

**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, Inc. d/b/a) File No. EO-2024-0043
Evergy Missouri Metro in its Next Triennial)
Compliance Filing 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 West, Inc. d/b/a) File No. EO-2024-0044
Evergy Missouri West in its Next Triennial)
Compliance Filing Triennial Compliance)
Filing or Next Annual Update Report)
)

**THE CITY OF KANSAS CITY, MISSOURI’S LIST OF SUGGESTED SPECIAL
CONTEMPORARY ISSUES**

COMES NOW Pursuant to 20 CSR 4240-22.080(4), The City of Kansas City (the “City”) hereby recommends to the Commission that it order Evergy Missouri, Inc. and Evergy Missouri West, Inc. (collectively, “Evergy”) to address the following as special contemporary issues:

INTRODUCTION

The City is one of Evergy’s largest customers. The City recognizes the growing urgency of addressing climate change and environmental inequities. In August 2022, the Kansas City Climate Protection and Resiliency Plan¹(“CPRP”) was passed by City Council. This plan sets out Kansas City’s vision for a healthier, more equitable and resilient future and includes municipal and community-wide greenhouse gas (“GHG”) emissions reduction goals. Specifically, it states that the City will:

1. Reduce citywide emissions from electricity generation 100% by 2030.
2. Advocate for the retirement of Hawthorn coal plant by 2025.

¹ <https://playbook.kcmo.gov/cprp-mobilize>

3. Advocate for the retirement of Evergy's remaining coal plants by 2030.
4. Decarbonize municipal buildings and fleets by 2030 and encourage citywide equitable building decarbonization.
5. Achieve carbon neutrality by 2040 citywide.
6. Prioritize affordability, especially for residents who experience a high energy burden.

A constructive and fruitful partnership with Evergy, coupled with the experienced guidance of this Commission, will be critical to achieving the City's goals. Kansas City's ability to achieve CPRP goals, including its carbon reduction goals, relies in part on the carbon intensity of Evergy's grid mix which, under the existing regulatory structure, Evergy and the Commission have significant influence over. The decisions made in the next Integrated Resource Plan ("IRP") process will critically impact the City's ability to meet its renewable energy and GHG reduction goals. Utility resource planning needs to not only keep pace with the changes that are happening, but also must set the pace for enabling more changes as the energy system becomes increasingly decentralized.

While the City appreciates the steps taken to analyze and consider many of these issues in Evergy's previous IRP process, the City believes that such process excluded potential pathways to meeting the City's goals that are both technically and economically feasible within the current regulatory environment. With so much at stake, stakeholders like Kansas City should have greater input about the inputs, assumptions, and scenarios that Evergy models to chart the course for equitably meeting the energy needs of its customers. Therefore, we would ask that the Commission, with stakeholder input, set values early in the IRP process for key inputs and assumptions that all parties be required to use for resource modeling. Obtaining stakeholder buy-

in on these values at an early stage will provide greater ability for stakeholders to meaningfully engage in the process.

The City, Evergy and the Commission have a collective responsibility to carefully examine how the decisions made in this venue will benefit and burden communities, particularly low-income communities of color, that are already severely burdened. Given the City's carbon reduction priorities and its call to action through the CPRP as well as the specific interest in creating an energy system that alleviates energy burdens and ensures the social, economic and health benefits of a low carbon energy sector are received by all, the City submits the suggested temporary issues.

SPECIAL CONTEMPORARY ISSUES

1. Accelerate Carbon Reduction in Evergy's Grid Mix

The CPRP identifies a goal of reducing the emissions of grid-supplied electricity to zero by 2030. Consistent with that CPRP goal as well as overarching GHG reduction targets, the City requests the Commission order Evergy to analyze and document in its next triennial compliance filing or next annual update report the following:

- i. Consider environmental justice and health impacts.
- ii. Provide licenses of Evergy's modeling software to stakeholders.
- iii. Provide modeling files as early as possible, but no later than December, 2023, to give stakeholders sufficient time to review and provide feedback, ultimately leading to a more robust stakeholder engagement process.

2. Continue Expanding Use of or Access to Renewable Energy

The CPRP identifies a number of goals related to equitably decarbonizing municipal and non-municipal buildings. Consistent with those CPRP goals as well as overarching GHG reduction

targets, the City requests the Commission order Evergy to analyze and document in its next triennial compliance filing or next annual update report the following:

- i. Consider the publicly-stated GHG reduction goals of Kansas City in the evaluation of IRP scenarios.
- ii. Include Power Purchase Agreements (“PPAs”) that have third-party ownership.

3. Maximize Use of Energy Efficiency in IRP Planning and Expand Access to Efficiency Programs for Low-Income Customers.

The CPRP identifies a number of goals related to equitably decarbonizing municipal and non-municipal buildings. Consistent with those CPRP goals as well as overarching GHG reduction targets, the City requests the Commission order Evergy to analyze and document in its next triennial compliance filing or next annual update report the following:

- i. Maximize the utilization of energy efficiency in its IRP and subsequent resource planning activities.
- ii. Pursue a virtual power plant pilot program that includes installing battery storage in households closest to power plant pollution and paying households per conservation event.

CONCLUSION

Among the core objectives of the City is the preservation and improvement of the health, economic well-being and resiliency of its citizens and community. The long-range plans proposed by Evergy will have a profound impact on the City’s ability to meet these objectives as well as its own municipal decarbonization goals. Continuing to rely on fossil fuel-based electricity generation runs counter to CPRP goals, is economically uncertain and leads to adverse health impacts, especially for low-income communities and for people of color.

The City has a rich history of partnering with Evergy on energy programs that benefit Kansas City residents, businesses and local government operations. The City looks forward and is committed to continuing to work successfully and collaboratively with Evergy to enable solutions that will accelerate a more affordable, clean, equitable, resilient and reliable energy system. Through the City's continued partnership with Evergy, including participation in this process, we can demonstrate to Kansas Citians, Missourians and the nation what collaborative, clean energy leadership looks like.

Respectfully submitted,

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ATTORNEYS FOR CITY OF
KANSAS CITY, MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand- delivered to all parties listed on the official service list on this 15th day of September 2022.

Respectfully submitted,

/s/ Andrew Bonkowski
Andrew Bonkowski