

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

In the Matter of Evergy West, Inc. d/b/a)
Evergy Missouri West’s 2026 Integrated)
Resource Plan Annual Update Filing)

Case No. EO-2026-0189

**STAFF’S MEMORANDUM IN RESPONSE TO EVERGY MISSOURI WEST’S NOTICE
OF REVISED RESOURCE PLAN**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through undersigned counsel, and for its *Memorandum in Response to Evergy Missouri West’s Notice of Revised Resource Plan* respectfully states as follows:

1. On August 31, 2026, Evergy West, Inc., d/b/a Evergy Missouri West (“EMW”) filed its *Notice of Revised Resource Plan* (the “2026 RRP”).
2. The 2026 RRP Report states that EMW’s resource plan or acquisition strategy has become materially inconsistent with the Preferred Plan that was filed in the 2026 Annual Update and is no longer appropriate and should be revised.
3. The 2026 RRP Report further states a higher load forecast requires EMW to alter its near-term resource plan and acquisition strategy.
4. In the Staff memorandum, attached and incorporated herein as Appendix A, Staff provides comments on certain concerns it has in response to the above-mentioned key changes EMW has identified in the planning environment.

WHEREFORE, Staff respectfully submits its *Memorandum in Response to Evergy Missouri West’s Notice of Revised Resource Plan* for the Commission’s consideration and

for such other and further relief as the Commission considers just and reasonable under the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr

Missouri Bar Number 45718

Senior Staff Counsel

Missouri Public Service Commission

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Attorney for Staff of the

Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all parties and/or counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 5th day of October, 2026.

/s/ Carolyn H. Kerr

MEMORANDUM

TO: Missouri Public Service Commission Office Case File
Case No. EO-2026-0189
In the Matter of Evergy West, Inc. d/b/a Evergy Missouri West's
2026 Integrated Resource Plan Annual Update Filing

FROM: Matthew W. Lucas, Senior Project Manager
Michael L. Stahlman, Senior Economist
Trevor Gonzales, Senior Research Analyst
Obianuju S. Ezenwanne, Economist
Energy Planning Department

/s/ Nicole Weidenbenner 10-05-2026
Regulatory Compliance Manager / Date

SUBJECT: Staff's Notice of Deficiencies and Concerns On Evergy Missouri West's Notice
of Revised Resource Plan

DATE: October 5, 2026

Background

On August 31, 2026, Evergy Missouri West (EMW) filed *Evergy Missouri West's Notice of Revised Resource Plan* concurrently with direct testimony in its active Certificate of Convenience and Necessity case¹ seeking the construction of a 710 MW combined cycle natural gas generator and a 109 MW battery storage facility. The revised resource plan changes the preferred plan EMW submitted on May 7, 2026, as part of the 2026 Annual Update. The 2026 Annual Update is the second annual update following Evergy's 2024 Triennial Integrated Resource Plan.² Evergy's preferred resource plan (PRP) changed in the 2025 Annual Update, the 2026 Annual Update, and the August 31, 2026, revised resource plan.

Staff's Review

EMW states it filed the revised PRP pursuant to 20 CSR 4240-22.080(12). The revised PRP is not identified as a contingency plan pursuant to 20 CSR 4240-22.080(4), therefore the provisions of 20 CSR 4240-22.080(12)(B) apply, which states:

If the utility decides to implement a resource plan not identified pursuant to 4 CSR 240-22.070(4) or changes its acquisition strategy, it shall give a detailed description of the revised resource plan or acquisition strategy and why none of

¹ Case No. EA-2026-0343.

² Case No. EO-2024-0154.

the contingency resource plans identified in 4 CSR 240 22.070(4) were chosen. In this filing, the utility shall specify the ranges or combinations of outcomes for the critical uncertain factors that define the limits within which the new alternative resource plan remains appropriate.

EMW's new preferred resource plan, "IDAA" was not previously identified in the 2024 Triennial IRP³ filing, or in any of the subsequent annual updates. The 2026 Annual Update, Table 30, identifies EMW's load contingencies:

Table 30: Contingency Plan Descriptions

Plan Name	Description
ADAA	Base Load
BDAA	Large Customer Upsize
CDAA	Additional 500 MW Load
DDAA	Additional 750 MW Load
EDAA	Additional 1,000 MW Load
FDAA	Additional 1,500 MW Load
GDAA	High Electrification Load
HDAA	Low Load

Staff notes that while the 2026 Annual Update identifies contingencies, neither EMW's report nor workpapers provide any analysis of those contingencies, such as the results of a capacity expansion model, or include the Net Present Value Revenue Requirements (NPVRR) associated with each contingency.

Deficiency #1: EMW did not provide a detailed description of why none of the contingency resource plans identified in 4 CSR 4240-22.070(4) were chosen.

Deficiency #2: EMW did not specify the ranges or combinations of outcomes for the critical uncertain factors that define the limits within which the new alternative resource plan remains appropriate.

In addition to those two deficiencies, Staff has the following concerns:

Concern #1: EMW did not review any other Alternative Resource Plans (ARPs) other than IDAA.

Staff's understanding of this filing, based on the Revised Preferred Plan narrative and discussions with EMW, is that EMW only reviewed the capacity expansion model result of the previous preferred plan with additional load. No additional analysis was

³ Integrated Resource Plan (IRP).

undertaken to consider risk or other factors, therefore Staff cannot affirm that the proposed preferred resource plan has the lowest NPVRR of the various ARPs identified in prior EMW IRP filings.

This is particularly concerning, since the 2026 Annual Update plan ADCA is an ARP that forced a battery storage system in 2029. This plan is nearly identical to the new PRP provided in this filing through 2038, with the main difference being the size of the battery addition and an additional 75 MW of load. While ADCA performed fairly well in the Annual Update analysis, there were plans that performed consistently better. This suggests that a more robust analysis may have given a less expensive result.

Concern #2 The changed PRP does not appear to have been constructed following best IRP practices.

While Staff applauds pro-active resource planning, the coincidental filing of the change in preferred resource plan simultaneously with a Certificate of Convenience and Necessity (CCN) application that matches the new preferred resource plan raises suspicion that the PRP was chosen to match EMW's already planned resource additions, rather than the other way around. As the Commission is well aware, the acquisition of new resources takes time, and the current IRP rules are designed to inform the acquisition strategy.

Concern #3: Staff continues to have the concerns identified in the comments filed on July 29, 2026, in this docket.

In particular, Staff notes that in the most recent CCN filing, EA-2026-0343, Evergy proposes to construct two Combined Cycle generators in EMW's service territory, but limits EMW's capacity to only one quarter of the total proposed capacity. EMW does not provide sufficient analysis in its Annual IRP Update or in "Evergy Missouri West's Response to Alleged Deficiencies and Concerns" justifying limiting capacity increases to half of a combined cycle generator.

Conclusion

Evergy Missouri West's Notice of Revised Resource Plan filed on August 31, 2026, does not comply with the requirements of 20 CSR 4240-22.080(12)(B). Staff continues to have concerns with EMW's IRP processes initially discussed the Staff's Comments filed on July 29, 2026, in this docket. For the reasons stated above, Staff continues to recommend that the Commission not rely on the updated preferred plan's analysis to justify any CCN applications.

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

AFFIDAVIT OF OBIANUJU S. EZENWANNE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW, OBIANUJU S. EZENWANNE, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

OBIANUJU S. EZENWANNE

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 2nd day of October 2026.



Notary Public

**BEFORE THE PUBLIC SERVICE COMMISSION
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Missouri West's 2026 Integrated Resource) **Case No. EO-2026-0189**
Plan Annual Update Filing)

AFFIDAVIT OF TREVOR GONZALES

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW, TREVOR GONZALES, and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

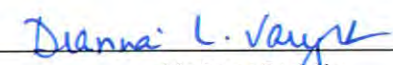
Further the Affiant sayeth not.



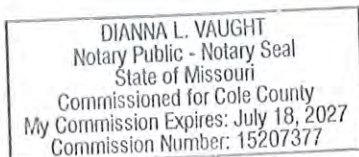
TREVOR GONZALES

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 5th day of October 2026.



Notary Public



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Plan Annual Update Filing)

AFFIDAVIT OF MATTHEW W. LUCAS

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW, MATTHEW W. LUCAS, and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

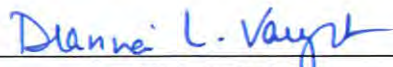
Further the Affiant sayeth not.



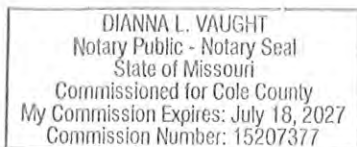
MATTHEW W. LUCAS

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 1st day of October 2026.



Notary Public



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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 attached *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

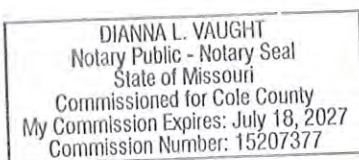
Further the Affiant sayeth not.

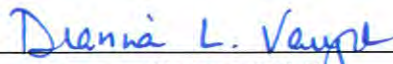


MICHAEL L. STAHLMAN

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 1st day of October 2026.





Notary Public