

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-2024-0043  
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-2024-0044  
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 its 2024 triennial compliance filing.

1. The Inflation Reduction Act (“IRA”) offers an additional 10% bonus adder for the Investment Tax Credit (“ITC”) and the Production Tax Credit (“PTC”) for solar, wind, or battery storage projects located in an Energy Community. Census tracts with a coal plant closure, or those adjacent to a coal plant closure qualify as an Energy Community for the 10% ITC or PTC bonus. The number of census tracts that currently qualify, along with the census tracts that would qualify under the retirement of Evergy’s power plants, should be reflected in the modeling of alternative portfolios to evaluate the impact of the Energy Community adder on the costs of the portfolios modeled by Evergy.

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.

4. Evergy should again be ordered to provide details of its plan, if any, to utilize securitization available under the laws of Missouri and Kansas. Details should include, but not be limited to: 1) type of items to be securitized; 2) explanation for need of securitization for each item; 3) how it plans to utilize securitization for each item; 4) estimated costs of securitized items; and 5) comparison of ratepayer costs and benefits related to its IRP planning.<sup>1</sup>

5. On May 23, 2023, the EPA released its proposed Greenhouse Gas Standards and Guidelines for Fossil Fuel-Fired Power Plants<sup>2</sup> that would impose requirements on coal plants and on existing and new gas plants. Under these rules, units would need to meet performance standards to meet the requirements of the proposed rule through a combination of: reduced operations, carbon capture sequestration, and/co firing with low-GHG hydrogen. In order to capture the risk of the proposed regulation, Evergy should evaluate the cost impact of the proposed rules on existing coal, gas, and new gas resources modeled in the Triennial IRP filing.

6. Evergy should address utilization of SPP's replacement process as a means of circumventing uncertainty in the SPP Interconnection Queue, such that new resources can take advantage of existing interconnection rights of retiring units.

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<sup>1</sup> Orders Establishing Special Contemporary Resource Planning Issues, Docket Nos. EO-2022-0055 & EO-2022-0056 (establishing securitization as a Special Contemporary Issue for the 2023 Annual Updates).

<sup>2</sup> U.S. Environmental Protection Agency, *NSPS for GHG Emissions from New, Modified, and Reconstructed Electric Utility Generating Units*, <https://www.epa.gov/stationary-sources-air-pollution/nsps-ghg-emissions-new-modified-and-reconstructed-electric-utility>

Respectfully submitted,

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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, 2023, to all counsel of record:

/s/Andrew O. Schulte  
Andrew O. Schulte