

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of a Determination of Special Contemporary Resource Planning Issues to be Addressed by Evergy Missouri Metro in its Next Triennial Compliance Filing or Next Annual Update Report)) File No. EO-2023-0100

In the Matter of a Determination of Special Contemporary Resource Planning Issues to be Addressed by Evergy Missouri West in its Next Triennial Compliance Filing or Next Annual Update Report)) File No. EO-2022-0101

SIERRA CLUB’S LIST OF SUGGESTED SPECIAL CONTEMPORARY ISSUES

Pursuant to 20 CSR 4240-22.080(4), Sierra Club hereby recommends the following as special contemporary issues for consideration, analysis, and documentation by Evergy Missouri, Inc. and Evergy Missouri West, Inc. (collectively, the “Company”):

1. Update all modeling and planning scenarios to incorporate the Inflation Reduction Act, which fundamentally changes the resource planning landscape. Such updates should include, without limitation, consideration of:
 - a. Expanded and Extended Clean Energy Tax Credits. Evergy should revise its modeling to include the expanded tax credits. Under the IRA, all zero emitting resources will be permitted to take a 30% Investment Tax Credit (“ITC”) or a Production Tax Credit (“PTC”) valued at \$25/MWh if the generator pays prevailing wages.¹ Such projects are eligible for a 10% adder if the project is located in an “energy community,” generally defined as one with a history of fossil fuel generation, extraction, transport, or processing, a brownfield, or where

¹ Inflation Reduction Act, Section 13701 and 13702.

a coal-burning electric generating unit or coal mine has closed.² Zero emitting resources are also eligible for an additional 10% increase to the credit if U.S. manufactured components are used.³ The expanded credits extend for construction that begins at least through December 31, 2032.⁴ Evergy should be ordered to model zero-GHG-emitting resources that qualify for the “base” credits and those that would receive the bonus credits.

- b. Low-Income Community Energy Credits.⁵ The Inflation Reduction Act provides even larger tax credits for small-scale solar and wind facilities that service low-income communities. In its IRP, Evergy should be ordered to explore options for taking advantage of those credits to the benefit of its customers.
- c. Electric Transmission. The Inflation Reduction Act⁶ and the Infrastructure Investment and Jobs Act⁷ provide vast subsidies and streamlined siting for new electric transmission lines that facilitate construction of clean energy or that better connect the grid. Evergy should be ordered to ensure that Missouri and Kansas taxpayers get their share of these benefits by exploring opportunities to secure funding for new transmission, including better interconnection between SPP and MISO.

- 2. Analyze and develop as candidate resource options the satisfaction of Kansas City’s municipal clean energy goals.

² Inflation Reduction Act, Section 13701 and 13702.

³ Inflation Reduction Act, Section 13701 and 13702.

⁴ Inflation Reduction Act, Section 13701 and 13702.

⁵ Inflation Reduction Act, Section 13103.

⁶ Inflation Reduction Act, Section 50151 and 50152.

⁷ Infrastructure Investment and Jobs Act, Sec. 40105.

- a. On August 25, 2022, the Kansas City, Missouri City Council passed the Kansas City Climate Protection and Resiliency Plan.⁸ Among other things, this plan calls for Evergy to retire its Hawthorn coal plant by 2025 and all other coal plants by 2030, while transitioning to renewable energy more rapidly.⁹
3. Analyze and document the net present value of continuing to operate each of Evergy’s coal-burning units, including consideration of known and potential compliance costs. Evergy should be ordered to study whether retaining each unit in operation benefits customers in comparison with an alternative suite of resources.
4. Analyze the comparative public health impacts of each of the alternative resource plans considered by the Company.
 - a. At a minimum, the Company should quantify the public health impacts of each generating unit by evaluating the cost that each generating unit’s emissions have on public health, including consideration of, but not limited to, sulfur dioxide (SO₂), nitrogen oxides (NO_x), particulate matter (PM), and mercury, using publicly available resources and data (such as EPA’s BenMAP-CE, EPA’s EJSCREEN, and Missouri Department of Natural Resources Air Quality Reports). Evergy has previously stated that it “does not support”¹⁰ the consideration of public health impacts. However, compliance with Missouri IRP

⁸ City of Kansas City, Missouri Press Release, *Council approves Climate Protection and Resiliency Plan*, Aug. 25, 2022, available at <https://www.kcmo.gov/Home/Components/News/News/1936/625>.

⁹ See City of Kansas City, Missouri, *Climate Protection and Resiliency Plan*, available at <https://playbook.kcmo.gov/cprp-mobilize>.

¹⁰ Evergy’s Response to Suggested Special Contemporary Issues at 8, File No. EO-2021-0067 & EO2021-0068 (Oct. 8, 2020).

Rules requires consideration of pollutants, including air emissions,¹¹ and the “fundamental objective” of the IRP process is “to provide the public with energy services that are safe . . . and in a manner that serves the public interest,”¹² thus Evergy should document the quantified health impacts of each portfolio in its IRP as public health is an aspect of the general public interest.

Respectfully submitted,

/s/ Sarah Rubenstein _____

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¹¹ 20 CSR 4240-22.060(4)(B)(7).

¹² 20 CSR 4240-22.010(2).

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 15th day of September, 2022, to all counsel of record.

/s/ Sarah Rubenstein
Sarah Rubenstein