

INTEGRATED RESOURCE PLAN (IRP)

Western Area Power Administration's (WAPA) customers must comply with the requirements of the Energy Planning and Management Program (EPAMP (10 CFR Part 905)) to meet the objectives of Section 114 of the Energy Policy Act of 1992 (EPAAct). A WAPA customer is any entity that purchases firm capacity with or without energy, from WAPA under a long-term firm power contract. Integrated Resource Planning allows customers to meet the objectives of Section 114 of EPAAct.

Integrated Resource Planning is a planning process for new energy resources that evaluates the full range of alternatives, including new generating capacity, power purchases, energy conservation and efficiency, renewable energy resources, district heating and cooling applications, and cogeneration, to provide reliable service to electric consumers. An Integrated Resource Plan (IRP) supports utility-developed goals and schedules. An IRP must treat demand and supply resources on a consistent and integrated basis. The plan must take into account necessary features for system operation, such as diversity, reliability, dispatchability, and other risk factors. The plan must take into account the ability to verify energy savings achieved through energy efficiency and the projected durability of such savings measured over time. (See 10 CFR § 905.11 (a)).

Who May Use This Form:

Utilities that primarily provide retail electric service that have limited staff, limited resource options, and obtain a significant portion of its energy needs through purchase power contracts are eligible to use this form. Utilities using this form may generate a limited amount of energy if the generating resources are primarily used as back up resources, to support maintenance and outages, or during periods of peak demand.

Completing This Form:

To meet the Integrated Resource Planning reporting requirement, complete this form in electronic format in its entirety. Unaddressed items will be deemed incomplete and the IRP may not be eligible for approval. All the data fields in this form automatically expand. Additional information may be attached to and submitted with this report. WAPA reserves the right to require supporting back-up materials or data used to develop this report. If there is any conflict between this form and the requirements defined in EPAMP, the requirements in EPAMP shall prevail.

EPAMP Overview

The Energy Planning and Management Program (EPAMP) is defined in the Code of Federal Regulations in Title 10, Part 905 (10 CFR 905). The purposes of EPAMP are to meet the objectives of the Energy Policy Act of 1992 (EPAAct) while supporting Integrated Resource Planning; demand-side management, including energy efficiency, conservation, and load management; and the use of renewable energy.

EPAMP was initially published in the Federal Register at 60 FR 54714 on October 20, 1995, and revised in 65 FR 16795 on March 30, 2000, and 73 FR 35062 on June 20, 2008. 10 CFR § 905.11 defines what must be included in an IRP.

WAPA's Integrated Resource Planning site (<https://www.wapa.gov/power-marketing/irp/>) provides extensive information on Integrated Resource Planning and reporting requirements. If you have questions or require assistance in preparing your IRP, contact your WAPA Regional Energy Services Representative.

IRP Content

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INTEGRATED RESOURCE PLAN (IRP) 5-Year Plan

Customer Name:
City of Clay Center, Kansas

IRP History: Check one as applicable.	
☐	This is the submitter's first IRP submittal.
☒	This submittal is an update/revision to a previously submitted IRP.

Reporting Dates:	
IRP Due Date:	7/1/2026
Annual Progress Report Due Date:	7/1/2027

Customer Contact Information: Provide contact information for your organization. The contact person should be able to answer questions concerning the IRP.	
Customer Name:	Clay Center Public Utilities
Address:	427 Court
City, State, Zip:	Clay Center, KS 67432
Contact Person:	Scott Glaves
Title:	Superintendent of Utilities
Phone Number:	785-632-2137
E-Mail Address:	sglaves@ccpuc.net
Website:	https://www.claycenterpublicutilities.com/

Type of Customer: Check one as applicable.	
☒	Municipal Utility X
☐	Electric Cooperative
☐	Federal Entity
☐	State Entity
☐	Tribal
☐	Irrigation District
☐	Water District
☐	Other (Specify):

SECTION 1**UTILITY/CUSTOMER OVERVIEW****Customer Profile:**

Enter the following data for the most recently completed annual reporting period. Data may be available on form EIA-861, which you submit to the U.S. Energy Information Administration (EIA).

Reporting Period	
Reporting Period Start Date (mm/dd/yyyy)	01/01/2025
Reporting Period End Date (mm/dd/yyyy)	12/31/2025
Energy Sales & Usage	
Energy sales to Ultimate End Customers (MWh)	44290.90
Energy sales for Resale (MWh)	
Energy Furnished Without Charge (MWh)	
Energy Consumed by Respondent Without Charge (MWh)	2815.9
Total Energy Losses (MWh entered as positive number)	8159.1
Total Energy Usage (sum of previous 5 lines in MWh)	55265.9
Peak Demand (Reporting Period)	
Highest Hourly Summer (Jun. – Sept.) Peak Demand (MW)	13.68
Highest Hourly Winter (Dec. – Mar.) Peak Demand (MW)	9.39
Date of Highest Hourly Peak Demand (mm/dd/yyyy)	08/08/2025
Hour of Highest Hourly Peak Demand (hh AM/PM)	05:00 PM
Peak Demand (Historical)	
All-Time Highest Hourly System Peak Demand (MW)	16.27
Date of All-Time Hourly System Peak Demand (mm/dd/yyyy)	8/12/2010
Hour of All-Time Hourly Peak System Demand (hh AM/PM)	4:00 PM
Number of Customers/Meters (Year End of Reporting Period)	
Number of Residential Customers	2,223
Number of Commercial Customers	352
Number of Industrial Customers	208
Other (Specify):	
Other (Specify):	
Other (Specify):	
Other (Specify):	
Other (Specify):	

Customer Service Overview:

Describe your customer service territory and the services provided. Include geographic area, customer mix, key customer and significant loads, peak demand drivers, competitive situation, and other significant or unique aspects of the customer and/or service territory. Provide a brief summary of the key trends & challenges impacting future resource needs including population changes, customer growth/losses, and industrial developments.

The Clay Center Public Utility Commission (CCPUC) is a not-for-profit municipal utility with a population of approximately 4,300 and a land base of approximately 18 square miles located at the junction of highways US-24 and K-15 in northeastern Kansas. Clay Center serves 2,223 residential customers, 352 commercial customers, and 208 industrial customers. Electric sales by customer class are distributed as follows:

- Residential – 46.16%
- Commercial – 20.49%
- Industrial – 33.35%

Within the city limits, the utility's largest customers include healthcare providers, the local school district, agricultural operations, agricultural manufacturing, and retail businesses. Outside the city limits, CCPUC maintains 180 miles of rural distribution line serving 337 customers, including residences, commercial businesses, and 51 seasonal agricultural irrigation systems.

CCPUC is experiencing modest growth in residential housing, however, overall electric sales recently have been relatively flat, somewhat attributable to cyclical summer season weather. Although CCPUC hasn't historically weather normalized its load, since CCPUC's last IRP submission in 2021 this region's Cooling Degree Day (CDD) summer season totals compared to the seasonal mean since 2000 has been as follows:

2021 – 5.1% over the mean
2022 – 5.5% over the mean
2023 – 2.8% over the mean
2024 – Flat to the mean
2025 – 7.6% under the mean

One important factor in future load growth is the Keystone Pipeline, now known as South Bow. CCPUC's service territory includes Pump Station No. 27. Construction on the pump station continued through October 2021 and is approximately 85% complete. CCPUC owns the substation and 3.5 miles of 115 kV transmission line that will serve the station, both completed in 2021. The original load forecast for the facility was 20 to 25 MW. Although the station is currently idle, it remains likely that it could come online in the future and if that's confirmed, we'll adjust our load forecast accordingly in the next annual update.

Electricity Utility Staff & Resources:

Summarize the number of full-time equivalent employees by primary functions such as power production, distribution, and administration. Describe any resource planning limitations, including economic, managerial, and/or resource capabilities.

CCPUC employs 31 full-time staff members. The power plant employs 12 full-time employees, including supervisors, operators, and maintenance personnel. The distribution team includes six full-time employees, including journeyman linemen, substation technicians, and master electricians. The electric department also includes four full-time administrative employees.

CCPUC owns and maintains its local generation and distribution system. The power plant has a peak generating capacity of 22 MW and operates six dual-fuel internal combustion engines. The plant is staffed 24 hours a day, 365 days a year and personnel not only operate the power plant, they build offer templates for unit submissions into the Southwest Power Pool and respond to electric outages. The CCPUC power plant is a valuable community resource, providing backup energy during transmission outages, scheduled maintenance, and support KPP and SPP during severe winter or summer weather events.

Since CCPUC is a member of KPP Energy (KPP), their staff generates all the load, capacity, and energy analysis for the KPP members in order to comply with SPP's Resource Adequacy Requirements. KPP also has an energy management agreement with Tenaska Power Services, who act as an extension of staff when necessary.

Historical Energy Use:

Enter the peak system demand and total annual energy use for the preceding ten (10) reporting years. For total energy, include retail sales, energy consumed or provided without charge, and system losses.

Reporting Year	Peak Demand (MW)	Total Energy (MWh)
2016	14.02	53365
2017	14.71	51949
2018	14.10	55120
2019	13.99	53411
2020	12.76	52510
2021	14.21	53203
2022	15.70	53957
2023	14.84	52623
2024	14.35	51537
2025	13.68	55266

SECTION 2 | FUTURE ENERGY SERVICES PROJECTIONS

Load Forecast:

Provide a load forecast summary for the next ten (10) years; **and** provide a narrative statement describing how the load forecast was developed. Discuss any expected future growth. If applicable, you may attach a load forecast study and briefly summarize the results in this section. (See 10 CFR § 905.11 (b) (5)).

Load Forecast:

Reporting Year	Peak Demand (MW)	Total Energy (MWh)
2026	14.09	52644
2027	14.30	53433
2028	14.52	54235
2029	14.73	55048
2030	14.95	55874
2031	15.17	56712
2032	15.41	57563
2033	15.64	58426
2034	15.87	59302
2035	16.11	60192

Narrative Statement:

KPP staff performs all load forecasting for its members. They utilized weather normalization techniques to determine a Peak Demand forecast for 2026. While extreme weather periods can cause significant annual deviations from the P50 forecast, the methodology does an adequate job of predicting the load over time. The following years were escalated by an annual rate of 1.5% for intrinsic load growth. The growth rate will be monitored and adjusted as needed.

SECTION 3

EXISTING SUPPLY-SIDE RESOURCES

Existing Supply-Side Resource Summary:

Provide a general summary of your existing supply-side resources including conventional resources, renewable generation, and purchase power contracts (including WAPA contracts). Describe the general operation of these resources and any issues, challenges, or expected changes to these resources in the next five (5) years. (See 10 CFR § 905.11 (b) (1)).

CCPUC's internal system resources consist of six dual fuel generators with an approximate nameplate capacity of 22 MW's. It purchases 1.6 MW of capacity from WAPA through a firm electric contract and purchases the balance of "supplemental" requirements from the KPP.

CCPUC's dual fuel generators are offered economically into the Southwest Power Pool's Integrated Market and are dispatched when economically feasible based on cost-based offers. Once the solar project is online, the output will be a load modifier, reducing CCPUC's overall load by the net production from the solar facility. As of now, CCPUC has no short-term plans on expanding or retiring its city owned generation, only to maintain its operational flexibility and reliability through stringent maintenance requirements.

Since KPP purchases all its load from SPP, CCPUC can take advantage of other SPP members economically dispatched energy. Especially with SPP's large wind penetration, there are large number of hours during the year that CCPUC's load is being served with energy cheaper than it can produce which helps translate into real cost savings for its customers.

Transmission. CCPUC is interconnected at 115 kV with Evergy. KPP provides transmission service for WAPA and KPP purchases under Southwest Power Pool (SPP) network integration transmission service (NITS). KPP serves as the scheduling agent for the SPP transmission service. Transmission service is provided under terms in the KPP Operating Agreement, to which CCPUC is a party.

Existing Generation Resources:

List your current supply-side resources, including conventional resources and renewable generation. If you do not own any generating resources, insert N/A in the first row. Insert additional rows as needed.

Resource Description (Identify resources as base load, intermediate, or peaking)	Fuel Source	Rated Capacity (MW)	In-Service Date (Year)	Estimated Expiration/Retirement Date (Year)
Clay Center IC 1 - Peaking	Nat Gas/Diesel	.9	1958	N/A
Clay Center IC 2 - Peaking	Nat Gas/Diesel	2.1	1966	N/A
Clay Center IC 3 - Peaking	Nat Gas/Diesel	5	1972	N/A
Clay Center IC 4 - Peaking	Nat Gas/Diesel	3.5	1996	N/A
Clay Center IC 5 - Peaking	Nat Gas/Diesel	3.5	1996	N/A
Clay Center IC 6 - Peaking	Nat Gas/Diesel	6.72	2005	N/A
KPP Resource Soloman BESS Appx. CCPUC Allocation	Battery	.06	2022	N/A
KPP Resource JOU Dogwood – Base, Appx. CCPUC Allocation	Natural Gas	4.3	2003	N/A

Existing Purchase Power Resources:

List your current purchase power resources. Define whether the contract provides Firm Service, Non-Firm Service, all requirements, or another type of service. Include WAPA resources. If applicable, include a summary of resources that are under a net metering program. Insert additional rows as needed.

Resource Description	Fuel Source (If applicable)	Contracted Demand (MW)	Type of Service (Firm, Non-Firm, Requirements, Other)	Expiration Date (Year)
WAPA	Hydro	1.6	Firm	2054

Resource Description	Fuel Source (If applicable)	Contracted Demand (MW)	Type of Service (Firm, Non-Firm, Requirements, Other)	Expiration Date (Year)
KPP Resource Greensburg Wind PPA – Variable, Appx. CCPUC Allocation	Wind	.83	Firm	03/2030
KPP Resource Marshall Wind PPA- Variable, KPP Appx. CCPUC Allocation	Wind	1.65	Firm	05/2036

SECTION 4**EXISTING DEMAND-SIDE RESOURCES**

Demand-side programs alter a customer's use pattern and include energy conservation, energy efficiency, load control/management, education, and distribution system upgrades that result in an improved combination of energy services to the customer and the ultimate consumer.

Existing Demand-Side Resources:

List your current demand-side programs, including energy conservation, energy efficiency, load control/management, education, or maintenance plans, or system upgrades. Programs may impact the utility distribution system, municipally owned facilities, and/or end-user energy consumption. Refer to Section 9 of this form for a list of example programs. Insert additional rows as needed.

(See 10 CFR § 905.11 (b) (1)).

Program Description	Estimated Program Savings (MW and/or MWh if known) (Include annual impact and impact over the life of the program if known.)
CCPUC and KPP offer a Residential Rebate program for the installation of high efficiency appliances and level 2 charging stations.	Since CCPUC's last 5-year IRP, it has issued 6 rebates for A/C units and 3 EV level 2 chargers. CCPUC has not calculated the program savings.
CCPUC and KPP offer a Commercial Rebate program for the installation of high efficiency appliances.	No material interest from businesses.
The Kansas Energy Office, a division of the Kansas Corporation Commission (KCC), administers several programs and funding is provided by the federal State Energy Program. A link to the KCC programs is listed on CCPUC's website.	Do not track individual applications filed with the KCC at this time.

SECTION 5

FUTURE RESOURCE REQUIREMENTS AND RESOURCE OPTIONS

Balance of Loads and Resources (Future Resource Requirements):

Provide a narrative statement that summarizes the new resources required to provide retail consumers with adequate and reliable electric service during the 5-year resource planning period. Identify any federal or state regulations that may impact your future resource requirements. If you are not experiencing or anticipating load growth and a need for new resources, describe your current procedure to periodically evaluate the possible future need for new resources.

CCPUC's current projections show the utility has enough generation to cover its city load, however, CCPUC is a member of KPP and therefore its load is aggregated together with all other KPP members. KPP, as the Load Responsible Entity within SPP, is responsible for adhering to SPP's tariff and business practices regarding Resource Adequacy Requirements for the aggregated KPP load. Looking forward, using known variables for load and generation assumptions and estimating SPP's future Planning Reserve Margins, KPP shows a small surplus for its capacity position over the 5-year planning horizon.

With an approximate in-service date of July 2026, KPP's PACE Solar project will provide CCPUC with 3 MW's of solar within its registered service system territory. This KPP project was largely funded through the Powering Affordable Clean Energy program under the Inflation Reduction Act.

Although CCPUC at this time has no plans to connect a new large load, if that becomes a possibility, KPP has developed a Large Load Policy for its city members to provide guidelines for capacity requirements associated with any large load additions.

Identification of Resource Options

Identification and comparison of resource options is an assessment and comparison of existing and future supply-side and demand-side resources available to a customer based upon size, type, resource needs, geographic area, and competitive situation. Resource options evaluated must be identified. The options evaluated should related to the resource situation unique to each WAPA customer as determined by profile data such as service area, geographical characteristics, customer mix, historical loads, projected growth, existing system data, rates, financial information, and load forecast. (See 10 CFR § 905.11 (b) (1)).

Considerations that may be used to develop potential resource options include cost, market potential, consumer preferences, environmental impacts, demand or energy impacts, implementation issues, revenue impacts, and commercial availability. (See 10 CFR § 905.11 (b) (1) (iii)).

Future Supply-side Options:

List the future supply-side resource options that were considered and evaluated, including, but not limited to conventional generation, renewable generation, and power purchase contracts. Include a brief discussion on the applicability of each option for further consideration or implementation based on your system requirements and capabilities. If new resources are not required during the 5-year resource planning period, please indicate that below. Insert additional rows as needed. (See 10 CFR § 905.11 (b) (1)).

Supply-Side Option	Applicability for Implementation or Further Consideration
None	CCPUC isn't considering any additional city owned generation and will utilize KPP for any future capacity and energy requirements.

Future Demand-side Options:

List the future demand-side resource options that were considered and evaluated. Demand-side programs alter a customer's use pattern and include energy conservation, energy efficiency, load control/management, education, and distribution system upgrades that result in an improved combination of energy services to the customer and the ultimate consumer. Include a brief discussion on the applicability of each option for further consideration or implementation based on your system requirements and capabilities. Insert additional rows as needed. (See 10 CFR § 905.11 (b) (2)).

Demand-Side Option	Applicability for Implementation or Further Consideration
Advanced Metering and associated Demand Response programs	Several years ago, CCPUC evaluated installing advanced metering but for logistical and cost reasons, decided to pass on purchasing and installing. There is a new technology coming out that removes the logistical issues previously identified, however, costs are unknown.

Resource Options Chosen:

Describe the resource options that were chosen for implementation or further consideration and clearly demonstrate that decisions were based on a reasonable analysis of the options. Resource decisions may strike a balance among applicable evaluation factors such as cost, market potential, customer preferences, environmental impacts, demand or energy impacts, implementation issues or constraints, revenue impacts, and commercial availability. (See 10 CFR § 905.11 (b) (1) (iv)).

Since the last 5-year IRP, CCPUC as part of KPP, will have a 3 MW solar resource added to its system. As mentioned in section 3, in 2023 KPP filed an application to seek a project loan as part of the Powering Affordable Clean Energy (PACE) program. KPP cited the capacity from this project would help replace the lost capacity from a coal-based power contract that expired towards the end of 2022. The project would not only add a new source of clean energy to KPP's wind contracts, but augment KPP's generation portfolio.

All other resource options to support CCPUC will be evaluated by KPP staff and approved by the KPP board of directors.

SECTION 6

ENVIRONMENTAL EFFECTS

Environmental Effects:

To the extent practical, WAPA customers must minimize environmental effects of new resource acquisitions and document these efforts. IRPs must include a qualitative analysis of environmental impacts in summary format. Describe the efforts taken to minimize adverse environmental effects of new resource acquisitions. Describe how your planning process accounts for environmental effects. Include a discussion of policies you conform with or adhere to, and resource decisions that have minimized or will minimize environmental impacts by you and/or your wholesale electricity supplier(s). WAPA customers are neither precluded from nor required to include a qualitative analysis of environmental externalities as part of the IRP process. If you choose to include a quantitative analysis, in addition to the summary below, please attach separately. (See 10 CFR § 905.11 (b) (3)).

Clay Center Public Utility Commission (CCPUC) recognizes the importance of balancing system reliability, affordability, and environmental stewardship in the development of its Integrated Resource Plan (IRP).

The current generation portfolio includes dual-fuel (natural gas primary and diesel-fired backup) peaking units used to support reliability during emergency conditions, peak demand periods, and transmission outages. While these resources provide operational flexibility and resilience, they also produce air emissions and other environmental impacts that must be managed responsibly.

CCPUC currently operates dual-fuel units with a combined installed capacity of 22 MW. These units are primarily dispatched during emergency events and periods of high system demand within the SPP Integrated Market.

CCPUC is very aware of environmental effects associated with combustion-based generation which include:

Air Emissions

Diesel combustion produces several regulated air pollutants, including:

- Nitrogen oxides (NOx)
- Sulfur oxides (SOx)
- Carbon monoxide (CO)
- Particulate matter (PM)
- Volatile organic compounds (VOCs)

Because the units run primarily on natural gas, Sox and particulate emissions are substantially lower than they would be under sustained diesel operation.

Greenhouse gas emissions, including carbon dioxide (CO₂):

Although annual operating hours remain low, these units produce higher emissions per megawatt-hour compared to renewable generation resources. Natural gas operation produces meaningfully lower CO₂ per megawatt-hour than diesel operations. Actual annual emissions vary depending on fuel-mix, natural gas vs. diesel, operating hours maintenance practices, and system demand conditions; detailed and reported emission records are available upon request.

Noise Impacts

Engine operation produces localized noise impacts, particularly during nighttime emergency operations. Existing facilities utilize sound attenuation equipment and enclosure systems designed to minimize off-site impacts to nearby residential and commercial areas.

Fuel Storage and Spill Risk

On-site diesel storage (maintained for pilot fuel and for full-diesel operation during natural gas curtailments) presents potential environmental risks associated with:

- Fuel leaks
- Groundwater contamination
- Stormwater impacts
- Soil contamination

CCPUC maintains spill prevention and containment systems in compliance with applicable federal and state regulations. Preventive maintenance and inspection programs are conducted regularly to minimize environmental risk.

CCPUC operates its diesel generation resources in accordance with all applicable state and federal environmental regulations and permitting requirements, including:

- Federal Clean Air Act requirements
- State air quality permitting standards
- Spill Prevention, Control, and Countermeasure (SPCC) requirements
- Hazardous materials handling regulations
- Stormwater management requirements

CCPUC anticipates future environmental regulations may impose stricter emissions limitations, additional reporting requirements, or carbon reduction measures during the planning horizon.

Evaluation of Alternative Resources

As part of the IRP process, CCPUC evaluates alternative generation and demand-side resources with lower environmental impacts than conventional combustion generation.

Renewable Energy Resources

Solar photovoltaic generation was identified as a cost-effective resource capable of reducing fuel consumption and emissions associated with engine operation.

Benefits include:

- Zero direct air emissions during operation
- Reduced greenhouse gas emissions
- Minimal water consumption
- Reduced fuel transportation requirements

Battery Energy Storage Systems (BESS) were evaluated as an alternative for load modification and contingency support. Benefits include:

- Elimination of combustion-related emissions
- Fast response capability
- Improved integration of renewable resources
- Reduced runtime for diesel generators
- Demand-Side Management

Energy efficiency and demand response programs were also evaluated as methods to reduce system peak demand and defer additional fossil-fuel generation requirements.

Mitigation Measures

To reduce environmental impacts associated with diesel generation, the utility plans to implement the following mitigation measures:

- Continued operation on natural gas as the primary fuel, with diesel limited to pilot fuel and gas curtailment conditions
- Continued use of ultra-low sulfur diesel fuel
- Routine emissions testing and maintenance
- Reduced annual operating hours where feasible
- Increased use of renewable energy resources
- Installation of battery storage systems to offset diesel runtime

- Ongoing operator environmental compliance training

Additionally, future procurement decisions will prioritize lower-emission technologies where economically and operationally feasible.

Long-Term Environmental Strategy

CCPUC's long-term strategy is to maintain dual-fuel generation primarily as an emergency reliability resource while reducing dependence on fossil-fuel generation over the IRP planning horizon. The preferred resource portfolio includes:

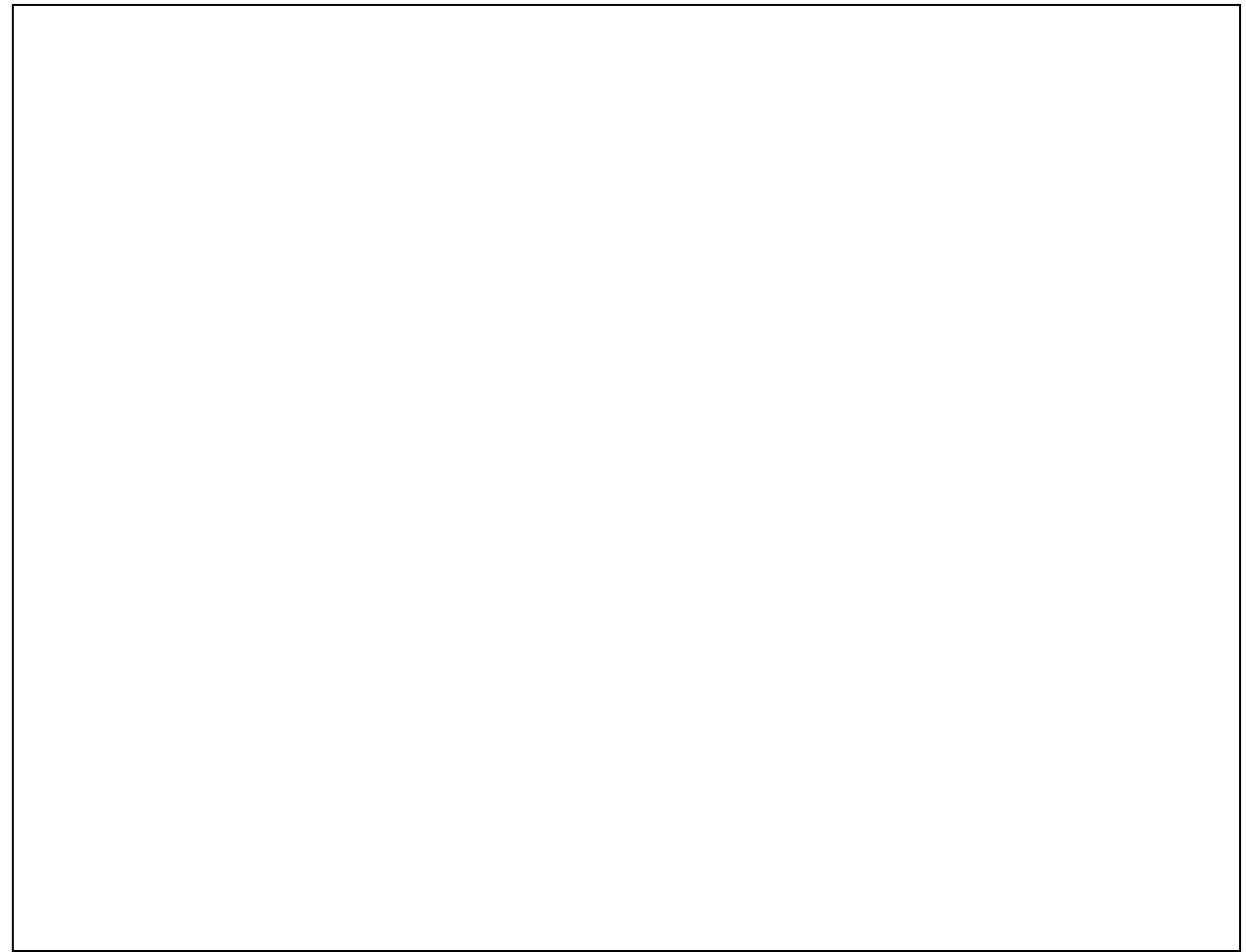
- Expanded solar generation capacity
- Utility-scale battery storage deployment if possible
- Gradual reduction in diesel dispatch frequency

Implementation of the preferred portfolio is expected to reduce fuel consumption and associated emissions significantly over the planning horizon.

Conclusion

Dual-fuel generation remains an important component of system reliability for CCPUC; however, it presents environmental impacts that must be carefully managed. The IRP identifies a balanced transition strategy that maintains reliable electric service while reducing emissions, fuel usage, and environmental risk through increased use of renewable energy, storage technologies, and demand-side resources.

CCPUC will continue monitoring environmental regulations, technological developments, and resource performance throughout the IRP planning period to ensure responsible and sustainable system planning.



SECTION 7

PUBLIC PARTICIPATION

Public Participation:

Customers must provide ample opportunity for full public participation in preparing and developing an IRP. Describe the public involvement activities, including how information was gathered from the public, how public concerns were identified, how information was shared with the public, and how your organization responded to the public's comments. (See 10 CFR § 905.11 (b) (4)).

The CCPUC holds bi-weekly Commission meetings which are open to the public. The meeting information and agenda are published on various traditional and social media avenues. While the CCPUC welcomes consumer comments and questions regarding electric rates and supply options, there is rarely any feedback.

SECTION 8

ACTION PLAN & MEASUREMENT STRATEGIES

Action Plan Summary:

Describe the high-level goals and objectives that are expected to be met by the implementation of this resource plan within the 5-year resource planning period. Include longer term objectives and associated time period(s) if applicable. (See 10 CFR § 905.11 (b) (2)) and (See 10 CFR § 905.11 (b) (6)).

Generally speaking, the goal of the city is to stay within the city's budgeted amount for electric supply. If large deviations occur, an assessment is done to identify the drivers and if applicable, options to minimize future rate impacts are analyzed.

KPP's strategic plan moving forward includes evaluating several cost controlling solutions for its membership. While facing inflationary challenges associated with fuel, infrastructure and data center load growth, KPP is working on creative solutions to ensure its membership has adequate capacity to meet SPP's fluctuating reserve requirements and also to protect the membership from volatile energy prices.

Specific Actions:

List specific actions you will take to implement your plan over the 5-year planning horizon.

New Supply-Side Resource Acquisitions:

List new resource options your organization is planning to implement, investigate, or pursue in the next five years. Include conventional generation, renewable resources, net metering programs, and purchase power contracts. Include key milestones such as the issuing an RFP, executing a contract, or completing a study. (See 10 CFR § 905.11 (b) (2)).

Proposed New Resource	Begin Date	Est. New Capacity (MW)	Milestones to evaluate progress and/or accomplishments
No new CCPUC proposed resources			

New Demand-Side Programs & Energy Consumption Improvements:

List energy efficiency, energy conservation, and load management programs your organization is planning to implement or evaluate in the next five years. Include key milestones to evaluate the progress of each program. Insert additional rows as needed. (See 10 CFR § 905.11 (b) (2)).

Example programs could include:

- Education programs & communications
- Energy efficient lighting upgrades
- Energy audits
- Weatherization & Insulation
- Window/doors upgrades
- Boiler, furnace or air conditioning retrofits
- Programmable thermostats
- Equipment inspection programs
- Use of infrared heat detection equipment for maintenance
- Tree-trimming/brush clearing programs
- Electric motor replacements
- Upgrading distribution line/substation equipment
- Power factor improvement
- Loan arrangements for energy efficiency upgrades
- Rebate programs for energy efficient equipment
- Key account programs
- Load management programs
- Demand control equipment
- Rate designs
- Smart meters (Time-of-Use Meters)

Proposed Items	Begin Date	Est. kW capacity savings per year	Est. kWh savings per year	Milestones to evaluate progress and/or accomplishments
No additional demand side programs are being proposed currently. Any future considerations can be included in our annual update.				

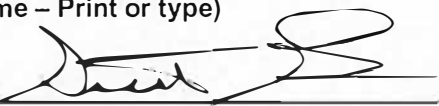
Measurement Strategies:

Describe your plan to evaluate and measure the actions and options identified in the IRP to determine if the IRP's objectives are being met. The plan must identify and include a baseline from which you will measure the IRP implementation's benefits. (See 10 CFR § 905.11 (b) (6)).

CCPUC will continue to monitor budgeted vs actual costs associated with electric supply and will continue to evaluate positive benefit to cost ratio projects that ultimately either reduce customers rates or their volatility.

SECTION 9**SIGNATURES AND APPROVAL****IRP Approval:**

Indicate that all the IRP requirements have been met by having the Responsible Official sign below; **and** provide documentation that the IRP has been approved by the appropriate governing body (i.e. provide a copy of the minutes that document an approval resolution). (See 10 CFR § 905.11 (b) (4)).

<u>Scott Graves</u> (Name – Print or type)	<u>Supt. of Utilities</u> (Title)
<u></u> (Signature)	<u>6/15/2026</u> (Date)

Other Information:

(Provide/attach additional information if necessary)

IRP Posting Requirement:

10 CFR § 905.23 of the EPAMP as amended effective July 21, 2008, facilitates public review of customers' approved IRPs by requiring that a customer's IRP be posted on its publicly available Web site or on WAPA's Web site. Please check the method in which you will comply with this requirement within thirty (30) days of receiving notification the IRP has been approved:

☐	Customer will post the approved IRP on its publicly available website and send the URL to WAPA.
☒	Customer would like WAPA to post the approved IRP on WAPA's website.