BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the 2022 Integrated Resource Plan Annual Update for Evergy Metro, Inc. d/b/a Evergy Missouri Metro	)))	File No. EO-2022-0201
In the Matter of the 2022 Integrated Resource Plan Annual Update for Evergy Missouri West, Inc. d/b/a Evergy Missouri West	)))	File No. EO-2022-0202

COMMENTS OF RENEW MISSOURI

Renew Missouri is encouraged that Evergy's 2022 Integrated Resource Plan Annual Update ("IRP Update") includes plans to accelerate and increase the acquisition of wind assets as compared to the 2021 Integrated Resource Plan ("IRP"). In addition, Evergy's IRP Update reflects a continued commitment to significant demand-side management ("DSM") portfolios and additions of utility-scale solar. However, Renew Missouri has identified several concerns regarding the robustness of Evergy's resource planning as it relates to renewable acquisitions, DSM, plant closures, battery storage, and investments in new combined cycle natural gas ("CCNG") generation. With these comments, Renew Missouri would like to underscore the importance of Evergy's commitment in its 2021 IRP to a full-scale modeling of battery storage and solar hybrid resources in its next Triennial IRP filing.

Concerns Identified

a. Renewables

Renew Missouri encourages Evergy to consider the report prepared by Energy Futures Group ("EFG") on behalf of the Council for the New Energy Economics ("NEE") filed concurrently in this proceeding. EFG conducted extensive modeling throughout the 2021 IRP process that demonstrated the feasibility of a more robust renewable resource buildout. While

market conditions have changed since 2021, EFG's analysis remains directionally consistent with the analysis set forth in Evergy's IRP Update filing. Renew Missouri agrees with NEE and EFG that Evergy's own limitations on renewable buildouts in its modeling affect its ability to accurately evaluate the implications of the retirement of Jeffrey 2. As EFG and Evergy's analyses represent the high and low end (respectively) of renewable resource modeling, the parties should work to achieve a middle ground approach in which Evergy incorporates a higher level of renewable buildout in its IRP modeling. Finally, Renew Missouri encourages Evergy to conduct a thorough investigation into pathways in which it can "monetize" rather than "normalize" the Investment Tax Credit ("ITC"), as suggested by NEE in the 2021 IRP and comments filed concurrently in this proceeding.

Renew Missouri will also call attention to the solar provisions in the Inflation Reduction Act ("IRA"). The U.S. Senate has now approved the bill and the House is now debating, giving the IRA a high likelihood of passage. The IRA includes several solar provisions that could fundamentally alter the economics of utility-scale solar, including: an increase to the solar Investment Tax Credit ("ITC") to 30%; extending the 30% solar ITC through 2025; an option for a solar Production Tax Credit ("PTC") of $0.015/kwh through 2025; potential ITC and PTC adders for meeting certain domestic requirements; a 30% ITC for solar panel and equipment manufacturing domestically; direct cash payments in lieu of the ITC for cities and certain non-taxable entities; and some other provisions that may affect solar installation and manufacturing nationwide.[1] Renew Missouri urges Evergy to thoroughly review these provisions and model their impact in its triennial filing next year. We believe the passage of the IRA will lead to a rapid

[1] For a summary of the solar provisions contained in the Inflation Reduction Act, see this document from the Solar Energy Industries Association (SEIA): https://www.seia.org/sites/default/files/2022-08/Inflation%20Reduction%20Act%20Summary%20PDF_0.pdf

acceleration of utility-scale solar installations across the country, and Evergy should be no exception given its low level of current solar resources relative to other Midwestern IOUs.

b. Battery Storage

Renew Missouri wishes to reiterate the importance of Evergy's commitment in its 2021 IRP to fully model battery storage potential and the buildout of solar hybrid resources in its next Triennial IRP filing. Evergy's thorough modeling of battery and solar hybrid resources is critical to its plans to transition away from fossil fuel generation to cleaner sources of energy. The primary value of utility-scale battery storage is its potential to defer or replace new CCNG. Battery storage is a particularly viable option for Evergy in considering the early retirement of the Lawrence plant. Further, Renew Missouri supports the analysis of EFG/NEE that Evergy should especially consider the tax benefits solar hybrid resources provide, as batteries exclusively charged by solar resources for the first five years after construction qualify for the newly-enhanced ITC.

It is especially timely for Evergy to pursue modeling that adequately incorporates the full potential of standalone utility-scale battery storage and solar hybrid resources, as the IRA would have sweeping implications on the cost-effectiveness of utility-scale battery storage resources. The IRA not only extends the ITC as it relates to solar, but establishes a standalone ITC for energy storage technology. In addition, the IRA will grant power producers the flexibility to utilize the ITC or the PTC to sell credits to unrelated third parties for cash. The IRA further allows the "stacking" of incentives, with additional credit incentives available for projects that use a certain percentage of steel, iron, and manufactured products produced in the US.

c. DSM

Renew Missouri supports the position of NEE that Evergy should model MEEIA levels of DSM, as Evergy's MEEIA portfolio has consistently met or exceeded savings goals over the

course of its implementation. Evergy should incorporate this higher level of DSM modeling into its ongoing Market Potential Study ("MPS"), which will inform not only the next MEEIA filing, but also the next Triennial IRP. Renew Missouri urges Evergy to model more residential savings, rather than its current heavy focus on commercial and industrial programs. Renew Missouri also encourages Evergy to incorporate distributed demand response and battery incentives into its MPS modeling.

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WHEREFORE, Renew Missouri respectfully submits its Comments.

Respectfully,

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 15th day of August 2022:

/s/ Alissa Greenwald