

**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 Metro in its	)	<b>File No. EO-2022-0055</b>
Next Triennial Compliance Filing or Next Annual	)	
Update Report.	)	

**INITIAL COMMENTS OF AARP MISSOURI**

AARP Missouri intervened in the most recent integrated resource planning (“IRP”) case of Evergy Missouri Inc. (“Evergy”), Case No. EO-2021-0035, in order to review and comment on the utility’s Sustainability Transformation Plan (“STP”) proposal that is part of its IRP. On August 26, 2021, the Commission made all parties to EO-2021-0035 also party to this new case, and offered those parties an opportunity to comment on any “special contemporary issues” that Evergy should address in its next IRP filing.

AARP Missouri remains deeply concerned about the aggressive spending contained in Evergy’s STP proposal. AARP supports sustainable energy policies and initiatives that promote and that protect the electric grid in order to ensure safe and adequate service. But AARP is also concerned about preserving the affordability of essential services for essential services, especially older electric customers. We worry about proposals that could result in over-investment and would add excessive spending to the cost of providing essential electric service.

Consequently, AARP is very concerned that the Evergy STP would lead to increased electricity rates and bills through massive new spending. The STP’s greatly increased spending was proposed shortly after the involvement of Elliott Management

into Evergy's business plans. *Excessive* grid spending is not needed to keep the lights on, and so every aspect of Evergy's current and future IRPs, and the STP in particular, should be closely scrutinized for cost-effectiveness.

The Commission should be mindful that many Missourians struggle to pay their bills, and do not have extra funds to pay any higher electric bills. Many AARP members must live on low or fixed incomes, and are often faced with tough choices between paying for food, medicine and other monthly necessities. Indeed, a recent AARP survey found that an increase in utility bills would be a major problem for 30% of Missouri residents 50 and over.

Because of these realities, AARP urges the Commission to insist that Evergy rethink the level of its planned STP spending, massively increased spending on the power grid, for new high voltage transmission lines, for electric car subsidies, for subsidies to promote electric heat over cheaper energy sources, for the early replacement of meters, etc. The STP's various extra initiatives would unnecessarily raise the monthly household expenses of its captive residential customers in Missouri.

The Evergy presentations presented to the public in Missouri thus far have been lacking in detail, and AARP has not yet seen any comprehensive studies on the cost effectiveness of Evergy's wish list. AARP is unconvinced that Evergy's massive, multi-billion-dollar STP plan, as presented, is prudent or reasonable. At the least, the proposals contained in the STP presentations should be narrowed down to only what is reasonably necessary to ensure affordable, reliable service and meet pre-approved sustainability goals.

Furthermore, extra spending should be tracked and analyzed before the fact to ensure that the improvements made are economic and provide benefits that outweigh and justify the high cost. STP programs should be limited to those that are necessary for reliability, and with new categories deployed on a small pilot basis, and then evaluated to ensure such programs are truly cost effective.

/s/ John B. Coffman

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 14<sup>th</sup> day of September 2021.

/s/ John B. Coffman

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