

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a)
Evergy Missouri Metro’s 2024 Triennial) Case No. EO-2024-0153
Compliance Filing Pursuant to 20 CSR)
4240-22)

In the Matter of Evergy Missouri West,)
Inc., d/b/a Evergy Missouri West’s 2024) Case No. EO-2024-0154
Triennial Compliance Filing Pursuant to)
20 CSR 4240-22)

COMMENTS OF THE COUNCIL FOR THE NEW ENERGY ECONOMICS

COMES NOW, The Council for New Energy Economics (“NEE”) and respectfully files the attached Comments addressing the triennial resource planning filing of Evergy Metro Inc., d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc., d/b/a Evergy Missouri West (together, “Evergy”) in the above-referenced cases (the “2024 IRP Proceedings”) pursuant to 20 CSR 4240-22.080(3)(D). In support of its Report, NEE states as follows:

1. NEE is a non-profit organization committed to helping utilities and energy decision-makers navigate rapidly evolving utility industry economics using neutral data and analysis. NEE’s mission is to present policy, utility and stakeholder energy decision-makers with complex utility system modeling analysis to help determine the most cost-effective path forward for the deployment of energy resources. The Missouri Public Service Commission (“Commission”) granted NEE’s application to intervene in Evergy’s 2021 Triennial Cases (Case No. EO-2022-0035 and EO-2021-0036) on April 26, 2021. NEE has participated in each annual update since 2021 and, pursuant to 20 CSR 4240-22.020(56) and the Commission’s February 2, 2024 *Order Recognizing Parties*, is also a party to this Triennial proceeding.

2. Upon review of Evergy’s Triennial IRP filing, NEE has identified the following deficiencies and concerns:

Title	Deficiency or Concern	Chapter 22 Citation	Proposed Remedy
Supply Side Resource Analysis (Evaluation of all resources)	Concern	20 CSR 4240-22.040 (1) and 20 CSR 4240-22.040 (4)	<ol style="list-style-type: none"> 1. Evergy should continue to evaluate build limits that are binding in modeling runs for each service territory. 2. Evergy should relax the build limits applied to wind resources to allow the model to consider the replacement of existing wind PPAs..
Supply Side Resource Analysis (Costs)	Deficiency	20 CSR 4240-22.040 (1)	The capital cost for Combined Cycle resources should be increased.
Supply Side Resource Analysis (Evaluation of all resources)	Deficiency	20 CSR 4240-22.040 (1) and 20 CSR 4240-22.040 (4)	Accreditation for new thermal resources should be in line with the SPP proposed accreditation to ensure fair treatment amongst technology types. The forced outage rate used to adjust the unit’s accredited value should also be modeled as the forced outage rate in PLEXOS.
Supply Side Resource Analysis (Evaluation of all resources)	Concern	20 CSR 4240-22.040 (1) and 20 CSR 4240-22.040 (4)	Similar to the evaluation performed for the 2023 IRP Update, Evergy should continue to evaluate coal to natural gas conversion options in future IRP filings.
Production Cost Modeling	Concern	20 CSR 4240-22.010 (2)(B)	If Evergy is not performing production cost modeling on an 8,760 basis then they should do so for future IRP filings.
Supply Side Resource Analysis (Evaluation of all resources)	Concern	20 CSR 4240-22.040 (1) and 20 CSR 4240-22.040 (4)	In future IRP stakeholder workshops, Evergy should discuss how the retirement costs were modeled and incorporated into the Present Value of Revenue

			Requirement (“PVR”) results.
Natural Gas Price Forecast	Concern	20 CSR 4240-22.040(5) and 20 CSR 4240-22.040(5)(A)	Evergy should work with stakeholders to incorporate fuel price volatility into the development of the natural gas price forecasts.
SERVM Modeling	Concern	20 CSR 4240-22.080 (5) and 20 CSR 4240-22.080 (5)(A)	Evergy should include a discussion of the SERVM modeling process in the IRP stakeholder workshops to allow stakeholders the opportunity to ask questions and provide feedback.
Stakeholder Workshops	Concern	20 CSR 4240-22.080 (5) and 20 CSR 4240-22.080 (5)(A)	Evergy should adopt the technical stakeholder process suggested by NEE.

3. Each of these deficiencies and concerns, as well as NEE’s suggested recommendations are discussed in Energy Future Group’s Report on behalf of NEE filed with this cover pleading.

4. A “Confidential Version” and a “Public Version” of the Comments are being provided based on Evergy’s previous designations of confidential information. The confidential information in the “Confidential Version” is marked with asterisks and highlighting.

WHEREFORE, NEE respectfully requests that the Commission accept these Comments. NEE also requests all other relief to which it is entitled.

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 and associated Comments have been emailed this August 29, 2024, to all counsel of record.

/s/Andrew O. Schulte
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