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 Evergy Missouri Metro in its Next Triennial Compliance Filing or Next Annual Update Report	)))))	File No. EO-2025-0078
In the Matter of a Determination of Special Contemporary Resource Planning Issues to be Addressed by Evergy Missouri West, Inc. d/b/a Evergy Missouri West in its Next Triennial Compliance Filing or Annual Update Report	))))))	File No. EO-2025-0076

SIERRA CLUB'S LIST OF SUGGESTED SPECIAL CONTEMPORARY ISSUES

Pursuant to 20 CSR 4240-22.080(4), Sierra Club hereby recommends the following as special contemporary issues for consideration, analysis, and documentation by Evergy Missouri Metro, Inc. and Evergy Missouri West, Inc. (together "Evergy" or the "Company") in its next IRP filing:

1. Regulatory Risk Assessment and Going-Forward Value of Evergy's coal units. Evergy should analyze and document the net present value of continuing to operate each of the Company's coal-burning units, including consideration of known and potential compliance costs. This issue is especially significant for the units that are currently slated to operate until the late 2030s, such as Jeffrey 1, LaCygne 2, and Iatan 1, despite indicators that the units have been struggling mechanically, economically, or both. Additionally, Evergy's coal units face risks from proposed and final regulations, such as the Good Neighbor Plan, GHG performance standards (111(d)), Regional Haze regulation, and updated proposed Mercury Air Toxics Standards. As explained in recent

Evergy IRP comments,[1] Evergy has ignored the massive compliance costs that its generating units would require to meet EPA's greenhouse gas limits. Accordingly, Evergy should be ordered to study whether retaining each unit in operation benefits customers in comparison with an alternative suite of resources, including consideration of compliance with all of these environmental regulations.

2. Capacity Expansion Modeling. 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. Although Evergy conducted capacity expansion modeling in its most recent IRP, the Company continues to model pre-selected portfolios where unit retirements and replacement resources are fixed, limiting consideration for clean energy and earlier retirement for several coal units until 2030 at the earliest. While Evergy has agreed to perform modeling in its IRPs that allows for economic retirement and replacement of resources according to the key factors it has identified, the baked-in model assumptions for retirement dates and replacement resources undermine the exercise of capacity expansion modeling and do not produce an objective, optimized portfolio comprised of resources that have been economically justified.
3. Load Growth Scenarios. Evergy's latest investor presentation notes that "more than 6 gigawatts of incremental demand [are] actively considering [its] service territories.[2] Evergy should thus analyze and develop several scenarios for meeting iterations of potential load growth using both demand-side and supply-side solutions to minimize ratepayer impacts.

[1] Sierra Club's Comments on Evergy's 2024 Integrated Resource Plan, Docket No. EO-2024-0153 (Aug. 29, 2024), available at: https://www.efis.psc.mo.gov/Case/FilingDisplay/599671.
[2] Second Quarter 2024 Earnings Call, p. 6, August 9, 2024, available at https://investors.evergy.com/static-files/e6669212-3df3-4422-9e5a-869eb966bc55.

4. Grid-Enhancing Technologies. The nation is facing an aging grid that will require both the expansion and refurbishment of existing infrastructure. Grid-enhancing technologies (GETs) can help maximize existing infrastructure to reduce congestion in a rapid and cost-effective for ratepayers considering the alternatives. Evergy should thus study the use of GETs holistically on its system, including the use of dynamic line and transformer ratings, power flow controllers, reconductoring, topology optimization, and other technologies.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 15th day of September, 2024, to all counsel of record.

/s/ Sarah Rubenstein
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