

Schedule CB-2

***Public Version**

Evergy MO Metro and MO West
Case Name: 2025 Approval of Large Load Service Rate Plan and Associated Tariffs
Case Number: EO-2025-0154

Requestor Caro Frank -
Response Provided April 09, 2025

Question:G-E-7

Referring to page 8, lines 1-2 of Bradley Lutz's Direct Testimony, provide the size in MW of Evergy's current 10 largest customers. If the size of any of these customers is expected to increase, please provide the expected maximum size.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: CONFIDENTIAL

Statement: (1) Material or documents that contain information relating directly to specific customers

Response:

[REDACTED]



Information provided by: Jason Klindt

Attachment(s):

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Brad Lutz*
Director Regulatory Affairs

Evergy MO Metro and MO West
Case Name: 2025 Approval of Large Load Service Rate Plan and Associated Tariffs
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Requestor Caro Frank -
Response Provided April 09, 2025

Question:G-E-11

Referring to page 14, lines 11-13 of Bradley Lutz's Direct Testimony:

- a. Would a threshold level of 90 MW capture "efficiencies and economies of scale that can be leveraged to create rates that are fair and equitable based on the unique needs of these large load customers?" Please explain.
- b. Would a threshold level of 50 MW capture "efficiencies and economies of scale that can be leveraged to create rates that are fair and equitable based on the unique needs of these large load customers?" Please explain.
- c. Can new customers with loads of 90 MW and 50 MW have similar unique needs as customers with load of 100 MW or greater? Please explain.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

- a) The form of this question ignores the primary purpose of the 100 MW threshold. As stated just prior to the lines quoted in this question, the Company states, *"Evergy realized that 100 MW appeared to emerge as a reasonable threshold between its existing and prospective large load customers. The 100 MW threshold will ensure that any large customers who enroll in Schedule LLPS are new customers and will limit the need to convert existing customers to a new tariff."* Benefits for "efficiencies and economies of scale" are secondary and additive to the primary purpose. That said, yes, a threshold level other than 100 MW could capture "efficiencies and economies of scale that can be leveraged to create rates that are fair and equitable based on the unique needs of these large load customers."
- b) See the response to "a"
- c) See the response to "a"

Information provided by: Brad Lutz, Regulatory Affairs

Attachment(s):

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Director Regulatory Affairs

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Requestor Caro Frank -
Response Provided April 09, 2025

Question:G-E-14

Referring to page 15, lines 20-21 of Bradley Lutz's Direct Testimony, explain how the Company determined a contract term of 15 years and provide all supporting documents and analyses used for that determination.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

The Company was influenced by approaches taken by other utilities to select this term. Specifically, the Company observed stipulations agreed to by Amazon Data Services, Inc., the Data Center Coalition, Google, LLC, and Microsoft Corp. In those situations, we noted terms of 12 years (8 years plus 4 years for ramp), 12 years plus up to 5 years for ramp, and 20 years. The Company selected 15 years as within this range and included an allowance for transitional ramp load in the first five years of that term.

Information provided by: Brad Lutz, Regulatory Affairs

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Director Regulatory Affairs

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Requestor Caro Frank -
Response Provided April 09, 2025

Question:G-E-15

Referring to page 17, lines 1-4 of Bradley Lutz's Direct Testimony:

- a. Identify all Company rate schedules with a Grid Charge similar to the Grid Charge proposed for Schedule LLPS.
- b. Describe all substation and transmission-related costs that will be collected in the Grid Charge.
- c. Explain how the substation and transmission-related costs in the Grid Charge will be determined. Please provide examples.
- d. Will any of the substation and transmission-related costs in the Grid Charge that are associated with new investment be used to serve customers other than the LLPS customer?
- e. Explain the relationship between the substation and transmission-related costs in the Grid Charge and the Customer's highest monthly demand in the last 12 months.
- f. Could the substation and transmission-related costs in the Grid Charge be incurred at times other than the time of the Customer's peak demand in the month with the highest monthly demand in the last 12 months? Please explain.
- g. Explain how the Grid Charge relates to the Company's system peak.
- h. Explain how the Grid Charge promotes efficient use and expansion of the transmission system.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

- a) In form, all Evergy Missouri Metro and Missouri West C&I rates include a Facilities Charge to collect costs associated with distribution infrastructure. In the case of LLPS, since service is only at Substation or Transmission voltages, no distribution infrastructure will be used and no cost to recover. The Company renamed the charge to "Grid Charge" to avoid confusion and set pricing for recovery of transmission and substations costs.
- b) The Grid Charge is design to recover substation and transmission costs that would otherwise be recovered in the Demand Charge. This allows the LLPS Demand Charge to be focused on recovery of production costs. In general, the Grid Charge will recover transmission operation &



maintenance costs, allocated administrative & general costs, depreciation & amortization costs, and other allocated expenses.

c) The costs are determined and allocated within the Company class cost of service study. The Company will rely on unit cost presentations to establish initial pricing. Final pricing will be established by alignment with needed revenue requirement and subject to the outcomes of the ratemaking process before the Commission.

d) The Company expects there to be two forms of transmission and substations costs occurring when a large load customer is added, those used to directly serve the customer and those related to network upgrades. Direct costs will be paid by the LLPS customer and not expected to benefit others. Network upgrades are driven by SPP and would be shared by other non-LLPS customers.

e) The "ratchet" function is used in the Facilities Charge applied within other rates (see "a"). It is designed to establish a billing determinate equal to the customers largest demand requirement placed on the system. This is mainly an approach to support billing.

f) Yes, but consistent with our application of the Facilities Charge within our other rates, the past 12 months is the period defined to establish the billing determinant.

g) The Grid Charge does not relate to the system peak.

h) The use of the Grid Charge insures the LLPS customer pays their share of the transmission costs, including those set by SPP. The payment of direct costs by the LLPS customer ensures unique costs to serve an LLPS customer are not borne by others. Alignment of cost to cost causation helps ensure efficient use.

Information provided by: Brad Lutz, Regulatory Affairs

Attachment(s):

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Director Regulatory Affairs

Evergy MO Metro and MO West
Case Name: 2025 Approval of Large Load Service Rate Plan and Associated Tariffs
Case Number: EO-2025-0154

Requestor Caro Frank -
Response Provided April 09, 2025

Question:G-E-19

Referring to page 19, lines 6-11 of Bradley Lutz's Direct Testimony:

- a. Please explain why charging the departing customer (a) an exit fee and (b) the costs of the capacity released by the departing customer is not double recovery of costs.
- b. If the Company uses the capacity released by the departing customer to serve other customers, will the departing customer's exit fee be waived?

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

- a) These fees are not cost recovery fees but instead penalties applied to customers if they deviate from their commitments under the rate. There is no double recovery.
- b) Schedule LLPS customers are not assigned any specific capacity so there is no means to identify what capacity is released when a customer exits the rate. See the answer to "a", the fee is not a cost to be waived but instead a penalty for not adhering to the term commitment.

Information provided by: Brad Lutz, Regulatory Affairs

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Director Regulatory Affairs

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Case Name: 2025 Approval of Large Load Service Rate Plan and Associated Tariffs
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Requestor Caro Frank -
Response Provided April 09, 2025

Question:G-E-32

Referring to page 30, lines 4-9 of Bradley Lutz's Direct Testimony, please list all jurisdictions and tariffs that employ a rider similar to the System Support Rider proposed by the Company.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

The testimony page and lines referenced do not state or imply this rider design is used anywhere else. That said, the Company is not aware of any other utility utilizing this form of Rider.

Information provided by: Brad Lutz, Regulatory Affairs

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Requestor Caro Frank -
Response Provided April 09, 2025

Question:G-E-41

Referring to page 65, lines 1-7 of Bradley Lutz's Direct Testimony:

- a. What is the "System Support Rider – Cost Recovery Component" shown in Figure 5?
- b. Will the System Support Rider be computed separately for each LLPS customer? Please explain.
- c. Will all components of the System Support Rider for each LLPS customer be publicly available? If not, what components will not be publicly available and why?
- d. Will the System Support Rider be fixed for each LLPS customer for the duration of the Service Agreement? If no, please explain each circumstance under which the System Support Rider rate can be changed, including the timing of the changes.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

- a) As noted in the proposed Schedule SR tariff, *"Should the Schedule LLPS Customer's estimated revenue fall below the Customer's estimated rate revenue, an amount, expressed in a dollar per kW (\$/kw) charge, will be added to the customer billing through this Rider charge. The Cost Recovery Component shall be customer-specific and memorialized in Exhibit D of the Customer Service Agreement."* Figure 5 is a representation of the applicable section of the Service Agreement.
- b) Yes, but only the Acceleration Component. See the response to "a".
- c) The Cost Recovery component would be considered Confidential as it is a customer-specific value. It would be available through the standing Commission processes governing this data. The Acceleration component is public and is found on the Schedule SR tariff.
- d) No. As stated in the specimen tariff, the Cost Recovery Component is customer specific and will be calculated annually and could change annually. The Acceleration Component will be calculated as part of each rate case and will change for all Schedule LLPS customer to reflect the current cost of that acceleration.



Information provided by: Brad Lutz, Regulatory Affairs

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Signature /s/ *Brad Lutz*
Director Regulatory Affairs

Evergy MO Metro and MO West
Case Name: 2025 Approval of Large Load Service Rate Plan and Associated Tariffs
Case Number: EO-2025-0154

Requestor Caro Frank -
Response Provided July 11, 2025

Question:G-E-65

The System Support Rider is assessed on Grid Charge billing determinants. Is the System Support Rider subject to an 80% minimum demand charge?

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

Yes. Please also see Google 79 for more on the Grid Charge billing under a minimum bill calculation.

Information provided by: Brad Lutz, Regulatory Affairs

Attachment(s):

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Requestor Caro Frank -
Response Provided July 11, 2025

Question:G-E-77

Will the inclusion of the System Support Rider in schedule LLPS rates result in the collection of revenues associated with acceleration costs before those costs are incurred? Please explain.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

No. Costs are recovered within the proper timing. Costs of any generation resources added will be recovered within the ratemaking process as these resources are completed and are deemed in service. The Acceleration Charge will generate a revenue stream that will help offset cost effected caused by the accelerated need for these resources. Please recall, the Acceleration Component is not tied to any specific resource cost.

Information provided by: Brad Lutz, Regulatory Affairs

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Director Regulatory Affairs

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Case Name: 2025 Approval of Large Load Service Rate Plan and Associated Tariffs
Case Number: EO-2025-0154

Requestor Caro Frank -
Response Provided July 21, 2025

Question:G-E-79

Please refer to the testimony of Mr. Lutz on page 17, line 9 through line 10, “The minimum demand ensures that each month customers will pay for 80 percent of the contract capacity amount,” and page 18, line 13 through line 16, “Under Schedule LLPS, the minimum monthly bill will require payment of the non-energy components of the tariff, specifically, the sum of the Customer Charge, Grid Charge, Demand Charge, and Reactive Demand Adjustment.”

- a. Will the Grid Charge be subject to a minimum demand charge equal to 80 percent of the contract amount? If not, please explain.
- b. Will the System Support Rider (“SSR”) be subject to a minimum demand charge equal to 80 percent of the contract amount? If not, please explain.
- c. Will any other kW charge be subject to a minimum demand charge equal to 80 percent of the contract amount? If not, please explain. If so, please specify the specific kW charges.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

- a. Yes, as stated in testimony, “*The charge will be based on the Customer’s highest monthly demand in the last 12 months.*” Should the Customer not have a measured value available to support the minimum bill calculation, the Company would rely on 80% of the Contract Capacity defined in the Service Agreement for the period as the billing determinant for this charge.
- b. Yes, subject to the conditions expressed in “a”.
- c. In addition to the Grid Charge, Demand Charge, Reactive Demand Adjustment and System Support Rider, the Company Transmission Delivery Charge would be applicable



as kW-based charges. In general, the minimum bill will be determined as if the kWh values are set to zero.

Information provided by: Brad Lutz, Regulatory Affairs

Attachment(s):

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Signature /s/ *Brad Lutz*
Director Regulatory Affairs

Evergy MO Metro and MO West
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Case Number: EO-2025-0154

Requestor Caro Frank -
Response Provided July 18, 2025

Question:G-E-88

Please refer to the testimony of Mr. Martin on page 8 lines 6 through 8, “Going forward, the Company will study new loads in a “cluster” basis with up to four projects at a time known as the active queue.”

- a. Will the four project limit apply regardless of the size of the projects? Please explain.
- b. Will the four project limit apply regardless of the size of the queue of projects waiting to be interconnected? Please explain.
- c. Under what conditions would the Company consider expanding the cluster to more than 4 projects?

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

- a. Yes. The size of the projects is not relevant to the work needed to advance these projects through the active queue. Each project has multiple agreements, as discussed in testimony, that require technical analysis, legal review and contractual negotiations.
- b. Yes. Solving for the infrastructure and energy supply needs requires detailed customer input regarding load ramp and timing. The Company utilizes this information to determine how and when we can serve these loads.
- c. Greater regulatory certainty on energy supply requirements and SPP future process changes, more technical staffing, diversification of the location of the projects, and more accurate customer load ramp information and timing.



Information provided by: Jeff Martin

Attachment(s):

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Signature /s/ *Brad Lutz*
Director Regulatory Affairs



Evergy MO Metro and MO West
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Case Number: EO-2025-0154

Requestor Schulte Andrew -
Response Provided July 24, 2025

Question: G-E-90

Please provide a copy of the large load project ramp details as shared during a June 12, 2025 discussion with Kansas stakeholders.

RESPONSE: (do not edit or delete this line or anything above this)

Confidentiality: PUBLIC

Statement: This response is Public. No Confidential Statement is needed.

Response:

Below is the detail shared.

Question 2 - Large Load Project Ramp Details

Load ramps shown in MW (annual peak load)¹

Customer or Project Name	Jurisdiction	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	Load Factor
Project 1	EMW	60	84	93	93	93	93	93	93	93	93	85-90%
Project 2	EKC	190	190	190	190	190	190	190	190	190	190	85-90%
Project 3	MET	4	105	158	160	176	274	452	552	619	680	85-90%
Project 4	EMW		9	139	153	170	230	290	350	410	425	85-90%
Project 5	EKC			125	304	447	590	769	769	769	769	85-90%
Project 6	EMW				92	280	481	665	756	773	777	85-90%
Project 7	MET			20	150	250	250	250	250	250	250	85-90%
Project 8	EKC			30	130	230	330	430	530	530	530	85-90%
Project 9	EMW				47	258	282	282	282	282	282	85-90%
Project 10	EKM	12	12	30	30	60	60	60	60	60	60	85-90%
Total		266	400	785	1349	2154	2780	3481	3832	3976	4056	85-90%

Information provided by: Brad Lutz

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Director Regulatory Affairs