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Sponsoring Party: Public Counsel
Case No.: EA-2025-0075

REBUTTAL TESTIMONY

OF

JORDAN SEAVER

Submitted on Behalf of the Office of the Public Counsel

EVERGY MISSOURI WEST, INC. D/B/A EVERGY MISSOURI WEST

CASE NO. EA-2025-0075

** _____ **
Denotes Confidential Information that has been redacted.

April 25, 2025

PUBLIC

REBUTTAL TESTIMONY
OF
JORDAN SEAVER

Evergy Missouri West d/b/a Evergy

CASE No. EA-2025-0075

I. INTRODUCTION

Q. What is your name and what is your business address?

A. My name is Jordan Seaver, and my business address is 200 Madison Street, Governor Office Building, Suite 650, Jefferson City, MO 65102.

Q. By whom are you employed and in what capacity?

A. I am employed by the Office of Public Counsel ("OPC") as a Policy Analyst.

Q. Have you previously testified before the Missouri Public Service Commission ("The Commission")?

A. Yes, I have previously testified before the Missouri Public Service Commission. See Schedule JS-S-1 for my past pre-filed testimony and memoranda.

Q. What are your work and educational backgrounds?

A. I have been employed as a Policy Analyst by OPC since January 2022. I have attended Michigan State University's Institute of Public Utilities ("IPU") Accounting and Ratemaking Course, as well as the National Association of Regulatory Utility Commissioners ("NARUC") Rate School. I previously worked as a Legal Assistant for Cascino Vaughan Law Offices for 7 years. I have a Master of Arts in Philosophy from the University of Wyoming, and a Bachelor of Arts in Philosophy from the University of Illinois at Chicago.

Q. What is the purpose of your Rebuttal testimony?

A. The purpose of this testimony is to state that the OPC supports the Commission granting this Certificate of Convenience and Necessity ("CCN") and to also raise issues caused by the lead up to and planning for this CCN that will result in consequences for recovery of costs in a future rate case for Evergy Missouri West ("EMW" and "the Company"). In addition, it is the

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purpose of my testimony to include in the record comments from the public on this CCN application.

Q. What specific issues arise from this CCN?

A. In order to answer this question and set out plainly the point of my testimony, I provide the below argument:

1. For years EMW has needed capacity and energy.
2. Providing sufficient, reliable, and affordable capacity and energy for EMW is necessary for serving EMW customers.
3. The Company, despite repeated warnings and calls to action, relied on PPAs for capacity for its customers.
4. PPAs were not sufficient, reliable, and affordable capacity, nor were they providing energy.
5. Following from 2 and 4, the Company has been avoiding doing what is necessary for serving EMW's customers and needlessly exposing customers to volatile market swings.
6. Following from 5 and 1, the Company has been imprudent in waiting until now to propose very expensive gas investments—especially after the purchase of a portion of the Dogwood plant—which seems superfluous given the level of investment that the Company has finally committed to.
7. Because the prior warnings were not taken seriously, the Company has forced customers to spend more money than they would have on generation that was in fact needed previously.
8. Therefore, this managerial inaction constitutes imprudence on behalf of the Company, and it has all but acknowledged this by calling the purchasing of a portion of Dogwood and the building of large gas

turbines necessary according to the most recent Integrated Resource Plan ("IRP")[1].

In what follows, I will expound upon the premises of this argument in order to bolster its conclusion.

Q. Are you proposing that the Commission deny this CCN?

A. No, I am not. My argument and the issues presented here are simply to create a record for consideration of cost recovery in a future rate case.

Q. Are you in any way claiming that the Company's request for the Commission to grant this CCN is imprudent?

A. I'm not claiming that the Company is imprudent to seek permission to build thermal generation, nor am I claiming that there is anything imprudent about this CCN *per se*. What I am claiming is that the Company has been imprudent for many years and that the timing of this CCN along with certain planning decisions is imprudent. The OPC rejects the decisional prudence request from the Company. The Company's managerial inaction has already led to excessive fuel adjustment clause ("FAC") related costs, and yet again the consequences of this inaction are being forced onto captive ratepayers who are being called on to support an investment that is over ** _____ ** more than it would have been had the Company acted sooner on their clear generation shortfall. See pages 17-18 for the discussion of this cost difference. In addition, due to the Company's strategy of buying energy off the market, EMW customers have had losses related to fuel costs and purchased power costs since 2019 of ** _____ **.

[1] Case No. EO-2024-0154, *In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's 2024 Triennial Compliance Filing Pursuant to 20 CSR 4240-22.*[2] See Geoff Marke, Surrebuttal Testimony CONF, EO-2023-0277, pp. 4-5.
[2] See Geoff Marke, Surrebuttal Testimony CONF, EO-2023-0277, pp. 4-5.

Q. According to the Company, why is it seeking this natural gas CCN?

A. Company witness Cody VandeVelde states in his direct testimony that "the 2024 Triennial IRP" shows that "EMW has a need for future physical capacity, physical energy, and a hedge against the Southwest Power Pool ("SPP") energy market, which is expected to be met with a variety of supply-side and demand-side resources."[3] He states further on that "EMW has a need for both traditional dispatchable generation, as well as emission-free resources as environmental regulations affect fossil fuel generation."[4] And further on he states that "All of these initiatives will help to enable EMW to meet its customers' future capacity and energy needs. Delaying the development of Viola and Mullin Creek #1 would be detrimental to the needed build-out of generation and would put significant risk on EMW's ability to meet future capacity and energy requirements of its customers"[5]. Later in his testimony, VandeVelde states that "these projects are vital to meeting EMW's capacity and energy requirements as identified in the 2024 IRP Preferred Plan. EMW's proposed 50% share of the 710 MW Viola [combined cycle gas turbine ("CCGT")] plant specifically corresponds to the 325 MW of thermal resources that is identified in the year 2029 in the Preferred Plan."[6] This shows that the Company's 2024 IRP indicated a need for capacity and generation at a specific year in the future, and so the CCN is in response to the need that was brought to the attention of the Company in the IRP process.

[3] Cody VandeVelde, Direct Testimony, EA-2025-0075, p. 3.
[4] *Ibid.*
[5] *Ibid.*
[6] *Ibid.*, p. 6.

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Q. Does the Company provide results from its IRP modeling that support the generating plants requested in this CCN application?

A. Yes, the Company provides evidence from the most recent triennial IRP (2024)[7] to justify the construction and acquisition of three generation plants. The plants in question are two combined cycle gas turbines, and one simple cycle combustion turbine. I will refer to all of these variously as combustion turbines ("CTs"), gas turbines ("GTs"), generators, generation plants, and plants. When I refer to, without any elaboration, the plants collectively as CTs, I am referring to both the combined cycle and the simple cycle turbines. Mr. VandeVelde shows that EMW's near-term capacity position is negative as soon as this year (2025) by 81 MW, and, without the addition of these plants, dips to a deficit of 557 MW by 2030[8]. Considering the time it takes to build any kind of generation, it will be necessary now to begin the process of putting online generation capable of eliminating the deficit and, one would hope, provide a buffer of capacity for EMW.

Q. Assuming this CCN is granted by the Commission, when would the plants be brought online to provide capacity and energy for EMW?

A. As Mr. VandeVelde says in his direct testimony, "When they are fully operational, the Viola combined-cycle plant and the Mullin Creek #1 simple-cycle plant will help meet EMW's near-term requirement for capacity starting in 2029-2030."[9] In his supplemental direct testimony, Mr. VandeVelde states that half of both the capacity and energy from the McNew plant will be assigned to EMW as well. The McNew plant will also come online in 2030.

[7] Case No. EO-2024-0154, *In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's 2024 Triennial Compliance Filing Pursuant to 20 CSR 4240-22.*
[8] Cody VandeVelde, Direct Testimony, EA-2025-0075, p. 7.
[9] *Ibid.*

Q. How many more MW of nameplate capacity will be added to EMW's generation portfolio by 2030 if this CCN is granted by the Commission?

A. EMW will have an increased installed capacity of 1,130 MW[10]. This comes from 352.5 MW from the Viola plant, 352.5 MW from the McNew plant, and 425 MW from the Mullin Creek plant.

Q. What is the Company's updated capital cost estimate for these plants that will be assigned to EMW?

A. The updated capital costs from Company witness Kyle Olson are as follows:

	Total Plant Capital Cost	**EMW Plant Capital Cost**
Viola	** _____ **	** _____ **
McNew	** _____ **	** _____ **
Mullin Creek	** _____ **	** _**
Total	** _____ **	** _____ **

The values in the EMW Plant Capital Cost column assume that the total capital costs of the McNew and Viola plants will be divided in half.

Q. Do you believe that these will be the final costs of these plants?

A. I cannot say what the final costs will be, but there are many uncertainties at play in the domestic and global markets that will affect the eventual and final cost of these plants. There is historic and ongoing high inflation of the US dollar, and this

[10] Due to SPP accreditation rules and methods, the accredited capacity of the portion of these plants for EMW will be less than the installed capacity (the latter of which is synonymous with nameplate capacity).

inflation also affects other currencies. Considering these circumstances, I suspect that the eventual and final costs will be higher than the current cost estimates.

Q. Did the Company file testimony in this case that addressed the anticipated bill impact of these investments on EMW's retail customers?

A. No, the Company did not file testimony specifying any bill impact analysis or figures. From the table above, it is clear that there will be significant and obvious bill impact to customers as a result of this investment if the total costs are applied to a rate increase. This is a problem because EMW ratepayers have been experiencing large bill increases for years now and this increase along with other future investment will simply become more of a strain.

Q. Does the OPC oppose the Commission granting this CCN?

A. No, the OPC does not oppose the Commission granting this CCN. The OPC has been in vocal, public support of EMW acquiring new generation. Our office has also been in vocal, public support of EMW acquiring firm, reliable, dispatchable generation. Each of these plants is more than sufficient to meet these requirements, and thus we are not opposed to it in principle. However, there are issues with the timing of this CCN, with the choice of the class of combustion turbines, and with the planning of this set of three combustion turbines being done with respect to Evergy as a whole company, across all its utilities.

Q. What issues does the OPC see with the way that the Company has come to its decision to ask for this CCN?

A. The OPC has issues with the timing of this CCN application and with the past resistance of the Company to acquire any plant such as these. Our office is pleased with the decision to acquire firm, dispatchable, and reliable

generation, but it has come at a time when the cost to customers will be higher than it would have been. These Mitsubishi J-Class combustion turbines (both CCs and CTs) have been available for years—the first J-Class Mitsubishi turbine to be built in North America was expected to have commercial operation in 2017—and the Company has been aware of this[11]. At the same time that the Company was aware of the possibility of acquiring a J-Class combustion turbine, the OPC was filing testimony that was asking the Company to acquire generation that was firm, dispatchable, and reliable. Gas combustion turbines meet these three criteria. The Company instead chose to rely on the market for capacity. Therefore, the OPC supports this CCN, but we would also like to make it known that, due to EMW's delay in adding dispatchable generation resources, the OPC will likely bring up prudence issues for the recovery of costs in future rate cases. The OPC also reserves the right to make cost disallowance recommendations based on inaccurate cost estimates and any imprudent costs realized in the construction of these plants.

Q. What is the OPC's position on the applicants' request that the Commission find the decision to pursue the plants in this CCN prudent?

A. Instead of addressing the prudency of the applicant's decision now, the OPC requests that the Commission reserve for a later rate case the ruling on the prudence of the Company. As stated above, we do not oppose the Commission granting permission for this CCN but we do oppose any automatic treatment of prudence for the cost recovery of these plants.

[11] Data Request response 2511, attached as schedule JS-R-2.

Q. Why is it important, in your opinion, that the Commission reject decisional prudence?

A. What is important is that the Company not be rewarded for managerial inaction and for having an inordinate amount of focus on shareholders at the expense of ratepayers. I recommend that the Commission consider this CCN to be necessary in order to provide capacity and energy to EMW customers, but that the Company forced itself into this position. The costs of these plants are very high, relative to what the Company could have built in the past or what could have been built instead (see below regarding Ameren's recent plant acquisition). These high costs benefit shareholders, but they do not benefit ratepayers, except insofar as rolling blackouts, or worse, are avoided. But, capacity and energy could have been provided in a prudent way prior to the decision to look at siting and building these plants. In conclusion, this CCN is necessary, but the decisions that led to its being necessary were not prudent and the fact that it is necessary now is not ideal.

Q. Which experts at the OPC were telling the Company to build dispatchable and reliable generation to make up the for the capacity deficit of EMW?

A. The experts I am referring to are Lena Mantle P.E., Dr. Geoff Marke, and John Robinett. All of them have discussed this issue many, many times with the Company over the years not just in testimony, but also in many different meeting settings and conversations regarding planning of various kinds, including IRP and FAC meetings.

Illustrative of Ms. Mantle's many comments and warnings over the years are some points she makes in her rebuttal testimony in the 2022 Evergy rate case[12]. She discusses the problem with Evergy's planning for Evergy as a

[12] Lena Mantle, Rebuttal Testimony, ER-2022-0129 and ER-2022-0130.

whole at the SPP capacity level, but being two separate utilities. The problem with this is that EMW is short on energy and the only reason there is a surplus reflected in the 2022 IRP is that they have wind PPAs and wind facilities, which are not going to provide that energy at peak demand times. Further the planning for PPAs and owned generation is done at the SPP capacity level for Evergy Missouri West as well as Evergy Missouri Metro. This can lead to projects that are more expensive than they need to be for EMW customers because they are based on fitting the needs of the whole Company and not just the individual utility (i.e., EMW).

Her comments here point to an underlying issue that is reflected in the retirement of the Sibley plant[13]. The Company chose to retire Sibley extremely early and chose not to invest as soon as possible in sufficient combined cycle or J-Class simple cycle combustion turbines[14]. Had they done this, the Company would have taken advantage of lower costs when the future need for capacity and energy was immediately apparent.

Ms. Mantle goes on to say that "Evergy West incurred more than $315 million in fuel and purchased power expenses during February 2021 to meet the electricity requirements of its customers."[15] This shows that the capacity PPAs that replaced the capacity of Sibley were costly for customers, and the retirement of Sibley before pursuing adequate energy resources was irresponsible, as it was an existing resource that was nowhere near retirement.

[13] Nothing here implies that Ms. Mantle proposed any particular type or class of generation resource in the testimony I've cited here. Ms. Mantle did not suggest, recommend, or propose any particular type or class of generation resource in said testimony. I am suggesting that the class of turbines chosen by the Company for this CCN, had they been chosen at an earlier date and in response to Ms. Mantle's comments would have resolved the issues that she pointed out at that time.
[14] The reason I specify J-Class simple cycle CTs here is twofold: first, the Company is pursuing this technology now, but it was available at the time of Sibley's retirement; and second, J-Class simple cycle CTs are made to be run more like combined cycle plants, thus can function as a baseload generator.
[15] *Ibid.*, p. 17.

Further she states in her testimony that, in FAC rate change cases ER-2022-0174 and ER-2023-0011, EMW had FAC costs for the 12 months ending May 2022 that "were $96.4 million higher than what was determined to be normal in the last rate case."[16] Ms. Mantle discusses these FAC costs and Staff witness Brad Fortson's recommendation that "ratepayers should not be burdened with the bulk of the costs from the losses of future PPAs."[17] These PPAs were chosen by the Company as a solution to the capacity shortfall even though they were expensive to customers and delayed the planning for and acquisition by many years of sufficient baseload and peaking generators.

Dr. Marke highlights and stresses similar points about PPAs in his testimony for the Sibley retirement complaint case, while advancing another facet of the problem. He states that "Sibley represents GMO's largest, dispatchable baseload coal plant and was replaced with "take-or-pay" purchased power contracts where energy is required to be sold to the SPP market whether it is cost-effective to do so or not."[18] What makes this worse is that "GMO retired this large base-load supply-side capacity even though GMO is the only Missouri electric IOU: to experience load growth; expected to get new 'economic' base load growth" and is "short on capacity."[19] Dr. Marke points out an issue that is present today as well, viz., the fact that the IRP has just recently shown an urgent need to install firm, dispatchable, reliable thermal generation despite the fact that the load growth for EMW has been happening for years, has been increasing steadily, and should be well-known to the Company. He states that "IRP modeling *only* considered Sibley as a retirement option and did not consider the possible continued operation of Sibley. GMO's modeling allowed for the continued operation of the Crossroads Energy Center

[16] *Ibid.*
[17] Brad Fortson, Direct Testimony, ER-2022-0129 and ER-2022-0130, p. 2.
[18] Geoff Marke, Surrebuttal Testimony, EC-2019-0200, p. 12.
[19] *Ibid.*

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even though Sibley was more profitable and more efficient."[20] Similarly, EMW has not until very recently considered it an option to acquire large thermal generation to meet the ever-increasing capacity shortfall that has been a known and visible problem for years. And finally, Dr. Marke states that "The 2017 IRP that selected the Sibley 3 retirement is based on a modeling assumption that KCPL and GMO resources are one, not two utilities."[21] Now in the most recent Evergy IRP, it is clear that the planning process is carried out for the utilities in Evergy's Kansas footprint as well.

In Dr. Marke's surrebuttal testimony for the eleventh EMW FAC prudence review case, Case No. EO-2023-0277, he shows that the costs to EMW customers from 2019 to 2023 because of fuel costs related to Storm Uri and purchased power costs was **_____ **. These costs are a result of the decisions by the Company to ignore the warnings and calls by OPC witnesses to build firm, dispatchable, reliable generation rather than rely on the market for capacity and energy.

The OPC as a whole filed comments in the Company's 2018 Triennial IRP filing in which it made the following point:

> "GMO's 2018 triennial report continues material changes from its last annual update, in particular the announced plan to accelerate retirement, between GMO and Kansas City Power & Light Company, of nearly 900 MW of base-load generation capacity. As described in the attached *Memorandum*, OPC is concerned the premature retirements, especially of the Sibley 3 generating unit, creates significant risk by not fully accounting for the highly uncertain, interdependent energy market and

[20] *Ibid.*
[21] *Ibid.*, p. 13.
[22] Geoff Marke, Surrebuttal Testimony CONF, EO-2023-0277, pp. 4-5.

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> policy arena in which the utility now operates. More specifically, the premature closure of base load-serving generation in favor of unknown capacity contracts through the SPP energy market raises prudency concerns moving forward by potentially producing significant stranded costs, increased risk exposure from market volatility and future reliability concerns. ***With this preferred plan, GMO would increasingly rely on the capacity and energy of other utilities…OPC has raised these concerns in GMO's currently contested rate case…and believes that venue is the proper forum for further dialogue at this point*** [emphasis added]."[23]

The last line of this highlights that the lack of capacity and the resistance on behalf of the Company to properly address it, has been an ongoing issue that the OPC has called out many times. There is no reason to believe that the Company was unaware of these warnings and admonitions, and thus it is not convincing that the Company was forced into this position by the purportedly unexpected increase in load due to new data centers.

Q. Have EMW's generating portfolio choices actually affected its customers in any material way?

A. Yes. Winter storm Uri occurred in February of 2021 and caused a very large spike in demand. Evergy Missouri Metro was long on generation that was able to provide energy and so was able to provide revenue from this energy to offset the spike in energy market changes, therefore not charging customers the exorbitant amounts per kWh that were charged by the market. EMW, on the other hand, was short and had to

[23] Office of the Public Counsel, Comments of the Office of the Public Counsel, EO-2018-0269, pp. 1-2.

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securitize[24] the losses caused by huge per kWh amounts without revenues from the sale of energy into the market. The current EMW Storm Uri securitization (SUTC) rates at primary and secondary voltages are $0.00519 and $0.00532 per kWh, respectively[25]. It was this securitization docket in which OPC expert John Robinett filed testimony[26] showing the history of the OPC's warnings to the Company about its lack of capacity and generation. He states in his rebuttal testimony in that case that OPC witnesses have urged EMW to increase capacity and firm, dispatchable, reliable generation for many years in many cases.

I have attached the testimony that Mr. Robinett included in that case as schedules to this testimony. Mr. Robinett's testimony in the securitization case is similar to my testimony here, and more years have gone by since. While it should have been done so before, after the storm Uri price increases and rolling blackouts, the Company should have done something to immediately build firm generation, especially given that EMW had been warned for years that its lack of capacity and generation was going to be a problem. Had EMW built the plants it is now requesting after the testimony filed by Mr. Robinett in that securitization case, the plants would be online now and would have come at a significantly lower cost to customers.

[24] EF-2022-0155.
[25] See Evergy Missouri West tariff sheets 168-168.5.
https://www.efis.psc.mo.gov/Document/Display/359347.
[26] John Robinett, Rebuttal Testimony, EF-2022-0155, pp. 1-3.

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Q. Besides the OPC's warnings and critiques, were there any similar warnings or critiques prior to these?

A. Yes. The Commission's Staff had been warning for decades about the lack of capacity for Aquila, then GMO, which finally became EMW. GMO added the South Harper and Crossroads facilities after warnings by Staff reaching back into the 1990's about Aquila's lack of sufficient owned generating resources. These additions, however, did not eliminate the capacity and generation problems facing the utility, as EMW continued to rely on PPAs too heavily while gambling on the deregulation of Missouri's IOUs. They therefore kept separate their generation operations from their distribution operations, relying on PPAs for capacity. Because the location of the Crossroads plant is in Mississippi, not Missouri or the EMW region more generally, there have been issues with fuel costs and transportation obstacles. These decisions were being made at a time when the Staff was telling the Company that it needed to take seriously its capacity shortfall and lack of owned generation, showing a pattern of mismanagement that has continued to the present day.

Q. Did the Company have the ability to enter into negotiations and establish a plan for acquiring large natural gas-fired baseload or intermediate load generating units prior to 2024?

A. Yes, they did. According to the Company, they were aware that the J-Class turbines from Mitsubishi have been in operation before they decided to go ahead with the CCN application. This, of course, on its own just means that the Company was looking at generation options, not necessarily that they were

delaying pursuing a specific generation option. But, J-Class turbines have been in operation since 2016, if not before[27].

Q. Are there classes of combined cycle or simple cycle turbines other than J-Class turbines that the Company would have been aware of at the time you're talking about?

A. Yes, there were H-Class turbines available at the time I'm discussing as well.

Q. Would the H-Class turbines have been cheaper to purchase and build earlier than now?

A. Yes, because any turbine would have been cheaper, and because the H-Class turbines also have larger capacity, thus taking advantage of bigger economies of scale.

Q. How do you know that an H-Class turbine purchased and built earlier would have been less costly than the combustion turbines in this current CCN application?

A. The U.S. Energy Information Administration ("EIA") publishes a statistics and analysis study for the cost of new generation conducted by Sargent & Lundy that shows cost estimates for various kinds of new generation[28]. The cost assumptions include costs associated with owner's services, land acquisition,

[27] The first J-Class turbine to be in use in the United States was in Oklahoma in 2016, and was built in manufactured in Mitsubishi's Savannah Machinery Works in Savannah, Georgia. Before this turbine was put online in Oklahoma, there were already 18 J-Class turbines in operation around the world, but not in North America. Tim Miser, "Oklahoma Receives 1st M501J Gas Turbine in Western Hemisphere", February 25, 2016, Power Engineering, https://www.power-eng.com/environmental-emissions/oklahoma-receives-1st-m501j-gas-turbine-in-western-hemisphere/#:~:text=The%20turbine%20is%20the%20first,Savannah%20Machinery%20Works%20in%20Georgia.

[28] Here I have used the EIA's 2020 and 2024 reports, both titled "Capital Cost and Performance Characteristic Estimates for Utility Scale Electric Power Generating Technologies". The 2020 report was published in February of that year and uses 2019 dollars, so it avoids any price increases or other issues relating to the events of 2020 and the following years. https://www.eia.gov/analysis/studies/powerplants/capitalcost/pdf/capital_cost_aeo2020.pdf. https://www.eia.gov/analysis/studies/powerplants/capitalcost/pdf/capital_cost_AEO2025.pdf.

electrical interconnection, gas interconnection, owner's contingency, civil work, architectural work, structural work, permitting timelines, development timelines, engineering timelines, and more. I believe that the cost assumptions included are comprehensive and those used by the Company in its own project planning. One that is not included is allowance for funds used during construction ("AFUDC") costs. I have included this as a generous 20% increase of the total cost provided by the reports. So, for an H-Class combined cycle combustion turbine with 1,100 MW net capacity, the cost in 2019 dollars would be $1,347,000,000[29]. An H-Class combined cycle combustion turbine with a net capacity of 1,227 MW would cost $1,337,000,000[30]. I have applied to both of these costs the location variation increase for Kansas City listed in an appendix to the report. This variation increase was 8.14% for the 2020 report and 4.6% for the 2024 report. So, the cost for a comparable H-Class combined cycle combustion turbine from the 2024 report (in 2023 dollars) is **_____ ** less than the total capital cost for all of the combustion turbine projects for EMW in this CCN. It also has 97 MW more net capacity than that provided to EMW by the combustion turbines in this CCN. The H-Class combined cycle combustion turbine from the 2020 report is **_____ ** less than the total capital cost to EMW for the plants in this CCN, and is 30 MW less than the capacity provided to EMW by the plants in this CCN. Below I have provided this information in a table so it may be more easily referred to and seen.

[29] Rounded up from the exact cost estimate of $1,346,912,681.
[30] Rounded up from the exact cost estimate of $1,336,220,649.

	Capacity (MW)	**Capacity Difference from Current Plants**	**Capital Cost**	**Capital Cost Difference from Current Plants**
2019 CC Plant	1,100	177.5	$1,347,000,000	**_____ **
2023 CC Plant	1,227	304.5	$1,337,000,000	**_____ **
Current Plants	1,130	0	**_____ **	$0

The bottom line is that the Company could have saved customers about **_____ ** on capital costs alone had they heeded warnings from the OPC and Staff and decided to build firm, dispatchable, reliable generation in between 2018 and 2021. The Company could have also provided capacity and energy to EMW with no need to build any thermal plants for the service territory at this time. If you look at the table, you'll also notice that the difference in capacity between each potential CC plant and the CCN application plants (assigned to EMW) is positive. So, in those scenarios where the Company did this it would have resulted in more capacity at a lower cost. The other plants that Evergy Missouri West has an application before the Commission for are solar plants, with a total of 165 MW capacity[31].

Q. But would these capital cost estimates apply to J-Class turbines built in these same time periods?

A. These capital cost estimates are for H-Class combustion turbines, and so they can only really apply to that class. The J-Class turbines are different in

[31] EA-2024-0292. See Cody VandeVelde, Direct Testimony, p. 5 for this information and more about these two solar plants.

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operation, especially for simple cycle plants. But, the point still stands: the Company could have installed all the capacity they are looking for with one H-Class combined cycle turbine and it would cost less than the plant requested in this application. The difference in class doesn't detract from the problem that the shortfall in capacity and energy would have been better made up with something like I have discussed above. Because of continuing cost increases, from 2020 onward, for generation and materials that are required for generation, it should be clear that any J-Class turbines built at the times that the experts for the OPC had been urging the Company to build firm, dispatchable, reliable generation to resolve EMW's lack of capacity, would have been cheaper than those in this CCN application.

Q. Doesn't the difference in function warrant the acquisition of J-Class turbines, even if the timing of the plant additions is not ideal?

A. Given the timing of the additions, I believe that a more ordinary combustion turbine generator with significantly lower capital cost could have been planned for. I say "given the timing" because it is a fact that the Company delayed this generation buildout to the detriment of its customers, and against the better advice of experts involved in regulating its activities in the interests of the Company's customers. Ameren Missouri's Castle Bluff project is expected to cost "approximately $900 million,"[32] will be "placed in service by the end of October 2027,"[33] and will have a 700 MW net summer capacity and an 800 MW net winter capacity.[34] The Castle Bluff project is an example of a Missouri investor-owned utility acquiring firm, dispatchable, reliable generation at a price point well below what is being proposed by EMW in this case, and in the same time period as the planning period for the projects in this case. The

[32] Mitchell Lansford, Direct Testimony, EA-2024-0237, p. 3.
[33] *Ibid.*, p. 2.
[34] Steven Wills, Direct Testimony, EA-2024-0237, p. 3. The Castle Bluff plant is made up of 4 combustion turbines, each with a summer capacity of 175 MW and a winter capacity of 200 MW.

Castle Bluff plant also provides close to the same capacity as EMW's share of the Viola, McNew, and Mullin Creek plants, with more than enough to cover the highest capacity shortfall of 557 MW in 2030 (see above, p. 5). Below I have provided a cost comparison table to compare and contrast the plants in this CCN with the plants[35] purchased by Ameren for the Castle Bluff project.

Castle Bluff Plant	Evergy CCN Plants
800 MW	1,130 MW
$900 million	** _____ **
$1,125,000 per MW	**_____ **

Q. Is it fair to say, though, that you are using the benefit of hindsight to say that the Company made a bad decision in the past and has therefore made a bad decision now?

A. No, that is not a fair assessment of my argument. Taking the benefit of hindsight and then making an unfair judgment based on said hindsight occurs when there is knowledge acquired that would change the conclusion leading to a decision. Here I'm using "conclusion" to mean the end result of an argument that is supported by some premises. Such a conclusion is necessary in order to make a decision (at the very least to rationally make a decision). Thus, using hindsight to critique a decision is to judge a conclusion that a decision is based on as unsupported by a *new* argument made by including the new piece of information or knowledge as a premise. This is not what I am doing, because I am not making a new argument including a new premise that would show the conclusion used for a decision is unsupported by said new argument. Instead, I am saying that the conclusion of the argument from the OPC witnesses Lena Mantle P.E., Dr. Geoff Marke, and John Robinett at the time

that the decision not to acquire and build J-Class combustion turbines was made (and continued to be made) was correct and was supported *at those times* by the premises of the argument.

Q. Two of these plants are being built in Kansas and half of the capacity is being assigned to the Evergy Kansas utility. Has the Kansas Commission Corporation or its Staff commented on these plants up to this point?

A. Yes, the Kansas Commission Corporation's Staff has recently testified in the case before the Kansas Commission for the two CC plants in its service territory. KCC Staff deputy director of utilities was very explicit in his testimony:

> "I spent quite a bit of time in my testimony in this docket on the issue of reliability for these power plants…As you know, every major national or regional reliability organization for a couple years now has really been sounding the alarm, saying, 'Hey, we need to slow down a little bit on the energy transition.' This is not the time to be making permanent retirement decisions. Especially for winter reliability, we really need to maintain the dispatchable capacity we have. We might need to add new dispatchable capacity. So I think we need these plants."[36] Mr. Grady discussed the uncertainty of the future for solar and wind facilities as "It's getting more and more difficult to build those kind of resources."[37]

The concerns about the reliability of EMW's generation and their ability to meet SPP capacity requirements that I have stated in this testimony are shared by the KCC Staff in their case for the two CC plants in this case. The

[36] Morgan Chilson, "KCC staff stress need for 'reliable' power generation, defend support of Evergy natural gas plants", Kansas Reflector, April 23,2025, https://kansasreflector.com/2025/04/23/kcc-staff-stress-need-for-reliable-power-generation-defend-support-of-evergy-natural-gas-plants/.
[37] *Ibid.*

need for these plants is clear, and has been for longer than the Company is willing to admit; however, I have shown above that this was all known by Staff and OPC for years and the effects were foreseeable by the Company.

Q. What are the public comments that have been made about this CCN and where can they be found?

A. I have attached the public comments as exhibit JS-R-8. The comments are of two general categories: (1) customers are concerned that this CCN, if granted, will cause large rate increases that will impact their already burdensome bills, and (2), some customers feel that the Company should pursue only renewable generation instead of the dispatchable combustion turbines applied for in this CCN. I include these comments here so that the Commission may see them, review them, and address them how it sees fit.

Q. Does this conclude your testimony?

A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Evergy Missouri West, Inc. d/b/a Evergy Missouri West and Evergy Metro, Inc. d/b/a Evergy Missouri Metro for Permission and Approval of a Certificate of Public Convenience and Necessity for Natural Gas Electrical Production Facilities	))))))	Case No. EA-2025-0075

AFFIDAVIT OF JORDAN SEAVER

STATE OF MISSOURI)
) **ss**
COUNTY OF COLE)

Jordan Seaver, of lawful age and being first duly sworn, deposes and states:

1. My name is Jordan Seaver. I am a Policy Analyst for the Office of the Public Counsel.

2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.

3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

Jordan Seaver
Policy Analyst

Subscribed and sworn to me this 25th day of April 2025.

TIFFANY HILDEBRAND
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES AUGUST 8, 2027
COLE COUNTY
COMMISSION #15637121

Tiffany Hildebrand
Notary Public

My Commission expires August 8, 2027.