

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

In the Matter of Evergy Metro Inc., d/b/a)	
Evergy Missouri Metro’s 2025)	Case No. EO-2025-0250
Integrated Resource Plan Annual Update)	
Filing)	

In the Matter of Evergy Missouri West,)	
Inc., d/b/a Evergy Missouri West’s 2025)	Case No. EO-2025-0251
Integrated Resource Plan Annual Update)	
Filing)	

COMMENTS OF THE COUNCIL FOR THE NEW ENERGY ECONOMICS

COMES NOW, the Council for the New Energy Economics (“NEE”), and pursuant to 20 CSR 4240-22.080(3)(D) respectfully submits the attached Comments regarding Evergy Metro, Inc., d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc., d/b/a Evergy Missouri West’s (together, “Evergy”) 2025 Integrated Resource Plan (“IRP”) Annual Update.

1. NEE is a non-profit organization committed to helping utilities and energy decision-makers navigate rapidly evolving utility industry economics using neutral data and analysis. NEE’s mission is to present stakeholders and decision-makers with complex utility system modeling analysis to assist in determining the most cost-effective path forward for the deployment of energy resources. NEE has consistently participated in Evergy’s IRP proceedings, including Triennial Filings and Annual Updates, dating back to the 2021 Triennial IRP.¹ Pursuant to the Commission’s March 14, 2025, *Order Recognizing Parties*, NEE is a party to these Annual Update proceedings.²

2. Upon review of Evergy’s Annual Update filing, NEE has identified the following deficiencies and concerns:

¹ Missouri Public Service Commission (“PSC”) Docket Nos. EO-2021-0035 and EO-2021-0036.

² Missouri PSC Docket Nos. EO-2025-0250 and EO-2025-0251, *Order Recognizing Parties* (Mar. 14, 2025).

Deficiency	Chapter 22 Citation	Proposed Remedy
Capital Cost Assumptions – Cost Scenario Approach	20 CSR 4240-22.040(5) Supply-Side Resource Analysis	Evergy should update the approach to capital cost scenario weighting to reflect the higher likelihood of base and high scenarios.
New Wind Resource Costs	20 CSR 4240-22.040(5) Supply-Side Resource Analysis	Evergy should provide clarity around its approach to new wind build assumptions, and consider a broader use of submitted bids to include lower capacity factor and all COD submissions.
Natural Gas Price Forecast	20 CSR 4240-22.040(5) Supply-Side Resource Analysis	Evergy should update natural gas price forecasts and raise the risk weighting of high-case gas price scenarios.
New Thermal Resource Ownership Options	20 CSR 4240-22.040(3) Supply-Side Resource Analysis	Evergy should model a wider variety of ownership structures when considering new thermal plants.
Fuel Cost Causation and Fair Cost Allocation in Rate Setting	20 CSR 4240-22.030(4)(A) Load Analysis and Load Forecasting 20 CSR 4240-22.060(5) Integrated Resource Plan and Risk Analysis	Evergy’s IRP should address fair adjustment clause cost allocation that considers which customers’ new loads may be causing increased fuel costs.
Large Load Forecasting and Planning Reserve Margin	20 CSR 4240-22.030(5), (6), (7) & (8) Load Analysis and Load Forecasting 20 CSR 4240-22.060(5) Integrated Resource Plan and Risk Analysis	Evergy should include updated SERVVM analysis to ensure portfolios meet reliability criteria as large loads are added.

Large Load Pipeline Reporting	20 CSR 4240-22.030(5), (6), (7) & (8) Load Analysis and Load Forecasting 20 CSR 4240-22.060(5) Integrated Resource Plan and Risk Analysis	The Commission should establish a quarterly large load reporting requirement within the IRP to provide valuable and current information to the Commission and the Company.
Interconnection Study Process Improvements	20 CSR 4240-22.040(3) Supply-Side Resource Analysis 20 CSR 4240-22.045 Transmission and Distribution Analysis	The Commission and Evergy should clarify in facility interconnection requirements whether the outlined Transmission Protection Requirements apply to large loads and which other specific studies are required for large loads, such as whether harmonic distortion, voltage flicker, power factor, voltage fluctuation, and ferroresonance risk assessment are formally required for large load interconnection requests, and make modeling requirements explicit including specifying required types of modeling data.

3. Each of these deficiencies and concerns, as well as NEE’s recommendations, are discussed in the attached Comments, which were prepared jointly by NEE and its consultant, Energy Futures Group (“EFG”).

4. In accordance with Evergy’s previous designations of confidential information, NEE provides a Confidential and Public version of the attached Comments. Confidential information is marked with asterisks, highlighting, and underline.

WHEREFORE, NEE respectfully requests that the Commission accept these Comments and to grant it any other relief the Commission deems reasonable and appropriate.

Respectfully submitted,

/s/ Alissa Greenwald

Alissa Greenwald, Mo. Bar. No. 73727

KEYES & FOX LLP

1580 Lincoln St., Suite 1105

Denver, CO 80203

Telephone: (913) 302-5567

agreenwald@keyesfox.com

ATTORNEY FOR THE COUNCIL FOR THE
NEW ENERGY ECONOMICS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all counsel of record by email this 7th day of May, 2025.

/s/Alissa Greenwald
Alissa Greenwald