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Evergy Missouri Metro – Exhibit 14
Surrebuttal Testimony of Cody VandeVelde
Case No. EA-2026-0154

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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EA-2026-0154

SURREBUTTAL TESTIMONY

OF

CODY VANDEVELDE

ON BEHALF OF

EVERGY MISSOURI METRO

Kansas City, Missouri
October 2026

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SURREBUTTAL TESTIMONY

OF

CODY VANDEVELDE

Case No. EA-2026-0154

I. INTRODUCTION AND EXECUTIVE SUMMARY

Q: Are you the same Cody VandeVelde who filed direct testimony in this case on May 14, 2026?

A: Yes. I previously submitted direct testimony on behalf of Evergy Metro, Inc. ("Evergy Metro") d/b/a Evergy Missouri Metro ("Evergy Missouri Metro," "EMM," or the "Company"). Evergy Metro's Integrated Resource Plan ("IRP") covers both EMM and Evergy Kansas Metro, and I use Evergy Metro when I refer to the IRP and its results.

Q: What is the purpose of your surrebuttal testimony?

A: I discuss the Non-Unanimous Stipulation and Agreement ("Agreement") filed by Evergy Missouri Metro, Staff of the Commission ("Staff"), Renew Missouri Advocates d/b/a Renew Missouri ("Renew Missouri"), and Midwest Energy Consumers Group ("MECG") (collectively the "Signatories"). I also respond to the Office of the Public Counsel ("OPC") witnesses Jordan Seaver and Geoff Marke. I address the IRP process and how Evergy Metro's 2024 Triennial IRP, 2025 IRP Annual Update, and 2026 Annual IRP Update establish the basis for both the need for and the economic feasibility of Mullin Creek Unit #2 Energy Center ("Mullin Creek #2" or the "Project"), the claim that the Project is needed solely because of large-load customers.

Q: Please summarize your surrebuttal testimony.

A: No party disputes that Evergy Metro needs additional accredited capacity, and no party asks the Commission to deny the Application.[1] As discussed in my direct, the 2031 combustion turbine was selected in the lowest cost resource plan in every scenario tested across two consecutive annual IRPs, including coal retirement schedules and futures built on low and high carbon prices and low and high natural gas prices.[2] In Evergy Metro's 2024 Triennial IRP Update Preferred Plan there was an identified need for a simple cycle gas turbine in 2032. In Evergy Metro's 2025 IRP Annual update and in the 2026 IRP Annual Update, Evergy Metro identified a need for the Project one year earlier in 2031. Both the 2025 and 2026 IRPs tested alternative resource plans ("ARP") that removed the Project, and all those ARPs increased the Company's net present value revenue requirement ("NPVRR").[3] No party identifies a plan that would serve customers for less.

II. THE STIPULATION AND AGREEMENT

Q: Which provision of the Agreement addresses an issue within your testimony?

A: The Signatories have agreed that EMM must consider alternative battery configurations (6- or 8-hour) in future IRP analysis until its first IRP under Section 393.1900, as well as not constrain IRP modeling to build ½ CC per year until the first IRP under newly enacted Section 393.1900.[4] Additionally, the Company has agreed to develop a plan identifying potential opportunities for additional customer-sited non-thermal capacity resources within 12-months

[1] See Johnson Rebuttal at 16; Seaver Rebuttal at 14; Marke Rebuttal at 1.
[2] See C. VandeVelde Direct at 5-6.
[3] Id.
[4] See Non-Unanimous Stipulation & Agreement at ¶ 9, 22, Case No. EA-2026-0154 (EFIS No. 56; Oct. 2, 2026) ("Agreement").

after the Effective Date of the Commission's order. The plan will address implementation feasibility, deployment considerations, and potential next steps.

Moreover, EMM has agreed to notify Staff in the compliance docket and provide supporting contract documentation, including all terms, for any capacity purchases made for planning seasons before the Project is placed in-service that were not included in the 2026 IRP preferred plan. Collectively, these commitments expand EMM's long-term resource planning by requiring broader evaluation of alternatives and expanding build assumptions for combined-cycle modeling, while increasing transparency into interim capacity decisions.[5]

III. OFFICE OF THE PUBLIC COUNSEL

Q: How do you respond to the criticisms of Evergy Metro's resource planning process?

A: OPC asks the IRP to perform analyses the Commission's 20 CSR 4240-22 does not require or treat the absence of a particular sensitivity as evidence that the preferred plan is wrong.[6] Neither criticism engages with the results of the Company's IRPs. The Project was selected in every scenario in which it was available, and the plans without it are less economically feasible.

Q: What metric does the Commission's resource planning rule direct Evergy Metro to use?

A: The Commission's resource planning rule directs the utility to use minimization of the present worth of long-run utility costs as the primary selection criteria, comparing demand-side and supply-side resources on an equivalent basis.[7] Evergy Metro performs its IRP using minimization of the NPVRR as the primary objective function consistent with this requirement.

Q: Is NPVRR the only consideration in selecting a preferred plan?

A: No. The fundamental objective is energy service that is safe, reliable, and efficient, at just and reasonable rates, in compliance with all legal mandates and consistent with state energy and

[5] See Agreement at ¶ 14.
[6] See Seaver Rebuttal at 14;
[7] 20 CSR 4240-22.010(2)(B).

environmental policies.[8] NPVRR is the primary selection criterion, not the sole one. In addition, Evergy Metro's generation planning reflects four overarching objectives: ensuring system reliability; meeting increased capacity and energy requirements economically; addressing economic development needs; and transitioning the generation portfolio by responsibly utilizing a balanced resource mix.

Q: Has the Commission reviewed Evergy Metro's resource planning?

A: Yes. The Commission found that Evergy Missouri Metro's 2024 Triennial IRP filing and 2025 IRP Annual Update and their resource acquisition strategies, comply with the requirements of Commission Rule 20 CSR 4240-22.[9] The 2026 Annual Update was developed through that same process.

Q: Is the need for Mullin Creek #2 caused solely by large-load customers?

A: No. OPC contends that the addition of the Project is "solely due to the addition of the large load customers."[10] OPC also seems to confuse Evergy Metro's 2026 IRP explaining the year-over-year changes as evidence showing that planning reserve margin and ELCC changes are not the main cause of capacity deficiency.[11] The ELCC and planning reserve margin changes explained in Evergy Metro's 2026 IRP were intended to detail the planning assumption changes over the last year (from 2025 to 2026). What OPC fails to acknowledge is that SPP resource adequacy policy changes, and the expected impacts for generation planning, have been studied in previous iterations of Evergy Metro's IRPs. The SPP resource adequacy changes were a driver in the capacity deficiency that caused the need for a simple cycle gas turbine in the early-2030s in the 2024 and 2025 IRPs. OPCs focus of the year-over-year

[8] See 20 CSR 4240-22.010(2); C. VandeVelde Direct at 3.
[9] See Order Approving 2024 Triennial IRP at 9, In re Evergy Missouri Metro's 2024 Triennial Compliance Filing, No. EO-2024-0153 (Dec. 4, 2024); Notice Closing Case at 1, In re Evergy Missouri Metro's 2025 Integrated Resource Plan Annual Update Filing, No. EO-2025-0250 (July 7, 2025).
[10] See Seaver Rebuttal at 14.
[11] See Seaver Rebuttal at 5-7.

planning changes in the 2026 IRP doesn't capture the full story of Evergy Metro's changing capacity needs over multiple years as SPP policy has evolved.

As discussed in my direct testimony and Staff witnesses' rebuttal testimonies, the Project "is needed for resource adequacy driven by large load growth and changing SPP requirements."[12] SPP is raising reserve margins, reducing accreditation, and imposing penalties for missing winter requirements, with winter planning reserve margin requirements rising from 36 percent to 38 percent by winter 2029/30.[13] If Evergy does not satisfy its capacity requirement, it "may be assessed a financial penalty from SPP."[14] Therefore, EMM needs the Project.

Q: Why have Evergy Metro's scheduled thermal additions grown between the 2024 IRP and the 2026 Annual Update?

A: Because conditions changed. OPC treats the aggregate growth, which it calculates at 818 MW, as evidence that the planning is unreliable.[15] Between EMM's 2024 Triennial IRP and its 2026 IRP Annual Update, SPP approved minimum winter and summer planning reserve margin requirements, implemented a winter resource adequacy requirement, and moved to performance-based accreditation.[16] Large-load customers met Evergy Metro's criteria for base load inclusion, and construction costs for new gas generation rose.[17] A plan unchanged across those developments would not provide customers with safe and adequate service.

[12] See Tevie Rebuttal at 2; C. VandeVelde Direct at 6; Arandia Rebuttal at 5; Rucker Rebuttal at 18.
[13] See C. VandeVelde Direct at 7, 11.
[14] See Tevie Rebuttal at 2.
[15] See Seaver Rebuttal at 8-11.
[16] See C. VandeVelde Direct at 7, 11.
[17] Id. at 12-14.

Q: Is the Project necessary for Evergy Metro to provide safe and adequate service?

A: Yes.[18] OPC contends that the Project is not necessary to serve existing ratepayers.[19] Evergy Metro does not plan its system for a subset of its customers. It plans to meet forecasted peak demand against the resource adequacy requirements SPP imposes on it, and its summer peak is forecast to grow from approximately 3.7 GW in 2026 to 4.6 GW by 2032.[20]

V. CONCLUSION

Q: Should the Commission approve EMM's CCN request?

A: Yes. The Commission should approve EMM's CCN request for Mullin Creek #2 because Evergy Metro needs the additional accredited capacity. Mullin Creek #2 has been identified throughout several Evergy Metro's IRPs because it is an economically feasible resource that is needed to satisfy EMM's capacity as well as provide safe and adequate energy to all customers. Evergy Metro strategically allocated resources across its operating companies, aligning Mullin Creek #2 with Evergy Missouri Metro to address EMM's capacity deficit.

Q: Does that conclude your testimony?

A: Yes, it does.

[18] See Arandia Rebuttal at 5; Rucker Rebuttal at 11; Johnson Rebuttal at 16.
[19] See Marke Rebuttal at 16.
[20] See C. VandeVelde Direct at 6.

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 Construct, Install, Own, Operate, Manage, Maintain, and Control a Natural Gas Electrical Production Facility	)))))))	Case No. EA-2026-0154

AFFIDAVIT OF CODY VANDEVELDE

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Cody VandeVelde, being first duly sworn on his oath, states:

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

2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Evergy Missouri Metro consisting of six (6) 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.

Cody VandeVelde

Subscribed and sworn before me this 5th day of October 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