

BEFORE THE STATE CORPORATION COMMISSION

In the Matter of the Capital Plan)
Compliance Docket for Kansas City)
Power & Light Company and Westar) Docket No. 19-KCPE-096-CPL
Energy, Inc. Pursuant to the)
Commission's Order in Docket No.)
18-KCPE-095-MER)

EVERGY KANSAS
RESPONSES TO INTERVENOR COMMENTS

COMES NOW, Evergy Kansas Central, Inc., Evergy Kansas South, Inc. (together as “Evergy Kansas Central”), and Evergy Metro, Inc. d/b/a Evergy Kansas Metro (“Evergy Kansas Metro”) (all collectively referenced hereinafter as “Evergy” or the “Company”) herby submits to the Kansas Corporation Commission (“Commission”) this response to the comments filed on August 31, 2023 by the Staff of the Kansas Corporation Commission (“Staff”), Citizens’ Utility Ratepayer Board (“CURB”), Climate + Energy Project (“CEP”), Kansas Electric Power Cooperative, Inc. (“KEPCo”), Council for New Energy Economics (“NEE”), and Sierra Club regarding the Company’s 2023 Integrated Resource Plan (“IRP”) Annual Update.

RESPONSE TO STAFF

1. In addition to recommending the Commission find that Evergy’s IRP Annual Update meets the requirements of the IRP Process Framework, Staff’s response offered the following recommendations and comments for the Company’s 2024 Triennial IRP.
2. Regarding Demand Side Management Programs and Electrification, Staff states that as electrification activity increases, energy efficiency measures offer increased value in mitigating the cost impacts of higher energy demand.

3. **Staff Recommendation 1:** *We recommend that in the 2024 Triennial IRP Evergy clearly address this linkage between electrification and the value of energy efficiency measures.*

4. **Response:** In the 2024 IRP Evergy can clarify how actual electrification activity will be monitored in the service territory and how it will be incorporated in the load forecast.

5. Regarding DSM Outsourcing, Staff notes the robust energy efficiency product and services industry offers potential lower-cost delivery of certain utility demand-side management programs.

6. **Staff Recommendation 2:** *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.*

7. **Response:** Evergy already extensively uses third-party implementers for delivery of its DSM programs similar to the role of contract manager. Evergy regularly selects the implementers through a competitive RFP process. Evergy's proposal also plans for the hiring of an independent monitoring and evaluation contractor.

8. When addressing IRP modeling and considering the changing conditions that impact the flexibility of the resource planning process, Staff acknowledges the basic analysis framework set forth in this docket may not be sufficient to address the range and magnitude of uncertainties identified.

9. **Staff Recommendation 3:** *Staff encourages 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.*

10. **Response:** Evergy appreciates Staff's review and comments on improvements made in the 2023 Annual Update. Evergy continues to evaluate enhancements to modeling approaches to

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enable more multi-faceted evaluation of resource plans in an increasingly dynamic and uncertain planning environment and looks forward to ongoing discussion with Staff and other stakeholders on those enhancements going forward.

RESPONSE TO CURB

11. CURB shared in its response that it finds that Evergy's 2023 IRP Annual Update complies with the Commission's Orders and the IRP Process Framework but notes that Evergy has not adopted a number of recommendations from 2022's comment period. CURB reiterates the choice to continue to utilize certain assumptions in the modeling that parties previously found lacking may lead to more criticism about Evergy's investments in the future. CURB offered comments and suggestions in the following areas:

12. **Owned Resources vs. Power Purchase Agreements ("PPAs") - CURB Recommendation 1:** *Evergy's continued reliance upon ownership status to evaluate resources versus as a PPA should be reexamined by the Company ahead of its triennial update. CURB appreciates the Company wanting to maintain consistency in its methodology for comparison purposes but shares in Staff's and other parties' preference for including PPAs for resource planning. Even if the Company believes that adders should be accounted for to properly compare PPA to ownership in terms of costs and benefits, they should not be used to categorically exclude PPAs from general planning, in order to obtain a more holistic view of resource acquisition. To continue to do so may not only skew future analyses in the IRP but will likely be a contentious point between the Company and stakeholders.*

13. **Response:** Evergy believes that the purpose of the IRP is to evaluate generic resource options and not to determine ownership or financial structures. The Company believes that ownership is the appropriate default option to represent new resources being evaluated. In practice, the Company will select the best value assets among the options presented in RFPs and negotiation and consider different financial and ownership structures at that time.

RESPONSE TO CEP

14. CEP identified two alleged deficiencies in Evergy's Annual Update.

15. **CEP Alleged Deficiency 1:** *Evergy did not choose the most cost-effective Alternative Resource Plan (ARP).*

16. **Response:** Evergy does not agree that this is a deficiency. Consistent with the Capital Plan Reporting and IRP Process Framework, the 2023 IRP Annual Update documented the rationale for not selecting the plan with the lowest net present value revenue requirements.

17. **CEP Alleged Deficiency 2:** *Evergy should consider emissions reduction when selecting its preferred ARP.*

18. **Response:** Evergy does not agree that this is a deficiency. Evergy complies with environmental regulations and legal mandates. The IRP and Capital Plan Framework does not require Evergy to consider emissions reductions. Evergy's planned coal retirement dates, which were selected in the 2021 Triennial IRP, enable Evergy to meet its carbon reduction goals.

RESPONSE TO KEPCO

19. KEPCo's comments acknowledge that Evergy's IRP Annual Update incorporates notable improvements over the prior filings and encourages further refinement and improvements to the IRP process in advance of the triennial study. The Company submits its response to each of the following discussion points and recommendations:

20. **KEPCo Recommendation 1:** *Evergy's triennial analysis should include the retesting of all retirement dates due to the material reduction in environmental retrofit costs associated with Jeffrey Units previously attributed to baghouse installations that Evergy has determined are no longer necessary.*

21. **Response:** Evergy does not believe additional retesting is required in the Triennial filing based on the change to Jeffrey environmental retrofit costs because the majority of the retirement scenarios evaluated in the 2021 Triennial were evaluated again in the 2023 Annual Update which incorporated this change. The exception is that additional early (pre-2025) retirement scenarios and additional accelerated retirements for Jeffrey Unit 1 were tested in the 2021 Triennial. These scenarios were not economic in 2021 and removing go-forward costs from Jeffrey in those cases

would either have no impact or worsen retirement economics compared to the Triennial analysis. However, Evergy will review analysis performed in the 2021 Triennial and determine what additional retirements need to be re-evaluated based on the latest information in the upcoming 2024 Triennial.

22. KEPCo Recommendation 2: *Evergy should retest all the retirement dates studied in its 2021 IRP since none of those ARPs used Plexos capacity expansion software, and as explained in KEPCo's comments to the 2022 Annual Update, Evergy's hand-selected resource additions were prone to exaggerated new-build costs due to poor capacity expansion decisions.*

23. Response: Evergy does not believe additional retesting is required in the Triennial filing based on the implementation of capacity expansion modeling because the majority of the retirement scenarios evaluated in the 2021 Triennial were evaluated again in the 2022 and 2023 Annual Updates which incorporated this change. The exception is that additional early (pre-2025) retirement scenarios and additional accelerated retirements for Jeffrey Unit 1 were tested in the 2021 Triennial. These scenarios were not economic in 2021 and removing ongoing costs from Jeffrey in those cases would either have no impact or worsen retirement economics compared to the Triennial analysis. However, Evergy will review analysis performed in the 2021 Triennial and determine what additional retirements need to be re-evaluated based on the latest information in the upcoming 2024 Triennial.

24. KEPCo Recommendation 3: *Evergy should perform a comprehensive analysis of portfolio options under scenarios where selective catalytic reduction ("SCR") retrofits are deemed unnecessary for one or both Jeffrey Units. Evergy should also subject these alternate resource plans ("ARPs") to testing under each of the Critical Contingency Factor scenarios that Evergy has used to study other ARPs.*

25. Response: This analysis was performed for the 2023 Annual Update and is not expected to produce materially different results in the Triennial analysis. However, Evergy will review the relevant inputs for these scenarios in the course of its development of the Triennial, determine

whether updates are necessary, and communicate the scope of those input and scenario updates to stakeholders.

26. In previous comments, KEPCo raised concerns that Evergy's methodology previously required retirement of thermal generating units within the relevant 20-year planning period, resulting in a skewed analysis that merely tested the cost difference between building new renewables earlier in the planning period, compared to building new thermal resources later in the planning period. KEPCo recommended that Evergy study more realistic timelines and "test variations and different combinations of retirement dates for each of the Jeffrey Units 1, 2, and 3, and Iatan Unit 1" beyond the 20-year planning period. KEPCo contends Evergy has only partially responded to these concerns by incorporating one new ARP (BHAA) that models retirements beyond the 20-year planning horizon. KEPCo further states that multiple options should be considered to allow for a logical, staggered approach to retirement.

27. KEPCo Recommendation 4: In the upcoming triennial analysis, Evergy should meaningfully study several portfolio options that contemplate staggered retirement of generating units at various intervals within and beyond the 20-year planning period to determine which unit retirements would result in the optimal resource portfolio.

28. **Response:** Evergy will continue to evaluate changes to retirement dates in ongoing planning leading up to the retirements of Jeffrey 1, 2, 3 and Iatan 1. These retirements are all currently identified between 2030 and 2039. As stated in the 2023 Annual Update, the economics of an accelerated (2030) retirement of Jeffrey 2 and 3 are largely dependent on future environmental regulations which will be monitored over the course of the next seven years to determine whether they are expected to materialize and require large upgrades. Jeffrey 1 and Iatan 1 are both identified for retirement in 2039 which means they will be assessed through ongoing planning processes over the next 15+ years before retirement decisions would need to be finalized

based on those dates. Asking to test retirements “beyond the 20-year planning horizon”, particularly for these late-period retirements, is misleading because the IRP only looks at the 20-year planning horizon and thus “planning” for these retirements outside of the planning horizon would simply mean *not* planning for them within the IRP. Evergy believes the more appropriate approach is to assess necessary changes to long-term plans over time as more information is available. This approach allows for ongoing flexibility as plans need to change but does not simply kick decisions to the future where they may have to be made reactively.

29. KEPCo expressed concern over price increases for wind and solar resources resulting in stark changes to Evergy’s resource decisions in the IRP while having limited impact to the 2023 Capital Plan ** [REDACTED]

[REDACTED]

[REDACTED] **

30. **KEPCo Recommendation 5:** *Since Evergy’s IRP analysis is what determines these planned capital expenditures for new generation, it is imperative that the IRP analysis is designed to provide objective analysis of optimal resource decisions and evaluates resource portfolios that will meet the affordability and reliability needs of all Kansas end users.*

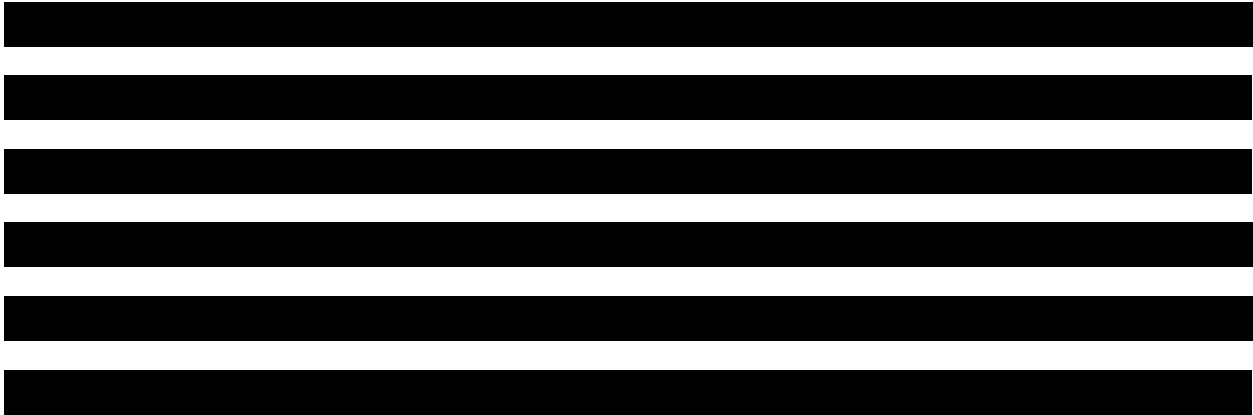
31. **Response:** The IRP is designed to comply with the IRP framework in Kansas which has a stated goal of selecting the “portfolio of resources which meets customer requirements at the lowest reasonable cost *given an uncertain future*”¹. The fact that the Capital Plan ** [REDACTED]

[REDACTED] **

does not mean that either the IRP or the Capital Plan filing are flawed. ** [REDACTED]

[REDACTED]

¹ Order Adopting Integrated Resource Plan and Capital Plan Framework, Feb. 6, 2020, ¶ 17.



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RESPONSE TO COUNCIL FOR THE NEW ENERGY ECONOMICS (“NEE”)

32. NEE engaged Energy Futures Group (“EFG”) to evaluate Evergy’s 2023 Annual Update. Based on this evaluation of the Company’s 2023 Annual Report, the following recommendations were offered for the 2024 Triennial Filing.

33. **NEE Recommendation 1:** *Provide the Company’s PLEXOS modeling files with future IRPs and IRP Updates to facilitate transparency and stakeholder review.*

34. **Response:** The Company provided all input and output files as well as copies of the full PLEXOS model in both Excel and xml formats as responses to data requests.

35. **NEE Recommendation 2:** *Update thermal capital costs to account for the current inflationary environment.*

36. **Response:** The company refreshed capital costs for all new build options as part of the 2023 IRP Annual Update. Evergy used a professional engineering firm to study and recommend technologies and sites for new thermal generation. The estimates provided in the IRP reflect current knowledge of region and technology specific costs.

37. **NEE Recommendation 3:** *Loosen build constraints for new renewables and battery storage resources.*

38. **Response:** Build constraints were incorporated in the model to allow Evergy to develop or procure resources at a reasonable pace considering capital constraints, project availability, and the capacity of the team to assess, negotiate, and execute projects.

39. **NEE Recommendation 4:** *Evaluate the impact of the Energy Community bonus adder for projects that could be located at retiring coal plants.*

40. **Response:** Evergy does not feel that this is a deficiency of the IRP process. The IRP is evaluating the addition of “generic” resources. During the evaluation in the IRP, it does not make sense to model speculative tax adders that may or may not apply to an individual project. During project contracting and selection specific tax incentives will be evaluated for an individual sites.

41. **NEE Recommendation 5:** *Explore earlier retirement dates and broaden the combination of retirements evaluated.*

42. **Response:** The retirement dates were chosen to avoid large capital spends which were forecasted around the middle of the planning horizon. For the 2024 Triennial filing, Evergy will assess whether there are other dates that make sense based on opportunities for capital savings.

43. **NEE Recommendation 6:** *Include the evaluation of coal to gas conversion options.*

44. **Response:** The Company will continue to evaluate coal to gas conversions as options.

45. **NEE Recommendation 7:** *Explore the impacts of securitization on those plans that advance coal retirement dates.*

46. **Response:** On a case-by-case basis, securitization is a tool that the Company will evaluate using when appropriate. However, any resource plan that employs securitization on any asset will appear more cost-effective than that same resource plan with balance-sheet financing. As a result, Evergy does not believe it is appropriate to include coal plant securitization in the economic evaluation of resource plans. Because securitization reduces the financing cost on anything that is securitized, it also follows that the bigger the asset, the more savings that can be gained. This type

of result is misleading, because net book value is a sunk cost, and securitization of any sunk costs of the same size would lead to the same result. Evergy believes that the correct economic analysis focuses on minimizing going forward costs.

47. **NEE Recommendation 8: Model renewable and storage assets under owned and contracted ownership assumptions.**

48. **Response:** The Commission has previously ruled in this docket that owned vs. contracted ownership assumptions are beyond the scope of the IRP framework.²

49. **NEE Recommendation 9: Explore reusing injection rights or retiring generators.**

50. **Response:** Evergy agrees that reusing interconnection rights may facilitate resource additions, due to the highly backlogged SPP Interconnection Queue. Evergy considers this in its resource procurement activities, but the opportunities to reuse interconnection rights are highly resource-specific and thus not something that can be assumed for “generic” future resource additions.

RESPONSE TO SIERRA CLUB

51. Sierra Club has requested that the Commission order Evergy to address the below-listed alleged deficiencies the Company’s forthcoming 2024 Triennial IRP filing.

52. **Sierra Club Alleged Deficiency 1: Evergy did not adequately model coal unit operations, leading the modeling to be biased towards keeping units on-line.**

53. **Response:** The economic modeling for the IRP assesses how to most cost effectively meet customer needs for capacity and energy over the 20-year horizon. The economic assessment of coal plant retirement decisions includes whether the going-forward costs merit continued operation

² Order on Joint Filing Regarding Proposed Resolutions to Concerns Raised with Triennial 2021 Integrated Resource Plan, May 12, 2022, ¶ 9, in reference to Sierra Club 6.

of the resource or whether it is more cost effective to build new resources to meet customer needs. The primary driver of the Jeffery retirement decisions is the expected capital spend on emissions control equipment. Based on current forecasts, Evergy could economically replace Jeffery 2 & 3 for a lower total cost (fixed and variable) as part of a resource plan that meets customer needs. Other coal resources, with lower capital spend forecasts, cannot be economically replaced if their retirement is accelerated. While operational performance is important, it is unlikely that small differences in operational assumptions would materially impact coal plant retirement decisions. However, Evergy will review its modeling inputs to see if heat rates or other operational characteristics should be revised based on current resource performance.

54. *Sierra Club Alleged Deficiency 2: Evergy's selection of new resources is grossly biased towards new gas and against clean energy.*

55. **Response:** The IRP was run with capacity expansion in place in order to produce a plan that optimized the outcome across many different scenarios and futures. No bias on any technology was applied and instead the model was allowed to select the resource mix it found to best balance outcomes across those futures.

56. *Sierra Club Alleged Deficiency 3 Evergy should more actively argue for more transmission.*

57. **Response:** This comment seems irrelevant to Evergy's IRP process and is instead focused on Evergy's engagement with SPP on transmission planning. Evergy is actively involved in the SPP stakeholder process and advocates that SPP utilize realistic assumptions for future resource mixes to ensure transmission portfolios are identified that align with those resource mixes, with appropriate cost allocation methodologies in place to ensure costs for those portfolios are allocated appropriately. Evergy, SPP, and other SPP members must balance the benefits of additional

transmission in enabling interconnection of new capacity, alleviating congestion, or improving reliability with the cost of those transmission investments.

58. Sierra Club Alleged Deficiency 4: *Evergy should apply for Department of Energy funding under the Energy Infrastructure Reinvestment provision of the Inflation Reduction Act to lower costs of replacing the coal units with clean energy.*

59. Response: Evergy is evaluating the Energy Infrastructure Reinvestment provision of the IRA. The EIR will not impact the infrastructure costs to replace retiring coal units, but rather could lower the financing costs by providing access to lower interest rate debt. The Company will continue to evaluate the opportunity to leverage the EIR, as well as other federal incentives, to lower the cost of its responsible generation fleet transition.

60. Sierra Club Alleged Deficiency 5: *Evergy should work with Kansas and Missouri stakeholders to successfully implement Solar for All to benefit its low-income customers and system resilience.*

61. Response: Evergy does not agree that this is a deficiency. The Company will work with stakeholders to promote any applicable Commission-approved programs along with other social service programs designed to help customers with utility resources, weatherization programs and bill options.

62. Sierra Club Alleged Deficiency 6: *Evergy should be responsive to the interest of its customers. Its customers continue to favor the development of clean energy resources over fossil burning power plants.*

Response: Evergy serves a diverse mix of customers with a diverse mix of fuels. Different customers favor different generation mixes. Evergy is committed to conducting an IRP that results in a balanced approach to its supply side mix across a number of different futures and in concert with its goals around affordability, reliability, and sustainability.

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WHEREFORE, the Company respectfully submits its responses to comments by Staff, CURB, CEP, KEPCo, NEE, and Sierra Club.

Respectfully submitted,

!s! Cathryn J. Dinges

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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

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 2nd day of October, 2023.


Notary Public

My Appointment Expires: May 30, 2026



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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed, this 2nd day of October 2023, to all parties of record as listed below.

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