

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, Inc. d/b/a ) File No. EO-2022-0055  
Evergy Missouri Metro in its Next Triennial )  
Compliance Filing Triennial Compliance )  
Filing or Next Annual Update Report )

In the Matter of a Determination of Special )  
Contemporary Resource Planning Issues to be )  
Addressed by Evergy Missouri West, Inc. d/b/a ) File No. EO-2022-0056  
Evergy Missouri West in its Next Triennial )  
Compliance Filing Triennial Compliance )  
Filing or Next Annual Update Report )

**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. 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 (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), 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”<sup>1</sup> the consideration of public health impacts. However, compliance with Missouri IRP Rules requires consideration of pollutants, including air emissions,<sup>2</sup> 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,”<sup>3</sup> 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.

2. Analyze and document whether inclusion of all-source procurement (e.g., an all-source request for proposals or request for information) into Evergy’s IRP process could have benefits for customers by providing robust market data on available supply- and demand-side resources and by allowing the Company to efficiently contract with advantageous offers received.
3. Given the recent passage of House Bill 734, analyze and quantify how securitization can be used to support cost-effective accelerated retirement of coal generation assets while also channeling the savings into cost-effective investments such as demand-side management, wind and solar generation, and storage.
4. Analyze and document the criteria by which Evergy’s generating units are assigned “must run” status in the SPP energy market.
5. Analyze and develop as candidate resource options the satisfaction of municipal and corporate renewable energy goals.

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<sup>1</sup> Evergy’s Response to Suggested Special Contemporary Issues at 8, File No. EO-2021-0067 & EO-2021-0068 (Oct. 8, 2020).

<sup>2</sup> 20 CSR 4240-22.060(4)(B)(7).

<sup>3</sup> 20 CSR 4240-22.010(2).

- a. Kansas City has strong history in the areas of climate and clean energy policy. Resolution 180475 was adopted by the City Council of Kansas City in July 2018, stating that “the City has a responsibility to its residents, the country, and the world, to accelerate the transition to 100% clean, renewable energy” and committing the Mayor and Council to “supporting a communitywide goal of 100% clean renewable energy as soon as possible.” On May 14, 2020, the City Council of Kansas City adopted a new resolution strengthening the City’s climate and clean energy commitments. Resolution 200005<sup>4</sup> established, among other things
    - i. That the City “reaffirms that climate protection and greenhouse gas reduction should be key factors in all decisions and actions by the City.”
    - ii. A goal of reducing greenhouse gas emissions from municipal operations from 2005 levels by 100% by 2022 for emissions related to electricity consumption.
    - iii. A goal of reducing citywide greenhouse gas emissions from 2005 levels by 100% by 2030 for emissions related to electricity consumption.
  - b. Many corporations that do business in Evergy’s service territory have corporate renewable energy goals as well. Accordingly, Evergy should develop some candidate ARPs that would achieve 100% clean energy by 2030 and 2035.
6. Generate, analyze, and evaluate plans using a capacity expansion model that prioritizes economic optimization.

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<sup>4</sup> Available at <https://www.kcmo.gov/home/showpublisheddocument/6234/637442285970170000>.

- a. As Sierra Club explained in prior IRP comments,<sup>5</sup> Evergy models pre-selected portfolios where unit retirements and replacement resources are fixed. Evergy models these hard-coded portfolios under three “critical uncertain factors” including load growth (low, mid, and high), gas price (low, mid, and high), and carbon regulation (with and without). While we agree that these three factors are indeed critical and their associated risk should be evaluated in the resource plan, Evergy’s modeling is limited because it fails to allow for economic retirements or replacements in response to any of the three factors. Evergy’s methodology is problematic because it leaves potentially lower-cost portfolios unexplored—unless by utter and unlikely coincidence Evergy happened to have pre-selected the lowest-cost portfolio. Instead, Evergy should conduct capacity expansion modeling that allows for economic retirement and replacement of resources due to the key factors it has identified; this would produce an objective, optimized portfolio comprised of resources that have been economically justified.

Respectfully submitted,

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<sup>5</sup> Comments of Sierra Club, Docket No. EO-2020-0280 (May 18, 2020), *available at* [https://www.efis.psc.mo.gov/mpsc/commoncomponents/view\\_itemno\\_details.asp?caseno=EO-2020-0280&attach\\_id=2020020489](https://www.efis.psc.mo.gov/mpsc/commoncomponents/view_itemno_details.asp?caseno=EO-2020-0280&attach_id=2020020489).

**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, 2021, to all counsel of record.

/s/ Sarah Rubenstein  
Sarah Rubenstein