BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's 2026 Integrated Resource Plan Annual Update Filing	)))	**File No. EO-2026-0188**
In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's 2026 Integrated Resource Plan Annual Update Filing	)))	**File No. EO-2026-0189**

STAFF COMMENTS

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through the undersigned counsel, and states the following:

1. Staff reviewed the 2026 Integrated Resource Plan ("IRP") annual update filings submitted on May 7, 2026, by Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (collectively "Evergy" or the "Companies"). Additionally, Staff attended the stakeholder presentation ("workshop") that took place on June 26, 2026, related to these filings.

2. Attached and incorporated herein as Appendix A is Staff's Memorandum detailing Staff's comments regarding the annual update and summary report in this matter.

3. According to 20 CSR 4240-22.080(3)(B), an annual update report, consisting of both a public and highly-confidential version, must document information to be presented at the annual update workshop. The utility must file the annual update reports with the Commission at least 20 days before the workshop. Following the workshop, as per 20 CSR 4240-22.080(3)(C), a summary report outlining the action items from the workshop is required, and it is to be submitted within 10 days after the workshop.

Stakeholders have a 30-day window, as stated in 20 CSR 4240-22.080(3)(D), to submit comments on the annual update report and summary report to the Commission subsequent to the Company's summary report filing. Staff and Counsel are of the opinion the Companies have complied with 20 CSR 4240-22.080.

4. Staff notes Evergy's annual update filings, including the 2026 Annual Update, closely resemble triennial compliance filings. As outlined in 20 CSR 4240-22.080(7),[1] each triennial compliance filing undergoes a review, with a report due not later than 150 days after the utility's scheduled filing date. Even though annual update filings are similar in scope to triennial compliance filings, the review time is roughly half that of triennial compliance filings. The Commission's rule regarding annual updates does not contemplate any action by the Commission, and the cases are most often closed with no further action beyond the filing of comments by stakeholders.

5. Furthermore, the Companies frequently use triennial compliance filings and annual update filings as justification for certificates of convenience and necessity. Evergy's annual update filings are comprehensive and comparable to triennial updates. However, Staff's limited review period for the Companies' 2026 Annual Update Filings is insufficient for thorough review. As a result, neither Staff's comments nor their absence should be interpreted as endorsement of Evergy's 2026 Annual Updates.

[1] Staff must review each triennial compliance filing and provide a report within 150 days of the filing date. The report should identify deficiencies in compliance, major deficiencies in methodologies, and other issues, and provide a suggested remedy. Staff may also address concerns related to the preferred resource plan or acquisition strategy. If no deficiencies or concerns are found, staff must state so in the report. Staff's report stating compliance is not acceptance or agreement with the substantive findings.

WHEREFORE, Staff respectfully submits its Staff Comments regarding the Annual Updates of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc., d/b/a Evergy Missouri West.

Respectfully submitted,

/s/ Carolyn H. Kerr
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to the parties of record as listed in the Service List maintained for this case by the Commission's Data Center, on this 29th day of July, 2026.

/s/ Carolyn H. Kerr

M E M O R A N D U M

TO: Missouri Public Service Commission Official Case File
File Nos. EO-2026-0188 and EO-2026-0189
Evergy Metro, Inc., d/b/a Evergy Missouri Metro
Evergy Missouri West, Inc., d/b/a Evergy Missouri West

FROM: Michael Stahlman, Senior Economist

SUBJECT: Staff Comments on the 2026 IRP Annual Updates For Evergy Metro, Inc., d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc., d/b/a Evergy Missouri West

DATE: July 29, 2026

EXECUTIVE SUMMARY

Pursuant to Commission Rule 20 CSR 4240-22.080 (Filing Schedule, Filing Requirements, and Stakeholder Process), permitting stakeholders to file comments with the Commission concerning the utility's Annual Update report within thirty (30) days of the utility's filing of the summary report,[1] Staff respectfully submits these comments regarding the 2026 Integrated Resource Plan ("IRP") Annual Updates ("2026 Annual Updates") for Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("EMM") and Evergy Missouri West, Inc. d/b/a Evergy Missouri West's ("EMW") (collectively, "Evergy"), filed on May 7, 2026, in Case Nos. EO-2026-0188 and EO-2026-0189, respectively. Based on Staff's limited review, it provides the following comments on Evergy's 2026 Annual Updates.

Background

The 2026 Annual Updates are the second annual update following Evergy's 2024 Triennial Integrated Resource Plan.[2] Evergy's Preferred Resource Plan changed in the 2025 Annual IRP Updates and further changed in this 2026 Annual Updates. The changes for EMM and EMW are shown in Tables 1 and 2 respectively below.

[1] The summary report was filed as Notice of No Change to IRP on June 30, 2026.
[2] Case Nos. EO-2024-0153 and EO-2024-0154.

APPENDIX A

Table 1: Evergy Missouri Metro Preferred Plan Comparison

	2024 Triennial IRP	2025 IRP Annual Update	2026 IRP Annual Update
Retirements	LaCygne 1 in 2032 LaCygne 2 in 2039 Iatan 1 in 2039	LaCygne 1 in 2032 LaCygne 2 in 2039 Iatan 1 in 2039	LaCygne 1 in 2038
Wind Additions	150 MW in 2029 150 MW in 2030 150 MW in 2031 150 MW in 2033 150 MW in 2034 150 MW in 2035 150 MW in 2042	150 MW in 2028 150 MW in 2029 150 MW in 2034 150 MW in 2035 150 MW in 2044	n/a
Solar Additions	300 MW in 2027 150 MW in 2028 150 MW in 2040	300 MW in 2027 150 MW in 2030 300 MW in 2036 300 MW in 2038 300 MW in 2041 300 MW in 2042 300 MW in 2043	150 MW in 2028
Battery Additions	n/a	150 MW in 2030	150 MW in 2030
Thermal Additions	415 MW CT in 2032 324 MW CC in 2036 324 MW CC in 2038 324 MW CC in 2039 324 MW CC in 2041	440 MW CT in 2031 355 MW CC in 2032 355 MW CC in 2033 355 MW CC in 2037 355 MW CC in 2039 355 MW CC in 2040	440 MW CT in 2031 355 MW CC in 2032 440 MW CT in 2035 440 MW CT in 2038 355 MW CC in 2040 355 MW CC in 2042 148 MW RICE in 2044
New DSM Programs	RAP +	MEEIA Cycle 4 Extended Demand Response	Continueation of Demand Response

Table 2: Evergy Missouri West Preferred Plan Comparison

	2024 Triennial IRP	2025 IRP Annual Update	2026 IRP Annual Update
Retirements	Lake Road 4/6 in 2030 Jeffrey 3 in 2030 Jeffrey 2 in 2030 Iatan 1 in 2039 Jeffrey 1 in 2039	Lake Road 4/6 in 2030 Jeffrey 3 in 2031 Iatan 1 in 2040 Jeffrey 1 in 2040 Jeffrey 2 to NG in 2030	Lake Road 4/6 in 2038 Jeffrey 3 in 2036 Jeffrey 2 to NG in 2035
Wind Additions	150 MW in 2031 150 MW in 2032 150 MW in 2033 150 MW in 2034 150 MW in 2041	150 MW in 2028 150 MW in 2031 150 MW in 2032 150 MW in 2033 150 MW in 2034 150 MW in 2035 150 MW in 2037 150 MW in 2038 150 MW in 2039 150 MW in 2041 150 MW in 2042	n/a
Solar Additions	150 MW in 2027 150 MW in 2042	165 MW in 2027 150 MW in 2036 150 MW in 2044	165 MW in 2027 150 MW in 2035
Battery Additions	n/a	n/a	n/a
Thermal Additions	325 MW CC in 2029 415 MW CT in 2030	355 MW CC in 2029 440 MW CT in 2030 355 MW CC in 2030 355 MW CC in 2040	355 MW CC in 2029 440 MW CT in 2030 355 MW CC in 2030 355 MW CC in 2032 355 MW CC in 2036 355 MW CC in 2040
New DSM Programs	RAP +	MEEIA Cycle 4 Extended Demand Response	Continueation of Demand Response

In Case Nos. EO-2026-0035 and EO-2026-0036, the Commission Ordered the following special contemporary issues to be analyzed and documented in the 2026 Annual Updates:

A. Discrete timeline for permitting processes and construction activities of a nuclear power plant:

i. At an existing site;
   a. Include discussion on transmission capacity needs;

ii. At a greenfield site;

iii. Tax credit availability and likelihood of being able to achieve current milestones; and
iv. Discussion on systems that track nuclear-based energy attribute certificates/credits and discussion on State policies (renewable or clean energy standards) that include nuclear-based energy attributes.

B. Large load customers:

i. Current pipeline of large load customers and which are likely to materialize;
ii. Discussion on interconnection;

C. Model Renewable Energy Standard (RES) Requirement Generation in Various Large Load Scenarios;

D. Geologic Hydrogen Onsite or Near Natural Gas Storage.

Staff's Review

The Commission's current Integrated Resource Planning rules are found in 20 CSR 4240-22. In particular, 20 CSR 4240-22.080(4) states:

> It is the responsibility of each utility to keep abreast of evolving electric resource planning issues and to consider and analyze these issues in a timely manner in the triennial compliance filings and annual update reports.

With this in mind, Staff offers the following concerns:

<u>Concern #1</u>: Evergy's analysis was artificially limited by its own internal constraints.

Despite a large increase in projected load, Evergy limited its review of new generation in its capacity expansion model. Evergy did not consider any new base load generation, which is generally seen as the cheapest way to provide continuous power in all hours and is fundamental to the physical stability of the grid. This limitation may be due, in part, to Evergy's internal policy of being carbon free by 2050.

Additionally, Evergy limited its review of Intermediate Capacity to half of a combined cycle generator in its capacity expansion model. A combined cycle generator ("CC") is essentially a combustion turbine generator ("CT") with an additional heat exchanger that captures the waste heat in order to improve the overall efficiency of the generator. In the stakeholder group meeting, Evergy stated that this limitation was due to capital constraints. However, while not allowing for a full CC in a given year, Evergy's capacity expansion model did allow for a half of a CC and a full CT in the same year despite the similarity in expected capital cost on a per MW basis.

Concern #2 Evergy's analysis and preferred plan do not meet the Renewable Energy Standard ("RES") Requirement in 2036 and 2037

Evergy states that both EMM and EMW's preferred plans fail to meet the RES requirement around 2036 and 2037 respectively.[3] Evergy later states that the "capacity expansion models were not calibrated to solve for [meeting the RES requirement]."[4] However, it is possible that Evergy would still meet the RES requirements under the preferred plan if a large load customer included in its current load forecast becomes an accelerated renewable buyer, consistent with Section 393.1030, RSMo. Staff further notes Commission rule 20 CSR 4240-20.100(8)(B) requires each utility to file a RES compliance plan covering the current year and two subsequent years. Additionally, utilities may purchase RECs from external sources.

Concern #3: Evergy's analysis did not fully consider limitations of natural gas pipeline capacity.

Evergy's 2026 Preferred Plan increases thermal additions that are primarily fueled by natural gas. Evergy does acknowledge some limitations to natural gas supply in EMM's discussion on the Mullen Creek site,[5] natural gas is generically treated as having one price for all proposed generators with a firm fuel supply.[6] Evergy further states that they expect to use fuel oil at the Mullen Creek site during extreme cold weather events,[7] but the price of the fuel oil does not appear in 1898 & Co.'s 2025 Wholesale Market Price Forecasts. It's unclear that Evergy's model accounts for the cost or differences in dispatch for the proposed Mullen Creek CT to account for dual fuel operation. There is no discussion about utilizing dual fuel resources in EMW's 2026 Annual Update. The natural gas price for these generators is a critical uncertain factor.[8] It is likely that the assumed resource accreditation or presumed operational costs would be different as Evergy moves from a generic thermal addition to a site-specific generation addition.

[3] EMM 2026 Annual IRP Report, page 101 and EMW 2026 Annual IRP Report, page 97.
[4] EMM 2026 Annual IRP Report, page 137 and EMW 2026 Annual IRP Report, page 133.
[5] EMM 2026 Annual IRP Report, page 121.
[6] EMM 2026 Annual IRP Report, page 50 and EMW 2026 Annual IRP Report, page 49.
[7] EMM 2026 Annual IRP Report, page 121.
[8] EMM 2026 Annual IRP Report, page 27 and EMW 2026 Annual IRP Report, page 26.

<u>Concern #4</u>: *Evergy's analysis of battery technology was limited.*

Evergy's analysis only reviewed 4-hour batteries and did not consider other configurations, such as 6 and 8-hours, as a potential resource.

<u>Concern #5</u>: *Evergy did not account for potential extension of safe harbor for renewables in any scenario.*

While the tax credits on solar and wind generation are due to expire, recent history suggests that there is a reasonable chance that the tax credits get extended for a few more additional years. Staff is concerned that Evergy's analysis did not consider an extension as a possibility, and what the impact of an extension of the tax credits would be on its current preferred portfolio.

Staff's Review of Contemporary Issues

<u>Nuclear Power Plan Timelines</u>

While Evergy did include a discrete timeline for the processes and construction of a nuclear plant at a greenfield site, the discussion for an existing site was less discrete. Evergy's discussion focused on the Wolf Creek site and states that a few activities would be shortened. The discussion on transmission capacity was also limited, essentially stating that it needs to be analyzed. This limited analysis may be due to the way generation interconnection projects are reviewed in the Southwest Power Pool ("SPP"); Staff's understanding is that SPP reviews generator interconnection studies in batches so Evergy would need to know what other generation was being interconnected with a hypothetical nuclear reactor to know what additional transmission capacity would be required.

<u>RES Requirement under Various Large Loads</u>

As discussed in Concern #2, Evergy's proposed preferred plans do not meet the RES requirement. In this section, Evergy discusses the additional shortfall from the RES requirement but does not review the capacity expansion model or perform NPVRR (Net Present Value Revenue Requirement) analysis to optimize solutions to meet the RES requirement.[9] As noted in Concern #2, Evergy's analysis did not make any assumptions if a Large Load Customer qualified as an accelerated renewable buyer.

Conclusion

Overall, Staff is concerned that Evergy's analysis is short-sighted and focuses only on meeting short-term needs without considering longer term solutions that can prove more affordable to its customers. Neither baseload generation, which requires a longer time period to develop and construct, nor constructing full CCs were considered. The emphasis on short-term projects is highlighted when Evergy stated that it "does not plan to execute on 2037 resources this early in the planning process."[10] Evergy's preferred plans also did not discuss the interaction between the RES legal requirements and large load customers. This means that the preferred plan comparisons shown in Tables 1 and 2 are incomplete and likely to change in subsequent IRP filings. Evergy's short term view means that it is likely the Commission will continue to only be presented with multiple Certificates of Convenience and Necessity ("CCN") filings with relatively expensive projects to fulfill immediate needs which will prompt frequent general rate case proceedings.

Concerns not expressed in Staff's comments should not be viewed as an endorsement of any part of Evergy's 2026 Annual Updates. For the reasons stated above and due to the limited time to fully review this filing, Staff recommends that the Commission not rely on this analysis to justify any CCN filings.

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[9] In addition to not calibrating the capacity expansion model, as discussed in Concern #2, Evergy states, "NPVRR analysis was not done for plans other than Plan ACAA [ADAA for EMW], as they are contingency plans listed in Section 11 of this IRP." EMM 2026 Annual IRP Report, page 139 and EMW 2026 Annual IRP Report, page 135.

[10] EMM 2026 Annual IRP Report, page 104 and EMW 2026 Annual IRP Report, pages 100-101.

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In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West's 2026 Integrated Resource Plan Annual Update Filiing	)))	File No. EO-2026-0189

AFFIDAVIT OF MICHAEL L. STAHLMAN

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW MICHAEL L. STAHLMAN and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Comments*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

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MICHAEL L. STAHLMAN

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 28th day of July 2026.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2027
Commission Number: 15207377

Dianna L. Vaught
Notary Public