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

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| In the Matter of the Application of<br>Evergy Missouri West, Inc. d/b/a Evergy<br>Missouri West for Permission and Approval of<br>a Certificate of Public Convenience and<br>Necessity Authorizing It to Purchase, Own,<br>Operate, Maintain and Otherwise Control<br>and Manage an Existing Wind Generation<br>Facility in Oklahoma | )<br>)<br>)<br>)<br>)<br>)<br>)<br>) | Case No. EA-2022-0328 |

**NOTICE OF ERRATA TO SURREBUTTAL TESTIMONY OF JASON HUMPHREY**

**COMES NOW**, Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("EMW", "Evergy" or the "Company"), and for its *Notice of Errata to Surrebuttal Testimony of Kayla Messamore* ("Errata"), states as follows:

1. On January 31, 2023, the Company filed the surrebuttal testimony of Jason Humphrey ("Humphrey Surrebuttal").

2. After filing, the Company discovered several minor errors that need to be corrected, as follows:

**p. 7, lns. 13-16:**

[…]*The first is the Plant-In-Service Accounting ("PISA")statute*[5] *which allows for PISA deferral on generation investment solely for renewable resources. The second supportive policy encouraging investment and acknowledging the renewable transition is Missouri's securitization statute*[6] *which allows for*[…]

**p. 7, footnote 6:**

[6] *See § 393.1700.1 (~~13~~7), RSMo.*

**p. 18, ln. 16:**

*Staff witness ~~Lange~~ Luebbert states: "Evergy assumed consistent energy production*[…]

3. For the parties' convenience, attached hereto are copies of updated pages 7 and 18 of the Humphrey Surrebuttal containing the corrections shown in redline above.

4. The Company does not believe submitting these corrections will prejudice any party's ability to address the underlying testimony at hearing.

**WHEREFORE**, the Company submit this Errata to the Missouri Public Service Commission ("Commission").

Respectfully submitted,

*/s/ Roger W. Steiner*

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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served upon counsel for all parties on this 3rd day of February 2023, by either e-mail or U.S. Mail, postage prepaid.

/s/ Roger W. Steiner
Roger W. Steiner

## II. Corporate and State Renewable Resource Goals

**Q: Witness Luebbert discuses corporate renewable goals in his testimony. Does the Company have corporate renewable goals?**

A: No. The Company has targeted a 70% reduction from 2005 CO2 emissions levels by 2030 and net-zero by 2045, but has no specific renewables goals. Renewables are very likely to be a large portion of the achievement of those reduction goals, but other non-carbon emitting forms of generation are likely to be part of the solution as well.

**Q: Does Missouri have state-level renewables goals?**

A: Yes. In addition to the Renewable Energy Standard ("RES"),[4] Missouri has also adopted policy at the state level in support of renewable energy additions. Two key pieces of legislation have been adopted by the state to support the overall transition to renewables. The first is the Plant-In-Service Accounting ("PISA") statute[5] which allows for PISA deferral on generation investment solely for renewable resources. The second supportive policy encouraging investment and acknowledging the renewable transition is Missouri's securitization statute[6] which allows for securitization treatment on "Energy Transition Costs." Energy Transition Costs are intended for the costs of a prudent asset retirement to be recovered quickly through a securitized utility tariff bond, which would then allow the utility to invest those proceeds into investments that support the energy transition.

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[4] Renewable Energy Standard Requirements, 20 CSR 4240-20.100.
[5] 393.1655 RSMo.
[6] *See* § 393.1700.1 (7), RSMo.

supported by three years of actual performance, to select for this LCOE evaluation. It has naturally been variable year to year, month to month, and day to day. Regardless of this expected variation, the site has maintained an ~50% NCF.

However, as I will discuss later in my testimony, when site performance is updated to include the full year of 2022, this historical performance is reaffirmed. This is important to note in light of Staff witness Luebbert's assertion that the NCF is inflated and the PTC value is over-estimated.[16] While naturally variable, the site performance is very consistent around the ~50% level, with the capacity factor in 2022 being higher than 2021.

**Q: Is it disputed that Persimmon Creek has the lowest LCOE of the evaluated projects? Did inclusion of the impacts of the IRA change that conclusion?**

A: No, it is not. In fact, Staff witness Luebbert admits that LCOE and this method were consistently used to evaluate alternatives and make an asset selection. The LCOE analysis was performed equally across the options by using the P50 value for projects to be constructed and the actual, historical, NCF for Persimmon Creek. Staff witness Luebbert states: "Evergy assumed consistent energy production throughout the asset life to evaluate the LCOE of multiple projects associated with the response to the Company's request for proposals."[17] In fact, if the Company had done anything differently, such as assumed curtailments for negative pricing five to twenty years in the future, the analysis would have been immediately "apples and oranges" with the Company taking a point of view on what will happen at a specific node far into the future on a different grid, with a different market, and

[16] Luebbert Rebuttal, at 41.
[17] Luebbert Rebuttal, at 42-43.