



**Comment Letter by Evergy, Inc. on Proposed
Climate Disclosure Rules**

June 17, 2022

Vanessa A. Countryman, Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

**Re: The Enhancement and Standardization of Climate-Related Disclosure for
Investors, Release Nos. 33-11042 and 34-94478; File No. S7-10-22**

Dear Ms. Countryman:

Thank you for the opportunity to provide comments on The Enhancement and Standardization of Climate-Related Disclosure for Investors, Release Nos. 33-11042 and 34-94478; File No. S7-10-22 (“Proposed Rule”). We applaud the ongoing efforts of the Commission to enhance and standardize climate-related disclosures.

As described below, this letter supports the joint comments submitted by The Edison Electric Institute (EEI) and American Gas Association (AGA), and respectfully requests that the Commission revise the Proposed Rule to incorporate the suggested changes from EEI and AGA so that the new disclosure requirements would be more balanced against the burdens that the new requirements would impose.

About Evergy, Inc.

Evergy, Inc. is a public utility holding company incorporated in 2017 and headquartered in Kansas City, Missouri. Evergy operates primarily through the following wholly-owned direct subsidiaries listed below:

- Evergy Kansas Central, Inc. a Kansas corporation incorporated in 1924, is an integrated, regulated electric utility that provides electricity to customers in the state of Kansas.
- Evergy Metro, Inc., a Missouri corporation incorporated in 1922, is an integrated, regulated electric utility that provides electricity to customers in the states of Missouri and Kansas.
- Evergy Missouri West, Inc., a Delaware corporation incorporated in 1986, is an integrated, regulated electric utility that provides electricity to customers in the state of Missouri.

Evergy, Inc., Evergy Kansas Central, Inc. and Evergy Metro, Inc. are separate registrants with the Commission. “Evergy” refers to Evergy, Inc. and its consolidated subsidiaries, unless otherwise indicated.

Evergy serves approximately 1,640,800 customers located in Kansas and Missouri. Customers include approximately 1,433,500 residences, 199,400 commercial firms and 7,900 industrials, municipalities, and other electric utilities.

Evergy has approximately 15,400 megawatts (MWs) of owned generating capacity and renewable power purchase agreements. Evergy's owned generation and power purchases from others, as a percentage of total megawatt hours (MWhs) generated and purchased, was approximately 70% and 30%, respectively, over the last three years. Evergy purchases power to meet its customers' needs, to satisfy firm power commitments or to meet renewable energy standards.

The core tenets of Evergy's strategy are as follows:

- **Affordability:** working to keep rates affordable and improve regional rate competitiveness;
- **Reliability:** targeting top-tier performance in reliability, customer service and generation; and
- **Sustainability:** advancing ongoing carbon emissions reductions and generation fleet transition.

Evergy's ESG Efforts

Today, almost half the power supplied to homes and businesses by Evergy comes from emission-free sources, creating reliable energy with less impact on the environment. Sustainability is important to us and has consistently been at the forefront of our business. Since 2005, we have reduced carbon emissions by 46 percent, and sulfur dioxide and nitrogen oxide emissions by 98 percent and 88 percent, respectively. Additionally, since 2001 we have increased our renewable energy resources by over 3900 percent and plan to add more.

Evergy is also committed to transparency. For years, Evergy has been providing, on its website, quantitative and qualitative data regarding various environmental, social, and governance (ESG) matters. There has been a proliferation in recent years of numerous alternative formats for reporting ESG matters, and Evergy has been a leader in interacting with its constituents to determine which of these frameworks to follow.

Evergy is an active member of EEI, which is an association that represents all U.S. investor-owned electric companies. Its members provide electricity for 220 million Americans and operate in all 50 states and the District of Columbia. Evergy was one of the initial members in EEI and Electric Power Research Institute (EPRI) groups focused on reporting uniform and consistent ESG data and information for the benefit of stakeholders interested in the industry's sustainability progress. Evergy annually publishes a Corporate Sustainability Report that includes much of this information, and regularly engages with third-party ESG ratings firms. In addition, Evergy recently released a report utilizing standards established by the Sustainability Accounting Standards Board (SASB) and Task Force on Climate-related Financial Disclosure (TCFD).

Participation in and Support of Joint Comments

Evergy participated in the joint drafting and commenting process conducted by EEI and the AGA to prepare their formal comments on the Proposed Rule. Evergy supports and agrees with the joint comments filed by EEI and AGA and reiterates that it is imperative that the Commission implement rules that recognize the inherent difficulty of obtaining accurate and timely climate-



related information and the resulting lack of comparability that these limitations necessarily produce. Furthermore, this climate-related information should provide investors with an appropriate and cost-effective level of detail that balances the value of any additional information that is required to be reported against the cost of developing and reporting that information.

Evergy respectfully requests that the Commission revise the Proposed Rule incorporating the joint comments submitted by EEI and AGA and believes that with these changes the new disclosure requirements will reflect a balanced approach that still ensures significant and beneficial enhancements to disclosure.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "S. Busser".

Steve Busser
Vice President, Chief Accounting Officer
Evergy, Inc.