

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 West)	File No. EO-2021-0067
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 Evergy Missouri Metro)	File No. EO-2021-0068
in its Next 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 and analysis by Evergy Missouri West and Metro:

1. Analyze and document on a unit-by-unit basis the net present value revenue requirement of the relative economics of continuing to operate each Evergy coal-fired generating unit versus retiring and replacing each such unit in light of the total costs (fuel, capital, and non-fuel O&M costs) needed to keep each unit operating as compared to the cost of other supply-side and demand-side resources.
2. Analyze the comparative public health impacts of each of the alternative resource plans considered by the Company. At a minimum, Evergy should quantify the public health cost that various air pollutants have on public health, including, but not limited to, sulfur dioxide (SO₂), nitrogen oxides (NO_x), particulate matter (PM), and mercury.
3. Analyze and develop as candidate resource options the satisfaction of municipal and corporate renewable energy goals. In Metro’s territory, that includes Resolution 200005

adopted by the City of Kansas City on May 14, 2020. That resolution requires the city to develop a comprehensive Climate Protection and Resiliency Plan and establishes a goal of reducing greenhouse gas emissions from municipal operations from 2005 levels by 100% by 2022 for emissions related to electricity consumption, and a goal of reducing citywide greenhouse gas emissions from 2005 levels by 100% by 2030 for emissions related to electricity consumption. As elements of that plan are enacted by ordinance, such elements will be legal mandates subject to the planning requirements of 20 CSR 4240-22.060(3)(A). Other cities within Evergy's service territory, most recently St. Joseph, have pledged to meet similar goals. Regardless of whether such goals yet amount to legal mandates, they present alternatives that should be modeled.

4. Analyze and document whether inclusion of an all-source procurement (e.g., an all-source request for proposals or request for information) into Evergy Missouri's IRP process could have benefits for customers.
5. Analyze and document the prospects for using securitization to support cost-effective accelerated retirement of coal generation assets and to channel the savings into cost-effective investments such as demand-side management, wind and solar generation, and storage.
6. Develop and document for use in all economic modeling and resource planning reasonable natural gas prices and CO₂ prices that fully account for the risks to Missouri customers associated with the climate crisis and climate risk.
7. Analyze and document the future capital and operating costs faced by each Evergy Missouri coal-fired generating unit in order to comply with all existing, pending, or potential environmental standards, including:
 - a. Clean Air Act New Source Review provisions;

- b. 1-hour Sulfur Dioxide National Ambient Air Quality Standard;
 - c. National Ambient Air Quality Standards for ozone and fine particulate matter;
 - d. Cross-State Air Pollution Rule;
 - e. Mercury and Air Toxics Standards;
 - f. Clean Water Act Section 316(b) Cooling Water Intake Standards;
 - g. Clean Water Act Steam Electric Effluent Limitation Guidelines;
 - h. Coal Combustion Waste rules, including compliance with removal of CCR; and
 - i. Clean Air Act Regional Haze requirements.
8. Analyze and document the cost of any transmission grid upgrades or additions needed to address transmission grid reliability, stability, or voltage support impacts that could result from the retirement of any existing Evergy Missouri coal-fired generating unit.
9. Analyze and document the criteria by which units are assigned various operational designations (e.g., “must run”) for use in all Evergy Missouri economic modeling and resource planning.
10. Analyze and document, using Evergy’s own pertinent variable cost of product data, whether Evergy Missouri West is bidding generation resources into the MISO energy market at below production costs, committing resources as “must run” even when Evergy expects to incur a negative energy market margin, or otherwise is harming ratepayers through its reliance on “must run” designations.
11. Analyze and screen electric vehicle charging infrastructure as a candidate resource option.

Respectfully submitted,

/s/ Henry Robertson

Henry B. Robertson

Great Rivers Environmental Law Center

319 N. Fourth St., Ste. 800

St. Louis, MO 63102

(314) 231-4181

hrobertson@greatriverslaw.org

Attorney for Sierra Club

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 22nd day of September, 2020, to all counsel of record.

/s/ Henry Robertson

Henry Robertson