

**BEFORE THE PUBLIC SERVICE COMMISSION
FOR THE STATE OF MISSOURI**

In the Matter of a Determination of Special)
Contemporary Resource Planning Issues to be)
Addressed by Evergy Missouri West in its Next) File No. EO-2024-0043
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 in its Next) File No. EO-2024-0044
Triennial Compliance Filing or Next Annual)
Update Report)

**EVERGY MISSOURI WEST AND EVERGY MISSOURI METRO’S
RESPONSE TO SUGGESTED SPECIAL CONTEMPORARY ISSUES**

Pursuant to Missouri Public Service Commission (“Commission”) Rule 20 CSR 4240-22.080(4)(B), 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 “Company”)¹ hereby respectfully submits *its Response to the Lists of Special Contemporary Issues* suggested by the Office of Public Counsel (“OPC”), the City of Kansas City (“the City”), New Energy Economics (“NEE”), and Sierra Club (“SC”). The suggestions by the parties for special contemporary issues are identical for both Evergy Missouri Metro and Evergy Missouri West; therefore, the Company hereby submits one response for both special contemporary issue dockets.

I. INTRODUCTION

In Rule 20 CSR 4240-22.080(4)(A) parties to the Integrated Resource Plan (“IRP”) process may file a list of suggested special contemporary issues.

The definition of *special contemporary issue* is found at 20 CSR 4240-22.020(55):

¹ Effective October 7, 2019, Evergy Metro Inc. d/b/a Evergy Missouri Metro adopted the service territory and tariffs of Kansas City Power & Light Company (“KCP&L”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West adopted the service territory and tariffs of KCP&L Greater Missouri Operations Company (“GMO”).

(55) Special contemporary issues means a written list of issues contained in a commission order with input from staff, public counsel, and intervenors that are evolving new issues, which may not otherwise have been addressed by the utility or are continuations of unresolved issues from the preceding triennial compliance filing or annual update filing. Each utility shall evaluate and incorporate special contemporary issues in its next triennial compliance filing or annual update filing.

20 CSR 4240-22.080(4) characterizes special contemporary issues generally as, “evolving regulatory, economic, financial, environmental, energy, technical, or customer issues,” that utilities must adequately address in their resource planning. The Commission has provided additional guidance on the assessment of proposed special contemporary issues in its order in File No. EO-2012-0039.²

On August 25, 2023, the Commission issued, *Order Opening a File Regarding Special Contemporary Resource Planning Issues and Offering an Opportunity To File Suggestions*, directing interested parties wishing to suggest a special contemporary issue that Evergy should consider in its next Triennial IRP to file written suggestion no later than September 15, 2023. The Company has an opportunity to respond to the lists provided in accordance with Rule 20 CSR 4240-22.080(4)(A). Per the rule, Evergy’s response to the suggested special contemporary issues shall be filed by October 1, 2023.

II. OPC LIST OF CONTEMPORARY ISSUES

On September 15, 2023, OPC filed suggestions for special contemporary issues. OPC requests the Company address the following issues for Evergy Missouri Metro and Evergy Missouri West: (1) Rate Design: Pricing as a Resource Candidate; (2) Solar Adoption as a result of Inflation Reduction Act (“IRA”) subsidies; (3) Battery Storage Operation and Lifecycle Assumptions; (4)

² See, *Order Establishing Special Contemporary Resource Planning Issues*, dated October 19, 2011; Docket No. EO-2012-0039.

Estimated Generation Interconnection Costs; (5) Power Purchase Agreements (“PPAs”) as Resource Candidates; (6) Mothball Energy Generation; (7) Resource Adequacy; and (8) Modeling for Low, Medium, High Participation of Aggregator of Retail Customers (“ARCs”).

Issue 1: Rate Design: Pricing as a Resource Candidate

1. Recommends that the Commission order Evergy to:

- ***Model and explicitly present future resource adequacy scenarios based on the following assumptions:***
 - ***With demand-side rates and traditional demand-side management investments (e.g., MEEIA);***
 - ***Only demand-side rates without MEEIA investment;***
 - ***Neither demand-side rates nor MEEIA (but maintain naturally occurring energy efficiency adoption); and***
 - ***Indicate whether or not naturally occurring savings and/or federally-sponsored DSM savings are included in the modeling. If yes, these savings should be identified and separated as well.***

- ***Include an explicit section within the demand-side management volume and the executive summary where low, medium and high TOU differentials are modeled and presented with expected demand savings articulated separate and aside from other demand side management practices.***

RESPONSE: The Company can partially comply with this request with the exception of separately providing the naturally occurring savings. Naturally occurring savings are included in the modeling. The Energy Information Administration (“EIA”) data the Company utilize includes part of the EE impact from the IRA that are related to tax credits. However, the Company has no way to disaggregate the savings.

Issue 2: Solar Adoption as a result of IRA subsidies

- 2. Recommends that the Commission order Evergy to begin developing modeling scenarios assuming residential solar adoption levels that considers both naturally occurring (e.g., utility as a passive observer—homeowner-owned rooftop solar) and utility-sponsored (e.g., utility as an active participant—ratepayer-subscribed community solar or virtual solar options) solar additions as a result of federal subsidies.*

RESPONSE: The Company can partially comply. The Company is already accounting for rooftop solar adoption in the load forecast. The Company already has and tracks its solar subscription program. The Company does not have the ability to determine whether homeowner-owned solar or community adoption is a result of the IRA subsidies.

Issue 3: Battery Storage Operation and Lifecycle Assumptions

- 3. Recommends that the Commission order Evergy to provide detailed assumptions surrounding battery cycle life on any planned future investment in storage. This should include, at a minimum, expected frequency and duration of operational usage of the battery resource. In short, the analysis should be able to reasonably demonstrate that the utility-scale storage investment will be operational for X period based on articulated assumed usage pattern.*

RESPONSE: The Company can comply.

Issue 4: Estimated Generation Interconnection Costs

- 4. Recommends that the Commission order Evergy to include a model of low, medium, and high interconnection cost estimates that are supported by historic total interconnection costs by fuel type for MISO in its resource adequacy planning scenarios.*

RESPONSE: The Company will do sensitivity analysis of interconnection costs as part of the Triennial requirements. Evergy is not part of MISO and has not reviewed the study to determine its applicability to the Southwest Power Pool (“SPP”).

Issue 5: PPAs as Resource Candidates

5. *Recommends that the Commission order Evergy to Evergy Metro to issue a competitive request for proposal for PPA generation options that match their traditional planned investment over the next ten years.*

 - *Evergy Metro should provide a breakdown of the cost results, size, location and type of resources that were bid into the RFP.*
 - *Said results should be considered against traditionally owned utility investments.*

RESPONSE: As previously stated by the Company in its 2021 Triennial Compliance Filings, docket No. EO-2021-0035 and EO-2021-0036, Evergy and some parties disagree on whether PPAs should be modeled as discrete resource options. The Chapter 22 IRP rules do call out either bilateral or market purchases of capacity or energy as supply-side resource options which can be evaluated, but the Company's position is that the purpose of the IRP is to evaluate generic new resource options and not to determine ownership or financial structure. With that in mind, the Company believes ownership of new resources is the appropriate "default" option to represent new resources which are being evaluated.

In its March 29, 2022, order concerning this matter, *Order Approving 2021 Triennial Integrated Resource Plan*³, the Commission found:

The Commission agrees with Evergy and will not require any further response by the Companies to the concern of whether PPA should be modeled as discrete resource options.

³ See, *Order Approving 2021 Triennial Integrated Resource Plan*, dated March 29, 2022; Docket Nos. EO-2021-0035 and EO-2021-0036.

Issue 6: Mothball Energy Generation

6. *Recommends that the Commission order Evergy to analyze and produce estimated costs for mothballing any dispatchable generation resource that is subject to a planned retirement in the 20-year planning period. Estimates should include all costs including the minimum continued O&M of the mothballed units.*

RESPONSE: The Company does not believe this request meets the definition of a special contemporary issue. This is not an evolving new issue which may not be otherwise addressed by the utility. The Company will review the potential of mothballing dispatchable generation resources at the time that these resources are removed from service, but these decisions will be highly specific to individual resources at the time of their potential retirement. As a result, this cannot be analyzed on a generic basis over a 20-year period given the significant uncertainty around regulations and permitting for individual units at a specific time in the future. As retirements become more near-term, the Company will review relevant EPA regulations and guidance that may limit the Company's ability to mothball dispatchable generation resources at the time the unit(s) are removed from service.

Issue 7: Resource Adequacy

7. *Recommends that the Commission order Evergy to:*
 - i. *Analyze and report on the ability of the planned resource additions in Evergy's current preferred plans to continue to meet energy needs in all hours of each year. OPC is not asking that Evergy change its plan in the annual filing, but instead report on the ability of its current resource plan to meet forecasted load and consider this information in determining its preferred resource plan in its next annual update filing.*

RESPONSE: The Company can comply.

- ii. *Analyze and report on the ability of the planned resource additions in Evergy's current preferred plans to provide essential reliability services including the capability of the planned resource to support voltage, frequency, and dispatchability.*

RESPONSE: The Company does not believe this request meets the definition of a special contemporary issue. Through their generator interconnection process, Southwest Power Pool is responsible for evaluating the reliability of any requests for generators interconnecting to systems under their control, including Evergy's. Evergy includes assumed interconnection costs in the evaluation of new supply-side resources. These costs reflect an assumed level of necessary transmission investment which are identified by SPP to maintain the reliability of the transmission system.

- iii. *Analyze the risk to Evergy's customers of Evergy relying on just-in-time fuel for electric generation and the interdependent natural gas and electric infrastructure. Evergy's future IRP filings should include the results of the analysis and the measures the utility is taking to mitigate this risk.*

RESPONSE: The Company can comply.

Issue 8:

Modeling for low, medium, high participation of aggregator of retail customer ("ARCs")

1. *Evergy should model for a low, medium, and high participation scenario of commercial and industrial customers electing to participate in demand response activities based on the introduction of a third-party(s) ARC within its footprint and provide an analysis on what the impact said ARC would have on Evergy's IRP.*

RESPONSE: The Company does not believe this request meets the definition of a special contemporary issue. Furthermore, the Company provided a response to a similar request in the 2023 annual IRP update filed in June 2023 and does not need to be renewed. There have been no changes since that time that would modify the previous answer. First, there has been no change in uncertainties related to FERC Order 2222. Second, wholesale market demand response has not been shown to reduce market volatility, which tends to be driven by many other factors. Finally, third-party aggregations do not provide the Company with accredited capacity in SPP, and therefore do not

reduce the Company's capacity obligations. As explained in the response to this request provided in the 2023 annual IRP update, third-party aggregations submit bids directly to the SPP wholesale market; therefore, there is no impact to the Company's IRP resource selection.

III. CITY OF KANSAS CITY LIST OF CONTEMPORARY ISSUES

On September 18, 2023, The City filed suggestions for special contemporary issues. The City requests the Company address the following topics for Evergy Missouri Metro and Evergy Missouri West: (1) Accelerate carbon reduction in Evergy's grid mix; (2) Continue expanding use of or access to renewable energy; (3) Maximize use of energy efficiency in IRP planning and expand access to efficiency programs for low-income customers.

Topic 1: Accelerate Carbon Reduction in Evergy's Grid Mix

1. Consider environmental justice and health impacts.

RESPONSE: The Company does not believe this request meets the definition of a special contemporary issue. As stated previously, Evergy's position is that public health impacts are assessed when environmental regulations are established.⁴ Each alternative resource plan considered by the Company is based on resources that comply with environmental regulations. There are currently no regulations related to environmental justice, but, if these are implemented in the future, they will be incorporated into IRP modeling in the same way. As a result, no additional public health / environmental justice assessment is needed to evaluate alternative plans. A similar request by Sierra Club was rejected by the Commission for inclusion as a special contemporary issue in both the Company's 2021⁵ Triennial IRP, 2022 Annual Update⁶, and 2023 Annual Update.⁷

⁴ See, *Evergy Response to Suggested Contemporary Issues*, October 1, 2021; Docket No: EO-2022-0055 and EO-2022-0055.

⁵ See *Order Establishing Special Contemporary Resource Planning Issues*, dated November 4, 2020; Docket Nos. EO-2020-0067 and EO-2020-0068.

⁶ See *Order Establishing Special Contemporary Resource Planning Issues*, dated October 27, 2021; Docket Nos. EO-2021-0055 and EO-2021-0056.

⁷ See *Order Establishing Special Contemporary Resource Planning Issues*, dated October 26, 2022; Docket Nos. EO-2023-0100 and EO-2023-0101.

2. Provide licenses of Evergy's modeling software to stakeholders.

RESPONSE: The Company does not believe this request meets the definition of a special contemporary issue because it is not an evolving new issue which may not have been addressed by the utility (20 CSR 4240-22.020(55)). Furthermore, the Chapter 22 IRP rules do not require the provision of licenses to parties. The Company does not contract for excess licenses for Plexos (current IRP modeling software) and thus any change to this practice would increase licensing costs borne by Evergy's customers.

3. 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.

RESPONSE: The Company does not support this request. This request does not meet the definition of a special contemporary issue because it is not an evolving new issue which may not have been addressed by the utility (20 CSR 4240-22.020(55)). A similar request by The City was rejected by the Commission for inclusion as a special contemporary issue in the Company's 2023 Annual Update.⁸ The Company provides all modeling files as they are requested via data requests and will continue to do so. As a result, The City has access to all modeling files and the completed model used for the 2023 Annual Update. It is highly unlikely that the Company will have complete modeling files by December 2023, given all of the requirements and analysis required for the Triennial filing. The Company will continue to comply with the stakeholder engagement processes outlined in 20 CSR 4240-22.080.

⁸ See *Order Establishing Special Contemporary Resource Planning Issues*, dated October 26, 2022; Docket Nos. EO-2023-0100 and EO-2023-0101.

Topic 2: Continue Expanding Use of or Access to Renewable Energy

1. Consider the publicly-stated GHG reduction goals of Kansas City in the evaluation of IRP scenarios.

RESPONSE: The Company does not believe this request meets the definition of a special contemporary issue and does not support this request. This issue was already addressed as part of the 2023 Annual Update and the response provided in the Company’s Triennial IRP would not be materially different.

2. Include PPAs that have third-party ownership.

RESPONSE: As stated above and previously stated by the Company in its 2021 Triennial Compliance Filings, docket No. EO-2021-0035 and EO-2021-0036, Evergy and some parties disagree on whether PPAs should be modeled as discrete resource options. The Chapter 22 IRP rules do call out either bilateral or market purchases of capacity or energy as supply-side resource options which can be evaluated, but the Company’s position is that the purpose of the IRP is to evaluate generic new resource options and not to determine ownership or financial structure. With that in mind, the Company believes ownership of new resources is the appropriate “default” option to represent new resources which are being evaluated.

As stated above, in its March 29, 2022 order concerning this matter, *Order Approving 2021 Triennial Integrated Resource Plan*⁹, the Commission found:

The Commission agrees with Evergy and will not require any further response by the Companies to the concern of whether PPA should be modeled as discrete resource options.

⁹ See, *Order Approving 2021 Triennial Integrated Resource Plan*, dated March 29, 2022; Docket Nos. EO-2021-0035 and EO-2021-0036.

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

1. Maximize the utilization of energy efficiency in its IRP and subsequent resource planning activities.

RESPONSE: The Company does not believe this request meets the definition of a special contemporary issue and does not support this request. This appears to be duplicative of the planning objectives outline in the Chapter 22 IRP rules. Evergy intends to test various levels of energy efficiency, based on potential study results, and select a preferred resource plan that minimizes costs and appropriately balances risks, consistent with the Policy Objectives of 20 CSR 4240-22.010. It is not appropriate to include this suggestion as a special contemporary issue and the Commission should exclude this proposed issue from the final list of such issues. A similar request was rejected by the Commission for inclusion as a special contemporary for the Company's 2023 Annual Update.¹⁰

2. 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.

RESPONSE: This suggestion does not meet the definition of special contemporary issue. It is not an evolving new issue, which may not otherwise have been addressed by the Company. A virtual power plant ("VPP") is a control system used to dispatch dispatchable distributed energy resources such as distributed generation, battery electric storage, electric vehicles ("EV"), and other demand response technologies. A similar request was rejected by the Commission for inclusion in the Company's 2021 Triennial IRP, 2022 IRP Annual Update, and 2023 Annual Update¹¹. It is not appropriate to include this suggestion as a special contemporary issue and the Commission should exclude this proposed issue from the final list of such issues.

¹⁰ See *Order Establishing Special Contemporary Resource Planning Issues*, dated October 26, 2022; Docket Nos. EO-2023-0100 and EO-2023-0101.

¹¹ See *Order Establishing Special Contemporary Resource Planning Issues*, dated October 26, 2022; Docket Nos. EO-2023-0100 and EO-2023-0101.

IV. NEW ENERGY ECONOMICS LIST OF CONTEMPORARY ISSUES

On September 15, 2023, NEE filed six suggestions for special contemporary issues.

1. *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.*

RESPONSE: The Company does not support this request. This suggestion does not meet the definition of special contemporary issue. It is not an evolving new issue, which may not otherwise have been addressed by the Company. Evergy considers incentives as well as other locational features in its resource procurement and siting activities, but it is not appropriate to assume that "generic" future resource additions will be able to be located in specific areas.

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.*

RESPONSE: The Company does not believe this request meets the definition of a special contemporary issue and does not support this request. Incorporating such information, to the extent that it is available, is part of the normal IRP process. The Company's load forecast utilizes energy efficiency and end-use data from the Energy Information Administration ("EIA") within its load forecast. The Company will account for the impacts of the IRA on end-uses and energy efficiency to the extent EIA incorporates it into their next forecast. Regarding the DSM input assumptions, this study is already complete and there is not sufficient time to restart the study. It is not appropriate to include this suggestion as a special contemporary issue and the Commission should exclude this proposed issue from the final list of such issues.

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.*

RESPONSE: The Company does not support this request. There are too many uncertainties around project qualifications and awards to build the financing assumptions into modeling. The Company is already evaluating the Energy Infrastructure Reinvestment (“EIR”) provision of the IRA. The EIR will not impact the infrastructure investment costs required to replace retiring coal units, but rather could lower the financing costs of that investment by providing access to lower interest rate debt. The Company will continue to evaluate the opportunity to leverage the EIR, as well as other federal incentives, to lower the cost of its responsible generation fleet transition.

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.*

RESPONSE: The Company does not support this request. The suggestion does not meet the definition of special contemporary issue. It is not an evolving new issue, which may not otherwise have been addressed by the Company. This type of detailed information is most appropriately addressed when the Company seeks a securitization financing Order. A similar request offered by Missouri Public Service Commission Staff and The City was rejected for inclusion in the Company’s 2023 Annual Update¹².

5. *On May 23, 2023, the EPA released its proposed Greenhouse Gas Standards and Guidelines for Fossil Fuel-Fired Power Plants² that would impose requirements on coal plants and on existing and new gas plants. Evergy should evaluate the cost impact of the proposed rules on existing coal, gas, and new gas resources modeled in the Triennial IRP filing.*

RESPONSE: The Company can comply.

¹² See *Order Establishing Special Contemporary Resource Planning Issues*, dated October 26, 2022; Docket Nos. EO-2023-0100 and EO-2023-0101.

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.*

RESPONSE: The Company does not support this request. This suggestion does not meet the definition of special contemporary issue. It is not an evolving new issue, which may not otherwise have been addressed by the Company. Evergy already considers this in its resource procurement activities, as described in the IRP filing, but the opportunities to reuse interconnection rights are highly resource-specific and thus not something that can be assumed for “generic” future resource additions.

V. SIERRA CLUB LIST OF CONTEMPORARY ISSUES

On September 15, 2023, Sierra Club filed suggestions for special contemporary issues related to the IRA:

1. *Evergy should be ordered to address in its IRP how it intends to work with Missouri stakeholders to assure that low-income community members can reap the intended benefits of Solar for All.*

RESPONSE: The Company does not believe this request meets the definition of a special contemporary issue. This is not an evolving resource planning issue. The identification of a preferred resource plan which meets the fundamental objective outlined in the Chapter 22 IRP rules is the purpose of the IRP process. This suggestion is not an alternative resource plan nor does it impact the selection of a preferred resource plan. The Company launched in its most recent Missouri rate review¹³ an income eligible solar program. The Company supports collaborating with stakeholders to determine how to customers may “reap the intended benefits” of the program if the State of Missouri is awarded a grant through the Solar for All program.

¹³ See *Report & Order*, dated November 29, 2022; Docket Nos. ER-2022-0129 and EO-2022-0130.

2. *Evergy should be ordered to consider in its IRP an application to the U.S. DOE Energy Infrastructure Reinvestment Loan Program to lower the cost of replacing its retired or retiring coal units.*

RESPONSE: The Company does not support this request. There are too many uncertainties around project qualifications and awards to build the financing assumptions into modeling. The Company is already evaluating the Energy Infrastructure Reinvestment (“EIR”) provision of the IRA. The EIR will not impact the infrastructure investment costs required to replace retiring coal units, but rather could lower the financing costs of that investment by providing access to lower interest rate debt. The Company will continue to evaluate the opportunity to leverage the EIR, as well as other federal incentives, to lower the cost of its responsible generation fleet transition.

3. *Analyze and document the net present value of continuing to operate each of Evergy’s coal-burning units, including consideration of known and potential compliance costs. Evergy should be ordered to study whether retaining each unit in operation benefits customers in comparison with an alternative suite of resources.*

RESPONSE: The Company does not believe this request meets the definition of a special contemporary issue. This appears to be a different description of the core function of the IRP process. The Company develops alternative resource plans to determine the benefits to customers of different future portfolios, including resource additions and retirements. The net present value analysis incorporates expected market revenues, production costs, and fixed costs of each resource portfolio. This includes the known and expected compliance costs of continuing to operate coal resources, if applicable, and the revenues and costs of new alternative resources, if applicable.

4. *Evergy should conduct capacity expansion modeling that does not rely on pre-determined retirement dates for coal units to identify the most economic resource portfolio outcomes.*

RESPONSE: The Company does not believe this request meets the definition of a special contemporary issue. This is not an evolving resource planning issue. The identification of a preferred resource plan which meets the fundamental objective outlined in the Chapter 22 IRP rules is the

purpose of the IRP process. This preferred resource plan includes the selection of retirement dates based on an integrated assessment of the economics of existing resource economics as compared to alternatives. Retirements were tested based on the most logical timing - dates that would enable the resources to avoid large capital spends needed for continued operation. Evergy also tested other retirement sensitivities requested by stakeholders. Evergy included wind, solar, lithium-ion-battery, solar-hybrid, combined-cycle and combustion-turbine generators as new build options, and tested the inclusion of varying levels of demand-response programs to replace coal-fired resources and meet future customer needs. There is an enormous amount of work involved in the IRP process and it would be impractical to develop scenarios for every possible combination of retirements in every year. It would also be of little incremental value because analysis of the modeling results demonstrates that there are limitations to the amount of resources that can be retired and economically replaced while still meeting customer needs, regulatory requirements and considering other risks. While capacity expansion capability is helpful, it is not panacea. The Company will examine whether adding some additional retirement testing dates makes sense, but cannot commit to developing the modeling requested because the team has to prioritize the aspects of the modeling that are the most impactful.

5. Analyze and develop as candidate resource options the satisfaction of Kansas City's municipal clean energy goals.

RESPONSE: As stated above, The Company does not believe this request meets the definition of a special contemporary issue and does not support this request. This issue was already addressed as part of its 2023 Annual Update and the response provided in the Company's Triennial IRP would not be materially different.

6. *Analyze the comparative public health impacts of each of the alternative resource plans considered by the Company.*

RESPONSE: The Company does not believe this request meets the definition of a special contemporary issue.

As stated previously, Evergy's position is that public health impacts are assessed when environmental regulations are established. Each alternative resource plan considered by the Company is based on resources that comply with environmental regulations. As such, no additional public health assessment is needed to evaluate alternative plans. A similar request by Sierra Club was rejected by the Commission for inclusion as a special contemporary issue in both the Company's 2021 Triennial IRP, 2022 Annual Update, and 2023. Furthermore, the Commission determined in its Order Approving 2021 Triennial Integrated Resource Plan:

The Commission agrees with Evergy and will not require any further response by the Companies to the concern that Evergy failed to evaluate the public health impacts of its ARPs.¹⁴

WHEREFORE, Evergy Missouri Metro and Evergy Missouri West submit their *Response to the Lists of Special Contemporary Issues* to the Commission.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MBN 39586
Phone: (816) 556-2314
E-mail: roger.steiner@evergy.com
Evergy, Inc.
1200 Main – 16th Floor
Kansas City, Missouri 64105
Fax: (816) 556-2110

**Attorney for Evergy Missouri Metro and
Evergy Missouri West**

¹⁴*Order Approving 2022 Triennial Integrated Resource Plan*, dated March 29, 2022; Docket Nos. EO-2021-0035 and EO-2021-0036.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 29th day of September 2023.

/s/ Roger W. Steiner

Roger W. Steiner