

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-2025-0078
Eversource 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-2025-0076
Eversource 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 Eversource Metro Inc., d/b/a Eversource Missouri Metro and Eversource Missouri West, Inc., d/b/a Eversource Missouri West (together, “Eversource”) in its 2025 annual update compliance filing.

1. The Inflation Reduction Act (“IRA”) 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 Eversource’s load forecasts and other demand-side input assumptions.

2. Eversource 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.¹

3. 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.

4. Evergy should address whether it conducted production cost modeling in its 2024 Triennial IRP and whether it conducted production cost modeling in its 2025 Annual Update. If production cost modeling has not been conducted, Evergy should explain why not.

5. Evergy should discuss in detail what risks Evergy is incorporating into the natural gas price forecast and potential methodologies to more accurately anticipate the occurrence and effects of acute and prolonged periods of elevated gas prices and increased volatility of gas prices in Evergy's natural gas fuel price forecast.

6. Evergy should explore and report on the Partial and Fitted Chronology settings in PLEXOS including evaluating the potential impact the setting choice may have on the selection of battery storage resources.

7. Evergy should evaluate whether assuming transmission upgrades would have a significant impact on the market prices developed. If there is a significant impact, then Evergy should include those market prices as a sensitivity.

8. Evergy should include model runs that relax the build constraints to see if the resource planning model would take more of any constrained resource and report on

¹ 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).

the results.

9. Evergy should address forced outage rates for new CTs in PLEXOS and the forced outage rate assumed for CTs and CCs should match what SPP provides as summer and winter weighted average forced outage values.

10. Evergy should continue to evaluate the potential for coal to natural gas conversions.

11. Evergy should model performance-based accreditation for thermal resources according to SPP's latest methodology.

Respectfully submitted,

By: /s/Andrew O. Schulte

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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 16, 2024, to all counsel of record:

/s/Andrew O. Schulte _____
Andrew O. Schulte