

Exhibit No. 159

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Evergy Missouri West – Exhibit 159
Testimony of Peter Rogge
Direct
File No. ER-2024-0189

Public Version

Exhibit No.:
Issue: Crossroads Relocation Study
Witness: Peter Rogge
Type of Exhibit: Direct Testimony
Sponsoring Party: Evergy Missouri West
Case No.: ER-2024-0189
Date Testimony Prepared: September 15, 2025

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. ER-2024-0189

DIRECT TESTIMONY

OF

PETER ROGGE

ON BEHALF OF

EVERGY MISSOURI WEST

**Kansas City, Missouri
September 2025**

DIRECT TESTIMONY

OF

PETER ROGGE

Case No. ER-2024-0189

1 **Q: Please state your name and business address.**

2 A: My name is Peter Rogge. My business address is 1200 Main Street, Kansas City,
3 Missouri 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Evergy Metro, Inc. and serve as Senior Manager Engineering –
6 Generation Engineering Services for Evergy Metro, Inc. d/b/a as Evergy Missouri
7 Metro (“EMM”), Evergy Missouri West, Inc. d/b/a Evergy Missouri West
8 (“EMW”), Evergy Metro, Inc. d/b/a Evergy Kansas Metro (“EKM”), and Evergy
9 Kansas Central, Inc. and Evergy South, Inc., collectively d/b/a as Evergy Kansas
10 Central (“EKC”) the operating utilities of Evergy, Inc.

11 **Q: Who are you testifying for?**

12 A: I am testifying on behalf of Evergy Missouri West (“EMW” or “Company”).

13 **Q: What are your responsibilities?**

14 A: My responsibilities include managing a team of engineers who provide engineering
15 support for our fleet of Power Generation facilities. My team primarily plans and
16 executes capital projects, including engineering studies.

17 **Q: Please describe your education, experience, and employment history.**

18 A: I was educated at the University of Missouri – Columbia, earning a Bachelor of
19 Science in Mechanical Engineering (cum laude). I started my career in 2006 at

1 Black & Veatch (B&V) as a design engineer in their Power division. I became a
2 licensed Professional Engineer during my time at B&V. I started at Evergy
3 (formerly Kansas City Power & Light) in 2012 as a Performance Engineer,
4 promoting to engineering management in 2017.

5 **Q: Have you previously testified in a proceeding at the Missouri Public Service**
6 **Commission (“MPSC” or “Commission”) or before any other utility**
7 **regulatory agency?**

8 A: No.

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

10 A: The purpose of my direct testimony is to present findings from a study that was
11 performed by B&V (“B&V Study”) to evaluate the cost, procedures, and schedule
12 of relocating Crossroads to a site in the Southwest Power Pool (“SPP”) footprint.
13 The B&V Study was agreed to in section 5 of the Unanimous Stipulation and
14 Agreement in EMW’s last rate case (ER-2024-0189). A copy of section 5 is
15 attached as Schedule PR-1. A copy of the B&V Study is attached as Confidential
16 Schedule PR-2.

17 **Q: Please summarize your testimony, including what is being asked of the**
18 **Commission?**

19 A: To summarize the B&V Study, several potential sites were identified, analyzed, and
20 ultimately three sites were selected to evaluate for relocating Crossroads. The three
21 sites included an active generation site (Osawatomie, KS), a retired generation
22 ‘brownfield’ site (Tecumseh, KS), and a ‘greenfield’ site (Sparta, MO). The B&V
23 Study also evaluated performing an “Advanced Gas Path” (AGP) upgrade as part

1 of the relocation to Sparta. Last, the B&V Study looked at the cost of installing four
2 new GE 7EA units at Tecumseh to compare the cost of equivalent new units versus
3 relocation. The B&V Study produced indicative cost estimates and schedules for
4 these five scenarios. The Company asks the Commission to consider the B&V
5 Study when adjudicating rate treatment of the disputed transmission costs for
6 Crossroads.

7 **Q: Please describe your participation in the B&V Study?**

8 A: Generally, my role was to execute this study on behalf of Evergy. First, my
9 participation included drafting the Request for Proposal (RFP) with direct
10 involvement from Missouri Public Service Commission Staff (Staff) and Office of
11 Public Counsel (OPC). The RFP documents included requirements for the scope of
12 the study and a scorecard for evaluating the proposals and selecting an engineering
13 firm. We met with Staff and OPC in person in Jefferson City, MO to gather input
14 and finalized the RFP documents. Proposals were solicited and received from Burns
15 & McDonnell, Kiewit, and Black & Veatch. EMW, Staff, & OPC each scored these
16 proposals separately and unanimously selected B&V to perform the study.

17 After developing a contract agreement, and issuing a Purchase Order (PO),
18 B&V initiated the study with a kickoff meeting including EMW, Staff, and OPC.
19 B&V, EMW, and Staff also travelled to Clarksdale, MS for a site visit. EMW
20 provided B&V with comprehensive technical information on the Crossroads plant.

21 B&V then began the siting study to determine possible host sites for the
22 relocated units. Information was provided on Evergy-owned sites, and other
23 possible sites that were identified in siting studies for the recent new gas

1 developments. B&V scored and compared these sites and ultimately shortlisted five
2 sites to study in more detail, including one site that B&V independently identified
3 to minimize transportation distance. Details of these five sites were collected,
4 reviewed, and scored, ultimately selecting three sites for developing indicative cost
5 and schedule. B&V then drafted the study, including alternatives for upgrading the
6 existing units or purchasing new equivalent units.

7 Throughout this study, Staff and OPC were included in all meetings;
8 providing input and feedback to B&V. I also provided input and gave feedback to
9 B&V from an owner/operator's perspective. After the study was completed, I
10 assembled Owner Cost information, which is amended to the B&V Study and
11 provides a comprehensive estimate of costs for a relocation project of this type.

12 **Q: Does that conclude your testimony?**

13 **A: Yes, it does.**

5. Crossroads:

a. For purposes of this rate case, the Signatories agree to an extension of Issue 5.C. from the Commission's List of Issues regarding the renewal of the firm point-to-point transmission service agreement between EMW and Entergy Corp. that will permit a Demobilization Study ("Study") related to the Crossroads Energy Center ("Crossroads" or "plant") to be performed by a qualified independent engineering firm (e.g., Burns & McDonnell or Black & Veatch) to evaluate the cost, procedures, and schedule of relocating Crossroads to a site in the Southwest Power Pool ("SPP") footprint.

b. Staff and OPC will be directly involved in the Request for Proposal ("RFP") process to determine the scope of the Study such that the results of the RFP can be viewed as an impartial analysis from the prospective bidders / evaluators who respond to the RFP which covers the issues and information that Staff, OPC, and Company require to be studied. The Study of sites in SPP will include consideration of the sites being presently considered by Evergy for future capacity additions fueled by natural gas in SPP. The Study will also evaluate estimated costs based on the scope of work described within the RFP.

c. The Signatories agree to the following timeline for the Study:

- July 15, 2025: Study to be completed. If the Study is completed before this date, all subsequent deadlines will be moved relative to the completion date of the Study.
- August 15, 2025 (30 days): Negotiation deadline for settlement.
- September 15, 2025 (60 days): Direct testimony (filed by all Signatories if no settlement)
- October 15, 2025 (90 days): Rebuttal testimony (filed by all Signatories)
- November 3-7, 2025 (105 days): Evidentiary hearing.
- December 31, 2025 (160 days): Recommended decision date by the Commission

d. Discovery with a twenty calendar-day response time related to the Crossroads studies is available during the pendency of this docket.

e. Once the Study is received by the Company, it will provide copies of the Study to all Signatories. The Signatories will promptly meet to determine if a workable solution regarding Issue 5.C. and any other issues related to the relocation or sale of Crossroads can be reached with a stipulation and agreement ("stipulation"). Such a stipulation will be filed with the Commission by August 15, 2025.

f. If a stipulation cannot be reached, Issue 5.C. and any other issues related to the relocation or sale of Crossroads will be heard at a separate hearing in this docket no later than November 3, 2025. The hearing will be completed by November 7, 2025. The Signatories request that the Commission issue its decision by December 31, 2025. At the time of such hearing the Signatories will not be limited in presenting their arguments on the Crossroads issues.

g. If the Signatories agree by stipulation and agreement that Crossroads should be moved, such agreement shall contain a provision that it is decisionally prudent for EMW to procure replacement capacity, as necessary to meet EMW's SPP capacity requirements and energy demand requirements while Crossroads is offline. While the procurement of additional capacity shall be agreed to by the Signatories, the cost of such capacity and energy would still be subject to a subsequent prudence review.

h. The cost of Study shall be recovered from customers with a cap of \$500,000.

i. Signatories agree that EMW will perform a market valuation study to evaluate the indicative value of the Crossroads assets. The market valuation study would include both indicative third-party asset sale bids as well as indicative MISO capacity sale valuation. Market valuation study to be completed by December 1, 2024.

**SCHEDULE PR-2
CONTAINS CONFIDENTIAL
INFORMATION
NOT AVAILABLE TO THE PUBLIC.

ORIGINAL FILED UNDER SEAL.**

**Evergy Metro, Inc. d/b/a Evergy Missouri Metro and
Evergy Missouri West, Inc. d/b/a Evergy Missouri West**

Docket No.: ER-2024-0189

Date: September 15, 2025

CONFIDENTIAL INFORMATION

The following information is provided to the Missouri Public Service Commission under CONFIDENTIAL SEAL:

Document/Page	Reason for Confidentiality from List Below
Schedule PR-2	3, 4, and 5

Rationale for the “confidential” designation pursuant to 20 CSR 4240-2.135 is documented below:

1. Customer-specific information;
2. Employee-sensitive personnel information;
3. Marketing analysis or other market-specific information relating to services offered in competition with others;
4. Marketing analysis or other market-specific information relating to goods or services purchased or acquired for use by a company in providing services to customers;
5. Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public;
6. Strategies employed, to be employed, or under consideration in contract negotiations;
7. Relating to the security of a company's facilities; or
8. Concerning trade secrets, as defined in section 417.453, RSMo.
9. Other (specify) _____.

Should any party challenge the Company’s assertion of confidentiality with respect to the above information, the Company reserves the right to supplement the rationale contained herein with additional factual or legal information.