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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EA-2026-0343

DIRECT TESTIMONY

OF

JOHN CARLSON

ON BEHALF OF

EVERGY MISSOURI METRO & EVERGY MISSOURI WEST

Kansas City, Missouri

August 2026

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DIRECT TESTIMONY

OF

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Case No. EA-2026-0343

I. INTRODUCTION

Q: Please state your name and business address.

A: My name is John Carlson. My business address is 1200 Main Street, Kansas City, Missouri 64105.

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

A: I am employed by Evergy Metro, Inc. and serve as Director – Project Management & Controls for Evergy Metro, Inc. (“Evergy Metro”) d/b/a Evergy Missouri Metro (“Evergy Missouri Metro” or “EMM”), Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West” or “EMW”), 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” or “EKC”), the operating utilities of Evergy, Inc. (“Evergy”).

Q: Who are you testifying for?

A: I am testifying on behalf of Evergy Missouri Metro and Evergy Missouri West (collectively, the “Applicants”).

Q: What are your responsibilities?

A: My responsibilities include oversight of the Renewables Project Management team who are responsible for the project management and delivery of renewable generation assets for

1 the Applicants. Additionally, I oversee early-stage development and the team responsible
2 for project controls, namely the tracking of scope, cost, and schedule for both conventional
3 and renewable generation additions across Evergy's companies.

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

5 A: I received a Bachelor of Science degree in architectural engineering from the University of
6 Kansas in 1997. In 2004, I received a master's in business administration from the
7 University of Chicago Booth School of Business. I joined Evergy in 2006 as an Energy
8 Consultant in the Delivery Division, managing all facets of the customer relationship for
9 Evergy's large industrial customers. In 2007, I became Manager of Market
10 Competitiveness where I was responsible for developing and implementing non-regulated
11 products and services for residential, commercial, and industrial customers. In 2010, I
12 moved to the Supply Division at Evergy and started as an Originator of wholesale power
13 transactions. In 2017, I started working in market operations and managed the group
14 responsible for submitting assets and load to the Southwest Power Pool ("SPP") daily. In
15 early 2024, I moved into the Applicants' Development group where I manage a team
16 responsible for project management of renewable generation projects and project controls
17 for new renewable and conventional generation.

18 **Q: Have you previously testified in a proceeding at the Commission or before any other**
19 **utility regulatory agency?**

20 A: Yes. Most recently, I submitted supporting testimony in Evergy Missouri West's
21 Certificate of Convenience and Necessity ("CCN") request for two solar facilities in No.
22 EA-2024-0292. I previously provided testimony in multiple dockets including Evergy's
23 CCN case in support of the acquisition of a percentage ownership in the Dogwood Energy

1 generation asset, the Missouri Energy Efficiency Investment Act proceeding in No. EO-
2 2020-0227 and various rate case proceedings before this Commission.

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

4 A: The purpose of my direct testimony is to:

- 5 ▪ Provide an overview of the approximately 109 MW Foxtrot battery energy storage
6 system (“BESS”) project (“Foxtrot BESS”) to be located at the Foxtrot Solar
7 Facility in Jasper County, Missouri, and owned 100% by Evergy Missouri West;
- 8 ▪ Describe the process that led to the purchase of the project;
- 9 ▪ Review the commercial negotiations, transaction structure, and risk mitigation
10 associated with the facility, and describe its proposed in-service criteria;
- 11 ▪ Describe project controls including Evergy’s and third parties’ processes, schedule
12 coordination, and reporting for all requested assets in the Application – (1) the
13 Foxtrot BESS, and (2) an approximately 710-megawatt (“MW”) advanced class
14 combined-cycle gas turbine (“CCGT”) electric generating plant known as the
15 Buchanan Bluffs Energy Center Unit 2,¹ to be located in Buchanan County,
16 Missouri, and to be owned 50% by EMM and 50% by EMW (collectively, the
17 “Projects”); and
- 18 ▪ Discuss Evergy’s Strategic Governance Framework and the role of the Executive
19 Oversight Committee.

¹ Evergy witness J Kyle Olson provides a detailed description of the Buchanan Bluffs Energy Center Unit 2 in his direct testimony.

1 **Q: Please provide an executive summary of your testimony.**

2 A: I first describe the Foxtrot BESS facility, an approximately 109 MW battery energy storage
3 facility which is being developed by Foxtrot Energy Storage LLC (“Foxtrot Invenergy”),
4 an affiliate of Invenergy, Inc. (“Invenergy”). Foxtrot BESS will be built by an engineering,
5 procurement and construction (“EPC”) contractor hired by a yet to be determined
6 Invenergy entity. The project has a targeted commercial operation date in the fourth quarter
7 of 2028. Evergy Missouri West needs the project to add accredited capacity to its portfolio
8 consistent with its 2026 Integrated Resource Plan (“IRP”) Annual Update and August 2026
9 Revised Resource Plan, as well as to provide large load customers with sufficient energy.
10 I discuss the process that led to the Foxtrot BESS build transfer agreement (“BTA”), the
11 anticipated transaction structure and financing, and the facility’s proposed in-service
12 criteria and risk-mitigation measures. In my testimony, I also describe the Applicants’
13 structured project controls framework for managing large-scale generation construction
14 projects, focusing on disciplined oversight of scope, schedule, cost, and risk. I explain how
15 standardized tools, defined roles, regular reporting, and formal change management are
16 integrated with internal governance and executive review. Overall, my testimony supports
17 that Evergy’s layered controls and oversight processes promote accountability, risk
18 mitigation, and prudent project execution.

19 **Q: Are you sponsoring any schedules with your direct testimony?**

20 A: Yes, I am sponsoring the following schedules:

- 21 ▪ Confidential Schedule JC-1 – Foxtrot BESS Cost Estimate
- 22 ▪ Schedule JC-2a – 2025 All-Source RFP Document
- 23 ▪ Schedule JC-2b – 2025 All-Source RFP Scoring Criteria

II. FOXTROT BESS PROJECT

Q: Please provide a detailed overview of the Foxtrot BESS project.

A: Foxtrot BESS project is an approximately 109 MW four-hour lithium-ion battery energy storage facility located in Jasper County, Missouri, on the same site as the Foxtrot Solar Project, which was granted a CCN by the Commission in Case No. EA-2024-0292. Foxtrot will consist of outdoor-rated battery enclosure skids containing battery modules and supporting equipment. The battery modules, monitoring and safety equipment, cooling equipment, and controls are assembled and tested at the factory and shipped to site within the enclosure, allowing each skid to be immediately ready for installation. The battery skids will be placed on newly installed foundations, interconnected appropriately to inverters and wired to transformers. The transformers will step up the 480 to 690-volt inverter output voltage to 34.5 kilovolts (“kV”). The 34.5 kV output will then be routed to the main power transformer (“MPT”), increasing voltage to 161 kV before being interconnected to the 161 kV Asbury substation. Technical specification and site layout are provided as exhibits to the Build-Transfer Agreement (“BTA”) which will be late-filed with the Commission after it is signed. The facility will be monitored and controlled through EMW’s supervisory control and data acquisition (“SCADA”) system allowing for remote charging or dispatch.

The project is being developed by Foxtrot Invenergy and is projected to start construction with a full notice to proceed in May 2027 and then go into commercial operation in the fourth quarter of 2028. A limited notice to proceed will be required in March 2027 to allow Foxtrot Invenergy to begin long lead material procurement. The interconnection will occur via Southwest Power Pool's ("SPP") Surplus Interconnection

1 Service, a process to add a new resource behind an existing interconnection position. In
2 this case, the existing interconnection position is the Foxtrot Solar project, interconnecting
3 at the 161 kV Asbury substation. There will be no SPP network upgrades associated with
4 the Foxtrot BESS.

5 **Q: What experience does Evergy Missouri Metro have developing and operating**
6 **a BESS facility?**

7 A: While Foxtrot BESS Project will be EMW's first utility-scale BESS facility, Evergy
8 Kansas Central, Inc. currently has a 1MW/5MWh BESS located in Sedgwick County,
9 Kansas. This project was also developed by Invenergy and has served the company as a
10 pilot deployment, from which we have developed a deeper operating and maintenance
11 understanding. Additionally, Evergy Missouri Metro developed a 1 MW/1MWh BESS as
12 part of the former Kansas City Power & Light's SmartGrid Innovation Park in Kansas City,
13 MO.

14 EMW has extensive experience developing and operating utility-scale generation
15 and related supply side facilities. As noted above, EMW has engaged Invenergy to develop
16 the Foxtrot BESS Project through a build transfer agreement ("BTA"). Invenergy has
17 significant experience developing BESS facilities with 27 projects developed in North
18 America and another 150+ projects in their pipeline, and broad experience developing over
19 230 wind, solar, natural gas and storage projects worldwide.

20 **Q: What process did Evergy Missouri West pursue to identify the need for the Foxtrot**
21 **BESS Facility?**

22 A: As more thoroughly described in the testimony of Cody VandeVelde (Senior Director of
23 Strategy and Long-Term Planning), Evergy Missouri West identified the need for this

1 resource through the August 2026 Revised Resource Plan to EMW’s 2026 IRP Annual
2 Update which identified approximately 150 MW of battery storage to be added by 2029.
3 The Project is being pursued to add accredited capacity to help address this capacity need,
4 as well as to provide the operational responsiveness and flexibility during high and critical
5 peak periods. Foxtrot BESS will also help EMW manage grid constraints and outages
6 caused by severe weather events.

7 **Q: Once the IRP identified the need, how did EMW assess the economic feasibility of a**
8 **BESS resource?**

9 A: Evergy evaluated the economic feasibility of a BESS resource by examining multiple
10 sourcing pathways, including Request for Proposal (“RFP”) offers, self-development at
11 existing sites, and standalone self-development. The 2025 All-Source RFP (“All-Source
12 RFP”) generated several battery storage proposals with delivery dates in the 2028-2030
13 window. These included standalone and co-located solar plus configurations. Co-locating
14 battery storage at existing generation or substation sites was also evaluated. Co-location
15 can reduce development timelines by avoiding the need for new substation and
16 transmission equipment. Evergy also evaluated standalone sites which provide flexibility
17 but require full interconnection and may face longer development timelines. Through this
18 process, Evergy identified the Foxtrot BESS as a complimentary asset, co-located with the
19 Foxtrot Solar project, that further meets the needs of our customers.

20 **Q: How was the All-Source RFP administered and distributed?**

21 A: Evergy partnered with consultants from 1898 & Co. to develop, administer, and distribute
22 a competitive RFP process, seeking projects interconnected within the SPP. As a first step
23 to this process, 1898 & Co. was tasked with identifying clear RFP goals and objectives.

1 These goals and objectives included definitions of quantitative and qualitative evaluation
2 criteria, developing a screening process to eliminate non-complying proposals before the
3 evaluation phase, use of a levelized costing approach to ensure an apples-to-apples cost
4 comparison between project submissions, and creation of a criteria weighting system to
5 accurately reflect Evergy's requirements for project selection. Next, in coordination with
6 Evergy, 1898 & Co. developed the RFP document and technical specifications. The final
7 RFP documents allowed for bidders to submit proposals utilizing nearly any type of energy
8 resource that is available in the market, including thermal generation, distributed energy
9 resources ("DER" or "DERs"), renewable generation, and energy storage. The RFP also
10 allowed for a variety of deal structures, including BTAs, power purchase agreements
11 ("PPA"), and development asset sales ("DAS"). These RFP documents were posted to a
12 standalone RFP website, which allowed developers to submit their proposals, ask
13 questions, and receive notifications about the RFP process. The RFP event was officially
14 launched on May 6, 2025. In addition to the standalone RFP website, 1898 & Co.
15 formulated a list of industry contacts, gathered from previous utility RFP's that they have
16 facilitated, and issued notification of the Evergy All-Source RFP event to those potential
17 interested parties. The flexibility built into the final RFP document and administration
18 process aligned with Evergy's goal of casting a wide net, which ensured that all possible
19 projects and interested parties were considered in the pursuit of satisfying the need
20 identified in the 2025 IRP. The full set of RFP documents are available in Schedule JC-2a,
21 and the RFP scoring matrix used to rank the RFP responses is shown in Schedule JC-2b.
22 The RFP process followed the schedule shown below.

FIGURE 1: RFP Process

Milestone	Completed By Date
Issue RFP	May 6, 2025
Submit Appendix A and B with intent to bid	May 27, 2025
Pre-bid conference	June 4, 2025
Submit all questions	June 24, 2025
Bids and payments due	July 16, 2025
Shortlist selected	August 8, 2025
Final negotiations complete	At Evergy's Discretion

Q: Please describe the responses to the RFP?

A: EMW received valid responses to the RFP from 31 developers, who offered approximately 209 different project constructs. These offers included (1) early-stage development where land leases and potential interconnection queue positions could be purchased via a development asset sale, (2) BTA options, (3) PPA options, and (4) existing operational project sites. Many developers offered the same project via multiple deal structures. The projects offered had various commercial operation dates (“COD”) ranging from April of 2020 (an existing operating asset) to December of 2032. See Confidential Schedule JC-3 for the RFP bid responses and final scoring.

Q: How did Evergy evaluate the RFP responses?

A: 1898 & Co. assisted Evergy in developing scoring criteria and ranking the projects submitted to the RFP. This evaluation process consisted of three steps: (1) an initial screening evaluation to ensure compliance with RFP documents and/or to eliminate projects where feasibility or cost issues may disqualify the proposal, (2) a quantitative analysis of the bids utilizing a levelized cost of energy (“LCOE”) and levelized cost of

1 capacity (“LCOC”) approach, and (3) a qualitative analysis to evaluate non-cost attributes
2 of the proposals, such as environmental risk, interconnection queue status, land control
3 status, technical merit, and developer experience and financial surety plan. After evaluation
4 and ranking of the submitted proposals, the list was narrowed down to short-listed
5 candidates, who were then requested to provide best and final offers. Following receipt and
6 evaluation of the best and final offers, final short-listed candidates were selected to move
7 forward with detailed evaluation and possible negotiations. The proposal requirements and
8 scoring criteria are more thoroughly detailed in Schedule JC-2a, while the weighted scoring
9 matrix used to evaluate and rank proposals is detailed in Schedule JC-2b. The scorecard
10 which applied the weighted scoring criteria to each proposal is detailed in Confidential
11 Schedule JC-3.

12 **Q: Did Evergy Missouri West evaluate interconnection processes and issues for the**
13 **facility?**

14 A: Yes, it did. There are no interconnection issues or network upgrades associated with
15 Foxtrot BESS since it is a surplus storage project and will interconnect on the SPP
16 transmission system at the existing Foxtrot Solar site.

17 **Q: What are the benefits of surplus interconnection?**

18 A: SPP’s Surplus Interconnection Service (“SIS”) creates a path for existing generating
19 facilities to use remaining headroom at their respective points of interconnection under the
20 terms of their Generation Interconnection Agreement (“GIA”). Because the
21 interconnection is already approved for a set capacity amount, connecting incremental
22 capacity that does not exceed the GIA does not require network upgrades. This results in
23 a timely and cost-efficient path to deploy new capacity.

1 **III. COMMERCIAL NEGOTIATIONS AND RISK MITIGATION**

2 **Q: Why did Evergy begin commercial negotiations with Invenergy regarding Foxtrot**
3 **BESS?**

4 A: The Foxtrot BESS project was submitted to Evergy by Invenergy after Evergy’s 2025 All-
5 Source RFP. In 2025 and 2026, Evergy’s IRP process identified the need for a BESS
6 resource. In consideration of the unique siting and interconnection characteristics of
7 Foxtrot BESS, the low permitting and environmental risks, the project’s development
8 maturity, its capacity cost (on a \$/kW basis) and its levelized cost of capacity (“LCOC”)
9 comparing favorably to offers submitted in the RFP, Evergy entered discussions with
10 Invenergy to purchase the Project.

11 **Q: What is the timeline for commercial negotiations for Foxtrot BESS?**

12 A: Material negotiations for Foxtrot BESS began in May 2026 when Evergy
13 and Invenergy began negotiating a transaction term sheet. This document is effectively a
14 summary of the commercial terms and conditions to be addressed in a final contract.
15 Negotiating a term sheet prior to the contract presumably saves time as most of the
16 commercial items have been addressed. Topics such as the project capacity, transaction
17 purchase price, payment schedule, closing conditions, transmission interconnection,
18 project development and construction (if applicable), warranties, procurement (if
19 applicable), and definitions are included in the term sheet. The Foxtrot BESS term sheet
20 was agreed to by both parties in July 2026. Contract negotiations started at that time and
21 will result in a signed BTA agreement in the 4th quarter of 2026.

1 **Q: What is the purchase price and plans for financing the purchase and operation of the**
2 **Foxtrot BESS project?**

3 A: The base BTA purchase price of the Foxtrot BESS Project is ****[REDACTED]****. The total
4 construction cost of Foxtrot is estimated to be ****[REDACTED]**** (see Confidential
5 Schedule JC-1), which is inclusive of the BTA purchase and Evergy internal labor & fees.

6 Evergy witness John Grace (Senior Director, Corporate Planning and Financial
7 Performance) addresses how the Company plans to finance the Project.

8 **Q: Are investment tax credit (“ITC”) benefits available for the facility?**

9 A: Yes. Mr. Grace describes the available tax credits for Foxtrot BESS and how Evergy
10 Missouri West is accounting for them.

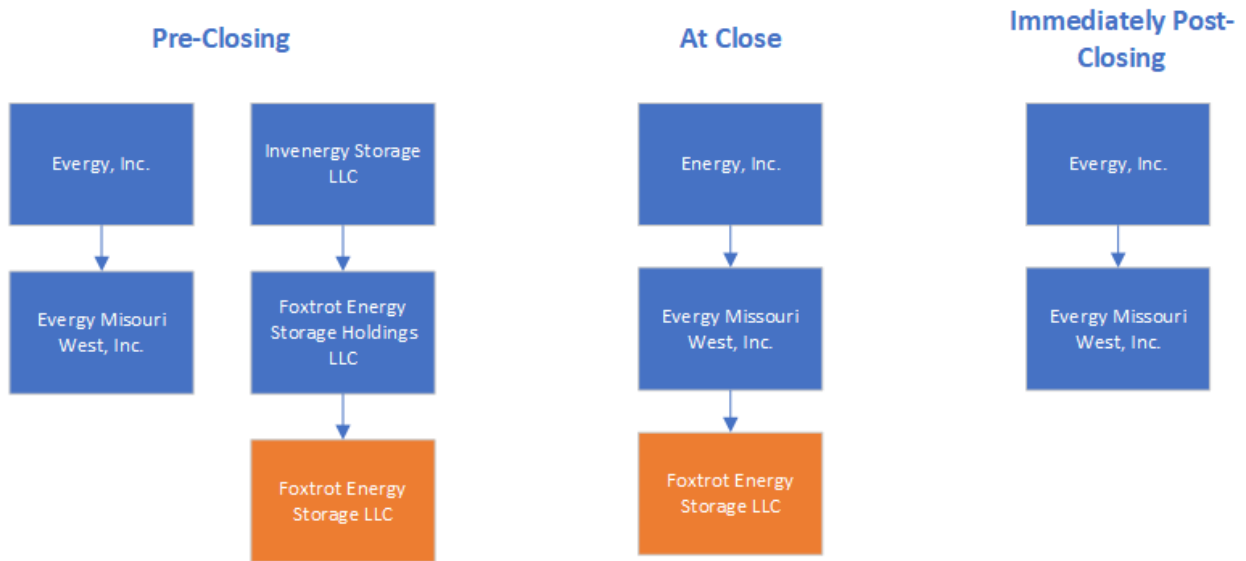
11 **Q: How will the acquisition of Foxtrot BESS be structured?**

12 A: As stated above, the Foxtrot BESS acquisition has been structured as a BTA or build
13 transfer agreement. This transaction has both acquisition agreement and construction
14 contract portions. Invenergy is responsible for securing land rights, permits,
15 interconnection rights, approval from local jurisdictions, and required engineering, land,
16 and water studies of the site. Once the development work and a contract have
17 been finalized, the project goes into the construction phase. Invenergy (or its contractors)
18 will then procure all necessary material, design and build the project (in the case

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1 of Foxtrot, Invenergy will hire a contractor for this work). The following are pre- and post-
2 closing organizational charts of the transaction.

3 **FIGURE 2: Foxtrot BESS Organizational Chart**



4

5 **Q: When will Foxtrot BESS be transferred to Evergy Missouri West?**

6 **A:** The equity interest in Foxtrot Energy Storage LLC (the Foxtrot BESS project company)
7 and associated development assets will be owned by EMW upon closing at the time of the
8 notice to proceed (“NTP”). Upon or immediately following NTP, EMW will effect a short-
9 form merger of Foxtrot Invenergy with and into EMW, with EMW surviving the merger.
10 As a result, the assets of the project company Foxtrot Energy Storage LLC will be
11 consolidated with those of EMW. The Invenergy parent company will maintain
12 performance obligations throughout the construction of Foxtrot BESS to facilitate
13 purchasing and contracting on behalf of the project.

1 **Q: Has the Foxtrot BESS Project transaction been evaluated from a technical**
2 **standpoint?**

3 A: Yes, Evergy’s internal engineering team has reviewed the technical data, asset life design,
4 engineering specifications, approved suppliers, and site plans provided by the developers
5 of the Foxtrot BESS Project. Due to the current stage of development, technical
6 information will continue to be developed as the site matures and Issued For Construction
7 (“IFC”) packages are developed. Prior to executing the BTA for Foxtrot, EMW’s
8 engineering team performed a thorough review and approved the technical scope of work
9 and basis of design to ensure that the Project was aligned with EMW’s expectations for a
10 utility scale BESS. EMW’s technical team will continue to stay involved throughout to
11 ensure that the contract is followed, and the development is of utility grade quality.

12 Technical reviews completed thus far have primarily focused on ensuring technical
13 alignment with Evergy standards and specifications, including technical diligence of the
14 potential BESS Original Equipment Manufacturers (“OEM”) that could be utilized. Evergy
15 Missouri West’s engineering review found the developer’s BESS OEM list to be sufficient
16 and EMW requested the necessary modifications to ensure the scope aligned with Evergy’s
17 standards.

18 **Q: Were environmental and permitting concerns evaluated for the facility?**

19 A: The Foxtrot BESS project is in Jasper County, Missouri, which is an un-zoned county.
20 Invenergy previously obtained a “letter of no zoning” signed by the county commissioners
21 stating that no local permits are required, and that still stands. The Company’s internal
22 environmental experts reviewed project documentation submitted by Invenergy and found
23 no major concerns with the project.

1 **Q: Will the Foxtrot BESS project impact any existing utilities?**

2 A: No, the Foxtrot BESS project will not cross any existing utility facilities, railroad tracks,
3 or underground facilities.

4 **Q: What common plant will be constructed or utilized as part of the Foxtrot BESS**
5 **construction?**

6 A: No common plant will be constructed as part of the Foxtrot BESS project. However,
7 Foxtrot BESS will utilize common equipment that is being constructed as part of the
8 Foxtrot Solar project, also owned by Evergy Missouri West. This common equipment to
9 be utilized includes medium and high-voltage electrical equipment necessary for
10 interconnection. Some medium voltage switchgear and relaying, as well as the main power
11 transformer and generator tie line will be shared with Foxtrot Solar. Additionally, Foxtrot
12 BESS will utilize the operations and maintenance building that is being constructed as part
13 of the Foxtrot Solar project.

14 **Q: What are the proposed in-service criteria for Foxtrot BESS?**

15 A: The in-service criteria for the Foxtrot BESS will be the following:

- 16 1. All major construction work is complete.
- 17 2. All pre-operational tests have been successfully completed.
- 18 3. The facility successfully meets contract operational guarantees that are necessary
19 for satisfactory completion of all other items in this list.
- 20 4. The facility demonstrated the ability to stop and start both charging and discharging
21 when commanded to do so at a location from which it is normally operated.

1 5. The facility shall meet at least 95% of the guaranteed accredited capacity based on
2 the capacity test as outlined in the EPC contract, or liquidated damages have been
3 received for any shortfall below the guaranteed capacity.

4 6. Sufficient transmission/distribution interconnection facilities shall exist for the total
5 plant design net electrical capacity at the time Foxtrot BESS is declared fully
6 operational and used for service.

7 **Q: When will the plans for safe and adequate service for the facility be provided?**

8 A: Every Missouri West will provide the plans for restoration of safe and adequate service
9 within 60 days post-commercial operation of the facility. As discussed above regarding
10 Foxtrot BESS meeting the in-service criteria, plans for restoration of safe and adequate
11 service will not be complete until final equipment installation, and discussions between
12 EMW operations personnel and the facility's contractors and equipment vendors.

13 **Q: What are the overall project risks for Foxtrot BESS?**

14 A: As with all major construction projects, there are risks associated with the Projects.

15 The primary risks associated with the Project are:

- 16 1. Supply chain and procurement;
17 2. Change in law/tariff;
18 3. Construction

19 **Q: How does Every Missouri West plan to mitigate specific supply chain and**
20 **procurement risks?**

21 A: Global supply chains continue to be affected by strong demand for battery storage,
22 inverters, and power equipment (e.g., transformers and breakers). In addition, some of the
23 raw materials (lithium in particular) used in manufacturing BESS equipment is also used

1 by the data center and artificial intelligence industries, creating strong demand for them.
2 These factors all point to longer lead times and increased costs for equipment. The Foxtrot
3 BESS BTA was structured with provisions to reduce supply chain risks at multiple levels.

4 ** [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED] **

9 **Q: Please elaborate on change in law/tariff risks and how EMW has responded.**

10 A: For Foxtrot, ** [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED] **

16 **Q: What construction risks exist and how is EMW mitigating them?**

17 A: The construction labor market to build battery projects is tight due to increased demand for
18 power plant construction workers, and the labor is more expensive due to both the demand
19 and higher inflation relative to historical averages. Additionally, the overall general high
20 demand for construction puts schedule risk in play as more projects vie for less resources.

21 Everygy has transferred these risks to Invenergy and their EPC contractor through
22 the BTA. This agreement transfers the responsibility and obligation to the developer or
23 contractor to supply labor, equipment, and manage construction activities to meet the

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1 project's schedule milestones. Further, there are liquidated damages provisions in the BTA
2 with Invenenergy that address delays in meeting project milestones.

3 **Q: How do recent changes in federal law and policy affect the Foxtrot BESS facility and**
4 **its procurement?**

5 A: As noted in Section 12.4.2 of the May 2026 IRP Update filed by EMM, under the 2025
6 federal budget reconciliation legislation known as the One Big Beautiful Bill Act
7 ("OBBA"), resource developers are subject to stricter criteria to qualify projects that source
8 parts and components from Foreign Entities of Concern ("FEOC"). Evergy's tax team is
9 monitoring the evolving FEOC guidance to ensure that the Evergy Missouri West's storage
10 procurement strategy allows it to qualify for the investment tax credits which continue to
11 be available to projects like Foxtrot BESS under the OBBA.

12 **Q: What is the operations plan for Foxtrot BESS once it is in service?**

13 A: The operations plan for Foxtrot BESS will be provided within 60 days after commercial
14 operation of the project. At this time vendors for major equipment have not been finalized
15 so any operations plan would not be complete. Evergy operations personnel will work with
16 contractors and vendors when the Project is nearing completion to verify specific
17 operational characteristics of systems and to finalize the operations plans.

18 **IV. PROJECT CONTROLS OVERVIEW**

19 **Q: What are project controls for large construction projects?**

20 A: Project controls for large construction projects refer to the processes, tools and techniques
21 used to plan, monitor, and manage cost, schedule, and scope throughout the project
22 lifecycle. These help the project team ensure that the project stays on track and on budget
23 and meets its objectives.

1 **Q: What are the key components of an effective project controls plan?**

2 **A:** The six main areas of focus with project controls are cost, schedule and scope controls, risk
3 management, reporting and communication, and tools and technology. Below is a
4 description of each of these key components:

5 1. Cost Control – Includes the development of project budgets, the tracking of actual
6 costs against the project budget, the forecasting of future costs based on current
7 activity and trends, and change management which includes the evaluation of cost
8 impacts from scope changes.

9 2. Schedule Control – Deals with the creation of a detailed project timeline and
10 milestones (baseline schedule), critical path analysis by identifying tasks that
11 directly impact project completion, and schedule forecasting by predicting delays
12 and proactively adjusting plans.

13 3. Scope Control – Includes defining deliverables, tasks and those individuals who are
14 responsible for managing and tracking scope changes to protect against scope
15 creep, and for keeping accurate records of scope changes and decisions made.

16 4. Risk Management – Deals with recognizing and documenting project risks early,
17 and continually updating as new risks arise, developing strategies to minimize their
18 impact, and forming contingency plans for unforeseen events.

19 5. Reporting & Communication – Includes the reporting of project performance and
20 metrics to key stakeholders on a timely basis and is applicable to both contractors
21 and project owners. This component also includes effective communication and
22 coordination between all teams, internal and external, who are working on a project.

1 6. Tools and Technology – Includes the systems used to help track scope, schedule
2 and cost on projects such as Oracle Primavera P6 for project scheduling; Oracle
3 PeopleSoft and Microsoft Excel for financial information and data manipulation,
4 respectively; and other developed systems for tracking project performance.

5 **V. EVERGY’S PROJECT CONTROLS ORGANIZATION**

6 **Q: What is Evergy’s overall project controls approach for the Buchanan Bluffs Energy**
7 **Center Unit 2 and Foxtrot BESS Projects?**

8 A: As discussed by Mr. Olson, regarding Buchanan Bluffs Energy Center Unit 2, Applicants’
9 approach regarding Buchanan Bluffs Energy Center Unit 2 is built around a coordinated
10 owner’s engineer (“OE”), the power island equipment (“PIE”) manufacturer, and the
11 engineering, procurement, and construction (“EPC”) contractor model. Evergy applies a
12 “design once, build many” philosophy to promote schedule and cost discipline. This is
13 consistent with the approach that the Commission approved on July 31, 2025, in No.
14 EA-2025-0075 for three natural gas generation facilities. The focus is on standard,
15 repeatable designs that encourage efficiency and cost discipline throughout Buchanan
16 Bluffs Energy Center Unit 2’s lifecycle. This approach is intended to ensure regulatory
17 prudence and risk oversight, as well as alignment with strategic and regulatory
18 requirements.

19 The Foxtrot BESS project is built around a BTA structure where coordination
20 occurs between Evergy and Invenergy as the developer, and the EPC contractor once they
21 have been selected. Evergy reviews engineering drawings and submittals during the design
22 phase, provides expertise in procurement of the transformer and breakers for the project,

1 while tracking procurement of other materials by Invenergy, and engages in project
2 supervision during the construction phase.

3 Additional project controls, for both projects, are in place to support regulatory
4 prudence determination and risk oversight, as well as the use of multi-tiered review and
5 validation processes involving both internal and external experts.

6 **Q: Please describe Evergy's Generation Development project controls team, including**
7 **the role of Project Controls Analysts ("PCAs"), Project Managers ("PMs"), Project**
8 **Supervisors, and Construction Supervisors.**

9 A: Evergy's Generation Development project controls team is currently made up of a manager
10 and three PCAs. However, the project controls process is broader than the project controls
11 team and is engrained in all project work.

12 Project Controls Analysts are critical members of the Generation Development
13 team, responsible for the comprehensive oversight of project controls, including scope,
14 schedule, and budget management for the Buchanan Bluffs Energy Center Unit 2 and the
15 Foxtrot BESS projects. Each PCA is assigned to a specific project and works closely with
16 the PM, the Project Supervisor (Buchanan Bluffs Energy Center Unit 2) or Construction
17 Supervisor (Foxtrot BESS), and the rest of the construction teams to ensure that project
18 objectives are met and that all project controls processes are followed. The PCA
19 participates in weekly internal project meetings to discuss project status, issues, budgets,
20 purchase orders, and upcoming milestones, as well as in weekly and monthly meetings
21 with the EPC contractor or developer to review progress and address concerns. The PCA
22 is also responsible for developing monthly and quarterly regulatory reports for state utility
23 commissions, which involves summarizing updates from the EPC contractor or developer,

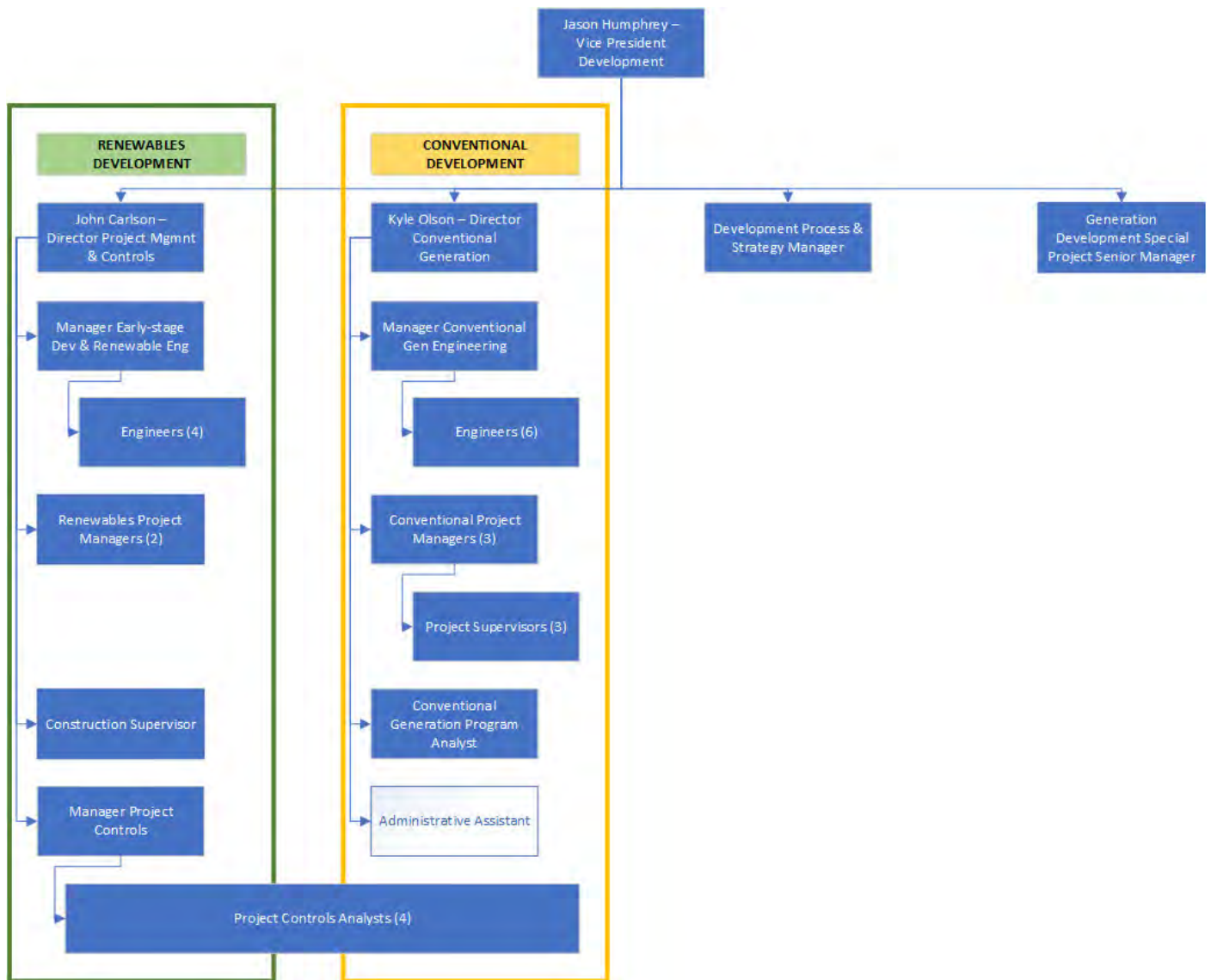
1 Project Managers, Engineers, and Project and Construction Supervisors, and providing
2 financial updates for those reports. Additionally, the PCA tracks project schedules to
3 ensure alignment with scope and schedule and is expected to proactively raise concerns
4 and escalate issues to the PM when discrepancies or risks are identified.

5 The PM on a large natural gas facility construction project like Buchanan Bluffs
6 Energy Center Unit 2 or a BESS construction project like Foxtrot BESS is responsible for
7 the overall delivery of the project, ensuring that it is completed on time, within budget, and
8 according to scope and quality requirements outlined in the project contracts. The PM
9 leads the coordination of project activities, manages the integration of schedules and
10 budgets, and oversees the execution of project plans, including the development of
11 contracting strategies and risk mitigation measures. The PM also facilitates
12 communication among internal teams, external contractors, and stakeholders, and is
13 accountable for resolving issues that may impact project objectives. Additionally, the PM
14 is responsible for ensuring compliance with regulatory, safety, and quality standards
15 throughout the project lifecycle.

16 The Project Supervisor on the Buchanan Bluffs Energy Center Unit 2 plays a vital
17 role by providing on-site oversight of all field construction and commissioning work,
18 ensuring that activities are performed in accordance with the contract, schedule, and quality
19 standards. They act as the first line of defense for addressing field issues, monitoring daily
20 progress, and working closely with the PM to resolve any problems that arise on
21 site. Project Supervisors also participate in inspections, support the commissioning and
22 start-up process, and help maintain safety and productivity on the job site. The Construction
23 Supervisor on the Foxtrot BESS project serves a similar role.

1 The following organization chart, shown below in **FIGURE 3**, shows the key
2 positions involved with project controls in Evergy's Generation Development group. The
3 boxes colored blue are involved in project controls at some level.

4 **FIGURE 3: Generation Development Organization Chart**



6 **Q: Are there other key personnel on the Projects' controls team?**

7 **A:** Yes. As Evergy's Senior Director of Conventional Generation Projects, J Kyle Olson is
8 responsible for the overall leadership and strategic direction of project management
9 activities for large-scale gas generation projects like Buchanan Bluffs Energy Center Unit

1 2. This role involves supervision of project managers, engineers, and other project staff to
2 ensure the successful delivery of new generating assets, with a focus on meeting scope,
3 cost, schedule, safety, and quality objectives. Mr. Olson's Conventional Generation team
4 proactively evaluates project risks, formalizes risk registers, and develops mitigation plans
5 to drive successful project outcomes. He leads the creation and finalization of milestone
6 and baseline project schedules, project execution plans, and contracting strategies that best
7 match the project's characteristics, deadlines, and risks. This position requires close
8 coordination with internal support teams such as operations, environmental, legal, supply
9 chain, regulatory, and finance, as well as with external resources like the OE and EPC
10 contractors. Finally, Mr. Olson is also responsible for ensuring compliance with regulatory
11 requirements, providing regulatory testimony and data request responses, and supporting
12 regulatory proceedings as needed.

13 As Director of Project Management and Controls, I have similar responsibilities,
14 although my team's project management focus is on renewable and early-stage
15 development projects like Foxtrot BESS. From a project controls perspective, my team is
16 responsible for tracking and monitoring scope, schedule and budget activities for the
17 renewable and conventional generation and BESS projects, including those contemplated
18 in this proceeding. I oversee the development, maintenance, and reporting of project cost
19 information, including budgets, commitments, expenditures, forecasts, and variances, and
20 am responsible for confirming progress measurement and initiating progress reporting to
21 stakeholders. My team also tracks construction progress on renewable and BESS projects,
22 monitors project risks, and helps develop mitigation plans.

1 Jess Bradshaw, as Manager Project Controls, oversees end-to-end project controls
2 by managing cost and schedule processes, ensuring accurate progress measurement and
3 reporting, and leading and developing the Project Controls team. Responsibilities include
4 maintaining budgets, forecasts, and variance analyses; establishing and updating baseline
5 schedules with contractors; evaluating cost and schedule performance to identify risks and
6 validate forecasts; coordinating with stakeholders on risk mitigation; and delivering
7 consistent monthly and quarterly regulatory and executive reporting. Ms. Bradshaw also
8 supports regulatory data requests and testimony, presents clear performance insights and
9 conclusions to stakeholders, and performs additional activities as needed to enable
10 successful project delivery.

11 **Q: How do the PCAs, PMs, and other key personnel interface regarding the scope,**
12 **schedule, and budget of the Projects?**

13 A: The PCA collaborates closely with the PMs, Project Supervisors and Construction
14 Supervisors by tracking project schedules, budgets, and scope, and by participating in
15 regular meetings to discuss project status, issues, and upcoming milestones. The PCA
16 provides critical data and analysis to inform decision-making, develops regulatory and
17 internal reports, and proactively raises concerns or risks to the PM when discrepancies are
18 identified. By integrating information from the construction site, project management, and
19 financial systems, the PCA ensures that all team members have accurate, up-to-date
20 information to support project success. This collaborative approach enables the project
21 team to identify and address issues early, to maintain alignment with project objectives,
22 and to deliver the facility efficiently and effectively.

1 Project and Construction Supervisors play an important role in the project controls
2 process by providing on-site oversight and ensuring that construction activities are
3 executed in accordance with the contract, schedule, and quality standards. They work
4 closely with the PM and PCA to monitor progress, address field issues as they arise, and
5 ensure that any deviations from the plan are promptly communicated and resolved. Their
6 presence on-site allows for real-time identification and mitigation of risks, supporting the
7 overall goal of delivering the project on time and within budget.

8 Other personnel that are involved with the tracking of scope, schedule and budget
9 include the Conventional Generation Program Analyst who helps to track and report on
10 project change orders, to track meetings and maintain project documentation, and to draft
11 and review monthly internal reporting, quarterly regulatory reporting, testimony, and data
12 requests. In addition, they work alongside PCAs to pull project financial data from
13 Evergy's systems and help troubleshoot invoices, purchase orders and accounting accruals
14 when necessary.

15 Lastly, the Conventional engineering and Renewable engineering teams help
16 monitor scope and schedule by working with the PMs to ensure the scope and construction
17 activities align with design documents. This starts early in the process with pre-
18 construction design reviews of our EPC design documents and continues throughout the
19 project with on-site field verification of work performed during construction. The
20 engineering teams work directly with Evergy's PMs and the respective engineering teams
21 from our contractors and vendors.

1 **Q: How does Evergy ensure that construction activities remain on schedule and within**
2 **budget during the execution of a natural gas or BESS project?**

3 A: Evergy maintains schedule and budget discipline through a combination of rigorous project
4 controls, regular oversight, and integrated team collaboration. Once the Primavera P6
5 schedule is received from the EPC contractor, the PCA is responsible for reviewing, noting
6 changes to, and informing PMs and the broader project team of variances or issues with
7 the project schedule. The PCAs will track progress and identify deviations from the
8 baseline schedule on an ongoing basis. Weekly meetings with the EPC contractor and
9 internal teams provide opportunities to review project status, discuss issues, and address
10 upcoming milestones. Project and Construction Supervisors, who are present on-site,
11 monitor daily activities to ensure compliance with contract terms, schedules, and quality
12 standards, and act as the first line of defense for resolving field issues. This integrated
13 approach allows for early identification of potential problems and timely implementation
14 of corrective actions, supporting the overall goal of delivering the project on time and
15 within budget.

16 **Q: Please describe the Projects' internal reporting processes, including the cadence,**
17 **content, and distribution of regular status reports.**

18 A: Internal reporting for these projects occurs on a weekly and monthly cadence. Weekly,
19 each PM conducts a project update meeting. All phases of the project are discussed at these
20 meetings, with a focus on the upcoming work for the week and relevant updates since the
21 prior meeting. Topics covered include real estate, community engagement, owner
22 furnished equipment status, EPC status, site activity status, schedule overview, risks and
23 issues, and next steps and action items.

1 Monthly, there is a more detailed project update meeting held to review the prior
2 month's activities. The same topics from the weekly meetings might be discussed, but there
3 is more focus on key accomplishments, issues, risks and mitigations, upcoming activities,
4 and schedules. The PowerPoint slides from these presentations are sent to Evergy
5 Generation Development personnel, colleagues in Accounting, Corporate
6 Communications, Corporate Planning, Environmental, Generation, Finance, Public
7 Affairs, and Regulatory and Governmental Affairs.

8 **Q: What systems and tools does Evergy use to manage and track project schedules,**
9 **budgets, and documentation for its generation development projects?**

10 A: Evergy utilizes Oracle Primavera P6 as its primary scheduling tool which enables the
11 integration of EPC contractor schedules and allows for real-time tracking of project
12 progress against a fixed baseline schedule. This system supports the identification of
13 schedule variances and facilitates corrective action when necessary.

14 For document control, Evergy has implemented a Box.com structured file
15 management system which allows for effective tracking, storage, and management of
16 project information and documentation. In addition, Evergy is developing a system to
17 aggregate financial project data from multiple sources, streamlining the process for PCAs
18 to pull and summarize financial information for both internal management and regulatory
19 reporting purposes. These systems collectively support robust project controls, enhance
20 communication among stakeholders, and ensure compliance with internal standards and
21 regulatory requirements.

22 These systems are utilized to track project schedules, budgets, and documentation
23 for Evergy's natural gas, renewable, and BESS projects.

1 **VI. EXTERNAL VENDORS AND CONSULTANTS**

2 **Q: Please identify the major vendors and consultants to Buchanan Bluffs Energy Center**
3 **Unit 2 and a general description of the services they provide.**

4 A: The major vendors and partners who have and will provide services toward Buchanan
5 Bluffs Energy Center Unit 2 are:

- 6 ▪ **Burns & McDonnell Engineering Company:** The Projects' OE.
- 7 ▪ **Kiewit Power Constructors Company ("Kiewit"):** The Projects' EPC
8 contractor.
- 9 ▪ **Mitsubishi Power Americas Inc. ("Mitsubishi"):** The manufacturer/supplier of
10 PIE for the Projects.

11 **Q: How does Burns & McDonnell interface with Evergy's project controls team?**

12 A: As discussed by Evergy's Mr. Olson in his direct testimony, Burns & McDonnell serves
13 as the OE for Buchanan Bluffs Energy Center Unit 2. The OE provides technical oversight,
14 reviews design and construction activities, and ensures that the EPC contractor's work
15 aligns with project requirements and industry standards. Burns & McDonnell interfaces
16 with Evergy's project controls team by participating in regular project meetings, reviewing
17 progress reports, and providing independent assessments of schedule, cost, and quality.

18 **Q: How does Burns & McDonnell as the OE interface with Evergy regarding the**
19 **Buchanan Bluffs Energy Center Unit 2 change order processes?**

20 A: Burns & McDonnell reviews and evaluates change order requests submitted by the EPC
21 contractor. It also provides technical input and recommendations to Evergy's project team,
22 helping to assess the validity, necessity, and impact of proposed changes. This ensures that
23 all change orders are thoroughly vetted before approval, supporting transparency and
24 prudent project management.

1 **Q: How did Evergy select Kiewit as Buchanan Bluffs Energy Center Unit 2’s EPC**
2 **contractor?**

3 A: As discussed by Mr. Olson, Evergy selected Kiewit as the Project’s EPC after a
4 comprehensive and competitive request for proposal (“RFP”) procurement process.

5 **Q: What is Kiewit’s role as the EPC regarding project control functions, including**
6 **responsibilities for schedule coordination with Evergy and monthly reporting?**

7 A: Kiewit maintains its own project controls function, including schedule development and
8 monthly reporting. Kiewit’s schedules are integrated with Evergy’s master project
9 schedule in Primavera P6, allowing for real-time tracking and coordination. This
10 integration enables Evergy to monitor progress, identify variances, and coordinate
11 activities across all project stakeholders. Moreover, Kiewit participates in weekly and
12 monthly meetings with Evergy’s project team to review progress, address issues, and
13 coordinate upcoming milestones.

14 Kiewit’s monthly reports are an in-depth summary of project safety, quality,
15 environmental, schedule, engineering, procurement, construction and start-up activities.
16 These reports are sent out prior to the monthly project meetings to allow time for Evergy’s
17 review and are then discussed in the monthly meeting. Questions, clarifications, and missed
18 or incorrectly identified updates are addressed either in the meeting or as follow-up items.
19 Ultimately, a revised monthly report is distributed as necessary after the monthly meeting.
20 This iterative process ensures alignment on the work that has been performed to date, as
21 well as on upcoming tasks.

1 **Q: How is Kiewit involved in the change order process?**

2 A: Kiewit initiates requests for proposed change orders (“PCO”), when modifications to
3 scope, schedule, or budget are contemplated. These requests are reviewed by Evergy’s
4 project team, with input from Burns & McDonnell as the OE. The process includes a
5 narrative explanation, impact assessment, and documentation of all changes. Kiewit
6 collaborates with Evergy to resolve any issues and ensure that all PCOs are properly
7 documented and approved before implementation. If a PCO is approved by Evergy, it
8 becomes an approved change order (“CO”). All COs are documented and tracked by
9 Evergy. If a PCO is not approved, Kiewit may choose to proceed with the change at its
10 own expense and with no impact to the project schedule.

11 **Q: What is Evergy’s change order process for the Projects?**

12 A: The process for managing change orders and claims is structured to ensure transparency,
13 documentation, and timely resolution. The first step is when a proposed change order
14 (“PCO”) is received by Evergy. An initial review is performed by the Evergy Development
15 team which decides whether to hold the PCO (i.e., if more information is needed or if
16 timing is of concern), to deny the PCO, or to approve the PCO. If approved, the PCO is
17 then presented to executive leadership which decides to hold or approve the PCO. Once
18 approved, the PCO is returned to the filing entity to create a contract change order
19 (“CCO”).

20 When a CCO is initiated, the PCA and project team review the proposed changes,
21 assess their impact on scope, schedule, and budget, and document the reasons for the
22 change, essentially a final accuracy review. All CCOs require a narrative explanation and

1 are tracked as part of the project documentation. Once assembled, the CCO documentation
2 is routed for internal approval.

3 **Q: Who on Evergy's project team is responsible for reviewing, vetting, and approving**
4 **project CCOs?**

5 A: Project CCOs are reviewed and vetted by multiple members of the project team. The PM,
6 Project Supervisor, and PCA review and verify contract compliance, necessity, and
7 potential scope, schedule and financial impact. Engineers review and vet CCOs for
8 constructability and technical feasibility. Legal, the OE, the Senior Director of
9 Conventional Generation Projects, and the Vice President of Development will review and
10 vet all aspects of CCOs. Larger CCOs, whether because of scope, schedule or financial
11 reasons, will be reviewed with executive leadership. The last step in the process of
12 approval is for the PM and Vice President of Development to sign off on the CCO.

13 **Q: How does Mitsubishi's scheduling integrate with Evergy, Burns & McDonnell, and**
14 **Kiewit?**

15 A: Mitsubishi's schedule coordination responsibilities are central to the successful and timely
16 delivery of Evergy's generation projects. By maintaining detailed delivery schedules,
17 providing regular updates, and actively collaborating with Evergy, Burns & McDonnell,
18 and Kiewit, Mitsubishi helps ensure that PIE components are delivered, installed, and
19 commissioned in alignment with the overall project plan. This integrated approach
20 minimizes schedule risks, supports efficient project execution, and contributes to the
21 achievement of Evergy's cost, schedule, and quality objectives.

1 **Q: Please identify the major vendors and partners to the Foxtrot BESS and a general**
2 **description of the services they provide.**

3 A: The major vendors and partners who have and will provide services toward the Foxtrot
4 BESS project are:

- 5 ▪ **Foxtrot Invenergy:** The Project's developer.
- 6 ▪ **EPC contractor:** To be determined.
- 7 ▪ **Owner's Engineer:** To be determined.

8 **Q: What is Foxtrot Invenergy's role regarding project control functions, including**
9 **responsibilities for schedule coordination with Evergy and monthly reporting?**

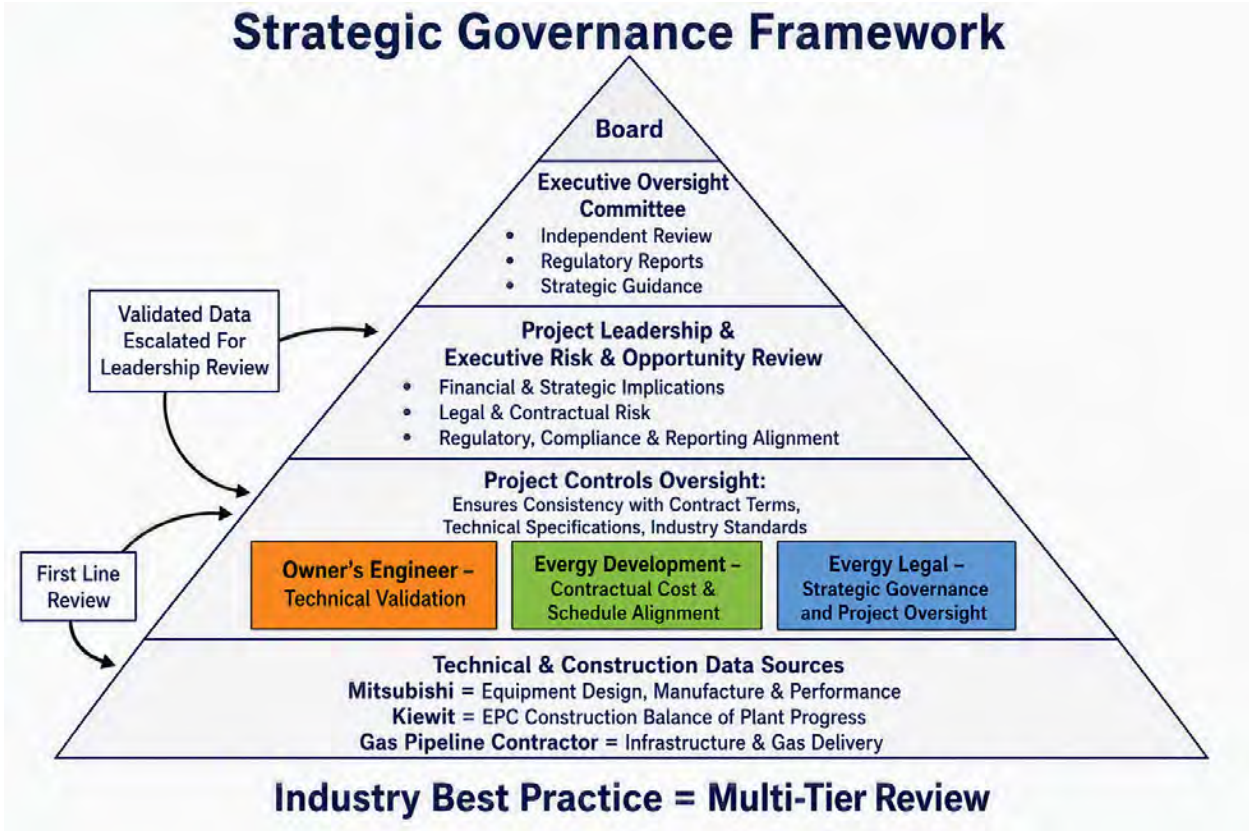
10 A: Similar to Kiewit with the Buchanan 2032 CCGT, Invenergy will maintain its own project
11 controls function, including schedule development and monthly reporting. Evergy will also
12 integrate the Invenergy schedule into its master schedule to allow for tracking and
13 coordination. Weekly and monthly meetings will occur to monitor progress, identify
14 variances and coordinate activities across all stakeholders. Moreover, Kiewit participates
15 in weekly and monthly meetings with Evergy's project team to review progress, address
16 issues, and coordinate upcoming milestones.

17 Monthly reporting from Invenergy will be consistent with what was described
18 previously for the Buchanan 2032 CCGT and Kiewit, to include attendance at and
19 participation in monthly project meetings.

20 **Q: Describe the change order process with Invenergy for the Foxtrot BESS project.**

21 A: The change order process for the Foxtrot BESS project mirrors the process identified above
22 for the Buchanan Bluffs Energy Center Unit 2, with the primary difference being the
23 scenario where Evergy denies a PCO from Invenergy. In this case, Invenergy could drop
24 the request, continue to negotiate with Evergy, or move the PCO to dispute resolution.

FIGURE 4: Strategic Governance Framework



Q: Please describe the roles and responsibilities of the internal and external experts who are part of the Strategic Governance Framework.

A: The Technical & Construction Data Sources base of the pyramid includes equipment manufacturers, EPC contractors, and infrastructure contractors responsible for producing raw technical, cost, schedule, and performance data. Their role is limited to execution and reporting in accordance with contractual requirements. They do not have decision-making authority within the governance structure. Instead, their outputs are subject to multiple layers of review and validation before being used for Evergy management or board of directors' decisions.

Project Controls Oversight represents the primary validation and assurance layer, combining internal expertise with independent external oversight. The OE provides

1 independent technical validation of designs, specifications, and performance assumptions
2 to ensure compliance with contracts, codes, and industry standards. Internal energy and
3 project teams validate contractor-reported costs and schedule data, ensuring alignment with
4 owner financial models and project baselines. Evergy Legal provides objective challenge
5 and verification, ensures contractual compliance, and provides strategic governance and
6 general project oversight. Together, these functions ensure that only validated, defensible
7 information is escalated to senior Evergy management.

8 At the Project Leadership and Executive Risk & Opportunity Review level,
9 depicted above in Figure 2, the internal project leadership and subject matter experts
10 synthesize validated technical, cost, and schedule data into management-level insight. This
11 tier evaluates financial and strategic implications, legal and contractual risks, and
12 regulatory compliance considerations. Project leadership determines mitigation strategies,
13 balances risks and opportunities, and decides which issues warrant escalation to executive
14 oversight.

15 The Executive Oversight Committee (“EOC”), composed of senior internal leaders,
16 reviews escalated issues, independent findings, and regulatory reports. Its responsibilities
17 include providing strategic direction, setting risk tolerance, approving major corrective
18 actions, and ensuring alignment with organizational objectives. While informed by
19 independent expert input, final accountability for decisions rests with the EOC.

20 **Q: How does Evergy’s Executive Oversight Committee (“EOC”) function?**

21 A: The EOC provides executive level governance for Evergy’s major generation construction
22 projects and represents a “review and challenge function” distinct from project
23 management. The EOC aids in the on-time, on-budget, and compliant delivery of critical

1 generation assets by reinforcing strategic alignment, prudent management, and regulatory
2 compliance. The EOC helps ensure that transparency and prudence expectations of state
3 regulators are met, which supports Evergy's demonstration of prudent governance in
4 construction oversight. The EOC's goals are to build regulator confidence, increase
5 stakeholder trust, and document institutional knowledge to serve as a model for future
6 prudence and strategic execution.

7 **Q: How often does the EOC meet?**

8 A: The EOC meets at least monthly. Ad hoc meetings are conducted should the need arise.

9 **Q: What information is presented to the EOC for its consideration?**

10 A: The meetings typically start with a review of overall contractor performance and general
11 oversight of the project portfolio. This would include a discussion of broader strategic
12 issues and performance concerns requiring guidance. Next, project specific updates are
13 reviewed, focusing on scope, schedule, budget, and change orders. The EOC will also
14 review change activity across the projects and discuss project controls and documentation
15 management. Lastly, updates on upcoming regulatory filings and reporting requirements,
16 and legal items as necessary, are discussed.

17 **Q: Does Evergy utilize a formal notice and notification procedure when reviewing and
18 vetting claims received from the Projects' contractors?**

19 A: Yes, it does. For contractor claims, Evergy utilizes the following formal notice and
20 notification procedure: Evergy's Generation Development team logs each notice, and
21 Project Managers, in consultation with PCAs, Evergy's Legal department and potentially
22 Evergy's Supply Chain group, determine the appropriate response. This process ensures
23 that all issues are documented, tracked, and addressed promptly, reducing the risk of

1 unresolved claims at project completion. By requiring contractors to submit claims during
2 the course of the project, Evergy enforces its contractual rights and enables commercial
3 disputes to be resolved quickly, before they can interfere with the contractor's
4 performance.

5 **Q: Based upon this procedure, what does Evergy do when it receives a notice from a**
6 **contractor?**

7 A: The Generation Development team, along with Supply Chain staff, if necessary, logs every
8 notice that is received, and the project team, with Evergy's law department, determine
9 whether a response is necessary. Responses to contractor notices are then drafted, reviewed
10 by the project teams and legal, and then logged prior to sending. If a contractor sends a
11 letter stating that it believes that it has been delayed by Evergy, we log the letter, analyze
12 it against the contract requirements, and then respond with a letter that is sent to the
13 contractor with Evergy's position.

14 **Q: What are the benefits of having this notification procedure?**

15 A: The procedure allows Evergy to document and track open issues with contractors. This
16 leads to a quick resolution of potential disputes and makes it less likely that a contractor
17 will submit a large claim at the end of the project that is a surprise to Evergy. This avoids
18 situations where contractors will try to wait until their work is done before making a claim
19 because it is harder for the owner to properly evaluate and respond to such claims. By
20 requiring the contractors to submit their claims as the project is constructed, Evergy
21 rigorously enforces its rights under the contracts. This also allows commercial disputes to
22 be resolved promptly and before they can interfere with a contractor's performance.

1 **VIII. CONCLUSION**

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

3 A: The Foxtrot BESS project is a proposed 109 MW, four-hour lithium-ion battery energy
4 storage facility in Jasper County, Missouri, co-located with the approved Foxtrot Solar
5 Project and expected to enter service in 2028. The project will utilize SPP's Surplus
6 Interconnection Service at the existing Asbury substation, avoiding transmission network
7 upgrades and providing a cost-effective way to add capacity, operational flexibility, and
8 grid resilience identified through Evergy Missouri West's 2026 Integrated Resource
9 Planning process.

10 To meet this need, Evergy evaluated multiple battery storage alternatives and
11 selected Foxtrot BESS due to its favorable economics, development maturity, low
12 permitting risk, and advantageous interconnection position. The project will be acquired
13 from Invenergy through a Build Transfer Agreement, under which Invenergy develops and
14 constructs the facility before transferring ownership to Evergy. Foxtrot BESS is a prudent,
15 strategically located resource that supports Evergy's future capacity needs while protecting
16 customers through robust technical, financial, and governance controls

17 From a technical and regulatory perspective, Evergy's engineering and
18 environmental reviews identified no significant concerns and confirmed the project aligns
19 with utility-scale battery storage requirements. While key risks include supply chain
20 constraints, tariff and regulatory changes, and construction labor availability, Evergy
21 structured the agreement to transfer most procurement and construction risks to Invenergy
22 while limiting tariff-related exposure through a contractual purchase price cap.

1 Evergy has a comprehensive project controls and governance framework, which includes
2 dedicated Project Controls Analysts, Project Managers, Project and Construction
3 Supervisors, Engineers, and executive oversight. Through structured reporting, change-
4 order management, and risk monitoring, Evergy intends to maintain strong oversight of
5 scope, schedule, budget, and project performance on the Buchanan Bluffs Energy Center
6 Unit 2 and the Foxtrot BESS projects.

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

8 A: Yes, it does.

In the Matter of the Application of 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 Natural Gas and Solar)
 Electrical Production Facilities and a Battery)
 Energy Storage System)

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

**SCHEDULE JC-1
CONTAINS CONFIDENTIAL
INFORMATION
NOT AVAILABLE TO THE PUBLIC.**

ORIGINAL FILED UNDER SEAL.



ALL-SOURCE REQUEST FOR PROPOSALS



EVERGY, INC.

ALL-SOURCE REQUEST FOR PROPOSALS FOR POWER
SUPPLY GENERATION CAPACITY AND ASSOCIATED
ENERGY

ISSUED FOR BID: 5/6/2025
PROPOSALS DUE: 7/1/2025

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Revision History

Revision	Date	Update(s)
Rev. 1.1	5/19/2025	• Updated schedule to delay submission of bid payment until after all Proposals are received. • Updated Section 3.1.5 to include that interconnection information be provided only with Proposal and Proposal Data Form (Appendix C) • Updated link in Section 1 to reference the 2025 Update to the IRP

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1.0 Overview

1.1 Project Requirements

Evergy, Inc. (Evergy) and its operating utility subsidiaries are issuing this Request for Proposal (RFP) to solicit offers from interested parties (Respondents) with the intent of securing Proposals for generation and storage projects with a Commercial Operation Date (COD) on or before December 31, 2032. All projects must interconnect within the Southwest Power Pool (SPP). Projects located in Kansas/Missouri or near Evergy's service territory are preferred.

In accordance with Evergy's commitment to reliability, affordability, and sustainability, they are seeking Proposals to fulfill energy needs identified in the Company's Integrated Resource Plan (IRP) as well as capacity needs in the SPP integrated market.¹

1.2 Company Information

Evergy, Inc. (NASDAQ GS: EVRG) serves approximately 1.7 million customers in Kansas and Missouri. It generates nearly half the power it provides to homes and businesses with emission-free sources. Evergy supports its local communities where it operates and strives to meet the needs of its customers through energy savings and innovative solutions. Evergy serves its retail customers through three vertically integrated regulated utilities: Evergy Kansas Central, Inc. (Evergy Kansas Central), Evergy Metro, Inc. (Evergy Metro) and Evergy Missouri West, Inc. (Evergy Missouri West)

Evergy Kansas Central is an integrated, regulated electric utility that provides electricity to customers in the state of Kansas. It has one active wholly owned subsidiary with significant operations, Evergy Kansas South, Inc. (Evergy Kansas South). Evergy Kansas Central is regulated by the Kansas Corporation Commission.

Evergy Metro is an integrated, regulated electric utility that provides electricity to customers in the states of Missouri and Kansas. Evergy Metro is regulated by the Kansas Corporation Commission and the Missouri Public Service Commission.

Evergy Missouri West is an integrated, regulated electric utility that provides electricity to customers in the state of Missouri. Evergy Missouri West is regulated by the Missouri Public Service Commission.

1.3 Role of 1898 & Co.

In connection with this RFP, Evergy has retained the services of an independent third-party, 1898 & Co., a part of Burns & McDonnell Engineering Co. Inc., to support the RFP process and work with Evergy to coordinate communications and perform the quantitative and qualitative evaluations of all Proposals. However, Evergy will make all final decisions, at its sole discretion, with regards to this RFP.

All Respondents will interface with 1898 & Co., alongside Evergy, for all communications related to this RFP including questions, RFP clarification issues, and RFP Proposal submittal.

1.4 RFP Website

All communications related to this RFP including questions, RFP clarification issues, and RFP Proposal Submittal will be hosted through the RFP website, monitored by 1898 & Co. The website is located at <https://evergy2025rfp.rfpmanager.biz/> and should be referenced for all additional details about the RFP.

¹ <https://investors.evergy.com/2025IRPUpdate>

In addition to the website, an 1898 & Co.-monitored email address, EvergyRFP@1898andco.com, will be available for communication regarding RFP materials. **Until bids are received, neither 1898 & Co. nor Evergy will respond to any communications about the RFP outside of the above website/email address.** During the bid window, any attempts to communicate with 1898 & Co. or Evergy outside of these channels may result in disqualification.

2.0 Information and Schedule

2.1 Information Provided to Potential Respondents

This RFP document and all its Appendices and forms are available on the RFP website, <https://evergy2025rfp.rfpmanager.biz/>. Interested parties are expected to download information related to the RFP with its required forms and complete the forms in Microsoft Word, Excel (all formulas included and unlocked), and/or PDF format. Respondents should submit properly completed forms by the specified deadline listed on the RFP website. Proposals that are nonconforming or incomplete may be deemed ineligible, at Evergy's sole discretion, and may not be considered for further evaluation.

By submitting a Proposal in response to this RFP, Respondent certifies that it has not divulged, discussed, or compared any commercial terms of its Proposal with any other party (including any other Respondent and/or prospective Respondent), and has not colluded whatsoever with any other party.

2.2 RFP Schedule

The following schedule and deadlines apply to this RFP. Evergy reserves the right to extend or otherwise modify any portion of this schedule at any time or terminate the RFP process at its sole discretion.

Table 1: RFP Schedule

Milestone	Completed by Date
Issue RFP	May 6, 2025
Submit Appendix A and B with intent to bid	May 27, 2025, 5:00 PM CDT
Pre-bid conference	June 4, 2025, 9:00 AM CDT
Submit all questions	June 24, 2025, 5:00 PM CDT
Bids and Appendix C due	July 1, 2025, 5:00 PM CDT
Bid payment due	July 16, 2025, 5:00 PM CDT
Shortlist selected	August 8, 2025
Shortlist Q&A Due	August 19, 2025, 5:00 PM CDT
Commercial Negotiations	At Evergy's Discretion
Latest COD	December 31, 2032

2.3 Pre-Bid Conference

A virtual pre-bid conference will be held on June 4th at 9:00 AM CDT. Respondent attendance is **highly encouraged**. Prospective Respondents may request details, submit questions, and sign up for the conference at <https://evergy2025rfp.rfpmanager.biz/>. Once the pre-bid conference is complete, questions and answers will be posted to the FAQ section of the RFP website.

2.4 Questions

All questions regarding this RFP should be submitted in writing to the RFP website, <https://evergy2025rfp.rfpmanager.biz/>. All relevant submitted questions will be answered on the FAQ page of the website as soon as practical, except for those containing sensitive bidder information which will be submitted directly to Respondent. Written questions will be accepted until five (5) business days before the date on which Proposals are due. Relevant answers to questions regarding this RFP process will be available to all bidders on the website's FAQ page. All questions will remain confidential and omit names of Respondents and other proprietary information.

3.0 General Requirements

3.1 Respondent Pre-Qualification

To be eligible to submit a Proposal in response to this RFP, Respondents must be pre-qualified. To pre-qualify, Respondents must submit a Confidentiality Agreement (Appendix A) and Pre-Qualification Form (Appendix B) through the RFP Website no later than May 27, 2025. Bidders that meet the defined standards will receive confirmation that they are pre-qualified to submit a Proposal. Failure to submit pre-qualification documents by the deadline may result in disqualification. Late submissions will be evaluated on a case-by-case basis and may be accepted or rejected at Evergy's sole discretion.

The following subsections detail the requirements a bid must meet to be considered as conforming and considered for evaluation within this RFP process. Evergy may reject, without further review, any Proposals that do not meet these standards.

3.1.1 Technology Types

All proven technology types will be accepted for evaluation within the scope of this RFP, so long the project is interconnected to SPP and the generation can be delivered to Evergy's service territories. Technology types that will be evaluated include, but are not limited to:

- Wind
- Solar PV
- Standalone Energy Storage Systems
- Energy Storage Systems partnered with any Generation Asset
- Conventional gas fired generation resources like, Combined Cycles, Combustion Turbines, and Reciprocating Internal Combustion Engines
- Other Technologies

3.1.2 Size

All Respondents are asked to price new generation and/or storage project(s) with a nameplate rating not to be less than 50 MW each. There is no upper limit on nameplate rating for project submissions.

3.1.3 Commercial Operation Date (COD)

Only projects with a COD on or before December 31, 2032, will be considered for this RFP process.

3.1.4 Permitted Bid Structures

In accordance with Evergy's goal of securing long-term generation capacity for its territory, Evergy will only consider Proposals that culminate in asset acquisition (e.g., a Build Transfer Agreement (BTA) or a Development Asset Sale (DAS)).

Additionally, Evergy will consider Power Purchase Agreements (PPAs) so long as the following criteria are met:

- The PPA bid is submitted **as an accompaniment** to at least one valid bid of any purchase structure listed above.
- Initial term length may be of any duration but must include optionality for Evergy to extend duration to a minimum of 10 years.
- The submittal meets all other criteria as provided within this RFP.

PPA offers that are submitted as a standalone bid will be rejected without further review.

3.1.5 Location

This RFP requires all Proposals for projects to be located within the SPP service territory. All Proposals in response to this RFP must have the capability of being registered by Evergy as a generation or storage resource in SPP. Proposal information submitted with Appendix C must include identification of proposed interconnection points and status of the generation interconnection agreement (e.g., interconnection status in SPP queue, upgrade costs currently assigned, etc.). Projects located in Kansas/Missouri or near Evergy's service territory are preferred.

3.1.6 Proposal Validity Duration

Proposal pricing submitted must be valid in accordance with the milestone schedule below. As such, pricing submitted with initial bids is binding until shortlisting. Proposals that are selected for the shortlist will have an opportunity to refresh their pricing at that time. This RFP requests Proposals that consist of firm fixed pricing and quantities.

Table 2: Pricing Validity Schedule

Price Submitted With	Must be Valid Through
Bid Submittal	Shortlisting
Shortlist Q&A/Best and Final Offer	Commerical Negotiations

3.1.7 Tax Credit Utilization and Compliance

Each Proposal submitted for this RFP must clearly indicate if the project intends to qualify for the prevailing wage and apprenticeship multiplier under the Inflation Reduction Act (IRA). If so, the Proposal must outline the approach for achieving compliance with these requirements. Additionally, Proposals should specify if the project is eligible for additional bonus tax credits, such as the Domestic Content Bonus or the Energy Community Bonus, and if those credits are included in the offer.

Moreover, Respondents are encouraged to detail any alternate strategies of securing IRA-related tax credits such as initiating construction early, utilizing Safe Harbor provisions, or other applicable methods within the submitted Proposal. Finally, Respondents should include an explanation of any tariff mitigation strategies in place, such as, securing domestic content for major equipment.

3.2 Proposal Evaluation Fee

For each proposed project site submitted by a Respondent, a non-refundable bid entry fee shall be paid. The fee for evaluating each generation facility Proposal is \$5,000 per technology. This sum will serve to defray evaluation costs by Evergy and limit extraneous Proposals.

A single Proposal fee allows the Respondent to offer both an asset acquisition offer and an accompanying PPA for the same proposed resource. One Proposal fee will cover the cost of one generation technology at a single project site with any of the following variations:

- Pricing variations
- Term of transaction
- In-service date
- Size/Capacity

For example, if one Proposal for a generating facility including solar and storage technologies is submitted, a minimum bid fee of \$10,000 will be required to evaluate the two technologies. This fee may cover the evaluation of a Proposal for solar, storage, and hybrid solar plus storage along with any of the variations listed above as long as the same site is assumed.

3.3 Multiple Proposals

If Respondent is submitting multiple Proposals for different assets, Respondent must indicate whether multiple projects can be developed in parallel and whether this would impact timelines or cost. Respondent is also asked to provide bundled pricing options for the purchase of multiple projects where possible.

3.4 Completeness and Accuracy of Proposal

Evergy requests that all Proposals are as complete and accurate as possible. A complete Proposal will include all documentation as provided for in Section 4 of this document.

Any Proposal deemed by Evergy to be incomplete may be dismissed at Evergy's sole discretion without further evaluation.

4.0 Proposal Content Requirements

This section details Evergy's expectations and requirements for the RFP bids for all Proposals as listed in Subsection 3.4.

All Proposals are required to include the following information:

- Executive summary
- Completed Proposal Data Form (Appendix C)
- Environmental and Local Permitting
- Site and Project Information/Layout
- Reliability and Technical Specifications
- Preliminary Production Estimates (including 8,760 models as applicable)
- Environmental Studies
- Interconnection Studies
- Project/Construction Schedule
- Operation and Maintenance Offerings
- Decommission Studies
- Financing Plan and Payment Schedule

The following subsections describe how this information should be reported to provide for the greatest opportunity to be evaluated fairly.

4.1 Executive Summary

The executive summary must include details about the project's characteristics and timeline, including any unique aspects and benefits. Proposals should include details on any community engagement activities implemented to build local community acceptance, including if neighbor and community outreach has been initiated. Proposals should include how all tax credits (including bonus credits) and / or assumed tariffs will be applied to project submittals and costs. Proposals should indicate which acquisition structure(s) are being proposed and provide bundled pricing options where possible if multiple projects are being offered.

4.2 Project Specification Data Form (Appendix C)

All Proposals **must** include the completed economic, permitting, and technological data sections in the Proposal Data Form (Appendix C). The form must be completed in its entirety and may not be substituted for any similar data forms. Respondents must address the following topics:

4.2.1 Economic Data

All Respondents are asked to provide detailed pricing information for **each bid and variation submitted** (including differences in term length, storage additions, acquisition structure, etc.). Information requested therein includes design life, economic assumptions (including IRA credits received), purchase and transmission costs, operation and maintenance (O&M) costs, escalation, and annual guaranteed energy.

All information reported in Appendix C will be used directly to quantify price factor scoring for bids. As such, any project or cost variations submitted without Appendix C will be deemed incomplete and may

be dismissed without further evaluation. If there are multiple pricing options for the same project, please complete multiple Appendix C forms for each pricing option.

4.2.2 Technical Specification Data Form

Proposals shall include reports and studies which include (but are not limited to) monthly average energy output analysis of project asset, and external factors that may impact production. The study must include at a minimum the following information:

4.2.2.1 Renewable Asset Information

- Make and model of technology
- Detailed topographic map of project area with facility locations Interconnection facilities location
- Turbine power curve utilized, and description of any adjustments made to the power curve (if applicable)
- On-site hourly predicted energy output for the past 3 years based upon MET tower data (wind assets), proposed turbine power curve (wind assets), on-site solar irradiance data or site-specific nationally recognized external solar irradiance and temperature resources (solar assets), annual degradation, and annual loss factors
- Annual P50, P75 and P90 energy production estimates during the first five years of the useful life of the project

4.2.2.2 Energy Storage Asset Information

- Storage technology and major components
- Guaranteed storage capacity (MW)/ storage energy (MWh)
- Expected capacity degradation per year (% of MW)
- Manufacturers operating specifications
- Annual cycle limitations
- Annual energy throughput limitations

4.2.2.3 Thermal Generation Resource Information

- Generation type and major equipment, including turbines, heat recovery, emissions control, etc.
- Ramp up/down rates
- Fuel consumption rates
- Prevention of Significant Deterioration permit status
- Estimated water consumption
- Fuel supply information
- Plant performance, including heat rates, plant outputs, etc. in ISO, summer, winter conditions

4.2.3 Environmental and Local Permitting

Proposals shall include a description, along with corroborating evidence (documents, emails, etc.), of all action taken in regards to environmental and local permitting.

Proposals shall include a list of any environmental studies conducted, determined by technology type. It is the responsibility of Respondent to identify any potential environmental concerns and provide study results demonstrating mitigation strategies to the permitting and development of the asset. In particular, the Proposal Data Form requests information regarding the status of on-site Wetlands, Threatened and Endangered Species (TES), and Cultural Resources surveys. If additional surveys have been completed, please include the final report with the submitted Proposal. If the final report is not yet available, please provide a description of the survey and its status within the Proposal document.

Similarly, in regards to local permitting, the Proposal Data Form requests the status of critical permitting milestones including a notice of intention submitted to the county, status of a permitting application, and the initiation of neighbor and community outreach to build community acceptance of the proposed project. If additional information regarding permitting is available, such as a permit matrix or plan, bidders may choose to submit extra documents with their Proposal.

4.2.4 Site Information

Proposals will include the name and location of the site, benefits and reasons for selecting this site, and proposed land rights. Proposal must include: a .pdf map of the site detailing fully executed leases, easements, or option agreement to lease the property or convey land rights to Respondent and general terms for any agreements Respondent is using or intends to use. A .kmz file shall also be included.

The IRA includes provisions allowing for additional tax credits for certain low-emission technology types located in an “Energy Community”. Bidders should notify Evergy whether their project meets energy community requirements and provide county/coordinate information for verification.

4.2.5 Project Layout

Proposals shall include anticipated placement of generation and/or storage asset and other project facilities, including transmission layouts and the Point of Interconnect. The locations of all assets will be described using latitude and longitude coordinates.

4.2.6 Reliability

Bidders must submit an Approved Vendor’s List with their Proposal. As the information is available, Proposals may also include technical specifications, numbers, and manufacturers of the proposed generation equipment. Proposals must also include a summary of the commercial operating experience of the chosen equipment including OEM, installed capacity of the asset model, the warranty terms for the asset that would be expected from the manufacturer, a description of the supervisory control and data acquisition (SCADA) system and power regulation capabilities real-time telemetering data. Additionally, please detail the designed conditions used.

4.2.7 Interconnection

Proposals shall include copies of all studies prepared or required by SPP. Proposals shall include the DISIS request number, if the study is completed and the estimated interconnection costs. If no such studies have been completed, the Proposals should include any studies prepared by qualified consultants. Proposals shall indicate the level of Network Resource Interconnection Service to be obtained for the project.

4.2.8 Project and Construction Schedule

Proposals shall include schedules that outline major milestones such as completion of permitting, financing, regulatory requirements, procurement, major construction, commissioning and regulatory testing, commercial operation date, etc. Evergy requires commercial operation dates on or before December 31, 2032.

4.2.9 Operation and Maintenance

Respondents shall provide details on any optional operation and maintenance services and provide associated costs. Additionally, respondent shall provide a proposed design and pricing for an operations and maintenance building, and indicate whether the O&M building is included in the overall project cost.

4.2.10 Decommissioning

Respondents shall include the proposed decommissioning plan along with any decommissioning studies that have been completed. At a minimum, a description of the plan to remove equipment and how this plan meets the requirements of applicable agreements or permit conditions should be included.

4.2.11 Financing Plan and Payment Schedule

Respondents shall include a proposed financing plan for the project, including but not limited to any condition precedent agreement(s) it has utilized in similar past transactions. Financing plans should include any pertinent IRA tax considerations, as well as evidence demonstrating the ability of Respondent to meet the requirements necessary to obtain credits.

For BTA options, Evergy requests the submission of a BTA payment schedule, which should be comprised of three separate payments; one at Mechanical Completion, the next at Substantial Completion (also referred to as COD), and the last at Final Completion. Moreover, Evergy will also evaluate options for Milestone Payment (Modified BTA) schedules.

5.0 RFP Evaluation Process and Selection

Proposals will be evaluated by 1898 & Co. and Evergy to determine the Proposal's alignment with the directives of this RFP bid criteria and Respondent's credit risk. Proposals may be eliminated for non-conformance or due to credit risk.

If the Proposal passes the initial evaluation, 1898 & Co. and Evergy will conduct a two-stage process as part of its Proposal evaluation and selection process. In the first stage, 1898 & Co. will conduct price, economic benefit, and non-price analyses designed to identify the best aligned Proposals. Evergy will select a shortlist based on those Proposals which have the highest overall score based on an evaluation of price, economic benefit and non-price factors.

In the second stage, Respondents of shortlisted Proposals will be requested to complete a shortlist Q&A Log requesting more granular information of their projects. This is also an opportunity for Respondents to refine their submissions. The final Proposals will be modeled and evaluated based on the impact of the Proposals on Evergy's overall system costs. A more detailed description of each stage of the process is provided below. Moreover, a summary of the scoring metrics and criteria is provided in Appendix D - All-Source RFP Scoring Matrix.

5.1 First stage: Development of Initial Shortlist

1898 & Co. and Evergy will evaluate each Proposal in a consistent manner by separately evaluating the price characteristics and qualitative factors.

Price factors will recognize the value of the power associated with the delivery profile submitted in the Proposal, as well as the capacity needs filled by any proposed resource. The information submitted through the Proposal Data Form (Appendix C) will be used as inputs in the pricing model.

Qualitative factors considered in scoring fall into four general categories:

- Alignment with Evergy's Long Term Energy Goals
- Project Risk Mitigation Factors
- Bidder History/Credit
- Environmental, Economic, and Community Impacts

The price, economic benefit and non-price evaluations will be added together and used to determine the initial shortlist. The initial shortlists in this RFP will be made up of the highest scoring Proposals.

5.1.1 Price Factor Evaluation

A pricing model will be used to calculate each Proposal's Levelized Cost of Energy (LCOE) per MWh and/or Levelized Cost of Capacity (LCOC) per MW value, as most applicable by resource type for evaluation.

The LCOE will be determined by dividing the levelized revenue requirements by the levelized expected annual MWh. LCOC will be determined by dividing the levelized revenue requirements by the levelized SPP-accredited MW capacity.

Respondents are strongly encouraged to include as much benefit as feasible from the IRA tax credits in their Proposals. While utilization of tax credits is not a direct scoring criterion in the RFP process, price factor evaluation of bids will strongly favor projects that provide reduced costs to Evergy via strategic implementation of credits.

5.1.2 Non-Price Factor

The primary purpose of the non-price analysis is to help gauge the factors related to the Proposal which are outside of price. The scorecard will be used to score the non-price criteria under three categories: (1) alignment with Evergy's long-term energy goals (2) project risk mitigation strategies and (3) historical performance and credit of bidder. The criteria for each of these four categories are set forth below:

Category 1 - Alignment with Evergy's Long Term Energy Goals

- Evergy dispatchability
- Bid structure (favoring Evergy ownership)
- Ownership structure of interconnection facilities

Category 2 - Project Risk Mitigation

- Site control/optionality
- Interconnection queue status
- Location
- Environmental Permitting
- Local Permitting

- Community and Neighbor Outreach
- Inflation Reduction Act credit verification (applicable technologies only)
- Operational control

Category 3 - Bidder History/Credit

- Credit and financial plan (includes Inflation Reduction Act implications)
- Development experience for project type offered
- Experience with SPP interconnection queue
- Liquidated damages for non-performance (preferred; greater of \$15M or \$5M/50 MW nameplate capacity)

5.1.3 Notification of Shortlisted Respondents

Following the first stage of evaluation, Respondents will be notified if their projects will or will not advance to the second stage of evaluation. While a detailed review of all submissions will occur and transparency into the scoring process is provided via the posted scoring matrix, Evergy will not provide individual feedback on why specific bids were or were not selected for the initial shortlist. Evergy reserves the right to issue additional subsequent solicitations for information and continue to conduct investigations for all received Proposals, including those not initially shortlisted.

5.2 Second Stage: Evaluation of Shortlisted Proposals

In the second stage of scoring, Respondents whose proposals have been shortlisted will be asked to submit further details regarding their projects in the form of a Shortlist Q&A Log. This stage provides Respondents the opportunity to consider further development of the project as well as provide additional information to differentiate their Proposal. The information requested will allow Evergy to evaluate the alignment of submitted Proposals with the aforementioned four categories in greater detail.

5.2.1 Best and Final Offer

During the shortlist phase, Respondents will also have the opportunity to refresh their offers to reflect further project development, updated pricing for equipment, or other costs from the time the initial Proposal was submitted to the time of “best and final” offer. Respondents are encouraged to lower their pricing or look for opportunities to enhance their production profiles (based, for example, on changes to equipment) and other means to increase the value of their Proposals to Evergy.

Respondents offering the same capacity and/or energy from one renewable generation resource or project to multiple solicitations are hereby advised that, if Evergy notifies Respondent that its offer is being shortlisted, the shortlisted Respondent is encouraged to withdraw the offer from all other solicitations.

5.3 Final Shortlist

Some or all of the Proposals on the initial shortlists will then be evaluated against any changes or additional criteria to during this second round of evaluation. Evergy’s internal cost model, used to determine customer and company Proposal benefits, will be used to determine which, if any, Proposals will advance to Commercial Negotiations.

Evergy may choose to engage the final shortlist Respondents in further discussions or negotiations. Any such discussions or negotiations may be terminated by Evergy at any time, for any reason.

5.4 Final Selection of Proposal(s)

The two stages described above constitute the formal evaluation process, which will be utilized to select the projects that will be submitted to the regulators for approval. In addition to this two-stage analysis, in selecting the final Proposals, Evergy will consider the economic benefit and non-price factors qualitatively. Furthermore, Evergy will also include in its evaluation any factor that may impact the total cost of a resource, including, but not limited to, all of the factors used in the initial shortlist cost analysis plus consideration of accounting treatment and potential effects due to rating agency treatment, if applicable and any costs that cannot be fully confirmed (e.g., interconnect cost).

6.0 Awarding of Contracts

This RFP is merely an invitation to make Proposals to Evergy. No Proposal in and of itself constitutes a binding contract. Evergy may, in its sole discretion, perform any one or more of the following:

- Determine which Proposals are eligible for consideration as Proposals in response to this RFP
- Issue additional subsequent solicitations for information and conduct investigations with respect to the qualifications of each Respondent
- Supplement, amend, or otherwise modify this RFP, or cancel this RFP with or without the substitution of another RFP
- Negotiate and request Respondents to amend any Proposals
- Select and enter into agreements with Respondent(s) who, in Evergy's sole judgment, is most responsive to this RFP and whose Proposal(s) best satisfies the interests of Evergy, its customers, state, legal and regulatory requirements (selection not necessarily made on the basis of any single factor alone)
- Issue additional subsequent solicitations for Proposals
- Reject any or all Proposals in whole or in part
- Vary any timetable
- Conduct any briefing session or further RFP process on any terms and conditions
- Select and enter into agreement(s) with Respondent(s) for additional MW of energy and/or capacity resources should additional demand be identified

7.0 Post-Bid Negotiations

Evergy may further negotiate both price and contract terms and conditions during post-bid negotiations. Post-bid negotiations will be based on Evergy's cost and value assessment. Evergy will continually update its economic and risk evaluations until both parties execute a definitive agreement acceptable to Evergy or the negotiations are terminated. Transactions may be subject to approval of terms and conditions that are satisfactory to Evergy in its sole and absolute discretion.

Any negotiated contract between Evergy and Respondent will be conditioned upon approval or acceptance without substantial change by all regulatory authorities that have, or claim to have, jurisdiction over any or all of the subject matter of this solicitation, including, without limitation, the Kansas Corporation Commission, the Missouri Public Service Commission, and the Federal Energy Regulatory Commission. Approval must be granted in a form and substance acceptable to Evergy in its sole discretion.

8.0 Miscellaneous

8.1 Confidentiality

All materials and Proposals submitted for inclusion in this RFP process will become the property of Evergy and will be used by 1898 & Co. as part of its Proposal evaluation. Evergy will take reasonable precautions and use reasonable efforts to protect any proprietary and confidential information contained in a Proposal provided that such information is clearly identified by Respondent as "Proprietary and Confidential" on the header section of the page on which proprietary and confidential information appears. Such information may be made available under applicable state or federal law to regulatory commission(s), their staff(s), or other governmental agencies having an interest in these matters without prior consultation or notice to Respondents. Evergy also reserves the right to release such information to its agents or contractors for the purpose of evaluating Respondent's Proposal, but such agents or contractors will be required to observe the same care with respect to disclosure as Evergy. Under no circumstances will Evergy or their agents or contractors, be liable for any damages resulting from any disclosure during or after the solicitation process.

Respondents are advised that Proposals are likely to be the subject matter of discovery in state or federal regulatory or judicial proceedings, including those initiated by a party other than Evergy. Discovery in these cases is routinely restricted by confidentiality agreements and standard protective orders issued by the regulatory agency, however, if required by order, Evergy may disclose proprietary and confidential information in the course of such proceeding as required by law without further notice to Respondent. Respondents are required to enter into a confidentiality agreement (CA) with Evergy in the form set forth in Appendix A. It is expected that Evergy and Respondents shall act in good faith in their dealings with each other with respect to this RFP and matters of confidentiality. The CA shall be executed prior to Evergy releasing any confidential information to Respondent.

Respondents should submit a copy of the signed CA to <https://evergy2025rfp.rfpmanager.biz/> at the same time they submit their Pre-qualification form. If Respondent has already executed a CA with Evergy relating to Evergy's Renewable Resource Request for Proposal, Respondent may submit a copy of that executed CA, and Evergy acknowledges that the executed CA will constitute an executed CA for purposes of this RFP. None of the materials received as part of a Proposal will be returned. In the event of an executed agreement(s), Respondents shall have no expectation of confidential treatment of such executed agreement(s) which will be subject to disclosure and filing with Evergy's applicable Kansas and/or Missouri regulatory commissions.

8.2 Reservation of Rights

Evergy will review and evaluate the Proposals and may negotiate with multiple Respondents which may lead to the development of one or more agreements. Evergy reserves the right, without qualification and in its sole discretion, to accept or reject any or all Proposals for any reason without explanation to Respondent, or to make an award to that Respondent, who, in the opinion of Evergy, will provide the most value to Evergy and its customers. Evergy will consider price, economic benefit, and non-price attributes in the evaluation of Proposals (please see Section 5). Evergy reserves the right to make an award to an offer other than the lowest price offer or the Proposal evidencing the greatest technical ability if Evergy determines that to do so would result in the greatest value to Evergy and its customers. Evergy may make an award of contract without further discussion at any time in the RFP process. Evergy reserves the right to reject any, all, or portions of the Proposals received for failure to meet any criteria set forth in this RFP. Evergy makes no guarantee that a contract award will result from this RFP. Evergy may decline to enter into an arrangement with any or all Respondents or may revise or terminate the RFP process at any time. Evergy reserves the right to revise the capacity needs forecast at any point during the RFP process or during negotiations and any such change may reduce, eliminate, or increase the amount of capacity or power sought. Evergy reserves the unilateral right to waive any technical or format requirements contained in the RFP. Evergy will review and may utilize all information, if any, submitted by Respondent that is not specifically requested as a part of this RFP. Those who submit Proposals do so without recourse against Evergy for either rejection of their Proposal(s) or for failure to execute an agreement for any reason. All offers shall be valid and binding upon Respondent through contract negotiations and contract execution.

8.3 Contacts

Website: <https://evergy2025rfp.rfpmanager.biz/>

Primary Contact: EvergyRFP@1898andco.com



1898andco.com

Evergy 2025 All-Source Request for Proposal

Appendix D -- Scoring Matrix

Purpose: This document intends to provide visibility into the scoring process and criteria for the Evergy's 2025 All-Source RFP. This is purely informational, this form should not be edited or submitted during Proposal submission.

Evergy will not provide individual feedback on why specific bids were or were not selected at the completion of this RFP process.

	Metric	Scoring Notes
Initial Screening	Minimum Bid Requirement Screening	
	Bids will be evaluated on project conformance to RFP participation requirements.	
	Minimum RFP Requirements - Ownership option provided as base bid - Online on / before 12/31/2032 - Minimum project size 50 MW - PPA's must provide extension option to reach a minimum of a 10 year contract length - Projects must use proven technology	Bid must meet all minimum RFP requirements. Bidders will have an opportunity to correct non-confirming bids
	Complete / Accurate Application	
	Paid Entry Fee	Bidder entry fee is \$5,000 per project, per technology.
Costs	Cyber security	Bidder agrees to meet all Evergy requirements.
	Phase I: Initial Shortlisting	
	Bids will be ranked using total points as determined by the following metrics.	
	LCOE	LCOE used only for applicable energy resources. Points awarded proportionally across bids of the same type.
	LCOC	LCOC used only for applicable capacity resources. Points awarded proportionally across bids of the same type.
Project Risks	Project Structure - Site Control / Optionality - Dispatchability / Operational Control - Interconnection Facilities	Project awarded points for site control, Evergy dispatchability, and control over interconnection facilities.
	Interconnection Status	Points awarded based on queue position, with an adder for an executed E&P agreement.
	Project Location	Points awarded based on project location.
	Environmental Permitting	Points awarded for completion of the following on-site surveys: -Wetlands -Cultural -Threatened & Endangered Species
	Local Permitting	Points awarded for tangible steps taken in the permitting process. Points awarded for notification of intent to develop project with County, submission of permit application, and initiation of neighbor & community outreach.
Bidder Risks	Credit and Financial Plan - Parental guarantee, surety bond, or letter of credit up to level of LD Greater of \$15M or \$5M/50 MW capacity of Liquidated	Bidder offers valid credit or financial plan and/or the full amount of liquidated damages.
	Credit Rating of Project Owner or Associated Financing Partner	Points awarded proportional to applicable credit rating.
	Developer Experience	Points awarded proportionally to the amount of substantially complete MW of capacity of the proposed technology type developed by the Respondent.
	SPP Experience	Points awarded proportionally to the number of projects that the Respondent has successfully brought online through the SPP queue.
	Phase II: Finalist Selection	
	Bids will be further evaluated based on the above criteria as well as additional information submitted with the Bidder Q&A Log. Refer to Section 5.2 of the RFP document for more information.	

**SCHEDULE JC-3
CONTAINS CONFIDENTIAL
INFORMATION
NOT AVAILABLE TO THE PUBLIC.**

ORIGINAL FILED UNDER SEAL.

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
Carlson Direct, p. 12, ln. 3-4	3, 4, and 6
Carlson Direct, p. 17, lns. 4-8 and 10-15	3, 4, and 6
Confidential Schedules JC-1 and JC-3	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.