

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Commission Information Collection) Docket No. IC25-7-000
Activities)

COMMENTS OF EVERGY KANSAS CENTRAL, INC., EVERGY KANSAS SOUTH, INC., EVERGY METRO, INC., EVERGY MISSOURI WEST, INC., PRAIRIE WIND TRANSMISSION, LLC AND EVERGY GENERATING, INC.

I. INTRODUCTION

Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (referred to together as “Evergy Kansas Central”), Evergy Metro, Inc. (“Evergy Metro”), Evergy Missouri West, Inc. (“Evergy Missouri West”), Prairie Wind Transmission, LLC and Evergy Generating, Inc. (together as “Evergy”) respectfully submit the following comments pursuant to the notice¹ issued by the Federal Energy Regulatory Commission (“FERC” or “Commission”) in the above-captioned proceeding soliciting public comment and extensions on the currently approved information collections for FERC Form Nos. 1 (Annual Report of Major Electric Utilities, Licensees, and Others), 1-F (Annual Report for Nonmajor Public Utilities and Licensees), and 3-Q (Quarterly Financial Report of Electric Utilities, Licensees, and Natural Gas Companies).

On a combined basis, Evergy Kansas Central, Evergy Metro, and Evergy Missouri West provide electric service at retail throughout Kansas and Missouri to approximately 1.7 million customers and provide wholesale service to municipalities and cooperatives that in turn serve additional Kansas and Missouri retail customers. They are transmission owners in the Southwest

¹ *Commission Information Collection Activities (FERC Form Nos. 1, 1-F, and 3-Q); Comment Request; Extensions*, 90 Fed. Reg. 9,151 (Feb. 7, 2025).

Power Pool, Inc. (“SPP”) and have placed their transmission facilities under the SPP Open Access Transmission Tariff. Through their Generation and Marketing divisions, they are active participants in the wholesale electric market. Evergy Kansas Central, Evergy Metro and Evergy Missouri West are also major transmission customers in SPP, purchasing transmission service for their retail load, point-to-point service for their energy marketing activities, and acting as an agent for certain wholesale customers in purchasing transmission service on their behalf. The Companies file various FERC Forms with the Commission, including Form Nos. 1 and 3-Q, that are affected by this proceeding.

Evergy Generating is a rate-regulated electric utility and is a wholly-owned subsidiary of Evergy Kansas Central, Inc. Evergy Generating owns a 40% undivided interest in the State Line Combined Cycle Generating Facility, and sells all of its portion of the electric power to Evergy Kansas Central. Prairie Wind is a regulated utility that provides electric transmission services in the Southwest Power Pool (SPP) region in Kansas. Prairie Wind is owned 50% by Evergy Kansas Central, Inc. Evergy Generating and Prairie Wind file FERC Form Nos. 1 and 3-Q with the Commission.

As discussed herein, Evergy provides comments as requested by the Commission, regarding (1) whether the collections of information are necessary for the proper performance of the functions of the Commission, including whether the information will have practical utility; (2) the accuracy of the agency's estimates of the burden and cost of the collections of information, including the validity of the methodology and assumptions used; (3) ways to enhance the quality, utility, and clarity of the information collections; and (4) ways to minimize the burden of the collections of information on those who are to respond, including the use of automated collection techniques or other forms of information technology.

II. COMMENTS

1. Evergy has not received any questions from FERC staff or FERC jurisdictional customers on its 3-Q filings within the last 5 years. In contrast to Form 1, Form 3-Q is not utilized in Evergy's formula rates. Additionally, Evergy prepares public quarterly financial statements utilizing generally accepted accounting principles to support investors and shareholder informational needs leading to redundant information provided in Form 3-Q. Therefore, Evergy has ascertained the collection of information is not necessary for proper performance or functions of the Commission and information provided in Form 3-Q is not utilized.

2. Evergy supports the agency's estimate of the burden and cost of the collection of information. Various factors can impact the overall burden to utilities in providing the information required within Form 3-Q including employee compensation, efficiency of internal processes and the cost of required software which can vary depending on external and internal factors. Evergy calculated a similar estimate in the total burden while noting a slight understatement in the agency's average annual hours needed, partially offset by a slightly lower average hourly cost.

3. In order to enhance the quality, utility and clarity of the information collection, Evergy requests additional detail or resources that can be provided on FERC pages to explicitly state how information should be reported and what type of details are required for each page. While some FERC pages contain detail, the detail is not consistent across pages, which results in inconsistent data collection and reporting across the industry.

4. Specifically, Evergy requests additional instructions surrounding pages 232 and 278, the information on which is presented as quarter to date on the 3Q's and year to date on Form 1 which does not allow for comparison of these pages across quarterly and annual forms. Additional instructions and clarifications of certain column headings is requested. For example,

on page 232 – column e is referred to as “written off during the period” but page 278 does not indicate the same. Clarification around how FERC defines “written off during the period” on page 232 or expectations for the credits and debits column for pages 233 and 269 would be greatly beneficial to improving the consistency and reliability of information reporting and would allow for greater comparison across the industry. Additionally, there are multiple pages including 320-323 and 324-325 that are reported differently between 3-Q reporting and Form 1 reporting which requires page preparers to maintain multiple support files to provide the same type of data.

5. To minimize the burden of the collection of information, Evergy proposes the scope of the 3-Q be narrowed to include only core financials such as income statement, balance sheet, statement of retained earnings and discontinuing the requirement for supplemental pages in the 3-Q filing. If the Commission is utilizing 3-Q supplemental page data, Evergy recommends reviewing the required pages for Form 3-Q and evaluating if any of these pages can be eliminated in total based on relevance and applicability of the pages. For example, the cash flow statement is a specific statement that requires a heavy burden and is not used in ratemaking. Similarly, Page 304 is difficult to prepare and rate schedules are not uniform across utilities so it would be impossible to perform any type of comparison or benchmarking across the industry.

III. CONCLUSION

Evergy appreciates the opportunity to provide comments regarding the ongoing collection of information for the FERC forms covered in this docket. Evergy respectfully requests the Commission provide consideration to the comments herein in order to help reduce the current burden and increase form accuracy and clarity, including the proposal to eliminate the need for Form 3-Q reporting in totality or, if the Commission is utilizing certain information and not all

information, to review the required supplemental pages and narrow the scope of what is required for Form 3-Q reporting.

Respectfully submitted,

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