



June 22, 2026

Judge John T. Clark
Senior Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65102

RE: In re: Working Case for the Development of Rules Regarding Integrated Resource Planning for Electrical Corps. as Required by Section 393.1900, Case No. EW-2026-0091—Evergy’s Comments on Proposed 20 CSR 4240-21 Resource Planning for Electric Utilities

Dear Judge Clark:

Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively, “Evergy” or the “Company”) is pleased to offer the following comments on the proposed rules for Electric Resource Planning to implement Mo. Rev. Stat Section 393.1900¹, 20 CSR 4240-21, which are reflected in the attached Stakeholder Comment Table.

At the outset, Evergy appreciates the Missouri Public Service Commission’s (“Commission”) consideration and efforts to implement its feedback to date. Evergy primarily focuses its feedback on aspects of the proposed rules that are inconsistent with the language, structure, and policy objectives of Section 393.1900 and Senate Bill (“SB”), and that present the greatest impacts from a cost, feasibility, and implementation perspective.

In particular, Evergy is concerned that some elements of the proposed rule go beyond the framework directed by the General Assembly, and instead creates a highly complex and prescriptive planning regime that is neither required by nor supported under Section 393.1900. While the statute directs the Commission to adopt rules, it does not direct the Commission to prescribe detailed planning methodologies or require exhaustive analyses that exceed what is necessary to evaluate whether a resource plan is reasonable and prudent.² Moreover, Evergy is concerned that overly prescriptive rules may undermine the purpose of the Integrated Resource Plan (“IRP”) process by limiting Evergy’s ability to make reasonable planning and management decisions in response to changing circumstances, particularly given today’s rapidly evolving energy opportunities and challenges.

For example, proposed rule 20 CSR 4240-21.025 pertaining to pre-IRP process would require utilities to provide Staff of the Commission (“Staff”) and the Office of the Public Counsel (“OPC”) access to proprietary, third-party modeling software for purposes of performing

¹ All citations are to the Revised Statutes of Missouri (2016), as amended, unless otherwise noted.

² See Section 393.170; In re Tartan Energy Co., No. GA-94-127, 1994 WL 762882 at 3 (1994).

independent modeling runs. Notwithstanding that granting such access could violate Evergy's software licensing agreements, nothing in Section 393.1900 requires other stakeholders to create their own modeling analyses or resource plans for purposes of assessing the utility's proposed plan. As previously expressed to the Staff, this creates enormous challenges with both licensing and cybersecurity. It also presents a challenge as it is the primary responsibility of the Company to provide a plan, not any other parties. IRPs involve not only modeling, but take into account other considerations such as business models, public policy and practical implementation. Independent modeling runs may not take these into account and risk creating the illusion of a feasible alternative, even when the alternative cannot be implemented.

Similarly, proposed rule 20 CSR 4240-21.030 would impose highly prescriptive load forecasting requirements that also go beyond the scope of Section 393.1900. The proposed rule enumerates numerous load forecasting inputs and assumptions the utility would need to include in a resource plan and further dictates how the utility must develop its forecasting methodology. Section 393.1900, by contrast, merely directs the Commission to consider whether a plan adequately balances resource adequacy with anticipated peak load and seasonal peak demand forecasts. Mandating the type or form of detailed forecasting methodologies contained in the proposed rule expands the scope of Section 393.1900 beyond its specific authorization.

In other instances, the proposed rules would create substantive requirements that are at odds with the policy intent behind Section 393.1900 and Senate Bill 4. For example, while Section 393.1900's stated policy intent is to support economic development and "ensure Missouri can meet its growing electricity needs,"³ the proposed rules prescribe specific analytical approaches, modeling assumptions, documentation requirements, and forecasting methodologies, and would require detailed modeling and probability assessments for large load forecasting projects. Not only does this complexity go beyond what is contemplated in Section 393.1900, but it also stands to impair Evergy's ability to expeditiously procure and develop resources needed to support Missouri's economic development objectives in a timely and efficient manner.

In addition, certain proposed rule provisions duplicate existing IRP requirements by referencing state regulations and statutes that are already in effect and with which the Company already complies. In other instances, the proposed rules adopt overly broad and subjective terms that are difficult if not impossible to assess, quantify, or model. At early stages of an IRP process, including the pre-IRP process contemplated in the rules, projects, costs, and variables are typically high-level estimates, therefore it may be difficult for any utility to reasonably comply with such broad or subjective standards. Accordingly, Evergy is concerned that provisions like these stand to not only inject uncertainty into the resource planning process, but also materially increase the Company's administrative burden and compliance costs without a commensurate benefit. The draft IRP rule's general prescriptiveness goes beyond Senate Bill 4 statute and is expected to drive significant costs to comply. In addition to licensing fees and distributed energy resource potential study fees, the draft rule is likely to require incremental full-time equivalents and external consultants to perform overly prescriptive requirements for load forecasting at distribution and substation levels, financial modeling at rate class levels, and rate case modeling, amongst others. This could potentially cost hundreds of thousands, if not millions of dollars annually. Moreover, to the extent the proposed rules were to delay or jeopardize Evergy's ability to timely procure

³ Governor Kehoe Signs SB 4 Into Law, Securing Missouri's Energy Future and Economic Growth (Apr. 9, 2025).

generation resources, the rules could have potentially significant cost impacts at the generation portfolio level, which Evergy is unable to quantify at this stage.

Evergy remains concerned that the timelines associated with the pre-IRP proceeding, the IRP proceeding, and the interval between the conclusion of the pre-IRP proceeding and the subsequent IRP filing create significant challenges for timely converting planned projects into construction. Evergy recognizes that certain proposed timeframes are prescribed by statute; however, under the new IRP framework, more than 2.5 years may elapse between the initial pre-IRP filing and issuance of an order approving the IRP and implementation plan. Evergy therefore remains incentivized to shorten the overall process where feasible in order to preserve flexibility to respond to market dynamics, specific load growth, project opportunities, federal policy developments, and resource availability. The length of the contemplated timeline further underscores the importance of Evergy's proposed rule revisions that would allow for updates to be incorporated while the IRP is pending.

Last, many of the proposed rule provisions use rate impacts as a primary metric for determining the effectiveness of resource planning options. Evergy maintains, consistent with its original comments, that Net Present Value of Revenue Requirement ("NPVRR") should be a primary consideration. Resource planning objectives are incomplete without NPVRR as a primary metric. It provides a clear view of net rate impacts and cost-effectiveness across options over the full planning horizon, including demand-side versus supply-side resources and ensures optimization models yield reliable, positive results. Comparability in IRP modeling requires digestible metrics. NPVRR is one of the most critical IRP metrics and it should be used when balancing the factors mentioned in Section 393.1900.

In sum, although individual provisions may appear reasonable when viewed in isolation, collectively, the proposed rules create a framework that would require utilities to generate, document, and defend an extraordinary volume of information, much of which has limited relevance to the statutory objective of whether a preferred resource plan reasonably balances the factors identified in Section 393.1900. Based on Evergy's experience and judgment, long-term resource planning is both an art and a science. Resource planning requires utilities to exercise judgment amid evolving market conditions, technological developments, customer demand patterns, regulatory and policy considerations, and economic circumstances. It is thus important that the final rules preserve sufficient flexibility to allow utilities to adapt to these changing conditions while still providing the Commission with the information needed to reasonably evaluate each utility's resource plan.

Evergy's comments and recommendations on the proposed rules, as outlined in the attached Stakeholder Comment Table, reflect these above concerns and also seek to improve provisions that would benefit from greater clarity.

Again, Evergy appreciates the opportunity to provide input on the draft rules and looks forward to future engagement with the Commission and other stakeholders in developing a reasonable and workable path consistent with Section 393.1900.

Sincerely,

/s/ Roger W. Steiner

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Attachment: Stakeholder Comment Table

Stakeholder	Rule Citation	Requested Change	Summary of Comment
Eversource, Inc.	20 CSR 4240-21.015(86)	(86) Sensitivity means a model run that changes a single key input to understand how that input affects or drives results across scenarios.	A restriction to a single key input is overly narrow. In complex resource modeling, sensitivities may involve correlated inputs that may be varied together to produce meaningful results. Restricting sensitivities to single-input changes may produce misleading results that fail to capture correlations between variables. Eversource recommends striking that limitation.
Eversource, Inc.	20 CSR 4240-21.015(95)	(95) Transmission losses means the amount of real power, expressed as a percentage, that is lost in transmission facilities, when delivering energy to load.	"Real" power is ambiguous, thus Eversource recommends striking. Further clarification is needed on the term's intended meaning.
Eversource, Inc.	20 CSR 4240-21.020(2)(A)	(A) The pre-IRP proceeding, as outlined in section 393.1900.1., RSMo, shall be conducted to establish alternative resource plans, scenarios, sensitivities, relevant emerging factors, and other operating factors that an electric utility shall take into account in its IRP filing made pursuant to section (1).	The new requirement to "establish alternative resource plans, scenarios, sensitivities, relevant emerging factors, and other operating factors" is extraordinarily broad compared to the rule's original language and potentially creates limitless analytical and administrative burden. Eversource recommends striking these new requirements.
Eversource, Inc.	20 CSR 4240-21.020(2)(B)(2)	Directly n Notify all intervenors in the electric utility's most recent general rate case and most recent IRP case of the upcoming activities, as outlined in paragraphs (2)(B)3. and (2)(B)5.	The rule does not define "direct" notice. Constructive notice of filings exists through Electronic Filing and

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			Information System. Therefore, requiring an undefined “direct” notice is unnecessary and creates inherent procedural compliance risk.
Eversource, Inc.	20 CSR 4240-21.020(2)(B)(12)	No later than eight (8) months after the electric utility files the pre-IRP minimum filing requirements, in accordance with paragraph (2)(A)1., the commission shall issue an order establishing <u>addressing</u> the information outlined in section 393.1900.1, RSMo.	“Establishing” is not appropriate here; because a Commission order cannot create statutory requirements, “addressing” is the more accurate term.
Eversource, Inc.	20 CSR 4240-21.020(2)(C)(4)	Identification of significant proposed federal and state environmental regulations, laws or rules, and an explanation of how those regulations, laws, or rules apply to the applicable resource type, and a description of the expected timeframe when each proposed regulation, law or rule will take effect;	Requiring a “description of the expected timeframe” for proposed laws or regulations is extends beyond the requirements of Section 393.1900.2-3 RSMo and assumes a level of certainty about legislative and regulatory process that does not exist. Eversource recommends striking this requirement.
Eversource, Inc.	20 CSR 4240-21.020(2)(C)(8)(A)-(B)	Total <u>estimated</u> costs shall: A. Include capital, fixed and variable operation and maintenance costs, fuel, and any other costs that are relevant for the particular technology; and B. Reflect costs developed or incurred no more than 12 months prior to the pre-IRP minimum requirements filing date;	Eversource recommends revising this requirement to call for estimated costs to permit reasonable flexibility in calculating such costs. Eversource also recommends striking the 12-month cutoff for subsection B. Costs for generation technologies can change significantly within a 12-month period. Given the rule seeks a utility’s total costs, it should not

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			impose an artificial time limitation for calculating that amount. Evergy also notes that providing detailed cost information, particularly for proprietary or negotiated fuel supply contracts, may contain commercially sensitive information that will require protective treatment.
Evergy, Inc.	20 CSR 4240-21.020(2)(C)(9)	Considerations for developing alternative resource plans, scenarios, sensitivities, and relevant emerging factors, for stakeholder discussion, as required in paragraph (2)(A)3 consistent with 393.1900.4 RSMo .	This rule's reference to paragraph (2)(A)(3) is unclear, as that paragraph does not exist. Furthermore, "considerations" is ambiguous, as there could be an enormous number of considerations regarding resource plan, scenarios, sensitivities and relevant emerging factors. 393.1900.4 RSMo outlines factors utilities may consider in developing alternative resource plans. Evergy recommends pre-IRP minimum filing requirements align, and should not unreasonably extend beyond, those statutory factors.
Evergy, Inc.	20 CSR 4240-21.020(3)(C)(3)(B); 21.020(3)(C)(3)(C)(III)(b) 21.030(8)(B)(2)	<u>21.020</u> (C)(3)(B) The following for each rate class and for the total of all rate classes : (I) The base-case load forecasts for peak demand and for energy for the planning horizon, with and without utility demand-side resources, and	Evergy reiterates its original comments that requirements concerning the estimated level of average retail rates by class is outside of the purview of an IRP, is more appropriately

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	21.060(1)(C)(2)(D)	<p>(II) A listing of the economic and demographic assumptions associated with the base-case load forecast as specified in 20 CSR 4240-21.030(4);</p> <p>(C)(3)(C)(III)(b) Estimated level of average retail rates by rate class for the first eight (8) years of the plan and the percentage of change from the prior year;</p> <p><u>21.030</u> (8)(B)(2) A comparison of annual rates in each year of the planning horizon for each rate class based upon the most recently proposed class cost of service allocation for the resource plan(s) with and without the load building program;</p> <p><u>21.060</u> (1)(C)(2)(D) Annual customer rate impact, in total and per rate class for the first eight (8) years based upon the electric utility's most recently proposed class cost of service study allocation or allocation method;</p>	<p>addressed in a general rate case, and should be stricken. Also, the details ostensibly in the “level of average retail rates by rate class . . . and the percentage of change from the prior year” are not built into Evergy’s IRP analysis or financial forecasts. Acquiring this data would almost certainly increase costs and add unnecessary complexity. This recommendation applies equally to all other provisions in the draft rules that require consideration of rate classes or rate case issues, as discussed in Evergy’s original comments.</p>
Evergy, Inc.	20 CSR 4240-21.020 (4)(A)-(B)	<p>(4) Cost <u>or Other</u> Updates to the electric utility’s <u>Pending</u> IRP Filing.</p> <p>(A) If the cost estimates the electric utility submitted in the IRP filing have materially changed, <u>or if the electric utility identifies a need to acquire a new or alternative resource (or resources) to serve one or more customers taking service under a tariff developed pursuant to Section 393.130.7 RSMo</u>, an electric utility may submit an update to the IRP filing on or before one hundred fifty (150) calendar days from the submittal date of the IRP filing.</p>	<p>Evergy maintains its original proposal to edit subsection 4 language allowing an electric utility to update an IRP filing if the electric utility identifies a need to acquire new or alternative resources; requiring the update to include sufficient detail of the change, including cost and other impacts; and expanding the requirement to notify the parties if the utility needs to update its IRP Filing if</p>

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		<p>(B) If the electric utility submits a cost<u>any such</u> update to the IRP filing, then the electric utility shall:</p> <ol style="list-style-type: none"> 1. Submit the cost updates in a format with sufficient detail to identify any changes, <u>including</u> cost and an explanation of any other impacts over the planning horizon for costs specified in 20 CSR 4240-21.060 and 20 CSR 4240-21.065(1). 2. Notify the stakeholders no more than ten (10) days after the electric utility identifies that <u>an cost</u> update <u>pursuant to subsection (A)</u> is needed. The electric utility shall convene discussions on the potential for requesting a modified procedural schedule to accommodate the additional review. 	<p>cost estimates have materially changed or if a new or alternative resource needs to be acquired. Evergy continues to believe that the rule should allow updates for other material, non-cost changes and establish a process to request them. Such flexibility is needed to provide a path forward when an electric utility identifies a need to acquire a new or alternative resource or resources to serve one or more customers taking service under a tariff developed pursuant to Section 393.130.7 RSMo.</p>
Evergy, Inc.	20 CSR 4240-21.020(5)(A)(1)	<ol style="list-style-type: none"> 1. File a notification in the IRP docket within thirty-ninety <u>(390)</u> days of the electric utility's determination of such change; 	<p>Evergy is concerned that the proposed 30-day period may be insufficient to prepare and file a revised resource plan when a change in plan is required. While Evergy could reasonably provide a notice within 30 days that its approved plan will change, completing all of the substantive requirements set forth in subsection (B) within that same 30-day window is not feasible. Clarification is needed regarding when the utility is deemed to have determined that its plan must</p>

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			<p>change. If the 30-day period begins when the utility first concludes that its plan must change, and the utility then has only 30 days to assess and satisfy all of the requirements in subsection (B), that timeframe will be inadequate; in that circumstance, the period should be extended (for example, to 90 days) to allow sufficient time to meet all filing obligations. However, if the utility is not considered to have determined that its plan must change until after it has completed the analyses required by subsection (B), a 30-day period could be reasonable for providing the required notice.</p>
Eversource Energy, Inc.	20 CSR 4240-21.020(5)(B)3.	3. The impact of the change on the financial performance measures specified in 20 CSR 4240-21.060(1)(C)3.;	Eversource Energy recommends striking this requirement in subsection (B)(3) and in 21.060(1)(C)(3). The impact of the change on financial performance measures adds no value, as Eversource Energy already provides rating agency reports, credit rates, and metrics in its CCN filings.
Eversource Energy, Inc.	20 CSR 4240-21.025(2)(B)	The electric utility shall align common datasets for use in its transmission system planning, distribution system planning, and generation planning.	Eversource Energy reiterates its original recommendation to strike subsection (2)(B). Practically implementing this is

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			<p>challenging, as datasets are planned at different levels of the system and serve different purposes. Load forecasts used for distribution system planning are evaluated independently at the peak load for each circuit and transformer, which helps identify loading or voltage issues on the distribution equipment. Therefore, the sum of the distribution forecasts totals a peak much higher than the coincident forecast used for generation planning. Additionally, as part of SPP, Evergy participates in a region-wide transmission system planning model build annually and must follow guidelines set forth to ensure consistency among all entities within the region. Accordingly, aligning every assumption in different models would be inefficient, and would likely increase costs.</p>
Evergy, Inc.	20 CSR 4240-21.025(3)	<p>(3)Workpapers. (B) Each electric utility's workpaper shall contain an inputs tab that includes the following information, at a minimum, for each variable utilized in each workbook or model:</p> <p>1.Any assumptions used;</p>	<p>Evergy maintains its original comments that these workbooks requirements are overly prescriptive. In practice, this level of prescription will increase documentation burden and clutter without</p>

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		<p>2. Identification of each variable utilized; 3. Clear definition of the variable; 4. Variable value range; and 5. Citations of source information utilized to develop the variable value range.</p> <p>(C) The electric utility shall provide a process flow diagram that provides graphical representation of the interaction between inputs, modeling software, and results that is produced in support of the IRP filing. The electric utility shall describe and document the process flow diagram so that reviewers understand the logical flow from data through the decision-making process to plan recommendations.</p> <p>(D) The electric utility shall provide a summary workbook that indicates the interaction of linked workpapers provided in support of the IRP filing, including the sources of information utilized for each process and the file location in which the underlying information is provided.</p>	<p>necessarily improving transparency, as utilities may be forced to populate fields mechanically just to satisfy the rule rather than to clarify key modeling choices. Evergy therefore recommends striking this subsection and instead allowing utilities to organize workpapers in a manner that clearly and reasonably explains key inputs, assumptions, and sources, subject to staff and intervenor discovery if additional detail is needed.</p> <p>Furthermore, Evergy is not opposed to summarizing its workpapers. However, sources are already cited in the workbooks. Because sources are already provided, requiring an additional “interaction of linked workpapers” with sources and their location would be overly prescriptive and administratively burdensome, potentially increasing costs. Evergy recommends striking this portion of the requirement.</p>

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Everbly, Inc.	20 CSR 4240-21.025(4)	<p>(4) The electric utility shall provide plot data in electronic format, such as an Excel file. Plots.</p> <p>(A) — The electric utility shall label each plot included in the IRP filing as a stand-alone figure, and shall label the axis with the units of measure.</p> <p>(B) — The electric utility shall provide the data in each plot in tabular form in the workpapers.</p> <p>(C) — The electric utility shall number, reference, and explain all plots and data tables in the text of the technical volumes and the workpapers.</p>	<p>Everbly maintains its original comments that this proposed rule, even with the new redlines, remains overly burdensome. Compliance would require a utility to revisit every workpaper after final numbering of the plots, significantly increasing the Company's administrative burden and costs. Moreover, the level of explanation required for each plot is undefined and it may be impractical to provide data in each plot for complex visualizations. This may increase unnecessary business operations.</p> <p>Everbly is amenable to providing an Excel file with easy-to-follow plot data, rather than providing data for every plot in a document. Everbly is also unclear whether the Commission's filing system can accommodate the level of data detail required here and throughout the proposed rules. Everbly proposes this subsection be revised to require only plot data in electronic format.</p>

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Evergy, Inc.	20 CSR 4240-21.025(5)	<p>(5) Citations within text.</p> <p>(A) The electric utility shall describe and document all scenario and sensitivity assumptions, data inputs, modeling assumptions, modeling files and results, and rationale for inclusion or exclusion to enable stakeholder review, replication, and independent evaluation.</p> <p>(B) For every data point referenced in the IRP filing, the electric utility shall provide a specific citation to the underlying workpaper file name, and tab from which the data was sourced.</p>	<p>Evergy maintains its original comments that this proposed rule remains overly burdensome. Evergy remains unclear what is meant by “[a]ll” scenario and sensitivity assumptions, data inputs, etc. being clearly documented, and the new rule does not appear to clarify. Similarly, Evergy is unclear what is meant by “every data point referenced in the IRP filing,” as that could include countless pieces of data. Compliance would likely drive significant administrative burdens. Evergy recommends striking these requirements.</p>
Evergy, Inc.	20 CSR 4240-21.025(7)	<p>(7) Within two (2) business days of the electric utility submitting the IRP filing, the electric utility shall make available to stakeholders all data, modeling inputs, assumptions, and results for the alternative resource plans pursuant to 20 CSR 4240-21.060(4) and for all risk scenarios and sensitivity analyses pursuant to 20 CSR 4240-21.060(4).</p>	<p>Evergy maintains its original comments that this proposed rule remains overly burdensome. The Company reiterates this rule is unnecessary, as it provides stakeholders with information supporting the filing to parties, either in the filing itself or as data requests. Moreover, requiring the utility provide “all</p>

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			data” remains vague, and the updated rules do not clarify this overly burdensome requirement.
Evergy, Inc.	20 CSR 4240-21.025(8)	(8) The electric utility shall provide staff and public counsel reasonable access to modeling software, tools, standards, formatting and data files the electric utility used for the purpose of verifying results or performing independent modeling runs, as the commission designated in conformance with section 393.1900.1(5) RSMo. The electric utility shall bear all costs of compliance for this section.	<p>Evergy maintains its opposition to this requirement that this proposed rule remains overly burdensome. This requirement extends well beyond the scope of Section 393.1900 RSMo, as nothing in the statute requires the utility provide such access to proprietary modeling software to parties, much less bear all costs with providing such access. Furthermore, nothing in Section 393.1900 RSMo requires Staff or OPC to create their own resource plans for purposes of evaluating a utility’s proposed plan.</p> <p>Furthermore, the updated draft rule fails to address the concern that access to modeling software and data sets could potentially breach licensing agreements which restrict the license to Evergy, its affiliates, and third-party providers. The proposed rule would force the Company to potentially violate licensing agreements. Additionally, it is</p>

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			<p>unclear whether Staff and OPC meet necessary cybersecurity and IT standards for access to the utilities systems. To the extent it would not violate licensing agreements, Evergy can share data used in the modeling, but cannot grant Staff and OPC access to or use of its modeling software.</p>
Evergy, Inc.	20 CSR 4240-21.030(1)(B)	<p>The electric utility shall maintain and annually update a comprehensive database of historical energy usage and demand across its service territory covering at least the most recent five (5) years for hourly data and twenty (20) years for monthly data preceding the filing year approved by the commission. The database shall include all the customer classes and service voltages and capture hourly, daily, and monthly energy consumption, customer counts, monthly peak demand levels (coincident and non-coincident peaks by customer class), and annual peak demand (reported separately for summer and winter for both coincident and non-coincident peaks by customer class) <u>attribute and energy consumption information necessary to meet the requirements in 20 CSR 4240-21.030(2)-(4).</u></p>	<p>Evergy is unclear on the rule's requirement to annually update a compressive database. Given resource plan filings are provided quadrennial, further clarification is needed to give utilities clear, objective guidance on what annual updates are required and whether such updates must be maintained internally at the utilities or filed with the Commission.</p> <p>Evergy understands, based on the technical session discussion with Staff, that paragraph (1)(B) is intended to refer only to the voltage-related data needed for losses, and Evergy's original redline reflected that understanding. Nothing in the updated rule indicates that this</p>

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			understanding of Staff’s intent is incorrect. Accordingly, Evergy maintains its original recommendation.
Evergy, Inc.	20 CSR 4240-21.030(2)(I)	(I) The electric utility shall describe and document how the model incorporates weather variables, and captures the sensitivity of load to key weather variables such as temperature, and degree days.	This rule’s requirement that the utility explain the sensitivity of load to weather variables remains overly prescriptive. Section 393.1900 RSMo, simply requires “forecasts of the electrical corporation’s sales by hour under reasonable scenarios,” which does not compel granular, variable-by-variable weather sensitivity analysis. Evergy maintains that the rule should not exceed the statute’s level of specificity and should not impose prescriptive requirements regarding the sensitivity of load to particular weather variables.
Evergy, Inc.	20 CSR 4240-21.030(2)(K)1.	1.The electric utility shall validate the forecast results through benchmarking against historical load patterns and against any available independent forecasts published by regional transmission organizations, government agencies, or other credible sources;	Evergy maintains its original recommendation to strike the overly prescriptive requirements requiring the utility to validate its forecast results through benchmarking. The Company’s forecasts can be validated by stakeholders without these requirements being embodied in the rules.

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			Moreover, the phrase “any available independent forecasts published by...other credible sources” is essentially unbounded. This is an open-ended research obligation that could consume significant analytical resources and generate disputes about which sources the utility failed to consider.
Eversource, Inc.	20 CSR 4240-21. 030 (7)(D)6.	6. — Describe and document how the forecast incorporates weather variables and other variables that impact load, including normal conditions, extreme events, and identify the statistical methods employed to normalize historical loads, and the sensitivity of load to key weather variables such as temperature, humidity, and degree-days.	Consistent with its above comment concerning weather variability requirements, Eversource recommends striking this requirement. Section 393.1900 RSMo does not compel granular descriptions of weather variables in forecasting. The rule should not exceed the statute’s level of specificity and should not impose overly prescriptive requirements.
Eversource, Inc.	20 CSR 4240-21. 030 (9)(A)(1).	1. The electric utility shall <u>describe and document its analysis of the sensitivity of the dependent variables of the base-case forecast to variations in the independent variables identified in subsection 4 CSR 4240-21.030(2)(3).</u> quantify the sensitivity of its base-case load forecast to changes in key independent variables, including, but not limited to, economic growth, electricity prices, customer adoption of new technologies, energy efficiency improvements, and electrification of end uses. For each sensitivity, the	Given the new rule does not appear to meaningfully differ from the initial draft, Eversource reiterates its original comments. The rule, even as amended, exceeds requirements of Section 393.1900. Eversource also reiterates that elasticities for end-use adoption and

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		<p>electric utility shall isolate the impact of a single driver, with results expressed as percentage changes in non-coincident peak and energy consumption relative to the base case load forecast.</p>	<p>efficiency are not consistent with the Statistically Adjusted End-use framework because it employs structured variables that are a build-up of both saturation and efficiency of end-use estimates. An estimation equation with load as an output and all individual end-use saturation and end-use efficiency as independent variables would suffer from a high degree of multi-collinearity, making elasticity results unreliable.</p>
Energys, Inc.	20 CSR 4240-21. 030 (9)(B)	<p>(B) — For each scenario, the electric utility shall provide a load forecast for each of the distribution substations affected by the overall load growth. The electric utility shall describe and document the methodology used to forecast the distribution substation load, and should include a discussion of historical load growth within the geographical area served by each distribution substation, as well as any known changes, such as customer additions, in the geographic area served by each distribution substation.</p>	<p>Energys maintains its original recommendation to strike this paragraph. Providing this level of detail for distribution substation load, including historical load growth and known changes, would be overly burdensome and falls outside of energy forecasting. Also, such details are not required by Section 393.1900 RSMo. For purposes of generation resource planning, supply side and demand side, distribution substation load is not used in that process. The distribution load is non-coincident and serves to evaluate the ability of the</p>

Stakeholder	Rule Citation	Requested Change	Summary of Comment
			distribution assets to serve the local load. In aggregate, peak loads for distribution substations would be much higher than the total company coincident load for which resource planning is performed.
Eversource, Inc.	20 CSR 4240-21.035 (2)(C)(3).	<p>3. A listing of identify potential environmental legal mandates which may be imposed at some point within the planning horizon, including:</p> <p>A. The probable environmental compliance costs of each potential supply-side resource option, which shall be quantified by estimating the cost to the electric utility to comply with such environmental legal mandates that may be imposed;</p> <p>B. A list of environmental pollutants for which, in the judgment of the electric utility decision-makers, legal mandates may be imposed during the planning horizon which would result in compliance costs that could significantly impact electric utility rates;</p> <p>C. A subjective probability that represents electric utility decision-maker's judgment of the likelihood that legal mandates requiring additional levels of mitigation will be imposed at some point within the planning horizon; and</p>	Eversource reiterates its recommendations regarding the requirements that the utility identify and structure analyses around “potential” environmental legal mandates. Laws and regulations often change materially during the drafting process, and attempting to calculate compliance costs for a draft law is inherently speculative; in many cases, no reasonable cost estimate can be developed when a law or rule is undergoing multiple revisions at the same time the utility is preparing its IRP filing. Eversource recommends striking language requiring analysis of the impacts based on speculative future laws. Eversource would not oppose a requirement that an IRP filing include a narrative

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		D. The electric utility's expected mitigation cost, based on these probabilities, for each identified pollutant.	discussion on potential future laws, rather than basing resource plan analysis on potential legal mandates.
Evergy, Inc.	20 CSR 4240-21.040(1)(A)	(1) Transmission Analysis Requirements. (A) The electric utility shall describe and document the adequacy of its existing transmission system including: 1. Age, condition, and efficiency level of its existing transmission system; and 2. All known transmission constraints due to real power, reactive power, and power quality under current peak demand.	<p>Evergy maintains its opposition to these Transmission Analysis Requirements under subsection (A) and recommends striking them. Requiring the Company to describe and document the adequacy of its existing transmission and distribution systems as this would be unduly burdensome and is vague. The transmission and distribution system comprises hundreds of thousands of assets at different agencies and conditions. Evergy also remains unclear what is meant by "efficiency level" in this context or what is meant by "transmission constraints" or "distribution constraints" and the updated draft rules do not provide clarification.</p> <p>Additionally, these requirements are not required by Section 393.1900 RSMo. The statute requires a utility to analyze potential new</p>

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			transmission and distribution options and costs associated with transmission or distribution infrastructure required to integrate proposed investments into the system. But these requirements can be met without the burdensome regulatory requirements of this proposed rule.
Evergy, Inc.	20 CSR 4240-21.040(1)(E)-(G)	<p>(E) The electric utility shall estimate the portion and amount of costs and revenues of proposed regional transmission upgrades that would be allocated to the electric utility over the implementation period.</p> <p>(F) The electric utility shall estimate the amount of revenue requirement of regional transmission assets that would be allocated based on load to the electric utility.</p> <p>(G) The electric utility shall provide a report for consideration pursuant to 20-CSR-4240-21.035(1)(D) that identifies the physical transmission upgrades needed to interconnect generation, facilitate power purchases and sales, and otherwise maintain a viable, reliable, and/or resilient transmission network, including:</p> <p>1. A list of the transmission upgrades needed to physically interconnect a generation source within the appropriate RTO/ISO footprint;</p> <p>2. A list of the transmission upgrades needed to enhance deliverability from a point of delivery within the appropriate RTO/ISO including requirements for firm transmission service from the point of delivery to the electric utility's load and requirements for financial</p>	<p>Evergy maintains its original recommendations to strike the Transmission Analysis Requirements reflected in subsections (E) through (G). Evergy reiterates that it is unclear whether the Company can estimate revenues of transmission upgrades as required by subsection (E).</p> <p>Subsection (F)'s requirement to estimate the amount of revenue requirement of regional assets is outside the scope of resources planning and is more appropriate for consideration in a rate case.</p> <p>Regarding the overly prescriptive requirements of subsection (G), all these costs would be identified by SPP through their Generation</p>

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		<p>transmission rights from a point of delivery within the appropriate RTO/ISO to the electric utility's load; 3. A list of transmission upgrades needed to physically interconnect a generation source located outside the appropriate RTO/ISO footprint; 4. A list of the transmission upgrades needed to enhance deliverability from a generator located outside the appropriate RTO/ISO footprint, including requirements for firm transmission service to a point of delivery within the appropriate RTO/ISO footprint and requirements for financial transmission rights to a point of delivery within the appropriate RTO/ISO footprint; 5. The estimated total cost of each transmission upgrade; and 6. The estimated fraction of the total cost and amount of each transmission upgrade allocated to the electric utility.</p>	<p>Interconnection process and would be heavily reliant upon the specific location of the resource.</p>
Evergy, Inc.	20 CSR 4240-21.040(2)(A)	<p>(A) The electric utility shall describe and document the adequacy of its existing distribution system including: 1. Age, condition, and efficiency level of its existing distribution system; and 2. All known distribution constraints, including constraints due to real power, reactive power, and power quality, under current peak demand; and 3. All known distribution constraints, including constraints due to real power, reactive power, and power quality, under reasonably anticipated additions to peak demand.</p>	<p>Evergy maintains its original recommendation to strike these requirements. The Company does not maintain "all known" real power, reactive power, and power quality constraints under both current and future peak demand. As Evergy does not track information in this form, creating and maintaining such a dataset solely for this rule would be resource-intensive. Further, these requirements do not impact generation development activities.</p>

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Evergy, Inc.	20 CSR 4240-21.040(3)	<p>(3) Advanced transmission and distribution network technologies.</p> <p>(A) The electric utility shall assess advanced transmission and distribution technologies that may become available during the planning horizon and facilitate or expand the availability and cost effectiveness of demand-side resources or supply-side resources.</p> <p>(B) The cost benefit analysis of advanced transmission and distribution technologies shall be separately identifiable in the analyses required in section (1) and section (2) and include:</p> <p>1. A description of the electric utility's efforts at incorporating advanced grid technologies into its transmission and distribution networks; and</p> <p>2. A description of the impact of the implementation of transmission and distribution advanced grid technologies on the selection of a resource acquisition strategy.</p>	<p>Evergy recommends striking this subsection concerning cost benefit analysis of advanced transmission and distribution technologies. Existing regulations, including 20 CSR 4240-22.045, already address a utility's evaluation of such technologies and should not be duplicated or expanded here. Any requirement to assess advanced technologies should remain consistent with the analytical framework set forth in existing regulations.</p>
Evergy, Inc.	20 CSR 4240-21.040(4)	<p>(4) The electric utility shall develop, describe and document an avoided transmission capacity cost and an avoided distribution capacity cost based upon investments in transmission assets or distribution assets that can be reasonably avoided due to implementation of demand-side management programs. Such analysis must provide time periods identified as well as magnitudes necessary to avoid or minimize necessary transmission and distribution system upgrades. The avoided transmission and distribution capacity costs are components of the avoided demand cost pursuant to 20 CSR 4240-21.050(1)(A)2.</p>	<p>Evergy maintains its original recommendation to strike this subsection, as it is overly burdensome. Evergy plans infrastructure investments based on historical load, expected load growth, and incorporated demand-side management programs. Carving out DMS impacts to quantify avoided costs is overly burdensome.</p>

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Evergy, Inc.	20 CSR 4240-21-050(1)(A)	<p>(A) In order to properly optimize the amount of demand-side resources, the electric utility shall designate all Missouri jurisdictional demand-side resources as candidate resource options in its capacity expansion model on the basis of estimated seasonal energy, seasonal demand savings and expected program costs.</p> <p>1. For purposes of calculating avoided cost, the electric utility shall compare the capacity expansion model of its preferred resource model with the same model excluding all demand-side resources as resource options in the first four (4) years <u>the utility avoided demand cost shall include the capacity cost of generation, transmission, and distribution facilities, adjusted to reflect reliability reserve margins and capacity losses on the transmission and distribution systems, or the corresponding market-based equivalents of those costs. The utility shall describe and document how it developed its avoided demand cost.</u></p> <p>2. The electric utility's avoided demand cost calculation shall identify specific generation, transmission, or distribution investments that can be reduced, deferred, or avoided as a result of demand-side program implementation. The utility avoided energy cost shall include the fuel costs, emission allowance costs, and other variable operation and maintenance costs of generation facilities, adjusted to reflect energy losses on the</p>	<p>Evergy reiterates its original recommendation to replace the avoided-cost language in subsection (1)(A) with language in the current IRP rules, namely 20 CSR 4240-22.050(5)(A)1. & 2. The proposed avoided-cost methodology does not reflect how avoided costs are actually used in the integrated resource planning process. Avoided costs are not an output of IRP modeling; rather, they are an input estimate used to screen DSM measures and programs for potential inclusion in a DSM portfolio and are needed approximately 12 months before the IRP process even begins. A model-based approach does not produce this until the end of the IRP process. Furthermore, the proposed requirement to restrict the analysis to “the first four years” would artificially drive avoided cost to zero. DSM delivers value over the full planning horizon. DSM portfolios ramp gradually and provide cumulative benefits over 15–20 years. Restricting</p>

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		<p><u>transmission and distribution systems, or the corresponding market-based equivalents of those costs. The utility shall describe and document how it developed its avoided energy cost.</u></p>	<p>avoided cost to early years understates that value.</p> <p>Moreover, the proposed requirement that the utility identify specific generation, transmission, or distribution investments that can be reduced, deferred, or avoided is not compatible with how DSM portfolios function in practice. DSM resources are typically deployed incrementally over time, often building gradually over a 15- to 20-year period, and therefore do not lend themselves to identification with a discrete supply-side asset coming online at a specific moment. Moreover, because the assumptions and inputs in each IRP change from one filing to the next, the type and timing of hypothetical supply-side resources also change, making any such identification highly variable and creating a level of precision that does not meaningfully exist.</p>
	20 CSR 4240-21-050(1)(C)	<p>(C) For determining the optimal amount of demand-side resources, the electric utility shall exclude distributed energy resources that are</p>	<p>Evergy also reiterates its original recommendation to strike the requirement to</p>

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		<p>included in the 20-CSR-4240-21.055 analysis as a demand-side resource.</p>	<p>exclude distributed energy resources (“DERs”) as demand-side resources. This provision is inconsistent with the statutory definition of “demand-side program” in Section 393.1075, RSMo. The statute expressly includes any program conducted by the utility to modify net consumption of electricity on the retail customer’s side of the meter, including but not limited to energy efficiency, load management, demand response, and interruptible or curtailable load. By definition, DER, particularly behind-the-meter technologies such as energy storage, solar, and electric vehicles, can and do modify net customer consumption and serve as load management tools.</p>
	<p>20 CSR 4240-21-050(1)(D)</p>	<p>(D) The electric utility shall describe and document the electric utility’s assumptions concerning the change in baseline conditions, due to the adoption of energy efficiency measures by customers or consumers outside of any utility-sponsored programs, new housing and commercial building starts, appliance saturations, employment growth, federal standards, building codes, and other relevant factors. The electric utility shall provide an estimate of all changes in</p>	<p>Evergy also reiterates its original recommendation to strike the requirement to describe and document assumptions concerning changes in baseline conditions. Changes in baseline conditions driven by customers or consumers outside of utility-sponsored programs do</p>

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		<p>peak consumption and energy consumption, separately, due to the factors above by calendar month consistent with 20 CSR 4240-21.030 and the assumed program costs in each year of the planning horizon for each potential demand-side program.</p>	<p>not relate to the evaluation or design of demand-side programs. Rather, they relate to the development of the underlying load forecast. The proposed requirement introduces load-forecasting concepts into a section intended to govern utility-sponsored demand-side resources. To the extent the Commission intends for such factors to be captured in the development of baseline load assumptions, that work is more appropriately addressed within the load forecasting framework. Including this language in the demand-side resource section creates confusion about scope, risks duplicative analysis, and blurs the distinction between baseline load development and evaluation of utility-sponsored demand-side programs.</p>
Evergy, Inc.	20 CSR 4240-21.050(3)(A)	<p>(A)The electric utility shall conduct, describe, and document market research studies, customer surveys, test marketing programs, and other activities as necessary to estimate the maximum achievable potential, technical potential, and realistic achievable potential of each demand-side resource option.</p>	<p>Evergy recommends striking the references to “maximum achievable potential,” “technical potential,” and “realistic achievable potential” in this requirement, as specifying particular potential metrics is unnecessary to</p>

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			support reasonable estimation and evaluation of demand-side resource options. Instead, the rule should simply require the utility to conduct and document appropriate research and analysis to estimate demand-side resource options, without prescribing specific potential frameworks.
Eversource, Inc.	20 CSR 4240-21.050(3)(C)(7)	7. An estimate of the rate impacts to each customer class, and separately for program participants and non-participants in each customer class, by year that includes and identifies an assumption of the timing of the electric utility's general rate cases, inclusion of any electric utility's proposed earnings opportunity, and Demand-Side Investment Mechanism rate cases. The identified earnings opportunity shall be based on specific investments that can be reduced, deferred, or avoided as a result of demand-side program implementation.	Eversource maintains its original recommendation to strike the requirement to provide an estimate of rate impacts by customer class. IRP models do not have the granularity necessary to calculate program-level costs and benefits by customer class or by participation status, and such analyses are more appropriately addressed in a general rate case. 393.1900.4 RSMo requires the Commission balance rate impacts generally in its report and order on a utility's IRP. Eversource's proposal to require an estimate of only the rate impacts by year better aligns the proposed rule with the statute.

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Evergy, Inc.	20 CSR 4240-21.055(1)	<p>(1) Distributed Energy Resources (DER) Database.</p> <p>(A) The electric utility shall create, and update annually, a database of information on DER for purposes of evaluating current penetration and planning for future changes in the levels of DER.</p> <p>1. The electric utility shall maintain the following information in the database:</p> <p>A. Existing DER and DER aggregations interconnected to the electric utility's distribution system regardless of ownership;</p> <p>B. Information characterizing the location according to Geographic Information System coordinates on the distribution circuits where DER are connected;</p> <p>C. Aggregated capacity of DER for each circuit and annual peak load of each circuit;</p> <p>D. Relevant interconnection standard and standby service requirements, as applicable, that specify DER performance capabilities; and</p> <p>E. Summaries of the electric utility's past DER Adoption Potential Studies performed to comply with section (2) and the DER planning process evaluation under section (3).</p> <p>(B) To the extent that the electric utility is not in possession of all of the information required, the electric utility shall state which information it does not possess, the reason the information is not possessed, and how the electric utility plans to obtain the information for future IRP filings.</p>	<p>Evergy maintains its original recommendation to strike these requirements concerning DER database standards. The proposed rule remains overly burdensome. Evergy still estimates that the time to implement this database in the initial year would take 160 engineering hours, and that each following year, it would take 60 engineering hours to process and validate updates. Additionally, regarding subsection (1)(A)(1)(B), it is unclear what GIS points would need to be included. Currently, Evergy records have GIS coordinates based off a customer address, and not necessarily where the meter or DER asset is located.</p>
Evergy, Inc.	20 CSR 4240-21.055(3)	<p>(3) Evaluating DERs as part of the IRP Filing.</p> <p>(A) If not fully covered by the electric utility's DER Adoption Potential Study, the</p>	<p>Evergy reiterates its original recommendation to strike these requirements concerning a DER evaluation and a DER</p>

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		<p>electric utility shall include in the IRP filing the methodologies used to develop low, medium, and high DER penetration scenarios separately for DERs the electric utility sponsors and those that are non-electric utility sponsored, including:</p> <ol style="list-style-type: none"> 1. Subjective probabilities; 2. Adoption rates; 3. Geographic deployment assumptions; 4. DER and DER aggregation load profiles; and 5. Any other relevant assumptions factored into the DER penetration scenario. <p>(B) The electric utility shall describe and document the evaluation of the DER penetration scenarios developed in subsection (3)(A) and integration of DER and DER aggregations onto the electric utility's distribution system.</p> <p>(C) The electric utility's evaluation shall consider system reliability, beneficial modification of customer energy consumption, potential need for additional distribution assets, and changes to supply-side resources additions.</p> <p>(D) The electric utility shall provide an estimate of the reduction or increase in transmission and distribution line losses as a result of DER deployment. The electric utility may focus its analysis on portions of its transmission and distribution systems based on factors including, but not limited to, the need for location-specific upgrades.</p> <p>(E) The electric utility shall provide a cost benefit analysis of deployment of DER or DER aggregations as an alternative to traditional resources.</p>	<p>potential study. Evaluating DERs as part of the IRP Filing, would be overly burdensome. Evergy lacks a DER adoption model. Developing one would cost approximately \$300,000 to \$400,000 and would need to be coordinated with the DSM potential study to prevent double-counting and ensure the assumptions are aligned.</p>
Evergy, Inc.	20 CSR 4240-21.060(1)(C)(3).	3. Current and forecasted annual financial or other credit metrics, not necessarily based on the electric utility's financial plan, that assess the electric utility's	Evergy maintains its original recommendation to strike the prescriptive requirements in

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		<p>ability to finance and sustain the implementation of an alternative resource plan, including but not limited to:</p> <ul style="list-style-type: none"> A. Total debt to capital ratio; B. Funds From Operations (FFO) to Debt ratio; C. Debt to Earnings Before Interest, Taxes, Depreciation, and Amortization (EBITDA) ratio; and D. Any other credit metric indicative of the electric utility's ability to finance an alternative resource plan. 	<p>subparagraphs (A)-(D). Evergy expects meeting these requirements, even though the updated proposed rules struck many of the prior requirements, to be time-consuming and expensive. Evergy does not currently have a full financial model with the IRP. Notably, if the model cannot be built in Excel, Evergy would need to purchase necessary software, further increasing costs. Furthermore, these proposed requirements do not appear to be required by Section 393.1900 RSMo. Rather 393.1900 RSMo reserves inquiry into financial and credit metrics to the limited CCN inquiry. Additionally, the Commission already receives notice of current credit ratings, thus calculating these metrics with these specific requirements would be duplicative and of little value.</p>
Evergy, Inc.	20 CSR 4240-21.060 (2)(B)(6).	6. Potential future changes in legal mandates;	Consistent with Evergy's prior comments, the Company maintains its original recommendation to strike requirements for analyzing "potential" future legal mandates, as such

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			requirements are highly speculative.
Evergy, Inc.	20 CSR 4240-21.060 (5)(D)(2)(D)	(D) Reasonable rate case timing to evaluate the effect of early, delayed, or staggered cost recovery on forecasted revenue requirements and customer rate trajectories, where the results shall demonstrate how timing assumptions influence affordability and plan selection;	Evergy recommends striking this rate case timing requirement, consistent with its original comments. The rate making outcomes are not relevant to determining which plan has the lowest cost, or risk analysis, but only tells how the cost is recovered, which is addressed in a different process. Rate case timing is solely a management decision, and many factors can cause the timing of a particular rate case to be filed faster, slower or not at all.
Evergy, Inc.	20 CSR 4240-21.060 (5)(F)-(H)	(F) The electric utility shall conduct LOLE and EUE studies for year (5) of the planning horizon for each alternative resource plan that has undergone risk analysis. <u>Alternatively:</u> (F) The electric utility shall conduct LOLE and EUE studies for year (5) of the planning horizon for each <u>three (3)</u> alternative resource plans that have <u>yes</u> undergone risk analysis. (G) The electric utility shall provide an updated table for each alternative resource plan that has undergone risk analysis, summarizing each alternative resource	Evergy recommends striking, or at least rewording, part (F), as resource planning already considers SPP reserve margin requirements, which are built on LOLE and EUE studies. Requiring Evergy to conduct similar studies for every alternative plan would be resource-intensive and inefficient as these models take drastically longer to run than capacity expansion/production cost models.

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		<p>plan's annual performance measures over the planning horizon, as set forth in section (1).</p> <p>(H) After the risk analysis is completed, the electric utility shall identify the top four (4) alternative resource plans that the electric utility assesses best balance of the balancing factors.</p>	<p>Alternative language could limit LOLE and EUE analysis to a subset of representative portfolios (approximately 3 alternative plans); allow flexibility of evaluation criteria to identify the most relevant portfolios to study that reflect significant material differences in resource mix, cost, or reliability characteristics; and tie LOLE and EUE studies to the alternative plans selected in part (H).</p>
Eversource, Inc.	20 CSR 4240-21.060 (6)(C)(3).	<p>3. The electric utility shall clearly identify tradeoffs among performance measures and explain how the preferred resource plan balances the balancing factors.</p>	<p>Eversource maintains its original comment that this requirement is overly prescriptive, burdensome, and not necessary to evaluate the preferred resource plan. In addition, the directive to "clearly identify tradeoffs" is inherently subjective and provides no meaningful standard for what level of detail or format would satisfy the rule, creating compliance uncertainty.</p>
Eversource, Inc.	20 CSR 4240-21.060 (6)(E)	<p>6. Include financial performance measures specified in paragraph (1)(C)3. annually through year ten (10) of the planning horizon.</p>	<p>Eversource recommends striking the new requirement that a utility evaluation scorecard consider financial performance ratios, as these proposed</p>

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			requirements are not required by Section 393.1900 RSMo.
Everygy, Inc.	20 CSR 4240-21.060 (6)(F)-(G)	<p>(F) — The electric utility shall quantify the forecasted rate impacts of the top four (4) alternative resource plans, based on the scorecard required in subsection (5)(E), including the preferred resource plan, over the planning horizon.</p> <p>1. — Annual rate impact estimates, specified in subparagraph (1)(C)2.D., shall include:</p> <p>A. — Base rates and fuel cost components;</p> <p>B. — Anticipated changes in revenue requirements;</p> <p>C. — Estimated annual percentage change in rates by class based upon the electric utility’s most recently proposed class cost of service allocation factors;</p> <p>D. — Reasonable rate case timing scenarios; and</p> <p>E. — Inclusion of regulatory treatments of cost that the electric utility intends to request.</p> <p>(G) The electric utility shall discuss the modeled impacts of rate changes on future electric loads and the derivation of elasticity assumptions.</p>	Everygy maintains its original recommendation to revise these requirements regarding annual rate impacts of the alternative resource plans. Everygy recommends removing the prescriptive requirements in (F) and (G). Generating these detailed analyses of rate impacts by customer class will increase the burden on the Company by requiring another full financial model and is outside the purview of a resource plan and will increase costs to customers.
Everygy, Inc.	20 CSR 4240-21.065	20 CSR 4240-21.065 Implementation Plan Development and Reporting Requirements	Everygy provides the following general comments on Section 21.065: Section 21.065 requires the submission of extensive information regarding supply-side resources, including, among other things, engineering and construction phase schedules, detailed cost estimates for those phases, and identification of major milestones. As noted below,

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			<p>the requirement to identify “major” milestones is inherently subjective and does not provide utilities with a clear, objective standard for compliance.</p> <p>Additionally, the level of detail required effectively presumes that a resource is fully developed or under contract. By requiring site-specific characteristics and granular development information, this section exceeds statutory requirements for identifying a preferred plan to provide safe and adequate service at just and reasonable rates.</p> <p>Further, Section 21.065 goes beyond using the types of generation technologies proposed for generation facilities and results from a request for information or proposals to provide any new supply-side resources needed.</p>
Evergy, Inc.	20 CSR 4240-21.065(1)(C)(3)	3. Identification of critical paths and major milestones, including decision points for committing to major expenditures;	Evergy recommends striking this requirement because it is vague and lacks clear, objective guidance regarding what constitutes “major” milestones or expenditures.

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			Without defined criteria, the provision imposes no meaningful standard on utilities while exposing them to after-the-fact criticism from stakeholders based on subjective interpretations.
Everbay, Inc.	General	Various corrections to rule numbering	Everbay notes that the various redlines to the proposed rules appear to have disrupted the numbering throughout. Once the proposed rules are finalized, Staff will need to ensure that all numbering is accurate.