



Evergy Missouri Metro
Case Name: 2026 Evergy MO Metro Rate Case
Case Number: ER-2026-0143

Requestor Marke Geoff -
Response Provided May 05, 2026

Question:2019

Refer to Ryan Mulvaney Direct Testimony, and to the statement at 12:16 “EMM’s asset management strategy is to minimize or prevent customer outages by identifying high-impact assets that can be maintained or replaced prior to failure.”

- a. Explain how the Company determines whether maintenance or replacement is more appropriate for an item of equipment that has been scored, and provide any published guidelines provided to employees.
- b. Provide the capital dollar amount spent by year on proactive equipment program projects and replacements from 2016 through 2025.
- c. Refer to the response to subpart (b). Explain how the Company establishes the proactive equipment program projects and replacements capital budget each year.
- d. Provide the O&M dollar amount spent by year on proactive equipment program repairs from 2016 through 2025.
- e. Refer to the response to subpart (d). Explain how the Company establishes the proactive equipment repair O&M budget each year.
- f. Confirm that assets that have passed objective diagnostic or functional test results are being replaced through the Company’s proactive project and equipment replacement programs. If this cannot be confirmed, please explain.
- g. Please explain why the Company uses scoring, rather than directly observable diagnostic or functional test results, to determine when assets should be replaced. Provide any analyses indicating that the Company’s scoring mechanisms more accurately identify assets prone to failure than objective diagnostic or functional test results. If no such analyses have been completed, please explain why not.
- h. Refer to the response to subparts (f) and (g) above. Provide any analyses, such as benefit-cost analyses, indicating that the value of reliability improvements delivered to customers by the proactive project and equipment replacement program exceeds the incremental costs of the program to customers. If no such analyses have been completed, please explain why not.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:



Objection

The Company objects to the Data Requests as vague, overly broad, unduly burdensome, ambiguous, calls for speculation, not reasonably calculated to lead to the discovery of admissible evidence, and not relevant or material to the subject matter of this proceeding. The Company will not provide responses to Data Requests that ask for estimates, analyses, or calculations that have not been performed by the Company. Additionally, the Company will not provide responses to Data Requests that seek documents or document formats not created or maintained in the Company's ordinary course of business.

The Company objects to these requests to the extent they seek information back to 2016. The Company has not yet been able to verify whether complete and reliable data exist for the full requested period. Given that Evergy Missouri Metro's last Missouri rate case was filed in January 2022, the Company submits that 2022 forward is a more reasonable and proportional time period for these requests. Subject to and without waiving these objections, the Company will respond to the extent responsive information is available for the period beginning January 1, 2022.

- a. The Company determines whether maintenance or replacement is appropriate based on asset health scores, condition assessments, and operational risk. Maintenance is selected when issues can be addressed cost-effectively; replacement is considered when risk, degradation, or cost warrants. There are no formally published guidelines; decisions are made through engineering review and budget prioritization.
- b. For distribution proactive equipment programs see DR responses 2024, 2025, 2026, 2027, 2028, 2029, 2030, and 2031 for capital dollar spent by year.
- c. For distribution proactive equipment programs see DR responses 2024, 2025, 2026, 2027, 2028, 2029, 2030, and 2031 for how the Company establishes the capital budget each year. For substation assets, capital budgets are developed collaboratively by Engineering, Operations, and Finance. Projects are identified based on asset condition, reliability risk, and known operational issues, with funding approved through the Company's capital governance process.
- d. For distribution proactive equipment programs see DR responses 2024, 2025, 2026, 2027, 2028, 2029, 2030, and 2031 for O&M dollars reported under the funding projects spent by year. For substation assets, Operations and Maintenance (O&M) expenditures are not tracked or reported in a manner that isolates proactive equipment repair spending across all asset types for the period 2022 through 2025.
- e. The Company does not have a specific O&M budget for proactive equipment repairs. These O&M costs are included in the overall O&M spend for the departments where the repairs were made. For substation assets, O&M spending supports preventive, compliance, and reactive work. Proactive repairs are identified on an as-needed basis and addressed within the annual O&M budget based on operational priorities and available funding.



- f. For distribution equipment, there are assets that have passed objective diagnostic or functional tests that are being replaced through the lateral improvement program and Feeder improvement program. Both programs occasionally require the replacement of poles, that have passed their most recent inspection, to transition pole heights with poles being replaced as part of these programs/projects. For substation assets, the Company cannot confirm that assets which have passed objective diagnostic or functional testing are being replaced through proactive programs. Assets that pass testing are generally not replaced unless other condition indicators or risk factors justify replacement.
- g. Scores are used for programs that replace a group of assets where as individual diagnostic tests or inspections are used to identify individual assets that have reached the end of their useful life and therefore require replacement. For distribution programs there are two programs that use AssetLens to identify work that has a score. Those programs are the lateral improvement program and the feeder improvement program. These programs use the score to identify portions of the electrical grid where a group of assets can be replaced to improve reliability in that area. The score helps prioritize where capital dollars are used for the greatest estimated benefit of our customers. The pole, proactive cable replacement/rehabilitation, manhole vault top replacement, and network rehabilitation programs utilize directly observable diagnostic or function test results to determine if the tested asset should be replaced. The worst performing circuit program is based on regulatory requirements and does not use a score. Likewise, the customers experiencing multiple interruptions (CEMI) improvement program focuses on customer experiencing six or more interruptions over a 12-month period with no additional score used. No analyses of the scoring mechanisms have been completed as they are used independently based on the program selected. For substation assets, the Company uses asset health scoring to consistently prioritize risk across diverse asset types. Diagnostic and functional test results are considered but represent point-in-time data and do not always predict long-term failure risk. No formal analysis comparing scoring to test-only approaches has been performed.
- h. For distribution proactive equipment programs see DR responses 2024, 2025, 2026, 2027, 2028, 2029, 2030, and 2031 for specifics regarding the value of reliability improvements delivered versus costs of program spending. For substation assets, the Company has not performed a formal benefit-cost analysis quantifying reliability benefits relative to incremental customer costs for the proactive equipment replacement program.

Information provided by: Jennifer Foster, Jesse Whipple

Attachment(s):



Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs