

**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 for Permission)
and Approval of a Certificate of Convenience and) Case No. EA-2026-0154
Necessity Authorizing it to Construct, Install,)
Own, Operate, Manage, Maintain, and Control a)
Natural Gas Electrical Production Facility)

**APPLICATION OF EVERGY MISSOURI METRO
FOR A CERTIFICATE OF CONVENIENCE AND NECESSITY**

COMES NOW, Evergy Metro, Inc. (“Evergy Metro”) d/b/a Evergy Missouri Metro (“Evergy Missouri Metro,” “EMM,” “Company,” or “Applicant”), pursuant to Sections 393.170.1¹ and 393.135.2, and to 20 CSR 4240-2.060 and 20 CSR 4240-20.045, files this Application (“Application”) to the Missouri Public Service Commission (“Commission” or “PSC”) for a Certificate of Convenience and Necessity (“CCN”).

Evergy Missouri Metro requests that the Commission authorize it to construct, install, own, operate, manage, maintain, and control a 440 MW simple-cycle gas turbine electric generating facility known as Mullin Creek #2 which will be located in Nodaway County, Missouri (“Mullin Creek #2,” “Project” or “Asset”).

Evergy Missouri Metro also seeks variances, pursuant to Section (3)(C) of 20 CSR 4240-20.045 (“CCN Rule”), to provide an overview of plans for operating and maintaining the Asset, and an overview of plans for restoration of safe and adequate service, as required under Sections 6(I) and 6(J) of the CCN Rule, in a later submission.

The Company requests the Commission to find under the CCN Rule’s Section (2)(C) that its decision to construct and operate Mullin Creek #2 for Evergy Metro’s Missouri customers is

¹ All statutory citations are to the Missouri Revised Statutes (2016), as amended.

prudent. EMM also requests, pursuant to Section 393.135.2(1), that the Commission determine in this Section 393.170 proceeding the amount of construction work in progress (“CWIP”) that may be included in rate base for Mullin Creek #2.

Finally, Evergy Missouri Metro asks the Commission to issue an Order granting the relief requested in this Application by December 23, 2026.

In support of this Application, the Company states:

I. Applicant Evergy Metro, Inc.

1. Evergy Metro, Inc. 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 Metro, Inc. is an “electrical corporation” and a “public utility” subject to the jurisdiction, supervision, and control of the Commission under Chapters 386 and 393. Its 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 Metro in western Missouri, is a wholly owned subsidiary of Evergy, Inc. (“Evergy”). The other public utilities wholly owned by Evergy are Evergy Missouri West, Inc. (“EMW”) and Evergy Kansas Central, Inc. (“EKC”). EMM has no annual report or regulatory assessment fees that are overdue.

3. Evergy Missouri Metro has no pending actions, or final unsatisfied judgments or decisions against it from any state or federal agency, or any court that involves customer services or rates which action, judgment, or decision has occurred within three years of the date of this Application, except for: *Show Me Ethanol, LLC v. Evergy Missouri Metro*, Docket No. EC-2026-0064.

4. In addition to serving counsel named below, all correspondence, pleadings, notices, orders, and other communications regarding this proceeding should be sent to:

Kevin Gunn
Vice President of Regulatory and Government Affairs
Eversource Energy, Inc.
1200 Main Street
Kansas City MO 64105
(816) 716-0553
Kevin.gunn@eversourceenergy.com

Matthew W. Dority
Director – Regulatory Affairs
Eversource Energy, Inc.
1200 Main Street
Kansas City MO 64105
(816) 652-1289
matthew.dority@eversourceenergy.com

Anthony R. Westenkirchner
Senior Paralegal, Legal Department
Eversource Energy, Inc.
1200 Main Street
Kansas City MO 64105
(816) 556-2668
anthony.westenkirchner@eversourceenergy.com

5. Eversource Missouri Metro filed its Notice of Intended Case Filing (“60-Day Notice”) to comply with the 60-day notice provision of 20 CSR 4240-4.017(1) on December 19, 2025.

6. In further support of this Application, the Company has contemporaneously filed the direct testimony of the following nine witnesses:

<u>Witness</u>	<u>Subject-Matter Summary</u>
Kevin Gunn	Overview of the Project, Basis for Granting CCNs under the Commission’s traditional Tartan factors and decisional prudence
Jason Humphrey	Overview of generation planning/development in connection with the Integrated Resource Planning (“IRP”) process
Kyle Olson	Selection of natural gas generation units; the location of the projects; the Owner’s Engineer; the Engineer, Procure and Construct contractor; the Power Island Equipment vendor; and transmission interconnection issues
Cody VandeVelde	Review and discussion of IRP process and how it supports the Application and the proposed Project

<u>Witness</u>	<u>Subject-Matter Summary</u>
Ronald Klote	Construction work in progress accounting under Section 393.135.2 and cost allocation issues
John Grace	Financing and ownership of the Project
JP Meitner	Natural gas fuel and market issues and Evergy Missouri Metro's gas procurement plan
John Carlson	Project construction and governance controls

7. Data requests concerning this Application should be addressed to: Regulatory.Affairs@evergy.com.

II. CCN Request for Mullin Creek #2

A. Project Description

8. To respond to the existing and evolving critical need to deploy dispatchable generation resources in a timely fashion, Evergy Missouri Metro seeks a CCN to construct, install, own, operate, manage, maintain, and control the SSGT Mullin Creek #2 generating facility that will be constructed in Nodaway County, Missouri. This Asset will be 100% owned by Evergy Missouri Metro and will serve the Company's existing and future customers, including significant expected new loads. The Project will be included in EMM's rate base, with its prudently incurred costs to be recovered in retail rates, as approved by the Commission. Constructing this Project is an important part of a larger overall plan called for by the Company's Preferred Plans in the 2025 Annual IRP Update filed on March 13, 2025 in No. EO-2025-0250, and its 2026 Annual IRP Update filed on May 7, 2026 in No. EO-2026-0188. The Project will help meet Evergy Missouri Metro's current and forecasted energy and capacity requirements, as identified in these IRP reports, as well as in ongoing resource planning and modeling work by the Company which will support a generation portfolio that is reliable, sustainable, and affordable.

B. CCN Rule Requirements

9. This Application is submitted pursuant to the Commission’s CCN Rule which requires that the Company receive a CCN before it begins construction of an electric plant under Section 393.170.1. Such a “construction” or “line” CCN is required if an “electric generating plant ... is expected to serve Missouri customers and be included in the rate base used to set their retail rates regardless of whether the item(s) to be constructed or operated is located ... inside or outside Missouri;” See CCN Rule §§ (1)(A)1, (1)(B)1, and (2)(A)2.

10. Section (6) of the CCN Rule requires that an application for a construction CCN include eleven categories of information regarding the proposed asset.

11. Section (6)(A) requires “A description of the proposed route or site of construction;” Mullin Creek #2 will be constructed approximately eight miles south of Maryville, Missouri in Nodaway County. It can be accessed by road near 40°13’20.51”N and 94°52’5.11”W. This Project will be proximate to Mullin Creek #1, for which the Commission granted a construction CCN to EMW in July 2025.² A detailed description of the facility to be constructed, including its proposed routes and sites is provided in the direct testimony of J Kyle Olson, Evergy’s Director of Conventional Generation Projects.

12. Section (6)(B) requires “A list of all electric ... conduit, wires, cables, and lines of regulated and nonregulated utilities, railroad tracks, and each underground facility as defined in Section 319.015, which the proposed construction will cross;” Mullin Creek #2 will not cross any other utility facilities, railroad tracks, or an underground facility.

13. Section (6)(C) requires “A description of the plans, specifications, and estimated costs for the complete scope of the construction project that also clearly identifies what will be the

² See Report & Order at 7, In re App. of Evergy Mo. West, Inc. for a CCN for Natural Gas Elec. Prod. Facilities, No. EA-2025-0075 (July 31, 2025).

operational features of the asset once it is fully operational and used for service;” Mullin Creek #2 will consist of a single advanced J-Class gas turbine, an electrical generator, and associated auxiliary equipment which will be located inside of separate heated enclosures, as described by Evergy witness Mr. Olson. The estimated costs for the complete scope of the construction of Mullin Creek #2, excluding allowance for funds used during construction (“AFUDC”) and the effect of any CWIP allowed in rate base, is ** [REDACTED] **. These amounts will be financed through EMM’s available utility financing resources with the intent that the Asset will be included in rate base through the Commission’s traditional ratemaking and cost of capital procedures, as explained in the direct testimony of Evergy witness John M. Grace, Senior Director, Corporate Planning and Financial Performance.

14. This Project is a key part of Evergy’s plans to achieve the preferred solution to meet the energy and reliability needs of the Company’s customers over the twenty-year planning horizon of its Integrated Resource Plans. Cody VandeVelde, Evergy’s Senior Director of Strategy and Long-Term Planning, explains this process in his direct testimony, and why the Project is the best solution for Evergy Missouri Metro. The selection of an Owner’s Engineer (“OE”), the Power Island Equipment (“PIE”) manufacturer, and the Engineering, Procurement and Construction (“EPC”) contractor for the Project was based on the competitive request-for-proposal (“RFP”) process followed for Mullin Creek #1, as discussed by Company witness J Kyle Olson in his direct testimony. Mullin Creek #2 will utilize the same OE and the same EPC contractor, as well as the common electricity generation technology supplied by the PIE manufacturer that will be used for Mullin Creek #1. Therefore, the economies of scale existing in these core functions will lead to an efficient, reliable, and cost-effective construction project.

CONFIDENTIAL

15. Section 6(D) requires that an application include: “The projected beginning of construction date and the anticipated fully operational and used for service date of the asset;” The projected beginning of construction date for Mullin Creek #2 is early 2027, well before October 2030 when it is expected to be fully operational, and used and useful for service.

16. Section 6(E) requires that an application include: “A description of any common plant to be included in the construction project;” As Mr. Olson describes in his direct testimony, Mullin Creek #2 will share an operations and maintenance building, as well as a service and fire water tank with Mullin Creek #1.

17. Section 6(F) requires that an application include: “Plans for financing the construction of the asset;” As described by Mr. Grace in his direct testimony, the Project will be financed using the Company’s existing debt and equity financing structure, similar to other capital investments made by EMM.

18. Section 6(G) requires that an application include: “A description of how the proposed asset relates to the electric utility’s adopted preferred plan under 4 CSR 240-22;” As discussed in the direct testimony of Mr. VandeVelde, Evergy Missouri Metro’s 100% ownership in Mullin Creek #2 corresponds to 440 MW of thermal generation for EMM by 2031, as identified in the Company’s 2025 and 2026 Annual IRP Updates.

19. Section 6(H) requires that an application include: “An overview of the electric utility’s plan for this project regarding competitive bidding, although competitive bidding is not required, for the design, engineering, procurement, construction management, and construction of the asset;” As described in Mr. Olson’s direct testimony, the Owner’s Engineer (“OE”) provides augmented technical and managerial support to the owner of a project which in this case is the Applicant. The OE’s support will include assistance with EPC oversight, as the OE serves

as the Company's representative in the EPC contractor's procurement activities. Relying on the RFP process discussed by Mr. Olson in his direct testimony in Case No. EA-2025-0075, where the Commission granted a CCN for the construction of Mullin Creek #1, the Company is using the same OE services contract that it entered into with Burns & McDonnell Engineering Company, Inc. ("B&M") for the construction of Mullin Creek #2 to maximize efficiencies.

20. With assistance from B&M, the Company had issued a competitive RFP for the Power Island Equipment ("PIE") supplier which resulted in the selection of Mitsubishi Power Americas, Inc. ("Mitsubishi"). With similar assistance from B&M, Evergy developed an RFP for an EPC Contractor and selected Kiewit Power Constructors Co. ("Kiewit").

21. Section 6(I) requires that an application include: "An overview of plans for operating and maintaining an asset;" Evergy currently operates over 12,000 MW of generation facilities, including natural gas-fired generating facilities. When completed, the Project will join Evergy's generation fleet and benefit from Evergy's extensive knowledge and experience gained from years of operating similar generating facilities. Evergy Missouri Metro will provide more detailed operations and maintenance plans when they are available closer to the Project's commercial operation date. The Company respectfully requests that the Commission grant a variance from this provision under 20 CSR 4240-2.060(4) and CCN Rule Section 3(C).

22. Section 6(J) requires that an application include: "An overview of plans for restoration of safe and adequate service after significant, unplanned/forced outages of an asset;" Evergy Missouri Metro also requests a variance from this provision under 20 CSR 4240-2.060(4) and CCN Rule Section 3(C), so that its plans for the restoration of safe and adequate service can be provided closer to the time that the Project begins commercial operation.

23. No landowners will be directly affected by the Project, but as noted by Mr. Olson, the Company has worked with the nearest neighbors to resolve any concerns in advance of construction. As further noted by Mr. Olson in his direct testimony, outreach has occurred with local governmental authorities and the community in Nodaway County.

C. Public Convenience and Necessity under Section 393.170

24. Pursuant to Section 393.170.3 and the requirements of CCN Rule Section (3)(A), the Company provides the following facts showing that granting the application “is necessary or convenient for the public service.”

25. Missouri courts have consistently held that “necessity” does not mean “essential” or “absolutely indispensable.” The concept of necessity is that the additional service “would be an improvement justifying its costs” and be “desirable for the public welfare.” United for Missouri v. PSC, 515 S.W.3d 754, 759 (Mo. App. W.D. 2016); State ex rel. Intercon Gas, Inc. v. PSC, 848 S.W.2d 593, 597-98 (Mo. App. W.D. 1993). If “the public convenience will be enhanced” and “there is [a] reasonable necessity” for the service, then the public “convenience and necessity” and “need” are served by granting the CCN. State ex rel. Beaufort Transfer Co. v. Clark, 504 S.W.2d 216, 219 (Mo. App. K.C. 1973). As the Commission recently observed, “the inconvenience to the public occasioned by [the] lack of the proposed service is great enough to amount to a necessity.”³

26. The Commission generally applies five criteria known as the Tartan factors in CCN cases.⁴ The Tartan factors are: (1) There must be a need for the service; (2) The proposal must be economically feasible; (3) The applicant must have the financial ability to provide the service; (4)

³ Report & Order at 28, In re App. of Evergy Mo. West, Inc. for a CCN for Natural Gas Prod. Facilities, No. EA-2025-0075 (July 31, 2025).

⁴ In re Tartan Energy Co., No. GA-94-127, 1994 WL 762882 at 3 (1994). While a project is not required as a matter of law to meet the “Tartan Factors,” the Commission has traditionally used the factors when evaluating CCN applications. United for Missouri v. PSC, 515 S.W.3d 754, 759 (Mo. App. W.D. 2016) (“specific criteria have not been set out by statute”).

The applicant must be qualified to provide the service; and (5) The proposed service must promote the public interest. Missouri Landowners Alliance v. PSC, 593 S.W.3d 632, 638 & n.6 (Mo. App. E.D. 2019), *aff'g* Report & Order on Remand at 40-47, In re Grain Belt Express Clean Line LLC, No. EA-2016-0358 (Mo. P.S.C., Mar. 20, 2019). An affirmative finding on the first four factors will generally lead to a finding that the requested CCN will promote the public interest. In re Tartan Energy Co., No. GA-94-127, 1994 WL 762882 at *14 (Mo. P.S.C. 1994).

27. Evergy Missouri Metro witness Kevin Gunn, Vice President of Regulatory and Government Affairs, provides an overview of the Company's request for the CCN. He explains in his direct testimony how the Project meets the requirements set forth in Section 393.170, the CCN Rule, as well as the Commission's traditional Tartan standards for evaluating and approving CCN requests.

28. Mr. Gunn also testifies that the Company's decision to construct and operate the Project for Evergy Metro's Missouri customers is prudent and that the Commission should so determine under Section (2)(C) of the CCN Rule. He also discusses EMM's request that the Commission determine under Section 393.135.2(1) the amount of CWIP that may be included in rate base for Mullin Creek #2, which the direct testimony of Company witness Ronald Klote addresses in detail. Such a decision will incentivize the construction of the Project, provide savings to customers over the long run, and expand the Company's electrical capacity.

1. There is a Need for Mullin Creek #2

29. The Company's 2026 Annual IRP Update, filed on May 7, 2026, in No. EO-2026-0188, assessed and confirmed EMM's increased capacity needs based not only on load growth, but also on the higher resource adequacy requirements of SPP. In August 2024 SPP's board of directors approved a 2025 proposal to set the minimum summer season planning reserve margin ("PRM") at 16% for the summer of 2026, and a 36% winter season PRM for the winter of 2026-

2027.⁵ SPP advised the Commission at its May 21, 2025 Public Meeting that these PRM levels will be increased further in 2029 to 17% for the summer season and to 38% for the winter season of 2029-2030.⁶ FERC approved SPP's tariff revisions that established these higher PRM requirements in August 2025.⁷

30. The direct testimony of Mr. Humphrey and Mr. Olson discuss the Company's ongoing efforts to execute Evergy's corporate strategy of affordability, reliability, and sustainability. This includes investments in new generation of approximately \$9.3 billion of natural gas, renewable, and battery storage capacity to support historic economic development opportunities in Missouri and Kansas in an "all-of-the above" approach to resource planning. In light of the dramatic increase in load growth and the role that dispatchable generation must play in response to them, the need for Mullin Creek #2 is clear. Evergy Metro's resource plans have been developed to respond to this need for additional capacity, as well as the result of SPP's higher planning reserve margin requirements, more rigorous seasonal capacity accreditation standards, and the region's increasingly volatile weather.⁸

31. The direct testimonies of Mr. Gunn, Mr. VandeVelde, and Mr. Humphrey further explain how the addition of Mullin Creek #2 to Evergy Missouri Metro's generation fleet will provide an economical and dispatchable resource that will allow the Company to meet today's significant increase in customer demand that will continue to grow in the future. Evergy

⁵ See SPP Board Approves New Planning Reserve Margins to Protect Against High Winter, Summer Use (Aug. 6, 2024), <https://www.spp.org/news-list/spp-board-approves>.

⁶ See Mo. Public Serv. Comm'n Public Meeting, No. AGND-2025-0049, SPP Resource Adequacy & Summer Assessment at 10, delivered by Bruce Rew, Senior Vice President of Operations (May 21, 2025).

⁷ See Order Accepting Tariff Revisions at 9-12, Southwest Power Pool, Inc., 192 FERC ¶ 61,161, No. ER25-89 (Aug. 19, 2025).

⁸ See Report & Order at 12, EA-2025-0075; *Our Generational Challenge: Reliable Future for Electricity* at 1-2, Southwest Power Pool, <https://www.spp.org/documents/72058/our%20generational%20challenge%20paper.pdf> (2024).

announced on February 19, 2026⁹ that it recently signed electric service agreements with two new large customer projects and that it is expanding two existing projects. These projects are designed to serve data centers, with a projected peak steady state load of approximately 1,900¹⁰ MWs. And, Mr. VandeVelde explains that the 2026 IRP Annual Update includes forecasts associated with two large-load customers in EMM’s service territory, one of which signed a Large Load Power Service (“LLPS”) Energy Services Agreement (“ESA”) in 2026. The LLPS ESAs governing large-load projects will be subject to the Company’s LLPS Rate Plan tariff¹¹, which the Commission approved in February 2026, and which is currently in effect.

32. The Commission recognized this continuing surge in new load and the need to approve tariffs that would provide service to loads of 100 MWs or more. In Evergy’s LLPS Rate Plan case, the PSC confirmed that under Section 393.1300.7 the LLPS tariff will “reasonably ensure” that the rates of large loads will reflect their “representative share of the costs incurred to serve” them and will “prevent other customer classes’ rates from reflecting any unjust or unreasonable costs arising from such service.”¹² The Commission observed that data centers and similar loads, in addition to being “large consumers of power,” can serve as “economic and operational partners that provide important advantages to electric utilities and their customers.”¹³

33. The PSC’s Large Load Customer Order summarized the “advantages” and “benefits” that large loads can bring to electric utilities, referring to them as “partners” that can “help[] distribute fixed costs across a larger energy volume” which “contributes to a lower average

⁹ Evergy, Inc., New Release (Form 8-K, Ex. 99.1) (Feb. 19, 2026).

¹⁰ Evergy, Inc., Annual Report at 40 (Form 10-K) (Feb. 18, 2026).

¹¹ Id. See Order Approving Tariffs at 1-2 (Feb. 25, 2026), In re Evergy App. for Approval of Tariffs to serve Large Load Customers, No. EO-2025-0154.

¹² Report & Order at 7, 22-23 (Nov. 13, 2025), In re Evergy App. for Approval of Tariffs to Serve Large Load Customers, No. EO-2025-0154 (“Large Load Customer Order”), *citing* § 393.130.7 (enacted as part of S.B. 4 in 2025).

¹³ Id. at 9, ¶ 8.

cost per kilowatt-hour for all customers.”¹⁴ The Commission, in particular, noted that “AI technology, combined with the widescale electrification of various industries, ... is driving significant electric load growth across the country”¹⁵ Given these developments in Missouri and in the Southwest Power Pool, Inc. (“SPP”) region, the need for flexible resources like Mullin Creek #2 is clear.¹⁶

34. In light of this rapid and steady load growth occurring in the service territories of the Company, its affiliated utilities, and the region’s other electric utilities, SPP has proposed new and innovative proposals to manage these developments and their needs. The Expedited Resource Adequacy Study (“ERAS”) was proposed by SPP in May 2025 to provide a framework for the accelerated study of generator interconnection requests to address urgent, near-term resource adequacy needs.¹⁷ Moving quickly, FERC accepted SPP’s proposal, finding that the ERAS eligibility criteria and requirements “are intended to ensure that non-speculative, ‘shovel ready’ projects ... move expeditiously to ... execution.”¹⁸ On rehearing, FERC confirmed its decision that the ERAS process provided an appropriate framework “to address urgent, near-term resource adequacy needs” which it described as “a looming resource adequacy shortfall.”¹⁹ As Mr. Olson notes in his direct testimony, the ERAS process identified two categories of transmission expenses for the Project: (a) Interconnection Facilities costs of approximately \$13 million and (b) Network Upgrades of approximately \$6.2 million. With SPP’s new procedures to study and interconnect

¹⁴ *Id.* at 10, ¶ 9.

¹⁵ *Id.* at 11, ¶ 13.

¹⁶ Applicant Evergy Metro, Inc., as well as Evergy Missouri West, Inc. and Evergy Kansas Central, Inc. are transmission owning members of Southwest Power Pool, Inc., a regional transmission organization (“RTO”) recognized by FERC.

¹⁷ Order Accepting Tariff Revisions, Subject to Condition at 1-2, Southwest Power Pool, Inc., 192 FERC ¶ 61,062, No. ER25-2296 (2025) (“ERAS Order”).

¹⁸ *Id.* at 89.

¹⁹ Order Addressing Arguments Raised on Rehearing at 1-2, 71, Southwest Power Pool, Inc., 194 FERC ¶ 61,051, No. ER25-2296-002 (Jan. 22, 2026) (“ERAS Rehearing Order”).

new large loads and the generation to serve them, Mullin Creek #2 is the logical new resource to provide capacity and energy to meet these needs, along with EMM's other generation assets. As an owned resource, the Project will be under the Company's operational control, and its costs will be recovered in base rate, as approved by the Commission.

35. In his direct testimony Mr. VandeVelde reviews the updated IRP modeling analysis which shows that the increase in large industrial and commercial loads in Evergy Metro's service area has placed a significant strain on the Company's existing resources. These developments have required proactive planning and system expansion to ensure reliability, capacity, and flexibility. Mullin Creek #2 will satisfy that need to ensure that safe and adequate service is provided.

2. Mullin Creek #2 is Economically Feasible

36. As described in the direct testimonies of Mr. VandeVelde and Mr. Humphrey, the Company's decision to add the Project to its resources is economically feasible as it will produce efficient, low-cost energy in Missouri. The Project will provide a dispatchable, fuel-diverse resource to the Company's generation fleet while helping EMM meet its forecasted capacity and energy needs.

37. Mullin Creek #2 will be a highly efficient natural gas generation resource that will enable the continuing modernization of Evergy's generation fleet, consistent with its "all-of-the-above" resource strategy. As Mr. Olson explained in his direct testimony, the Asset will be able to operate on liquid fuel as it will include both a fuel tank that can run for 48 hours at full load, as well as fuel unloading stations.

38. Because the Project will utilize the same OE and EPC contractor engaged to construct Mullin Creek #1, as well as a common generation technology with the same PIE manufacturer, the economies of scale within these core functions will lead to a more efficient,

reliable, and cost-effective delivery of the facility. Mullin Creek #2 will also participate in the Gas Fuel Supply Plan, including the competitive fuel procurement process and the storage plans, being developed for Mullin Creek #1, as described in the direct testimony of Company witness JP Meitner.

39. The dispatchability and dual-fuel capability of Mullin Creek #2 support its being an economically feasible resource that will meet the requirements of SPP's Performance Based Accreditation methodology and the related Fuel Assurance tariff revisions recently approved by FERC.²⁰

3. Evergy Missouri Metro is Able to Finance the Mullin Creek #2

40. The direct testimony of Company witness John Grace explains that Evergy Missouri Metro has the financial resources to generate and raise the capital necessary to proceed with the construction of Mullin Creek #2. The Company has proven experience in financing the purchase, construction, and operation of generating assets that serve Missouri customers. EMM has adequate short-term liquidity and is able to access additional short-term liquidity as needed.

41. Mr. Grace notes that Evergy Metro sells an undivided percentage ownership interest in its retail electric accounts receivable to an independent outside investor, and that accounts receivable sales facility provides borrowing opportunities for the Company. Evergy Metro also has access to the capital investment markets which can provide additional financing for the Project, if necessary.

²⁰ See Further Order on Tariff Revisions following Briefing, Southwest Power Pool, Inc., 192 FERC ¶ 61,058 at paras. 104, 124 and 178, 2025 WL 2112674 at 21, 25, 37 (July 18, 2025) ("Accreditation Order"), *modified and sustained*, Order Addressing Arguments raised on Rehearing, 193 FERC ¶ 61,198, 2025 WL 3567532 (Dec. 12, 2025). The Accreditation Order approved SPP's proposals to adopt a new performance-based accreditation ("PBA") methodology for conventional resources, as well as fuel assurance incentives for those resources.

42. Evergy Missouri Metro currently has stable credit ratings of Baa1 and A- from Moody's and Standard & Poor's, respectively. The Company will provide service from the Project by including it in EMM's rate base at its authorized weighted average cost of capital.

4. Evergy Missouri Metro is Qualified to Construct, Operate and Provide the Service of Mullin Creek #2 to the Public

43. As the direct testimony of Jason Humphrey states, Evergy Missouri Metro has constructed and operated various electric generating plants for over a hundred years. Likewise, its affiliates EMM and EKC have operated and maintained generating units in Missouri and Kansas, respectively, for many years. Such experience and expertise will be utilized when EMM begins to operate the Project, along with the combined experiences of B&M, Mitsubishi, and Kiewit as the EPC contractor for the Project.

44. Evergy Metro has owned and operated many natural gas-fired electric generating plants in western Missouri and eastern Kansas and continues to do so today. These plants include natural gas units at the Hawthorn, West Gardner, Northeast, and Osawatomie facilities.

5. Granting Mullin Creek #2 a CCN is in the Public Interest.

45. In addition to the factors discussed above, which demonstrate that approval of the Application is in the public interest, adding the Project to the generation portfolio of Evergy Missouri Metro will provide a reliable and dispatchable energy resource to serve the rapidly growing demand for electricity in its service territory.

46. Because Mullin Creek #2 will be located on property that Evergy already owns and is adjacent to the Mullin Creek #1 unit, the Project is in the public interest as no additional land will need to be acquired. Moreover, because Mullin Creek #2 will utilize the same OE and the same EPC contractor, as well as the common generation technology supplied by the PIE

manufacturer for Mullin Creek #1, the economies of scale that will be achieved in these core functions are in the public interest.

III. Conclusion and Request for Approval

47. This Application seeks a construction CCN for Mullin Creek #2 that will provide Evergy Missouri Metro with the ability to continue to generate safe, reliable, and efficient electricity, while meeting the challenges of increased load growth in a responsible and prudent manner. It is, therefore, in the best interest of all parties to ensure that the benefits of the Project flow to Missouri customers in a timely manner.

48. Because the Company cannot issue official notices to proceed (“NTP”) on Mullin Creek #2 until it receives a final favorable order from the Commission, there is an increased risk that the Project will not achieve its targeted commercial operations date if the NTP cannot be issued on or before early 2027. Therefore, Evergy Missouri Metro respectfully urges the Commission to issue a final order no later than December 23, 2026, with an effective date as soon as practicable thereafter, consistent with the attached proposed procedural schedule (Exhibit A).

WHEREFORE, the Company respectfully requests that the Commission:

(1) Grant Evergy Missouri Metro a construction Certificate of Convenience and Necessity, pursuant to Section 393.170.1 and the CCN Rule, 20 CSR 4240-20.045, that authorizes it to construct, install, own, operate, maintain, manage and control the Project, along with all existing facilities, structures, fixtures, and other equipment related to Mullin Creek #2;

(2) Grant variances from 20 CSR 4240-20.045(3)(C), (6)(I), and (6)(J) so that an overview of the Applicant’s plans to operate and maintain the Project, and its plans for restoration of safe and adequate service can be provided closer to the time when Mullin Creek #2 will commence commercial operation;

(3) Find that the Company's decision to construct, operate, own, manage, maintain, and control the Project for Evergy Metro's Missouri customers is prudent under Section (2)(C) of the CCN Rule;

(4) Determine the amount of construction work in progress that may be included in rate base for Mullin Creek #2, pursuant to Section 393.135.2(1).

(5) Issue its Order no later than December 23, 2026; and

(6) Provide any further relief, findings, or orders that the Commission believes just, reasonable, and in the public interest.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MBN 39586
Cole Bailey, MBN 77268
Corporate Counsel
Evergy, Inc.
1200 Main Street
Kansas City, MO 64105
Phone: (816) 556-2314
roger.steiner@evergy.com
cole.bailey@evergy.com

Karl Zobrist, MBN 28325
Jacqueline M. Whipple, MBN 65270
Chandler Hiatt, MBN 75604
Dentons US LLP
4520 Main Street, Suite 1100
Kansas City, MO 64111
Phone: (816) 460-2400
Fax: (816) 531-7545
karl.zobrist@dentons.com
jacqueline.whipple@dentons.com
chandler.hiatt@dentons.com

James M. Fischer, MBN 27543
Fischer & Dority, P.C.
2081 Honeysuckle Lane
Jefferson City, MO 65109
Phone: (573) 353-8647
jfischerpc@aol.com

Attorneys for Evergy Metro, Inc.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed, mailed postage-prepaid, or filed and served via EFIS to the parties in this proceeding this 14th day of May 2026.

/s/ Roger W. Steiner

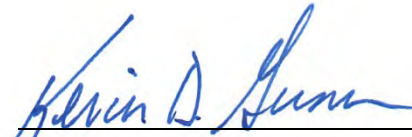
Attorney for Evergy Missouri Metro

VERIFICATION

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

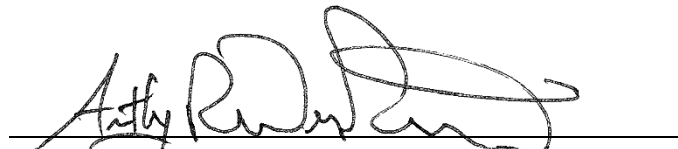
I, Kevin Gunn, state that I am Vice President – Regulatory & Government Affairs for Evergy, Inc., that I have reviewed the foregoing Application, that I am familiar with its contents, and that the statements contained therein are true and correct to the best of my knowledge and belief. Evergy has had no communication with the Office of the Commission within the prior 150 days regarding any substantive issue likely to arise in this case.

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 14th day of May 2026.



Notary Public

My commission expires: April 26, 2029



Proposed Procedural Schedule

60 Day Notice Filed	December 19, 2025
CCN App & Testimony Filed	May 14, 2026
Discovery Conference	July 15, 2026
Virtual Local Public Hearing	August 10, 2026
1 st Settlement Conference	August 14, 2026
Rebuttal Testimony	August 25, 2026
Settlement Positions Exchanged	August 28, 2026
Discovery Conference	September 1, 2026
2 nd Settlement Conference (if needed)	September 4, 2026
Testimony to support Settlement (if applicable)	September 11 2026
On-the-Record Presentation to Support Settlement (if applicable)	September 20, 2026
Surrebuttal/Cross-Surrebuttal	October 2, 2026
List of Issues and Witnesses, Order of Openings, Witnesses and Cross Examination	October 5, 2026
Last Day to Request Discovery	October 5, 2026
List of Exhibits	October 5, 2026
Position Statements	October 9, 2026
Evidentiary Hearing	October 20-21, 2026; October 23, 2026
Initial Briefs	November 13, 2026
Reply Briefs	November 24-26, 2026
Report & Order (requested)	December 23, 2026
Effective Date (10 days after Order)	January 2, 2027

Evergy Metro, Inc. d/b/a Evergy Missouri Metro

Docket No.: EA-2026-0154

Date: May 14, 2026

CONFIDENTIAL INFORMATION

The following information is provided to the Missouri Public Service Commission under CONFIDENTIAL SEAL:

Document/Page	Reason for Confidentiality from List Below
Application, ¶13, p. 6	3,4, and 6

Rationale for the “confidential” designation pursuant to 20 CSR 4240-2.135 is documented below:

1. Customer-specific information;
2. Employee-sensitive personnel information;
3. Marketing analysis or other market-specific information relating to services offered in competition with others;
4. Marketing analysis or other market-specific information relating to goods or services purchased or acquired for use by a company in providing services to customers;
5. Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public;
6. Strategies employed, to be employed, or under consideration in contract negotiations;
7. Relating to the security of a company's facilities; or
8. Concerning trade secrets, as defined in section 417.453, RSMo.
9. Other (specify) _____.

Should any party challenge the Company’s assertion of confidentiality with respect to the above information, the Company reserves the right to supplement the rationale contained herein with additional factual or legal information.