## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

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

## EVERGY MISSOURI METRO'S AND EVERGY MISSOURI WEST'S MOTION FOR A VARIANCE TO EXTEND TIME TO FILE RESOURCE PLANS

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("Evergy Missouri Metro") and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West")(collectively "Evergy" or the "Companies"), pursuant to 20 CSR 4240- 22.080(13) and, for their *Motion for Variance to Extend Time to File Resource Plans* ("Motion") hereby request the Commission grant an extension until June 15, 2023 to file their respective annual update filings under 20 CSR 4240-22.080. In support of their Motion, the Companies state as follows:

- 1. Pursuant to 20 CSR 4240- 22.080(1) the Companies' respective resource plan annual updates are due to be filed in March 2023, approximately 20 days prior to the annual update workshop with the stakeholder group to be held on or about April 1, 2023.
- 2. The Companies hereby request an extension until June 15, 2023 for their respective filings. 20 CSR 4240- 22.080(13) permits the Companies to request a variance in the resource plan filing due date for good cause shown. With this extension, the Company will schedule the annual update workshop with the stakeholder group to be held on or about July 1, 2023.
- 3. This extension is necessary in order to allow time for incorporating key changes into the Companies' modeling. The primary change impacting this timing is that, given the passage of the Inflation Reduction Act ("IRA") and preliminary guidance beginning to be

disseminated around qualification requirements, the Companies would like to perform an updated Request for Proposals ("RFP") for new renewable and storage resources in order to ensure more up-to-date cost information is available for 2023 IRP modeling. The Companies began the process of developing an RFP in November 2022 and plan to launch the RFP in January 2023, with proposals received, evaluated, and incorporated into IRP cost assumptions in March 2023 for final modeling and preparation of an Annual Update report to be filed in June 2023. This RFP process is the Companies' critical path on finalizing the IRP and is the primary driver of the needed delay. Given the slow pace of guidance related to IRA qualification requirements (Guidebook released December 15<sup>th</sup>), the Companies were not comfortable launching an RFP earlier as developers likely would not have updated pricing for IRA implications at that point.

- 4. Additionally, the extension for filing also allows the Companies more time to: (1) incorporate updated market prices based on SPP's recent 20-year models which are being released over the next month; (2) update cost and performance assumptions for new natural gas resources to be evaluated in the IRP; (3) evaluate alternative scenarios based on a new DSM Potential Study; and (4) incorporate scenarios which evaluate the impact of mandatory Time of Use ("TOU") rate implementation on the resource plan.
- 5. The parties to the current IRP dockets (Docket Nos. EO-2022-0201/0202) have indicated that they do not oppose this request.
- 6. This extension request will not impact the timing of the Company's 2024 IRP filings.

**WHEREFORE**, Evergy Missouri Metro and Evergy Missouri West respectfully request that the Commission allow additional time to file their respective Resource Plans.

Respectfully submitted,

## |s| Roger W. Steiner

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ATTORNEYS FOR EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 4<sup>th</sup> day of January 2023.

Roger W. Steiner

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