

Exhibit No.:	_____
Issue(s):	Economic feasibility, failure to consider alternatives, public interest
Witness:	Dr. Nicholas H. Johnson
Type of Exhibit:	Rebuttal Testimony
Sponsoring Party:	Renew Missouri
Case No.:	EA-2026-0154
Date Testimony Filed:	September 15, 2026

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO.

EA-2026-0154

REBUTTAL TESTIMONY

OF

NICHOLAS JOHNSON

**ON BEHALF OF
RENEW MISSOURI**

SEPTEMBER 15, 2026

****DENOTES CONFIDENTIAL INFORMATION****

Public Version

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1 **I. INTRODUCTION AND PURPOSE**

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

3 A. My name is Dr. Nicholas Johnson. My business address is 1 Maybeck Pl, Elsah, IL 62028.

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

5 A. I am employed by Principia College as an Associate Professor.

6 **Q: On whose behalf are you testifying?**

7 A. I am testifying on behalf of Renew Missouri Advocates d/b/a Renew Missouri. Renew Missouri
8 is an advocacy group appearing before regulatory agencies such as the Missouri Public Service
9 Commission (“PSC” or the “Commission”), the Kentucky Public Service Commission, and the
10 Kansas Corporation Commission in the role as expert witnesses on clean energy. Renew
11 Missouri’s work involves engaging as intervenors on utility rate cases, applications for certificates
12 of convenience and necessity (“CCNs”), mergers and acquisitions, Accounting Authority Orders
13 (“AAOs”), and energy efficiency investment portfolios. Renew Missouri also routinely engages
14 in workshops and rulemaking by providing comments.

15 **Q. Please describe your educational background.**

16 A. I have a BS with majors in physics and religion from Principia College. I have an MS in
17 environmental policy from Michigan Technological University. I have a PhD in energy and
18 mineral engineering from Pennsylvania State University.

19 **Q. Please describe your professional background.**

20 A. I have been employed as a professor at Principia College since 2015 teaching in both the
21 department of economics and the department of sustainability. I worked at the US Department of
22 Energy (US DOE) in the Office of Policy for 18 months in between 2022 and 2024 as American
23 Association for the Advancement of Science (AAAS) Science and Technology Policy Fellow
24 (STPF) and then as a federal employee. At the US DOE, I focused on federal policy implications

1 for electricity markets, transmission line development analysis, and the effects of the current
2 entanglement of electricity and natural gas markets. As a professor I teach some directly relevant
3 topics to these proceedings—such as cost-benefit analysis—and others tangentially related such
4 as environmental economics and environmental justice.

5 My curriculum vitae is included as Schedule NJ-1 to my Rebuttal Testimony.

6 **Q. What is the purpose of your testimony?**

7 A. The purpose of my testimony is to explain that Evergy¹ has not demonstrated that the proposed
8 Mullin Creek #2 gas plant represents the most economically feasible resource for meeting future
9 capacity needs or the most prudent resource choice under the public-interest standard embodied in
10 the Tartan criteria. My testimony focuses on Tartan Factors 1 (need for the project), 2 (economic
11 feasibility), and 5 (public interest). While Evergy has presented evidence supporting a future need
12 for additional accredited capacity, and I appreciate that Evergy has been planning in a highly
13 unstable policy environment over the last decade, the record does not adequately demonstrate that
14 Mullin Creek #2, a 440 MW simple-cycle combustion turbine, is the most prudent resource choice
15 for satisfying that need.

16 **Q: Please provide a summary of your recommendations to the Missouri Public Service**
17 **Commission in this proceeding.**

18 A. My testimony focuses on Tartan Factors 1, 2, and 5. First, while Evergy has demonstrated a
19 likely future need for additional accredited capacity, I do not believe the record adequately
20 demonstrates that Mullin Creek #2 is the most prudent resource choice for satisfying that need. I
21 recommend that the Commission distinguish between demonstrating a need for capacity and
22 demonstrating a need for this specific resource. Second, I conclude that the resource-selection

¹ “Evergy” refers to Evergy Metro, Inc. (“Evergy Metro”) d/b/a Evergy Missouri Metro (“Evergy Missouri Metro,” “EMM,” “Company,” or “Applicant”).

outcome is sensitive to assumptions regarding resource accreditation, particularly projected ELCC values for storage resources and accreditation assumptions for new thermal generation. I recommend that the Commission carefully evaluate those assumptions and the degree to which they influence the preferred-plan outcome. Third, although Evergy evaluated numerous resource plans and sensitivities, I have not identified a direct comparison between Mullin Creek #2 and a portfolio specifically designed to provide an equivalent quantity of accredited capacity through battery storage or storage paired with renewable generation. I recommend that the Commission consider whether the absence of such a comparison limits its ability to evaluate the economic feasibility of the proposed resource. Finally, because customer fuel costs are recovered through Fuel Adjustment Clauses, I recommend that the Commission carefully consider customer exposure to future fuel-cost risk and the expected operating profile of Mullin Creek #2 when evaluating the public-interest and economic-feasibility implications of the project.

Q: Generally, what is your understanding of how the Commission evaluates whether to grant a requested certificate of convenience and necessity?

A. My understanding is that the Commission evaluates CCN applications under the “Tartan Factors”,² which include: (1) whether there is a demonstrated need for the project; (2) whether the project is economically feasible; (3) whether the applicant has the financial ability to complete the project; (4) whether the applicant has the managerial ability to complete and operate the project; and (5) whether the project promotes the public interest. The Commission's evaluation is not limited to whether a project can be built, but whether the applicant has demonstrated that the proposed resource represents a reasonable and prudent response to an identified need. My testimony focuses primarily on Tartan Factors 1, 2, and 5, specifically whether Evergy has

² *In re Tartan Energy Co., L.C.*, 3 Mo. P.S.C. 3d 173, Case No. GA-94-127, 1994 WL 762882 (Sept. 16, 1994).

1 demonstrated a need for the specific proposed resource, whether Mullin Creek #2 is the most
2 economically feasible means of meeting that need, and whether approval of the project serves the
3 long-term public interest.

4 **II. NEED FOR CAPACITY VERSUS NEED FOR THIS RESOURCE**

5 **Q. Do you agree that Evergy has demonstrated a need for additional capacity resources?**

6 **A.** Yes. The record supports a finding that Evergy faces growing resource-adequacy obligations
7 and expects substantial load growth over the planning horizon, including growth associated with
8 large-load customers in the near-term.³ The record also reflects Evergy's analysis of future
9 capacity needs and the contribution of projected load growth to those needs. My testimony does
10 not challenge the conclusion that additional accredited capacity may be required in the future.

11 **Q. If you do not dispute the need for additional capacity, what is your concern under the first**
12 **Tartan Factor of need?**

13 **A.** My concern is not whether additional capacity may be needed, but whether Evergy has
14 adequately demonstrated that the identified need is most prudently met through construction of
15 Mullin Creek #2. While Evergy's analysis supports a future capacity requirement, the record does
16 not sufficiently explain why a 440 MW simple-cycle combustion turbine is the most appropriate
17 resource choice when compared to alternative portfolios that may have different operating
18 characteristics, fuel-price exposure, and scalability. Consequently, I do not believe the record
19 adequately establishes that Mullin Creek #2 is the most prudent resource for meeting the projected
20 capacity need.

21 **Q. What assumptions appear particularly important to that determination?**

³ *Direct Testimony of Cody VandeVelde*, p. 6.

1 A. One important set of assumptions concerns the accreditation of battery-storage and renewable
2 resources. Evergy uses projected ELCC values for new battery and renewable resources in its IRP
3 planning. Under SPP's ACAP framework those ELCC values determine the accredited
4 contribution of resources for purposes of satisfying reserve-margin requirements.⁴ As projected
5 ELCC values decline, the amount of accredited capacity provided by the same resource also
6 declines. The projected reductions shown in Evergy's analysis are substantial over the planning
7 horizon.⁵ As a result, those assumptions can materially influence which resources are selected by
8 the optimization model.

9 **Q. Why does that matter?**

10 A. Because the preferred-plan outcome may be sensitive to those accreditation assumptions.
11 Evergy states that its ELCC estimates were based on recent SPP ELCC estimates and future
12 projections.⁶ However, the record does not clearly demonstrate how resource-selection outcomes
13 would change if future ELCC values differ from those projections. If alternative accreditation
14 trajectories lead to materially different resource portfolios, then the apparent preference for Mullin
15 Creek #2 may depend significantly on those assumptions rather than on an inherent advantage of
16 the resource itself.

17 **Q. Are there other accreditation assumptions that warrant scrutiny?**

18 A. Yes. ** [REDACTED]
19 [REDACTED]

⁴ In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's 2026 Integrated Resource Plan Annual Update Filing, File No. EO-2026-0188, *Evergy Missouri Metro 2026 Annual Update Integrated Resource Plan May 2026*, Tables p. 43.

⁵ In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's 2026 Integrated Resource Plan Annual Update Filing, File No. EO-2026-0188, *Evergy Missouri Metro 2026 Annual Update Integrated Resource Plan May 2026*, Tables 20, 21.

⁶ Evergy's response to the Staff of the Missouri Public Service Commission ("Staff") Data Request (DR) 27, MPSC_20260723-f.1-Answer-0027_6.docx p. 2.

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED] Because accredited capacity is a primary driver of resource selection in the model, it
5 is important to understand how sensitive the preferred-plan outcome is to that assumption. The
6 record would be stronger if it more clearly demonstrated whether reasonable changes to the
7 assumed outage rate and resulting accreditation value would materially affect the optimizer's
8 preference for Mullin Creek #2.

9 **III. LACK OF A DIRECT COMPARISON TO EQUIVALENT-CAPACITY STORAGE**
10 **ALTERNATIVES**

11 **Q. Do you agree with Evergy's assertion that the capacity need filled by Mullin Creek #2**
12 **cannot be met reliably or cost-effectively by renewable or storage resources?**

13 A. Not entirely. I agree that Evergy's modeling did not select renewable resources as a direct
14 replacement for Mullin Creek #2 in the ACDA sensitivity. However, I do not believe that result
15 alone demonstrates that renewable or storage-based alternatives are incapable of meeting the
16 identified capacity need. Rather, it demonstrates that under the specific assumptions used in
17 Evergy's capacity-expansion model, the model continued to select thermal resources. Evergy
18 witness Cody VandeVelde⁹ acknowledges that batteries, renewable resources, ACAP
19 accreditation, and ELCC methodologies were incorporated into the analysis, and Evergy's
20 evaluated a scenario in which Mullin Creek #2 was removed as an option. Nevertheless, the record

⁷ In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's 2026 Integrated Resource Plan Annual Update Filing, File No. EO-2026-0188, *Evergy Missouri Metro 2026 Annual Update Integrated Resource Plan May 2026*, p. 50; Evergy's response to the Staff of the Missouri Public Service Commission ("Staff") Data Request (DR) 27, MPSC_20260723-f.1-Answer-0027_2.docx.

⁸ Evergy Response to Staff Data Request 25, Q0025_CONF_Evergy LRE Ceiling Calculation (1).xlsx.

⁹ *Direct Testimony of Cody VandeVelde*, pp. 6-12.

1 does not provide a transparent comparison between Mullin Creek #2 and an alternative portfolio
2 specifically designed to provide a comparable quantity of accredited capacity through storage or
3 storage paired with renewable resources. As a result, the record demonstrates the outcome of
4 Evergy's modeling assumptions, but it does not necessarily demonstrate that a storage- or hybrid-
5 based alternative could not satisfy the same capacity requirement under a different set of
6 reasonable planning assumptions.

7 Furthermore, the 2026 planning results¹⁰ show that a number of alternative portfolios produce
8 relatively similar economic outcomes, with differences among many of the highest-ranked plans
9 amounting to less than a few percent of total NPVRR. Under those circumstances, assumptions
10 regarding accreditation, resource availability, and portfolio composition can materially influence
11 the selection of a preferred resource plan. The Commission should therefore exercise caution in
12 interpreting the ACDA results as conclusive evidence that Mullin Creek #2 is the only reliable or
13 cost-effective means of satisfying the identified capacity need.

14 **Q. Did Evergy evaluate alternatives to Mullin Creek #2?**

15 A. Yes. Evergy evaluated numerous alternative resource plans, sensitivities, and planning
16 scenarios. Evergy also evaluated Plan ACDA, which removed Mullin Creek #2 as an available
17 resource option.

18 **Q. Does that mean Evergy demonstrated that no reasonable storage-based alternative exists?**

19 A. No. The fact that Evergy evaluated many alternative plans does not mean that all potentially
20 relevant alternatives were directly compared. The record demonstrates that Evergy modeled
21 storage resources, renewable resources, and multiple combinations of resource additions.

¹⁰ In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's 2026 Integrated Resource Plan Annual Update Filing, File No. EO-2026-0188, *Evergy Missouri Metro 2026 Annual Update Integrated Resource Plan May 2026* Appendix 6D Evergy Metro Rankings and Performance Metrics.

1 However, I have not identified a scenario specifically designed to compare Mullin Creek #2 against
2 a portfolio intended to provide an equivalent amount of accredited capacity through battery storage
3 or battery storage paired with renewable generation.

4 **Q. Why is that distinction important?**

5 A. Because the question before the Commission is not simply whether Evergy's preferred plan
6 ranked well within Evergy's modeling framework. The question is whether Mullin Creek #2
7 represents the most economically feasible resource choice. To answer that question, it would be
8 useful to understand how Mullin Creek #2 compares with alternatives intended to provide a similar
9 quantity of accredited capacity. The record contains a comparison between the preferred plan and
10 a No-Mullin-Creek sensitivity, but I have not found a direct comparison between Mullin Creek #2
11 and a portfolio specifically constructed around an equivalent accredited-capacity contribution from
12 storage resources or storage paired with renewable generation.

13 **Q. Why do you believe such a comparison would be useful?**

14 A. The 2026 Annual Update demonstrates that Evergy's planning process considered numerous
15 scenarios and that many resource plans produced relatively similar economic outcomes. Where
16 differences among competing plans are relatively small, understanding the economics of specific
17 resource choices becomes increasingly important. A direct comparison between Mullin Creek #2
18 and an alternative portfolio designed to provide a similar accredited-capacity contribution would
19 help clarify whether the apparent preference for Mullin Creek #2 reflects an inherent economic
20 advantage of the resource itself or simply the result of the particular portfolio combinations
21 evaluated by the model. Evergy's resource-selection process is not solely a mechanical exercise
22 in selecting the portfolio with the lowest modeled NPVRR. Mr. VandeVelde states that while
23 minimization of NPVRR cost is the primary objective function it is not the only objective, which

1 implies some level of other criteria and/or judgement is used “to provide service that is safe,
2 reliable, efficient, compliant with legal mandates, and in the public interest.”¹¹ The IRP process
3 provides a holistic and integrated view, allowing utilities to select the most cost-effective and
4 resilient resource mix over the long term, rather than simply defaulting to the cheapest resources
5 in the short term. Indeed, the preferred plan (ACAA) in the 2026 IRP update was the third cheapest
6 and Evergy explicitly used expert judgement in making the selection.¹² The resource-plan
7 rankings demonstrate that multiple portfolios often produce very similar economic outcomes; the
8 differences between many plans are relatively small on a percentage basis. Where relatively small
9 economic differences separate competing portfolios, understanding the assumptions and
10 alternatives underlying the preferred resource choice becomes especially important.

11 **Q. How does that relate to Mullin Creek #2?**

12 A. Although Evergy evaluated numerous resource plans and sensitivities, I have not identified a
13 portfolio specifically designed to provide an equivalent amount of accredited capacity through
14 battery storage or battery storage paired with renewable generation. The record therefore
15 demonstrates that Evergy's model selected Mullin Creek #2 under the assumptions provided to the
16 model, but it does not provide a direct comparison showing whether a portfolio intentionally
17 constructed to provide a similar accredited-capacity contribution would produce materially
18 different economic results. Under these circumstances, understanding the assumptions that drive
19 resource selection becomes especially important. While the model selected Mullin Creek #2 in the
20 preferred portfolio and in the No-Mullin-Creek sensitivity the replacement resources did not
21 consist solely of storage, the record does not provide a transparent, apples-to-apples comparison

¹¹ *Direct Testimony of Cody VandeVelde*, p. 3

¹² In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro’s 2026 Integrated Resource Plan Annual Update Filing, File No. EO-2026-0188, *Evergy Missouri Metro 2026 Annual Update Integrated Resource Plan May 2026*, p. 3 and Table 17.

1 between Mullin Creek #2 and alternative portfolios designed specifically to provide an equivalent
2 quantity of accredited capacity through storage or storage paired with renewable generation.
3 Consequently, it is difficult to determine whether the apparent economic preference for Mullin
4 Creek #2 reflects a fundamental advantage of the resource itself or particular modeling
5 assumptions regarding accreditation, storage economics, and resource availability.

6 **Q. What conclusion do you draw?**

7 A. I am not suggesting that Evergy failed to evaluate alternative resources. The record
8 demonstrates that Evergy performed extensive modeling and sensitivity analysis. My concern is
9 narrower. Despite the large number of scenarios evaluated, I have not identified a direct, apples-
10 to-apples comparison between Mullin Creek #2 and a portfolio intentionally designed to provide
11 an equivalent quantity of accredited capacity through battery storage or battery storage paired with
12 renewable generation. Given that Evergy itself considers factors beyond simple NPVRR rankings
13 when selecting a preferred plan, such a comparison would help the Commission better evaluate
14 whether Mullin Creek #2 represents the most economically feasible resource choice under Tartan
15 Factor 2 and Tartan Factor 5. Consequently, the record does not clearly demonstrate how the
16 economics of the proposed facility compare with that specific class of alternatives.

17 **IV. CUSTOMER EXPOSURE TO FUEL COST RISK**

18 **Q. Did you review Evergy's prior Integrated Resource Plan modeling to understand how**
19 **combustion turbines were expected to operate in selected resource plans?**

20 A. Yes. I reviewed the annual generation information associated with Evergy Metro's 2024
21 preferred plan (CAAB), which was the top-ranked portfolio in the 2024 IRP.¹³ The generation

¹³ In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's 2024 Triennial Integrated Compliance Filing Pursuant to 20 CSR 4240-22, File No. EO-2024-0153, *Evergy Metro Volume 6 Integrated Resource Plan and Risk*

1 outputs indicate that the combustion turbine selected by the model was expected to operate at very
2 low utilization levels in most years. Based on the annual generation data, the implied capacity
3 factor of the combustion turbine was generally only a few percent, and in most years was below
4 three percent. Only a limited number of years showed materially higher utilization.

5 **Q. What significance do you attach to those utilization levels?**

6 A. The low capacity factors suggest that the combustion turbine's primary value in Evergy's
7 planning models was its contribution to accredited capacity rather than its production of energy.
8 In other words, the resource appears to have been selected principally to satisfy reserve-margin
9 and resource-adequacy requirements rather than to generate significant amounts of electricity on
10 an annual basis. That distinction is important because the economic justification for the resource
11 depends heavily on the assumptions used to value its capacity contribution.

12 **Q. How does that observation relate to the proposed Mullin Creek #2 facility?**

13 A. ** [REDACTED]
14 [REDACTED]
15 [REDACTED]^{14**} However, I have not identified a
16 comparable public analysis showing the expected annual generation, operating hours, or capacity
17 factor associated with Mullin Creek #2 under the preferred plan ACAA. Because the project's
18 economic evaluation includes fuel costs through the NPVRR analysis, Evergy necessarily modeled
19 some level of operation. Yet the expected utilization of the facility is not readily apparent from
20 the materials I reviewed.

Analysis Integrated Resource Plan 20 CSR 4240-22.060 April 2024, Appendix 6B Annual Generation by ARP and Appendix 6D Evergy Metro Rankings and Performance Metrics.

¹⁴ In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's 2026 Integrated Resource Plan Annual Update Filing, File No. EO-2026-0188, *Evergy Missouri Metro 2026 Annual Update Integrated Resource Plan May 2026*, p. 50; Evergy's response to the Staff of the Missouri Public Service Commission ("Staff") Data Request (DR) 0027_2. MPSC_20260723-f.1-Answer-0027_2.docx.

1 **Q. Why is that important from an economic-feasibility and public-interest perspective?**

2 A. Evergy's NPVRR analysis incorporates assumptions regarding fuel prices, load growth, and
3 plant operation. The 2026 Annual Update identifies data-center and AI-related development as a
4 significant driver of forecasted load growth,¹⁵ and Evergy has devoted substantial analysis to
5 forecasting those loads. My concern is therefore not that Evergy failed to model future demand.
6 Rather, my concern is that uncertainty surrounding future large-load development creates
7 uncertainty regarding how frequently Mullin Creek #2 may ultimately operate. Missouri
8 customers will pay actual fuel costs through fuel-adjustment mechanisms, not the fuel costs
9 assumed in planning models. If data-center growth, baseload demand, or other large-load
10 development results in Mullin Creek #2 operating more frequently than anticipated, customer fuel
11 expenditures may be materially higher than those reflected in Evergy's economic forecasts.
12 Because I have not identified a clear presentation of the facility's expected operating profile, annual
13 generation, or capacity factor under the preferred plan, it is difficult to assess how sensitive the
14 projected economics are to higher utilization levels, increased fuel consumption, or increased
15 recovery of fuel costs through Fuel Adjustment Clauses.

16 **Q. Are you suggesting that Evergy's load forecast is unreasonable?**

17 A. No. The record demonstrates that Evergy has performed extensive load forecasting and expects
18 substantial growth associated with large-load customers, including three data centers in the Metro
19 Large Load Customer Pipeline.¹⁶ My point is that the proposed facility is justified primarily as a
20 capacity resource, while the economic consequences to customers depend upon how frequently

¹⁵ In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's 2026 Integrated Resource Plan Annual Update Filing, File No. EO-2026-0188, *Evergy Missouri Metro 2026 Annual Update Integrated Resource Plan May 2026*, p. 10.

¹⁶ In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's 2026 Integrated Resource Plan Annual Update Filing, File No. EO-2026-0188, *Evergy Missouri Metro 2026 Annual Update Integrated Resource Plan May 2026*, Table 45.

1 the facility ultimately operates. If future load growth results in substantially greater utilization
2 than contemplated by the planning assumptions, customers would bear correspondingly greater
3 fuel-cost exposure. Not all potential large load customers were included in base load planning,
4 depending on where they are in Evergy's internal review process.¹⁷ Understanding the expected
5 operating profile of Mullin Creek #2 is therefore important when evaluating both the project's
6 economic feasibility and its consistency with the public interest.

7 **Q. What conclusion do you draw from this information?**

8 A. My conclusion is not that Evergy failed to model fuel costs or plant utilization. Rather, my
9 concern is that the public record emphasizes Mullin Creek #2's accredited-capacity contribution
10 while providing limited transparency regarding the extent to which the facility is expected to
11 operate and consume fuel. Given that fuel costs are ultimately borne by customers, the
12 Commission should understand how the economics of the preferred plan change if Mullin Creek
13 #2 operates more frequently than assumed and whether that increased utilization could materially
14 affect customer costs recovered through Fuel Adjustment Clauses.

15 **V. INFLUENCE OF PRIOR DEVELOPMENT DECISIONS ON RESOURCE**
16 **SELECTION**

17 **Q. Does Mullin Creek #2 appear to benefit from being constructed at a site that was**
18 **originally planned for two generating units?**

19 A. Yes. The record indicates that the Mullin Creek site was developed as a two-unit site from the
20 outset.¹⁸ Evergy obtained land rights, transmission interconnection rights, permitting, and other
21 development-related assets with the expectation that a second unit could eventually be constructed.

¹⁷ *Direct Testimony of Cody VandeVelde*, pp. 13-14.

¹⁸ *Direct Testimony of Jason Humphrey*, pp. 4-5.

1 Everygy also states that the project benefits from a "design once, build many" philosophy and the
2 experience gained from developing Mullin Creek #1.

3 **Q. Why is that relevant to Tartan Factor 5, the public interest?**

4 A. Development efficiencies can provide real value for customers by reducing project risk,
5 shortening development timelines, and potentially lowering costs. However, those advantages do
6 not necessarily establish that the proposed resource is the most prudent resource choice under
7 present-day conditions. The fact that a site was planned for a second generating unit does not, by
8 itself, demonstrate that completing that second unit remains preferable to alternative resource
9 options.

10 **Q. What is your concern?**

11 A. My concern is that the record does not clearly distinguish between the value of the resource
12 itself and the value associated with prior development decisions. The Commission should
13 understand whether Mullin Creek #2 was selected primarily because it represents the most
14 economical and prudent resource available today, or whether its selection was influenced in part
15 by the incremental advantages that naturally arise when a project is built at an already-developed
16 site.

17 **Q. Why is that distinction important?**

18 A. Because the public interest is best served when resource decisions remain responsive to current
19 circumstances. The Commission should be confident that the preferred outcome reflects today's
20 planning assumptions, costs, resource alternatives, and customer needs, rather than simply
21 continuing a development strategy established several years ago. In my view, the record would be
22 stronger if it provided a clearer comparison between completion of the second Mullin Creek unit

1 and alternative portfolios capable of meeting similar reliability objectives under current planning
2 assumptions.

3 **VI. CONCLUSION**

4 **Q. What is your conclusion and recommendation to the Commission?**

5 A. Evergy has demonstrated that additional accredited capacity is likely to be needed in the future.
6 My testimony does not dispute that conclusion. Rather, my concern is that the record does not
7 adequately demonstrate that Mullin Creek #2 is the most prudent resource choice for meeting that
8 need. The outcome of Evergy's resource-selection process appears sensitive to assumptions
9 regarding resource accreditation, future ELCC values, and the treatment of alternative
10 technologies. While Evergy evaluated numerous scenarios and sensitivities, I have not identified
11 a direct comparison between Mullin Creek #2 and a portfolio specifically designed to provide an
12 equivalent amount of accredited capacity through battery storage or battery storage paired with
13 renewable generation.

14 I therefore recommend that the Commission in this case: (1) distinguish between the need for
15 capacity and the need for this specific resource; (2) require greater transparency regarding the
16 assumptions that drive resource selection; (3) evaluate how sensitive the preferred-plan outcome
17 is to accreditation assumptions for both storage and thermal resources; (4) seek a clearer
18 understanding of the expected utilization of Mullin Creek #2 and the resulting customer fuel-cost
19 exposure; and (5) consider whether alternative resource portfolios could satisfy the same reliability
20 objectives while providing greater flexibility and lower long-term risk to Missouri customers. In
21 addition, if the Commission should approve this CCN request, I recommend that future IRP filings
22 and annual updates used to support CCN requests: (1) include selected capacity-expansion
23 scenarios developed in response to stakeholder input; and (2) incorporate probabilistic assessments

1 of ratepayer cost exposure for key parameters and variables that are not routinely evaluated through
2 high-, mid-, and low-case assumptions, including ELCC trajectories and combustion-turbine
3 utilization rates. Particular attention should be given to assumptions for which resource-selection
4 outcomes or NPVRR results are highly sensitive, and to parameters and variables that may
5 materially affect costs ultimately borne by customers through mechanisms such as Fuel
6 Adjustment Clauses. Such analyses would provide the Commission with a clearer understanding
7 not only of expected outcomes, but also of the range and likelihood of adverse customer-cost
8 impacts if planning assumptions prove inaccurate.

9 **Q. Does this conclude your testimony?**

10 A. Yes.

11

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Evergy)
Metro, Inc. d/b/a Evergy Missouri Metro for)
Permission and Approval of a Certificate of)
Convenience and Necessity Authorizing It to) Case No. EA-2026-0154
Construct, Install, Own, Operate, Manage,)
Maintain, and Control a Natural Gas)
Electrical Production Facility)

AFFIDAVIT OF NICK JOHNSON

STATE OF ILLINOIS)
) ss
COUNTY OF MADISON)

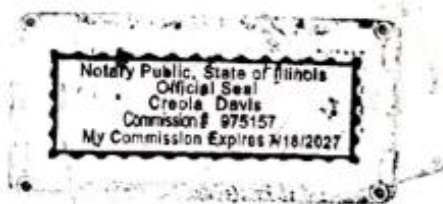
COMES NOW Nick Johnson and on his oath states that he is of lawful age; that he prepared the attached Rebuttal Testimony; and that the same is true and correct to the best of his knowledge and belief.

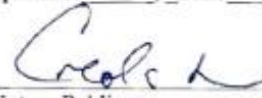
Further the Affiant sayeth not.



Nick Johnson

Subscribed and sworn before me this 12 day of September, 2026.





Notary Public

My Commission expires: 7-18-27