BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Missouri 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

CITY OF KANSAS CITY'S COMMENTS REGARDING INTEGRATED RESOURCE PLAN ANNUAL UPDATE FILINGS

Pursuant to 20 CSR 4240-22.080(3)(D), the City of Kansas City (the "City") hereby provides its comments to Evergy Missouri Metro's and Evergy Missouri West's (collectively "Evergy") filing of its 2026 Integrated Resource Plan Annual Update Summary Reports (the "2026 IRP Update").

INTRODUCTION

Among the core objectives of City of Kansas City, Missouri ("the City") is the preservation and improvement of the health, economic well-being and resiliency of its citizens and community. These objectives are reflected in the City's Climate Protection and Resiliency Plan, adopted by the City Council in 2022, focuses on a framework for how our community will work together to achieve a carbon-neutral, equity-focused, and resilient Kansas City by 2040.

A top priority for immediate action identified by the Committee is to "participate in energy decisions of the Public Service Commission." Specifically, Plan strategy E1.1: Expand utility-owned renewable energy production, compels this intervention and these comments by calling for the City to "encourage Evergy to continue to invest in local renewable energy production through utility-scale solar and wind projects, to increase the percentage of renewable energy in the grid mix through the integrated resource planning ("IRP") process." This and other strategies form the basis for these comments, and specifically, to call into question Evergy's 2026 IRP Update ("Update") plan.

The City has multiple concerns, more fully described below, as Evergy's 2026 IRP Update:

- Puts Kansas City at Risk of Violating National Ambient Air Quality Standards;
- Does Not Align with the Kansas City Community's Goals;
- Does Not Model Health Impacts and Costs;
- Overestimates Costs of Renewables and Battery Storage;
- Does Not Include Existing and Planned Commercial Solar as a Resource; and
- Does Not Include Distributed Energy Resources, Including but not Limited to Demand-Side Management, Energy Efficiency, and Battery Storage, as enabled by a Large Load Tariff or Large Load Power Rate Plan

DISCUSSION

1. ***Evergy's 2026 IRP Update Puts Kansas City at Risk of Violating National Ambient Air Quality Standards.***

From 2023 through 2025, ozone levels at all Kansas City region air monitoring stages have exceeded EPA's National Ambient Air Quality Standard of 70ppb. [1] This puts Kansas City at risk of being designated a nonattainment area under the Clean Air Act. Retiring Hawthorn, emissions from which contribute to ground level ozone, would likely bring the region into compliance.

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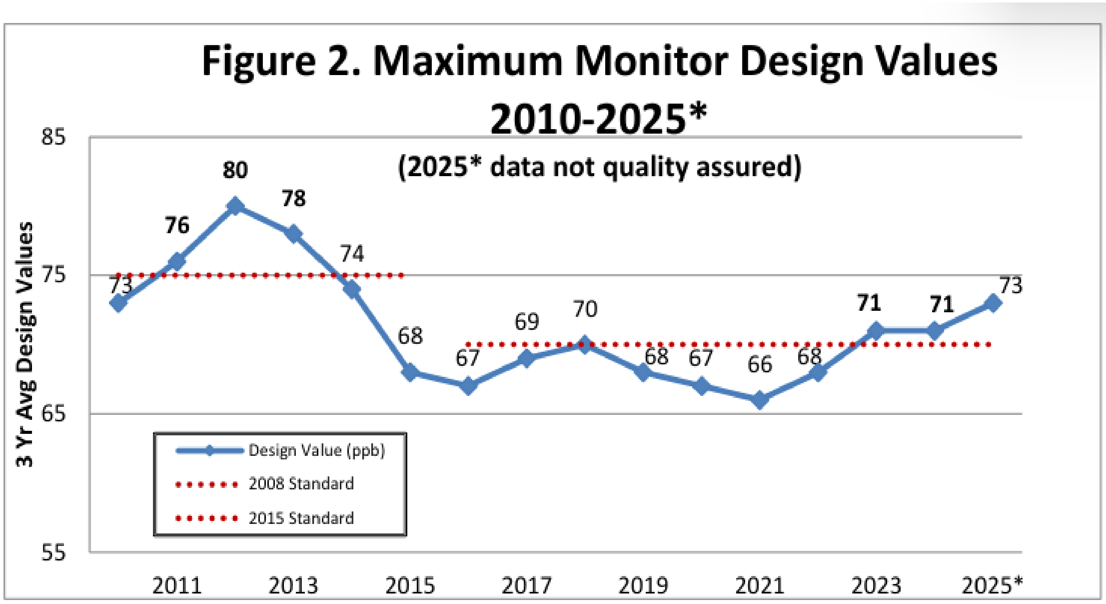
[1] Data obtained from the Mid-America Regional Council ("MARC"): https://www.marc.org/document/2025-ozone-season-summary-0



2. ***Evergy's 2026 IRP Update Does Not Align with the Kansas City Community's Goals.***

The City has, since it passed its first climate plan in 2008, publicly stated its desire to have its homes and buildings powered by clean energy sources and phase out electricity generation that pollutes air and water. The 2022 Climate Protection Resiliency Plan sets new, clear targets to protect the health and wellbeing of the community and transition to affordable, renewable energy.

Evergy, as a monopoly, has an obligation to make a good faith, transparent, collaborative attempt to consider the goals of the communities they serve, who have no other choice for their energy supplier. Evergy has not fulfilled that obligation in this IRP. Instead of listening to stakeholders like Kansas City and accelerating the transition to clean energy, especially the retirement of the Hawthorn coal plant, Evergy sets no date for retiring Hawthorn and plans to slow the transition to clean energy sources. The 2026 Evergy IRP update is in direct opposition to what the citizens of Kansas City have been asking for since 2008.

3. ***Evergy's 2026 IRP Update Does Not Model Health Impacts and Costs.***

Despite existing EPA regulations, burning coal still has significant health impacts to communities both near and downwind from coal plants. Evergy should model the health care costs of all communities impacted by burning coal at its power plants, similarly to how DTE stakeholders modeled it in the example below.[2]

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Table 4: Cumulative national public health impacts of DTE's coal power plants. Values are in instances or dollars per year. Estimates are from COBRA using a 3% discount rate for the monetized health impacts. Emissions used in the model are from Witness Marietta's work papers (BJM-1) (Portfolio #2).

	Belle River Units 1 & 2 2023-2026 Coal	**Monroe Units 3 & 4 2023-2028 Coal**	**Monroe Units 1 & 2 2023-2035 Coal**	**Monroe Units 1 & 2 2031-2035 Coal**
Total Health Costs	$2.51 billion - $5.66 billion	$804 million -$1.81 billion	$2.09 billion -$4.71 billion	$777 million -$1.75 billion
Mortalities	225-510	71-162	184-416	68-154
Upper Respiratory Symptoms	4,535	1,505	3,885	1,437
Asthma Exacerbation	4,738	1,544	3,951	1,453
Work Loss Days	23,270	7,232	18,276	6,666

4. ***Evergy's 2026 IRP Update Overestimates Costs of Renewables and Battery Storage.***

The City remains concerned that continued reliance on combustion resources imposes significant public-health costs on our residents, including increased exposure to pollution from coal and gas units, which Evergy proposes to defer by five or more years in its 2026 IRP Update. Evergy claims that, among other things, rising costs and unfavorable economics justify selecting

[2] Testimony for health costs of DTE IRP: https://mi-psc.force.com/sfc/servlet.shepherd/version/download/0688y00000789Y1AAI

fewer new renewable projects and the City questions whether Evergy may be overestimating renewable and battery costs, which may distort the analysis against cleaner options.

5. ***Evergy's 2026 IRP Update Does Not Include Existing and Planned Commercial Solar as a Resource.***

Evergy, in its 2026 IRP, should model all the commercial solar and storage energy that is already built or planned as a resource, including commercial installations like Panasonic or Google.

6. ***Does Not Include Distributed Energy Resources, Including but not Limited to Demand-Side Management, Energy Efficiency, and Battery Storage, as enabled by a Large Load Tariff or Large Load Power Rate Plan.***

Clean Energy Choice Rider will enable Large Load Customer Service and Large Primary Service rate customers to support the procurement of clean energy resources and/or replacement of identified existing resources in lieu of or in addition to the Company's Preferred Resource Plan. This shall include, but not be limited to, distributed energy resources such as demand-side management, energy efficiency, and battery storage.[3][4]

CONCLUSION

Among the core objectives of the City is the preservation and improvement of the health, economic well-being and resiliency of its citizens and community. The long-range plans

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[3] PSC Approves Ameren Missouri Large Load Power Rate Plan with Customer Protections https://www.olivettemo.com/DocumentCenter/View/8490/MO-PSC-Large-Load-Power-Rate-Plan?bidId=

[4] *In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of New Modified Tariffs for Service to Large Load Customers*, ET-2025-0184 (Mo. P.S.C. 2026)

proposed by Evergy will have a profound impact on the City's ability to meet these objectives. The City's specific recommendations are as follows:

The City has a rich history of partnering with Evergy on energy programs that benefit Kansas City residents, businesses and local government operations. The City and its residents are directly affected by the reliability, affordability, transparency and environmental performance of Evergy's resource plans. The City looks forward and is committed to continuing to work successfully and collaboratively with Evergy and other stakeholders to enable solutions that will accelerate a more affordable, clean, equitable, resilient and reliable energy system.

Respectfully submitted,

ELLINGER BELL LLC

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