

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a )  
Evergy Missouri Metro’s 2022 ) Case No. EO-2022-0201  
Integrated Resource Plan Annual Update )  
Filing )

In the Matter of Evergy Missouri West, )  
Inc., d/b/a Evergy Missouri West’s 2022 ) Case No. EO-2022-0202  
Integrated Resource Plan Annual Update )  
Filing )

**COMMENTS OF THE COUNCIL FOR THE NEW ENERGY ECONOMICS**

COMES NOW, The Council for New Energy Economics (“NEE”) and respectfully files the attached Comments addressing the triennial resource planning filing of Evergy Metro Inc., d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc., d/b/a Evergy Missouri West (together, “Evergy”) in the above-referenced cases (the “2022 IRP Proceedings”) pursuant to 20 CSR 4240-22.080(3)(D). In support of its Report, NEE states as follows:

1. NEE is a non-profit organization committed to helping utilities and energy decision-makers navigate rapidly evolving utility industry economics using neutral data and analysis. NEE’s mission is to present policy, utility and stakeholder energy decision-makers with complex utility system modeling analysis to help determine the most cost-effective path forward for the deployment of energy resources. The Missouri Public Service Commission (“Commission”) granted NEE’s application to intervene in Evergy’s 2021 Triennial Cases (Case No. EO-2022-0035 and EO-2021-0036) on April 26, 2021. On June 21, 2022, in each of the 2002 IRP Proceedings, the Commission issued an Order confirming that all parties to the 2021 Triennial Cases are parties to the 2002 IRP

Proceedings.

2. NEE engaged Energy Futures Group (“EFG”) to evaluate Evergy’s 2022 Annual Report. EFG has deep experience participating in state IRP regulatory proceedings. For example, Anna Sommer, principal at EFG, has provided expert testimony in front of utility commissions in Michigan, Minnesota, Montana, New Mexico, North Carolina, Puerto Rico, South Carolina, and South Dakota. EFG’s experience includes capacity expansion and production cost modeling, scenario and sensitivity construction, modeling of supply and demand resources, and review of forecast inputs, such as fuel prices, wholesale market prices, and load forecasts. EFG also has experience reviewing modeling performed using numerous models including Aurora, Capacity Expansion Model, EnCompass, PLEXOS, PowerSimm, PROSYM, PROMOD, SERVM, Strategist, and System Optimizer.

3. Based on EFG’s evaluation of the 2022 Annual Report, the attached Comments include several recommendations for future IRP Annual Updates and Triennials. A “Confidential Version” and a “Public Version” of the Comments are being provided based on Evergy’s previous designations of confidential information. The confidential information in the “Confidential Version” is marked with asterisks and highlighting.

WHEREFORE, NEE respectfully requests that the Commission accept these Comments. NEE also requests all other relief to which it is entitled.

Respectfully submitted,

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ATTORNEY FOR THE COUNCIL FOR  
THE NEW ENERGY ECONOMICS

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing pleading has been emailed this August 15, 2022, to all counsel of record:

/s/Andrew O. Schulte  
Andrew O. Schulte