Exhibit No.:	
Issue:	*MEEIA Program Costs*
Witness:	*Brad J. Fortson*
Sponsoring Party:	*MoPSC Staff*
Type of Exhibit:	*Rebuttal Testimony*
Case Nos.:	*EO-2021-0416 and EO-2021-0417*
Date Testimony Prepared:	*February 14, 2022*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

BRAD J. FORTSON

EVERGY MISSOURI WEST, INC.,
d/b/a EVERGY MISSOURI WEST
CASE NO. EO-2021-0416

EVERGY METRO, INC.,
d/b/a EVERGY MISSOURI METRO
CASE NO. EO-2021-0417

Jefferson City, Missouri
February 2022

TABLE OF CONTENTS OF

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d/b/a EVERGY MISSOURI WEST
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EVERGY METRO, INC.,
d/b/a EVERGY MISSOURI METRO
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REBUTTAL TESTIMONY OF

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d/b/a EVERGY MISSOURI WEST
CASE NO. EO-2021-0416

EVERGY METRO, INC.,
d/b/a EVERGY MISSOURI METRO
CASE NO. EO-2021-0417

Q. Please state your name and business address.

A. My name is Brad J. Fortson and my business address is Missouri Public Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission ("Commission") as the Regulatory Compliance Manager of the Energy Resources Department.

Q. What is your educational background and work experience?

A. Please refer to Schedule BJF-r1 attached hereto.

Q. Have you previously filed testimony before this Commission?

A. Yes. Please refer to Schedule BJF-r2 attached hereto for a list of cases in which I have previously filed testimony.

Q. Please summarize your rebuttal testimony in this proceeding.

A. The purpose of my rebuttal testimony is to address the direct testimony of Office of the Public Counsel ("OPC") witness Angela Schaben and Evergy Missouri West, Inc., d/b/a Evergy Missouri West ("Evergy Missouri West") and Evergy Metro, Inc., d/b/a Evergy Missouri Metro ("Evergy Missouri Metro") (collectively "Companies") witness Brian A. File.

RESPONSE TO OPC WITNESS ANGELA SCHABEN

Q. What does Ms. Schaben recommend regarding administrative costs in her direct testimony?

A. Ms. Schaben states that she does not think Staff recommended enough disallowances for administrative costs.[1] Therefore, Ms. Schaben recommends additional disallowances of $1,523,413.16 for Evergy Missouri Metro and $2,410,278.21 for Evergy Missouri West.

Q. What do Ms. Schaben's additional disallowances represent?

A. Ms. Schaben's recommendation reduces administrative costs to 50% of the total program costs for each utility.[2]

Q. Has OPC previously raised this issue?

A. Yes. In Case No. EO-2020-0227[3] (Consolidated from EO-2020-0228[4]), OPC witness Dr. Geoff Marke made a similar recommendation, stating that Staff did not go far enough with its recommended disallowances. Dr. Marke recommended an additional disallowance to reflect a 50/50 equivalent in non-incentive to incentive cost breakdown.[5]

Q. What was Staff's response to Dr. Marke's recommended additional disallowance in regards to non-incentive and incentive costs in that case?

A. Staff witness Cynthia M. Tandy stated in her surrebuttal testimony in that case that:

[1] *Direct Testimony of Angela Schaben*, pg. 2.
[2] *Ibid.*
[3] The Second Prudence Review of MEEIA Cycle 2 Costs for Evergy Missouri Metro, Review Period April 1, 2018 – December 31, 2019.
[4] The Second Prudence Review of MEEIA Cycle 2 Costs for Evergy Missouri West, Review period April 1, 2018 – December 31, 2019.
[5] *Rebuttal Testimony of Geoff Marke*, pg. 2.

> Staff reviews all administrative costs, including incentives and non-incentives, in its MEEIA prudency reviews. Staff acknowledges this is a valid concern and will continue to closely monitor this issue going forward. However, Staff does not agree the additional recommended disallowance of $1,930,392 for Evergy Missouri West is warranted for the review period. Dr. Marke's additional recommended disallowance is simply premised on arbitrarily reducing non-incentive costs to achieve a "50/50 split" of incentive and non-incentive costs. Staff is of the opinion that this is a policy issue that deserves a more robust discussion, prospectively, outside of a prudence review, to more appropriately determine how to address it. Additionally, though, Staff would support any requirement the Commission may order that better encourages Evergy to decrease its non-incentive costs.[6]

Q. Has the Commission issued an order in the EO-2020-0227 case?

A. No, the Commission has not yet issued an order in that case. However, it was discussed by the Commission at the November 3, 2021, agenda meeting.

Q. What did the Commission conclude in that agenda discussion on this matter?

A. The Commission's discussion on this issue went as follows:

> **Chairman Silvey:** "Was Evergy's incentive to non-incentive cost ratio imprudent? I agree with Staff. I think that this is an issue that would be better addressed in a rulemaking docket since it can be better evaluated as a general policy concern. Commissioner Rupp?"
>
> **Commissioner Rupp:** "I believe it was not imprudent so and wanted to do further in the rulemaking is fine."
>
> **Chairman Silvey:** "Commissioner Coleman?"
>
> **Commissioner Coleman:** "I agree with Staff's position on this."
>
> **Chairman Silvey:** "Commission Holsman?"
>
> **Commissioner Holsman:** "I agree with Staff."
>
> **Chairman Silvey:** "Commissioner Kolkmeyer?"
>
> **Commissioner Kolkmeyer:** "And I do as well."

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[6] *Surrebuttal Testimony of Cynthia M. Tandy,* pg. 3.

Q. Did Staff address this issue in its current prudence review in Case Nos. EO-2021-0416 and EO-2021-0417?

A. Yes. However, Staff's *Staff Recommendation* ("Staff Report") was filed on October 28, 2021, prior to the November 3, 2021, agenda meeting.

Q. What did Staff state in regards to this issue in its *Staff Report* in Case No. EO-2021-0416?

A. In part, Staff stated the following for Evergy Missouri West in Case No. EO-2021-0416:

> For this current review period, the incentive cost to program administrative cost ratio for Evergy Missouri West grew further apart. For Cycle 3 costs alone in this review period, 38% of total costs were for incentives and 62% of total costs were for program administrative costs. It should be noted however, that by including Cycle 2 costs in this review period with Cycle 3 costs in this review period, 44% of total costs were for incentives and 56% of total costs were for program administrative costs. This is due to the fact that 76% of Cycle 2 costs in this review period were for incentives and 24% were for program administrative costs.
>
> Evergy Missouri West will likely be filing for an extension to Cycle 3 or for a Cycle 4 in the very near future. With that said, Staff reiterates its opinion from the previous Evergy Missouri West MEEIA prudence review that this is a policy issue that deserves a more robust discussion, prospectively, outside of a prudence review, to more appropriately determine how to address it. Evergy Missouri West's filing for an extension to Cycle 3 or for a Cycle 4 would be an appropriate platform to have these discussions. However, Evergy Missouri West should strive to improve its incentive to program administrative cost ratio for the remainder of Cycle 3.[7]

Q. What did Staff state in regards to this issue in its *Staff Report* in Case No. EO-2021-0417?

[7] Staff Report, pg. 18.

A. In part, Staff stated the following for Evergy Missouri Metro in Case No. EO-2021-0417:

> For this current review period, the incentive cost to program administrative cost ratio for Evergy Missouri Metro grew further apart. For Cycle 3 costs alone in this review period, 39% of total costs were for incentives and 61% of total costs were for program administrative costs. It should be noted however, that by including Cycle 2 costs in this review period with Cycle 3 costs in this review period, 44% of total costs were for incentives and 56% of total costs were for program administrative costs. This is due to the fact that 74% of Cycle 2 costs in this review period were for incentives and 26% were for program administrative costs.
>
> Evergy Missouri Metro will likely be filing for an extension to Cycle 3 or for a Cycle 4 in the very near future. With that said, Staff reiterates its opinion from the previous Evergy Missouri Metro MEEIA prudence review that this is a policy issue that deserves a more robust discussion, prospectively, outside of a prudence review, to more appropriately determine how to address it. Evergy Missouri Metro's filing for an extension to Cycle 3 or for a Cycle 4 would be an appropriate platform to have these discussions. However, Evergy Missouri Metro should strive to improve its incentive to program administrative cost ratio for the remainder of Cycle 3.[8]

Q. The *Staff Reports* mention that the Companies will likely be filing for an extension to Cycle 3 or for a Cycle 4 in the very near future. Have they made such a filing?

A. Yes. On January 31, 2022, in Case No. EO-2019-0132, the Companies filed an *Application for Approval to Extend MEEIA 3 Programs and Associated Variances* ("Application"), along with testimony of Brian A. File and Kimberly H. Winslow.

Q. How long are the Companies requesting to extend MEEIA Cycle 3?

A. The *Application* requests an extension for a one-year term, January 1, 2023 – December 31, 2023.

[8] Staff Report, pg. 18.

Q. What does Staff recommend in regards to the administrative cost issue that OPC raises as it pertains to the *Application* filing in Case No. EO-2019-0132?

Q. Consistent with Staff's position in Case No. EO-2020-0227 and Case Nos. EO-2021-0416 and EO-2021-0417, Staff believes this is a policy issue that deserves a more robust discussion, prospectively, outside of a prudence review, to more appropriately determine how to address it. Now that an application for a one-year extension to MEEIA Cycle 3 has been filed in Case No. EO-2019-0132, Staff believes that is the more appropriate platform to have the administrative cost discussion. Therefore, Staff recommends the parties address the administrative cost issue as a part of the Application filing in Case No. EO-2019-0132.

Q. Is Staff's recommendation consistent with the Commission's agenda discussion on this issue?

A. Yes. The Commission agreed with Staff's position on this issue in its agenda discussion of Case No. EO-2020-0227. While a rulemaking was mentioned in the agenda discussion as a means to address this issue, Staff believes the Commission can appreciate Staff's position to take action now as part of the *Application* filing in Case No. EO-2019-0132, and not "kick the can" down the road to a future rulemaking.

<u>RESPONSE TO COMPANIES' WITNESS BRIAN A. FILE</u>

Q. What did Staff recommend as a disallowance in relation to the Companies' Home Energy Report ("HER") program?

A. Due to Staff's concern that the Companies do not account for rate case timing in their calculation of HER throughput disincentive ("TD"), Staff recommended a disallowance to Evergy Missouri West of $1,577,602 (plus interest) and to Evergy Missouri Metro of $1,771,159 (plus interest).

Q. How does Mr. File respond to Staff's concern that the Companies do not account for rate case timing in their calculation of HER TD?

A. For the most part, Mr. File fails to address the concern raised by Staff that the Companies do not account for rate case timing in their calculation of HER TD. Instead, Mr. File first states his opinion of the prudence standard as set forth in *State ex rel. Associated Natural Gas Co. v. Public Service Com'n of State of Mo.* He then relies upon two additional claims: 1) The Company complied with the 2018 general rate case stipulation and agreement, including Staff's schedule for agreed upon kWh billing determinants used for setting rates, and 2) The Company also complied with the Missouri Public Service Commission ("Commission") approved MEEIA Cycle 3 DSIM rider tariffs for HER recovery of TD.

Q. How do you respond to Mr. File's first point on the prudence standard?

A. Mr. File at least references the prudence standard, the prudence standard in fact that Staff follows in its prudence reviews, correctly. However, Mr. File is not applying it correctly. Mr. File states the Company reasonably relied on existing Commission orders and tariffs at the time that the HER related costs were incurred and recovered from customers as his primary argument for why the Company acted prudently.[9] This is often reasonable and an appropriate approach when relied upon in conjunction with one another. However, when relying on an existing order independently of a Commission-approved tariff causes ratepayer harm, that action should be considered unreasonable and imprudent. Mr. File fails to address a key component of the standard, sometimes referred to as the "reasonableness standard," by sidestepping the issue of Evergy double-counting savings attributable to the HER program.

[9] *Direct Testimony of Brian A. File*, pg. 4.

As stated in Staff's prudence review report,[10] "In evaluating prudence, Staff reviews whether a reasonable person making the same decision would find both the information the decision-maker relied on and the process the decision-maker employed to be reasonable based on the circumstances and information known at the time the decision was made, *i.e.*, without the benefit of hindsight." It is reasonable to assume that Evergy personnel understood the interaction of energy savings estimates attributable to HER, and how those savings relate to facts determined through the pendency of Evergy's general rate case proceeding, namely the billing determinants. A reasonable person would then account for that interaction accordingly when calculating the TD to avoid double-counting the savings.

Q. How do you respond to Mr. File's statement that the Company complied with the 2018 general rate case stipulation and agreement, including Staff's schedule for agreed upon kWh billing determinants used for setting rates?

A. Staff agrees that in that case the parties agreed that Staff's billing determinants would be used for the purpose of establishing rates.[11] However, relying on the Commission's order establishing billing determinants independently of the Commission-approved MEEIA tariff sheets caused ratepayer harm.

Q. How did relying on the Commission's order independently of the Commission-approved MEEIA tariff sheets cause ratepayer harm?

A. Relying solely on the Commission's order establishing billing determinants instead of in conjunction with the Commission-approved MEEIA tariff sheets allowed for rates to be established based on billing determinants that already included HER savings without

[10] *Staff Recommendation*, Case Nos. EO-2021-0416 and EO-2021-0417, filed on October 28, 2021.
[11] *Order Approving Stipulations and Agreements*, issued on October 31, 2018, Case No. ER-2018-0145.

accounting for the Company being made whole by the HER TD recovery through the Commission-approved MEEIA tariff sheets. Not accounting for the savings which were already reflected in permanent rates when calculating HER TD resulted in double-counting and over-recovery.

Q. How do you respond to Mr. File's statement that the Company also complied with the Commission-approved MEEIA Cycle 3 DSIM rider tariff sheets for HER recovery of TD?

A. Staff agrees that the Company uses the TD calculation from its Commission-approved MEEIA Cycle 3 tariff sheets in calculating its DSIM rates. However, relying on the Commission-approved MEEIA Cycle 3 tariff sheets independently of the Commission order approving the use of Staff's billing determinants caused ratepayer harm.

Q. How did relying on the Commission-approved MEEIA tariff sheets independently of the Commission order establishing billing determinants cause ratepayer harm?

A. Relying solely on the Commission-approved MEEIA tariff sheets instead of in conjunction with the Commission order establishing billing determinants allows for the Company to be made whole on HER TD through its Commission-approved MEEIA tariff sheets despite currently effective rates already accounting for lower usage due to HER savings being included in billing determinants. Not accounting for the savings which were already reflected in permanent rates when calculating HER TD resulted in double-counting and over-recovery.

Q. On page 6 of Mr. File's direct testimony, Mr. File states that the DSIM ridertariff does not require the Company to adjust for a level of HER savings that may already be reflected in currently effective base rates per Staff's disallowance. Is Mr. File's statement reasonable?

A. No.

Q. Do the DSIM rider tariff sheets explicitly state that an adjustment should be made to account for double-counting in order to avoid ratepayer harm?

A. No.

Q. Although this is not explicitly stated in the DSIM rider tariff sheets, does the Company have a responsibility to ratepayers to account for double-counting in order to avoid ratepayer harm?

A. Yes.

Q. What exactly does the tariff state?

A. The tariff sheets state the formula and a brief definition of certain inputs. The dispute between the Company and Staff is in the calculation of HER kWh savings for the TD calculation. According to the tariff, the definition for the HER input into the TD calculation states that HER = Monthly kWh savings for the Home Energy Reports programs measured and reported monthly by the program implementer.[12] As you can see, there is no definition or explanation of how to calculate the TD for the monthly savings of HER. It is reasonable to assume that Evergy personnel would understand the interrelation of energy savings estimates attributable to HER when calculating the TD and how those savings relate to the billing determinants used to determine Evergy's current permanent rates. However, it may not be reasonable to assume that the HER program implementer,[13] understood the aforementioned interrelation when estimating monthly savings attributable to the HER. It is the responsibility of Evergy personnel to ensure that the HER energy savings calculated for the purpose of TD recovery is adjusted to avoid any double-counting and any subsequent double-recovery.

[12] Evergy Missouri Metro P.S.C. MO. No. 7 Original Sheet No. 49W; Evergy Missouri West P.S.C. MO. No. 1 Original Sheet No. 138.15.
[13] Oracle.

Ignoring the interaction of the general rate case timing and recovering an inflated TD is imprudent. Staff recommends that the Commission order a disallowance of $1,771,159, plus interest, for Evergy Missouri Metro and $1,577,602, plus interest, for Evergy Missouri West to account for Evergy's failure to make appropriate adjustments to the TD.

Q. What is Staff's position regarding the appropriate method to calculate HER kWh savings?

A. Staff's position is that the Company is double-counting HER kWh savings.

Q. What do you mean by double-counting?

A. It is Staff's position that HER kWh savings have already been accounted for by the lower billing determinants used to set rates in the Company's last general rate case. These billing determinants were lower due to the HER program that was in effect for the test year used to establish billing determinants. Once the Company's base rates were set on the lower usage, in order to be credited with more kWh savings through its HER TD, the participating customers should have incrementally lower usage or there should be more participating customers. This would account for the incremental change in HER kWh savings since base rates were last set on the lower usage in the last general rate case.

What the Company has done is have base rates set higher due to lower usage that accounts for HER kWh savings, and then it calculates the lower usage for participants that predates its last general rate case as savings to be recouped through the TD. Thus the Company is attempting to be made whole through higher base rates and the TD. This is the double-counting.

Q. Can you explain further how the Company is double-counting HER savings?

A. Yes. It comes down simply to the relationship of the HER TD calculation and rate case timing. There is currently no adjustment made in a general rate case to remove HER savings from the test period usage used to develop rates in that general rate case. Therefore, the reduced monthly usage that occurred to customers receiving a HER during the test period is already reflected in the Company's currently effective rates. However, the Company is simultaneously reporting a deemed level of savings[14] for its TD for those same customers receiving a HER. Since the Company's currently effective rates have already accounted for the reduced monthly usage that occurred due to customers receiving a HER during the test period, TD recovery based on a deemed level of savings utilizing usage information prior to that same test period leads to double-counting.

Q. Is there any additional evidence that the savings attributable to HER is already reflected in the test period usage used to develop rates in the most recent general rate case?

A. Yes. As Mr. File states in his direct testimony supporting Evergy's MEEIA Cycle 3 extension request for 2023, "The Company has offered the HER program to customers for nearly eight years. The program is at a steady state in terms of number of participants and the savings achieved per participant."[15] Mr. File then goes on to state that, "[Evergy] also proposes to continue to evaluate the HER energy savings so that it may adjust for these energy savings in current and future general rate cases and eliminate the need for recovery of the throughput disincentive, nor will it seek any earnings opportunity associated with the HER program."[16]

Q. How should the Company have corrected for the double-counting issue?

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[14] Which relies on customer usage prior to the test period utilized in the general rate case.
[15] Page 10 of the Direct testimony of Evergy witness Brian A. File in Case No. EO-2019-0132.
[16] Ibid.

A. The Company should have adjusted the TD to reflect that a certain level of HER savings are already reflected in currently effective rates. This approach would have avoided the double-counting issue and would not have precluded Evergy from recovering TD associated with incremental savings beyond the savings already included when determining rates in the general rate case. Staff's proposed HER TD disallowance in this case attempts to align with this method by recommending an adjustment after the HER TD has already been recovered from ratepayers through the DSIM Rider.

Q. Is the Company proposing to address this issue going forward?

A. It appears so. On January 31, 2022, in Case No. EO-2019-0132, the Company filed its *Application for Approval to Extend MEEIA 3 Programs and Associated Variances* ("Application"), as well as supporting testimony of Brian A. File and Kimberly H. Winslow. The *Application* seeks to extend the Company's MEEIA Cycle 3 by one year, through December 31, 2023. In the *Direct Testimony of Brian A. File* in that case, Mr. File proposes for 2023, to eliminate recovery of HER TD. Surprisingly, Mr. File further recommends that in future general rate cases, potentially including its current general rate case,[17] to "add back in" the annual energy savings from the HER program as deemed by Evaluation, Measurement, & Verification. Mr. File further states that the net effect of adding the HER energy savings back to billing determinants is that the rate per kWh will be lower because of increased kWhs to spread across costs. Since the kWhs will be adjusted in the rate case and Evergy will not be claiming TD for any incremental savings, customers are held whole and rates are generally lower than they would be otherwise.[18]

[17] Evergy has not yet made such an adjustment in its current general rate case.
[18] *Direct Testimony of Brian A. File*, pgs. 10 – 11, Case No. EO-2019-0132.

Q. In doing this, Mr. File appears to recognize that there is an issue and a need to correct for it. Mr. File's recommendation is to make an adjustment in a general rate case to account for HER TD. Is this a reasonable way to correct for the issue?

A. Depending on how that adjustment is made, it may be. Mr. File seems to at least finally be acknowledging that there is an issue and a need to correct for it to account for HER TD. However, an adjustment in a future general rate case does not alleviate the harm inflicted on ratepayers through Evergy's double-counting of the savings, nor.does it eliminate Staff's recommended disallowance in regards to HER TD for the Review Period in this case.

Q. Does Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") address the HER TD issue either by making an adjustment in a general rate case or by adjusting its TD?

A. Yes. Ameren Missouri makes an adjustment to its TD in its DSIM rider filings to account for only the incremental savings attributed to HERs since the effective date of rates set in its most recent general rate case.

Q. Does this conclude your rebuttal testimony?

A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the First Prudence Review of the Missouri Energy Efficiency Investment Act (MEEIA) Cycle 3 Energy Efficiency Programs and Cycle 2 Long-Lead Projects of Evergy Missouri West, Inc. d/b/a Evergy Missouri West	)))))	Case No. EO-2021-0416
		and
In the Mater of the First Prudence Review of the Missouri Energy Efficiency Investment Act (MEEIA) Cycle Energy Efficiency Programs and Cycle 2 Long-Lead Projects of Evergy Metro, Inc. d/b/a Evergy Missouri Metro	)))))	Case No. EO-2021-0417

AFFIDAVIT OF BRAD J. FORTSON

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW BRAD J. FORTSON and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Brad J. Fortson*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Brad J. Fortson

BRAD J. FORTSON

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 14th day of February 2022.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070

D Suzie Mankin

Notary Public

Brad J. Fortson

Education and Employment Background

I am the Regulatory Compliance Manager of the Energy Resources Department, Industry Analysis Division of the Missouri Public Service Commission. Prior to my current position, I was employed at the Missouri Public Service Commission as a Regulatory Economist from December 2012 through March 2015 and August 2015 through February 2019.

I received an Associate of Applied Science degree in Computer Science in May 2003, Bachelor of Science degree in Business Administration in May 2009, and Master of Business Administration degree with an emphasis in Management in May 2012, all from Lincoln University, Jefferson City, Missouri.

Prior to first joining the Commission, I worked in various accounting positions within four state agencies of the State of Missouri. I was employed as an Account Clerk II for the Inmate Finance Section of the Missouri Department of Corrections; as an Account Clerk II for the Accounts Payable Section of the Missouri Department of Health and Senior Services; as a Contributions Specialist for the Employer Accounts Section of the Missouri Department of Labor and Industrial Relations; and as an Accountant I for the Payroll Section of the Missouri Office of Administration. From April 1 through July 31, 2015, I worked for the Missouri Office of Public Counsel before joining the Commission once again.

Brad J. Fortson			
Case Participation History			
Case Number	**Company**	**Issue**	**Exhibit**
HR-2014-0066	Veolia Energy Kansas City	Revenue by Class and Rate Design	Staff Report
GR-2014-0086	Summit Natural Gas of Missouri, Inc.	Large Volume Service Revenue	Staff Report
ER-2014-0258	Union Electric Company d/b/a Ameren Missouri	Revenue by Class and Rate Design	Staff Report
ER-2014-0258	Union Electric Company d/b/a Ameren Missouri	Revenue by Class and Rate Design	Staff Report, Rebuttal & Surrebuttal Testimony
ER-2014-0351	The Empire District Electric Company	Revenue by Class and Rate Design	Staff Report & Rebuttal Testimony
ER-2014-0351	The Empire District Electric Company	Revenue by Class and Rate Design	Rebuttal Testimony
EO-2015-0240	Kansas City Power & Light Company	Custom Program Incentive Level	Direct Testimony
EO-2015-0241	KCP&L Greater Missouri Operations Company	Custom Program Incentive Level	Direct Testimony
ER-2016-0023	The Empire District Electric Company	DSM Programs and MEEIA Filings	Staff Report
ER-2016-0023	The Empire District Electric Company	DSM Programs and MEEIA Filings	Staff Report, Rebuttal & Surrebuttal Testimony
EM-2016-0213	The Empire District Electric Company (merger case)	DSM Programs and MEEIA Filings	Rebuttal & Surrebuttal Testimony
ER-2016-0156	KCP&L Greater Missouri Operations Company	MEEIA summary and LED street lighting	Staff Report
EO-2016-0183	Kansas City Power & Light Company	MEEIA prudence review	Staff Report
EO-2016-0223	The Empire District Electric Company	Triennial compliance filing	Staff Report
ER-2016-0285	Kansas City Power & Light Company	LED street lighting	Staff Report
ER-2016-0179	Union Electric Company d/b/a Ameren Missouri	LED street lighting	Staff Report
ER-2016-0285	Kansas City Power & Light Company	Response to Commissioner questions	Staff Report
ER-2016-0179	Union Electric Company d/b/a Ameren Missouri	Response to Commissioner questions	Staff Report
EO-2017-0209	Kansas City Power & Light Company	MEEIA prudence review	Staff Report
EO-2017-0210	KCP&L Greater Missouri Operations Company	MEEIA prudence review	Staff Report
EO-2015-0055	Union Electric Company d/b/a Ameren Missouri	Flex pay pilot program	Rebuttal Testimony
GR-2018-0013	Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities	Red Tag Program and Energy Efficiency Program Funding	Staff Report, Rebuttal & Surrebuttal Testimony
ER-2018-0145	Kansas City Power & Light Company	LED street lighting, TOU rates	Rebuttal Testimony
ER-2018-0146	KCP&L Greater Missouri Operations Company	LED street lighting, TOU rates	Rebuttal Testimony
EO-2018-0211	Union Electric Company d/b/a Ameren Missouri	Program Design	Rebuttal Report & Surrebuttal Testimony
EO-2019-0132	Kansas City Power & Light Company	Program Design	Rebuttal Report & Surrebuttal Testimony
EO-2019-0376	Union Electric Company d/b/a Ameren Missouri	MEEIA prudence review	Direct Testimony
ER-2019-0374	The Empire District Electric Company	Hedging policy and EE/LI programs	Supplemental Testimony
EO-2020-0280	Evergy Metro	IRP Annual Update	Staff Report
EO-2020-0281	Evergy Missouri West	IRP Annual Update	Staff Report
ER-2020-0311	The Empire District Electric Company	Fuel Adjustment Clause	Rebuttal Testimony
EO-2020-0227	Evergy Metro and Evergy Missouri West	MEEIA prudence review	Direct Testimony
EO-2020-0262	Evergy Metro and Evergy Missouri West	FAC prudence review	Direct & Rebuttal Testimony
EO-2021-0021	Union Electric Company d/b/a Ameren Missouri	Triennial compliance filing	Staff Report
EO-2021-0035	Evergy Metro	Triennial compliance filing	Staff Report
EO-2021-0036	Evergy Missouri West	Triennial compliance filing	Staff Report
EO-2021-0416	Evergy Missouri West	MEEIA prudence review	Staff Report
EO-2021-0417	Evergy Metro	MEEIA prudence review	Staff Report
EO-2022-0061	Evergy Missouri West	Application for Special Rate	Rebuttal Testimony