

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

Joint Filing Regarding Capital Plan and)
Integrated Resource Plan Reporting Formal) Docket No. 19-KCPE-096-CPL
Compliance 18-KCPE-095-MER)

NOTICE OF FILING OF STAFF'S COMMENTS

COMES NOW, the Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission”, respectively), and files its Comments regarding Evergy Metro, Inc. (“Evergy Kansas Metro”), Evergy Kansas Central, Inc. and Evergy Kansas South, Inc.’s (together, “Evergy Kansas Central”) (collectively, “Evergy”)’s update to its Integrated Resource Plan (“IRP”).

Staff recommends the Commission find that Evergy’s 2023 IRP Update filing meets the Commission authorized IRP Process Framework; however, Staff has several comments for Evergy to consider which are contained herein.

WHEREFORE, Staff submits Comments for Commission review and consideration and for such other relief as the Commission deems just and reasonable.

Respectfully submitted,
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Susan K. Duffy, Chair
Dwight D. Keen, Commissioner
Andrew J. French, Commissioner

Laura Kelly, Governor

MEMORANDUM

To: Susan K. Duffy, Chair
Dwight D. Keen, Commissioner
Andrew J. French, Commissioner

From: Nick Puga, Consultant, Bates White
Collin Cain, Consultant, Bates White
Lana Ellis, Deputy Chief of Economic Policy and Rates
Robert Glass, Chief of Economic Policy and Rates
Leo Haynos, Chief of Energy Operations and Pipeline Safety
Justin Grady, Chief of Revenue Requirements, Cost of Service, and Finance
Jeff McClanahan, Director, Utilities Division

Date: August 31, 2023

Re: Docket No. 19-KCPE-096-CPL: Staff Comments on Evergy Kansas Central and Evergy Metro 2023 Integrated Resource Plan Update

EXECUTIVE SUMMARY

On June 15, 2023, Evergy Kansas Central and Evergy Metro (Collectively Evergy) filed its 2023 Integrated Resource Plan update (IRP Update). On June 27, 2023, Evergy filed an errata to its IRP Update to correct minor errors. Staff and its consultant, Bates White (Collectively Staff), have participated in Evergy sponsored stakeholder meetings and issued discovery in this docket. Based on Staff's analysis, we recommend the Commission find that Evergy's 2023 IRP Update filing meets the Commission authorized IRP Process Framework. However, Staff does have several comments regarding the 2023 IRP Update as well as recommendations for Evergy's 2024 Triennial IRP.

BACKGROUND

On February 6, 2020, the Commission issued its *Order Adopting Integrated Resource Plan and Capital Plan Framework*. The Commission's Order approved the Capital Plan Reporting and IRP Process Framework jointly proposed by CURB, Evergy, and Staff on September 9, 2019. The Commission's Order noted that the Sierra Club wanted stakeholders to have significant involvement in the *formation* of the IRP plan and for Evergy to be required to actively solicit and

incorporate both stakeholder and Commission involvement throughout the IRP development process. In addressing this issue, the Commission specifically stated:

As a regulated public utility, Evergy has a statutory responsibility to provide "efficient and sufficient service," but is also entitled to discretion in the management of its day-to-day operations. Rather than directing Evergy to acquire specific resources, the Commission prefers an IRP process where it can direct Evergy to adhere to specific standards in formulating an IRP to be submitted for Commission review. Furthermore, the proposed IRP process provides for flexibility based on the rapidly changing environment utilities face today. Finally, all stakeholders and the Commission will have an opportunity to determine the prudence of Evergy's resource planning in any rate case in which the investments are to be included in rates. Involvement by stakeholders and the Commission during the development phase of the resource plan will create uncertainty on the part of Evergy as to whether or not prudence of a resource plan has been established during the resource planning process itself.¹

In addressing the Sierra Club's Petition for Reconsideration on several issues, the Commission addressed the rationale for the approved IRP process and specifically stated the following:

As Staff explains, Kansas law does not mandate any specific IRP process. More importantly, the IRP is designed to be flexible based on input sensitivity analysis and contingent scenario analysis. Therefore, the Commission does not want to restrict the necessary flexibility to develop an optimal portfolio. In approving the IRP process, the Commission found it provides for flexibility based on the rapidly changing environment utilities face today.²

While the Commission appreciates the Sierra Club's sincere interest in the IRP, and welcomes its participation, the Commission must balance the Sierra Club's involvement against Evergy's ability to manage its own affairs and exercise its business judgment in running its operations. As the Commission explained in its Order Adopting Integrated Resource Plan and Capital Plan Framework, Evergy is entitled to discretion in the management of its day-to-day operations. The Commission reiterates its preference for an IRP process where it can direct Evergy to adhere to specific standards in formulating an IRP to be submitted for Commission review, rather than directing Evergy to acquire specific resources.³

Finally, Staff notes that the stated purpose of the Capital Plan Reporting and IRP Process Framework approved by the Commission is:

Filing Schedule and Requirements

PURPOSE: This filing process section specifies the requirements for Evergy to demonstrate compliance with the provisions of the Capital Plan Reporting and IRP Process Framework established above. The purpose of the compliance review required by this filing process is not Commission approval of the substantive findings, determinations, or analyses contained in the filing. The purpose of the

¹ *Order Adopting Integrated Resource Plan and Capital Plan Framework*, ¶ 16 (Feb. 6, 2020).

² *Order Denying Sierra Club's Petition for Reconsideration*, ¶ 16, (Mar. 19, 2020).

³ *Id.*

compliance review required by this filing process is to determine whether Evergy's Capital Plan Reporting and IRP Process Framework complies with the stated structure and expectations outlined in this document.⁴

Between Evergy's triennial IRP compliance filings, Evergy is required to file an annual update to its IRP three months after its Missouri IRP update.⁵ Stakeholders may file comments with the Commission concerning Evergy's annual update within 30-days of the utility's filing.

ANALYSIS

Overall Methodology

We have commented previously on methodological concerns with respect to Evergy's 2021 Triennial IRP and 2022 Annual Update. Evergy's modeling and assumptions implemented in the 2022 and 2023 Annual Updates have addressed some of these concerns, specifically:

- Evergy's use of the capacity expansion optimization capability of the PLEXOS modeling software, applied as of the 2022 Annual Update, provides useful information on resource alternatives over time.
- Our recommendation that modeled scenarios (i.e., the probability-weighted combinations of load growth, natural gas price, and CO2 cases) be widened to encompass more extreme cases has effectively been addressed by incorporation in the 2023 Annual Update of third-party forecasts of natural gas prices that reflect a higher and wider spread of cases.

As we discuss below, the growing number and significance of critical uncertain factors will make the 2024 Triennial IRP particularly challenging. Evergy will need an expansive and creative evaluation approach to achieve a well-supported action plan.

Demand Side Management Programs

With respect to Demand Side Management (DSM) programs, Evergy is currently waiting for a decision in Docket No. 22-EKME-254-TAR, (*In the Matter of the Application of Evergy Kansas Metro, Inc., Evergy Kansas South, Inc. and Evergy Kansas Central, Inc. for Approval of its Demand-Side Management Portfolio Pursuant to the Kansas Energy Efficiency Investment Act ("KEEIA")*, K.S.A. 66-1283). Evergy's application in the DSM docket was filed in November 2021. As of late August 2023, there are two non-unanimous settlements and agreements (S&A) before the Commission, referred to as the "Initial Program S&A" and the "Alternative S&A". For purposes of IRP planning, Evergy modeled both programs but selected the Alternative Program ("low" DSM) as part of its Preferred Plan.⁶

⁴ *Order Adopting Integrated resource Plan and Capital Plan Framework*, Attachment A, p. 4 (Feb. 6, 2020).

⁵ *Id.*, ¶ 10.

⁶ 2023 Annual Update, p. 16 (Jun. 15, 2023).

Under the “Initial Program” (“full” DSM), 9 programs would be established (4 residential, 4 business and one pilot) at an estimated cost of \$135 million.⁷ The “Alternative Program” incorporates a subset of five programs from the Initial Program, is more focused on demand response than efficiency,⁸ and is estimated to cost approximately \$45 million. Though incorporation of “full” DSM resulted in lower overall portfolio cost over the model horizon, Evergy determined that the most prudent option was to select “low” DSM as part of the Preferred Portfolio. Evergy acknowledged that the modeling result “demonstrates the long-term value of DSM programs and their ability to delay capacity needs over time,” but justified the selection of the “low” DSM option as a way “to avoid delaying new capacity builds on the basis of “full” implementation which may not be realized.”⁹ While we do not disagree with this rationale, it is important to emphasize (consistent with Evergy’s discussion in the report) that the uncertainty is not in the expected long-term value of “full” DSM in reducing customer cost, but in the resolution of the DSM case.

Electrification

As electrification activity increases, fueled in part by federal incentive programs and the rapidly increasing availability of electric vehicles and end-use electro-technologies, energy efficiency measures offer increased value in mitigating the cost impacts of higher energy demand.

The 2023 Annual Update continues to reflect aggressive assumptions in the “high” electrification case. Evergy states its plan “to continue to monitor actual electrification activity in its service territory and update load forecasts for IRP filings.”¹⁰ Evergy expects both monitoring and forecasting of electrification impacts to be informed by the availability of programs and technology to mitigate impacts on peak demand and associated capacity requirements. We recommend that in the 2024 Triennial IRP Evergy clearly address this linkage between electrification and the value of energy efficiency measures.

DSM Outsourcing

There are numerous examples of U.S. utilities that have high levels of outsourcing in their DSM program offerings.¹¹ The robust energy efficiency product and services industry offers potential lower-cost delivery of certain utility demand-side management programs. Indeed, Evergy’s current DSM program offerings already rely to a degree on vendors and service contractors in this industry.

⁷ Combined budget for all programs in both Evergy Central and Evergy Metro.

⁸ Except in the case of programs targeting the Hard-to-Reach communities.

⁹ 2023 Annual Update, page 6.

¹⁰ 2023 Annual Update, page 126.

¹¹ See the DNV-GL Report cited in footnote 5. This report examined 25 utilities (excluding the California IOUs).

Of particular interest to Staff, would be a distinct alternative to Evergy’s currently proposed program delivery approach; for example, the issuance of an Energy Efficiency Request for Proposals (EE RFP), designed to harness competition among energy service companies, with Evergy in the role of contract manager. A parallel RFP to retain the services of an Independent Monitoring and Evaluation contractor would increase transparency in establishing whether the approach delivers materially lower energy savings costs. The EE RFP could be designed to target a subset of utility customers, such as larger commercial and industrial customers, who are typically more amenable to a less-prescriptive DSM program approach.¹²

An increased level of DSM program design and execution outsourcing, with Evergy managing an arm’s length resource acquisition process, could provide significant value to customers.¹³

Planning Under High Uncertainty

The 2023 Annual Update discusses a number of substantial uncertainties relevant to utility planning that apply not only to Evergy, but to utilities across the country.¹⁴ The range and magnitude of significant uncertainties have grown rapidly in recent years and appear likely to grow further.

Resource Accreditation

A particular source of planning uncertainty revolves around the interaction of resource mix and resource accreditation. Perhaps the most urgent challenge is that as an intermittent resource type, such as wind or solar, grows as a share of the resource mix, each additional increment of that resource type provides a lower contribution to system reliability/resource adequacy. SPP and other regional transmission organizations (RTOs) are working to modify resource accreditation – the measure of a resource’s contribution to system capacity need – to capture this reality. Since the applicable accreditation depends on an uncertain future capacity mix, this presents large challenges for resource planning.

Shifting Hours of Reliability Risk

¹² For example, WPPI issued an RFP for Energy Efficiency on August 1, 2023 seeking “large efficiency projects that reduce annual total energy consumption by 100,000 kilowatt-hours or more, and/or projects that will reduce the on-peak electrical demand by at least 20 kilowatts from 2 p.m. to 5 p.m. during the months of June, July, August and September. The program is open to all commercial, industrial, and institutional power customers receiving electric service from a WPPI member utility.” [RFP for Energy Efficiency - WPPI Energy](#)

¹³ For reference, as a result of the requirement for California IOUs to outsource 60% of their Energy Efficiency spend by 2020, PG&E engaged DNV GL to examine utility outsourcing practices and, among other things, examine how utilities bring new measures and technologies in to their portfolio, and what resources (utility or contractor) do the work. See DNV-GL, *Taxonomy of Utility Outsourcing Models*, March 5, 2017.

¹⁴ 2023 Annual Update, Section 6.2 Monitoring Changing Conditions and Maintaining Flexibility

Closely related to the resource accreditation challenge is that the system reliability focus has shifted from the annual peak load hour, typically in summer, to other seasons, and other hours of the day. This is also driven significantly by the growth of intermittent generation resources, which have greater reliability value in certain seasons and hours than others. It is no longer sufficient to demonstrate adequate capacity to meet peak load; utilities face an uncertain target for capacity mix and quantity over time.

Other Uncertain Factors

Evergy addresses a range of other critical uncertain factors that have grown in significance, including commodity fuel costs, renewable resource construction costs, the SPP interconnection queue process, load growth (including electrification and economic development), CO2 policy, and plant retirements.

IRP Modeling

The 2023 Annual Update makes a number of references to Evergy’s intent to monitor changing conditions and to maintain flexibility as a method of managing uncertainty. Such intentions are reasonable, but not necessarily sufficient to ensure a robust planning process. At discrete points, decisions must be made and actions taken that will depend on a *particular* view of the likely future, and result in a reduction in flexibility. For example, committing to a combined cycle addition by a given date necessarily eliminates other resource options.

We are not confident that the basic analysis framework represented in the 2021 Triennial IRP and the subsequent 2022 and 2023 Annual Updates is sufficient to address the range and magnitude of uncertainties that Evergy has identified. Load, natural gas prices, and effective CO2 emissions cost will undoubtedly continue to be key drivers of the most “robust” portfolio, but other factors may have equal or greater significance – particularly capacity accreditation and shifting reliability risk, both functions of uncertain system resource mix (as well as SPP administrative decisions).

There are no clear solutions to this challenge, but we encourage Evergy to think expansively and creatively about how to enhance the IRP modeling and analysis to identify plans that are robust over highly uncertain potential futures. We note that in the current dynamic and uncertain environment, annual IRP updates will likely have greater relevance in informing needed course corrections.

RECOMMENDATION

Based on Staff’s analysis, we recommend the Commission find that Evergy’s 2023 IRP Update filing meets the Commission authorized IRP Process Framework. Staff also recommends that, Evergy consider Staff’s comments and recommendations outlined above.

CERTIFICATE OF SERVICE

19-KCPE-096-CPL

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Staff's Comments was served via electronic service this 31st day of August, 2023, to the following:

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