BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Evergy Metro, Inc. d/b/a/ Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Permission and Approval of Certificates of Convenience and Necessity Authorizing them to Construct, Install, Own, Operate, Manage, Maintain, and Control a Natural Gas Production Facility and a Battery Energy Storage System	)))))))	Case No. EA-2026-0343

APPLICATION OF EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST
FOR CERTIFICATES OF CONVENIENCE AND NECESSITY

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("Evergy Missouri Metro" or "EMM") and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West" or "EMW") (collectively, the "Applicants" or "Companies"), pursuant to Sections 393.170.1,[1] 393.190.1 and 393.135.2, as well as 20 CSR 4240-2.060 and 20 CSR 4240-20.045 ("CCN Rule"), file this Application to the Missouri Public Service Commission ("Commission" or "PSC") for three Certificates of Convenience and Necessity ("CCN").

The Applicants request that the Commission authorize Evergy Missouri Metro and Evergy Missouri West to construct, install, own, operate, manage, maintain, and control an advanced class approximately 710-megawatt ("MW") combined-cycle gas turbine ("CCGT") electric generating plant known as the Buchanan Bluffs Energy Center Unit 2, to be located in Buchanan County, Missouri. As this Project will be owned 50% by EMM and 50% by EMW, the Applicants request that they each be granted a CCN.

Applicant Evergy Missouri West requests that the Commission grant it a CCN that authorizes it to construct, install, own, operate, manage, maintain, and control an approximately 109 MW battery energy storage system ("BESS") known as the Foxtrot BESS Project, to be

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

located in Jasper County, Missouri next to the site of the EMW's Foxtrot Solar Project which was granted a CCN by the Commission in Case No. EA-2024-0292 on July 31, 2025.

Evergy Missouri West also requests that the Commission grant it the authority and permission under Section 393.190 to complete the asset transfers and mergers described below regarding the Foxtrot BESS Project, and find that the completion of the asset transfer and merger is not detrimental to the public interest;

Collectively, the Buchanan Bluffs Energy Center Unit 2 Project and the Foxtrot BESS Project will be referred to as the "Projects" or "Assets."

Given that the Applicants do not request a CCN for a solar electrical production facility, as previously indicated in the style of its 60-day Notice of Intended Case Filing submitted on June 1, 2026, they request that the style of this Application be reflected in the records of the Commission and its Data Center.

Applicants request variances from Section (3)(C) of the CCN Rule to provide plans for the restoration of safe and adequate service (under Section (6)(J) of the Rule), and detailed operating and maintenance plans (under Section (6)(I) of the Rule) regarding the Projects in a later submission before authority under the CCNs is exercised.

The Applicants also request that the Commission determine under CCN Rule Section (2)(C) that their respective decisions to acquire, construct, and operate the Projects are prudent. The Companies also request, pursuant to Section 393.135.2(1), that the Commission determine in this Section 393.170 proceeding the amount of construction work in progress ("CWIP") that may be included in their rate bases for the Buchanan Bluffs Energy Center Unit 2.

Finally, the Applicants respectfully request that the Commission order a prehearing conference to occur immediately after the deadline for applications to intervene expires so that a procedural schedule can be issued consistent with the Companies' request that a Commission order granting the requested relief be issued with an effective date of April 5, 2027.

In support of this Application, the Companies state:

I. <u>Evergy Missouri Metro and Evergy Missouri West</u>

1. Evergy Missouri Metro is a Missouri corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. It is engaged in the generation, transmission, distribution, and sale of electricity in western Missouri and eastern Kansas, operating primarily in the Kansas City metropolitan area. Evergy Missouri Metro is an "electrical corporation" and a "public utility" subject to the jurisdiction, supervision, and control of the Commission under Chapters 386 and 393. Evergy Missouri Metro's certificate of good standing was filed in Case No. EN-2020-0063 and is incorporated by reference pursuant to 20 CSR 4240-2.060(1)(G).

2. Evergy Missouri West is a Delaware corporation with its principal office and place of business at 1200 Main Street, Kansas City, Missouri 64105. It is engaged in the generation, transmission, distribution, and sale of electricity in western Missouri, including the suburban Kansas City metropolitan area, St. Joseph, Warrensburg, Sedalia, Nevada, and surrounding counties. Evergy Missouri West is an "electrical corporation" and a "public utility" subject to the jurisdiction, supervision, and control of the Commission under Chapters 386 and 393. A certificate of authority for EMW to do business in Missouri as a foreign corporation was filed with the Commission in No. EN-2020-0064 and is incorporated by reference pursuant to 20 CSR 4240-2.060(1)(G).

3. Evergy Missouri Metro and Evergy Missouri West have no annual reports or regulatory assessment fees that are overdue. EMM and EMW are wholly owned subsidiaries of

Evergy, Inc. ("Evergy"), as is Evergy Kansas Central, Inc. ("Evergy Kansas Central"). Evergy currently operates over 12,000 MW of generation facilities.

4. Evergy Missouri Metro and Evergy Missouri West have no pending actions or final unsatisfied judgments or decisions against them from any state or federal agency or court that involve customer services or rates which action, judgment, or decision has occurred within three years of the date of this Application, except as follows:

- Show Me Ethanol, LLC v. Evergy Missouri Metro, File No. EC-2026-0064;
- Mark A. Hill and Bethann C. Hill v. Evergy Missouri West, File No. EC-2026-0350;
- Denise Wray Allegri v. Evergy Missouri West, File No. EC-2027-0056;
- Timothy P. Allegri v. Evergy Missouri West, File No. EC-2027-0058;
- Candace K. Robertson v. Evergy Missouri West, File No. EC-2027-0065; and
- Stephen L. Robertson v. Evergy Missouri West, File No. EC-2027-0067.

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

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6. Evergy Missouri Metro and Evergy Missouri West filed their Notice of Intended Case Filing to comply with the 60-day notice provision of 20 CSR 4240-4.017(1) on June 1, 2026.

7. In further support of this Application, the Applicants have contemporaneously filed the direct testimony of the following Evergy witnesses:

Witness	**Subject Matter**
1. Kevin Gunn	Overview of the Projects; the basis for granting the requested CCNs under the Commission's CCN Rule and the traditional Tartan factors
2. Jason Humphrey	Overview of generation planning/development in connection with the Integrated Resource Planning (IRP) process
3. J Kyle Olson	Selection, location and description of Buchanan Bluffs Energy Center Unit 2; Owner's Engineer; Engineering, Procurement and Construction contractor; Power Island Equipment manufacturer; transmission interconnection
4. Cody VandeVelde	Evergy's IRP process; Applicants' latest IRP reports, as modified by EMW's August 2026 Revised Resource Plan, supplemented by recent analysis that shows the need for the Projects
5. Ronald Klote	Regulatory accounting issues; construction work in progress (CWIP) for the Buchanan Bluffs Energy Center Unit 2; jurisdictional cost allocation
6. John Grace	Applicants' ability to finance and own the Projects
7. John Carlson	Project description, construction and governance controls relating to the Foxtrot BESS Project; Project construction and governance controls related to the Buchanan Bluffs Energy Center Unit 2
8. JP Meitner	Natural gas fuel and market issues; Evergy's gas procurement plan
9. Zachary Gladhill	Growth in large load power customers; economic development, affordability and public interest issues

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

II. CCN Request for the Buchanan Bluffs Energy Center Unit 2

A. Project Description

9. To respond to the existing and evolving critical need to deploy dispatchable generation in a timely fashion, Evergy Missouri Metro and Evergy Missouri West each request CCNs to construct, install, own, operate, manage, maintain, and control an advanced class approximately 710 MW CCGT natural gas electric generating facility known as the Buchanan Bluffs Energy Center Unit 2 which will be located in Buchanan County, Missouri. This facility will be 50% owned by Evergy Missouri Metro and 50% owned by Evergy Missouri West, and will serve their existing and future customers, including significant estimated large load increases. This natural gas facility will be included in the Companies' respective rate bases, and its prudently incurred costs will be recovered in retail rates.

10. Constructing the Buchanan Bluffs Energy Center Unit 2 is an important part of a larger overall plan called for by the Companies' respective Preferred Plans reflected in their 2025 and 2026 IRP Annual Updates. The 2025 IRP Annual Updates were filed by Evergy Metro, Inc. in No. EO-2025-0250 and by Evergy Missouri West in No. EO-2025-0251 on March 13, 2025.[2] The Buchanan Bluffs Energy Center Unit 2 is also included in the Companies' 2026 IRP Annual Updates which were filed on May 7, 2026, by EMM in No. EO-2026-0188 and by EMW in No. EO-2026-0189.[3] EMW filed its August 2026 Revised Resource Plan on August 31, 2026, in No. EO-2026-0189, as discussed below. The Buchanan Bluffs Energy Center Unit 2 will help meet both Evergy Missouri Metro's and Evergy Missouri West's current and forecasted energy and

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[2] See EMM 2025 Annual IRP Update, In re Evergy Mo. Metro 2025 Integrated Resource Plan Annual Update Filing, No. EO-2025-0250 (Mar. 13, 2025); EMW 2025 Annual IRP Update, In re Evergy Mo. West 2025 Integrated Resource Plan Annual Update Filing, No. EO-2025-0251 (Mar. 13, 2025).

[3] See EMM 2026 Annual IRP Update, In re Evergy Mo. Metro 2026 Integrated Resource Plan Annual Update Filing, No. EO-2026-0188 (May 7, 2026); EMW 2026 Annual IRP Update, In re Evergy Mo. West 2026 Integrated Resource Plan Annual Update Filing, No. EO-2026-0189 (May 7, 2026).

capacity requirements, as identified in these IRP Updates, and in their continuing resource planning efforts which will support generation portfolios that are reliable, affordable, and sustainable.

B. CCN Rule Filing Requirements

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

12. The Companies provide the following information pursuant to Section (6) of the CCN Rule which requires that an application for a construction CCN include 11 categories of information regarding the generation asset.

13. CCN Rule Section (6)(A) requires "A description of the proposed route or site of construction; …." The Buchanan Bluffs Energy Center Unit 2 will be built on an approximately 170-acre site in Buchanan County near Frazier, Missouri. A detailed description of the facility to be constructed and its site is provided in the direct testimony of J Kyle Olson (Evergy's Senior Director of Conventional Generation Projects).

14. CCN Rule Section (6)(B) requires "A list of all electric . . . conduit, wires, cables, and lines of regulated and nonregulated utilities, railroad tracks, and each underground facility as defined in Section 319.015, which the proposed construction will cross; …." The Buchanan Bluffs Energy Center Unit 2 does not cross any utility facilities, railroad tracks, or an underground facility.

15. CCN Rule Section (6)(C) requires "A description of the plans, specifications, and estimated costs for the complete scope of the construction project that also clearly identifies what will be the operational features of the asset once it is fully operational and used for service; …." As detailed in Mr. Olson's testimony, Evergy has selected Burns & McDonnell Engineering Company, Inc. ("B&M") of Kansas City, Missouri as its Owner's Engineer ("OE"). Evergy is in the process of procuring Power Island Equipment ("PIE") manufactured by Mitsubishi Power Americas Inc. ("Mitsubishi") through a Reservation Agreement leading to a PIE Supply Agreement, and has engaged Kiewit Power Constructors Co. ("Kiewit") as its Engineering, Procurement, and Construction ("EPC") contractor. The 710-MW Buchanan Bluffs Energy Center Unit 2's PIE will consist of a 1x1 single-shaft advanced J-Class gas turbine, an electrical generator, a heat recovery steam generator, and a steam turbine with exhaust cooled by an air-cooled condenser.

16. The Buchanan Bluffs Energy Center Unit 2 will utilize the same OE (B&M) and the same EPC contractor (Kiewit), as well as the common generation technology supplied by the PIE manufacturer (Mitsubishi) that the Commission approved in its Report & Order of July 31, 2025, regarding Evergy Missouri West's requests for CCNs in No. EA-2025-0075 regarding the Chisholm Trail (formerly known as Viola) and McNew CCGTs, and the Mullin Creek #1 simple-cycle generating turbine ("SCGT"). B&M and Kiewit will also be used in Evergy Missouri Metro's Application for a CCN to construct the Mullin Creek #2 SCGT in No. EA-2026-0154 which was filed on May 14, 2026. As a result, the economies of scale within these core functions will lead to a more efficient, reliable, and cost-effective delivery of the Buchanan Bluffs Energy Center Unit 2 plant. The estimated costs for the complete scope of the construction of Buchanan

Bluffs Unit 2, excluding the allowance for funds used during construction ("AFUDC") and the effect of any CWIP allowed in rate base, is approximately **[redacted]**.

17. The Applicants propose that Buchanan Bluffs Energy Center Unit 2 will be owned 50% (or 355 MW) by Evergy Missouri Metro and 50% by Evergy Missouri West. The cost to construct this project will be financed through EMM's and EMW's available financial resources, with each joint owner responsible for its proportionate share of the generating unit during construction to ensure that each utility's customers pay only for the facilities from which they will receive benefits. It is intended that Buchanan Bluffs Energy Center Unit 2 will ultimately be included in the Companies' respective rate bases through the Commission's traditional ratemaking and cost of capital procedures which Evergy witness John Grace (Senior Director, Corporate Planning and Financial Performance) explains in his direct testimony.

18. This proposal to construct Buchanan Bluffs Energy Center Unit 2 is the most cost-effective solution to meet the energy needs of EMM and EMW customers over the twenty-year planning horizon of the Companies' Integrated Resource Plans when compared to other options. Evergy witnesses Jason Humphrey (Vice President of Development) and Cody VandeVelde (Senior Director of Strategy and Long-Term Planning) discuss Evergy's generation development and IRP process, and explain why building Buchanan Bluffs Energy Center Unit 2 is the best solution for Evergy Missouri Metro and Evergy Missouri West. The selection of an OE, the PIE manufacturer, and the EPC contractor for Buchanan Bluffs Energy Center Unit 2 was based on the results of prior competitive request-for-proposal ("RFP") processes conducted for Evergy's Chisholm Trail and McNew projects, as explained in Mr. Olson's direct testimony. Evergy carried forward those competitively selected firms and contractual frameworks as part of its "design once, build many" development approach.

19. CCN Rule Section 6(D) requires that an application include: "The projected beginning of construction date and the anticipated fully operational and used for service date of the asset; …." The projected beginning of construction date for Buchanan Bluffs Energy Center Unit 2 is 2027, well before pre-summer 2032 when it is expected to be fully operational, and used and useful for service.

20. CCN Rule Section 6(E) requires that an application include: "A description of any common plant to be included in the construction project; …." As Mr. Olson testifies in his direct testimony, the Buchanan Bluffs Energy Center Unit 2 will be co-located with and developed jointly with the essentially identical Buchanan Bluffs Energy Center Unit 1 which will be owned by Evergy Kansas Central. The two units will share switchyard/interconnection facilities, the gas lateral and metering station, water supply and treatment infrastructure, access roads, the control/administration building, stormwater and security infrastructure, as well as construction laydown areas.

21. CCN Rule Section 6(F) requires that an application include: "Plans for financing the construction of the asset; …." As noted above, the Buchanan Bluffs Energy Center Unit 2 will be financed using the Companies' existing debt and equity financing structures, similar to other capital investments made by Evergy Missouri Metro and Evergy Missouri West.

22. CCN Rule Section 6(G) requires that an application include: "A description of how the proposed asset relates to the electric utility's adopted preferred plan under 4 CSR 240-22; …." As discussed in the direct testimony of Mr. VandeVelde, Evergy Missouri Metro's 50% ownership share in Buchanan Bluffs Energy Center Unit 2 (355 MW) corresponds to 355 MW of thermal generation needed by 2032, as identified in EMM's 2025 and 2026 Annual IRP Updates. Similarly, Evergy Missouri West's 50% ownership in Buchanan Bluffs Energy Center Unit 2 corresponds to

355 MW of thermal generation needed by 2032, as identified in EMW's 2026 Annual IRP Update and its August 2026 Revised Resource Plan filed on August 31, 2026.

23. CCN Rule Section 6(H) requires that an application include: "An overview of the electric utility's plan for this project regarding competitive bidding, although competitive bidding is not required, for the design, engineering, procurement, construction management, and construction of the asset; …." In his direct testimony Mr. Olson discusses how B&M, as the OE, will provide augmented technical and managerial support to Evergy Missouri Metro and Evergy Missouri West for the Buchanan Bluffs Energy Center Unit 2 which will include oversight of the EPC contractor. Relying on the competitive RFP process discussed by Mr. Olson in his direct testimony, the Applicants are working with B&M pursuant to the OE services contract that was entered into with B&M for the construction of the Chisholm Trail (f/k/a Viola) and McNew CCGT plants, as well as the Mullin Creek #1 and #2 SCGT units in order to maximize efficiencies. With the assistance of B&M, the Companies issued a competitive RFP for the PIE supplier which resulted in the selection of Mitsubishi. With similar assistance from B&M, Kiewit was chosen to serve as the EPC contractor for Buchanan Bluffs Energy Center Unit 2.

24. CCN Rule Section 6(I) requires that an application include: "An overview of plans for operating and maintaining an asset; …." Evergy currently operates over 12,000 MW of a variety of generation facilities, including natural gas generating units. When completed, Buchanan Bluffs Energy Center Unit 2 will join Evergy's generation portfolio and will benefit from the knowledge and experience gained from Evergy's operation of electric generating plants over many years. The Companies will provide more detailed operations and maintenance plans when they are available closer to Buchanan Bluffs Energy Center Unit 2's commercial operation date in pre-

summer 2032. The Applicants respectfully request that the Commission approve a variance from this provision under 20 CSR 4240-2.060(4) and CCN Rule Section 3(C).

25. CCN Rule Section 6(J) requires that an application include: "An overview of plans for restoration of safe and adequate service after significant, unplanned/forced outages of an asset; …." Applicants also request a variance from this provision, per 20 CSR 4240-2.060(4) and CCN Rule Section 3(C), so that their plans for the restoration of safe and adequate service can be provided closer to the time that Buchanan Bluffs Energy Center Unit 2 will begin commercial operations in pre-summer 2032.

26. There is no requirement for Evergy Missouri Metro or Evergy Missouri West to provide notice under CCN Rule (6)(K) because there are no electric transmission line routes or transmission substations outside of the site property boundary proposed for the Buchanan Bluffs Energy Center Unit 2. As discussed by Mr. Olson, outreach has occurred with local governmental authorities, communities, and landowners near the site of the facility in Buchanan County.

C. Public Convenience and Necessity under Section 393.170

27. Pursuant to CCN Rule Section (3)(A), Applicants provide the following "facts showing that granting the application is necessary or convenient for the public service; …."

28. The PSC may grant a CCN if the proposed construction is "necessary or convenient for the public service." See § 393.170.3; CCN Rule § (3)(A). Missouri courts have consistently held that "necessity" does not mean "essential" or "absolutely indispensable." The concept of necessity is that the additional service "would be an improvement justifying its costs" and be "desirable for the public welfare." See United for Missouri v. PSC, 515 S.W.3d 754, 759 (Mo. App. W.D. 2016); State ex rel. Intercon Gas, Inc. v. PSC, 848 S.W.2d 593, 597-98 (Mo. App. W.D. 1993). If "the public convenience will be enhanced" and "there is [a] reasonable necessity" for the service, then the public "convenience and necessity" and "need" are served by granting the

CCN. See State ex rel. Beaufort Transfer Co. v. Clark, 504 S.W.2d 216, 219 (Mo. App. K.C. 1973).

29. The Commission generally applies five criteria known as the Tartan factors in CCN cases.[4] The Tartan factors are: (1) There must be a need for the service; (2) The proposal must be economically feasible; (3) The applicant must have the financial ability to provide the service; (4) The applicant must be qualified to provide the service; and (5) The proposed service must promote the public interest. See Missouri Landowners Alliance v. PSC, 593 S.W.3d 632, 638 & n.6 (Mo. App. E.D. 2019), *aff'g* Report & Order on Remand at 40-47, In re Grain Belt Express Clean Line LLC, No. EA-2016-0358 (Mo. P.S.C., Mar. 20, 2019). An affirmative finding on the first four factors will generally lead to a finding that the requested CCN will promote the public interest. See In re Tartan Energy Co., 1994 WL 762882 at *14, No. GA-94-127 (Mo. P.S.C. 1994).

30. Evergy's Vice President of Regulatory and Government Affairs Kevin Gunn provides an overview of the Applicants' request for the CCNs. He explains in his direct testimony how Buchanan Bluffs Energy Center Unit 2 meets the requirements set forth in Section 393.170, the CCN Rule, as well as the Commission's traditional Tartan standards for evaluating and approving the CCN requests.

31. Mr. Gunn states that the Companies' decision to construct Buchanan Bluffs Energy Center Unit 2 is prudent and that the Commission should so determine under Section (2)(C) of the CCN Rule. He also notes the request that the Commission determine under Section 393.135.2(1), enacted as part of S.B. 4 in 2025, the amount of CWIP that may be included in rate base for the facility. The direct testimony of Evergy witness Ronald Klote (Senior Director of Regulatory

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

Affairs) addresses this issue in detail. Such a decision will incentivize the construction of Buchanan Bluffs Energy Center Unit 2, provide savings to customers over the long run compared to traditional accounting principles, and expand the Companies' electrical capacity.

1. There is a Need for Buchanan Bluffs Energy Center Unit 2

32. The Companies' 2026 Annual IRP Updates (including EMW's August 2026 Revised Resource Plan) assessed and confirmed their increased capacity needs based not only on load growth, but also on the higher resource adequacy requirements of Southwest Power Pool, Inc. ("SPP"), the regional transmission organization of which the Evergy utilities are members. These requirements are intended to ensure that SPP and its members are able to meet the threats of extreme weather conditions, as experienced during Winter Storms Uri, Elliott, Gerri/Heather, and Fern (2021-2026), as well as during summer heat waves such as are occurring in 2026 throughout western Missouri and SPP's East Balancing Authority.[5]

33. Evergy Missouri Metro's 2026 IRP Update "shows increasing needs for Metro inclusive of higher large-load customer growth, beginning in 2026 and exceeding 300 MW by 2031."[6] A large load customer that was previously included in EMM's 2025 IRP Update has signed an energy service agreement ("ESA"), thus "increasing the certainty of large load committed in Metro's forecast."[7] In addition to large-load customer growth, the changes in Metro's resource needs are driven by other factors, including SPP increases "for expected summer and winter reserve margins and capacity accreditation," the "cost and performance characteristics

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[5] See "SPP sets all-time peakload record of 58.127 GW as hot weather alerts persist," Megawatt Daily at 2-3 (July 28, 2026).
[6] See EMM 2026 Annual IRP Update at 3.
[7] Id.

of new thermal resource options," "updates to solar, wind, and storage costs," and "changes in policy for renewable and [battery] storage tax credits."[8]

34. Evergy Missouri Metro's 2026 IRP Update states that its "Preferred Plan calls for 150 MW each of solar and storage qualifying for production tax credits ('PTC') and investment tax credits ('ITC') … to meet reserve margin needs," as well as a "½ Combined-Cycle Gas Turbine ('CCGT') in 2032" which is the Buchanan Bluffs Energy Center Unit 2.[9]

35. Evergy Missouri West's 2026 IRP Annual Update, as well as its August 2026 Revised Resource Plan, also found a clear need for it to own 50% of Buchanan Bluffs Energy Center Unit 2. "The 2032 half CCGT is a critical addition that addresses the residual capacity gap emerging as large load customers ramp to steady-state consumption, which approaches 800 MW of peak demand by 2032."[10] Similar to EMM, the Evergy Missouri West 2026 IRP Update made findings of need caused by SPP's increased summer and winter reserve margin requirements and capacity accreditation; the cost and performance characteristics of new thermal resource options; updates to solar, wind, and storage costs; and changes in tax credits for renewable and storage facilities.[11] The updated load forecast in the EMW August 2026 Revised Resource Plan increased its peak load by 75 MW beginning in the winter of 2028-29 after Evergy Missouri West agreed to an amended load forecast for a large load customer with an ESA.

36. As the Commission is aware, in August 2024 SPP's board of directors approved a 2025 proposal to set the minimum summer season planning reserve margin ("PRM") at 16% for the summer of 2026, and a 36% winter season PRM for the winter of 2026-2027.[12] SPP advised

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[8] Id.
[9] Id. at 4.
[10] See EMW 2026 Annual IRP Update at 111.
[11] Id. at 3.
[12] See SPP Board Approves New Planning Reserve Margins to Protect Against High Winter, Summer Use (Aug. 6, 2024), https://www.spp.org/news-list/spp-board-approves.

the Commission at its May 21, 2025 Public Meeting that these PRM levels will be increased further in 2029 to 17% for the summer season and to 38% for the winter season of 2029-2030.[13] FERC approved SPP's tariff revisions that established these higher PRM requirements in August 2025.[14] The August 19, 2026 report by SPP to the Commission summarized the "demand growth certainty" it is experiencing, noting "signed service agreements to add ~ 9.6 GW (17% increase compared to peak)" and "10 GW HILL [High Impact Large Loads] going through AQ/AX [interconnection proceedings] right now."[15] The SPP report advised: "This is up to 35% peak growth within three years" and "Much more is coming."[16]

37. The direct testimony of Mr. Humphrey and Mr. Olson discuss the Companies' ongoing efforts to execute Evergy's corporate strategy of affordability, reliability, and sustainability. This includes investments in new generation through 2030 of approximately $9.3 billion of natural gas, renewable, and battery storage capacity to support historic economic development opportunities in Missouri and Kansas in an "all-of-the-above" approach to resource planning.[17] This resource mix "provides technology and fuel diversity that hedges against execution risk and any single resource category and positions the [Applicants] to adapt as market conditions, tax policy, and customer commitments evolve."[18]

38. In light of the significant increase in load growth, extreme winter and summer weather conditions, and the role that dispatchable generation must play in response to them, the

[13] See Mo. Public Serv. Comm'n Public Meeting, No. AGND-2025-0049, SPP Resource Adequacy & Summer Assessment at 10, delivered by Bruce Rew, Senior Vice President of Operations (May 21, 2025).
[14] See Order Accepting Tariff Revisions at 9-12, Southwest Power Pool, Inc., 192 FERC ¶ 61,161, No. ER25-89 (Aug. 19, 2025).
[15] See Mo. Public Serv. Comm'n Public Meeting, No. MTGS-2027-0001, Southwest Power Pool Third Quarter RTO Update at 9, delivered by Casey Cathey, Vice President of Engineering (Aug. 19, 2026).
[16] Id.
[17] Evergy, Inc. 2025 Annual Report, Form 10-K at 39 (Feb. 18, 2026).
[18] See EMM 2026 Annual IRP Update at 5.

need for Buchanan Bluffs Energy Center Unit 2 is clear. The resource plans of Evergy Missouri Metro and Evergy Missouri West have been developed to respond to this need for additional capacity, as well as SPP's higher planning reserve margin requirements, more rigorous seasonal capacity accreditation standards, and the region's increasingly volatile weather.[19]

39. The direct testimony of Mr. Gunn, Mr. VandeVelde, and Mr. Humphrey further explain how the addition of Buchanan Bluffs Energy Center Unit 2 to the Applicants' generation fleets will provide an economical and dispatchable resource that will allow them to meet today's significant increase in customer demand which will continue to grow in the future. Evergy announced in February 2026 that it had signed ESAs with two new large customer projects and that it is expanding two existing projects.[20] These projects are designed to serve data centers with a projected peak steady-state load of approximately 1,900 MWs.[21] Mr. VandeVelde explains that EMM's 2026 IRP Annual Update includes forecasts associated with three large-load customers in its service territory, one of which has signed a Large Load Power Service ("LLPS") ESA in 2026.[22] Evergy Missouri West "has five specific large load customers that meet the criteria for base load planning" and have been incorporated into all of its forecast scenarios for the 2026 IRP Annual Update.[23] These ESAs that govern large-load projects are subject to the Companies' current LLPS Rate Plan tariff[24] which was approved by the PSC in February 2026. As noted above, EMW's updated load forecast recently increased peak load by 75 MW beginning in winter 2028-29.

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[19] See Report & Order at 12, In re Applic. of Evergy Metro Inc. and Evergy Mo. West, Inc., No. EA-2025-0075 (July 31, 2025); *Our Generational Challenge: Reliable Future for Electricity* at 1-2, Southwest Power Pool, Inc., https://www.spp.org/documents/72058/our%20generational%20challenge%20paper.pdf. (2024); EMM 2026 Annual IRP Update at 3-4; EMW 2026 Annual IRP Update at 3-4, 112.
[20] Evergy, Inc. 2025 Annual Report, Form 10-K at 40 (Feb. 18, 2026).
[21] Id.
[22] EMM 2026 IRP Update at 3, 23.
[23] EMW 2026 IRP Update at 23.
[24] Id. See Order Approving Tariffs at 1-2, In re Evergy App. for Approval of Tariffs to serve Large Load Customers, No. EO-2025-0154 (Feb. 25, 2026).

40. The Commission has recognized this continuing surge in new load and the need to approve tariffs that would provide service to loads of 100 MWs or more. In Evergy's LLPS Rate Plan case, the PSC confirmed that under Section 393.1300.7 this tariff will "reasonably ensure" that the rates of large loads will reflect their "representative share of the costs incurred to serve" them and will "prevent other customer classes' rates from reflecting any unjust or unreasonable costs arising from such service."[25] The Commission observed that data centers and similar loads, in addition to being "large consumers of power," can serve as "economic and operational partners that provide important advantages to electric utilities and their customers."[26]

41. The PSC's Large Load Customer Order summarized the "advantages" and "benefits" that large loads can bring to electric utilities, referring to them as "partners" that can "help[ ] distribute fixed costs across a larger energy volume" which "contributes to a lower average cost per kilowatt-hour for all customers."[27] The Commission, in particular, noted that "AI technology, combined with the widescale electrification of various industries, ... is driving significant electric load growth across the country ...."[28] It concluded that Evergy's LLPS Rate Plan, as amended, "reflects broad stakeholder consensus" and "contains strong safeguards to ensure that large new loads pay their fair share while enabling growth that benefits Missouri."[29] Given these developments in Missouri and in the SPP region, the need for flexible, dispatchable resources like Buchanan Bluffs Energy Center Unit 2 is clear.

42. In light of this rapid and steady load growth occurring in the Applicants' service territory and the territories of the region's other electric utilities, SPP has implemented new and

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[25] Report & Order at 7, 22-23 (Nov. 13, 2025), In re Evergy App. for Approval of Tariffs to Serve Large Load Customers, No. EO-2025-0154 ("Large Load Customer Order"), *citing* § 393.130.7 (enacted as part of S.B. 4 in 2025).
[26] Id. at 9, ¶ 8.
[27] Id. at 10, ¶ 9.
[28] Id. at 11, ¶ 13.
[29] Id. at 28.

innovative proposals to manage these developments and their needs. The Expedited Resource Adequacy Study ("ERAS") was proposed by SPP in May 2025 "to provide a framework for the expedited study of [generator] interconnection requests to address urgent resource adequacy needs in the near term."[30] Moving quickly, FERC accepted SPP's proposal, finding that the ERAS eligibility criteria and requirements "are intended to ensure that non-speculative, 'shovel ready' projects ... move expeditiously to ... execution."[31] On rehearing, FERC confirmed its decision that the ERAS process provided an appropriate framework "to address urgent, near-term resource adequacy needs" which it described as "a looming resource adequacy shortfall."[32] As Mr. Olson notes in his direct testimony, the ERAS process identified two categories of transmission expenses for the Buchanan Bluffs Energy Center Unit 2: (a) Interconnection Facilities costs of approximately **[redacted]** and (b) Network Upgrades of approximately **[redacted]**.With SPP's new procedures to study and interconnect new large loads and the generation to serve them, Buchanan Bluffs Energy Center Unit 2 is the logical new resource to provide capacity and energy to meet these needs, along with Applicants' other generation assets. As an owned resource, Buchanan Bluffs Energy Center Unit 2 will be under the Companies' operational control, and its costs will be recovered in base rates, as approved by the Commission.

43. In his direct testimony, Mr. VandeVelde reviews the updated IRP modeling analysis which shows that the increase in large industrial and commercial loads in the Applicants' service territories have placed a significant strain on their existing resources. These developments have required proactive planning and system expansion to ensure that new resources are reliable,

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[30] Order Accepting Tariff Revisions, Subject to Condition at 1, Southwest Power Pool, Inc., 192 FERC ¶ 61,062, No. ER25-2296 (2025) ("ERAS Order").
[31] Id. at 89
[32] Order Addressing Arguments Raised on Rehearing at 1-2, 71, Southwest Power Pool, Inc., 194 FERC ¶ 61,051, No. ER25-2296-002 (Jan. 22, 2026) ("ERAS Rehearing Order").

flexible, and affordable. The Buchanan Bluffs Energy Center Unit 2 will satisfy this need to ensure that Evergy Missouri Metro and Evergy Missouri West continue to provide safe and adequate service.

2. <u>Buchanan Bluffs Energy Center Unit 2 is Economically Feasible</u>

44. The Companies' decision to add Buchanan Bluffs Energy Center Unit 2 to their resources is economically feasible as it will produce efficient, low-cost energy in Missouri, as described in the direct testimonies of Mr. VandeVelde, Mr. Gunn, and Mr. Humphrey. The facility will add a dispatchable, fuel-diverse resource to the Companies' generation fleets while helping EMM and EMW meet their forecasted capacity and energy needs.

45. Buchanan Bluffs Energy Center Unit 2 will be a highly efficient combined-cycle natural gas generating unit that will enable the continuing modernization of Evergy's generation fleet, consistent with its "all-of-the-above" resource strategy. The dispatchability and firm gas delivery of the facility will ensure that Buchanan Bluffs Energy Center Unit 2 is an economically feasible and secure resource that will meet the requirements of SPP's Performance Based Accreditation methodology and its related Fuel Assurance tariff revisions recently approved by FERC.[33]

3. <u>Applicants are Able to Finance Buchanan Bluffs Energy Center Unit 2</u>

46. The direct testimony of Mr. Grace explains that Evergy Missouri Metro and Evergy Missouri West have the financial resources to raise the capital necessary to proceed with the construction of Buchanan Bluffs Energy Center Unit 2. The Applicants have proven experience

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

in financing the purchase, construction, and operation of generating assets that serve Missouri customers.

47. Evergy Missouri Metro has adequate short-term liquidity and is able to access additional short-term liquidity as needed. Mr. Grace notes that Evergy Missouri Metro sells an undivided percentage ownership interest in its retail accounts receivable ("A/R") to an independent outside investor whose A/R sales facility can provide borrowing opportunities for EMM. Evergy Missouri Metro also has access to the capital investment markets which can provide additional financing for Buchanan Bluffs Energy Center Unit 2, if necessary. EMM currently has stable credit ratings of Baa1 from Moody's and A- from Standard & Poor's. Evergy Missouri Metro will provide service from Buchanan Bluffs Energy Center Unit 2 by including it in rate base at its authorized weighted average cost of capital.

48. Evergy Missouri West has adequate short-term liquidity and access to additional short-term liquidity as needed. EMW also has access to an A/R sales facility like EMM, as well as to capital investment markets which can provide additional financing, if necessary. EMW currently has stable credit ratings of Baa3 from Moody's and BBB+ from Standard & Poor's. Evergy Missouri West will also provide service from Buchanan Bluffs Energy Center Unit 2 by including it in rate base at its authorized weighted average cost of capital.

4. Applicants are Qualified to Construct Buchanan Bluffs Energy Center Unit 2

49. As the direct testimonies of Mr. Humphrey and Mr. Carlson state, Evergy Missouri Metro and Evergy Missouri West have constructed, owned, and operated various types of electric generating plants in Missouri and Kansas for many years. Such experience and expertise will be applied when EMM and EMW begin to operate Buchanan Bluffs Energy Center Unit 2, along with the combined experiences of B&M, Mitsubishi, and Kiewit.

5. **<u>The Buchanan Bluffs Energy Center Unit 2 is in the Public Interest</u>**

50. In addition to the factors discussed above, which demonstrate that approval of the Application is in the public interest, Buchanan Bluffs Energy Center Unit 2 will be a reliable and dispatchable energy resource for both Evergy Missouri Metro and Evergy Missouri West to serve the rapidly growing demand for electricity in their service territories.

51. Because Buchanan Bluffs Energy Center Unit 2 will be a highly efficient natural gas-fired generating facility, capable of providing reliable capacity during periods of peak demand and grid stress, it will serve the public interest by strengthening grid reliability and supporting Missouri's energy security. Additionally, the Buchanan Bluffs Energy Center Unit 2 will directly and indirectly create jobs during construction and ongoing operations, generate significant tax revenues for the State of Missouri and local governments, and contribute to economic development initiatives in the service territories of the Applicants. Moreover, Buchanan Bluffs Energy Center Unit 2 will utilize the same OE (B&M) and the same EPC contractor (Kiewit), and will utilize the same natural gas generation technology and equipment that is supplied by the PIE manufacture (Mitsubishi) for the Chisholm Trail and McNew CCGT projects. This is consistent with Evergy's philosophy of "design once, build many" philosophy described by Mr. Olson in his direct testimony in this case, as well as in No. EA-2025-0075 where the Commission granted CCN's to EMW on July 31, 2025, for its share of the Chisholm Trail and McNew Projects. The same economies of scale discussed in that proceeding will be implemented in this case. Finally, as discussed by Mr. Humphrey and Mr. Meitner, the request for proposal process regarding fuel for the Buchanan Bluffs Energy Center Unit 2 will afford the opportunity for interconnection with pipelines that Evergy does not currently contract with to enhance fuel supply diversity and reliability.

III. CCN Request for the Foxtrot Battery Energy Storage System

A. Project Description

52. The Foxtrot Battery Energy Storage System (BESS) is an approximately 109 MW, four-hour lithium ion facility that will be located in Jasper County, Missouri next to the Foxtrot Solar Project that was granted a CCN by the Commission on July 31, 2025.[34] The Foxtrot BESS Project is being developed for Evergy Missouri West by Foxtrot Energy Storage Holdings LLC ("Foxtrot Invenergy"), whose affiliate Invenergy Renewables LLC ("Invenergy Renewables") is developing the Foxtrot Solar Project for EMW. The Foxtrot BESS Project will consist of specially designed outdoor-rated battery enclosures.

53. Evergy Missouri West will construct, install, operate, maintain, and own 100% of the Foxtrot BESS Project which will support renewable energy integration, reduce reliance on fossil fuels, and improve overall grid stability and reliability. This battery storage project will increase EMW's operational responsiveness and flexibility, allowing it to satisfy demand during high and critical peak periods, as well as to help manage outages caused by severe weather events.

B. CCN Rule Filing Requirements

54. As discussed above in Section II(B), Section (6) of the Commission's CCN Rule requires that an application for a Construction CCN include 11 categories of information regarding the generation asset.

55. The Foxtrot BESS Project will be constructed in northwest Jasper County next to the Foxtrot Solar Project and near the 161 kV Asbury substation. A more detailed description of the facility's site is provided in the direct testimony of Evergy witness Mr. Carlson. See CCN Rule (6)(A).

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[34] See Order Approving Stip. & Agmt. and Granting CCNs at 1, 5, In re Evergy Mo. West Applic. for CCNs to Construct Two Solar Gen. Facilities, No. EA-2024-0292 (July 31, 2025).

56. The Foxtrot Battery will not cross any other utility facilities, railroad tracks, or an underground facility. See CCN Rule (6)(B).

57. As Mr. Carlson explains, the Foxtrot BESS Project will consist of a group of specially designed outdoor-rated battery enclosures which will contain battery modules and supporting equipment. The battery modules, monitoring and safety equipment, cooling equipment, and controls will be assembled and tested at the factory, and then shipped to the Foxtrot site within the enclosures and their skid base. The enclosures will be placed on newly prepared foundations, to be interconnected to each other and then wired to transformers. The transformers will step up the 480 to 690-volt skid output to 34.5 kilovolts ("kV"). The 34.5 kV output will then be routed to the generator step-up transformers, increasing voltage to 161 kV before being interconnected to the 161 kV Asbury substation. The estimated costs for the complete scope of the construction of the Foxtrot BESS Project is **[redacted]** which excludes any allowance for funds used during construction. This amount will be financed through Evergy Missouri West's available resources with the intent that the prudent costs of the Foxtrot BESS Project will be included in rate base through the Commission's ratemaking and cost of capital procedures which Mr. Grace discusses in his direct testimony. See CCN Rule (6)(C).

58. The estimated beginning of construction for the Foxtrot BESS Project is March of 2027. The anticipated commercial operations date when the project will be in service is the fourth quarter of 2028. See CCN Rule (6)(D).

59. The Foxtrot BESS Project will utilize common equipment that is being constructed as part of the Foxtrot Solar project. The common equipment includes medium and high-voltage electrical equipment necessary for interconnection, some medium voltage switchgear and relaying, and the main power transformer and generator tie-line. Additionally, the Foxtrot BESS Project will

share the operations and maintenance building with the Foxtrot Solar Project. See CCN Rule (6)(E).

60. The Foxtrot BESS Project will be financed using Evergy Missouri West's existing debt and equity resources, similar to other capital investments made by EMW, as explained by Mr. Grace in his direct testimony. See CCN Rule (6)(F).

61. Evergy Missouri West's 100% ownership share of the Foxtrot BESS Project corresponds with the need for additional capacity of battery storage in 2029 identified in EMW's August Revised Resource Plan, as discussed in Mr. VandeVelde's testimony. See CCN Rule (6)(G).

62. Evergy issued its All-Source RFP in 2025 which generated several battery storage proposals with delivery dates in the 2028-2030 window, as Mr. Carlson explains in his testimony. After the Commission granted a CCN to Evergy Missouri West for the Foxtrot Solar Project in 2025, Evergy explored the feasibility of co-locating a BESS with Foxtrot Solar Project. This effort included whether either Evergy could take advantage of Southwest Power Pool's Surplus Interconnection Service ("SIS") which is available at the Foxtrot Solar Project site. The benefit of having SIS service at Foxtrot Solar Project is that the Foxtrot BESS Project would require no interconnection study or interconnection agreement, and would avoid any interconnection upgrade costs. Furthermore, the existing relationship between Evergy Missouri West and Invenergy Renewables regarding the construction of the Foxtrot Solar Project led EMW to conclude that proceeding with Foxtrot Invenergy on the Foxtrot BESS Project was the best course of action. Just as Evergy Missouri West intends to carry out the Build Transfer Agreement ("BTA") with Invenergy Renewables on the Foxtrot Solar Project, EMW will enter into a similar BTA with Foxtrot Invenergy for the Foxtrot BESS Project. See CCN Rule (6)(H).

63. When completed, the Foxtrot BESS Project will join Evergy Missouri West's generation fleet and will benefit from Evergy's extensive knowledge and experience gained from years of operating supply side facilities. EMW will provide more detailed operating and maintenance plans regarding Foxtrot BESS Project, pursuant to CCN Rule (6)(I), when they are available closer to the project's commercial operation date. Evergy Missouri West respectfully requests that the Commission grant a variance from this provision under 20 CSR 4240-2.060(4) and CCN Rule Section 3(C).

64. Evergy Missouri West also requests a variance from CCN Rule (6)(J) under 20 CSR 4240-2.060(4) and CCN Rule Section 3(C), so that it can provide plans for the restoration of safe and adequate service closer to the time that the Foxtrot BESS Project begins commercial operations in 2028.

65. There is no requirement for Evergy Missouri West to provide notice under CCN Rule (6)(K) because there are no electric transmission line routes or transmission substations proposed for the Foxtrot BESS Project that require notification to landowners who would be directly affected.

C. Public Convenience and Necessity under Section 393.170

66. As discussed under Section II(C) above, the Commission generally applies five criteria known as the Tartan factors to determine whether a proposed construction CCN is "necessary or convenient for the public service." See § 393.170.3; CCN Rule § (3)(A).[35] Evergy Missouri West provides the following facts that show granting a CCN for this project is "necessary or convenient for the public service."

[35] Tartan, No. GA-94-127, 1994 WL 762882 at 3 (1994).

1. There is a Need for the Foxtrot BESS Project

67. Assessing Evergy Missouri West's resource needs since the filing of its 2026 IRP Update on May 7, 2026, Evergy witness Cody VandeVelde's Direct Testimony, and EMW's August 2026 Revised Resource Plan explain why recent modeling and analysis conducted during the summer of 2026 concluded that EMW has a clear need for the capacity and stored energy of the Foxtrot BESS Project. Mr. VandeVelde discusses why the Foxtrot BESS Project fulfills Evergy Missouri West's need for capacity because EMW amended the energy supply agreement ("ESA") of a large load customer that was include in the 2026 Preferred Plan which increased its total peak demand by 75 MW beginning in winter 2028-29.

68. As discussed under Section II(C)(1), Evergy Missouri West's capacity need is based on SPP's higher resource adequacy requirements, as well as increased load growth in its service territory. The Foxtrot BESS Project is a low-cost, zero-carbon generation resource that furthers EMW's "all-of-the-above" approach to resource planning. The addition of this battery storage system will enhance grid reliability and flexibility because it is a dispatchable resource that will provide year-round capacity and energy. The Foxtrot BESS Project also supports the transition to cleaner energy resources without increasing carbon emissions which will allow EMW to retain current customers and to attract new customers who have clean energy goals or policies.

2. The Foxtrot BESS Project is Economically Feasible

69. As described in the direct testimonies of Mr. VandeVelde, Mr. Gunn, and Mr. Humphrey, Evergy Missouri West's decision to add this project to its resources is economically feasible as it will produce efficient, low-cost energy storage capacity in Missouri. As a resource scheduled to be in service by the fourth quarter of 2028, the Foxtrot BESS Project is expected to qualify for a 50% Section 48E federal investment tax credit (ITC), consisting of the 30% base credit plus a 10% bonus for locating in an "energy community" under the 2022 Inflation

Reduction Act and 10% credit by utilizing domestic content.[36] The ITC benefit will be received in the first year of operation and will reduce the project's effective capital cost by approximately 50%.[37] As a result, this storage project is economically competitive with alternative capacity resources on a net-cost basis.

70. As discussed by Mr. Carlson, the Foxtrot BESS Project provides unique economic advantages by allowing EMW to store excess energy during low-demand periods, especially during times of high solar output, and to discharge energy later in the day when demand is high when solar units are ramping down. Battery storage is particularly effective when paired with solar facilities. The Foxtrot BESS Project will reduce Evergy Missouri West's need to purchase higher-priced energy from the SPP energy markets during such times of high demand. This BESS facility can also provide stabilizing ancillary services, such as frequency regulation, voltage support, and spinning reserves, that will create potential revenue streams while enhancing grid stability. The rapid response capability of a BESS also reduces the risk of costly grid disruptions and outages. Finally, the Foxtrot BESS Project is economically feasible because it will directly and indirectly create Missouri jobs and produce Missouri tax revenues.

3. Evergy Missouri West is Able to Finance the Foxtrot BESS Project

71. As discussed above in Section II(C)(3) and in the direct testimony of Mr. Grace, Evergy Missouri West has the resources to generate and raise the capital necessary to finance the construction of the Foxtrot BESS Project, consistent with its ability to finance its share of the Buchanan Bluffs Energy Center Unit 2.

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[36] As Evergy witness John Grace discusses in his direct testimony, unlike the production tax credit for wind and solar resources, the ITC for battery storage is not subject to the accelerated phase-out of the 2025 federal budget reconciliation legislation, also known as the One Big Beautiful Bill Act. This ITC remains available for projects beginning construction before 2034. See 26 U.S. Code § 48E

[37] Mr. Grace discusses tax issues related to the Foxtrot BESS Project in Section IV of his direct testimony.

4. Evergy Missouri West is Qualified to Construct the Foxtrot BESS Project

72. As described in Section II(C)(4) and in the direct testimony of Mr. Humphrey and Mr. Carlson, Evergy Missouri West has extensive experience constructing and operating various types of electric generating and other facilities. EMW is qualified to construct and operate the Foxtrot BESS Project, given the technical operational and management experience that Evergy's utilities have accumulated over their many years as electrical corporations providing service to customers since the turn of the last century. Since 2022 Evergy Kansas Central has operated the 1 MW/5 MWh Switchgrass Battery Storage Pilot Project adjacent to the Sedgwick County Zoo in Wichita which was also developed by Invenergy. Additionally, Evergy Missouri Metro's predecessor Kansas City Power & Light Company oversaw the development in 2011-12 of a 1 MW/1 MWh battery storage system which EMW operated as part of its SmartGrid Innovation Park in midtown Kansas City, Missouri. Evergy Missouri West has built, owned, and operated an extensive portfolio of energy projects, including coal, natural gas, solar, and other facilities. Based on this experience, EMW has the knowledge and expertise to apply its knowledge and skills to the development, construction, and operation of a battery energy storage system like the Foxtrot BESS Project.

5. The Foxtrot BESS Project is in the Public Interest

73. Evergy Missouri West's 100% ownership of the Foxtrot BESS Project promotes the public interest because the facility will enhance the reliability, affordability, and sustainability of EMW's generation fleet. Battery systems like the Foxtrot BESS Project will help to manage increasing demand when utilized in an integrated marketplace like Southwest Power Pool. The Foxtrot BESS Project will be an essential part of Evergy Missouri West's long-term resource strategy, enabling it to reliably serve its existing and growing customer base, including large load

customers, while supporting Missouri's broader economic development objectives and delivering benefits to customers.

74. Granting a CCN to the Foxtrot BESS Project will also serve the public interest because EMW's current work with Invenergy Renewables on the Foxtrot Solar Project will produce synergies with its future work with Foxtrot Invenergy. In addition, the co-location of Foxtrot BESS Project next to Foxtrot Solar Project will allow the battery project to take advantage of the benefits of SPP's Surplus Interconnection Service, as discussed above. Awarding a CCN to the Foxtrot BESS Project is clearly in the public interest.

IV. Request for Section 393.190 Authority for the Foxtrot BESS Project

75. Under the terms of a Build Transfer Agreement ("BTA") that will be signed with Invenergy's Foxtrot Energy Storage Holdings LLC, EMW will acquire 100 percent of the membership interests in the Foxtrot BESS Project which it will then own. Immediately upon the closing of this acquisition, Evergy Missouri West will merge the Foxtrot BESS Project into EMW. Therefore, Evergy Missouri West requests that the Commission authorize EMW to consummate the asset purchase and any subsequent mergers under Section 393.190.1 and to find that such transactions are not detrimental to the public interest.[38]

76. Pursuant to Section (1)(A) of the Commission's filing requirements rule regarding mergers or consolidations, 20 CSR 4240-10.115 ("Merger Rule"), Evergy Missouri West will provide a copy of the proposed plan and agreement related to the merger of the Foxtrot BESS

[38] Once the Commission determines that a CCN should be granted, it authorizes the utility to carry out the project as described and, when necessary, approves a merger or acquisition under Section 393.190.1. See Order Approving Stip. & Agmt. and Granting Certificates of Convenience and Necessity at 5, In re Evergy Mo. West CCN Applic. for Two Solar Facilities, No. EA-2024-0292 (July 31, 2025); Order Approving Stip. & Agmt. and Granting CCN at 1, 5, In re Union Elec. Co., No. EA-2023-0286 (Mar. 21, 2024) (merger related to Split Rail solar project's build transfer agmt.); Report & Order at 13, 53, In re Empire Dist. Elec. Co. Applic. for CCN for Wind Gen. Facilities, No. EA-2019-0010 (June 19, 2019) (acquisition of Neosho Ridge Wind Project under purchase agmt.).

Project into EMW pursuant to the BTA, which is expected to be signed in the fourth quarter of 2026, as a late filed **Confidential Schedule** to the direct testimony of Evergy witness John Carlson. Organizational charts depicting the relationship of the merging entities before and after the transactions are shown in Figure 2 in Mr. Carlson's direct testimony.

77. Pursuant to Section (1)(B) of 20 CSR 4240-10.115, EMW has attached as **Confidential Schedule 1** a certified copy of the resolution of the board of directors of Evergy Missouri West authorizing the proposed merger associated with the Foxtrot BESS Project. Pursuant to Section 1(C) of the Commission's Merger Rule, the balance sheet and income statement of the Evergy Missouri West, both pre-merger and post-merger, are attached as **Confidential Schedule 2.**

78. Both the Application and the direct testimonies of Mr. Humphrey, Mr. VandeVelde, Mr. Carlson, and Mr. Gunn provide the reasons why the proposed merger is not detrimental to the public interest, pursuant to Section (1)(D) of the Merger Rule. The Application and the supporting direct testimony discuss the positive impact of the mergers on Evergy Missouri West's operations, pursuant to Section (1)(E) of the Merger Rule. With reference to Section (1)(F) of this rule, EMW does not believe at this time that the transactions will have a material impact on the tax revenues of any political subdivision in which Evergy Missouri West's structures, facilities, or equipment are located.

79. This request is consistent with the Commission's approval of EMW's solar generation projects being constructed using a BTA where it was "granted authority to engage in the transactions by which it will construct and finance the Projects as set out in the Agreement."[39]

[39] See Order Approving Stip. & Agmt. and Granting CCNs at 5, In re Evergy Mo. West CCN App. for Two Solar Generation Facilities, No. EA-2024-0292 (July 31, 2025). The Stipulation stated at page 2: "The Commission should grant EMW authority to enter into the proposed transactions and, in the case of the Foxtrot solar facility, authorize EMW to complete the transactions by which it will construct and finance the Foxtrot solar facility pursuant to the

V. Conclusion and Request for Approval

80. This Application seeks three CCNs under Section 393.170.1, one each for Evergy Missouri Metro and Evergy Missouri West regarding the Buchanan Bluffs Energy Center Unit 2, and one for Evergy Missouri West regarding the Foxtrot BESS Project. Each project will enhance the ability of the Companies to generate safe, reliable, and efficient electricity, as well as to meet the challenges of increased load growth and SPP resource adequacy requirements in a responsible and prudent manner.

81. As with any commercial transaction, there may be issues associated with implementing the BTA, transitioning the ownership of the Foxtrot BESS Project, and integrating it into Evergy Missouri West's operations. However, it is in the best interest of all parties to ensure that the benefits of the Foxtrot BESS Project will flow to Missouri customers in a timely manner.

82. Because the Companies cannot issue official Notices to Proceed ("NTP") on the Projects until they receive a final favorable order from the Commission, there is an increased risk that the Projects may not achieve their targeted commercial operations dates in time for when the IRP identified the assets are needed if a Commission Order cannot be issued on or before May 8, 2027. Therefore, Evergy Missouri Metro and Evergy Missouri West respectfully urge the Commission to issue a final order with an effective date no later than May 8, 2027, consistent with the proposed procedural schedule attached as Exhibit A.

WHEREFORE, Applicants respectfully request that the Commission:

(1) Grant Evergy Missouri Metro and Evergy Missouri West the Certificates of Convenience and Necessity, pursuant to Section 393.170.1 and the CCN Rule, 20 CSR 4240-20.045, that authorize them to construct, install, own, operate, maintain, manage and control the

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Build Transfer Agreement ('BTA') with Invenergy Renewables, LLC, and then immediately effect a short-form merger and consolidation of each Facility with and into EMW."

Buchanan Bluffs Energy Center Unit 2, along with all existing facilities, structures, fixtures, and other equipment related to this project;

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

(3) Grant the Evergy Missouri West the authority and permission under Section 393.190 to complete the asset transfers and mergers described in the Application regarding the Foxtrot BESS Project, and find that the completion of the asset transfer and merger is not detrimental to the public interest;

(4) Grant variances from 20 CSR 4240-20.045(3)(C), (6)(I), and (6)(J) so that an overview of the Applicants' plans to operate and maintain the Projects, and their plans for restoration of safe and adequate service can be provided closer to the time when each Project will commence commercial operations;

(5) Find that the Applicants' respective decisions to construct, operate, own, manage, maintain, and control the Projects are prudent under Section (2)(C) of the CCN Rule;

(6) Determine in this Section 393.170 proceeding the amount of construction work in progress (CWIP) that may be included in rate base for the Buchanan Bluffs Energy Center Unit 2, pursuant to Section 393.135.2(1);

(7) Order a prehearing conference to occur immediately after the deadline for intervention applications expires so that a procedural schedule is established consistent with the Applicants' request that a Commission decision occur in a timely fashion which grants the relief sought;

(8) Issue its Report and Order with an effective date no later than May 8, 2027;

(9) Direct the Commission’s Data Center to revise the name of this proceeding to reflect the style on page 1 of this Application, given that the Companies no longer seek a CCN for “Solar Electrical Production Facilities,” as was stated in the style of their Notice of Intended Case Filing submitted on June 1, 2026.

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

Respectfully submitted,

/s/ Roger W. Steiner

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Attorneys for Evergy Missouri Metro and Evergy Missouri West

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon Counsel for the Staff of the Commission and the Office of the Public Counsel for all parties on August 31, 2026, by EFIS filing and notification, and/or e-mail.

|s| Roger W. Steiner

Attorney for Evergy Missouri Metro and Evergy Missouri West

VERIFICATION

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

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

Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.

Kevin D. Gunn

____
Kevin D. Gunn

Subscribed and sworn before me this 31st day of August 2026.

____
Notary Public

My commission expires: April 26, 2029

ANTHONY R WESTENKIRCHNER
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 26, 2029
PLATTE COUNTY
COMMISSION #17279952

SCHEDULES 1 and 2
CONTAIN CONFIDENTIAL
INFORMATION
NOT AVAILABLE TO THE PUBLIC.

ORIGINALS FILED UNDER SEAL.

EA-2026-0343 Exhibit A Proposed Procedural Schedule

Milestone	Revised Date
Filing Date	**August 31, 2026**
Discovery Conference	October 2, 2026
Discovery Conference	October 26, 2026
Settlement Positions	November 2, 2026
1st Settlement Conference	November 12, 2026
Local Public Hearing	November 16, 2026
Staff Report and Intervenor Rebuttal	December 4, 2026
Settlement Positions Exchanged	December 10, 2026
2nd Settlement Conference	December 16, 2026
Testimony to Support Settlement	December 21, 2026
Settlement on-the-record	January 6, 2026
Surrebuttal/Cross-surrebuttal	January 11, 2027
List of Issues, Order of Cross	January 15, 2027
Discovery Cut-Off	January 15, 2027
Position Statements	January 22, 2027
Evidentiary Hearing	February 1-3, 2027
Initial Briefs	March 1, 2027
Reply Briefs	March 29, 2027
Report & Order (requested)	April 28, 2027
Effective Date (10 days after Order)	May 8, 2027

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

Docket No.: EA-2026-0343
Date: August 31, 2026

CONFIDENTIAL INFORMATION

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

Document/Page	**Reason for Confidentiality from List Below**
Application, p. 9, ¶16	3, 4, and 6
Application, p. 19, ¶42	3, 4, and 6
Application, p. 24, ¶57	3, 4, and 6
Confidential Schedule 1	6
Confidential Schedule 2	3, 4, and 6

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

1. Customer-specific information;

2. Employee-sensitive personnel information;

3. Marketing analysis or other market-specific information relating to services offered in competition with others;

4. Marketing analysis or other market-specific information relating to goods or services purchased or acquired for use by a company in providing services to customers;

5. Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public;

6. Strategies employed, to be employed, or under consideration in contract negotiations;

7. Relating to the security of a company's facilities; or

8. Concerning trade secrets, as defined in section 417.453, RSMo.

9. Other (specify) ____.

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