

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 ) Case No. EO-2023-0100  
Evergy Missouri Metro in its Next )  
Triennial Compliance Filing or Next )  
Annual Update Report )

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

**THE COUNCIL FOR THE NEW ENERGY ECONOMICS' LIST OF  
SUGGESTED SPECIAL CONTEMPORARY ISSUES**

COMES NOW, The Council for New Energy Economics (“NEE”) and respectfully submits its list of suggested special contemporary issues to be addressed by Evergy Metro Inc., d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc., d/b/a Evergy Missouri West (together, “Evergy”) in the next triennial compliance filing or annual update report.

1. The supply-side impacts of the Inflation Reduction Act (“IRA”) provide for an up to 50% Investment Tax Credit (“ITC”) and an up to 120% Production Tax Credit (“PTC”) (currently valued at \$26 per MWh and escalating with inflation) as well as a bonus credit for low-income communities for projects under 5 MW. The manner in which these tax credits can be incorporated and the applicable resources included in Evergy’s integrated resource planning (“IRP”) modeling will be important to ensure least cost plans are developed.

2. The IRA also provides rebates and tax credits for energy efficient equipment

and conversion of certain end-uses to electricity. The impact of those credits should be reflected in Evergy's load forecasts and other demand-side input assumptions.

3. The IRA also includes refinancing of uneconomic generation resources with Department of Energy administered loan guarantees. Evergy should consider use of these refinancing options when determining appropriate retirement dates for its generation resources.

Respectfully submitted,

By: /s/Andrew O. Schulte

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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 September 15, 2022, to all counsel of record:

/s/Andrew O. Schulte

Andrew O. Schulte