected to cost [REDACTED],  
8 or [REDACTED] (Nameplate Capacity).<sup>3</sup> The total construction cost of the Kansas Sky  
9 Solar facility is estimated to be [REDACTED], or [REDACTED] (AC Capacity).<sup>4</sup> The  
10 combined cost of the generating facilities is expected to be over [REDACTED] with over  
11 [REDACTED] allocated to EKC customers.

12 **Q ARE THESE COST ESTIMATES REASONABLE COMPARED TO RECENT COST**  
13 **ESTIMATES FOR NEW GENERATING FACILITIES?**

14 A No. According to EIA's 2023 Annual Energy Outlook, the expected cost of a single  
15 shaft combined cycle generating plant is expected to be \$1106/kW (2022 \$/kW) in  
16 2029. Evergy's cost estimate for the McNew and Viola plants is more than [REDACTED] EIA's  
17 cost estimate. Similarly, EIA's cost estimate for Solar Photovoltaic with Axis Tracking  
18 is expected to be \$1,122 (2022 \$/kW) in 2026. Evergy's cost estimate for the  
19 Kansas Sky Solar plants is [REDACTED] greater than EIA's cost estimate.<sup>5</sup> I have summarized  
20 these cost differences in Confidential Table CTF-1 below.

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<sup>2</sup>Carlson Direct at 6.

<sup>3</sup>Olsen Supplemental Direct at 2.

<sup>4</sup>Carlson Direct at 11.

<sup>5</sup>U.S. Energy Information Administration, Annual Energy Outlook 2023, Table 55. Overnight Capital Costs for New Electricity Generating Plants Case: Reference case | Region: United States.



1 As can be seen from Confidential Table CTF-1, the combined cost of the generating  
2 facilities is [REDACTED] more than EIA estimates, or [REDACTED].

3 **Q ARE THESE COST ESTIMATES INCLUSIVE OF ALL EXPENSES NEEDED TO**  
4 **MAKE THE GENERATING FACILITIES OPERATIONAL?**

5 A No. The cost of the Viola and McNew generating facilities are exclusive of the cost of  
6 upgrades needed for natural gas delivery to the facilities.<sup>6</sup> According to Evergy's  
7 response to KCC Data Request 18, the natural gas interconnection cost for the McNew  
8 facility is estimated to be an additional [REDACTED].<sup>7</sup> This would be an [REDACTED]  
9 above current cost estimates. Furthermore, Evergy has yet to execute a contract for  
10 the construction of the natural gas infrastructure needed to serve the CCGT facilities.<sup>8</sup>

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<sup>6</sup>Confidential Exhibits JKO-8 and JKO-9.

<sup>7</sup>KGC Response to RFI for Evergy Electric Generation Power Plant, Hutchinson, Kansas provided in response to KCC Data Request 18.

<sup>8</sup>Olson Direct at 31.



1 While the Company is not requesting special ratemaking treatment for natural gas  
2 interconnection costs in this proceeding, this expense would eventually be passed on  
3 to Kansas ratepayers.

4 **Q WHAT IS YOUR CONCLUSION REGARDING THE COST ESTIMATES OF THE**  
5 **GENERATING FACILITIES INCLUDED IN THE PREFERRED PORTFOLIO?**

6 A The cost estimates presented by Evergy are excessive relative to recent industry  
7 estimates. Recent inflationary pressures are not sufficient to justify the increase in  
8 Evergy's cost estimates relative to EIA estimates. Given the elevated cost estimates,  
9 increased market demand for similar generating resources is likely driving costs higher.  
10 As a result, it is not in the best interest of Kansas ratepayers to fund these facilities at  
11 this time.

12 **III. RESOURCE PORTFOLIO SELECTION**

13 **Q HOW DID EVERGY IDENTIFY THE GENERATING FACILITIES BEING**  
14 **REQUESTED IN THIS PROCEEDING?**

15 A The generating facilities identified in this proceeding are in part based on Evergy's  
16 preferred plan identified in Evergy's 2024 triennial Integrate Resource Plan (IRP) filing.<sup>9</sup>  
17 In the Company's 2024 IRP filing, the EKC Preferred Portfolio called for 150 MW of  
18 solar additions in 2027, 663 MW of thermal resource additions in 2029, and 325 MW  
19 of thermal resource additions in 2030, among other resource additions.<sup>10</sup>

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<sup>9</sup>See Vol. 6, May 17, 2024, triennial filing, Evergy Kansas Central and Evergy Metro Preferred Portfolio Selection and Resource Acquisition Strategy - Integrated Resource Plan.

<sup>10</sup>Vandeveld Direct at 11.

1   **Q     WAS THE PREFERRED PLAN THE LOWEST COST RESOURCE PLAN**  
2   **IDENTIFIED IN THE IRP PROCESS?**

3   A     No. According to Company witness Cody Vandevelde, the preferred portfolio was the  
4     third lowest Net Present Value Revenue Requirement (NPVRR) alternative resource  
5     portfolio. Alternative plans, which included a delayed retirement of Jeffrey 2 and a plan  
6     that did not accelerate the addition of a one-half combined cycle unit by one year,  
7     produced lower cost results.<sup>11</sup>

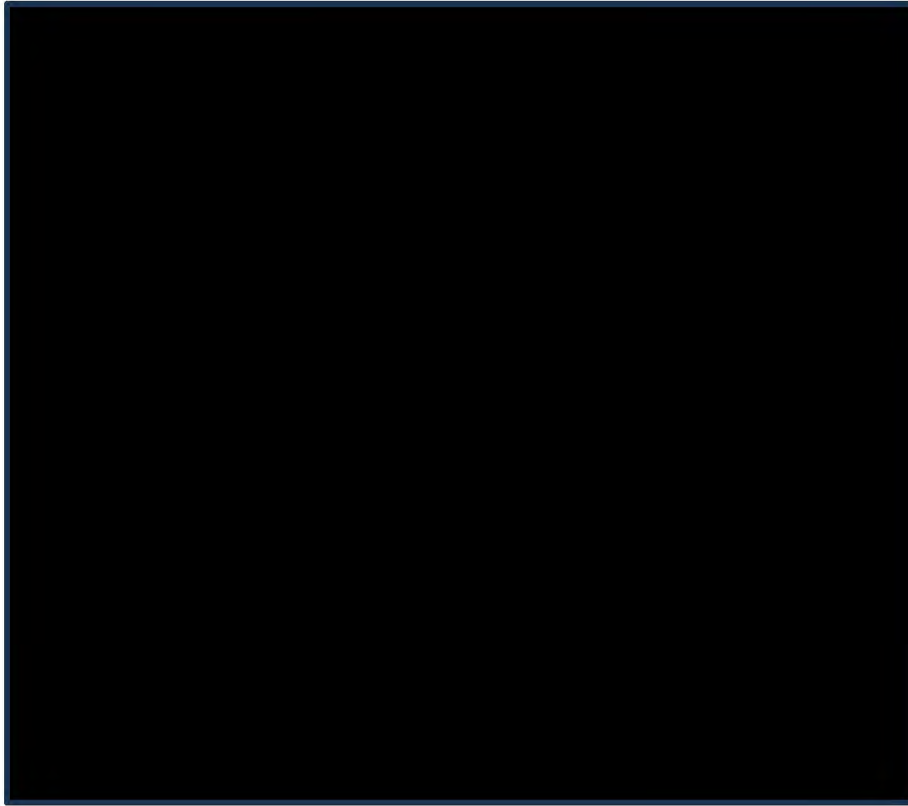
8   **Q     HAS EVERGY UPDATED ITS IRP MODELING TO REFLECT REVISED COST**  
9   **ESTIMATES OF THE CCGT GENERATING FACILITIES?**

10  A     Yes. In Response to Data Request KCC-1R, Evergy has updated its production cost  
11  modeling using the same resource plans, but updated the cost, size, and heat rates of  
12  the Combined Cycle and Combustion Turbine resources.<sup>12</sup> I have summarized the  
13  rankings of the resource plans using the revised cost estimates in Confidential  
14  Table CTF-2 below.

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<sup>11</sup>Vandevelde Direct at 14.

<sup>12</sup>Response to Data Request KCC-1R.



1 As can be seen from Confidential Table CTF-2, the Company's Preferred Plan is still  
2 not the least cost resource plan. [REDACTED]  
3 [REDACTED] These rankings are the  
4 weighted average of all modeling results including high and low gas sensitivities, high  
5 and low CO2 cost sensitivities, among others. It should be noted, that among the nine  
6 different modeling sensitives ran, the Preferred Plan was [REDACTED]  
7 in any of the sensitives. At best, it received a ranking of [REDACTED], and at worst [REDACTED].<sup>13</sup>

8 **Q WHAT IS YOUR CONCLUSION REGARDING THE COMPANY'S SELECTION OF**  
9 **THE PREFERRED PLAN?**

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<sup>13</sup>"Q\_KCC-1\_Updated Rankings Feb25 Costs.xlsx" provided in response to KCC-1R.

1 A It is perplexing to me that the Company would continue to pursue the Preferred Plan  
2 when production cost modeling has repeatedly demonstrated that the Preferred Plan  
3 is not the least cost option to Kansas ratepayers. The Company's IRP and recent  
4 modeling suggests that the delayed retirement of Jeffrey 2 is the least cost resource  
5 plan.

6 Furthermore, there is no existing precedent in Kansas, either through the  
7 Kansas Legislature or the Commission, that the early retirement of coal-fired power  
8 plants is in the best interest of Kansans. Instead, the preference for the preferred plan  
9 appears to be a pursuit of Evergy corporate goals,<sup>14</sup> without adequate consideration of  
10 the cost impacts to customers.

#### 11 **IV. FIRM WINTER CAPACITY**

12 **Q DO YOU HAVE ANY OTHER CONCERNS ABOUT EKC'S PREFERRED PLAN**  
13 **SELECTION?**

14 A Yes, the selection of both solar and natural gas resources could potentially lead to  
15 reliability issues during peak demand periods particularly during extreme winter storms.  
16 Solar resources provide limited accredited capacity contribution during winter months,  
17 and natural gas resources must have a firm fuel supply to operate whenever they are  
18 needed to serve demands.

19 As was discussed in detail in Staff's Report and Recommendation filed in  
20 Docket No. 21-GIMX-303-MIS, Winter Storm Uri placed "extreme pressure on Evergy's  
21 ability to procure natural gas for electricity in a reliably and economic fashion."<sup>15</sup> Evergy

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<sup>14</sup><https://investors.evergy.com/sustainability#:~:text=Net%20Zero%20Carbon%20Goal&text=It%20delivers%20cleaner%20energy%20through,and%20programs%2C%20please%20click%20here.>

<sup>15</sup>Docket No. 21-GIMX-303-MIS, Staff's Report and Recommendation, Page 6, January 19, 2022.

1 is now proposing to add natural gas resources that will only drive the demand for natural  
2 gas higher during extreme winter events. If Evergy is not able to procure firm pipeline  
3 transmission capacity to supply the CCGT facilities with natural gas whenever the units  
4 are called upon to operate, it would create significant concerns with the viability of the  
5 preferred resource plan.

6 **Q HAS EVERGY PROVIDED EVIDENCE THAT IT WILL HAVE FIRM UPSTREAM GAS**  
7 **PIPELINE DELIVERY CAPACITY TO OPERATE THE PLANNED NEW CCGTS AS**  
8 **FIRM CAPACITY RESOURCES?**

9 **A.** No. To the contrary, [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED].<sup>16</sup> This would suggest  
15 the accredited capacity for these new CCGTs could be well below their nameplate  
16 capacity rating. It's not clear if Evergy's preferred resource portfolio will allow the  
17 Company to comply with its SPP resource adequacy obligation.

18 **III. LOAD FORECAST**

19 **Q PLEASE DESCRIBE EKC'S HISTORICAL PEAK DEMAND.**

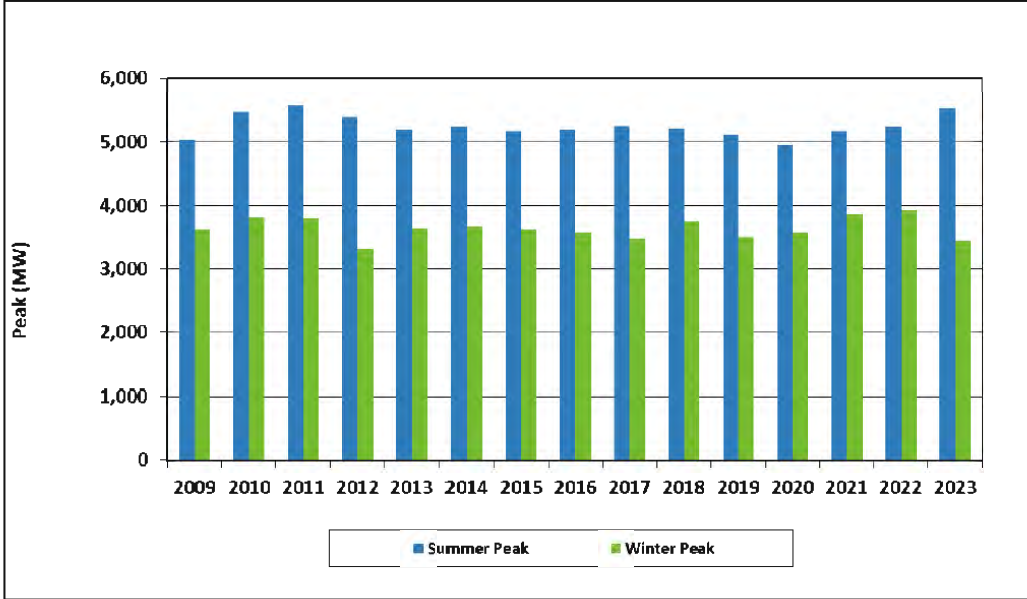
20 **A** I have shown EKC's summer and winter peak demands in Figure CTF-1 below.<sup>17</sup>

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<sup>16</sup> Response to Data Request KCC-45

<sup>17</sup>Evergy Kansas Central and Evergy Metro Volume 2 Load Analysis and Load Forecasting Integrated Resource Plan, Page 2, May 2024.

**Figure CTF-1  
EKC Historical Peak Demand**



1 As can be seen in Figure CTF-1, EKC’s historical summer and winter peak demand  
2 have been relatively flat, with no noticeable positive or negative trend over the past  
3 fifteen years. As discussed in the IRP, while EKC did see customer growth during this  
4 period it was largely offset by the adoption of more efficient end-use consumer products  
5 and appliances. The adoption of these more efficient products have resulted in  
6 declining average use for Evergy customers.<sup>18</sup>

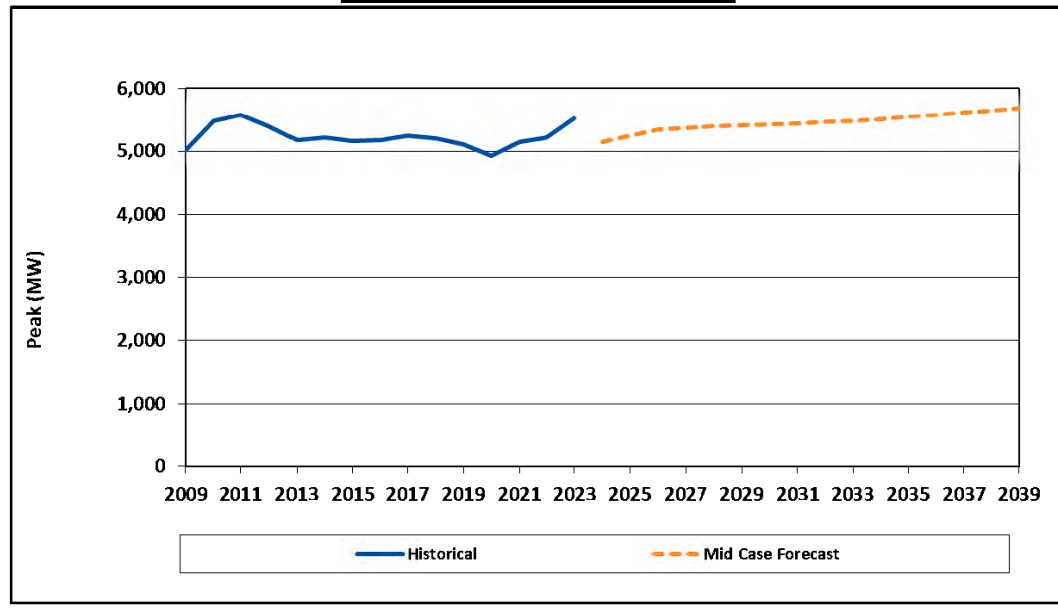
7 **Q IS EKC FORECASTING SIGNIFICANT DEMAND GROWTH?**

8 **A** No. I have shown EKC’s peak demand forecast in Figure CTF-2 below.<sup>19</sup>

<sup>18</sup>Evergy Kansas Central and Evergy Metro Volume 2 Load Analysis and Load Forecasting Integrated Resource Plan, Page 11, May 2024.

<sup>19</sup>Evergy Kansas Central and Evergy Metro Volume 2 Load Analysis and Load Forecasting Integrated Resource Plan, Page 9, May 2024.

**Figure CTF-2  
EKC Peak Demand Forecast**



1 As can be seen in Figure CTF-2, demand forecast is only expected to increase by few  
2 hundred Megawatts (MW) relative to the actual 2023 peak demand. Clearly, the  
3 1,579 MW of capacity being discussed in this proceeding is not solely being driven by  
4 retail demand growth.

5 **Q PLEASE DESCRIBE THE PURPOSE OF THE 50% SHARE OF VIOLA AND MCNEW**  
6 **THAT ARE NOT BEING PROCURED FOR EKC RETAIL CUSTOMERS?**

7 A The 50% share of the Viola Plant (305 MW) not being allocated to EKC will be entered  
8 into a Joint Ownership Agreement (JOA) with cost allocated to affiliate owners based  
9 on their ownership percentages.<sup>20</sup> The 50% share of the McNew plant (305 MW) not  
10 being allocated to EKC will be allocated to Evergy Missouri West (EMW). Evergy has  
11 indicated that the 50% of the McNew CCGT facility is being allocated to EMW as a

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<sup>20</sup>Klote Direct at 11.

1 result of an incremental large load customer.<sup>21</sup> EKC will act as the operator of both  
2 generating facilities due to their location in their service territory.

3 **Q DO YOU HAVE ANY CONCERNS ABOUT THE ADDITIONAL CAPACITY BEING**  
4 **PROCURED BY EVERGY THAT IS TIED TO THE CCGT FACILITIES?**

5 A Yes, because 50% of each CCGT is tied to new load from large customers, if these  
6 customers do not materialize, I'm concerned about how Evergy will deal with the excess  
7 CCGT capacity. KIC has asked EKC through discovery the status of negotiations with  
8 these large new load customers, but EKC has objected to providing any details.<sup>22</sup>  
9 Without any additional information, it is impossible to ascertain the likelihood that new  
10 load growth will materialize. It would be less risky for EKC customers, if the Company  
11 were only to procure the supply-side resources needed to meet its Planning Reserve  
12 Margin.

13 **Q IS EKC REQUIRED TO BUILD THESE FACILITIES TO SERVE NON-RETAIL**  
14 **LOAD?**

15 A No. While EKC can finance and construct the facilities for wholesale customers if they  
16 choose, the costs will not be included in rate base or allocated to EKC customers.

17 **Q WHAT IS YOUR CONCLUSION REGARDING THE NEED FOR THESE**  
18 **GENERATING RESOURCES IN ORDER TO SUPPORT RETAIL EKC DEMAND**  
19 **GROWTH?**

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<sup>21</sup>Ives Supplemental Direct at 3.

<sup>22</sup>Response to Data Request KIC 7-1.



1 A Recent load forecasts do not suggest that EKC will experience a significant capacity  
2 shortfall in the near-term period. In addition, a large portion of the new capacity is being  
3 constructed for non-retail customers. As discussed previously, alternative plans exist  
4 that would reduce risk and cost impacts for EKC ratepayers.

5 **Q DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

6 A Yes, it does.

1 **Qualifications of Colin Fitzhenry**

2 **Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A Colin Fitzhenry. My business address is 16690 Swingley Ridge Road, Suite 140,  
4 Chesterfield, MO 63017.

5 **Q PLEASE STATE YOUR OCCUPATION.**

6 A I am a consultant in the field of public utility regulation and an Associate with the firm  
7 of Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory consultants.

8 **Q PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.**

9 A I received a Bachelor of Science in General Engineering from the University of Illinois  
10 Urbana-Champaign, which provided a broad background in mechanics and control  
11 systems. Prior to joining BAI, I served as an Engineer Intern for Dynegey Inc., where I  
12 was involved with generation operation at both Vermilion Power Station and  
13 Tilton Power Station.

14 Since joining BAI in January 2013, I have provided assistance in several  
15 regulated utility matters. Some of these include resource planning, transmission  
16 planning, fuel cost recovery, environmental compliance plans, mergers, asset transfers,  
17 electrical and commodity price forecasting, and power procurement.

18 The firm of Drazen-Brubaker & Associates, Inc. was incorporated in 1972 and  
19 assumed the utility rate and economic consulting activities of Drazen Associates, Inc.,  
20 founded in 1937. In April 1995 the firm of Brubaker & Associates, Inc. was formed. It  
21 includes most of the former DBA principals and staff. Our staff includes consultants  
22 with backgrounds in accounting, engineering, economics, finance, mathematics,  
23 computer science and business.

1           Brubaker & Associates, Inc. and its predecessor firm have participated in over  
2           700 major utility rate and other cases and statewide generic investigations before utility  
3           regulatory commissions in 40 states, involving electric, gas, water, and steam rates and  
4           other issues. Cases in which the firm has been involved have included more than 80  
5           of the 100 largest electric utilities and over 30 gas distribution companies and pipelines.

6           While the firm has always assisted its clients in negotiating contracts for utility  
7           services in the regulated environment, increasingly there are opportunities for certain  
8           customers to acquire power on a competitive basis from a supplier other than its  
9           traditional electric utility. The firm assists clients in identifying and evaluating purchased  
10          power options, conducts RFPs and negotiates with suppliers for the acquisition and  
11          delivery of supplies. We have prepared option studies and/or conducted RFPs for  
12          competitive acquisition of power supply for industrial and other end-use customers  
13          throughout the United States and in Canada, involving total needs in excess of 3,000  
14          megawatts. The firm is also an associate member of the Electric Reliability Council of  
15          Texas.

16          In addition to our main office in St. Louis, the firm also has branch offices in  
17          Corpus Christi, Texas; Louisville, Kentucky and Phoenix, Arizona.

522905



Evergy Kansas Central  
Case Name: 2025 EKC Predetermination  
Case Number: 25-EKCE-207-PRE

Requestor Zakoura James -  
Response Provided March 10, 2025

Question:KIC-7-1

Please refer to the Supplemental Direct Testimony of Company witness Darren Ives, page 3, where Mr. Ives states “[t]he addition of an incremental large load customer under evaluation is confirmed to be located in EMW territory.” Please provide the current status of Evergy’s discussions with the referenced customer and describe any agreements signed by the customer and/or engineering studies conducted on their behalf.

**RESPONSE:** (do not edit or delete this line or anything above this)

**Confidentiality:** PUBLIC

**Statement:** This response is Public. No Confidential Statement is needed.

**Response:**

**Objection:**

Evergy objects to DR 7-1 on the basis of relevance. The specific identity of any customer of EMW, a Missouri affiliate of EKC, and any specific discussions, agreements, or engineering studies with or related to any such customer or customers are not relevant to this docket. The requested information is also highly confidential and commercially sensitive information belonging to Evergy and the proposed customers. The relevant matters as they relate to the issues currently under review in Kansas do not include or encompass dealings with any specific customer or customers of EMW.

**Information provided by:** Cole Bailey, Corporate Counsel Dir

**Attachment(s):**



**Verification:**

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*  
Director Regulatory Affairs



Evergy Kansas Central  
Case Name: 2025 EKC Predetermination  
Case Number: 25-EKCE-207-PRE

Requestor Grady Justin -  
Response Provided February 17, 2025

Question:KCC-1R

Regarding: Update to Plan Performance Ranking Spreadsheet

Please Provide the Following: update to this requested information when Evergy provides its supplemental filing on February 14, 2025

In the Confidential workpapers provided by Evergy, there is an excel spreadsheet named “Conf. Kansas Central Rankings and Performance Metrics 10\_31”. This spreadsheet appears to be an updated version of the file “Appendix 5A Evergy Kansas Central Rankings and Performance Metrics”, provided during the 2024 IRP filing, from Docket No. 24-EKCE-387-CPL, however the spreadsheet has been updated to account for a new modeled plan, reflecting the updated costs and characteristics of Kansas Sky solar. What has not been updated in this spreadsheet is the updated cost characteristics and cost estimates for Combustion Turbines or the updated characteristics and cost estimates to construct a Combined Cycle Generating Unit. Please provide the following with regard to this file:

Can Evergy update in this proceeding the aforementioned spreadsheet from the 2024 IRP filing (or the one filed in this Docket with just the Kansas Sky updates) to account for the higher costs and updated characteristics of both Combustion Turbines and Combined Cycle generators? If so, please provide that update.

If this information cannot be provided, please explain why it cannot be provided.

If Evergy cannot update and provide the information as requested in No. 1 above, can Evergy provide an update to the Spreadsheet that doesn't rerun the Capacity Expansion model for each plan, but which updates the cost estimates and NPVRR calculations for each resource plan that selects and builds a Combined Cycle generation unit, to account for Evergy's most recent cost estimates of the Combined Cycle Generating Units in this Docket?

If Evergy cannot provide the documents described in No. 3 above, please explain why not.

For the data requested in No. 1 and No. 3 above, if this information is provided by Evergy, please provide an update to this requested information when Evergy provides its supplemental



filing on  
February 14, 2025.

**RESPONSE:** (do not edit or delete this line or anything above this)

**Confidentiality:** PUBLIC

**Statement:** This response is Public. No Confidential Statement is needed.

**Response:**

Please see the two files attached with updated revenue requirements and rankings calculations for the ranked plans filed in the 2024 IRP. All resource plans are the same, the only change is the cost, size, and heat rates of the Combined Cycle and Combustion Turbine resources. The first file uses the updated Combined Cycle and Combustion Turbine costs from the fall filing. The second file uses the most recently updated Combined Cycle and Combustion Turbine costs included in the 2/14 supplemental filing.

**Information provided by:**

Maxwell Griffith, Energy Resource Analyst

**Attachment(s):**

Q\_KCC-1\_Updated Rankings Nov24 Costs

Q\_KCC-1\_Updated Rankings Feb25 Costs

**Verification:**

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*

Director Regulatory Affairs

**Kansas Central Plan Ranked Summary - 20 Year View**

**Kansas Central Overall Plan Rankings**

Rank	Plan	NPV/R	Difference	Description
1	ABAA	35,004		Retire Jeffrey 2 2039
2	AAAA	35,449	446	PP 2023, Extend DSM
3	AAAJ	35,490	486	No 2027 Solar
4	AAAB	35,495	491	1/2 CC
5	ADAA	35,674	671	Retire La Cygne 2 2032
6	AAAD	35,904	900	Low/Low
7	AAAC	36,151	1,148	High/High
8	BAAA	36,154	1,151	KEEIA Only
9	ACAA	36,222	1,219	Retire Jeffrey all 2030
10	AEEA	36,630	1,627	Retire all earliest
11	AFAD	36,701	1,698	Low/Low, No retirements
12	AAAG	39,320	4,317	Only renewable/storage built, budget relaxed
13	AEAG	39,349	4,345	Retire all early, only renewable/storage, budget relaxed

**Kansas Central High CO2 Plan Rankings**

Rank	Plan	NPV/R	Difference	Description
1	ABAA	36,155		Retire Jeffrey 2 2039
2	AAAA	36,286	131	PP 2023, Extend DSM
3	AAAB	36,338	173	1/2 CC
4	AAAJ	36,343	188	No 2027 Solar
5	ADAA	36,492	337	Retire La Cygne 2 2032
6	AAAC	36,494	340	High/High
7	BAAA	36,597	442	KEEIA Only
8	ACAA	37,601	907	Retire Jeffrey all 2030
9	AAAD	37,235	1,080	Low/Low
10	AEEA	37,587	1,402	Retire all earliest
11	AAAG	39,802	3,647	Only renewable/storage built, budget relaxed
12	AEAG	39,816	3,661	Retire all early, only renewable/storage, budget relaxed
13	AFAD	41,624	5,469	Low/Low, No retirements

**Kansas Central Mid CO2 Plan Rankings**

Rank	Plan	NPV/R	Difference	Description
1	ABAA	34,659		Retire Jeffrey 2 2039
2	AAAA	35,362	493	PP 2023, Extend DSM
3	AAAJ	35,369	500	No 2027 Solar
4	AAAB	35,398	529	1/2 CC
5	ADAA	35,563	704	Retire La Cygne 2 2032
6	AAAD	35,914	1,055	Low/Low
7	BAAA	36,088	1,229	KEEIA Only
8	AAAC	36,100	1,241	High/High
9	ACAA	36,104	1,246	Retire Jeffrey all 2030
10	AEEA	36,504	1,646	Retire all earliest
11	AFAD	37,000	2,162	Low/Low, No retirements
12	AAAG	39,237	4,379	Only renewable/storage built, budget relaxed
13	AEAG	39,269	4,411	Retire all early, only renewable/storage, budget relaxed

**Kansas Central Low CO2 Plan Rankings**

Rank	Plan	NPV/R	Difference	Description
1	AFAD	32,662		Low/Low, No retirements
2	ABAA	34,662	1,799	Retire Jeffrey 2 2039
3	AAAD	35,078	2,216	Low/Low
4	AAAA	35,182	2,320	PP 2023, Extend DSM
5	AAAJ	35,222	2,359	No 2027 Solar
6	AAAB	35,228	2,366	1/2 CC
7	ADAA	35,481	2,599	Retire La Cygne 2 2032
8	BAAA	35,809	2,947	KEEIA Only
9	ACAA	35,999	3,137	Retire Jeffrey all 2030
10	AAAC	36,070	3,208	High/High
11	AEEA	36,379	3,516	Retire all earliest
12	AAAG	39,242	6,369	Only renewable/storage built, budget relaxed
13	AEAG	39,261	6,388	Retire all early, only renewable/storage, budget relaxed

**Kansas Central High NG Plan Rankings**

Rank	Plan	NPV/R	Difference	Description
1	ABAA	35,873		Retire Jeffrey 2 2039
2	AAAA	36,479	606	PP 2023, Extend DSM
3	AAAB	36,527	654	1/2 CC
4	AAAJ	36,541	668	No 2027 Solar
5	ADAA	36,776	903	Retire La Cygne 2 2032
6	AAAC	37,004	1,131	High/High
7	AAAD	37,069	1,196	Low/Low
8	BAAA	37,262	1,389	KEEIA Only
9	ACAA	37,473	1,600	Retire Jeffrey all 2030
10	AFAD	37,704	1,831	Low/Low, No retirements
11	AEEA	38,059	2,186	Retire all earliest
12	AAAG	39,295	3,422	Only renewable/storage built, budget relaxed
13	AEAG	39,422	3,549	Retire all early, only renewable/storage, budget relaxed

**Kansas Central Mid NG Plan Rankings**

Rank	Plan	NPV/R	Difference	Description
1	ABAA	35,003		Retire Jeffrey 2 2039
2	AAAA	35,434	431	PP 2023, Extend DSM
3	AAAJ	35,473	470	No 2027 Solar
4	AAAB	35,479	476	1/2 CC
5	ADAA	35,659	656	Retire La Cygne 2 2032
6	AAAD	35,975	972	Low/Low
7	BAAA	36,127	1,125	KEEIA Only
8	AAAC	36,150	1,147	High/High
9	ACAA	36,195	1,192	Retire Jeffrey all 2030
10	AEEA	36,596	1,593	Retire all earliest
11	AFAD	36,846	1,843	Low/Low, No retirements
12	AAAG	39,313	4,310	Only renewable/storage built, budget relaxed
13	AEAG	39,337	4,335	Retire all early, only renewable/storage, budget relaxed

**Kansas Central Low NG Plan Rankings**

Rank	Plan	NPV/R	Difference	Description
1	ABAA	34,633		Retire Jeffrey 2 2039
2	AAAA	35,031	398	PP 2023, Extend DSM
3	AAAJ	35,064	431	No 2027 Solar
4	AAAB	35,075	442	1/2 CC
5	ADAA	35,225	592	Retire La Cygne 2 2032
6	AAAD	35,446	813	Low/Low
7	ACAA	35,721	1,088	Retire Jeffrey all 2030
8	BAAA	35,722	1,090	KEEIA Only
9	AAAC	35,789	1,156	High/High
10	AEEA	36,057	1,425	Retire all earliest
11	AFAD	36,352	1,719	Low/Low, No retirements
12	AAAG	39,335	4,702	Retire all early, only renewable/storage, budget relaxed
13	AEAG	39,342	4,709	Only renewable/storage built, budget relaxed

**Kansas Central High Construction Cost Plan Rankings**

Rank	Plan	NPV/R	Difference	Description
1	ABAA	36,079		Retire Jeffrey 2 2039
2	AAAA	36,600	521	PP 2023, Extend DSM
3	AAAJ	36,625	547	No 2027 Solar
4	AAAB	36,655	576	1/2 CC
5	ADAA	36,882	804	Retire La Cygne 2 2032
6	AAAD	36,885	807	Low/Low
7	AFAD	37,025	946	Low/Low, No retirements
8	BAAA	37,448	1,370	KEEIA Only
9	ACAA	37,538	1,459	Retire Jeffrey all 2030
10	AAAC	37,687	1,609	High/High
11	AEEA	37,855	1,777	Retire all earliest
12	AAAG	42,320	6,241	Only renewable/storage built, budget relaxed
13	AEAG	42,427	6,349	Retire all early, only renewable/storage, budget relaxed

**Kansas Central Mid Construction Cost Plan Rankings**

Rank	Plan	NPV/R	Difference	Description
1	ABAA	35,050		Retire Jeffrey 2 2039
2	AAAA	35,529	479	PP 2023, Extend DSM
3	AAAJ	35,566	516	No 2027 Solar
4	AAAB	35,572	522	1/2 CC
5	ADAA	35,754	704	Retire La Cygne 2 2032
6	AAAD	35,956	906	Low/Low
7	AAAC	36,143	1,093	High/High
8	BAAA	36,233	1,183	KEEIA Only
9	ACAA	36,288	1,239	Retire Jeffrey all 2030
10	AFAD	36,807	1,647	Low/Low, No retirements
11	AEEA	36,734	1,584	Retire all earliest
12	AAAG	38,962	3,913	Only renewable/storage built, budget relaxed
13	AEAG	38,975	3,925	Retire all early, only renewable/storage, budget relaxed

**Kansas Central Low Construction Cost Plan Rankings**

Rank	Plan	NPV/R	Difference	Description
1	ABAA	33,837		Retire Jeffrey 2 2039
2	AAAA	34,143	306	PP 2023, Extend DSM
3	AAAB	34,180	344	1/2 CC
4	AAAJ	34,203	366	No 2027 Solar
5	ADAA	34,307	470	Retire La Cygne 2 2032
6	AAAC	34,633	796	High/High
7	BAAA	34,704	866	KEEIA Only
8	ACAA	34,772	935	Retire Jeffrey all 2030
9	AAAD	34,807	970	Low/Low
10	AEEA	35,099	1,262	Retire all earliest
11	AFAD	36,397	2,559	Low/Low, No retirements
12	AAAG	37,919	4,112	Retire all early, only renewable/storage, budget relaxed
13	AEAG	37,937	4,200	Only renewable/storage built, budget relaxed

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All Ranks										Plan	Description	
Overall	High NG	Mid NG	Low NG	High CO2	Mid CO2	Low CO2	High Load	Mid Load	Low Load			Old Name
2	2	2	2	2	2	2	4	2	2	2	AAAA	PP 2023; Extend DSM
8	8	7	8	7	7	8	8	8	7	7	BAAA	KEEIA Only
4	3	4	4	3	4	6	4	4	3	4	AAAB	1/2 CC
7	6	8	9	6	8	10	10	7	6	8	AAAC	High/High
1	1	1	1	1	1	2	1	1	1	1	ABAA	Retire Jeffrey 2 2039
9	9	9	7	8	9	9	9	9	8	9	ACAA	Retire Jeffrey all 2030
5	5	5	5	5	5	7	5	5	5	5	ADAA	Retire La Cygne 2 2032
6	7	6	6	9	6	3	6	6	9	6	AAAD	Low/Low
10	11	10	10	10	10	11	11	11	10	11	AEAA	Retire all earliest
11	10	11	11	13	11	1	7	10	11	11	AFAD	Low/Low, No retirements
12	12	12	13	11	12	12	12	12	13	13	AAAG	Only renewable/storage build, budget relaxed
13	13	13	12	12	13	13	13	13	12	13	AEAG	Retire all early, only renewable/storage, budget relaxed
3	4	3	3	4	3	5	3	3	4	4	AAAA	No 2027 Solar

NG NPVRs			CO2 NPVRs			ConCosts NPVRs				
Wtd	Avg	High	Mid	Low	High	Mid	Low	High	Mid	Low
35,449	36,479	35,434	35,031	36,286	35,352	35,182	36,600	35,528	34,143	34,143
36,154	37,252	36,127	35,722	36,997	36,088	35,809	37,448	36,233	34,704	34,704
35,495	36,527	35,479	35,075	36,328	35,398	35,228	36,655	35,572	34,180	34,180
36,151	37,004	36,150	35,789	36,494	36,100	36,070	37,687	36,143	34,633	34,633
35,004	35,873	35,003	34,633	36,155	34,859	34,662	36,079	35,050	33,837	33,837
36,222	37,479	36,195	35,721	37,061	36,104	35,999	37,538	36,288	34,772	34,772
35,674	36,776	35,659	35,225	36,492	35,563	35,451	36,882	35,754	34,307	34,307
35,904	37,069	35,875	35,446	37,235	35,914	35,078	36,895	35,956	34,807	34,807
36,630	38,059	36,596	36,067	37,557	36,504	36,379	37,955	36,734	35,099	35,099
36,701	37,704	36,646	36,352	41,824	37,020	32,862	37,025	36,697	36,387	36,387
39,320	39,295	39,313	39,342	39,802	39,237	39,232	42,320	38,962	37,037	37,037
39,349	39,422	39,337	39,335	39,816	39,269	39,261	42,427	38,975	37,019	37,019
35,490	36,541	35,473	35,064	36,343	35,389	35,222	36,625	35,566	34,203	34,203

**Confidential – Exhibit CTF-2**

**All pages have been redacted.**

**Highly Confidential – Natural Gas Exhibit CTF-3**

**All pages 1 through 28 have been redacted.**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of March 2025, the above and foregoing was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to all parties on the service list as follows:

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