

**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)

File No. EA-2025-0075

COMES NOW, Renew Missouri Advocates d/b/a Renew Missouri, pursuant to 20 CSR 4240-2.115(2)(B), and objects to the *Non-Unanimous Stipulation and Agreement* filed on May 29, 2025. Renew Missouri objects for the foregoing reasons:

1. On May 29, 2025, counsel for Evergy Missouri West, Inc. d/b/a Evergy Missouri West (EMW or the “Company” or “Evergy”), Staff for the Missouri Public Service Commission (“Staff”), and Midwest Energy Consumers Group filed a Non-Unanimous Stipulation and Agreement (the “Stipulation”).
2. On the same day, Renew Missouri, along with Sierra Club, indicated that they would oppose the Stipulation in a *Revised List of Issues* filed by the parties in the docket. Parties additionally agreed that the case could be briefed on its merits, and that a formal hearing was not necessary.
3. Paragraphs 1 through 5 of the Stipulation allow for Evergy to build all three natural gas facilities, at full capacity, and to recover the confidential construction cost estimates.
4. Renew Missouri provided evidence that Evergy has not satisfied two of the Tartan factors, focusing on the economic feasibility, and public interest standards. First, Renew Missouri presented evidence that historical fuel purchasing history, outdated integrated resource planning modeling (or none for McNew), and increased pressures on the already volatile natural gas prices

will result in much higher prices for customers. Therefore, Renew Missouri asserts EMW has not demonstrated the Projects are economically feasible. Additionally, failure to evaluate potential alternative ownership arrangements or generating resources reduced Evergy's options in presenting a well-rounded, risk mitigated, least-cost suite of generation resources to meet its energy and capacity requirements. Evergy also has not presented a sound gas procurement plan to ensure the Projects are economically feasible throughout the lifespans.

Finally, Renew Missouri asserts the Projects are not in public interest as the unnecessary risks of fuel price volatility and overall economic uncertainty do not benefit the customers' interest. Furthermore, the public interest attributes of alternative resources such as batteries can provide dispatchable, clean energy, and more effectively work as a hedge in an overcrowded natural gas generating energy market.

5. Renew Missouri posits that Evergy has not met its burden to show that building the proposed gas generators has meet all the Tartan factors. In fact, no non-utility party could state that the Projects were economically feasible. Renew Missouri's witness Mr. Jones demonstrates that Evergy's case for approval of these generators is flawed, and that real cost to customers could be several magnitudes more expensive, just in yearly, ongoing fuel procurement costs. Renew Missouri suggested alternative ownership models, replacing natural gas capacity for battery capacity, and re-evaluation of a portion of the Projects or capacity in testimony as viable alternatives.

6. Accordingly, Renew Missouri objects to Paragraphs 1 through 5 of the Stipulation because they suggest it would be prudent, necessary, convenient, or otherwise in the public interest to approve these Projects. Renew Missouri also objects to the Stipulation as it suggests the Tartan factors have been meet. Renew Missouri also objects to EMW's request for decisional prudence

but understands the Stipulation to mean that all parties will be briefing decisional prudence for the Commission to determine in this case.

WHEREFORE, for the following reasons stated above, and will be expounded upon in its post hearing briefing, Renew Missouri respectfully objects to the *Non-Unanimous Stipulation and Agreement*, and requests the Commission reject the *Non-Unanimous Stipulation and Agreement*, and instead rejected the CCN request and order EMW to evaluate the alternative proposals outlined in Renew Missouri's testimony.

Respectfully Submitted,

/s/ Nicole Mers

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GENERAL COUNSEL FOR RENEW
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Certificate of Service

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 5th day of June 2025.

/s/ Nicole Mers