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Witness: Jessica Polk Sentell

Sponsoring Party: Renew Missouri  
Advocates

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Case No.: EO-2025-0154

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**MISSOURI PUBLIC SERVICE COMMISSION**

**EO-2025-0154**

**REBUTTAL TESTIMONY**

**OF**

**JESSICA POLK SENTELL**

**ON BEHALF OF**

**RENEW MISSOURI ADVOCATES**

July 25, 2025

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2

## I. INTRODUCTION

3 **Q: Please state your name, title, and business address.**

4 A: Jessica Polk Sentell, Director of Eastern Missouri and Policy Associate, Renew  
5 Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), 501 Fay Street, Suite 206,  
6 Columbia, MO 65201.

7 **Q: Please describe your current position, your education, and background.**

8 A: In my role as Director of Eastern Missouri and Policy Associate at Renew Missouri,  
9 I, along with other Renew Missouri staff, have developed and offered educational materials  
10 and programs on topics related to energy law and policy in Missouri, rural renewable siting  
11 and county planning and zoning, rural broadband, local organizing and rural electric  
12 cooperative engagement, and our year-end update covering state and federal rulemakings,  
13 Public Service Commission (“PSC” or the “Commission”) cases, and other various energy  
14 efficiency/renewable energy updates.

15 Regarding my background and education, I have a Masters of Public Administration and a  
16 Bachelor of Science in Political Science, both from Missouri State University in  
17 Springfield, Missouri. Upon graduating with my master’s degree, I was selected as a  
18 Presidential Management Fellow by the Office of the President of the United States,  
19 Washington, D.C. As a Presidential Management Fellow, I spent over three years working  
20 as a Program Analyst for the federal government. During my tenure, I worked for the US  
21 Department of Defense, Joint Chiefs of Staff, National Military Command Center,  
22 Pakistan-Afghanistan Coordination Cell, Office of Governance & Development; US  
23 Department of State, Office of the Special Representative to Muslim Communities; and

1 US Department of Justice, Drug Enforcement Administration, International Operations,  
2 Special Projects Branch.

3 I am also a certified teacher in the State of Missouri and have a certificate in Culturally  
4 Responsive Teaching From Southeast Missouri State University's Center for Teaching and  
5 Learning. Prior to beginning my position at Renew Missouri, I spent six years teaching  
6 political science as a full-time instructor at Southeast Missouri State University in Cape  
7 Girardeau, Missouri, six years as a part-time adjunct instructor at Three Rivers College in  
8 Poplar Bluff, Missouri, and six years as a full-time high school and dual credit teacher at  
9 Clearwater R-1 High School in Piedmont, Missouri.

10 **Q: What work does Renew Missouri conduct in the field of energy policy?**

11 A: Renew Missouri is an advocacy group appearing before regulatory agencies such  
12 as the Missouri Public Service Commission, the Kentucky Public Service Commission,  
13 and the Kansas Corporation Commission in the role as expert witnesses on clean energy,  
14 energy efficiency, and transmission development policy. Our work involves engaging as  
15 intervenors on utility rate cases, applications for certificates of convenience and necessity  
16 ("CCNs"), mergers and acquisitions, Accounting Authority Orders ("AAOs"), and energy  
17 efficiency investment portfolios. Renew Missouri also routinely engages in workshops and  
18 rulemaking by providing comments. We have also lent our expertise and knowledge on  
19 legislative matters in Missouri and Kansas as well as the federal level on issues ranging  
20 from energy efficiency investments to securitization of debts incurred from closing coal  
21 plants to helping rural electric cooperatives obtain financing for clean energy projects.

22 **Q: Have you testified before any state utility commissions?**

1 A: I have aided with research and development of pre-filed testimony in Ameren  
2 Missouri's recent rate case, File No. ER-2024-0319, In the Matter of Union Electric  
3 Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service, and  
4 Evergy Missouri Metro and Evergy Missouri West's ("Evergy" or the "Company") recent  
5 CCN for solar generation facilities in File No. EA-2024-0292, In the Matter of the  
6 Application of Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Permission and  
7 Approval of Certificates of Public Convenience and Necessity Authorizing It to Construct,  
8 Install, Own, Operate, Manage, Maintain and Control Two Solar Generation Facilities.

9 **Q: What is the purpose of your testimony?**

10 A: The purpose of my testimony is to support many of the riders involved in this  
11 docket. I will make the argument that the Commission should approve those riders for the  
12 Company to offer to all of its large load customers.

13 **Q: Could you please briefly summarize your testimony as well as your**  
14 **recommendations?**

15 A: I begin by summarizing each of the five tariff riders to the Large Load Power  
16 Service ("LLPS") we are specifically supporting and then outline the benefits of allowing  
17 all LLPS customers to participate in said tariff riders. In general, Renew Missouri is  
18 supportive of customers having clean energy choices that make economic sense for both  
19 customers and the Company, as well as the opportunity to participate in energy efficiency  
20 programs. Renew Missouri believes these voluntary renewable rider programs help bring  
21 important health and economic benefits to all Missourians, at a reduced cost due to  
22 allocation to the LLPS class, as discussed below. For the reason outlined in greater detail

1 below, Renew Missouri recommends the Commission approve the tariff riders as a  
2 compliment to any large load rate class.

## 3 II. SUPPORT OF RIDERS

4 **Q: Why does Evergy need new tariff riders for large load customers?**

5 A: As Mr. Kevin Gunn testified, Evergy is working with over twenty large-load  
6 customers, including Google, to bring more than six gigawatts of demand to Missouri.<sup>1</sup>  
7 Clearly, there is substantial demand from large-load customers, and Evergy needs  
8 modernized programs to address modern consumer needs and be marketable or appealing  
9 to companies locating in Evergy's service territory. Evergy's current Renewable Energy  
10 Rider ("RER") program is already fully-subscribed and doesn't address current large-load  
11 customer needs, while experts across the energy sector are forecasting a continued increase  
12 in demand.<sup>2</sup> In short, the need to offer more renewable energy rider options is urgent and  
13 growing.

14 **Q: Provide a brief description of the Customer Capacity Rider (Schedule CCR).**

15 A: This is an optional rate for LLPS customers who own generation resources.  
16 Contracts are negotiated subject to Evergy's capacity needs and discretion, with a  
17 minimum contracted capacity of 10,000 kW per year. Customers will receive credit based  
18 on the difference between the LLPS demand charge and the negotiated capacity price.

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<sup>1</sup> *Direct Testimony of Kevin Gunn*, p. 12-13.

<sup>2</sup> *In the Matter of the Application of Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Permission and Approval of Certificates of Public Convenience and Necessity Authorizing It to Construct, Install, Own, Operate, Manage, Maintain and Control Two Solar Generation Facilities*, File No. EA-2024-0292, *Direct Testimony of Kimberly H. Winslow*, p. 6 & 13.

<https://www.iea.org/news/growth-in-global-electricity-demand-is-set-to-accelerate-in-the-coming-years-as-power-hungry-sectors-expand>

<https://www.eia.gov/todayinenergy/detail.php?id=65264>

<https://www.energy.gov/articles/doe-releases-new-report-evaluating-increase-electricity-demand-data-centers>

1 Accredited capacity will reduce billed demand used for the Standby Service Rider (“SSR”)  
2 charge.

3 **Q: Why is Renew Missouri supportive of this rider?**

4 A: Renew Missouri has consistently been supportive of net metering/parallel  
5 generation. This not only reduces demand stress on Evergy’s system by supplying  
6 additional power, but it also allows for an efficient use of low-cost power. In many  
7 instances, the local generation is also a renewable form of generation, which we are  
8 generally in support of due to its low price, predictable generation patterns, and being a  
9 locally produced source of power.

10 **Q: Provide a brief overview of the Demand Response and Local Generation Rider**  
11 **(Schedule DRLR).**

12 A: This is an optional rider for LLPS customers with flexible loads and/or on-site  
13 generation that provides financial incentives to customers for flexible operations and local  
14 generation usage. Evergy may call demand response “events” in order to improve system  
15 reliability, address resource adequacy, offset system peaks, or lower market costs. LLPS  
16 customers can then curtail load or use on-site generation.

17 **Q: Why is Renew Missouri supportive of this rider?**

18 A: Renew Missouri has consistently been supportive of demand response and other energy  
19 choices for both residential and commercial tariffs for all Missouri investor-owned  
20 utilities.<sup>3</sup> This not only reduces stress on the overall grid and helps keep costs lower for *all*  
21 customers, but it also encourages energy efficiency and a conscious use of resources. This  
22 program will “induce reductions in consumption, either through demand shifting or

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<sup>3</sup> See e.g., In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service, File No. ER-2024-0319, *Direct Testimony of James Owen*, p. 6, l. 1 – p. 12, l. 2.

conservation during hours with the highest” demand.<sup>4</sup> In many instances, local generation is also a renewable form of generation (solar, solar with battery storage, etc.), which we are, again, generally in support of.<sup>5</sup>

**Q: Provide a brief overview of the Clean Energy Choice Rider (“CER”).**

A: This rider is for LLPS customers with corporate sustainability or decarbonization goals. The customer can request specific clean energy modifications, such as replacing natural gas with renewables or battery storage. The customer funds the incremental costs and acceleration costs over the resource’s life until the cost differential is fully paid.

**Q: Why is Renew Missouri supportive of this rider?**

A: Not only will CER help customers reach their own sustainability goals, it will also help Evergy reach its sustainability goal of attaining net-zero carbon emissions by 2045, aid in the retirement of Evergy’s coal plants, and help cover the costs of adding said sustainable generation to Evergy’s grid.<sup>6</sup> In Evergy’s own words, their sustainability goals “promote positive financial and environmental performance.”<sup>7</sup> Increased clean energy choices will reduce greenhouse gas emissions and thus improve conditions for better health of Missourians as well.<sup>8</sup>

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<sup>4</sup> National Bureau of Economic Research. “Electricity Retail Rate Design in a Decarbonized Economy: An Analysis of Time-Of-Use and Critical Peak Pricing.” (October 2022). Accessed at: <https://www.nber.org/papers/w30560>

<sup>5</sup> See e.g., In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service, File No. ER-2024-0319, *Direct Testimony of James Owen*, p. 14, l. 1 – p. 34, l. 2. In the Matter of the Application of Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Permission and Approval of Certificates of Public Convenience and Necessity Authorizing It to Construct, Install, Own, Operate, Manage, Maintain and Control Two Solar Generation Facilities, File No. EA-2024-0292, *Rebuttal Testimony of James Owen*.

<sup>6</sup> <https://investors.evergy.com/sustainability>  
[https://filecache.mediaroom.com/mr5mr\\_evergy/179576/Sustainability%20Report%202024.pdf](https://filecache.mediaroom.com/mr5mr_evergy/179576/Sustainability%20Report%202024.pdf), p. 9.

<sup>7</sup> *Id.*

<sup>8</sup> <https://climate.nasa.gov/news/3134/reducing-emissions-to-lesser-climate-change-would-yield-dramatic-health-benefits-by-2030/>  
<https://www.epa.gov/climateimpacts/climate-change-impacts-health>  
<https://pmc.ncbi.nlm.nih.gov/articles/PMC4953604/>

1       **Q:     Provide a brief overview of the Renewable Energy Program Rider (RENEW).**

2       A:     LLPS customers can purchase unbundled Renewable Energy Certificates (“RECs”)  
3       up to 100% of their annual energy usage in increments of 10%. Customers will pay a fixed  
4       price for RECs, adjusted annually, which will be retired annually on behalf of the customer.

5       **Q:     Why is Renew Missouri supportive of this rider?**

6       A:     Each REC purchased will account for the production of 1 MWh of zero-emissions  
7       energy.<sup>9</sup> Not only will RENEW help customers reach their own sustainability goals, this  
8       program will also generate revenue for all Evergy customers. Furthermore, there are  
9       Evergy customers who already purchase or wish to purchase RECs, so there is already  
10      established demand for such a program.<sup>10</sup>

11      **Q:     Provide a brief overview of the Green Solutions Connection Rider (“GSR”).**

12      A:     This voluntary program offers renewable energy subscriptions for new Company-  
13      owned integrated resource plan (“IRP”)-approved wind or solar generation and is available  
14      to non-residential customers with an average monthly peak demand greater than 200kW.  
15      Customers can subscribe to renewable energy attributes for 10- or 15-year terms, based on  
16      a fixed annual price per kWh with premiums for asset-backed, market risk, and  
17      administration costs.

18      **Q:     Why is Renew Missouri supportive of this rider?**

19      A:     Not only will GSR help customers reach their own sustainability goals, it will also  
20      help Evergy reach their stated sustainability goals of Scope 1 and 2 net-zero carbon

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<sup>9</sup> [https://www.epa.gov/sites/default/files/2018-03/documents/gpp\\_guide\\_recs\\_offsets.pdf](https://www.epa.gov/sites/default/files/2018-03/documents/gpp_guide_recs_offsets.pdf), p. 4.

<sup>10</sup> <https://corporate.aldi.us/corporate-sustainability/climate-and-energy/renewable-energy>  
<https://www.bv.com/resources/black-veatch-2020-2023-sustainability-strategy>, p. 15



emissions by 2045.<sup>11</sup> Furthermore, generation resources utilized for this rider program have already or will go through the IRP process, contributing to the Company's long-term resource planning process.

As Renew Missouri previously testified, benefits of C&I customers participating in the GSR include: mitigating future bills, supporting additional renewable energy resources, making a positive environmental impact, and taking a leadership position in supporting solar growth and green energy.<sup>12</sup>

**Q: In multiple instances, you referenced LLPS customers meeting sustainability goals. Can you give examples of these goals?**

A: C&I customers, like Google, Amazon, and Meta, want “renewable-backed power.”<sup>13</sup> “They have decarbonization mandates embedded in their business models and investor commitments.”<sup>14</sup> Walmart has a goal to use 100% renewable energy by 2035; as of July 2025, they are only using 36% renewable energy.<sup>15</sup> Scheiber Foods has “committed to reducing absolute Scope 1 and 2 GHG emissions 27% by 2030” and “also pledged to reduce Scope 3 Purchased Goods and Services GHG emissions 30% per metric ton of production by 2030....with a net zero objective for 2050.”<sup>16</sup> Hallmark is “committed to

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<sup>11</sup> <https://investors.evergy.com/sustainability>  
[https://filecache.mediaroom.com/mr5mr\\_evergy/179576/Sustainability%20Report%202024.pdf](https://filecache.mediaroom.com/mr5mr_evergy/179576/Sustainability%20Report%202024.pdf), p. 8

<sup>12</sup> *In the Matter of the Application of Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Permission and Approval of Certificates of Public Convenience and Necessity Authorizing It to Construct, Install, Own, Operate, Manage, Maintain and Control Two Solar Generation Facilities*, File No. EA-2024-0292, Rebuttal Testimony of James Owen, p. 5.

<sup>13</sup> [https://www.utilitydive.com/news/ira-energy-storage-flexibility-arevon/751991/?utm\\_source=Sailthru&utm\\_medium=email&utm\\_campaign=Issue:%202025-07-01%20Utility%20Dive%20Newsletter%20%5Bissue:74555%5D&utm\\_term=Utility%20Dive](https://www.utilitydive.com/news/ira-energy-storage-flexibility-arevon/751991/?utm_source=Sailthru&utm_medium=email&utm_campaign=Issue:%202025-07-01%20Utility%20Dive%20Newsletter%20%5Bissue:74555%5D&utm_term=Utility%20Dive)

<sup>14</sup> *Id.*

<sup>15</sup> [https://corporate.walmart.com/content/corporate/en\\_us/purpose/sustainability.html/](https://corporate.walmart.com/content/corporate/en_us/purpose/sustainability.html/)

<sup>16</sup> <https://www.schreiberfoods.com/responsibility/environment/>

1 transitioning to 100% renewable electricity across [their] global operations” and already  
2 participates in Evergy’s Renewables Direct program.<sup>17</sup>

3 A&M Products, a subsidiary of The Clorox Company, continues “to deliver on [their] 2030  
4 science-based target for scopes 1 and 2 greenhouse gas emission reductions with 100%  
5 renewable electricity” via “virtual power purchase agreements.”<sup>18</sup> American International  
6 Reality Corporation (“AIG”), is “committed to 100 percent Renewable Energy for AIG’s  
7 operations by 2030, or sooner.”<sup>19</sup> Aldi is “procuring 100% renewable electricity through  
8 renewable energy credits,” as well as installing solar panels on stores and distribution  
9 centers.<sup>20</sup> By 2023, Black and Veatch had “exceeded [their] goal to achieve a 40 percent  
10 decline in Scope 1 and 2 emissions and a 20 percent decline in overall GHG emissions  
11 (Scope 1, 2, and Scope 3, business travel), from a 2019 baseline through absolute  
12 reductions, renewable energy use, and Renewable Energy Certificates and are “committed  
13 to achieving net zero greenhouse gas emissions across Scope 1, 2, and 3 by 2050.”<sup>21</sup>  
14 Finally, Boehringer Ingelheim, an animal vaccine manufacturer in St. Joseph, and Nucor,  
15 the first micro-mill in the country to be run by wind located in Sedalia, are both now fully  
16 powered by wind energy. These examples prove this is a viable interest of Evergy service  
17 territory located companies.<sup>22</sup>

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<sup>17</sup> <https://corporate.hallmark.com/citizenship/ourplanet-2021-2/>

<sup>18</sup> [https://s204.q4cdn.com/178752512/files/doc\\_financials/2024/ar/Clorox-FY24-Integrated-Annual-Report.pdf](https://s204.q4cdn.com/178752512/files/doc_financials/2024/ar/Clorox-FY24-Integrated-Annual-Report.pdf), p.6.

<sup>19</sup> <https://www.aig.com/content/dam/aig/america-canada/us/documents/about-us/report/sustainability-net-zero-fact-sheet.pdf>

<sup>20</sup> <https://corporate.aldi.us/corporate-sustainability/climate-and-energy/renewable-energy>

<sup>21</sup> <https://www.bv.com/resources/black-veatch-2020-2023-sustainability-strategy>, p. 15.

<sup>22</sup> <https://bi-animalhealth.com/we-care/sustainability-and-social-impact>

The Missouri Times. (2019, December 18). PSC approves order related to Evergy, Nucor steel mill.  
<https://themissouritimes.com/psc-approves-order-related-to-evergy-nucor-steel-mill/>

1 While these businesses have emissions goals, Amazon saw a six percent *increase* in  
2 emissions in 2024, attributed to data centers.<sup>23</sup> Thus, C&I customers may have an *even*  
3 *greater need* for increased **clean** energy options than previously thought.

4 As Mr. Gunn testified, "Many large load customers have corporate decarbonization goals  
5 ranging from percentage-based emission reduction or clean energy targets, zero or even  
6 negative carbon emission goals, and 24/7 renewable energy goals."<sup>24</sup> Additionally, "75  
7 percent of the respondents to the Area Development Magazine's Corporate Survey in the  
8 first quarter of 2022 indicate that 'access to renewable sources of energy are very or  
9 somewhat important to their companies. And more than 90 percent of the survey  
10 respondents also say sustainability efforts are very or somewhat important to their  
11 companies.'"<sup>25</sup> Mr. Gunn added that, "Customers are increasingly *requesting* 'additionality'  
12 in resource development, meaning customers are seeking to be served with new, low-cost  
13 renewable energy that may not have otherwise been built" (emphasis added).<sup>26</sup>

14 **Q: Do other investor-owned utility companies in Missouri offer comparable riders or**  
15 **similar programs to large-load customers?**

16 A: Yes, while not identical, Ameren Missouri, offers a Renewable Solutions Program ("RSP")  
17 for C&I customers similar to Evergy's GSR. They also utilize RECs in their RSP and  
18 separately offer various demand response programs and TOU rates.<sup>27</sup>

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<sup>23</sup> [https://www.bloomberg.com/news/articles/2025-07-16/amazon-s-emissions-climbed-6-in-2024-on-data-center-buildout?cmpid=BBD071725\\_GREENDAILY&utm\\_medium=email&utm\\_source=newsletter&utm\\_term=250717&utm\\_campaign=greendaily&embedded-checkout=true](https://www.bloomberg.com/news/articles/2025-07-16/amazon-s-emissions-climbed-6-in-2024-on-data-center-buildout?cmpid=BBD071725_GREENDAILY&utm_medium=email&utm_source=newsletter&utm_term=250717&utm_campaign=greendaily&embedded-checkout=true)

<sup>24</sup> Direct Testimony of Kevin Gunn, p. 14.

<sup>25</sup> Direct Testimony of Kevin Gunn, p. 5.

<sup>26</sup> Direct Testimony of Kevin Gunn, p. 6.

<sup>27</sup> <https://www.ameren.com/missouri/business/demand-response>  
<https://www.ameren.com/missouri/business/rates>  
<https://www.ameren.com/missouri/company/rate-options>

1 **Q: Are Ameren Missouri’s comparable programs fully subscribed or considered**  
2 **successful?**

3 A: Yes, Ameren Missouri’s RSP is fully subscribed, and confidential information and reports  
4 provided by Ameren Missouri support expectations of a continuing successful program.  
5 Separate studies have concluded that demand response and TOU rates are effective in  
6 incentivizing efficiency and lead to demand savings.<sup>28</sup>

7 **Q: While understanding Ameren Missouri’s and Evergy’s programs and rates are not**  
8 **identical, is it reasonable to assume there would be similar demand for similar**  
9 **programs and rates from Evergy’s C&I customers?**

10 A: Yes, this is a reasonable assumption.

11 **Q: Are there regional economic benefits to offering these riders?**

12 A: Yes. Access to renewable energy generation options is increasingly vital to a region’s  
13 competitive economic development. Offering customers options to purchase renewable  
14 energy is one way for Evergy to draw corporate customers to the region, as well as prevent  
15 large load customers from leaving or seeking to expand outside Evergy’s service territory.  
16 As previously referenced, Mr. Gunn testified to the survey data detailing the high level of  
17 importance corporate customers put on access to renewable resources and their  
18 sustainability goals.<sup>29</sup> Other investor-owned utilities have argued, “Real business  
19 investment decisions are being made based on renewable energy access, and states that can

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<sup>28</sup> National Bureau of Economic Research. “Electricity Retail Rate Design in a Decarbonized Economy: An Analysis of Time-Of-Use and Critical Peak Pricing.” (October 2022). Accessed at: <https://www.nber.org/papers/w30560>

<sup>29</sup> Direct Testimony of Kevin Gunn, p. 5

1 provide access to renewables are succeeding in some of the largest economic development  
2 opportunities in the country.”<sup>30</sup>

3 **Q: Can you give examples of such investment or development?**

4 A: Yes. Not only are renewable developments bringing in corporate customers or enabling  
5 them to expand inside Evergy’s service territory, but those developments are also positively  
6 contributing to both the regional and state-wide economy. Clean energy investments  
7 generate approximately three times more jobs than equivalent investments in fossil fuels.<sup>31</sup>  
8 Nearly \$8 billion was invested in solar, wind, and battery storage in 2024.<sup>32</sup> “Jobs in  
9 sustainable energy grew 4.2 percent in 2023, more than twice the rate of the overall  
10 economy. More than 3 million Americans are part of today’s sustainable energy  
11 workforce....By deploying these homegrown sustainable energy solutions, the United  
12 States is building a competitive and secure national economy. Sustainable energy  
13 investments are bringing manufacturing – and jobs – back to America.”<sup>33</sup>  
14 Communities have already begun to reap the benefits of renewable energy investments  
15 with roughly 20,000 manufacturing jobs generated since 2022 and an additional 80,000  
16 manufacturing jobs projected to be available, generating an estimated \$2 billion in worker  
17 income and nearly \$5 billion in tax revenue.<sup>34</sup>

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<sup>30</sup> *In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for a Certificate of Convenience and Necessity for a Solar Facility, Approval of a Subscription-Based Renewable Energy Program, and Authorization to Establish Tracking Mechanism*, File No. EA-2022-0245, Report and Order, p. 16; Ex. 6, Surrebuttal Testimony of Robert B. Dixon Surrebuttal Testimony, pp. 12-13; p. 14.

<sup>31</sup> Center for American Progress. (2009, June). The Economic Benefits of Investing in Clean Energy. Center for American Progress. Retrieved January 29, 2025, from [https://cdn.americanprogress.org/wp-content/uploads/issues/2009/06/pdf/peri\\_report\\_execsumm.pdf](https://cdn.americanprogress.org/wp-content/uploads/issues/2009/06/pdf/peri_report_execsumm.pdf)

<sup>32</sup> The Business Council for Sustainable Energy. (2025, February). Sustainable Energy in America 2025 Factbook. 2025 Key Trends. Retrieved February 20, 2025, from <https://bcse.org/market-trends/2025-key-trends/>

<sup>33</sup> *Id.*

<sup>34</sup> American Clean Power. (2024, July 1). Clean Energy Investing in America. Clean Energy Investing in America.

1 Nucor, for example, built a \$250 million steel plant in Evergy's territory in Sedalia.<sup>35</sup> The  
2 micro-mill is the first in the country to run on wind energy.<sup>36</sup> The Nucor steel plant brought  
3 in 500 construction jobs as well as 250 permanent positions, with entry-level positions  
4 starting around \$65,000 annually (nearly double the area's average starting wages of  
5 \$35,000).<sup>37</sup> Furthermore, Nucor was the first in the recent regulatory shift in establishing  
6 large load classes and rates outside of special contracts.

7 In 2022, Meta announced that they will be building an \$800 million data center in Kansas  
8 City, MO, providing up to 100 jobs.<sup>38</sup> This nearly 1 million-square-foot facility will be  
9 powered entirely by renewable energy, making it one of the most sustainable data centers  
10 in the world. In March 2024, Google announced a \$1 billion investment in a new data  
11 center in Kansas City. The company is working with Evergy, Ranger Power, and D. E.  
12 Shaw Renewable Investments to run the data center entirely on clean energy using a 5,000  
13 acre solar farm in Henry County.<sup>39</sup> The solar farm and data center will generate  
14 approximately 1,000 new construction jobs, 1,400 permanent jobs, and over \$1 million  
15 annually in tax revenue for Henry County, which will be distributed to taxing entities in  
16 the area, such as the county government and the school district.<sup>40</sup>

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Retrieved August, 2024, from [https://cleanpower.org/wp-content/uploads/gateway/2024/08/ACP\\_Investing-in-America-24-v2\\_Report.pdf](https://cleanpower.org/wp-content/uploads/gateway/2024/08/ACP_Investing-in-America-24-v2_Report.pdf)<https://www.gardnercapital.com/news/gardner-capital-mc-power-companies-dedicate-macon-missouri-solar-farm-july-1/>  
<https://cleanpower.org/facts/state-fact-sheets/>

<sup>35</sup> The Missouri Times. (2019, December 18). PSC approves order related to Evergy, Nucor steel mill.  
<https://themiouritimes.com/psc-approves-order-related-to-evergy-nucor-steel-mill/>

<sup>36</sup> CNBC. (2018, December 17). Powering the future: First US steel plants powered by wind, solar energy are coming for industry with big carbon footprint. <https://www.cnbc.com/2019/12/07/first-us-steel-plants-powered-by-wind-solar-energy-are-coming.html#:~:text=The%20Nucor%20plant%20was%20not,were%20finalists%20for%20the%20project>

<sup>37</sup> *Id.*

<sup>38</sup> The Fast Mode. (2022, March 28). Meta plans \$800 million data center in Missouri.  
<https://www.thefastmode.com/investments-and-expansions/23897-meta-plans-800m-data-center-in-missouri>

<sup>39</sup> KC News. (2024, March 20). Google announces \$1 billion data center in Kansas City.  
<https://thinkkc.com/news/blog/thinkkc-blog/2024/03/20/google-announces-data-center-investment-in-kansas-city>

<sup>40</sup> Shorman, J., Cronkleton, R., & The Kansas City Star. (2024, March 21). Google Announces \$1B Data Center in

Missouri, as a centrally-located state, provides an ideal location to connect coastal data centers and has less risk of being subjected to damage from natural disasters.<sup>41</sup> Allowing Evergy to offer various optional riders to LLPS customers will continue to create similar economic opportunities in Missouri in the future.

**Q: Multiple times, Renew Missouri has asserted it is supportive of adding clean generation resources. Why is that?**

A: Clean generation and storage options, such as wind and solar and optional battery storage, will reduce carbon emissions, improve conditions for better health, allow for local resource generation, contribute to keeping energy prices low, improve energy security, and create a more reliable grid.

Clean energy now outcompetes fossil fuels (“81% of renewable capacity additions in 2023 produce[d] cheaper electricity than fossil fuel alternatives”) and analysts project wind and solar costs will continue falling further below coal and natural gas costs.<sup>42</sup>

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<sup>41</sup>The Fast Mode. (2022, March 28). Meta plans \$800 million data center in Missouri.

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<sup>42</sup> Canary Media & Bond, K. (2023, September 1). Chart: Renewables are on track to keep getting cheaper and cheaper. Canary Media. Retrieved January 29, 2025, from <https://www.canarymedia.com/articles/clean-energy/charts-renewables-are-on-track-to-keep-getting-cheaper-and-cheaper>

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Davidson, K. (2025, February 4). Amid legal challenges, federal funding freeze hangs heavy over Michigan climate and energy efforts. Michigan Advance. Retrieved February 5, 2025, from [https://michiganadvance.com/2025/02/04/amid-legal-challenges-federal-funding-freeze-hangs-heavy-over-michigan-climate-and-energy-efforts/?utm\\_campaign=Newsletter&utm\\_medium=email&\\_hsenc=p2ANqtz-MQhDzWPhW3a\\_pHoP9e6G2j1cUGNFer1m\\_dCGTCioJSrBA\\_LnXLvTEd5RHE1KT](https://michiganadvance.com/2025/02/04/amid-legal-challenges-federal-funding-freeze-hangs-heavy-over-michigan-climate-and-energy-efforts/?utm_campaign=Newsletter&utm_medium=email&_hsenc=p2ANqtz-MQhDzWPhW3a_pHoP9e6G2j1cUGNFer1m_dCGTCioJSrBA_LnXLvTEd5RHE1KT)

IRENA. (2024). Renewable Power Generation Costs In 2023. International Renewable Energy Agency. Retrieved February 5, 2025, from [https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2024/Sep/IRENA\\_Renewable\\_power\\_generation\\_costs\\_in\\_2023.pdf](https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2024/Sep/IRENA_Renewable_power_generation_costs_in_2023.pdf)

1 A recent analysis of the Texas grid, home to “the most renewable energy,” showed by  
2 increasingly relying on solar and wind power and adding battery storage “reliability has  
3 improved dramatically,” “electricity prices there are below the national average,” and the  
4 state has “sharply reduce[d] the chances of blackouts.”<sup>43</sup> Researchers added, “It could be  
5 an example for other grids in how to create reliability at a low cost.”<sup>44</sup>

6 **Q: Overall, why does Renew Missouri support adding these riders?**

7 A: Besides the specific benefits already discussed for each rider program, the Fuel Adjustment  
8 Clause (“FAC”) will be revised to recognize revenues from the Renewable Energy  
9 Program Rider, Green Solutions Rider, and Alternative Energy Credit Rider, and will  
10 return those benefits to all Evergy customers (locally produced energy, more sustainable  
11 energy, lower overall energy prices, reduced peak demand, etc.).

12 Furthermore, we are strongly supportive of customers having the **choice** (or in this case,  
13 **choices**) to adjust their energy consumption (amount and generation sources) according to  
14 their company’s needs. The choices enabled by these tariff riders essentially create  
15 customer-specific pricing and customer-specific generation resources for LLPS customers.  
16 And while these rates will overall have a neutral or positive impact for LLPS customers,  
17 Evergy does not want or foresee them negatively impacting non-participating or non-LLPS  
18 customers.<sup>45</sup> In fact, Evergy says these programs will help ensure new large-load customers  
19 will “pay their share” and “protects existing and non-large load customers, and minimizes  
20 the risk of cost shift.”<sup>46</sup>

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<sup>43</sup> <https://www.reuters.com/sustainability/boards-policy-regulation/trump-calls-wind-solar-bad-power-grid-texas-shows-otherwise-2025-07-10/>

<sup>44</sup> *Id.*

<sup>45</sup> *Direct Testimony of Kevin Gunn*, p. 14.

<sup>46</sup> *Id.*, p. 14-15



1        There is also substantial established demand for such programs. As discussed, many large-  
2        load customers have sustainability goals and these programs would help them meet said  
3        goals. Evergy's RER program is already fully subscribed and not meeting modern large-  
4        load customer needs, in addition to the fact there will be an increased demand for energy  
5        for the foreseeable future.<sup>47</sup> Finally, these programs are all *optional*. LLPS customers will  
6        not be forced to participate. These riders simply allow large-load customers to utilize  
7        programs that align with their business plan and sustainability goals, as they see fit.

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

9        **A:    Yes.**

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<sup>47</sup> EA-2024-0292. Direct Testimony of Kimberly H. Winslow Direct Testimony, p. 6 & 13.  
<https://www.iea.org/news/growth-in-global-electricity-demand-is-set-to-accelerate-in-the-coming-years-as-power-hungry-sectors-expand>  
<https://www.eia.gov/todayinenergy/detail.php?id=65264>  
<https://www.energy.gov/articles/doe-releases-new-report-evaluating-increase-electricity-demand-data-centers>

**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 and Evergy	)	
Missouri West, Inc. d/b/a Evergy Missouri West	)	<u>File No. EO-2025-0154</u>
for Approval of New and Modified Tariffs for	)	
Service to Large Load Customers	)	

**AFFIDAVIT OF JESSICA POLK SENTELL**

STATE OF MISSOURI )


COUNTY OF Wayne )

ss

PARKER DAVID IRONS Notary Public - Notary Seal STATE OF MISSOURI Wayne County My Commission Expires: July 7, 2028 Commission # 24149053
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COMES NOW Jessica Polk Sentell, and on his oath states that he is of sound mind and lawful age; that he prepared the foregoing Rebuttal Testimony; and that the same is true and correct to the best of his knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
Jessica Polk Sentell

Subscribed and sworn before me this 24 day of July, 2025.

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