

Exhibit No.:  
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Witness: Cody VandeVelde  
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Sponsoring Party: Evergy Missouri Metro and Evergy Missouri  
West  
Case No.: EO-2026-0345  
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**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NOS.: EO-2026-0345**

**DIRECT TESTIMONY**

**OF**

**CODY VANDEVELDE**

**ON BEHALF OF**

**EVERGY MISSOURI METRO and  
EVERGY MISSOURI WEST**

**Kansas City, Missouri  
August 2026**

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**DIRECT TESTIMONY**

**OF**

**CODY VANDEVELDE**

**CASE NO. EO-2026-0345**

**I. INTRODUCTION**

**Q: Please state your name and business address.**

A: My name is Cody VandeVelde. My business address is 818 S. Kansas Avenue,  
Topeka, Kansas.

**Q: By whom and in what capacity are you employed?**

A: I am employed by Evergy Kansas Central, Inc. and serve as Senior Director,  
Strategy and Long-Term Planning - Energy Resource Management for Evergy  
Metro, Inc. (“Evergy Metro”) d/b/a as Evergy Missouri Metro (“Evergy Missouri  
Metro” or “EMM”), Evergy Missouri West, Inc. d/b/a Evergy Missouri West  
 (“Evergy Missouri West” or “EMW”) (together, “Applicants” or “Evergy”),  
Evergy Metro, Inc. d/b/a Evergy Kansas Metro (“Evergy Kansas Metro”), and  
Evergy Kansas Central, Inc. and Evergy Kansas South, Inc., collectively d/b/a as  
Evergy Kansas Central (“Evergy Kansas Central”). These are the operating utilities  
of Evergy, Inc. (“Evergy”).

**Q: Who are you testifying for?**

A: I am testifying on behalf of the Applicants, Evergy Missouri Metro and Evergy  
Missouri West.

1   **Q:    What are your responsibilities?**

2    A:    My responsibilities include overseeing the development of Evergy's corporate  
3       strategy, Evergy's long-term generation planning, including Evergy's Energy  
4       Resource Management division, which is responsible for completing the  
5       Applicants' Integrated Resource Plans ("IRP"), and Evergy's Early-Stage  
6       Generation Development. Specifically related to this testimony, Corporate Strategy  
7       monitors the execution of Evergy's strategic initiatives, one of which is the  
8       advancement of transitioning Evergy's generation portfolio, including new  
9       resource development and preparation for future retirements.

10   **Q:    Please describe your education, experience, and employment history.**

11   A:    I hold a Bachelor of Business Administration from Washburn University. Since  
12       joining Evergy in 2007, I have worked in leadership roles across the power  
13       marketing, investor relations, long-term planning, and corporate strategy  
14       departments.

15   **Q:    Have you previously testified in a proceeding at the Missouri Public Service  
16       Commission ("MoPSC" or "Commission") or before any other utility  
17       regulatory agency?**

18   A:    Yes. I have offered testimony before the MoPSC, the Kansas Corporation  
19       Commission ("KCC"), and the Federal Energy Regulatory Commission ("FERC").

20   **Q:    What is the purpose of your direct testimony?**

21   A:    The purpose of my direct testimony is to explain the important role that demand-  
22       side management ("DSM") plays in Evergy's long-term resource planning and to

1 provide updates regarding EMM and EMW's Integrated Resource Plan ("IRP")  
2 2025 and 2026 Annual Updates.

3 **Q: Please summarize your testimony.**

4 A: Missouri's IRP rules require utilities to consider DSM on an equivalent basis with  
5 supply-side resources for long-term planning purposes. My testimony will explain  
6 Evergy's approach to integrating DSM into its long-term planning and summarize  
7 the benefits of having established DSM programs. EMM and EMW have  
8 significant need for new resource additions to meet load requirements that are  
9 growing due to the Southwest Power Pool's resource adequacy rule changes and  
10 economic development activity in the state of Missouri. DSM is an integral part of  
11 EMM and EMW's future resource mix to meet future customer needs. Both utilities  
12 are facing reserve margin needs. Executing MEEIA programs in 2026 and beyond  
13 will help Evergy avoid or defer some incremental supply side resource additions  
14 otherwise required to meet load obligations. MEEIA programs also are a critical  
15 tool for lowering Evergy's overall energy needs during times of peak demand. DSM  
16 can reduce Evergy's overall energy needs during times of peak demand, which then  
17 reduces or eliminates the amount of energy Evergy must procure in Southwest  
18 Power Pool's Integrated Marketplace. Energy is typically higher in price during  
19 times of peak demand, so avoiding or mitigating the need to buy energy through  
20 the marketplace at these critical times results in cost savings to Evergy's retail  
21 customers.

1                   **II.       IRP OVERVIEW AND RELATIONSHIP WITH DSM**

2   **Q:       Please describe the Integrated Resource Plan process in Missouri.**

3   A:       The IRP process is completed under the Commission’s Electric Utility Resource  
4           Planning Rules found in 20 CSR 4240-22. The IRP process results in the selection  
5           of a Preferred Plan, which reflects the combination of supply-side and demand-side  
6           resources that EMM and EMW will use to meet forecasted customer requirements  
7           for the next twenty years. Evergy is required to file an IRP with the Commission  
8           every three years and to provide an annual update detailing any changes in  
9           conditions since the last triennial filing or annual update. Evergy filed its last  
10          Triennial IRP for EMM and EMW on April 1, 2024, in Docket Nos. EO-2024-0153  
11          and EO-2024-0154. It has since filed annual updates for both Evergy Missouri  
12          Metro and Evergy Missouri West on March 13, 2025 (2025 Annual Update) in  
13          Docket Nos. EO-2025-0250 and EO-2025-0251 and May 7, 2026 (2026 Annual  
14          Update) in Docket Nos. EO-2026-0188 and EO-2026-0189.

15   **Q:       What is Evergy’s objective in the current IRP process?**

16   A:       Evergy is guided by the Commission’s Rule at 20 CSR 4240-22.010(2) which  
17           states: “The fundamental objective of the resource planning process at electric  
18           utilities shall be to provide the public with energy services that are safe, reliable,  
19           and efficient, at just and reasonable rates, in compliance with all legal mandates,  
20           and in a manner that serves the public interest and is consistent with state energy  
21           and environmental policies.” To achieve this objective, Evergy’s IRP is performed  
22           using minimization of net present value of revenue requirements (“NPVRR”) as the

1 primary objective function. The IRP compares demand-side and supply-side  
2 resources on an equivalent basis.

3 **Q: What benefit do MEEIA programs offer to long-term integrated resource**  
4 **planning?**

5 A: As Evergy Missouri Metro and Evergy Missouri West continue to execute their  
6 strategies of responsibly meeting future customer electricity needs with a diverse  
7 resource portfolio, leveraging DSM as a long-term resource becomes increasingly  
8 important. The broader energy industry is facing demand that is growing faster than  
9 it has in decades, which is causing many utilities to forecast constrained current and  
10 future capacity reserve margins. Evergy Missouri Metro and Evergy Missouri West  
11 are in a similar position and expect DSM to be an important part of solving for the  
12 need. Just as there is value in having fuel diversity in a generation fleet, there is  
13 value in diversity across demand-side and supply-side resources. To extract the  
14 total potential value of DSM, and to evaluate alongside conventional supply-side  
15 resources, it is critical to have established programs that can be relied upon and  
16 considered over long-term planning horizons. This is particularly important as the  
17 Commission's Rule at 20 CSR 4240-22.060(4) states: "The analysis shall treat  
18 supply-side and demand-side resources on a logically consistent and economically  
19 equivalent basis, such that the same types or categories of costs, benefits, and risks  
20 shall be considered and such that these factors shall be quantified at a similar level  
21 of detail and precision for all resource types."

1 **Q: How was demand side management evaluated in the Evergy's utilities'**  
2 **Triennial IRPs?**

3 A: In the 2024 Triennial IRPs, Evergy's utilities evaluated numerous levels of DSM  
4 programs in their IRP scenarios, ultimately selecting a specific level of DSM for  
5 the twenty-year planning period as part of its Preferred Plan portfolio. Since Evergy  
6 models incremental DSM throughout the full 20-year IRP horizon, it looks very  
7 similar to supply-side resource additions and provides both capacity and energy  
8 benefits. All else equal, DSM added to resource planning scenarios raises the  
9 utilities' accredited capacity position (which reduces the need for new capacity  
10 resources). Similarly, from an energy perspective, incremental DSM in the IRP  
11 model reduces customers' energy requirements (reduces amount of purchased  
12 energy to meet customer needs). The cost/benefit analysis of varying levels of DSM  
13 was evaluated by comparing the NPVRR of the different resource plans. This  
14 analysis process is consistent with how supply-side resource additions are evaluated  
15 in IRPs.

16 **Q: Were there any changes in how DSM was modeled in the Evergy utilities'**  
17 **subsequent 2025 and 2026 Annual Updates?**

18 A: Yes. Evergy filed for its MEEIA Cycle 4 program portfolio on April 29, 2024, after  
19 it filed its 2024 Triennial IRP, in which Evergy conducted a DSM Market Potential  
20 Study to inform its selected portfolio. Evergy has not conducted a new DSM Market  
21 Potential Study since 2023. Evergy's 2024 Triennial IRP process selected the DSM  
22 portfolio presented in Evergy's MEEIA Cycle 4 Application. The MEEIA Cycle 4  
23 proceeding resulted in a settlement that shortened the duration of the MEEIA

1 energy efficiency programs from a proposed 4-year cycle to a 2-year cycle and  
2 shortened the MEEIA demand response programs from a proposed 4-year cycle to  
3 a 3-year cycle.

4 Neither Evergy Missouri Metro nor Evergy Missouri West included a new  
5 DSM forecast in its 2025 Annual Update. Each entity's base case forecast included  
6 impacts of MEEIA Cycle 4 programs as approved by the Commission. Similarly,  
7 in the 2026 Annual Update, Evergy's base case forecast included impacts of  
8 MEEIA Cycle 4 programs as approved by the Commission with adjustments for  
9 demand response impacts to reflect actual achievements from the past year. Each  
10 entity modified its IRP DSM planning profile to reflect the lower approved MEEIA  
11 Cycle 4 portfolio with regard to budget, energy, demand and cycle duration, and to  
12 reflect the uncertainty of future MEEIA programs. Neither entity modeled any  
13 additional energy efficiency programs after the currently approved cycle ends in  
14 2026 but did model the continuation of the approved MEEIA Cycle 4 level of  
15 demand response programs through the end of the IRP planning horizon.

16 **Q: Are there still tangible benefits demonstrated from the approved MEEIA**  
17 **Cycle 4 programs as it relates to capacity accreditation?**

18 A: Yes. The approved MEEIA Cycle 4 programs will deliver a lower capacity  
19 accreditation as compared to the DSM portfolio that was selected by the 2024  
20 Triennial IRP and subsequently filed in the MEEIA Cycle 4 Application. However,  
21 even with the lower levels of MEEIA programs, EMM and EMW customers are  
22 receiving value from the DSM portfolio. Table 8 in both the EMM and EMW 2026  
23 IRPs display the assumed accredited MWs for each utility. Given the significant

1 capacity needs over the IRP planning horizon each MW of DSM that is accredited  
2 generally offsets the need to procure a MW of accreditation through new supply-  
3 side resource additions.

4 **Q: How are the costs of DSM programs structured in Evergy’s IRP modeling?**  
5 **Are MEEIA’s Earnings Opportunities considered?**

6 A: As mentioned above, the DSM (energy efficiency and demand response) programs  
7 were built as part of the DSM Potential Study completed by Applied Energy Group  
8 (“AEG”) in 2023. In the building of those programs, AEG estimated costs to deliver  
9 programs including incentive levels and administrative costs. Those combined  
10 incentives (including the earnings opportunity) and administrative costs, or  
11 “program costs,” were then utilized as part of the cost inputs for DSM when  
12 modeling in the IRP. A 15% budget value has been used for the earnings  
13 opportunity estimate in each IRP filing since 2024.

14 **Q: You stated that incremental DSM reduces the need for new capacity. Did**  
15 **Evergy Missouri Metro and Evergy Missouri West’s 2024 Triennial IRPs show**  
16 **the utilities in need of new capacity?**

17 A: Yes. The 2024 Triennial IRPs outlined Preferred Plans that had both demand-side  
18 and supply-side resource additions to meet future capacity requirements. Beyond  
19 2025, Evergy Missouri Metro and Evergy Missouri West were shown to be short  
20 of their required capacity reserve margin.

1   **Q:    How did the 2025 Annual Update IRPs compare in terms of forecasted**  
2       **capacity need?**

3   A:    The 2025 Annual Update forecasted that Evergy Missouri Metro would have some  
4       summer capacity length above reserve margin requirements through 2027, with  
5       small deficits occurring in 2028 and 2029, leading to an estimated 300 MW  
6       shortage for summer capacity by 2030. With projected load growth, Evergy  
7       Missouri Metro forecasted a need of over 700 MW of summer capacity by the early  
8       2030s. The 2025 Annual Update anticipated a short position on winter capacity  
9       beginning in winter 2028/2029, leading to about a 400 MW shortage beginning in  
10      winter 2031/2032.

11           Evergy Missouri West's 2025 Annual Update projected there would be a  
12      brief short capacity position in 2029, which would be alleviated in 2030. However,  
13      after 2030, Evergy Missouri West was expected to become summer capacity short  
14      again. Projections for winter capacity showed a shortage through winter 2028/2029,  
15      with a need for about 400 MW through winter 2029/2030. Winter capacity was  
16      expected to improve to a shortage of about 100 MW by winter 2030/2031 but  
17      showed a continuous shortage down to about 400 MW by winter 2035/36.

18   **Q:    Have there been further developments in capacity positions in the Evergy**  
19       **entities' 2026 Annual Update IRPs?**

20   A:    Yes. In its 2026 Annual Update, Evergy Missouri Metro continues to show a need  
21       for additional summer capacity beginning in 2027, which increases in 2030-2032  
22       and then levels off beginning in 2033. Evergy Missouri Metro has a greater need  
23       for winter capacity than summer capacity, with projected need being over 300 MW

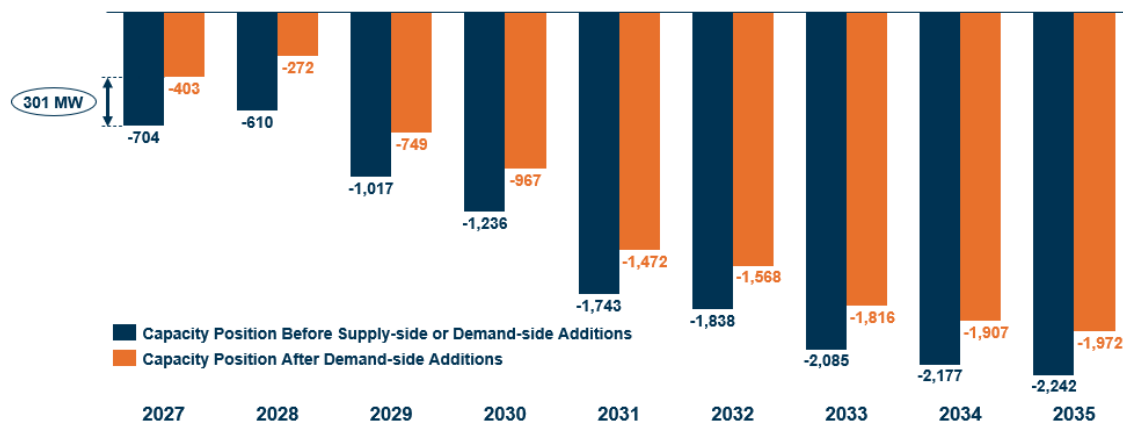
by winter 2028/2029, approximately 700 MW by winter 2031/2032, and approximately 800 MW by winter 2033/2034.

Evergy Missouri West's 2026 Annual Update demonstrated its capacity needs have increased over the planning horizon. It anticipates a need for additional summer capacity 2027-2029 before reaching a positive balance in 2030 but then projects a summer capacity shortage in 2033 and beyond. Evergy Missouri West needs an additional 100 MW of winter capacity by winter 2026/2027, rising to approximately 600 MW in winter 2028/2029. It will experience a slight boost through generation additions planned to be online by winter 2030/2031, but will be short starting in winter 2031/2032, cumulating in a need of 300 MW by winter 2033/2034.

**Q: How do the approved MEEIA Cycle 4 programs impact the Evergy utilities' capacity positions?**

**A:** Figure 1 below shows the impact of the MEEIA Cycle 4 approved DSM portfolio on Evergy Missouri Metro and Evergy Missouri West's summer capacity positions.

**FIGURE 1: COMBINED METRO AND MISSOURI WEST 2026 IRP SUMMER CAPACITY POSITION (MW)**



1   **Q:     Do the IRPs plan for new generation capacity additions even after**  
2       **considering incremental DSM programs?**

3   A:    Yes. Both Evergy Missouri Metro and Evergy Missouri West's Preferred Plans  
4       include the additions of new supply-side generation. Evergy Missouri Metro's  
5       Preferred Plan includes solar generation addition by 2028, a battery storage addition  
6       by 2030, and 795 MW of thermal addition by 2032. Evergy Missouri West's  
7       Preferred Plan includes a solar generation addition by 2027 and approximately 1.5  
8       GW of thermal by 2030.

9               By 2032, the combined Evergy Missouri Metro and Evergy Missouri West  
10       Preferred Plans outline over 2.7 GW of new generation nameplate capacity  
11       additions. The Preferred Plans also include the DSM programs, modeled as  
12       approved in MEEIA Cycle 4. In each of Evergy Missouri Metro and Evergy  
13       Missouri West's Preferred Plans, DSM shows consistent contributions to summer  
14       and winter capacity. This means that while Evergy Missouri Metro and Evergy  
15       Missouri West continue to advance the development of new supply-side resources,  
16       it is also beneficial to invest in incremental DSM programs. In other words, absent  
17       incremental DSM, Evergy's Missouri utilities would need to develop even more  
18       supply-side resources above what is outlined in 2026 Annual Update IRP Preferred  
19       Plans.

20   **Q:     Is there a limit to how much DSM can be deployed? If so, can it eliminate the**  
21       **need for supply-side additions?**

22   A:    Yes. The DSM potential study referenced above outlined a Maximum Achievable  
23       Potential ("MAP") for Evergy Missouri Metro and Evergy Missouri West. The

1 MAP level of DSM was considered in Evergy's 2024 IRPs. Setting the economics  
2 of the MAP level aside, from a capacity position this level of DSM was not enough  
3 to cover the total capacity need shown in the 2024 Triennial Update, and with  
4 continued and increasing capacity needs, remains insufficient.

5 **Q: Given that the IRPs continue to call for incremental generation even after**  
6 **considering the capacity benefits of DSM, does the company still consider the**  
7 **MEEIA programs valuable to offsetting generating capacity?**

8 A: Yes. Absent the impact of the forecasted DSM capacity value, the combined  
9 portfolios would require nearly 300 MW of incremental new supply-side capacity.  
10 This need would likely require Evergy Missouri Metro and Evergy Missouri West  
11 to construct new resources, which would then require the entities to file additional  
12 CCN requests at the Commission. Every accredited MW counts in generation  
13 planning. Evergy sees great value in the added capacity brought by DSM to reduce  
14 the amount of generating capacity needed.

15 **Q: Should the MoPSC approve Evergy's MEEIA Cycle 5 program?**

16 A: Yes. The MEEIA Cycle 5 would allow Evergy to execute and deliver DSM benefits  
17 in line with the DSM capacity profiles that are planned for in the 2026 IRPs. If  
18 approved, Evergy will continue to update in future IRPs the expected benefits of  
19 the MEEIA Cycle 5 portfolio, just as it has done in previous IRPs with previously  
20 approved MEEIA Cycles.

21 **Q: Does that conclude your testimony?**

22 A: Yes, it does.

In the Matter of Evergy Metro, Inc. d/b/a Evergy )  
Missouri Metro's and Evergy Missouri West, Inc. ) File No. EO-2026-0345  
d/b/a Evergy Missouri West's Notice of Intent to )  
File an Application for Authority to Establish a )  
Demand-Side Programs Investment Mechanism )

**STATE OF MISSOURI            )**  
                                               **) ss**  
**COUNTY OF JACKSON        )**

1. My name is Cody VandeVelde. I work in Topeka, Kansas and I am employed by Evergy Metro, Inc. as Senior Director, Strategy and Long-Term Planning - Energy Resource Management.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

  
Cody VandVelde

Notary Public

**ANTHONY R WESTENKIRCHNER  
NOTARY PUBLIC - NOTARY SEAL  
STATE OF MISSOURI  
MY COMMISSION EXPIRES APRIL 28, 2029  
PLATTE COUNTY  
COMMISSION #17279952**