Exhibit No.:	
Issue:	Large Load Customers, Economic Development
Witness:	Zac Gladhill
Type of Exhibit:	Direct Testimony
Sponsoring Party:	Evergy Missouri West
Case No.:	ER-2027-0077
Date Testimony Prepared:	November 3, 2026

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: ER-2027-0077

DIRECT TESTIMONY

OF

ZACHARY GLADHILL

ON BEHALF OF

EVERGY MISSOURI WEST

Kansas City, Missouri

November 2026

Table of Contents

I. INTRODUCTION 1

II. OVERVIEW OF THE LARGE LOAD CUSTOMER LANDSCAPE 4

III. LARGE LOAD CUSTOMERS IN THE COMPANY'S SERVICE TERRITORIES 10

IV. CONCLUSION 13

DIRECT TESTIMONY

OF

ZACHARY GLADHILL

Case No. ER-2027-0077

I. INTRODUCTION

Q: Please state your name and business address.

A: My name is Zachary Gladhill. 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 Vice President – Strategy and Long-Term Planning for Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("EMM") and Evergy Metro, Inc. d/b/a Evergy Kansas Metro ("EKM") (collectively, "Evergy Metro"), Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West," "EMW," or "Company"), and Evergy Kansas Central, Inc. and Evergy Kansas South, Inc., collectively d/b/a Evergy Kansas Central ("EKC") the operating utilities of Evergy, Inc. ("Evergy").

Q: Who are you testifying for?

A: I am testifying on behalf of Evergy Missouri West.

Q: What are your responsibilities?

A: My responsibilities include coordination within the executive team to develop and advance Evergy's corporate and business strategy, and to lead the development of Evergy's integrated resource plan ("IRP"), transmission, distribution planning, and key cross-functional strategic initiatives. I also have primary responsibility for the oversight of the technical solutions and commercial structures for large load customers, ensuring Evergy's approach remains responsive to the rapidly evolving nature of large customer development.

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

A: I received a Bachelor of Science degree in mechanical engineering from Oklahoma Christian University, and a master's in business administration from Arizona State University. Additionally, I have completed the Utility Executive Course at the University of Idaho. Prior to joining Evergy, I was employed at Oklahoma Gas & Electric for over 20 years. There, I began my career in the generation business unit as a Process and Maintenance Engineer. I held several operational and project management leadership roles, including Plant Manager and Director, before transitioning to Distributed Energy Resource Director, and ultimately the most recent role leading large customer major projects, strategy, and innovation function. I ended my tenure with Oklahoma Gas & Electric as the Director of Grid Innovation and Integration.

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

A: Yes, I have filed testimony at the Commission in Evergy's large load tariff filing Case No. EO-2025-0154 and Evergy Missouri Metro's rate case, Case No ER-2026-0143, as well in both Oklahoma and Arkansas.

Q: What is the purpose of your direct testimony?

A: The purpose of my direct testimony is to discuss the influx and impact of new large load customers in Evergy Missouri West's service territory, particularly the economic development and energy security provided by these customers. I will also discuss the Path to Power process implemented by the Company to assess and provide service to new loads of 25 megawatts ("MW") and greater. My testimony will also address Evergy's Commission approved Large Load Power Service ("LLPS") Rate Plan, as modified by the

Non-Unanimous Stipulation and Agreement in the fall of 2025 in Case No. EO-2025-0154.[1] The LLPS Rate Plan also established Schedule Large Load Power Service ("Schedule LLPS"), which, unlike the Path to Power process, applies to customers with loads of 75 MW and greater.[2] I will describe the oversight under my responsibility for the interplay between large load customer negotiations and service, system planning, and generation capacity and energy planning and resource adequacy assessment. Evergy's coordination and efforts across all of these areas is essential to its ability to meet the needs of new large customers while ensuring reliability and sustainability of service for Evergy's existing customers.

Q: Please provide an executive summary of your testimony.

A: My testimony explains the rapid growth of large-load customers, especially data centers and advanced manufacturing, driving unprecedented electricity demand nationally and in Missouri, and the reliability and planning implications of that load growth. It further outlines Missouri's policy posture, including Senate Bill 4 ("S.B. 4") and Section 393.130.7,[3] which directs development of transparent, non-discriminatory large-load tariffs that align rates with incremental cost to serve and protect other customers. It describes Evergy's Commission-approved LLPS Rate Plan and Schedule LLPS tariff, which provide clear eligibility, pricing, commitments, safeguards, and optional clean-energy riders to support economic development while avoiding cross-class subsidization. The testimony also details Evergy's Path to Power - the extensive internal

[1] See Report & Order, In re App. Evergy Approval of New and Modified Tariffs for Service to Large Load Customers, No. EO-2025-0154 (Nov. 13, 2025).
[2] See Report & Order, In re App. Evergy Approval of New and Modified Tariffs for Service to Large Load Customers, No. EO-2025-0154 (Nov. 13, 2025).
[3] All citations are to the Revised Statutes of Missouri (2016), as amended.

coordination across system planning, construction, and resource adequacy assessment required to successfully bring these large loads online. Finally, it highlights Evergy Missouri West's active pipeline of prospective large loads and explains how these efforts culminate in a signed Electric Service Agreement ("ESA") that deliver jobs, tax revenues, and grid efficiency benefits for all customers.

II. OVERVIEW OF THE LARGE LOAD CUSTOMER LANDSCAPE

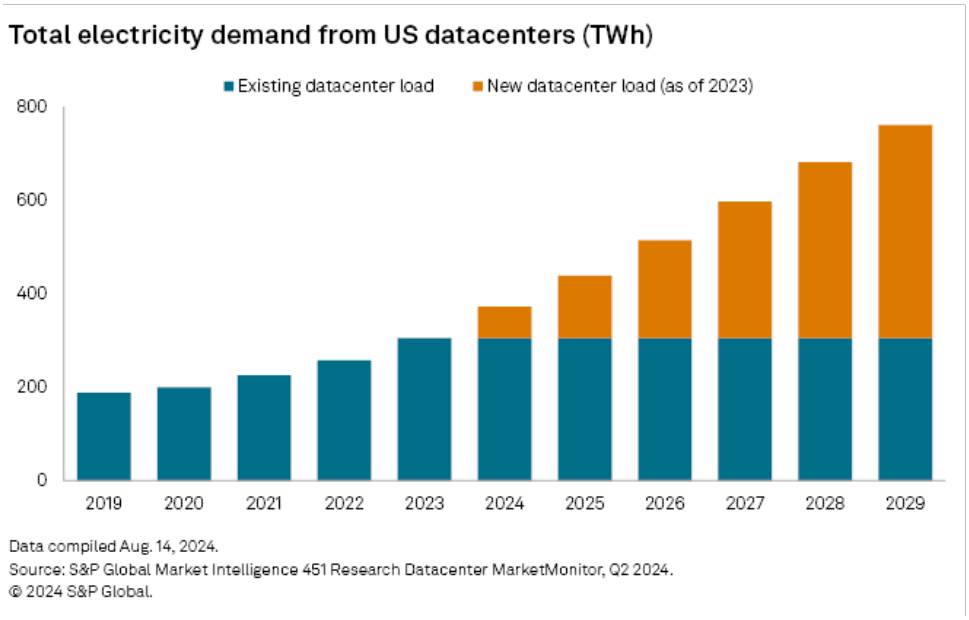
Q: Please describe the large load customer energy landscape, nationally and in Missouri.

A: According to the former Southwest Power Pool ("SPP") Chief Executive Officer, Barbara Sugg: "Demand for electricity is outpacing supply from our generation fleet." See Southwest Power Pool, "Our Generational Challenge: A Reliability Future for Electricity" at 3 (Summer 2024) ("SPP Our Generational Challenge"). The world is entering a transformative era of electrification, driven by the rapid adoption of electric vehicles, expansion of data centers, advancements in artificial intelligence ("AI"), and other emerging demand sources.

The technological renaissance occurring with the proliferation of AI technology and advanced manufacturing technologies has been well publicized. AI technology, combined with the widescale electrification of various industries, and policy and security desires to onshore many of the data centers and manufacturing plants needed to support these advancements, are driving significant electric load growth across the country and globe.[4] Notably, data centers are one of the fastest growing industries worldwide. While national forecasts vary, one thing is clear – the nation is in the midst of the most dramatic

[4] Robert Walton, *Five-year US load growth forecast surges 456%, to 128 GW: Grid Strategies*, Utility Dive, (Dec. 6, 2024).

electricity load growth phases of modern times. According to the North American Electric Reliability Corporation ("NERC") 2023 Long-Term Reliability Assessment, 10-year peak demand growth rates "are higher than at any point in the past decade" and "are increasing more rapidly than at any point in the past three decades."[5] According to the Department of Energy, total energy demand may grow 15-20 percent in the next decade.[6] While this load growth is driven by a variety of new types of loads, data centers are one of the major drivers, with S&P Global Market Intelligence forecasting a near quadrupling of data center demand between 2019 and 2029.



Increased power demand driven by large customers, including data centers, advanced manufacturing and other forms of industrial load, is a national trend.[7] According

[5] North American Electric Reliability Corporation, *2023 Long-Term Reliability Assessment* at 33 (Dec. 2023).
[6] *Clean Energy Resources to Meet Data Center Electricity Demand*, U.S. Dep't of Energy, Office of Policy (Aug. 12, 2024).
[7] See, e.g. Duke Energy, *Chapter NC Supplement*, at 2-3 (2024); Duke Energy, *Chapter SC Supplement* at 35-38 (2024); Georgia Power, *2023 IRP Update*, at 8-10 (Oct. 2023); Arizona Public Service Company, *2023 IRP*, at 18-19 (Nov. 2023); NV Energy, *Joint 2025-2044 IRP, 2025-2027 Action Plan, and 2025-2027 Energy Supply Plan, Vol. 6*, at 3-6 (May 2024); Tennessee Valley Authority ("TVA"), *TVA Plans to Invest $15 Billion Over the Next Three Years to Meet Region's Growth* (Aug. 24, 2023); TVA, *Integrated Resource Plan 2025*, Volume 1 Draft Resource Plan, 1-5 (Sept. 2024).

to one study, the U.S. is expected to be the fastest growing market for data centers, growing from 25 gigawatts ("GW") of demand in 2024 to more than 80 GW of demand in 2030.[8] According to a recent International Energy Agency report, in the U.S., data centers are expected to represent six percent of electricity consumption in 2026,[9] and could consume up to nine percent of U.S. electricity by 2030 – up from four percent in 2024.[10] Additionally, "while tech companies can technically take their power-hungry data centers elsewhere, pressure on the electric grid is mounting all over the country, and many communities are already grappling with how to accommodate it, making it incumbent on the Big Tech companies to find a way to work with utilities…."[11]

In light of this new reality, utilities across the country are working to quickly accommodate new large loads, while maintaining reliability, affordability, and other regulatory and policy objectives.

Q: Is Missouri state policy attempting to attract large load customers?

A: Yes. Missouri governors have recognized the benefits these large load customers bring to our state. Former Governor Mike Parson, as a member of the Missouri Senate, sponsored Missouri's Data Center Sales Exemption program in 2018, now codified as Section 144.810, when it was signed into law by then-Governor Jay Nixon. Thereafter, Governor Mike Kehoe signed Senate Bill 4 ("S.B. 4"), to ensure "safe, reliable, and affordable power is generated right here in Missouri and supporting long-term economic development

---

[8] Alastair Green et al., *How data centers and the energy sector can sate AI's hunger for power*, McKinsey, Sept. 17, 2024

[9] International Energy Agency, *Electricity 2024: Analysis and Forecast to 2026*, at 32 (Jan. 2024).

[10] Electric Power Research Institute, *Power Intelligence: Analyzing Artificial Intelligence and Data Center Energy Consumption*, at 2 (May 28, 2024).

[11] Carolina O'Donovan, *Tech giants fight plan to make them pay more for electric grid upgrades*, The Washington Post (Sept. 13, 2024).

efforts."[12] Governor Kehoe further outlined the importance of S.B. 4 upon signing the bill into law: "With this legislation, Missouri is well-positioned to attract new industry, support job growth, and maintain affordable, reliable energy for our citizens. This is about powering Missouri for Missourians and not relying on other states and countries to produce our power. This legislation strengthens our economic development opportunities, helps secure our energy independence, and provides consumer protections to build a resilient energy future for generations to come. The legislation is designed to respond to skyrocketing energy demand and outdated energy policy, introducing vital reforms to ensure Missouri can meet its growing electricity needs."[13]

Q: Are these Missouri economic development goals per S.B. 4 codified by newly enacted Missouri statutes?

A: Yes. The particularly relevant section is Section 393.130.7 regarding Evergy's development of large load rate tariffs.

Q: Please elaborate on the importance of Section 393.130.7.

A: Section 393.130.7 supports these new large load customers by directing electrical corporations to develop and submit tariffs to ensure that such customers' rates reflect their representative share of incremental costs to serve their demand while preventing unjust and unreasonable rates to other customers. The development of the tariffs gives large load customers transparent, predictable, and consistent consumer protections to evaluate when determining the load's site selection. Overall, Section 393.130.7 signals Missouri's

[12] See *Marked by Decisive Action and Meaningful Progress: Governor Kehoe's First 100 Days* (Apr. 22, 2025).
[13] See Governor Kehoe Signs SB 4 Into Law, Securing Missouri's Energy Future and Economic Growth (Apr. 9, 2025).

readiness to serve transformational loads on non-discriminatory, standardized terms that mitigate cross-subsidy and stranded-cost risks.

Q: Did Evergy develop tariffs pursuant to Section 393.130.7?

A: Yes. As discussed by Company witnesses Darrin Ives (Senior Vice President of Regulatory and Government Affairs) and Kevin Gunn (Vice President of Regulatory and Government Affairs), the Commission approved Evergy's Large Load Rate Plan and Schedule Large Load Power Service, as modified by the Non-Unanimous Stipulation and Agreement, in Case No. EO-2025-0154 because it "establishes reasonable protections and safeguards for Evergy's existing customers" while "ensur[ing] that new large load customers will pay their share of system costs associated with serving new large loads, and provides a competitive rate program that will help drive economic development in Missouri."[14] Evergy's Large Load Rate Plan establishes a transparent framework consistent with emerging national trends for large load customers with clear eligibility, pricing, commitments, safeguards, and optional clean-energy riders, enabling data centers and other large loads to meet sustainability goals without shifting costs. These consumer protections will provide a competitive rate program that will help drive economic development in Missouri. And, as the Commission noted, Evergy "has an obligation to service any customer who requests service within their territory."[15]

Q: What opportunities do these new large loads present for the State of Missouri?

A: According to the global real estate firm Cushman & Wakefield, Kansas City is the leading global emerging data center market among cities including Milan, Italy, and Minneapolis,

[14] See Report & Order at 16, No. EO-2025-0154, *rehearing denied*, Order Denying App. For Rehearing, No. EO-2025-0154 (Jan. 7, 2026).
[15] Id. at 24.

Minnesota.[16] Large manufacturing customers are also likely to find Missouri to be an attractive market in which to locate. Thus, Evergy has a unique opportunity to leverage this unprecedented demand growth for its customers and the State of Missouri.[17] Notably, these new large load customers will drive job creation and increased tax revenues, which fund important services like schools and roads. While data centers may, in some cases, not employ as many individuals as new manufacturing plants, they attract many ancillary businesses, such as construction, food and beverage, and housing. Employees of the prospective large load customer will spend money at local businesses, including restaurants, shops, and entertainment venues, which further stimulates the local economy. New large customer growth will also improve Missouri's economic resiliency by helping diversify Missouri's economic industrial base.

Q: Do large load customers provide benefits to Evergy's electrical system and existing customers?

A: Yes. Large load customers are "economic and operational partners that provide important advantages to electric utilities and their customers."[18] Particularly, the operational advantages of data centers include: "consistent and predictable consumers of energy, which supports more efficient operation and planning of the electric utility grid," enabling "utility system planners and grid operators to optimize existing generation and transmission infrastructure, which can delay new infrastructure investments and improve overall system

[16] Cushman & Wakefield, *Global Data Center Market Comparison,* A Publication of Cushman & Wakefield's Data Center Advisory Group (2024).
[17] See *Governor Kehoe Signs SB 4 Into Law, Securing Missouri's Energy Future and Economic Growth* (Apr. 9, 2025).
[18] See Report & Order at 24, No. EO-2025-0154.

efficiency," and "large load customers engage in demand management, which further enhances grid stability and reliability."[19]

Moreover, these large load customers provide economic advantages to all of Evergy's customers because "their consistent energy usage helps distribute fixed costs across a larger energy volume, which contributes to a lower average cost per kilowatt-hour for all customers."[20]

Q: Is any part of Evergy Missouri West's rate request caused by large load customers?

A: No. As discussed by Company witness Mr. Gunn, the requested rate increase in this case is significantly mitigated by the inclusion of customer growth from new large load customers. In fact, revenues from the LLPS customer class reduce the requested increase by nearly a quarter.[21]

III. LARGE LOAD CUSTOMERS IN THE COMPANY'S SERVICE TERRITORIES

Q: What is Evergy's Path to Power?

A: Path to Power is Evergy's standardized, holistic process for customer intake, evaluating, studying, and interconnecting new loads under the LLPS framework, as approved in Case No. EO-2025-0154, developed to replace individualized efforts with a streamlined, milestone-based approach that improves speed-to-market and enables better system planning. The process applies to new loads of 25 MW or greater and begins once a customer expresses interest in locating in the service territory. Evergy personnel gather information about the project, provide a high-level assessment of the customers' project,

[19] Id.
[20] Id.
[21] Drew Maloney & Matthew DeCourcey, Electric Perspective, The Edison Institute (Feb. 2, 2026); Matthew DeCourcey & Mayank Saraswat, *Retail Rate Trends in the US,* Charles River Associates at 3, 8 (Feb. 2, 2026).

and advise customers on how to navigate the Path to Power process. Projects that seek to continue, then formally submit details about the project, sign a Letter of Agreement, and pay deposits to cover the study costs. Projects completing these steps will then be studied in clusters of up to four active projects to drive administrative efficiency and to facilitate holistic assessment with Southwest Power Pool, while maintaining project-specific cost allocation. At this point, the Company will work with the customer to negotiate and execute the project agreements needed to support the project, including the Electric Service Agreement. The final steps of the Path to Power involve coordination with billing system personnel to ensure the billing systems are configured, and customer-specific data is available to support monthly billing under Schedule LLPS. The basic elements of the Path to Power are memorialized in the Company's General Rules and Regulations.

Q: How does your team coordinate execution of the Path to Power?

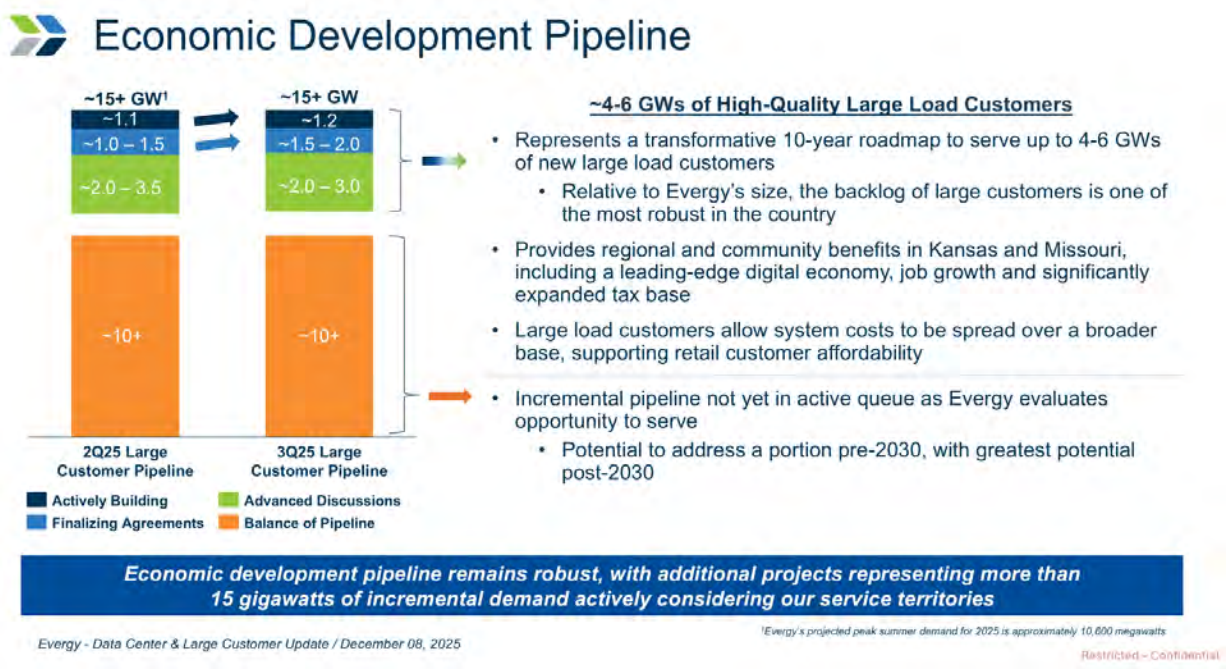
A: My team works closely with Evergy Economic Development personnel, as well as other internal, customer-facing teams to intake potential customers. My team has primary responsibility for the planning, study, and agreement negotiation within the Path to Power. Evergy has a coordinated effort across several teams to ensure Electric Service Agreements are properly executed, and large load customers are integrated into the system per the Path to Power. Generation capacity and energy planning incorporate each project's demand shape, redundancy requirements, and optional clean-energy preferences, while resource adequacy assessments validate that reserves and deliverability are sufficient to meet incremental demand without degrading reliability or affordability for existing customers. Cross-functional governance coordinates siting, permitting, long-lead material procurement, and construction sequencing so that service readiness aligns with required

grid reinforcements. This integrated approach has culminated in Evergy Missouri West's executing Electric Service Agreements that are consistent with, and provide the customer protections contemplated by, the Commission-approved Large Load Power Service Rate Plan, ensuring cost-responsibility and sustainable, reliable service for all customers.

Q: Please describe the pipeline of large load customers interested in locating in Evergy Missouri West's service territory.

A: Evergy Missouri West has engaged in and is currently working with large load customers with more than 1.5 gigawatts of incremental demand that are interested in locating in its service territory. These large load customers include both data centers and large manufacturing customers, all of which stand to bring benefits to the State, in accordance with Governor Kehoe's economic development policies. These prospective customers are at various stages of the Company's "Path to Power" process, as approved by the Commission in Evergy's LLPS Case. Evergy Missouri West is diligently collaborating with these large load customers to ensure their needs are met while maintaining system reliability and cost-effectiveness for all customers. The Company will continue to incorporate these prospective loads into its integrated resource plan to ensure accurate forecasting and prudent resource development necessary to provide EMM customers with safe and adequate service which accurately reflects the customers' representative share of the costs incurred to serve them. Figure 1 provides a comprehensive overview of the current and anticipated large load projects in Evergy's economic development and load pipeline currently active in the Path to Power process. It illustrates the scale and diversity of prospective customer engagements at various stages of the Path to Power process, such as advanced discussions and the finalization of Electric Service Agreements.

FIGURE 1



IV. CONCLUSION

Q: Please summarize your testimony.

A: In conclusion, Evergy Missouri West is experiencing an unprecedented surge in electricity demand, a trend mirrored across the nation. This growth is primarily driven by the expansion of data centers, advancements in AI, and broader industrial electrification. My testimony explains Evergy's process, planning, and oversight toward meeting the needs of these prospective new customers and describes the significant impacts of these new and prospective large load customers on Evergy Missouri West's service territory and the opportunities they present for economic development and energy security.

Q: Does that conclude your testimony?

A: Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Request for Authority to Implement A General Rate Increase for Electric Service	))))	Case No. ER-2027-0077

AFFIDAVIT OF ZAC GLADHILL

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Zac Gladhill, being first duly sworn on his oath, states:

1. My name is Zac Gladhill. I work in Kansas City, Missouri and I am employed by Evergy Metro, Inc. as Vice President – Strategy and Long-Term Planning.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Missouri West consisting of thirteen (13) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

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

Zac Gladhill

Subscribed and sworn before me this 3rd day of November 2026.

Notary Public

My commission expires: April 26, 2029

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