

KCC Utilities Division Update

Senate Utilities Committee

January 15, 2026

Justin Grady —*Director of Utilities Division*



Agenda

1. Update on Electric Rate Affordability and Regional Competitiveness of Kansas Electric Rates
2. Update on Recent Major KCC Dockets
 - A. 25-EKME-315-TAR (Large Load Power Service)
 - B. 25-EKCE-207-PRE (CCGT and Solar Predetermination)
 - C. 25-EKCE-294-RTS (EKC Rate Case)
3. Recent Developments at SPP
 - A. 2025 Integrated Transmission Plan (ITP)
 - B. Resource Adequacy Updates
4. Current Major KCC Dockets
 - A. 26-EKCE-148-STG (Buffalo Flats to Delaware 345 kV Line Siting)
 - B. 26-EPDE-180-RTS (Empire District Electric Rate Case)

1. Electric Rate Affordability and Rate Competitiveness

Average Electric Rate (Cents/kWh) by State, All Sectors (2016-2025)											Oct. 25 over Full Year 2024 Change	Oct. 25 over Full Year 2016 Change
	2016	2017	2018	2019	2020	2021	2022	2023	2024	Oct. 25 YTD		
U.S. Average	10.27	10.48	10.53	10.54	10.59	11.1	12.36	12.68	12.94	13.66	5.57%	33.01%
Colorado	9.83	9.99	10.02	10.17	10.27	10.9	11.75	11.76	12.07	12.83	6.33%	30.52%
Minnesota	9.99	10.27	10.37	10.33	10.57	11.08	12.04	12.21	12.35	12.77	3.45%	27.86%
Missouri	9.74	10.03	9.93	9.68	9.64	9.85	10.26	10.87	11.06	11.73	6.03%	20.43%
Kansas	10.49	10.6	10.72	10.26	10.38	10.47	11.47	10.80	11.21	11.51	2.69%	9.72%
South Dakota	9.83	10.05	9.97	9.96	10.06	10.43	10.44	10.49	10.87	11.38	4.72%	15.77%
Texas	8.43	8.38	8.48	8.6	8.36	9.14	10.16	10.04	9.79	10.25	4.70%	21.59%
Iowa	8.55	8.73	8.92	9.08	8.97	9.13	9.57	9.42	9.34	9.98	6.86%	16.73%
Arkansas	8.13	8.26	7.78	8.22	8.32	9.1	9.91	9.73	9.59	9.86	2.79%	21.28%
Oklahoma	7.83	8.2	8.09	7.86	7.63	8.52	10.05	9.30	9.09	9.56	5.21%	22.09%
North Dakota	8.94	8.78	8.91	8.85	8.53	8.65	8.42	8.03	7.93	7.97	0.54%	-10.85%
Regional Peer Average	9.03	9.19	9.16	9.19	9.15	9.64	10.29	10.21	10.23	10.70	4.62%	19.84%
KS Vs. Peer Average	16.17%	15.37%	16.99%	11.59%	13.44%	8.56%	11.48%	5.82%	9.56%	7.53%		
KS Vs. US Average	2.14%	1.15%	1.80%	-2.66%	-1.98%	-5.68%	-7.20%	-14.83%	-13.38%	-15.74%		

Source: Table 4 EIA.gov

- At Year End 2024, All-in Electric Rate in Kansas was 15.74% below the National Average but 7.53% above the Regional Average.
- In total, the All-in Electric Rate has grown by 9.72% in Kansas from YE 2016 through YTD October 2025. That compares to 33% for the US Average, and 19.84% for the Regional Average.

1. Electric Rate Affordability and Rate Competitiveness

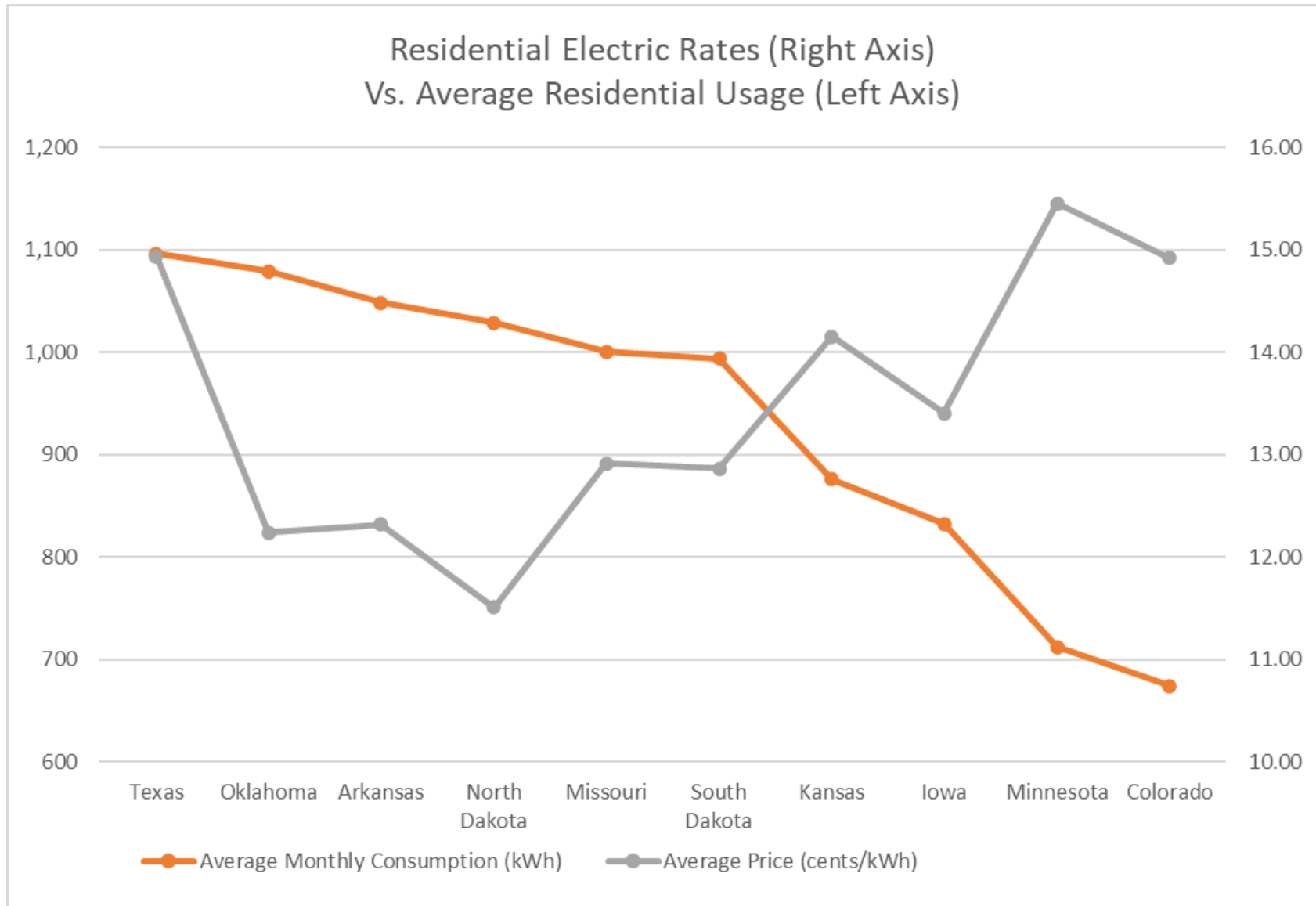
2024 Average Monthly Bill- Residential

(Data from forms EIA-861- schedules 4A-D, EIA-861S and EIA-861U)

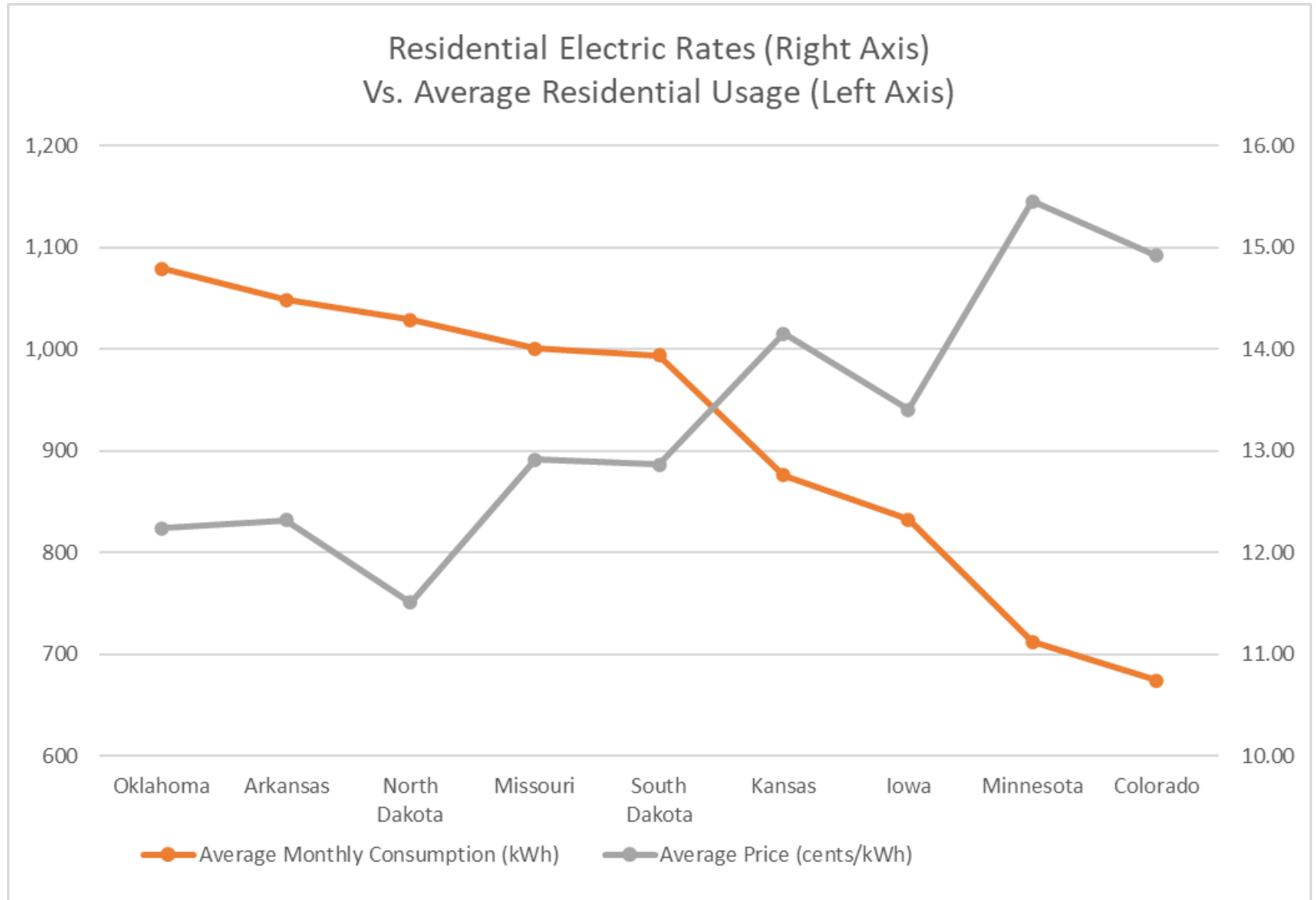
State	Average Monthly Consumption (kWh)	Average Price (cents/kWh)	Average Monthly Bill	Monthly Bill Rank
Texas	1,096	14.94	\$ 163.72	1
Oklahoma	1,079	12.24	\$ 132.05	2
Missouri	1,001	12.91	\$ 129.18	3
Arkansas	1,048	12.32	\$ 129.13	4
South Dakota	994	12.86	\$ 127.81	5
Kansas	876	14.15	\$ 123.90	6
North Dakota	1,029	11.51	\$ 118.38	7
Iowa	832	13.40	\$ 111.54	8
Minnesota	712	15.45	\$ 110.06	9
Colorado	674	14.92	\$ 100.57	10
U.S. Total	863	16.48	\$ 142.26	
Regional Peer Average	941	13.39	\$ 124.72	

- At Year End 2024, the Average Residential Electricity Bill in Kansas was \$.82 less than the Regional Average, and \$18.36 below the National Average.
- Except for Texas, Rates and Monthly Consumption exhibit strong inverse correlation.

1. Electric Rate Affordability and Rate Competitiveness



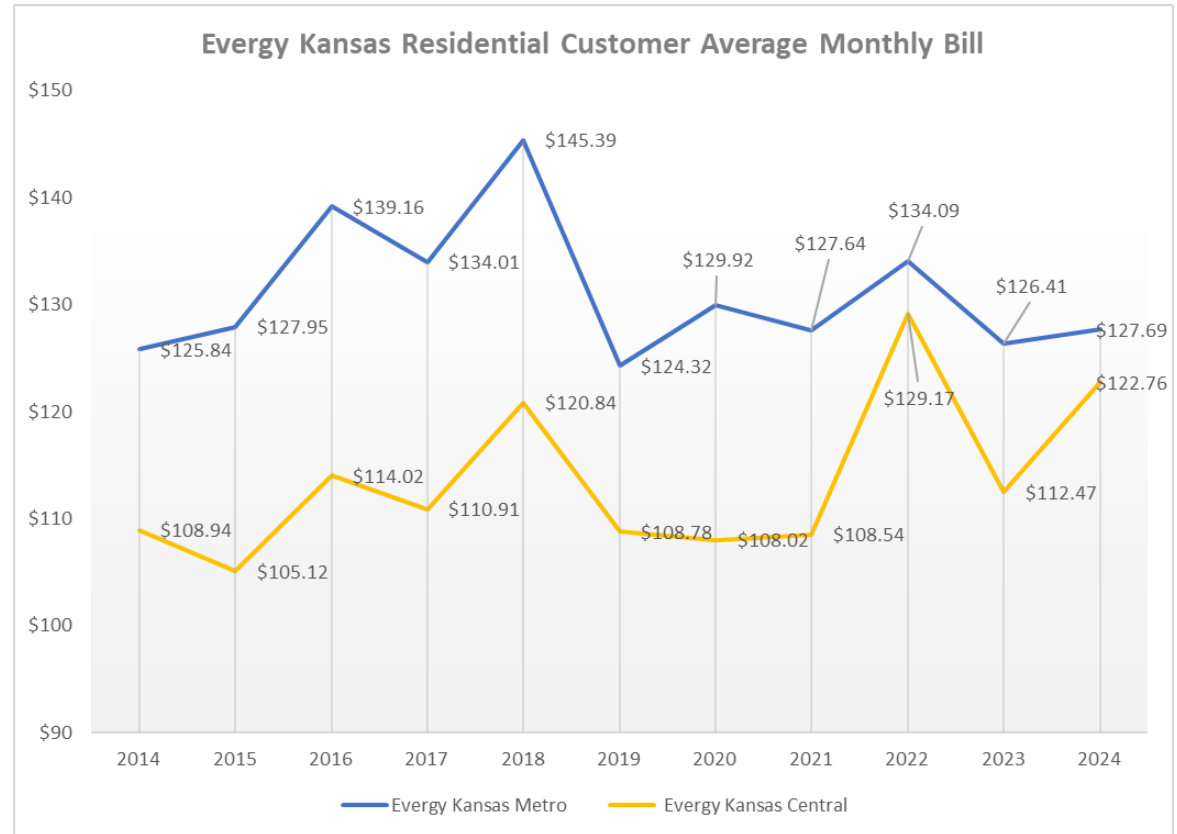
1. Electric Rate Affordability and Rate Competitiveness



1. Electric Rate Affordability and Rate Competitiveness

Residential Customer Average Monthly Bill

Year	Evergy Kansas Metro	Evergy Kansas Central
2014	\$ 125.84	\$ 108.94
2015	\$ 127.95	\$ 105.12
2016	\$ 139.16	\$ 114.02
2017	\$ 134.01	\$ 110.91
2018	\$ 145.39	\$ 120.84
2019	\$ 124.32	\$ 108.78
2020	\$ 129.92	\$ 108.02
2021	\$ 127.64	\$ 108.54
2022	\$ 134.09	\$ 129.17
2023	\$ 126.41	\$ 112.47
2024	\$ 127.69	\$ 122.76
10-YR CAGR	0.15%	1.20%
10-YR Growth	1.47%	12.69%



- As of YE 2024, the average Residential Monthly Bill for EKC customers has increased 12.69% in total over the last 10 years. 1.20% per year.
- As of YE 2024, the average Residential Monthly Bill for EKM customers has increased 1.47% in total over the last 10 years. 0.15% per year.

2a—Update on Recent Major KCC Dockets

1. 25-EKME-315-TAR—Evergy's Large Load Power Service Tariff (LLPS) Docket.
 - A. Filed on February 11, 2025.
 - B. After months of collaboration and settlement discussions, all active parties filed a Unanimous Settlement Agreement on August 18, 2025.
 - C. Evidentiary Hearing held on October 8, 2025.
 - D. Commission approved the Settlement on November 6, 2025.

[Active Link for Staff Testimony in Support](#)

[Active Link for Settlement Agreement](#)

[Active Link for Commission Order Approving Settlement Agreement](#)

2a—Key Customer Protective Elements of the Tariff

1. LLPS Service will apply to any new customer (or customer growth) greater than 75 MW.
 - Possible exceptions apply (i.e., customers locating in Kansas because of a state program established to bring in large capital investments engaged in advanced manufacturing, aerospace, distribution, logistics, professional services, etc.)
 - Also, these customers can get priority access to Evergy's large load queue: Section 2.07B of Evergy's GT&C.

Service related to projects the Company designates as serving the community interest may be ***given priority in the queue and may not be required to submit a deposit.*** Community interest projects are those that are part of a competitive search in which the Company is competing against at least one other location for the project, the Customer reasonably demonstrates that the project will employ at least 250 permanent, full-time employees, and an accredited state or regional economic development organization certifies that the absence of a deposit and expedited timing are critical to the state winning the project. (emphasis added)

2a—Key Customer Protective Elements of the Tariff

2. LLPS customers must take service for contract term length of 12-17 years (12 years base plus optional load ramp up to five years). Evergreen for five-year periods after expiration.

- After first five years, can reduce capacity by smaller of 10% or 25 MW without charge.
- Take or Pay—Regardless of actual usage, the customer owes the Minimum Bill for the calculated using all demand rates (including base demand rates 50% higher than standard ILP rate, all TDC demand rates, CWIP demand rates, etc.) at 80% of Contract Demand.
- Customers seeking to terminate the contract must provide 36-months notice. If less than 36-months notice, each month early counts as 2 months in the termination charge.
- Termination charge for the remaining term of the contract or 12-months, whichever is greater.

2a—Key Customer Protective Elements of the Tariff

3. LLPS customers will pay the RECA (fuel clause), the Energy Efficiency Rider (EER), the Property Tax Surcharge (PTS), the Tax Adjustment Rider (TA), the Transmission Delivery Charge (TDC), Construction Work in Progress (CWIP) rider and the Cost Stabilization Rider (CSR)*.
4. LLPS customers are subject to Creditworthiness Standards and Collateral requirements of up to 2 years of Minimum Bills.

*CSR is a new rider introduced in this Docket to reverse the impact of economic discount rates for LLPS customers.

2a—Key Customer Protective Elements of the Tariff

5. Despite high load factors (efficiency of utilization of infrastructure relative to peak demand on the system), LLPS customers are not getting rate discounts.

Schedule LLPS Initial Monthly Pricing

Schedule LLPS Initial Monthly Pricing - Settlement				
Charges	Kansas Central		Kansas Metro	
	Summer	Winter	Summer	Winter
Customer	\$ 386.67	\$ 386.67	\$ 751.02	\$ 751.02
Grid (\$/kW) (Substation Voltage)	\$ 0.248	\$ 0.248	\$ 0.200	\$ 0.200
Grid (\$/kW) (Transmission Voltage)	\$ 0.156	\$ 0.156	\$ 0.126	\$ 0.126
Demand (\$/kW)	\$ 22.985	\$ 20.817	\$ 21.174	\$ 19.174
Energy (\$/kWh)	\$ 0.00872	\$ 0.00872	\$ 0.01000	\$ 0.01000

- These Demand Rates, while based on existing embedded costs, approximate the incremental capacity cost of building new dispatchable generation (CCGT).
- All-in base rates (Demand and Energy) are 16-19% more than standard industrial customers pay.
- All in rates (total bill view) are 8-10% *higher* than ILP customers pay today.

2a—Optional Riders for LLPS Customers

1. Interim Capacity Adjustment—Allows LLPS customer to pay for interim deliverable capacity to serve while new generation is being built.
2. Customer Capacity Rider—Enables Evergy to credit customers for using their supply of generation capacity as SPP-accredited capacity for use by Evergy to serve the customers' load.
3. Demand Response/Generation Rider—Enables LLPS customers to participate in interruptible DR programs, allowing Evergy to curtail operations for economic or reliability reasons. The LLPS customer gets paid a capacity credit for this service.

2a—Optional Riders for LLPS Customers

4. Clean Energy Choice Rider—Allows LLPS customers to support (pay for) Evergy's procurement of clean energy resources in lieu of or in addition to Evergy's preferred IRP plan.
 - Evergy retains discretion to choose final portfolio parameters, retains its obligations to provide efficient and sufficient (reliable) service.
 - Any arrangement would have to be submitted to the Commission for approval in a predetermination proceeding governed by K.S.A 66-1239.
5. Renewable Energy Program Rider (RENEW)—Expands EKC's program to EKM to allow customers to purchase RECs or renewable energy from Evergy. Revenues go to other customers through RECA credit.

2a—Optional Riders for LLPS Customers

6. Green Solutions Connections Program—provides non-residential customers with an average monthly peak demand of 200 kW the opportunity to subscribe to future renewable energy attributes associated with company owned renewable resources acquired through the IRP. Revenues go to offset fuel charges for other customers.
7. Alternative Energy Credit Rider—provides large customers with the ability to include emission-free nuclear energy from Evergy-owned or purchased nuclear resources into their clean energy portfolios to support the company's sustainability or decarbonization goals. Revenues to offset fuel charges for other customers.

2a—Why Should Evergy Serve Data Centers?

- With the right protections, we think Data Centers can provide real benefit to Kansas electric customers. High Load Factor, Premium Pricing, etc.
- Data Centers also contribute significantly to the tax base, broaden and diversify the Kansas economy, and can bring significant follow-on community benefits.
- There is significant Data Center demand being experienced in the SPP region. Someone will serve these customers. If Kansas is the only state not serving them, our regional rate competitiveness will likely suffer.
- Bottom line, with the customer protections and premium pricing reflected in the LLPS tariff, serving data centers will help customer affordability in Kansas, not hurt it.

2a—Does Evergy Have to Serve Data Centers?

- No. Data Centers can self generate today without the KCC or Evergy's permission. We are not seeing significant interest in truly disconnecting from the power grid. It is just too expensive to replicate the kind of reliability you get from being served from the grid.
- The Bring Your Own Generation (BYOG) elements of the LLPS tariff allow Data Centers to supplement the capacity requirements of Evergy to provide grid-supplied energy, while still maintaining sales tax exemption provided in SB-98.
- SB-98 requires a data center to “commit to purchase electricity for 10 years from the public utility that is certified to provide retail electric service in the territory where the qualified data center is located.”

2a—What Does the LLPS Tariff Not Do?

- This is only applicable to customers in Evergy Kansas Central or Evergy Kansas Metro service territories. It will not apply to Cooperatives, or Municipals, etc.
- This doesn't override any local county or state permits that may be required for Data Centers. It simply sets the ground rules for *electric service*.
- This is not an incentive program for Data Centers, it is ensuring that if Data Centers come to Kansas, existing customers are protected and treated fairly from costs that may be incurred to serve these new customers.

2b—Update on Recent Major KCC Dockets

1. Docket No. 25-EKCE-207-PRE—On November 6, 2024, Evergy filed for Predetermination of the purchase of 50% of two 710 MW Combined Cycle Generating Facilities (CCGTs) and one 159 MW Solar Facility.
 - A. Viola CCGT in Sumner County. \$789 million for EKC’s 50% interest (305 MW)
 - B. McNew CCGT in Reno County. \$800 million for EKC’s 50% interest (305 MW)
 - C. Kansas Sky Solar in Douglas County. \$228 million for EKC’s 100% interest 159 MW AC.
2. Non-Unanimous Settlement Agreement (CCGTs) filed on April 16, 2025.
 - A. Evergy, Staff, KPP, NRDC, Midwest Energy, Johnson County, City of Lawrence, Atmos, HF Sinclair, KMEA, and KGS supported approval of the CCGT Agreement.
3. Unanimous Settlement Agreement for Solar Facility filed on April 16, 2025.
 - A. Evergy, CURB, KPP, Wichita Chamber, CEP, NRDC, the U.S. Department of Defense, KIC and its participating members and aligned interests, USD 259, Midwest Energy, Johnson County, City of Lawrence, Atmos, HF Sinclair, Renew Missouri, CCPS Transportation, Walmart, NEE, KMEA, and KGS supported approval of the Solar Agreement.
4. Evidentiary Hearing held between April 21-23, 2025.
5. Commission approved both Settlement Agreements on July 7, 2025.
 - A. In approving the CCGTs and the Solar facility, the Commission examined the factors established in K.S.A. 66-1239. The Commission found that the resources were consistent with Evergy’s most recent IRP and that the facilities were reasonable, reliable, and efficient.

[Active Link to March 14, 2025, Staff Testimony in 25-207 Docket](#)

[Active Link to July 7, 2025, Order Approving CCGTs and Solar](#)

2c—Update on Recent Major KCC Dockets

1. Docket No. 25-EKCE-294-RTS—On January 31, 2025, Evergy filed its second base rate case in 21 months (after Docket No. 23-EKCE-775-RTS filed on April 21, 2023).
 - A. EKC requested an increase in base rates of \$192 million (8.64% of total retail revenues).
 - B. On July 15, 2025, all active parties filed a Unanimous Settlement Agreement with the Commission requesting a \$128 million increase in base rates. This resulted in an approximate 6.6% increase in residential customer bills, or \$8.47/month.
 - C. Parties supporting the Settlement included:
Evergy; Staff; CURB; HF Sinclair; USD 259; USD 233; Kroger; US DOD; KGS; Black Hills; CVR Refining; Cargill; Occidental; LPC; KARA; KGFA; Renew Kansas; Goodyear; Spirit; APS; USD 232; CCPS; Walmart; the Wichita Chamber; the Kansas Chamber; and IBEW 304.
 - D. Staff calculated that over \$100 million of this increase in rates was directly related to EKC's investment in energy infrastructure to serve Kansas customers with the balance of the rate increase due to general increases in inflation and other cost true-ups.
 - E. [Active Link to Commission Order Approving Settlement Agreement](#)

3a—SPP Update 2025 ITP

1. The Southwest Power Pool (SPP) recently completed its 2025 Integrated Transmission Plan (ITP), which is a transmission plan covering transmission needed over the next 10-years.
2. The final plan can be found here:
<https://www.spp.org/documents/75483/2025%20itp%20report%20v1.0.pdf>

THE BIG PICTURE

- Our grid is already **at its limits**
- SPP members in every state are forecasting industrial **electrification**, manufacturing **onshoring**, and **economic development**
- This growth will drive demand for electricity and requires our grid to expand to keep pace
- The level of growth has spurred a need for ultra-high voltage (765 kV) transmission







Our ultimate goal: provide timely, reliable, and affordable power in all probable conditions.

3a—SPP Update 2025 ITP

1. SPP's original 2025 ITP called for \$18.1 billion in new transmission, primarily consisting of a 765 kV overlay in the Southern Portion of the footprint.

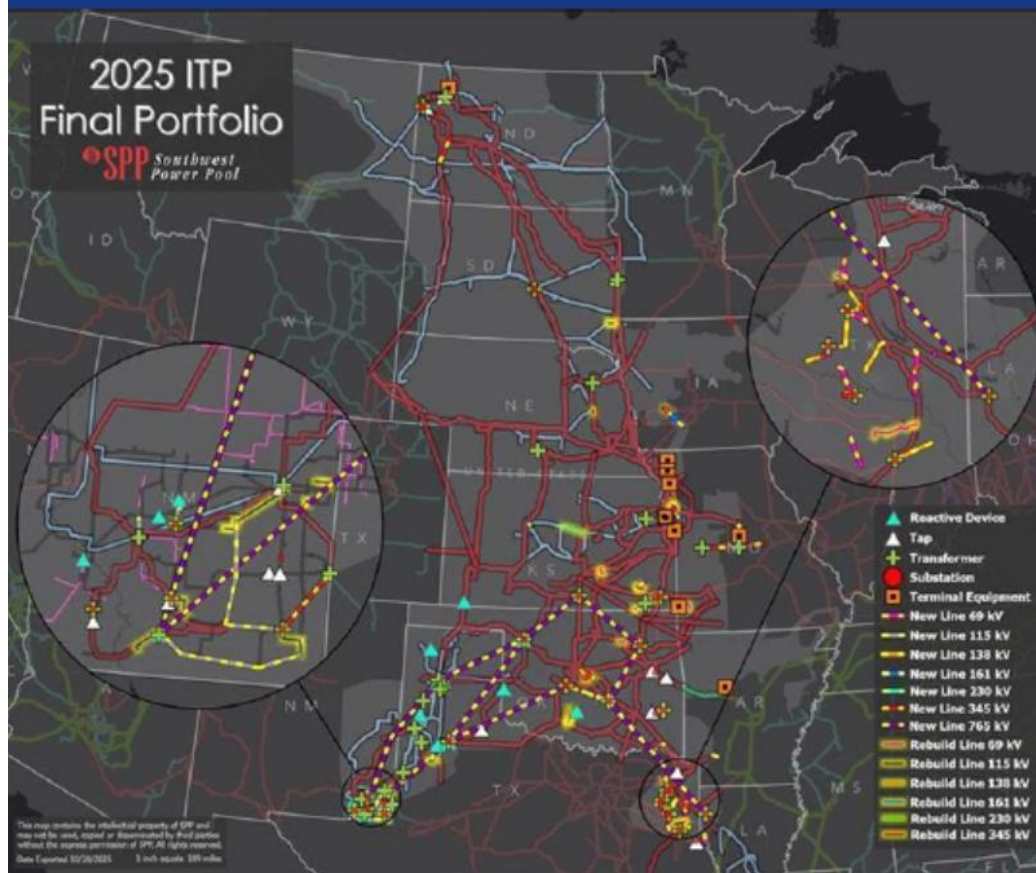
2025 ITP: MEETING THE CHALLENGE

			
Rising Demand	Infrastructure Timing	High Stakes	Economic Development
SPP's 14-state region is facing a projected electricity demand increase of 25% by 2030 .	New lines take, on average, six years to develop, creating a mismatch between readiness and demand.	Delays lead to higher energy costs , reduced reliability , and lost economic opportunities.	ITP projects not only support reliability and lower costs, they also power future growth .

We must balance system needs, growth, and affordability: every decision matters

3a—SPP Update 2025 ITP

2025 ITP TRANSMISSION EXPANSION PLAN



Full 2025 Portfolio Highlights:

- 6:1 to 10:1 B/C range (40 yr)
- \$150-\$250B lower APC (40 yr)
- 2,900+ miles of new HV
 - 1,800+ mi. of 765 kV
 - 450+ mi. of 345 kV
- ~345 miles of rebuilt HV
- 3,000 issues mitigated
- \$19B* total portfolio cost

*Including ~\$1billion in Zonal Planning Criteria (ZPC) projects

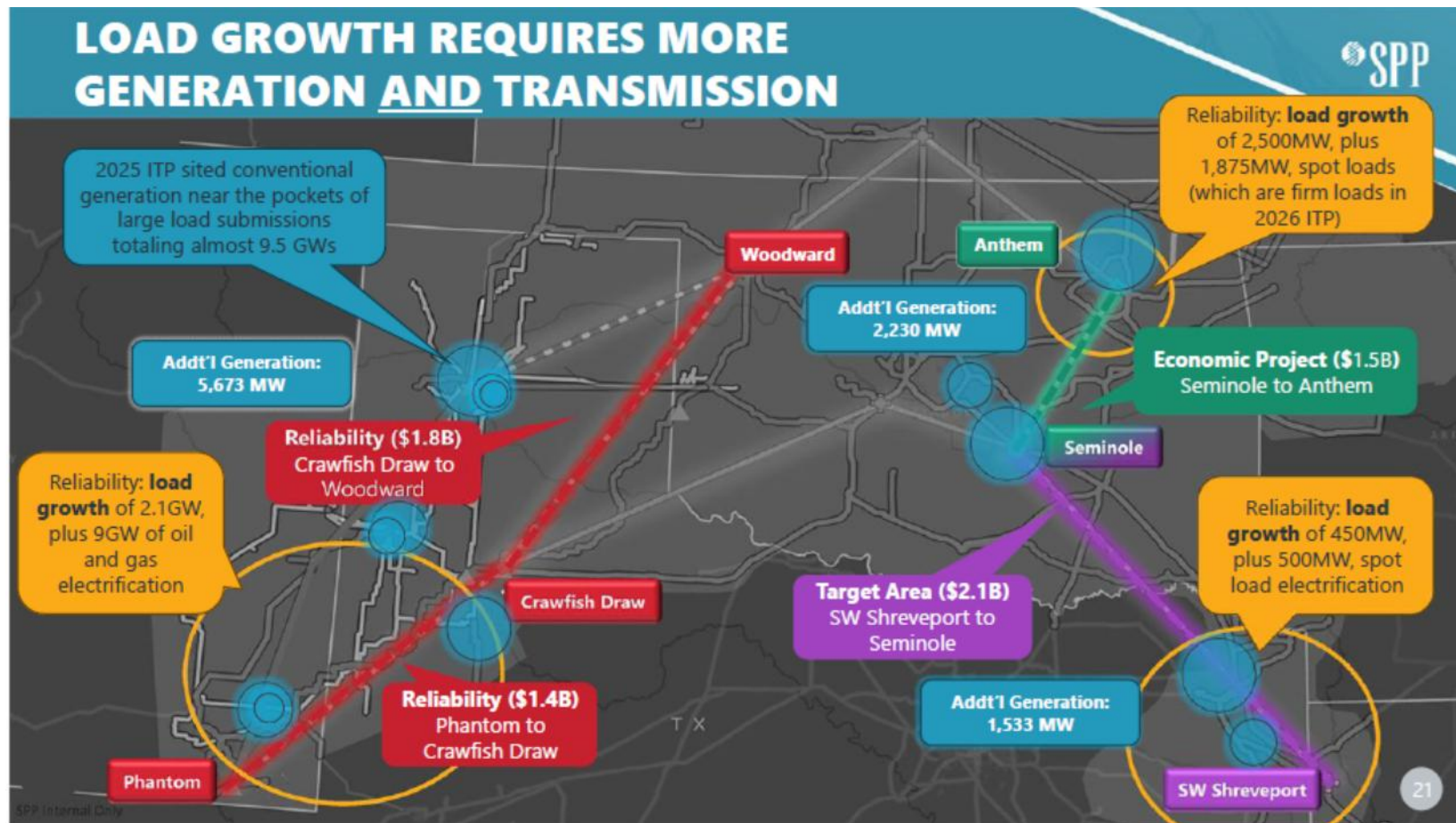
3a—SPP Update 2025 ITP

SPP'S 2025 ITP: BALANCING URGENCY & FLEXIBILITY

2025 ITP Portfolio	Description	Remaining Project Total
Full 2025 ITP Portfolio	All projects identified to meet 10-year reliability and economic needs <i>(Excludes ~\$1B of ZPC project costs)</i>	\$18.1 billion
Staff Refined	Deferred* a mix of projects without near-term needs, or that could be further optimized with 2026 ITP	\$11.1 billion (~\$7B deferred)
ESWG/TWG Endorsed	Endorsed Staff Refined proposal	\$11.1 billion
MOPC Endorsed / Staff Recommendation	Deferred* two additional economic 765kV	\$8.5 billion (~\$2.6B deferred)

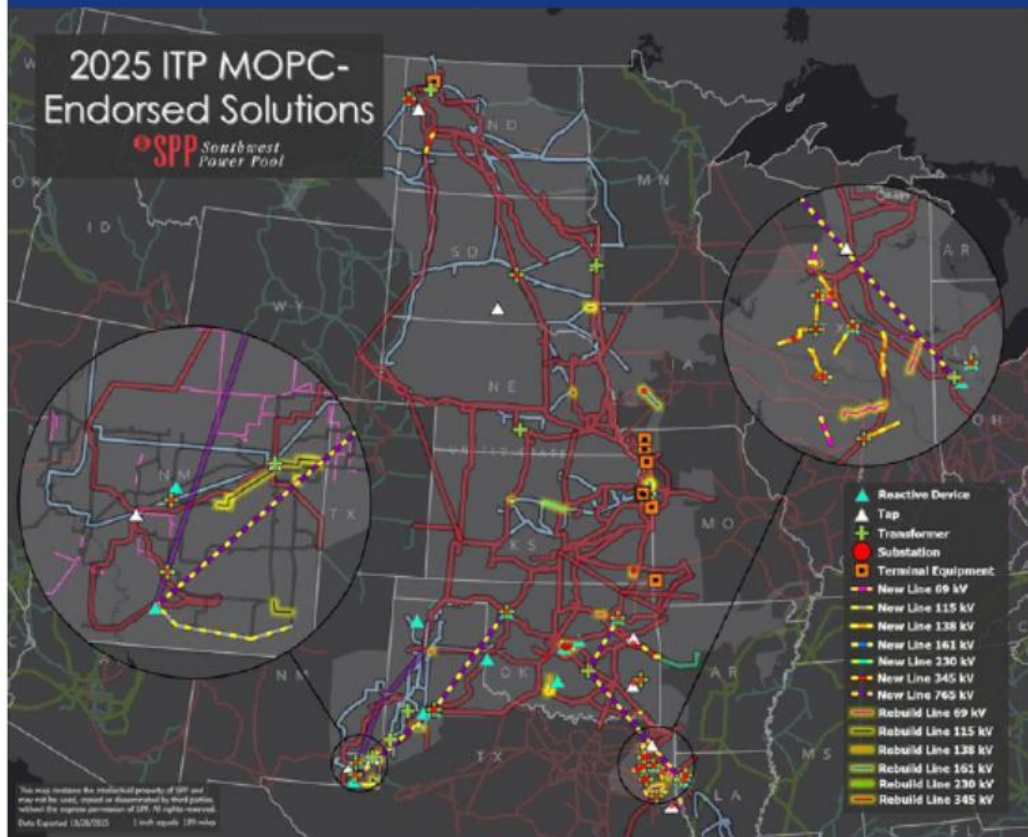
**Most projects deferred from the 2025 ITP will be further evaluated in the 2026 ITP along with other projects to solve needs*

3a—SPP Update 2025 ITP



3a—SPP Update 2025 ITP

2025 ITP PROJECTS RECOMMENDED FOR CONSTRUCTION



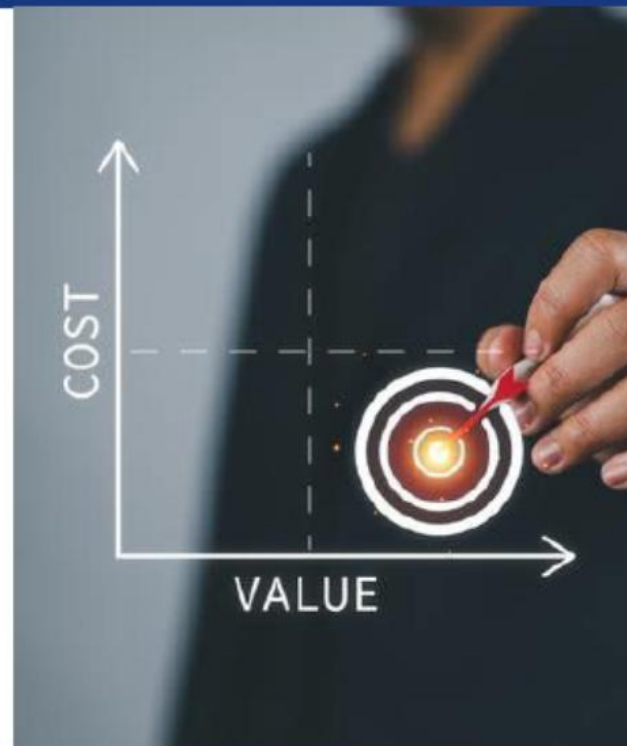
MOPC-Endorsed Portfolio:

MOPC endorsed an \$8.5 billion portfolio of projects for construction. This portfolio meets our grid's most urgent **reliability** needs while reserving **flexibility** to further analyze economically driven solutions.

3a—SPP Update 2025 ITP

VALUE PROVIDED BY THE 2025 ITP

- **MOPC** endorsed, and staff recommends, projects from the 2025 ITP that balance urgency, discipline, **reliability** and **affordability** to result in a no-regrets approach to transmission investment to meet our needs:
 - Increases capacity to reliably serve growing load
 - Addresses highest priority needs in the ITP
 - Builds a foundation for regional 765 kV capacity
- The \$8.5 billion portfolio MOPC endorsed for construction has **12:1** and **18:1 benefit-to-cost** ratios in Futures 1 and 2 respectively



Our combined portfolio, including reliability projects, provides significant return on investment

3a—SPP Update 2025 ITP

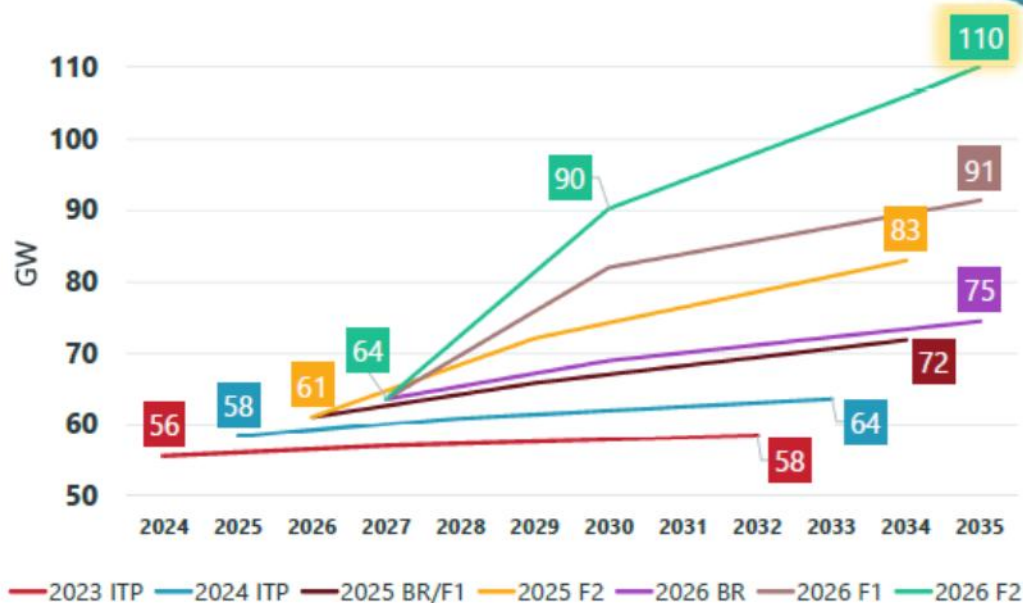
LOAD GROWTH IS ACCELERATING



Most up-to-date load projections show a **33-99%** increase from today

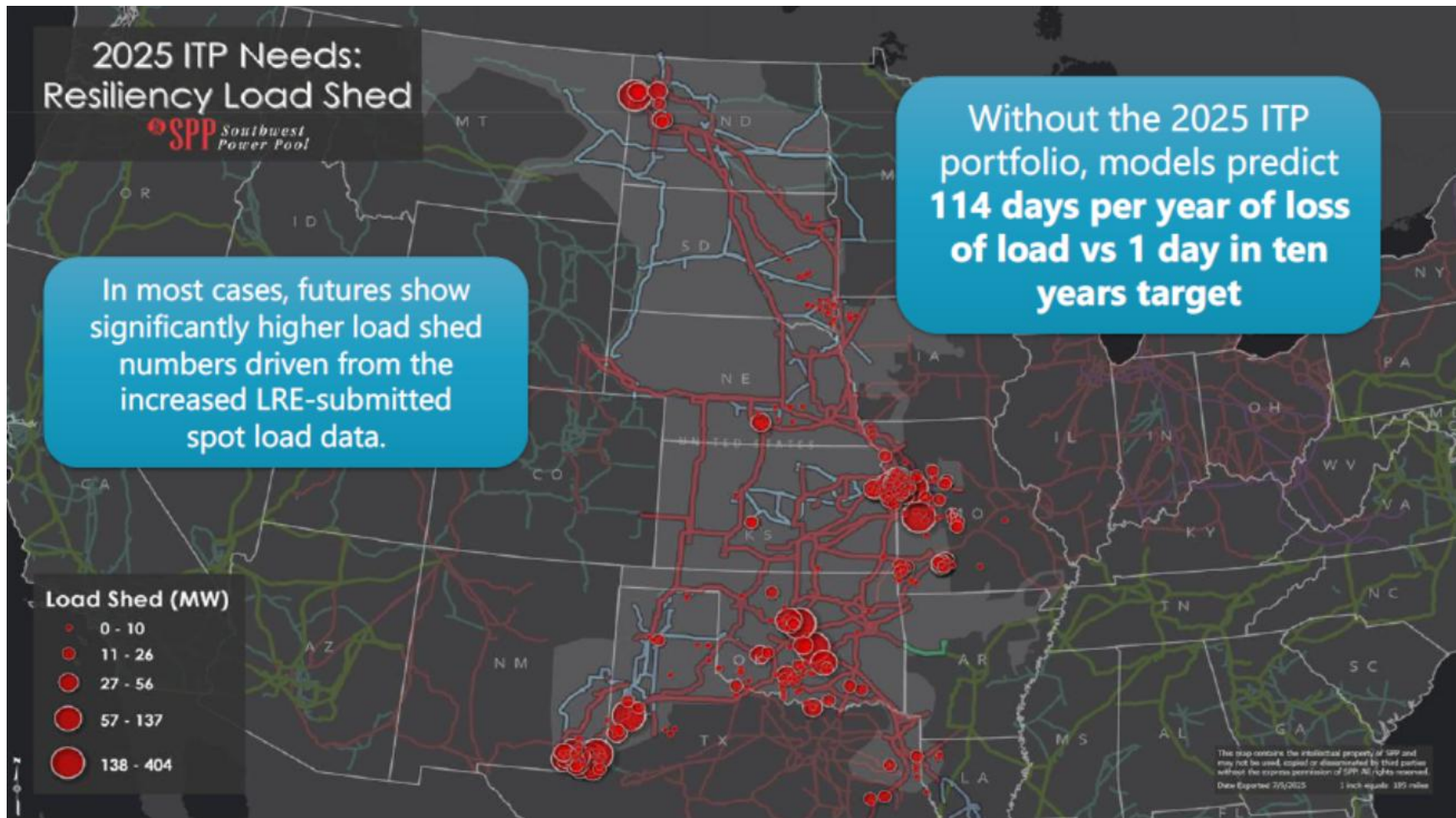
33% increase assumes **OMW** of submitted spot loads are realized

100% increase assumes **all** submitted spot loads are realized



Regional estimates align with national trends showing demand is increasing and at an accelerating pace

3a—SPP Update 2025 ITP



3a—SPP Update 2025 ITP

BENEFITS AND ATRR COSTS (FUTURE 1) MOPC-ENDORSED PORTFOLIO / STAFF RECOMMENDATION



Per 1,000 kWh					
Future 1 ATRR Costs by State					
State	One-Year ATRR Costs 2034 (\$M)	One-Year Benefit 2034 (\$M)	A ATRR Cost	B Transmission Benefit	A-B= Net Impact (2025\$)
Arkansas	\$81.67	\$103.36	\$4.54	\$5.75	(\$1.21)
Colorado	\$0.23	\$1.35	\$2.61	\$15.61	(\$13.00)
Iowa	\$20.80	\$149.28	\$2.57	\$18.45	(\$15.88)
Kansas	\$154.17	\$273.85	\$2.99	\$5.31	(\$2.32)
Louisiana	\$38.83	\$49.06	\$5.53	\$6.99	(\$1.46)
Minnesota	\$4.31	\$30.98	\$2.57	\$18.47	(\$15.90)
Missouri	\$106.54	\$215.83	\$3.18	\$6.45	(\$3.26)
Montana	\$3.22	\$23.15	\$2.57	\$18.47	(\$15.90)
Oklahoma	\$319.03	\$526.01	\$3.55	\$5.86	(\$2.31)
Nebraska	\$145.24	\$288.06	\$2.74	\$5.43	(\$2.69)
New Mexico	\$110.65	\$3,378.46	\$2.59	\$79.20	(\$76.61)
North Dakota	\$75.04	\$538.97	\$2.57	\$18.47	(\$15.90)
South Dakota	\$43.62	\$313.12	\$2.57	\$18.46	(\$15.89)
Texas	\$176.46	\$3,266.38	\$3.36	\$62.21	(\$58.85)
Wyoming	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$1,279.82	\$9,157.86	\$3.16	\$22.60	(\$19.44)

All states show beneficial net impact from the endorsed portfolio of projects

- Benefits and ATRR costs are allocated to the average retail residential ratepayer based on an estimated residential consumption of 1,000 kilowatt hours (kWh) per month. Net Impacts are compared to what rates would have been without the portfolio not to current rates.
- Benefits and costs for the 2034 study year were used to calculate rate impacts. All 2034 benefits and costs are shown in 2025 dollars.

3a—SPP Update 2025 ITP

BENEFITS AND ATRR COSTS (FUTURE 2) MOPC-ENDORSED PORTFOLIO / STAFF RECOMMENDATION



			Per 1,000 kWh		
Future 2 ATRR Costs State					
State	One-Year ATRR Costs 2034 (\$M)	One-Year Benefit 2034 (\$M)	A ATRR Cost	B Transmission Benefit	A-B= Net Impact (2025\$)
Arkansas	\$69.01	\$237.80	\$3.81	\$13.14	(\$9.32)
Colorado	\$0.20	\$2.23	\$2.30	\$25.93	(\$23.63)
Iowa	\$18.56	\$242.11	\$2.28	\$29.74	(\$27.46)
Kansas	\$152.14	\$865.99	\$2.60	\$14.79	(\$12.19)
Louisiana	\$42.21	\$135.15	\$4.59	\$14.68	(\$10.10)
Minnesota	\$3.85	\$50.24	\$2.28	\$29.76	(\$27.48)
Missouri	\$108.55	\$561.83	\$2.78	\$14.37	(\$11.60)
Montana	\$2.88	\$37.54	\$2.28	\$29.76	(\$27.48)
Oklahoma	\$331.89	\$2,159.04	\$3.23	\$20.99	(\$17.76)
Nebraska	\$136.22	\$818.75	\$2.40	\$14.42	(\$12.02)
New Mexico	\$107.48	\$2,923.98	\$2.20	\$59.94	(\$57.74)
North Dakota	\$66.94	\$874.01	\$2.28	\$29.76	(\$27.48)
South Dakota	\$39.10	\$510.24	\$2.28	\$29.74	(\$27.46)
Texas	\$200.80	\$4,066.70	\$2.63	\$53.25	(\$50.62)
Wyoming	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$1,279.82	\$13,485.61	\$2.74	\$28.85	(\$26.11)

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- Benefits and ATRR costs are allocated to the average retail residential ratepayer based on an estimated residential consumption of 1,000 kilowatt hours (kWh) per month. Net Impacts are compared to what rates would have been without the portfolio not to current rates.
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3a—SPP Update 2025 ITP

BENEFIT METRICS (FUTURE 1)

MOPC-ENDORSED PORTFOLIO / STAFF RECOMMENDATION



Future 1 Projected Benefits by State

State	Present Value of 40-yr Benefits for the 2029-2068 Period (in 2025 \$M)							Total Benefits	Present Value of 40-yr ATRRs (in 2025 \$M)	Established Benefit/ Cost Ratio
	APC Savings	Avoided or Delayed Reliability Projects	Capacity Savings from Reduced On-peak Losses	Assumed Benefit of Mandated Reliability Projects	Benefit from Meeting Public Policy Goals	Mitigation of Trans-mission Outage Costs	Updated Marginal Energy Losses Benefits			
Arkansas	\$1,837	\$0	\$40	\$252	\$0	\$254	(\$98)	\$2,286	\$883	2.6
Colorado	\$27	\$0	\$0	\$1	\$0	\$1	\$2	\$31	\$2	12.8
Iowa	\$2,960	\$0	\$2	\$86	\$0	\$81	\$196	\$3,325	\$224	14.9
Kansas	\$5,313	\$0	(\$13)	\$1,346	\$0	\$758	\$243	\$7,647	\$1,648	4.6
Louisiana	\$838	\$0	\$11	\$101	\$0	\$102	(\$17)	\$1,035	\$420	2.5
Minnesota	\$614	\$0	\$0	\$18	\$0	\$17	\$41	\$690	\$46	14.9
Missouri	\$3,959	\$0	\$3	\$466	\$0	\$501	\$630	\$5,558	\$1,139	4.9
Montana	\$459	\$0	\$0	\$13	\$0	\$13	\$30	\$516	\$35	14.9
Oklahoma	\$9,672	\$0	\$222	\$1,242	\$0	\$1,249	(\$1,321)	\$11,065	\$3,480	3.2
Nebraska	\$5,310	\$0	(\$14)	\$952	\$0	\$710	\$1,232	\$8,189	\$1,524	5.4
New Mexico	\$56,798	\$0	\$432	\$501	\$0	\$520	(\$2,390)	\$55,860	\$1,224	45.6
North Dakota	\$10,686	\$0	\$7	\$312	\$0	\$291	\$708	\$12,003	\$807	14.9
South Dakota	\$6,208	\$0	\$4	\$181	\$0	\$169	\$411	\$6,974	\$469	14.9
Texas	\$54,931	\$0	\$425	\$652	\$0	\$666	(\$2,240)	\$54,434	\$1,936	28.1
Wyoming	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	-	-
TOTAL	\$159,611	\$0	\$1,121	\$6,123	\$0	\$5,331	(\$2,573)	\$169,614	\$13,836	12.3

3a—SPP Update 2025 ITP

BENEFIT METRICS (FUTURE 2) MOPC-ENDORSED PORTFOLIO / STAFF RECOMMENDATION

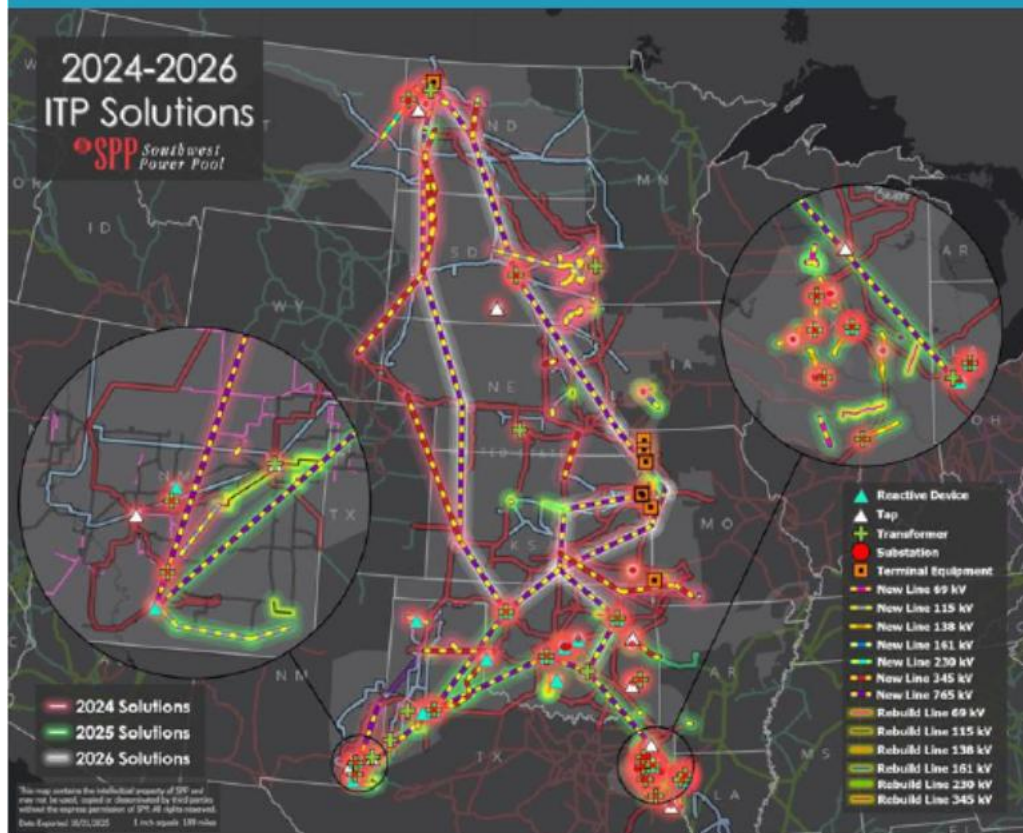


Future 2: Projected Benefits by State

State	Present Value of 40-yr Benefits for the 2029-2068 Period (in 2025 \$M)							Total Benefits	Present Value of 40-yr ATRRs (in 2025 \$M)	Established Benefit/ Cost Ratio
	APC Savings	Avoided or Delayed Reliability Projects	Capacity Savings from Reduced On-peak Losses	Assumed Benefit of Mandated Reliability Projects	Benefit from Meeting Public Policy Goals	Mitigation of Trans-mission Outage Costs	Updated Marginal Energy Losses Benefits			
Arkansas	\$4,577	\$0	\$36	\$223	\$0	\$318	(\$263)	\$4,890	\$754	6.5
Colorado	\$44	\$0	\$0	\$1	\$0	\$1	\$1	\$47	\$2	22.9
Iowa	\$4,789	\$0	\$2	\$77	\$0	\$101	\$122	\$5,092	\$195	26.1
Kansas	\$16,881	\$0	(\$13)	\$1,228	\$0	\$1,068	(\$665)	\$18,499	\$1,596	11.6
Louisiana	\$2,556	\$0	\$12	\$113	\$0	\$166	(\$66)	\$2,781	\$466	6.0
Minnesota	\$994	\$0	\$0	\$16	\$0	\$21	\$25	\$1,057	\$40	26.1
Missouri	\$10,876	\$0	\$3	\$557	\$0	\$725	\$783	\$12,944	\$1,161	11.1
Montana	\$743	\$0	\$0	\$12	\$0	\$16	\$19	\$789	\$30	26.1
Oklahoma	\$42,613	\$0	\$226	\$1,276	\$0	\$1,783	(\$2,714)	\$43,183	\$3,614	11.9
Nebraska	\$15,908	\$0	(\$14)	\$900	\$0	\$973	\$517	\$18,283	\$1,388	13.2
New Mexico	\$42,870	\$0	\$362	\$487	\$0	\$752	\$761	\$45,232	\$1,214	37.3
North Dakota	\$17,290	\$0	\$7	\$278	\$0	\$364	\$442	\$18,382	\$704	26.1
South Dakota	\$10,094	\$0	\$4	\$162	\$0	\$213	\$258	\$10,731	\$411	26.1
Texas	\$60,385	\$0	\$494	\$793	\$0	\$1,203	\$1,065	\$63,939	\$2,258	28.3
Wyoming	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	-	-
TOTAL	\$230,619	\$0	\$1,121	\$6,122	\$0	\$7,703	\$285	\$245,849	\$13,836	17.8

3a—SPP Update 2025 ITP

ITP: YESTERDAY, TODAY, AND TOMORROW



Solutions to transmission needs that have been identified in the **2024 ITP** and **2025 ITP**, and those that are projected to show up in the **2026 ITP**, are investments in reliable and affordable power across our entire region.

3b— Resource Adequacy Update

SPP, is a FERC-jurisdictional Regional Transmission Operator (RTO).

- By FERC tariff, SPP must set a Planning Reserve Margin (PRM) which maintains a 1 day in 10-year level of reliability (.1 day per year). See Section 4.0 of Attachment AA of SPP Tariff:
<https://www.spp.org/documents/58597/attachment%20aa%20tariff.pdf>
- SPP has delegated this authority to the Regional State Committee (RSC) consisting of a utility regulator from each state with retail load in the SPP—currently 12 members, including Kansas. While unlikely, if the RSC fails to act, the Board can act.
- Currently PRM is 15% for Summer/Winter. This is set to increase to 16% summer for Summer 26, 36% Winter of 26/27.
- PRM will increase to 17% for Summer 2029, 38% Winter 29/30.

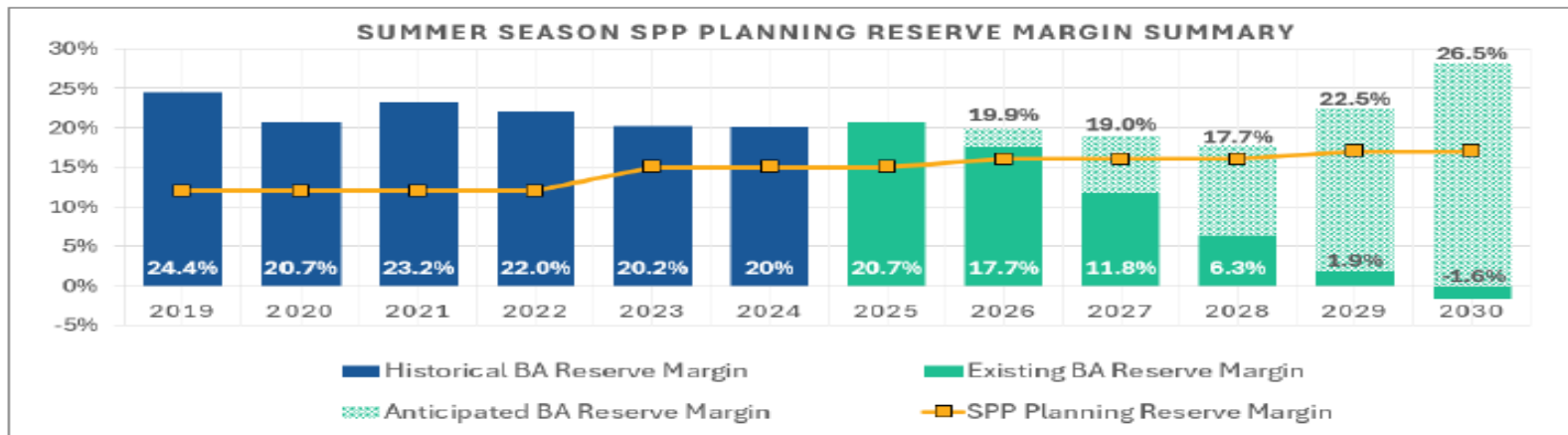
3b—Resource Adequacy Update

- Anticipating likely resource shortfalls without the addition of significant firm generating capacity in the next five years, SPP conceived the Expedited Resource Adequacy Study (ERAS) process in late 2024/early 2025.
- ERAS allowed load serving entities to bypass the generation interconnection queue process in order to study the interconnection of new generation resources, if shown necessary to meet the implementation of the 2029 PRM.
- Approved by FERC on July 21, 2025.
- See next slide for graphic depicting impact of ERAS.

3b—Resource Adequacy Update

Every June, SPP publishes a Resource Adequacy (RA) report detailing the anticipated levels of generation capable of meeting demand in the SPP region for the upcoming Summer.

- 2025's report can be located here:
 - <https://www.spp.org/documents/74099/2025%20spp%20summer%200resource%20adequacy%20report.pdf>
- The report shows adequate capacity for 2025, with a 20.7% reserve margin. However, by Summer 2027, without the addition of new generating resources, the report shows the reserve margin falling to 11.8%, below the level necessary to maintain 1-in-10 levels of reliability.
- Without anticipated generation additions between now and 2030, SPP projects a negative reserve margin of -1.6%. With anticipated generation additions, SPP anticipates the PRM growing to 26.5%.

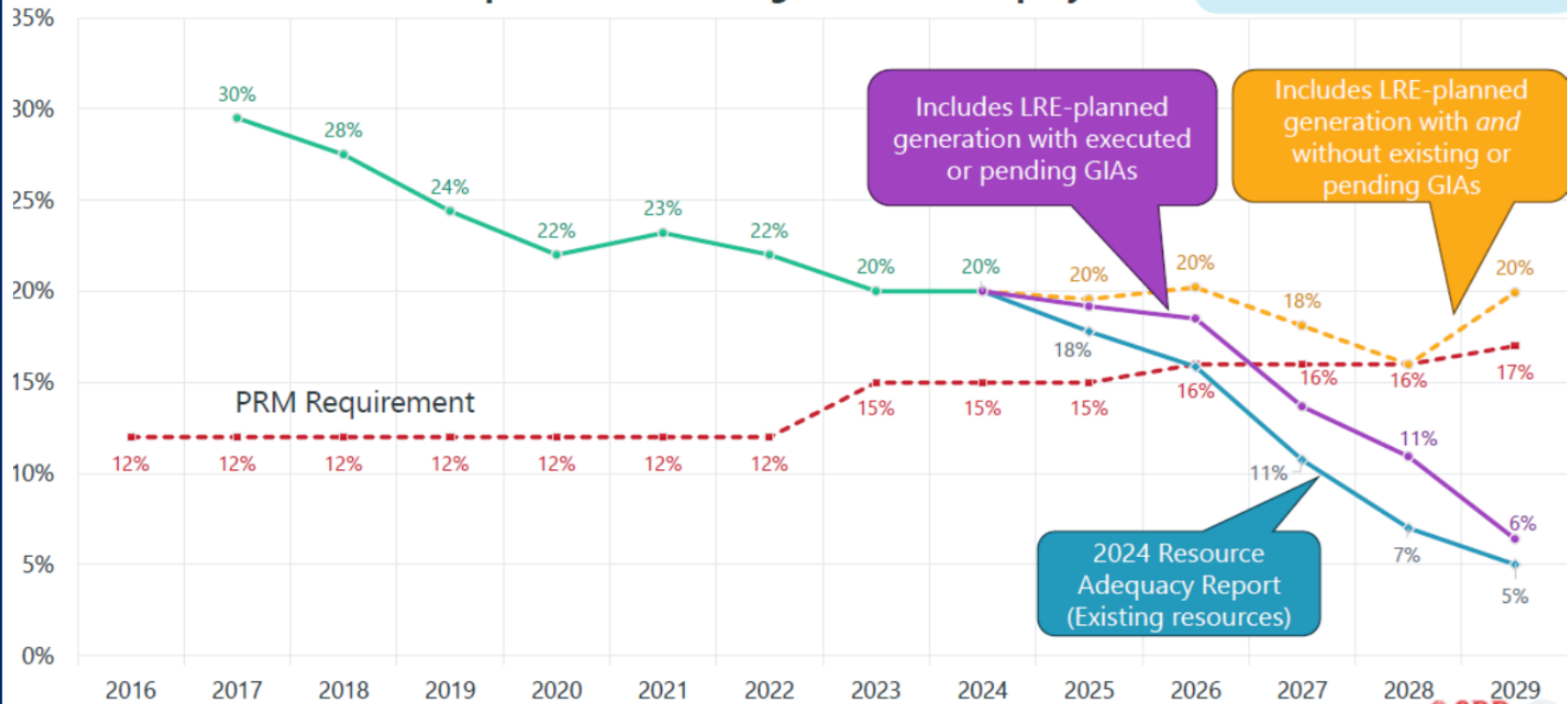


3b—Resource Adequacy Update

ANTICIPATED RESERVE MARGINS

Anticipated reserve margins from 2024 projections

Reserve margins could fall below PRM requirements without ERAS.



4a—Current Major KCC Dockets

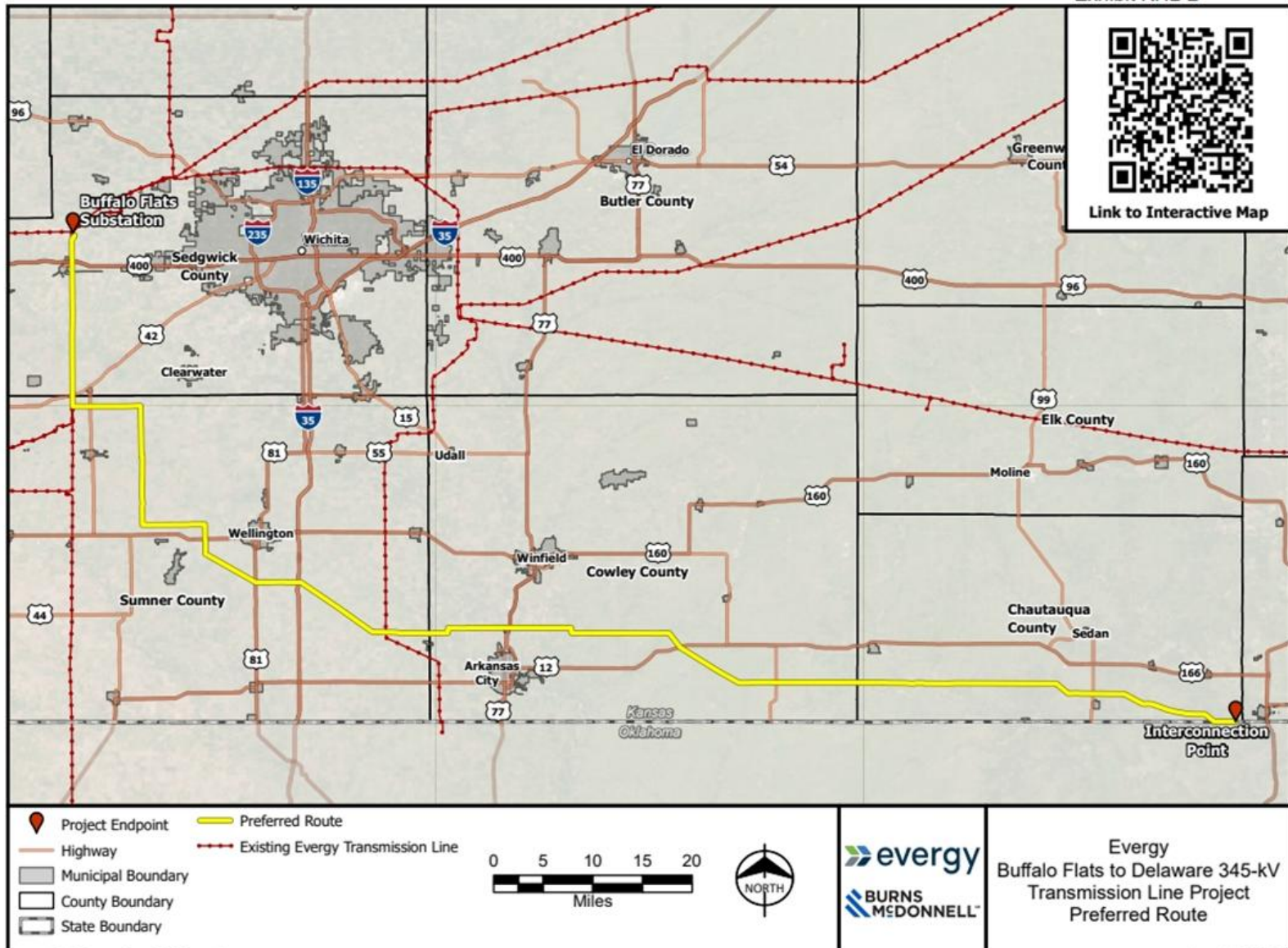
1. 26-EKCE-148-STG—Buffalo Flats to Delaware 345 kV Siting Application
 - A. Filed on November 14, 2025
 - B. Proceeds on a 180-day clock pursuant to 66-1,178
 - C. Evergy is requesting a permit to build a 133-mile 345 kV Transmission line traversing through Sedgwick, Sumner, Cowley, and Chautauqua Counties.
 - D. Public Hearings held in Sedan KS on January 7, 2026, and Windfield KS on January 8, 2026.
 - E. Evidentiary Hearing scheduled for March 11-12, 2026.
 - F. Commission Order due by May 13, 2026.

2. The Legal Standard for this proceeding is found in K.S.A 66-1,180, as follows:

“The commission shall make its decision with respect to the necessity for and the reasonableness of the location of the proposed electric transmission line, taking into consideration the benefit to both consumers in Kansas and consumers outside the state and economic development benefits in Kansas. The commission shall issue or withhold the permit applied for and may condition such permit as the commission may deem just and reasonable and as may, in its judgment, best protect the rights of all interested parties and those of the general public.”

4a—Current Major KCC Dockets

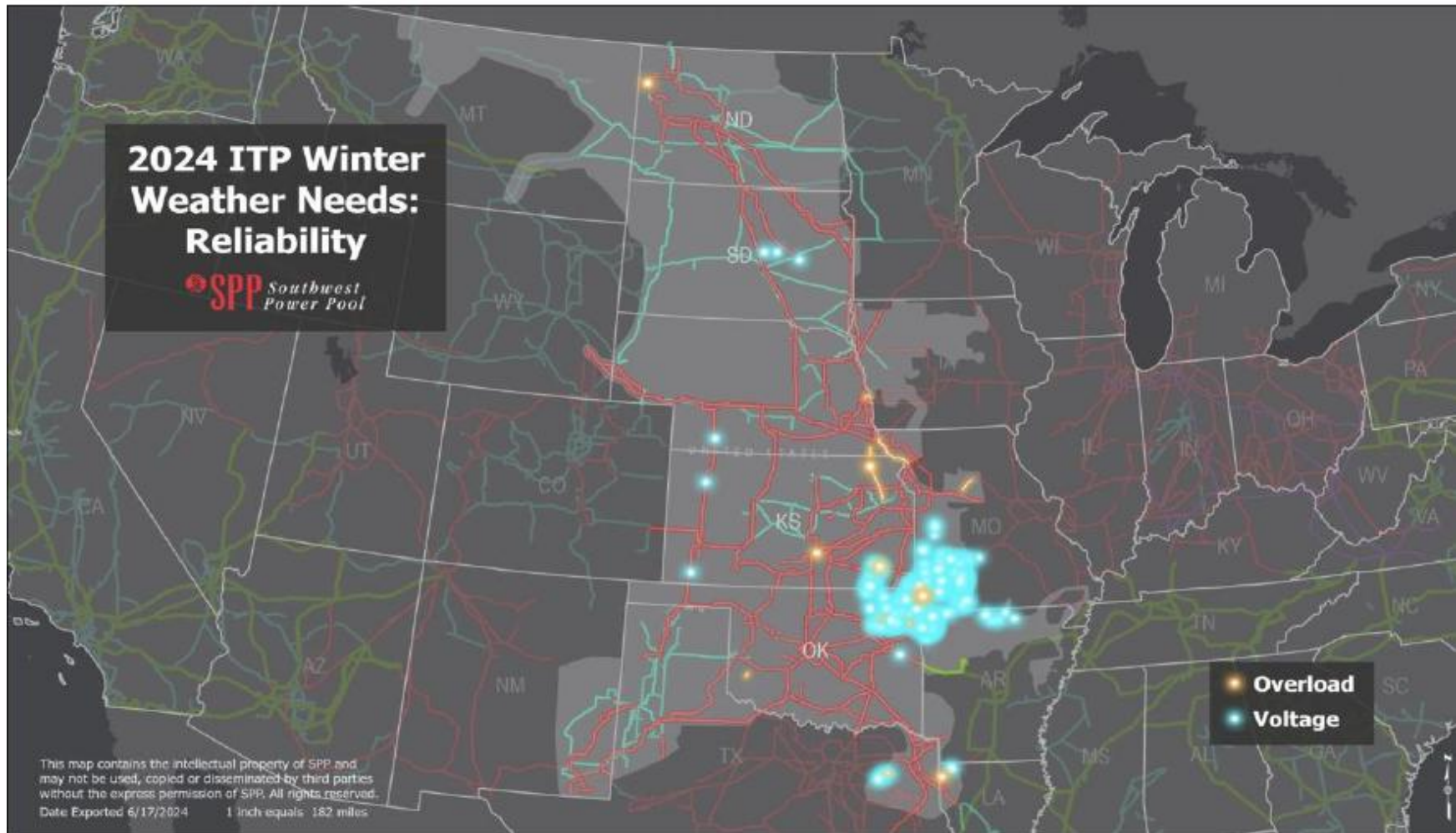
Exhibit KHL-2



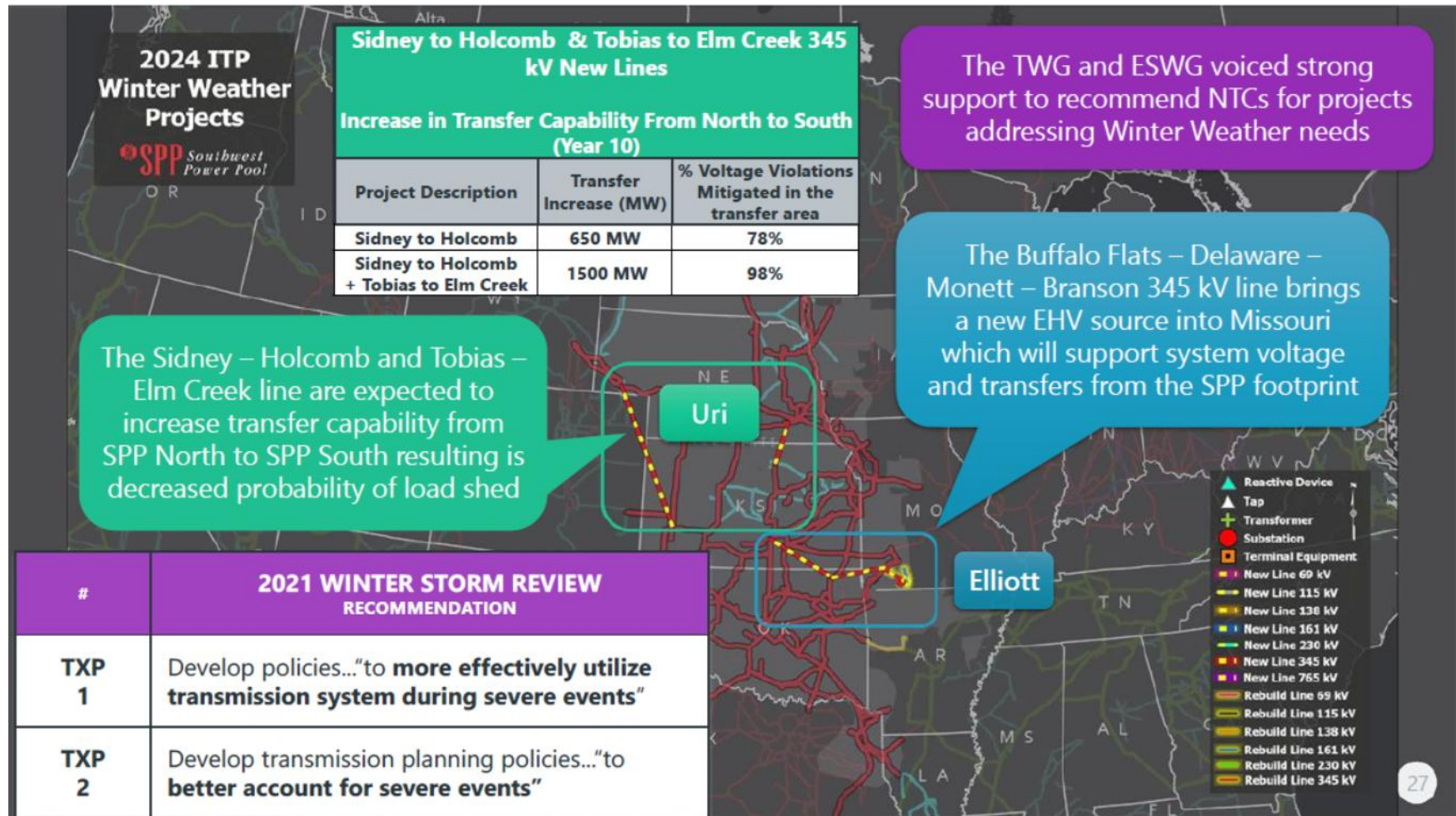
Source: Esri, Evergy, Burns & McDonnell

Issued: 10/22/2025

4a—Current Major KCC Dockets



4a—Current Major KCC Dockets



4b—Current Major KCC Dockets

1. 26-EPDE-180-RTS—Empire District Base Rate Case
 - A. Filed on December 30, 2025
 - B. Proceeds on a 240-day clock pursuant to 66-117
 - C. Empire is requesting a 93.77% increase in base rates, or \$15.8 million.
 - D. After projected fuel cost savings from Wind, and rebasing of PTS, Empire projects increase of \$12.1 million (72% base rate increase).
 - E. Empire requests a 3-year phase in, resulting in average residential bill increasing from \$135.38 to \$189.83 after the end of the three years (40% increase over three years).
 - F. Empire's Application points to \$85 million in new rate base not currently in rates.
 - G. Utilities Division Staff will devote substantial resources to the comprehensive review of this Application to ensure Empire's customers are paying just and reasonable, prudent, cost-based rates.

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