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

CROSS-ANSWERING TESTIMONY OF WILLIAM "NICK" JONES ON BEHALF OF THE COUNCIL FOR THE NEW ENERGY ECONOMICS

PUBLIC VERSION

March 21, 2025

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I. INTRODUCTION

Q: Please state your name, title, and business address.

A: Nick Jones, Utility Economics Senior Analyst at the Council for the New Energy Economics ("NEE"). My business address is 1121 Military Cutoff Road, Suite C #205, Wilmington, NC 28405.

Q: Are you the same Nick Jones that previously provided direct testimony on behalf of NEE in this proceeding?

A: Yes.

Q: What is the purpose of your testimony?

A: The purpose of my Cross-Answering Testimony is to respond to the arguments set forth in the Direct Testimony of Kansas Corporation Commission ("KCC") Staff witness Justin Grady. As discussed in my Direct Testimony, NEE previously provided comments in Evergy's 2024 Triennial IRP proceeding which alleged that Evergy's natural gas forecasting methodology was inadequate and could bias forecasts to underestimate future fuel costs and discount risk.[1] Mr. Grady's testimony specifically addresses the deficiency NEE raised and sets forth his disagreement with NEE's position.[2] I also provide commentary on several broader arguments which Mr. Grady has made about natural gas markets.

[1] Kansas Corporation Commission ("KCC") Docket No. 24-EKCE-387-CPL, *Comments of the Council for the New Energy Economics*, pp. 18-23 (Oct. 14, 2024).
[2] KCC Docket No. 25-EKCE-207-PRE, *Direct Testimony of Justin Grady*, pp. 66-68 (Mar. 14, 2025).

Q: Please provide a summary of your recommendations to the Kansas Corporation Commission in this proceeding.

A: The Commission should reject KCC witness Grady's arguments concerning NEE's alleged deficiency because they do not answer NEE's concerns. This testimony will explain, point-by-point, how Mr. Grady's dismissal of NEE's alleged deficiency is premature, and a closer analysis confirms that Evergy's forecasting methodology is inadequate.

Further, I recommend that the Commission reject Mr. Grady's general characterization of the outlook for the natural gas market which I believe obscures the market risk involved with supplying the proposed plants as well as opportunities to improve risk management. Instead, the Commission should consider the following recommendations highlighted in my direct testimony:

- The Commission should evaluate the proposed resources according to a higher natural gas forecast than Evergy has provided; and
- The Commission should consider Evergy's fuel supply plan inadequate for minimizing risk to ratepayers.

Lastly, I make a new recommendation that the Commission require Evergy incorporate multi-year hedges or supply contracts into its procurement plan.

II. EVERGY'S INCLUSION OF LOCAL BASIS PRICING

Q: Please describe the deficiency alleged regarding local basis pricing and how KCC witness Grady has responded to it?

A: NEE alleged that Evergy's natural gas forecast fails to account for local market dynamics by focusing on prices at Henry Hub.[3] In his Direct Testimony, Mr. Grady responded that

[3] KCC Docket No. 24-EKCE-387-CPL, NEE Comments at 18-23.

Evergy's price forecast accounts for the basis differential between Henry Hub and the Panhandle Eastern hub point which is nearer to Evergy's fleet.[4] Mr. Grady stated that Staff finds this to be an adequate means of forecasting local prices.

Q: Do you agree that adjusting for the Panhandle Eastern basis differential adequately captures local pricing dynamics?

A: No. This is equivalent to forecasting Henry Hub prices and then adding the average difference between Henry Hub and Panhandle Eastern prices. Therefore, the forecast fundamentally assumes that local pricing will move in parallel with Henry Hub. Local markets throughout the country routinely diverge from trends at Henry Hub due to constraints in infrastructure which create local supply and demand bubbles. Even where pricing hubs are relatively close to each other geographically, local prices can experience price spikes far above neighboring regions when pipeline capacity is bottlenecked in between the two areas. NEE's review of public data suggests that such "blow outs," where local prices have dramatically spiked beyond national prices, have occurred periodically during winter months in Kansas. Forecasting at a local level would mean accounting for events like this in which local prices disconnect from national markets and forecasting how these dynamics may change in the future. Evergy's forecasting methodology does not appear to do either.

[4] Grady Direct at 67.

III. ANALYSIS OF EVERGY'S HISTORICAL FUEL COSTS

Q: Please describe KCC witness Grady's criticism of NEE's analysis of historical fuel costs.

A: Mr. Grady dismisses NEE's comparisons between Evergy's historical fuel costs and Evergy's forecast on the grounds that they conflate commodity prices with delivered costs.[5] Delivered costs include not only the price paid for the commodity volume but also the fixed reservation fees and variable tariffs associated with pipeline transportation. Evergy has modeled transportation costs separately from commodity prices.[6] Mr. Grady's view appears to be that this definitional difference explains and resolves the disconnect that NEE has observed between Evergy's forecast and historical costs.

Q: Have you or NEE conflated commodity prices with delivered costs?

A: No. NEE's 2024 IRP comments and my testimony in this docket have both been careful to distinguish commodity prices from delivered costs. As I have attested in this docket, reservation fees and transportation costs are generally too low to explain the frequently large differences observed between historical delivered costs and Evergy's forecasts or between historical delivered costs and benchmark prices at Henry Hub.[7]

Q: Why have you used Evergy's delivered costs instead of realized commodity prices in your testimony?

A: I have used delivered costs because they are publicly available unlike realized commodity prices. I determined in my analysis that the difference between these values, while worthy of clarification, was not likely to be significant enough to shift my results. I suggest that

[5] *Id*.
[6] *Id*.
[7] KCC Docket No. 25-EKCE-207-PRE, *Direct Testimony of Nick Jones*, p. 16 (Mar. 14, 2025).

the same analysis could be improved with Evergy's internal data on realized commodity prices and other components of delivered cost, were the Company to provide such data to Staff or NEE for use in updating this analysis. Provision of this data in this docket would eliminate any doubts as to the validity of comparisons between the Company's past price forecasts, the Company's historical fuel costs, and historical commodity prices at benchmark hubs.

Q: Are your critiques of Evergy's forecasting methodology still relevant once the difference between delivered costs and realized commodity prices are considered?

A: Yes. I restate here that the difference between these values is the inclusion of transportation costs. While transportation costs are certainly one factor behind the discrepancies I have highlighted, I find that they likely can only explain a minority share. To explain the full gap between these values requires that either 1) the local commodity price which Evergy has paid has been higher than the price at Henry Hub or 2) the monthly costs have been inflated by the need to buy more gas during periods of high prices. This aligns with the two core critiques which I have made in my testimony in this docket against Evergy's forecasting methodology – that the forecast does not provide prices which are local and timely, correlating to where and when these plants will be consuming natural gas.

Q: How have you confirmed this conclusion is not skewed by the use of delivered costs in analysis as Grady implies?

A: Since reviewing Mr. Grady's testimony, I looked back at my Direct Testimony in this docket. I tested my analysis of the Company's natural gas procurement at the Hawthorn plant to see if my results would shift if delivered costs were adjusted to account for transportation costs. Due to the short window to file a cross answer, I was only able to test

this one portion of my analysis, but I believe the results are representative of what would be found if I performed similar tests on the remainder of my analysis presented in testimony or in NEE's 2024 IRP comments.

Q: What did your analysis find?

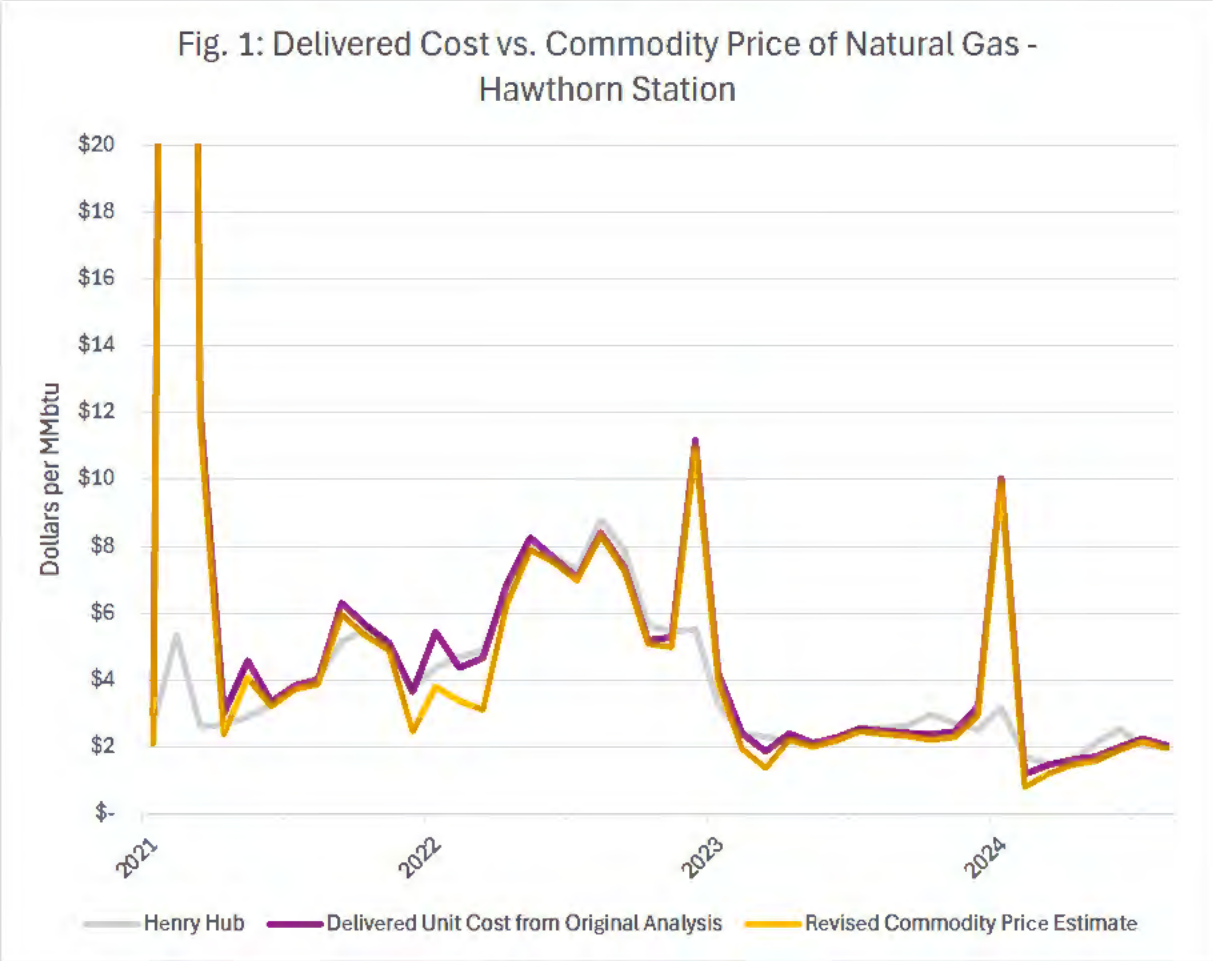
A: I can confirm that my conclusions on Hawthorn remain accurate even when adjustments are made for transportation costs. Making these adjustments has only a slight impact on my analysis of Evergy's commodity price forecasts or exposure to commodity risks. As shown in Figure 1, the revised unit-price is meaningfully lower at some points in recent history, but these are generally periods where gas consumption was low and therefore fixed prices like firm transport had a larger impact on average fuel costs. This is the case from December 2021 through May 2022 when deliveries to Hawthorn averaged just 65,000 MMbtu per month.[8] During periods where consumption was high, such as December 2022 or January 2024, the adjusted commodity price estimate is very near the delivered unit cost that I have used for analysis in my testimony and previously in NEE's IRP comments. Both are much higher than Henry Hub during these months, confirming NEE's argument that fuel supplies during peak demand periods are subject to local dynamics which depart from a normal basis spread.

I found that transportation costs likely made up about 3% of delivered costs during the period analyzed in my testimony, from June 2022 through July 2024. Estimated commodity prices still averaged 36% above Evergy's mid-case 2021 IRP forecast.[9] Therefore, the difference between commodity prices and delivered costs – and the fact that

[8] Energy Information Administration, Form EIA-923 Detailed Data Schedule 2. Accessible at: https://www.eia.gov/electricity/data/eia923/.
[9] KCC Docket No. 19-KCPE-096-CPL, Annual Update at 32, Table 23.

Evergy has modeled each separately in their cost studies – does not address the primary concern that Evergy's forecast is too broad and likely to underestimate future prices.

Figure 1: Delivered Cost vs. Commodity Price of Natural Gas - Hawthorn Station[10]



[10] Energy Information Administration, Form EIA-923 Detailed Data Schedule 2. Accessible at: https://www.eia.gov/electricity/data/eia923/.
[10] *Id.*; Energy Information Administration/Thomson Reuters, Henry Hub Natural Gas Spot Price. Accessible at: https://www.eia.gov/dnav/ng/hist/rngwhhdm.htm.

Q: Can you describe the methodology and assumptions you used to reach the above finding?

A: I created an estimate for monthly transportation costs at Hawthorn, including pipeline reservation fees and transport tariffs, so that I could "back out" this component of delivered costs and create an estimate for realized commodity prices paid by the plant. The following clarifies my assumptions concerning transportation costs.

Hawthorn receives its fuel supply from the Southern Star. In its Index of Customers, Southern Star reports a 40,000 MMbtu per day firm capacity reservation for the Hawthorn plant which dates to 1997.[11] No public data is available on the rate Southern Star is charging for this reservation though, and because of the contract's long-standing history, the reservation rate could be very low. The pipeline's minimum reservation fee is $00.00 per MMbtu-day and maximum fees were less than $00.15 per MMbtu-day in the oldest record available, dating only from 2021.[12] Additionally, Evergy reports to the EIA very low total fuel costs during several months – with many months in the past 10 years reporting costs below $50,000.[13] This implies that the reservation fees paid by Evergy for Southern Star deliveries to Hawthorn may be as low or lower than as $0.04 per MMbtu-day. I have assumed a $0.04 per MMbtu-day rate for the reservation, equating to $50,000 per month. As for variable delivery costs, I have taken Southern Star's most recently posted maximum tariffs to be the rates Evergy pays for each delivered MMbtu – representing $0.03 per MMbtu under firm transport and $0.25 per MMbtu when interruptible service is required

[11] Southern Star Natural Gas Pipeline, Index of Customers March 2025 Data. Accessible at: https://csi.southernstar.com/infoPosting/DisplayPostings/IndexOfCustomers.
[12] Southern Star Central Gas Pipeline, FERC Gas Tariff (Nov. 1, 2021). Accessible at: https://csi.southernstar.com/infoPosting/DisplayPostings/RatesAndCharges.
[13] Energy Information Administration, Form EIA-923 Detailed Data Schedule 2. Accessible at: https://www.eia.gov/electricity/data/eia923/.

to supplement.[14] I was able to use EPA data on daily plant operations to estimate the amount of daily fuel consumption which exceeded the plant's firm transport reservation and assumed that deliveries above that mark were handled via interruptible service. As stated above, this methodology ultimately yielded an estimated commodity price which did not differ enough from delivered costs to meaningfully alter my analysis of Hawthorn.

IV. EVERGY'S SUPPLY PLAN FOR THE PROPOSED PLANTS COMPARED TO ITS HISTORICAL PROCUREMENT OF NATURAL GAS

Q: Why does KCC witness Grady state that Evergy's historical procurement of natural gas is not directly comparable to the planned procurement for the Viola and McNew plants?

A: Mr. Grady echoes statements from Evergy witness Kyle Olson that the proposed plants differ fundamentally from the high-heat rate peaker plants which historically made up the majority of Evergy's gas fleet.[15] Mr. Grady believes that the new plants, being lower heat rate and expected to carry baseload, should have more predictable dispatch and allow for less exposure to volatility and high costs when compared to the Company's existing fleet.[16]

Q: How have you accounted for this in your analysis?

A: I anticipated this concern and responded in my Direct Testimony by highlighting the Hawthorn plant in Kansas City, Missouri for analysis. As my testimony describes in greater detail, the Hawthorn plant contains several natural gas units which would be expected to operate as baseload generation. Additionally, Evergy has used both firm transport and advanced contracts to supply fuel for Hawthorn, similar to what is proposed for Viola and

[14] Southern Star Central Gas Pipeline, FERC Gas Tariff (Mar. 5, 2025). Accessible at: https://csi.southernstar.com/infoPosting/DisplayPostings/RatesAndCharges.
[15] Grady Direct at 67-68.
[16] *Id.*

McNew. My findings on Hawthorn, both as presented in my Direct Testimony and in the revised version above, are that the Company's procurement strategies have still been susceptible to high costs and volatility.[17] [redacted] After analyzing Evergy's procurement for existing plants, even controlling for the differences between these and the proposed plants, I find that the Company's procurement plan for Viola and McNew will continue to high costs and volatility.

V. THE LONG-TERM SUPPLY AND DEMAND OUTLOOK FOR NATURAL GAS MARKETS

Q: Besides witness Grady's specific responses to NEE's alleged deficiency, are you addressing any other part of his testimony?

A: Yes. Mr. Grady discusses the long-term supply and demand outlook for natural gas markets. He acknowledges that the US is likely to see a surge of new demand from the power sector.[20] But, he believes that the natural gas market has shown, "the ability to grow production levels commensurate with demand increases before."[21] He uses several figures from the EIA's 2023 Annual Energy Outlook to support his belief that natural gas supply

[17] Jones Direct at 15-18.
[18] *See id*. at 21-22.
[19] *Id*. at 18-20.
[20] Grady Direct at 68.
[21] *Id*.

will support long-term demand growth.[22] He also presents quotes for natural gas futures at Panhandle Eastern.[23]

Q: Do you agree with this view?

A: Partially. I agree that supply is likely to grow as demand grows, but it is important to emphasize that this growth is likely to correspond with increasing prices.

The growth in US oil & natural gas production over the last 20 years has been staggering – with today's production being much higher than in 2005 while prices at Henry Hub are significantly lower. However, it would be wrong to assume that comparably inexpensive growth will be achieved in the future. The period from 2005-2025 was a nearly unprecedented era of technological innovation, resource discoveries, and production gains in the oil and gas patches.[24] Following the successful implementation of combined horizontal drilling and hydraulic fracturing techniques in the Barnett shale basin of central Texas during the early 2000's, the following decades saw rapid development of other hydrocarbon deposits in shale basins from North Dakota to Louisiana and Wyoming to West Virginia.[25] Concurrently, producers innovated technology and practices to lower costs. Fracturing techniques were perfected, horizontal laterals were lengthened, and leading producers adopted "pad" drilling to develop their acreage with a high degree of capital factory efficiency.[26] Additionally, growth in gas production was enabled by widespread and sustained investment in pipeline infrastructure. All of these factors have

[22] *Id*.at 68-69.
[23] *Id*. at 69-70.
[24] Gregory Zuckerman, *The Frackers* (2013).
[25] Energy Information Administration (EIA), "Natural gas explained: where our natural gas comes from" (Jun. 11, 2024). Accessible at: https://www.eia.gov/energyexplained/natural-gas/where-our-natural-gas-comes-from.php.
[26] Energy Information Administration (EIA), "Drilling and completion improvements support Permian Basin hydrocarbon production" (Oct. 19, 2021). Accessible at: https://www.eia.gov/todayinenergy/detail.php?id=50016.

allowed two decades of increased natural gas production while prices today remain relatively low, despite massive spikes and crashes in the intervening years.

However, the era of cheap production growth is over. The "lowest-hanging fruit" of geologic deposits, technologic innovations, and operational improvements has been exhausted. As was on display at this year's CERAweek, oil and gas producers are now expecting that further production growth will require elevated prices which would incentivize producers to exploit more marginal acreage.[27] Secondly, the build-out of interstate gas pipeline infrastructure has slowed since 2022 as major projects have been bogged down due to regulatory and market uncertainty.[28] Where developers continue to build new natural gas pipelines, they have been largely concentrated in Texas and Louisiana where new Liquified Natural Gas (LNG) facilities need access to inland gas supplies.[29] These new pipelines do not help to serve domestic demand.

Q: Mr. Grady presents several figures from the EIA's 2023 Annual Energy Outlook. How should the Commission interpret this piece of evidence?

A: I would like to make several important distinctions for interpreting the EIA's supply and demand forecasts:

1. Those forecasts, released in early 2023, do not account for the 'surge' in demand from the power sector due to load growth. For illustration, the EIA's narrative analysis of their forecasts from that year make no mention of the words "Artificial Intelligence," "AI," or "data center."[30]

[27] David Carter, "Six key energy industry takeaways from CERAweek" (Mar. 20, 2025). Accessible at: https://realeconomy.rsmus.com/6-key-energy-industry-takeaways-from-ceraweek/.
[28] Energy Information Administration (EIA), "Natural gas pipeline project completions increase takeaway capacity in producing regions" (Mar. 17, 2025). Accessible at: https://www.eia.gov/todayinenergy/detail.php?id=64744#.
[29] *Id.*
[30] Energy Information Administration (EIA), *Annual Energy Outlook 2023*. Accessible at: https://www.eia.gov/outlooks/aeo/narrative/index.php#ExecutiveSummary.

2. The delta seen in the charts for "consumption" and "production" is resolved when applying the EIA's forecast for Liquified Natural Gas (LNG) exports. Because LNG is not "consumed" domestically, the EIA does not count it toward "natural gas consumption" though it is a major and growing component of natural gas demand.[31] Contrary to how Mr. Grady describes these charts, the total demand (domestic consumption plus exports) is equal to the EIA's supply forecast.

For these two reasons, the Commission should not consider these figures from the EIA to evidence a long-term outlook that is favorable for natural gas buyers.

Q: Mr. Grady presents recent futures quotes for the Panhandle Eastern pipeline. How should the Commission interpret this piece of evidence?

A: I acknowledge that long-term forward prices are relatively low compared to commodity forecasts from Evergy and others. As my testimony describes, such forward contracts are an important benchmark for forecasting and an important tool for risk management.

In my view, the fact that favorable futures contracts exist at this moment does not invalidate concerns that the market could see higher or more volatile prices, as futures markets are imperfect and frequently fail to predict actual prices. In the contrary, the existence of these contracts at favorable prices is an opportunity for Evergy to bring forth a conclusive supply plan which derisks a portion of its fuel needs, provides the Commission certainty concerning a portion of fuel costs, and, importantly, clarifies the extent which its fuel costs cannot be derisked.

[31] *Id.*

Given the currently favorable strip, the Commission should require that Evergy purchase advanced supply contracts or hedges to meet the predictable portion of fuel needs for the proposed plants for the first several years of operations. Doing so would lock in favorable prices, protecting consumers. It would also require greater transparency and accountability from Evergy so that the Commission can decide the efficiency and reasonableness of the proposed plants with the best and most certain information possible.

VI. CONCLUSION

Q: What is your conclusion and recommendation to the Commission?

A: The Commission should reject KCC witness Grady's arguments concerning NEE's alleged deficiency because they do not address NEE's concerns. I also recommend that the Commission disregard Grady's general characterization of the outlook for the natural gas market which I believe obscures the market risk involved.

Instead, I ask that the Commission 1) evaluate the proposed resources according to a higher natural gas forecast than Evergy has provided; and 2) consider Evergy's fuel supply plan inadequate for minimizing risk to ratepayers. Finally, I recommend that the Commission require Evergy incorporate multi-year hedges or supply contracts into its procurement plan.

Q: Does this conclude your testimony?

A: Yes.

VERIFICATION

STATE OF COLORADO)
) ss:
COUNTY OF JEFFERSON)

I, William Jones, being first duly sworn upon my oath state that I am a Senior Utilities Economics Analyst with the Council for the New Energy Economics; that I have read and am familiar with the foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief under the penalties of perjury.

William Jones

SUBSCRIBED AND SWORN to before me on this 21 day of March, 2025.

Notary Public

My Commission expires: 02/27/2029

KATLYN HANCOCK
NOTARY PUBLIC
STATE OF COLORADO
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MY COMMISSION EXPIRES 02/27/2029

CERTIFICATE OF SERVICE
25-EKCE-207-PRE

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