

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

In the Matter of the Application of Evergy	)	
Metro, Inc. d/b/a Evergy Missouri Metro	)	
and Evergy Missouri West, Inc. d/b/a	)	File No. EO-2025-0154
Evergy Missouri West for Approval of	)	
Tariffs Related to Service of Large Loads	)	

**APPLICATION**

**COMES NOW**, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro” or “EMM”), and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West” or “EMW”) (collectively “Evergy”, the “Company”, or the “Applicant”), hereby file this *Application for approval of Evergy’s Large Load Power Service (“LLPS”) Rate Plan and Associated Tariffs* (“Application”) with the Missouri Public Service Commission (“Commission”) pursuant to Section 393.140(11) RSMo. and 20 CSR 4240-2.060. In support of its Application, the Company states as follows:

1. Evergy Missouri Metro is a Missouri corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. It is engaged in the generation, transmission, distribution, and sale of electricity in western Missouri and eastern Kansas, operating primarily in the Kansas City metropolitan area. Evergy Missouri Metro is an “electrical corporation” and a “public utility” subject to the jurisdiction, supervision, and control of the Commission under Chapters 386 and 393. Evergy Missouri Metro’s certificate of good standing was filed in Case No. EN-2020-0063 and is incorporated by reference pursuant to 20 CSR 4240-2.060(1)(G).

2. Evergy Missouri West is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. It is engaged in the generation,

transmission, distribution, and sale of electricity in western Missouri, including the suburban Kansas City metropolitan area, St. Joseph, Warrensburg, Sedalia, and surrounding counties. Evergy Missouri West is an “electrical corporation” and a “public utility” subject to the jurisdiction, supervision, and control of the Commission under Chapters 386 and 393. A certificate of authority for EMW to do business in Missouri as a foreign corporation was filed with the Commission in No. EN-2020-0064 and is incorporated by reference pursuant to 20 CSR 4240-2.060(1)(G).

3. EMM and EMW are wholly owned subsidiaries of Evergy, Inc. (“Evergy, Inc.”). EMW and EMM have no annual report or regulatory assessment fees that are overdue.

4. EMM and EMW have two pending actions or final unsatisfied judgments or decisions against them from any state or federal agency or court which involve customer services or rates, which action, judgment, or decision have occurred within three years of the date of this application, as detailed below:

- (i) *William Gregoric v. Evergy Missouri Metro*, File No. EC-2025-0143; and
- (ii) *Ramey Chisum v. Evergy Missouri Metro*, File No. EC-2025-0192.

5. In addition to undersigned counsel, communications in regard to this matter should be addressed to:

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6. Data requests concerning this Application should be addressed to:  
[Regulatory.Affairs@evergy.com](mailto:Regulatory.Affairs@evergy.com).

## **I. BACKGROUND**

7. By this Application, Evergy seeks an order from the Commission approving, on or before August 1, 2025 the Company's Large Load Power Service ("LLPS") Rate Plan, all accompanying new and modified tariffs, as well as any additional or conforming tariff changes that are identified through the course of this proceeding that are needed to implement the LLPS Rate Plan.

8. In support of its filing, the Company is filing the Direct Testimony of the following three witnesses:

- Mr. Kevin D. Gunn: Mr. Gunn is the Company's lead policy witness. He discusses the national trends and marketplace driving new large customer loads across the country and explains how this trend presents an historic opportunity for Missouri. Mr. Gunn provides an overview of the LLPS Rate Plan and background on how the Company developed its LLPS Rate Plan, including some of the Company's key considerations, goals, and objectives.
- Mr. Jeff Martin: Mr. Martin details the process the Company used to develop the LLPS Rate Plan, discusses the updated interconnection process – known as the "Path to Power" that the Company plans to use for new large

load customers over 25 MW. Mr. Martin also discusses resource planning and economic development rate considerations related to the LLPS Rate Plan.

- Mr. Bradley D. Lutz: Mr. Lutz sponsors all tariffs the Company seeks approval of, which together comprise the LLPS Rate Plan. Among other things, Mr. Lutz summarizes each tariff, discussing eligibility, pricing considerations, and key terms and conditions.

## **II. REQUEST FOR APPROVAL OF EVERGY'S LLPS RATE PLAN**

9. By this filing, Evergy presents for Commission approval the Company's LLPS Rate Plan. The LLPS Rate Plan is the product of a comprehensive effort Evergy has undertaken to best position itself and the State of Missouri at the forefront of an unprecedented surge in new large load customer growth. The LLPS Rate Plan will establish a nation-leading program to attract and retain large customers in a manner that is equitable, efficient, and transparent, while positioning Evergy and Missouri to support the State's important economic development policies and priorities. The LLPS Rate Plan builds on the Company's existing rate structures for commercial and industrial customers and incorporates a variety of modifications and optional programs designed to accommodate the unique needs and desires of large load customers, while enshrining numerous provisions that will protect non-participants from undue risk. Central to the LLPS Rate Plan is a new, tariffed rate offering, Schedule LLPS, which sets forth the tariffed terms and conditions that will apply to customers over 100 MW seeking to interconnect to Evergy's Missouri system. In addition to Schedule LLPS, the LLPS Rate Plan includes a selection of new and existing tariffed offerings, which are largely designed to expand the Company's clean and renewable

energy offerings that will be available to Schedule LLPS customers, while ensuring that customers who elect to participate pay their fair share.

10. As part of this filing, the Company requests approval of the following new and modified tariffs included in this filing:

- New Tariffs - Base Tariffs to the LLPS Rate Plan
  - Schedule LLPS (Large Load Power Service)
- New Tariffs – Complementary Riders to the LLPS Rate Plan
  - Schedule SR (System Support Rider)
  - Schedule CCR (Customer Capacity Rider)
  - Schedule DRLR (Demand Response & Local Generation Rider)
- New Tariffs – Renewable/Carbon Free Attribute Procurement Riders Within the LLPS Rate Plan
  - Schedule CER (Clean Energy Choice Rider)
  - Schedule RENEW (Renewable Energy Program Rider)
  - Schedule AEC (Alternative Energy Credit Rider)
  - Schedule GSR (Green Solution Connections Rider)<sup>1</sup>
- Modified Tariffs to accommodate LLPS Rate Plan
  - Schedule LPS (Large Power Service)
  - Schedule SIL (Special Rate for Incremental Load Service)<sup>2</sup>
  - Rules and Regulations Section 2 and Section 8

To develop the applicable rates included in Schedule LLPS, Evergy developed a Large Load Class Cost of Service (“CCOS”) Study. Evergy is providing the Large Load CCOS Study in summary form as an attachment to the Direct Testimony of Mr. Bradley D. Lutz. Company witness Mr. Jeff Martin also outlines the Company’s “Path to Power” process, which reflects an updated interconnection study process designed to transparently and fairly evaluate new large load, while

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<sup>1</sup> The Green Solutions Rider is currently before the Commission in Case No. EA-2024-0292, *In re Application of Evergy Missouri West for Permission and Approval of Certificates of Public Convenience and Necessity Authorizing It to Construct, Install, Own, Operate, Manage, Maintain and Control Two Solar Generation Facilities* (filed Oct. 25, 2024). The Company is proposing the same rider for EMM in this filing.

<sup>2</sup> For EMW only.

ensuring costs associated with bringing new load on the system are appropriately allocated to new large load customers.

11. Evergy proposes various changes to its General Rules & Regulations to memorialize its Path to Power process. Evergy's proposed LLPS Rate Plan encompasses numerous protections for existing and non-participating customers. Protections include the proposed System Support Rider (under which participating customers will contribute to the future reliability and affordability of Evergy's power grid), a minimum bill requirement, updates to the Company's line extension policies to ensure new large customers pay for the costs of dedicated facilities needed to serve them, a 15-year term, as well as a variety of financial due diligence requirements and financial metrics large customers must comply with to demonstrate their ability to pay for all costs imputed to them.

12. In the interests of transparency and to help the Commission track the success of the LLPS Rate Plan, Evergy proposes to file an annual compliance report filing with the Commission, as discussed in Mr. Gunn's testimony. The annual report will inform the Commission on the number of new or expanded customers that have enrolled in Schedule LLPS, the total estimated load enrolled under each rate, the sector the customer is in, and the estimated number of new or retained jobs associated with each new customer.

### **III. REQUESTED ORDER DATE**

13. Evergy respectfully requests that the Commission issue an order by August 1, 2025. As explained in Mr. Gunn's testimony, Evergy requests expedited treatment: (1) to provide clarity and certainty to new customers that are actively considering locating in Evergy's jurisdiction; (2) to provide clarity and certainty to existing customers and other stakeholders regarding rate treatment; A proposed procedural schedule reflecting Evergy's request is below.

#### IV. PROCEDURAL SCHEDULE

13. Applicant proposes the following procedural schedule:

Application and Testimony	February 14, 2025
Staff Recommendation/Rebuttal and Intervenor Rebuttal	April 14, 2025
Surrebuttal	May 14, 2025
List of Issues and Witnesses, Order of Openings, Witness Testimony and Cross Examination	May 21, 2025
Last Day to Request Discovery	May 21, 2025
Position Statements	June 2, 2025
Settlement Conference	June 5-6, 2025
Evidentiary Hearing	June 9-11, 2025
Briefing	July 1, 2025
Requested Order Date	August 1, 2025

14. Applicant filed a 60-day Notice of Filing pursuant to 20 CSR 4240-4.020(2) on November 13, 2024.

15. **WHEREFORE**, Evergy respectfully requests that the Commission approve its proposed LLPS Rate Plan, the accompanying new and modified tariffs, its request for a Commission order on the Application by August 1, 2025, and associated procedural schedule, any additional or conforming tariff changes that are identified through the course of this proceeding that are needed to implement the LLPS Rate Plan, as well as any additional findings necessary to grant Evergy's requested relief.

Respectfully submitted,

/s/ Roger W. Steiner

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**Attorneys for Evergy Missouri Metro  
Evergy Missouri West**



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was served upon counsel for all parties on this 14<sup>th</sup> day of February 2025 by either e-mail or U.S. Mail, postage prepaid.

*/s/ Roger W. Steiner*

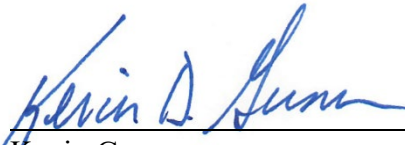
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Roger W. Steiner

**VERIFICATION**

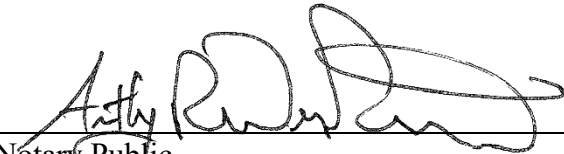
STATE OF MISSOURI     )  
                                      ) ss  
COUNTY OF JACKSON    )

I, Kevin Gunn, state that I am Vice President, State and Federal Regulatory Policy for Evergy, Inc., that I have reviewed the foregoing Application, that I am familiar with its contents, and that the statements contained therein are true and correct to the best of my knowledge and belief.

Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Kevin Gunn

Subscribed and sworn before me this 14<sup>th</sup> day of February 2025.

  
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Notary Public

My commission expires: 4/26/2025

