

## Exhibit No. 9

Exhibit No.:  
Issue: Application; Projects Overview  
Witness: Kevin D. Gunn  
Type of Exhibit: Supplemental Direct Testimony  
Sponsoring Party: Evergy Missouri West & Evergy Missouri Metro  
Case No.: EA-2025-0075  
Date Testimony Prepared: February 19, 2025

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO.: EA-2025-0075**

**SUPPLEMENTAL DIRECT TESTIMONY**

**OF**

**KEVIN D. GUNN**

**ON BEHALF OF**

**EVERGY MISSOURI WEST AND EVERGY MISSOURI METRO**

**Kansas City, Missouri  
February 2025**

## TABLE OF CONTENTS

I.	INTRODUCTION AND EXECUTIVE SUMMARY .....	1
II.	DECISION TO ALLOCATE 50% OF MCNEW TO EVERGY WEST .....	4
III.	FACTUAL SUPPORT FOR ALLOCATING 50% INTEREST IN MCNEW TO EVERGY WEST UNDER CCN Rule AND <i>TARTAN</i> FACTORS .....	7
1.	EMW Needs McNew .....	11
2.	EMW's Being Allocated the McNew Plant is Economically Feasible.....	12
3.	EMW Has the Ability to Finance the Construction of McNew .....	13
4.	EMW's Allocation of a 50% Share in McNew Serves the Public Interest.....	13
IV.	SUPPLEMENTAL SUPPORT FOR EVERGY MISSOURI WEST'S 50% INTEREST IN VIOLA AND 100% INTEREST IN MULLIN CREEK # 1 UNDER CCN RULE AND THE <i>TARTAN</i> FACTORS .....	14
V.	MISCELLANEOUS LEGAL AND FACTUAL UPDATES/REQUESTS.....	16

**SUPPLEMENTAL DIRECT TESTIMONY**

**OF**

**KEVIN D. GUNN**

**CASE NO. EA-2025-0075**

**I. INTRODUCTION AND EXECUTIVE SUMMARY**

**Q: Are you the same Kevin D. Gunn who filed direct testimony in this case on November 15, 2024?**

A: Yes. I previously submitted direct testimony on behalf of Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West” or “EMW”) and Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Metro” or “EMM”) (collectively referred to as the “Applicants” or the “Companies”). The Companies, along with Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (“Evergy Kansas Central” or “EKC”), are the operating utilities of Evergy, Inc. (“Evergy”).

**Q: What is the purpose of your supplemental direct testimony?**

A: I explain in summary fashion why Evergy decided to allocate 50% of the McNew Generating Station (“McNew”) to Evergy Missouri West and 50% to Evergy Kansas Central in accordance with the decision framework described in my Direct Testimony.<sup>1</sup> I discuss how the decision to allocate this facility to Evergy Missouri West meets the requirements set forth in the Commission’s Certificate of Convenience and Necessity (“CCN”) Rule, 20 CSR 4240-20.045 et. seq. (“CCN Rule”), as well as the traditional standards used by the Commission, known as the *Tartan* factors.

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<sup>1</sup> See Kevin Gunn Direct Testimony at 30-31.

1 I testify that granting Evergy Missouri West's request for a CCN to own, operate,  
2 and maintain its share of McNew is not detrimental to the public interest and is prudent  
3 because this plant will provide significant customer benefits and help satisfy EMW's future  
4 capacity requirements based upon the Company's most recent Integrated Resource  
5 Planning ("IRP") analysis and conclusions. I also explain why the Commission should  
6 determine that Evergy Missouri West's decision to be allocated 50% of the McNew plant  
7 is prudent under Section (2)(C) of the CCN Rule.

8 Finally, I summarize the updates to the information previously provided in the  
9 Application and direct testimony as it relates to EMW's 50% interest in the Viola  
10 Generating Station ("Viola") and its 100% interest in Mullin Creek Unit #1 Generating  
11 Station ("Mullin Creek # 1"). I also summarize other updates to miscellaneous legal and  
12 factual matters covered in the Companies' application and testimony filed in November  
13 2024.

14 **Q: Are there other witnesses filing supplemental direct testimony?**

15 A: Yes. In addition to my testimony, the following witnesses are also providing supplemental  
16 direct testimony in conjunction with the Company's Application in this case:

17 (1) Jason Humphrey, Vice President of Development, provides testimony  
18 regarding the competitive bidding process pertaining to the Company's  
19 selection of its Engineering, Procurement, and Construction ("EPC")  
20 contractor. Mr. Humphrey also addresses Evergy's selection of the Power  
21 Island Equipment ("PIE") and Generator Step-Up ("GSU") Transformers.  
22 Finally, Mr. Humphrey addresses the development environment broadly

1 and discusses the potential implications of very recently announced federal  
2 actions.

3 (2) John Grace, Senior Director of Corporate Planning and Financial  
4 Performance, testifies regarding EMW's ability to finance its 50% share of  
5 the McNew plant, as well as updates regarding EMW's ability to finance its  
6 50% share of the Viola plant and 100% of Mullin Creek #1 through the  
7 Company's existing debt and equity financing structure.

8 (3) Kyle Olson, Director of Conventional Generation and Construction,  
9 provides updated cost estimates regarding the Viola and Mullin Creek # 1  
10 plants, as well as for the McNew plant. Mr. Olson also addresses the  
11 updated costs estimates, PIE, and GSUs for McNew, Viola, and Mullin  
12 Creek # 1. Finally, Mr. Olson discusses how Evergy has yet to select an  
13 EPC contractor for the Projects.

14 (4) Cody VandeVelde, Senior Director, Corporate Strategy and Long-Term  
15 Planning, testifies regarding Evergy's updated resource planning modeling  
16 analysis and results for Evergy Missouri West since the Application and  
17 direct testimony were filed in November 2024. He explains allocating  
18 McNew's capacity to Evergy Missouri West fits within its overall capacity  
19 plan, as well as how Viola and Mullin Creek #1 continue to satisfy EMW's  
20 capacity requirements. Additionally, Mr. VandeVelde will provide  
21 testimony regarding the expected influx of large customers into Evergy's  
22 service territories and the impact that those customers' need for energy will  
23 have on Evergy Missouri West's need for these projects. Finally, Mr.

VandeVelde addresses how McNew, Viola, and Mullin Creek # 1 are reasonable and cost effective given their updated cost estimates.

**Q: Given the changes in the Executive Branch of the U.S. Government, will President Trump’s recently issued executive orders adversely affect the requests of Evergy Missouri West in this proceeding?**

A: No, not based on what I have read to date. The executive order issued on January 20, 2025, entitled “Declaring a National Energy Emergency”<sup>2</sup> seeks to support a reliable supply of energy and promote the integrity of the electrical grid.

Similarly, the executive order “Unleashing American Energy,”<sup>3</sup> also issued on January 20, 2025, supports the generation of reliable and affordable electricity, as well as the construction of critical energy infrastructure that would ensure an abundant supply of reliable energy. Both of these executive orders are consistent with the requests that Evergy has submitted to the Commission. However, as Jason Humphrey points out, new tariffs may increase cost and create additional uncertainty for the project teams to manage throughout the development cycle.

## **II. DECISION TO ALLOCATE 50% OF MCNEW TO EVERGY WEST**

**Q: Why has Evergy decided to allocate 50% of the McNew plant to Evergy West?**

A: As the Commission will recall, the McNew natural gas-fired generation facility is an advanced-class 710-megawatt (“MW”) combined-cycle combustion turbine (“CCGT”) plant that Evergy plans to construct in Reno County, Kansas, near Hutchinson, by January 1, 2030.

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<sup>2</sup> Exec. Order No. 14156, 90 Fed. Reg. 18, 8433 (Jan. 29, 2025) (“Declaring a National Energy Emergency”).

<sup>3</sup> Exec. Order No. 14154, 90 Fed. Reg. 18, 8353 (Jan. 29, 2025) (“Unleashing American Energy”).

1           When the Companies filed their Application and direct testimony in November  
2           2024, they were unsure whether EKC, EMM, or EMW would be allocated a 50%  
3           ownership in McNew. Since that time, Evergy has conducted an updated resource planning  
4           modeling analysis, referred to as the “CCN Supplemental Direct” modeling and described  
5           in detail by Company witness VandeVelde. The CCN Supplemental Direct modeling made  
6           updates to include: (1) alignment of DSM profiles to recent Commission Orders regarding  
7           MEEIA Cycle 4, (2) assessment of the SPP’s most recent resource adequacy requirements,  
8           (3) updated load forecasts, and (4) updated construction costs and attributes of combined  
9           cycle and simple cycle natural gas generation resources.

10           As discussed in detail by Mr. VandeVelde, Evergy has concluded that it is prudent  
11           for EMW to own a 50% interest in McNew, with Evergy Kansas Central owning the  
12           remaining 50% interest.

13   **Q:    Can you please describe the decision-making process utilized to arrive at the decision**  
14   **to allocate the second 50% of the McNew CCGT facility to EMW?**

15   A:    Yes. As stated in my Direct Testimony at page 30 and 31, the second 50% of the McNew  
16   CCGT facility would be transferred to EMW only if all of the three stated conditions were  
17   met, which were:

- 18           i. The addition of an incremental large load customer under evaluation is confirmed  
19           to be located in EMW territory and EMW is responsible for developing capacity  
20           resources to meet the new load;
- 21           ii. EMW is able to complete transmission infrastructure upgrades in time to  
22           accommodate the new large load customer’s planned load ramp; and
- 23           iii. EMW is able to finance the construction and ownership of the 50% allocation.



1   **Q:    Have those three conditions been met?**

2    A:    Yes, all three conditions have been met to allocate a 50% share of McNew to EMW. As  
3       outlined in the Supplemental Direct Testimony of Cody VandeVelde, the Company  
4       reviewed and considered a number of factors that can play a role in impacting resource  
5       need among the various affiliates, EKC, EMM, and EMW. These factors included, but were  
6       not necessarily limited to, likely load additions and future demand projections, as well as  
7       flexibility within each affiliate's portfolio. Although no particular load addition or additions  
8       anticipated by any affiliate drove the decision, the Company did analyze likely load  
9       additions in each affiliate's territory, which included an Attachment AQ assessment with  
10      Southwest Power Pool. Ultimately, the analysis concluded that all of the three affiliates had  
11      sufficient future load and additional demand to support allocation of the second half of the  
12      McNew facility.

13               However, EKC and EMM demonstrated that they have a later need for the  
14      additional capacity or have more flexibility with respect to other generation assets,  
15      including possible flexibility to delay retirement of some assets. This flexibility would  
16      enable EKC and EMM to more readily meet their customers' needs without the addition of  
17      the second half of the McNew facility. In addition, EMW not only presented less flexibility  
18      than the other two candidate affiliates, but it also has the most acute need for the additional  
19      generation.

20               The second half of the McNew facility is critical to EMW because an incremental  
21      large load is coming to its service territory within a few years and will require a significant  
22      amount of energy. As Company witness VandeVelde describes, the customer informed  
23      large load profile that is included in the CCN Supplemental Direct load forecast has not

1        been publicly announced or confirmed at this point. However, it has completed Evergy's  
2        internal review process that allows the Company to complete due diligence on large load  
3        customer requests, sets forth numerous data points to vet the feasibility of the customer  
4        locating in Evergy's service territory, and requires a sizeable deposit to support analysis to  
5        study the viability of the customer's project. Additionally, in January 2025 the load  
6        addition was submitted to the Attachment AQ process at the SPP to study the transmission  
7        upgrade requirements.

8                Along with the other drivers identified in Company witness VandeVelde's  
9        Supplemental Direct Testimony, McNew is necessary for EMW to satisfy EMW's  
10       increased load ramp in 2030 and market bridge capacity. Based on these factors, the  
11       decision to allocate the second half of the McNew facility to EMW is prudent.

12       **III.     FACTUAL SUPPORT FOR ALLOCATING 50% INTEREST IN MCNEW TO**  
13       **EVERGY WEST UNDER CCN Rule AND TARTAN FACTORS**<sup>4</sup>

14       **Q:     Please provide an overview of the regulations that apply to the Company's CCN**  
15       **Application.**

16       A:     The Missouri Public Service Commission's (the "Commission") CCN Rule requires a  
17       CCN for an electric utility to construct an electric generating plant under Section  
18       393.170.1. A CCN is required if an "electric generating plant ... is expected to serve  
19       Missouri customers and be included in the rate base used to set their retail rates regardless  
20       of whether the item(s) to be constructed or operated is located ... inside or outside  
21       Missouri; ...." See 20 CSR 4240-20.045(1)(A)1 & (2)(A)3.<sup>5</sup> The McNew project will be

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<sup>4</sup> In re Tartan Energy Co., No. GA-94-127, 1994 WL 762882 (Mo. P.S.C. 1994).

<sup>5</sup> See Kevin Gunn Direct at 14.

constructed in Kansas but will serve Missouri customers. EMW anticipates, upon approval from the Commission, that McNew will be included in the utility's retail rates.

**Q: Are there sections of your testimony pertaining to McNew that need updated in regard to the CCN Rule?**

A: Yes. EMW will provide updates to the following sections of the CCN Rule, as stated in its Application and direct testimony filing.

1. Section (6)(C) – Company witness Mr. Kyle Olson provides further detail on the necessary updates for this section.

2. Section (6)(F) – Company witness Mr. John Grace provides further detail on the necessary updates for this section.

3. Section (6)(G) – Company witnesses Mr. Cody VandeVelde provides further detail on the necessary updates for this section.

4. Section (6)(H) – Company witnesses Mr. Kyle Olson and Mr. Jason Humphrey provides further detail on the necessary updates for this section.

**Q: Per Section (6)(C) of the CCN Rule, please provide any cost estimates that need to be updated for McNew.**

A: As discussed in detail by Company witness Mr. Olson, Every received two Engineering, Procurement, and Construction (“EPC”) bids and has analyzed those bids to produce an updated cost estimate for the McNew facility. The updated cost estimate for McNew, set forth in Mr. Olson's Supplemental Direct Testimony, was close to the cost estimate previously provided in the Company's November filings.

1 **Q: Are there any additional updates pertaining to cost estimates that need to be provided**  
2 **regarding McNew?**

3 A: Yes. As discussed further by Mr. Olson and Mr. Humphrey, EMW has finalized a fixed-  
4 price PIE Supply Agreement with Mitsubishi Power Americas. The final cost figure for  
5 McNew was consistent with the estimated costs previously provided in Evergy's  
6 November direct testimony.

7 **Q: Per Section (6)(F) of the CCN Rule, does EMW have the financial ability to acquire,**  
8 **construct, install, own, manage, maintain, and control the McNew generation facility?**

9 A: Yes. As discussed by Mr. Grace in his Direct Testimony on pages 3-6 and his Supplemental  
10 Direct Testimony, EMW has adequate liquidity to finance McNew.

11 **Q: Per Section (6)(G) of the CCN Rule, please describe the IRP process in Missouri.**

12 A: As discussed further by Mr. VandeVelde, "[t]he IRP process is completed under the  
13 Commission's Electric Utility Resource Planning Rules are found in Chapter 22 of 20 CSR  
14 4240. It results in the selection of a Preferred Plan, which reflects the combination of  
15 supply-side and demand-side resources that EMW and EMM will use to meet forecasted  
16 customer requirements for the next twenty years."<sup>6</sup>

17 **Q: Please outline the different resource planning modeling exercises that were completed**  
18 **to support testimony in this case as well as other IRP filings?**

19 A: As discussed in Mr. VandeVelde's Supplemental Direct Testimony, Evergy has completed  
20 four (4) different modeling exercises to support testimony in this CCN proceeding, as well  
21 as previous and upcoming IRP filings.

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<sup>6</sup> VandeVelde Direct at 4.

1 **Q: What resource planning modeling exercise was used to support Evergy witnesses’**  
2 **supplemental direct testimony filings?**

3 A: EMW used the “CCN Supplemental Direct” modeling analysis to support testimony in this  
4 CCN proceeding. This analysis, as described in detail by Mr. VandeVelde, was used to  
5 determine EMW’s, as well as other Evergy utilities,’ needs for physical capacity and  
6 energy and their ability to respond to projected significant development in Missouri and  
7 Kansas. EMW’s “CCN Supplemental Direct” analysis concluded that it is prudent to  
8 allocate a 50% share of McNew to EMW. EMW demonstrated that it has the earliest need  
9 for capacity and energy to satisfy its existing and new incremental large customers’ loads  
10 by 2030. The “CCN Supplemental Direct” analysis is consistent with EMW’s “2025  
11 Annual IRP Update” that is planned to be filed in March 2025.

12 **Q: Per Section (6)(H) of the CCN Rule, please provide any updates since EMW’s direct**  
13 **testimony filing regarding the competitive bidding process(s).**

14 A: As discussed further by Evergy witnesses Mr. Olson and Mr. Humphrey, Evergy has yet  
15 to select an EPC contractor for McNew, Viola, and Mullin Creek # 1 and has not signed a  
16 final EPC contract. However, Evergy has received cost estimates from potential EPC  
17 contractors and has incorporated those estimates in the Projects total cost estimates. Evergy  
18 expects to have a negotiated and signed EPC contract by the second quarter of 2025.  
19 Additionally, as discussed herein, Evergy has finalized PIE Supply Agreement with  
20 Mitsubishi Power Americas, and EMW has finalized agreements for GSUs transformers  
21 for McNew, Viola, and Mullin Creek # 1 with a well-established supplier not located in  
22 southeast Asia to minimize tariff risks and the possible purchase of parts and components  
23 from China.

1 **Q: What other standards has the Commission traditionally employed in evaluating CCN**  
2 **applications?**

3 A: When determining whether a project is necessary or convenient for the public service, the  
4 Commission has traditionally applied five criteria, commonly known as the *Tartan* factors,  
5 which are as follows:

- 6 1. Is the service needed?
- 7 2. Is the applicant's proposal economically feasible?
- 8 3. Is the applicant qualified to provide the service?
- 9 4. Does the applicant have the financial ability to provide the service?
- 10 5. Does the proposed service promote the public interest?

11 **Q: Will you address the necessary updates to the *Tartan* factors regarding Evergy's**  
12 **decision to allocate Evergy Missouri West a 50% interest in McNew?**

13 A: Yes. I address how EMW needs McNew, McNew is economically feasible, EMW has the  
14 financial ability to provide service, and McNew is in the public interest.

15 **1. EMW Needs McNew**

16 **Q: How does the Commission define necessity for purposes of CCN applications?**

17 A: Please refer to my Direct Testimony on page 16 for the discussion of how the Commission  
18 defines "necessity."

1   **Q:    How does EMW being allocated a 50% interest in McNew satisfy EMW's need, given**  
2       **the updated resource planning modeling analysis?**

3   A:    First, Company witness Humphrey describes in his Direct Testimony how these natural  
4       gas electrical production facilities are a significant part of the Company's broader long-  
5       term resource plan to meet substantially increased capacity and energy requirements while  
6       ensuring system reliability and minimizing carbon emissions from its system.

7               Second, as discussed herein and in Mr. VandeVelde's Supplemental Direct  
8       Testimony, EMW as well as its two affiliates have resource adequacy needs, sufficient  
9       future load, and additional demand to support allocation of the second half of the McNew  
10      facility. However, among the three affiliates EMW has the earliest need for McNew and  
11      the least flexibility beyond the facility to meet its increased load ramp while bridging  
12      market capacity.

13       **2. EMW's Being Allocated the McNew Plant is Economically Feasible**

14   **Q:    Do the benefits for EMW customers that result from adding McNew justify the costs?**

15   A:    Yes. In their direct testimony Company witnesses Mr. Humphrey, Mr. Olson, and Mrs.  
16       Onnen describe how McNew and the other natural gas plants provide a valuable addition  
17       to EMW's portfolio in terms of firm, dispatchable power plants. McNew will include firm  
18       fuel transport for the combined cycle plant. The plants are also located at different points  
19       on the Southwest Power Pool ("SPP") grid providing for geographic diversity while still  
20       being located in the SPP.

21               As discussed by Mr. VandeVelde, EMW needs McNew's capacity and energy to  
22       supply. Company witnesses Humphrey and Olson has described how we have run  
23       competitive bid processes in order to select the contractors to fill all of the major

1 requirements for the project – the OE, the PIE supplier, and the EPC contractor. We have  
2 also capitalized on economies of scale that result from planning and constructing three  
3 natural gas plants as part of the same process. The costs are justified because, as discussed  
4 herein and by Mr. Olson, the cost estimates of McNew were similar to those previously  
5 submitted and are within industry standard market price.

6 **3. EMW Has the Ability to Finance the Construction of McNew**

7 **Q: Does EMW have the ability to finance the purchase and operation of McNew?**

8 A: Yes. As discussed above under Section III(A) and by Mr. Grace, EMW has adequate short-  
9 term liquidity available to finance McNew along with EMW's 50% interest in Viola and  
10 100% interest in Mullen Creek #1.

11 **4. EMW's Allocation of a 50% Share in McNew Serves the Public Interest**

12 **Q: Please describe how EMW's acquisition of a 50% interest in McNew is in the public**  
13 **interest.**

14 A: As discussed further in more detail by other Company witnesses, and my Direct Testimony  
15 on pages 22 and 23, McNew is in the public interest because the facility will ensure that  
16 EMW is able to provide safe and adequate service to its customers. McNew will provide  
17 grid reliability and economic benefits are both necessary and convenient for public service  
18 and public interest. This is discussed further in detail in Mr. VandeVelde's Supplemental  
19 Direct Testimony. Additionally, adding McNew is consistent with the Commission's,  
20 Staff's, and especially OPC's position that EMW needs to invest in Company owned  
21 dispatchable generation resources instead of relying on the SPP wholesale market.



1           **IV.     SUPPLEMENTAL SUPPORT FOR EVERGY MISSOURI WEST’S 50%**  
2           **INTEREST IN VIOLA AND 100% INTEREST IN MULLIN CREEK # 1 UNDER CCN**  
3           **RULE AND THE TARTAN FACTORS**

4   **Q:     Are there sections of your testimony pertaining to Viola and Mullin Creek #1 that**  
5           **need updated in regard to the CCN Rule?**

6   A:     Yes. EMW will provide updates regarding cost estimates, financing, resource planning  
7           modeling analysis, and the RFP.

8   **Q:     Per Section (6)(C) of the CCN Rule, please provide any cost estimates that need to be**  
9           **updated for Viola and Mullin Creek #1.**

10 A:     As discussed further by Company witness Mr. Olson, and discussed herein under Section  
11         III(A), Evergy received EPC contractor bids for the Viola and Mullin Creek # 1 facilities  
12         and has established updated cost estimates. The updated cost estimate for Viola was close  
13         to the cost previously stated in Evergy’s November filings. The bids received for Mullin  
14         Creek # 1 were higher than previously estimated but are well supported by EPC bids  
15         and by the CCN Supplemental Direct modeling analysis. The updated cost estimates for  
16         Viola and Mullin Creek #1 are set forth in Mr. Olson’s Supplemental Direct  
17         Testimony. Additionally, as discussed further by Mr. Olson and herein under Section  
18         III(A), EMW has finalized a PIE Supply Agreement with Mitsubishi Power Americas.  
19         The final cost figure for Viola was consistent with the estimated costs previously provided  
20         in EMW’s November direct testimony. The estimated cost for Mullin Creek # 1’s PIE  
21         equipment increased from the previous estimate; however, the figure was within the  
22         range of estimated prices in the bid proposals.

1 **Q: Per Section (6)(F) of the CCN Rule, does EMW have the financial ability to acquire,**  
2 **construct, install, own, manage, maintain, and control Viola and Mullin Creek #1?**

3 A: Yes. EMW's plan to finance Viola and Mullin Creek # 1 remain the same as discussed in  
4 Mr. Grace's Direct Testimony.

5 **Q: Is EMW's acquisition of a 50% interest of Viola and 100% interest in Mullin Creek**  
6 **# 1 consistent with EMW's most recent updated resource planning modeling work?**

7 A: Yes. These generation additions are consistent with EMW's "CCN Supplemental Direct"  
8 updated resource planning modeling and analysis, as discussed herein as well as Mr.  
9 VandeVelde's Supplemental Direct Testimony. Additionally, as stated by Mr.  
10 VandeVelde, acquisition of 50% of the Viola CCGT facility corresponds with the  
11 additional 355 MW of additional thermal generation called for in 2029 by the preferred  
12 portfolio. In addition, the 440 MW Mullin Creek # 1 SCGT facility corresponds with the  
13 425MW called for in 2030.

14 **Q: Given EMW's "CCN Supplemental Direct" updated resource planning modeling, as**  
15 **stated above, does Viola and Mullin Creek #1 satisfy EMW's need per the *Tartan***  
16 **factors?**

17 A: Yes. As discussed herein and further by Mr. VandeVelde and Mr. Humphrey, EMW's  
18 50% interest in Viola and 100% in Mullin Creek # 1 is consistent with the need identified  
19 with EMW's "CCN Supplemental Direct" updated resource planning modeling and  
20 analysis.

1       **V.     MISCELLANEOUS LEGAL AND FACTUAL UPDATES/REQUESTS**

2       **Q:     Please provide any additional updates pursuant to the Company’s request for**  
3       **Allowance for Funds Used During Accounting (“AFUDC”) for McNew, Viola, and**  
4       **Mullin Creek #1.**

5       A:     The accounting methodologies proposed in the Direct Testimony of Ron Klote related to  
6       accounting for the jointly owned assets, the use of Joint Ownership and Joint Operating  
7       Agreements and general accounting for costs related to and incurred in construction of  
8       jointly owned assets have not changed.

9       **Q:     Is EMW still requesting that the Commission issue a determination of decisional**  
10       **prudence for the facilities?**

11      A:     Yes. As discussed in my Direct Testimony, the “Application, supporting exhibits,  
12      testimony, and schedules contain every piece of evidence needed to evaluate and make a  
13      determination whether it is prudent for the Company to build and acquire these gas  
14      facilities for the benefit of EMW customers.”<sup>7</sup> In addition to the evidence provided in  
15      Evergy’s direct testimonies, EMW is supplying updated cost estimates, updated resource  
16      planning modeling and analysis, and other significantly important information in its  
17      supplemental direct testimonies. The Commission has all the necessary information to  
18      issue an order of decisional prudence pertaining to these facilities.

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<sup>7</sup> Kevin Gunn Direct at 24.

1   **Q:    What does EMW recommend to the Commission regarding the potential impacts of**  
2       **President Trump’s tariff proclamations?**

3   A:    As discussed by Mr. Jason Humphrey, EMW requests that it be permitted leave, at such  
4       time, by the Commission to submit adjusted cost estimates to account for any known and  
5       quantifiable tariff-related impacts or other governmental or economic impacts.

6   **Q:    Does this conclude your testimony?**

7   A:    Yes.

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

In the Matter of the Application of Evergy )  
Missouri West, Inc. d/b/a Evergy Missouri )  
West and Evergy Metro, Inc. d/b/a Evergy )  
Missouri Metro for Permission and Approval )  
of a Certificate of Public Convenience and )  
Necessity For Natural Gas Electrical )  
Production Facilities )

Case No. EA-2025-0075

**AFFIDAVIT OF KEVIN D. GUNN**

**STATE OF MISSOURI** )  
 ) ss  
**COUNTY OF JACKSON** )

Kevin D. Gunn, being first duly sworn on his oath, states:

1. My name is Kevin D. Gunn and I am employed by Evergy Metro, Inc. as Vice President – State and Federal Regulatory Policy.

2. Attached hereto and made a part hereof for all purposes is my Supplemental Direct Testimony on behalf of Evergy Missouri Metro and Evergy Missouri West consisting of seventeen (17) 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.

  
\_\_\_\_\_  
Kevin D. Gunn

Subscribed and sworn before me this 19<sup>th</sup> day of February 2025.

  
\_\_\_\_\_  
Notary Public

My commission expires: 4/26/2025

