

**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	)	File No. EO-2026-0188
Resource Plan Annual Update Filing	)	

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

**EVERGY MISSOURI METRO AND EVERGY MISSOURI WEST
RESPONSES TO ALLEGED DEFICIENCIES AND CONCERNS**

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively, “Evergy” or the “Company”) and in response to comments filed, respectfully states the following:

BACKGROUND

On May 7, 2026, Evergy submitted its 2026 Integrated Resource Plan (“IRP”) annual update filings. A stakeholder presentation (“workshop”) took place on June 26, 2026. On June 30, 2026, Evergy filed a notice advising the Missouri Public Service Commission (“Commission”) that Evergy was making no changes to the May 7, 2026, Annual Update Reports filed in the above captioned dockets as a result of the discussions at the June 26, 2026, workshop.

On July 29, 2026, the Staff of the Missouri Public Service Commission (“Staff”), Renew Missouri Advocates d/b/a Renew Missouri (“Renew MO”), and Sierra Club submitted comments on Evergy’s 2026 Annual Updates. On July 30, 2026, the City of Kansas City, and the Council

for the New Energy Economics (“NEE”), submitted comments identifying concerns and in some cases alleging certain deficiencies regarding Evergy’s 2026 Annual Updates.¹

**EVERGY RESPONSE TO
ALLEGED DEFICIENCIES AND CONCERNS**

MISSOURI PUBLIC SERVICE COMMISSION STAFF

Staff Concern 1: Evergy’s analysis was artificially limited by its own internal constraints.

Response: Evergy did consider additions of “baseload” generation. New Combined-Cycle Gas Turbine (CCGT) resources can operate as intermediate resources but are expected to operate as baseload generation. They are highly efficient (with low heat rates) and can provide reliable, low-cost dispatchable energy. The CCGT resources in the IRP show high expected capacity utilization in the production cost models. Newer CCGTs tend to operate as baseload in US power markets, consistent with US Energy Information Administration reporting that CCGTs built between 2010 and 2022 in the US averaged a 64% capacity factor in 2022 (*See* Natural gas combined-cycle power plants increased utilization with improved technology, November 2023, <https://www.eia.gov/todayinenergy/detail.php?id=60984>.)

The 2026 IRP Update did not evaluate adding new coal-fired resources; however it did consider and select extending the operation of existing coal baseload resources. Retirement planning dates and coal to natural gas conversion/operation dates were postponed relative to the 2025 Preferred Plans.

The 2024 Triennial evaluated Ultra-Supercritical Coal with 90% Carbon Capture and Storage, but it was eliminated as a potential resource option due to cost uncertainty and technological immaturity. Evergy is not aware of any utility-scale coal plants in development or

¹ Evergy Missouri West filed a notice of Revised Resource Plan on 8/31/26 in EO-2026-0189. Evergy’s responses contained herein address the Stakeholder Comments on Evergy’s May 7, 2026, Annual IRP Update filings.

proposed for development in the US. The most recent US coal resource addition began operation in 2013 (Duke Energy Edwardsport Integrated Gasification Combined Cycle in Indiana). New coal resource development is likely to be challenged by environmental regulations and procurement, as most manufacturing capability and technological innovation has focused on natural-gas fired equipment in recent years. If stakeholders believe that Evergy should prioritize exploring new coal resource development, Evergy could gather more information for the Triennial filing.

Other baseload options that were not considered in the IRP Update were nuclear, hydropower, and geothermal. The Triennial IRP reviewed these options and found that geothermal was not suitable to the geography of Evergy's service territory and hydropower challenges included permitting and environmental concerns. Nuclear was expected to have high costs and long lead times (development and permitting timelines were also detailed and expected to be 10+ years in the 2026 IRP Update) but was considered economically viable with a high carbon emissions restriction scenario (or possibly if technological improvements or policy incentives drive cost savings).

In terms of the concern that planning capital limits restrict new additions to ½ CCGTs annually, Evergy Missouri West and Evergy Metro do prefer to limit the resource additions each year of the plan to select or develop the most viable economic projects and moderate rate impacts to customers from adding assets to rate base. Evergy also prioritizes balance sheet stability, which is important to customers because Evergy's credit rating affects its cost of capital, which is used in setting rates to customers. The timing of expected load increases and capacity balance forecasts do not show the need for full CCGTs in this IRP. However, Evergy would consider higher capital spends/larger annual builds if needed to meet customer load and reliability requirements. For the

2025 IRP and CCN filing, Evergy Missouri West added ½ CCGT (McNew) to the Preferred Plan for 2029, the same year as Mullin Creek #1 SCGT.

Staff Concern 2 and Comment on RES Requirement: Evergy’s analysis and preferred plan do not meet the Renewable Energy Standard (“RES”) Requirement in 2036 and 2037. Staff also commented related to the RES Requirement under Various Large Loads as part of its review of Contemporary Issues.

Response: The Evergy utilities are forecasted to have unprecedented load growth over the next few years. The addition of several large load customers drives the increase in renewable energy (or other compliance methods) needed to meet RES Requirements in future years. Past IRPs forecasted that Evergy Missouri West and Evergy Metro would exceed the RES requirements with owned or contracted renewable generation in the 20-year planning horizon. In the 2024 and 2025 IRPs, with lower load forecasts and favorable policy incentives, higher amounts of renewable resource additions were expected to be economically superior to limiting renewable additions to achieve minimal compliance with RES.

As stated in the 2026 IRP, with the updated higher load forecasts and changes to policy incentives, EM and EMW will not be able to meet RES with owned or contracted renewable energy in its Preferred Resource plan by 2036 and 2037. This is 10 years into the future and there are some uncertainties that the Company would like to get better information about before committing to a strategy of meeting the RES need with owned and contracted resources.

There is significant forecast uncertainty as to whether the entire new load will be subject to RES requirements. The Accelerated Renewable Buyer provision §393.1030.2 excludes the load from RES compliance for customers who procure their own renewable energy and retire the renewable energy credits (RECs). EM and EMW expect that their large load customers may use this provision for some or all their load. This would reduce or eliminate the need for EM and/or EMW to procure renewable energy for RES compliance.

Additionally, EM and EMW have the option of purchasing RECs rather than adding resources. Currently REC prices are very low and purchasing RECs would likely be more cost effective than adding resources for their renewable attributes. However, there is no market liquidity for RECs 10 years into the future, so low prices are not guaranteed. REC value will depend on policy incentives and the supply and demand balance with the future resource mix.

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

Response: Evergy continues to have robust conversations with natural gas pipeline companies about the availability of capacity on the natural gas system. Knowledge gained from those conversations, RFPs, etc. inform the assumptions around natural gas pipeline capacity and reservation costs in the IRP.

Staff Concern 4: Evergy’s analysis of battery technology was limited.

Response: Evergy considered potential additions of four-hour lithium-ion batteries in its resource plans. The US EIA recorded less than 1 GW of installed utility-scale battery capacity in 2020, and more than 20 GW by 2024. Most of these systems use lithium-ion batteries, which have become the dominant utility-scale battery technology in the US and global power markets. Two-hour and four-hour duration configurations are the most prevalent installations today and higher duration configurations generally consist of more of the same batteries to achieve the same max output for a longer duration, or the same amount of batteries for a lower max output for a longer duration. Currently, since SPP has few utility-scale batteries in its resource mix, 4-hour duration batteries benefit from high ELCC accreditation because they can contribute to lowering system net-peaks. Six-hour and 8-hour configurations are less likely to be cost-effective because the benefits of ELCC accreditation gains and additional energy market revenue are unlikely to

outweigh the costs of more batteries in the configuration. These tradeoffs may change in the future as the resource mix evolves.

Staff Concern 5: Evergy did not account for potential extension of safe harbor for renewables in any scenario.

Response: Evergy has to begin development on near-term resource additions to ensure they are operational to serve customer energy needs and resource adequacy requirements. EM and EMW's Preferred Plans reflect the cost effective and viable resource additions with the current policy environment, including tax credit eligibility for new renewables. While individual future projects considered may give opportunities for tax benefits, the near-term July 4, 2026, deadline for a project to start physical work limited the potential pool of projects. The dates chosen in the IRP were a balance of project availability and near-term deadlines. *See also Response to Sierra Club Concern 1 below.*

RENEW MISSOURI

Renew Concern 1: Evergy's load growth forecasts require a more diverse portfolio of resources.

Response: Evergy evaluated wind, solar, storage and natural gas-fired resource options to determine optimal resource additions to meet load growth and resource adequacy needs. Evergy's ELCC estimates over the planning horizon were updated to align with recent SPP study results in the near term and degrade more slowly over time than previously forecast. The IRP workpaper provides data sources and calculations. The 2029 solar and wind accreditation values were matched to the 2029 LOLE study results published in 2025. The battery accreditation was based on the 2024 ELCC study results. Evergy did not align it with the 2029 LOLE study because that study only considered 450 MW of systemwide storage, which Evergy believed to be an underestimate given the storage in its own resource plans. Evergy reduced the degradation (assumed higher future ELCC accreditation) from last year's IRP forecast because it expects a

slower penetration of these resources relative to load growth and addition of thermal resources to the system. ELCC is a dynamic method of accrediting resources and depends on many factors, Evergy will continue to evaluate its forecasts in future IRPs as more data is available.

Renew Concern 2: Solar and battery storage remain critical components of least-cost planning and should be evaluated more thoroughly in future planning years.

Response: Evergy disagrees with using installed solar cost estimates cited in research reports for resource plan modeling. Evergy used RFP results and updated costs from counterparties to estimate costs for near-term solar resource additions in the IRP. For near-term resources, Evergy considers transactable costs to be the most accurate and reliable. When modeling resource additions in future years, the IRP analysis increases the installed costs by inflation and decreases the installed costs to account for expected technological improvement. The technological improvement estimates are derived from the NREL ATB and EIA forecasts. Please see the New Build workpapers included with the IRP filings.

Renew Concern 3: Thermal resource development uncertainty reinforces the value of a diversified portfolio and requires more critical review of future natural gas assets.

Response: Evergy agrees that there are a lot of risks with new resource development. The risks of delays and cost increases extend to all resource types. The EM and EMW resource planning parameters reflect an effort to balance those risks and meet expected customer needs and resource adequacy requirements. New natural gas resources are the only firm dispatchable options available in the next 5-7 years. Other firm dispatchable options have longer lead times and may be cost prohibitive and technologically immature. Rapid demand growth in the US is driving a substantial need for new resources. Utilities are predominantly building new natural gas resources to meet this growth; as RENEW points out there is expected to be a large buildout in SPP. The EM and EMW Preferred Plans pace resource additions to be commercially achievable and viable to meet load growth. EM and EMW development lead time and costs for new natural gas resources

was informed by Evergy’s confidence in being able to secure the materials and resources needed – viable sites, turbines, EPC contractors, transmission equipment and interconnection, and pipeline connections.

Renew Concern 4: Utility-owned, customer-hosted battery storage should be evaluated as a planning resource.

Response: At the time of the 2026 IRP, Evergy did not have enough market information to understand how to best model reasonable scenarios in terms of cost, adoption, and scale of customer hosted utility owned battery storage. We are actively evaluating the market for types of solutions that could be modeled in future IRPs.

While Evergy recently completed a Residential Battery Energy Storage (“RBES”) pilot in MO met the objectives to test out the technology and learn about grid interaction, the ultimate conclusion was to not proceed with continuation or expansion (and hence the IRP evaluation). This recommendation was based on the specific structure of the pilot due to high cost, implementation complexity and vendor uncertainty leading to overall scalability concerns. In the future, Evergy does support evaluating scenarios of customer hosted battery storage as resources either customer owned or utility owned.

SIERRA CLUB

Sierra Club Recommendation 1: Evergy should assume greater tax credit eligibility for new solar and wind projects in line with reasonable industry expectations, including the opportunity to take advantage of credits under “safe harbor” rules.

Response: Evergy revised its planning assumptions relating to production tax credit eligibility for new wind and solar to reflect the change in law under the One Big Beautiful Bill Act (OBBA). The law terminated production tax credits under 45Y for resources beginning construction after July 4, 2026, and placed in service after December 2027. It also imposed restrictions relating to ownership, control, and sourcing from Prohibited Foreign Entities. Evergy

disagrees that there is one industry viewpoint on the potential for “safe harbor,” which relates to whether the IRS rules will recognize a project as beginning construction prior to July 4, 2026, for purposes of 45Y eligibility, if the project is eventually placed in service after December 2027. Sierra Club believes the Evergy IRP should assume that resources in service after 2027 will still be eligible and gives an example in which the Entergy IRP appears to assume 2028-2030 resources will maintain eligibility through safe harbor. EM and EMW did not use a specific date cutoff to determine PTC eligibility for future resources but rather informed the availability of resources likely to qualify for PTC based on viable resource candidates from RFP offers, counterparty discussions and self-development options. While individual future projects considered may give opportunities for tax benefits, the near-term July 4, 2026, deadline for a project to start physical work limited the potential pool of projects. The dates chosen in the IRP were a balance of project availability and near-term deadlines.

Prior to the OBBBA, IRS guidance, issued through notices, established eligibility for 45Y credits. One of two tests – the “Physical Work Test” and the “Five Percent Safe Harbor,” could be used to establish when construction begins. The IRS guidance also required that a project come online within 4 years and maintain continuity of construction by satisfying either the “Continuity Requirement” or the “Continuity Safe Harbor”.

In July 2025, President Trump issued an executive order directing the Secretary of the Treasury to revise the IRS guidance as necessary to strictly enforce of the termination date enacted in the OBBBA for the 45Y credits and limit the safe harbors. (See Executive Order, <https://www.whitehouse.gov/presidential-actions/2025/07/ending-market-distorting-subsidies-for-unreliable-foreign%E2%80%91controlled-energy-sources/>). The IRS issued new guidance in August 2025 which removed the option of the Five Percent Safe Harbor (except for solar resources

under 1.5 MW) and required the Physical Work Test as the sole method for determining the start of construction. The test does not require a minimum spending level but must be “physical work of a significant nature.” (See IRS Notice 2025-42, <https://www.irs.gov/pub/irs-irbs/irb25-36.pdf>). In June 2026, the U.S. District Court for the District of Columbia vacated IRS Notice 2025-42 due to inadequate justification for removing the Five Percent Safe Harbor and remanded it to the agency (https://ecf.dcd.uscourts.gov/cgi-bin/show_public_doc?2025cv4400-50).

Sierra Club Recommendation 2: Evergy should include all contracted new large loads in its base load forecast and create transparent criteria that must be met for other, non-contracted large loads to be included in the Company’s large load forecast.

Response: Evergy believes that its criteria for including large loads in the base forecast is robust and appropriately balances the need to plan for customers further along in development while mitigating the risks of overbuilding for speculative projects. For the 2026 IRPs, the base load forecast included customers that recently commenced electric service from Evergy, have an executed ESA under the LLPS tariff, or have a finalized SPP load addition study (typically Attachment AQ) and expect to have an executed LLPS ESA within the next 3-6 months. The base load forecast for EM included one customer under each of the first and second criteria, accounting for 90% of the large load incorporated, and one customer under the third criteria. For EMW, one customer is online, three customers have executed ESAs, and one customer below 75 MW meets the third criteria.

Evergy does not agree with using probabilities to develop large load forecasts and prefers to use the best available customer information to derive forecasts. Instead of creating a specific high-load forecast, EM and EMW have included multiple contingency plans to understand the future resource needs with different levels of additional customer growth, including the next large customer in their queues.

CITY OF KANSAS CITY

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

Response: Evergy's coal-fired generating units, including Hawthorn Generating Station, continue to operate advanced emission control systems that have been instrumental in maintaining compliance with all National Ambient Air Quality Standards (NAAQS) throughout the Kansas City metropolitan area. Hawthorn Generating Station has the second-lowest NOx emissions rate among coal-fired generating units in Missouri, surpassed only by Evergy's Iatan Generating Station. Furthermore, any future major fossil fuel-fired generating facility would be subject to Prevention of Significant Deterioration (PSD) New Source Review (NSR) permitting requirements. The PSD program is specifically designed to protect air quality by requiring a comprehensive demonstration that a proposed source will not cause or contribute to a violation of any applicable NAAQS prior to construction. As a result, both Evergy's existing emission control technologies and the stringent PSD permitting process for new sources provide robust safeguards for air quality and support continued attainment of all applicable air quality standards in the region.

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

Response : Evergy must balance the needs of all customers, not just the preferences of a specific customer or customer segment. While similar customer goals have been considered and evaluated in previous IRPs, they cannot be the sole basis for resource planning decisions. Consistent with IRP requirements, Evergy's primary objective is to identify the portfolio that minimizes the expected Net Present Value of Revenue Requirements (NPVRR), the standard metric used to evaluate the long-term cost of serving customers, across a wide range of future scenarios while providing the greatest overall benefit to customers.

City of Kansas City Concern 3: Evergy's 2026 IRP Update Does Not Model Health Impacts and Costs.

Response: Evergy does not agree that this is a concern in meeting the requirements outlined in the Chapter 22 IRP rule. As stated previously, Evergy's position is that public health impacts are assessed when environmental regulations are established. Each alternative resource plan considered by the Company is based on resources that comply with environmental regulations. As such, no additional public health assessment is needed to evaluate alternative plans. Similar concerns have been rejected by the Commission in various IRP filings over the past several years. In approving the 2021 Triennial IRP, The Commission stated, "The Commission agrees with Evergy and will not require any further response by the Companies to the concern that Evergy failed to evaluate the public health impacts of its ARPs."²

City of Kansas City Concern 4: Evergy's 2026 IRP Update Overestimates Costs of Renewables and Battery Storage.

Response: Evergy does not agree with the unsupported concern that costs may be overestimated. Costs for solar, wind and storage resources were based on RFP offers, as documented in workpapers provided with the IRPs. The Company also incorporates expected technological improvement and inflation to forecast project costs in future years. Because there has been considerable volatility in costs in the past few years, construction costs were included as a critical uncertain factor in the 2024, 2025 and 2026 IRPs.

City of Kansas City Concern 5: Evergy's 2026 IRP Update Does Not Include Existing and Planned Commercial Solar as a Resource.

Response: The IRP and SPP rules require Evergy to serve its retail and wholesale load with generation it owns or for which it has direct contracts. The Metro IRP modeling did include

² See *Order Approving 2021 Triennial Integrated Resource Plan*, File Nos. EO-2021-0035 and EO-2021-0036 (filed March 9, 2022).

a commercial solar resource for which a direct contract exists. Additionally, unaffiliated commercial behind the meter solar is considered in the load forecast.

City of Kansas City Concern 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.

Response: The 2026 IRP included the currently approved demand side management programs plus continuation of demand response into the future based on currently Commission approved levels. A demand side management potential study to be completed in 2026 will inform additional market opportunities for demand side management solutions to include in future IRPs. The Large Load Power Service tariff includes an optional offering for Demand Response that will expect to be modeled once large load customers determine if they are interested in participating.

NEW ENERGY ECONOMICS

NEE Alleged Deficiency 1: Both preferred resource plans fail to satisfy the Missouri Renewable Energy Standard within the planning horizon (Everbay Metro from 2036; EMW from 2037).

Response: Everbay disagrees that this is a deficiency. Please see response to Staff Concern 2.

NEE Alleged Deficiency 2: No compliance benchmark resource plan minimally complying with the RES was developed.

Response: Everbay disagrees that this is a deficiency. Plans were developed for both EM and EMW, assuming compliance solely through owned and contracted resources for the full load forecast. See EM ARPs ACAK and ACAL described in Section 10.8 of the Everbay Metro Annual Update and EMW ARPs ADAK and ADAL described in Section 10.8 of the Everbay Missouri West Annual Update. Please also see response to Staff Concern 2.

NEE Alleged Deficiency 3: No optimal compliance resource plan was developed.

Response: Evergy disagrees that this is a deficiency. Please see response to Staff Concern

2.

NEE Alleged Deficiency 4: No aggressive renewable energy resource plan was developed; renewables are capped by annual build limits in every ARP.

Response: Evergy disagrees that this is a deficiency. IRP Annual Updates are governed by 22.080(3) which does not require the utility to exhaust every Triennial requirement, but rather states “The depth and detail of the annual update report shall generally be commensurate with the magnitude and significance of the changing conditions since the last filed triennial compliance filing or annual update filing.”

NEE Alleged Deficiency 5: No aggressive demand-side resource plan was developed; no ARP tests DSM above the approved MEEIA Cycle 4 portfolio.

Response: Evergy disagrees that this is a deficiency. IRP Annual Updates are governed by 22.080(3) which does not require the utility to exhaust every Triennial requirement, but rather states “[t]he depth and detail of the annual update report shall generally be commensurate with the magnitude and significance of the changing conditions since the last filed triennial compliance filing or annual update filing.”

NEE Alleged Deficiency 6: The capacity expansion model was not calibrated to the RES, a legal mandate.

Response: Evergy disagrees that this is a deficiency. Please see response to Staff Concern

2.

NEE Alleged Deficiency 7: The cost of RES compliance is excluded from every NPVRR ranking, including the coal retirement comparison.

Response: Evergy disagrees that this is a deficiency. Please see response to Staff Concern

2.

NEE Alleged Deficiency 8: Contingency resource plans are not evaluated for RES compliance or compliance cost, although each widens the shortfall.

Response: Evergy disagrees that this is a deficiency. Please see response to Staff Concern

2.

NEE Alleged Deficiency 9: The natural gas price forecast is benchmarked to Henry Hub and translated by a scalar that is never quantified; no basis differential is addressed.

Response: Evergy disagrees that this is a deficiency. The scalar is based on the EIA fundamental forecast for Henry Hub and the locational basis differential is applied.

NEE Alleged Deficiency 10: The low and mid natural gas price cases remain anchored to 2023 EIA fundamentals; only the high case was updated.

Response: Evergy disagrees that this is a deficiency. The IRP Annual Update states that 2025 EIA mid and low forecasts were consistent with 2023 forecasts.

NEE Alleged Deficiency 11: Probability weights assigned to the critical uncertain factors are stated without supporting analysis, and determine which plan ranks first.

Response: Evergy disagrees that this is a deficiency. No changes were made from the 2024 Triennial IRPs or 2025 Annual Updates.

NEE Alleged Deficiency 12: The thermal, renewable, and storage cost escalation assumptions are stated with no source, vintage or derivation, and the underlying cost curves are confidential in their entirety.

Response: Evergy disagrees that this is a deficiency. These values and assumptions were provided in workpapers with the IRPs. NEE should contact Evergy regulatory staff if it did not receive workpapers.

NEE Alleged Deficiency 12a: Renewable costs are escalated at roughly one and a half times the rate applied to thermal costs, a relative treatment opposite in direction to published capital costs.

Response: Evergy disagrees that this is a deficiency. See response to Renew Concern 2 for discussion of renewable cost estimates. These values and assumptions were provided in

workpapers with the IRPs. NEE should contact Evergy regulatory staff if it did not receive workpapers.

NEE Alleged Deficiency 13: Binding annual build limits constrain renewable and storage resources in every economic ARP but were relaxed by factors of two to five in the RES compliance plans.

Response: Evergy disagrees that this is a deficiency. The rules do not require that every scenario have the same parameters. The RES compliance scenarios modeled meeting the full load forecast, including the large load customers, incremental renewable energy requirements through owned or contracted resources. The results of these scenarios give an indication of the volume and cost of new resources needed if the large load customers do not elect to become Accelerated Renewable Buyers and/or RECs are not utilized for compliance.

NEE Alleged Deficiency 14: No energy efficiency programs are modeled after MEEIA Cycle 4 ends in 2026; savings decline 94% (Metro) and 98% (EMW) across the horizon.

Response: See above response to the City of KCMO deficiency #6.

NEE Alleged Deficiency 15: The demand-side market potential study is dated 2023 and now supports a fourth planning cycle; no update is identified or scheduled.

Response: See above response to the City of KCMO deficiency #6.

NEE Alleged Deficiency 16: Thermal resource ownership is modeled at 50% and 100% only.

Response: Evergy disagrees that this is a deficiency. Evergy considers reasonable outcomes of shared ownership, reflective at a 50% ownership level or full ownership at a 100% level. Evergy must be compliant with SPP resource adequacy rules. Modeling different ownership structures only pushes Evergy to solve to zero excess capacity under the resource adequacy rules.

This situation presents undue risk to customers as minor changes in SPP accreditation methodology could have Evergy utilities dip below their supply side obligations.

NEE Alleged Deficiency 17: Neither filing identifies or describes the capacity expansion, production cost, or reliability models used.

Response: Evergy disagrees that this is a deficiency. IRP Annual Updates are governed by 22.080(3) which does not require the utility to exhaust every Triennial requirement, but rather states “The depth and detail of the annual update report shall generally be commensurate with the magnitude and significance of the changing conditions since the last filed triennial compliance filing or annual update filing.” Evergy has not made significant changes to its modeling since the Triennial.

NEE Alleged Deficiency 18: No plot of expected annual unserved hours is provided for any alternative resource plan.

Response: Evergy disagrees that this is a deficiency. The primary objective function of the Evergy IRP capacity expansion model is to meet resource adequacy requirements in every planning season over the 20-year horizon. All alternative resource plans provided for EM and EMW to meet or exceed this objective which is calibrated to the expected SPP requirements driven by SPP’s Loss of Load Expectation (LOLE) studies. SPP planning follows the industry standard of 1 day in 10 years LOLE.

NEE Alleged Deficiency 19: Neither filing affirms resource sufficiency under extreme weather conditions nor presents the underlying forecast.

Response: Evergy disagrees that this is a deficiency. All alternative resource plans provided for EM and EMW to meet or exceed expected SPP requirements driven by SPP’s Loss of Load Expectation (LOLE) studies. The LOLE studies use probabilistic modeling to identify outlier conditions when loss of load could occur, using 40+ years of historical weather data and possible resource outages (including cold-temperature-correlated outages). SPP planning follows

the industry standard of 1 day in 10 years LOLE to set resource adequacy requirements. A peak forecast scenario with extreme weather conditions is in load forecasting workpapers "Metro NSI_Peak Monthly_Annual", "MOWest NSI_Peak Monthly_Annual".

NEE Alleged Deficiency 20: The reported coal extension benefit consists principally of deferred new-build capital and deferred retirement cost rather than avoided cost.

Response: Evergy disagrees that this is a deficiency. For coal extensions, Evergy evaluates the going forward cost of continuing to operate existing generators versus the alternative of building new resources. The determination of benefit to customers is based on the plan NPVRR over the 20-year planning horizon. The deferral of capital expenditures and retirement costs are important components to the customer benefit. Additionally, as outlined in Section 13.4 of the IRP, the preferred resource plan eliminates certain new resources altogether and reduces net operation costs through reduced fuel expenses and increased generator revenues.

NEE Alleged Deficiency 21: The majority of reported benefit (75% Metro; 52% EMW) is produced by moving units beyond the twenty-year horizon.

Response: Evergy disagrees that this is a deficiency. The benefits of moving retirements beyond the 20-year horizon are deferring the need for capital investment in new resources, as well as saving the operating costs of new resources, net of revenues. The costs of moving retirements past the 20-year horizon are continuing going forward costs, including capital costs, fixed O&M and fuel costs, net of revenues.

NEE Alleged Deficiency 22: Environmental compliance costs are assumed immaterial on the stated premise that they do not vary with retirement decisions. Under 40 CFR pt 423 the applicable standard turns on whether a unit ceases coal combustion by December 31, 2034; three units previously scheduled to retire before that date now operate past it.

Response: 40 CFR Part 423 establishes limitations with deadlines on various wastewaters generated at steam electric power generating units. Units previously scheduled to retire prior to December 31, 2034, are in compliance with the 40 CFR Part 423 limitations associated with the

cessation of coal combustion deadline. No further action to comply with the limitations are required and therefore extending beyond this date has no material costs.

NEE Alleged Deficiency 23: No reassessment criteria, capital expenditure thresholds, or off-ramps are established for any extended unit.

Response: Evergy disagrees that this is a deficiency. Evergy utilities reassess retirement decisions every year in IRP Triennials and Annual Updates. Evergy updates its coal budget forecast every year for IRP analysis and includes known or expected major capital expenditures. A primary factor that has contributed to uncertainty and changes in optimal retirement dates over the past several years is US environmental policy. Evergy has forecasted large costs (emissions control equipment, conversion from coal to natural gas, reduced capacity factors) for continued operation of coal resources, or large benefits to replacement (carbon free energy benefits, tax incentives) in some years. High load growth and increasing costs and lead time to build new resources are also current drivers that strongly influence the economics of continuing to operate existing coal resources.

NEE Alleged Deficiency 24 (Metro Only): Evergy Metro relies on a Regional Haze development at the Jeffrey Energy Center, in which it holds no ownership interest, to support its retirement changes.

Response: Evergy disagrees that this is a deficiency. The section cited by NEE is titled “Changes in Environmental Policy and Decarbonization Outlook” and provides an overview of developments affecting the planning environment for the Evergy utilities.

NEE Alleged Deficiency 25: Demand response accreditation is discounted for a policy change SPP has not adopted, while new thermal resources are accredited at design specification.

Response: Evergy disagrees that this is a deficiency. All future year accreditation is based on forecasting which is developed using current SPP rules, expected policy changes, historical data, and expectations for the future resource mix. NEE’s analysis of Evergy’s forecasts is

misleading and missing information, perhaps because NEE did not receive or review workpapers. New thermal resource performance-based accreditation (PBA) is calculated based on design specification because that is the expectation based on SPP business practices (See SPP Business Practice 8400 Performance Based Accreditation for Conventional Resources Section 3.8). Future projections for PBA for existing resources were developed using their own historical outage rates (See workpapers filed with the IRP). ELCC for new renewable and solar resources was forecasted by benchmarking to recent SPP studies and assuming slower declines in accreditation due to lower market saturation of these resources in the next 20 years relative to earlier forecasts. (See response to Renew Concern 1 and workpapers). Demand response accreditation was expected to remain at the full tested value but not be netted from load. This is consistent with Evergy's assumptions in the 2024 and 2025 IRPs and reflects Evergy's policy outlook. The practical impact is minimal to either utility's capacity position, 10 MW or less for EMW and 15 MW or less for EM in any planning year.

NEE Alleged Deficiency 26: SPP ELCC degradation curves were adjusted on the basis of an expected resource mix rather than modeled penetration level, without documentation.

Response: Evergy disagrees that this is a deficiency. These values and assumptions were provided in workpapers with the IRPs. NEE should contact Evergy regulatory staff if it did not receive workpapers. *See also* response to Renew Concern 1.

NEE Alleged Deficiency 27: Market purchases are capped at 200 MW per hour from 2030 without justification, constraining the resource that competes most directly with owned thermal capacity.

Response: Evergy disagrees that this is a deficiency. Evergy includes the justification that it is a planning objective to meet customer energy and capacity needs. If NEE is concerned that ARP modeling constrains long-term power purchase agreements (PPAs), Evergy disagrees as it may execute on its resource plan by owning or contracting for future resources. For example, an

identified future solar project could be self-developed, purchased, or contracted with a long-term PPA to meet the energy and capacity profile identified in the Preferred Plan. If NEE is advocating that utility long-term plans include significant amounts of short-term power purchases to avoid adding resources to meet customer needs, Evergy disagrees with planning to expose customers to the economic and reliability risks of overreliance on the market. Resource additions are needed to meet the high load growth forecasted by Evergy utilities and other load-serving entities in SPP. EM and EMW do not expect other utilities or developers without long-term contracts to build excess generation to meet their needs.

NEE Alleged Deficiency 28 (Metro only): Evergy Metro selected a plan ranking \$15 million above the lowest-cost plan on execution and permitting grounds that are not quantified.

Response: Evergy disagrees that this is a deficiency. The IRP rules do not require that every consideration be quantified. Evergy also disagrees that these risks can be simply quantified by applying probabilities and costs. The probabilities and costs are uncertain, and EM will need to replace any shortfall in capacity with less lead time and likely different options and costs.

NEE Alleged Deficiency 29: Neither filing provides the names, titles, and roles of the preferred resource plan decision makers.

Response: Evergy disagrees that this is a deficiency. This is not a Triennial filing. Annual update requirements in 20 CSR 4240-22.080(3) are explicitly different than Triennial filing requirements. 20 CSR 4240-22.070(1) is not a requirement for an annual update. The decision-making process was explained in the 2024 Triennial including development of forecasts by subject matter experts and review and approval by the Executive team. The Triennial was also certified by CEO David Campbell and VP Development Jason Humphrey.

NEE Alleged Deficiency 30: Battery storage is evaluated at a single four-hour duration; EMW models no storage in its preferred plan.

Response: Evergy disagrees that this is a deficiency. *See* response to Staff Concern 4.

NEE Alleged Deficiency 31: Neither filing discloses the annual gas consumption or fuel cost of the approximately 3,600 MW of new gas-fired capacity in the preferred plans.

Response: Evergy disagrees that this is a deficiency. The production cost modeling used in the IRP analysis calculates these values. NEE can ask for this data in a data request if desired.

NEE Concern 1: The aggregate mid-case load forecast is designated confidential in its entirety, so the forecast underlying both plans cannot be reviewed publicly.

Response: Evergy does not understand this concern. There are several figures included in the IRP which are not marked confidential and clearly show the forecast peaks and energy. Evergy has checked the Confidential and Public versions sent to stakeholders and all versions have axis labels on each figure.

NEE Concern 2: Gross Load Factor is not reported.

Response: Evergy believes this can be calculated, if desired, using information provided in the IRP and workpapers.

NEE Concern 3: The public form of the capacity balance spreadsheet was not filed for the preferred plan or any candidate plan.

Response: The plan workbooks filed in the workpapers contain summer and winter capacity balances.

NEE Concern 4: The surplus interconnection storage analysis referenced in both filings was not provided.

Response: As discussed in the IRPs, Evergy is considering surplus storage to meet the storage needs identified in the IRP Preferred Plans.

NEE Concern 5: The large-load customer pipeline is reported only as a static table in the special contemporary issues section.

Response: This concern relates to a recommendation that was not adopted.

NEE Concern 6: Flexibility available under the Large-Load Power Service tariff is not reflected in the load forecast or capacity expansion analysis.

Response: The load forecast is based on actual or expected customer agreements.

NEE Concern 7: Both filings cite Missouri Senate Bill 4 in support of firm dispatchable additions without analysis of what the statute requires.

Response: The filings cite the passage of Missouri Senate Bill 4, which was a new development since the 2025 IRP filings. The reference was intended to provide context to changes in the planning environment, not to be the primary support for the preferred plan selection.

NEE Concern 8: Several internal inconsistencies appear in the filings, including transposed figure captions, a coal unit listed with two different retirement dates, inconsistent plan compositions, and pipeline totals that do not sum.

Response: It appears that several items identified as inconsistent are actually consistent when the context of the sentences is understood.

WHEREFORE, the Company submits this response, as detailed above.

Respectfully submitted,

/s/ Roger W. Steiner

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**ATTORNEYS FOR EVERGY MISSOURI
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WEST**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 18th day of September 2026.

Roger W. Steiner_____

Roger W. Steiner