

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

In the Matter of the Proposed Rule 20 CSR	)	
4240-23.040 State Reliability Mechanism	)	File No. EX-2026-0171
(SRM)	)	

**EVERGY’S COMMENTS ON PROPOSED RULE 20 CSR 4240-23.040  
STATE RELIABILITY MECHANISM (“SRM”) AND REPORTING TEMPLATE**

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (Evergy Missouri West”) (collectively, “Evergy” or the “Company”) and, for their comments, state as follows:

1. On January 14, 2026, the Missouri Public Service Commission (“Commission”) issued its Finding of Necessity and Order Directing that Propose Rule 20 CSR 4240-23.040 Be Filed for Publication, and on January 23, 2026, the Commission issued a Notice of Hearing and Comment Period. The Notice of Hearing and Comment Period requested submission of written comments by March 25, 2026.

2. Comments on Proposed Rule

a. *Definition of Demand-side resources, Subsection (I)(J)*

Evergy suggests that the definition of Demand-side resources be removed from the draft rule. The definition is unnecessary because the term is not used within the draft rule and template.

b. *Definition of Demand response resources, Subsection (I)(K)*

Evergy suggests that the definition of demand response resources be changed as reflected in this redline:

Demand response resources means resources that are considered by the appropriate RTO/ISO in resource adequacy determinations that can be dispatched by the appropriate RTO/ISO or electrical corporation to reduce or shift demand. Demand response is the quantified impact reduction of

electricity consumption, across one or more customer sites deployed in response to system reliability needs or an economic price signal. Demand Response measurement requires metering and baselines to ensure that load reductions are real, quantifiable, and eligible to participate alongside traditional supply resources.

The suggested revisions to the definition are a better reflection of how SPP and MISO approach demand response.

*c. Definition of Transmission Losses, Subsection (1)(II)*

Evergny suggests that the definition of transmission losses be changed as reflected in this redline:

(II) Transmission losses means the amount of real power, expressed as a percentage, that is lost ~~during the~~ in transmission facilities, when delivering energy to load ~~of electricity from generation resources to an electrical corporation's interconnection point;~~

Evergny believes that the proposed revised definition better aligns with the calculation of actual transmission losses.

*d. Subsection (3), Reporting*

Due to anticipated changes in SPP related to submission dates, Evergny proposes that Subsections (3)(B) and (C) be changed as reflected in this redline:

(B) ~~Annually, but n~~ No later than January 14, thirty days after SPP makes a final determination as to the electrical corporation's resource adequacy requirements for each upcoming planning season as defined in Attachment AA of the SPP Tariff, each electrical corporation that takes part in the SPP resource adequacy process shall submit ~~an~~ SRM Reporting Template required by section (2) for the ~~winter~~ applicable planning season reflecting the electrical corporation's plan to own or have rights to sufficient capacity to meet its capacity obligations.

(C) ~~Annually, but no later than July 15,~~ each electrical corporation that takes part in the SPP resource adequacy process shall submit an SRM Reporting Template required by section (2) for the ~~summer~~ planning season reflecting the electrical corporation's plan to own or have rights to sufficient capacity to meet its capacity obligations.

Evergy's proposed changes to Subsections (3)(B) and (C) will allow the rule to be consistent with the statutory language in Section 393.1080 RSMo as applied to the SPP planning seasons. The proposed changes will provide the rule with flexibility so the rules will not become outdated when SPP makes changes to its planning seasons or submission deadline dates. Evergy's proposed changes to Subsection (3)(B) capture requirements associated with both the summer planning season and winter planning season, so a separate Subsection (3)(C) is no longer needed. Should Evergy's proposed changes be adopted, Evergy suggests that the definitions of Summer planning season in subsection (1)(GG) and winter season in subsection (1)(KK) may be removed. Additionally, Subsection (3)(D) should be renumbered to (3)(C).

3. Comments on Proposed Template

a. *Addressing purchases and sales - See Sheets 5 and 6*

Evergy recommends that purchase and sale be included together on one sheet, rather than on two separate sheets. Evergy also recommends that the sheet for reporting purchases and sales also include a place for reporting of system sales, which occur when a utility sells capacity from its system that is not from a specific unit or resource.

b. *Accreditation Methodology for Planned Resources-See Sheet 7*

On sheet 7, Evergy recommends removal of the accreditation methodology for planned resources.

4. In conclusion, the suggested changes are designed to provide additional clarity, consistency, and operational efficiencies for utilities in the reporting requirements consistent with

the statutory requirements. Evergy believes the proposed rule and reporting template, with these changes, will allow utilities to efficiently and affordably implement the rule.

**WHEREFORE**, for the foregoing reasons, the undersigned respectfully submits the foregoing comments and recommends the Commission adopt proposed rule as published, except that it should adopt the proposed modifications as outlined herein.

Respectfully submitted,

*/s/ Roger W. Steiner*

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**ATTORNEY FOR EVERGY MISSOURI  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing application was emailed on this 25<sup>th</sup> day of March 2026 to counsel for all parties of record.

*/s/ Roger W. Steiner*

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Roger W. Steiner