

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro Inc., d/b/a)	
Evergy Missouri Metro’s 2023)	Case No. EO-2023-0212
Integrated Resource Plan Annual Update)	
Filing)	

In the Matter of Evergy Missouri West,)	
Inc., d/b/a Evergy Missouri West’s 2023)	Case No. EO-2023-0213
Integrated Resource Plan Annual Update)	
Filing)	

**MOTION FOR EXTENSION OF TIME AND MOTION FOR EXPEDITED
TREATMENT**

COMES NOW The Council for New Energy Economics (“NEE”) and, pursuant to 20 CSR 4240-2.050(3)(A), 20 CSR 4240-22.080(15), and 20 CSR 4240-2.080(14), files its Motion for Extension of Time and Motion for Expedited Treatment, seeking a 17-day extension of time to file comments in response to the Annual Update Summary Reports filed by Evergy Metro Inc., d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a/ Evergy Missouri West (“Evergy”). In support of its Motion, NEE states as follows:

1. NEE seeks a 17-day extension of time for stakeholders to comment on Evergy’s Integrated Resource Plan (“IRP”) Annual Updates and Annual Update Summary Reports, such that comments will be due on August 31, 2023 rather than August 14, 2023. NEE polled all parties to the cases and no party has expressed opposition to the requested extension. Further, good cause exists for such extension, as described below.

2. On January 4, 2023, Evergy filed a request for a variance from 20 CSR 4240-22.080, which requires Evergy to file its IRP Annual Updates in March 2023. Evergy requested that it be allowed to file its IRP Annual Updates no later than June 15, 2023. Evergy also sought to delay its Annual Update workshops with stakeholders from April

2023 to July 2023.

3. On February 16, 2023, the Commission granted Evergy's requested variances.

4. On June 15, 2023, Evergy filed its IRP Annual Updates in each of the respective cases and followed up with a stakeholder meeting on July 6, 2023. On July 14, 2023, Evergy filed its IRP Annual Update Summary Reports.

5. Pursuant to 20 CSR 4240-22.080(3)(D), stakeholders may file comments concerning the Annual Update Summary Reports within thirty (30) days of the utility's filing of the same, which in this case is August 14, 2023 (the first business day after the thirty-day period runs).

6. Pursuant to 20 CSR 4240-22.080(15), the Commission may extend any of the time periods specified in the IRP rules for good cause shown. Further, the Commission has general authority to extend deadlines pursuant to 20 CSR 4240-2.050(3)(A).

7. Good cause exists to extend the deadline for stakeholders to file comments concerning Evergy's Annual Update Summary Reports and the underlying IRP Annual Updates. The 2023 IRP Annual Updates contain significant changes since the 2022 IRP Annual Updates, including: updated cost information based on a new request for proposals; inclusion of incentives based on the Inflation Reduction Act; updated load forecasts based on large customer growth; expanded use of PLEXOS software for production cost modeling and capacity expansion; modified quantities and timelines for investments in wind, solar, and thermal generation; and more.

8. The requested extension will provide a reasonable amount of time for stakeholders to review and analyze these significant changes, and the Commission will

benefit from a more complete review and more thorough comments. Further, there are outstanding data requests for which Evergy has requested additional time to provide responses. The 17-day extension for comments is necessary to provide adequate time for the discovery process. Finally, as stated above, NEE has polled all parties (including Commission Staff, Evergy, and each of the intervenors) and no party has expressed opposition to the Motion.

9. NEE requests that the Commission act on this Motion by Wednesday, August 2, 2023. Expedited treatment will allow the parties to plan appropriately for the drafting and filing of comments. Further, the parties have already been polled and no party has expressed opposition, so no negative impacts will result from expedited treatment. Finally, this Motion was filed as soon as it could have been after evaluating the time required to prepare comments (including the time required to obtain responses to data requests). Accordingly, expedited treatment is appropriate under 20 CSR 4240-2.080(14).

WHEREFORE, NEE requests that the Commission grant a 17-day extension of time to file comments in response to Evergy's IRP Annual Update Summary Reports, such that comments are due on August 31, 2023. Additionally, NEE requests that the Commission act on the Motion by Wednesday, August 2, 2023.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing pleading has been emailed this July 26th, 2023, to all counsel of record.

/s/Andrew O. Schulte
Andrew O. Schulte