BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

EVERGY MISSOURI WEST'S REPLY TO STAFF MEMORANDUM
IN RESPONSE TO NOTICE OF REVISED RESOURCE PLAN

COMES NOW, Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West," "EMW" or "Company") and for its *Reply to Staff's Memorandum in Response to Evergy Missouri West's Notice of Revised Resource Plan* ("Reply"), states as follows:

BACKGROUND

On May 7, 2026, Evergy Missouri West, together with Evergy Metro, Inc. (collectively "Evergy" or "Companies"), submitted their 2026 Integrated Resource Plan ("IRP") Annual Updates.[1] Ater a stakeholder presentation ("workshop") took place on June 26, 2026, Evergy filed a notice on June 30, 2026, advising the Missouri Public Service Commission ("Commission") that the Companies were making no changes to the 2026 IRP Annual Updates as a result of the workshop discussions.

On July 29, 2026, the Staff of the Commission ("Staff"), Renew Missouri Advocates ("Renew Missouri"), and Sierra Club submitted comments on Evergy's 2026 IRP Annual Updates, as did the Council for the New Energy Economics and the City of Kansas City on July 30, 2026. Evergy filed its response to those comments on September 18.

Pertinent to this Reply, Evergy Missouri West filed a Notice of Revised Resource Plan on August 31, 2026, given that its resource plan or acquisition strategy had become materially

[1] The 2026 Annual IRP Update of Evergy Metro, Inc. was filed in No. EA-2026-0188.

inconsistent with the Preferred Plan that was filed in the 2026 Annual Update. Over a month later on October 5, 2026, Staff filed a Memorandum in Response to the Company's Notice of Revised Resource Plan.

EVERGY MISSOURI WEST'S REPLY TO STAFF'S MEMORANDUM REGARDING ALLEGED DEFICIENCIES AND CONCERNS

Staff's Alleged 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.

Response: Evergy Missouri West disagrees that there is a deficiency, given the change in the load forecast which prompted the need for an additional near-term resource addition. EMW contracted an amended load forecast for a large-load customer with an energy service agreement ("ESA") after the Company filed its 2026 IRP Annual Update on May 7. As stated in EMW's August 2026 Revised Resource Plan, the ESA increased the Company's peak load forecast by 75 megawatts ("MW") beginning in the winter of 2028-2029.

EMW had identified alternative resource plans for five additional large-load scenarios in its 2026 IRP Annual Update. These plans were developed in response to increases in the peak load forecasts ranging from 500 MW to 1.5 GW in the 2032-2035 time horizon. The Company did not select any of these alternative resource plans to meet the 75 MW peak load increase because the size and timing of this increase did not correlate with any of the five alternative resource plans described in the May 31, 2026, IRP Annual Update. Instead, EMW applied the 2026 IRP Annual Update's criteria to a load forecast that correlated to the 75 MW increase. This led to the selection of the Revised Resource Plan (identified as Plan IDAA) that was filed with the Commission on August 31, 2026.

Staff's Alleged 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.

Response: Evergy Missouri West disagrees that there is a deficiency because no other changes were made to the modeling inputs and assumptions in the 2026 IRP Annual Update except for the 75 MW load increase that is forecast for the winter of 2028-2029. EMW did not otherwise change its forecast or outlook for critical uncertain factors to develop the Revised Resource Plan.

As stated in Sections 2.2 and 2.3 of its Revised Resource Plan, other than the load forecast update, no changes were made to any inputs or assumptions. The ranges or combinations of outcomes for the critical uncertain factors remain the same as they were in the May 7, 2026, IRP Annual Update.

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

Response: Evergy Missouri West's 2026 Annual Update filed on May 7 included extensive forecast updates, discussion of planning considerations, comparison of alternative resource plans, and scenario analysis. The August 31, 2026, Revised Resource Plan is an extension of that analysis for the singular 75 MW change in the load forecast which prompted the need for an additional near-term resource addition.

EMW's August 2026 Revised Resource Plan represents the most viable and cost-effective solution to address the 75 MW additional load, based on the timing of the customer's incremental needs, the Company's required portfolio contribution to meet its resource adequacy needs, and the availability and feasibility of new generation projects.

Staff Concern 2: The changed Preferred Resource Plan (PRP) does not appear to have been constructed following best IRP practices.

Response: Evergy Missouri West identified the need for an additional near-term resource to meet the clear and imminent customer needs based on the Company's expected peak load

growth, resource adequacy needs, and Southwest Power Pool's planning reserve margin requirements. In anticipation that this incremental peak load will require service by the winter of 2028-2029, the Revised Preferred Plan includes an additional storage resource by Summer 2029. EMW included a 2029 storage resource known as the Foxtrot battery energy storage system ("BESS") in its certificate of convenience and necessity ("CCN") application in Case No. EA-2026-0343, filed on August 31, 2026. If approved by the Commission, this BESS project will achieve its commercial operation date in time to meet the increased peak load.

Today the economic forces of supply and demand are pressuring electric utilities, including Evergy, to add capacity resources to meet customer load growth, while they manage the construction of those resources which necessarily requires significant lead time. Supply chain constraints, tariffs, rising inflation, as well as local landowner concerns all contribute to uncertainty around the costs and viability of energy infrastructure projects across the country. In this complex and challenging planning environment, Evergy has found that traditional timelines for preparing and filing IRP Triennial Plans and annual updates are not always compatible with the need to conduct a multi-step procurement and construction process that results in new resources being available on time and on budget.

As a result, Evergy has adapted its development planning process to reduce lead time and to avoid disconnects between planning and execution. Evergy maintains a short list of resource options from its request for proposal ("RFP") results. It continuously gathers information from developers and suppliers to assess the availability and timing of new generation projects. The feasibility of viable projects informs the options analyzed in the IRP process, just as the resource types selected through the IRP analysis informs the selection of a project. Consistent with this

process and the Commission's IRP Rules, Evergy Missouri West filed its Notice of Revised Resource Plan, attaching the Revised Resource Plan as Exhibit A, on August 31, 2026.

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

Response: Staff's statement regarding its "concerns" fails to note any specific concern related to Evergy Missouri West. Evergy previously addressed these concerns in its September 18, 2026, Response to Alleged Deficiencies and Concerns.

With regard to Concern #4 in Staff's July 2026 Comments regarding battery technology, Evergy Missouri West now seeks a CCN from the Commission to construct and operate the approximately 109 MW Foxtrot BESS Project that will be collocated with the Foxtrot solar project in Jasper County, Missouri. The CCN Application was filed in No. EA-2026-0343 on August 31, 2026.

Moreover, as the Commission knows, Evergy Missouri Metro recently entered into a Non-Unanimous Stipulation and Agreement ("Agreement") with Staff, Midwest Energy Consumers Group, and Renew Missouri in No. EA-2026-0154 which contained a provision related to battery systems.[2] In Paragraph 9 of the Agreement Evergy stated that it "shall consider alternative battery configurations such as a 6- or 8-hour type in future IRP analysis until Evergy files its first IRP pursuant to Section 393.1900 RSMo."[3] Evergy also committed "to developing, within the next 12 months, a plan identifying potential opportunities for additional customer-sited non-thermal capacity resources."[4]

[2] See Non-Unanimous Stipulation and Agreement ("Stipulation"), In re Evergy Metro, Inc. CCN Applic. to Construct a Nat. Gas Elec. Production Facility, No. EA-2026-0154 (Oct. 2, 2026).
[3] Id., § 9 at 4.
[4] Id.

In addition, the Agreement also includes a condition that is responsive to Staff's Concern #1 that Evergy's analysis was artificially limited by its own internal constraints. Paragraph 22 of the Agreement states: "Future IRP analysis until EMM files its first IRP pursuant to Section 393.1900 should not constrain the model to build ½ CC per year."

WHEREFORE, the Company submits this Reply to Staff's Memorandum in Response to the Company's Notice of Revised Resource Plan.

Respectfully submitted,

/s/ Roger W. Steiner

Roger W. Steiner, MBN 39586
Cole Bailey, MBN 77268
Corporate Counsel
Evergy, Inc.
1200 Main Street
Kansas City, MO 64105
Phone: (816) 556-2314
roger.steiner@evergy.com
cole.bailey@evergy.com

Karl Zobrist, MBN 28325
Jacqueline M. Whipple, MBN 65270
Chandler Hiatt, MBN 75604
Dentons US LLP
4520 Main Street, Suite 1100
Kansas City MO 64111
Phone: (816) 460-2400
Karl.zobrist@dentons.com
Jacqueline.whipple@dentons.com
Chandler.hiatt@dentons.com

ATTORNEYS FOR EVERGY MISSOURI 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 26th day of October 2026.

Roger W. Steiner

Roger W. Steiner